

## 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.*

Title

First Name

Last Name

Job Title  
(where relevant)

Organisation  
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

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

Telephone Number

E-mail Address

(where relevant)

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

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Name or Organisation:

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	Policy S2/S6/Annex: Development Site Allocations	Policies Map	<input type="text"/>
Site ID	136				

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 checked="" type="checkbox"/>	No	<input 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.

Please refer to the accompanying written representations.

The Plan diversifies the location and size of housing sites to better reflect the borough's mix of town and rural locations. Allocations are made for 1,653 homes at the borough's rural settlements. These villages mostly lie within the Green Belt and alterations to Green Belt boundaries are proposed. The main rural settlements (including Wolston) provide the greatest range of rural services and new housing will support village sustainability.

We are supportive of this dispersed strategy, alongside the continued allocation and delivery at large strategic sites. This approach aligns with the Framework which advises that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. There is

a requirement for smaller allocations to meet identified housing needs, in accordance with Paragraph 72 of the Framework, which states:

*'...planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*

- a) specific, deliverable sites for five years following the intended date of adoption; and*
- b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.'*

It is hence considered that the overall spatial strategy, which proposes smaller allocations across most of the larger villages, is an approach which is more likely to meet the identified housing needs and help achieve and maintain a five-year housing land supply.

Land north of Warwick Road, Wolston (Site Ref. 136) is included as a residential allocation under Policy S6 with a capacity of 80 units. The development of the site shall accord the development principles set out in the development site allocations annex and with other policies of the plan.

As has been established, the development principles in the Annex to the Plan for land north of Warwick Road, Wolston set out that the new homes shall be for specialist over 55 accommodation or shall comprise bungalows with two or fewer bedrooms. The evidence to underpin this limitation on the housing mix and tenure comprises the Education Topic Paper (December 2025).

With particular regard to the primary school provision in Wolston, the Education Topic Paper concludes:

*'10.20. Wolston St Margaret CofE Primary School is not projected in the model to exceed capacity, but remains close to capacity. In both 2022-23 and 2023-24, 87% of children at the school were resident in Wolston and The Lawfords Ward. The priority area for the school lies entirely within the ward. This indicates that there is limited capacity for this school to accommodate children from new housing in Wolston by shrinking the area from which it admits children to focus on the priority area. This is further likely to be the case if there is 'push back' from Knightlow CoE Primary School due to new housing in Stretton-on-Dunsmore.*

*10.21. This supports the advice received from Warwickshire County Council that there is very limited additional capacity for the children from new housing in Wolston to attend the village school.*

*10.27. The model does not present clear evidence of a need to expand primary schools or build new schools, beyond those already planned, to meet the demand for places. The model indicates that the position at Knightlow CofE Primary School and the wider Rugby Rural Primary School Place Planning Area should be kept under review as the plan period progresses.'*

For the Preferred Options Consultation in 2025, Catesby Estates commissioned a specialist consultant (Turley) to undertake a review of the primary school capacity in Wolston (included at **Appendix 3**).

Wolston contains a single primary school – St Margaret’s Church of England Primary School. There are a three primary schools within a 2-mile radius of the promotion site, with this distance being significant in the context of the 1996 Education Act which stipulates that this is the furthest a child of primary school age could reasonably be expected to travel.

It is acknowledged that Wolston St Margaret’s Church of England Primary School is currently near to capacity. It is reportedly able to accommodate 210 pupils but had 225 in the last reported academic year (2023/24). However, by contrast, the schools that are located within a 2-mile radius of the promotion site are under capacity. This serves to offset the rise seen at Wolston St Margaret’s if the schools are treated collectively, with a combined pupil roll falling and now standing at c. 81 pupils below their collective capacity.

Warwickshire County Council produces forecasts that estimate pupil numbers up to five years into the future. In the latest WCC Annual Education Sufficiency Update (January 2025), it is anticipated that demand will continue to fall in the “Rugby Rural” planning area that contains all of the nearby schools to Wolston.

Based on the above, there appears to exist – and is forecast to remain – surplus capacity in nearby schools that could theoretically accommodate any demand that would be generated by up to 80 new homes in Wolston, in the event that there is insufficient places at Wolston St Margaret’s and it cannot be expanded.

At this Submission Local Plan Consultation stage of the plan-making process, comments are invited on whether the Local Plan is legally compliant or is sound. In the case of Site 136 Land north of Warwick Road, Wolston, the Council has commissioned an Education Topic Paper which alludes to limited capacity at the only primary school in Wolston and so has restricted the allocation to providing specialist over 55 accommodation or bungalows with two or fewer bedrooms - in an attempt to minimise the pressure of additional school places on St Margaret’s Church of England Primary School.

Catesby Estates generally support the development principles for their site at land north of Warwick Road, Wolston as it is considered that the development principles are evidence-led. Indeed, the updated HEDNA identifies that the older person population is projected to increase notably moving forward. Key findings for the 2025-43 period include a 29% increase in the population aged 65+ (potentially accounting for 47% of total population growth).

However, Catesby Estates reserve the right to review the position at Knightlow CofE Primary School and the wider Rugby Rural Primary School Place Planning Area with Rugby Borough Council and Warwickshire County Council during the plan period to 2042, in line with the recommendations of the Education Topic Paper.

It is submitted that if pupil numbers continue to fall over the Plan Period and allocated sites in surrounding villages are not delivered, it would be reasonable to revisit the proposed housing mix and tenure for the development proposals at land north of Warwick Road, Wolston on the basis that there will be capacity at primary schools within a two-mile radius.

This position is considered to be further justified by the sustainability credentials of Wolston and the promotion site as revealed in the evidence base supporting the Submission Local Plan Consultation, with the Sustainability Appraisal (December 2025) concluding (at paragraph 5.4.86) that the site is:

*"the next port of call" should the primary school issue be addressed, and otherwise the site is subject to limited constraint, albeit it would extend an already linear built form.*

Furthermore, the updated Stage 2 Site Options Assessment (December 2025) concludes the following for Site 136: Land North of Warwick Road, Wolston:

*'There are medium ecology constraints and landscape sensitivity is assessed as Medium/Low. Heritage constraints are not flagged. The site provisionally lies within the Grey Belt. The site is a proposed allocation due to the relatively few constraints and good relationship with the village.'*

The evidence base provides a very positive context for Wolston which is clearly a sustainable location to accommodate housing growth in consideration of:

- i. The pressing need for additional housing within Rugby Borough;
- ii. The limited ability of Rugby Town to accommodate further growth, considering the maximisation of housing delivery on the urban edge of Rugby as part of the adopted Local Plan;
- iii. The fact that Wolston comprises a Main Rural Settlement and thus comprises one of the most sustainable settlements in the borough but has not been significantly extended as part of the adopted Local Plan.
- iv. All land surrounding Wolston has been assessed as comprising grey belt land.

Catesby Estates therefore welcome the proposed residential allocation at Land North of Warwick Road, Wolston which is considered to be robustly justified and evidence-led

(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.

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**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:

Catesby Estates have a legal right to appear before and be heard by the inspector at a hearing as they have made a comment (a 'representation') on the 'Regulation 19' plan.

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9. If you have used AI to produce or substantially alter your representation, please declare which tool you have used, how it was used, and what checks you have undertaken to ensure the AI-produced material is accurate.

Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

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

Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	Policy CL1	Policies Map	
Site ID	136				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	✓
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	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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Please refer to the accompanying written representations.

Policy CL1 Net zero buildings sets out that new buildings comprising one or more dwellings must be designed and built to be net zero carbon in operation.

Whilst Catesby Estates agree with the Council that there is a need to act to reduce carbon emissions, Catesby Estates disagree that this needs to be undertaken through the local plan given that there is already a national approach, the emerging Future Homes Standard (FHS).

Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the Borough, in that it provides a single approach that all developers understand and can be rolled out at scale.

However, if the Council chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences and gives consideration as to how the requirements are consistent with the Written Ministerial Statement (WMS) published on the 13th of December 2023 titled "Planning – Local Energy Efficiency Standards Update".

The approach proposed by the Council is based on energy use, and is inconsistent with the approach set out in the WMS and as such is unsound.

The WMS is extant policy, in force and advises against exceeding national policies. It is something Local Plans and Planning Authorities must take into account (See NPPF para 6). The Ministerial Statement clearly states:

*"The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures..."*

While Catesby Estates do not consider the policy to be consistent with national policy we are also concerned that the Council has not properly considered the impact on viability or the deliverability of development. The Council will need to ensure the costs and deliverability of this policy are fully and robustly tested, and there is currently no evidence of this.

While Catesby Estates understands the desire for LPAs to go further, current policy recognises that even where development can viably implement higher standards this must be within a consistent technical framework and approach to assessing building performance against those technical standards. Indeed, this has long been the case in planning policy with paragraph 164b of the NPPF (December 2024) stating that *"Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards"*.

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

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It is hence considered that Policy CL1 should reflect national policy requirements for reducing carbon emissions and as such, the policy is considered to be surplus to requirements and should be deleted.

(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:

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

Local Plan Paragraph		Local Plan Policy	Policy EN6	Policies Map	
Site ID	136				

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Policy EN6 (Canopy cover) requires all major development to increase the post-development canopy cover to at least 20% of the site area, excluding areas of the site that are high or very high distinctiveness habitats.

Catesby Estates do not disagree with the broad thrust that the UK has seen a significant loss in woodland and understand the benefits of increasing canopy cover. However, it is important to recognise that in recent years new residential development has not been the driver of declining woodland. The main drivers of declining biodiversity in England, as outlined in the State of Nature Report 2023 (State of Nature Partnership, 2023), are identified as being:

*“Intensive management of agricultural land, largely driven by policies and incentives since World War II, has been identified as the most significant factor driving species’ population change in the UK”.*

Whilst species are in decline, Catesby Estates would suggest that it is not for new development to address the impact of other industries, it is considered that the supporting documents provide a lack of suitable justification of the local need for

a 20% canopy cover policy. It is also considered that this is not a necessary policy requirement and can be controlled through the Development Management process.

(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.

As above, Catesby Estates would suggest that it is not for new development to address the impact of other industries, it is considered that the supporting documents provide a lack of suitable justification of the local need for a 20% canopy cover policy. It is also considered that this is not a necessary policy requirement and can be controlled through the Development Management process. Therefore, the policy should be deleted.

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

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**TOWN AND COUNTRY PLANNING ACT 1990**

**RUGBY BOROUGH LOCAL PLAN 2025 - 2042  
PROPOSED SUBMISSION LOCAL PLAN CONSULTATION (REGULATION 19)  
JANUARY 2026**

**REPRESENTATIONS ON BEHALF OF  
CATESBY ESTATES**

**LAND NORTH OF WARWICK ROAD, WOLSTON (SITE 136)**

**MARCH 2026  
OUR REF: WW/11013**

## 1.0 LAND TO THE NORTH OF WARWICK ROAD, WOLSTON

1.1 This submission is made on behalf of Catesby Estates, in relation to their interests at land north of Warwick Road, Wolston (hereafter referred to as ‘the Site’). Catesby Estates welcome the opportunity to be involved in the preparation of the Rugby Borough Local Plan, and it is within this context that they wish to make representations to the Proposed Submission Local Plan Consultation.

1.2 The Site has previously been submitted to the Local Plan making process for consideration by L&Q Estates. In August 2024, Urban&Civic plc acquired L&Q Estates from London & Quadrant Housing Trust (L&Q HT). Following this acquisition, the former L&Q Estates portfolio and team has been incorporated within Urban&Civic plc as master developer and Catesby Estates as land promoter.

1.3 The Site is shown outlined in red on Drawing SK001 (**Appendix 1**) and is located on the western edge of the village of Wolston, to the north of Warwick Road. It extends to 3.87 ha (9.56 acres) and can deliver a high-quality residential development. The land is available and the development is deliverable and unconstrained technically. A Constraints and Opportunities Plan has been prepared and is included at **Appendix 2**.

1.4 Catesby Estates support the site’s proposed allocation under draft Policy S6 Residential allocations. There is a compelling case to support the allocation of land north of Warwick Road, Wolston for a residential allocation by reason of:

- Wolston is categorised as a Main Rural Settlement – a second-tier settlement behind Rugby in terms of its sustainability credentials. It is identified in the Sustainability Appraisal (SA) of the Rugby Borough Local Plan (December 2025) and the Rural Sustainability Study (2025) as the third-most sustainable settlement in the Borough (excluding Rugby) by reason of its access to services, public transport and the internet.
- There are a range of local services and facilities located within close proximity of the promotion site, including:
  - Wolston Leisure & Community Centre (550m)
  - Wolston Library & Information Centre (700m)
  - Convenience Store (850m)
  - Wolston Surgery (950m)
  - Wolston St Margaret’s C of E Primary School (1.1km)
- The promotion site immediately adjoins the built-up area boundary of Wolston and adjoins existing residential development to the east. The site is contained by Warwick Road to the south, Wolston Fields Farm Road to the west and playing fields associated with Wolston Leisure and Community Centre to the north. Therefore, the development of this site would form an enduring definition to the built-up area boundary.
- There is a bus stop located on Manor Estate approximately 350m to the east of the site. From this stop, services connect the site to Coventry and Rugby (Bus 86).

- It is considered that the proposals for up to 80 dwellings would not lead to a level of increase in traffic on local roads that would be harmful to the local area. The site can be suitably accessed from Warwick Road via the provision of a new priority T-junction and could be accompanied by an extension of the 30mph speed limit past the site and creation of a village gateway feature. The Stage 2 Site Options Assessment (December 2025) identifies that the surrounding road network has relatively low levels of congestion.
- The site is shown as being in Flood Zone 1 and thus is situated in an area with very low risk of flooding.
- The Stage 2 Site Options Assessment (December 2025) identifies that the landscape sensitivity is Medium/Low. It is submitted that the site would be suitable for development providing roadside trees and hedgerows are reinstated and a landscape buffer is provided between the site and northern part of the parcel.
- The Ecological Constraints Assessment (October 2025) identifies that the site *'has potential to be taken forward for development subject to demonstrating that there would be no adverse effects upon Brandon Marsh SSSI through sensitive site design and the adoption of appropriate mitigation measures.'*
- The site comprises land in agricultural use. The site's agricultural land classification comprises predominantly Grade 3 agricultural land, although some Grade 2 land is present to the north west of the site where there is a water body. The loss of this amount of agricultural land should not be regarded as being 'large'. Indeed, the statutory consultation requirement with DEFRA on development proposals is some 20 hectares.

1.5 The Annex to the Plan entitled 'Development Site Allocations' provides details for the development site allocations under Policy R6. The policy states that the development of the allocated sites shall accord with the development principles set out in the annex, which should be read *'as if it is incorporated into the policy text.'*

1.6 For Site ID: 136 Land North of Warwick Road, Wolston it states that the new homes shall be for specialist over 55 accommodation or shall comprise bungalows with two or fewer bedrooms. The justification for this is provided in the Education Topic Paper (December 2025) which explains that there is very limited additional capacity for the children from new housing development in Wolston to attend the village school (Wolston St Margaret CofE Primary school).

1.7 The Representation Form asks respondents three key questions:

- Is the plan legally compliant? Does it comply with relevant legislation and regulations in the way it has been prepared and in its content?
- Is the plan 'sound'? Has the plan been 'positively prepared'? Is it robustly justified and evidence-led? Will it be effective in what it sets out to achieve? Is it consistent with the latest regional and national planning policy?

- Does the plan comply with the 'Duty to Cooperate'? Has the Council engaged constructively, actively and on an ongoing basis with neighbouring authorities and other prescribed bodies during the preparation of the plan?

1.8 Catesby Estates are generally supportive of the development principles for their site as it is considered that the restriction of the housing mix and tenure to specialist over 55s/bungalows is evidence-led, with particular regard to the Education Topic Paper. Indeed, the updated HEDNA identifies that the older person population is projected to increase notably moving forward. Key findings for the 2025-43 period include a 29% increase in the population aged 65+ (potentially accounting for 47% of total population growth).

1.9 However, in line with the recommendations of the Education Topic Paper, Catesby Estates reserve the right to review the capacity of the local primary schools with Rugby Borough Council and Warwickshire County Council during the plan period to 2042, particularly in the event that any allocations in Stretton-on-Dunsmore and Binley Woods do not come forward. If, following the adoption of the Plan, the local primary schools have a demonstrable capacity to accommodate the level of growth proposed for land north of Warwick Road, Wolston, it would then be appropriate to review the proposed housing mix and tenure.

1.10 The following sections of these representations respond to the policies and documents (and evidence base documents) listed below:

#### **Policies**

- S2 Strategy for Homes
- S6 Residential allocations
- Annex: Development site allocations
- CL1 Net Zero Buildings
- EN5 Canopy Cover

#### **Documents**

- Development Needs Topic Paper (December 2025)
- Ecological Constraints Assessment (October 2025)
- Education Topic Paper (December 2025)
- Stage 2 Site Options Assessment (October 2025)
- Sustainability Appraisal (December 2025)
- Updated Housing Needs Evidence (September 2025)

## 2.0 POLICY S2 STRATEGY FOR HOMES AND POLICY S6 RESIDENTIAL ALLOCATIONS

2.1 The Plan diversifies the location and size of housing sites to better reflect the borough's mix of town and rural locations. Allocations are made for 1,653 homes at the borough's rural settlements. These villages mostly lie within the Green Belt and alterations to Green Belt boundaries are proposed. The main rural settlements (including Wolston) provide the greatest range of rural services and new housing will support village sustainability.

2.2 We are supportive of this dispersed strategy, alongside the continued allocation and delivery at large strategic sites. This approach aligns with the Framework which advises that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. There is a requirement for smaller allocations to meet identified housing needs, in accordance with Paragraph 72 of the Framework, which states:

*'...planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*

- a) specific, deliverable sites for five years following the intended date of adoption; and*
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2.3 It is hence considered that the overall spatial strategy, which proposes smaller allocations across most of the larger villages, is an approach which is more likely to meet the identified housing needs and help achieve and maintain a five-year housing land supply.

2.4 Land north of Warwick Road, Wolston (Site Ref. 136) is included as a residential allocation under Policy S6 with a capacity of 80 units. The development of the site shall accord the development principles set out in the development site allocations annex and with other policies of the plan.

2.5 As has been established, the development principles in the Annex to the Plan for land north of Warwick Road, Wolston set out that the new homes shall be for specialist over 55 accommodation or shall comprise bungalows with two or fewer bedrooms. The evidence to underpin this limitation on the housing mix and tenure comprises the Education Topic Paper (December 2025).

2.6 With particular regard to the primary school provision in Wolston, the Education Topic Paper concludes:

*'10.20. Wolston St Margaret CofE Primary School is not projected in the model to exceed capacity, but remains close to capacity. In both 2022-23 and 2023-24, 87% of children at the school were resident in Wolston and The Lawfords Ward. The priority area for the school lies entirely within the ward. This indicates that there is limited capacity for this school to accommodate children from new housing in Wolston by shrinking the area from which it admits children to focus on the priority area. This is further likely to be the case if there is 'push back' from Knightlow CoE Primary School due to new housing in Stretton-on-Dunsmore.'*

*10.21. This supports the advice received from Warwickshire County Council that there is very limited additional capacity for the children from new housing in Wolston to attend the village school.*

*10.27. The model does not present clear evidence of a need to expand primary schools or build new schools, beyond those already planned, to meet the demand for places. The model indicates that the position at Knightlow CofE Primary School and the wider Rugby Rural Primary School Place Planning Area should be kept under review as the plan period progresses.'*

- 2.7 For the Preferred Options Consultation in 2025, Catesby Estates commissioned a specialist consultant (Turley) to undertake a review of the primary school capacity in Wolston (included at **Appendix 3**).
- 2.8 Wolston contains a single primary school – St Margaret’s Church of England Primary School. There are three primary schools within a 2-mile radius of the promotion site, with this distance being significant in the context of the 1996 Education Act which stipulates that this is the furthest a child of primary school age could reasonably be expected to travel.
- 2.9 It is acknowledged that Wolston St Margaret’s Church of England Primary School is currently near to capacity. It is reportedly able to accommodate 210 pupils but had 225 in the last reported academic year (2023/24). However, by contrast, the schools that are located within a 2-mile radius of the promotion site are under capacity. This serves to offset the rise seen at Wolston St Margaret’s if the schools are treated collectively, with a combined pupil roll falling and now standing at c. 81 pupils below their collective capacity.
- 2.10 Warwickshire County Council produces forecasts that estimate pupil numbers up to five years into the future. In the latest WCC Annual Education Sufficiency Update (January 2025), it is anticipated that demand will continue to fall in the “Rugby Rural” planning area that contains all of the nearby schools to Wolston.
- 2.11 Based on the above, there appears to exist – and is forecast to remain – surplus capacity in nearby schools that could theoretically accommodate any demand that would be generated by up to 80 new homes in Wolston, in the event that there is insufficient places at Wolston St Margaret’s and it cannot be expanded.
- 2.12 At this Submission Local Plan Consultation stage of the plan-making process, comments are invited on whether the Local Plan is legally compliant or is sound. In the case of Site 136 Land north of Warwick Road, Wolston, the Council has commissioned an Education Topic Paper which alludes to limited capacity at the only primary school in Wolston and so has restricted the allocation to providing specialist over 55 accommodation or bungalows with two or fewer bedrooms - in an attempt to minimise the pressure of additional school places on St Margaret’s Church of England Primary School.
- 2.13 Catesby Estates generally support the development principles for their site at land north of Warwick Road, Wolston as it is considered that the development principles are evidence-led. Indeed, the updated HEDNA identifies that the older person population is projected to increase notably moving forward. Key

findings for the 2025-43 period include a 29% increase in the population aged 65+ (potentially accounting for 47% of total population growth).

- 2.14 However, Catesby Estates reserve the right to review the position at Knightlow CofE Primary School and the wider Rugby Rural Primary School Place Planning Area with Rugby Borough Council and Warwickshire County Council during the plan period to 2042, in line with the recommendations of the Education Topic Paper.
- 2.15 It is submitted that if pupil numbers continue to fall over the Plan Period and allocated sites in surrounding villages are not delivered, it would be reasonable to revisit the proposed housing mix and tenure for the development proposals at land north of Warwick Road, Wolston on the basis that there will be capacity at primary schools within a two-mile radius.
- 2.16 This position is considered to be further justified by the sustainability credentials of Wolston and the promotion site as revealed in the evidence base supporting the Submission Local Plan Consultation, with the Sustainability Appraisal (December 2025) concluding (at paragraph 5.4.86) that the site is:

*“the next port of call” should the primary school issue be addressed, and otherwise the site is subject to limited constraint, albeit it would extend an already linear built form.*

- 2.17 Furthermore, the updated Stage 2 Site Options Assessment (December 2025) concludes the following for Site 136: Land North of Warwick Road, Wolston:

*‘There are medium ecology constraints and landscape sensitivity is assessed as Medium/Low. Heritage constraints are not flagged. The site provisionally lies within the Grey Belt. The site is a proposed allocation due to the relatively few constraints and good relationship with the village.’*

- 2.18 The evidence base provides a very positive context for Wolston which is clearly a sustainable location to accommodate housing growth in consideration of:
- i. The pressing need for additional housing within Rugby Borough;
  - ii. The limited ability of Rugby Town to accommodate further growth, considering the maximisation of housing delivery on the urban edge of Rugby as part of the adopted Local Plan;
  - iii. The fact that Wolston comprises a Main Rural Settlement and thus comprises one of the most sustainable settlements in the borough but has not been significantly extended as part of the adopted Local Plan.
  - iv. All land surrounding Wolston has been assessed as comprising grey belt land.
- 2.19 Catesby Estates therefore welcome the proposed residential allocation at Land North of Warwick Road, Wolston which is considered to be robustly justified and evidence-led.

### 3.0 POLICY CL1 NET ZERO BUILDINGS

- 3.1 Policy CL1 Net zero buildings sets out that new buildings comprising one or more dwellings must be designed and built to be net zero carbon in operation.
- 3.2 Whilst Catesby Estates agree with the Council that there is a need to act to reduce carbon emissions, Catesby Estates disagree that this needs to be undertaken through the local plan given that there is already a national approach, the emerging Future Homes Standard (FHS).
- 3.3 Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the Borough, in that it provides a single approach that all developers understand and can be rolled out at scale.
- 3.4 However, if the Council chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences and gives consideration as to how the requirements are consistent with the Written Ministerial Statement (WMS) published on the 13th of December 2023 titled “Planning – Local Energy Efficiency Standards Update”.
- 3.5 The approach proposed by the Council is based on energy use, and is inconsistent with the approach set out in the WMS and as such is unsound.
- 3.6 The WMS is extant policy, in force and advises against exceeding national policies. It is something Local Plans and Planning Authorities must take into account (See NPPF para 6). The Ministerial Statement clearly states:

*“The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government’s commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures...”*

- 3.7 While Catesby Estates do not consider the policy to be consistent with national policy we are also concerned that the Council has not properly considered the impact on viability or the deliverability of development. The Council will need to ensure the costs and deliverability of this policy are fully and robustly tested, and there is currently no evidence of this.
- 3.8 While Catesby Estates understands the desire for LPAs to go further, current policy recognises that even where development can viably implement higher standards this must be within a consistent technical framework and approach to assessing building performance against those technical standards. Indeed, this has long been the case in planning policy with paragraph 164b of the NPPF (December 2024) stating that “Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards”.

#### 4.0 POLICY EN6 CANOPY COVER

- 4.1 Policy EN6 (Canopy cover) requires all major development to increase the post-development canopy cover to at least 20% of the site area, excluding areas of the site that are high or very high distinctiveness habitats.
- 4.2 Catesby Estates do not disagree with the broad thrust that the UK has seen a significant loss in woodland and understand the benefits of increasing canopy cover. However, it is important to recognise that in recent years new residential development has not been the driver of declining woodland. The main drivers of declining biodiversity in England, as outlined in the State of Nature Report 2023 (State of Nature Partnership, 2023), are identified as being:

*“Intensive management of agricultural land, largely driven by policies and incentives since World War II, has been identified as the most significant factor driving species’ population change in the UK”.*

- 4.3 Whilst species are in decline, Catesby Estates would suggest that it is not for new development to address the impact of other industries, it is considered that the supporting documents provide a lack of suitable justification of the local need for a 20% canopy cover policy. It is also considered that this is not a necessary policy requirement and can be controlled through the Development Management process.

## 5.0 CONCLUSIONS

- 5.1 The promotion site would be well connected to the built-up area of Wolston, a village with many local services, and would constitute sustainable development.
- 5.2 The pursuit of sustainable development has three dimensions. This proposed development will contribute to the:
1. Economic dimension:
    - Boost the local economy in terms of employment during construction.
    - Benefits to existing services in the local area.
  2. Social dimension:
    - Providing housing to meet identified needs.
    - Providing high quality mix of residential accommodation.
    - Sustainable location for housing.
    - Provide a safe pedestrian and cycle environment within the development.
    - Providing appropriate open spaces within the development.
  3. Environmental dimension:
    - Enhancement of the landscape with increased landscaping and public open space provision.
    - Enhancement and preservation of existing biodiversity habitats located within and adjacent to the site.
- 5.3 There are no environmental or technical constraints that will prevent a site allocation being deliverable.
- 5.4 It is submitted that the planning advantage in the overall public interest lies firmly in favour of allocating the site for residential development as part of a mix of planning allocations to deliver housing needed in the Borough.


## Appendix 1 – Site Location Plan

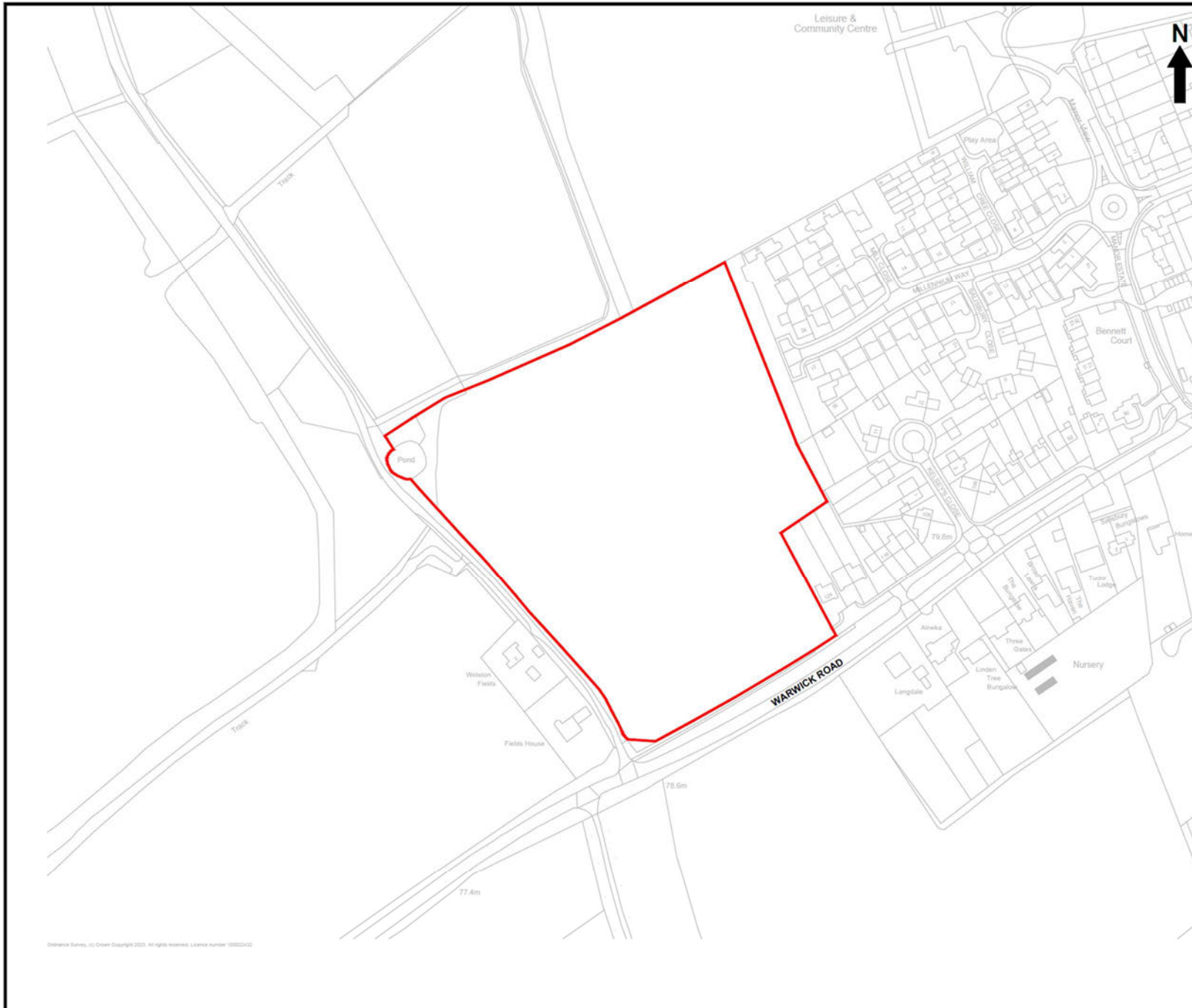
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Leisure & Community Centre



### KEY

 Site Boundary (3.87ha / 9.56ac)



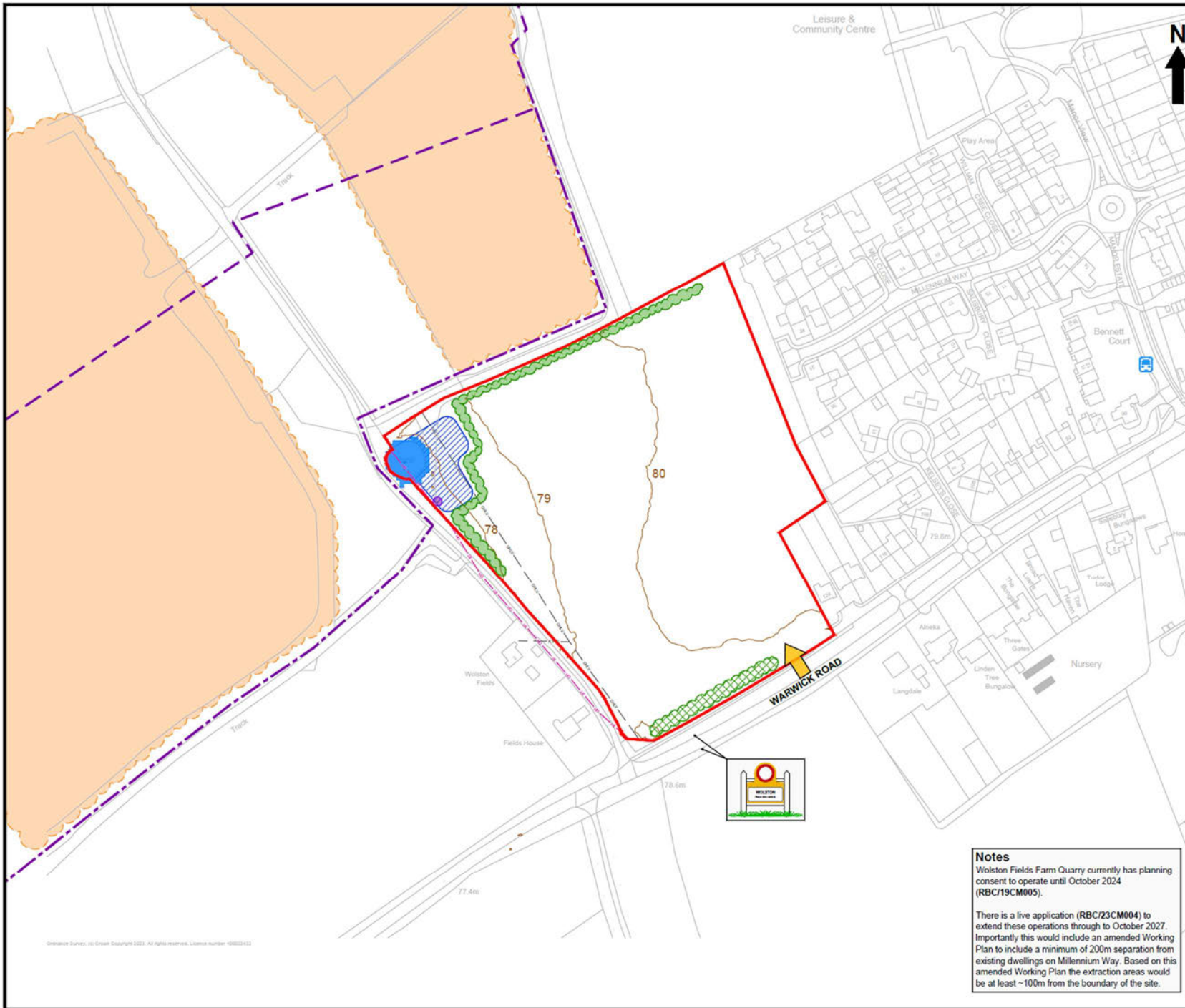
NO.	DATE	DESCRIPTION

PROJECT:-  
**WOLSTON**

TITLE:-  
**SITE BOUNDARY**

SCALE:-	1:2,000 @ A3	DATE:-	16-01-2024	DRAWN:-	TB
STATUS:-	ISSUE	DRAWING NO:-	SK-001	REVISION:-	-

## Appendix 2 – Constraints and Opportunities Plan



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### KEY

- Site Boundary (3.87ha / 9.56ac)
- Constraints**
- Contours (1m, LiDAR)
- Public Right of Way Footpath
- Public Right of Way - Temporary Footpath
- Low Voltage Overhead Line
- BT Openreach Overhead Line
- Surface Water Flood Risk >0.1% annual chance
- Location of Historic Borehole Groundwater not encountered at 4.5m depth
- Wolston Fields Farm Quarry Indicative consented extraction areas, see Notes
- Opportunities**
- Potential All Modes Access
- Potential Village Gateway
- Indicative SuDS Extension of existing pond
- Existing Bus Stop Manor Road, no. 86 service to Rugby and Coventry
- Indicative Landscape Buffer
- Indicative Tree & Hedge Planting

REV	DATE	DESCRIPTION

PROJECT: -  
**WOLSTON**

TITLE: -  
**CONSTRAINTS & OPPORTUNITIES PLAN**

SCALE: -	1:2,000 @ A3	DATE: -	16-01-2024	DRAWN: -	TB
STATUS: -	ISSUE	DRAWING No: -	SK-001	REVISION: -	

**Notes**

Wolston Fields Farm Quarry currently has planning consent to operate until October 2024 (RBC/19CM005).

There is a live application (RBC/23CM004) to extend these operations through to October 2027. Importantly this would include an amended Working Plan to include a minimum of 200m separation from existing dwellings on Millennium Way. Based on this amended Working Plan the extraction areas would be at least ~100m from the boundary of the site.

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### Appendix 3 – Review of Primary School Capacity in Wolston

# Review of Primary School Capacity in Wolston

## Catesby Estates

May 2025

1. Rugby Borough Council (RBC) is currently consulting on Preferred Options for its new Local Plan<sup>1</sup>. It is proposing to allocate only a single site for residential development in the village of Wolston, specifically at Dyers Lane, and anticipates that this will accommodate either 15 self-build plots or specialist housing for older people<sup>2</sup>. It has cited 'primary school capacity' as a 'major issue' restricting further allocations, stating that:

*"...there is no capacity at the [local] school and likely no potential for expansion, such that directing growth to the village would mean that children need to travel to primary school at Ryton-on-Dunsmore or Binley Woods"<sup>3</sup>*

2. Turley has been commissioned by Catesby Estates to review this position, and consider whether there could indeed be capacity to absorb any demand for primary school places that would be generated through the development of around 80 new homes on land that it is promoting on Warwick Road ('the subject site').

### Estimating scale of additional demand

3. Warwickshire County Council (WCC) – in its role as the Local Education Authority (LEA) – has an established method of estimating the demand for school places generated by new housing development<sup>4</sup>. This suggests that a scheme of around 80 new homes, all assumed to contain at least two bedrooms – where smaller homes would be discounted – could generate circa 27 children in need of primary school places.

**Table 1: Estimating Pupil Yield for Residential Scheme in Rugby Borough**

Homes	Pupil yield per academic year per 100 dwellings	Multiplying over 7 academic years (R-Y6)	Number of children needing primary school places
80	4.86	34.02	27.22

Source: WCC; Turley analysis

<sup>1</sup> Rugby Borough Council (March 2025) Rugby Borough Local Plan: Preferred Options Consultation Document

<sup>2</sup> *Ibid*, p112

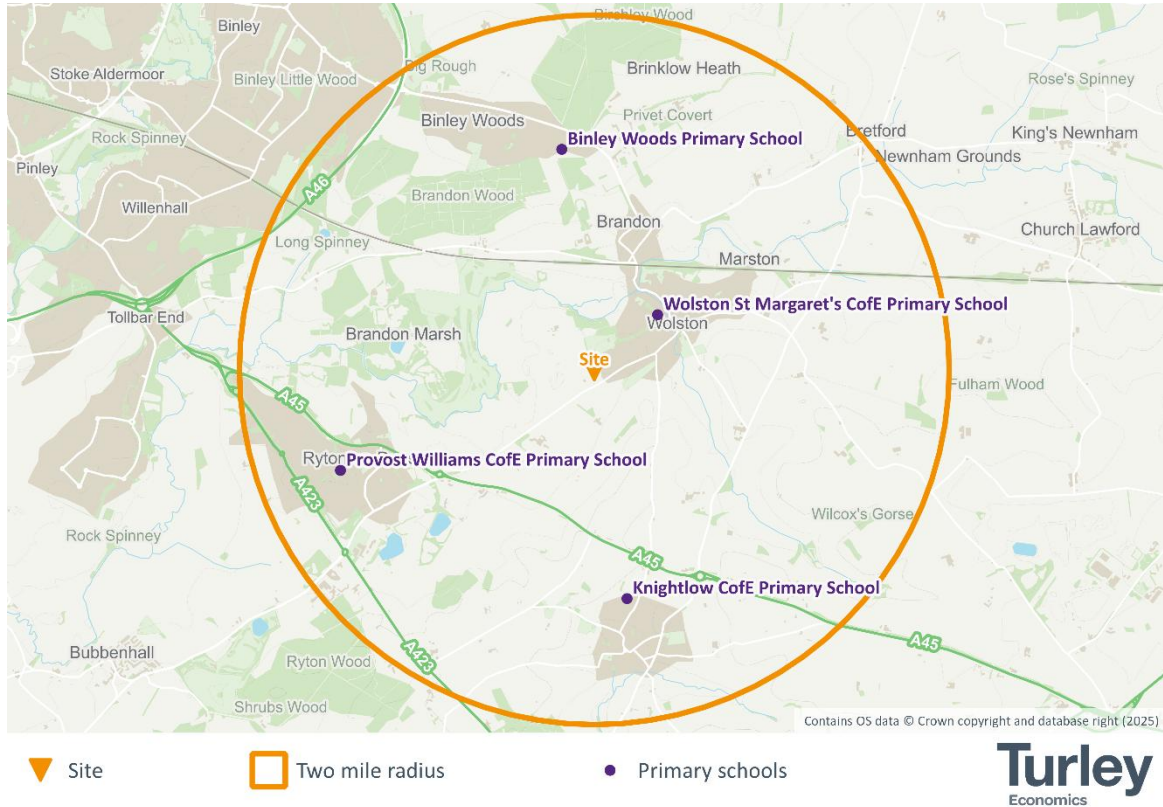
<sup>3</sup> AECOM (March 2025) Sustainability Appraisal of the Rugby Borough Local Plan: Interim SA Report, paragraph 5.4.67

<sup>4</sup> Warwickshire County Council (April 2025) Developers' Guide to Contributions for Education and Early Years Provision, p6

### Introducing nearby provision

4. Wolston is home to a single primary school, namely St Margaret’s Church of England Primary School. There are though a further three within a two-mile radius of the subject site, with this distance being significant in the context of the 1996 Education Act which stipulates that this is the furthest a child of primary school age could be reasonably expected to travel.

**Figure 1: Nearby Primary Schools**



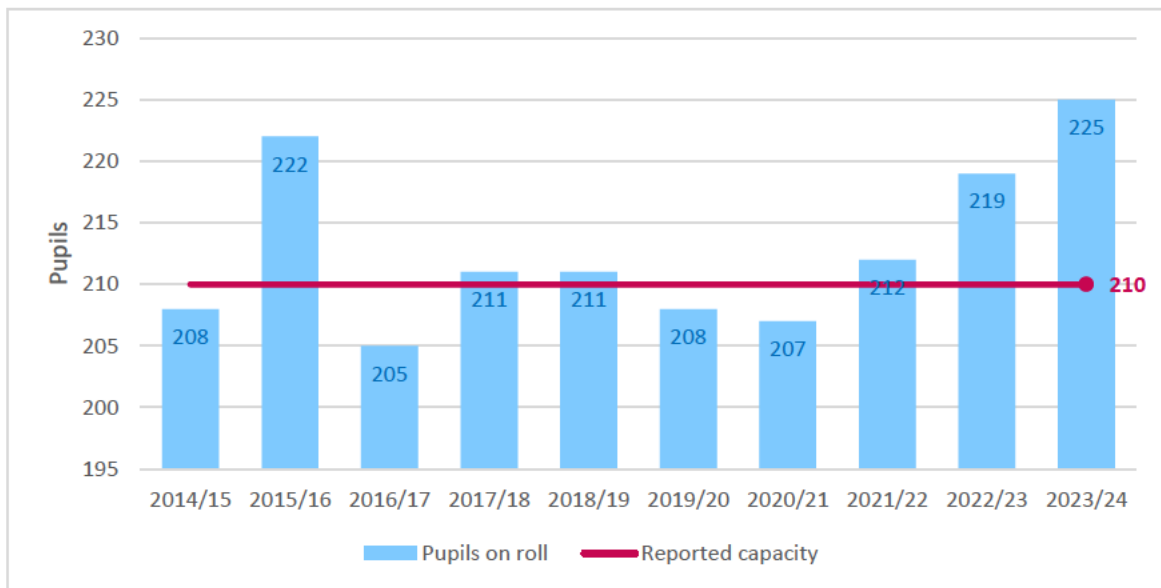
### Capacity of nearby schools

5. RBC is correct in stating that there is currently no spare capacity at Wolston St Margaret’s Church of England Primary School, as the only school in the village. It is reportedly able to accommodate 210 pupils but had 225 in the last reported academic year<sup>5</sup> (2023/24). While this represented the largest pupil roll for at least a decade, it is consistent with a longer-term trend with the school having accommodated an average of 211 pupils over the prior nine years, almost exactly aligning with its reported capacity<sup>6</sup>.

**Figure 2: Pupils Enrolled at Wolston St Margaret’s Church of England Primary School**

<sup>5</sup> Department for Education (June 2024) Schools, pupils and their characteristics

<sup>6</sup> It is unclear why, or indeed actually whether, pupil numbers spiked in 2015/16



Source: Department for Education; Turley analysis

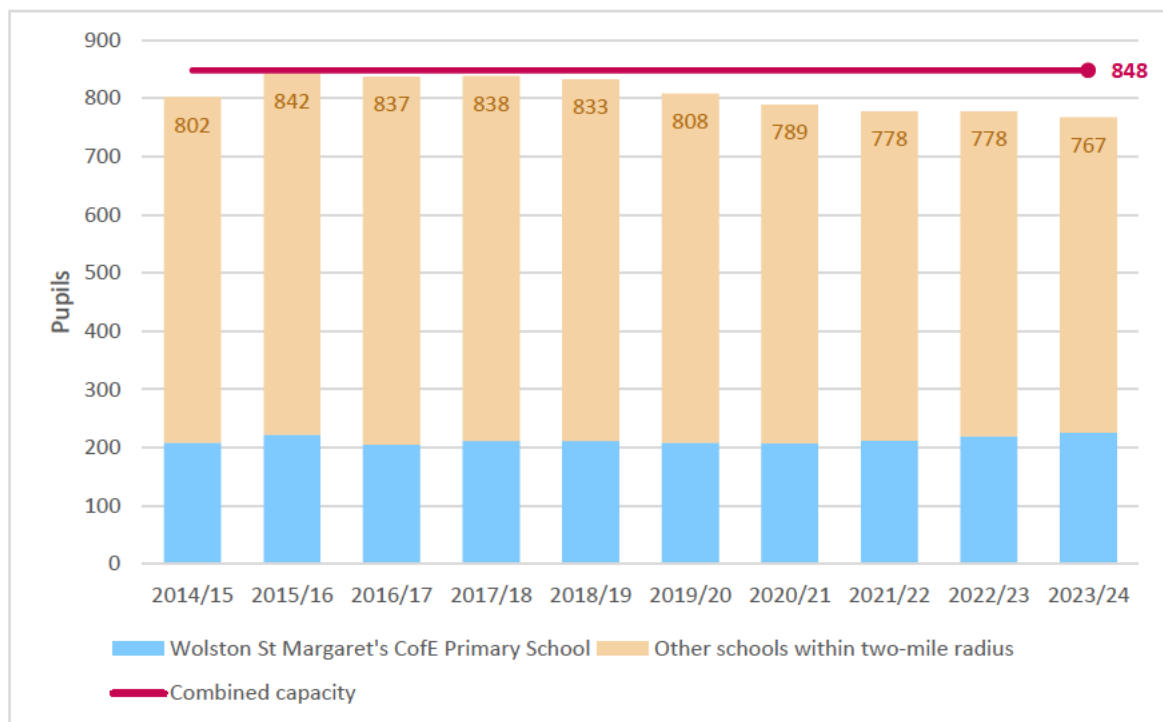
6. This interestingly contrasts with the trend in other nearby schools, all identified at the earlier Figure 1 as being within a two-mile radius of the subject site. These schools were collectively accommodating 632 children as recently as 2016/17 but this has since fallen every year, to the point where 14% fewer children were enrolled in the last one reported<sup>7</sup> (2023/24). This has served to offset the rise seen at Wolston St Margaret’s if the schools are treated collectively, with the combined pupil roll falling and now standing circa 81 pupils below their collective capacity. Equating to nearly 10% of all places, this is approaching double the 5% surplus that WCC seeks to maintain to ‘support operational flexibility...and facilitate parental choice’<sup>8</sup>. It has also more than doubled in size in the space of only five years<sup>9</sup>.

Figure 3: Pupils Enrolled at Nearby Primary Schools

<sup>7</sup> School-level data is tabulated at **Appendix 1**

<sup>8</sup> Warwickshire County Council (April 2025) Developers’ Guide to Contributions for Education and Early Years Provision, p7

<sup>9</sup> Circa 40 unfilled places were reported in 2019/20



Source: Department for Education; Turley analysis

7. This is naturally subject to change, even if it is extremely difficult – and arguably impossible – to robustly project demand over such a long period as is being covered by the new Local Plan, which will look to 2045<sup>10</sup>. WCC does though produce, and each year update, forecasts that estimate pupil numbers up to five years into the future. These are based on ‘GP registration data, existing number of pupils on school rolls, housing development approved at the time of publication, historical parental preference trends and other factors likely to affect admissions to particular schools’<sup>11</sup>.
8. Its latest forecasts – published in January<sup>12</sup> – suggest that demand will continue to fall in the “Rugby Rural” planning area that contains all of the nearby schools, plus one other<sup>13</sup>. They focus exclusively on admissions into reception, complicating any direct comparison with the analysis presented above, but they clearly anticipate five straight years in which fewer children will be enrolled than could be accommodated even with approved housing development being factored in. This suggests that there would technically be capacity for the schools to admit up to 203 extra children into reception over this five-year period to 2029, and up to 169 even if a surplus of 5% was maintained in line with WCC’s policy.

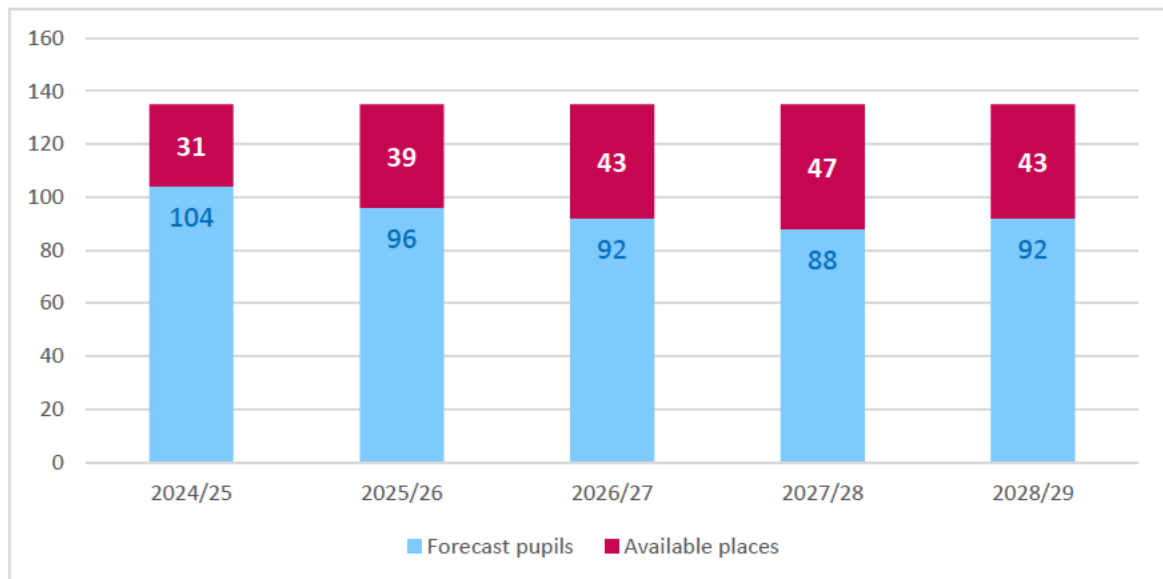
**Figure 4: Forecast Surplus in Rugby Rural Planning Area (2024-29)**

<sup>10</sup> This particularly reflects uncertainties around future birth rates

<sup>11</sup> Warwickshire County Council (April 2025) Developers’ Guide to Contributions for Education and Early Years Provision, p7

<sup>12</sup> Warwickshire County Council (January 2025) Annual Education Sufficiency Update Ages 0-25: Appendices

<sup>13</sup> Our Lady’s Catholic Primary School, Princethorpe – see **Appendix 1** for details on the capacity of this school



Source: WCC

### Accessibility of nearby schools

9. Based on the above, there appears to exist – and is forecast to remain – surplus capacity in nearby schools that could theoretically accommodate any demand that would be generated by up to 80 new homes in Wolston, in the event that there are insufficient places at Wolston St Margaret’s and it cannot be expanded (RBC having claimed, with no apparent evidence, that there is ‘likely no potential’ to do so).
10. There is though the issue of how accessible these other schools actually are from the subject site, as while they are all within a two-mile radius this does not necessarily mean that there is a safe walking route to each one. Indeed, further investigation suggests that it would be challenging to claim that a child could safely walk to *any* of the other nearby schools, as:
  - The closest, **Provost Williams CofE Primary School**, would be less than two miles away on foot but the journey would unavoidably include Warwick Road which lacks street lighting and has a very narrow pavement in places;
  - The route to **Knightlow CofE Primary School** would only be around two miles if a child was to walk down Stretton Road – which has no pavement – and then traverse London Road (A45) across a designated but uncontrolled crossing; and
  - The route to **Binley Woods Primary School** would be continuously paved but slightly longer than two miles, requiring a walk through Wolston and Brandon onto Rugby Road (A428).
11. While this does limit the prospect of these schools themselves helping to accommodate demand generated by the subject site, they could still form an important part of a solution. If Wolston St Margaret’s is currently admitting children that live within a reasonable distance of these other schools – and cannot expand to keep doing so – there is a scenario in which the other schools would accommodate at least some such children in future, where WCC’s allocations policy would

likely give children living on the subject site greater priority<sup>14</sup>. This would arguably even benefit those nearby schools that are seeing pupil numbers fall – like Provost Williams and Binley Woods – by unlocking a new source of demand and thus helping to sustain them into the future.

12. RBC is strongly advised to consider this scenario further, liaising with WCC to obtain more detailed admissions data than is publicly reported and so determine the extent to which Wolston St Margaret’s currently admits children that could in future be enrolled at undersubscribed schools closer to their homes. It is also advised to explore the availability of forecasts for Wolston St Margaret’s itself, as opposed to the wider planning area, so as to understand whether pupil numbers are indeed likely to fall in the coming years. Only with this information can RBC make an informed judgement on whether Wolston can accommodate new housing development over the period to 2045, having arguably been premature and influenced only by *current* trends in claiming that it cannot.

### **Summary and conclusions**

13. RBC is proposing to severely limit the number of residential allocations that it makes in the village of Wolston, through its new Local Plan, having expressed concern about the capacity of the local primary school.
14. This appears to have been based on an overly simplistic interpretation of the current position. While the local school is indeed operating beyond its reported capacity, and has generally done so throughout the last decade, this will not necessarily remain the case over the period to 2045. It is one of five schools collectively forecast to see admissions drop over the next five years alone.
15. Several of the other nearby schools are already seeing pupil numbers fall, leaving a growing number of unfilled places. While a lack of safe walking routes could prevent them from accommodating demand generated by new housing in Wolston, they could still help to meet demand that has *historically* been met by its local school, some of which could well have come from families living closer to them. This would free up places for new residents of the village, including up to 27 children that could live in circa 80 homes proposed on the site being promoted by Catesby Estates. Even this would not be necessary if the school could be expanded, with RBC having seemingly not given proper consideration to this potential solution.
16. RBC is advised to not only explore the feasibility of expansion but also work with WCC to determine the extent to which Wolston’s primary school admits children that could in future be enrolled at undersubscribed schools closer to their homes. It should also confirm the availability of forecasts for the school itself, to ascertain whether pupil numbers are likely to reduce from their current level. Only with this information can it make an informed judgement on whether Wolston can accommodate new housing development over the period to 2045, having arguably been premature and influenced only by current trends in claiming that it cannot.

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<sup>14</sup> Warwickshire County Council (2024) Admission Arrangements 2025/26 for Community and Voluntary Controlled Schools. This confirms that children living in a school’s “priority area” will be given greater priority than those living elsewhere, even if a sibling is already enrolled

**Contact**

Andrew Lowe



May 2025

03192

## Appendix 1: Pupil Numbers at Nearby Schools

Closest to subject site →				
	Provost Williams CofE Primary School	Knightlow CofE Primary School	Binley Woods Primary School	Our Lady Catholic Primary School, Princethorpe <sup>15</sup>
Distance <sup>16</sup>	1.8 miles	2.0 miles	2.1 miles	3.5 miles
Capacity	<b>210</b>	<b>218</b>	<b>210</b>	<b>119</b>
2014/15	183	211	200	121
2015/16	208	211	201	121
2016/17	217	211	204	120
2017/18	208	215	204	120
2018/19	200	221	201	122
2019/20	180	218	202	112
2020/21	181	213	188	105
2021/22	173	218	175	109
2022/23	162	218	179	108
<b>2023/24</b>	<b>138</b>	<b>219</b>	<b>185</b>	<b>104</b>
Unfilled places	72	0	25	15
%	34%	0%	12%	13%
KEY	Over capacity		Under capacity	


<sup>15</sup> Beyond a two-mile radius but part of the “Rugby Rural” planning area defined by WCC

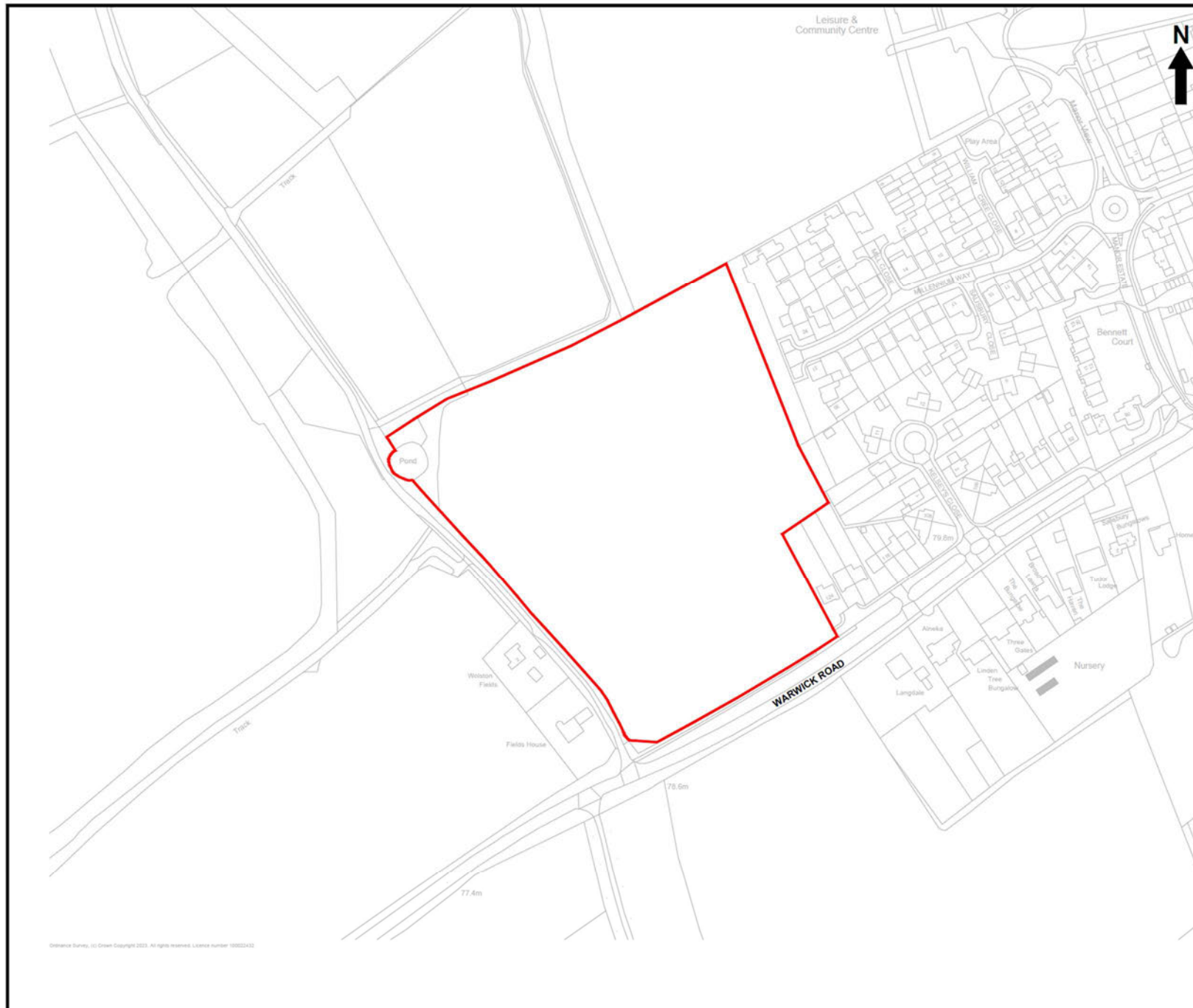
<sup>16</sup> Approximate walking distance, calculated using Google Maps

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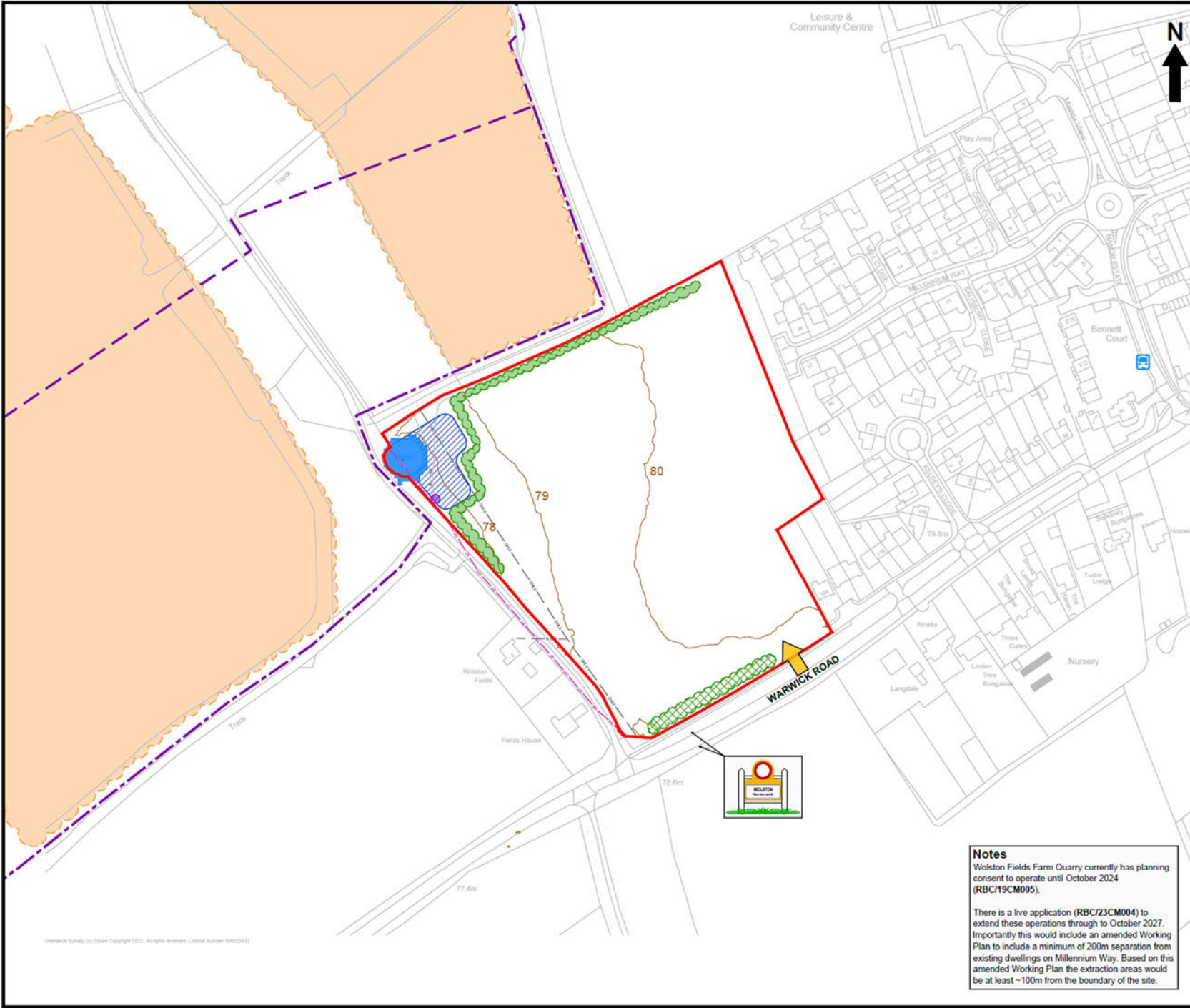
**KEY**

 Site Boundary (3.87ha / 9.56ac)


















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NO.	DATE	DESCRIPTION
PROJECT:-		
WOLSTON		
TITLE:-		
SITE BOUNDARY		
SCALE:-	1:2,000 @ A3	DATE:- 16-01-2024
STATUS:-	ISSUE	ISSUE NO:- SK-001
DESIGNED BY:-		REVISION:-

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**KEY**

-  Site Boundary (3.87ha / 9.56ac)
- Constraints**
-  Contours (1m, LiDAR)
-  Public Right of Way  
*Footpath*
-  Public Right of Way - Temporary  
*Footpath*
-  Low Voltage Overhead Line
-  BT Openreach Overhead Line
-  Surface Water Flood Risk  
*>0.1% annual chance*
-  Location of Historic Borehole  
*Groundwater not encountered at 4.5m depth*
-  Wolston Fields Farm Quarry  
*Indicative consented extraction areas, see Notes*
- Opportunities**
-  Potential All Modes Access
-  Potential Village Gateway
-  Indicative SuDS  
*Extension of existing pond*
-  Existing Bus Stop  
*Manor Road, no. 86 service to Rugby and Coventry*
-  Indicative Landscape Buffer
-  Indicative Tree & Hedge Planting

REV	DATE	DESCRIPTION

PROJECT -  
**WOLSTON**

TITLE -  
**CONSTRAINTS & OPPORTUNITIES PLAN**

SCALE -	1:2,000 @ A3	DATE -	16-01-2024	DRAWN -	TB
STATUS -	ISSUE	DRAWING No -	SK-001	REVISION -	-

**Notes**  
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# Review of Primary School Capacity in Wolston

## Catesby Estates

May 2025

1. Rugby Borough Council (RBC) is currently consulting on Preferred Options for its new Local Plan<sup>1</sup>. It is proposing to allocate only a single site for residential development in the village of Wolston, specifically at Dyers Lane, and anticipates that this will accommodate either 15 self-build plots or specialist housing for older people<sup>2</sup>. It has cited 'primary school capacity' as a 'major issue' restricting further allocations, stating that:

*"...there is no capacity at the [local] school and likely no potential for expansion, such that directing growth to the village would mean that children need to travel to primary school at Ryton-on-Dunsmore or Binley Woods"<sup>3</sup>*

2. Turley has been commissioned by Catesby Estates to review this position, and consider whether there could indeed be capacity to absorb any demand for primary school places that would be generated through the development of around 80 new homes on land that it is promoting on Warwick Road ('the subject site').

### Estimating scale of additional demand

3. Warwickshire County Council (WCC) – in its role as the Local Education Authority (LEA) – has an established method of estimating the demand for school places generated by new housing development<sup>4</sup>. This suggests that a scheme of around 80 new homes, all assumed to contain at least two bedrooms – where smaller homes would be discounted – could generate circa 27 children in need of primary school places.

**Table 1: Estimating Pupil Yield for Residential Scheme in Rugby Borough**

Homes	Pupil yield per academic year per 100 dwellings	Multiplying over 7 academic years (R-Y6)	Number of children needing primary school places
80	4.86	34.02	27.22

Source: WCC; Turley analysis

<sup>1</sup> Rugby Borough Council (March 2025) Rugby Borough Local Plan: Preferred Options Consultation Document

<sup>2</sup> *Ibid*, p112

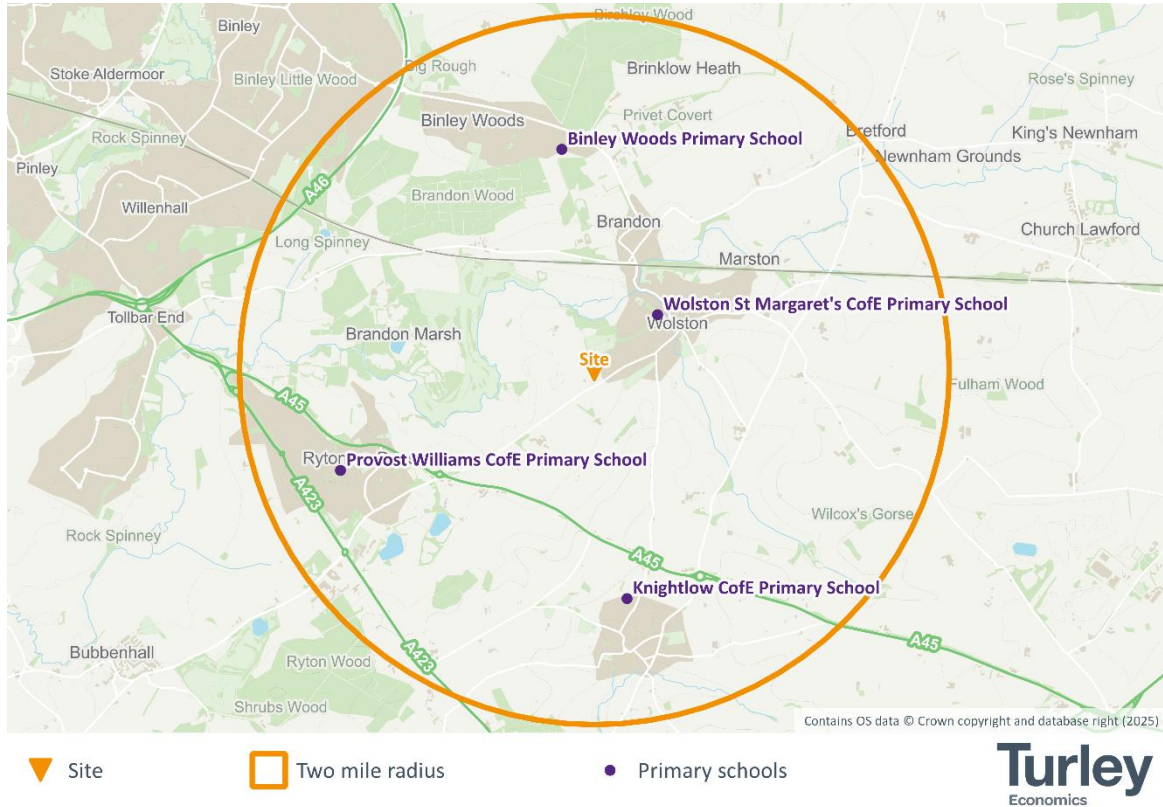
<sup>3</sup> AECOM (March 2025) Sustainability Appraisal of the Rugby Borough Local Plan: Interim SA Report, paragraph 5.4.67

<sup>4</sup> Warwickshire County Council (April 2025) Developers' Guide to Contributions for Education and Early Years Provision, p6

**Introducing nearby provision**

- 4. Wolston is home to a single primary school, namely St Margaret’s Church of England Primary School. There are though a further three within a two-mile radius of the subject site, with this distance being significant in the context of the 1996 Education Act which stipulates that this is the furthest a child of primary school age could be reasonably expected to travel.

**Figure 1: Nearby Primary Schools**



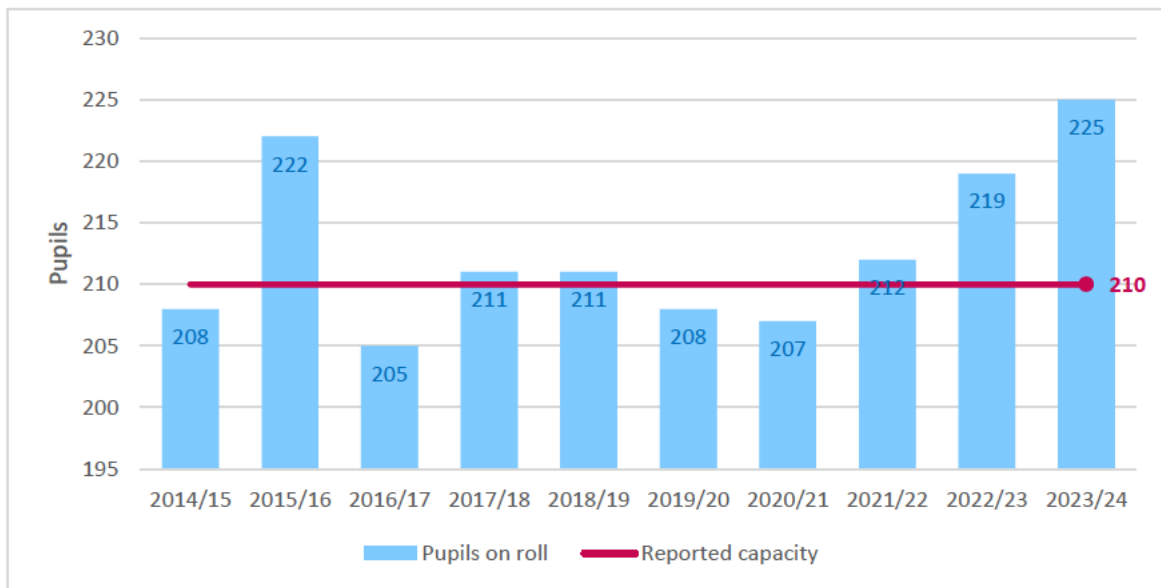
**Capacity of nearby schools**

- 5. RBC is correct in stating that there is currently no spare capacity at Wolston St Margaret’s Church of England Primary School, as the only school in the village. It is reportedly able to accommodate 210 pupils but had 225 in the last reported academic year<sup>5</sup> (2023/24). While this represented the largest pupil roll for at least a decade, it is consistent with a longer-term trend with the school having accommodated an average of 211 pupils over the prior nine years, almost exactly aligning with its reported capacity<sup>6</sup>.

**Figure 2: Pupils Enrolled at Wolston St Margaret’s Church of England Primary School**

<sup>5</sup> Department for Education (June 2024) Schools, pupils and their characteristics

<sup>6</sup> It is unclear why, or indeed actually whether, pupil numbers spiked in 2015/16



Source: Department for Education; Turley analysis

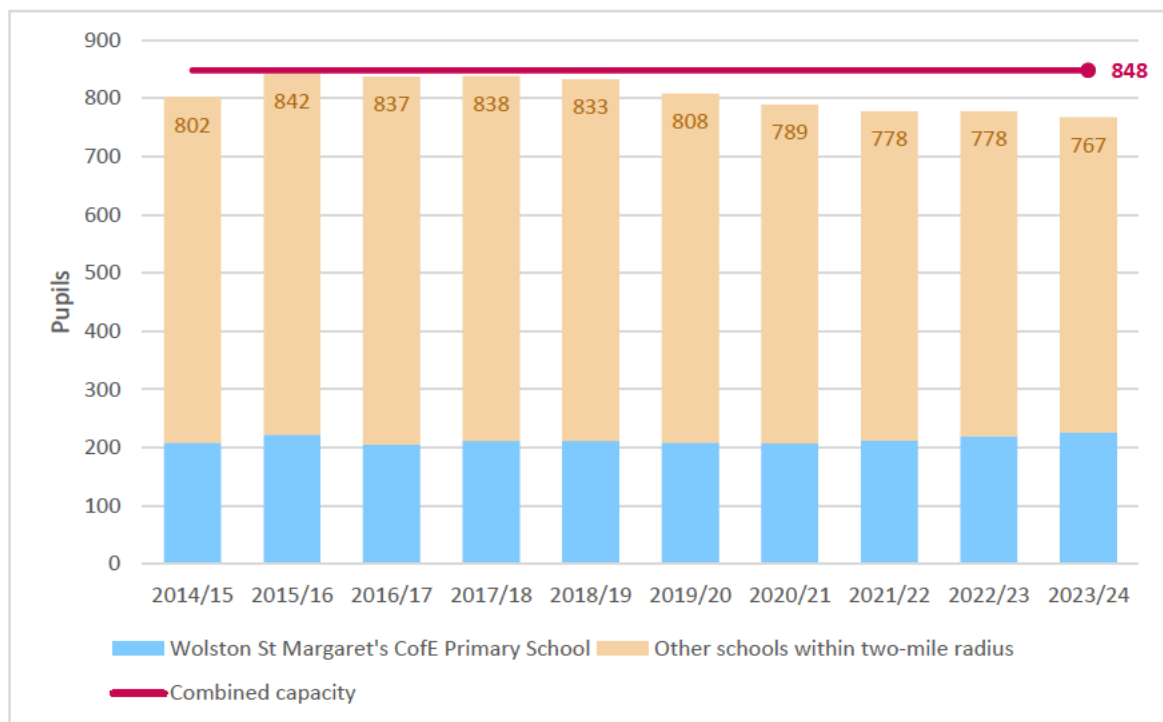
6. This interestingly contrasts with the trend in other nearby schools, all identified at the earlier Figure 1 as being within a two-mile radius of the subject site. These schools were collectively accommodating 632 children as recently as 2016/17 but this has since fallen every year, to the point where 14% fewer children were enrolled in the last one reported<sup>7</sup> (2023/24). This has served to offset the rise seen at Wolston St Margaret’s if the schools are treated collectively, with the combined pupil roll falling and now standing circa 81 pupils below their collective capacity. Equating to nearly 10% of all places, this is approaching double the 5% surplus that WCC seeks to maintain to ‘support operational flexibility...and facilitate parental choice’<sup>8</sup>. It has also more than doubled in size in the space of only five years<sup>9</sup>.

Figure 3: Pupils Enrolled at Nearby Primary Schools

<sup>7</sup> School-level data is tabulated at **Appendix 1**

<sup>8</sup> Warwickshire County Council (April 2025) Developers’ Guide to Contributions for Education and Early Years Provision, p7

<sup>9</sup> Circa 40 unfilled places were reported in 2019/20



Source: Department for Education; Turley analysis

7. This is naturally subject to change, even if it is extremely difficult – and arguably impossible – to robustly project demand over such a long period as is being covered by the new Local Plan, which will look to 2045<sup>10</sup>. WCC does though produce, and each year update, forecasts that estimate pupil numbers up to five years into the future. These are based on ‘GP registration data, existing number of pupils on school rolls, housing development approved at the time of publication, historical parental preference trends and other factors likely to affect admissions to particular schools’<sup>11</sup>.
8. Its latest forecasts – published in January<sup>12</sup> – suggest that demand will continue to fall in the “Rugby Rural” planning area that contains all of the nearby schools, plus one other<sup>13</sup>. They focus exclusively on admissions into reception, complicating any direct comparison with the analysis presented above, but they clearly anticipate five straight years in which fewer children will be enrolled than could be accommodated even with approved housing development being factored in. This suggests that there would technically be capacity for the schools to admit up to 203 extra children into reception over this five-year period to 2029, and up to 169 even if a surplus of 5% was maintained in line with WCC’s policy.

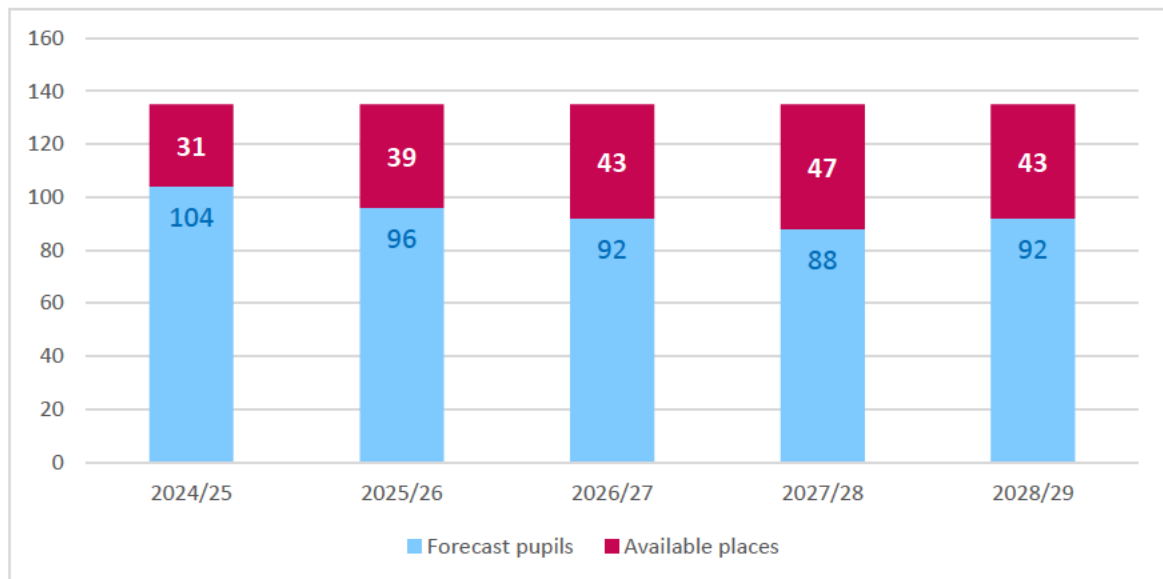
**Figure 4: Forecast Surplus in Rugby Rural Planning Area (2024-29)**

<sup>10</sup> This particularly reflects uncertainties around future birth rates

<sup>11</sup> Warwickshire County Council (April 2025) Developers’ Guide to Contributions for Education and Early Years Provision, p7

<sup>12</sup> Warwickshire County Council (January 2025) Annual Education Sufficiency Update Ages 0-25: Appendices

<sup>13</sup> Our Lady’s Catholic Primary School, Princethorpe – see **Appendix 1** for details on the capacity of this school



Source: WCC

### Accessibility of nearby schools

9. Based on the above, there appears to exist – and is forecast to remain – surplus capacity in nearby schools that could theoretically accommodate any demand that would be generated by up to 80 new homes in Wolston, in the event that there are insufficient places at Wolston St Margaret’s and it cannot be expanded (RBC having claimed, with no apparent evidence, that there is ‘likely no potential’ to do so).
10. There is though the issue of how accessible these other schools actually are from the subject site, as while they are all within a two-mile radius this does not necessarily mean that there is a safe walking route to each one. Indeed, further investigation suggests that it would be challenging to claim that a child could safely walk to *any* of the other nearby schools, as:
  - The closest, **Provost Williams CofE Primary School**, would be less than two miles away on foot but the journey would unavoidably include Warwick Road which lacks street lighting and has a very narrow pavement in places;
  - The route to **Knightlow CofE Primary School** would only be around two miles if a child was to walk down Stretton Road – which has no pavement – and then traverse London Road (A45) across a designated but uncontrolled crossing; and
  - The route to **Binley Woods Primary School** would be continuously paved but slightly longer than two miles, requiring a walk through Wolston and Brandon onto Rugby Road (A428).
11. While this does limit the prospect of these schools themselves helping to accommodate demand generated by the subject site, they could still form an important part of a solution. If Wolston St Margaret’s is currently admitting children that live within a reasonable distance of these other schools – and cannot expand to keep doing so – there is a scenario in which the other schools would accommodate at least some such children in future, where WCC’s allocations policy would

likely give children living on the subject site greater priority<sup>14</sup>. This would arguably even benefit those nearby schools that are seeing pupil numbers fall – like Provost Williams and Binley Woods – by unlocking a new source of demand and thus helping to sustain them into the future.

12. RBC is strongly advised to consider this scenario further, liaising with WCC to obtain more detailed admissions data than is publicly reported and so determine the extent to which Wolston St Margaret’s currently admits children that could in future be enrolled at undersubscribed schools closer to their homes. It is also advised to explore the availability of forecasts for Wolston St Margaret’s itself, as opposed to the wider planning area, so as to understand whether pupil numbers are indeed likely to fall in the coming years. Only with this information can RBC make an informed judgement on whether Wolston can accommodate new housing development over the period to 2045, having arguably been premature and influenced only by *current* trends in claiming that it cannot.

### **Summary and conclusions**

13. RBC is proposing to severely limit the number of residential allocations that it makes in the village of Wolston, through its new Local Plan, having expressed concern about the capacity of the local primary school.
14. This appears to have been based on an overly simplistic interpretation of the current position. While the local school is indeed operating beyond its reported capacity, and has generally done so throughout the last decade, this will not necessarily remain the case over the period to 2045. It is one of five schools collectively forecast to see admissions drop over the next five years alone.
15. Several of the other nearby schools are already seeing pupil numbers fall, leaving a growing number of unfilled places. While a lack of safe walking routes could prevent them from accommodating demand generated by new housing in Wolston, they could still help to meet demand that has *historically* been met by its local school, some of which could well have come from families living closer to them. This would free up places for new residents of the village, including up to 27 children that could live in circa 80 homes proposed on the site being promoted by Catesby Estates. Even this would not be necessary if the school could be expanded, with RBC having seemingly not given proper consideration to this potential solution.
16. RBC is advised to not only explore the feasibility of expansion but also work with WCC to determine the extent to which Wolston’s primary school admits children that could in future be enrolled at undersubscribed schools closer to their homes. It should also confirm the availability of forecasts for the school itself, to ascertain whether pupil numbers are likely to reduce from their current level. Only with this information can it make an informed judgement on whether Wolston can accommodate new housing development over the period to 2045, having arguably been premature and influenced only by current trends in claiming that it cannot.

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<sup>14</sup> Warwickshire County Council (2024) Admission Arrangements 2025/26 for Community and Voluntary Controlled Schools. This confirms that children living in a school’s “priority area” will be given greater priority than those living elsewhere, even if a sibling is already enrolled

**Contact**

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May 2025

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## Appendix 1: Pupil Numbers at Nearby Schools

Closest to subject site →				
	Provost Williams CofE Primary School	Knightlow CofE Primary School	Binley Woods Primary School	Our Lady Catholic Primary School, Princethorpe <sup>15</sup>
Distance <sup>16</sup>	1.8 miles	2.0 miles	2.1 miles	3.5 miles
Capacity	<b>210</b>	<b>218</b>	<b>210</b>	<b>119</b>
2014/15	183	211	200	121
2015/16	208	211	201	121
2016/17	217	211	204	120
2017/18	208	215	204	120
2018/19	200	221	201	122
2019/20	180	218	202	112
2020/21	181	213	188	105
2021/22	173	218	175	109
2022/23	162	218	179	108
<b>2023/24</b>	<b>138</b>	<b>219</b>	<b>185</b>	<b>104</b>
Unfilled places	72	0	25	15
%	34%	0%	12%	13%
KEY	Over capacity		Under capacity	

<sup>15</sup> Beyond a two-mile radius but part of the “Rugby Rural” planning area defined by WCC

<sup>16</sup> Approximate walking distance, calculated using Google Maps