

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Joanne"/>	<input type="text"/>
Last Name	<input type="text" value="Coope"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Line 2	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Telephone Number	<input type="text" value="[REDACTED]"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="[REDACTED]"/>	<input type="text"/>

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?

Paragraph	PP137	Policy		Policies Map	
Site ID	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.

I believe the allocation of **Site 358 (Land at Coventry Road, Wolvey)** is **unsound** and not justified for the following reasons:

- **Inconsistency with Green Belt Policy:** The site is located within the Green Belt. Allocating it for housing is contrary to national Government Policy, which is designed to prevent urban sprawl and protect the setting of rural villages.
- **Contradiction of Sustainability Evidence:** The Council's own Sustainability Appraisal identifies Wolvey as a "notably small main rural settlement with a low settlement score". To allocate 60 homes here ignores this evidence, as the village lacks the scale and infrastructure to support this level of growth sustainably.

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.

To make the Local Plan sound and consistent with national policy, the following modifications are required:

- **Policy PP137 should be amended to delete Site 358** as a proposed allocation for 60 homes.
- **Alternative sites should be identified in strategically preferable locations.** Development should be directed towards areas with stronger existing infrastructure, such as those adjacent to the primary urban areas of Rugby or Coventry, rather than remote rural settlements.

Removing this site ensures the plan remains justified and aligns with the Council's own sustainability findings regarding Wolvey's limited capacity.

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

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

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

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

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

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

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

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

Part A

1. Personal Details*

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2. Agent's Details (if applicable)

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Joanne"/>	<input type="text"/>
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E-mail Address	<input type="text" value="[REDACTED]"/>	<input type="text"/>

(where relevant)

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?

Paragraph	<input type="text"/>	Policy	<input type="text" value="S6"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="309 & 358"/>				

4. Do you consider the Local Plan:

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

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.

I believe the allocation of Land north of B4109 is **unsound** as it is neither justified nor consistent with national policy for the following reasons:

- **Inconsistency with Green Belt Policy:** The proposed allocation is within the Green Belt. Developing this site is contrary to national Government Policy intended to protect these areas from urban sprawl and preserve the setting of rural settlements.
- **Lack of Justification regarding Landscape Sensitivity:** Previous landscape studies have categorised this land as having 'High sensitivity to housing development'. Ignoring these suggests the plan is not based on a proportionate evidence base.
- **Failure to Account for Settlement Scale:** The Council's own Sustainability Appraisal identifies Wolvey as a "notably small rural settlement with a low settlement score". A development of this scale is disproportionate to the village's character and infrastructure, making the plan unsustainable in its current form.
- **Insufficient Ecological Assessment:** The site abuts a Local Wildlife Site, yet there has not been a sufficient assessment of the ecological impacts. Without this, the plan cannot be considered justified in terms of environmental protection.
- **Infrastructure Constraints:** The plan fails to demonstrate how local infrastructure—specifically the primary school, GP surgery, and extremely limited public transport—can absorb the pressure of up to 210 additional

homes in the village. This lack of clear delivery planning renders the allocation unsound.

(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.

To make the Local Plan sound and consistent with national policy, the following modifications are necessary:

- **Policy S6 should be amended to delete the proposed allocation of 150 homes at 'Land north of B4109, Wolvey'. The Council should instead identify alternative sites in strategically preferable locations.** Development should be directed towards areas with better existing infrastructure and lower landscape sensitivity, such as locations adjacent to the primary urban areas of Rugby and/or Coventry.

Removing this allocation would ensure the plan aligns with Green Belt protections and the Council's own findings regarding Wolvey's limited settlement score and infrastructure capacity.

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

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

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Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
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Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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?

Paragraph	PP138	Policy		Policies Map	
Site ID	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.

I believe the allocation of **Site 309 (Land north of B4109, Wolvey)** is **unsound** for the following reasons:

- **Disproportionate Scale:** Adding 150 new homes (with potential total for up to 210) is of a scale entirely disproportionate to the current village and 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.
- **Green Belt Protection:** The proposed allocation is situated within the Green Belt, which is contrary to national Government Policy.
- **Landscape Sensitivity:** Previous studies have indicated that this land has 'High sensitivity to housing development', making it unsuitable for this type of project.
- **Ecological Risk:** Part of the site abuts a Local Wildlife Site, yet there has been no sufficient assessment of the ecological impacts.
- **Infrastructure Pressure:** The village infrastructure cannot sustain this growth. It would place unmanageable pressure on the primary school, GP practice, and the already very limited public transport availability.
- **Evidence Base:** The Council's own Sustainability Appraisal identifies Wolvey as a "notably small main rural settlement with a low settlement score," which contradicts the decision to allocate such a high number of homes here.

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.

To make the Local Plan sound and consistent with national policy, the following modifications are necessary:

- **Policy PP138 should be amended to delete Site 309** as a proposed allocation of 150 homes at 'Land north of B4109, Wolvey'.
- **The Council should consider alternative sites in strategically preferable locations.** Growth should be directed toward areas adjacent to the urban centres of Rugby or Coventry, where infrastructure and accessibility can better support development.

By removing this allocation, the plan would better align with the Council's own sustainability evidence and protect the rural character of Wolvey.

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

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Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Joanne"/>	<input type="text"/>
Last Name	<input type="text" value="Coope"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="[REDACTED]"/>	<input type="text"/>
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Telephone Number	<input type="text" value="[REDACTED]"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="[REDACTED]"/>	<input type="text"/>

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?

Paragraph		Policy	S5	Policies Map	
Site ID	309 & 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.

I consider **Policy S5** to be **unsound** because it is not justified and is inconsistent with national policy regarding the protection of the Green Belt:

- **Failure to Protect Green Belt:** The Draft Local Plan proposes allocating approximately 1,500 new homes on land that would require release from the established Green Belt. This approach fails to uphold the fundamental purpose of the Green Belt, which is to prevent urban sprawl and safeguard the countryside from encroachment.
- **Availability of Sustainable Alternatives:** There are viable development options outside of the Green Belt that have not been fully explored. A sound plan should prioritise these locations before considering the release of protected land.
- **Contrived Evidence Base:** The Council's attempts to reclassify large swathes of the Green Belt as "Grey Belt" feel contrived. These areas continue to serve a vital role in safeguarding our rural landscape and should remain protected under established policy.

(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.

To make the Local Plan sound and legally compliant, the following modifications are necessary:

- **Align allocations strictly with the National Planning Policy Framework (NPPF).** The plan should be modified to ensure that changes to Green Belt boundaries are only permitted in truly exceptional circumstances.
- **Prioritise non-Green Belt sites.** The Council should revise Policy S5 to focus on development options in strategically preferable locations that do not compromise protected Green Belt land.

These modifications would ensure the plan is justified by a sustainable strategy and remains consistent with national environmental protections.

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

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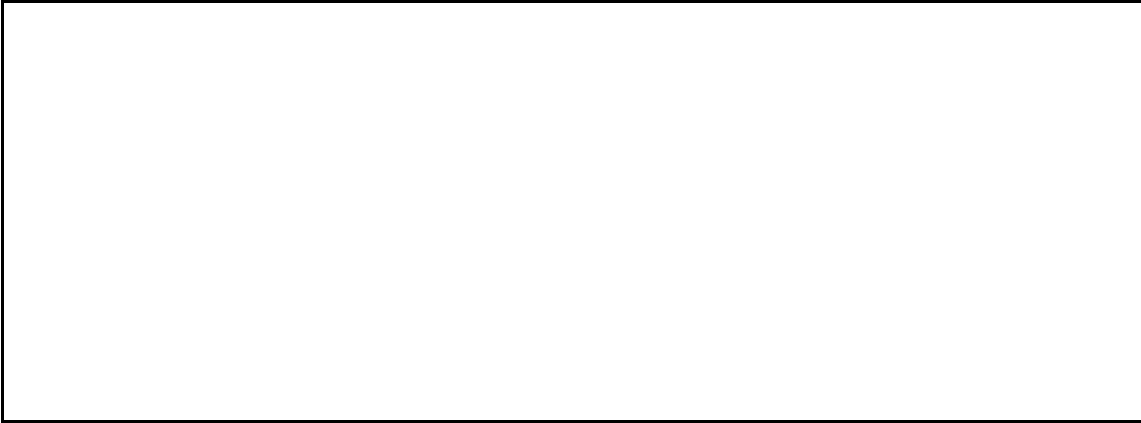
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No **No**, I do not wish to participate in hearing session(s)

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

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Telephone Number	<input type="text" value="██████████"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="████████████████████"/>	<input type="text"/>

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

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="S2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="309 & 358"/>				

4. Do you consider the Local Plan:

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

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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.

I consider **Policy S2** to be **unsound** as it creates an unsustainable pattern of development that is not justified by the evidence base:

- **Contradictory Development Strategy:** While the stated preferred strategy is one of "Urban Concentration," the actual allocations do not reflect this. Proposing nearly 58% of new housing allocations in rural areas directly undermines the core objective of focusing growth in well-served urban hubs.
- **Lack of Justification for Rural Growth:** The evidence provided does not support such a heavy emphasis on rural development. Directing the majority of new housing to remote locations, over and above existing permissions and previous plan allocations, is inconsistent with sustainable planning principles.

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

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To make the Local Plan sound and consistent with its own strategic objectives, the following modifications are required:

- **Realign housing allocations with the Urban Concentration strategy.** A greater proportion of growth should be directed toward the urban areas of Rugby and Coventry, where infrastructure can better support it.
- **Reduce allocations in remote rural areas.** The proposed numbers for Wolvey and other similarly remote villages should be scaled back significantly to reflect their limited services and sustainability.
- **Prioritise superior strategic alternatives.** The Council should identify and utilise alternative sites that offer better sustainability and strategic alignment than the current rural-heavy focus.

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

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

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

(where relevant)

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?

Paragraph	<input type="text"/>	Policy	<input type="text" value="S1"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="309 & 358"/>				

4. Do you consider the Local Plan:

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

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.

I consider **Policy S1** to be **unsound** as it is not justified by the supporting evidence. Specifically:

- **Strategic Misalignment:** The Rugby Urban Area should accommodate the majority of new growth. Redirecting significant development to remote, less well-served rural areas like Wolvey is not a justified strategy for sustainable growth.
- **Inconsistent Definition of 'Main Rural Settlements':** The classification of Wolvey within this category is not sound. Wolvey is the smallest and least well-served of all the rural villages, yet it has been given the third-highest housing allocation. This distribution is disproportionate and lacks a clear evidence-based justification.
- **Environmental Sustainability and Car Dependency:** Due to the very limited public transport available in Wolvey, a development of this size will inevitably lead to high car dependency. This will result in a significant increase in local traffic, which is at odds with national and local goals for sustainable development and reducing carbon emissions.

(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.

To make the Local Plan sound, the following modifications are required:

- **Reclassify Wolvey within the settlement hierarchy.** Based on its limited services, facilities, employment opportunities, and poor public transport links, Wolvey should be moved to a lower category that accurately reflects its status as a small, remote rural village.
- **Reduce the housing allocation for Wolvey.** The current proposed growth is disproportionate to the village's infrastructure. The allocation should be adjusted to a level that is sustainable and consistent with a lower-tier settlement.

By making these changes, the plan would be better justified and more aligned with the actual capacity of the village to accommodate growth.

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

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

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

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

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

Name or Organisation:

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

Paragraph		Policy	I4	Policies Map	
Site ID	309 & 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

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I consider **Policy I4** to be **unsound** because the scale of development proposed for Wolvey is not supported by the existing infrastructure, making the plan unsustainable and unjustified:

- **Education Constraints:** The local primary school is already near capacity and cannot accommodate the additional pupils this development would bring. Furthermore, the lack of secondary or special educational needs (SEN) schools in the village necessitates long, unsustainable journeys for older students.
- **Healthcare Limitations:** GP services in Wolvey are only available on a part-time basis on limited days. Combined with the total absence of a local dentist, chemist, or hospital, residents are forced to travel significant distances for basic healthcare.
- **Poor Essential Services:** Local retail is limited to a small shop unsuitable for weekly needs. Public transport links are also poor, further increasing car dependency for every essential service.
- **Lack of Delivery Plan:** There is no evidence that the proposed development would trigger the necessary improvements to resolve these significant infrastructure gaps.

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.

To make the Local Plan sound and consistent with national sustainability goals, the following modifications are necessary:

- **Remove the proposed housing sites in Wolvey from the draft plan.** The allocation has not been justified, as the available infrastructure is fundamentally incapable of accommodating this level of growth.
- **Redirect development to urban-adjacent areas.** Sites closer to the urban centres of Rugby and Coventry should be prioritised, as these locations offer existing, accessible services and facilities that can more sustainably support new housing

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

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E-mail Address (where relevant)	<input type="text" value="████████████████████"/>	<input type="text"/>

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

Name or Organisation:

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

Paragraph		Policy	EN2	Policies Map	
Site ID	309 & 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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I consider **Policy EN2** to be **unsound** because the proposed allocations do not reflect the available evidence regarding landscape impact, specifically in the following ways:

- **Disregard for Landscape Sensitivity:** Previous evidence has clearly indicated that the land north of the B4109 has a 'High sensitivity to housing development'. Ignoring these findings means the plan is not based on a proportionate or justified evidence base.
- **Impact on Village Character:** The allocation at Land north of B4109 would extend the village footprint substantially towards the River Anker and along the valley slopes. This would fundamentally alter the rural character and setting of Wolvey in a way that is not justified by the evidence.

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

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To make the Local Plan sound and consistent with national policy on protecting the natural environment, the following modification is necessary:

- Remove the land north of B4109 as a proposed allocation from the plan. Given the identified landscape sensitivity and the significant negative impact on the character of the river valley and village setting, this site is unsuitable for development. Removing it would ensure the plan is more closely aligned with its own environmental and landscape protection objectives.

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

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(where relevant)

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?

Paragraph	<input type="text"/>	Policy	<input type="text" value="CL2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="309 & 358"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text" value="Yes"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input type="text" value="No"/>
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I consider **Policy CL2** to be **unsound** as it is currently inconsistent with national policy regarding protected land:

- **Inappropriate Development in the Green Belt:** While the objectives of renewable and low-carbon energy development are positive, these projects constitute inappropriate development within the Green Belt.
- **Lack of Safeguards:** As currently drafted, the policy does not provide sufficient protection to ensure that the "very special circumstances" required for Green Belt development are strictly upheld, potentially leading to the degradation of protected open spaces.

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

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To make the Local Plan sound and compliant with national Green Belt protections, the following modification is necessary:

- **Amend Policy CL2 to prioritise non-Green Belt locations.** The policy wording should be revised to explicitly state that locations for renewable energy development outside of the Green Belt are preferred.
- **Ensure strict alignment with national planning criteria.** This modification would ensure that any low-carbon energy proposals are directed toward more suitable, less sensitive areas first, protecting the integrity of the Green Belt from urban encroachment.

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

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Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="D1 to D5"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="309 & 358"/>				

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I consider the Local Plan **unsound** in relation to the application of **Policies D1 to D5** for the following reasons:

- **Contradiction of Design Objectives:** While I welcome policies that seek to improve design quality, the scale of development proposed for Wolvesey (a 60% increase in the size of the village) is fundamentally at odds with these goals.
- **Impact on Rural Character:** A development of this magnitude would cause significant harm to the local character, rural setting, and established built form of the village. It is impossible to maintain a high standard of design and "sense of place" when the proposed growth is so disproportionate to the existing settlement.

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To make the Local Plan sound and ensure design policies are applied effectively, the following modifications are necessary:

- **Reassess the scale of growth for Wolvey.** The potential impacts of such large-scale growth on the village's unique character should have been fully considered before these sites were proposed as allocations.
- **Reduce or remove the allocations at Site 309 and Site 358.** To align with the design quality goals of Policies D1 to D5, growth must be restricted to a level that respects and enhances the existing built form and rural setting, rather than overwhelming it.

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

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

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="CL1"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="309 & 358"/>				

4. Do you consider the Local Plan:

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

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.

I consider the Climate Change section of the emerging Local Plan and **Policy CL1** to be **unsound** because they are inconsistent with the National Planning Policy Framework (NPPF):

- **Failure to Prioritise Sustainable Transport:** Policy CL1 fails to adequately address the physical location of new developments. To be truly sustainable, new housing must be situated where it can maximise walking and cycling while providing high-quality access to public transport.
- **Inconsistency with National Policy:** By allocating significant growth in remote areas with limited transport links, the plan does not align with NPPF requirements to minimise the need for travel and support a low-carbon future.

(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.

To make the Local Plan sound and consistent with national climate objectives, the following modification is required:

- **Introduce an additional Climate Change policy** specifically regarding the location of growth. This policy should explicitly set out the Council's requirement for locating development in sustainable areas that reduce car dependency.
- **Align development sites with sustainable transport hubs.** This modification would ensure that the Plan practically supports the shift toward walking, cycling, and public transport, rather than locking in high-carbon travel patterns in remote 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.

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:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission 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.

The Rugby Borough Council Privacy Notice for Development Strategy is available here:
<https://www.rugby.gov.uk/w/privacy#development-strategy>
The Planning Inspectorate's privacy notice can be accessed here:
<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>