

Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	Ref: 637 (For official use only)
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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*

2. Agent's Details (if applicable)

**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	<input type="text" value="Mr and Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Steve and Allyson"/>	<input type="text"/>
Last Name	<input type="text" value="Downes"/>	<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"/>
Line 4		<input type="text"/>
Post Code		<input type="text"/>
Telephone Number		<input type="text"/>
E-mail Address (where relevant)		<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	CL1	Policies Map	<input type="text"/>
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		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.

We consider that it is not consistent with the national planning policy framework. Policy C1.1 should also address location of development to ensure that new housing seeks to maximise walking and cycling alongside good access to public transport in accordance with the national planning policy framework.

We consider that this development certainly does not comply with this.

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.

We think that there should be an additional climate change policy setting out the council's aspirations for locating growth in sustainable settings.

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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)

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

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

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

Name or Organisation:

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

Paragraph		Policy	CL2	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	No
(3) complies with the Duty to co-operate	Yes	Yes	No	

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Although mostly sound, Renewable energy and low carbon energy development are inappropriate development in the Green Belt.

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

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

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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	D1 to D5	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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We consider that the Design policies D1 to D5 that set out design improvements to design quality are welcome.

However the huge scale development for Wolvey equating to a 60% sizeable increase will entirely change the character of Wolvey village from a rural community to an expansive over developed area ruining more countryside never to be returned to that definition.

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

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The potential impacts of large-scale growth on the character of Wolvey needed to have been fully considered before sites were proposed as allocations.

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

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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	<input type="text"/>	Policy	<input type="text" value="EN2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="309 & 358"/>				

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(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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We consider that the allocations proposed in the emerging Local Plan do not reflect the available evidence in terms of impacts on the landscape. In particular the site at Land north of B4109. Previous evidence indicated that the site had 'High sensitivity to housing development' in landscape terms. The allocation at Land north of B4109 would extend the village substantially towards the River Anker along the valley slopes. This would have a large impact on the character of the village and the surrounding countryside in particular.

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

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The potential landscape impacts mean that Land north of B4109 should be removed from the plan as a proposed allocation and protected as a village and countryside asset.

(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?

Paragraph	<input type="text"/>	Policy	<input type="text" value="I4"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="309 & 358"/>				

4. Do you consider the Local Plan:

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(2) is Sound	Yes	<input type="text"/>	No	<input type="text" value="No"/>
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We consider that the scale of the development proposed for our rural community in Wolvey, is not capable of being supported by the current infrastructure:

The primary school which we believe is near capacity cannot accommodate another estimated 70 pupils

There is no secondary or special educational need provision for schooling in Wolvey requiring long journeys for residents with resultant impact on the environment in terms of roads and unsustainable public transport

The GP practice has very limited opening requiring long journeys having the same impact as above, this would be exacerbated

The shop is small and not suitable for a weekly shop - requiring long journeys and impact as above

Public transport is extremely limited

There is not dentist, chemist or hospital - requiring long journeys and impact as above.

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The proposed housing sites should be removed from the draft plan because it has not be justified that the available infrastructure can accommodate them. There are better options close to the closer urban areas of Rugby and Coventry that have established and better services and facilities that are easily accessible and sustainable.

(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?

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"/>

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We consider Policy S1 to be unsound in that it is not 'justified' by the supporting evidence. The Rugby Urban Area should accommodate the majority of new growth not the less well-served and remote rural areas.

The 'Main Rural Settlements' definition is not sound - Wolvey is the smallest and least well-served of all the Rural Villages yet has the third highest housing allocation. This will lead to increased Traffic and is not sustainable with detrimental impact on the environment and road network in a small rural community.

This will lead to high car dependency as Wolvey has little public Transport with resultant pressure on the village infrastructure.

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

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We believe Wolvey should be in a lower category in the hierarchy because of its limited services, facilities, employment and public transport.

It is a small remote, rural community unable to accommodate the level of growth proposed.

(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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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"/>

We consider Policy S2 is unsound as it provides the basis for unsustainable pattern of development not 'justified' by the evidence. The policy clearly does not reflect the overall preferred strategy of Urban Concentration – it proposes nearly 58% of new allocations in the rural areas which is over and above those impervious local plans which already have permission..

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

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We think, more growth should be directed to the Urban Areas with their established infrastructure, around Rugby and Coventry with a reduction in Wolvey and other remote rural areas. There are potential alternatives that are more appropriate in terms of their established infrastructure, locations and sustainability

(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="S5"/>	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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The Draft Local Plan seeks to allocate some 1,500 new homes on land that would need to be released from the established Green Belt. This does not 'protect' Green Belt at all and calls in question this definition

There are options outside of the Green Belt that should be explored. The Council's evidence seems contrived and seeks to identify large areas of Green Belt as 'Grey belt' – these areas are needed to safeguard the countryside from encroachment.

This really feels like countryside protection zones are now redundant.

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Allocations and designations should follow the National Planning Policy Framework and only allow changes to the Green Belt in exceptional cases. We do not consider this an exceptional case with established areas on our doorstep with all required infrastructure already in place.

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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"/>
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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.

We believe the Land north of B4109, Wolvey should not be allocated for housing for reasons set out below:

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

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

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Please consider this proposal.
Policy S6 should delete the proposed allocation of 150 homes at 'land north of B4109, Wolvey'. Alternative sites should be considered in strategically preferable locations (such as adjacent to the urban areas of Rugby and/or Coventry) with their established infrastructure.

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

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

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

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

Name or Organisation:

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.

We consider that land north of B4109, Wolvey should not be allocated for housing for reasons set out below:

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

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.

Site 309 should be deleted as a proposed allocation of 150 homes at 'land north of B4109, Wolvey'.

Alternative sites should be considered in strategically preferable locations (such as adjacent to the urban areas of Rugby and/or Coventry) with their established infrastructure.

(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.