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

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

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	CL1 – Net Zero Buildings	Policies Map	WOLVEY
Site ID	309				

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.
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.

Not justified or consistent with National Policy

The proposed Local Plan deals with "Net Zero Buildings".

The Buildings cannot be considered in isolation as if they are built in the least sustainable and most remote part of the Borough, this rather defeats the object of having a Net Zero building. This is down to woefully inadequate transport links which will require use of private vehicles to travel to and from the village, thus increasing carbon emissions.

Paragraph 110 of the NPPF states:
"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes".

Net Zero houses are only positive for the environment if there are sustainable transport options available to travel to and from them.

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

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Site 309 should be removed from the Local Plan, due to the lack of sustainability and increase in carbon emissions.

There should be an additional Climate Change Policy that sets out the Council's aspirations for locating growth in sustainable locations.

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

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

Name or Organisation:

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

Local Plan Paragraph	CL3	Local Plan Policy	CL3 - Water Supply, Quality & Efficiency	Policies Map	WOLVEY
Site ID	309				

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	

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Not justified or consistent with National Policy

Sufficient Water supply cannot possibly be guaranteed to a development as significant as 150 further houses in Wolvey village when such guarantees cannot be provided by Severn Trent, the area's Water supplier. This was acknowledged by the Rugby Borough Council representative at the Local Plan Meeting in Wolvey Village Hall on 10th February 2026. It was admitted that there was "ongoing discussion" with Severn Trent in relation to Water provision and waste water and drainage management.

If there is no guarantee from Severn Trent that they can service a further 150 houses then this proposal is NOT sound.

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.

Making the local plan sound would remove Site 309, as relevant service providers (Ie Severn Trent) cannot guarantee service provision required.

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

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Organisation (where relevant)		
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Line 4		
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E-mail Address (where relevant)	[redacted]	

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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	CL4 – Climate Adaptation	Policies Map	WOLVEY
Site ID	309				

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	

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Not justified or consistent with National Policy

The proposed Local Plan at Policy CL4 states:

A. All development shall be resilient to, and adapt to the future impacts of, climate change. To achieve this:

iii. vulnerability of the development to flood risk shall be minimised

Site 309 was previously declared as having a "high sensitivity to housing development" as it was classed as being on a flood plain, as recently as 2016 I believe. If one walks at the perimeter of Site 309 which is at the lowest aspect near to Makins fisheries and then near to the River Anker, the ground is exceedingly wet all year round, but after periods of extended rainfall it becomes a quagmire. It you are to walk around from the B4109 towards the Hall Lane end of the proposed site further towards the River Anker, the ground is bog/marshland-like all year round and this becomes almost impassible during wet late Autumn and early Spring months, and in all honesty not a great deal drier during the summer.

Let us consider the recent new housing development at Kingmakers View. From knowing residents who have lived in the village for over 40 years, they can report no previous flooding of note to Wolvey Village Centre. Since the development at Kingmakers View, however, a number of homes have had water build-up and

flooding within the properties on the new estate. Add to this the very significant flood at the bottom of Temple Hill, Wolvey just down the incline from the Kingmakers View Estate, and we immediately see flooding of a level not previously seen.

One now needs to consider Site 309 (historically very much wetland to the far extreme of the prescribed site perimeters) The outer most perimeters are Makins fishing lakes to the west and the river Anker to the North. Site 309, which I have already highlighted is at risk from ongoing drainage and sewage leakage issues. Add the 2 together and you inevitably have the potential of pollution into both the fishing lakes and river. Planning permission at site 309 was rejected in 2016 for the very reason that it was on the flood plain.

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

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Not justified and not consistent with National Policy

Site 309 should be removed from the plan as flood risk are too substantial as demonstrated by the knock on effects of development at Kingmaker's View, Wolvey.

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

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First Name	Sarah Elizabeth	
Last Name	GILLMAN	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[redacted]	
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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	EN1 – Biodiversity & Geodiversity	Policies Map	WOLVEY
Site ID	309				

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	

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Not justified or consistent with National Policy

The proposed submission of the local plan at **EN1 C** states:

"Development likely to result in harm to or the loss of a Local Wildlife Site, Local Nature Reserve or Local Geological Site will not be permitted unless:

it can be demonstrated that the development could not reasonably be located on an alternative site that would cause less harm;"

The NPPF states at Paragraph 192:

"… plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks …".

Wolvey Wetlands Trust have flagged up Site 309 as being a significant Wetland, which besides from being totally unsuitable for housing development, it is an area which sustains crucial local wildlife. Their representative at one of the Wolvey Parish Council

Planning meetings stated that building on this area would amount to "ecological criminal damage" due to the make-up of the land on Site 309.

A proportionate ecological assessment should have been undertaken.

Due to this Wolvey Parish Council have suggested themselves an alterative Site to Site 309 which is virtually opposite Site 358 on the other side of Coventry Road.

It takes development away from the wetland area of Site 30, and at Rugby Borough Council's information Evening in February 2026 one of their representatives, Neil, I forget the surname, stated that when looking at Site 309 and the previously intended Site opposite Site 358, he said "There really wasn't much difference between the 2". If that is the case surely building on Site 309, a recognised wetland area adjacent to an existing wildlife site should be dismissed, or moved, as Wolvey Parish Council suggest to the new Site opposite 358.

(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.

Potential ecological impacts mean that Land North of B4109 (Site 309) should be removed from the plan as a proposed allocation.

(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	EN2 – Landscape Protection	Policies Map	WOLVEY
Site ID	309				

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	

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Not justified or consistent with National Policy

The new proposed local plan submission states at EN2:

A. Development shall **avoid significant adverse impacts on landscape character and significant adverse visual impacts**.

B. Development proposals must be **located and designed to respect scenic quality and maintain a distinctive sense of place.**

NPPF Paragraph 187:
"Planning policies and decisions should contribute to and enhance the natural and local environment …".

Wolvey Parish Council have considered this Policy and reflected on previous proposed development at Site 309. The allocation proposed for Site 309 do not reflect the available evidence in terms of impacts on the landscape. Previous evidence for Site 309 indicated that the site had **"High sensitivity to housing development"** in landscape terms.

The allocation at Site 309 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, especially when approaching along the B4109 from Bulkington.

So if we now consider development purely from the perspective of: "**avoid significant adverse impacts on landscape character and significant adverse visual impacts"**

One can see in the above map that there are essentially 3 main ingress/egress routes for Wolvey Village.
1.The road leading out of Wolvey which splits into Temple Hill and Leicester Road. One can see the Kingmakers View Housing Development outlined in blue on this route.
2. Bulkington Road (B4109) leading to Bulkington and going past proposed Site 309.
3. Coventry Road leading to Coventry and going past proposed Site 358.

Why on earth are RBC considering the Site 309 development when this would then mean that all 3 routes in and out of Wolvey Village would be adversely affected (both landscape character and visual impacts) by new housing developments. On the basis that Site 358 is in the proposed local plan submission, why not consider the new Site on the opposite side of the road (which WPC are putting forward and indeed remains part of the larger original proposed site which also encompassed Site 358.) Better to have development in essentially the same area, than at 2 totally separate sides to the village.

This way at least the Bulkington Road entrance/exit to the village will remain protected and will **avoid significant adverse impacts on landscape character and significant adverse visual impacts"** – which is in RBC's own proposed local plan.

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The potential landscape impacts mean that Site 309 should be removed from the Local Plan.

If Site 309 is not removed then it is absolutely **IMPERATIVE** that at least one entrance/exit to the Village is protected from "**significant adverse impacts on landscape character and significant adverse visual impacts",** by changing Site 309 to the new proposed Wolvey Parish Council Site opposite Site 358.

(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	EN7 – Flood Risk	Policies Map	WOLVEY
Site ID	309				

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	

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Flood Defences

B. Where development is permitted in areas at risk of flooding it will need, in accordance with national policy and guidance, to be safe for its lifetime without increasing flood risk elsewhere and, where possible, reduce flood risk overall.

C. The functional floodplain, other areas needed for current or future flood risk management, and areas within 8 metres from the edge of a watercourse or Main River will be safeguarded from built development.

Site 309 was previously declared as having a "high sensitivity to housing development" as it was classed as being on a flood plain, as recently as 2016 I believe. If one walks at the perimeter of Site 309 which is at the lowest aspect near to Makins fisheries and then near to the River Anker, the ground is exceedingly wet all year round, but after periods of extended rainfall it becomes a quagmire. It you are to walk around from the B4109 towards the Hall Lane end of the proposed site further towards the River Anker, the ground is bog/marchland-like all year round and this becomes almost impassible during wet late Autumn and early Spring months, and in all honesty not a great deal drier during the summer.

Let us consider the recent new housing development at Kingmakers View. From knowing residents who have lived in the village for over 40 years, they can report no previous flooding of note to Wolvey Village Centre. Since the development at

Kingmakers View, however, a number of homes have had water build-up and flooding within the properties on the new estate. Add to this the very significant flood at the bottom of Temple Hill, Wolvey just down the incline from the Kingmakers Estate, and we immediately see flooding of a level not previously seen.

One now needs to consider Site 309 (historically very much wetland to the far extreme of the prescribed site perimeters) The outer most perimeters are Makins fishing lakes to the west and the river Anker to the North. Site 309, which I have already highlighted is at risk from ongoing drainage and sewage leakage issues. Add the 2 together and you inevitably have the potential of pollution into both the fishing lakes and river. Planning permission at site 309 was rejected in 2016 for the very reason that it was on the flood plain.

(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.

Simply not viable or SOUND with development on the flood plain/marsh area of Site 309.

(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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NA

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

Part A

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

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

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	EN8 – Environmental Protection & Amenity	Policies Map	WOLVEY
Site ID	309				

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.
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.

Not justified or consistent with national policy

A. Development shall not cause or be affected by unacceptable harm to human health, living conditions or the natural environment through air (including odour), **water**, noise, or light pollution, vibration, insects, vermin**, land contamination or instability**.

Severn Trent Water cannot make any guarantees that a further 150 dwellings on Site 309 could be successfully serviced.

Their Drainage & Waste Water Management Plan (DWMP23) provides a development strategy for the period of 2025-2030. Nowhere in that plan does it feature an upgrade/expansion to the Bramcote mains sewer/waste system that serves Wolvey (as part of the Trent Confluence operating area).

Bear in mind their current plan only runs to 2030 and the next 5 year plan (DWMP28) that will cover 2030-2035 has not even been formulated yet.

I can provide specific evidence of just how inadequate and "not fit for purpose" the drainage and waste water system in Wolvey is currently:

My current home address is [redacted], where I live with my husband. We have lived at this address since June 2007, and throughout that time we have

experienced continuing problems with the drainage of our waste water and sewage. In the 18 years that we have lived at this address we have had to have Severn Trent Water come out to address major problems with the mains sewage drain serving our house. Our house is a semi-detached and is at the end of the mains sewage line. Access to the main drainage system is access by a manhole cover in our back garden. Each time we have had engineers out to our property it has taken a minimum of 2 visits per issue, the most recent of which being as recent as March 2025. Each time engineers have come out they have concluded that the **antiquated drainage system which serves this part of Wolvey (the end of Bulkington Road B4109 leading out of the village towards Bulkington) simply cannot handle the volume of waste coming through it.** The engineers have literally told us that the drainage system **IS NOT FIT FOR PURPOSE**.

One of the drain overflows from the Severn Trent main in the past was literally raw sewage which seeped from our garden and over the lawns of 3 adjoining rear gardens. Severn Trent confirmed, this was not as a result of anything we had done from our private side of the drains, but was **their main system and a major problem with a total lack of flow.** The last repair in March 2025 involved a deep clean of the drainage line by using the manhole access on our property and then using specialist equipment in order to insert a silicon liner, which required inflating in order to effectively insert it around 23 metres along the length of the mains drain. We were told this was a new technique and should solve all problems in the future and we would find we should not need to ring for an Engineer in the future due to a blocked drain. They also reset a drainage level monitor that would send an emergency alarm straight to Severn Trent Engineering HQ should the drainage reach a worryingly high level.

It is with equal levels of interest and concern that I note that the conclusion in the SA document of the RBLP in regards to WATER is basically inconclusive. It merely states that ongoing consultation with Severn Trent is crucial.

I now consider the proposed development at Site 309 - To the West and North of the A4109 which will be directly to the front but also crucially of a lower elevation than the current houses at that location. (Ie the front line houses 21 to 28 and also those along Bulkington Road reaching up towards opposite the primary school). I cannot see how one can consider that effective drainage can be provided, when the current mains sewage system is consistently struggling to cope and causing overflow of sewage, especially when one considers its close proximity to the Village school.

In addition to this also of a lower elevation to the current building line is the River Anker and the Makins fisheries estate. If our drains are causing a persistent problem, what on earth could be the environmental impact of a drainage back-up caused by the addition of 150 houses at Site 309? Any encroachment of raw sewage into natural water courses such as the river or fishing lakes could cause untold damage.

During the last 18 years and even very recently there are frequently (Once every 2-3 months) Drainage Remedy van (and often actual Severn Trent vans) attending addresses along the length of [redacted] carrying out remedial work at properties, and this has all been sewage run blockages.

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

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150 dwellings at Site 309 is simply non-viable and **UNSOUND** with regard to Severn Trent sewage and waste water provision

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

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Part A

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

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

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	I1 - Transport	Policies Map	WOLVEY
Site ID	309				

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.
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.

Not justified or consistent with National Policy.

Please consider the following paragraphs in the Policy I1 – Transport of the Local Plan Proposed Submission Version January 2026:

9.1 The objective of this policy is to promote active travel (including wheeling and horse riding) and **public transport use**, while **ensuring safe access and mitigating adverse impacts on the highway network**. **Facilitating alternatives and managing the growth of vehicular traffic resulting from development is important, because of its adverse impacts on air quality, noise, vibration, road safety, greenhouse gas emissions and traffic congestion.**

9.2 Wherever possible, development must include realistic, **safe and convenient alternatives to the private motor vehicle, particularly for local journeys.**

Please consider the above paragraphs in view of the recommendations of the National Planning Policy Framework:

Paragraph 109: "Transport issues should be considered from the earliest stages of plan-making and development proposals … ".

Paragraph 110: "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes"…..

...see next page

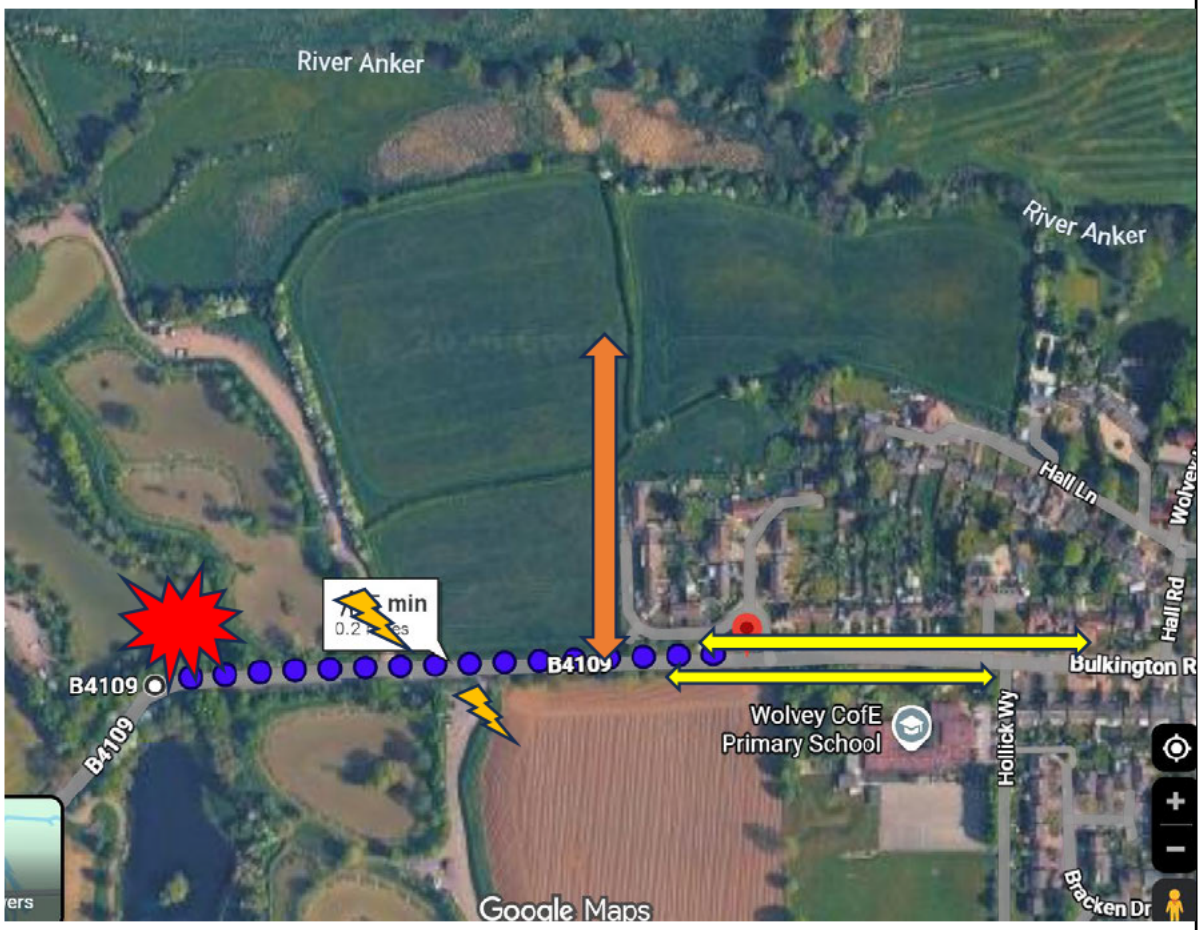
The evidence

SAFE ACCESS & ROUTES
Specifically for Site 309
Policy I1 "....ensuring safe access and mitigating adverse impacts on the highway network"

NPPF Paragraph 117 ""... development should ... create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles"

The proposal for 150 homes at Site 309 would clearly require a main access road. If one studies the map of the proposed site there appears to be only one feasible access route, and that is from the B4109, which is the sole road which connects Wolvey to Bulkington.

If one considers the point at which that access could be there are few, and one could argue **NO** safe access points. Please see the map below:



The yellow arrows represent vastly congested parking from vehicles dropping children to school at the start and end of the school day. This includes persistent illegal parking on "Zig Zags" that has been reported to the School and Warwickshire Police a huge amount of times over the years with no improvement.

Any traffic entering or exiting the new proposed Site 309 would have only 2 options for onward travel. Back through the village for any direct travel towards Rugby, Coventry, M6, M1 or other destinations in that direction. Alternatively towards Bulkington passing the main entrance to Makins Fisheries (a popular rural recreation location) and on towards Bulkington, Bramcote Barracks and/ or Whitestone, Nuneaton. (90% of these journeys would have to be by private vehicle – increasing carbon emissions)

The 2 pale amber lightening signs represent the 2 entrances to Makins Fishing lakes, which are a well used recreation facility and those entrances are relatively hazardous turns given the close proximity of a very close blind bend.

The bright red Explosion on the map is the blind bend on the corner at the bottom of the hill - there is a sharp bend which can be extremely hazardous. As a local resident who often uses the route between Wolvey and Bulkington I can report that at least 3 times annually the crash barriers preventing vehicles from ending up in the ditch have been destroyed by road traffic collisions.

With all these above factors taken into consideration that leaves us with the long dark amber arrow, which one would have to deduce would be the only viable access road into site 309.

Taking into account the aforementioned hazards, I would have to strongly contest this is simply a totally unsound access location to Site 309. There is simply not enough distance between the other highway hazards pointed out for this to be viable or sound. And therein lies the test to the soundness of Site 309. By RBC's own proposal vehicular access will be solely from the B4109:

"Development requirements: • Vehicular access from the B4109. Pedestrian and cycle access to Hall Lane."

I have already demonstrated the total unsuitability of vehicular access from the B4109. If the only other proposed access is pedestrian or cycle from Hall Lane, then there exists 2 major problems:

1. The development of Site 309 is simply totally unsound.
2. Any development of Site 309 (being 150 homes) there is a recommendation that there must be consideration for an "emergency access only" for emergency service vehicles. This is not even given consideration in the New Proposed Local Plan. Let us also bear in mind Rugby Borough Council have now recommended that Site 309 could ultimately provide 190 homes (40 above the proposed number now).

I am aware Wolvey Parish Council have submitted an alternative site of a similar size which is almost directly opposite Site 358. Whilst I also suggest this is an excessive amount of development, I propose this would have none of the highway safety concerns I have pointed out earlier in this section.

TRANSPORT LINKS
Paragraph 109: "Transport issues should be considered from the earliest stages of plan-making and development proposals … ".

A completely unsustainable lack of public transport. The bus services that do currently run through Wolvey are operated by service providers from outside the Rugby Borough Council jurisdiction - ie the Stagecoach 74 (& 74A, B, & C) bus service runs between Nuneaton (Nuneaton & Bedworth Council) & Coventry (Coventry City Council) and just

happens to stop in Wolvey. The service provides only 6 buses per day each way, none of which service the morning rush hour which one could speculate would be imperative for new Wolvey residents travelling to work. Furthermore, I do not really see any remit that Rugby Borough Council would have to influence the addition of further services from Stagecoach.

The frequency of the only other bus services is abismal: and specifically cater for people requiring accessible transport (Ie what was formerly known as the "Ring and Ride" service). Each of these provide 1 return service daily and in most instances only on one day per week.

These are 4 services offered by National Express
210, 213, 220 and 241 bus services are operated by National Express and specifically cater for people requiring accessible transport (Ie what was formerly known as the "Ring and Ride" service). Each of these provide 1 return service daily and in most instances only on one day per week.
The only 3 services connecting Wolvey to the Borough town of Rugby are indeed "accessible transport" services and most of the time one has to ring to request a vehicle.

THERE IS NO REGULAR BUS SERVICE BETWEEN WOLVEY AND RUGBY.

That is the sum total of public transport in and out of Wolvey village, which, if I'm honest is woefully inadequate for the current village population, let alone any expansion. In an era of making efforts to reduce the carbon footprint and reduce effects on the environment, agreeing to such a high number of houses (150) in what is by the Council's own admission – Wolvey the most isolated and least sustainable village in the Borough - is simply unacceptable and cannot in any way be viewed as "sound".

Proposed new homes are remote from urban areas with shops, jobs, leisure and medical facilities.

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

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Remove Site 309 from the new proposed local plan. No safe access road can be provided for Site 309 – this Site is simply unfeasible due to inadequate distance between School entrance, other access roads to popular recreation facilities and a blind bend which has seen regular serious accidents annually.

Total inadequate transport provision to and from Wolvey.

Large housing site expansion should be removed from the Local Plan because there are better options situated closer to the Urban areas of Rugby and Coventry that should be considered first. This will make Policy I1 more consistent with the NPPF.

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

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Part A

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

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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	I4 – Infrastructure & Planning Obligations	Policies Map	WOLVEY
Site ID	309				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	*	No	
(2) is Sound	Yes		No	*
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Not justified or consistent with National Policy.

Please consider the following paragraphs in the Policy I4 – Infrastructure & Planning Obligations of the Local Plan Proposed Submission Version January 2026:

Policy I4 paragraph 9.10
"It is essential that **adequate infrastructure capacity** exists to accommodate new development. The policy provides a basis for requiring the delivery of necessary infrastructure upgrades to meet the additional demand generated by new development. Such infrastructure may include (amongst other things) **school places, transport, water supply/wastewater, flood defences, health facilities,** public open spaces and community facilities."

Please consider the above paragraph in view of the recommendations of the National Planning Policy Framework:

Paragraph 77 "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, **provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)".**

So taking each element of Infrastructure individually, one can see that adequate infrastructure capacity does not currently exist in Wolvey:

School Places

Paragraph 100 of the NPPF **"It is important that a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities".**

The Evidence
Wolvey C of E Primary School, Bulkington Road, Wolvey, Hinckley, LE10 3LA. Wolvey primary school does come under the jurisdiction of RBC and WCC, however the secondary school that Wolvey Primary feeds into is outside of RBC's jurisdiction - Ie Nicholas Chamberlaine, Bulkington Rd, Bedworth CV12 9EA. (Nuneaton & Bedworth Council) Should there be any future issues with capacity at Nicholas Chamberlaine, this will cause major issues with the current village population, let alone with pupils from a potential further 150 houses (added to the further proposed 60 homes at Site 358).

Taking into account a continuing cycle of housing development proposals within Nuneaton and Bedworth Council area, Secondary School age school children from Wolvey may be denied entry to Nicholas Chamberlaine, and if this were the case pupils would need to be transported (presumably by bus) to other options within the RBC area. Again one questions the environmental/emissions impact of such a scenario.

With a current waiting list for admission into Wolvey C of E Primary reception of around 12 pupils, numerous families are already sending their children to Brinklow Primary school at The Revel in Monks Kirby, which is a round trip of around 12 miles only achievable by private vehicle. Consider the environmental impact of this already with regard to emissions, before one even considers further dwellings in Wolvey village.

The Government's Dept for Education statistics that were current up to September 2025 offers national pupil yields from housing development. This states that 100 new homes will typically include 25 primary school pupils, so if Site 309 is considered this would be 37.5 additional pupils that would need Primary education, far exceeding what is or could be feasible at Wolvey C of E Primary.

If you add Site 358 into the equation (60 new homes) that would equate to over new 50 primary places required.

Simply not a sound option.

Transport (inc "ensuring safe access and mitigating adverse impacts on the highway network " (Taken from policy I1) **Matched with I1 – Transport**.

The evidence

NPPF Paragraph 117 ""… development should … create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles"

The proposal for 150 homes at Site 309 would clearly require a main access road. If one studies the map of the proposed site there appears to be only one feasible access route, and that is from the B4109, which is the sole road which connects Wolvey to Bulkington.

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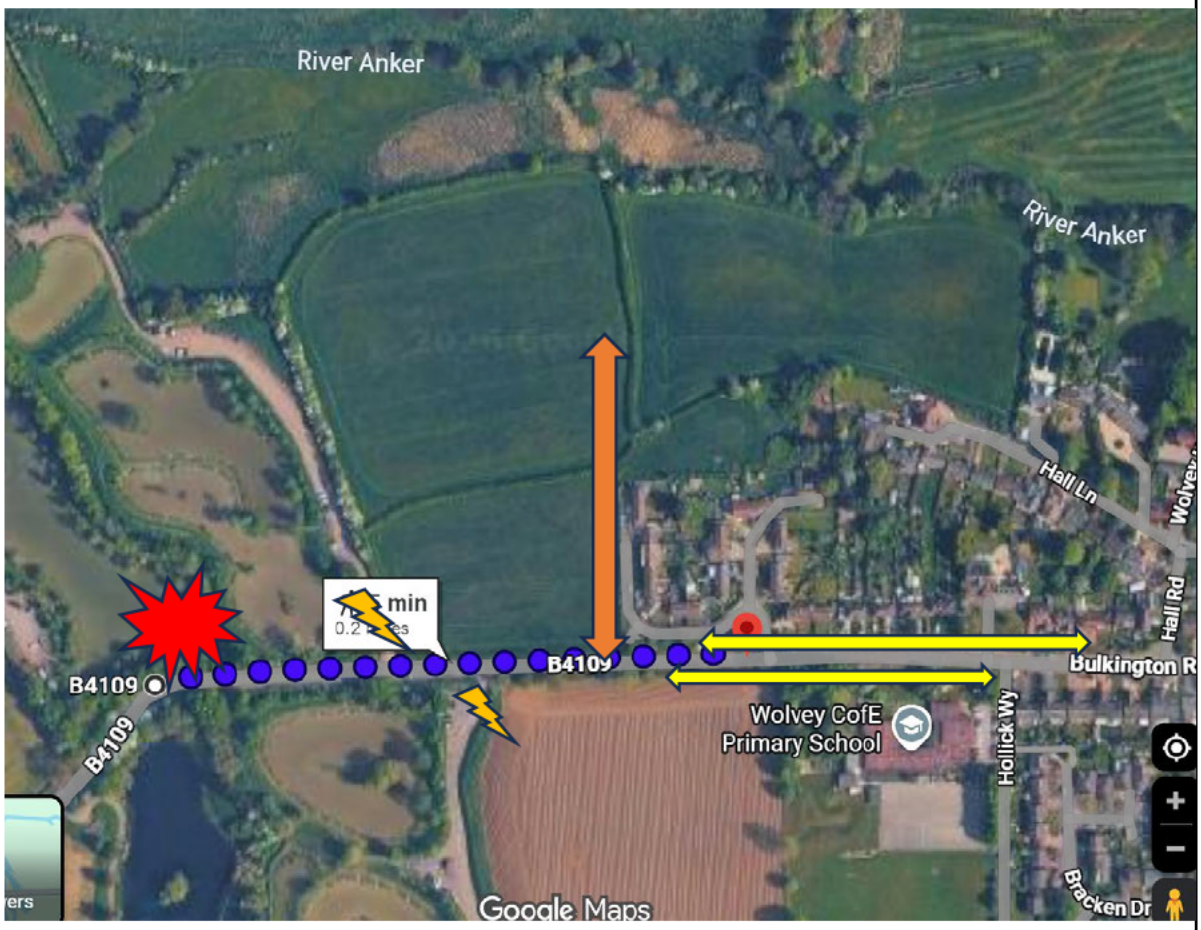

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Taking into account the aforementioned hazards, I would have to strongly contest this is simply a totally unsound access location to Site 309. There is simply not enough distance between the other highway hazards pointed out for this to be viable or sound. And therein lies the test to the soundness of Site 309. By RBC's own proposal vehicular access will be solely from the B4109:

"Development requirements: • Vehicular access from the B4109. Pedestrian and cycle access to Hall Lane."

I have already demonstrated the total unsuitability of vehicular access from the B4109. If the only other proposed access is pedestrian or cycle from Hall Lane, then there exists 2 major problems:

1. The development of Site 309 is simply totally unsound.
2. Any development of Site 309 (being 150 homes) there is a recommendation that there must be consideration for an "emergency access only" for emergency service vehicles. This is not even given consideration in the New Proposed Local Plan. Let us also bear in mind Rugby Borough Council have now recommended that Site 309 could ultimately provide 190 homes (40 above the proposed number now).

I am aware Wolvey Parish Council have submitted an alternative smaller site which is almost directly opposite Site 358. Whilst I also suggest this is an excessive amount of development, I propose this would have none of the safety highway concerns I have pointed out earlier in this section.

TRANSPORT LINKS
Paragraph 109: "Transport issues should be considered from the earliest stages of plan-making and development proposals … ".

A completely unsustainable lack of public transport. The bus services that do currently run through Wolvey are operated by service providers from outside the Rugby Borough Council jurisdiction - ie the Stagecoach 74 (& 74A, B, & C) bus service runs between Nuneaton (Nuneaton & Bedworth Council) & Coventry (Coventry City Council) and just happens to stop in Wolvey. The service provides only 6 buses per day each way, none of which service the morning rush hour which one could speculate would be imperative for new Wolvey residents travelling to work. Furthermore, I do not really see any remit that Rugby Borough Council would have to influence the addition of further services from Stagecoach.

The frequency of the only other bus services is abysmal: and specifically cater for people requiring accessible transport (Ie what was formerly known as the "Ring and Ride" service). Each of these provide 1 return service daily and in most instances only on one day per week.

These are 4 services offered by National Express
210, 213, 220 and 241 bus services are operated by National Express and specifically cater for people requiring accessible transport (Ie what was formerly known as the "Ring and Ride" service). Each of these provide 1 return service daily and in most instances only on one day per week.
The only 3 services connecting Wolvey to the Borough town of Rugby are indeed "accessible transport" services and most of the time one has to ring to request a vehicle.

THERE IS NO REGULAR BUS SERVICE BETWEEN WOLVEY AND RUGBY.

That is the sum total of public transport in and out of Wolvey village, which, if I'm honest is woefully inadequate for the current village population, let alone any expansion. In an era of making efforts to reduce the carbon footprint and reduce effects on the environment, agreeing to such a high number of houses (150) in what is by the Council's own admission – Wolvey the most isolated and least sustainable village in the Borough - is simply unacceptable and cannot in any way be viewed as "sound".

Proposed new homes are remote from urban areas with shops, jobs, leisure and medical facilities.

Water supply/Waste Water

Matched with Policy EN 8 Environmental Protection & Amenity

Severn Trent Water cannot make any guarantees that a further 150 dwellings on Site 309 could be successfully serviced.

Their **Drainage & Waste Water Management Plan (DWMP23)** provides a development strategy for the period of 2025-2030. Nowhere in that plan does it feature an upgrade/expansion to the **Bramcote mains** sewer/waste system that serves Wolvey (as part of the **Trent Confluence** operating area).

Bear in mind their current plan only runs to 2030 and the next 5 year plan (DWMP28) that will cover 2030-2035 has not even been formulated yet.

I can provide specific evidence of just how inadequate and "not fit for purpose" the drainage and waste water system in Wolvey is currently:

My current home address is 27 Bulkington Road, where I live with my husband. We have lived at this address since June 2007, and throughout that time we have experienced continuing problems with the drainage of our waste water and sewage. In the 18 years that we have lived at this address we have had to have Severn Trent Water come out to address major problems with the mains sewage drain serving our house. Our house is a semi-detached and is at the end of the mains sewage line. Access to the main drainage system is access by a manhole cover in our back garden. Each time we have had engineers out to our property it has taken a minimum of 2 visits per issue, the most recent of which being as recent as March 2025. Each time engineers have come out they have concluded that the **antiquated drainage system which serves this part of Wolvey (the end of Bulkington Road B4109 leading out of the village towards Bulkington) simply cannot handle the volume of waste coming through it.** The engineers have literally told us that the drainage system **IS NOT FIT FOR PURPOSE**.

One of the drain overflows from the Severn Trent main in the past was literally raw sewage which seeped from our garden and over the lawns of 3 adjoining rear gardens. Severn Trent confirmed, this was not as a result of anything we had done from our private side of the drains, but was **their main system and a major problem with a total lack of flow.** The last repair in March 2025 involved a deep clean of the drainage line by using the manhole access on our property and then using specialist equipment in order to insert a silicon liner, which required inflating in order to effectively insert it around 23 metres along the length of the mains drain. We were

told this was a new technique and should solve all problems in the future and we would find we should not need to ring for an Engineer in the future due to a blocked drain. They also reset a drainage level monitor that would send an emergency alarm straight to Severn Trent Engineering HQ should the drainage reach a worryingly high level.

It is with equal levels of interest and concern that I note that the conclusion in the SA document of the RBLP in regards to WATER is basically inconclusive. It merely states that ongoing consultation with Severn Trent is crucial.

I now consider the proposed development at Site 309 - To the West and North of the A4109 which will be directly to the front but also crucially of a lower elevation than the current houses at that location. (Ie the front line [redacted] and also those along [redacted] reaching up towards opposite the primary school). I cannot see how one can consider that effective drainage can be provided, when the current mains sewage system is consistently struggling to cope and causing overflow of sewage, especially when one considers its close proximity to the Village school.

In addition to this also of a lower elevation to the current building line is the River Anker and the Makins fisheries estate. If our drains are causing a persistent problem, what on earth could be the environmental impact of a drainage back-up caused by the addition of 150 houses at Site 309? Any encroachment of raw sewage into natural water courses such as the river or fishing lakes could cause untold damage.

During the last 19 years and even very recently there are frequently Drainage Remedy van (and often actual Severn Trent vans) attending addresses along the length of Bulkington Road carrying out remedial work at properties, and this has all been sewage run blockages.

Flood Defences

Matched with Policy EN 7 Flood Risk

B. Where development is permitted in areas at risk of flooding it will need, in accordance with national policy and guidance, to be safe for its lifetime without increasing flood risk elsewhere and, where possible, reduce flood risk overall.

C. The functional floodplain, other areas needed for current or future flood risk management, and areas within 8 metres from the edge of a watercourse or Main River will be safeguarded from built development.

Site 309 was previously declared as having a ”high sensitivity to housing development” as it was classed as being on a flood plain. If one walks at the perimeter of Site 309 which is at the lowest aspect near to Makins fisheries and then near to the River Anker, the ground is exceedingly wet all year round, but after periods of extended rainfall it becomes a quagmire. It you are to walk around from the B4109 towards the Hall Lane end of the proposed site further towards the River Anker, the ground is bog/marchland-like all year round and this becomes almost impassible during wet late Autumn and early Spring months.

Let us consider the recent new housing development at Kingmakers View. From knowing residents who have lived in the village for over 40 years, they can report no previous flooding of note to Wolvey Village Centre. Since the development at Kingmakers View, however, a number of homes have had water build-up and flooding within the properties on the new estate. Add to this the very significant flood at the

bottom of Temple Hill, Wolvey just down the incline from the Kingmakers Estate, and we immediately see flooding of a level not previously seen.

One now needs to consider Site 309 (historically very much wetland to the far extreme of the prescribed site perimeters) The outer most perimeters are Makins fishing lakes to the west and the river Anker to the North. Site 309, which I have already highlighted is at risk from ongoing drainage and sewage leakage issues. Add the 2 together and you inevitably have the potential of pollution into both the fishing lakes and river. Planning permission at site 309 was rejected in 2016 for the very reason that it was on the flood plain.

Health Facilities

This quite straightforward**:**
Doctor's surgeries
Wolvey has 1 Doctors surgery which is in fact a satellite surgery of Burbage Surgery, Tilton Rd, Burbage, Hinckley, Leicestershire LE10 2SE. This means the sole medical provision for the village is based in Leicestershire, and, if at any given time the surgery in Wolvey is withdrawn by the "parent" Burbage Surgery, Rugby Borough Council have no jurisdiction over this. Wolvey surgery cannot cope with the demand from the current village population, with residents unable to get appointments for weeks as it stands. The surgery is only open half a day during the week.

There are no other health facilities in the village, and with the abysmal lack of public transport, no easy access to further medical facilities for anyone without their own vehicles access to Health facilities is non-existent for a larger community.

Should Burbage Surgery decide to withdraw Wolvey Surgery, there will be NO medical provision in the village.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Site 309 should be removed from the proposed Local Plan as the Infrastructure of Wolvey cannot cope with the large number of proposed homes and is therefore **UNSOUND**.

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

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*
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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

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

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

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	S1 – Settlement Hierarchy	Policies Map	WOLVEY
Site ID	309				

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.
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.

Not justified or consistent with National Policy

The proposed Local Plan submission at SL1 1.15 states:

1.15 "The settlement hierarchy seeks to direct development to those locations with services and facilities."

The NPPF at Paragraph 198 states:

" … Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development".

Firstly by Rugby Borough Council's own admission in their Sustainability Appraisal, Wolvey is the most remote Rural Settlement in the Borough and has been classified as having the lowest sustainability rating. Directing Settlement Hierarchy to Wolvey is **NOT SOUND** as it is not a "Location with services and facilities" that are sufficient to serve a further total of 210 homes (150 in Site 309). This includes insufficient school places, small GP Surgery (which in itself is only a satellite of the main surgery based in Hinckley and Bosworth Borough Council, outside of the jurisdiction of RBC). Woeful transport links and inadequate highways for the increased flow of traffic.

This would (As per the NPPF P.198) render Wolvey to be in the main "**inappropriate for new development"**…..due to the **"sensitivity of the site or the wider area to impacts that could arise from the development."**

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Wolvey should be in a lower category in the hierarchy because of its limited services, facilities, employment opportunities and lack of any reliable and regular public transport.

It is a small remote village unable to accommodate the level of growth proposed.

Suggest remove Site 309 from the Local plan, whilst possibly able to sustain Site 358.

(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 A

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

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

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	S5 – Countryside Protection	Policies Map	WOLVEY
Site ID	309				

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.
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.

Not justified or consistent with National Policy

A. Outside of the settlement boundaries shown on the policies map, new development will only be permitted where it is in accordance with a policy of this plan which supports development in such locations.

The NNPF at Paragraph 145 states:
"… Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans".

The proposed Local Plan seeks to allocate some 1500 new homes on land that would need to be released from the established Green Belt. There are development options outside the greenbelt that should be explored.

The Council's evidence is contrived and seeks to identify large areas of Green Belt as "Grey Belt" – these areas are need to safeguard the countryside from encroachment.

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

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Allocations and designations should follow the National Planning Policy Framework and only allow changes to the Greenbelt in exceptional circumstances – therefore Site 309 should be removed from the Local Plan.

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

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