

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="Ms"/>	<input type="text"/>
First Name	<input type="text" value="Susan"/>	<input type="text"/>
Last Name	<input type="text" value="Isaac"/>	<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"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text" value="██████████"/>	<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: Ms Susan Isaac

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="Site 309"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy S1 (Settlement Hierarchy) is considered **unsound as it is not justified**, for the following reasons:

- The evidence base does not adequately support Wolvey's position within the settlement hierarchy.
- New development should primarily be focused within the **Rugby Urban Area**, rather than in smaller, less accessible rural locations.
- The classification of '**Main Rural Settlements**' is inconsistent. Wolvey is the smallest and least well-served of the rural villages, yet it is allocated the third-largest level of housing growth.
- The village has limited access to services, facilities, employment opportunities and public transport.

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

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

- Wolvey should be placed in a lower tier of the settlement hierarchy, with no major developments allocated, due to its limited services, facilities, employment opportunities and public transport.
- As a small and remote village, Wolvey is not well suited to accommodate the level of growth currently proposed.

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

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

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

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

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

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

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

Name or Organisation: Ms Susan Isaac

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

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	Site 309				

4. Do you consider the Local Plan:

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(3) complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The proposals for **Site 309, land north of B4109, Wolvey**, fail the **Soundness Test** as they are **not justified** and **inconsistent with national policy** for the following reasons:

- **150 homes** represent a disproportionate increase for the size of the village.
- The site lies within the **Green Belt**, contrary to Government policy.
- Previous landscape assessments identify the land as having **high sensitivity to housing development**, making it unsuitable.
- Part of the site borders a **Local Wildlife Site**, and the ecological impacts have not been properly assessed.
- The proposed development (150–210 homes) would place **unsustainable pressure on local infrastructure**, including the primary school, secondary school travel, GP practice, and limited public transport.
- The Council's **Sustainability Appraisal** notes that Wolvey is a **small rural settlement with a low settlement score**.

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

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

The Local Plan should be revised as follows:

- **Land north of B4109 (Site 309) should be removed from the proposed allocations.**
- **Alternative sites** closer to the **urban areas of Rugby and Coventry** should be prioritised, offering **superior access to services, facilities, employment, and public transport.**

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

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

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

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

Name or Organisation: Ms Susan Isaac

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

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	Site 358				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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The proposals for **Site 358, Coventry Road, Wolvey**, fail the **Soundness Test** as they are **not justified** and **inconsistent with national policy** for the following reasons:

- **60 homes at Site 358** and **150 homes at Site 309** represent a **disproportionate scale of growth** for the village.
- Both sites lie within the **Green Belt**, contrary to Government policy.
- Combined development (up to **210 homes**) would place **unsustainable pressure on local infrastructure**, including the **primary school, secondary school travel, GP practice, and limited public transport**.
- The Council's **Sustainability Appraisal** notes that Wolvey is a **small rural settlement with a low settlement score**.

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

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

The Local Plan should be revised as follows:

- **Land at Coventry Road, Wolvey (Site 358)** should be **removed from the proposed allocations.**
- **Alternative sites** nearer to the **urban areas of Rugby and Coventry** should be prioritised, offering **better access to services, facilities, employment, and public transport.**

(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: Ms Susan Isaac

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="Site 309"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Policy CL1 (Net Zero Buildings) fails the **Soundness Test** as it is **not justified** and **inconsistent with national policy**.

- The Climate Change section of the Draft Local Plan does not align with the **National Planning Policy Framework**.
- Policy CL1 should also consider the **location of development**, ensuring new housing prioritises **walking, cycling, and access to public transport** in line with national guidance. Wolvey, however, has **limited employment opportunities, no nearby secondary schools, no supermarkets, and very restricted public transport**, making it unsuitable for sustainable development.

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The Local Plan should be revised to include the following:

- Introduce a **Climate Change policy** that clearly directs new development to **sustainable locations**, avoiding small, remote rural villages that are unsuitable for growth.

(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: Ms Susan Isaac

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

Paragraph		Policy	CL2	Policies Map	
Site ID	Site 309				

4. Do you consider the Local Plan:

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

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Policy CL2 (Renewable Energy and Low Carbon Technology) fails the **Soundness Test** as it is **not justified**.

- While the policy's objectives are generally sound, it is **not suitable for implementation on Green Belt sites**.

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

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The Local Plan should be revised as follows:

- **Policy CL2** should be updated to specify that **renewable energy and low-carbon developments are preferred outside the Green Belt**.

(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: Ms Susan Isaac

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="Site 309"/>				

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While the overall aim of **Design Policies D1 to D5** is generally sound, Policy D1 to D5 **fails the Soundness Test** as it is **not justified** for the following reasons:

- The scale of development proposed for Wolvey (a **60% increase in village size**) would significantly **harm the village's character, rural setting, and built form**.
- The potential impacts of such large-scale growth on Wolvey's character **should have been fully assessed** before any site allocations were made.

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

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The Local Plan should be revised as follows:

- **Land north of B4109 (Site 309)** should be **removed from the proposed 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: Ms Susan Isaac

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="EN1"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 309"/>				

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Policy EN1 (Biodiversity and Geodiversity Protection) fails the **Soundness Test** as it is **not justified** and **inconsistent with national policy**:

- **Land north of B4109, Wolvey (Site 309)** borders an existing **Local Wildlife Site**.
- No detailed **ecological assessment** appears to have been carried out. Given the site's location within the **Anker Valley**, a thorough ecological survey is essential before any development decisions are made.

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

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

The Local Plan should be revised as follows:

- **Land north of B4109 (Site 309)** should be **removed from the proposed allocations** to prevent potential ecological impacts.

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

Name or Organisation: Ms Susan Isaac

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="Site 309"/>				

4. Do you consider the Local Plan:

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

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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.

Policy EN2 (Landscape Protection) fails the **Soundness Test** as it is **not justified** and **inconsistent with national policy**:

- **Land north of B4109, Wolvey (Site 309)** was previously identified as having **high sensitivity to housing development**, but this has been overlooked in the Draft Local Plan.
- Developing Site 309 would extend Wolvey into the **Anker Valley**, causing significant harm to the **landscape and character** of the village.

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

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

The Local Plan should be revised as follows:

- **Land north of B4109 (Site 309)** should be **removed from the proposed allocations** to avoid adverse **landscape impacts**.

(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:

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

Name or Organisation: Ms Susan Isaac

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="I1"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 309"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy I1 (Transport) fails the **Soundness Test** as it is **not justified** and **inconsistent with national policy** for the following reasons:

- Wolvey is a **small, remote village** with very limited accessibility and poor public transport—no bus service to Hinckley and only infrequent services to Coventry and Nuneaton—making travel **car-dependent**.
- The village is distant from urban areas, with **no shops, employment, or secondary schools**, and limited leisure and medical facilities. Residents and schoolchildren rely heavily on **private car travel** for daily needs.

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

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

The Local Plan should be revised as follows:

- **Land north of B4109 (Site 309)** should be **removed from the proposed allocations**, as Wolvey has **limited access to key services, facilities, and public transport**.
- **Alternative sites** closer to the **urban areas of Rugby and Coventry** should be prioritised, as these locations offer **better services, employment opportunities, and public transport connections**.

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

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

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

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

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

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

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

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

Name or Organisation: Ms Susan Isaac

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="Site 309"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy I4 (Infrastructure and Planning Obligations) fails the **Soundness Test** as it is **not justified** and **inconsistent with national policy** for the following reasons:

- The scale of development proposed for Wolvey **cannot be supported by existing infrastructure.**
- Key infrastructure shortcomings include:
 - **Primary school** is near capacity and cannot accommodate an additional 70 pupils.
 - **No secondary or SEN schools** in Wolvey, requiring lengthy travel.
 - **GP practice** operates only limited hours, necessitating travel for healthcare.
 - **Local shop** is small and insufficient for weekly shopping needs.
 - **Poor public transport** options.
 - **No dentist, chemist, or hospital** locally, requiring travel.
- It is **unlikely that new development** would deliver sufficient improvements to address these issues.

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

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

The Local Plan should be revised as follows:

- **Land north of B4109 (Site 309) should be removed from the proposed allocations, as there is no justification that existing infrastructure and services could support additional population.**
- **Alternative sites closer to the urban areas of Rugby and Coventry should be prioritised, offering better access to services, facilities, employment, and public transport.**

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

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

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

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

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

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

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

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

Name or Organisation: Ms Susan Isaac

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="Site 309"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy S2 (Strategy for Homes) fails the **Soundness Test** as it is **not justified** for the following reasons:

- The policy promotes an unsustainable pattern of development in rural areas that is not supported by the evidence.
 - It does not align with the preferred **Urban Concentration** strategy, as almost 58% of new housing allocations (excluding those from previous Local Plans or with existing permission) are proposed in rural locations.
- (Continue on a separate sheet /expand box if necessary)

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

The Local Plan should be revised to reflect the following:

- A greater proportion of development should be directed to the **urban areas around Rugby and Coventry**, with reduced growth in Wolvey and other remote rural locations.
- Alternative sites exist that are better placed in terms of **strategic location and sustainability**.

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

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

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

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

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

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: Ms Susan Isaac

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="Site 309"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Policy S5 (Countryside Protection) fails the **Soundness Test** as it is **not justified** for the following reasons:

- The policy is inconsistent with **national planning policy**.
- The Draft Local Plan proposes allocating around **1,500 homes on existing Green Belt land**, which undermines the principle of Green Belt protection.
- Alternative development opportunities outside the **Green Belt** should be considered.
- The Council's evidence attempts to classify established Green Belt as '**Grey Belt**', despite its clear role in preventing countryside encroachment.

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

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

The Local Plan should be revised to reflect the following:

- Allocations and land designations should align with the **National Planning Policy Framework**, with changes to the **Green Belt** only made in clearly justified exceptional circumstances.

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

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

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

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

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

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

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

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

Name or Organisation: Ms Susan Isaac

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="Site 309"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy S6 (Residential Allocations) fails the **Soundness Test** as it is **not justified** and is **inconsistent with national policy**.

Land north of B4109, Wolvey (Site 309) should not be allocated for housing for the following reasons:

- A development of **150 homes** is disproportionate to the size of the existing village.
- The site lies within the **Green Belt**, which conflicts with Government policy.
- Previous landscape assessments identify the site as having **high sensitivity to housing development**, making it unsuitable.
- Part of the site borders a **Local Wildlife Site**, and the ecological impacts have not been adequately assessed.
- Development of this scale (potentially **150–210 homes**) would place significant pressure on local infrastructure, including the **primary school, secondary school travel, GP services and limited public transport**.
- The Council's own **Sustainability Appraisal** states that Wolvey is a **small rural settlement with a low settlement score**.
- For these reasons, the proposal is also inconsistent with **Policy S1 (Settlement Hierarchy), Policy S2 (Strategy for Homes), and Policy S5 (Countryside Protection)**.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with

the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Local Plan should be revised as follows:

- **Policy S6** should remove the proposed allocation of **150 homes at land north of B4109, Wolvey.**
- Alternative sites should instead be considered in **more sustainable and strategically suitable locations**, such as areas adjacent to the **urban areas of Rugby and/or Coventry.**

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

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

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

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

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

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

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

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

Name or Organisation: Ms Susan Isaac

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="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy CL1 (Net Zero Buildings) fails the **Soundness Test** as it is **not justified** and **inconsistent with national policy**.

- The Climate Change section of the Draft Local Plan does not align with the **National Planning Policy Framework**.
- Policy CL1 should also consider the **location of development**, ensuring new housing prioritises **walking, cycling, and access to public transport**. Wolvey, however, has **no local employment, no nearby secondary schools, no supermarkets, and very limited public transport**, making it unsuitable for sustainable development.

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

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

The Local Plan should be revised as follows:

- Introduce a **Climate Change policy** that directs new development to **sustainable locations** and avoids **unsuitable rural villages**.

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

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

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

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

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

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

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

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

Name or Organisation: Ms Susan Isaac

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="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy CL2 (Renewable Energy and Low Carbon Technology) fails the **Soundness Test** as it is **not justified**.

- While the policy's objectives are generally sound, it is **not appropriate for development within the Green Belt**.

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

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

The Local Plan should be revised as follows:

- Policy CL2** should specify that **renewable energy and low-carbon developments are preferred outside the Green Belt**.

(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: Ms Susan Isaac

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="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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While the objectives of **Design Policies D1 to D5** are generally sound, they **fail the Soundness Test** as they are **not justified** for the following reasons:

- The scale of development at **Sites 309 and 358** (a **60% increase in village size**) would **harm Wolvey's character, rural setting, and built form**.
- The potential impacts of such **large-scale growth on village character** should have been fully assessed before proposing these sites for allocation.

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

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

The Local Plan should be revised as follows:

- **Land at Coventry Road, Wolvey (Site 358)** should be **removed from the proposed allocations.**

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

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

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

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

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

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

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

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

Name or Organisation: Ms Susan Isaac

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="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy EN2 (Landscape Protection) fails the **Soundness Test** as it is **not justified** and **inconsistent with national policy**:

- Proposed allocations do not adequately reflect **landscape impact evidence**.
- Site 358** would extend Wolvey into **Green Belt land**, causing significant harm to the **village's landscape and character**.

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

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

The Local Plan should be revised as follows:

- **Land at Coventry Road, Wolvey (Site 358)** should be **removed from the proposed allocations** to avoid adverse **landscape impacts**.

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

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

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

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

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

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

Name or Organisation: Ms Susan Isaac

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="I1"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy I1 (Transport) fails the **Soundness Test** as it is **not justified** and **inconsistent with national policy** for the following reasons:

- Wolvey is a **small, remote village** with very limited accessibility and poor public transport—**no bus to Hinckley** and only infrequent services to Coventry and Nuneaton—making travel **car-dependent**.
- The village is distant from urban areas, with **no shops, employment, or secondary schools**, and limited leisure and medical facilities. Residents and schoolchildren must rely on **private cars** for most travel.

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

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

The Local Plan should be revised as follows:

- **Land at Coventry Road, Wolvey (Site 358)** should be **removed from the proposed allocations**, as Wolvey has **limited access to key services, facilities, and public transport**.
- **Alternative sites** nearer to the **urban areas of Rugby and Coventry** should be prioritised, offering **better access to services, employment, and public transport**.

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

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

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

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

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

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

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

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

Name or Organisation: Ms Susan Isaac

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="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy I4 (Infrastructure and Planning Obligations) fails the **Soundness Test** as it is **not justified** and **inconsistent with national policy** for the following reasons:

- The scale of development proposed for **Wolvey (Sites 309 and 358)** cannot be supported by existing infrastructure.
- Key infrastructure deficiencies include:
 - **Primary school** is near capacity and cannot accommodate additional pupils.
 - **No secondary or SEN schools** in the village, requiring lengthy travel.
 - **GP practice** operates only limited hours, necessitating travel for healthcare.
 - **Local shop** is too small for weekly shopping needs.
 - **Poor public transport** availability.
 - **No dentist, chemist, or hospital** locally, requiring travel.
- It is **unlikely that new development** would provide sufficient improvements to address these shortcomings.

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

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

The Local Plan should be revised as follows:

- **Land at Coventry Road, Wolvey (Site 359)** should be **removed from the proposed allocations**, as there is **no justification that existing infrastructure and services could support additional population**.
- **Alternative sites** closer to the **urban areas of Rugby and Coventry** should be prioritised, providing **better access to services, facilities, employment, and public transport**.

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

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

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

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

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

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

Name or Organisation: Ms Susan Isaac

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="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy S1 (Settlement Hierarchy) fails the **Soundness Test** as it is **not justified** for the following reasons:

- The evidence provided does not support Wolvey's position within the hierarchy.
- Most new development should be directed to the **Rugby Urban Area**, rather than smaller, remote rural locations.
- The definition of '**Main Rural Settlements**' is flawed: Wolvey is the smallest and least well-served rural village, yet it is allocated the **third-highest level of housing growth**.
- Wolvey has **limited services, facilities, employment opportunities, and public transport**.

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

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

Wolvey should be placed in a **lower tier of the settlement hierarchy** with **no large-scale development**, due to its limited services, facilities, employment opportunities, and public transport.

As a **small, remote village**, Wolvey is **unsuitable to accommodate the level of growth currently proposed**.

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

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

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

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

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

Name or Organisation: Ms Susan Isaac

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="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Policy S2 (Strategy for Homes) fails the **Soundness Test** as it is **not justified** for the following reasons:

- The policy encourages an **unsustainable pattern of development in rural areas**, which is not supported by the evidence.
- It **contradicts the preferred Urban Concentration strategy**, allocating nearly **58% of new housing** (excluding existing permissions and previous Local Plan allocations) to rural areas.

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

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

The Local Plan should be revised to reflect the following:

- **Direct more growth to the urban areas of Rugby and Coventry**, reducing allocations in Wolvey and other remote rural locations.
- **Consider alternative sites closer to urban areas**, which offer **better strategic locations and greater sustainability**.

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

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

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

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

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

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

Name or Organisation: Ms Susan Isaac

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

Paragraph	<input type="text"/>	Policy	S5	Policies Map	<input type="text"/>
Site ID	Site 358				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Policy S5 (Countryside Protection) fails the **Soundness Test** as it is **not justified** for the following reasons:

- The policy is **inconsistent with national planning policy**.
- The Draft Local Plan proposes around **1,500 homes on established Green Belt**, which undermines Green Belt protection.
- **Alternative development options outside the Green Belt** should be considered.
- The Council's evidence attempts to reclassify established Green Belt as **'Grey Belt'**, despite its role in **safeguarding the countryside from encroachment**.

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

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

The Local Plan should be revised as follows:

- **Land allocations and designations** should align with the **National Planning Policy Framework**, with **changes to the Green Belt permitted only in exceptional circumstances**.

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

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

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

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

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

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

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

Name or Organisation: Ms Susan Isaac

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="Site 358"/>				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy S6 (Residential Allocations) fails the **Soundness Test** as it is **not justified** and **inconsistent with national policy**.

Land at Coventry Road, Wolvey (Site 358) should not be allocated for housing for the following reasons:

- **60 homes at Site 358** and **150 homes at Site 309** represent a **disproportionate scale of growth** for the village.
- Both sites lie within the **Green Belt**, contrary to Government policy.
- Combined development would place **unsustainable pressure on local infrastructure**, including the **primary school, secondary school travel, GP practice, and limited public transport**.
- The Council's **Sustainability Appraisal** notes Wolvey is a **small rural settlement with a low settlement score**.
- These issues also indicate that the allocations are **inconsistent with Policy S1 (Settlement Hierarchy), Policy S2 (Strategy for Homes), and Policy S5 (Countryside Protection)**.

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

The Local Plan should be revised as follows:

- **Policy S6** should **remove the proposed allocation of 60 homes at Land at Coventry Road, Wolvey.**
- **Alternative sites in more strategically suitable locations**, such as areas adjacent to the **urban areas of Rugby and/or Coventry**, should be prioritised.

(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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