

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official
use only)

**Name of the Local Plan to which
this representation relates:**

Rugby Borough Council Proposed
Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026
By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation**
in the subject line, OR by post to: Development Strategy, Town Hall, Evreux
Way, Rugby, CV21 2RR.

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

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

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	S1	Policies Map	
Site ID	136				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input 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 No.S1 Settlement hierarchy
Soundness test -Not justified

Reasons for Objecting

- Policy S1 is unsound in that it is not 'justified' by the supporting evidence.
- The Rugby Urban Area should accommodate most of the new growth not the less well-served and remote rural areas.
- Specialist housing for over 55's is not 'Justified' by evidence and does not take into account poor transport links to main hospitals along with a lack of district care and limited GP opening hours.
- The suggested 55+ accommodation is also unlikely to offer dwellings that are categorised as affordable (or social) housing. This will impact negatively on older residents in the village who require (and qualify) for access to affordable housing.

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.

Proposed Change

- Wolston should not be considered due to its limited services, facilities, employment and public transport as it is a village unable to accommodate the level of growth proposed.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	S2	Policies Map	
Site ID	136				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input 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 No. S2 Strategy for homes
Soundness test -Not justified

Reasons for Objecting

- Policy S2 is not sound because it provides the basis for an unsustainable pattern of development that is not 'justified' by the evidence.

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.

Proposed Change

- More growth should be directed to the Urban Areas around Rugby and Coventry with a reduction in Wolston and other remote rural areas.
- There are potential alternatives that are superior in terms of their strategic locations and sustainability. e.g. Rugby Town Centre

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	S5	Policies Map	
Site ID	136				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	

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

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Policy No. S5 Countryside protection
Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

- The Draft Local Plan seeks to allocate some 1,500 new homes on land that would need to be released from the established Green Belt. This does not 'protect' Green Belt.
- There are development options outside of the Green Belt 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 needed to safeguard the countryside from encroachment

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.

Proposed Change

- Allocations and designations should follow the National Planning Policy Framework and only allow changes to the Green Belt in exceptional cases.
- The development proposed at site 136 is not dissimilar to that proposed in planning application R19/0167, which was refused in line with the then current NPPF guidance,

i.e., it constituted inappropriate development within the Green Belt due to the detrimental impact on the openness of the area by virtue of the extent of potential built form that would be provided.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text" value="S6"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="136"/>				

4. Do you consider the Local Plan:

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

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

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Policy No. S6 Residential allocations

Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

Land north of Warwick Road, Wolston should not be allocated for housing for reasons set out below:

- 80 new homes are disproportionate of scale with the current village.
- The proposed allocation is within the Green Belt –contrary to Government Policy.
- Previous landscape studies have indicated that the land has 'High sensitivity to housing development'. It is therefore not suitable.
- Part of the site abuts a Local Wildlife Site. There has not been a sufficient assessment of the ecological impacts.
- The submission of 80 homes (and up to 95 homes) is too much for Wolston's infrastructure in terms of pressure on: the primary school, travel to secondary school, GP practice, lack of parking and the very limited public transport availability.
- The Council's own Sustainability Appraisal indicates that "Wolston is a notably small main rural settlement with a high settlement score".

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

Proposed Change

- Policy S6 should delete the proposed allocation of 80 new homes at 'land north of Warwick Road, Wolston and 15 homes at Dyers Lane, Wolston.
- Alternative sites should be considered in strategically preferable locations (such as adjacent to the urban areas of Rugby and/or Coventry)

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

Name or Organisation: Jennifer Lumsden

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

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

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	

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

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Policy No. CL1 Net zero buildings

Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

- The Climate change section of the emerging Local Plan is not sound because it is not consistent with the National Planning Policy Framework.
- Policy CL1 should also address the 'location' of development to ensure that new housing seeks to maximise walking and cycling (the most sustainable modes of travel) alongside good access to public transport in accordance with the National Planning Policy Framework, notwithstanding that this is unlikely to be attractive to the 55+ client group,

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.

Proposed Change

- There should be an additional Climate Change policy that sets out the Council's aspirations for locating growth in sustainable locations.
- Policy should be amended to ensure that solar panels and other energy saving options are included in large scale warehouse building in urban areas.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	CL2	Policies Map	
Site ID	136				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	

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

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Policy No. CL2 Renewable energy and low carbon technology

Soundness test – Mostly Sound

Reasons for Objecting

- Renewable energy and low carbon energy development are inappropriate development in the Green Belt.

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.

Proposed Change

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

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

Name or Organisation: Jenifer Lumsden

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text" value="EN1"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="136"/>				

4. Do you consider the Local Plan:

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

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

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Policy No. EN1 Biodiversity and Geodiversity protection
Soundness test - Not justified or consistent with National Policy

Reasons for Objecting

- The proposed allocations Land north of Warwick Road, Wolston is adjacent to an existing Local Wildlife site.
- A proportionate ecological assessment should have been undertaken.

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.

Proposed Change

• The potential ecological impacts mean that Site 136- Land north of Warwick Road, Wolston and that Site 39- Land on Dyers Lane, Wolston should be removed from the plan as a proposed allocation.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	EN2	Policies Map	
Site ID	136				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(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.

Policy No. EN2 Landscape protection
Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

• Allocations proposed in the emerging Local Plan do not reflect the available evidence in terms of impacts on the landscape. Site 136- Land north of Warwick Road, Wolston and that Site 39- Land on Dyers Lane, Wolston. Previous evidence indicated that the site had 'High sensitivity to housing development' in landscape terms.

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.

Proposed Change

- The potential landscape impacts mean that Site 136 Land north of Warwick Road, Wolston and that Site 39- Land on Dyers Lane, Wolston should be removed from the plan as a proposed allocation.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	EN5	Policies Map	
Site ID	136				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	

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

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Policy No. EN5 Biodiversity net gain
Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

- Policy EN5 is neither sound nor justified as an ecological appraisal has not been carried out at Site 136 – Land North of Warwick Road - which is inconsistent with national policy and the requirement to 'safeguard components of local wild-life rich habitats'.

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.

Proposed Change

• Any development proposal at Site 136 should be mitigated by a 'development requirement' to leave the pond and its surroundings untouched.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	EN7	Policies Map	
Site ID	136				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	

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

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Policy No. EN7 Flood Risk
Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

• Policy EN7 is welcome as this aligns with national policy and seeks to reduce overall flood risk.
 • The Storm Henk flood event in January 2024 saw 19 properties internally flooded and 11 properties externally flooded in the village. The subsequent S19 report acknowledged that a development site under construction at the time had not yet connected the surface water drainage system to the site wide attenuation basin there fore any flows originating on the site were not attenuated within the site boundary and therefore ran off site and down to the centre of the village.

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.

Proposed Change

• No development should be progressed until the LLFAs have given reassurance that all flood risks following the flood events of 2024 and 2025 have been effectively mitigated in line with the national policy that requires any development to be made safe for its lifetime without increasing flood risk elsewhere.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	I1	Policies Map	<input type="text"/>
Site ID	136				

4. Do you consider the Local Plan:

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

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Policy No. 11 Transport

Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

- Wolston is a remote village with modest accessibility and poorly served by public transport.
- The proposed new homes are remote from urban areas with shops, jobs, leisure and medical facilities. Wolston has very limited services and facilities meaning car travel is essential.
- There is a very limited bus service that connect Wolston to Rugby and Coventry and none to Leamington Spa.

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.

Proposed Change

- Specialist housing sites should be removed from the Local Plan because Wolston does not have good access to higher level services and facilities and poor public transport.
- There are better options close to the Urban Areas of Rugby and Coventry that should be considered first. Rugby has better services, facilities and employment opportunities and public transport.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	I4	Policies Map	<input type="text"/>
Site ID	136				

4. Do you consider the Local Plan:

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

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Policy No. I4 Infrastructure and planning obligations
Soundness test -Not justified or consistent with National Policy
Reasons for Objecting

- The scale of development proposed for the village of Wolston is not capable of being supported by the available infrastructure.
- Important areas of infrastructure that are lacking include:
 - The primary school which near capacity and cannot accommodate an additional influx of pupils.
 - The GP practice is only open on limited hours (and only for part of the day) requiring long journeys
 - The shop is small and not suitable for a weekly shop –requiring long journeys
 - Public transport is poor
 - There is no dentist or hospital – requiring long journeys
- Improvements would be unlikely because of new development.

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.

Proposed Change

- The proposed housing sites should be removed from the draft plan because it has not been justified that the available infrastructure can accommodate them.
- There are better options close to the Urban Areas of Rugby and Coventry that have better services and facilities which are more easily accessible.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	D1 to D5	Policies Map	
Site ID	136				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(3) complies with the Duty to co-operate	Yes		No	

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

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Policy No. D1 to D5 Design policies
Soundness test – Mostly Sound

Reasons for Objecting

- Design policies D1 to D5 that seek to improve design quality are welcome.
- The scale of development proposed for Wolston (a 10% increase in village size) would harm local character, rural setting and built form.

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

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Proposed Change

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	136				

4. Do you consider the Local Plan:

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

Site: 136 – Land North of Warwick Road, Wolston
Soundness test - Not justified or consistent with National Policy

Reasons for Objecting

Land north of Land north of Warwick Road, Wolston should not be allocated for housing for reasons set out below:

- The new homes are of a disproportionate scale with the current village.
- The proposed allocation is within the Green Belt – contrary to Government Policy.
- Previous landscape studies have indicated that the land has 'High sensitivity to housing development'. It is therefore not suitable.
- Part of the site abuts a Local Wildlife Site. There has not been a sufficient assessment of the ecological impacts.

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.

Proposed Change

- Site 136 should be deleted as a proposed allocation of 80 specialist homes at 'landnorth of Warwick Road, Wolston'.
- Alternative sites should be considered in strategically preferable locations (such as adjacent to the urban areas of Rugby and/ or Coventry)

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	39				

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 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.

Site: 39 at Dyers Lane, Wolston

Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

Land at Dyers Lane, Wolston, should not be allocated for housing for reasons set out below:

- The proposed allocation is within the Green Belt – contrary to Government Policy.

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.

Proposed Change

- Site 39 should be deleted as a proposed allocation of 15 homes at 'Land at Dyers Lane, Wolston'
- Alternative sites should be considered in strategically preferable locations (such as adjacent to the urban areas of Rugby and/or Coventry)

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	S1	Policies Map	<input type="text"/>
Site ID	39				

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 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 No.S1 Settlement hierarchy
Soundness test -Not justified

Reasons for Objecting

- Policy S1 is unsound in that it is not 'justified' by the supporting evidence.
- The Rugby Urban Area should accommodate most of the new growth not the less well-served and remote rural areas.
- Specialist housing for over 55's is not 'Justified' by evidence and does not take into account poor transport links to main hospitals along with a lack of district care and limited GP opening hours.
- The suggested 55+ accommodation is also unlikely to offer dwellings that are categorised as affordable (or social) housing. This will impact negatively on older residents in the village who require (and qualify) for access to affordable housing.

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.

Proposed Change

• Wolston should not be considered due to its limited services, facilities, employment and public transport as it is a village unable to accommodate the level of growth proposed.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	S2	Policies Map	<input type="text"/>
Site ID	39				

4. Do you consider the Local Plan:

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

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

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

Policy No. S2 Strategy for homes
Soundness test -Not justified

Reasons for Objecting

• Policy S2 is not sound because it provides the basis for an unsustainable pattern of development that is not 'justified' by the evidence.

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.

Proposed Change

- More growth should be directed to the Urban Areas around Rugby and Coventry with a reduction in Wolston and other remote rural areas.
- There are potential alternatives that are superior in terms of their strategic locations and sustainability. e.g. Rugby Town Centre

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	S5 <input type="text"/>	Policies Map	<input type="text"/>
Site ID	39				

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 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 No. S5 Countryside protection
Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

- The Draft Local Plan seeks to allocate some 1,500 new homes on land that would need to be released from the established Green Belt. This does not 'protect' Green Belt.
- There are development options outside of the Green Belt 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 needed to safeguard the countryside from encroachment

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.

Proposed Change

- Allocations and designations should follow the National Planning Policy Framework and only allow changes to the Green Belt in exceptional cases.
- The development proposed at site 136 is not dissimilar to that proposed in planning application R19/0167, which was refused in line with the then current NPPF guidance, i.e., it constituted inappropriate development within the Green Belt due to the detrimental impact on the openness of the area by virtue of the extent of potential built form that would be provided.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	S6	Policies Map	<input type="text"/>
Site ID	39				

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 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 No. S6 Residential allocations

Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

Land north of Warwick Road, Wolston should not be allocated for housing for reasons set out below:

- 80 new homes are disproportionate of scale with the current village.
- The proposed allocation is within the Green Belt –contrary to Government Policy.
- Previous landscape studies have indicated that the land has 'High sensitivity to housing development'. It is therefore not suitable.
- Part of the site abuts a Local Wildlife Site. There has not been a sufficient assessment of the ecological impacts.
- The submission of 80 homes (and up to 95 homes) is too much for Wolston's infrastructure in terms of pressure on: the primary school, travel to secondary school, GP practice, lack of parking and the very limited public transport availability.
- The Council's own Sustainability Appraisal indicates that "Wolston is a notably small main rural settlement with a high settlement score".

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

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

Proposed Change

- Policy S6 should delete the proposed allocation of 80 new homes at 'land north of Warwick Road, Wolston and 15 homes at Dyers Lane, Wolston.
- Alternative sites should be considered in strategically preferable locations (such as adjacent to the urban areas of Rugby and/or Coventry)

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	CL1	Policies Map	
Site ID	39				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(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.

Policy No. CL1 Net zero buildings

Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

- The Climate change section of the emerging Local Plan is not sound because it is not consistent with the National Planning Policy Framework.
- Policy CL1 should also address the 'location' of development to ensure that new housing seeks to maximise walking and cycling (the most sustainable modes of travel) alongside good access to public transport in accordance with the National Planning Policy Framework, notwithstanding that this is unlikely to be attractive to the 55+ client group,

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.

Proposed Change

- There should be an additional Climate Change policy that sets out the Council's aspirations for locating growth in sustainable locations.
- Policy should be amended to ensure that solar panels and other energy saving options are included in large scale warehouse building in urban areas.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	CL2	Policies Map	<input type="text"/>
Site ID	39				

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 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 No. CL2 Renewable energy and low carbon technology
Soundness test – Mostly Sound

Reasons for Objecting

- Renewable energy and low carbon energy development are inappropriate development in the Green Belt.

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.

Proposed Change

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

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	EN1	Policies Map	
Site ID	39				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(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.

Policy No. EN1 Biodiversity and Geodiversity protection
Soundness test - Not justified or consistent with National Policy

Reasons for Objecting

• The proposed allocations Land north of Warwick Road, Wolston is adjacent to an existing Local Wildlife site.
 • A proportionate ecological assessment should have been undertaken.

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.

Proposed Change

• The potential ecological impacts mean that Site 136- Land north of Warwick Road, Wolston and that Site 39- Land on Dyers Lane, Wolston should be removed from the plan as a proposed allocation.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	EN2	Policies Map	
Site ID	39				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(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.

Policy No. EN2 Landscape protection
Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

• Allocations proposed in the emerging Local Plan do not reflect the available evidence in terms of impacts on the landscape. Site 136- Land north of Warwick Road, Wolston and that Site 39- Land on Dyers Lane, Wolston. Previous evidence indicated that the site had 'High sensitivity to housing development' in landscape terms.

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.

Proposed Change

- The potential landscape impacts mean that Site 136 Land north of Warwick Road, Wolston and that Site 39- Land on Dyers Lane, Wolston should be removed from the plan as a proposed allocation.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	EN5	Policies Map	
Site ID	39				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(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.

Policy No. EN5 Biodiversity net gain

Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

- Policy EN5 is neither sound nor justified as an ecological appraisal has not been carried out at Site 136 – Land North of Warwick Road - which is inconsistent with national policy and the requirement to 'safeguard components of local wild-life rich habitats'.

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.

Proposed Change

• Any development proposal at Site 136 should be mitigated by a 'development requirement' to leave the pond and its surroundings untouched.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	EN7	Policies Map	
Site ID	39				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(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.

Policy No. EN7 Flood Risk
Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

• Policy EN7 is welcome as this aligns with national policy and seeks to reduce overall flood risk.
 • The Storm Henk flood event in January 2024 saw 19 properties internally flooded and 11 properties externally flooded in the village. The subsequent S19 report acknowledged that a development site under construction at the time had not yet connected the surface water drainage system to the site wide attenuation basin there fore any flows originating on the site were not attenuated within the site boundary and therefore ran off site and down to the centre of the village.

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.

Proposed Change

• No development should be progressed until the LLFAs have given reassurance that all flood risks following the flood events of 2024 and 2025 have been effectively mitigated in line with the national policy that requires any development to be made safe for its lifetime without increasing flood risk elsewhere.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	I1	Policies Map	<input type="text"/>
Site ID	39				

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 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 No. 11 Transport

Soundness test -Not justified or consistent with National Policy

Reasons for Objecting

- Wolston is a remote village with modest accessibility and poorly served by public transport.
- The proposed new homes are remote from urban areas with shops, jobs, leisure and medical facilities. Wolston has very limited services and facilities meaning car travel is essential.
- There is a very limited bus service that connect Wolston to Rugby and Coventry and none to Leamington Spa.

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.

Proposed Change

- Specialist housing sites should be removed from the Local Plan because Wolston does not have good access to higher level services and facilities and poor public transport.
- There are better options close to the Urban Areas of Rugby and Coventry that should be considered first. Rugby has better services, facilities and employment opportunities and public transport.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	I4	Policies Map	
Site ID	136				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(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.

Policy No. 14 Infrastructure and planning obligations
Soundness test -Not justified or consistent with National Policy
Reasons for Objecting

- The scale of development proposed for the village of Wolston is not capable of being supported by the available infrastructure.
- Important areas of infrastructure that are lacking include:
 - The primary school which near capacity and cannot accommodate an additional influx of pupils.
 - The GP practice is only open on limited hours (and only for part of the day) requiring long journeys
 - The shop is small and not suitable for a weekly shop –requiring long journeys
 - Public transport is poor
 - There is no dentist or hospital – requiring long journeys
- Improvements would be unlikely because of new development.

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.

Proposed Change

- The proposed housing sites should be removed from the draft plan because it has not been justified that the available infrastructure can accommodate them.
- There are better options close to the Urban Areas of Rugby and Coventry that have better services and facilities which are more easily accessible.

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

Name or Organisation: Jennifer Lumsden

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

Local Plan Paragraph		Local Plan Policy	D1 to D5	Policies Map	
Site ID	39				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	X
(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.

Policy No. D1 to D5 Design policies
Soundness test – Mostly Sound

Reasons for Objecting

- Design policies D1 to D5 that seek to improve design quality are welcome.
- The scale of development proposed for Wolston (a 10% increase in village size) would harm local character, rural setting and built form.

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.

Proposed Change

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)?

X

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

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

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

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

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

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

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

The Rugby Borough Council Privacy Notice for Development Strategy is available here:

<https://www.rugby.gov.uk/w/privacy#development-strategy>

The Planning Inspectorate's privacy notice can be accessed here: <https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices>