

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="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Paul"/>	<input type="text"/>
Last Name	<input type="text" value="Mallabone"/>	<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" value="██████████"/>	<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: Paul Mallabone

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

Paragraph		Policy	CL1	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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

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

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The Climate change appears not to be sound. It is not allied to the National Planning Policy Framework. Policy CL1 should also address the 'location' of any development to ensure walking and cycling alongside good access to public transport are available which are in accordance with the National Planning Policy Framework.

(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.

There should be a Climate Change policy that sets out the Council's considerations to minimise environmental impact and access to existing services and facilities.

(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

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: Paul Mallabone

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

Paragraph		Policy	CL2	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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

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

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Renewable energy and low carbon energy developments are against the fundamental aim of the green belt

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

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Policy CL2 needs to be amended to identify that locations for renewable energy outside of the green belt are preferred.

(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: Paul Mallabone

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

Paragraph		Policy	D1 to D5	Policies Map	
Site ID	309 & 358				

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

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

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Design policies D1 to D5 that want to improve design quality are encouraged. However, the scale of development proposed for Wolvey would increase the size of the village by 60% and would harm local character, rural setting and village nature.

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 undoubted impacts of large-scale growth on the character and nature of Wolvey should have been fully considered before locations were proposed as allocations.

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

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

Name or Organisation: Paul Mallabone

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

Paragraph		Policy	EN2	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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

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The developments proposed in the local plan do not show the available evidence of impacts on the landscape. The site at land north off B4109 has previous evidence indicated that the site had 'High sensitivity to housing development'. The described development at land north of B4109 would expand the village significantly towards the river Anker along the valley. This would have a large impact on the character 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.

The potential landscape impacts mean that Land north of B4109 should be removed from the plan as a proposed development.

(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: Paul Mallabone

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

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

4. Do you consider the Local Plan:

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The scale of development proposed for the village of Wolvey is not capable of being supported by the available infrastructure and services.

Important areas of infrastructure and services that are lacking include:

- The primary school is close to capacity and cannot accommodate another considerable influx of pupils.
- There are no secondary or special education needs school in Wolvey requiring long journeys.
- The GP practice is only open on limited hours and days requiring long journeys
- The shop is small and not suitable for a weekly shop – requiring long journeys
- Public transport is infrequent and unreliable driven by profit maximizing companies who reduce services.
- There are no dentist, chemist or NHS drop-in centre – requiring long journeys
- Improvements would be unlikely to materialise because of a new development.

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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 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.

(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: Paul Mallabone

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

Paragraph		Policy	S1	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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I believe policy S1 to be unsound in that it is not 'justified' by the supporting evidence. The Rugby Urban Area should accommodate the majority of new, prospective developments growth not the smaller rural less well-served and remote areas. The 'Main Rural Settlements' definition is not sound - Wolvey is the smallest and least well-served of all the identified villages yet has the third highest housing allocation.
This is not sustainable as highlighted and identified in my policy I4 objection

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

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Wolvey should be in a lower category in the list of villages for development because of its limited services, facilities, employment and public transport, again as identified in objection policy I4
It is a small remote village unable to accommodate the level of growth proposed.

(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: Paul Mallabone

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

Paragraph		Policy	S2	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No
(2) is Sound	Yes		No
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I believe policy S2 is not sound. It provides the basis of an unsustainable pattern of development that is not justified and appropriate set against the evidence outlined. The policy does not support the overall preferred strategy of urban concentration which is clearly more appropriate in particular, infrastructure and services – it proposes nearly 60% of new allocations, over and above those in previous local plans and already with permission, in the rural areas.

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

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

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Name or Organisation: Paul Mallabone

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="S5"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="309 & 358"/>				

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(1) is Legally compliant	Yes	<input type="text" value="Yes"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input type="text" value="No"/>
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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 or support green belt.

There are development options outside of the green belt that should be explored and are better opportunities utilising considerable infrastructure and more accessible services.

The Council's supposition is artificial and wants to identify large areas of green belt to be redesignated as grey belt – these green belt areas are needed to safeguard the countryside from encroachment and protecting villages, part of British life, into becoming mini towns that have insufficient infrastructure and services

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

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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.

Allocations and designations should follow the National Planning Policy Framework and only allow changes to the green belt in exceptional cases. When there are more appropriate areas for growth development, then the proposed Wolvey development is not an exceptional case.

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

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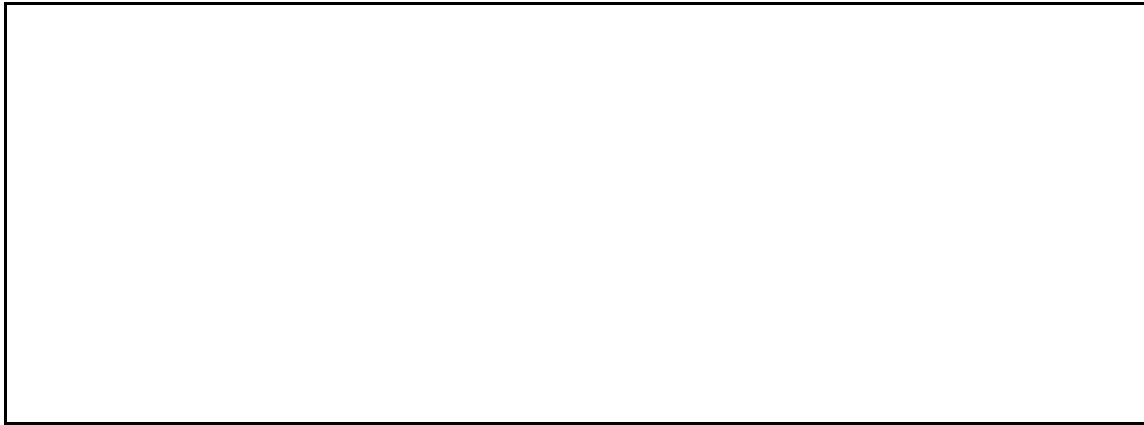
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Name or Organisation: Paul Mallabone

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

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

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

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

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

- 150 new homes are too many when compared against the number of dwellings currently in the village.
- The proposed allocation is within the green belt – contrary to Government Policy. This policy should not be ignored just by changing a colour from green to grey
- Previous landscape studies have indicated that the land has 'High sensitivity to housing development'. It is therefore not suitable. This should not be ignored
- Part of the site abuts a Local Wildlife Site. There has not been a sufficient assessment of the ecological impacts.
- 150 homes (and up to 210 homes) is too much for Wolvey's infrastructure in terms of pressure on: the primary school, travel to secondary school, GP practice, and the very limited public transport availability.
- The Council's own Sustainability Appraisal indicates that "Wolvey is a notably small main rural settlement with a low settlement score". The Council should not ignore its own findings to increase a small rural settlement by 60%

(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.

Please consider this proposal.

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

(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.

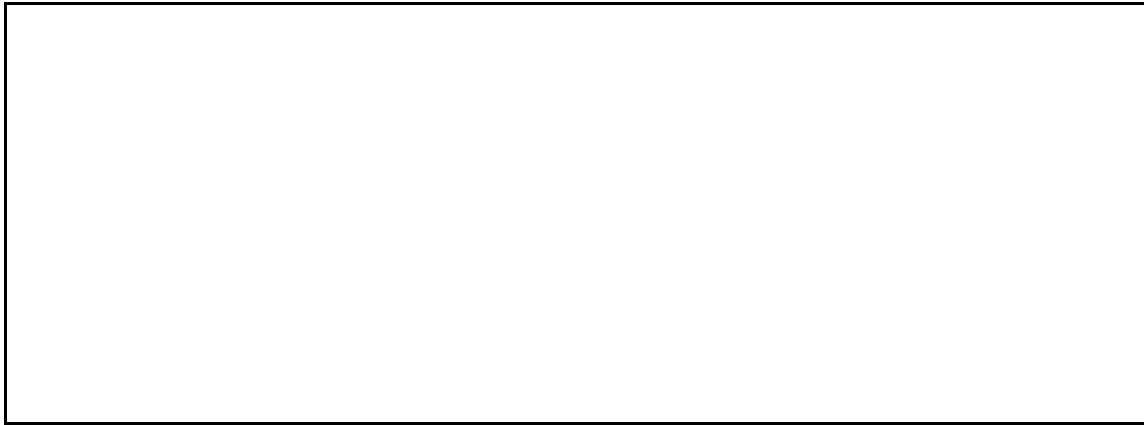
7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No **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.

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

Name or Organisation: Paul Mallabone

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

Paragraph	PP138	Policy		Policies Map	
Site ID	309				

4. Do you consider the Local Plan:

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

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

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

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

- 150 new homes are too many when compared against the number of dwellings currently in the village.
- The proposed allocation is within the Green Belt – contrary to Government Policy. This policy should not be ignored by changing a colour from green to grey.
- Previous landscape studies have indicated that the land has 'High sensitivity to housing development'. It is therefore not suitable. This should not be ignored.
- Part of the site abuts a Local Wildlife Site. There has not been a sufficient assessment of the ecological impacts.
- 150 homes (and up to 210 homes) is too much for Wolvey's infrastructure in terms of pressure on: the primary school, travel to secondary school, GP practice, and the very limited public transport availability.
- The Council's own Sustainability Appraisal indicates that "Wolvey is a notably small main rural settlement with a low settlement score". The Council should not its own findings to increase a small rural settlement by 60%

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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

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

(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 **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: Paul Mallabone

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

Paragraph	PP137	Policy		Policies Map	
Site ID	358				

4. Do you consider the Local Plan:

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

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

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

Land at Coventry Road, Wolvey, should not be allocated for housing for reasons set out below:

- The proposed allocation is within the Green Belt – contrary to Government Policy. This policy should not be ignored just by changing a colour from green to grey.
- The Council’s own Sustainability Appraisal indicates that “Wolvey is a notably small main rural settlement with a low settlement score”. The Council should not ignore its own findings to increase a small rural settlement by 60%

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

Site 358 should be deleted as a proposed allocation of 60 homes at 'Land at Coventry Road, Wolvey'.

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

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

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.

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