

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 by post to: Development Strategy, Town
Hall, Evreux Way, Rugby, CV21 2RR

This form has two parts –

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

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

Part A

1. Personal
Details*

2. Agent's Details (if
applicable)

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

Title	Mrs	
First Name	Rebecca	
Last Name	Maoudis	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	████████████████████ ██████████	
Line 2		
Line 3		
Line 4		
Post Code	████████	
Telephone Number	██████████	
E-mail Address (where relevant)	████████████████████	

Part B – Please use a separate sheet for each representation

Name or Organisation:

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"/>
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Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

(2) is Sound

No

(3) complies with the Duty to co-operate

Yes

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.

Sustainability considerations need to be carefully examined in relation to Wolvey's role within the settlement hierarchy. The village has been assessed as having the lowest sustainability score of the main rural settlements. Access to employment opportunities, higher order services and public transport is limited. Residents are therefore heavily reliant on private vehicles for many daily journeys, including commuting, education, healthcare and shopping. Allocating substantial new housing development in such a location risks reinforcing patterns of car dependency.

This issue is particularly relevant in the context of the Council's declaration of a climate emergency. Planning decisions taken through the Local Plan will shape development patterns for decades to come. Locating large amounts of new housing in settlements with limited sustainable transport options inevitably leads to increased car use and associated carbon emissions. While a dispersed development strategy may allow housing numbers to be

distributed across multiple settlements, it also risks embedding travel patterns that are inconsistent with long term climate objectives.

In addition, it is important to note that the proposed development sites around Wolvey are located within the Green Belt. Development within the Green Belt should only occur in exceptional circumstances through the Local Plan process and where it is clearly justified. The fields surrounding Wolvey currently perform an important Green Belt function by maintaining the separation between settlements, preserving the open rural character of the area and safeguarding the countryside from encroachment. The allocation of large-scale housing development in this location therefore represents a significant policy decision that requires strong and transparent justification, particularly where the land also performs landscape, ecological and floodplain functions.

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

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

Site 358 should be removed as a proposed allocation of 60 homes at land at Coventry Road, Wolvey. Alternative sites should be considered in strategically preferable locations such as the urban areas of Rugby.

(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)

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/v/privacy#development-strategy>

The Planning Inspectorate's privacy notice can be accessed here:

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In 2016 a comprehensive landscape assessment was undertaken by professional landscape architects as part of the evidence base informing the Local Plan process. That assessment concluded that, with the exception of one small site, the areas surrounding Wolvey were highly sensitive from a landscape perspective and unsuitable for development. These findings were based on professional analysis and were not a political judgement but independent technical evidence. The landscape around Wolvey, particularly the open fields associated with the Anker Valley, was identified as forming an important part of the rural character and environmental setting of the settlement.

In the current Local Plan evidence base, however, those same areas of landscape have been reassessed and are now described as having significantly lower sensitivity, thereby making them available for development. The fields surrounding Wolvey that were previously regarded as unsuitable for development have effectively been reclassified as potential

housing land. No material changes have occurred within the landscape itself that would justify such a reassessment. The physical characteristics of the valley, the topography, the river corridor and the ecological context remain the same. This raises legitimate questions about the robustness and transparency of the evidence base supporting the revised classification.

For a Local Plan to be found sound it must be justified, meaning that it must be based on proportionate and credible evidence. Where the conclusions of earlier professional work are reversed without a clear and convincing explanation, the credibility of the evidence base is weakened. In the absence of any substantive change on the ground, the reassessment of the Wolvey landscape appears to be driven by the need to identify additional housing land rather than by an objective change in landscape sensitivity.

The environmental value of the Anker Valley, particularly in relation to the River Anker corridor and associated wildlife habitats, deserves careful protection and should be treated with the same seriousness that has been applied to other sensitive valley landscapes within the borough. Furthermore, the sustainability implications of locating significant development in a highly car dependent rural settlement must be considered in light of the Council's climate commitments.

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

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Site 309 should be removed as a proposed allocation of 150 homes at land north of B4109, Wolvey. Alternative sites should be considered in strategically preferable locations such as the urban areas of Rugby.

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