

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="Matthew"/>	<input type="text"/>
Last Name	<input type="text" value="Pare"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
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Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

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

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
(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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I consider Policy S2 is not sound because it provides the basis for an unsustainable pattern of development that is not 'justified' by the evidence. The policy does not reflect the overall preferred strategy of Urban Concentration – it proposes nearly 58% 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)

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.

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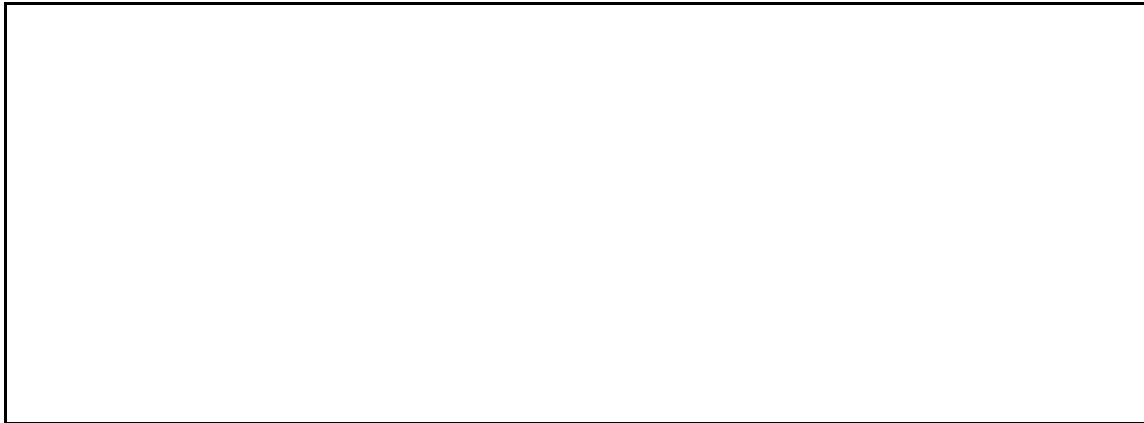
7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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:

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

Paragraph		Policy	CL1	Policies Map	
Site ID	309 & 358				

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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.

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

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

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

Name or Organisation:

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

Paragraph	PP138	Policy		Policies Map	
Site ID	309				

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

- 150 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.
- 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".

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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)

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

Name or Organisation:

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

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

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Although mostly sound. Design policies D1 to D5 that seek to improve design quality are welcome.
However the scale of development proposed for Wolvey (a 60% increase in village size) would harm local character, rural setting and built form.
(Continue on a separate sheet /expand box if necessary)

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The potential impacts of large-scale growth on the character of Wolvey needed to have been fully considered before sites were proposed as allocations.

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

Name or Organisation:

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

Paragraph		Policy	EN2	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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Allocations proposed in the emerging Local Plan do not reflect the available evidence in terms of impacts on the landscape. In particular the site at Land north of B4109. Previous evidence indicated that the site had 'High sensitivity to housing development' in landscape terms. The allocation at Land north of B4109 would extend the village substantially towards the River Anker along the valley slopes. This would have a large impact on the character of the village.

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

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Although mostly sound, Renewable energy and low carbon energy development are inappropriate development in the Green Belt.

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

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Representation Form for Local Plans



Local Plan Publication Stage Representation Form

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**Name of the Local Plan to which
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Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

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

Paragraph		Policy	S1	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.

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 consider 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 growth not the less well-served and remote rural areas. The 'Main Rural Settlements' definition is not sound - Wolvey is the smallest and least well-served of all the Rural Villages yet has the third highest housing allocation.

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

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

I believe Wolvey should be in a lower category in the hierarchy because of its limited services, facilities, employment and public transport.
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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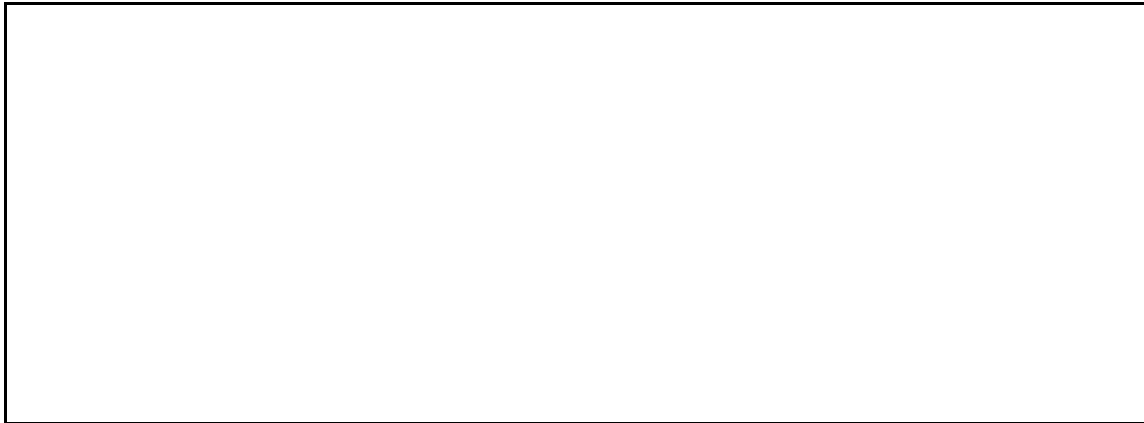
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No **No**, I do not wish to participate in hearing session(s)

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:

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

Paragraph		Policy	I1	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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Wolvey is a small 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. Wolvey has very limited services and facilities meaning car travel is essential. There is a very limited bus service that connect Wolvey to Nuneaton and Coventry and none to the nearest town of Hinckley.

(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.

Large housing sites should be removed from the Local Plan because Wolvey 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.

(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:

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
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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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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.
- The Council’s own Sustainability Appraisal indicates that “Wolvey is a notably small main rural settlement with a low 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.

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)

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

Name or Organisation:

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Paragraph		Policy	S5	Policies Map	
Site ID	309 & 358				

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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' 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

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

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Allocations and designations should follow the National Planning Policy Framework and only allow changes to the Green Belt in exceptional cases.

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

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

Name or Organisation:

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

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

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Although mostly sound. Design policies D1 to D5 that seek to improve design quality are welcome.
However the scale of development proposed for Wolvey (a 60% increase in village size) would harm local character, rural setting and built form.
(Continue on a separate sheet /expand box if necessary)

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

The potential impacts of large-scale growth on the character of Wolvey needed to have been fully considered before sites were proposed as allocations.

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

Name or Organisation:

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

Paragraph		Policy	CL2	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No
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Although mostly sound, Renewable energy and low carbon energy development are inappropriate development in the Green Belt.

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

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

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 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.

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-notice>