

10 MAR 2026

RECEIVED

## Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

Dept: \_\_\_\_\_  
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 13<sup>th</sup> March 2026**  
By email to: [localplan@rugby.gov.uk](mailto: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	Mr	
First Name	John	
Last Name	Randle	
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 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				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Yes	No	
(2) is Sound	Yes		No	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 should not be allocated for housing reasons as:
- The proposed allocation is within the Green Belt
- Previous landscape studies have shown that the land has 'High sensitivity to housing development@ and is therefore not suitable
- Part of this site abuts a Local Wildlife Site
- Wolvey does not have the infrastructure to support a development of this size
- The area is known for flooding
- The Council's own Sustainability Appraisal Wolvey has a very low settlement score and is not suitable for this scale of development

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

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

- 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)
- The environmental impact means that this development should not be proposed

**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

**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	EN2	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

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- The site at Land north of B4109. Previous evidence indicated that the site had 'High sensitivity to housing development' in landscape terms.
- Allocations proposed in the emerging Local Plan do not reflect the available evidence in terms of impacts on the landscape.
- The land is part of a flood plain and is totally unsuitable for building.

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

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The potential landscape and environmental impacts, as well as the practical difficulties mean that Land north of B4109 should be removed from the plan as a proposed allocation.  
Alternative sites should be considered

(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	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. Realistically you must use a car to go anywhere as there are no public transport options serving Wolvey

(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. Wolvey is clearly unsuitable.

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

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- The proposed allocation (Land north of B4109, Wolvey) is adjacent to an existing Local Wildlife site.
  - A proportionate ecological assessment should have been undertaken, which would have shown the unsuitability of this land.
  - Clearly this land is unsuitable for development at all
  - The Councils own historic reports show that this land is not suitable

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The potential ecological impacts mean that Land north of B4109 should be removed from the plan as a proposed allocation.  
Alternative sites have been proposed and should be considered as an alternative as this sight is not suitable for housebuilding

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Although mostly sound, Renewable energy and low carbon energy development are inappropriate development in the Green Belt, especially in the area here, which is valuable greenbelt land

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Policy CL2 should be amended to specifically refer to locations for renewable energy outside of the Green Belt being preferred, which would exclude an area like Wolvey

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