

10 MAR 2026

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Dept: \_\_\_\_\_

Ref: \_\_\_\_\_

## Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

(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	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Susan"/>	<input type="text"/>
Last Name	<input type="text" value="Randle"/>	<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="[REDACTED]"/>	<input type="text"/>
Line 2	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Telephone Number	<input type="text" value="[REDACTED]"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

## 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
(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 is unsuitable for the allocated housing as:
- The proposed allocation is within the Green Belt and should be protected
- Previous landscape studies have shown that the land has 'High sensitivity to housing development' and is therefore not suitable
- Part of this site is next to a Local Wildlife Site
- Wolvey does not have the infrastructure to support a development of this size
- The area is known for regularly 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'.
- More suitable sites should be considered in strategically preferable locations (such as adjacent to the urban areas of Rugby and/ or Coventry where the infrastructure is available)
- 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**, 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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The Rugby Borough Council Privacy Notice for Development Strategy is available here:

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

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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				

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.

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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 available.

(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 not an area that fits within this policy

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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
(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.

Although mostly sound, Renewable energy and low carbon energy development are inappropriate development in the Green Belt, especially in the areas in Wolvey proposed

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

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

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

Paragraph		Policy	EN1	Policies Map	
Site ID	309				

4. Do you consider the Local Plan:

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

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- The proposed allocation (Land north of B4109, Wolvey) is next to a valuable Local Wildlife site, which would be severely impacted by this development
  - A proportionate ecological assessment should have been undertaken. This would have shown the unsuitability of this land.
  - This land is unsuitable for development at all
  - The Councils own historic reports show that this land is not suitable

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

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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. This site is not suitable for housebuilding

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Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="EN2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="309"/>				

4. Do you consider the Local Plan:

(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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- The site at Land north of B4109. Previous evidence indicated that the site had 'High sensitivity to housing development' in landscape and environmental terms.
- The land is part of a flood plain and would not be suitable for building of any kind.
- Allocations proposed in the emerging Local Plan do not reflect the available evidence in terms of impacts on the landscape, particularly with site 309

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The potential landscape and environmental impacts mean that Land north of B4109 should be removed from the plan as a proposed allocation. Suitable alternative sites should be considered.

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