

**Rugby Borough Local Plan (2025 – 2042)
Proposed Submission Version (Regulation 19)**

Land at Coventry Road, Wolvey

March 2026

Turley

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Our reference

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1. Introduction

- 1.1 These representations have been prepared on behalf of Rosconn Group in response to the Rugby Borough Local Plan (2025 – 2042) Proposed Submission Version (Regulation 19) consultation. They seek to follow the structure of the Proposed Submission Version Plan and respond to the supporting evidence base documents, where relevant.
- 1.2 Rosconn Group are working collaboratively with the landowners to promote Land at Coventry Road, Wolvey (the 'site') for residential development. Part of the site is identified as draft allocation **Site ID: 358** (Land at Coventry Road, Wolvey) in the Proposed Submission Version (Regulation 19) Plan. A wider site area was previously identified as a draft allocation for up to 500 dwellings (**Site ID: 96** - Land at Coventry Road, Wolvey) in the Preferred Options (Regulation 18) Plan.
- 1.3 The following supporting documents are appended to these representations:
- **Appendix 1** – Site Location Plan
 - **Appendix 2** - Concept Masterplan
 - **Appendix 3** – Landscape and Green Belt Report
 - **Appendix 4** – Wolvey Parish Council Minutes – January 2026
- 1.4 Rosconn Group **support in principle** the allocation of **Site ID: 358** in the emerging Local Plan and welcome the Council's recognition of its suitability for development. Further comments are provided throughout these representations on the extent of the allocation and the amount of development it is allocated for.
- Rosconn Group**
- 1.5 Rosconn Group are a land promotion company who seek to bring forward high quality schemes in collaboration with stakeholders and provide investment to local communities.
- 1.6 It is important to recognise that both land promoters and house builders play an important role in the delivery of new homes across the country. There is often a misconception that sites being promoted through a Local Plan by a land promoter would be delivered at a slower rate than those being promoted by a house builder. The evidence demonstrates that this misconception is incorrect. The structure of Promotion Agreements incentivises all parties to deliver new homes as quickly as possible, indeed Rosconn have a proven track record across England of the speedy delivery of new homes following receipt of outline planning permission.
- 1.7 Rosconn Group welcomes the opportunity to comment on the Proposed Submission Version Plan and look forward to engaging with the Council further in respect of the delivery of the site.

2. Land at Coventry Road, Wolvey

The Site

- 2.1 The Site is shown outlined in red on the Site Location Plan at **Appendix 1**. The site extends to approximately 8.66ha and is comprised of agricultural fields. The site is located to the south of Wolvey and is located on either side of Coventry Road, which separates the site into two parcels. To the north of the site is existing residential development, with Wolvey village centre beyond this. Agricultural fields border the eastern and southern boundaries of the site. To the west of the site is Wolvey playing fields and Hollick Way car park.
- 2.2 Access to the site is currently off Coventry Road which provides wider connections to the A5 and M69. In terms of train stations, Hinckley Train Station is located approximately 6.6km to the north of the site and provides connections to Leicester, Birmingham, Cambridge, Gloucester, and Stansted Airport. Wolvey Square bus stop is located approximately 0.3km to the north of the site and provides frequent services to Nuneaton, Rugby, Hinckley, Newbold, and the surrounding locality.
- 2.3 Public Right of Way ('PRoW') '315 R23/2' runs through the centre of the parcel to the east of Coventry Road in a north west to south east direction. As part of the proposals, the opportunities will be taken to connect and improve this PRoW to further enhance pedestrian and cycle connectivity from the site to existing facilities and services in the area.
- 2.4 The entirety of the site is located within Flood Zone 1. In terms of surface water, there is a small area at risk in the parcel to the west of Coventry Road. As part of the development proposals, surface water flows from the site will be attenuated and SuDS drainage features will be incorporated into the site layout.
- 2.5 There are no designated heritage assets located within or adjacent to the site. The site is also free from any formal ecological designations.

The Development Opportunity

- 2.6 The development proposals (**Appendix 2**) at Land at Coventry Road, Wolvey, seek to provide a landscape-led residential development, with public open space and play areas.
- 2.7 The supporting Concept Plan (**Appendix 2**) further illustrates the development proposals and the opportunity the site presents to deliver the following benefits:
 - The delivery of residential dwellings (potential capacity of up to 210 dwellings) in a range of housing types and tenures to suite all local needs;
 - The provision of affordable housing;
 - Incorporation of a responsive design that reflects local distinctiveness and site context;

- Development parcels nestled within high quality open space;
- Primary and secondary movement routes that ensure connectivity throughout the development, including the delivery of new and enhanced pedestrian and cycle connections through the site to the surrounding area;
- The retention and enhancement of PRow '315 R23/2';
- The retention and enhancement of existing soft landscape features where possible to enhance biodiversity and maintain green infrastructure within the site;
- Large portions of accessible public open space;
- Play areas for children;
- The delivery of a Biodiversity Net Gain; and
- The provision of SuDS and drainage infrastructure to help reduce surface water flood risk onsite and in the locality.

2.8 As demonstrated within these representations and previous submissions to the Council, it is considered that the site has no known constraints within the development area which cannot be suitably mitigated.

3. Representations to Proposed Submission Version (2025 – 2042) (Regulation 19) Plan

Draft Policy S1 – Settlement Hierarchy

- 3.1 Draft Policy S1 (Settlement Hierarchy) sets out the hierarchy for where new development will be focused within Rugby. Rugby town is identified as the principal urban area for development within the Borough. Wolvey is identified after Rugby town as a main rural settlement. The main rural settlements will accommodate development allocated through the Plan and Neighbourhood Plans.
- 3.2 Whilst the recognition of Wolvey as a main rural settlement is **supported**, it is noted that the Regulation 19 Plan only proposes to deliver 210 dwellings at Wolvey during the Plan period. The focus for growth will be concentrated in the Rugby Urban Area and expansion areas at Houlton, South West Rugby, and Eden Park.
- 3.3 It is apparent that Rugby Borough have a history for failing to meet their housing needs. This is evidenced by the Council’s current housing land supply position of 4.16 years¹. Given the Council have previously sought to concentrate 75% of development in the Rugby Urban Area and expansion areas (Houlton, South West Rugby, and Eden Park) as part of their spatial strategy in the Development Plan, it is evident that this approach is failing to deliver the housing needed for the Borough. The Council should therefore seek to concentrate and increase growth in other areas of the Borough, such as the main rural settlement of Wolvey, that are sustainable and make the most efficient use of land. This will ensure that there is diversity in sites across the Borough and a range of housing types and tenures can be delivered to meet identified needs.
- 3.4 It is therefore considered that the Council’s proposed approach to meeting housing needs in accordance with their settlement hierarchy is **not sound** and **has not been positively prepared**.
- 3.5 Further comments on the Council’s proposed spatial strategy and meeting housing needs is detailed below at Draft Policy S2 (Strategy for Homes).

Draft Policy S2 – Strategy for Homes

- 3.6 Draft Policy S2 (Strategy for Homes) sets out the Council’s approach to meeting housing needs during the Plan period (2025 – 2042). A total of 11,729 new homes are to be delivered in the following locations during the period 2025 – 2042 (636 dwellings per annum):

Table 3.1: Locations of new homes to be delivered from 2025 to 2042

Source	Number of homes 2025-2042
South West Rugby S8 & S9	3,505

¹ Five Year Housing Land Supply Position Statement 2025 - 2030

Source	Number of homes 2025-2042
Houlton remainder deliverable by 2042	3,060
Eden Park, Rugby	602
Other allocations under Local Plan 2011 - 2031	205
Other sites with planning permission	621
Allocations under Policy S6	2,886
Small site windfalls (fewer than 5 homes)	850
Total:	11,729

- 3.7 A supply buffer of 8.5% has been included as part of the above to increase the Council's potential of achieving a five year housing land supply ('5YHLS').
- 3.8 In the context of housing needs, it should be stressed that local housing need is not the same as the housing requirement to be set out in the Local Plan. The Council should therefore consider whether it is appropriate to set a higher housing requirement in line with paragraph 67 of the National Planning Policy Framework ('NPPF'). This includes the consideration of unmet housing needs from neighbouring authorities and delivering additional development to meet prevailing affordable housing need. Notably, the Plan is silent on the Council's commitment to deliver 2,800 homes to meet part of Coventry's unmet needs up to 2031 within their adopted Local Plan. Given that the new Plan period has a 'cross-over' with the adopted Local Plan, there should be consideration as to whether these 2,800 homes needs to be carried forward into the new Plan. Whilst the Sustainability Appraisal ('SA') (December 2025) at paragraph 5.2.8 states that this unmet need is an ongoing consideration in the adopted Local Plan, the fact that the Council do not have a 5YHLS demonstrates that the contribution to this unmet need has not been delivered.
- 3.9 The Council's 5YHLS position is currently being tested through an Appeal against the Council's decision to refuse planning permission for the redevelopment of the former football pitch and tennis courts associated to deliver 115 dwellings, accesses, landscaping, parking, drainage features and associated works. This is a proposed allocation site, identified to deliver 60 homes during the plan period. The Appellant's position is that the Council can only demonstrate a 2.04 years supply of housing. It is understood that that the appeal decision is due to be issued on 17 March 2026, should the Inspector provide any comments on the Council's 5YHLS, these must be taken into account prior to the Plan being submitted for examination.
- 3.10 The Council are proposing to deliver 636 dwellings per annum during the Plan period, as per the Standard Method requirements. However, as per Planning Practice Guidance ('PPG')², the Standard Method for calculating local housing need provides a minimum

² Paragraph ID:68-001-20241212

number of homes and should be used as the **starting point** when preparing the housing requirements in Local Plans.

- 3.11 To enable the housing needs for the whole Plan period to be met, it is essential that sufficient headroom is provided within the supply. As noted above, Rugby Borough make provision for a supply buffer of 8.5%. However, the overall housing figures set out in emerging Local Plan have reduced from the Preferred Options Plan (Regulation 18) to the Proposed Submission Version (Regulation 19). The Preferred Options Plan proposed a total of 14,134 dwellings during the period 2024 – 2045, in comparison to the figure of 11,729 dwellings during the period 2025 – 2042³.
- 3.12 The Development Needs Topic Paper (December 2025) informs at paragraph 2.14 that logically the buffer would be higher where the sites in the Plan are subject to more delivery risk. This would be the case, for example, for very large sites (i.e. Rugby Urban Area allocations) with long lead times and complex infrastructure requirements, or where there are viability concerns. This is particularly crucial in respect of affordable housing and the need for the Council to allocate further sites to increase the number of affordable homes delivered. As mentioned throughout these representations, the Rugby Urban Area strategic allocations (Houlton, South West Rugby, and Eden Park) have historically faced delivery challenges, as well as viability challenges, which in turn has limited the provision of affordable housing in these locations (e.g. Houlton is delivering zero affordable housing). The supply buffer of 8.5% should therefore be significantly increased in light of this.
- 3.13 Whilst it is acknowledged that the Council's Plan period has reduced by 4 years, hence why the overall dwelling figure has reduced, it is considered that the Council's approach to calculating its overall requirement is incorrect, principally due to the conflation between housing need and housing requirement. The affordable housing policies within the Plan are underpinned by the Updated Housing Needs Evidence (September 2025), which identifies a need for 474 net affordable homes per annum over the 18 year period from 2025 to 2043, which is a year longer than the current emerging Local Plan period.

Approach to delivering affordable homes

- 3.14 When this is viewed in the context of the fact that the Plan is seeking to deliver just 690 homes per annum across all tenures, it is evident that the identified affordable housing need alone represents around 69% of the total annual housing requirement. This clearly demonstrates that the proposed housing requirement is insufficient to realistically address the scale of affordable housing need identified in the Council's own evidence base. As such, the Plan risks embedding a structural shortfall in affordable housing delivery from the outset, contrary to national policy which requires Plans to be positively prepared and responsive to identified housing needs.
- 3.15 The position is even more concerning when these figures are considered alongside the application of Draft Policy H2. Even if it is generously assumed that all sources of supply identified under Draft Policy S2 were required to provide 30% onsite affordable housing, on the basis that they are located outside the Rugby Urban Area, the proposed strategy would deliver only around 207 gross affordable homes per annum.

³ Page 13 of the Proposed Submission Local Plan

This represents less than 50% of the identified affordable housing need. In practice, delivery will be substantially lower for a number of reasons:

- A significant proportion of the new housing supply is located within the Rugby Urban Area, where Draft Policy H2 requires only 20% onsite affordable housing provision;
- Draft Policy H2 does not require Build to Rent nor specialist older persons' accommodation proposals to deliver onsite affordable housing;
- A number of sites included within the supply already benefit from planning permission with reduced affordable housing provision on viability grounds. For example, the two remaining phases at Eden Park provide only 10% and 5.48% affordable housing respectively. Further, Houlton is not delivering any affordable housing. This is further evidence in paragraph 2.3.6 of the SA (December 2025);
- It is also likely that some additional sites will seek reductions to policy compliant affordable housing provision on viability grounds during the lifetime of the Plan, further reducing delivery;
- No affordable housing will be secured from the small sites allowance of 850 dwellings; and
- The SA highlights that the LHN cannot meet the Affordable Housing Need in full and that national planning policy provides a mechanism to increase the overall requirement in a plan to deliver affordable housing (SA paragraph 5.2.10).

3.16 It is also important to recognise that gross affordable housing delivery from these sites will be further eroded through losses from the existing stock, including demolitions and Right to Buy sales. MHCLG data shows that since 2011, which marks the start of the current Local Plan period, a total of 355 affordable homes have been lost through Right to Buy, equivalent to an average of around 25 homes per annum. As a result, the already limited level of gross affordable housing delivery anticipated under the emerging Local Plan will translate into an even lower level of net additions to affordable housing stock, further widening the gap between delivery and the scale of identified need.

3.17 In light of the above, it is clear that the scale of housing supply proposed by the Plan is insufficient to respond to the level of affordable housing need identified. Even under optimistic assumptions the strategy would deliver only a fraction of the affordable homes required, and in practice delivery will be lower once reduced policy requirements, viability negotiations and stock losses are taken into account. This is irrefutable evidence that the Plan should identify additional sites and opportunities for residential development in order to increase overall housing delivery and thereby improve the level of affordable housing provision that can realistically be secured. Such an approach would be consistent with the NPPF requirement for Plans to be positively prepared and to seek to meet identified housing needs, as well as with the Government's stated ambition to deliver the largest increase in social and affordable housing in a generation.

Approach to directing growth to Rugby Urban Area

- 3.18 Further to the above, Rosconn Group also raise concerns in respect of the Council's approach to concentrating 75% of growth within Rugby Urban Area and the proposed expansion sites.
- 3.19 Historically, Rugby Borough has experienced issues in being able to maintain a deliverable supply of housing land, as required by national policy. This is noted in the Inspector's Report of 2019 which considered the Development Strategy within the current Local Plan. At paragraphs 61-62, the Inspector notes that the approach of allocating sites away from the Rugby Urban Area was justified on the basis of broadening the housing supply, whilst also assisting in sustaining rural communities and their services. This was within the context of the fact that at that time, there had been an overreliance on Rugby town where up to 90% of housing development had been focused – since 2011, this distribution so heavily focused on the town meant that it had not been able to deliver housing at the rate of the Core Strategy (540 dpa), or maintain a deliverable 5 Year Housing Land Supply.
- 3.20 As set out above, due to viability issues, many of the sites with the Rugby Urban Area (which have been carried forward from the adopted Local Plan) have delivered very few affordable homes to date and are set to continue this through to completion.
- 3.21 The SA concluded that *"the strategic case for formally exploring growth scenarios that would involve a housing requirement set above LHN is overall not strong"* (SA paragraph 5.2.18) despite the fact that LHN could not accommodate the full affordable housing need. It did however consider it prudent to consider potential growth scenarios. The issue with the 8 potential growth scenarios is that the additional housing numbers were focussed in the Rugby area (including Houlton and Newton) and Lodge Farm (see table 5.2 of the SA). Whilst it would be unreasonable to expect that all potential scenarios are considered within the SA, it would be reasonable to expect that those scenarios were based on a number of different growth strategies – rather than focussing on a select area which has a history of under delivery. On this basis, it is considered that the **SA is not sound**.
- 3.22 Continuing to direct the majority of growth to the Rugby Urban Areas fails to provide a diverse range of housing sites, fails to deliver much needed affordable housing and fails to deliver much needed market housing at the pace that is required given the existing shortfall in housing supply.

Overall conclusions to Draft Policy S2 – Strategy for Homes

- 3.23 It is therefore considered that there is a need to diversify housing sites within the Borough to supplement the primary source around Rugby. This will provide market diversification and help with deliverability in the Borough. There is also a need for Rugby Borough to plan for a higher level of housing growth than the minimum local housing needs as calculated using the Standard Method. This will allow ongoing flexibility to ensure local and unmet housing needs can be met in full during the Plan period. Rosconn Group consider that the Council should further review the housing figures proposed within the Local Plan and the supporting evidence base. Rosconn Group therefore **do not support** the policy as currently drafted and do not consider that the policy as drafted has been positively prepared.

Draft Policy S6 – Residential Allocations

3.24 Draft Policy S6 (Residential Allocations) sets out the proposed development site allocations in the Proposed Submission Version Plan. Rugby Borough propose to allocate the following sites in Wolvey:

- Site ID: 358 – Land at Coventry Road, Wolvey – 60 dwellings
- Site ID: 309 – Land North of B4109, Wolvey – 150 dwellings

3.25 As stated earlier on within these representations, Rosconn Group are working collaboratively with the landowners to promote the wider land opportunity at Land at Coventry Road, Wolvey. Part of Rosconn Groups promotion site is included as draft allocation Land at Coventry Road, Wolvey (Site ID: 358). Whilst Rosconn Group consider that the wider land promotion shown at **Appendix 1** should be included as part of the draft allocation at Land at Coventry Road, it is noted that part of the site which forms draft allocation Site ID 358 is required to provide the following (as set out at: Proposed Submission Plan Annex: Development Site Allocations – Residential Allocations Wolvey):

Table 3.2: Proposed Site ID 358 Allocation Requirements v Rosconn Group Proposals

Site ID: 358 Allocation Requirements	Rosconn Groups Proposals
Active travel connection to Fern Hill Way	The development proposals make provision for a pedestrian / cycle connection from the site to Fern Hill Way
Built frontage to Coventry Road	The development proposals provide for built frontage along Coventry Road, alongside green infrastructure, to ensure that a transitional gateway is provided from the countryside into the village
Consideration of views towards the southern edge of the site from Coventry Road on the approach to Wolvey. Landscaped edge on the southern site boundary to reinforce the Green Belt edge	The development proposals have had regard to views towards the southern edge of the site from Coventry Road on the approach to Wolvey. The site provides a strong and defensible landscape buffer to the south and along parts of Coventry Road to ensure that the approach into Wolvey is transitional. Regard has also been had to PRoW '315 R23/2' in the eastern site parcel and the views from here. The PRoW is to be retained within a landscaped area that connects with the site's landscaped southern edge

Site ID: 358 Allocation Requirements	Rosconn Groups Proposals
Outward facing built frontage to southern edge and consideration of views toward this edge from Coventry Road	Whilst these are matters for detailed Reserved Matters, the development proposals will aim to include outward facing built frontage to the southern edge of the site and to Coventry Road
Retention of hedgerow and mature trees on Coventry Road	The development proposals seek to retain all hedgerows and mature trees on Coventry Road, whilst further enhancing planting along Coventry Road where suitable
Contributions to improved public transport provision	Rosconn Group will enter into discussions on the need for public transport contributions as part of a future planning application submission and engagement with the Council and local highways authority
Creation of a pedestrian and cycling link to Fern Hill Way	As noted above, the development proposals make provision for a pedestrian / cycle connection from the site to Fern Hill Way
If possible, create direct pedestrian access from the site to Wolvey Playing Field	The opportunity to create a direct pedestrian access from the site to Wolvey Playing Field will be explored as part of a future planning application submission

- 3.26 Rosconn Group support the principle of directing growth to the south of Wolvey at Land at Coventry Road. However, they object to the overall reduction of the draft allocation (Site ID: 358) given that the evidence base continues to support delivering a larger number of dwellings in this location. Rosconn Group consider that the draft allocation of the site should be increased, as per the area at **Appendix 1**, to make the most efficient use of land and to provide a strong and defensible boundary to Wolvey.
- 3.27 As part of the Council's spatial strategy for Rugby, it is proposed that 75% of new homes will be accommodated in the urban area of Rugby. Whilst it is acknowledged that the Council propose to concentrate growth within the Rugby Urban Area, it is clear from the Council's housing land supply position that this strategy has not proved successful. The Council are essentially preventing market diversification across the Borough by concentrating growth within the urban area. Should any of the sites within the Rugby Urban Area (Houlton, South West Rugby, and Eden Park) fail to come forward or become delayed, then deliverability within the Borough will further worsen and the Council's housing situation will be exacerbated. This also raises concerns in respect of affordable housing given the Rugby Urban Area is only required to provide 20% affordable housing. This does not truly reflect the level of affordable homes being delivered on these sites (see paragraph 3.15 above) and is significantly lower than the requirement in comparison to the few allocated Green Belt sites which are required to provide 40% affordable housing.

- 3.28 Following the above, the site presents an opportunity to accommodate further growth that is sustainably located and can help the Council meet identified housing needs. The site is supported by the local community and various discussions have taken place with Wolvey Parish Council, who have confirmed their support for the expansion of the site in comparison to the other Wolvey allocation at Land North of B4109, Wolvey (Site ID: 309) for 150 homes. **Appendix 4** details the January 2026 Wolvey Parish Council meeting discussions. These discussions confirm that only 2 of the 110 members of the local community present were opposed to the expansion of Land at Coventry Road, with there being a clear preference for the expansion of the site in comparison to retaining the draft allocation at Land North of B4109, Wolvey for 150 dwellings.
- 3.29 This approach is supported by the Council's evidence base. The SA, at paragraph 5.4.91, highlights the significant concerns that have been raised by the Wildlife Trust with regards to the draft allocation at Land North of B4109, Wolvey (Site ID: 309) and that the concept masterplan submitted to date shows very little land for green / blue infrastructure along the boundary with the river corridor.
- 3.30 Rosconn Group have previously submitted supporting technical documents in respect of transport, ecology, landscape, and Green Belt for the larger 500 home allocation that was proposed in the previous iteration of the Plan. Along with the technical evidence prepared to date by the Council which also supported a larger scale of development in this location.
- 3.31 Following the publication of the Regulation 19 Plan, and the significant reduction in site area, Rosconn Group and their technical team have reviewed their proposals for a smaller parcel of land which could up to 210 dwellings (**Appendix 2**). The reduced scale of development has much reduced any identified impacts in all respects – albeit the Council considered the impacts of the 500 unit draft allocation were acceptable in the previous Preferred Options Draft Plan (Regulation 18). Rosconn Group and their technical team are updating the technical documents to address the reduced scale of the site and will share these with the Council in due course.
- 3.32 The Stage 2 Site Options Assessment (December 2025) has had regard to the Housing and Economic Land Availability Assessment ('HELAA') and details the Council's analysis of potential suitable options for potential site allocations.
- 3.33 As referenced within our introduction, the previous Preferred Options version of the Draft Plan proposed to allocate a much larger site for up to 500 dwellings, assessed as **Site ID: 96** (Land at Coventry Road, Wolvey), with a smaller part of the site (**Site ID: 358** - Land at Coventry Road, Wolvey) now being identified as a draft allocation in the Proposed Submission Version Plan for circa 60 dwellings.
- 3.34 Whilst there were no overriding technical concerns with Site ID: 96, the Council considered that the overall scale of development in Wolvey (710 dwellings) was disproportionate to the settlement size, with now only 210 dwellings being proposed within the village as part of the Regulation 19 Plan.
- 3.35 Whilst this is acknowledged by Rosconn Group, it is considered that the evidence supports an enlargement of the proposed allocation (Site ID: 358), as detailed at

Appendix 1, in order to increase the delivery of market and affordable housing at a site that is suitable, sustainable, and well related to the village.

3.36 **Table 3.3** below provides an overview of the Stage 2 Site Options Assessment for Site ID: 309, 358 and 96. This table demonstrates that the Council's evidence base would support the enlargement of the proposed allocation at Site ID 358. Further, this enlarged site could come forward instead of Site ID: 309, which is Wolvey Parish Council's preference.

Topic Area	309: Land North of the B4109, Wolvey	Site 358: Land at Coventry Road Wolvey	Site 96: Land at Coventry Road, Wolvey
Transport	<p>The site is accessed from Bulkington Road.</p> <p>The site has an average connectivity score of 25 with a maximum of 27, placing it within Band D relative to the borough as a whole.</p> <p>National Highways did not provide any comments on this site.</p> <p>In terms of the capacity of the road network, an assessment of junctions within a nominated distance of the site was undertaken to determine congestion levels at peak and non-peak times. The roads surrounding the site were assigned a congestion rating of category 4, with 1 being the most congested and 6 being less congested.</p> <p>The distance to the nearest bus stop from the site is 150m.</p> <p>The Public Transport Accessibility Level (PTAL) is a measure of the accessibility of a location to the public transport network, taking into account walk access time and service availability. The site has a PTAL score of 1a for both AM and PM which would not be improved by proposed and recent public transport improvements. PTAL is measured on a 1-6 scale, with 1 being the least accessible and 6 being the most accessible. Using other data, including an assessment of walking and cycling, and locations from the site accessible within a 1 hour bus journey, the overall accessibility of the site is ranked 78 of the 125 sites considered as part of Rugby's current site assessment. This measures accessibility at a middle layer super output area level, rather than site specific accessibility. So it only provides information on accessibility for the part of the borough in which the site lies.</p>	<p>The site is accessed from the B4109/B4065.</p> <p>The site (as 96) has an average connectivity score of 24 with a maximum of 27, placing it within Band D relative to the borough as a whole.</p> <p>National Highways did not provide any comments on this site. In terms of the capacity of the road network, an assessment of junctions within a nominated distance of the site was undertaken to determine congestion levels at peak and non-peak times. The roads surrounding the site were assigned a congestion rating of category 4, with 1 being the most congested and 6 being less congested.</p> <p>The distance to the nearest bus stop from the site is 58m.</p> <p>The Public Transport Accessibility Level (PTAL) is a measure of the accessibility of a location to the public transport network, taking into account walk access time and service availability. The site has a PTAL score of 1a for both AM and PM which would not be improved by proposed and recent public transport improvements. PTAL is measured on a 1-6 scale, with 1 being the least accessible and 6 being the most accessible. Using other data, including an assessment of walking and cycling, and locations from the site accessible within a 1 hour bus journey, the overall accessibility of the site is ranked 75 of the 125 sites considered as part of Rugby's current site assessment. This measures accessibility at a middle layer super output area level, rather than site specific accessibility. So it only provides information on accessibility for the part of the borough in which the site lies.</p>	<p>The site is accessed from the B4109/B4065.</p> <p>The site has an average connectivity score of 24 with a maximum of 27, placing it within Band D relative to the borough as a whole.</p> <p>National Highways did not provide any comments on this site. In terms of the capacity of the road network, an assessment of junctions within a nominated distance of the site was undertaken to determine congestion levels at peak and non-peak times. The roads surrounding the site were assigned a congestion rating of category 4, with 1 being the most congested and 6 being less congested.</p> <p>The distance to the nearest bus stop from the site is 58m.</p> <p>The Public Transport Accessibility Level (PTAL) is a measure of the accessibility of a location to the public transport network, taking into account walk access time and service availability. The site has a PTAL score of 1a for both AM and PM which would not be improved by proposed and recent public transport improvements. PTAL is measured on a 1-6 scale, with 1 being the least accessible and 6 being the most accessible.</p> <p>Using other data, including an assessment of walking and cycling, and locations from the site accessible within a 1 hour bus journey, the overall accessibility of the site is ranked 75 of the 125 sites considered as part of Rugby's current site assessment. This measures accessibility at a middle layer super output area level, rather than site specific accessibility. So it only provides information on accessibility for the part of the borough in which the site lies.</p>
Ecology	<p>An initial ecological assessment indicated that the site was not within an Impact Risk Zone of a Site of Special Scientific Interest, nor a Local Wildlife Site, and nor was it comprised of more than 20% medium to high distinctiveness habitat. The site was not further assessed for ecological constraints.</p>	<p>An initial ecological assessment indicated that the site was not within an Impact Risk Zone of a Site of Special Scientific Interest, nor a Local Wildlife Site, and nor was it comprised of more than 20% medium to high distinctiveness habitat. The site was not further assessed for ecological constraints.</p>	<p>An initial ecological assessment indicated that the site was not within an Impact Risk Zone of a Site of Special Scientific Interest, nor a Local Wildlife Site, and nor was it comprised of more than 20% medium to high distinctiveness habitat. The site was not further assessed for ecological constraints.</p>
Landscape	<p>The overall landscape sensitivity of the site is Medium/Low. A medium-sized site comprising four agricultural fields on the edge of Wolvey enclosed by hedgerows on all sides and a concentration of trees along the boundary with the River Anker</p>	<p>The overall landscape sensitivity of the site (as 96) is Medium/Low. The site is located to the south of Wolvey and comprises arable fields with the B4065 running through the centre. There are no known</p>	<p>The overall landscape sensitivity of the site is Medium/Low. The site is located to the south of Wolvey and comprises arable fields with the B4065 running through the centre. There are no known cultural heritage or historic features within the site or surrounding landscape. The site is likely</p>

	to the north. Limited sensitivities are likely to arise from its intervisibility with nearby dwellings, its natural value (particularly as a setting for the River Anker), and the recreational value of its PRoW.	cultural heritage or historic features within the site or surrounding landscape. The site is likely of recreational value to local residents due to the location of a PRoW within the site. Views into the site from the surrounding transport infrastructure are filtered. Note that this site was assessed jointly with site 318	of recreational value to local residents due to the location of a PRoW within the site. Views into the site from the surrounding transport infrastructure are filtered. Note that this site was assessed jointly with site 318
Heritage	There were no designated heritage assets identified within 50 metres of the site.	There were no designated heritage assets identified within 50 metres of the site.	There were no designated heritage assets identified within 50 metres of the site.
Other site constraints	The site is provisionally identified as Grey Belt, making a strong contribution to purpose C. Constraints for foul water drainage are assessed as Medium, constraints for surface water drainage are assessed as Low. The estimated primary pupil yield could be accommodated in the existing catchment; the site is in a catchment for a secondary school which is outside the borough. Water Cycle Study highlights potential water supply constraints pending upgrade to the Bramcote Wolvey Booster Station.	The site is provisionally identified as Grey Belt, making a strong contribution to purpose C. Constraints for foul water drainage are assessed as High, constraints for surface water drainage are assessed as Low.	The site is provisionally identified as Grey Belt, making a strong contribution to purpose C. Constraints for foul water drainage are assessed as High, constraints for surface water drainage are assessed as Low. The stage 2 Water Cycle Study highlights that “Wolvey is experiencing limitations in its water supply capacity. To accommodate future demand, infrastructure improvements are needed, including an upgrade to the Wolvey Booster Station and the installation of several kilometres of new mains.”. This creates a potential delay to delivery of further housing at Wolvey.
Opportunities Benefits	Residential and open space.	Residential	Residential
Outcome of further assessment:	Proposed site allocation	Proposed site allocation	Not progressed in this format
Reasoning	A medium-sized site comprising four agricultural fields on the edge of Wolvey. The surrounding road network has medium levels of congestion, accessibility by non-car modes is assessed as generally weak but the site is walkable to the services and facilities in Wolvey including the school opposite. The site is well-related to settlement edge with good connectivity. Site doesn't flag ecology or heritage constraints. The site is provisionally within the Grey Belt and landscape sensitivity is assessed as Medium/Low. In view of the site's good relationship to the village and absence of constraints, the site is a proposed allocation.	The site is located to the south of Wolvey. It is a smaller cut of site 96. The surrounding road network has a medium level of congestion, the overall MSOA-based accessibility of the site and connectivity score are relatively poor. However, the site is walkable to services and facilities in Wolvey. Neither heritage nor ecology sensitivities were identified, and landscape sensitivity is Medium/Low. The site is entirely within the Grey Belt. The site does not have the flood constraints of other Wolvey locations. Overall, the site is well related to the existing village and has low constraints. This smaller scale development is considered commensurate with the services available in the village.	The site is located to the south of Wolvey and comprises arable fields with the B4065 running through the centre. The surrounding road network has a medium level of congestion, the overall MSOA-based accessibility of the site and connectivity score are relatively poor. However, the site is walkable to services and facilities in Wolvey. Neither heritage nor ecology sensitivities were identified, and landscape sensitivity is Medium/Low. The site is provisionally within the Grey Belt. Overall, the site is well related to the existing village and has low constraints, but the scale of development was considered disproportionate to settlement size, and the site is not progressed in this format. A reduced scale site was allocated, please see site 358.

- 3.37 Further to the above assessment of sites 309, 358 and 96, **Appendix 3** provides a detailed assessment of sites 309 and 358 in respect of landscape and visual impact. Site ID: 358 is considered to have low sensitivity to landscape and visual capacity, in comparison to Site ID: 309 which is considered to have high sensitivity. The site (Site ID: 358) presents opportunities to create a more sensitive settlement edge that would be less imposing on the retained countryside and fundamentally, mitigation measures could be introduced that would offset the localised loss of the internal arable land. The localised change introduced here would not be fundamental or irreparable as would be the case with Site ID: 309.
- 3.38 Rosconn Group support in principle the draft allocation of Site ID: 358 but consider this should be increased to up to 210 dwellings, as shown at **Appendix 1** and **Appendix 2**. As demonstrated by the evidence submitted with Rosconn Group’s submission at the Regulation 18 stage to support the draft allocation for 500 dwellings, the wider site has no known constraints within the development area that cannot be mitigated. This is supported by the Rugby Borough Council’s own technical evidence base documents to inform their assessment of the site and its considerations as a draft allocation.
- 3.39 As illustrated at **Appendix 2**, the delivery of an enlarged allocation on the southern edge of the village would provide an opportunity to improve the existing stark urban edge at the southern entrance to the village by creating a softer and better defined edge at this transitional gateway between the countryside and Wolvey. This softer and continuous green edge would also secure a strong and defensible Green Belt boundary to the south and east of the site, helping contain and prevent any wider harm to the Green Belt.
- 3.40 Reflecting on the above, Rosconn Group **object** to the policy as drafted and consider that the policy as drafted is **not justified** as it does not reflect evidenced based needs. Whilst Rosconn Group support the principle of locating growth in this location, they consider the draft allocation it is **not justified** or based on **sound** evidence due to its significantly reduced scale. Rosconn Group therefore wish to see the draft allocation for Site ID: 358 extended to the area set out at **Appendix 1** and wish to comment further on the draft allocation through the Local Plan process.

Draft Policy CL1 – Net Zero Buildings

- 3.41 Draft Policy CL1 (Net Zero Buildings) informs that new buildings comprising one or more dwellings must be designed and built to be net zero carbon in operation.
- 3.42 To achieve the above, the policy provides further details on standards for residential developments to achieve. The supporting policy text at paragraph 2.1 references Part L of the Building Regulations and the minimum standards for the energy efficiency of buildings. Paragraph 2.1 also has regard to the Future Homes and Future Building Standards, with it being anticipated that these standards will not result in buildings which are net zero carbon.
- 3.43 Whilst it is acknowledged that the Council want to go “*further and faster*” to achieve net zero carbon development at the earliest opportunity, the Council should not require policy to go above and beyond the requirements set out in Building Regulations

and national standards. The policy as worded is too onerous and fails to have regard to viability and individual development proposals.

- 3.44 Given Draft Policy CL1 is seeking to go above and beyond Building Regulations and national standards, Rosconn Group **do not support** the policy and consider that it does not meet the necessary tests set out at paragraph 36 of the NPPF. The policy is **not sound or justified** and has the ability to cause delays to development and further exacerbate the Council's housing land supply.

Draft Policy EN2 – Landscape Protection

- 3.45 Draft Policy EN2 (Landscape Protection) sets out that development shall avoid significant adverse impacts on landscape character and significant adverse visual impacts.
- 3.46 Whilst Rosconn Group **agree in principle** to avoiding significant adverse impacts on landscape character and views, it is considered that the policy, as currently worded, does not include enough flexibility and has the potential to impact the delivery of development. The policy wording should therefore be **amended** from "*development shall avoid*" to "*development should seek to avoid*".

Draft Policy EN6 – Canopy Cover

- 3.47 Draft Policy EN6 (Canopy Cover) requires all major development to increase post-development canopy cover to at least 20% of the site area, unless such requirement is demonstrated to be incompatible with delivering Biodiversity Net Gain requirements onsite. Where the canopy cover of the site exceeds 20% before development, the proposal should ensure retention of at least the existing level of canopy cover.
- 3.48 Within the supporting text to the policy, the Council recognise that there may be sites for which achieving 20% canopy is not possible and in such circumstances, the Council may negotiate an alternative level of canopy cover. Whilst this justification in the supporting policy text is welcomed, Rosconn Group consider that the wording of the policy as currently drafted does not provide any flexibility. The requirement for 20% canopy cover is not a national requirement and the policy should therefore not be going above and beyond that set out at the national level. It is also considered that the evidence referenced within the supporting text is not sufficient and does not provide appropriate justification as to why the policy is seeking to go above and beyond national requirements.
- 3.49 Rosconn Group therefore **do not support** the policy as drafted and consider that it fails to meet the tests set out at paragraph 36 of the NPPF. To ensure that the policy is sound and justified, the wording of the policy should therefore be **amended** to "*shall seek to increase post-development canopy cover where possible*".

Draft Policy H1 – Housing Mix

- 3.50 Draft Policy H1 (Housing Mix) sets out that new housing developments shall contribute to meeting the housing needs of the Borough as identified in the Housing Needs Evidence (2025) and any other appropriate local evidence. This means new residential

development shall maintain, provide or contribute to a mix of housing tenures, types and sizes to support the creation of a mixed, balanced and inclusive community.

- 3.51 Rosconn Group have no specific comments to raise in respect of Draft Policy H1 or the above evidenced mix. Rosconn Group however, wish to emphasise that should the Council look to secure the delivery of a range of housing types and tenures across the Borough, they will need to look to other sites outside of the Rugby Urban Area / expansion area to ensure market diversification and deliverability.
- 3.52 The Council should therefore look to sustainable sites identified for draft allocation in the main rural settlements, such as the site at Wolvey, and look to increase the number of dwellings proposed (within reason) to ensure the most efficient use of land.

Draft Policy H2 – Affordable Housing

- 3.53 Criteria A of Draft Policy H2 (Affordable Housing) informs that developments of 10 or more dwellings (including conversions and subdivisions but excluding specialist older persons' accommodation) shall provide the following proportion of new homes as affordable homes:
- Within the Rugby Urban Area – 20%
 - Elsewhere in the Borough – 30%
 - On sites released from the Green Belt through this Plan or other Green Belt permissions – 40%
- 3.54 It is noted that the Plan does not clearly define the spatial extent of the Rugby Urban Area. The Policies Map does not appear to identify a boundary labelled “Rugby Urban Area”, nor is the area defined within the written policy framework or glossary. Given that this distinction directly determines the level of affordable housing to be secured from developments, the absence of a clearly defined boundary creates uncertainty as to how the policy should be applied in decision making. The Plan should therefore clearly identify the Rugby Urban Area boundary on the Policies Map and cross refer to this within the policy wording, ensuring the policy can be applied consistently and transparently by decision makers, applicants and other users of the Plan.
- 3.55 Criteria B prescribes a fixed tenure split of 70% Social Rent and 30% Shared Ownership. The proposed tenure split is unduly narrow and fails to reflect the full range of affordable housing tenures available, each of which serves a distinct role in meeting different types of housing need. Whilst it is recognised that the Council’s evidence identifies a significant need for socially rented homes, the evidence base also identifies a role for Affordable Rent as part of the affordable housing mix. The policy is also notably weak in relation to affordable home ownership, limiting provision solely to Shared Ownership and making no reference to other recognised affordable home ownership tenures set out in the NPPF, such as First Homes or other forms of discounted market housing. This approach appears to adopt an overly simplistic tenure split, rather than reflecting a proper understanding of the complexity of local housing needs and the distinct roles that different affordable housing tenures play in meeting those needs.

- 3.56 Criteria D, supported by paragraph 6.7, seeks an off-site financial contribution from Build to Rent schemes on the basis that “*Build to rent housing operates a different financial model to build to sell housing making on site delivery of s106 affordable housing challenging*”. Annex 2 of the NPPF expressly recognises Affordable Private Rent as the rental affordable housing product associated with Build to Rent development and confirms that such provision should normally be delivered onsite and managed by the Build to Rent landlord for the lifetime of the scheme. National policy therefore clearly anticipates that affordable housing can and should be delivered within Build to Rent schemes themselves, rather than being substituted with a financial contribution. The approach proposed under Draft Policy H2 is inconsistent with national policy and risks undermining the delivery of integrated affordable housing within Build to Rent developments.
- 3.57 With reference to the definitions of affordable housing, the emerging Local Plan Glossary both overcomplicates the issue whilst at the same time remaining deficient. The Glossary refers to Social Rent in isolation but does not use the NPPF definition of Social Rent, nor does it adopt the NPPF definition of Affordable Housing more generally. In addition, it makes no reference to Affordable Rent or Affordable Private Rent, both of which are recognised affordable housing tenures within national policy. This approach risks creating confusion and inconsistency with national policy. Affordable housing should instead be defined under a single definition which directly reflects the NPPF definition of Affordable Housing, with clear reference to the NPPF (or any subsequent iteration), ensuring that all recognised affordable housing tenures are appropriately captured.
- 3.58 It is also striking that the draft Regulation 19 Plan contains no monitoring framework for affordable housing delivery, despite the clear importance of this issue. This is particularly concerning given the likely significant shortfall in affordable housing delivery over the Plan period, as considered above. The absence of a defined target or delivery trajectory means there is no meaningful benchmark against which performance can be assessed. As a result, the implementation of the policy cannot be effectively monitored, and the Plan provides no mechanism for identifying under delivery or triggering corrective action should delivery fall short of expectations.
- 3.59 In this context it is important to note that Regulation 34(3) of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires local planning authorities to report, through their Authority Monitoring Reports, on the delivery of “net additional affordable dwellings” where this is specified in adopted policy. The absence of a clear monitoring framework, including a defined target or trajectory for affordable housing delivery, therefore risks undermining the ability of the Council to effectively monitor and report on the performance of the Plan in relation to affordable housing provision.
- 3.60 Taken together, these issues demonstrate that draft Policy H2 is not currently **effective or justified**. The policy lacks clarity in its spatial application, prescribes an unnecessarily rigid and incomplete tenure mix, and adopts an approach to Build to Rent which is inconsistent with national policy. In addition, the absence of a clear monitoring framework means there is no mechanism to assess whether the policy is successfully delivering affordable housing over the Plan period or to respond if delivery falls short.

Given the scale of affordable housing need identified in the Council's own evidence base, the Plan should be seeking to maximise delivery and provide a clear, flexible and policy compliant framework for securing affordable housing. As currently drafted, Draft Policy H2 does not achieve this and requires substantial revision.

- 3.61 It is therefore considered that Draft Policy H2 does not reflect the most recent guidance in respect of Green Belt and the Golden Rules, and Rosconn Group therefore **object** to the policy as currently drafted.

Draft Policy H6 – Specialist Housing

- 3.62 Draft Policy H6 (Specialist Housing) sets out that the Council will support the provision of housing to maximise the independence and choice for older people and those members of the community with specific housing needs. Part C of the policy notes that the housing allocation at 'Land at Coventry Road, Wolvey' shall provide serviced self-build and / or custom build plots as part of the development.
- 3.63 The Updated Housing Needs Evidence (September 2025) makes reference to the Rugby Borough Self and Custom Build Register (April 2025). The Register shows a total demand for 202 entries (between 2016 – 2024), with Rugby town named as the most popular area in terms of demand. The Register shows 1 entry interest for Wolvey.
- 3.64 Whilst the policy does not specify any % requirements in terms of self-build and custom plots at the site, it is considered that no caveat has been included within the policy to say this will be based on evidenced needs and reviewed on a site by site basis. Given there is only 1 entry interest for Wolvey, the policy should be worded more flexibly to ensure that development at the site is not restricted or delayed.
- 3.65 Rosconn Group consider that Draft Policy H6 is not justified or based on sound evidence. They therefore **object** to the policy as currently drafted.
- 3.66 Part C of the policy should be **amended** to read as "*residential developments shall provide serviced self-build and / or custom build plots as part of the development where there is evidence of unmet need within a specific location*".
- 3.67 Further to the above, no specific sites should be identified within the policy, or all allocations should have the same requirement to provide serviced self-build and / or custom build plots on their site. The evidence base does not support specifying only certain sites within this policy.

Draft Policy H7 – Housing Standards

- 3.68 Draft Policy H7 (Housing Standards) requires all new dwellings to meet the Nationally Described Space Standards ('NDSS'). All new dwellings shall meet the requirements for M4(2) Building Regulations technical standards and on developments of 10 or more dwellings, 3.5% of dwellings shall meet M4(3) Building Regulations technical standards.
- 3.69 Whilst Rosconn Group acknowledge the need to provide a range of housing mixes and tenures, it is considered that the policy as drafted provides no scope or flexibility and fails to have regard to viability / deliverability factors. The requirement for all homes to

meet M4(2) standards and 3.5% of homes to meet M4(3) standards goes beyond matters in relation to Building Regulations and may impact the Local Plan's ability to deliver both market and affordable housing where it is most needed.

- 3.70 Rosconn Group consider that Draft Policy H7 fails to accord with the tests set out at paragraph 36 of the NPPF and is **not justified**. To ensure the policy is sound, it should be **amended** to:

"B. All new dwellings should aim to meet the requirements for Category 2 – accessible and adaptable dwellings set out in Part M4(2) of Schedule 1 to the Building Regulations 2010 (as amended).

C. On developments of 10 or more homes, up to 3.5% of dwellings shall meet the requirements for Category 3 – wheelchair user dwellings set out in Part M4(3) of Schedule 1 to the Building Regulation 2010 (as amended)".

Draft Policy W2 – Open Space and Sports Provision

- 3.71 Draft Policy W2 (Open Space and Sports Provision) requires developments of 10 or more dwellings to meet specific standards.
- 3.72 Whilst Rosconn Group **broadly support** the principle and requirements of the policy, it is considered that in parts, the wording of the policy is too onerous and does not provide any flexibility. For example, should a development not provide all of the above open space typologies listed, but provide an excess of some typologies, due regard should be had to this by the Council.
- 3.73 Having regard to the above, part A of the policy should be **amended** to read *"residential development of 10 or more dwellings, should aim to, through onsite provision or contributions...".*

Draft Policy D5 – Sustainable Drainage

- 3.74 Draft Policy D5 (Sustainable Drainage) requires all developments that create a need for surface water drainage to include SuDS for the management of surface water run-off, unless proven to be inappropriate. Part B of the policy then sets out a requirement list for SuDS to comply with. Part C of the policy considers that infiltration SuDS are preferred, with part D advising that where infiltration is not possible, surface water should be discharged into a water course. Part E of the policy requires SuDS schemes to have a maintenance schedule, detailing maintenance boundaries, responsible parties, and arrangements to ensure management in perpetuity.
- 3.75 It is considered that the wording of the policy could be more flexible to ensure development is not restricted within the Borough. It is therefore suggested that the policy is **amended** to read at part B *"SuDS should aim to"* and part E *"SuDS schemes should aim to have a maintenance..."*.

Draft Policy I1 – Transport

- 3.76 Draft Policy I1 (Transport) requires development to be designed in accordance with the transport user hierarchy outlined in the Warwickshire Local Transport Plan, with the prioritisation of active travel. Part B of the policy outlines the transport requirements for new development to meet.
- 3.77 It is considered that the wording of the policy could be more flexible to make certain development is forthcoming. Part B of the policy should therefore be **amended** to “*development should aim...*”.

Draft Policy I4 – Infrastructure and Planning Obligations

- 3.78 Draft Policy I4 (Infrastructure and Planning Obligations) requires new developments that exceed the capacity of existing infrastructure to only be permitted where it can be demonstrated that there is a reliable mechanism in place to deliver the requisite infrastructure upgrades where required and to mitigate the impacts.
- 3.79 Rosconn Group agree with the supporting text set out at paragraph 9.10 in that it is essential that adequate infrastructure capacity exists to accommodate new development. However, whilst the policy provides a basis for requiring the delivery of necessary infrastructure upgrades, it fails to have regard to individual developments or their context. The policy as worded is too rigid and has not been caveated to say that sites will be considered on an individual basis.
- 3.80 Rosconn Group therefore **do not support** the policy as currently drafted and consider that it fails to accord with the tests set out at paragraph 36 of the NPPF. Rosconn Group request that the policy is amended to caveat that regard will be had to sites on an individual basis.

Proposed Submission Plan Appendix 1: Housing Trajectory

- 3.81 Appendix 1 of the Plan sets out the housing trajectory, which is based upon the following:
- South West Rugby (3900 homes – 3050 of which to be delivered in the plan period)
 - Eden Park (602 homes)
 - Houlton (4297 homes – 3030 to be delivered in the plan period)
 - Other 2019 Local Plan Allocations (205 homes)
 - Extant permissions as of 1 April 2025 (621 homes)
 - Windfalls for sites over 5 dwellings (850 homes, assuming 50 per year)
 - New Allocations (2886 homes)

- 3.82 There is currently an error on the trajectory. As drafted, it states that South West Rugby will deliver 3050 homes through the plan period, however when the individual annual delivery assumptions are added together they amount to 3505 homes. This is an important point because it alters the overall number of homes to be delivered in the Plan period – this could be either 11,274 home or 11,729. If South West Rugby is to deliver the lower figure, this reduces the Council’s buffer to just over 4% rather than 8.5%. It is requested that this matter be addressed prior to the submission of the Plan.
- 3.83 Notwithstanding the above, the Council are currently unable to demonstrate a deliverable 5YHLS. Their stated position as at 1 April 2025 is 4.19 years. The Trajectory as set out in Appendix 1 demonstrates that the Council will be unable to demonstrate a 5YHLS upon adoption of the Plan.
- 3.84 Whilst it is noted that the fact that a Plan is unable to demonstrate a 5YHLS upon adoption does not in itself result in the Plan being found unsound, as seen in the South Worcestershire Development Plan review and Uttlesford Local Plan, the Council do have other sites at their disposal to ensure this circumstance is avoided – sites such as Land at Coventry Road, Wolvey, which are capable of delivering more homes than stated in the Plan.
- 3.85 This point does highlight that the Council have a record of underdelivering the homes that are needed in the Borough. Of the 11,729 homes identified within Draft Policy S2 62% of those homes (7,342) are from sites identified within the current adopted Local Plan (2011 – 2031). A range of issues have resulted in these sites not being delivered at the rate set out in the adopted Local Plan trajectory. Rosconn Group have serious concerns regarding whether these sites can deliver the significant number of homes so early in the Plan period.
- 3.86 When allocating these sites within the adopted Local Plan, it was stated that these allocations would assist in meeting some of the 2,800 homes of Coventry’s unmet needs (up to 2031). The Regulation 19 Plan is silent on this point and the trajectory or proposed supply does not take this matter into account. Appeal decisions, such as Warwick, demonstrate how this matter should be addressed within the 5YHLS calculations.
- 3.87 It is important that this Plan correctly reflects the housing requirement and the supply position. Failing to do so will continue the Council’s trend of failing to meet the needs of those people living in the Borough. The evidence base supporting this Plan provides evidence that there are additional sites to help meet these needs.
- 3.88 The Council’s 5YHLS position is currently being tested through an Appeal against the Council’s decision to refuse planning permission for the redevelopment of the former football pitch and tennis courts associated to deliver 115 dwellings, accesses, landscaping, parking, drainage features and associated works. This is a proposed allocation site, identified to deliver 60 homes during the Plan period. The Appellant’s position is that the Council can only demonstrate a 2.04 years supply of housing. It is understood that the appeal decision is due to be issued on 17 March 2026, should the Inspector provide any comments on the Council’s 5YHLS, these must be taken into account prior to the Plan being submitted for examination.

Appendix 1: Site Location Plan

Revision Note: -

Notes:



Status: PLANNING

Client Name & Project Number:
Rosconn Group

Project title:
Coventry Road, Wolvey

Drawing title:
Site Location Plan

Scale: 1:2000 (A3)	Drawing no.: 02	Revision: -
Drawn by: SP / JMP	Checked by: JMP	Date: March 2026



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Appendix 2: Concept Masterplan

Revision Note:

Notes:



Key

-  Site Boundary
-  Primary Access
-  Public Rights of Way
-  Pedestrian / Cycle Access
-  Indicative Residential Area
-  Indicative Attenuation Basin
-  Indicative Play Spaces
-  Retained & Enhanced / New Vegetation



Status: Draft

Client Name & Project Number:
Rosconn Group

Project title:
Coventry Road, Wolvey

Drawing title:
Concept Plan

Scale: 1:2000 (A3)	Drawing no.: ii02	Revision: B
Drawn by: SP / JMP	Checked by: JMP	Date: March 2026



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Appendix 3: Landscape and Green Belt Report

Landscape & Visual Comparison Study

Rosconn Group – Land at Coventry Road, Wolvey

Aspect Ref: 8802.LVCS.002
13th March 2026

1 Introduction

1.1. Aspect Landscape Planning Ltd have been commissioned by Rosconn Group to provide a brief comparison study between two draft allocation sites and one omission site (that formed part of a wider draft allocation for 500 homes), located on the north western and southern edges of Wolvey. The sites in question are identified on the accompanying Viewpoint Location Plan (referred to as Site A and Site B). They are identified on Rugby Council’s online policy map and referenced as follows, **Site A:** ‘Land to the north of B4109, Wolvey,’ and **Site B:** ‘Land at Coventry Road, Wolvey.’ The outline for Site B, differs from the online policy map, covering a smaller area, noting that the land to the west of Coventry Road is draft allocated, whilst land to the east relates to the omission site noted above, but is included within Aspect’s comparison study as a speculative site, forming part of Site B.

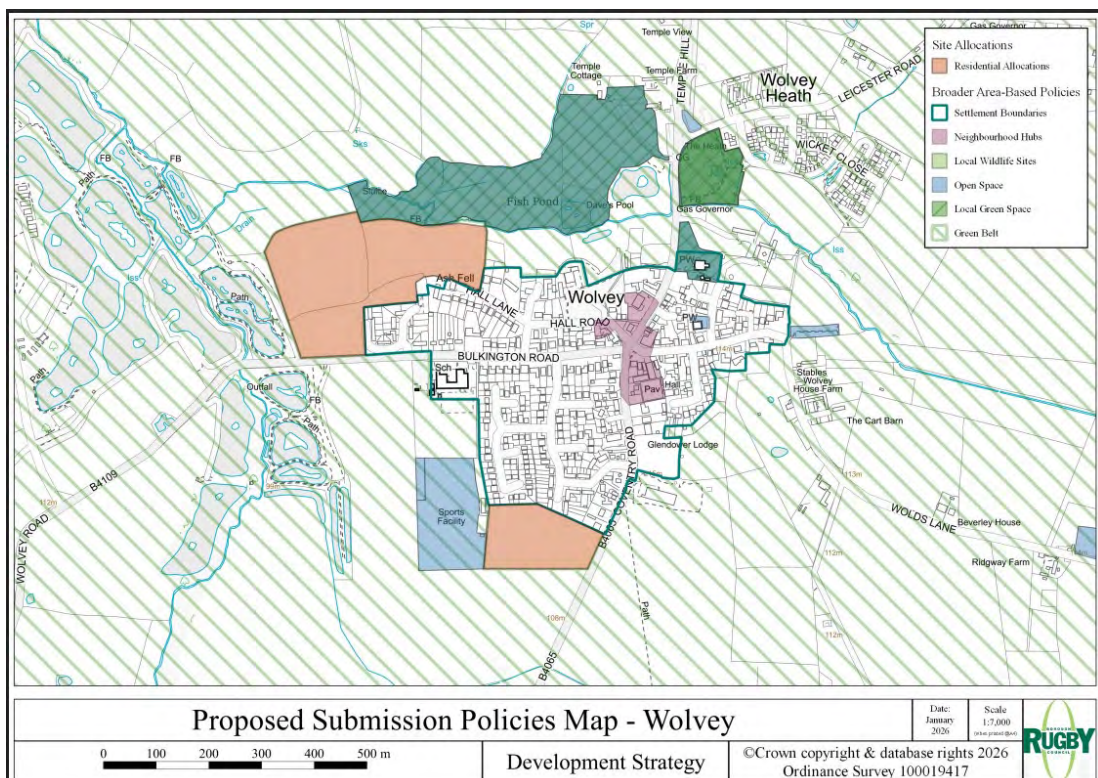


Figure 1: Draft Allocation Sites (identified in orange) within the emerging Rugby Local Plan.

- 1.2. This report contributes to Rosconn's representations in relation to Site B and Rugby Borough Council's Regulation 19 consultation.
- 1.3. A desktop study and subsequent on site field analysis has been undertaken by a Chartered Landscape Architect, to consider the sensitivity and potential capacity of both sites, in relation to residential development.
- 1.4. Key documents include the 'Stage 2 Site Options Assessment' (Dec 2025) (N.B. this study finds the same conclusions as set out within the recent 'Addendum for Strategic Site Options: Post Mitigation Assessments 9Dec 2025)) produced by Lepus Consulting, which forms part Rugby Council's evidence base and the 'Landscape Sensitivity Study' (August 2016) (LSS).

2 Overview of Published Sensitivity Assessments

Landscape Sensitivity Study (August 2016)

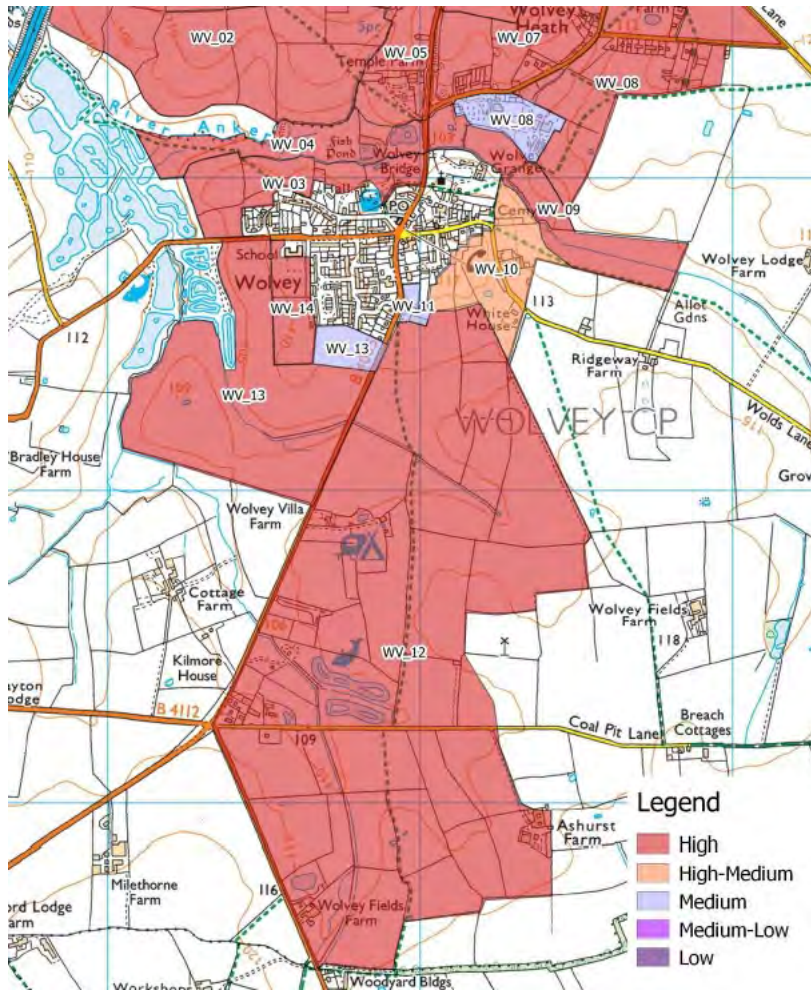


Figure 2: Draft Allocation Sites (identified in orange) within the emerging Local Plan.

- 2.1. The study parcels and identified sensitivities for the landscape surrounding Wolvey are highlighted on the above plan, provided as an excerpt from the LSS.
- 2.2. Site A, forms the western part of ‘WV03’ on the northern edge of Wolvey and was assessed as ‘high’ sensitivity to residential development and provides:

“This zone is a small scale, framed, pastoral landscape which rises up from the river corridor to the north. Rising ground towards the settlement edge forms a locally prominent skyline when viewed from the river corridor. Hedge lines are generally good, but becoming gappy in places. Tree cover is insignificant and of mixed age and is restricted to hedgerows only.”

Hedgerow management is mixed. There is one abrupt edge to the settlement, but the overall impression is of entering into a rural landscape which connects with the wider countryside.”

“Development is inappropriate in this zone because of the strong rural character, locally prominent skyline and connectivity to the wider farmland. The small scale, pastoral setting is closely associated with village settlements within and around the edge of the open plateau landscape. It also abuts a potential Local Wildlife Site to the west.”

“Therefore application site S16050 is inappropriate for development.”

2.3. Site B is assessed forming the northern most part of ‘WV13’ and forms the northern part of the much larger ‘WV12’ study parcel, which extends approximately 2.5km beyond the southern edge of Wolvey.

2.4. WV13 is assessed as being of medium sensitivity, within its northern extent, which relates to Site B, whilst the remainder of the study parcel is identified as high sensitivity to residential development. The assessment provides:

“This zone comprises large scale open arable farmland on rolling terrain to the south of the settlement between a fishery and school playing fields and is characterised by wide views. Roadside hedgerows vary in their condition from relatively intact along the Coventry Road with some scattered hedge trees to outgrown along the Bulkington Road. Tree cover tends to be restricted to occasional field trees, within the hedge lines and as screen planting to the fishery and its associated car park, creating an open landscape. There is a hard, modern settlement edge that is visible from the Coventry Road, along with the fencing and flood lights on the eastern edge of the sports ground.”

“The zone could accommodate some development in the north-eastern part, between the sports ground and the Coventry Road. Development should be designed sensitively, with a landscape buffer, to ensure it improves the existing hard settlement edge off the Coventry Road and strengthens and enhances the southern approach to the village. Development is inappropriate in the remainder of the zone due to the openness of views, its visibility and the need to retain a green buffer between the settlement edge and fishery (potential Local Wildlife Site).

Therefore application site S16064 could be partially developed in accordance with the above constraints. Development should not extend further than the southern end of the sports ground.

Application site S16013 is not suitable for development due to its openness, high visibility and detachment from the existing settlement.”

- 2.5. WV12 is assessed as being of high sensitivity to residential development. The assessment provides:

“This zone comprises medium to large scale open arable farmland on gently rolling terrain to the south of the settlement. While roadside hedgerows are relatively intact with scattered mature hedge trees the internal field pattern has been severely weakened with the loss of vegetation along the stream course and lost sections of hedgerow identifiable through surviving field trees. Further to the south is a camping and caravan park but this area was not surveyed as it lies a distance from the settlement edge.”

This zone forms part of the Dunsmore Open Plateau and, as such, sits on higher ground and is very open with wide views. Therefore this zone is inappropriate for development as it would be highly visible.

Stage 2 Site Options Assessment’ (Dec 2025)

- 2.6. Site 96: Land at Coventry Road, Wolvey.



Figure 3: Site 96: Land at Coventry Road, Wolvey.

2.9. Site 309: Land north of the B5109, Wolvey.



Figure 5: Site 358: Land at Coventry Road.

“The overall landscape sensitivity of the site is Medium/Low.

A medium-sized site comprising four agricultural fields on the edge of Wolvey enclosed by hedgerows on all sides and a concentration of trees along the boundary with the River Anker to the north. Limited sensitivities are likely to arise from its intervisibility with nearby dwellings, its natural value (particularly as a setting for the River Anker), and the recreational value of its PRoW.”

“The surrounding road network has medium levels of congestion, accessibility by non-car modes is assessed as generally weak but the site is walkable to the services and facilities in Wolvey including the school opposite. The site is well-related to settlement edge with good connectivity.

Site doesn’t flag ecology or heritage constraints. The site is provisionally within the Grey Belt and landscape sensitivity is assessed as Medium/Low.

In view of the site’s good relationship to the village and absence of constraints, the site is a proposed allocation.”



3 Aspect Overview of Landscape & Visual Sensitivity

3.1. Assessment of Landscape Value


3.2. The following analysis provides an overview of the inherent landscape value and qualities associated with Sites A and B, in accordance with GLVIA3 and the Landscape Institute's Technical Guidance Note 02/21 'Assessing landscape value outside national designations' (TGN 02/21). This is an initial evaluation which does not preclude or prejudice any future assessment work that would be undertaken as part of a more detailed qualitative landscape assessment, in support of a future planning application.

3.3. Table 1: Assessment of Landscape Value associated with Site's A & B.

Factor	Assessment of Value Site A	Assessment of Value Site B
<p>Natural Heritage</p> <p>Landscape with clear evidence of ecological, geological, geomorphological or physiographic interest which contribute positively to the landscape.</p>	<p>Site A's northern boundary is defined by the River Anker, comprising the water course, a mature riparian treeline and an area of wet meadow grassland / wetland. These features are considered to be of high ecological interest and natural diversity. This is echoed within the representations made by the 'Warwickshire Wildlife Trust,' which references the River Anker and associated areas of wetland habitat forming an important blue corridor. It also raises concerns to the potential impact on the Wolvey Wetlands Nature Reserve and Local Wildlife Site, as particularly sensitive ecological receptors.</p> <p>Boundary hedgerows are well defined and generally intact, with rough pasture defining the interior field parcels.</p> <p>Topography within Site A is strongly influenced by the River Anker, and forms part of a localised shallow valley, which extends to the north beyond the watercourse, resulting in a strong perceived relationship between the landform either side of the River Anker.</p>	<p>Site B's ecological interest is limited to the hedgerows and scattered hedgerow trees along its field boundaries. Internally, the fieldscape is in arable use and intensively managed, which has in itself led to some noticeable fragmentation within the hedgelines.</p> <p>Coventry Road and Wolds Lane are notable features which cut through Site B, bisecting the physical connectivity with the adjacent vegetation corridors.</p> <p>The Site is of limited topographical interest, being relatively level and typical of the wider setting.</p>
<p>Cultural Heritage</p> <p>Landscape with clear evidence of archaeological, historical or cultural interest which</p>	<p>The field pattern has a strong time depth value, remaining static since the 1830 map illustrated below.</p>	<p>Field merger around the southern edges of Wolvey has been extensive, resulting in a more recently typical large scale field pattern and loss of time depth within the historic landscape context.</p>

Factor	Assessment of Value Site A	Assessment of Value Site B
<p>contribute positively to the landscape.</p>	 <p>Added historic landscape interest is noted through the shaping of the field patterns by the watercourse and is of a notably smaller scale when compared to the wider agricultural landscape that surrounds Wolvey. Access through Site A from the edge of Wolvey towards the River Anker and beyond, has been established since at least the 1830's and is considered part of the historic fabric of the landscape setting to the north west of Wolvey.</p>	 <p>Access through Site B from the southern edge off Coventry Road, is evident within the historic mapping and is therefore also considered to comprise part of the historic fabric to the landscape setting of Wolvey.</p>
<p>Landscape Condition</p> <p>Landscape which is in a good physical state both with regard to individual elements and overall landscape structure.</p>	<p>Key features within Site A appear to be in good condition with the boundary hedgerows and riparian treeline being well defined and intact.</p>	<p>Key hedgerows along Coventry Road appear in good condition, however intactness within the internal boundary hedgerow structure is reduced due to the effects of the arable land use and reflects the pattern of field merger that is evident. The landscape condition within Site B is therefore reduced and would benefit from enhancements through more sensitive hedgerow management and added plant diversity alongside these features.</p>
<p>Associations</p> <p>Landscape which is connected with notable people, events and the arts.</p>	<p>Unknown.</p>	<p>Unknown.</p>
<p>Distinctiveness</p> <p>Landscape that has a strong sense of identity.</p>	<p>Site A is considered to be a strongly distinctive landscape, forming part of a shallow valley either side of the River Anker. Internal land use comprises rough pasture and areas of wet meadow / wetland that are unique to this part of the settlement. The riparian treeline is a notable distinct feature, observed from within Site A and from localised PRow routes within the opposing valley side to the north.</p>	<p>A key feature of Site B, is the Coventry Road approach and hedgerows which align it, which is synonymous with the approach into the southern edge of Wolvey.</p> <p>However, the townscape edge to the north is not considered to be distinctive, comprising late 20th Century development.</p>

Factor	Assessment of Value Site A	Assessment of Value Site B
		<p>Site B displays typical characteristics of the LT Open Plateau, comprising a relatively level topography, large scale arable fields where some hedgerow fragmentation weakens field pattern definition, resulting in a homogenous character.</p> <p>There is an absence of more distinctive features that would draw the eye, such as woodland or field ponds found within the LT Open Plateau and High Cross Plateau LCA, which enhances the presence of the settlement edge.</p>
<p>Recreational</p> <p>Landscape offering recreational opportunities where experience of landscape is important.</p>	<p>Site A has strong recreational value and is accessed by PRoW R11// with other well used permissive routes accessing all parts of Site A. It is therefore considered to have a high recreational value.</p>	<p>Site B is accessed by PRoW R23/2. Unlike Site A, access is limited to this route with no permissive routes being evident.</p>
<p>Perceptual (Scenic)</p> <p>Landscape that appeals to the senses, primarily the visual sense.</p>	<p>Site A has strong scenic attributes, with pleasant views of high visual amenity afforded across an intimate, small scale landscape from within the Site itself and externally across it from the north, with positive landscape features that draw the eye including the river corridor, riparian treeline and distinctive topography, providing a backdrop to the wetland areas within the foreground.</p> <p>Development is perceived on a high point along its southern boundary which does detract from its sense of scenic tranquility, however their presence is reduced within views from the north, by the intervening riparian treeline.</p>	<p>Site B has an open, large scale character, affording broader, less distinct views across it and beyond to the wider landscape.</p> <p>Visual amenity is considered to be lower than when compared to Site A. Site B lies within the LT Open Plateau landscape, which provides:</p> <p><i>"The field pattern is generally medium to large in scale but poorly defined, drawing the eye to distant skylines rather than foreground views..."</i></p> <p>This is evident on the ground, where there are few features of visual interest within the surrounding fieldscape and it is noted that the eye is drawn to features around the periphery of the field of view / perceived landscape, comprising a hard settlement edge to the north and caravan site to the south, limiting its scenic value.</p> <p>Overall, there is a reduced sense of visual amenity and of being immersed within the rural countryside, due to the more widely prominent settlement edge and lack visual diversity within the surrounding fieldscape.</p>
<p>Perceptual (Wildness & Tranquillity)</p>	<p>Whilst the B1409 exerts an audible influence, tranquillity levels within Site A are considered to be high. The small, intimate scale of Site A and gently elevated landscape to the immediate</p>	<p>The Site reflects its settlement edge location and is not considered to be particularly tranquil or remote. The internal fieldscape is intensively managed and holds very little sense of wildness.</p>

Factor	Assessment of Value Site A	Assessment of Value Site B
<p>Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies.</p>	<p>north, contributes to a perceived sense of containment from the wider settlement and heightens a strong rural character.</p> <p>The riparian treeline and areas of adjacent wetland alongside the River Anker, extend to the east to other areas of wetland and small water bodies within the Wolvey Wetland Reserve and have a strong sense of inherent wildness.</p>	<p>Ruralness and tranquillity increases heading south, along PRoW R23/2, beyond Site B, as the distance from the settlement edge increases. However, Coventry Road is ever present both audibly and visually due to passing vehicles travelling at the national speed limit.</p>
<p>Functional</p> <p>Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape.</p>	<p>Site A feeds directly into the River Anker and is therefore an important part of the localised Green and Blue Infrastructure.</p> <p>It has a high recreational value providing important access to the surrounding countryside, the River Anker and areas of wetland, that are of strong scenic value. The existing PRoW route is supplemented by an extensive network of permissive footpaths that are evidently popular with local residents and provides important access to the countryside.</p>	<p>Site B's primary function is of a working arable landscape, which contributes to the southern approach into Wolvey. This is acknowledged, however it is less critical to the healthy functioning of the landscape and addressing climate change and biodiversity loss, when compared to the more sensitive and diverse features that are associated with Site A.</p> <p>Site B's contribution to the local green infrastructure network, is limited to its hedgerows, which vary in their levels of intactness and access via the PRoW route, that has no supplementary permissive routes. Site B's contribution to blue infrastructure is limited and of significantly less importance when compared to Site A, evidenced by the Governments flood mapping below.</p> 

3.4. The inherent landscape value of Sites A & B are strongly contrasting on many levels. Site A, is considered to be strongly representative of a more intimate, smaller scale, rural landscape, found within the Village Farmlands LT. Site A is locally distinctive and has been strongly influenced by the River Anker, which shapes its topography, key landscape features and land use, contributing to high levels of natural diversity and importance to both the Green and Blue infrastructure at a local scale. It is valued for providing high levels of access to the countryside and it is notable that the existing PRoW route is supplemented by an extensive network of permissive routes. Site A's scenic value is high, offering high levels of scenic

tranquility and visual amenity through its elevated sense of ruralness and diversity of landscape features. There is a strong sense of being immersed within a rural and tranquil setting and as part of the adjoining landscape to the River Anker, is considered to be important to the healthy functioning of the landscape and a sense of place on the north western edge of Wolvey.

3.5. By comparison, Site B, is characterised by a large scale, relatively homogeneous landscape, that is strongly influenced by its arable land use. Coventry Road and the adjacent roadside hedgerows are considered its most distinctive feature on approach to Wolvey from the south, however beyond this, there are limited features of note. The lack of diversity draws the eye to what is quite a hard settlement edge, along Site B's northern boundaries and limits its scenic value overall. Intensive arable farming has reduced Site B's Functional value, limiting its contribution to the localised green infrastructure network, with a very limited contribution to the localised blue infrastructure when compared to Site A.

3.6. When considered in the round, Site A is considered to be of medium / high landscape value, compared to Site B, which is considered to be of medium / low landscape value.

3.7. **Susceptibility to Residential Development**

3.8. Both sites are located on the settlement edge, however Site A forms part of a shallow valley that is strongly self-contained, resulting in a small, intimate scale landscape. The riparian treeline along Site A's northern boundary and the adjacent wetland areas and pastoral fields to the north and south are strongly interlinked and are highly susceptible to residential development. These features are locally prominent and provide a strong visual focal point from within the settlement edge and the localised setting to the north, providing strong visual links with the wetland areas to the east and west as the River Anker flows into Wolvey. Site A is therefore considered a distinctive landscape, that is important to a sense of place where a heightened sense of ruralness and the influence of the River Anker is evident. Its susceptibility to change is heightened by its inherent landscape values identified above and its small intimate scale, which would amplify the perceived scale of residential development introduced to Site A.

3.9. Conversely, Site B has fewer distinctive features that are susceptible to residential development. Development would naturally result in the loss of some working farmland, but

this would not result in any irreparable harm or loss to the Open Pastures LT, due to its larger scale and greater proliferation of such typical arable land within the wider landscape, which would remain intact beyond Site B's boundaries. This would not be the case within Site A, where the loss of pasture land and the perceived impact on the River Anker and adjacent areas of wetland, within a smaller more contained landscape, would be amplified and far more significant, leading to irreparable loss. Moving back to Site B the Coventry Road approach and roadside hedgerows are a positive landscape features which would require careful landscape treatment and preservation, which is achievable. However, it is perceived as part of the established setting to Wolvey, where the backdrop of the settlement edge has a strong influence. Site B is potentially more visually exposed to a greater quantum of visual receptors and the visual influence of residential development within it would likely extend over a greater area when compared to Site A. However, the susceptibility of these receptors, including motorists along Coventry Road and walkers accessing the PRow R23/2 and R21/1 to the east, are lower than compared to the receptors associated with Site A, who experience a stronger sense of visual amenity and a less imposing settlement edge.

3.10. The susceptibility of Site A, to residential development in landscape and visual terms, is therefore considered to be High, whilst Site B is considered to be Low.

3.11. **Overview of Sensitivity and Landscape / Visual Capacity**

3.12. When combining the assessment of inherent landscape value and susceptibility to change, it is considered that Site A is of High Sensitivity to change whilst Site B is of Low Sensitivity.

3.13. Site A is considered to have significantly less capacity to accommodate the nature of the change proposed, due to its smaller scale and heightened susceptibility. It contains a far broader range of distinctive landscape features, that cannot be replaced or mitigated. Any development within Site A, would be of a far greater perceived magnitude, when placed within a landscape that is strongly intimate and perceived to have high levels of tranquility and ruralness.

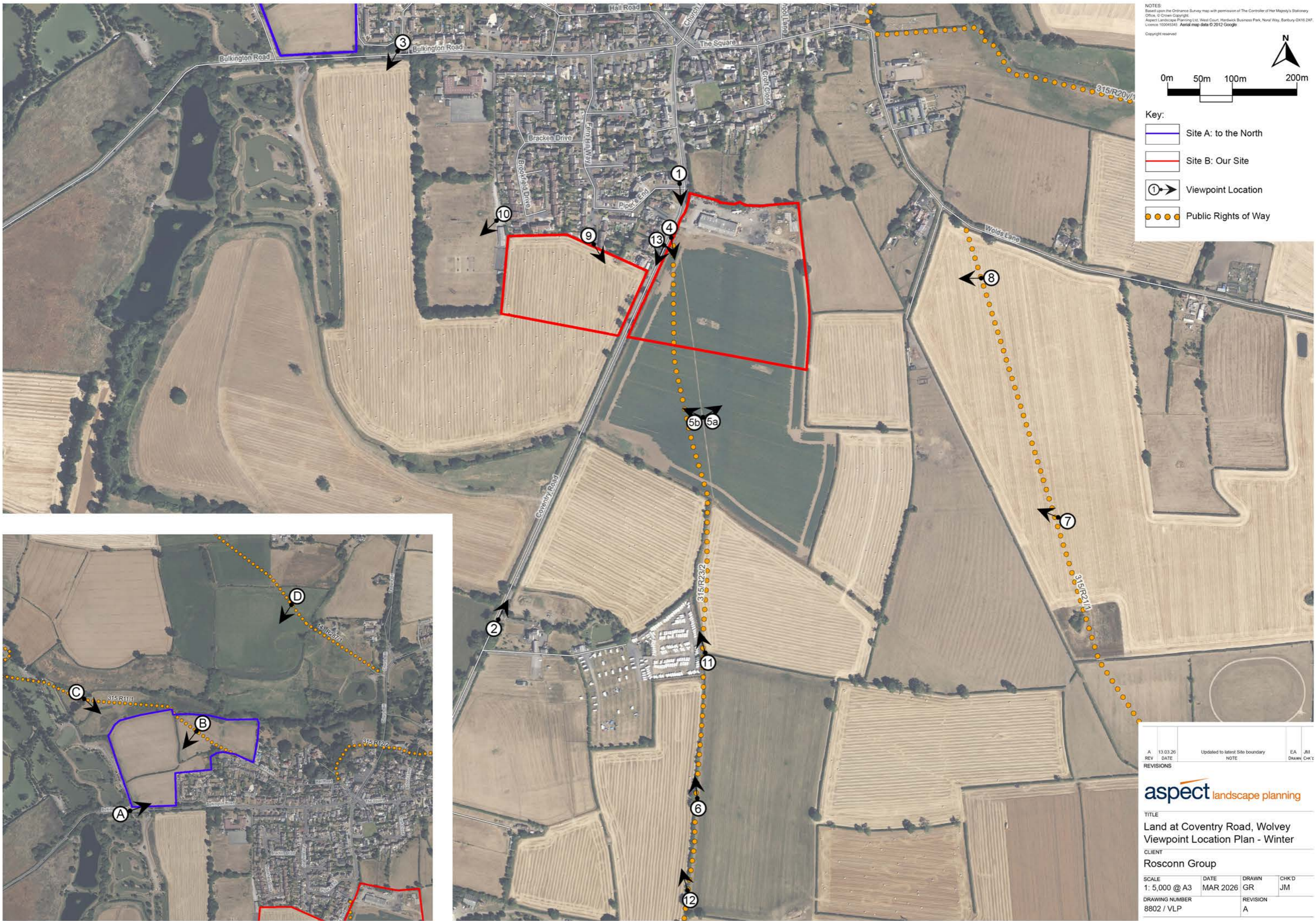
3.14. Site B has a stronger sense of openness and scale. However, this increases the influence of the settlement edge over Site B, which does not possess any qualities or features that elevate it above ordinary countryside. This is not a remote or strongly tranquil landscape, with such qualities perceived to be more heightened further to south, where study parcel WV 12,

within the Council's LSS, extends a considerable distance from the settlement edge. There are opportunities to create a more sensitive settlement edge that would be less imposing on the retained countryside and fundamentally, mitigation measures could be introduced that would offset the localised loss of the internal arable land. The localised change introduced to this part of the LT Open Plateau landscape, would not be fundamental or irreparable as would be the case within Site A.

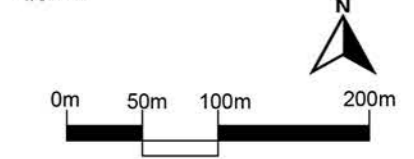
- 3.15. To conclude, it is considered that Site B has capacity in both landscape and visual terms to accommodate a sensitive, site responsive residential development and is more supportable when compared to Site A, which is considered an inappropriate location.

Enclosures

Photographic Record

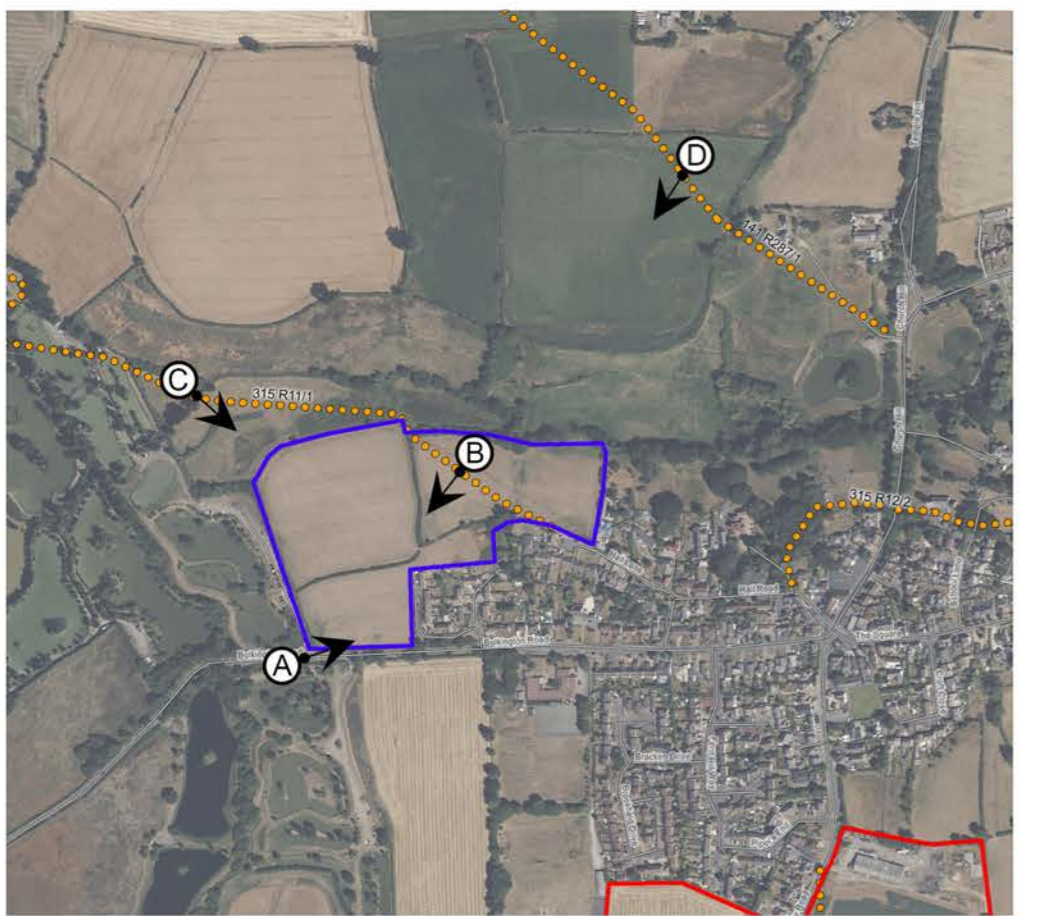


NOTES:
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Key:

- Site A: to the North
- Site B: Our Site
- Viewpoint Location
- Public Rights of Way



A	13 03 26	Updated to latest Site boundary	EA	JM
REV	DATE	NOTE	DRAWN	CHK'D
REVISIONS				

aspect landscape planning

TITLE
 Land at Coventry Road, Wolvey
 Viewpoint Location Plan - Winter

CLIENT
 Rosconn Group

SCALE	DATE	DRAWN	CHK'D
1: 5,000 @ A3	MAR 2026	GR	JM
DRAWING NUMBER	REVISION		
8802 / VLP	A		

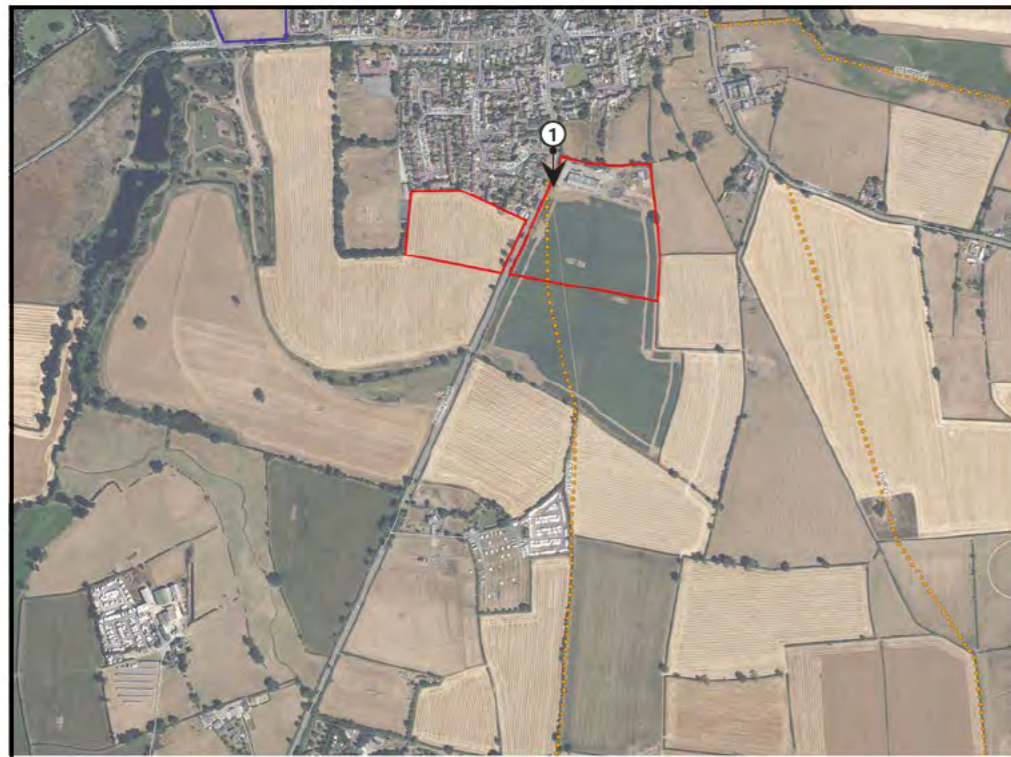
Eastern parcel of Site B located beyond existing hedgerow boundary

Western parcel of Site B located beyond intervening residential properties



Existing farm structure within eastern parcel

Coventry Road (B4065)



Distance to Site: 0.03 km
Viewpoint Coordinates: E 442936, N 287604
Date & time of photograph: 10/03/2026 14:43
AOD & Viewing height: c. 117.7m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint 1 (Panorama Image for Context Only)
Equipment & Focal Length: Canon EOS 2000D 35mm lens
Horizontal Field of View: 90°
Vertical Field of View: 27°

N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a crop sensor camera with 35mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 90° and when printed at A3, should be viewed at a distance of 542mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.



Viewpoint 1 (Single Frame Image)

Approximate extent of site

Western parcel of Site B

The White House

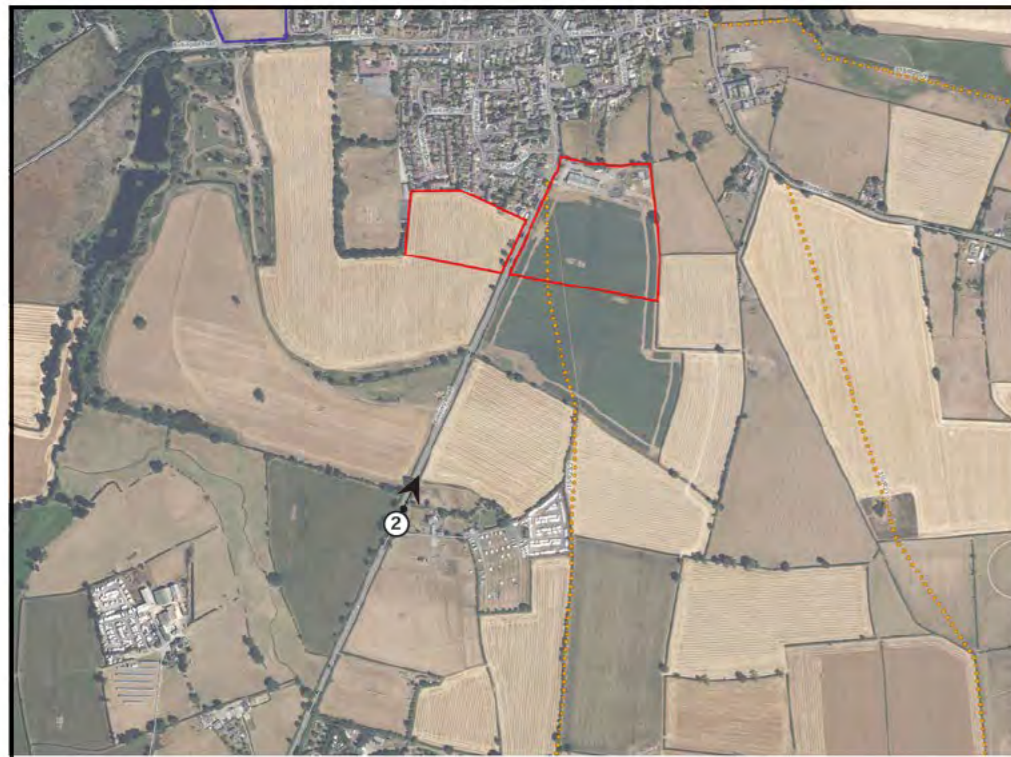


Coventry Road (B4065)

Existing built residential properties along the north boundary on the western parcel of Site B

Existing farm structure located within the eastern parcel of Site B

Existing built residential properties associated with Wolds Lane



Distance to Site: 0.46 km
Viewpoint Coordinates: E 442658, N 286939
Date & time of photograph: 10/03/2026 16:01
AOD & Viewing height: c. 112.6m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint 2 (Panorama Image for Context Only)
Equipment & Focal Length: Canon EOS 2000D 35mm lens
Horizontal Field of View: 90°
Vertical Field of View: 27°

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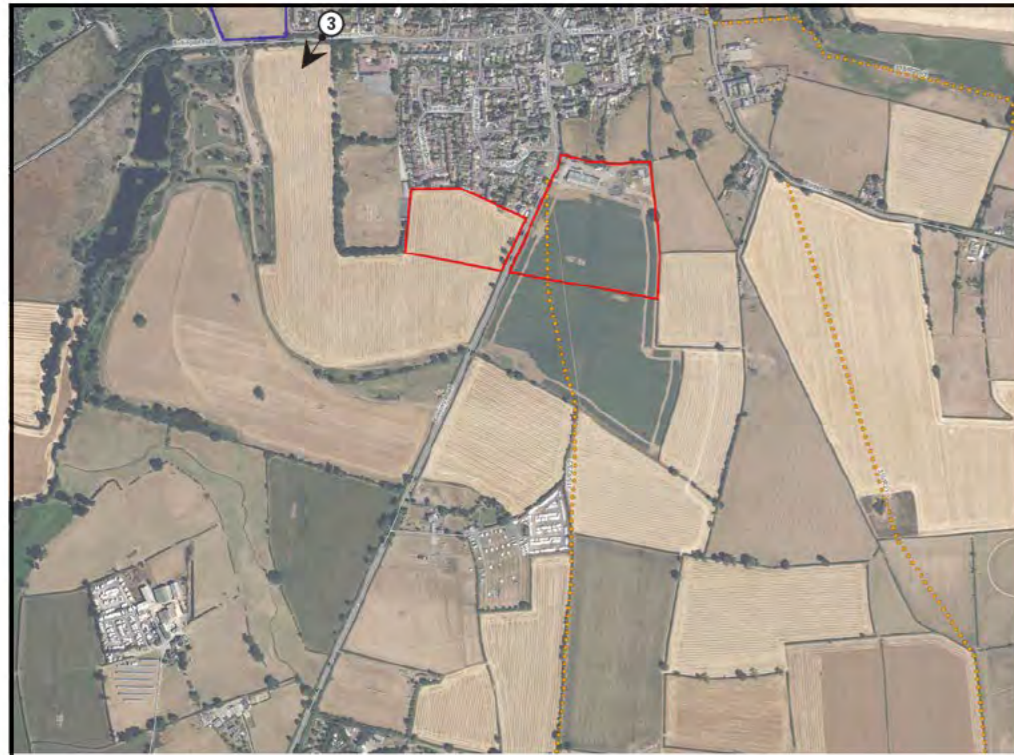


Viewpoint 2 (Single Frame Image)



B4109

Bulkington Road



Distance to Site: 0.32 km
 Viewpoint Coordinates: E 442494, N 287803
 Date & time of photograph: 10/03/2026 16:33
 AOD & Viewing height: c. 111.2m AOD 1.6m
 Weather conditions Clear, good visibility

Viewpoint 3 (Panorama Image for Context Only)
 Equipment & Focal Length: Canon EOS 2000D 35mm lens
 Horizontal Field of View: 90°
 Vertical Field of View: 27°

N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a crop sensor camera with 35mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 90° and when printed at A3, should be viewed at a distance of 542mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.



Viewpoint 3 (Single Frame Image)

Site extends beyond view



Farm structure located within the eastern parcel

Eastern parcel of Site B

Existing built forms associated with Wolds Lane

Existing built form associated with Coal Pit Lane

Public Right of Way (315/R23/2)



Distance to Site: 0.00 km
Viewpoint Coordinates: E 442927, N 287532
Date & time of photograph: 10/03/2026 14:46
AOD & Viewing height: c. 117m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint 4 (Panorama Image for Context Only)
Equipment & Focal Length: Canon EOS 2000D 35mm lens
Horizontal Field of View: 90°
Vertical Field of View: 27°

N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a crop sensor camera with 35mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 90° and when printed at A3, should be viewed at a distance of 542mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.



Viewpoint 4 (Single Frame Image)

Site extends beyond viewpoint

Western parcel of Site B

Eastern parcel of Site B

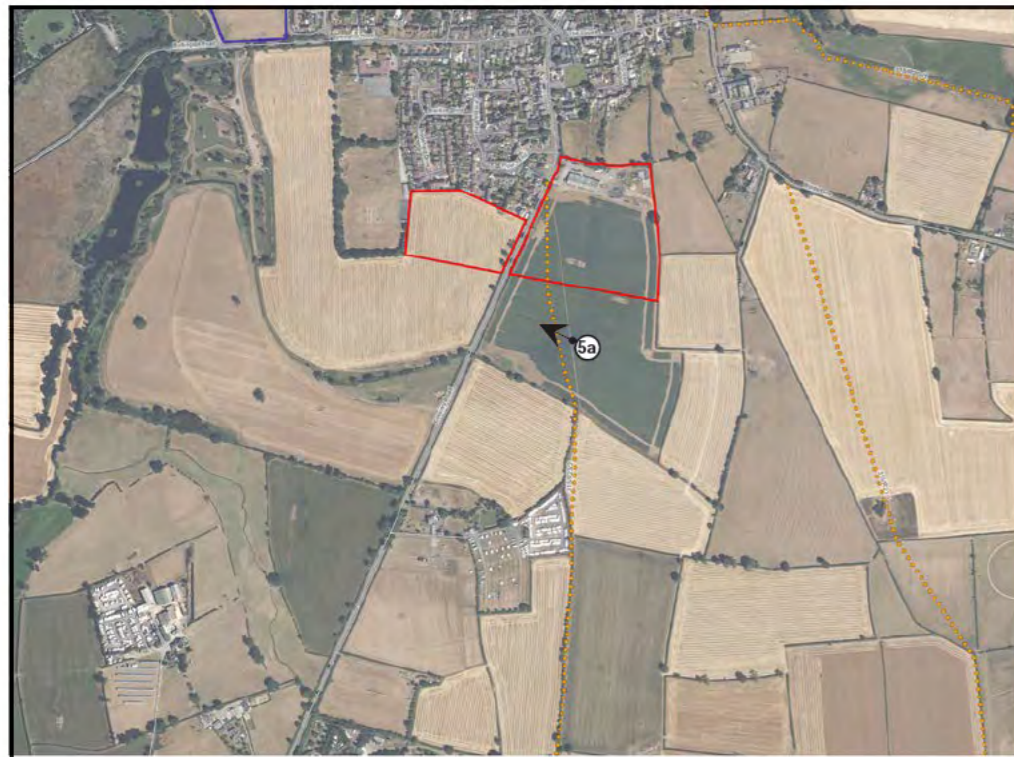


Overhead lights within
Wolvey playing field to the north of
western parcel

Existing residential properties located
along the northern boundary of the
western parcel of Site B

Existing residential properties associated
with Coventry Road (B4065)

Public Right of Way
(315/R23/2)



Distance to Site: 0.17 km
Viewpoint Coordinates: E 442964, N 287256
Date & time of photograph: 10/03/2026 14:51
AOD & Viewing height: c. 109.1m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint 5a (Panorama Image for Context Only)
Equipment & Focal Length: Canon EOS 2000D 35mm lens
Horizontal Field of View: 90°
Vertical Field of View: 27°

N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a crop sensor camera with 35mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 90° and when printed at A3, should be viewed at a distance of 542mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.



Viewpoint 5a (Single Frame Image)

Site extents beyond viewpoint

Existing residential properties associated with Coventry Road

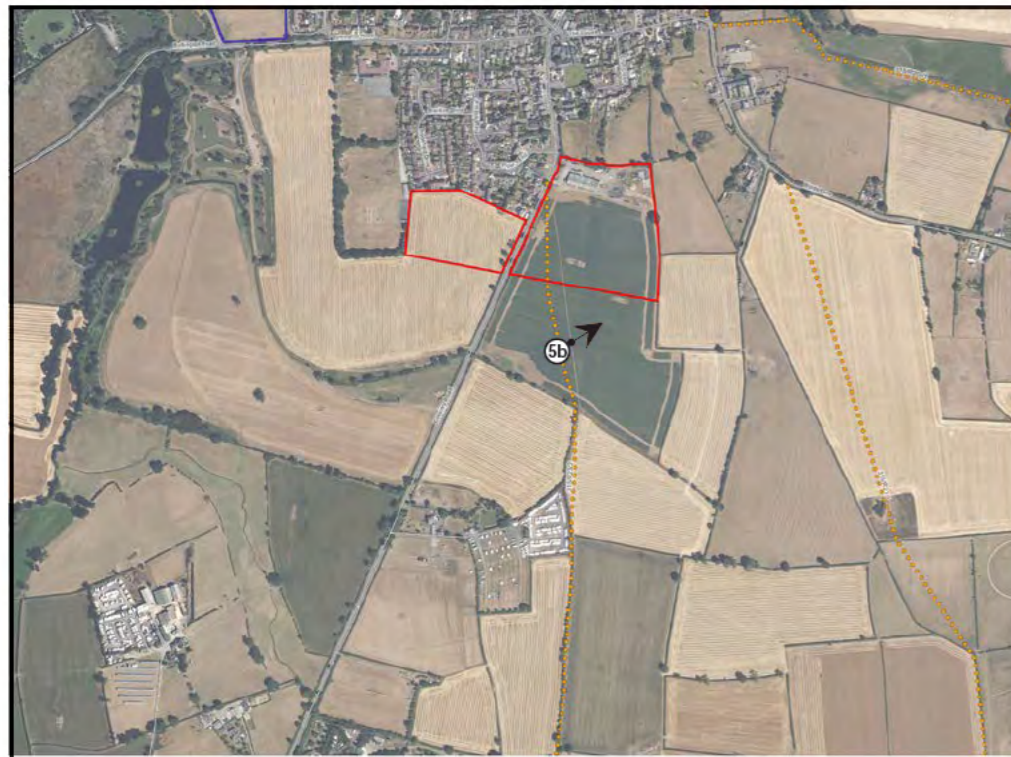


Public Right of Way (315/R23/2)

Existing farm structure located within the eastern parcel of Site B

Existing residential properties associated with Wolds Lane

The White House



Distance to Site: 0.11 km
Viewpoint Coordinates: E 442964, N 287256
Date & time of photograph: 10/03/2026 14:51
AOD & Viewing height: c. 109.1m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint 5b (Panorama Image for Context Only)
Equipment & Focal Length: Canon EOS 2000D 35mm lens
Horizontal Field of View: 90°
Vertical Field of View: 27°

N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a crop sensor camera with 35mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 90° and when printed at A3, should be viewed at a distance of 542mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.



Viewpoint 5b (Single Frame Image)

Approximate extent of site

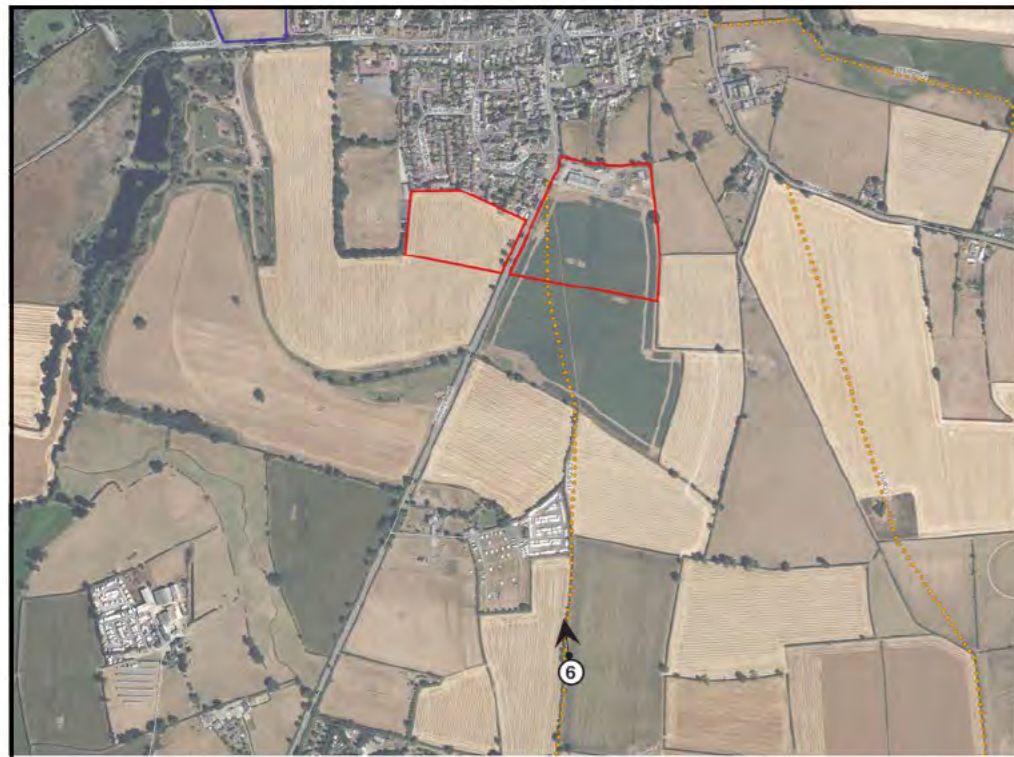


Wolvey Caravan and Camping Park

Western parcel of Site B located beyond intervening vegetation

Glimpsed view of Eastern parcel of Site B located beyond existing vegetation

Public Right of Way (315/R23/2)



Distance to Site: 0.71 km
Viewpoint Coordinates: E 442946, N 286492
Date & time of photograph: 10/03/2026 15:11
AOD & Viewing height: c. 115.2m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint 6 (Panorama Image for Context Only)
Equipment & Focal Length: Canon EOS 2000D 35mm lens
Horizontal Field of View: 90°
Vertical Field of View: 27°

N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a crop sensor camera with 35mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 90° and when printed at A3, should be viewed at a distance of 542mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.



Viewpoint 6 (Single Frame Image)

Approximate extent of site



Public Right of Way (315/R21/1)

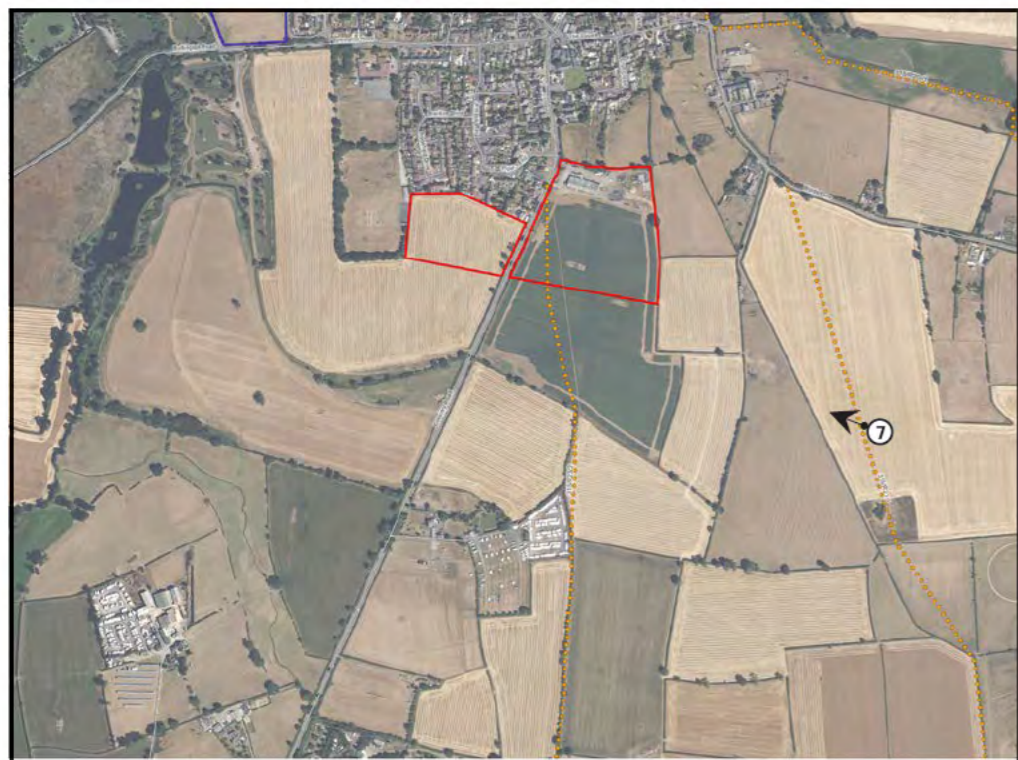
Western parcel of Site B located beyond intervening vegetation

Existing farm structure located within eastern parcel of Site B

Existing residential properties associated with Wolds Lane

The White House

Existing residential properties associated with Coventry Road (B4065)



Distance to Site: 0.44 km
Viewpoint Coordinates: E 443516, N 287088
Date & time of photograph: 10/03/2026 15:45
AOD & Viewing height: c. 115.7m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint 7 (Panorama Image for Context Only)
Equipment & Focal Length: Canon EOS 2000D 35mm lens
Horizontal Field of View: 90°
Vertical Field of View: 27°

N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a crop sensor camera with 35mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 90° and when printed at A3, should be viewed at a distance of 542mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.



Viewpoint 7 (Single Frame Image)

Approximate extent of site



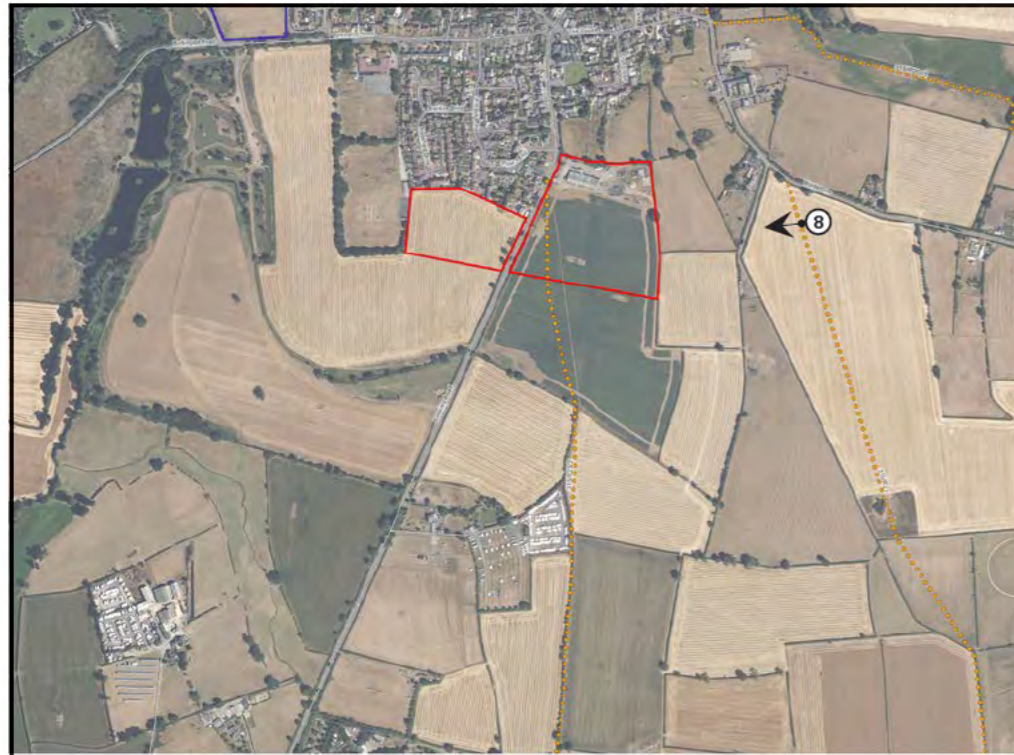
Public Right of Way
(315/R21/1)

Western parcel of Site B located beyond
intervening vegetation

Existing residential properties
associated with Coventry
Road (B4065)

Existing farm structure
within eastern parcel of Site B

Existing residential properties
associated with Wolds Lane



Distance to Site: 0.26 km
Viewpoint Coordinates: E 443377, N 287489
Date & time of photograph: 10/03/2026 15:40
AOD & Viewing height: c. 113.7m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint 8 (Panorama Image for Context Only)
Equipment & Focal Length: Canon EOS 2000D 35mm lens
Horizontal Field of View: 90°
Vertical Field of View: 27°

N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a crop sensor camera with 35mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 90° and when printed at A3, should be viewed at a distance of 542mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.



Viewpoint 8 (Single Frame Image)

Eastern parcel of Site B located beyond existing built forms and hedgerow boundary

Western parcel of Site B



Wolvey Caravan and Camping Park

Coventry Road (B4065)

Fern Hill Way

Wolvey Villa Farm

R & L Fletcher and Son



Distance to Site: 0.01 km
Viewpoint Coordinates: E 442801, N 287513
Date & time of photograph: 10/03/2026 16:10
AOD & Viewing height: c. 114.8m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint 9 (Panorama Image for Context Only)

Equipment & Focal Length: Canon EOS 2000D 35mm lens

Horizontal Field of View: 90°

Vertical Field of View: 27°

N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a crop sensor camera with 35mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 90° and when printed at A3, should be viewed at a distance of 542mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.



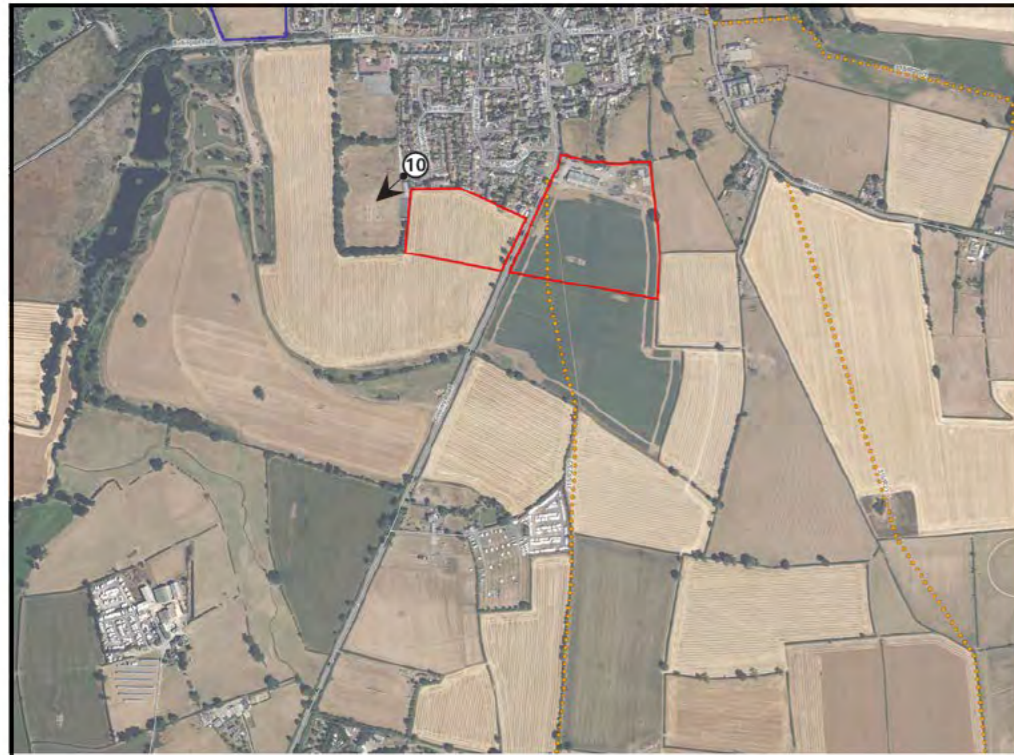
Viewpoint 9 (Single Frame Image)

Western parcel of site B located beyond existing built form

Kilmore House



Wolvey playing field



Distance to Site: 0.03 km
Viewpoint Coordinates: E 442652, N 287550
Date & time of photograph: 10/03/2026 16:21
AOD & Viewing height: c. 113m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint 10 (Panorama Image for Context Only)
Equipment & Focal Length: Canon EOS 2000D 35mm lens
Horizontal Field of View: 90°
Vertical Field of View: 27°

N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a crop sensor camera with 35mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 90° and when printed at A3, should be viewed at a distance of 542mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.



Viewpoint 10 (Single Frame Image)

Wolvey Caravan and Camping Park located beyond existing hedgerow

Approximate extent of site

The White House



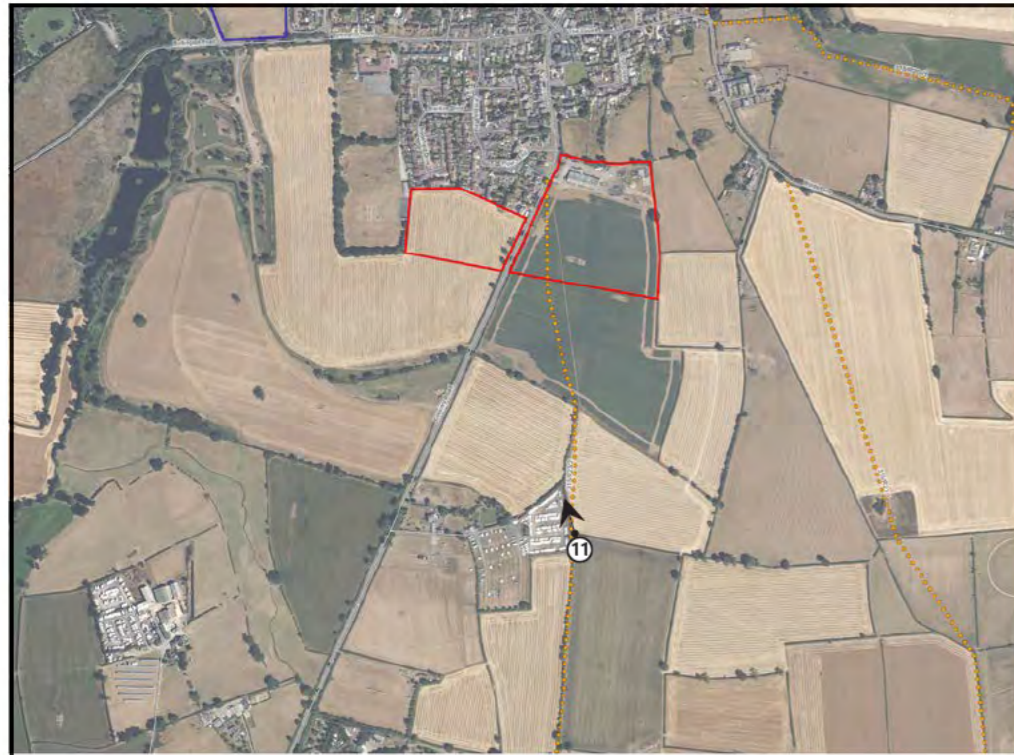
Public Right of Way 315 R23/2

Western parcel of Site B located beyond existing vegetaton

Existing residential properties associated with Coventry Road

Existing farm structure located within the eastern parcel of Site B

Existing residential properties associated with Wolds Lane



Distance to Site: 0.46 km
Viewpoint Coordinates: E 442975, N 286880
Date & time of photograph: 10/03/2026 15:15
AOD & Viewing height: c. 112.6m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint 11 (Panorama Image for Context Only)
Equipment & Focal Length: Canon EOS 2000D 35mm lens
Horizontal Field of View: 90°
Vertical Field of View: 27°

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Viewpoint 11 (Single Frame Image)

Approximate extent of site

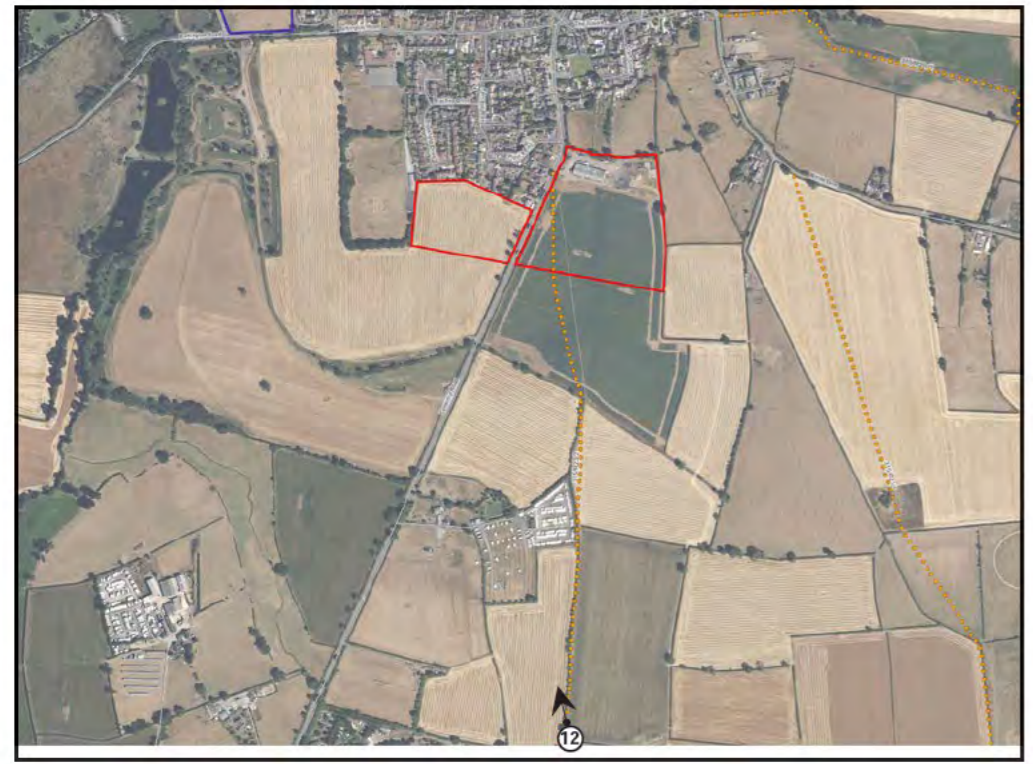


Western parcel of Site B located beyond existing vegetation

Public Right of Way 315 R23/2

Glised view of eastern parcel of Site B

Existing residential properties associated with Wolds Lane



Distance to Site: 0.86 km
Viewpoint Coordinates: E 442953, N 286485
Date & time of photograph: 10/03/2026 15:07
AOD & Viewing height: c. 114.7m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint 12 (Panorama Image for Context Only)
Equipment & Focal Length: Canon EOS 2000D 35mm lens
Horizontal Field of View: 90°
Vertical Field of View: 27°

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Viewpoint 12 (Single Frame Image)

Wolvey Caravan and Camping Park

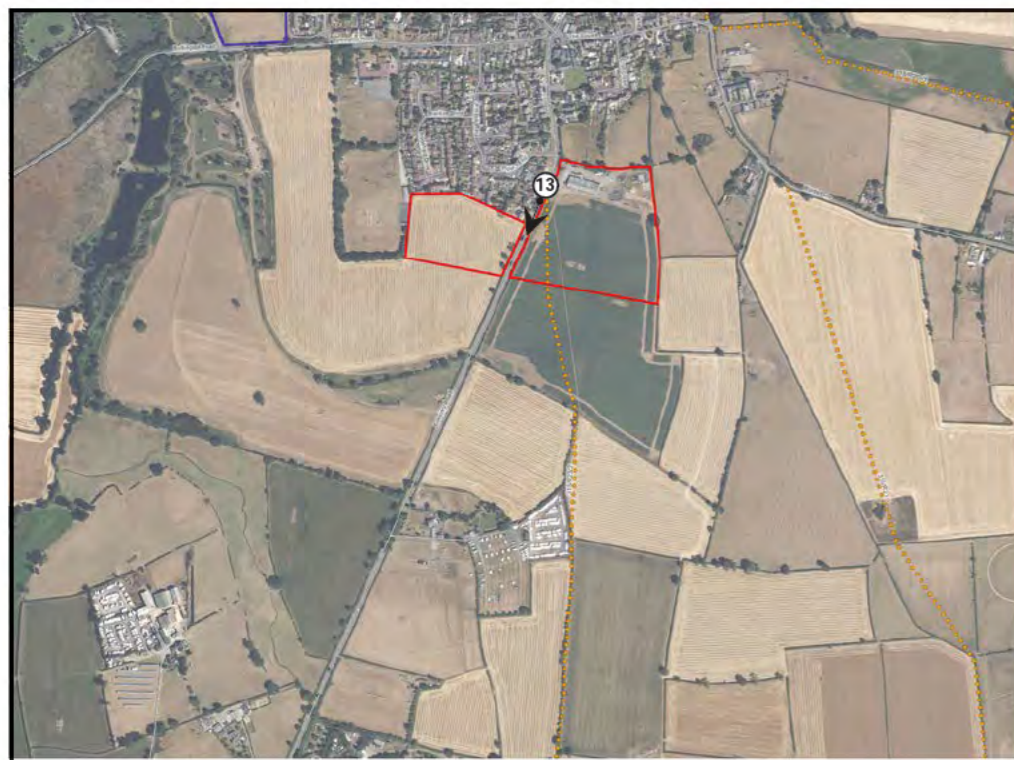
Wolvey Villa Farm



Eastern parcel of Site B located beyond existing vegetation

Coventry Road (B4065)

Western parcel of Site B located beyond existing residential properties



Distance to Site: 0.01 km
 Viewpoint Coordinates: E 442912, N 287513
 Date & time of photograph: 10/03/2026 15:27
 AOD & Viewing height: c. 117m AOD 1.6m
 Weather conditions Clear, good visibility

Viewpoint 13 (Panorama Image for Context Only)
 Equipment & Focal Length: Canon EOS 2000D 35mm lens
 Horizontal Field of View: 90°
 Vertical Field of View: 27°

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Viewpoint 13 (Single Frame Image)

Glimpsed views of Site A beyond existing vegetation



B4109



Distance to Site: 0.02 km
 Viewpoint Coordinates: E 442301, N 287800
 Date & time of photograph: 10/03/2026 13:47
 AOD & Viewing height: c. 103.2m AOD 1.6m
 Weather conditions Clear, good visibility

Viewpoint A (Panorama Image for Context Only)
 Equipment & Focal Length: Canon EOS 2000D 35mm lens
 Horizontal Field of View: 90°
 Vertical Field of View: 27°

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Viewpoint A (Single Frame Image)

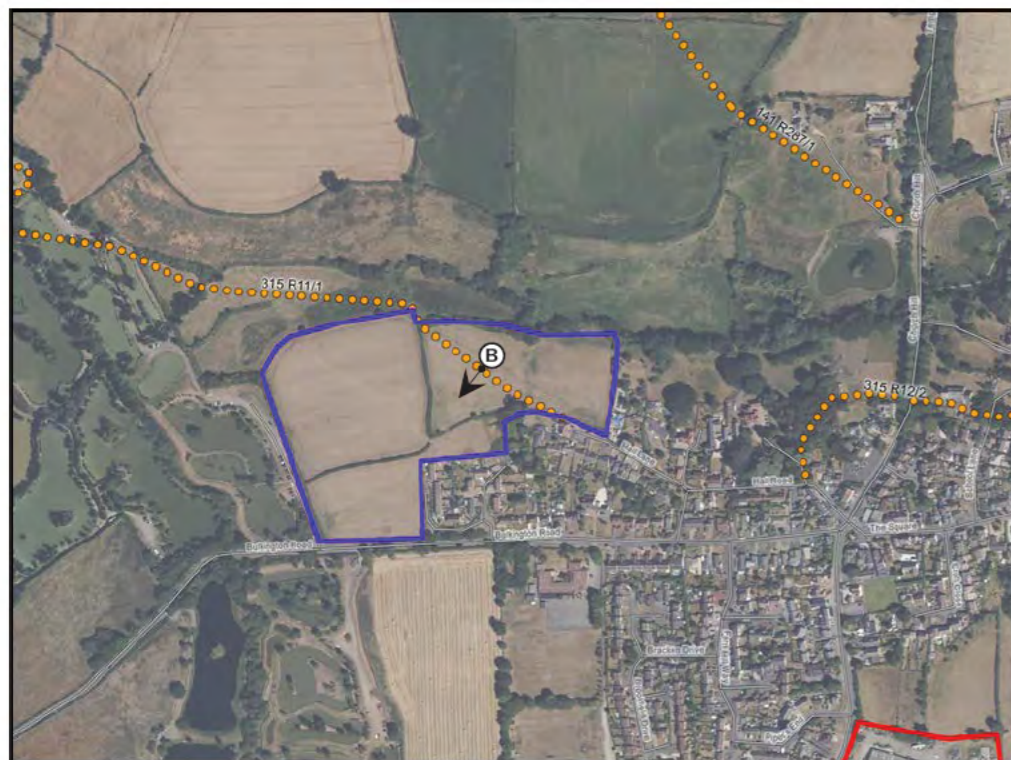
Existing Vegetation within Site A



Existing residential property associated within Bulkington Road

Site A

Public Right of Way 315 R11/1



Distance to Site: 0.00 km
Viewpoint Coordinates: E 442538, N 288008
Date & time of photograph: 10/03/2026 13:57
AOD & Viewing height: c. 105.8m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint B (Panorama Image for Context Only)
Equipment & Focal Length: Canon EOS 2000D 35mm lens
Horizontal Field of View: 90°
Vertical Field of View: 27°

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Viewpoint B (Single Frame Image)

Site extends beyond view



Existing residential properties associated with Bulkington Road

Glimpsed view of Site A

Public right of Way 315 R11/1



Distance to Site: 0.11 km
Viewpoint Coordinates: E 442201, N 288122
Date & time of photograph: 10/03/2026 14:07
AOD & Viewing height: c. 100.0m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint C (Panorama Image for Context Only)
Equipment & Focal Length: Canon EOS 2000D 35mm lens
Horizontal Field of View: 90°
Vertical Field of View: 27°

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Viewpoint C (Single Frame Image)

Approximate extent of site

Site A



Existing residential properties associated with Hall Lane

Existing residential properties associated with Bulkington Road



Distance to Site: 0.35 km
Viewpoint Coordinates: E 442736, N 288393
Date & time of photograph: 10/03/2026 14:27
AOD & Viewing height: c. 112.6m AOD 1.6m
Weather conditions Clear, good visibility

Viewpoint D (Panorama Image for Context Only)

Equipment & Focal Length: Canon EOS 2000D 35mm lens

Horizontal Field of View: 90°

Vertical Field of View: 27°

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Viewpoint D (Single Frame Image)

**Appendix 4: Wolvey Parish Council Minutes –
January 2026**

MINUTES OF THE MEETING OF WOLVEY PARISH COUNCIL
HELD ON MONDAY 19 JANUARY 2026 AT 7.00pm IN
WOLVEY BAPTIST CHAPEL

Present: Adrian Warwick John Hawkins, Charlie James, Pauline Russell, Bill Silvester, Jas Guraya, Matt Dore

Apologies: Cllr Mauodis.

In attendance: Lindsay Foster
One Hundred and ten members of the public

465/24 Chairman's Announcement

The Chair welcomed everyone to the meeting and explained that the meeting would take place in 2 parts. The first half of the meeting would be a standard Parish Council meeting, and the second half would be a question-and-answer session regarding the RBC local plan.

466/24 Declarations of Interest and Grant of Dispensation

Councillor John Hawkins declared an interest in any matter relating to Wolvey Playing Fields Trust.

Councillor Warwick declared an interest in Wolvey Baptist Chapel and in any matter by reason of him being a Member of Warwickshire County Council.

Cllr James declared an interest in any matter relating to Wolvey speed watch.

467/24 Minutes of the meeting held on 15 December 2025

RESOLVED that the minutes of the meeting held on 15 December 2025 be confirmed and signed by the Chair as a correct record.

468/24 Parishioners' Time

Issues with parking on Leicester Road. Query whether double yellow lines can be installed. Discussions are ongoing regarding whether an area can be open for parking to solve issues as double yellow lines would disperse the issue rather than solve it.

Query about shipping container at playing field, Cllr Warwick confirmed that this discussion needs to take place directly with the playing field committee.

469/24 Warwickshire County Council – Update

(a) Budget discussions are ongoing.

470/24 Rugby Borough Council – Update

(a) none

471/24 Community Speed watch – Update

Speed watch recommenced after Christmas. Multiple drivers driving 50mph on Coventry Road. Speed watch completed within 1 hour due to number of speeding drivers. Resident query whether average speed cameras can be installed.

472/24 Wolvey Wetland Trust

(a) Lease was returned on December 30th 2025 following cooling off period. We await update from Solicitors as they are yet to locate signed copy. Insurance now in place and a joint statement to be made. Work to begin next week.

473/24 Wolvey Playing Field

(a) Some works to be postponed until dry weather due to ground conditions.

474/24 Clerk's Report

475/24 Planning

- (a) Applications responded to under delegated authority R25/1042 at LAND TO THE REAR OF 25, CROFT CLOSE, WOLVEY, HINCKLEY, LE10 3LE for Construction of 3no. single storey wooden stables, tack room and hay/feed store. **No comment**
- (b) The Parish Council considered the following new planning applications and comments:
 - i) none
- (c) The update on recent planning applications was noted.
- (d) Local plan update: Carry until part 2 of meeting

476/24 Financial Matters

The parish council considered the financial matters relating to the Parish Council. **RESOLVED** that

- (a) To note the following payments made since the last meeting under delegated powers:
 - (i) J Guraya- reimbursement Christmas presents- £103.64
 - (ii) P Russell- reimbursement - £29
 - (iii) Wolvey Baptists- Parish Grant- £500
 - (iv) Wolvey youth club- parish grant- £500
 - (v) Wolvey Brownies- parish grant- £500
 - (vi) Wolvey Playing Field Trust- Parish Grant- £3000
- (b) The following payments be agreed and authorised:
 - (i) Clerk's salary and expenses – to be advised
 - (ii) WS Gardens- Christmas tree works inv 14140- £180
 - (iii) WS Gardens- metal stand for tree inv 14134- £450
 - (iv) Wolvey Village Hall- room hire inv 000986- £84

- (c) The following direct debits be noted:
 - (i) Nest Pension- December- £30.24
 - (ii) Unity Trust Bank Fees- November £6
 - (iii) Unity Trust Bank Fees- December £6

- (d) To note the following income received:
 - (i) HMRC- VAT refund- £1586.83
 - (ii) HMRC- VAT refund- £3838.47RBC funds outstanding.

- (e) To note the Quarter 2 and 3 financial reports for the period ending 30 September and December 2025:
 - (i) Cash Book **Approved by all**
 - (ii) Bank Reconciliation Statement **Approved by all**
 - (iii) Budget Monitoring **Approved by all**

477/24 Environment Matters

- (i) issues with dog mess around the village and bags being hung in trees. Raise the issue with local PCSO and investigate signage.

478/24 Traffic Calming and Signage

Scheme issues for delivery between January and March 2026. £6790 to be provided by the Parish Council towards scheme with the remainder funded by WCC grant. Plans to be added to social media.

479/24 Sign installation

- a) Quote required- no response from one local contractor

480/24 Communication

- a) Information regarding local plan will be added to Facebook, Instagram and website.

481/24 Noticeboard

- a) Follow up with countryside.

482/24 Items for Next Meeting

Local Plan
Christmas Lights

Part 2 of Meeting to discuss RBC Local Plan with question-and-answer session

Standing orders suspended at 19.30 proposed by Cllr Warwick seconded by Cllr Hawkins.

Thank you to the residents of Wolvey for submitting objections in the previous consultation. There has been a reduction in the number of houses proposed in Wolvey in this version of the Local Plan from 710 houses to 210 houses. Lawford submitted 44 objections, 300 objections were received from Wolvey.

The regulation 18 consultation has now completed, and RBC will begin the regulation 19 consultation. In this round if you wish to object this must be done using technical objections and whether the plan is 'sound'. Wolvey Parish Council can assist with this.

Rugby does not have a 5-year land supply and currently only has 4.16 years. There has been a rise in non-green belt speculative applications due to this. A proportion of land has also been allocated as grey belt rather than green belt and will affect the buffer between the villages and Coventry.

In the regulation 18 consultation WCC did not agree with the dispersal strategy due to the increased costs of home to school transport, the increased carbon footprint and traffic movements.

The Parish Council do not like the proposal of housing in the Anker Valley of 150 houses. The Parish Council will put forward a proposal of housing opposites the site already proposed on Coventry Road with 60 houses. The proposal is not perfect but is more suitable for the village. The extra facilities of a shop, community centre will not be required.

It is believed the Anker Valley site has been used as RBC believe it is deliverable. It is confirmed that Severn Trent can comment on the water, sewage facilities in the village. New accesses would need to be created but are indicative on the current plan. The Parish Council would also request that the 30mph area would be extended. Residents are concerned that the Anker Valley area is ecologically more valuable. Concern that the wildlife corridor will be destroyed and the ongoing flooding issues and will cause further issues downstream should building go ahead. There are traffic concerns existing on Hall Lane which will be exacerbated by the proposed development.

The plan will be scrutinised by the Planning Inspector, and the Parish Council will be able to speak at the hearing.

If the plan is unsound the inspector can reject it or make modifications this includes adding homes.

It is believed the increased housing around the area is partly due to the employment land proposed at Ansty.

Preprepared emails cannot be sent as this will be treated as a petition. All emails should be personal to each resident although the Parish Council can assist with suggestions if required. A leaflet with further information will be produced.

The plan was approved by RBC cabinet and will be discussed by full council on 27th January. We encourage residents to attend at the Town Hall.

Proposal to residents in attendance. Would you prefer the Anker Valley site to be included or would you prefer the alternative site on Coventry Road.

2 for the Anker Valley site

Remainder for the Coventry Road site

Proposed by Cllr Russell seconded by Cllr Hawkins to contact RBC and state that the Parish Council object to the proposed housing, but should we have to continue with an allocation we would prefer the proposed site on Coventry Road with an extra site on the land opposite on Coventry Road and to remove the Anker Valley proposal. **Agreed by all**

483/24 **Date of Next Meeting** – Monday 16 February 2026 at 7.30pm approved by all

The meeting closed at 8.30 p.m.

Signed _____ Date: _____

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
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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"/>	<input type="text" value="Mrs"/>
First Name	<input type="text"/>	<input type="text" value="Fiona"/>
Last Name	<input type="text"/>	<input type="text" value="Lee-McQueen"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Rosconn Group"/>	<input type="text" value="Turley"/>
Address Line 1	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address	<input type="text"/>	<input type="text" value="REDACTED"/>

(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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text" value="D5"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

Please see paragraphs 3.74 to 3.75 of our supporting statement.

(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 see paragraphs 3.74 to 3.75 of our supporting statement.

(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, 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:

Seeking to make a change or an addendum to the Plan.

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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.

n/a

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.

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(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?

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

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Please see paragraphs 3.45 to 3.46 of our supporting statement.

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

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E-mail Address	<input type="text"/>	<input type="text" value="REDACTED"/>

(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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text" value="EN6"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

Please see paragraphs 3.47 to 3.49 of our supporting statement.

(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 see paragraphs 3.47 to 3.49 of our supporting statement.

(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)

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:

Seeking to make a change or an addendum to the Plan.

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.

n/a

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Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official
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Name of the Local Plan to which
this representation relates:

Rugby Borough Council Proposed
Submission Local Plan

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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"/>	<input type="text" value="Mrs"/>
First Name	<input type="text"/>	<input type="text" value="Fiona"/>
Last Name	<input type="text"/>	<input type="text" value="Lee-McQueen"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Rosconn Group"/>	<input type="text" value="Turley"/>
Address Line 1	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address	<input type="text"/>	<input type="text" value="REDACTED"/>

(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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	H1	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

Please see paragraphs 3.50 to 3.52 of our supporting statement.

(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 see paragraphs 3.50 to 3.52 of our supporting statement.

(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.

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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, 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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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.

n/a

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Representation Form for Local Plans



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Ref:

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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.*

Title

Mrs

First Name

Fiona

Last Name

Lee-McQueen

Job Title
(where relevant)

Director

Organisation
(where relevant)

Rosconn Group

Turley

Address Line 1

[REDACTED]

Line 2

[REDACTED]

Line 3

[REDACTED]

Line 4

[REDACTED]

Post Code

[REDACTED]

Telephone Number

[REDACTED]

E-mail Address

[REDACTED]

(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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	H2 <input type="text"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

Please see paragraphs 3.53 to 3.61 of our supporting statement.

(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 see paragraphs 3.53 to 3.61 of our supporting statement.

(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.

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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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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.

n/a

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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.*

Title

Mrs

First Name

Fiona

Last Name

Lee-McQueen

Job Title
(where relevant)

Director

Organisation
(where relevant)

Turley

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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	H6	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

Please see paragraphs 3.62 to 3.67 of our supporting statement.

(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 see paragraphs 3.62 to 3.67 of our supporting statement.

(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, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

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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"/>	<input type="text" value="Mrs"/>
First Name	<input type="text"/>	<input type="text" value="Fiona"/>
Last Name	<input type="text"/>	<input type="text" value="Lee-McQueen"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Rosconn Group"/>	<input type="text" value="Turley"/>
Address Line 1	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address	<input type="text"/>	<input type="text" value="REDACTED"/>

(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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text" value="H7"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

Please see paragraphs 3.68 to 3.70 of our supporting statement.

(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 see paragraphs 3.68 to 3.70 of our supporting statement.

(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, 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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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.

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Representation Form for Local Plans



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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"/>	<input type="text" value="Mrs"/>
First Name	<input type="text"/>	<input type="text" value="Fiona"/>
Last Name	<input type="text"/>	<input type="text" value="Lee-McQueen"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Rosconn Group"/>	<input type="text" value="Turley"/>
Address Line 1	<input type="text"/>	<input type="text" value="[REDACTED]"/>
Line 2	<input type="text"/>	<input type="text" value="[REDACTED]"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="[REDACTED]"/>
Telephone Number	<input type="text"/>	<input type="text" value="[REDACTED]"/>
E-mail Address	<input type="text"/>	<input type="text" value="[REDACTED]"/>

(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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	I1	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

Please see paragraphs 3.76 to 3.77 of our supporting statement.

(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.

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Yes, I wish to participate in hearing session(s)

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Part A

1. Personal Details*

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2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mrs"/>
First Name	<input type="text"/>	<input type="text" value="Fiona"/>
Last Name	<input type="text"/>	<input type="text" value="Lee-McQueen"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Rosconn Group"/>	<input type="text" value="Turley"/>
Address Line 1	<input type="text"/>	<input type="text" value="[REDACTED]"/>
Line 2	<input type="text"/>	<input type="text" value="[REDACTED]"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="[REDACTED]"/>
Telephone Number	<input type="text"/>	<input type="text" value="[REDACTED]"/>
E-mail Address	<input type="text"/>	<input type="text" value="[REDACTED]"/>

(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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text" value="14"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

Please see paragraphs 3.78 to 3.80 of our supporting statement.

(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 see paragraphs 3.78 to 3.80 of our supporting statement.

(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)

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:

Seeking to make a change or an addendum to the Plan.

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.

n/a

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Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official
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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.*

Title

Mrs

First Name

Fiona

Last Name

Lee-McQueen

Job Title
(where relevant)

Director

Organisation
(where relevant)

Turley

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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	S1	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

Please see paragraphs 3.1 to 3.5 of our supporting statement.

(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.

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

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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"/>	<input type="text" value="Mrs"/>
First Name	<input type="text"/>	<input type="text" value="Fiona"/>
Last Name	<input type="text"/>	<input type="text" value="Lee-McQueen"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Rosconn Group"/>	<input type="text" value="Turley"/>
Address Line 1	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address	<input type="text"/>	<input type="text" value="REDACTED"/>

(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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	S2	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

Please see paragraphs 3.6 to 3.23 of our supporting statement.

(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 see paragraphs 3.6 to 3.23 of our supporting statement.

(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, 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:

Seeking to make a change or an addendum to the Plan.

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Representation Form for Local Plans



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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"/>	<input type="text" value="Mrs"/>
First Name	<input type="text"/>	<input type="text" value="Fiona"/>
Last Name	<input type="text"/>	<input type="text" value="Lee-McQueen"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Rosconn Group"/>	<input type="text" value="Turley"/>
Address Line 1	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address	<input type="text"/>	<input type="text" value="REDACTED"/>

(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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text" value="S6"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

Please see paragraphs 3.24 to 3.40 of our supporting statement.

(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 see paragraphs 3.24 to 3.40 of our supporting statement.

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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)?

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Yes, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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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.

n/a

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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"/>	<input type="text" value="Mrs"/>
First Name	<input type="text"/>	<input type="text" value="Fiona"/>
Last Name	<input type="text"/>	<input type="text" value="Lee-McQueen"/>
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Address Line 1	<input type="text"/>	<input type="text" value="REDACTED"/>
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Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address	<input type="text"/>	<input type="text" value="REDACTED"/>

(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?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text" value="W2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

Please see paragraphs 3.71 to 3.73 of our supporting statement.

(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 see paragraphs 3.71 to 3.73 of our supporting statement.

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