Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	**Ref:** **(For official use only)**

Name of the Local Plan to which this representation relates: Rugby Borough Council Proposed Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026 By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation in the subject line, OR by post to**: Development Strategy, Town Hall, Evreux Way, Rugby, CV21 2RR.

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*		2. Agent's Details (if applicable)
Title	MR	
First Name	JOHN	
Last Name	RUSSELL	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2	[redacted]	
Line 3	[redacted]	
Line 4		
Post Code	[redacted]	
Telephone Number	[redacted]	
E-mail Address (where relevant)	[redacted]	

**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.*

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

Name or Organisation:

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

Paragraph		Policy	CL2	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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

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.

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

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

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

No	**No**, I do not wish to participate in hearing session(s)		**Yes**, I wish to participate in hearing session(s)

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

Name or Organisation:

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

Paragraph		Policy	CL1	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
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Climate change section of the emerging Local Plan is not sound because it is not consistent with the National Planning Policy Framework. Policy CL1 should also address the 'location' of development to ensure that new housing seeks to maximise walking and cycling (the most sustainable modes of travel) alongside good access to public transport in accordance with the National Planning Policy Framework.

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

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

Name or Organisation:

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

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

4. Do you consider the Local Plan:

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

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Although mostly sound. Design policies D1 to D5 that seek to improve design quality are welcome.
However the scale of development proposed for Wolvey, a 60% increase in village size would harm local character, rural setting and built form.

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

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

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

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

Name or Organisation:

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

Paragraph		Policy	EN2	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
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Allocations proposed in the emerging Local Plan do not reflect the available evidence in terms of impacts on the landscape. In particular the site at Land north of B4109. Previous evidence indicated that the site had 'High sensitivity to housing development' in landscape terms. The allocation at Land north of B4109 would extend the village substantially towards the River Anker along the valley slopes. This would have a large impact on the character of the village.

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

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

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

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First Name	JOHN	
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Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[redacted]	
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Name or Organisation:

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

Paragraph		Policy	I4	Policies Map	
Site ID	309 & 358				

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(2) is Sound	Yes		No	No
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The scale of development proposed for the village of Wolvey is not capable of being supported by the available infrastructure.

Important areas of infrastructure that are lacking include:

- The primary school which near capacity and cannot accommodate another 70 pupils.
- There are no secondary or special education needs school in Wolvey requiring long journeys.
- The GP practice is only open on limited days (and only for part of the day) requiring long journeys
- The shop is small and not suitable for a weekly shop – requiring long journeys
- Public transport is poor
- There is no dentist, chemist or hospital – requiring long journeys
- Improvements would be unlikely as a result of new development.

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The proposed housing sites should be removed from the draft plan because it has not been justified that the available infrastructure can accommodate them. There are better options close to the Urban Areas of Rugby and Coventry that have better services and facilities which are more easily accessible.

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

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Name or Organisation:

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

Paragraph		Policy	S1	Policies Map	
Site ID	309 & 358				

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I consider Policy S1 to be unsound in that it is not 'justified' by the supporting evidence. The Rugby Urban Area should accommodate the majority of new growth not the less well-served and remote rural areas. The 'Main Rural Settlements' definition is not sound - Wolvey is the smallest and least well-served of all the Rural Villages yet has the third highest housing allocation. This will lead to increased Traffic and is not sustainable.
This will lead to high car dependency, as Wolvey has little public transport

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

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It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I believe Wolvey should be in a lower category in the hierarchy because of its limited services, facilities, employment and public transport.

It is a small remote village unable to accommodate the level of growth proposed.

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Name or Organisation:

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

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Policy S2 I consider not to be sound because it provides the basis for an unsustainable pattern of development that is not 'justified' by the evidence. The policy does not reflect the overall preferred strategy of Urban Concentration – it proposes nearly 58% of new allocations are over and above those in previous Local Plans and already with permission in the rural areas.

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

I consider more growth should be directed to the Urban Areas around Rugby and Coventry with a reduction in Wolvey and other remote rural areas. There are potential alternatives that are superior in terms of their strategic locations and sustainability

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0Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	**Ref:** **(For official use only)**

Name of the Local Plan to which this representation relates: Rugby Borough Council Proposed Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026 By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation in the subject line, OR by post to**: Development Strategy, Town Hall, Evreux Way, Rugby, CV21 2RR.

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*		2. Agent's Details (if applicable)
Title	MR	
First Name	JOHN	
Last Name	RUSSELL	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[redacted]	
Line 2	[redacted]	
Line 3		
Line 4		
Post Code	[redacted]	
Telephone Number	[redacted]	
E-mail Address (where relevant)	[redacted]	

**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.*

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

Name or Organisation:

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

Paragraph		Policy	S5	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
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.

The Draft Local Plan seeks to allocate some 1,500 new homes on land that would need to be released from the established Green Belt. This does not 'protect' Green Belt.

There are development options outside of the Green Belt that should be explored.
The Council's evidence is contrived and seeks to identify large areas of Green Belt as 'Grey belt' – these areas are needed to safeguard the countryside from encroachment

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.

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

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

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*
After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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

No	**No**, I do not wish to participate in hearing session(s)		**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

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Title	MR	
First Name	JOHN	
Last Name	RUSSELL	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[redacted]	
Line 2	[redacted]	
Line 3		
Line 4		
Post Code	[redacted]	
Telephone Number	[redacted]	
E-mail Address	[redacted]	

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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?

Paragraph		Policy	S6	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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

- 150 new homes are of a disproportionate scale with the current village.
- The proposed allocation is within the Green Belt – contrary to Government Policy.
- Previous landscape studies have indicated that the land has 'High sensitivity to housing development'. It is therefore not suitable.
- Part of the site abuts a Local Wildlife Site. There has not been a sufficient assessment of the ecological impacts.
- 150 homes (and up to 210 homes) is too much for Wolvey's infrastructure in terms of pressure on: the primary school, travel to secondary school, GP practice, and the very limited public transport availability.
- The Council's own Sustainability Appraisal indicates that "Wolvey is a notably small main rural settlement with a low settlement score".

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 consider this proposal.
Policy S6 should delete the proposed allocation of 150 homes at 'land north of B4109, Wolvey'. Alternative sites should be considered in strategically preferable locations (such as adjacent to the urban areas of Rugby and/or Coventry)

(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	**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.

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Title	MR	
First Name	JOHN	
Last Name	RUSSELL	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[redacted]	
Line 2	[redacted]	
Line 3		
Line 4		
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?

Paragraph	PP138	Policy		Policies Map	
Site ID	309				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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

- 150 new homes are of a disproportionate scale with the current village.
- The proposed allocation is within the Green Belt – contrary to Government Policy.
- Previous landscape studies have indicated that the land has 'High sensitivity to housing development'. It is therefore not suitable.
- Part of the site abuts a Local Wildlife Site. There has not been a sufficient assessment of the ecological impacts.
- 150 homes (and up to 210 homes) is too much for Wolvey's infrastructure in terms of pressure on: the primary school, travel to secondary school, GP practice, and the very limited public transport availability.
- The Council's own Sustainability Appraisal indicates that "Wolvey is a notably small main rural settlement with a low settlement score".

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

Site 309 should be deleted as a proposed allocation of 150 homes at 'land north of B4109, Wolvey'.

Alternative sites should be considered in strategically preferable locations, such as adjacent to the urban areas of Rugby and/ or Coventry.

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

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

No	**No**, I do not wish to participate in hearing session(s)		**Yes**, I wish to participate in hearing session(s)

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Last Name	RUSSELL	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[redacted]	
Line 2	[redacted]	
Line 3		
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Post Code	[redacted]	
Telephone Number	[redacted]	
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Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation:

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

Paragraph	PP137	Policy		Policies Map	
Site ID	358				

4. Do you consider the Local Plan:

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

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Land at Coventry Road, Wolvey, should not be allocated for housing for reasons set out below:

- The proposed allocation is within the Green Belt – contrary to Government Policy.
- The Council's own Sustainability Appraisal indicates that "Wolvey is a notably small main rural settlement with a low settlement score".

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

Site 358 should be deleted as a proposed allocation of 60 homes at 'Land at Coventry Road, Wolvey'.

Alternative sites should be considered in strategically preferable locations, such as adjacent to the urban areas of Rugby and/or Coventry.

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

No	**No**, I do not wish to participate in hearing session(s)		**Yes**, I wish to participate in hearing session(s)

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