

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)

**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	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Clare"/>	<input type="text"/>
Last Name	<input type="text" value="Malyon"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Clerk"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Wolston Parish Council"/>	<input type="text"/>
Address Line 1	<input type="text" value="Baptist Church"/>	<input type="text"/>
Line 2	<input type="text" value="2 Main street"/>	<input type="text"/>
Line 3	<input type="text" value="Wolston"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="CV8 3HJ"/>	<input type="text"/>
Telephone Number	<input type="text" value=""/>	<input type="text"/>
E-mail Address	<input type="text" value="clerk@wolstonparishcouncil.gov.uk"/>	<input type="text"/>

(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"/>	Policies Map	<input type="text"/>
Site ID	39				

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	x
(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.

The land at Dyers Lane, Wolston, should not be allocated for housing for reasons set out below:

- The proposed allocation is within the Green Belt – contrary to Government Policy.
- The following policies do not seem justified or consistent with National Policy

EN7- Flood Risk- Policy EN7 is welcome as this aligns with national policy and seeks to reduce overall flood risk.

The Storm Henk flood event in January 2024 saw 19 properties internally flooded and 11 properties externally flooded in the village. The subsequent S19 report acknowledged that a development site under construction at the time had not yet connected the surface water drainage system to the site wide attenuation basin therefore any flows originating on the site were not attenuated within the site boundary and therefore ran off site and down to the centre of the village.

EN2- Landscape protection- Allocations proposed in the emerging Local Plan do not reflect the available evidence in terms of impacts on the landscape. Site 39- Land on Dyers Lane, Wolston. Previous evidence indicated that the site had 'High sensitivity to housing development' in landscape terms.

EN1-Biodiversity and Geodiversity protection- A proportionate ecological assessment should have been undertaken

I4- Infrastructure and planning obligations- The scale of development proposed for the village of Wolston is not capable of being supported by the available infrastructure. Important areas of infrastructure that are lacking include:

- The primary school which is near capacity and cannot accommodate an additional influx of pupils.
 - The GP practice is only open on limited hours (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 or hospital – requiring long journeys
- Improvements would be unlikely because of new development.

S1- Settlement hierarchy- Policy S1 is unsound in that it is not 'justified' by the supporting evidence. The Rugby Urban Area should accommodate most of the new growth not the less well-served and remote rural areas.

S2- Strategy for homes- More growth should be directed to the Urban Areas around Rugby and Coventry with a reduction in Wolston and other remote rural areas. There are potential alternatives that are superior in terms of their strategic locations and sustainability. E.g. Rugby Town Centre

(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.

EN7- Flooding- No development should be progressed until the LLFAs have given reassurance that all flood risks following the flood events of 2024 and 2025 have been effectively mitigated in line with the national policy that requires any development to be made safe for its lifetime without increasing flood risk elsewhere.

EN2- Landscape Protection- The potential landscape impacts mean that Site 39- Land on Dyers Lane, Wolston should be removed from the plan as a proposed allocation.

EN1-Biodiversity and Geodiversity protection -Site 39- Land on Dyers Lane, Wolston should be removed from the plan as a proposed allocation.

I4- Infrastructure and planning obligations- The proposed housing site 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.

S1- Settlement hierarchy- Wolston should not be considered due to its limited services, facilities, employment and public transport.

- It is a village unable to accommodate the level of growth proposed.
- The Primary school has limited capacity and lacks the ability to extend on the current premises.

S2- Strategy for homes- More growth should be directed to the Urban Areas around Rugby and Coventry with a reduction in Wolston and other remote rural areas. There are potential alternatives that are superior in terms of their strategic locations and sustainability. E.g. Rugby Town Centre

(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:

It is the Parish Council's request that it be represented to provide substantial evidence of public discord against the proposed submission. It is intended that Cllr L Wright or A. Nother be able to present this to the inspector. This may be dependent on upcoming elections, and the council requests the right to have a representative at the meeting.

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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The Rugby Borough Council Privacy Notice for Development Strategy is available here:

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

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Part A

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2. Agent's Details (if applicable)

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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"/>	Policies Map	<input type="text"/>
Site ID	136				

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	x
(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.

The land at North of Warwick Road, Wolston, should not be allocated for housing for reasons set out below:

- The following policies do not seem justified or consistent with National Policy

EN7- Flood Risk- Policy EN7 is welcome as this aligns with national policy and seeks to reduce overall flood risk.

The Storm Henk flood event in January 2024 saw 19 properties internally flooded and 11 properties externally flooded in the village. The subsequent S19 report acknowledged that a development site under construction at the time had not yet connected the surface water drainage system to the site wide attenuation basin therefore any flows originating on the site were not attenuated within the site boundary and therefore ran off site and down to the centre of the village.

EN2- Landscape protection- Allocations proposed in the emerging Local Plan do not reflect the available evidence in terms of impacts on the landscape. Site 136- Land on Dyers Lane, Wolston. Previous evidence indicated that the site had 'High sensitivity to housing development' in landscape terms.

EN1-Biodiversity and Geodiversity protection- A proportionate ecological assessment should have been undertaken

I4- Infrastructure and planning obligations- The scale of development proposed for the village of Wolston is not capable of being supported by the available infrastructure. Important areas of infrastructure that are lacking include:

- The primary school which is near capacity and cannot accommodate an additional influx of pupils.

- The GP practice is only open on limited hours (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 or hospital – requiring long journeys
- Improvements would be unlikely because of new development.

I1-Transport- Wolston is a remote village with modest accessibility and poorly served by public transport.

- The proposed new homes are remote from urban areas with shops, jobs, leisure and medical facilities. Wolston has very limited services and facilities meaning car travel is essential.

There is a very limited bus service that connect Wolston to Rugby and Coventry and none to Leamington Spa.

S1- Settlement hierarchy- Policy S1 is unsound in that it is not 'justified' by the supporting evidence. The Rugby Urban Area should accommodate most of the new growth not the less well-served and remote rural areas. Specialist housing for over 55's is not 'Justified' by evidence and does not consider poor transport links to main hospitals along with a lack of district care and limited GP opening hours.

S2- Strategy for homes- More growth should be directed to the Urban Areas around Rugby and Coventry with a reduction in Wolston and other remote rural areas. There are potential alternatives that are superior in terms of their strategic locations and sustainability. E.g. Rugby Town Centre

S5- Countryside protection- 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

S6- Residential allocations- Land north of Warwick Road, Wolston should not be allocated for housing for reasons set out below:

- 80 new homes are disproportionate of 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.
- The submission of 80 homes (and up to 95 homes) is too much for Wolston's infrastructure in terms of pressure on: the primary school, travel to secondary school, GP practice, lack of parking and the very limited public transport availability.
- The Council's own Sustainability Appraisal indicates that "Wolston is a notably small main rural settlement with a high 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.

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EN2- Landscape Protection- The potential landscape impacts mean that Site 136- Land on Dyers Lane, Wolston should be removed from the plan as a proposed allocation.

EN1-Biodiversity and Geodiversity protection -Site 136- Land on Dyers Lane, Wolston should be removed from the plan as a proposed allocation.

I4- Infrastructure and planning obligations- The proposed housing site 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.

S1- Settlement hierarchy- Wolston should not be considered due to its limited services, facilities, employment and public transport.

- It is a village unable to accommodate the level of growth proposed.
- The Primary school has limited capacity and lacks the ability to extend on the current premises.
- The suggested over 55s Accommodation is neither affordable nor Social. This means that older residents in the village are less likely to be able to access it.

S2- Strategy for homes- More growth should be directed to the Urban Areas around Rugby and Coventry with a reduction in Wolston and other remote rural areas.

There are potential alternatives that are superior in terms of their strategic locations and sustainability. E.g. Rugby Town Centre

S5- Countryside protection- Allocations and designations should follow the National Planning Policy Framework and only allow changes to the Green Belt in exceptional cases. The development proposed at site 136 is not dissimilar to that proposed in planning application R19/0167, which was refused in line with the then current NPPF guidance, i.e., it constituted inappropriate development within the Green Belt due to the detrimental impact on the openness of the area by virtue of the extent of potential built form that would be provided.

S6- Residential allocations- Policy S6 should delete the proposed allocation of 80 new homes at 'land north of Warwick Road, Wolston and 15 homes at Dyers Lane, Wolston Alternative sites should be considered in strategically preferable locations (such as adjacent to the urban areas of Rugby and/or Coventry)

I1-Transport- Specialist housing sites should be removed from the Local Plan because Wolston does not have good access to higher level services and facilities and poor public transport.

There are better options close to the Urban Areas of Rugby and Coventry that should be considered first. Rugby has better services, facilities and employment opportunities and public transport.

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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