

## 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 13<sup>th</sup> March 2026**  
**By email to:** [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) with **Proposed Submission Consultation in the subject line, OR by post to:** Development Strategy, Town Hall, Evreux Way, Rugby, CV21 2RR.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

#### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*

#### 2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Wolvey Parish Council"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="CL1 to CL4"/>	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" value="✓"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
(3) complies with the Duty to co-operate	Yes	<input type="text" value="✓"/>	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 Climate change section of the emerging Local Plan is not sound because it is not consistent with the National Planning Policy Framework.

The Climate Change policies only consider the contribution that 'Net zero buildings' and 'Renewable energy and low carbon technology' make to addressing the causes of climate change. The policies do not fully address some of the key causes of climate change and CO2 emissions, namely the 'location' of development, and ensuring that growth seeks to maximise walking and cycling (the most sustainable modes of travel) alongside good access to public transport.

Paragraph 164 of the NPPF states (in the context of Climate Change):

*"New development should be planned for in ways that:.....*

*b) help to reduce greenhouse gas emissions, such as through its **location**, orientation, and design....."*

Locations that seek to minimise vehicular movements (and consequently CO2 emissions and other pollutants) will have substantial climate change benefits. The Local Plan's over-reliance on dispersal to more remote and inaccessible sites in the Green Belt will increase the propensity for private car movements to the detriment of climate change objectives.

Paragraph 110 of the NPPF clearly sets out the Government's expectations in relation to the location of growth in the context of transport and climate change. It states:

*"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."*

The Local Plan is potentially unsound in that it is potentially inconsistent with the NPPF.

(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.

Wolvey Parish Council are seeking an additional Climate Change policy that sets out the Borough Council's aspirations for locating growth in sustainable locations as a way of minimising the contributions that private car travel makes. This would potentially help to set a framework which seeks to address the adverse impacts on climate change. This approach should then be reflected in the choices made for the locating new residential growth. Locating growth in the most sustainable locations is normal custom and practice in plan making.

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

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**No**, I do not 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	<input type="text"/>	Policy	<input type="text" value="CL2"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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Wolvey Parish Council support draft policy CL2 insofar as it considers some renewable energy and low carbon energy development to be inappropriate development in the Green Belt.

Criterion F of draft policy CL2 is supported insofar as it is important that renewable and low carbon energy development should have local community involvement and leadership.

Wolvey Parish Council recognise the contribution that renewable energy and low carbon energy production can make to minimising the impacts of climate change, but these should not be at the expense of the quality of the countryside.

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

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

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Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="D1 to D5"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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Wolvey Parish Council broadly support Design policies D1 to D5. Policies that seek to improve design quality, local distinctiveness and protecting the character of settlements are welcomed.

Policy D1 does not, however, appear to be reflected in the scale of development proposed for many of the rural villages (particularly Wolvey) where substantial growth (of some 60% at Wolvey) is being proposed which would inevitably have a harmful impact on local character, rural setting and built form of the village.

In the context of Draft policy D4, Wolvey Parish Council fully support a policy that seeks to protect Heritage Assets and their settings.

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

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The potential impacts of site 309 on the character of Wolvey: it's urban form, distinctive landscape setting and rural context needed to have been fully considered to assess whether the site was suitable to have been proposed as an allocation.

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

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Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="EN1"/>	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" value="✓"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
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Wolvey Parish Council support policies that seek to protect designated and non-designated wildlife sites (Policy EN1.c). It is notable that proposed allocation site 309 (Land north of B4109, Wolvey) is adjacent to an existing Local Wildlife site.

The site, and potential ecological impacts of development on it, are not specifically considered in the Council's 'Ecological Constraints Assessment Rugby Borough Council' (October 2025) document. Given that policy EN1 seeks to protect 'Local Wildlife Sites' a proportionate ecological assessment should have been undertaken.

It is also notable that previous representations from the Local Wildlife Trust have raised concerns about the potential residential development of this site.

Warwickshire Wildlife Trust's representations state that:

*"We are particularly concerned regarding a number of the housing/employment allocations such as an allocation south of Leicester Road, directly next to Wolvey Wetlands Reserve and Local Wildlife Site near Wolvey right adjacent to the river Ankor habitat an important blue corridor for a number of protected and important species as well as Wolvey Rush Pasture PLWS and Wolvey Trout Pits PLWS.*

*....As well as an allocation for 150 homes at Wolvey near to Wolvey Trout Pits PLWS another key wildlife site in Warwickshire. Which should have considered alternatives sites in the Sustainability Appraisal."*

Given these specific concerns, expressed by an independent, suitably qualified and experienced organisation, it would have been appropriate for Rugby Borough Council to have fully assessed ecological impacts of site 309 on a nearby ecologically important site in more detail. No convincing evidence has been provided that confirms whether the proposed allocations would result in harm to these sites or any justification for development outweighing this harm.

Given this, policy EN1 could potentially be unsound (on the grounds of not being 'justified') on account of insufficient ecological evidence being provided to support the proposed allocation of site 309 which is adjacent a Local Wildlife Site and abuts the River Anker (blue infrastructure).

Draft Policy EN1 could also go further and seek to protect areas of Best and Most Versatile (BMV) agricultural land, particularly in remote rural areas. This would be consistent with National Policy and help to protect a valuable resource. It is worthy of note that much of Wolvey and Wolvey Heath contains grade 2 agricultural land. Further research would be required to identify if other land falls within classification 3a (BMV).

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

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The potential ecological impacts of site 309 need to be robustly considered to assess whether the site was suitable to have been proposed as an allocation.

(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	<input type="text"/>	Policy	<input type="text" value="EN2"/>	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" value="✓"/>	No	<input type="text"/>
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Wolvey Parish Council fully support policy EN2 that seeks to protect important landscapes.

Wolvey Parish Council consider that the policy could be unsound as drafted because it is not 'justified'. This is primarily on the grounds that allocations proposed in the emerging Local Plan do not reflect the available landscape evidence. The policy clearly states that:

*"Development shall avoid significant adverse impacts on landscape character and significant adverse visual impacts."*

Previous independent landscape evidence carried out on behalf of the Borough Council in 2016 indicated that site 309, Land north of B4109, Wolvey, (now promoted for residential development in the emerging plan) was in an area which had 'High sensitivity to housing development' in landscape terms.

If emerging policy EN2 were followed, the proposed allocation of site 309 would not be justified based on the evidence available because of the potential adverse impact on a 'Highly sensitive' landscape. The LPA belatedly commissioned additional evidence in 2025 that indicated the landscape was now of 'low to medium' sensitivity. This re-assessment is incomprehensible to the layman and the Parishioners of Wolvey. The landscape has not changed between the production of the two studies, nor has there been any material development that would impact the landscape setting.

If the later evidence has been developed to suit the LPAs desire to allocate more land at Wolvey by 'downgrading' the landscape value, this would be disingenuous and inexplicable. It is not reflected by the situation on the ground. As recognised by previous landscape evidence, site 309 is situated atop a ridge / plateau above the River Anker Valley (and an unnamed watercourse) which runs to the north and west of the site in shallow valleys below the village.

Views of Wolvey from the west (along Bulkington Road) are characterised by housing on top of a plateau. Development only extends down the slope towards the river and adjacent pools to a modest extent. The proposed allocations at site 309 would extend growth substantially towards the watercourses along the valley slopes. This would have a substantial impact on the character of the village and its urban form when viewed from multiple public areas. This is something that previous landscape sensitivity assessments have identified but appears to have been overlooked in more recent evidence.

The previous Landscape Sensitivity Assessment was only carried out in 2016 and stated (in relation to site 309 and the wider area):

***"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."***

Parts B and C of policy EN2 indicate that:

*"Development proposals must be located and designed to respect scenic quality and maintain a distinctive sense of place"*

and that,

*"Development proposals must avoid detrimental impacts on landscape features which make a significant contribution to the character of the area or to the setting of a heritage asset or settlement."*

This appears to be a rational approach. However, it is not reflected in the proposed allocations.

In summary, landscape protection policy EN2 is supported but should have been logically applied in the site selection process.

Given this, policy EN2 could potentially be unsound (on the grounds of not being 'justified') on account of conflicting and spurious evidence being provided to support the proposed housing allocation of site 309, which, is on land previously identified as being of 'high sensitivity'.

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

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

Site 309 should be removed as a proposed housing allocation because it is not consistent with emerging policy EN2 which seeks to protect important landscapes.

(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"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Wolvey Parish Council"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="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" value="✓"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
(3) complies with the Duty to co-operate	Yes	<input type="text" value="✓"/>	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 availability of 'infrastructure' should be a key consideration in determining suitable locations for new housing allocations. Strong transport infrastructure is essential, particularly availability of a choice of sustainable transport modes (public transport, walking and cycling) and a transport network that has capacity and is safe.

Wolvey Parish Council fully support draft Policy I1(A) which states that development should be designed in accordance with the 'transport user hierarchy' which prioritises active travel (walking and cycling) over private car use.

Draft Policy I1(B) is also supported insofar as it seeks to locate development where:

- car travel can be minimised and maximise opportunities for walking, cycling and public transport;
- safe and convenient active travel routes can be provided within and connecting out from the development (including upgrading or creating new routes);
- it provides convenient access to public transport; and
- direct, clear, safe, and convenient walking links can be provided to existing and proposed local facilities.

The emerging policy is logical and entirely consistent with the NPPF in relation to the location of growth. However, the approach to locating growth that the Local Plan subsequently adopts is one of 'dispersal' to more remote, less accessible and

more poorly served settlements with only modest transport choice. This includes some 210 new homes at Wolvey and 325 at Brinklow, both of which are remote from urban areas, have limited services and facilities and modest public transport solutions. New residential development in these locations would inevitably result in increased reliance on private car use (primarily because of the paucity of public transport options and remoteness of Wolvey and Brinklow villages from employment opportunities and key services and facilities).

Evidence from Sustrans and the Chartered Institution of Highways and Transportation (CIHT) suggest that walking distances of 800 metres and cycling distances of 3 kilometres are generally considered acceptable thresholds where people will use sustainable modes (walking and cycling) to access services. It is important to note that there are no substantial employment, major retailing (convenience and comparison), hospitals, secondary schools, or commercial leisure opportunities in Wolvey, or nearby, that are within these walking and cycling distances and which could be accessed sustainably. This would necessitate increased private car use.

The NPPF is clear that development should be located where 'sustainable' modes of travel (walking and cycling) can be accessed. It is unrealistic to suggest that a significant proportion of residents from the proposed new allocations would walk or cycle to the nearest well-served towns of Nuneaton (5.8 miles away) and Hinckley (4.7 miles away). There are no direct public footpaths or cycle lanes and access by bicycle to these destinations would be along busy, fast, and dangerous classified roads. Access to the nearest main town centre at Hinckley involves crossing a traffic island at the junction of two trunk roads the A5 and M69.

The nearest major employment sites are at Sketchley Industrial Estate (Hinckley) which is four miles by road, and North Coventry (M6 junction 2) which is five miles by road. It is unrealistic to assume substantial sustainable travel from the proposed developments to these employment opportunities.

There are very limited public transport services that connect Wolvey to higher order centres. The '74 bus service' runs six journeys per day to Nuneaton and Coventry. The 74 bus service involves a lengthy circuitous route, it is infrequent and does not operate on Sundays and evenings. The frequency of service and lengthy journey times do not encourage modal shift towards bus use. There are no firm commitments identified in the Local Plan or supporting evidence from the bus operators to enhance the service. Financial contributions from developers would not necessarily result in a long-term improvement to the frequency and number of services (given that it serves several settlements). Financial transport contributions would also add to viability challenges – which do not appear to have been specifically assessed for Wolvey.

In summary, the policy approach of prioritising sustainable travel is supported. However, this is not reflected in the choice of substantial allocations being promoted in the rural areas, including Wolvey. It would be more appropriate to encourage growth in the more sustainable locations close to the town of Rugby or East Coventry. These locations have a greater prospect of new residents walking and cycling to services and facilities and have a better public transport offer.

In summary, policy I1 (A&B) could potentially be unsound (on the grounds of it not being 'justified') because the evidence suggests that Wolvey is not a sustainable settlement in terms of its access to sustainable transport choice. It is remote from higher order services and facilities, and substantial growth would result in reliance on private car use. This conflicts with the objectives of the NPPF and therefore does not meet with this test of soundness.

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

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Site 309 should be removed as a proposed housing allocation because it is not consistent with emerging policy I1 which seeks to locate development in areas that can access services and facilities using sustainable transport modes.

Options that are better related to the Urban Areas should be pursued. These include potential options adjacent to the main urban area of Rugby (such as Cosford) which are able to access the substantial services, facilities and employment opportunities offered by Rugby, alongside its superior public transport offer.

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

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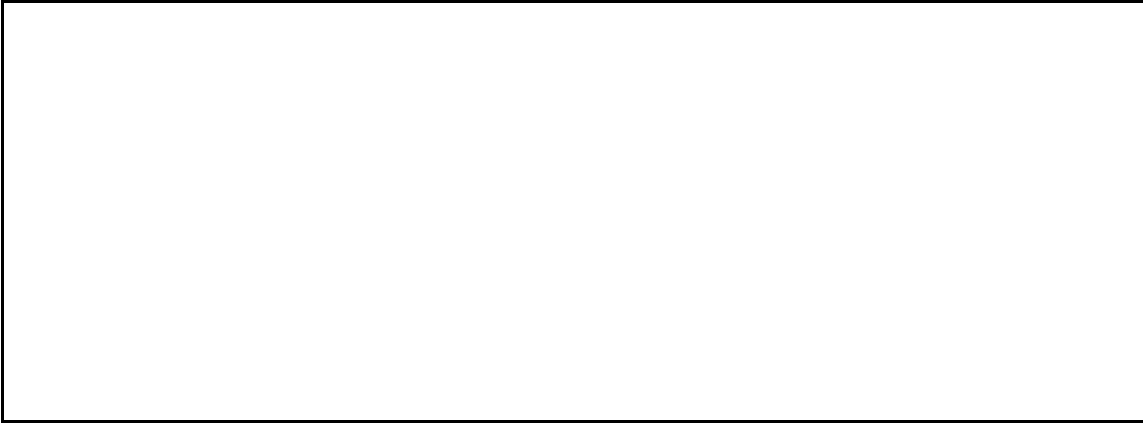
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Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Wolvey Parish Council"/>	<input type="text"/>
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Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="I4"/>	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" value="✓"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
(3) complies with the Duty to co-operate	Yes	<input type="text" value="✓"/>	No	<input type="text"/>

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Wolvey Parish Council support the principles contained in Draft Policy I4 (A) which seek to ensure that adequate existing, new or improved infrastructure is in place to support new development and that development will be unacceptable where impacts cannot be mitigated.

The scale of development proposed for the village of Wolvey is not capable of being supported by the currently available infrastructure. Wolvey Parish Council are concerned that the emerging policies do not fully clarify how the necessary new infrastructure would be provided viably in order to support new development.

Key areas of infrastructure that are of concern include:

### Primary schools

Wolvey currently has a 'One form entry' Primary School. The Council's evidence contained in the 'TOPIC PAPER: EDUCATION DECEMBER 2025' indicates that there are several years where Wolvey Primary School would have no available capacity in some year groups following growth.

Based on Warwickshire County Council's 'yield rates' of 0.34 for primary schools in Rugby Borough, there would be an increase of some 71 Primary School pupils resulting from the 210 additional proposed homes in Wolvey. It is accepted that not all of these would attend Wolvey School, but the evidence reinforces concerns about capacity. The nearest alternative primary school which would accommodate any 'overspill' is located in Bulkington (nearly three miles from Wolvey).

Transporting Primary School pupils would result in additional costs to the public purse and substantial implications for both sustainability and community cohesion.

### Secondary Schools

The nearest secondary school (and the most commonly attended by Wolvey residents) is Nicholas Chamberlaine School and VI Form in Bedworth. This is more than 4 miles away. Whilst there is some capacity available at present, there are substantial ongoing developments in Bulkington and Bedworth that will reduce available capacity. The Council's evidence contained in the 'TOPIC PAPER: EDUCATION DECEMBER 2025' does not address capacity issues at Nicholas Chamberlaine School. Whilst it is outside of Rugby Borough, It is still the main recipient of Wolvey's students so should be properly assessed in order to demonstrate available capacity.

The proposed new developments of some 210 new homes in Wolvey would result in some 34 additional secondary students (based on a yield rate of 0.16). There is a duty on Warwickshire County Council (the Local Education Authority) to fund secondary school transport to Nicholas Chamberlaine school (because it is more than three miles from the source of the housing). Warwickshire County Council have raised concerns about this on viability and sustainability grounds. Transportation costs will place additional financial burdens on the, already stretched, public purse as a result.

Other options closer to the Urban Area of Rugby are better placed to accommodate secondary students in a more cost effective and sustainable way through provision of new or expanded schools.

### Special Education Needs

The nearest Special Education Needs schools are in Nuneaton and Exhall (more than five miles away). Issues of accessibility similarly apply. There are two SEN schools and Multiple Secondary Schools in Rugby which seem the logical place to locate new development.

### GP Practice

The GP Surgery at Wolvey is part of the 'Burbage Surgery.' It has very restricted opening times, only Tuesday and Wednesday Morning (8.30am to 12.30pm) and Thursday afternoon (2pm to 6pm). This results in some difficulties in securing appointments outside of these times when travel to Burbage is necessary. The surgery has limited available capacity and there is no potential for the surgery to expand given its site constraints. It is also the case that, even if there were the land to expand, there is a very limited expectation that improved services would be delivered at the Wolvey site (given the scarcity of GP staff resources and available finances).

There is no pharmacy or dentist in Wolvey.

### Retail Store

Wolvey currently has a small retail store selling a limited amount of convenience goods. The store also contains a post office.

Given the limited stock, most convenience shopping requires longer journeys to supermarkets in Hinckley, Coventry, Rugby and Nuneaton. This compounds unsustainable travel patterns given the remote nature of Wolvey Village. Locating

growth in the more sustainable Rugby Urban Area, with easier access to convenience and comparison stores, would be a more sustainable and logical solution to growth.

#### Waste water disposal

There are capacity constraints in the disposal of waste-water from Wolvey. High level discussions with Severn Trent Water have identified that the Wolvey sewage catchment area is served by a single pumping station, which does not have the capacity to accommodate substantial additional growth. This has implications for both viability and carbon emission increases through operating a pumping station.

There are no proposals to improve drainage facilities in Wolvey over the next 5 years as part of the Severn Trent Water Asset Management Plan (AMP8). This would inevitably fall to the developer to fund, with commensurate viability implications.

In summary, there would need to be substantial improvements to available infrastructure to support the large-scale growth proposed in Wolvey. This primarily relates to education, health, transport (including junction and link improvements and public transport), water and other utilities and other social and green infrastructure.

A very limited (generic) viability study is provided but no specific evidence relating to a bespoke Wolvey Infrastructure Delivery Plan. It is therefore unclear how and when infrastructure would be provided, who would pay for it and whether the proposal would be viable and deliverable.

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

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Site 309 should be removed as a proposed housing allocation because it has not been justified that the scale of growth could be accommodate in terms of its impact on, and ability to provide, infrastructure.

Options that are better related to the Urban Area should be pursued. There is a more substantial provision of social infrastructure within the Rugby Urban Area including: multiple secondary schools, a hospital, dentist practices, pharmacies, comparison and convenience retailing and commercial leisure – all of which are more accessible by sustainable transport modes.

Strategically preferable site options include Cosford, to the west of Rugby which has easy access to social infrastructure, retail and the employment opportunities offered by Rugby, alongside its superior public transport offer.

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

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First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title	<input type="text"/>	<input type="text"/>
(where relevant)		
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## Part B – Please use a separate sheet for each policy or site you wish to comment on

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Name or Organisation:

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

Paragraph	<input type="text" value="Objectives"/>	Policy	<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" value="✓"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
(3) complies with the Duty to co-operate	Yes	<input type="text" value="✓"/>	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.

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Wolvey Parish Council support the six proposed Objectives underpinning the Local Plan. The main concern is that the subsequent policies are not consistent with the proposed objectives. The following 'Objectives' are not followed in the policies of the emerging Plan:

Objective 1. Delivering growth in Sustainable Locations. The draft plan directs a disproportionate amount of new growth through dispersal to the less sustainable 'rural' locations. In particular Wolvey, which is the smallest, most remote and least sustainable of the 'Main rural villages' – yet has the third highest allocation of new housing. More sustainable options for deliverable growth close to the main Urban Area (such as west of Rugby at Cosford) appear to have been too easily dismissed.

Objective 3. The objective of reducing carbon emissions and adapting to Climate Change is supported. The subsequent strategic approach however, is of a dispersed distribution of substantial new growth to more remote rural areas. This undermines the climate change objective by promoting sites that are remote, have modest services and facilities, minimal employment opportunities and poor public transport, and are therefore reliant on private car use, with no realistic sustainable travel solutions. Wolvey is particularly vulnerable to car reliance given its modest availability of services and facilities, poor public transport, lack of employment opportunities, remote location and comparatively poor internet provision.

Objective 5. Delivering Infrastructure led growth. Delivering growth which is supported by available or realistically deliverable infrastructure is a sound plan-making approach. However, in the case of Wolvey village, and other Rural Centres, the Local Plan does not demonstrate that such infrastructure is either available or deliverable. Wolvey is the lowest scoring of the Main Rural Village in terms of access to services and facilities (social infrastructure). Substantial infrastructure improvements would be needed to accommodate the proposed level of growth. Improvements would be required to: primary and secondary education provision (the latter needing transportation to a school some four miles away) at substantial cost; public transport; Primary health care (currently a satellite practice only operating on a part time basis); bus service provision (less than hourly on most days and not on Sundays or evenings). This does not appear to have been considered in any detail in the relevant policies or in the 'viability' evidence – which is generic in relation to rural settlements and does not consider the specific requirements of Wolvey's more remote location.

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

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Whilst the Local Plan's 'Objectives' appear sound and logical, there is a substantial disconnect between the Objectives and the subsequent policies and allocations that they seek to guide. In order to make the plan sound the policies, proposals and designations should be amended so that they reflect the guiding objectives of sustainability, combatting climate change and infrastructure led development. In particular, the Local plan should focus on the more sustainable urban locations and reduce reliance on the more remote, less well-served rural areas.

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

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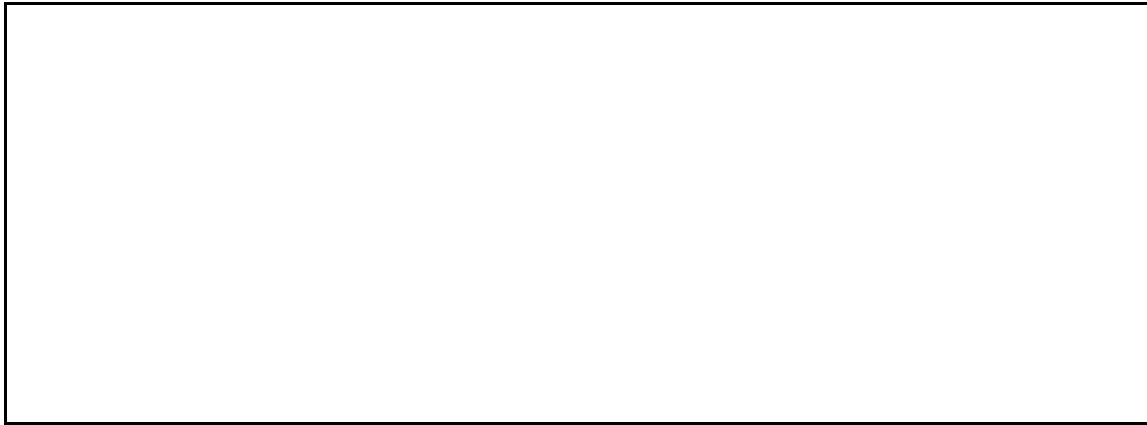
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Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Wolvey Parish Council"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="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" value="✓"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
(3) complies with the Duty to co-operate	Yes	<input type="text" value="✓"/>	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.

Policy S1 is considered to be unsound in that it is not 'justified' by the supporting evidence.

It is logical that the 'Rugby Urban Area' should top the settlement hierarchy and accommodate the vast majority of new growth. The Urban Area is the most sustainable location within the Borough. It contains all of the necessary services, facilities, transport choice and employment opportunities required to deliver truly sustainable growth.

The 'Main Rural Settlements' definition within S1 is not sound. There are nine 'Main Rural Settlements' defined in policy S1. These vary substantially in size (from 357 homes in Wolvey to 1,782 at Long Lawford) and varying access to available services, facilities, transport choice employment and infrastructure. They also vary in their remoteness and reliance on private car use – with Wolvey being the most remote from the Urban Area.

The Council's paper 'RUGBY BOROUGH COUNCIL RURAL SUSTAINABILITY STUDY DECEMBER 2024' sets out the evidence for a hierarchy of settlements based on their size and access to services and facilities. There is a clear distinction between the larger and better-served Main Rural Settlements and those (such as Wolvey) that are smaller, more remote and less sustainable in terms of access to services and facilities. Four of the named settlements (Long Lawford, Binley Woods, Wolston and Dunchurch) have populations over 1,000 (up to four times that of Wolvey) and score more favourably in terms of available services, public transport and internet provision. Three of these (Long Lawford, Binley Woods and

Dunchurch) are adjacent to the larger urban areas of Rugby and Coventry with the commensurate sustainability benefits.

Based on Rugby Council's own evidence, in the 'RURAL SUSTAINABILITY STUDY', it would be more logical to create a distinction between those larger rural settlements with better access to services and facilities and the smaller, less well-served remote villages. This distinction would reflect the greater ability of the larger rural settlements to accommodate more growth (sequentially after Rugby). The current policy gives all 'Main Rural Settlements' the same status which has been used as justification to give disproportionate housing requirements to some of the remote rural settlements, in particular Wolvey and Brinklow.

It is notable that Wolvey is the smallest and least well-served of all the Rural Villages yet has the third highest housing allocation (after Long Lawford and Brinklow). The hierarchy also fails to consider access to employment opportunities and some key services like secondary education, leisure opportunities and hospitals. It would be more logical that those larger settlements close to the Urban Areas of Rugby and Coventry (Long Lawford, Binley Woods and Dunchurch) accommodate more growth (designated as Main Rural Villages) with the remaining smaller settlements in more remote locates being designated 'Secondary' Rural villages to reflect their size, remoteness and lesser access to services, facilities, transport and employment opportunities.

Wolvey's limitations are recognised in the Council's own Sustainability Appraisal report which states that:

*"Wolvey is a notably small main rural settlement with a low settlement score (36) and is also notable on account of being located in the north of the Borough, linking much more strongly to Hinckley, Nuneaton and Coventry than to Rugby....."* (SA report para 5.4.89)

And in the context of transport limitations recognises that other options for growth are preferable. Para 5.4.94 of the Council's SA states:

*"Overall, the new proposed lower growth approach [for Wolvey] is supported, given the context of a reduced need to identify greenfield allocations, and given the greenfield options discussed above, including at Long Lawford where there is a much stronger case to be made for growth in transport and accessibility terms....."*

Whilst the SA recognises the strategic limitations of growth at Wolvey, allocations still propose nearly 60% growth in the settlement during the plan period. This is disproportionate and not supported by the available evidence.

The Council's 'RURAL SUSTAINABILITY STUDY' evidence that seeks to justify growth in Wolvey is insufficiently nuanced to provide a solid basis for identifying an additional 210 homes (60% growth) in the village during the plan period. The study methodology ascribes points to Wolvey for a GP practice, Convenience store and Primary School. It fails to recognise that: the GP practice is a satellite surgery which is only open on a part time basis; the convenience store is very small with modest stock and only suitable for very limited 'top-up' and emergency item shopping (and not a weekly grocery shop); and, the Primary School is a one form entry school which currently has little or no capacity.

The hierarchy policy S1 therefore needs to be more nuanced as it is currently unsound as it does not reflect the available evidence.

(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.

Policy S1 should be divided into four categories of hierarchy based on size, access to services and facilities and proximity to the main urban areas of Rugby and Coventry. Rugby should remain as the 'Main Urban Area'; Long Lawford, Binley Woods and Dunchurch should be identified as the 'Main rural settlements'; with Brinklow, Clifton on Dunsmore, Ryton on Dunsmore, Wolson and Wolvey being designated as 'Secondary Rural settlements' with the remainder being 'other rural settlements' with more limited growth. The subsequent policies (including quantum of growth) should then reflect this hierarchy with more development being distributed towards those higher in the hierarchy.

Notwithstanding this, Rugby should still be the main focus for growth and should accommodate substantially more new development than the rural areas. The Rugby Urban area currently comprises some two-thirds of the area's population and is by far the most sustainable location – yet is accommodating only some 30% of the proposed new housing allocations as set out in proposed policy S6.

(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)

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### Part A

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First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Wolvey Parish Council"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
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Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="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" value="✓"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
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Policy S2 is not sound because it provides the basis for subsequent policies that promote an unsustainable distribution of new development. Policy S2 is considered to be unsound in that it is not 'justified' by the supporting evidence.

Policy S2 sets out the housing requirements for the Borough of Rugby based on the Government's Standard method, with a flexibility allowance to accommodate slippage and non-delivery. The proposed level of growth seems acceptable.

Wolvey Parish Council support the proposed 15-year time horizon with anticipated adoption in 2027 as this reflects the preferred plan period in the National Planning Policy framework.

Wolvey Parish Council object to the distribution of new homes in policy S2 because it does not reflect the overall preferred strategy of Urban Concentration proposed in policy S1. Of the 11,729 homes identified in policy S2, some 7,993 are already allocated or existing commitments. The Council has identified some 850 windfall homes (which seems logical based on previous delivery evidence). Some of these windfall homes will be in the less sustainable rural areas. Of the remaining 2,886 homes being proposed, some 1,653 (57.3%) are in the rural areas. In summary, nearly 60% of the new housing development identified in the Local Plan is outside of the Urban area. This does not reflect the SA and other evidence that identifies the Urban area as the most sustainable location for growth. The distribution of growth will be more comprehensively considered in relation to Draft Policy S6.

Policy S2 could specifically identify new strategic growth in more sustainable locations close to the Rugby Urban area. Proposed developments, such as that at Cosford, appear to have been dismissed in favour of greater distribution to the less sustainable rural areas. Further development at Rugby appears to have been dismissed largely because of concerns about market saturation. However, some, of the sites, such as the proposed Cosford development, are geographically remote from other strategic sites and have other merits – including a single landowner who is supportive of delivering the necessary transport and social infrastructure in the short term.

(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.

Policy S2 could be amended to identify alternative (more sustainable) locations for future growth closer to the Urban area of Rugby. There are potential alternatives that are superior in terms of their strategic locations and sustainability. These include the proposed Cosford development to the west of Rugby which is a single land-ownership proposal, well-related to the Rugby Urban area. The Cosford site is deliverable in the short term (first delivery proposed within the five-year period). Substantial transport and other evidence has been gathered by the site promoters which demonstrates that the site is deliverable in the short term and could provide the necessary infrastructure.

There is a commitment on behalf of the Cosford owners and promoters to deliver a high-quality development. There are substantial benefits of having a single landowner with an interest in overseeing proposed strategic sites. There is increased potential to front-load infrastructure without immediate pressures to secure financial returns, therefore potentially resulting in early delivery of a school and transport infrastructure. These benefits support an allocation at Cosford rather than a rural dispersal approach. Other landowner promoted sites (such as Lubbesthorpe, Broadnook and Birstall developments) in Leicester and Leicestershire have proved to be high quality developments with strong delivery. They have defied the 'market saturation' argument.

It is accepted that the rural villages (including Wolvey) should accommodate a proportionate amount of new development, but not the substantial (c.60%) new growth proposed in policy S2.

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

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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"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Wolvey Parish Council"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="S5"/>	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" value="✓"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input type="text" value="✓"/>
(3) complies with the Duty to co-operate	Yes	<input type="text" value="✓"/>	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.

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Policy S5 sets out the strategic approach to Countryside protection. The policy is broadly supported by Wolvey Parish Council in that it seeks to protect the Green Belt in accordance with national policy. Notwithstanding this, policy S5 is not reflected in subsequent allocations which appear to favour new growth in mainly Green Belt areas around more rural villages.

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 includes 210 proposed new homes on some 9.5 hectares of Green Belt land at Wolvey.

Rugby Borough Council has produced a 'Green Belt Contribution Study Strategic Assessment' (October 2025) and a 'Green Belt Contribution Study Stage 2: Site Contribution Assessments' (December 2025) which identifies vast swathes of Green Belt land covering the majority of the Green Belt to the west of Rugby Borough which the studies consider could be identified as 'Grey Belt'. This follows changes to Government guidance in the NPPF 2025. It appears that the 'Grey Belt' evidence has been contrived to support the 'distribution' strategy proposed in the emerging plan. Many of the vast areas identified as 'Grey Belt' in the studies still perform the useful function of "assist[ing] in safeguarding the countryside from encroachment", as defined by paragraph 143 of the NPPF, and therefore should not be considered as Grey Belt.

It is, however, important to note that 'grey belt' designation does not override the need to deliver 'sustainable' locations for growth. Paragraph 148 of the NPPF is clear in this regard and states:

“However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate....”

Green Belt sites make up the majority of ‘new’ allocations (over and above those already completed, committed, and identified as allocations in the previous Local Plan). The reliance on new residential and employment allocations within the Green Belt appears contrary to the NPPF and therefore ‘unsound’ because of its conflict with national policy.

Wolvey Parish Council do not consider that sufficient credible evidence has been put forward to support why the Borough Council has chosen to pursue such a fundamental departure from established National Green Belt policy. Green Belt release should be the strategy of last resort and only used in exceptional circumstances.

(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.

Policy S5, as drafted, appears to be sound. However, the subsequent allocations and designations should follow the strategy contained in the policy which seeks to protect the Green Belt in accordance with national policy.

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

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First Name	<input type="text"/>	<input type="text"/>
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Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Wolvey Parish Council"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
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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	<input type="text"/>	Policy	S6 & Para 1.34	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
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Policy S6 sets out the proposed residential allocations which contribute towards meeting identified housing needs in Rugby Borough. Wolvey Parish Council objects broadly to the proposed allocations and specifically to one of the proposed allocations for Wolvey Village.

Wolvey Parish Council objects broadly to policy S6 because it is contrary to the Strategy set out in policy S1 of the emerging Local Plan, which seeks to direct new growth to the more sustainable location of the Rugby Urban Area. Despite this, some 57% of the newly allocated sites in the Local Plan are in the rural areas. This is not logical as it promotes the majority of new growth in less sustainable locations with fewer services, facilities, employment opportunities and transport choices.

Paragraph 1.34 states that 75% of growth is directed towards the Rugby Urban area. This is largely because of slower than expected delivery on strategic sites from the previous local plan. It does not justify skewed growth from new allocations (in draft Policy S6) towards the less sustainable rural areas. Many of which require substantial Green Belt releases. Policy S6 is therefore also contrary to emerging policy S5 which seeks to protect the Green Belt in accordance with National Government Policy.

### Site 309 - Land north of B4109, Wolvey

Wolvey Parish Council specifically objects to Policy S6 insofar as it seeks to allocate 150 homes at 'land north of B4109, Wolvey'. There are multiple reasons why Wolvey Parish Council object to this proposed allocation:

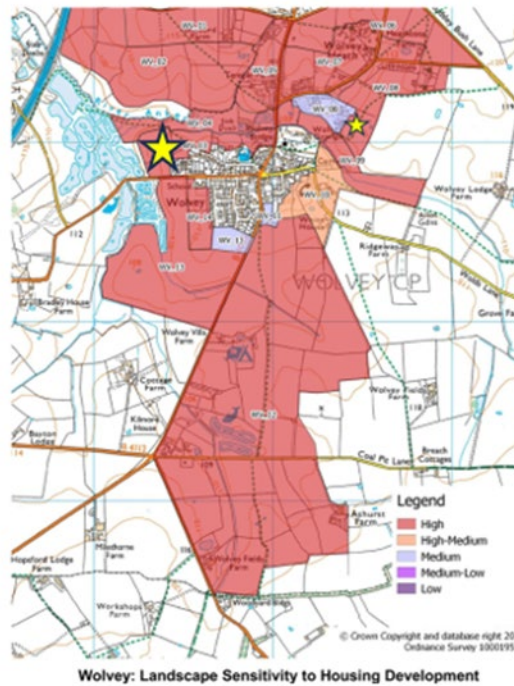
1) The proposed 150 new homes are of a disproportionate scale with the current village. The Council's evidence, contained within the 'Rural Sustainability Study,' identifies Wolvey as the smallest and 'lowest ranked' of the Main Rural Settlements – yet is proposing the third highest level of growth after Long Lawford and Brinklow. The study acknowledges that, as of 2024, there were only some 357 dwellings in Wolvey Village. 210 additional dwellings (in total) would increase the size of the village by some 60%. This is a totally disproportionate level of growth, particularly given the unsustainable location and substantial loss of Green Belt land required. Growth for the Borough of Rugby is expected to only be some 20% over the 15-year plan period. It is therefore illogical that such a disproportionate growth is planned for Wolvey (a small remote settlement with limited services, facilities, employment and transport choice located within the Green Belt). A proportionate level of growth would be c.70 units (c.20% expansion of Wolvey) which would largely be met by the remaining proposed allocation at 'Land at Coventry Road, Wolvey' and existing commitments.

2) The proposed allocation is within the Green Belt. Site 309 is a green field site that would, if developed, result in the loss of substantial areas of Green Belt (some 7 hectares). The NPPF is clear that LPAs should have exhausted all opportunities to develop land outside of the Green Belt and that:

*"Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified"* (NPPF para 145).

There appears little justification to remove proposed site 309 from the Green Belt when there are more sustainable alternatives available close to the Rugby Urban area.

3) Landscape impacts. The 'Landscape Sensitivity Study' report (2016) concluded that the majority of land proposed at site 309 was of 'High sensitivity to housing development'. The proposed allocation falls within parcel (part of WV-03) to the north of Bulkington Road. The map below shows the areas of 'High Sensitivity (in red) with the proposal site 309 shown by a yellow star.



Map 1. Wolvey Landscape sensitivity map 2016

The 2016 Landscape Sensitivity study noted:

***"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."***

The more recent 'Rugby Borough Council Landscape Sensitivity Assessment', concluded that the impact on site 309 would be mostly 'medium to low'. This is, at best, questionable. Whilst it is acknowledged that up to date evidence needs to be gathered to support a new local plan, there have been no material changes in the landscape since the previous study that would justify a change in sensitivity that would merit such a shift.

There is a strong concern that the 'sensitivity to new development' of site 309 has been inexplicably downgraded in the latest Landscape sensitivity study 2025 to seek to justify a disproportionate allocation. The photographs below show the sites potential prominence when viewed from the River Anker valley Looking south. There are substantial changes in topography across the site with the land falling north and west down to the River Anker Valley and adjacent fishing ponds. This would have a detrimental impact on the character of Wolvey village where the majority of development off Coventry Road sits atop the plateau above the river valley.

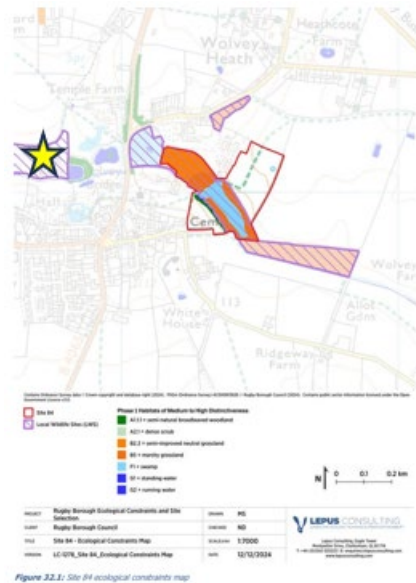


Photograph 1: views from the Anker Valley looking towards housing on the plateau above.

#### 4) Ecology

Part of the site abuts the Wolvey Trout Pits Potential Local Wildlife Site. The Council's evidence contained within the 'Ecological Constraints Assessment Rugby Borough Council October 2025' is unsound in that it does not assess the ecological impacts of development at proposed site 309. The assessment of the adjacent site 84 (which is subsequently dismissed as a suitable option) excludes site 309.

The map below from the 'Ecological Constraints Assessment Rugby Borough Council October 2025' shows the Potential Local Wildlife site (not shown in its entirety) abutting the proposed allocation at site 309. This is not shown as a potential Local Wildlife Site on the Council's Policies Map (inset for Wolvey). The area is shown as a 'Local Green Space' on the policies map (inset for Wolvey). This underplays the potential ecological importance of the land.



Map 1. Extract from the 'Ecological Constraints Assessment Rugby Borough Council (October 2025)' showing PLWS adjacent site 309.

The policy requirements for site 309 add very little specific detail in terms of expectations to mitigate the impacts of development on the adjacent Potential Local Wildlife Site and associated 'blue infrastructure'.

It is worthy of note that the Local Wildlife Trust submitted representations in relation to site 309 during the previous 'Regulation 18 'Preferred Options' consultation. Warwickshire Wildlife Trust's representations indicate that:

*"We are particularly concerned regarding a number of the housing/ employment allocations such as an allocation south of Leicester Road, directly next to Wolvey Wetlands Reserve and Local Wildlife Site near Wolvey right adjacent to the river Ankor habitat an important blue corridor for a number of protected and important species as well as Wolvey Rush Pasture PLWS and Wolvey Trout Pits PLWS.*

*....As well as an allocation for 150 homes at Wolvey near to Wolvey Trout Pits PLWS another key wildlife site in Warwickshire. Which should have considered alternatives sites in the Sustainability Appraisal."*

Given these specific concerns expressed by an independent and suitably qualified and experienced organisation, it would have been appropriate to dismiss site 309 as an option or fully assess the ecological impacts of development on the site in more detail. No convincing evidence has been provided that confirms whether the proposed allocations would result in harm to these sites or any justification for development outweighing this harm.

The Sustainability Appraisal (SA) accompanying the Draft Local Plan identifies ecological concerns raised by the Local Wildlife Trust. The SA states:

*"A further consideration is biodiversity constraint highlighted by the Wildlife Trust through consultation in 2025, but the Ecological Assessment flagged few concerns. It is noted that whilst the site is being promoted for 190 homes the proposed allocation is for 150 homes, which could suggest some additional opportunity for green and/or blue infrastructure. This is a*

*matter for further consideration, noting that the concept masterplan submitted by the site promoter shows very little land for green blue infrastructure along the boundary with the river corridor."*

The SA also states that:

*".....the Ecological Assessment flagged few concerns...."*

However, the Ecological Assessment does not specifically consider site 309.

No convincing evidence or justification has therefore been provided which demonstrates that development would outweigh any ecological harm that could potentially result from the site's allocation.

## 5) Infrastructure

The proposal for 150 new homes would place increased pressure on existing services and facilities.

### Education.

Based on the County Council's yield rates for primary education (34 pupils per 100 homes), there would be insufficient primary school places to accommodate the proposed levels of growth. The SA indicates that:

*".....the projected shortfall of places (years R-6) remains marginal, peaking at 22 pupils at The Revel and 38 at Wolvey....." (SA para 5.2.50).*

An existing shortfall of spaces would clearly be exacerbated by further housing growth of 150 homes (c.51 new primary age pupils). Recent development of some 90 homes at Wolvey Heath further adds to capacity constraints. Any surplus capacity would require transportation to the nearest alternative school. Given the remote nature of Wolvey and the fact that the nearest primary school is nearly three miles away in Bulkington, there would be additional costs to the public purse and substantial implications for both sustainability and community cohesion.

Any school extension, if required, would need to be funded by the developer which would have implications for viability which (along with other financial contributions). It is not clear whether this has been fully assessed to ensure this is deliverable.

There is no secondary school in Wolvey. 150 new homes would result in some 24 new secondary pupils (using Warwickshire Council yield rates of 0.16 for secondary schools) that would require a journey of some 4.5 miles to the nearest senior school (in Bedworth). This is not a sustainable travel pattern and has cost implications for the public purse. Warwickshire County Council have a duty to transport secondary school students who live more than three miles away from the nearest school. Warwickshire County Council (like many Local Education Authorities) already have substantial financial constraints, which would be further stretched if Secondary School transportation were to be required. Alternatively, school transportation would result in increased car use. This is contrary to the NPPF which encourages access to services and facilities (including education) by sustainable modes.

### Public transport

There are very limited public transport services that connect Wolvey to higher order centres. The '74 bus service' runs six journeys per day to Nuneaton and Coventry. It is a lengthy circuitous journey, infrequent, and does not operate on Sundays and evenings. This frequency of service and journey time does not encourage modal shift to bus use. There are no firm commitments from the bus operator to enhance the service, and financial contributions from developers would not necessarily result in a long-term improvement to the frequency and number of services (given that it serves several settlements). Any public transport financial contributions would also add to viability challenges.

The policy seeks 'Contributions to improved public transport provision'. However, public transport contributions are only meaningful if there is a firm commitment from the existing bus operator to increase frequency and extend the service timing – no such evidence has been provided.

#### Sustainable transport routes

Wolvey is a remote rural settlement. Evidence from Sustrans and the Chartered Institution of Highways and Transportation (CIHT) suggest that walking distances of 800 metres and cycling distances of 3 kilometres are generally considered the acceptable standard to access services. There is no substantial employment, major retailing (convenience or comparison), hospitals, secondary schools, or commercial leisure opportunities in Wolvey or within distances which could be accessed sustainably (walking and cycling).

The NPPF is clear that development should be located where 'sustainable' modes of travel (walking and cycling) can be accessed. It is unrealistic to suggest that a significant proportion of any new residents would walk or cycle to the nearest well-served towns (Nuneaton 5.8 miles away) and Hinckley (4.7 miles away). There are no direct public footpaths or cycle routes and access by cycle would be along busy, fast, and dangerous classified roads. Access to the nearest main town centre at Hinckley would involve crossing the A5 / M69 junction. The nearest major employment sites are at Sketchley Industrial Estate (Hinckley) which is four miles by road, and North Coventry (M6 junction 2) which is five miles by road. It is unrealistic to assume substantial sustainable travel from the proposed development at site 309.

In summary, the proposed allocation of site 309 (Land north of B4109, Wolvey) is unsound because it is not 'justified' by the evidence. There is limited specific evidence on the impacts of the development on infrastructure, viability and ecology.

Where evidence is provided, it does not support the proposed allocation, particularly in terms of:

- Landscape – where the evidence has previously suggested that the site is of 'high sensitivity'.
- Transport infrastructure – where evidence suggests that transport choice is weak with poor public transport and few options to access services, facilities and employment by sustainable modes.

- Social infrastructure – there is recognition of the very limited capacity at the Local Primary School and a requirement for lengthy journeys to secondary school, and
- The Sustainability Appraisal which indicates that “*Wolvey is a notably small main rural settlement with a low settlement score*”.

In addition, the allocation is contrary to the NPPF in that it seeks to remove land from the Green Belt (when there are sequentially superior alternatives available) and encourages growth in a less sustainable location with poor access to transport choice.

Site 358 - Land at Coventry Road, Wolvey

In summary, Wolvey Parish Council recognise that the proposed allocation for 60 homes at ‘Land at Coventry Road, Wolvey’ (site 358) is justified and an appropriate scale of development. Sixty new homes (alongside the 11 permitted at Coventry Road, Wolvey LPA ref: R22/0670) would deliver some 70 new homes during the plan period. This is a c.20% increase in housing in Wolvey village. This is considered a proportionate quantum of development in a village with modest services and facilities.

The allocation of site 358 is consistent with evidence contained within the Landscape Character Impact assessments. These indicate that a modest impact would be felt on the character of the village. This scale of development is also likely to be assimilated within the available social infrastructure capacity, in particular Primary School places

(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.

Policy S6 should be amended with the deletion of the proposed allocation of site 309 for 150 homes at ‘land north of B4109, Wolvey’.

Alternative sites should be considered to deliver the Council’s housing requirements in strategically preferable locations (such as adjacent to the urban areas of Rugby and Coventry) and sites that are outside of the Green Belt. There are multiple options (such as Cosford) that appear to have been lightly dismissed, and which offer far more sustainable solutions.

(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:

Policy S6, as drafted, would result in the delivery of substantial growth to Wolvey village. If 210 homes were allocated (coupled with existing commitments), Wolvey village would grow by some 60%. It is important for the Local Community to be able to express their concerns on the impacts of proposed growth on the character of the village and its infrastructure.

**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.

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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<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>

## 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 13<sup>th</sup> March 2026**  
**By email to:** [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) with **Proposed Submission Consultation in the subject line, OR by post to:** Development Strategy, Town Hall, Evreux Way, Rugby, CV21 2RR.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

#### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*

#### 2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Wolvey Parish Council"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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

Name or Organisation:

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

Paragraph	Annex: (pp138)	Policy	Annex: Allocation site 309	Policies Map	Inset map (Wolvey)
Site ID	309				

4. Do you consider the Local Plan:

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

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.

Wolvey Parish Council object to the proposed allocation of 150 homes at 'land north of B4109, Wolvey' (site ID 309). The specific reasons include:

- The proposed 150 new homes are of a disproportionate scale with the current village. The Council's evidence, contained within the 'Rural Sustainability Study,' identifies Wolvey as the smallest and 'lowest ranked' of the Main Rural Settlements – yet is proposing the third highest level of growth after Long Lawford and Brinklow. The study acknowledges that, as of 2024, there were only some 357 dwellings in Wolvey Village. 210 additional dwellings (in total) would increase the size of the village by some 60%. This is a totally disproportionate level of growth, particularly given the remote, unsustainable location and substantial loss of Green Belt land required. The Policies inset map for Wolvey demonstrates that the scale of growth proposed (particularly to the west of the village) would substantially skew the village form.

Growth for the Borough of Rugby is expected to be some 20% over the 15-year plan period. It is therefore illogical that disproportionate growth of some 60% is planned for Wolvey (a small remote settlement with limited services, facilities, employment and transport choice located within the Green Belt) and other rural settlements. A proportionate level of growth for Wolvey would be c.70 units (c.20% growth in the village) which would largely be met by the remaining proposed allocation at 'Land at Coventry Road, Wolvey' (site 358).

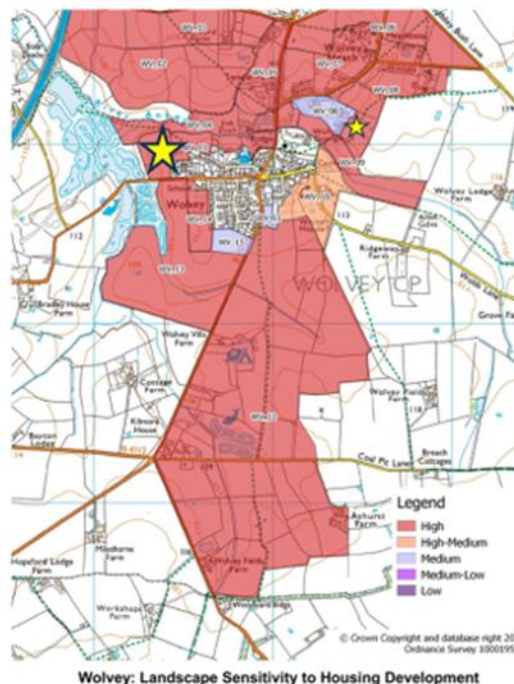
- The proposed allocation is within the Green Belt. Site 309 is a green field site that would result in the loss of a substantial area of Green Belt (some 7 hectares). The NPPF is clear that LPAs should have exhausted all opportunities

to develop land outside of the Green Belt before releasing Green Belt land and that:

*"Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified" (NPPF para 145).*

There appears little justification to remove proposed site 309 from the Green Belt when there are more sustainable alternatives available close to the Rugby Urban area.

- 3) Landscape impacts. The 'Landscape Sensitivity Study' report (2016) concluded that the majority of land proposed at site 309 (part of parcel WV-03) was of 'High sensitivity to housing development'. The proposed allocation is entirely within a previously defined area of 'High Sensitivity' (see map below where site 309 is shown as a yellow star).



Map 1. Wolvey Landscape sensitivity map 2016

The 2016 Landscape Sensitivity study noted:

***"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."***

The more recent 'Rugby Borough Council Landscape Sensitivity Assessment', concluded that the landscape impact on site 309 is mostly 'medium to low'. This is, at best, questionable. Whilst it is acknowledged that 'up to date' evidence needs to be gathered to support a new local plan, there have been no material changes in the landscape since the previous study that would justify a change in sensitivity that would merit such a shift.

There is a strong concern that the 'sensitivity to new development' of site 309 has been inexplicably downgraded in the latest Landscape sensitivity study 2025 to seek to justify a disproportionate allocation. The photographs below show the sites potential prominence when viewed from the River Anker valley Looking south and west.



Photograph 1: views from the Anker Valley looking towards housing on the plateau above.

There are substantial changes in topography across the site with the land falling north and west down to the River Anker Valley and adjacent fishing ponds. This would have a detrimental impact on the character of Wolvey village where the majority of development off Coventry Road sits atop the plateau above the river valley.

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Part of the site abuts the 'Wolvey Trout Pits Potential Local Wildlife Site'. The Council's evidence contained within the 'Ecological Constraints Assessment Rugby Borough Council October 2025' is unsound, in that it does not assess the ecological impacts of development at proposed site 309. The assessment of the adjacent site 84 at 'Preferred Options' stage (which was subsequently dismissed as a suitable option) excludes site 309.

The map below from the 'Ecological Constraints Assessment Rugby Borough Council (October 2025)' shows the Potential Local Wildlife site, albeit not in its entirety, (see yellow star) abutting the proposed allocation at site 309. Despite this, the Ecological Constraints assessment does not include site 309.

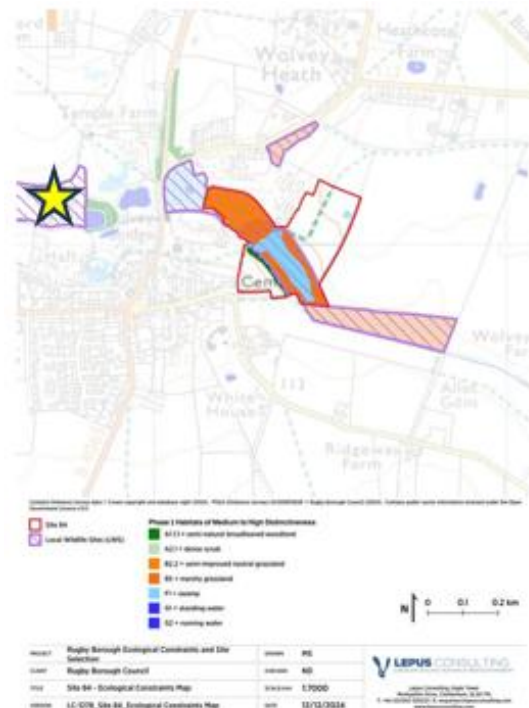


Figure 2.2.1: Site 309 ecological constraints map

Map 2. Extract from the 'Ecological Constraints Assessment Rugby Borough Council (October 2025)' showing PLWS adjacent site 309.

The 'Wolvey Trout Pits Potential Local Wildlife Site' is not shown on the Council's Policies Map (inset for Wolvey). The area is shown as a 'Local Green Space' on the policies map. This underplays the potential ecological importance of the land.

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The SA also states that:

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However, the Ecological Assessment does not specifically consider site 309.

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## 5) Infrastructure

The proposal for 150 new homes would place increased pressure on existing services and facilities in Wolvey.

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In summary, the proposed allocation of site 309 (Land north of B4109, Wolvey) is unsound because it is not 'justified' by the evidence. There is limited specific evidence concerning the impacts of the proposed development on infrastructure, viability and ecology.

Where evidence is provided, it does not support the proposed allocation, particularly in terms of:

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

Wolvey Parish Council do not consider that site allocation 309 is a suitable or sound option for delivering growth. It would result in the delivery of substantial disproportionate growth in Wolvey village. If all of the 210 homes proposed for Wolvey were allocated (coupled with existing commitments), the village would grow by some 60%. It is important for the Local Community to be able to express their concerns on the impacts of proposed growth on the character of the village and its infrastructure.

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