

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*

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

2. Agent's Details (if applicable)

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

Local Plan Paragraph		Local Plan Policy	S1 settlement hierarchy	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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

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

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

I consider policy S1 to be unsound in that it does not appear justified by the supporting evidence. I feel that the Rugby urban area should actually accommodate the majority of new growth and not the remote and less well-served rural areas.
The definition of the 'Main Rural Settlements' is actually not sound – Wolvey has been given the third highest allocation for housing but is actually the smallest and least well-served of all the Rural Villages

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 is a small remote village unable to accommodate the level of growth proposed. It should be in a lower category in the hierarchy because it has very limited services, facilities, employment and public transport, and cannot support this level of growth.

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:

N/A

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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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		Local Plan Policy	S2 Strategy for homes	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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

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

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

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The modification should be for more growth to be allocated to the Urban Areas around Rugby and Coventry. There should be a reduction in Wolvey and other remote rural areas. There are also potential alternative sites that are superior in terms of strategic location and sustainability

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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?

Local Plan Paragraph		Local Plan Policy	S5 Countryside protection	Policies Map	
Site ID	309 & 358				

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"/>

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This 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 seeks to identify large areas of Green Belt as 'Grey belt'. These areas are needed to safeguard the countryside from encroachment, preventing urban sprawl and maintaining openness. The plan does not follow the National Planning Policy Framework to only allow changes to Green Belt in exceptional circumstances

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The allocations and designations should follow the National Planning Policy Framework and only allow changes to the Green Belt in exceptional circumstances.

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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?

Local Plan Paragraph		Local Plan Policy	S6 residential allocations	Policies Map	
Site ID	309 & 358				

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"/>
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The land north of B4109, Wolvey should not be allocated for housing for the reasons set out below:

- 150 new homes are of a disproportionate scale to the size of the current village
- The proposed allocation is within Green Belt, this is contrary to Government Policy
- Previous landscape studies that have been conducted indicated that the land has 'High sensitivity to housing development'. This cannot therefore be a suitable proposal
- Part of the site (309) is next to a Local Wildlife Site. There has not been a sufficient assessment of the ecological impact of any development in this area
- 150 homes (and up to 210 homes with the 2nd site) is too much for Wolvey's infrastructure in terms of pressure on the primary school, travel to secondary schools, its GP practice, and also its very limited public transport provision
- The Council's own Sustainability Appraisal indicates that Wolvey is a small rural settlement with a low settlement score

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

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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?

Local Plan Paragraph		Local Plan Policy	CL1 Net zero buildings	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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

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The Climate change section of the emerging Local Plan is not sound because it is not consistent with the National Planning Policy Framework. It fails to address the 'location' of development to ensure that new housing seeks to maximise walking and cycling (the most sustainable modes of travel) alongside good access to public transport, in accordance with the National Planning Policy Framework.

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

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

Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	CL2 Renewable energy	Policies Map	
Site ID	309 & 358				

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"/>

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Renewable energy and low carbon energy development are inappropriate development in the Green Belt

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

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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?

Local Plan Paragraph		Local Plan Policy	EN1 Biodiversity	Policies Map	
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"/>

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The proposed allocation (Land north of 84109.Wolvey) is adjacent to an existing Local Wildlife site. A proportionate ecological assessment should have been undertaken.

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

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

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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?

Local Plan Paragraph		Local Plan Policy	EN2 Landscape protection	Policies Map	
Site ID	309				

4. Do you consider the Local Plan:

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

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The allocations proposed in the Local Plan do not reflect the available evidence in terms of impacts on the landscape. In particular for the site at Land north of B4109, previous evidence has indicated that the site has 'High sensitivity to housing development' in landscape terms. The allocation of Land north of B4109 would also extend the village substantially towards the River Anker along the valley slopes and this would have a large impact on the character of the village

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

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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?

Local Plan Paragraph		Local Plan Policy	D5 Drainage	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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

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Design policies D1 to D5 that seek to improve design quality are welcome. However the scale of development proposed for Wolvey (a 60% increase in village size) would harm local character and its rural setting

Policy D5 does not appear to address the current flood areas within villages and how water drainage in an existing flood area could be effectively managed without polluting existing waterways and worsening any flood risk. Wolvey already has experience that SuDs are not sufficient and flooding has dramatically increased with recent housing development on areas close to the River Anker.

Additionally, the policy does not take into account the pressure that would be placed on an already struggling wastewater system

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

The potential impact of large-scale growth on the character of Wolvey needed to have been fully considered before sites were proposed as allocations. Additionally sites need to have taken into account existing flood issues experienced in the village already and existing wastewater issues

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:

N/A

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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?

Local Plan Paragraph		Local Plan Policy	I1 transport	Policies Map	
Site ID	309 & 358				

4. Do you consider the Local Plan:

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

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

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Wolvey is a small remote Village with modest accessibility and is poorly served by public transport. The proposed new homes are remote from urban areas that would offer shops, jobs, leisure and medical facilities. Wolvey has very limited services and facilities meaning that car travel is essential. There is a very limited bus service that connect Wolvey to Nuneaton and Coventry but none to the nearest town of Hinckley

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

The proposal for large housing sites in Wolvey should be removed from the Local Plan. Wolvey does not have good access to services or facilities and has 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, 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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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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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		Local Plan Policy	I4 Infrastructure & planning	Policies Map	
Site ID	309 & 358				

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.

The scale of development proposed for the village of Wolvey is not capable of being supported by the available infrastructure. Important areas of infrastructure that are lacking Include:

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

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

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

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)

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

N/A

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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?

Local Plan Paragraph	PP138	Local Plan Policy		Policies Map	
Site ID	309 Pg 138				

4. Do you consider the Local Plan:

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

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

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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

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

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

Site 309 should be deleted as a proposed allocation of 150 homes at 'land north of B4109, Wolvey'.
Alternative sites should be considered in strategically preferable locations (such as adjacent to the urban areas of Rugby and/ or Coventry)

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)

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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?

Local Plan Paragraph	PP137	Local Plan Policy		Policies Map	
Site ID	358 Pg 137				

4. Do you consider the Local Plan:

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

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

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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

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

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

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

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

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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