

BARBY & ONLEY PARISH COUNCIL NORTHAMPTONSHIRE

Clerk's Address: 77 HIGH STREET, NASEBY NORTHANTS NN66DD

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Preferred Option Consultation, Development Strategy Team, Town Hall, Evreux Way Rugby CV21 2RR

By email: localplan@rugby.gov.uk

15th May 2025

Dear Sirs,

Re: OBJECTION TO SITE 73, LODGE FARM – LOCAL PLAN CONSULTATION

As a neighbouring Parish, Barby & Onley Parish Council (BOPC) object to the inclusion of Site 73 (Lodge Farm) in the Preferred Option Local Plan Sustainability Appraisal of Rugby Borough Council's Local Plan. It is the view of BOPC, that Lodge Farm is not a 'reasonable alternative scenario' and consequently should not be included in RBC's Regulation 19 submission Plan.

NO CIRCUMSTANTIAL CHANGE SINCE 2019

As there has been no substantial material change in circumstances since Lodge Farm was found unsound by the Planning Inspector in 2019, (indeed, the 2025 development is proposed to be significantly larger and cover a much greater area than the 2019 Lodge Farm proposal), BOPC can see no justification as to why Lodge Farm is even being considered as a potential option. The recent AECOM Sustainability Report states that 'the great majority of the concerns raised (..in the 2019 Inspector's report) remain entirely applicable at this current time'

The three key reasons that the 2019 Inspectors report rejected a development at Lodge Farm are stated below. In their 2025 submission the Developers still do not provide adequate mitigation regarding these points and hence the reasons from 2019 to reject this development still remain relevant.

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• <u>1 Transport</u> – the remote location of the development would mean Lodge Farm would be a high car dependency site. Within their current proposal the Developer commissioned a report by City Science. This report only outlines tentative & speculative 'visions' for possible sustainable transport options. However no firm and deliverable options are proposed by the Developer in 2025 to address the transport problems highlighted in the Inspector's 2019 report. There continues to be no proposal for a solution to the already congested traffic flow issues through Dunchurch

- <u>2 Landscape</u> the 2025 Lepus Landscape Sensitivity Assessment identifies Lodge Farm as having significant sensitivity to development which is not addressed in the current Developer's proposal
- 3 Infrastructure In 2019 the Developers gave no firm proposal nor financial commitment to the inclusion of any further infrastructure needed to support the development eg highway capacity, Doctor's surgeries or secondary schools. Nor does the Developer's 2025 proposal include any financial commitment or firm plan to provide the necessary infrastructure

HIGHWAYS

BOPC consider that the projected 16,000–25,000 new vehicle movements/day that would be created by the Lodge Farm development will cause significant delays & congestion on the road network in the surrounding area and through our Parish. This will have a direct negative impact upon our Parishioners and Parish businesses. The junction of Longdown Lane onto the A45, one of the major routes into & out of Barby village, is already an accident 'black spot' with the current amount of traffic utilizing the road network. There is only one road in and out of Onley village that serves our Parishioners and all the traffic to and from the Prisons. Again, the junction of this road onto the A45 is extremely hazardous and has a high accident incident rate with the current amount of traffic usage. The increased traffic movements created by the Lodge Farm development will be unsustainable and will unacceptably increase the risk of road traffic accidents for our Parishioners traveling to and from their homes.

Dunchurch being a conservation area is an important area asset and helps promote and support many of the businesses in our Parish that are involved in tourism. Currently the crossroads of the A426 and A4429 in the center of Dunchurch is an area of constraint and is already congested which causes our Parishioners delays and inconvenience. BOPC are concerned that the considerable traffic created by the Lodge Farm development will create additional congestion through this conservation area which will impact upon tourism in our Parish and upon the lives of our Parishioners. An eastern bypass could not be built around Dunchurch to help alleviate traffic flow due to a historic environment constraint. In their proposal, the Developers of Lodge Farm seem to assume that the additional traffic through

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Dunchurch created by the development will be reduced by the South West Link, however, this is not a feasible option.

The A45/M45 junction is the closest motorway junction to our Parish and is utilised by our Parishioners. This junction, without any increase in vehicle movements, has already been flagged as "High Concern" by National Highways.

There is considerable concern within BOPC that the additional traffic generated by Lodge Farm has the potential to overwhelm the strategic road network (SRN) within our Parish area; National Highways have also expressed similar concerns.

BOPC is also concerned about the effect of the additional air pollution in the local area that would be caused by the traffic generated by the thousands of extra vehicles each day going to and from the Lodge Farm site.

ENVIRONMENTAL

The Planning Inspectorates' 2019 report on the then Lodge Farm development (which at the time was for far fewer houses than proposed in 2025) stated that the development would cause a "major adverse" visual impact.

It is the view of BOPC that the visual impact of the Lodge Farm development is unacceptable to our Parish; it would 'engulf' the hamlet of Onley which is categorised as a territory village. The visual impact of the development would also be particularly apparent from other parts of our Parish including Barby Hill and the Rainsbrook Escarpment and would be contrary to our Parish neighbourhood development plan and impact upon our Parish's protected, important views.

The development would create a devastating environmental impact on the landscape of the Leam & Rainsbrook Valleys which would be irreversible. This would detrimentally alter the setting and would destroy the character of our Parish.

The development will cut through the Leam Valley ecological corridor and threaten wildlife including farmland bird species, bats, hares & barn owls. Wildlife corridors that go through our Parish and into the Leam Valley will be potentially destroyed.

Draycote Meadows SSSI, which is viewable from our Parish, will be at risk from light, noise and runoff.

The risk of flooding to Onley which is low lying and has heavy clay soil will be significantly increased if the Lodge Farm development was permitted to go ahead.

The Oxford Canal Conservation area, that runs through our Parish, is characterised by its tranquil rural setting & open countryside views. The Canal Conservation Area Assessment explicitly identifies this part of the canal corridor that is within our Parish as "open countryside with few other intrusions," highlighting the importance of preserving its undeveloped character. The proposed development would introduce a large-scale urban form into this sensitive landscape which would alter its setting and breach the visual and experiential continuity of the canal through our Parish.

ECONOMIC

BOPC can see no justification as to why Lodge Farm should be seen as a potential site as it does not meet Rugby Borough Council's stated requirement that sites need

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to be deliverable in the short term nor can the development feasibly deliver the requirement for 30% affordable Housing.

One of our Parish businesses, in the tourism industry, Dunchurch Pools Marina in Onley, will be at significant risk if the Lodge Farm development went ahead. The business employs 20+ local people and their customers input into the local economy by the utilisation of local shops, restaurants etc

CONCLUSION

BOPC confirm their objection to the Lodge Farm development being included as an allocation in the regulation 19 Submission plan due to the impact that this development would have upon our Parish.

Yours faithfully

Barby and Onley Parish Council



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15th May 2025

Dear Sirs,

Re: OBJECTION TO THE FOLLOWING PREFERRED SITES - LOCAL PLAN CONSULTATION

Site 40 Land east of Kilsby Road Site 334 Land off Barby Lane

As a bordering Parish, Barby & Onley Parish Council (BOPC), object to the inclusion of the above two sites (in Hillmorton) in Rugby Borough Council's Local Plan due to the impact that these developments would have upon our Parish and our Parishioners.

ENVIRONMENT

The Rainsbrook Valley, that separates our Parish from Hillmorton, is a sensitive landscape area which is recognized by the 2016 Landscape sensitivity study. The Rainsbrook Valley provides a vital ecological and visual buffer between the urban edge of Rugby and the village of Barby. The Rainsbrook Valley provides the unique landscape character setting and rural identity of our Parish and any developments within it will detrimentally change the setting of our Parish. Development in the Rainsbrook Valley would be irreversible and the landscape would be lost for future generations. The developments would go against national and local planning policies that seek to protect the Countryside surrounding urban areas that are scattered with villages like Barby ie maintaining their rural settings. Wildlife corridors from the proposed areas that link with our Parish will be destroyed.

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The Developments will impact upon policies ENV 3 (sites & features of natural environment significance) & ENV 4 (Biodiversity across the neighborhood area) within our March 2025 Neighborhood Development Plan (NDP).

The visual impact of the developments will also be contrary to our NDP POLICY ENV 8: LANDSCAPE CHARACTER – as the Developments do not respect the distinctive landscape character of the Neighbourhood Area as detailed in the documentation for Northamptonshire Landscape Character Areas 13 (Undulating Hills) and Valleys and 19 (Broad Unwooded Vale).

The Proposed developments will also impact upon many of the important protected views within our Parish in particular site 334 which would be detrimental to BOPC's protected view running the length of Barby Lane to Barby village (view 9 in our NDP).

PRESSURE ON LOCAL AMENITIES

Due to proximity, many of our Parishioners have to utilise the local shops, medical and community facilities in the Hillmorton area which are, currently, already overstretched. If an additional several thousand new Hillmorton residents were also to use these same amenities this would put too high a burden on the local infrastructure to the detriment of our Parishioners and the existing residents of Hillmorton. No new infrastructure is proposed along with these developments.

HIGHWAYS & THE EXISTING ROAD NETWORK

Our Parishioners need to use the Ashlawn Road/ High Street/Hillmorton Rd/Crick Rd and the junctions with Barby Lane & Onley Lane to reach and leave their homes to the north of our Parish. These Hillmorton roads are already overwhelmed with traffic and are grid locked daily making travel in and out of Barby village extremely difficult. At school opening/closing times the top of Barby Road onto the A428 is already extremely hazardous due to car parking. The everyday lives of our Parishioners (just going to work, medical appointments, taking children to school, going shopping etc) will be detrimentally impacted by the addition of even more cars on the road infrastructure as a result of these developments.

West Northants local highways authourity (LHA) in their response (dated 1/4/25) to WNC's planning application 2023/5783/MAF state that the current state of Barby Lane is already 'suboptimal'. The LHA confirm that ' these roads were originally designed to handle only light residential traffic' i.e. the current residential traffic generated by & to/from our Parish and not by any additional traffic generated by site 334. Barby Lane has no footpaths, it is too narrow and in too dangerous a state to accommodate any further developments

CONCLUSION

It is the view of BOPC that for the reasons stated above the Hillmorton developments would have too great an impact upon our Parishioners hence we wish our objection to them to be noted.

Yours faithfully

Barby and Onley Parish Council