



Rugby Preferred Options Consultation

May 2025

Consultation Response

On behalf of my clients The Crick Road Residents I write to express strong objections to Preferred Allocation Ref: 40 'East of Kilsby Lane, Hillmorton, Rugby'.

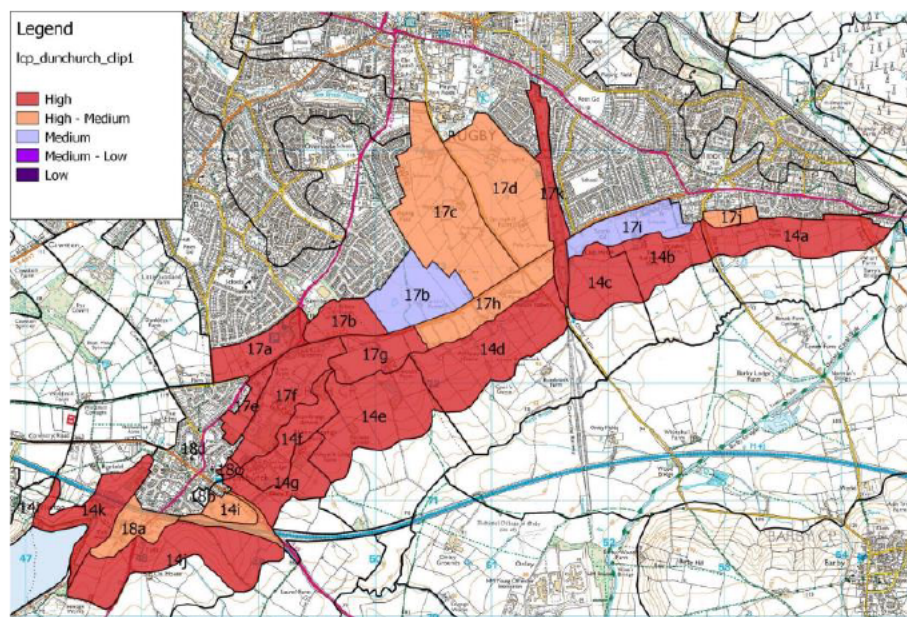
The Preferred Allocation at Kilsby Lane is proposed to provide circa 125 dwellings which would be required to provide a pedestrian access to the canal towpath, footway creation along Kilsby Lane as well as a footway onto Crick Road. This consultation response sets out the reasons that the Council should not proceed with allocating the site for residential development as part of future consultation drafts of The Rugby Local Plan.

Our objections primarily focus on the following points:

- Impact on Landscape Character
- Impact on Traffic and Wider Highway Network
- Surface Water Flooding
- Availability of Land

Impact on Landscape Character

The land proposed to be developed as part of Preferred site ref: 40 is located within the Rainsbrook Valley which was subject to a 2017 landscape study 'Rainsbrook Valley Landscape Sensitivity Study'. Within this report land east of Kilsby Lane and surrounding land was considered to be highly sensitive which was defined as *'landscape and or visual characteristics of the zone are very vulnerable to change and/or its intrinsic values are high and the zone is unable to accommodate the relevant type of development without significant character change or adverse effects. Thresholds for significant change are very low'*



It was considered in 2017 that zone 14a, which includes land east of Kilsby Lane, would be highly sensitive to housing development which was originally set out within a 2006 Landscape Assessment for the Borough. The report stated that the sensitivity of this land remains unchanged because of the openness of the eastern part, the rural qualities of the western part and the topography.

The site at East of Kilsby Lane was subject to a planning application for up to 130 dwellings (ref: R15/1366) which was refused by Rugby Borough Council 9th November 2022. The reason the application was refused related to the significant impact the development would have on the character and appearance of the landscape in this location. It was considered that the development would appear as an intrusive extension of the urban area into the surrounding countryside and would diminish the landscape character of this area. It was considered in 2022 when the application was refused that the development would also appear visually intrusive and prominent within the landscape to the point of being harmful to the qualities, character and amenity of both the countryside and the setting of Hillmorton. It was concluded that the adverse impacts of the scheme would be significant and demonstrably outweigh the benefits of the proposed development.

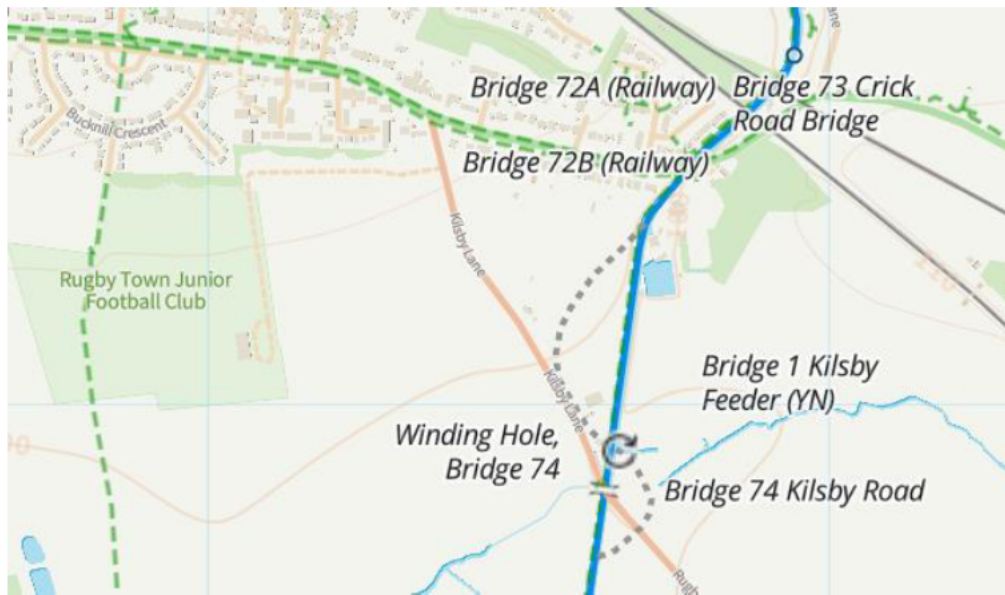
As part of the consultation for the application it is understood that the Council commissioned a Landscape Consultant to review the applicant's LVIA and it was considered that the proposed scheme would have a significant impact on the landscape setting and its character which resulted in the refusal of the planning application.

This application was refused in late 2022 and therefore it is unclear how within three years that the Council now consider the site to be suitable for development given the strong landscape objection raised during the refused planning application. The character of the site nor the wider setting has altered since the application was refused in 2022 and therefore it is considered that the landscape at land east of Kilsby Lane should be protected as was originally stated within the 2006 landscape study and proceeding 2017 Rainsbrook Valley Sensitivity Study.

Given the long standing designation as land which should be protected due to its high level of sensitivity it is therefore unclear how the Landscape Sensitivity Assessment published March 2025 has categorised the site as low to medium landscape sensitivity.

As can be observed within the birdseye images overleaf the site comprises a number of fields with a strong band of mature trees which runs from Kilsby Lane north eastward towards Crick Road and the Canal. This band of trees also provides a the only remaining physical landscaping feature which follows the original canal route prior to it being straightened between 1831 and 1834 and therefore it is our view that the retention of the site in its current form is of significance from a cultural

history point of view. The original Oxford Canal route is denoted on the map by a grey dotted line below.



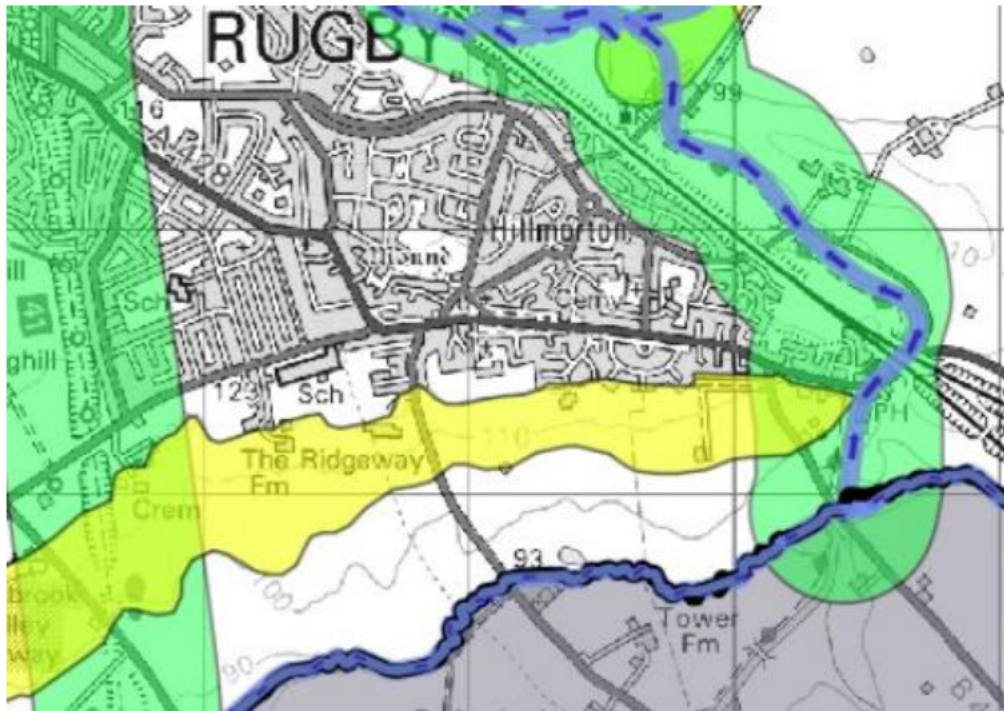
From a landscape sensitivity point of view the site forms the eastern extent of 14a within the Rainsbrook Valley Sensitivity Study which is characterised by its pastoral grazing fields and open views towards the wider Rainsbrook Valley area. The site forms a key part of the sensitivity area providing the firm line between the urban settlement along Crick Road to the north and the vast rolling countryside to the south.

It is our view that if developed not only will the development result in the loss of this important area of landscape but would cause significant detrimental harm to the remaining 14a area of the Rainsbrook Valley.





The entirety of the preferred allocation at Kilsby Lane is located within a Strategic Green Infrastructure Network (shaded green) and Potential Green Infrastructure Corridor (shaded yellow) which was identified within the currently adopted plan. It does not appear that the landscape sensitivity assessment took into consideration these green infrastructure corridors as part of their assessment. Any development within the Kilsby Lane site would need to maintain and enhance existing green infrastructure such as the established mature tree belt and boundary hedgerow which in our opinion would be difficult to achieve within the site and provide the number of dwellings proposed (125).



Impact on Traffic and Wider Highway Network

It is considered that if the site is allocated for development that it will have a significant impact on the highway network around Kilsby Lane and Crick Road which would cause a significant highway safety concern.

Kilsby Lane (B4038) itself is a narrow country road which in our opinion would not be suitable for the scale of development proposed (125 dwellings) at Land East of Kilsby Lane. This is due to there being limited scope due to the width of the highway to provide a right hand turn lane to enter the development increasing the risk of collisions as cars wait to enter/leave the site.

Land east of Kilsby Lane scored extremely poorly within the Council's Public Transport Accessibility Assessment due to its limited access to public transport. Kilsby Lane is not an existing bus route and therefore future residents would be required to walk towards more central areas of Rugby to access public transport which for residents with mobility issues living at the southern end of the site would be extremely difficult. This would increase reliance on private vehicles which should not be encouraged.

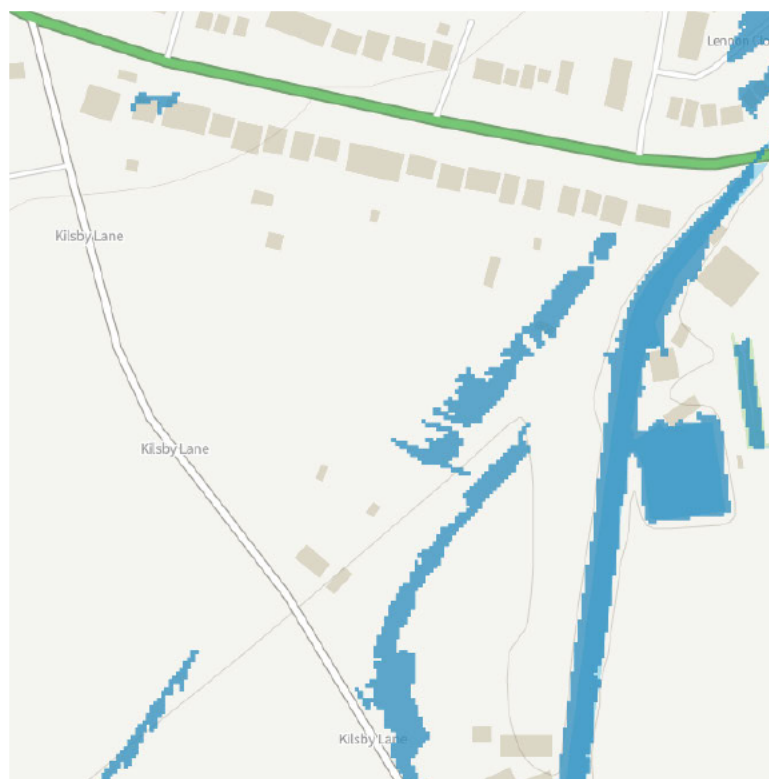
There are significant concerns regarding the cumulative impact on the wider highway network specifically in regards to users of the A428 Crick Road. When considering the other preferred allocations within close proximity to site ref: 40 specifically site ref: 334 'land at Barby Lane' (380 dwellings) and site ref: 338 'land south of Crick Road, Houlton' (250 dwellings). Cumulatively the three sites would increase housing numbers within the area by 755 dwellings, which based on each household owning two vehicles would increase the number of daily users of Crick

Road and the wider local road network by 1,510. This concentrated increase in new road users would exacerbate existing congestion issues along Crick Road and make junctions onto Crick Road such as the Kilsby Lane junction extremely dangerous.

As part of the evidence base for the Preferred Options Consultation each preferred allocation was assessed in terms of its impact on existing congestion, however it is our opinion that for the three sites within close proximity to Crick Road (ref: 40, 334 and 338) that the cumulative impact of these developments should be assessed rather than assessing the three sites in isolation. Traffic modelling should also take into account Rugby Parkway Station which would be directly accessed from Crick Road which once opened in 2026 will further increase traffic and congestion along Crick Road.

Surface Water Flooding

Within the latest update to the Environment Agency's Flood Maps the site is considered to be at a heightened risk of surface water flooding within the western area of the preferred allocation as shown within the below map (1 in 30, 1 in 100 and 1 in 1000). The addition of a significant amount of additional hardstanding which would be required as part of the development of the site to provide dwellings, access roads and walkways would raise the risk of surface water flooding due to the significant increase in impermeable surfaces within the site further raising flood risk within the site.



In light of the changes to the EA flood maps it is our view that all preferred sites should be reassessed in terms of existing and modelled future flood risk with sites at a heightened risk be discounted as potential development sites.

Availability of Land

We consider that it is appropriate to highlight to the Council that approximately 32% of the preferred allocation (1.56 ha) is currently on the market for sale which raises concerns whether the entire site could be developed. The site is marketed as a large open storage space with B1/B2 use. The site would therefore be likely to be purchased by a commercial enterprise which would not want to develop the site as a residential development or cooperate with the other landowners with land within the preferred allocation. This would reduce the amount of dwellinghouses which could be provided within the site impacting the Council's five year land supply figures. It is our view therefore that the site is no longer available and therefore should be removed as a preferred allocation.

Property listing: [Kilsby Ln, Rugby, CV21 4PN - Land for Sale | LoopNet](#)

Summary

In summary it is our view that land east of Kilsby Lane (ref: 40) should be removed from any future Local Plan drafts as a preferred allocation. This is primarily due to the site being of high landscape value (as started within previous landscape sensitivity assessments and previous planning refusal). Additionally we have concerns regarding the allocation's impact on the safety of the local highway network, especially when taking into consideration the cumulative impact of the other preferred allocations.

As well as this, since the Preferred Options Draft was published the Environment Agency updated their flood maps meaning that the site is now at a higher risk of surface water flooding. It is considered that the significant amount of additional impermeable surfacing required to develop the site (roads and buildings) that this will further raise surface water flooding concerns. A flood modelling exercise should therefore be carried out ahead of any further consultations taking place. Finally concerns are raised regarding whether the land is available for development given 32% of the preferred allocation is currently on the market for sale. It is therefore our view that Land Kilsby Lane should be removed from future consultations as a potential allocation.