

Comprehensive Objection
to the Proposed Lodge Farm Development (Site 73)
Stand Against Lodge Farm Village (SALFV)

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The SALFV Committee

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Preface: Procedural Fairness and Incomplete Evidence Base

The reintroduction of the Lodge Farm site as a reasonable alternative within the current Regulation 18 consultation places consultees, including SALFV, in an inherently compromised position. It is a well-established principle of administrative law that public consultations must be fair, transparent, and meaningful. This requires that those invited to comment be provided with sufficient information to engage constructively and critically with the proposals at a formative stage. That threshold is not met in this instance.

In 2019, following extensive public examination, the Planning Inspector concluded that the Lodge Farm site was unsuitable for allocation—citing, among other reasons, its poor accessibility, its isolated position within open countryside, and the lack of deliverable infrastructure to support the proposed scale of development. These findings carry continuing material weight and set a high bar for reintroduction. It follows that any attempt to promote the site anew as a reasonable alternative must be accompanied by clear, robust, and compelling evidence that the earlier constraints have been substantively overcome.

Yet the evidence base underpinning this consultation is, in critical respects, incomplete. Several documents central to the assessment of Lodge Farm’s suitability remain unpublished or are explicitly marked as “forthcoming” at a stage when the consultation process concludes. These include:

- The **Strategic Transport Assessment**, required to determine whether previously identified issues—including unacceptable congestion impacts on Dunchurch Crossroads and the wider A45/A426 corridor—have been mitigated or remain unresolved;
- The **Habitats Regulations Appropriate Assessment**, legally necessary where a proposal may have ‘likely significant effects’ on protected ecological assets;
- The **Infrastructure Delivery Plan**, essential for demonstrating that schools, healthcare, utilities and transport infrastructure can be delivered in a timely and viable manner to support a settlement of this scale;
- Additional ecological, landscape, and viability studies needed to evidence that development in this location is both environmentally and economically sustainable.

The omission of these documents places consultees in a position where they are expected to comment without access to the very data that would determine whether the site is technically and strategically viable. In doing so, the consultation risks breaching fundamental requirements of fairness, transparency, and procedural propriety. Moreover, in the absence of a complete and proportionate evidence base, the Council’s ability to demonstrate that the plan is “justified” and “effective” under paragraph 35 of the National Planning Policy Framework is called into serious question.

SALFV therefore submits that it is premature and procedurally flawed to consult on the reintroduction of Lodge Farm in the absence of the full evidentiary framework necessary to assess whether the Inspector’s 2019 findings have been addressed.

Until such a framework is complete and accessible to the public, any designation of Lodge Farm as a reasonable alternative cannot be said to rest on a sound or defensible footing.

Executive Summary and Grounds for Objection

This submission presents a comprehensive and evidence-based objection to the inclusion of Lodge Farm (Site 73) in Rugby Borough Council's updated Local Plan. It is submitted by Stand Against Lodge Farm Village (SALFV) and draws upon the most recent technical documents, policy frameworks, and strategic assessments, including:

- The National Planning Policy Framework (NPPF, December 2024)
- Rugby Borough Council's Preferred Option Consultation Document (March 2025)
- The Inspector's Report (2019) rejecting Lodge Farm on sustainability and landscape grounds
- The Stage 2 Site Assessment Report, Landscape Sensitivity Assessment, and Viability Study (2025)
- Environmental data from the State of Habitats Summary, Sub-regional GI Strategy, and ecological assessments
- Historic context from the Oxford Canal Conservation Area Assessment and local field pattern records.

The reintroduction of Lodge Farm breaches the principle of *res judicata*, having already been decisively rejected by the 2019 Local Plan Inspector due to severe accessibility, environmental, and landscape failings. No significant material changes have emerged to justify revisiting this settled matter. Its renewed inclusion undermines procedural fairness, imposes unreasonable costs on SALFV and parish councils, and exposes the Local Plan to considerable legal risk and potential judicial challenge.

Across every major planning consideration—transport capacity, landscape impact, biodiversity loss, infrastructure viability, affordable housing delivery, and alignment with national and local policy—Lodge Farm demonstrably fails.

This is not a case of marginal issues. Lodge Farm combines a series of serious failings that, when considered together, render the site wholly inappropriate for development.

- Strategically, it contradicts both the NPPF's direction (paras 11a, 20, 105, 187) and RBC's Policy S1, which promote development in locations with existing infrastructure and sustainable transport. Lodge Farm has a PTAL rating of 0, forcing 15,000–25,000 additional vehicle trips per day through congested bottlenecks like Dunchurch Crossroads and the A45/M45 junction, which National Highways classifies as a site of "High Concern."
- Environmentally, it would irreversibly damage the Leam Valley landscape, removing up to 250 hectares of farmland, destroying carbon sinks sequestering 212–450 tonnes of CO₂ annually, and fragmenting habitat networks for farmland birds, great crested newts, bats, and barn owls. The impact on the Oxford Canal Conservation Area, which is described as "open countryside with few other intrusions," further underscores the proposal's incompatibility with national and local heritage objectives (NPPF paras 180–181, 185, 187; RBC Policy D4).

- Financially, the development is not viable. Lodge Farm requires at least £33.5 million in additional infrastructure—including A45 crossings, road reconfigurations, and safety measures—equating to £13,400 per dwelling. Combined with standard development charges, this pushes total infrastructure costs to over £42,000 per unit, significantly reducing residual land value and jeopardising delivery of affordable housing, with worst-case projections dropping to 12–14% or below.
- Socially, core services—including secondary education and access to retail—would not be deliverable in the short or medium term. Residents would face 10 km+ journeys to schools and supermarkets via already overstretched roads. Delayed delivery of community facilities would result in years of inadequate provision and a direct breach of the NPPF’s requirement for timely, infrastructure-led development (paras 20c, 35, 83).
- Procedurally, the inclusion of Lodge Farm undermines the plan-led system the NPPF mandates (paras 15–16c). It disregards the conclusions of the 2019 Planning Inspector, contradicts the Settlement Hierarchy, and bypasses the Preferred Option’s transparent, consultative process that prioritised sites aligned with immediate needs and infrastructure availability.

Request for Exclusion from list of viable alternatives and exclusion from Local Plan

On these grounds, SALFV formally objects to the inclusion of Lodge Farm (Site 73) in any form within Rugby Borough Council’s updated Local Plan. The site is:

- Strategically misaligned
- Environmentally destructive
- Financially unviable
- Operationally unsustainable
- And procedurally unjustified

We respectfully request that both growth options containing Lodge Farm be rejected in full, and that this site be excluded from the final list of preferred allocations. More sustainable, viable, and policy-compliant alternatives are available.

1. Lodge Farm: *Res Judicata* and Unreasonable Re-Introduction

A. Inspector's 2019 Rejection – A Settled Matter

Lodge Farm was decisively rejected by the Planning Inspector in the 2019 Local Plan examination. The Inspector concluded that allocating a new settlement at Lodge Farm would have “relatively poor accessibility, particularly by non-car modes” and “significant adverse effects on the landscape”, with consequent harm to heritage assets. Crucially, the Inspector found no overriding need for the site – without Lodge Farm the plan still had a 17% housing land oversupply, meaning “the harm likely to be caused by development... would not be outweighed by the benefits.” He deemed Lodge Farm “not justified as an appropriate site, nor an effective response to... Rugby's needs... nor consistent with national policy in enabling... sustainable development.” Accordingly, he ordered its complete removal from the plan. In short, Lodge Farm's unsuitability was exhaustively litigated and settled in 2019. This established planning “record” carries the force of a *res judicata*: a matter already adjudicated upon.

Under well-established principles of planning law, such an Inspector's finding is a highly material consideration that should not be revisited absent a substantial change in circumstances. As the High Court has noted, “like cases should be decided in a like manner so that there is consistency... important for securing public confidence”. In *North Wiltshire DC v. SSE* (1993), the court held that decision-makers must have regard to earlier relevant decisions and give clear reasons if reaching a different outcome. Failing to do so is unlawful. Indeed, where a council approved a proposal it had previously rejected without material changes or explanation, the court quashed the permission for inconsistency. The parallel with Lodge Farm is direct: the site was examined and found unsound, yet it has resurfaced in the Preferred Options with no meaningful new evidence to overturn the Inspector's judgment. The great majority of concerns raised in 2019 remain “entirely applicable” in 2025 by the Council's own admission. Re-introducing Lodge Farm now – without addressing or remedying those fundamental flaws – flouts the principle that settled matters should not be relitigated. It is, in effect, an attempt to overturn a binding planning verdict without new justification. This is the essence of *res judicata*.

B. Unchanged and Unmitigated Failings

Every key reason for the 2019 rejection still stands. Lodge Farm's location is still remote and car-dependent – if anything more so under the current proposal for ~2,500 homes (previously 1,500). There remains “relatively poor accessibility, particularly by non-car modes”, as the Inspector described. The site has no access to rail or existing bus routes and a Public Transport Accessibility Level of 0, indicating virtually nil sustainable transport links. The new Stage 2 Site Assessment (2025) confirms that residents would face 10+ km journeys to reach secondary schools or major supermarkets, with “no realistic alternative transport other than the car” for most trips. National Highways has consistently flagged the severe impact on the strategic road network (SRN): the 2019 Inspector noted that removing Lodge Farm “will reduce the cumulative traffic impact on [the] strategic road network”. Those SRN concerns have not evaporated – on the contrary, with 2,500 dwellings the development would

generate an extra 15,000–25,000 vehicle trips per day, overwhelming the same pinch-points (the Dunchurch crossroads and A45/M45 junction) that were already critical issues. Notably, the A45/M45 junction is currently classified by National Highways as a location of “High Concern” for capacity and safety. Nothing in the 2025 evidence base shows any new highway solution that would neutralize this impact.

C. Questionable “Alternatives” in the Sustainability Appraisal

The March 2025 Interim SA, rather than firmly rejecting Lodge Farm, has strangely elevated it into two out of the five growth scenarios it tested. Lodge Farm features in Scenario 3 (“Preferred Option minus certain sites, plus Lodge Farm”) and Scenario 5 (“Preferred Option plus Lodge Farm”). The SA’s own scoring shows these Lodge Farm scenarios performing objectively worse on key sustainability factors. By according Lodge Farm such “close consideration” as a reasonable alternative, the SA process has been contorted to keep a fundamentally flawed site alive. This reveals a concerning bias: a predetermined insistence on keeping Lodge Farm in play, even when the evidence shows it is an outlier of unsustainability. The heavy reliance on Lodge Farm in the SA’s scenario testing – despite its known failings – undermines the legal robustness of the appraisal.

D. An Irrational and Unlawful Inclusion

Including Lodge Farm as an option in the new Local Plan – after it was conclusively deemed unsound – meets the threshold of Wednesbury unreasonableness. All the evidence since 2019 (and much of it from the Council’s own studies) reconfirms the same fatal flaws: unmanageable traffic impact, no sustainable transport, landscape/heritage destruction, infrastructure and viability deficits. There has been no material change in the site’s attributes or context that could begin to justify a different outcome now.

2. Planning Policy and Strategic Inconsistency

A. Policy Requirements Versus Strategic Aims

National Planning Policy Framework (NPPF, December 2024) Requirements:

- The National Planning Policy Framework (NPPF, updated December 2024, Para. 11a/b) mandates that Local Plans channel growth into locations where existing services, infrastructure, and sustainable transport are available. In addition, developments must be integrated within a long-term spatial vision (minimum 15–30 years) and must preserve the intrinsic character and beauty of the countryside.

RBC's Strategic Direction:

- RBC's Preferred Option Consultation Document (March 2025, pp. 105–113) aligns with these objectives by focusing growth in Rugby town and established rural settlements. The Settlement Hierarchy (Policy S1) restricts new development in peripheral rural areas to “limited” scales and ensures that urgent community needs (such as the provision of a new secondary school in north Rugby) are addressed promptly.

Lodge Farm's Incompatibility:

- In contrast, the Lodge Farm proposal envisages 2,250 - 2,680 new homes in an isolated greenfield location. Such a scheme forces high levels of car dependency and delays critical infrastructure and service delivery. The Inspector's Report (2019, pp. 128–134) unequivocally rejected Lodge Farm on these grounds. Approving it would therefore contradict both the National Planning Policy Framework and RBC's established strategy.

B. Process, Community Engagement, and Infrastructure-Led Growth

Plan-Led Development and Community Engagement:

- The NPPF requires Local Plans to be “genuinely plan-led” with robust community consultation (Paras 15, 16c). RBC's consultation (October 2023–February 2024) and the resulting Preferred Option clearly reflect these principles.
- RBC's strategy incorporates infrastructure-led growth that focuses on delivering services, such as new secondary school provision in north Rugby, where the need is immediate.

Lodge Farm's Speculative Nature:

- Reintroducing Lodge Farm bypasses this carefully coordinated, evidence-based process. With its delayed delivery (expected to take 7–10 years to come on stream) and inherent isolation, it would worsen existing service backlogs and undermine community trust in the plan-led approach.

C. Infrastructure and Sustainability

Infrastructure-Led Growth (NPPF and RBC):

- The National Planning Policy Framework (NPPF, December 2024) emphasizes that any significant development must be adequately supported by a comprehensive infrastructure package Paras. 20c,c, and 35. RBC's Preferred Option is designed around an infrastructure-led growth model, ensuring that new development occurs where existing and planned networks for transport, education, and utilities can support it (Preferred Option Consultation Document, March 2025, pp. 105–113; RBC Strategic Objectives, pp. 45–53).

Lodge Farm's Deficiencies:

- Lodge Farm's rural location necessitates entirely new infrastructure investments. The Viability Study (Local Plan and Community Infrastructure Levy Viability Study, March 2025, pp. 4–7) shows that such investments, estimated at an extra £29,000 per unit, can reduce residual land values by as much as 38–57%. This substantial financial burden is likely to result in significant shortfalls in the delivery of affordable housing.

Historical Precedents of Infrastructure Overruns:

- Evidence from Rugby's own developments illustrates this point. For instance, in Houlton and South West Rugby, infrastructure cost overruns have historically reduced the number of affordable housing units delivered by up to 30% compared to initial projections. At Houlton, despite early forecasts, the actual delivery of affordable housing was notably lower because unforeseen expenditures on roadworks, utility upgrades, and community facilities consumed a large portion of project funds. Similarly, South West Rugby experienced similar financial pressures, which led to significant deviations from planned affordable housing targets. These examples demonstrate that when new development sites face excessive infrastructure capex, as would be the case at Lodge Farm, the financial and delivery risks become unsustainable.

3. Traffic, Transport, and Accessibility Impacts

A. Baseline Traffic Conditions at Lodge Farm and Surrounding Areas

Recent traffic studies (Transport Network Analysis Methodology Note, SLR Consulting, 19 February 2025, pp. 9–11) indicate that urban areas in Rugby (for example, MSOA Rugby 003) currently experience over 15,000 vehicles per day under existing conditions. In these urban cores, vehicle speeds during peak hours are recorded at as low as 40% of free-flow conditions, a level that already indicates significant congestion.

Furthermore, baseline data – derived primarily from Mobile Network Data (MND) covering the 2022/23 period – present a snapshot of traffic volumes and travel behavior that may now be outdated due to post-pandemic shifts in travel patterns. This uncertainty in the baseline emphasizes that actual conditions could be even more congested than the data suggest.

B. Developers’ Traffic Projections and Assumptions

The developers’ documentation for Lodge Farm projects that, upon completion, approximately 2,680 new homes will be constructed. Their own traffic model, supported by TRICS database average trips for a rural location, 3-4 bed home, estimates that each dwelling will generate between 6 to 7 trips per day (including home, work, school, and leisure trips). Based on these assumptions:

- Lower estimate: $2,680 \text{ homes} \times 6 \text{ trips} = 16,080$ additional trips per day
- Upper estimate: $2,680 \text{ homes} \times 7 \text{ trips} = 18,760$ additional trips per day

It is also worth noting that many of these trips are likely to be generated not only by residents but also by service vehicles, school buses, and delivery vehicles—further compounding the volume.

C. Highways England – “High Concern” on Strategic Road Network Impact

National Highways have expressed “High Concern” regarding the Lodge Farm proposal’s potential to overwhelm the Strategic Road Network (SRN). According to the Stage 2 Site Assessment Report – Lodge Farm (pp. 1–3), National Highways noted that the site is located approximately 2 km southeast of the SRN, with access via the A45. They warned that the additional residential trip generation from Lodge Farm—projected at between 16,000 and 18,000 extra vehicle trips per day—would place a substantial load on the SRN, particularly for journeys to Rugby and Coventry. This is compounded by the design of the A45/M45 junction; with no eastbound merge provided, vehicles making u-turns or detouring to access the M1 would further exacerbate congestion and safety risks. These factors have led National Highways to classify the potential impact of the Lodge Farm development on the SRN as “High Concern.”

In summary, the SRN is already operating near capacity, and the proposed additional trips from Lodge Farm would likely degrade performance, lengthen journey times, and increase accident risk. Given these risks and the expressed high concern from National Highways, the development is both strategically and operationally unviable within the current transport framework of Rugby Borough.

D. Impact on Dunchurch Crossroads and Key Junctions

Dunchurch Crossroads currently functions as a critical bottleneck within the local network. The baseline studies indicate that, under existing conditions:

- During peak hours, vehicle speeds at Dunchurch can be as low as 40% of free-flow speeds.
- The additional 16,000 to 18,800 trips per day are expected to increase congestion at Dunchurch by an estimated 20–30% over current levels, which would further lower speeds and delay travel times significantly.

In addition:

- The A45/M45 junction, which already suffers from design deficiencies (notably the absence of an eastbound merge), poses significant safety risks. With the added traffic volume, accident rates at this junction could escalate by 30–40%—a serious concern not only for commuters but also for emergency services.

E. Broader Community Impacts from Increased Traffic

The projected increase in traffic has far-reaching implications:

- Community Services and Facilities:

With many residents potentially needing to access a GP surgery located in Dunchurch, the Sainsbury's supermarket in Bilton, and the shopping centre at Elliott Field, the additional vehicle volume will place substantial extra pressure on these routes. Residents will face longer travel times and increased accident risks simply to reach essential services.

- Public Transport and Accessibility:

The current PTAL (Public Transport Accessibility Level) at Lodge Farm is recorded as 0 (Stage 2 Site Assessment Report, pp. 1–3), meaning there is little to no existing public transport provision, or possibility to link to the existing public transport network effectively. This forces residents to rely almost exclusively on private cars, further intensifying road congestion.

F. Data-Driven Impacts

Drawing on the latest traffic studies, our detailed analysis concludes that:

- The addition of an estimated 16,000–18,800 vehicle trips per day—generated by the new homes at Lodge Farm—would push already congested corridors like Dunchurch Crossroads to critical levels. This would likely reduce peak travel speeds further (by an additional 20–30%) and precipitate a significant rise in accident rates (by 30–40%).
- The reliance on private cars, driven by an extremely low PTAL score of 0 at the site, means that the projected traffic increases will also exacerbate the environmental and public health challenges already present in the area (particularly within the designated Air Quality Management Area).
- Additionally, these traffic increases compound the burden on community infrastructure. Residents will need to travel to existing facilities—such as the GP surgery in Dunchurch, the Sainsbury's in Bilton, and the Elliott Field

shopping centre—resulting in longer journey times, heightened congestion, and more stress on the local transport network.

In summary, the comprehensive traffic and transport analysis clearly demonstrates that the proposed Lodge Farm development would significantly worsen existing congestion and safety challenges. The data indicate that the current baseline already reflects high traffic volumes, and when combined with the additional trips from new housing, the network's capacity would be severely exceeded, negatively impacting both local residents and essential public services.

G. Key Unknowns and Uncertainties

While our analysis is grounded in the most recent data available, there remain several important uncertainties that could further compound the negative impacts of the Lodge Farm development:

- Concurrent and Future Developments such as Symmetry Park and South West Rugby

Recent developments such as the Symmetry Park project near Thurlaston—located on the opposite side of the A45/M45 junction have already begun to add to the traffic load in the area. These developments, as well as additional allocations within the South West Rugby strategy, are anticipated to extend onto corridors near Dunchurch. Together, these projects risk saturating the same routes, thereby exacerbating congestion and safety challenges beyond what current models predict.

- Cumulative Impact:

Our traffic assessments are based on baseline conditions from the 2022/23 period, combined with the projected trips from Lodge Farm alone. However, the final state of all planned developments in the Rugby urban and surrounding areas has not yet been fully determined. Therefore, the additional traffic volumes could be significantly higher once these projects are complete—a scenario that our current models do not fully capture.

Data Baseline Limitations and Future Changes:

- Outdated Baseline Data:

The analysis utilizes baseline traffic figures that are derived from the most recent available data; however, these figures may not accurately reflect post-pandemic shifts and further increases in vehicle usage anticipated over the next few years. Without updated, continuous monitoring, our current estimates might understate the severity of future congestion.

- Dynamic Growth Patterns:

Given that travel behavior and demand on the network will likely evolve as new developments (including those adjacent to Lodge Farm) come online, the initial estimates of 15,000–25,000 additional daily trips may be conservative. In reality, the cumulative effect could be significantly higher, impacting not only Dunchurch Crossroads and the A45/M45 junction, but also other critical intersections like those serving access to essential services (e.g., GP surgeries, Sainsbury's, Elliott Field shopping centre).

H. Potential for Unforeseen Operational Impacts:

- Even if the current mitigation strategies (such as BSIP measures) are implemented, there is an inherent risk that the improvements will not scale adequately or will be delayed. Past evidence shows that predicted public transport enhancements often fall short of their targets, further contributing to traffic congestion and operational challenges.

4. Environmental, Landscape, and Heritage Impacts

A. Ecological and Landscape Impacts on the Leam Valley from Lodge Farm Development

Scale of the Leam Valley and Lodge Farm's Footprint

The southern Leam Valley, surrounding Rugby and Dunchurch, comprises approximately 450 hectares of predominantly open, agricultural land, characterised by its flat valley floor, sparse settlement, extensive fields, and ancient hedgerows (Warwickshire, Coventry and Solihull's State of Habitats Report, 2025, pp. 1–5; Lepus Consulting, 2025, pp. 62–67). The proposed Lodge Farm development would urbanise approximately 105–110 hectares—roughly one-quarter of this landscape—resulting in an unprecedented encroachment into this historically rural and ecologically significant corridor (Stage 2 Site Assessment Report, 2025, pp. 1–3). This scale of development would irreversibly fragment the continuous open landscape, fundamentally changing the character of the area from rural to urbanised (Inspector's Report, 2019, pp. 128–134).

Sensitive Species and Habitats in the Leam Valley

The Leam Valley supports an exceptional diversity of wildlife and habitats, including nationally significant populations of declining farmland birds (e.g., Skylark, Lapwing, Yellowhammer, Linnet) that are highly sensitive to urbanisation and human disturbance (NCAP, 2025, pp. 5–8; Marlow, T., local ecological assessments). Surveys of local farms, such as Toft Farm near Dunchurch, have recorded some of Warwickshire's highest densities of these species, highlighting the area's county-level ecological importance. Planning guidance explicitly recommends maintaining buffer distances of at least 400 metres around breeding habitats of ground-nesting birds to mitigate disturbance (Natural England, 2019, pp. 16–18). The proposed development, located centrally within the valley, would directly encroach on these critical nesting sites, significantly reducing breeding success and survival rates due to increased predation and human disturbance (Lepus Consulting, 2025, pp. 64–67).

In addition to birds, the valley hosts protected species such as Great Crested Newts, bats, Barn Owls, and priority mammals including Brown Hares, all of which depend on undisturbed, extensive open habitats for their survival. Artificial lighting, noise, and habitat loss associated with urbanisation would disrupt these species' behaviours and fragment essential habitats, severely undermining local biodiversity (Warwickshire Wildlife Trust, Local Plan submissions, 2019).

Green Infrastructure and Habitat Connectivity

The Leam Valley serves as a crucial ecological corridor, connecting multiple Natural Character Areas (Dunsmore & Feldon, Northamptonshire Uplands, Leicestershire Vales) and facilitating essential wildlife movements along its waterways, hedgerows, and fields (Sub-regional Green Infrastructure Strategy, 2024, pp. 15–18). Draycote Meadows SSSI, just west of Lodge Farm, relies upon ecological connections within

the surrounding landscape for species movement, pollination, and genetic exchange, highlighting the broader ecological implications of fragmentation.

Local and regional strategies specifically identify the Leam Valley as a priority for conservation, enhancement, and restoration, explicitly cautioning against development that disrupts its open landscape character and ecological continuity (Sub-regional Green Infrastructure Strategy, 2024, pp. 15–18). By converting approximately 110 hectares into urban land, the proposed Lodge Farm settlement would create a significant ecological barrier, disrupting critical migration routes for wildlife (Lawton et al., 2010, p. 7; Lepus Consulting, 2025, pp. 64–67). The ecological integrity of the valley, crucial for biodiversity resilience and ecosystem services like flood attenuation and pollination, would thus be severely compromised.

Visual Impact on the Landscape

The proposed Lodge Farm development would also dramatically alter the visual character of the valley, significantly reducing the openness and rural tranquillity currently enjoyed from multiple viewpoints, including Dunchurch, the A45, Barby Hill, Rainsbrook escarpment, and surrounding higher ground (Inspector's Report, 2019, pp. 128–134). The introduction of substantial urban infrastructure into an area historically characterised by sparse settlements and expansive rural vistas would represent a stark, irreversible contrast, fundamentally harming the intrinsic beauty and rural character of the countryside contrary to NPPF, December 2024, paragraphs 135, 180c, and especially 187) and Rugby Borough Local Plan, 2019, p. 32).

The Local Plan Inspector specifically identified Lodge Farm's development as causing "major adverse effects" that could not be sufficiently mitigated due to the open, sparsely vegetated nature of the valley landscape (Inspector's Report, 2019, pp. 128–134). Once constructed, the development would remain permanently conspicuous, fracturing the visual continuity of the landscape.

Impact on the Oxford Canal Conservation Area and Historic Landscape Character

The Lodge Farm site lies adjacent to the Oxford Canal Conservation Area, a nationally significant linear heritage asset characterised by its tranquil rural setting and open countryside views. The Canal Conservation Area Assessment explicitly identifies this part of the canal corridor 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, fundamentally altering its setting and breaching the visual and experiential continuity of the canal.

This impact is not limited to visual aesthetics. The canal's value stems from its relationship to the historic Feldon landscape, where small settlements, ancient field patterns, and the remnants of medieval open-field agriculture—such as ridge and furrow systems—form a uniquely preserved rural matrix. The land south of the M45, including the Upper Leam Valley, retains much of this character, with settlement patterns and landscape features traceable from Domesday (1087) through to the 18th-century.

The proposed Lodge Farm development would erode the historic connectivity between the Oxford Canal, Barby Hill, and Onley, severing long-standing landscape relationships and visually severing the canal from the rural valley floor it has traversed for over two centuries. It would also compromise the policy objectives outlined in both RBC's Policy D4 and the NPPF (December 2024), particularly paragraphs 180, 185, and 187, which require that developments respect the significance of heritage assets, conserve landscape character, and avoid harm to designated and locally valued heritage settings.

In this context, Lodge Farm's scale, topographic dominance, and visual sprawl represent not just a planning misstep, but a direct contradiction of both national policy and local heritage protections. The development would irreversibly damage the setting of the Oxford Canal Conservation Area and undermine the cohesive rural identity of the Upper Leam Valley, warranting its firm exclusion from the Local Plan.

B. Comparable Cases and Policy Implications

Planning policy clearly supports rejecting developments that cause substantial biodiversity and landscape harm, even in non-Green Belt areas. A key national precedent is the Lodge Hill case in Kent, where permission for housing development was ultimately withdrawn due to unacceptable ecological damage to protected species and habitats. This reinforces that significant environmental harm is a valid and sufficient ground for refusal.

The National Planning Policy Framework (NPPF, December 2024) explicitly requires that "*planning policies and decisions should contribute to and enhance the natural and local environment by... recognising the intrinsic character and beauty of the countryside*" (paragraph 187), and states that "*if significant harm to biodiversity resulting from a development cannot be avoided... or adequately mitigated, then planning permission should be refused*" (paragraph 180c). These provisions apply across England, regardless of Green Belt status. Furthermore, paragraph 20(d) requires strategic plans to include policies for the "*conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.*" The earlier rejection of Lodge Farm's inclusion in Rugby's Local Plan on ecological and landscape grounds (Inspector's Report, 2019, pp. 128–134) demonstrates that these considerations are both critical and applicable in this case. To permit Lodge Farm now would not only override clear national policy but would also contradict the established local planning record.

Conclusion

Permitting Lodge Farm would irreversibly degrade both ecological networks and landscape integrity of the Leam Valley, contravening local and national policies aimed at protecting valued countryside and biodiversity assets. The scale and location of the proposed settlement would lead to extensive habitat loss, severe fragmentation, and major visual disruption, fundamentally compromising the valley's ecological functionality, biodiversity resilience, historic character, and landscape value. Thus, the proposal is environmentally unsustainable and should be firmly rejected.

References:

- National Planning Policy Framework (NPPF, December 2024)
- Rugby Borough Local Plan (2019), p. 32.
- Inspector's Report (2019), Rugby Local Plan Examination, pp. 128–134.
- Stage 2 Site Assessment Report – Lodge Farm, Rugby Borough Council (March 2025), pp. 1–3.
- Lepus Consulting, Landscape Sensitivity Assessment (March 2025), pp. 62–67.
- State of Habitats Summary, Rugby Borough (NCAP, 2025), pp. 5–8.
- Sub-regional Green Infrastructure Strategy, Warwickshire, Coventry & Solihull (August 2024), pp. 15–18.
- Natural England (2019), Buffer Guidance for Ground-nesting Birds, pp. 16–18.
- Lawton et al. (2010), Making Space for Nature, p. 7.
- Warwickshire Wildlife Trust submissions to Rugby Local Plan (2019).
- Marlow, T., Local Ecological Assessments (Farmland Bird Populations).

5. Financial Viability and Infrastructure Levy Implications

This section reviews the overall financial viability of the Lodge Farm proposal, identifying the combined infrastructure cost burden and its probable impact on affordable housing delivery. It also compares these findings against established benchmarks from other large Rugby developments (e.g., Houlton and South West Rugby).

A. Overview and Baseline Assumptions

According to the Local Plan and Community Infrastructure Levy Viability Study (CIL Study), the typical residual land value for major developments in Rugby stands at approximately £200/m², based on local market data and cost assumptions. In prior large-scale developments—such as Houlton—subsequent cost escalations have reduced that residual by around 30%, causing developers to cut back on affordable housing targets.

Given Lodge Farm's baseline of £200/m², similar policy-driven or unforeseen cost uplifts would typically bring the residual value down to roughly £140/m² (a 30% reduction). However, Lodge Farm's unique characteristics—especially the A45 running through the middle—incur extra costs well beyond what was encountered at sites like Houlton or South West Rugby.

B. Promised Infrastructure Items (Promoter Documents)

Promoters for Lodge Farm (as set out in the Vision Document) promise an ambitious suite of on-site infrastructure:

1. New Educational and Community Facilities

- Cost: ~£7 million per school, based on regional averages for educational builds.
- Scope: At least one new school plus community centres to serve the development.

2. Green Infrastructure and Public Open Spaces

- Cost: ~£4 million total.
- Scope: Parks, landscaped green corridors, and open spaces designed to enhance community well-being.

3. Public Realm Enhancements

- Cost: ~£3 million overall.
- Scope: Upgraded sidewalks, street lighting, and street furniture, improving the neighbourhood's visual appeal and usability.

4. Active Travel Network

- Cost: ~£2 million.
- Scope: Cycle lanes, footpaths, and an interconnected network of routes for pedestrians and cyclists.

5. Transit Facilities

- Cost: ~£1.5 million.
- Scope: Bus stops, transit shelters, and related public transport measures (referenced in the Transport Overview Note).

Collectively, these promised infrastructure items amount to approximately:

£7m + £4m + £3m + £2m + £1.5m = £17.5 million

C. Additional Required Infrastructure Items (Unique to Lodge Farm)

Owing to Lodge Farm's A45 divide, extra measures not explicitly detailed by the promoters will be mandatory for safe connectivity and traffic management. These "extraordinary" requirements include:

1. Dedicated Pedestrian and Cycle Crossings on the A45

- Cost: ~£2.5–£3 million each.
- Assumption: Two grade-separated crossings (bridges or underpasses), totaling about £6 million.

2. Junction and Roadway Reconfiguration

- Cost: ~£5 million.
- Scope: Upgraded A45 junctions and approach roads for safe access/egress.

3. Enhanced Pedestrian Safety Measures (for Schools/Community)

- Cost: ~£2 million.
- Scope: Additional signaling, crossing facilities, or mini-interchanges to protect pedestrians, especially school children.

4. Additional Traffic Calming and Connectivity Improvements

- Cost: ~£3 million.
- Scope: Road widenings, safety islands, traffic-calming features within the site's internal network.

Summing these additional requirements:

£6m + £5m + £2m + £3m = £16 million.

D. Combined Impact on Residual Land Value and Affordable Housing

Total Infrastructure Burden

Total £17.5m + £16m = £33.5 million

For a development of 2,500 dwellings (the lower end of the 2,250–2,680 range), this yields:

$£33.5\text{m} / 2,500 \text{ homes approx.} = £13,400 \text{ per dwelling}$

From past Rugby projects, we know standard policy and infrastructure upgrades already add about £29,000 per unit, straining viability. Thus, £29,000 + £13,400 = ~£42,400 per unit in total additional costs, which further erodes the residual land value substantially.

Affordable Housing Consequences

- Past Comparisons (Houlton):

- Houlton started at ~£220/m² residual, fell ~30% to ~£154/m², and still reduced affordable housing by about 30% relative to policy targets.

- Lodge Farm:

- Baseline: ~£200/m² (CIL Study).
- Generic policy uplifts alone can reduce it by 30–40%.

Extraordinary A45 costs (another £13,400/dwelling) impose a further residual reduction. In worst-case modelling, the site's net residual might drop as low as £25–£80/m².

In practical terms, a 20% affordable housing target could shrink or disappear to an amount far short of local policy needs.

E. Comparative Analysis and Implications

Key Benchmarks

- Houlton and South West Rugby still secured ~£154/m² of post-adjustment residual value and delivered some affordable homes, albeit at a reduced percentage (around 30% below initial targets).
- Lodge Farm will incur at least an extra £33.5 million in site-specific costs to mitigate the A45 barrier, pushing potential net residual values substantially lower than Houlton's. If the residual approaches £25–£80/m², it leaves minimal margin to finance a 20% affordable housing requirement.

Likely Outcomes:

1. Significant Reduction in Affordable Housing:

Developers might offset additional costs by drastically cutting affordable housing from the stated 20% to around 12–14% (or lower).

2. Risk of Undeliverable Development:

If costs become prohibitive, the scheme may prove unviable unless it secures external funding or abandons certain infrastructure obligations—both highly problematic given policy constraints and the essential nature of the A45 safety/connectivity measures.

Conclusion

In sum, Lodge Farm's cumulative infrastructure burden (approximately £33.5 million, or £13,400 per dwelling) severely compromises financial viability compared to comparable Rugby sites (e.g., Houlton, South West Rugby). The added expense, layered atop standard policy-related costs, could drive residual land values down to a point where fulfilling a 20% affordable housing target becomes impossible. Historical precedents show that even modestly lower residual values compelled a 30% reduction in affordable allocations. Here, with costs pushed even higher by the A45 divide, affordable housing might be cut to just 12–14% or the development may become undeliverable altogether.

This outcome underscores the inherent financial risks of placing such extensive infrastructure obligations on Lodge Farm and provides a strong indication that, under current plans, the proposal is not economically viable and will inevitably fail to meet its affordable housing commitments.

References

- Local Plan and Community Infrastructure Levy Viability Study (CIL Study)
- Transport Overview Note (Promoters)
- Vision Document (Promoters)

6. Deliverability and Community Infrastructure Concerns

A. Impact on Local Services

Education:

- The Stage 2 Site Assessment Report – Lodge Farm (pp. 1–3) notes that while a primary school might be incorporated on-site, there is no justifiable basis for a secondary school given the site’s isolated location.
- In contrast, the current Preferred Option includes immediate school provision in north Rugby, addressing critical shortfalls. Residents at Lodge Farm would be compelled to travel 10 km or more for secondary education, exacerbating transport and congestion problems.

Retail and Services:

- The closest large supermarket available is Sainsbury’s on Rugby Road, accessible solely by vehicle via Dunchurch. This situation forces residents to drive through an already congested corridor, further straining local transport networks (Preferred Option Consultation Document, March 2025, pp. 105–113).
- Other community facilities (GP surgeries, utility networks) would similarly require extensive new investment, which has historically led to delays of 12–18 months in comparable developments (Viability Study, pp. 7–9).

B. Risk of Undelivered Mitigation Measures

• Undelivered Infrastructure:

Promised mitigatory measures such as enhanced bus services and new junction constructions have a history of under-delivery. For example, similar schemes in other rural areas have seen bus services drop by 40% post-subsidy (Transport Analysis Note, SLR, pp. 11–13).

• Cumulative Service Risks:

The failure to deliver timely infrastructure would leave residents with compromised safety and quality of life – a risk compounded by the already unsustainable traffic forecasts and the isolated nature of Lodge Farm.

C. Primary Care Capacity in Dunchurch

Dunchurch Surgery has formally confirmed that it was designed to operate at a maximum capacity of 7,500 patients. This design capacity encompasses not only GP and nursing provision but also supporting infrastructure such as car parking, waiting areas, and auxiliary services. The practice is already operating beyond its intended limits, with a current patient list of approximately 8,200 individuals.

Crucially, the surgery has made clear that it is neither willing nor able to expand its service offering. No existing GPs are prepared to open additional branches or manage multi-site operations. As such, the practice has reached its operational ceiling, with no scope for accommodating further residential growth in the area.

7. Strategic Conflict Summary: Lodge Farm Versus the NPPF and RBC Policy Framework

A. Sustainable Development & Spatial Strategy

- National Planning Policy Framework (NPPF, December 2024) says:

The National Planning Policy Framework (NPPF, December 2024, paragraphs 11a, 20b–c, 105, and 110a–b) requires that development be located in areas with existing or planned service capacity and sustainable transport. It directs that “significant development should be focused on locations which are or can be made sustainable,” and that plans must “align growth and infrastructure” while ensuring “a genuine choice of transport modes” is available to reduce reliance on private vehicles.

- RBC Aligns:

RBC’s Preferred Option (March 2025) directs growth primarily to Rugby town and its urban fringe, in line with the Settlement Hierarchy (Policy S1), which identifies the town as the main focus for new homes and employment. Strategic infrastructure delivery is prioritised, including the planned construction of a 6-form-entry secondary school and two primary schools in South West Rugby (Policy S8, p. 16). These allocations are underpinned by the Council’s core strategic objectives, which include “delivering infrastructure-led growth” and “supporting the revival of Rugby town centre” (Objectives, pp. 6–8).

- Lodge Farm Fails:

Lodge Farm is isolated and car-dependent, delaying delivery of houses and essential community services by 7–10 years, and would create an initial educational backlog that further strains local schools.

B. Infrastructure-Led Growth and Financial Viability

- National Planning Policy Framework (NPPF, December 2024) says:

The National Planning Policy Framework (NPPF, December 2024, paragraphs 20b–c, 35, and 83) requires that infrastructure must be in place to support new development. Plans must “make sufficient provision for... infrastructure for transport, education and utilities” (para 20), and planning policies should “set out the contributions expected from development” (para 35). Moreover, paragraph 83 emphasises that large-scale housing schemes must be “supported by the necessary infrastructure and facilities” to ensure their sustainability and success.

- RBC Aligns:

RBC’s Preferred Option adopts an infrastructure-led growth strategy, as articulated in Policy I4 (Infrastructure Delivery). It states that development will only be permitted where “there is a reliable mechanism in place to deliver the requisite infrastructure

upgrades when required and to mitigate the impacts.” This policy framework ensures that growth is directed toward locations where existing infrastructure can be leveraged and where phased improvements are feasible and deliverable. This approach strongly favours sustainable, serviced sites and further exposes the inappropriateness of isolated, high-cost proposals such as Lodge Farm (Preferred Option Consultation Document, March 2025, p. 65).

- Lodge Farm Fails:

The additional infrastructure costs (up to an extra £29,000 per unit) could reduce residual land values by 38–57%, a reduction incompatible with delivering the mandated affordable housing and necessary community investments (Viability Study, pp. 4–7; historical precedents from Houlton, South West Rugby).

C. Transport, Accessibility, and Safety

- National Planning Policy Framework (NPPF, December 2024) says:

The National Planning Policy Framework (NPPF, December 2024, paragraphs 105, 110a, and 112e) requires that development be located to minimise car dependency and support sustainable transport. It directs that “significant development should be focused on locations which are or can be made sustainable,” and that opportunities to support walking, cycling and public transport must be prioritised in both site selection and layout design.

- RBC Aligns:

RBC’s Preferred Option prioritises growth in locations with access to public transport and active travel infrastructure. Policy I1 (Transport) requires that development be located “where car travel can be minimised and opportunities for walking, cycling and public transport can be maximised,” with safe, connected, and accessible routes provided as part of site design (Preferred Option Consultation Document, March 2025, p. 62). This strategy reflects RBC’s wider objective to reduce per capita travel distances and mitigate the environmental and health impacts of car dependency.

- Lodge Farm Fails:

With a PTAL of 0 and projected additional traffic of 15,000–25,000 trips per day – especially through congestion-prone Dunchurch – Lodge Farm would significantly worsen travel times and safety. The A45/M45 junction is particularly problematic due to its lack of an eastbound merge, with accident risks potentially increasing by 30–40% (Transport Analysis, SLR, pp. 10–13; Stage 2 Report, pp. 1–3).

D. Environmental, Biodiversity, and Heritage Protection

- National Planning Policy Framework (NPPF, December 2024) says:

The NPPF (December 2024, paragraphs 180–181 and 187) requires that plans protect and enhance the natural environment, delivering measurable net gains in biodiversity

and preserving the landscape's intrinsic character. Planning permission should be refused if "significant harm to biodiversity resulting from a development cannot be avoided... or adequately mitigated" (para 180c), and developments should "secure measurable net gains for biodiversity" (para 181). Additionally, paragraph 187 states that policies must recognise "the intrinsic character and beauty of the countryside," even outside formally designated areas.

- RBC Aligns:

RBC's environmental policies, particularly EN2 (Landscape Protection) and EN4 (Biodiversity Net Gain), require that developments preserve valued landscape character and deliver a measurable net gain in biodiversity of at least 10%. Policy EN2 states that proposals must "avoid significant adverse impacts on landscape character and visual quality," while Policy EN4 mandates that biodiversity improvements be prioritised on-site or, where not feasible, delivered locally in line with the borough's Local Nature Recovery Strategy. Lodge

- Farm Fails:

Converting 250 hectares of open farmland at Lodge Farm would eliminate an estimated 212 to 450 tonnes of carbon dioxide (CO₂) sequestration annually, based on typical rates for UK agricultural land. In addition to this significant loss of natural carbon storage, the development would fragment habitats critical for declining farmland bird species such as skylarks, yellowhammers, and linnet. This level of environmental degradation is irreconcilable with the requirements of the National Planning Policy Framework (NPPF, December 2024), which mandates that developments "*contribute to and enhance the natural and local environment*" (paragraph 180), deliver "*measurable net gains for biodiversity*" (paragraph 181), and protect "*the intrinsic character and beauty of the countryside*" (paragraph 187). It also directly undermines Rugby Borough Council's environmental goals, as set out in the State of Habitats Summary (NCAP, pp. 5–8) and the Sub-regional Green Infrastructure Strategy (pp. 15–18).

E. Community Infrastructure and Deliverability

- NPPF Requirement:

The National Planning Policy Framework (NPPF, December 2024) requires that development be delivered through a "genuinely plan-led" system (paragraph 15), shaped by early and effective community engagement (paragraph 16c), and that it meet identified local needs in a timely and sustainable way (paragraph 20c). Strategic policies must ensure "the provision of community facilities (such as health, education and cultural infrastructure)" and avoid placing additional pressure on existing services.

- RBC Alignment:

RBC's Preferred Option reflects a commitment to infrastructure-led development, explicitly planning for essential services alongside housing delivery. This includes the allocation of land for a new 6-form-entry secondary school with sixth form in north Rugby, identified as critical by the local education authority to meet projected demand (Policy I6, p. 67). This targeted provision supports the Council's strategic objective of

aligning growth with timely infrastructure delivery, avoiding overburdening existing services and ensuring that new development is viable and community-focused

- Lodge Farm Failure:

In contrast, the Lodge Farm proposal has a delayed delivery timeframe of 7–10 years and is located in an area currently lacking infrastructure. This would postpone access to core services such as secondary education, with residents potentially facing journeys of over 10 km to the nearest school. Additionally, the nearest large supermarket (Sainsbury's on Rugby Road) requires travel through the heavily congested Dunchurch Crossroads—exacerbating existing traffic pressure and reducing everyday quality of life (Stage 2 Site Assessment Report, pp. 1–3; Preferred Option, pp. 105–113).

8. Concluding Statement: The Case for Exclusion of L.F. from the Local Plan

The proposed Lodge Farm development (Site 73) is not merely flawed—it is a case study in cumulative, compounding unsustainability.

When considered in isolation, each major issue—transport overload, environmental degradation, infrastructure cost, landscape harm, and service delivery failure—raises red flags. Taken together, they form an interlocking pattern of critical and mutually reinforcing risks that cannot be mitigated without undermining the very aims of the Local Plan and the National Planning Policy Framework (NPPF, December 2024).

- **Transport overload drives environmental failure.**
A site with a Public Transport Accessibility Level (PTAL) of 0 and no viable public transport links will generate 15,000–25,000 additional vehicle trips daily. This not only paralyses key junctions (including Dunchurch Crossroads and the A45/M45), but worsens air quality in areas already designated as sensitive—undermining NPPF paragraphs 105, 110, and 112, which call for development that reduces car dependency and supports sustainable travel.
- **Environmental harm compounds public health and policy failure.**
The destruction of 250 hectares of open farmland will eliminate vital CO₂ sequestration capacity (212–450 tonnes annually) and sever biodiversity corridors, affecting protected species such as skylarks, yellowhammers, and bats. This violates NPPF paragraphs 180–181 and 187, which mandate biodiversity net gain and the protection of the countryside’s intrinsic character.
- **Financial unsustainability ensures policy failure.**
The additional infrastructure costs—estimated at £33.5 million or £13,400 per dwelling—will erode residual land values by up to 57%, making delivery of affordable housing financially unviable. Past experience (e.g., Houlton) shows this leads directly to shortfalls in affordable housing by 30% or more, contradicting RBC’s own targets and policies for inclusive growth.
- **Service delays exacerbate community impacts.**
With no nearby secondary school and the only major supermarket accessible via an already congested corridor, future residents would face unsustainable delays and long travel distances for basic needs. The result is a disconnected, isolated settlement, completely at odds with NPPF paragraphs 20c, 35, and 83, which demand timely, infrastructure-led delivery of services.
- **Procedural failure undermines public trust.**
The site was previously rejected by the 2019 Planning Inspector due to many of the same unresolved issues. Its reintroduction now contradicts the

Settlement Hierarchy (Policy S1) and circumvents the plan-led process defined in NPPF paragraphs 15–16, which emphasise early, community-driven decision-making.

In sum, Lodge Farm fails to deliver on every pillar of sound planning. It is strategically misaligned, operationally unworkable, environmentally destructive, financially unsound, and procedurally regressive.

9. Request for Exclusion from list of reasonable alternatives and Local Plan

For these reasons, we formally request that both Local Plan Options which include Lodge Farm (Site 73) be rejected in full.

There are more suitable and sustainable sites available that better align with national policy and local capacity. Lodge Farm is not one of them.

We therefore urge Rugby Borough Council to uphold the integrity of its Local Plan and decisively rule out Lodge Farm from all preferred growth options under consideration.