



**WRITTEN REPRESENTATIONS TO
RUGBY BOROUGH COUNCIL**

**LOCAL PLAN REGULATION 18
PREFERRED OPTIONS
CONSULTATION**

**ON BEHALF OF J MARINE LIMITED
(DUNCHURCH POOLS)**

May 2025

Our Ref: CLR380

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Date:	May 2025
Project Number/Doc Reference:	CLR380 / 1

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EXECUTIVE SUMMARY

These representations are submitted on behalf of J Marine Ltd in response to the Rugby Borough Local Plan regulation 18 Preferred Options consultation. J Marine supports the Council's approach taken through the Preferred Options; but objects to the inclusion of the Lodge Farm (Site 73) Development as a reasonable alternative within the accompanying Sustainability Appraisal.

J Marine Ltd owns and operates Dunchurch Pools, an inland Marina located on the Oxford Canal approximately 5km south of Rugby town. The Marina is set within the open countryside of the Leam and Rainsbrook valleys, with the prisons at Onley, on its northern boundary, the only neighbouring development. The rural location, with its closeness to nature and its tranquillity, is one of the key reasons for the Marina's success, with customers seeking leisure time away from their hectic daily lives.

Dunchurch Pools is an inland waterways facility, of national significance. Along with the Oxford Canal itself, the Marina is Rugby Borough's key inland boating tourism facility. The sector nationally £1.54billion GVA / 80,500 jobs and locally supporting numerous local shops, pubs, restaurants, visitor attractions, transport companies and boatyards. The Marina also employs 20 staff directly, growing to 50+ as consented phases 2 & 3 are completed, along with numerous local contractors and suppliers. Dunchurch Pools also provides sustainable community access to the countryside and its 88 acre site has been assessed as a major contributor to local Biodiversity Action Plans.

The 633 acre Lodge Farm site lies immediately adjacent to Dunchurch Pools to the south, west and northwest. The proposed 2680 houses and employment/retail/education/health/sport 'new settlement' development would result in the urbanisation of Dunchurch Pools' setting.

The representations generally support the approach that the Council has taken in preparing the Preferred Options draft and suggest some enhancements. This includes:

- Support for the level of housing requirement and approach to housing delivery, agreeing with the Council's conclusions that there is no justification for increasing housing delivery to address unmet needs from neighbouring authorities or affordable housing needs;
- Supporting the approach to the landscape and environment in policy, whilst suggesting modifications to recognise that landscape character extends beyond the Borough's boundaries, and to acknowledge the influence of Dunchurch Pools on the landscape;
- Suggesting modifications to the Rural Economy policy, to better recognise the role of tourism and the importance of Dunchurch Pools to the economy of the Borough. Also to ensure that policy supports and does not unduly restrict future expansion and diversification of the Marina, whilst directing other canal-based developments to locations that are at or adjacent to existing settlements;
- Proposing modifications to recognise the role of the Marina as a community facility, and supporting the access to the canal network and countryside that the development provides;
- Suggesting modifications in respect of historic environment, including recognising the Oxford Canal as a heritage asset and recognising the potential impact of development in the Borough on heritage assets beyond the administrative boundary.

The Sustainability Appraisal and Stage 2 Site Assessment in relation to the assessment of Lodge Farm (site 73) as a 'reasonable alternative' are not considered to be sound or justified on the basis of the following matters:

- Allocation of Lodge Farm in the now adopted Rugby Local Plan 2011-2031 was rejected by the inspector on the grounds of poor accessibility by sustainable transport modes and major adverse effect on the landscape. These issues persist in the context of the emerging Plan and are not addressed by the proposed increase in scale of the Development;
- The Lodge Farm proposal includes the development of a secondary school, redirecting provision away from north Rugby where there is a capacity shortfall;
- The SA identifies the Lodge Farm site as subject to low biodiversity constraints. This fails to recognise the site's proximity to six designated eco sites, Dunchurch Pools and the ecological corridors of the Leam Valley, Rainsbrook and Oxford Canal. Critically the SA fails to consider the impact of the loss of 256ha (633 acres) of unspoilt countryside characterised by vibrant ecology;
- The SA asserts that Lodge Farm has the viability headroom to produce a high-quality scheme, minimising climate change impacts. This ignores the significant transport, utility and drainage challenges of the site which the SA later acknowledges will negatively impact viability, as well as the impact on market values due to the proximity of the adjacent prisons;
- Under communities, health and wellbeing the SA ignores the severance caused by the A45 cutting through the Lodge Farm site. It also ignores the 'urbanising' harm caused to Dunchurch Pools, which provides community access to the countryside;
- Harm to the Borough's tourism industry is not considered, where the adjacent Dunchurch Pools (Marina) is the key inland boating tourism facility for the Borough and nationally important. The Marina relies on its rural location to provide the tranquil, close to nature environment sought by its leisure customers. The 'urbanising' effect of the proposed Lodge Farm Development will cause customers to move away causing significant harm to the Borough's tourism industry;
- The SA's heritage assessment fails to consider assets in the adjacent West Northamptonshire District which would be affected by the Lodge Farm Development. The heritage assets not assessed include the Oxford Canal Conservation Area, Onley medieval village and the Iron Age site at Barby Hill. More generally, nationally significant ridge and furrow is equally not considered;
- The SA suggests that there is a case to be made for supporting higher housing growth scenarios. This is at odds with Rugby's strong track record in over delivery, its significant 6.9 year supply against the 2024-2029 requirement, it's Preferred Option 9% buffer, lack of neighbouring unmet need and that uplifting levels to increase levels of affordable housing, in the case of Rugby, is not supported by the evidence base;
- Transport impacts of the Lodge Farm Development are downplayed, one of the key factors in the site being deleted during the examination of the adopted Local Plan. The reliance on the private car and lack of sustainable alternatives, with buses lacking directness and convenience, remains. Severe congestion at Dunchurch Crossroads (with no opportunity to by pass), A45/M45 junctions operating at or beyond safe capacity and the impact on Strategic Road Network mean that significant negative conclusions should be reached.

Numerous letters of objection to the proposed Lodge Farm Development have been received by Dunchurch Pools from concerned members of the inland boating tourism and canal community, enclosed.

The proposed Lodge Farm Development (Site 73):

- Would urbanise Dunchurch Pools' setting resulting in the loss of customers and threatening the facility's future as a leisure marina. Causing significant harm to the Borough's tourism economy, community access to the countryside and local biodiversity.
- Is demonstrated by Rugby Borough Council's Local Plan Preferred Options and supporting evidence base, the conclusions of which are supported, as unnecessary.
- Is not consistent with national policy and would result in significant adverse impacts.

It is hoped that these representations will be positively received by the Council and used to inform and shape the preparation of the Plan. It is recommended that the Council dismiss Site 73 – Lodge Farm as a reasonable alternative as the plan progresses.

1 INTRODUCTION

1.1 Background

- 1.1.1 Claremont Planning is instructed by J Marine Limited, to prepare representations to the Rugby Borough Local Plan, Regulation 18 Preferred Options Consultation. These representations relate to J Marine's operations at Dunchurch Pools (Marina), located south-east of Dunchurch, on the eastern edge of Rugby Borough administrative area, straddling the boundary with West Northamptonshire District.

1.2 Substance of Representations

- 1.2.1 These representations seek to provide the Council with an overview of the Marina development, demonstrating the importance of this as a tourism destination, but also community facility, and highlighting the relationship between the Marina and Rugby. The Marina already plays a significant role in tourism in Rugby, attracting visitors to the area, with the potential for this to be increased in future, which it is considered could be better supported in the emerging Plan as will be demonstrated.
- 1.2.2 The representations generally support the approach that the Council has taken in preparing the Preferred Options draft. This includes:
- Support for the level of housing requirement and approach to housing delivery, agreeing with the Council's conclusions that there is no justification for increasing housing delivery to address unmet needs from neighbouring authorities or affordable housing needs;
 - Supporting the approach to the landscape in policy, but whilst suggesting modifications to recognise that landscape character extends beyond the Borough's boundaries, and to acknowledge the influence of Dunchurch Pools on the landscape;
 - Suggesting modifications to the Rural Economy policy, to better recognise the role of tourism and the importance of Dunchurch Pools to the economy of the Borough. Ensure that policy supports and does not unduly restrict future expansion and diversification of the Marina;
 - Recognise the role of the Marina as a community facility, supporting the access to the Canal Network and countryside that the development provides;
 - Suggesting modifications in respect of historic environment, including recognising the Canal as a heritage asset and recognising the potential impact of development in the Borough on heritage assets beyond the administrative boundary.
- 1.2.3 The representations will also consider the evidence base that has been published alongside the Plan, in particular the assessment of reasonable alternatives and inclusion of Site 73 – Lodge Farm. This includes consideration of the site being deleted during the examination of the current adopted Local Plan, as well as critiquing the assessment of the site that has been undertaken alongside the preparation of the Preferred Options. Critically, this will demonstrate that the conclusions reached are unjustified, and the Council should dismiss this as a potential alternative site going forward.

1.3 Structure of this Report

- 1.3.1 The next chapter of this report will provide an overview of the Dunchurch Pools site, including its planning history, context, and its relationship with Rugby Borough. This will include the aspirations of J Marine for the Marina going forward, providing the background to this response to the Local Plan.
- 1.3.2 The representations will then go on to respond to the draft Local Plan in detail. This will include support overall for the approach that the Council has taken, including in respect of the Objectives and Key Diagram in Chapter 3; and the Strategy in Chapter 4. Chapters 5, 6, and 7 will then go on to consider thematic policies, including in Chapter 5 – the Environment; Chapter 6 – Economy; Chapter 7 – Wellbeing; and Chapter 8 – Design.
- 1.3.3 Finally, the representations will identify concerns with the Council’s site assessment process, focusing on the Sustainability Appraisal, and specifically the identification of Lodge Farm as a reasonable alternative in the site assessment process.

2 DUNCHURCH POOLS

2.1 Site Context

- 2.1.1 Dunchurch Pools represents a recently constructed inland marina, which opened in 2018. Located on the eastern edge of Rugby Borough, the Marina site straddles the administrative boundary, falling partially within Rugby Borough, and partially within West Northamptonshire District (formerly Daventry authority area). The site location is illustrated in the plan provided at **Appendix 1**, whilst the approved Masterplan is provided at **Appendix 2**, and a photograph of Phase 1 is provided at **Appendix 3**.
- 2.1.2 The site of the Marina formerly was part of the HM Prison Onley estate, however, was acquired by J Marine Ltd in 2010 with the purpose of delivering a new inland marina. The site was chosen by J Marine due to its unique position at the centre of the UK Inland Waterways Network where three canal junctions uniquely link the UK's northern, southern, western and eastern waterway systems.
- 2.1.3 The Marina is set within the rural area of Rugby and West Northamptonshire Districts. The only neighbouring development, located at the northern boundary, is HM Prison Onley, HM Prison Rye Hill and a small area of 93 residential houses, originally for prison staff but now privately owned. The village of Barby is located approximately 2.5km to the east, whilst Dunchurch is 3km to the north-west. The nearest major town is Rugby, approximately 5km to the north.
- 2.1.4 As a leisure (non-residential) marina, Dunchurch Pools offers its customers an escape from their hectic daily lives. It is highly appreciated by UK and international customers, with all berths typically occupied. Its rural location in the open countryside of the Leam and Rainsbrook valleys, with their sparse historic villages and a patchwork of fields and ancient hedgerows, is a key reason why the marina is so popular. Customers find the closeness to nature and the tranquillity gives them a much needed boost to their health and wellbeing.
- 2.1.1 The 633 acre proposed Lodge Farm Development (site – 73) lies immediately adjacent to Dunchurch Pools to the south, west and northwest. The proposed 2680 houses and employment/retail/education/health/sport 'new settlement' development would result in the urbanisation of Dunchurch Pools' setting. The Lodge Farm Development (site – 73) masterplan is provided at **Appendix 4**.

2.2 Planning History

- 2.2.1 The development of Dunchurch Pools, involved the regeneration of an area of rundown and neglected landscape, to provide a high-quality eco-tourism development, set within a parkland and biodiverse landscape. A Planning Application, including EIA was submitted to both Daventry and Rugby Borough authorities, under the references DA/2012/0440 and R12/0960 respectively, with the two applications considered positively and approved by the authorities in December 2013 and March 2014 respectively. The application included for up to 550 non-residential berths, with associated marina services including serviced docks, amenities buildings and boat repair facility, associated car parking and service areas, publicly accessible landscaped areas, provision of a shop, café, restaurant and marina centre, as well as minor works to adopted and unadopted roads.

- 2.2.2 The first phase of the Marina was constructed during 2016-2018, and opened to the public in 2018. When fully constructed, the Marina will form the third largest inland marina in the UK, and it is already recognised as a nationally significant facility for the inland waterways and tourism.

2.3 The Marina

- 2.3.1 Dunchurch Pools was designed by the architect responsible for the Eden Project and the landscape architect responsible for a number of the Wildfowl and Wetland Trust's nature reserves. It is a nationally significant facility:

- Supporting a vibrant inland waterway and tourism
- Providing community access to the countryside
- Making a major contribution to local biodiversity action plans
- Providing significant local employment and economic contribution

- 2.3.2 Located at the centre UK's inland waterways, the marina provides the following facilities to canal boaters:

- 550 secure off line leisure moorings (approx. half of which are currently constructed, the remainder of which will be delivered during phases 2 and 3 to be constructed in the short-term)
- Supply Dock offering diesel, gas, coal, logs, water, sewage & rubbish disposal
- Brokerage for boat sales
- Boatyard maintaining and repairing canal boats
- Parking and washrooms

Without such facilities, boating cannot sustainably exist on the canal system and the vibrant waterway is lost.

- 2.3.3 Located in open countryside, the marina offers the community an access hub providing:

- Public access to the marina's 44 acres of parkland and 4km of paths (when complete)
- Public access to the open countryside via six public footpaths which are accessible from the site
- Public access to the canal and towpath network
- Parking (when complete), refreshments, toilets, rubbish disposal and dog bins to support sustainable public access

- 2.3.4 Dunchurch Pools' 88 acre site has been designed with a particular focus on ecological enhancement:

- A mosaic of woodland, scrub, meadowland, open vegetation, tall herb, ponds, wetland and marginal vegetation is being created
- Linkage to existing habitats and wildlife corridors such as the Oxford Canal, Great Central Railway (disused), Rainsbrook and Leam valleys.
- Enhancement of surrounding open countryside, which includes: Rainsbrook Tributary – Eco Site 22/57, Disused Canal – Eco Site 04/56, Fields at Onley Prison – Eco Site 14/56, Oxford

Canal – Eco Site 04/56, Disused Central Railway – Eco Site 02/57 + 02/56 and Draycote Meadows SSSI

- Support of rare and endangered species such as barn owls, skylarks, linnets, bull finches, reed buntings, starlings, swallows, bats, brown hares, otters, great crested newts and grass snakes all of which currently thrive on the site

2.3.5 Dunchurch Pools has been assessed as a major contributor to the local Biodiversity Action Plans for Warwickshire & Northamptonshire.

2.3.6 The Marina currently employs 17 people with a further three to be employed in 2025. It is anticipated that, when fully complete, Dunchurch Pools will employ upwards of 50 people. In addition, the facility employs numerous local contractor tradesmen and suppliers as it develops and maintains the site. As local residents, these people and their families further spend in the local community.

2.4 Relationship with Rugby Borough

2.4.1 Whilst the Marina site straddles the administrative boundary between Rugby and Daventry, functionally the operation of the Marina relates more to the Borough of Rugby, owing to the geographical proximity to Rugby town, which lies approximately 5km to the north-west, but also the village of Dunchurch, which is approximately 3km to the north-west.

2.4.2 The Marina is a tourism business operation, based on overnight visitors staying on their boats at the Marina as well as supporting the approximately 7,000 further boats passing the site annually. Dunchurch Pools is a destination that draws in visitors to the wider area, and in particular Rugby town, as the nearest larger destination. Visitors are typically from the UK, but also visit from Europe, America, Australia and New Zealand. Local pubs, restaurants, hotels, campsites, shops, leisure attractions, transport all benefit.

2.4.3 Nationally the Inland Boating Tourism Industry provides the economy with £1.54 Billion GVA and supports 80,500 jobs (Canal & River Trust technical report March 2024). 10% of boats on Canal & River Trust waterways are based in Rugby, West Northamptonshire and Stratford on Avon boroughs, the 3 Junctions Area. 45% of boats on Canal & River Trust waterways are based in the East and West Midlands. As a nationally significant inland waterways facility (UK's third largest), Dunchurch Pools strongly enhances Rugby Borough's ability to benefit from the opportunity this vibrant tourism industry offers, see section 6.1.

2.4.4 J Marine, through these representations, wants to demonstrate the strength of support for Dunchurch Pools and the concern of Marina visitors to the inclusion of Site 73 as a reasonable alternative in the Plan. To this end, J Marine has gained numerous signatories to an objection letter, redacted copies of which are provided at **Appendix 3** (original copies can be provided if required).

3 LOCAL PLAN – OBJECTIVES & KEY DIAGRAM

3.1 Objectives

- 3.1.1 J Marine Ltd supports the approach the Council has taken in respect of the Local Plan, and considers that this responds positively to the expectations of national policy. In particular, the high level objectives set out in the Plan are considered appropriate, aspirational but realistic, and will help to shape growth in the Borough in a sustainable way. This approach is considered to be consistent with the objectives of Paragraph 15 of the Framework.
- 3.1.2 Identification of the revival of Rugby town centre as an objective is strongly supported and consistent with national policy, in particular the tests of soundness prescribed in Paragraph 35 of the Framework. These tests identify that Plans are ‘sound’ if they fulfil certain criteria, one of which is consistency with national policy, and specifically enabling the delivery of sustainable development. In the case of Rugby Borough, the urban area of Rugby is evidently the most sustainable location for development, and a strategy that focuses development at Rugby town will help to deliver this objective in relation to the revival of the town of Rugby but also ensure a sustainable approach to development across the Borough.
- 3.1.3 The final objective to support a greener, more diverse borough, is also strongly supported by J Marine. It is recognised that this aligns positively with the direction of national planning policy, but also with the objectives of development at Dunchurch Pools. As will be demonstrated through these representations, it is considered that the emerging Plan can do more to provide policy to support achieving this objective.

3.2 The Key Diagram

- 3.2.1 The diagram illustrates the proposed spatial distribution of development, which is proposed to be dispersed, but with a significant focus on the urban area of Rugby. This is supported, with subsequent representations confirming why the Council has chosen the most appropriate strategy for growth when considering alternatives, as evidenced through the Sustainability Appraisal (SA). The SA establishes that the preferred strategy performs strongly overall, and although it is not necessarily the best when assessed against all topics, it provides a positive balance, minimising environmental impacts whilst securing an appropriate level of housing delivery. It is on this basis that J Marine Ltd would consider the Council is pursuing a justified strategy in accordance with the tests of soundness in paragraph 35 of the Framework, in particular one which is appropriate when taking into account reasonable alternatives.

4 LOCAL PLAN – STRATEGY

4.1 S1 - Settlement Hierarchy & S5 – Countryside Protection

4.1.1 Consistent with the objectives and key diagram, Policy S1 details the settlement hierarchy which directs development to the locations in the Borough which are best served in respect of services and facilities. The policy identifies that Rugby urban area will be the main focus for new homes and employment; with main rural settlements such as Brinklow to accommodate some development; whilst other rural settlements such as Ansty will accommodate only limited development. The supporting text confirms that this policy is to be read alongside Policy S5 – Countryside Protection, which establishes that outside of settlement boundaries, development will only be permitted where it is in accordance with policy that supports development in such locations. The supporting text confirms that this will include types of development such as renewable energy, rural worker dwellings, rural economy and replacement dwellings; whilst development of essential infrastructure and extraction of minerals would also be supported in line with national policy.

4.1.2 The identified settlement hierarchy, and confirmation that development outside of settlements will be restricted save for under select circumstances is strongly supported by J Marine. It is considered that the Local Plan provides an important mechanism to direct future development to the most sustainable locations, whilst also protecting the rural areas of the Borough from potential development that wouldn't align with the proposed strategy. This is particularly important for Dunchurch Pools, where the rural setting that is generally free from other development, save for the Prison at the northern boundary which pre-dates the Marina, is critical for providing the tranquil context and landscape that attracts visitors.

4.2 S2 - Strategy for Homes

4.2.1 Building on the settlement hierarchy and general approach to development set out in Policy S1, Policy S2 goes on to establish the proposed approach to meeting housing need in particular. This confirms how the Council intends to deliver the identified housing requirement of 12,978 new homes, or 618 dwellings per year across the plan period 2024 to 2045. The draft policy confirms the strategy for delivering this level of housing, and critically confirms that the proposed approach will actually deliver 14,134 homes.

4.2.2 The Council's approach to setting the housing strategy is supported as consistent with the expectations of national policy. The Framework establishes that Plans should provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, as set out in Paragraph 35. Similarly, Paragraph 61 of the Framework emphasises the importance of ensuring that a sufficient amount and variety of land can come forward to support the Government's objective of boosting the supply of homes. The Council's approach through Policy S2 aligns with Government expectation, ensuring that the Borough is providing sufficient housing to address the Standard Method local housing need requirement, plus an additional 9% buffer over that minimum requirement, thus ensuring the emerging Local Plan strategic is robust.

4.2.3 The Framework also identifies that in addition to the authority's own housing needs, there may also be a requirement for emerging Plans to meet unmet needs from neighbouring authorities. This is considered in the Sustainability Appraisal, which references the cross-boundary provision

made in the adopted Development Plan to meet unmet needs from Coventry. However, Paragraph 5.2.8 of the SA goes on to identify that the emerging Coventry Local Plan is expected to meet Coventry's housing needs in full, and it is expected that there is little risk of unmet needs from other authorities. The only factor that could support setting a higher housing requirement was considered to be affordable housing, although the SA itself recognised that the question of uplifting housing levels to support delivery of greater levels of affordable housing is complex, and in the case of Rugby is not supported by the evidence base.

- 4.2.4 On this basis, it is considered that the amount of housing envisaged through the Preferred Options draft of the Plan is appropriate, ensuring that the Plan will provide for the Borough's housing needs in full, with some flexibility should sites not deliver as quickly or as many homes as anticipated. It is therefore considered that there is no requirement to proceed further with scenarios that involve greater levels of housing delivery, as this is not justified or necessary in the context of a Local Plan that is already proposing to provide in excess of its minimum housing needs.

4.3 S6 - Residential Allocations

- 4.3.1 The Preferred Options identifies through Policy S6, proposed site allocations to deliver housing, alongside the large Sustainable Urban Extensions specifically referenced in Policy S2. The allocations are focused around Rugby town which, the supporting text explains, including existing commitments will deliver at least 75% of new housing in the emerging Plan period 2024-2045. With the rural areas it goes on to clarify, development will be planned at the main rural settlements, Wolvey, Brinklow and Long Lawford.
- 4.3.2 The proposed approach to site allocations is strongly supported by J Marine, noting that it represents a sustainable approach to distributing development across the Borough, whilst focusing development at the settlements that are most suited for accommodating further development. This approach is considered to be consistent with Paragraph 110 of the Framework, which advises that significant development should be focused on locations which are, or can be made, sustainable. It is evident through the Plan and supporting evidence that there are sufficient opportunities to direct development to sustainable locations, without the need for substantial new developments to be situated in the rural area, such as the Lodge Farm new settlement, assessed as an alternative option in the Sustainability Appraisal. It is contended that the preferred option's Site Allocations identified through Policy S6 are appropriate and justified when considering the evidence base, and therefore represents a sound approach to plan-making, as required by national policy.

5 LOCAL PLAN – ENVIRONMENT

5.1 EN2 – Landscape Protection

- 5.1.1 As identified through earlier sections of these representations, J Marine as an organisation, is strongly supportive of policy recognising the importance of landscape and biodiversity, and the relationship that this should have with new developments. Alongside the preparation of the Plan, the preparation of a Landscape Character Assessment, and the specific assessment of landscape impact and value in respect of large sites is supported. In particular the conclusions regarding the sensitivity of the Feldon Landscape Character Area, the importance of protecting historic character and maintaining and protecting the high levels of tranquillity is strongly supported. It is considered important that this should influence the selection of site allocations, but also the policy wording.
- 5.1.2 It is considered that the Landscape Character Assessment has focused within the Borough boundaries, and not considered that the landscape character extends beyond the administrative boundaries, which should be recognised. In particular, the Dunchurch Pools site, as identified earlier in this report, lies within both Rugby Borough and West Northamptonshire areas, and provides a unique landscape that has evolved over recent years since the Marina's inception. The site lies within the Feldon Landscape Character Area, detailed in the LCA report, however the report does not make reference to the Marina. Similarly, the canal network is only briefly referenced in this report. It is considered that there is an opportunity through this emerging Plan to recognise the importance of the Marina as a tourist destination, but also as a positive influence on the landscape and biodiversity of this part of the Borough. However, in order to do so, the Plan and its evidence base must firstly recognise the Marina, and secondly the influence and beneficial impacts that it has already had on the landscape and will continue to do so as the development is fully constructed and evolves over time. This amendment to the Plan and the corresponding evidence base documents is considered necessary to ensure that the Plan is consistent with the aspirations of Paragraph 187 of the Framework, which advises that planning policies should recognise the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services.
- 5.1.3 The LCA should also specifically recognise that where the Canal flows into West Northamptonshire, beyond the Rugby administrative boundary, it is a Conservation Area, and thus a designated heritage asset. As a result, developments in Rugby Borough could have implications for the setting of this designated heritage asset, where it extends beyond the Borough boundary, which should be recognised and sensitively responded to by new development proposals.
- 5.1.4 On this basis, it is considered that the Policy EN2 should be framed in a way that recognises that landscape character extends beyond the Borough boundary, either through the text of the Policy or the supporting text. It is also considered that the Landscape Sensitivity Assessment of Strategic Site Options and the Landscape Character Assessment reports should be updated to respond to this point and, in particular, the assessment of Site 73 Lodge Farm should be revisited. This should reflect the heritage context of the Canal, but also the sensitivity to change of the Marina, which is lacking in the present assessments. It is considered that this further demonstrates why

the Lodge Farm site should be fully discounted from consideration as a strategic development site option as the emerging Local Plan progresses.

5.2 EN7 – Environmental Protection and Amenity

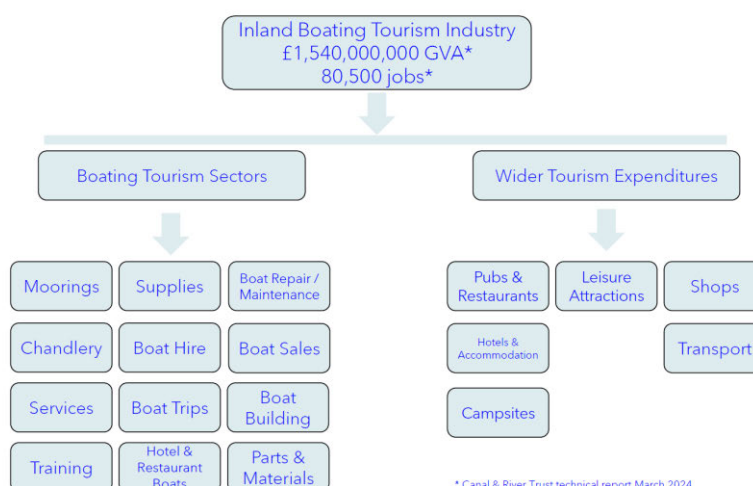
- 5.2.1 J Marine strongly supports the wording of this policy, and the requirement that new development shall not impact the amenity of existing or proposed users or occupants of neighbouring buildings or land. This is important in the context of Dunchurch Pools, insofar as the ongoing operation of the Marina requires that the surrounding landscape character and tranquillity be maintained, and not impacted through development proposals. The Marina represents an important economic and environmental asset for the Borough and wider area, and it is critical that through the emerging Local Plan this be acknowledged and respected, with Policy EN7 able to contribute towards this.

6 LOCAL PLAN – ECONOMY

6.1 Rugby Borough Economic Strategy

6.1.1 Rugby Borough Council has recently published a high-level overview of its emerging Economic Strategy 2025-2035 which will inform the Local Plan. J Marine considers that the inland boating tourism sector offers considerable economic opportunity to the borough, which is uniquely located at the centre of the UK's inland waterways network.

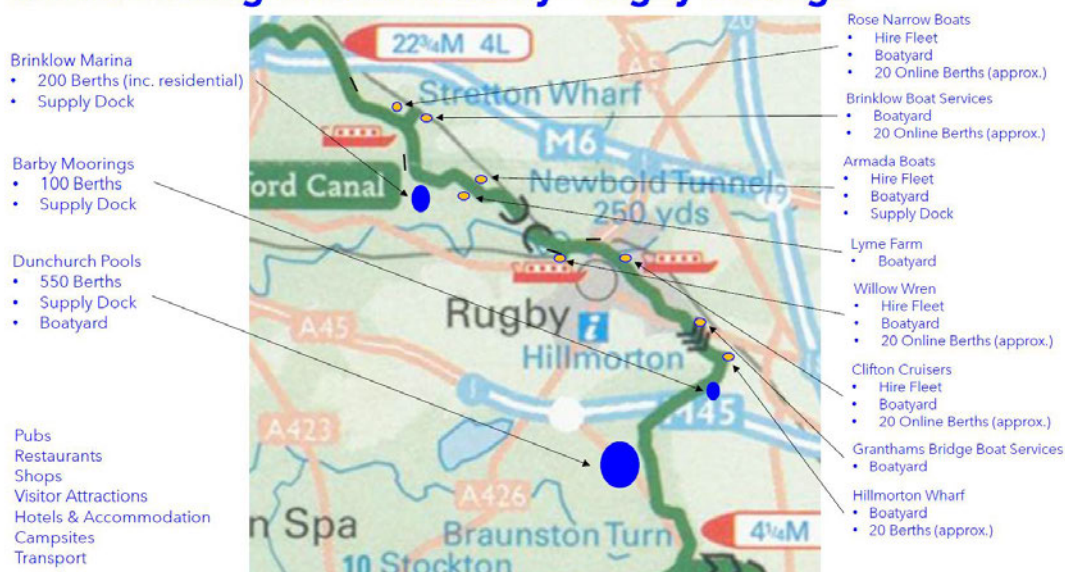
6.1.2 Nationally, the inland boating tourism sector provides £1.54 billion GVA and 80,500 jobs to the UK economy (Canal & River Trust technical report March 2024). The industry supports boating tourism sectors such as marinas, boat yards, boat hire and chandlery as well as wider sectors such as shops, pubs, accommodation and transport where the boating customers use these facilities.



6.1.3 Canal & River Trust managed navigations account for 70% of the UK's navigable inland waterways, including the Oxford Canal which passes through Rugby Borough. Over 10% of boats on Canal & River Trust navigations nationally are moored in the boroughs of Rugby, West Northamptonshire and Stratford on Avon, the '3 Junctions Area'. 45% of boats on Canal & River Trust navigations are moored in the East and West Midlands. Hillmorton Locks, located on the Oxford Canal as it enters Rugby town, have the highest number of boats passing through them of any canal locks in the UK. Rugby Borough's economy is strategically located to significantly benefit from the inland boating tourism sector.

6.1.4 Rugby Borough's inland boating tourism sector (south of the M6) includes 3 large marinas, 9 boatyards, 4 hire fleet centres and helps support numerous shops, pubs, restaurants, visitor attractions and transport companies. The foundation of the industry is the marinas, without who's facilities, boats cannot be supported sustainably on the canal system.

Inland Boating Tourism Industry - Rugby Borough



6.1.5 Approximately 550 boats are currently moored at Rugby Borough's marinas, growing to 850 when Dunchurch Pools Marina completes its remaining phases. Dunchurch Pools Marina accounting for 65% of the 850 boats in the Borough.

6.1.6 Rugby Borough's emerging Economic Strategy recognises the opportunity the inland waterways offer, 'This asset could be a driver for growing the local visitor economy through attracting walkers, boaters, cyclists and tourists looking for an affordable short stay'. J Marine considers that the positive contribution boating tourism offers the Borough is more extensive and offers even greater opportunity.

6.1.7 Dunchurch Pools Marina, along with the Oxford Canal, is the key foundation facility for a vibrant, economically productive waterway within the Borough. It is essential that, though the emerging Local Plan, this is acknowledged and supported.

6.2 Policy E3 – Rural Economy

6.2.1 The inclusion of Policy E3 in the emerging Plan is supported by J Marine, in particular providing support for tourism, visitor accommodation and leisure in rural areas.

6.2.2 In respect of Part A (i) of the policy, J Marine suggest that the policy should not restrict development of tourism, visitor accommodation and leisure-based uses to small scale, where these are associated with existing businesses. Dunchurch Pools, as approved through existing planning permissions, will eventually comprise a substantial development that should be recognised through the emerging Plan. Whilst at present a canal-based facility, the Council should recognise that over time, the requirements of J Marine at Dunchurch Pools will change, and there may be opportunities to diversify and enhance the offering provided. This may include wider tourism and visitor accommodation opportunities on a larger scale, but that remains appropriate for the countryside location. The policy should not unduly restrict potential development at Dunchurch Pools, ensuring that the development can continue to expand and contribute to the Borough's economy. This is consistent with national policy in particular, at Paragraph 88 of the Framework, sets out that planning decisions should enable the sustainable growth and expansion of all types of businesses in rural areas.

- 6.2.3 The support for canal-based facilities in Part A (vi) of the policy is welcomed. However, it should be recognised that such facilities should typically be directed to the most sustainable locations in accordance with national policy, and therefore canal-based facilities should be expected to be located at or adjacent to existing settlements. This should not impede development associated with existing canal-based developments such as Dunchurch Pools, which represents a sustainable location due to the proximity to the existing built development at Onley and the existing approved proposals. Accordingly, it is contended that the Plan should be amended to recognise that new canal-based facilities should typically be located at or adjacent to existing settlements. This is necessary to ensure that the Plan can be found to be consistent with national policy, specifically noting that main town centre uses such as leisure developments should typically be located in a designated centre, unless it can be demonstrated that such sites are not available through a sequential assessment.

7 LOCAL PLAN – WELLBEING

7.1 W1 – Protection of Community Facilities

- 7.1.1 Through Policy W1 of the emerging Local Plan, the Council recognises the importance of community facilities or other services that contribute towards the sustainability of an area. It is considered that the policy and supporting text could additionally include recognition of Dunchurch Pools as a community facility that should be protected by the emerging Plan, supporting proposals for future development that would enhance this community offering. Whilst the Marina sits predominantly within West Northamptonshire, the site straddles the boundary and part of the approved future development will be situated within Rugby Borough. Furthermore, the cross-boundary nature of the development, and the role that it plays in bringing tourists to Rugby should be recognised, as well as the opportunity that the development provides for enabling residents of Rugby Borough access to the Canal network and the wider countryside. This is considered necessary to ensure that the Plan can be found to be consistent with national policy, through which Paragraph 98 of the Framework sets out that the provision and use of community facilities should be positively planned for.

8 LOCAL PLAN - DESIGN

8.1 D4 – Historic Environment

- 8.1.1 Similarly to the concerns regarding landscape that have been raised in earlier sections of these representations, J Marine is concerned that Policy D4 only considers the borough's heritage assets. This fails to recognise that impacts of development in Rugby Borough will extend across the Borough's boundaries, meaning that development in the Borough could impact on the setting of heritage assets that fall outside of, but adjacent to the boundary. In particular, attention is drawn to the Oxford Canal, and in particular the sections of the Canal that extend into the adjacent District of West Northamptonshire (formerly Daventry District). The Canal in West Northamptonshire is a designated heritage asset, designated as a Conservation Area. Accordingly, Policy D4 should recognise the implications of development proposals could have on heritage assets that extend beyond the administrative boundary of Rugby Borough to ensure that the value of these assets as an irreplaceable resource is sufficiently recognised by Policy, in a manner that is consistent with Paragraph 202 of the Framework. It is contended that through the Local Plan process, or alongside this, the Council could recognise the Canal in the Borough as a designated heritage asset, which would be consistent with the approach taken in the neighbouring authority area.
- 8.1.2 Further to this, it is considered that the site selection and allocation process for the emerging Rugby Local Plan, should be informed by robust assessments, which extend beyond the administrative boundaries. At present, it is considered that the site assessment process, in particular the consideration of reasonable alternatives in the Sustainability Appraisal, fails to recognise the presence of the Conservation Area beyond the boundary in the context of Site 73 – Lodge Farm. This will be explored further in the next section of these representations.

9 LODGE FARM PROPOSAL

9.1 Introduction

9.1.1 As introduced earlier in these representations, whilst J Marine generally supports the approach to plan-making the Council has taken, the inclusion of Site 73 – Lodge Farm as a reasonable alternative in the Sustainability Appraisal and other Site Assessments is objected to. This view is shared by many of the visitors to the Marina, and copies of an objection letter have been provided in **Appendix 3** to confirm the strength of concerns raised by the community.

9.1.2 To emphasise the scale of Lodge Farm, and the impact that this would have on Dunchurch Marina, **Appendix 4** provides an Illustrative Masterplan of Site 73 as promoted, and confirms how this would dominate the local area around the Marina, fundamentally changing the character of the area. This chapter of the representations will explain the rationale for this objection, and why Site 73 – Lodge Farm should not be considered as a reasonable alternative as the Plan progresses.

9.2 Rugby Local Plan 2011-2031

9.2.1 It is important to remind the Council of the previous proposed allocation at Lodge Farm, which featured as a proposed site allocation in the submission version of the now adopted Rugby Local Plan 2011-2031. The submission version of the Plan through Policy DS10 envisaged that the site at Lodge Farm would accommodate around 1,500 dwellings, with a range of supporting services and community facilities, creating a new Main Rural Settlement in the Borough.

9.2.2 The allocation was however deleted during the course of the examination process, specifically through MM31-32, MM37-39, MM59-65, MM140, MM145 and MM160, which the Inspector deemed were all necessary in order to make the Plan sound, deleting Policy DS10, the supporting text, and amending the relevant parts of the housing trajectory.

9.2.3 The Inspector's rationale for deletion of Lodge Farm through that Plan were clearly set out through the Inspector's Report (March 2019), specifically paragraphs 127-156. The issues raised included:

- Poor accessibility, particularly by non-car modes; 'it is not a location where the need to travel would be minimised, or where the use of sustainable transport modes can be maximised'. No evidence had been provided that the location could be made sustainable in transport terms.
- Landscape is sensitive to change, an area that has retained much of its traditional character and has undergone limited change or development over the years. Despite mitigation measures, major development would remain conspicuous, and the 'urbanising effect' and 'prominence and visibility of the site within the valley' would 'cause long-term damage to essential character and fabric of the landscape'.
- Less than substantial harm to designated heritage assets.
- Critically, that there was no need for the allocation to meet the Plan's housing requirements.

- 9.2.4 It is evident that for the most part, these issues persist in the context of the emerging Plan, and it is not considered that proposing to increase the scale of the potential development that could be accommodated at Lodge Farm would address those issues.

9.3 Sustainability Appraisal Assessment

- 9.3.1 The assessment of Lodge Farm (Site 73) in the Sustainability Appraisal is identified in the context that it was the only site being actively promoted that could accommodate a new settlement, with the SA recognising that it was not necessary to explore new settlement options over those that have been promoted to the Council. The SA considers two growth options including a new settlement: Scenario 3 – PO minus selected sites plus Lodge Farm (14,054 homes); and Scenario 5 – PO plus Lodge Farm (15,934 homes).

- 9.3.2 One of the issues identified by the SA is secondary school capacity, and the concern that if Lodge Farm came forward a secondary school would be provided as part of that development, instead of another school being delivered in the north of Rugby where it would better address existing shortfalls in capacity. It is assumed that there would not be sufficient funding to deliver both a new school at Lodge Farm and elsewhere. Accordingly, the options including Lodge Farm score poorly with regards to accessibility, but also are identified as negatively impacting the provision of infrastructure where it is needed, which is not considered fully through the assessment.

- 9.3.3 The SA identifies that Lodge Farm (and NW Rugby sites) are both subject to notably low biodiversity constraints. J Marine objects to these conclusions, and considers that the assessment has failed to recognise fully the ecological context of the Lodge Farm site in particular. This includes the site's proximity to designated eco sites including:

- Rainsbrook Tributary – Eco Site 22/57
- Disused Canal – Eco Site 04/56
- Fields at Onley Prison – Eco Site 14/56
- Oxford Canal – Eco Site 04/56
- Disused Central Railway – Eco Site 02/57 + 02/56
- Draycote Meadows SSSI

It further fails to recognise the site's location adjacent to Dunchurch Pools, the marina including habitats recognised as a major contribution to local biodiversity action plans. The proposed Lodge Farm development masterplan appears to designate Dunchurch Pools' habitats as public park for the new settlement.

- 9.3.4 The Lodge Farm site is located within known wildlife corridors and hunting routes including the Leam Valley Corridor, Rainsbrook Corridor and Oxford Canal corridor. The Leam Valley is part of a strategic ecological corridor linking the Dunsmore and Feldon landscape area to the west, and the Northamptonshire Uplands and Leicestershire Vales to the east. Development of the scale envisaged at Lodge Farm would interrupt wildlife migration routes, isolating populations and reducing the long-term resilience of Warwickshire and Northamptonshire's ecosystems. Critically the SA fails to consider the impact of the loss of 256ha of unspoilt open countryside which is characterised by vibrant ecology, assessing the site instead as of limited biodiversity value. This assessment is objected to, as failing to value the site correctly.

- 9.3.5 With regards to climate change, the assessment focuses on emissions from the built environment, ignoring the transport emissions which are instead considered under the transport section. This

downplays the implications of site location and the need for travel in this regard. However, the other conclusions reached in this section are also considered inappropriate. In particular, in paragraph 6.2.23 it is suggested that Lodge Farm has the potential to viably deliver a high quality scheme when compared to NW Rugby, due to the need to deliver significant transport upgrades at NW Rugby. This fails to acknowledge the significant infrastructure challenges likely at Lodge Farm, given the rural nature and context of the site at present, which it is anticipated would likewise require significant transport upgrades, along with many others such as utilities and drainage, and similarly impact the viability headroom for any development. The assessment's conclusions here run counter to later considerations on infrastructure in 6.2.35 of the report, which suggests that the need for significant infrastructure would impact viability at the Lodge Farm site. In paragraph 6.2.23 the assessment also suggests Lodge Farm to be a relatively more attractive location for home buyers than NW Rugby. The impact of the two prisons, however, immediately adjacent in West Northamptonshire District, has not been assessed and is considered to compromise the claim of relative attractiveness. It is considered that policy could, and should, drive all development in the emerging Plan to meet higher standards in terms of climate change, in order to align with national policy and guidance. In regards to climate change adaptation, the assessment suggests that due to the scale of development envisaged, there would be excellent potential to masterplan with flood risk in mind. However, this will come at a cost, impacting the potential capacity of development, and will need to ensure that this does not result in downstream impacts.

9.3.6 The conclusions reached in respect of Lodge Farm under the communities, health and wellbeing section are misguided, and don't reflect the assessment's own considerations. In particular, the suggestion that NW Rugby and Lodge Farm both present an opportunity in terms of directing growth with a view to aligning with community, health and wellbeing objectives conflicts with the earlier concerns outlined in terms of the severance caused by the A45 cutting through the site, and the range of infrastructure and wider costs that would have implications for viability. Rather than focusing on the impact on existing communities, it is considered that this section should also consider the potential for new communities to lack good access to key services and facilities, either through lack of provision or through existing physical barriers such as the A45. The assessment also fails to consider the impact of Lodge Farm on existing developments nearby, including in particular Dunchurch Pools. This would be adversely impacted by the urbanising effects of development at Lodge Farm, reducing the benefits that can be provided by the Marina for both visitors and existing residents of Rugby.

9.3.7 With regards to employment, the SA has not fully considered the implications of the location of Lodge Farm with regards to access to employment. The assessment suggests that the site is 'well-linked to a major centre of employment', however at present those links are reliant on access by the private car. No consideration is made in this section of the impact that the development would have on existing tourism employment, in particular inland boating tourism in Rugby, a borough which enjoys a strong share of the £1.54 billion GVA / 80,500 job national industry (Canal & River Trust technical report March 2024). The canal and the borough's three marina's (Dunchurch Pools, Barby Moorings and Brinklow Marina) are the foundation of this industry providing the 'footfall/customers' to local pubs, restaurants, shops, hotels, campsites, leisure attractions, boatyards, boat supplies and boat services companies. Dunchurch Pools Marina, which provides 45% (when complete 65%) of the borough's leisure moorings, would be negatively impacted by the Lodge Farm development. The consequent movement of leisure customers away from the borough harming tourism in Rugby, which contributes significantly to the local economy.

- 9.3.8 The SA considers heritage constraints, however, does not fully consider the historic context of the Lodge Farm site in J Marine's view. In particular, the assessment fails to acknowledge the proximity of the Oxford Canal Conservation Area, which whilst over the administrative boundary in West Northamptonshire District, the setting of this designated heritage asset extends into Rugby Borough and critically across the Lodge Farm site. The Conservation Area Appraisal describes the setting of this asset as 'open countryside with few other intrusions', which would clearly be significantly impacted by a new settlement. Similarly, the West Northamptonshire Summary of Special Interest specifically identifies the importance of the rural setting of the canal, which also recognises the canal as a major feature of the rural landscape. The assessment also lacks consideration of the impact that development would have on the ridge and furrow, which previously has been identified to be of national importance by Historic England, when assessing the impact of previous development proposals at Willoughby. The advice from Historic England went on to advise that the protection of such areas should be managed through the planning process. Other heritage features such as the Onley medieval village, Iron Age site at Barby Hill, as well as the historic town of Dunchurch would similarly be impacted, which is not considered in the SA, the conclusions of which should be revisited in this regard.
- 9.3.9 The need for housing is considered in the SA, which suggests that there is a case to be made for supporting one of the two higher growth scenarios. Whilst this may be the case, it should be recognised that in respect of housing delivery, Rugby Borough has performed consistently well against the annual requirement, resulting in a significant over-delivery against the Local Plan Annual Requirement, as set out in the Council's Housing Land Supply Position Statement 2024-2029. Whilst during 2011/12-2016/17, delivery was less than required, this improved significantly in more recent years, with cumulative delivery exceeding the requirement by c.1,200 dwellings. Similarly, the Statement confirmed that the Council is able to demonstrate a significant supply of 6.9 years against the annual requirement for 2024-2029. The conclusions set out in section 5.2 of the SA do not appear to convincingly justify increasing the housing requirement over and above the Standard Method figure. It establishes that there is little risk of unmet housing needs from elsewhere needing to be accommodated; whilst growth aspirations are unlikely to be a significant consideration in this regard. The only factor that could supporting setting a higher housing requirement was considered to be affordable housing, although the SA itself recognised that the question of uplifting housing levels to support delivery of greater levels of affordable housing is complex, and in the case of Rugby is not supported by the evidence base. It is therefore demonstrable that there is not a reasonable case to support the higher levels of housing envisaged by some of the growth scenarios, and the Preferred Option represents a positive approach to delivering an adequate level of housing in the emerging Plan.
- 9.3.10 The assessment acknowledges the sensitive landscape at Lodge Farm. However, it is considered that the assessment downplays concerns about the wider impacts of development on the surrounding landscape and existing uses, in particular the canal and the Marina. The Council is again referred to the conclusions of the previous Local Plan Inspector in this regard, which concluded that a smaller scale of development at Lodge farm would have a 'major adverse effect' on the landscape (Paragraph 143 of the Inspector's report), noting that these would not be capable of mitigation due to the valley's openness. These conclusions persist, are clearly amplified by the proposed significant increase in the scale of the Lodge Farm development, and should be recognised in the SA.

9.3.11 Transport impacts of the Lodge Farm site are considered by J Marine to be similarly downplayed, without fully recognising the challenges that would be experienced with seeking to ensure a sustainable development is delivered on that site. This issue was one of the key factors which resulted in the site allocation being deleted during the examination of the adopted Local Plan, due to the reliance on the private car and the lack of alternative sustainable transport modes, with buses considered to lack the directness and convenience that would be offered by the car. The SA briefly identifies concerns regarding congestion at the Dunchurch A426/B4429 crossroads, which was assessed in the Transport Network Analysis by SLR Consulting published in February 2025 as operating at just 40% of free flow conditions, with no opportunity for a bypass to be provided due to heritage constraints. Similarly, the surrounding network including the junction of the A45 and M45 are both operating at or beyond safe capacity. It is contended that in both scenarios where Lodge Farm is included, significant negative conclusions should be reached in respect of transport impacts, whereby there is no opportunity to address these fully and development would inevitably result in significant increases in traffic and congestion.

9.3.12 On this basis, it is considered that the conclusions reached in respect of Scenario 3 and 5 of the SA should be revisited, recognising the significant adverse impacts that would likely arise should Lodge Farm be pursued as a site allocation in the emerging Local Plan.

9.4 Stage 2 Site Assessment Conclusions

9.4.1 The evidence base published alongside the Preferred Options draft also included a Stage 2 Site Assessment, which included an assessment of Site 73 – Lodge Farm as a potential site option, despite the assessment acknowledging significant constraints.

9.4.2 In particular, the assessment highlights concerns with accessibility, high levels of congestion on the surrounding road network and concerns about the impact on the Strategic Road Network flagged by National Highways. The assessment suggests that as a large scale proposal, this site has potential to improve public transport accessibility, however, the conclusion of the previous Local Plan Inspector should be referenced in this regard, in particular Paragraph 131-134 of the Inspector's report. In that report, it was identified that the frequency and routing of such services would be unlikely to be attractive, when compared to the convenience and directness of the private car. The inspector concluded at Paragraph 138 that 'It is not a location where either the need to travel would be minimised or the use of sustainable transport modes can be maximised'.

9.4.3 Landscape sensitivity is also identified as medium in the assessment, which is considered downplays its significance and sensitivity, given that the assessment also identifies that the site is characterised by a rural landscape with extensive open farmland, ancient hedgerows and sparse historic settlement patterns. To the south and west, broad expansive views are possible, whilst there is a strong sense of remoteness. As with accessibility, the Inspector similarly raised concerns about the impact on the landscape in the context of the previous Local Plan, 'the proposed allocation would lead to significant harm to the intrinsic character and beauty of the countryside in this part of the borough' paragraph 148 and at paragraph 147 setting out why this was not capable of mitigation. It is considered that this remains a concern which would be increased through the increased scale of the proposed development and the level of development being promoted by the developer, through this emerging Local Plan.

9.5 Commentary

- 9.5.1 Through this chapter of the representations, the analysis has sought to demonstrate the challenges associated with Site 73 - Lodge Farm and why the site does not represent a reasonable alternative option in terms of the emerging Plan development strategy. Despite the conclusions that were reached in respect of the adopted Local Plan, the site continues to be promoted, and the scale and capacity proposed has been substantially increased, and on this basis the Council has continued to assess the site as an opportunity to deliver a 'new settlement' as part of the emerging Local Plan. Whilst it is comforting to J Marine that the site has not been included as a proposed allocation, the continued assessment of the site through the plan preparation process, and the failure to fully assess the implications of the development remains a concern.
- 9.5.2 To J Marine, the most concerning aspect of the proposed development at Lodge Farm relates to the inevitable impact that development would have on the wider landscape through the significant urbanisation associated with such a large scale of development. At present, the site comprises a rural landscape, which provides ecological benefits and a positive setting for heritage assets and features as noted in this chapter. The tranquillity of this landscape is part of the reason why J Marine sought to develop Dunchurch Pools nearby, with the setting critical in attracting the visitors needed to maintain the business and associated jobs, but also the contributions towards Rugby's economy through tourism.
- 9.5.3 On a similar vein, it is contended that the Council's assessment of Site 73 – Lodge Farm has failed to recognise how the development would depend significantly on the private car, lacking sustainable alternative transport modes. The location of the site, its remoteness from other settlements, means that residents would have to travel to employment, services and facilities, as the new settlement is unlikely to cater for the majority of those needs within the development. The suggestion that a larger scale of development would be better able to provide a bus service is questioned, and it is unclear how this would provide an adequate service to the range of destinations that residents would likely need to travel to. This was considered by the previous Local Plan Inspector, who concluded that it would unlikely be popular, when compared to the convenience and directness of the private car. This would mean that significant levels of traffic would be generated by the development, adding to existing congestion and traffic issues in the surrounding area, impacting on local residents and businesses.
- 9.5.4 Notwithstanding the points raised above, fundamentally J Marine considers that the deliverability of Lodge Farm will be challenging, whilst the delivery of homes versus infrastructure, services and facilities are unlikely to be delivered at the same pace. This will mean that in the short term, early residents of the development would be left without schools, shops or medical care; and lacking access to public transport. There is concern regarding the impact that delivery would have on the A45, impeding this for existing residents and businesses whilst necessary transport improvements are undertaken, affecting the functioning and operation of the Prisons and Dunchurch Pools.
- 9.5.5 The argument for the inclusion of Lodge Farm as part of the previous Local Plan, and where it scores most favourably in this assessment is regarding the boosting of the number of homes to be delivered. As evidenced through this report, this is unnecessary in the context of Rugby, which has performed strongly in this regard maintaining robust levels of housing supply and consistently exceeding the housing requirement in terms of delivery. It is maintained that there are more

appropriate options proposed in the draft Plan that would deliver adequate levels of housing, with a suitable contingency also identified.

- 9.5.6 It is therefore recommended through these representations that the Council dismiss Site 73 – Lodge Farm as a reasonable alternative as the plan progresses, focusing instead on assessing sites and options that are consistent with national policy and would not result in significant adverse impacts.

10 SUMMARY & CONCLUSIONS

10.1 Summary

- 10.1.1 These representations have been prepared on behalf of J Marine Ltd, to respond to the current consultation on the emerging Rugby Local Plan, Regulation 18 Preferred Options consultation. These representations relate to J Marine's operations at Dunchurch Pools (Marina), located south-east of Dunchurch, on the eastern edge of Rugby Borough administrative area, straddling the boundary with West Northamptonshire District.
- 10.1.2 The representations have provided an overview of the Marina development, demonstrating the importance of the Marina (along with the Oxford Canal) as the Borough's key inland boating tourism facility. The sector nationally £1.54billion GVA / 80,500 jobs and locally supporting numerous local shops, pubs, restaurants, visitor attractions, transport companies and boatyards in the Borough's economy. Dunchurch Pools' role providing sustainable community access to the countryside and as a major benefit to Local Biodiversity Action Plans is also highlighted. The rural and tranquil setting of the Marina being key to its success with customers seeking leisure time away from their hectic daily lives.
- 10.1.3 The 633 acre proposed Lodge Farm Development (Site – 73) lies immediately adjacent to Dunchurch Pools to the south, west and northwest. The proposed 2680 houses and employment/retail/education/health/sport 'new settlement' development would result in the urbanisation of Dunchurch Pools' setting.
- 10.1.4 In respect of the emerging Plan, the representations confirm that generally J Marine supports the approach that the Council has taken in regards to the Preferred Options draft. The strategy and approach to housing in particular are strongly supported and considered to align positively with national policy and guidance.
- 10.1.5 J Marine has highlighted a number of areas where it is considered the Plan could be enhanced prior to progressing. These includes:
- Landscape – Policy EN2 should be modified to recognise that landscape character extends across administrative boundaries, and to acknowledge the influence of Dunchurch Pools on the landscape;
 - Rural Economy – the Plan should recognise the role that tourism and in particular Dunchurch Pools plays towards the economy of the Borough. Future expansion and diversification of the Marina should be supported, and not unduly restricted by policy.
 - Wellbeing & Community Facilities – Dunchurch Pools should be recognised as a community facility, providing access to the Canal network and wider countryside, which should be supported.
 - Historic Environment – the policies fail to recognise heritage assets beyond the boundaries of Rugby Borough, including specifically the Oxford Canal, which is a designated Conservation Area. It is also suggested that the Council should recognise the Canal within the Borough as a designated heritage asset, consistent with neighbouring authorities.
- 10.1.6 The representations accordingly include suggestions as to where the Council could revisit proposed policies and strengthen the policies and supporting text to support the inland boating tourism sector and the ongoing operation and future expansion of the Marina, in recognition of

the role the business plays in terms of the local economy and providing a key foundation to this tourism sector in the Borough.

10.1.7 Finally, the representations have critiqued the consideration of Site 73 – Lodge Farm through the site assessment process:

- Allocation of Lodge Farm in the now adopted Rugby Local Plan 2011-2031 was rejected by the inspector on the grounds of poor accessibility by sustainable transport modes and major adverse effect on the landscape. These issues persist in the context of the emerging Plan and are not addressed by the proposed increase in scale of the Development;
- The Lodge Farm proposal includes the development of a secondary school, redirecting provision away from north Rugby where there is a capacity shortfall;
- The SA identifies the Lodge Farm site as subject to low biodiversity constraints. This fails to recognise the site's proximity to six designated eco sites, Dunchurch Pools and the ecological corridors of the Leam Valley, Rainsbrook and Oxford Canal. Critically the SA fails to consider the impact of the loss of 256ha (633 acres) of unspoilt countryside characterised by vibrant ecology;
- The SA asserts that Lodge Farm has the viability headroom to produce a high-quality scheme, minimising climate change impacts. This ignores the significant transport, utility and drainage challenges of the site which the SA later acknowledges will negatively impact viability as well as the impact on market values due to the proximity of the adjacent prisons;
- Under communities, health and wellbeing the SA ignores the severance caused by the A45 cutting through the Lodge Farm site. It also ignores the 'urbanising' harm caused to Dunchurch Pools, which provides community access to the countryside;
- Harm to the Borough's tourism industry is not considered, where the adjacent Dunchurch Pools (Marina) is the key inland boating tourism facility for the Borough and nationally important. The Marina relies on its rural location to provide the tranquil, close to nature environment sought by its leisure customers. The 'urbanising' effect of the proposed Lodge Farm Development will cause customers to move away causing significant harm to the Borough's tourism industry;
- The SA's heritage assessment fails to consider assets in the adjacent West Northamptonshire District which would be affected by the Lodge Farm Development. The heritage assets not assessed include the Oxford Canal Conservation Area, Onley medieval village and the Iron Age site at Barby Hill. More generally, nationally significant ridge and furrow is equally not considered;
- The SA suggests that there is a case to be made for supporting higher housing growth scenarios. This is at odds with Rugby's strong track record in over delivery, its significant 6.9 year supply against the 2024-2029 requirement, its Preferred Option 9% buffer, lack of neighbouring unmet need and that uplifting levels to increase levels of affordable housing, in the case of Rugby, is not supported by the evidence base;
- Transport impacts of the Lodge Farm Development are downplayed, one of the key factors in the site being deleted during the examination of the adopted Local Plan. The reliance on the private car and lack of sustainable alternatives, with buses lacking directness and convenience, remains. Severe congestion at Dunchurch Crossroads (with no opportunity to by pass), A45/M45 junctions operating at or beyond safe capacity and

the impact on Strategic Road Network mean that significant negative conclusions should be reached.

10.1.8 It is concluded that the Council should revisit the assessment of Site 73, specifically the conclusions reached in respect of landscape, accessibility, infrastructure, biodiversity, climate change, communities, employment, heritage and transport. Critically, it is demonstrated that the site should no longer be included as a reasonable alternative as the Plan progresses.

10.1.9 Numerous letters of objection to the proposed Lodge Farm Development have been received by Dunchurch Pools from concerned members of the inland boating tourism and canal community, enclosed at **Appendix 5**.

10.2 Conclusions

10.2.1 It is concluded that the proposed Lodge Farm Development (Site 73):

- Would urbanise Dunchurch Pools' setting resulting in the loss of customers and threatening the facility's future as a leisure marina. Causing significant harm to the Borough's tourism economy, community access to the countryside and local biodiversity.
- Is demonstrated by Rugby Borough Council's Local Plan Preferred Options, and supporting evidence base, the conclusions of which are supported, as unnecessary.
- Is not consistent with national policy and would result in significant adverse impacts.

10.2.2 It is hoped that these representations will be positively received by the Council and used to inform and shape the preparation of the Plan. It is recommended that the Council dismiss Site 73 – Lodge Farm as a reasonable alternative as the plan progresses.

APPENDIX 1 – SITE LOCATION PLAN



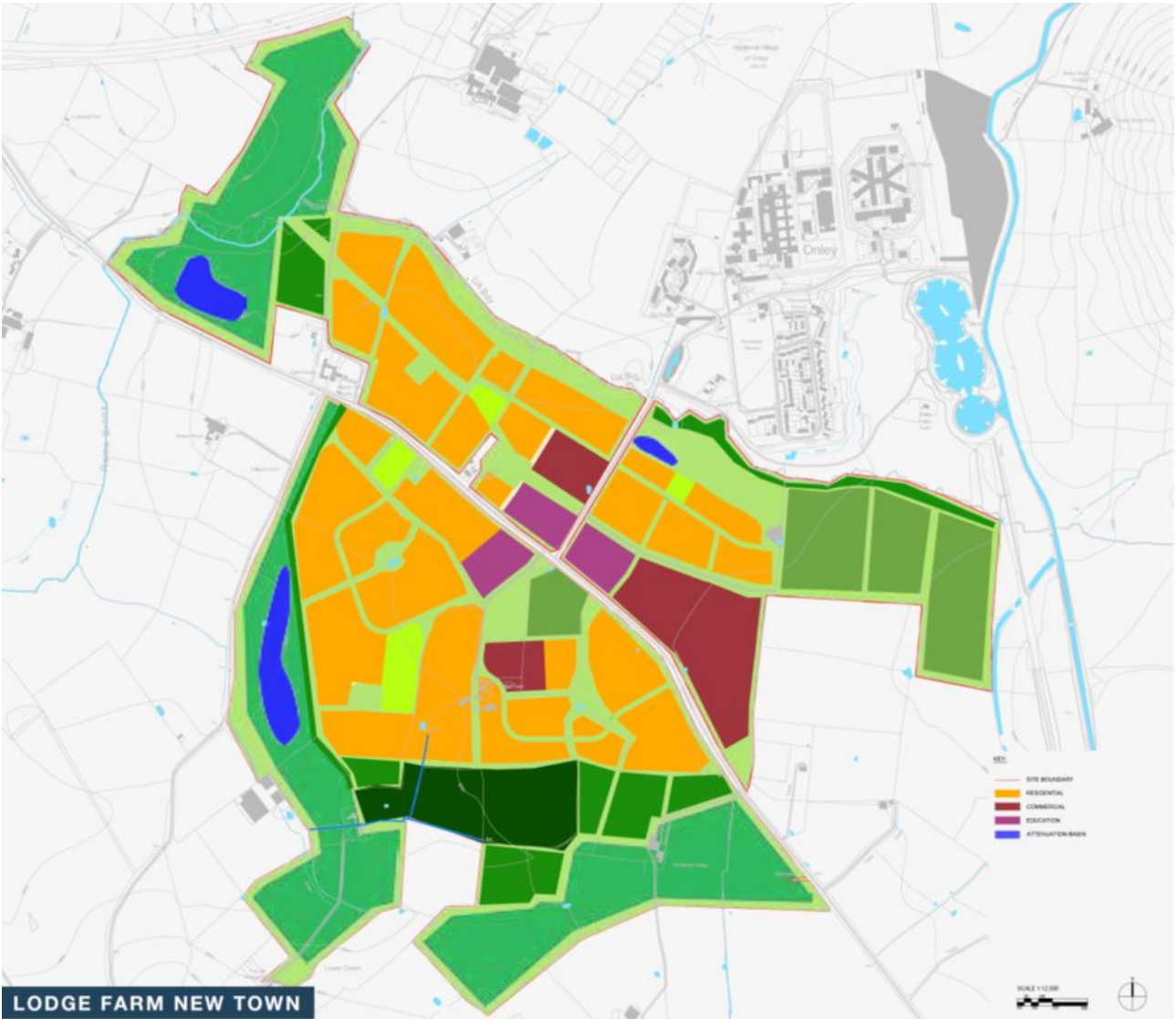
APPENDIX 2 – APPROVED MASTERPLAN



APPENDIX 3 – PHOTOGRAPH OF DUNCHURCH POOLS (PHASE I)



APPENDIX 4 – SITE 73 MASTERPLAN



APPENDIX 5 – OBJECTION LETTERS

Dunchurch Pools Employees – 18 Objection Letters

Dunchurch Pools Moorers – 45 Objection Letters

Local Canal Users – 89 Objection Letters

Canal User Objection Letter – Lodge Farm Development (Site 73)

To: Rugby Borough Council – Local Plan Consultation Team

Subject: Formal Objection to Site 73 (Lodge Farm) – Harm to Inland Waterways, Health & Wellbeing, Ecology & Heritage and Local Economy Grounds

Dear Planning Officer,

I am writing to formally object to the proposed inclusion of Site 73 (Lodge Farm) in the preparation of the Rugby Local Plan. My objection focuses on the impact that this development would have on Dunchurch Pools Marina and the harm it would cause to this nationally significant facility. I highlight the consequential harm the Lodge Farm development would cause to the inland waterways, community health & wellbeing, ecology & heritage, local employment and the local economy.

Dunchurch Pools Marina was designed by the architect responsible for the Eden Project and the landscape architect responsible for a number of the Wildfowl & Wetland Trust's nature reserves. It is a nationally significant facility:

- Supporting a vibrant inland waterway
- Providing community access to the countryside
- Making a major contribution to county biodiversity action plans
- Providing significant local employment and economic contribution

Rugby Borough Council, at planning committee, fully endorsed and supported these project objectives.

1. Harm to Inland Waterways

Located at the centre of the UK's inland waterways, Dunchurch Pools provides the following facilities to canal boaters:

- 550 secure off line leisure moorings (approx. half currently constructed)
- Supply Dock offering diesel, gas, coal, logs, water, sewage and rubbish disposal
- Brokerage (boat sales)
- Boatyard maintaining and repairing canal boats
- Parking & washrooms

The consented marina is on track to be the third largest on the UK's inland waterways and is of national significance. It offers essential facilities, without which canal boating is not possible.

Dunchurch Pools' boating customers use the marina for leisure. The site's location is in open countryside, close to nature and extremely tranquil, key reasons why it is so well appreciated, with all berths occupied. Customers choose the marina because of its rural location.

The proposed 633 acre Lodge Farm development, with 2680 houses and employment/retail/education/health/sports build out, is located immediately adjacent to Dunchurch Pools. This urbanisation, with 8,000 residents anticipated and up to 25,000 new car journeys a day, would remove key reasons why leisure boaters appreciate the marina. The seven to ten year construction period would not be tolerated by moorers. The proposed Lodge Farm development would cause Dunchurch Pools to significantly lose its customers.

Marina businesses are extremely sensitive to berth occupancy. The supply dock and boatyard are financially loss making and cross subsidised by berth revenue. The loss of customers due to the proposed Lodge Farm development would make Dunchurch Pools, as a leisure marina, unviable. The inland waterways would lose a nationally significant facility.

2. Harm to Community Health and Wellbeing

Dunchurch Pools works as an access hub to the countryside. It offers the community:

- Open countryside location
- Public access to the marina's 44 acres of parkland and 4km of paths (when complete)
- Public access to the open countryside via six public footpaths which are joined by the site
- Public access to the canal
- Parking (when complete), refreshments, toilets, rubbish disposal and dog bins to support sustainable public access

The Princess of Wales recently stated, 'Nature and the outdoors has been a key part of my recovery from cancer and of my wellbeing'. The COVID 19 experience has underlined the importance of nature and the outdoors to our wellbeing. By providing extensive public access to the countryside, Dunchurch Pools contributes significantly to the community's health & wellbeing.

The proposed 633 acre Lodge Farm development would place Dunchurch Pools in an urban setting rather than in open countryside. The proposed masterplan re sets the marina's parkland as a park for the new town, which extreme high usage Dunchurch Pools would not be able to financially support. Dunchurch Pools would no longer act as a community access hub to the countryside.

3. Harm to Ecology and Heritage

The Dunchurch Pools 88 acre site has been designed with a particular focus on ecological enhancement. A mosaic of woodland, scrub, meadowland, open vegetation, tall herb, ponds, wetland and marginal vegetation is being created. The site links into existing habitats and wildlife corridors such as the Oxford Canal, Great Central Railway (disused), Rainsbrook and Leam valleys. The surrounding open countryside, which includes: Rainsbrook Tributary – Eco Site 22/57, Disused Canal – Eco Site 04/56, Fields at Onley Prison – Eco Site 14/56, Oxford Canal – Eco Site 04/56, Disused Central Railway – Eco Site 02/57 + 02/56 and Draycote Meadows SSSI, is significantly enhanced. Rare and endangered species such as barn owls, skylarks, linnets, bull finches, reed buntings, starlings, swallows, bats, brown hares, otters, great crested newts and grass snakes all currently thrive on the site. Dunchurch Pools has been assessed as a major benefit to the local Biodiversity Action Plans.

The proposed 633 acre Lodge Farm development, with 2680 houses, anticipated 8,000 new residents, pets (including cats) and up to 25,000 new car journeys a day would adversely affect the local ecology. The adverse effect of the seven to ten year construction period would be significant. The major biodiversity benefits of Dunchurch Pools would be negated.

Dunchurch Pools is located on the Oxford Canal which is a heritage Conservation Area. The Conservation Area assessment states, *'The land use policies for the canal seek to allow for the expansion of all canal uses including transport, whilst seeking to conserve the character of the canal Conservation Area, which is the main factor in generating those uses'*. It describes the area as *'open countryside with few other intrusions'*. Clearly the proposed Lodge Farm development would fundamentally change the character of the Conservation Area, a severe adverse impact.

4. Harm to Tourism and the Local Economy

Rugby Borough and its surrounding districts are uniquely located at the centre of the UK's 7,000 km inland waterways network. The three local canal junctions: Napton, Braunston & Norton, link the UK's northern, southern, eastern and western canal systems. The inland waterways are a significant component of Rugby Borough's tourism offering and represent a major opportunity.

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I urge Rugby Borough Council to remove Site 73 (Lodge Farm) from further consideration in the emerging Local Plan.

Sincerely,

Full Name:

STUART OLIVER NIXON

Dunchurch
Pools
Narrow
Boat
Engineer

E

Date:

13/5/25

4. Harm to Tourism and the Local Economy

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Sincerely



Signature

Full Name (print): Jacob Thomas Smith

Full Address:

Email (optional):

Date: 16/5/20

Association with Canal:

work at Dunchurch pools

4. Harm to Tourism and the Local Economy

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Sincerely


Signature

Full Name (print): JACQUI BUCKLEY

Full Address:

Email (optional):

Date: 16 May 2025

LDJ
Association with Canal: WORK AT
DUNCHURCH POOL
MARINA

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Sincerely,

Full Name:

MICHAEL P.J. WHITTAKER

Full Address:

Email (optional):

Date:

13. 5. 24

Dunchurch Pools

Narrow Boat
Engineer

4. Harm to Tourism and the Local Economy

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Sincerely

Full Name: HARRIET BIDDINGTON

Full Address:

Email (optional)

Date: 7/1/05/25.

canal user & worker. Dunchurch Pools

4. Harm to Tourism and the Local Economy

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Sincerely,

Full Name: AIDAN HINCHITT

Full Address: |

Email (optional)

Date: 13/5/25



Narrow Boat Engineer Dunchurch Pools

4. Harm to Tourism and the Local Economy

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Sincerely,

Full Name:

CLARE ROBERTS

Full Address:

Email (optional):

Date:

16/05/25

Member of staff at Dunchurch Pools Marina.

Harm to Tourism and the Local Economy

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Sincerely



Full Name (print): ANNABELLE DASCALSCU

Full Address:

Email (optional):

Date: 16/5/25

Association with Canal: Member of staff
Dunchurch pools

4. Harm to Tourism and the Local Economy

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Sincerely



Full Name (print): JANINE MCCOMBS

Full Address:

Email (optional)

Date: 16/5/25

Association with Canal:

Member of Staff at Dunchurch Pools

4. Harm to Tourism and the Local Economy

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Sincerely


Signature

Full Name (print):

Full Address:

Email (option)

Date:

Association with Canal:

*BOTTRE & Joiner
Dunchurch
Pools*

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Signature

Full Name (print) _____

Full Address: _____

Email (option: _____

Date: 16.5.25

Association with Canal: *marina engineer
Dunchurch Pools*

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Sincerely

Signature

Full Name (print): Alec Denham

Full Address:

Email (option):

Date: 17-5-2025

Association with Canal:

Tradesman working at the Marina

4. Harm to Tourism and the Local Economy

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Sincerely,

Full Name:

MISS JAYNE BROWNING (Staff)

Full Address:

Email (optional)

Date:

09/05/2025

4. Harm to Tourism and the Local Economy

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Sincerely,



Full Name: STEPHEN JONES

Full Address:

Email (c):

Date: 17/5/25

I work at THE BOATYARD AND FEAR
THAT THE TRAFFIC AND ENVIRONMENTAL
IMPACT WILL ADVERSELY AFFECT MY JOB.
Dunchurch Pools

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Sincerely



Full Name (print): JULIENNE DUNBAR

Full Address:

Email (option):

Date:

17/5/25

Association with Canal:

DUNCHURCH POOLS
CONTRACT WORKER

4. Harm to Tourism and the Local Economy

Rugby Borough and its surrounding districts are uniquely located at the centre of the UK's 7,000 km inland waterways network. The three local canal junctions: Napton, Braunston & Norton, link the UK's northern, southern, eastern and western canal systems. The inland waterways are a significant component of Rugby Borough's tourism offering and represent a major opportunity.

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As set out in this objection letter, the proposed Lodge Farm development would jeopardise Dunchurch Pools as a leisure marina and, therefore, have a major adverse impact on tourism and the local economy.

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This development would:

- Harm the inland waterways by making Dunchurch Pools, a nationally significant inland waterways facility, unviable.
- Harm community health and wellbeing by removing Dunchurch Pools as a sustainable community access hub to nature and the countryside.
- Harm ecology and heritage, by compromising Dunchurch Pools which is a major contributor to local Biodiversity Action Plans, and adversely impacting the Oxford Canal Conservation Area.
- Harm tourism and the local economy by jeopardising Dunchurch Pools, a nationally significant facility for waterways tourism, significant local employer and significant contributor to the local economy.

I urge Rugby Borough Council to remove Site 73 (Lodge Farm) from further consideration in the emerging Local Plan.

Sincerely



Signature

Full Name (print): JOSEPH A. OLIVER

Full Address

Email (optional)

Date:

18th Aug 2025

Association with Canal:

Dunchurch Pools
employee

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Signature

Full Name (print): FELICITY LUXMCORE

Full Address: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000

Email (optional)

Date: 19/5/25 Association with Canal: Work @ Marina

4. Harm to Tourism and the Local Economy

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I urge Rugby Borough Council to remove Site 73 (Lodge Farm) from further consideration in the emerging Local Plan.

Sincerely,

Full Name:

LOUISE ELSON

Full Address:

Email (optional):

Date:

16.5.25

Dunchurch Pool,
* Boatyard employee.

Canal User Objection Letter – Lodge Farm Development (Site 73)

To: Rugby Borough Council – Local Plan Consultation Team

Subject: Formal Objection to Site 73 (Lodge Farm) – Harm to Inland Waterways, Health & Wellbeing, Ecology & Heritage and Local Economy Grounds

Dear Planning Officer,

I am writing to formally object to the proposed inclusion of Site 73 (Lodge Farm) in the preparation of the Rugby Local Plan. My objection focuses on the impact that this development would have on Dunchurch Pools Marina and the harm it would cause to this nationally significant facility. I highlight the consequential harm the Lodge Farm development would cause to the inland waterways, community health & wellbeing, ecology & heritage, local employment and the local economy.

Dunchurch Pools Marina was designed by the architect responsible for the Eden Project and the landscape architect responsible for a number of the Wildfowl & Wetland Trust's nature reserves. It is a nationally significant facility:

- Supporting a vibrant inland waterway
- Providing community access to the countryside
- Making a major contribution to county biodiversity action plans
- Providing significant local employment and economic contribution

Rugby Borough Council, at planning committee, fully endorsed and supported these project objectives.

1. Harm to Inland Waterways

Located at the centre of the UK's inland waterways, Dunchurch Pools provides the following facilities to canal boaters:

- 550 secure off line leisure moorings (approx. half currently constructed)
- Supply Dock offering diesel, gas, coal, logs, water, sewage and rubbish disposal
- Brokerage (boat sales)
- Boatyard maintaining and repairing canal boats
- Parking & washrooms

The consented marina is on track to be the third largest on the UK's inland waterways and is of national significance. It offers essential facilities, without which canal boating is not possible.

Dunchurch Pools' boating customers use the marina for leisure. The site's location is in open countryside, close to nature and extremely tranquil, key reasons why it is so well appreciated, with all berths occupied. Customers choose the marina because of its rural location.

The proposed 633 acre Lodge Farm development, with 2680 houses and employment/retail/education/health/sports build out, is located immediately adjacent to Dunchurch Pools. This urbanisation, with 8,000 residents anticipated and up to 25,000 new car journeys a day, would remove key reasons why leisure boaters appreciate the marina. The seven to ten year construction period would not be tolerated by moorers. The proposed Lodge Farm development would cause Dunchurch Pools to significantly lose its customers.

Marina businesses are extremely sensitive to berth occupancy. The supply dock and boatyard are financially loss making and cross subsidised by berth revenue. The loss of customers due to the proposed Lodge Farm development would make Dunchurch Pools, as a leisure marina, unviable. The inland waterways would lose a nationally significant facility.

2. Harm to Community Health and Wellbeing

Dunchurch Pools works as an access hub to the countryside. It offers the community:

- Open countryside location
- Public access to the marina's 44 acres of parkland and 4km of paths (when complete)
- Public access to the open countryside via six public footpaths which are joined by the site
- Public access to the canal
- Parking (when complete), refreshments, toilets, rubbish disposal and dog bins to support sustainable public access

The Princess of Wales recently stated, 'Nature and the outdoors has been a key part of my recovery from cancer and of my wellbeing'. The COVID 19 experience has underlined the importance of nature and the outdoors to our wellbeing. By providing extensive public access to the countryside, Dunchurch Pools contributes significantly to the community's health & wellbeing.

The proposed 633 acre Lodge Farm development would place Dunchurch Pools in an urban setting rather than in open countryside. The proposed masterplan re sets the marina's parkland as a park for the new town, which extreme high usage Dunchurch Pools would not be able to financially support. Dunchurch Pools would no longer act as a community access hub to the countryside.

3. Harm to Ecology and Heritage

The Dunchurch Pools 88 acre site has been designed with a particular focus on ecological enhancement. A mosaic of woodland, scrub, meadowland, open vegetation, tall herb, ponds, wetland and marginal vegetation is being created. The site links into existing habitats and wildlife corridors such as the Oxford Canal, Great Central Railway (disused), Rainsbrook and Leam valleys. The surrounding open countryside, which includes: Rainsbrook Tributary – Eco Site 22/57, Disused Canal – Eco Site 04/56, Fields at Onley Prison – Eco Site 14/56, Oxford Canal – Eco Site 04/56, Disused Central Railway – Eco Site 02/57 + 02/56 and Draycote Meadows SSSI, is significantly enhanced. Rare and endangered species such as barn owls, skylarks, linnets, bull finches, reed buntings, starlings, swallows, bats, brown hares, otters, great crested newts and grass snakes all currently thrive on the site. Dunchurch Pools has been assessed as a major benefit to the local Biodiversity Action Plans.

The proposed 633 acre Lodge Farm development, with 2680 houses, anticipated 8,000 new residents, pets (including cats) and up to 25,000 new car journeys a day would adversely affect the local ecology. The adverse effect of the seven to ten year construction period would be significant. The major biodiversity benefits of Dunchurch Pools would be negated.

Dunchurch Pools is located on the Oxford Canal which is a heritage Conservation Area. The Conservation Area assessment states, *'The land use policies for the canal seek to allow for the expansion of all canal uses including transport, whilst seeking to conserve the character of the canal Conservation Area, which is the main factor in generating those uses'*. It describes the area as *'open countryside with few other intrusions'*. Clearly the proposed Lodge Farm development would fundamentally change the character of the Conservation Area, a severe adverse impact.

4. Harm to Tourism and the Local Economy

Rugby Borough and its surrounding districts are uniquely located at the centre of the UK's 7,000 km inland waterways network. The three local canal junctions: Napton, Braunston & Norton, link the UK's northern, southern, eastern and western canal systems. The inland waterways are a significant component of Rugby Borough's tourism offering and represent a major opportunity.

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I urge Rugby Borough Council to remove Site 73 (Lodge Farm) from further consideration in the emerging Local Plan.

Sincerely,

Full Name:

ALAN HARVEY

Full Address:

Email (optional):

(BOAT LOANED AT DUNCURCH POOLS MARINA)

Date:

15/5/25

CAROL HARVEY

4. Harm to Tourism and the Local Economy

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Sincerely,

Full Name: Anthony Nicholas

Full Address: 1

Email (optional):

Date: 14-05-2025

Dunchurch Pools Moorer

4. Harm to Tourism and the Local Economy

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Sincerely,

Full Name: MRS VERA OLDHAM (DUNCHURCH POOLS
MOORER)

Full Address: 1

Email (optional):

Date: 13/5/25

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Sincerely,

Full Name:

Gary Mann

Della Mann

Full Address:

← as

Email (optional):

Date:

16/5/25

Boat owners,
Meeting at
Dunchurch Pools
Marina.

4. Harm to Tourism and the Local Economy

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Sincerely,

Full Name: Billy Major

Full Address: 5
moored

Email (optional):

Date: 12/05/25

Dunchurch Pools Moored

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- Harm tourism and the local economy by jeopardising Dunchurch Pools, a nationally significant facility for waterways tourism, significant local employer and significant contributor to the local economy.

I urge Rugby Borough Council to remove Site 73 (Lodge Farm) from further consideration in the emerging Local Plan.

Sincerely,

Full Name:

Rachael Jennings

— annex —

Date:

12-5-25

Dunchurch Pools Moored

4. Harm to Tourism and the Local Economy

Rugby Borough and its surrounding districts are uniquely located at the centre of the UK's 7,000 km inland waterways network. The three local canal junctions: Napton, Braunston & Norton, link the UK's northern, southern, eastern and western canal systems. The inland waterways are a significant component of Rugby Borough's tourism offering and represent a major opportunity.

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I urge Rugby Borough Council to remove Site 73 (Lodge Farm) from further consideration in the emerging Local Plan.

Sincerely



Full Name (print): JAMES RUSSELL TAYLOR

Full Address:

Email (optional):

Date:

16/5/25

Association with Canal:

Moorer.

4. Harm to Tourism and the Local Economy

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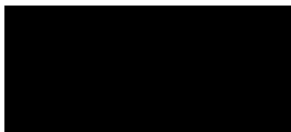
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Sincerely,



Full Name: KATIE FRASER

Full Address:

Email (optional):

Date: 12/5/25

(Moore at Dunchurch Pools)

4. Harm to Tourism and the Local Economy

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Signed

Full Name:

Full Address:

Email (optional):

Date:

12/5/2025

Dunchurch Pools, Noor

4. Harm to Tourism and the Local Economy

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Sincerely,

Full Name: ADRIAN PELL

Full Address: _____

Email (optional)

Date: 9-5-25

Dunchurch Pools Moorer

4. Harm to Tourism and the Local Economy

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Sincerely,

Full Name:

Richard Oldham

Full Address:

Email (optional):

Date:

13/5/25

(Dunchurch Pools Marina Boat Owner)

4. Harm to Tourism and the Local Economy

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Sincerely,

[Redacted Signature]

Full Name:

DEBORAH ROBINSON

MOORED AT

DUNCHURCH POOLS

9/8/25

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Sincerely,

Full Name:

PAUL TINDALL

Full Address:

1,

Email (optional):

Date:

9/5/25

(BOAT)

4. Harm to Tourism and the Local Economy

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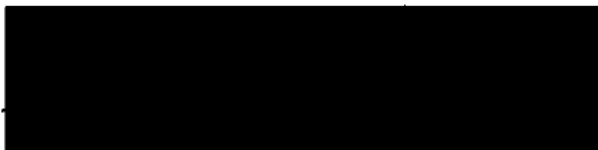
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Sincerely,



Full Name: SUSAN TINDALL

Full Address: _____

Email (optional): _____

Date: 9/5/25

(DOAT)

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Sincerely,

Full Name: COLIN SWALE (BOAT - MUDON WATERS)

Full Address:

Email (optional)

Date: 9/5/25

4. Harm to Tourism and the Local Economy

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Sincerely,



Full Name: SUSAN BAILEY

Full Address:

Email (optional):

Date:

9/5/25

owner of NB Dreamcatcher
DLP NO4 12. since June
2020.

m

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Full Name:

Full Address:

Email (optional)

Date:

09/05/25

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Sincerely,

Full Name:

ANTHONY WALKER

Full Address:

Email (optional):

Date:

9.5.2025

(BOAT MOORED @
DUNCHURCH POOLS
MARINA)

4. Harm to Tourism and the Local Economy

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Sincerely,

Full Name:

JARROD TOMBLIN

Full Address:

Email (optional):

Date:

9.05.2025

Have boat at Dunchurch
Pools

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Sincerely,

Full Name: DILL DAWSON

Full Address: _____

Email (optional): _____

Date: 8/5/25

BOAT OWNER MOORED AT DUNCHURCH POOL

4. Harm to Tourism and the Local Economy

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Sincerely,

Full Name:

RON BAKER

Full Address:

11

Email (optional):

Date:

8/5/25

- 9, UK

BOAT OWNER MOORED AT DUNCHURCH POOL

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I urge Rugby Borough Council to remove Site 73 (Lodge Farm) from further consideration in the emerging Local Plan.

Sincerely,

Full Name:

Full Address:

Email (optional):

Date:

Samanta Fitzgerald

*Barwell Mill Harbours
Dunchurch Pools Meiners*

8/16/5/2005

4. Harm to Tourism and the Local Economy

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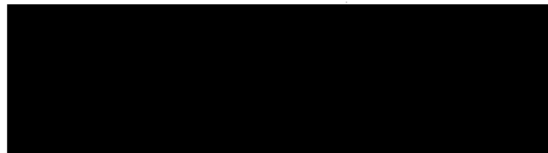
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Full Name (print): S. FITZGERALD

Full Address:

Email (optional):

Date: 16/5/25

Association with Canal: Moore

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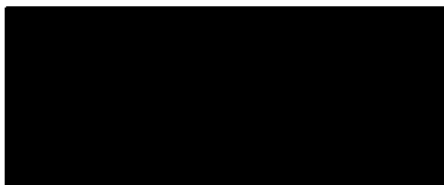
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Sincerely



Full Name (print): Am PRESTIGE

Full Address:

Email (optional)

Date: 16.5.25

Association with Canal: Narrowboat owner

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Full Name (print): *John John Ralphs*

Annie Ralphs

Full Address:

Email (optional):

Date: *19 May 2025*

Association with Canal:

*Narrowboat owner at
Dunchurch Pools*

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Sincerely

Signature

Full Name (print):

PATRICK JAM

Full Address:

1245

Email (optional)

Date:

19/5/23

Association with Canal:

MOORER / CHINE
WORKER!

Harm to Tourism and the Local Economy

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Sincerely



Full Name (print): DAVID ATLAS

Full Address:

4E
17

Email (optional):

Date:

19/5/25

Association with Canal:

BOATERS

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Sincerely



Full Name (print): DAVID WHITE

Full Address:

Email (optional):

Date: 19/5/25

Association with Canal: BOAT OWNER.

Objection Letter – Lodge Farm Development (Site 73)

To: Rugby Borough Council – Local Plan Consultation Team

Subject: Formal Objection to Site 73 (Lodge Farm) – Environmental and Landscape Grounds

Dear Planning Officer,

I am writing to formally object to the proposed allocation of Site 73 (Lodge Farm) in the Rugby Local Plan. My objection focuses on the ecological, biodiversity, and landscape impacts of this development, which would cause irreversible damage to one of Warwickshire's most ecologically valuable rural corridors: the Leam Valley.

1. The Leam Valley: A Protected and Sensitive Landscape

The Lodge Farm site lies within the southern Leam Valley—a landscape defined by:

- Extensive open farmland and ancient hedgerows
- Sparse, historic settlement patterns
- County-priority habitats and high species richness (Warwickshire State of Habitats Report, 2025, pp. 1–5)

The proposed development would urbanise 105–110 hectares, or roughly one-quarter of this valued landscape, severing its ecological and visual continuity.

This level of encroachment directly contradicts national policy in the National Planning Policy Framework (NPPF, 2024, Paragraph 187), which calls for the preservation of the “intrinsic character and beauty of the countryside” and a commitment to biodiversity net gain.

2. Impact on Priority Species and Protected Habitats

Numerous priority species would be affected by this development, including:

- Farmland birds such as skylarks, lapwings, linnets, and yellowhammers—species that are nationally declining
- Protected mammals like brown hares and bats
- Great Crested Newts and Barn Owls, both of which require undisturbed green corridors

Local surveys (e.g. Toft Farm, near Dunchurch) record some of Warwickshire's highest densities of these birds. Natural England guidance recommends a 400-metre buffer zone around their nesting habitats—yet this proposal would place dense housing directly in the centre of their known breeding area (Natural England, 2019, pp. 16–18).

3. Fragmentation of Green Infrastructure and Ecological Corridors

The Leam Valley is part of a strategic ecological corridor linking:

- The Dunsmore and Feldon landscape area to the west
- The Northamptonshire Uplands and Leicestershire Vales to the east

According to the Sub-regional Green Infrastructure Strategy (2024, pp. 15–18), this corridor is essential for:

- Pollinator movement
- Genetic exchange
- Flood resilience
- Species migration in response to climate change

By placing an urban barrier of 2,800 homes across the valley floor, the development would interrupt critical wildlife migration routes, isolate populations, and reduce the long-term resilience of Warwickshire's ecosystems.

4. Draycote Meadows and Nearby Sensitive Sites at Risk

Draycote Meadows SSSI, located just west of the site, relies on unbroken ecological links through surrounding farmland. Introducing thousands of homes nearby—with lighting, noise, runoff, and pollution—risks long-term damage to the pollination networks, soil health, and water quality that support its rare species.

This violates Rugby Local Plan Policy NE3 and the NPPF's biodiversity obligations.

5. Major Adverse Landscape Impact – Already Rejected by the Inspector

The site was rejected by the Planning Inspector in the 2019 Local Plan Examination: "Development at Lodge Farm would cause major adverse landscape effects that cannot be mitigated due to the valley's openness."

It is highly visible from:

- Dunchurch village
- Dunchurch Pools Marina and the Oxford Canal Conservation Area
- The A45 corridor
- Barby Hill and the Rainsbrook escarpment

The development would urbanise this tranquil rural setting, causing permanent visual harm.

6. Precedent: Nationally Significant Sites Rejected on Similar Grounds

Comparable national cases—such as Lodge Hill in Kent—have been rejected due to risks to rare species and landscape harm. The earlier rejection of Lodge Farm from Rugby's own Local Plan on ecological and landscape grounds sets a strong precedent.

Conclusion

This development would:

- Destroy habitats of protected species
- Fragment ecological corridors
- Cause permanent harm to the Leam Valley's rural character
- Contravene national and local environmental policy

I urge Rugby Borough Council to reject Site 73 (Lodge Farm) from the Local Plan.

Sincere

Full Name: ELIZABETH SIVITER
Full Address: ~~111~~ "111" SIVITER

Email (optional):
Date:

Dunchurch Pools Hoarer

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Full Name: NATASHA HARDING

Full Address:

Email (optional)

Date: 3/5/25

Boat owner

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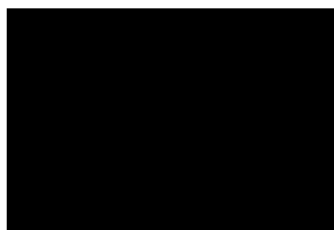
Sincerely,

Full Name: NICHOLAS LUZAR — *Narrow back own*
Full

Em:

Date: 3/5/25

Bea done J.



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Sincerely,

[Redacted Signature]

Narrow boat owner

Full Name: MANDY LUZAR

Full

Em:

Dat:

3525

Boat owner

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Sincerely,

Full Name: MAURICE D. JONES
Full Address: _____

Email (optional): _____

Date: 3.5.2025

MODER AT DUNCHURCH POOLS
MAURICEJO

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Sincerely,

EDWARD MORRIS

Full Name:

Full Address:

NARROWBOAT OWNER @
Dunchurch Pools

Email (optional):

Date:

3.5.25

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Full Name:
Full Address:

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Date: 3.5.25

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Sincerely,

Full Name: Scott Grosvenor - Canal User / narrow boat owner
Full Address:

Email (optional):

Date: 8/5/25

Mooring.

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I urge Rugby Borough Council to reject Site 73 (Lodge Farm) from the Local Plan.

Sincerely,

Full Name: Fleur Clarke - Council User / narrow boat owner
Full Address

Email (optio

Date:

31/5/25.

Mooring.

By placing an urban barrier of 2,800 homes across the valley floor, the development would interrupt critical wildlife migration routes, isolate populations, and reduce the long-term resilience of Warwickshire's ecosystems.

4. Draycote Meadows and Nearby Sensitive Sites at Risk

Draycote Meadows SSSI, located just west of the site, relies on unbroken ecological links through surrounding farmland. Introducing thousands of homes nearby—with lighting, noise, runoff, and pollution—risks long-term damage to the pollination networks, soil health, and water quality that support its rare species.

This violates Rugby Local Plan Policy NE3 and the NPPF's biodiversity obligations.

5. Major Adverse Landscape Impact – Already Rejected by the Inspector

The site was rejected by the Planning Inspector in the 2019 Local Plan Examination: "Development at Lodge Farm would cause major adverse landscape effects that cannot be mitigated due to the valley's openness."

It is highly visible from:

- Dunchurch village
- Dunchurch Pools Marina and the Oxford Canal Conservation Area
- The A45 corridor
- Barby Hill and the Rainsbrook escarpment

The development would urbanise this tranquil rural setting, causing permanent visual harm.

6. Precedent: Nationally Significant Sites Rejected on Similar Grounds

Comparable national cases—such as Lodge Hill in Kent—have been rejected due to risks to rare species and landscape harm. The earlier rejection of Lodge Farm from Rugby's own Local Plan on ecological and landscape grounds sets a strong precedent.

Conclusion

This development would:

- Destroy habitats of protected species
- Fragment ecological corridors
- Cause permanent harm to the Leam Valley's rural character
- Contravene national and local environmental policy

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Full Name:

Full Address:

Email (optional):

Date:

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Sincerely,

Full Name: PATRICK DROMGOUL

Full Address: ?

Email (optional):

Date:

Dunchurch Pools Moore

4. Harm to Tourism and the Local Economy

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- Harm community health and wellbeing by removing Dunchurch Pools as a sustainable community access hub to nature and the countryside.
- Harm ecology and heritage, by compromising Dunchurch Pools which is a major contributor to local Biodiversity Action Plans, and adversely impacting the Oxford Canal Conservation Area.
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Signature

Full Name (print): S. J. WARD

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Date: 18/5/26 Association with Canal: Boat

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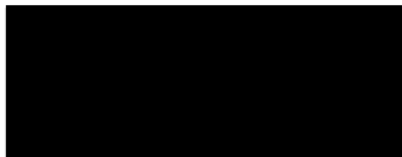
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Signature

Full Name (print): ELANE REVELL

Full Address:

Email (optional)

Date: 18/05/25

Association with Canal:

Moore
Dunchurch Pools

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Sincerely



Penelope A French

Signature

Full Name (print):

JONATHAN FRENCH Penelope French

Full Address:

Email (optional):

Date:

Association with Canal:

*MOORING HOLDER
Dunchurch Boat Marine
for 6 years*

4. Harm to Tourism and the Local Economy

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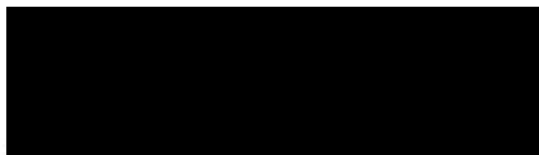
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Sincerely



Signature

Full Name (print): RICHARD PARDOE

Full Address:

Email (optional):

Date: 18/05/25

Association with Canal:

Boat Owner at
Dunchurch Pools
Marina.

419E

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Sincerely



Signature

Full Name (print): Mrs C. A. Pardoe (PARDOE)

Full Address: 14

Email (optional):

Date: 18/05/25

Association with Canal: Canal User From
Dunchurch Pools.

4. Harm to Tourism and the Local Economy

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Sincerely



Signature

Full Name (print): Mrs Louise Pardoe

Full Address:

Email (optional):

Date: 18/05/25

Association with Canal:

Boat owner at
Dunchurch Pools Marina

Canal User Objection Letter – Lodge Farm Development (Site 73)

To: Rugby Borough Council – Local Plan Consultation Team

Subject: Formal Objection to Site 73 (Lodge Farm) – Harm to Inland Waterways, Health & Wellbeing, Ecology & Heritage and Local Economy Grounds

Dear Planning Officer,

I am writing to formally object to the proposed inclusion of Site 73 (Lodge Farm) in the preparation of the Rugby Local Plan. My objection focuses on the impact that this development would have on Dunchurch Pools Marina and the harm it would cause to this nationally significant facility. I highlight the consequential harm the Lodge Farm development would cause to the inland waterways, community health & wellbeing, ecology & heritage, local employment and the local economy.

Dunchurch Pools Marina was designed by the architect responsible for the Eden Project and the landscape architect responsible for a number of the Wildfowl & Wetland Trust's nature reserves. It is a nationally significant facility:

- Supporting a vibrant inland waterway
- Providing community access to the countryside
- Making a major contribution to county biodiversity action plans
- Providing significant local employment and economic contribution

Rugby Borough Council, at planning committee, fully endorsed and supported these project objectives.

1. Harm to Inland Waterways

Located at the centre of the UK's inland waterways, Dunchurch Pools provides the following facilities to canal boaters:

- 550 secure off line leisure moorings (approx. half currently constructed)
- Supply Dock offering diesel, gas, coal, logs, water, sewage and rubbish disposal
- Brokerage (boat sales)
- Boatyard maintaining and repairing canal boats
- Parking & washrooms

The consented marina is on track to be the third largest on the UK's inland waterways and is of national significance. It offers essential facilities, without which canal boating is not possible.

Dunchurch Pools' boating customers use the marina for leisure. The site's location is in open countryside, close to nature and extremely tranquil, key reasons why it is so well appreciated, with all berths occupied. Customers choose the marina because of its rural location.

The proposed 633 acre Lodge Farm development, with 2680 houses and employment/retail/education/health/sports build out, is located immediately adjacent to Dunchurch Pools. This urbanisation, with 8,000 residents anticipated and up to 25,000 new car journeys a day, would remove key reasons why leisure boaters appreciate the marina. The seven to ten year construction period would not be tolerated by moorers. The proposed Lodge Farm development would cause Dunchurch Pools to significantly lose its customers.

Marina businesses are extremely sensitive to berth occupancy. The supply dock and boatyard are financially loss making and cross subsidised by berth revenue. The loss of customers due to the proposed Lodge Farm development would make Dunchurch Pools, as a leisure marina, unviable. The inland waterways would lose a nationally significant facility.

2. Harm to Community Health and Wellbeing

Dunchurch Pools works as an access hub to the countryside. It offers the community:

- Open countryside location
- Public access to the marina's 44 acres of parkland and 4km of paths (when complete)
- Public access to the open countryside via six public footpaths which are joined by the site
- Public access to the canal
- Parking (when complete), refreshments, toilets, rubbish disposal and dog bins to support sustainable public access

The Princess of Wales recently stated, 'Nature and the outdoors has been a key part of my recovery from cancer and of my wellbeing'. The COVID 19 experience has underlined the importance of nature and the outdoors to our wellbeing. By providing extensive public access to the countryside, Dunchurch Pools contributes significantly to the community's health & wellbeing.

The proposed 633 acre Lodge Farm development would place Dunchurch Pools in an urban setting rather than in open countryside. The proposed masterplan re'sets the marina's parkland as a park for the new town, which extreme high usage Dunchurch Pools would not be able to financially support. Dunchurch Pools would no longer act as a community access hub to the countryside.

3. Harm to Ecology and Heritage

The Dunchurch Pools 88 acre site has been designed with a particular focus on ecological enhancement. A mosaic of woodland, scrub, meadowland, open vegetation, tall herb, ponds, wetland and marginal vegetation is being created. The site links into existing habitats and wildlife corridors such as the Oxford Canal, Great Central Railway (disused), Rainsbrook and Leam valleys. The surrounding open countryside, which includes: Rainsbrook Tributary - Eco Site 22/57, Disused Canal - Eco Site 04/56, Fields at Onley Prison - Eco Site 14/56, Oxford Canal - Eco Site 04/56, Disused Central Railway - Eco Site 02/57 + 02/56 and Draycote Meadows SSSI, is significantly enhanced. Rare and endangered species such as barn owls, skylarks, linnets, bull finches, reed buntings, starlings, swallows, bats, brown hares, otters, great crested newts and grass snakes all currently thrive on the site. Dunchurch Pools has been assessed as a major benefit to the local Biodiversity Action Plans.

The proposed 633 acre Lodge Farm development, with 2680 houses, anticipated 8,000 new residents, pets (including cats) and up to 25,000 new car journeys a day would adversely affect the local ecology. The adverse effect of the seven to ten year construction period would be significant. The major biodiversity benefits of Dunchurch Pools would be negated.

Dunchurch Pools is located on the Oxford Canal which is a heritage Conservation Area. The Conservation Area assessment states, *'The land use policies for the canal seek to allow for the expansion of all canal uses including transport, whilst seeking to conserve the character of the canal Conservation Area, which is the main factor in generating those uses'*. It describes the area as *'open countryside with few other intrusions'*. Clearly the proposed Lodge Farm development would fundamentally change the character of the Conservation Area, a severe adverse impact.

4. Harm to Tourism and the Local Economy

Rugby Borough and its surrounding districts are uniquely located at the centre of the UK's 7,000 km inland waterways network. The three local canal junctions: Napton, Braunston & Norton, link the UK's northern, southern, eastern and western canal systems. The inland waterways are a significant component of Rugby Borough's tourism offering and represent a major opportunity.

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I urge Rugby Borough Council to remove Site 73 (Lodge Farm) from further consideration in the emerging Local Plan.

Sincerely,

Full Name:



- Cecil Viner

Full Address:

Email (optional):

Date:

15/5/25

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Sincerely

Full Name: JANET E. DENCER - Council User

Full Address

Email (optional)

Date: 14th May '25

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Sincerely,

Full Name:

BARBARAS LUMMORE

Full Address:

2

Email (optional)

Date:

11/05/2018

U

I am a canal user

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Sincerely,

Full Name: GARETH BOWERS

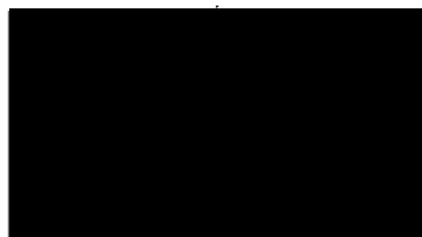
Full Address: (

Email (optional):

Date:

11/5/25

Canal User



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Sincerely,

Full Name: COLETTE BODERS

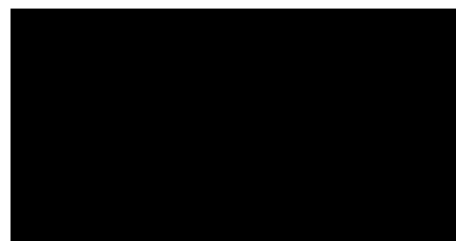
Full Address:

Email (optional):

Date:

11/5/25

Canal User



4. Harm to Tourism and the Local Economy

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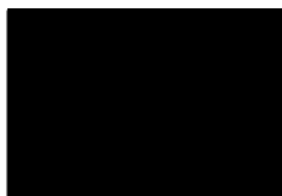
Sincerely,

Full Name: PHILIP RICHARD BARROWS

Full Address:

Email (optional):

Date: 9/5/25



Canal User

4. Harm to Tourism and the Local Economy

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Sincerely,

Full Name: Kim Taylor

Full Address:

Email (optional)

Date: 9/5/25

Council User

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Sincerely,

Full Name:

Kathleen Eyton - Canal User

Full Address:

Email (optional):

Date:

15/5/25

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Sincerely,

Full Name:

HENRY PERRYMAN

Full Address:

Email (optional):

Date:

9/5/25

Cenc) User

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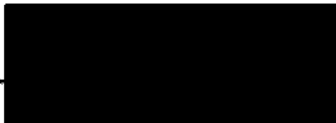
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Sincerely,



Full Name: LISA DE ROSA

Full Address: N

Email (optional):

Date: 16 MAY 25

Boat Owner & Canal User

4. Harm to Tourism and the Local Economy

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Full Name:

Full

Email:

Date:

16/5/25

Boat Owner & Canal User

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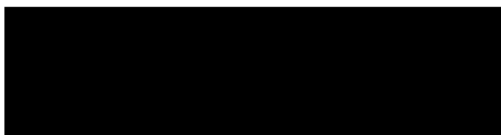
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Full Name (print):

ANDREW KENDALL

Association with Canal:

17/05/25

CANAL USER

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Sincerely


Signature

Full Name (print): KRISTINA MORDOKHOVITCH

1

1

Date:

17.05.25

Association with Canal:

CANAL USER

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Full Address:

Email (optional):

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Full Name: RUTH DIANE OWEN

Full Address: T

Email (optional):

Date:

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Full Name:

JOHN JOSEPH CARROLL

Full Address:

Email (optional):

Date: 17/5/2025

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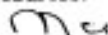
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Full Address:



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Full Name: Eileen G. Pettifer

Full Address:

Email (optional):

Date: 15th May 2025

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Full Name: LANA McGILL

Full Address: 9

Email (optional):

Date: 15/5/25

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Full Name: Thomas Finn

Full Address:

Email (optional):

Date: 15/05/25

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- Harm tourism and the local economy by jeopardising Dunchurch Pools, a nationally significant facility for waterways tourism, significant local employer and significant contributor to the local economy.

I urge Rugby Borough Council to remove Site 73 (Lodge Farm) from further consideration in the emerging Local Plan.

Sincerely,

[Redacted Signature]

Full Name: AUREY M MITCHELL.

RY.

Full Address: 12

EL

Email (optional): —

Date: 15.05.25

4. Harm to Tourism and the Local Economy

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Sincerely,



Full Name: *Susan Ann Branigan*

Full Address: /

Email (optional):

Date: *15/5/25*

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Sincerely,

Full Name: Lyn Gerrard

Full Address: 1

Email (optional):

Date: 15 May 2025

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Full Name:

RACHEL RUST

Full Address:

2

Email (optional):

Date:

16-5-25

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Full Name: *Helen Johnson*

Full Address: _____

Email (optional): _____

Date: _____

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Full Name: CHRISTINE SMITH

Full Address: —

Email (optional):

Date:

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Full Name:

S. MIDDLETON

Full Address:

Email (optional):

Date:

16/5/25

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Sincerely,

Full Name: MRS GILL LEPPARD

MRS SUE RICHARDSON

Full Address:

Email (optional)

Date: 15.5.25

15.5.25

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Full Name: M. VASPER

Full Address:

Email (optional):

Date: 16-5-25

E

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Sincerely,



Full Name: DONALD ALLARD GRANT

Full Address:

Email (optional)

Date: MAY 17 2025

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Full Name: ANYA LEWIS

Full Address:

Email (option):

Date: 17.5.2025

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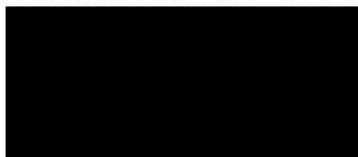
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Full Name: ALAN BELGRAVE

Full Address:

Email (optional):

Date:

15-05-25

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Sincerely,

Full Name: L. J. KEMB

Full Address: 4

Email (optional): _____

Date:

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Full Name: HORRAINE GEDDES

Full Address: 4

Email (optional): _____

Date: 16 MAY 2025

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Full Name: GRAHAM GEEDIES

Full Address:

Email (optional):

Date:

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Full Name: Sheila Hland

Full Address: 1

Email (optional):

Date: 15.5.25

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Full Name:

GLENNIS ROWE

Full Address:

Email (optional):

Date:

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I urge Rugby Borough Council to remove Site 73 (Lodge Farm) from further consideration in the emerging Local Plan.

Sincerely,



Full Name: LORRAINE WALLS

Full Address:

Email (optional):

Date: 15th June 2025

4. Harm to Tourism and the Local Economy

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Sincerely,



Full Name: *Mavis Wills*

Full Address:

Email (option) _____

Date: *15-5-25*

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Sincerely,

Full Name:

HERNEY JONES.

Full Address:

51

43

Email (optional):

Date:

18/5/2025.

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Sincerely,

Full Name: MARY EVANS

Full Address: L

Email (optional):

Date:

16-05-25

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Full Name: BARBARA FORMBY

Full Address:

B

Email (optional)

Date: 16/05/25

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Full Name: BECKY HADLEY

Full Address:

Email (optional):

Date: 16/5/25

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Sincerely,



Full Name: ROBERT BRUCE BUSBY

Full Address:

Email (optional):

Date: 16-05-2025

Harm to Tourism and the Local Economy

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Sincerely,

Full Name:

Full Address:

Email (optional):

Date:

Bernard Sutton
16/5/25

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Sincerely,

Full Name:

DAVID JOHN MCNAUGHTON

Full Address:

Email (optional):

Date:

16/1/2025

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Full Address:

Email (optional):

Date:

16.5.25

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Full Name: VALERIE HALL

Full Address:

Email (optional): _____

Date: 15. 5. 2025

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Full Name:

Brian Hall

Full Address:

Email (optional):

Date:

15-5-2025

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Full Name: TIMOTHY JOHN SETTLE

Full Address:

Email (optional)

Date: 15/5/2025.

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Full Name: RACHAEL SETTLE

Full /

Email (optional):

Date: 15/05/25

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Full Name: JEREMY BRETT MURPHY

Full Address:

Email (optional)

Date: 17/05/25

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Sincerely,

Full Name: DIANE MACKNIGHT

Full Address: 1

Email (optional): _____

Date:

16.5.25.

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- Harm tourism and the local economy by jeopardising Dunchurch Pools, a nationally significant facility for waterways tourism, significant local employer and significant contributor to the local economy.

I urge Rugby Borough Council to remove Site 73 (Lodge Farm) from further consideration in the emerging Local Plan.



Full Name: SANDRA LORNA GASSER

Email (optional)

Date:

16.5.25

4. Harm to Tourism and the Local Economy

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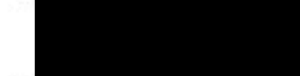
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Full Name: ANTONY DAVID GASSER

Full Address:

Email (optional):

Date: 16th APRIL 2025

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Full Name: LYNN BUSBY.

Full Address:

Email (optional)

Date: 16/05/25.

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Sincerely,



Full Name: *Connie Palmer*

Full Address

Email (optional): _____

Date: *18/5/25*

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Full Name: Luke Norman

Full Address:

Email (optional)

Date:

17/5/25

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Sincerely,



Full Name:

ERIC CHARLES PALMER

Full Address:

Email (optional):

Date:

17/5/25

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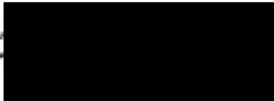
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Full Name: *Steven Palmer*

Full Address:

Email (optional) _____

Date: *17/5/25*

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Sincerely,

Full Name:

PAULA PALMER

Full Address:

Email (optional)

Date:

17-5-2025.

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Sincerely,

Full Name: MARGARET CHARE BEECH

Full Address:

Email (optional):

Date: 18/05/2025

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Full Name: EDMUND JOSEPH BEECH.

Full Address:

Email (optional):

Date: 18 May 2025

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Sincerely,

Full Name: Elizabeth Oaks

Full

Email

Date:

15/04/2025

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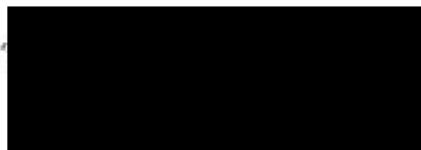
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Full Name: NORMAN ADAMS OATES.

Full Address:

Email (optio

Date: 15.05.25

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Sincerely,

Full Name:

Mrs Andrea Hughes

Full Address:

Email (optional), _____

Date:

15.5.25.

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Sincerely,

Full Name:

ALAN HUGHES

Full Address:

LOSE

Email (optional),

Date:

15/5/25

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Sincerely,



Full Name:

MRS JOYCE LYNN JACKSON

Full Address:

Email (optional):

Date:

15/5/25

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Sincerely,

Full Name:

ANDREW GRENIDZAK

Full Address:

Email (optional):

Date:

17.5.25

4. Harm to Tourism and the Local Economy

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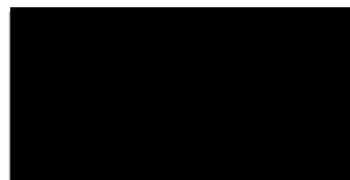
Sincerely,

Full Name: JOSH TAYLOR WATSON

Full Address: 2
C

Email (optional):

Date: 17/05/25



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Full Name: S. GUNDELL

M.

Date: 17/5/25

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Sincerely,

Full Name:

Clare Louise

Full Address:

Email (optional)

Date:

17.05.25

CCM

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Sincerely,



Full Name: JOE RAY

Full Address

Email (optional):

Date: 15/5/25

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Full Name:

ANTHONY RAY.

Full Address:

Email (optional):

Date:

15/5/25.

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Sincerely,

[Redacted Signature]

Full Name: SUSAN JOHNSON

Address:

Date:

15/05/25

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Sincerely

Full Name: JOANNE LEWIS

Full Address:

Email (optional):

Date: 16 MAY
2025

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Sincerely,



Full Name: STUART MALCOLM LEWIS

Full Address:

Email (optional): 161512E

Date:

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[Redacted Signature]

Full Name: RICHARD SACKSON

Full Address:

Email (optional):

Date: 15/5/25

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S

Full Name: *Patricia James*

Full Address:

Email (optional):

Date: *15/5/25*

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Sincerely,



Full Name:

James Edward Rowley

Full Address:

Email (optional):

Date:

14 May 2022

4. Harm to Tourism and the Local Economy

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Full Name: Janet Rowley

Full Address:

Email (optional):

Date: 15/5/25

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Full Name: Kim BENDZAK.

Full Address:

Email (optional):

Date:

17.5.25.

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Sincerely

Signature

Full Name (print): HAZEL ATLAS

Full Address:

Email (optional):

Date: 14/5/25

Association with Canal: GRAND UNION

4. Harm to Tourism and the Local Economy

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Si

Full Name (print):

PATRICIA FISHER

Full Address:

Email (optional):

Date:

19.5.25

Association with Canal:

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Sincerely,

Full Name:

NICK WOLFE *

Full Address

BR

Email (optional):

Date:

18/05/25

* BOAT OWNER/OPERATOR.

STAFF

OK

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As set out in this objection letter, the proposed Lodge Farm development would jeopardise Dunchurch Pools as a leisure marina and, therefore, have a major adverse impact on tourism and the local economy.

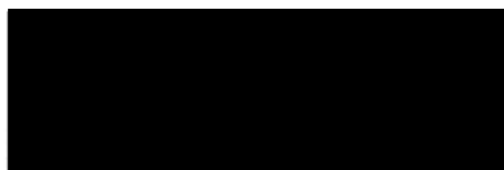
Conclusion

This development would:

- Harm the inland waterways by making Dunchurch Pools, a nationally significant inland waterways facility, unviable.
- Harm community health and wellbeing by removing Dunchurch Pools as a sustainable community access hub to nature and the countryside.
- Harm ecology and heritage, by compromising Dunchurch Pools which is a major contributor to local Biodiversity Action Plans, and adversely impacting the Oxford Canal Conservation Area.
- Harm tourism and the local economy by jeopardising Dunchurch Pools, a nationally significant facility for waterways tourism, significant local employer and significant contributor to the local economy.

I urge Rugby Borough Council to remove Site 73 (Lodge Farm) from further consideration in the emerging Local Plan.

Sincerely



Full Name (print): **DARREN ROBERTS**

Full Address:

Email (optional):

Date: **18/6/25**

Association with Canal: **I live and work on it**

Objection Letter – Lodge Farm Development (Site 73)

To: Rugby Borough Council – Local Plan Consultation Team

Subject: Formal Objection to Site 73 (Lodge Farm) – Environmental and Landscape Grounds

Dear Planning Officer,

I am writing to formally object to the proposed allocation of Site 73 (Lodge Farm) in the Rugby Local Plan. My objection focuses on the ecological, biodiversity, and landscape impacts of this development, which would cause irreversible damage to one of Warwickshire's most ecologically valuable rural corridors: the Leam Valley.

1. The Leam Valley: A Protected and Sensitive Landscape

The Lodge Farm site lies within the southern Leam Valley—a landscape defined by:

- Extensive open farmland and ancient hedgerows
- Sparse, historic settlement patterns
- County-priority habitats and high species richness (Warwickshire State of Habitats Report, 2025, pp. 1–5)

The proposed development would urbanise 105–110 hectares, or roughly one-quarter of this valued landscape, severing its ecological and visual continuity.

This level of encroachment directly contradicts national policy in the National Planning Policy Framework (NPPF, 2024, Paragraph 187), which calls for the preservation of the “intrinsic character and beauty of the countryside” and a commitment to biodiversity net gain.

2. Impact on Priority Species and Protected Habitats

Numerous priority species would be affected by this development, including:

- Farmland birds such as skylarks, lapwings, linnets, and yellowhammers—species that are nationally declining
- Protected mammals like brown hares and bats
- Great Crested Newts and Barn Owls, both of which require undisturbed green corridors

Local surveys (e.g. Toft Farm, near Dunchurch) record some of Warwickshire's highest densities of these birds. Natural England guidance recommends a 400-metre buffer zone around their nesting habitats—yet this proposal would place dense housing directly in the centre of their known breeding area (Natural England, 2019, pp. 16–18).

3. Fragmentation of Green Infrastructure and Ecological Corridors

The Leam Valley is part of a strategic ecological corridor linking:

- The Dunsmore and Feldon landscape area to the west
- The Northamptonshire Uplands and Leicestershire Vales to the east

According to the Sub-regional Green Infrastructure Strategy (2024, pp. 15–18), this corridor is essential for:

- Pollinator movement
- Genetic exchange
- Flood resilience
- Species migration in response to climate change

By placing an urban barrier of 2,800 homes across the valley floor, the development would interrupt critical wildlife migration routes, isolate populations, and reduce the long-term resilience of Warwickshire's ecosystems.

4. Draycote Meadows and Nearby Sensitive Sites at Risk

Draycote Meadows SSSI, located just west of the site, relies on unbroken ecological links through surrounding farmland. Introducing thousands of homes nearby—with lighting, noise, runoff, and pollution—risks long-term damage to the pollination networks, soil health, and water quality that support its rare species.

This violates Rugby Local Plan Policy NE3 and the NPPF's biodiversity obligations.

5. Major Adverse Landscape Impact – Already Rejected by the Inspector

The site was rejected by the Planning Inspector in the 2019 Local Plan Examination: "Development at Lodge Farm would cause major adverse landscape effects that cannot be mitigated due to the valley's openness."

It is highly visible from:

- Dunchurch village
- Dunchurch Pools Marina and the Oxford Canal Conservation Area
- The A45 corridor
- Barby Hill and the Rainsbrook escarpment

The development would urbanise this tranquil rural setting, causing permanent visual harm.

6. Precedent: Nationally Significant Sites Rejected on Similar Grounds

Comparable national cases—such as Lodge Hill in Kent—have been rejected due to risks to rare species and landscape harm. The earlier rejection of Lodge Farm from Rugby's own Local Plan on ecological and landscape grounds sets a strong precedent.

Conclusion

This development would:

- Destroy habitats of protected species
- Fragment ecological corridors
- Cause permanent harm to the Leam Valley's rural character
- Contravene national and local environmental policy

I urge Rugby Borough Council to reject Site 73 (Lodge Farm) from the Local Plan.

Sincerely,

Full Name: Ryan Harmon - Narrow boat engineer
Full Address: _____

Email (optional): _____

Date: 4/5/25

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I urge Rugby Borough Council to reject Site 73 (Lodge Farm) from the Local Plan.

Sincerely,

Full Name:

Full Address:

STEPHEN CRATCHLEY

- Canal User

Email (optional):

Date:

3.5.25