

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official
use only)

**Name of the Local Plan to which
this representation relates:**

Rugby Borough Council Proposed
Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026
By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation**
in the subject line, OR by post to: Development Strategy, Town Hall, Evreux
Way, Rugby, CV21 2RR.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each
representation you wish to make.

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Katrina"/>	<input type="text"/>
Last Name	<input type="text" value="Jones"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value=""/>	<input type="text"/>
Address Line 1	<input type="text" value=""/>	<input type="text"/>
Line 2	<input type="text" value=""/>	<input type="text"/>
Line 3	<input type="text" value=""/>	<input type="text"/>
Line 4	<input type="text" value=""/>	<input type="text"/>
Post Code	<input type="text" value=""/>	<input type="text"/>
Telephone Number	<input type="text" value=""/>	<input type="text"/>

E-mail Address

(where relevant)

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

Name or Organisation: BARBY & ONLEY PARISH COUNCIL

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

Local Plan Paragraph

Local Plan Policy

EN3

Policies Map

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

No

(2) is Sound

Yes

No

(3) complies with the Duty to co-operate

Yes

No

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

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

Parts of the Rainsbrook Valley that fall within Northamptonshire form part of Barby & Onley Parish. The Parish also has borders with parts of the Rainsbrook Valley that is within Warwickshire and falls within Rugby Borough Council.

Barby & Onley Parish Council (BOPC) considers that the protection of the Rainsbrook Valley landscape is highly important and strongly supports Policy EN3 'Rainsbrook Valley Landscape of Elevated Sensitivity' within RBC's plan.

BOPC consider that the proposed designation should be extended to reflect the full geographic extent of the Rainsbrook Valley within Rugby Borough and the assessment of the valley as a whole as a landscape of high sensitivity along with the section of the Rainsbrook Valley within our Parish i.e. within Warwickshire. As development outside the designated area within RBC's plan could adversely impact the setting of the designation and the associated views referred to within EN3.

BOPC would strongly urge RBC & West Northants Council (WNC) to agree a 'common ground & designation' over the entirety of the Rainsbrook Valley and provide 'full EN3' type protection for the whole area and not just the section covered by RBC's policy map.

The Rainsbrook Valley Landscape Sensitivity Assessment, prepared by Node on behalf of Rugby Borough Council makes clear that the Rainsbrook Valley should be understood and evaluated as a coherent landscape system, rather than as a series of unrelated field parcels. It emphasises that landscape value and sensitivity are rarely understood accurately when assessed on a field-by-field basis, because the qualities that give landscapes their character typically arise from their collective form, landform, visibility and experiential qualities. The Assessment demonstrates that the valley functions as a single landscape receptor, meaning that development in one part of the valley inevitably affects the perception and integrity of the

valley as a whole. In its evaluation of landscape value, Node concludes that the Rainsbrook Valley possesses sufficient scenic, recreational and amenity qualities to be regarded as a landscape of “good” value. The Assessment further concludes that:

- the valley exhibits high susceptibility to major housing development, and
- across the majority of the valley, overall landscape sensitivity is high, because the introduction of urbanising forms would be widely visible and would fundamentally alter the existing rural character.

These findings carry considerable weight. They are not the opinions of an objector or promoter but the conclusions of RBC’s own commissioned landscape specialist, prepared as part of the formal evidence base underpinning the Local Plan.

One of our Parish Businesses’, Dunchurch Pools Marina, commissioned INCOLA to provide a Landscape Sensitivity report (March 2026), applying the methodology employed by Node as to assess the remainder of the Rainsbrook Valley that was not assessed within the Node report

Taking the nine ‘value factors’ INCOLA’s report assesses this remainder of the Rainsbrook Valley as follows:

1. Natural Heritage – Moderate Contribution, with ecological designations, priority habitats, higher degree of woodland cover and intact field systems, as confirmed in our Parish’s own NDP.
2. Cultural Heritage – Strong Contribution, with the Oxford Canal, Great Central Railway and areas of intact medieval field systems adding time depth to the landscape.
3. Landscape Condition – Moderate to Strong Contribution, with large areas of intact historic field pattern.
4. Distinctiveness – Moderate to Strong Contribution, with Barby Hill along with intact historic field patterns, Oxford Canal and Great Central Railway all creating a strong sense of place.
5. Recreational – Strong Contribution, with well used public footpaths and long distance trail along with the Oxford Canal, one of the UK’s most used and popular inland waterways, offering significant tourism and recreational facilities.
6. Perceptual (scenic) – Moderate to Strong Contribution, with expansive views across the valley and wider vale from Barby Hill within our Parish.
7. Perceptual (wilderness and tranquillity) – Moderate Contribution, particularly the tranquil space created by the Oxford Canal and views from Barby Hill (within our Parish) across the valley and the wider vale landscape beyond creating a sense of remoteness.
8. Associations – Moderate Contribution, with Rupert Brooke’s poem ‘The Chilterns’ being based on his walks from his home at Hillmorton, along the Oxford Canal and up Barby Hill.
9. Functional – Moderate Contribution, with green and blue corridors, habitats and green infrastructure.

Based on this, the INCOLA report concludes that it is clear the remainder of the Rainsbrook Valley is also of a High Landscape Sensitivity
BOPC encourage RBC to reach a ‘common understanding & designation’ with WNC for the Valley as a whole.

(Continue on a separate sheet /expand box if necessary)

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

Statement to include that RBC will work with West Northants Council to agree a statement of common ground over RBC's policy ENV3 ie to define & protect the Rainsbrook Valley as an area of Landscape Sensitivity within both Warwickshire & Northamptonshire

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

Name or Organisation: BARBY & ONLEY PARISH COUNCIL

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	Site 73 Lodge Farm				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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

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

Barby & Onley Parish Council (BOPC) submits that the Rugby Borough Council's decision not to allocate Lodge Farm in the submitted Local Plan is correct and fully supported by the available evidence. BOPC strongly objects to any proposal whether advanced through third-party representations, promoted modifications, or Main Modifications during the examination process to reintroduce or allocate Lodge Farm within the Plan. BOPC's representation is not a generalised objection to development or growth within Rugby Borough. Rather, it is a technical submission addressing the statutory tests of legal compliance and soundness, with particular regard to:

10. the proper interpretation of Rugby Borough Council's own evidence base;
11. the consistency of the submitted Plan with the conclusions of that evidence;
12. the continuing material weight of the previous Local Plan Inspector's findings concerning Lodge Farm

(Continue on a separate sheet /expand box if necessary)

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Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	Site 40 Land east of Kilsby Road Site 334 Land off Barby Lane				

4. Do you consider the Local Plan:

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As a bordering Parish, Barby & Onley Parish Council (BOPC), fully support the exclusion of the above two sites (in Hillmorton) in Rugby Borough Council's Local Plan due to the impact that these developments would have upon our Parish and our Parishioners and the damage this would do the Rainsbrook Valley. As set out in our response to regulation 18, views within the Rainsbrook Valley are protected within our NDP.

As a Parish that borders both the Rainsbrook Valley within Warwickshire and includes sections of the Rainsbrook Valley that is within Northamptonshire we would urge Rugby Borough Council to undertake consultation and collaboration with West Northamptonshire Council to reach a 'common understanding' on the protection of the Rainsbrook Valley as a whole. The Rainsbrook Valley as a whole requires protection as given to the Warwickshire section under ENV3 within RBC's proposals and this needs to be extended to the Rainsbrook valley as a whole irrespective of County boarder

(Continue on a separate sheet /expand box if necessary)

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(Continue on a separate sheet /expand box if necessary)

(Continue on a separate sheet /expand box if necessary)

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. If you have used AI to produce or substantially alter your representation, please declare which tool you have used, how it was used, and what checks you have undertaken to ensure the AI-produced material is accurate.

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

The Rugby Borough Council Privacy Notice for Development Strategy is available here: <https://www.rugby.gov.uk/w/privacy#development-strategy>

The Planning Inspectorate's privacy notice can be accessed here: <https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices>