

To: Rugby Borough Council – Local Plan Regulation 19 Consultation

Subject: Representation regarding Lodge Farm / Site 73

I am writing as a local resident to object to any proposal that seeks to allocate Lodge Farm (Site 73) within the Local Plan.

The Council's own evidence base raises serious concerns about the transport impacts and deliverability of the site. The Sustainability Appraisal identifies transport as a "major issue" and highlights that the infrastructure required to make the site function would be extremely substantial. The evidence also indicates that the achievability, suitability and viability of the proposed transport interventions remain highly questionable.

In addition, the infrastructure burden associated with Lodge Farm appears exceptional. The site is divided by the A45, which is a strategic highway corridor rather than a local road capable of acting as a settlement spine. Integrating development across this route would require significant engineering interventions and additional highway infrastructure, adding further cost and complexity to an already challenging scheme.

The Council's own appraisal also notes that the site is "a long way from being a viable proposition even at 0% affordable housing". This raises fundamental concerns regarding whether the development could realistically deliver the infrastructure, transport mitigation, schools and affordable housing that would normally be expected from a strategic allocation.

Given these factors, it is difficult to see how Lodge Farm could satisfy the "effective" test of soundness in the National Planning Policy Framework. Strategic allocations should be deliverable within the plan period and supported by credible infrastructure provision. The current evidence suggests that Lodge Farm would struggle to meet

that requirement.

I therefore support the Council's decision not to allocate Lodge Farm within the submitted Local Plan and respectfully ask that the Inspector reject any proposal that seeks to introduce the site during the examination process.

Name: Conor Benton



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I am writing as a resident to object to the allocation of Lodge Farm due to the likely impact on Dunchurch and surrounding communities.

The Council's own evidence acknowledges that even with mitigation measures, major concerns remain regarding how traffic associated with Lodge Farm could avoid passing through Dunchurch. This is a significant issue because Dunchurch is a historic village with limited road capacity and already experiences congestion and traffic pressure.

Introducing a large new settlement nearby would inevitably increase traffic movement along the same corridors currently serving the village. This raises concerns not only about congestion but also about rat-running, road safety, noise and the erosion of the village environment.

Dunchurch is not simply a transport node. It is an established historic settlement with a distinct character and heritage setting. Increased traffic flows and infrastructure pressure would affect the amenity, tranquillity and identity of the village.

The Local Plan already identifies South West Rugby as the main strategic growth location for this part of the borough. That allocation will already generate significant infrastructure and traffic impacts in the wider area. Adding another large strategic site at Lodge Farm risks concentrating excessive growth within the same corridor.

For these reasons, I support the Council's decision not to allocate Lodge Farm. The Plan strategy can clearly be delivered without this site, and avoiding unnecessary pressure on Dunchurch represents a

more balanced and sustainable approach to development.

Name: Conor Benton



To: Rugby Borough Council – Local Plan Regulation 19 Consultation

Subject: Representation regarding Lodge Farm / Site 73

I am writing to object to any proposal to allocate Lodge Farm due to the potential harm to the Rainsbrook Valley landscape.

The Council's own Landscape Sensitivity Assessment identifies the Rainsbrook Valley as a coherent landscape of good value with high sensitivity to major housing development. The evidence explains that the valley functions as a single landscape system, meaning that development in one part of the valley affects the character and perception of the entire landscape.

The assessment also explains that the valley is widely experienced as a distinct rural landscape. Due to the local topography, much of the existing urban edge of Rugby is visually concealed from many viewpoints within the valley. As a result, large-scale residential development would appear highly prominent and would introduce urbanising forms into a landscape currently experienced as open countryside.

Importantly, the Council's own post-mitigation landscape testing concluded that even after extensive mitigation measures – including additional planting, green infrastructure and open space – significant landscape effects would remain. These include impacts on views from public footpaths, the Oxford Canal Walk and surrounding elevated land.

This demonstrates that the landscape harm associated with Lodge Farm is not simply a matter of design detail. It arises from the scale and location of the development itself.

For these reasons, I support the Council's decision not to allocate Lodge Farm and believe that Policy EN3 protecting the Rainsbrook

Valley landscape should be strengthened to ensure the valley and its setting are properly safeguarded.

Name: Conor Benton

