

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="Dawn"/>	<input type="text"/>
Last Name	<input type="text" value="Cotton"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<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)	<input type="text" value=""/>	<input type="text"/>

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

Name or Organisation:

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	<input type="text"/>				

4. Do you consider the Local Plan:

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

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.

(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.

(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-notice>

To: Rugby Borough Council – Local Plan Regulation 19
Consultation

Subject: Representation regarding Policy EN3 Rainsbrook
Valley landscape of elevated sensitivity & Lodge Farm Site 73
of the local plan.

We are writing as residents concerning two items we wish to
object to the allocation of Lodge Farm due to the likely impact
on Dunchurch and surrounding communities.

And feel the extension to the protection of the Rainsbrook
Valley is vital, ensuring this part of Rugby is protected for the
future generations to come m.

Policy EN3 - Rainsbrook Valley Landscape of Elevated Sensitivity

The protection of the Rainsbrook Valley landscape is
considered highly important and is strongly supported. Policy
EN3 'Rainsbrook Valley Landscape of Elevated Sensitivity' is,
therefore, welcomed but we feel should be enhanced in two
key regards:

- 1/ The proposed designation should be extended to
reflect the full geographic extent of the Rainsbrook Valley
within Rugby Borough and the assessment of the whole
valley as of high landscape sensitivity.
- 2/ Consideration should be given to development outside
the designated area that could adversely impact the setting
of the designation and the associated views.

These changes are needed to ensure the effectiveness of the
policy designation, recognising that the purpose of the policy is

to **protect the Rainsbrook Valley**, and extent of the proposed designation should reflect the Valley as a whole.

Extent of Designated Area

Warwickshire County Council's landscape sensitivity study, on behalf of Rugby Borough Council - 2017, concluded that the whole northern escarpment of the Rainsbrook Valley was Highly Sensitive and 'inappropriate for development'. To reflect this, it is suggested that the proposed EN3 designation area should be extended to the south-west, to include Toft Hill.

Node's landscape sensitivity assessment, on behalf of Rugby Borough Council – December 2025, concluded that the portion of the Rainsbrook Valley assessed was of High sensitivity when a development of 50+ houses was considered. The proposed EN3 designation does not fully reflect the Rainsbrook Valley area, within Rugby Borough, assessed by Node as of High sensitivity. The proposed designation area should, therefore, be extended to the south to correct this.

INCOLA's landscape sensitivity assessment, applies the methodology employed by Node so as to assess the remainder of the Rainsbrook Valley that was not assessed by Node, a serious omission. This is the area of the valley south to a line from Toft Hill to Barby Hill with the promontories and tributaries at the transition with the vale beyond, see attached study area plan.

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.

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. The valley here also providing a key contribution to the setting of and arrival to Dunchurch.

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, and resources such as Dunchurch Pools Marina offering significant tourism and recreational facilities.

6/ Perceptual (scenic) – Moderate to Strong Contribution, with expansive views across the valley and wider vale from Barby and Toft Hills.

7/ Perceptual (wilderness and tranquillity) – Moderate Contribution, particularly the tranquil space created by the Oxford Canal and views from Barby Hill 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.

In conclusion, the proposed designation does not encompass the full geographic area of the Rainsbrook Valley, assessed across three material reports as of High Landscape Sensitivity. The EN3 designation area should, therefore, be extended to address this, see attached plan.

Adverse Impact of Proximate Development

The three landscape studies of the Rainsbrook Valley, detailed above, all assess the landscape as of High Sensitivity. The assessments include the influence of views beyond the valley confines, especially of the rural vale to the south west. We believe the potential adverse impact of development outside the designated area on the designation should be material in the consideration of the planning balance.

We would, therefore, propose the following modification to Policy EN3 Criteria A;

'A Within the Rainsbrook Valley landscape of elevated sensitivity as defined on the policies map, development should comply with paragraphs B to E of this policy. Where development would be located outside of, but would influence the designated area, consideration should be given to ensuring that any adverse impacts of development on the landscape are avoided.

Lodge Farm Site 73 within the local plan

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.

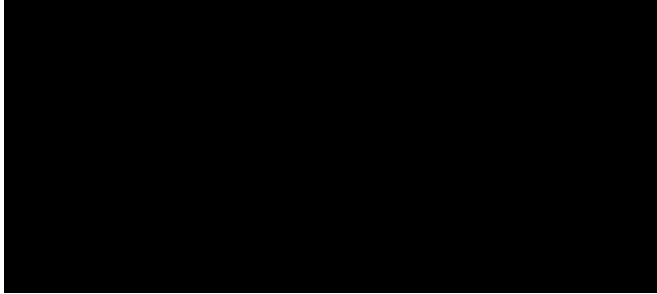
For these reasons, I support the Council's decision not to allocate Lodge Farm. The Plan strategy can clearly be delivered without this site, and avoiding unnecessary pressure on Dunchurch represents a more balanced and sustainable approach to development.

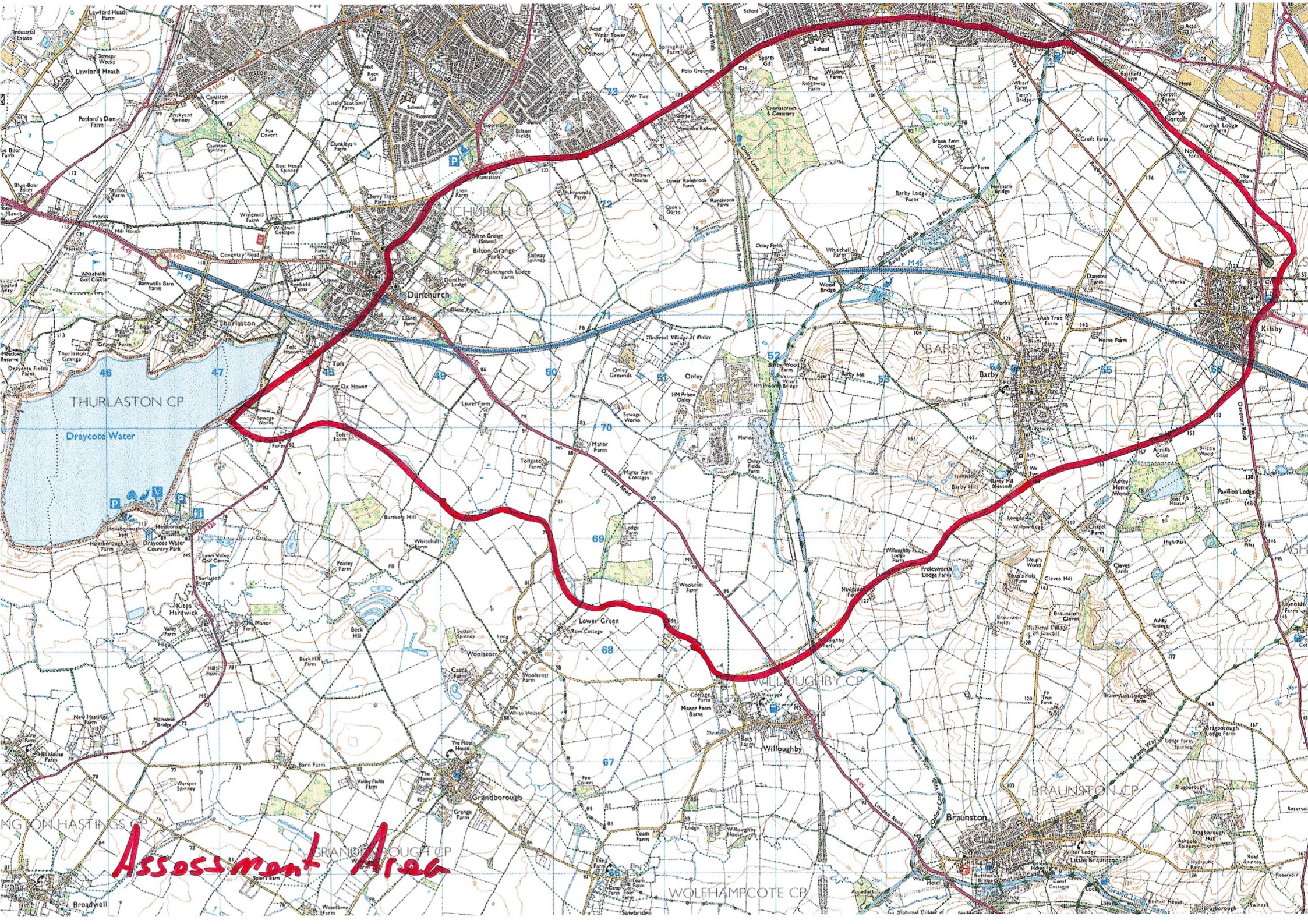
Name: Mr Stephen & Mrs Dawn Cotton

Address: 69 Onley Park, Nr Willoughby, Rugby, Warwickshire, CV23 8AW.

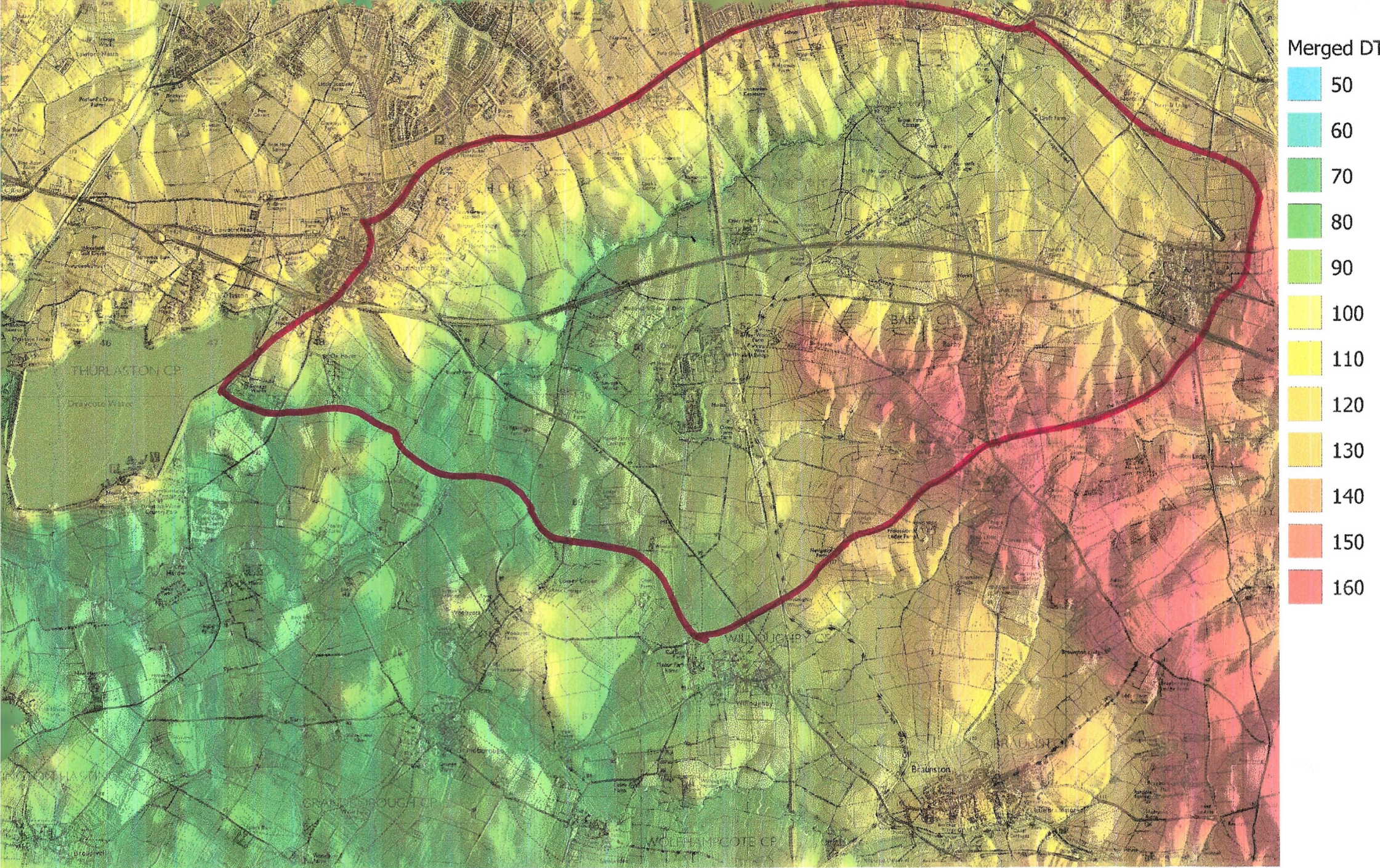
Date: 08 March 2026

Signature: Mrs Dawn Cotton & Mr Stephen Cotton





Assessment Area



Assessment Area

