

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.*

Title

First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

2. Agent's Details (if applicable)

E-mail Address
(where relevant)

sophie@pmvplanning.com

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?

Paragraph

Policy

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.

Please see supporting representations

(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.

Please see supporting representations

(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 refer to supporting representations

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.

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>

Landscape Expert Opinion and Advice Note

Landscape Evaluation of the Rainsbrook Sensitivity Assessment (with particular reference to land to the east of Dunchurch)

19th February 2026

Introduction

1. This Landscape Advice Note has been prepared by Cassandra Wheadon, Associate Director of Landscape and Townscape at Turley, on behalf of Signature Hotel Group ('the client'), to provide an independent professional opinion on landscape matters in relation to the Rainsbrook Valley Landscape Sensitivity Assessment prepared by Node. This sensitivity assessment was prepared on behalf of Rugby Borough Council in support of the Local Plan (Regulation 19) consultation (March 2026). The review considers in particular the methodology used to assess landscape sensitivity across the Rainsbrook Valley and the settlements of Dunchurch and Rugby, and examines how the client's Site has been appraised relative to other land parcels within the Rainsbrook Valley study area.
2. The Council's assessment methodology is based on professional guidance, including the Guidelines for Landscape and Visual Impact Assessment (GLVIA3), relevant guidance published by Natural England (2014 and 2019), and Technical Notes issued by the Landscape Institute (including 02/21, 06/19 and 01/20). This alignment with recognised good practice demonstrates awareness of current professional standards. The structured separation of baseline conditions, landscape value, susceptibility to change and overall sensitivity is consistent with the guidance and is a recognised and accepted landscape assessment methodology. However, the report does not define the purpose and scope of the sensitivity assessment (as recommended as best practice in 'An approach to landscape sensitivity assessment – to inform spatial planning and land management' Natural England 2019). The development scenarios informing the landscape sensitivity assessment are outlined within the susceptibility section 4.4. However, their late placement in the document limits the overall clarity and transparency of the assessment. In addition, given the nature of this assessment of such a large swathe of land across a valley, there are a number of issues in the application of the methodology that warrant closer examination.
3. It is notable that a number of land parcels on the northern edge of the study area, adjacent to Hillmorton, are identified within the Council's assessment as being of High - Medium sensitivity and therefore less sensitive than the remaining valley. These parcels occupy a comparable edge of settlement context and share similar physical and visual characteristics with the client's Site (**Figure 1**), including their relationship to existing built form, settlement pattern and the transitional nature of the urban to rural interface. As such, they provide comparable areas for considering the consistency and proportionality of the sensitivity judgements applied across the study area. A review of these areas alongside the client's Site assists in determining whether the client's land warrants a comparable sensitivity rating.



Figure 1: Client's land (The Site) outlined in red

4. This Advice Note has been informed by a desktop appraisal of relevant documents and a site visit (undertaken in February 2026) which included visiting the study area reviewed in the sensitivity assessment as well as client's land to the east of Dunchurch.

Rainsbrook Valley Landscape Sensitivity Assessment Methodology

Approach to the study area/ valley wide assessment

5. Whilst the Landscape Sensitivity Assessment methodology explains that the Rainsbrook Valley has been assessed "as a whole", consistent with guidance from the Landscape Institute that landscape value is rarely appreciated on a field-by-field basis, there is a risk that this principle has been applied at too broad a spatial scale, and differs from the approach taken in the 2016 Landscape Sensitivity Study, which identifies 'Landscape Description Units' / 'Land Cover Parcels'. Seemingly, GLVIA and associated Technical Notes have been confused with the guidance within GLVIA which differs to the Natural England guidance that offers a more generic process to inform strategic spatial and land management. Although it is appropriate to understand the valley as a coherent area and character, sensitivity in landscape planning terms must ultimately relate to the specific landscape receptor, the specific site, and the specific form of development proposed. None of these are clearly defined within the purpose and scope of the sensitivity assessment.
6. The assessment does not divide the valley into character sub-areas, or distinguish between core valley landform and transitional edge of settlement parcels, therefore there is potential for the landscape sensitivity of the area to be averaged out; some areas of high sensitivity being underplayed and vice versa. In such circumstances, areas that strongly express the defining characteristics of the valley (for example, intact valley slopes, open rural stretches or areas with pronounced perceptual qualities) may elevate the sensitivity rating of parcels that are materially

different in character and influence. This risks conflating high - quality, relatively unaltered landscape with land that is already influenced by built form, infrastructure or urban edge conditions.

7. Therefore, parts of the Rainsbrook Valley may justifiably be of high sensitivity, but that sensitivity is not necessarily uniform across the study area. Where a parcel is located on the settlement edge, influenced by adjoining development, or does not contribute to the valley's most distinctive landform or perceptual attributes, it may not reasonably be regarded as representative of the valley's most sensitive characteristics.
8. Accordingly, when considered alongside susceptibility, the judgements are not presented a clear and transparent manner.

Differentiation between designated and non-designated land

9. The methodology correctly states that designation does not automatically equate to high susceptibility. That position is consistent with established guidance and reflects the principle that sensitivity must be derived from the characteristics of the landscape receptor and its ability to accommodate change, rather than from designation status alone. The fact that land is not designated does not prevent it from being valued, but any attribution of elevated value must be supported by clear, site-specific evidence.
10. In this case, the Site is not located within a nationally designated landscape, nor within a Conservation Area or Registered Park and Garden. It lies adjacent to a Registered Park and Garden (RPG) and a Conservation Area, but adjacency is not the same as functional or perceptual contribution. It is important to understand if the Site makes a demonstrable contribution to the significance, setting or special qualities of those heritage assets, or whether it simply forms part of their wider landscape context.
11. The assessment appears to extend a valley-wide judgement of value and rely on proximity to heritage designations, risking conflation between contextual association and demonstrable contribution to significance. Under the 2019 guidance published by Natural England on landscape sensitivity assessment, value attribution should be evidence-based and explicitly linked to demonstrable characteristics such as natural heritage interest, cultural associations, perceptual qualities, condition and distinctiveness. It is not sufficient to assume elevated value by virtue of being near a designated asset; the contribution must be articulated and proportionate.
12. In particular, where land is outside a Conservation Area and outside the boundary of a Registered Park and Garden, the assessment should distinguish between:
 - land that makes a meaningful contribution to the significance or appreciation of those assets (for example, forming part of designed views, historic approach routes, or key setting attributes); and
 - land that is visually or functionally separate, influenced by modern development, or not identified in heritage evidence as contributing to significance.
13. There is a potential that the valley-wide character value, combined with proximity to heritage designations, has been applied in a generalised manner, without sufficient interrogation of sub -

areas and their actual contribution. It would be reasonable to conclude that value reflects physical, perceptual and functional characteristics, rather than an assumed extension of adjacent designations.

14. Observations from our site visit in February 2026, found that there is little intervisibility between the Site and the RPG. It is anticipated that further scrutiny in regards to the local landscape's role in the setting to the RPG would be carried out at application stage, and that an overly cautious approach has been taken in the Sensitivity Assessment, to those fields within proximity.

Susceptibility to change dependent on the type of development proposed

15. The Council's methodology correctly recognises that susceptibility is proposal-dependent. This reflects the position set out in the Guidelines for Landscape and Visual Impact Assessment (GLVIA3), which defines susceptibility as the ability of a landscape receptor to accommodate a particular form of development without undue consequences for its baseline character or the achievement of landscape policy objectives. Susceptibility is therefore not an abstract or fixed attribute of land; it must be assessed in relation to the specific nature, scale and parameters of development being contemplated.
16. The Rainsbrook Valley assessment has considered susceptibility in broad terms, as '*residential-led schemes of 50+ dwellings, aligned with the 'major residential development' category of the May 2025 'Reforming Site Thresholds' working paper from MHCLG*' without articulating any assumptions regarding height, density, layout, landform response, or embedded mitigation, there is a risk that susceptibility has been assessed on a worst-case or generic basis. In the absence of clear development parameters, it becomes difficult to meaningfully test the extent to which change would occur, how visible it would be, and whether it would materially conflict with the defining characteristics of the landscape. This can lead to an inflated susceptibility judgement, particularly in edge of settlement contexts where outcomes can vary significantly depending on design and approach to masterplanning and mitigation.
17. In the case of the client's Site, susceptibility should properly be considered in light of a scheme that would reinforce the existing settlement edge rather than projecting isolated development into open countryside; avoids prominent ridgelines or skyline intrusion; retains and strengthens existing hedgerow structure and landscape features; and maintains the openness and legibility of the wider valley floor. Where development is informed by landform, responds to existing urban morphology and incorporates structural planting and green infrastructure from the outset, the resulting landscape change may be contained, filtered and assimilated within the existing context.
18. On that basis, the susceptibility to change should propose embedded mitigation strategies and / or consider whether a Site or sub - area can accommodate a landscape-led scheme of defined parameters, without undue consequences for the character of the valley. When susceptibility is properly aligned to a specific and proportionate development scenario, it may reasonably be concluded that the Site has a greater capacity to accommodate change than would be implied by a generic scheme and sensitivity assessment.

Edge of settlement Sites

19. In considering the spatial application of the sensitivity judgement, it is important to recognise the Site’s specific context on the edge of Dunchurch. The Site lies immediately adjacent to existing built form and is visually experienced in association with the settlement rather than as part of the undeveloped core of the Rainsbrook Valley. Where land is read as part of the settlement fringe, particularly where it is influenced by nearby housing (existing and under construction), infrastructure (A45/ B4459 and the M42), lighting or movement; its character is typically transitional in nature, forming part of the urban rural interface rather than the intact valley landscape.
20. Furthermore, the Site is physically or visually separated from the core valley landform by intervening topography, vegetation belts, hedgerows or tree cover, its functional and perceptual relationship with the wider valley may be more limited than suggested by a broad character-area designation. The Site does not wholly contribute to the most sensitive attributes of the valley, such as expansive rural openness, pronounced landform, or areas of heightened tranquillity.
21. Transitional landscapes of this kind often exhibit mixed characteristics: partial urban influence combined with residual rural features. Within established assessment practice, such areas frequently align more closely with “Ordinary” landscape value, reflecting their commonplace typology and edge-of-settlement context, and “Medium” susceptibility, acknowledging that change would occur but within a landscape already influenced by development. On that basis, it would be reasonable to conclude that the Site’s sensitivity should be considered in light of its fringe location and transitional character, rather than being equated with the higher sensitivity that may apply to more intact and representative parts of the Rainsbrook Valley.

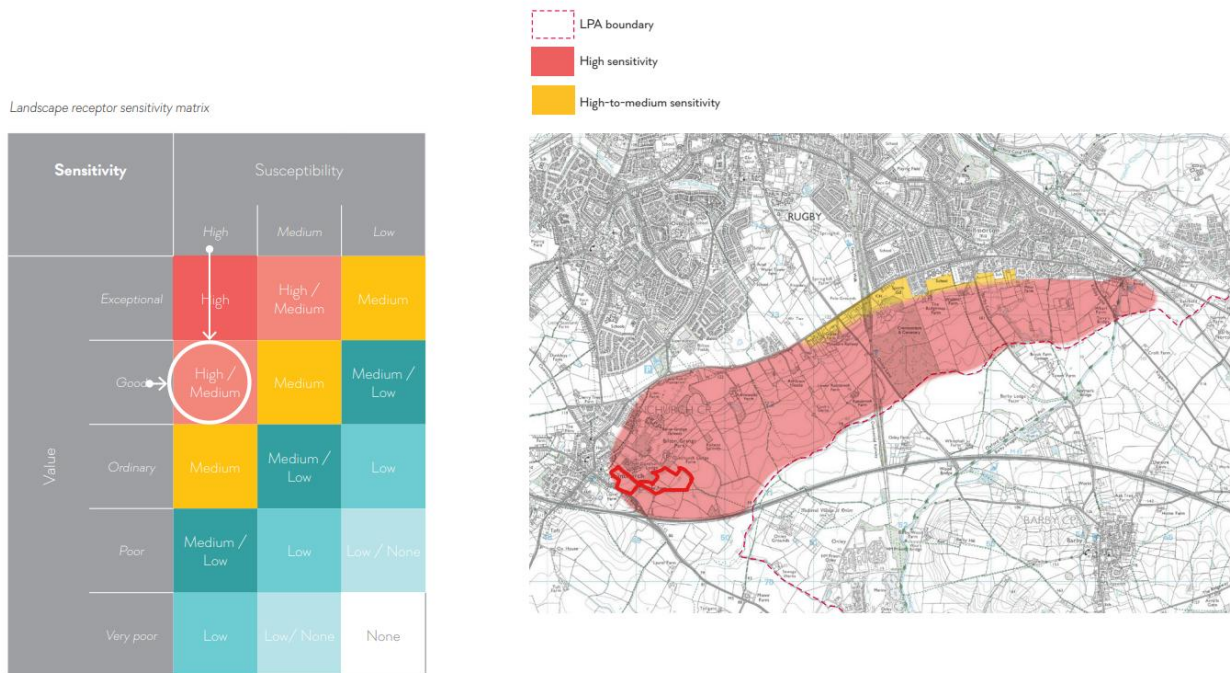


Figure 2: Extract from the Rainsbrook Valley Landscape Sensitivity Assessment prepared by Node, the client’s Site is out lined in Red

Comparison of High and High - Medium Sensitivity Sites in the assessment

22. A review of the spatial distribution of sensitivity ratings within the Rainsbrook Valley study area indicates a pattern in the location of parcels identified as **High sensitivity (red)**. These areas are generally situated within the more exposed parts of the valley floor or on elevated valley sides and higher ground where there is limited physical or visual containment. They typically display stronger expression of valley landform, pronounced openness, longer-distance intervisibility and limited association with existing built form. In such locations, development would be more readily perceptible and more likely to affect the defining characteristics of the valley, such that a High sensitivity judgement may be justified.
23. By contrast, parcels identified as **High - Medium sensitivity (yellow)** are predominantly located on the edge of Rugby. These areas are more closely related to existing settlement form and frequently benefit from vegetation structure, field boundaries and adjoining development which provide visual filtering and containment. They exhibit transitional characteristics associated with the urban to rural interface and are experienced in association with the settlement edge rather than as part of the intact or undeveloped core of the valley landscape.
24. I additionally highlight the inconsistency in the way colour is used and described. The plan shows areas shaded in yellow, which the sensitivity matrix defines as “medium.” However, on the plan itself, this same colour is described in the key/ legend as “high-medium.” This creates confusion, and if stakeholders are unclear as to whether a parcel is being assessed as medium or high-medium sensitivity, this could materially affect how the findings are understood and relied upon. The terminology and colour references should therefore be reviewed and standardised to avoid ambiguity.
25. The Site shares similar characteristics with these **High – Medium sensitivity** parcels. It lies immediately adjacent to the built form of Dunchurch and is visually and functionally experienced as part of the settlement fringe. The Site is enclosed in part by established hedgerows and tree belts, which provide a degree of containment and filter views both into and out of the land. It does not occupy elevated or skyline positions and does not form part of the most exposed or visually prominent valley slopes identified elsewhere in the study area.



Figure 3: Panoramic view from the south of the Site, on the other side of the Valley looking towards the Site and the exposed areas of the open valley (high sensitivity) and the more contained areas (less sensitive)

26. Furthermore, the character of the Site and its immediate setting has been influenced by recently constructed development to the south-west of Dunchurch. This development has altered the

baseline context of the Site, reinforcing its transitional urban rural character and reducing its perceptual association with the wider undeveloped valley. In this respect, the Site aligns more closely with edge-of-settlement parcels adjoining Rugby that are identified as **High - Medium sensitivity**, rather than with the more open and intact areas of High sensitivity.



Figure 4: View from the roundabout on the A45/ B4459 and the M42 looking north towards Dunchurch, newly constructed development visible in the foreground, glimpses views of the Site visible in the middle distance.

27. It is acknowledged that there are partial views across one of the Site's field parcels towards the church tower of St Peters Church within Dunchurch village centre. The church tower forms a recognisable local landmark and contributes positively to the character and legibility of the settlement. However, the presence of intervisibility does not in itself indicate that the Site forms a critical component of the church's setting. The views are experienced within a context already influenced by settlement edge development and vegetation structure, and do not appear to constitute a designed vista, historic approach or formally recognised heritage view.



Figure 5: View from a public right of way through the Site looking north towards Dunchurch, newly constructed development and the St Peters Church tower (located in the village) visible in the distance.

28. The Site also lies adjacent to designated heritage assets, including the Conservation Area and Registered Park and Garden. While proximity to such assets can contribute to landscape value where land demonstrably forms part of their significance or appreciation, adjacency alone does not equate to high sensitivity. The assessment should distinguish between land that makes a meaningful and necessary contribution to the significance of heritage assets and land that simply forms part of their wider context.
29. Furthermore, where adjacent factors are considered to elevate landscape value, this does not automatically preclude development. Embedded mitigation strategies; such as sensitive layout, retention of key views, structural planting, appropriate boundary treatments, and careful design of scale and massing, can be used to ensure that development responds positively to heritage setting. In this way, proposals can be designed to conserve, and potentially enhance, the appreciation of nearby heritage assets, rather than being treated as inherently incompatible by virtue of proximity alone.
30. It is also notable that other parcels within the study area accommodating recreational or sporting uses, which themselves contribute to openness, community value and landscape character, have not consistently been attributed equivalent levels of sensitivity. This suggests that the weighting applied to proximity to heritage designations in the case of the Site is unproportionate when compared with other forms of landscape value recognised elsewhere in the assessment.



Figure 6: View looking south from an exposed area of sports recreation land on the valley sides that has been identified in the Rugby Sensitivity Assessment as having less sensitivity than that of the Site.

31. When considered in comparative terms, the defining characteristics of the High sensitivity (red) parcels; namely exposure, elevation, strong valley expression and limited containment are not materially reflected in the client's Site. Instead, the Site exhibits containment, urban influence and transitional edge-of-settlement characteristics comparable to parcels identified as **High - Medium sensitivity** (yellow).

Summary and Conclusions

32. In summary, there are a number of weaknesses in the approach taken within the Rainsbrook Valley Landscape Sensitivity Assessment. These include:
 - The application of a valley-wide assessment without sufficient subdivision into character sub-areas, resulting in a broad-brush sensitivity judgement that does not adequately reflect localised variations in character, condition and context;
 - The potential conflation of proximity to heritage designations with demonstrable contribution to their significance, leading to an elevated attribution of landscape value without clear, site-specific evidence;

- The assessment of susceptibility in generic terms, without reference to defined development parameters, resulting in a worst-case or undefined scenario influencing the overall sensitivity judgement;
 - Limited differentiation between intact core valley landscapes and transitional edge-of-settlement parcels influenced by existing built form, infrastructure and recent development; and
 - Inconsistencies in the comparative application of sensitivity ratings across the study area, particularly when considering parcels adjoining Rugby that display similar characteristics to the client's Site but are identified as High–Medium sensitivity.
33. As a consequence of the above weaknesses, the sensitivity judgement applied to the client's Site is not robustly evidenced and does not appear to reflect a consistent or proportionate application of the Council's stated methodology.
34. The analysis set out in this Note, informed by a site visit and review of the assessment documentation, demonstrates that the Site does not exhibit the defining characteristics associated with the High sensitivity parcels within the valley, such as pronounced exposure, strong expression of valley landform or limited containment. Instead, the Site is physically and visually associated with the edge of Dunchurch, exhibits a transitional urban–rural character, and benefits from existing vegetation structure and containment comparable to parcels identified elsewhere in the study area as High–Medium sensitivity.

Contact

Cassandra Wheadon



05063_HTAL

Rugby Borough Council
Planning Department
Civic Centre
Rugby

13 March 2026

Dear Rugby Policy Team,

REG 19 REPRESENTATIONS

On behalf of our client, Dunchurch Park Estates Limited (formerly Signature Hotel Group Limited), we submit representations to the Proposed Submission Local Plan Consultation of the Rugby Borough Local Plan 2025-2042 (January 2026).

We build upon representations made to the last round of the Local Plan consultation (Reg 18) and trust that these comments and the original comments will be considered collectively as the plan moves forward.

These representations focus solely on the very late addition of new **Policy EN3** and the LPA's late reliance on evidence in support of this policy which was only prepared in December 2025.

Whilst we recognise that the LPA are within their powers to introduce new policies underpinned by new evidence at the Regulation 19 stage, we consider that the introduction of Policy EN3 and its supporting evidence at this extremely late stage does not allow sufficient and fair opportunity for engagement and review by all.

The Rugby Borough Council Statement of Community Involvement (2026) sets out at Table 1, the minimum requirements for the duration of public consultation. It is disappointing that the Council are seeking to bring forward a new Local Plan utilising minimum requirements of six weeks for public consultation. The significant gaps between Reg 18 and Reg 19, along with the wealth of new evidence, change in direction of policy and introduction of new policy, teamed with minimum public consultation requirements, strikes of a borough who are not invested in engagement but solely preoccupied with the submission of the Local Plan. This seems entirely unfair given the wealth of the evidence brought forwards and the policy implications. This seems unnecessarily rushed and prejudicial towards achieving meaningful engagement with the local community and key stakeholders.

In relation to the preparation of evidence to underpin the policies of the Local Plan, guidance within the Planning Advisory Services issues that LPA should engage early with local communities. It feels that policy ENV3 is being shoe-horned into a submission draft without the due engagement and following proper process. If

nothing else, we request that the LPA reconsider their consultation and engagement strategies going forwards. Given the quantity of the information prepared in evidence to support policy EN3, we respectfully request that an extension to the consultation period is allowed to facilitate a full and fair review of the document.

A regulation 19 consultation is the final formal stage of public engagement before it is submitted to the Secretary of State for independent examination. Therefore, the LPA suggests that comments should be limited to submissions on the legal compliance and ultimate soundness of the plan. However, given that elements such as policy ENV3 are a completely new addition to the plan, and have not been part of any previous consultation it is completely unfair that any comments be restricted to legal compliance. Indeed, given the volume of new evidence, we would suggest that the LPA should not have proceeded with a Regulation 19 and should have reverted to a Regulation 18 consultation to give this evidence a full review. We will therefore be making a comment on Policy ENV3 and supporting evidence as if this is a Regulation 18 and not restricted to Reg 19 'soundness tests' only.

In addition, we request that we are invited to attend the relevant session at the Examination in Public 'EIP' should the Submission version of the plan be submitted with no further iterations or amendments following this consultation.

We seek to make representations on the following elements:

- Policy EN3 Rainsbrook Valley landscape of elevated sensitivity
- Rainsbrook Valley Landscape of elevated Sensitivity Assessment (December 2025)

Policy ENV3- Rainsbrook Valley landscape of elevated sensitivity

The Regulation 19 consultation document includes the following policy:

Policy ENV3- Rainsbrook Valley landscape of elevated sensitivity

- A. *Within the Rainsbrook Valley landscape of elevated sensitivity as defined on the policies map, development shall comply with paragraphs of B to E of this policy.*
- B. *Protect, reinforce and where possible enhance the landscape character taking into consideration the following landscape factors:*
 - i) *Natural heritage*
 - ii) *Cultural heritage*
 - iii) *Landscape condition*
 - iv) *Associations*

- v) *Distinctiveness*
- vi) *Recreational value*
- vii) *Perceptual scenic and tranquility qualities*
- viii) *Functional landscape qualities*

c) safeguard important view within and across the Rainsbrook Valley and minimise adverse visual impacts on the edge escarpment

D. Protect and where possible enhance the landscape and setting of 'Bilton Grange' and 'Dunchurch Lodge' registered park and gardens, Rugby Diamond Jubilee Wood Country Park and Rainsbrook Cemetery and Crematorium.

E) Protect and where possible enhance the natural heritage connectivity and recreational value of Great Central Walk, the Oxford Canal, and the Public Rights of Way network.

The supporting text to this policy states:

5.7 The Rainsbrook Valley is designated as a landscape of elevated sensitivity. The findings of the Rainsbrook Valley Landscape Sensitivity Assessment (2025) justify affording this area a higher degree consideration in decision making.

The Rainsbrook Valley has been entirely whitewashed for high sensitivity within the supporting assessment by Node. In reality this means that land, that has for decades had no recognised value by the LPA, suddenly been whitewashed and elevated for landscape value. The LPA have at no junction provided any justification for the sudden inclusion of the Rainsbrook Valley landscape at this late stage in the plan making process. This is therefore the first time that land is now being identified as having a higher degree of consideration in decision making. It seems that post Reg 18, the LPA has for some reason substantially rewritten and refocused the aspiration of the policy.

The policy designation is not consistent with the presumption in favour of sustainable development under the currently adopted National Planning Policy Framework (2024). Plans should provide a positive vision for each area, and address social and environmental priorities in line with Para 8, 9 and 10 of the NPPF.

Para 11 further explores the principle of sustainable development demonstrates that for plan making that "plans should promote sustainable pattern of development".

Para 16 of the NPPF notes that Plans should be prepared with the objective of contributing to the achievement of sustainable development.

Para 187 of the NPPF further illustrates that planning policies should contribute to and enhance the natural and local environment by:

- a) Protecting and enhancing valued landscape (in a manner commensurate with the identified quality in the development plan).

In addition Para 188 sets out that plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value.

The broadbrush application of a high sensitivity landscape across the Rainsbrook Valley and then the application of the proposed draft ENV3 is therefore in contradiction to these policies.

In any case, the entire local plan process is due to undergo significant change, with the proposals being brought forward under the Levelling Up and Regeneration Act 2023. These reforms are to revise the plan led process for local authorities, and it therefore seems premature for the LPA to submit the Local Plan at this late stage, just to get ahead of the 'last date' for submission in December 2026.

Adoption ahead of the new plan process is premature and inconsistent with the reforms. In addition the new NPPF, which is anticipated in the next few weeks, and in any case before the adoption of this Local Plan, will further make the policy position of the Local Plan out-of-date. It would not be sensible for the LPA to continue to pursue their local plan ahead of the reforms to the Local Plan preparation and the updated NPPF (2026).

The whitewashing of land to sit within the Rainsbrook Sensitivity Zone, without proper evidence, sterilises a large area of land which would otherwise be unrestricted in policy terms (i.e no other landscape designations such as Green Belt or AONB) within a local authority who have an evidenced housing need. Indeed, as of late 2025, Rugby Borough Council can only demonstrate a 4.16 year housing delivery.

We are concerned with the late inclusion and whitewashed nature of the sensitivity level across the Rainsbrook Valley and took it upon ourselves to engage Turley Landscape to undertake an independent professional review of the Rainsbrook Valley Landscape Sensitivity Assessment as prepared by Node on behalf of Rugby Borough Council. The review considers the methodology used, with particular focus on the inclusion of land owned by our client and evaluates whether the assessment has fairly judged the sensitivity of the landscape included here. This document has been attached for reference, and I trust its findings and conclusions will be fully reviewed by the LPA during this consultation.

In essence the key findings include:

- The Council's methodology generally follows recognised guidance (such as GLVIA3 and Natural England guidance) but lacks clarity about the purpose, scope, and development assumptions used in the assessment.

- The study assesses the entire Rainsbrook Valley too broadly, without dividing it into smaller character areas. This may overgeneralise sensitivity levels and fail to reflect local differences.
- The report may overstate landscape value by linking it to proximity to heritage assets (like a Conservation Area or Registered Park and Garden) without clear evidence that the site contributes to their significance.
- Development assumptions are vague, using a generic “50+ dwellings” scenario without specifying design, layout, height, or mitigation. This may lead to overestimating landscape sensitivity.
- The site lies on the edge of Dunchurch, where landscapes are typically transitional (urban–rural interface) and already influenced by nearby housing, roads, and infrastructure.
- Comparable edge-of-settlement parcels near Rugby are classified as High–Medium sensitivity, while the client’s site is assessed as High sensitivity, despite having similar characteristics.
- The report also identifies inconsistencies in the assessment maps and colour coding, which may cause confusion about sensitivity levels.

The sensitivity rating applied to the client’s site at Dunchurch is not fully justified or consistently applied. Due to its containment, settlement-edge location, and transitional character, the site is more comparable to areas rated High–Medium sensitivity, rather than the more exposed and intact landscapes rated High sensitivity in the valley.

In addition, Policy ENV3 also makes a specific reference at part d) to the protection and where possible enhancement to Dunchurch Lodge registered park and garden.

The Dunchurch Lodge Park and Gardens and relevant buildings within the site are already extensively protected by the relevant statutory legislation including Grade II listed park and gardens. There is no need for the fields to the south of the property to be protected in landscape terms, given their distances and separation from the site. They are not read in perpetuity. The necessary legal controls to development are already in place, it is utterly unnecessary for a further policy related to landscape to be included.

Next steps

If the LPA consider that if designation is still considered to be necessary and justified that the designation is revised and policy wording is not sound and justified as the area it covers is too broad and applies a blanket approach.

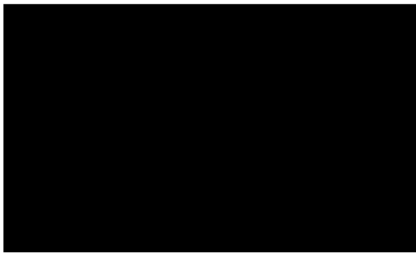
- Propose that the boundary is amended to remove areas that are evidenced to be less sensitive. The reference to Dunchurch Lodge should be removed at part e of the policy. This is completely unnecessary given the heritage legislation is already in place here.

- The whitewashed nature of the Landscape assessment produced by Node should be much more focused, and revised to take on board the comments and recommendations raised by the independent assessment that has been supplied as part of these submissions by Turley.
- Propose new policy wording so that it is less restrictive/blanket approach to preventing development.

We would be happy to engage in a further consultation with the LPA on this matter, and would urge that it does not proceed with the Local Plan with these elements which are currently considered to be unsound, given the inconsistencies that have been raised.

If you require any further information, then we would be pleased to provide this.

Yours sincerely



Sophie Rae