



Hillmorton Voice Representation

Publication Draft – Regulation 19 Consultation Local Plan Review 2024–2045

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1	10/3/26		HV Committee	RBC and HV committee
B	7/3/26			Initial review
A	6/3/26		-----	HV Committee for amendment

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1. Summary of policies addressed in this response

Policies/Section to which this relates			Response form submitted	Addressed in this response	Supported	Supported with minor Modifications	Rejected
S1 – settlement Hierarchy			S2	S2	S1		
S2 – Strategy for homes			S3	S3	S2		
S3 – Strategy for Employment Land			S4	S4	S3		
S4 - Sites for Gypsies and Travellers			S5	S5		S4	
S5 – Countryside protection			S6	S6		S5	
S6 – Residential Allocations			CL 2		CL 2	S6	
CL2 - Renewable energy and low carbon...			EN2	EN2	EN2		
EN2 – Landscape Protection			EN3	EN3		EN3	
EN3 - Rainsbrook Valley landscape of...					EN4		
EN4 - Areas of Separation			EN5	EN5		EN5	
EN 5 – Biodiversity Net gain							
EN 6 – Canopy Cover			I5	I5			I5
I5 – New Railway Station			338	338		338	
Site 338 – Crick Road - Houlton							
Legal Compliance and Duty to Cooperate				Soundness		Yes	No
	Yes	No		Justified		X	X (I5)
Legally Compliant	X			Effective		X*2	
Duty to Cooperate		X*2		Consistent with National Policy		X*1	
*1 With modification				Positively Prepared		X*1	
*2 With further work							

Table 1 – HV response to Regulation 19 Policies and Sites

2. Overview

- 2.2. This representation is a response, on behalf of the *Hillmorton Voice Residents Association* (HV), to the Rugby Brough Council Draft Local Plan (Regulation 19).
- 2.3. Hillmorton Voice finds the plan for Rainsbrook Valley sound, with minor modifications needed under NPPF paragraph 35 to ensure it is positively prepared, justified, effective, and consistent with national policy. The suggested areas for policy modifications and policy response forms sent to RBC, area identified in Table 1, above.

3. Policy EN3 – Further information supporting this policy

- 3.2. HV fully supports the adoption of policy EN3, with minor modifications, as a necessary part of a sound plan.
- 3.3. HV believes that important information has been overlooked that could further strengthen Policy EN3 and which justifies the councils removal of sites 40 and 334 from policies S2 & S6. Our response “form” for policy EN3, explains why we view the Rainsbrook Valley Landscape of Elevated Sensitivity as essential for soundness. We are willing to discuss this at the Examination in Public if needed. Further elements are explored in appendix 1 to this document. In summary these are.
- 3.4. Collaboration with West Northamptonshire is needed, as there is no Statement of Common Ground or agreement with Barby & Onley and Kilsby Parish Councils. HV’s discussions indicate these councils and WNDC councillors spoken to support Policy EN3, and formal endorsement is expected for the Regulation 19 consultation. SALFV (Stand Against Lodge Farm Village) and A4D (Action for Dunchurch) have also confirmed their support for Policy EN3. Work to resolve this are required to make the plan Justified and Effective and Sound.
- 3.5. The cumulative effects of development at DiRFT, near Rugby, have not been thoroughly considered or consulted on with WNDC, questing the plans effectiveness.
- 3.6. The scale of development adjacent to Hillmorton makes the Spatial Strategy Imbalanced, if further allocation were made this would call into doubt the plan being Justified.
- 3.7. Warwickshire County Council's traffic studies use morning and evening averages, which overlook Hillmorton's unique peak surges driven by the DiRFT site and proximity to the M1 Motorway and Houlton, these impact

network capacity and resident amenity. Further development would be without relevant evidence questioning the plans soundness.

- 3.8. The nature of sites 40 and 334 is such that we believe they are undeliverable, not Effective and undermine the Soundness of the Local Plan.
- 3.9. The evidence base supports policy EN3, aligning with landscape assessments completed for the local plan and previous findings by Rugby Borough Council and Warwickshire County Council. Planning inspectors have consistently concluded that the Valley deserves protection.

4. Areas of modification to policy EN3

- 4.2. After reviewing policy EN3, we find the drafting lacks clarity required by the NPPF and may not achieve RBC's intended outcomes. We recommend modifications to enhance clarity.
- 4.3. Link policy EN3 to strategy policies and other related policies similar to the drafting in EN4, to clarify their interactions for future assessments.
- 4.4. Define what constitutes "adverse impact" from development in the Rainsbrook Valley area of policy EN3
- 4.5. Make sure that policy EN3 and I5 Railways clearly indicate that developing the Rugby Parkway station does not imply that additional development within Rainsbrook Valley is allowed or considered sustainable.
- 4.6. Linking policy EN 3 with policy EN5 to provide a coherent policy framework.

5. Policy I5 – Rugby Parkway Station

- 5.2. HV recognises that outline planning has been granted for Rugby Parkway station but finds the traffic studies supporting this approval unconvincing. HV objects to Policy I5 (Railways), arguing that safeguarding land for a possible "fast line" connection and expanding station parking in Rainsbrook Valley is premature given the lack of evidence of need, unnecessary and unsustainable and as such this makes the plan unsound as it is not Justified. We believe this approach contradicts Policies S5, EN1, EN2, and EN3 and is therefore not Deliverable.
- 5.3. We believe a modification to policy EN3 is required so sites outside the designated area of policy EN3, but which affect visual receptors, do not have an adverse impact, undermining the intention of policy EN3. The

planning balance should consider this and also the effect on visual receptor across the Rainsbrook Valley.

6. Removal of sites 40 & 334 from in policy S6

6.2. HV supports the removal of site 40 Land East of Kilsby Lane and site 334 Barby Lane from the plan's housing allocations as a vital element of delivering a Sound plan. We consider that neither site represents a sustainable or deliverable option, particularly in light of consistent refusals at appeal for developments of this scale in these locations. Their exclusion aligns fully with Policies EN1, EN3, S5 (Protection of Countryside), and S1 (Settlement Hierarchy).

7. Unconsented development context to policy EN3

7.2. We highlight ongoing patterns within the Hillmorton ward involving unauthorised development, enforcement challenges, and cumulative environmental degradation in the Rainsbrook Valley, factors which provide compelling evidence that sites 40 and 334 are unsuitable, undeliverable, and inconsistent with national policy objectives. These sites are situated within a valued landscape already subject to significant cumulative harm and lack essential infrastructure development.

7.3. The History of unconsented development substantiate and reinforce the Council's decision to remove sites 40 and 334, clearly demonstrating that their exclusion is necessary to ensure the soundness of the plan. The history of unconsented development and inadequate enforcement further underscores the need for robust policy control in this area, as provided in Policy EN3. We do not believe these sites should be reinstated under any circumstances. Should these sites be considered by the Inspector we request the opportunity to explore the above and discuss the basis on which we consider these sites to be undeliverable.

8. Support for site 338 – Crick Road Houlton

8.2. We support allocating site 338 Land on Crick Road near Houlton, as it is adjacent to the existing Houlton major housing development, which makes it more sustainable. Most of the development lies beyond the ridge marking the Rainsbrook Valley Northern Scarpe edge.

9. Supporting information

10. Policy EN3 - NPPF policy and context

- 9.2. NPPF paragraphs 187–201 require planning policies to protect and enhance valued landscapes.
- 9.3. The Rainsbrook Valley, RBC Landscape study (Node 2025) defined the susceptibility to development of the Rainsbrook Valley, as defined by policy EN3, to be High and with Elevated Landscape Value.
- 9.4. Deliverability Concerns exist in the Hillmorton extent to the Valley due to unconsented development and failure to enforce by RBC. Leading to plan soundness issue due to poor deliverability if policy EN3 were not in place. (NPPF 16, 119–122).
- 9.5. Landscape susceptibility is defined by the Guidelines for Landscape and Visual Impact Assessment¹, as: ¹ *“the ability of the landscape receptor (whether it be the overall landscape quality or condition of a particular landscape type or area or an individual element and or feature or a perceptual aspect) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and or the achievement of landscape policies or strategies”*

10. Evidence base

10.1 Landscape Character and Sensitivity

- 10.2. Rugby Borough Council’s Rainsbrook Valley Landscape Sensitivity Study (Node December 2025) identifies the majority of the valley, defined in policy EN3, as being areas of high and medium-high sensitivity to development.
- 10.3. The Node Landscape Sensitivity Assessment confirms that the Rainsbrook Valley should be understood as a single, coherent landscape system, rather than a collection of unrelated field parcels. Landscape character and value arise from the valley’s combined landform, spatial continuity, visibility and experiential qualities, which cannot be meaningfully assessed on a field-by-field basis.

¹

Guidelines for Landscape and Visual Impact Assessment, Third Edition, Landscape Institute and IEMA, 2013

- 10.4. The Node study treats the valley as a single landscape receptor, meaning that development in any part of the valley would affect the character and perception of the valley as a whole.
- 10.5. In evaluating landscape value, the Assessment concludes that the Rainsbrook Valley possesses sufficient scenic, recreational and amenity qualities to be classified as a landscape of “good” value.
- 10.6. The Node Study concludes that the valley has high susceptibility to major residential development.
- 10.7. That across most of the valley the overall landscape sensitivity is high, because urbanising development would be widely visible and would fundamentally alter the existing rural character.
- 10.8. The Node Study conclusions are significant because they form part of the Council’s own commissioned evidence base, rather than representing the views of a third party.
- 10.9. This assessment therefore demonstrates that large-scale residential development within the Rainsbrook Valley would generate substantial and difficult-to-mitigate landscape effects, arising directly from the valley’s coherent form and high sensitivity.
- 10.10. The finding of the Node assessment are strikingly similar to previous assessments over the last two decades, including.
 - 10.10..1. The 2006 Landscape Assessment, which said – Rainsbrook escarpment “highly sensitive... cannot be overemphasised.”
 - 10.10..2. The 2017 Rainsbrook Valley Sensitivity Study – Sites 40 and 334 (zones 14a/14b) are “highly sensitive” and unable to accommodate development without significant harm.
 - 10.10..3. Planning Inspector finding in the 2019 Local Plan – allocation in the valley was rejected as unjustified. In the 2019 Inspectors report para 77, it was said “.... In terms of landscape quality, the development strategy has sought to avoid the most sensitive landscape within the Rainsbrook Valley on the southern fringe of Rugby, based on the findings of the Landscape Sensitivity Study and Rainsbrook Rural Landscape Study. As well as guiding the selection of South-West Rugby, this also informed the decision not to allocate further sites at the south-eastern end of that fringe [Hillmorton], which is justified....”
 - 10.10..4. Appeal Inspector (APP/E3715/W/16/3158785) – said the escarpment is a “strong landscape feature... high sensitivity and high landscape value.”
 - 10.10..5. R15/1366 Land East of Kilsby Lane, R15/20 & R16/2391 and appeal for 2391 25 Barby Lane and Walding Farm, both adjacent to site 334, the planning refusals stated, “The proposed development [Rainsbrook Valley Dunsmore Plateau Fringe area] would have a significant and adverse impact on the character and appearance of the landscape in this location. In particular, the proposed dwellings would appear as an intrusive extension of

the urban area into the surrounding countryside and would diminish the landscape character of this area. They would further appear visually intrusive and prominent within the landscape to the point of being harmful to the qualities, character and amenity of both the countryside and setting of Hillmorton...” - “Having visited the site [25 Barby Lane adjacent to Draft Local Plan site 334 Barby lane] and surroundings and seen the landscape from viewpoints to the south, including some of those used in the LVA, I agree with the landscape character studies and the WCC assessment that the slopes of the escarpment are highly visible, a strong landscape feature, of high sensitivity and of high landscape value. In this regard I give most weight to the 2006 landscape study which was carried out in the absence of development proposals and therefore should be seen as being more objective.”

- 10.10..6. The recently commissioned landscape sensitivity assessment for Dunchurch Pools Marina undertaken by INCOLA, March 2026, underlines and supports the conclusions of the previous studies and finds that that the whole Rainsbrook Valley is of High sensitivity. This mirrors the position of Hillmorton Voice and identifies that omissions made in the Node’s study 2025, if considered, would demonstrate that the valley is even more sensitive
- 10.10..7. Collectively these assessments support the Councils adoption of policy EN3

10.11. Landscape Quality

- 10.12. At the heart of policy EN3 is a recognition of the longstanding view that the Rainsbrook Valley and its northern scarp edge in the Borough is of High Landscape Value. We are pleased that the policy is evidence based and uses current guidelines (GLVIA3) to clearly demonstrate the basis for such a designation. Under this assessment the following factors are considered and in summary they are.

Landscape quality (condition): Very High	A measure of the physical state of the landscape. It may include the extent to which typical character is represented in individual areas the intactness of the landscape and the condition of individual elements.
10.13. The majority of the valley has landscape denoted as moderate or good quality. With notable areas such as the Oxford Canal, Central Railway, the Jubilee woods and Dunchurch Park.	

Scenic quality:	The term used to describe landscapes that appeal primarily to the senses (primarily but not wholly the visual senses).
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High	
10.14.	The scarp edge of the Rainsbrook Valley provides a dramatic contrast from the Urban Fringe of Rugby to open countryside. This is apparent travelling south from Hillmorton, Paddox or Dunchurch. The scenic quality is also relevant to visual receptors in West Northamptonshire and development in this area. We believe this should be considered in the planning balance for developments within and affecting the area defined in policy EN3.

Rarity:	The presence of rare elements or features in the landscape or the presence of a rare Landscape Character Type.
10.15.	The Rainsbrook Valley contains one of the last areas of valley landscape surrounding Rugby, much of the remainder now being urbanised.

Representativeness:	Whether the landscape contains a particular character and/or features or elements which are considered particularly important examples
10.16.	The area defined in Policy EN3 forming the Northern scarp edge of the Rainsbrook Valley is the Urban Boundary to the Majority of South Rugby. It provides a distinct transition at this urban edge to open countryside as the land falls away offering views to the nucleated villages on the Southern ridge of the same valley. Such undeveloped, open landscape with large elevation changes is almost entirely unique in Rugby.
10.17.	It might be suggested that the proximity of Rugby's southern urban edge indicates that the valley could accommodate further development.
10.18.	The Node Assessment specifically addresses this proposition and explains that while aerial or map-based analysis may suggest potential capacity, the local topography and valley landform largely screen the existing urban edge from many viewpoints within the valley.
10.19.	As experienced on the ground, the Rainsbrook Valley therefore functions as a distinct rural landscape, visually and perceptually separate from the built form of Rugby.
10.20.	This characteristic is precisely what gives the landscape its high sensitivity to major housing development. Development within the valley would not appear as a modest extension of the town but as conspicuous urban form within an open countryside setting.
10.21.	The Assessment indicates that this effect would occur not only across the valley floor and southern slopes but also

along the northern valley slopes closer to Rugby, where development could appear as a prominent new settlement edge or descending built form within the valley. 10.22. The resulting change would therefore be experienced from a wide range of viewpoints, including public rights of way, elevated land surrounding the valley and longer-distance vantage points. 10.23. The Council's own landscape evidence demonstrates that development in these locations would remain visually prominent and landscape-defining, rather than assimilating as a conventional urban edge extension.	
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Conservation interests: Very High	The presence of features of wildlife, earth science or archaeological or historical and cultural interest can add to the value of the landscape as well as having value in their own right.
10.24. The scarp edge of the valley has strong Conservation interest with numerous wildlife areas, parks, allotment and sports fields. These sites, collectively, form stepping stones from Hillmorton to Dunchurch. In essence a wildlife corridor. It is also site to a regionally significant geological feature and the grade ii listed Dunchurch Park and the Industrial heritage of the original alignment of the Oxford Canal within site 40.	

Recreation value: Very High	
10.25. The Valley supports many walking, cycling and bridleways. Is the location of the Dunchurch Pools Marina, Barby Marina, Hillmorton Wharf Marina, all of which support the canal leisure community with 10% of the UK's boats moored in close proximity to Rugby. It is home to many sports fields, allotments and a network of walkways across the valley. Central to the identity of the Eastern end of the Valley is the Oxford Canal where the tow paths provide a linear park for resident's amenity. 10.26. The Node Landscape Sensitivity Assessment also identifies a significant heritage dimension within the valley landscape. This includes designated heritage assets, Registered Parks and Gardens, Scheduled Monuments and historic landscape features that collectively contribute to the valley's historic character and setting. 10.27. These elements form part of a wider historic landscape framework, shaped by the relationship between landform,	

historic routes, settlement patterns and surrounding countryside.

10.28. The Assessment also records that the valley supports strong recreational use, with an established network of public rights of way including footpaths and bridleways.

10.29. These routes enable residents and visitors to experience the valley directly and contribute significantly to its amenity and recreational value, reinforcing its role as an accessible countryside resource for the wider Rugby area.

10.30. Supporting commentary to Policy EN3 similarly notes that the broader Rainsbrook Valley landscape performs strongly in terms of heritage value, recreational function, landscape distinctiveness and scenic character, including areas beyond the currently defined policy boundary.

10.31. HV therefore considers that the Rainsbrook Valley should properly be recognised as a valued landscape corridor, providing important cultural, recreational and environmental functions.

10.32. In these circumstances, the valley cannot reasonably be regarded as reserve land for a Station (I5) or strategic housing growth (Lodge Farm), since the Council's own evidence demonstrates that it performs an important landscape, heritage and recreational role within the borough.

Perceptual aspects: and/or tranquillity.	A landscape may be valued for its perceptual qualities, notably wildness
High	
10.33.	The valley is not truly wild or tranquil with the M45 bisecting the valley and developments such as DiRFT being close by which is the case in some way for most of the Borough. However, neither of these are overtly an impact and both are at a distance from Rugby and in the case of the M45 largely set into the landscape. The actual experience of the Valley, looking towards open countryside, across long views to the rising land opposite is a source joy and beauty. When the occasional noise that punctuates the valley stops, you "hear" the silence. This is particularly so at times where amenity value is at its greatest, at weekends, evening and during the working day. At these times the silence and contrast highlight the tranquillity of the Rainsbrook.

Associations:	Some landscapes are associated with particular people, such as artists or writers, or events in history that contribute to perceptions of the natural beauty of the area.
10.34.	The residents of Hillmorton believe that the Rainsbrook Valley landscape requires protection, evidenced by an online survey which Hillmorton Voice launched in the Autumn of 2025 that showed 95% of respondents being against the developments of the sites in Hillmorton and wanting protection for the Rainsbrook Valley. More recently this strength of feeling has been formalised with over 330 residents of Hillmorton supporting this response. This support is replicated in Parishes along the Southern and North Scarpe edges of the Valley. The valley is considered the inspiration for the Rupert Brook Poem “The Chilterns” and is the setting for many elements of the book <i>Tom Browns school day</i>. In the late 60’s it was the setting for Pink Floyd, as just a support act to local bands at a rock festival. It is the setting for Canal and key amenity and leisure resource. It is the beautiful and tranquil backdrop for our crematorium and cemetery where we say goodbye to our loved ones. It contains the Great Central Way an echo of the powerhouse that was Rugby’s’ railway heritage. 10.35. Separately to the response by Hillmorton Voice our discussions with other communities show they will be supporting the Rainsbrook Valley and Policy EN3. This includes the Parishes of Kilby, Barby and Onley, Yelvertoft, Dunchurch and Thurlaston. There is also widespread community support by local groups including the Ashlawn Garden Residents Association, Action for Dunchurch (A4D) and SALVF (Stand Against Lodge Farm Village). These groups collectively represent a considerable part of the population of Southern Rugby.

10.36. Elevated Sensitivity

10.37. *The Rainsbrook Valley Landscape Sensitivity Assessment (Node December 2025) identifies the valley as highly sensitive. The numerous sites along the scarp edge contribute to wildlife, amenity, and historical value, reflecting ongoing community support for preserving its mostly undeveloped state.*

10.38. Table 2 shown below records the sites which support the elevated landscape sensitivity and underpin the validity of the protection given under policy EN3. The sites are generally noted East to West along the Valley.

WARD	Contribution to landscape sensitivity
Hillmorton	• Oxford Canal and previous alignments within site 40
	• Green and Blue Infrastructure Corridor (Hillmorton scarp edge) in 2019 local plan
	• Canal amenity and economic value for tourism
	• Hillmorton Sandpit site (used informally) for walking by Hillmorton residents. Grid Ref SP 571.2
	• The inspiration for Rupert Brooks poem “The Chilterns” while on walks from Hillmorton, along the Oxford Canal and up Barby Hill, from where there are views across “The slumbering Midland Plain”.
	• The Oxford Canal towpath and amenity value of the canal
	• Oxford canal as a proposed conservation site and the designated conservation site over the county boundary within WNDL.
	• Green space for sport at the Rugby FC field, providing amenity to Rugby residents.
	• Hillmorton Vale. The site of a primary school taken into private management by the Hillmorton Vale Community Association, to provide amenity for Hillmorton.
	• Sport fields forming part of English Martyrs Primary School
	• A wide network of public footpaths

Table 2, part 1 – Factors which contribute to the sensitivity of the Rainsbrook Valley

WARD	
Paddox	• The Cemetery when many from Rugby borough bury their families and grieve,
	• The site of the Rugby Festival where Pink Floyd were still a support band
	• <i>Ashlawn School sport fields</i>
	• <i>St Andrews Rugby Football Club</i>
	• <i>Allotments at Ashlawn Road/Penny Lane</i>
	• <i>The Jubilee Woods – a biodiverse woodland forming the backdrop to the Crematorium site.</i>
	• <i>Ashlawn Cutting Wildlife site managed by Warwickshire Wildlife Trust(Great Central Walk South SP57A1)</i>
	• Allotments adjacent to the Great central way.
	• Rugby Miniature Railway – off Onley Lane/Ashlawn Road B4429
	• Footpath from Ashlawn Field to Onley Field
Dunchurch	• Dunchurch Park (Grade ii listed structure)
	• Dunchurch Park Gardens (Grade ii listed gardens)
	• Dunchurch Hall Meadow (SP47V1R & SP 47 V1)
	• Land East of Laurel Farm (SP47V1p)
Thurlaston	• The scarp edge forming the northern bank of Draycote water
	• Draycote Water (SP47K3)
General	• <i>A wide network of public footpaths</i>
	• Land noted as strong for much of the area defined in EN3 – Node study 2025
	• The location of the cross-country run, in Tom Browns school days

Table 2, part 2 – Factors which contribute to the sensitivity of the Rainsbrook Valley

10.39. In addition to the above many people are surprised to learn that the Rainsbrook Valley being part of the 3 Junctions Area, has 10% of all UK canal boats moored, this includes areas within Hillmorton Ward. The context of the Valley as a rural area is important to support this amenity and the economic value it provides.

11. Failure to enforce planning law as the basis for concerns over deliverability of site 40 and 334

11.2. In the last decade developments have progressed within the Eastern, Hillmorton extent of the Rainsbrook Valley. In many cases, consent was not given and enforcement has not been taken or has been ineffective (ref NPPF 144.a) The instances are tabulated below.

11.3. Marina at Hillmorton Wharf - with residential floating accommodation pods (not	11.4. No planning request, no enforcement action taken
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vessel capable of travel) added without consent.	
11.5. Hillmorton Wharf – new portal frame building erected without planning or building control	11.6. No planning requested, no enforcement action taken.
11.7. Development of part of site 40 (land east of Kilsby Lane) for unconsented use as B1/B2. Topsoil strip and sub soils strip and hardcore laydown areas placed across the entire field of good agricultural land.	11.8. No planning requested, RBC currently taking enforcement action ref E24/0391 
11.9. Development of approx. 2400 m2 Concrete hardstanding, building and waste bunkers on a consented waste transfer station. With growth larger than permitted development limits, development outside the curtailments of the site, permanent works within 10 metres of a water course (Oxford Canal) without captive drainage.	11.10. Initially as a WCC lead action, WCC and RBC joint enforcement action. WCC have since withdrawn due to the risk of them being time barred on a technical element of the original plan. RBC enforcement has taken over the action, as noted above.
11.11. Approval of re-submitted application for 26 Holiday cottages adjacent to the Oxford Canal previously consider a decade before as a major scheme.	11.12. RBC approved the scheme despite the ten-year gap and without considering the significant change in context of development in the valley and wider area, unconsented works at the adjacent Marina or the 6600 houses consented at Houlton. This was not treated as a major

	development for planning or consultation.
11.13. Approval of the above holiday scheme to move to 24/7 - 365-day residency from the previous 11month use.	11.14. RBC did not consult on this issue, and the permission was granted by the planning team before any work on the original scheme had even started. It is HV's contention that this change was part of a future proofing plan to improve the consenting of the site as support for housing development. The site has yet to substantially progress over the last 2 year.

11.15. Such issues directly affect site 40 and the promoter of this site who has already started development without consent, much of site 40.

11.16. The issues noted indicate how difficult it would be to effectively control development of site 334 and 40. .

11.17. We believe there is clear evidence of incremental, unauthorised and poorly controlled development within the Rainsbrook Valley and specifically close to or at site 40 Land East of Kilsby Lane including parts of site 40 itself. This pattern is relevant to the soundness of any proposal to allocate Sites 40 Land East of Kilsby Lane and has relevance more generally to site 334 Barby Lane.

13. Removal of sites 40 and 334 from the allocation under Policy S6

13.2. It is acknowledged that the Local Plan, as amended for Regulation 19, has revised several site allocations including the removal of sites 40 and 334. HV support this as a necessary step to deliver a sound plan, believing both sites to be inconsistent with policy.

13.3. Relevant allocations (table3)

Site	Location	Status Reg 19	HV view
40	Land East of Kilsby Lane	Not allocated	We support the removal of this allocation as the land is considered to be High Landscape sensitivity and allocation would contradict Policy S1, S5, EN1 and EN3 of the draft plan.
334	Barby Lane	Not Allocated	We support the removal of this allocation as the land is considered to be High Landscape sensitivity and allocation would contradict Policy S1, S5, EN1 and EN3 of the draft plan.
338	Crick Road – Houlton	Allocated	We support the allocation of this site as sustainable albeit with concerns about massing and the visual impact on the Valley ridge line and visual receptors.

Table 3, Hillmorton policy S6 allocations (reg 18/19)

13.4. The pattern of unauthorised development, enforcement difficulties and cumulative degradation in the Rainsbrook Valley provides strong evidence that Sites 40 and 334 are unsuitable, undeliverable and inconsistent with national policy. The location is within a valued landscape and an area experiencing significant cumulative harm and without infrastructure development. These factors materially reinforce the Council's decision to remove the sites and demonstrate that their exclusion is necessary for the plan to be sound.

13.5. We believe the Council's decision to remove Sites 40 and 334 is justified, evidence-based and necessary for the soundness of the Local Plan. We request that the Planning Inspector accept the removal of Sites 40 and 334 as necessary for soundness and in context of policy S1, S5, EN2 & EN3, confirming that their allocation would make the plan unsound.

13.6. Evidence Base

- 13.7. The following issues confirm why sites 40 and 334 are not suitable and why their removal from the plan is evidence based and sound.
- 13.8. Hillmorton has already experienced substantial cumulative harm from multiple developments and unauthorised activities. The growth of Houlton on the edge of Hillmorton Ward (which has 4200 dwelling) indicates a local growth of consented housing of 157% since 2021 with 50% growth already delivered. Hillmorton is adjacent to the DiRFT development, the scale of which by area equates to circa 18,000 dwellings. Additional major housing development would push the area beyond sustainable limits. We believe this represents an unbalanced spatial strategy contrary to NPPF paragraphs 15 and 73–83. The cumulative impact is a mandatory consideration in assessing site suitability and we believe Cumulative Impact of these development means the landscape, community, and transport network cannot sustainably absorb further development without significant harm and suggests that plan soundness should rule out further major sites in Hillmorton.
- 13.9. Two sites in Hillmorton were proposed in the draft local plan (Reg 18) sites 40 & 334 are both outside the urban boundary of Rugby Town (S1.A.i) and are not Main Rural Settlements (S1.A.ii) and as such do not meet the settlement hierarchy and are contrary to policy S1.
- 13.10. Sites 40 and 334 form part of a ribbon of wildlife sites that form a corridor and allocation would not be compliant with NPPF paragraph 192. With site 40 being part of a green infrastructure corridor.
- 13.11. There is clear evidence of incremental, unauthorised and poorly controlled development within the Rainsbrook Valley This pattern is relevant to the soundness of any proposal to allocate Sites 40 or 334.
- 13.12. Further development in this area would not align with NPPF which requires local Infrastructure to be in place (NPPF 11a), nor Policy I4. A & 9.10, as Infrastructure is not present and no plan is in place to deliver this.
- 13.13. There exists a lack of healthcare infrastructure in Hillmorton with no GP in this or adjacent wards and one small private dentist.
- 13.14. Hillmorton is the furthest ward of the borough from our main Hospital services in Coventry.
- 13.15. Local secondary schools, Houlton and Ashlawn are at capacity and our children will soon have to travel to Harris, Bilton or Avon Valley schools . An urban bus journey time of over half an hour.

- 13.16. Both sites are within the area designated by policy EN3 as of elevated sensitivity and inclusion would result of Significant and Irreversible Landscape and Visual Harm
- 13.17. Highways Constraints - Evidence shows the Barby Lane / Kilsby Lane corridor operates at or near capacity, with limited ability to create safe access. Development here risks severe residual impacts contrary to NPPF 119–120.

14. Site 40 Land East of Kilsby Lane – specific issues

- 14.2. The failure to regulate previous, unauthorised development on site 40 highlights Deliverability Concerns (NPPF 16, 119–122). We believe the Planning Inspector should consider whether a site can be delivered in a policy-compliant manner. The presence of unauthorised uses, unresolved enforcement matters, and irregular development patterns indicates a challenging management environment that undermines confidence in delivering the site with appropriate design, landscape, ecology, access and drainage controls.
- 14.3. The Oxford canal adjacent to site 40 constitutes an asset which is of community value and has significant heritage value to this and future generations. The Canal and Rivers Trust in their letter CRTR-POL_2023-40198 dated 30/1/2024 see the Canal as a non-designated Heritage asset as it links many listed bridges and structures.
- 14.4. Within the latest update to the Environment Agency's Flood Maps the site is shown to be at a heightened risk of surface water flooding within the western area of the site.
- 14.5. Site 40 contains the original alignment of the Oxford canal, a feature of Industrial Heritage value also acting as a cut off barrier having an impounding effect and exacerbating flooding.
- 14.6. The Valley is a sensitive landscape with a demonstrably rural character. Unauthorised development has already eroded this character and allocating Sites 40 or 334 would further intensify harm contrary to NPPF policy to protect valued landscapes and maintain intrinsic character. Landscape and Character Protection (NPPF 130, 180).
- 14.7. It is our view that the site is no longer available as approximately 32% of site 40 (1.56 ha) is currently on the market for sale which raises concerns whether the entire site could be developed. The site is marketed as a large open storage space with B1/B2 use. This despite this use being unconsented, it is currently designated as open farmland.

14.8. Given the complex planning history of the area affecting site 40 and 334 and the damaged landscape baseline, Sites 40 and 334 are clearly inferior to other available strategic alternatives. Allocating them would therefore fail the "Justified" soundness test. Reasonable Alternatives (NPPF 31)

----- END -----

Hillmorton Voice Residents Association

Basis for representation on behalf of Residents. For the Regulation 19 Consultation on the Rugby Borough Council Local Plan.

Document number - HV/R19/002

Revision	Date	Author	Checked by	Issue to
1	10/3/26		Agreed by HV committee	RBC and HV committee
B	7/3/26			Initial review
A	6/3/26		-----	HV Committee for amendment

1. Basis for Representation

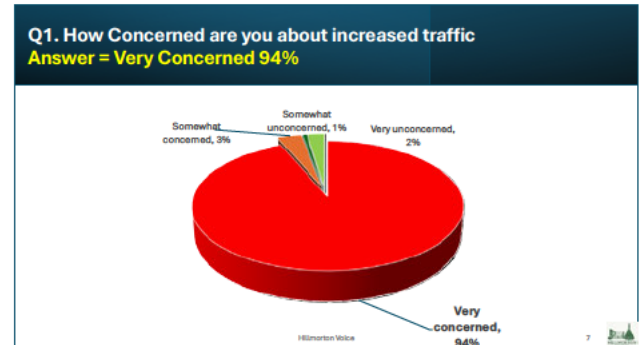
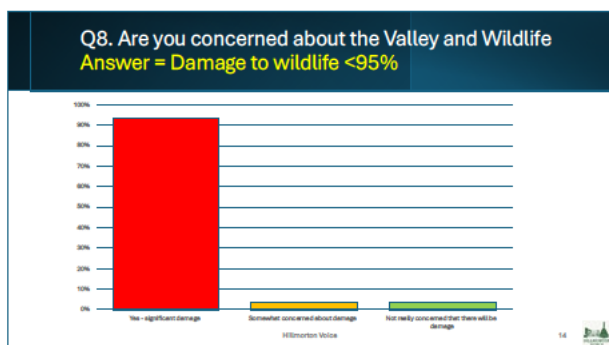
The representations submitted are by Hillmorton Voice (HV), a neighbourhood group registered with Rugby Borough Council via Warwickshire CAVA. Additionally, HV manages an open Facebook page with a significant membership from the local community. Given ongoing development in Hillmorton and rising pressures on Rainsbrook Valley, HV considers it imperative to continue participating in the Local Plan Examination. This includes a desired to attend hearings to elaborate on our submission, respond to additional evidence, and advocate for the effectiveness and proper implementation of Policy EN3 and related measures to safeguard Rainsbrook Valley. Our representation for the community based on.

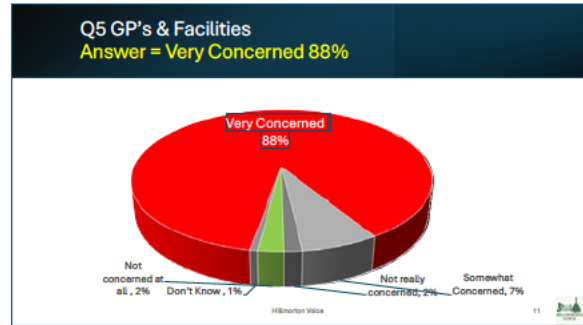
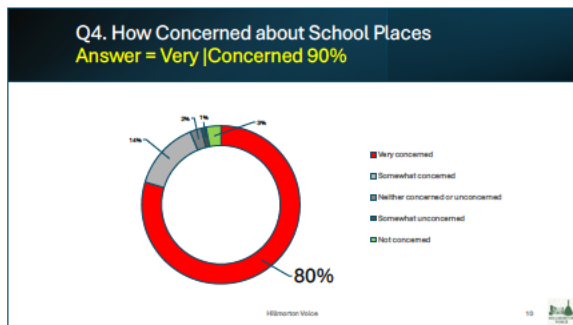
- a. Consent for HV to act for Hillmorton and Paddox wards, supported by individual letters, emails, and online confirmations including names and addresses indicated below.
- b. Results from our Q3/Q4 2025 online survey, which received over 200 responses ahead of the regulation 19 consultation.
- c. A petition in Q3/Q4 2025 for protecting Rainsbrook Valley and managing local development, with 95% support from respondents.

HV's objective is to facilitate meaningful input from Hillmorton and Paddox residents in the Rugby Borough Local Plan consultation. Over the past year, HV has actively engaged with RBC and contributed to the Regulation 18 consultation.

2. Q3/Q4 2025 Survey Questionnaire Responses

- 95% of residents were against the original local plans proposal to allocate sites 40 & 334 (Barby and Kilsby Lane sites)
- The principal concerns noted by residents were
 - Destruction of ecology and open spaces
 - Traffic
 - Lack of; healthcare, dental provision, school provision.
 - A general feel that Hillmorton has done enough (in context of the Houlton SUE)





3. Consent to complete Regulation 19 responses on behalf of residents of Hillmorton and Paddox ward.

In February 2026 as part of the Regulation 19 consultation, residents were offered the option to have HV comment on the new plan. This was framed as support for further protect to the Rainsbrook Valley through policy such as EN3 and EN5.

We asked the question via an online portal (using MS Forms)

“Are you happy for Hillmorton Voice to represent you in our response to the Planning Officer in support of RBC’s revised local plan concerning the Rainsbrook Valley and Hillmorton?”

We asked these additional questions, with residents required to confirm acceptance as part of their agreement. This was to ensure clarity of intent to residents.

1. I would like Hillmorton Voice to let the inspector know that you support the protection of the Rainsbrook Valley (policy EN3)
2. I support the removal of site 334 Barby Lane from the housing allocations in the local plan
3. I support the removal of site 40 Kilsby Lane from the housing allocations in the local plan
4. I believe that Hillmorton does not have sufficient infrastructure to build more houses locally. Doctors, secondary schools, dentists, major supermarkets, and limited road capacity.
5. Traffic is a real issue, and I think the planners have failed to recognise the effect of shift changes at DIRFT and the developments along the Houlton to Ashlawn corridor. This means traffic queues.

We received 100% acceptance of all aspect together with the wider approval for HV to act on their behalf in the regulation 19 response.

We have received 298 confirmation of representation which are tabulated below. The native MS forms data is available for review should this be required by RBC or the inspector.

[illegible]

[illegible]

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

Name or Organisation: Hillmorton Voice Residents Association.

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

Local Plan Paragraph		Local Plan Policy	EN2	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	Y	No	
(2) is Sound	Yes		No	x
(3) complies with the Duty to co-operate	Yes	Y	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.

To be read with additional document submitted.

- *HV/R19/001 – Hillmorton Voice Representation*
- *HV/R19/002 - Basis for representation on behalf of Residents.*

We support this policy but believe it needs clarification to align with NPPF 16.d. The current wording of EN2.5.8 highlights links to policies D3 (landscaping) and D1 (design), yet greater clarity is needed. Policy EN2 does not address the cross-boundary impact of landscape, especially in areas such as Hillmorton, which borders West Northamptonshire. Landscape receptors exist beyond Rugby borough, including settlements like Kilsby and Barby. As there is no statement of common ground, the policy should address this strategic cross-boundary issue. We propose an amendment to EN2.5.8 for these purposes.

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.

Modification Proposed

EN 2.5.8 addition of

“.....to the design of additional places. This policy directly contributes to Policy EN3 (...Rainsbrook) and should be considered to further clarify the requirements of Policy EN1.

EN2 New sub strategy.

“The protection of the Rainsbrook Valley recognises the intrinsic quality of the landscape. This has an effect on all who experience it including areas of West Northamptonshire. It is recognised that application of this policy requires direct engagement with the parties who are cross boundary consultees including the Parishes of Kilsby and Barby and Onley.”

(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:

Policies EN2 and EN3 influence and are influenced by Cross Boundary parties in West Northamptonshire. Addressing cross boundary issues is essential to achieving policy goals, especially given the limited dialogue by RBC. Hillmorton is directly affected by the outcome of this debate.

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.

Final



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

Name or Organisation: **Hillmorton Voice Residents Association**

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	X	No	
(2) is Sound	Yes		No	x
(3) complies with the Duty to co-operate	Yes	x	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.

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To be read with additional document submitted.

- HV/R19/001 – Hillmorton Voice Representation
- HV/R19/002 - Basis for representation on behalf of Residents.

Hillmorton Voice supports the adoption of draft policy EN3 'Rainsbrook Valley Landscape of Elevated Sensitivity' and the benefit it offers the Rainsbrook Valley. This Valley forms a sensitive landscape edge to Hillmorton and provides separation at the urban boundary, openness of landscape, amenity and environmental value for a series of stepping stone sites.

The countryside surrounding Rugby has long formed part of England's cultural landscape. The poet Rupert Brooke, whose father was a housemaster at Rugby School, spent his early years in the town and walking the surrounding countryside. Brooke's pastoral poetry reflects the quiet agricultural valleys that characterised the area. The Rains Brook valley remains one of the few surviving landscapes that still reflects this historic rural character and therefore forms an important part of Rugby's environmental and cultural heritage.

The valley now has practical value with many wildlife sites, and areas which resonate with the population of the local area. This same valley provides a similar function towards the west for Paddox Ward, Dunchurch and Thurlaston Parishes and to the South to cross boundary receptors including the Hilltop villages of Kilsby, Barby and Onley in the valley, all of which are in West Northamptonshire.

To make the policy sound as part of a wider plan, elements of policy EN3 require modification to deliver the policy outcomes intended when it is applied.

Area Covered by Policy EN3

The proposed designation and area indicated within the policy map, does not cover the entire area of what is considered the Rainsbrook Valley, within RBC's purview. The landscape assessment indicates additional areas that have been omitted, contrary to the evidence of RBC's own studies.

EN3 lack of clarity – NPPF part 3, cl 16.B

Despite the significance of policy EN3 and the central role it will play in policy and future assessments we believe the drafting does not provide sufficient clarity and risks not meeting the intention of the policy when considering development proposals in the future. The following amendment are therefore suggested to afford clarity. The reasons for these are.

- The Policy does not recognise many of the areas of importance which are present in the Valley within the ward of Hillmorton and Paddox leading to this area risking being undervalued.
- The Policy intent and likely application are contradictory to each other. As drafted the policy fails to afford genuine protection. This can be seen when compared to the more complete drafting for the similar and aligned policy EN4 (Areas of separation).
- There is no definition given for what constitutes significant and adverse impact.
- Adverse Impact of other local development on sensitive visual receptors

The landscape studies of the Rainsbrook Valley, all define the landscape as Highly sensitive to change. These assessments include the influence of views at sensitive visual receptors beyond the confines of the area, defined in policy EN3, this is particularly true for the rural vale to the southwest.

(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.

Amendments proposed to Policy EN3

Area covered by Policy EN3

We propose the following modifications to the area of policy EN3, we have used as a reference an image taken from INCOLAs' report, 2026, to Dunchurch Pools Marina and marked this up to indicate the approximate areas suggested to be modified, which includes.

- A - The higher ground at Toft Hill at the southwestern edge of the valley recognising it's prominent view across the valley and when approaching from the south. Development on these slopes would spill over into the valley. As recognised by 2017 Rainsbrook Valley Landscape Sensitivity Study, this area (parcel 14j), has a high sensitivity for housing developments due to the topography and openness, with high levels of intervisibility. (area coloured in blue)
- B- The land in the Valley base between Toft Hill and Willoughby.) having a significant visual impact on the areas of the Northern Ridge already included in Policy EN3. (area coloured Amber)
- C - The raised land to the Eastern extent of the valley, west of the Oxford canal and bounding the West Coast Main Railway line, in Hillmorton. This area forms part of a regionally important geological site and is a potential wildlife site having a major visual influence and effect on the Oxford Canal, the setting and views across the valley from receptors to the South and West. It is currently part of the safeguarded land for car parking in Policy I5, which we do not agree with. (Area coloured Red).

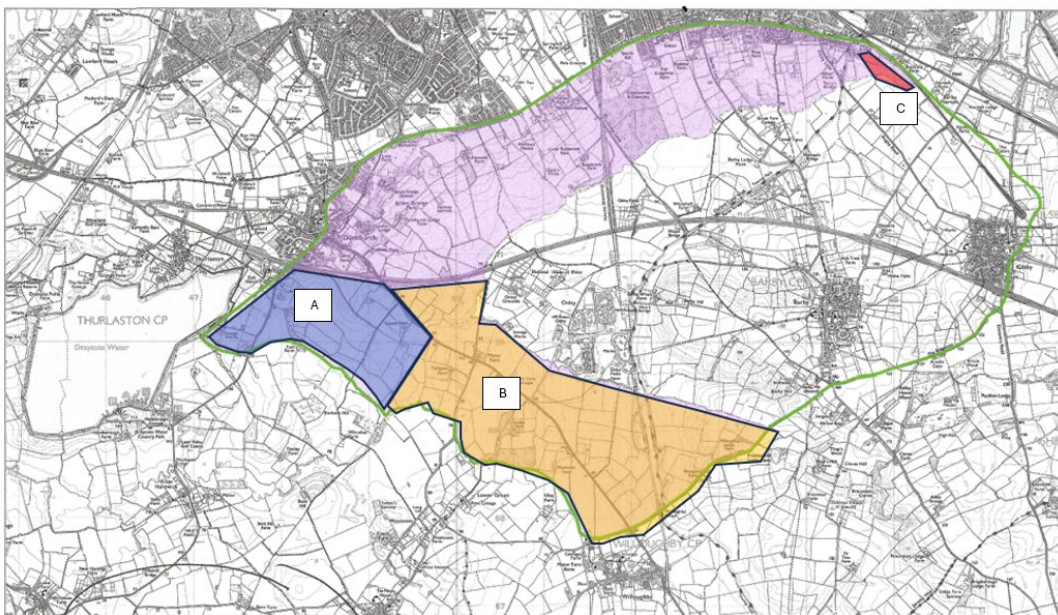


Image extracted from INCOLA report for Dunchurch Pools Marina 2026

Clarification to drafting of Policy EN3 to support clarity of policy and deliver of intended outcomes.

EN3.D

Why? to highlight the extensive elements that comprise the valley and add areas omitted.

Current

D. Protect and where possible enhance the landscapes and settings of: 'Bilton Grange' and 'Dunchurch Lodge' registered park and gardens; Rugby Diamond Wood Country Park; and Rainsbrook Cemetery and Crematorium.

Proposed

D. Protect and where possible enhance the landscapes and settings of: 'Bilton Grange' and 'Dunchurch Lodge' registered park and gardens; Rugby Diamond Wood Country Park; Great Central Way (South) Wildlife area, Rainsbrook Cemetery and Crematorium; *St Andrews Rugby Club, Hillmorton Vale community park; Rugby Town Football Club; Kilsby Lane Meadows wildlife areas; The Oxford Canal as a conservation corridor, amenity and leisure asset; Hillmorton Mound Sandpit wildlife area and area of Regional Geological Importance.*

EN3.F.

Why? To define the policy in the context of cumulative development, recognising the *historical context of unconsented development affecting the landscape baseline and poor enforcement action by RBC*

New drafting

Development will only be permitted in these areas when it will not have an significant adverse impact, either alone or in combination with other existing or proposed development, on the effectiveness of the Area of Elevated Landscape protection afforded the Rainsbrook valley, in it's purpose to protect the identity and distinctiveness of the Valley and its rural context beyond the urban boundary.

EN3.G.

Why? To provide clarity on the nature of adverse development to deliver the intended policy outcome in practical application.

New drafting

Development in the Rainsbrook Valley area, as identified on the policy maps, that diminish character, physical or visual landscape value or which extend beyond the urban fringe and have an urbanising influence, should be deemed as having a significant adverse impact on the effectiveness the area of Elevated Landscape Value.

EN3.H

Why? To establish a clear obligation to consider impact and allow the planning system to assess suitability. To prevent the creeping and unconsented development and recognising the poor enforcement record by RBC.

New drafting

Applicants proposing development that may have an adverse impact, alone or combined with other schemes, on The Rainsbrook Area of Elevated Landscape must demonstrate that they have considered this impact and have incorporated appropriate mitigatory measures into their proposal.

EN3. 5.9

Why? To define the purpose of policy EN3 in line with policy evidence and inspectors findings at appeals and examination in public.

New drafting

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 high degree of consideration in decision making. This sensitivity along the Valleys Northern scarp edge at the urban fringe are, at least in part, is derived from the distinct change from an Urban nature to a rural setting at the Settlement Boundary which is created by the lack of development beyond this boundary. Any development, even minimal development within areas of the scarp edge could diminish this landscape value, their identity and distinctiveness formed by this contrast, or contribute to the eventual sprawl and urbanisation of the Valley between Rugby and the Northern Villages of Northamptonshire.

Adverse development outside the area of EN3

Adverse Impact of other local development on sensitive visual receptors

We believe the potential adverse impact of development outside the designated area of policy EN3, should be material in the consideration of the planning balance and the plan should reflect this consideration.

We propose the following modification to Policy EN3 Criteria 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 minimised.’

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)

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

EN3 is fundamental to protection of the Valley and Hillmorton and Paddox wards. To protect the environment and amenity and to limited ongoing over development and stop the sprawl of DiRFT. This issue was identified as a key and supported by 95% of residents in our surveys. There is considerable new and relevant data, which we would like to share, which has not been considered by RBC in their assessments. This data does not change the outcome for EN3 but provides greater support which we believe should be considered as the basis for adopting EN3 and strengthening it. The drafting of EN3 lacks the clarity required by the NPPF and may fail in its application to deliver the intended policy outcome. Hillmorton Voice has championed the adoption of Policy EN3 for Rugby, and we wish to support its improvement and adoption.

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.

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

Name or Organisation: **Hillmorton Voice Residents Association**

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

Local Plan Paragraph		Local Plan Policy	EN5	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	x
(3) complies with the Duty to co-operate	Yes	X	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.

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To be read with additional document submitted.

- *HV/R19/001 – Hillmorton Voice Representation*
- *HV/R19/002 - Basis for representation on behalf of Residents.*

We support Policy EN5 and propose the following amendment to ensure soundness, support NPPF guidance and the value of connected habitats formed as stepping stones to improve biodiversity.

The Hillmorton area of policy EN3 includes many wildlife and habitat areas, forming a “defacto” wildlife corridor. This was recognised in the 2019 local plan with a designation as green and blue infrastructure corridors. We believe NPPF 192 requires that - Habitats and biodiversity states that plans should “...protect and enhance biodiversity and geodiversity, plans should: Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, ... wildlife corridors and stepping stones that connect them”.

The local plan under examination has removed the Green and Blue infrastructure corridors covering Eastern Hillmorton and the Oxford Canal.

The Oxford Canal crosses the Valley and is a vital environmental corridor. Within West Northamptonshire it is formally designated as a conservation area. The canal has strong environmental value, offers significant amenity value as a linear park and contains historical assets including many grade ii listed structures and industrial heritage assets. The canal itself

also has considerable economic value as a tourist asset supporting associated marinas such as Hillmorton Wharf, Barby Wharf and Dunchurch Pools all within close proximity.

The canal itself while an amenity, an industrial heritage asset, containing listed structures and significant tourist and economic resources is not designated a conservation corridor. This position is at odds with the evidence-based assessment of WNDC for the very same body of water in the Rainsbrook Valley.

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.

Modifications proposed

That the Oxford canal and the scarp edge in Hillmorton is designated as a green/Blue Infrastructure corridor bringing forward the area and designation from the 2019 local plan.

That the Oxford Canal within Hillmorton should be designated as a conservation area and a wildlife corridor to mirror the assessment made by WNDC of this joint asset

EN5.15 – New clause - “Habitat connectivity is important to deliver nature recovery and avoid the fragmentation of gains at too small a scale. The council policy is that gains should focus on improving or developing landscape corridors or creating effective stepping stone sites.” - this is to align RBC policy with Warwickshire CC and best practice for nature recovery.

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:

The value of the Rainsbrook Valley and the Oxford canal in supporting BNG is not fully recognised. The adoption of policy EN3 has resulted in other designations being ignored and this may not support intended policy outcomes. The potential of the Rainsbrook Valley as defined by policy EN3 to deliver BNG as anticipated in policy EN5 should be explored further. Such an opportunity will allow Hillmorton Voice to highlight many valuable parts of the landscape that have been overlooked to be considered. This is a real opportunity to clarify this policy and align it with Cross Boundary parties and County Council policy.

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.

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

Name or Organisation: **Hillmorton Voice Residents Association**

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

Local Plan Paragraph		Local Plan Policy	I5	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.

To be read with additional document submitted.

- HV/R19/001 – Hillmorton Voice Representation
- HV/R19/002 - Basis for representation on behalf of Residents.

Policy I5 designates land for a prospective rail station connected to the West Coast Main Line; however, this allocation is at odds with the principal supporting policy EN3. The designated area overlaps a regionally recognised geological site (Hillmorton Sandpit), which also serves as a potential wildlife protection zone.

The currently approved station follows a parkway model, intended to connect to the Northampton Branch line, with planning consent contingent on no induced traffic. Should future development proceed with this enlargement on the Main Line, we believe this plan or subsequent plans would lack soundness under current conditions.

- The proposal lacks necessary infrastructure support.
- Historical precedents suggest parkway stations generate substantial traffic, and this scheme would likely contribute to highway capacity issues.
- The WCC wide area network model does not incorporate an expanded station in its baseline or growth assessment. As a credible future scenario, safeguarding should have been addressed, meaning the effects of induced traffic remain unassessed.
- Implementation would directly contradict Policy EN3, rendering the allocation ineffective.

- There has been insufficient engagement with cross-boundary parties in WNDC, failing the duty to co-operate requirement.
- There is a credible risk of non-delivery, as developer support has not been secured after nearly ten years of concept development.
- Such a scheme would likely increase development pressures in an already over-developed area, with Hillmorton facing an imbalanced spatial strategy due to the scale of adjacent developments such as Houlton and DiRFT.

It is our assessment that the justification for this scheme has not been adequately demonstrated, raising concerns regarding its efficacy or feasibility. Consequently, reserving land for this purpose may compromise the soundness of the plan and its inclusion is considered premature. Our observations on policy EN3 further emphasize that the land proposed for safeguarding forms part of the Rainsbrook Valley, and existing evidence supports its inclusion within the area designated by policy EN3.

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.

Policy I5 as it relates to Rugby Parkway Station should be removed from the plan and the land should not be safeguarded. Instead, this land should form part of Policy EN3. The development of a station within the bounds of Hillmorton is a key local topic. We request the opportunity to speak on this matter.

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:

This policy poses a real risk of creep into the Rainsbrook Valley. Once building goes beyond the west coast main line, the context of the valley will be changed forever, Policy I5 contradicts core policies and lacks sufficient study, making it premature for inclusion. Its implementation could prompt further development in the Valley and is unnecessary, as policy EN3 (with corrected area) should offer adequate protection. Hillmorton Voice objects to this policy on these grounds. This policy is fundamental to the interest of Hillmorton.

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.

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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		
First Name		
Last Name		
Job Title (where relevant)		
Organisation (where relevant)	Hillmorton Voice Residents Association	
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address		

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

Name or Organisation: **Hillmorton Voice Residents Association**

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

Local Plan Paragraph		Local Plan Policy	S2	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	x
(3) complies with the Duty to co-operate	Yes	X	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.

Policy S2 – Strategy for Homes

To be read with additional document submitted.

- HV/R19/001 – Hillmorton Voice Representation
- HV/R19/002 - Basis for representation on behalf of Residents.

HV consider the overall targets for housing and the contribution of Windfall Developments to be two of many areas where the assessment are overly conservative. The areas where we see layers of unnecessary conservatism build into the requirements are.

- Housing targets are set based on government guidance and Office for National Statistics data, but a unique data anomaly for Rugby—a brief drop in salaries—artificially increases the housing target by about 30 dwellings per year. We believe this does not reflect the true data or the intentions of the Planning Policy Guidelines (PPG).
- The annual inclusion of windfall sites in the plan is comparatively low relative to historical figures. This approach appears excessively cautious and adds an implicit buffer beyond what is stipulated in Policy S2 1.22, which is set at 8.5%.
- Rugby's housing demand and employment circumstances are not fully accounted for in the Housing Needs Assessment. Since the pandemic, the rise of hybrid

working has seen, Rugby become a dormitory town drawing residents who work in cities like London, Milton Keynes, and Birmingham. Most current developments are costly new builds in SUE estates, which are less affordable compared to Rugby's existing housing stock. The ONS dataset overlooks this demographic because salaries are reported by employment location rather than residence, understating true average income and economic power in Rugby. These factors distort affordability assessments, leading to calls for more housing that may not address actual needs.

(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.

Modifications proposed to Policy S2

We support the amendment proposed by the Conservative party that the windfall sites number number be increased to a windfall development of 75 dwelling per year.

S2 1.21 – Cumulative burden of SW Rugby and Houlton

We propose an amendment to Policy S2 paragraph 1.21 to highlight the fact that the two SUE schemes Houlton and SW Rugby contribute respectively Houlton (26%) (30%) of required dwelling in the local plan.

Our proposed change is

“S.2 1.21...Much of the housing growth to meet this need is already committed through the Houlton, South West Rugby and Eden Park sites which will continue to be built out during the plan period.

Add: “...With specific reference to SW Rugby and Houlton we recognise the disproportionate burden that these wards contributing to the housing stock and the impact which they cause and will continue to experience. As such we propose that no further sites are allocated in these areas.”

S2 1.21 - Modify the buffer in policy S2 to a lower level to reflect the inbuilt buffer through application of hosing number policy in the context of Rugby described above.

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

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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:

The residents of Hillmorton and Paddox believe the scale of development in our area represents an imbalance in the Spatial Strategy which is not recognised in the local plan. We believe this is because this growth has been proposed at several previous Local Plan and then “banked and forgotten”. In addition, many sites and allocations are the result of cross-boundary developments in Northamptonshire and West Northamptonshire. The cross-boundary areas are treated as if a different country, never mind county, and limited dialogue has taken place with RBC of their effect. It is seeming lost on RBC and planners that over the last 2 decades the ward of Hillmorton (circa 4200 dwellings), has directly adjacent to it, had; 6600 houses allocated and industrial development at DiRFT of a scale equivalent to 18,000 houses, with 245 hectares in planning for Phase iv, twice the size of the original DiRFT phase I development equivalent to 7000-9000 more houses .

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.

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AI used (Chat GPT to ask the scale of DiRFT phase iv) and estimate the equivalent scale of the sites if there were houses rather than industrial.

Final

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.

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

Name or Organisation: **Hillmorton Voice Residents Association**

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

Local Plan Paragraph		Local Plan Policy	S3	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes		No	x
(3) complies with the Duty to co-operate	Yes	x	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.

To be read with additional document submitted.

- HV/R19/001 – Hillmorton Voice Representation
- HV/R19/002 - Basis for representation on behalf of Residents.

S3 – Strategy for Employment Land

We believe the amount of employment land exceeds local needs because the assessment relies mainly on West Midlands data and restricts its scope. This overlooks the borough's three major logistics areas, whose development is largely ignored. In Hillmorton's context, DiRFT directly impacts the area, with up to 25% of employees commuting via Ashlawn and Hillmorton/Crick roads. Employment provided by DiRFT, entirely local to Rugby, should be acknowledged, especially with further development planned for DiRFT Phase IV and beyond.

S3.1.25 – Quality of employment with development plans supported

We support a strategy offering varied unit sizes to encourage mixed uses, diversify the borough, and lessen reliance on storage, logistics, and the associated lower-income jobs. The current allocations seem likely to result in large B8 warehouse developments, as shown by recent projects and proposals. This approach does not provide high-value employment for Rugby's residents or meet RBC's Economic Strategy goals. Additionally,

the plan fails to account for automation, which will render many roles obsolete—a trend already evident in similar facilities.

(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.

Modification Proposed to policy S3

Hillmorton sits close to the boundary of West Northamptonshire, Northamptonshire and reasonably close to Leicestershire. Planning has a poor record of dialogue between the authorities in these areas. This results in poor coordination, overlapping plans and poor appreciation of the combined effect of cross boundary plans. This is the case with this current plan We propose that RBC should be required to complete a Statement of Common Ground with Northamptonshire and West Northamptonshire District Council related to DiRFT. From this dialogue and the contribution of DiRFT we anticipate the employment land figures proposed by RBC could be lowered, having taken into account employment land provided for Rugby Town by DiRFT under the plans developed by WND. WND is currently in reg 18 consultation with submissions due in March 26, with a targeted submission to the Secretary of State by the end of 2026.

This is relevant to Hillmorton as we are the closest large population along with Houlton and Crick, that is directly impacted by DiRFT

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

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

Final

☐

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

☒

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

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

The scale, impact and effect on wellbeing of DiRFT is not recognised and cross boundary dialogue is substandard or absent. The position taken by RBC to choose higher volumes of warehousing (from a range they can consider) and ignoring the contribution of cross-boundary parties results in excessive land use and indeed places artificial stress on land availability for other uses such as housing in the Borough. Hillmorton is affected by DiRFT more than most areas of Rugby and therefore we wish to be part of the dialogue on policy S3 and the cross-boundary issues which have been largely overlooked.

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.

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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

Local
Plan
Policy

S4

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.

To be read with additional document submitted.

- HV/R19/001 – Hillmorton Voice Representation
- HV/R19/002 - Basis for representation on behalf of Residents.

We support the approach taken by Policy S4 and understand its necessity due to NPPF requirements and previous failures to allocate sites. Because these needs were not met, unconsented developments occurred as people ignored regulations. The future allocation of sites under Policy S4 is a positive step, fulfilling both legal obligations and the need to support Rugby Borough's diverse community. With sites now allocated, the Local Planning Authority should ensure strict enforcement against unauthorised development within these areas and act promptly when breaches occur. This will help restore public confidence, which has been shaken by past enforcement failures that often led to retrospective planning approval once developments were already established. Therefore, we propose amending Policy S4 to ensure soundness of the wider plan.

(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.

New sub paragraph

1.31 Recognising the allocations now made for sites under policy S4, any further sites, which are not consented, but developed nonetheless will be contested by the authority as a matter of course as if a mandatory obligation. Thus, waiving the local planning authority right under NPPF 60, where enforcement is discretionary.

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

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

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

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It is vital for fairness that adequate sites are allocated under policy S4. It is equally important that once this is done that enforcement is rigorously pursued for unconsented development. This is true whoever is the end user. This is relevant to Hillmorton as it is to any ward and maybe particularly so as we are concerned that site 40 may be developed for such as use, without consent. This is based on discussion in the

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

Name or Organisation: Hillmorton Voice Residents Association

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

Local Plan Paragraph		Local Plan Policy	S5	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.

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To be read with additional document submitted.

- HV/R19/001 – Hillmorton Voice Representation
- HV/R19/002 - Basis for representation on behalf of Residents.

We support policy S5 and its alignment with policy EN3 regarding Rainsbrook Valley, as well as the removal of sites 40 and 334, which fall outside boundaries defined in S5.A. To make the Policy sound, S5 needs clearer interaction with EN3 Rainsbrook and I5 Railways. We suggest amending S5 to clarify required actions under NPPF 16.d.

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

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Modification Proposed

New clause – “this policy it to be read in conjunction with policy EN3 which seeks to protect the Rainsbrook Valley area of elevated sensitivity.”

New clause – “Policy I5 is not intended to convey a presumed development right that would contradict this policy, paragraph A nor the intention of Policy EN3 to provide greater protection to the Rainsbrook Valley.”

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

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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:

Hillmorton is already overdeveloped. Building a station could increase development pressure. We argue that policy EN3 should be the main guideline for dealing with these concerns, and policy I5 should not protect additional land.

Final

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.

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

Name or Organisation: **Hillmorton Voice Residents Association**

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

Local Plan Paragraph		Local Plan Policy	S6	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes	X Housing	No	X Warehouses
(3) complies with the Duty to co-operate	Yes	X	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.

To be read with additional document submitted.

- HV/R19/001 – Hillmorton Voice Representation
- HV/R19/002 - Basis for representation on behalf of Residents.

We support the overall balance for housing proposed between rural (75%) and urban (25%) mirroring where the boroughs population lives. This is underpinned by the contribution (over 50%) that Houlton, Eden Park and SW Rugby make to the allocations in policy S6. We support the use of “brownfield land first policy” and encourage further work in the area both within Rugby Town and other areas.

This approach is seen a justified and fair – it delivers balance, it opens up a range of site sizes, and it allows houses to be delivered at pace which cannot be the case with larger strategic sites where lead times are widely understood to be 5-10 years, such as Lodge Farm.

Rugby Borough has for many years relied almost entirely on urban extensions to deliver the majority of its growth making the development of the borough centric to Rugby. The growth has also been far more than is justified by evidence exceeding the evidence-based Local plan by circa 50%. This has placed most of the burden on areas such as Eden Park and Houlton and as we move forward SW

Rugby. Meanwhile the Villages to west of the borough have largely been untouched, yet villages such as Dunchurch are now bearing a disproportionate burden, as Hillmorton has from this approaching for a decade. This has resulted in a spatial imbalance which leads to some perverse outcomes – and is not justified or effective.

While the villages are noted as having issues of sustainability such as lack of healthcare, travel distances and access to schools we now see this spatial imbalance having created this same and even greater problems in Hillmorton. We have no GP, we are the furthest from UHCW hospital, our schools are oversubscribed and our children will have to travel to Avon Valley, Bilton and Harris schools. Shorter distances than many of the villages to the west but longer journey times due to the urban nature of the route. The villages would argue they are green belt, which is true. But in the main this is to stop coalescence and not to preserve land per-se. The real argument is “can you not just dump this all on Rugby town as we have for decades, it seemed to work and we were then not affected.” Well - It didn’t work - Houlton has had devastating effects on Hillmorton and the build is only 1/3 complete. For a development to be a SUE it needs to be sustainable and this has to more than just sustainability of the urban extension but also for the effect it has on its neighbours.

With the housing demand to be met and brown field and easy locations exhausted, we believe the policy of dispersal and a balance of development across the borough is evidence backed. It is justified and is the only plan that is effective to deliver the number of houses required at the pace needed.

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Our proposed change is a new clause

S6. 1.35

Much of the housing growth to meet this need is already committed through the Houlton, Southwest Rugby and Eden Park sites which will continue to be built out during the plan period.

With specific reference to Hillmorton and the adjacent Houlton site, we recognise the disproportionate impact that this wards experiences through Houlton’s contributes to the housing stock. As such further allocations in Hillmorton would lead to an unbalanced spatial strategy and should not be made.”

(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.

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☐

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

☒

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

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

The residents of Hillmorton and Paddox believe the scale of development in our area represents and imbalance in the Spatial Strategy which was not recognised in the last local plan. We believe this is because this growth has been proposed at several previous Local Plan and then “banked and forgotten”. In addition, many sites and allocations are the result of cross-boundary developments in Northamptonshire and West Northamptonshire. The cross-boundary areas are treated as if a different country, never mind county, and limited dialogue has taken place with RBC of their effect, even at this plan. In the last plan it was seeming lost on RBC under the previous administration and planners that over the last 2 decades the ward of Hillmorton (circa 4200 dwellings), has directly adjacent to it, had; 6600 houses allocated and industrial development at DiRFT of a scale equivalent to 18,000 houses, with 245 hectares in planning for Phase iv, twice the size of the original DiRFT phase I development and equating in size to a further 7000-9000 houses.

The decision not to allocate further mass housing in Hillmorton is fully supported as a vital component in recognising the spatial imbalance and making this plan sound.

However, the onslaught of warehousing continues and should be re examined as it is debatable if it is at all justified by the evidence.

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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.

AI used (Chat GPT to ask the scale of DiRFT phase iv) and to estimate the equivalent housing volumes for the DiRFT sites as a reference of scale.

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

Name or Organisation: **Hillmorton Voice Residents Association**

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

Local Plan Paragraph		Local Plan Policy		Policies Map	
Site ID	338				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes	X	No	
(3) complies with the Duty to co-operate	Yes	X	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.

To be read with additional document submitted.

- HV/R19/001 – Hillmorton Voice Representation
- HV/R19/002 - Basis for representation on behalf of Residents.

We support the continued allocation of site 338 Land on Crick Road adjacent to Houlton. We consider this site sustainable given the large scale of Houlton adjacent to the site and that the development is largely beyond the ridge that forms the limit of the Rainsbrook Valley Northern Scarpe edge.

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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.

We believe a modification to policy EN3 is required so sites such as this do not have an adverse impact of sensitive visual receptors, undermining the intention of policy EN3. The planning balance should consider this and determine the effect of eaves height, landscaping and massing overall on the visual receptor across the Rainsbrook Valley.

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.

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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		Local Plan Policy	CL1	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.

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- HV/R19/001 – Hillmorton Voice Representation
- HV/R19/002 - Basis for representation on behalf of Residents.

Policy EN3 provides clarity of the landscape of the Rainsbrook Valley. The landscape considered to be of high value. We believe there is an equal case for clarity around potential development in CL1 for renewable energy development in the area of policy EN3 as there is for Greenbelt. Both being landscapes where s strategy seeks to apply a great focus on development control.

(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.

Modification to CL1. B

Original

Proposals which constitute inappropriate development in the Green Belt need to demonstrate very special circumstances which outweigh the harm to the Green Belt. In assessing whether very special circumstances exist, regard will be had to.....

Proposed

Proposals which constitute inappropriate development in the Green Belt, [or the area defined in Policy EN3](#), need to demonstrate very special circumstances which outweigh the harm to these areas. In assessing whether very special circumstances exist, regard will be had to...

Current

2.5 Renewable energy development proposals will be considered against other relevant policies of this plan including EN1 (Biodiversity and geodiversity protection), EN2 (Landscape protection), EN8 (Environmental protection and amenity), and D4 (Historic environment). Impacts on the amenity of neighbouring uses must be assessed to be acceptable in line with policy EN8. A small or medium wind turbine means a turbine that is not more than 40 metres in height.

Proposed

2.5 Renewable energy development proposals will be considered against other relevant policies of this plan including EN1 (Biodiversity and geodiversity protection), EN2 (Landscape protection), [EN3 Rainsbrook Area of elevated landscape sensitivity](#), EN8 (Environmental protection and amenity), and D4 (Historic environment). Impacts on the amenity of neighbouring uses must be assessed to be acceptable in line with policy EN8. A small or medium wind turbine means a turbine that is not more than 40 metres in height.

(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:

The development of such schemes would have a significant effect on the landscape of Rainsbrook and we wish to speak on this should the need arise.

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.

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