

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*

2. Agent's Details (if applicable)

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

Title	<input type="text" value="Mr"/>	<input type="text" value="Mrs"/>
First Name	<input type="text" value="Joseph"/>	<input type="text" value="Eleanor"/>
Last Name	<input type="text" value="Oliver"/>	<input type="text" value="Lovett"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate Director"/>
Organisation (where relevant)	<input type="text" value="J Marine Ltd"/>	<input type="text" value="Claremont Planning
Consultancy Ltd"/>
Address Line 1	<input type="text" value="[REDACTED]"/>	<input type="text" value="[REDACTED]"/>
Line 2	<input type="text" value="[REDACTED]"/>	<input type="text" value="[REDACTED]"/>
Line 3	<input type="text" value="[REDACTED]"/>	<input type="text" value="[REDACTED]"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="[REDACTED]"/>	<input type="text" value="[REDACTED]"/>
Telephone Number	<input type="text"/>	<input type="text" value="[REDACTED]"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="[REDACTED]"/>

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

Name or Organisation: Eleanor Lovett – Claremont Planning

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

Paragraph	Strategy	Policy	S1; S2; S5; S6	Policies Map	
Site ID					

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.

See Section 3 of the attached report.

(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.

N/A

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

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

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

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

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

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

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

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

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

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

Name or Organisation: Eleanor Lovett – Claremont Planning

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="E3"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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

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

See Section 4 of the attached report.

(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.

See 4.1.5 of the attached report for proposed modifications to this policy.

(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)?

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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:

To provide further clarity regarding the concerns of J Marine and participate in the discussion regarding this matter.

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.

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

Name or Organisation: Eleanor Lovett – Claremont Planning

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="EN3"/>	Policies Map	<input type="text"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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

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

See Section 5 of the attached report.

(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.

See proposed modifications in 5.2.10 of the attached report.

(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)

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To provide further clarity regarding the concerns of J Marine and participate in the discussion regarding this matter.

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

Name or Organisation: Eleanor Lovett – Claremont Planning

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

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<input checked="" type="checkbox"/>
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

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

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

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

See Section 5 of the report and Appendix 3.

(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.

See proposed designation extent identified on the Plan provided at Appendix 3 of the attached report.

(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:

To provide further clarity regarding the concerns of J Marine and participate in the discussion regarding this matter.

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

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

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The Planning Inspectorate's privacy notice can be accessed here:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>



**WRITTEN REPRESENTATIONS TO
RUGBY BOROUGH COUNCIL**

**LOCAL PLAN REGULATION 19
PROPOSED SUBMISSION VERSION
CONSULTATION**

**ON BEHALF OF J MARINE LIMITED
(DUNCHURCH POOLS)**

March 2026

Our Ref: CLR380

Claremont Planning Consultancy Ltd

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] [REDACTED]
[REDACTED]

QUALITY MANAGEMENT

Prepared and Authorised by:	Eleanor Lovett / Katherine Else
Date:	March 2026
Project Number/Doc Reference:	CLR380 / 2

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EXECUTIVE SUMMARY

These representations are submitted on behalf of J Marine Ltd in response to the Rugby Borough Local Plan Regulation 19 Publication Version consultation. These representations should be read alongside the response provided to the Regulation 18 consultation in 2025.

J Marine operates Dunchurch Pools, an inland Marina located on the eastern edge of Rugby Borough. The Marina, along with the Oxford Canal, is a key tourism resource for the Borough and a nationally significant inland waterways facility. Dunchurch Pools is also a significant local employer.

The representations confirm that J Marine continues to support the approach taken in preparing the Plan, as well as the identified Plan objectives, including supporting diversification of the Rugby economy; reducing carbon emissions; raising design standards and facilitating a greener and more diverse borough. J Marine specifically also support the overall strategy and approach to housing, recognising the Plan Period to 2042 is consistent with national policy and the overall level of housing will be sufficient to meet these needs with an appropriate buffer.

However, the representations also identify opportunities where some policies in the Plan could be strengthened through modifications. This includes:

Economy –

- Policy E3 – should be modified so that it is consistent with and reflects national policy; The proposed modifications to the policy text are set out as follows:

The following forms of development are acceptable in principle both in and outside of rural settlement boundaries, subject to their compliance with other policies of this plan (including Green Belt policy):

- i. ~~small-scale~~ tourism, visitor accommodation and leisure-based uses including sport and recreation;*
- ii. small-scale expansion of existing holiday caravan/chalet sites;*
- iii. garden centres and nurseries;*
- iv. equine and equestrian development;*
- v. agricultural and forestry buildings;*
- vi. new canal-based facilities, but, where such facilities are outside of settlement boundaries, not including permanent residential moorings.*

Proposals within paragraph A of this policy must be of an appropriate scale and type for their location.

New visitor accommodation outside settlement boundaries must be demonstrated to be viable through a credible business case.

Conversion of visitor accommodation outside of settlement boundaries to permanent residential use will not be supported.

Diversification of farms will be permitted where:

- i. best and most versatile agricultural land is avoided;*
- ii. new uses are subservient in scale to the main agricultural use; and*
- iii. existing buildings are used if possible.*

Proposals for new canal-based facilities should be directed to locations within or adjacent to defined settlements to ensure that these are sustainably located.

Environment –

- Policy EN2 – the evidence base has taken a narrow view of landscape sensitivity, failing to consider the wider context; and
- Policy EN3 – the proposed designation and policy should be modified to ensure that it is effective and achieves its purpose.

The proposed modifications to the designation area are illustrated on the Plan at **Appendix 3**, whilst the proposed changes to the policy text are as follows:

- 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 designated landscape are avoided.*
- B. *[no change proposed]*
- C. *Safeguard important views within, ~~and~~ across, and beyond the Rainsbrook Valley and minimise adverse visual impacts on the edge escarpment.*
- D. *[no change proposed]*
- E. *[no change proposed]*

In support of the proposed modifications to Policy EN3, these representations are supported by an assessment of Landscape Sensitivity, at **Appendix 2**, that has been undertaken to complement the Council's 2025 evidence and concludes that the whole Rainsbrook Valley is a landscape of high sensitivity.

Finally, the representations provide further detail in response to the consideration of Site 73 – Lodge Farm as a reasonable alternative. Whilst it is recognised that the Council does not intend to allocate the site through this Plan, further details in respect of J Marine's concerns regarding the site are provided, with reference to the relevant parts of the evidence base. These representations reiterate concerns raised through the Regulation 18 response, whilst further identifying concerns in respect of matters such as highways, infrastructure, viability, landscape, biodiversity, and heritage that would result in adverse impacts should a development of the scale of Lodge Farm be brought forward in this location. This is notwithstanding the impact that the development would have on Dunchurch Pools as an important tourist destination and established local business, which has developed due to its tranquil Rainsbrook Valley landscape setting. The cumulative effect of these adverse impacts outweigh any potential benefits, and it is therefore requested that the site be dismissed as a reasonable alternative.

1 INTRODUCTION

1.1 Background

1.1.1 Claremont Planning is instructed by J Marine Limited, to prepare representations to the Rugby Borough Local Plan, Regulation 19 Publication Version Consultation. These representations relate to J Marine's operations at Dunchurch Pools (Marina), located south-east of Dunchurch on the Oxford Canal, on the eastern edge of the Rugby Borough administrative area and straddling the boundary with West Northamptonshire District.

1.1.2 These representations build on the response provided to the Regulation 18 consultation in 2025, which generally supported the Council's approach, but suggested modifications to certain policies. In addition to the Plan itself, the Regulation 18 representations provided a detailed overview of the Marina, including its planning history, current offering (moorings, supplies, brokerage, boatyard, café and public access to the countryside), future aspirations and the role it plays as a local employer and nationally significant tourist destination. Those representations also considered the evidence base published alongside the Plan, and in particular the assessment of reasonable alternatives including Site 73 – Lodge Farm.

1.2 Substance of Representations

1.2.1 In respect of the emerging Plan, these representations confirm that J Marine continues to support the approach that the Council has taken in regards to the Publication draft. The strategy and approach to housing in particular are strongly supported and considered to align positively with national policy and guidance.

1.2.2 J Marine, however, considers that there remains a number of areas where it is considered the Plan could be enhanced. These include:

- Economy –
 - Policy E3 – should be modified so that it is consistent with and reflects national policy;
- Environment –
 - Policy EN2 – the evidence base has taken a narrow view of landscape sensitivity, failing to consider the wider context; and
 - Policy EN3 – the proposed designation and policy should be modified to ensure that it is effective and achieves its purpose.

1.2.3 The representations will then go on to consider specifically the matter of Site 73 – Lodge Farm, reaffirming the concerns previously identified in respect of this site being considered as a reasonable alternative in the evidence base that supports the Plan. A range of factors will be considered, demonstrating the adverse impacts that would arise should the Council reconsider the site for inclusion in the emerging Plan. It should, therefore, be concluded that the adverse impacts are such that the site should not be given further consideration as a reasonable alternative, nor should it form part of the Council's strategy for the emerging Plan as it is not necessary for the Plan to be sound.

2 DUNCHURCH POOLS

2.1 Dunchurch Pools Marina

- 2.1.1 Dunchurch Pools Marina represents a recently constructed inland marina, which opened in 2018. The Marina straddles the administrative boundary of Rugby Borough and West Northamptonshire District. The Marina's location is confirmed in the site location plan provided at **Appendix 1**.
- 2.1.2 Further details regarding the Marina, including its planning history, current offering (moorings, supplies, brokerage, boatyard, café and public access to the countryside), future aspirations and the role it plays as a local employer and nationally significant tourist destination were set out in Chapter 2 of the Representations submitted to the Regulation 18 Local Plan consultation on behalf of J Marine Ltd.
- 2.1.3 These representations seek to reinforce the comments and concerns raised through those representations, highlighting the importance of the Marina as an asset for the Borough, but a destination that needs to be considered and respected alongside the Borough's development aspirations.

3 LOCAL PLAN – OBJECTIVES, PRIORITIES & STRATEGY

3.1 Objectives

- 3.1.1 J Marine Ltd continues to support the approach the Council has taken in respect of the emerging Local Plan, recognising how these objectives will shape growth in the Borough in a sustainable way, consistent with the objectives of the National Planning Policy Framework (the Framework). In particular, the objectives to support the diversification and growth of Rugby's economy; to reduce carbon emissions and adapt to climate change; to raise design standards; and to facilitate a greener and more biodiverse Borough are supported. It is maintained that the Plan itself could better support these objectives through modifications to the content of policies, which will be detailed in these representations.

3.2 Strategy – S1 Settlement Hierarchy & S2 Strategy for Homes

- 3.2.1 The proposed settlement hierarchy and strategy is supported in principle, noting that this continues to identify Rugby town as the main focus for new homes and employment, with lower order settlements proposed to play a supporting role commensurate with their scale and facilities on offer.
- 3.2.2 The key change between the Preferred Options draft and the Submission version is a reduction in the level of housing that is being planned for, from 12,978 homes previously to 10,812 new homes as per the Submission draft. This change results from bringing forward the end of the Plan Period to 2042, rather than 2045 as previously proposed; along side a small increase to the number of homes per annum being planned for. In respect of the housing requirement, this is due to an update to the Government's standard method calculation for the Borough, and it is recognised that the Council should plan for this level of housing as a minimum. The overall housing requirement also continues to incorporate a buffer, albeit slightly reduced, but still providing an additional 8.5% over the minimum housing requirement for the Plan Period. This provides flexibility and assurance that the Council is planning to at least meet the minimum housing requirements, consistent with Paragraph 35 of the Framework.
- 3.2.3 In other's representations to the previous consultation, it was suggested that a longer plan-period would be appropriate to align with other Development Plans being prepared elsewhere. However, it is not considered that this is necessary for Rugby, and the proposed Plan Period to 2042 is supported by J Marine. The Council intends for the Plan to be submitted for examination later in 2026 and this consultation forms a key milestone in achieving this, with adoption expected in 2027. This is consistent with the 2024 Local Development Scheme, as well as the Government's requirements for Plans prepared in accordance with the previous legislation to be submitted for examination by the end of 2026 at the latest. This fulfils the requirements of Paragraph 22 of the Framework that requires strategic policies to look ahead over a minimum 15-year period from adoption.
- 3.2.4 In light of the forthcoming changes to the organisation of authorities in Warwickshire, it is not considered appropriate to extend the plan period substantially beyond that 15-year requirement

as there is uncertainty regarding the scale and distribution of needs going forward. Extending the Plan Period would also have wider ramifications for other development needs beyond those of housing, that would require the Council to prepare additional evidence and assessment, and jeopardise the likelihood of meeting the deadline for submission of a Plan this year under the former plan-making system. It is therefore considered that the Plan Period and Housing numbers proposed are appropriate and consistent with the plan-making requirements of national policy and legislation, representing a sound approach.

3.3 S5 – Countryside Protection

3.3.1 J Marine supports Policy S5 as it will restrict development outside settlement boundaries, unless it accords with other policy. It is important that the Plan provides support for development that is appropriate in rural locations, and this policy alongside other policies such as E3 Rural Economy facilitate this. Along with Policy S1, this will assist in directing the majority of new development to the most sustainable locations in the Borough, and this is supported.

3.4 S6 – Residential Allocations

3.4.1 J Marine continues to support the Council's approach to residential allocations, supporting the continued focus on Rugby town itself. As identified through previous representations, J Marine particularly supports the Council's decision not to allocate the promoted Site 73 – Lodge Farm as a new settlement through the emerging Local Plan. This is considered in further detail in Chapter 6 of this report.

4 ECONOMY

4.1 E3 – Rural Economy

- 4.1.1 The inclusion of a policy relating to the Rural Economy is supported by J Marine Ltd as identified through previous representations. In the response to the Regulation 18 consultation, a detailed overview of the significant role that J Marine and Dunchurch Pools Marina play within Rugby Borough and the wider tourism industry is provided. Importantly, there is an opportunity for this to increase in the future, but it needs to be supported by a positive policy context, which the emerging Local Plan forms a key part of.
- 4.1.2 As set out in the response to the Preferred Options consultation, J Marine is concerned that the policy as currently drafted could restrict future development proposals for expansion of the facilities at the Marina. The Council responded to the representations in the Consultation Statement (December 2025) identifying that tourism development is encouraged by the policy, with the only exception permanent residential moorings. Officers disagreed that the policy is too restrictive and inconsistent with paragraph 88 of the Framework, noting that A(i) and (ii) refer to scale and aim to ensure that development is appropriate to the setting.
- 4.1.3 Paragraph 88 of the Framework establishes that planning policies and decisions should enable: a) sustainable growth and expansion of all types of businesses in rural areas...; and c) sustainable rural tourism and leisure developments which respect the character of the countryside. Despite the representations submitted previously highlighting this, proposed Policy E3 in the Submission version of the Plan continues to identify in part A)i) '**small-scale** tourism, visitor accommodation and leisure-based uses'; along with vi) 'new canal-based facilities'. It is unclear why the Council considers the reference to small-scale is necessary in part i), given that part B of the policy goes on to identify that proposals must be of an appropriate scale and type for their location. It is considered that in order to align with the requirements of Paragraph 88 to support the sustainable growth and expansion of all types of businesses in rural areas, part A)i) should not specify small-scale, and instead should be open to supporting all proposals provided that they are appropriate for their location.
- 4.1.4 The previous representations also identified that part vi) of the policy should be amended to direct new canal-based facilities to locations within or adjacent to settlements, to ensure that the Plan is directing new developments to the most sustainable locations. The Framework at Paragraph 91 directs new leisure developments as an example of main town centre uses to existing centres, confirming the sequential test and that only if suitable sites are not available should out of centre sites be considered. Accordingly, the Council should recognise that this should be relevant to new leisure developments including canal-based leisure facilities, where these should be directed to the most sustainable locations. It is recognised that there are location-specific factors that influence where canal-based facilities can be delivered, however this should be mindful of other policy requirements such as those for main town centre uses and the need to promote sustainable patterns of development.

Proposed Modifications to Policy E3 – Rural Economy

- 4.1.5 It is suggested that the following modification should be introduced to ensure the effectiveness of Policy E3:

- A. *The following forms of development are acceptable in principle both in and outside of rural settlement boundaries, subject to their compliance with other policies of this plan (including Green Belt policy):*
- iv. ~~small-scale~~ *tourism, visitor accommodation and leisure-based uses including sport and recreation;*
 - v. *small-scale expansion of existing holiday caravan/chalet sites;*
 - vi. *garden centres and nurseries;*
 - vii. *equine and equestrian development;*
 - viii. *agricultural and forestry buildings;*
 - ix. *new canal-based facilities, but, where such facilities are outside of settlement boundaries, not including permanent residential moorings.*
- B. *Proposals within paragraph A of this policy must be of an appropriate scale and type for their location.*
- C. *New visitor accommodation outside settlement boundaries must be demonstrated to be viable through a credible business case.*
- D. *Conversion of visitor accommodation outside of settlement boundaries to permanent residential use will not be supported.*
- E. *Diversification of farms will be permitted where:*
- x. *best and most versatile agricultural land is avoided;*
 - xi. *new uses are subservient in scale to the main agricultural use; and*
 - xii. *existing buildings are used if possible.*
- F. *Proposals for new canal-based facilities should be directed to locations within or adjacent to defined settlements to ensure that these are sustainably located.*

5 ENVIRONMENT

5.1 EN2 – Landscape Protection

5.1.1 As identified in previous representations, J Marine is concerned that the Council had not taken a wide enough view when considering the landscape sensitivity. The evidence base for the consultation confirms the Council continues to rely on the January 2025 Landscape Character Assessment which appears to consider the Borough in isolation without considering how the Landscape Character Areas extend beyond the borough boundary.

5.1.2 However, it is recognised that where the Council has considered large sites specifically, including in post-mitigation assessments in the December 2025 Addendum, the Council has recognised the impact of development on long distance views, which include those extending beyond the Borough boundary. This suggests that consideration of these wider implications has informed the Council's consideration of potential sites which is supported, although it is important that this is demonstrated to have informed the Plan as a whole and, in particular, designations such as that proposed through EN3, considered in detail below.

5.2 EN3 – Rainsbrook Valley

5.2.1 Policy EN3 is a new policy that features in the Submission version of the Plan but was not previously included. The insertion of this policy, and the associated designation proposed on the Policies Map, is supported by J Marine. However, as will be explained through these representations and the supporting material at Appendix 2, it is considered that the Council should extend the proposed designation to encompass additional areas of high sensitivity that would also benefit from this policy.

5.2.2 It is understood that the purpose and intention of Policy EN3 is to protect the Rainsbrook Valley as an area of elevated landscape sensitivity. This is in response to a Sensitivity Assessment (2025) that confirms this area should be afforded a higher degree of consideration in decision making, as recognised in Paragraph 5.7 of the draft Plan. As presented in Appendix 2, however, the Rainsbrook Valley extends beyond the area which has been assessed in that Sensitivity Assessment and that designated on the policies map. Importantly, the area where there is heightened sensitivity is not restricted to the portion of the Rainsbrook Valley included in the proposed designation, but rather extends to the whole Rainsbrook Valley. In order that the designation is able to provide the protection necessary to safeguard the landscape of the Rainsbrook Valley as a whole, the Council is strongly encouraged to revisit the scope and extent of the designation. This is necessary to ensure that Policy EN3 and therefore the Plan is capable of being found sound, in that it is justified and based on proportionate evidence.

5.2.3 The proposed designation has been supported by a specific Landscape Sensitivity Assessment (2025), which justifies affording the assessment area, including the designated area, a higher degree of consideration in decision making, as recognised in the supporting text. This provides a robust and extensive assessment of landscape sensitivity; recognising that sensitivity is a combination of a landscape's value and its susceptibility to change. Landscape value has been assessed against a range of indicators including heritage; condition; distinctiveness; associations; recreation; perceptual and functional. The landscape's susceptibility to change has been considered relative to a residential development of 50+ houses. This methodology and the

assessment undertaken is recognised as robust, however, the concerns of J Marine relate to the scope of the assessment and the area considered. It is considered that the Rainsbrook Valley, and the area of sensitivity, extends beyond the designation area.

- 5.2.4 In the assessment presented at **Appendix 2** of this report, Incola Landscape Planning has sought to identify the full extent of the Rainsbrook Valley. This has demonstrated that the valley extends southwards from the area assessed in the Council's Landscape Sensitivity Assessment (2025) to a line between Toft Hill in the west, and Barby Hill in the east. A comparative landscape sensitivity assessment has been undertaken, which has concluded that the additional area of the Rainsbrook Valley that was not assessed in the Council's evidence is of the same high landscape sensitivity as the area that was assessed. Furthermore, that additional area within the southern part of the valley makes a strong contribution to cultural heritage, distinctive and perceptual aspects of the landscape. The Incola assessment also confirms that the additional area is similarly highly susceptible to the effects of major development (of 50 dwellings or more).
- 5.2.5 The conclusions of the assessment presented at **Appendix 2** confirm that the area of sensitivity associated with the Rainsbrook Valley extends beyond that which is proposed to be designated through Policy EN3. Accordingly, if the purpose of Policy EN3 is to protect the Rainsbrook Valley, the Council should revisit the extent of the proposed designation and extend this to additionally include that area of the valley that extends to the south as defined by the Incola assessment, and shown on the plan provided at **Appendix 3** of this report.
- 5.2.6 Alongside these representations, it should be noted that J Marine will also be recommending that West Northamptonshire Council through its emerging Local Plan considers designating the remainder of the Rainsbrook Valley area that lies beyond the Borough's boundary, in recognition that this also is an area of high sensitivity that should be afforded additional protection, as proposed through Policy EN3.
- 5.2.7 Notwithstanding the concerns regarding the scope of the assessment and extent of the designation, J Marine would also like to provide some commentary on the contents of Policy EN3. In respect of Criteria A, consideration should be given to development that would fall outside of the designated area defined on the policies map, but that could adversely impact the setting of the designation and the associated views. Currently, this would not be affected by criteria A, and therefore consideration should be given to whether there should be a secondary clause that identifies that, where proximate development would influence the designated area, consideration should be given to minimising the potential for impact. A suggested modification to criteria A to incorporate this is presented below.
- 5.2.8 In respect of Criteria C, a minor tweak to the wording of this is proposed as set out below. This is to ensure that the policy protects the valley as a whole, recognising that important views will extend beyond the designation.
- 5.2.9 J Marine supports the proposed Criteria B, and D, but particularly supports the recognition of the assets referenced in criteria E. The Great Central Walk, the Oxford Canal, and the wider Public Rights of Way Network represent important assets for the locality, and it is important for policy and designations to recognise the value of these for the Borough.

Proposed Modifications to Policy EN3

5.2.10 It is suggested that the following modification should be introduced to ensure the effectiveness of Policy EN3 and the associated Rainsbrook Valley designation:

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 designated landscape are avoided.*

B. [no change proposed]

C. *Safeguard important views within, ~~and~~ across, and beyond the Rainsbrook Valley and minimise adverse visual impacts on the edge escarpment.*

D. [no change proposed]

E. [no change proposed]

5.2.11 The proposed extent of the Rainsbrook Valley Landscape of Elevated Sensitivity is presented at **Appendix 3**, which would encompass the entirety of the Rainsbrook Valley that lies within Rugby Borough.

6 LODGE FARM

6.1 Introduction

6.1.1 Whilst it is recognised that the Council has determined that Site 73 – Lodge Farm should not be proposed to be allocated in the emerging Plan as confirmed through the Submission draft, J Marine wanted to include within these representations further commentary to support the representations on this point made during the Regulation 18 consultation in 2025. Critically, these representations seek to confirm support for the Council’s approach to the Plan and the decision to focus growth in other, more sustainable locations. It is contended that through this Plan there is no requirement for Site 73 to be allocated.

6.1.2 The Council’s summary of the response to the Preferred Options in the Consultation Statement (December 2025) included a specific consideration of omission sites, including Lodge Farm. This recognised the significant level of objection to the potential for development at Site 73 – Lodge Farm, despite the site not being proposed to be allocated in the Plan, but continuing to be considered through the evidence base as a ‘reasonable alternative’. Importantly, the Consultation Statement demonstrates the strength of opposition to Site 73, through the submission of 240 representations, alongside 2,538 hard copy letters. It is also identified that these objections have been submitted on a range of issues, confirming that despite the continued promotion of the site, there remain outstanding matters that are of concern to local people. This includes the potential impact on the Dunchurch Pools Marina, which was referenced in 131 representations submitted to the Preferred Options consultation, confirming the importance of the Marina to local people.

6.1.3 The key themes that are raised through this part of the representations and referencing the relevant evidence provided alongside this consultation, are as follows:

- Highways & Access;
- Other Infrastructure Requirements;
- Viability;
- Landscape;
- Biodiversity;
- Heritage;
- Flood Risk.

6.1.4 Alongside these factors, it remains a concern the impact that a development of the scale envisaged by the Promoters of Lodge Farm would have on the wider locality, including Dunchurch Pools Marina. The marina is an inland waterways facility of local and national importance. It is an established business, underpinning the local canal tourism sector, supporting numerous local businesses and is a significant local employer. The business has developed due to its tranquil landscape setting within the Rainsbrook Valley and would suffer significant harm should the 2,680 houses and employment/retail/education/health/sport ‘new settlement’, proposed by the promoters of Site 73, proceed. This is a matter that should be factored into any consideration of Lodge Farm as a reasonable alternative. It remains the view of J Marine that Lodge Farm should

be dismissed as a potential development option for the Borough, as the adverse impacts would substantially outweigh any potential benefits.

6.2 Highways & Access

- 6.2.1 A key concern in respect of the proposals for Lodge Farm relates to the site's location, and the issues regarding accessibility. This was identified by the previous Local Plan Inspector as part of the rationale for the site's deletion, as the Inspector's report concluded that *'it is not a location where the need to travel would be minimised, or where the use of sustainable transport modes can be maximised'*. No evidence had been provided that the location could be made sustainable in transport terms.
- 6.2.2 In the response to the 2025 Preferred Options consultation, the promoters of Lodge farm identify that there are opportunities to increase public transport accessibility to the site and nearby settlements, whilst also referencing the benefits from internalisation and containment potential from a new settlement, which together would reduce pressure on the existing road network. However, key to the vision for the development is change to the character of the A45 to provide a safe pedestrian/cycle environment by reducing the speed of the highway to 30pmh. The implications of this on the operation of the wider highway network does not appear to have been considered, despite the known issues around the Dunchurch Crossroads.
- 6.2.3 The assessment of the site as a reasonable alternative through the preparation of this Submission version has continued to identify concerns with the site's location and accessibility. In the Sustainability Appraisal (SA) (December 2025) Scenario 8 (Preferred Options plus Lodge Farm) this scenario scores least favourably in terms of accessibility to key infrastructure, which is a key issue for the Plan. Whilst it recognises that the proposals would provide on-site community infrastructure, the delivery of this is uncertain due to the viability issues identified that are considered further below. The SA goes on to identify that the issue of the A426/B4229 in the centre of Dunchurch remains a concern where it is difficult to envisage a solution, as an eastern bypass to Dunchurch is not deliverable due to heritage constraints. The scenario accordingly also scores least favourably in terms of transport. The Stage 2 Site Assessment also provides further concerns in respect of the impacts for traffic from Lodge Farm on Dunchurch, noting that increasing traffic through Dunchurch should be avoided where possible, due to current congestion and air quality issues at this location.
- 6.2.4 The SA also identifies the issue of severance within the site, due to the position of the A45. Whilst a bypass is referenced in the Council's evidence generally and specifically in the SA, it does not appear that the proposals for Lodge farm as presented in the Promoter's Vision Document incorporate this, and therefore this strategic route will impact the ability to deliver a cohesive development, and/or impact the operation of this route. The Council's evidence base references the provision of a bypass to the A45, as it is included in the supporting infrastructure requirements referenced in the Viability Appraisal. It is therefore assumed that the Promoter's proposals do not incorporate this provision, or the financial implications of this, which could undermine the deliverability of the proposals.
- 6.2.5 The Council's Strategic Transport Assessment has considered the impact of Omission Sites, including Lodge Farm. This has confirmed that when the proposals for Lodge Farm were included into the modelling, the site is forecast to have significant impacts on the Rugby Wide Area (RWA) model network, if no mitigation is provided. This was particularly noted in respect of the Dunchurch

Crossroads, as well as the M45/A45 interchange. When mitigation was incorporated for Lodge Farm, this reduced the impact forecast on the network, however, this was when a significant amount of additional highway infrastructure was incorporated, as a minimum. The report urges caution, as these schemes would impact on viability, and the report recognised that it was not desirable to increase traffic volumes at Dunchurch Crossroads, given there is already congestion and capacity issues at this junction.

- 6.2.6 Despite the Promoter's assurance through the Regulation 18 Consultation response and supporting evidence, it is, therefore, evident that there remain concerns regarding the sustainability of the location and the impact of development on the highway network, even when mitigation is factored in. Whilst long-term the proposals may deliver the required infrastructure on site and/or secure improvements to public transport, there remains uncertainty regarding this and in the short-medium term the development is likely to be car-dependent and require residents to travel. The previous Local Plan Inspector specifically identified in respect of public transport services, that if a bus service to Rugby were to be provided, this would be unlikely to be used due to the circuitous route that it would need to take. This will impact on an already congested highway network, and represents an ongoing concern, particularly given the scale of development envisaged.

6.3 Infrastructure

- 6.3.1 To counter the concerns about the remote location of the site when compared to the urban area, and the challenges regarding accessibility, the proposals for Lodge Farm envisage the provision of supporting uses and infrastructure. However, in the SA (2025) the Council reference the potential likelihood of compromises including around infrastructure delivery, given the uncertainty regarding the scheme viability.
- 6.3.2 In terms of Infrastructure, the Stage 2 Site Assessment paper (December 2025) recognises that, whilst the development itself would not be large enough to fill a secondary school in its own right, a new school would be required to mitigate the additional need and for sustainability reasons given the relative isolation of the site. It goes on to reference the concerns about the timescale for a new school opening, as the critical mass needed to support a school opening is only likely to be reached later in the development programme, whilst it is also noted that a school would likely attract pupils from South Rugby, exacerbating highways concerns.
- 6.3.3 It should be recognised that the Infrastructure Delivery Schedule identifies that beyond those already planned for, there is not a need for any further new schools, but that up to three additional forms of entry at secondary level may be required. It is therefore evident that whilst a development at Lodge Farm could result in the provision of a new secondary school, this would not be needed otherwise, as opportunities for expansion at three existing schools has been identified to address increasing needs for secondary school places resulting from plan-led growth through the Submission version of the Plan.
- 6.3.4 As set out in the representations to the Preferred Options consultation, there remains a concern that the assessment has failed to acknowledge the potential for the new community living at Lodge Farm to lack good access to key services and facilities due to delayed (or failed) delivery of on-site infrastructure, or because the site is remote from and inaccessible to existing services. It is considered that the assessment in the SA has failed to acknowledge this fully, and the assessment of the scenario is therefore flawed, despite the Council recognising the likely delay to deliver

infrastructure such as through the Stage 2 Site Assessment report. This conflicts with the requirements of the presumption in favour of sustainable development in the Framework, which establishes at Paragraph 11 a) that all plans should promote a sustainable pattern of development that: ‘... align growth and infrastructure’; which plainly development at Lodge Farm would not achieve.

6.4 Viability

- 6.4.1 As alluded to above, the highways impacts of development at Lodge Farm would necessitate significant improvements to existing infrastructure, such that there are concerns about the impacts of this for the scheme viability. This is interrogated further in the Local Plan Viability Study prepared by BNP Paribas (December 2025). Table 6.31.1 identifies the assumed supporting community and transport infrastructure for Lodge Farm, including sports; health; education; and transport; suggesting that for infrastructure alone, this would total almost £195m or £72,743 per dwelling. The appraisal goes on to confirm that Lodge Farm could only be developed assuming 100% private housing (ie no affordable housing) and even then, the residual land value would remain negative (albeit resulting in a much reduced deficit in comparison with the deficit when they have modelled 30% affordable housing).
- 6.4.2 The Sustainability Appraisal also touches on viability for Lodge Farm, referencing the conclusions of the Viability Appraisal, and going on to reflect that in order to make the scheme viable, there would either need to be a significant increase in the number of dwellings; or significant cuts to infrastructure that is needed to make the new village sustainable and mitigate its impacts.
- 6.4.3 The Preferred Options representations submitted by the Promoter identify no concerns with viability that would prevent the site from coming forward. It is, however, recognised that the assumptions that would have informed that conclusion do not take into account all infrastructure requirements considered necessary by the Council, and therefore the reassurance provided by the Promoter should not be relied upon. As recognised by the Council’s evidence, any impact on viability would likely undermine the quality of development and supporting infrastructure delivery that would impact future residents.

6.5 Landscape

- 6.5.1 A principal concern for J Marine Ltd continues to be the potential for development of this scale and nature to adversely affect the landscape, in this sensitive part of the Borough and wider area. Dunchurch Pools Marina benefits from a location in the tranquil rural setting of the Rainsbrook Valley, free from large scale development, which is significant to the Marina’s success in establishing itself as a tourist destination and the associated economic benefits of this.
- 6.5.2 The impact on the landscape was part of the rationale for deletion of the allocation by the previous Local Plan Inspector, with the Inspector’s report suggesting ‘the proposed allocation would lead to significant harm to the intrinsic character and beauty of the countryside in this part of the borough’ paragraph 148 and at paragraph 147 setting out why this was not capable of mitigation. This is reinforced by the Landscape Sensitivity Assessment December 2025 Addendum report, which confirms that even when green infrastructure is integrated, residential development at this location is expected to alter the skyline and extensive views; going on to acknowledge the large scale nature of the proposals will contrast with the rural and scenic character of the Feldon Vale Farmlands Landscape Character Type. Notably, Site 73 is the only site scored ‘M’ or Medium, in

the Post-Mitigation Assessment, whereas other large sites were scored as either M/L (Medium/Low) or L (Low).

6.5.3 The sensitivity of the land around the Site 73 Lodge Farm allocation, in particular to the north, is demonstrated through the proposed designation of the Rainsbrook Valley Landscape of Elevated Sensitivity. Whilst the proposed designation currently is restricted to north of the M45, as identified elsewhere in these representations and supporting evidence, it is considered that the proposed designation should be extended further along the Rainsbrook Valley, recognising that the area of high sensitivity extends beyond that which adjoins the Rugby urban area. As set out in Chapter 5 of this report in response to Policy EN3 and the accompanying assessment at Appendix 2, it is considered that the designation of the Rainsbrook Valley Landscape of Elevated Sensitivity should extend southwards, and include land promoted as Site 73.

6.5.4 It should also be recognised in the context of the Council's Rainsbrook Valley landscape sensitivity assessment (2025) that this area was considered highly susceptible to 'major residential development' proposals of more than 50 dwellings. It was recognised that in localised areas (adjacent to the Ashlawn Road on the edge of the Rugby built up area) this may reduce to lower or moderate where both topography and vegetation provide screening; whilst the landscape may also be less susceptible to smaller scales of development such as less than 10 dwellings. The assessment presented at Appendix 2 confirms that the additional area that should be included within the extended Rainsbrook Valley designation is of similar high susceptibility to development. This reinforces concerns that the proposed development, that is being promoted as Lodge Farm, would adversely impact the landscape, in an area that is highly susceptible to development of 50 dwellings or more.

6.6 Biodiversity

6.6.1 The Council's assessment of the site through the Stage 2 Site Assessment identified that an initial assessment has indicated that the site is not within the Impact Risk Zones of a SSSI nor a Local Wildlife Site, and was not comprised of more than 20% medium to high distinctiveness habitat.

6.6.2 Whilst not in relation to the Lodge Farm site itself, the Rainsbrook Valley Landscape Sensitivity Assessment (2025) did consider the value in respect of natural heritage, including biodiversity. This confirmed that whilst habitats and biodiversity were fairly typical for agricultural landscapes, areas of elevated quality were recognised including local nature reserves, wildlife sites and country parks.

6.6.3 The assessment of the wider Rainsbrook Valley provided at **Appendix 2** confirms that the additional area similarly makes a moderate contribution to natural heritage, recognising ecological designations, priority habitats, and the role of deciduous woodland. This was confirmed in the Regulation 18 Preferred Options representations, which identified that Lodge Farm is located in close proximity to a number of designated ecological sites, including:

- Rainsbrook Tributary – Eco Site 22/57
- Disused Canal – Eco Site 04/56
- Fields at Onley Prison – Eco Site 14/56
- Oxford Canal – Eco Site 04/56
- Disused Central Railway – Eco Site 02/57 + 02/56

- Draycote Meadows SSSI

6.6.4 A development of the scale envisaged at Lodge Farm would adversely impact established wildlife corridors, and interrupt the strategic ecological corridor linking the Dunsmore and Feldon Landscape to the west, and the Northamptonshire Uplands and Leicestershire Vales to the east.

6.7 Heritage

6.7.1 As noted in the Preferred Options response submitted on behalf of J Marine, heritage is another constraint that should influence the consideration of Lodge Farm. Those previous representations identified that the ridge and furrow present at Lodge Farm has previously been identified by Historic England as of national importance when assessing development proposals at Willoughby, with advice that the protection of such areas should be managed by the planning process. Other heritage features such as the Onley medieval village, Iron Age site at Barby Hill, as well as the historic town of Dunchurch were similarly identified as likely to be impacted, which is not considered in the SA, the conclusions of which should be revisited in this regard.

6.7.2 Previous representations to the Preferred Options consultation from other parties also highlighted the archaeological significance of the area, referencing the investigations undertaken prior to the development of the Marina, as well as the extension of the reservoir on Barby Hill. Those investigations confirmed the area has been populated since at least Iron Age times, with the landscape reflecting that history. The response went on to reflect that geophysical surveys have identified the Romano-British settlement and traces of the deserted ancient village of Onley. It is suggested therefore that the proposed development would have an undesirable impact on the historic landscape and damage nationally important ridge and furrow. The presence of ridge and furrow has been confirmed through the LiDAR data presented in the Landscape Assessment by Incola presented at **Appendix 2**.

6.7.3 Despite these points being identified in the previous consultation, there remains no real consideration of heritage in the evidence available when assessing, and dismissing Site 73 – Lodge Farm. In relation to heritage concerns, the Stage 2 Site Assessment accompanying this consultation continues to identify that there are no designated heritage assets within 50m of the Lodge Farm site but does go on to recognise that ‘ridge and furrow may be present on site’, which is now confirmed as present in the LiDAR data presented as referenced above. The Council should recognise this as a further reasoning to continue to dismiss the development potential of Site 73.

6.8 Flood Risk

6.8.1 The Council's evidence acknowledges that parts of Site 73 – Lodge Farm are at higher risk of flooding, with a small area at risk of fluvial flooding to the north west, whilst areas of higher risk of surface water flooding are identified across the site. In the Stage 2 Site Assessment, despite recognising this, surface water flood risk is identified as a ‘low’ risk constraint, however foul water drainage was assessed as a ‘high’ risk constraint. It is noted that this was a consistent conclusion on all larger sites assessed, however for a development of this scale ensuring infrastructure such as sewage is deliverable is critical, and any uncertainty regarding this should be recognised as an important constraint.

6.8.2 Notwithstanding the conclusions of the Site Assessment paper, the Sustainability Appraisal identifies concerns regarding flood risk, noting that whilst masterplanning could avoid any

sensitive development in affected areas, this may be a challenge given that development would already be constrained by viability concerns. It is recognised that surface water flood risk can be addressed through development, however the extent of the impacted areas across the site would represent a challenge for masterplanning.

7 SUMMARY & CONCLUSIONS

7.1 Summary

7.1.1 These representations have been prepared on behalf of J Marine Ltd, to respond to the current consultation on the emerging Rugby Local Plan, Regulation 19 Publication version consultation. These representations relate to J Marine's operations at Dunchurch Pools (Marina), located south-east of Dunchurch on the Oxford Canal, on the eastern edge of Rugby Borough administrative area and straddling the boundary with West Northamptonshire District.

7.1.2 These representations build on the response provided to the Regulation 18 consultation in 2025, which should be reviewed alongside this report. Those representations provided a detailed overview of the Marina, including its planning history, current offering (moorings, supplies, brokerage, boatyard, café and public access to the countryside), future aspirations and the role it plays as a local employer and nationally significant tourist destination. Those representations also considered the evidence base published alongside the Plan, and in particular the assessment of reasonable alternatives including Site 73 – Lodge Farm.

7.1.3 In respect of the emerging Plan, these representations confirm that J Marine continues to support the approach that the Council has taken in regards to the Publication draft. The strategy and approach to housing in particular are strongly supported and considered to align positively with national policy and guidance.

7.1.4 On behalf of J Marine however, these representations have highlighted a number of areas where it is considered the Plan could be enhanced. These include:

- Economy –
 - Policy E3 – should be modified so that it is consistent with and reflects national policy;

The proposed modifications to the policy text are set out as follows:

The following forms of development are acceptable in principle both in and outside of rural settlement boundaries, subject to their compliance with other policies of this plan (including Green Belt policy):

xiii. ~~small-scale~~ tourism, visitor accommodation and leisure-based uses including sport and recreation;

xiv. small-scale expansion of existing holiday caravan/chalet sites;

xv. garden centres and nurseries;

xvi. equine and equestrian development;

xvii. agricultural and forestry buildings;

xviii. new canal-based facilities, but, where such facilities are outside of settlement boundaries, not including permanent residential moorings.

Proposals within paragraph A of this policy must be of an appropriate scale and type for their location.

New visitor accommodation outside settlement boundaries must be demonstrated to be viable through a credible business case.

Conversion of visitor accommodation outside of settlement boundaries to permanent residential use will not be supported.

Diversification of farms will be permitted where:

xix. best and most versatile agricultural land is avoided;

xx. new uses are subservient in scale to the main agricultural use; and

xxi. existing buildings are used if possible.

Proposals for new canal-based facilities should be directed to locations within or adjacent to defined settlements to ensure that these are sustainably located.

- Environment –

- Policy EN2 – the evidence base has taken a narrow view of landscape sensitivity, failing to consider the wider context; and
- Policy EN3 – the proposed designation and policy should be modified to ensure that it is effective and achieves its purpose.

The proposed modifications to the designation area are illustrated on the Plan at **Appendix 3**, whilst the proposed changes to the policy text are as follows:

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 designated landscape are avoided.

B. [no change proposed]

C. Safeguard important views within, ~~and~~ across, and beyond the Rainsbrook Valley and minimise adverse visual impacts on the edge escarpment

D. [no change proposed]

E. [no change proposed]

7.1.5 In support of the proposed modifications to Policy EN3, these representations are supported by an assessment of Landscape Sensitivity that has been undertaken to complement the Council's 2025 evidence. This demonstrates that the area of the Rainsbrook Valley beyond the proposed designation is similarly of high sensitivity to development, and supports J Marine's conclusions that the designation should be extended to encompass the Rainsbrook Valley as a whole.

7.1.6 The representations go on to consider specifically the matter of Site 73 – Lodge Farm. Whilst it is acknowledged that the site is not proposed to be allocated through the Publication version of the Plan, the promoted site continues to be considered in the evidence base, as a reasonable

alternative. This is despite the strength of public opposition to the site, which included reference to the harmful impact that such development would have on Dunchurch Pools Marina and the Borough's tourism economy. These representations follow on from the concerns raised through the Regulation 18 response, to identify concerns in respect of matters such as highways, infrastructure, viability, landscape, biodiversity, and heritage that would result in adverse impacts should a development of the scale of Lodge Farm be brought forward in this location. This is notwithstanding the impact that the development would have on Dunchurch Pools as an important tourist destination and established local business, which has developed due to its tranquil Rainsbrook Valley landscape setting. The cumulative effect of these adverse impacts outweigh any potential benefits, and it is therefore requested that the site be dismissed as a reasonable alternative.

**APPENDIX 2 – RAINSBROOK VALLEY LANDSCAPE
SENSITIVITY ASSESSMENT – INCOLA**



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1 INTRODUCTION

- 1.1 Incola Landscape Planning has been appointed by J Marine Ltd to undertake a review of the Rainsbrook Valley Landscape Sensitivity Assessment, December 2025. This has included a review of the baseline analysis, definition of the Rainsbrook Valley assessment area and findings of the sensitivity assessment, taking into account landscape value factors and the susceptibility of the wider Rainsbrook Valley.
- 1.2 The 2025 Landscape Sensitivity Assessment was prepared by Node, who were commissioned by Rugby Borough Council to provide an up-to-date appraisal of the Rainsbrook Valley that will be used to support policy and decision making by the local planning authority (LPA). The Study forms part of the evidence base to the emerging Rugby Borough Local Plan 2025-2042.

RUGBY LOCAL PLAN 2025 – 2042

POLICY EN3 RAINSBROOK VALLEY LANDSCAPE OF ELEVATED SENSITIVITY

- 1.3 At the time of writing (March 2026), the Proposed Submission Version of the Local Plan is undergoing Regulation 19 Consultation. The emerging Local Plan designates land within the northern part of the Rainsbrook Valley within Rugby Borough as a 'landscape of elevated sensitivity' under draft Policy EN3.
- 1.4 The extent of the proposed locally designated landscape is illustrated on the extract of the proposals map at **Figure 1.1** below, marked by a light green wash with a dark green hatching.

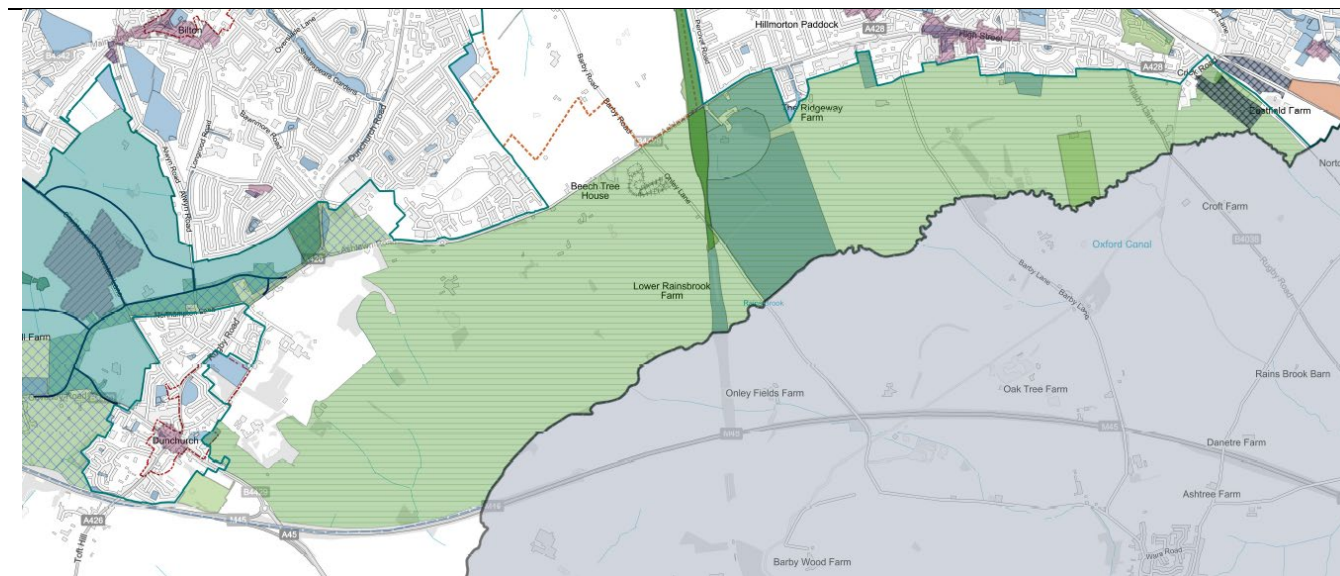


Figure 1-1: Rainsbrook Valley landscape of elevated sensitivity – Draft Policy EN43

1.5 Policy EN3 requires that:

- A. *Within the Rainsbrook Valley landscape of elevated sensitivity as defined on the policies map, development shall comply with paragraphs B to E of this policy.*
- B. *Protect, reinforce and where possible enhance the landscape character taking into consideration the following landscape factors:*
 - i. *natural heritage*
 - ii. *cultural heritage*
 - iii. *landscape condition*
 - iv. *associations*
 - v. *distinctiveness*
 - vi. *recreational value*
 - vii. *perceptual scenic and tranquility qualities*
 - viii. *functional landscape qualities*
- C. *Safeguard important views within and across the Rainsbrook Valley and minimise adverse visual impacts on the edge escarpment.*
- D. *Protect and where possible enhance the landscapes and settings of: 'Bilton Grange' and 'Dunchurch Lodge' registered park and gardens; Rugby Diamond Jubilee Wood Country Park; and Rainsbrook Cemetery and Crematorium.*
- E. *Protect and where possible enhance the natural heritage, connectivity and recreational value of Great Central Walk, the Oxford Canal, and the Public Rights of Way Network.*

- 1.6 The accompanying text to policy EN3 states that the findings of the Rainsbrook Valley Landscape Sensitivity Assessment (2025) justify affording the area a higher degree of consideration in decision making.
- 1.7 The landscape factors set out at criterion B of draft Policy EN3 reflect the value factors used within the Rainsbrook Valley Landscape Sensitivity Assessment to define the sensitivity of the landscape. The findings of the assessment for each of these factors as they relate to the landscape sensitivity (value and susceptibility) of the wider Rainsbrook Valley are considered further at Section 3 of this report.

EXTENT OF THE RAINSBROOK VALLEY LANDSCAPE OF ELEVATED SENSITIVITY

- 1.8 Notably, the proposed Rainsbrook Valley landscape of elevated sensitivity does not extend south of the M45 to include the whole Rainsbrook Valley within Rugby Borough. This is despite the valley covering broad swathes of countryside beyond the motorway corridor, including land at Toft Hill, Dunchurch and land to the south and west of Barby Hill, extending southwards to include the wider valley floor that leads to the vale beyond. The distinctive landform of the valley is illustrated by **Plan 1: Topography and Landform** at the rear of this report.
- 1.9 The Rainsbrook Landscape Sensitivity Study 2017 identifies Toft Hill, south of the M45, as an area of high landscape sensitivity.
- 1.10 The Rainsbrook Valley Landscape Sensitivity Assessment 2025 identifies a further area of the Rainsbrook Valley floor, south of the M45, as an area of high landscape sensitivity.
- 1.11 As summarised at Section 4 of this report, this Rainsbrook Valley Landscape Sensitivity Assessment Review identifies the wider valley, including land south of the M45, Toft Hill, Barby Hill and the valley floor as being of a high landscape sensitivity.
- 1.12 Given the above, it is unclear as to why the draft Local Plan has not recognised the full extent of the Rainsbrook Valley within Rugby Borough as being of a higher sensitivity and incorporated the land into the locally designated "landscape of elevated sensitivity".
- 1.13 It is noted that the LPA boundary does not cover the whole of the Rainsbrook Valley, with a portion south of the Rains Brook falling within West Northamptonshire.

RAINSBROOK LANDSCAPE SENSITIVITY STUDY, 2017

- 1.14 The value and sensitivity of the valley was recognised by previous assessments, including the 2017 Rainsbrook Valley Landscape Sensitivity Study prepared by Warwickshire County Council Landscape Architects on behalf of Rugby Borough Council.
- 1.15 The 2017 Study assessed the escarpment and northern slopes of the valley on the edges of Rugby and Dunchurch as being of a high sensitivity to development due to the openness, visual prominence from public viewpoints, ecological connectivity and role of the valley in defining the settlement edge and approach to Rugby.
- 1.16 This includes land at Tofts Hill, south of Dunchurch and the M45 (land parcel zone 14j) which was assessed as being of a high sensitivity due to the openness of the land, topography and dramatic change in landform giving rise to long distance views to the south and southeast
- 1.17 The 2017 study recognises that the landform of the zone contrasts with the flatter Rainsbrook valley to the south and southeast, acknowledging that the valley continues to extend further beyond the M45 in these directions.

- 1.18 The extract of the Housing Sensitivity Map taken from the 2017 Study included at **Figure 1.2** shows the extent of land parcels assessed, including to the south of the M45.

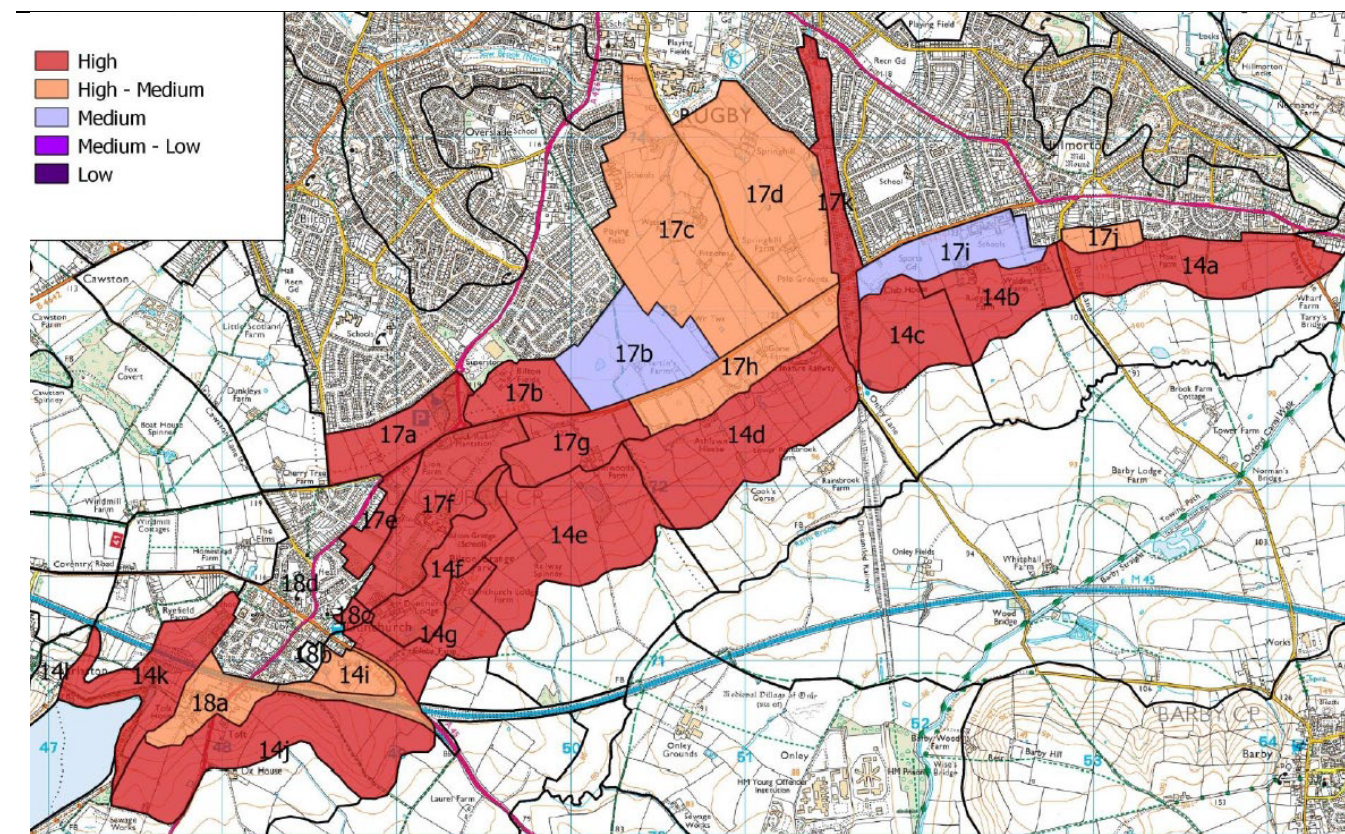


Figure 1-2: Rainsbrook Valley Landscape Sensitivity Study, 2017: Housing Sensitivity Map

RAINSBROOK VALLEY LANDSCAPE SENSITIVITY ASSESSMENT, 2025

- 1.19 The 2025 Rainsbrook Valley Landscape Sensitivity Assessment also assesses land to the south of the M45 within Rugby Borough, between the motorway and A45 (Daventry Road), that has not been included within the proposed Rainsbrook Valley landscape of elevated sensitivity. The 2025 assessment also includes land on the southern valley sides, Barby Hill and at Onley, within West Northamptonshire. This is illustrated by the extract at **Figure 1.3**

Landscape Sensitivity Assessment – Additional Area

- 1.22 Finally, an assessment of the sensitivity of the Additional Area (the balance of the Rainsbrook Valley not included in the 2025 assessment) has been undertaken using the approach and methodology employed by the 2025 assessment. This has included a comparative assessment of landscape value using the various factors that are set out at draft Local Plan Policy EN3, criterion B, allowing for a greater understanding of the sensitivity across the valley as a whole.

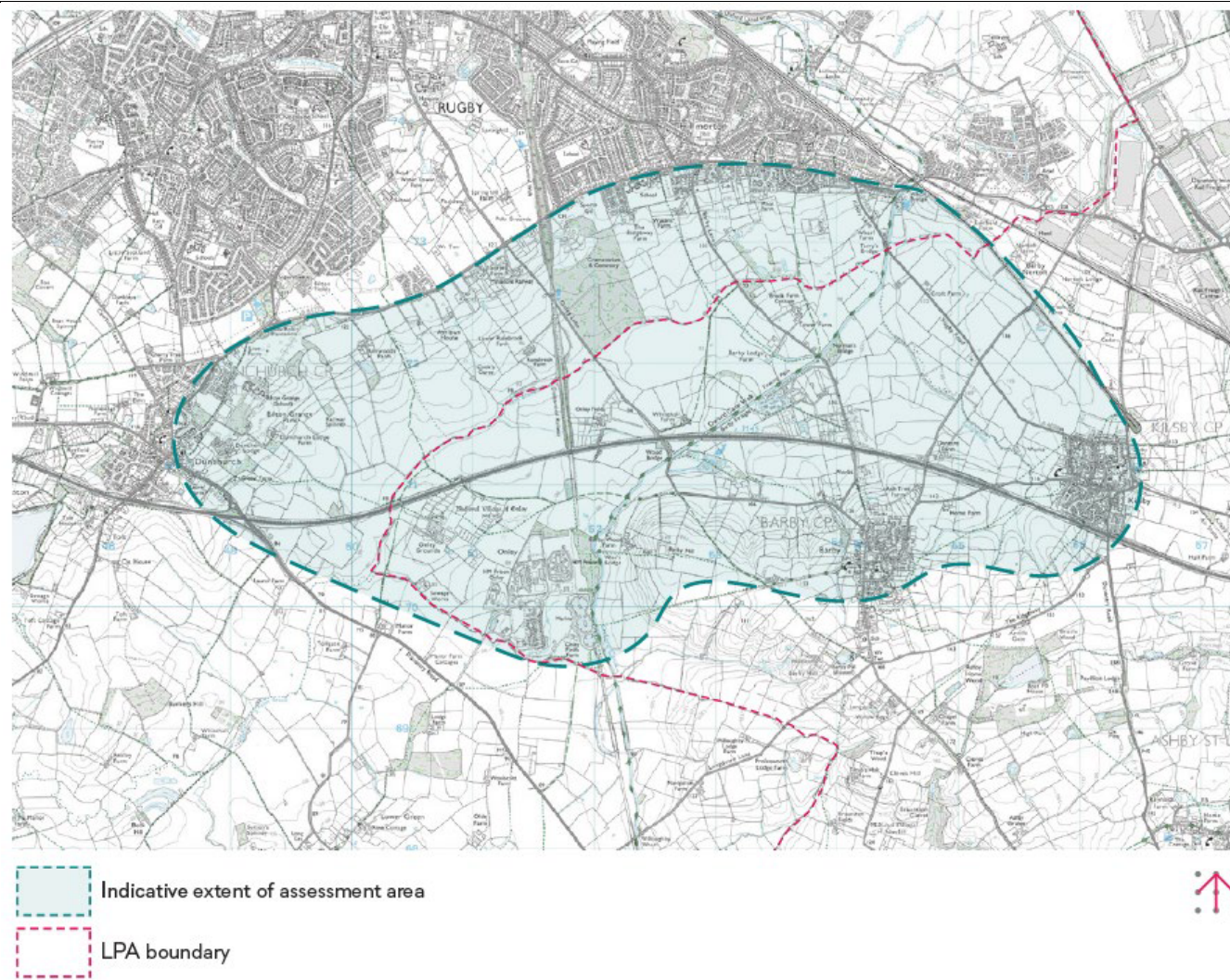


Figure 1-3: Rainsbrook Valley Landscape Sensitivity Assessment, 2025 Assessment Area

SCOPE OF THIS REPORT

Definition of the Rainsbrook Valley

- 1.20 Given the differences in the study areas of both the 2017 and 2025 assessments and the whole Rainsbrook Valley, the extents of the Rainsbrook Valley have been reviewed. This has identified the Rainsbrook Valley boundary that includes additional land, the 'Additional Area', within the valley to the south of that considered by the 2025 assessment

Landscape Character Context

- 1.21 An overview of the published landscape character assessments within Rugby Borough and West Northamptonshire has been undertaken. This identifies key characteristics, feature and sensitivities. An overview of the character and features within the wider assessment area has also been included.

2 DEFINING THE RAINSBROOK VALLEY

- 2.1 The Rainsbrook Valley lies to the south of Rugby, forming a distinctive landscape defined by the landform of the Dunsmore Plateau to the north and ironstone hills to the south and east, including Barby Hill. The valley extends northeast – southwest between the plateau and ironstone fringe, opening-out into a broad valley landform south of Dunchurch at Tofts Hill and west of Barby Hill.
- 2.2 The southern edge of Rugby town lies on the edge of the plateau, set above the northern slopes of the valley, which opens up to the south and west. The valley floor is crossed by numerous tributaries that flow into the Rains Brook.
- 2.3 To the southern edge of the valley, a number of promontories including those at Bunker’s Hill, Woolscott and Willoughby mark the transition with the wider vale at the confluence with the River Leam beyond.
- 2.4 The distinctive landform and features that define the valley are illustrated on **Plan 1: Topography and Landform** and extract at **Figure 2.1**.

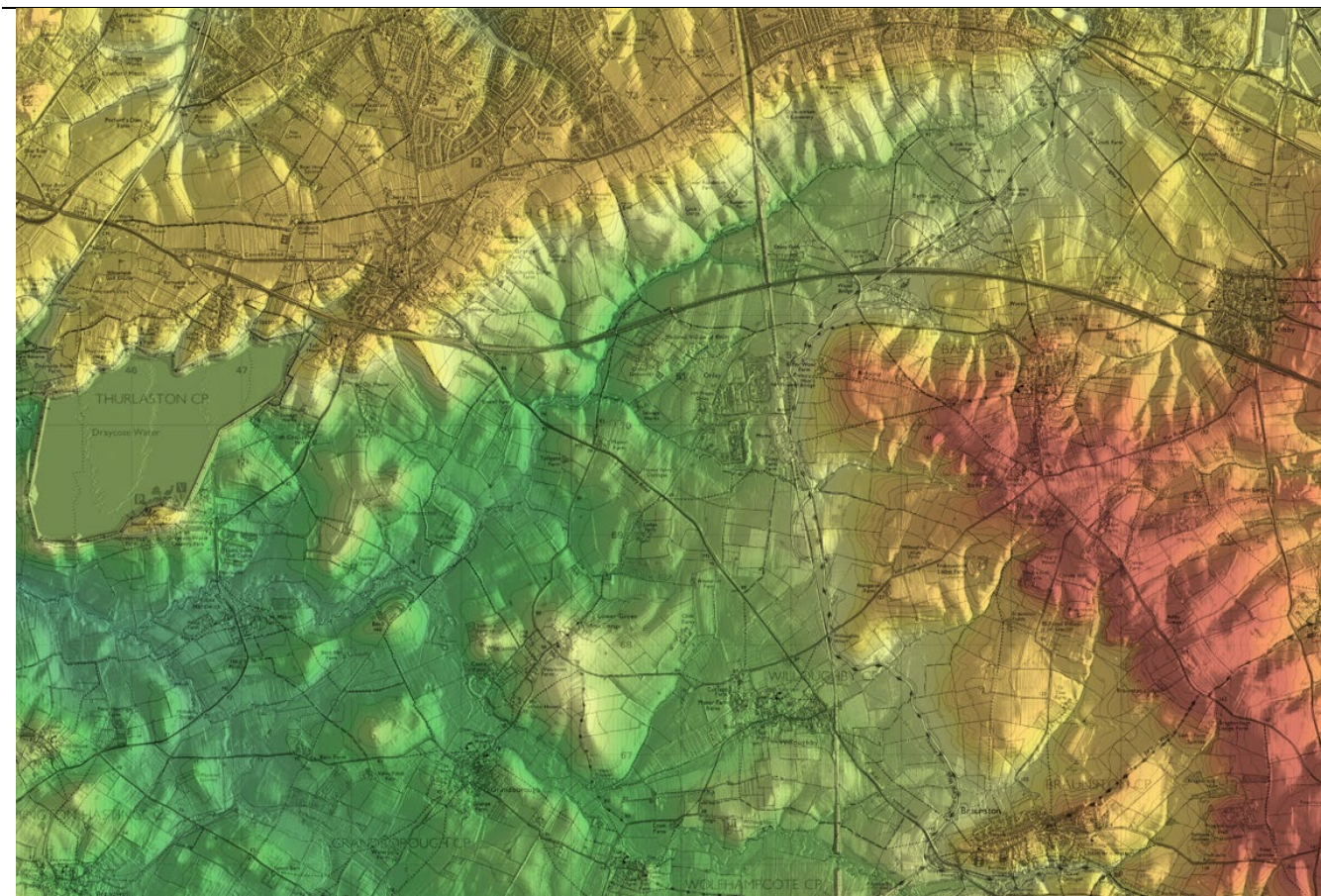


Figure 2-1: Landform and Features of the Rainsbrook Valley - extract of Plan 1

- 2.5 The plan has been generated using LiDAR data, and clearly shows the topographical variations, as well as features on the ground, including watercourses, the Oxford Canal, line of the Great Central Railway and field patterns. These include ridge and furrow and areas of the medieval field system and earthworks associated with lost settlements and archaeological sites.

RAINSBROOK VALLEY LANDSCAPE SENSITIVITY ASSESSMENT, 2025 – ASSESSMENT AREA

- 2.6 At Section 2 'Method', the sensitivity assessment defines the Assessment Area, stating that:

"... the assessment considers the Rainsbrook valley as a whole, including the full length of a distinctive east/west aligned geomorphological area with the Rains Brook at the base, and slopes rising to Rugby in the north, and Barby and Kilsby to the south and southeast."
- 2.7 The indicative extent of the assessment area is included on page 7 of the assessment documentation and overlaid on **Plan 2: Rainsbrook Valley Landscape Sensitivity Assessment, 2025 – Assessment Area** and extract at **Figure 2.2**.

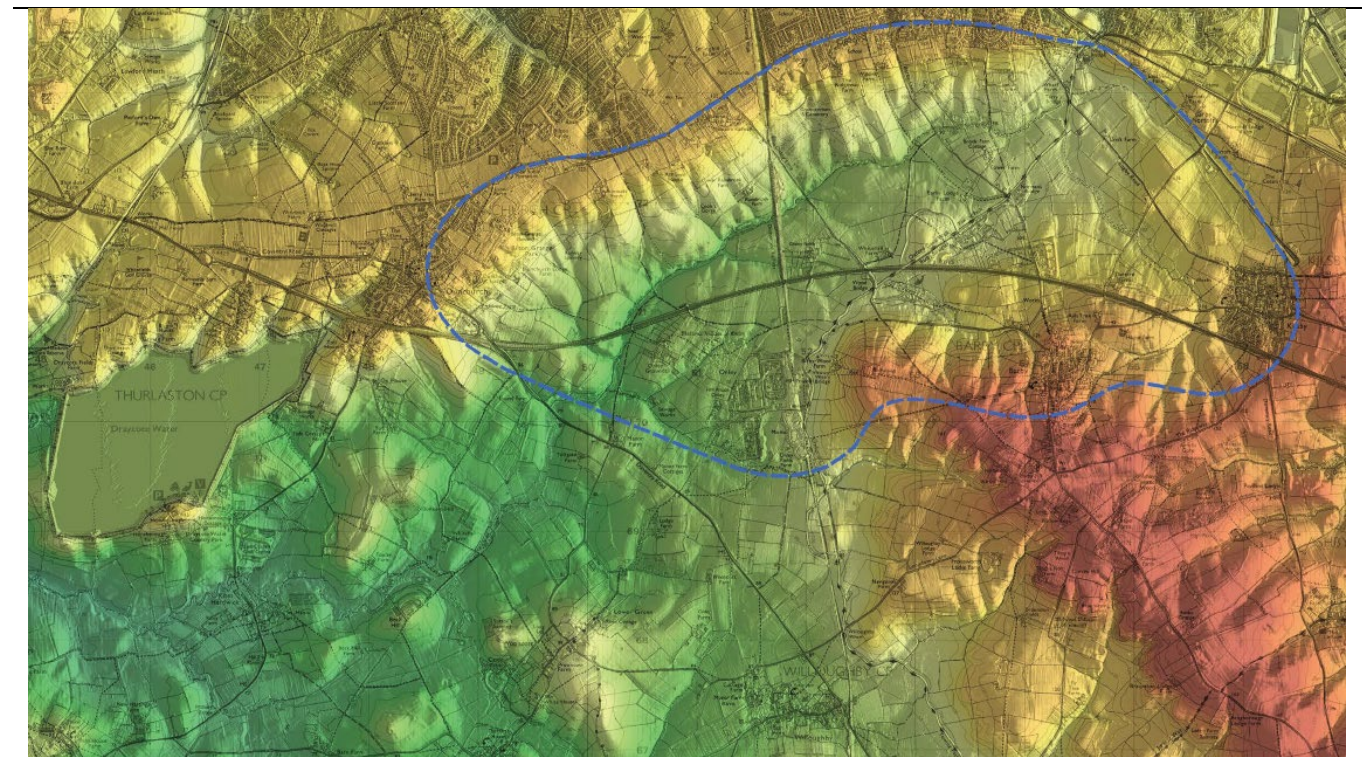


Figure 2-2: Rainsbrook Valley Landscape Sensitivity Assessment, 2025 - Assessment Area

RAINSBROOK VALLEY – WIDER AREA

- 2.8 As illustrated on **Plan 2** and the extract at **Figure 2.2**, the assessment area defined by the Rainsbrook Valley Landscape Sensitivity Assessment, 2025 does not include the wider valley floor that extends south towards the confluence with the River Leam, defined by the promontories that delineate the transition to the wider vale landscape beyond.
- 2.9 The area also excludes the distinctive ridgeline and slopes of Toft Hill, south of Dunchurch, which form a backdrop in views approaching Dunchurch, affording extensive views across the valley to the south and southeast, as recognised by the 2017 sensitivity study.
- 2.10 Furthermore, the assessment does not include a significant portion of Barby Hill, the ironstone fringe forming the south-eastern valley side, affording extensive views across the valley’s southern portion and out across the transition to the vale beyond. Incola have defined a Wider Assessment Area that accordingly incorporates the wider valley floor within the catchment of the Rains Brook and land south of Dunchurch at Tofts Hill, as well as the southern slopes of Barby Hill, both of which are distinctive features in the valley landscape.
- 2.11 The extent of the Rainsbrook Valley is illustrated on **Plan 3** and extract at **Figure 2.3**.
- 2.12 The ridgeline at Tofts Hill defines the western edge of the valley. To the south, the extents of the wider assessment area at the transition with the wider vale and confluence with the River Leam, the boundary follows the course of tributaries that flow from the slopes of Tofts Hill, Bunkers Hill and Woolscott.
- 2.13 To the southeast, the valley is defined by the slopes of Barby Hill, with the boundary drawn along Longdown Lane that crosses the slopes and rises to follow the ridgeline around Barby and Kilby.
- 2.14 The Rainsbrook Valley boundary is shown at **Plan 3** and extract at **Figure 2.3**. The extents of boundary reflecting the definition of the Rainsbrook Valley as described within the Rainsbrook Valley Landscape Sensitivity Assessment, 2025 at Section 4.2 ‘Character and context’ (page 36):

“The Rainsbrook Valley lies south of Rugby, and beyond the Ashlawn Road (B4429). The valley is aligned broadly ENE / WSW, with slopes rolling down from a long, linear northern ridge and plateau, and a promontory range of hills (including Barby Hill) to the south. The Rains Brook watercourse flows along the valley bottom from east to west, before the valley opens out, and into the low-lying plains of the River Leam.”

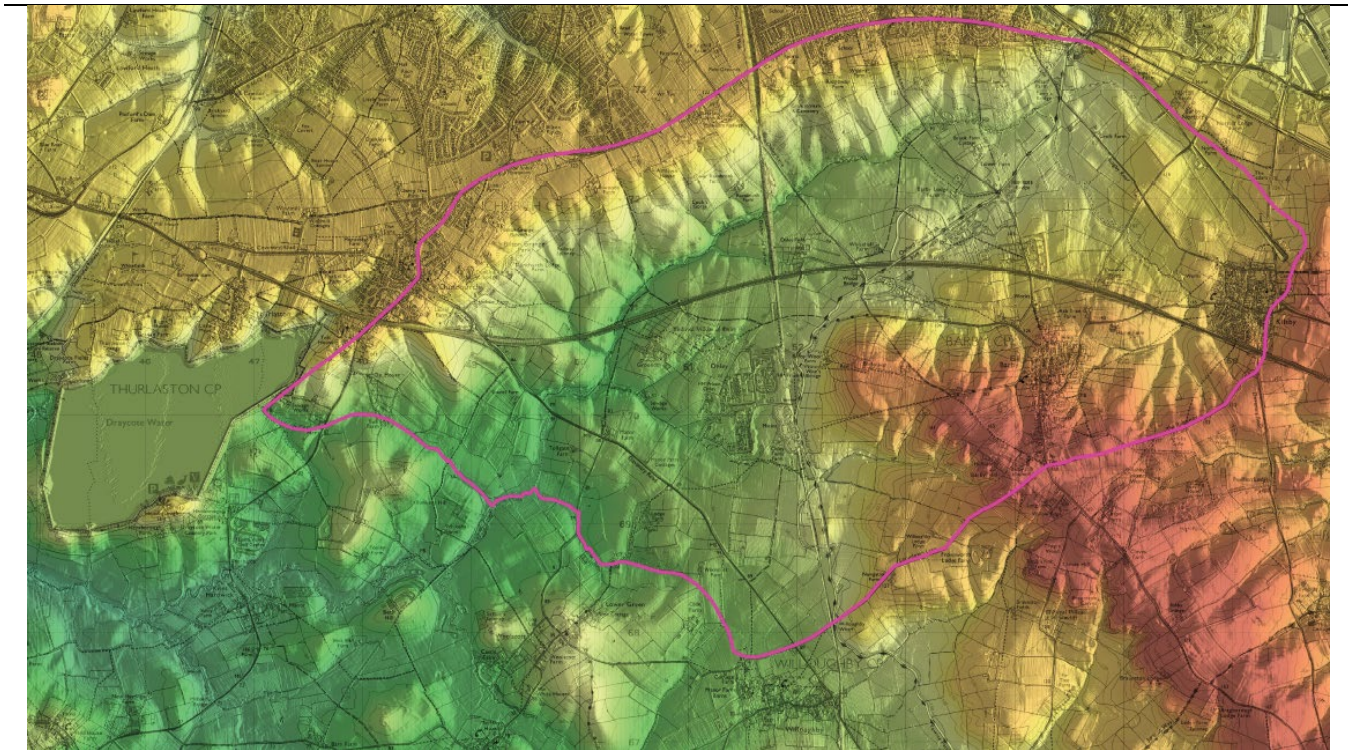
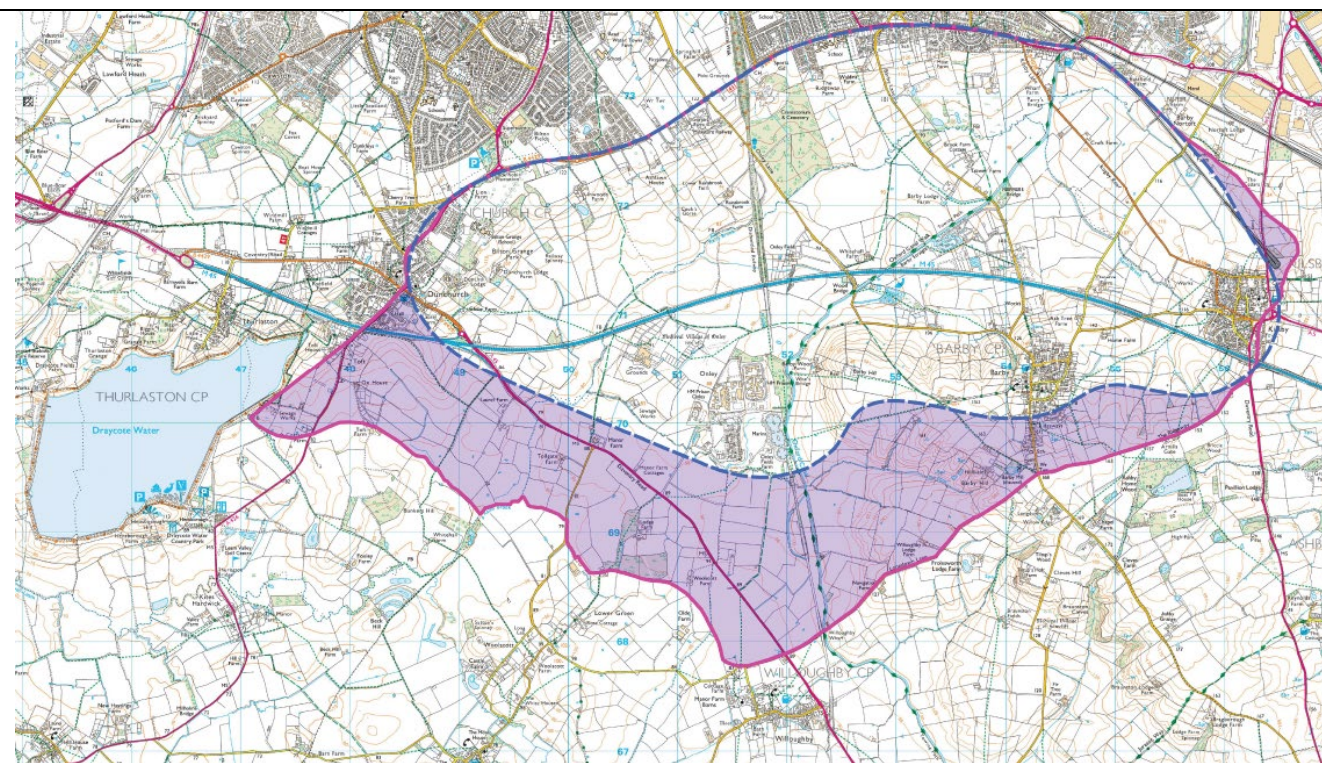


Figure 2-3: Rainsbrook Valley Boundary - Wider Assessment Area

ADDITIONAL AREA FOR ASSESSMENT

- 2.15 The extent of the Additional Area, the difference between the Rainsbrook Valley boundary and the 2025 assessment area, is illustrated on **Plan 4** and extract at **Figure 2.4**.
- 2.16 At Section 4 of this report, Incola have undertaken a comparative assessment of landscape value and susceptibility to include the Additional Area. This has used the method adopted by Node within the Rainsbrook Valley Landscape Sensitivity Assessment 2025, and provides a comparative assessment of the overall value of the wider valley.



Legend



Rainsbrook Valley Extents



Rainsbrook Valley Landscape Sensitivity Assessment 2025 - Assessment Area Extents



Additional Area

Figure 2-4: Rainsbrook Valley - Combined Assessment Areas

3 LANDSCAPE CHARACTER CONTEXT

- 3.1 Having defined the Additional Area capturing the balance of the Rainsbrook Valley, a review of published landscape character assessments is set out below. This identifies the key characteristics of the landscape, as well as key features, sensitivities and guidelines.
- 3.2 A summary of how these characteristics and features are represented within the Additional Area is also included.
- 3.3 This information has been used to inform the sensitivity assessment for the Additional Area contained at Section 4 of this report.

RUGBY BOROUGH LANDSCAPE CHARACTER ASSESSMENT, 2025

- 3.4 The 2025 landscape character assessment was prepared to support the preparation of the new Rugby Local Plan. As part of the evidence base to the emerging Local Plan, the landscape character assessment assists in identifying landscapes of particular value and sensitivity, including the Rainsbrook Valley.
- 3.5 As recognised by the National Planning Policy Framework (NPPF), at paragraph 187 (a) planning policies and decisions should contribute to and enhance the natural and local environment by:

"Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan) "

- 3.6 In addition to this, the NPPF paragraph 187 also requires policies and decisions to recognise the intrinsic character and beauty of the countryside, including wider benefits for natural capital and ecosystem services.
- 3.7 The Planning Practice Guidance (PPG) elaborates on the NPPF, clarifying that strategic policies in development plans should provide for the conservation and enhancements of landscapes, including through nationally and locally designated landscapes, as well as the wider countryside.
- 3.8 The PPG emphasises that, where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence.
- 3.9 Taken together, the Landscape Character Assessment and Rainsbrook Valley Sensitivity Assessment provide supporting evidence for relevant policies and designations, including that of the proposed Rainsbrook Valley Landscape of Elevated Sensitivity.
- 3.10 The landscape character assessment defines a series of distinct Landscape Character Areas (LCAs) and Landscape Character Types (LCTs) across the Borough, and sets out the key characteristics and

designations for each, as well as setting out 'Landscape Guidelines' that aid in the planning, management and protection of the distinctiveness of the landscape.

DUNSMORE LANDSCAPE CHARACTER AREA

- 3.11 As illustrated on **Figure 3.1**, the land on the northern slopes of the Rainsbrook Valley lies within the Dunsmore LCA, with the land beyond the plateau edge and Ashlawn Road predominantly within the Dunsmore Plateau fringe LCT

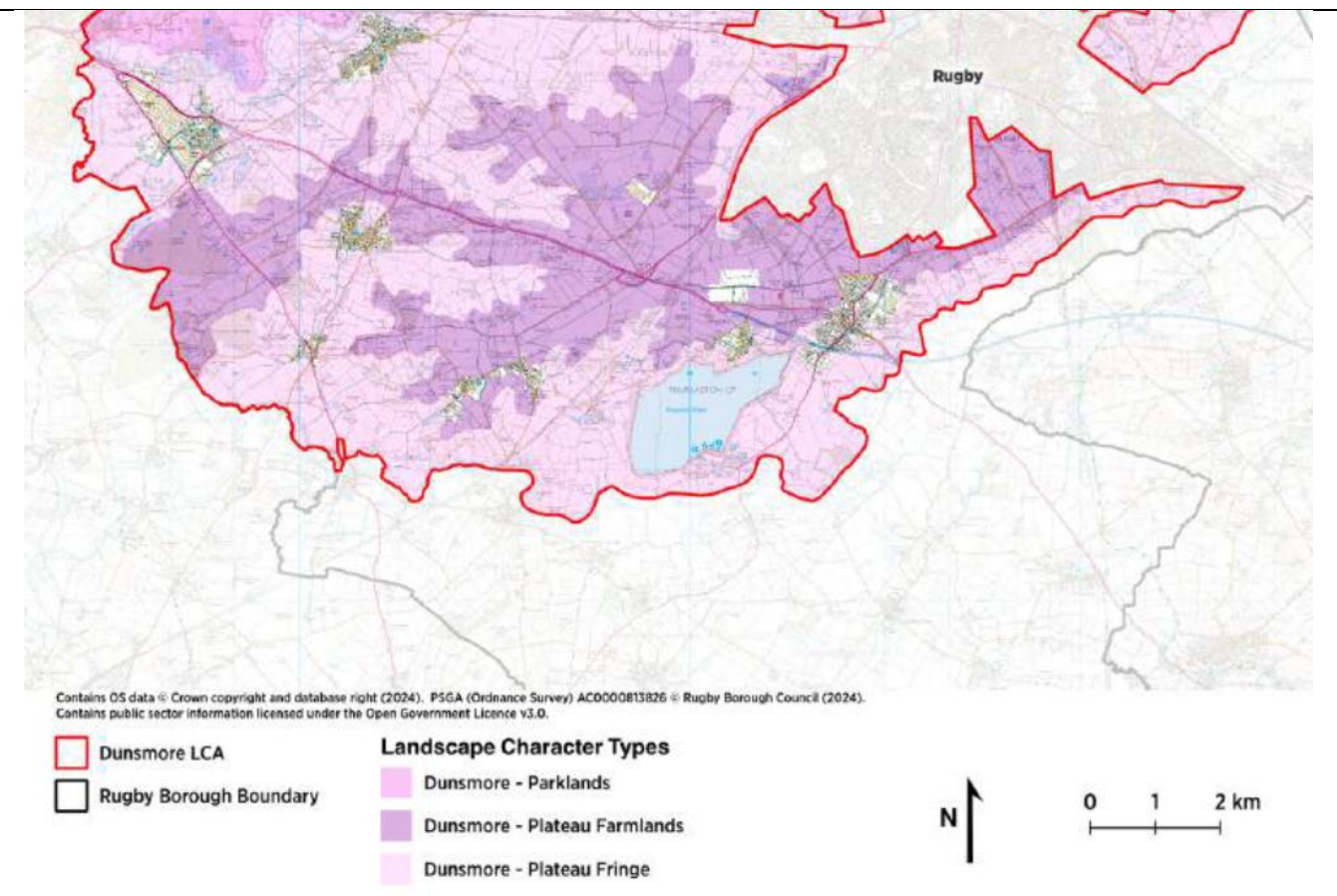


Figure 3-1: Dunsmore LCA and constituent LCTs – Rugby Borough Landscape Character Assessment

DUNSMORE – PLATEAU FRINGE LANDSCAPE CHARACTER TYPE

- 3.12 As set out in the landscape character assessment:

"The Plateau Fringe is characterised by its large arable fields and poorly defined field patterns, interspersed with pockets of permanent pasture, river meadowland and small hedged fields. Small, nucleated villages are a characteristic feature, comprising of loose clusters of dwellings and isolated, brick built farmsteads."

3.13 Pressures facing the landscape include:

- Inappropriate development bordering woodland, causing habitat fragmentation and species isolation.
- Loss of mature trees and hedgerows to urban development and agricultural intensification.
- Sensitive design is lacking in some new residential developments, particularly in Rugby's peri-urban areas.
- Ridge and furrow and the historical earthworks continue to be lost to ploughing, seeding and conversion to arable land.

3.14 Landscape Guidelines for the plateau fringe are:

- Protect hedgerows and hedgerow trees.
- Maintain and enhance enclosed wooded character.
- Enhance the structure and key features of the farmed landscape.
- Protect and manage Draycote Reservoir and the network of canals and rivers to enhance biodiversity, water quality and for their contribution to recreation, sense of place and geodiversity.
- Protect and manage the historic character and settlement pattern, including the deserted settlements, ancient settlements, veteran trees, farmsteads, country houses and landscaped parklands. This will enhance the educational and recreational experience for urban and rural communities.

FELDON LANDSCAPE CHARACTER AREA

3.15 The balance of the Rainsbrook Valley within Rugby Borough is contained within the Feldon LCA, as illustrated by the extract at **Figure 3.2** The wider valley is sub-divided into three LCTs, with the Vale Farmlands crossing the valley floor, and Ironstone Fringe marking the higher ground to the east of the vale, and including Barby Hill.

3.16 When describing the Feldon LCA, the landscape character assessment emphasises the openness and time depth, stating that:

"The landscape reflects the Tudor and Parliamentary enclosure movements through its pattern of large geometric fields small red brick villages with limited road connections, and a strong sense of 'emptiness'. The farmed landscape retains a robust rural character, showcasing many historic features, particularly ridge and furrow formations and deserted village sites."

3.17 Key characteristics of the LCA include:

- **Natural:** Oxford Canal providing important riparian habitats and recreational resources.
- **Cultural** Time depth: Historic character, including enclosed fields, veteran trees and area of archaeological interest.

- **Perceptual** sounds: High levels of tranquillity.
- **Perceptual** sights: Strong rural quality, characterised by large areas of countryside.

3.18 These characteristics identify landscape value factors that influence the sensitivity of the landscape and have been considered within the assessment at Section 4 of this report.

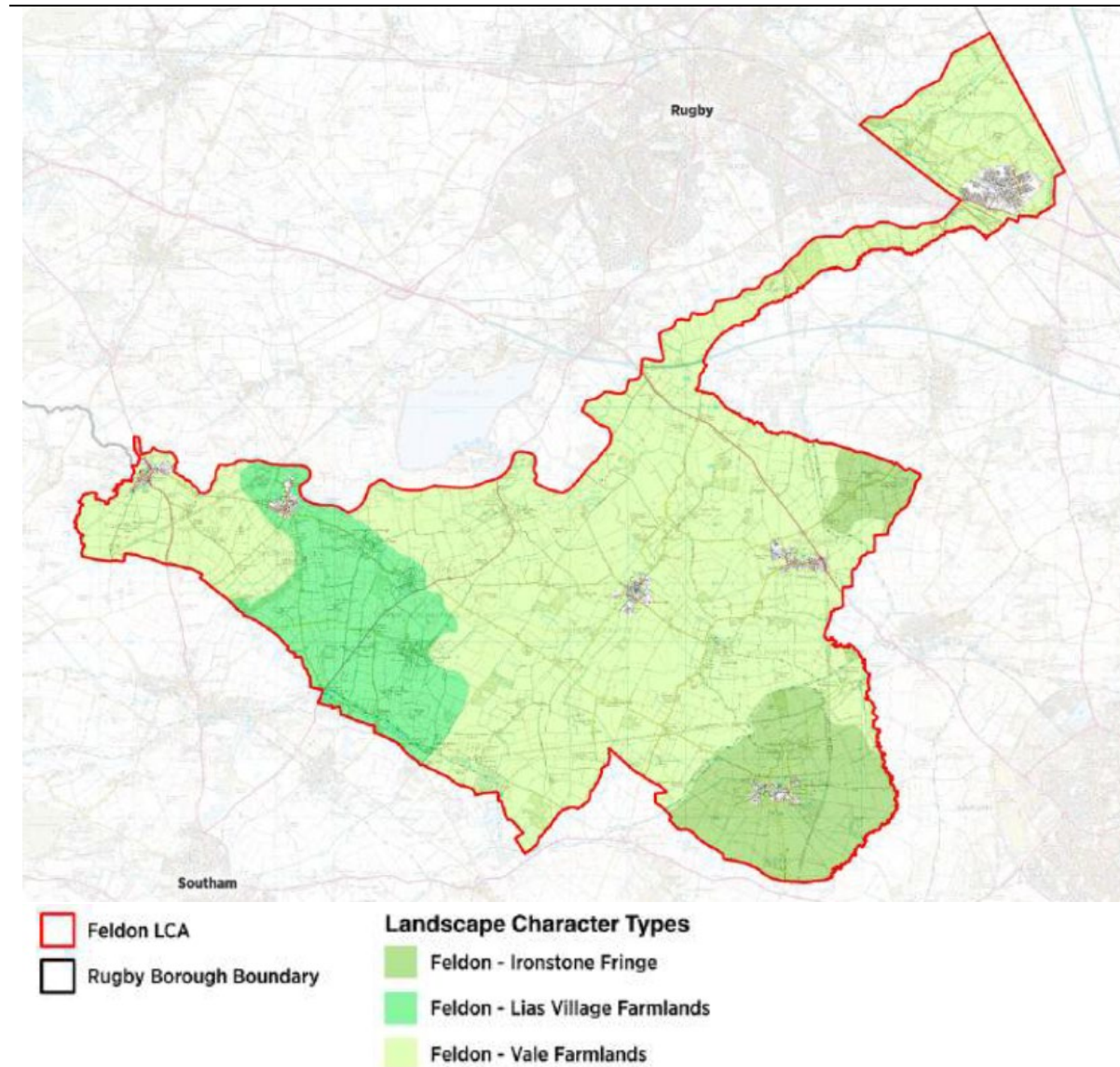


Figure 3-2: Feldon LCA and constituent LCTs, - Rugby Borough Landscape Character Assessment

FELDON - VALE FARMLANDS LANDSCAPE CHARACTER TYPE

3.19 The land within the valley is classified as the Feldon – Vale Farmlands LCT. Key characteristics include:

- Flat, open hedged landscapes with few roads or settlements

- Largely intact pattern of medium to large-sized geometric fields bound by hawthorn hedges and little tree cover
- Wide views of the rising ground and a strong impression of sky and space
- Villages typically few and far between and often consist of small 'open' clusters of farmsteads and dwellings.
- Deserted medieval villages remain in some areas.
- The pastoral and hedged character should be conserved and restored.

IRONSTONE FRINGE LANDSCAPE CHARACTER TYPE

3.20 Barby Hill lies within the Ironstone Fringe LCT which is characterised by the following:

- Prominent ironstone hills.
- Pockets of permanent pasture with ridge and furrow.
- Steep hillsides of semi-natural grassland and scrub.
- Strongly hedged field pattern creating a relatively strong sense of enclosure in the open, intensively farmed landscape.

LANDSCAPE GUIDELINES

3.21 Landscape guidelines for the planning, management and protection of the distinctiveness of the Feldon LCA landscapes include the following:

- Conserve the structure and remote rural character, particularly the Ironstone Fringe.
- Conserve the diversity and local distinctiveness, particularly of the Lias Village Farmlands.
- Protect and manage the historic character, settlement pattern and features of Feldon, especially archaeological sites and heritage interest such as deserted settlements and ridge-and-furrow sites, ancient woodland, farmsteads and country houses.
- Enhance educational and recreational experience for urban and rural communities.
- Maintain and protect high levels of tranquillity.

DAVENTRY LANDSCAPE CHARACTER ASSESSMENT

3.22 The Rainsbrook Valley includes land that is situated within West Northamptonshire Borough, and which has been assessed by the Daventry Landscape Character Assessment, 2017.

VALE OF RUGBY LANDSCAPE CHARACTER AREA 19B.

3.23 The Vale of Rugby LCA includes land on the edge of Barby Hill, including the Dunchurch Pools Marina, Onley Prison the Oxford Canal and land to the south of the Rains Brook, as illustrated on the extract at **Figure 3.3.**

3.24 Beyond the Rainsbrook Valley, the LCT extends to include DIRFT and land to the east, including the M1 and A14 corridors and Yelvertoft.

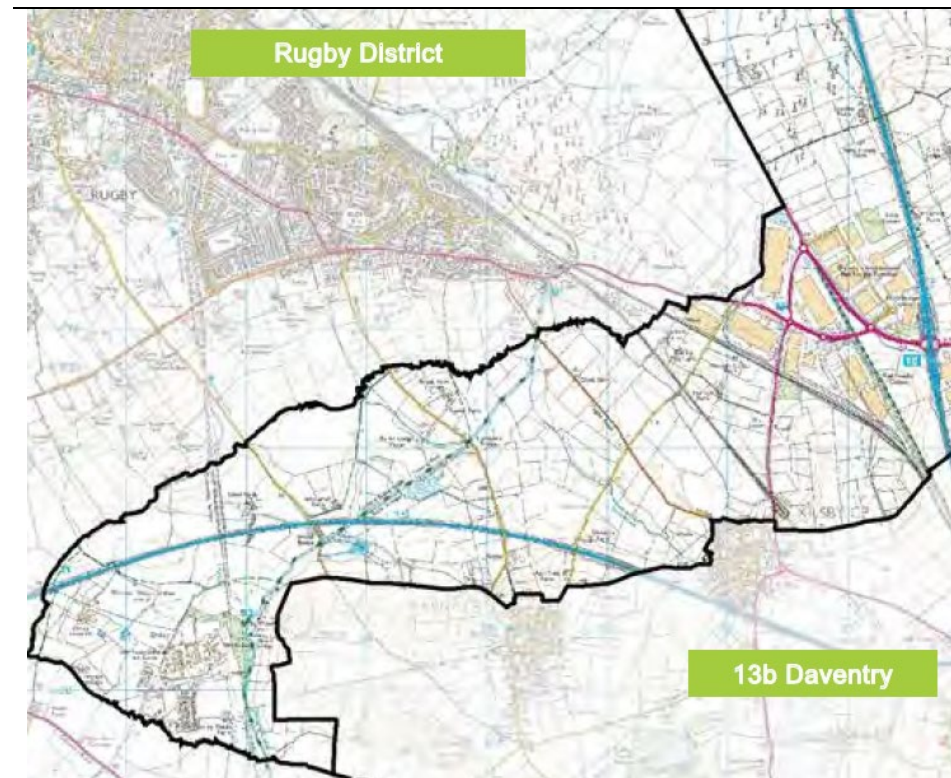


Figure 3-3: Vale of Rugby LCA 19B - Daventry Landscape Character Assessment

Key Characteristics / Description

3.25 The description for the Vale of Rugby LCA includes the following characteristics and features. The overriding character is of a broad, expansive flat or very gently sloping agrarian landscape with limited settlement and a quiet rural character:

- Generally flat and open character with wide panoramas across an expansive landscape.
- To the south, the vale is formed by the Rainsbrook Valley, described as a shallow valley between higher ground at Barby and Kilsby to the south and Rugby to the north.
- Minor undulations occur associated with the watercourses that drain the vale and have eroded shallow valleys.
- The Oxford Canal is designated as a Conservation Area and forms an important visual component of the landscape.
- Limited woodland cover, except for trees to hedgerows, field boundaries and tree-lined canals and railway lines.
- Open views towards higher ground.
- Smaller scale pastoral fields present around fringes of settlements.
- Ridge and furrow is a key feature around villages.

Landscape Strategy

3.26 The landscape strategy for the LCA include the following which are of relevance to the Rainsbrook Valley:

- New development should retain the simple, open and mostly rural character of the Vale of Rugby.
- Areas of extensive development outside the M1 and A5 corridors would be inappropriate and undermine the rural character.
- Patterns of trees along watercourses, canals and roads are important local features.
- The character area is part of the Rainsbrook Valley south of Rugby. Change along the fringes of Rugby that increase the prominence of development across this landscape would adversely affect its character.

LANDSCAPE CHARACTER – ADDITIONAL AREA

3.27 The southern extents of the Rainsbrook Valley, within the Additional Area identified by Incola (Chapter 2), share many of the key characteristics and features identified within the published landscape character assessments and outlined above.

3.28 Being situated away from urban edge and development at Rugby, and south of the M45 the landscape is more tranquil than those areas on the urban fringe and within the valley further to the north. This is especially the case along the Oxford Canal as it passes the base of Barby Hill, with views across medieval field systems on the gently undulating slopes towards the distinctive form of the hill on the skyline. This is illustrated by the photograph at **Figure 3.4**, taken from the Oxford Canal Walk Long Distance Trail.



Figure 3-4: Views from the Oxford Canal towards the southern slopes of Barby Hill

3.29 The valley here comprises a patchwork of fields defined by an intact pattern of hedgerows and a high proportion of ridge and furrow, lending time depth and a strong sense of place. The field pattern and areas of ridge and furrow and earthworks are illustrated by the aerial image and LiDAR topographical mapping at **Figure 3.5**.

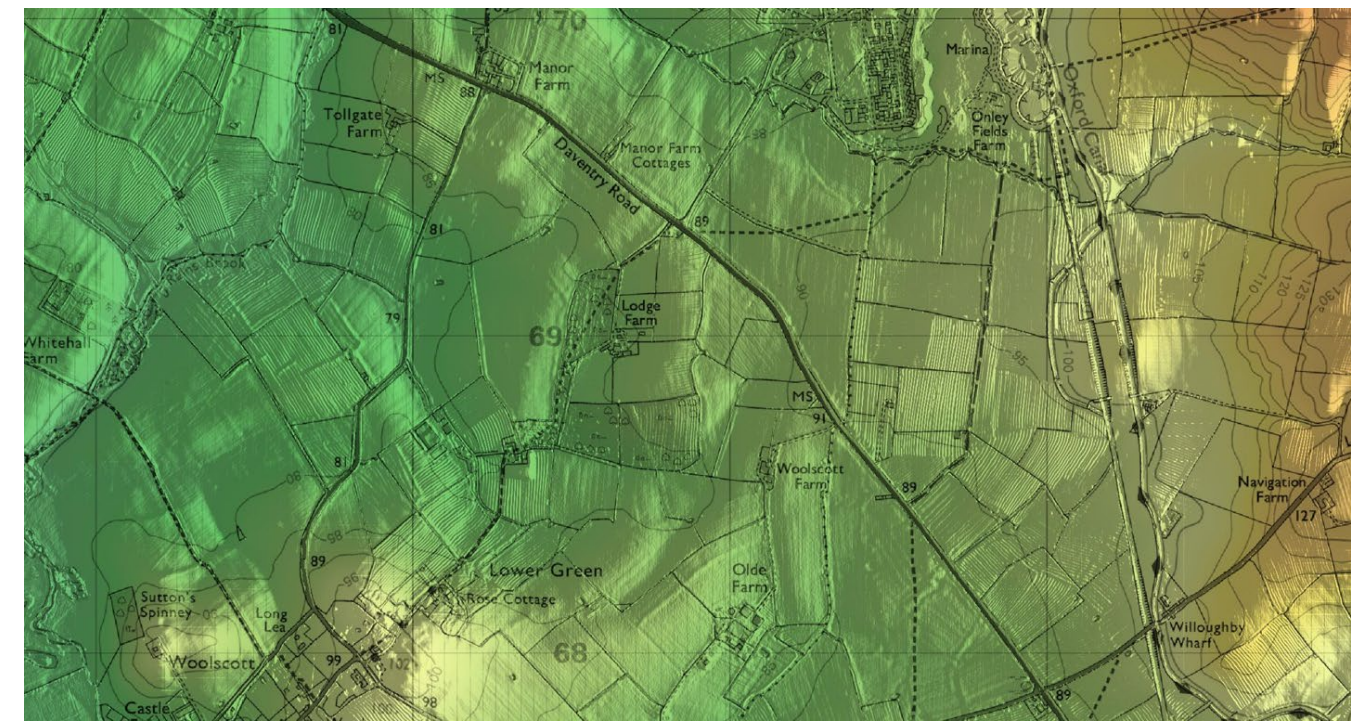


Figure 3-5: Field pattern and ridge and furrow south of Daventry Road and Dunchurch Pools

3.30 In expansive views across the Rainsbrook Valley from Toft Hill, south of Dunchurch, the open character and field pattern can be appreciated. As illustrated by the photograph at **Figure 3.6**, the promontories at Bunkers Hill and Woolscott contain the valley, set beyond the tree lined tributary that defines the assessment area, adjacent to the agricultural buildings at Toft Farm.



Figure 3-6: View from Toft Hill, looking southeast across the Rainsbrook Valley

3.31 In views from Barby Hill on the footpath leading up the hill from Oxford Canal bridge 81 (**Figure 3.7**), the undulating pastoral fieldscape on the lower slopes provides a setting to the wider valley to the south, with buildings at Woolscott Farm and Woolscott on the rising ground and the woodland at Bunker’s Hill forming a backdrop.



Figure 3-7: Views from Barby Hill, east of Dunchurch Pools Marina

3.32 The promontories and woodland that define the transition on the edge of the Rainsbrook Valley with the wider vale can be seen in the view from the bridge over the marina at **Figure 3.8** below.

3.33 The Oxford Canal and associated facilities and attractions, as well as public rights of way that connect with Rugby and the surrounding villages provide a well-used and valued recreational resource within the wider Rainsbrook Valley.



Figure 3-8: Views across the valley from the Dunchurch Pools Marina bridge

4 LANDSCAPE SENSITIVITY ASSESSMENT – ADDITIONAL AREA

- 4.1 Landscape sensitivity is a combination of judgements of value and susceptibility to a specific type of change or proposed development.
- 4.2 The susceptibility and value of the landscape within the Rainsbrook Valley is assessed below. This includes the findings of the 2025 Rainsbrook Valley Landscape Sensitivity Assessment, as well as an assessment of the Additional Area identified by Incola that includes the remainder of the valley (as defined at Section 2 of this report). The combined areas are illustrated on **Plan 4** and extract at **Figure 4.1**.

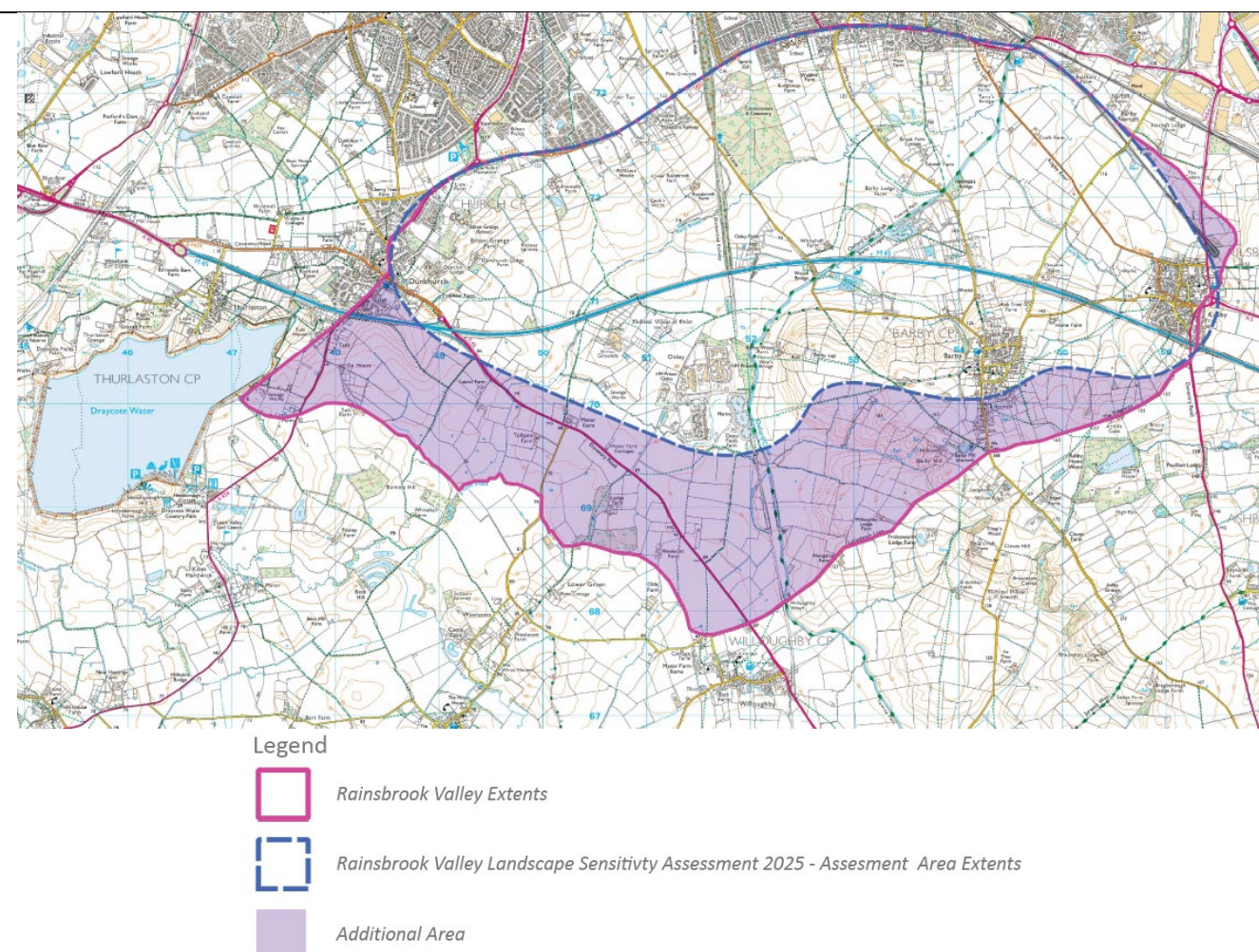


Figure 4-1: Rainsbrook Valley - Combined Assessment Areas

LANDSCAPE SUSCEPTIBILITY

- 4.3 Landscape susceptibility is defined by the Guidelines for Landscape and Visual Impact Assessment¹, as:

"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"

- 4.4 In recognition that susceptibility is linked to both the baseline and type of development proposals, when defining the susceptibility of the Rainsbrook Valley, the sensitivity assessment considered this against residential-led schemes of over 50 dwellings to reflect "major development".

RAINSBROOK VALLEY LANDSCAPE SENSITIVITY ASSESSMENT, 2025

- 4.5 The Rainsbrook Landscape Sensitivity Assessment concludes that the Rainsbrook Valley, when taken as a whole, has a **high susceptibility** to residential development of over 50 dwellings.
- 4.6 The assessment recognises that there may be localised areas of lower or moderate susceptibility, where topography and existing or proposed vegetation may provide screening. Such areas are identified as being located beyond the northern ridge line and abutting Ashlawn Road on the edge of the Rugby built up area. Susceptibility may also be lower proximate to previously developed land, such as at HMP Onley.
- 4.7 The analysis of susceptibility identifies the following factors that have informed the assessment of there being an overall high susceptibility to residential development within the Rainsbrook Valley:
- The valley is experienced as a rural landscape, with clear physical and visual demarcation from the large, neighbouring conurbation.
 - Housing development would be experienced as an eye-catching and incongruous form across much of the Rainsbrook Valley.
 - This would be most obvious at the valley bottom and across southern slope, where the land is devoid of such development and with extensive visibility to and from the surrounding areas.
 - The northern slopes in closer proximity to Rugby are also identified a susceptible, where development would be prominent and cascade down the rural valley side.

ADDITIONAL AREA

- 4.8 The Additional area within the Rainsbrook Valley beyond that identified and considered by the sensitivity assessment 2025 is also of a **high susceptibility**.

¹ Guidelines for Landscape and Visual Impact Assessment, Third Edition, Landscape Institute and IEMA, 2013

Table 4-1: Analysis of Landscape Value Factors – Assessment Area and Wider Rainsbrook Valley

Landscape Value Factor	Landscape Sensitivity Assessment, 2025 Findings for Assessment Area	Wider Area within Rainsbrook Valley Findings for Additional Area (balance of Rainsbrook Valley)
Natural Heritage	<p>Moderate Contribution</p> <p>Habitat and biodiversity is assessed as being fairly typical for its agricultural landscape type.</p> <p>The assessment recognises localised areas of elevated quality, including:</p> <ul style="list-style-type: none"> • local nature reserves • wildlife sites; and • country parks. <p>Natural Heritage and biodiversity value draws from individual contributions of landscape features:</p> <ul style="list-style-type: none"> • Deciduous woodland; • Hedgerow network with areas of well-preserved hedges and trees • Former agricultural ponds • Areas of improved grassland • Riparian habitats and wildlife corridors provided by the Rains Brook and Oxford Canal <p>Clearly defined geomorphology of the valley adds value, with Barby Hill a particular point of interest demarcating the western end of the southern ridge.</p> <p>Detracting Features identified include:</p> <ul style="list-style-type: none"> • Onley Prison • M45 motorway 	<p>Moderate Contribution</p> <p><u>Ecological Designations</u></p> <p>The Additional Area includes a variety of habitats, as reflected by the local eco sites that extend along the southern edges of the valley at the transition with the wider vale. These include areas of semi-improved neutral grassland alongside the Oxford Canal (site 14/56), areas associated with the abandoned contour canal and great central railway line (site 17/56) and Woolscott Lodge Field (site 18/56)</p> <p><u>Priority Habitats</u></p> <p>Dunchurch Pools Marina is not mentioned within the Sensitivity Assessment.</p> <p>The marina includes extensive areas of land where the creation and management of BAP priority habitats link with the existing riparian green and blue infrastructure along the canal and former railway. These habitats, including areas of parkland and accessible open spaces form an integral part of the redevelopment of the former railway sidings as a recreation and tourism hub at the heart of the canal network. This includes the creation and management of areas of woodland, meadow and wetlands.</p> <p><u>Deciduous Woodland</u></p> <p>The land on the edge of the assessment area and within the Additional Area includes a higher degree of deciduous woodland cover than across the rest of the valley, including at the following locations:</p> <ul style="list-style-type: none"> • Onley Prison • Alongside the Oxford Canal • Alongside and as part of Dunchurch Pools Marina; • Lodge Farm; • Whitehall Farm; and • Bunkers Hill

- 4.9 The higher ground at Toft Hill at the southwestern edge of the valley is prominent in views 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.
- 4.10 Similarly, Barby Hill to the southeast forms a prominent backdrop and distinctive landform and setting to the valley and is of a high susceptibility.
- 4.11 The wider valley area is remote from the built edge of Rugby and rural in character, comprising an open fieldscape defined by hedgerows and hedgerow trees with development limited to scattered farmsteads and individual dwellings.
- 4.12 Onley Prison and housing at Onley Park is contained at the base of Barby Hill, set amongst blocks of woodland and do not read as part of the open, rural agricultural landscape that crosses the valley.

LANDSCAPE VALUE – COMPARATIVE ASSESSMENT

- 4.13 The Rainsbrook Valley Sensitivity Assessment 2025 undertakes an assessment of the landscape value of the land within the study area / assessment area. This has been based upon an analysis of the nine “value factors” set out within the Landscape Technical note 02-21 ‘Assessing Landscape Value Outside National Designations’.
- 4.14 Landscape value is defined as the value attached to different landscapes by society. A landscape may be valued by different stakeholders for a whole variety of reasons.
- 4.15 An overview of the findings of the Rainsbrook Valley Landscape Sensitivity Assessment 2025 is set out at Table 4.1, along with an assessment of how the Additional Area, that forms the balance of the Rainsbrook Valley, contributes to each of the factors.
- 4.16 The assessment also identifies features or aspects of the landscape that have either not been identified, or which may be indicators of greater landscape value than that attributed by the sensitivity assessment 2025.

Landscape Value Factor	Landscape Sensitivity Assessment, 2025 Findings for Assessment Area	Wider Area within Rainsbrook Valley Findings for Additional Area (balance of Rainsbrook Valley)
		<p>The woodland in these areas includes that on promontories and undulating land alongside the southern edge of the valley, contributing to the definition of the area.</p> <p>There is also significant tree planting alongside the disused route of the Great Central Railway, contributing to the green infrastructure and wildlife corridors at a landscape scale.</p> <p>This is reflected by the Oxford Canal being recognised as a part of the strategic green and blue infrastructure networks within the Borough.</p> <p><u>Field System</u> Outside the Assessment Area 2025 and within the Additional Area, the Rainsbrook Valley includes large areas of intact field systems characterised by the historic medieval field pattern of ridge and furrow with associated hedgerows and trees to field boundaries, along with field ponds. Land use includes pastureland and meadows.</p>
Cultural Heritage	<p>Strong Contribution</p> <p>The Assessment Area 2025 contains a collection of nationally and locally significant assets, including Registered Parks and Gardens, scheduled monuments, conservation areas and listed buildings.</p> <p>These include the historic designed landscapes of Bilton Grange and Dunchurch Lodge to the northwest of the area, as well as Ashlawn House.</p> <p>Historic, nucleated hilltops settlements at Kilsby, Barby and Dunchurch are focal points of heritage buildings, spaces and features.</p> <p>Medieval landscape evident in archaeological earthworks, including scheduled monuments at abandoned medieval village at Onley and Barby Castle. Ridge and furrow earthworks illustrate</p>	<p>Strong Contribution</p> <p><u>Oxford Canal</u> The Oxford Canal in West Northamptonshire is designated as a Conservation Area in recognition of its historic and architectural importance.</p> <p>The canal within Rugby Borough is of no less historical significance. Within the Additional Area, south of Dunchurch Pools Marina, this includes an abandoned section of the contour canal, dating from 1790 located at the base of Barby Hill. A cutting was made at Onley circa 1830, severing the contour, which survives as a piece of history in the landscape.</p> <p>The canal within the Rainsbrook Valley forms part of the Braunston pound, connecting the Oxford Canal to the Grand Union Canal and the</p>

Landscape Value Factor	Landscape Sensitivity Assessment, 2025 Findings for Assessment Area	Wider Area within Rainsbrook Valley Findings for Additional Area (balance of Rainsbrook Valley)
	<p>past agricultural practices across the valley. Rarely found in sufficient concentration to form a legible wider field system.</p> <p>Canal recognised as forming a corridor of industrial heritage interest, designated as a conservation area within West Northamptonshire, but not Rugby Borough.</p> <p>Historic farmsteads scattered across valley, typical of character of Dunsmore & Feldon landscape. Includes Barby Wood Farm on Barby Hill.</p>	<p>UK's northern, southern, eastern and western inland waterway systems.</p> <p><u>Great Central Railway</u> The Great Central Railway, which was closed in 1969 crosses the Rainsbrook Valley and is a distinctive tree lined linear landscape feature, of heritage value. Historic infrastructure relating to the railway, such as the engine shed at Onley, still survive in the landscape.</p> <p><u>Medieval Field Systems</u> Within the Rainsbrook Valley, outside of the Assessment Area 2025, (the Additional Area) there are areas of ridge and furrow and medieval field pattern that provide legible field systems within the landscape, adding time depth.</p> <p>These include the fields at the base of Barby Hill alongside the Oxford Canal, extending into the wider valley around Woolscott Farm and Lower Green, south of Lodge Farm and alongside the Rains Brook and tributaries. The areas of ridge and furrow and medieval field systems are clearly shown on the Topography Plan.</p>
Landscape Condition	<p>Moderate Contribution</p> <p>There are wide areas of intact historic landscape and key elements are generally well preserved.</p> <p>The general landscape structure is pre-20th century and a pattern of mid-sized regular-shaped, hedgerow bound fields.</p> <p>Notable areas of extensive modern field amalgamation are identified on land north of the M45, between Biltong Grange and Barby Moorings. Whilst retaining an open agricultural character, these areas are assessed as being of a morphology that is inconsistent with the tighter grain of the historic landscape character</p> <p>Localised effects of significant detractors, including the M45 and HMP Onley. The</p>	<p>Moderate to Strong Contribution</p> <p>Large areas of the Additional Area comprise an intact historic field pattern, defined by a strong network of mature hedgerows and trees, and with few detracting features and influences present.</p> <p>These include the southwestern slopes of Barby Hill and land extending along the valley bottom to the southwest of Daventry Road, between Willoughby and Dunchurch.</p> <p>These areas are also less influenced by detracting features, being an open, agricultural landscape.</p> <p>Houses at Onley Park and Onley Prison have a limited influence on the landscape within the</p>

Landscape Value Factor	Landscape Sensitivity Assessment, 2025 Findings for Assessment Area	Wider Area within Rainsbrook Valley Findings for Additional Area (balance of Rainsbrook Valley)
	assessment recognises that the physical and visual presence of these features is highly variable within the Assessment Area 2025 / across the Rainsbrook Valley.	valley, being low lying and contained by woodland planting.
Distinctiveness	<p>Moderate Contribution</p> <p>The assessment recognises that the Rainsbrook Valley broadly embodies the typical characteristics identified in the landscape character assessments.</p> <p>Despite this, the assessment recognises that the valley is "Highly distinctive in its local context", specifically in the abrupt change in character and transition from suburban townscape to wide, open valley countryside and distinctive qualities.</p> <p>Barby Hill is identified as a specific local landmark that is distinctive</p> <p>The assessment considers the Rainsbrook Valley to have a well-defined local sense of place.</p>	<p>Moderate to Strong Contribution</p> <p>As recognised by the assessment, Barby Hill is a distinctive local landmark. Along with the intact historic medieval system pattern, Oxford Canal and former Great Central Railway, these features to the southern and eastern edge of the valley create a strong sense of place in the landscape and setting of the valley.</p> <p>Whilst the assessment focusses on the experience of the valley when traveling south from Rugby, the southern part of the valley also makes a strong contribution to the setting and arrival to Dunchurch when approaching from the south along Daventry Road and the A426, with the village on the hill and church forming distinctive landmarks.</p>
Recreational	<p>Moderate Contribution</p> <p>The assessment recognises that there is an extensive network of footpaths and bridleways offering long-distance routes across the valley, and which are accessible to the population of Rugby.</p> <p>The assessment considers that recreational access is constrained by poor connectivity and lack of east-west links.</p> <p>An emphasis is placed on the rights of way that descend the valley slopes and cross the valley floor, and does not fully recognise the connectivity with the recreational routes along the canal network that runs along the valley.</p> <p>Cross valley views towards Barby Hill are identified from footpaths to the north.</p>	<p>Strong Contribution</p> <p>The Oxford Canal Walk and Great Central Walk run along the valley providing views along the valley, as well as connections with footpaths that cross it along its length.</p> <p>There are a number of rights of way crossing the valley between Barby Hill and Dunchurch, including to the south of the valley beyond the Assessment Area 2025, including those south of Daventry Road. These rights of way focus views along the valley, providing connectivity with the villages on the edge of the valley and within the wider vale.</p> <p>Whilst the assessment mentions the Oxford Canal, including the waterway and towpath, it does not emphasise the recreational importance of the canal network and significance that it has locally. The Rainsbrook Valley is part of the 3</p>

Landscape Value Factor	Landscape Sensitivity Assessment, 2025 Findings for Assessment Area	Wider Area within Rainsbrook Valley Findings for Additional Area (balance of Rainsbrook Valley)
		<p>Junctions Area, where 10% of all UK canal boats are moored.</p> <p>Although the assessment makes reference to Hillmorton Wharf and Barby Moorings, it makes no mention of Dunchurch Pools Marina, which is a significant tourism resource, providing a variety of facilities, including moorings, café and publicly accessible parkland linking with the canal and five public footpaths, including the Oxford Canal Walk Long Distance Trail.</p>
Perceptual (scenic)	<p>Moderate Contribution</p> <p>The assessment recognises the collective contribution that the 'visually harmonious' patchwork agricultural landscape and multiple features makes to an elevated sense of scenic quality.</p> <p>Views from the southwest of the Assessment Area 2025 across the wider valley landscape and beyond are identified as a significant exception to the remainder of the valley (north of Barby Hill) where views are contained by the valley topography.</p> <p>The M45 and HMP Onley are identified as having localised effects, although both features are well contained by mature planting. The prison detracts from scenic quality locally when looking northeast from Barby Hill or across the valley from the northern slopes.</p>	<p>Moderate to Strong Contribution</p> <p>The land within the Rainsbrook Valley outside the Assessment Area 2025, the Additional Area, includes areas of unspoilt historic landscape on the southern slopes of Barby Hill, alongside the Oxford Canal and south of Dunchurch Pools Marina. Here, the medieval field system, and filed pattern defined by hedgerows, trees and riparian corridors remain intact, presenting an intimate and attractive landscape.</p> <p>This part of the valley also facilitates wider expansive views across the valley towards the Leam and wider vale landscape from the higher ground at Barby Hill.</p> <p>The Additional Area land also facilitates the significant views identified by the assessment from Toft Hill at Dunchurch.</p>
Perceptual (wildness and tranquillity)	<p>Weak Contribution</p> <p>The assessment considers the landscape within the Assessment Area 2025 as making a weak contribution due to the presence of substantial modern forms of infrastructure and development.</p> <p>These include development on the northern ridge on the edge of Rugby and proximity to the large urban area, as well as the localised impacts of the M45 and Onley Prison.</p>	<p>Moderate Contribution</p> <p>To the south and west of Barby Hill, the landscape alongside the canal is contained by the landform and mature trees and hedgerows alongside the canal and line of the former Great Central Railway. This creates a secluded and tranquil space, away from the urban influences.</p> <p>Views from Barby Hill to the south across the valley and wider vale landscape beyond are relatively unspoilt, separated from the urban edge of Rugby and providing a greater sense of</p>

Landscape Value Factor	Landscape Sensitivity Assessment, 2025 Findings for Assessment Area	Wider Area within Rainsbrook Valley Findings for Additional Area (balance of Rainsbrook Valley)
	Localised areas of increased tranquillity identified include the Ashlawn Cutting LNR, Diamond Woods Country Park and Rainsbrook Cemetery. All of these are situated on the northern edge of the valley, adjacent to the edge of Rugby town.	remoteness and experience of the agricultural landscape and rolling landform leading towards Cleves Hill to the south and Napton beyond the vale.
Associations	<p>Weak to Moderate Contribution</p> <p>The assessment does not identify any specific associations to the Rainsbrook Valley when considered as a whole across well-known literature, poetry, artwork, TV/film or music that contribute to the perceptions of the landscape, nor links to notable historic events or famous persons.</p> <p>Significant historical associations are identified for specific buildings and locations and do not have a meaningful influence on the landscape character of the assessment area</p>	<p>Moderate Contribution</p> <p>The poet Rupert Brooke, who was born and raised in Rugby (Hillmorton) is acknowledged as basing his poem, "The Chilterns" on walks from Hillmorton, along the Oxford Canal and up Barby Hill, from where there are views across "The slumbering Midland Plain"</p> <p>These are the same views as described above in relation to the perceptual aspects of the landscape, at the transition of the Rainsbrook Valley with the wider vale of the Leam.</p> <p>Barby Hill features in Tom Brown's School Days episode 'Hare & Hounds'. The author, Thomas Hughes, having attended Rugby School and undertaken cross country runs up the hill.</p> <p>The Oxford Canal at the Rainsbrook Valley also features in popular TV programs such as Great Canal Journeys, Narrow Boat Diaries and Narrow Escapes.</p>
Functional	<p>Weak to Moderate Contribution</p> <p>The functionality of the landscape is identified as being primarily agricultural.</p> <p>Value attributed by the assessment draws on the areas of elevated agricultural classification, which include land of Very Good quality on the southern fringes of Rugby, and Good to Moderate across the valley and wider area.</p>	<p>Moderate Contribution</p> <p>Land alongside the Oxford Canal and waterways provide green and blue corridors and multifunctional green infrastructure network that runs through the valley.</p> <p>In addition to the waterways, the riparian vegetation and diverse range of habitats alongside the canal, including woodland, riparian corridors, wetlands and meadows provide functionality and ecological links at a landscape scale.</p>

Landscape Value Factor	Landscape Sensitivity Assessment, 2025 Findings for Assessment Area	Wider Area within Rainsbrook Valley Findings for Additional Area (balance of Rainsbrook Valley)
		These green infrastructure networks extend along the hedgerows and connect areas of woodland within the valley, as well as the riparian corridors alongside the Rains Brook and tributaries that cross the landscape within the valley beyond the assessment area.

SUMMARY

4.17 The Rainsbrook Landscape Sensitivity Assessment 2025 concluded that the part of the valley assessed within the Assessment Area 2025 was of a "Good" value. This was based upon the above analysis, and is summarised within the document as being for the following reasons:

- Multiple designated cultural assets
- Good levels of recreational access through extensive network of public footpaths drawing significant amenity value from the local landscape character
- Scenic qualities of the rural valley landscape
- Local distinctiveness of the valley relative to suburban Rugby
- localised contributions from perceptual, functional and associations factors
- Impact of detracting features (HMP Onley and M45) localised and well-mitigated by associated landscape strategies.

4.18 The valley as a whole is described by the assessment as being,:

"a scenic rural landscape where the patchwork of agricultural land uses, historic settlements and farmsteads, and landscape-focussed recreational amenity remain the predominant characteristics."

4.19 Although the sensitivity assessment recognises the strong contribution that the Rainsbrook Valley as a whole makes to recreation, it does not take into account the full contribution that the Oxford Canal makes to recreation and tourism, including the facilities and landscape features associated with Dunchurch Pools Marina.

Additional Area – Balance of the Rainsbrook Valley

4.20 The comparative assessment of the Additional Area of the Rainsbrook Valley, the balance of the Wider Assessment Area, undertaken by Incola has demonstrated that these areas are also of a comparable, or greater landscape value than that which was assessed by the Rainsbrook Valley Sensitivity Assessment 2025.

4.21 Key valued aspects of the landscape that are present within the Additional Area, include:

- **Strong contribution** to cultural heritage associated with the canal, railway and areas of Intact medieval field systems defined by hedgerows and trees, adding time depth to the landscape;
- **Moderate contribution** to natural heritage associated with eco sites, woodland within the wider valley landscape and diverse habitats at Dunchurch Pools and alongside the canal;
- **Moderate to Strong Contribution** to perceptual aspects, including expansive views across the valley and wider vale from Barby and Toft Hills and areas of tranquillity alongside the Oxford Canal;
- **Strong contribution** associated with the recreational and tourism value of the Oxford Canal; and
- **Moderate to strong contribution** to the distinctive aspect of the landscape, including Barby Hill, historic field systems, and the southern part of the valley to the setting of Dunchurch and Barby Hill when heading north.

LANDSCAPE SENSITIVITY

RAINSBROOK VALLEY LANDSCAPE SENSITIVITY ASSESSMENT, 2025

- 4.22 Combining the judgements of landscape value and susceptibility, the sensitivity assessment 2025 concludes that, for the majority of the assessed area that falls within Rugby Borough, the Rainsbrook Valley is of a **High Sensitivity**.
- 4.23 This includes both the valley bottom and valley sides, and is primarily on account of the good landscape value and likelihood for any new development being prominent across a wide area.
- 4.24 The assessment recognises that some specific parcels may be of a high to medium or medium sensitivity, dependant on the development scenario (quantum, siting, design) and the containment by existing landform and vegetation and / or robust mitigation measures to limit visibility of development.
- 4.25 This reflects the findings of the Council’s 2017 Rainsbrook Valley Landscape sensitivity Study, which identified:
- High levels of sensitivity across the large majority of the valley sides; and
 - Potential for moderate or moderate / high sensitivity for specific areas along the northern ridge.
- 4.26 The assessment concludes with sensitivity mapping of land within the valley that lies within Rugby Borough north of the M45 (omitting the assessed area within Rugby Borough south of the M45).
- 4.27 As illustrated by the extract at **Figure 4.2**, a small area of land adjacent to the built edge of Rugby is identified as of high-to-medium sensitivity with the remainder of the land up to the authority boundary north of the M45 being of a high sensitivity.

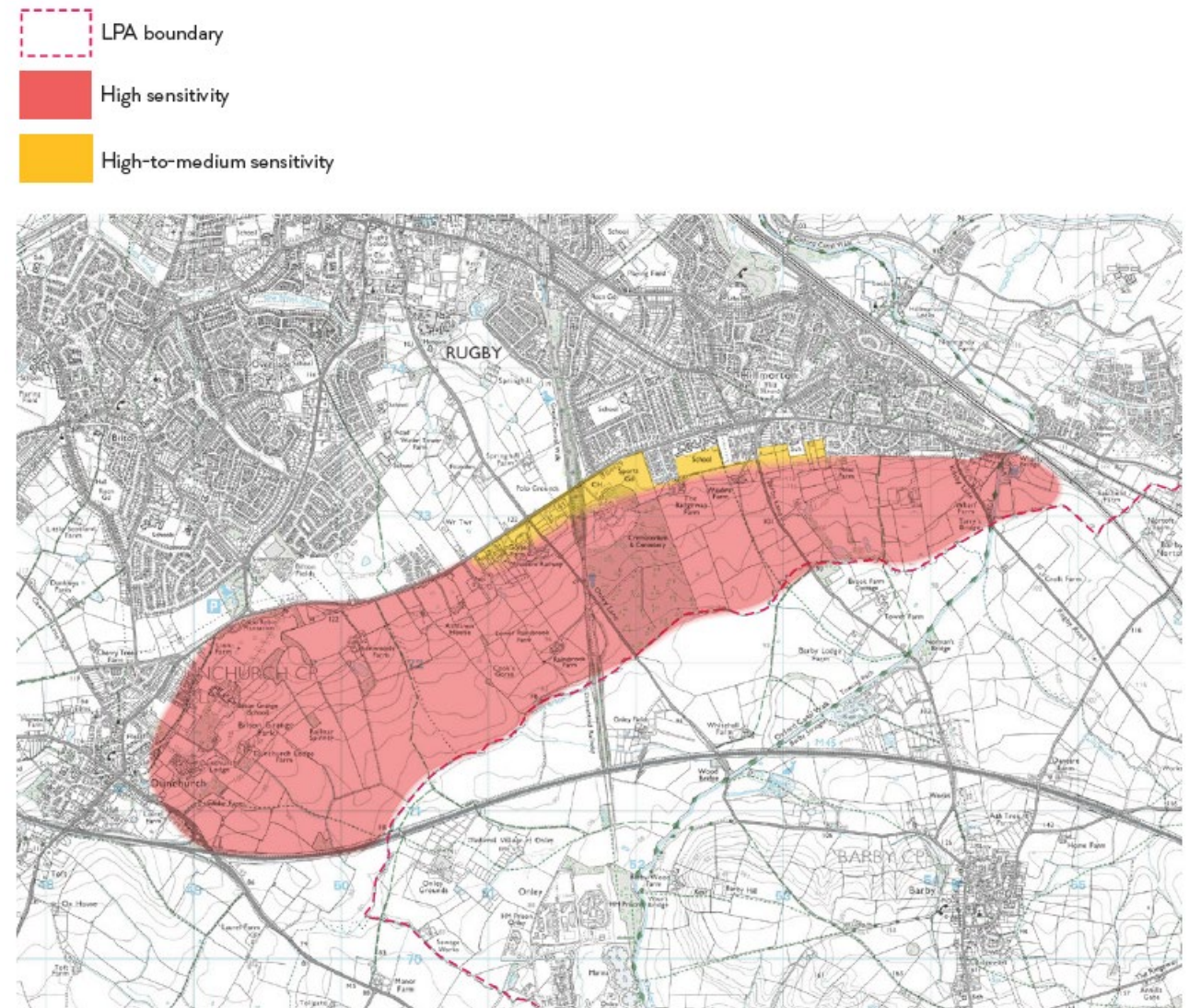


Figure 4-2: Rainsbrook Valley Landscape Sensitivity Assessment, 2025 - Sensitivity Mapping (extract)

- 4.28 Despite having assessed a more comprehensive area, to include land to the south of the Rains Brook, the northern part of Barby Hill, Onley and land south of the M45, the assessment has not included sensitivity mapping for the wider valley.
- 4.29 The 2025 assessment found that the full area assessed incorporates elements that are of higher value, including the patchwork agricultural landscape, distinctive landform of Barby Hill and views to and from the higher ground, recreational assets and cultural heritage, including the Oxford Canal and areas of historic field pattern and time depth across the valley landscape.
- 4.30 Notwithstanding that the 2025 assessment area does not extend to cover the full extent of the Rainsbrook Valley, this is a significant omission.

- 4.31 It is unclear as to why the whole of the area assessed has not been included, as the wider Rainsbrook Valley is of a high sensitivity for the reasons set out above and included within the assessment.

ADDITIONAL AREA – BALANCE OF THE RAINSBROOK VALLEY

- 4.32 Having undertaken a detailed comparative assessment for the balance of the Rainsbrook Valley omitted from the 2025 sensitivity assessment, the Additional Area, incorporating the southern slopes of Toft and Barby Hills and the valley bottom that extends between, it is clear that the wider valley is also of a **high landscape sensitivity**.
- 4.33 This reflects the recreational value of the canal network, public rights of way, extensive views across the valley from Toft Hill and Barby Hill and the strong cultural value, including the intact field patterns, medieval field systems incorporating extensive areas of ridge and furrow, hedgerows and tree cover.

5 SUMMARY AND CONCLUSIONS

- 5.1 This report has reviewed the Rainsbrook Valley Landscape Sensitivity Assessment, 2025 that has been prepared to inform and support policies and designations within the emerging Rugby Borough Local Plan 2025 – 2042.
- 5.2 Specifically, the assessment underpins the identification of the Rainsbrook Valley Landscape of Elevated Sensitivity within the draft Local Plan, a local landscape designation on the southern edge of Rugby that extends into part of the Rainsbrook Valley between the edge of the town and the M45 motorway.
- 5.3 The sensitivity assessment has utilised current methodology in line with guidance and good practice to identify the value and susceptibility of the Rainsbrook Valley and overall sensitivity to residential development.
- 5.4 When defining the assessment area within the Rainsbrook Valley, the assessment includes land within Rugby Borough, as well as Barby Hill and parts of the southern and eastern valley sides that are situated within West Northamptonshire. This reflects the valley landform, including the escarpment and plateau on the edge of Rugby to the north and ironstone fringe formed by Barby Hill to the south and east.

FINDINGS OF THE RAINSBROOK VALLEY LANDSCAPE SENSITIVITY ASSESSMENT, 2025

- 5.5 In line with guidance on assessing landscape value outside of designated landscapes, published by the Landscape Institute, the sensitivity assessment considers a range of nine landscape value factors: Natural heritage, Cultural heritage, Landscape condition, Associations, Distinctiveness, Recreational, Perceptual (scenic), Perceptual (wildness and tranquillity) and Functional.
- 5.6 Overall the assessment considers the Rainsbrook Valley to be above ordinary, and of “good” value.
- 5.7 The valley has been assessed as being of a high susceptibility to housing development of over 50 dwellings. This is due to the rural character and potential for development to be incongruous on the southern slopes and valley bottom due to the open nature of the landscape.
- 5.8 The sensitivity assessment concluded that the large majority of the area of the Rainsbrook Valley assessed, including the southern slopes and valley bottom, is of a high sensitivity.

ASSESSMENT OF THE BALANCE OF THE RAINSBROOK VALLEY

- 5.9 This report has used topographical mapping, analysis of LiDAR data and site visits to define the full extent of the Rainsbrook Valley, **Plan 3**.
- 5.10 It has found that the Rainsbrook Valley extends southwards from the area of the 2025 assessment to a line between Toft Hill in the west (identified in the landscape study 2017) and Barby Hill in the east. The

line marked by a series of promontories and tributaries within the catchment of the Rains Brook and leading to the transition to the vale beyond at the confluence with the River Leam.

- 5.11 Incola have identified the balance of the Rainsbrook Valley, the ‘Additional Area’, not included in the Rainsbrook Valley Landscape Sensitivity Assessment 2025 and undertaken a comparative landscape sensitivity assessment, using the same factors and criteria as the 2025 assessment.
- 5.12 This assessment found that the land within the balance of the Rainsbrook Valley, the Additional Area, is of the same high landscape sensitivity as the area assessed by the 2025 assessment.
- 5.13 The Additional Area, within the southern part of the valley, makes a strong contribution to the cultural heritage, distinctive and perceptual aspects of the landscape within the Rainsbrook Valley. This reflects the strong sense of place, rural character, extensive views, areas of medieval field systems and ridge and furrow, tranquillity and high recreation value associated with the Oxford Canal and public rights of way network.
- 5.14 The balance of the Rainsbrook Valley, the Additional Area, is assessed as of a **High Landscape Sensitivity**.

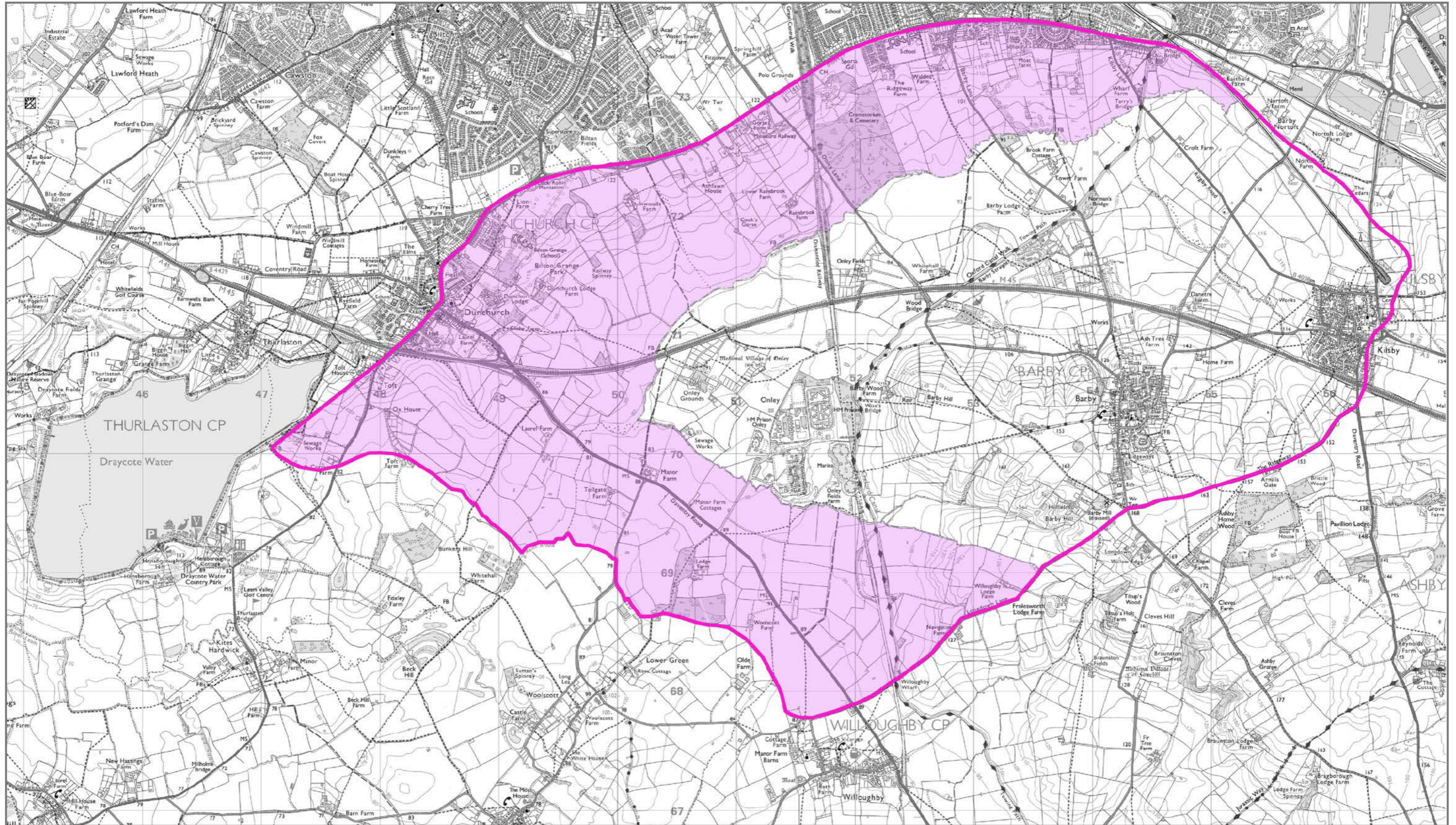
DEFINING THE LOCALLY DESIGNATED LANDSCAPE

- 5.15 Based upon the findings of the Rainsbrook Valley Landscape Sensitivity Assessment, 2025 and analysis within this report is concluded that the whole of the Rainsbrook Valley is of an overall **High Landscape Sensitivity**.
- 5.16 The extents of the Rainsbrook Valley falls within each of the LPA areas of Rugby Borough and West Northamptonshire. These include the combined extents of the area defined and assessed by the Rainsbrook Valley Landscape Sensitivity Assessment, 2025 and the land within the Additional Area as defined within this review and for which the comparative assessment has been undertaken.
- 5.17 The portion of the Rainsbrook Valley north of the M45 and within Rugby Borough has been taken forward to form the extents of the proposed Rainsbrook Valley Landscape of Elevated Sensitivity designation (draft Local Plan Policy EN3). This excludes the balance of the Rainsbrook Valley within Rugby Borough, also assessed as being of High Landscape Sensitivity.
- 5.18 The analysis presented in this report indicates that the whole of the Rainsbrook Valley within Rugby Borough, see map at **Appendix 1**, may meet the criteria for consideration as part of the proposed Rainsbrook Valley Landscape of Elevated Sensitivity designation (Local Plan Policy EN3).
- 5.19 Furthermore, as supported by both the Rainsbrook Valley Landscape Sensitivity Assessment, 2025 and analysis within this report, the Rainsbrook Valley within West Northamptonshire, including the southern valley sides and Barby Hill see map at **Appendix 1**, is also of a high landscape sensitivity and may therefore be considered as an area to be afforded similar recognitions within policy.

6 APPENDIX 1: EXTENT OF THE RAINSBROOK VALLEY

THE RAINSBROOK VALLEY WITHIN RUGBY BOROUGH

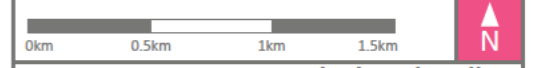
THE RAINSBROOK VALLEY WITHIN WEST NORTHAMPTONSHIRE



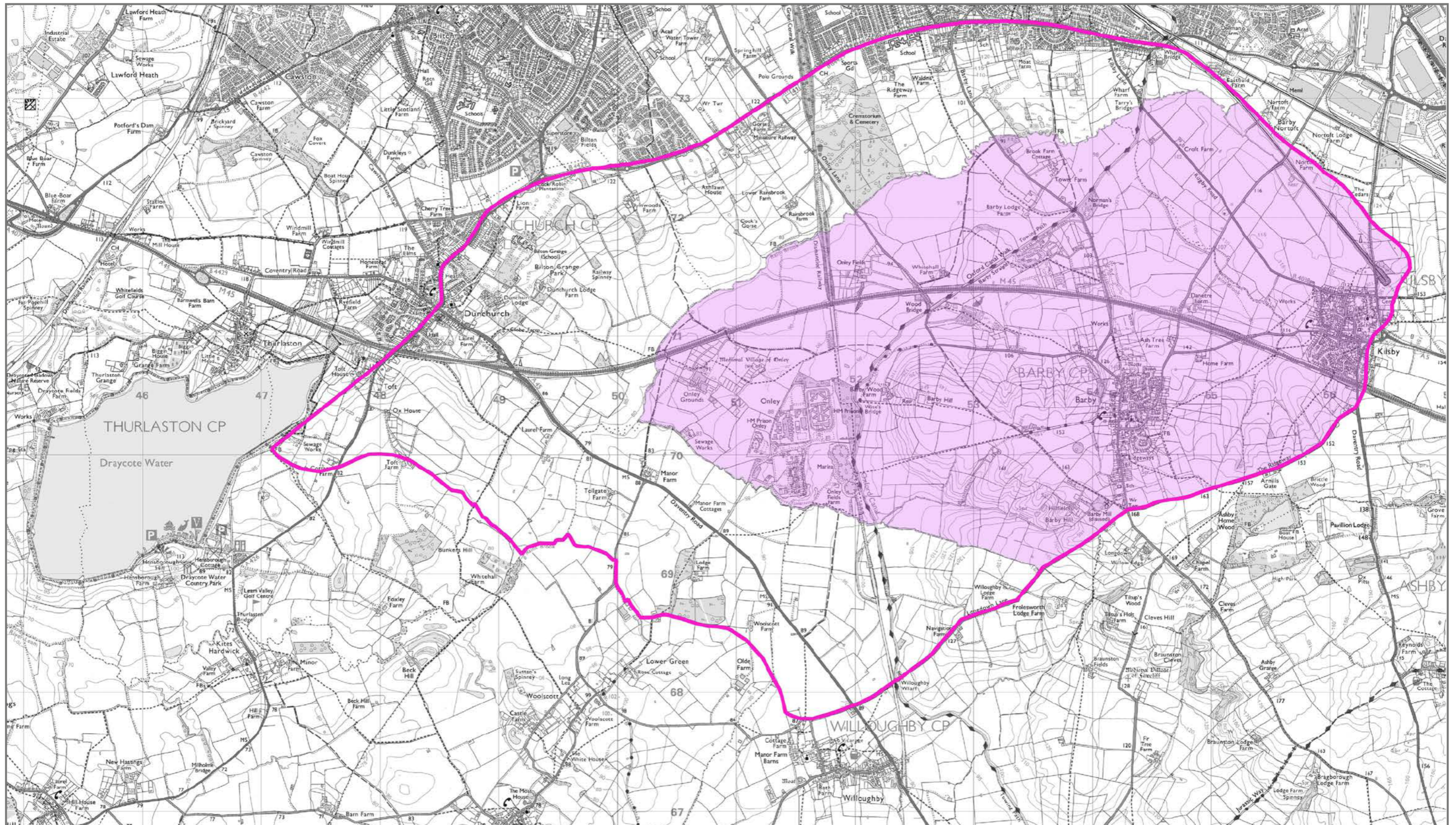
- Legend**
- Rainsbrook Valley
 - Rainsbrook Valley within Rugby Borough

The Rainsbrook Valley within Rugby Borough

Drawing Ref	Incola 1144 PI
Revision	-
Date	06/03/2026



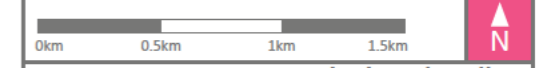
Rainsbrook Valley
 Landscape Sensitivity Assessment Review
 Incola 1144/R01
 06/03/2026



Legend

- Rainsbrook Valley
- Rainsbrook Valley within West Northamptonshire

The Rainsbrook Valley within West Northamptonshire	
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Revision	-
Date	06/03/2026



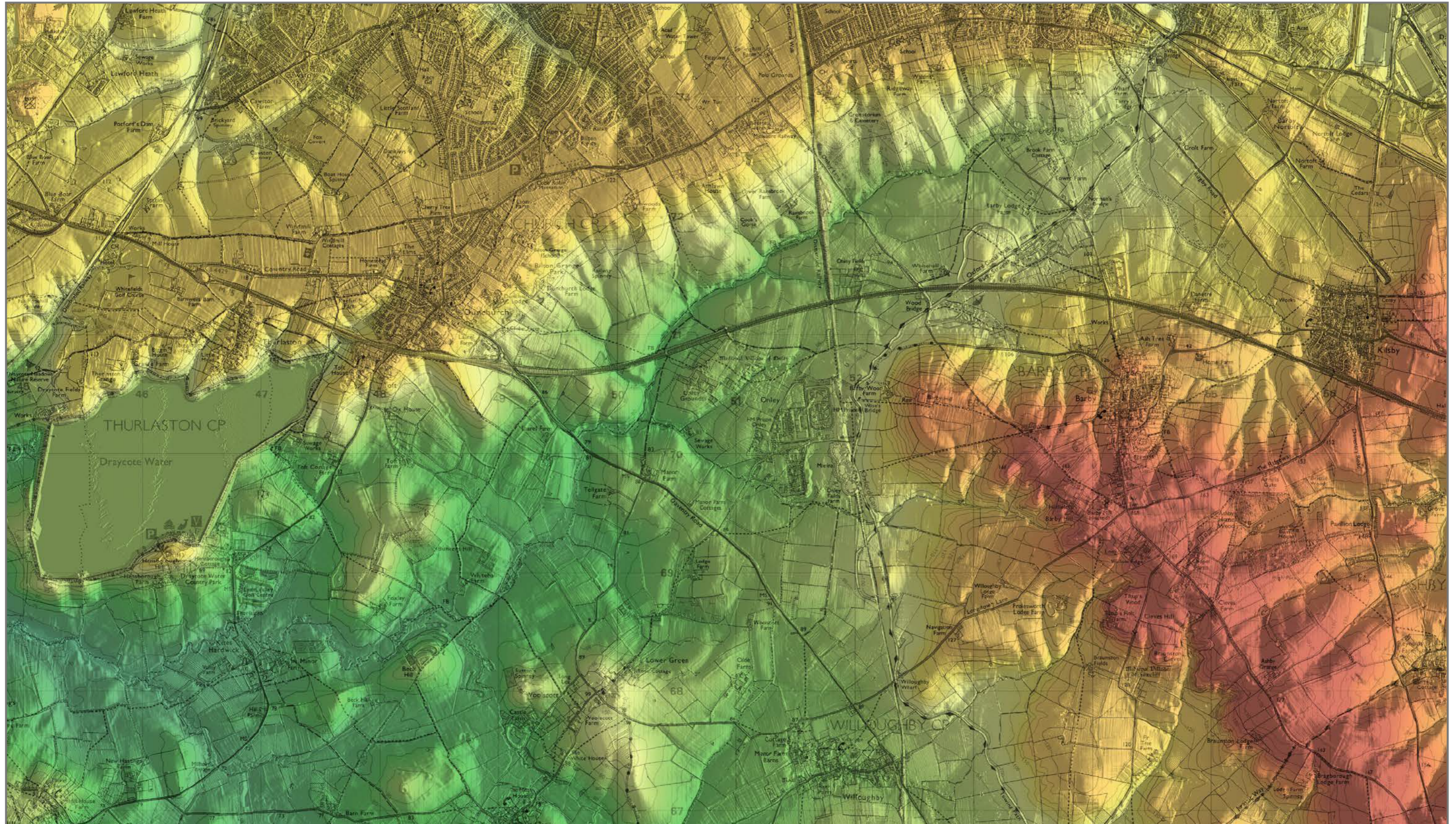
7 PLANS

PLAN 1: TOPOGRAPHY AND LANDFORM

PLAN 2: RAINSBROOK VALLEY LANDSCAPE SENSITIVITY ASSESSMENT, 2025 – ASSESSMENT AREA

PLAN 3: RAINSBROOK VALLEY EXTENTS

PLAN 4: COMBINED ASSESSMENT AREAS



Legend

Scale



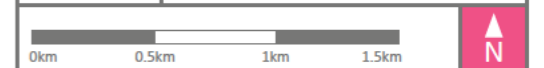
50 m

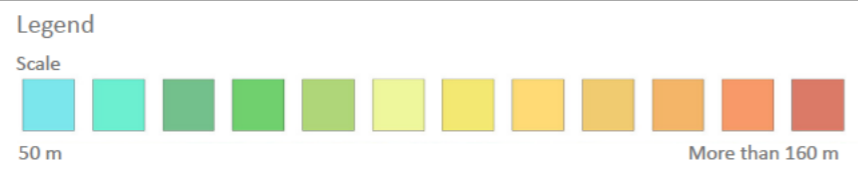
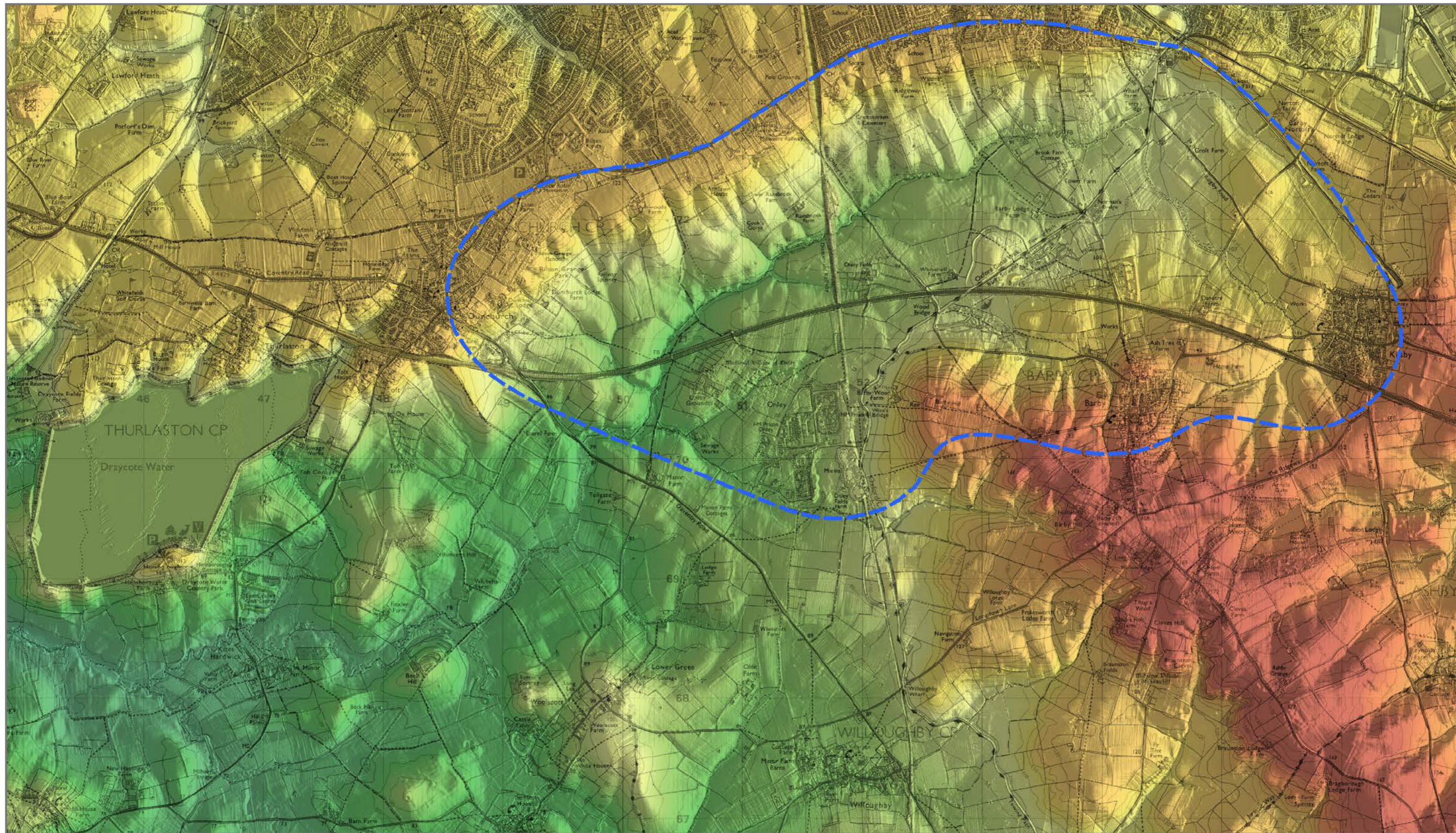
More than 160 m

Source: This topography plan has been modelled using GIS computer software (QGIS) and 2020 Composite LIDAR DTM supplied by DEFRA

Plan 1: Topography and Landform

Drawing Ref	Incola 1144 P1
Revision	-
Date	06/03/2026





Source: This topography plan has been modelled using GIS computer software (QGIS) and 2020 Composite LIDAR DTM supplied by DEFRA

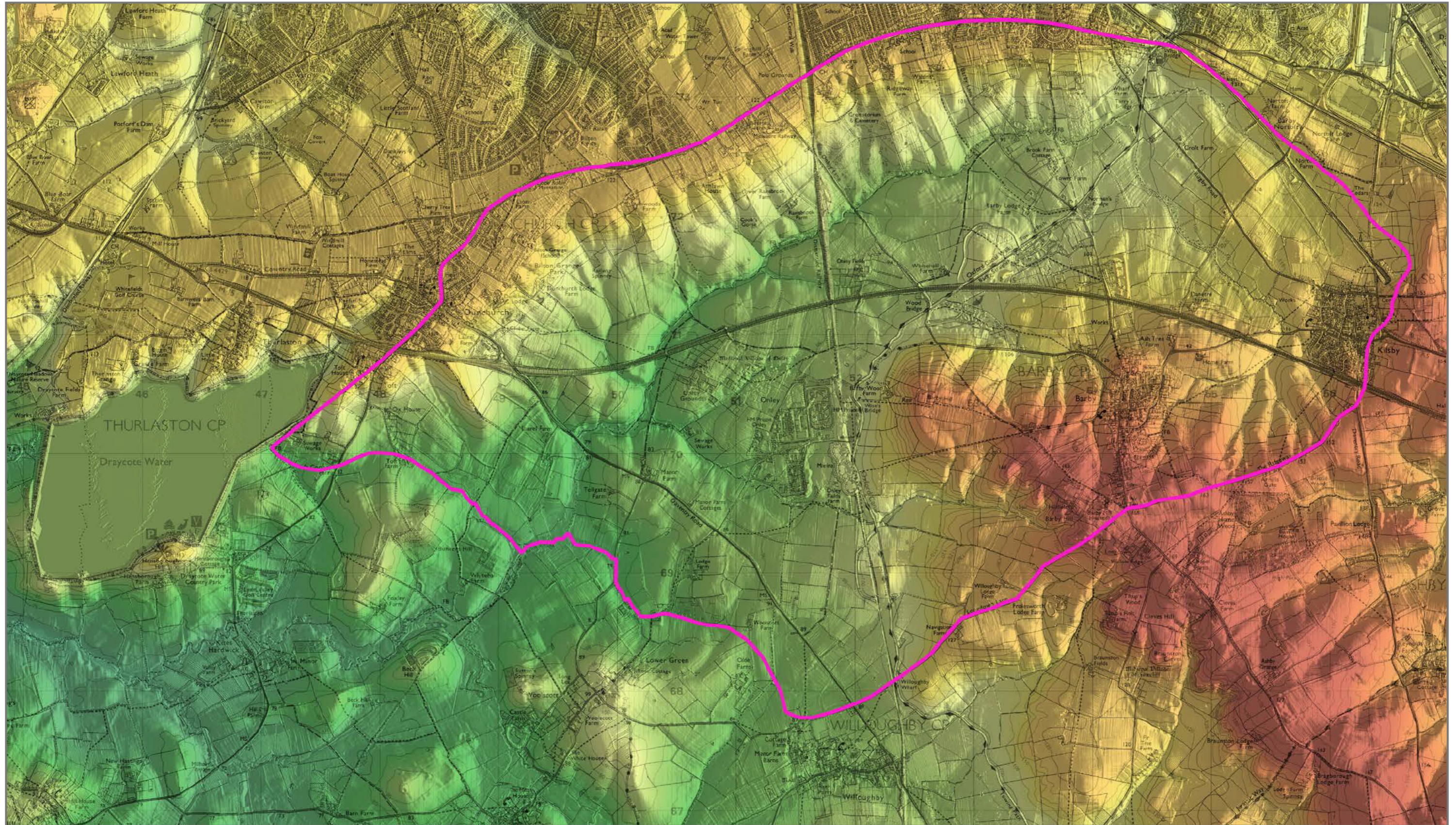
Rainsbrook Valley Landscape Sensitivity Assessment 2025 - Assessment Area Extents



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Plan 2: Rainsbrook Valley Landscape Sensitivity Assessment, 2025 – Assessment Area	
Drawing Ref	Incola 1144 P2
Revision	-
Date	06/03/2026

Rainsbrook Valley
Landscape Sensitivity Assessment Review
Incola 1144/R01
06/03/2026



Legend

Scale



50 m

More than 160 m

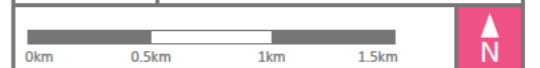
Source: This topography plan has been modelled using GIS computer software (QGIS) and 2020 Composite LIDAR DTM supplied by DEFRA

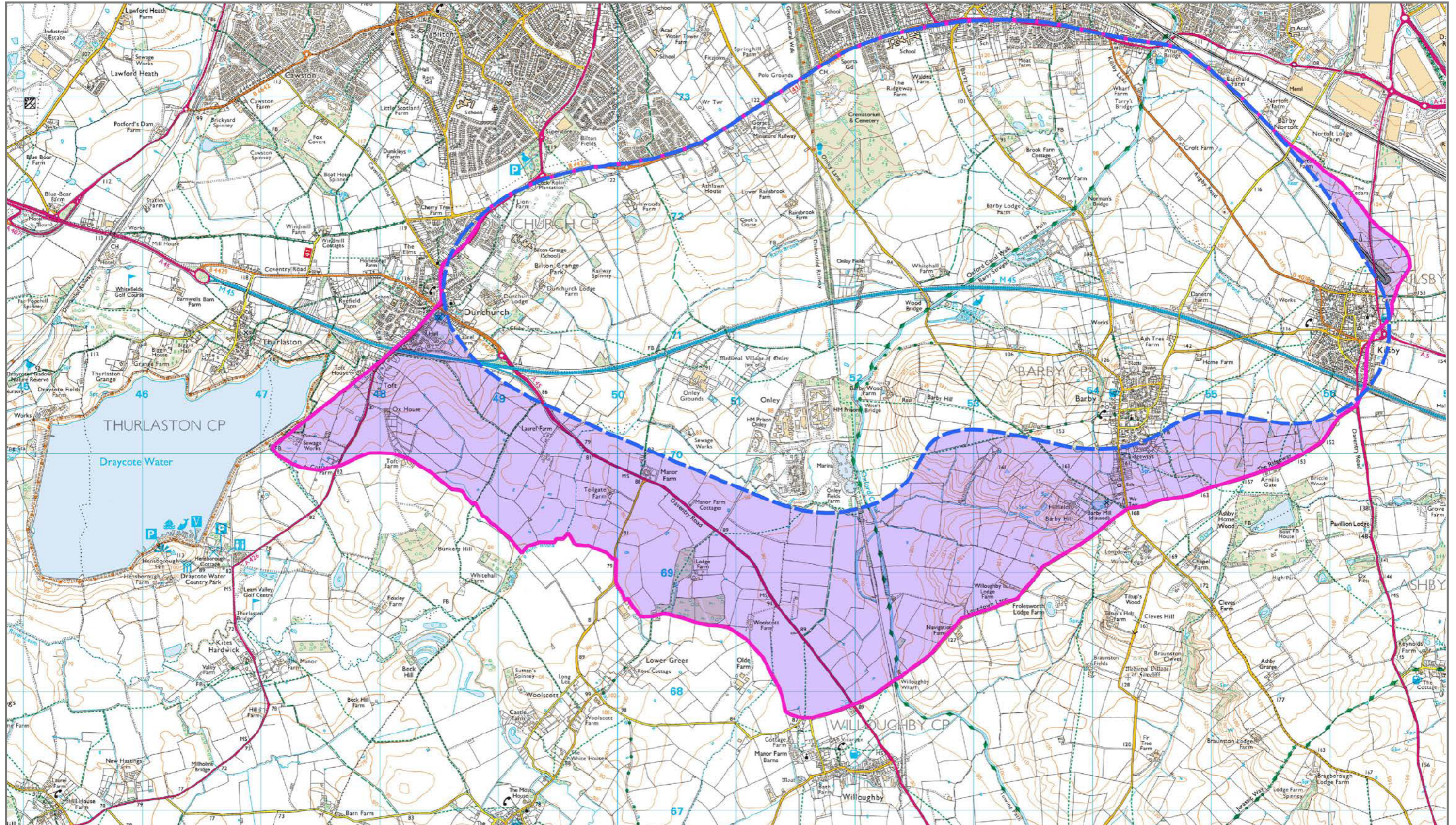


Rainsbrook Valley Extents

Plan 3: Rainsbrook Valley Extents

Drawing Ref	Incola 1144 P3
Revision	-
Date	06/03/2026





Legend

- Rainsbrook Valley Extents
- Rainsbrook Valley Landscape Sensitivity Assessment 2025 - Assessment Area Extents
- Additional Area

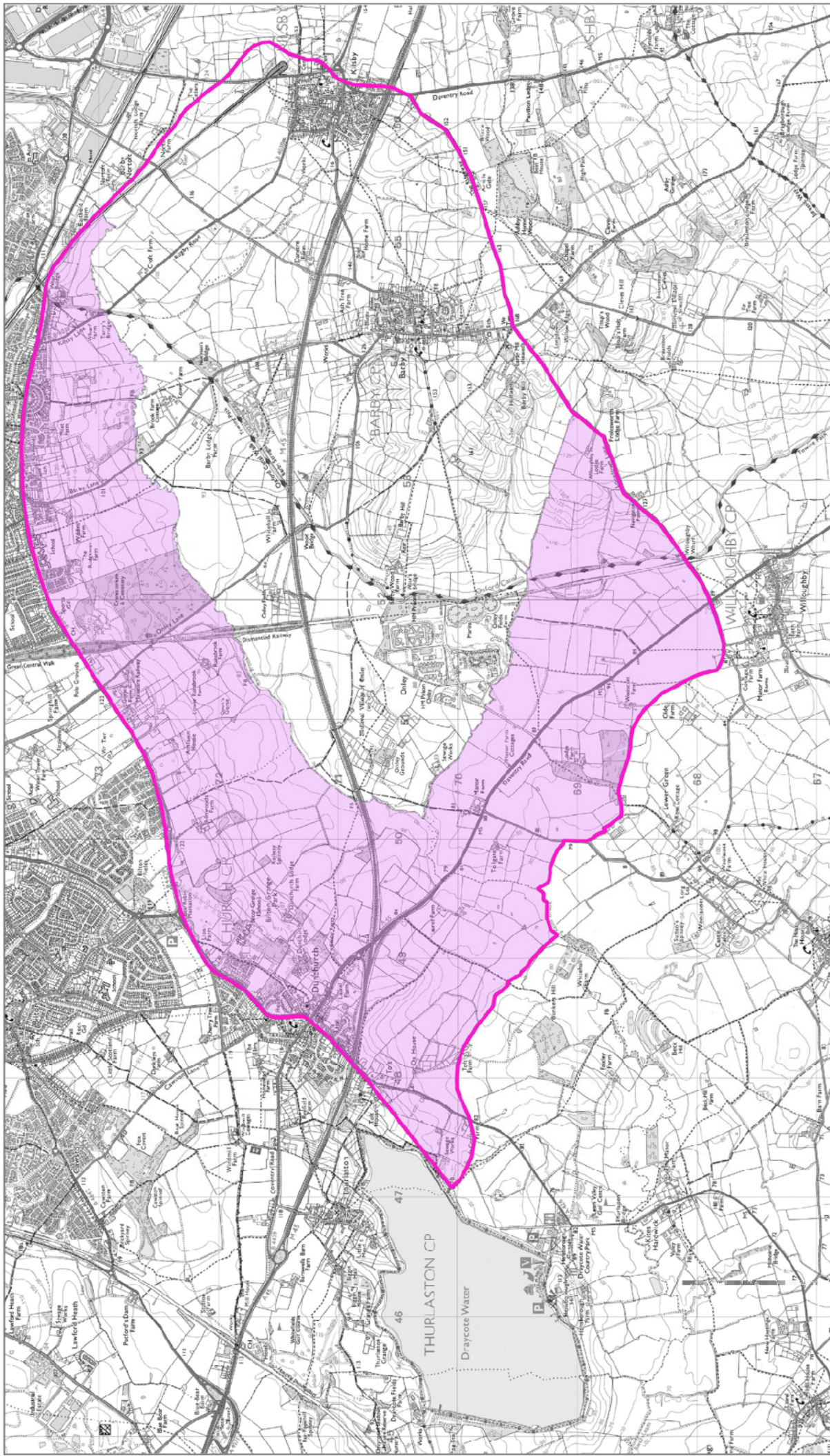
Plan 4: Combined Assessment Areas

Drawing Ref	Incola 1144 P4
Revision	-
Date	06/03/2026

Rainsbrook Valley
Landscape Sensitivity Assessment Review
Incola 1144/R01
06/03/2026

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APPENDIX 3 – PROPOSED POLICY EN3 DESIGNATION PLAN



The Rainsbrook Valley within Rugby Borough

Drawing Ref	Incola 1144 PI
Revision	-
Date	06/03/2026

0m 0.5km 1km 1.5km

Rainsbrook Valley
Landscape Sensitivity Assessment Review

Incola 1144/RO1
06/03/2026

Legend

- Rainsbrook Valley
- Rainsbrook Valley within Rugby Borough

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