

[REDACTED]

From: Rebecca Neely [REDACTED]
Sent: 13 March 2026 16:33
To: Local Plan
Subject: Proposed Submission Consultation
Attachments: 03.13.RN.WA5380(1)PS. Barby Lane - Rugby Local Plan Reg.19 Response - Final.pdf; Appendix 5 - Land East of Barby Lane Hillmorton - Landscape Sensitivity Assessment (RPS 2026).pdf; Representations Form - Policy EN3 - DLP Barby Lane.pdf; Representations Form - Policy H1 - DLP Barby Lane.pdf; Representations Form - Policy H2 - DLP Barby Lane.pdf; Representations Form - Policy H7 - DLP Barby Lane.pdf; Representations Form - Policy I4 - DLP Barby Lane.pdf; Representations Form - Policy I5 - DLP Barby Lane.pdf; Representations Form - Policy S1 - DLP Barby Lane.pdf; Representations Form - Policy S2 - DLP Barby Lane.pdf; Representations Form - Policy S6 - DLP Barby Lane.pdf; Representations Form - Site Selection and SA - DLP Barby Lane.pdf

Categories: Hayley dealing with

Dear Sir/Madam,

Please find attached our response to the Regulation 19 Consultation on the Proposed Submission Local Plan, submitted on behalf of Persimmon Homes (Central).

I would be grateful if you could confirm receipt of this submission at your earliest convenience.

Thanks,

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**Research
& Analysis**

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[REDACTED]

From: Jon Goodall [REDACTED]
Sent: 13 March 2026 16:56
To: Local Plan
Subject: Proposed Submission Consultation Site ID: 334 DLP Planning Ltd obo Persimmon Homes
Attachments: 03.13.RN.WA5380(1)PS. Barby Lane - Rugby Local Plan Reg.19 Response - Final.pdf; Appendix 5 - Land East of Barby Lane Hillmorton - Landscape Sensitivity Assessment (RPS 2026).pdf; Representations Form - Policy EN3 - DLP Barby Lane.pdf; Representations Form - Policy H1 - DLP Barby Lane.pdf; Representations Form - Policy H2 - DLP Barby Lane.pdf; Representations Form - Policy H7 - DLP Barby Lane.pdf; Representations Form - Policy I4 - DLP Barby Lane.pdf; Representations Form - Policy I5 - DLP Barby Lane.pdf; Representations Form - Policy S1 - DLP Barby Lane.pdf; Representations Form - Policy S2 - DLP Barby Lane.pdf; Representations Form - Policy S6 - DLP Barby Lane.pdf; Representations Form - Site Selection and SA - DLP Barby Lane.pdf

Categories: Hayley dealing with

Dear Sir or Madam,

Per the email below the attached files in response to the Regulation 19 Local Plan consultation were submitted at 16:33 by my colleague on behalf of Persimmon Homes. The contents are identical.

While we have had a 'delivery relayed' message from the Exchange server we have not received an automated response from your inbox but consider this may be because we have received automated responses having already made submissions for different interests from the same email address.

I am therefore submitting again from my address to generate a second delivery receipt and hopefully automated response to provide to our client.

I would be grateful for direct confirmation of receipt in due course and confirmation that having received duplicate copies of the submissions only one version needs to be registered as duly made.

Best Wishes,

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From: Rebecca Neely
Sent: 13 March 2026 16:33
To: [REDACTED]
Subject: Proposed Submission Consultation

Dear Sir/Madam,

Please find attached our response to the Regulation 19 Consultation on the Proposed Submission Local Plan, submitted on behalf of Persimmon Homes (Central).

I would be grateful if you could confirm receipt of this submission at your earliest convenience.

Thanks,

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For and on behalf of
Persimmon Homes (Central)

**Rugby Local Plan Review
Response to Regulation 19 Consultation**

Land east of Barby Lane, Rugby

**Prepared by
DLP Planning Ltd
Research and Analysis
Sheffield**



March 2026

Established in 1991

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Checked by:	Jon Goodall MA (Cantab) MSc MRTPI Director		
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APPENDICES

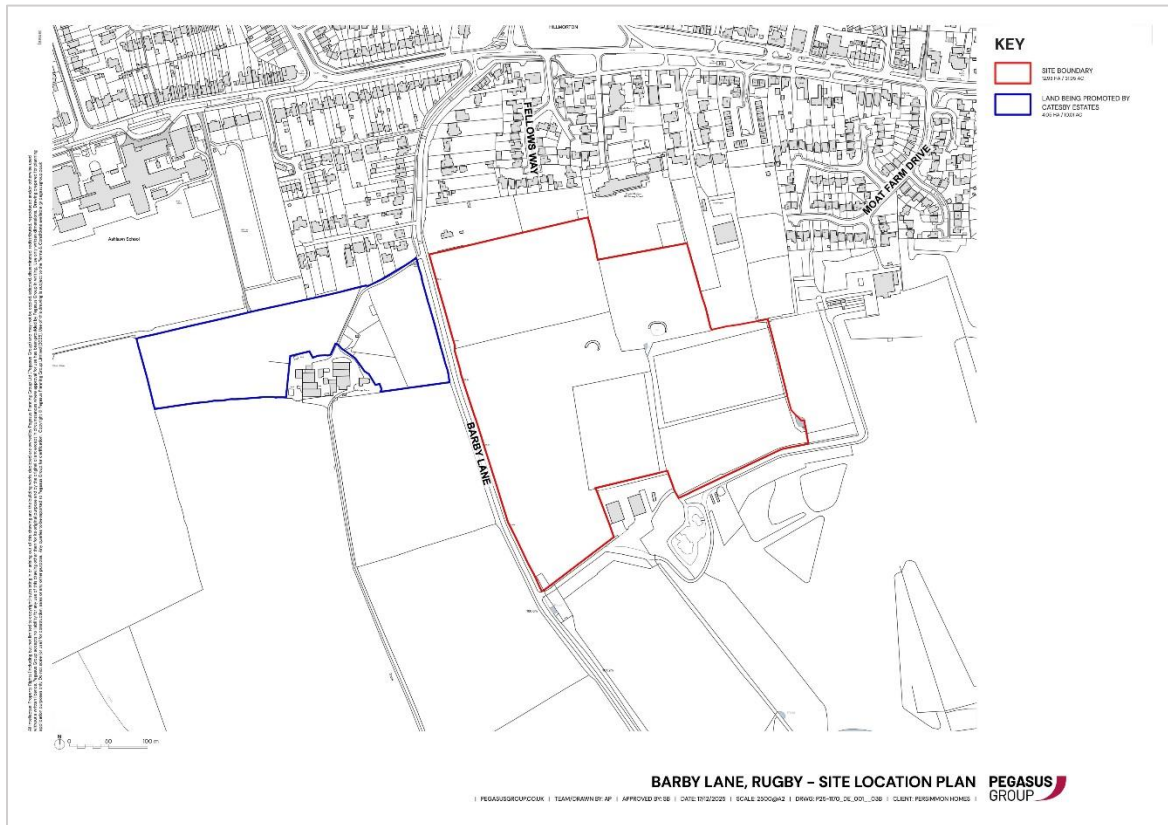
- Appendix 1 Site Location Plan**
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- Appendix 3 Development Framework Plan Option 2**
- Appendix 4 Whole Plan Trajectory and Land Supply Scenarios**
- Appendix 5 Land East of Barby Lane, Hillmorton – Landscape Sensitivity Assessment (RPS, 2026) (attached separately)**

1.0 INTRODUCTION

- 1.1 Rugby Borough Council is currently undertaking a Regulation 19 Consultation on the draft Local Plan, which commenced on 30th January and will run until 5pm 13th March 2026.
- 1.2 These representations have been prepared by DLP Planning Ltd on behalf of Persimmon Homes in response to Rugby Borough Council's Local Plan Review – Regulation 19 Consultation. The representations relate to Land east of Barby Lane site as outlined below and in **Appendix 1**.
- 1.3 DLP Planning has previously promoted the Barby Lane site through the Call for Sites and both the Issues and Options and Preferred Options stages of the Regulation 18 Consultation. The site was a draft allocation at the Regulation 18 stage, however the decision made by the Council was not to allocate the land at the Regulation 19 stage.
- 1.4 These representations have been prepared in the context that the Council has amended its approach and conclusions on assessment of the site following consultation on the Regulation 18 Preferred Options draft Plan. The Council no longer supports the conclusions on a contribution of 380 dwellings identified previously. It has stated that an alternative quantum of development has been assumed in its assessment. Critically, the Council has provided no clear indication of the site boundaries upon which any alternative assessment has been considered. It has not provided any justification for any resulting alternative capacity assumptions (the figure indicated by the Council being 150 dwellings).
- 1.5 The fundamental position within these representations is that having entertained, but then not fully set out its reasoning or conclusions on an alternative basis for assessing the site, its approach to site selection and rejection of the site from proposed allocations is unsound.
- 1.6 The Location Plan for the site has also been updated to reflect the current layout and recent development of additional agricultural buildings and hardstanding, together with tree planting. This illustrates the site's current relationship with and introduction of built development within the wider landscape.
- 1.7 The representations illustrate two appropriate options exist to make effective use of land and to address considerations associated with the site's assessment and selection for growth. These are as follows:
 - P25-1170_DE_002_01F Development Framework Plan – **Illustrating around 220 Units** comprising minor amendments to the allocation boundary identified in the previous consultation and reflecting an appropriate quantum and density of development in respect of relevant land use considerations
 - P25-1170_DE_002_01E Development Framework Plan - **170 Units** comprising an amended site boundary focused upon the westernmost parts of the site adjacent to Barby Lane and retaining key components of the wider Development Framework Plan relating to these areas in respect of structural planting, landscape buffers, open space and development layout
- 1.8 Both Development Framework Plan Options include land within the ownership of the BIRMINGHAM ROMAN CATHOLIC DIOCESAN TRUSTEES. The inclusion of this land in both Options is supported and reflects engagement with the agents (Savills) acting on their behalf. In both Options the land provides for the expansion of the English Martyrs Primary School (if required) together with open space including potential biodiversity enhancement and a Community Orchard. For the avoidance of doubt this means that the Council should

regard these benefits of the site as achievable as part of any Option assessed.

Figure 1: Site Location Plan (Land east of Barby Lane in red)



Source: Pegasus

- 1.9 These representations are accompanied by the **Land East of Barby Lane, Hillmorton – Landscape Sensitivity Assessment** (RPS, 2026) included as **Appendix 5** (and supporting files)
- 1.10 The RPS Assessment also considers the two Development Framework Plan Options contained within these representations (Figures 3 and 4 in the RPS Report). It reflects that these illustrate two potential options for the development of the Land within the Site and the encompassing landscape buffers, mitigation, screening and POS that could be incorporated.
- 1.11 The Barby Lane site is therefore suitable, available and achievable as a location to be allocated to contribute towards housing need and provide a range of other social, economic and environmental benefits.
- 1.12 As per the requirements of the National Planning Policy Framework (NPPF) 2024, these representations address the issue of whether the Draft Local Plan and supporting evidence, including the Stage 2 Site Assessment (December 2025) are 'sound'. Where it is considered that the policies of the Regulation 19 Draft Plan are not sound, by failing to demonstrate one of the four 'tests of soundness' criteria, the reasons for this are explained.

2.0 NATIONAL POLICY CONTEXT

2.1 The National Planning Policy Framework (“the Framework”) sets out the Government’s planning policies for England and how these are expected to be applied.

2.2 Those policies that are relevant to the plan-making process and these representations in respect of the Rugby Regulation 19 Local Plan are summarised below.

a) Achieving Sustainable Development

2.3 Paragraph 7 of the NPPF outlines the overall purpose of the planning system as to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

2.4 A key element of the Framework is a presumption in favour of sustainable development, which should apply to both plan-making and decision-taking (Paragraph 11). For plan-making, this means:

- (a) *All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- (b) *Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - (i) *The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - (ii) *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

b) Plan-Making

2.5 Paragraphs 15 to 38 of the Framework relate specifically to ‘plan-making’.

2.6 Paragraph 15 states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

2.7 Paragraph 16 requires that plans are prepared with the objective of contributing to the achievement of sustainable development, and be prepared positively, in a way that is aspirational but deliverable. They should also be shaped by early, proportionate and effective engagement between plan-makers and communities. Policies should be written in a clear and unambiguous way and serve a clear purpose.

2.8 Paragraph 20 requires that strategic policies set out an overall strategy for the pattern, scale and design quality of places, making sufficient provision for homes; employment; retail; leisure; infrastructure; community facilities; and enhancement of the natural, built and historic

environment.

- 2.9 Paragraph 23 states that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.
- 2.10 Paragraphs 24 to 28 require local planning authorities to cooperate with one another, and with other relevant bodies, to address strategic matters and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. Statements of common ground should be prepared to document progress on addressing cross-boundary matters. On the matters which require collaboration, strategic policy-making authorities should make sure that their plan policies align as fully as possible with those of other bodies.
- 2.11 Paragraph 27 states that plans should ensure that a consistent approach is taken to planning the delivery of major infrastructure, such as major transport services/projects, utilities, waste, minerals, environmental improvement and resilience; and strategic health, education and other social infrastructure (such as hospitals, neighbourhood health facilities, universities, schools, major sports facilities and criminal justice accommodation).
- 2.12 Paragraph 32 requires that the preparation of policies be underpinned by relevant, up-to-date, adequate and proportionate evidence.
- 2.13 Paragraph 33 states that local plans should be informed throughout their preparation by a sustainability appraisal that meets legal requirements and demonstrates how the plan has addressed relevant economic, social and environmental objectives. Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).
- 2.14 Paragraph 35 states that Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.
- 2.15 Paragraph 36 is a key section on the examination of Local Plans. It outlines the legal and procedural requirements for which Local Plans have to have been prepared in accordance with to be 'sound'. Plans are 'sound' if they are:
- (a) *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
 - (b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
 - (c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
 - (d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.*

c) Planning for Housing

- 2.16 Paragraphs 61 to 84 relate specifically to ‘delivering a sufficient supply of homes’.
- 2.17 Paragraph 61 requires LPAs to ensure that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 2.18 Paragraph 62 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance.
- 2.19 Paragraph 69 requires policy-making authorities to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.
- 2.20 Paragraph 72 states that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
- (a) *Specific, deliverable sites for years one to five of the plan period; and*
 - (b) *Specific, deliverable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*
- 2.21 Paragraph 77 states that the supply of large numbers of new homes can be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (our emphasis). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:
- (a) *Consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains;*
 - (b) *Ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*
 - (c) *Set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;*
 - (d) *Make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and*
 - (e) *Consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.*

2.22 Paragraph 78 states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old. These representations identify that the submission version draft Plan is wholly deficient in respect of the presentation of a draft housing trajectory and the assumptions (or lack thereof) provided to justify this for CMK.

d) Protecting Green Belt Land

- 2.23 Paragraphs 142 to 160 of the NPPF relate specifically to the protection of Green Belt land.
- 2.24 Paragraph 145 states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans.
- 2.25 Paragraph 146 details the exceptional circumstances for which Green Belt boundaries could be altered for, which include instances where an authority cannot meet its identified need for homes, commercial or other development through other means.
- 2.26 Paragraph 147 states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies which will take into account the preceding paragraph and whether the strategy:
- (a) *Makes as much use as possible of suitable brownfield sites and underutilised land;*
 - (b) *Optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
 - (c) *Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*
- 2.27 Where it is necessary to release Green Belt land for development, Paragraph 148 states that plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary

3.0 SITE SELECTION AND SUSTAINABILITY APPRAISAL

3.1 The Council's process for site assessment and site selection is not justified and does not result in identification of an appropriate strategy. This is also underpinned by objections to the Sustainability Appraisal supporting the Plan. The starting point for these objections are fundamental concerns with the chronology of site assessment and explanation of changes from the Preferred Options draft Plan including deletion of proposed allocation of our client's site (Ref: 334).

3.2 Firstly, there are factual issues with the use of site references in the SA. Paragraphs 5.4.40 and Figure 4 refer to Site ID334 as a constant within Growth Scenarios, but this incorrectly appears to relate to a separate site at Brinklow.

3.3 Paragraph 5.4.19 of the Sustainability Appraisal states:

Finally, it should be noted that the capacity of Site 334 is now assumed to be 150 homes, rather than 380 homes as was the previous proposal at the Draft Plan stage (it is being promoted for 400 homes), in order to account for landscape sensitivity. It is not clear that the effect is to significantly reduce what the scheme can deliver beyond new homes; however, it is noted that at the Draft Plan stage a proposed requirement was: "Provision of land for expansion of English Martyrs Primary School (if required)."

3.4 There is no assessment of this revised assumed capacity in the Council's evidence base. The Council's Stage 2 Site Assessments contain a pre-existing assessment of wider parcel ID: 146 that already acknowledges that no separate assessment of ID: 334 is undertaken. This is consistent with the Council's SHLAA pro-formas. It follows that there is no assessment whatsoever of an allocation of reduced scale to substitute the details for ID: 334 in Policy S6 of the Regulation 18 draft Plan.

3.5 There is no justification for the Sustainability Appraisal to query the provision of land for expansion of English Martyrs Primary School without such an assessment. For the avoidance of doubt, as illustrated by the Framework Plan options at **Appendices 2 and 3**, this land would still be provided as part of a reduced site option. However, this is work that the Council was required to explore in setting out the site options to be subject to Sustainability Appraisal.

3.6 Notwithstanding the lack of assessment, the site remains a reasonable alternative in the SA. Table 5.2 confirms the Hillmorton sites (the actual Ref: 334 plus Site 40) are 'reasonable alternatives' but not in the Preferred Option. This means any combination of options that includes 1,533 or 2,733 homes has tested the Hillmorton sites. Despite this, there is no straightforward assessment of simply indicating the sustainably located Hillmorton sites as additional to the Preferred Option. This complicates the assessment, meaning that options including Hillmorton consistently indicate worse effect in many domains than the Preferred Option, but this is generally a result of the negative effects of deleting or adding other options.

3.7 There is no direct reassessment of the straightforward conclusions that informed selection of the Regulation 18 Preferred Option, including the Hillmorton sites included in the Reg18 draft Plan and summarised at paragraph 5.4.15 of the Interim SA:

5.4.15. Moving to the southeast edge of Rugby, there is broadly a strategic case for supporting growth in this area, given constraints affecting broadly the western part of Rugby's urban edge (as discussed below), and given proximity to Houlton, extensive employment land and anticipated Rugby Parkway station.

- 3.8 The obvious benefit of the Parkway Station is not assessed consistently in the Regulation 19 SA. At paragraph 5.4.22 this acknowledges that “*It is also important to note the context of nearby committed Rugby Parkway Station*” but there is no straightforward scenario to show the effects of increasing growth at this sustainable location.
- 3.9 This uncertainty affects the assessment of specific effects. For example, paragraph 6.2.4 considers alternatives at the South of Rugby to be limited in scale and to offer potential limits to the provision of community infrastructure. Footnote 26 reinforces that should Primary School expansion be required the English Martyrs School would be the location with potential capacity to expand. Had the Council’s updated assessment reflected the continued ability to provide land for such an expansion the potential negative effects for South Rugby growth scenarios would be materially reduced.
- 3.10 As set out in these representations the Plan will not meet affordable housing needs in full. This is acknowledged in paragraph 6.2.39 where it states the new proposed approach of directing additional growth to urban sites can be questioned in this regard. However, the Preferred Scenario 1, which provides a limited supply buffer and concentrates growth on strategic sites, is assessed as performing better than Scenario 2 which *adds* sites capable of meeting needs and providing affordable housing in a sustainable location at Hillmorton. There is no logic whatsoever as to why this scenario performs *worse* at meeting housing need where the only addition is these sites. These should be the first location sought to meet additional needs outside of the Green Belt and providing a readily deliverable opportunity.
- 3.11 In relation to the Transport objectives of the SA, the Regulation 18 SA acknowledged that growth South-east of Rugby supported positive outcomes under the Preferred Option:
- 6.2.13. With regards to Scenario 1 versus Scenario 2, on balance these two scenarios are judged to perform broadly on a par, given that: A) NW Rugby is associated with clear accessibility challenges, which could also translate into challenges in respect of achieving good bus connectivity; B) under Scenario 2 the assumption is that there would not be two modest urban extensions to Rugby (Sites 59 and 334) that are both reasonably well-located in terms of active and public transport (also see discussion above re Site 59); and C) whilst there is a case for lower growth at villages under Scenario 2, growth at villages has the benefit of leading to dispersed car trips (to a degree) and one of the villages in question (Long Lawford) benefits from reasonable or good accessibility in terms of active and public transport.*
- 3.12 Despite the sites being in the same location, benefitting from the same planned infrastructure, the Regulation 19 SA scores suggest that adding sites at Hillmorton would perform worse (for example Scenario 2 Table 6.1 and paragraph 6.2.51 addressing South Rugby, summarising the most modest changes to scenarios inclusive of these sites) than the Preferred Option. This makes no reference to the Parkway Station and fails to justify the change from the previous assessment conclusion.
- 3.13 The nature of the proposed changes to the strategy, to both reduce the requirement, provision and buffer is that in totality each of the components of the strategy is of relatively greater importance to ensuring it is achieved. In other words, the risks arising from non-delivery of any one component are greater. To illustrate, urban capacity at 703 units would, if concluded to be undeliverable/undevelopable, result in an overall buffer of just 2%. Further risks to delivery at South West Rugby and Houlton should be viewed in the same light.

4.0 POLICY S1 – SETTLEMENT HIERARCHY

- 4.1 Policy S1 sets out the settlement hierarchy of the Borough, stating that Rugby town will be the main focus for new homes and employment, referring to the Policy Map for the settlement boundary. The Policy Map shows the Barby Lane site as just outside of, but adjacent, to the settlement boundary.
- 4.2 However, the policy does not adhere to the principles of sustainable development as set out in the NPPF, as it does not provide any flexibility for sites on the edge of the settlement boundary. Furthermore, the policy appears to lend greater support to significant expansion of rural settlements as opposed to smaller extensions of the settlement boundary of the largest town which is outlined within the policy to be ‘the main focus for new homes and employment’.
- 4.3 Policy S1 references how only limited development will be permitted at other rural settlements including Ansty. Despite this position, the Plan proposes a substantial employment allocation in this rural location. Crowner Fields Farm and Home Farm is a 112.2 ha site allocated for employment use. This scale is clearly strategic in nature and materially exceeds what would ordinarily be described as ‘limited’. The policy supporting text acknowledges that the plan’s strategy includes significant planned expansion at some main rural settlements.
- 4.4 The policy is therefore contradictory in stating that rural settlements such as Ansty will only support limited development. Additionally, it is contradictory to state that Rugby town will be the main focus for new homes and employment, whilst a significant proportion of development is being directed towards rural settlements.
- 4.5 In spatial terms, sites adjacent to the Rugby town settlement boundary represent a more logical and sustainable location for growth than rural settlements. The submission draft Plan acknowledges that proposals for Rugby Parkway Station are substantially more advanced (paragraph 9.17). The Parkway Station provides further enhancement of public transport links, not just for the town itself, but also reinforcing the sustainability of strategically significant employment links at Daventry International Rail Freight Terminal, which are easily accessible from the south of Rugby. The settlement hierarchy prioritises significant planned expansion at other settlements ahead of these clear opportunities to align strategic priorities for sustainable development at the principal settlement of Rugby.
- 4.6 Paragraph 77 of the NPPF2024 does not prescribe precise definitions to large scale development in different contexts, such as at the edge of towns with the same characteristics of Rugby. Criterion (a) of paragraph 77 relating to considering opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains must be applied in context. The Plan’s proposed settlement hierarchy clearly demonstrates that it is inconsistent with national policy in failing to support the distribution of growth in accordance with these objective.
- 4.7 The current approach to the settlement hierarchy and the policy wording therefore results in tension within the spatial strategy. Significant development proposed in a rural location is identified as a restraint, whilst sustainable edge-of-settlement opportunities in Rugby town are not afforded equivalent or greater support. Therefore, the plan does not adhere to the principles of sustainable development as set out in the NPPF and is not consistent with national policy. The Plan is not justified as the settlement hierarchy is not consistently adhered to and the spatial strategy is not appropriate. The Plan is unsound in its current form in line with Paragraph 36 of the NPPF.



adhered to and the spatial strategy is not appropriate. The Plan is unsound in its current form in line with Paragraph 36 of the NPPF.

- 4.8 For the plan to be justified and compliant with national policy, a consistent application of the spatial strategy is required. Greater flexibility should be afforded to sustainable sites adjoining the Rugby town settlement boundary, in preference to or at least consistent with the significant amount of flexibility that has been afforded to rural settlements.

5.0 POLICY S2 – STRATEGY FOR HOMES AND PLAN PERIOD

a) Housing Trajectory, Land Supply and Plan Period Provision

- 5.1 Policy S2 states that 10,812 new homes will be delivered in the period 2025-2042 (636 each year) to meet future housing need. The largest supply of homes is identified at the South West Rugby site (3,505) followed by the deliverable units at Houlton by 2042 (2,060). There are an additional 2,886 units from allocations under Policy 6. The table within the policy sums the total number of homes to be delivered as 11,729, indicating (in the Council's view) an 8.5% surplus against the housing requirement set in accordance with LHN.
- 5.2 In comparison, the Regulation 18 draft Plan proposed to allocate around 3,338 additional homes, with a total number of 14,134 units identified for delivery for a lengthier 2024-2045 Plan Period (LHN = 618dpa). The table below summarises the changes in Policy 2 between the Regulation 18 and 19 draft Plans.

Table 1: Changes Between Reg 18 and Reg 19 Plans

	Number of Homes Allocated	Total Units Identified	LHN Requirement	Surplus Against LHN
Reg 18 Draft	3,338	14,134	12,978	9%
Reg 19 Draft	2,886	11,729	10,812	8.5%

Source: Regulation 18 and 19 Draft Plans

- 5.3 Though the LHN requirement has decreased by 2,166 between drafts (principally due to the reduced Plan Period), the total units identified has fallen by a greater margin of 2,405.
- 5.4 For the avoidance of doubt, our clients also object to the foreshortened plan period to 2042. Unless the Plan is adopted before 31 March 2027, which appears unlikely given requirements for Examination, it will not provide for a minimum 15 years from adoption. Even making provision for one further years' requirement, which need not be backloaded at the end of the Plan Period, would increase flexibility ad choice and address the issues with site selection and the settlement hierarchy detailed in these representations.
- 5.5 The number of allocated sites under Policy S6 has fallen by 452, which includes the removal of the Barby Lane allocation (380 units). This has resulted in the surplus against the LHN also decreasing from 9% to 8.5%. In terms of the number of dwellings and buffer to ensure deliverability, the Regulation 18 draft of the plan was more positively prepared than the Regulation 19 draft.
- 5.6 The revised position in relation to our client's site is part of wider changes to the strategy for housing that will result in barriers to addressing the housing requirement. While the difference between 2,886 and 3,338 units (c.450 units) seems more limited, the submission version Plan also includes an increased allowance for allocations on urban capacity sites within the 2,886 units. The removal of the Barby Lane site at Hillmorton is therefore in the context of a substantial number of deletions and substitutions of proposed allocations on greenfield (and Green Belt and/or Grey Belt land) representing total changes of at least -1,000 net dwellings.
- 5.7 Our client's site is distinct from the vast majority of other changes from the Regulation 18 Plan due to the myriad of soundness issues its deletion generates. This becomes a function of the Council prioritising the release of Green Belt land ahead of sustainable non-Green Belt

options (contrary to NPPF2024 paragraph 148); failing to reflect planning investment at the borough's most sustainable centre (contrary to NPPF2024 paragraphs 20 and 77); and compounds issues for the Council in providing for housing needs in full and addressing the challenges to delivery that have underpinned previous Plans and continue to beset identified strategic locations for growth (contrary to NPPF2024 paragraphs 23, 61 and 72).

- 5.8 Our analysis of the Whole Plan Trajectory (Detailed) (December 2025) indicates that the supply identified by the Council is not sufficient in meeting the LHN requirement. Several of the sites, particularly the South West Rugby and Houlton sites, remain in the outline stage. A significant total of 6,147 units of supply, or 52.4% of identified supply, do not have full planning permission and are consequently subject to a degree of delivery risk, undermining reliance on them to meet the LHN requirement. These sites either have no submitted application, are awaiting a decision on an outline application, or have outline permission with no full permission currently granted.
- 5.9 Paragraph 72 of the NPPF states that there is a requirement for planning policies to identify a supply of specific, deliverable sites for five years following the intended date of adoption. As discussed above, several of the South West Rugby and Houlton sites should be removed from the five-year supply due to no detailed planning permission being in place (in line with the Annex 2 definition of deliverable).
- 5.10 While it will not reflect the position at adoption it is important to set the Council's approach to supply in context at the start of the trajectory. It is also important to note that according to Government Live Table statistics (Table 123), 671 net additions were achieved in 2024/25 and 866 in 2023/24. By the Council's own admission, these more successful elements of previous strategies comprising completions and extensions to the urban edge will be exhausted before the start of the new Plan Period. The Council is seeking to minimise the flexibility in supply and rely on Urban Capacity Study allocations with uncertain timeframes at precisely the point the delivery challenges with the largest strategic sources of supply becoming paramount.
- 5.11 If the five-year supply identified by the Council at 1 April 2025 is considered without change, i.e. allowing the South West Rugby and Houlton sites to remain, the Council cannot demonstrate a five-year supply at 1 April 2025. This is summarised in the table below.

Table 2: Five-Year Housing Land Supply (using unchanged Council data) (1 April 2025)

A	Standard Method Requirement	636
B	5 Year Target	3,180
C	Requirement plus 5% Buffer (B*1.05)	3,339
D	5 Year Annualised Requirement with Buffer (B+C)	668
E	Supply	2,987
F	5YHLS (E/D)	4.47

Source: DLP Analysis of Whole Plan Trajectory (Detailed)

- 5.12 This 4.47 five-year supply further demonstrates that the Plan is not positively prepared and is not consistent with national policy. The issues with delivery of the current strategic locations for growth should have informed selection of an appropriate strategy including

increasing the choice and mix of sites to address risks for non-delivery (consistent with NPPG: 68-031-20190722).

- 5.13 The majority of the South West Rugby supply is awaiting approval of outline applications, with pending applications from as long ago as 2019 with no made decision. Additionally, three of the largest parcels of the site totalling 2,870 units had applications submitted recently (May to June 2025).
- 5.14 Given these lengthy delays and recent application submissions, there is no clear evidence presented to demonstrate the deliverability of supply at 1 April 2025.
- 5.15 Regarding Houlton, Key Phase Four is awaiting determination of Reserved Matters whilst 3,873 units ('Remainder of Houlton Allocation') only have outline planning permission. There is a lack of clear evidence to include these within the five-year housing land supply period. The Council's position is that Houlton will not continue to build out at rates observed in the early years of delivery, and this is consistent with the absence of clear evidence for future deliverable parcels. The site is assumed to have delivered first completions in 2017/18, with approximately 1,900 completions to date. This indicates an annual average of c.235dpa. This has fallen recently, with only 148 completions forecast in 2024/25. From 2032-2042 the developers' trajectory falls to around 155dpa, which is broadly consistent with the national average for a site of this size.
- 5.16 From 2027-2032 the trajectory retains an average build rate of 237dpa, despite not detailed planning permissions currently existing and being forecast to deliver new phases in this period. The trajectory does not provide clear evidence for how this will be sustained.
- 5.17 For the purposes of NPPF2024 paragraph 72, the Examination is likely to consider the assessment of deliverable supply at adoption and utilising a base-date of 1 April 2027. The Council will be required to demonstrate the deliverability of forecast supply in 2030/31 and 2031/32 falling outside the current five-year period.
- 5.18 While it is acknowledged that Houlton and South West Rugby have a realistic prospect of a delivery profile including additional parcels from 2030 onwards (not presently part of the five year period) there is no clear evidence for the cumulative delivery of 5,074 units forecast by the Council for 2025-2032. This total also includes 897 units forecast for delivery from proposed new allocations, most of which comprise challenging urban capacity sites (noting for example that large scale Green Belt release at Long Lawford is not forecast until beyond 2031/32).
- 5.19 Soundness issues with the cumulative delivery relied upon are emphasised by the shortfall that the Council will be required to address in the assessment of supply upon adoption. Even under the Council's case this equates to -283 units (989 forecast units versus 1,272 units' cumulative requirement. It is reasonable to consider that the position may be worse than this given current constraints on delivery and the number of active parcels. Live Table 253a quarterly indicators of new supply statistics show only 190 new dwellings completed between April and September 2025 compared to 350 for the same 6 month period in 2024. Given 671 net overall additions were recorded in 2024/25 and the Council forecasts a total of 567 in 2025/26 the greater magnitude of difference in quarterly outputs suggests barriers to delivery of the Council's forecast total.
- 5.20 Using the Council's own evidence, accounting for shortfall from 1 April 2025, the land supply at 1 April 2027 would show 5.62 years or a 449 unit surplus.

Table 3: Five-Year Housing Land Supply (using unchanged Council data) (1 April 2027)

A	Requirement 2025-2027	1272
B	Forecast delivery 2025-2027	989
C	Shortfall / Surplus	-283
D	Standard Method Requirement	636
E	Basic 5 Year Requirement	3180
F	Plus shortfall (E + C)	3463
G	Requirement (inc shortfall) plus 5% Buffer (F * 1.05)	3636
H	5 Year Annualised Requirement with Buffer	727
I	Supply	4085
J	5YHLS (I / H)	5.62

Source: DLP Analysis of Whole Plan Trajectory (Detailed)

- 5.21 For the reasons outlined above this is extremely modest and not supported by clear evidence of deliverability for the supply relied upon. It includes, for example, 200 units' forecast supply at Rugby Shopping Centre (Site Ref: ID283) where the Urban Capacity Study acknowledges Phase 1 Planning Permission for 210 flats may be subject to change. Development, following clearance and demolition, must commence by 2027. The submission version Plan refers to an emerging Supplementary Planning Document (paragraph 4.2) that may be affected by changes to plan-making legislation.
- 5.22 This period also includes unprecedented forecast delivery in excess of 250dpa at South West Rugby from 2030/31. There is no clear evidence that this site will out-perform past completions at Houlton.
- 5.23 There are numerous other issues with the Council's housing trajectory. For example, the detailed Whole Plan Trajectory includes land at the Former Newton Vehicle Rentals Site, 117 Newbold Road that the Council does not regard as deliverable at 1 April 2025 (122 units). The Council notes that the site is currently for sale, indicating clear evidence that completions will not begin within 5 years, and the SHLAA records that the site is not built out. However, for the purposes of the Whole Plan Trajectory any such constraints are considered to be overcome with the site deliverable as of 1 April 2027. While we have not excluded this site, it is illustrative of the lack of consistency with national policy and guidance in the Council's forecasts.
- 5.24 It is therefore clear that significant additional evidence is required to demonstrate a five year supply upon adoption. In our assessment this will not indicate the ability to satisfy the five-year requirement, and to address shortfall, without additional sources of supply.
- 5.25 For the purposes of these representations, conclusions on deliverability at 1 April 2027 should be treated as without prejudice, and do not necessarily correspond to the position that should be applied at 1 April 2025 where clear evidence does not exist. However, the following realistic scenario, taking account of lead-in and build-out rates, reinforces a significant deficit at 1 April 2027:

- **South West Rugby** forecast to deliver at 150dpa 2028/29 to 2032/33. This is consistent with the Mean build-out rate for sites of this size from the Third Edition of Lichfields' Start to Finish Report. This is a difference of 621 units versus the LPA's forecast for the same five years, but still includes 215 units' forecast supply to 31 March 2030 for which there is currently no clear evidence (net of 85 units with detailed permission included in the Council's trajectory for 2028-2030) – *this site follows the LPA's trajectory from 2033 onwards, without prejudice*
- **Houlton** forecast to deliver at 188dpa 2026/27 to 2033/33. This is consistent with the Upper Quartile build-out rate for sites of this size from the Third Edition of Lichfields' Start to Finish Report (reflecting stronger past performance from the site). This is a difference of 226 units versus the LPA's forecast for the same seven years, but still includes 837 units' forecast supply to 31 March 2030 for which there is currently no clear evidence (noting only 84 units with detailed permissions remain included in the Council's trajectory for 2026-2030) – *this site follows the LPA's trajectory from 2033 onwards, without prejudice*
- **Proposed New Allocations** forecast to deliver 810 dwellings from 2028/29 to 2032/33 (162dpa) compared to 1,267 units forecast by the LPA (difference of -457 units). This reflects the lack of clear evidence provided by the LPA for submission dates, lead-in timeframes and build-out rates in the context of emerging allocations. This still assumes 270 completions before 31 March 2030 (90 dwellings 2028/29 and 180 dwellings 2029/30) despite the absence of clear evidence. This compares with the Council's total of 289 dwellings forecast in the five year period from 1 April 2025, of which only 99 units forecast supply at the Rugby Shopping Centre can be considered sites with permission (albeit not necessarily deliverable) – *this scenario nevertheless assumes full build out of 2,886 units on proposed new allocations by the end of the Plan Period in 2042*

5.26 Applying these assumptions to the 1 April 2025 and 1 April 2027 base-date calculations results in the following assessments of supply:

Table 4: Five-Year Housing Land Supply (DLP Scenario) (1 April 2025 / 1 April 2027)

		1 April 2025	1 April 2027
A	Requirement 2025-2027	N/A	1272
B	Forecast delivery 2025-2027	N/A	980
C	Shortfall / Surplus	N/A	-292
D	Standard Method Requirement	636	636
E	Basic 5 Year Requirement	3180	3180
F	Plus shortfall (E + C)	3180	3472
G	Requirement (inc shortfall) plus 5% Buffer (F * 1.05)	3339	3646
H	5 Year Annualised Requirement with Buffer	668	729
I	Supply	2687	3115
J	5YHLS (I / H)	4.02	4.27

Source: DLP Analysis of Whole Plan Trajectory (Detailed)

- 5.27 This analysis indicates a -531 unit deficit against the five-year requirement on adoption.
- 5.28 **Appendix 4** to these representations provides outputs for the Whole Plan Trajectory and Land Supply Scenarios consistent with these assumptions.
- 5.29 When these realistic lead-in times and delivery rates are applied, the total supply over the plan period reduces to 10,892 units. This should be regarded as an absolute maximum as it assumes applications will come forward on identified sites, and that outline applications will be permitted. It also considers only Part B sites and so does not reflect sites with full planning application which may be facing barriers against delivery.
- 5.30 This is a difference of at least 837 units against the Council's assumptions.
- 5.31 This 10,892-unit supply could meet the 10,812 LHN requirement but with only an 80 unit surplus. The Plan cannot be considered soundly based on these terms and lacks the necessary flexibility to respond to future change. The strategy for homes is neither positively prepared, justified or effective. It is not consistent with national policy as it cannot be demonstrated that the trajectory will meet or provide any buffer against LHN.
- 5.32 Our analysis of the trajectory in line with the NPPF Annex 2 definition of deliverable shows that the forecast shortfall against the LHN requirement on adoption (292 units) will have increased to a deficit of 531 units by five years following adoption (31 March 2032). Existing shortfall will not have been addressed. This is a serious soundness concern and suggests significant under delivery will occur in the first five years of the plan period from adoption – failing to accord with the aims of national policy to significantly boost supply.

b) The Proposed Housing Requirement and Relationship to the Standard Method

- 5.33 As part of the plan-making process it is necessary to consider whether the LHN requirement represents a sufficient number of homes to support projected future growth. The NPPF (Paragraph 62) and PPG¹ are clear in stating that the Standard Method calculates the minimum annual need to plan for.
- 5.34 Paragraph 1.6 of the Updated Housing Needs Evidence for Rugby Borough (September 2025) states that *“The standard method defines a housing need of 636 dpa for Rugby Borough. Over the 2025-43 plan period, the resultant 11,450 dwellings support population growth in the Borough of 17,800 (14.6%).”*
- 5.35 This evidence considers the period to 2043, presumably anticipating the requirement for a 15-year plan period on adoption. The reason for the inconsistency with the selected 2025-2042 plan period is not explained. It will reduce the level of population growth that can be supported. Though the Housing Evidence figures are based on a plan period of 2025-2043, the 11,450 dwelling requirement aligns closely with the 11,729 identified supply and so this would support a similar level of population growth.
- 5.36 The 2022 Sub-national Population Projections reveal that, between 2025 and 2043, the population of Rugby is expected to grow by 17.3%, resulting in a population growth of 21,092. This is significantly greater than the 17,800 figure which is supported through a provision of 11,450 dwellings.
- 5.37 This shows that the LHN requirement for the plan period and the identified supply are incapable of supporting projected population growth. Considering the adjustments to the

¹ Reference ID: 2a-002-20241212

supply which are calculated above, the projected growth would further exceed the population which could be accommodated in the planned number of homes due to the lack of choice and flexibility in supply. As a consequence, the housing requirement based solely on the LHN risks underestimating future needs. The Plan is therefore not positively prepared as it cannot respond to assessed future need. A higher housing requirement may therefore be justified to ensure that future growth is properly planned for and accommodated.

- 5.38 The Housing Needs Update evidence contains only one reference to the latest 2022-based subnational population projections at paragraph 4.24, associated with establishing a demographic model to align with local housing need. However, this then arrives at a lower overall projected population growth than quoted in paragraph 1.6. This appears to be because the projection of 17,800 people 2025-2043 ignores any improvement in household formation rates, which it is reasonable to assume are an objective of the Government's affordability adjustment in the standard method. Paragraph 4.24 therefore indicates planning for local housing need, with improvements in household formation, would support population growth of only 13,800 people 2025-2043 (see also Table 4.3):

In developing this projection, the population is projected to increase by 13,800 people over the 2025-43 period, with this increase being particularly strong in older age groups (47% of the growth is projected to be in age groups 65 and over, with this group increasing by 29%). There is projected to be a decrease in the number of children. The two tables below show projected changes by age -the first table shows broad age bands and the second is in 5-year bands.

- 5.39 No comparison with the official 2022-based subnational population projections is offered in the Housing Needs Update evidence. However, we have undertaken analysis of the 2022 SNPPs alongside Table 4.2 of the Updated Housing Needs Evidence. It should be noted that the age categories differ very slightly regarding the grouping of 15- and 16-year-olds, with the SNPP data grouping 15–64-year-olds and the Housing Needs Paper grouping 16–64-year-olds.

Table 5: Comparison of Table 4.2 of the Updated Housing Needs Paper and 2022 SNPPs (2025-2043)

	Change in Population		% Change in Population	
	Housing Paper	2022 SNPPs	Housing Paper	2022 SNPPs
Under 15 (SNPPs) / Under 16 (Council)	-1,744	259	-7.1%	1.2%
15-64 / 16-64	9,058	13,877	11.7%	17.9%
65 and over	6,444	6,962	29.1%	31.5%
Total	13,759	21,098	11.1%	17.3%

Source: 2022 SNPPs and Updated Housing Needs Evidence

- 5.40 The above analysis shows that over the same time period of 2025-2043, the Council significantly underestimates the number and percentage growth of the population at all levels. The SNPPs show a small positive growth in the number of children, and a slightly higher growth of older persons aged over 65. However, the most significant difference between the Council's evidence and the SNPPs comes in the projections for working age adults.
- 5.41 The Council underestimates the change in working age adults by 4,819 people which is a

highly significant difference in the projected population which needs to be supported in households. The Plan is therefore not positively prepared as it cannot respond to future population needs. It is not justified as the evidence is not supported by the official population projections.

- 5.42 To put the revised Standard Method into context for Coventry and Warwickshire, total local housing need exceeds the result of the former standard method. It also exceeds the alternative calculation of local housing need from the 2022 HEDNA. However, Rugby is a significant outlier in this respect. Only Rugby and, to a lesser extent, Coventry produce lower totals under the revised standard method. The Government's objectives for housebuilding necessitate a near-doubling of the starting point for need in Nuneaton and almost treble in North Warwickshire. This is summarised in Table 5 below:

Table 6: Standard Method Outputs in Coventry and Warwickshire

Standard Method	NPPF2018 SM	NPPF2018 LHN	Revised SM
	HEDNA2022	HEDNA2022 Revised Projections	Stock-Based
Rugby	516	735	636
Coventry	2362	1455	1393
North Warks	176	119	362
Nuneaton and Bedworth	435	409	756
Warwick	675	811	1085
Stratford-upon-Avon	564	868	1112
Total	4728	4397	5344

Source: HEDNA (2022) and MHCLG

- 5.43 In contrast the HEDNA's revised household projections have provided a stronger predictor of current levels of demand indicated by the latest subnational population and household projections for Rugby. This is summarised in Table 6 below:

Table 7: HEDNA Housing Projections

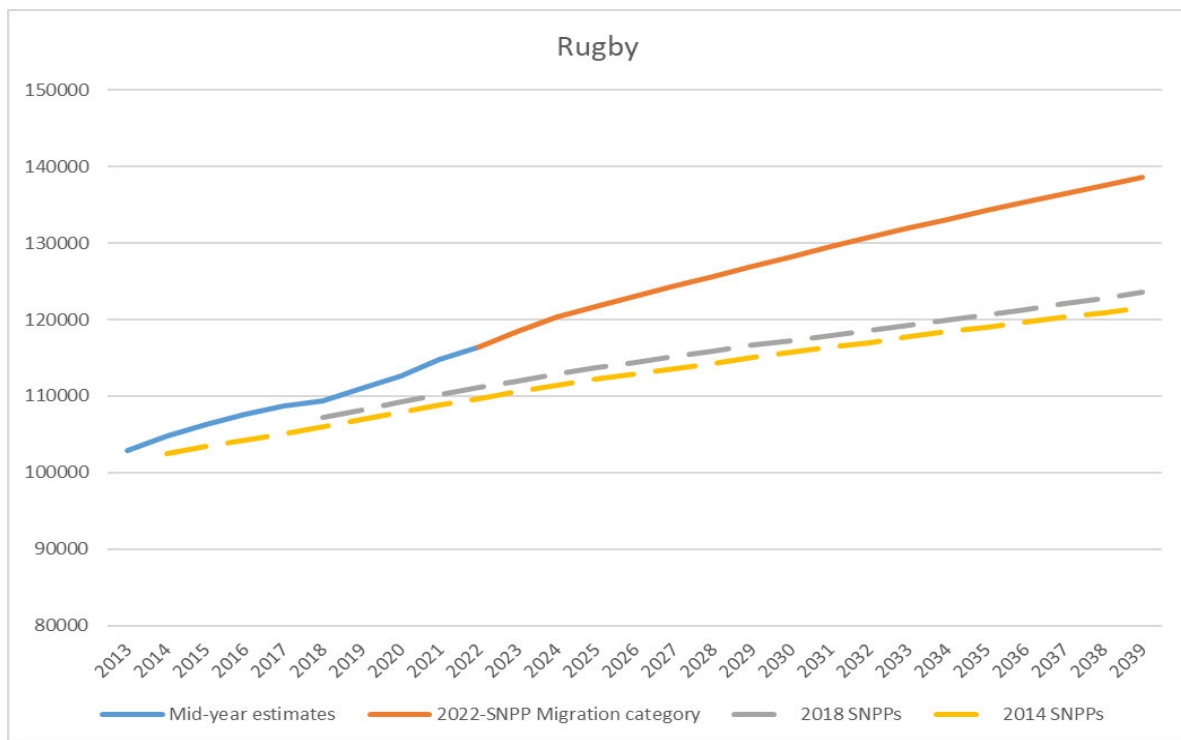
10yr Change Average Households	2014-based HHPs	HEDNA Revised Projections	2022-based HHPs
Rugby	424	604	746
Coventry	2103.8	1296	2080
North Warks	139.1	94	270
Nuneaton and Bedworth	352.5	332	523
Warwick	475.1	571	759
Stratford-upon-Avon	399	614	1272
Total	3893.5	3511	5649.2

Source: HEDNA (2022), DLP Analysis

5.44 Elsewhere in Coventry & Warwickshire, the revised HEDNA projections appear to have significantly underestimated current demographic and household trends, albeit in some instances this is driven by high levels of international migration since 2021. The former and alternatives to the former standard method are nonetheless suggestive of an underestimate of housing needs that are very unlikely to be being addressed by current levels of delivery but would require the new standard method to be planned for in full. Conversely, in Rugby, current delivery rates correspond to current demographic trends and market signals, as reflected in the official household projections, and yet the Council is planning to provide for below these levels based on the revised standard method.

5.45 Figure 2 below demonstrates that population growth in Rugby has consistently exceeded previously projected trends and is expected to maintain strong population growth across the plan period. However, the Council's proposed requirement will not sustain this trend.

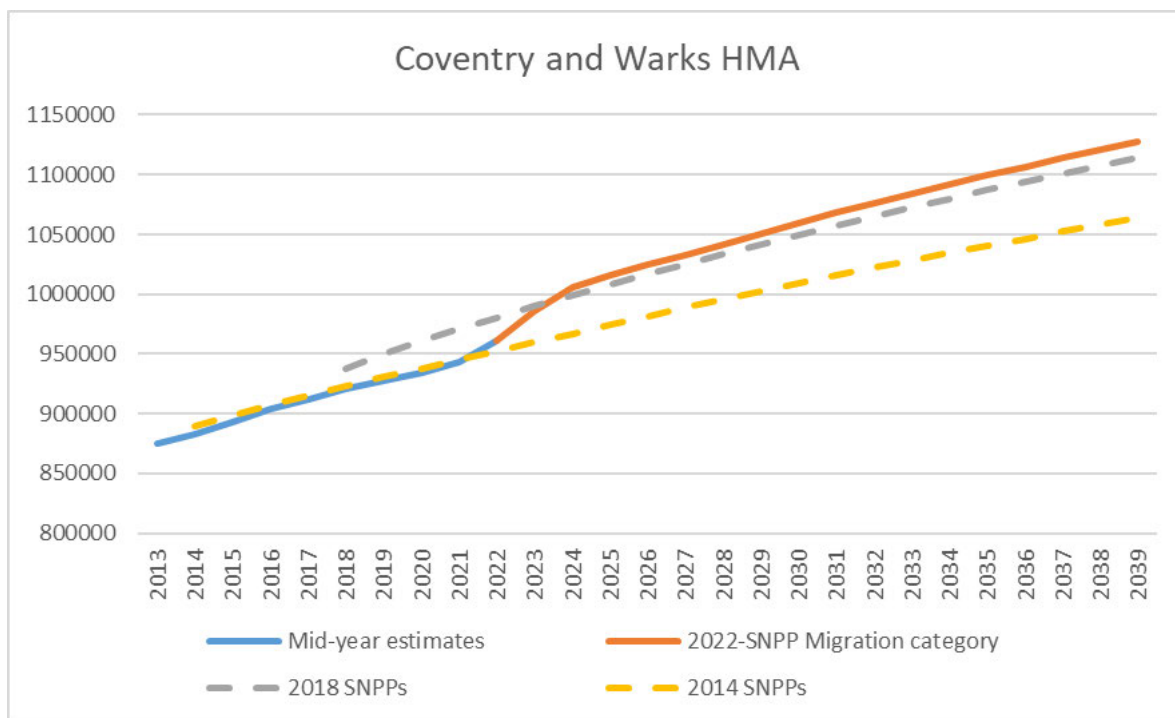
Figure 2: Population Projections and Growth in Rugby



Source: ONS, DLP Analysis

5.46 As shown in Figure 3, the assumptions of the evidence across Coventry & Warwickshire on matters such as aligning jobs and homes are that the revised Standard Method is broadly aligned with the 2022-based household projections and will in-turn necessitate the revised Standard Method to be planned for in full across the HMA. This pressure will be significantly increased if Rugby's provision for housing does not sustain projected trends, particularly given the uplift in delivery already required elsewhere. Historically, total estimates of population have not exceeded total previous projections. This is likely to be a feature of overall constraints to housing delivery, with the effect that increased delivery (and an ability to support sustainable population and jobs growth in Rugby) has increased the overall importance of the area in addressed needs.

Figure 3: Population Projections and Growth in Coventry & Warwickshire HMA



Source: ONS and DLP Analysis

- 5.47 The implications for this in Rugby are, confusingly, considered across at least three separate documents.
- 5.48 Firstly, the Topic Paper: The Development of Rugby Borough 2011-2024 shows population expansion has been rapid between 2011 and 2021 at a growth rate of 14.3%. This positions Rugby as the highest growing authority in the West Midlands and 17th out of 367 local authorities in England and Wales (Topic Paper: The Development of Rugby Borough 2011-2024). Importantly, the average age of the authority has remained the same over this period, countering trends towards an ageing population that the modelling in the Housing Needs Evidence suggests will be exacerbated by planning for local housing need. However, despite this evidence the Topic Paper ignores any reference to the official subnational population projections in terms of how these provide an indicator of future demand.
- 5.49 Secondly, the latest evidence base contained in the Jobs-Homes Alignment Paper is predicated on the revised Standard Method and a lower level of housing growth than recommended in the previous HEDNA. While the alignment is not disaggregated at authority level it follows that for Rugby this is likely to support lower population growth than is currently expected in official projections. Making provision for local housing need as the housing requirement is therefore likely to constrain potential growth in labour supply significantly below project growth in the working age population that would otherwise be expected to occur. Paragraph 4.6 of the Alignment Paper indicates that projected population growth under the standard method allows for improved household formation – in other words the population growth of only 13,800 people allowed for in the Updated Housing Needs Evidence.

- 5.50 Existing population trends support a much stronger growth in the labour force locally, and that this will be reflected in local market signals supporting employment growth and retaining employment within the FEMA (including Coventry). There is little prospect that other authorities in Coventry & Warwickshire will rapidly increase delivery to offset the population growth in projected trends that will be constrained in Rugby. The effects of this in practice are likely to mean constraining opportunities for economic growth in Rugby; and failing to support a sustainable balance between homes and jobs locally. This applies particularly if, in the shorter-term, there is an increased reliance on in-commuting to satisfy labour demand and in the longer-term constraints on opportunities to support economic growth force residents to commute further to work elsewhere. These constraints will also deprive sustainably located centres for employment such as DIRFT (as well as Coventry) workers that form part of current commuting patterns under recent population trends.
- 5.51 Third, the Council considers the position on setting an appropriate housing requirement in the 'Development Needs' Topic Paper and concludes, based on its assessment of NPPF2024 paragraphs 62 and 69 and PPG ID: 2a-002 and 2a-040, it is not necessary to set this above the calculation of local housing need. The Council is incorrect. It's conclusions on the housing requirement are unsound and inconsistent with national policy and guidance.
- 5.52 The reasons for this, particularly in respect of affordable housing needs below, are addressed separately as part of objections to Policy H2 that feed into the requirement, for soundness, to set a housing requirement in excess of the standard method.

c) Summary

- 5.53 Considering our points above regarding the housing trajectory, five-year housing supply, affordable housing and the population projections, we find Policy S2 unsound in its current form. A greater number of allocations would help to support the Plan in meeting and exceeding its housing requirement to accommodate expected population growth.
- 5.54 The Barby Lane site is an appropriate, available and deliverable site. The site was previously assessed by the Council to be a suitable allocation as it was included within the Regulation 18 draft Plan. The allocation of this site for 150 units, which would represent a less intensive form of development than the 380 units previously proposed by the Council, would help to ensure the Plan is positively prepared, justified, effective and consistent with national policy.

6.0 POLICY S6 – RESIDENTIAL ALLOCATIONS

- 6.1 Policy S6 sets out the allocated sites proposed to be delivered during the Plan period to meet the LHN requirement.
- 6.2 In the Regulation 18 version of the draft Plan, the Land off Barby Lane site was allocated for 380 dwellings. However, the site has been removed in the Regulation 19 version of the Plan in the context of a substantial number of deletions and substitutions of proposed allocations on Green Belt land.
- 6.3 Paragraph 147 of the NPPF states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. Other reasonable options for meeting the identified need for development include making as much use as possible of suitable brownfield sites and underutilised land, and optimising the density of development, including in towns and locations well served by public transport.
- 6.4 Paragraph 148 of the NPPF2024 also requires regard to achieving sustainable patterns of development including channelling development towards locations beyond the outer Green Belt boundary. In the case of Rugby this includes the town itself as a demonstrably sequentially preferable location in sustainability terms.
- 6.5 As part of our representations, we have analysed the sites allocated within Policy S6 to determine how many of which are on Green Belt land and the number of units that this represents. The table below shows the results of these calculations.

Table 8: Green Belt Analysis of Sites Allocated in Policy S6

	Number of Sites	Number of Units
Green Belt Sites	12	1436
Total Sites	35	2886
% of Total Sites in Green Belt	34.3%	49.8%

Source: DLP Analysis

- 6.6 Analysis reveals that 12 sites are located in the Green Belt, which forms 34.3% of the total number of allocated sites. The allocated Green Belt sites contribute nearly 50% of the total number of units allocated at 1,436 dwellings.
- 6.7 Even accounting for proposed allocations that the Council considers meet the classification of Grey Belt, which should in any event not be prioritised ahead of non-Green Belt land, a significant quantum of growth is proposed on non-Grey Green Belt land. This relates to 650 units of proposed growth at Long Lawford. This is summarised below:

Table 9: Further Green Belt Analysis of Sites Allocated in Policy S6

	Number of Sites	Number of Units
Proposed Grey Belt Sites	10	786
Green Belt Sites	12	1436
GB % of Total Sites	83.3%	54.7%

Source: DLP Analysis

- 6.8 While the Council states the exceptional circumstances for this include sustaining the village Primary School it is clear that the Council has considered the justification for this change yet has provided no further site selection conclusions in relation to the opportunities for our client's site to support the English Martyrs Primary School in a non-Green Belt location.
- 6.9 It is therefore unclear why the Barby Lane site was deleted as an allocation whilst sites within the Green Belt remained and have been added. The Policy is therefore not consistent with national policy regarding the protection of the Green Belt, nor is it justified. Policy S6 is therefore unsound.

7.0 POLICY EN3 – RAINSBROOK VALLEY LANDSCAPE OF ELEVATED SENSITIVITY

- 7.1 Policy EN3 defines the Rainsbrook Valley landscape of elevated sensitivity. The policy outlines the need to protect, reinforce and where possible enhance the landscape character, taking into consideration various landscape factors. The importance of safeguarding views and minimising adverse visual impacts on the edge escarpment is stated.
- 7.2 These representations are accompanied by the **Land East of Barby Lane, Hillmorton – Landscape Sensitivity Assessment** (RPS, 2026) included as Appendix 5 (and supporting files). This should be read alongside and as constituting part of the objections to Policy EN3. The Landscape Sensitivity Assessment aims to understand the newly revised and allocated sensitivity (as reflected in draft Policy EN3) of the our client's land following its reclassification as an omission site. Its context is therefore considered based on existing factors of sensitivity, and therefore assess if there is any further justification on the reported increased levels of sensitivity within the Rainsbrook Valley Sensitivity Assessment ('RSVA') (Node, 2025) prepared on behalf of the Council. The RPS Sensitivity Assessment also reflects the background to site promotion and the reasons for the Council previously highlighting the site's potential for development.
- 7.3 The RPS Assessment also considers the two Development Framework Plan Options contained within these representations (Figures 3 and 4 in the RPS Report). It reflects that these illustrate two potential options for the development of the Land within the Site and the encompassing landscape buffers, mitigation, screening and POS that could be incorporated.
- 7.4 The RPS Report reflects that a combined **Medium** value and **Medium-Low** susceptibility results in a **Medium to Low** landscape sensitivity of the Site. Consistent with previous evidence submitted to support the site's draft allocation considerations within the Framework Plan Options reflect that the development aims of the Site can be bolstered by minimising the extent of proposal and thus the potential landscape effects within the immediate context and scope of the existing urban settled fringe of Hillmorton. The surrounding residential areas situated to the north along the plateau of the escarpment would help to further encapsulate any proposed residential development within the Site in the north.
- 7.5 These conclusions are consistent with the Lepus 'Landscape Sensitivity Assessment for Larger Sites' findings in respect of Site ID: 334 finding an overall rating of *Medium*. Amongst the findings on landscape value for the site are that there are no biodiversity designations or heritage assets within the site, though the network of hedgerows and trees hold biodiversity value. Views into the site from nearby listed buildings and scheduled monuments in Hillmorton are obscured by intervening buildings.
- 7.6 The RPS Report finds that while the RSVA (2025) has informed the preparation of Policy EN3 and is determined to have superseded the previous 2017 Sensitivity Assessment, the encompasses a broad tract of land to inform the value criteria referred to in the draft Policy. The extend of the area extends beyond the LPA boundary. As summarised in the RPS Report:

The identified sensitive area does not preclude development, and it encompasses a variety of built form and landscape elements featured throughout the area. The large assessment area includes various settlements of different sizes, villages, major roads and infrastructure such as the M45 motorway (which bisects the assessment area east to west), as well as areas of industry, human influence and the like which are deemed

less sensitive.

- 7.7 The summary of the value applied as being noted 'good' and elevated above 'ordinary' therefore is only representative of the wider assessment area and does not consider the factors at the granular level within the Site itself. This does not represent a position on the inherent factors of susceptibility of the Omission Site as it is closely linked to the baseline context of the character of the Site itself, as well as the specifics of the type of development proposed.
- 7.8 The RSVA as conducted provides only large scale, wider judgements and justifications on sensitivities of the RSVA search area, using elements of the landscape baseline and fabric such as Country Parks, Registered Parks and Gardens, and Heritage assets that were not replicated within or in a proximal relationship to the Site itself.
- 7.9 The aspects of sensitivity, as derived from the inherent value and susceptibility of the landscape, and as supporting the site's suitability for development based on existing evidence, have not changed.
- 7.10 The proposed approach to Policy EN3 is similarly unsound without the ability to consider its application at the site specific level. As noted in the RPS Report at Paragraphs 4.32 and 4.33:
- The Policy EN3: Rainsbrook Valley Landscape of Elevated Sensitivity, which is derived from RVSA 2025, does not itself prohibit development within the policy area. It states in part C that important views should be safeguarded, in order to 'minimise adverse visual impacts on the edge of the escarpment.'*
- 4.33 It also goes on to state that the findings of the RSVA 2025 and justification within afford a 'higher degree of consideration' when considering development within the area. Therefore, by omitting the Site from the previous allocation, RBC contravenes the policy by prohibiting development when the intrinsic landscape elements and features within the Site and its subsequent sensitivity has not changed since the previous application.*
- 7.11 While this demonstrates why proposals for development must be capable of being addressed as appropriate at the site level even in the context of Policy EN3 its inclusion in the Plan can broadly be regarded as unnecessary. The Plan contains approach provisions in Policies D1, D3 and EN2 that demonstrate why Policy EN3 serves little practical purpose, and provides no relevant evidence, to inform the Council's strategic response in respect of landscape assessment and, where necessary appropriate design response, with regards NPPF2024 paragraphs 135, 187 and 188.
- 7.12 The conclusions address why the Council's approach to site assessment and changes to its conclusions on site selection are unsound. Nevertheless, provided that Policy EN3 is modified to reflect in which circumstances development will be supported (in order to be positively prepared) the basis of the RBC Local Plan Policy EN3 does not in itself prohibit, limit or determine that the area of the Rainsbrook Valley of Elevated Sensitivity is unsuitable for development; rather, the policy makes note of the consideration of the RSVA 2025 as well as suggesting ways to minimise adverse impacts on the edge of the escarpment.

8.0 POLICY H1 – HOUSING MIX

- 8.1 Policy H1 states that new housing developments shall contribute to meeting the housing needs of the borough as identified in the Housing Needs Evidence (2025) and any other appropriate local evidence. This means that new residential development shall maintain, provide or contribute to a mix of housing tenures, types and sizes to support the creation of mixed, balanced and inclusive communities. The policy specifically addresses major developments and outlines that they will accommodate a range of dwelling sizes on site.
- 8.2 We agree with the policy in terms of major sites accommodating a range of dwelling sizes on site as this is justified by evidence including the Updated Housing Needs Evidence for Rugby Borough Paper (2025).
- 8.3 However, it should be noted that other policies in the Plan as outlined above set out a housing requirement which is below the housing need of the borough. As a result, whilst Policy H1 seeks to ensure an appropriate mix of housing types and sizes to qualitatively meet demand, the effectiveness of the policy is ultimately reduced as the Plan is not prepared to quantitatively address the clear evidence that local housing need is greater than the result of the standard method.
- 8.4 Ultimately the evidence of demographic trends and market signals for population growth that will not be supported through provision for a housing requirement based on the standard method is that the growth in the younger working age population will be constrained. The negative effects of this will be particularly concentrated at the principal settlement of Rugby.
- 8.5 While criterion A of Policy H1 is flexibly worded it is nonetheless necessary for soundness that this contains provision to consider specific proposals for a given housing mix that address evidence of unmet needs associated with population and household growth. The precise details of these unmet needs cannot be pre-determined but could, for example, include an supporting the provision of family housing (should existing stock not be freed up as anticipated) or optimising the potential for development of sites (perhaps including higher density) associated with the provision of a higher number of smaller units for first-time buyers.
- 8.6 The Barby Lane site is an appropriate, available and deliverable site which can provide a flexible development that responds to the requirements of the policy, meeting housing needs both qualitatively in terms of tenure, type and size, and quantitatively in terms of overall housing supply.

9.0 POLICY H2 – AFFORDABLE HOUSING

9.1 Policy H2 states that developments which result in ten or more new homes shall provide at least the following proportion of new homes as affordable homes:

- (i) *Within the Rugby urban area: 20%*
- (ii) *Elsewhere in the borough: 30%*
- (iii) *On sites released from the Green Belt through this plan or other Green Belt permissions: 40%*

9.2 The Policy also sets out that the tenure mix of affordable homes should be 70% social rent and 30% shared ownership.

9.3 Whilst we agree with the requirements set out above, it is clear that the Plan will not meet affordable housing needs in full which renders the policy ineffective in ensuring that affordable housing delivery aligns with assessed need.

9.4 The Development Needs Topic Paper considers recent delivery rates and the assessment of affordable housing need. However, it makes no reference to the latest population projections.

9.5 PPG 2a-021 expressly requires plan-makers to consider the latest household projections in considering likely newly arising affordably housing needs. The standard method provides an unconstrained starting point in terms of a baseline for growth in the dwelling stock but it does not constitute the assessment of *need* for different groups referred to in paragraph 62 of the NPPF or the *identified needs* that should be considered for the purposes of setting the housing requirement in paragraph 69 when the outputs of this work are considered.

9.6 The fallacy of the Council's position in not drawing these factors together is illustrated when the Updated Housing Needs Evidence and original HEDNA are read together and applied alongside the PPG. Paragraph 2.4 of the Updated Evidence acknowledges that the HEDNA produced a suggested alternative to the former standard method of 735dpa, which took account of how existing demographic trends inform alternative *household* projections. For the purposes of assessing gross newly arising affordable housing needs the HEDNA utilised these more robust alternative household projections (pre-dating the latest 2022-based information) to provide a robust assessment of future needs. As set out in Table 8.10, for Rugby this assumed gross household formation in accordance with the PPG of 1,053 household per annum.

9.7 The Updated Housing Needs Evidence assumes gross household formation of 1,120 per annum (paragraph 5.31) based on a link to demographic modelling (paragraph 5.30). Although 1,120 exceeds the HEDNA figure the sources are not like-for-like and consider different time periods, underlying household formation rates and the age structure of the population. The source of the modelling in the Updated Evidence is unspecified, but the Council must clarify that this is not based on the local housing need projection supporting less population growth than the official population projections. The Council's Development Needs Topic Paper indicates that it is the constrained projection that has been used:

2.50. It is important to note that the need for affordable housing need is not additional to overall assessed housing need. The largest component of the assessed affordable housing need (73% of gross need) is the proportion of all new households forming under standard method local housing need, who would, based on average income levels, be unable to afford to rent or buy in the market without benefits and without spending more

than 30% of their income on housing costs.

2.51. This means that if the housing requirement is increased, the affordable housing need will increase lockstep with this. More houses would mean more household formation – largely driven by increased migration to the area – and an equivalent proportion of those newly forming households would need affordable housing.

- 9.8 This overlooks the point that local housing need already fails to support existing population projections and would force existing population and households, including those in affordable housing need, out of Rugby through *increased out-migration*. The Council's selected housing requirement essentially seeks to reduce and ignore local housing need.
- 9.9 This is particularly the case if the local housing need projection with improvements to household formation has been used. Applying this improvement to a 'constrained' dwelling-led local housing need figure that supports *fewer* people than the official population projections would simply reduce the level of affordable housing need that would be met (relative to the total number of households that would form in the dwelling figure was not constrained *and* household formation improved).
- 9.10 It is also the case that while the Council claims its own (constrained) projection produces affordable housing need that is around 32% of the standard method result, and that it is not necessarily the case that this will be met in full, it has provided no details in the evidence base of how many affordable homes it will achieve over the plan period. The Council is increasingly reliant on a small number of strategic sites such as South West Rugby – where the ability to achieve affordable housing contributions is contested in some instances – and Houlton (achieving around 20% affordable housing in early phases). Only 96 affordable homes were completed in 2024/25 as overall delivery rates fell.
- 9.11 It is also the case that net contributions to supply in the Council's evidence base, such as re-lets, are predicated on the recent period of higher rates of housing delivery potentially providing opportunities for new household formation in both the market (sale and rent) and affordable sectors.
- 9.12 Considering our points above, we find Policy H2 unsound in its current form. A broad range of new allocations, providing the best prospects of securing full affordable housing contributions, are essential to ensure that the Council meets as much need as possible and sustains net contributions to supply consistent with the evidence base. Without this, the ability to meet future needs and churn in supply are likely to be significantly constrained. For the avoidance of doubt, locations such as Hillmorton indicate that achieving this is not predicated on exceptional circumstances for amendment to Green Belt boundaries.
- 9.13 These represents are submitted silently and without prejudice in relation to the specific requirements for affordable housing arising under the policy should additional sites at Hillmorton be identified for growth . In the Council's Preferred Option Plan for Site ID: 334 the *Development Requirements* did not state the applicable affordable housing percentage.
- 9.14 The Council has now precluded further inclusion of development in the most sustainable locations at the urban edge. Should these be identified it is anticipated that further viability testing may be undertaken in relation to associated requirements and costs associated with these locations.
- 9.15 It is self-evident that even at the lower 20% threshold development within Rugby at the settlement edge would be likely be achieve a more significant boost to affordable housing

delivery than through existing commitments and urban development at the town where the evidence acknowledges full contributions are unlikely to be secured. Conversely, subject to appropriate evidence soundly-based policies for this location seeking 30% contributions would be a substantial benefit of development (and towards addressing needs) without the associated impact and phasing implications of development in the Green Belt. This would constitute a more immediately deliverable boost to supply.

- 9.16 In the context of this uncertainty surrounding the Council's evidence base and its position on support for growth at the urban edge the inclusion of criterion D to Policy H2 (in terms of circumstances where off-site contributions may be appropriate is necessary for soundness. In the context for the submission draft Plan it is also necessary to reflect the provisions for viability testing at paragraph 6.5 within Policy H2 itself.
- 9.17 The Barby Lane site is an appropriate, available and deliverable site. The site was previously assessed by the Council to be a suitable allocation as it was included within the Regulation 18 draft Plan. The allocation of this site for around 170 or 220 units, which would represent a less intensive form of development than the 380 units previously proposed by the Council, would help to ensure the Plan is positively prepared, justified, effective and consistent with national policy and still address a significant contribution towards affordable housing need.

10.0 POLICY H7 – HOUSING STANDARDS

- 10.1 Policy H7 outlines that all new dwellings shall, as a minimum, meet the Nationally Described Space Standards. It also sets out that all new dwellings shall meet the requirements for Category 2 – accessible and adaptable dwellings set out in Part M4(2) of Schedule 1 to the Building Regulations (2010) as amended. Additionally, 3.5% of dwellings shall meet the requirements for Category 3 – wheelchair user dwellings set out in Part M4(3) of the legislation. Minimum garden and private outdoor space requirements are set out.
- 10.2 The approach to Policy H7 is broadly supported. The justification for the policy in-part stems from the strategy - which does not propose a housing requirement reflective of evidence that need exceeds the result of the standard method – is heavily reliant on existing commitments that *will not* deliver the policy requirements sought to improve standards as set out in the evidence base.
- 10.3 Nevertheless, the Council has not provided evidence to support the inclusion of criterion A to Policy H7 in relation to the Nationally Described Space Standards. The PPG (ID: 56-020-20150327) requires that evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes. This is separate to the requirements for viability testing, which the Council has undertaken albeit viability constraints are evident for a high proportion of sites at Rugby. In these circumstances schemes required to provide for the NDSS particularly in these locations are likely to experience barriers to their delivery.
- 10.4 The Council is now effectively proposing to constrain population growth through its selected housing requirement. Set against the high volume of commitments (albeit predominantly Outline) at Houlton and South West Rugby the Council has provided no indication of whether committed supply is likely to deliver development in accordance with suggested housing mix or whether delivery is expected to provide the majority of units above or below the space standards.
- 10.5 Broadly speaking the concern with introducing the NDSS is that where development does come forward in the context of high pressure for population growth is exactly as stated in the PPG: the need for development includes strong growth in younger populations (commensurate with needs for starter homes across all tenures) not fully provided for through the housing requirement. Introducing the NDSS risks posing barriers to addressing these needs and making the most effective use of land and a timely boost to supply in circumstances where mandating delivery of this requirement is not justified by evidence of recent or committed supply and housing mix.

11.0 POLICY I4 – INFRASTRUCTURE AND PLANNING OBLIGATIONS

- 11.1 Policy I4 states that new development that exceeds the capacity of existing infrastructure or causes unacceptable impacts will only be permitted where it can be demonstrated that there is a reliable mechanism in place to deliver the requisite infrastructure upgrades when required and to mitigate the impacts.
- 11.2 Criterion B of the policy states that planning obligations may include retrospective contributions towards infrastructure improvements which have been fully or partly delivered at the date the relevant obligation is entered into, but which deliver necessary mitigation for the proposed development.
- 11.3 Paragraph 58 of the NPPF which states that planning obligations must only be sought where they meet all of the following tests:
- (a) *Necessary to make the development acceptable in planning terms;*
 - (b) *Directly related to the development; and*
 - (c) *Fairly and reasonably related in scale and kind to the development.*
- 11.4 In seeking retrospective contributions, the Council are required by Paragraph 58 to state which schemes may need to make contributions, relating to identified impacts the given project may generate. Within the Infrastructure Schedule there is no such indication of projects where retrospective contributions for schemes in a given location under criterion B may apply. The policy is therefore not consistent with national policy and is unsound in its current form.
- 11.5 Criterion B, the purpose of which may relate to projects in SW Rugby or Houlton for which there are funding uncertainties, has the potential to seriously delay the pace of decisions. This would arise where the absence of evidence at the plan-making stage results in challenge to whether contributions are necessary and directly related to funding projects retrospectively. Anything retrospective risks the accusation that the contributions are to address an existing deficit, which is contrary to legislation.
- 11.6 The Barby Lane site is a freestanding location at South Rugby and is not reliant on growth at Houlton or SW Rugby. Moreover, the Council has not fully explored the requirements or opportunities for infrastructure in this location. In relation to Barby Lane site, it would not raise an issue of retrospective contributions but it could, significantly, safeguard land for the expansion of primary school places if required under both Framework Options presented.

12.0 POLICY I5 – NEW RAILWAY STATIONS

- 12.1 Policy I5 states that land is safeguarded to support the delivery of the proposed Nuneaton Parkway and Rugby Parkway railway stations.
- 12.2 The safeguarding of land for new rail infrastructure is supported, particularly at Rugby Parkway railway station for which a planning application has recently been submitted. This will enhance public transport links, not just for the town itself, but also reinforcing the sustainability of strategically significant employment links at Daventry International Rail Freight Terminal, which are easily accessible from the south of Rugby.
- 12.3 However, the settlement hierarchy does not appear to reflect this policy as it prioritises significant planned expansion at other settlements ahead of these clear opportunities to align strategic priorities for sustainable development at the principal settlement of Rugby. As set out in our concerns related to the Sustainability Appraisal the definition of reasonable alternatives at Hillmorton expresses the importance of the Parkway Station for strategic context yet somehow (principally by not testing the specific effects of adding Hillmorton to scenario options) indicates that additional growth close to the Station would have *worse* effects against sustainability indicators. Such an outcome is not only unsound and not legally compliant; it is plainly irrational.
- 12.4 We endorse the summary of the strategic context for the Parkway station outlined in the SLC Report 'Rugby Parkway Station Safeguarding Land for Future Expansion'
- "The station is to be located on the Northampton Loop Line, near the Hillmorton area of Rugby, and close to major new housing developments at Houlton and Southwest Rugby as well as employment expansion at the Daventry International Rail Freight Terminal (DIRFT). The station will service the travel demands arising from an expanding population to the south of Rugby including a 6,200 dwelling housing development at Houlton immediately adjacent to the station site. The station will be served by existing London Northwestern train services operating at a half hourly frequency between Birmingham and London (via Northampton). Additionally, the station's introduction will relieve pressure on the existing stations at Rugby and Long Buckby where car parking demand regularly exceeds capacity."*
- 12.5 The SLC Report also provides a timetable for potential completion of the station by 2029 (Figure 3, pp.9). The Infrastructure Schedule accompanying the Plan notes the notwithstanding the funding position delivery of the project is crucial for the strategy.
- 12.6 It is necessary for soundness to include the milestone for potential completion of the project within Policy I5. This provides an important tool for monitoring in terms of whether the project has been achieved. Potential indicators for its benefits could include numbers of services and passengers and its role in supporting modal shift. Crucially, these milestones and indicators also provide an important reference in the context of the Plan's failure to address full housing needs and likely shortfall in delivery.
- 12.7 By 2029/30 we forecast a shortfall in delivery against local housing need of around at least 500 units. In the context of the forecast delivery of a significant asset at the Parkway Station in the same time period this provides a clear indication of an appropriate location to address shortfalls in supply and this can be cross-referenced in Policy I5.
- 12.8 The Plan more widely requires policy criteria to support permission for unallocated sites in the vicinity of the station where shortfalls in housing land supply arise.
- 12.9 In this context, the proximity of the Barby Lane site to the proposed Rugby Parkway station

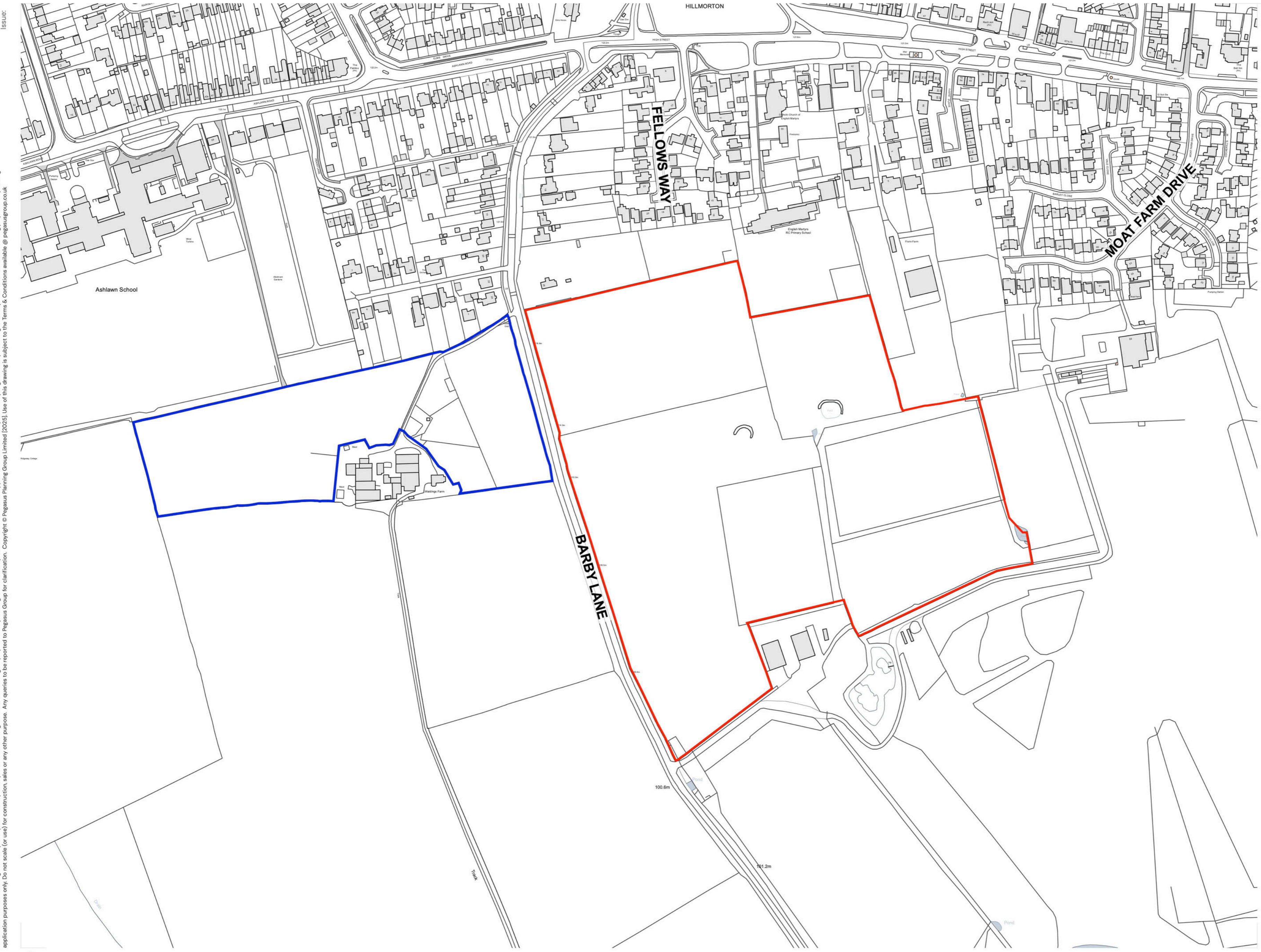


represents a significant opportunity to support sustainable patterns of development. The Barby Lane site is an appropriate, available and deliverable site and, considered alongside Policy I5, the allocation of which would be consistent with Paragraph 7 in contributing to the achievement of sustainable development.



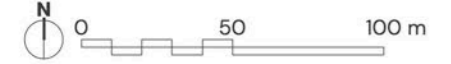
Appendix 1 Site Location Plan

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KEY

- SITE BOUNDARY
12.93 HA / 31.95 AC
- LAND BEING PROMOTED BY
CATESBY ESTATES
4.05 HA / 10.01 AC



BARBY LANE, RUGBY – SITE LOCATION PLAN

| PEGASUSGROUP.CO.UK | TEAM/DRAWN BY: AP | APPROVED BY: SB | DATE: 17/12/2025 | SCALE: 2500@A2 | DRWG: P25-1170_DE_001_03B | CLIENT: PERSIMMON HOMES |





Appendix 2 Development Framework Plan Option 1

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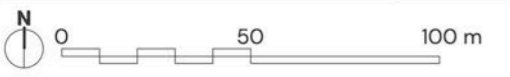


- ### KEY
- SITE BOUNDARY
 - SITE ACCESS VIA BARBY LANE
 - RESIDENTIAL DEVELOPMENT UP TO 170 DWELLINGS
 - SCHOOL EXTENSION LAND 0.5 HECTARES
 - PUBLIC OPEN SPACE (inc suds) 4.34 HECTARES - 44% OF TOTAL REDLINE AREA
 - TREE LINED PRIMARY STREET
 - TREE LINED SECONDARY STREET
 - TREE LINED TERTIARY STREETS
 - FOCAL SPACES
 - PRIVATE LANES
 - ACTIVE TRAVEL ROUTES
 - EXISTING TREES
 - NEW STRUCTURAL PLANTING
 - NEW BUFFER PLANTING
 - NEW TREE PLANTING
 - COMMUNITY ORCHARD
 - LOCALLY EQUIPPED AREA FOR PLAY (LEAP)
 - LOCAL AREA OF PLAY (LAP)
 - INFORMAL KICK ABOUT SPACE
 - PLAY ON THE WAY TRAIL LOCATIONS
 - POTENTIAL GREAT CRESTED NEWTS PRESENT WITH 50M OFFSET
 - SUSTAINABLE DRAINAGE
 - EXISTING BODIES OF WATER
 - EXISTING PUBLIC RIGHTS OF WAY
 - POTENTIAL CYCLE AND PEDESTRIAN CONNECTION
 - 5M CONTOURS

- ### KEY PRINCIPLES
1. PRIMARY ACCESS POINTS VIA BARBY LANE;
 2. PRIMARY VEHICULAR MOVEMENT WITH INTEGRATED TREE PLANTING AND GRASS VERGES;
 3. SECONDARY STREETS RUN WEST TO EAST, INCORPORATING TREE PLANTING, GRASS VERGES AND RESPOND TO THE SITE'S TOPOGRAPHY;
 4. KEY ACTIVE TRAVEL ROUTES PROVIDING A FULLY CIRCULATORY MOVEMENT INFRASTRUCTURE;
 5. PROPOSED MARTYRS COMMON AND MOAT COMMON PROVIDING EQUIPPED AREA OF PLAY;
 6. SERIES OF THEMED GREENS PROVIDING INFORMAL PLAY AND RECREATION;
 7. COMMUNITY USE SPACES IN THE FORM OF COMMUNITY ORCHARD;
 8. MAXIMUM RETENTION OF EXISTING TREES AND HEDGEROWS ON SITE, FORMING GREEN CORRIDORS AND WALKING ROUTES;
 9. PROPOSED NATIVE LANDSCAPE BUFFER ALONG THE SOUTHERN BOUNDARY OF THE SITE ;
 10. EXISTING VEGETATION ALONG THE WESTERN BOUNDARY ENHANCED WITH PROPOSED NATIVE PLANTING, AND THE DEVELOPMENT ENVELOPE IS SET BACK FROM BARBY LANE TO CREATE A GREEN CORRIDOR;
 11. ADDITIONAL TREE/HEDGEROW PLANTING ALONG THE NORTHERN BOUNDARY TO 'GAP UP' EXISTING HEDGEROW IN PLACES AND HELP TO PROTECT THE PRIVACY OF THE EXISTING ADJACENT PROPERTY;
 12. POTENTIAL PEDESTRIAN AND CYCLE CONNECTIONS TO SURROUNDING CONTEXT;
 13. MAXIMUM OUTWARD FACING DEVELOPMENT OVER NEWLY CREATED PUBLIC OPEN SPACE;
 14. POTENTIAL CYCLE AND PEDESTRIAN CONNECTION TO THE HIGH STREET AND FLORIN PLACE
 15. PROPOSED MARTYRS PARKLAND PROVIDING WALKING ROUTES AND PUBLIC OPEN SPACE FOR RECREATION AND LEISURE
 16. THE EXISTING ON-SITE DRAINAGE POND WILL BE RETAINED AND INTEGRATED INTO THE PROPOSED DRAINAGE STRATEGY FOR THE DEVELOPMENT

Rugby Borough Council- Open Space, Playing Pitch and Sports Facilities Study November 2015

TYPOLGY	MINIMUM PROVISION PER 1,000 PEOPLE	PROVISION FOR SITE (170 UNITS @ 2.35 PERSONS PER HOUSEHOLD)	ACHIEVED	AREA (HA)
Parks & Gardens	1.50	0.90	Y	0.85
Natural and semi natural green spaces	2.50	1.90	Y	2.47
Green corridors	0.40	0.16	Y	0.36
Outdoor sports facilities	3.50	1.40	OFF SITE PROVISION	0
Amenity green space	1.10	0.44	Y	0.55
Provision for children and young people	0.20	0.08	2X LEAP, 3X LAP	0.11
Allotments and community gardens	0.65	0.26	OFF SITE PROVISION	0
Cemeteries and churchyards	0.50	0.20	OFF SITE PROVISION	0



BARBY LANE, RUGBY - DEVELOPMENT FRAMEWORK PLAN





Appendix 3 Development Framework Plan Option 2

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KEY

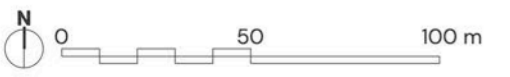
- SITE BOUNDARY
- SITE ACCESS VIA BARBY LANE
- RESIDENTIAL DEVELOPMENT UP TO 212 DWELLINGS (AT 35 DPH)
- SCHOOL EXTENSION LAND 0.5 HECTARES
- PUBLIC OPEN SPACE (inc suds) 6.33 HECTARES - 49% OF TOTAL REDLINE AREA
- TREE LINED PRIMARY STREET
- TREE LINED SECONDARY STREET
- TREE LINED TERTIARY STREETS
- FOCAL SPACES
- PRIVATE LANES
- ACTIVE TRAVEL ROUTES
- EXISTING TREES
- NEW STRUCTURAL PLANTING
- NEW BUFFER PLANTING
- NEW TREE PLANTING
- COMMUNITY ORCHARD
- ★ LOCALLY EQUIPPED AREA FOR PLAY (LEAP)
- ★ LOCAL AREA OF PLAY (LAP)
- ★ INFORMAL KICK ABOUT SPACE
- ★ PLAY ON THE WAY TRAIL LOCATIONS
- ★ POTENTIAL GREAT CRESTED NEWTS PRESENT WITH 50M OFFSET
- ★ SUSTAINABLE DRAINAGE
- ★ EXISTING BODIES OF WATER
- EXISTING PUBLIC RIGHTS OF WAY
- ★ POTENTIAL CYCLE AND PEDESTRIAN CONNECTION
- 5M CONTOURS

- ### KEY PRINCIPLES
1. PRIMARY ACCESS POINTS VIA BARBY LANE;
 2. PRIMARY VEHICULAR MOVEMENT WITH INTEGRATED TREE PLANTING AND GRASS VERGES;
 3. SECONDARY STREETS RUN WEST TO EAST, INCORPORATING TREE PLANTING, GRASS VERGES AND RESPOND TO THE SITE'S TOPOGRAPHY;
 4. KEY ACTIVE TRAVEL ROUTES PROVIDING A FULLY CIRCULATORY MOVEMENT INFRASTRUCTURE;
 5. PROPOSED MARTYRS COMMON AND MOAT COMMON PROVIDING EQUIPPED AREA OF PLAY;
 6. SERIES OF THEMED GREENS PROVIDING INFORMAL PLAY AND RECREATION;
 7. COMMUNITY USE SPACES IN THE FORM OF COMMUNITY ORCHARD AND ALLOTMENTS;
 8. MAXIMUM RETENTION OF EXISTING TREES AND HEDGEROWS ON SITE, FORMING GREEN CORRIDORS AND WALKING ROUTES;
 9. PROPOSED NATIVE LANDSCAPE BUFFER ALONG THE SOUTHERN BOUNDARY OF THE SITE ;
 10. EXISTING VEGETATION ALONG THE WESTERN BOUNDARY ENHANCED WITH PROPOSED NATIVE PLANTING, AND THE DEVELOPMENT ENVELOPE IS SET BACK FROM BARBY LANE TO CREATE A GREEN CORRIDOR;
 11. ADDITIONAL TREE/HEDGEROW PLANTING ALONG THE NORTHERN BOUNDARY TO 'GAP UP' EXISTING HEDGEROW IN PLACES AND HELP TO PROTECT THE PRIVACY OF THE EXISTING ADJACENT PROPERTY;
 12. POTENTIAL PEDESTRIAN AND CYCLE CONNECTIONS TO SURROUNDING CONTEXT;
 13. MAXIMUM OUTWARD FACING DEVELOPMENT OVER NEWLY CREATED PUBLIC OPEN SPACE;
 14. POTENTIAL CYCLE AND PEDESTRIAN CONNECTION TO THE HIGH STREET AND FLORIN PLACE
 15. PROPOSED MARTYRS PARKLAND PROVIDING WALKING ROUTES AND PUBLIC OPEN SPACE FOR RECREATION AND LEISURE
 16. THE EXISTING ON-SITE DRAINAGE POND WILL BE RETAINED AND INTEGRATED INTO THE PROPOSED DRAINAGE STRATEGY FOR THE DEVELOPMENT

Rugby Borough Council: Open Space, Playing Pitch and Sports Facilities Study
November 2015

TYPOLGY	MINIMUM PROVISION PER 1,000 PEOPLE	PROVISION FOR SITE (212 UNITS @ 2.38 PERSONS PER HOUSEHOLD)	ACHIEVED	AREA (HA)
Parks & Gardens	1.50	0.75	Y	0.85
Natural and semi natural green spaces	2.50	1.25	Y	4.04
Green corridors	0.40	0.20	Y	0.36
Outdoor sports facilities	3.50	1.75	OFF SITE PROVISION	0
Amenity green space	1.10	0.55	Y	0.59
Provision for children and young people	0.20	0.10	3X LEAP, 2X LAP	0.11
Allotments and community gardens	0.65	0.32	Y	0.38
Cemeteries and churchyards	0.50	0.25	OFF SITE PROVISION	0

BARBY LANE, RUGBY - DEVELOPMENT FRAMEWORK PLAN





Appendix 4 Whole Plan Trajectory and Land Supply Scenarios



LPA - Housing Trajectory Sheet Summary	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36	2036-37	2037-38	2038-39	2039-2040	2040-41	2041-42	2025-2042
South West Rugby	0	35	65	170	242	283	338	338	338	288	253	238	208	203	198	178	130	
Eden Park	52	10	55	55	55	55	55	55	55	55	50	50	0	0	0	0	0	
Houlton	124	197	219	265	240	241	220	160	154	155	155	155	155	155	155	155	155	
2019 Local Plan Other Allocations	82	28	20	20	15	25	15	0	0	0	0	0	0	0	0	0	0	
Current Permissions & Prior Approvals as of 1 April 2025	259	102	70	40	28	40	82	0	0	0	0	0	0	0	0	0	0	
Windfalls for sites of <5dwellings	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	
New allocations	0	0	0	25	264	378	255	345	345	300	225	255	210	114	80	50	40	
Total Trajectory	567	422	479	625	894	1072	1015	948	942	848	733	748	623	522	483	433	375	11729
Land Supply Base-Date	01-Apr-25	01-Apr-26	01-Apr-27	01-Apr-28	01-Apr-29	01-Apr-30	01-Apr-31	01-Apr-32	01-Apr-33	01-Apr-34	01-Apr-35	01-Apr-36	01-Apr-37	01-Apr-38	01-Apr-39	01-Apr-40	01-Apr-41	
Plan Period (years) remaining	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	
Cumulative Delivery	567	989	1468	2093	2987	4059	5074	6022	6964	7812	8545	9293	9916	10438	10921	11354	11729	
Annual Requirement	636	636	636	636	636	636	636	636	636	636	636	636	636	636	636	636	636	
Cumulative Housing Requirement	636	1272	1908	2544	3180	3816	4452	5088	5724	6360	6996	7632	8268	8904	9540	10176	10812	
Annual versus Requirement	-69	-214	-157	-11	258	436	379	312	306	212	97	112	-13	-114	-153	-203	-261	
Cumulative Surplus / Shortfall to 31 March in y/c	-69	-283	-440	-451	-193	243	622	934	1240	1452	1549	1661	1648	1534	1381	1178	917	
Five-Year Requirement inc. Shortfall	3180	3249	3463	3620	3631	3373	2937	2558	2246	1940	1728	1631	1519					
Plus 5% Buffer	3339	3411.45	3636.15	3801	3812.55	3541.65	3083.85	2685.9	2358.3	2037	1814.4	1712.55	1594.95					
Annualised	667.8	682.29	727.23	760.2	762.51	708.33	616.77	537.18	471.66	407.4	362.88	342.51	318.99					
Supply	2987	3492	4085	4554	4871	4825	4486	4219	3894	3474	3109	2809	2436					
Years' Supply	4.47	5.12	5.62	5.99	6.39	6.81	7.27	7.85	8.26	8.53	8.57	8.20	7.64					

DLP Analysis	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36	2036-37	2037-38	2038-39	2039-2040	2040-41	2041-42	2025-2042
South West Rugby	0	35	65	150	150	150	150	150	338	288	253	238	208	203	198	178	130	
Eden Park	52	10	55	55	55	55	55	55	55	55	50	50	0	0	0	0	0	
Houlton	124	188	188	188	188	188	188	188	154	155	155	155	155	155	155	155	155	
2019 Local Plan Other Allocations	82	28	20	20	15	25	15	0	0	0	0	0	0	0	0	0	0	
Current Permissions & Prior Approvals as of 1 April 2025	259	102	70	40	28	40	82	0	0	0	0	0	0	0	0	0	0	
Windfalls for sites of <5dwellings	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	
New allocations	0	0	0	90	180	180	180	180	345	300	225	255	210	211	180	180	180	
Total Trajectory	567	413	448	593	666	688	720	623	942	848	733	748	623	619	583	563	515	10892
Land Supply Base-Date	01-Apr-25	01-Apr-26	01-Apr-27	01-Apr-28	01-Apr-29	01-Apr-30	01-Apr-31	01-Apr-32	01-Apr-33	01-Apr-34	01-Apr-35	01-Apr-36	01-Apr-37	01-Apr-38	01-Apr-39	01-Apr-40	01-Apr-41	
Plan Period (years) remaining	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	
Cumulative Delivery	567	980	1428	2021	2687	3375	4095	4718	5660	6508	7241	7989	8612	9231	9814	10377	10892	
Annual Requirement	636	636	636	636	636	636	636	636	636	636	636	636	636	636	636	636	636	
Cumulative Housing Requirement	636	1272	1908	2544	3180	3816	4452	5088	5724	6360	6996	7632	8268	8904	9540	10176	10812	
Annual versus Requirement	-69	-223	-188	-43	30	52	84	-13	306	212	97	112	-13	-17	-53	-73	-121	
Cumulative Surplus / Shortfall to 31 March in y/c	-69	-292	-480	-523	-493	-441	-357	-370	-64	148	245	357	344	327	274	201	80	
Five-Year Requirement inc. Shortfall	3180	3111	3472	3660	3703	3673	3621	3537	3550	3244	3032	2935	2823					
Plus 5% Buffer	3339	3266.55	3645.6	3843	3888.15	3856.65	3802.05	3713.85	3727.5	3406.2	3183.6	3081.75	2964.15					
Annualised	667.8	653.31	729.12	768.6	777.63	771.33	760.41	742.77	745.5	681.24	636.72	616.35	592.83					
Supply	2687	2808	3115	3290	3639	3821	3866	3894	3894	3571	3306	3136	2903					
Years' Supply	4.02	4.30	4.27	4.28	4.68	4.95	5.08	5.24	5.22	5.24	5.19	5.09	4.90					
Difference (by Supply Component)	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36	2036-37	2037-38	2038-39	2039-2040	2040-41	2041-42	
South West Rugby	0	0	0	-20	-92	-133	-188	-188	0	0	0	0	0	0	0	0	0	
Eden Park	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Houlton	0	-9	-31	-77	-52	-53	-32	28	0	0	0	0	0	0	0	0	0	
2019 Local Plan Other Allocations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Current Permissions & Prior Approvals as of 1 April 2025	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Windfalls for sites of <5dwellings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
New allocations	0	0	0	65	-84	-198	-75	-165	0	0	0	0	0	97	100	130	140	
Total Trajectory	0	-9	-31	-32	-228	-384	-295	-325	0	0	0	0	0	97	100	130	140	



**Appendix 5 Land East of Barby Lane, Hillmorton – Landscape Sensitivity Assessment
(RPS, 2026) (attached separately)**

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Land to East of Barby Lane, Hillmorton

Regulation 19 – Landscape Sensitivity
Assessment and review
of the Rainsbrook Valley

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10 March 2026

Land East of Barby Lane, Hillmorton – Landscape Sensitivity Assessment

Document status

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- Figure 1:**.....Adopted Rugby Borough Local Plan 2011-2031 Policies Map
Figure 2:.....Regulation 19 – Local Plan Policies Map
Figure 3:.....Development Framework Plan DRWG P25-1170_DE_002_01E
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Appendix

Appendix A: Landscape and Visual Technical Note (Pegasus, May 2025).

Executive Summary

This Landscape Sensitivity Assessment and review of the Rainsbrook Valley is being submitted on behalf of Persimmon Homes West Midlands (the Applicant) in respect of Land at Barby Lane, Hillmorton, Rugby, CV22 5QL (the 'Site'). The Site is located within the administrative boundary of Rugby Borough Council (RBC). The purpose of this report is to support the Regulation 19 Local Plan representation, and to review, assess and validate the landscape and visual elements of the Site with respects to the previous site allocations against the newly proposed planning documents regarding matters of landscape sensitivity therein.

Within the review and assessment of the sensitivity of the Site, it was deemed that the previous assessment of the value and sensitivity (for the 2017 LVIA and LVIA Addendum and the subsequent Landscape and Visual Technical Note, May 2025) was in accordance with the best practice and guidance provided by the Landscape Institute and carried out by professional landscape architects.

It was concluded that the inherent sensitivity of the Site had not changed, and the Land South of Hillmorton, for which the Regulation 18 allocation(May 2025) for c.380 homes had been subsequently omitted for an allocation on three Brownfields Sites and one Green Belt Site. This was primarily navigated through the updated RSVAA study (Dec 2025) commissioned by RBC and produced by Node, superseding the previous, broader valley study commissioned by Warwickshire County Council (WCC) in 2017.

The RSVA 2025 Sensitivity studies conducted provided only large scale, wider judgements and justifications on sensitivities of the RSVA search area, using elements of the landscape baseline and fabric such as Country Parks, Registered Parks and Gardens, and Heritage assets that were not replicated within or in a proximal relationship to the Site itself.

The Site itself does not present any statutory or non-statutory landscape designations, qualities or descriptors of the wider fabric of the RSVAA 2025 assessment study area, and itself is of a small scale with respects to the wider broad tract of the Rainsbrook Valley Landscape of Elevated Sensitivity. The presence of the identified criteria within the assessment does not preclude the Site for development, with notable detractors and broad areas of human influence such as settlements, road infrastructure and human influence throughout the prescribed assessment area.

The basis of the Regulation 19 RBC Local Plan Policy Draft EN3 does not in itself prohibit, limit or determine that the area of the Rainsbrook Valley of Elevated Sensitivity is unsuitable for development; rather, the policy makes note of the consideration of the RSVA 2025 as well as suggesting ways to minimise adverse impacts on the edge of the escarpment.

Therefore, in landscape and visual terms, and in light of the assessment of the sensitivity of the Omission Site within the Draft EN3 Rainsbrook Valley Landscape of Elevated Sensitivity, it would not be considered incongruous to the wider character of the urban settled edge of the settlement of Hillmorton.

1 Introduction

- 1.1 This Landscape Sensitivity Assessment is being submitted on behalf of Persimmon Homes West Midlands (the Applicant) in respect of Land at Barby Lane, Hillmorton, Rugby, CV22 5QL (the 'Site'). The Site is located within the administrative boundary of Rugby Borough Council (RBC). The purpose of this report is to support the Regulation 19 Local Plan representation, and to review, assess and validate the landscape and visual elements of the Site with respects to the previous site allocations against the newly proposed planning documents regarding matters of landscape sensitivity therein.

Scope of the Sensitivity Assessment

- 1.2 This report will provide a concise overview of all the relevant landscape and visual resources associated with the Site. This report will provide a summative review of the 2016 LVIA and subsequent Addendum, the Landscape and Visual Technical Note May 2025, as well as the inherent policies pertinent to landscape and visual matters, in particular the elements of sensitivity and methods of assessment.
- 1.3 This assessment will also set out any key updates in Local Planning Policy (such as the December 2025 Rainsbrook Valley Sensitivity Assessment), in particular the changes between the Regulation 18 allocation of the Land South of Hillmorton and eventual omission for the forthcoming Regulation 19 Local Plan Policies in order to clarify the changes between them within the context of Landscape and visual Sensitivity. This would include a review of (and report of any updates within) national and Local Planning Policy, LVIA Methodology, baseline conditions, and any changes brought about in the landscape and visual assessment through the implementation of the Proposed Development.

2 Project Background

- 2.1.1 An initial outline planning application for development at the Site was submitted by Taylor Wimpy UK Limited to RBC for the development at the Land East of Barby Lane and South Fellows Way, which detailed the following :
- 2.1.2 *'Residential development of up to 113 dwellings including vehicular access from Barby Lane, open space, landscaping, surface water attenuation pond and associated infrastructure (outline planning application to include access with appearance, landscaping, layout and scale reserved).'*
- 2.1.3 Further to this application, a supporting LVIA Addendum (EDP, 2017) was produced to append original application detailing and expanding on aspects of the land in which the Site was proposed being a 'valued landscape', following written consultation feedback from the Landscape Officer at Warwickshire Country Council (WCC).
- 2.1.4 This application was subsequently refused by RBC on the 27 July 2017 (LPA Ref: R16/2490), on the grounds that:
- 2.1.5 *'The proposed development would have a significant and adverse impact on the character and appearance of the landscape in this location. In particular, the proposed dwellings would appear as an intrusive extension of the urban area into the surrounding countryside and would diminish the landscape character of this area. They would further appear visually intrusive and prominent within the landscape to the point of being harmful to the qualities, character and amenity of both the countryside and setting of Hillmorton.'*
- 2.1.6 At a subsequent time, a Landscape and Visual Technical Note drafted in May 2025 by Pegasus Group on behalf of Persimmon Homes West Midlands. This report was produced to assess and review the Site and its readiness for development in light of RBCs 'Housing

and Economic Land Availability Assessment (HELAA, 2025)¹ which identified the areas ‘South of Hillmorton’ as a potential area for broad allocation of housing development. The Landscape and Visual Technical Note also provided a further assessment of the landscape and visual resources within a prescribed extended study area of 5 km in light of the more recent study and update of the Rugby Borough Landscape Character Assessment (2025)² authored by Lepus Consulting, as well as further commentary on the Site and its contribution to the wider character of the setting and its intrinsic value.

Planning Context

- 2.1.7 In accordance with the National Planning Policy Framework (NPPF), Local Planning Authorities are required to review their Local Plans at least every five years to ensure policies remain effective and up to date. This includes maintaining a 5-year housing land supply, which is a demonstrated, deliverable supply of specific housing site to meet needs within a specific area.
- 2.1.8 Regulation 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the consultation process and procedural elements in order to present a final and complete proposed Local Plan that is to be put forward to the Planning Inspectorate for examination. This report provides a summative review and assessment of Landscape matters in support of the Development Framework Plan (DFP).

2.2 Approach

- 2.2.1 An initial review of landscape and visual resources with respects to the Site and its sensitivities will be outlined and detailed based upon a review of the existing assessments, methodologies and applications put forward as noted in Section 4 of this report.
- 2.2.2 Following which, a review of the Landscape Character of the Site, its inherent value, and its contribution to the wider character and setting of the surrounding landscape will be set out in accordance with best practice and guidance of the Guidelines for Landscape and Visual Impact Assessment (GLVIA) Third Edition, 2013.
- 2.2.3 Finally, an assessment and commentary will be provided as to whether the Rainsbrook Valley Landscape Sensitivity Assessment (Node, December 2025)³ and the RSVA designation is applicable to the Site based upon the preceding LVIA assessments, the current and proposed Local Plan Policies relating to landscape and visual matters. A combination of which will, in accordance with best practice and professional judgement, provide summary findings of the landscape sensitivities of Site and its validity for development.

2.3 Assessment Methodology and Guidance

- 2.3.1 The methodology used to undertake this LVIA Addendum and review is based upon the guidance and best practice contained within the following documents:
- Landscape Institute and Institute of Environmental Management and Assessment, *Guidelines for Landscape and Visual Impact Assessment: Third Edition* (2013)
 - Landscape Institute *Technical Guidance Note 02/21: Assessing landscape value outside national designations* (2021).

¹ [RBC Housing and Economic Land Availability Assessment \(HELAA, 2025\)](#)

² [Rugby Borough Council Landscape Character Assessment \(Lepus Consulting, Jan 2025\)](#)

³ [Rainsbrook Valley Landscape and Sensitivity Assessment \(Node, Dec 2025\)](#)

- Landscape Institute *Technical Guidance Note-2024-01: Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3)* (2024).

2.3.2 The methods used to undertake sensitivity assessment of landscape and visual resources within the context of LVIA is detailed and summarised in Section 4 below of this report.

3 Historic Landscape and Planning Information

3.1.1 As noted in Section 3 above, there had been an outline planning application for a Proposed Development on the Site (encompassing up to 113 dwellings) which included an LVIA report and subsequent LVIA Addendum drafted by EDP on behalf of Taylor Wimpy UK Limited in 2017. The following Landscape and Visual Technical Note, drafted by Pegasus Group (May 2025) on behalf of Persimmon Homes West Midlands, expanded upon the viability of the Site and its potential for development with a further assessment of the surrounding Landscape and Visual Resources.

3.1.2 In the interim, RBC sought to update the Local Planning Policy with the Rugby Borough Local Plan (2025-2042), and the Site was earmarked as a Regulation 18 Allocation for c.380 homes (May 2025).

3.1.3 Subsequently, the Site was omitted as RBC had decided to allocate three Brownfield Sites in Rugby as well as one Green Belt Site for housing. Following this, Rainsbrook Valley Landscape Sensitivity Assessment (Node, December 2025) was commissioned and produced which superseded the outgoing, wider Warwickshire County Council (WCC) produced Rainsbrook Valley Landscape Sensitivity Assessment of 2017.

Findings of the 2017 LVIA and ES Addendum

3.1.4 The 2017 LVIA, produced by EDP, reported on the assessment of likely landscape and visual effects during up to and including Year 15 of the Outline Proposed Development detailing the provision for a residential development with associated access, car parking, open spaces and landscape buffers.

3.1.5 Section 1, paragraph 1.6 of the LVIA details the prescribed Study Area applied for the assessment as being up to 5 km, as broad definition of the wider geographical scope of the context of the study. The section goes on to clarify the study area extent whereby the most likely landscape and visual effects as a result of the proposal being predominantly within 3 km of the Site. Paragraph 1.11 illustrates the adopted methodology and processes used to determine the significance of effects on the landscape and visual resource, based primarily on the Guidelines for Landscape and Visual Impact Assessment: Third Edition (GLVIA3).

3.1.6 GLVIA3 (and the subsequent Technical Guidance Notes (TGN) issued by the Landscape Institute) is of particular import as it underpins the principles, processes and presentation elements of Landscape and Visual Impact Assessment, to ensure that practitioners can apply sound, systematic and consistent approaches to assessment with a degree of technical input.

The Site in relation to Landscape Character

3.1.7 The report outlines the Site character and its context using recognised factors and descriptors as set out in the *Guidelines for Landscape and Visual Impact Assessment: Third Edition (GLVIA3) Box 5.1* and *Landscape Institute Technical Guidance Note 02/21: Assessing landscape value outside national designations* (2021) in order to ascertain its intrinsic value based on these criteria.

- 3.1.8 This was achieved using the following elements; Topography and Hydrology, Perceptual and Sensory Character, Landscape Fabric and Habitats, Landscape Designations and Cultural and Historic Aspects (paragraph 2.3). The assessment against these factors leads to a general **Low-Medium** value of the criteria in terms of the Sites inherent value and its contribution to the wider context.
- 3.1.9 Reported factors that lower the site value within the LVIA include its proximal location to the surrounding road infrastructure and built environment affecting the perceived perceptual and sensory character (paragraph 2.10), the natural heritage and features, not noted for its scenic value with a lack of recreational access (paragraph 2.11), and the limited Cultural and Historic associated leading to an assessed **Low** value (paragraph 2.27).
- 3.1.10 A summary within Section 3.16, also notes:
'A review of the site's planning context has found that:
- *The site is situated on the urban edge of Hillmorton and does not lie within, or contain, any nationally or locally designated landscapes. The site does sit in close proximity to any Registered Parks and Gardens within the study area;*
 - *There are no Tree Preservation Orders within or alongside the site boundary;'*

The Site in relation to Landscape Policy

- 3.1.11 Additionally, with respects to landscape policy, it goes on to report:
There are no specific planning policies affecting the site; however, there are a number of general policies seeking to protect and enhance the distinctive local landscape, and integrate development into the landscape (Core Strategy Policies: CS14/15, CS16 and CS17; Saved Policy: GP2; and Draft Policies: HS4, NE3, Ne4, SDC1 and SDC2;' and
'Other policies of the Local Plan that aim to protect landscape and visual amenity and guidance published by RBC concerning its green infrastructure strategy have been noted and the assessment undertaken below has informed the proposed development masterplan which strives to meet their requirements through inherent mitigation.'
- 3.1.12 Which leads toward the concluding statement in paragraph 3.17 that states:
'Notwithstanding the above, there are no statutory or non-statutory landscape designations or adopted landscape policies that preclude development.'
- 3.1.13 Further in the report within the section detailing the interim summary findings under the baseline conditions of the Landscape Resource, paragraph 4.13 details that despite the character of the Site being predominantly productive farmed landscape, is influenced by a variety of urbanising landscape features and built form. This includes elements such as the local road network (Barby Lane connecting to the A428), the proximity of the Site to existing residential development and other features such as the St. Andrew's Rugby Football Club to the west and local schools. It reports that:
'These community/recreational land uses are typically 'suburban' and domestic in character and detract from the tranquil 'rural' qualities of the site. These features have an effect on the site's visual and sensory character, making it less sensitive to further change than would otherwise be the case;...'
- 3.1.14 And also, surmises:
'The site itself is not designated for its landscape value, nor does it form part of any such wider designation, at any level.'

- 3.1.15 In light of the previous reporting and findings noted above with respect to the Site's landscape character, it concludes in paragraphs 4.14 and 4.15 that:

'Overall, the site, albeit containing a number of important features which should be respected as part of any future development proposals, is influenced by its urban fringe location and contains little in the way of particular sensitivity:

- There are no landscape designations covering the site, and the agricultural context is the prevailing character trait; and*
- The moderate sensitivity is considered accurate, although the potential to screen the development proposals given the prevailing topography and woodland cover is very much in favour of development.'*

*'In conclusion and having appraised the above factors it is judged that the site and immediate landscape is of **medium** landscape value.'*

The Site in relation to Visual Amenity

- 3.1.16 With respects to visual amenity, section 5 of the report outlines that along with standard practice of utilising desk-based tools and landform data to inform and feed into a broad Zone of Theoretical Visibility (ZTV). It goes on to further detail and distinguish what it reports as the '*actual Zone of Primary Visibility (ZPV)*' during the surveys and study area appraisal. This is identified as the areas where the proposal would be an '*obvious element of the view*' (paragraph 5.3) and typically in close range and open.
- 3.1.17 Further, distant views are described as being within the scope of the ZTV, whereby less open, partially screened or filtered views would potentially be available. Views of the development would likely be perceptible, however '*would vary and in some cases be almost indistinguishable as a consequence of both increasing distance and visual screening.*'
- 3.1.18 From this, a broad range of visual receptors (i.e. people) are selected and identified to gather Representative Viewpoints for these receptors, as either users of local roads, Public Rights of Way (PRoW), Residents or people engaging in sporting activities. It should be also noted that the report outlines the Representative Viewpoints were consulted with the Council's Landscape Officer to agree the viewpoint locations for the assessment on the 21 October 2016. The proposed representative viewpoints were agreed with the inclusion of one other viewpoint (paragraph 5.12).
- 3.1.19 Within paragraph 5.15, of the '*Interim Summary of Findings*', it is reported that:
'This appraisal has found that the site is visually substantially contained by the adjoining urban edge of Hillmorton to the north with existing two storey residential development adjoining the site to the northern site boundary. Furthermore, views of the site from the east and west are also limited due to a combination of established hedgerows and mature trees and the topography of the area.'
- 3.1.20 The visibility of the Site is reported to as being predominantly limited to receptors within the immediate vicinity and oriented toward the Site. This includes users of PRoW to the south within 1-2 km, Vehicular users of Barby Lane directly adjacent to the Site and the local road network within 1-2 km and a select few residential properties north of the Site.
- 3.1.21 This section concludes with:
'It is acknowledged that other properties to the south of the site may have very limited, filtered, views to the proposals from their properties in winter, but these are very unlikely to be significant and have not been considered further in this report.'

- 3.1.22 Within Section 7, in the Assessment of Effects, It is reported in Paragraph 7.8 with the Site itself that *‘...its character will fundamentally and irreversibly change should the Proposed Development be implemented.’* However, its qualifies the magnitude of change on the Site would be tempered by factors such as limited effects on the physical site elements such as topography and vegetation, the relative containment of the proposals and any proposed residential development being entirely consistent with – in land use terms – with the adjacent residential development and therefore would not result in a change that is wholly inconsistent or incongruous within the wider built form and context.
- 3.1.23 Following this, paragraph 7.9 reports the previously stated value of the site character (being assessed as medium) with a medium susceptibility of change would yield a medium sensitivity, and an eventual moderate adverse effect on the landscape character of the site itself.
- 3.1.24 Paragraph 7.19 summarizes the effects on the landscape resource of the Site and the wider landscape character with the following:
‘Whilst this proposal will certainly yield change to the character of the site itself, this level of effect is not surprising. The conversion of any greenfield site to a residential development site would yield such an outcome, and this is not a reflection on the quality of the scheme layout, but of the process that requires an assumption to be made that most people would see the visual and sensory change from greenfield to development as adverse.’
- 3.1.25 With respect to effects on visual amenity, paragraph 7.34 notes that the site is well visually contained by the surrounding vegetation. It also states that opportunities for views toward the Site are limited from publicly accessible locations due to its visual containment. It should be noted, however, that while development on the Site would yield a change to visual amenity of residential receptors close to the Site in the north, and it itself the very nature of changing the Site character from that of a green field site to a development would result in an adverse effect, the report suggest that:
‘This assessment finds no ‘in principle’ reason why the change of land uses should be found so harmful as to be unacceptable in terms of the effect on visual amenity.’
- 3.1.26 The report’s findings in Section 8, paragraph 8.4 details the conclusions of the preceding assessment highlights that although a Proposed Development may have potential effects on the landscape character of a site, it should not be an obstacle to development.
- 3.1.27 It goes on to explain in paragraph 8.5:
‘All land use change will yield outcomes that some would consider adverse. However, the appropriate test is not whether any adverse effects are generated, but whether these effects would significantly and demonstrably outweigh the benefits, when assessed in the planning balance. In landscape terms, this LVIA process operates on the basis that adverse effects of moderate or greater may be considered a ‘significant effect’ and a material consideration in the determination of the planning application. This assessment has concluded that only three matters give rise to such significant effects:
- *The effect on the landscape character of the site itself; and*
 - *The effect on the visual amenity of residents of the adjacent settlement edge.’*
- 3.1.28 It continues in paragraph 8.6:
‘The level of effect on the landscape character of the site, in light of the change of the land use from agricultural land to residential development, is not unexpected nor is it unusual. Clearly, in terms of any site undergoing this change, the character of the site will fundamentally and irreversibly change. However, with regard to this site, there are no factors in terms of the site’s landscape features, including trees, which preclude the change of use.’

3.1.29 Furthermore, paragraph 8.8 states:

'The low number of significant landscape and visual effects confirm the extent to which sensitive location and layout would mitigate views, retain and reinforce the characteristic landscape fabric and pattern of the site, and assimilate the proposed development into the urban and rural landscape of the site context.'

Paragraph 8.13 also details how the assessment and original proposals comply with the current and available local planning policies as part of the available adopted Local Plan from RBC, and states:

'As a result of the location of the site, and the integrated mitigation, this appraisal finds that the proposals will not introduce land uses or landscape characteristics that are substantially at odds with the baseline landscape character, or that substantially alter the character of the host landscape beyond the site itself. Consequently, the proposed development will integrate with its surroundings. In addition, the site is visually well contained to the north, east and west and the key landscape fabric of the site, the trees and hedgerows at its boundaries will be retained.'

3.1.30 Despite the proposals from this application being at slight variance to the proposals put forward as part of the DFP, the encompassing Site area included within this report is broadly similar and as such the findings within this assessment are still of material importance and value.

The findings of the LVIA Addendum

3.1.31 Following a pre-application submission and meeting, the Addendum report continues to provide further evidence against the rebuttal and feedback raised by WCC's Landscape Officer with respect to the Site and it being a 'valued landscape.' During this meeting, the Landscape Officer suggested that:

'Only a small part of the application site sits within the Land Cover Parcel (LCP) which has an overall moderate sensitivity. The southern boundary of this LCP is defined by a 120m contour. The remainder of the site falls within the adjacent LCP to the south which has an overall sensitivity weighting of high, visibility being the key limiting factor for development on the south facing escarpment slope. I consider the whole of the site that lies within the two LCPs to be a 'valued' landscape for the purposes of paragraph 109 of the NPPF. The part of the site that falls within the LCP of moderate sensitivity is valued because of the same reasons as I have given previously.'

3.1.32 The WCC Landscape Officer continued:

'For a landscape to be 'valued' it must have demonstrable physical attributes and I would argue that the escarpment /southern fringe is of this quality. It is still largely undeveloped, a locally distinctive landform of open character with panoramic views and is a highly visible landscape feature. The escarpment is a local landscape feature which in my opinion is a particularly important example. I have already described that it is largely intact and in a strong condition. It can be viewed from public rights of way and roads / lanes to the south of the settlement.'

3.1.33 It was at this time that the Landscape Officer provided information that an additional landscape sensitivity study had been undertaken by WCC, entitled the 'Rainsbrook Valley Landscape Sensitivity Study' (dated January 2017).

3.1.34 The addendum goes on to stress that the availability of this assessment was not publicly accessible via the LPA's website, nor was it highlighted to the Applicant previously as a material consideration during previous consultations with the LPA, and that '*The Applicant has relied on the study being forwarded by the Case Officer at the LPA*' (paragraph 1.7).

- 3.1.35 At the time of the application and submission, the NPPF as it was (2012) provided the overarching criteria and advice on planning matters with respects to ‘valued landscapes’, which were not defined, with greater weight attached to nationally designated landscapes.
- 3.1.36 Regarding the provision of a ‘valued landscape’ and the provided supplementary ‘Rainsbrook Valley Sensitivity Study’ (January 2017) provided at the time, the addendum provides a clear and concise reasoning, justification and summary for the assessed value of the Site and surrounding land parcels based upon the underlying guiding principles within GLVIA3:
- ‘Guidelines for Landscape and Visual Impact Assessment, version 3. (GLVIA v3), is a key resource for landscape professionals. In general, suitably qualified and experienced landscape professionals should carry out and review landscape and visual impact assessments. GLVIA v3, paragraph 5.26 makes clear that “The fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value”. However, there is no evidence for the application site to be considered a ‘valued landscape’ in the sense of paragraph 109 of the National Planning Policy Framework.’*
- 3.1.37 As noted previously, specifically within GLVIA3, box 5.1 on page 84 identifies eight criteria relevant to judgements about landscape value. The addendum readdresses this aspect by outlining the following:
- ‘Having value’ and being a ‘valued landscape’ are not one and the same. The National Planning Policy Framework does not define ‘valued landscapes’.*
- 3.1.38 The addendum continues to outline the application site:
- ‘...should not receive any elevated status beyond that intrinsic to all countryside, or in this case, open settlement edge (which might adjoin a townscape such as Rugby). EDP finds that the actual intrinsic value of the application site (in a landscape sense) does not preclude development, nor interrupt the presumption in favour of sustainable development.’*

Findings and review of the existing Landscape and Visual Technical Note (May 2025)

- 3.1.39 The Landscape and Visual Technical Note, prepared by Pegasus Group on behalf of Persimmons Homes West Midlands, provided further site analysis, assessment and review of the landscape and visual resources pertaining the Site and its immediate context (Appendix A). The prescribed study area, again being defined as an initial larger extent of 5 km, refined up to approximately 2-3 km, has been offered as the potential boundary whereby the greater landscape and visual impacts would likely occur (paragraphs 3.2 and 3.3).
- 3.1.40 Additional local policy had been produced and issued with respects to housing development and allocation within the Rugby Borough Council administrative boundary, ‘The RBC Housing and Economic Land Availability Assessment (HELAA, 2025)⁴ which identified an area as ‘South of Hillmorton’ as a potential area. The report identified a broad tract of land south of the settlement edge of Hillmorton, up to the rising slopes of the escarpment toward Rainsbrook in the south as being an area that was potentially ‘achievable’ and suitable for residential development.

⁴ [Rugby Borough Housing and Economic Land Availability Assessment 2025](#)

- 3.1.41 This report expressed that the Site had a variance in landscape sensitivity which was lower (medium) further north nearer the settled edge of Rugby, compared to ‘high’ for southern portion of the Site.
- 3.1.42 Following further site surveys and technical analysis of the inherent landscape and ecological factors within the wider tract of land identified, what had originally been identified as ‘Site 146: Land off Barby Lane’, a refined Site area had been identified and redrawn as ‘Site 334’, comprising only the northwest part of the Site, on the lower lying slopes of the land nearest to the existing residential settlement. The technical note also goes on report that the RBC Sustainability Appraisal (2025)⁵ notes that the Site 334 comprises part of a larger promoted Site which could deliver additional infrastructure benefits and could be described as a ‘modest’ urban extension to Rugby.
- 3.1.43 The Note also highlights the sensitive nature of the urban edge of Rugby and the appraisal within report recording the broadly sensitive nature of the sector of land given the wider nature of the relationship between South Rugby / Hillmorton and the nearby Rainsbrook Valley and Oxford Canal to the south.
- 3.1.44 Following this, the *RBC Preferred Options Draft (2025)*⁶ had been published for public consultation which included Site 334 as a draft allocation. The proforma of this draft had recorded Site 334 as being an allocation with potential for 400 dwellings and listing a number of development requirements.
- 3.1.45 The Note also highlights the previous application on the Site (as referenced above in 3.1.4 and 3.4.3, ref. R16/2490) being refused on 27 July 2017, on the basis of the perceived adverse impact on the landscape and visual character of the Site. This refusal however had been prior to the publishing and establishment of the draft provisional review and allocation of the Site within RBC’s further studies conducted (as noted above) as well as the consideration of the Site in the form of the larger Site 146 and refined 334 as part of the *RBC Landscape Sensitivity Assessment of Strategic Site Options (2025)*⁷.

The Site in relation to Local Policy

- 3.1.46 This report noted above is of particular importance, as it identified the Site as part of preparation of the new Rugby Local Plan. The ‘Landscape and Sensitivity Assessment (LSA)’ of the strategic site options would eventually feed into the consultation process for the Rugby Local Plan to provide a defined outlook and assessment of a particular site’s viability for development. The report considered the Sites 146 and 334 as ‘medium’ overall sensitivity, whereas the Rainsbrook 2017 report denoted a ‘high-medium’ sensitivity and ‘high’ sensitivity to housing development across both allocated sites.

The Site in relation to the Landscape Resource

- 3.1.47 Within section 2 of the Note, the landscape baseline, the Site is assessed and reviewed against considered factors such as access and connectivity, topography, vegetation, prescribing it an overall medium value in terms of its intrinsic baseline features.
- 3.1.48 The note also acknowledges that within the character assessment of the Site, it is generally enclosed by the surrounding mature boundary vegetation, with no notable PRow passing through or any attached landscape designations. It also reports that the Site, being located within the urban settlement edge of Hillmorton, presents no particular scenic value in terms of its landscape or any unique and valuable features. Additionally, the Site is also reported as being perceived within the context of both urban and rural characteristics,

⁵ [RBC Sustainability Appraisal 2025](#)

⁶ [RBC Preferred Options Draft 2025](#)

⁷ [RBC Landscape Sensitivity Assessment of Strategic Site Options 2025](#)

being influenced by the proximity of the B4429, surrounding residential areas and varying land uses (such as schools and recreational grounds).

- 3.1.49 The criteria within the note used to consider landscape value have been identified are indicative of the criteria provided in the supporting Technical Guidance Note as noted above in section 3.3, *Landscape Institute Technical Guidance Note 02/21: Assessing landscape value outside national designations (2021)*.
- 3.1.50 The note summarises that the proposed ‘valued landscape’ put forward as part of the Rainsbrook Sensitivity Assessment (January 2017) would demonstrate the presence of a number of key indicators of landscape value as set out within TGN 02/21, paragraph 2.4.4, Table 1. The TGN is also set out to be complementary to Box 5.1 within GLVIA3 and not intended to be an exhaustive list of factors but a range of elements that could be considered.
- 3.1.51 The note goes on to state:
*‘On balance, the Site is **not** considered to be a valued landscape in accordance with Paragraph 187(a) of the NPPF.’*
- 3.1.52 The summary of the Site and its potential and capacity for residential development is outlined within the note as:
‘On balance, it is judged that the well-enclosed nature of the Site offers the capacity to accommodate residential development of type proposed (circa 380 dwellings). Higher density development should be introduced within the northern part of the Site and sensitively integrated with existing residential development at Hillmorton. Ideally, densities should reduce in the southern parts of the Site with dwellings facing onto an area of POS creating a landscape buffer with the Rains Brook Valley.’

The Site in relation to the Visual Resource

- 3.1.53 The visual baseline of the Note reflects the scope and study area as presented within the previous planning application (ref. R16/2490) and presenting a range of visual receptors including such as local residents, users of local roads, and users of the surrounding PRoW network.
- 3.1.54 The visual envelope is described as being ‘relatively limited’ with ‘no longer-range panoramic views’ toward the site being identified. It goes on to report that the Site is well visually contained by the surrounding urban edge of Hillmorton in the north, with views east and west also limited due to a combination of intervening vegetation and topography. Few if any receptors were identified as being affected. Close range receptors in the immediate context of the site (1-2 km), such as high sensitivity PRoW users and residents in the north were reported as being offered potential filtered, screened views of the Site.
- 3.1.55 The Note also reported that the sensitivity of the Site increases further south with an overall medium sensitivity. The conclusion also suggests the potential of higher density development at the Site along and close to the settled urban fringe of Rugby at Hillmorton. This area had been identified as being more suitable for residential development. The final suggestion offered in the note reports that reduced development densities could also in the southern parts of the Site, and through careful allocation of landscape buffers and POS toward the Rains Brook Valley, provide a more nuanced approach to the particular sensitivities of the escarpment.

4 Assessment and review of Landscape Sensitivity

Methodology

- 4.1 As noted earlier in this report, the guidance and technical documentation that underpins LVIA assessment conducted by landscape practitioners and professionals includes published guidance by the Landscape Institute as set out above in section 3.3. The methodology for assessing sensitivity of a landscape and visual resource based upon this guidance is expressed below.

Sensitivity

- 4.2 Sensitivity is judged taking into account the component judgments about the value and susceptibility of the receptor.

Sensitivity of landscape receptors

- 4.3 The sensitivity of a landscape receptor is a combination of “*judgements of their susceptibility to the type of change or development proposed and the value attached to the landscape*” (GLVIA3, para 5.39). For the purposes of this assessment, susceptibility and value of landscape receptors are defined as follows:

- Landscape susceptibility: “*the ability of the landscape receptor (whether it be the overall character or quality/condition of a particular landscape type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed change without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies*” (GLVIA3, para 5.40).
- Value of the landscape receptor: “*The value of the Landscape Character Types or Areas that may be affected, based on review of designations at both national and local levels, and, where there are no designations, judgements based on criteria that can be used to establish landscape value; and, the value of individual contributors to landscape character, especially the key characteristics, which may include individual elements of the landscape, particularly landscape features, notable aesthetic, perceptual or experiential qualities, and combinations of these contributors*” (GLVIA3, para 5.44).

- 4.4 The sensitivity of landscape receptors is defined as high, medium, or low based on professional interpretation, combining judgements of their value attached to the landscape and susceptibility to the type of change or development proposed.
- 4.5 Landscape receptors include the different landscape character types or areas which may be affected by the Proposed Development, as well as landscape designations within the LVIA Study Area.

Landscape value

- 4.6 The value attached to landscape receptors (both landscape fabric and landscape character) is reflected by landscape designations and the level of importance which they signify. *However, landscape designations are not the sole indicator of landscape value* (paragraph 5.26, GLVIA3).
- 4.7 With reference to the Landscape Institute Technical Guidance Note 02/21 ‘Assessing landscape value outside national designations’, the following range of factors (not exclusive) are also considered to identify the value of the landscape:

- landscape quality /condition;
- perceptual/scenic quality;
- rarity/representativeness/ distinctiveness;
- conservation interest;
- aesthetic/perceptual aspects;
- recreational value; and
- cultural associations.

4.8 Table A.1 provides an example of how these factors (not exclusive) are considered in a scale of High, Medium, Low.

Table A1: Landscape value

Landscape	High	Medium	Low
Quality	Higher quality landscapes with consistent, intact and well-defined, distinctive attributes.		Lower quality landscapes with indistinct elements or features that detract from its inherent attributes.
Scenic quality	Aesthetic/scenic or perceptual aspects or features that contribute to landscape character.		Limited variety or distinctiveness.
Rarity	Rare or unique landscape character type/ unit, features or elements.		Common or unremarkable landscape character type/unit, features or elements.
Conservation interest	A strong sense of place with low potential for substitution.		Ordinary landscape with high potential for substitution.
Cultural associations	Landscape with strong cultural associations that contributes to its quality.		Landscape with few cultural associations.

4.9 Landscape value is the ‘inherent’ component’, which is independent of the development proposal, while the other component, susceptibility, is development specific.

Landscape susceptibility

4.10 Susceptibility indicates the ability of a landscape to accommodate the Proposed Development ‘without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies’ (LI and IEMA, 2013).

4.11 Susceptibility of landscape fabric/elements to direct change is defined as high, medium, or low based on an interpretation of a combination of parameters including:

- contribution of the landscape element which would be removed/affected to the key characteristics of the surrounding landscape; and
- extent to which the landscape element which would be removed/affected can be replaced.

4.12 Some landscape receptors are better able to accommodate development than others due to certain characteristics that are indicative of capacity to accommodate change.

4.13 Susceptibility of landscape character to change is defined as:

- High – with Low ability to accommodate the specific proposed change,
- Medium - with Moderate ability to accommodate the specific proposed change, or
- Low – with High ability to accommodate the specific proposed change.

4.14 Susceptibility of landscape character to change is dependent on an interpretation of a combination of parameters including:

- Scale and pattern of the landscape and its elements/features;
- Simplicity or complexity of the landscape;
- Landscape pattern and focus/the nature of skylines;
- Landscape quality or condition;
- Existing land use;
- Visual enclosure/openness or exposure;
- Tranquillity/ remoteness/ wilderness; and,
- Scope for mitigation, which would be in character with the existing landscape.

4.15 Table A.2 provides an example of how these parameters (not exclusive) are considered in a scale of High, Medium, Low.

Table A.2: Landscape Susceptibility

Landscape	High ←	Medium	→ Low
Scale	A landscape of a large enough scale to accommodate the development.		A smaller scale landscape, with complex, distinctive or small-scale.
Simplicity or complexity	Aesthetic/scenic or perceptual aspects of designated wildlife, ecological or cultural heritage features that contribute to landscape character		Limited wildlife, ecological or cultural heritage features, or limited contribution to landscape character.
Skyline	Distinctive undeveloped skylines with landmark features.		Developed, non-distinctive skylines without landmark features.
Quality	Higher quality landscapes with consistent, intact and well-defined, distinctive attributes.		Lower quality landscapes with indistinct elements or features that detract from its inherent attributes.
Existing land use	Untouched natural landscapes, with cultural heritage, recreational features		Landscape with infrastructure, industrial elements, commercial forestry, brown fields.
Openness/ enclosure	Intimate smaller scale landscapes, can be more complex.		Open landscape with large scale and simple landform.

4.16 An overall sensitivity assessment of the landscape receptor is made by combining the assessment of the value of the landscape character receptor and its susceptibility to change. The basis for the assessments will be made clear using evidence and professional judgement in the evaluation of sensitivity for each receptor.

Sensitivity of visual receptors

4.17 Visual receptors are always people. The sensitivity of each visual receptor (the person or group of people likely to be affected at a specific viewpoint) *“should be assessed in terms of both their susceptibility to change and in views and visual amenity and also the value attached to particular views”* (GLVIA3, para 6.31). For this assessment, susceptibility and value of visual receptors are defined as follows:

- Visual susceptibility: *“The susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of: The occupation or activity of people experiencing views at the particular locations; and the extent to which their attention or*

interest may therefore be focused on the views and the visual amenity they experience at particular locations” (GLVIA3, para 6.32).

- Value of views: Judgements made about the value of views should take account of: *“recognition of the value attached to particular views, for example in relation to heritage assets, or through planning designations; and, indicators of value attached to views by visitors, for example through appearances in guidebooks or on tourist maps, provision of facilities for their enjoyment (such as parking places, sign boards or interpretive material) and references to them in literature or art...” (GLVIA3, para 6.37).*

4.18 Sensitivity is not readily graded in bands and GLVIA3 notes, with regards to visual sensitivity, that the division of who may or may not be sensitive to a particular change *“in reality, there will be a gradation in susceptibility to change” (GLVIA3, para 6.35).* To provide both consistency and transparency to the assessment process, however, Table A3, below defines the criteria which have guided the judgement as to the intrinsic susceptibility and value of the resource/receptor and subsequent sensitivity to the type of development proposed.

4.19 For visual receptors susceptibility and value are closely linked - the most valued views are also likely to be those where viewer’s expectations will be highest.

Table A3: Definitions of visual sensitivity

Sensitivity	Typical descriptors	
	Visual receptor susceptibility	Value of view
High	Residents at home; users of outdoor recreational facilities including strategic recreational footpaths, cycle routes or rights of way, whose attention may be focused on the landscape; visitors to heritage assets, important landscape features with physical, cultural, or historic attributes; beauty spots or picnic areas.	The value of public views, which is the focus of GLVIA3, is identified as national, regional or community and will vary depending on the nature, location and context of the view and the recognised importance of the view. Considerations include cultural associations; designation or policy protection; views of or from landmarks; and/or the scenic quality of the view. The value attributed relates to the value of the view, e.g. a National Trail is nationally valued for access, but not always for the available views from every section.
Medium	Travellers on road, rail, or other transport routes. Users of public open space and footpaths where the nature of the surroundings is not a significant factor in the enjoyment of the activity. Visitors to landscape and heritage resources and other attractions where views of the surroundings are a minor contributor to appreciation, experience, and/or enjoyment.	
Low	Users of high-speed roads and passengers in trains running at high speed. People engaged in outdoor sports or recreation (other than appreciation of the landscape), commercial buildings, and other locations where people’s attention may be focused on their work or activity, not on their surroundings, and where the setting is not important to the quality of working life.	

4.20 Combining susceptibility to change and value attached to the view seems in practice to lower the visual sensitivity of receptors where the proposals do not align with the main direction of view. Therefore, there is potential for double counting this with the assessment of magnitude of change, which is also affected by direction of view. Therefore, this methodology places more emphasis on the nature and activity of the visual receptor, with residents / recreational receptors, all being high sensitivity to the type of development proposed.

4.21 Although intermediate ratings are avoided, in cases where intermediate ratings are given, e.g., ‘medium-low’, then this indicates an effect that is both less than medium and more than low, rather than one which varies across the range.

4.2 Landscape Sensitivity review

- 4.1 In the interim of the production of the Landscape and Visual Technical Guidance Note by Pegasus in May 2025, the Allocated Site identified within the documents reviewed and assessed as part of the consultation draft for the emerging Local Plan have been omitted from the subsequent final submission draft for the regulation 19 representation. The following sensitivity review and sections aim to understand the newly revised and allocated sensitivity of the Omitted Site, its context based on existing factors of sensitivity, and if there is any further justification on the reported increased levels of sensitivity within the RVSA 2025.
- 4.2 The following test of the assessment of the landscape sensitivity of the Site and its immediate context is drawn upon the published guidance as noted above in section 5.3.
- 4.3 The sensitivity of a landscape to a development varies according to the nature of the existing resource and the nature of the development itself. Typically, within an LVIA, the landscape character is described and judgements made as to the value, condition and quality of the Site and its immediate surroundings. To enable a judgement to be made about the relative sensitivity of a landscape to a particular type of development, considerations of landscape value, integrity and capacity are relevant and inform the landscapes susceptibility to the change proposed.
- 4.4 The DFP options taken forward as part of the Rugby Local Plan Regulation 19 Consultation response (Figures 3 and 4) illustrate two potential options for the development of the Land within the Site and the encompassing landscape buffers, mitigation, screening and POS that could be incorporated.
- 4.5 Following on from the landscape baseline elements as described within section 2 of the Landscape and Visual Technical Guidance Note (Appendix A), the elements that have been identified can be determined to test the character of the landscape, its elements and features and aesthetic or perceptual factors that contribute to the Site's character.
- 4.6 Using the prescribed methodology noted above, the Site and its constituent landscape value have been assessed using the following criteria.

Landscape value of the site

- 4.7 Landscape value is assessed at the site level on the Landscape Character Area (LCA) affected directly and for the wider landscape of the Study Area as a whole, taking into consideration the Site's contribution to the overall character and its value.
- 4.8 The factors below are used to assess the value of the Site and its context noting the contributing factors as noted above in 3.3, as derived from the Landscape Institute's Technical Guidance Note 02/21: Assessing landscape value outside national designations (26th May 2021) (TGN).
- 4.9 **Landscape Condition:** The Site is of good physical condition with an absence of detracting features, with the presence of mature boundary vegetation and trees, and therefore is of medium value.
- 4.10 **Scenic Quality:** The Site offers limited scenic qualities due to the notable detracting elements within the landscape such as the local road network and infrastructure, surrounding urban outlook and presence of residential properties and presents commonplace landscape elements. Therefore, it is of medium value.
- 4.11 **Distinctiveness:** The landscape of the Site does not present any distinctive features or provide any additional contribution to the character or identity in its present form and

presents common agricultural features of the surrounding area. Therefore, it is of medium value.

- 4.12 **Conservation interests:** The Site does not possess any immediate conservation designations or interests. Therefore, is of low value.
- 4.13 **Recreational Value:** No public footpaths are present within the Site, with the nearest situated to the northern boundary of the Site. Therefore, the recreation value is considered to be low.
- 4.14 **Perceptual Aspects:** Both wildness and tranquillity are perceptual aspects of the landscape. The Site is situated at the urban fringe of the Wider Settlement of Rugby to the South. The presence of the M45 Motorway to the south as well as the wider human influence in the north are large detracting elements with respects to perceptual aspects of the Site. Therefore, it is of medium to low value.
- 4.15 **Associations:** There are no cultural associations linked to the Site and so is of low value.
- 4.16 **Landscape Function:** The Site performs a limited landscape function as an area of predominantly agricultural land, with some contribution present in the periphery such as associated hydrological systems ponds and boundary trees and vegetation that contribute to the wider Green Infrastructure. Therefore, it is of medium value.
- 4.17 Overall, the landscape value of the Site is judged to be **Medium**.

Landscape Susceptibility and Sensitivity

- 4.18 The Application Site area is deemed to be of Medium value, as derived from the Landscape Value section above. The land use land landscape pattern of the Site consists of medium to large scale open agricultural fields. The topography of the landscape within the site sits within the wider escarpment slopes that form the valley sides at Rainsbrook, rising to an AOD of approximately 120 m near the settled edge of Hillmorton, and descending to approximately 95 m AOD toward Rainsbrook in the south. However, the allocated Site area to the north features limited variation in topography and therefore is of low susceptibility. The Site lacks distinct landscape features and is enclosed by boundary vegetation to the west and east. However, numerous mature boundary trees and hedgerows are present on some of the internal field patterns within the Site. Therefore, the susceptibility of the field pattern and vegetation is deemed to be medium. The perceptual aspects of the landscape such as tranquillity are of negligible susceptibility to development at the Site as it is adjacent to the current wider urban character and settlement of Rugby, and within the influence of the surrounding road network and transport corridors. Overall, the landscape character of the Site is considered of **Medium-Low** susceptibility to Residential Development.
- 4.19 A combined **Medium** value and **Medium-Low** susceptibility results in a **Medium to Low** landscape sensitivity of the Site.
- 4.20 As reported in the Landscape and Visual Guidance Technical Note by Pegasus, the development aims of the Site can be bolstered by minimising the extent of proposal and thus the potential landscape effects within the immediate context and scope of the existing urban settled fringe of Hillmorton. The surrounding residential areas situated to the north along the plateau of the escarpment would help to further encapsulate any proposed residential development within the Site in the north.

RVSA Designation and context

- 4.21 The Rainsbrook Valley Sensitivity Assessment (Node, December 2025) was commissioned by RBC and supersedes the previous Landscape Sensitivity Assessment in

the valley in 2017. This assessment also forms the basis of the revised Rugby Borough Local Plan 2025 -2042, as part of the Regulation 19 Local Plan Representation.

- 4.22 This assessment directly filters into the Draft Policy EN3: Rainsbrook Valley Landscape of Elevated Sensitivity, and the proposed policy map, Figure 2. The justification for this policy, which encompasses the Site and a broad tract across the land immediately south of Rugby, is determined by the factors illustrated within the policy and makes reference to the assessment and findings of the RSVa (2025). The following derived criteria noted from this policy:

‘EN3 Rainsbrook Valley landscape of elevated sensitivity

A. Within the Rainsbrook Valley landscape of elevated sensitivity as defined on the policies map, development shall comply with paragraphs B to E of this policy.

B. Protect, reinforce and where possible enhance the landscape character taking into consideration the following landscape factors: natural heritage

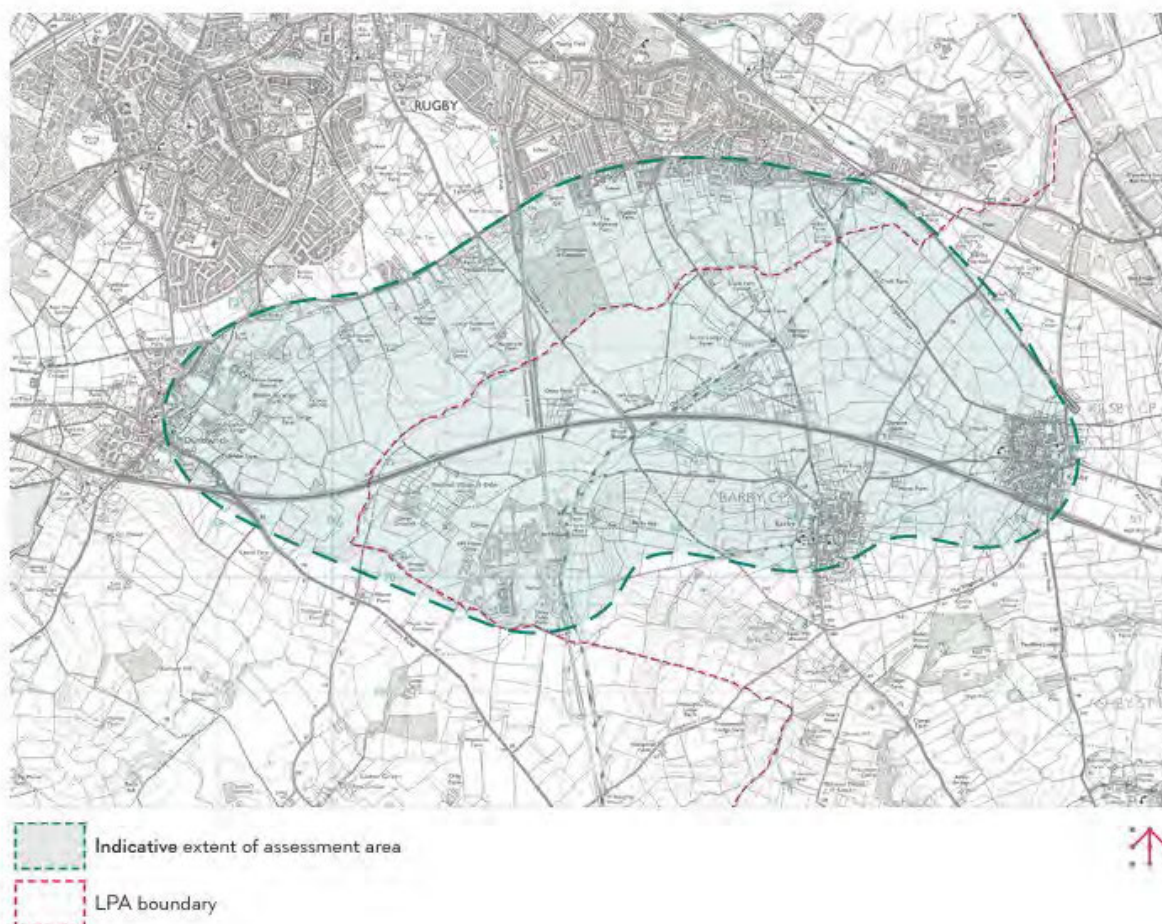
- I. cultural heritage*
- II. landscape condition*
- III. associations*
- IV. distinctiveness*
- V. recreational value*
- VI. perceptual scenic and tranquillity qualities*
- VII. functional landscape qualities*

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.’

The criteria noted within the policy have been functionally derived from the RSVa 2025, which in turn is a direct correlation of Box 5.1 in GLVIA3 and the TGN 02/21.

- 4.23 The RSVA 2025 provides a broad, large-scale assessment of the Rainsbrook Valley as a whole, which extends beyond the LPA boundary to the south, into West Northamptonshire, and reaches further west and northwest near the settlement of Dunchurch.



- 4.24 The identified sensitive area does not preclude development, and it encompasses a variety of built form and landscape elements featured throughout the area. The large assessment area includes various settlements of different sizes, villages, major roads and infrastructure such as the M45 motorway (which bisects the assessment area east to west), as well as areas of industry, human influence and the like which are deemed less sensitive.

Diagram 1: Extract from the RSVA 2025 illustrating the wider assessed area of the Rainsbrook Valley.

Sensitivity Assessment and comparative Local Plan Policy Review

- 4.25 The assessment of the Rainsbrook Valley within the RSVA 2025 report derives the methodology, approach and assessment from the published guidelines produced by the Landscape Institute, as noted within this report in section 3.3.
- 4.26 As shown in Diagram 1, the broad assessment area used to determine the overall sensitivity of the RSVA 2025 encompasses features such as Registered Parks and Gardens, PRoWs, Heritage assets, Country Parks and Local Wildlife Sites.
- 4.27 The Omission Site in relation to the scale of the assessment area is small and does not contain any designated or non-designated landscape elements or features as described

within the wider assessment area. The RSVA 2025 assessment also provides a summary of the criteria applied to the area as whole when assessing landscape value, which includes elements such as natural heritage, cultural heritage, condition, distinctiveness, recreational elements and perceptual characteristics.

- 4.28 A majority of the factors noted above encompass ‘moderate’ to ‘weak’ landscape value, with only cultural heritage and recreational value being deemed as greater than moderate. Again, these factors are applied and are accounted for across the broad spectrum of the study area and correspond in general terms with the previously assessed value tables and descriptors for the Site itself in the previous 2017 LVIA and Addendum, the Landscape and Visual Technical Note and the assessment of value within this report. The summary of the value applied as being noted ‘good’ and elevated above ‘ordinary’ therefore is only representative of the wider assessment area and does not consider the factors at the granular level within the Site itself.
- 4.29 It does not however, and cannot, provide a position on the inherent factors of susceptibility of the Omission Site as it is closely linked to the baseline context of the character of the Site itself, as well as the specifics of the type of development proposed.
- 4.30 The RSVA 2025 report therefore can only provide a commentary on the susceptibility of the Rainsbrook Valley and the overall sensitivity. The report does however explain that the lower valley slopes are of a greater susceptibility and therefore more sensitive to development, which also correlates with the findings of the Landscape and Visual Technical Note.
- 4.31 The aspects of sensitivity, as derived from the inherent value and susceptibility of the landscape of the Omission Site have therefore not changed from the previous application in 2017, or with the subsequent assessment conducted by Pegasus.
- 4.32 The Policy EN3: Rainsbrook Valley Landscape of Elevated Sensitivity, which is derived from RVSA 2025, does not itself prohibit development within the policy area. It states in part C that important views should be safeguarded, in order to ‘*minimise adverse visual impacts on the edge of the escarpment.*’
- 4.33 It also goes on to state that the findings of the RSVA 2025 and justification within afford a ‘*higher degree of consideration*’ when considering development within the area. Therefore, by omitting the Site from the previous allocation, RBC contravenes the policy by prohibiting development when the intrinsic landscape elements and features within the Site and its subsequent sensitivity has not changed since the previous application.

Emerging Policy: National Planning Policy Framework (NPPF) 2025

- 4.34 The consultation draft NPPF (December 2025), which in its current form provides further detail and guidance within Section 4: Achieving Sustainable Development, outlines various policies and objectives that aim to meet development needs and suitable land for settlement growth. Policy S5 determines the principle of development outside of settlements. Part 1, paragraph J. i also notes that:

‘Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test), and where the development would:

i. be well related to an existing settlement²⁹ (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure;...’

The policy also goes on to state in part 2 that:

'In applying this policy, the circumstances in which the benefits of approving development proposals are likely to be substantially outweighed by adverse effects include, but are not restricted to, situations where the development proposal would fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.' And part 4:

- 4.35 *'Any other development proposals which do not fall within one of the categories set out*
- 4.36 *above should only be approved in exceptional circumstances, where the benefits of the proposal would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement.'*
- 4.37 The unmet need for housing within the RBC could provide further justification for the Site and its original allocation could be attributed to a variety of factors, such as a proportion of the Site allocation for affordable housing, retirement homes and social housing.

5 Conclusions

- 5.1 Within the review and assessment of the sensitivity of the Site, it was deemed that the previous assessment of the value and sensitivity (for the 2017 LVIA and LVIA Addendum and the subsequent Landscape and Visual Technical Note, May 2025) was in accordance with the best practice and guidance provided by the Landscape Institute, GLVIA3. The supplementary Landscape Institute TGN 02/21: Assessing landscape value outside national designations (2021), and Landscape Institute TGN-2024-01: Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) (2024) also provided further support and background information for the previous and current site assessment reviews conducted as part of this report.
- 5.2 It was concluded that the inherent sensitivity of the Site had not changed, and the criteria used to make this judgement and the justifications had been supported and correlated with the individual professional judgement of a professional landscape architect applied in each case.
- 5.3 The RSVA Sensitivity studies conducted provided only large scale, wider judgements and justifications on sensitivities of the RSVA search area, using elements of the landscape baseline and fabric such as Country Parks, Registered Parks and Gardens, and Heritage assets that were not replicated within or in a proximal relationship to the Site itself.
- 5.4 Subsequently, the Omission of the Site as an Allocated Site for development during the initial stages of the incumbent RBC Local Plan had not been justified or reasoned prior to the production of the RSVA 2025 updated assessment. The basis of the RBC Local Plan Policy EN3 does not in itself prohibit, limit or determine that the area of the Rainsbrook Valley of Elevated Sensitivity is unsuitable for development; rather, the policy makes note of the consideration of the RSVA 2025 as well as suggesting ways to minimise adverse impacts on the edge of the escarpment.
- 5.5 Therefore, in landscape and visual terms, and in light of the assessment of the sensitivity of the Omission Site within the EN3 Rainsbrook Valley Landscape of Elevated Sensitivity, it would not be considered incongruous to the wider character of the urban settled edge of the settlement of Hillmorton.
- 5.6 A careful and considered approach in landscape design and mitigation, as well as a development proposed that would be confined to and situated within the upper slopes and land parcels closest to the existing settlement edge and residential buildings could be more easily assimilated within the surrounding character. Additional landscape buffers, POS and screening vegetation could also be offered further south, along the lower lying valley slopes, helping to embed and integrate a residential development in the context of the surrounding green infrastructure network.

6 References

Publications

Landscape Institute, 2019, *Technical Guidance Note 06/19 Visual Representation of Development Proposals*.

Landscape Institute, 2024, *Technical Guidance Note – 2024-01: Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment: Third edition (GLVIA3)*.

Landscape Institute and Institute of Environmental Management and Assessment, 2013, *Guidelines for Landscape and Visual Impact Assessment: Third Edition*.

Ministry of Housing Communities and Local Government, December 2025, *National Planning Policy Framework*.

Rugby Borough Council Local Plan 2011-2031 (Adopted June 2019)

Rugby Borough Local Plan 2025 – 2042 Proposed Submission Version January 2026

Sustainability Appraisal (SA) of the Rugby Borough Local Plan – December 2025

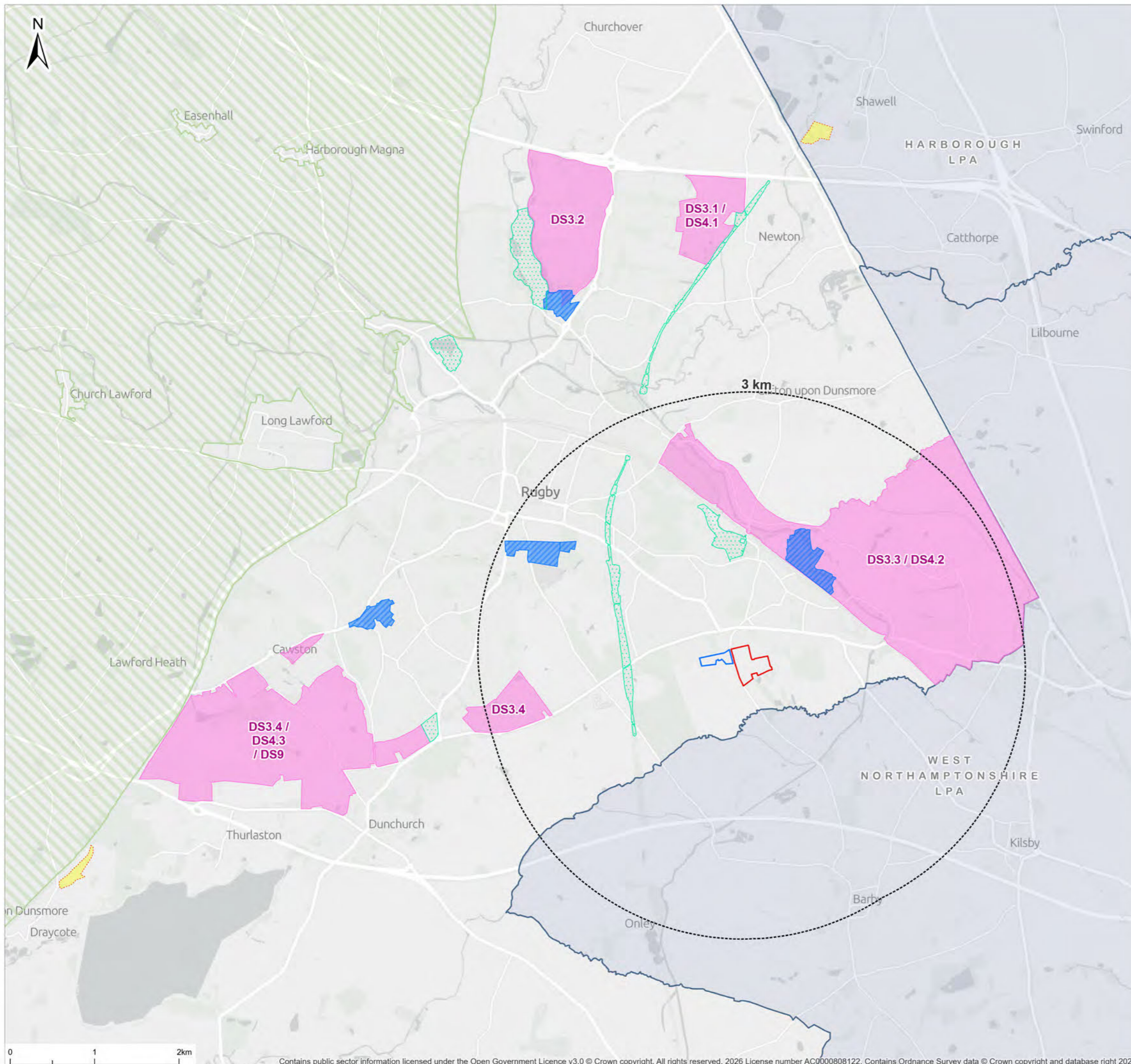
Figures

Figure 1 : Adopted Rugby Borough Local Plan 2011-2031 Policies Map

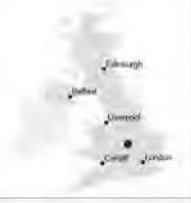
Figure 2 : Regulation 19 – Local Plan Policies Map

Figure 3 : Development Framework Plan DRWG P25-1170_DE_002_01E

Figure 4 : Development Framework Plan DRWG P25-1170_DE_002_01F



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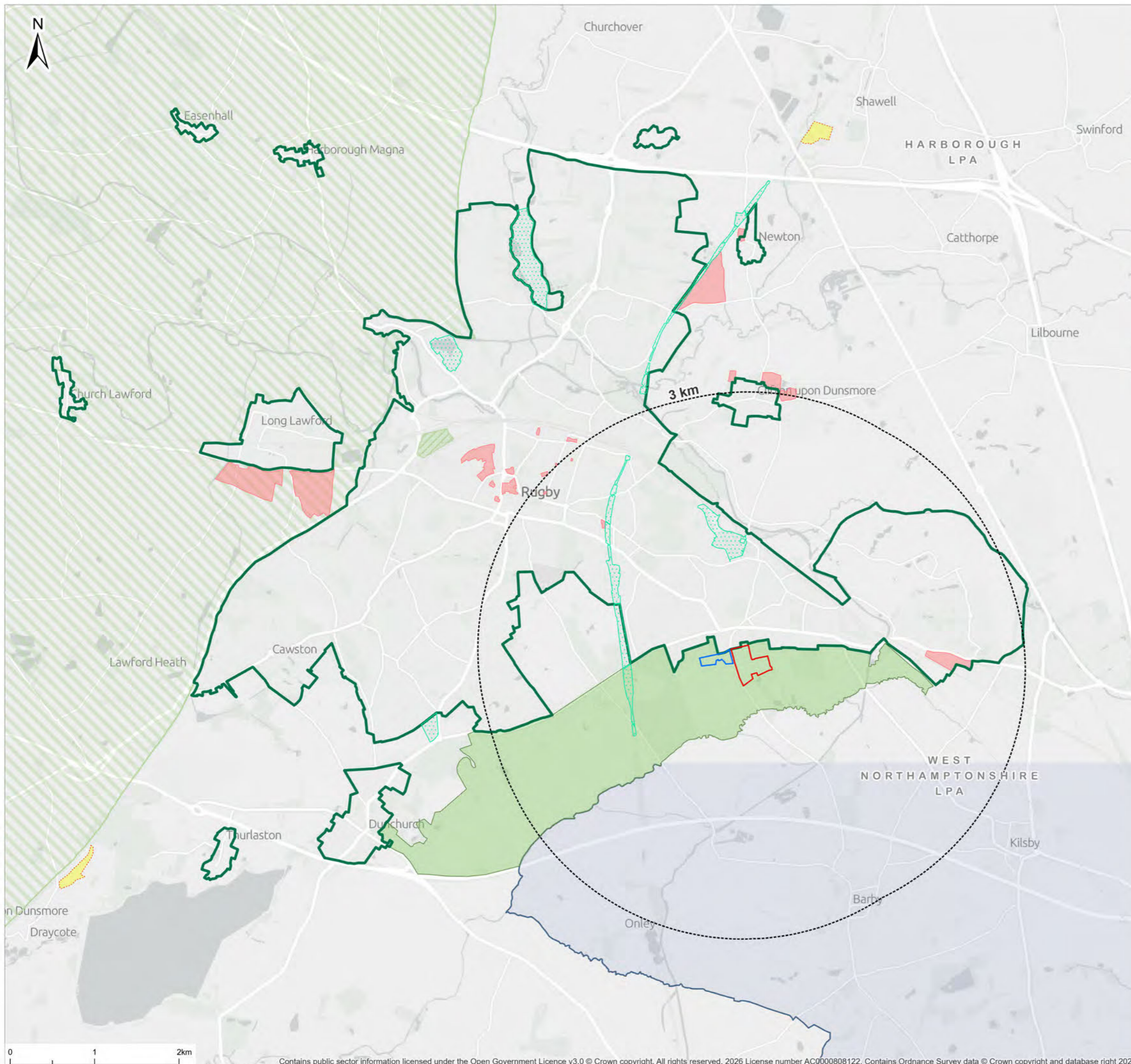


- LEGEND**
- Site Boundary
 - Land being promoted by Catesby Estates
 - 3 km Study Area
 - Rugby Borough Boundary
 - Allocated Site
 - Conservation Area
 - Green Belt
 - Local Nature Reserve
 - Site of Special Scientific Interest



Client	Persimmons Homes West Midlands		
Project	Land east of Barby Lane, Hillmorton, Rugby		
Project No.	794-PLN-LAN-5615		
Title	Adopted Rugby Borough Local Plan 2011-2031 Policies Map		
Drawing No.	Figure No.	Revision	Status
Rugby	01	01	FINAL
Date	Drawn By	Checked By	Revision By
MAR 2026	AC	AI	-
Scale @ A3 1:45,000		Datum OSGB 1936	

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- LEGEND**
- Site Boundary
 - Land being promoted by Catesby Estates
 - 3 km Study Area
 - Rugby Borough Boundary
 - Local Green Space
 - Rainsbrook Valley landscape of Elevated Sensitivity
 - Residential Allocations
 - Settlement Boundaries
 - Green Belt
 - Local Nature Reserve
 - Site of Special Scientific Interest



Client	Persimmons Homes West Midlands		
Project	Land east of Barby Lane, Hillmorton, Rugby		
Project No.	794-PLN-LAN-5615		
Title	Regulation 19 - Local Plan Policies Map		
Drawing No. Rugby	Figure No. 02	Revision 01	Status FINAL
Date MAR 2026	Drawn By AC	Checked By AI	Revision By -
Scale @ A3 1:45,000		Datum OSGB 1936	

C:\WFH\Rugby\Rugby.aprx - Rugby Fig2

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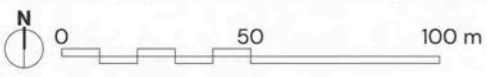
- ### KEY
- SITE BOUNDARY
 - SITE ACCESS VIA BARBY LANE
 - RESIDENTIAL DEVELOPMENT UP TO 170 DWELLINGS
 - SCHOOL EXTENSION LAND 0.5 HECTARES
 - PUBLIC OPEN SPACE (inc suds) 4.34 HECTARES - 44% OF TOTAL REDLINE AREA
 - TREE LINED PRIMARY STREET
 - TREE LINED SECONDARY STREET
 - TREE LINED TERTIARY STREETS
 - FOCAL SPACES
 - PRIVATE LANES
 - ACTIVE TRAVEL ROUTES
 - EXISTING TREES
 - NEW STRUCTURAL PLANTING
 - NEW BUFFER PLANTING
 - NEW TREE PLANTING
 - COMMUNITY ORCHARD
 - LOCALLY EQUIPPED AREA FOR PLAY (LEAP)
 - LOCAL AREA OF PLAY (LAP)
 - INFORMAL KICK ABOUT SPACE
 - PLAY ON THE WAY TRAIL LOCATIONS
 - POTENTIAL GREAT CRESTED NEWTS PRESENT WITH 50M OFFSET
 - SUSTAINABLE DRAINAGE
 - EXISTING BODIES OF WATER
 - EXISTING PUBLIC RIGHTS OF WAY
 - POTENTIAL CYCLE AND PEDESTRIAN CONNECTION
 - 5M CONTOURS

- ### KEY PRINCIPLES
1. PRIMARY ACCESS POINTS VIA BARBY LANE;
 2. PRIMARY VEHICULAR MOVEMENT WITH INTEGRATED TREE PLANTING AND GRASS VERGES;
 3. SECONDARY STREETS RUN WEST TO EAST, INCORPORATING TREE PLANTING, GRASS VERGES AND RESPOND TO THE SITE'S TOPOGRAPHY;
 4. KEY ACTIVE TRAVEL ROUTES PROVIDING A FULLY CIRCULATORY MOVEMENT INFRASTRUCTURE;
 5. PROPOSED MARTYRS COMMON AND MOAT COMMON PROVIDING EQUIPPED AREA OF PLAY;
 6. SERIES OF THEMED GREENS PROVIDING INFORMAL PLAY AND RECREATION;
 7. COMMUNITY USE SPACES IN THE FORM OF COMMUNITY ORCHARD;
 8. MAXIMUM RETENTION OF EXISTING TREES AND HEDGEROWS ON SITE, FORMING GREEN CORRIDORS AND WALKING ROUTES;
 9. PROPOSED NATIVE LANDSCAPE BUFFER ALONG THE SOUTHERN BOUNDARY OF THE SITE ;
 10. EXISTING VEGETATION ALONG THE WESTERN BOUNDARY ENHANCED WITH PROPOSED NATIVE PLANTING, AND THE DEVELOPMENT ENVELOPE IS SET BACK FROM BARBY LANE TO CREATE A GREEN CORRIDOR;
 11. ADDITIONAL TREE/HEDGEROW PLANTING ALONG THE NORTHERN BOUNDARY TO 'GAP UP' EXISTING HEDGEROW IN PLACES AND HELP TO PROTECT THE PRIVACY OF THE EXISTING ADJACENT PROPERTY;
 12. POTENTIAL PEDESTRIAN AND CYCLE CONNECTIONS TO SURROUNDING CONTEXT;
 13. MAXIMUM OUTWARD FACING DEVELOPMENT OVER NEWLY CREATED PUBLIC OPEN SPACE;
 14. POTENTIAL CYCLE AND PEDESTRIAN CONNECTION TO THE HIGH STREET AND FLORIN PLACE
 15. PROPOSED MARTYRS PARKLAND PROVIDING WALKING ROUTES AND PUBLIC OPEN SPACE FOR RECREATION AND LEISURE
 16. THE EXISTING ON-SITE DRAINAGE POND WILL BE RETAINED AND INTEGRATED INTO THE PROPOSED DRAINAGE STRATEGY FOR THE DEVELOPMENT

Rugby Borough Council - Open Space, Playing Pitch and Sports Facilities Study
November 2015

TYPOLGY	MINIMUM PROVISION PER 1,000 PEOPLE	PROVISION FOR SITE (170 UNITS @ 2.35 PERSONS PER HOUSEHOLD)	ACHIEVED	AREA (HA)
Parks & Gardens	1.50	0.90	Y	0.85
Natural and semi natural green spaces	2.50	1.00	Y	2.47
Green corridors	0.40	0.16	Y	0.36
Outdoor sports facilities	3.50	1.40	OFF SITE PROVISION	0
Amenity green space	1.10	0.44	Y	0.55
Provision for children and young people	0.20	0.08	2X LEAP, 3X LAP	0.11
Allotments and community gardens	0.65	0.26	OFF SITE PROVISION	0
Cemeteries and churchyards	0.50	0.20	OFF SITE PROVISION	0

BARBY LANE, RUGBY - DEVELOPMENT FRAMEWORK PLAN



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KEY

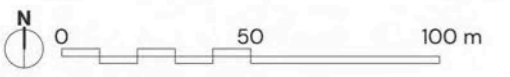
- SITE BOUNDARY
- SITE ACCESS VIA BARBY LANE
- RESIDENTIAL DEVELOPMENT UP TO 212 DWELLINGS (AT 35 DPH)
- SCHOOL EXTENSION LAND 0.5 HECTARES
- PUBLIC OPEN SPACE (inc suds) 6.33 HECTARES - 49% OF TOTAL REDLINE AREA
- TREE LINED PRIMARY STREET
- TREE LINED SECONDARY STREET
- TREE LINED TERTIARY STREETS
- FOCAL SPACES
- PRIVATE LANES
- ACTIVE TRAVEL ROUTES
- EXISTING TREES
- NEW STRUCTURAL PLANTING
- NEW BUFFER PLANTING
- NEW TREE PLANTING
- COMMUNITY ORCHARD
- LOCALLY EQUIPPED AREA FOR PLAY (LEAP)
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- INFORMAL KICK ABOUT SPACE
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- SUSTAINABLE DRAINAGE
- EXISTING BODIES OF WATER
- EXISTING PUBLIC RIGHTS OF WAY
- POTENTIAL CYCLE AND PEDESTRIAN CONNECTION
- 5M CONTOURS

- ### KEY PRINCIPLES
1. PRIMARY ACCESS POINTS VIA BARBY LANE;
 2. PRIMARY VEHICULAR MOVEMENT WITH INTEGRATED TREE PLANTING AND GRASS VERGES;
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 8. MAXIMUM RETENTION OF EXISTING TREES AND HEDGEROWS ON SITE, FORMING GREEN CORRIDORS AND WALKING ROUTES;
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Rugby Borough Council: Open Space, Playing Pitch and Sports Facilities Study November 2015

TYPOLGY	MINIMUM PROVISION PER 1,000 PEOPLE	PROVISION FOR SITE (212 UNITS @ 2.38 PERSONS PER HOUSEHOLD)	ACHIEVED	AREA (HA)
Parks & Gardens	1.50	0.75	Y	0.85
Natural and semi natural green spaces	2.50	1.25	Y	4.04
Green corridors	0.40	0.20	Y	0.36
Outdoor sports facilities	3.50	1.75	OFF SITE PROVISION	0
Amenity green space	1.10	0.55	Y	0.59
Provision for children and young people	0.20	0.10	3X LEAP; 2X LAP	0.11
Allotments and community gardens	0.65	0.32	Y	0.38
Cemeteries and churchyards	0.50	0.25	OFF SITE PROVISION	0

BARBY LANE, RUGBY - DEVELOPMENT FRAMEWORK PLAN



Appendix A

Landscape and Visual Technical Note (Pegasus, May 2025).

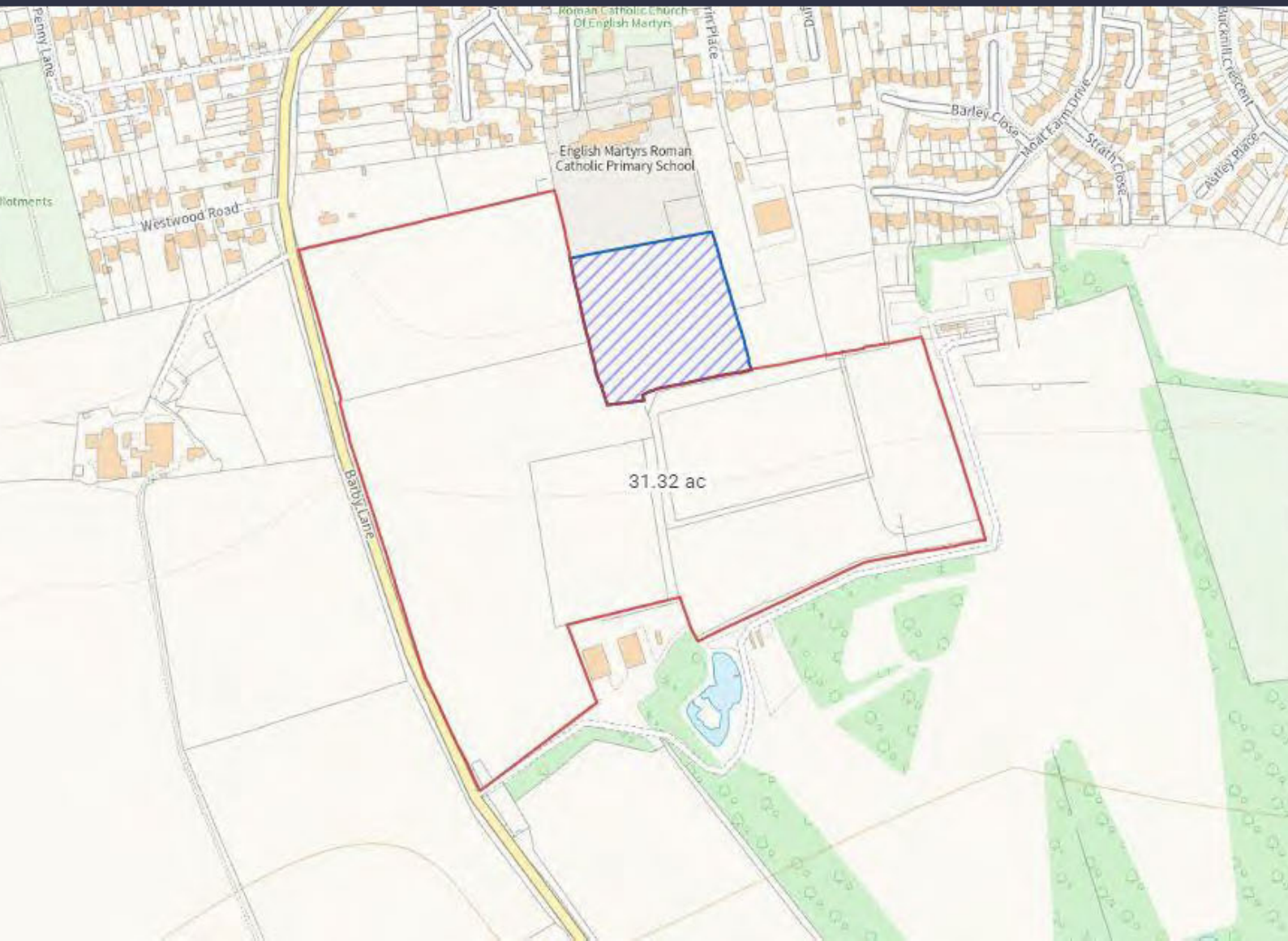
Landscape & Visual Technical Note.

Land at Barby Lane, Rugby.

On behalf of Persimmon Homes West Midlands.

Date: May 2025 | Pegasus Ref: P25-1332 R001

Author: David Webster CMLI MA MSc BSc (Hons)





Document Management.

Version	Date	Author	Approved	Reason for revision
00	23.05.25	DW	DW	For comment



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3. Visual Baseline.....	16
4. Landscape Strategy.....	21
5. Summary & Conclusions.....	22



Appendices.

Appendix A: Extract – HELAA Appendix 4 – Proforma Site 146

Appendix B: Extract – Preferred Option Draft – Proforma Site 334

Appendix C: Extract– Landscape Sensitivity Assessment of Strategic Site Options – Proforma Site 146

Appendix D: Extract – Landscape Sensitivity Assessment of Strategic Site Options – Proforma Site 334

Appendix E: Extract – Landscape Sensitivity Assessment of Strategic Site Options – Site Photography

1. Introduction.

- 1.1. This Landscape & Visual Technical Note (the 'Note') has been prepared by Pegasus Group on behalf of Persimmon Homes West Midlands in respect of Land at Barby Lane, Hillmorton, Rugby, CV22 5QL (the 'Site'). The Site is located within the administrative boundary of Rugby Borough Council (RBC).
- 1.2. The RBC *Housing and Economic Land Availability Assessment (HELAA, 2025)*¹ identifies 'South of Hillmorton' as a potential broad location for housing development. The Site is identified as part of a wider parcel of land identified at **Site 146: Land off Barby Lane**. The proforma for the Site (see **Appendix A**) records the 58.4ha area as being in agricultural (Grade 2 & 3) / commercial use and considered for 380 units of potential residential yield (please refer to **Figure 1**):

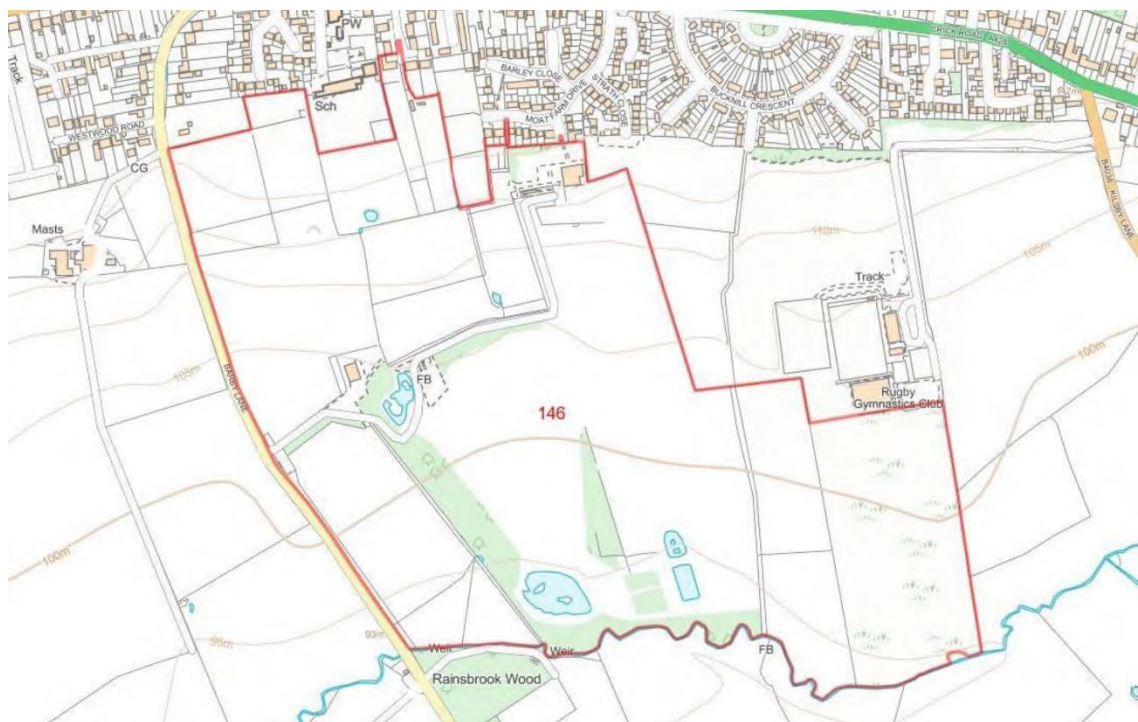


Figure 1: Extract from HELAA – Appendix 5

- 1.3. The proforma concludes that the Site is available, achievable, and 'potentially' suitable, and in relation to suitability states:

"Given the topography of the Site the southern third could be utilised as a landscape buffer/biodiversity off-setting area. PROW runs through Site. Within Air Quality Management Area. Within potential GI area - consider impacts. Part of Site contains a Local Wildlife Site and a Potential Local Wildlife Site. Previous landscape study found Landscape Sensitivity - Medium (northern part) - 17i. High (southern part) - 14a. Surface water flooding occurs within southern portion of Site. Landscape impact needs consideration. Further assessment required to determine sustainability of Site."

¹ [RBC Housing and Economic Land Availability Assessment \(HELAA, 2025\)](#)

14. The RBC *Stage 2 Site Options Assessment (2025)*² involved a detailed assessment of 112 Sites identified in the HELAA as not being developable without changes to policy. The assessments provide a technical analysis of opportunities and constraints, conducted from mid-2024 to March 2025. RBC officers visited all Sites to verify the accuracy of information submitted and to gain a hands-on understanding of the various Sites and their context. A landscape sensitivity assessment was undertaken for each Site, and the overall landscape sensitivity of Site 146 was recorded as **Medium** with the stating (see **Appendix B**):

“The Site consists of fields enclosed by hedgerows and trees, situated at the urban fringe with settlements to the north. There are no known cultural heritage or historic features within the surrounding landscape. The Site holds recreational value due to the presence of Public Rights of Way (PROWs) both within and within 200 meters of the area. Expansive views of the surrounding landscape contribute to scenic quality, while high levels of tranquility and a strong sense of enclosure create a peaceful environment. Overall, the landscape exhibits medium levels of sensitivity due to its scenic value, recreational opportunities, and tranquil atmosphere, indicating the need for careful management and consideration in any potential development or land-use changes.”

15. Owing to the identified landscape sensitivities linked to the PROW and ecological sensitivities to the east and south, Site 146 was not progressed beyond the Stage 2 Assessment but was instead redrawn as **Site 334** comprising just the north-west part of the Site (see **Figure 2**):



Figure 2: Extract from Preferred Options Draft (March 2025)

16. The RBC *Sustainability Appraisal (2025)*³ notes that Site 334 (with potential housing yield of 400 homes) comprises part of a larger promoted Site and acknowledges that the larger Site

² [RBC Stage 2 Site Options Assessment \(2025\)](#)

³ [RBC Sustainability Appraisal \(2025\)](#)



could potentially deliver additional infrastructure benefits, but a 400 home scheme would enable land to be made available for potential expansion of the adjacent primary school. The report also notes land availability issues at the current time, with a bearing on the potential to achieve active travel links (Paragraph 5.4.17). Site 334 is described as a 'modest' urban extension to Rugby that would be reasonably well-located in respect to active and public transport (Paragraph 6.2.13).

17. The report describes local concerns regarding the sensitive nature of the urban edge in this area given the descending topography to the Rains Brook Valley (Para 6.2.34). Under 'Landscape and townscape' the appraisal records that South Rugby is broadly a sensitive sector of land given the relationship between the edge of Rugby / Hillmorton and the Rains Brook Valley / Oxford Canal to the south. The boundary to Site 334 has been *"defined with the specific aim of securing containment and minimising landscape impacts and there is some screening from important viewpoints. Nonetheless this is one of the more landscape sensitive Sites assessed and it as has been identified as having **Medium** landscape sensitivity"*.
18. The RBC *Preferred Options Draft (2025)*⁴ was recently published for public consultation and includes Site 334 as a draft allocation. The proforma for Site 334 records the Site as being 19.22ha in area with an allocation of circa 400 dwellings, and lists a number of development requirements (See **Appendix B**):

Extension of pedestrian footway on Barby Lane to link to Site entrance;

Cycle and pedestrian connection required to Moat Farm Drive, Florin Place and Barley Close;

Retention and reinforcement of existing tree belt on the Site's southern boundary and retention and reinforcement of the hedgerow to Barby Lane;

Creation of footpath to link to the footpath which runs alongside Rugby Borough Football Club;

Development is to take into account the Site's topography and avoid excessive retaining structures. This should be achieved through an east-west street pattern and dwellings facing north and south;

If possible, pedestrian connections into Hillmorton Vale should be created; and

Provision of land for expansion of English Martyrs Primary School (if required).

19. It is understood that the red line boundary of the Site represents a smaller parcel of land, and that Site 334 includes land within the ownership of 3rd parties who may wish to be included in the bid at a later stage. The main land owner has confirmed that they would include approximately 31.32 acres of land, illustrated on the cover image. The land hatched blue on the enclosed plan is owned by the Birmingham Diocese and can possibly be made available.

⁴ [RBC Preferred Options Draft \(2025\)](#)



- 1.10. It is also noted that a planning application for up to 113 dwellings (ref: R16/2490) was refused on 27th July 2017, primarily on the basis of *“significant and adverse impact on the character and appearance of the landscape in this location. In particular, the proposed dwellings would appear as an intrusive extension of the urban area into the surrounding countryside and would diminish the landscape character of this area. They would further appear visually intrusive and prominent within the landscape to the point of being harmful to the qualities, character and amenity of both the countryside and setting of Hillmorton. The proposed mitigation would not adequately reduce these impacts to an acceptable level. The adverse impacts that would arise from this would consequently significantly and demonstrably outweigh the benefits of the proposed development”*.
- 1.11. Sites 146 and 334 were both considered by the RBC *Landscape Sensitivity Assessment of Strategic Site Options (2025)*⁵ and the proformas are included at **Appendices C and D** respectively.

⁵ [RBC Landscape Sensitivity Assessment of Strategic Site Options \(2025\)](#)

2. Landscape Baseline.

- 2.1. This section of the report establishes the landscape baseline on the basis of a desk study alone to identify and record the character of the landscape, and the elements, features and aesthetic or perceptual factors that contribute to the Site's character. The sensitivity of identified landscape features and the character of the Site itself will be assessed by combining judgements of their value and susceptibility to residential development.

Location & Land Use

- 2.2. The Site adjoins the south-eastern edge of Hillmorton, an existing residential suburb of Rugby which has a mixed tenure of residential development, predominately 2-storeys. The Site is therefore located on the urban edge of Rugby, adjoining existing residential development to the north.
- 2.3. The Site comprises semi-improved grassland fields and mature intact hedgerows and hedgerow trees defining the field boundaries to the south, east, west, and partially to the north. Barby Lane borders the Site's western boundary; rear gardens of existing residential properties on Barby Lane and Fellows Way contains the northern boundary; mature intact hedgerows and hedgerow trees form the Site boundaries to the east; and the southern boundary of the Site is contained by an access route between Barby Lane and Moat Farm / Tacit Golf Shop that is lined by semi-mature trees and other vegetation.

Access & Connectivity

- 2.4. The Site can be accessed from Barby Lane via a track that leads towards Moat Farm / Tacit Golf Shop, that is primarily accessed from Moat Farm Drive to the north-east of the Site. There are no other tracks apparent within the Site boundary. It is anticipated that a new Site entrance will be created off Barby Lane to service the Site.
- 2.5. There are no Public Rights of Way (PRoW) passing through the Site or running directly adjacent to its boundaries; however, there are several PRoW within the surrounding landscape, particularly to the south of the Site:

PRoW 333/RB29/1 is a public footpath approximately 185m to the west of the Site on the opposite side of Barby Lane running from Ashlawn Road to Rains Brook (RB29), and then onwards to Norman's Bridge.

PRoW 333/RB28/1 is a public bridleway approximately 250m to the east of the Site, running from Bucknill Crescent to Rains Brook (RB29), and then onwards to Norman's Bridge.

There are a number of short PRoW within Hillmorton to the north of Site; however, none are predicted to have significant views toward Site due to the intervening built form.

- 2.6. There is a longer promoted walking route, the Oxford Canal Walk, that follows the towpath for 77 miles between Oxford and Hawkesbury, to the west of the Site, using a continuous canal towpath that passes 43 locks located approximately 1.3km to the south-east of the Site.



Topography & Hydrology

- 2.7. The Site's location on the southern edge of Hillmorton and the slopes of the southern escarpment results in the potential for intervisibility with the surrounding area. The landform of the Site Slopes noticeably from north to south. The highest part of the Site is the northern boundary at approximately 122m Above Ordnance Datum (AOD) and falls to the lowest point on the south-western boundary at approximately 102m AOD.
- 2.8. The topography of the Site and its immediate landscape context is formed by a low, broad valley that slopes south towards Rains Brook which runs east to west. Rains Brook is located approximately 340m from the Site's southern boundary at its nearest point. From Rains Brook the valley rises up towards the villages of Barby and Kilsby. Barby Hill is located due south of the Site and sits at 149m AOD. There is a steep gradient to the west of Barby down to 100m AOD where the Oxford Canal runs diagonally north-east towards the eastern edge of Hillmorton. To the north of the Site the land plateaus and largely remains at 120m AOD throughout Hillmorton.
- 2.9. There are two small waterbodies located within the Site, and a larger feature within the land owned by the Birmingham Diocese, between the Site and the primary school. There is a larger waterbody located to the immediate south of the Site, enclosed in woodland. Within the wider landscape the Oxford Canal is a significant hydrological corridor which is located south of the Site and as such any indirect effects should be given due consideration.
- 2.10. The Site is not recorded as being within a Flood Zone by the Environment Agency. Taking these matters into account, the topographic and hydrological character of the Site is considered to be of **Medium** value.

Vegetation

- 2.11. The Site comprises semi-improved grassland fields with mature intact hedgerow boundaries and hedgerow trees. The hedgerow boundaries appear to enclose the Site to the north, east and west. There is a defunct hedgerow containing hawthorn, ash and apple running through the Site.
- 2.12. The Arboricultural Assessment accompanying the previous planning application identified a number of Category A and B trees within the perimeter hedgerow. These trees will need to be protected from future development proposals, in particular the required access from Barny Lane. The report notes that there were no trees, tree groups or woodlands subject to a Tree Preservation Order (TPO) within or adjacent to the planning application boundary.
- 2.13. The Site does not appear to contain any rare or unusual landscape features. The majority of trees on the Site appear to be located around the Site perimeter; however, there are a number of scattered trees running through the central parts of the Site. Overall, the vegetation on the Site is judged to have a **Medium** value.
- 2.14. It is also noted that the Council's Green and Blue Infrastructure Policies Map⁶ identifies a Potential Green Infrastructure Corridor washing over the Site.

⁶ [Green and Blue Infrastructure Policies Map – RBC](#)



Designations

- 2.15. There are no statutory landscape designations (National Parks or National Landscapes) or local landscape quality designations (such as Areas for Great Landscape Value or Special Landscape Areas) within the Site or study area.
- 2.16. Within the wider study area there are a small number of landscape related designations that are noted as part of their contribution to landscape character and landscape value. These include the Bilton Grange and Dunchurch Lodge Registered Park and Gardens (RPG) located approximately 3.29km and 4.12km south-west of the Site respectively.
- 2.17. There are no listed buildings within the Site; however, there are four Grade II Listed buildings/structures in the close vicinity of the Site (approximately 200–400m); two Scheduled Monuments (SM) some 300m–400m north and north-east of the Site; and other non-designated heritage assets lie over 1km from the Site. The settings of the Listed buildings and SMs are unlikely be adversely affected by any development at the Site given the distance and intervening built form and vegetation.
- 2.18. RBC has designated the historic core of Hillmorton Locks as a Conservation Area, whilst Daventry District Council has designated the Oxford Canal itself. There are published CA appraisals for these areas. It is judged extremely unlikely that the Hillmorton Locks CA and/or the Oxford Canal CA will experience direct or indirect effects resulting from development of the Site given the distance and intervening built form and vegetation. Nonetheless, a detailed heritage assessment should accompany any future planning application.
- 2.19. The Site is not located within or near to any Site of Special Scientific Interest (SSSI); however, the Linnell Road LNR is located approximately 980m to the north of the Site.
- 2.20. The Kilsby Lane Meadow Local Wildlife Site (LWS) adjoins the eastern boundary of the Site, comprising a large rectangular enclosure field consisting of a low-lying damp hay meadow leading down to the Rains Brook. This area still displays ridge-and-furrow showing that it has not been disturbed by ploughing. The rest of the field occupies a gentle slope was probably originally sheep pasture. The field is now being managed as a nature conservation area by RBC, which has involved constructing two new ponds and planting a new hedge along the northern boundary where it adjoins the football club. These habitats support a range of breeding farmland birds and invertebrates.
- 2.21. There are no known Tree Preservation Orders (TPO) or ancient woodland within or in proximity to the Site.

Landscape Character

- 2.22. Landscape character is described by Natural England's guidance note *An Approach to Landscape Character Assessment (2014)*⁷ as:

"... a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse."

⁷ [An Approach to Landscape Character Assessment \(2014\) - Natural England](#)



- 2.23. There are a number of published assessments at various scales that classify, describe and evaluate the landscape of the Site and study area, as illustrated by **Appendix F: Landscape Character Plan**. The scale of assessment for this LVA focuses on local Landscape Character Areas/Types (LCA/T); however, the National Character Areas (NCA) provide a useful starting point to understand the surrounding landscape context.

National Level

- 2.24. At a national level, the Site is located within **NCA 96: Dunsmore and Feldon**⁸, where the relevant key characteristics include:

The sense of a predominantly quiet, rural landscape is heightened by its close proximity to several urban areas, with a gently undulating landscape of low hills, heathland plateau and clay vales separated by the occasional upstanding escarpment.

Light sandy soils associated with the west (Dunsmore) supporting mixed farming and some intensive arable.

Generally low woodland cover across the area, although there are areas of well-wooded character and ancient woodlands, especially in the north, providing habitats for bluebells, mollusks and fritillary butterflies; these woodlands are linked with landscaped parklands and hedgerow trees.

Canals provide important riparian habitats and a well-used recreational resource.

Mainly large fields, with regular or rectilinear shapes, although some smaller fields also feature. Numerous areas of remnant ridge-and-furrow and earthwork remains of medieval settlements.

Predominantly nucleated settlement pattern with a low density of isolated farmsteads and some field barns sitting within a landscape of piecemeal and planned enclosure of the open fields which extended from the villages over large parts of this area. Many villages have recently expanded but the traditional buildings, constructed of red brick or Lias limestone, still retain their blue brick or ironstone details.

The busy roads and large industrial units on the outskirts of the main settlements of Leamington Spa, Coventry and Rugby exert an urban influence on the surrounding area.

- 2.25. The relevant statements of Environmental Opportunities defined in the NCA profile are:

Protect and appropriately manage the historic character, settlement pattern and features of Dunsmore and Feldon, ... and enhance the educational, access and recreational experience for urban and rural communities.

Protect and appropriately manage the important network of natural and manmade rivers, streams, ponds, canals and other wetland habitats for their important role in

⁸ [NCA Profile: 96 Dunsmore and Feldon - NE469](#)



water provision and water quality, for the species they support and for their contribution to recreation, sense of place and geodiversity.

Protect and manage the mosaic of habitats including woodlands, hedgerows and heathlands ...

Protect and manage the landscape character, high tranquility levels and the historic settlement character to enhance sense of place and of history and to promote recreational opportunities; and ensure that new development is sensitively located and designed, integrate green infrastructure links into development, encourage new woodland planting to soften urban fringe developments and promote recreational assets such as the National Cycle Routes.

Borough Level

- 2.26. At a Borough level, the Landscape Assessment of the Borough of Rugby (Sensitivity and Condition Study)⁹ was carried out by the Living Landscapes Project in conjunction with Warwickshire County Council and Rugby Borough Council in 2006. The aim of the study was to examine the character of the landscape around Rugby, its sensitivity to change, the condition of the countryside abutting Rugby's urban fringe and beyond, and to demonstrate how the outcomes could be used as a decision tool in the development planning process.
- 2.27. More recently, this study has been updated by the Rugby Borough Landscape Character Assessment (2025)¹⁰ authored by Lepus Consulting. The boundaries and descriptions of the LCAs and LCTs identified in the 2006 study form the basis for the updated classification.
- 2.28. The assessment identifies the Site as straddling both the **Dunsmore** and **Feldon** Landscape Character Areas (LCA), that are describe as being centrally located within the borough. The assessment notes that the character of Dunsmore is shaped by its rich historical and ecological features and strongly influenced by the area's geology:

"This area, with its intensively farmed and partially urbanised landscape, is marked by varied rolling topography and characterised by low glacial plateau and meandering river valleys. The widespread presence of glacial sands and gravels has contributed to its historical association with heathland and common land, despite little of the health remaining today... Semi-natural habitats are limited to small pockets of unimproved grassland, wetland areas and flood meadows along river corridors, as well as ancient woodland complexes to the west. These ancient woodlands, mature hedgerow oaks and historic parklands, give the region a well-wooded appearance."

- 2.29. More specifically, the Site is located within the **Dunsmore – Plateau Fringe** Landscape Character Type (LCT) described as:

"Plateau Fringe is a variable, farmed landscape with a gently undulating topography of low rounded hills and narrow meandering river valleys of the Avon and Leam. 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

⁹ [Landscape Assessment of the Borough of Rugby – Sensitivity and Condition Study \(2006\)](#)

¹⁰ [Rugby Borough Landscape Character Assessment – Lepus Consulting \(2025\)](#)

fields. Small, nucleated villages are a characteristic feature, comprising of loose clusters of dwellings and isolated, brick-built farmsteads.”

2.30. The assessment identifies the following ‘forces for change’ that are relevant:

Inappropriate development bordering woodlands, causing habitat fragmentation and species isolation;

Loss of mature trees remnant from the 1970s epidemic has exacerbated habitat fragmentation;

Loss of hedgerows due to urban development and agricultural intensification. The creation of larger fields has exacerbated habitat fragmentation. In addition, there has been a general decline in the practice of hedge laying and an increase in annual trimming, resulting in gaps and loss of structure; and

Sensitive design is lacking in some new residential developments, particularly around historic villages and Rugby’s peri-urban areas. A high number of converted redundant farm buildings for residential and holiday use are not in line with the landscape character.

2.31. The report suggests the following guidelines to plan, manage and protect the distinctiveness of the Dunsmore LCA:

Protect hedgerows and hedgerow trees, many of which are Oak trees (*Quercus robur*);

Maintaining and enhancing the enclosed wooded character of the landscape;

Maintaining and enhancing the distinctive character of the landscape;

Enhance the structure and key features of the farmed landscape. This is especially important in the Plateau Fringe which is generally in decline;

Planting of woodlands should be encouraged where appropriate. The mosaic of habitats including woodlands, hedgerows and heathlands, alongside the sustainable management of agricultural land will enhance the character of the landscape;

Enhance the character of settlements in accordance with the landscape through improved design standards. Increased development and property improvements from population change and increased affluence is having an urbanising impact on settlements and dwellings.

2.32. The Feldon LCA is a lowland agricultural region strongly influenced by Tudor and Parliamentary enclosures. It is characterised by heavy clay soils and a nucleated settlement pattern of small rural villages. Feldon comprises the southern area of Rugby. At a more granular level, the **Feldon – Vale Farmlands** LCT is described as:

“Vale Farmlands is the most typical landscape within Feldon, characterised by a flat, open hedged landscape with few roads or settlements. It comprises a largely intact pattern of medium to large-sized geometric fields bounded by hawthorn hedges and little tree cover, offering wide views of the rising ground and a strong impression of sky and space.

Villages are typically few and far between and often consist of small 'open' clusters of farmsteads and dwellings. Deserted medieval villages remain in some areas. The roads in these areas are typically single track bound by thick hedge. Therefore, the pastoral and hedged character of the landscape should be conserved and restored."

2.33. The assessment identifies the following 'forces for change' that are relevant:

Dutch elm disease has led to significant loss of the once-abundant Elm (*Ulmus*) trees in hedgerows;

The population of nationally scarce butterfly species is in an unfavourable declining condition. Retaining and improving foodplant cover is key to maintain the population of White-letter Hairstreak. Wood White is unlikely to be reestablished unless reintroduced; and

Agricultural intensification has resulted in the removal of hedgerows, leading to larger fields.

2.34. The report suggests the following guidelines to plan, manage and protect the distinctiveness of the Feldon LCA:

Conserve the structure and remote rural character;

Conserve the diversity and local distinctiveness;

Protect and manage the historic character, settlement pattern and features of Feldon;

Enhance educational and recreational experience for urban and rural communities;

Maintain and protect high levels of tranquility; and

Address high phosphates, pesticides and sedimentation in water bodies, particularly within the Leam catchment, to ensure good ecological status. Promote the River Leam Catchment Plan and agri-environmental schemes to farmers and landowners.

The Character of the Site

2.35. The Site is located on the urban settlement edge of Hillmorton, which forms a regular edge to the northern boundary, overlooked by residential properties (rear gardens) – defined by the typical variety of domestic fences and hedges. The centre of Hillmorton is located approximately 500m to the north-east and provides transport links to Rugby as well as a number of local facilities and shops. This settlement edge restricts intervisibility to the north of the Site. The main road through Hillmorton is the B4429 leading to Daventry International Rail Freight Terminal to the west and Dunchurch to the east.

2.36. The Site is perceived within the context of both urban and rural characteristics. The character of the Site is influenced by the close proximity of the B4429, with notable traffic flows off Barby Lane, in addition to surrounding residential, and suburban land uses (i.e. schools, recreational grounds and shops) with a clear perception of adjoining the urban edge.

2.37. It is acknowledged that the Site is valued locally by residents, particularly by those with existing views to the south. However, the landscape in which the Site is located is not



designated for its scenic value, nor are there any unique or particularly valuable features within the Site, aside from the unified field pattern, mature hedgerows and hedgerow trees which contribute to its local value.

- 2.38. There are no PRoW passing through the Site or running directly adjacent to its boundaries, and as such, the Site currently has no recreational value.
- 2.39. The Site is generally enclosed by the surrounding mature boundary vegetation, and particularly so in summer. Consequentially views into the Site are likely to be filtered or limited to those available across the Site from the local road network, local residents and the surrounding PRoW network.
- 2.40. The localised topography of the area means that the Site is likely to be visible from a number of locations to the south, with potential for intervisibility with the Oxford Canal CA. The Site itself provides open views to the south of the surrounding countryside (see **Appendix E**), towards Barby Hill. However, the noise of vehicles using the adjacent road network is perceptible from the Site.
- 2.41. There are no national or local designated heritage assets falling within or immediately adjacent to the Site. The Site itself also considered not to possess any readily identified cultural associations or links with the wider area.
- 2.42. The following criteria have been assessed when considering the landscape value of the Site:

Natural heritage: The Site comprises a patchwork of small-scale fields, divided and bounded by intact hedgerows with trees which create a sense of enclosure. The topography falls from north to south, from approximately 120m to 105m AOD. Land cover across the Site is mostly pastoral with some arable areas. Fields are divided and bounded by hedgerows with trees. Small ponds are present within the Site.

Cultural heritage: there are no national or local designated heritage assets falling within or immediately adjacent to the Site. The Site itself also considered not to possess any readily identified cultural associations or links with the wider area.

Landscape condition: the Site is generally in good condition, with the unified field pattern, mature hedgerows and hedgerow trees which contributing to its local value.

Associations: there are no known connections to notable people, events or the arts.

Distinctiveness: the Site does not demonstrate a strong sense of identity. The Site is at the urban edge of Hillmorton, to the south of residential dwellings and a school (English Martyrs Catholic Primary School). Barby Lane runs along the western boundary of the Site. A private driveway runs along the southern and eastern Site boundaries. The A428 is located approximately 100m to the north of the Site. Commercial/agricultural buildings are present within the Site.

Recreational: there is a public footpath that passes along the northern boundary of the Site; however, whilst the Site is fully accessible from Hinckley Road, there is no obvious signage to indicate the routing through the western part of the Site. There is no evidence of regular use of the footpath, and whilst the underpass below the M69 is accessible, the onward footpath connection is not identifiable. The Site is in use for horse grazing and therefore private recreational use.

Perceptual (scenic): The Site is situated at the urban fringe with development at Hillmorton to the north. Despite the presence of nearby roads and urban areas, the Site retains some scenic qualities due to the presence of open countryside to the south.

Perceptual (wildness & tranquility): The Site is located on the urban fringe and remoteness levels are limited. However, tranquility levels are generally good with hedgerows and trees creating a sense of enclosure from surrounding roads and built form.

Functional: The Site forms the part of a transitional, peri-urban landscape at the settlement edge of Hillmorton. Land cover across the Site is mostly pastoral with some arable areas

Summary

- 2.43. It would be expected that a 'valued landscape' would demonstrate the presence of a number of indicators of landscape value, as set out above. On balance, the Site is **not** considered to be a valued landscape in accordance with Paragraph 187(a) of the NPPF.
- 2.44. On balance, it is judged that the well-enclosed nature of the Site offers the capacity to accommodate residential development of type proposed (circa 380 dwellings). Higher density development should be introduced within the northern part of the Site and sensitively integrated with existing residential development at Hillmorton. Ideally, densities should reduce in the southern parts of the Site with dwellings facing onto an area of POS creating a landscape buffer with the Rains Brook Valley.
- 2.45. A summary of the constituent landscape features of the Site, its character, and the character of the surrounding landscape is set out in **Table 1** (below):

Receptor	Value	Susceptibility	Sensitivity
Land Use	Low	High	Medium
Topography	Medium	Low	Medium - Low
Hydrology	Medium	Medium	Medium
Hedgerow	Medium	Medium	Medium
Canopy Trees	High	Low	Medium
The Character of the Site	Medium	Medium	Medium
	Medium	Low	Medium - Low
	Medium	Low	Medium - Low

Table 1: Summary of landscape receptors

3. Visual Baseline.

- 3.1. A desktop visual appraisal was undertaken to determine the relationship of the Site with its surroundings. The visibility of the Site is predominantly influenced by landform and the extent and type of vegetation cover and built elements within the surrounding landscape.
- 3.2. The LVIA submitted with the previous planning application (ref: R16/2490) included a ZTV that suggested that the visibility of the proposed scheme covered a large extent of the 5km study area, particularly to the south-west, south-east and north-east. However, field observations subsequently confirmed that localised vegetation within the wider landscape significantly reduced the extent of visibility towards the Site. Across the study area, vegetation is more extensive than indicated by the ZTV, consisting of field boundaries that are typically tall, mature hedgerow; some tree belts along field boundaries and water courses; and extensive tree cover surrounding settlements.
- 3.3. On this basis, it was confirmed that views of the proposed development would generally be confined to the more open fields to the south of the Site, up to approximately 2-3km from the Site boundaries. The extent of actual visibility is shown below at **Figure 3** and includes the area to the south-west up to the dismantled railway line and Onley Lane; the southern edge of Barby and Kilsby; Barby Lane and Rugby Road to the south and south-east; Oxford Canal and the PRow network to the south:

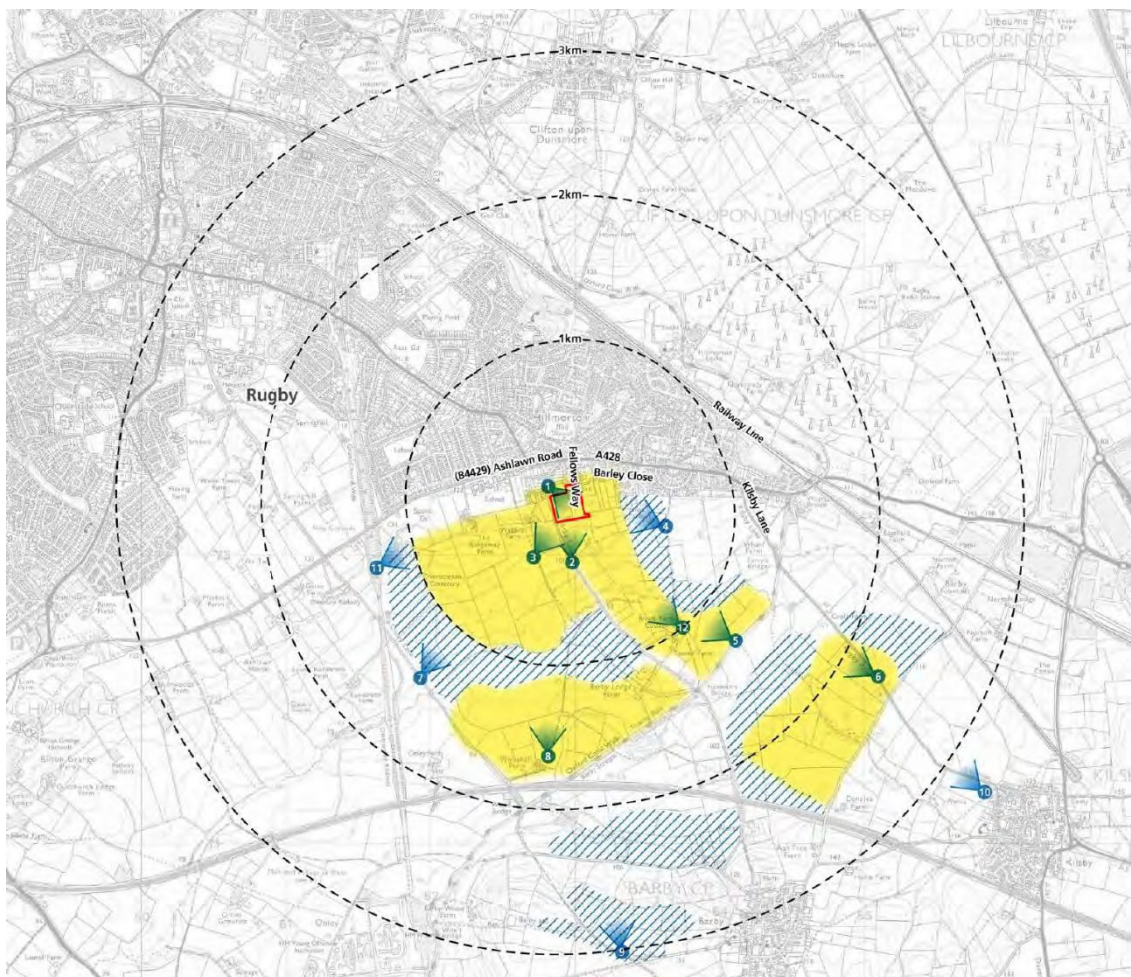


Figure 3: Extract from LVIA (EDP, 2017)

Visual Receptors

- 3.4. On the basis of the visual baseline above, a series of visual receptors have been selected against which the effects on visual amenity can be assessed. Each visual receptor, meaning the particular person or group of people likely to be affected at a specific viewpoint, has been assessed in terms of both their susceptibility to change in views and visual amenity, and also the value attached to particular views. The susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of:

the occupation or activity of people experiencing the view at particular locations; and

the extent to which their attention or interest may therefore be focused on the views and the visual amenity they experience at particular locations.

- 3.5. Visual receptors, together with their susceptibility, value of views, and resultant overall sensitivity of receptor to development of the type proposed are set out below.

Local Residents

- 3.6. Nearby residential receptors with close-range views towards the Site are broadly limited to dwellings immediately to the north and east of the Site boundary within the 250m threshold. Receptors include residents on Barby Lane, Westwood Road, Fellows Way, Moat Farm Drive and Barley Close which have front-facing or side windows facing the Site. Their views are considered to have a **Medium** value, given the moderate scenic value of the area with notable urban fringe characteristics evident; however, residents are typically considered to have a **High** susceptibility. Overall, their sensitivity is considered to be **Medium – High**:

Only a single property has a back garden directly adjoining the Site's northern boundary. Several others have the potential for overlooking views. Many of these properties will have clear, unfiltered views across the northern part of the Site from ground floor and first-storey rooms. The adjoining property benefits from a large garden containing several mature trees that will filter and screen views of the Site;

Waldins Farm is located approximately 135m to the west of the Site accessed off Barby Lane, and The Ridgeway Farm is located 350m further to the west. Both farmhouses are likely to experience filtered views from upper storey windows, however the dwellings are orientated in a north-south direction and therefore would largely face away from the Site;

Views experienced from the southern edge of Barby village would tend to be fragmented and/or heavily filtered, and comprise a visual baseline that, for the most part, would be defined by the settlement edge context to the Site;

Brook Farm Cottage and Tower Farm, situated approximately 1km south of the Site, are likely to have clear to filtered views of the Site from upper storey living spaces through the Site's open southern boundary. Views from the Barby Lodge Farm are more restricted by the intervening Rains Brook Wood; and

Wharf Farmhouse (Grade II Listed) located 1.5km to the south-east of the Site off Kilsby Lane is orientated in a westerly direction with front facing views towards the Site; however, mature intervening vegetation filters and screens views of the Site.

Users of Local Roads

- 3.7. There are limited uninterrupted, close-quarter views (i.e. less than 500m from the Site boundary) towards the Site from sections of the local road network. Views from the local road network in the vicinity of the Site are not in themselves designated and are considered to have a moderate scenic value with notable urban fringe characteristics evident, with a resultant **Medium** value. Motorists travelling on minor roads are considered to have a **Medium** susceptibility. Overall, their sensitivity is considered to be **Medium**:

Barby Lane: This road extends from the A428, south-west of Rugby leading directly to Rugby town centre; a distance of some 3km. No views of the Site can be gained from the A428 owing to the intervening built form. Views towards the Site from Barby Lane are likely to be experienced from approximately 50m north of the Site when rounding the bend in the road; however, in general Views into the Site from Barby Lane are filtered by hedgerows and trees. Further views towards the Site can be gained from Barby Road travelling in a northerly direction from up to 1km from the Site. The views are direct and/or oblique depending on the alignment of the lane, albeit still filtered by the roadside vegetation and tree line;

Onley Lane: This lane is located approximately 1.3km to the west and south-west of the Site, and intervening field vegetation and the vegetation associated with Rains Brook effectively limit intervisibility. There are limited longer-range views from Onley Lane to the south of the M45 where again intervening trees and woodland largely filter the Site from view.

Rugby Road: This road is located approximately 850m to the east and south-east of the Site, connecting Kilsby to Hillmorton. Views towards the Site are heavily filtered by the intervening vegetation; however, when approaching Kilsby Lane filtered views of the Site are available; and

There are no views available from the A45 approximately 3.5km to the south-east of the Site given topography and intervening vegetation.

Users of PRow Network

- 3.8. There are a number of PRow within 3km of the Site. There is a concentration directly south of the Site, running an east-west direction within the surrounding open countryside; the distribution is denser to the south and south-west, joining the Oxford Canal, and sparser to the south-east until reaching Kilsby.
- 3.9. Views from the PRow network in the vicinity of the Site are not in themselves designated and are considered to have a moderate scenic value with notable urban fringe characteristics evident, with a resultant **Medium** value. Users of PRow are clearly engaged in recreational activities, and therefore considered to have a **High** susceptibility. Overall, their sensitivity is considered to be **Medium - High**.

Barby Hill

- 3.10. Barby Hill is located due south of the Site at 149m AOD. As the landform rises up to Barby Hill there are a number of footpaths that have a distant view across the valley and towards the Site. However, views are heavily filtered by the intervening vegetation in the landscape and built form comprising the urban edge of Hillmorton already forms part of the baseline context.



- 3.11. Views from Barby Hill towards the Site are not in themselves designated and are considered to have a moderate scenic value with notable urban fringe characteristics evident, with a resultant **Medium** value. Users of PRow in this area are clearly engaged in recreational activities, and therefore considered to have a **High** susceptibility. Overall, their sensitivity is considered to be **Medium – High**.

Users of the Oxford Canal

- 3.12. Views are from a well-used recreational route. Potential receptors include those using canal boats and users of the tow path, including those walking the promoted Oxford Canal Walk. In practise views towards the Site are typically limited by intervening vegetation or built form when passing through the Hillmorton Locks and Oxford Canal CAs. The views are considered to have a **Medium** value, given the moderate scenic value of the area with notable urban fringe characteristics evident. Users of the canal and towpath are clearly engaged in recreational activities, and therefore considered to have a **High** susceptibility. Overall, their sensitivity is considered to be **Medium – High**.
- 3.13. There are predicted to be limited views towards the taller parts of the development proposals within the Site from some parts of the canal; however, it is also likely that these views will include built form within the FG Site beyond the Site.

Views from the North

- 3.14. There are no close-range and open views of the Site available from the north due to intervening residential built form within the Hillmorton area of Rugby. The presence of residential development fronting onto Barby Lane extending from the A428 serves to prevent Site visibility until approaching the Site's northern boundary.

Views from the East

- 3.15. Close-range views from the east are heavily filtered along the bridleway running alongside the Rugby Town Community Football Club (see **Appendix E**). There is potential intervisibility from the Oxford Canal Walk which is approximately 1 - 1.5km to the south-east of the Site; however, the intervening mature hedgerows and tree lined field boundaries interrupt long-distance views of the Site from this direction. Limited long-distance views are available from Rugby Road, on the more elevated ground, with the Site set within the context of the settlement edge of Hillmorton. Beyond 3km to the south-east the distance, the topography and intervening vegetation in the landscape are likely to prevent any intervisibility with the Site.

Views from the South

- 3.16. Close-range views from the south are available along Barby Lane and from the bridleway which extends passed Whitehall Farm, albeit views are intermittently filtered by roadside and field boundary vegetation. On the rising ground to the south of the Site (surrounding Barby and south of the M45) long-distance views can be gained towards the Site, however owing to the distance and elevation the view is expansive, showing the extent of the Hillmorton settlement edge which is fragmented by vegetation. The Site is a small component within the view.



Views from the West

- 3.17. Close-range views from the west are available from footpath (RB29) which runs parallel to Barby Lane and the Site's western boundary. Views of the Site are filtered by vegetation on the western boundary but can be gained further south from the open southern boundary up the sloping ground towards the urban edge of Hillmorton. Views further west from Onley Lane and from users of the cycleway in the Wildlife Trust's Ashlawn Cutting Local Nature Reserve are typically filtered by layers of trees and hedgerows in the foreground.

Summary

- 3.18. The Site benefits from a relatively limited visual envelope and no longer-range panoramic views towards the Site have been identified. The Site is visually well-contained by the urban edge of Hillmorton to the north, with existing two storey residential development adjoining the Site to the northern Site boundary. Furthermore, views of the Site from the east and west are also limited due to a combination of established hedgerows and mature trees and the topography of the area. Intervisibility with the Site is generally limited to:

Residents in the immediate vicinity orientated towards the Site and with overlooking views;

Other properties, including several farmsteads, to the south-east and south-west of the Site, including Brook Farm Cottage and Tower Farm. It is acknowledged that other properties to the south of the Site have the potential for limited intervisibility from their properties in winter, but these are very unlikely to be significant and have not been considered further in this report.

Users of the PRoW to the south of the Site within 1 - 2km distance; and

Vehicular users of Barby Lane, directly adjacent to the Site and users of the local road network for approximately 1 - 2km south of the Site.

4. Landscape Strategy.

4.1. A well-considered and sensitively design landscape strategy should inform any development proposals. This strategy should include Green Infrastructure proposals to reinforce the character of the local landscape. The mitigation measures should form an integral part of the proposals and must respect the local landscape character, integrating the scheme with landscape elements and characteristics of the surrounding landscape context and minimising visual effects. These measures can be summarised as follows:

Retention and protection of all important trees and hedgerows at the Site boundaries, with the exception of a section of hedgerow to be removed to obtain Site access, which will be replaced by native trees and hedgerow planting within the Public Open Space (POS) on Site. This will ensure the retention of these characteristic landscape elements for their intrinsic wildlife and visual amenity value and, given their screening effect, minimise the visual effects of the proposals on landscape and visual receptors in the Site context;

Set back of development from the southern Site boundary to provide space for new native landscape buffer planting to frame and filter views of the development from the particularly sensitive visual receptors to the south. New native hedgerow and tree planting should be introduced to strengthen the Site's southern boundary, and to provide landscape buffer to the Rains Brook Valley, whilst also contributing to a potential net gain in biodiversity. The proposed hedgerow will link with the wider mature landscape setting to support continuous green corridors for wildlife foraging;

Enhancements to vegetation along the western boundary, including tree management and cleaning out and gapping up of the hedge, to ensure the longevity of a healthy boundary that filters views to the proposals from the adjacent road;

Additional tree/hedgerow planting along the northern boundary to 'gap up' existing hedgerow in places and help to protect the privacy of the existing adjacent property;

Introduction of an area of public open space at the southern end of the Site, with proposed housing set back from the boundary and overlooking the open countryside to the south. It is proposed that this POS should be informal in character. The sloping nature of the Site also allows for this area to accommodate flood attenuation measures, which should be sensitively designed to contribute further to wildlife and visual amenity;

Street tree planting to be appropriate in term of species and locations to enhance the character of the built form and incidental open spaces, and to benefit wildlife. Trees within open spaces to be larger native species, such as oak, wherever possible, with smaller native species, such as birch and field maple, where space is restricted; and

Sensitive building layout with proposed properties set back to differing degrees and angles, notably adjacent to the areas of open space, to create a more informal, rural character in this edge of settlement location.



5. Summary & Conclusions.

- 5.1. This Landscape & Visual Technical Note has been prepared by Pegasus Group on behalf of Persimmon Homes West Midlands in respect of Land at Barby Lane, Hillmorton, Rugby, CV22 5QL. The Site is located within the administrative boundary of Rugby Borough Council. The Site is proposed as a draft allocation (Site 334) in the Preferred Options Report for circa 400 dwellings.
- 5.2. This Site is located at the settlement edge of Hillmorton and comprises a patchwork of small fields, divided and bounded by hedgerows and trees. Land cover is mostly pastoral with some arable areas. The Site also includes small ponds and commercial/agricultural buildings. The topography falls across the Site by approximately 15m from north to south. The Site is bordered by Barby Lane to the west and a private driveway to the south and east. Residential properties and a school border the Site to the north.
- 5.3. The Site is considered to have a per-urban character; however, it retains scenic some qualities despite its proximity to urban areas. Surrounding hedgerows and trees help to create a sense of enclosure. The landscape to the south is characterised by open countryside. There are no biodiversity designations or heritage assets within the Site, though the network of hedgerows and trees hold biodiversity value. The Site lacks public access and offers little recreational value.
- 5.4. Views from surrounding PRowWs are typically obscured by intervening vegetation. Views into the Site from Barby Lane are filtered by hedgerows and trees. Views into the Site from nearby Listed buildings and scheduled monuments in Hillmorton are screened by intervening buildings.
- 5.5. The Site is **not** considered to be a 'valued' landscape in accordance with Paragraph 187(a) of the NPPF. Overall, it is judged that the well-enclosed nature of the Site offers the capacity to accommodate residential development of type proposed (circa 380 dwellings).
- 5.6. The sensitivity of the landscape increases to the south of the Site with an overall **Medium** sensitivity. Higher density development should be introduced within the northern part of the Site and sensitively integrated with existing residential development at Hillmorton. Ideally, densities should reduce in the southern parts of the Site with dwellings facing onto an area of POS creating a landscape buffer with the Rains Brook Valley.



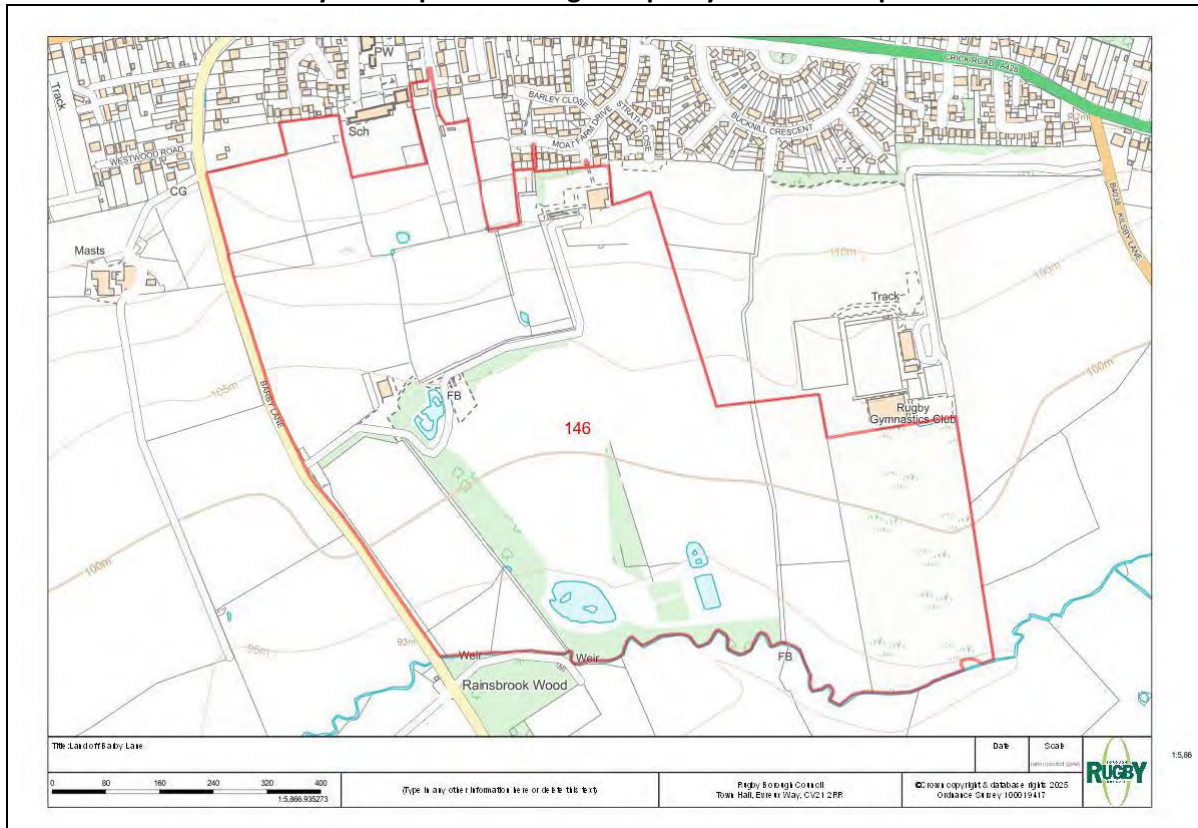
Appendix A:

Extract – HELAA Appendix 4 – Proforma Site 146

Site reference: 146

Land off Barby Lane

Conclusion: Not currently developable - changes to policy would be required.



Basic

Parish	Unparished	Ward	Hillmorton Ward
Current use	Agriculture / Commercial	Gross site area	58.4
Net site area	55.4	Proposed use	Residential
Potential yield (employment, sqm)	0	Potential yield (residential)	380
Green Belt/LGS	0%	Agricultural Land Classification	Grade 2 / Grade 3

Conclusions

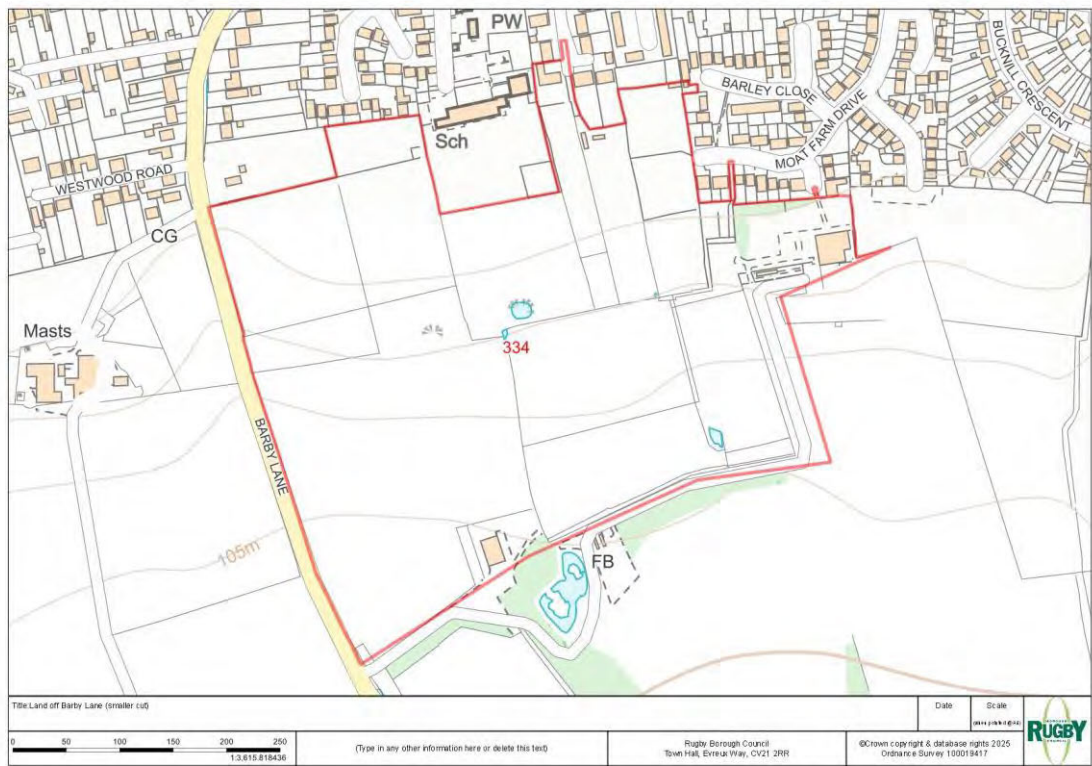
Available	yes - immediately
Achievable	Yes
Suitable	Potentially
Suitability commentary	Given the topography of the site the southern third could be utilised as a landscape buffer/biodiversity off-setting area. PROW runs through site. Within Air Quality Management Area. Within potential GI area - consider impacts. Part of site contains a Local Wildlife Site and a Potential Local Wildlife Site. Previous landscape study found Landscape Sensitivity - Medium (northern part) - 17i. High (southern part) - 14a. Surface water flooding occurs within southern portion of site. Landscape impact needs consideration. Further assessment required to determine sustainability of site.
Discounted?	False
Justification for discounting	



Appendix B:

Extract – Preferred Option Draft – Proforma Site 334

<p>Site ID: 334</p>	<p>Site name: Land off Barby Lane, Hillmorton</p>
<p>Site area: 19.22ha</p>	<p>Allocation: circa 400 dwellings</p>
<p>Development requirements:</p> <ul style="list-style-type: none"> Extension of pedestrian footway on Barby Lane to link to site entrance. Cycle and pedestrian connection required to Moat Farm Drive, Florin Place and Barley Close. Retention and reinforcement of existing tree belt on the site's southern boundary and retention and reinforcement of the hedgerow to Barby Lane. Creation of footpath to link to the footpath which runs alongside Rugby Borough Football Club. Development is to take into account the site's topography and avoid excessive retaining structures. This should be achieved through an east-west street pattern and dwellings facing north and south. If possible, pedestrian connections into Hillmorton Vale should be created. Provision of land for expansion of English Martyrs Primary School (if required). 	

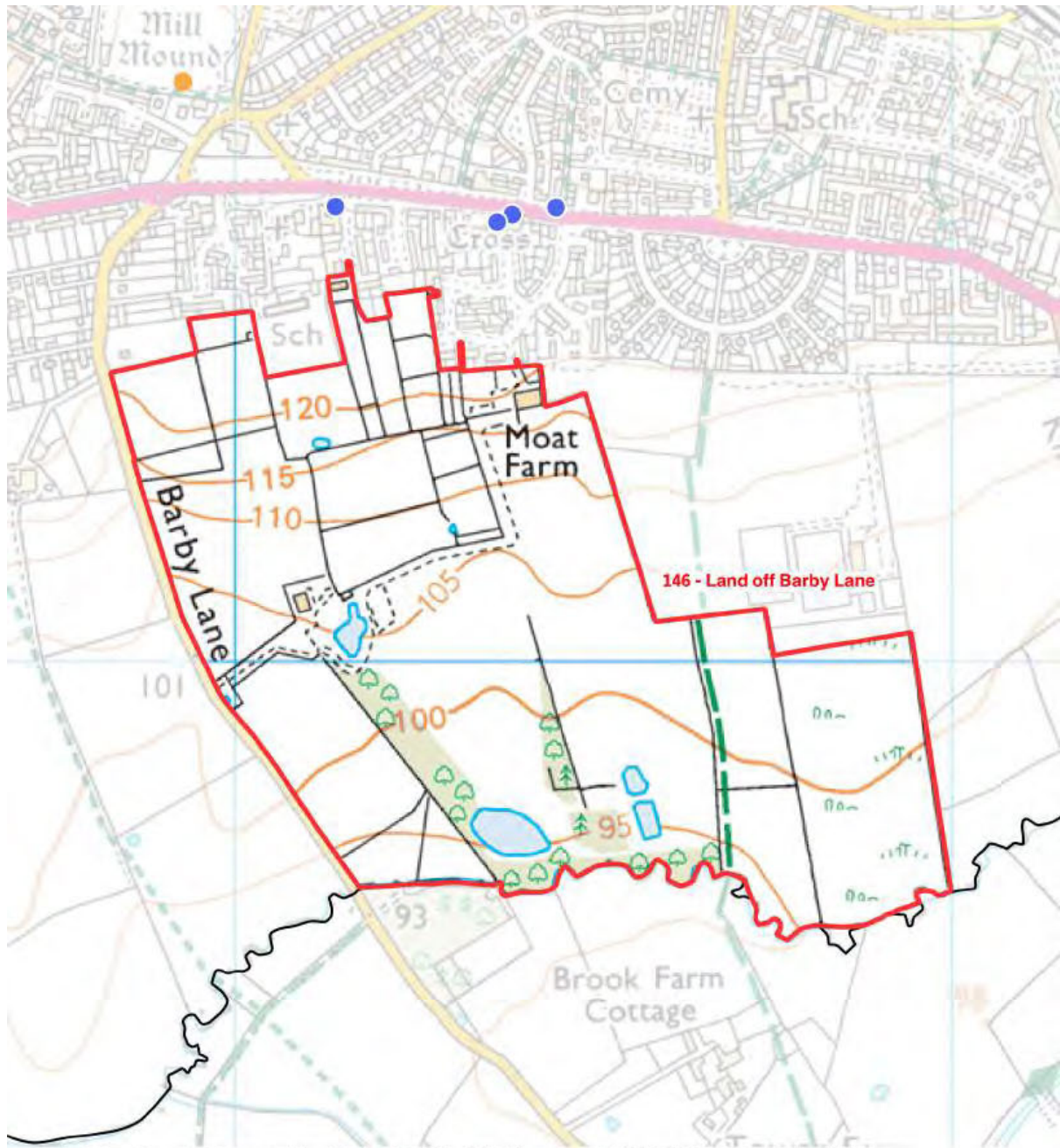




Appendix C:

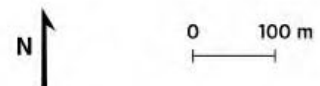
**Extract – Landscape Sensitivity Assessment of Strategic Site Options
– Proforma Site 146**

27 Site 146: Land off Barby Lane



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- 146 - Land off Barby Lane
- Rugby Borough
- Grade II listed building
- Scheduled Monuments



PROJECT	Rugby Landscape Sensitivity Assessment	DRAWN	WE
CLIENT	Rugby Borough Council	CHECKED	ND
TITLE	Strategic Site Option 146 - Land off Barby Lane	SCALE@A4	1:7000
VERSION	LC-1223_Site_146_1	DATE	18/03/2025

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Site reference	146
Site name	Land off Barby Lane
Location	Hillmorton
Site size	59.5
Development type	Residential
National Character Area	Dunsmore and Feldon
Landscape Character Area (Rugby LCA)	Dunsmore and Feldon
Landscape Character Type (Rugby LCA)	Dunsmore - Plateau Fringe and Feldon - Vale Farmlands
Date of site visit	9th October 2024

H	H/M	M	M/L	L
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Susceptibility		H	H/M	M	M/L	L
Landscape						
Scale and enclosure	The site is comprised of medium and small arable and pastoral fields. Fields are divided and bounded by hedgerows with trees, giving a strong sense of enclosure.				M/L	
Landform	Rising topography to the north of the site allows for expansive views across the site and surrounding landscape.			M		
Landcover (including biodiversity)	The site comprises pastoral fields, with a landscaping business located to the north. This business has landscaped the central lower field, creating a well-maintained and scenic environment. Woodland areas surround four waterbodies, while the easternmost field features scrub vegetation. Rains Brook runs along the southern boundary, where the flood zone extends approximately 50 meters into the site.				M/L	
Man-made influences	Barby Lane runs along the western boundary of the site. The A428 is located approximately 100m to the north of the site. Farm and employment development is located within the north of the site. The northern boundary lies adjacent to Hillmorton including residential dwellings. Rugby Borough Football Club is located to the east.				M/L	
Scenic quality and character	The site is situated at the urban fringe within a landscape of settlements and arable fields. Areas of woodland and waterbodies within the site add to the scenic quality and character.				M/L	
Remoteness and tranquillity	The site is located on the urban fringe, surrounded by a landscape of arable fields. It offers a high level of tranquillity, providing a peaceful environment.				M/L	
Visual						
Skylines and settings	From the PRoW, there are expansive scenic views of the surrounding landscape, featuring fields and trees. Wind turbines are also visible to the east.			M		
Movement	Wind turbines are present and visible from the PRoW to the east of the site, within the surrounding landscape. Vehicular traffic along the western boundary at Barby Lane is likely to be predominantly local and residential. The A428 is situated approximately 100 meters to the north.				M/L	

<p>Visibility, key views, vistas and typical receptors (both within and outside of each site)</p>	<p>Views from Barby Lane into the site are filtered through hedgerow and tree cover. It is likely that views into the site are also possible from the surrounding settlements. A PRoW (footpath) traverses the southwest portion of the site, with an additional footpath located approximately 200 meters from the site along the western boundary.</p>		<p>M/L</p>	
<p>Views to and from important landscape and cultural heritage features (both within and outside of each site)</p>	<p>No known cultural heritage features are located within the site. A cluster of Grade II listed buildings are located at High Street in Hillmorton to the north of the site. Scheduled monuments are present within Hillmorton including 'Round mound at Hillmorton' and 'Hillmorton Village Cross'. Views into the site from these heritage features are obscured by intervening buildings.</p>			<p>L</p>
<p>Value</p>				
<p>Landscape value</p>	<p>A PRoW runs through the site and another PRoW runs 200m from the western boundary. The PRoW through the site is likely of high local recreational value, connecting the site to the surrounding residential area of Hillmorton. The site holds no historic or cultural value.</p>		<p>M/L</p>	
<p>Visual value</p>	<p>A PRoW runs through the site, with an additional PRoW situated approximately 200m from the western boundary, allowing for views into the site. Views from Barby Lane are filtered through hedgerows and tree cover, while the gently undulating surrounding landscape offers uninterrupted views of fields, hedgerows, and trees, along with visible wind turbines, contributing to the area's high scenic value.</p>	<p>M</p>		
<p>Mitigation potential</p>				
<p>Views into the site could be further obscured by increasing planting of trees along the site boundaries.</p>				
<p>Overall landscape sensitivity (landscape, visual and value) of the site</p>				
<p>The site consists of fields enclosed by hedgerows and trees, situated at the urban fringe with settlements to the north. There are no known cultural heritage or historic features within the surrounding landscape. The site holds recreational value due to the presence of PRoWs both within and within 200 meters of the area. Expansive views of the surrounding landscape contribute to scenic quality, while high levels of tranquillity and a strong sense of enclosure create a peaceful environment. Overall, the landscape exhibits medium levels of sensitivity due to its scenic value, recreational opportunities, and tranquil atmosphere, indicating the need for careful management and consideration in any potential development or land-use changes.</p>		<p>M</p>		
<p>Additional comments</p>				
<p>The Rainsbrook 2017 Report²⁹ considers the northern-most area of the site a 'high-medium' sensitivity and northern areas of the site at 'high' sensitivity to housing development.</p>				

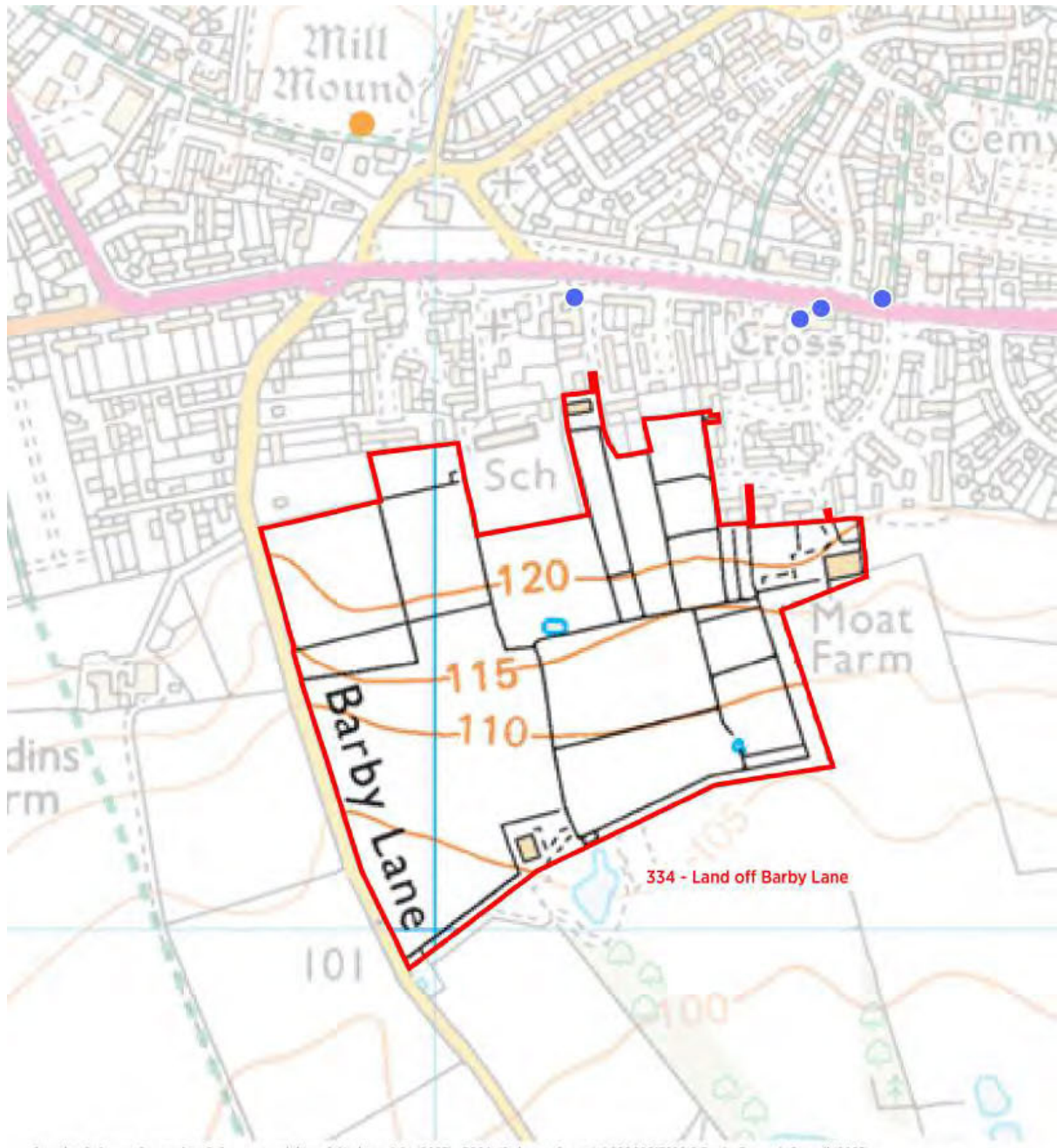
²⁹ Rainsbrook Valley Landscape Sensitivity Study (Warwickshire County Council, 2017) (covering the southern fringe of Rugby town)



Appendix D:

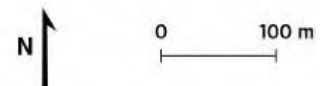
**Extract – Landscape Sensitivity Assessment of Strategic Site Options
– Proforma Site 334**

38 Site 334: Land off Barby Lane



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- 334 - Land off Barby Lane
- Grade II listed building
- Scheduled Monuments



PROJECT	Rugby Landscape Sensitivity Assessment	DRAWN	WE
CLIENT	Rugby Borough Council	CHECKED	ND
TITLE	Strategic Site Option 334 - Land off Barby Lane	SCALE@A4	1:5000
VERSION	LC-1223_Site_334_1	DATE	18/03/2025

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 www.lepusconsulting.com

Site reference	334
Site name	Land off Barby Lane
Location	Hillmorton
Site size	19.14
Development type	Residential
National Character Area	Dunsmore and Feldon
Landscape Character Area (Rugby LCA)	Dunsmore and Feldon
Landscape Character Type (Rugby LCA)	Dunsmore - Plateau Fringe and Feldon - Vale Farmlands
Date of site visit	9th October 2024

H	H/M	M	M/L	L
---	-----	---	-----	---

Susceptibility

Landscape				
Scale and enclosure	The site comprises a patchwork of small-scale fields, divided and bounded by intact hedgerows with trees which create a sense of enclosure.		M	
Landform	The topography rises from south to north, from approximately 105m AOD to 120m AOD.		M	
Landcover (including biodiversity)	Land cover across the site is mostly pastoral with some arable areas. Fields are divided and bounded by hedgerows with trees. Small ponds are present within the site.		M	
Man-made influences	The site is at the urban edge of Hillmorton, to the south of residential dwellings and a school (English Martyrs Catholic Primary School). Barby Lane runs along the western boundary of the site. A private driveway runs along the southern and eastern site boundaries. The A428 is located approximately 100m to the north of the site. Commercial/agricultural buildings are present within the site.		M	
Scenic quality and character	The site is situated at the urban fringe with development at Hillmorton to the north. Despite the presence of nearby roads and urban areas, the site retains scenic qualities due to the presence of open countryside to the south.		M	
Remoteness and tranquillity	The site is located on the urban fringe and remoteness levels are limited. However, tranquillity levels are generally good with hedgerows and trees creating a sense of enclosure from surrounding roads and built form.			M/L
Visual				
Skylines and settings	The skyline within and surrounding the site is defined by trees along field boundaries.			M/L
Movement	Movement levels within and surrounding the site are low. Views of moving vehicles along Barby Lane are substantially obscured by hedgerows and trees.			M/L
Visibility, key views, vistas and typical receptors (both within and outside of each site)	Views into the site from Barby Lane are filtered by hedgerows and trees. Residential properties and the English Martyrs Catholic Primary School to the north are likely to experience views into the site. There are no PROWs within the site. A footpath is located approximately 200m to the west and a bridleway is located approximately 250m to the east. Views into			M/L

	the site from these PRoWs are likely to be substantially obscured by intervening hedgerows and trees.		
Views to and from important landscape and cultural heritage features (both within and outside of each site)	No known cultural heritage features are located within the site. A cluster of Grade II listed buildings are located at High Street in Hillmorton to the north of the site. Scheduled monuments are present within Hillmorton including 'Round mound at Hillmorton' and 'Hillmorton Village Cross'. Views into the site from these heritage features are obscured by intervening buildings.		L
Value			
Landscape value	There are no biodiversity designations or heritage assets within the site. The network of hedgerows and trees within the site hold biodiversity value.		M/L
Visual value	The site is not publicly accessible. Views into the site from surrounding PRoW networks are likely to be substantially obscured by intervening vegetation. Views into the site from Barby Lane to the west are filtered by hedgerows and trees.		M/L
Mitigation potential			
Development would be better suited to the northern half of the site, to integrate with existing residential development at Hillmorton. Increasing tree planting along site boundaries can help to further reduce the visual impact of new residential buildings.			
Overall landscape sensitivity (landscape, visual and value) of the site			
This site is located at the settlement edge of Hillmorton and comprises a patchwork of small fields, divided and bounded by hedgerows and trees. Land cover is mostly pastoral with some arable areas. The site also includes small ponds and commercial/agricultural buildings. The topography rises across the site by approximately 15m from south to north. The site is bordered by Barby Lane to the west and a private driveway to the south and east. Residential properties and a school border the site to the north. The site retains scenic qualities despite its proximity to urban areas. Surrounding hedgerows and trees help to create a sense of enclosure. The landscape to the south is characterised by open countryside. The site lacks public access and views from surrounding PRoWs are likely to be substantially obscured by intervening vegetation. Views into the site from Barby Lane are filtered by hedgerows and trees. There are no biodiversity designations or heritage assets within the site, though the network of hedgerows and trees hold biodiversity value. Views into the site from nearby listed buildings and scheduled monuments in Hillmorton are obscured by intervening buildings.			M
Additional comments			
The Rainsbrook 2017 Report ³² considers the northern area of the site a 'high-medium' sensitivity and the central/southern area of the site at 'high' sensitivity to housing development.			

³² Rainsbrook Valley Landscape Sensitivity Study (Warwickshire County Council, 2017) (covering the southern fringe of Rugby town)

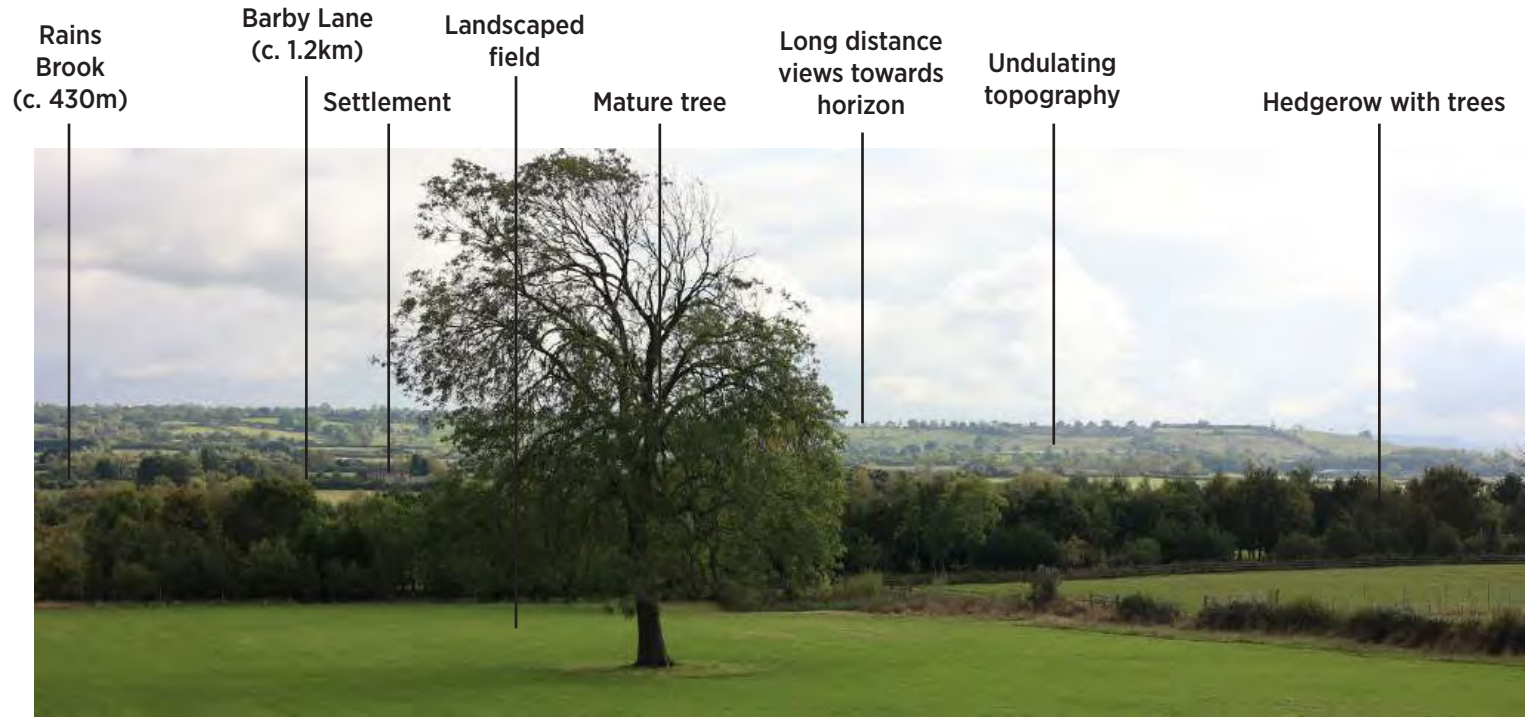
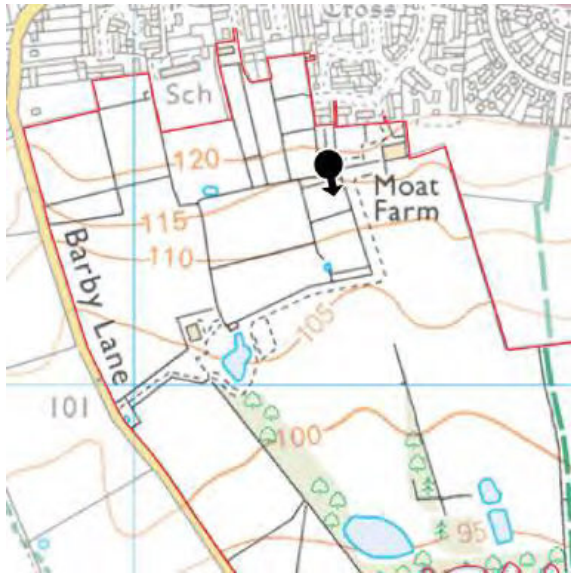


Appendix E:

Extract – Landscape Sensitivity Assessment of Strategic Site Options – Site Photography

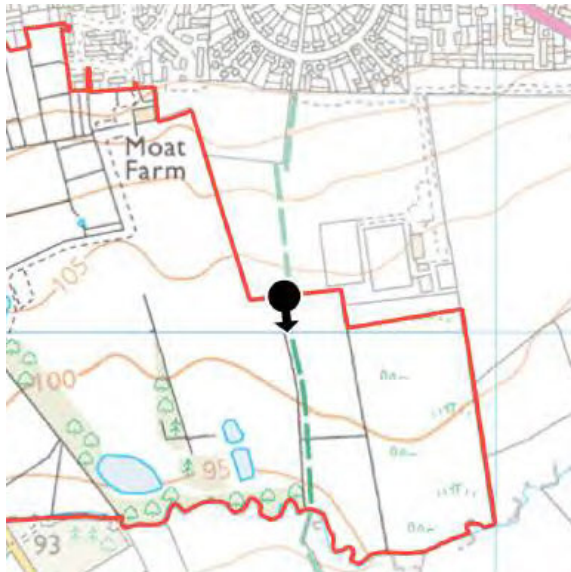
Land off Barby Lane (Site ref: 146 and 334)

View from car park



Land off Barby Lane (Site ref: 146)
PRoW: 333/RB28/1

View from bridleway



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Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates: Rugby Borough Council Proposed Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026
By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation in the subject line, OR by post to:** Development Strategy, Town Hall, Evreux Way, Rugby, CV21 2RR.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

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="Mr"/>
First Name	<input type="text" value="Thomas"/>	<input type="text" value="Jon"/>
Last Name	<input type="text" value="Strongman"/>	<input type="text" value="Goodall"/>
Job Title (where relevant)	<input type="text" value="Planner"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Persimmon Homes"/>	<input type="text" value="DLP Planning Ltd"/>
Address Line 1	<input type="text"/>	<input type="text" value="Priory Business Park"/>
Line 2	<input type="text"/>	<input type="text" value="4 Abbey Court"/>
Line 3	<input type="text"/>	<input type="text" value="Fraser Road"/>
Line 4	<input type="text"/>	<input type="text" value="Bedford"/>
Post Code	<input type="text"/>	<input type="text" value="MK44 3WH"/>
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:

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

Local Plan Paragraph		Local Plan Policy	EN3	Policies Map	
Site ID	334				

4. Do you consider the Local Plan:

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

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

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

Please see **Section 7.0 – Policy EN3 – Rainsbrook Valley Landscape of Elevated Sensitivity** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response) and the 'Landscape Sensitivity Assessment and Review of the Rainsbrook Valley' 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.

Please see **Section 7.0 – Policy EN3 – Rainsbrook Valley Landscape of Elevated Sensitivity** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response) and the 'Landscape Sensitivity Assessment and Review of the Rainsbrook Valley' 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:

DLP Planning Ltd have significant experience both in plan making and local plan examinations, especially in terms of the tests of soundness so their experience on these matters will be of assistance to the Inspectors.

The soundness issues raised in this objection are not stand alone but must be regarded as part of a wider objection to the Local Plan.

In order to full demonstrate the arguments raised in this objection and to appropriately test the soundness of the Local Plan, this will require attendance of suitably knowledgeable persons at the hearings.

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9. If you have used AI to produce or substantially alter your representation, please declare which tool you have used, how it was used, and what checks you have undertaken to ensure the AI-produced material is accurate.

N/A

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Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

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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="Mr"/>
First Name	<input type="text" value="Thomas"/>	<input type="text" value="Jon"/>
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Organisation (where relevant)	<input type="text" value="Persimmon Homes"/>	<input type="text" value="DLP Planning Ltd"/>
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Post Code	<input type="text"/>	<input type="text" value="MK44 3WH"/>
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:

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

Local Plan Paragraph		Local Plan Policy	H1	Policies Map	
Site ID	334				

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.

Please see **Section 8.0 – Policy H1 – Housing Mix** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see **Section 8.0 – Policy H1 – Housing Mix** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

(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:

DLP Planning Ltd have significant experience both in plan making and local plan examinations, especially in terms of the tests of soundness so their experience on these matters will be of assistance to the Inspectors.

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N/A

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Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

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Name of the Local Plan to which this representation relates: Rugby Borough Council Proposed Submission Local Plan

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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.*

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First Name	<input type="text" value="Thomas"/>	<input type="text" value="Jon"/>
Last Name	<input type="text" value="Strongman"/>	<input type="text" value="Goodall"/>
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Organisation (where relevant)	<input type="text" value="Persimmon Homes"/>	<input type="text" value="DLP Planning Ltd"/>
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Line 4	<input type="text"/>	<input type="text" value="Bedford"/>
Post Code	<input type="text"/>	<input type="text" value="MK44 3WH"/>
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:

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

Local Plan Paragraph		Local Plan Policy	I4	Policies Map	
Site ID	334				

4. Do you consider the Local Plan:

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

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

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Please see **Section 11.0 – Policy I4 – Infrastructure and Planning Obligations** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see **Section 11.0 – Policy I4 – Infrastructure and Planning Obligations** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

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

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

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N/A

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Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

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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="Mr"/>
First Name	<input type="text" value="Thomas"/>	<input type="text" value="Jon"/>
Last Name	<input type="text" value="Strongman"/>	<input type="text" value="Goodall"/>
Job Title (where relevant)	<input type="text" value="Planner"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Persimmon Homes"/>	<input type="text" value="DLP Planning Ltd"/>
Address Line 1	<input type="text"/>	<input type="text" value="Priory Business Park"/>
Line 2	<input type="text"/>	<input type="text" value="4 Abbey Court"/>
Line 3	<input type="text"/>	<input type="text" value="Fraser Road"/>
Line 4	<input type="text"/>	<input type="text" value="Bedford"/>
Post Code	<input type="text"/>	<input type="text" value="MK44 3WH"/>
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:

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

Local Plan Paragraph		Local Plan Policy	15	Policies Map	
Site ID	334				

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.

Please see **Section 12.0 – Policy 15 – New Railway Stations** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see **Section 12.0 – Policy 15 – New Railway Stations** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

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

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

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N/A

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Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

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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="Mr"/>
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Organisation (where relevant)	<input type="text" value="Persimmon Homes"/>	<input type="text" value="DLP Planning Ltd"/>
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Post Code	<input type="text"/>	<input type="text" value="MK44 3WH"/>
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:

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

Local Plan Paragraph		Local Plan Policy	S1	Policies Map	
Site ID	334				

4. Do you consider the Local Plan:

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

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

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

Please see **Section 4.0 – Policy S1 – Settlement Hierarchy** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see **Section 4.0 – Policy S1 – Settlement Hierarchy** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

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

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N/A

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1. Personal Details*

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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:

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

Local Plan Paragraph		Local Plan Policy	S2	Policies Map	
Site ID	334				

4. Do you consider the Local Plan:

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

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

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

Please see **Section 5.0 – Policy S2 – Strategy for Homes and Plan Period** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see **Section 5.0 – Policy S2 – Strategy for Homes and Plan Period** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

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

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

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

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1. Personal Details*

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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:

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

Local Plan Paragraph		Local Plan Policy	S6	Policies Map	
Site ID	334				

4. Do you consider the Local Plan:

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

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

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Please see **Section 6.0 – Policy S6 – Residential Allocations** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see **Section 6.0 – Policy S6 – Residential Allocations** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

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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)

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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:

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

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	334 – Site Selection and SA				

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.

Please see **Section 3.0 – Site Selection and Sustainability Appraisal** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

(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.

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

Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	H2	Policies Map	
Site ID	334				

4. Do you consider the Local Plan:

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

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

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Please see **Section 9.0 – Policy H2 – Affordable Housing** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

(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.

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

Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	H7	Policies Map	
Site ID	334				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	X	No	
(2) is Sound	Yes	X	No	
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Please see **Section 10.0 – Policy H7 – Housing Standards** in attached report (Barby Lane – Rugby Local Plan Reg 19 Response).

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