

## 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 13<sup>th</sup> March 2026**  
**By email to:** [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) with **Proposed Submission Consultation**  
**in the subject line, OR by post to:** Development Strategy, Town Hall, Evreux  
Way, Rugby, CV21 2RR.

This form has two parts –

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

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

### Part A

#### 1. Personal Details\*

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

#### 2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="John"/>	<input type="text"/>
Last Name	<input type="text" value="Tautu"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value=""/>	<input type="text"/>
Address Line 1	<input type="text" value=""/>	<input type="text"/>
Line 2	<input type="text" value=""/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text" value=""/>	<input type="text"/>
Post Code	<input type="text" value=""/>	<input type="text"/>
Telephone Number	<input type="text" value=""/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value=""/>	<input type="text"/>

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

Name or Organisation:

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

Local Plan Paragraph	Local Plan R19 Representation	Local Plan Policy		Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

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

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

As per attached representation.

(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.

As per attached representation.

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

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

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

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

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

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

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

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

- the soundness of the Plan's treatment of Lodge Farm / Site 73;
- any proposal to introduce or revive Lodge Farm through Main Modifications or other amendments during the examination process;
- the wording, extent and effectiveness of Policy EN3 relating to the Rainsbrook Valley landscape of elevated sensitivity

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

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

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

The Rugby Borough Council Privacy Notice for Development Strategy is available here: <https://www.rugby.gov.uk/w/privacy#development-strategy>

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

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

# **STAND AGAINST LODGE FARM VILLAGE (SALFV)**

## **REPRESENTATION TO THE RUGBY BOROUGH LOCAL PLAN PROPOSED SUBMISSION (REGULATION 19)**

**Representor:** Stand Against Lodge Farm Village (SALFV)

**Matter:** Soundness and legal compliance of the Proposed Submission Local Plan 2025–2042 in relation to Lodge Farm / Site 73 and Policy EN3 (Rainsbrook Valley Landscape of Elevated Sensitivity)

**Representation type:** Objection to any allocation or reintroduction of Lodge Farm; support for the submitted Plan insofar as it does not allocate Lodge Farm; request for strengthening of Policy EN3

**Hearing request:** Yes. SALFV requests the right to appear at the Examination in Public.

### **1. Introduction**

1.1 Stand Against Lodge Farm Village (“SALFV”) submits this representation in response to Rugby Borough Council’s Proposed Submission Local Plan (Regulation 19) consultation.

1.2 SALFV supports the submitted Local Plan insofar as it does not allocate Lodge Farm (Site 73) for development.

1.3 SALFV strongly objects to any proposal whether advanced through third-party representations, promoted modifications, or Main Modifications during the examination process to reintroduce or allocate Lodge Farm within the Plan.

1.4 SALFV further submits that Policy EN3 (Rainsbrook Valley Landscape of Elevated Sensitivity) should be strengthened so that it more accurately reflects the extent, character and setting of the Rainsbrook Valley landscape and ensures that the policy protection afforded to this landscape is consistent with the evidence base.

1.5 This representation is not a generalised objection to development or growth within Rugby Borough. Rather, it is a technical submission addressing the statutory tests of legal compliance and soundness, with particular regard to:

- the proper interpretation of the Council’s own evidence base;
- the consistency of the submitted Plan with the conclusions of that evidence;
- the continuing material weight of the previous Local Plan Inspector’s findings concerning Lodge Farm; and
- the need to safeguard a coherent and sensitive landscape corridor of acknowledged value.

1.6 The purpose of this submission is therefore to assist the Inspector by setting out why the exclusion of Lodge Farm from the submitted Plan is both justified and necessary, and why any attempt to reintroduce the site would undermine the soundness of the Plan.

## **2. Summary of SALFV's Position**

2.1 SALFV submits that the Council's decision not to allocate Lodge Farm in the submitted Local Plan is correct and fully supported by the available evidence.

2.2 The Council's own evidence base consistently demonstrates that Lodge Farm:

- is not required to deliver the spatial strategy or housing requirement of the Plan;
- remains affected by significant transport and accessibility constraints, including longstanding concerns regarding sustainable transport provision and the potential for increased traffic impacts in surrounding settlements;
- would require exceptionally substantial infrastructure investment in order to function as a settlement, raising serious concerns regarding viability and deliverability;
- sits within, and would fundamentally alter, a coherent valley landscape which the Council's landscape evidence identifies as possessing good landscape value and high sensitivity to major residential development; and
- would continue to give rise to material landscape harm even when mitigation measures are applied, as confirmed by the Council's own landscape assessment work.

2.3 In those circumstances, any attempt to allocate Lodge Farm would fail to meet the statutory tests of soundness set out in the National Planning Policy Framework. In particular, such an allocation would not be:

- Justified, because the Plan strategy can clearly be delivered without the site and because more appropriate and less harmful alternatives exist;
- Effective, because the evidence demonstrates serious unresolved concerns regarding infrastructure delivery, transport impacts and viability; or
- Consistent with national policy, which requires plans to promote genuinely sustainable development while protecting valued landscapes and ensuring that infrastructure requirements can realistically be delivered.

2.4 SALFV therefore respectfully invites the Inspector to:

- support the Council's decision to exclude Lodge Farm from the submitted Plan;
- reject any representation or modification seeking to introduce Lodge Farm as a strategic allocation; and
- ensure that the Plan properly reflects the Council's landscape evidence through a strengthened and effective Policy EN3.

### **3. Regulation 19 Context**

3.1 At the Regulation 19 stage, the issue before the Inspector is not whether Lodge Farm can be presented attractively as a conceptual or “vision-led” settlement proposal.

3.2 The task of the examination is instead to determine whether the submitted Local Plan is legally compliant and sound, and whether any proposal to introduce Lodge Farm would satisfy the statutory and policy tests governing plan examination.

3.3 In particular, the Inspector must consider whether the Plan, with or without any proposed modification, would meet the tests of soundness set out in the National Planning Policy Framework, namely whether it is:

- positively prepared,
- justified,
- effective, and
- consistent with national policy.

3.4 Regulation 19 consultation therefore concerns the soundness of the submitted strategy, rather than providing a fresh opportunity to promote alternative spatial strategies based on aspirational masterplans or conceptual development frameworks.

3.5 SALFV’s position is that the submitted Plan is materially stronger and more robust precisely because Lodge Farm has not been included.

3.6 The Council’s evidence base demonstrates that the Plan’s spatial strategy can be delivered without the site and that the strategic infrastructure necessary to support growth within the borough can be secured through alternative allocations already contained within the Plan.

3.7 The relevant question for the examination is therefore whether the Council’s decision not to allocate Lodge Farm is justified by the evidence, rather than whether the site could theoretically be developed under different assumptions.

### **4. Previous Inspector Findings Remain Highly Material**

4.1 Lodge Farm is not a new or untested strategic option. The site was previously considered through the statutory Local Plan examination process and was rejected by the previous Local Plan Inspector.

4.2 The conclusions reached in that examination remain a highly material consideration in assessing the soundness of any attempt to reintroduce the site.

4.3 The Council’s Sustainability Appraisal explicitly records the findings of the previous examination. In particular, it notes that the earlier Inspector concluded that development at Lodge Farm would result in:

- relatively poor accessibility, particularly by non-car modes;
- significant adverse effects on the landscape;
- harm to heritage assets; and

- that the allocation was unnecessary because the Plan could meet its housing requirements without the site.

4.4 The Sustainability Appraisal goes further and concludes that “the great majority of the concerns raised remain entirely applicable at the current time.”

4.5 This is a significant and telling conclusion within the Council’s own evidence base. It confirms that the principal planning concerns which led the previous Inspector to reject Lodge Farm have not materially diminished.

4.6 In circumstances where a development option has previously been rejected through the statutory plan examination process, principles of consistency in planning decision-making require that those earlier conclusions be given substantial weight unless it can be demonstrated that material circumstances have changed.

4.7 This does not amount to *res judicata* in the strict private-law sense. However, it is well established in planning law that earlier planning decisions on materially similar issues are capable of being a significant material consideration, and that a decision-maker departing from them must provide clear and cogent reasons for doing so.

4.8 Accordingly, the evidential burden lies with any party seeking to promote Lodge Farm to demonstrate that material changes in circumstances have fundamentally altered the planning balance which previously led to the site’s rejection.

4.9 On the evidence now before the examination, that threshold has not been met.

4.10 The Council’s own evidence base continues to identify significant concerns relating to transport accessibility, landscape harm, infrastructure provision and viability. These concerns mirror the issues previously identified by the Inspector and reinforce the conclusion that the site remains unsuitable for allocation.

4.11 SALFV therefore submits that the earlier Inspector’s findings remain a powerful and highly material consideration, and that the evidence now available provides no credible basis for departing from those conclusions.

## **5. Lodge Farm Is Not Required to Deliver the Plan Strategy**

5.1 A central and highly material consideration in the present examination is that the submitted Local Plan does not rely upon Lodge Farm in order to deliver its spatial strategy, housing requirement, or strategic infrastructure framework.

5.2 The Council has therefore already demonstrated, through the preparation and submission of the Plan itself, that a coherent and deliverable development strategy for the borough can be achieved without allocating the site.

5.3 This conclusion is expressly supported by the Council’s own evidence base. The Sustainability Appraisal records that the strategic growth strategy centred on South West Rugby is capable, in its own right, of delivering the transport and education infrastructure required to support development in this part of the borough. It follows

that “the Lodge Farm allocation is not needed to support the infrastructure requirements of the borough.”

5.4 That conclusion has important implications for the assessment of soundness. In some circumstances, a highly constrained development site may be advanced on the basis that it is necessary in order to meet objectively assessed development needs or to enable the delivery of essential infrastructure.

5.5 That is not the position here. The Council’s own analysis demonstrates that the Plan strategy is capable of functioning effectively without Lodge Farm, and that the key strategic infrastructure elements can be delivered through other allocations already contained within the Plan.

5.6 In those circumstances, the justification for allocating a site with substantial environmental, infrastructure and deliverability concerns becomes significantly weaker. Lodge Farm is not a necessary but challenging allocation required to make the Plan work. Rather, it is a strategically unnecessary site which gives rise to multiple planning concerns.

5.7 Once that position is recognised, the evidential burden placed upon any promoter of Lodge Farm becomes considerably heavier. It is not sufficient to demonstrate that the site could theoretically accommodate development under an alternative concept plan or settlement vision.

5.8 Instead, it would be necessary to demonstrate that allocating Lodge Farm represents the most appropriate strategy when considered against the reasonable alternatives, notwithstanding the substantial constraints identified in the evidence base.

5.9 The available evidence does not support such a conclusion.

## **6. Lodge Farm Is Not Convincingly Effective or Deliverable**

6.1 Lodge Farm is also highly vulnerable when assessed against the “effective” limb of the soundness test, which requires Local Plan allocations to be deliverable over the plan period and supported by effective infrastructure provision.

6.2 The Council’s Sustainability Appraisal describes Lodge Farm as a potential “new settlement option” but identifies transport as “a major issue”, noting that the site would require substantial transport interventions whose “achievability, suitability and viability” are described as “highly questionable.”

6.3 That conclusion alone gives rise to serious doubt as to whether the site could realistically be delivered in a timely and coordinated manner consistent with the Plan period.

6.4 The Appraisal also records a striking viability conclusion, stating that “Lodge Farm is a long way from being a viable proposition even at 0% affordable housing.”

6.5 That assessment is highly significant. It indicates that even when one of the principal policy obligations associated with major residential development namely the delivery of affordable housing is entirely removed, the site still struggles to demonstrate a viable development model.

6.6 This is not the language of a site which is close to being deliverable subject to normal policy requirements. Rather, it is the language of a site whose development prospects are fundamentally challenged by the scale of infrastructure and mitigation required in order for it to function as a settlement.

6.7 The Sustainability Appraisal further cautions against repeating “mistakes of the past” whereby strategic allocations with significant viability challenges ultimately fail either to deliver the anticipated development or to provide the infrastructure and policy benefits that originally justified their allocation.

6.8 SALFV submits that Lodge Farm is precisely the type of site to which that warning applies. The scale of infrastructure required to overcome the site’s inherent constraints creates a substantial risk that development would either fail to proceed at the anticipated scale or would do so only by eroding key policy objectives, including the provision of affordable housing and infrastructure.

6.9 In those circumstances, the allocation of Lodge Farm would be difficult to reconcile with the requirement in national policy that Local Plans should be deliverable, realistic and capable of being implemented over the plan period.

## **7. The Infrastructure Burden Is Extraordinary and Undermines Viability**

7.1 The promoter’s case for Lodge Farm relies heavily on the proposition that development at a sufficiently large scale can support the infrastructure required to function as a new settlement.

7.2 In essence, the argument advanced is that a larger development incorporating schools, local centres, internal trip generation and enhanced transport provision can create a critical mass capable of sustaining the necessary infrastructure.

7.3 However, the evidence before the examination demonstrates that increasing the scale of the development does not resolve the fundamental constraints affecting the site. On the contrary, it intensifies the infrastructure burden and exacerbates the viability challenges already identified.

7.4 The Council’s Sustainability Appraisal notes that the enlarged development concept is intended to support the delivery of a secondary school and enhanced bus services. Nevertheless, the same assessment concludes that viability remains a major concern and that “Lodge Farm is a long way from being a viable proposition even at 0% affordable housing.”

7.5 The Appraisal also records a wider concern regarding strategic-scale allocations, noting that such developments “may not be able to viably absorb the additional infrastructure required” while simultaneously delivering policy requirements such as

affordable housing, education provision, transport mitigation and other planning obligations.

7.6 These observations are highly significant. They indicate that the scale of infrastructure required to make the development function rather than strengthening the case for the site creates a substantial risk that the development would be unable to viably deliver the very infrastructure that is said to justify it.

7.7 SALFV's earlier submissions identified similar concerns in more site-specific terms, including the exceptional costs associated with integrating development across the A45 corridor, a major piece of highway infrastructure which currently divides the site. The need to provide safe crossings, traffic management measures, and the wider highway interventions necessary to integrate both sides of the scheme would inevitably add to the already substantial infrastructure burden.

7.8 Those site-specific concerns further reinforce the broader conclusion reached in the Sustainability Appraisal: namely that the scale of infrastructure required to enable the development creates serious and unresolved viability risks.

7.9 Even without relying upon SALFV's own analysis of infrastructure costs, the Council's own evidence base is sufficient to establish the point. Lodge Farm cannot properly be described as an infrastructure-led opportunity. Rather, it is a site whose infrastructure requirements are so substantial that they threaten the deliverability and viability of the development itself.

## **8. The Transport Case Remains Fundamentally Weak**

8.1 Transport and accessibility concerns lie at the heart of the case against the allocation of Lodge Farm.

8.2 The site continues to suffer from the same fundamental accessibility issues that were identified by the previous Local Plan Inspector.

8.3 As recorded in the Sustainability Appraisal, the earlier Inspector concluded that the site exhibited relatively poor accessibility, particularly by non-car modes, and those concerns remain a key feature of the current evidence base.

8.4 The promoter's response has not been to demonstrate that the site is inherently well located in relation to existing sustainable transport networks. Instead, the case advanced relies heavily upon the introduction of extensive new transport interventions and the application of a "Vision-led Planning Tool" which is said to reduce conventional traffic forecasts.

8.5 Such an approach does not address the underlying locational issue. The existence of an aspirational modelling framework designed to encourage lower levels of car use is not the same as demonstrating that the site is intrinsically well related to existing public transport corridors, established walking and cycling networks, or nearby centres of employment and services.

8.6 In effect, the promoter's case attempts to make an inherently constrained location appear acceptable through optimistic modelling assumptions and future interventions, rather than through evidence that the site already possesses the characteristics normally associated with sustainable strategic growth locations.

8.7 This concern is reinforced by the Council's own Sustainability Appraisal, which continues to identify transport as a major issue and states that the proposed mitigation measures raise serious questions regarding their achievability, suitability and viability.

8.8 In those circumstances, the transport evidence does not support the conclusion that Lodge Farm represents a sustainable or deliverable strategic allocation within the Plan period.

## **9. Dunchurch Remains a Major Unresolved Pressure Point**

9.1 Dunchurch remains one of the clearest and most tangible manifestations of the transport weakness inherent in the Lodge Farm proposal.

9.2 The significance of Dunchurch is not merely local or anecdotal. It is expressly recognised within the Council's own evidence base as a location where the consequences of strategic growth choices become operationally visible.

9.3 The Sustainability Appraisal accepts that a larger Lodge Farm scheme might, in principle, assist in securing enhanced public transport provision between Rugby, Lodge Farm, Dunchurch and Daventry. However, it nonetheless concludes that "major concerns would still remain regarding how to avoid problematic traffic through Dunchurch."

9.4 That conclusion is highly significant. It demonstrates that even after allowing for the promoter's enlarged, infrastructure-led case and even after taking account of the prospect of additional bus provision the Council's own assessment still identifies Dunchurch as a serious and unresolved transport constraint.

9.5 This is not a marginal weakness that can be left to later detailed design work. It goes directly to the soundness of the site as a strategic allocation. A strategic site whose transport case still leaves major unresolved concerns over the routing, concentration, or displacement of traffic through an already sensitive village environment cannot properly be regarded as a reliable or effective component of the Plan strategy.

9.6 The point is strengthened when considered cumulatively. Dunchurch does not sit in a static or unconstrained context. It already lies within the sphere of influence of major planned growth and infrastructure delivery associated with the wider south-western Rugby corridor. In those circumstances, the question is not whether Lodge Farm in isolation might produce some additional pressure, but whether it is reasonable or sound to impose a second major strategic burden on the same broad movement corridor and settlement context.

9.7 SALFV's earlier submissions addressed this in greater factual detail, identifying cumulative pressure on Dunchurch itself and on the wider corridors connecting it to Rugby and surrounding strategic routes. That broader point remains valid: where a village is already affected by the consequences of strategic growth elsewhere in the Plan, the addition of a further strategic-scale proposal in the same broad area materially increases the risk of congestion, rat-running, degraded amenity, and erosion of settlement character.

9.8 Dunchurch is not simply a transport node. It is a historic village whose character, functionality and setting are sensitive to further urbanising pressure. Even where particular impacts may be expressed in transport terms, their consequences are wider: increased traffic through Dunchurch would not merely affect delay and junction performance, but would also intensify pressure on the village environment, movement quality, safety, tranquillity and overall heritage setting.

9.9 For Regulation 19 purposes, the essential point is therefore this: if the transport solution for Lodge Farm still leaves the Council with major unresolved concerns over Dunchurch, then the site cannot properly be described as a robust, effective or justified strategic allocation.

## **10. South West Rugby Already Carries the Strategic Infrastructure Role**

10.1 The promoter's broader strategic case for Lodge Farm depends heavily on the proposition that only development at substantial scale can viably support strategic infrastructure.

10.2 That proposition is answered, both as a matter of strategy and evidence, by the submitted Plan itself.

10.3 The Council has already identified South West Rugby as the principal strategic growth location through which transport and education infrastructure in this part of the borough is to be delivered. The Sustainability Appraisal expressly records that South West Rugby can itself deliver the strategic transport and education infrastructure needed to support that development, including the relevant link-road and school functions, and that Lodge Farm is not required for those purposes.

10.4 That point is of central importance. It means that Lodge Farm is not needed to unlock the strategic infrastructure serving this part of Rugby Borough. The core strategic role is already being performed elsewhere within the submitted Plan.

10.5 Once that is recognised, the promoter's case is materially weakened. Lodge Farm ceases to be capable of being characterised as a necessary strategic companion allocation. Instead, it is revealed for what it is in plan-making terms: a promoter-led attempt to introduce a second major strategic burden into a corridor that is already expected to absorb substantial growth, infrastructure delivery and associated movement impacts.

10.6 That cumulative context matters. South West Rugby already represents a significant commitment of land, infrastructure, traffic movement and service provision within the wider south-western area of Rugby. To add Lodge Farm to that same broad strategic geography would not amount to a balanced or necessary reinforcement of the submitted strategy. It would amount to an intensification of pressure in an area already carrying major strategic obligations.

10.7 This is particularly relevant in relation to Dunchurch and its surrounding routes. Where one strategic allocation is already expected to deliver major link-road and school infrastructure, the argument that a second major allocation is also needed in the same broad area becomes considerably harder to sustain—especially where the evidence shows that the second site is more constrained, more landscape-sensitive, and less convincingly deliverable.

10.8 Put simply, the submitted Plan already has a strategic growth mechanism for this part of the borough. That mechanism is South West Rugby. The evidence does not support the proposition that Lodge Farm is required in addition.

10.9 The fact that Warwickshire County Council may express a broad preference, in strategic terms, for larger growth nodes does not answer the actual examination question. The question is not whether large sites can sometimes be beneficial in principle, but whether this particular site, in this particular location, is justified, deliverable, effective, and acceptable when tested against the evidence.

10.10 On the Council's own evidence, it is not.

## **11. The Rainsbrook Valley Is a Coherent Landscape of Good Value and High Sensitivity**

11.1 The Rainsbrook Valley Landscape Sensitivity Assessment, prepared by Node on behalf of Rugby Borough Council, forms a central and authoritative component of the evidence base relevant to the Lodge Farm proposal.

11.2 The Assessment makes clear that the Rainsbrook Valley should be understood and evaluated as a coherent landscape system, rather than as a series of unrelated field parcels. It emphasises that landscape value and sensitivity are rarely understood accurately when assessed on a field-by-field basis, because the qualities that give landscapes their character typically arise from their collective form, landform, visibility and experiential qualities.

11.3 This conclusion is particularly important in the present context because it directly undermines any attempt to characterise Lodge Farm as a discrete parcel that can be assessed independently of the wider valley landscape. The Assessment demonstrates that the valley functions as a single landscape receptor, meaning that development in one part of the valley inevitably affects the perception and integrity of the valley as a whole.

11.4 In its evaluation of landscape value, Node concludes that the Rainsbrook Valley possesses sufficient scenic, recreational and amenity qualities to be regarded as a landscape of “good” value.

11.5 The Assessment further concludes that:

- the valley exhibits high susceptibility to major housing development, and
- across the majority of the valley, overall landscape sensitivity is high, because the introduction of urbanising forms would be widely visible and would fundamentally alter the existing rural character.

11.6 These findings carry considerable weight. They are not the opinions of an objector or promoter but the conclusions of the Council’s own commissioned landscape specialist, prepared as part of the formal evidence base underpinning the Local Plan.

11.7 SALFV submits that this evidence strongly supports the Council’s decision not to allocate Lodge Farm. The Node Assessment demonstrates that large-scale residential development within the Rainsbrook Valley would give rise to landscape effects that are both substantial and structurally difficult to mitigate, precisely because of the valley’s coherent form and sensitivity.

## **12. The Local Topography Does Not Reduce Harm; It Explains Why Harm Would Be So Severe**

12.1 It might superficially be suggested that the proximity of Rugby’s southern edge, together with the presence of other built features within the wider landscape, indicates that the valley is capable of accommodating additional development.

12.2 The Node Assessment expressly considers and rejects that proposition. It explains that although aerial or map-based analysis might suggest potential development capacity, the local topography and valley landform mean that existing urban edges are largely concealed from many viewpoints within the valley itself.

12.3 As a consequence, the Rainsbrook Valley is widely experienced on the ground as a distinct rural landscape, visually and perceptually separate from the built form of Rugby.

12.4 It is precisely this characteristic that makes the landscape particularly sensitive to major housing development. New residential development introduced within the valley would not read as a modest or incremental urban extension. Instead, it would appear as conspicuous urbanising form within a landscape currently experienced as open countryside.

12.5 The Assessment indicates that this effect would arise not only within the valley floor and southern slopes but also along the northern valley slopes nearer to Rugby, where development could present as a prominent and visually continuous new settlement edge or as cascading built form descending into the valley.

12.6 The resulting change would therefore be experienced across a wide range of viewpoints and landscape receptors, including public rights of way, elevated land surrounding the valley and longer-distance vantage points.

12.7 These findings provide a clear and evidence-based response to any suggestion that the land within the Lodge Farm site—particularly areas closer to Ashlawn Road—can be treated as inherently lower in landscape sensitivity simply because it lies nearer to the existing urban edge.

12.8 The Council's own landscape evidence demonstrates that the valley's landform and visibility patterns mean that development in these locations would still be visually prominent and landscape-defining, rather than assimilated as a conventional urban edge extension.

### **13. Even After Mitigation, the Landscape Harm Remains Material**

13.1 The Council's post-mitigation landscape testing, undertaken by Lepus Consulting, is of particular importance when assessing the robustness of the Lodge Farm proposal.

13.2 Lepus was asked to review the Lodge Farm option in light of the promoter's updated material, including the promoter's landscape note and vision-led masterplanning documentation. The purpose of that exercise was to test whether the additional landscape mitigation measures advanced by the promoter materially altered the earlier landscape conclusions.

13.3 In carrying out this exercise, Lepus explicitly considered a range of proposed mitigation interventions, including:

- strengthened and enhanced field boundary vegetation;
- additional tree planting and taller landscape buffers;
- extensive green infrastructure provision;
- the incorporation of sports pitches and open space;
- retained ecological corridors; and
- associated structural landscaping across the site.

13.4 Even after taking these measures fully into account, Lepus concluded that significant landscape effects would remain. In particular, the assessment records that:

- the development would still alter the largely undeveloped skyline of the valley landscape;
- extensive views from public footpaths and the Oxford Canal Walk would be affected;
- long-distance views from elevated land between Barby and Braunston would also be altered; and
- the large-scale residential character of the proposed settlement would remain in clear contrast with the rural and scenic qualities of the Feldon Vale Farmlands landscape character area.

13.5 Crucially, even after this mitigation testing exercise, the overall landscape score remained at “M”.

13.6 This finding is highly significant. It demonstrates that even after incorporating the promoter’s landscape mitigation strategy, the Council’s independent landscape assessment still identifies material landscape harm.

13.7 The implication is clear. The landscape issue is not simply a matter of insufficient planting or boundary treatment that could be addressed through design refinements. Rather, the scale, form and visibility of the proposed development are fundamentally at odds with the character of the valley landscape.

13.8 SALFV therefore submits that the Council’s own post-mitigation evidence demonstrates that the landscape impacts of Lodge Farm remain substantial and structurally difficult to mitigate, even when the promoter’s proposed mitigation package is fully taken into account.

#### **14. The Promoter’s “Bigger Site” Solution Intensifies the Landscape Harm**

14.1 The promoter’s central response to earlier concerns has been to promote a larger and more comprehensive development concept, spanning both sides of the A45 and incorporating schools, neighbourhood centres, transport interventions and extensive green infrastructure.

14.2 The implicit argument is that the site should now be assessed differently because its increased scale allows for a more “complete” settlement structure capable of supporting services, open space and internal movement patterns.

14.3 However, the landscape evidence demonstrates that increased scale does not resolve the site’s fundamental landscape constraints. On the contrary, it is part of the problem.

14.4 The Lepus post-mitigation assessment expressly identifies the large-scale nature of the residential proposals as a key reason why the development would remain in conflict with the rural and scenic character of the Feldon Vale Farmlands landscape.

14.5 Similarly, the Node Landscape Sensitivity Assessment concludes that major housing development within the valley would be visually prominent and incongruous across a wide area, because of the valley’s open character, topography and visibility patterns.

14.6 In other words, the very scale that is relied upon to support infrastructure provision also magnifies the landscape impact. Larger development footprints, more extensive settlement edges and greater built mass would inevitably increase the degree to which urbanising form is introduced into the valley landscape.

14.7 SALFV therefore submits that the promoter’s enlarged masterplan does not overcome the landscape objections previously identified. Instead, it intensifies one of the site’s principal defects, namely the introduction of large-scale urban form into a

landscape that the Council's own evidence base identifies as having high sensitivity to such development.

## **15. The A45 Is a Strategic Severance Constraint, Not a Natural Settlement Spine**

15.1 The promoter's current concept relies upon development extending across both sides of the A45, with the intention that the road corridor would ultimately function as a central element within a new settlement.

15.2 However, the A45 is not a local distributor road capable of acting as a natural settlement spine. It is a strategic highway corridor, designed to carry high volumes of regional traffic at speed and to function as a principal east-west route within the wider highway network.

15.3 The promoter's own material acknowledges that the treatment, speed environment and configuration of the A45 corridor would require significant alteration if the proposed development is to function as a coherent place. This includes proposals to modify the character of the corridor and to introduce substantial crossing infrastructure in order to mitigate severance.

15.4 The need for such intervention is itself revealing. Where a strategic site is naturally suited to development, the surrounding highway network typically supports rather than constrains settlement structure. In this case, the development concept depends upon overcoming a pre-existing strategic barrier.

15.5 The A45 therefore represents a fundamental severance constraint, rather than a logical organising feature for a new settlement. Without major intervention, it would divide the development into two distinct parts; with such intervention, it generates significant engineering complexity, cost and delivery risk.

15.6 The necessity of physically "stitching" development across a strategic highway corridor also contributes directly to the exceptional infrastructure burden already identified within the Council's own evidence base, further exacerbating the viability concerns highlighted in the Sustainability Appraisal.

15.7 SALFV therefore submits that the A45 is not a neutral feature within the Lodge Farm concept. It is a structural constraint that undermines the site's suitability as a strategic allocation, reinforcing the conclusion that Lodge Farm represents a fundamentally compromised location for major growth.

## **16. The Rainsbrook Valley Possesses Substantial Cultural, Recreational and Scenic Value**

16.1 The landscape case concerning the Rainsbrook Valley does not rest solely on scenic quality or visual appearance. The valley's value is also derived from a broader set of cultural, recreational and experiential attributes that contribute to its importance within the borough's landscape structure.

16.2 The Node Landscape Sensitivity Assessment identifies a significant cultural heritage dimension within the valley landscape. This includes the presence and influence of designated heritage assets, Registered Parks and Gardens, Scheduled Monuments and historic landscape features which collectively contribute to the historic character and setting of the valley.

16.3 These heritage components are not isolated artefacts but form part of the wider historic landscape framework through which the valley has evolved. The relationship between landform, historic routes, settlement patterns and surrounding countryside contributes materially to the valley's character and sense of place.

16.4 The Assessment also records that the valley supports notably strong recreational use, with an established network of public rights of way, including footpaths and bridleways that provide extensive opportunities for public access and landscape appreciation.

16.5 These routes allow residents and visitors to experience the valley landscape directly and contribute to its amenity value, reinforcing its role as an accessible countryside resource within the wider Rugby area.

16.6 The supporting commentary associated with Policy EN3 further highlights that the broader Rainsbrook Valley landscape performs strongly in terms of cultural heritage value, recreational function, landscape distinctiveness and scenic character, including areas lying beyond the currently defined policy boundary.

16.7 SALFV therefore submits that the Rainsbrook Valley should properly be regarded as a valued and coherent landscape corridor, providing cultural, recreational and environmental functions that extend well beyond its visual qualities alone.

16.8 In these circumstances, the valley cannot reasonably be characterised as reserve land for strategic housing growth. The Council's own evidence demonstrates that it performs an important landscape, heritage and recreational role within the borough, which would be fundamentally altered by the introduction of a major new settlement.

## **17. Policy EN3 Should Be Strengthened**

17.1 SALFV also makes a constructive policy submission in relation to Policy EN3, which seeks to recognise and protect the Rainsbrook Valley landscape.

17.2 The policy commentary accompanying the Plan indicates that the proposed EN3 designation reflects the presence of a landscape corridor of elevated sensitivity, associated with the Rainsbrook Valley. However, the supporting policy comments document notes that the currently proposed boundary may not capture the full geographic extent of the valley landscape within the borough, and that multiple landscape studies indicate that the wider valley area also displays high sensitivity to major housing development.

17.3 SALFV agrees that this concern is well founded. The landscape evidence base including the Node Landscape Sensitivity Assessment repeatedly emphasises that the valley should be understood as a coherent landscape receptor, whose character and

appreciation are derived from its landform, visibility and spatial continuity rather than from the arbitrary limits of individual field parcels.

17.4 Where landscape receptors operate at that broader scale, it is important that policy protection is not inadvertently weakened by boundaries that appear overly precise when the underlying landscape processes are not.

17.5 At a minimum, Policy EN3 should therefore make clear that development proposals located outside but adjacent to the mapped designation must also demonstrate that they will not adversely affect the valley's character, setting, views, landscape experience or appreciation.

17.6 Such clarification would ensure that the policy reflects the way the landscape actually functions and would prevent attempts to rely on a narrow interpretation of the mapped boundary in circumstances where the evidence base recognises the valley as a single coherent landscape corridor.

17.7 SALFV therefore respectfully invites the Inspector to recommend one of the following approaches:

- an extension of the EN3 boundary so that it more accurately reflects the full spatial extent of the Rainsbrook Valley landscape within Rugby Borough; or
- additional policy wording clarifying that development immediately outside the designation must not cause harm to the character, setting, views or appreciation of the Rainsbrook Valley landscape.

17.8 Either approach would ensure that the policy is properly aligned with the landscape evidence base and that the valley's identified sensitivity is translated effectively into the Plan's development management framework.

## **18. Soundness Conclusions**

18.1 For the reasons set out in this representation, SALFV submits that the submitted Local Plan is justified in excluding Lodge Farm.

18.2 The Council's own evidence base demonstrates that Lodge Farm is not required in order for the Plan's overall spatial strategy to function, and that the borough's development needs can be met without reliance on this site.

18.3 Any attempt to introduce Lodge Farm through representations or Main Modifications would therefore face a significant soundness hurdle.

18.4 In particular, the available evidence indicates that the site would struggle to satisfy the "effective" limb of the soundness test, because it remains affected by:

- major transport and accessibility concerns;
- exceptional infrastructure requirements;
- significant viability constraints; and
- unresolved questions regarding deliverability.

18.5 The proposal would also sit uneasily with the environmental evidence base, including:

- the findings of the Sustainability Appraisal, which identifies continuing concerns regarding transport, infrastructure and viability;
- the Rainsbrook Valley Landscape Sensitivity Assessment, which identifies the valley as a landscape of good value with high sensitivity to major housing development; and
- the Lepus post-mitigation assessment, which concludes that even with extensive mitigation measures the landscape effects of the proposal would remain material.

18.6 Taken together, this evidence demonstrates that Lodge Farm is not a strategically necessary site whose impacts can be satisfactorily mitigated. Rather, it is a site whose core constraints remain substantial and unresolved, notwithstanding the promoter's attempts to reframe the proposal through a larger settlement concept.

18.7 SALFV therefore submits that the Council's decision not to allocate Lodge Farm represents a sound planning judgement based on the available evidence.

18.8 The Inspector is respectfully invited to support the submitted Plan in this regard and to reject any attempt to reintroduce Lodge Farm into the Local Plan.

## **19. Requested Outcome**

19.1 In light of the matters set out in this representation, SALFV submits that the submitted Local Plan is justified in excluding Lodge Farm and that the Plan's overall spatial strategy is strengthened by that decision.

19.2 In particular, SALFV supports the Council's dispersal-based approach to housing allocation across the borough, rather than the introduction of a single additional large-scale settlement at Lodge Farm.

19.3 The dispersal strategy adopted in the submitted Plan reflects a more balanced and realistic pattern of growth. It allows development to be distributed across a range of locations that are already functionally connected to existing settlements, services and infrastructure.

19.4 By contrast, the Lodge Farm proposal would concentrate a very substantial volume of development into a single location that remains constrained by transport limitations, landscape sensitivity and exceptional infrastructure requirements.

19.5 SALFV submits that the Council's dispersal strategy has a number of clear advantages when considered against the available evidence base:

1. **Deliverability:** A dispersed pattern of allocations across the borough is inherently more resilient and more likely to deliver housing in the short and medium term. Delivery can proceed across multiple sites and locations simultaneously, rather than depending heavily on the complex infrastructure,

viability and phasing requirements associated with a single large new settlement.

2. Support for existing settlements and town centres: A distributed pattern of development helps sustain and regenerate existing communities, including Rugby town centre and surrounding settlements, by directing new residents and economic activity into locations that already form part of the borough's social and economic structure.
3. Balanced infrastructure provision: Dispersed growth allows investment in schools, local services and transport improvements to be spread across the borough in response to incremental growth, rather than concentrating infrastructure demand within a single corridor already subject to substantial development pressure.
4. Avoidance of over-concentration of growth: The corridor south-west of Rugby, including the South West Rugby strategic allocation and the settlements around Dunchurch, is already accommodating significant levels of development and associated infrastructure demand. Introducing an additional major settlement at Lodge Farm would risk creating an excessive concentration of growth in this part of the borough, adding additional pressure on existing services and infrastructure.

19.6 In SALFV's submission, the Council's chosen strategy therefore represents a more balanced, deliverable and sustainable pattern of development across Rugby Borough than the promoter-led alternative centred on a new strategic settlement at Lodge Farm.

19.7 SALFV therefore invites the Council and the Inspector, at Examination, to:

1. support and retain the Council's decision not to allocate Lodge Farm within the Local Plan;
2. recognise that the Plan's dispersal-based spatial strategy represents a sound and deliverable approach to meeting the borough's housing needs;
3. reject any representation or proposed modification seeking to introduce Lodge Farm or Site 73 into the Plan;
4. recognise that the findings of the previous Local Plan Inspector concerning Lodge Farm remain a highly material consideration in assessing the site's suitability;
5. give appropriate weight to the current evidence base, including the Sustainability Appraisal and landscape assessments, which demonstrate that the site remains unnecessary, transport-constrained, infrastructure-heavy and subject to significant landscape sensitivity; and
6. consider whether Policy EN3 and the associated Policies Map would benefit from clarification or strengthening so that the Rainsbrook Valley designation more accurately reflects the full extent and setting of the valley landscape.

## **20. Participation at Examination in Public**

20.1 SALFV requests the opportunity to participate in the Examination in Public in relation to the following matters:

- the soundness of the Plan's treatment of Lodge Farm / Site 73;
- any proposal to introduce or revive Lodge Farm through Main Modifications or other amendments during the examination process;
- the wording, extent and effectiveness of Policy EN3 relating to the Rainsbrook Valley landscape of elevated sensitivity.

20.2 SALFV considers that it would be able to assist the Inspector by addressing the interaction between:

- the earlier Inspector's findings concerning Lodge Farm;
- the conclusions of the 2025 Sustainability Appraisal and SALFV's own evidence base;
- the Node Rainsbrook Valley Landscape Sensitivity Assessment;
- the Lepus post-mitigation landscape assessment; and
- the promoter's own concept, landscape and transport material.

## **21. Conclusion**

21.1 SALFV submits that the Council's submitted Local Plan represents a more coherent and defensible spatial strategy because Lodge Farm is not included as a strategic allocation.

21.2 The evidence base now before the examination indicates that:

- the site is not required in order for the Plan's strategy to function;
- the principal concerns identified by the previous Inspector remain materially relevant;
- transport and accessibility issues remain significant;
- the infrastructure burden associated with the site continues to raise serious viability concerns;
- the Rainsbrook Valley is a coherent landscape of good value and high sensitivity; and
- even after the mitigation measures proposed by the promoter are taken into account, material landscape harm would remain.

21.3 In these circumstances, SALFV submits that the most sound and evidence-based course is the one reflected in the submitted Plan:

The central planning judgement arising from the evidence base is straightforward: the Local Plan strategy functions effectively without Lodge Farm, while the site itself remains constrained, infrastructure-heavy and environmentally sensitive.

Submitted on behalf of:

Stand Against Lodge Farm Village (SALFV)

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Date:

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