

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official use
only)

**Name of the Local Plan to which
this representation relates:**

Rugby Borough Council Proposed
Submission Local Plan

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

Title

First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

2. Agent's Details (if applicable)

(where relevant)

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

Name or Organisation:

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

Paragraph	<input type="text" value="5.8 and 5.9"/>	Policy	<input type="text" value="EN4"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="18"/>				

4. Do you consider the Local Plan:

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

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

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

1. Policy EN4 Areas of Separation. Not Sound.

Overall Policy.

2. Within the Proposed submission version of the Plan a new policy is proposed, EN4 Areas of Separation. The purpose of this policy is to protect the identify and distinctiveness of settlements and prevent their coalescence. The National Planning Policy Framework 2024 (NPPF) at Paragraph 16 criterion c) advises that Plan-making should “be shaped by early, proportionate and effective engagement between plan-makers and communities, businesses”. To support the inclusion of the new policy, new studies have been commissioned which are available for review as part of the consultation.

3. It is considered that the late inclusion of this Policy, at the submission version of the Plan, does not allow for sufficient time or provide the opportunity to undertake

meaningful engagement with the Council and is therefore contrary to the advice set out in the NPPF.

4. The policy is not justified as it is not supported by proportionate evidence, which is clear and fails to provide a robust justification for the policy.
5. The policy is a criteria-based policy, setting out the criteria by which development will be assessed and considered acceptable.
6. The policy appears to be focused on avoiding coalescence and retain the separate identity of settlements; rather than protecting high quality landscapes in the urban fringe and provide access to the countryside. However, within the Areas of Separation Report, 2025, which it is understood to be the main technical evidence base to justify the new policy there is no reference or a list of criterion by which to assess the “identify and distinctiveness of settlements”. Only an assertion that the evaluation of settlement “primarily relies upon information drawn from conservation appraisals and parish or neighbourhood” (paragraph 5.6). As a result, it is considered that the approach adopted lacks clarity and transparency and does not provide a criterion for an independent assessment. This is a fundamental flaw within the evidence to justify the policy’s inclusion within the Plan and this therefore Not Sound.
7. There is a lack of definition of terms relating to the evidence base for the policy. Paragraph 5.7 of the Areas of Separation Report 2025, advises that land within an assessment area is deemed to make a stronger contribution to settlement identify and lists four criteria, however, there is no methodology to determine how “Strong contribution” is defined or indeed any information to say what less than a strong contribution means.
8. The same lack of definition relates to how “*important part*” of settlements have been defined, along with “*it features prominently in the views to and from the settlement*” and how prominent and positive contributions have been arrived at, without this information it is not possible to understand how this has been judged.

9. Concern is also raised over the criteria assessing the nature of arriving and departing to and from the settlement, it is not known where this is being assessed from, for example what types of routes would the receptor be passing along.
10. In addition, there is also a lack of definition in terms of the approaches taken for the physical and visual separation and the urban influences, with only a definition given for *stronger contribution*.
11. The methodology used to inform the policy is insufficient as it is inadequate and lacks clarity. The methodology does not demonstrate how the relative importance of the land parcels has been defined.
12. It is unclear as to what specialist technical input has been utilised in the preparation of the report, for example, heritage, conservation officer, landscape architect. The methodology section refers to a desk top based exercise being undertaken supplemented by planning officers have walked through and around the assessment area.
13. In summary the policy is Unsound as it is not justified for the following reasons.
 - The published Methodology/Approach is deficient, lacking in the definition of terms, and their detail of terms.
 - The LPA's methodology is insufficiently explained and lack clarity for an independent assessment.
 - The use of the published Methodology/Approach in the 2025 seems to have been used to only support higher contribution land (in order to support their justification of the enforcement of the Area of Separation advocated by the LPA).
 - The Methodology lacks detail and appears to be poorly explained and is insufficiently robust.
 - There is a lack of defining the scope and purpose of the study.
 - Who undertook the assessment and field-based assessment, their qualifications and experience i.e., Planner, Masterplanner, Landscape Architects?
 - Time of year when the field-based assessment was undertaken?

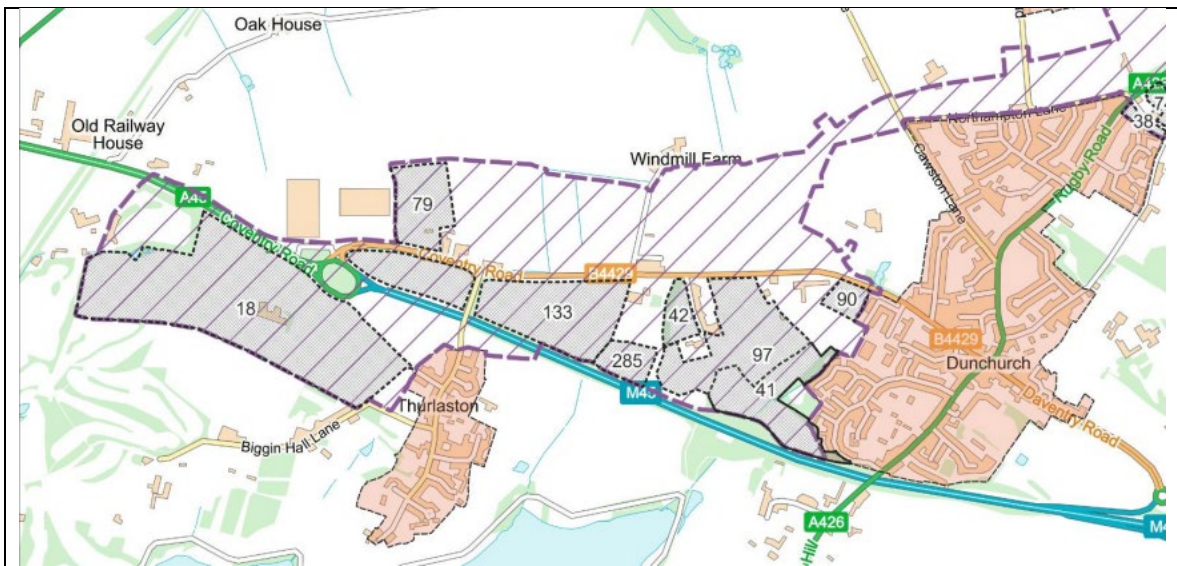
14. As a result the policy and the evidence base used to support the policy is not justified as it fails to take into account reasonable alternatives that could have been used as opposed to proposing an Area of Separation Policy.

Site Specific comments on the Barnwell Farm site.

15. The inclusion of the Barnwell Farm site within the Areas of Separation Policy is not justified or evidenced so is therefore Unsound.

16. Within the Areas of Separation report, November 2025, Chapter 7 sets out the context and justification for the Rugby – Dunchurch and Thurlaston Assessment. Paragraph 7.34 makes specific reference to the open countryside to the land north of Coventry Road, which shall act to separate Dunchurch and Thurlaston from the South West Rugby urban extension. At paragraph 7.26 reference is made to site 18 (Barnwell Farm) with the assertion made that development of the site would diminish the degree of separation between Thurlaston and Rugby and being located within 10metre of the village's western boundary, at its nearest point that development in this location would have a detrimental effect on the settlement.

17. As can be seen on the Plan below. Site 18, Barnwell Farm is not located between Dunchurch and Thurslaston. It is located to the west of Thurlaston. There is no evidence to justify why the Barnwell Farm site has been included within the Area of Separation designation. The assertion that development of the site would be in close proximity to the village is not founded in any technical work. The site could come forward taking into the location of the village and developed in such a way that the impact of any development on the village could be mitigated, minimised and acceptable in planning terms. No evidence has been produced to justify the comments made, with no opportunity provided to address concerns raised on that basis the site's inclusion is therefore considered unsound.



18. As set out about WPDG consider that Policy EP4 is not justified and should be deleted form the Plan. If the Policy is supported, then the removal of the site from the EP4 designation is sought given there are no site-specific reasons for its inclusion within the Policy.

19. The accompanying landscape technical note, dated March 2026, produced by Blade provides a detailed analysis of the proposed policy and the evidence base published to support the proposed Area of Separation Policy which confirms that the evidence base relied upon is not robust and fails to justify the inclusion of the policy within the Plan.

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.

20. Policy EP4 should be deleted from the Plan and if the policy is retained
The Barnwell Farm site should be removed from the EN4 Area of Separation Policy on the proposals map.

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

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

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

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

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

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

21. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

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<https://www.rugby.gov.uk/w/privacy#development-strategy>

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First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

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Post Code

Telephone Number

E-mail Address

2. Agent's Details (if applicable)

(where relevant)

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

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="S3"/>	Policies Map	<input type="text"/>
Site ID	<input type="text" value="18"/>				

4. Do you consider the Local Plan:

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

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- | |
|---|
| <ol style="list-style-type: none">1. The policy is not justified as it is not supported by proportionate evidence and fails to provide a robust justification for the policy.2. The concerns raised in our response to the Preferred Options consultation remain, the Councils evidence is not clear, not easy to understand and fails to allocate sufficient employment land within the Plan. The Plan fails to allocate the Barnwell Farm site as an employment allocation.3. The Council has produced an Alignment Paper Addendum dated November 2025, which seeks to address the comments and concerns made during the previous consultation on the Preferred Options and the Alignment Paper produced as part the evidence base published at the same time as the Preferred Options consultation.4. However, again the evidence contained within the updated Addendum is not clear with the evidence base used to justify the need for employment land within Rugby |
|---|

being largely out of date. Of note, the Addendum acknowledges this, commenting that this is not an issue. WPDG are of the opinion that this does matter and contend that the failure not to use up to date evidence results in a lack of employment needs being identified and a lack of employment sites allocated and therefore considers the Plan unsound.

5. Despite previous concerns raised over the lack of employment land proposed to be allocated the Council are still proposing a similar floorspace, however, with revisions made to the proposed allocations.
6. The Rugby Development Needs Topic Paper (December 2025) sets out how the employment need figure has been reached. However, it fails to address the additional needs that arises and which needs to be accommodated as a result of the shortfall identified in employment land at Coventry Gateway South, Opportunity Area 7, which falls within Coventry's administrative area, identified in the WMSESS. The shortfall identified was 90ha, however only 50ha is being proposed, it is considered that the full 90ha shortfall should be provided for. Of note, even with this identified shortfall the Council are still only proposing to allocate a similar level of employment land. Indeed, no land is allocated to address employment land shortfalls within the wider conurbation.

Stage 2 Site Options Assessment December 2025.

7. Within the Stage 2 site options assessment undertaken by the Council, the key concerns raised relating to the Barnell Farm site are the highway and heritage impacts and the coalescence/loss of separation that would result.
8. In terms of the highway issues raised, they appear to relate to the impact of the development on the highway and maintain that these could not be easily mitigated, concern that the capacity arising from the new Homestead Link Road will be used by other developments and lack of accessibility.
9. The NPPF 2024, paragraph 115 advises that when assessing sites for allocation for development in Plans that

- a) Sustainable transport modes are prioritised taking account of the Vision for the site, the type of development and its location;
- d) Any significant impacts from the development on the transport network or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

10. Furthermore, paragraph 116 of the NPPF advises that;

“Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”.

11. The significant change here is the need to adopt a Vision Led approach, this does not appear to have done and is therefore considered to contrary to the NPPF.

12. The Site has unconstrained access to the A45 / M45 Thurlaston Interchange junction to its immediate north, providing efficient access for HGVs and other vehicles. The site has been modelled, and it has been confirmed that access can be achieved from the M45/A45 interchange.

Thurlaston Conservation Area

13. In relation to the concern over the heritage impacts, namely in relation to the Thurlaston Conservation Area the commentary provided acknowledges that the level of potential harm would depend on the location, scale and type of developments, and states that large-scale commercial development in the eastern half of the site to create significant impacts.

14. Given the size of the Barnwell Farm site there is the opportunity to develop a range of employment buildings at different sizes, and for a well-designed landscaping buffer to be provided to mitigate and minimise impacts on the Conservation Area.

Draycote Meadows SSSI

15. The Site is sufficiently separated from the Draycote Meadows SSSI by the Whitefields Golf Club. Furthermore, landscaping, planting, and the retention of green buffers surrounding any built development will deliver sufficient protection for on- and off-site habitats.

Coalescence/loss of separation.

16. As set out above the concern raised into the coalescence and loss of separation is refuted.

Deliverability of the site.

17. The Barnwell Farm site is within single ownership, has a willing seller and there is developer and market demand for commercial space of varying size.

18. Given the unique nature of WPDG, WPDG would look to deliver small SME commercial space where there is an evident need and demand and lack of current delivery alongside plots for larger floor space delivery to meet a diversity of occupier requirements providing an holistic support for SME businesses and job creation.

19. As set out in our previous representations Rugby has an advantageous position for the provision of employment land, given its location and should maximise its potential to support economic growth and productivity a requirement of the National Planning Policy Framework 2024.

20. Since the publication of the Preferred Options consultation, the government has consulted on a revised NPPF, December 2025, it is acknowledged that this is consultation, however the importance of supporting economic growth is still a key requirement.

21. As set out in our previous comments Barnwell Farm site is ideally positioned and aligned to continue the growth of the logistics, warehousing and distribution growth with the area.

Response made to previous consultation for ease of reference.

Employment Need Evidence

Whilst Warwickshire Property Development Group do not disagree with the allocations made with the Preferred Options draft Local Plan, the Group raise into question the employment need evidence to ensure that Rugby Borough Council have accounted for **all** of the economic need of Borough and are making the appropriate amount of allocations to account for this need.

The Council's evidence in regards to the amount of employment land required for the Plan period 2045 does not account for the latest completions data to 2023/24 as a Plan period which begins in 2024 should do. Rather, the West Midlands Strategic Employment Sites Study (WMSESS) only accounts to 2021/22. This issue is not resolved by the HEDNA-WMSESS Alignment Paper as this does not provide sufficient detail, and whilst Rugby has experience growth in the sector in recent years, the Alignment Paper comes to contrasting conclusions.

As a result, the Council has not applied the latest completions data in determining their future need, despite these completions most accurately reflecting the state of the modern logistics market.

The most recent Authority Monitoring Report (AMR), dated to 2023/24, outlines that Rugby has seen 200.8ha of B2 / B8 and mixed-use completions. Extrapolating these completions over the 21-year Plan period would suggest a need of 522ha of industrial / mixed use employment land in Rugby.

522ha is clearly significantly higher than that proposed by the Council, which the Development Needs Topic Paper (DNTP) places at 284ha, of which only 81.5ha is accounted for in the adopted Local Plan. Furthermore, the DNTP also outlines that Coventry has an unmet need for 45ha of employment land which is not proposed to be met in this Local Plan.

Warwickshire Property and Development Group consider that the Council should revisit their evidence base in terms of employment need to ensure that the Plan can continue through examination as the consequence of under-estimating their employment need this severely could be dire.

Rugby's Advantageous Position

Rugby lies in an extremely advantageous position, at the confluence of the most prominent north-south connection in the UK, the M1 motorway, and significant east-west connections, namely the M6 and M45/A45.

As per Paragraph 86a of the Framework, the Council should positively and proactively encourage sustainable economic growth, with regard to the national industrial strategy, namely the report "Invest 2035: The UK's Modern Industrial Strategy". This strategy identifies "an enormous untapped potential outside the capital".

Alternative Site – Land at Barnwell Farm, Thurlaston (Site ID 18)

Warwickshire Property and Development Group's site at Barnwell Farm, Thurlaston (Site ID 18) is ideally positioned and aligned to continue the growth of the logistics, warehousing and distribution growth in the South West Rugby allocation.

The Site has unconstrained access to the A45 / M45 Thurlaston Interchange junction to its immediate north, providing efficient access for HGVs and other vehicles. There is clear demand for employment development in this location, demonstrated by the pre-letting of units within South West Rugby. The Council should embrace this demand through the allocation of the necessary employment development.

Thurlaston Conservation Area

WPDG understand the Council's concerns regards to the location of the Site in proximity to the Thurlaston Conservation Area. Any potential impacts on the Conservation Area can be assessed through further assessments on the Site and mitigated through a well-designed landscaping and planting scheme for the Site.

Draycote Meadows SSSI

The Site is sufficiently separated from the Draycote Meadows SSSI by the Whitefields Golf Club. Furthermore, landscaping, planting, and the retention of green buffers surrounding any built development will deliver sufficient protection for on- and off-site habitats.

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.

22. The Council should increase the amount of employment land within the Plan and allocated the Barnwell Farm for employment purposes.

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

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

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

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

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

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BLADE

LANDSCAPE TECHNICAL NOTE

LAND AT BARNWELLS BARN FARM,
WEST OF THURLASTON, CV23 9LF

ON BEHALF OF

WARWICKSHIRE PROPERTY DEVELOPMENT LTD

MARCH 2026

V2

BIODIVERSITY
LANDSCAPE
ARBORICULTURE
DESIGN
ECOLOGY

Report Data	
Title	Landscape Technical Note
Site Address	Land at Barnwells Barn Farm, west of Thurlaston, Rugby, CV23 9LF
Client	Warwickshire Property Development Ltd
Blade Reference	L-1930
Date Created	02/03/2026
Author	James Bullock

Version	Document Note	Author	Date Issued
V1	Draft for Client and Planning Team review	James Bullock	05/03/2026
V2	Update	James Bullock	06/03/2026

Disclosure:

This document has been prepared by BLADE Landscape Architects Ltd for the sole use of the commissioning client/s. It has been provided in accordance with the agreed scope and intended purpose. No other warranty is made as to the professional advice included in this document. It does not purport to give legal advice.

This report should not be copied or relied upon by any third party without the express prior written agreement of BLADE Landscape Architects Ltd and the commissioning client/s.

Where any appraisal is based upon information provided by third parties, it is assumed that this information is relevant, correct and complete; there has been no independent verification of information obtained from third parties unless otherwise stated.

Where field investigations have been carried out these have been appropriate to the agreed scope of works and carried out to a level of detail required to achieve the stated objectives.



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1.0 INTRODUCTION

Introduction

- 1.1. BLADE Landscape Architects Limited ('BLADE') were commissioned on behalf of Warwickshire Property Development Ltd (the 'Promotor') to appraise the Landscape baseline for land at Barnwells Barn Farm, situated west of Thurlaston, Rugby, CV23 9LF, and demonstrate its suitability for a new employment development.
- 1.2. This appraisal facilitates an independent technical evidence base for the Site's promotion through the Local Plan process. The assessment was informed by a desk-based review of available data, policy, landscape character publications and mapping, as well as the Area of Separation Study published by Rugby Borough Council in November 2025. A site visit was undertaken by a member of BLADE's Landscape Team in February 2026.

The Promotion Site

- 1.3. The land is situated at Barnwells Barn Farm, situated to the west of Thurlaston, Rugby, CV23 9LF (the 'Promotion Site'). The site is located at OS Grid Reference: SP 46124 71382 (site centre); see Appendix BLADE 1.
- 1.4. The Promotion Site is situated to the southwest of Rugby, on land south of the A45/M45 and north of Draycote Water (reservoir). Located nearest to the Thurlaston Interchange, the land is located between Thurlaston village and the Draycote Hotel and Golf Course and Driving Range,
- 1.5. The Site is located within the administrative area of Rugby Borough Council (the 'LPA').
- 1.6. The Promotion Site is managed for agricultural across several adjoining fields, with the site area including a farmstead, yard area and a number of agricultural storage buildings. The main vehicular access to the farm (and the wide Promotion Site) is from the A45/M45 to the north near to the Thurlaston Interchange, situated off which is Symmetry Park, a development of a new logistics and employment park.

The Purpose of this Landscape Position Note

- 1.7. This document is primarily focused in responding to the proposed Policy EN 4 of the Rugby Borough Council Local Plan Proposed Submission 2025-2042 (issued January 2026), and the inclusion of the Promotion Site within Area of Separation between Rugby, Dunchurch and Thurlaston, and examines the site's suitability for future development to demonstrate that the development of this land is both sustainable and appropriate.
- 1.8. The whole quantum of the site is within the control of the Promotor and forms the basis of the site representation to the Local Planning Authority as part of their 'Call for Sites'. The location of the Site is shown on the Site Location Plan contained within Appendix BLADE 1 of this document.

- 1.9. Rugby Borough Council's Local Plan has reached Regulation 19, the final stage before government examination. Linked to this, the LPA are proposing a policy area called Area of Separation, which is contained within their Regulation 19 policy, Policy EN4.

- 1.10. Policy EN4 is titled 'Areas of Separation' which has the aim of 'protecting the identity and distinctiveness of settlements and preventing their coalescence', whereby development in these areas will only be permitted that do not have a 'significant adverse impact, either alone or in combination with other existing or proposed development'. The policy is supported by an evidence base prepared by Rugby Borough Council titled the 'Area of Separation Study', which this Landscape Technical Note considers.

2.0 RELEVANT PLANNING POLICY

2.1. The findings of the relevant environmental and planning designations are summarised in this section. The following documents are relevant and will be discussed as appropriate later in this section:

- National Planning Policy Framework Revision (revised December 2024);
- Rugby Borough Council Local Plan 2011-2031 (adopted June 2019);
- Rugby Borough Council Local Plan Proposed Submission 2025-2042 (issued January 2026)
- Rugby Borough Council's Area of Separation Study (published November 2025).

2.2. The location of the Promotion site is situated outside of an adopted and made Neighbourhood Plan. Ordinarily, in the absence of a made neighbourhood Plan, BLADE would consider the location of a Promotion Site relative to important or key views which might be contained within a nearby or neighbouring Neighbourhood Plan. However, on this occasion, the nearby parish of Dunchurch is yet to prepare a Neighbourhood Plan.

Landscape-related Designations and Other Considerations

2.3. With consideration of the Rugby Borough Council's Local Plan 2011-2031 (adopted June 2019), BLADE finds the following:

- *National landscape designations:* The site does not lie within, adjoin, or is close to a Nationally designated landscape such a National Landscape (formerly an Area of Outstanding Natural Beauty) or National Park. The site is not situated within the Green Belt.
- *Local landscape designations:* The site does not lie within, adjoin, or is close to a locally designated landscape, such as a Green Space or Special Landscape Area. The Site is located outside of, but does neighbour the Thurlaston Conservation Area.

2.4. Consequently, given the foregoing the site is not afforded elevated protection under National and local planning policy (in landscape terms).

National Planning Policy Framework

2.5. The NPPF was updated in December 2024 and sets out the Government's planning policies for England and how these should be applied. At the heart of the NPPF is a presumption in favour of sustainable development.

- 2.6. The NPPF Para 131 states that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.
- 2.7. Para. 136 states that “new streets [should be] tree-lined”, and “that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible”.
- 2.8. Paragraph 187 notes that the “intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services” should be recognised. Paragraph 188 makes it clear that there is a hierarchy to the importance and value attributed to landscapes, and that the development plans should distinguish between these and take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.
- 2.9. Relevant Planning Policy Guidance that accompanies the NPPF includes that relating to Green Infrastructure, Landscape, and Design (including the National Design Guide).

Adopted Local Plan

- 2.10. The Rugby Borough Council Local Plan outlines planning policies and proposals for new development to ensure that Rugby is a great place to live, work, and do business. The plan is prepared in consultation with residents and stakeholders, and councils must review their Local Plan every five years.
- 2.11. The current Local Plan covers the period from 2011 to 2031 and includes strategic planning policies and detailed development management policies. Additionally, a recent ‘issues and options’ consultation was conducted to gather views on key issues and options for new policies.
- 2.12. Their Local Plan was adopted in June 2019 with the aim of providing a clear vision for how new development can address challenges and identifies where, when, how much and how new development will take place in the district up to 2031, and these policies are afforded appropriate weight.

Policy NE3

- 2.13. The main Landscape-derived policy is the Policy NE3 which is entitled ‘Landscape Protection and Enhancement.’ The purpose of Policy NE3 is to ensure that ‘significant landscape features are protected and enhanced and that landscape design is a key component in the design of new development’.

2.14. This policy states the following:

- *'New development which positively contributes to landscape character will be permitted. Development proposals will be required to demonstrate that they:*
- *Integrate landscape planning into the design of development at an early stage;*
- *Consider its landscape context, including the local distinctiveness of the different natural and historic landscapes and character, including tranquillity;*
- *Relate well to local topography and built form and enhance key landscape features, ensuring their long term management and maintenance;*
- *Identify likely visual impacts on the local landscape and townscape and its immediate setting and undertakes appropriate landscaping to reduce these impacts;*
- *Aim to either conserve, enhance or restore important landscape features in accordance with the latest local and national guidance;*
- *Address the importance of habitat biodiversity features, including aged and veteran trees, woodland and hedges and their contribution to landscape character, where possible enhancing and expanding these features through means such as buffering and reconnecting fragmented areas; and*
- *Are sensitive to an area's capacity to change, acknowledge cumulative effects and guard against the potential for coalescence between existing settlements.'*

2.15. Consequently, Policy NE 3 is the main engaged Landscape-derived policy by which the proposed development would be assessed against. Further pertinent policies include:

Policy NE 2

2.16. Policy NE2 is entitled ' Strategic Green and Blue Infrastructure', and states the following:

- *'The Council will work with partners towards the creation of a comprehensive Borough wide Strategic Green and Blue Infrastructure Network which is inclusive of the Princethorpe Woodland Biodiversity Opportunity Areas (also known as the Princethorpe Woodlands Living Landscape), as shown on the Green and Blue Infrastructure Policies Map. This will be achieved through the following:*

- *The protection, restoration and enhancement of existing and potential Green and Blue Infrastructure assets within the network as shown on the Policies Map; and*
- *The introduction of appropriate multi-functional corridors between existing and potential Green and Blue infrastructure assets.*
- *Where appropriate new developments must provide suitable Green and Blue Infrastructure corridors throughout the development and link into adjacent strategic and local Green and Blue Infrastructure networks or assets where present.*
- *Where such provision is made a framework plan should be produced as part of the planning application demonstrating the contribution to the overall achievements of the multi-functional strategic Green and Blue Infrastructure network. A management plan, based on delivering the framework plan and detailing how the infrastructure will be managed, may be required by condition.'*

2.17. In support of this Policy, supplementary wording is provided by the LPA at paragraph 9.10 onwards of the adopted Local Plan, and states:

'Where new multi-functional corridors between existing Green and Blue Infrastructure (GI) assets are made from a development site a framework plan will be required which addresses how to achieve the balance of public access and the protection of the existing Green/Blue Infrastructure site's asset. The framework plan should be informed by the GI Study and factor in the following:

- *Indicative buffers for the important Green and/or Blue Infrastructure corridors which form part of the strategic networks such as watercourse corridors and disused railway lines;*
- *Retain sites of historic environmental value;*
- *Indicative buffers where required to protect important Green/Blue Infrastructure against adjacent developments;*
- *Retain valued semi natural habitats; and*
- *Set out the local network of Green/Blue Infrastructure and how it will be managed and developed.'*

Policy SDC 2

2.18. Policy SDC2 is entitled 'Landscaping' and states the following:

The landscape aspects of a development proposal will be required to form an integral part of the overall design. A high standard of appropriate hard and soft landscaping will be required. All proposals should ensure that:

- *Important site features have been identified for retention through a detailed site survey;*
- *Features of ecological, geological and archaeological significance are retained and protected and opportunities for enhancing these features are utilised (consideration will also be given to the requirements of policies NE1 and SDC3 where relevant);*
- *Opportunities for utilising sustainable drainage methods are incorporated;*
- *New planting comprises native species which are of ecological value appropriate to the area;*
- *In appropriate cases, there is sufficient provision for planting within and around the perimeter of the site to minimise visual intrusion on neighbouring uses or the countryside; and*
- *Detailed arrangements are incorporated for the long-term management and maintenance of landscape features.'*

Rugby Borough Council Local Plan Proposed Submission 2025-2042 (issued January 2026)

Policy EN2

2.19. EN 2 is titled 'Landscape protection' and states the following (N.B. Underlining added by BLADE for emphasis):

A. Development shall avoid significant adverse impacts on landscape character and significant adverse visual impacts.

B. Development proposals must be located and designed to respect scenic quality and maintain a distinctive sense of place.

C. Development proposals must avoid detrimental impacts on landscape features which make a significant contribution to the character of the area or to the setting of a heritage asset or settlement'.

Policy EN 4

- 2.20. Policy EN 4 is titled 'Areas of Separation' and states the following (N.B. Underlining added by BLADE for emphasis):

'A. Areas of Separation are defined on the policies map between Rugby town and the settlements of Clifton upon Dunsmore, Dunchurch and Thurlaston.

B. Development will only be permitted in these areas when it will not have a significant adverse impact, either alone or in combination with other existing or proposed development, on the effectiveness of an Area of Separation in protecting the identity and distinctiveness of settlements and preventing their coalescence.

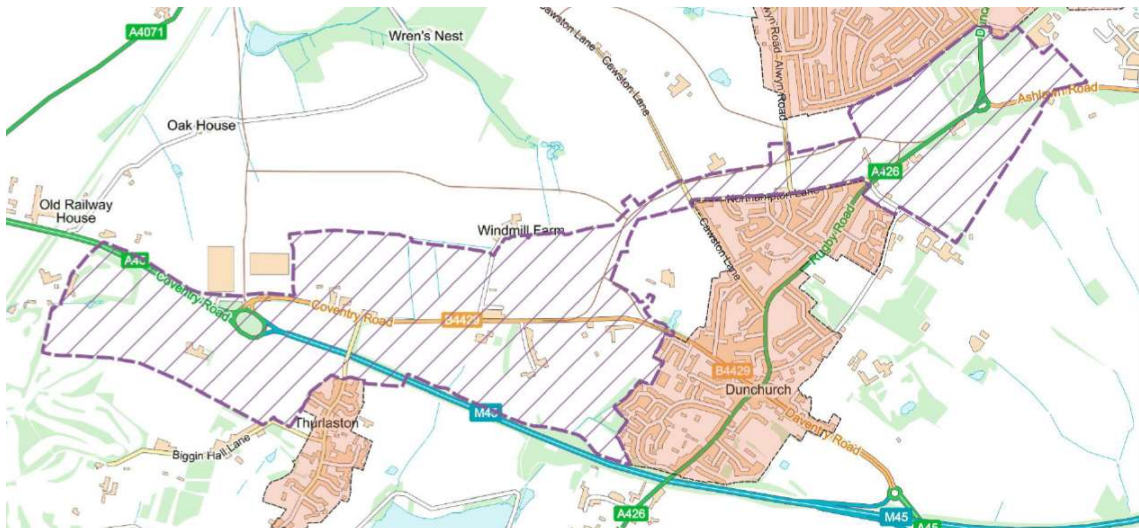
C. Developments that diminish physical and visual separation, have an urbanising influence, or which adversely impact settlement identity should be deemed as having an adverse impact on the effectiveness of an Area of Separation.

D. Applicants proposing development that may have an adverse impact on an Area of Separation must demonstrate that they have considered this impact and have incorporated appropriate mitigatory measures into their proposal'.

Summary of the Rugby Borough Council's Area of Separation Study (published November 2025)

- 2.21. In the foregoing, the LPA finds the Promotion Site to be located within the area referred to as the 'Rugby-Dunchurch-Thurlaston'; see Image BLADE 2.1:

Image BLADE 2.1: Extract from the Rugby Borough Council's Area of Separation Study (published November 2025), PDF page 20, Figure 5: Rugby-Dunchurch-Thurlaston assessment area



- 2.22. In their commentary of this area, the LPA states this area is considered as the '*separation between Rugby town and Dunchurch and Thurlaston*', which lies '*between the town and the two villages and is outside of the settlement boundaries as defined by the adopted local plan.*' ,
- 2.23. Within the area which the LPA are proposing for this Area of Separation, the LPA breaks the land down into a northern, central and southern area; which it refers to as Section A, B and C respectively. For the southern area (Section C), the LPA comments (N.B. Underlining added by BLADE for emphasis):
- 'Section C: The largest section of the assessment area is that to the west of Dunchurch and north of Thurlaston. This is comprised of farmland, allotments, isolated homes, and a garden nursery to the north of Coventry Road; dwellings, a church, farmland and paddocks to the south of Coventry Road; and Barnwells farm and a golf club driving range to the northwest of Thurslaston. It is intersected by the M45 and Coventry Road.'*
- 2.24. The Promotion Site is located within the smaller land area referred to by the LPA as Area 18, for which the LPAS provide no detailed analysis for within their Area of Separation Study. See Section 3 of this Landscape Technical Note.
- 2.25. Overall, the LPA does not afford a clear and direct conclusion on the importance of the proposed Rugby-Dunchurch-Thurlaston Area of Separation. However; in the absence of a clear conclusion, it is assumed that the LPA consider that the quantum of this area perform a significant role against the objectives of Policy EN 4 of the Rugby Borough Council Local Plan Proposed Submission 2025-2042 (issued January 2026).
- 2.26. As discussed within the following section, the Area of Separation published by the LPA in November 2025 has a number of deviancies.

3.0 REVIEW OF THE LPA'S AREA OF SEPRATION STUDY METHODOLOGY

3.1. Having reviewed the LPA's methodology contained in their Area of Separation Study (November 2025), BLADE considers that their methodology is rather 'wishy-washy' and lacking clarity and definition.

3.2. In terms of policy – the pertinent (adopted) policy is Policy NE3: Landscape Protection and Enhancement for which the LPA states at paragraph 4.1 of the Area of Separation Study, the following:

'The adopted Rugby Borough Council Local Plan does not contain any policies that are intended to maintain designated areas of separation between the town and nearby villages. However, Policy NE3: Landscape Protection and Enhancement (p.76) does require development proposals to "guard against the potential for coalescence between existing settlements" and "aim to either conserve, enhance or restore important landscape features", which, in the case of areas between the town and nearby villages may potentially include landscape features that contribute towards the degree of settlement separation'.

3.3. Notwithstanding this, the Local Plan Proposed Submission, Policy EN4 Areas of Separation does not rule out new development within an Area of Separation, allowing for development to be mitigated – see section d of this policy which states:

'D. Applicants proposing development that may have an adverse impact on an Area of Separation must demonstrate that they have considered this impact and have incorporated appropriate mitigatory measures into their proposal'.

3.4. Consequently, development could be permitted so long as it does not have a detrimental effect on the sense of separation, and/or this development could be mitigated through a well-design scheme, and so the identify of settlements can remain whilst the function of the area of separation remain functional.

3.5. Given this, BLADE considers that the Local Plan Proposed Submission, specifically Policy EN4 is focussed on avoiding coalescence and retaining the separate identity of settlements; rather than protecting high quality landscapes on the urban fringe and provide access to the countryside – this is reflected by Point B of the policy which states:

'B. Development will only be permitted in these areas when it will not have a significant adverse impact, either alone or in combination with other existing or proposed development, or the effectiveness of an Area of Separation in protecting the identity and distinctiveness of settlement and preventing their coalescence'.

3.6. It is appreciated that there is no Nationally adopted methodology for such a study, and this is recognised by the LPA in their Area of Separation Study (Nov 2025); see paragraph 3.4.

- 3.7. However, there is a lack of defining the scope and purpose of the study. Having reviewed the Method for the Aea of Separation, BLADE considers that this study lacks the following:

The Qualifications and Experience of who undertook the Study and its Field-Based Work

- 3.8. The Methodology and Approach does not confirm who undertook the assessment and field-based assessment, their qualifications and experience i.e., Planner, Masterplanner, Landscape Architects?

When was the Field-Based Assessment undertaken.

- 3.9. The Methodology and Approach does not confirm Time of year when the field-based assessment was undertaken.

Lack of Assessment Criteria

- 3.10. The methodology does not provide an assessment criteria for the '*identity and distinctiveness of settlement*' – only asserting that the evaluation of settlement identity 'primarily relies upon information drawn from conservation area appraisals and parish or neighbourhood plans' (paragraph 5.6). This approach lacks clarity and transparency and does not provide a criterion for an independent assessment of higher function to lower function land.

- 3.11. Whilst, the LPA does go on to list a criterion by which land within an assessment area is deemed to make a stronger contribution to settlement identity'. The following is the only criteria which they list:

- *'It is an important part of a settlement's setting;*
- *It features prominently in the views to and from the settlement;*
- *It provides a clear sense of arrival to or departure from the settlement; or,*
- *It contributes positively to a conservation area'.*

- 3.12. However, this approach lacks transparency and a scoring mechanism for examination. This is a deficiency i.e., how did the LPA, or an independent assessor, define less than a 'stronger contribution'.

- 3.13. Unfortunately, this situation further replicated through the LPA's methodology for examining the Physical and Visual Separation and Urbanising Influences. Again, the LPA attempt to only define 'stronger contribution'.

- 3.14. Given this, it is clear there is a lack of clarity and the methodology is inadequate in its breadth and definition to only support not stronger or stronger contributions. Consequently, the methodology does not demonstrate how the relative importance of land parcels have been defined through a lack of terms.

Lack of Clear Conclusion – Broad Area

- 3.15. The LPA identifies larger, broad areas of land which it is recommended form part of the Aea of Separation. From reviewing the Section 7, the LPA provide no clear analysis for the scoring of the land's importance, and consequently conclusion of its justification to include the relative land within the Aea of Separation. For instance; why does this land make a 'stronger contribution'. This is a deficiency.

Lack of Clear Conclusion – Smaller Land Parcels within the Broader Area

- 3.16. Within the larger, broad areas, the LPA identified a number of small land parcels, which it refers to Section A, B and C, and then reduces the scale of these further with smaller areas, which it provides a numerical reference for. For instance; why does this land make a 'stronger contribution'. This is a deficiency.

- 3.17. However, the LPA provides no evidence of an assessment of these areas, which combined with the lack of any clear conclusion for the broader Area of Separation, makes the study confusing an clacking in evidence. This is a deficiency.

- 3.18. In summary, the following deficiencies are noted within the LPA's methodology for their Area of Separation:

- The published Methodology/Approach is deficient, lacking in the definition of terms, and their detail of terms.
- The LPA's methodology is insufficiently explained and lack clarity for an independent assessment.
- The use of the published Methodology/Approach in the 2025 seems to have been used to only support higher contribution land (in order to support their justification of the enforcement of the Area of Separation advocated by the LPA).
- The Methodology lacks detail and appears to be poorly explained and is insufficiently robust.
- There is a lack of defining the scope and purpose of the study.

- Who undertook the assessment and field-based assessment, their qualifications and experience i.e., Planner, Masterplanner, Landscape Architects?
- Time of year when the field-based assessment was undertaken?
- Lack of any clear conclusive statement relative to the broad area of land within the proposed Area of Separation, the smaller Section A, B and C areas, as well as the smaller land areas numerically referenced.

3.19. Overall, BLADE concludes that the LPA does not provide a fully detailed Methodology with individual criterion for assessing land within the proposed Areas of Separation, and fails to provide a scoring mechanism for its contributions. Given this, BLADE considers that the LPA's methodology is rather 'wishy-washy' and lacking clarity and definition, and its application is not transparent in its judgement. The publicised methodology is deficient.

4.0 THE RUGBY-DUNCHURCH-THURLASTON AREA OF SEPARATION

Introduction

- 4.1. The Promotion Site is situated within the proposed Rugby-Dunchurch-Thurlaston Area of Separation; albeit on its peripheral southwestern edge rather than central to the wider land area.
- 4.2. Given that the LPA has not published its appraisal of smaller land parcels, or the southern part of this area (Section C), we must consider that the stated level of contribution is that of the broad area.

'The role that the area between Rugby and Dunchurch and Thurlaston plays in separating the settlements will be diminished once the South West Rugby urban extension is built. Nevertheless, substantial open areas remain which are important for maintaining some degree of separation'.

- 4.3. In their description, the LPA recognise a number of existing urban, developed land or infrastructure features; and despite the Promotion Site being outlying to Thurlaston village, there are the following features within, or influencing the Site.
 - A45 Coventry Road;
 - Thurlaton Interchange on the A45 Coventry Road with Symmetry Park situated off with extensive employment and distribution built form and infrastructure;
 - Golf Club and driving range;
 - Hotel with extensive car parking;
 - Storage World with extensive open air storage;
 - Neighbouring/scattered residential dwellings;
- 4.4. From the Area of Separation Study (November 2025), the LPA consider the proposed Rugby-Dunchurch-Thurlaston Area of Separation makes a 'stronger contribution' for i). Settlement Identity; ii). Physical and Visual Separation; and iii). Urbanising Influences.

Site-Specific Appraisal

- 4.5. From our field-based assessment, BLADE considers each one of these categories as follows:

Settlement Identity

- 4.6. The Promotion Site neighbours the western settlement of Thurlaston. Under the heading of Settlement Identity (Thurlaston), the LPA states N.B. Underlining added by BLADE for emphasis):

'Thurlaston is a historic village with a character that is formed by low density linear development within an agricultural setting. It has a conservation area (which is in generally good condition) that covers c. 40% of the land within the settlement boundary, stretching along most of Main Street and Church Lane, and which contains five Grade II listed buildings. Most of the dwellings to the north of the village (off Main Street, The Gardens, and Beech Drive) are of a modern 20th century construction, as are those to the south (Pudding Bag Lane, Moat Close and Grays Orchard).'

- 4.7. This appraisal is made by the LPA for the whole of the southern part of the Rugby–Dunchurch and Thurlaston Area of Separation; rather than providing a site-specific assessment. The Section C area is a broad, tract of land, and whilst the LPA do not provide a map or plan defines each of Section A, B and C, Section C covers an extensive area.

- 4.8. BLADE notes the following from the LPA's assessment:

It is an important part of a settlement's setting

- 4.9. The LPA states the following:

'Thurlaston is a historic village with a character that is formed by low density linear development within an agricultural setting'.

- 4.10. From our field-based assessment, BLADE would agree with this description of Thurlaston village; but only in part. As noted by the LPA in their own examination of 'Urbanising Influences', there also 'significant urbanising influences, including the M45, Coventry Road, and the warehouses of Symmetry Park' which are situated within the setting of the village.

It features prominently in the views to and from the settlement

- 4.11. BLADE notes that the LPA provide no direct appraisal of how the proposed Area of Separation influences views to and from the settlement, or how intervisible this area is from the village.

- 4.12. For views towards the village, BLADE notes the following from our field-based assessment:

- Views of the Promotion Site from the north are restricted by the existing built form at Symmetry Park, as well as the tree'd route of the A45/M45 road corridor. Beyond these features dwellings are scattered. The southwestern edge of Rugby town is circa 1.75km to the northeast at Cawston.

- To the east, views of the Promotion Site are possible from the outlying settlement of Dunchurch (circa 1.5km east); however, the effect of the existing buildings and village related land uses at Thurlaston restrict direct views of the Site. Additionally, the route of the A45/M45 road corridor with its extensive groups of trees and intervening field hedgerows, hedge line trees and frequently woodland further reduces the discernibility of the land at the Promotion Site.
 - To the south, Draycote Water is a large (240 Hectare) reservoir whereby there is limited opportunity to see the Promotion Site from.
 - The grounds of the Draycote Golf Course and Draycote Hotel extend around the promotion Site and enclose it from the wider open countryside beyond.
 - The extensively tree'd grounds of the golf course and the neighbouring and Far Popehill Spinney to the west further enclose the Site and restrict direct views from the wider open countryside to the west. Between the woodland and the nearest road, Sraight Mile, landform is similar or less than that at the Promotion Site. Consequently, the Promotion Site is not experienced as elevated landform or prominent in views.
- 4.13. Given the foregoing, BLADE judges that the Promotion Site is not experienced as prominent in views to and from the village of Thurlaston, and from outlying settlements such as Cawton and Dunchurch. The Site is located between the A45/M45 and Draycote Water and is not within prominent and elevated landform, with the combination of the tree groups, woodland and the tree components of the golf course further restricting views to the Site.
- 4.14. For views out from the village, BLADE notes the following from our field-based assessment:
- The Promotion Site is experienced as agricultural land to the west of the village. It is anticipated that dwellings situated on the western side of Main Street may have views across the Promotion Site. Generally, these dwellings are situated north of Biggin Hall Lane, around Stocks Lane and to the northern edge of the village along Main Street. The extent of these views are influenced by the type and scale of residential curtilages, tree component and amenity planting within private gardens.
 - A similar situation occurs along Biggin Hall Lane for the small number of residential dwellings clustered along this route. Generally, rear amenity space and elevates are enclosed by extensive tree components in the neighboring field barns.
 - To the east and southern edge of the village, and approaches into the village along Church Road and Main Street, there is generally little opportunity to see the Promotion Site due to the effect of intervening built form and village-related land uses, as well as small wooded blocks and tree groups to the east of Main Street.

- 4.15. Given the foregoing, the Promotion Site is not prominent in views from within the village or along its approaches. In terms of its landform, or its position for views from within the village core or its Conservation Area, the land at the Promotion Site is not prominent, and with the Conservation Areas being an enclosed and clustered, there is limited opportunity to see beyond the centre of the village which has a linear form.

It provides a clear sense of arrival to or departure from the settlement

- 4.16. BLADE notes that the LPA provide no direct appraisal of how the proposed Area of Separation would be experienced passing to and from the Thurlaston., either long the Main Road through the village centre or along Biggin Hall Lane, Stocks Lane, or when walking along the local Public Right of Way network.

- 4.17. From our field-based assessment, BLADE notes the following:

- The village is unusual in having only one entrance, via the bridge across the A45/M45. When passing along Main Street through the village, there is little if any opportunity to look across to the Promotion Site. The Thurlaston Conservation Area is situated in the core of the village, and is compacted and has an enclosed and restricted nature due to the linear arrangement of built form along Main Street.
- To the north, there is a short section of Main Street running beyond the village and across the A45/M45. This route is enclosed by lines of extensive trees restricting direct views across to the Site, beyond which there are intervening agricultural fields, as well as the well tree'd and vegetated curtilage to northern village edge. Beyond this point, Main Street is further enclosed by tree groups along this route as well as along the route of the A45/M45 which is extensively tree'd. A similar situation occurs along the Coventry Road to the north of the A45/M45. Overall, even in winter-time conditions, these features significantly restrict views towards the Promotion Site.
- Beyond the foregoing, Main Street runs to the south towards Draycote Water. From this location, there are no direct views across to the Promotion Site due to the private gardens of these individual dwellings and their mature tree components, amenity planting and garden walls/curtilage fencing.
- Roads running east and west off Main Street are 'dead end' routes and lead to any outlying settlements. To the east along Church Road, the effect of intervening built form and tree components is sufficient to restrict views of the Site. To the west along Stocks Lane and Biggins Hill Lane, the southern end of the Site can be experienced, with views filtered and restricted by field hedgerows and mature hedge lines. In these situations the Site is not seen wholesale by Road Users.

It contributes positively to a conservation area

4.18. BLADE notes that the LPA appraisal states:

'It has a conservation area (which is in generally good condition) that covers c. 40% of the land within the settlement boundary, stretching along most of Main Street and Church Lane, and which contains five Grade II listed buildings. Most of the dwellings to the north of the village (off Main Street, The Gardens, and Beech Drive) are of a modern 20th century construction, as are those to the south (Pudding Bag Lane, Moat Close and Grays Orchard).'

4.19. From our field-based assessment, BLADE notes the following:

- Thurlaston village has a linear settlement pattern, with the Conservation Area running inter-alia with Main Street. However, the Conservation Area is experienced as clustered and inward looking with buildings close to the roadway (Main Street). The agricultural land beyond the village, and the opportunity to see this from within the Conservation Area, is not a key feature.
- The Thurlaston Conservation Area Appraisal, prepared by Rugby Borough Council, recognised the following (N.B. Underlining added by BLADE for emphasis):

'The village is predominantly linear in form with Main Street running the length of the settlement from north to south with a number of narrow lanes and more modern cul de sacs running to the east and west. The Conservation Area covers only part of the village with areas to the north-east; northwest, east and south excluded from the designation'

- Additionally, the Thurlaston Conservation Area Appraisal states (N.B. Underlining added by BLADE for emphasis):

'From outside the village the landscaping prevents views of the majority of buildings, trees on the approach effectively screen the buildings. From Biggin Hall Lane views of buildings are limited other than the nursing home. From the southern end of the village the route of Main Street and the landscaped boundaries prevents clear views of many buildings. There is a close relationship between Main Street and the countryside on the western side since development is narrow and butts up to the highway. Along the eastern side of Main Street there is greater depth to the settlement and therefore the surrounding countryside has less of an impact.'

4.20. Overall, open and undeveloped land which affords direct views to the open countryside, or vista out with of the Conservation Area are not within the Conservation Area. Given this, BLADE judges that the Promotion Site is not prominent in its position relative to the Conservation Area, and views to the Promotion Site are not intrinsically important to the character of the Conservation Area.

Physical and Visual Separation

- 4.21. From the observations of the whole area, the LPA states the following N.B. Underlining added by BLADE for emphasis):

'The gap between Rugby town and Dunchurch and Thurlaston varies in length and will be significantly changed once the South West Rugby urban extension is built out. Presently, there is around 300m between the north of Dunchurch (Northampton Lane) and the south of Rugby (Montague Road) which will be reduced to around 100-150m once South West Rugby is constructed. Thurlaston is currently around 1.6km from the settlement boundary of Rugby at its nearest point (between Main Street and Cawston Lane) but is only c. 350m from the Symmetry Park industrial estate which forms part of the South West Rugby allocation.

- 4.22. The LPA continues:

'To the north of Thurlaston (Section C), the main physical features separating the village from the town are the M45, Coventry Road, and Cawston Spinney – although the latter will no longer be located between the two settlements once South West Rugby is built out.

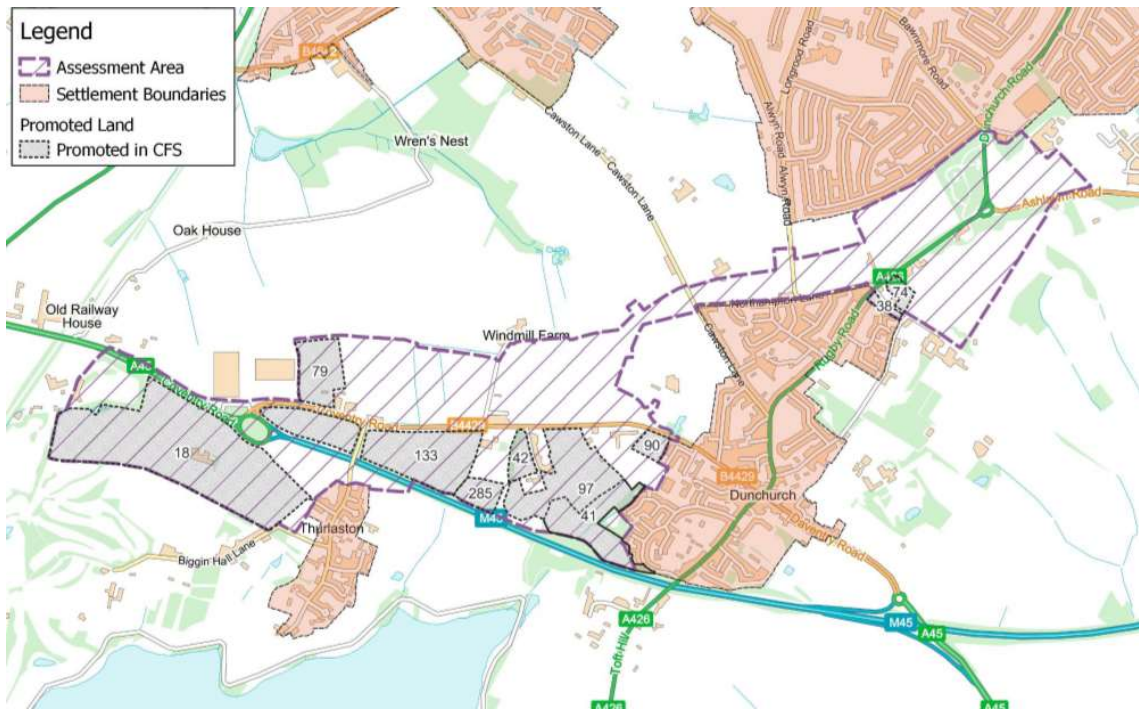
There is currently no intervisibility between Thurlaston and Rugby town. Given the area's topography, and the presence of trees and vegetation along the M45 and Coventry Road which act to screen the village, it is expected that most of the South West Rugby urban extension will not be visible from the village either. However, immediately upon exiting the village along Main Street, or via the public right of way that connects Stocks Lane to Biggin Hall Lane, the warehouses of Symmetry Park are prominent in views to the northwest.

- 4.23. BLADE observes the following from our field-based assessment:

It contributes to a broad gap between settlements

- 4.24. The land at the Promotion Site is within the broad gap area identified by the LPA in their study. However, as demonstrated by Image BLADE 4.1, the vast majority of this gap is situated to the north of the A45/M45 corridor.
- 4.25. However, as recognised by the LPA in their analysis, the *'area's topography, and the presence of trees and vegetation along the M45 and Coventry Road which act to screen the village'*, and it is these physical features which contain the Site, and segregates it from the wider area being proposed by the LPA.
- 4.26. Give this, whilst the Promotion Site physically contributes to the LPA's broad gap between Rugby and Dunchurch, its contribution is negligible as it is adjunct or supplementary to the wider land area. This land south of the A45/M45 is not physically related due to the strong physical features and built form which enclose the land beyond the A45/M45 to its north; see Image BLADE 4.1:

Image BLADE 4.1: Extract from the Rugby Borough Council's Area of Separation Study (published November 2025), PDF page 23, Rugby-Dunchurch-Thurlaston Assessment Area



It has land cover or a topography which restricts intervisibility between the settlements

- 4.27. BLADE notes the LPA's own conclusion that there is 'currently no intervisibility between Thurlaston and Rugby town. Given the area's topography, and the presence of trees and vegetation along the M45 and Coventry Road which act to screen the village, it is expected that most of the South West Rugby urban extension will not be visible from the village either'. From our own field-based assessment, BLADE concurs with this conclusion.
- 4.28. The Promotion Site is situated west of Thurlaston, yet the next outlying settlement to Thurlaston is Bourton on Dunsmore, circa 3km west. The effect of intervening landform, golf course and wooded blocks reduce the intervisibility between these two settlements, and the wider man-made and natural features enclose the Site to contain any new development within. Consequently, it is judged by BLADE, that the Promotion is not prominent between these two settlements.

It has a clear physical feature that marks the settlement edge

- 4.29. The Promotion Site is situated between extensive man-made and natural features; these being a main arterial roadway with road interchange and extensive built form thereof, a village settlement, woodland blocks with a golf course and hotel. Given this, the land at the Site does not mark the settlement edge, rather like the wider agricultural land around Thurlaston, it contributes to its setting.

- 4.30. The Promotion Site is situated south of the A45/M45 and is beyond extensive features which define the wider area.

It does not contain direct vehicular links between settlements

- 4.31. The Promotion Site does not direct vehicular links between settlements; see Image BLADE 4.1 above.

Urbanising Influences

- 4.32. From the observations of the whole area, the LPA states the following N.B. Underlining added by BLADE for emphasis):

'There is little sense of departure and arrival when travelling between Dunchurch and Rugby along Alwyn Road, given that residential dwellings of both settlements can be seen at nearly all times, and it is expected that the situation shall be similar for Cawston Lane once South West Rugby is built out. There is a clearer sense of departure and arrival when travelling along the A426, although the edges of at least one of the two settlements can be seen at all times.

The land to the west of Dunchurch and north of Thurlaston (Section C) is primarily occupied by farmland, paddocks, allotment gardens, and areas of low-density housing of a rural or semi-rural character. However, there are also significant urbanising influences, including the M45, Coventry Road, and the warehouses of Symmetry Park.

There is a reasonably clear sense of departure and arrival when travelling between Thurlaston and Dunchurch, enhanced by the enclosure of the northern part of Main Street and much of Coventry Road by open countryside. However, the ribbon development that is encountered to the west of the boundary of Dunchurch (on the southern side of Coventry Road) has a minor urbanising influence and weakens the clarity of the village boundary.'

- 4.33. BLADE observes the following from our field-based assessment:

It lacks any development, or the development which exists is rural in character

- 4.34. The Promotion Site does not contain development. The land is managed for agriculture but is enclosed by extensive man-made features including the A45/M45 arterial route and built form thereof at the road interchange, as well as the wider grounds of the golf course and hotel. Land to the east, south and western edge of the village has a more prevailing rural character.

It lacks infrastructure associated with human activity

- 4.35. Similar to the above, the Site is managed for agriculture. However, this land is influenced by the neighbouring land uses and built form of the A45/M45 and road interchange, the warehouse and distribution built form at Symmetry Park, as well as the neighbouring village. Land to the east, south and western edge of the village has a more prevailing rural character.

It has natural or semi-natural land uses, such as woodland or wetlands

- 4.36. The Promotion Site is managed for agriculture – a combination of arable crop production and livestock pasture. This land use is homolysed around the periphery of Thurlaston. The field pattern is larger than those generally around the edge of Thurlaston village, for which, BLADE presumes that the Site has been subject to hedgerow removal/loss through modern agricultural cropping practices.

5.0 THE CURRENT FUNCTION OF THE PROMOTION SITE

- 5.1. The Site is situated within the proposed Rugby-Dunchurch-Thurlaston Area of Separation which covers the wedge of land between Rugby town and Dunchurch and Thurlaston and consists of the entirety of the area that lays between the town and the two villages; see Image BLADE 2.1 and 4.1 above.
- 5.2. The evidence base makes it clear that Thurlaston and Dunchurch are not physically and perceptually connected to Rugby in the north, with these villages located outside of the town's settlement boundaries as defined by the adopted Local Plan – excluding the South West Rugby urban extension allocation (which has yet to be built out).
- 5.3. The additional development at the South West Rugby urban extension allocation to the north of the A45/M45 and Symmetry Park within its extensive employment and distribution buildings will result in the extent of the urban projecting beyond the town edge of Rugby and extend south towards Symmetry Park.
- 5.4. The Area of Separation Study (November 2025) Green Gap Study highlights the gap between Rugby-Dunchurch-Thurlaston is *'relatively weak due to the proximity of the settlements and the presence of urbanising influences within the assessment area. Furthermore the construction of the South West Rugby urban extension is likely to diminish the gap further'*.
- 5.5. The evidence base highlights the importance of the land to the north of the A45/M45, with the Promotion Site situated to the south of this arterial route. However, the evidence also highlights that this *'open countryside to the north of Coventry Road and the mature trees along the field boundaries which shall act to separate Dunchurch and Thurlaston from the South West Rugby urban extension'*.
- 5.6. However, the Promotion Site is situated to the south of this arterial roadway, man-made and natural features which the LPA considered to be important in their review to define the Area of Separation and ensure that existing settlements retain their own identity and do not coalesce.
- 5.7. There is limited intervisibility between Thurston and the southern settlement edge of Rugby, or from the west of Thurlaston in open countryside between Thurlaston and Dunchurch, with views restricted by intervening tree groups and vegetation along the A45/M45, small tree belts and woodland blocks around Dunchurch.
- 5.8. The Promotion Site is situated on the peripheral edge of the proposed Area of Separation and is ancillary to the land and features highlighted as being important in defining the separation of settlements, adjunct to the A45/M45. The development of the South West Rugby urban extension would be away from this location and further beyond the Coventry Road. However, the Promotion Site is adjunct to this and divorced from the wider land area, spatially isolated south of the A45/M45.

- 5.9. In their evidence, the LPA states the importance of the land around Thurlaston as being *'open countryside that encloses Main Street, Thurlaston, which is particularly important for maintaining a rural setting on the approach to the village'*. However, from our field-based assessment, BLADE judges that land situated between Thurlaston and Dunchurch would be of greater importance in defining the separation between the two villages, and through restricting development, maintaining the identity of each village.
- 5.10. The open agricultural land surrounding Thurlaston influences the sensory and perceptual character of the setting to the village. However, land between Thurlaston and Dunchurch to the east would be more important in defining the spatial gap and maintaining a rural setting, only with the Promotion Site to the east primarily playing a role in maintaining the setting to the village.
- 5.11. This is further the case as the next outlying settlement to Thurlaston is Bourton on Dunsmore, circa 3km west. Given the enclosed nature of the Promotion Site restricted by the A45/M45, woodland, extensive golf course and hotel, as well as intervening landform; coalescence is not possible (physically or perceived) with Bourton on Dunsmore.
- 5.12. In the available views of the land south of the A45/M45, tree groups, woodland and the village edge of Thurlaston exert an influence on this land, with the nearby employment and distribution buildings at Symmetry Park around the road interchange create a wider urban influence. However, the Promotion Site is experienced as a large area of agricultural land, but visually separated from the wider open countryside to the west by its enclosed nature, and visually separate from Dunchurch and the wider town edge of Rugby.
- 5.13. Given the foregoing, BLADE judges that the Promotion Site is situated within a land parcel which is isolated and adjunct from the wider proposed Area of Separation, and one which is enclosed by extensive tree groups and woodland, being experienced remote from the wider town's edge, and isolated from the proposed South Rugby Urban Extension.
- 5.14. It is clear that this land contributes to the setting of Thurlaston village, and affords a limited, if no contribution to defining the Area of Separation and ensure that existing settlements retain their own identity and not coalesce. This land is adjunct to the wider proposed Area of Separation situated north of the A45/M45 arterial route.

6.0 DEVELOPMENT IMPACTS ON THE PROPOSED AREA OF SEPARATION

- 6.1. Policy EN4 of the Rugby Borough Council Local Plan Proposed Submission 2025-2042 (issued January 2026), states that there are two purposes to the proposed Areas of Separation; those being:
- Protecting the identity and distinctiveness of settlements; and
 - Preventing the coalescence of a settlements.
- 6.2. Policy EN 4 'Areas of Separation' states that development proposals will only be considered favourably where:
- It will not have a significant adverse impact, either alone or in combination with other existing or proposed development, on the effectiveness of an Area of Separation.
 - It will not diminish physical and visual separation, have an urbanising influence, or which adversely impact settlement identity.
- 6.3. It is noted that Policy EN 4 does recognise that Applicants proposing development '*that may have an adverse impact on an Area of Separation must demonstrate that they have considered this impact and have incorporated appropriate mitigatory measures into their proposal*'.
- 6.4. Notwithstanding concerns expressed earlier in this Landscape Technical Note regarding the LPA's Methodology, BLADE has examined the Promotion Site against the LPA's Methodology criteria, and so determine the likely impacts from the development of the Site upon the potential function of the proposed Area of Separation. This is set out below:

Table BLADE 6.1: Assessment of effects from developing the Promotion Site within the proposed Rugby– Dunchurch and Thurlaston Area of Separation

Area of Separation Criteria	Proposed Rugby– Dunchurch and Thurlaston Area of Separation
Settlement Identity	
<i>It is an important part of a settlement's setting</i>	Land northeast and east of Thurlaston is important to the setting of the village to (i). define the setting of the village; and (ii). forms open, undeveloped land between Thurlaston and Dunchurch restricted coalescence between settlement. Development at the Promotion Site would be west-northwest of the village, and if built out, new development would be no closer to Dunchurch than the existing dwellings at Thurlaston. The Promotion Site is managed as open agricultural land, which is commonly found around the edge of Thurlaston. The Site is typically enclosed by the A45/M45, tree groups, woodland and the golf course. Development at the Site could be designed to enhance the existing landscape fabric within the Site, re-establish lost hedgerows and hedge lines and preserve aspects of the Site as open and undeveloped.
<i>It features prominently in the views to and from the settlement</i>	Development will not impact upon the tree cover along the A45/M45 as well as that which encloses the wider Promotion Site. The wider urban features of built form at Symmetry Park will further enclose the Site from the north. Landform within the Promotion Site is not elevated, prominent or sloped, and new built form can be set well back within the Site's boundaries.
<i>It provides a clear sense of arrival to or departure from the settlement</i>	As demonstrated through our field-based assessment, the land at the Promotion Site affords only a limited role in defining a sense of arrival and departure into Thurlaston. Development in this area would influence this arrival. However, the village has only a single road in and out, and here is limited perception of the wider open countryside beyond due to roadside tree groups, and development would not impact upon the tree cover along roads. Development at the Site could be designed to enhance the existing landscape fabric within the Site, re-establish lost hedgerows and hedge lines and preserve aspects of the Site as open and undeveloped. New built form can be set well back within the Site's boundaries. Mature vegetation would be retained and bolstered as part of a development, with new planting established, which will reduce views to and from the village edge, as well as along the PRoW running south of the Site (and through the neighbouring golf course).
<i>It contributes positively to a conservation area</i>	Overall, open and undeveloped land which affords direct views to the open countryside, or vista out with of the Conservation Area are not within the Conservation Area. Given this, BLADE judges that the Promotion Site is not prominent in its position relative to the Conservation Area, and views to the Promotion Site are not intrinsically important to the character of the Conservation Area.

Physical and Visual Separation	
<i>It contributes to a broad gap between settlements</i>	Development at the Promotion Site would not bring the settlements physically closer.
<i>It has land cover or a topography which restricts intervisibility between the settlements</i>	The topography, and the presence of trees and vegetation along the M45 and Coventry Road which act to screen the village, and it is these physical features which contain the Site, and segregates it from the wider area being proposed by the LPA.
<i>It has a clear physical feature that marks the settlement edge</i>	<p>The Promotion Site is situated west of Thurlaston, yet the next outlying settlement to Thurlaston is Bourton on Dunsmore, circa 3km west. The effect of intervening landform, golf course and wooded blocks reduce the intervisibility between these two settlements, and the wider man-made and natural features enclose the Site to contain any new development within. Consequently, it is judged by BLADE, that the Promotion is not prominent between these two settlements.</p> <p>The sense of transition will remain with a clear experience of leaving one settlement before entering another. Thurlaston will remain set within its vegetation context and offset from new and emerging development from intervening open fields and the mitigation measures setting new built form well within the Site's boundaries, enhancing and bolstering landscape fabric.</p>
<i>It does not contain direct vehicular links between settlements</i>	The Promotion Site does not contain direct vehicle links between settlements. New access can be formed from the A45/M45 roadway.
Urbanising Influences	
<i>It lacks any development, or the development which exists is rural in character</i>	Development at the Promotion Site would introduce new built form. Whilst the Site does not contain built form it is neighboured by Symmetry Park and is enclosed by the golf course and Draycote Hotel complex.
<i>It lacks infrastructure associated with human activity</i>	The land is managed for agriculture but is enclosed by extensive man-made features including the A45/M45 arterial route and built form thereof at the road interchange. Land to the east, south and western edge of the village has a more prevailing rural character.

<p><i>It has natural or semi-natural land uses, such as woodland or wetlands</i></p>	<p>Development would not result in any removal of mature field boundaries or roadside vegetation where this would increase views of development. Development would retain these features, and would through landscape design enhance and bolster its character, as well as providing mitigation planting which is reflective of the local landscape character, and which neighbour the Site's position. The approach to character within the Proposed Development and how it relates to the positive aspects of character.</p>
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6.5. Given the foregoing, development at the Promotion Site would not result in the physical, visual or perceptual merger of Rugby- Dunchurch – Thurlaston, and would still enable the meaningful performance of the wider Area of Separation as being proposed, and compliance with Policy EN4.

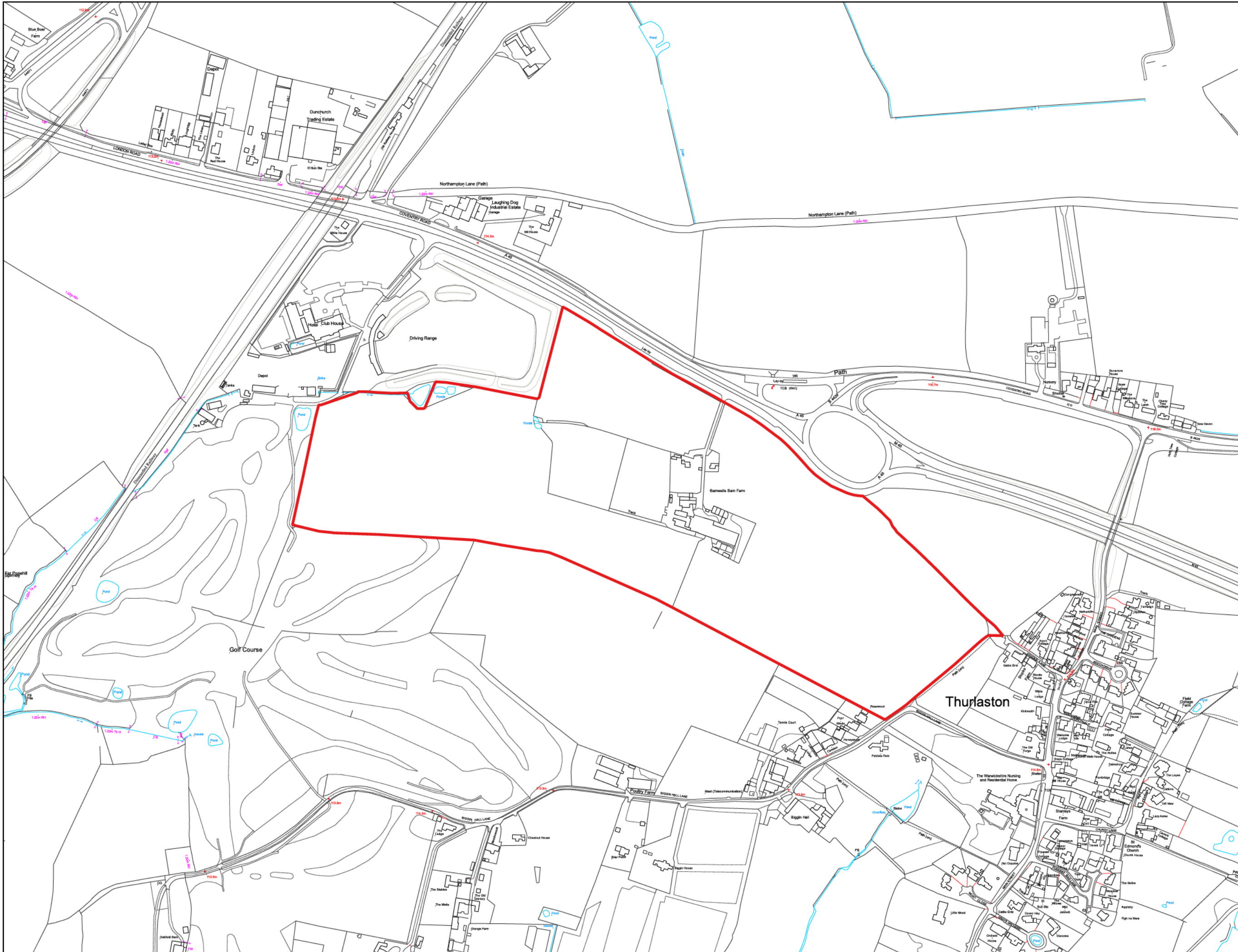
7.0 CONCLUSION

- 7.1. It is judged that development within the Promotion Site would not impact adversely on the characteristics that influence separation between the settlements of Rugby- Dunchurch – Thurlaston. Moreover, given the Promotion Site is situated south of the A45/M45 which isolates this land adjunct to the wider proposed Area of Separation, development at the Promotion Site would still enable the function of this separation area.
- 7.2. As demonstrated, a future development at the Promotion Site would not result in the physical or visual merger of the settlements and there will remain a clear experience of leaving one settlement before entering the other, as well as maintaining the character of each settlement.
- 7.3. As demonstrated above, the land at the Promotion Site has limited relevance to the wider proposed Area of Separation; being isolated to the south of the A45/M45 roadway and adjunct to the wider open area between Rugby and Dunchurch. Consequently, the land's purpose to prevent settlements coalescing is limited to benign in its contribution.
- 7.4. Furthermore, the land at the Promotion Site is located within the setting of Thurlaston village. Land northeast and east of Thurlaston is important to the setting of the village to (i). define the setting of the village; and (ii). forms open, undeveloped land between Thurlaston and Dunchurch restricted coalescence between settlement. Development at the Promotion Site would be west-northwest of the village, and if built out, new development would be no closer to Dunchurch than the existing dwellings at Thurlaston. Its role must, therefore, be purely spatial.
- 7.5. The Proposed Development would result in a physical encroachment into the area surrounding the village, as would be expected with greenfield development. However, landscapes are not experienced in two dimensions on mapping, but on the ground when passing through the area. A future development at the Promotion Site can be designed to set new built form within its extensive boundaries, retaining, bolstering and enhancing existing landscape fabric.
- 7.6. In conclusion, the Promotion Site affords little, if any contribution to the provision of the proposed Rugby- Dunchurch – Thurlaston Area of Separation; and moreover, the control of new development at the Promotion Site can be controlled through the landscape pertinent policies of the engaged local planning policy, as well as through the adoption of policy EN2 of the Rugby Borough Council Local Plan Proposed Submission 2025-2042 (January 2026).
- 7.7. In this Landscape Technical Note, we have expressed our concerns on the Methodology and Approach of the Rugby Borough Council's Area of Separation Study (published November 2025), which seem poorly explained, lacking in clarity and deficient, lacking in the definition of terms, and their detail of terms.

- 7.8. In any case, it is clear that the Promotion Site provides little if anything to preventing the coalescence of Rugby-Dunchurch–Thurlaston relative to Policy EN 4 of the Rugby Borough Council Local Plan Proposed Submission 2025-2042. Consequently, the omission of the land at the Promotion Site as part of the proposed Area of Separation would not impact the ability of the Area of Separation to function well.

APPENDIX BLADE 1

Site Location Plan



3215/3216
Barnwells Barn
Farm (East &
West)
26.16 HA

0 50 100 m
1:5,000at A3

 **Warwickshire
County Council**
Property Management, Resources
Directorate
Warwickshire County Council,
Shire Hall Warwick CV34 4RL
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100019520

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Registered Office: 30 St Georges Square, Worcester, WR1 1HX.

Warwickshire Property and Development Group

Barnwell Farm, Land South of Coventry Road.

Rugby Local Plan

Proposed Submission Local Plan Consultation (Regulation 19)

March 2026



1. Introduction

1. The following representations are made in response to the Rugby Proposed Submission Plan Consultation (Regulation 19) on behalf of Warwickshire Property and Development Group, in respect of their land interest at Barnwell Farm, Land South of Coventry Road, (SA Site Ref: 18)
2. These representations are made on behalf of Warwickshire County Council (WCC) as land owner by Warwickshire Property and Development Group (WPDG) which was launched by Warwickshire County Council to contribute positivity to the delivery of its Commercial Plan priorities through delivery of a range of commercial and mixed-use development and through delivering new affordable and market priced homes.

EN4 Areas of Separation

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

Paragraph	5.8 and 5.9
Policy	EN4
Policies Map	
Site ID	18

Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input 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 type="checkbox"/>	No	<input type="checkbox"/>

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.

4. Policy EN4 Areas of Separation. Not Sound.

Overall Policy.

- Within the Proposed submission version of the Plan a new policy is proposed, EN4 Areas of Separation. The purpose of this policy is to protect the identify and distinctiveness of settlements and prevent their coalescence. The National Planning Policy Framework 2024 (NPPF) at Paragraph 16 criterion c) advises that Plan-making should “be shaped by early, proportionate and effective engagement between plan-makers and communities, businesses”. To support the inclusion of the new policy, new studies have been commissioned which are available for review as part of the consultation.
- It is considered that the late inclusion of this Policy, at the submission version of the Plan, does not allow for sufficient time or provide the opportunity to undertake

meaningful engagement with the Council and is therefore contrary to the advice set out in the NPPF.

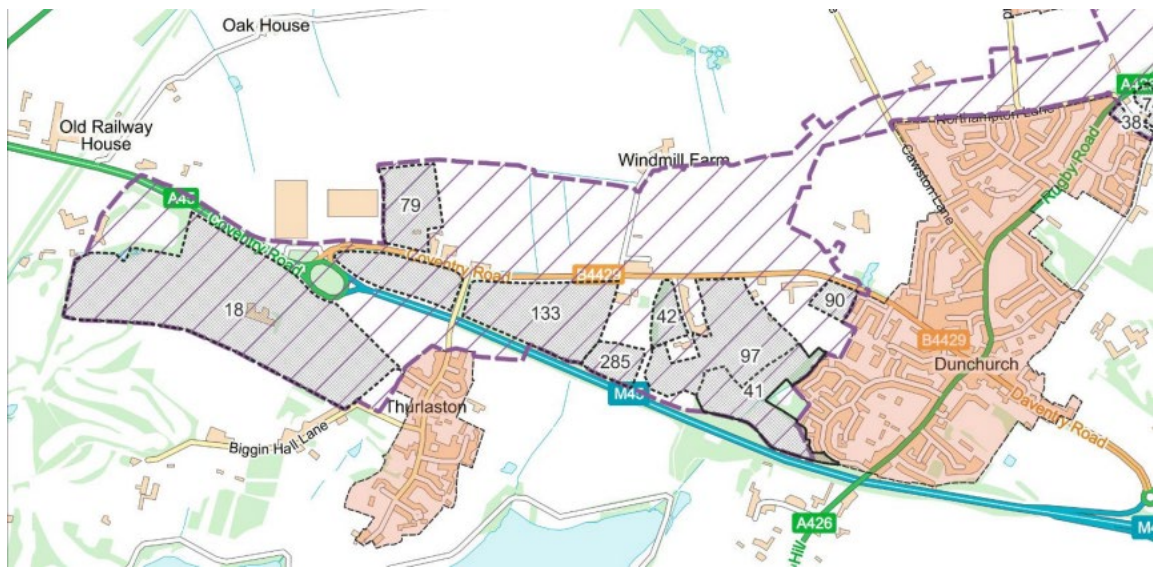
7. The policy is not justified as it is not supported by proportionate evidence, which is clear and fails to provide a robust justification for the policy.
8. The policy is a criteria-based policy, setting out the criteria by which development will be assessed and considered acceptable.
9. The policy appears to be focused on avoiding coalescence and retain the separate identity of settlements; rather than protecting high quality landscapes in the urban fringe and provide access to the countryside. However, within the Areas of Separation Report, 2025, which it is understood to be the main technical evidence base to justify the new policy there is no reference or a list of criterion by which to assess the “identify and distinctiveness of settlements”. Only an assertion that the evaluation of settlement “primarily relies upon information drawn from conservation appraisals and parish or neighbourhood” (paragraph 5.6). As a result, it is considered that the approach adopted lacks clarity and transparency and does not provide a criterion for an independent assessment. This is a fundamental flaw within the evidence to justify the policy’s inclusion within the Plan and this therefore Not Sound.
10. There is a lack of definition of terms relating to the evidence base for the policy. Paragraph 5.7 of the Areas of Separation Report 2025, advises that land within an assessment area is deemed to make a stronger contribution to settlement identify and lists four criteria, however, there is no methodology to determine how “Strong contribution” is defined or indeed any information to say what less than a strong contribution means.
11. The same lack of definition relates to how “*important part*” of settlements have been defined, along with “*it features prominently in the views to and from the settlement*” and how prominent and positive contributions have been arrived at, without this information it is not possible to understand how this has been judged.

12. Concern is also raised over the criteria assessing the nature of arriving and departing to and from the settlement, it is not known where this is being assessed from, for example what types of routes would the receptor be passing along.
13. In addition, there is also a lack of definition in terms of the approaches taken for the physical and visual separation and the urban influences, with only a definition given for *stronger contribution*.
14. The methodology used to inform the policy is insufficient as it is inadequate and lacks clarity. The methodology does not demonstrate how the relative importance of the land parcels has been defined.
15. It is unclear as to what specialist technical input has been utilised in the preparation of the report, for example, heritage, conservation officer, landscape architect. The methodology section refers to a desk top based exercise being undertaken supplemented by planning officers have walked through and around the assessment area.
16. In summary the policy is Unsound as it is not justified for the following reasons.
 - The published Methodology/Approach is deficient, lacking in the definition of terms, and their detail of terms.
 - The LPA's methodology is insufficiently explained and lack clarity for an independent assessment.
 - The use of the published Methodology/Approach in the 2025 seems to have been used to only support higher contribution land (in order to support their justification of the enforcement of the Area of Separation advocated by the LPA).
 - The Methodology lacks detail and appears to be poorly explained and is insufficiently robust.
 - There is a lack of defining the scope and purpose of the study.
 - Who undertook the assessment and field-based assessment, their qualifications and experience i.e., Planner, Masterplanner, Landscape Architects?
 - Time of year when the field-based assessment was undertaken?

17. As a result the policy and the evidence base used to support the policy is not justified as it fails to take into account reasonable alternatives that could have been used as opposed to proposing an Area of Separation Policy.

Site Specific comments on the Barnwell Farm site.

18. The inclusion of the Barnwell Farm site within the Areas of Separation Policy is not justified or evidenced so is therefore Unsound.
19. Within the Areas of Separation report, November 2025, Chapter 7 sets out the context and justification for the Rugby – Dunchurch and Thurlaston Assessment. Paragraph 7.34 makes specific reference to the open countryside to the land north of Coventry Road, which shall act to separate Dunchurch and Thurlaston from the South West Rugby urban extension. At paragraph 7.26 reference is made to site 18 (Barnwell Farm) with the assertion made that development of the site would diminish the degree of separation between Thurlaston and Rugby and being located within 10metre of the village's western boundary, at its nearest point that development in this location would have a detrimental effect on the settlement.
20. As can be seen on the Plan below. Site 18, Barnwell Farm is not located between Dunchurch and Thurlaston. It is located to the west of Thurlaston. There is no evidence to justify why the Barnwell Farm site has been included within the Area of Separation designation. The assertion that development of the site would be in close proximity to the village is not founded in any technical work. The site could come forward taking into the location of the village and developed in such a way that the impact of any development on the village could be mitigated, minimised and acceptable in planning terms. No evidence has been produced to justify the comments made, with no opportunity provided to address concerns raised on that basis the site's inclusion is therefore considered unsound.



21. As set out about WPDG consider that Policy EP4 is not justified and should be deleted from the Plan. If the Policy is supported, then the removal of the site from the EP4 designation is sought given there are no site-specific reasons for its inclusion within the Policy.

22. The accompanying landscape technical note, dated March 2026, produced by Blade provides a detailed analysis of the proposed policy and the evidence base published to support the proposed Area of Separation Policy which confirms that the evidence base relied upon is not robust and fails to justify the inclusion of the policy within the Plan.

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.

23. Policy EP4 should be deleted from the Plan and if the policy is retained The Barnwell Farm site should be removed from the EN4 Area of Separation Policy on the proposals map.

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

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

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

24. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

Policy S3

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

Paragraph	
Policy	S3
Policies Map	
Site ID	18

Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input 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 type="checkbox"/>	No	<input type="checkbox"/>

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.

25. The policy is not justified as it is not supported by proportionate evidence and fails to provide a robust justification for the policy.

26. The concerns raised in our response to the Preferred Options consultation remain, the Councils evidence is not clear, not easy to understand and fails to allocate sufficient employment land within the Plan. The Plan fails to allocate the Barnwell Farm site as an employment allocation.

27. The Council has produced an Alignment Paper Addendum dated November 2025, which seeks to address the comments and concerns made during the previous consultation on the Preferred Options and the Alignment Paper produced as part the evidence base published at the same time as the Preferred Options consultation.

28. However, again the evidence contained within the updated Addendum is not clear with the evidence base used to justify the need for employment land within Rugby being largely out of date. Of note, the Addendum acknowledges this, commenting that this is not an issue. WPDG are of the opinion that this does matter and contend that the failure not to use up to date evidence results in a lack of employment needs being identified and a lack of employment sites allocated and therefore considers the Plan unsound.
29. Despite previous concerns raised over the lack of employment land proposed to be allocated the Council are still proposing a similar floorspace, however, with revisions made to the proposed allocations.
30. The Rugby Development Needs Topic Paper (December 2025) sets out how the employment need figure has been reached. However, it fails to address the additional needs that arises and which needs to be accommodated as a result of the shortfall identified in employment land at Coventry Gateway South, Opportunity Area 7, which falls within Coventry's administrative area, identified in the WMSESS. The shortfall identified was 90ha, however only 50ha is being proposed, it is considered that the full 90ha shortfall should be provided for. Of note, even with this identified shortfall the Council are still only proposing to allocate a similar level of employment land. Indeed, no land is allocated to address employment land shortfalls within the wider conurbation.

Stage 2 Site Options Assessment December 2025.

31. Within the Stage 2 site options assessment undertaken by the Council, the key concerns raised relating to the Barnwell Farm site are the highway and heritage impacts and the coalescence/loss of separation that would result.
32. In terms of the highway issues raised, they appear to relate to the impact of the development on the highway and maintain that these could not be easily mitigated, concern that the capacity arising from the new Homestead Link Road will be used by other developments and lack of accessibility.

33. The NPPF 2024, paragraph 115 advises that when assessing sites for allocation for development in Plans that

- a) Sustainable transport modes are prioritised taking account of the Vision for the site, the type of development and its location;
- d) Any significant impacts from the development on the transport network or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

34. Furthermore, paragraph 116 of the NPPF advises that;

“Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”.

35. The significant change here is the need to adopt a Vision Led approach, this does not appear to have done and is therefore considered to contrary to the NPPF.

36. The Site has unconstrained access to the A45 / M45 Thurlaston Interchange junction to its immediate north, providing efficient access for HGVs and other vehicles. The site has been modelled, and it has been confirmed that access can be achieved from the M45/A45 interchange.

Thurlaston Conservation Area

37. In relation to the concern over the heritage impacts, namely in relation to the Thurlaston Conservation Area the commentary provided acknowledges that the level of potential harm would depend on the location, scale and type of developments, and states that large-scale commercial development in the eastern half of the site to create significant impacts.

38. Given the size of the Barnwell Farm site there is the opportunity to develop a range of employment buildings at different sizes, and for a well-designed landscaping buffer to be provided to mitigate and minimise impacts on the Conservation Area.

Draycote Meadows SSSI

39. The Site is sufficiently separated from the Draycote Meadows SSSI by the Whitefields Golf Club. Furthermore, landscaping, planting, and the retention of green buffers surrounding any built development will deliver sufficient protection for on- and off-site habitats.

Coalescence/loss of separation.

40. As set out above the concern raised into the coalescence and loss of separation is refuted.

Deliverability of the site.

41. The Barnwell Farm site is within single ownership, has a willing seller and there is developer and market demand for commercial space of varying size.

42. Given the unique nature of WPDG, WPDG would look to deliver small SME commercial space where there is an evident need and demand and lack of current delivery alongside plots for larger floor space delivery to meet a diversity of occupier requirements providing an holistic support for SME businesses and job creation.

43. As set out in our previous representations Rugby has an advantageous position for the provision of employment land, given its location and should maximise its potential to support economic growth and productivity a requirement of the National Planning Policy Framework 2024.

44. Since the publication of the Preferred Options consultation, the government has consulted on a revised NPPF, December 2025, it is acknowledged that this is consultation, however the importance of supporting economic growth is still a key requirement.

45. As set out in our previous comments Barnwell Farm site is ideally positioned and aligned to continue the growth of the logistics, warehousing and distribution growth with the area.

Response made to previous consultation for ease of reference.

Employment Need Evidence

Whilst Warwickshire Property Development Group do not disagree with the allocations made with the Preferred Options draft Local Plan, the Group raise into question the employment need evidence to ensure that Rugby Borough Council have accounted for **all** of the economic need of Borough and are making the appropriate amount of allocations to account for this need.

The Council's evidence in regards to the amount of employment land required for the Plan period 2045 does not account for the latest completions data to 2023/24 as a Plan period which begins in 2024 should do. Rather, the West Midlands Strategic Employment Sites Study (WMSESS) only accounts to 2021/22. This issue is not resolved by the HEDNA-WMSESS Alignment Paper as this does not provide sufficient detail, and whilst Rugby has experience growth in the sector in recent years, the Alignment Paper comes to contrasting conclusions.

As a result, the Council has not applied the latest completions data in determining their future need, despite these completions most accurately reflecting the state of the modern logistics market.

The most recent Authority Monitoring Report (AMR), dated to 2023/24, outlines that Rugby has seen 200.8ha of B2 / B8 and mixed-use completions. Extrapolating these completions over the 21-year Plan period would suggest a need of 522ha of industrial / mixed use employment land in Rugby.

522ha is clearly significantly higher than that proposed by the Council, which the Development Needs Topic Paper (DNTP) places at 284ha, of which only 81.5ha is accounted for in the adopted Local Plan. Furthermore, the DNTP also outlines that Coventry has an unmet need for 45ha of employment land which is not proposed to be met in this Local Plan.

Warwickshire Property and Development Group consider that the Council should revisit their evidence base in terms of employment need to ensure that the Plan can continue

through examination as the consequence of under-estimating their employment need this severely could be dire.

Rugby's Advantageous Position

Rugby lies in an extremely advantageous position, at the confluence of the most prominent north-south connection in the UK, the M1 motorway, and significant east-west connections, namely the M6 and M45/A45.

As per Paragraph 86a of the Framework, the Council should positively and proactively encourage sustainable economic growth, with regard to the national industrial strategy, namely the report "Invest 2035: The UK's Modern Industrial Strategy". This strategy identifies "an enormous untapped potential outside the capital".

Alternative Site – Land at Barnwell Farm, Thurlaston (Site ID 18)

Warwickshire Property and Development Group's site at Barnwell Farm, Thurlaston (Site ID 18) is ideally positioned and aligned to continue the growth of the logistics, warehousing and distribution growth in the South West Rugby allocation.

The Site has unconstrained access to the A45 / M45 Thurlaston Interchange junction to its immediate north, providing efficient access for HGVs and other vehicles. There is clear demand for employment development in this location, demonstrated by the pre-letting of units within South West Rugby. The Council should embrace this demand through the allocation of the necessary employment development.

Thurlaston Conservation Area

WPDG understand the Council's concerns regards to the location of the Site in proximity to the Thurlaston Conservation Area. Any potential impacts on the Conservation Area can be assessed through further assessments on the Site and mitigated through a well-designed landscaping and planting scheme for the Site.

Draycote Meadows SSSI

The Site is sufficiently separated from the Draycote Meadows SSSI by the Whitefields Golf Club. Furthermore, landscaping, planting, and the retention of green buffers surrounding any built development will deliver sufficient protection for on- and off-site habitats.

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.

46. The Council should increase the amount of employment land within the Plan and allocated the Barnwell Farm for employment purposes.

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

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

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

47. To respond to the Inspector's questions, elaborate on the points raised, and respond to any further information the Council submits.

