

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official
use only)

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

Rugby Borough Council Proposed
Submission Local Plan

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Joanne"/>	<input type="text"/>
Last Name	<input type="text" value="Jarman"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Willoughby Parish Council"/>	<input type="text"/>
Address Line 1	<input type="text" value=""/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text" value=""/>	<input type="text"/>
Post Code	<input type="text" value=""/>	<input type="text"/>
Telephone Number	<input type="text" value=""/>	<input type="text"/>

E-mail Address

(where relevant)

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

Name or Organisation:

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

Local Plan Paragraph

Local Plan Policy

Policies Map

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

No

(2) is Sound

Yes

No

(3) complies with the Duty to co-operate

Yes

No

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

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

Willoughby Parish Council **supports** the soundness and legal compliance of the Proposed Submission Local Plan 2025–2042 in relation to Lodge Farm (Site 73) and Policy EN3 (Rainsbrook Valley Landscape of Elevated Sensitivity)

The Council **supports** the representation made by Stand Against Lodge Farm (SALFV) to Rugby Borough Council in relation to the matters above. (See SALFV’s representation attached.)

In line with SALFV’s representation, the Council **objects** to any allocation or reintroduction of Lodge Farm and supports the submitted Plan insofar as it does not allocate Lodge Farm.

The Council **strongly objects** to any proposal, whether advanced through third-party representations, promoted modifications, or Main Modifications

during the examination process, to reintroduce or allocate Lodge Farm within the Plan.

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

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

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

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

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

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

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

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

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

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

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

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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.

Willoughby Parish Council welcomes and **supports Policy EN3** but requests that the designated area be extended to include the whole area of the valley within Rugby Borough's boundary.

The INCOLA 'Rainsbrook Valley Landscape Sensitivity Assessment Review 2026' analyses the findings in the 'Landscape Sensitivity Assessment Rainsbrook Valley 2025', prepared by Node for Rugby Borough Council, and notes that the Node assessment

- does not include the wider valley floor that extends south towards the confluence with the River Leam, defined by the promontories that delineate the transition to the wider vale landscape beyond;
- excludes the distinctive ridgeline and slopes of Toft Hill, south of Dunchurch, which form a backdrop in views approaching Dunchurch, affording extensive views across the valley to the south and southeast, as recognised by the Warwickshire County Council 2017 sensitivity study; and

- furthermore, the assessment does not include a significant portion of Barby Hill, the ironstone fringe forming the south-eastern valley side, affording extensive views across the valley's southern portion and out across the transition to the vale beyond.

Based upon the findings of the Node 'Rainsbrook Valley Landscape Sensitivity Assessment 2025', together with the analysis of the Node assessment and numerous important additions provided by INCOLA, their report concludes that the whole of the Rainsbrook Valley is of an overall High Landscape Sensitivity and may meet the criteria for consideration as part of the proposed Rainsbrook Valley Landscape of Elevated Sensitivity designation (Local Plan Policy EN3).

Furthermore, both assessment reports indicate the Rainsbrook Valley within West Northamptonshire, including the southern valley sides and Barby Hill, is also of a high landscape sensitivity and may therefore be considered as an area to be afforded similar recognition within policy.

Willoughby Parish Council hopes that Rugby Borough Council and West Northamptonshire Council, currently consulting on their Regulation 18 Local Plan, can work together to ensure that the beautiful, historic and unique landscape of the Rainsbrook Valley is protected, as far as possible, from any development that would destroy forever this highly susceptible area.

See attached documents:

INCOLA 'Rainsbrook Valley Landscape Sensitivity Assessment Review 2026';
and

'Policy EN3 Rainsbrook Valley - Policy Comments'

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

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Policy EN3 - Rainsbrook Valley Landscape of Elevated Sensitivity

The protection of the Rainsbrook Valley landscape is considered highly important and is strongly supported. Policy EN3 'Rainsbrook Valley Landscape of Elevated Sensitivity' is, therefore, welcomed but we feel should be enhanced in two key regards:

- The proposed designation area should be extended to reflect the full geographic extent of the Rainsbrook Valley within Rugby Borough and the assessment of the whole valley as of high landscape sensitivity.
- Consideration should be given to development outside the designated area that could adversely impact the setting of the designation and the associated views.

These changes are needed to ensure the effectiveness of the policy designation, recognising that the purpose of the policy is to protect the Rainsbrook Valley, and the extent of the proposed designation should reflect the Valley as a whole.

Extent of Designated Area

Warwickshire County Council's landscape sensitivity study, on behalf of Rugby Borough Council - 2017, concluded that the whole northern escarpment of the Rainsbrook Valley was Highly Sensitive and 'inappropriate for development'. To reflect this, it is suggested that the proposed EN3 designation area should be extended to the south-west, to include Toft Hill.

Node's landscape sensitivity assessment, on behalf of Rugby Borough Council – December 2025, concluded that the portion of the Rainsbrook Valley assessed was of High Sensitivity when a development of 50+ houses was considered. The proposed EN3 designation does not fully reflect the Rainsbrook Valley area, within Rugby Borough, assessed by Node as of High Sensitivity. The proposed designation area should, therefore, be extended to the south to correct this.

INCOLA's landscape sensitivity assessment, on behalf of Dunchurch Pools Marina – March 2026, applies the methodology employed by Node so as to assess the remainder of the Rainsbrook Valley that was not assessed by Node, a serious omission. This is the area of the valley south to a line from Toft Hill in the west to Barby Hill in the east. The line marked by a series of promontories and tributaries within the catchment of the Rains Brook and leading to the transition to the vale beyond at the confluence with the River Leam. See attached Plan 3 from INCOLA's assessment showing the extents of the Rainsbrook Valley.

Taking the nine 'value factors', INCOLA's report assesses this remainder of the Rainsbrook Valley as follows:

- Natural Heritage – Moderate Contribution, with ecological designations, priority habitats, higher degree of woodland cover and intact field systems.
- Cultural Heritage – Strong Contribution, with the Oxford Canal, Great Central Railway and areas of intact medieval field systems adding time depth to the landscape.
- Landscape Condition – Moderate to Strong Contribution, with large areas of intact historic field pattern.
- Distinctiveness – Moderate to Strong Contribution, with Barby Hill along with intact historic field patterns, Oxford Canal and Great Central Railway all creating a strong sense of place. The valley here also providing a key contribution to the setting of and arrival to Dunchurch.
- Recreational – Strong Contribution, with well used public footpaths and long-distance trail along with the Oxford Canal, one of the UK's most used and popular inland waterways, and resources such as Dunchurch Pools Marina offering significant tourism and recreational facilities.
- Perceptual (scenic) – Moderate to Strong Contribution, with expansive views across the valley and wider vale from Barby and Toft Hills.

- Perceptual (wilderness and tranquillity) – Moderate Contribution, particularly the tranquil space created by the Oxford Canal and views from Barby Hill across the valley and the wider vale landscape beyond creating a sense of remoteness.
- Associations – Moderate Contribution, with Rupert Brooke’s poem ‘The Chilterns’ being based on his walks from his home at Hillmorton, along the Oxford Canal and up Barby Hill.
- Functional – Moderate Contribution, with green and blue corridors, habitats and green infrastructure.

Based on this, the INCOLA report concludes that it is clear the remainder of the Rainsbrook Valley is also of a High Landscape Sensitivity.

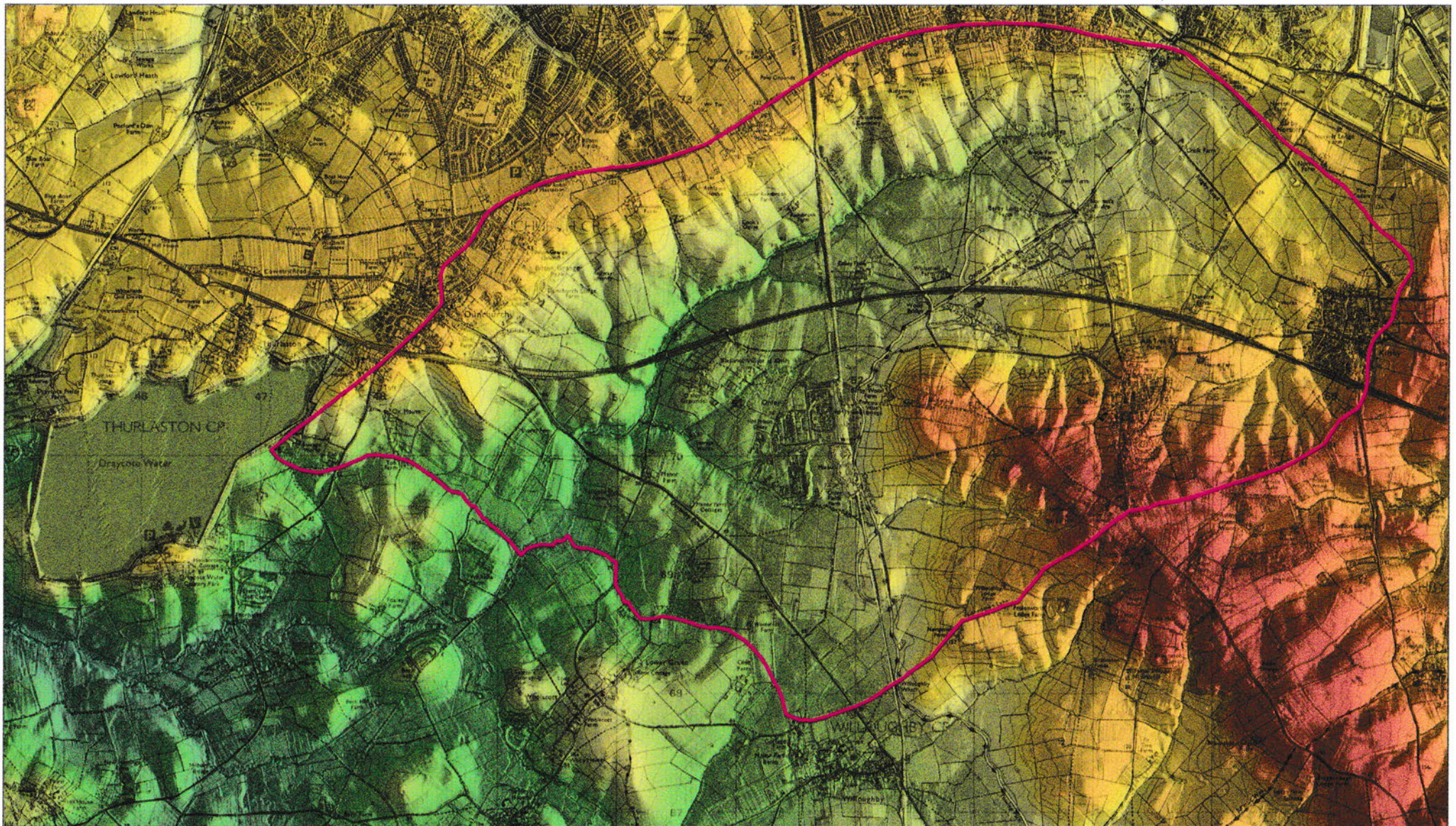
In conclusion, the proposed designation does not encompass the full geographic area of the Rainsbrook Valley within Rugby Borough, assessed as a whole across three material reports as of High Landscape Sensitivity. The EN3 designation area should, therefore, be extended to address this, see attached Appendix 1 from INCOLA’s report showing the Rainsbrook Valley within Rugby Borough.

Adverse Impact of Proximate Development

The three landscape studies of the Rainsbrook Valley, detailed above, all assess the landscape as of High Sensitivity. The assessments include the influence of views beyond the valley confines, especially of the rural vale to the south and south-west. We believe the potential adverse impact of development outside the designated area on the designation should be material in the consideration of the planning balance.

We would, therefore, propose the following modification to Policy EN3 Criteria A;

‘A Within the Rainsbrook Valley landscape of elevated sensitivity as defined on the policies map, development should comply with paragraphs B to E of this policy. Where development would be located outside of, but would influence the designated area, consideration should be given to ensuring that any adverse impacts of development on the landscape are avoided.’



Legend

Scale



50 m

More than 160 m

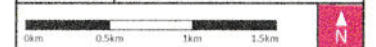
Source: This topography plan has been modelled using GIS computer software (QGIS) and 2020 Composite LiDAR DTM supplied by DEFRA

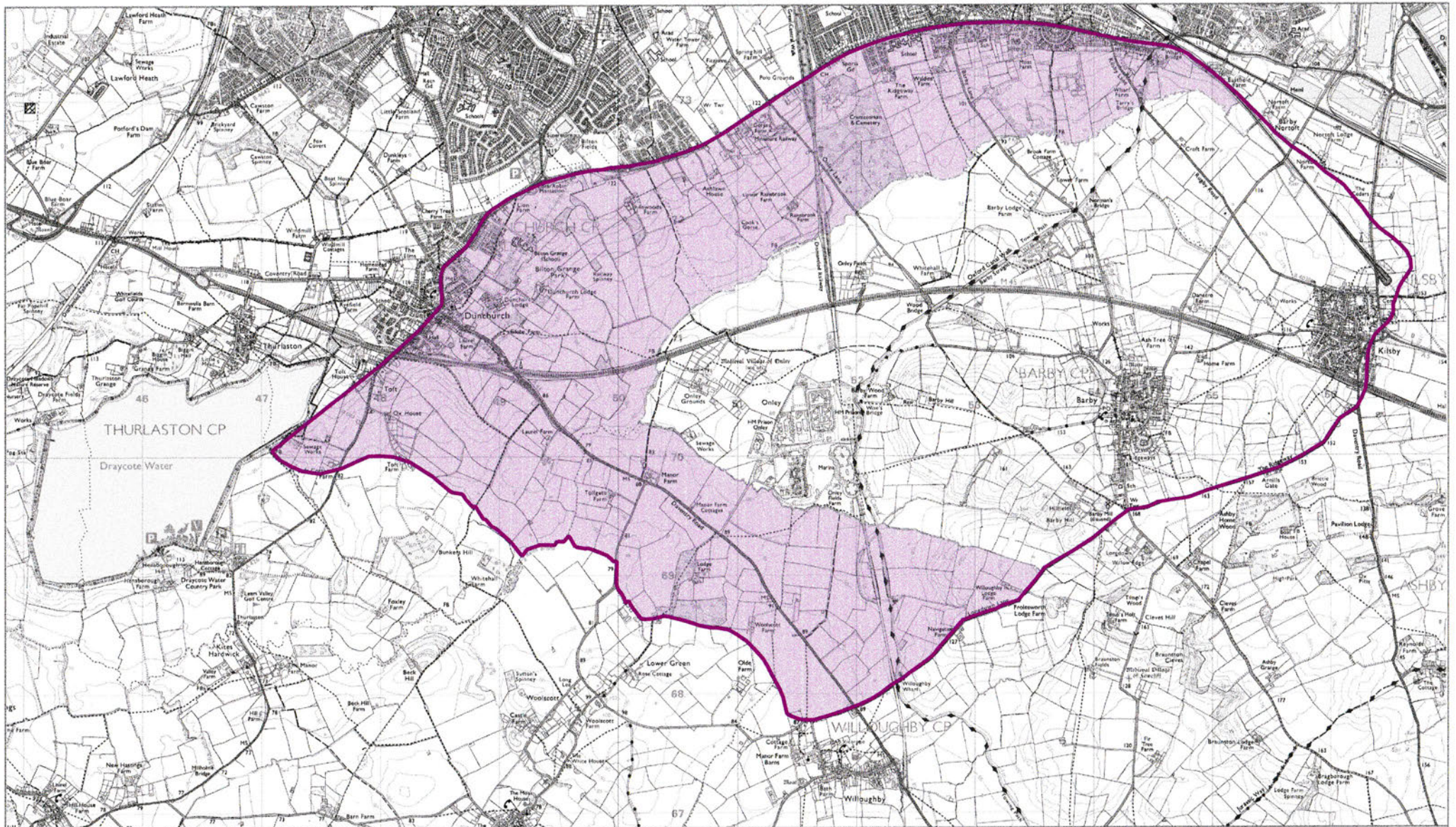


Rainsbrook Valley Extents

Plan 3: Rainsbrook Valley Extents

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





Legend

- Rainsbrook Valley
- Rainsbrook Valley within Rugby Borough

The Rainsbrook Valley within Rugby Borough

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



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



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1 INTRODUCTION

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

RUGBY LOCAL PLAN 2025 – 2042

POLICY EN3 RAINSBROOK VALLEY LANDSCAPE OF ELEVATED SENSITIVITY

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

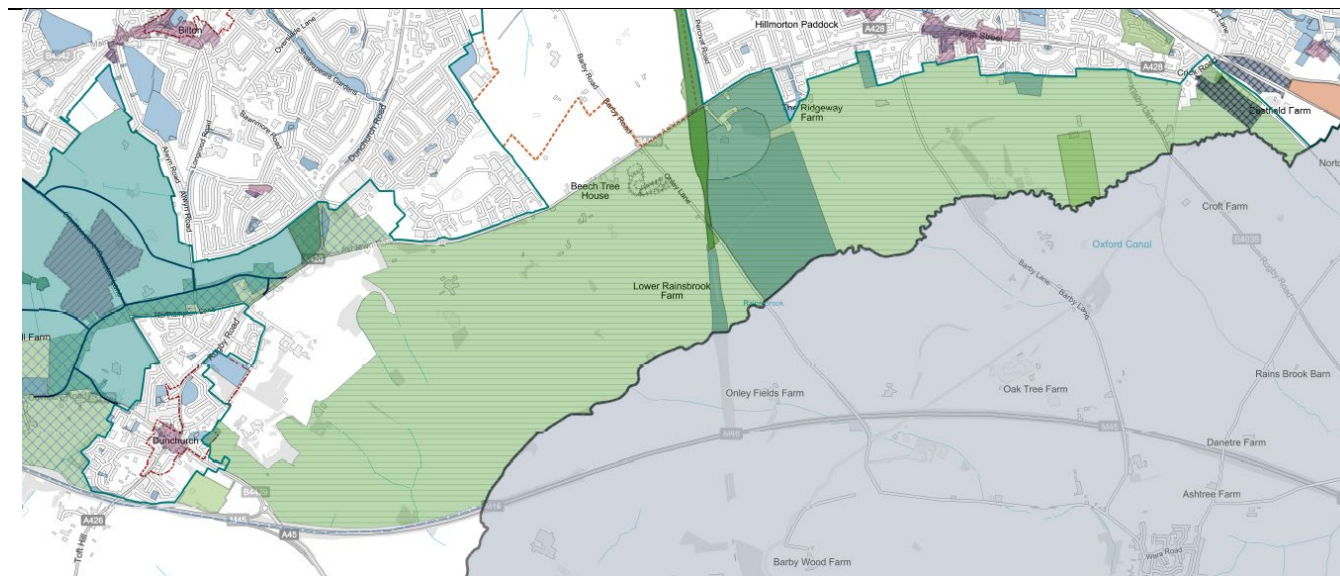


Figure 1-1: Rainsbrook Valley landscape of elevated sensitivity – Draft Policy EN43

1.5 Policy EN3 requires that:

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

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

EXTENT OF THE RAINSBROOK VALLEY LANDSCAPE OF ELEVATED SENSITIVITY

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

RAINSBROOK LANDSCAPE SENSITIVITY STUDY, 2017

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

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

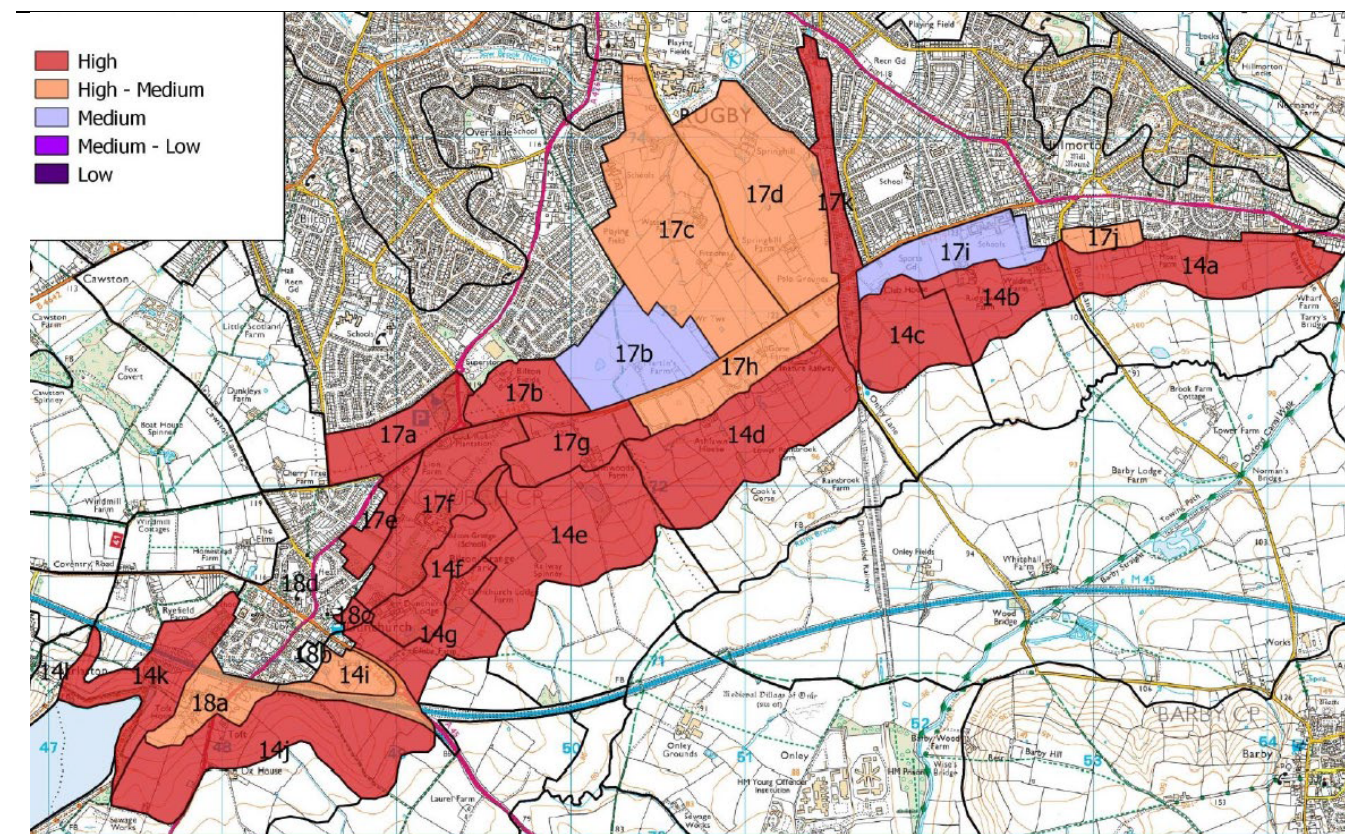


Figure 1-2: Rainsbrook Valley Landscape Sensitivity Study, 2017: Housing Sensitivity Map

RAINSBROOK VALLEY LANDSCAPE SENSITIVITY ASSESSMENT, 2025

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

Landscape Sensitivity Assessment – Additional Area

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

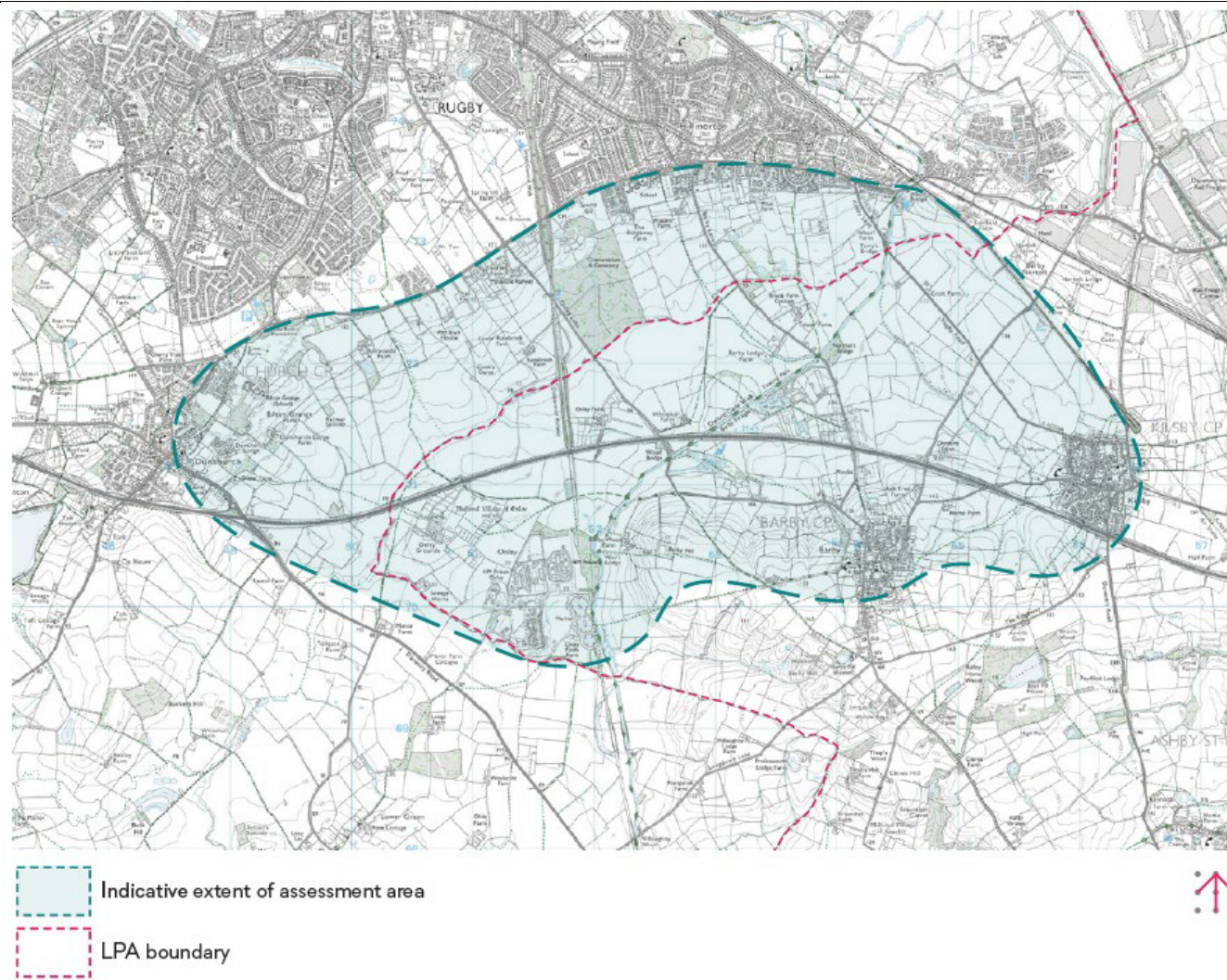


Figure 1-3: Rainsbrook Valley Landscape Sensitivity Assessment, 2025 Assessment Area

SCOPE OF THIS REPORT

Definition of the Rainsbrook Valley

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

Landscape Character Context

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

2 DEFINING THE RAINSBROOK VALLEY

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

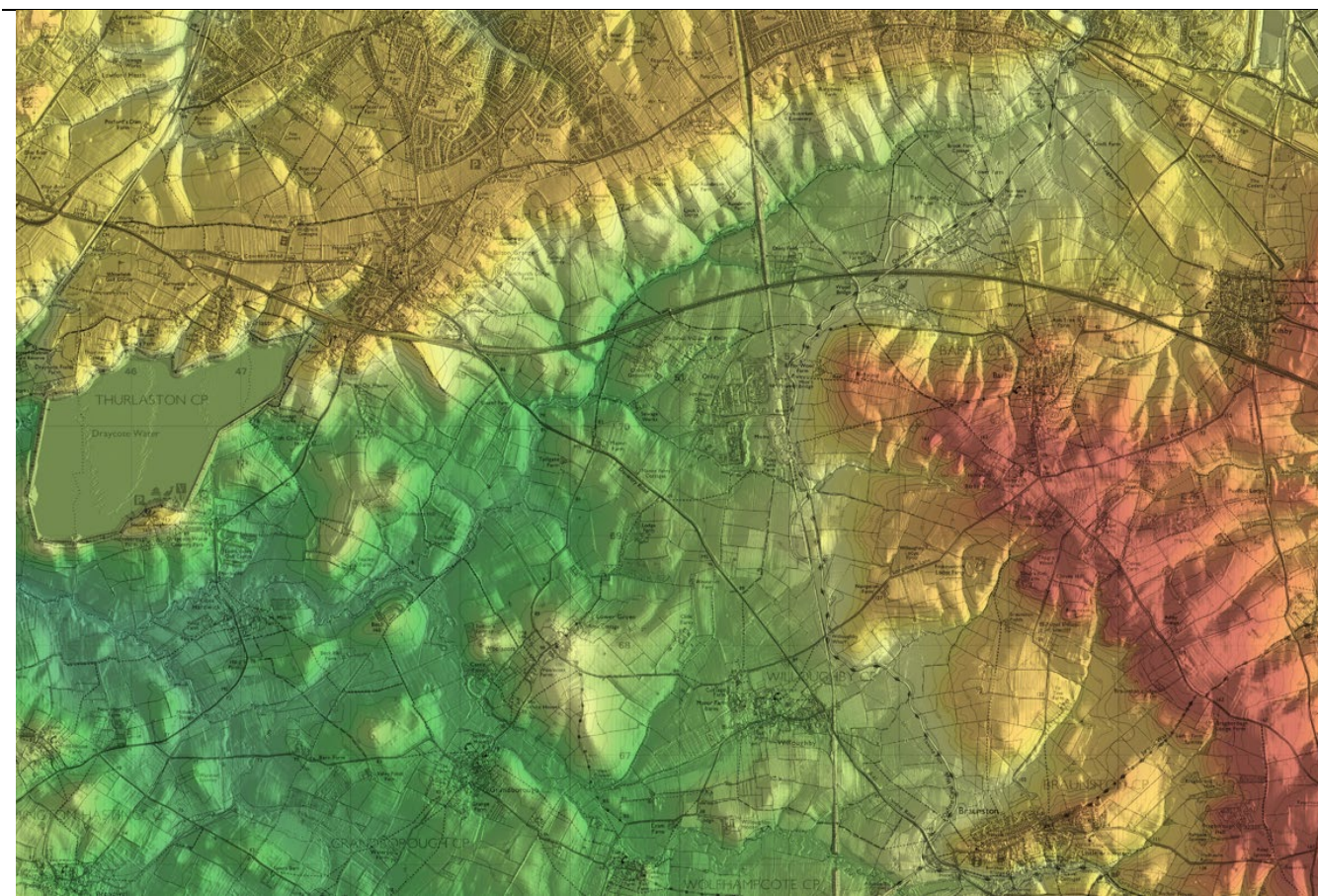


Figure 2-1: Landform and Features of the Rainsbrook Valley - extract of Plan 1

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

RAINSBROOK VALLEY LANDSCAPE SENSITIVITY ASSESSMENT, 2025 – ASSESSMENT AREA

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

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

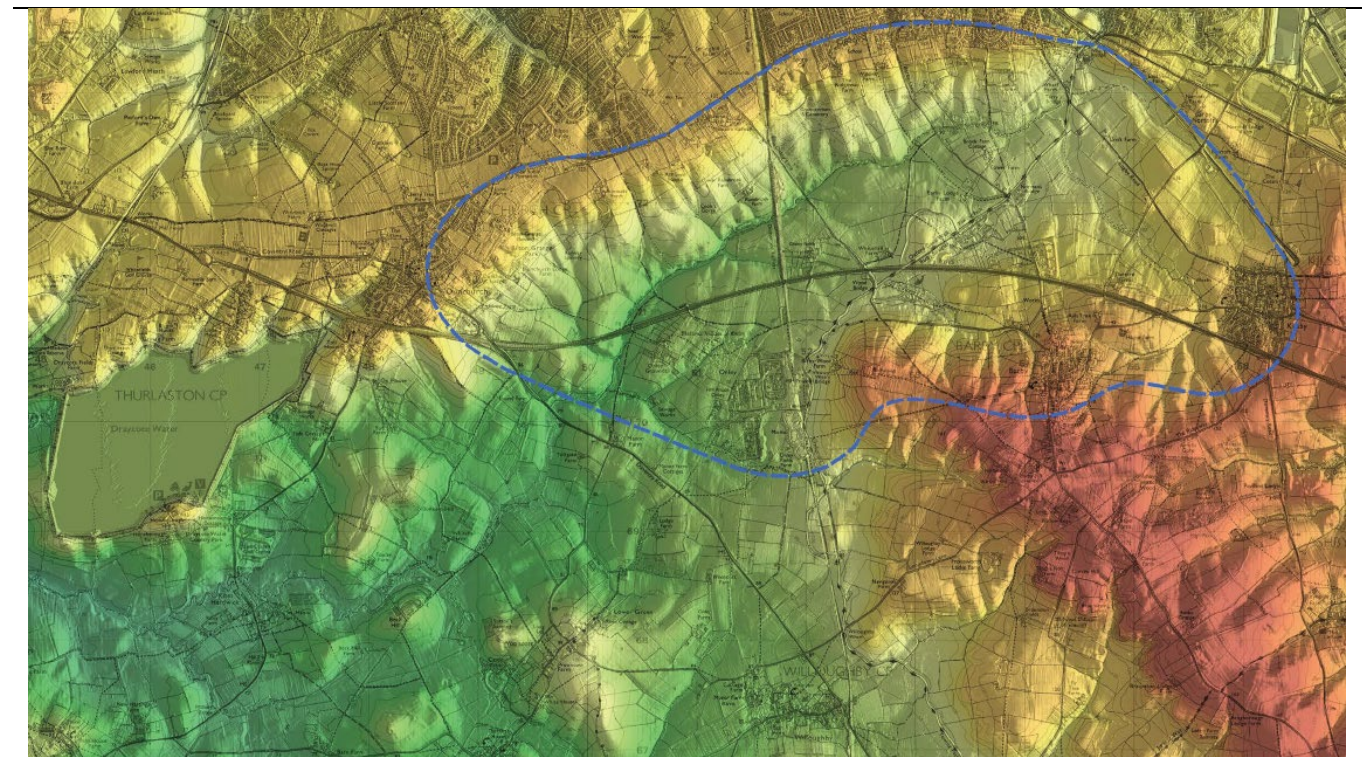


Figure 2-2: Rainsbrook Valley Landscape Sensitivity Assessment, 2025 - Assessment Area

RAINSBROOK VALLEY – WIDER AREA

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

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

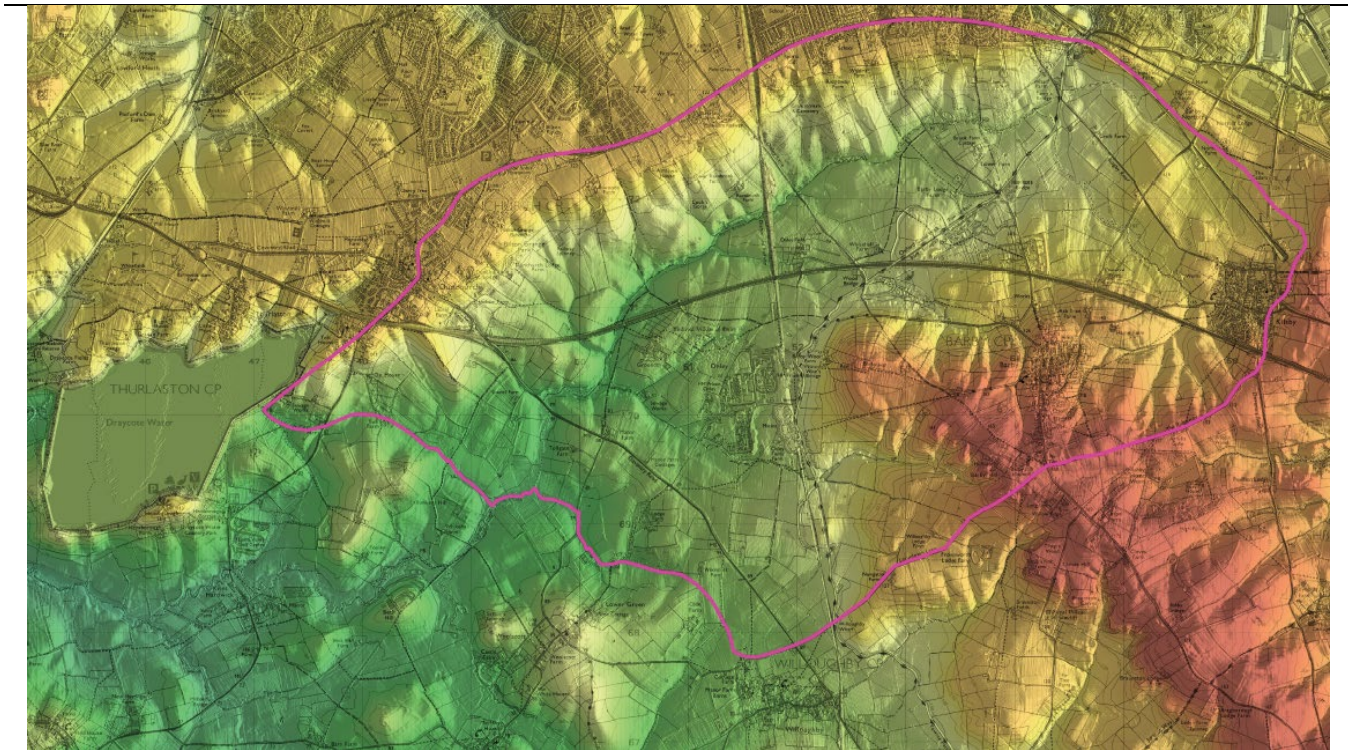
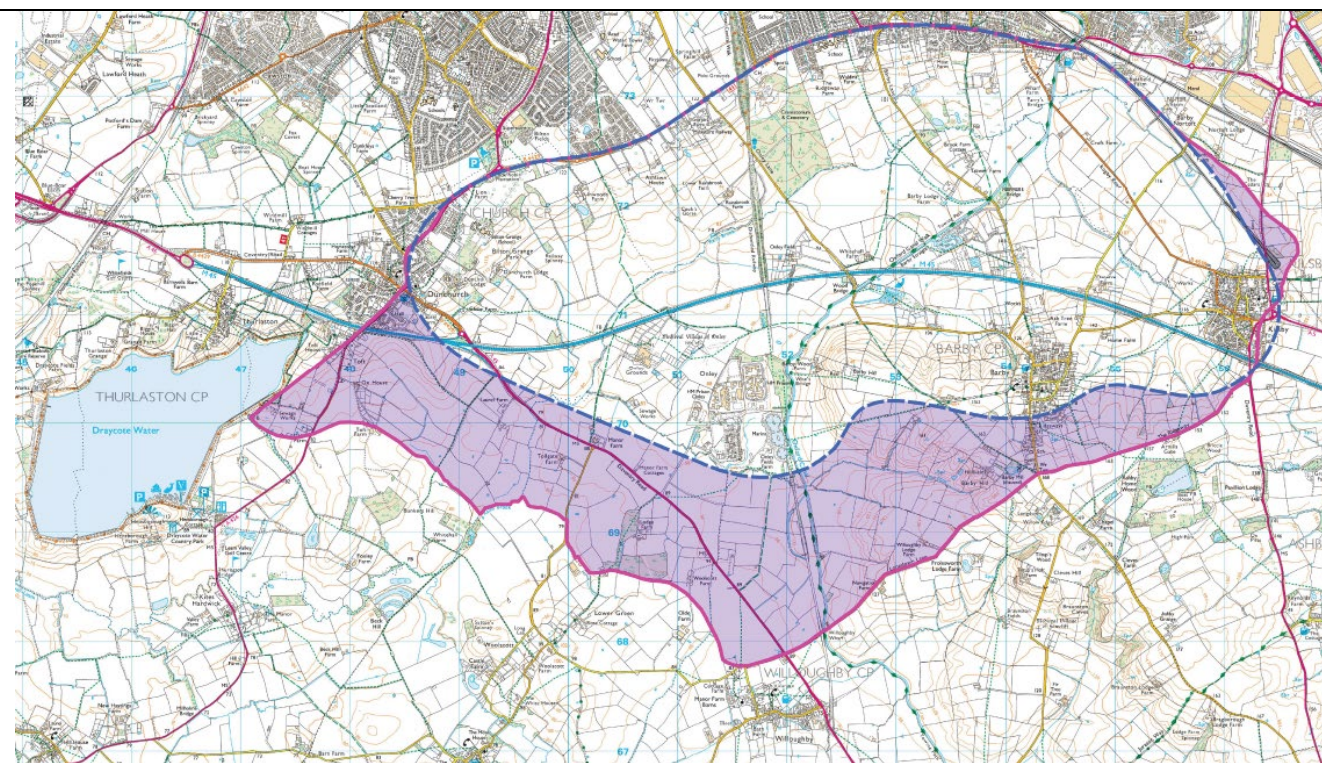


Figure 2-3: Rainsbrook Valley Boundary - Wider Assessment Area

ADDITIONAL AREA FOR ASSESSMENT

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



Legend



Rainsbrook Valley Extents



Rainsbrook Valley Landscape Sensitivity Assessment 2025 - Assessment Area Extents



Additional Area

Figure 2-4: Rainsbrook Valley - Combined Assessment Areas

3 LANDSCAPE CHARACTER CONTEXT

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

RUGBY BOROUGH LANDSCAPE CHARACTER ASSESSMENT, 2025

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

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

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

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

DUNSMORE LANDSCAPE CHARACTER AREA

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

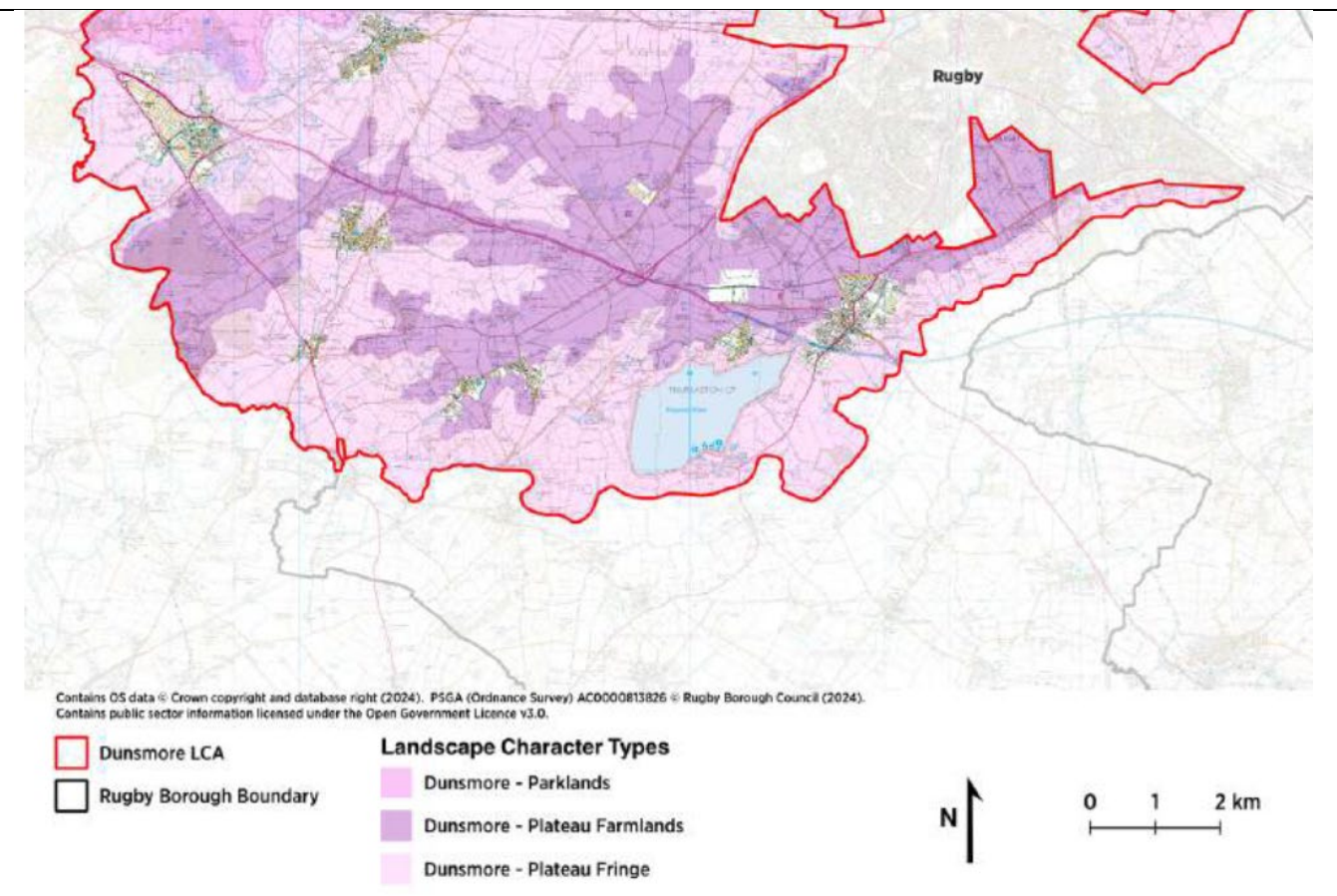


Figure 3-1: Dunsmore LCA and constituent LCTs – Rugby Borough Landscape Character Assessment

DUNSMORE – PLATEAU FRINGE LANDSCAPE CHARACTER TYPE

- 3.12 As set out in the landscape character assessment:

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

3.13 Pressures facing the landscape include:

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

3.14 Landscape Guidelines for the plateau fringe are:

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

FELDON LANDSCAPE CHARACTER AREA

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

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

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

3.17 Key characteristics of the LCA include:

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

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

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

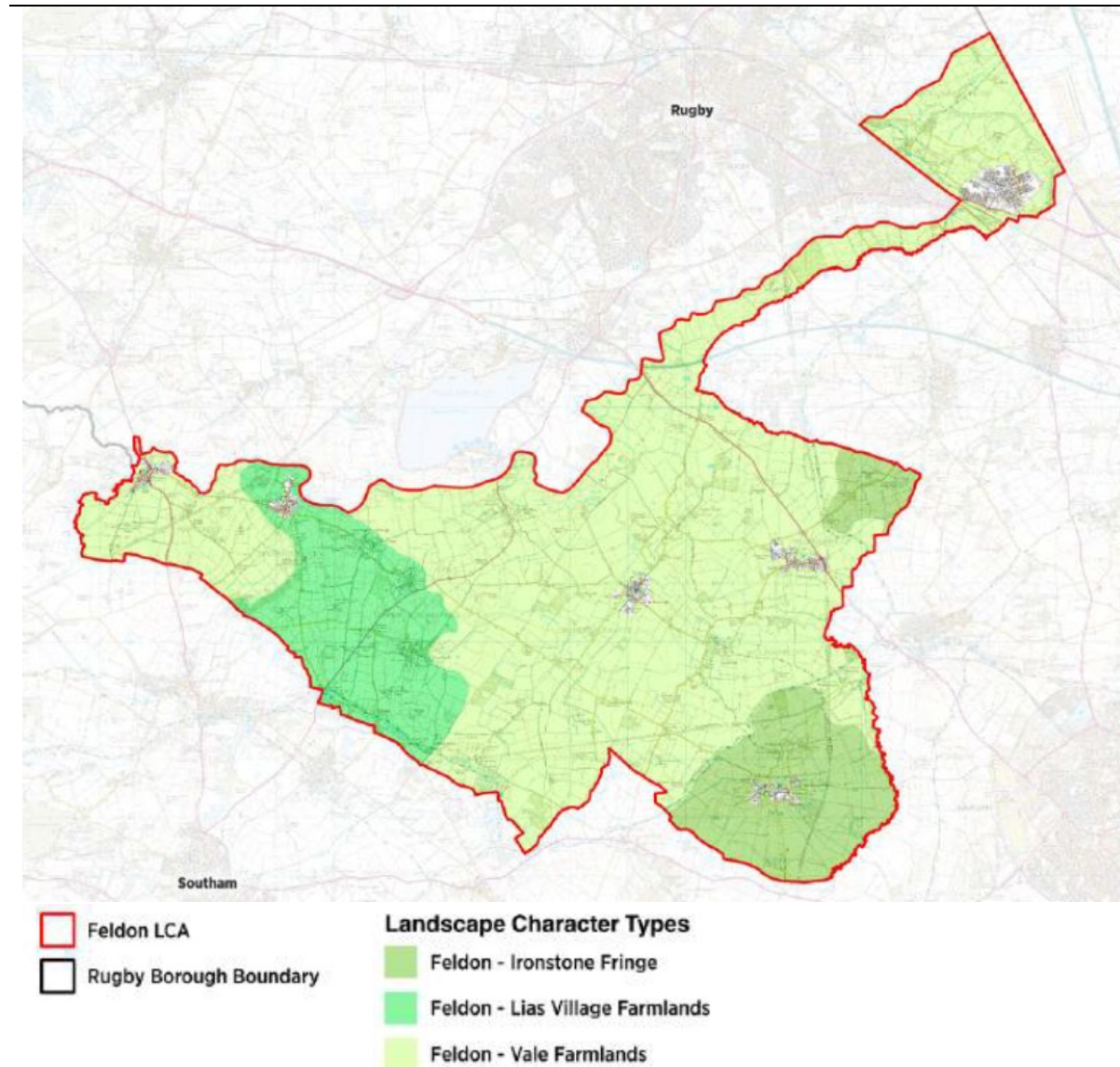


Figure 3-2: Feldon LCA and constituent LCTs, - Rugby Borough Landscape Character Assessment

FELDON - VALE FARMLANDS LANDSCAPE CHARACTER TYPE

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

- Flat, open hedged landscapes with few roads or settlements

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

IRONSTONE FRINGE LANDSCAPE CHARACTER TYPE

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

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

LANDSCAPE GUIDELINES

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

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

DAVENTRY LANDSCAPE CHARACTER ASSESSMENT

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

VALE OF RUGBY LANDSCAPE CHARACTER AREA 19B.

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

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

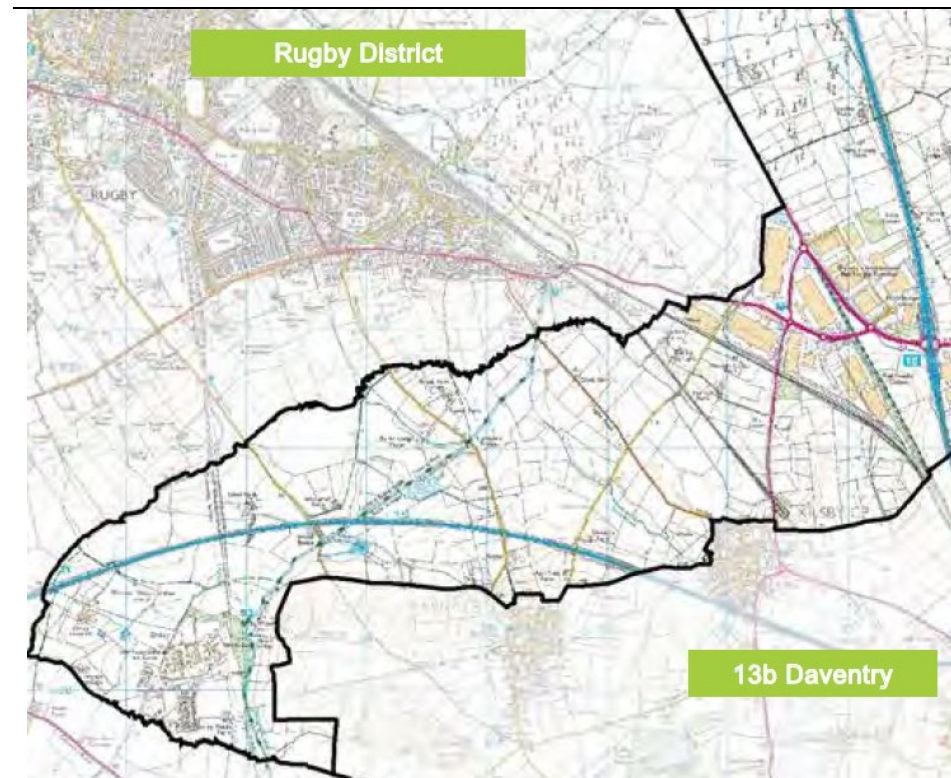


Figure 3-3: Vale of Rugby LCA 19B - Daventry Landscape Character Assessment

Key Characteristics / Description

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

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

Landscape Strategy

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

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

LANDSCAPE CHARACTER – ADDITIONAL AREA

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

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



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

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

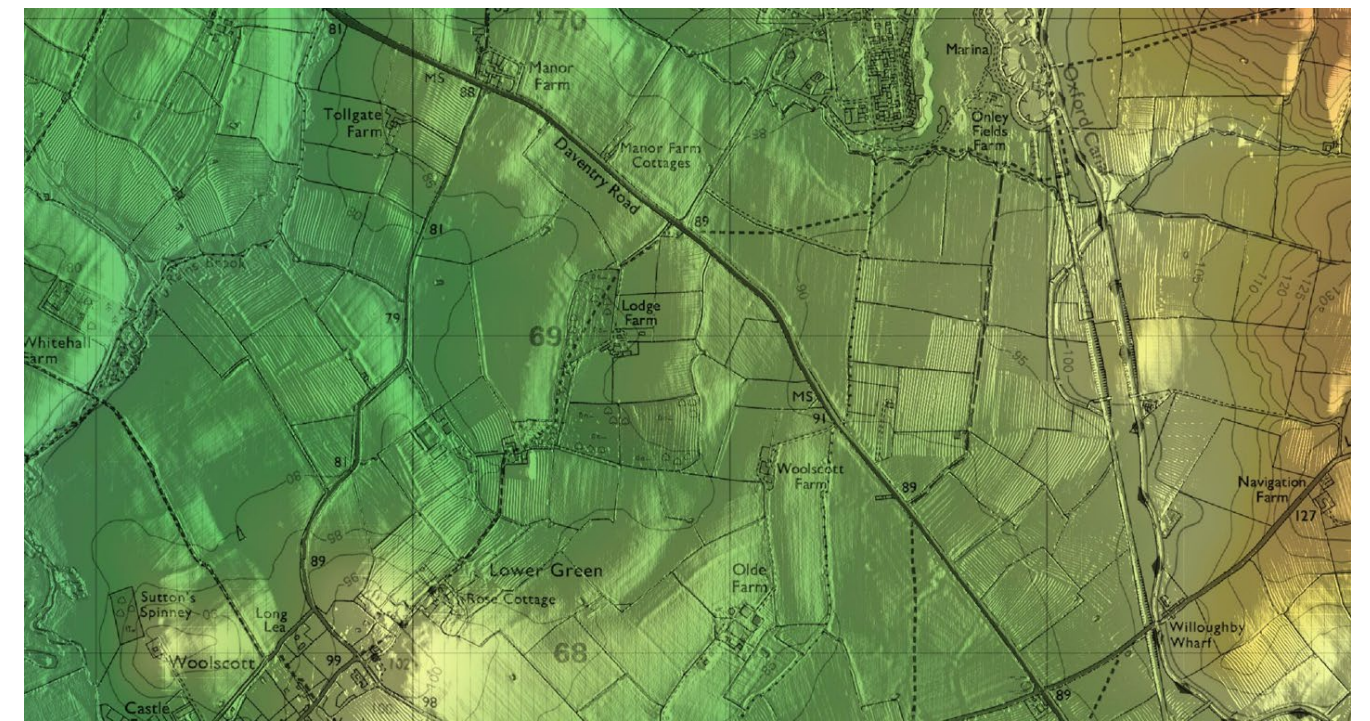


Figure 3-5: Field pattern and ridge and furrow south of Daventry Road and Dunchurch Pools

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



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

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



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

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

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



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

4 LANDSCAPE SENSITIVITY ASSESSMENT – ADDITIONAL AREA

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

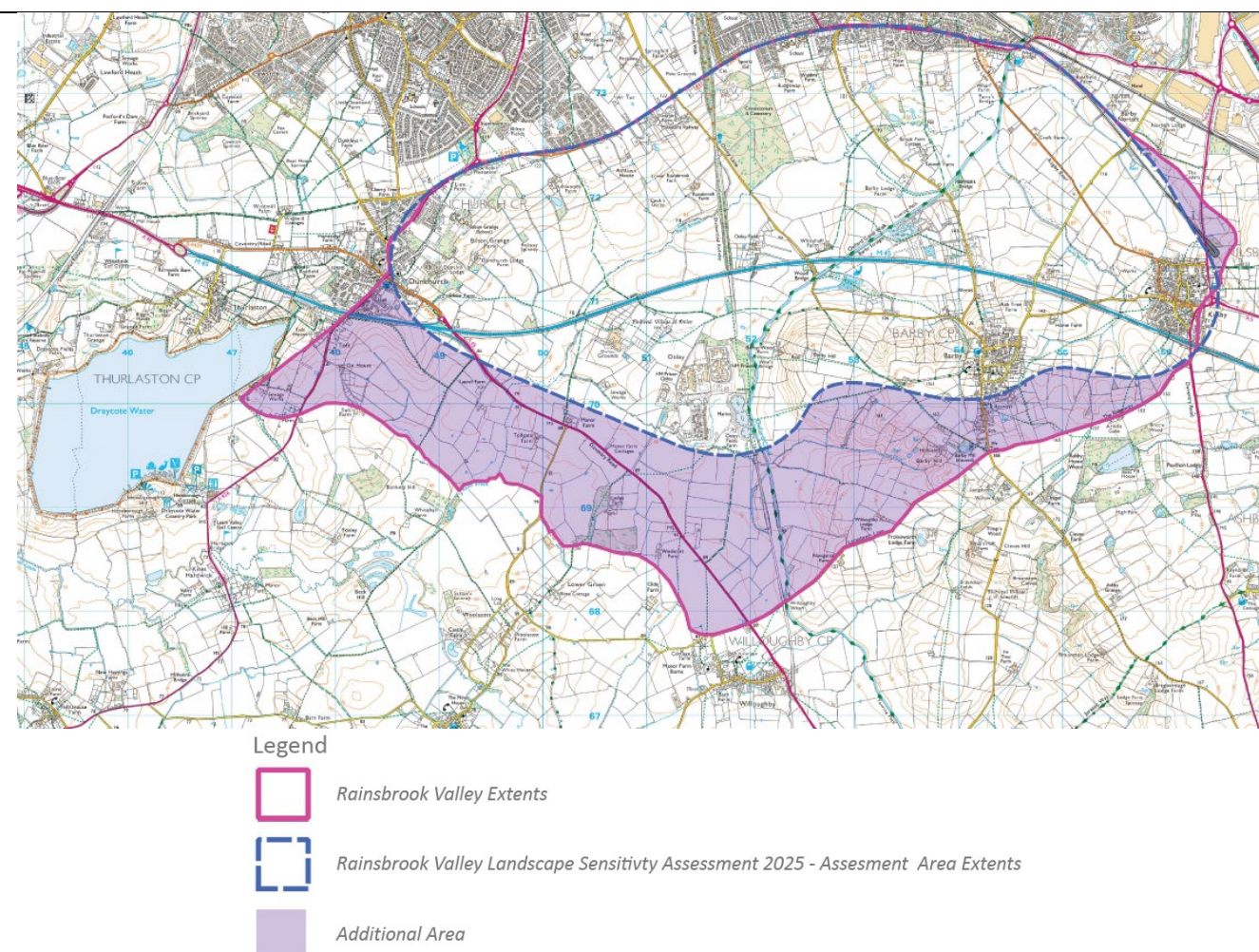


Figure 4-1: Rainsbrook Valley - Combined Assessment Areas

LANDSCAPE SUSCEPTIBILITY

- 4.3 Landscape susceptibility is defined by the Guidelines for Landscape and Visual Impact Assessment¹, as:
- "the ability of the landscape receptor (whether it be the overall landscape quality or condition of a particular landscape type or area or an individual element and or feature or a perceptual aspect) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and or the achievement of landscape policies or strategies"*
- 4.4 In recognition that susceptibility is linked to both the baseline and type of development proposals, when defining the susceptibility of the Rainsbrook Valley, the sensitivity assessment considered this against residential-led schemes of over 50 dwellings to reflect "major development".

RAINSBROOK VALLEY LANDSCAPE SENSITIVITY ASSESSMENT, 2025

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

ADDITIONAL AREA

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

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

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

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

- 4.9 The higher ground at Toft Hill at the southwestern edge of the valley is prominent in views across the valley and when approaching from the south. Development on these slopes would spill over into the valley. As recognised by 2017 Rainsbrook Valley Landscape Sensitivity Study, this area (parcel 14j), has a high sensitivity for housing developments due to the topography and openness, with high levels of intervisibility.
- 4.10 Similarly, Barby Hill to the southeast forms a prominent backdrop and distinctive landform and setting to the valley and is of a high susceptibility.
- 4.11 The wider valley area is remote from the built edge of Rugby and rural in character, comprising an open fieldscape defined by hedgerows and hedgerow trees with development limited to scattered farmsteads and individual dwellings.
- 4.12 Onley Prison and housing at Onley Park is contained at the base of Barby Hill, set amongst blocks of woodland and do not read as part of the open, rural agricultural landscape that crosses the valley.

LANDSCAPE VALUE – COMPARATIVE ASSESSMENT

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

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

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

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

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

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

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

SUMMARY

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

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

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

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

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

Additional Area – Balance of the Rainsbrook Valley

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

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

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

LANDSCAPE SENSITIVITY

RAINSBROOK VALLEY LANDSCAPE SENSITIVITY ASSESSMENT, 2025

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

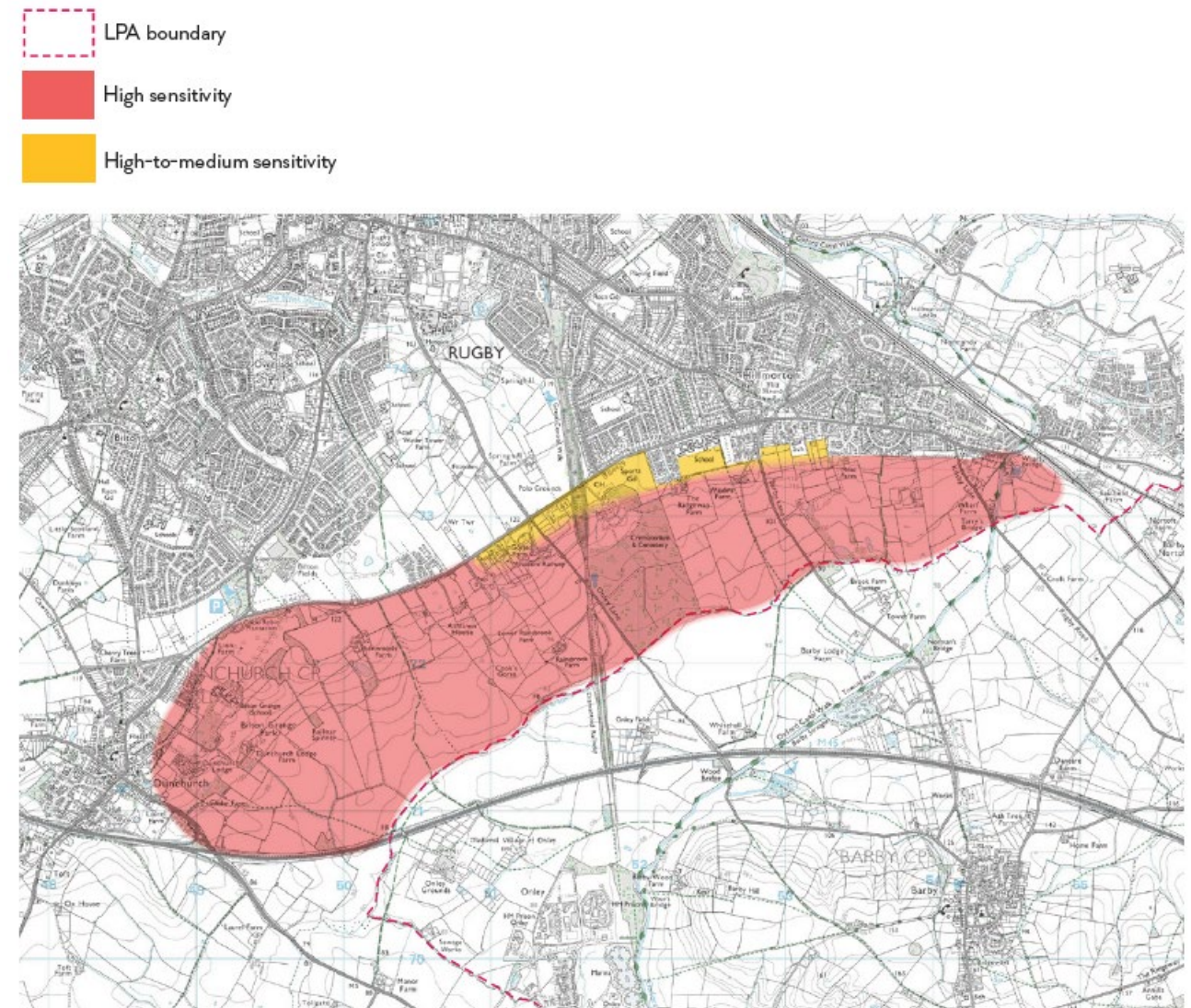


Figure 4-2: Rainsbrook Valley Landscape Sensitivity Assessment, 2025 - Sensitivity Mapping (extract)

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

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

ADDITIONAL AREA – BALANCE OF THE RAINSBROOK VALLEY

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

5 SUMMARY AND CONCLUSIONS

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

FINDINGS OF THE RAINSBROOK VALLEY LANDSCAPE SENSITIVITY ASSESSMENT, 2025

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

ASSESSMENT OF THE BALANCE OF THE RAINSBROOK VALLEY

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

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

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

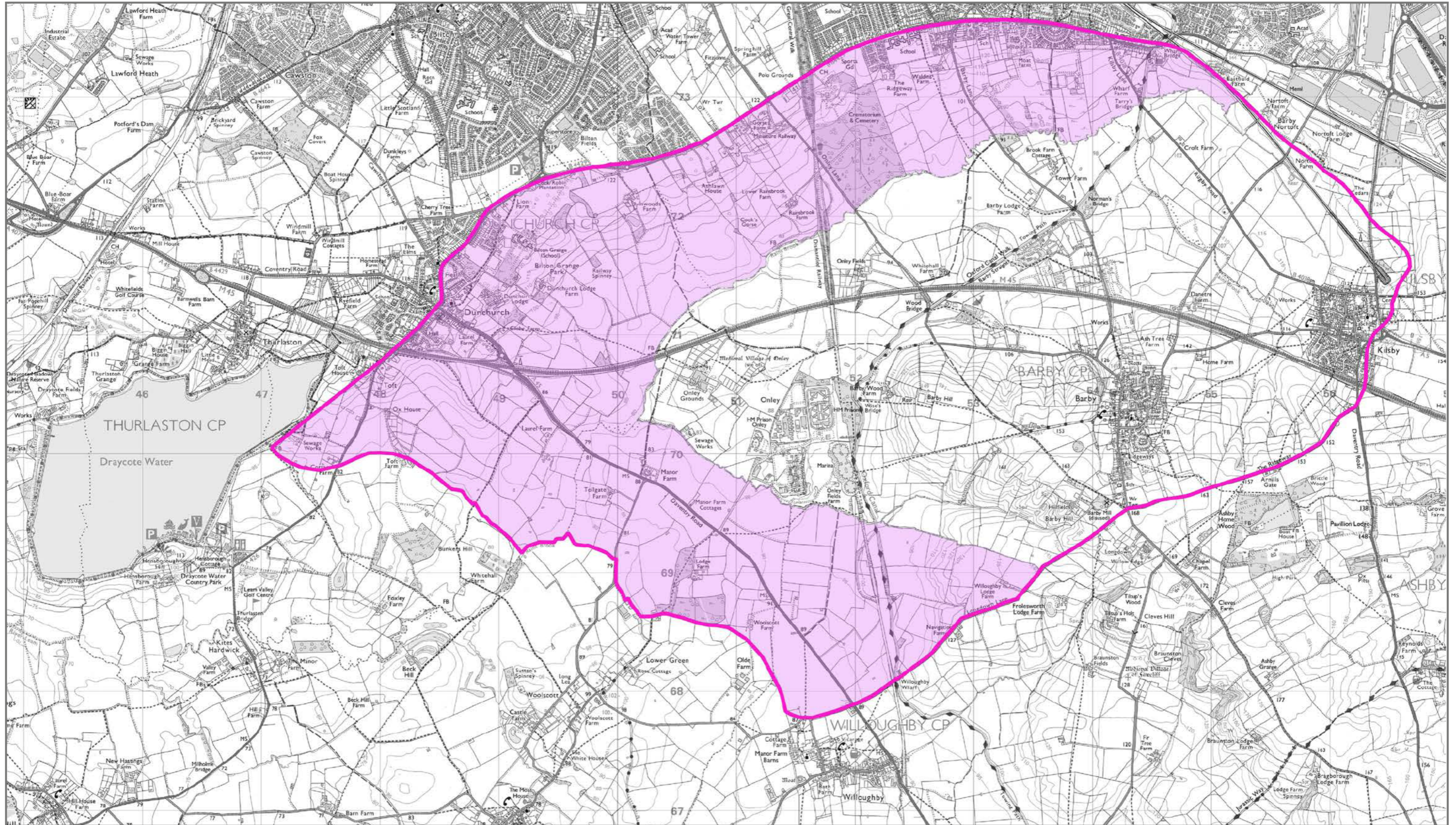
DEFINING THE LOCALLY DESIGNATED LANDSCAPE

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

6 APPENDIX 1: EXTENT OF THE RAINSBROOK VALLEY

THE RAINSBROOK VALLEY WITHIN RUGBY BOROUGH

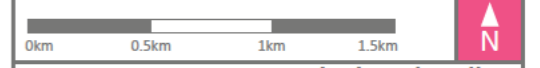
THE RAINSBROOK VALLEY WITHIN WEST NORTHAMPTONSHIRE



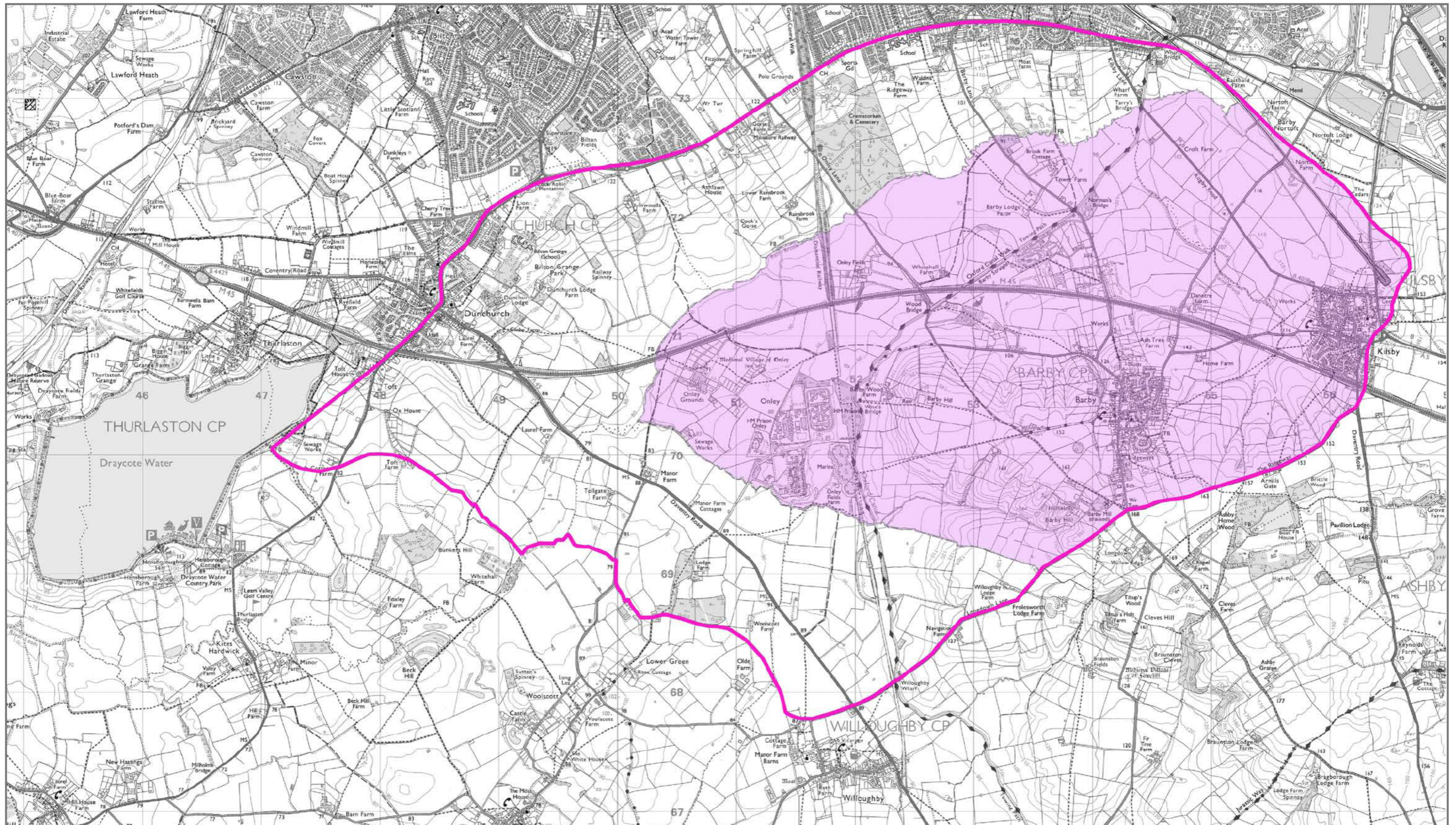
- Legend**
- Rainsbrook Valley
 - Rainsbrook Valley within Rugby Borough

The Rainsbrook Valley within Rugby Borough

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



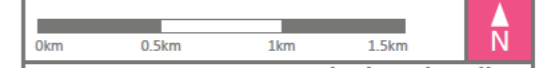
Rainsbrook Valley
 Landscape Sensitivity Assessment Review
 Incola 1144/R01
 06/03/2026



Legend

- Rainsbrook Valley
- Rainsbrook Valley within West Northamptonshire

The Rainsbrook Valley within West Northamptonshire	
Drawing Ref	Incola 1144 Pii
Revision	-
Date	06/03/2026



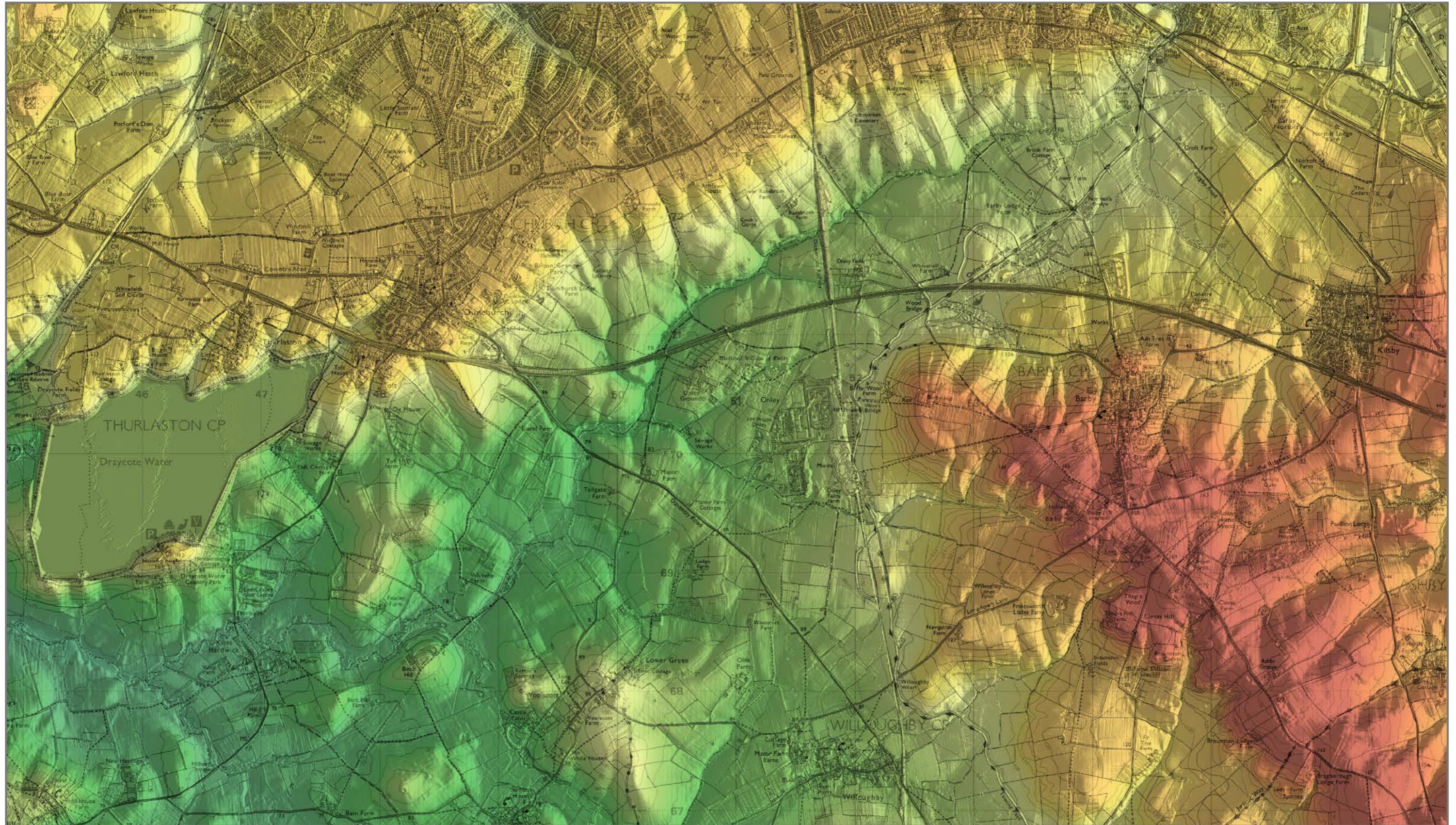
7 PLANS

PLAN 1: TOPOGRAPHY AND LANDFORM

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

PLAN 3: RAINSBROOK VALLEY EXTENTS

PLAN 4: COMBINED ASSESSMENT AREAS



Legend

Scale



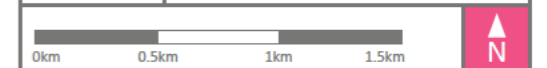
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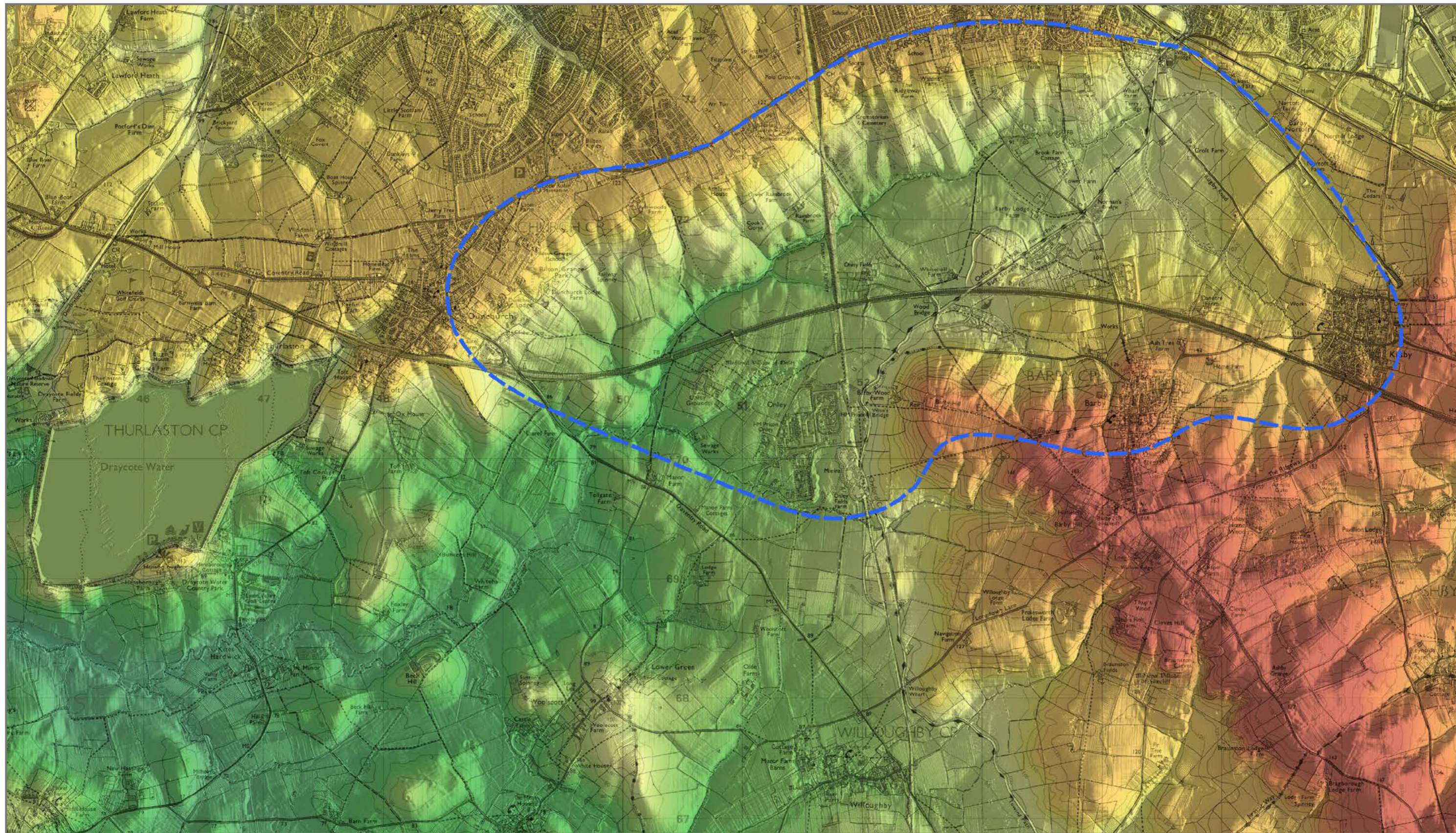
More than 160 m

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

Plan 1: Topography and Landform

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





Legend

Scale



50 m

More than 160 m

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

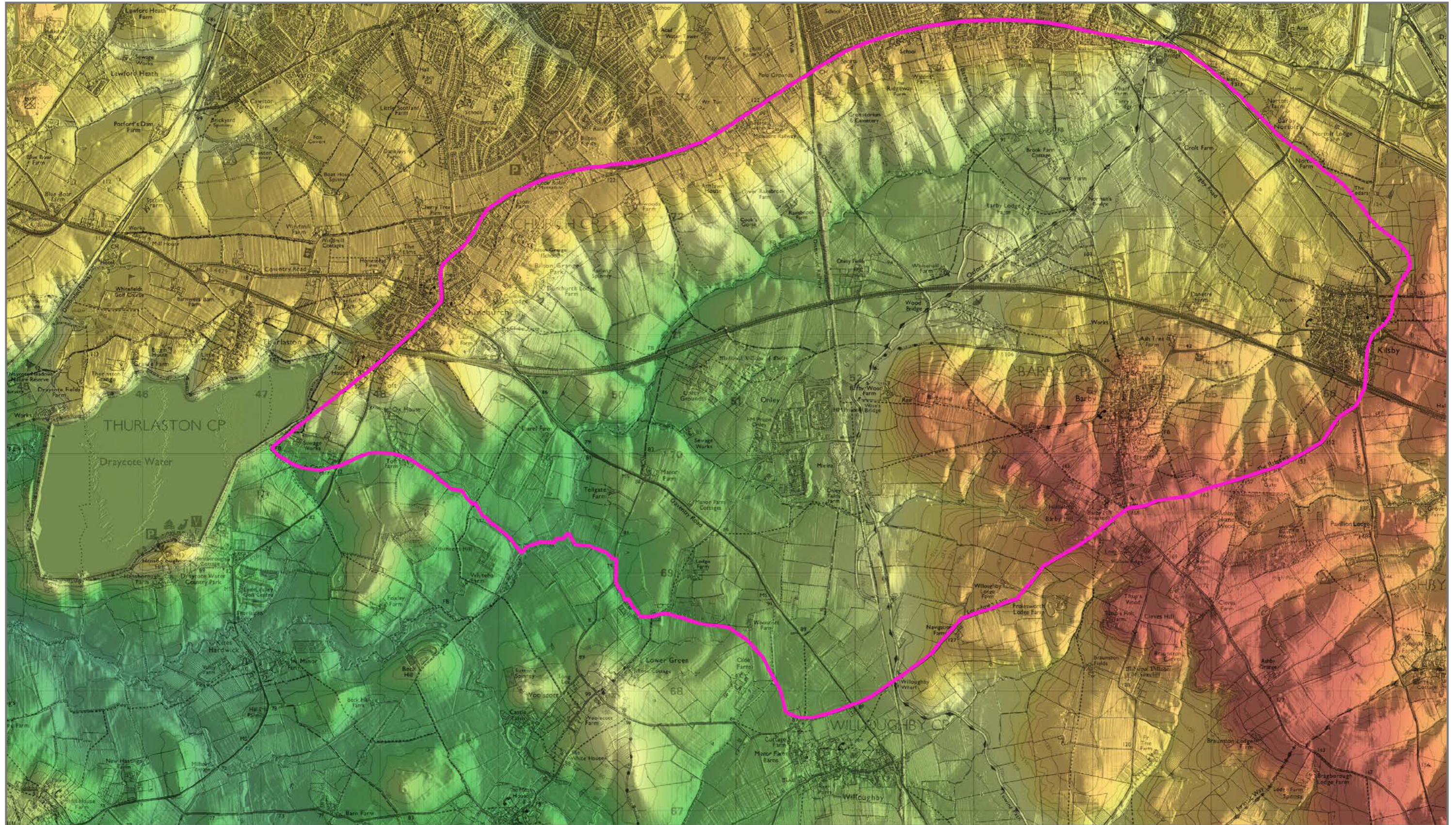


Rainsbrook Valley Landscape Sensitivity Assessment 2025 - Assessment Area Extents

Plan 2: Rainsbrook Valley Landscape Sensitivity Assessment, 2025 – Assessment Area

Drawing Ref	Incola 1144 P2
Revision	-
Date	06/03/2026





Legend

Scale



50 m

More than 160 m

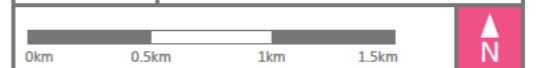
Source: This topography plan has been modelled using GIS computer software (QGIS) and 2020 Composite LIDAR DTM supplied by DEFRA

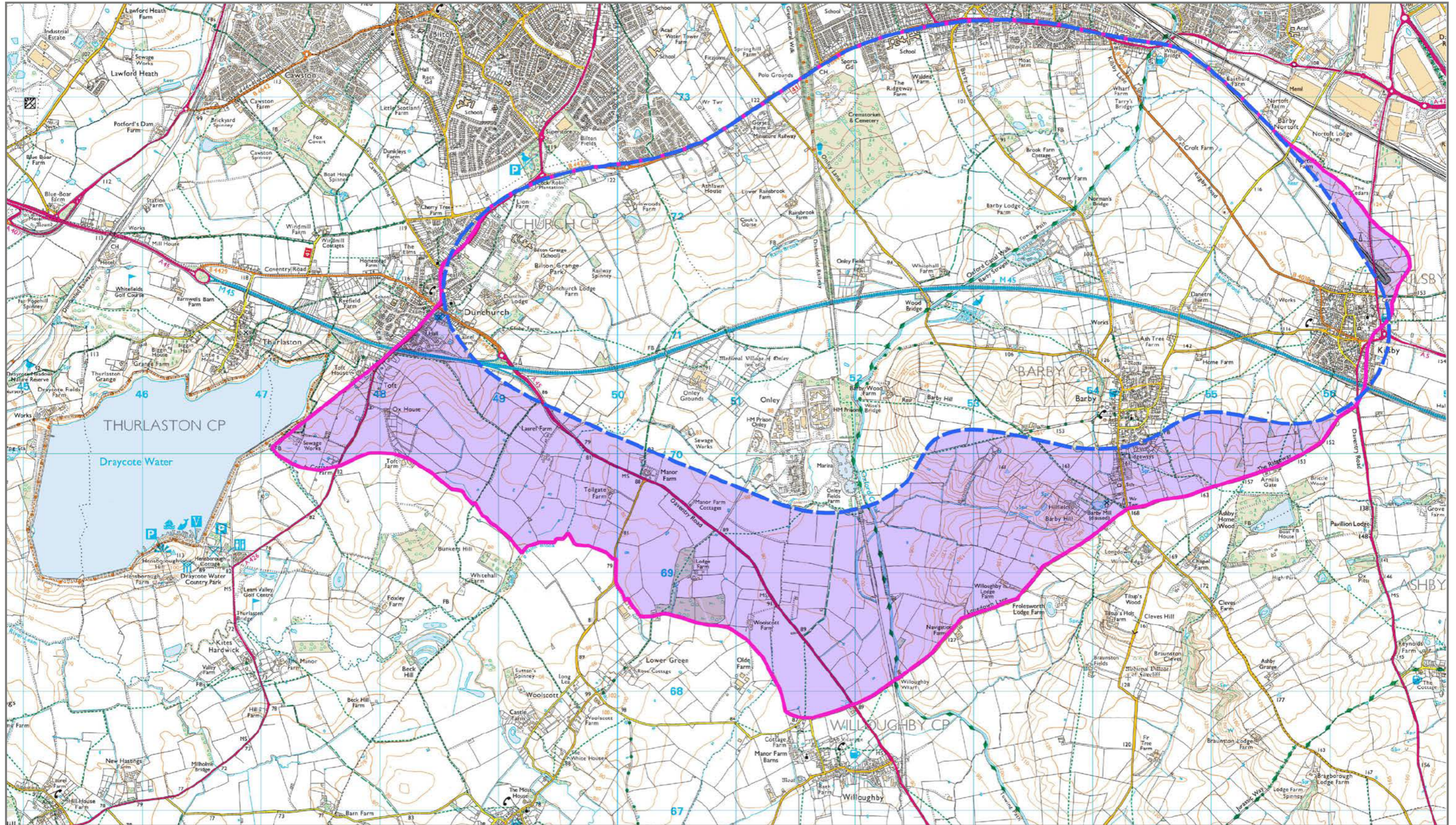


Rainsbrook Valley Extents

Plan 3: Rainsbrook Valley Extents

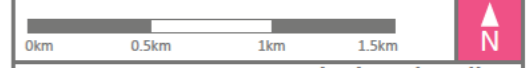
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Revision	-
Date	06/03/2026





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

Plan 4: Combined Assessment Areas	
Drawing Ref	Incola 1144 P4
Revision	-
Date	06/03/2026



Incola Landscape Planning is a trading name of Incola Ltd
Grafton House
Bulls Head Yard
Alcester, Warwickshire, B49 5BX
Company Number: 13021103
VAT Number: 374 2756 74

STAND AGAINST LODGE FARM VILLAGE (SALFV)

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

Representor: Stand Against Lodge Farm Village (SALFV)

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

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

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

1. Introduction

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

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

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

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

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

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

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

2. Summary of SALFV's Position

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

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

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

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

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

2.4 SALFV therefore respectfully invites the Inspector to:

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

3. Regulation 19 Context

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

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

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

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

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

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

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

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

4. Previous Inspector Findings Remain Highly Material

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

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

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

- relatively poor accessibility, particularly by non-car modes;

- significant adverse effects on the landscape;
- harm to heritage assets; and
- that the allocation was unnecessary because the Plan could meet its housing requirements without the site.

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

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

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

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

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

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

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

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

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

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

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

5.3 This conclusion is expressly supported by the Council’s own evidence base. The Sustainability Appraisal records that the strategic growth strategy centred on South

West Rugby is capable, in its own right, of delivering the transport and education infrastructure required to support development in this part of the borough. It follows that “the Lodge Farm allocation is not needed to support the infrastructure requirements of the borough.”

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

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

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

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

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

5.9 The available evidence does not support such a conclusion.

6. Lodge Farm Is Not Convincingly Effective or Deliverable

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

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

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

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

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

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

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

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

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

7. The Infrastructure Burden Is Extraordinary and Undermines Viability

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

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

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

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

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

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

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

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

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

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

8. The Transport Case Remains Fundamentally Weak

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

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

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

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

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

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

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

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

9. Dunchurch Remains a Major Unresolved Pressure Point

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

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

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

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

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

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

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

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

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

10. South West Rugby Already Carries the Strategic Infrastructure Role

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

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

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

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

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

10.6 That cumulative context matters. South West Rugby already represents a significant commitment of land, infrastructure, traffic movement and service provision within the wider south-western area of Rugby. To add Lodge Farm to that same

broad strategic geography would not amount to a balanced or necessary reinforcement of the submitted strategy. It would amount to an intensification of pressure in an area already carrying major strategic obligations.

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

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

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

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

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

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

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

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

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

11.5 The Assessment further concludes that:

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

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

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

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

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

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

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

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

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

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

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

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

13. Even After Mitigation, the Landscape Harm Remains Material

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

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

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

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

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

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

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

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

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

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

14. The Promoter's "Bigger Site" Solution Intensifies the Landscape Harm

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

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

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

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

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

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

14.7 SALFV therefore submits that the promoter's enlarged masterplan does not overcome the landscape objections previously identified. Instead, it intensifies one of the site's principal defects, namely the introduction of large-scale urban form into a landscape that the Council's own evidence base identifies as having high sensitivity to such development.

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

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

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

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

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

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

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

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

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

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

16.2 The Node Landscape Sensitivity Assessment identifies a significant cultural heritage dimension within the valley landscape. This includes the presence and influence of designated heritage assets, Registered Parks and Gardens, Scheduled

Monuments and historic landscape features which collectively contribute to the historic character and setting of the valley.

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

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

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

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

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

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

17. Policy EN3 Should Be Strengthened

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

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

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

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

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

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

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

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

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

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

18. Soundness Conclusions

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

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

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

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

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

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

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

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

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

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

19. Requested Outcome

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

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

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

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

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

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

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

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

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

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

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

20. Participation at Examination in Public

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

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

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

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

21. Conclusion

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

21.2 The evidence base now before the examination indicates that:

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

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

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

Submitted on behalf of:

Stand Against Lodge Farm Village (SALFV)

Representative:

[REDACTED]

Contact email:

[REDACTED]

Contact number:

[REDACTED]

Date:

7 March 2026