

# Sustainability Appraisal (SA) of the Rugby Borough Local Plan

## **SA Report**

December 2025

## Quality information

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# 1. Introduction

## 1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Rugby Borough Local Plan being prepared by Rugby Borough Council.
- 1.1.2 Once adopted, the plan will set a strategy for growth and change up to 2042, allocate sites to deliver the strategy, and establish policies against which planning applications will be determined.
- 1.1.3 SA is a process for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.<sup>1</sup>

## 1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives” with a particular focus on appraising “significant effects”.
- 1.2.3 More specifically, the SA Report must:
  - explain **work to date** and, in particular, appraisal of ‘reasonable alternatives’;
  - present an appraisal of **current proposals**, i.e. the Draft Plan; and
  - explain **next steps**.
- 1.2.4 The report must then be taken into account, alongside consultation responses, when finalising the plan.

## 1.3 This SA Report

- 1.3.1 The current consultation is on the final draft (‘proposed submission’) version of the plan. It is held under Regulation 19 of the Local Planning Regulations and follows a consultation in early 2025 on an early draft version of the plan under Regulation 18.
- 1.3.2 As such, this is the formal SA Report and supersedes the previous report.

### Structure of this report

- 1.3.3 This SA Report is structured in three parts covering “work to date”, “an appraisal of the current proposals”, and “next steps”.
- 1.3.4 Ahead of Part 1, there is a need for two further introductory sections:
  - Section 2 – introduces the plan scope.
  - Section 3 – introduces the SA scope.

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<sup>1</sup> Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2024). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘proposed submission’ plan.

## 2. The plan scope

### 2.1 Introduction

2.1.1 The aim here is to briefly introduce the context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion below); the plan period; and the objectives that are in place to guide plan preparation.

### 2.2 Context to plan preparation

2.2.1 Rugby Borough Council (RBC) began preparing a new Local Plan in **2022**, following adoption of the current Local Plan in 2019 and in the context of a requirement to review local plans every five years. An 'Issues and Options' consultation was held in **2023** followed by consultation on an early draft version of the plan in early **2025**.

2.2.2 Work in 2023 was undertaken in the context of the 2021 NPPF and a draft new NPPF that was then adopted in December 2023. The current Government then adopted a new NPPF in December 2024, and a new draft NPPF is now anticipated in 2025.

2.2.3 Central to both the previous and new versions of the NPPF is a requirement for authorities to take a positive approach to development, with an up-to-date local plan that provides for development needs, including Local Housing Need (LHN), as far as is consistent with sustainable development.

2.2.4 The Borough's **LHN** is understood from the Government's standard method, which previously generated a figure of 525 dwellings per annum (dpa) and now – post December 2024 – generates a figure of 636 dpa. This is a modest increase compared to some other neighbouring areas, although Coventry now sees a reduced LHN.

2.2.5 Under the new NPPF there remains flexibility to evidence a **housing requirement** set below LHN, such that unmet need is generated, but there is a new emphasis on local plans providing for LHN in full, and also on collaborating with neighbouring authorities in respect of any unmet need. Rugby Borough can provide for its LHN in full, including recognising that the rate of delivery has been at or above the current LHN over recent years, and unmet need from elsewhere is a matter for ongoing consideration.

2.2.6 Also, a highly significant consideration for the Local Plan is providing for needs in respect of **employment land**, which are very high after having accounted for an established need for the Borough to make a significant contribution to needs that have been established for the region and sub-region through detailed work over recent years.

2.2.7 It is also important to be clear that there is an urgency in respect of providing for established developments needs through the Local Plan, in that ahead of a new Local Plan that provides for needs there is a risk of not being able to defend against speculative applications and, in turn, poorly located / uncoordinated growth.

2.2.8 To summarise the discussion so far, there is: A) 'top down' pressure to adopt a Local Plan given that the adopted Local Plan dates from 2019 and looks ahead only to 2031, whilst the NPPF expects plans to be reviewed every five years and look ahead 15 years (including in terms of providing for development needs); and B) 'bottom up' pressure in the sense of a need to ensure that growth comes forward in a plan-led way, i.e. such that the Borough can avoid potentially problematic 'planning by appeal'.

2.2.9 Finally, there is a need to adopt a Local Plan that delivers on **wide-ranging objectives** regardless of pressure from central government or concerns about avoiding planning by appeal (under the presumption in favour of sustainable development). For example:

- Providing for housing need is not only of great importance in-and-of itself, but also due to wide-ranging secondary benefits, for example in terms of affordable housing and supporting the local economy.

- Plan-led housing growth creates an opportunity to strategically target infrastructure investment such that the benefits of growth are realised in a way that far exceeds what can otherwise be achieved.
  - A local plan is an opportunity to consider development viability in a strategic way, such that a considered approach can be taken to policy ‘asks’ including housing mix, affordable housing, net zero development, biodiversity net gain, space standards, accessibility standards and more.
- 2.2.10 The Local Plan is also a key opportunity to ensure a strategic approach in respect of a range of other key issues, including providing for Gypsy and Traveller accommodation needs (which are significant), town centre regeneration (including accounting for changes to permitted development rights), and the design of new developments (including factoring in matters relating to space standards, accessibility standards, building energy performance and housing mix). These are all matters that have been a focus of plan-making and SA going back to the Issues and Options stage in 2023.

## 2.3 The plan area

- 2.3.1 The Borough of Rugby is located within the County of Warwickshire, at the eastern edge of the West Midlands, bordering the counties of Northamptonshire and Leicestershire within the East Midlands.
- 2.3.2 Around two thirds of the Borough’s population lives within the town of Rugby, with the other settlements firmly classified as villages (the largest have a population of ~3,000). Coventry is then located adjacent to the west and is a major sub-regional centre in terms of employment, community facilities, retail and leisure; whilst the north of the Borough links closely to the towns of Nuneaton (Warwickshire) and Hinckley (Leicestershire). It should be noted that the intention is for Warwickshire to become a unitary authority (or potentially two unitaries) as part of local government reorganisation.
- 2.3.3 The Borough is very well-connected in transport terms, most notably by road but also by rail. Three motorways intersect the Borough, plus the M1 runs adjacent to the east. There is good motorway connectivity to Coventry to the west (and Birmingham beyond), Leicester to the northeast, and Northampton to the southeast (and Milton Keynes beyond). However, the far south of the Borough is a less well-connected rural area (between Rugby and Daventry), and the central north area is also less well-connected (noting the lack of an M6 junction between Rugby and Coventry).
- 2.3.4 With regards to rail connectivity, Rugby is the only station within the Borough, but from here there are very good services to Coventry / Birmingham, Northampton and Milton Keynes / London. Also, a new Rugby Parkway Station is proposed for the southeast edge of the town (south of Houlton).
- 2.3.5 The adopted Local Plan (2019) directed the great majority of growth to Rugby town – see Figures 2.1 and 2.2 – although there was also modest growth directed to select ‘main rural settlements’. Seven out of the nine main rural settlements are located within the West Midlands Green Belt (all bar Clifton upon Dunsmore and Dunchuch) but there were judged to be “exceptional circumstances” to justify limited Green Belt release.
- 2.3.6 Taking the **committed Rugby strategic urban extensions** in turn:
- Houlton – to the southeast was allocated in the Core Strategy (2011) as ‘Rugby Radio Station’ and this allocation was taken forward into the adopted Local Plan (2019), by which time the site was under construction. Total capacity is ~6,000 homes (~1,300 now occupied) plus there is an employment area and new extensive infrastructure including a secondary school (opened in 2021). However, viability challenges have greatly limited potential to deliver affordable housing.
  - Southwest Rugby – was the primary new allocation proposed by the adopted Local Plan (2019), with the plan supporting ~5,000 homes in total across 12 sites (land ownership parcels), plus major new employment land, road infrastructure (a ‘Spine Road Network’) and wider infrastructure including a secondary school.

A Supplementary Planning Document (SPD) was adopted in 2021 but was then updated in 2024 to reflect latest understanding of infrastructure costs and related delivery challenges. Employment land has now come forward at the southern edge of the site (adjacent to the M45 Junction), but the majority of the site remains unpermitted (although applications are being progressed, as discussed [here](#)).

- Eden Park (Rugby Gateway) – to the northwest was permitted and underway by the time of the Local Plan’s adoption, following a Core Strategy allocation. The extensive employment land element adjacent to the M6 junction delivered early, and the residential elements are coming forward in phases. Alongside 1,300 homes the scheme will deliver a primary school and a community hub.
- Coton Park East – to the northeast was allocated through the adopted Local Plan (2019) for 800 homes, a smaller employment area and a flexible school site (at least a 1fe primary; at most an all through school). Also, the plan explains that the site “... presents the opportunity to extend the existing Coton Park area, providing further housing and employment development. Houses have been built in this area for over 10 years and this final extension... will assist with achieving short term housing supply targets as well as steady delivery in the midterm.” An SPD was then adopted which discussed, amongst other things, new bus and cycle routes, and a small part of the residential has now delivered. However, the land owner is now seeking to bring forward the remainder of the site for employment land.

2.3.7 The next matter for consideration, by way of orientation, is the location of strategic employment sites, which are shown in Figure 2.3. The figure is taken from the Issues and Options consultation document (2023) and additionally shows potential broad areas to explore for new employment land allocations, typically adjacent to existing sites.

2.3.8 Taking the locations highlighted by Figure 2.3 in turn:

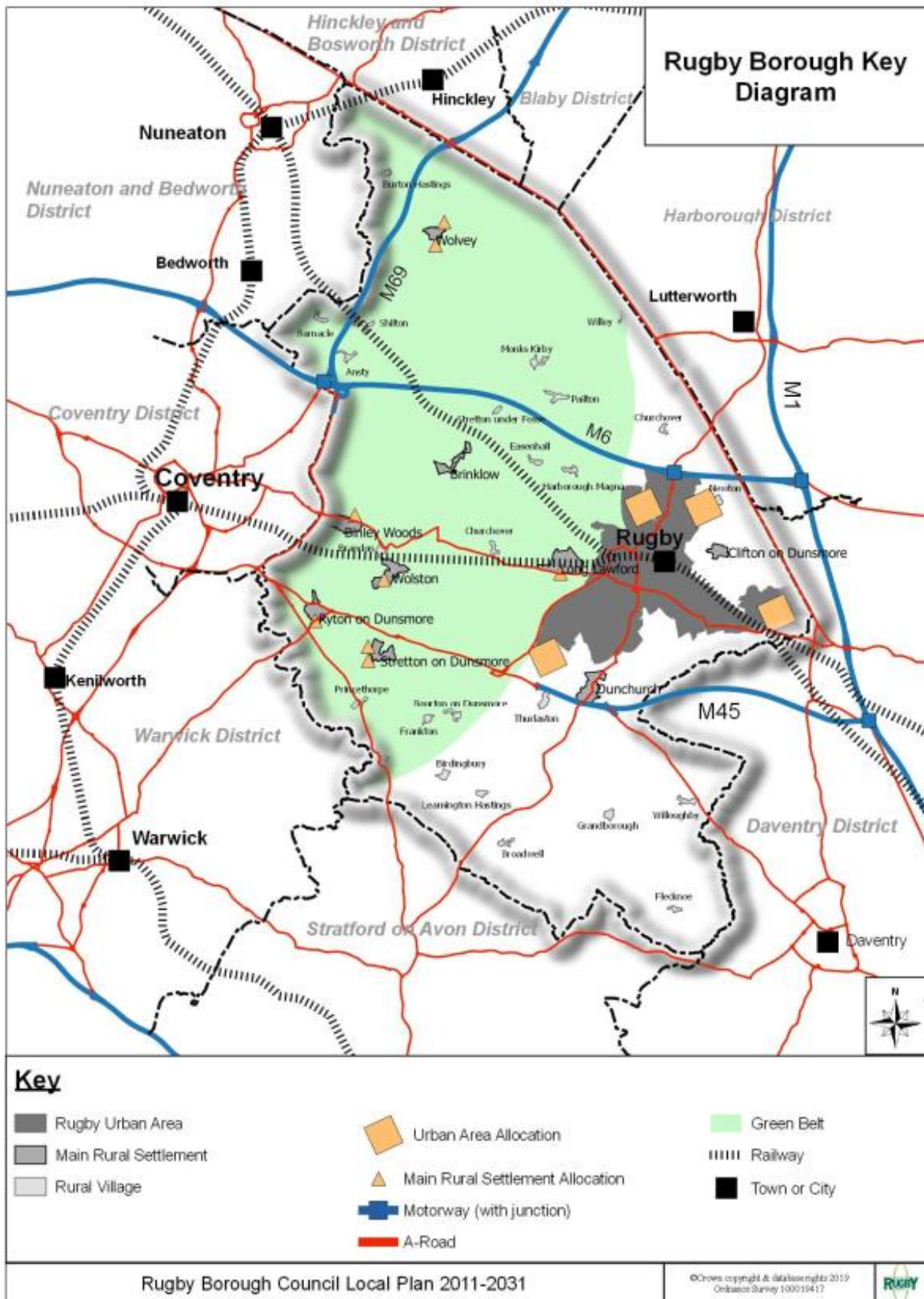
- Southeast Coventry – this is a key cross border strategic employment area shared with both Coventry City Council and Warwick District Council. In particular, it should be noted that the South Warwickshire Local Plan Preferred Options consultation document (2025) identifies a large Major Investment Site, to include a new Gigafactory on the current airport site. Within Rugby Borough, Prologis Park near Ryton-on-Dunsmore is a major employment area (primarily though not solely for ‘logistics’) that has delivered over recent years, and there is a case for expansion as part of a coordinated strategy and subject to wide-ranging factors including constraints relating to transport, Green Belt and the River Avon.
- East Coventry – this area is not currently well-connected in transport terms but there is a pending Development Consent Order (DCO) for a new strategic junction onto the A46. There are also significant constraints (over-and-above Green Belt) relating to Coombe Abbey. The proposal here, known as Walsgrave Hill, would involve a large employment area to the north of Coombe Country Park stretching north to the motorway junction at the NE edge of Coventry. It was discussed as a notable omission site within the Rugby Local Plan Inspector’s Report (2019).
- NE Coventry – this is a key area given the M6 / M69 junction. The sector to the southwest falls within Coventry and is a long-standing employment area, whilst the sector to the northwest falls within Rugby Borough but has not been promoted as available, potentially reflecting more challenging connectivity. To the northeast a major new site was recently [permitted](#) by RBC (Crown Fields Farm); and to the southeast is Ansty Park – a major manufacturing and research and development (R&D) centre that has developed over recent years, and where expansion is an option – as well as the aforementioned Walsgrave Hill site.
- South of Hinckley – employment land at the southern edge of Hinckley (north of the A5) is long-standing, and then a logistics centre was recently delivered to the east of the M69 / A5 junction (in Hinckley and Bosworth Borough). The majority of land in this area is available for development, either for employment or a new settlement, but this is potentially not a sequentially preferable location for growth, and there are constraints/challenges including sensitive Green Belt.

- Magna Park – is a long-standing and very large-scale logistics centre located adjacent to the east of the Borough, within Harborough District. The Park is in the process of expanding to around double its historic extent, with all development within Harborough District. Virtually all land immediately adjacent to Magna Park within Rugby Borough is being promoted for employment development, but the Coventry Green Belt constrains part of this land. Expansion within the Borough was not flagged as a foremost option at the Issues and Options stage (2023).
- North Rugby – northwest Rugby is a long-standing large industrial area, and then land to the north of Rugby, adjacent to M6 J1, has been developed for strategic logistics uses over recent years. As discussed above, whilst Coton Part East is a strategic residential-led allocation in the adopted Local Plan (2019), the landowner is now seeking a new allocation focused on employment land. A new NW Rugby strategic urban extension is also being promoted, which could deliver significant employment land, although this is Green Belt and there are wider challenges.
- East Rugby – Daventry International Freight Terminal (DIRFT) was delivered in the 1990s and then DIRFTII was permitted in 2005, which involved a ~50% expansion, followed by DIRFTIII permitted in 2014 and now nearing completion, whilst DIRFT IV is now proposed. All of DIRFT is within West Northamptonshire, but adjacent to Rugby Borough, and closely linked to the new community at Houlton (discussed above). A major new employment area is also being promoted to the north of Houlton (see Figure 2.3), but this would be separated from Houlton by a flood plain and there is a need to consider the in combination impacts of growth on A5.
- SW Rugby – as discussed above, a major new employment area (Symmetry Park) is now nearing completion as the first phase of the committed SW Rugby strategic urban extension. Also, the adopted Local Plan identified land adjacent to the north of Symmetry Park as a reserve site, such that now supporting its allocation through the new Local Plan is a clear option to explore, including as it would help to fund the new infrastructure needed to realise the SW Rugby vision in full. Furthermore, the majority of land to the south, in the vicinity of the junctions onto the strategic road network, is being promoted for employment land.

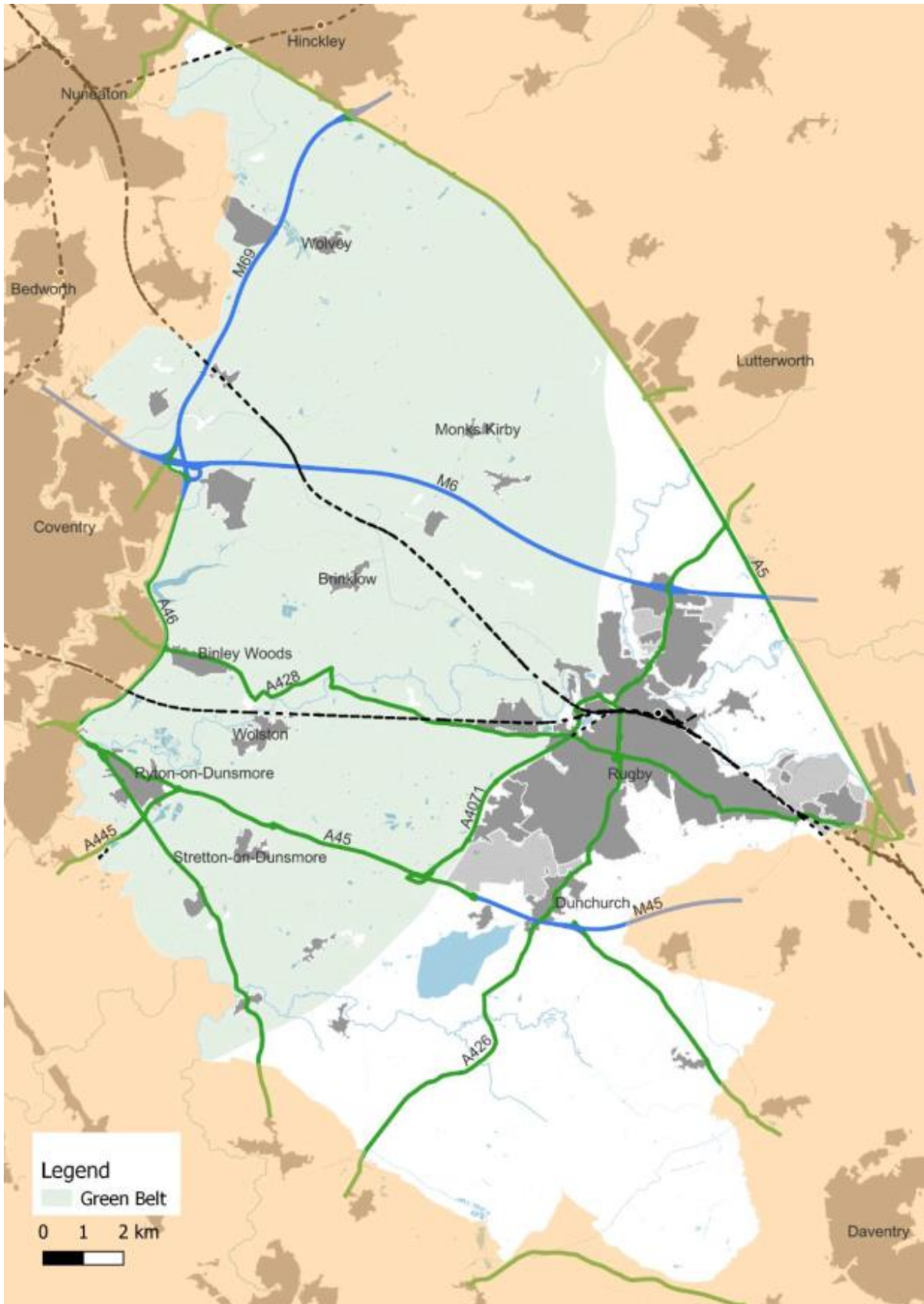
2.3.9 This discussion has sought to introduce the plan area with reference to existing, recent and committed development sites and strategic employment areas (where expansion is almost invariably an option). However, there are, of course, numerous wider strategic spatial issues and opportunities that are important for orientation. These are a focus of discussion in subsequent sections of this report, but key points to note here are:

- Rugby town centre – must be a focus of the new Local Plan, as was recognised at the Issues and Options stage, including recognising changes to the context surrounding planning for town centres. A Rugby Regeneration Strategy was published in 2022, and delivering new homes is one priority.
- Landscape and green / blue infrastructure (GBI) – detailed work has also been completed to understand varying landscape character and sensitivity, as discussed further below. Also, the adopted Local Plan includes a GBI policy map that highlights priority areas including an extensive area to the east / south east of Coventry and numerous river corridors (with a concentration at Rugby town).
- Green Belt – a two stage Green Belt Assessment (GBA) has recently been completed with a particular focus on identifying ‘grey belt’. The Stage 1 assessment identifies large swathes of the rural area as provisional grey belt, whilst land adjacent or in proximity to a main settlement requires detailed consideration before identifying any provisional grey belt, which is the focus of Stage 2.
- Strategic Transport Assessment – this is another recent evidence study. It models various growth scenarios, accounting for modal shift and mitigation assumptions, and so is inevitably complex, but here the following identified “sensitive locations” can be noted: 1) A5/A426/Gibbet Hill Roundabout; 2) A426/A4071 Avon Mill/Hunters Lane (an improvement scheme is proposed); 3) A426/Boughton Road Roundabout; 4) Rugby Gyrotory; and 5) A45/A46 Toll Bar End junction.

Figure 2.1: The adopted Local Plan Key Diagram



**Figure 2.2:** A figure from the I+Os document showing committed strategic urban extensions



**Figure 2.3:** Existing employment areas and employment growth options (from the I+Os stage)



## 2.4 The plan period

2.4.1 The plan period is 2025 to 2042, in light of NPPF paragraph 22 which states:

*“Local plans] should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead...”*

2.4.2 With regards to the start of the plan period ('base date'), whilst there can be an argument for setting a base date at the start of the plan-making process and then applying this as a 'firm footing' for all subsequent work, it is increasingly seen as good practice to set a base date as close as possible to the point of plan finalisation. For example, an Inspector's Letter relating to the North Norfolk Local Plan Examination (dated 24 May 2024) stated: *“Turning to the base date of the plan, this should correspond to the date from which the housing needs of the district are quantified. As set out in paragraph 12 below, this should be April 2024.”* In some instances it can be argued that an earlier base date is necessary to account for poor housing delivery in the years prior to adoption of a new local plan, but this is not a relevant consideration for Rugby Borough. Also, and in any case, the Government's standard method for calculating housing need accounts for past delivery through an affordability uplift.

2.4.3 With regards to the plan end date, whilst at the Regulation 18 Draft Plan proposed to plan to 2045 as a proactive approach particularly mindful that the West Midlands Strategic Employment Sites Study (WMSESS; 2024) provides evidence for future development needs to 2045 and 2050, the proposal now is to plan to 2042. This is in line with NPPF paragraph 22 (see above) in that there is limited case for identifying “larger scale developments such as new settlements or significant extensions...” through the new local plan. However, it is acknowledged that there do remain options for 'strategic growth locations' of this nature that warrant consideration for potential inclusion in the plan. This is a matter that is a focus of discussion below.<sup>2</sup>

2.4.4 Finally, an important point to note here is that, as of the start of the plan period (1<sup>st</sup> April 2025) there was known to be 8,843 homes supply from 'commitments', which comprises sites with planning permission or an existing allocation that can likely be rolled forward into the new Local Plan (albeit there is always a need for proportionate work to confirm that this is the case, as there is feasibly the potential to remove support for an allocation). Within this figure, around 6,500 homes are committed across two strategic urban extensions to Rugby, namely South West Rugby and Houlton (and focusing only on supply to 2042, recognising that both sites are set to still be delivering post 2042). There is also a very significant amount of committed employment land.

2.4.5 As such, a key aim for the local plan is to identify housing and employment land supply over-and-above commitments (also a windfall assumption for housing)<sup>3</sup> sufficient to deliver on the identified needs / requirements (where the distinction is a matter that has been introduced above and is discussed below). A further important consideration is then identifying supply to meet Gypsy and Traveller accommodation needs.

<sup>2</sup> A further argument for a shorter plan period relates to impending local government review (LGR), in that decisions about longer-term growth in Rugby Borough might be better taken by a successor unitary authority post LGR, informed by the new spatial development strategies introduced under the Planning and Infrastructure Bill 2025.

<sup>3</sup> The windfall assumption is the assumed level of supply from sites not allocated in the Local Plan, which in Rugby Borough means sites of fewer than 5 homes, typically in urban areas.

## 2.5 Plan objectives

2.5.1 It is important to set objectives to guide the plan-making process. Also, plan objectives are a key input to the SA process, because 'reasonable alternatives' must be defined taking account of "the objectives... of the plan." The plan objectives are as follows:

- Support the diversification and growth in sustainable locations of Rugby Borough's economy in line with the Economic Strategy
- Support the revival of Rugby town centre
- Reduce emissions and adapt to climate change
- Raise design standards
- Deliver infrastructure-led growth
- Facilitate a greener, more biodiverse borough

## 3. The SA scope

### 3.1 Introduction

3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) nor the scope of reasonable alternatives (discussed in Part 1).

3.1.2 The aim here is to introduce the reader to the broad scope of the SA. Further information is presented in a Scoping Report that was published for consultation in 2023; however, it is important for the SA scope to remain flexible, responding to the emerging plan / reasonable alternatives and latest evidence. The SA scope – i.e. understanding of key sustainability issues and objectives, in light of contextual factors and baseline trends – is discussed within the appraisal sections below as appropriate.

#### Consultation on the scope

3.1.3 The regulatory requirement is that: "*When deciding on the scope and level of detail of the information that must be included in the [SA Report], the responsible authority shall consult the consultation bodies.*" As such, the consultation bodies – the Environment Agency, Historic England and Natural England – were consulted on the SA scope in 2023 (at the time of the Issues and Options consultation). All three consultation bodies provided comments, which are referenced within the appraisal sections below.

#### The SA framework

3.1.4 The outcome of scoping work in 2023 was an SA 'framework' comprising 24 objectives grouped under 18 topics. The aim of an SA framework is to ensure suitably focused and concise appraisal, and, in this light, in early 2025 (ahead of the Draft Local Plan consultation) it was considered appropriate to make some adjustments to the framework.<sup>4</sup> The SA framework is unchanged at the current time – see Table 3.1.

<sup>4</sup> Specifically, whilst no objectives were deleted, several were edited, and it was considered appropriate to group the objectives under 13 topic headings, with a view to ensuring an appraisal that is suitably structured, in terms of balancing a need to be both: A) systematic; and B) concise and accessible, with minimal repetition of points or discussion of 'non-issues'. Table 3.1 within the Interim SA Report published alongside the Draft Local Plan in early 2025 explained the changes that had been made to the framework, but there is no need to represent that information at the current time.

**Table 3.1: The SA framework**

<b>Topic</b>	<b>Objective</b>
Accessibility (to community infrastructure)	<ul style="list-style-type: none"> <li>• Ensure good access to schools and other services / facilities</li> <li>• Improve the quality and accessibility of leisure opportunities</li> <li>• Protect and enhance the quality of public areas and green spaces</li> </ul>
Air quality	<ul style="list-style-type: none"> <li>• Reduce air pollution and ensure air quality continues to improve</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>• Conserve and enhance biodiversity</li> </ul>
Climate change mitigation	<ul style="list-style-type: none"> <li>• Address climate change by reducing greenhouse gas emissions</li> <li>• Increase energy efficiency and the proportion of energy generated from renewable sources</li> </ul>
Climate change adaptation	<ul style="list-style-type: none"> <li>• Reduce the risk of flooding and the resulting detriment to public well-being, the economy, and the environment</li> <li>• Address wider climate change impacts including overheating</li> </ul>
Communities, health and well-being	<ul style="list-style-type: none"> <li>• Improve health and wellbeing</li> <li>• Reduce poverty and social exclusion</li> <li>• Provide opportunities for interaction</li> <li>• Reduce crime and disorder</li> <li>• Ensure the vitality and viability of Rugby town centre</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>• Increase investment in Rugby's economy including to facilitate sustainable regeneration</li> <li>• Ensure high and stable levels of employment so all can benefit from economic growth</li> <li>• Provide opportunities for residents to work locally in line with 'sustainable transport' objectives</li> <li>• Ensure the vitality and viability of Rugby town centre</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>• Protect and enhance the historic environment</li> </ul>
Homes	<ul style="list-style-type: none"> <li>• Ensure that everyone has the opportunity to live in a decent and affordable home</li> </ul>
Landscape and townscape	<ul style="list-style-type: none"> <li>• Protect and enhance the countryside, particularly valued landscapes</li> <li>• Ensure a high quality townscape incorporating good design principles for buildings and surrounding spaces</li> </ul>
Resources	<ul style="list-style-type: none"> <li>• Protect productive agricultural land</li> <li>• Improve efficiency in land use through the re-use of previously developed land and existing buildings</li> <li>• Support sustainable resource consumption and waste management</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Reduce the need to travel and reduce the effects of traffic on communities</li> <li>• Facilitate modal shift away from use of the private car to other forms of travel including walking, cycling and public transport</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Maintain and improve water resources and water quality, including accounting for wastewater treatment</li> </ul>

# Part 1: Work to date

## 4. Introducing Part 1

### 4.1 Overview

4.1.1 As discussed, work has been under way since 2022. However, the aim here is not to relay the entire backstory, nor to provide an ‘audit trail’ of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2025 ahead of the current Regulation 19 publication stage. Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with – see **Section 5**
- present an appraisal of the reasonable alternatives – see **Section 6**
- explain the Council’s reasons for selecting the preferred option – see **Section 7**

4.1.2 Presenting this information aligns with the requirement to report an appraisal of reasonable alternatives and “an outline of the reasons for selecting the alternatives...”

### 4.2 Reasonable alternatives in relation to what?

4.2.1 The requirement is to examine reasonable alternatives (RAs) taking account of “the objectives and geographical scope of the plan”, which suggests a need to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites**, to provide for objectively assessed needs alongside delivering-on wider plan objectives. Establishing a spatial strategy is invariably a central objective of any local plan.<sup>5</sup>

4.2.2 Given the objectives of any local plan, spatial strategy alternatives can perhaps more accurately be described as **alternative key diagrams**, where the key diagram is a reflection of established development requirements, spatial strategy and site selection. Alternative key diagrams can then be termed ‘**growth scenarios**’ as a shorthand.

4.2.3 In short, a focus on reasonable alternatives (RAs) in the form of ‘growth scenarios’ ensures a focus on mutually exclusive alternatives that go to the heart of the local plan.<sup>6</sup>

4.2.4 Housing and employment land are key matters to explore across growth scenarios, and providing for Gypsy and Traveller accommodation needs is a further consideration.

#### What about site options?

4.2.5 Whilst individual site options clearly generate interest, they are not RAs in the context of most local plans. Were the objective to allocate one site, then site options would be RAs, but that is rarely the case for local plans. Rather, the objective is to allocate a package of sites and so RAs must be in the form of alternative packages of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of defining RA growth scenarios (Sections 5.3 & 5.4).

#### What about other aspects of the plan?

4.2.6 As well as establishing a spatial strategy, allocating sites etc, the plan also seeks to establish thematic policies as well as site-specific policies. These can be broadly described as development management (DM) policies. However, it is a challenge to define “reasonable” DM policy alternatives, and, in this case, none are identified following discussion with Officers. DM policies are discussed further in Part 2.

<sup>5</sup> Another consideration is that to be ‘reasonable’ alternatives must be meaningfully different to the extent that they vary in terms of **significant effects**, where significance is defined in the context of the plan (taken as a whole). A focus on key diagram RAs (‘growth scenarios’) guarantees that this will be the case and so negates the need for a process of screening what should and should not then be a focus of subsequent work to explore (i.e. define, appraise and consult upon) RAs. It is also important to note that appraising a draft proposal versus the ‘do nothing’ option does not equate to an appraisal of RAs, because do nothing is the baseline and there is a separate requirement, as part of the SA process, to appraise the draft plan against the baseline.

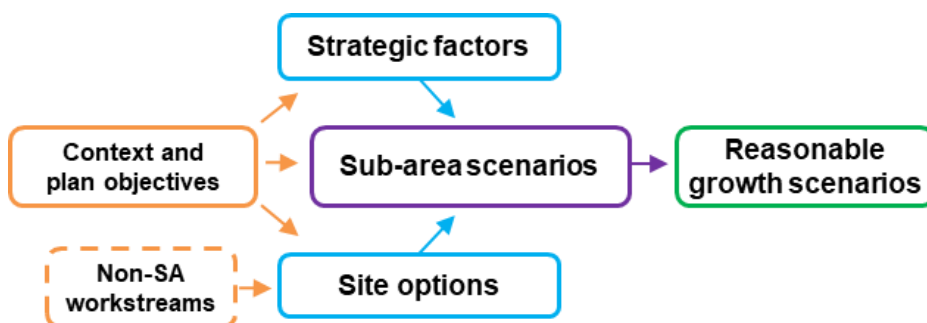
<sup>6</sup> This is important in light of the regulatory requirement, when read at face value, suggests a need to appraise and consult upon alternative plans; specifically, the requirement is to appraise and consult upon: “... the plan and reasonable alternatives”.

## 5. Defining growth scenarios

### 5.1 Introduction

5.1.1 The aim here is to discuss the process that led to the definition of reasonable alternatives (RAs) in the form of growth scenarios in 2025.

*Figure 5.1: A standard broad process to define RA growth scenarios*



5.1.2 This process is described across the following sub-sections:

- Section 5.2 – considers strategic factors ('top down').
- Section 5.3 – considers individual site options ('bottom up').
- Section 5.4 – draws upon the preceding two sections to consider growth options/scenarios for individual sub-areas within the Borough in turn.
- Section 5.5 – combines sub-area scenarios to form RA growth scenarios.

### A note on limitations

5.1.3 This section does not present an appraisal of reasonable alternatives but rather describes the process that led to the definition of reasonable alternatives. The work reported here is a means to an end (reasonable alternatives) which, in turn, has a bearing on the extent of work that is proportionate, also recalling the legal requirement, which is to present an “**outline** of the reasons for selecting alternatives...” [emphasis]

## 5.2 Strategic factors

### Introduction

5.2.1 The aim of this section is to explore strategic factors (issues and options) with a bearing on the definition of RA growth scenarios. Specifically, this section of the report explores:

- Quantum – how much development is needed (regardless of capacity)?
- Broad spatial strategy – broadly where is more/less suited to growth; also, what growth typologies are supported, e.g. large ('strategic') sites versus smaller sites?

### Quantum

5.2.2 This section sets out understanding of development needs in respect of housing, employment land and Gypsy and Traveller accommodation in turn. In each case, in addition to setting out understanding of objectively assessed need (NPPF para 11), the aim is to also explore high level arguments for the Local Plan providing for a quantum of growth either above or below objectively assessed need.

## Housing

- 5.2.3 A central tenet of local plan-making is the need to **A)** objectively establish housing needs ('policy-off'); and then **B)** develop a response to those needs through the local plan ('policy-on'). **Guidance** explains: "*Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement...*"
- 5.2.4 With regard to (A), the NPPF states that local housing need (LHN) should be established via an assessment "conducted using the standard method". With regard to (B), most local authorities respond to LHN by setting a housing requirement that equates precisely to LHN; however, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.
- 5.2.5 For Rugby Borough the Government's standard methodology establishes an **LHN** figure of 636 dwellings per annum (dpa), or 10,812 homes in total over the plan period.
- 5.2.6 There is little question of setting the housing requirement at a figure **below LHN** (i.e. not providing for LHN in full, leading to unmet need), given the relatively limited nature of constraints affecting the Borough, including accounting for the new designation of grey belt that is discussed further below. Also, it is important to note that the Borough has been delivering housing at a rate at or above LHN over recent years.
- 5.2.7 With regard to a housing requirement set **above LHN**, NPPF para 67 explains: "*The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.*"
- 5.2.8 With regard to unmet need, this is an ongoing consideration, recognising that the adopted Local Plan (2019) makes provision for unmet need from Coventry.<sup>7</sup> However, the emerging Coventry Local Plan is expected to make provision for LHN in full,<sup>8</sup> and there is little risk of unmet need from elsewhere.<sup>9</sup>
- 5.2.9 With regard to the possibility of a housing requirement set above LHN on the basis of "growth ambitions...", this is not considered to be a significant consideration. Whilst the delivering a high employment growth strategy is a clear option for the Local Plan, support for any such option would not necessarily suggest a need for commensurately high housing growth, because the aim of the high employment growth strategy would be in part to provide for needs arising *sub-regionally*. Specifically, the 'Homes – Jobs Alignment Paper' (2025) produced on behalf of Coventry and Warwickshire local authorities demonstrates that: A) the key geography for considering the balance of new housing and new employment land is Coventry and Warwickshire; and that B) assuming employment land needs are met within this sub-region then there will be comfortably sufficient housing growth to provide for the necessary workforce. The Paper concludes:

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<sup>7</sup> Policy DS1 explains that the requirement is 12,400 homes "*including 2,800... to contribute to Coventry's unmet needs.*"

<sup>8</sup> The submission version of the Coventry Local Plan (2025) states: "*The Local Housing Need for Coventry for the period 2021-2041 is therefore 29,100 (1,455 per annum) and this will be delivered fully within Coventry's administrative area.*" It then goes on clearly to state that the housing requirement is 29,100 homes and that the total identified supply is 31,954 homes (i.e. there is a healthy 'supply buffer'). Furthermore, subsequent to the plan being finalised (in late 2024) the Government published the new standard method, which assigns Coventry a lower housing need figure of 1,388 homes per annum.

<sup>9</sup> The Leicester Local Plan is nearing adoption and generates very significant unmet need, but a preferred broad approach to addressing this unmet need has been agreed amongst the Leicestershire local authorities. No requests have been received in respect of providing for unmet housing need from Leicester. It is noted that the Leicester Local Plan looks only to 2036, such that there will likely be further unmet need to be dealt with in the near future (following a plan that looks further ahead, e.g. to 2045) and, as part of this, there could be pressure for growth in the vicinity of Hinckley, which links closely to Rugby Borough. However, there is also a need to factor in the context of Local Government Reorganisation (LGR) and Devolution.

Aside from Leicester, it is recognised that there are major challenges dealing with unmet housing need arising from Greater Birmingham, but attention focuses within an established housing market area that does not include Coventry or Rugby. The Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA; 2022) was clear that: "*Both Stratford-on-Avon and North Warwickshire districts sits across the Coventry & Warwickshire and Greater Birmingham Housing Market Areas. These authorities will therefore need to consider unmet needs from Birmingham in setting housing targets within their respective local plans alongside any unmet needs from within the Coventry & Warwickshire HMA.*"

*“Considering the sensitivity analyses undertaken, there is sufficient workforce available to support the jobs growth envisaged even with no growth in in-commuting and no changes in economic participation.*

*Drawing the evidence together, the evidence points to a broad alignment between homes and jobs within the sub-region; but with the potential for growth in economic participation over the coming decades to support some additional employment growth. The latter essentially represents a degree of potential labour supply flexibility.*

*Overall, the evidence points to no need to plan for housing provision above the standard method within the HMA.”*

5.2.10 Two final high level considerations with a bearing on the question of whether there is a need to explore ‘higher growth’ scenarios at this stage are as follows:

- Affordable housing need – is quite high as a proportion of LHN, such that a housing requirement set at LHN would not provide for affordable housing need in full (recognising that affordable housing is delivered by market led housing schemes at a rate limited by development viability), and it can also be noted that Coventry’s affordable housing need is very high as a proportion of LHN.<sup>10</sup> Specifically, the Updated Housing Needs Evidence for Rugby Borough (2025) identifies a net need for affordable housing of 338 homes p.a., although if those already housed are excluded this reduces to 202 homes p.a., which is equivalent to 32% of the standard method LHN figure (636 per year). The study also notably concludes:

*“The analysis has taken account of local housing costs... along with estimates of household income. The evidence indicates that there is an acute need for affordable housing... The majority of need is from households who are unable to buy OR rent and therefore points particularly towards a larger and more acute need for rented affordable housing than for affordable home ownership.”*

The Government’s Planning Practice Guidance (PPG) states that a boost to the housing requirement *“may need to be considered where it could help deliver the required number of affordable homes”*. However, boosting a housing requirement in order to provide more fully for affordable housing need is a complex matter (see further discussion within the Development Needs Topic Paper, 2025).

As a final point, it can be noted that a previous study, namely the Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA; 2022) did not suggest a need to boost the housing requirement in Rugby Borough:

*“In setting housing [requirements] in individual local plans, the affordable housing evidence is also relevant. In the northern part of the sub-region in particular – in North Warwickshire and Nuneaton and Bedworth – this supports the case for considering [a housing requirement > LHN] in order to boost... affordable housing.”*

- Recent rates of delivery – over the past 10 and 20 year periods Rugby Borough’s housing stock has grown at a rate significantly above the average for the West Midlands and for England as a consequence of past policy decisions, particularly the identification of Rugby in the 2008 Regional Spatial Strategy for the West Midlands as a “sub-regional focus”. High rates of recent growth do serve as an indication that the market could potentially deliver high growth scenario (e.g. compared to many parts of the country where standard method LHN is far in excess of recent rates of housing delivery). However, there is no reason to suggest that the past policy position from 2008 remains extant and, in absence of a strategic policy position regarding Rugby as a growth location, there is little reason to suggest that recent high growth indicates a case for continued high growth.

<sup>10</sup> For context, the Proposed Submission Coventry Local Plan (2024) requires affordable housing at a rate of 25%, and Policy DS2 (The Duty to Co-operate and partnership working) states: *“In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city’s wider housing needs being met.”*

## Employment land

- 5.2.11 As an initial point, attention can focus on industrial land, as whilst there is a need for additional office space (including R&D space) over the plan period, this is quite modest and is set to be comfortably met by new supply from sites that are already committed (specifically, sites with planning permission).
- 5.2.12 Focusing on industrial land, there is a distinction between:
- Need for industrial land on smaller sites – comprising land within use classes E(g)(iii) (industrial processes which can be carried out in a residential area without detriment to amenity), B2 (general industrial) and B8 (storage and distribution) which is delivered on sites of less than 25 hectares in area. This need is calculated based on past completion trends for Rugby Borough and was originally calculated in the HEDNA before being updated through the Alignment Paper to take account of additional more recent completions trend data. The Alignment Paper calls industrial need on smaller sites “non-strategic” site need. To be clear, this category of need includes a need for large units that are built on smaller sites.
  - Need for industrial land on larger sites – this comprises floorspace for B2, B8 and classes E(g)(iii) uses that is constructed on sites of 25ha or more, which can be described as “strategic sites”. This need derives from the West Midlands Strategic Employment Sites Study 2024 (WMSESS), and specifically its apportionment of part of the regional need to opportunity area 7 (Figure 5.2).<sup>11</sup> This apportionment is based on factors including access to the strategic road network, an assessment of junctions, access to labour and occupier market insights.
- 5.2.13 Focusing on need for strategic sites, there is a strong case to suggest that the entire opportunity area 7 apportionment from the WMSESS should be provided for in Rugby Borough given: A) a clear lack of capacity in Coventry; B) only a small part of Warwick District is within the opportunity area, and this is already allocated for development through the Coventry Gateway and Coventry Airfield schemes; and C) Nuneaton and Bedworth’s Local Plan is at a very advanced stage.
- 5.2.14 Taking this into account, the Development Needs Topic Paper (2025) sets out that:
- The gross need for strategic sites is 791,525sqm (226ha) and for non-strategic sites is for 232,600sqm (58ha) such that total gross need is 1,024,125sqm or 284ha.
  - After existing committed supply the net need for strategic sites is 310,711sqm (89ha) and for non-strategic sites is for 219,171sqm (55ha) such that total net need is for 529,882sqm or **144ha**.
- 5.2.15 Two further considerations that suggest a need to remain open to higher growth are: A) the Coventry Local Plan is set to generate an unmet need for non-strategic sites of 9ha; and B) the above figures are to 2042, but the WMSESS looks to 2045 rather than 2042.

## Gypsy and Traveller accommodation

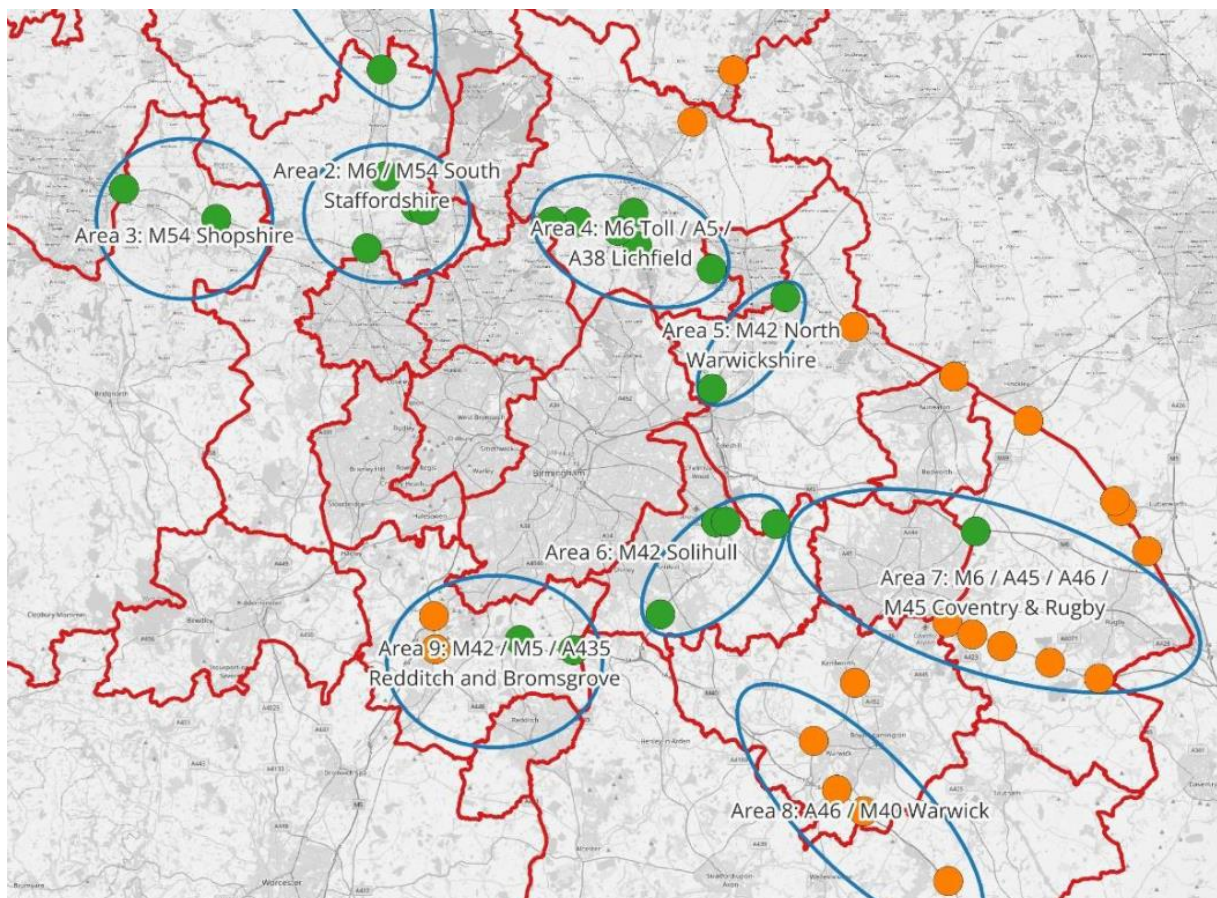
- 5.2.16 The Gypsy and Traveller Accommodation Assessment 2025 (GTAA) identifies a need for 94 pitches (1 April 2024 to 31 March 2042), but since completion of the assessment, planning permission has been granted for 14 further pitches. Also, the GTAA identifies the potential for household dissolution to provide a supply of 9 pitches. As such, there is a residual need for 71 pitches, which is significant.
- 5.2.17 The Local Plan must seek to proactively identify a supply of land to provide for this need; however, there is also the potential to set suitably permissive development management policy aimed at supporting supply from well located windfall sites over the plan period, plus there will be the potential to boost supply through local plan reviews.

<sup>11</sup> The WMSESS was preceded by the Coventry and Warwickshire HEDNA in 2022 and then followed by a Coventry and Warwickshire Alignment Paper in November 2024, which considered implications of the WMSESS for the sub-region.

## Conclusion on growth quanta

- 5.2.18 Beginning with housing, the strategic case for formally exploring growth scenarios that would involve a housing requirement set above LHN is overall not strong. At the Draft Plan stage earlier in 2025 the proposal was to set the housing requirement at LHN and there were limited strong arguments made for higher growth through the consultation. However, it is nonetheless prudent to test the possibility of higher growth, including recognising that the proposal is now to plan for a reduced plan period (to 2042). A lengthened plan period (e.g. 2045 as per the proposal at the Draft Plan stage) would result in an increase to housing need (e.g. three additional years would mean a need for 1,908 additional homes) and so there would be a need for commensurate additional supply in order ensure that the housing requirement can be set at LHN.
- 5.2.19 With regard to employment land (industrial land) there is a clear case for providing for the need figure discussed above which includes a significant contribution to sub-regional needs (N.B. this is a residual figure after having accounted for existing supply from completions and commitments). This is a high growth strategy, but it is in line with the proposed approach from the Draft Plan stage, which was broadly well received. There is limited strategic case for significantly lower or higher growth scenarios.
- 5.2.20 Finally, the Local Plan must also take steps to proactively identify new supply of Gypsy and Traveller pitches, although there is also the potential to assume some supply from windfall sites, assuming suitably permissive development management policy.
- 5.2.21 The question of growth quanta to reflect across the RA growth scenarios is returned to within Section 5.5 after having considered spatial strategy and supply options.

**Figure 5.2:** Strategic employment site opportunity areas (also two categories of SRN junctions)



## Broad spatial strategy

5.2.22 The aim of this section is to explore ‘broad spatial strategy’ issues, opportunities and options, building upon the introductory discussion presented in Section 2. It is important to re-emphasise that this amounts to an early high level discussion.

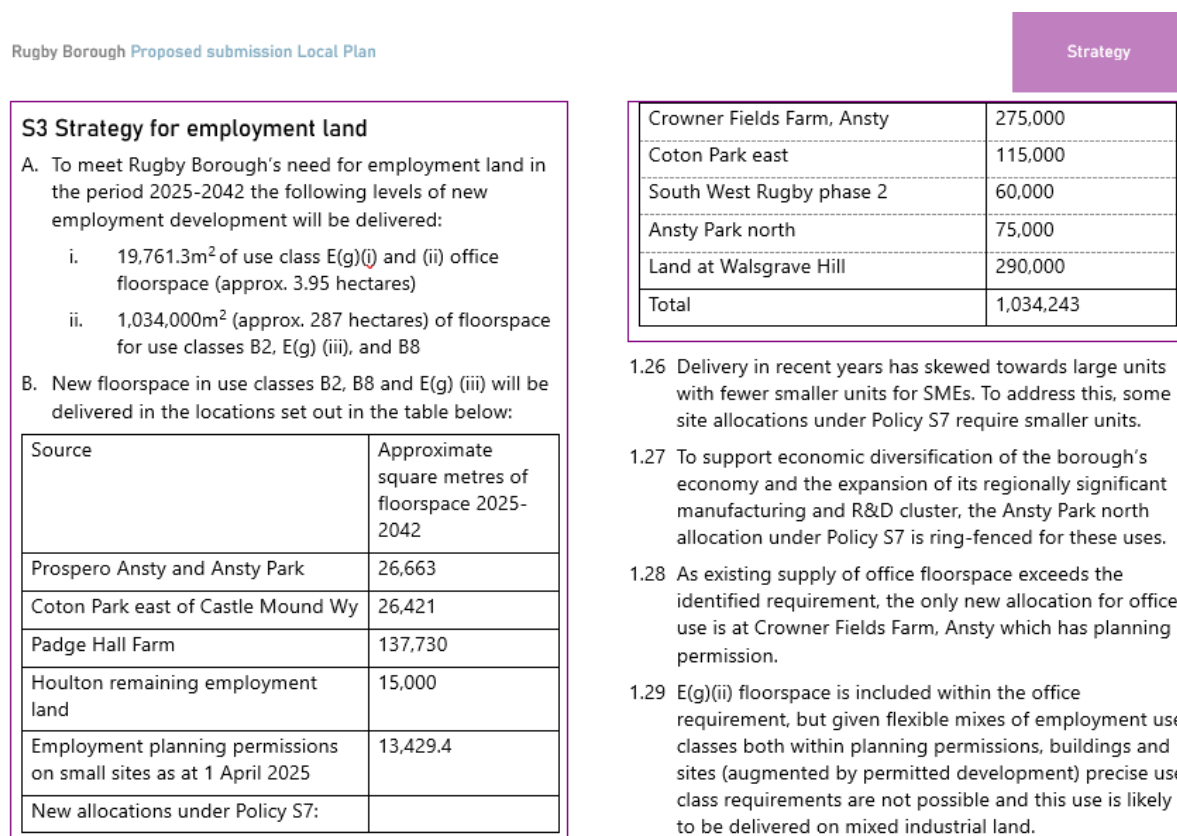
5.2.23 This sections considers:

- Employment land
- Housing
- Gypsies and Travellers pitches

### Employment land

5.2.24 The situation is complex, and so the most straightforward approach is to introduce the proposed strategy at the current time and then consider high-level arguments for potentially taking an alternative approach. Figure 5.3 shows the proposed strategy.

**Figure 5.3: The current proposed employment land strategy**



5.2.25 An initial point to note is that the total proposed supply to 2042 exceeds total need to 2042 – accounting for both ‘local need’ for non-strategic sites and an apportionment of ‘larger than local’ need for strategic sites – by 10,118sqm. Within this total supply it is understood that needs can be met for both non-strategic sites and strategic sites.

5.2.26 Planning for the local need plus the larger than local need for strategic sites represents a high growth strategy, whilst 10,118sqm represents a healthy ‘supply buffer’ and/or this figure could be considered as making a contribution to unmet need from Coventry.

5.2.27 There is little strategic case for questioning the preferred approach of: **A)** planning to 2042 rather than to 2045; **B)** seeking to provide for the full area 7 strategic need to 2042; and **C)** not seeking to provide for unmet need from Coventry in full (recognising that other authorities in the sub-region are also well placed to contribute).

- 5.2.28 Next there is a need to consider the distribution of strategic employment site allocations to deliver on the full area 7 strategic need.
- 5.2.29 The WMSESS recommended that provision for strategic sites in area 7 should include: A) 2-3 larger B8/mixed sites of circa 50ha; and B) 1-2 smaller B1/B2 sites.<sup>12</sup>
- 5.2.30 With regards to (A), the proposed supply (Figure 5.3) involves three sites of 50+ hectares in area 7, namely Padge Hall Farm, Crowner Fields Farm and Walsgrave Hill such that the recommendation is set to be met. Taking the sites in turn:
- **Padge Hall Farm** – is a cross-border permitted site located in the far northwest of the Borough, linking closely to Hinckley and Nuneaton. There is detailed permission for 55,740sqm B8 and outline permission for 80,610sqm B8 or B2.
  - **Crowner Field Farm, Ansty** – is located to the north east of M6 J2 and to the north of Ansty Park. It has permission for the creation of an employment-led headquarters campus, and the applicant was Frasers Group plc.
  - **Walsgrave Hill** – is located to west / south west of Ansty Park and directly to the east of Coventry. It is a key site for ongoing consideration noting that it was not a proposed allocation within the Regulation 18 Draft Local Plan.
- 5.2.31 Moving on to (B), the first point to note is that **Ansty Park North** is around 18.75ha and is overall a strongly performing site, particularly as it will deliver only E(g)(ii)/(iii)/B2 uses (i.e. not B8). It was an allocation at the Draft Plan stage, was held constant across the RA growth scenarios at that stage (i.e. it featured as an allocation across all the scenarios) and was broadly well received through the consultation.
- 5.2.32 The allocation of Ansty Park potentially meets the recommendation for 1-2 smaller sites of circa 25ha for B1/B2 in area 7. In addition, there are two further proposed allocations at or below 25 ha in size in area 7, namely **Coton Park East** and **South West Rugby Phase 2**, and both are somewhat committed such that there is little or no doubt that they do warrant allocation (the equivalent discussion in the Interim SA Report at the Draft Plan stage presented a detailed discussion before arriving at this conclusion). However, both sites would likely deliver primarily B8 as opposed to a mix of employment uses (Coton Park East is proposed to deliver 4,000sqm of smaller units). A further consideration is that capacity of SW Rugby requires careful consideration on account of adjacent biodiversity constraint, namely [Cawston Spinney](#) ancient woodland.
- 5.2.33 The discussion above serves to highlight that the proposed strategy has clear merit. However, there does remain a need to remain open to potential reasonable alternatives.
- 5.2.34 In this regard, the first matter for consideration is the possibility of allocating **Prologis Park West and Mountpark**, at Ryton-on-Dunsmore, which was a proposed allocation in the Draft Local Plan but is now an omission site. It is located on the south east edge of Coventry and was proposed to deliver 350,000sqm of employment space. It is well located in a number of respects, particularly from an agglomeration perspective (SE Coventry is a major regional hub for logistics, manufacturing and R&D); however, the issue is road junction capacity, with the Strategic Transport Assessment (2025) identifying the development would have a significant adverse impact on queuing at the Tollbar End A45/A46 interchange. The current proposal is to replace the site with Walsgrave Hill, which performs better in transport terms whilst being able to deliver a very similar scheme and in many ways sharing locational characteristics in terms of an edge of Coventry location and agglomeration benefits (Ansty Park is adjacent). Whilst there is no possibility of allocating both sites, it is reasonable to remain open to the possibility of allocating 'Prologis/Mountpark' instead of Walsgrave Hill, i.e. the Draft Plan approach. As part of this, it is important to note that as a larger site it could potentially boost the Local Plan's contribution to Coventry's unmet need recognising that, whilst it would be B8 led, the effect of edge of Coventry manufacturing / R&D agglomeration is to suggest very good potential to also deliver non-B8 uses (as per Walsgrave Hill).

<sup>12</sup> The HEDNA 2022 similarly recommended: "...whilst B8 demand is very strong... there is a need for separate allocations for B1c/B2 where land is delineated from sites going for B8 in order to support the manufacturing sector."

5.2.35 The other omission sites that were a focus of attention within the Interim SA Report at the Draft Plan stage (specifically the other sites that were ‘variables’ across the RA growth scenarios) were: A) **North of Houlton** (Site 130); and B) two sites southwest of Rugby / west of Dunchurch / north of **Thurlaston** (Sites 18 and 133). The key point to note is that these sites are located outside of the West Midlands Green Belt and, as such, there is a need to consider the possibility of allocating one of these sites in place of Walsgrave Hill, which is within the Green Belt and has been confirmed as mostly *not* grey belt through the Green Belt Assessment (2025). However, the location of both North of Houlton and the two Thurlaston sites away from Coventry is a major factor that weighs against allocation, including as they would be likely to deliver predominantly B8.

5.2.36 The next omission sites for consideration are then those associated with **Magna Park**, which is a major logistics centre located on the A5 to the north of Rugby, closely linked to the M1. The Interim SA Report at the Draft Plan stage gave careful consideration to the possibility of allocation, but ultimately ruled this out as a possibility, i.e. such that the option of an employment allocation here did not feature in the RA growth scenarios at that time. The situation is broadly unchanged, and the current Green Belt Exceptional Circumstances Topic Paper explains matters as follows (emphasis added):

*“The size of the land promoted at Magna Park means that this could, if allocated, remove the need for Green Belt employment allocations.*

*Disadvantages of the non-Green Belt options have been touched on above in the context of the discussion of commuting patterns. These concerns are particularly acute in relation to Magna Park given that site is removed from both Rugby and Coventry and draws 57% of its current workforce from Leicestershire...*

*Allocating a large employment site at Magna Park rather than the proposed Green Belt allocations close to Coventry would give rise to significant long-distance car commuting from Leicester, Coventry, Nuneaton, Hinckley and Rugby. The need for commuting from this wider labour catchment would be increased by the existing proposals to expand Magna Park included in the Harborough District Regulation 19 Local Plan.*

*The consequences of the further expansion of Magna Park in Rugby Borough for the highway network are discussed in the Strategic Transport Assessment which states:*

*“... it is clear that significant development trip volumes are expected at the A5/Cross in Hand roundabout... In addition to this, a significant amount of the trips to/from this site are predicted to route through the A426/A5 Gibbet Hill Roundabout. Given the capacity constraints that already exist at this junction, it is likely that the volume of additional traffic... would cause severe impacts on the SRN in this area.*

*Considering the above existing constraints, the lack of realistic cycling and walking opportunities, and limited bus service provision, combined with the significant trip generation predicted for this site, it is likely that there would be highway capacity issues associated with delivering this site which would be difficult to mitigate against.”*

*The operators of Magna Park, GLP, have a track record of delivering bus provision for staff. However, the distances involved mean this would not be as convenient as for sites close to the edge of Coventry and, in contrast to those locations, active travel would not be possible.*

*The NPPF advises that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes” (para 110). Further expansion of Magna Park would not be compatible with this objective.*

*At present, Magna Park is restricted by its planning permissions to being a B8 storage and distribution location. The site promoter has indicated that there is considerable scope and occupier interest in moving away from this and hosting more B2 or research and development uses in an expanded park. **However it is not realistic for Magna Park will be able to deliver the same diversity and growth in advanced manufacturing and research and development uses that could be delivered by the proposed allocations at Ansty Park and Walsgrave Hill, for the following reasons:***

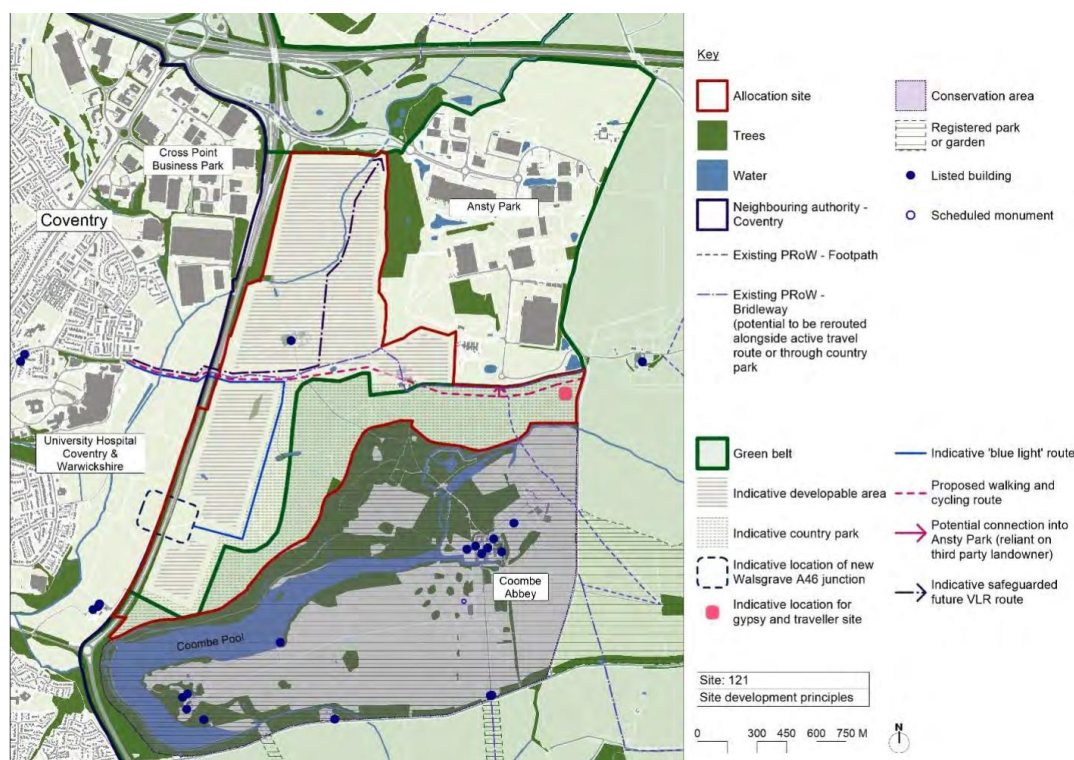
- *The WMSESS emphasises the importance to manufacturers of access to larger urban labour pools from which Magna Park is distant.*
- *Magna Park lacks the proximity to Coventry and Warwick universities...*
- *As the park at present is a logistics location, there are not the opportunities for clustering and synergies that exist on the edge of Coventry given the presence of existing important manufacturers and research institutes there....”*

5.2.37 There are also further employment omission sites and a number of these were discussed within the Interim SA Report, but all are sequentially less preferable to the sites discussed above, such that they need not be discussed further here.<sup>13</sup> Prologis Park West and Mountpark, Ryton-on-Dunsmore (‘Prologis/Mountpark’) is the key omission site for consideration within the Green Belt, whilst the key omission sites outside of the Green Belt are: A) North of Houlton; and B) the two sites at Thurlaston (Site 18 and Site 133). Allocating the two Thurlaston sites in place of Walsgrave Hill would mean an overall lower growth scenario, but this is a reasonable scenario to test.

5.2.38 In **conclusion**, this section has gone beyond considering matters relating to employment land broad spatial strategy by also considering specific site options. This is necessary because the two matters (broad spatial strategy and site options) are highly interlinked. The outcome of this discussion is that four RA growth scenarios emerge:

- Scenario 1 – the proposed submission approach (Figure 5.3)
- Scenario 2 – Scenario 1 but with Walsgrave Hill replaced by Prologis/Mountpark
- Scenario 3 – Scenario 1 but with Walsgrave Hill replaced by North of Houlton
- Scenario 4 – Scenario 1 but with Walsgrave Hill replaced by 2 sites at Thurlaston.

**Figure 5.4: The concept masterplan for Walsgrave Hill (adjacent to Ansty Park)**



<sup>13</sup> Para 5.2.42 of the ISA Report discussed broad locations for strategic employment sites and then there was a detailed discussion of options across paras 5.4.84 to 5.4.95 including a concise list of ruled out options, namely: Site 114 (NW Rugby); Site 253 (SE of Long Lawford); Site 94 and Site 141 (M69 J1); Site 121 and other sites near M6 J2; Site 321 (south of Hinckley); Site 71, Site 138 and others at Ryton-on-Dunsmore; Site 331 (north of Magna Park); and Site 31 (south of Magna Park). A shortlist of smaller employment omission sites was also presented; however, the clear view now is that there is limited strategic case for any such allocations, given the potential for needs to be provided for via smaller units coming forward as part of mixed strategic employment sites. One small site of note is Site 53 at Ryton-on-Dunsmore, which the Site Assessment Topic Paper (2025) explains “could be an option for a small-scale employment... allocation in a neighbourhood plan.”

## Housing

- 5.2.39 Whilst the Interim SA Report at the Draft Plan stage presented a lengthy discussion here, a more concise discussion is now appropriate for the following reasons:
- The residual number of homes that needs to be provided for in order to enable the housing requirement to be set at LHN, after having accounted for supply from commitments and a windfall assumption, is quite modest, and there are limited arguments for a housing requirement set above LHN (as discussed).
  - Specifically, need is understood to be 10,812 homes in total over the period 2025 to 2042 (636 dpa) such that the residual need is **1,969 homes** having accounted for supply from commitments and a windfall assumption (7,993 + 850 = 8,843 homes).
  - This residual need figure is slightly lower than at the Draft Plan stage (total LHN has gone down, due to a reduced plan period, but so has supply from commitments) and, furthermore, numerous of the Draft Plan allocations are now quite firmly supported in light of the consultation and wider evidence updates. Equally, some sites considered for allocation at the Draft Plan stage are now quite firmly ruled out of contention, in light of consultation and wider evidence updates.
  - Furthermore, since the Draft Plan stage detailed work has been completed to significantly boost supply from urban allocations. Specifically, there are now 16 urban area allocations with a total capacity of 703 homes, which compares to 3 allocations for 195 homes at the Draft Plan stage. There is clear support for / little or no basis to question this new boost to urban supply and, in turn, the residual housing requirement to provide for via greenfield allocations essentially reduces to **around 1,300 homes** (i.e. a much lower figure than at the Draft Plan stage).<sup>14</sup>
  - The overall implication that there are fewer choices now in respect of broad spatial strategy relative to the situation at the Draft Plan stage.
- 5.2.40 At the Draft Plan stage perhaps the key driving factor, in terms of broad spatial strategy, was to direct growth in line with the settlement hierarchy whilst ensuring a diverse portfolio of allocations, in terms of site type and geographical location. As part of this there was a strong focus on smaller greenfield sites that: A) are able to deliver early and have low delivery risk, such that they help to ensure a robust five year housing land supply and, in turn, help to minimise the risk of the Borough facing “the presumption”; and B) have strong development viability credentials such that they are able to deliver the full policy quota of affordable housing alongside delivering on wider requirements / expectations, for example in respect of infrastructure. To some extent this amounted to support for “**dispersal**”; however, it is important to recall that the overall land supply for the plan period is dominated by commitments (7,993 homes) and that the committed supply involves a major focus on supply from strategic urban extensions to Rugby.
- 5.2.41 To elaborate on the policy support for a strong element of ‘dispersal’ in respect of new proposed allocations, it is important to be clear that the aim is to avoid the mistakes of the past, in that a previous strong focus on supply from strategic urban extensions to Rugby has led to issues (this is also a common issue faced by other local plans nationally). Specifically, there have been unforeseen delays to delivery that have impacted the Borough’s ability to maintain a five year housing land supply and the sites in question have all faced viability challenges such that ability to deliver affordable housing, alongside delivering on wider requirements, has been severely limited (e.g. Houlton is delivering zero affordable). There are also wider arguments for dispersed smaller sites, e.g. supporting SME builders and supporting village-specific objectives.

<sup>14</sup> It is important to be clear that this is “residual need” figure is simply the difference between: A) LHN over the plan period; and B) supply from commitments, urban sites and a windfall assumption. This is the figure that must be provided for through allocations in order to arrive at a total supply figure that precisely aligns with LHN. However, in practice there is a need to identify additional supply from allocations such that total exceeds LHN, e.g. by 5% or 10%. A ‘supply buffer’ of this nature is important as a contingency for unforeseen delivery issues, i.e. with a view to ensuring that the housing requirement can be delivered in practice year on year (particularly in the early years of the plan period, ahead of a new local plan to boost supply). A strong focus on supply from existing committed sites and smaller greenfield sites suggests the need for a lower supply buffer (e.g. 5%), but the new focus on supply from urban allocations suggests the need for a larger buffer, e.g. 10%.

- 5.2.42 With regards to the possibility of one or more new strategic allocations (e.g. sites delivering several hundred homes or more), it is important to be clear that there are a wide range of theoretical arguments to be made in support of such sites, such that the aim of the discussion here is not to rule out the possibility of one or more allocations. Rather, the aim is to highlight that the high level case for supporting one or more such sites through the Rugby Local Plan is not as strong as is often seen elsewhere.
- 5.2.43 It is acknowledged that the County Council is supportive of concentrating growth at strategic sites as is the Coventry and Warwickshire NHS Integrated Care Board. This is a matter discussed further below under the 'New Settlement' heading in Section 5.4.
- 5.2.44 To summarise the discussion above, there are now relatively few 'headline' choices in respect of broad spatial strategy, given: A) a reduced residual need figure to be met through greenfield allocations; B) latest evidence on the merits of specific sites, including strong support for certain of the Draft Plan allocations; and C) continued strong support for distributing new allocations in line with the settlement hierarchy and ensuring a strong element of dispersal (to ensure a balanced overall supply portfolio).
- 5.2.45 Final considerations here are then in respect of a number of important updates to the evidence base since the Draft Plan stage. Five topic areas are discussed in turn.
- 5.2.46 Firstly, with regards to **schools capacity**, this was another key 'driver' of the spatial strategy, and definition of reasonable growth scenarios, at the Draft Plan stage, with understanding at the time being that: A) there was a need to deliver a new secondary school in the north of Rugby; and B) there was a need to assign growth to villages carefully accounting for existing primary school capacity, the potential for school expansions and a need to minimise children having to travel to school. However, the issue has now reduced, as shown by detailed modelling:
- 5.2.47 With regards to secondary schools, the modelling shows a shortfall of places across all year groups from 2027 onwards which rises to peak 478 in 2033-34 then drops with the opening of the South West Rugby Secondary School in 2035 before rising again to circa 300 in the last year of the plan period. This indicates that the maximum shortfall of spaces is fewer than three forms of entry. This is also supported by the shortfall of year 7 places, which is at its peak of 117 in 2029-30 fewer than three forms of entry, but fluctuates between one and three form of entry. The most appropriate mitigation for this level of shortfall of places is likely to be expansion of existing schools, and the County Council has indicated that there is potential for up to three school expansions.
- 5.2.48 With regards to primary schools, the headline position borough-wide is a significant surplus of places, which likely reflects the outcome of lower birthrates alongside planned school openings. However, because primary school catchments are more localised, it is necessary to look at individual school place planning areas rather than just the borough-wide position. This indicates three planning areas which are projected to have shortfalls, namely: A) Rugby Rural; B) The Revel; and C) Wolvey and Bulkington.
- 5.2.49 With regards to (A), this primary school place planning area comprises five schools, but it is only two of them that are projected to exceed capacity, and at one of these schools the exceedance is marginal. This leaves Kightlow C of E Primary School in Stretton-on-Dunsmore, where demand for places is predicted to exceed the places available throughout the plan period. From 2033-34 demand is expected to exceed capacity by 100 places across years R-6. Demand for places in reception is expected to be between 40-50 places from 2028-9 onwards with 30 places available. This indicates demand exceeding capacity by half a form of entry in a single form of entry school.<sup>15</sup>

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<sup>15</sup> The position at Kightlow CofE Primary School is presented as a worst-case scenario on the basis that all children from new homes built in Stretton-on-Dunsmore attend the school; however, in 2023-24 only 54% of places at the school were occupied by children resident in Dunsmore Ward. The priority area for the school includes the parishes of Stretton on Dunsmore, Frankton, Marton, Princethorpe and Bourton and Draycote. All these parishes except for Marton lies within Dunsmore Ward. Marton lies within Leam Valley Ward. 10% of the school's pupils came from Leam Valley ward in 2023-24 and 12% in 2022-23. These statistics indicate that the consequences of the modelled increased demand at Kightlow CofE Primary School would be for a greater proportion of children to be admitted from the priority area and fewer from outside it than is currently the case. Across the Rugby Rural primary school place planning area the shortfall of capacity for years R-6 peaks in the plan period in 2040-41

- 5.2.50 With regards to (B) and (C), both areas comprise single schools, and it is important to note that the model presents a worst-case scenario because it assumes all pupil yield from new housing in Wolvey and Brinklow respectively would go to these schools which is an unrealistic assumption. Nonetheless, the projected shortfall of places (years R-6) remains marginal, peaking at 22 pupils at The Revel and 38 at Wolvey. When looking at just reception admissions, neither school shows a shortfall in spaces. Furthermore, supplementary analysis shows that only a proportion of local residents in both areas send children to the local school, which adds further comfort.
- 5.2.51 Finally, with regards to primary school capacity, it is important to note that surplus capacity can lead to school viability issues and so pressure for school closures, but this is not known to be a major risk locally at the current time.
- 5.2.52 A second new evidence base consideration is **Green Belt Assessment**, with a two stage Green Belt Assessment (GBA) having recently been completed following the introduction of 'grey belt' as a new category of Green Belt in December 2024 and publication of GBA guidance in early 2025. The Stage 1 assessment identifies large swathes of the rural area as provisional grey belt,<sup>16</sup> whilst land adjacent or in proximity to a 'large built up area' requires detailed consideration before identifying any provisional grey belt, which is the focus of Stage 2. Headline findings are:
- All land surrounding those villages distant from a large built-up area comprises grey belt, which includes Wolvey, Brinklow, Wolston and Stretto-on-Dunsmore.
  - Land adjacent or in close proximity to Coventry, Rugby, Hinckley or Magna Park (considered to represent a large built-up area in combination with Lutterworth) may not be grey belt due to making a strong contribution to Purpose A (preventing the sprawl of large built-up areas). This includes land surrounding the larger villages of Ryton-on-Dunsmore, Binley Woods and Long Lawford.
  - Stage 2 of the GBA then examines contribution to Purpose A in detail within the relevant areas and specifically examines 18 parcels intersecting 9 key site options. The conclusion is that 9 of the 18 parcels do not make a 'strong' Purpose A contribution hence they are provisional grey belt – see Figure 5.5.

**Figure 5.5: Stage 2 Green Belt Assessment summary findings**

Parcel Ref	Site	Potential grey belt?	Area (ha)
NB 01	Site 114: Land at M6 Junction 1, Newbold on Avon and Long Lawford	No	212.18
NB 02	Site 114: Land at M6 Junction 1, Newbold on Avon and Long Lawford	Yes	45.16
NB 03	Site 114: Land at M6 Junction 1, Newbold on Avon and Long Lawford	Yes	8.81
LF 01	Site 253: Lawford Fields Farm, Long Lawford	No	26.57
LF 02	Site 253: Lawford Fields Farm, Long Lawford	No	12.42
LL 01	Site 316: Land at Long Lawford	No	50.92
WL 01	Site 121: Land at Walsgrave Hill	No	179.16
WL 02	Site 121: Land at Walsgrave Hill	Yes	23.00
CF 01	Site 95: Land at Crowner Fields Farm and Home Farm	No	109.13
CF 02	Site 95: Land at Crowner Fields Farm and Home Farm	Yes	9.53
PR 01	Site 328: Land at Prologis Park West	No	127.08
PR 02	Site 328: Land at Prologis Park West	No	23.23
PR 03	Site 328: Land at Prologis Park West	Yes	14.22
PR 04	Site 328: Land at Prologis Park West	No	38.22
PR 05	Site 328: Land at Prologis Park West	Yes	60.45
TP 01	Top Park, Top Road, Barnacle	Yes	1.90
LE 01	Lea Crescent, Newbold	Yes	1.97
BB 01	Bryant's Bungalow, Brandon Lane	Yes	1.93

and 2041-42 and 44 and 53 places. The shortfall in places in reception across the planning area peaks at 6 and 7 in the same years. These shortfalls do not indicate a need for school expansion, but there will be a need for close monitoring.

<sup>16</sup> Specifically, this land is "provisional" grey belt subject to consideration of NPPF footnote 7 constraint. However, the Draft NPPF published for consultation on 16<sup>th</sup> December 2025 proposes to remove footnote 7 constraint as a factor for the purposes of identifying grey belt, such that it may transpire that all currently identified provisional grey belt is in fact grey belt.

- 5.2.53 A third new evidence base consideration is **Strategic Transport Assessment (STA)**, with work now having been completed to model the impacts of various growth scenarios, accounting for modal shift and mitigation assumptions. This is an inevitably complex exercise, but an initial point to note is that it identifies the “sensitive locations”: 1) A5/A426/Gibbet Hill Roundabout; 2) A426/A4071 Avon Mill/Hunters Lane (an improvement scheme is proposed); 3) A426/Boughton Road Roundabout; 4) Rugby Gyratory; and 5) A45/A46 Toll Bar End junction.
- 5.2.54 A second point to note is that the STA has significant implications for employment strategy / site selection, which is a matter that has been discussed above, and which is also discussed further below in Section 6.
- 5.2.55 With regards to housing growth, the STA flags limited concerns regarding a strategy involving modest proposed new allocations distributed accounting for the settlement hierarchy with an element of dispersal (see discussion above).
- 5.2.56 Finally, the STA looks at two large-scale strategic site options, namely:
- Lodge Farm – is a new settlement option between Rugby and Daventry that was an omission site at the Draft Plan stage but nonetheless was closely considered through the appraisal of RA growth scenarios within the Interim SA Report. Transport is a major issue, in that there would be a need to deliver major transport upgrades and the achievability, suitability and viability of the necessary upgrades is highly questionable (see further discussion below).
  - North West Rugby – again was an omission site at the Draft Plan stage but was closely considered through the appraisal of RA growth scenarios. It performs better in accessibility and transport terms, and a package of necessary transport upgrade interventions has been identified that is likely achievable; however, the cost of delivering the necessary upgrades would again lead to viability challenges.
- 5.2.57 A third new evidence base consideration is **Viability Assessment**, with a key aim being examine the plan as a whole and consider whether allocations will be able to viably deliver the full policy quota of affordable housing alongside delivering and/or making a financial contribution (CIL / S106) to infrastructure as necessary and also delivering on wider policy ‘asks’ with cost implications, for example in respect of net zero development. Additionally, viability work has specifically considered the two key strategic site options introduced above, namely Lodge Farm and North West Rugby.
- 5.2.58 Taking these matters in turn:
- Whole Plan Viability – the viability of proposed allocations varies considerably, ranging from allocations at rural villages where viability is strong to urban allocations where viability is very challenging. The implication of challenging viability with respect to the new proposed urban allocations is that: A) delivering affordable housing will be challenging, which then lends weight to the argument for supporting small to medium sized greenfield allocations at villages that can viably deliver affordable housing, with a view to delivering on borough-wide needs; and B) challenging viability could lead to a need for protracted negotiations or otherwise could lead to a risk of site delivery being delayed or even a risk of sites not coming forward at all; which, in turn, serves to highlight the importance of a robust supply of greenfield sites able to deliver early and with lower delivery risk. Two headline conclusions from the Whole Plan Viability Assessment are as follows:  
  
*“We have appraised residential schemes with a range of affordable housing from 0% to 50%, which covers the... percentages sought by emerging Policy H2 (20% on developments in the Rugby Urban Area; 30% elsewhere; and 40% on sites released from the Green Belt). While there is a range of viable percentages... the emerging policy requirement can be achieved in most scenarios. A limited amount of scheme-specific testing may be required... particularly on sites brought forward on previously developed land in the Rugby Urban Area.*”

*“Where developments are of strategic scale, our appraisals indicate that they may not be able to viably absorb the additional infrastructure required, as well as providing 30% affordable housing (or 40% affordable housing when developments are brought forward on sites released from Green Belt).”*

*“Policy 16 requires that developments contribute towards the provision of education. Our appraisals test the impact of contributions totalling £10,000, £15,000 and £22,500 per unit, and higher contributions clearly have an impact on the ability of developments to meet other policy objectives, notably affordable housing.”*

*“When the emerging policies are tested on a cumulative basis and having regard to the Borough’s housing land supply being predominantly greenfield sites, developments in the Borough will be able to absorb the cumulative impact of the emerging policies in most cases.”*

- Lodge Farm – Warwickshire County Council officers have assisted RBC officers in identifying indicative budget figures for the infrastructure needed to deliver Lodge Farm. These include £35m for a 5FE secondary school, £28m for two primary schools, £10m proposed by the promoters for bus routes, £7m for the cycle link to Dunchurch, £61m for a significant upgrade to the Thurlaston interchange (likely comprising grade separation) and £30m for an A45 bypass of the new village. The viability of this strategic infrastructure package is modelled in the Viability Assessment, and this shows that Lodge Farm is a long way from being a viable proposition even at 0% affordable housing. It would be necessary to significantly increase the number of dwellings and/or significantly cut the infrastructure which is needed to make the new village sustainable and mitigate its impacts.
- North West Rugby – the required on-site infrastructure is comparable to Lodge Farm and includes a secondary school and two primary schools. The largest highways infrastructure costs for the scheme would be widening two roundabouts, the creation of two new roundabouts, a new canal bridge and the creation of a link road between Overview Way and Cosford Lane. The combined estimated cost of these highways schemes is circa £35m.

The combined infrastructure bill means that the scheme could likely deliver 20% affordable housing, which is below the 30% current policy requirement and well below the new proposed 40% ‘golden rule’ for sites released from the Green Belt.

A related consideration is that North West Rugby is contingent upon an upgrade scheme being delivered by National Highways for the A426/A5 Gibbet Hill Roundabout. At present no preferred scheme has been identified and no upgrade is funded, which introduces, or adds to, considerable delivery risk.

5.2.59 A fourth and final new evidence base consideration is **Landscape Sensitivity Assessment**, with a considerable amount of work has been undertaken prior to and subsequent to the Draft Plan stage. This work is presented across three reports, namely: A) a report dealing with strategic sites, with select sites considered in particular detail via a “post mitigation assessment”; and B) a report dealing with non-strategic sites; and C) a report that considers the potential to justify designation of Special Landscape Areas and ‘Areas of Separation’. Taking these matters in turn

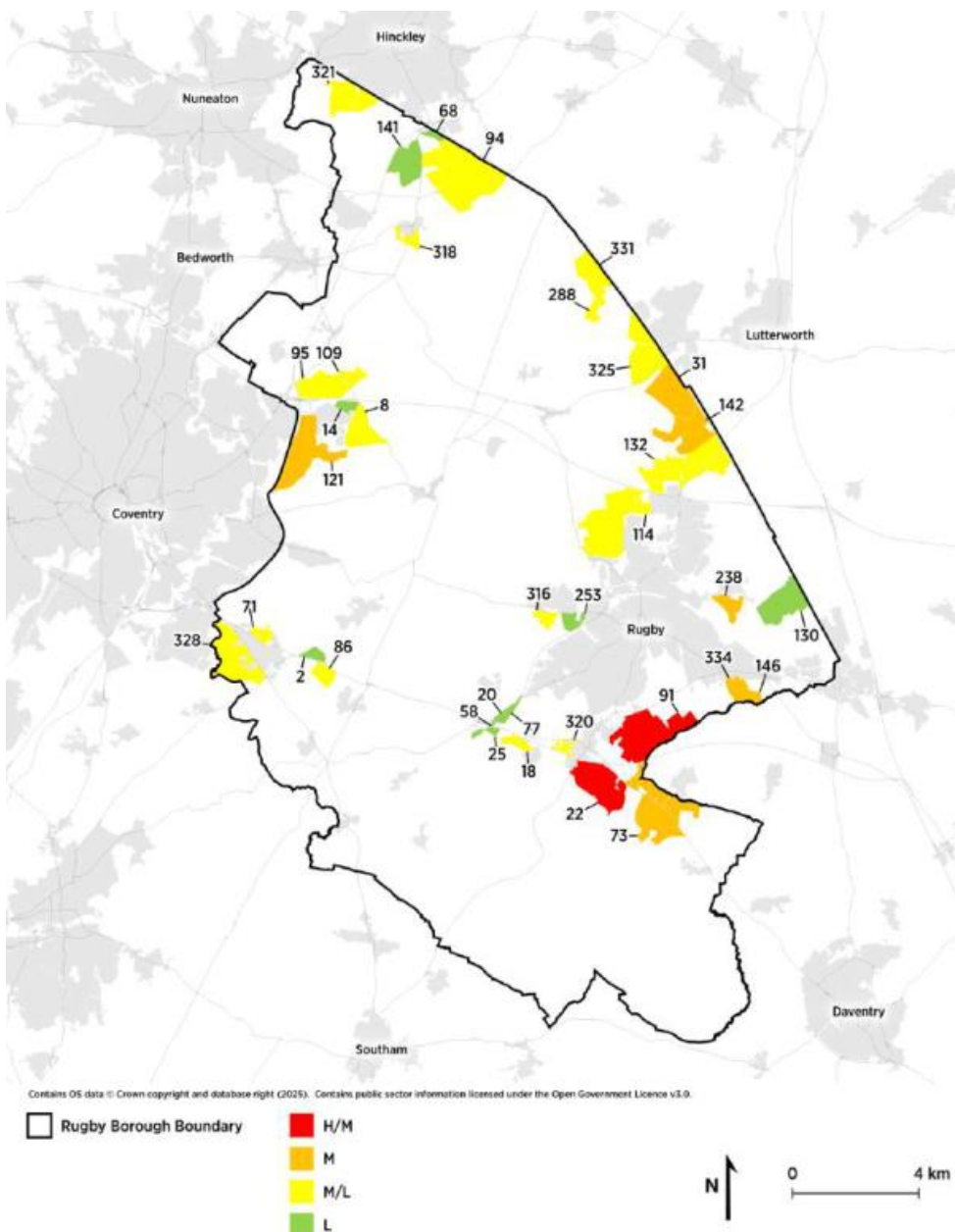
- Strategic site options – Figure 5.6, which also shows the overall sensitivity conclusion reached for each site, serving to highlight two large sites south of Rugby as more highly sensitive, although in practice neither site is considered a realistic contender for allocation. Figure 5.6 also shows two key site options (discussed above) as subject to a degree of constraint, namely Lodge Farm (site 73) and Land at Walsgrave Hill (site 21), whilst Land North of Houlton (site 130), which is discussed above as an employment land omission site that warrants ongoing close consideration, is shown as having low sensitivity. Finally, with regards to work to consider select sites in respect of the potential to mitigate landscape impacts, a key point to note is that Land at Walsgrave Hill has potential for mitigation leading to “medium/low” sensitivity.

- Non-strategic site options – key points to note include: A) one notable site is identified as having medium/high constraint, namely a previously proposed allocation at Wolvey (site 84); and B) a number of notable site options have “medium” constraint, including sites at Brinklow, Binley Woods and Clifton-upon-Dunsmore. Specific site options are discussed further in Section 5.4.
- Local landscape designations – a character assessment ahead of the Draft Plan stage explored three broad character areas – Dunsmore, Feldon and High Cross Plateau – and this informed a decision to designate one sub-area within the Feldon character area – the Ironstone Fringe – as locally significant.

However, further work undertaken subsequently does not support retention of that proposed designation. Subsequently further detailed work has been undertaken, and the new proposal is to designate the Rainsbrook Valley as locally sensitive. The proposed designated area abuts the southern edge of Rugby (Hillmorton), and there were two proposed allocations in this area at the Draft Plan stage.

- Settlement separation – the evidence base also includes an areas of separation study which highlights the risk of coalescence between Rugby and the villages of Clifton upon Dunsmore and Dunchurch/Thurlaston.

**Figure 5.6: Landscape sensitivity of strategic site options (pre-mitigation)**



## Gypsies, Travellers and Travelling Show People

- 5.2.60 For context, it is important to note that the adopted Local Plan 2011-2031 did not allocate land for pitches, which has had consequences not only for the Travelling community but also more widely in that the Council is often unable to resist unauthorised development and Traveller pitches have been approved on appeal; indeed, the Council has already lost two Gypsy and Traveller appeals in 2025.
- 5.2.61 Moving forward there is a need for a step change in respect of providing for Traveller accommodation needs, not only because failing to provide for accommodation needs has major consequences for the Travelling community, but also because failing to take a suitably proactive approach would represent a risk to the soundness of the Local Plan. In the case of the 2011-2031 Local Plan examination the Inspector was persuaded that a subsequent Gypsy and Traveller Site Allocations DPD would allocate land for pitches, but that DPD was abandoned, which is a common issue nationally.
- 5.2.62 There is now an opportunity to take a strategic approach (no local plan for the Borough has ever allocated sites for Travellers) and the current proposed approach is broadly unchanged from that at the Draft Plan stage, with three categories of allocation:
- Firstly, allocation of longstanding private sites which currently have temporary planning permission, which applies to sites at Rosefields, Wolvey and Top Park, Barnacle. These sites were allocations at the Draft Plan stage, although it is noted that Top Park, Barnacle was previously thought to involve 15 pitches but now is understood to involve 22 pitches, and there is surface water flood risk.
  - Secondly, new/expanded private sites at Bryant Bungalow, Brandon Lane, and Wilsher Ranch, Shilton Lane. Both of these sites were previous allocations at the Draft Plan stage, and the Interim SA Report flagged limited concerns. The former would involve expansion of an existing site, and the latter is in proximity to existing sites, which suggests good potential to provide for needs arising from existing sites. An issue with Wilsher Ranch, Shilton Lane is that allocation risks an over-concentration of pitches in one area; however, this is the only 'new' stand-alone allocation option that is available and reasonably in contention at the current time.
  - Thirdly, allocation of land for new private pitches as part of a large employment site allocations. Specifically, the current proposal is for an 8 pitch allocation within the Walsgrave Hill strategic employment allocation, whilst at the Draft Plan stage the proposal was to deliver pitches at Coton Park East and at Prologis Park West and Mountpark (which is now an omission site, as discussed). Delivering pitches as part of new employment allocations does not generate major concerns, including because the delivery risk is potentially less than is the case for pitches proposed as part of residential led strategic schemes, but masterplanning and design factors required careful consideration. Also, there is a need to recognise that pitches within employment sites may not be ideally located in the sense of being distant from the existing communities from where needs arise.
- 5.2.63 Overall, the current proposed allocations, together with other sources of supply, would deliver 68 pitches against a 2024-2042 need for 94 pitches. This comprises 45 pitches from allocations, 14 pitches from permissions and 9 pitches from household dissolution.
- 5.2.64 This would be adequate to demonstrate supply until the mid-2030s, plus there may be some windfall. Whilst in theory there is a need for ongoing consideration of higher growth scenarios, in practice there are limited options, with considerations being:
- There are no omission sites reasonably in contention for allocation.
  - There are not known to be any residential led schemes with potential to deliver pitches, e.g. this is not the proposal at either Lodge Farm or NW Rugby (and a requirement to deliver pitches could further impact already challenging viability).
  - Whilst consideration should continue to be given to the possibility of the Coton Park East employment allocation delivering pitches (as per the Draft Plan approach), this is not a matter that warrants further scrutiny here, i.e. via explore growth scenarios.

## Conclusion on broad spatial strategy

5.2.65 This section has covered:

- Employment land – this section goes as far as defining four RA growth scenarios.
- Housing – this section sets out key factors to frame the discussion of settlement growth scenarios in Section 5.4 and ultimately RA growth scenarios in Section 5.5.
- Gypsies and Travellers – this section is able to reach the conclusion that there is only one reasonable growth scenario, namely the proposed submission approach.

## 5.3 Site options

5.3.1 This section considers the process led by RBC officers to consider site options.

5.3.2 **Stage 1** in the process was the Housing and Economic Land Availability Assessment (HELAA). The first step was to seek possible sites for allocation by having a public call for sites, reviewing existing and lapsed planning permissions, reviewing allocations of land from the current Local Plan and officers identifying potential sites. The assessment then involved a desk-based review to consider availability, achievability and suitability, and sites that were discounted through the HELAA were not carried forward to Stage 2. Also, sites found to perform well through the HELAA, in that they are 'suitable', were not taken forward to Stage 2 (i.e. the aim of Stage 2 is to focus on the more marginal sites).

5.3.3 A HELAA addendum was produced following Regulation 18 Draft Plan stage adding 11 further sites and updating the analysis for 5 previously assessed sites.

5.3.4 **Stage 1b** is then the Urban Capacity Study (UCS). This complements the HELAA by identifying additional potential capacity for new residential development within the Rugby urban area, beyond the sites included in the HELAA. The UCS proactively assesses potential sites using the Brownfield Land Register, Rugby Regeneration Strategy and fieldwork, in addition to those received by a specific call for sites. Sites are assessed using the same three core criteria as the HELAA: availability, achievability and suitability. The study identified 20 sites as being suitable, (potentially/likely) viable, and available. 11 of these sites are ultimately taken forward for allocation, whilst 9 sites are not taken forward, despite the UCS findings (3 of which were included in the HELAA) for quite clear cut reasons that are listed in Table 1 of the Site Assessment Topic Paper (2025). Additionally, one site was not found to be deliverable by the UCS but is taken forward by the Local Plan as a site allocation, with the reasoning set out in Table 2 of the Site Assessment Topic Paper. There is no reasonable need here, within the SA Report, to question the approach taken in respect of urban sites.

5.3.5 **Stage 2** is the 'Site Assessment'. It involved a series of workstreams:

- Site visits – were completed by RBC officers for all sites.
- Transport analysis – a range of quantitative and qualitative methods were employed, as discussed within the Site Assessment Topic Paper.
- National Highways – were consulted on sites likely to impact on the Strategic Road Network. Further National Highways comments on individual sites were not sought subsequent to the Draft Plan stage except as part of the Strategic Transport Assessment (which is discussed above in Section 5.2).
- Water Resources – to gain an understanding of potential foul water drainage or surface water drainage limitations, consultation with the relevant water company, Severn Trent Water, was undertaken. Also, following the regulation 18 preferred options consultation a stage 2 Water Cycle Study was prepared.
- Education – school place planning advice was sought from Warwickshire County Council, and some additional research to understand the capacities of local schools and by extension potential impacts from proposed development was also undertaken (as discussed above in Section 5.2).

- Landscape – detailed work has been undertaken as discussed in Section 5.2.
- Ecology – a desktop screening process was undertaken to identify sensitive sites given SSSIs, Local Wildlife Sites and distinctive habitats. For these sites a subsequent and more thorough assessment was then prepared. Assessments were updated following the Regulation 18 consultation where necessary.
- Heritage assets assessment – a preliminary desk-based screening was undertaken by the RBC conservation officer to identify those sites which may contain a designated heritage asset, or where development may impact on the setting of a designated heritage asset. Subsequent site visits and assessment of sites with potential sensitivities were undertaken by consultants. This identified where there may be impacts and what appropriate mitigation measures could be required. Further updates to this were made following the Regulation 18 consultation.
- Green Belt – this was a key input subsequent to the Draft Plan stage, as discussed above in Section 5.2. It allows for the identification of ‘provisional’ grey belt.
- Identification of opportunities – this considers opportunities for other public benefits that the proposed type of development could deliver. This principally draws in information supplied by site promoters.

5.3.6 The following statement from the Site Assessment Topic on method is of note:

*“Site analysis and selection is not a mathematical process. It is, unavoidably, an exercise in planning judgement. This is the judgement of professional planning officers at Rugby Borough Council. Officers have sought to synthesise all information available into an overall judgement on whether a site should be progressed as a site allocation. That judgement cannot reasonably, and should not, apply a simple decision tree e.g. all sites with landscape sensitivity “medium” or ecology sensitivity “high” are rejected. Similarly, judgements are relative rather than absolute. For many of the sites there are no absolute constraints that would prevent them being developed. However, they may nonetheless not be progressed because they are relatively more constrained than other site options. The overall judgement seeks to balance constraints and opportunities on each site. For example, a site with medium landscape sensitivity may have relatively lower sensitivity for other constraints or be well located and offer significant other opportunities when compared to another site with medium landscape sensitivity.”*

5.3.7 The Site Assessment Topic Paper presents a proforma assessment for 115 site options in total, and the outcome is that each site option is categorised as either: A) progressed as an allocation within the Local Plan; or B) not progressed (i.e. an ‘omission site’).

5.3.8 As such, when considering which sites should be a ‘variable’ across the RA growth scenarios (Sections 5.4 and 5.5), there is a need to consider: A) those proposed allocations where there is potentially a case for non-allocation; and B) those omission sites where there is potentially a case for allocation.

5.3.9 This situation is slightly different to that at the Draft Plan stage, at which time the outcome of the Site Assessment was a shortlist of site options with potential for allocation, such that the role of Sections 5.4 and 5.5. within the Interim SA Report was to form RA growth scenarios comprising combinations of the shortlisted site options.

5.3.10 The new approach of selecting proposed allocations through the Site Assessment process is reasonable recognising that it draws upon consultation and SA work from the Draft Plan stage, including the appraisal of RA growth scenarios from that stage.

5.3.11 In **conclusion**, the 115 site options considered within the Site Assessment Topic Paper are a starting point for the analysis below within Section 5.4 and, as part of this, weight should be given to the Topic Paper’s conclusion for each site option, namely: A) “progressed” as a proposed allocation; or B) “not progressed” i.e. an omission site.

## 5.4 Settlement scenarios

### Introduction

- 5.4.1 Discussion has so far focused on A) ‘top down’ consideration of strategic factors (growth quantum and broad spatial strategy); and B) ‘bottom-up’ consideration of site options.
- 5.4.2 The next step is to explore alternative ways of allocating sites in combination (‘growth scenarios’) in order to deliver on strategic objectives. This is done by sub-area, which in practice means considering individual higher order settlements in turn.
- 5.4.3 There is merit to planning at the settlement scale because objectives are often established at this scale which can then usefully feed into work to progress / rule out site options and define growth scenarios. For example, a site options might perform well when viewed in the context of other sites at the borough-scale, but when viewed at the settlement scale it might be found that there are preferable sites that would deliver on objectives, such that the site can be ruled out. Vice versa, a site might perform poorly when viewed through a borough-wide lens but better when viewed through a settlement lens because in combination with other sites it will deliver on objectives.

### Methodology

- 5.4.4 For each settlement the aim is to draw together the ‘top down’ and ‘bottom up’ inputs discussed above before concluding on scenarios to take forward to Section 5.5, where the aim is to combine settlement scenarios to form borough-wide RA growth scenarios.
- 5.4.5 Site options are discussed in a broad order of preference with attention focusing on those sites where the question of allocation versus omission site is more marginal. To elaborate, the aim is not to focus discussion on those proposed allocations that are considered relatively clear cut, nor those omission sites where there is not considered to be a strong case for allocation (given strategic and/or site specific factors).
- 5.4.6 It is important to note that the aim is not to present a formal appraisal, but rather to contribute to “an outline of the reasons for selecting” the RA growth scenarios ultimately defined in Section 5.5 and then subjected to appraisal in Section 6.

### Which settlements?

- 5.4.7 All of the higher order settlements (Rugby plus the nine main rural settlements) are considered in turn, before consideration is given to lower order settlements (rural villages) and then finally the possibility of a new settlement.
- 5.4.8 By way of further introduction to the nine main rural settlements, it can be noted that there are important differentiating factors including:
- Links to a higher order settlement – links to Coventry was a key factor influencing spatial strategy / site selection when preparing the adopted Local Plan, recognising that the aim was to provide for unmet need from Coventry, with the Inspector’s Report explaining: “...the four proposed MRS allocations at Ryton on Dunsmore, Binley Woods and Stretton on Dunsmore are close to the urban edge of Coventry and well connected to it by the strategic road network (via the A46 and A45).”<sup>17</sup> There is no need to provide for unmet need from Coventry at the current time, but it remains the case that access to a higher order settlement is a key consideration.
  - Rural Sustainability Study (2025) – scores villages by access to services, public transport and internet. Dunchurch has comfortably the best overall score, followed by Binley Woods and Wolston, whilst Wolvey has the lowest overall score followed by Ryton-on-Dunsmore. Of the remaining villages, there is a notable distinction between two with a better local offer (Brinklow and Clifton upon Dunsmore) and two with better public transport (Long Lawford and Stretton-on-Dunsmore).

<sup>17</sup> The adopted Local Plan also directed two allocations to Wolvey (less well linked to Coventry), but one was a previously developed site not within the Green Belt and the other was a very small site (15 homes).

- Green Belt – seven of the nine are within the Green Belt, specifically all bar Dunchurch and Clifton upon Dunsmore. Three of the seven Green Belt villages are located close to the edge of a large built-up area, namely Binley Woods, Long Lawford and Ryton-on-Dunsmore such that there is the potential for land around the village to make a contribution to Green Belt Purpose A (as discussed).

5.4.9 Finally, there is no need for specific sections covering the possibility of growth at either:

- Edge of Coventry – there are no clear options for housing growth on the edge of Coventry, with attention instead focusing on villages near to the Coventry. The A46 “represents a strong, clearly defined boundary” to the City (para 72 of the adopted Local Plan Inspector’s Report), whilst land in the vicinity of the two junctions is suited to employment land as opposed to residential or mixed use development.
- Edge of Hinckley – land to the south of Hinckley within Rugby Borough is separated from Hinckley by the A5 and this is a sensitive Green Belt gap between Hinckley and Nuneaton. Land could be more suited for employment than residential (Padge Hall Farm is located here) but there are constraints including A5 junction capacity, an area of ancient woodland close to M69 J1 and higher quality agricultural land. It is recognised that a new Nuneaton Parkway in this area is a long term aspiration, as understood from the [Warwickshire Rail Strategy](#), but there is no certainty regarding the deliverability of any such scheme at the current time.

## Rugby (inc. Houlton and Newton)

5.4.10 In addition to supply from commitments (which is high, as discussed), the current proposal is to allocate 18 sites for a total of 1,258 homes.

5.4.11 Beginning with **the urban area**, two allocations from the Draft Plan stage are retained (Site 62, Morgan Sindall House; 90 homes; and Site 332, Albert Street; 25 homes) and then there are 13 new proposed urban allocations for a total of 583 homes following the Urban Capacity Study, as discussed in Section 5.3.<sup>18</sup> Within the scope of this current exercise (to define RA growth scenarios), there is no basis to question the proposed approach to urban supply from a suitability perspective. However, it is important to acknowledge that urban sites can tend to be associated with high delivery risk and/or viability challenges such that they risk not being able to deliver the full policy quota of affordable housing; indeed, it is common for urban sites to not deliver any affordable, even in parts of the country with strong development viability.

5.4.12 With regards to non-urban allocations, a first port of call is Land south of Crick Road, Houlton (**Site 338**; 250 homes) which is unchanged from the Draft Plan stage. This is an existing employment allocation, but is now being promoted for residential, which does not generate significant concerns, given the extent of employment land nearby. The safeguarded land for Rugby Parkway Station is adjacent, such that the site should be suitable for higher density development. Overall, this site performs very strongly.

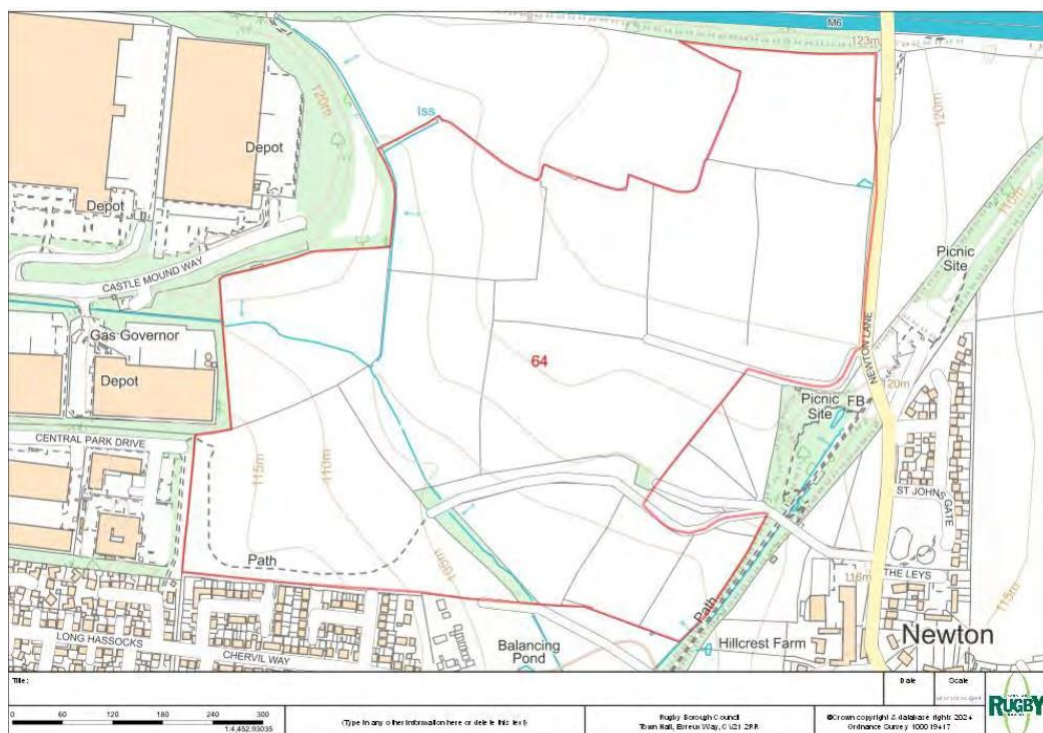
5.4.13 The other non-urban allocation that is unchanged from the Draft Plan stage is Hillcrest Farm, Newton (**Site 87**; 25 homes). This comprises previously developed land (farm buildings; not shown on the pre-WWI OS map) and, whilst Newton is a ‘rural village’ in the settlement hierarchy, it has comfortably the highest ‘settlement score’ of any of the rural villages, as understood from the Rural Sustainability Study (2025), largely on account of good links to Rugby. At the Draft Plan stage the equivalent discussion within the Interim SA Report gave weight to a proposal to boost Newton’s settlement score with the allocation of land nearby for a secondary school (discussed below), which is no longer the proposal (as discussed in Section 5.2), but regardless Site 87 is a strongly performing site. The equivalent discussion in the Interim SA Report also explained:

<sup>18</sup> Site 153 – Westway Car Park (24 homes); Site 279 – Stagecoach Car Park (32 homes); Site 283 – Rugby Central Shopping Centre (200 homes); Site 294 – Land adj. 9 Railway Terrace (14 homes); Site 349 – Land rear of Albert Street (5 homes); Site 350 – Rounds Gardens (70 homes); Site 351 – North of Rounds Gardens (60 homes); Site 352 – Former snooker hall, Railway Terrace (7 homes); Site 353 – Town Hall (114 homes); Site 354 – 92 Lower Hillmorton Road (34 homes); Site 355 – Land adj. 44 Craven Road (5 homes); Site 356 – The Railings (NHS) Rugby (10 homes); and Site 357 – 28-29 High Street (8 homes).

*“there is a need to consider how links west to Rugby might be improved... Another consideration is that the landowner has promoted a larger scheme to include greenfield land, and so the question arises as to whether there is a case for planning comprehensively for growth west of Newton, with a view to securing benefits (e.g. connectivity; feasibly a primary school) and addressing constraints (e.g. the former railway line to Lutterworth/Leicester is a Local Wildlife Site, LWS).”*

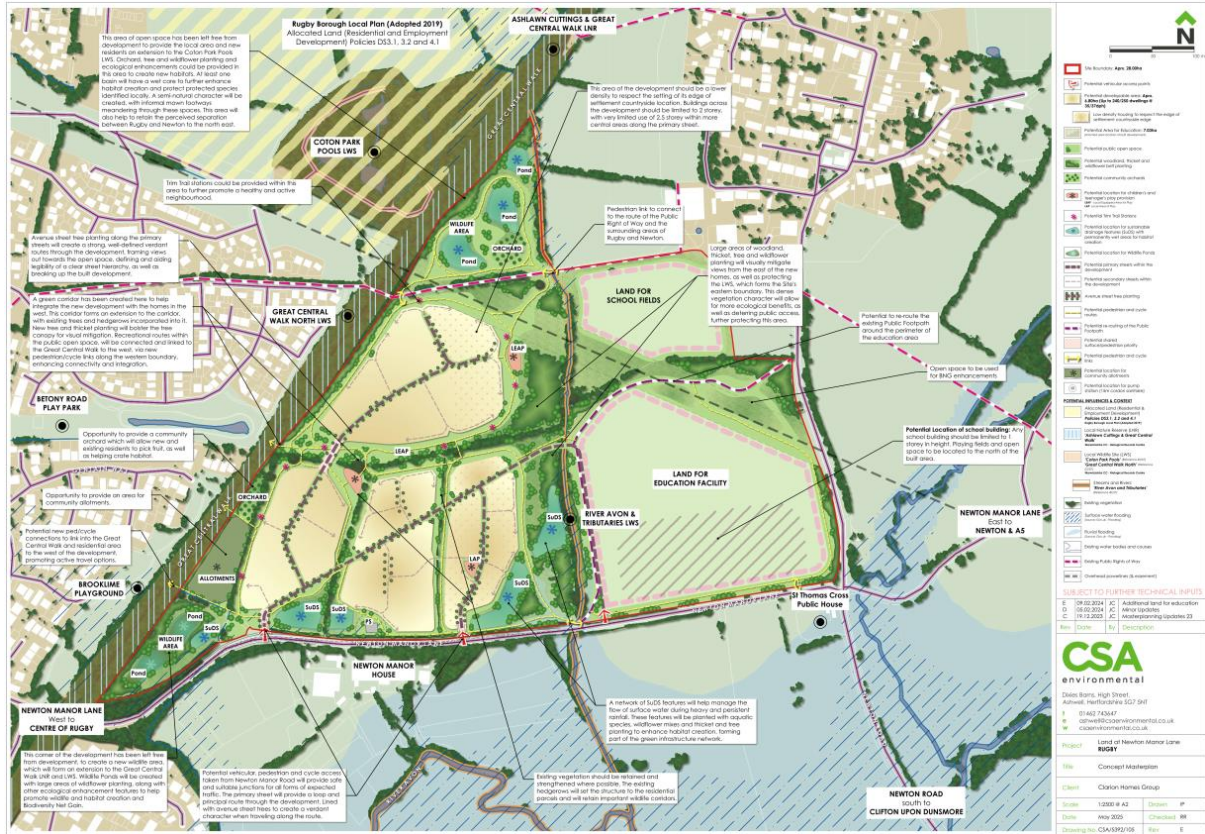
- 5.4.14 A representation was then received through the Draft Plan consultation proposing a 65 home development at Site 87 along with a small employment development to the north. The case for limiting housing growth at Newton is recognised, and the proposed employment site may not be suitable (Coton Park East is adjacent), but consideration might be given to ensuring comprehensive growth that leverages the maximum planning gain, rather than risk piecemeal growth over time with opportunities missed. Figure below shows Newton in the context of Coton Park East (Site 64), with the sites in question located directly to the west and north of Newton.

**Figure 5.7:** Coton Park East providing important context to growth at Newton



- 5.4.15 The final proposed allocation is then Newton Manor Lane, Brownsover (**Site 59**; 285 homes), where the proposal is now to increase the site capacity by 45 homes relative to the Draft Plan stage. The site is located close to Site 87 and was supported at the Draft Plan stage partly because the landowner was committed to making adjacent land available for the aforementioned secondary school that is no longer required. However, the site is considered to have merit as an allocation regardless of the secondary school consideration. It is noted that the proposed list of site-specific requirements is now lengthier, compared to that at the Draft Plan stage, which is presumably a reflection of the boost to capacity. Ensuring good links into Rugby is a key consideration, and ongoing consideration should also be given to ‘future proofing’ in light of the ongoing possibility that a secondary school is required on adjacent land (it is noted that site promoter’s 2025 consultation response was clear that land can be made available).

Figure 5.8: Concept masterplan for Site 87 submitted by the site promoter in May 2025

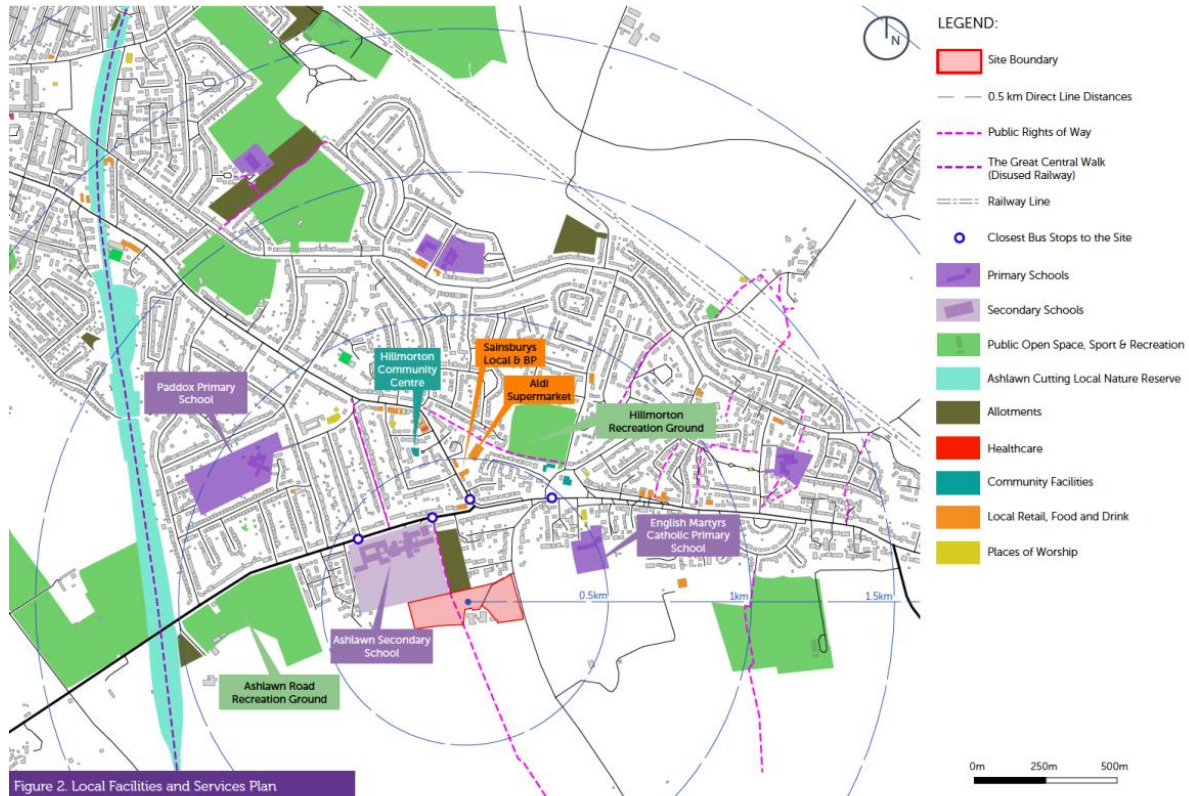


- 5.4.16 Overall, there is not considered to be a reasonable lower growth scenario for Rugby. However, there is a need to consider higher growth involving allocation of one or more omission sites, given Rugby's position in the settlement hierarchy and notwithstanding the high level of commitments and also the fact that there are also nearby proposed allocations at Clifton-on-Dunsmore and Long Lawford (discussed below).
- 5.4.17 With regards to omission sites, a first port of call is two sites that were previously proposed allocations at the Draft Plan stage, namely East of Kilsby Lane, Hillmorton (**Site 40**; 125 homes) and Barby Lane, Hillmorton (**Site 334**; 150 homes).
- 5.4.18 The key issue with these sites relates to their position at the northern extent of the Rainsbrook Valley, which is now proposed to be designated as an area of landscape sensitivity (as discussed). However, otherwise these sites perform reasonably well, particularly in transport and accessibility terms compared to other sites discussed below at lower order settlements. As such, on balance it is reasonable to progress the option of allocating both of these omission sites to the RA growth scenarios at the current time.
- 5.4.19 Finally, it should be noted that the capacity of Site 334 is now assumed to be 150 homes, rather than 380 homes as was the previous proposal at the Draft Plan stage (it is being promoted for 400 homes), in order to account for landscape sensitivity. It is not clear that the effect is to significantly reduce what the scheme can deliver beyond new homes; however, it is noted that at the Draft Plan stage a proposed requirement was: "Provision of land for expansion of English Martyrs Primary School (if required)."
- 5.4.20 The next omission sites for consideration are the remaining two sites that were previously allocations at the Draft Plan stage but are now ruled out for quite clear cut reasons, namely Fenley Fields, Rugby (**Site 122**; 80 homes) and Lea Crescent, Newbold-on-Avon (**Site 75**; 20 homes). The former site is no longer available, whilst the latter site comprises open space and, as a small site, there is no reasonable need to give further consideration here to the option of allocation as part of the current exercise.

- 5.4.21 The next omission site for consideration is then North West Rugby strategic urban extension (**Site 114**; 1,200 homes in the plan period), which was not an allocation at the Draft Plan stage but was examined in detail through the appraisal of RA growth scenarios. There is now considered to be a reduced case for allocation, in that: A) there is less case for allocation in quantitative terms, as discussed in Section 5.2; B) new evidence finds that the site mostly does not comprise grey belt; C) new evidence confirms the viability challenges that were previously suspected; and D) there is now no longer a need for a new secondary school in the north of Rugby, which was previously a key factor in support of exploring the option of allocation in detail. However, on balance it is nonetheless considered appropriate and ultimately reasonable to test the option of allocation, including because it is important to test the merits of supporting strategic growth locations as a comparator to the merits of a strategy focused on smaller sites (including because the County Council supports strategic sites and/or a concentration of growth at higher order settlements, as discussed further below).
- 5.4.22 The omission sites discussed above are those that are best performing such that there is limited pressure to consider further omission sites, given that the proposed submission allocations are all quite strongly supported and given the number of homes needed from allocations at Rugby under a reasonable high growth scenario. However, on final site of note is **Site 16**, which is notably located adjacent to the west of Site 334 to the south of Rugby (Hillmorton). This site is not progressed to the RA growth scenarios, but its active promotion serves to highlight the need to take a comprehensive long-term approach to any growth in this area, i.e. avoiding problematic piecemeal growth with resultant issues and opportunities missed. As part of this, it can also be noted that Site 334 is a smaller part of a wider parcel of land that has been promoted as available for development. For context the figures below show the proposed concept masterplan for Site 16 and also the context of community infrastructure at Hillmorton. It is also important to note the context of nearby committed Rugby Parkway Station.

**Figure 5.9:** Concept masterplan for Site 16 submitted by the site promoter in May 2025



**Figure 5.10: Further information submitted by the promoters of Site 16**

5.4.23 In conclusion, there are **four reasonable growth scenarios** for Rugby:

- 1) The proposed submission approach (18 allocations for 1,258 homes)
- 2) Scenario 1 plus the two Hillmorton sites (1,533 homes in total)
- 3) Scenario 1 plus the North West Rugby (2,458 homes in total)
- 4) Scenario 1 plus the two Hillmorton sites and NW Rugby (2,733 homes in total)

## Binley Woods

5.4.24 This is the first of the Main Rural Settlements for consideration (by alphabetical order).

5.4.25 The village dates from the early to mid-20th century when plots of land for development were made available on an area of woodland / common-land. Accordingly, the village has low historic environment sensitivity and a distinct character and built form, having more-or-less not expanded beyond its original extent, although a small allocation from the adopted Local Plan (2019) was recently delivered.

5.4.26 The village benefits from excellent road connectivity to Coventry and the A46, although the corollary is that the A428 passes through the village. There is Green Belt sensitivity given proximity to Coventry, and there is also biodiversity sensitivity given nearby ancient woodlands. Primary school capacity is not thought to be an issue in that there is existing capacity and/or potential for expansion. Binley Woods has an overall settlement score of 47, such that it is the second best served village.

5.4.27 At the Draft Plan stage there were no proposed allocations; however, the new proposal is to allocate Oakdale Nursery, Binley Woods (**Site 54**; 43 homes). The Site Assessment Topic Paper (2025) concludes:

*“The site is adjacent to existing development, although it is removed from the Binley Woods and Brandon settlement boundaries. The main constraints relate to ecology which would require some mitigation to minimise adverse impacts on habitats adjacent to the site. There are Medium/Low landscape constraints. Part of the site also comprises standing water. Part of the site is provisionally identified as Grey Belt... It has a relatively high connectivity score and access via non-car modes would be feasible to services in Binley Woods such as the primary school. It is located alongside existing residential development and is partially previously developed land.”*

- 5.4.28 The equivalent discussion within the Interim SA Report at the Draft Plan stage did not flag this site as the best performing omission site (rather, it flagged Site 45, which is discussed below) and ultimately the site was not progressed to the RA growth scenarios at that stage. The report explained a concern that development *“would involve ribbon development along the A428 reducing the landscape gap to Brandon / Wolston.”* However, at the current time, in light of the new evidence / analysis, it is fair to conclude that this is a reasonably strongly performing site. This being the case, and because it is a fairly modest sized site, there is not considered to be a need to test the option of ‘non-allocation’ through the RA growth scenarios, i.e. it is progressed as ‘constant’.
- 5.4.29 There is not considered to be a strong strategic case for higher growth scenarios, including given the modest residual need for greenfield allocations after having considered supply from allocations at Rugby, and because there are not known to be any village-specific opportunities to be realised by higher growth. However, it is nonetheless appropriate to give brief consideration to select omission sites.
- 5.4.30 In this regard, a first port of call is potentially **Site 45**, which is a large site to the north of the village, however: achieving good access would be challenging; the A428 is a barrier to reaching the primary school; there would be a concern regarding achieving effective containment; the site is safeguarded for minerals extraction; and there is generally little strategic case for growth at this scale at Binley Woods (the village would benefit from new community infrastructure, for example a neighbourhood hub, but this would not be an appropriate location given it is separated from the village to the south by the A-road).
- 5.4.31 There is also a need to consider growth quantum from a primary school perspective, i.e. seek a modest quantum that can be accommodated in existing capacity or a large quantum that can fund an expansion. In this regard, it is noted that the consultation response received from the site promoter in 2025 pointed out that the landowner has control of all land between the village and the B4428 to the north, such that there is potentially the option of strategic scale growth. There is no clear case for this at the current time (and it is not actively being promoted), but it is worth highlighting given that this is an important sector of land to the east of Coventry (and noting proposed and potential employment land growth locations to the north and south).
- 5.4.32 Another omission site of note is then **Site 34** which is being actively promoted for housing, but which is supported for a community use, namely the restoration of Coventry Stadium for speedway and stock car racing and other motor sports together with other community uses (an element of enabling housing could feasibly be explored). This site is ruled out through the HELAA, such that it is not considered within the Site Assessment Topic Paper, but still warrants mention here, noting active promotion.
- 5.4.33 A final possibility is the sector of land to the south of the village, where the land has not been made available, but development could be relatively well contained in landscape / Green Belt terms. However, it appears that achieving good access (for cars and pedestrians/cyclists) would be highly challenging, plus there is biodiversity constraint.
- 5.4.34 In conclusion, only **one reasonable growth scenario** is taken forward, namely the proposed submission approach of allocating one site for 43 homes.

## Brinklow

- 5.4.35 Brinklow is a historic rural village located centrally between Coventry and Rugby and not very well linked by road, although there is good access to existing and proposed strategic employment sites to the west (Ansty Park and Walsgrave Hill). There is a designated conservation area and a large scheduled monument (Brinklow Castle).
- 5.4.36 There is limited strategic case for growth; however, there is one notably strongly performing site, namely West Farm and Home Farm, Brinklow (**Site 337**; 75 homes), which is a proposed allocation as per the Draft Plan stage. The site is predominantly PDL, well-contained in the landscape and adjacent to the village centre. There is historic environment sensitivity as the edge of the site includes a Grade II listed farm building and intersects the conservation area, and biodiversity constraint is a further consideration as the northern edge of the site comprises a LWS, but there is good potential for avoidance / mitigation.
- 5.4.37 The other proposed allocation is also retained from the Draft Plan stage but with a new reduced capacity, namely Land south of Rugby Rd, Brinklow (**Site 315**; 250 homes).
- 5.4.38 The Site Assessment Topic Paper concludes:
- “The site comprises arable fields and agricultural infrastructure situated at the southern fringe of Brinklow. The surrounding road network has medium levels of congestion, and the site has relatively weak assessed accessibility and connectivity. However, this reflects the score of a wider area and the site is walkable to services and facilities in the village. The site has medium ecological sensitivity and medium landscape sensitivity. There are greater potential heritage sensitivities. The site contains no designated heritage assets but lies immediately south of Brinklow Conservation Area. The field features ridge and furrow earthworks, that are remnants of historic agricultural practices, and contributes to the setting of the conservation area, Brinklow Castle, and the nearby grouping of historic farmsteads and agricultural buildings. The site provisionally lies in the Grey Belt. There is scope to mitigate against archaeological heritage constraints by restricting development to the western field which borders Heath Lane. This also reduces impacts on the setting of the conservation area and Brinklow Castle. To achieve this, the capacity of the site would be reduced.”*
- 5.4.39 The new proposed approach of leaving the eastern field within the site boundary undeveloped will arguably lead to a somewhat incongruous built form, but the logic is clear in terms of minimising heritage impacts and protecting the village character. It is not thought that the effect of reducing the site capacity will be to impact development viability, e.g. with implications for affordable housing or infrastructure delivery. The Interim SA Report previously noted that *“as a larger site that is flat and largely free from constraints there should be good development viability with positive implications for affordable housing delivery. The site could deliver some limited benefits to the village, to include a children’s play area...”*
- 5.4.40 Overall, whilst Site 334 was identified as a marginal proposed allocation at the Draft Plan stage such that it was a ‘variable’ across the RA growth scenarios, at the current time it is considered to perform sufficiently well such that it can be progressed as a ‘constant’. New understanding that land surrounding Brinklow is grey belt feeds into this, and this decision is taken notwithstanding the lack of a village primary school.<sup>19</sup>

<sup>19</sup> The school site is split between Brinklow and Monks Kirby (~5km distant), but primarily at Monks Kirby (with only reception at Brinklow). This is a non-ideal situation, but there is a desire to support the Monks Kirby school site, which has capacity, rather than seeking to deliver a new school at Brinklow (which, in any case, would require a large quantum of growth, and likely a large strategic site). The school at Monks Kirby can likely be expanded if necessary.

**Figure 5.11: Ridge and furrow within Site 334 and across the wider area<sup>20</sup>**



- 5.4.41 There is not considered to be a strong strategic case for higher growth scenarios, including given the modest residual need for greenfield allocations after having considered supply from allocations at the settlements discussed above, and because there are no known village-specific growth opportunities to be realised. However, it is nonetheless appropriate to give brief consideration to select omission sites.
- 5.4.42 Specifically, two further options of note are **Site 24** and **Site 111**; however, the former is not well-contained in landscape / Green Belt terms and this sector of land may contribute to the setting of the conservation area, whilst the latter site was deleted as an allocation by the Inspector at the final stage of preparing the adopted Local Plan (see a detailed discussion across paragraphs 204 to 214 of the Inspector's Report).
- 5.4.43 In conclusion, only **one reasonable growth scenario** is taken forward, namely the proposed submission approach of allocating two sites for a total of 325 homes.

## Clifton-upon-Dunsmore

- 5.4.44 There is a strategic case for growth here as a Main Rural Settlement located outside of the Green Belt and well-linked to Rugby. However, the village has a relatively low settlement score (36).
- 5.4.45 The proposed approach is unchanged from the Draft Plan stage, namely allocation of three sites all located to the north of the village. The following bullet points provide an overview that is unchanged from the Interim SA Report at the Draft Plan stage:

<sup>20</sup> Sourced from the consultation response received from the promoters of Site 334.

- **Site 202** (80 homes) – is potentially the strongest performing of the three sites, as it is separated from the conservation area, generally well located in built form / landscape terms (although there is a need to question whether the site should utilise the entire field, with a view to a comprehensive scheme) and, as a larger site, is able to deliver transport upgrades and a children’s play area.
- **Site 129** (60 homes) – is located nearby to the east and, like Site 202, benefits from being a relatively flat site. Farm buildings located to the north may provide a degree of containment, but the conservation area is adjacent to the west, and there is poor containment to the south, where Site 83 is being promoted for 180 homes (and open space). Site 83 is also potentially sensitive in that it comprises the former landscaped grounds of Clifton Hall (albeit not listed; see historic mapping).
- **Site 307** (10 homes) – is a more challenging site as it is located to the west of the village, where the landscape falls away towards the Avon Valley. As a small site there are limited concerns, and site specific policy is set to require *“solely rear gardens along the western boundary of the site would not be supported to enable a more attractive settlement edge”*, but it is noted that a larger area of land has been promoted as available, and so there is a need to plan with a long term perspective. Access is on a bend on a minor residential road but is judged to be suitable.

5.4.46 These sites in combination would deliver 150 homes and, at the Draft Plan stage, the Interim SA Report explained that this was understood to be *“broadly the number of homes that can be accommodated without breaching the capacity of the village primary school, which is unable to expand.”* The latest situation in respect of primary school capacity is explained in the Education Topic Paper (2025) as follows:

*“Clifton-upon-Dunsmore CofE Primary School is... shown to have more demand for places than there are available places, however there remain a surplus of places in the wider Rugby North Central Primary School Place Planning Area of which the school forms part. Demand is projected to exceed available places by circa 50 places across year groups R-6 in the 2030s.*

*[The school] drew only 46% of its children from Clifton, Newton and Churchover Ward in 2022-23 and 45% in 2024-25. The remaining children were largely drawn from wards within the Rugby urban area. The priority area for the school is largely coterminous with Clifton upon Dunsmore and Newton and Biggin parishes and lies wholly within the Clifton, Newton and Churchover Ward. The homes planned at Newton Manor Lane on the edge of Rugby while lying within the ward, do not lie within the priority area for the school but are instead within priority area for Boughton Leigh Junior School in Brownsover. This means that the information presented in the model likely shows a worst case scenario in terms of future demand.*

*Notwithstanding that, it is clear that there is potential... for more children to be admitted to the school from Clifton upon Dunsmore village, as more homes are built there, with a corresponding reduction of children admitted from beyond the priority area. For this reason... new homes being built in the village are likely to reduce home to school transport needs. However, this does also support the view taken by Warwickshire County Council that the number of homes in the village should be restricted to avoid tipping the balance and creating the need for children to be bussed out of the village to attend other primary schools, bearing in mind that Clifton-upon-Dunsmore CofE Primary is single form of entry school.”*

5.4.47 Overall, and in line with the approach taken at the Draft Plan stage, there is not considered to be a reasonable need to explore a lower growth scenario. Another consideration is that growth at the village can assist with delivering Local Cycling and Walking Infrastructure Plan (LCWIP) Route 47 (park connector between Coton Park and Clifton upon Dunsmore) which connects to Rugby Station and the town centre.

5.4.48 Equally education capacity serves as an argument against higher growth. However, there is a need to consider possible alternative approaches to delivering ~150 homes.

5.4.49 In this regard, the following text from the Interim SA Report still broadly holds true:

*“The next port of call is then the option of expansion to the southwest of the village, where the land owner has proposed a large site for 700 homes to include a new primary school (**Site 238**), but has also proposed two smaller options, involving around 350 or 150 homes. The first thing to say is that there is no case for the middle option, including on the grounds of primary school capacity. With regards to the largest option (Site 238), this may warrant ongoing consideration, however: there is no clear strategic case for growth at this scale; there would be relatively poor links to the existing village; there would be landscape impacts (including noting a public footpath linking the village to the Clifton Brook / Oxford Canal corridor); and there would be a need to carefully consider performance in terms of transport and traffic factors (noting seemingly no potential to link directly to the new Houlton Way).*

*As such, attention focuses on the 150 home option (**Site 335**), which could be delivered in place of the three emerging preferred allocations discussed above (Sites 129, 202, 307). The views of the Parish Council and others on these two alternative approaches to growth at the village are welcomed through the current consultation; however, at the current time it appears that the emerging preferred approach (Sites 129, 202, 307 to the north) is clearly preferable to the alternative of Site 335 to the southwest. This is largely on landscape grounds, given Clifton-upon-Dunsmore’s characteristic hilltop location, but it is also the case that the site does not relate very well to the village (although the school and village centre would be within reasonable walking distance, plus the site is relatively well linked to Rugby), plus there would be a concern regarding further piecemeal growth to the east over time, leading to opportunities missed to secure infrastructure benefits alongside delivery of new homes.”*

- 5.4.50 The latest situation is: A) the Parish Council’s consultation responses received in 2025 objected to the proposed allocations but also did not support Site 335 as an alternative approach; B) Site 335 has been assessed as having ‘medium’ landscape sensitivity, C) a planning application has now been submitted (<https://www.rugbyroad.co.uk/>); and D) the proposed submission approach is to designate a settlement gap to Rugby.
- 5.4.51 A final omission site of note is then **Site 83** to the east, which has already been noted above in that it is located adjacent to Site 129. The site is being actively promoted, with a detailed consultation response having been received in 2025, but the Site Assessment Topic Paper concludes: *“The principal sensitivities relate to landscape and heritage. The site is in close proximity to two grade II listed buildings: The Old Hall and Clifton Manor. The site is an important element of the eastern gateway to/from the village, providing a rural backdrop to the conservation area and its listed buildings.”*
- 5.4.52 In conclusion, only **one reasonable growth scenario** is taken forward, namely the proposed submission approach of allocating three sites for a total of 150 homes.

## Dunchurch

- 5.4.53 Dunchurch is a historic village closely linked to an expanding Rugby and the M45/A45. The committed SW Rugby strategic urban extension is nearby, and a focus of detailed work has been on ensuring a landscape gap to Dunchurch and avoiding traffic impacts / realising transport opportunities. As discussed, Dunchurch has a high settlement score.
- 5.4.54 At the Draft Plan stage there were two proposed allocations, namely Homestead Farm Dunchurch (**Site 90**; 30 homes); and Land south of Coventry Rd, Dunchurch (**Site 341**; 180 homes) and, of these two sites, Site 341 was identified as a somewhat marginal allocation such that it was explored as a variable across the RA growth scenarios.
- 5.4.55 The Interim SA Report introduced these two sites as follows:
- “There is broadly a case to be made for focusing growth to the west of the village given... sensitivities to the east of the village... a first port of call is Site 90, which is considered to be a strongly performing site... Site 97 is then a large irregularly shaped site, where three options have been considered: development in full for 360 homes, with access from both the B4429 and Sandford Way (a residential road at the western edge of the village); B) a smaller scheme with access solely from Sandford Way (Site 41); and C) a 180 home scheme with access from the B4429 (Site 341).*

*... On balance Site 341 is preferred, because Sandford Way is not suited to significant additional traffic, and also noting a surface water flood zone at the western edge of Dunchurch. However, the proposed scheme (in combination with Site 90) would extend Dunchurch west along the B4429, and there is a need to ensure a comprehensive approach to growth, i.e. avoid a situation whereby there is ongoing pressure to develop the remaining parts of Site 97, with a resulting piecemeal development with opportunities missed to maximise infrastructure benefits..."*

- 5.4.56 At the current time the new proposed approach is to delete both of these allocations, particularly accounting for the sensitivities relating to nearby SW Rugby. However, it is reasonable to explore the possibility of allocation via the appraisal of RA growth scenarios, particularly given Dunchurch's location outside of the Green Belt and its high settlement score. There is a case for supporting a more modest scheme within Site 341, due access challenges, but on balance a 180 home scheme is assumed.
- 5.4.57 There is very little strategic case to be made for exploring further higher growth scenarios, but a key matter for ongoing consideration is ensuring a comprehensive approach to any growth to the west of the village, where: A) land directly to the west of the village, including Site 90 and site 341, has been promoted as available for residential development; and then B) sites further to the west, adjacent to the M45 junction, are being promoted for employment (including Sites 18 and 133 discussed in Section 5.2).
- 5.4.58 The furthest west of the sites being promoted for residential is **Site 42**, with the site promoter for this site having submitted consultation response in 2025 stating that the land is available for residential and not to deliver open space as part of a comprehensive strategic allocation (which is something that has been previously proposed as part of a concept masterplan for comprehensive growth). This serves to highlight the importance of giving strategic consideration to growth in this area with a long term perspective.
- 5.4.59 Final points to note regarding omission sites are:
- **Site 37** is a notable site option to the east of the village, but this is a sloping site with the parish church / conservation area uphill to the west, plus achieving good access onto the B4429 could prove challenging.
  - There are two small available sites to the north of the village, namely **Site 38** and **Site 74**. However, these sites are constrained in historic environment terms, as they are located adjacent to / either side of the historic gatehouse and tree-lined drive for Bilton Grange, which is a Grade II listed Registered Park and Garden.
  - A large area of land is available to the east of the village (**Site 91**), but strategic growth in this area is not supported including given topography / landscape factors and proximity to SW Rugby, which has faced delivery challenges.
  - Two new settlement options are being promoted to the south of Dunchurch.
- 5.4.60 In conclusion, there are **two reasonable growth scenarios** for Dunchurch:
- 1) The proposed submission approach (nil allocations)
  - 2) Allocation of two sites for a total 210 homes

## Long Lawford

- 5.4.61 Long Lawford is located in the Green Belt near adjacent to the west of Rugby. There is a historic core to the north of the railway line at the western extent of the village (but just two listed buildings and no conservation area) and then the village has expanded east (towards Rugby) and also to the south of the railway line over recent decades, including significant growth over recent years. The village has a settlement score of 38, which is 'middling' amongst the main rural settlements but there is good primary school capacity.
- 5.4.62 Firstly, there is a new proposed urban allocation for 5 homes (**Site 172**).

5.4.63 With regards to greenfield sites, at the Draft Plan stage there was one proposed allocation, namely Land at Long Lawford (**Site 316**; 400 homes), which was identified as a somewhat marginal allocation such that it was explored as a variable across the RA growth scenarios. The Interim SA Report introduced the site as follows:

*“... four overlapping parcels of land have been considered, but the preferred configuration of growth is Site 316, which could deliver 400 homes. There would be the potential to deliver some targeted new community infrastructure, to include a small convenience shop and potentially land for a GP surgery, and it is understood that there is good potential to deliver a pedestrian crossing across the A428 and a high quality active travel link to the village centre via the site that is currently under construction near adjacent to the north. Rising topography to the south would assist with securing a degree of containment in Green Belt terms, but the situation is nonetheless challenging in this regard, noting that the site boundary does not align with field boundaries.”*

5.4.64 The latest situation is that the site will likely not deliver a GP surgery, but a new community space could be used for a pharmacy. Also, the latest situation is that there is understood to be a degree of heritage constraint given an adjacent listed farmstead.

5.4.65 The Interim SA Report then also gave close consideration to **Site 253**, which is located adjacent to the east of Site 316, but ultimately this site was ruled out, i.e. was not progressed to the RA growth scenarios. The Interim SA Report explained:

*“Site 253 to the east is then considered to perform less well for two reasons, namely: 1) Green Belt noting that this land is not likely to comprise Grey Belt on the basis of contributing to avoiding the sprawl of Rugby as a large built-up area; and 2) the site would not link as well to the village centre. However, it is recognised that the site has been promoted for just 150 homes, with extensive land made available for green / open space and a primary school (but there is no clear need for a new school here).*

*... With regards to comprehensive growth involving [Site 316 and Site 253], this is ruled out... on balance. There is no clear case for large-scale growth of this nature at Long Lawford although, on the other hand, it is recognised that allocation of Site 316 would likely increase pressure for additional allocation of Site 253 down the line.”*

5.4.66 At the current time the new proposed approach is to allocate both Site 316 and Site 253, with a view to comprehensive rather than piecemeal growth and because growth detailed work since the Draft Plan stage has shown the option of growth here to perform well in transport and accessibility terms. In particular, there is good bus connectivity and development should be able to deliver enhanced walking and cycling connectivity into Rugby, including to the town centre and to a secondary school.

5.4.67 However, an issue is that the land is within the Green Belt and has mostly found not to comprise grey belt. As such, there is a need to test the option of nil growth at Long Lawford, as per the approach taken at the Draft Plan stage.

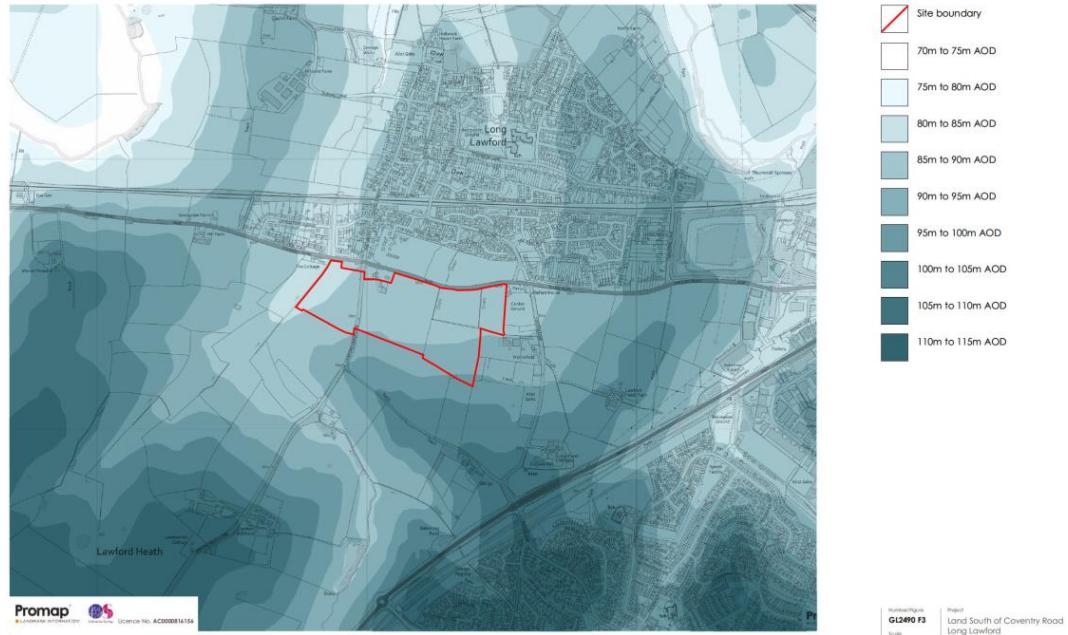
5.4.68 A further consideration is that Site 253 has also been promoted to deliver some employment land adjacent to the west of Rugby. This is an option to consider, with a view to comprehensive growth and potentially with a view to delivering on employment land objectives, but a key concern is impacting the Green Belt gap to Rugby. Figure 5.11 shows Site 316, recalling that Site 253 is adjacent to the east, and it can be seen that a modest scheme within Site 253 will benefit from topography providing a degree of containment, with raised ground to the east then maintaining a gap to Rugby.

5.4.69 There are no further omission sites of note and so, in conclusion, there are **two reasonable growth scenarios** for Long Lawford:<sup>21</sup>

1) One allocation for five homes

2) The proposed submission approach (three sites for a total of 655 homes)

<sup>21</sup> With regards to further omission sites, the Interim SA Report explained: *“Attention focuses on land to the south of the village, with no significant sites having been promoted as available to the north (and it is noted that there is a flood risk zone to the north west, whilst land to the north comprises a sensitive landscape associated with Holbrook Grange and the River Avon...)”*

**Figure 5.12: Site 316 and the context of topography in the Long Lawford area**

## Ryton-on-Dunsmore

5.4.70 The village is located on the A45 well-linked to Coventry and extensive employment land, plus further employment land in this area is an option at the current time (discussed below). The village including its historic character is heavily affected by the A45, although there is a prominent Grade II\* parish church.

5.4.71 At the Draft Plan stage there was one proposed allocation, namely Land at High St, Ryton-on-Dunsmore (**Site 100**; 37 homes) and this is unchanged at the current time. This was considered a strongly performing site at the Draft Plan stage such that allocation was a 'constant' across the RA growth scenarios. The Interim SA Report introduced the site as follows:

*"... designated as a Local Wildlife Site (LWS) but also an identified reserve site for housing in the made Ryton-on-Dunsmore Neighbourhood Plan (2021). Also, there is recent planning history, with an application recommended for approval but then refused at committee on the ground of car parking. The site is otherwise very suitable for development, given built form along three of its edges and woodland along the final edge, and is an emerging preferred option at the current time."*

5.4.72 At the current time it is considered a very strongly performing site in that it is identified as 'suitable' within the HELAA and, in turn, not discussed in the Site Assessment Topic Paper. It is once again progressed to the RA growth scenarios as a constant.

5.4.73 With regards to higher growth scenarios, there is limited strategic case given supply from allocations at the settlements discussed above, and another consideration is that Ryton-on-Dunsmore is located in proximity to Coventry such that Green Belt Purpose A is a consideration, i.e. there is potential for land around the village not to be grey belt.

5.4.74 However, there are some options to consider, with the Interim SA Report having explained matters as follows:

*"Attention focuses primarily on land to the south of the A45, but briefly north of the A45: **Site 71** to the west is being promoted for employment (given a location opposite Prologis Park); and it is difficult to envisage expansion to the east given a flood risk zone, a large LWS and the parish church. There is, however, the possibility of employment land to the east of Ryton / north of the A45..."*

*The other main non-committed site that has been promoted as available and is in contention for allocation is then Site 29 (63 homes) but achieving access would involve demolition of two homes. Also, there would be merit in considering this site in conjunction with land to the east, which has not been promoted as available, but which potentially represents the primary residential expansion option for the village. Across Site 29 and land to the east there appear to be several land ownership parcels.*

*Furthermore, as part of any residential expansion to the east there would be a need to consider the future of Site 305, which is located adjacent to the north and which comprises a Grade II listed Registered Park and Garden, namely Ryton House. The Grade II listed house is in ruin, and the grounds are in poor condition, such that the Registered Park and Garden is on the national Heritage at Risk Register and its vulnerability is classified as “high” (with a statement that its “future is uncertain”).*

*The site has previously been promoted as available, but it is not clear that it is currently actively being promoted for residential, with its current owner understood to be a scrap metal company. The made Neighbourhood Plan supports only heritage-led “sympathetic limited development”.*

5.4.75 The Interim SA Report went on to conclude the following regarding higher growth:

*“[The most significant] question is the possibility of strategic expansion to the southeast, including noting the possibility of heritage enhancement and strong landscape / Green Belt containment. This is not currently a reasonable option to explore, including given land availability, but is a potentially a matter for ongoing consideration (as part of which primary school capacity would need to factor-in, with it being the case that there is some existing headroom capacity, but seemingly no potential for expansion). It is also noted that the village currently has quite a low settlement score (36), such that growth aimed at delivering targeted new community infrastructure [might] be an option...”*

5.4.76 In conclusion, only **one reasonable growth scenario** is taken forward, namely the proposed submission approach of allocating one site for 37 homes.

## Stretton-on-Dunsmore

5.4.77 The village is located to the east of Ryton-on-Dunsmore, near equidistant between Coventry and Dunchurch, and benefits from having good access to the A45 but being slightly set back from the road. There is a conservation area at the southwest extent but also a wider area with historic character. Primary school capacity is an issue, as discussed in Section 5.2 (also as previously discussed in the Interim SA Report).

5.4.78 The current proposed approach is a modest evolution from the approach at the Draft Plan stage, with the new approach involving four allocations for 113 homes rather than four allocations for 168 homes. Specifically:

- Land E of Fosse Way, Stretton-on-Dunsmore (**Site 6**; 3 homes) – is unchanged.
- Land west of Fosse Way, Stretton-on-Dunsmore (**Site 81**; 40 homes) – is also unchanged; however, this decision was reached only having given detailed consideration to potential archaeological constraint. The Interim SA Report considered it to be a strongly performing site as: *“It relates well to the settlement edge, has the potential to be quite well-contained given a mature / historic field boundary, and the proposal is to deliver a significant new area of... greenspace.”* On the latter point, it can deliver 2.3 ha of greenspace within a 3.5 ha site.
- The Croft, Stretton-on-Dunsmore (**Site 348**; 70 homes) – this is a newly submitted site, and the proposal is now to allocate this site in place of **Site 134**, which is adjacent and was previously an allocation for 125 homes at the Draft Plan stage.

5.4.79 There is a clear logic to this new approach because Site 348 has better access than Site 348, which would be accessed from a lane with a rural character and would result in traffic passing through the village. However, ensuring a comprehensive approach to growth in this sector of the village warrants ongoing consideration. The Interim SA Report previously stated the following in respect of Site 134:

*“There is an adjacent existing permitted site, and, in this context, Site 134 should be able to deliver a well-rounded new settlement edge. However, there is a slight concern regarding further piecemeal expansion... [there is] a need to ensure that growth is... undertaken with a long term perspective, with a view to maximising opportunities to secure investment in infrastructure and the benefits of growth...”*

- 5.4.80 Other than Site 134, one other omission site of note is **Site 26** (34 homes), in respect of which the Interim SA Report explained: *“[It] arguably relates very well to the settlement edge (unless the aim were to be to retain / enhance a green wedge in this area, noting the proposal above regarding a new public open space within Site 81, two public rights of way and generally a high density of historic field boundaries in this area). However, an issue is that access would need to be achieved by crossing a small brook.”* The Site Assessment Topic Paper (2025) reinforces concerns: *“There are significant flow paths on the access road... including depths of 0.6 to 0.9m for 1 in 30- year events”.*
- 5.4.81 Overall, whilst there is a village-specific case for testing a higher growth scenario involving additional allocation of Site 134 (provisional grey belt is another factor), there is limited wider strategic case (given supply from allocations at other settlements discussed above), and there is also a need to consider the primary school constraint. In conclusion, only **one reasonable growth scenario** is taken forward, namely the proposed submission approach of allocating three sites for a total of 113 homes.

## Wolston

- 5.4.82 Wolston is a historic village closely associated with the Avon valley (along which there is a concentration of higher quality agricultural land). It is located to the east of Coventry, but unlike other villages in this area (Binley Woods, Ryton-on-Dunsmore and Stretton-on-Dunsmore) Wolston is not directly linked to an A-road. There is, however, a good local offer such that the village has a high settlement score (45).
- 5.4.83 The preferred approach at the Draft Plan stage involved just one small allocation, namely Dyers Lane, Wolston (**Site 39**; 15 homes), with the Interim SA Report stating: *“This is considered to be a strongly performing site, and it is also noted that there is the potential to bring the site forward as self-build housing or for older persons housing.”*
- 5.4.84 With regards to higher growth scenarios, the Interim SA Report explained: *“There are several site options that are potentially suitable for allocation when viewed in isolation, but the Interim a major issue affecting the village is primary school capacity. Specifically, there is no capacity at the school and likely no potential for expansion, such that directing growth to the village would mean that children need to travel to primary school at Ryton-on-Dunsmore or Binley Woods.”*
- 5.4.85 The situation is broadly unchanged, with modelling work undertaken subsequent to the Draft Plan stage (assuming allocation of Site 39) leading to the following conclusion (as set out in the Education Topic Paper, 2025): *“Wolston St Margaret CofE Primary School is not projected in the model to exceed capacity, but remains close to capacity... In both 2022-23 and 2023-24, 87% of children at the school were resident in Wolston and The Lawfords Ward. The priority area for the school lies entirely within the ward. This indicates that there is limited capacity for this school to accommodate children from new housing in Wolston by shrinking the area from which it admits children to focus on the priority area. This is further likely to be the case if there is ‘push back’ from Knightlow CoE Primary School due to new housing in Stretton-on-Dunsmore, as discussed above... This supports the advice received from Warwickshire County Council that there is very limited additional capacity for the children from new housing in Wolston to attend the village school.”*
- 5.4.86 However, there is now an additional proposed allocation, namely North of Warwick Rd, Wolston (**Site 136**; 80 homes). The Interim SA Report flagged this as “the next port of call” should the primary school issue be addressed, and otherwise the site is subject to limited constraint, albeit it would extend an already linear built form.

- 5.4.87 The site promoters submitted detailed analysis through the Draft Plan consultation questioning the primary school constraint, but latest situation is that the site will be delivered as specialist accommodation for those aged over 55 or shall *comprise bungalows with two or fewer bedrooms*. The implication is allocation generates limited or no additional pressure on the school; however, additional pressure placed on local GP services is potentially an issue, with the NHS Integrated Care Board stating:
- “Wolston – this practice is in a rural location, with very limited expansion opportunities... there is a suggestion that the housing could be specialist older persons housing which is a concern, noting the wider health and social care needs of these residents...”*
- 5.4.88 In conclusion, only **one reasonable growth scenario** is taken forward, namely the proposed submission approach of allocating two sites for a total of 95 homes.

## Wolvey

- 5.4.89 Wolvey is a notably small main rural settlement with a low settlement score (36) and is also notable on account of being located in the north of the Borough, linking much more strongly to Hinckley, Nuneaton and Coventry than to Rugby. It is a historic village associated with the River Anker, and there is a small conservation area, but the conservation area includes just one Grade II listed building, and the village as a whole contains just three listed buildings. The village is distant from an A-road, similar to Brinklow, although Brinklow is more constrained in historic environment terms.
- 5.4.90 At the Draft Plan stage Wolvey stood out as the village assigned strategic growth, including with the view to delivering on village-specific objectives (a primary school expansion, a neighbourhood hub and an improved bus service). Specifically, the proposal was to support strategic growth to the south of the village and also allocations to the west and north east. However, following consultation the significance of the village-specific growth opportunity is questionable. Also, within the Interim SA Report, there were some concerns raised with the option of expanding the village to the south east in terms of ensuring containment / minimising the risk of long term sprawl.
- 5.4.91 The new proposal is to support significant growth involving 210 homes from allocations rather than strategic growth involving 710 homes. Specifically:
- South – there is no longer support for strategic growth here, namely **Site 96** (500 homes), but a modest part of previously proposed Site 96 is retained and proposed for 60 homes (**Site 358**). The new proposed site relates well to the village built form but there is no southern boundary (i.e. the site comprises part of a wider field), such that there is potentially a risk of pressure for future sub-optimal development creep / piecemeal expansion with opportunities missed to achieve planning gain.
  - West – Land North of B4109, Wolvey (**Site 309**; 150 homes) is unchanged from the Draft Plan stage. The Interim SA Report explained: *“... this is arguably the best performing site because it is subject to limited constraint and is well-contained in landscape / Green Belt terms. However, the site would deliver limited benefits beyond new homes (river corridor enhancements should be explored).”*  
A further consideration is biodiversity constraint highlighted by the Wildlife Trust through consultation in 2025, but the Ecological Assessment flagged few concerns. It is noted that whilst the site is being promoted for 190 homes the proposed allocation is for 150 homes, which could suggest some additional opportunity for green and/or blue infrastructure. This is a matter for further consideration, noting that the concept masterplan submitted by the site promoter shows very little land for green blue infrastructure along the boundary with the river corridor.
  - North east – **Site 84** was previously proposed for 60 homes but is now deleted for a relatively clear cut reason. Specifically, whilst there is a direct walking route linking to the village centre this is via a river corridor such that it cannot be considered a year-round walking route. The Interim SA Report explained:

*“The next-best site [after Site 309] is then potentially Site 84 to the northeast (60 homes). There is a very strong proposal to develop only a small proportion of this site, with the bulk of the site delivered as an area of riverside parkland and a play area, and the village would certainly benefit... However the housing area would deliver a ‘phase 2’ of a scheme currently under construction (such that the question arises as to whether even greater benefits to the village could have been secured if the two phases had been planned for comprehensively), does not relate well to the settlement edge and would not be well-contained in landscape / Green Belt terms.”*

- 5.4.92 Overall, the new proposed lower growth approach is supported, given the context of a reduced need to identify greenfield allocations, and given the greenfield options discussed above, including at Long Lawford where there is a much stronger case to be made for growth in transport and accessibility terms. Without a clear village-specific growth opportunity the case for strategic growth at Wolvey reduces considerably. Also, the Water Cycle Study (WCS, 2025) discusses a water supply constraint at the village.
- 5.4.93 The Interim SA Report did flag the proposal for strategic growth to the south of Wolvey as questionable, such that it was a variable across the RA growth scenarios, albeit there was also support for the scheme in some respects, for example with the report stating: *“The site is not very well-contained... but as a large site there should be good potential to work with land-owners on site masterplanning to ensure a comprehensive scheme.”*
- 5.4.94 With regards to possible higher growth scenarios, the village built form suggests limited further opportunities; however, the Interim SA Report discussed two modest options.<sup>22</sup>
- 5.4.95 In conclusion, only **one reasonable growth scenario** is taken forward, namely the proposed submission approach of allocating two sites for a total of 210 homes. Strategic growth to the south is now ruled out as unreasonable given strategic, village-specific and site-specific factors

## Rural villages

- 5.4.96 The proposed approach was (at the Draft Plan stage) and remains not to allocate at any of the rural villages other than Newton, which has been discussed above as something of an exception, in that it relates very closely to Rugby. Whilst Section 5.4 of the Interim SA Report briefly considered the possibility of one or more allocations at a rural village the broad strategic case is now reduced, and it is equally the case that consultation and subsequent evidence gathering has not served to highlight any village-specific growth opportunities that are significant enough to potentially warrant an allocation.
- 5.4.97 The equivalent text from the Interim SA Report is represented here:
- “The limited strategic case for allocation at rural villages has already been introduced in Section 5.2, and this limited strategic case is now even clearer after having considered supply options at higher order settlements here within Section 5.4.*
- However, it is recognised that: A) certain rural villages have a higher settlement score than others; B) certain villages may be associated with a strategic case for modest growth to meet localised housing needs, deliver targeted infrastructure and/or to generally help to maintain village vitality; and C) there are a number of available site options that are suitable when viewed in isolation, i.e. blind to the strategic context.*
- Overall, attention focuses on:*
- *Church Lawford – is located on the A428 and has limited historic environment sensitivity. There are three available site options and the southern two appear reasonably unconstrained and well-linked.*

<sup>22</sup> *“Firstly, Site 107 (10 homes) is peripheral to the village (but close to Site 84) and may have some sensitivity a location at the junction of two historic roads (see historic mapping, which also suggests potential archaeological sensitivity), noting dense field boundaries and given the nearby river corridor. Secondly, Site 104 (~15 homes) would involve demolition of a house to achieve access but might alternatively be considered as part of a comprehensive scheme linked to Site 96.”*

- *Shilton – there is the potential for significant growth to the north of the village at Site 56 (e.g. increasing the size of the village by 50% or more), but there is no clear strategic case for this. A small scheme could be delivered within Site 56 (namely Site 313) but then there would be a risk of further piecemeal growth over time with opportunities missed to secure benefits to the village.*
- *Birdingbury – a notably rural village in the south of the Borough. Site 116 appears to be notably unconstrained and well linked to the village / well contained...*

*Overall, whilst there are options warranting further ongoing consideration there is no clear reasonable growth scenario involving allocation at any of the rural villages at the current time. There will be the potential to add one or more rural village allocations prior to plan finalisation should this be deemed appropriate in light of consultation responses received, including from parish councils.”*

## New settlement options

- 5.4.98 The primary new settlement option is Lodge Farm (**Site 73**), which has already been introduced above. To recap, whilst it was an omission site at the Draft Plan stage it was explored as a variable across the RA growth scenarios.
- 5.4.99 There is also a planning history going back further, in that the site was an allocation in the adopted Local Plan until it was removed by the Inspector, whose report explained:
- “In conclusion, the allocation would have relatively poor accessibility, particularly by non-car modes and in comparison with the other large scale allocations in the Plan. It would also be likely to have significant adverse effects on the landscape, again to a greater degree than is likely with the other allocations of comparable size, and cause less than substantial harm to the significance of heritage assets. Notwithstanding the justification set out in the Plan and the supporting evidence, there is not currently a need for this allocation to meet the Plan’s housing requirements. Indeed without it the Plan provides for an excess of housing land supply over the identified requirement of more than 17%. In the light of this, I find that the harm likely to be caused by development... would not be outweighed by the benefits.”*
- 5.4.100 The Inspector’s Report also says much more besides, and the great majority of the concerns raised remain entirely applicable at the current time. However, understanding has moved on regarding some of the matters discussed, in particular regarding infrastructure delivery opportunities and also bus service opportunities. It should also be noted that matters did not transpire as anticipated in the following regard:
- “In terms of its contribution to the borough’s infrastructure requirements, I understand that the Lodge Farm development could [make] a contribution to the costs of the proposed new secondary school and spine road at South West Rugby. However... the SWR development on its own would be viably able to deliver the full strategic transport and education requirements necessary to support that development, including the spine road network and Homestead Link around Dunchurch. Therefore, the Lodge Farm allocation is not needed to support of the infrastructure requirements of the borough.”*
- 5.4.101 The Interim SA Report introduced Lodge Farm as follows:
- “Whilst the Inspectors Report for the adopted Local Plan (2019) raised a wide range of issues, it is acknowledged that the site promoter has subsequently undertaken work to explore ways to address issues / better realise opportunities and, as part of this, is now proposing a considerably larger / more comprehensive scheme.... [which] could deliver a secondary school, although a new school at this location [has limited strategic rationale]. Also, a larger scheme would assist with securing a high quality bus service between Rugby (SW Rugby SUE) and Daventry via Lodge Farm and Dunchurch, which is an important consideration, although major concerns would still remain regarding how to avoid problematic traffic through Dunchurch.”*

- 5.4.102 A new vision document was then received from the site promoters in May 2025, and a headline is a proposal to bill Lodge Farm as: “Rugby Borough’s new infrastructure led community”. However, the issue is development viability, as has already been discussed above in Section 5.2, with the headline conclusion being that “*Lodge Farm is a long way from being a viable proposition even at 0% affordable housing.*” It is recognised that this calculation is on the basis of key assumptions regarding delivery of a bypass as part of any new village (rather than the A45 passing through the centre of the village), at a cost of £30m, and contributing £61m for a significant upgrade to the Thurlaston interchange (likely comprising grade separation); however, these are considered reasonable assumptions. Nationally local plans have faced major issues due to uncertainties regarding infrastructure upgrades to support new settlements.
- 5.4.103 There is a need to avoid the mistakes of the past in respect of strategic allocations with viability challenges that impact delivery and/or the ability to deliver affordable housing (and/or ability to deliver in line with the original vision including in infrastructure terms). This suggests the potential to now rule out Lodge Farm as unreasonable. However, on the other hand, there is a case for continuing to test the option of a new settlement, as an alternative to urban extensions and/or with a view to delivering higher growth.
- 5.4.104 As part of this, the benefits of what will be achieved by South West Rugby are recognised, for example a new secondary school and a comprehensive spine road network. Also, it is acknowledged that the County is supportive of options for concentrating growth, with the Draft Plan consultation response for example stating:
- *“We believe that the dispersal method is contrary to The Borough Council’s objective... to “deliver infrastructure led growth”. It is of significant risk that either the current infrastructure is not sufficient to meet new dispersed development, nor can sufficient mitigation funding be raised [to] fully fund new infrastructure.”*
  - *“The dispersal strategy is not supportive of active travel and will require an increase in trips from villages to larger urban centres.”*
  - *“Primary age pupils may be able to walk to a local primary school but the dispersal strategy would see a significant increase in the number of secondary age school pupils who need to be transported to secondary provision. This will result in a significant increase to the County Council for home to school transport costs.”*
  - *“Post 16 Education/training/employment- transportation from rural locations is limited (Home to school transport not available for post 16).”*
  - *Feedback from Commissioners across Children’s and Adult Social Care Services, Social Work teams, and colleagues in the Integrated Care Board, is that the proposed dispersal strategy may add further burdens in areas with already existing challenges. The proposals for example in Wolvey... could lead a requirement to develop 175 social rent homes in that area... some of the 175 residents will be accessing social care services or early help prevention. However, there is limited care infrastructure within that area and due to the rural nature of the location...”*
  - *“... The County Council’s preference is for larger standalone developments – these would deliver primary and secondary education solutions in one place, i.e. Lodge Farm or Cosford. Cosford is close to the existing settlement of Rugby so initial services could be provided reasonably closely until such time as development supports the provision of new infrastructure. Lodge Farm might provide new infrastructure that would benefit not only the development but also Dunchurch and the smaller surrounding villages.*
- 5.4.105 On balance it is still considered reasonable to progress Lodge Farm to the RA growth scenarios, as per the approach at the Draft Plan stage, but the case for doing so has undoubtedly reduced considerably, which is a matter discussed further in Section 5.5.
- 5.4.106 Finally, it is noted that there are two very large sites to the north of Lodge Farm (i.e. south of Rugby in the vicinity of Dunchurch) that have been made available, but which are not being actively promoted to anything like the same extent as Lodge Farm, namely **Site 22** and **Site 91**. The Interim SA Report explained:

*“[Site 91] has already been briefly discussed above, and is considered to perform poorly, including noting that this is the sensitive Rains Brook Valley, given nearby SW Rugby SUE and also noting higher quality agricultural land. With regards to Site 22, which is near adjacent to Lodge Farm, there is little reason to suggest that it is a preferable location to Lodge Farm at the current time (and, again, there is a need to give some weight to the fact that Lodge Farm has been a focus of promotion and work over recent years); however, it does perhaps warrant ongoing consideration as a comparator to Lodge Farm, plus its availability serves to highlight potential concerns regarding containment of growth / a risk of sprawl over time. Site 22 does have the benefit of linking to Dunchurch, the Rains Brook Valley could perhaps assist with landscape containment and nearby Draycote Water is a ‘plus’; however, Lodge Farm would have the benefit of [linking] to both Daventry and Rugby.”*

- 5.4.107 A consultation response was received from the promoters of Site 22 suggesting that the site performs better than Lodge Farm as a new settlement option, but there was limited supporting evidence. Whilst Site 22 is closer to the Dunchurch and Rugby relative to Lodge Farm, it is equally closer to the South West Rugby committed growth area. Also, a key consideration is that evidence shows Site 22 and Site 91 to be the most constrained growth options in the Borough in landscape terms (Figure 5.5, above).
- 5.4.108 There is little or no strategic case to be made for proactively exploring new settlement options over-and-above what has been promoted to the Council.<sup>23</sup>

## Conclusion on settlement scenarios

- 5.4.109 This section has considered housing growth scenarios for each of the Borough’s key settlements. To reiterate, this section has not considered growth scenarios in respect of employment land or providing for Gypsy and Traveller accommodation needs, because a conclusion on growth scenarios for these matters is reached in Section 5.2.
- 5.4.110 Table 5.1 summarises the conclusions reached above.
- 5.4.111 It is important to be clear that a number of the conclusions on settlement scenarios are reached ‘on balance’. For example, whilst at Stretton-on-Dunsmore there does remain an important choice, but the choice is of limited strategic importance such that it does not warrant being explored further via appraisal of growth scenarios “on balance”.
- 5.4.112 Equally, it is important to be clear that a conclusion of “only one reasonable growth scenario” should not be taken to mean that the proposed submission approach is a fait accompli (i.e. there does remain the potential to question the proposed submission approach for all settlements through representations at the current time and through the subsequent Examination in Public).
- 5.4.113 The aim of the exercise above, the outcomes of which are summarised in Table 5.1, is to arrive at a discrete (manageable) number of key strategic settlement-specific choices that can then feed into work to define borough-wide RA growth scenarios in Section 5.5.

<sup>23</sup> Attention focuses on land linked to a train station and, in this regard, attention might focus on land to the south of the anticipated Rugby Parkway Station at Houlton. However, land here is primarily within West Northamptonshire and, in any case, there are constraints in the form of two railway lines and quite extensive flood zones, plus the village of Kilby to the south is notably sensitive in historic environment terms. The only other feasible locations of note are in the far north of the Borough, namely: A) a cluster of sites to the south / southwest of Hinckley (including **Site 321**); and B) a cluster of sites to the south / southeast of Hinckley adjacent or near to M69 J1 (including **Site 94**). However, there is little in the way of active promotion (of a new settlement), there are constraints to growth in this area (as discussed), there is a need to consider employment land as an alternative potential land use and there is limited or no clear strategic case for a new settlement in this area, including noting that any new settlement would link to Hinckley / Leicester, and there is currently no strategic steer regarding the need for growth in this area (as discussed).

**Table 5.1: Summary of settlement-specific housing growth scenarios**

Settlement	Growth scenarios
Rugby	<b>Four growth scenarios</b> namely: 1) the proposed submission approach (18 allocations for 1,258 homes); 2) Scenario 1 plus the two Hillmorton sites (1,533 homes in total); 3) Scenario 1 plus the North West Rugby (2,458 homes in total); and 4) Scenario 1 plus the two Hillmorton sites and NW Rugby (2,733 homes in total).
Binley Woods	One growth, namely allocation of one site for 43 homes.
Brinklow	One growth, namely allocation of two sites for a total of 325 homes.
Clifton-upon-Dunsmore	One growth, namely allocation of three sites for a total of 150 homes.
Dunchurch	<b>Two growth scenarios</b> namely: 1) the proposed submission approach (nil allocations); and 2) allocation of two sites for a total of 210 homes.
Long Lawford	<b>Two growth scenarios</b> namely: 1) one allocation for five homes; 2) the proposed submission approach (two sites for a total of 655 homes).
Ryton-on-Dunsmore	One growth, namely allocation of one site for 37 homes.
Stretton-on-Dunsmore	One growth, namely allocation of three sites for a total of 113 homes.
Wolston	One growth, namely allocation of two sites for a total of 95 homes.
Wolvey	One growth, namely allocation of two sites for a total of 210 homes.
Smaller villages	One growth, namely nil allocations.
New settlement	<b>Two growth scenarios</b> namely: 1) the proposed submission approach (nil allocations); and 2) allocation of Lodge Farm (1,200 homes in the plan period).

## 5.5 Reasonable growth scenarios

5.5.1 Beginning with growth scenarios in respect of employment land and providing for Gypsy and Traveller accommodation needs, to reiterate a conclusion on growth scenarios for these matters is reached in Section 5.2, namely:

- Employment land – four growth scenarios (set out above at paragraph 5.2.37 and also summarised below in Section 6.3)
- Gypsies and Travellers – only one growth scenario namely the proposed submission approach.

5.5.2 Focusing on growth scenarios for housing, the task here is to combine the settlement scenarios summarised in Table 5.1.

5.5.3 More specifically, whilst the scenarios in Table 5.1 are in respect of supply from new allocations, there is a need to combine these scenarios also accounting for:

- supply from commitments (7,993 homes);
- further supply on the basis of a windfall allowance (850 homes); and
- a need for any resulting borough-wide growth scenario to be ‘reasonable’ in light of the discussion of growth quanta and spatial strategy considerations presented in Section 5.2 and the plan objectives discussed in Section 2.

- 5.5.4 **Growth Scenario 1** is the proposed submission approach, which involves a total supply of 11,729 homes, such that there would be a supply buffer of 8.5% on top of the housing requirement, assuming that the requirement is set at LHN (10,812 homes).
- 5.5.5 There is no need to define lower growth scenarios (as discussed in Section 5.2), and so the next port of call is a scenario involving low growth at Long Lawford compensated for by support for higher growth to the south of Rugby (outside the Green Belt) and specifically support for Scenario 2 at Rugby and Scenario 2 at Dunchurch. Total supply is 11,564 homes, such that there would be a supply buffer of 7% on top of the housing requirement, assuming that the requirement is set at LHN. This is **Growth Scenario 2**.
- 5.5.6 The next port of call is then a similar scenario except that lower growth at Long Lawford is compensated for by support for allocation of North West Rugby, i.e. Scenario 3 at Rugby. Total supply is 12,279 homes, such that there would be a 13.5% supply buffer assuming that the requirement is set at LHN. This is **Growth Scenario 3**.
- 5.5.7 The next logical scenario then sees lower growth at Long Lawford compensated for by support for both higher growth to the south of Rugby (including Dunchurch) and a strategic allocation at North West Rugby. Total supply is 12,759 homes, such that there would be a 18% supply buffer assuming a requirement set at LHN. However, there is potentially no need for a supply buffer of this size such that the housing requirement might be set at a figure modestly above LHN. This is **Growth Scenario 4**.
- 5.5.8 The final scenarios then involve the proposed submission approach plus one or more omission sites, specifically:
- **Growth Scenario 5** – involves the proposed submission approach plus the additional sites to the south of Rugby (including Dunchurch). Assuming that the housing requirement is set at LHN then the supply buffer would be 13%. However, there is potentially no need for a supply buffer of this size such that the housing requirement could feasibly be set at a figure very modestly above LHN.
  - **Growth Scenario 6** – involves the proposed submission approach plus North West Rugby. Assuming that the housing requirement is set at LHN then the supply buffer would be 19.5%, which would amount to a high supply buffer although, on the other hand, delivery risks would serve as a reason for supporting a large supply buffer.
  - **Growth Scenario 7** – involves the proposed submission approach plus the additional sites to the south of Rugby (including Dunchurch) and North West Rugby. Assuming that the housing requirement is set at LHN then the supply buffer would be 24%, which would amount to a high supply buffer. As such, there would be potential for a higher housing requirement and/or an extended plan period.
  - **Growth Scenario 8** – involves the proposed submission approach plus the additional sites to the south of Rugby (including Dunchurch) and Lodge Farm. Assuming that the housing requirement is set at LHN then the supply buffer would be 24%, which would amount to a high supply buffer. As such, there would be potential for a higher housing requirement and/or an extended plan period. However, on the other hand, Lodge Farm has high delivery risk suggestive of the need for a large supply buffer.
- 5.5.9 Finally, it is important to be clear that the decision to include Lodge Farm in the RA growth scenarios at the current time is marginal, i.e. the assumption is that it would only be allocated, if necessary, after having exhausted other preferable supply options.<sup>24</sup>

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<sup>24</sup> The consultation response received from the Lodge Farm site promoters in 2025 questions the broad approach to reasonable alternatives, namely a focus on growth scenarios defined as alternative packages of site allocations where each is 'reasonable' in terms of providing for development needs alongside delivering on wider plan objectives. They state: "*Such an approach would also contradict virtually every other local plan that has ever been adopted... If not remedied, the whole basis of the SA in relation to site appraisal for potential residential allocations is fundamentally flawed and RPS would be making the reference throughout the Examination stage, with reference to very well-trodden Case Law.*" However, it is important to be clear that a focus on reasonable alternatives in the form of growth scenarios has been applied successfully for many years in the context of local plan SA. The reasons for focusing on RAs in the form of growth scenarios is set out in Section 4 of this report.

5.5.10 In summary, the housing RA growth scenarios are as follows:

- **Scenario 1** – the preferred option (PO)
- **Scenario 2** – the PO **minus** Long Lawford **plus** south of Rugby
- **Scenario 3** – the PO **minus** Long Lawford **plus** NW Rugby
- **Scenario 4** – the PO **minus** Long Lawford **plus** south of Rugby and NW Rugby
- **Scenario 5** – the PO **plus** south of Rugby
- **Scenario 6** – the PO **plus** NW Rugby
- **Scenario 7** – the PO **plus** south of Rugby and NW Rugby
- **Scenario 8** – the PO **plus** south of Rugby and Lodge Farm

**Table 5.2: The RA growth scenarios for housing (constants greyed-out)**

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 7
Commitments	7,993	7,993	7,993	7,993	7,993	7,993	7,993	7,993
Windfall	850	850	850	850	850	850	850	850
Rugby area*	<b>1,258</b>	<b>1,533</b>	<b>2,458</b>	<b>2,733</b>	<b>1,533</b>	<b>2,458</b>	<b>2,733</b>	<b>1,533</b>
Binley Woods	43	43	43	43	43	43	43	43
Brinklow	325	325	325	325	325	325	325	325
Clifton-U-D	150	150	150	150	150	150	150	150
Dunchurch	-	<b>210</b>	-	<b>210</b>	<b>210</b>	-	<b>210</b>	<b>210</b>
Long Lawford	<b>655</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>655</b>	<b>655</b>	<b>655</b>	<b>655</b>
Ryton-O-D	37	37	37	37	37	37	37	37
Stretton-O-D	113	113	113	113	113	113	113	113
Wolston	95	95	95	95	95	95	95	95
Wolvey	210	210	210	210	210	210	210	210
Lodge Farm	-	-	-	-	-	-	-	<b>1,200</b>
<b>Total homes</b>	<b>11,729</b>	<b>11,564</b>	<b>12,279</b>	<b>12,219</b>	<b>12,214</b>	<b>12,929</b>	<b>13,414</b>	<b>13,414</b>
<b>% above LHN</b>	<b>8%</b>	<b>7%</b>	<b>14%</b>	<b>13%</b>	<b>13%</b>	<b>20%</b>	<b>24%</b>	<b>24%</b>

\* Includes Houlton and Newton

## 6. Growth scenarios appraisal

### 6.1 Introduction

6.1.1 The aim here is to appraise the two sets of reasonable growth scenarios introduced above under the SA framework (Section 3). Specifically:

- Section 6.2 – presents an appraisal of the housing growth scenarios.
- Section 6.3 – presents an appraisal of the employment land growth scenarios.

#### Appraisal methodology

6.1.2 Under each sustainability topic the aim is to: 1) rank the scenarios in order of performance; and then 2) categorise the performance in terms of ‘significant effects’ using red / amber / light green / green.<sup>25</sup>

6.1.3 There is a need to draw upon wide ranging sources of evidence and make significant assumptions, e.g. around scheme masterplanning, infrastructure delivery, etc. Sources of evidence and assumptions are explained as appropriate, but there is also a need to balance explanation of evidence base and assumptions with a need for conciseness.

6.1.4 Another key assumption is in respect of the future baseline, i.e. the situation without an adopted plan with a robust land supply. Specifically, the assumption is that there would be a risk of sub-optimal growth under the presumption in favour of sustainable development. This is an important assumption, because a significant effect is, by definition, a significant effect *on the baseline*.

### 6.2 Housing growth scenarios appraisal

#### Introduction

6.2.1 The aim here is to appraise the five RA growth scenarios introduced in Section 5.5:

- **Scenario 1** – the preferred option (PO)
- **Scenario 2** – the PO **minus** Long Lawford **plus** south of Rugby
- **Scenario 3** – the PO **minus** Long Lawford **plus** NW Rugby
- **Scenario 4** – the PO **minus** Long Lawford **plus** south of Rugby and NW Rugby
- **Scenario 5** – the PO **plus** south of Rugby
- **Scenario 6** – the PO **plus** NW Rugby
- **Scenario 7** – the PO **plus** south of Rugby and NW Rugby
- **Scenario 8** – the PO **plus** south of Rugby and Lodge Farm

6.2.2 The appraisal is presented below under the SA framework, before a final section presents conclusions.

<sup>25</sup> **Red** indicates a significant negative effect; **amber** indicates a moderate or uncertain negative effect; **light green** indicates a moderate or uncertain positive effect; **green** indicates a significant positive effect; and **no colour** indicates a neutral effect.

## Accessibility (to community infrastructure)

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
1	3	4	3	2	5	5	6

6.2.3 A key issue here is directing growth to locations with good accessibility to community infrastructure (with capacity) and/or directing growth to sites able to deliver new or upgraded community infrastructure in order to meet the needs of the community and also potentially in order to address an existing capacity issue.

6.2.4 Taking the variable growth locations in turn:

- Long Lawford – there is existing primary school capacity to accommodate future growth, and the settlement is well connected to Rugby town centre and the nearest secondary school. There is understood to be good potential for growth to secure transport upgrades and also deliver some modest onsite community infrastructure.
- South of Rugby – the four sites in question are modest in scale and so would deliver limited benefits in terms of community infrastructure. However, the Hillmorton sites have good access to existing community infrastructure within Rugby; and Dunchurch has comfortably the highest settlement score across the Main Rural Settlements, such that there is a need to question low growth.
- North West Rugby – the site could deliver a secondary school but there is no clear strategic need for a new secondary school in Rugby (N.B. understanding has evolved since the Draft Plan stage, as discussed in Section 5) and this would potentially not be an ideal location for a new school, given access challenges.
- Lodge Farm – there is no strategic case for a new secondary school here and there is a need to recognise that a school could deliver late, given viability challenges, such that there is pressure on schools in Rugby in the interim period. Other than the matter of secondary school capacity, it is recognised that the proposal is to deliver a range of onsite community infrastructure; however, and as discussed, viability challenges could result in a need to accept compromises.

6.2.5 In **conclusion**, the proposed submission approach (Scenario 1) performs well, and there are few concerns with additional allocation of sites to the south of Rugby (but there would be a need to confirm that this would not lead to school capacity issues).<sup>26</sup> There is not support for those scenarios that see deletion the allocations at Long Lawford (Scenarios 2, 3 and 4), there are concerns with a high growth strategy for Rugby (including given potential viability and delivery challenges at NW Rugby) and there is a clear concern with allocation of Lodge Farm, for the reasons set out.

## Air quality

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
1	2	3	4	3	5	6	7

6.2.6 An Air Quality Management Area (AQMA) covers Rugby, Long Lawford, Clifton Upon Dunsmore and Dunchurch, which is quite unusual, and serves as an indication of the problematic traffic congestion that is experienced locally. In turn, there is a need to ensure a strong focus on minimising the need to travel, supporting modal shift away from the private car and avoiding problematic traffic congestion.

<sup>26</sup> The County Council's consultation response at the Draft Plan stage stated the following in respect of growth at Dunchurch: "Would not be able to accommodate total allocation at Dunchurch infant and Junior... Home to School Transport implications to other schools in Bilton Area. Could be a link with SW Rugby development and the schools but SW Rugby schools meeting their own demand." With regards to growth at Hillmorton, the consultation response stated: "Limited capacity at Secondary. Will require expansion of 3 existing schools or the provision of a new secondary school. Only capacity to expand at primary in the area might be English Martyrs Catholic Primary School. Possible that the proposed new primary school at Ashlawn Road could help support this growth but this has been designed to support Ashlawn Road and the wider South West Rugby..."

- 6.2.7 Given the AQMA issue it is appropriate to flag a concern with the two higher growth scenarios. In particular, there is a concern with Scenario 8, given limited potential to walk/cycle from Lodge Farm to key destinations and because of a concern regarding traffic through Dunchurch (discussed below), albeit there would be good potential to achieve a high quality bus service.
- 6.2.8 In **conclusion**, whilst it is appropriate to flag a concern with the higher growth scenarios given the AQMA issue, on balance only a ‘moderate or uncertain’ negative effect is predicted, recognising that air quality is generally improving over time and also noting that poor air quality is also an issue affecting both Coventry (where there is an area-wide AQMA) and Leicester (where there is a city centre AQMA). With regard to growth at Rugby, there is support for growth at Long Lawford over growth at either NW Rugby or across four sites to the south (Hillmorton and Dunchurch).

## Biodiversity

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
2	2	1	1	1	1	1	1

- 6.2.9 All of the variable growth locations are subject to limited biodiversity constraint, and this is also broadly the case for the sites that are allocated as a constant across all of the growth scenarios, recognising that detailed work to examine biodiversity issues and opportunities has fed in strongly to the site selection process (see Section 5.2).
- 6.2.10 Of the variable growth locations the primary constraint is potentially to the south of Long Lawford noting a stream corridor adjacent to the west that is a Local Wildlife Site (LWS). However, the LWS is not associated with any priority habitat and there is good potential to avoid impacts (and feasibly deliver some enhancement).
- 6.2.11 In **conclusion**, the proposed approach (Scenario 1) performs well, in light of work completed since the Draft Plan stage, and then it is appropriate to conclude that there is merit in higher growth scenarios, recognising that the effect of higher growth could feasibly be to relieve growth pressure elsewhere in the sub-region. For example, the broad landscape associated with the River Avon valley adjacent to Coventry is subject to relatively high constraint, and there is ancient woodland constraint east of Hinckley.

## Climate change adaptation

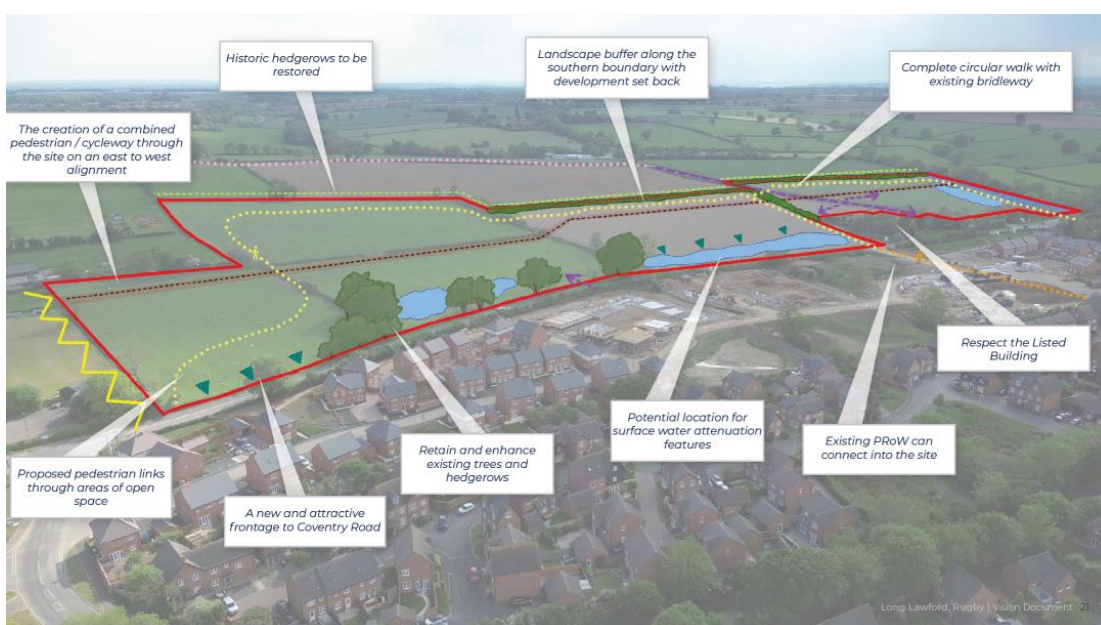
Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
=	=	=	=	=	=	=	

- 6.2.12 A key consideration here is flood risk, recognising that whilst this is an issue currently it is an issue that is set to get worse as a result of climate change.
- 6.2.13 None of the variable smaller sites are significantly constrained, i.e. intersect a flood risk zone to the extent that this will be a major constraint to masterplanning, such that there could be a need to accept compromises (feasibly even in respect of flood risk) or delivery could become challenging. However, there is a significant surface water flood channel along the A428 at the northern extent of Site 316 at Long Lawford. This has factored into concept / masterplanning work completed to date by the site promoter (Figure 6.1), but there will be a need for ongoing consideration. As part of this, there will also be a need to downstream properties at risk from flooding at Long Lawford.
- 6.2.14 Finally, with regards to the two variable strategic growth options:
- **NW Rugby** – much of the site is unconstrained in flood risk terms but there is a need to bridge the floodplain of the River Swift. There is also a need to consider that the Rugby urban area downhill / downstream is constrained by extensive flood risk zones associated with the River Avon. In turn, there could feasibly be the potential to explore opportunities around strategic flood water attenuation.

- Lodge Farm** – only intersects a fluvial flood risk zone at its northwestern extent but intersects a series of significant surface water flood risk zones. As a large strategic site there would be good potential to masterplan with flood risk in mind, clearly to include avoiding any sensitive development in a flood zone, and it could also be that flood risk zones provide structural framework around which to masterplan with a view to delivering a legible and high-quality new community. However, viability challenges that have a bearing on masterplanning.

6.2.15 In **conclusion**, whilst there is a case for flagging a concern with Lodge Farm, it is noted that the Environment Agency did not raise any concerns through the Draft Plan consultation (when Lodge Farm was an omission site but featured in the RA growth scenarios), hence the scenarios are now judged to perform on a par. With regards to significant effects, there is a need to also factor-in sites that are a constant across the growth scenarios, but overall, there are limited concerns (as discussed below, in Section 9) such that neutral effects are predicted across the scenarios.

**Figure 6.1: Site concept submitted by the promoter of Site 316**



## Climate change mitigation

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
=	=	=	=	=	=	=	=

- 6.2.16 The focus of discussion here is on minimising per capita greenhouse gas (GHG) emissions from the built environment, recognising that transport emissions (arguably a more significant consideration) can be a focus of discussion below under ‘Transport’.
- 6.2.17 It is inherently difficult to differentiate between site options and growth scenarios (i.e. combinations of site options) in terms of potential to minimise built environment emissions, which primarily means achieving standards of ‘operational’ built environment emissions over-and-above those required under the Building Regulations, although a further consideration is ‘embodied’ emissions, e.g. from the construction process.
- 6.2.18 As a general rule it can often be said that strategic site options give rise to an opportunity to achieve high standards – and potentially even to achievement of net zero development – over-and-above smaller sites, given: A) the potential to realise certain opportunities through masterplanning; B) economies of scale that can be supportive of development viability (such that there is potentially viability ‘headroom’ to allow funding to be directed to decarbonisation measures); and C) generally because strategic schemes are naturally a focus of scrutiny and might even be delivered as an exemplar.

- 6.2.19 However, in practice, the recent experience in the Borough has been that strategic sites have faced development viability challenges that have greatly constrained their ability to deliver affordable housing and so presumably (it has not been possible to review matters in detail) have also constrained their ability to deliver standards of built environment decarbonisation that go beyond minimum requirements.
- 6.2.20 In turn, a key consideration is directing growth to locations with strong development viability on the basis of there being a strong housing market and/or because the sites involved are not associated with abnormal development costs. Another consideration is ensuring a good geographical spread of sites, and, in this regard, it can be noted that a benefit of directing growth to Long Lawford is the relative distance to existing committed major growth locations at Houlton and SW Rugby. A final consideration is that development viability has been found to be particularly challenging at Lodge Farm.
- 6.2.21 In **conclusion**, there is a case for supporting the proposed submission approach; however, matters are highly uncertain and so, on balance, the scenarios are judged to perform broadly on a par.
- 6.2.22 With regards to significant effects, there is a need to factor in: A) sites that are a constant across the growth scenarios; and B) any local targets in respect of achieving 'net zero'. With regards to (A), most of the constant sites are relatively small, but there has generally been a focus on allocating sites with strong development viability and delivery credentials, e.g. there are few proposed allocations with existing uses on site that could impact viability / delivery. With regards to (B), whilst the Council as an organisation has committed to achieving net zero by 2030, there is no commitment to achieve net zero borough-wide ahead of 2050, which is the national net zero target date (in contrast to a number of neighbouring authorities, e.g. Hinckley and Bosworth Borough has committed to achieving net zero area-wide by 2030).
- 6.2.23 On balance it is considered appropriate to flag a 'moderate or uncertain' negative effect across the scenarios on the basis that climate change mitigation / decarbonisation is a national priority to the extent that it must feed in strongly to all key decision-making as part of preparing a Local Plan, which primarily means decision around spatial strategy / site selection (as opposed to placing a reliance on DM policies that risk not being fully implemented on viability grounds).

## Communities, health and wellbeing

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
2	2	1	2	2	2	2	2

- 6.2.24 This is a broad topic heading under which there is the potential to consider wide-ranging issues / opportunities over-and-above those discussed under the 'accessibility' and 'homes' topic headings.
- 6.2.25 A headline consideration is community concerns with growth at the variable sites located to the south of Rugby (Hillmorton and Dunchurch), with concerns at Hillmorton primarily relating to landscape sensitivities and concerns at Dunchurch primarily relating to the proximity of South West Rugby.
- 6.2.26 Further considerations are then: A) at Dunchurch there is a need to consider a risk of piecemeal growth to the west, as discussed in Section 5.4; at Hillmorton one of the sites is located adjacent to the Oxford Canal and the Canal and River Trust suggest this could represent an opportunity; and C) at certain of these sites there are also access challenges and/or challenges with achieving good walking / cycling connectivity.
- 6.2.27 Also, at Long Lawford, whilst limited concerns were raised through the Draft Plan consultation, at which time there was one proposed allocation for 400 homes, there is a need to consider whether the new proposed higher growth strategy (650 homes in total across two sites) may generate concerns.

- 6.2.28 This could feasibly be the case because these growth locations are set to deliver relatively little in terms of community infrastructure (they will deliver new open space, new convenience retail and space for a community use, e.g. a pharmacy). Also, the effect of the new proposed allocation will be to reduce separation with Rugby. However, growth is set to deliver transport infrastructure, including a new walking and cycling route to Bilton. The context at Long Lawford is that there has been considerable recent growth, and another consideration is that a new community to the south of the village will be somewhat separated from the existing village on account of the intervening A428.
- 6.2.29 Finally, with regards to the two variable strategic growth options:
- **NW Rugby** – achieving good access is challenging and there is generally a concern regarding the potential for a new community to link effectively to Rugby given the intervening industrial area, the River Swift corridor and the Oxford Canal corridor. However, there are relatively few concerns regarding impacts to nearby communities; indeed, adjacent Newbold on Avon area experiences relative deprivation, such that there could be the potential to deliver benefits to the area.
  - **Lodge Farm** – has been discussed for a number of years and has generated significant opposition among rural residents and those of Dunchurch. There would be a significant landscape gap to the rural village of Willoughby to the south, and this would be retained in perpetuity given flood risk zones. The main concern is likely around impacts to Dunchurch, particularly in terms of traffic, as discussed further below. Otherwise, and has been discussed, there could be the potential to deliver a high-quality new settlement, albeit the site straddles the A45 leading to severance (the Council has argued for the need for a bypass) and there would be a range of major infrastructure and wider costs with implications for development viability and, in turn, likely a need to accept compromises including potentially around community infrastructure delivery and masterplanning / place-making.
- 6.2.30 In **conclusion**, under this heading it is considered appropriate to flag support for directing growth to NW Rugby in place of growth at Long Lawford, Hillmorton and Dunchurch. There is also not support for higher growth scenarios.
- 6.2.31 With regards to significant effects, and factoring-in allocations that are a constant across the growth scenarios, it is considered appropriate to conclude ‘moderate or uncertain’ positive effects across all the scenarios. It is clearly the case that the proposed submission approach been developed with local community interests as a foremost consideration (e.g. as reflected in changes made since the Draft Plan stage), and both NW Rugby and Lodge Farm overall likely represent an opportunity in terms of directing growth with a view to aligning with community, health and wellbeing objectives.

## Economy and employment

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
=	=	=	=	=	=	=	=

- 6.2.32 There is limited potential to comment here, recognising that employment land growth scenarios are given stand-alone consideration below, i.e. given that the current housing growth scenarios are appraised with minimal employment land supply assumptions.
- 6.2.33 The main consideration is around directing housing growth to locations well-connected to centres of employment and employment growth areas; however, it is difficult to reach strong conclusions, beyond highlighting that NW Rugby is better located in terms of accessing employment than Lodge Farm in this regard. However, Lodge Farm would have the benefit of being well-linked to a major centre of employment at SW Rugby, could be considered better linked to Coventry, and would be well-linked to Daventry.
- 6.2.34 Finally, with regards to Lodge Farm a concern was raised through consultation is in respect of impacts to Dunchurch Pools (Marina), which is a key inland boating tourism facility for the Borough. There would appear to be good potential to mitigate impacts through masterplanning, but equally there are masterplanning uncertainties.

6.2.35 In **conclusion**, it is not possible to differentiate between the growth scenarios with confidence and neutral effects are predicted.

**Figure 6.2:** Concept masterplan submitted by the Lodge Farm site promoter (2025)



### Historic environment

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>

6.2.36 This is a key factor with a bearing on spatial strategy / site selection in the Rugby context. Taking the variable growth locations in turn:

- Long Lawford – the proposed growth location was historically a rural area; however, there is a historic farm at the northern extent of Site 316, including a Grade II listed farmhouse. The farm is well-screened from the A428 but is prominent within a rural landscape on the approach to Long Lawford from the south along Lawton Heath Lane, which is potentially a popular walking / cycling route from Rugby (noting bridleways). The Site Assessment Topic Paper explains:

*“The site is located at the southern edge of Long Lawford, and envelopes Avon Lodge, a grade II listed 18th-century farmhouse. The asset is a good example of its type, and retains some associated historic working buildings. One is an L-plan 19th century working building located within the site that, while it appears to be heavily altered, may be of heritage interest, and a ‘curtilage listed’ structure. Further investigation would be required prior to, and to inform site redevelopment.*

*The site’s large agricultural fields contribute to the farmhouse’s setting, albeit to a somewhat diluted degree due to their 20th century amalgamation and character. The farmhouse’s visibility from its surroundings is limited by hedgerows and tree planting, but glimpses allude to its presence and architectural interest.*

*Potential impacts include the erosion of the farmhouse's rural setting through loss of the historic L-Plan range, the redevelopment of fields...*

*Mitigation can be achieved through: the considered layout of the redevelopment, to ensure the farmhouse remains singular and distinctive in its surroundings; creation of a pedestrian connection linking local public rights of way to improve public appreciation; providing a buffer to the farmstead; and potential retention and reuse of the historic L-plan working buildings should they be found to be of... interest."*

- South of Rugby – with regards to the two sites at Rugby, this area was historically the village of Hillmorton, which was subsumed into Rugby in the 20th century. Both sites are separated from the former high street to the north, which has a strong historic character (but is not designated as a conservation area), but it is noted that historic mapping shows a characteristic field pattern at Site 334. Meanwhile, Site 40 is adjacent to a historic farm to the south, including a Grade II listed farmhouse, and is also adjacent to the Oxford Canal, which is an important heritage asset albeit not designated as a conservation area within Rugby Borough.

With regards to the two sites at Dunchurch, whilst the village centre conservation area is a key asset, this is separated from the sites by more modern development. However, it is noted that there is a Grade II listed building to the south of the B4429 which could feasibly be impacted by development at both sites.

- NW Rugby – the site includes the shrunken village of Cosford, which is a scheduled monument and a significant constraint, noting public rights of way and given a likely need to achieve access to the site via a route in close proximity. Also, to the south of the site is the Oxford Canal and beyond that the historic core of Newbold on Avon, although the Grade I listed church is well set back.
- Lodge Farm – this is a historically very rural area with low onsite sensitivity; however, there is a significant concern regarding traffic impacts through the Dunchurch Conservation Area, which is a key asset within the Borough (noting the dense concentration of listed buildings) already under pressure as a result of nearby growth. There is also significant historic environment constraint to the east of Dunchurch which likely rules out the possibility of an eastern bypass.

6.2.37 In **conclusion**, it is very difficult to differentiate the alternatives because all of the variable options are subject to a degree of constraint. It could be suggested that growth at Long Lawford is preferable to growth at Dunchurch from a historic environment perspective, recognising that Dunchurch is a key area of historic environment / heritage sensitivity within the Borough, but this conclusion cannot be reached with any certainty, given the grade II listed farmhouse sensitivity at Long Lawford. As such, and on balance, it is considered appropriate to simply flag a concern with those scenarios that would involve the proposed submission approach plus additional allocations.

6.2.38 With regards to significant effects, there has been detailed work to consider how to avoid and mitigate historic environment impacts (see discussion in Section 5.2), but there would be a need for further work in this regard under Scenarios 5 to 8.

## Homes

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
3	4	4	2	2	2	1	2

6.2.39 Even the lowest growth scenarios perform well in that: A) there would be the potential to set the housing requirement at LHN; B) there would not be a need for a stepped housing requirement (i.e. the requirement would be set at LHN from the outset); C) there would be a good mix of sites with a view to minimising delivery risk; D) there would be a healthy supply buffer with a view to ensuring that the housing requirement is delivered year-on-year in practice; and E) there would be a strong focus on directing growth to sites / locations with strong development viability (albeit the new proposed approach of directing additional growth to urban sites can be questioned in this regard).

6.2.40 By way of context, it is important to be clear that distribution growth with a view to avoiding viability and delivery challenges is a very well established objective, for example with the Inspector’s Report for the adopted Local Plan explaining:

*“... since 2011 monitoring shows that a distribution focused so heavily on Rugby town has been unable to deliver housing at the rate necessary to achieve [the committed requirement]. That is notwithstanding the steps taken by the Council to accelerate the delivery of the existing SUEs. As a result the Council has not been able to maintain a deliverable 5 year housing land supply in recent years...”*

*... The Housing Delivery Study (2015) (HDS), commissioned by the Council to consider market capacity for housing delivery in and around Rugby, also concludes that continued reliance on a limited number of large SUEs on the edge of Rugby is unlikely to deliver housing at the rate necessary to support the increased housing target in the submitted Plan at 660 dpa. To this end, in order to increase delivery rates, the HDS recommends a broader mix of locations for new housing including a major growth location away from Rugby and developments in the smaller settlements of the borough.”*

6.2.41 It is difficult to suggest a case for directing growth to four sites to the south of Rugby rather than to a strategic growth location at Long Lawford, including because sites south of Rugby are in proximity to SW Rugby and Houlton. Also, from a ‘housing’ perspective, there is certainly not a case for directing growth to NW Rugby ahead of Long Lawford.

6.2.42 With regards to the higher growth scenarios, there cannot be said to be a case for supporting Lodge Farm on the assumption that it would not be able to deliver any affordable housing. However, there is a case for the other higher growth scenarios, which would deliver additional affordable housing to more fully provide for needs. In addition to affordable housing delivery, a further motivation for boosting the housing requirement is potentially allowing for some flexibility to provide for unmet needs and/or the plan period could be lengthened (e.g. South Warwickshire is planning to 2050).

6.2.43 In **conclusion**, the order of preference reflects total growth quantum but also the distribution / mix of sites. All of the scenarios perform well in housing terms, but the two scenarios that would replace growth at Long Lawford with growth either to the south of Rugby or at NW Rugby perform less well.

## Landscape and townscape

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
<u>1</u>	2	<u>1</u>	2	2	2	2	2

6.2.44 Taking the variable growth locations in turn:

- Long Lawford – this is not one of the more sensitive landscapes and rising topography to the south would assist with securing a degree of containment, but the situation is nonetheless challenging in this regard, noting that the site boundary does not align with field boundaries. There are some quite extensive views, and footpaths through this area link the village to Rugby. The effect of growth could be to risk Long Lawford merging with Rugby, but it is not clear that this is a major issue in landscape terms, providing there is not ongoing sprawl. The effect would be to retain Rugby’s strong focus on the River Avon corridor.
- South of Rugby – with regards to the two sites at Rugby, this is broadly a sensitive sector of land given the relationship between the edge of Rugby / Hillmorton and the Rains Brook valley / Oxford Canal to the south, beyond which is the raised ironstone landscape of Daventry Borough, including the historic ironstone edge villages of Barby and Kilsby. There is potential to define site boundaries aimed at securing containment and minimising landscape impacts, and there is some screening from important viewpoints, but a concern is ongoing piecemeal growth.

- NW Rugby – whilst topography (a high point in the western part of the site) could assist with achieving containment, there could nonetheless be a concern regarding achieving a defensible long term Green Belt boundary. The bulk of the site is subject to limited landscape sensitivity, given the adjacent industrial area (also noting associated power lines). However, several important public rights of way cross the site, and there is a need to consider impacts associated with achieving good access at the southern extent of the site (Oxford Canal) and the northern extent of the site (Swift Valley and Cosford).
- Lodge Farm – the Inspectors Report for the adopted Local Plan discussed landscape sensitivity in detail, and since that time the site boundary has been expanded. This is a distinctly rural area experienced via expansive views across a flat landscape from the A45. Public rights of way intersect the site which link the Oxford Canal to Willoughby and Grandborough. Detailed work has been completed which shows this to be more sensitive than NW Rugby. Also, a further concern is that the concept masterplan shows the proposed village centre at the eastern edge of the site, such that there could be pressure for further expand the site to the east, potentially leading to a risk of sprawl towards Willoughby. Submitted proposals show extensive green infrastructure around the edge of the site other than at the eastern edge adjacent to the village centre.

6.2.45 In **conclusion**, there is not support for growth at Hillmorton from a landscape perspective nor allocation of Lodge Farm. However, there is also broadly a case for taking a proactive approach to growth in Rugby recognising that landscape sensitivity at the sites in question is at most “medium”. Overall, a ‘moderate or uncertain’ negative effect is predicted for the worst performing scenarios.

## Resources

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
=	=	=	=	=	=	=	=

- 6.2.46 A key issue to focus on here is loss of best and most versatile (BMV) agricultural land, which the NPPF classifies as land that is of grade 1, 2 or 3a quality.
- 6.2.47 The nationally available low resolution / accuracy dataset indicates that there is a concentration of grade 2 quality land to the south of Rugby, whilst other variable sites are shown to intersect grade 3 quality land (which may or may not be MBV).
- 6.2.48 None of the sites have been surveyed in detail, which is particularly surprising for Lodge Farm, given how long and actively the site has been promoted for. However, on the basis of the nationally available dataset it seems likely that the site does not comprise BMV quality land, as there is a nearby area of grade 4 quality land (albeit an area associated with flood risk). At NW Rugby it is noted that land adjacent to the east has been surveyed in detail and been found to comprise grade 3a quality land (i.e. BMV).
- 6.2.49 One other consideration is sterilisation of minerals resources accounting for Minerals Safeguarding Areas (MSAs) in the Warwickshire Minerals Plan, but it is inherently difficult to conclude significant concerns, as minerals safeguarding is not absolute. It is noted that extensive MSAs cover both NW Rugby and Long Lawford.<sup>27</sup>

<sup>27</sup> The County Council stated the following regarding NW Rugby at the Draft Plan stage: “We would object to this site. The proposals cover three MSAs – Building Stone, Cement raw materials and Sand and Gravel and there are extensive resources. The northern part of the site was allocated for sand and gravel working in the 1995 Minerals Local Plan (PA3 Cosford) but not taken forward. We would object because it is a very large site, covers several minerals, has the potential for future working, could be linked to the A426 and J1 of the M6 and supply minerals to Rugby and Coventry and is near to the Northants and Leicestershire borders making it a strategic location. It could be a replacement for Shawell Quarry which lies on the A426/A5 junction and on the WCC/ LCC border. However, we could see a scenario where we could remove our objection and that would be if a programme of prior extraction took place (the project will take 10-15 years to be completed), the site include a strategic mineral store where minerals could be conserved for long term use and then used for both on site long term developments and also sale to the local market. It could have a small compound where on site processing with mobile plant could take place. We would need to see a detailed mineral assessment report based on site investigations.”

- 6.2.50 In **conclusion**, it is not possible to differentiate between the growth scenarios with any confidence. After having additionally accounted for constant site allocations, it is clear that the Local Plan will result in the loss of a quantum of BMV agricultural land that might be considered significant, but judging significance is inherently difficult (with a lack of guidance available on this topic). A final point to note is that the Borough is not obviously any more or less constrained than other neighbouring local authorities within the sub-region, such that this is not a factor in favour of lower or higher growth.

## Transport

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
1	2	2	3	4	5	6	7

- 6.2.51 Transport is a key issue for any Local Plan, and the Rugby Local Plan is no exception. There is a need to direct growth in line with accessibility objectives, to locations where there is good potential to reach key destinations by active or public transport, and away from traffic congestion hotspots (including because traffic is a barrier to active and public transport. Taking the variable options in turn:

- Long Lawford – detailed work since the Draft Plan stage has shown there to be a clear transport case for supporting strategic growth at Long Lawford, particularly as there is the potential to achieve good connectivity into Rugby.
- South of Rugby – with regards to the two Rugby sites, both sites perform reasonably well in transport terms, although there are detailed matters for ongoing consideration regarding securing good walking / cycling connectivity. With regards to the two Dunchurch sites, traffic congestion in this area is an issue and one of the sites in question is understood to be associated with challenging access.
- NW Rugby – achieving good access and walking / cycling connectivity would clearly be challenging, and there is also a need to consider the potential to secure high quality bus connectivity. Work has been completed since the Draft Plan stage that shows that the site could potentially deliver in line with transport objectives, but there would be major costs involved and hence likely a need to compromise on wider objectives, notably affordable housing. From the Site Selection Topic Paper:

*“The immediately surrounding road network has relatively low levels of congestion, but impact on the A426 is a significant issue...”*

*Access to the site is a concern, although parts score well for connectivity. Achieving access from Overview Way would require bridging the River Swift floodplain and skirting around the Cosford Scheduled Monument. Access from the south is potentially equally challenging requiring bridging the Newbold Tunnel and increasing traffic onto Main Street in Newbold on Avon. Although shown as a point of access on the indicative plans, Brownsover Road is unlikely to be suitable to be a principal vehicular point of access in view of the narrow and weak canal bridge. [work in the strategic transport assessment assumes a need to replace that canal bridge in order to bring forward this point of access]*

*The access challenges and need for significant new highways infrastructure raise viability concerns.”*

- Lodge Farm – this is clearly a rural location, with limited potential to reach key destinations by walking / cycling (beyond what can be delivered within the site). However, there is thought likely to be good potential to secure a new or enhanced bus service between Rugby and Daventry, which would benefit communities over-and-above the new community at Lodge Farm. A key issue though is the A426 / B4429 junction in the centre of Dunchurch, and it is difficult to envisage a solution, including likely no potential to deliver an eastern bypass to the village (given heritage constraints). As discussed, detailed work has been completed since the Draft Plan stage that serves to indicate that the necessary transport upgrades may well not be achievable without making the scheme unviable.

It is also important to recognise the context of nearby SW Rugby, where delivery has proved challenging including on account of transport infrastructure challenges. In turn, a better time to consider Lodge Farm could be in the future once new infrastructure to the south west of Rugby has delivered.

Finally, it is recognised that the site promoters submitted detailed information at the Draft Plan consultation stage, for example stating: *“This is a site which from a transport/mobility / policy perspective ticks all of the boxes, can create a step change in the approach to place/design and can bring widespread benefits to existing communities in terms of ‘Gold Star’ investment in public transport...”* However, the Council is of the view that there will be major viability challenges after having factored in the cost of major upgrades, including grade separation at the Thurlaston interchange (A45/M45 junction) and an A45 bypass of the new village.

6.2.52 In **conclusion**, the proposed submission approach is strongly supported in transport terms, including in light of the Strategic Transport Assessment (2025). There is not support for scenarios that replace Long Lawford, and there are clear concerns with higher growth scenarios (including noting proximity of NW Rugby and Long Lawford).

## Water

Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
=	=	=	=	=	=	=	=

6.2.53 Focusing on capacity at wastewater treatment works (WwTWs), which is a key issue, the Environment Agency comments as follows through the Draft Plan consultation:

*“... we have previously commented on the Level 1 Water Cycle Study (WCS) 2024)) and understand it considers headroom capacity at the existing wastewater treatment works (WwTW) in Warwickshire in consideration of allocations in adopted local plans, residential and employment commitments, recent completions and windfall allowance. This does not appear to include the new allocations being considered in the Local Plan.*

*Bearing in mind the new allocations do not appear to be included in the headroom capacity assessment in the Level 1 WCS and whilst we note the policy requirements in CL3, we recommend... further assessment at this stage to determine whether there is sufficient capacity or planned capacity in the receiving STW(s) to serve Rugby’s growth (in combination with growth proposed in neighbouring councils where applicable), without causing significant deterioration of receiving water bodies.*

*Where there is an identified constraint... you should demonstrate that there is a solution... This will require consultation with Severn Trent. The outcome of this may inform a ‘phasing’ policy... The evidence you produce should give a reasonable degree of certainty to all parties, helping demonstrate development is deliverable.”*

6.2.54 A Stage 2 WCS was then completed, which concludes in respect of WwTWs:

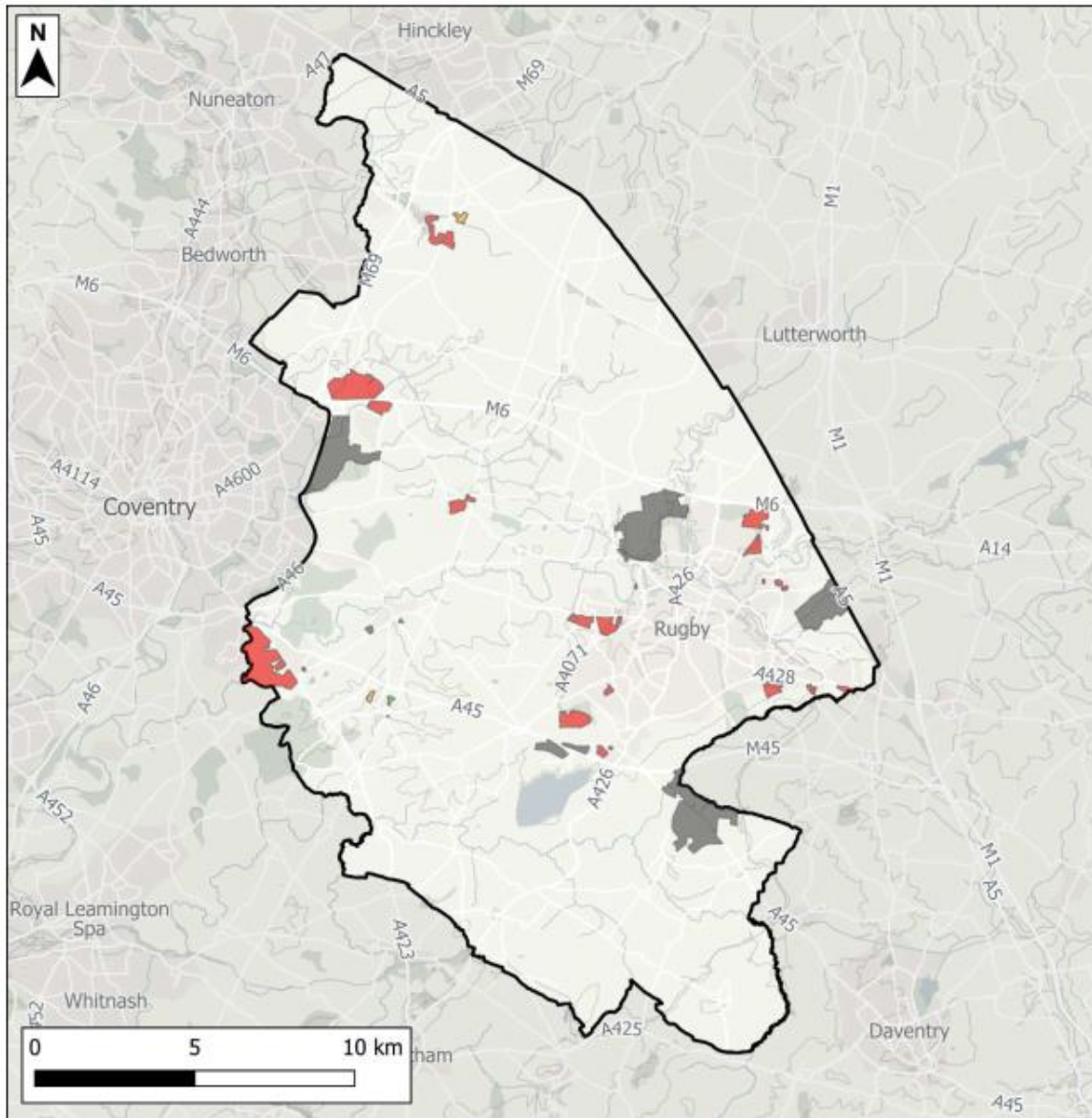
*“A capacity assessment was undertaken... comparing the future flow from each WwTW (the current actual flow and the forecast additional flow from growth), with the permit limit. This assessment was carried out for the full range of potential growth scenarios within Rugby. Six of the WwTWs serving growth in Rugby are expected to be close to or exceeding their permit during the Local Plan period. An increase in the permit limit, and / or upgrades to treatment capacity may [therefore] be required at these WwTWs...”*

*Severn Trent Water provide wastewater services for Rugby. Developments in areas where there is limited wastewater network capacity will increase pressure on the network, increasing the risk of a detrimental impact on existing customers, and increasing the likelihood of storm overflow operation... Early engagement between developers, RBC and the water companies is recommended to allow time for the strategic infrastructure required to serve these developments to be planned.”*

6.2.55 Figure 6.3 is taken from the Stage 2 WCS and shows the assessment of WwTW capacity as submitted by Severn Trent Water through the Draft Plan consultation. It can be seen that neither Lodge Farm nor NW Rugby was assessed.

6.2.56 In **conclusion**, from the Stage 2 WCS it is clear that securing wastewater treatment work capacity in support of growth is challenging locally, as it is in many areas, but there is no clear evidence to suggest any location or site specific issues or opportunities.

**Figure 6.3: Severn Trent Water WwTW capacity assessment**



**Figure: Severn Trent Water WwTW capacity assessment**

- Rugby Borough Council Boundary
- RBC Local Plan Allocations**
- Medium/High
- Medium
- Low
- Not assessed

Source: QGN-JBA-XX-XX-MX-EN-0001-50-P01.01-Figure\_Workspace  
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## Appraisal summary

- 6.2.57 The table (or 'matrix') below presents a summary of the appraisal presented above. Within each row, the aim is to **1**) rank the scenarios in order of performance (with a star indicating best performing); and then **2**) categorise performance in terms of significant effects using **red** (significant negative) / **amber** (moderate/uncertain negative) / **light green** (moderate/uncertain positive) / **green** (significant positive) / **no colour** (neutral).
- 6.2.58 **Scenario 1** is clearly shown to perform well. However, it is not necessarily the case that this is the best performing scenario overall, because the appraisal is not undertaken with any assumptions made regarding the degree of importance / weight that should be assigned to each of the topics (such that the intention is not that the matrix should be used to calculate a total score for each of the scenarios).
- 6.2.59 It is important to note that **Scenario 1** is not the best performing scenario under three of the topic headings (biodiversity, communities and homes), and the Council might choose to give particular weight to one or more of these topics when reaching a conclusion on which of the growth scenarios performs best overall.
- 6.2.60 The next key point to note is that **Scenario 7** is arguably shown to perform poorly overall although, once again, it is important to be clear that the aim of the appraisal is not to reach conclusions on the overall 'sustainability' of each of the scenarios. Also, it can be noted that numerous of the topic-specific appraisal conclusions are associated with a significant element of uncertainty, in that they are underpinned by assumptions.
- 6.2.61 It can also be noted that **Scenario 6** is arguably shown to perform relatively poorly, particularly accounting for the number of predicted negative effects (only Scenario 7 performs worse in this regard). However, it is shown to perform notably well under the 'homes' heading, and the Council might choose to give particular weight to this issue.
- 6.2.62 Finally, headline points to take from the appraisal include:
- Accessibility – there is supporting for directing growth to Long Lawford and there are concerns with higher growth at Rugby including given schools capacity. There are concerns with Lodge Farm given viability challenges.
  - Air quality – there are concerns with higher growth as this is a constraint locally.
  - Biodiversity – there are relatively few concerns given the sites in question.
  - Climate change mitigation – viability could impact delivery of net zero development.
  - Communities – there is tentative support for a focus of growth at NW Rugby.
  - Historic environment – widespread constraints lend support for lower growth.
  - Homes – there is a case for higher growth involving sites with stronger viability.
  - Landscape – there is not support for allocations at Hillmorton (south of Rugby).
  - Resources – loss of significant BMV agricultural land is likely under any scenario.
  - Transport – this is a key issue locally and there are concerns with higher growth. Growth at Long Lawford performs well and there is a need to support sites with stronger viability that can deliver or fund the necessary infrastructure upgrades.
  - Water – there are residual uncertainties around wastewater treatment capacity.

**Table 6.1: Housing growth scenarios appraisal summary**

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8
Accessibility	★ 1	3	4	3	2	5	5	6
Air quality	★ 1	2	3	4	3	5	6	7
Biodiversity	2	2	★ 1	★ 1	★ 1	★ 1	★ 1	★ 1
Climate change adaptation	=	=	=	=	=	=	=	=
Climate change mitigation	=	=	=	=	=	=	=	=
Communities, health & wellbeing	2	2	★ 1	2	2	2	2	2
Economy & employment	=	=	=	=	=	=	=	=
Historic environment	★ 1	★ 1	★ 1	★ 1	2	2	2	2
Homes	3	4	4	2	2	2	★ 1	2
Landscape & townscape	★ 1	2	★ 1	2	2	2	2	2
Resources	=	=	=	=	=	=	=	=
Transport	★ 1	2	2	3	4	5	6	7
Water	=	=	=	=	=	=	=	=

## 6.3 Employment land growth scenarios appraisal

### Introduction

6.3.1 The aim here is to appraise the four RA growth scenarios introduced in Section 5:

- Scenario 1 – the proposed submission approach (Figure 5.3 presented above)
- Scenario 2 – Scenario 1 but with Walsgrave Hill replaced by Prologis/Mountpark
- Scenario 3 – Scenario 1 but with Walsgrave Hill replaced by North of Houlton
- Scenario 4 – Scenario 1 but with Walsgrave Hill replaced by 2 sites at Thurlaston.

### Appraisal

6.3.2 A lighter touch approach to appraisal is taken relative to the approach taken above. Specifically, Table 6.2 presents a summary appraisal matrix, followed by a discussion.

**Table 6.2: Employment land growth scenarios appraisal**

Topic	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Accessibility	★1	★1	2	3
Air quality	=	=	=	=
Biodiversity	2	2	★1	★1
Climate change adaptation	=	=	=	=
Climate change mitigation	=	=	=	=
Communities, health & wellbeing	=	=	=	=
Economy & employment	2	★1	3	4
Historic environment	3	★1	2	2
Homes	=	=	=	=
Landscape & townscape	2	★1	★1	★1
Resources	=	=	=	=
Transport	★1	4	3	2
Water	=	=	=	=

6.3.3 As an initial point to note, there are several topic headings that are of limited relevance to this current appraisal and need not be discussed in detail. Focusing on key topics:

- **Accessibility** – three of the variable sites are associated with an opportunity to deliver significant new accessible greenspace, but the opportunity is most significant at Walsgrave Hill (a new country park linking to Coombe Abbey Country Park) and Prologis/Mountpark (a country park along the River Avon corridor).

- **Air quality** – both Coventry and Rugby are significantly constrained in terms of air quality, but it is difficult to differentiate between the scenarios with any certainty.
- **Biodiversity** – Walsgrave Hill is sensitive on account of proximity to Coombe Pool SSSI; however, there is good potential to avoid impacts through delivery of the aforementioned new country park. At both Prologis/Mountpark and North of Houlton there is an opportunity to deliver enhancements to a river / stream corridor. The opportunity is more significant at the Prologis/Mountpark, but equally the river corridor here is associated with more extensive biodiversity sensitivity.
- **Climate change adaptation** – three of the sites are quite strongly associated with river corridors; however, there should be good potential to avoid development in the flood risk zone. Having said this, it is not uncommon to accept some flood risk in the context of employment land such that, in turn, there is a need to consider the risk of employment land in a flood zone worsening downstream flood risk.
- **Communities, health and wellbeing** – elaborating on the matter of delivering new accessible greenspace (country parks), the opportunity is likely greater on the edge of Coventry in terms of benefiting existing communities. With regards to North of Houlton, whilst the country park opportunity is considered to be less significant, it is acknowledged that new employment land here could potentially compliment the new community at Houlton to the south, plus the employment land would be accessible from Rugby. At Rugby there is an existing issue of Houses in Multiple Occupation (HMOs), but it is difficult to suggest that this serves as a reason for limiting further growth in strategic logistics / warehousing. Finally, the Thurlaston sites perform less well as there is a concern regarding impacts to the delivery of SW Rugby. Also, these sites could be less well-suited to delivering Gypsy and Traveller pitches, which is a possibility indeed a proposal at the other sites.

Overall, there a number of competing considerations and it is difficult to reach an overall conclusion, hence the scenarios are judged to perform on a par.

- **Economy / employment** – there is a clear preference for directing new strategic employment land to the edge of Coventry, reflecting: A) the merits of locating employment land in proximity to Coventry itself; and B) the fact that east / south east Coventry is already a major hub for employment and research / development across key sectors, including relating to the [West Midlands Investment Zone](#). The implication of (B) is that new strategic land directed here will be well placed to deliver a mix of employment uses, likely to include an element of B8 but not overly dominated by B8. A final factor is then that Prologis/Mountpark is a larger site relative to Walsgrave Hill (after having factored in developable areas / proposed country parks) and there is a case for supporting higher growth (see Section 5.2).

Also, with regards to scale of growth, a key point to note is that the two Thurlaston sites in combination would deliver significantly less employment land than any of the other three variable sites, and the effect would be that the Local Plan would not be able to provide for: A) the regional need for strategic sites apportioned to area 7 to 2042 in full; or B) any unmet need for non-strategic sites from Coventry.

With regards to significant effects, there is also a need to account for the employment land allocations that are held constant across the growth scenarios (of which one is permitted and two are somewhat committed, leaving Ansty Park North as the sole allocation that is entirely uncommitted). Overall, the three higher growth scenarios would each amount to a proactive strategy, particularly as the effect would be to provide for regional needs in respect of strategic employment land, but there is a strong preference for the edge of Coventry sites.

- **Historic environment** – Walsgrave Hill contains grade II listed Walsgrave Hill Farmhouse and is adjacent to Combe Abbey grade II\* registered park and garden, which contains several listed buildings (grades I, II\* and II) and a scheduled monument. However, there is understood to be good potential to avoid and mitigate impacts. Also significant is the historic environment sensitivity in respect of North of Houlton, with Heritage Impact Assessment (HIA) finding there to be a significance constraint and limited potential for mitigation. It explains:

*“Development of the site risks harm to the setting of Dunsmore House [a Grade II listed late-19th century manor], through loss or erosion of its historic parkland, the key designed “set-piece” view, and/or the contributions of its wider rural setting. Views from and towards other non-designated heritage assets, including Dunsmore Hall Farm, Clifton Court, and Clifton Hall could be affected in a similar manner. Incongruous features could be introduced to views from the scheduled monument, creating further distractions to the panoramic viewpoint.”*

Finally, the Thurlaston sites are close to two conservation areas but there would be separation, and it may be possible to avoid HGVs routing through the historic centre of Dunchurch. As discussed, there is a need to carefully consider long term growth strategy for this area accounting for nearby South West Rugby.

In conclusion, there is a need to flag a concern with Walgrave Hill given the significance of the designated assets ahead of consultation on mitigation.

- **Landscape** – Walsgrave Hill (Scenario 1) has the highest landscape sensitivity (“medium”), but work has been completed that shows the potential for mitigation to reduce sensitivity to “medium / low”. North of Houlton is located outside of the Green Belt and has low landscape sensitivity. However, development would urbanise an otherwise quite rural landscape. Whilst there is some adjacent built form, and it would be possible to draw upon topography and Lilbourne Road for some containment, the possibility of ongoing ribbon development along the A5 can be envisaged. The Thurlaston sites risk eroding the landscape gap between Rugby and Thurlaston / Dunchurch, also noting residential wider employment options in this area. Finally, Prologis/Mountpark is quite well contained and adjacent Prologis Park and strategic road infrastructure act as major urbanising influences.
- **Resources** – focusing on agricultural land quality, from the nationally available low resolution dataset it seems that Prologis/Mountpark is least likely to comprise BMV agricultural land. Walsgrave Hill is the only site to have been surveyed in detail, with this finding the site to mostly comprise grade 3b quality land (non-BMV) but also to include some limited areas of grade 3a and grade 2 quality land.

Overall it is difficult to differentiate between the scenarios with confidence.

- **Transport** – there are well established concerns regarding Prologis/Mountpark in light of the Strategic Transport Assessment (2025), as discussed, whilst Walgrave Hill is comfortably the best performing site. From the Site Selection Topic Paper:

*“The site currently ranks moderately well for accessibility and is proximate to a future workforce in Coventry but there is potential create excellent access by active travel modes, in particular to the new residential area on the opposite site of the A46. It does not create the same degree of highways impacts as [Prologis/Mountpark] and its delivery is not contingent on delivery of uncommitted National Highways junction upgrades [North of Houlton]. It benefits from upcoming improvements on the A46 and has potential to be linked to Coventry’s Very Light Rail in the future, offering good non-car modes of access. The creation of a blue light route to the hospital is also a significant opportunity.”*

With regards to North of Houlton, whilst there would be potential to link to Houlton and a new Rugby Parkway station to the south, the site is distant from Coventry, and the Strategic Transport Assessment (2025) identifies significant queue impacts and development of the site would be dependent on improving the A5/A426 Gibbet junction, raising deliverability risks. Finally, at Sites 18/133 the concern is around in-combination impacts with committed growth at SW Rugby.

- 6.3.4 Overall, all of scenarios have pros and cons and it is for the Council to weigh these in the balance. It can be noted Scenario 4 arguably performs poorly overall, but this would be less the case if the two sites (or just one of them) were allocated *in addition* to Walsgrave Hill rather than in place of it. However, it should not be assumed that this would be the best performing *addition* to Walsgrave Hill, as other options could be considered including small sites (as referred to above), or reduced versions of other omission sites considered at Ryton-on-Dunsmore or North of Houlton, for example.

## 7. The preferred approach

### 7.1 Introduction

- 7.1.1 The aim here is to present the response of RBC officers to the two appraisals presented above and, in turn, to explain why the proposed submission approach is justified.

### 7.2 Housing

- 7.2.1 The appraisal shows the proposed submission approach (Scenario 1) to suitably well overall, albeit alternatives are shown to have merit in certain respects.
- 7.2.2 In terms of growth quantum, the proposed approach provides for local housing need (LHN) in full to 2042, and there are limited strong arguments to be made for higher growth. In particular, the appraisal shows there to be clear drawbacks to scenarios involving higher growth via support for a new large scale strategic site. In this respect the appraisal draws on and adds to the evidence provided in the Strategic Transport Assessment and Viability Study.
- 7.2.3 Officers would highlight the ongoing delivery of the strategic sites at South West Rugby and Houlton and Rugby's historically high rates of recent growth, together with high-level of public concern about infrastructure keeping pace with growth, as further strong arguments against high growth scenario.
- 7.2.4 The weak performance of the high growth scenarios also weakens the case for extending the plan period and supports the council's view that decisions about longer-term strategy for the mid 2040s and beyond are better taken by the successor unitary authority in the context of a strategic development strategy, the new plan-making system and new national policy.
- 7.2.5 The appraisal finds there to be limited case to be made for scenarios involving non-allocation at Long Lawford, which is helpful in terms of demonstrating that there are exceptional circumstances for Green Belt release here. The appraisal highlights that there is a case to be made for additional growth outside of the Green Belt to the south of Rugby, potentially with a view to not releasing Green Belt at Long Lawford, but there are also clear constraints to growth in this area, given the Rainsbrook Valley and proximity to the committed strategic urban extension at South West Rugby. This echoes public concerns about these options highlighted through the Regulation 18 consultation, and ties in with new evidence landscape evidence gathered since that consultation.

### 7.3 Employment land

- 7.3.1 Whilst the appraisal finds all of the scenarios to have pros and cons, the proposed submission approach (Scenario 1) is shown to perform most strongly in transport terms and is also shown to be one of the two best performing scenarios in terms of delivering on economy / employment land objectives. These are two key factors such that, overall, it is possible to conclude that Scenario 1 best represents sustainable development.
- 7.3.2 This supports the council's exceptional circumstances case. Overall, it is considered that Scenario 1 provides the greatest level of opportunities both in economic terms and for wider community benefits while raising fewer transport concerns than the alternative scenarios. In particular, the submission approach has potential to deliver sustainable transport to a large workforce that is superior to other scenarios.
- 7.3.3 A further consideration is the possible higher growth scenario involving Scenario 1 plus additional employment land allocated in the Thurlaston area (a scenario that is not formally appraised but is discussed above at para 6.3.4). However, this approach is not supported given the weak strategic case plus local sensitivities around: maintaining a settlement gap to Thurlaston and Dunchurch; the need to deliver and mitigate the impacts of South West Rugby; and the constraints on this part of the highway network.

## **Part 2: SA findings at this stage?**

## 8. Introducing Part 2

### 8.1 Overview

- 8.1.1 The aim here is to present an appraisal of the current Proposed Submission Local Plan.
- 8.1.2 In practice, the appraisal builds upon the appraisal of Scenario 1 in Section 6.2 (Housing growth scenarios appraisal) and Scenario 1 in Section 6.3 (Employment growth scenarios appraisal). Specifically, added consideration is given to:
- site allocations that are a 'constant' across the growth scenarios; and
  - thematic and site specific policies.

### 8.2 Introducing the plan

- 8.2.1 The plan document presents policies under the following headings: Strategy; Climate; Economy; Centres; Environment; Housing; Wellbeing; Design; Infrastructure.
- 8.2.2 A focus of the appraisal is naturally on the proposed 'strategy', because it is this aspect of the Local Plan that is associated with greatest potential to generate significant effects; however, consideration is also given to how other policies will serve to mitigate the impacts of growth and ensure that growth-related opportunities are realised.
- 8.2.3 The plan document presents the following overview of the strategy:

"This spatial strategy for development of homes and employment land in the borough in the period 2025-2042 is illustrated by the key diagram (below).

The housing requirement is set at local housing need calculated using the government's standard method. Of the requirement for 10,812 new homes (636 per year) 2025-2042, 7,993 (74%) already have planning permission or were allocated for development in the Local Plan 2011-2031. Of these, 7,279 will be delivered in three major expansions to Rugby at Houlton, South West Rugby and Eden Park.

New land allocations for 2,886 homes are made through this plan. Overall supply of 11,729 homes is identified against a housing requirement of 10,812, giving an 8.5% whole plan supply buffer to ensure the plan is effective.

New supply includes 698 homes within the Rugby urban area and 535 homes on further expansions to Rugby, which, as the only town within the borough, remains the focus for new housing, accommodating over 75% of new homes.

Allocations are made for 1,653 homes at the borough's rural settlements, including the main rural settlements of, Brinklow (325 homes), Binley Woods (43 homes adjacent to Binley Woods within Brandon & Bretford Parish), Clifton upon Dunsmore (150 homes), Ryton-on-Dunsmore (37 homes), Stretton-on-Dunsmore (113 homes), Wolston (95 homes), and Wolvey (210 homes). These villages mostly lie within the Green Belt and alterations to Green Belt boundaries are made. The main rural settlements provide the greatest range of rural services and new housing will support village sustainability.

To the south of the main rural settlement of Long Lawford, on Rugby town's western edge, a larger allocation of 650 homes is planned. This will sustain the village school, deliver new amenities and enhance walking, cycling and public transport links into Rugby.

Overall, the plan diversifies the location and size of housing sites, which were in previous local plans focussed on urban extensions to Rugby, to better reflect the borough's mix of town and rural locations. This will secure more affordable housing (delivery of which has historically been weak) due to higher house prices and stronger development viability in rural parts of the borough.

Rugby Borough's central location within the road and rail network drives strong demand for industrial and distribution land, much of it from inward investment.

The strategy for employment land will deliver 1,034,000m<sup>2</sup> of new industrial and warehousing floorspace 2025-2042 (approx. 287 hectares). Of this, 540,000m<sup>2</sup> (815,000m<sup>2</sup> if Crouner Fields Farm, which has planning permission is included) comprises new land allocations through this plan.

The strategy for employment land will deliver all of Rugby Borough’s assessed local industrial land need together with sub-regional large site requirement for Opportunity Area 7 (M6/A45/A46/M45 Coventry & Rugby) to 2042 as identified in the West Midlands

Strategic Employment Sites Study 2024 as updated through the Coventry & Warwickshire HEDNA – WMSESS Alignment Paper 2024 and subsequent 2025 addendum. Additionally, the identified employment supply allows a contribution of 2.5ha to be made to meeting Coventry’s unmet local need.

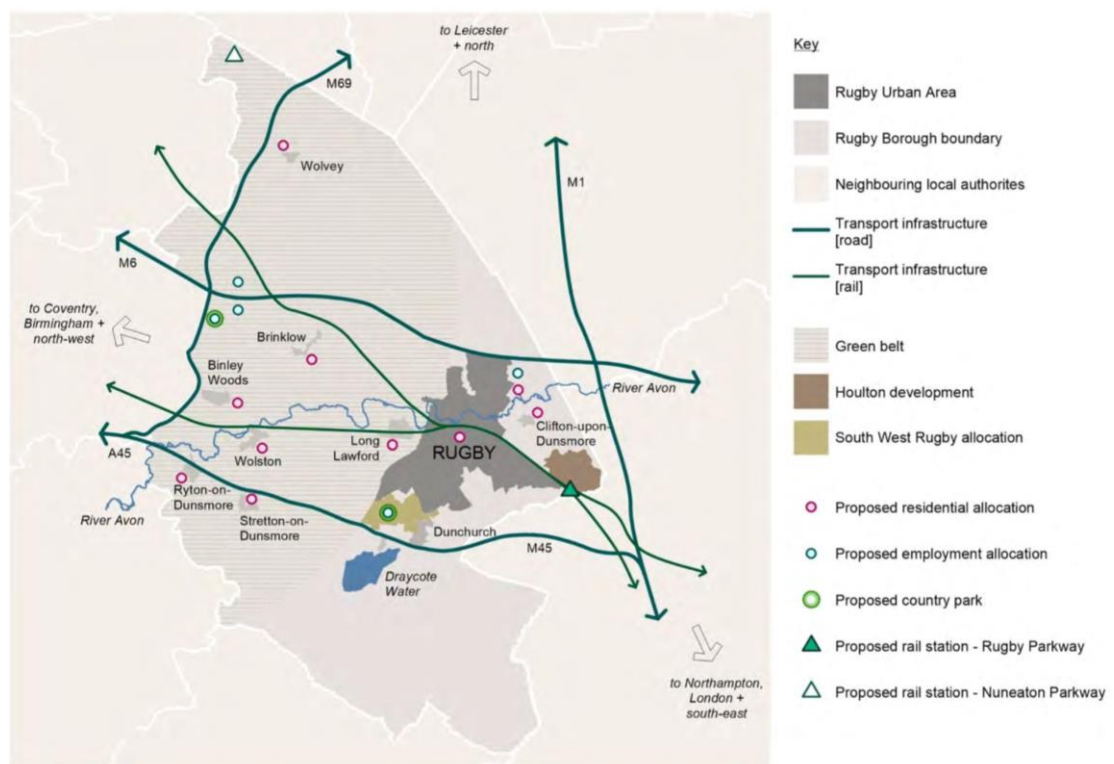
New employment land is focussed on the edges of Rugby and Coventry, as the main centres of labour, as expansions to existing employment areas with good access to main roads, active travel and public transport. This includes new allocations at the town’s main junctions with the strategic road network: Coton Park East close to M6 Junction 1 and South West Rugby at the M45/A45 Thurlaston interchange.

The largest allocation is for development to the west and north of regionally-significant Ansty Park on the edge of Coventry, accessed from M6 Junction 2/M69 and the new A46 Walsgrave Junction. This will deliver a combined 365,000m<sup>2</sup> of new floorspace, a 75ha expansion to Coombe Abbey Country Park, a new walking and cycling route to Coventry, a new blue-light access to University Hospital Coventry and Warwickshire and a potential route and depot for the planned first Coventry Very Light Rail line.

Although employment allocations are focused on large sites with access to the strategic road network, the Coton Park East and Walsgrave Hill (west of Ansty Park) sites also include requirements to deliver smaller units for SME businesses, while the northern expansion to Ansty Park will be ringfenced for research and development uses.

Finally, the plan is the first Local Plan for Rugby Borough to allocate sites for Gypsy and Traveller pitches. The Gypsy and Traveller Accommodation Assessment 2025 (GTAA) identifies a need for 94 pitches (1 April 2024 to 31 March 2042) and supply is identified for 68 pitches, sufficient to cover the period to 2035.”

**Figure 8.1: The Local Plan Key Diagram**



## 8.3 Appraisal methodology

- 8.3.1 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each sustainability topic the aim is to discuss the merits of the draft Local Plan, as a whole, before concluding on significant effects.
- 8.3.2 Specifically, the regulatory requirement is to “identify, describe and evaluate” the significant effects of “the plan” taking into account the available evidence and also mindful of wide-ranging effect characteristics, e.g. effects can be short or long term, and where an “effect” is a predicted change to the baseline situation, which is not simply a snap shot of the current situation, but also a projection of the current situation in the absence of the plan. As part of this, there is a need to recognise that housing growth locally would continue in the absence of the plan. The significance of any given effect is judged taking into account not only the magnitude of the predicted change to the baseline situation but also established objectives and targets (e.g. in respect of net zero). Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the plan will be implemented and the effect on particular ‘receptors’. The appraisal aims to be systematic and to explain evidence/assumptions. However, there is also a need for conciseness and accessibility (this is a key focus of SA reform).

# 9. Appraisal of the Local Plan

## 9.1 Introduction

- 9.1.1 The appraisal is presented below as a series of narrative discussions under the SA framework / with reference to the SA scope (Chapter 3). Each narrative begins by recapping the preferred growth scenario (**Scenario 1**) appraised in Part 1 (Chapter 6).

## 9.2 Accessibility

- 9.2.1 The appraisal of growth scenarios in Section 6 is strongly supportive of the housing growth strategy, and focusing on changes made since the Draft Plan stage there is support for the reduced focus on more rural villages, including accounting for comments received from the County Council and the NHS Integrated Care Board, and the added focus of growth at Long Lawford. Also, there is support for the new focus of growth in the Rugby urban area, although there is a need to recognise that urban site can face viability challenges with implications for the contributions that can be made to infrastructure. Finally, it is important to note that the situation regarding schools capacity issues / opportunities has evolved considerably since the Draft Plan stage, and overall the adjusted spatial strategy performs well in this regard, although this is a matter for ongoing consideration and close monitoring in some parts of the Borough.
- 9.2.2 Focusing on aspects of the spatial strategy that are held constant across the growth scenarios appraised in Section 6, perhaps the key point to note is the new proposed lower growth strategy for Wolvey. However, there is still significant growth directed to the village (210 homes) and the proposal is still to support a fairly high growth strategy at another one of the more rural villages, namely Brinklow (325 homes).
- 9.2.3 With regards to employment land, the appraisal in Section 6.3 is strongly supportive of the preferred strategy, because Land at Walsgrave Hill would deliver a 75ha country park adjoining Coombe Abbey Country Park.
- 9.2.4 With regards to site specific policy, a clear and well-targeted approach to setting out requirements for directing limited funds / making use of limited land (in the context of potentially challenging development viability) is to be commended. Policies set requirements in respect of:

- Public rights of way (12 sites).
- Pedestrian crossings or footways to ensure safe access (around 10 sites).
- Travel links in support of active travel (around 15 sites).
- Children’s play areas (five sites, and in once case this must be a ‘central feature’).
- Allotments / community orchards (two sites).

9.2.5 Also, it is noted that there is support for higher density development at Land south of Crick Road, Houlton, which is set to be a highly accessible location.

9.2.6 Finally, with regards to DM policy, there are a range of policies that are broadly supportive of accessibility objectives, but these are mainly fairly generic policies that need not be a focus of appraisal. No policies stand-out as giving rise to a tension with accessibility objectives, although car parking policy is always a policy area that generates interest and warrants ongoing scrutiny.

9.2.7 Two specific policies for consideration are:

- Policy W2 (Open space and sports provision) – Figure 9.1 serves to highlight the benefit in supporting larger sites that may be able to deliver new facilities as opposed to contributing funds that are then pooled to deliver facilities offsite.
- Policy C1 (Rugby town centre) – is presented below in full. It is noted a Rugby Central Supplementary Planning Document (SPD) has also been [drafted](#).

9.2.8 In conclusion, the plan is predicted to give rise to a **‘moderate or uncertain’ positive effect** on the baseline. Whilst the proposal at the Draft Plan stage was to deliver a new secondary school this is no longer the case. The following recommendation was made within the Interim SA Report at the Draft Plan stage and still holds true to some extent:

*“Moving forward it will be important to give further detailed consideration as to how best to realise growth-related opportunities through spatial strategy / site selection; ensuring that comprehensive growth is supported ahead of piecemeal growth as far as possible; and setting clear site-specific policy so that developers understand local priorities in the context of development viability.”*

**Figure 9.1: An extract from Policy W2**

### W2 Open space and sports provision

A. Residential development of 10 or more dwellings shall, through on-site provision or contributions, meet the open space standards set out below:

Typology	Area per 1,000 residents	Access distance (straight line)
Provision for Children & Young People	0.2ha	400m (LEAP) 1,000m (NEAP) 1,000m (Young People)
Natural & semi natural green spaces	2.5ha	700m
Parks & recreation grounds	1.25ha	700m
Amenity green spaces	1.27ha	300m
Allotments	0.65ha	800m
Rugby union	0.24 pitches	N/A
Adult football	0.22 pitches	N/A
Youth football	0.45 pitches	N/A
Mini soccer	0.37 pitches	N/A
Hockey	0.02 pitches	N/A
3G	0.05 pitches	N/A
Cricket	0.1 pitches	N/A

**Figure 9.2: Policy C1 and supporting text in full**

<p><b>C1 Rugby town centre</b></p> <p>A. Development up to 2042 in Rugby town centre (as shown on the policies map) will include:</p> <ol style="list-style-type: none"> <li>i. the redevelopment of Rugby Central Shopping Centre to restore street-based, mixed-use development (see development sites annex);</li> <li>ii. "the Stitch" comprising downgrading for traffic of North Street and part of Church Street and a refreshed Market Place public square;</li> <li>iii. redevelopment of Herbert Grey College for residential development;</li> <li>iv. a new mixed-use hub with a public square at Old Market Place as part of a cultural quarter; and</li> <li>v. a new apartment living quarter in the Station Gateway character area surrounding Rugby Station.</li> </ol> <p>B. Development in Rugby town centre shall accord with the following placemaking principles:</p> <ol style="list-style-type: none"> <li>i. support the town centre's role as a leisure and entertainment destination including a wide-ranging food and beverage offering;</li> </ol>	<ol style="list-style-type: none"> <li>ii. create new and improved cycle and pedestrian links, both within the town centre and to surrounding neighbourhoods;</li> <li>iii. avoid prejudicing the delivery of the comprehensive redevelopment opportunities which are set out in the Delivery Plan for the Town Centre;</li> <li>iv. front onto and provide active ground floor frontages to the town's street network;</li> <li>v. deliver public realm improvements that accord with the Town Centre Public Realm Masterplan;</li> <li>vi. deliver high quality urban living; and</li> <li>vii. support the enhancement of heritage buildings.</li> </ol> <p>4.1 The Town Centre Uses Study (Nexus Planning, 2024) highlights the challenges facing Rugby Town Centre. The Town Centre Public Realm Masterplan (2024) sets a framework for public realm enhancements. The Town Centre Delivery Plan will provide a delivery route for key opportunity areas in the town centre.</p> <p>4.2 Placemaking principles for allocated sites are set out in the Development site allocations annex. A Supplementary Planning Document is being prepared for Rugby Central Shopping Centre.</p>
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## 9.3 Air quality

- 9.3.1 The appraisals in Section 6 are supportive of the growth strategy, including the proposal to limit growth at Rugby and Dunchurch and to direct growth to Long Lawford, which is quite well connected in transport terms. It can also be noted that the new proposed approach is to support a shorter plan period (to 2042 rather than 2045), which is supported in that longer term strategy for growth must take careful account of the transport and air quality constraints affecting the Borough, and that future plan-making under Local Government Reform and Devolution will provide a good forum for this.
- 9.3.2 With regards to aspects of the growth strategy that are not a focus of the appraisals in Section 6 on account of being held constant across the growth scenarios, one point to note is that directing employment land to North of Ansty Park is supported given excellent connectivity to the strategic road network (SRN), and it may be that enabling the Park to grow / reach a critical mass is supportive of bus connectivity enhancements; however, the Park is quite distant from a train station.
- 9.3.3 It is also appropriate to flag directing further employment land to SW Rugby Employment Phase 2 as giving rise to tensions with transport / air quality objectives although, on the other hand, the effect will be to help facilitate delivery of major road / transport upgrades (and it is important to recall that this is an existing reserve site).
- 9.3.4 Site specific policies do not reference air quality, which is reasonable and appropriate given a need for concise policies targeted at key issues / opportunities, whilst numerous DM policies are supportive of transport objectives and, in turn, air quality objectives.
- 9.3.5 Air quality is, however, a focus of Policy EN9 (Air Quality), which is presented below in full. The policy requirements are likely suitably stringent in the context of a Borough with significant air quality constraints. However, there is a need to acknowledge that providing the necessary evidence could prove costly to the point of impacting development viability at some sites, particularly smaller sites.
- 9.3.6 In conclusion, the plan has been developed with a strong focus on minimising traffic congestion which is a key consideration with a bearing on poor air quality. Poor air quality is significant issue locally, as discussed, but the situation is improving nationally. Overall a **neutral effect** on the baseline is predicted.

**Figure 9.3: Policy EN9 in full**

<b>EN9 Air quality</b>	
A.	Development throughout the borough of more than 1,000m <sup>2</sup> of floorspace or 10 or more dwellings and development within the Air Quality Management Area that would generate any new floorspace must: <ol style="list-style-type: none"> <li>i. achieve or exceed air quality neutral standards, or</li> <li>ii. address the impacts of poor air quality due to traffic on building occupiers, and public realm or amenity space users by reducing exposure to and mitigating their effects, proportionate to the scale of the development.</li> </ol>
B.	The impacts of poor air quality can be reduced through: <ol style="list-style-type: none"> <li>i. the orientation and layout of buildings;</li> <li>ii. abatement technologies; and</li> <li>iii. urban greening.</li> </ol>
C.	Where air quality neutral standards are not met, measures to offset any shortfall will be required, according to the following hierarchy: <ol style="list-style-type: none"> <li>i. on-site measures; then</li> <li>ii. off-site measures; then</li> <li>iii. financial contributions.</li> </ol>

## 9.4 Biodiversity

- 9.4.1 The appraisal of housing growth scenarios in Section 6.2 does not flag a concern but suggests a possible case for supporting higher growth given clear potential to direct growth to locations with limited / low biodiversity constraint in the context of a wider sub-region where biodiversity is a notable constraint to growth.
- 9.4.2 The appraisal of employment land growth scenarios in Section 6.3 does not raise a major concern but acknowledges that Land at Walsgrave Hill is in proximity to Smite Brook / Coombe Pool to the south, and the associated SSSI that covers this area. There is good potential for mitigation and potentially enhancement of the river corridor.
- 9.4.3 As for aspects of the growth strategy held constant across the growth scenarios:
- Binley Woods / Wolston / Ryton-on-Dunsmore – the proposed low growth housing strategy is of note as this part of the Borough is arguably most sensitive in biodiversity terms.
  - Brinklow – there are limited sensitivities to the south of village, where the new proposed approach is to reduce the scale of growth. The adjacent smaller allocation for 75 homes is sensitive on account of an adjacent Local Wildlife Site (LWS) but is predominantly previously developed land. The LWS constraint could potentially warrant consideration through site specific policy.
  - Clifton-upon-Dunsmore – the strategy is unchanged and generates few concerns.
  - Long Lawford – the new proposed higher growth strategy is supported.
  - Stretton-on-Dunsmore – biodiversity is not a major factor with a bearing on key choices to the west of the village and the other proposed allocation is unchanged from the Draft Plan stage. This is a more sensitive site but is set to deliver significant new greenspace, plus site specific policy requires: *“Retention of existing mature trees and hedgerow on Fosse Way except to allow for creation of access.”*

- Wolvey – is overall somewhat sensitive on account of a close association with the River Anker corridor. As such, there is potentially support for the new lower growth strategy, although the main change is to reduce growth to the south of the village, where there is relatively limited sensitivity, and there is also a need to consider whether growth could potentially deliver some enhancements. The one allocation that is unchanged since the Draft Plan stage is notably adjacent to the river corridor.

9.4.4 Finally, with regards to allocations, SW Rugby Employment Phase 2 is notably constrained by adjacent Cawston Spinney, and careful consideration has been given to the matter of balancing employment land and open space – see Figure 9.4.

**Figure 9.5: Concept masterplan for SW Rugby Employment Phase 2**



9.4.5 With regards to site-specific policy, there could be the potential to add further requirements in respect of accounting for adjacent or onsite constraints. However, there is also a need to avoid unduly hindering site masterplanning and, in turn, site delivery in the context of potentially challenging development viability and wider objectives.

9.4.6 Finally, with regards to DM policy, a key point to note is a proposal not to require a level of BNG over-and-above the statutory minimum. It is not uncommon for local plans nationally to require 20%, but understanding nationally regarding implications for development viability and site delivery more widely (given practical challenges around securing biodiversity ‘credits’ where the requisite net gain cannot be achieved on site) is still evolving at the current time, and the new Draft NPPF (2025) is supportive of ensuring a level playing field nationally in respect of required “standards”.

9.4.7 In conclusion, there are no major concerns, but the focus of employment land growth to the east of Coventry is a matter for ongoing consideration, plus are several sites subject to a degree of constraint that warrant ongoing scrutiny. Overall, the Draft Local Plan is predicted to have a **neutral effect** on the baseline (a situation is one whereby development would continue to come forward without the benefit of an up-to-date plan).

N.B. a final consideration is Habitats Regulations Assessment (HRA), which focuses on the risk of impacts to internationally designated sites. The HRA (2025) concludes:

- “Taking into consideration the protection that Local Plan policies... give to water quality, outputs of the water quality modelling, and the location of allocations, it can be concluded that there will be no [significant impacts] as a result of the Local Plan either alone or in-combination on the Severn Estuary SAC and Ramsar.”
- “Taking into consideration the distance between the SAC and the nearest residential allocation, threats and pressures identified by Natural England at the SAC, the availability of accessible alternative recreational spaces and legal angling sites in and around the Plan area, and the policies within the Plan designed to ensure open space provision accommodates future growth set out in the Local Plan (including new Country Park provision), it can be concluded that the Local Plan will have no [significant impacts] due to recreational pressures on Ensor’s Pool SAC...”

## 9.5 Climate change adaptation

- 9.5.1 Focusing on flood risk, as a key climate change adaptation consideration, the appraisal of reasonable alternative growth scenarios in Section 6 does not flag any major concerns. Potentially of primary importance will be confirming that Land at Walsgrave Hill, which is a major new strategic employment allocation, can be brought forward whilst avoiding development in the flood zone and avoiding the worsening of downstream flood risk (the potential to achieve a betterment might be explored).
- 9.5.2 With regards to sites that are not a focus of appraisal in Section 6 on account of being held constant across the growth scenarios appraised, flood risk is not thought to be a significant constraint at any of the sites in question. However, the new proposed urban allocations will warrant scrutiny ahead of plan finalisation because there can be pressure to accept a degree of flood risk when intensifying uses in urban areas (i.e. support for residential at sites that have historically be seen as appropriate for less sensitive uses).
- 9.5.3 North of Ansty Park is also notable as a large employment site that is adjacent to a fluvial flood zone, with some flood risk affecting an employment area in Coventry distance downstream, but there should be good potential to avoid development intersecting the flood zone and to deliver Sustainable Drainage Systems (SuDS).
- 9.5.4 None of the site-specific policies reference flood risk or sustainable drainage, but this does not necessarily generate any concerns (to be confirmed following consultation with the EA). There are then area-wide DM policies covering flood risk, sustainable drainage and climate change adaptation, but all are fairly standard policies (in the context of forthcoming National Development Management Policies) and a policy requiring canopy cover (Policy EN6) which may be beneficial to climate change adaptation.
- 9.5.5 In conclusion, directing growth away from areas of flood risk sensitivity has been a key factor influencing site selection, although there remain some minor questions at the current time ahead of further work on masterplanning. A **neutral effect** is predicted.

## 9.6 Climate change mitigation

- 9.6.1 The appraisal in Section 6.2 is supportive of the proposal to direct growth to greenfield sites with strong viability credentials, but overall there is a potential that development viability could on occasion be a barrier to delivering net zero developments.
- 9.6.2 Policy CL1 (Net Zero Buildings) is clearly of great importance, and is strongly supported, but there is a need to recognise that DM policies will often not be fully implemented on viability grounds, e.g. to allow for affordable housing to be prioritised. The policy is highly commended for its conciseness and clarity, with it being a well-understood issue nationally that equivalent policies can be complex such that, in turn, implementation can be challenging (particularly for smaller developments), and it can be a challenge to effectively scrutinise and evaluate the performance of planning applications. It is noted that the Draft NPPF (2025) does not support local net zero development policies, instead suggesting reliance should be placed on Building Regulations, but the policy drafted here involves an alternative metric that is very strongly supported.

- 9.6.3 In conclusion, whilst it is difficult to conclude that built environment decarbonisation has been a strong focus of spatial strategy / site selection, close consideration has been given to supporting sites with strong development viability credentials such that there is confidence in the ability for allocations to come forward in accordance with Policy CL1, i.e. come forward as net zero development. It is also the case that the Council has not committed to achieving net zero development borough-wide by a particular date (e.g. 2030 as is quite common amongst local authorities nationally) such that, on balance, it is considered appropriate to predict a **neutral effect** on the baseline.

**Figure 9.6: Policy CL1 and supporting text in full**

#### CL1 Net zero buildings

- A. New buildings comprising one or more dwellings and new non-residential buildings of 100m<sup>2</sup> gross internal area or more must be designed and built to be net zero carbon in operation. To achieve this, new buildings must:
- be ultra-low energy,
  - be fossil fuel free (except where the use of fossil fuels is technically necessary for emergency and life-safety systems or essential systems serving buildings with critical functions), and
  - generate at least the same amount of renewable electricity on-site as the electricity they demand over the course of a year, such demand including all regulated and unregulated energy use, or
  - if iii is not technically achievable for a particular building typology in its context, on-site renewable energy generation shall be fully maximized as practicable. A reasonably practical maximum PV generation shall be 120kWh per square metre of building footprint per year, or solar PV panels of an area equating to 70% of the building's footprint. Where it is claimed that the fullest practicable extent is less than this, this must be justified by evidence demonstrating why

a reduced amount is proposed and what design steps have been taken to strive to achieve this policy's stated target.

- B. To help achieve criterion A.i. above, new dwellings shall achieve:
- a maximum space heating demand of 30kWh/m<sup>2</sup>/yr; and
  - total Energy Use Intensity (EUI) of no more than 40kWh/m<sup>2</sup>/yr.
  - On major housing developments, the EUI requirement in (ii) above may be achieved as a site wide average provided that no single dwelling exceeds an EUI of 60kWh/m<sup>2</sup>/yr.
- C. To help achieve criterion A.i. above, new build non-residential buildings shall achieve:
- a maximum space heating demand of 20kWh/m<sup>2</sup>/yr; and
  - a maximum total EUI of 70kWh/m<sup>2</sup>/yr for schools and offices; or 35kWh/m<sup>2</sup>/yr for warehouses and light industrial uses (without refrigeration/conditioning); or a maximum regulated-energy-only EUI of 40kWh/m<sup>2</sup>/yr for all other uses.
- D. Proposals that are built and certified to Passivhaus Classic or a higher Passivhaus standard will be deemed

to meet space heating demand and EUI requirements under paragraph B and/or paragraph C. Demonstration of compliance with the requirements in paragraph A for development to be fossil fuel free and for onsite annual renewable energy generation capacity to at least equal annual energy demand will still be required.

- 2.1 Building Regulations (specifically Part L) set minimum standards for the energy efficiency of buildings. The Future Homes and Future Buildings Standards are expected, but it is anticipated that these standards will not result in buildings which are net zero carbon. Instead, they will make new buildings net zero carbon 'ready', so that they can become net zero as the national energy grid decarbonizes. In Rugby Borough we want to go further and faster, to achieve net zero carbon development at the earliest opportunity.
- 2.2 A net zero building produces at least as much energy as it uses over the course of a year. This is achieved through a combination of measures to generate renewable energy on site whilst reducing the overall energy demand of the building, for example energy for heating and cooling the building, for generating hot water and for lighting.
- 2.3 To demonstrate how development proposals meet the requirements of this policy they must be accompanied
- by an energy statement. The energy statement must detail assured performance arrangements, including:
- 2.3.1. The submission of pre-built estimates of energy performance including the building specifications on which these are based (within which the predicted EUI and space heat demand must be calculated using an energy modelling method that is demonstrably accurate in its predictions of those metrics); and
- 2.3.2. Prior to each dwelling being occupied, the submission of updated, accurate and verified 'as built' calculations of energy performance.
- 2.3.3. In-use energy monitoring for the first 5 years of operation is required on a minimum of 10% of dwellings for development proposals of 100 dwellings or more, or a 10% representative sample of premises for non-residential development of 10,000m<sup>2</sup> (gross internal area) or more.
- 2.4 The energy statement should employ accurate calculation methods. The methods PHPP and CIBSE TM54 will be considered acceptable. SAP and SBEM do not provide sufficiently accurate outputs, but there are free tools online that can adapt SAP outputs to be sufficiently accurate, such as Cornwall Council's "[Energy Summary Tool SAP v2](#)". Other methods may be considered by the council if shown to be accurate.

## 9.7 Communities, health and well-being

9.7.1 Work to appraise growth scenarios in Section 6 is supportive of the proposed submission strategy in absolute terms but flags a potential argument for replacing some growth at villages with a strategic urban extension to Rugby.

9.7.2 With regards to sites that are not a focus of appraisal in Section 6, a key point to note is that adjustments have been made to the growth strategy across a number of villages. As part of this, the concerns raised by the NHS Integrated Care Board and the County Council regarding a focus of growth at village have been taken into consideration.

9.7.3 Also, with regards to the employment land strategy, it is important to note that there remains a strong focus on delivering new strategic green infrastructure and also Gypsy and Traveller pitches. However, the new proposed approach is not to deliver pitches at Coton Park East employment site, which warrants ongoing consideration.

9.7.4 Finally, there is a new focus on local landscape and settlement separation designations, including accounting for concerns raised through consultation.

9.7.5 With regards to area-wide DM policies, there are extensive requirements aimed at ensuring that development comes forward in line with communities, health and well-being objectives, including the site-specific policy requirements discussed above under the 'accessibility' heading. Key area-wide policies of note are:

- W1 (Protection of Community Facilities) – amongst other things explains: *“The council supports the restoration of Coventry Stadium, Brandon for speedway and stock car racing and other motor sports together with other community uses.”*
- W2 (Open Space and Sports Provision) – sets out clear quantified requirements, which are then supplemented through site-specific policy as appropriate.
- H7 (Housing standards) – is an important policy as there are implications for development viability. Matters have been carefully considered, informed by a Nationally Described Space Standard Report (2025), which concludes:
 

*“... out of 1637 total properties (increasing to 1652 if PR24/0390 is approved) 955 of these are below the NDSS, and 682 (697 with PR24/0390) are in line or above. This equates to 58.34% (57.81% PR24/0390) below and 41.66% (42.19% PR24/0390) above. Affordable properties are particularly likely to be below the standard, with all but 1 of the 375 looked at falling short (99.73%).”*

9.7.6 In conclusion, whilst it is recognised that there are some local concerns, the proposed approach to spatial strategy / site selection has a clear focus on minimising negative effects and realising opportunities. The Council took the voluntary step of consulting on a full Draft Local Plan under Regulation 18, and it is clear that issues raised have fed into the Proposed Submission Plan. Overall, it is considered appropriate to predict a **'moderate or uncertain' positive effect** on the baseline (a situation whereby development continues to come forward in the absence of an up-to-date Local Plan).

N.B. evidence and understanding also comes from the Equalities Impact Assessment (EqIA) that is published alongside the Local Plan. From the EqIA it is noted that impacts to groups with protected characteristics are judged to be positive and mostly of limited significance. A more significant cause / effect relationship is highlighted between the Local Plan and those with disabilities, with the EqIA concluding:

*“There are a wide range of needs amongst people living with disability... All of these matters which are relevant to the local plan, which seeks to provide accessible, healthy and inclusive streets, spaces/public realm, open spaces and buildings. Evidence was developed as part of the HEDNA and updated in the Housing Needs Report (2025) in relation to housing needs for people with disabilities. In response, the plan includes policies and allocations for specialist housing, with links identified between age and disability. In addition, policy H7 sets out standards for new housing, including adaptable buildings, and meeting requirements for wheelchair users.”*

## 9.8 Economy and employment

- 9.8.1 The appraisal of growth scenarios presented in Section 6 is very strongly supportive of the proposed growth strategy. The entirely non-committed allocation that is not a focus of the appraisal in Section 6 is North of Ansty Park, which is very strongly supported as uses can be 'ring fenced' to B2, E(g)(ii) and E(g)(iii) and there is a need to build on the success of Ansty Park. In combination with adjacent Walsgrave Hill (discussed in detail in Section 6) and Crowner Fields Farm (permitted), there is excellent potential to enhance this sector of the Coventry edge as a regionally significant employment area.
- 9.8.2 With regards to South West Rugby Employment Phase 2, whilst it is an existing reserve site, there is a need to balance: A) a desire to deliver employment land in well-linked location and support the viability of the wider South West Rugby development; with B) biodiversity and landscape constraints, including relating to adjacent Cawston Spinney.
- 9.8.3 With regards to Coton Park East, it is noted that this is sloping land which can be a constraint to delivering B8 units, but a planning application is now nearing submission (<https://cotonparkeast.co.uk>) the site is set to be delivered by a major operator and the new proposal not to require Gypsy and Traveller pitches could assist with delivery.
- 9.8.4 Finally, with regards to the seven area-wide policies presented under the 'Economy' and 'Centres' headings within the Local Plan, most are quite standard policies that need not be a focus of appraisal, but the Rugby Town Centre policy is clearly of note for reflecting a targeted approach to addressing specific issues / realising opportunities. On this point, it can also be noted that the plan now allocates significant sites in the town centre which did not feature at Regulation 18 stage, and a Town Centre SPD has been drafted.
- 9.8.5 One DM policy of note is Policy I4 (Infrastructure and planning obligations) which requires: *"Developments of 50 or more homes and commercial developments of 10,000m<sup>2</sup> or more in floorspace will be required to provide employment and skills plans to deliver opportunities for local residents to access employment and training."* This may well be justified in the Rugby context, but it is noted that a similar policy has recently come under scrutiny as part of the Bristol Local Plan Examination in Public, with an [Inspector's Letter](#) (November 2025) questioning justification and effectiveness.
- 9.8.6 In conclusion, a **significant positive effect** is predicted. The proposed strategy involves making provision for a large-than-local need and reflects a clear vision including supporting mixed use strategic employment sites well linked to Coventry.

## 9.9 Historic environment

- 9.9.1 The appraisals in Section 6.2 acknowledges that there will be some historic environment impacts as a result of the housing growth strategy, but these are overall of limited significance, and it is not possible to identify an alternative strategy that is preferable in terms of historic environment objectives. With regards to the employment land strategy, the new proposal to support Walsgrave Hill does give rise to a degree of tension with historic environment objectives, but there is good potential for mitigation, and overall there is confidence that a suitably strategic approach is being taken to growth along this sector of Coventry's edge with a long term perspective.
- 9.9.2 With regards to sites that are not a focus of appraisal in Section 6 on account of being held constant across the growth scenarios appraised, attention focuses on:
- Binley Woods – whilst the village is relatively unconstrained the new proposed allocation is in proximity to a grade II listed Ice House in Brandon Little Woods, as well as a cluster of grade II listed buildings in Brandon to the southeast.
  - Brinklow – is sensitive in historic environment terms but significant adjustments have been made since the Draft Plan stage aimed at avoiding impacts.
  - Clifton-upon-Dunsmore – one of the allocations (60 homes) is adjacent to the village conservation area and it is also important to note an omission site to the south that comprises the former grounds of Clifton Hall (albeit not listed).

- Stretton-on-Dunsmore – is sensitive in historic environment terms but the proposed allocations are mostly subject to limited constraint. One of the allocations has been closely examined to consider archaeological constraint.
- Rugby urban area – there are not known to be any major concerns regarding impacts, and there may be some opportunities to make good use of underutilised / unattractive sites with resulting historic environment benefits. However, this will be a matter for scrutiny through the current consultation / ahead of plan finalisation. It is noted that several of the site specific policies reference historic environment constraint, and so there is a need to consider implications for viability/delivery.

9.9.3 With regards to wider site-specific policy, there are a small number of references to historic environment sensitivities that must factor-in to site masterplanning and design. It is noted that site specific policy for the proposed 400 home allocation directly to the south of Long Lawford has been significantly adjusted since the Draft Plan stage, with a new requirement as follows:

*“Retain and reuse the 19th century L-plan building to the southwest of Avon Lodge if it is found to be of historical interest. Layout to provide some open space buffer to the listed farmhouse (Avon Lodge) and L-plan building (if retained).”*

9.9.4 In conclusion, whilst the proposed allocations will generate some historic environment impacts there is also a need to recognise that the baseline situation is one whereby there is ongoing pressure for growth under the presumption in favour of sustainable development. On balance a **neutral effect** is predicted. As part of this, it is noted that Historic England commended the Council through the Draft Local Plan consultation on the basis that “heritage considerations have been integral to the site selection process”.

## 9.10 Homes

9.10.1 The appraisal in Section 6.2 is strongly supportive of the proposed strategy. Whilst there is a theoretical case for higher growth, the case to be made for higher growth is overall quite limited. Changes made since the Draft Plan stage are overall strongly supported, including recognising limited case to be made for a longer plan period in the context of LGR and devolution, although it is important to note the potential for delivery challenges in respect of the new proposed higher growth strategy for the urban area.

9.10.2 Providing for Gypsy and Traveller accommodation needs is another key consideration and, in this regard, whilst the proposed submission plan represents a step change in terms of taking a proactive approach, there is a need for ongoing work to consider options for new sites and also ongoing work to consider the possibility of delivering additional pitches within strategic employment sites. Having said this, it is recognised that DM policy is supportive of ongoing supply from windfalls, particularly Policy S4 but also other relevant policies including I1 (Transport), D1 (Well-designed places), D3 (Landscaping) and EN8 (Environmental protection and amenity).

9.10.3 There are then a range of important area-wide DM policies, most notably Policy H2 (Affordable Housing) which requires:

*“Developments that result in ten or more new homes (including conversions and subdivisions but excluding specialist older persons’ accommodation) shall provide at least the following proportion of new homes as affordable homes: i. Within the Rugby urban area 20%; ii. Elsewhere in the borough 30%; iii. On sites released from the Green Belt through this plan or other Green Belt permissions: 40%. The tenure mix of affordable homes should be 70% social rent and 30% shared ownership”.*

9.10.4 There is little reason to suggest that there could be the potential to boost affordable housing requirements by accepting compromises elsewhere (e.g. net zero development), but this is a matter for ongoing consideration ahead of plan finalisation.

- 9.10.5 Another key policy is Policy H8 (Houses in multiple occupation) which seeks to respond to a Rugby specific issue (it is noted that the Draft NPPF, recently published in December 2025, does not include a national policy on HMOs). This is a specialist area of policy making such that it warrants ongoing scrutiny ahead of plan finalisation including with a focus on the needs of those who rely on HMOs for accommodation.
- 9.10.6 In conclusion, a **significant positive effect** is predicted. Whilst the strategy is slightly less positive relative to the draft plan stage, it remains strongly supported.

## 9.11 Landscape and townscape

- 9.11.1 With regards to housing growth the proposed strategy has been adjusted since the Draft Plan stage to account for key landscape sensitivities and is judged to perform well, but the new proposed allocation of Walsgrave Hill as a strategic employment site gives rise to a tension with landscape objectives (but there is good potential for mitigation).
- 9.11.2 With regards to sites that are not a focus of appraisal in Section 6 on account of being held constant across the growth scenarios appraised, one consideration is Clifton-upon-Dunsmore, where there is a need to carefully consider long term growth strategy from a landscape perspective.
- 9.11.3 With regards to site specific policy, a key point to note is South West Rugby Employment Phase 2, where detailed consideration has been given to the scale of employment land versus the scale of greenspace as a buffer to Cawston Spinney.
- 9.11.4 The other key point to note is the new proposal to designate a landscape to the south of Rugby as locally significant and also to designate two settlement gaps on the edge of Rugby. This approach is strongly supported from a landscape perspective, but there is also a need to ensure that the effect will not be to unduly hinder strategic consideration of growth options aimed at delivering growth in a way that aligns with wider objectives.
- 9.11.5 In conclusion, whilst the equivalent appraisal at the Draft Plan stage predicted a 'moderate or uncertain' negative effect, this was explained as "potentially somewhat marginal" and the report stated: *"It should be possible to conclude a neutral effect following further work to consider site specific policy and feasibly also adjustments to site boundaries. it is now possible to conclude a neutral effect."* At this stage it is possible to conclude a **neutral effect**; however, a number of key areas in the Borough require ongoing consideration regarding how best to balance growth and landscape objectives looking ahead with a long term perspective.

## 9.12 Resources

- 9.12.1 The conclusion reached across Sections 6.2 and 6.3 is that there will be a loss of BMV agricultural land that is potentially significant, but it is difficult to confidently identify an alternative preferable strategy.
- 9.12.2 With regards to sites that are not a focus of appraisal in Section 6 (on account of being constants), one point to note is Clifton-on-Dunsmore, where the nationally available low resolution / accuracy dataset shows there to be significant grade 2 quality (BMV) agricultural land, particularly to the south and east of the village.
- 9.12.3 In conclusion, given the likely loss of BMV agricultural land it is appropriate to predict a **'moderate or uncertain' negative effect**; however, there is also a recognition that there could be similar or worse loss under a baseline scenario.

## 9.13 Transport

- 9.13.1 Work to appraise growth scenarios in Section 6 shows the proposed submission approach to spatial strategy / site selection to perform very well, and there is strong support for the adjustments made since the Draft Plan stage, informed by consultation responses received and the Strategic Transport Assessment (2025).

- 9.13.2 With regards to sites that are not a focus of appraisal in Section 6 on account of being held constant across the growth scenarios appraised, attention focuses on:
- Ansty Park – well linked to the strategic road network, but distant from a train station although it is noted that Coventry City Council are promoting a railway station in the east of Coventry (albeit that proposal is at an early stage).
  - Binley Woods – a village with a high settlement score, such that the new proposal to allocate at the village is tentatively supported.
  - Brinklow and Wolvey – as rural villages the new lower growth strategy is overall supported in transport terms, although there is a need to recognise that growth can assist with maintaining/enhancing village facilities and bus services.
  - Newton – a rural village, but with a good settlement score and close to facilities in Rugby. There is a need to consider growth in combination with Coton Park East.
  - South West Rugby Employment Phase 2 – will help to deliver planned strategic road / transport upgrades, hence the reduced scale of growth can be questioned.
  - Stretton-upon-Dunsmore – a village not directly linked to an A-road and with a ‘middling’ settlement score. Growth may support public transport enhancements, and the adjustment to the strategy since the Draft Plan stage is supported.
- 9.13.3 Transport objectives are then a key focus of area-wide and site-specific DM policy, and it is difficult to suggest any significant tensions with wider objectives. Site specific policy aimed at securing walking and cycle upgrades is of considerable importance, and overall there is support for a well-targeted approach. For example Site 59 at Newton:
- “Pedestrian and bicycle links to connect to and through Great Central Walk to link with Coton Park East.
  - Provision of pedestrian footway and cycle track along Newton Manor Lane.
  - The existing Public Rights of Way (PRoW) must be maintained, and the design of the development must ensure they are pleasant to use. Wherever possible PRoW should be routed through public open space, be segregated from roads, and be well overlooked. PRoW should be maintained on their existing lines, with diversions only occurring where this is not practicable. PRoW should be accessible to as many people as possible, including those who are disabled or less mobile.
  - Provision of crossing facilities on Newton Manor Lane
  - Pedestrian and cycle permeability through the site, including links to any new secondary school at St Thomas Cross.
  - Measures to manage the speed of motor traffic on Newton Manor Lane.
  - Contributions may be required towards delivery of cycle route network improvements identified in the Local Cycling and Walking Infrastructure Plan (LCWIP), including R01 (Coton Park East), and R46 (Great Central Walk between Crowthorns and Newton).
  - Contributions may be required towards the A426/Newton Manor Lane scheme identified in the Infrastructure Delivery Schedule and Strategic Transport Assessment which is likely to involve the partial signalisation of the roundabout, with signals added to the A426 North and A426 South approach arms and adjacent circulatory, as well as pedestrian crossing provision.”
- 9.13.4 In **conclusion**, at this stage it is considered appropriate to predict a **‘moderate or uncertain’ positive effect** recognising the extent to which transport has been a focus of spatial strategy / site selection and adjustments made since the Draft Plan stage,

## 9.14 Water

- 9.14.1 The appraisals in Section 6 do not flag any concerns and it is difficult to elaborate further here, other than by stating support for Policy CL3 (Water supply, quality and efficiency), which requires:

*New dwellings shall demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling, as calculated in accordance with the methodology in the water efficiency calculator, does not exceed 110 litres per person per day in line with regulation 36(2)(b) of the Building Regulations 2010 (as amended). D. New non-residential development that is major development shall achieve full credits for category Wat 01 of BREEAM, unless demonstrated impracticable.”*

- 9.14.2 In conclusion, a **neutral effect** is predicted.

## 9.15 Appraisal conclusion

- 9.15.1 The appraisal predicts: significant positive effects under two headings (economy / employment and homes); moderate or uncertain positive effects under three headings (accessibility, communities/health/wellbeing and transport) and moderate or uncertain negative effects under one headings (resources). Neutral effects are predicted under the remaining headings (which is not to suggest that there are not certain tensions with sustainability objectives to explore further). There is strong support for changes made since the Draft Plan stage, albeit also some aspects of the changes can be questioned in some respects (i.e. under specific sustainability topic headings).
- 9.15.2 There will be the potential to make adjustments to the plan through the examination in public in order to improve the performance of the plan, albeit the remit/role of the Planning Inspector(s) will be limited. The appraisal highlights a number of specific matters that might be given further consideration; however, it is difficult to make specific recommendations, because any recommendation made with a view to improving the performance of the plan under one sustainability topic heading could have knock-on implications for performance under another heading. For example, it would be easy to recommend more stringent requirements in respect of affordable housing within the urban area, but there would be implications for wider objectives with cost implications and/or the deliverability of the sites would be called into question.
- 9.15.3 Focusing on DM policy, moving forward it will be important to consider policy requirements in the round where they are associated with a cost for developers, with a view to striking the right balance between policy priorities (e.g. affordable housing versus infrastructure versus wider policy asks) in the context of development viability. It is important to be clear what is being prioritised and what compromises are being made / trade-offs accepted with a view to a ‘whole plan’ with good viability credentials and, in turn, minimal delivery risk (albeit delivery risk is reduced by a healthy supply buffer).
- 9.15.4 Finally, as part of SA there is a requirement to consider ‘**cumulative effects**’, i.e. the effects of a local plan in combination with other local plans and other strategies. This has already been a focus of considerable discussion above, particularly the matter of close collaboration Coventry and the Warwickshire authorities in respect of providing for employment land needs. Overall the proposed strategy is judged to perform very well, but the new reduced plan period is also acknowledged. Moving forward it is important to recall the context of Local Government Review (LGR) and devolution, under which there will be excellent potential to provide for development needs across the sub-region.

# Part 3: Next steps

## 10. Plan finalisation

- 10.1.1 Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the aim is to submit the plan for examination in public alongside a summary of the issues raised through the Regulation 19 publication period.
- 10.1.2 Once found to be sound following examination the Local Plan will be adopted, at which time an SA 'Statement' will present prescribed information including "measures decided concerning monitoring".

## 11. Monitoring

- 11.1.1 In light of the appraisal presented above it is recommended that monitoring efforts over the course of plan implementation might include a focus on:
- Employment land – as a nationally significant growth location it will be important to monitor employment land delivery closely, including in respect of the specific types of employment units coming forward within strategic employment sites.
  - Schools capacity – this is a key issue locally, and effective monitoring of capacity issues and opportunities will assist with future plan-making.
  - Delivery on policy requirements – given viability challenges there should be a focus on monitoring the extent to which policy requirements are being delivered in full, including in respect of transport infrastructure, affordable housing and net zero development, plus there should be close monitoring of sites where delivery has been delayed. This will be key information to inform future local plan-making.

# Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements for the SA Report.

*Table A: Questions answered by this SA Report, in-line with an interpretation of regulations*

		Questions answered	As per regulations... the SA Report must include...
<b>Introduction</b>		What's the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
		What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>Relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	What's the SA scope?	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>Part 1</b>	What has plan-making / SA involved up to this point?		<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>
<b>Part 2</b>	What are the SA findings at this current stage?		<ul style="list-style-type: none"> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>
<b>Part 3</b>	What happens next?		<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>

**Table B: Interpreting Schedule 2 and linking the interpretation to the report structure**

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues &amp; objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> <b>[Part 1 of the Report]</b>
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> <b>[Part 2 of the Report]</b>
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> <b>[Part 3 of the Report]</b>

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
<b>Schedule 2 of the regulations lists the information to be provided within the SA Report</b>	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report.
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an 'SA framework', which is presented within Section 3.
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	The SA scope – in terms of key sustainability issues and objectives, including accounting for evolution of the baseline without the plan – is then discussed within the appraisal sections as appropriate, i.e. in light of the options and proposals that are a focus of the appraisal.
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) fed into the 'SA framework', which is presented within Section 3. Also, information on the SA scope is presented as part of appraisal work in Sections 6 and 9.  With regards to explaining "how... considerations have been taken into account", Section 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the various effect characteristics.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan...	Section 9 presents recommendations but perhaps more importantly flags 'tensions' that can be a focus of further work ahead of plan finalisation.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios.  Sections 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives / scenarios appraisal.  Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is presented at the start of the report.
<b>The SA Report must be published alongside the draft plan, in-line with the following regulations</b>	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan...	This SA Report is published alongside the Proposed Submission Local Plan in order to inform representations and then subsequent plan-making stages. Specifically, the next stage is expected to be examination in public.
<b>The SA Report must be taken into account, alongside consultation responses, when finalising the plan.</b>	
The environmental report prepared pursuant to Article 5 [and] the opinions expressed pursuant to Article 6... shall be taken into account during the preparation of the plan... and before its adoption or submission to the legislative procedure.	This SA Report will be taken into account when finalising the plan as part of the examination in public. It should also be noted that an Interim SA Report was published alongside the Draft Local Plan earlier in 2025 and that report, and responses received through the consultation, fed into subsequent work.

