

19 December 2025

CABINET – 6 JANUARY 2026

A meeting of Cabinet will be held at 6.00pm on Tuesday 6 January 2026 in the Council Chamber at the Town Hall, Rugby.

Members of the public may also view the meeting via the livestream available on the Council's website.

Dan Green
Chief Executive

A G E N D A PART 1 – PUBLIC BUSINESS

1. Minutes.

To confirm the minutes of the extraordinary meeting held on 17 December 2025.

2. Apologies.

To receive apologies for absence from the meeting.

3. Declarations of Interest.

To receive declarations of –

(a) non-pecuniary interests as defined by the Council's Code of Conduct for Councillors;

(b) pecuniary interests as defined by the Council's Code of Conduct for Councillors; and

(c) notice under Section 106 Local Government Finance Act 1992 – non-payment of Community Charge or Council Tax.

Note: Councillors are reminded that they should declare the existence and nature of their interests at the commencement of the meeting (or as soon as the interest becomes apparent). If that interest is a prejudicial interest, the Councillor must withdraw from the room unless one of the exceptions applies.

Membership of Warwickshire County Council or any Parish Council is classed as a non-pecuniary interest under the Code of Conduct. A Councillor does not need to declare this interest unless the Councillor chooses to speak on a matter relating to their membership. If the Councillor does not wish to speak on the matter, the Councillor may still vote on the matter without making a declaration.

4. Question Time.

Notice of questions from the public should be delivered in writing or by e-mail to the Chief Executive at least three clear working days prior to the meeting (no later than Tuesday 23 December 2025).

Growth and Investment, Digital and Communications Portfolio

- 5. Rugby Borough Local Plan 2025-2042 Regulation 19 Consultation and submission.
- 6. Rugby Central Supplementary Planning Document Consultation.
- 7. Town Centre Frontages Grant Scheme.

Partnerships and Wellbeing Portfolio

- 8. GEC Recreation Ground Changing Room development.

Finance, Performance, Legal and Governance Portfolio

- 9. Council Tax Base 2026/27, Draft General Fund Revenue and Capital Budget 2026/27 and Medium Term Financial Plan 2026-2030 (report to follow).
- 10. Draft Housing Revenue Account Capital and Revenue Budgets 2026/27 and Medium Term Financial Plan 2026-2030 (report to follow).

Communities, Homes, Regulation and Safety Portfolio

- 11. Assets and Property Repairs Service - Transformation journey and resulting budgetary impact.
- 12. Warwickshire Joint Statement of Intent to Tackle Homelessness.

Operations and Traded Services Portfolio

Nothing to report to this meeting.

Organisational change Portfolio

Nothing to report to this meeting.

The following item contains reports which are to be considered en bloc subject to any Portfolio Holder requesting discussion of an individual report

Nothing to report to this meeting.

- 13. Motion to Exclude the Public under Section 100(A)(4) of the Local Government Act 1972.

To consider the following resolution:

“under Section 100(A)(4) of the Local Government Act 1972 the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of information defined in paragraphs 1 and 2 of Schedule 12A of the Act.”

PART 2 – EXEMPT INFORMATION

Growth and Investment, Digital and Communications Portfolio

Nothing to report to this meeting.

Partnerships and Wellbeing Portfolio

Nothing to report to this meeting.

Finance, Performance, Legal and Governance Portfolio

1. Election of Mayor and Appointment of Deputy Mayor 2026/27.

Communities, Homes, Regulation and Safety Portfolio

Nothing to report to this meeting.

Operations and Traded Services Portfolio

2. Waste Services Reorganisation - Phase 2.

Organisational change Portfolio

Nothing to report to this meeting.

The following item contains reports which are to be considered en bloc subject to any Portfolio Holder requesting discussion of an individual report

Nothing to report to this meeting.

Any additional papers for this meeting can be accessed via the website.

The Reports of Officers are attached.

Membership of Cabinet:

Councillors Moran (Chair), C Edwards, Livesey, Mistry, O'Rourke and Robinson.

CALL-IN PROCEDURES

Publication of the decisions made at this meeting will normally be within three working days of the decision. Each decision will come into force at the expiry of five working days after its publication. This does not apply to decisions made to take immediate effect. Call-in procedures are set out in detail in Standing Order 15 of Part 3c of the Constitution.

If you have any general queries with regard to this agenda please contact Claire Waleczek, Democratic and Support Services Manager (01788 533524 or e-mail claire.waleczek@rugby.gov.uk). Any specific queries concerning reports should be directed to the listed contact officer.

AGENDA MANAGEMENT SHEET

Report Title: Rugby Borough Local Plan 2025-2042 Regulation 19 Consultation and Submission

Name of Committee: Cabinet

Date of Meeting: 6 January 2026

Report Director: Chief Officer - Growth and Investment

Portfolio: Growth and Investment, Digital and Communications

Ward Relevance: All wards

Prior Consultation: Planning Services Working Group 11 November 2025
Labour group 11 November 2025
Liberal Democrat group 18 November 2025
Conservative group (4 nominated members) 20 November 2025.
All members briefing 16 December 2025

Contact Officer: Neil Holly, Development Strategy Manager

Public or Private: Public

Report Subject to Call-In: No

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
☒ A Healthier Rugby – To support people to live healthier, longer, and more independent lives.
☒ A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.
☒ A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.
☒ A Fairer Rugby – To reduce inequalities and improve housing across the Borough.
[Corporate Strategy 2025-2035](#)
☐ This report does not specifically relate to any Council priorities but

Summary:	<p>The report seeks a recommendation to Council for the Proposed Submission Local Plan be approved for public consultation and then submitted to the Secretary of State for independent examination. The recommendation would delegate to the Chief Officer for Growth and Investment and Portfolio Holder for Growth & Investment and Digital & Communications the necessary authorities to enable consultation, submission and the independent examination of the plan to happen. Finally, the report seeks a recommendation to council to approve a clarificatory and updating amendments to the Statement of Community Involvement.</p>
Financial Implications:	<p>The costs of the consultation and local plan examination will be met from within existing budgets. In early 2025 the council received grant funding from the Ministry of Housing, Communities and Local Government of £70,000 for producing Green Belt evidence and £227,962 for producing local plan evidence.</p>
Risk Management/Health and Safety Implications:	<p>An updated Local Plan Risk Register was reported to Scrutiny Committee on 16 September 2025: https://rugby.gov.uk/web/guest/l/60895758</p>
Environmental Implications:	<p>A climate change and environmental impact assessment is attached as Appendix 9. The proposed submission local plan is supported by a sustainability appraisal (Appendix 3) prepared as required by Section 19(5) of the Planning and Compulsory Purchase Act 2004 and a Habitat Regulations Assessment (Appendix 4). The Sustainability Appraisal also meets the requirement for a strategic environmental assessment in accordance with The Environmental Assessment of Plans and Programmes Regulations 2004.</p>
Legal Implications:	<p>The consultation on the Preferred Option Local Plan would be undertaken under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. It is proposed that the plan is then submitted to the Secretary of State for independent examination in accordance with Regulation 22 and Section 20 of the Planning and Compulsory Purchase Act 2004.</p> <p>The purpose of the independent examination is to determine whether the local plan satisfies the relevant legal requirements of the 2004 Act and</p>

2012 Regulations and whether it is 'sound'. The assessment of soundness is made having regard to government planning policy and guidance. The tests of soundness are set out in paragraph 36 of the National Planning Policy Framework. To paraphrase, they are that the plan is

- i) positively prepared (i.e. meets assessed development needs);
- ii) is justified as an appropriate strategy taking account of reasonable alternatives and based on proportionate evidence;
- iii) is effective i.e. deliverable over the plan period; and
- iv) is consistent with national policy.

Only after planning inspector(s) appointed by the Secretary of State have completed independent examination and found the plan to meet the legal requirements and to be sound can it be adopted by the council.

If the plan is found sound and is adopted by the council, the new Local Plan would supersede the existing Local Plan 2011-2031 (adopted 2019).

Equality and Diversity:

An Equalities Impact Assessment has been prepared. This is attached as appendix 6.

Options:

No alternative options have been identified that would have good prospects of enabling the council to meet the 31 December 2026 deadline for submitting a new local plan for examination under the current plan-making system.

If the proposed submission Local Plan is not approved for consultation at the Council meeting on 21 January 2026, that consultation would be unable to take place prior to the pre-election period for May 2026 local elections, which starts in late March 2026.

Following the May election there would be limited time available for a new council to review the plan and commence the statutory consultation process and then submit the plan to the Secretary of State.

The government has confirmed that, if a plan prepared under the current regulations is not submitted by the December 2026 deadline, the council cannot simply switch to the new regulations. It would need to start plan making

again from the beginning under the new regulations.

Therefore, if the recommendation is not approved and the 31 December 2026 deadline is not met, there would be insufficient time between 1 January 2027 and the local government reorganisation date in Warwickshire of 1 April 2028 for a plan to be prepared under the new regulations. That 15 month period would not be sufficient as the new plan-making system sets a timetable of 30 months for preparing a plan.

If the 31 December 2026 deadline is not met, a new plan for Rugby Borough would not be able to be put in place prior to local government reorganisation. A successor unitary authority would then under Regulation 19 of The Local Government (Structural Changes) (Transitional Arrangements) (No. 2) Regulations 2008 as amended by The Local Government (Structural Changes) (General) (Amendment) Regulations 2018 be required to adopt a local plan for the whole of its area within a period of five years starting with the reorganisation date.

Neither of the recently reorganised Northamptonshire unitary councils will meet that five year deadline, so it is not guaranteed that a new Warwickshire unitary/ies would. The new plan-making system with its goal of speeding up plan-making would increase the likelihood of a new unitary meeting the deadline.

The most realistic alternative to the recommendation, therefore, would be continuing with the 2011-2031 local plan (adopted 2019) until the successor unitary authority adopts a new local plan in 2033 or later. The existing plan would become increasingly out-of-date meaning it would be given less weight in decision making and would mean that the “tilted balance” would remain engaged where by the Council’s ability to control where new development occurs is weakened as the harm has to significantly and demonstrably outweigh the benefits.

Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT –

- (1) The proposed submission draft Local Plan (appendix 1) together with the proposed submission policies map (appendix 2),

Sustainability Appraisal report (appendix 3), Habitats Regulation Assessment (appendix 4), Consultation Statement (appendix 5), and Equalities Impact Assessment (appendix 6) and the supporting evidence base (together the “proposed submission documents”) are approved for a six week public consultation in accordance with Regulation 19 of the Town and County Planning (Local Planning) (England) Regulation 2012.

- (2) Delegated authority be given to the Chief Officer for Growth and Investment to make minor amendments and corrections as necessary to the proposed submission documents prior to the commencement of the public consultation.
- (3) Delegated authority be given to the Chief Officer for Growth and Investment to, in liaison with the Portfolio Holder for Growth & Investment and Digital & Communications, agree a list of locations for in-person consultation events.
- (4) Following close of the Regulation 19 consultation, delegated authority be given to the Chief Officer for Growth and Investment in consultation with the Portfolio Holder for Growth & Investment and Digital & Communication to submit to the Secretary of State for independent examination the Proposed Submission Local Plan and the other proposed submission documents, together with the Regulation 19 representations and a summary of the main issues raised in those representations.
- (5) Delegated authority be given to the Chief Officer for Growth and Investment to (if required) prepare a list of proposed changes to the plan needed to address issues raised in the Regulation 19 consultation responses and submit the same to the Secretary of State.
- (6) Delegated authority be given to the Chief Officer for Growth and Investment in consultation with the Portfolio Holder for Growth & Investment and Digital & Communications to:

- a. Produce supplementary information that may be required as part of the examination process to address issues of soundness or legal compliance, including agreeing statements of common ground with other organisations;
- b. Correspond with the Planning Inspector(s) on behalf of the council for the purposes of conducting the examination and addressing issues of legal compliance and soundness;
- c. Propose additional (minor) modifications to the Proposed Submission Local Plan to address issues raised during the examination;
- d. If necessary, request under s20(7C) that the inspector(s) examining the plan recommends main modifications to the plan necessary to resolve issues of soundness or legal compliance, and (where appropriate) suggest main modification needed to address those issues.
- e. Agree any main modifications recommended by the Inspector(s) and undertake a six-week public consultation on those modifications.

(7) The amended Statement of Community Involvement 2026 (Appendix 7) be adopted.

**Reasons for
Recommendation:**

The Council's Local Plan 2011-2031 adopted 2019 is now more than five years post adoption. This means that some of its policies are now deemed 'out of date' for decision making and given less weight. The Government has set out its goal for all authorities to put in place an up-to-date local plan.

On 27 November 2025 the Minister of State for Housing and Planning made a statement to Parliament on the implementation of plan-making reforms under the Levelling Up and Regeneration Act 2023. That statement confirmed the government's intention to bring forward regulations which will set the final date for submission of plans

for examination under the current plan-making system as 31 December 2026.

Recommendations (1) to (5) approve the necessary steps to consult on the proposed submission Local Plan and then submit it for examination to meet that deadline.

Recommendation (6) would give the Chief Officer for Growth and Investment the necessary delegated authorities to allow the council to then participate in the independent examination of the local plan.

Following that examination, if the plan were to be found sound and legally compliant, it would return to Council for adoption.

Finally, recommendation (7) would approve minor updates to the Statement of Community Involvement to remove an unclarity about the circumstances in which representations need to be made available for public inspection and to make other minor updates to the document.

Cabinet - 6 January 2026

**Rugby Borough Local Plan 2025-2042 Regulation 19 Consultation
and submission**

Public Report of the Chief Officer - Growth and Investment

Recommendation

IT BE RECOMMENDED TO COUNCIL THAT –

- (1) The proposed submission draft Local Plan (appendix 1) together with the proposed submission policies map (appendix 2), Sustainability Appraisal report (appendix 3), Habitats Regulation Assessment (appendix 4), Consultation Statement (appendix 5), and Equalities Impact Assessment (appendix 6) and the supporting evidence base (together the “proposed submission documents”) are approved for a six week public consultation in accordance with Regulation 19 of the Town and County Planning (Local Planning) (England) Regulation 2012.
- (2) Delegated authority be given to the Chief Officer for Growth and Investment to make minor amendments and corrections as necessary to the proposed submission documents prior to the commencement of the public consultation.
- (3) Delegated authority be given to the Chief Officer for Growth and Investment to, in consultation with the Portfolio Holder for Growth & Investment and Digital & Communications, agree a list of locations for in-person consultation events.
- (4) Following close of the Regulation 19 consultation, delegated authority be given to the Chief Officer for Growth and Investment in consultation with the Portfolio Holder for Growth & Investment and Digital & Communication to submit to the Secretary of State for independent examination the Proposed Submission Local Plan and the other proposed submission documents, together with the Regulation 19 representations and a summary of the main issues raised in those representations.
- (5) Delegated authority be given to the Chief Officer for Growth and Investment to (if required) prepare a list of proposed changes to the plan needed to address issues raised in the Regulation 19 consultation responses and submit the same to the Secretary of State.
- (6) Delegated authority be given to the Chief Officer for Growth and Investment in consultation with the Portfolio Holder for Growth & Investment and Digital and Communications to:

- a. Produce supplementary information that may be required as part of the examination process to address issues of soundness or legal compliance, including agreeing statements of common ground with other organisations;
- b. Correspond with the Planning Inspector(s) on behalf of the council for the purposes of conducting the examination and addressing issues of legal compliance and soundness;
- c. Propose additional (minor) modifications to the Proposed Submission Local Plan to address issues raised during the examination;
- d. If necessary, request under s20(7C) that the inspector(s) examining the plan recommend main modifications to the plan necessary to resolve issues of soundness or legal compliance, and (where appropriate) suggest main modification needed to address those issues.
- e. Agree any main modifications recommended by the Inspector(s) and undertake a six-week public consultation on those modifications.

(7) The amended Statement of Community Involvement 2026 (Appendix 7) be adopted.

1 Executive Summary

- 1.1 The Council's Local Plan 2011-2031 adopted 2019 is now more than five years post adoption. This means that some of its policies are now deemed 'out of date' for decision making and given less weight. The Government has set out its goal for all authorities to put in place an up-to-date local plan.
- 1.2 On 27 November 2025 the Minister of State for Housing and Planning made a statement to Parliament on the implementation of plan-making reforms under the Levelling Up and Regeneration Act 2023. That statement confirmed the government's intention to bring forward regulations which will set the final date for submission of plans for examination under the current plan-making system as 31 December 2026.
- 1.3 Recommendations (1) to (5) approve the necessary steps to consult on the proposed submission Local Plan and then submit it for examination to meet that deadline.
- 1.4 Recommendation (6) would give the Chief Officer for Growth and Investment the necessary delegated authorities to allow the council to then participate in the independent examination of the local plan.
- 1.5 Following that examination, if the plan were to be found sound and legally compliant, it would return to Council for adoption.
- 1.6 Finally, recommendation (7) would approve minor updates to the Statement of Community Involvement to remove an unclarity about the circumstances in which

representations need to be made available for public inspection and to make other minor updates to the document.

- 1.7 Section 3 below provides background on plan-making activities to date and Section 4 brings that up to date by detailing the Regulation 18 consultation completed in spring 2025.
- 1.8 Sections 5-11 then summarise some of the main changes to the Local Plan made between the Preferred Options document consulted on in spring 2025 and the Proposed Submission version proposed to be consulted on now. The reasons for those changes, including new evidence gathered, are summarised.
- 1.9 Section 12 details the consideration of some of the main alternative site options that have not been included in the Proposed Submission Local Plan.
- 1.10 Section 13 summarises the proposed Gypsy and Traveller allocations.
- 1.11 Section 15 summarises the position in relation to infrastructure provision.
- 1.12 Section 15 provides an overview of some of the new development management policies included in the Proposed Submission Local Plan.
- 1.13 Section 16 details the proposals for the public consultation and stages thereafter.
- 1.14 Section 17 details the proposed amendment to the Statement of Community Involvement.

2. Appendices

2.1 This report includes the following appendices:

- Appendix 1 – Proposed submission draft Local Plan
- Appendix 2 – Proposed submission policies map
- Appendix 3 – Sustainability Appraisal report (to follow on 22.12.2025)
- Appendix 4 – Habitats Regulation Assessment
- Appendix 5 – Consultation Statement (circulated separately)
- Appendix 6 – Equality Impact Assessment
- Appendix 7 – Statement of Community Involvement 2026
- Appendix 8 – Summary of proposed amendments to the Statement of Community Involvement
- Appendix 9 – Climate change and environmental impact assessment
- Appendix 10 – Communications plan

3 Background

- 3.1 On 14 December 2022 Council agreed to proceed with a full update to the Local Plan. Between 30 October 2023 and 2 February 2024 an “Issues and Options” consultation was held.
- 3.2 On 19 March 2025 Council approved a further “preferred options consultation” which took place between Monday 24 March 2025 and Monday 19 May 2025.
- 3.3 On 16 October 2024 Council approved an updated Local Development Scheme (see background documents) setting out the timetable for production of the new local plan. The next stage in that timetable is the pre-submission (Regulation 19) consultation in January 2026. Thereafter submission of the plan for examination is timetabled for June 2026.

4 Preferred options consultation

- 4.1 The preferred options consultation took place for eight weeks between Monday 24 March 2025 and Monday 19 May 2025. In person, evening drop-in consultation events were held in Stretton-on-Dunsmore, Dunchurch, Clifton upon Dunsmore, The Benn Hall, Long Lawford, Brinklow and Wolvey.
- 4.2 4848 responses were received to the consultation. The consultation responses received are summarised in the Consultation Statement at Appendix 5. Copies of those responses received from organisations and site promoters are published on the Council's website on the following link: <https://www.rugby.gov.uk/w/local-plan-evidence-base#preferred-options-consultation-responses> .
- 4.3 The preferred options consultation was a second consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This was a consultation undertaken during plan-making rather than at its conclusion. Officers explained during the consultation events that it was a genuine consultation and was on a direction of travel rather than a finished plan. The consultation was undertaken while important evidence was still being prepared.
- 4.4 Evidence gathering continued over the summer and into the autumn and officers and members reflected upon responses to the consultation. The following sections detail changes to the Preferred option consultation document that have been made in the Proposed Submission Local Plan (Appendix 1).

5 Plan period and whole plan supply buffer

- 5.1 The National Planning Policy Framework states that local plans should look ahead over a minimum of 15 years from adoption. The preferred options document proposed a plan end date of 2045. Several responses to the consultation argued that the plan period should be reduced to reduce the number of new homes that need to be planned for now.
- 5.2 One argument for a shorter plan period is that decisions about longer-term growth in Rugby Borough would be better taken by a successor unitary authority

after local government reorganisation, informed by the new spatial development strategies introduced under the Planning and Infrastructure Bill 2025.

- 5.3 Additionally, as the proposed residential sites in the Proposed Submission Local Plan do not include large-scale new urban expansion or new settlements, it is unlikely that new housing through the plan – except for the carried forward sites at Houlton and South West Rugby – will be still being built in the 2040s.
- 5.4 Reducing the plan-period also serves to partly counteract the effect of the increase to Rugby Borough's minimum local housing need calculated under the government's standard method in May 2025. The May 2025 recalculation increased need from 618 to 636 new homes per year.
- 5.5 The current Local Plan 2011-2031 requirement is for 663 new homes per year from 2018-2031. Under the standard method operational before the December 2024 update to the NPPF the requirement was for 525 new homes per year. The previous standard method used trends-based projections, in contrast to the current standard method which is stock based with an affordability uplift. The trends for Coventry informing the previous standard method were known to be erroneous and on that basis Coventry and Warwickshire authorities commissioned their own assessment of housing need in the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022. That assessment showed an annual figure of 735 new homes per year for Rugby Borough. That was proposed to be used as the basis for the local plan prior to the publication of the 2024 NPPF. The current nationally set standard method is therefore lower than the current adopted local plan and the HEDNA-evidenced position prior to the 2024 NPPF.
- 5.6 Based on 636 new homes per year, and taking account of the fact that Houlton and South West Rugby will still being built 2042-2045, reducing the plan period by three years reduces the housing requirement needing to be planned for now by approximately 1,000 homes.
- 5.7 The Proposed Submission Local Plan sets the plan period at 2025-2042. This is the shortest plan period that could be proposed. It creates a risk that, if the plan is not adopted before 1 April 2027, the plan would have fewer than 15 years to run on adoption. This means that it is possible that a planning inspector would during the examination require modification of the plan to extend the plan period and ask the council to identify additional sites to deliver the necessary additional supply. Officers would argue that is not necessary, and any shortfall on the 15 years would be so small as to be for all practical purposes immaterial, for example the plan could have 14 years and 11 months to run on adoption.
- 5.8 The shorter plan period creates pressure to submit the plan for examination as soon as possible after the public consultation concludes to increase the chances of the examination being able to complete and the plan be adopted by spring 2027.
- 5.9 The other argument that was made in some responses to the consultation was that the council should identify less headroom or buffer above its minimum housing requirement for the plan period.

- 5.10 National Planning Policy Framework paragraph 36c) sets as part of the test of soundness a requirement that plans are effective i.e. deliverable within the plan period. To ensure the housing requirement is deliverable over the plan period it is necessary to identify more housing land supply than the minimum that would be necessary were all identified sites to be developed in the plan period. This is often referred to as a 'whole plan buffer'.
- 5.11 The whole plan buffer is not the same as the 5% buffer required by NPPF paragraph 78a) in calculating five year housing land supply. The 5% buffer referred to in paragraph 78a) is stated to be "moved forward from later in the plan period" rather than being additional supply.
- 5.12 There is no guidance in the Planning Practice Guidance on the level of whole plan buffer that should be planned for. The buffer provides resilience if during the examination proposed allocations are deleted, their capacity is reduced or a need for increased requirement is identified. Often plans contain a circa 10% supply buffer.
- 5.13 In the preferred options consultation a buffer of 9% was identified. The Proposed Submission Local Plan identifies an 8.5% buffer. It is considered that a less than 10% buffer is justifiable in the context of a plan that does not allocate large scale new housing sites that are challenging to bring forward and have long lead times. Nonetheless, a relatively tight amount of headroom does create risk for the plan examination.

6 Urban capacity

- 6.1 Prioritising brownfield land over greenfield land was first enshrined in planning policy in 2000 when Planning Policy Guidance 3 introduced a sequential test as part of a "brownfield first" approach. This sequential test was removed in 2012 when the National Planning Policy Framework replaced all Planning Policy Guidance Notes however it maintained the principle of encouraging the effective use of brownfield land.
- 6.2 The current Local Plan 2011-2031 adopted June 2019 does not allocate land for housing development within the Rugby urban area nor make any allowance for urban housing to contribute to housing supply over the plan period.
- 6.3 The preferred options consultation put forward two urban sites – Morgan Sindall and the former RBC depot on Albert Street – with a combined capacity for 115 homes as potential allocations. Those sites are carried forward into the Proposed Submission Local Plan.
- 6.4 More land was not put forward as part of the preferred options consultation document because urban land had not been put forward by landowners in response to the call for sites at the 2023-2024 issues and options stage and because decisions about the potential development of council-owned land had not yet been made.
- 6.5 An aspirational potential for up to 2,000 homes in the urban area had been identified in the Rugby Regeneration Strategy 2022. However, that was a theoretical figure predicated upon large scale relocation of existing occupiers

mainly from public sector buildings including the Town Hall, Police Station, Fire Station and doctors' surgeries along with building on all council surface car parks. It also required high density development of around 8-9 storeys on sites such as the former Cemex site and Town Hall site. As local plans need to demonstrate that the development is available, deliverable and viable such an aspiration could not be used as a basis for a local plan.

- 6.6 Nonetheless, officers were clear at the public consultation events that efforts would be made to identify additional urban capacity in line with national policy which seeks to maximise the use of brownfield land. This was done in two ways.
- 6.7 First, reviews of council owned assets has been undertaken including the completion of a review of remaining council owned garage sites which has been ongoing since 2004. These reviews have resulted in proposals for the redevelopment of council-owned land at Rounds Gardens, Westway Car Park and the Town Hall in addition to Albert Street that are now included in the proposed submission plan together with the council-owned garage site at Elizabeth Way, Long Lawford. Other council-owned garage sites were not included because of access constraints, and/or because they would not have the capacity to deliver five or more dwellings however their future development could assist in the provision of additional dwellings as "windfall" housing development.
- 6.8 Second, an Urban Capacity Study (UCS) was undertaken. This study is published as part of the evidence base, available on the following link: <https://www.rugby.gov.uk/w/local-plan-evidence-base>. The UCS has sought to identify additional urban capacity by holding a separate urban call for sites in summer 2025, investigating sites suggested in responses to the preferred options consultation and using mapping and site visits to identify possible sites. Landowners of potentially suitable sites were contacted to establish if land was available.
- 6.9 As a result of the above actions, the urban capacity in the Proposed Submission Local Plan is increased to 703 homes. This reduces the need to identify additional green field land. A full list of urban sites is provided in Policy S6 on page 17 of the plan.
- 6.10 The Town Hall is included as an allocation on the basis that residential redevelopment would occur on the footprint of the existing building at up to five storey heights and that the 'Floreat Rugbeia' Portland stone portico fronting Evreux Way would be retained. The Benn Hall, Lawn and Retreat and Benn Hall car park would also be retained. It is still envisaged that there will be a base for council services in the town centre that residents can access however there are other sites within the town centre that could deliver this function including co-locating with the planned £10m training and skills hub which has been secured through S106 funding. In the trajectory, no completions are assumed on the Town Hall site until 2036-7 allowing the disposal of the site to happen after local government reorganisation is complete.
- 6.11 The Town Hall is allocated for redevelopment on the basis that the future unitary council and future Rugby town council would both occupy smaller alternative premises in the town. The public areas of the town hall are likely of inadequate

size for meetings of a new unitary council to be conducted there and are conversely likely too large for a future town council. The buildings are also substandard in terms of their provision for disability access. The non-public facing office areas of the building are tired and similarly do not meet modern office standards.

- 6.12 Both land north of Rounds Gardens (controlled by Miller Homes) and Round Gardens south (owned by RBC) are included as proposed allocations. The development parameters for these sites would ensure retention of mature TPO trees and deliver a mix of new housing and public open space. Importantly, the capacity figures for these sites are reached based on place-making considerations rather than with the objective of ‘town cramming’ which resulted in the refusal of the scheme on the land controlled by Miller Homes which is the subject of a Planning Inquiry to be held in January 2026.

7 New evidence

- 7.1 As noted above, at the time of the preferred options consultation, several evidence studies were still in preparation. The evidence base for the Proposed Submission Local Plan is now published on the following link: <https://www.rugby.gov.uk/w/local-plan-evidence-base>.
- 7.2 The evidence base is extensive and is not all listed here but is available on the Council’s website. In addition to the Urban Capacity Study mentioned above, new evidence documents include (amongst others) the Strategic Transport Assessment, Water Cycle Study, Education Topic Paper and Green Belt study (stages 1 and 2).
- 7.3 The Green Belt studies warrant specific mention. Green Belt is a policy designation in local plans. The Green Belt in Warwickshire was first designated in 1975 and has been re-designated – sometimes with amendments – in successive local plans (at other points structure plans and core strategies) since then. It is not a landscape or environmental quality designation. Its purpose is, essentially, urban containment and the prevention of sprawl.
- 7.4 National policy and guidance requires authorities to prepare updated Green Belt studies which, in accordance with the 2024 NPPF, identify areas that meet the new definition of ‘Grey Belt’. The published Green Belt studies do that. The studies have been independently prepared by consultants Land Use Consultants (LUC) based on the application of government policy and guidance. LUC have a long track record of preparing Green Belt studies including the Green Belt evidence that supported the 2019 Local Plan. Importantly, the studies are independent evidence and not the policy of the council. They have not been, nor should they be, subject to member input. The Green Belt studies, once published, have immediate implications for development management decisions.
- 7.5 Grey Belt is required to be defined based on the strength of the contribution that land makes to Green Belt purposes (A) checking the unrestricted sprawl of large built-up areas; (B) preventing neighbouring towns merging into one another; and (D) preserving the setting and special character of historic towns. Government guidance is clear that villages are not “towns” or “large built-up areas” for purposes (A), (B) and (D).

- 7.6 Unless land is identified, applying government guidance, as making a strong contribution to purposes (A), (B) or (D) it is required to be provisionally defined as Grey Belt.
- 7.7 Because of the large distance between Rugby and Coventry/Nuneaton/Bedworth/ Hinckley, purpose (B) is only relevant to the northwestern corner of the borough between Hinckley and Nuneaton/Bedworth. Similarly, purpose (D) is not relevant to the borough because its Green Belt does not form part of the setting of historic parts of the surrounding towns.
- 7.8 Therefore, the main purpose to be used in defining Grey Belt is purpose (A). Those parts of the borough that are not close the edge of the defined large built-up areas of Rugby, Coventry/Nuneaton/Bedworth/Hinckley and Magna Park are likely to be defined as Grey Belt.
- 7.9 The areas identified as Grey Belt in the studies are identified as provisionally Grey Belt, because national policy requires, in deciding whether land is Grey Belt, a determination of whether other national policies on ecology, flood risk and heritage assets would provide a strong reason for refusing or restricting development. That assessment cannot be made in a borough-wide study and would need to be made at the planning application stage.
- 7.10 The relevance of Grey Belt to plan-making is that when releasing Green Belt land for development, Grey Belt should be prioritised. In the Proposed Submission Local Plan all proposed Green Belt allocations are Grey Belt except for proposed residential allocations at Long Lawford, the Gypsy and Traveller allocation at Wilsher Ranch, Shilton Lane and employment allocations at Walsgrave Hill/Ansty Park on the edge of Coventry. The Walsgrave Hill allocation includes a Gypsy and Traveller site but on a part of the site identified as provisionally Grey Belt.
- 7.11 The Green Belt Exceptional Circumstances Topic Paper in the evidence base pages linked to above provides a detailed explanation of the reasoning for releasing Green Belt land for development.
- 7.12 For development management purposes, the definition of land as Grey Belt does not imply that planning permission will be granted for its development. Paragraph 155 of the NPPF sets out how proposals for development of Grey Belt land should be considered in the development management process. Planning committee is advised on this where relevant to individual planning applications. However, Grey Belt national policy does weaken the constraint on development in parts of the Green Belt that aren't strongly contributing to purposes (A), (B) or (D).

8 New designations

- 8.1 The Proposed Submission Local Plan and Policies Map (Appendix 2) includes new proposed designations as follows:
- i) Areas of separation are defined between the urban edge of Rugby and the settlements of Clifton upon Dunsmore and Dunchurch and Thurlaston. These areas are justified in an Areas of Separation Paper which forms

part of the evidence base. Given the scale of development planned under the 2019 Local Plan south west of Rugby, coalescence between Rugby and the villages of Dunchurch and Thurlaston is a concern for residents. Similarly, Clifton upon Dunsmore faces significant development pressure which could diminish its character as a nucleated hilltop village. In contrast to other parts of the borough, the countryside around these villages is not designated as Green Belt and there would not be grounds for designating new Green Belt there. Their distinct identities as villages is important to the character of all three villages and it is considered necessary to create a local separation designation to seek to avoid coalescence.

- ii) Rainsbrook Valley “landscape of elevated sensitivity” south of Rugby/Hillmorton. The justification for this local landscape designations is set out in a report on the landscape sensitivity of the valley which forms part of the evidence base.

9 Changes to spatial strategy – residential

9.1 The truncation of the plan period to 2042, together with the identification of additional urban capacity as detailed above, allow the reduction of greenfield and Green Belt housing allocations in the plan. The headline changes are as follows:

- i) Land south of Rugby Road, Brinklow is reduced in capacity from 340 to 250 homes to enable development to avoid the more historically sensitive eastern field. The western field would be to the rear of twentieth century housing on Heath Lane. The 75 homes proposed in the preferred options at West Farm and Home Farm are retained but would be restricted to be bungalows or older persons’ housing. This reduces the number of new homes planned at the village to 325 homes.
- ii) New greenfield housing sites south of Coventry Road in Dunchurch are removed. This change reflects significant concerns raised in the consultation about the cumulative scale of development at Dunchurch considering the development at South West Rugby. These sites also now form part of the area of separation (see above).
- iii) New greenfield housing sites on the southern edge of Hillmorton at Kilsby Lane and Barby Lane, which were identified in the preferred options consultation document, are removed. Those locations now form part of the Rainsbrook Valley Landscape of Elevated Sensitivity.
- iv) The proposed development of council-owned public open space at Lea Crescent, Newbold-on-Avon is removed. This area will remain as public open space.
- v) The proposed allocation on Newton Manor Lane, Rugby is increased in capacity from 240 homes to 285 homes, a density that will still support significant green space. The proposed safeguarding of school land adjacent to this site is removed (on this see section 14 below).

- vi) Elsewhere in Rugby, the proposed allocation at Fenley Fields, Cawston is removed owing to changes over the land's availability following Old Laurentians Rugby Club taking out a new 35 year lease.
- vii) At Stretton-on-Dunsmore, a proposed new allocation to the north of the school playing field accessed from School Lane (70 homes) is substituted for the previously proposed allocation of land north of Plott Lane (125 homes). This reduces the number of new homes planned at the village to 118 homes. Concerns have been raised about the narrow access from Plott Lane west of Squires Road. By contrast, development accessed from School Lane would overcome this issue. An allocation for 40 homes west of Fosse Way is retained. Warwickshire County Council Archaeology expressed concerns about the potential for medieval remains on this site, but a geophysical survey supplied by the site promoter indicates that the nature of remains would not prevent development.
- viii) At Wolvey, the proposed allocation south of Leicester Road is removed, while the allocation at Coventry Road, Wolvey is reduced in scale from 500 homes to 60 homes. This reduces the number of new homes planned at the village to 210. The allocation south of Leicester Road was more removed from the village centre in comparison to other site options and has greater historical sensitivity given its proximity to St John the Baptist Church. Additionally, the proposed off-road walking route from land south of Leicester Road to the village centre crosses the River Anker floodplain and so would be unlikely to be a year-round option.

9.2 Alongside these reductions and changes, new site allocations are also put forward in the proposed submission plan:

- i) The partly-brownfield former Oakdale Nursery, Bandon for 43 homes;
- ii) Land north Warwick Road, Wolston for 80 homes which, in view of primary school capacity constraints, would be limited to older persons' accommodation or bungalows.
- iii) Lawford Felds Farm, Long Lawford for 250 homes.

9.3 The additional allocation at Long Lawford would, together with the allocation of 400 homes retained from the preferred options, bring the total number of new homes planned south of the village to 650. This is the largest number of new homes proposed outside of Rugby in the plan. Long Lawford is close to Rugby and has superior public transport to other main rural settlements. It also has projected primary school capacity to accommodate new homes. The new site at Lawford Fields Farm would facilitate the creation of a safe walking and cycling route between the village and Bilton, linking to Bilton Secondary School. It would also deliver a significant new area of public open space which could be delivered as playing fields, sports provision or other outdoor recreation facilities.

9.4 In view of the challenges in delivering the large site proposals put forward (on this see section 12 below) there was an is a rationale for planning a larger scale of growth at a main rural settlement rather than seeking to spread new housing as thinly as possible in the rural areas. The rationale for a higher scale of growth

is to seek to utilise existing infrastructure and deliver new infrastructure which can increase rural sustainability.

- 9.5 In the Regulation 18 consultation, Wolvey was identified as a potential location for larger scale growth. However further investigation has given rise to questions as to how development at the village could deliver the step change in local facilities and services that would justify making this a focal point for rural development.
- 9.6 In contrast to Wolvey, Long Lawford is close to Rugby and benefits from much stronger public transport links and the potential to deliver active travel links. This makes it a more sustainable location for a larger scale of growth. Indeed Long Lawford is closer to central Rugby and has a better bus service than some suburbs of the town. There is potential for the new development to deliver new convenience retail and new space for community use, together with the link to Bilton and public open space mentioned above.
- 9.7 In some responses to the preferred options consultation the proposed spatial strategy for housing was characterised as “dispersal” of new housing away from the town of rugby into the rural areas. This is not accurate. More than 75% of new housing to be built between 2025 and 2042 will be built within or in expansions to the town of Rugby, including the urban extensions of Houlton and South West Rugby. The actual strategy for dispersal is about spreading development across multiple smaller sites within the town of Rugby and in main rural settlements rather than another new large urban expansion. This strategy is important to ensure that the Council can maintain a 5 year housing supply of developable sites as smaller sites are more deliverable and come forward more quickly. The reliance on two large sites in the current plan at Houlton and South West Rugby is a key reason why the council no longer has a 5 year housing land supply.

10 Changes to spatial strategy – employment

- 10.1 The primary change to employment land allocations made in the Proposed Submission Local Plan in comparison to the preferred options consultation is the removal of the proposed land allocation at Prologis Park West/Mountpark, Ryton-on-Dunsmore and its replacement with Land at Walsgrave Hill on the edge of Coventry.
- 10.2 This change responds to the findings of the Strategic Transport Assessment, which identified the potential for the Prologis Park West/Mountpark allocation to have a significant adverse impact on queuing at the Tollbar End A45/A46 interchange. By contrast, the highways impacts of the allocation at Walsgrave Hill, which would be accessed from the proposed new Walsgrave junction, would be less significant. Given Tollbar End forms part of the Strategic Road Network officers do not advise proceeding with an allocation which is modelled to have a significant adverse impact with no clear mitigation.
- 10.3 The proposed employment allocation at Walsgrave Hill would deliver a 75 hectare country park as a buffer to Coombe Abbey County Park, a new blue-light

route for ambulances from the new Walsgrave Junction to University Hospital Coventry and Warwickshire, and a new walking and cycling route between the site and Coventry. The creation of a very light rail route through the site between University Hospital and Ansty Park is an aspiration of Coventry City Council and a route for this would be safeguarded. The site would also deliver an 8 pitch Gypsy and Traveller site.

- 10.4 There is risk in the Walsgrave Hill allocation because of its proximity to heritage and ecology constraints at Coombe Abbey which is a Grade II* listed registered park and garden and includes a site of special scientific interest. The site promoter has sought to reduce this impact by providing the intervening 75ha country park 'buffer' area, which is reflected in the Proposed Submission Local Plan.

11 Coton Park East and South West Rugby employment land phase 2

- 11.1 Some responses to the preferred options consultation argued that both Coton Park East and the land safeguarded to meet future development needs at South West Rugby should be allocated for residential development rather than for employment development as proposed.

- 11.2 The remaining undeveloped part of Coton Park East was allocated for residential development in the Rugby Borough Local Plan 2011-2031 and has an outline planning permission for 475 dwelling and land for a primary school granted on 26 April 2023.

- 11.3 Several responses to the consultation referred to the safeguarding of land within that site for a secondary school as part of the Local Plan 2011-2031 allocation. For clarity, it is worth repeating the relevant text of Policy DS7 (Coton Park East) of the plan here:

“Secondary school provision for Coton Park East is to be provided off-site through the expansion of existing secondary schools in Rugby (...) However, in order to safeguard provision for the eventuality that the capacity is not available at existing schools, an 8.5ha parcel of land is to be reserved on-site for a combined primary and secondary school. (...) The 8.5ha parcel will be reserved for a period of 12-24 months from the date of Local Plan adoption. After this time if the local planning authority does not require the land for a secondary school the land will be released for provision of the primary school and for residential use.”

- 11.4 The 12-24 month school site safeguarding period was not included in the plan submitted by Rugby Borough Council for examination. This was added by the Inspector as a main modification. The area to be safeguarded was not precisely shown on the local plan policies map but was noted in the Inspector's Report to be 8.5ha in area. The subsequently adopted Coton Park East Masterplan Supplementary Planning Document (17 December 2019) showed an area in the north east of the site, adjacent the M6 and Newton Lane as the secondary school site.

- 11.5 The safeguarding was to be for a maximum of 24 months from adoption of the plan on 4 June 2019 i.e. until 4 June 2021. At that point the safeguarding expired.

- 11.6 On 17 December 2019 the landowner submitted its residential outline planning application and on 26 April 2023 outline planning permission was granted. Under the section 106 agreement dated 26 April 2023 land was to be safeguarded for secondary school provision for a period of three years after adoption of the local plan i.e. until June 2022, after which point it would be released for residential development. That obligation had already expired and was obsolete before the agreement was completed. In effect, the obligation was not proceeded with.
- 11.7 The area of land subject to the defunct safeguarding provisions of the s106 agreement was not the same as the area shown in the Masterplan SPD. Instead, it was a 3.45ha area in the south west of the site, bisected by the site spine road. The site appears inadequate to accommodate a secondary school which would usually require a site size of circa 9ha.
- 11.8 Irrespective, that 3.45ha area of land is no longer and indeed never was safeguarded for secondary school purposes. This means that, were the site to be developed in accordance with the extant planning permission for residential development, housing would be built on this part of the site.
- 11.9 Ultimately in the 2 years between June 2019 to June 2021 that the safeguarding of secondary school land was in place, the decision as to whether to proceed with acquiring land for these purposes rested with Warwickshire County Council as Local Education Authority (LEA).
- 11.10 The Department for Education requires evidence that a new school will have a viable and sustainable number of pupils from its first day of operation before it will grant the LEA permission to open it. Were the County Council to spend at risk and seek to proceed with opening a new school without confidence that it would be viable and sustainable from day one, that would expose taxpayers to significant financial risk. The LEA evidently concluded in 2019-2021 that there was not a case for opening a new school at Coton Park East, a position that was consistent with Local Plan Policy DS7 and its stance in the 2018 Local Plan examination.
- 11.11 Independent evidence commissioned by RBC and produced for the new local plan, as detailed in section 13 below, supports that position.
- 11.12 Despite the 2019 residential land allocation and the 2023 planning permission, the site has not come forward for residential development.
- 11.13 Then, in response to the call for sites as part of the Issues and Options Consultation in January 2024 the site was put forward by the landowner for employment development. The landowner cited a lack of interest from residential developers in acquiring the site and the (likely linked) fact that the site is accessed through an existing industrial area and adjacent to the M6 motorway.
- 11.14 The site is now promoted by specialist employment developer Panattoni, which is preparing a planning application and recently conducted pre-application public consultation in the area.

- 11.15 In February 2025 the landowner submitted reserved matters for infrastructure works pursuant to the residential outline planning permission. Some responses to the preferred options consultation interpreted this as evidence of the landowner's intention to proceed with the residential permission. However, that is not correct.
- 11.16 Under condition 2 of the residential outline planning permission the applicant is required to submit its first application for approval of reserved matters before the expiry of three years following the grant of permission. Therefore, the submission of the first reserved matters is a necessary step to keep the residential planning permission alive. The landowner's planning agent has advised that it wishes to keep that planning permission alive so that the vehicle movements associated with the residential permission – which would be greater than for employment development – are a “fallback position” when the local highways authority comes to assess the employment planning application.
- 11.17 Officers' advice is that in such circumstances it would be difficult for the council to demonstrate that Coton Park East is a deliverable residential allocation. This position was confirmed in advice from the Planning Inspector following a monitoring visit in June 2025 in which he indicated that where the local authority wishes to allocate land for a use for which the landowner has indicated it is not available, it needs to demonstrate that it has a way to bring that land forward for its intended use. That requires funds for and a willingness to use compulsory purchase powers. Given the high development value of the land in question, the use compulsory purchase powers is not a realistic option.
- 11.18 These challenges are not, however, the only reasons why redesignation of the land for employment purposes is proposed. There are also strong planning reasons why the site is more suitable for employment development than it is for residential.
- 11.19 The site is close for M6 J1 and is accessed through an industrial estate. It is the last parcel of potential employment land south of M6 J1 and the evidence base shows high demand for employment land. Officers' advice is that this is the best located potential employment site option at Rugby. There are fewer options for where we can locate employment land in comparison to housing, because employment land needs to be close to motorway and A road junctions to make it commercially attractive to occupiers and to reduce commercial vehicles routing through residential areas.
- 11.20 Finally, the site promoters are willing to deliver part of the development smaller business units – for which there is need – and will allow existing Rugby businesses grow on space to expand. The site promoter are also willing to provide land for playing fields for Rugby Free Primary School and meetings have been held with the school to discuss this further.
- 11.21 Concerns have also been expressed about the impact on surrounding residential properties from employment uses on this site. The local plan allocates land uses it does not determine the detailed layout of sites this is dealt with at the planning application stage. The policy associated with this allocation secures lorry parking and land for playing field for Rugby Free School, as these are land uses. The playing field is required by the policy to be immediately adjacent to the

school and the policy also requires smaller employment buildings to be located in the south west of the site to reduce the impact on adjacent homes. Final site layout, including buffers and open space and any necessary mitigation measures would be secured as part of a future planning application when detailed design works, informed by specialist surveys, have been undertaken.

- 11.22 Turning to the land at South West Rugby, this formed part of the South West Rugby site allocation made in the 2019 Local Plan. It was safeguarded not against development, but for development after 2031 to meet future development needs. As with Coton Park East, the land was put forward in the 2023-2024 call for sites for employment development and is now the subject to a planning application for employment development.
- 11.23 This means that similar circumstances to Coton Park East pertain. It would be very difficult for the council to demonstrate in a Local Plan Examination that this is a deliverable residential site.
- 11.24 As with Coton Park East, however, there are also clear planning reasons supporting allocation of the land for employment use. The site is at the M45/A45 Thurlaston Interchange and would be an extension to the existing Symmetry Park. It would be difficult to develop employment land at the Blue Boar Interchange given capacity issues at that junction. This means that M6 Junction 1 and the Thurlaston Interchange are the two main Strategic Road Network junctions within the borough serving the town of Rugby. This makes these junctions, in principle, the most appropriate locations for new employment land at the town.
- 11.25 Furthermore, given the scale of the completed employment buildings to the south and the need to maintain separation from the ancient woodland to the north, the suitability of the South West Rugby safeguarded site for residential development is now questionable. Creating a successful interface with both the existing employment land and the woodland would be challenging for a residential proposal
- 11.26 The development of the safeguarded land would assist the viability of the wider South West Rugby development, which is experiencing viability challenges. Development of this land would help by providing more development value to contribute to the site-wide infrastructure bill.
- 11.27 The allocation in the Proposed Submission Local Plan of the phase 2 South West Rugby also proposes a developable area to ensure that future development provides visual separation to the Ancient Woodland. Additional controls for the build out of this area are set out within the South West Rugby Design Code which was adopted earlier this year. The developable area results in a provision of employment land of up to 60,000sqm of floorspace which is considerably less floorspace than is proposed in the current planning application for this site. This reduction in floorspace and decreased developable areas is necessary to achieve adequate green buffers to the Cawston Spinney Ancient Woodland to the north of the site. The consideration of the planning application is in its early stages and may require further amendments within the developable area following responses on landscape, ecology and arboriculture. These are matters however for the planning application process and not the local plan.

12 Consideration of omission sites and alternatives

- 12.1 As is detailed above, the plan is supported by an extensive evidence base. Much of this evidence is focused on evaluating potential site options and spatial strategies for accommodating the necessary new housing and employment land.
- 12.2 Reasonable alternatives to the Local Plan strategy need to be considered to demonstrate that the plan is justified, part of the NPPF's soundness test, and under Regulation 12(2) of The Environmental Assessment of Plans and Programmes Regulations 2004. As changes to Green Belt boundaries are proposed, it is also necessary under NPPF paragraph 147 to demonstrate that all other reasonable options for meeting the identified development needs have been fully examined before it can be concluded that exceptional circumstances justifying the Green Belt changes exist.
- 12.3 This process of considering site options through plan preparation is summarised in the Spatial Strategy and Site Selection Methodology Topic Paper and explained in greater detail in the Sustainability Appraisal, Stage 2 Site Assessment Report and Green Belt Exception Circumstances Topic Paper (all included within the evidence base).
- 12.4 Particular attention has been given to considering alternative large site options which would mean a different overall spatial strategy for meeting identified development needs.
- 12.5 Two large-scale alternative housing site options were highlighted at Regulation 18 stage:
- i) A proposal for a new settlement of 2,680 homes at on the A46 at Lodge Farm between Dunchurch and Daventry; and
 - ii) A proposal for 3,720 homes to the north west of Rugby between Cosford and Newbold-on-Avon.
- 12.6 Given the prominence of these two sites in public debates around the plan, the reasons why they do not form part of the Proposed Submission Local Plan are summarised here.
- 12.7 For both Lodge Farm and Cosford a cautious but realistic trajectory is assumed based on national research on delivery rates. This indicates that on either site approximately 1,088 new homes could be delivered by 2042. A realistic trajectory is necessary to avoid the mistake made in preparation of the 2011-2031 Local Plan which included an overly optimistic build trajectory for South West Rugby. That overly optimistic trajectory is the main explanation for why the Council is currently unable to demonstrate a five year housing land supply.
- 12.8 Lodge Farm, despite it not being a preferred option, attracted more public opposition than any other potential site option at the Regulation 18 stage, generating more than 1,000 letters of objection.
- 12.9 Lodge Farm was included in the proposed submission version of the Rugby Borough Local Plan 2011-2031 as a proposal for 1,500 dwellings. In the report

on the Local Plan examination dated 27 March 2019 Inspector Mike Hayden concluded that the site was not justified or effective or consistent with national policy on the delivery of sustainable development and so proposed main modifications to delete the allocation.

- 12.10 To seek to address the objections raised during the last examination, the site promoter has increased the scale of the site and now proposes a secondary school and £10m for bus/travel planning, together with a new cycle route to Dunchurch.
- 12.11 Given the site's location remote from existing urban areas, the advice of officers is that a secondary school would need to be provided on sustainability grounds to address Inspector Hayden's concerns. The scale of the site would not support a secondary school on its own and so it is expected that a school would attract pupils from a wider catchment including parts of West Northamptonshire. It is also worth noting that a school could, on the site promoter's evidence, not open until late in the development (i.e. after 2042) as it would need to wait for there to be a critical mass of children living on the site.
- 12.12 Although the site promoter's drawings show a new settlement bisected by the A45, officers' advice is that would be undesirable. It would create significant severance for residents of the new development and/or would undermine the economic role of the A45, which forms part of the Major Route Network, as a route for through-traffic by requiring 20mph speed limits, traffic calming and frequent junctions. Slightly further along the A45, the Daventry Bypass was completed in 2018 to remove A45 traffic from going through Daventry. Officers' advice is that a new settlement at Lodge Farm should similarly be bypassed by the A45.
- 12.13 Given these transport considerations, Lodge Farm was modelled in the Strategic Transport Assessment (STA). The STA recommends that delivery of Lodge Farm would require significant upgrades to the A45/M45 Thurlaston interchange; a 20mph speed limit, traffic calming through Dunchurch and a ban on right turns at Dunchurch crossroads; and further widening of the A5/A428 Halfway House roundabout.
- 12.14 Even with these changes, queueing is projected to increase at Dunchurch Crossroads and there would also be a potential eroding of the benefits of the Homestead Link road.
- 12.15 Warwickshire County Council highway officers have since indicated that they would not be supportive of the proposed traffic calming and downgrading of the B4429 through Dunchurch due to the important role of this road and the potential for this and a right turn ban to divert traffic pressure and queueing to other roads which are subject to capacity constraints, including the western approach to the Homestead Link Road and rural roads.
- 12.16 Given the above, there are no clear proposals for how the traffic impacts of Lodge Farm on Dunchurch and southern Rugby can be mitigated.
- 12.17 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.

- 12.18 The viability of this strategic infrastructure package is modelled in the Viability Assessment (included as part of the evidence base). 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. Given the scale of site-specific infrastructure Lodge Farm was assumed in the appraisal not to pay Community Infrastructure Levy.
- 12.19 Similar analysis in the Strategic Transport Assessment and Viability Assessment has been undertaken for the proposal at North West Rugby/Cosford. This site would require a far larger release for residential development of non-grey belt Green Belt (approximately 180 hectares) than would the Proposed Submission Local Plan (approximately 36 hectares). Most of the North West Rugby site is not identified as provisionally grey belt.
- 12.20 The on-site infrastructure required at North West Rugby 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 the A426/Central Park Drive roundabout, further widening of the A4071/B4112 roundabout, the creation of a new canal bridge on Brownsover Road, the creation of new roundabouts on Brownsover Road and B4112 Main Street, and the creation of a link road between Overview Way and Cosford Lane. The combined estimated cost of these highways schemes is circa £35m.
- 12.21 The Viability Assessment shows that the combined infrastructure bill for North West Rugby is not viable and could not be supported with 30% affordable housing which is a policy compliant level. To make the scheme viable affordable housing would need to be reduced to 20%. Given government policy seeks enhanced affordable housing percentages above ordinary greenfield levels on land released from the Green Belt and given the reduced rates of affordable housing being delivered at Houlton and South West Rugby, it is not considered to be reasonable to release Green Belt for a proposal that would deliver a lower than policy compliant proportion of affordable housing. Additionally, North West Rugby would not be able to pay Community Infrastructure Levy (CIL) due to the scale of on-site infrastructure needed. By contrast, the Viability Assessment indicates that the residential sites removed from the Green Belt in the Proposed Submission Local Plan can deliver 40% affordable housing and pay CIL.
- 12.22 Finally, 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 for that roundabout and no upgrade is funded. This introduces considerable risk in relation to a proposal at North West Rugby.
- 12.23 As with housing, there were other options for new employment land allocations. A number of these are discussed in the Sustainability Appraisal report and Green

Belt Exceptional Circumstances Topic Paper. Given the Green Belt release proposed for employment land on the edge of Coventry around Ansty Park, it is particularly necessary to consider non-Green Belt options that were put forward, including a southern expansion to Magna Park on the A5, land around Thurlaston on the A45, and north of Houlton on the A5.

12.24 The Green Belt Exceptional Circumstances Topic Paper discusses these alternative options in detail. In summary, the allocations on the edge of Coventry are favoured because:

- i) The need for employment land is in part sub-regional in its derivation. It reflects a proposed apportionment to “Opportunity Area 7: M6/A45/A46/M45 Coventry and Rugby” of a wider West Midlands need within the West Midlands Strategic Employment Sites Study 2024. Coventry is, by far, the largest centre of population in the opportunity area and so locating employment land on its urban edge, rather than beyond the Green Belt to the north and south of Rugby, would reduce commute distances.
- ii) Given the existing concentration of manufacturers, research and development facilities and university connections at Ansty Park, new allocations in this location would be more likely to attract manufacturing and research and development occupiers, diversifying the borough’s economy, than would more distribution-focussed locations distant from these existing clusters.
- iii) Locations at Thurlaston are not favoured on traffic grounds, due to the scale of development already happening in this vicinity through South West Rugby. Development at Thurlaston would also erode separation between the village and Dunchurch and south west Rugby within the proposed new area of separation.
- iv) Expansion to Magna Park is not favoured because it is more distant than other options from both Coventry and Rugby, driving longer-distance car commuting, and because a very large expansion to the park is already proposed in Harborough District’s Local Plan. Further expansion raises significant concerns about traffic impact on already congested parts of the A5. It also raises concerns about larger volumes of traffic using rural roads, such as the Fosse Way.
- v) Finally, land north of Houlton is highlighted in the Strategic Transport Assessment as resulting in residual queue impacts at junctions on the A5 south of the site, on the A426 Leicester Road and at M6 Junction 1. As with North West Rugby, the site is dependent upon an upgrade to the A426/A5 Gibbet Hill junction. As noted above, no scheme for that junction is identified or funded, creating delivery risk. Significant heritage constraints on this site are also identified given it forms the setting for Grade II Dunsmore House.

13 Gypsy and Traveller sites

- 13.1 As at the preferred options stage, new allocations for Gypsy and Traveller pitches are proposed. National policy requires the identification of a supply of pitches sufficient to meet assessed need.
- 13.2 The Local Plan 2011-2031 did not allocate land for pitches. The consequences of this have been that the council is often unable to resist unauthorised development and Traveller pitches have been approved on appeal. The council has already lost two Gypsy and Traveller appeals in 2025. Defending each appeal is also a significant cost to taxpayers.
- 13.3 Non-allocation of pitches would represent a significant risk to the likelihood of the plan being found sound at examination. In the 2011-2031 Local Plan examination the inspector was persuaded that a subsequently produced Gypsy and Traveller Site Allocations DPD would allocate land for pitches. However, in 2023 that DPD was abandoned because no site options for accommodating the pitch need had been identified following a call for sites.
- 13.4 To remedy this position the Proposed Submission Local Plan would be the first plan for the borough to allocate land for pitches. Allocations are proposed in three categories of site:
- i) The allocation of longstanding private sites which currently have temporary planning permission. Allocation would allow permanent permission to be granted. This applies to the sites at Rosefields, Wolvey and Top Park, Barnacle both of which have been occupied for more than ten years.
 - ii) The allocation of land for new private pitches as part of the large employment site allocation at Walsgrave Hill.
 - iii) New/expanded private sites at Bryant Bungalow, Brandon Lane, and Wilsher Ranch, Shilton Lane.
- 13.5 The allocation of these pitches, together with pitches that have already been approved at appeal and an allowance for pitch turnover would deliver 68 pitches against a 2024-2042 need for 94 pitches. This would be adequate to demonstrate supply until the mid-2030s and the council's position at examination would be that pitches for the later 2030s/early 2040s would be better identified in the next local plan produced by the successor authority.
- 13.6 It is recognised that the pitches proposed to be allocated at Top Park, Barnacle and Wilsher Ranch, Shilton would be in a location that already has a significant Gypsy/Traveller population. However, officers' advice is that in the context of past plan-making failures and a lack of alternative options to meeting pitch need, it is better to allocate land for further pitches where opportunities arise. This will allow for managed future development and increase the council's ability to resist unauthorised development.

14 Infrastructure provision

- 14.1 A local plan is a land use plan, not a transport or other infrastructure plan. However, it needs to identify the infrastructure needed to support the new development that is planned in it.
- 14.2 Local plans do not come with an implementation budget, and the delivery of necessary supporting infrastructure is dependent upon the decisions of and funding available to infrastructure providers which are not usually RBC e.g the NHS or Local Education Authority. This includes funding that can be collected through developers' contributions (s106 and the Community Infrastructure Levy).
- 14.3 With that in mind, evidence has been collected on the infrastructure implications of the Local Plan including:
- i) The Strategic Transport Assessment prepared jointly with Warwickshire County Council;
 - ii) The level two Water Cycle Study prepared in consultation with Severn Trent Water and the Environment Agency in relation to fresh water and sewerage infrastructure;
 - iii) Education discussions with Warwickshire County Council and education modelling commissioned by RBC as detailed in the Education Topic Paper;
 - iv) Discussions with the Coventry and Warwickshire Integrated Care Board in relation to primary health care infrastructure; and
 - v) The preparation of an Open Space Assessment and Playing Pitch Strategy (both forming part of the evidence base) in relation to public open space provision.
- 14.4 This work had enabled preparation of an Infrastructure Delivery Schedule which sets out the infrastructure identified as needed to deliver the development in the local plan. The Infrastructure Delivery Schedule forms part of the evidence base.
- 14.5 The scale of new infrastructure required is more modest compared to the Local Plan 2011-2031, because the additional development is less large-scale. In particular, the education modelling undertaken by WCC and a separate independent study commissioned by RBC shows that there is not projected to be a need for a new secondary school. After the planned expansion of The Avon Valley School & Performing Arts College, it is anticipated that 2 secondary school forms of entry would be required in the period to 2042. This is less than the level that would justify creation of a new secondary school and the Local Education Authority have indicated that the need could be met by expanding existing schools.
- 14.6 Accordingly, it is not proposed to safeguard land for the creation of a new secondary school as was proposed at preferred options stage.
- 14.7 In discussions with the Coventry and Warwickshire Integrated Care Board (ICB) the ICB has stated that the scale of additional new housing sites proposed through

Proposed Submission Plans would not warrant the creation of a new GP surgery. Instead their approach would be, on an application by application basis, to assess the need for contributions to enhancement at the practice serving the development. The requirement for new surgeries at Houlton and South West Rugby remains in the Infrastructure Delivery Schedule.

14.8 Residents continue to seek provision of a new GP surgery at Long Lawford, but the NHS Coventry and Warwickshire Integrated Care Board (which is responsible for planning primary care) has indicated that there would not be the business case to support a new surgery at the village which is served by existing surgeries in Rugby.

14.9 University Hospitals Coventry and Warwickshire responded to preferred options consultation setting out its support for the creation of a new blue light route through the Walsgrave Hill site.

15 Development management policies

15.1 Although they do not represent changes to the policies proposed in the preferred options consultation document, it is important for members to be aware of some of the development management policies in the Proposed Submission Local Plan. These policies would help address planning issues highlighted back in late 2023 in the first Issues and options consultation document and also deliver on the Council's Corporate Strategy and Economic Strategy. The policies seek to deliver a Thriving Rugby to bring about borough wide investment and regenerate the Town Centre and a Greener Rugby to protect the environment and ensure the borough adapts to climate change. Specific policies to highlight are:

- i) Policy CL1 would require net zero buildings (at present there is no local building energy performance requirement beyond Building Regulations).
- ii) Policy C1 includes the Council's first policy on the regeneration of Rugby town centre (there is no policy on the centre in the current Local Plan) including the delivery of the public realm scheme on North Street/Church Street/Market Place.
- iii) Policies C3 and C4 designate local and district centres and neighbourhood hubs for the first time.
- iv) Policy EN6 sets a new requirement for 20% post-development tree canopy cover from major new development outside Rugby town centre.
- v) Policy H7 on housing standards for the first time imposes the Nationally Described Space Standard for minimum housing sizes together with minimum garden sizes (at present these are advisory only) and introduces for the first time a requirement for all dwellings to meet the optional Building Regulation requirements for accessible and adaptable dwellings (the successor to Lifetime Homes) and again for the first time sets a requirement for delivery of a proportion of wheelchair user dwellings.

- vi) Policy H8 sets policy to restrict over-concentrations of Houses in Multiple Occupation, a necessary addition to the article IV direction which came into effect in early 2025 which together will give the council control over the location of HMOs.
- vii) Policy I5 safeguards the land necessary to deliver the Nuneaton Parkway and Rugby Parkway new railway stations.

15.2 Finally, it is worth noting the proposed allocations restricted to older persons housing at Warwick Road, Wolston and West Farm and Home Farm, Brinklow. These would be the first such allocations in a borough local plan. Similarly, the requirement for self/custom build housing at Dyers Lane, Wolston and as part of the mix at land south of Rugby Road, Brinklow add to the existing requirement for self-build at South West Rugby to increase the provision of such housing.

15.3 National policy in paragraph 49 NPPF advises that local planning authorities may give weight to relevant policies in emerging plans according to: the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given); the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

15.4 Paragraph 50 NPPF states that prematurity would be unlikely to justify refusal of planning application unless the development would in its own right or cumulatively undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and the plan is at an advanced stage. Paragraph 51 suggests an advanced stage means submitted for examination.

16 Public consultation and steps thereafter

16.1 The public consultation is required by the Regulations to run for six weeks. The consultation will run from 26 January 2026 until 9 March 2026. Government has published a model representation form for local plans at the publication stage. This form invites comments on whether the plan is legally compliant, sound and compliant with the duty to cooperate.

16.2 A Communications Plan is attached as Appendix 10. The consultation documents will be published on the council's website with hard copies made available at the town hall and in libraries. The council's social media will be used to draw attention to the consultation and a short video explaining the consultation will be produced (as before) on a new webpage. In person drop-in consultation events will be held in affected communities, with a list of events to be agreed with the portfolio holder for Growth & Investment and Digital & Communications.

16.3 In contrast to the previous regulation 18 consultations which were undertaken during plan preparation and evidence gathering at a point at which the strategy was being shaped and could change, this consultation is on the final version of the plan.

- 16.4 It is important to note that after the Regulation 19 consultation the council cannot make changes to the local plan. It must submit the version consulted on. Planning Inspectorate guidance states that if the council wishes to make changes to the version consulted upon it should prepare an addendum including (if the changes are significant) sustainability appraisal and habitat regulations assessment of the changes and then re-consult with the public for six weeks on that addendum. The guidance notes that sometimes local planning authorities submit lists of proposed changes to the published plan that have not been consulted on. In such circumstances the changes would not be treated as part of the plan to be examined but may be considered by the inspector(s). Recommendation (5) to this report would give delegated authority to the Chief Officer for Growth and Investment to produce such a list of proposed changes if needed.
- 16.5 Following the close of the public consultation in March, the Council is required to update the consultation statement to include details of the number of representations received and a summary of the main issues raised in those representations. Copies of the representations are then required to be submitted to the Secretary of State along with the other submission documents. Recommendation (4) in this report would give delegated authority to the Chief Officer for Growth and Investment to submit the plan and supporting documents for examination.
- 16.6 As the plan's end date is set as 2042, it will be important for the plan to be submitted for examination as soon as possible following the closure of the public consultation to expedite the examination and adoption of the plan and thereby maximise the chance that it will be able to have 15 years to run post adoption.
- 16.7 Post-submission to the Secretary of State, the timetable for the examination would be determined by the Planning Inspector(s). Hearing sessions will be scheduled, most likely for autumn 2026.
- 16.8 The Inspector(s) can, following the examination, conclude that the plan meets the legal requirements and is 'sound' or that issues of non-compliance or soundness can be addressed through main modifications to the plan. Alternatively, the plan could be found to be non-compliant and/or unsound with such issues unable to be remedied by modifications. If main modifications are recommended, the Council would need to consult upon them for six weeks during the examination process.
- 16.9 Recommendation (6) of this report would give delegated authority to the Chief Officer for Growth and Investment to participate in the local plan examination.
- 16.10 Only following a finding of legal compliance and soundness at the conclusion of the examination could the plan return to Council for adoption.

17 Update to Statement of Community Involvement

- 17.1 Appendix 8 details proposed updates to The Statement of Community Involvement ('SCI'). The current version is dated December 2024. The adopted

version proposed to be adopted is Appendix 7. The SCI is a document that sets out how the council will engage the public in planning processes.

- 17.2 The updates are minor updating amendments to ensure the document does not contain out of date material about the preparation of the local plan and South West Rugby Design Code SPD and that it does not contain references to the Council communicating via the social media platform X of which it is no longer a member.
- 17.3 The final proposed amendment is to clarify when responses to development strategy consultations will be made available for public inspection. This amendment is necessary to ensure consistency with the Development Strategy Privacy Notice. This amendment is explained in more detail in the following paragraphs.
- 17.4 Section 2 “Community involvement in plan making” of the 2024 SCI at paragraph 2.38 under the heading “What happens to comments you submit?” states:
- “All representations received must be available for public inspection, so we cannot treat them as confidential. Representations will be managed in line with our privacy notice.”.
- 17.5 The relevant privacy notice can be found here: <https://rugby.gov.uk/w/privacy#development-strategy> and states:
- “We may make representations you submit to us available for public inspection and/or publish them on our website.** When we publish your representations we will also publish your name. This is necessary because we cannot accept anonymous representations in line with Planning Inspectorate requirements and requirements of our Statement of Community Involvement (SCI). We will not, however, publish your other personal information such as your postal address or email address which will be redacted. However, in line with our SCI you will need to supply your name and address as we are unable to accept anonymous representations.”
- 17.6 The wording of paragraph 2.38 of the SCI needs to be amended to make clear that the requirement to make representations received available for public inspection applies only to some consultations that may be held by the Council’s Development Strategy service.
- 17.7 For example, Regulation 22 of the Town and County Planning (Local Planning) (England) Regulations 2012 requires representations made on the local plan at the Regulation 19/20 consultation stage to be submitted to the Planning Inspectorate and made available on the council’s website, in libraries and at the council’s offices in accordance with Regulation 35.
- 17.8 By contrast, representations submitted at prior Regulation 18 stages of local plan-making, and representations submitted to supplementary planning document consultations under Regulation 13, are not required to be made available for public inspection by the Regulations. Instead, Regulation 18 consultation responses are required to be summarised in a consultation

statement prepared under Regulation 22(1)(c) which is required to be submitted to the Secretary of State when a local plan is submitted for examination. Similarly, under Regulation 12, representations which are made in response to a supplementary planning document are required to be summarised in a consultation statement.

- 17.9 The position on making representations available is also different for neighbourhood plans, to which the SCI also applies, and is governed by the Neighbourhood Planning (General) Regulations 2012.
- 17.10 Comments submitted to the qualifying body in response to its consultation(s) on a neighbourhood plan under Regulation 14 prior to submission of the plan to the local planning authority are not required to be made available for public inspection but instead the qualifying body must submit a consultation statement (under Reg 15) to the local planning authority.
- 17.11 The local planning authority is required by Regulation 17 to send to the person carrying out the examination of a neighbourhood plan copies of representations made under Regulation 16 (in response to the consultation undertaken by the local authority). However, there is no requirement in the Regulations for the local planning authority to publish or make available for inspection those representations. Equivalent provisions apply to neighbourhood development orders and to representations received in relation of other consultations that may be held under the Neighbourhood Planning Regulations, for example of designation of a neighbourhood forum or neighbourhood area.
- 17.12 Finally, although not specifically mentioned in the SCI, there is also a requirement in the Community Infrastructure Levy Regulations 2010 to submit to the examiner and publish/make publicly available representations submitted in response to a Regulation 17 consultation on a draft CIL charging schedule.
- 17.13 To reflect these differing requirements to make representations available for inspection, it is proposed that paragraph 2.38 is amended as follows:

“All Representations received in response to consultations undertaken by the Council’s Development Strategy service as part of the preparation of local plans, supplementary planning documents, other local development documents, neighbourhood plans or development orders, and other public consultations related to planning policy must may be made available for public inspection, so we cannot treat them as confidential. Such representations will be made available for inspection and/or sent to an independent examiner where this is a legal requirement of applicable legislation. In this context, made available means published on the council’s website and made available for inspection in hard copy at the council’s offices and in such other locations as may be required by applicable regulations (usually libraries). Where there is not a legal requirement to make representations received available for public inspection, the Council may as an alternative to or in addition to making those representations available, summarise the issues they raise in a consultation report. Representations will be managed in line with our privacy notice.”.

17.14 This amendment is also necessary to ensure consistency with the privacy notice.

18 Conclusion

18.1 The report has explained the reasons for changes made between preferred options consultation document and the Proposed Submission Local Plan. It outlines some of the new evidence that has been produced and the proposed timetable for the Regulation 19 consultation and the process thereafter.

18.2 This supports the recommendations as set out at the start of the report above.

Name of Meeting: Cabinet

Date of Meeting: 6 January 2026

Subject Matter: Rugby Borough Local Plan 2025-2042 Regulation 19
Consultation and submission

Originating Department: Growth and Investment

DO ANY BACKGROUND PAPERS APPLY

☒ **YES**

☐ **NO**

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
	Local Development Scheme https://rugby.gov.uk/w/local-development-scheme

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

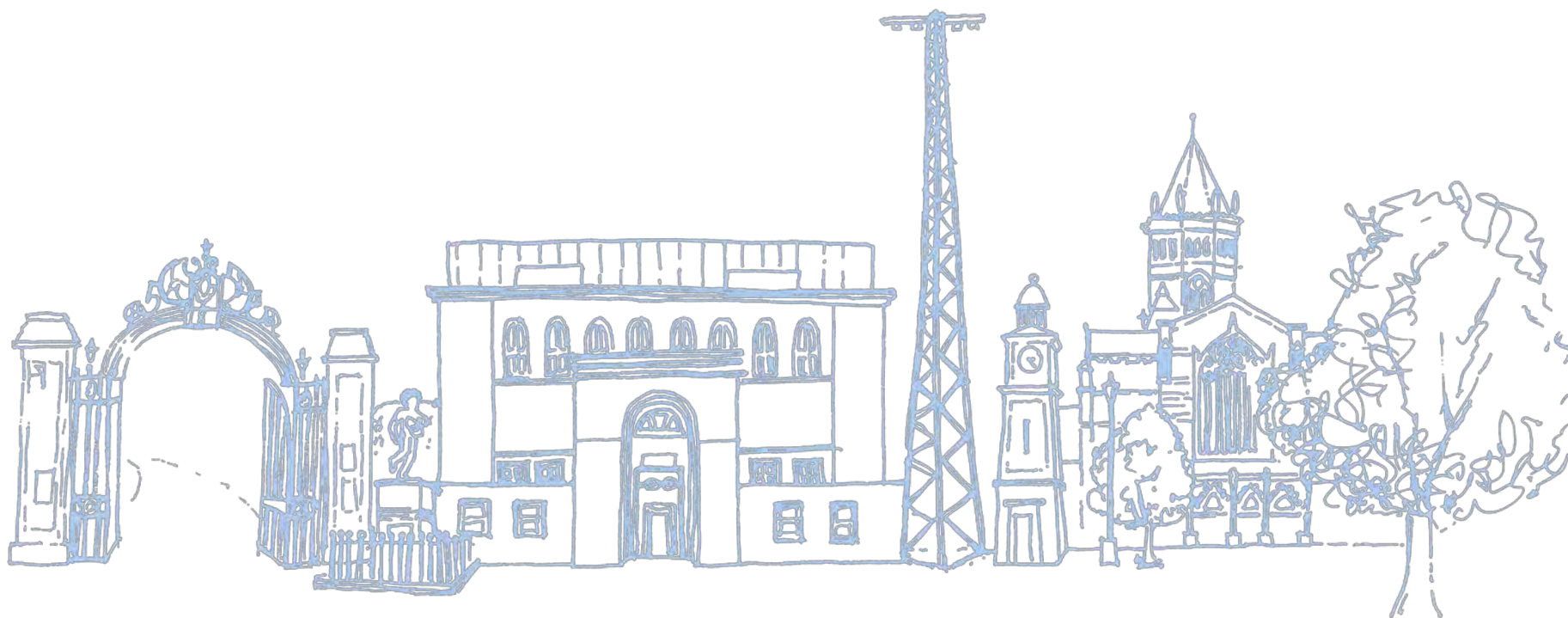
☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Rugby Borough Local Plan 2025-2042

Proposed submission draft

January 2026



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Superseded policies: upon adoption this plan will supersede all policies of the Rugby Borough Local Plan 2011-2031

Objectives

- 1 Support the diversification and growth of Rugby Borough's economy in sustainable locations
- 2 Support the revival of Rugby town centre
- 3 Reduce carbon emissions and adapt to climate change
- 4 Raise design standards
- 5 Deliver infrastructure-led growth
- 6 Facilitate a greener, more biodiverse borough

Strategic priorities & policies

S19(1B) of the Planning and Compulsory Purchase Act 2024 requires local plans to identify strategic priorities for the development and use of land in the authority's area. National policy defines as "strategic policies" those policies which address strategic priorities. National policy states that strategic policies set the overall pattern, scale and design of places making sufficient provision for (amongst other things) homes, employment, retail, leisure and other commercial development together with infrastructure, community facilities, conservation and climate change mitigation.

The following are the strategic priorities and the strategic policies that address them:

Strategic priority	Strategic policies
Provision of homes	S4, S6, S8, S9, H2, Development site allocation annex
Provision of employment land	S2, S7, Development site allocation annex
Overall pattern and scale of development and conservation	S1, S5, EN3, EN4
Climate change	CL1, CL2
Town centre development	C1 to C4
Design standards	H7, H8
Infrastructure and community facilities delivery	W2, I1 to I5

Policies not listed above are non-strategic.

Because the spatial strategy is to deliver housing sites in urban and rural locations of a range of sizes, all housing allocations made through this plan are strategic policies necessary to address the strategic priority of the provision of homes. No distinction is made between strategic and non-strategic allocations based on site size.

Strategy



Strategy summary & key diagram

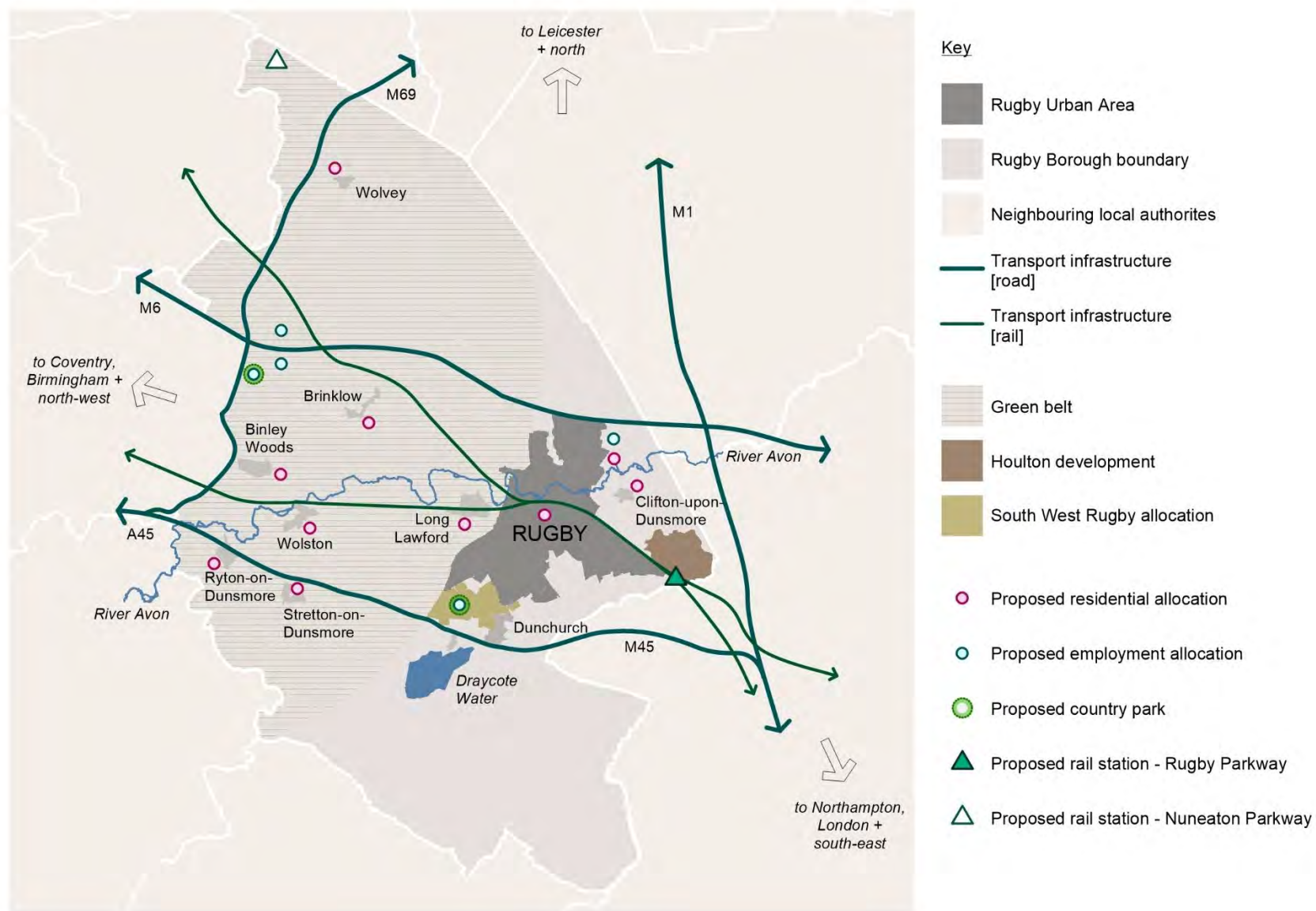
- 1.1 This spatial strategy for development of homes and employment land in the borough in the period 2025-2042 is illustrated by the key diagram (below).
- 1.2 The housing requirement is set at local housing need calculated using the government's standard method. Of the requirement for 10,812 new homes (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.
- 1.3 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.
- 1.4 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.
- 1.5 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.
- 1.6 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.
- 1.7 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.
- 1.8 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.
- 1.9 The strategy for employment land will deliver 1,034,000m² of new industrial and warehousing

floorspace 2025–2042 (approx. 287 hectares). Of this, 540,000m² (815,000m² if Crowner Fields Farm, which has planning permission is included) comprises new land allocations through this plan.

- 1.10 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.
- 1.11 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.
- 1.12 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 365,000m² 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.

- 1.13 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.
- 1.14 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.



S1 Settlement hierarchy

A. New development will accord with the following hierarchy:

- i. Rugby town (as shown on the policies map) will be the main focus for new homes and employment.
- ii. Main rural settlements of Binley Woods, Brinklow, Clifton upon Dunsmore, Dunchurch, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston and Wolvey will accommodate development allocated through this plan and through neighbourhood plans. Except within settlement boundaries, it is not envisaged that further non-plan-led development will be needed, but if further development is required this should be in proportion to the settlement and would likely be small scale.
- iii. Only limited development will be permitted at the other rural settlements of Ansty, Barnacle, Birdingbury, Bourton on Dunsmore, Brandon, Bretford, Broadwell, Burton Hastings, Church Lawford, Churchover, Coton House, Draycote, Easenhall, Flecknoe, Frankton, Grandborough, Harborough Magna, Lawford Heath, Leamington Hastings, Marton, Monks Kirby, Newton, Pailton,

Princethorpe, Shilton, Thurlaston, Wibtoft, Willey, Willoughby, and Withybrook.

- 1.15 The settlement hierarchy seeks to direct development to those locations with services and facilities.
- 1.16 This policy shall be read alongside Policy S5 (Countryside protection) which restricts development outside of settlement boundaries.
- 1.17 The plan's strategy includes significant planned expansion at some main rural settlements as part of a coordinated overall strategy. If further, unplanned, development is required at main rural settlements this should be in proportion to the settlement in which it is located and would likely be small scale.
- 1.18 It should be noted that the strategic employment allocations planned alongside Ansty Park and at Crowner Fields Farm/Home Farm, Ansty are at the edge of the Coventry urban area. These allocations effectively sit outside of the borough's settlement hierarchy.

S2 Strategy for homes

- A. To meet our future need for housing, 10,812 new homes will be delivered in the period 2025-2042 (636 each year).
- B. New homes will be delivered in the locations set out in the table below:

Source	Number of homes 2025-2042
South West Rugby S8 & S9	3,505
Houlton remainder deliverable by 2042	3,060
Eden Park, Rugby	602
Other allocations under Local Plan 2011-2031	205
Other sites with planning permission	621
Allocations under Policy S6	2,886
Small site windfalls (fewer than 5 homes)	850
Total	11,729

- 1.20 The housing target based on the government's standard method is 636 additional new homes each year.
- 1.21 Much of the housing growth to meet this need is already committed through the Houlton, South West Rugby and Eden Park sites which will continue to be built out during the plan period.
- 1.22 Supply is allocated for 8.5% more than the minimum requirement as a buffer to increase the likelihood of the council being able to continually demonstrate a five-year housing land supply.
- 1.23 Additional sources of supply will be windfalls on sites of fewer than 5 dwellings (50 homes per year), non-allocated sites within settlement boundaries, and new allocations made through neighbourhood plans. Appendix 1 is a housing trajectory for the plan period.
- 1.24 2025-2042 housing requirements for designated neighbourhood areas in which site allocations are made in this plan are the sum of homes allocated in the neighbourhood area. For designated neighbourhood areas in which no allocations are made, the requirement will be calculated as follows: no. of homes in the designated neighbourhood area ÷ no. of homes in the borough * 636 * the number of years remaining in the plan period when the neighbourhood plan is produced.

S3 Strategy for employment land

A. To meet Rugby Borough's need for employment land in the period 2025-2042 the following levels of new employment development will be delivered:

- i. 19,761.3m² of use class E(g)(i) and (ii) office floorspace (approx. 3.95 hectares)
- ii. 1,034,000m² (approx. 287 hectares) of floorspace for use classes B2, E(g) (iii), and B8

B. New floorspace in use classes B2, B8 and E(g) (iii) will be delivered in the locations set out in the table below:

Source	Approximate square metres of floorspace 2025-2042
Prospero Ansty and Ansty Park	26,663
Coton Park east of Castle Mound Wy	26,421
Padge Hall Farm	137,730
Houlton remaining employment land	15,000
Employment planning permissions on small sites as at 1 April 2025	13,429.4
New allocations under Policy S7:	

Crowner Fields Farm, Ansty	275,000
Coton Park east	115,000
South West Rugby phase 2	60,000
Ansty Park north	75,000
Land at Walsgrave Hill	290,000
Total	1,034,243

- 1.25 Delivery in recent years has skewed towards large units with fewer smaller units for SMEs. To address this, some site allocations under Policy S7 require smaller units.
- 1.26 To support economic diversification of the borough's economy and the expansion of its regionally significant manufacturing and R&D cluster, the Ansty Park north allocation under Policy S7 is ring-fenced for these uses.
- 1.27 As existing supply of office floorspace exceeds the identified requirement, the only new allocation for office use is at Crowner Fields Farm, Ansty which has planning permission.
- 1.28 E(g)(ii) floorspace is included within the office requirement, but given flexible mixes of employment use classes both within planning permissions, buildings and sites (augmented by permitted development) precise use class requirements are not possible and this use is likely to be delivered on mixed industrial land.

S4 Sites for Gypsies and Travellers

- A. To assist in meeting the need for pitches, new Gypsy and Traveller sites are allocated as shown on the policies map as follows:
- i. As part of the Walsgrave Hill employment allocation under Policy S7 for 8 pitches
 - ii. At land adjacent Rosefields, Hickley Road, Wolvey for 1 pitch
 - iii. At Top Park, Top Road, Barnacle for 22 pitches
 - iv. At Wilsher Ranch/Nethergreen, Shilton Lane, Shilton for 4 pitches
 - v. At Bryants Bungalow, Brandon Lane for 10 pitches
- B. Planning applications for Gypsy or Traveller pitches must accord with national policy and other policies of this plan. Additionally:
- i. there must be adequate provision of on-site services for water supply, power, drainage, sewage and waste disposal; and
 - ii. the site must be of sufficient size to allow adequate outdoor amenity space and privacy for residents and accommodate necessary on-site facilities.

- C. Both existing and new permanent Gypsy and Traveller sites will be safeguarded for Gypsy and Traveller use.

- 1.29 The Gypsy and Traveller Accommodation Assessment 2025 (GTAA) identifies a need for 94 pitches (1 April 2024 to 31 March 2042). Since completion of the assessment, planning permission has been granted for 14 further pitches. In addition, the GTAA identifies the potential for household dissolution to provide a supply of 9 pitches in the period to 2041/42. New allocations for 45 pitches are made. Therefore a total supply of 68 pitches is identified, adequate to provide supply to beyond 2035.
- 1.30 The policy identifies criteria against which windfall applications will be assessed. Other important policies of this plan in assessing applications will be (amongst others): I1 Transport, D1 Well-designed places, D3 Landscaping, EN2 Landscape protection, and EN8 Environmental protection and amenity.

S5 Countryside protection

- A. Outside of the settlement boundaries shown on the policies map, new development will only be permitted where it is in accordance with a policy of this plan which supports development in such locations.
- B. The extent of the Green Belt in the borough is delineated on the policies map. National Green Belt policy will be applied in these areas.
- C. Within settlement boundaries, development will generally be permitted subject to compliance with other policies of this plan.

and the extraction of minerals in rural locations will be supported in line with national policy.

- 1.33 Paragraph B of this policy gives effect to national Green Belt policy.

- 1.31 Under paragraph A, policies of this plan which, in principle, support specific types of development in rural locations are:

- CL2 Renewable energy and low carbon technology
- E2 Employment development
- E3 Rural economy
- C2 Main town centre uses
- H3 Rural worker dwellings
- H4 Rural exception sites
- H5 Replacement dwellings

- 1.32 Additionally, development of essential infrastructure for transport, telecommunications, power supply, security, waste management, water supply, wastewater, flood risk,

S6 Residential allocations

- A. The sites shown on the policies map and set out in the development site allocations annex to this plan are allocated for development, as detailed below.
- B. The development of the sites shall accord with the development principles set out in the development site allocations annex and with other policies of this plan.

Ref.	Site name	Units
62	Morgan Sindall House, Rugby	90
332	Albert Street, Rugby	25
353	Town Hall, Rugby	114
283	Rugby Central Shopping Centre	200
350	Rounds Gardens, Rugby	70
351	North of Rounds Gardens, Rugby	60
354	92 Lower Hillmorton Rd, Rugby	34
355	Land adjacent to 44 Craven Road, Rugby	5
279	Stagecoach Car Park, Rugby	32
153	Westway Car Park, Rugby	24
294	Land adjacent 9 Railway Terrace, Rugby	14
356	The Railings (NHS) Rugby	10
357	28-29 High St, Rugby	8
352	Former snooker hall, Railway Terrace	7
349	Land to rear of Albert St, Rugby	5
338	Land south of Crick Road, Houlton	250
59	Newton Manor Lane, Brownsover	285

54	Former Oakdale Nursery, Binley Woods	43
337	West Farm and Home Farm, Brinklow	75
315	Land south of Rugby Road, Brinklow	250
129	Land N of Lilbourne Rd, Clifton upon D'more	60
202	Newton Road, Clifton upon Dunsmore	80
307	North Road, Clifton upon Dunsmore	10
253	Lawford Fields Farm, Long Lawford	250
316	Land at Long Lawford	400
172	Elizabeth Way, Long Lawford	5
87	Hillcrest Farm, Newton	25
100	Land at High St., Ryton-on-Dunsmore	37
6	Fosse Way, Stretton-on-Dunsmore	3
81	Land W of Fosse Way, Stretton-on-D'more	40
348	The Croft, Stretton-on-Dunsmore	70
39	Dyers Lane, Wolston	15
136	North of Warwick Rd, Wolston	80
358	Land at Coventry Road, Wolvey	60
309	Land north of B4109, Wolvey	150

- 1.34 The development site allocations annex provides more detailed development principles. New homes are focused on Rugby, which, including existing commitments, will accommodate at least 75% of new housing 2025-2042. Within the rural areas new homes are planned at the main rural settlements, with the largest number of new homes planned at Long Lawford.

S7 Employment allocations

- A. The sites shown on the policies map and set out in the development site allocations annex to this plan are allocated for development as detailed below.
- B. The development of the sites shall accord with the development principles set out in the development site allocations annex and with other policies of this plan.

Site ref.	Site name	Floorspace
64	Coton Park East	Circa 115,000m ²
17	South West Rugby employment phase 2	Circa 60,000m ²
14	North of Ansty Park	Circa 75,000m ²
95	Crowner Fields Farm and Home Farm, Ansty	Circa 275,000m ²
121	Land at Walsgrave Hill	Circa 290,000m ²
Total		865,000m ²

- 1.35 New employment allocations are proposed as shown in the table above. The floorspace figures identified in the table above are for non-office employment uses (see glossary). Office use is a main town centre use and, unless ancillary or specifically allocated through this plan, would need to accord with Policy C2.

- 1.36 Alongside sites that already have planning permission, the sites allocated through this policy will deliver the additional floorspace needed over the plan period.
- 1.37 The development site allocations annex provides more detailed development principles for the sites.

S8 South West Rugby

- A. South West Rugby as delineated on the policies map will be a new neighbourhood of around 4,000 dwellings together with employment land as allocated by Policy S7.
- B. The district centre will comprise:
 - i. a convenience store, other Class E uses with residential or office uses on upper floors; and
 - ii. a 7 GP surgery.
- C. Development of the site shall deliver:
 - i. a 6FE secondary school and two 2FE primary schools, one of which will be co-located with the secondary;
 - ii. the spine road network detailed in Policy S9;
 - iii. a comprehensive walking and cycling network;
 - iv. high quality public transport services to Rugby town centre;
 - v. public open space and sport provision including a continuous green and blue infrastructure corridor incorporating Cawston Spinney and Cock Robin Wood;

- vi. the protection of the woodland within the site including appropriate buffers to protect the ecology, health and recreational value of the ancient woodland; and

- vii. other strategic infrastructure as detailed in the South West Rugby Masterplan SPD.

- D. Development shall be informed by the South West Rugby Masterplan SPD. Ad hoc or piecemeal development that is inconsistent with this policy or the Masterplan SPD will not be permitted.
- E. Development shall accord with the South West Rugby Design Code SPD.
- F. Physical and visual separation from the Dunchurch settlement boundary shall be maintained by a significant green buffer to prevent coalescence.
- G. The employment land shall deliver landscaping to mitigate its impact on the landscape and heritage assets.

1.38 South West Rugby was allocated under the Local Plan 2011-2031 and will continue to be developed over the plan period.

1.39 The policy sets the framework for delivering a high-quality development and necessary mitigation. This is also detailed in the South West Rugby Masterplan SPD and the South West Rugby Design Code SPD.

S9 South West Rugby spine road network

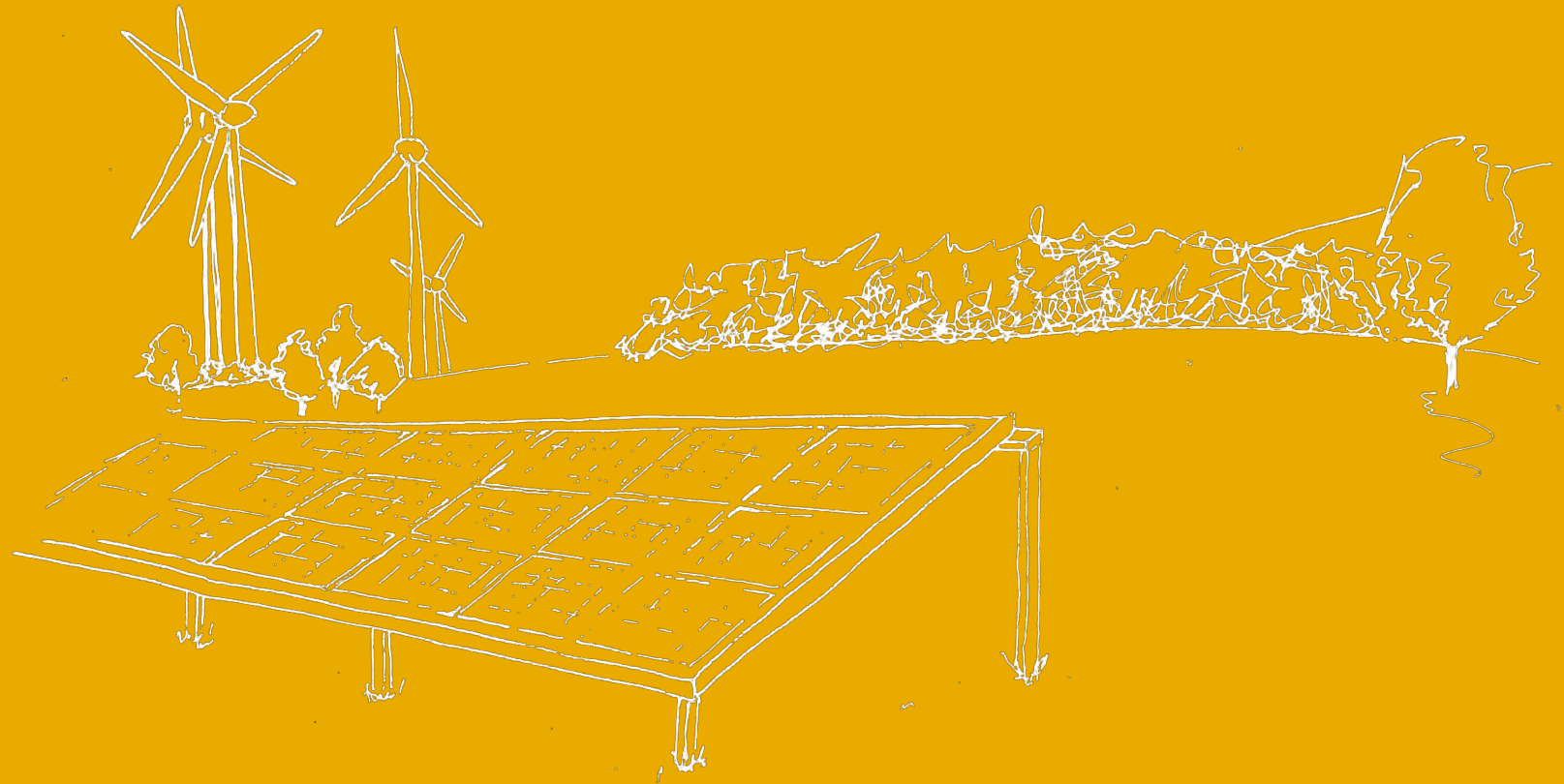
- A. South West Rugby shall deliver the full spine road network in accordance with the indicative alignment shown on the policies map, although the detailed alignment of the spine road network will be determined through planning applications.
- B. Development proposals which would prejudice the delivery of the spine road network will not be permitted.

1.40 The spine road network comprises:

- the Homestead Link between the A426 south of Cock Robin Wood and Coventry Road (B4429) west of Dunchurch;
- the Potsford Dam Link between the A45/M45 roundabout and the A4071 at Potsford Dam Farm;
- Cawston Lane and the community spine road between the B4642 and Alwyn Road; and
- The sustainable transport corridor (with a bus gate) between the Homestead Link and the Potsford Dam Link.

1.41 The spine road network is essential highways mitigation for the South West Rugby development.

Climate



CL1 Net zero buildings

A. New buildings comprising one or more dwellings and new non-residential buildings of 100m² gross internal area or more must be designed and built to be net zero carbon in operation. To achieve this, new buildings must:

- i. be ultra-low energy,
- ii. 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
- iii. 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
- iv. 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:

- i. a maximum space heating demand of 30kWh/m²/yr; and
- ii. total Energy Use Intensity (EUI) of no more than 40kWh/m²/yr.
- iii. 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/m²/yr.

C. To help achieve criterion A.i. above, new build non-residential buildings shall achieve:

- i. a maximum space heating demand of 20kWh/m²/yr; and
- ii. a maximum total EUI of 70kWh/m²/yr for schools and offices; or 35kWh/m²/yr for warehouses and light industrial uses (without refrigeration/conditioning); or a maximum regulated-energy-only EUI of 40kWh/m²/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 10,000m² (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.

CL2 Renewable energy and low carbon technology

- A. Proposals for renewable energy and low carbon energy development will be permitted where they accord with the following paragraphs of this policy and other relevant policies of this plan.
- B. Proposals which constitute inappropriate development in the Green Belt need to demonstrate very special circumstances which outweigh the harm to the Green Belt. In assessing whether very special circumstances exist, regard will be had to:
 - i. the wider environmental benefits associated with increased production of energy from renewable sources;
 - ii. the potential to mitigate visual impacts on openness;
 - iii. the permanence of the development, including proposals for decommissioning and restoration post-development; and
 - iv. community benefits of the proposal (which pursue a planning purpose and are reasonably related to the development), including local community ownership.
- C. Wind turbine development will, subject to compliance with other policies of this plan, be permitted within the

areas shown as suitable on the policies map.

Additionally, small or medium wind turbines will be permitted within Strategic Employment Sites and employment allocations.

- D. Renewable energy proposals that would result in the loss of 20 or more hectares of best and most versatile agricultural land will only be permitted if the need for the development clearly outweighs the loss.
- E. Energy storage infrastructure will be permitted where it is co-located with renewable energy development; or it alleviates grid constraints and contributes to delivery of renewable energy.
- F. Significant positive weight will be given to renewable and low carbon energy development which has clear evidence of local community involvement and leadership.

- 2.5 Renewable energy development proposals will be considered against other relevant policies of this plan including EN1 (Biodiversity and geodiversity protection), EN2 (Landscape protection), EN8 (Environmental protection and amenity), and D4 (Historic environment). Impacts on the amenity of neighbouring uses must be assessed to be acceptable in line with policy EN8. A small or medium wind turbine means a turbine that is not more than 40 metres in height.

CL3 Water supply, quality and efficiency

- A. New development shall minimise the need for new infrastructure by being located where there is a adequate water supply.
- B. New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.
- C. 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.

- 2.6 Proposals should take into account Severn Trent's Water Resource Management Plan and Strategic Business Plan as well as the findings of the Water Cycle Study and the River Basin Management Plan prepared by the Environment Agency (or updated versions of the same).
- 2.7 Good quality watercourses and groundwater are vital for the provision of drinking water. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be required to support the planning application.
- 2.8 Rugby Borough falls within an area of 'serious water stress'. Additional water demands must therefore be carefully managed, and measures implemented to minimise water demand through efficiency. The latest Water Cycle Study (2024) suggests that there is justification to require the highest possible water efficiency standards, and this has been corroborated by Seven Trent Water.
- 2.9 BREEAM WAT 01 is the Building Research Establishment Environmental Assessment Method for calculating the efficiency of a building's water consumption compared to a baseline standard. This is calculated using the BREEAM UK New Construction 2018 Wat 01 calculator tool (or as updated from time to time). A completed calculator will need to be submitted in support of an applicable planning application.

CL4 Climate adaptation

- A. All development shall be resilient to, and adapt to the future impacts of, climate change. To achieve this:
- i. development shall be designed to minimise overheating and reduce the demand for air conditioning systems. This should be achieved through (amongst other things) building layout, orientation, and choice of materials; and
 - ii. the design of green space shall be optimised to provide urban cooling and manage local flood risk; and
 - iii. vulnerability of the development to flood risk shall be minimised, in accordance with Policy EN7, and Sustainable Drainage Systems (SuDS) provided, in accordance with Policy D5

2.10 Ensuring new development is adapted to the future climate is an objective of this plan. Climate change adaptation is a cross-cutting issue and important consideration for all new development.

2.11 Other policies of this plan are also relevant, particularly Policy CL3 on water use.

Economy



E1 Employment land protection

- A. Land within Strategic Employment Sites and employment allocations (in both cases as shown on the policies map) or designated for employment use in a made neighbourhood plan will be retained in or developed for employment uses as defined in the glossary.
- B. Applications for non-employment uses of land to which paragraph A of this policy applies will only be permitted where:
 - i. the site has been unsuccessfully marketed for a continuous period of at least 24 months ending with the date of the application. Such marketing has been undertaken by a commercial agent with a local or sub-regional practice connected to Rugby Borough at a price or rent that a professional valuation demonstrates genuinely reflects its market value taking account of its condition and location; and
 - ii. a robust development appraisal demonstrates that the redevelopment or refurbishment of the site for employment use would not be viable.
- C. Planning permission granted for the use of land to which paragraph A of this policy applies for a use within

Classes E(g)(i)(ii) or(iii) will be subject to a use-limiting condition preventing change to non-employment uses.

- 3.1 Rugby Borough has a growing economy, and this policy protects existing strategic employment sites and employment allocations for employment use.
- 3.2 Employment use is defined in the glossary.
- 3.3 The Strategic Employment Sites are Ansty Park, Butlers Leap, Central Park, Dunchurch Trading Estate, Europark, Glebe Farm Industrial Estate, Lawford Heath Industrial Estate, Midland Trading Estate, Paynes Lane, Prologis Park Ryton, Rugby Cement Works, Rugby Gateway, Shilton Industrial Estate, Stepnell Park, Somers Road Industrial Estate, Swift Park, Swift Valley, and Symmetry Park Rugby.

E2 Employment development

- A. Within settlement boundaries but outside of Strategic Employment Sites and employment allocations the development of employment uses will be permitted, subject to compliance with other policies of this plan.
- B. Subject to compliance with other policies of this plan, the infilling and partial or complete redevelopment of buildings within Strategic Employment Sites or employment allocations for employment use will be permitted.
- C. Office proposals on Strategic Employment Sites or employment locations will be permitted where there are (in accordance with Policy C2) no sequentially preferable sites available or where it can be demonstrated that the office would be genuinely ancillary in size and function to an existing employment use.
- D. Proposals for offices not exceeding 100m² in gross internal floor area will not be subject to the sequential test.
- E. Outside of settlement boundaries, development for employment uses will only be permitted where:
 - i. It would not undermine the continuance of an existing viable agricultural use; and

- ii. It would comprise the conversion or redevelopment at a similar scale of a building that has been in existence for at least ten years; or
- iii. It would comprise a proportionate expansion of an existing building in employment use; or
- iv. It would comprise the infilling of a vacant area within a site in employment use.

- 3.4 Paragraph A of the policy supports the delivery of units for small and medium sized businesses in line with the Rugby Borough Economic Strategy.
- 3.5 Paragraph D supports national policy which states that the retail sequential test should not be applied to small scale rural offices. The council considers that the test should equally not be applied to small scale offices in the urban area. The policy provides certainty as to what will be regarded as small scale.
- 3.6 The support conferred by this policy is subject to compliance with other policies of the plan in particular policies on Green Belt, design, landscape, environmental protection and transport (amongst others).

E3 Rural economy

- A. The following forms of development are acceptable in principle both in and outside of rural settlement boundaries, subject to their compliance with other policies of this plan (including Green Belt policy):
- i. small-scale tourism, visitor accommodation and leisure-based uses including sport and recreation;
 - ii. small-scale expansion of existing holiday caravan/chalet sites;
 - iii. garden centres and nurseries;
 - iv. equine and equestrian development;
 - v. agricultural and forestry buildings;
 - vi. new canal-based facilities, but, where such facilities are outside of settlement boundaries, not including permanent residential moorings.
- B. Proposals within paragraph A of this policy must be of an appropriate scale and type for their location.
- C. New visitor accommodation outside settlement boundaries must be demonstrated to be viable through a credible business case.
- D. Conversion of visitor accommodation outside of settlement boundaries to permanent residential use will

not be supported.

- E. Diversification of farms will be permitted where:
- i. best and most versatile agricultural land is avoided;
 - ii. new uses are subservient in scale to the main agricultural use; and
 - iii. existing buildings are used if possible.

- 3.7 Tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities) is a main town centre use and should, except where in accordance with this policy, be located in town, district or local centres in accordance with Policy C2.
- 3.8 The reference to leisure-based uses in paragraph A and farm diversification in paragraph E does not include uses within Class E to the Town and Country Planning (Use Classes) Order 1987 (as amended), or use as a hot food takeaway, public house or drinking establishment.
- 3.9 The council supports improved canal-based facilities but not the creation of new residential moorings in remote rural locations.
- 3.10 New visitor accommodation, which may be permitted in locations where ordinary residential accommodation would not be, will need to demonstrate that it is viable.

Centres



C1 Rugby town centre

A. Development up to 2042 in Rugby town centre (as shown on the policies map) will include:

- i. the redevelopment of Rugby Central Shopping Centre to restore street-based, mixed-use development (see development sites annex);
- ii. “the Stitch” comprising downgrading for traffic of North Street and part of Church Street and a refreshed Market Place public square;
- iii. redevelopment of Herbert Grey College for residential development;
- iv. a new mixed-use hub with a public square at Old Market Place as part of a cultural quarter; and
- v. a new apartment living quarter in the Station Gateway character area surrounding Rugby Station.

B. Development in Rugby town centre shall accord with the following placemaking principles:

- i. support the town centre’s role as a leisure and entertainment destination including a wide-ranging food and beverage offering;

- ii. create new and improved cycle and pedestrian links, both within the town centre and to surrounding neighbourhoods;
- iii. avoid prejudicing the delivery of the comprehensive redevelopment opportunities which are set out in the Delivery Plan for the Town Centre;
- iv. front onto and provide active ground floor frontages to the town’s street network;
- v. deliver public realm improvements that accord with the Town Centre Public Realm Masterplan;
- vi. deliver high quality urban living; and
- vii. support the enhancement of heritage buildings.

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.

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.



C2 Main town centre uses

A. Except for small rural units in accordance with paragraph B of this policy and proposals that are in accordance with a policy of this plan or a made neighbourhood plan, applications for main town centre uses (including proposals for the subdivision, expansion, creation of mezzanine floors within and removal of restrictions on existing units) outside of defined centres (as listed in the retail hierarchy below and identified on the policies map) and outside of Neighbourhood hubs to which Policy C4 applies will not be permitted unless:

- i. the sequential test set out in national planning policy is satisfied. In applying the sequential test, flexibility on store format and (where the proposal comprises more than one unit) disaggregation shall be shown; and
- ii. where the proposal is for more than 500m² in gross internal floor area, an impact test, prepared in accordance with national policy and guidance, demonstrates that the proposal would not have a significant adverse impact on existing, committed and planned public and private investment in a defined centre nor on the vitality and viability of a defined centre; and

iii. The proposal would be accessible by foot and bicycle and within 400m of a public transport stop.

B. Within the settlement boundaries of the main rural settlements applications for single units in main town centre use with a gross internal area of no greater than 200m² will be permitted subject to their compliance with other policies of this plan.

4.3 Main town centre use is defined in the glossary. The policy gives effect to national 'town centre first policy'. In view of the vulnerability of Rugby town centre, a lower threshold of 500m² for impact testing is retained.

4.4 The retail hierarchy is:

Town/city centre	Rugby	Coventry, Hinckley, Nuneaton, Lutterworth, Daventry
District Centres	Houlton, South West Rugby	
Local centres	Benn, Bilton, Brownsover, Dunchurch, Eden Park, Hillmorton, Houlton, Paddox	

C3 Local and district centres

- A. Within local and district centres as shown on the policies map, the loss of ground floor units which are or were last in main town centre use will not be permitted unless:
- replacement units will be provided as part of the development, or
 - there is demonstrated to be no reasonable prospect of retention of the unit in main town centre use, because it is unviable as demonstrated by a robust viability assessment and all reasonable efforts to secure re-use have been made through marketing of the property for a minimum of 12 months prior to application submission at a valuation reflecting retention or re-provision of main town centre use.
- B. New developments in local centres shall provide active ground floor frontages.
- C. Within and immediately adjacent to district and local centres, new development for main town centre uses will be supported provided it would not have a significant adverse impact on the vitality and viability of Rugby Town Centre.
- D. New centres are allocated at Eden Park, Houlton and South West Rugby as shown on the policies map. These

centres shall be developed with ground floor main town centre uses, usually (where viable) with residential or offices above. Once developed, the main town centre units in these centres will be protected in accordance with this policy.

- 4.5 Local centres provide vital services nearby to residents, are important social spaces and are home to many local businesses. This policy supports the retention and continued success of the borough's district and local centres. Design in district and local centres should accord with the Shopfronts SPD.
- 4.6 It is recognised that deemed permission under The Town and Country Planning (General Permitted Development) Order 2015 means that many conversions of units in district and local centres to residential use can take place without a requirement to apply for planning permission. Nonetheless, it is important that planning policy seeks to protect such units in main town centre use, when planning permission is required.
- 4.7 The policy also seeks to ensure the delivery of new local and district centres at Eden Park and Houlton. A new district centre will also be delivered at South West Rugby as detailed in Policy S8. Once developed, these centres will be protected in accordance with this policy.

C4 Neighbourhood hubs

- A. Within the neighbourhood hubs shown on the policies map the following uses shall be supported:
- i. commercial, business and service uses (Use Class E);
 - ii. learning and non-residential institutions (Class F.1);
 - iii. local community uses (Class F.2); and
 - iv. other community facilities within the meaning given in Policy W1 of this plan.
- B. Within neighbourhood hubs, the loss of ground floor units which are or were last in use as one of the above uses will not be permitted unless:
- i. replacement units will be provided as part of the development, or
 - ii. there is demonstrated to be no reasonable prospect of retention of the unit in its current or last prior use, because it is unviable as demonstrated by a robust viability assessment and all reasonable efforts to secure re-use have been made through marketing of the property for a minimum of 12 months prior to application

submission at a valuation reflecting retention or re-provision of the current or last prior use.

- 4.8 There are 19 neighbourhood hubs. These are locations with small concentrations of units with retail, leisure and community uses that are of importance to a neighbourhood, but which are not fully capable of meeting all essential day-to-day needs. They complement the retail hierarchy by giving people access to local shops and services within walking distance.
- 4.9 The 19 neighbourhood hubs, as shown on the policies map, are: Bilton Road, Brinklow, Cawston, Clifton Road (Central), Clifton Road (Outer), Clifton Upon Dunsmore, Coton Park, Frobisher Road, Hillmorton Road, Kingsway, Long Lawford, Lower Hillmorton Road, New Bilton Outer, Newbold on Avon, Ryton-on-Dunsmore, Stretton-on-Dunsmore, Wolston, Wolvey, and Woodlands.

Environment



EN1 Biodiversity and geodiversity protection

- A. National policy and legislation will be applied in determining planning applications that have potential to harm biodiversity. The mitigation hierarchy in national policy of avoid, mitigate, compensate will be applied.
- B. National policy and legislation will be applied to development that affects a Site of Special Scientific Interest (SSSI), protected species or irreplaceable habitat (such as ancient woodland and ancient or veteran trees).
- C. Development likely to result in harm to or the loss of a Local Wildlife Site, Local Nature Reserve or Local Geological Site will not be permitted unless:
 - i. the need for or benefits of the development demonstrably outweigh the harm to the ecological/geological interest of the site; and
 - ii. it can be demonstrated that the development could not reasonably be located on an alternative site that would cause less harm; and
 - iii. the harm is minimised and mitigated or compensated for in accordance with the mitigation hierarchy.

- 5.1 Detailed legislation, policy and guidance on protecting biodiversity in the determination of planning applications is provided at a national level. It is not necessary to repeat that in this local plan.
- 5.2 There are currently no habitats sites (sites defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017) within or close to Rugby Borough.
- 5.3 The following SSSIs are located within the borough: Brandon Marsh, Coombe Pool, Ryton Wood, Draycote Meadows, Stockton Railway Cutting and Quarry, Brandon Gravel Pits and Wolston Gravel Pits. There are also SSSIs close to the borough boundary in neighbouring authorities including Herald Way March, Calcutt Locks Meadows and Cave's Inn Pits. SSSIs and Local Nature Reserves (LNRs) are mapped on the DEFRA MAGIC map: <https://magic.defra.gov.uk/MagicMap.html>
- 5.4 SSSIs, LNRs, LWSs and LGSs as at plan submission are shown on the policies map. These designations are subject to change. A live map is here: <https://maps.warwickshire.gov.uk/greeninfrastructure/>
- 5.5 Mitigation strategies under this policy should align with the goals in the Local Nature Recovery Strategy.

EN2 Landscape protection

- A. Development shall avoid significant adverse impacts on landscape character and significant adverse visual impacts.
- B. Development proposals must be located and designed to respect scenic quality and maintain a distinctive sense of place.
- C. Development proposals must avoid detrimental impacts on landscape features which make a significant contribution to the character of the area or to the setting of a heritage asset or settlement.

- 5.6 Landscape character is the distinct, recognisable and consistent elements in the landscape that make one landscape different to another. These elements could include for example habitats (woodland etc), historic buildings or features, waterways, trees and veteran trees, and hedgerows.
- 5.7 Proposals for external lighting will often be an important consideration in assessing landscape impact.
- 5.8 There are significant links between this policy and policy D3 (landscaping) which considers the integration of landscape into new development, and D1 which relates to the design of new places.

EN3 Rainsbrook Valley landscape of elevated sensitivity

- A. Within the Rainsbrook Valley landscape of elevated sensitivity as defined on the policies map, development shall comply with paragraphs B to E of this policy.
- B. Protect, reinforce and where possible enhance the landscape character taking into consideration the following landscape factors:
 - i. natural heritage
 - ii. cultural heritage
 - iii. landscape condition
 - iv. associations
 - v. distinctiveness
 - vi. recreational value
 - vii. perceptual scenic and tranquility qualities
 - viii. functional landscape qualities
- C. Safeguard important views within and across the Rainsbrook Valley and minimise adverse visual impacts on the edge escarpment.
- D. Protect and where possible enhance the landscapes and settings of: 'Bilton Grange' and 'Dunchurch Lodge'

registered park and gardens; Rugby Diamond Wood Country Park; and Rainsbrook Cemetery and Crematorium.

- E. Protect and where possible enhance the natural heritage, connectivity and recreational value of Great Central Walk, the Oxford Canal, and the Public Rights of Way Network.

- 5.9 The Rainsbrook Valley is designated as a landscape of elevated sensitivity. The findings of the Rainsbrook Valley Landscape Sensitivity Assessment (2025) justify affording this area a higher degree consideration in decision making.

EN4 Areas of Separation

- A. Areas of Separation are defined on the policies map between Rugby town and the settlements of Clifton upon Dunsmore, Dunchurch and Thurlaston.
- B. Development will only be permitted in these areas when it will not have a significant adverse impact, either alone or in combination with other existing or proposed development, on the effectiveness of an Area of Separation in protecting the identity and distinctiveness of settlements and preventing their coalescence.
- C. Developments that diminish physical and visual separation, have an urbanising influence, or which adversely impact settlement identity should be deemed as having an adverse impact on the effectiveness of an Area of Separation.
- D. Applicants proposing development that may have an adverse impact on an Area of Separation must demonstrate that they have considered this impact and have incorporated appropriate mitigatory measures into their proposal.

5.10 The valued character and identities of the borough's villages are, at least in part, derived from the degree to which they are physically and visually separated from the town. Development within areas between settlements

could diminish this degree of separation or contribute to the eventual coalescence of settlements. To protect against these risks, Areas of Separation have been defined between Rugby town and several of the villages that are in close proximity to it.

5.11 The policy is supported by an Areas of Separation Study (2025) which identifies the factors which are important for preserving separation within each area.

EN5 Biodiversity net gain

A. Biodiversity net gain under Part 6 of the Environment Act 2021 shall be delivered:

- i. on site; or, if the required gain cannot all be delivered on-site;
- ii. off-site in a location as close as feasible to the site that would contribute to habitat connectivity and the biodiversity priorities identified in the Local Nature Recovery Strategy; or if that is not possible
- iii. off-site but within Rugby Borough in a location that would contribute to habitat connectivity and the biodiversity priorities in the Local Nature Recovery Strategy; or
- iv. if it is demonstrated that there are no opportunities to deliver the gain within the borough, through off-site credits elsewhere or as a last resort statutory biodiversity credits.

5.12 The Environment Act 2021 and regulations made thereunder require most developments to deliver a minimum 10% gain on the pre-development biodiversity value of the site. This is calculated using the statutory biodiversity metric published by DEFRA ('the DEFRA metric').

- 5.13 A minimum 10% biodiversity net gain can be delivered on-site, through off-site credits or through statutory biodiversity credits in accordance with the hierarchy.
- 5.14 While the DEFRA metric affords greater weight to gains on site to incentivise local improvements, this policy sets out the council's policy to ensure that gains are delivered locally and in a way that contributes to habitat connectivity and delivery of the Local Nature Recovery Strategy.
- 5.15 Habitat connectivity is important to deliver nature recovery and avoid the fragmentation of gains at too small a scale.
- 5.16 The Local Nature Recovery Strategy is a document published by Warwickshire County Council as the responsible authority. It maps habitats and identifies local biodiversity priorities.

EN6 Canopy cover

- A. All major development, excluding change of use and development in Rugby town centre, shall increase the post-development canopy cover to at least 20% of the site area (excluding areas of the site that are high or very high distinctiveness habitats) unless such requirement is demonstrated to be incompatible with delivering biodiversity net gain requirements on site.
 - B. Where the canopy cover of the site exceeds 20% before development, the proposal should ensure retention of at least the existing level of canopy cover.
 - C. In meeting the requirements of this policy, existing canopy should be retained first, before considering new planting.
 - D. Within Rugby town centre (as defined on the policies map) development shall maximise opportunities for canopy cover and other green infrastructure including green roofs.
- 5.17 Existing canopy cover shall be assessed using a BS5837:2012 tree report. Post-development canopy cover will be calculated based on the projected canopy spread at 25 years post-development using the council's approved calculator.
- 5.18 The council will apply a suitably worded planning condition to require maintenance of the canopy cover post-development.
- 5.19 It is recognised that there may be sites for which achieving 20% canopy is not possible or desirable. In such circumstances the council may negotiate an alternative level of canopy cover.
- 5.20 Increasing canopy cover will have benefits for urban cooling, biodiversity, climate change mitigation and the attractiveness of the area.
- 5.21 In 2023 Friends of the Earth estimated, based on National Forest Inventory data, that just 4.5% of Rugby Borough is woodland. This places Rugby Borough in the bottom 20% of English local authorities for woodland cover. The policy seeks to address that shortfall.
- 5.22 Doick, K.J., Davies, H.J., Moss, J., Coventry, R., Handley, P., VazMonteiro, M., Rogers, K., Simpkin, P. and Council, W.D., 2017, April. *The Canopy Cover of England's Towns and Cities: Baseline and setting targets to improve human health and well-being*. In: Proceedings of the Trees, People and the Built Environment III, International Urban Trees Research Conference, University of, Birmingham, UK (pp. 5-6) recommended a minimum tree canopy cover target of 20%. The same study found, in 2016, that the canopy cover in the town of Rugby was 13.2%.

EN7 Flood risk

- A. The sequential and, if necessary, exception tests set out in national policy and guidance will be applied to all applications for development in areas at a high or medium risk of flooding. This will steer new development to areas with the lowest probability of flooding.
- B. Where development is permitted in areas at risk of flooding it will need, in accordance with national policy and guidance, to be safe for its lifetime without increasing flood risk elsewhere and, where possible, reduce flood risk overall.
- C. The functional floodplain, other areas needed for current or future flood risk management, and areas within 8 metres from the edge of a watercourse or Main River will be safeguarded from built development.

- 5.23 This policy gives effect to national policy and guidance on planning and flood risk. The risk from all sources of flooding will need to be considered taking into account the impact of climate change..
- 5.24 Site specific flood risk assessments must be undertaken and submitted where required in line with national policy and guidance.

- 5.25 All development should be informed by the information and recommendations in the Rugby Borough Level 1 Strategic Flood Risk Assessment (October 2022) or any successor that may be published.
- 5.26 In preparing site specific flood risk assessments developers must use the most up to date flood risk data and guidance.

EN8 Environmental protection and amenity

- A. Development shall not cause or be affected by unacceptable harm to human health, living conditions or the natural environment through air (including odour), water, noise, or light pollution, vibration, insects, vermin, land contamination or instability.
- B. New development shall not have unacceptable impact on the amenity of existing or proposed users or occupants of neighbouring buildings or land and shall provide adequate amenity for the occupants and users of the proposed development in relation to ventilation, daylight, sunlight, privacy, security and avoiding an overbearing impact.

5.27 This policy seeks to avoid unacceptable impacts from pollution. In applying this policy, it will not be the role of planning to duplicate matters that are dealt with by other environmental regulations and permitting regimes.

5.28 The policy also seeks to ensure adequate levels of amenity for building occupiers and users.

5.29 Development proposals on land which is or has been subject to land use(s) which have the potential to have caused contamination of the underlying soils and groundwater require a Preliminary Risk Assessment.

5.30 In planning any development where impact to groundwater may occur, reference should be made to 'The Environment Agency's Approach to Groundwater Protection' document.

EN9 Air quality

- A. Development throughout the borough of more than 1,000m² of floorspace or 10 or more dwellings and development within the Air Quality Management Area that would generate any new floorspace must:
 - i. achieve or exceed air quality neutral standards, or
 - 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.
- B. The impacts of poor air quality can be reduced through:
 - i. the orientation and layout of buildings;
 - ii. abatement technologies; and
 - iii. urban greening.
- C. Where air quality neutral standards are not met, measures to offset any shortfall will be required, according to the following hierarchy:
 - i. on-site measures; then
 - ii. off-site measures; then
 - iii. financial contributions.

- 5.31 This policy accords with national policy which states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas, and the cumulative impacts from individual sites in local areas.
- 5.32 The Air Quality Management Area in Rugby Borough is shown on the policies map.
- 5.33 The council's Air Quality Supplementary Planning Document provides guidance on the application of this policy.

Housing



H1 Housing mix

- A. New housing developments shall contribute to meeting the housing needs of the borough as identified in the Housing Needs Evidence (2025) and any other appropriate local evidence. This means new residential development shall maintain, provide or contribute to a mix of housing tenures, types and sizes to support the creation of mixed, balanced and inclusive communities.
- B. Major developments will accommodate a range of dwelling sizes on site.

- 6.1 The Updated Housing Needs Evidence for Rugby Borough (2025) identifies a mix of different dwelling sizes by tenure needed across the borough as set out in the table below:

	1 bed	2 bed	3 bed	4+ bed
Market housing	5%	30%	45%	20%
Affordable home ownership	15%	40%	35%	10%

	1 bed	2 bed	3 bed	4+ bed
Social or affordable rent (under 65s)	20%	30%	35%	15%
Social or affordable rent (65 and over)	50%	50%		

- 6.2 Proposals for major development will be expected to have regard to this evidence and accommodate a range of unit sizes on site.
- 6.3 Other appropriate local evidence which should inform housing mix would include local housing needs surveys (where they have been prepared), local market factors, and the location and other characteristics of the site.

H2 Affordable housing

- A. 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%
- B. The tenure mix of affordable homes should be 70% social rent and 30% shared ownership.
- C. Development shall integrate affordable housing and market housing to achieve an inclusive and mixed community.
- D. Affordable housing should be provided on-site unless off-site provision or a financial contribution calculated in accordance with paragraph E can be justified. For developments of build to rent homes an off-site financial contribution will be accepted.
- E. The formula for calculating off-site financial contributions is $X = ((A - B) \times C) - ((A \times C) \times D)$ where X = payment in lieu; A = the market value of a square metre

of floorspace in the development; B = the value of affordable housing per square metre of floorspace (reflecting the blend between social rent and shared ownership); C = the number of square metres that would be required on-site to meet the target (adjusted if policy compliance is demonstrated to be unviable); and D = additional developer costs (the difference between the profit applied to market housing and affordable housing; and marketing costs on private housing).

- 6.4 Where sites have been artificially/intentionally split to comprise fewer than 10 homes, they will be treated as a single site for the purposes of calculating affordable housing requirements.
- 6.5 Some developments are unable to viably support policy-compliant levels of affordable housing. In such circumstances a robust open-book viability assessment shall be provided and independently reviewed on behalf of the council. The appraisal should consider whether adjustments to unit size and mix or tenure mix, or reductions in other s106 contributions can increase affordable housing provision.
- 6.6 Where, based on viability, a level of affordable housing is agreed that is below policy-compliant levels, a viability review mechanism in accordance with Policy I4 (Infrastructure and planning obligations) will be applied.

- 6.7 Build to rent housing operates a different financial model to build to sell housing making on-site delivery of s106 affordable housing challenging.
- 6.8 The tenure mix of affordable housing will be subject to input from the council's Housing team. The mix in paragraph B is the council's usual starting point based on Housing Needs Evidence (2025), but there will be cases where a different mix is more appropriate.

H3 Rural worker dwellings

- A. A permanent dwelling for occupation by a person engaged in an agricultural or other land based rural business within the countryside will only be permitted if:
 - i. there is an essential need for the worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside; and
 - ii. the worker would be engaged in a viable rural business; and
 - iii. there is not existing accommodation available locally which could meet the need or be readily adapted to meet that need; and
 - iv. the size of the dwelling is commensurate with the needs of the rural business.
- B. Permissions granted under this policy will be subject to a planning condition or obligation restricting occupancy to rural workers.
- C. Proposals for the removal of rural worker occupancy restrictions will only be permitted where the long-term functional need for the dwelling has ceased and it has been marketed by an independent, reputable land agent for a period of at least 12 months at a realistic price reflecting the occupancy restriction and it can be

evidenced that it has not been possible to dispose of it to a rural worker.

- 6.9 In line with national policy this policy allows rural worker dwellings in countryside locations where there is a demonstrated functional need.
- 6.10 This policy is designed to support the staffing needs of land based rural businesses.

H4 Rural exception sites

- A. Subject to compliance with other policies of this plan and the demonstration of local need for affordable housing, small sites for affordable housing in perpetuity will be permitted on sites adjacent to the edge of an existing settlement, including in the Green Belt.
- B. Where a viability assessment prepared in accordance with the Planning Practice Guidance demonstrates this is necessary to make the scheme viable, up to 20% of the homes on a rural affordable housing exception site may be delivered as market housing.
- C. Proposals for community-led development exception sites and First Homes exception sites (in each case as defined in national policy) will be permitted in locations adjacent to the edge of existing settlements (not including in Green Belt locations) where the relevant requirements of national policy and guidance are satisfied.

support the viability of affordable housing on rural exception sites.

6.11 This policy gives effect to national planning policy on rural exception sites, First Homes exception sites and exception sites for community-led development.

6.12 The policy defines what the local authority considers to be an appropriate proportion of market homes to

H5 Replacement dwellings

- A. The replacement of dwellings outside of settlement boundaries (including in the Green Belt) will only be permitted where:
- i. in the Green Belt, the new dwelling would not be materially larger than the original building (as it existed on 1 July 1948 or, if constructed after that date, as it was originally built); or
 - ii. in non-Green Belt locations, the new dwelling would not be more than 50% larger in volume than the dwelling it replaces; and
 - iii. the existing dwelling has a lawful residential use that has not been abandoned; and
 - iv. if the dwelling is a designated or non-designated heritage asset, the proposal accords with national policy on the total loss of heritage assets; and
 - v. the new dwelling has substantially the same siting as the dwelling it replaces, unless it is demonstrated on design, residential amenity, landscape or other environmental grounds that an alternative siting is more appropriate.
- B. Permitted development rights may be removed from replacement dwellings.

- 6.13 The policy restricts the size of replacement dwellings in the Green Belt in line with national policy. In non-Green Belt locations, a less restrictive approach is justified, but the policy still restricts disproportionate enlargement through replacement due to the negative impact this may have on the countryside.
- 6.14 National policy and legislation on heritage assets will be applied. Landscape impact may be important in the consideration of replacement dwellings in rural areas.
- 6.15 The council's starting point is that a replacement dwelling in the Green Belt would be materially larger than the original building if it exceeds the volume of that dwelling by more than 25%.
- 6.16 Proposals for replacement dwellings will need to comply with other relevant policies of this plan. Of particular relevance are policies H7 (Housing standards), EN8 (Environmental protection and amenity), D1 (Well-designed places), D3 (Landscaping) and D4 (Historic environment).

H6 Specialist housing

- A. The council will support the provision of housing to maximise the independence and choice of older people and those members of the community with specific housing needs, subject to its compliance with other policies of this plan.
- B. Planning conditions or obligations will be applied to ensure future occupation remains for the specialist housing need it was intended.
- C. The housing allocations at South West Rugby; land south of Rugby Road, Brinklow; Dyers Lane, Wolston; and land at Coventry Road, Wolvey shall provide serviced self-build and/or custom build plots as part of the development.
- D. The loss of specialist housing for older people or those with disabilities will not be permitted unless it can be demonstrated that:
 - i. there is no longer a need for the homes; or
 - ii. the use as specialist housing is unviable as demonstrated by a robust viability assessment and all reasonable efforts to secure a new occupier have been made through independent marketing of the property at a valuation

reflecting its current use for a minimum of 12 months prior to application submission.

- 6.18 The proportion of the population aged over 65 is growing, and according to a trends-based projection in the Updated Housing Needs Evidence (2025) is likely to increase by 29% by 2042. The Planning Practice Guidance considers housing for older people and those with disabilities together; as does the Housing Needs Evidence due to a clear link between age and disability. Census data shows that 33.5% of over 65s in the borough have a long-term health problem or disability.
- 6.19 The housing needs of older people and those with disabilities vary considerably, and definitions of different types of housing are set out in the Planning Practice Guidance. The Housing Needs Evidence identifies an existing and projected shortfall of different types of specialist accommodation in both market and affordable tenures. Accordingly sites 337 and 136 are allocated for older persons accommodation.
- 6.20 On average, over the period 2016-2024, 25 entries per year have been added to the borough's self and custom build register. This shows a continued level of demand for self and custom build. Sites 39, 315 and the South West Rugby site will include self and custom build plots.

H7 Housing standards

- A. All new dwellings shall, as a minimum, meet the Nationally Described Space Standards.
- B. All new dwellings shall meet the requirements for Category 2 – accessible and adaptable dwellings set out in Part M4(2) of Schedule 1 to the Building Regulations 2010 (as amended).
- C. On developments of 10 or more homes, 3.5 per cent of dwellings shall meet the requirements for Category 3 – wheelchair user dwellings set out in Part M4(3) of Schedule 1 to the Building Regulation 2010 (as amended).
- D. For houses, a rear or side garden shall be provided of at least 7 metres in depth and of at least the following sizes:
 - i. for a 2 bedroom house 60m²;
 - ii. for a 3 bedroom or larger house 80m².
- E. For apartments and houses in multiple occupation a minimum of 5m² of private outdoor space must be provided per bedroom.

6.22 The standards set out in this policy apply to Use Class C3 dwelling houses and to Use Class C4 and sui generis houses in multiple occupation. The standards apply

equally to new homes created through change of use, sub-division and amalgamation as they do to new build homes.

- 6.23 The application of space standards ensures that new homes are of an adequate minimum size.
- 6.24 The Updated Housing Needs Evidence for Rugby Borough (2025) recommends that, in view of the borough's ageing population, all new dwellings meet the M4(2) standard and 3.5 per cent of new dwellings meet the Part M4(3) standard. Building to these standards will ensure that new dwellings meet the needs of the borough's ageing population and those living with long-term ill health and disability.
- 6.25 In specific, exceptional cases where all dwellings on a site cannot meet all Category 2 requirements, robust justification must be demonstrated and, where accepted, exemptions will be limited to the minimum number of dwellings necessary. Where full compliance with all requirements of Category 2 cannot be met, designs will meet requirements as far as practicable. For example upper floor dwellings that will not have step-free access from the street will meet all other Category 2 requirements and ground floor dwellings in the same development will meet all relevant requirements.

- 6.26 The requirement for private outdoor space for apartments and HMOs can be provided in part or in full as communal areas and/or private balconies. Minimum garden and shared communal areas do not include parking areas and must benefit from a reasonable level of privacy.
- 6.27 In calculating rear garden depths, an important consideration will be ensuring adequate separation distances between properties in line with published council guidance.

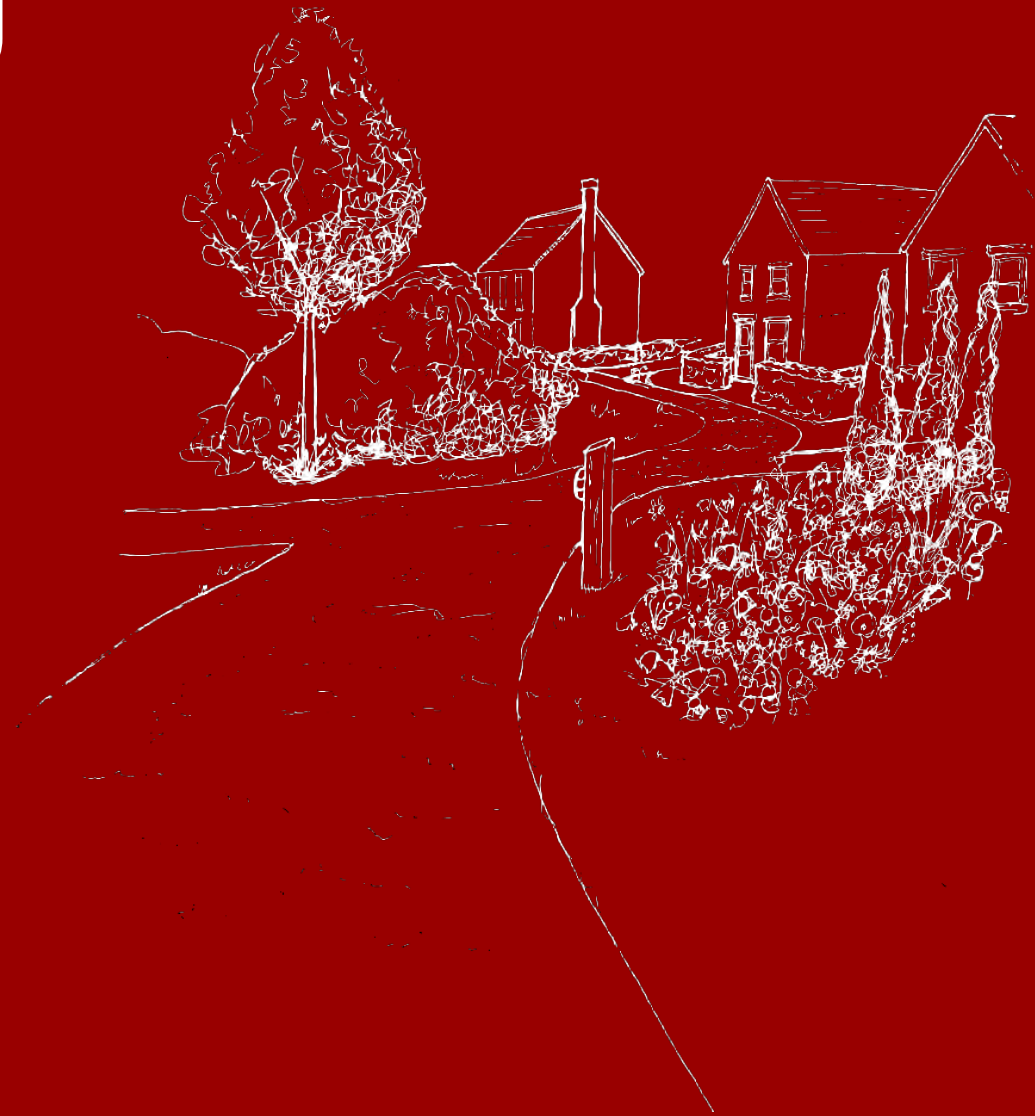
H8 Houses in multiple occupation

- A. Where 10% or more of dwellings within a 100 metre radius of the centre point of the application site are houses in multiple occupation (HMOs), an application for the creation of a HMO on the application site will not be permitted. Where fewer than 10% of dwellings within a 100 metres radius of the centre point of the application site are HMOs, an application for the creation of a HMO on the application site will be considered against the criteria in paragraph B.
- B. The development of a HMO must not result in a non-HMO dwelling being sandwiched between two HMOs and must not lead to a continuous frontage of three or more HMOs. Sandwiching includes:
- i. three or fewer dwellings in a street located between two single HMO properties; or
 - ii. a residential flat within a sub-divided building where the majority of flats are HMOs; or
 - iii. a residential flat within a sub-divided building in a street located between two other subdivided buildings with at least one HMO flat in each building;

- iv. a residential flat within a sub-divided building located between two HMO flats above and below; or
- v. a residential flat within a sub-divided building located between two HMO flats on both sides.

- 6.28 Rugby town has experienced growth in the number and concentration of Houses in Multiple Occupation (HMOs), particularly within areas of central Rugby. In contrast to other parts of the country where HMOs are often student housing, it seems that most residents of HMOs in Rugby Borough are adults in work, and this may be linked to the growth of major employment sites near to the town.
- 6.29 Policy H8 is designed to avoid or limit concentrations of HMOs which may be considered harmful, whether small HMOs (use class C4), or larger HMOs (use class sui generis). It should be applied when considering any planning proposal for the conversion to or construction of HMO accommodation within the borough, including in the area of central Rugby which is subject to an Article 4 Direction. In calculating concentrations of HMOs, the location of existing HMOs will be based on best available evidence.

Wellbeing



W1 Protection of community facilities

- A. A proposal that would result in the loss of a community facility or other service that contributes to the sustainability of the local area will not be permitted except where the applicant demonstrates that:
- i. alternative provision of equivalent or better quality, that is easily accessible to that local community, is available or will be provided prior to commencement of redevelopment; or
 - ii. there is no reasonable prospect of retention of the existing use as it is unviable as demonstrated by a robust viability assessment and all reasonable efforts to secure suitable alternative business or community re-use have been made through independent marketing of the property at a valuation reflecting its current use for a minimum of 12 months prior to application submission.
- B. The council supports the restoration of Coventry Stadium, Brandon for speedway and stock car racing and other motor sports together with other community uses. Planning permission will not be granted for development proposals which would conflict with these objectives.

- 7.1 Community facilities covered by this policy include public houses, post offices, libraries, play areas, places of worship, local food shops, community halls and centres, indoor and outdoor sports facilities and cultural buildings.
- 7.2 Sports facilities include (without limitation) the following sports facilities of borough-wide significance: Coventry Stadium, Brandon; The Queen's Diamond Jubilee Centre and Rugby & Northampton Athletic Club; The Rugby Football Club and Rugby Cricket Club; Rugby Town FC, Butlin Road; Rugby Borough Football Club.
- 7.3 The policy gives local effect to national policy on the protection of community facilities.
- 7.4 The provision of new community facilities is supported subject to compliance with other policies of this plan.
- 7.5 Many community facilities, with the exception of public houses, shops and cultural buildings, are not main town centre uses. The town centre first policy would not apply to the provision of such uses.
- 7.6 This policy will also be applied to community facilities required to be delivered by other policies of this plan.

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

B. Provision/contributions will not be required for a typology where both:

- i. existing open space provision in the ward in

which the site is located exceeds the relevant standard and will continue to do so after the proposed development; and

- ii. the existing provision is within the applicable access distance of the site and is of satisfactory quality.

C. On site provision is preferred. Where off-site provision is justified due to site constraints, contributions to provision and maintenance will be calculated in accordance with Appendix 3 and will be spent in a location accessible to the site.

D. Where public open space is provided on site and is to be adopted by the council, contributions towards maintenance calculated in accordance with Appendix 3 will be required.

E. The need for contributions to sport pitch provision will be assessed based on the Playing Pitch & Outdoor Sport Strategy.

F. Subject to compliance with Policy W1, national policy on the protection of existing open space, and sports and recreational buildings and land, including playing fields, will be applied.

7.7 Open space can contribute to on-site delivery of biodiversity net gain.

Design



D1 Well-designed places

A. New development shall create or contribute to well-designed places. Development that is not well-designed will not be permitted.

B. All development shall (where applicable):

- i. respond appropriately to context and character (including historical as well as physical characteristics) in its build form, layout, orientation, density/grain, height, materials and massing;
- ii. maximise connections beyond the site, for people and nature;
- iii. create connected, legible and permeable public spaces;
- iv. integrate and reuse existing natural and built assets within the site as far as possible, and where appropriate respond to natural and built assets beyond the site;
- v. comprise visually attractive buildings and spaces;
- vi. have an appropriate relationship with and enclosure to the street;

- vii. incorporate well-designed parking, cycle and waste storage, servicing and utilities infrastructure;
- viii. demonstrate efficient use of land, energy and water through the design, construction and management of buildings and spaces;
- ix. create robust and adaptable buildings and spaces taking account of future maintenance; and
- x. maintain high quality design integrity through the design and development stages.

8.1 This overarching policy sets out high-level design principles for all new development across the borough. It will be supported by local design codes and guides which will provide further detail on the design requirements for development. Development proposals will need to respond to the 10 characteristics of well-designed places outlined in the National Design Guide, some of which overlap with other policies of this plan.

D2 Infill and householder development

A. Infill and householder development shall incorporate (as appropriate) features and characteristics which are repeated in the street scene (or street scenes in the case of a corner plot), so that the development appears cohesive when viewed in the context of the street or streets. This may include:

- i. plot and building width;
- ii. front building line;
- iii. gaps between buildings;
- iv. height, scale and mass;
- v. proportions;
- vi. size and arrangement of windows;
- vii. materials and details;
- viii. boundary treatments; and
- ix. parking.

B. Extensions and alterations to existing dwellings shall:

- i. be of overall high-quality design;
- ii. be subservient in scale and character to the host building, including its roof-form;

- iii. integrate with the existing property, reflecting its features and characteristics, including (but not limited to) proportions of openings, alignment, materials, and detailing;
- iv. ensure that adequate outdoor amenity space is retained for the use of occupiers of the enlarged property in line with policy H7;
- v. safeguard the amenity of neighbouring occupiers in line with policy EN8; and
- vi. safeguard access, parking (in accordance with policies I1 and I2) and servicing required for the extended dwelling.

8.2 “Householder” and “infill” development are defined in the glossary.

8.3 Infill development should take cues from the characteristics of the street scene in which it is located.

8.4 In most circumstances, it will be appropriate for extensions and alterations to reflect the characteristics of the existing building. In some instances, more innovative remodelling of the appearance of the existing building may be appropriate. This will be supported where design quality is high and would complement rather than detract from the street context.

D3 Landscaping

- A. Proposals should integrate landscape from the outset, and be landscape led.
- B. Development proposals shall where possible retain and integrate existing natural features and assets.
- C. Retained natural features, new public realm (streets and public spaces) and new soft landscaping must form structuring elements of a cohesive development layout.
- D. Landscaping shall be appropriate to its context and respond to landscape character.
- E. Landscaping shall use robust materials and predominantly native planting.
- F. Opportunities should be taken to reconnect fragmented habitats.
- G. Street trees and soft landscaping shall be incorporated into street design.
- H. Front boundary treatments should reinforce the prevailing character of the street.
- I. Where development borders open landscape, development edges should be predominantly outward facing and avoid a harsh transition to the adjacent space.

- J. Arrangements for the long-term maintenance of landscaped areas must be put in place.

- 8.5 Landscape design encompasses the design of streets, public spaces (both hard and soft landscaped), and private external spaces. As such, it is intrinsic to the 10 characteristics of a good place, outlined in the National Design Guide. It is particularly relevant to major development proposals, although its principles may also be applicable to smaller scale schemes.
- 8.6 Existing natural features and assets may contribute to biodiversity and the visual attractiveness and distinctiveness of the place. New hard and soft landscaping contributes to the character and distinctiveness of places.
- 8.7 In addition to policy D1, this policy should be read in conjunction with policies EN1 (Biodiversity and geodiversity protection), EN2 (Landscape protection), EN5 (Biodiversity net gain), D5 (Sustainable drainage), and EN6 (Canopy cover) due to significant links between these topics.
- 8.8 There are multiple benefits associated with high quality landscape design, including greener, more climate resilient spaces, supporting biodiversity, encouraging active travel, and supporting wellbeing.

D4 Historic environment

- A. National policy and legislation will be applied in the consideration of development proposals which have the potential to affect the significance of a heritage asset and its setting.
- B. Development that sustains and enhances the significance of heritage assets and their settings will be supported.
- C. Applications with the potential to affect the significance of a heritage asset including the contribution made by its setting will be required to provide sufficient information and assessment (such as desk-based appraisals, field evaluation, and heritage impact assessments) to allow an understanding of the impacts of the proposal on the significance of heritage assets and their setting.

- 8.9 Policy D4 gives effect to national policy and legislation on the historic environment.
- 8.10 The policy seeks to ensure the proper assessment and understanding of the significance of a heritage asset and the contribution of its setting in the development process.
- 8.11 The Warwickshire Historic Environment Record, the borough's Conservation Area Character Appraisals and

Management Plans, and the Warwickshire Historic Towns Study and Historic Landscape Characterisation Study are examples of sources of information that will be used to inform the consideration of future development including potential conservation and enhancement measures.

- 8.12 Design responses to heritage assets need to be sensitive and complimentary to their surroundings. However, this does not require merely replicating existing styles and imitating architectural details; modern interpretation is possible if informed by a full contextual analysis and if it promotes and reinforces local distinctiveness.
- 8.13 The council will take a positive approach to sustaining and enhancing the significance of heritage assets. It will support proposals that make a positive contribution to character and distinctiveness and support viable uses of heritage assets which are consistent with their conservation.
- 8.14 The council will use its available powers and seek to work with landowners and developers to improve the condition of heritage assets that are at risk.

D5 Sustainable drainage

- A. All developments that create a need for surface water drainage shall include Sustainable Drainage Systems (SuDs) for the management of surface water run-off (including from roofs), unless proven to be inappropriate.
- B. SuDs shall:
 - i. be located outside the floodplain;
 - ii. integrate with green infrastructure;
 - iii. be sufficient for the needs of the site;
 - iv. promote enhanced biodiversity;
 - v. improve water quality; and
 - vi. provide good quality open spaces.
- C. Infiltration SuDs are preferred. The developer shall carry out infiltration tests and a groundwater risk assessment to ensure that this is possible without polluting groundwater.
- D. Where it is proven that infiltration is not possible, surface water should be discharged into a watercourse (in agreement with the Lead Local Flood Authority) at pre-development greenfield run off rates or into a surface water sewer if there is no nearby surface water body.

- E. SuDs schemes shall have a maintenance schedule detailing maintenance boundaries, responsible parties, and arrangements to ensure management in perpetuity.
- F. In exceptional circumstances, where SuDs cannot be provided, it must be demonstrated that:
 - i. an acceptable means of surface water disposal is provided which does not increase the risk of flooding or give rise to environmental problems; and
 - ii. if located in an area known to suffer surface water flooding, the development will contribute to an off-site strategic solution.

8.16 SuDS are an approach to managing surface water run-off which mimics natural drainage systems and retains water on or near the site. SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SuDS reduce flood risk, promote groundwater recharge, and improve water quality and amenity.

8.17 Sustainable Drainage Systems (SuDS) should be designed in accordance with The SuDS Manual, CIRIA (C753) and Warwickshire County Council's Flood Risk Guidance for Development. They should meet 'Groundwater protection position statements'.

Infrastructure



11 Transport

- A. Development shall be designed in accordance with the transport user hierarchy outlined in the Warwickshire Local Transport Plan, prioritising active travel. Where possible development proposals shall contribute to delivery of the Local Transport Plan and Local Cycling and Walking Infrastructure Plan (or their successors).
- B. Development shall:
- i. be located where car travel can be minimised and opportunities for walking, cycling and public transport can be maximised;
 - ii. provide suitable and safe access by all modes;
 - iii. fully mitigate adverse impacts on the operation and safety of the highway network;
 - iv. provide safe and convenient active travel routes within and connecting out from the development, including, if necessary, contributing to upgrading or creating new routes;
 - v. provide convenient access to public transport;
 - vi. for residential development, provide direct, clear, safe and convenient walking and cycling links to existing and proposed local facilities; and

- vii. create a permeable, connected street network which 'plugs in' to the existing street network. Street layouts should avoid preventing future connectivity where the potential to develop adjacent land in future exists. Cul-de-sacs should not be used except where a site cannot be serviced any other way. Instead, through traffic should (if necessary) be removed through modal filters like trees or bollards which allow pedestrians and bicycles to pass.

- 9.1 The objective of this policy is to promote active travel (including horse riding) and public transport use, while ensuring safe access and mitigating adverse impacts on the highway network. Facilitating alternatives and managing the growth of vehicular traffic resulting from development is important, because of its adverse impacts on air quality, noise, vibration, road safety, greenhouse gas emissions and traffic congestion.
- 9.2 Wherever possible, development must include realistic, safe and convenient alternatives to the private motor vehicle, particularly for local journeys.

I2 Parking

- A. Appropriate and secure parking shall be provided for bicycles and vehicles (including motorcycles) in accordance with the parking standards in Appendix 2. This will include the provision of vehicle parking to meet the needs of people with disabilities or impaired mobility.
- B. Development layouts shall ensure that cycle parking is conveniently located close to the entrance(s) of the buildings it serves and is well overlooked, covered and secure.
- C. Development layouts shall ensure that vehicle parking is well related to the building it serves, provides safe access and egress, is adequately sized and is not visually dominant within the street scene.

- 9.3 Cycle parking provision is important to supporting active travel. Provision of adequate cycle storage in convenient locations is therefore a significant component of this policy.
- 9.4 Vehicle parking is often an important component of residential and non-residential development. It is however important to strike a balance. Too much vehicle parking can make inefficient use of land and discourage use of alternative sustainable forms of travel. Too little

parking can result in vehicles parked in inappropriate places, with potential highway safety impacts and neighbour disputes.

- 9.5 In light of the above, cycle parking standards set out in Appendix 2 should be considered as a minimum.
- 9.6 Vehicle parking standards should generally be complied with, though may be applied flexibly where there is appropriate evidence and reasoned justification for more or less vehicle parking, for example where car club provision is secured through a s106 agreement.
- 9.7 Parking provision for people with disabilities should be proportionate to the amount of overall vehicle parking spaces as outlined in Appendix 2.

I3 Communications infrastructure

- A. Communications infrastructure will be permitted where justified and in accordance with national policy and other policies of this plan.
- B. Proposals for new sites for electronic communications infrastructure must demonstrate that no opportunities exist for using or upgrading existing sites.
- C. Proposals for residential and commercial development which are major developments shall include full fibre broadband connections unless this is demonstrated not to be possible.

- 9.8 This policy gives local effect to national planning policy on supporting high quality communications.
- 9.9 The policy seeks to ensure the delivery of high-speed broadband to support the economic success of the borough. This is particularly important with the shift to more home working.

14 Infrastructure and planning obligations

- A. New development that exceeds the capacity of existing infrastructure or causes unacceptable impacts will only be permitted where it can be demonstrated that there is a reliable mechanism in place to deliver the requisite infrastructure upgrades when required and to mitigate the impacts.
- B. Planning obligations may include retrospective contributions towards infrastructure improvements which have been fully or partly delivered at the date the relevant obligation is entered into, but which deliver necessary mitigation for the proposed development.
- C. Where a planning obligation for the delivery of affordable housing would deliver less than the minimum policy requirement for affordable housing the council will include mechanisms for mid development and/or post development viability reviews which may result in the requirement to deliver additional affordable housing.
- D. Developments of 50 or more homes and commercial developments of 10,000m² or more in floorspace will be required to provide employment and skills plans to deliver opportunities for local residents to access employment and training.

- 9.10 It is essential that adequate infrastructure capacity exists to accommodate new development. The policy provides a basis for requiring the delivery of necessary infrastructure upgrades to meet the additional demand generated by new development. Such infrastructure may include (amongst other things) school places, transport, water supply/wastewater, flood defences, health facilities, public open spaces and community facilities.
- 9.11 Reliable mechanisms to deliver infrastructure may include planning conditions, planning obligations or secured public funding.
- 9.12 Where it is not possible to address unacceptable impacts of development through planning conditions, a planning obligation may be required. Paragraphs B and C of the policy make provision for retrospective contributions towards infrastructure and for the viability review of affordable housing planning obligations.
- 9.13 Employment and skills plans will contribute towards the delivery of the council's Economic Strategy. Employment and skills plans will need to cover the construction of the development and, for commercial development, ongoing employment and training in the operational phase.

I5 New railway stations

- A. Land as shown on the policies map is safeguarded to support the delivery of the proposed Nuneaton Parkway and Rugby Parkway railway stations.
- B. Planning permission will not be granted for development that would prejudice the construction or operation of the railway stations including their proposed car parks and access roads.

- 9.14 National policy states that planning policies should identify and protect sites and routes which could be critical in developing infrastructure to widen transport choice.
- 9.15 Nuneaton Parkway Station is being promoted by Warwickshire County Council. It is also identified as a priority scheme by Midlands Connect and is identified in the West Midlands Rail Executive Rail Investment Strategy for delivery between 2031 and 2040.
- 9.16 A feasibility study and site selection exercise has been undertaken by Warwickshire County Council.
- 9.17 The proposals for Rugby Parkway station are more advanced with a planning application having been submitted.

Appendices

Appendix 1 Housing trajectory

Site	Units to deliver	2025 -26	2026 -27	2027 -28	2028 -29	2029 -30	2030 -31	2031 -32	2032 -33	2033 -34	2034 -35	2035 -36	2036 -37	2037 -38	2038 -39	2039 -40	2040 -41	2041 -42
South West Rugby	3900 (3050 in plan period)		35	65	170	242	283	338	338	338	288	253	238	208	203	198	178	130
Eden Park	602	52	10	55	55	55	55	55	55	55	55	50	50					
Houlton	4297 (3060 in plan period)	124	197	219	265	240	241	220	160	154	155	155	155	155	155	155	155	155
Other 2019 Local Plan Allocations	205	82	28	20	20	15	25	15										
Extant permissions as of 1 April 2025	621	259	102	70	40	28	40	82										
Windfalls for sites <5 dwellings	850	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
New allocations	2886				25	264	378	255	345	345	300	225	255	210	114	80	50	40
Total Trajectory		567	422	479	625	894	1072	1015	948	942	848	733	748	623	522	483	433	375

Appendix 2 Parking standards

Standards for vehicle and cycle parking are defined by use class. Where no standard is specified for the type of development proposed, the appropriate parking level will be considered on its own merits.

The parking standards are based on spaces per square meter of Gross Internal Area (GIA) unless otherwise stated. The GIA is the total internal floorspace of a development.

Car Parking

New developments will normally be required to provide vehicle parking in compliance with the standards set out in this appendix. Under or over provision must be justified with appropriate evidence. For some uses, different standards are set within the high access zone. This is shown on the policies map and on the map below.

Car parking spaces will need to achieve the minimum dimensions in the table below (or such larger sizes as Warwickshire County Council (WCC) may require). These align with WCC's design guide and enable sufficient space to park and enter/exit vehicles. Additional width is required for spaces restricted on one or both sides by a fence, wall, or other obstruction, as these allow less flexibility to open car doors.

Single parking space (unrestricted)	Parking space restricted on one side	Parking space restricted on two sides	Garages and car ports
2.5 x 5.5 m	3 x 5.5 m	3.5 x 5.5m	3.5 x 6m

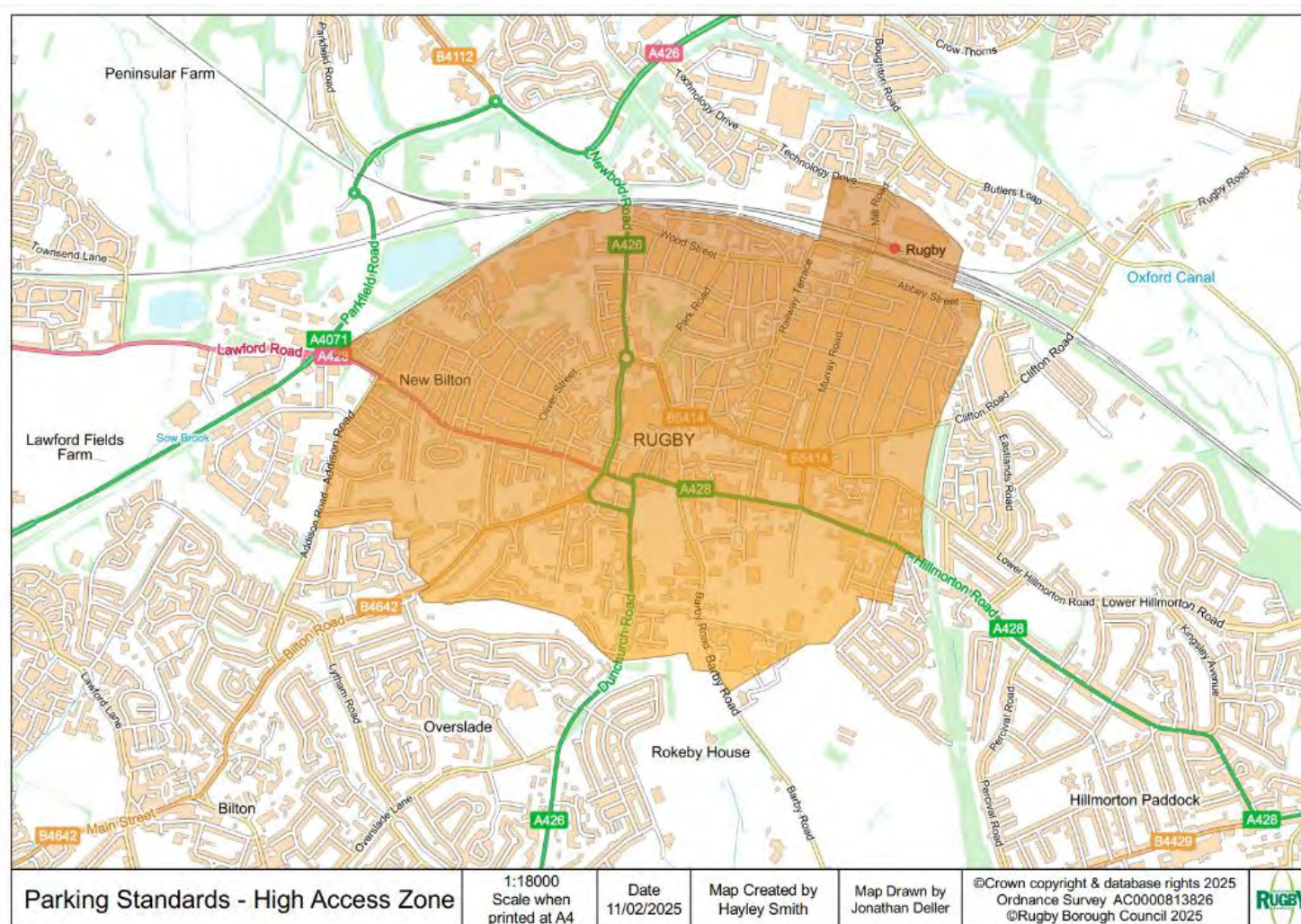
Where residential parking is provided on plot, it may be necessary to ensure there is sufficient space to manoeuvre past a parked car with wheelie bins and bicycles, depending on the location of storage for such items.

Electric Vehicle charging

Electric vehicle charging points shall be provided in accordance with Building Regulations.

Cycle Parking

Cycle parking in compliance with these standards should be provided on new developments as a minimum.



Use Class B				
Type	Car parking	Cycle parking		Notes/other considerations
		Long stay - staff	Short stay - visitors	
B2 General Industrial	1 space/90 sq.m	1 stand/500 sq.m	1 stand/ 1000 sq.m	Long stay cycle parking is to be at least the greater of the spaces per GFA identified or 1 space per 8 staff. These standards do not take into account commercial vehicle parking standards, which will be considered on the basis of individual planning applications.
B8 Storage and Distribution	1 space/120 sq.m	1 space/1000sq.m	1 stand/500sq.m	

Use Class C1 – Hotels and hostels					
Type	Car parking		Cycle parking		Notes/other considerations
	Low access	High access	Long stay - staff	Short stay - visitors	
Hotels/motels/guest houses/boarding houses	1 space/bedroom	0.5 spaces/bedroom	1 stand/full-time staff	1 stand/10 beds	Facilities within such developments that could be available to non-residents (e.g. conference facilities and eating and drinking) should be treated separately.

Use Class C2 – Residential institutions					
Type	Car parking standard		Cycle parking		Notes/other considerations
	Low access	High access	Long stay - staff	Short stay - visitors	
Residential care home	1 space/4 residents	0.5 spaces /4 residents	0.05 space per bedroom	0.05 space per residential unit	Space for an ambulance should be incorporated into the layout. This should be as close as possible to the main entrance of the establishment and not impede site access.
Homes for adults and children with learning or physical disabilities	1 space/resident staff + 0.5 spaces/non-resident staff + 0.5 spaces/client for visitors		0.05 space per bedroom	0.05 space per residential unit	The parking standard for non-residential staff applies to non-residential staff on duty at the busiest time. Due to the nature of this use, a reduction for high accessibility is not appropriate.
Residential schools, colleges or training centres	1 space/4 residents	0.5 spaces /4 residents	Each case considered on its own merits	Each case considered on its own merits	

Use Class C3 – dwellings					
Type	Car parking		Cycle parking		Notes/other considerations
	Low access	High access	Long stay - residents	Short stay - visitors	
Houses (detached, semi-detached, terraced, bungalows)					
1-2 bed dwelling	1.5 spaces/dwelling	0.75 spaces/dwelling	1 space/bedroom secure and under cover	N/a	Where there is a solid wall or boundary structure on one side, the width of the space should increase to a minimum of 3m, and if enclosed on two sides by a wall or boundary treatment it should increase further to 3.5m. This is to ensure that occupiers can park and open car doors on both sides. Garages may only be included as part of the parking space provision where they follow the minimum internal dimensions specified above.
3 bed dwelling	2 spaces/dwelling	1 space/dwelling	1 space/bedroom secure and under cover	N/a	
4+ bed dwelling	3 spaces/dwelling	1.5 spaces/dwelling	1 space/bedroom secure and under cover	N/a	

Dwelling apartments/flats/maisonettes					
Studio apartments	1 space/dwelling	0.5 spaces/dwelling	1 space/dwelling secure and under cover	N/a	Where apartments are provided through the conversion of an existing building or new build apartments are proposed in the Rugby urban area and no on plot parking is possible, the standard will be considered flexibly.
1-2 bed apartments	1.5 spaces/dwelling	0.75 spaces/dwelling	1 space/bedroom secure and under cover	N/a	
3+ bed apartments	2 spaces/dwelling	1 space/dwelling	1 space/bedroom secure and under cover	N/a	
Dwellings for Elderly Persons					
Active elderly: sheltered housing/age restricted housing/retirement housing	1 space/dwelling	0.5 spaces/dwelling	0.05/bedroom secure and under cover	0.05/bedroom	
Sheltered housing with resident warden	0.5 spaces/dwelling	0.25 spaces/dwelling	0.05/bedroom secure and under cover	0.05/bedroom	

Houses in multiple occupation (C4 or sui generis)					
	Car parking		Cycle parking		Notes/other considerations
	Low access	High access	Low access	High access	
HMO	1 space/bedroom	0.5 spaces per bedroom	1 space/2 bedrooms	1 space/bedroom	Vehicle and cycle parking space should

					be provided in the curtilage wherever possible. Where a property is proposed to be converted to a HMO and no on plot parking is possible, the standard will be considered flexibly.
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Commercial, business and services (Class E)					
Type	Car parking		Cycle parking		Notes/other considerations
	Low access	High access	Long stay - staff	Short stay - visitors	
(a) – Non-food retail and general retail	1 space/20sq.m	1 space/50sq.m	Small (<200m ²): 1/100sq.m Medium (200-1000sq.m): 1/200sq.m >1000sq.m: 1/500sq.m	Small (<200m ²): 1/100sq.m Medium (200-1000sq.m): 1/200sq.m >1000sq.m: 1/250sq.m	In Rugby town centre where there is usually sufficient parking provision for existing and predicted demand from the proposed development, there will be no additional parking required.
(1) Food retail	1 space/14sq.m	1 space/50sq.m	Small (<200m ²): 1/100sq.m Medium (200-1000sq.m): 1/200sq.m >1000sq.m: 1/500sq.m	Small (<200m ²): 1/100sq.m Medium (200-1000sq.m): 1/200sq.m >1000sq.m: 1/250sq.m	

(b) – Food and drink which is mostly consumed on the premises	1 space/5sq.m	1 space/10sq.m	Greater of 1 space per 6 staff or 1 per 40sq.m	1 stand per 20sq.m	
(c) – financial services, professional services, other services	1 space/30sq.m	1 space/50sq.m	Greater of 1 space per 6 staff or 1 per 300sq.m	1 stand per 200sq.m	
(d) – indoor sport and recreation (excluding swimming pools, skating rinks, motor or firearms)	1 space/ 3 staff + 1 space/30sq.m playing area	0.5 spaces/3 staff + 0.5 spaces/30sq.m playing area	Greater of 1 space/6 staff or 1 space/40sq.m	1 space/20sq.m	
(e) Medical services not attached to the home of the practitioner	4 spaces/consulting room	2 spaces/consulting room	Greater of 1 space/2 consulting rooms or 1 space/6 staff	1 stand/consulting room	
(f) Non-residential creche, day centre or nursery	1 space/staff member (FTE)	0.5 spaces/staff member (FTE)	1 stand/6 FTE staff		
(g) (i) office	1 space/30sq.m	1 space/60sq.m	1 stand/200sq.m	1 stand/1000sq.m	
(g) (ii) research and development	1 space/40sq.m	1 space/80sq.m	1 stand/250sq.m	1 stand/500sq.m	
(g) (iii) any industrial process which can be carried out in a residential area without causing detriment to the area	1 space/40sq.m	1 space/80sq.m	1 stand/150 sq.m	1 stand/500sq.m	

Use Class F1 – Learning and non-residential institutions					
Type	Car parking standard		Cycle parking standard		Notes/other considerations
	Low access	High access	Long stay - staff	Short stay - visitors	
(1) Provision of education (schools, 16+ colleges and further education)	<i>Staff and visitors:</i> 2 spaces/classroom	<i>Staff and visitors:</i> 1 space/classroom	Based on travel plan mode share. Minimum 1/20 staff and 1/10 students.		Student and parent vehicle parking to be considered on a case-by-case basis. Catchment areas will be taken into account for schools. Facilities for picking up and setting down pupils may be provided or as determined by the Travel Plan.
(2) Public worship or religious instruction	1 space/5 fixed seats or 1 space/10sq.m	0.5 spaces/5 fixed seats or 0.5 spaces/10sq.m	1/5 employees	Greatest of 1/50sq.m or 1/30 seats/capacity	

Use Class F2 – Local community					
Type	Car parking standard		Cycle parking standard		Notes/other considerations
	Low access	High access	Long stay - staff	Short stay - visitors	
(1) Shops (mostly) selling essential goods, including food, where the shop's premises	1 space/FTE staff + 1 space/30sq.m		1 space/30sq.m	1 space/30 sq.m	This use is a local shop by nature so vehicle parking standard should be considered flexibly.

do not exceed 280sq.m and there is no other such facility within 1000m					
(2) Halls or meeting places for the principal use of the local community	1 space/FTE staff + 1 space/30sq.m		1/5 staff	Greatest of 1/50sq.m or 1/30 seats/capacity	In Rugby town centre where there is existing public parking that can accommodate existing and predicted demand, additional parking may not be required.
(3) Areas or places for outdoor sport or recreation (not involving motorised vehicles or firearms)	Playing fields: 12 spaces/ha pitch area	6 spaces /ha pitch area	Greater of 1 space/6 staff or 1 space/5ha pitch area	1 space/ha pitch area	Other on-site facilities such as club house, and eating/drinking establishments are to be treated separately.
	Tennis courts/squash courts: 3 space/court	1.5 spaces/court	Greater of 1 space/6 staff or 1 space/5 courts	1 space/court	
(4) Indoor or outdoor swimming pools or skating rinks	1 space/3 staff + 1 space/10sq.m of the hall or pool area	0.5 space/3 staff + 0.5 space/10sq.m of the hall or pool area	Greater of 1 space/6 staff or 1/40sq.m	1 space/20sq.m	

Sui Generis					
Type	Car parking standard		Cycle parking standard		Notes/other considerations
	Low access	High access	Long stay - staff	Short stay - visitors	
Cinemas, theatres, concert halls, bingo halls	1 space/5 seats	1 space/10 seats	1 space/5 staff	Greatest of 1/50sq.m or 1/30 seats/capacity	In Rugby town centre where there is usually sufficient parking provision for existing and predicted demand from the proposed development, there will be no additional parking required.
Hot food takeaway	1 space/5sq.m	1 space/10sq.m	Greater of 1 space/6 staff or 1/40sq.m	1 space/20sq.m	Car parking standards may be relaxed or waived where there is public parking readily available nearby.
Public house, wine bar or drinking establishment	1 space/3sq.m	1 space/10sq.m	Greater of 1 space/6 staff or 1/40sq.m	1 space/20sq.m	Car parking standards may be relaxed or waived where there is public parking readily available nearby.
Sale or display of motor vehicles	Car sales – staff: 1 space/FTE staff Car sales – customers: 1 space/10 cars on display		Greater of 1 space/8FTE staff or 1 space/250sq.m	1 space/500sq.m	Due to the nature of this use, a reduction according to

				accessibility is not appropriate.
Motor vehicle workshop	Staff: 1 space/45sq.m Customers: 3 spaces/service bay	Greater of 1 space/8FTE staff or 1 space/250sq.m	1 space/500sq.m	Due to the nature of this use, a reduction according to accessibility is not appropriate.

Parking for people with disabilities

Parking for people with disabilities should be additional to the parking standards outlined above. The total number of spaces required by the standards shall include the following:

Employment generating businesses and hotels	
Up to 25 places	1 space
Up to 50 places	2 spaces
Up to 75 places	3 spaces
Up to 100 places	4 spaces
Each subsequent 100 spaces or part of 100	1 extra space
Public buildings and shops	
Up to 25 places	1 space
Up to 50 places	3 spaces
Up to 100 places	5 spaces
Each subsequent 100 spaces or part of 100	3 extra spaces
Other uses	
Under 50 spaces	1 space. Remaining provision on its own merits
Over 50 spaces	4%

Reserved spaces should be clearly designated for use by people with disabilities and they should be clearly signposted. The pedestrian route from the parking spaces to the point of entry should be clearly defined and well lit.

Pathways should be a minimum width of 1.2m and where possible 1.8m to allow wheelchairs to pass. A greater width may be required if large pedestrian flows are anticipated. Path edges should be clearly defined and slip resistant surfaces should be used. All pathways should be well lit. The use of colour contrasts may assist partially sighted people. The pathway system should where possible be designed to avoid crossing vehicular routes within the site. Where this is not practicable, use should be made of dropped kerbs and textured surfaces so that the crossing point is suitable for both wheelchair users and people with visual impairments.

Ramps, where used, should have a gradient of approximately 1:20 (maximum 1:12). Where ramps are steep (greater than 1:20) steps should also be made available. Long ramps require a level landing at 10 m intervals. A level platform of adequate size should be provided at the entrance to the building and at the top and bottom of all ramps. Steps should have a maximum riser of 0.15m, and a minimum tread of 0.28m. Handrails should extend beyond the top and bottom of the steps or ramp and should be provided with a positive, safe end.

Street furniture should be located so that it does not obstruct pedestrian pathways. Where possible, such furniture should be at least 1m in height (0.8m minimum), with good colour contrast.

Appendix 3 Open space standards

Rugby's 2021 average household of 2.4 persons should be applied in calculating provision requirements. Contributions to children's play and youth/mini soccer will not be required from age-restricted retirement housing or for 1-bedroom homes

Existing provision table

Ref	Ward	Population 2021	Provision (ha per 1,000)	Allotments	Amenity Greenspace	Natural & Semi-Natural Space	Parks & Recreation Grounds	Provision for Children & Young People
1	Admirals and Cawston	9,847	Current provision	0.01	3.31	1.10	0.85	0.12
			Surplus/deficit	-0.64	2.04	-1.40	-0.40	-0.08
2	Benn	9,343	Current provision	0.01	0.13	0.07	0.54	0.04
			Surplus/deficit	-0.64	-1.14	-2.43	-0.71	-0.16
3	Bilton	6,550	Current provision	0.94	0.71	0.61	0.80	0.03
			Surplus/deficit	0.29	-0.56	-1.89	-0.45	-0.17
4	Clifton, Newton and Churchover	2,946	Current provision	0.61	2.01	12.03	0.79	0.15
			Surplus/deficit	-0.04	0.74	9.53	-0.46	-0.05
5	Coton and Boughton	8,108	Current provision	0.10	2.25	4.79	0.79	0.06
			Surplus/deficit	-0.55	0.98	2.29	-0.46	-0.14
6	Dunsmore	8,591	Current provision	0.45	0.63	46.15	4.67	0.13
			Surplus/deficit	-0.20	-0.64	43.65	3.42	-0.07
7	Eastlands	8,583	Current provision	0.69	0.61	1.65	1.65	0.09
			Surplus/deficit	0.04	-0.66	-0.85	0.40	-0.11
8	Hillmorton	7,748	Current provision	0.05	1.33	1.73	0.78	0.07
			Surplus/deficit	-0.60	0.06	-0.77	-0.47	-0.13

9	Leam Valley	2,445	Current provision	0.55	0.92	1.94	1.03	0.19
			Surplus/deficit	-0.10	-0.35	-0.56	-0.22	-0.01
10	New Bilton	8,166	Current provision	0.34	0.35	0.91	1.12	0.06
			Surplus/deficit	-0.31	-0.92	-1.59	-0.13	-0.14
11	Newbold and Brownsover	9,276	Current provision	0.22	2.14	7.44	0.88	0.09
			Surplus/deficit	-0.43	0.87	4.94	-0.37	-0.11
12	Paddox	7,358	Current provision	0.49	0.42	9.14	1.81	0.08
			Surplus/deficit	-0.16	-0.85	6.64	0.56	-0.12
13	Revel and Binley Woods	6,407	Current provision	0.50	0.38	25.69	32.00	0.08
			Surplus/deficit	-0.15	-0.89	23.19	30.75	-0.12
14	Rokeby and Overslade	7,700	Current provision	0.00	2.02	0.08	0.13	0.07
			Surplus/deficit	-0.65	0.75	-2.42	-1.12	-0.13
15	Wolston and the Lawfords	8,351	Current provision	0.62	0.74	21.76	1.29	0.15
			Surplus/deficit	-0.03	-0.53	19.26	0.04	-0.05
16	Wolvey and Shilton	2,938	Current provision	1.87	3.15	0.00	1.63	0.07
			Surplus/deficit	1.22	1.88	-2.50	0.38	-0.13

Off-site provision and maintenance cost table

Open space contributions calculator (for off-site provision and maintenance of both on and off-site open space) figures will be updated annually using the BCIS tender price index.

Typology	Capital cost per square metre	Maintenance cost per square metre	Maintenance period	Total cost per square metre
Allotments	7.59	0.44	10 years	8.03

Typology	Capital cost per square metre	Maintenance cost per square metre	Maintenance period	Total cost per square metre
Amenity Greenspace	3.84	0.69	10 years	4.53
Natural & Semi-Natural Space	7.34	0.73	10 years	8.07
Parks & Recreation Grounds	48.39	1.22	10 years	49.61
Provision for Children & Young People	16.23	3.73	10 years	19.96

Playing pitch cost table

Costs will be updated based on Sport England facilities costs guidance and Playing Pitch Calculator.

Typology	Capital cost per pitch	Sinking fund – annual allowance	Maintenance – annual allowance	Maintenance period	Total cost per pitch
Adult football	112,524	4,951	22,167	25 years	790,467
Youth football	95,900	4,220	19,372	25 years	685,692
Mini soccer	30,100	1,324	5,959	25 years	212,196
Rugby union	168,813	7,934	31,229	25 years	1,147,896

Typology	Capital cost per pitch	Sinking fund – annual allowance	Maintenance – annual allowance	Maintenance period	Total cost per pitch
Cricket	365,360	17,903	67,230	25 years	2,493,676
Hockey	992,250	43,659	25,800	25 years	2,728,725
3G	1,261,740	55,517	37,480	25 years	3,586,654

Glossary

Note on the calculation of percentages: Where a policy of this plan requires a percentage of housing or floorspace or site area to be used for a particular purpose and the application of that percentage results in a fraction of a whole housing unit or unit of area, the council will round the number up.

Active ground floor frontages: buildings and facades that have both doors and windows to inhabited rooms (i.e. not bathrooms, storerooms, corridors, parking areas) at regular intervals along the street to create interest and activity.

Affordable home ownership: means First Homes, shared ownership, rent to buy and other low-cost homes for sale (at a price equivalent to at least 20% below local market value).

Amenity Green Space: public open spaces whose primary purpose is to enhance the local environment and improve the well-being of local residents, employees and visitors. Amenity green spaces are not laid out or managed for a specific function, are not likely to be physically demarcated by walls or fences, and are unlikely to have identifiable entrance points. Examples include the grassed areas within Coton Park and Shakespeare Gardens.

Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification.

Country park: an area of countryside of significant size set aside for public recreation.

Designated heritage asset: A conservation area, listed building, scheduled monument, registered park and garden or registered battlefield designated under the relevant legislation.

Employment use: A use within Use Classes B2, B8, E(g)(ii) and E(g)(iii) of the Town and Country Planning (Use Classes) order 1987 (as amended). Subject to compliance of the proposed use with Policy C2 (Main town centre uses) use class E(g)(i) will also be an employment use.

First Homes: housing made available to first-time buyers (with incomes of not more than £80,000 a year before tax) to buy with at least 30% of the market value taken off the price. The price of the home after discount cannot cost more than £250,000. When sold, the property must remain as a First Home.

Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Householder development: means an application for planning permission for development of an existing dwellinghouse, or development within the curtilage of such a dwellinghouse for any purpose incidental to the enjoyment of the dwellinghouse but doesn't include an application for change of use or an application to change the number of dwellings in a building.

Housing and Economic Development Needs Assessment (HEDNA): An assessment of the future housing and economic development needs of Coventry and Warwickshire commissioned jointly by Coventry City Council and the Warwickshire districts, including Rugby Borough. The HEDNA provides information on future housing needs of different groups, the size of new homes needed and tenure splits.

Infill development: means gap site development within a street frontage and the redevelopment or replacement of a building within a street frontage (but not including the redevelopment of large sites).

Local Geological Site: Akin to Local Wildlife Sites (see below). These sites are selected by the Warwickshire Geological Conservation Group for their geological interest. They may be private land with no public access.

Local Nature Reserve: is a statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949 by a local authority. They are places with wildlife or geological features that are of special interest locally. They will have public access. They may be managed by the council, Warwickshire Wildlife Trust, The Woodland Trust, The Royal Society for the Protection of Birds or another organisation.

Local Wildlife Site: an area of land that is designated by the Warwickshire Local Wildlife Sites Panel for its nature conservation value. There may not be public access to the site, and it may be in private ownership. A map of Local Wildlife Sites can be found here: <https://maps.warwickshire.gov.uk/greeninfrastructure/>

Low carbon technology: Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Main River: larger rivers and streams shown on the Main River Map published by the Environment Agency for which the Environment Agency carries out maintenance and improvement work.

Main town centre use: retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Major development: for housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

National Planning Policy Framework (NPPF): this is the principal statement of national government planning policy for England and can be accessed online: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Nationally Described Space Standard (NDSS): standards for minimum internal space in new dwellings, published by national government.

Natural and semi-natural green space: are areas which have natural characteristics and biodiversity value but which are also open for public use and enjoyment. Examples include the Oxford Canal and Cock Robin Wood.

Parks and Recreation Grounds: provide high quality open space to be enjoyed by all sections of the community and facilitate a range of formal and informal activities. At a minimum they should contain a formal planting area, community growing area, memorial, playing pitch, outdoor sports facility or space that caters to children or young people. As opposed to amenity green space, parks and recreation grounds are likely to be physically demarcated by fences, walls or shrubs and have identifiable entrance points and paths. Examples of parks and recreation grounds include Caldecott Park and Hillmorton Recreation Ground.

Planning Practice Guidance (PPG): an online compendium of the government's planning guidance, arranged by topic. It covers both plan making and decision taking. It can be accessed here: <https://www.gov.uk/government/collections/planning-practice-guidance>

Renewable energy: includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat.

Social rent: housing rented to people on low incomes by the council or another registered provider at rents that are set through the National Rent Regime at around 50% of market rents.

Site of Special Scientific Interest: sites designated by Natural England under the Wildlife and Countryside Act 1981.


Strategic Employment Sites: are shown on the policies map. They are: Ansty Park, Prospero Ansty, Butlers Leap, Central Park, Glebe Farm Industrial Estate, Midland Trading Estate, Rugby Cement Works, Somers Road Industrial Estate, Swift Park, Swift Valley, Valley Park, Dunchurch Trading Estate, Europark, Lawford Heath Industrial Estate, Prologis Park Ryton, Symmetry Park Rugby, Shilton Industrial Estate, Paynes Lane, Stepnell Park, and Rugby Gateway.

Annex: Development site allocations

This annex provides details for the development site allocations under Policies S6 (Residential allocations) and S7 (Employment allocations). Those policies state that the development of the allocated sites shall accord with the development principles set out in this annex which should be read as if it is incorporated into the policy text. For some sites, development principles plans have been included in this annex. These plans augment the text and provide a visual illustration of the development principles.

The references in this Annex to contributions towards off-site active travel and highways schemes may not be exhaustive of the contributions that will be sought by Warwickshire County Council towards such schemes.

Residential allocations – Brandon

Site ID: 54	Site name: Oakdale Nursery, Brandon (adjoining Binley Woods)
Site area: 3.91ha	Allocation: circa 43 dwellings
Development requirements: <ul style="list-style-type: none"> • Development frontage to be provided to Rugby Road. • Consideration of views toward the south-eastern edge of the site from Rugby Road. • Provision of recreational routes through the site where these can join with existing routes beyond. • Non-vehicular access from the northern end of the site onto Rugby Road. • Potential for a crossing to Gossett Lane and PRoWs beyond. 	
	

Residential allocations – Brinklow

Site ID: 337	Site name: West Farm and Home Farm, Brinklow
Site area: 4.05ha	Allocation: circa 75 dwellings
<p>Development requirements:</p> <ul style="list-style-type: none"> • Development will, where possible, retain, restore and re-purpose historic agricultural buildings. • The design will apply the guidance of the National Farmsteads Assessment Framework and reference the Warwickshire Historic Farmsteads Characterisation Project evidence base, appropriately draw from the conservation area character appraisal, and be sensitive to the adjacent Brinklow Disused Canal Pool LWS. • The historic earthworks within the site, including ridge and furrow and canal embankment, are to be preserved. • The new homes shall be for specialist over 55 accommodation or (for the new build element) shall comprise bungalows with two or fewer bedrooms. • If bungalows are delivered on site, planning permission will be subject to a planning condition removing deemed planning permission under classes A, AA and B of Part 1 of Schedule 2 of The Town and Country Planning (General Permitted Development) Order 2015 (as amended) or of the equivalent provision of any successor to the 2015 Order that may be enacted. • No built development shall take place on the easternmost portion of the site, shown as green space on the plan above, to avoid impact of the setting of the Brinklow Castle scheduled monument. 	



- The existing Public Right of Way (PRoW) must be maintained but rerouted. The design of the development must ensure the PRoW is pleasant to use and well overlooked.
- Maintain and upgrade pedestrian access to Broad Street via Butchers Close (PRoW)
- Provide and upgrade footways alongside Rugby Road.
- Hedgerow and woodland boundaries are to be restored and reinforced.
- Developer to explore opportunities to restore and enhance local historic landscape characteristics, such as the retention and/or planting of hedgerows and native woodland/trees, or the reintroduction of orchard where appropriate.
- Contributions may be sought towards delivery of safe walking and cycling facilities as part of Route x08 (LCWIP – bridleway between Brandon and Brinklow).

Site ID: 315	Site name: Land south of Rugby Road, Brinklow
Site area: 16.94ha	Allocation: circa 250 dwellings
<p>Development requirements:</p> <ul style="list-style-type: none"> • Provide serviced self-build and custom build plots as part of the development. • Avoid development on the easternmost field (except for provision of the access from Brays Close) to preserve ridge and furrow. • Access from Brays Close with a secondary access from Heath Lane. Access provisions to be designed to minimise impacts to the historic farmsteads on Rugby Road as far as possible. • 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. • Housing design to be aligned to local precedent and appropriately draw from guidance within the conservation area character appraisal. • Developer to explore opportunities to restore and enhance local historic landscape characteristics, such as the retention and/or planting of hedgerows and native woodland/trees, or the reintroduction of orchard where appropriate. 	



- Installation of pedestrian crossing on B4455.
- Reinforce planted boundaries to the site, to north, east, and west, to screen or filter views in and out.
- Traffic mitigation measures on Heath Lane.
- Provision of and/or contribution to delivery of safe walking and cycling facilities as part of Route x08 (LCWIP – bridleway between Brandon and Brinklow).
- Children's/youth play provision.

Residential allocations – Clifton upon Dunsmore




Site ID: 129	Site name: Land north of Lilbourne Road, Clifton upon Dunsmore
Site area: 2.31ha	Allocation: circa 60 dwellings
<p>Development requirements:</p> <ul style="list-style-type: none"> • Landscape-led development that is aligned to local precedent, and housing design that draws from the conservation area character appraisal. • Retention of hedgerows which bound the site as far as possible, and additional screening to buffer the conservation area. • Pedestrian and bicycle footway to be constructed to link development site to existing network at junction of Buckwell Lane and Manor Lane. • Provision of a footway along Lilbourne Road. • Drop crossing required at proposed access and across Buckwell Lane to join to existing network. • Existing street lighting should be extended to cover site access. • Proposed access should be located away from the junction of Hillmorton Lane, Lilbourne Rd and Buckwell Lane whilst still providing the required visibility splays. • Traffic calming and speed gateway treatments to be improved and include proposed access. • Contribution towards delivery of 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. 	



Site ID: 202	Site name: Newton Road, Clifton upon Dunsmore
Site area: 3.58ha	Allocation: circa 80 dwellings
<p>Development requirements:</p> <ul style="list-style-type: none"> Existing footway along Newton Road to be extended to reach proposed access points. Pedestrian crossing required at proposed access. Existing street lighting should be extended to cover proposed site access. White lining and dragon's teeth to be improved. Speed reduction measures such as speed humps and speed limits to be extended to include proposed access. Pedestrian access should be provided to Buckwell Lane via Manor Lane. Provision of children's play. The existing Public Right of Way (PRoW) must be maintained, and the design of the development must ensure it is pleasant to use. If possible, the PRoW should be routed through public open space. The PRoW shall be well overlooked. The PRoW should be maintained on its existing line if possible. Contribution towards delivery of 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. 	



Site ID: 307	Site name: North Road, Clifton upon Dunsmore
Site area: 0.94ha	Allocation: circa 10 dwellings
Development requirements: <ul style="list-style-type: none">• Solely rear gardens along the western boundary of the site would not be supported to enable a more attractive settlement edge.• Pedestrian facilities to join onto the existing network at North Road	
	

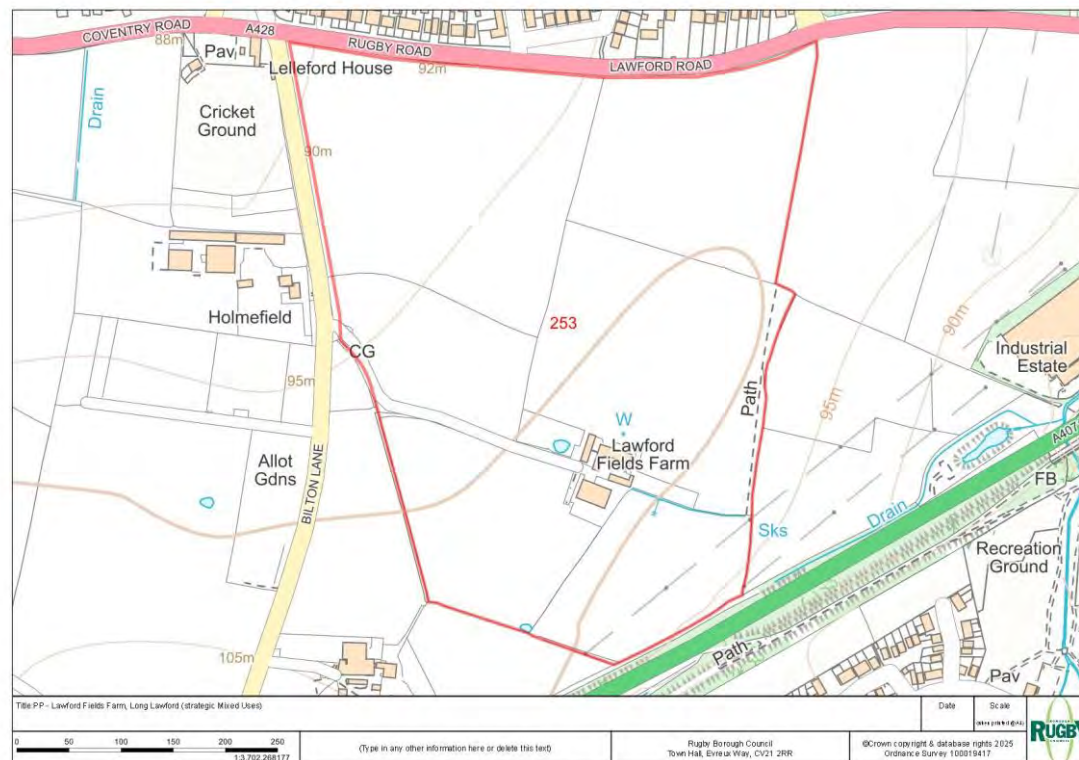
Residential allocations – Long Lawford

Site ID: 316	Site name: Land at Long Lawford
Site area: 19.75ha	Allocation: circa 400 dwellings
<p>Development requirements:</p> <ul style="list-style-type: none"> • Frontages to face Coventry Road and Lawford Health Lane. • 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). • Pedestrian crossing to be provided on Coventry Road to provide a direct connection to the north-south pedestrian route through the Bloor Homes <i>The Brambles</i> development to link to Back Lane and the village centre. • No build area above underground pipeline to be integrated into the overall site layout to produce useable and attractive public space, overlooked by surrounding built form. • Connections with off-site public rights of way to provide a link to Bilton. • Provision of links towards and contributions to the delivery of footpaths and cycle tracks along Coventry Road, including Local Cycling and Walking Infrastructure Plan (LCWIP) Route R63 (A428 Rugby Road, Long Lawford) which connects to Rugby town centre. 	




- Small-scale convenience retail to be provided on-site given the distance of the site from the existing Coop, space to also be provided for a community use facility which could include, for example, a pharmacy.
- Creation of a strong southern landscape boundary to form a long-term defensible Green Belt boundary.
- 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.
- Contributions may be required towards the A4071/Potsford Dam scheme identified in the Infrastructure Delivery Schedule and Strategic Transport Assessment which is likely to involve further widening of the circulatory of the roundabout, widening of the A4071 North entry and exit arms, widening the A4071 South exit arm, and widening the Potsford Dam Link entry arm.
- Contributions may be required towards the A4071/B4112 Newbold Road scheme identified in the Infrastructure Delivery Schedule and Strategic Transport Assessment which is likely to involve widening the circulatory on the northern/eastern section of the roundabout, alongside updating road markings to separate traffic flows on the B4112 Newbold Road approach.

Site ID: 253	Site name: Lawford Fields Farm
Site area: 21.6ha	Allocation: circa 250 dwellings
<p>Development requirements:</p> <ul style="list-style-type: none"> The Southern part of the site is not removed from the Green Belt. This part of the site shall be used for public recreational uses, for example sport pitches with a community use agreement, allotments or other public open space. The development of the site shall create a safe walking and cycling route linking the site with Cawston/Bilton to provide a safe walk to school route to Bilton School and Henry Hinde Juniors. The route should include a controlled crossing point over the A4071. Creation of a strong southern landscape boundary to the developable part of the site to form a long-term defensible Green Belt boundary. Built frontage along Rugby Road. No build area above underground pipeline to be integrated into the overall site layout to produce useable and attractive public space, overlooked by surrounding built form. Strong network of active travel routes to and from Rugby Road, with a direct and legible link through the residential development to the southern recreational area. Pedestrian crossing of Rugby Road to access bus stops. 	



- Provision of links towards and contributions to the delivery of footpaths and cycle tracks along Coventry Road, including Local Cycling and Walking Infrastructure Plan (LCWIP) Route R63 (A428 Rugby Road, Long Lawford) which connects to Rugby town centre.
- Contributions may be required towards the A4071/Potsford Dam scheme identified in the Infrastructure Delivery Schedule and Strategic Transport Assessment which is likely to involve further widening of the circulatory of the roundabout, widening of the A4071 North entry and exit arms, widening the A4071 South exit arm, and widening the Potsford Dam Link entry arm.
- Contributions may be required towards the A4071/B4112 Newbold Road scheme identified in the Infrastructure Delivery Schedule and Strategic Transport Assessment which is likely to involve widening the circulatory on the northern/eastern section of the roundabout, alongside updating road markings to separate traffic flows on the B4112 Newbold Road approach.

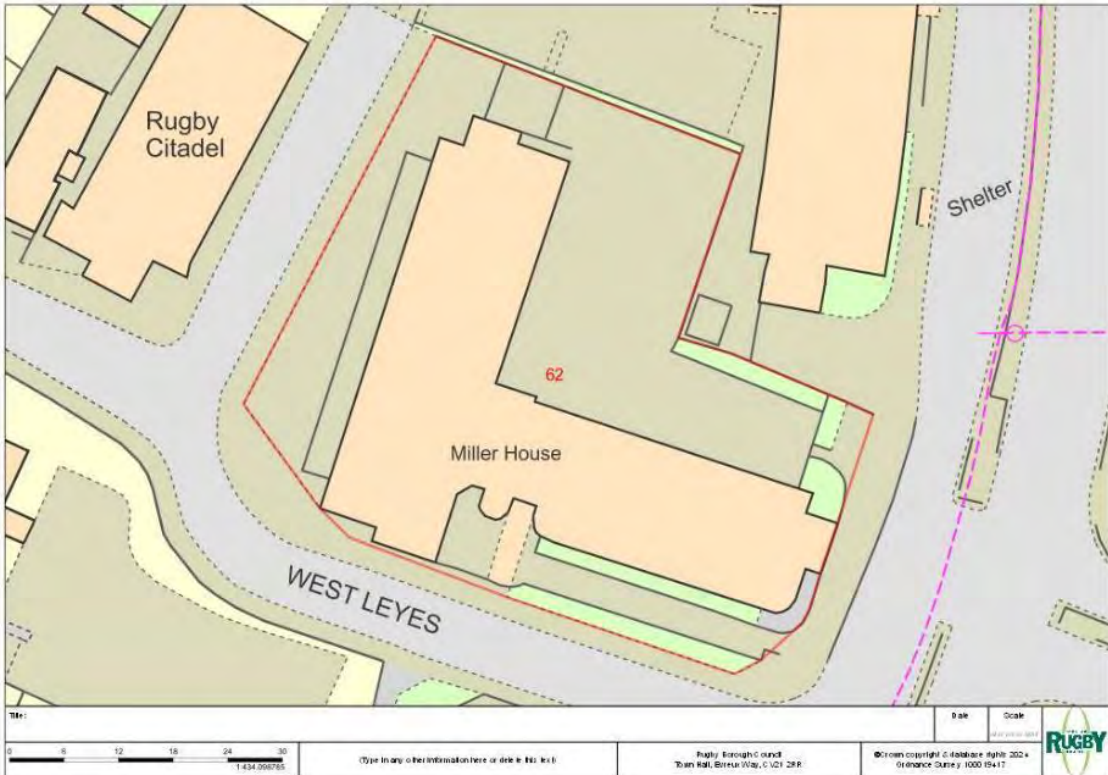
Site ID: 172	Site name: Elizabeth Way, Long Lawford
Site area: 0.09ha	Allocation: circa 5 dwellings
Development requirements: <ul style="list-style-type: none"> • Fronts and backs to be carefully considered. • Access to adjacent greenspace to be incorporated where possible. 	
	

Residential allocations – Newton

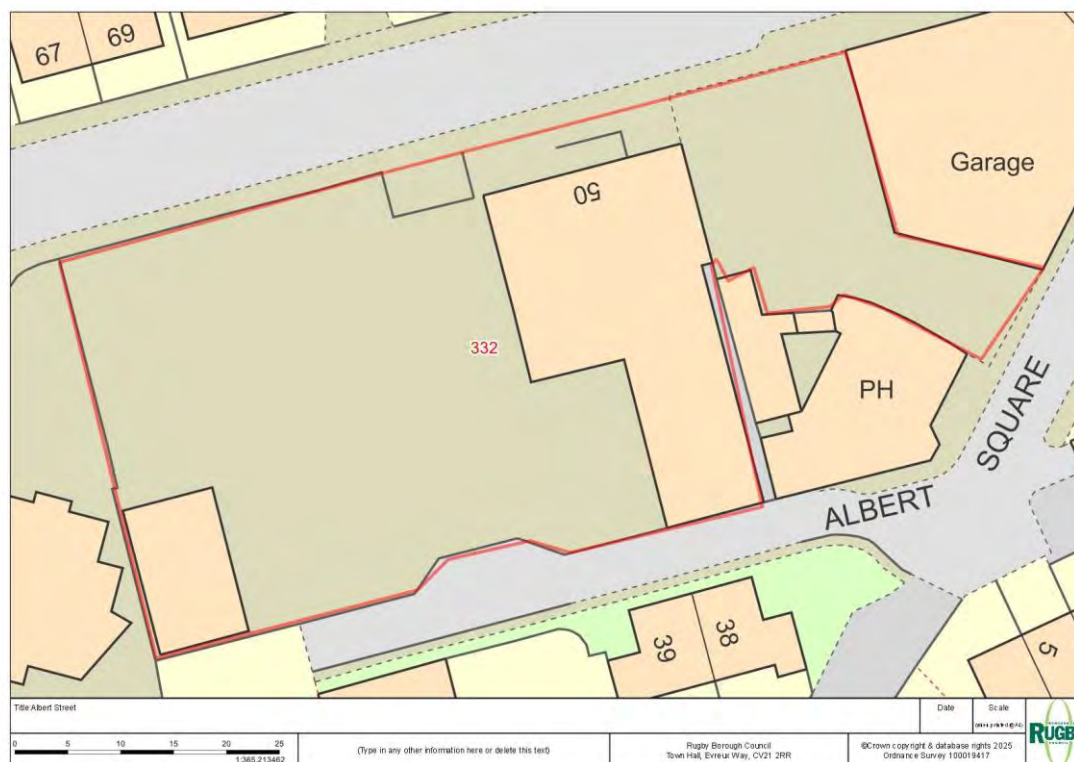
Site ID: 87	Site name: Hillcrest Farm, Newton
Site area: 1.04ha	Allocation: circa 25 dwellings
<p>Development requirements:</p> <ul style="list-style-type: none"> Dwellings to be designed to have frontage to The Hollies and Newton Lane. Vehicular access to be from Newton Lane. The existing Public Right of Way (PRoW) must be maintained, and the design of the development must ensure it is pleasant to use and well overlooked. The PRoW should be accessible to as many people as possible, including those who are disabled or less mobile. Upgrade walking and cycling links (footpath to the north and bridleway to the south) to Great Central Walk/LCWIP Route 46 (Great Central Walk between Crowthornes and Newton) which connects to schools, local amenities and employment sites in Coton Park. Suitable 2m minimum width pedestrian footway adjacent to Newton Lane to tie into any existing pedestrian provision to be provided. Crossing facilities required to access pedestrian footway on eastern side of Newton Lane. Contributions may be required towards delivery of the cycle route network improvements identified in the Local Cycling and Walking Infrastructure Plan (LCWIP), including R46 (Great Central Walk between Crowthornes and Newton). 	

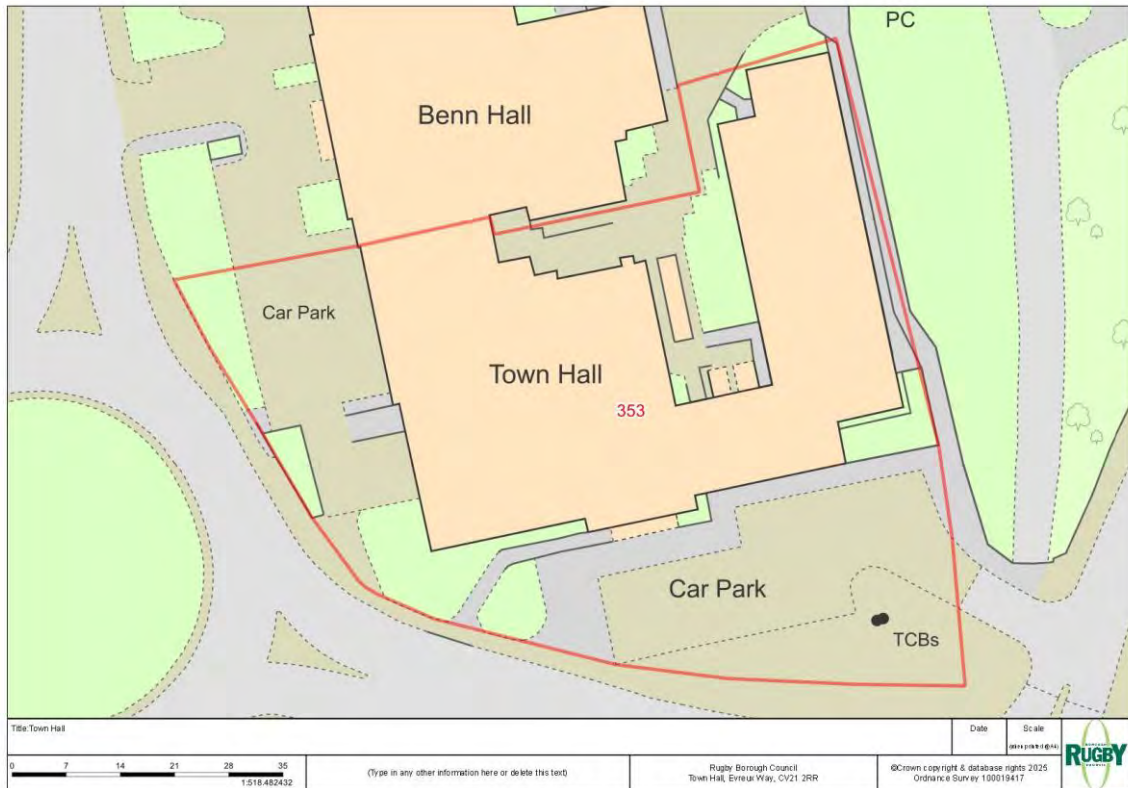


Residential allocations – Rugby

Site ID: 62	Site name: Morgan Sindall House, Rugby town centre
Site area: 0.28ha	Allocation: circa 90 dwellings
Development requirements: <ul style="list-style-type: none"> The design must balance appropriate outlook and amenity of dwellings with a positive frontage to Corporation Street. The re-use of parts of the existing building, if possible, is supported. The design must respond to the heritage context, including the nearby Conservation Area and listed buildings. If additional scale is pursued, a townscape analysis must be undertaken to determine maximum acceptable parameters, so as to avoid unacceptable townscape and heritage impacts. Contributions required towards Town Centre Active Travel Zone, and cycle route network improvements being delivered as part of the Local Cycling and Walking Infrastructure Plan (LCWIP). 	
	

Site ID: 332	Site name: Former Rugby Borough Council depot, Albert Street, Rugby
Site area: 0.28ha	Allocation: circa 25 dwellings
Development requirements: <ul style="list-style-type: none"> Built form should have multiple entrances to Albert Street to provide visual connectivity to the street. Design to appropriately reference the local townscape character. Minimal setbacks onto Albert Street. Vehicular access should be provided from Albert Square. Building heights to match surrounding area with a minimum of three stories and maximum of five stories, and have regard to nearby listed buildings. Apartments and terraced dwellings are appropriate for this site. Pedestrian connection from the site directly onto Albert Square, which would benefit accessibility to other walking routes, should be provided if possible. Contributions required towards Town Centre Active Travel Zone and cycle route network improvements being delivered as part of Local Cycling and Walking Infrastructure Plan (LCWIP). 	





Site ID: 353	Site name: Town Hall, Rugby					
Site area: 0.52ha	Allocation: circa 124 dwellings					
Development requirements: <ul style="list-style-type: none">Principal frontage to Evreux Way. Built form to positively address Newbold Road and Caldecott Park. Built form, including massing and scale, should provide a gateway presence to the town centre.Defensible space to be created between built form and the footpath on the eastern boundary, adjacent to Caldecott Park.Retention of the central portico on the Evreux Way frontage where practicable.Contributions required towards Town Centre Active Travel Zone and cycle route network improvements being delivered as part of Local Cycling and Walking Infrastructure Plan (LCWIP).						
 <p>The map shows the Town Hall site (353) in orange, surrounded by green spaces (PC, TCBs) and grey areas (Car Park). A red line outlines the site boundary. The map includes a scale bar (0 to 35m), a title 'Title: Town Hall', and a metadata table.</p> <table><tr><td colspan="2">Rugby Borough Council Town Hall, Evreux Way, CV21 2RR</td><td>© Crown copyright & database rights 2025 Ordnance Survey 100019417</td><td>Date Scale 1:518</td><td>RUGBY</td></tr></table>		Rugby Borough Council Town Hall, Evreux Way, CV21 2RR		© Crown copyright & database rights 2025 Ordnance Survey 100019417	Date Scale 1:518	RUGBY
Rugby Borough Council Town Hall, Evreux Way, CV21 2RR		© Crown copyright & database rights 2025 Ordnance Survey 100019417	Date Scale 1:518	RUGBY		

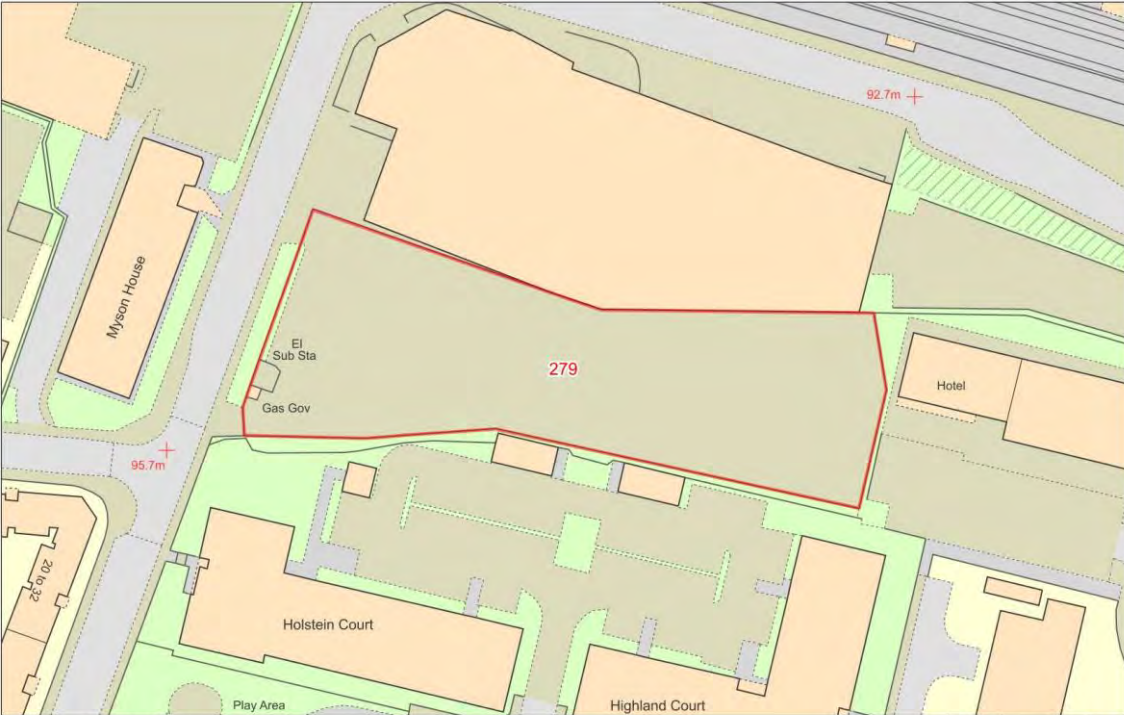
Site ID: 283	Site name: Rugby Central Shopping Centre
Site area: 2.17ha	Allocation: circa 200 dwellings
Development requirements: <ul style="list-style-type: none"> • To be designed in accordance with the forthcoming Rugby Central Development Brief SPD • Integrate with the Public Realm Masterplan • Mixed-use development with some town centre uses at ground floor level and residential above. • Improve connectivity from east (North Street) to west (Corporation Street) • Enhance connection to Market Place and with existing public realm • Strengthen North Street frontage. • Contributions required towards Town Centre Active Travel Zone and cycle route network improvements being delivered as part of Local Cycling and Walking Infrastructure Plan (LCWIP). 	

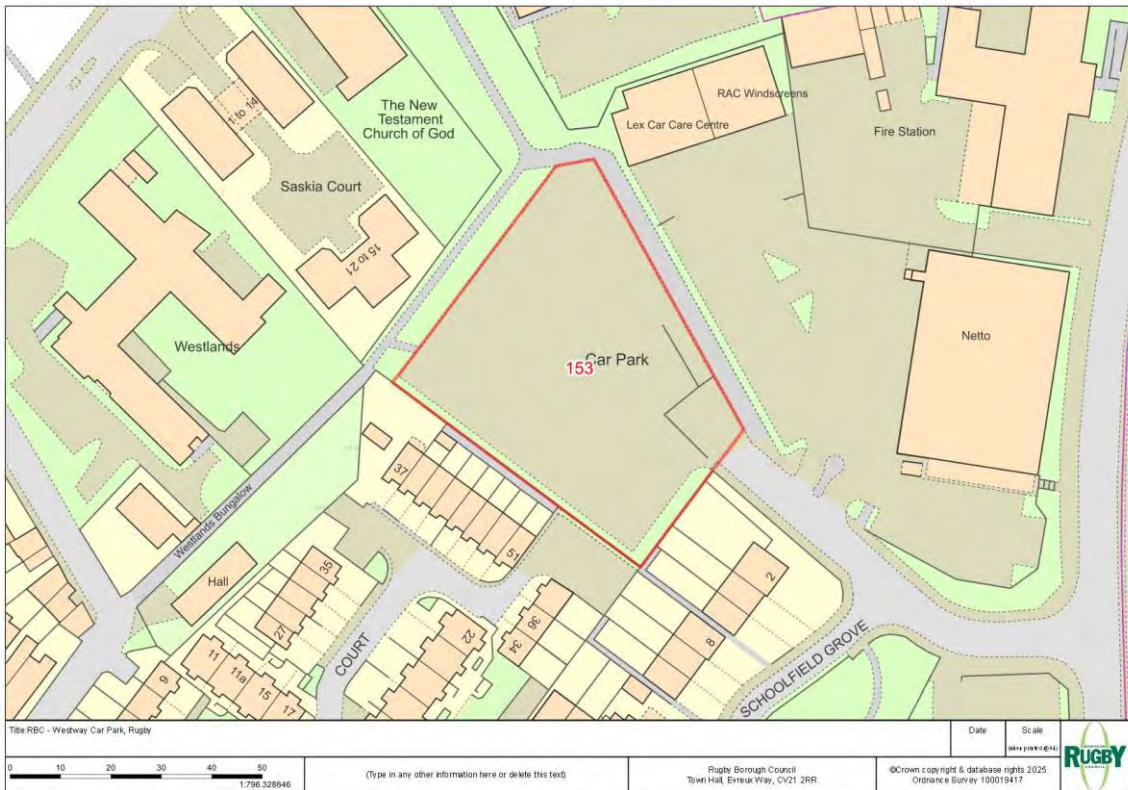
Site ID: 350	Site name: Rounds Gardens, Rugby
Site area: 2.50ha	Allocation: circa 70 dwellings
Development requirements: <ul style="list-style-type: none"> • Provide key frontages to Edward Street and Oliver Street. • Provide a north-south active travel link within a green corridor through the site to connect to the existing York Street play area and adjacent allocation site (see site 351). This link should facilitate access to the existing footpath leading south from Oliver Street. • Contribute to and facilitate the enhancement of the existing route between York Street and Hill Street to provide an active travel route. This should be landscaped, overlooked by built development and designed so that it can be used safely at all times of day. • Allow for a potential vehicular connection between this site and the adjacent allocation site (see site 351). 	

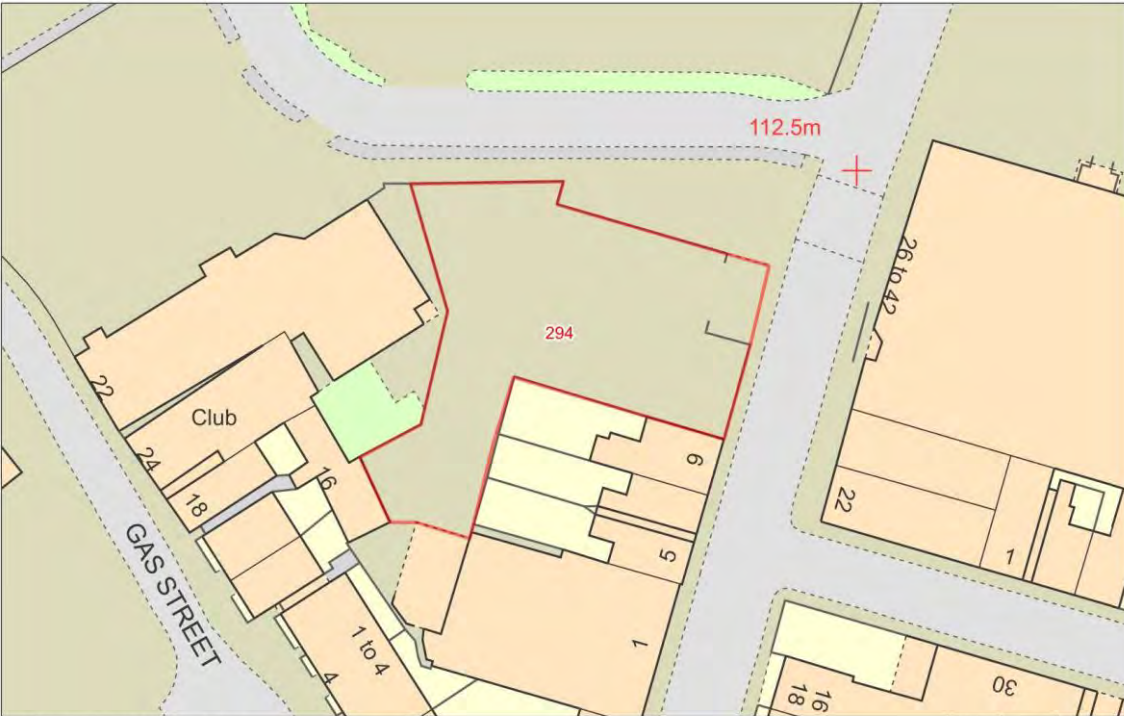



Site ID: 351	Site name: North of Rounds Gardens, Rugby
Site area: 5.10ha	Allocation: circa 60 dwellings
<p>Development requirements:</p> <ul style="list-style-type: none"> Retain groups of trees subject to Tree Preservation Orders and integrate them into the layout. Provide an active travel route(s) through to the adjacent allocation site to the south (site 350), and a link to the existing play area adjacent to York Street. Contribute to the enhancement of the existing route between York Street and Hill Street to provide an active travel route. This should be landscaped, overlooked by built development and designed so that it can be used safely at all times of day. Access from Princes Street and Willans Place, but no east-west through route for vehicles. Provide an active travel connection to Essex Street to the north-east of the site. Allow for a potential vehicular connection between this site and the adjacent allocation site (see site 350). Provide adequate mitigation for existing on-site sport provision. 	
 <p>The map illustrates the proposed development for Site 351, located north of Rounds Gardens in Rugby. The site is outlined in red and is situated between York Street to the west and Hill Street to the east. To the south is Site 350. The map shows existing streets including Essex Street, York Street, Hill Street, Princes Street, Edward Street, Willans Place, and Duns Street. A 'York Street play area' is marked near York Street. The map includes a key for allocation site (red outline), TPOs (green areas), non-vehicular connections (dashed lines), existing York Street - Hill Street footpath (blue dashed line), non-vehicular connection between Princes Street and Essex Street (blue dashed line), indicative vehicular access (purple arrows), potential vehicular connection between sites 350 and 351 (dotted purple line), development frontage (black outline), indicative public open space/landscaping (green areas), and indicative drainage (blue lines). A scale bar (0-100m) and north arrow are also present.</p>	

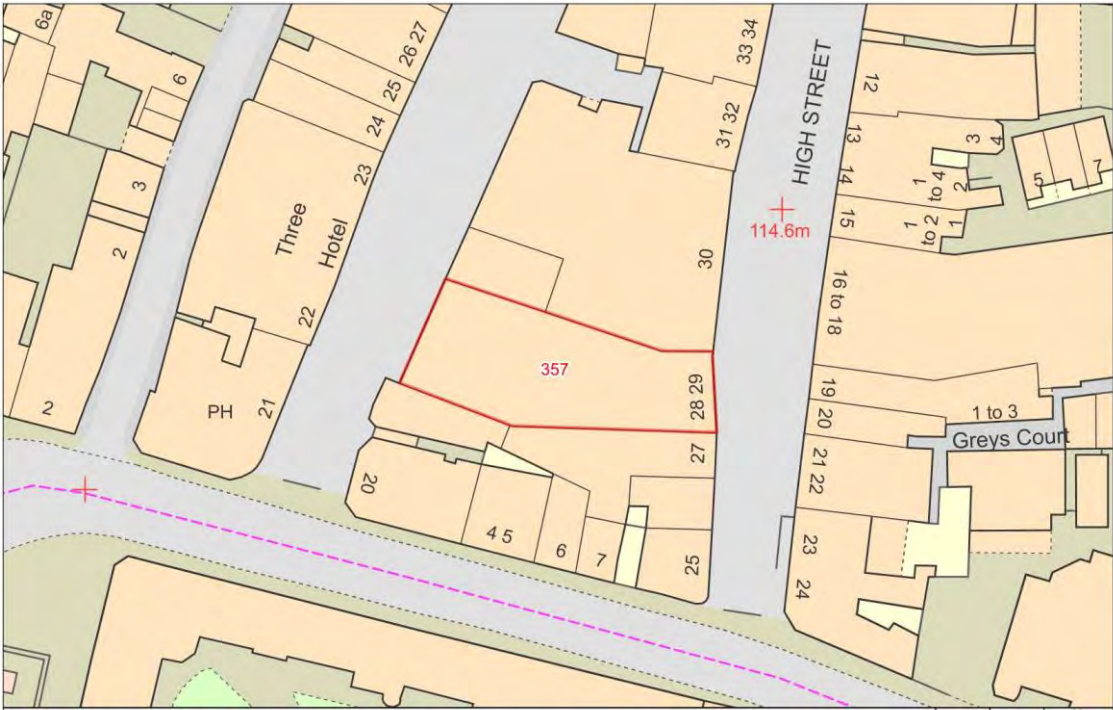
Site ID: 354	Site name: 92 Lower Hillmorton Road, Rugby
Site area: 0.36ha	Allocation: circa 34 dwellings
Development requirements: <ul style="list-style-type: none"> • Provide built frontage and access for properties to Lower Hillmorton Road in response to the existing building line and boundary treatments. • Provide pedestrian access into the wider site from Lower Hillmorton Road • Allow adequate distance between built form and the established trees along the eastern boundary of the site. • Orientate built form to Caldecott Place. • Step building heights within the Caldecott Place context to respond to the existing built form. 	
 <p>The map shows the site location at 92 Lower Hillmorton Road, Rugby. The site is outlined in red and labeled '354'. It is situated between Caldecott Place to the west and Hillmorton Road to the east. Existing buildings include a 'Club' and a 'Community Centre'. The map also shows surrounding residential areas with numbered houses. A scale bar at the bottom left indicates distances from 0 to 45 meters. The title block at the bottom right includes the Rugby Borough Council logo and contact information.</p>	

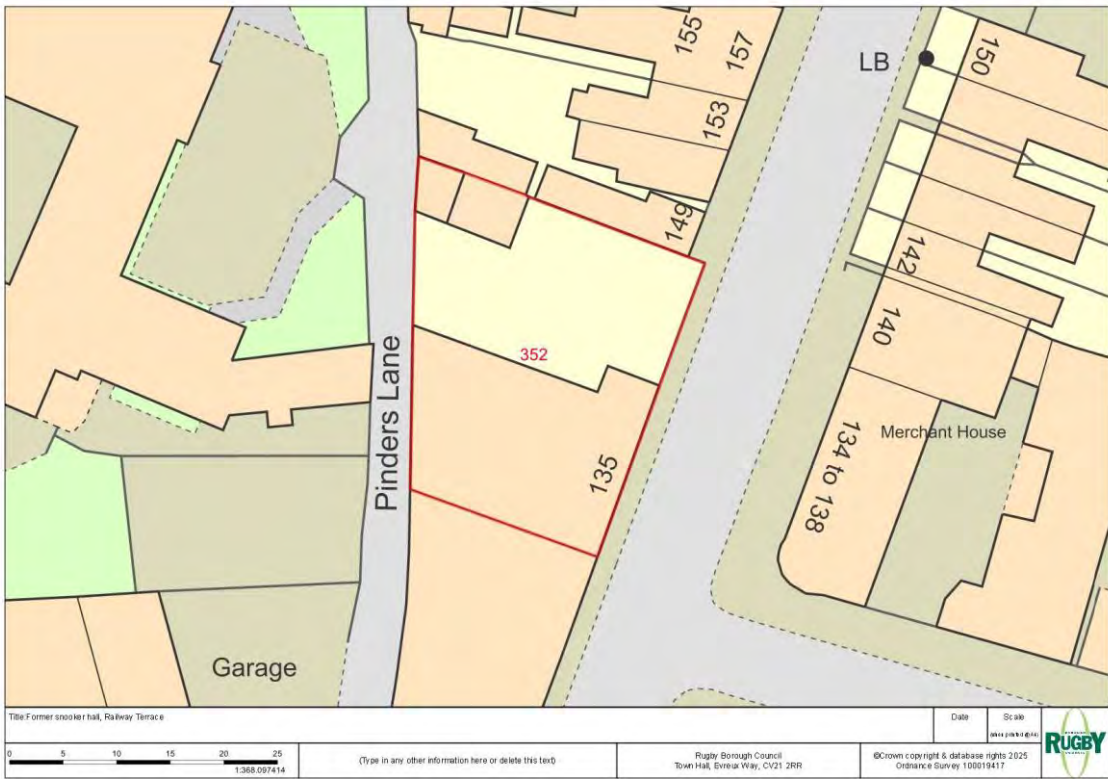
Site ID: 279	Site name: Former Stagecoach car park, Railway Terrace, Rugby
Site area: 0.41ha	Allocation: circa 32 dwellings
Development requirements: <ul style="list-style-type: none"> • Provide built frontage to Railway Terrace • Incorporate a pedestrian link to the adjacent supermarket 	
	
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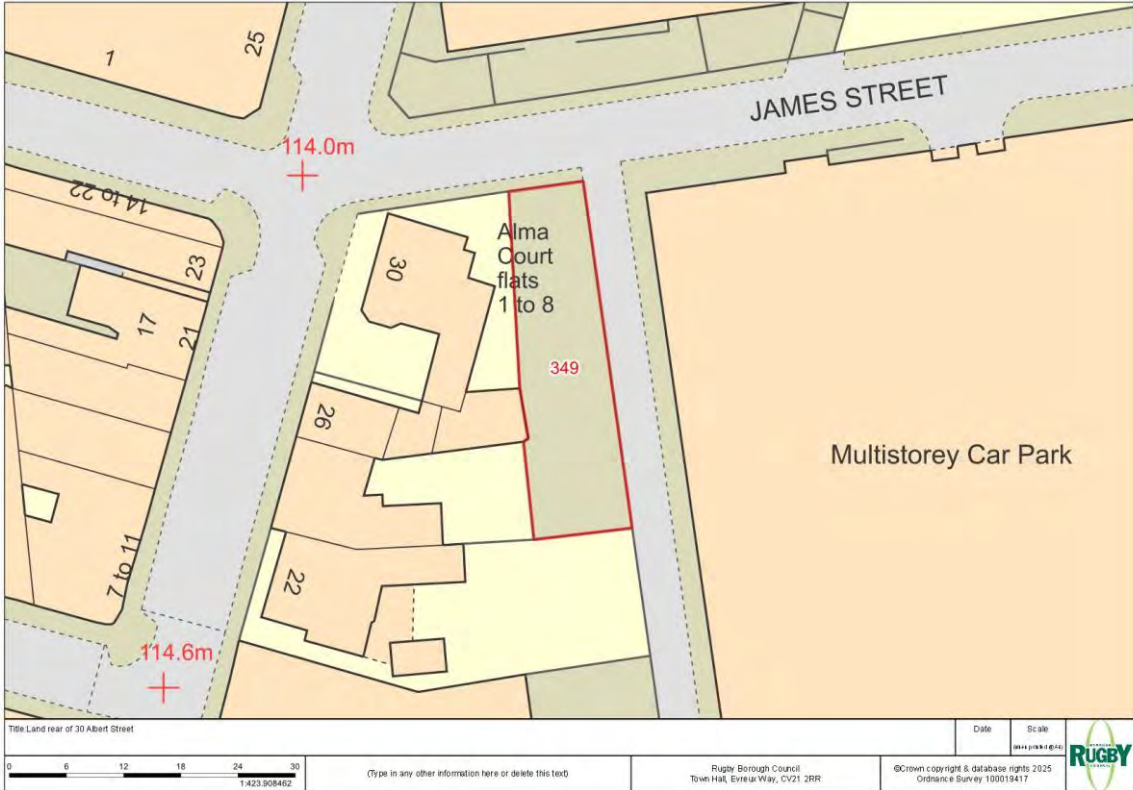
Site ID: 153	Site name: Westway Car Park, Rugby
Site area: 0.29ha	Allocation: circa 24 dwellings
Development requirements: <ul style="list-style-type: none"> Existing pedestrian routes around the north-east and north-west boundaries of the site to be overlooked by built form. Opportunities to enhance the convergence of these pedestrian routes to be explored and ensure clear pedestrian sight lines. Respond to surrounding building heights. 	
 <p>The map shows the Westway Car Park site (153) outlined in red. It is situated in an urban area of Rugby. To the north are 'The New Testament Church of God' and 'Lex Car Care Centre'. To the east is a 'Fire Station' and a 'Netto' store. To the south is 'SCHOOLFIELD GROVE'. To the west are 'Westlands' and 'Saskia Court'. A 'Hall' is located near the bottom left. The map includes a scale bar (0 to 60 meters) and a north arrow. Metadata at the bottom right includes the Rugby Borough Council logo, date, scale, and copyright information.</p>	

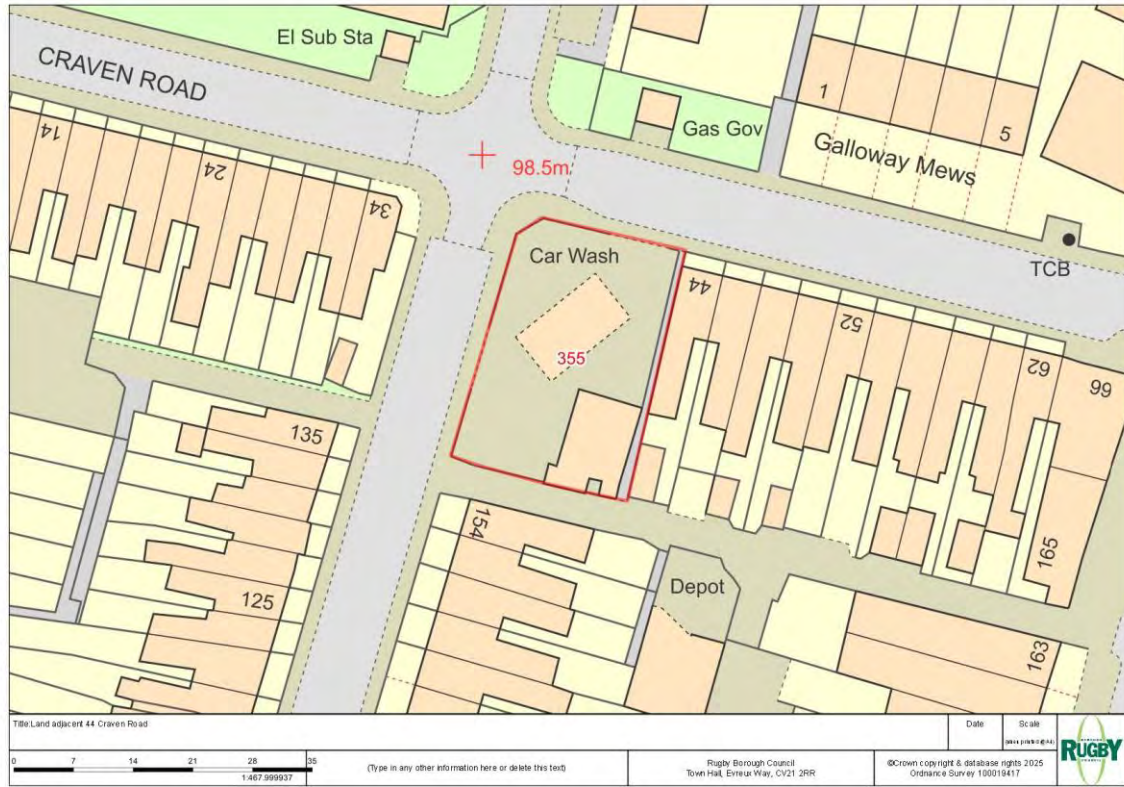
Site ID: 294	Site name: Land adjacent to 9 Railway Terrace, rugby
Site area: 0.09ha	Allocation: circa 14 dwellings
Development requirements: <ul style="list-style-type: none"> • Provide frontage to Railway Terrace • Located adjacent to the Cultural Quarter in policy C1 – refer to requirements and town centre map. 	
 <p>Title: BF Register - Land Adjacent to 9 Railway Terrace, Rugby</p> <p>Date: 14/01/2025 Scale: 1:430</p> <p>Rugby Borough Council Town Hall, Evesham Way, CV21 2RR</p> <p>© Crown copyright & database rights 2025 Ordnance Survey 100019417</p> <p>RUGBY</p>	

Site ID: 356	Site name: The Railings (NHS) off Woodside Park, Rugby
Site area: 0.24ha	Allocation: circa 10 dwellings
Development requirements: <ul style="list-style-type: none"> • Explore opportunities to link to the Black Path • Built form to adequately respond to noise from nearby uses • Habitable rooms to overlook the Black Path 	
	

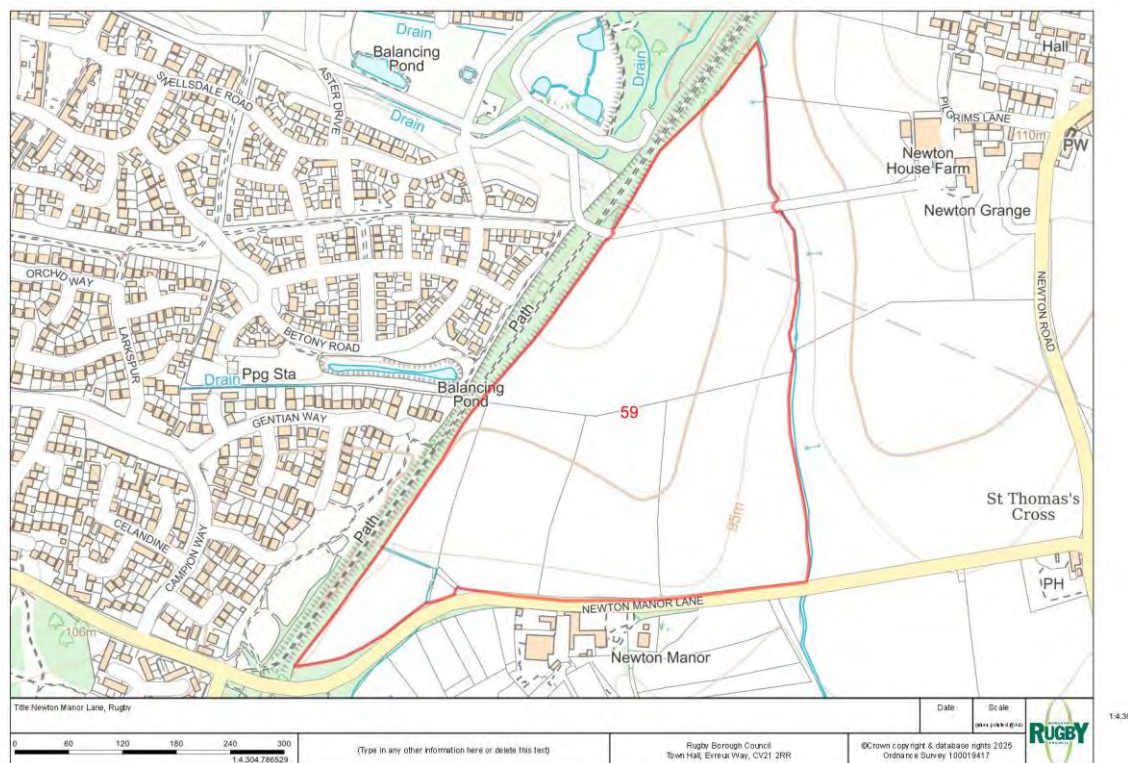
Site ID: 357	Site name: 28-29 High Street, Rugby
Site area: 0.05ha	Allocation: circa 8 dwellings
Development requirements: <ul style="list-style-type: none"> Town centre uses at ground floor level Residential on upper floors. Careful integration of residential bin storage. 	
 <p>Site 28-29 High Street</p> <p>Scale 1:507</p> <p>Rugby Borough Council Town Hall, Brecknail Way, CV21 3RR</p> <p>© Crown copyright & database rights 2025 Ordnance Survey 100019417</p>	

Site ID: 352	Site name: Former Snooker Hall, Railway Terrace, Rugby
Site area: 0.07ha	Allocation: circa 7 dwellings
<p>Development requirements:</p> <ul style="list-style-type: none"> • Dwellings to overlook both Railway Terrace and Pinders Lane. • Development frontage to Railway Terrace • Due to the size and shape of the site, particular focus on achieving positive living spaces is expected. This includes but is not limited to access to natural light, ventilation, aspect/outlook, privacy and amenity. 	
	


Site ID: 349	Site name: Land to the rear of Albert Street, Rugby
Site area: 0.03ha	Allocation: circa 5 dwellings
Development requirements: <ul style="list-style-type: none"> • Ensure development appropriately addresses the corner between James Street and Castle Mews. • Make a positive contribution to the Conservation Area. 	
	

Site ID: 355	Site name: Land adjacent to 44 Craven Road, Rugby
Site area: 0.06ha	Allocation: circa 5 dwellings
Development requirements: <ul style="list-style-type: none"> • Primary frontage to Craven Road • Careful design consideration of the corner between Craven Road and Bath Street. 	
	

Site ID: 59	Site name: Newton Manor Lane, Brownsover
Site area: 17.03ha	Allocation: circa 285 dwellings
Development requirements: <ul style="list-style-type: none"> • 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. • Creation of community orchard and allotments. • 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.

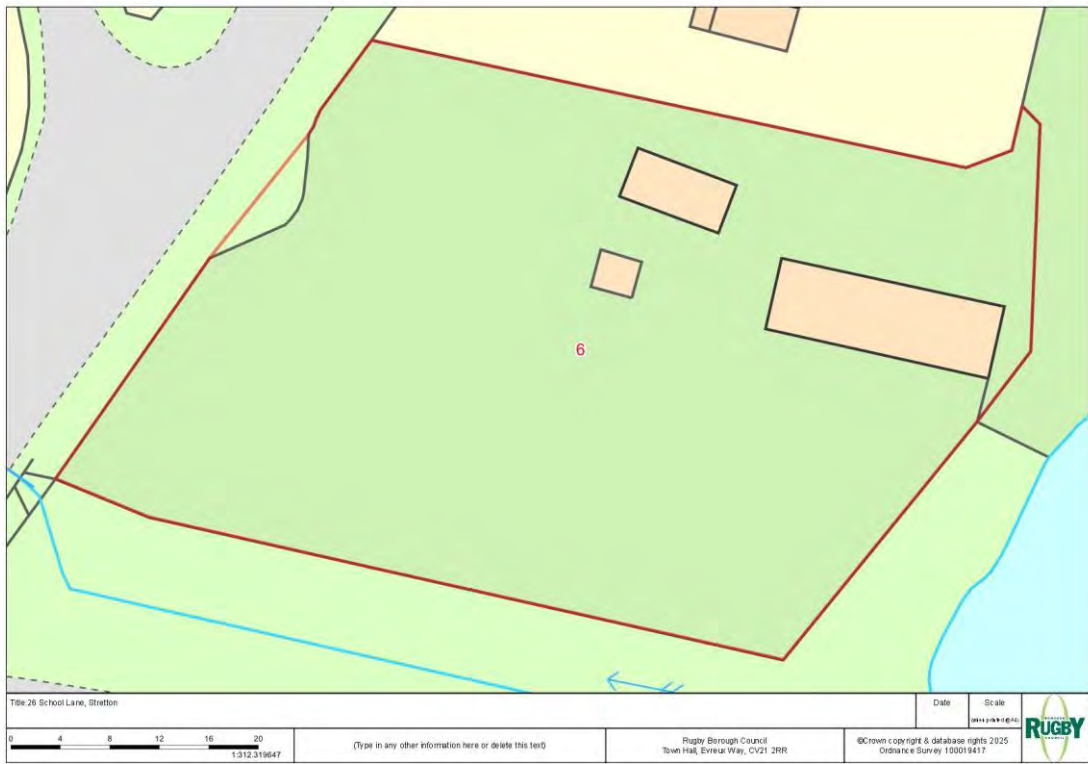
Site ID: 338	Site name: Land south of Crick Road, Houlton
Site area: 6.24ha	Allocation: circa 250 dwellings
Development requirements: <ul style="list-style-type: none"> • Creation of pedestrian access to the new Rugby Parkway station. • Improved pedestrian crossing facilities on Crick Road. • Mitigation of noise from the adjacent Eddie Stobart distribution centre and railway line. • Opportunity for higher density development, including taller buildings across the site. • Development shall front Crick Road. • Contributions may be required toward delivery of cycle route network improvements identified as part of the Local Cycling and Walking Infrastructure Plan (LCWIP), including R22 (A428 Crick Road between Houlton and DIRFT), R23 (Rugby Gateway Railway Station access), and R24 (A428 Crick Road between Paddox and Houlton). 	
	

Residential allocations – Ryton-on-Dunsmore

Site ID: 100	Site name: Land at High Street, Ryton-on-Dunsmore
Site area: 1.2ha	Allocation: circa 37 dwellings
Development requirements: <ul style="list-style-type: none"> Continuous dwelling frontages to Leamington Road and High Street. Provision of a footpath along the southern edge of the site. The existing Public Right of Way (PRoW) must be maintained, and the design of the development must ensure it is pleasant to use and well overlooked. If possible the PRoW should be routed through public open space. The PRoW is likely to need to be diverted but should maintain a direct route and be accessible to as many people as possible, including those who are disabled or less mobile. Provision of a new footway on the west side of High Street to connect with existing footway and provide a safe walking route to school. Pedestrian and cycle permeability through the site, including a link to Leamington Road. Improved crossing point on Leamington Road. Contributions may be required toward delivery of the cycle route network improvements identified in the Local Cycling and Walking Infrastructure Plan (LCWIP), including Cy04 (A423 Oxford Road between Tollbar and Ryton). 	




Residential allocations – Stretton-on-Dunsmore

Site ID: 6	Site name: Land east of Fosse Way opposite Knob Hill, Stretton-on-Dunsmore
Site area: 0.26ha	Allocation: circa 3 dwellings
Development requirements: <ul style="list-style-type: none"> • New houses to front Fosse Way. • Retention of mature trees. 	
 <p>The map shows a large green field outlined in red, labeled with a red '6'. Inside the field are three orange rectangular shapes representing buildings. The field is bordered by a red line. To the left of the field is a grey area, and to the right is a blue area representing water. A scale bar at the bottom left indicates distances from 0 to 20 meters. A north arrow is located at the bottom center. The map is titled 'Site 26 School Lane, Stretton' and includes a legend with 'RUGBY' and '1:312'.</p>	

Site ID: 81	Site name: Land west of Fosse Way, Stretton-on-Dunsmore
Site area: 3.52ha	Allocation: circa 40 dwellings
<p>Development requirements:</p> <ul style="list-style-type: none"> • Creation of a new approximately 2.3 hectare public open space on western half of site to the west of existing public right of way. • Retention of existing mature trees and hedgerow on Fosse Way except to allow for creation of access. • Development is to primarily face Fosse Way and secondarily face the public open space. • At the southern edge of the site, create a direct pedestrian and cycle access onto Brookside. • The existing Public Right of Way (PRoW) must be maintained, and the design of the development must ensure it is pleasant to use and well overlooked. The PRoW should be enhanced to be accessible to as many people as possible, including those who are disabled or less mobile. • Contributions to improved public transport provision. • Proactive archaeological investigation should be undertaken to inform the mitigation strategy. • Orientation of streets, footpaths, and/or amenity spaces to create a focal point of the grade II* listed memorial to the north (e.g. as a terminating feature in framed views). 	




- Provide new footways and pedestrian crossing point on Fosse Way between the site access and playground, and recreation ground and PRow on the east side of Fosse Way.

Site ID: 348	Site name: The Croft, School Lane, Stretton-on-Dunsmore
Site area: 3.57ha	Allocation: circa 70 dwellings
Development requirements: <ul style="list-style-type: none"> • Built frontage to School Lane • Maintain existing PRow and provide passive surveillance from built form. • Front onto development to the southwest (Land north of Squires Road). • Explore active travel connections toward the recreation ground off Plott Lane. 	
	
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Residential allocations – Wolston


Site ID: 39	Site name: Dyers Lane, Wolston
Site area: 0.92ha	Allocation: circa 15 dwellings
Development requirements: <ul style="list-style-type: none"> • New homes shall be for self-build and/or custom housebuilding. Alternatively, could be appropriate for specialist older people's housing. • The edge fronting the cemetery is to be carefully designed. • Pedestrian facilities to join onto existing footway network at Dyers Lane/School Street. 	



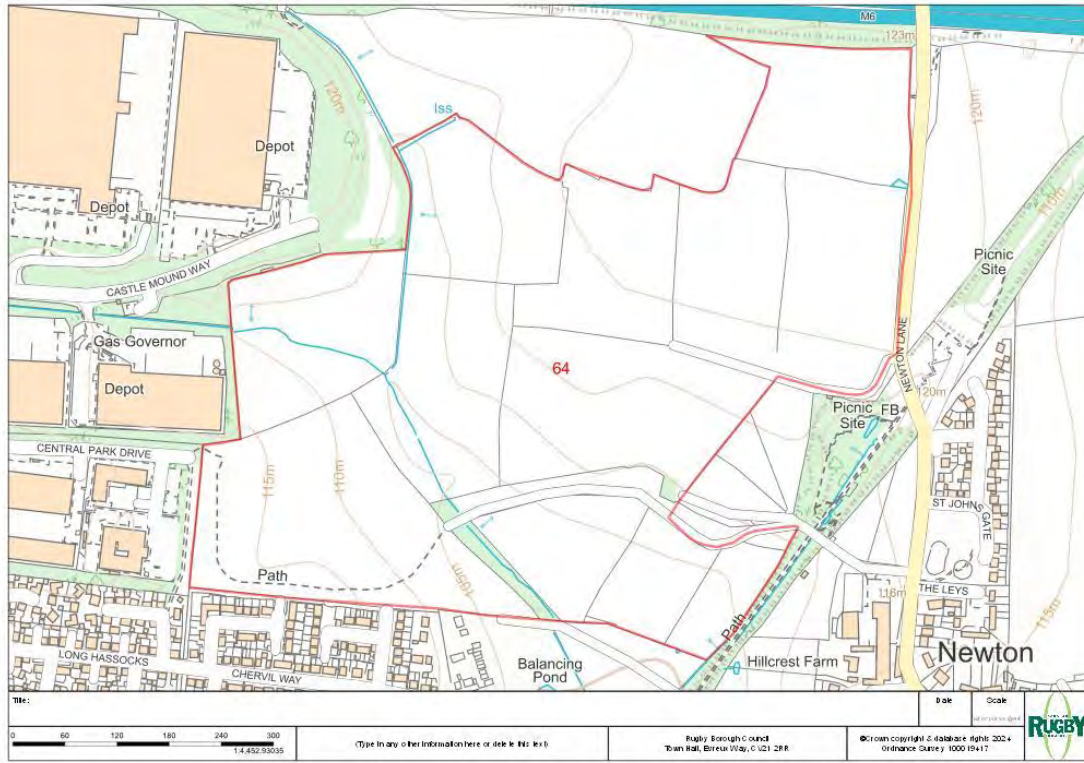
Site ID: 136	Site name: Land north of Warwick Road, Wolston
Site area: 3.87ha	Allocation: circa 80 dwellings
<p>Development requirements:</p> <ul style="list-style-type: none"> The new homes shall be for specialist over 55 accommodation or shall comprise bungalows with two or fewer bedrooms. If bungalows are delivered on site, planning permission will be subject to a planning condition removing deemed planning permission under classes A, AA and B of Part 1 of Schedule 2 of The Town and Country Planning (General Permitted Development) Order 2015 (as amended) or of the equivalent provision of any successor to the 2015 Order that may be enacted. Built frontage to Warwick Road. Explore active travel connection to Millenium Way. Pedestrian link to Wolston Lane. Long views north and west to be incorporated into the layout design. 	
	

Residential allocations – Wolvey

Site ID: 358	Site name: Land at Coventry Road, Wolvey
Site area: 2.27 ha	Allocation: circa 60 dwellings
<p>Development requirements:</p> <ul style="list-style-type: none"> • Active travel connection to Fern Hill Way. • Built frontage to Coventry Road • Built frontage to southern edge and consideration of views toward this edge from Coventry Road. • Contributions to improved public transport provision. 	
	

Site ID: 309	Site name: Land north of B4109, Wolvey
Site area: 7.1 ha	Allocation: circa 150 dwellings
Development requirements: <ul style="list-style-type: none"> • Vehicular access from the B4109. • Pedestrian and cycle access to Hall 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. • Contributions to improved public transport provision. 	
	

Employment allocations

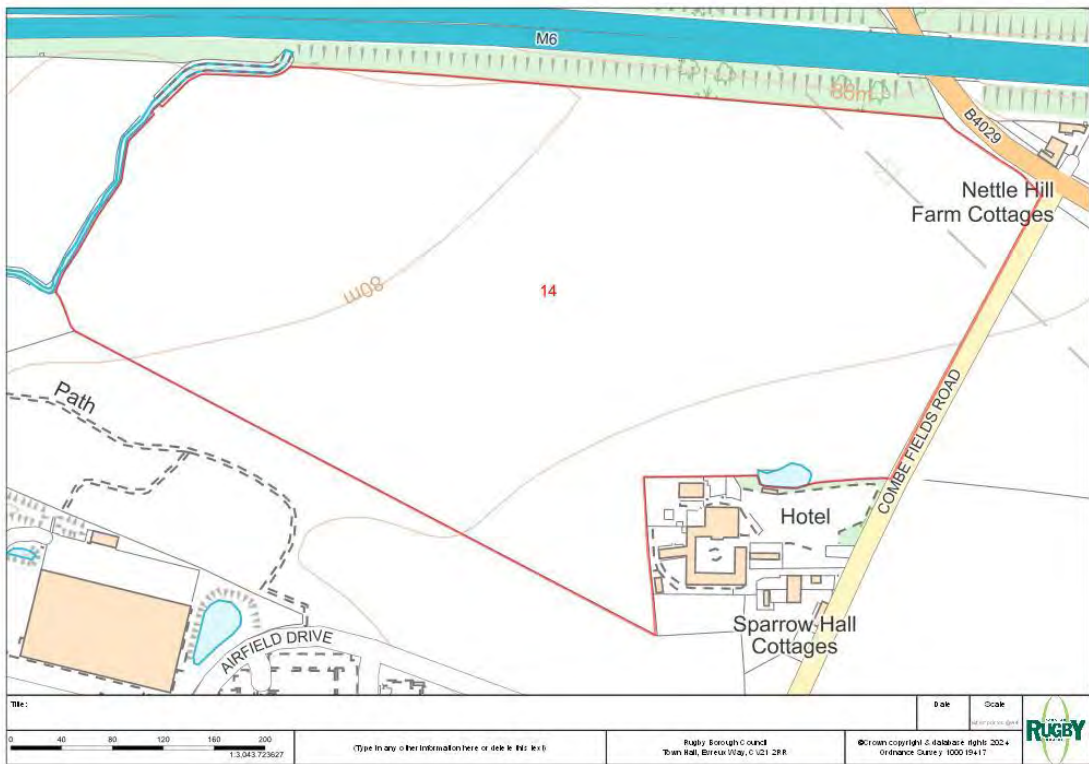
Site ID: 64	Site name: Coton Park east, Rugby
Site area: 35.97ha	Allocation: circa 115,000m ² of floorspace for employment use
<p>Development requirements:</p> <ul style="list-style-type: none"> Provision of at least 0.75ha of land immediately adjacent to Rugby Free Primary School to provide school playing fields and a forest school. Provision of 4,000m² of space in smaller units of up to 1,500m² for small and medium sized businesses. These smaller buildings should be located at the southwestern corner of the site to better relate to the scale of existing employment buildings on Castle Park Drive and to reduce impact on adjacent homes. Provision of overnight lorry parking facilities sufficient to cater for the anticipated use of the units. Pedestrian and cycle permeability through the site. Access improvements to Great Central Walk. 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. 	
	

- Contributions may be required towards delivery of the cycle route network improvements identified in the Local Cycling and Walking Infrastructure Plan (LCWIP), including R45 (footpath and underpass east of M6 J1), 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.
- Contributions may be required towards the A4071/B4112 Newbold Road scheme identified in the Infrastructure Delivery Schedule and Strategic Transport Assessment which is likely to involve widening the circulatory on the northern/eastern section of the roundabout, alongside updating road markings to separate traffic flows on the B4112 Newbold Road approach.

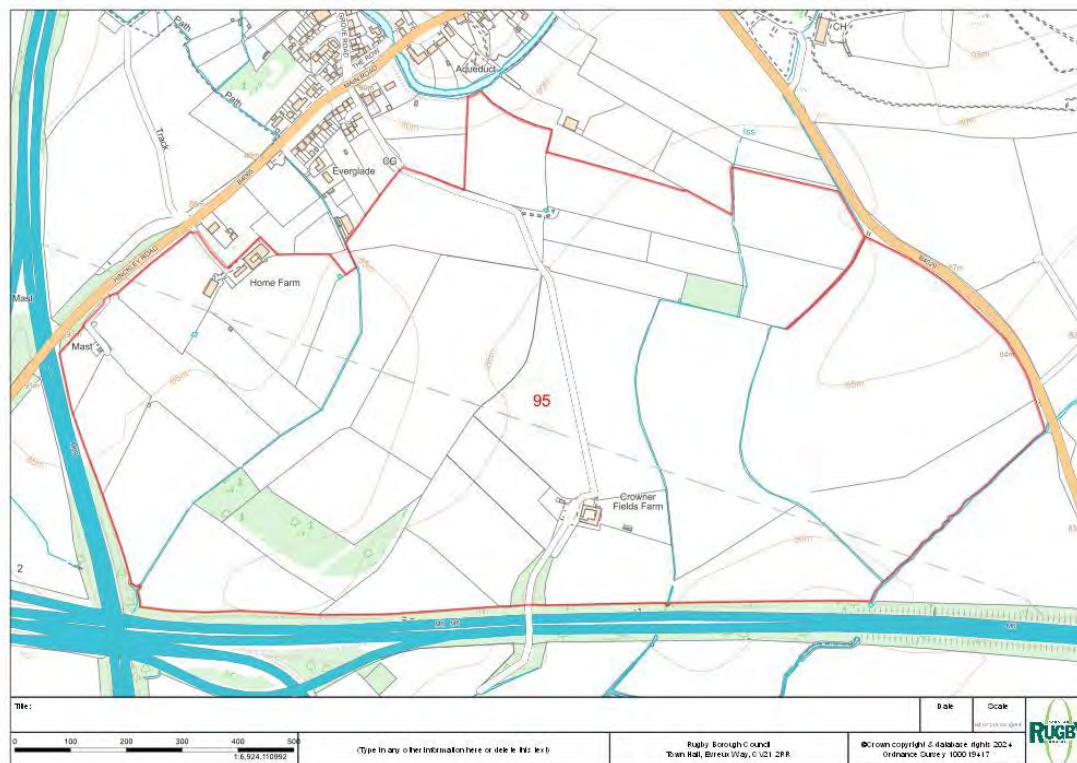
Site ID: 17	Site name: South West Rugby employment phase 2
Site area: 40.70ha	Allocation: circa 60,000m ² of floorspace for employment use
<p>Development requirements:</p> <ul style="list-style-type: none"> • Creation of a wooded circa 23ha publicly accessible country park alongside Cawston Spinney to include footpaths linking to existing routes and providing east-west connectivity along the northern site boundary. • Provision of overnight lorry parking facilities sufficient to cater for the anticipated use of the units. • Provision of tree lining to the Potsford Dam Link and Sustainable Transport Corridor. • To accord with the South West Rugby Design Code SPD. • Contributions to the strategic infrastructure costs identified in Appendix K of the South West Rugby Masterplan SPD. • 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. • Pedestrian and cycle network improvements identified in Appendix K of the South West Rugby Masterplan SPD. 	



- Contributions may be required towards the A4071/Potsford Dam scheme identified in the Infrastructure Delivery Schedule and Strategic Transport Assessment which is likely to involve further widening of the circulatory of the roundabout, widening of the A4071 North entry and exit arms, widening the A4071 South exit arm, and widening the Potsford Dam Link entry arm.
- Contributions may be required towards the A4071/B4112 Newbold Road scheme identified in the Infrastructure Delivery Schedule and Strategic Transport Assessment which is likely to involve widening the circulatory on the northern/eastern section of the roundabout, alongside updating road markings to separate traffic flows on the B4112 Newbold Road approach.

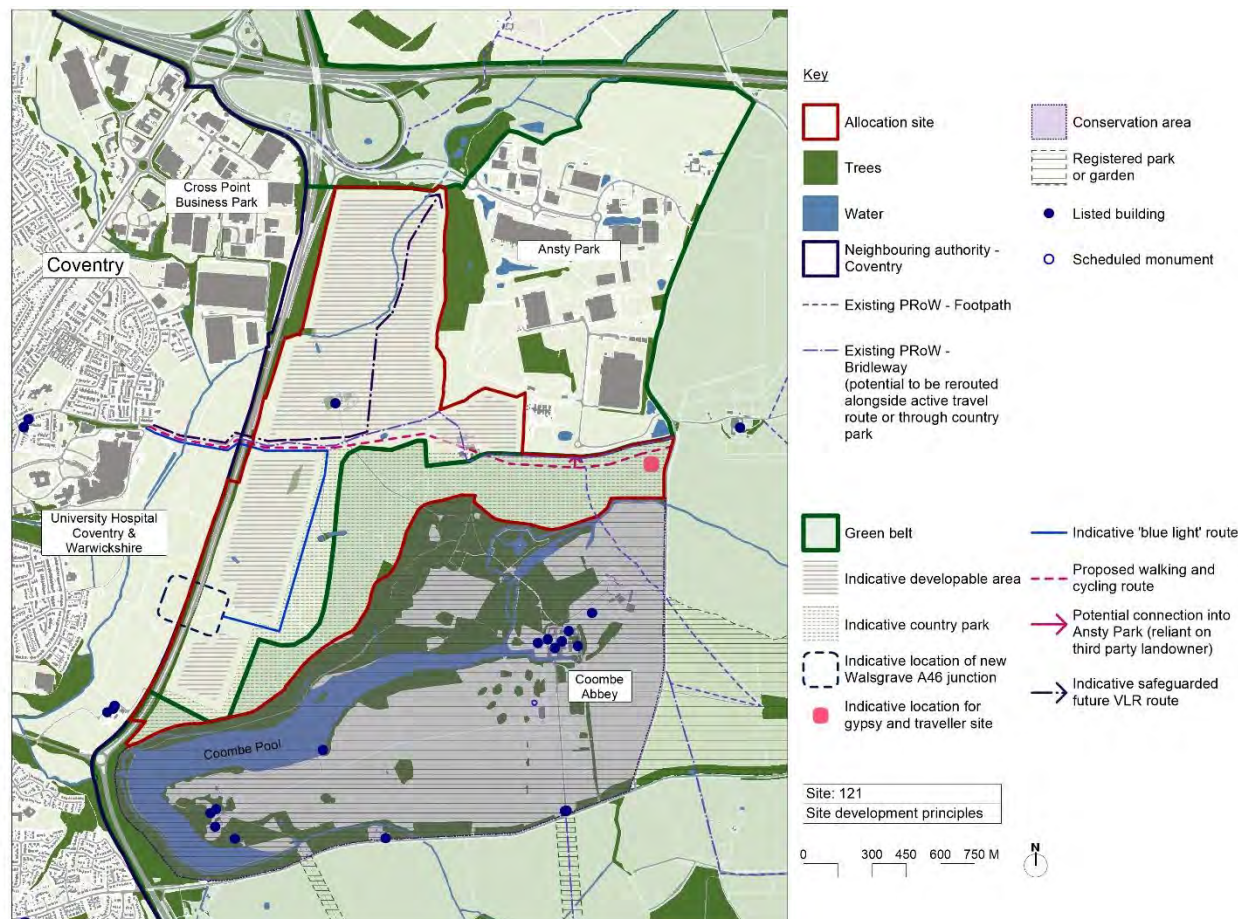
Site ID: 14	Site name: North of Ansty Park
Site area: 36.94ha	Allocation: circa 75,000m ² of floorspace for employment use
Development requirements: <ul style="list-style-type: none"> • Vehicular access through Ansty Park. • Employment floorspace to be only for uses within classes B2, E(g)(ii) and E(g)(iii) of the Town and County Planning (Use Classes) Order 1987 (as amended) with ancillary E(g)(i) uses. • Buildings to be set within a managed, high-quality landscaped environment consistent with Ansty Park. • Dedicated cycle and pedestrian links to be provided which connect with existing routes on Central Boulevard within Ansty Park and hotel and pub on Combe Fields Road. 	
	

Site ID: 95	Site name: Crowner Fields Farm and Home Farm, Hinckley Road, Ansty
Site area: 112.18ha	Allocation: circa 275,000m ² of floorspace for employment use in use classes B2, B8, E(g)(ii) or E(g)(iii) and circa 18,000m ² of use class E(g)(i) office space
<p>Development requirements:</p> <ul style="list-style-type: none"> • Other main town centre uses would need to demonstrate compliance with the sequential and impact tests in Policy C2. • Site to be developed as a cohesive campus comprising office and warehousing. • Office space to comprise a single building to be occupied in association with the wider campus operations. • Provision of a 20ha open space buffer to Ansty together with a further circa 28 ha of open space in corridors through the development. • Retention and enhancement of the 12ha Home Farm Grasslands Local Wildlife Site. • Facilitate pedestrian and cycle links to link with existing routes on Central Boulevard (Ansty Park), Coventry Canal, Ansty Village, Binley Cycleway and M6 Junction 2. • Provision of overnight lorry parking facilities sufficient to cater for the anticipated use of the units. • Facilitate the creation of a training and innovation focused hub in Rugby town centre together with funding for the delivery of training and skills at that hub. 	



- 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.
- Pedestrian and cycle permeability through the site.
- Contributions may be required toward delivery of cycle route network improvements identified as part of the Local Cycling and Walking Infrastructure Plan (LCWIP).

Site ID: 121	Site name: Land at Walsgrave Hill
Site area: 201.8ha	Allocation: circa 290,000m ² of floorspace for employment use
<p>Development requirements:</p> <ul style="list-style-type: none"> • Creation of a continuous circa 75ha publicly accessible country park adjoining Combe Abbey County Park. • Provision of 7,500m² of floorspace in small to medium size buildings (with unit sizes ranging from 60m² up to 1,500m²) to provide space for small and medium sized enterprises. • Creation of a 'blue light' route for ambulances linking the new Walsgrave A46 junction with University Hospital Coventry and Warwickshire via a bridge over the A46. • Safeguarding of a route either on-road or segregated of a future very light rail (VLR) route through the development to its northern boundary with Ansty Park, indicative alignment shown on the principles plan (right). Safeguarding to include passive provision with road diameters and the A46 bridge specification to be sufficient to accommodate later installation of VLR. 	



- Creation of a new high-quality, sealed surface walking and cycling route across the A46 bridge and through the site in line as far as the Ansty Park/Prospero Ansty boundary in line with the aspirations for route CY01 set out in the Warwickshire Local Cycling and Walking Infrastructure Plan.
- Provision of overnight lorry parking facilities sufficient to cater for the anticipated use of the units.
- 1 acre (0.4ha) of land for an 8 pitch Gypsy and Traveller site.
- There is expected to be a range of unit sizes delivered on this site. Layout, orientation and design is required to respond to the heritage assets of Coombe Abbey, the on-site heritage asset and existing and future residential development at Coventry. Site design should appropriately draw from relevant guidance and evidence in order to mitigate potential harm and reduce visual impacts.
- Maximum height parameters (varying with sensitivity) should be set across the site, and a cut and fill strategy setting built form down into the landscape to reduce the visual prominence of buildings should be considered if necessary for parts of the site.
- Historic agricultural buildings should be retained, restored and sensitively re-purposed where possible.
- Planted boundaries are to be reinforced to screen or filters views in and out of the site, particularly in relation to the registered park and garden and nearby historic farmsteads.
- A Landscape and Visual Impact Assessment shall accompany development proposals on this site.
- The existing Public Rights of Way (PRoW) must be maintained, and enhancements delivered to improve connections into the registered park and garden and the wider historic landscape. Diversions of existing PRoW should only occur where their maintenance on existing lines is not practicable, or where a diversion would demonstrably enhance the utility of the PRoW.

Appendix 2: Proposed Local Plan Submission Policies Map

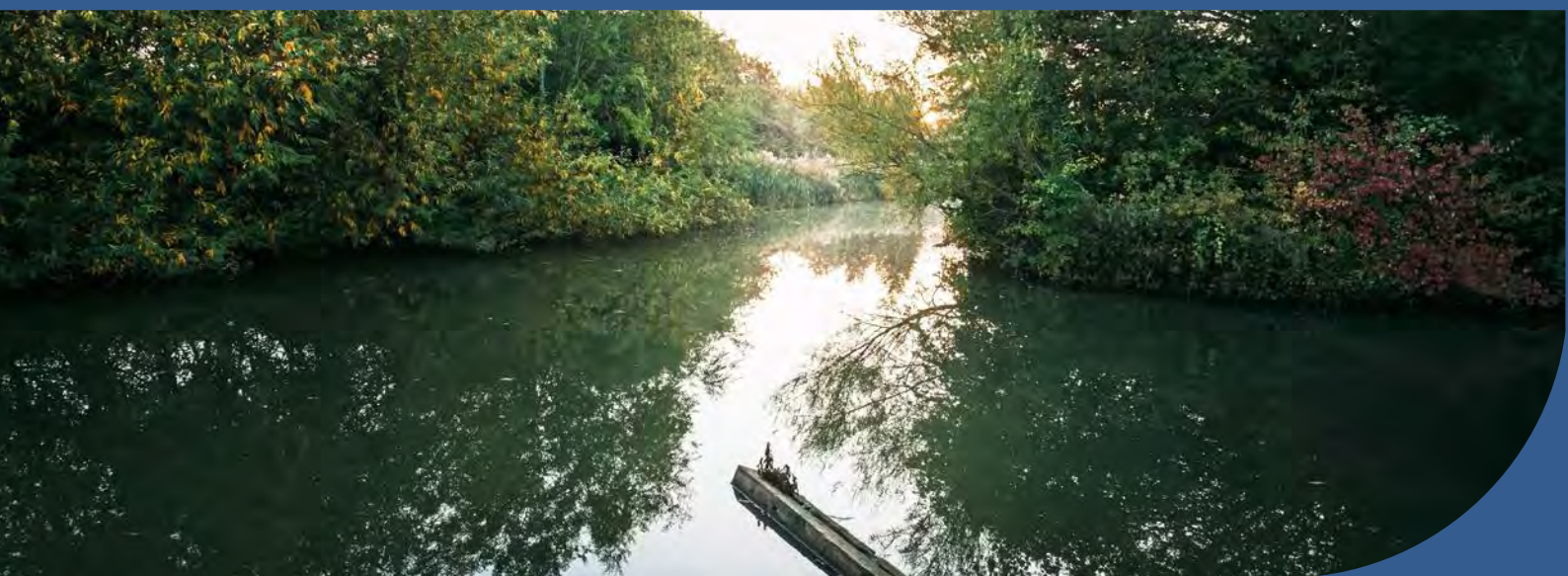
<https://shared.xmap.cloud/?map=735deead-5812-4dcd-a954-47276d50d95a>

Rugby Borough Council Local Plan

Habitats Regulations Assessment

Regulation 19

December 2025



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY



Rugby Borough Local Plan Habitats Regulations Assessment

Regulation 19 Consultation

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Front Cover: Ensor's Pool SAC (Source: Shutterstock)

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Acronyms & Abbreviations

AA	Appropriate Assessment
AIOSI	Adverse Impact on Site Integrity
ALS	Abstraction License Strategy
APIS	Air Pollution Information System
CAMS	Catchment Abstraction Management Strategy
CIEEM	Chartered Institute of Ecology and Environmental Management
DTA	David Tyldesley and Associates
EA	Environment Agency
EPs	Environmental Permits
FLL	Functionally Linked Land
GIS	Geographic Information System
HoF	Hands-off-Flow
HRA	Habitats Regulations Assessment
IAQM	Institute of Air Quality Management
IRZ	Impact Risk Zone
JNCC	Joint Nature Conservation Committee
LPA	Local Planning Authority
LSE	Likely Significant Effect
NE	Natural England
pSAC	Possible/proposed Special Area of Conservation
pSPA	Potential Special Protection Area
RBMP	River Basin Management Plan
SAC	Special Area of Conservation
SIP	Site Improvement Plan
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
STW	Severn Trent Water
SuDs	Sustainable Drainage Systems
SWMC	Surface Water Management Catchment
SWMP	Surface Water Management Plan
UK	United Kingdom
WCS	Water Cycle Study
WFA	Whole Feature Assessments
WFD	Water Framework Directive
WRMP	Water Resource Management Plan
WRZ	Water Resource Zone
WwTW	Wastewater Treatment Works
ZOI	Zone of Influence

Executive summary

- E1. Lepus Consulting was appointed, on behalf of Rugby Borough Council, to undertake a Habitats Regulations Assessment (HRA) in compliance with the Habitats Regulations 2017 (as amended)¹ of the Proposed Submission Draft Rugby Borough Local Plan (referred to hereafter as the Local Plan) at Regulation 19.
- E2. HRA is undertaken in a number of stages. The first stage of the process is Screening (Stage 1) which aims to identify whether there are any aspects of a plan which may lead to a Likely Significant Effect (LSE) at a European site, either alone or in combination with other plans or projects. Stage 2 of the process, known as the Appropriate Assessment, is undertaken where screening concludes LSEs. Where an Appropriate Assessment concludes adverse impacts on site integrity cannot be mitigated, the next stage in the process is the consideration of alternative solutions (Stage 3). Where no alternative solutions are available it is next necessary to proceed to Stage 4 of the process where consideration is given to imperative reasons of overriding public interest and securing compensatory measures.
- E3. This report provides the outputs of the HRA screening process (Stage 1), undertaken alongside preparation of the Rugby Local Plan, and the Appropriate Assessment (AA) (Stage 2).
- E4. The Local Plan is not directly connected with or necessary to the management of any European site. Consideration was therefore given to potential links or causal connections between the effects of the Local Plan and European sites to identify LSEs. This exercise was undertaken through the collation of information for each European site and application of a 'source-pathway-receptor' model.
- E5. Each component of the Proposed Submission Draft Local Plan, including policies and development allocations, was screened for LSEs. Taking no account of mitigation measures, the screening stage concluded that the Local Plan has the potential to have in-combination recreation LSEs at Ensor's Pool Special Area of Conservation (SAC) and in-combination water quality LSEs at functionally linked watercourses associated with the Severn Estuary SAC, Severn Estuary Ramsar, Humber Estuary SAC and Humber Estuary Ramsar.
- E6. It was therefore concluded that the Local Plan would be screened into the HRA process, and an AA was undertaken.
- E7. The AA focussed on evaluating whether the policies and site allocations within the Local Plan could result in adverse effects on the integrity of the screened in European sites, either alone or in combination with other plans or projects. The AA examined two key impact pathways identified through screening: water quality effects associated with development within the Local Plan upon functionally linked watercourses associated with migratory fish from the Severn Estuary SAC, Severn Estuary Ramsar, Humber Estuary

¹ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date accessed: 08/12/25].

SAC and Humber Estuary Ramsar, and an increase in recreational pressure at Ensor's Pool SAC.

- E8. Using the latest modelling outputs within the 2025 Water Cycle Study (WCS), policy safeguards in both the high-level water planning framework and Local Plan itself, alongside a review of accessibility and alternative recreational resources, the AA concluded that the Local Plan would result in no adverse impact on the integrity of the Humber Estuary SAC, Humber Estuary Ramsar, Severn Estuary SAC, Severn Estuary Ramsar, or Ensor's Pool SAC, either alone or in-combination.
- E9. Rugby Borough Council, as the Competent Authority, has responsibility to make the Integrity Test, which can be undertaken in light of the conclusions set out in this report. Rugby Borough Council must 'have regard' to Natural England's representations under the provisions of Habitats Regulations.

1 Introduction

1.1 A new Local Plan for Rugby Borough

- 1.1.1 Rugby Borough Council (the Council) is reviewing the current Local Plan, adopted in 2019 and spanning the period 2011–2031². The new Local Plan will span the period 2025–2042, and cover the administrative area of Rugby Borough, including the primary urban settlement of Rugby town, alongside nine main rural settlements, and 25 smaller rural villages. This area is hereafter referred to as the ‘Plan area’ and is illustrated in **Figure 1.1**.
- 1.1.2 Once adopted, the Local Plan will form part of the statutory development plan for the borough covering the period to 2042, replacing and updating the Local Plan 2011–2031.
- 1.1.3 A ‘call for sites’ exercise ran alongside an Issues and Options consultation between 31 October 2023 and 2 February 2024. The Issues and Options stage sought views on the key planning challenges and potential approaches to meeting future development needs³. The Council subsequently prepared the Regulation 18 Preferred Options draft⁴, which outlined its emerging strategy, preferred policy approaches and indicative site allocations and was consulted upon between 24 March and 19 May 2025. The responses to these consultations have informed the Proposed Submission Draft Plan at Regulation 19.

1.2 Habitats Regulations Assessment

- 1.2.1 The application of HRA to land use plans is a requirement of the Conservation of Habitats and Species Regulations 2017 (as amended)⁵. HRA applies to plans and projects, including all Local Development Documents in England and Wales.
- 1.2.2 Where a plan is likely to have a significant effect on a European site (either alone, or in combination) and is not directly connected with, or necessary to, the management of the European site, the Habitats Regulations notes that the plan-making authority for that plan must, before the plan is given effect, make an AA of the implications for the site in view of that site’s conservation objectives. These tests are referred to collectively as a Habitats Regulations Assessment (HRA).
- 1.2.3 The Habitats Regulations provide a definition of a European site at Regulation 8. These sites include Special Areas of Conservation (SACs), Sites of Community Importance, Special Protection Areas (SPAs) and sites proposed to the European Commission in accordance with Article 4(1) of the Habitats Directive. In addition, policy in England and Wales notes that the following sites should also be given the same level of protection as European sites⁶:

- A potential SPA (pSPA);

² Rugby Borough Council (2019) Rugby Borough Council Local Plan 2011–2031. Available at: <https://www.rugby.gov.uk/w/local-plan-2011-2031> [Date accessed: 09/12/25]

³ Rugby Borough Council (2024) Local Plan review – issues and options consultation. Available at: <https://www.rugby.gov.uk/local-plan-review> [Date accessed: 09/12/25]

⁴ Rugby Borough Council (2025) Local Plan review preferred options consultation. Available at: <https://www.rugby.gov.uk/local-plan-review-preferred-options-consultation> [Date accessed: 09/12/25]

⁵ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date accessed: 05/12/25].

⁶ Ministry of Housing, Communities and Government (December 2024) National Planning Policy Framework.

- A possible/proposed SAC (pSAC);
- Listed and proposed Ramsar Sites (wetlands of international importance); and,
- In England, sites identified or required as compensation measures for adverse effects on statutory European sites, pSPAs, pSACs and listed or proposed Ramsar sites.

1.2.4 This HRA screening report has been prepared using the following guidance:

- Planning Practice Guidance: Appropriate Assessment⁷; and,
- The Habitats Regulations Assessment Handbook – David Tyldesley and Associates (referred to hereafter as the DTA Handbook), 2013 (in particular Part F: ‘Practical Guidance for the Assessment of Plans under the Regulations’)⁸.

1.3 Previous HRA work

1.3.1 The Rugby Local Plan 2011–2031 was adopted on 4th June 2019⁹ and sets out a development strategy and planning policies. It was supported by an HRA which was undertaken iteratively throughout plan preparation¹⁰. A screening HRA report for the adopted Local Plan considered likely significant effects upon European sites within 20km of the Plan area (Ensor’s Pool SAC and River Mease SAC), focusing specifically on hydrological impact pathways. The HRA concluded that there would be no adverse impacts on the integrity of European sites either alone or in-combination and provided recommendations.

1.3.2 At Regulation 18, the Preferred Options draft of the emerging Local Plan was supported by an HRA which screened each component of the Local Plan, including policies and development allocations, for Likely Significant Effects (LSEs). Taking no account of mitigation measures, the screening stage concluded that the Local Plan has the potential to have recreational effects at Ensor’s Pool SAC and in-combination water quality effects at functionally linked watercourses associated with the Severn Estuary SAC, Severn Estuary Ramsar, Humber Estuary SAC and Humber Estuary Ramsar. It therefore concluded that the Rugby Local Plan would be screened into the HRA process for further assessment through an Appropriate Assessment (AA).

⁷ Ministry of Housing, Communities and Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment.

⁸ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (June) (2024) edition UK: DTA Publications Limited.

⁹ Rugby Borough Council. Local Plan 2011-2031 Adoption. Available at: <https://www.rugby.gov.uk/w/local-plan-2011-31-adoption> [Date accessed: 05/12/25].

¹⁰ Ecological Services (December 2018) Final Screening Report and Formal Screening Decision Habitat Regulations Assessment (HRA) for Rugby Borough Council Local Plan 2018.

1.4 Purpose of report

- 1.4.1 Lepus Consulting has been commissioned by the Council to carry out an HRA to support the preparation of the proposed submission draft of the Local Plan¹¹. The proposed submission draft is also known as the Regulation 19 version of the plan because Regulation 19 of the Local Plan Regulations 2012¹² requires that local plans are subject to particular stages of consultation.

¹¹ Rugby Borough Local Plan 2025 – 2042, Proposed Submission Draft, January 2026.

¹² The Town and Country (Local Planning) (England) Regulations 2012 Statutory Instrument 767.

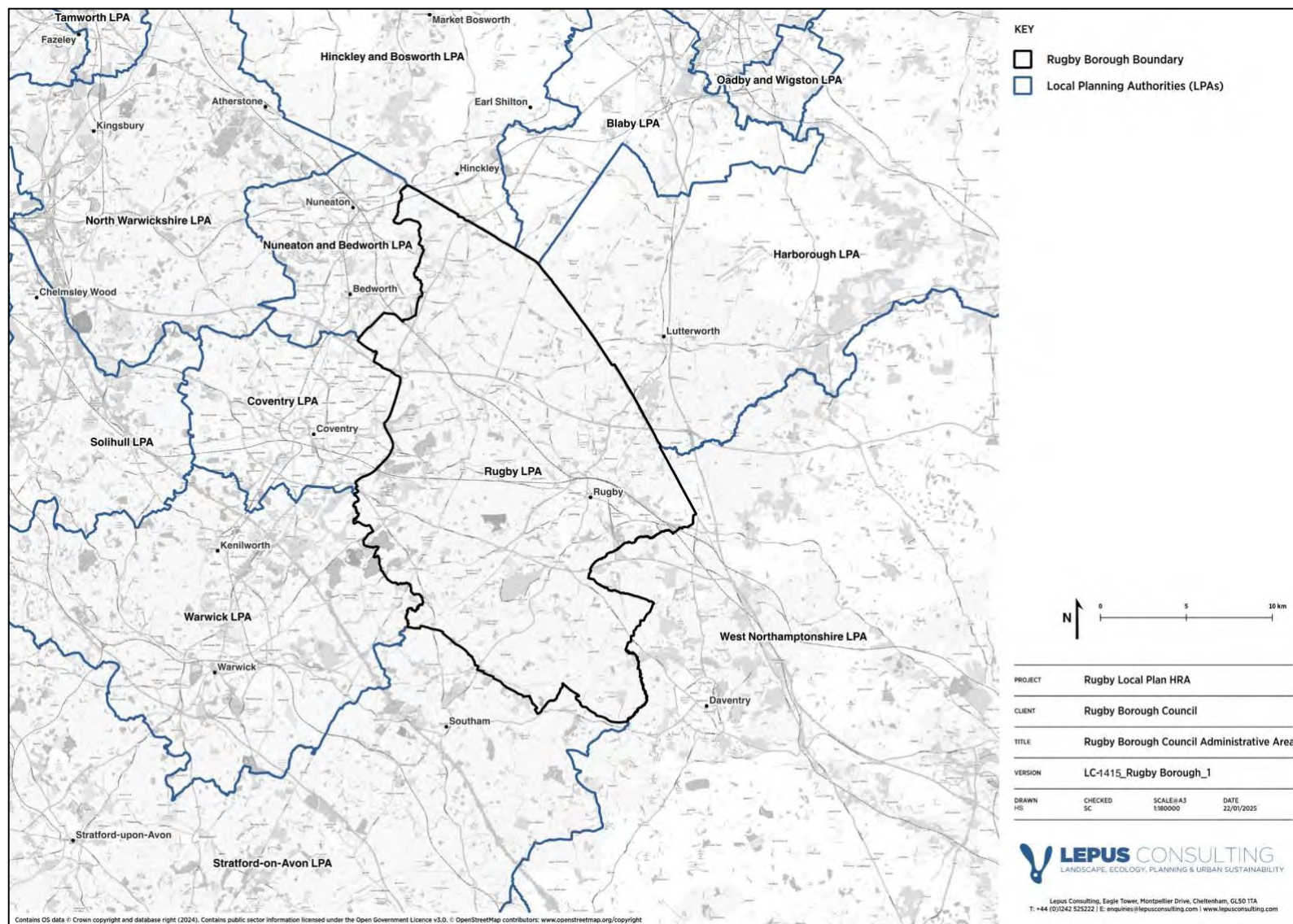


Figure 1.1: Rugby Local Plan Area

2 Methodology

2.1 Overview

2.1.1 HRA is a rigorous precautionary process centred around the conservation objectives of a European site's qualifying interests. It is intended to ensure that European sites are protected from impacts that could adversely affect their integrity. A step-by-step guide to the methodology followed for the HRA, as outlined in the DTA Handbook, is illustrated in **Figure 2.1**.

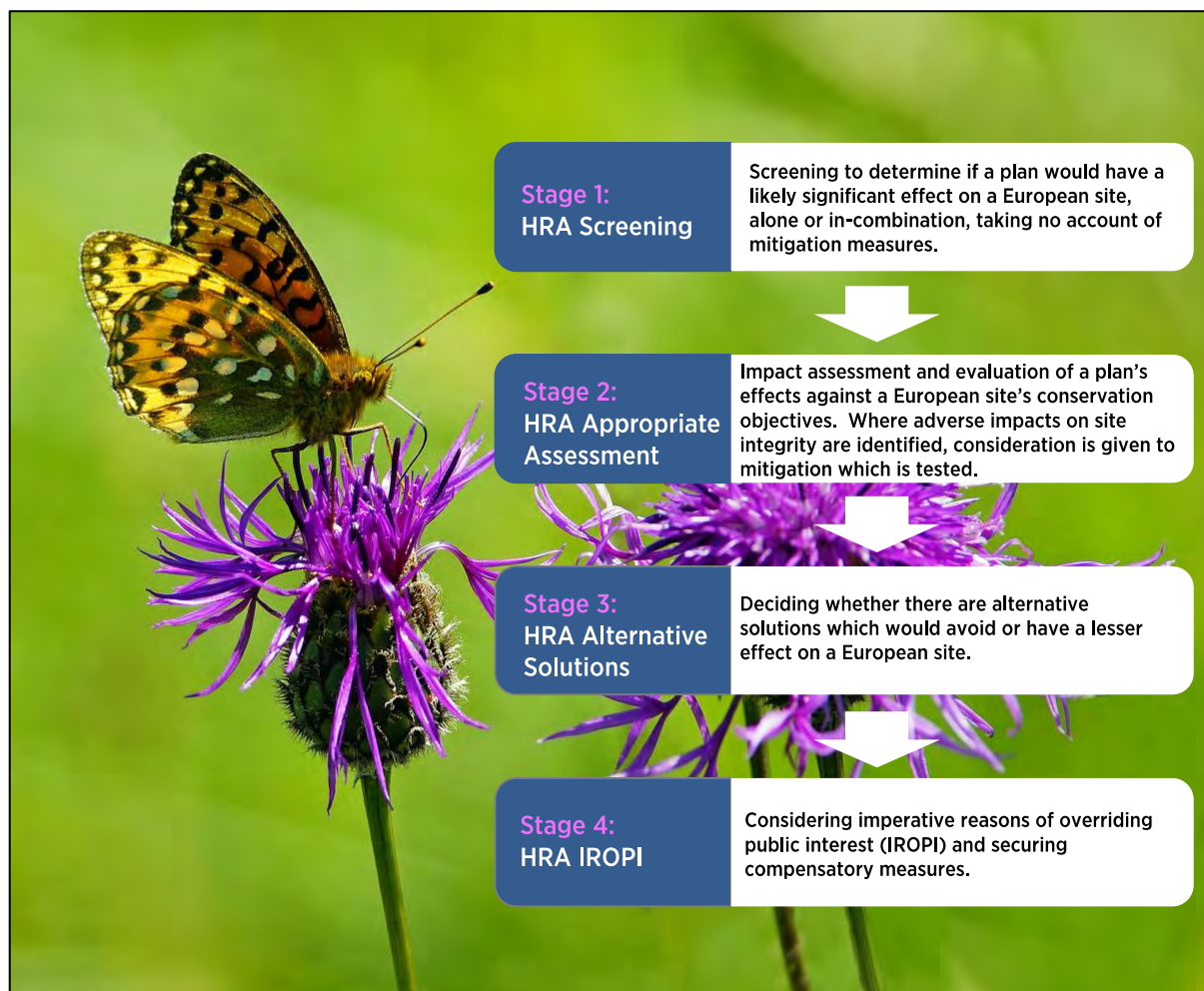


Figure 2.1: Stages in the Habitats Regulations Assessment process¹³

¹³ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (December) (2019) edition UK: DTA Publications Limited.

2.2 Stage 1: Screening for Likely Significant Effects

- 2.2.1 The first stage in the HRA process comprises the screening stage (see **Figure 2.1**). The purpose of the screening process is to firstly determine whether a plan is either (1) exempt (because it is directly connected with, or necessary to, the management of a European site); (2) able to be excluded (because it is not a plan); or, (3) able to be eliminated (because there would be no conceivable effects) from the HRA process. If none of these conditions apply, it is next necessary to identify whether there are any aspects of a local plan which may lead to an LSE at a European site, either alone, or in combination with other plans or projects.
- 2.2.2 Screening was undertaken of the Regulation 18 Preferred Options draft (see **Section 1.3**), which concluded that it had the potential to have LSEs on a number of European sites, both alone, and for a number of policies / allocations, in-combination. It therefore concluded that the Local Plan would be screened into the HRA process, and an AA would be required (Stage 2 – **Figure 2.1**).
- 2.2.3 Where elements of the Local Plan have been updated in response to the Regulation 18 consultation, these components have been re-screened to determine whether the proposed submission draft Local Plan is likely to have an LSE alone or in-combination.
- 2.2.4 Where elements of the Local Plan will not result in an LSE on a European site (alone, or in-combination), these elements are screened out and not considered in further detail in the HRA process. Where LSEs are identified, these elements of the Local Plan are screened in for further consideration in an AA. The screening process uses a number of evaluation codes to summarise whether a plan component is likely to have LSEs alone, or in-combination. These codes are set out in **Table 2.1** and are used to inform the formal screening decision (Column 2).

Table 2.1: Screening evaluation and reasoning categories from Part F of the DTA Handbook¹⁴

Screening evaluation and reasoning categories from Chapter F of the Habitats Regulations Assessment Handbook (DTA Publications, 2013):	Screen in / Screen out
A. General statements of policy / general aspirations.	Screen Out
B. Policies listing general criteria for testing the acceptability / sustainability of proposals.	Screen Out
C. Proposal referred to but not proposed by the Plan.	Screen Out
D. General plan-wide environmental protection / designated site safeguarding / threshold policies.	Screen Out
E. Policies or proposals that steer change in such a way as to protect European sites from adverse effects.	Screen Out
F. Policies or proposals that cannot lead to development or other change.	Screen Out
G. Policies or proposals that could not have any conceivable or adverse effect on a site.	Screen Out

¹⁴ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (December) (2019) edition UK: DTA Publications Limited. Available at: <http://www.dtapublications.co.uk/> [Date accessed: 05/12/25]

Screening evaluation and reasoning categories from Chapter F of the Habitats Regulations Assessment Handbook (DTA Publications, 2013):	Screen in / Screen out
H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in-combination with other aspects of this or other plans or projects).	Screen Out
I. Policies or proposals with a Likely Significant Effect on a site alone.	Screen In
J. Policies or proposals unlikely to have a significant effect alone.	Screen Out
K. Policies or proposals unlikely to have a significant effect either alone or in-combination.	Screen Out
L. Policies or proposals which might be likely to have a significant effect in-combination.	Screen In
M. Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site.	Screen In

2.2.5 The judgement by the European Court of Justice on the interpretation of the Habitats Directive in the case of People Over Wind and Sweetman vs Coillte Teoranta (Case C-323/17¹⁵) determined that mitigation measures are only permitted to be considered as part of the AA stage of the HRA process. Therefore, when assessing the LSEs of the Local Plan on European sites, the HRA screening process takes no account of incorporated mitigation or avoidance measures that are intended to avoid or reduce harmful effects on a site. These are measures which, if removed (i.e. should they no longer be required for the benefit of a European site), would still allow the lawful and practical implementation of a plan.

2.2.6 Where screening concludes there are no LSEs from the Local Plan alone, it is next necessary to consider whether the effects of the Local Plan in combination with other plans and projects would result in an LSE on any European site. It may be that the Local Plan alone will not have a significant effect but could have a residual effect that may contribute to in-combination effects on a European site.

2.2.7 Plans and projects which are considered to be most relevant to the in-combination assessment of the Local Plan include those that have similar impact pathways. These include those plans and projects that have the potential to increase development in the HRA study area (see **Appendix A**). In addition, other plans and projects with the potential to increase traffic across the study area and which may act in-combination with the Local Plan, such as the Warwickshire transport, waste and mineral plans, will also be taken into consideration. Plans which allocate water resources or are likely to influence water quality within the study area will also be considered. Finally, local plans of neighbouring authorities (listed below), which may increase development-related pressures at European sites, are considered.

- Blaby District Council
- Cherwell District Council
- Coventry City Council
- Harborough District Council
- Hinckley and Bosworth Borough Council

¹⁵ InfoCuria (2018) Case C-323/17. Available at:
<http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN>. [Date accessed: 03/12/25].

- Leicester City Council
- North Warwickshire Borough Council
- North West Leicestershire
- Nuneaton and Bedworth Borough Council
- Oadby and Wigston Borough Council
- Solihull Metropolitan Borough Council
- Stratford-on-Avon District Council
- Tamworth Borough Council
- Warwick District Council
- West Northamptonshire Council

2.2.8 The approach taken to the consideration of in-combination effects will be compliant with the Wealden Judgement¹⁶, which requires an in-combination approach that considers the development of neighbouring and nearby authorities when assessing LSEs.

2.3 Stage 2: Appropriate Assessment and Integrity Test

2.3.1 Stage 2 of the HRA process comprises the AA and Integrity Test. The purpose of the AA is to undertake an assessment of the implications of a plan for a European site in light of its conservation objectives¹⁷.

2.3.2 As part of this process, plan makers should take account of the potential consequences of no action and the uncertainties inherent in scientific evaluation; and they should consult interested parties on the possible ways of managing this risk, for instance, through the adoption of mitigation measures. Mitigation measures should aim to avoid, minimise or reduce significant effects on European sites. Mitigation measures may take the form of policies within the Local Plan, or mitigation proposed through other plans or regulatory mechanisms. All mitigation measures must be deliverable and able to mitigate the adverse effects for which they are targeted.

2.3.3 An AA presents information regarding all aspects of a local plan and ways in which it could impact a European site, either alone, or in-combination with other plans and projects. The plan-making body (as the Competent Authority) must then ascertain, based on the findings of the AA, whether the Local Plan will adversely affect the integrity of a European site, either alone, or in-combination with other plans and projects. This is referred to as the Integrity Test.

2.4 Dealing with uncertainty

2.4.1 Uncertainty is an inherent characteristic of an HRA, and decisions can be made using currently available and relevant information. This concept is reinforced in the 7th September 2004 'Waddenzee' ruling¹⁸:

¹⁶ Wealden District Council & Lewes District Council before Mr Justice Jay. Available at: <http://SLP.bailii.org/ew/cases/EWHC/Admin/2017/351.html> [Date accessed: 03/12/25].

¹⁷ MHLG and DLHC (2024) Planning Practice Guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>. [Date accessed: 03/12/25].

¹⁸ EUR-Lex (2004) Case C-127/02. Available at: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:62002CJ0127:EN:PDF>. [Date accessed: 03/12/25].

- 2.4.2 *“However, the necessary certainty cannot be construed as meaning absolute certainty since that is almost impossible to attain. Instead, it is clear from the second sentence of Article 6(3) of the Habitats Directive that the competent authorities must take a decision having assessed all the relevant information which is set out in particular in the AA. The conclusion of this assessment is, of necessity, subjective in nature. Therefore, the competent authorities can, from their point of view, be certain that there will be no adverse effects even though, from an objective point of view, there is no absolute certainty.”*

2.5 The Precautionary Principle

- 2.5.1 The HRA process is characterised by the Precautionary Principle. This is described by the European Commission: *“If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered”*. The Precautionary Principle is embedded in the Integrity Test.

3 Scoping of Threats and Pressures at European Sites

3.1 Introduction

- 3.1.1 An important initial stage of the screening process is gathering information on European sites which may be affected by the Local Plan. This is informally known as scoping, and provides an understanding of potential impact pathways from the Local Plan and connections to European sites and their vulnerabilities.

3.2 Identification of an HRA study area

- 3.2.1 Each European site has its own intrinsic qualities, besides the habitats or species for which it has been designated, that enables the site to support its particular ecosystems. An important aspect of this is that the ecological integrity of each site can be vulnerable to change from natural and human induced activities in the surrounding environment (known as pressures and threats). For example, sites can be affected by land use plans in a number of different ways, including the direct land take of new development, the type of use the land will be put to (for example, an extractive or noise-emitting use), or the pressure / threat a development generates (air pollution, water pollution or increased recreational pressure), and the resources used (for example water abstraction).
- 3.2.2 An intrinsic quality of any European site is its functionality at the landscape-ecology scale; this refers to how the site interacts with its immediate surroundings as well as the wider area. This is particularly the case where there is potential for development resulting from a plan to generate water or airborne pollutants, use water resources or otherwise affect water levels. Adverse effects may also occur via impacts to mobile species occurring outside a designated site boundary, but which are qualifying features of the site. For example, there may be effects on protected birds, bats and fish which use land outside a designated site for foraging, feeding, spawning, roosting, breeding or other activities.
- 3.2.3 There is no guidance that defines the study area for inclusion in an HRA. Planning Practice Guidance for AA indicates that: *“The scope and content of an appropriate assessment will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant site. ‘Appropriate’ is not a technical term. It indicates that an assessment needs to be proportionate and sufficient to support the task of the competent authority in determining whether the plan or project will adversely affect the integrity of the site”*¹⁹.

3.3 Scoping impact pathways

- 3.3.1 Threats and pressures to which European sites are vulnerable have been identified through reference to data held by the Joint Nature Conservation Committee (JNCC) and Natural England and through reference to Ramsar Information Sheets and Site Improvement Plans (SIPs). This information provides current and predicted issues at each European site and is summarised in **Appendix B**.

¹⁹ Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance: Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment. Available at: <https://www.gov.uk/guidance/appropriate-assessment> [Date accessed: 09/12/25]

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- 3.3.2 Supplementary advice notices prepared by Natural England often provide more recent information on threats and pressures upon European sites than SIPs and have therefore also been reviewed. A number of threats and pressures are unlikely to be exacerbated by the Local Plan and have not been considered.
- 3.3.3 Sites of Special Scientific Interest (SSSIs) are protected areas in the United Kingdom (UK) designated for conservation. SSSIs are the building blocks of site-based nature conservation in the UK. A SSSI will be designated based on the characteristics of its fauna, flora, geology and/or geomorphology. Whilst typically analogous in ecological function, the reasons for SSSI designation can be entirely different to those for which the same area is designated as a SAC, SPA or Ramsar.
- 3.3.4 Natural England conduct Whole Feature Assessments (WFA) which measure the condition of a notified feature across the whole of the SSSI. Alongside this overall condition, Natural England continues to have the ability to assign a different condition to a SSSI unit if needed where a feature is found. This baseline is calculated by following the least favourite business rule, where the overall feature condition is assigned that of the least favourable unit present.
- 3.3.5 The conservation status of each notified feature highlights any areas which are particularly vulnerable to threats/pressures. Conservation status is defined as follows:
- Favourable;
 - Unfavourable – recovering;
 - Unfavourable – no change; or
 - Unfavourable – declining.
- 3.3.6 Notified features classified as in an ‘Unfavourable – no change’ or ‘Unfavourable – declining’ condition may indicate that the SAC is in sub-optimal or poor ecological condition. It is important to remember that the SSSI may be in an unfavourable state due to the condition of features unrelated to its European designation. However, it is considered that the conservation status of SSSI features that overlap with European designated sites offer a useful indicator of habitat health at that location.
- 3.3.7 The overall objective of the Habitats Regulations is to maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of importance. Meeting site conservation objectives will ensure that the integrity of the National Site Network is maintained or restored as appropriate and ensures that each site contributes to achieving the ‘favourable’ conservation status of its qualifying features.

3.3.8 Natural England defines zones around each SSSI which may be at risk from specific types of development; these are known as Impact Risk Zones (IRZ). These IRZs are “a *GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of European sites, which are underpinned by the SSSI designation and “Compensation Sites”, which have been secured as compensation for impacts on Natura 2000/Ramsar sites*”²⁰. The location of IRZs has been taken into consideration in this assessment as they provide a useful guide as to the location of functionally linked land and likely vulnerabilities to development proposed within the Local Plan.

3.3.9 Based on previous HRA work undertaken to support the adopted Local Plan (see **Section 1.3**), the following potential impact pathways are considered to be within the scope of influence of the emerging Local Plan. Land use planning also has the potential to result in impacts upon qualifying features when located outside a designation boundary, known as functionally linked land (FLL)²¹. This HRA therefore also considers effects upon FLL or mobile species within the following topic assessments.

- **Air pollution:** Land use planning has the potential to increase atmospheric emissions of pollutants to the air. These can result in adverse effects at European sites such as eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)²².
- **Water resources and water levels:** Urban development can change run off rates from urbanised areas to European sites or watercourses which run through them. An increase in housing provision can also influence supply and demand for water within the region which may impact water levels.
- **Water quality:** Surface water run-off from urban areas has the potential to reduce the quality of water entering a catchment. Water quality may also be reduced through point source effluent discharges from new development at Wastewater Treatment Works (WwTWs) and other controlled discharge sources. Changes in water quality also have the potential to affect FLL (land or watercourses outside a designated site boundary).
- **Recreational pressure:** New housing development has the potential to increase recreational pressure upon European sites which are accessible to the public.
- **Urbanisation effects:** Urban development has the potential to result in disturbing activities (such as noise, lighting, cat predation and visual disturbance). Disturbance effects may impact upon European sites themselves

²⁰ Natural England (2019) Natural England's Impact Risk Zones for Sites of Special Scientific Interest User Guidance. Available at: https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf [Date accessed: 03/12/25].

²¹ “The term ‘functional linkage’ refers to the role or ‘function’ that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore ‘linked’ to the European site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status”. Source: Natural England (2016) Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions.

²² APIS (2016) Ecosystem Services and air pollution impacts.

and also their qualifying features when outside a designated site boundary. The Local Plan will trigger development in the form of housing, employment and retail development.

- 3.3.10 European sites assessed in this HRA report are identified in **Table 3.1** and illustrated in **Figures 3.1** and **3.2**. European sites have been included taking into consideration a review of impact pathways (for instance hydrological connectivity), a 20km buffer from the Plan area, and previous HRA work undertaken in support of the adopted Local Plan 2011-2031.

Table 3.1: *European sites for consideration in the HRA*

European site	Location in relation to the Local Plan administrative area
Ensor's Pool SAC	Located outside administrative area, approx. 4km to the west.
River Mease SAC	Located outside administrative area; approx. 18km to the north west.
Humber Estuary SAC	Located outside administrative area, approx. 125.7km to the north east.
Humber Estuary Ramsar	Located outside administrative area, approx. 125.7km to the north east.
Humber Estuary SPA	Located outside administrative area, approx. 133.4km to the north east
Severn Estuary Ramsar	Located outside administrative area, approx. 88.5km to the south west
Severn Estuary SAC	Located outside administrative area, approx. 88.5km to the south west
Severn Estuary SPA	Located outside administrative area, approx. 88.5km to the south west

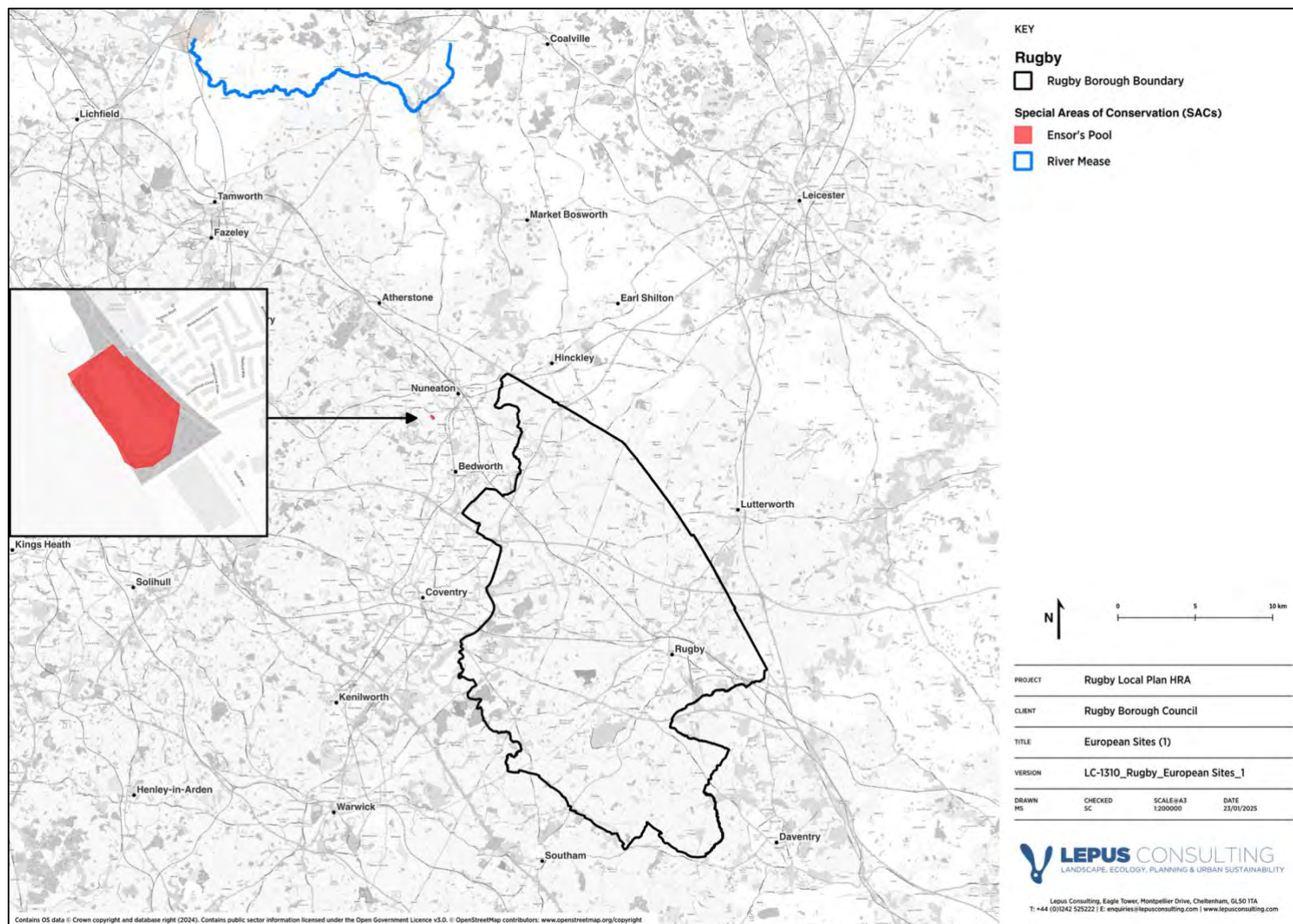


Figure 3.1: European sites located within HRA search area (1)

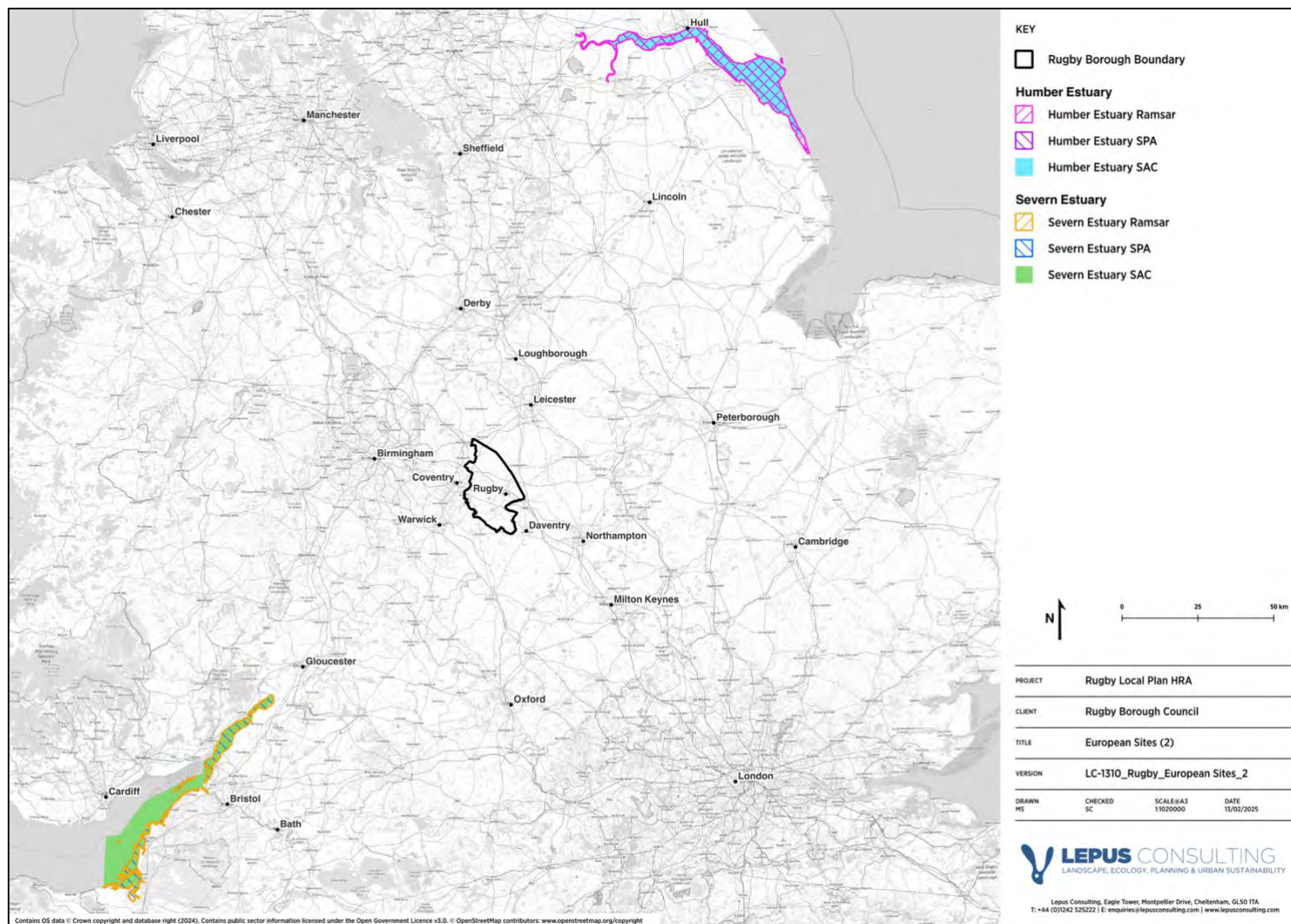


Figure 3.2: European sites located within HRA search area (2)

3.4 Air quality

- 3.4.1 Air pollution can affect a European site if it has an adverse effect on its features of qualifying interest. The main mechanisms through which air pollution can have an adverse effect is through eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides). Deposition of air pollutants can alter the soil and plant composition and species which depend upon these.
- 3.4.2 As highlighted through the review of threats and pressures at European sites (**Appendix B**), air pollution, and in particular atmospheric nitrogen deposition, has been identified as a threat or pressure for qualifying features of a number of European sites within the relevant Natural England SIPs and Supplementary Conservation Advice Notes.
- 3.4.3 Excess atmospheric nitrogen deposition within an ecosystem or habitat can disrupt the delicate balance of ecological processes interacting with one another. As the availability of nitrogen increases in the local environment, some plants that are characteristic of that ecosystem may become competitively excluded in favour of more nitrophilic plants. It also upsets the ammonium and nitrate balance of the ecosystem, which disrupts the growth, structure and resilience of some plant species.
- 3.4.4 Excess nitrogen deposition often leads to the acidification of soils and a reduction in the soils' buffering capacity (the ability of soil to resist pH changes). It can also render the ecosystem more susceptible to adverse effects of secondary stresses, such as frost or drought, and disturbance events, such as foraging by herbivores.
- 3.4.5 As an attempt to manage the negative consequences of atmospheric nitrogen deposition, 'critical loads' and 'critical levels' have been established for ecosystems in Europe. Each European site is host to a variety of habitats and species, the features of which are often designated a critical load for nitrogen deposition.
- 3.4.6 The critical loads of pollutants are defined as a "...quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge"²³. Critical levels are defined as "concentrations of pollutants in the atmosphere above which direct adverse effects on receptors, such as human beings, plants, ecosystems or materials, may occur according to present knowledge"²⁴.

²³ UNECE. ICP Modelling and Mapping Critical loads and levels approach. Available at: https://www.umweltbundesamt.de/en/Coordination_Centre_for_Effects [Date accessed: 03/12/25].

²⁴ Ibid

3.4.7 Natural England has developed a standard methodology for the assessment of traffic-related air quality impacts under the Habitats Regulations which is relevant to the HRA of land use plans which may result in a change in traffic flows²⁵. In addition, the Institute of Air Quality Management (IAQM)²⁶ and the Chartered Institute of Ecology and Environmental Management (CIEEM)²⁷ have also prepared advice on the assessment of air quality impacts at designated sites. This guidance sets thresholds for screening of likely significant (air quality) effects at the HRA screening stage (Stage 1 of the HRA process) and methodologies for further AA (Stage 2 of the HRA process) of air quality impacts where relevant.

3.4.8 Natural England's guidance (in the form of a series of questions below) has been applied to determine potential air quality impact pathways to European sites:

- Does the Local Plan give rise to emissions which are likely to reach a European site?
- Are the qualifying features of sites within 200m of a road sensitive to air pollution?
- Could the sensitive qualifying features of the site be exposed to emissions?
- Application of screening thresholds (alone and then, if necessary, in combination).

Does the Local Plan give rise to emissions which are likely to reach a European site?

3.4.9 The Local Plan will trigger housing, gypsy and traveller and employment development and as such increase traffic-related emissions. Air quality impacts have been shown to typically affect European sites within 10km of a plan boundary²⁸. Campman and Kite (2021) note that *"this zone is based on professional judgment recognising that the effects of growth from development beyond 10km will have been accounted for in the Nitrogen Futures modelling work business as usual scenario"*²⁹. This 10km distance threshold can be a useful guide to identify the broad areas that may be impacted by air quality. However, it is noted that consideration should also be given to larger residential or commercial allocations and their wider potential for air quality impacts in the context of the local and regional road network including key commuting areas set out below (**paragraph 3.4.10**).

²⁵ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at: <http://publications.naturalengland.org.uk/publication/4720542048845824> [Date accessed: 03/12/25].

²⁶ Holman et al (2020). A guide to the assessment of air quality impacts on designated nature conservation sites – version 1.1, Institute of Air Quality Management, London.

²⁷ CIEEM (2021) Advice on Ecological Assessment of Air Quality Impacts. Chartered Institute of Ecology and Environmental Management. Winchester, UK.

²⁸ Chapman, C and Kite, B. (2021) Main Report. Guidance on Decision-making Thresholds for Air Pollution. JNCC Report No. 696. Available at: <https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447> [Date accessed: 03/12/25].

²⁹ JNCC. Nitrogen Future. Available at: <https://jncc.gov.uk/our-work/nitrogen-futures/> [Date accessed: 03/12/25].

3.4.10 Data obtained from the Office for National Statistics highlights the most common destinations for journeys to work undertaken by car or van arising from and finishing in the Plan area³⁰. Key commuting destinations / origins include the neighbouring authority areas of Coventry, Daventry, Harborough, Nuneaton and Bedworth, and Warwick.

3.4.11 In addition, European sites beyond 10km of the Plan area but within the key commuting areas which are sensitive to air quality effects are also considered within this HRA, where they are linked to the Plan area via key strategic road links. These are road links which provide a clear route linking residential and employment areas within the Plan area. A 10km buffer from the Plan area is considered precautionary as it encompasses the key commuting areas and strategic road links that connect to the Plan area.

Are the qualifying features of sites within 200m of a road sensitive to air pollution?

3.4.12 It is widely accepted that air quality impacts are greatest within 200m of a road source, decreasing with distance^{31,32,33}. Baseline mapping data has been used to determine the proximity of European sites, and their qualifying features, to roads (within 200m) which may result in an exceedance of Natural England's screening thresholds.

3.4.13 The UK Air Pollution Information System (APIS) provides information on all European sites and the sensitivity of their qualifying features (habitats and / or species) to air pollution. This data has been interrogated, alongside a desk-based review of site-based data (**Appendix B**), to determine whether there may be impact pathways from the Local Plan to any European site through a change in atmospheric emissions.

3.4.14 As shown in **Table 3.1**, there is one European site located within 10km of the Plan area (which corresponds to the key commuting area) – Ensor's Pool SAC. This SAC is not sensitive to air quality impacts and is not located within 200m of a strategic road link. Air quality impact pathways to Ensor's Pool SAC can therefore be scoped out of the HRA process, and no further assessment is required.

3.5 Water quality and water quantity

3.5.1 Urban development coming forward through the Local Plan has the ability to affect water-dependent European sites through a number of impacts as listed below. These impacts have the potential to change the water balance (levels) and quality of water entering European sites:

- Change in surface permeability and run off rates;
- Increased water demand to supply new homes and businesses;
- Reduce quality of surface water run off; and
- Increased effluent discharge for treatment.

³⁰ Office for National Statistics (2011) Location of usual residence and place of work by method of travel to work (2001 specification). Travel by car or van only. Available at: <https://www.nomisweb.co.uk/census/2011/WU03UK/chart/1132462281> [Date accessed: 04/12/25].

³¹ The Highways Agency, Transport Scotland, Welsh Assembly Government, The Department for Regional Development Northern Ireland (2007) Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1: Air Quality.

³² Natural England (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report NECR 199.

³³ Bignal, K., Ashmore, M. & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

- 3.5.2 The Water Framework Directive (WFD) provides an indication of the health of the water environment and whether a water body is at a good status or potential. This is determined through an assessment of a range of elements relating to the biology and chemical quality of surface waters and quantitative and chemical quality of groundwater. To achieve good ecological status or potential, good chemical status or good groundwater status, every element assessed must be at good status or better. If one element is below its threshold for good status, then the status for the whole water body is classed below good. Surface water bodies can be classed as high, good, moderate, poor or bad status.
- 3.5.3 The WFD sets out areas which require special protection. These include areas designated for *“the protection of habitats or species where the maintenance or improvement of the status of water is an important factor in their protection including relevant Natura 2000 sites designated under Directive 92/43/EEC (the Habitats Directive) and Directive 79/409/EEC (the Birds Directive)”*³⁴.
- 3.5.4 The main watercourse running through the Plan area is the River Avon which flows in a westerly direction across the central area of the borough, through the town of Rugby towards its confluence with the River Severn near Tewkesbury. Key tributaries of the River Avon within the Plan area include Clifton Brook, the River Swift and Sow Brook.
- 3.5.5 The River Leam flows in a westerly direction across the southern area of the borough towards its confluence with the River Avon near Warwick. Tributaries of the River Avon within the Plan area include Millholme Brook and Rains Brook. The River Anker originates in the northern area of the borough, near Wolvey and flows in a north-westerly direction towards Nuneaton. Sketchley Brook and Harrow Brook flow by the northern boundary, and there are also canals within the borough. The Oxford Canal connects the town of Rugby with Coventry, the Grand Union Canal crosses through the south of the borough, and the Ashby-de-la-Zouch Canal crosses through the north of the borough.
- 3.5.6 The Local Plan administrative area falls predominantly within the Severn River Basin District, with a small area to the north of the Plan area falling within the Humber River Basin District. These River Basin Districts are sub-divided into several surface water management catchments (SWMCs)³⁵. The Plan area is located predominantly within the Avon and Warwickshire SWMC, with small sections of the Plan area to the north located within the Soar SWMC and Tame, Anker and Mease SWMC, as illustrated in **Figure 3.3**.
- 3.5.7 It is noted that the Plan area does not lie within the River Mease SAC nutrient neutrality catchment³⁶.

³⁴ Official Journal of the European Communities (2000) Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy. Available at: https://eur-lex.europa.eu/resource.html?uri=cellar:5c835afb-2ec6-4577-bdf8-756d3d694eeb.0004.02/DOC_1&format=PDF [Date accessed: 03/12/25].

³⁵ Department for Environment Food & Rural Affairs. River basin districts, England. Available at: <https://environment.data.gov.uk/catchment-planning/> [Date accessed: 03/12/25].

³⁶ Note: the Local Plan area is not located within the River Mease SAC nutrient neutrality catchment. WOOD, A., WAKE, H. and MCKENDRICK-SMITH, K. 2022. River Mease Special Area of Conservation – Evidence Pack. Natural England Technical Information Note. TIN200 Natural England. Available at: <http://publications.naturalengland.org.uk/publication/5254733043597312> [Date accessed: 03/12/25].

- 3.5.8 River Basin Management Plans (RBMPs) provide a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, they also inform decisions on land-use planning. **Appendix A** provides a summary of the Severn and Humber RBMPs and HRAs which were prepared to support these plans.
- 3.5.9 Catchment Abstraction Management Plans (CAMS) are six-year strategies developed by the Environment Agency (EA) for managing water resources at the local level, produced for every river catchment area in England and Wales. Through the CAMS process, the EA prepares an Abstraction Licensing Strategy (ALS) to manage water resources and contribute to implementation of the WFD. ALSs feed into Water Resource Management Plans (WRMPs) in terms of determining and managing current and future pressures on water resources and how this will be managed by the relevant water companies.
- 3.5.10 The Plan area is located predominantly within the Warwickshire Avon ALS catchment³⁷, with a small area to the north east within the Soar³⁸, and a small area to the north within the Tame, Anker and Mease³⁹ abstraction licensing strategy areas. Only the Tame, Anker and Mease ALS catchment contains European sites: River Mease SAC and Ensor's Pool SAC. The strategies for these areas set out how water resources are used, indicating areas where water is available for further abstraction. The Warwickshire Avon ALS encompasses the River Avon, with water being abstracted predominantly for public water supply, agriculture and industry. Within the catchment, the ALS indicates a Hands-off-Flow (HoF)⁴⁰ of 2,568 ml/d at the lower end of the River Severn at Deerhurst gauging station to safeguard flows⁴¹.
- 3.5.11 For the purposes of water resource planning and supply, the country is divided into Water Resource Zones (WRZs). WRZs are defined by the EA as the "*largest possible zone in which customers share the same risk of a resource shortfall*"⁴². These WRZs have been amalgamated into larger sub-regional supply areas. The Plan area is served by the Strategic Grid WRZ as supplied by Severn Trent Water (see **Figure 3.4**).

³⁷ Environment Agency (2023) Warwickshire Avon Abstraction Licensing Strategy. Available at: <https://assets.publishing.service.gov.uk/media/642e90bc7de82b0012313726/Warwickshire-Avon-ALS.pdf> [Date accessed: 03/12/25].

³⁸ Environment Agency (2020) Soar Abstraction Licensing Strategy. Available at: https://assets.publishing.service.gov.uk/media/5f574829e90e070995ad8255/Soar_Abstraction_Licensing_Strategy.pdf [Date accessed: 03/12/25].

³⁹ Environment Agency (2022) Tame, Anker and Mease Abstraction Licensing Strategy. Available at: <https://assets.publishing.service.gov.uk/media/62b418848fa8f53572e3db13/Tame-Anker-and-Mease-abstraction-licensing-strategy.pdf> [Date accessed: 04/12/25].

⁴⁰ HoF is a condition attached to an abstraction licence which states that if a river flow falls below the level specified on the licence, the abstractor will be required to reduce or stop the abstraction.

⁴¹ JBA Consulting (2024) Coventry and Warwickshire Sub-Regional Water Cycle Study – Stage 1. Available at: <https://www.southwarwickshire.org.uk/doc/213040/name/Water%20Cycle%20Study%20Final%20Draft.pdf> [Date accessed: 04/12/25].

⁴² Severn Trent. A1 Water Resource Zones. Available at: https://www.severntrent.com/content/dam/stw/ST_Corporate/About_us/Docs/Appendix-A-How-much-water-do-we-have-available.pdf [Date accessed: 04/12/25].

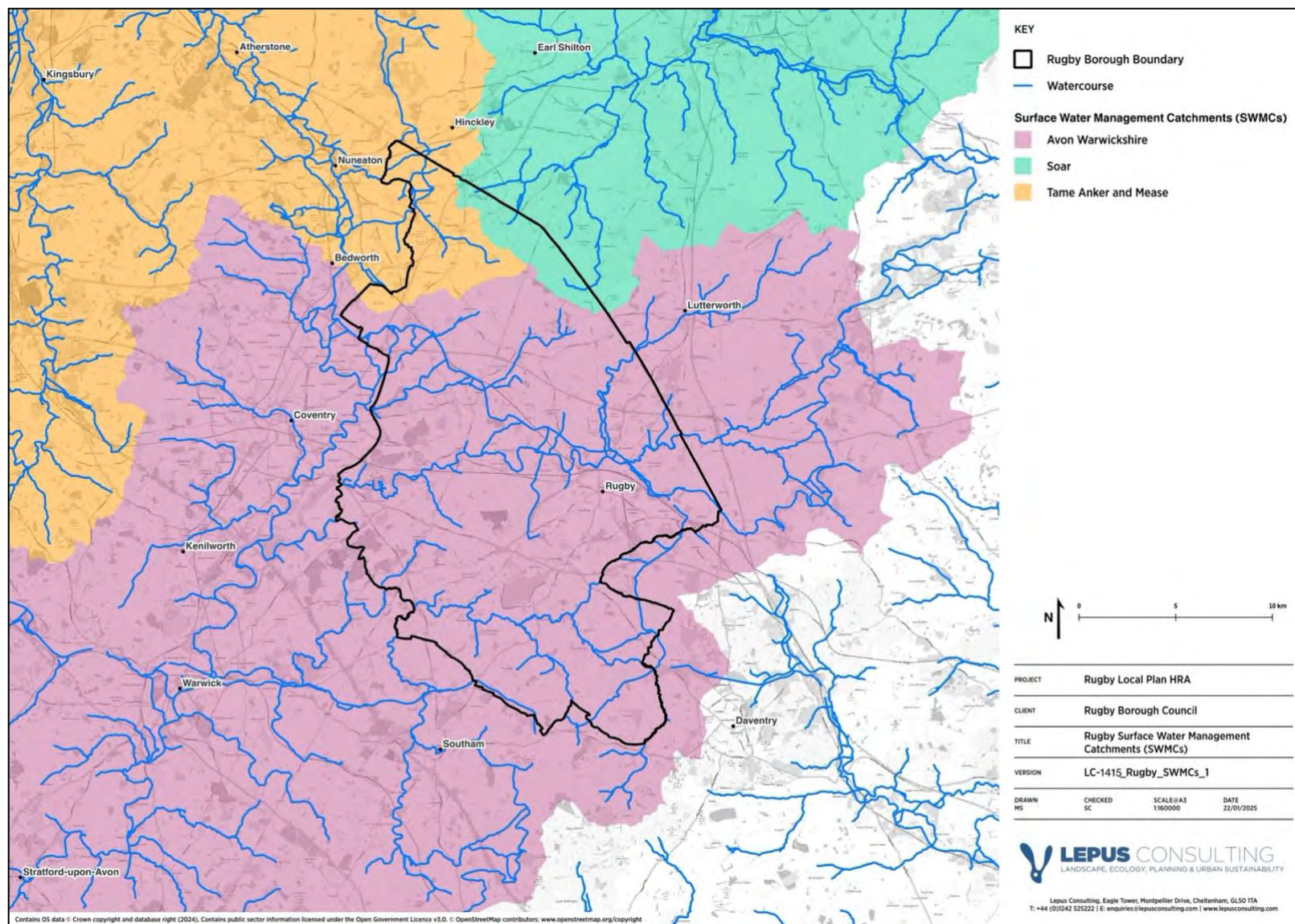


Figure 3.3: Surface Water Management Catchments within the Plan area

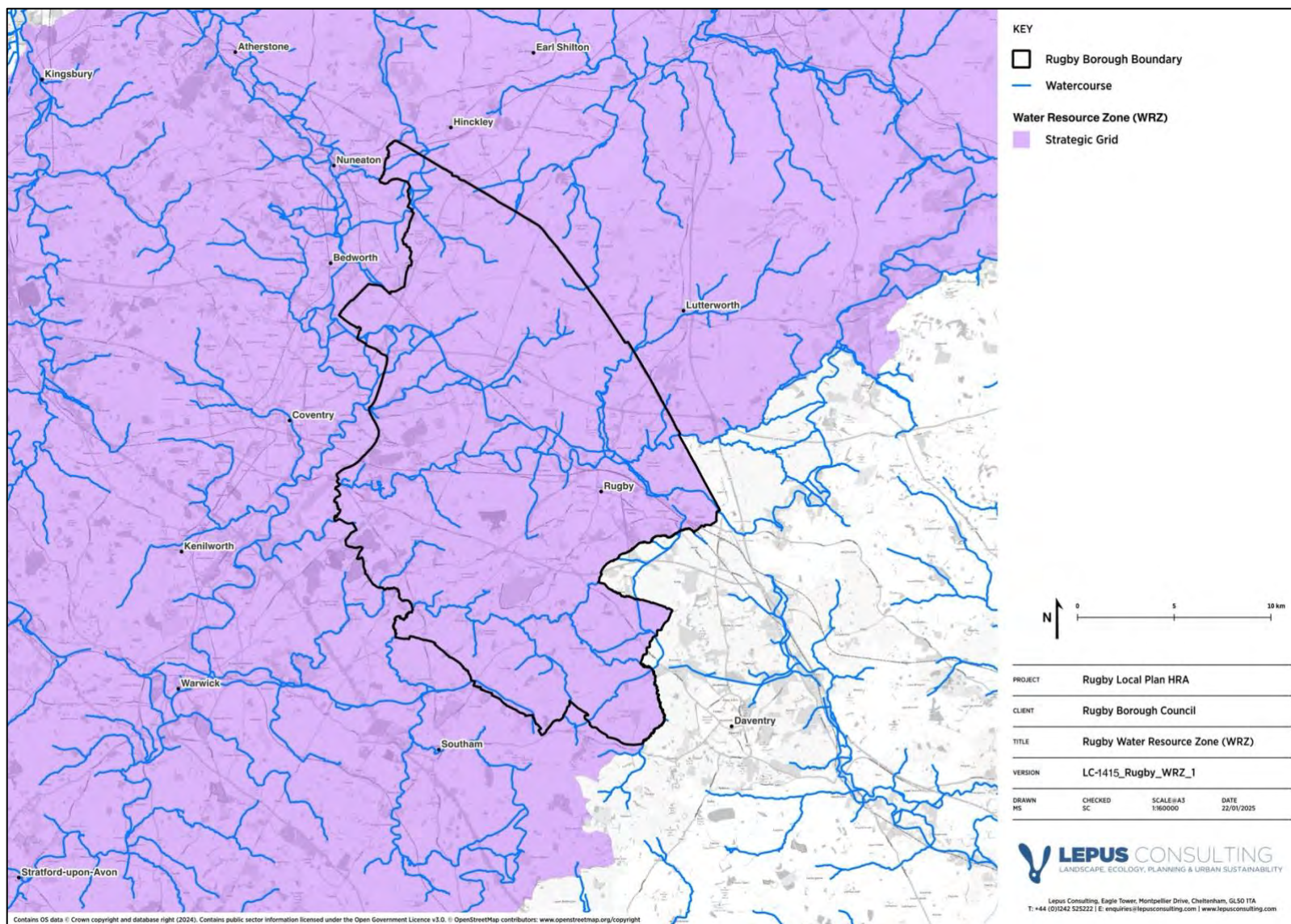


Figure 3.4: Water Resource Zone within the Plan area

- 3.5.12 Decisions relating to water abstraction for supply and disposal of water are controlled through a number of licensing mechanisms and a high-level water planning framework which is subject to HRA. This ensures the protection of the water environment and compliance with the WFD.
- 3.5.13 The water service provider for the Plan area is Severn Trent Water (STW). It is a statutory requirement that every five years water companies produce and publish a WRMP. A WRMP demonstrates long term plans to accommodate the impacts of population growth, drought, environmental obligations and climate change uncertainty in order to balance supply and demand.
- 3.5.14 STW's WRMP (known as WRMP24)⁴³ was published in April 2025. It identifies a significant long-term supply-demand deficit within the WRZ. The WRMP therefore outlines a number of demand management measures that need to be taken to ensure continued sustainable sources of water supply. The Local Plan Water Cycle Study (WCS)⁴⁴ identifies water resources as under significant pressure, and emphasises the importance of new developments not contributing to an unsustainable increase in water abstraction. The study sets out provisions to help achieve the Government's ambition of 110 litres per day per person by 2050 including universal metering, reducing leakage by 50%, delivering the customer water efficiency plan, and Government water labelling. The study also recommends that Local Planning Authorities (LPAs) should encourage developers to go beyond building regulations, supported by STW's incentives for water-efficient design in new builds. Growth during the Local Plan period is expected to be approximately 10,812 dwellings (Policy S2), with higher figures of up to 18,628 homes tested in the WCS growth scenarios⁴⁵. When compared with the much larger population increase forecast across STW's Strategic Grid WRZ, (approximately 1.1 million additional people over the next 25 years), Rugby's growth represents only a small proportion of total WRZ-wide demand growth. The Council has been in ongoing liaison with the water companies throughout the plan making process to ensure that appropriate and sufficient supply can be made for infrastructure, and that the emerging growth proposals can be supported. This forms part of the Duty to Cooperate on strategic cross-border issues and will inform the Infrastructure Delivery Plan which forms a critical component of the Local Plan evidence base.
- 3.5.15 The Water Industry Act 1991, as amended by the Water Act 2003, made it a statutory requirement for water companies to produce and maintain a Drought Plan every 5 years. A Drought Plan sets out the framework for a water company to follow in times of drought and dry weather to maintain water supply and links strategically with the WRMPs. The STW Drought Plan⁴⁶ tests a number of drought / dry weather scenarios under different climatic conditions to show that supply can be maintained.
- 3.5.16 As set out in **paragraph 3.5.9**, abstractions for water supply are managed by the EA through licences issued in line with their CAMS process.

⁴³ Severn Trent Water (2024), Water Resources Management Plan. Available at <https://www.severntrent.com/about-us/our-plans/water-resources-management-plan/wrmp24-final-documents/> [Date accessed: 05/12/25].

⁴⁴ JBA Consulting (2025) Coventry and Warwickshire Sub-Regional Water Cycle Study – Stage 2.

⁴⁵ JBA Consulting (2025) Coventry and Warwickshire Sub-Regional Water Cycle Study – Stage 2.

⁴⁶ Severn Trent Water (2022) Drought Plan 2022-2027. Available at: <https://www.severntrent.com/content/dam/stw-plc/water-resource-zones/drought-plan-2022-2027.pdf> [Date accessed: 04/12/25].

- 3.5.17 WRMPs are linked to Drought Plans which detail the steps that would be taken to ensure supplies can be maintained whilst minimising the impacts to rivers and the environment during drought events. The STW Drought Plan covers the period from 2027 to 2032⁴⁷ and sets out a series of actions to address droughts, including to reduce customer demand for water, and identifies catchments (including the River Avon) where drought orders and permits may be required.
- 3.5.18 STW provides wastewater services to the Plan area. Sewerage Undertakers have a duty under Section 94 of the Water Industry Act 1991 to provide sewerage and treat wastewater arising from new domestic development.
- 3.5.19 A Stage 1 WCS⁴⁸ was undertaken on behalf of LPAs within the sub-region including Rugby Borough Council⁴⁹. This study assesses the impacts on water supply, wastewater collection and treatment and water quality from future Local Plan development. STW provided an assessment of Wastewater Treatment Works (WwTWs) serving growth in the Plan area based on hydraulic capacity and headroom in the environmental permit. The WCS also contains a flow permit assessment. This identified that whilst proposed growth in the sub-region can be accommodated at a number of WwTW, some treatment works may require upgrades to ensure growth can occur without causing flow permits to be exceeded.
- 3.5.20 The WCS identified receptors to changes in water quality as a result of discharge from effluent at WwTWs into the water environment. A Stage 2 WCS⁵⁰ has also been prepared, which builds on the 'Warwickshire sub-regional' Phase 1 WCS, to specifically support the Rugby Local Plan. It provides a detailed assessment of water resources and supply and wastewater treatment and has informed the assessments made in this HRA report.
- 3.5.21 As noted in **paragraph 3.5.6**, the Plan area predominantly falls within hydrological catchments associated with the Severn Estuary and to a lesser extent the Humber Estuary. The Severn Estuary SAC and Severn Estuary Ramsar are hydrologically linked to the Plan area via the River Avon which is a tributary of the River Severn. The Humber Estuary SAC and Humber Estuary Ramsar are linked to the Plan area via the Sence, Anker and Bourne Rivers and Lakes and Blythe Rivers operational catchments.
- 3.5.22 The qualifying features of the Severn Estuary SAC include, among other features, a number of species of migratory fish including Twaite Shad (*Alosa fallax*), River Lamprey (*Lampetra fluviatilis*) and Sea Lamprey (*Petromyzon marinus*). Criterion 4 of the Severn Estuary Ramsar designation notes that the site is important for the run of migratory fish between sea and river via estuary, including the SAC species and additionally species of Salmon (*Salmo salar*), Sea Trout (*S. trutta*), Allis Shad (*Alosa alosa*) and European eel (*Anguilla anguilla*).

⁴⁷ Severn Trent Water (2027) Final Drought Plan.

⁴⁸ JBA Consulting (2024) Coventry and Warwickshire Sub-Regional Water Cycle Study – Stage 1.

⁴⁹ LPAs included Nuneaton and Bedworth Borough Council, Coventry City Council, Rugby Borough Council, Warwick District Council, North Warwickshire Borough Council and Stratford-on-Avon District Council.

⁵⁰ JBA Consulting (2025) Rugby Borough Council Water Cycle Study Stage 2. 30 November 2025.

- 3.5.23 The 'Unlocking the Severn' project⁵¹, which is run in partnership between the Canal and Rivers Trust, the Severn Rivers Trust, the EA and Natural England, has created four new fish passes along the River Severn in Worcestershire to allow fish to migrate upstream. Work is also being undertaken as part of the project to monitor fish. This has shown that sufficient numbers of Twaite Shad can pass weir barriers aided by the tides. The River Severn RBMP sets out several catchment partnership measures for the Warwickshire Avon catchment, which include creation of fish passes to reduce barriers to fish movement further up the River Severn catchment⁵².
- 3.5.24 Communication with Natural England⁵³ has indicated that migratory fish species associated with the Humber Estuary SAC and the Humber Estuary Ramsar include Sea Lamprey and River Lamprey. The River Lamprey has been recorded as far upstream as the River Dove (on the Staffordshire/Derbyshire border).
- 3.5.25 Any potential deterioration in water quality or habitat outside the Severn Estuary SAC and Ramsar or the Humber Estuary SAC and Ramsar as a result of the Local Plan may have implications for the migration of fish to upstream spawning habitat if it results in a barrier to movement. The impact of the Local Plan upon functionally linked watercourses and habitat through a deterioration in water quality, flows and loss and / or deterioration of riparian and in-stream habitat may therefore have adverse effects on the achievement of the conservation objectives which aim to maintain and restore the condition of these features for relevant qualifying species. Natural England consider that Good Ecological Status under the WFD is an appropriate standard for functionally linked watercourses⁵⁴.
- 3.5.26 In developing its WRMP24, STW examined the future forecast water supply/demand balance and determined how any deficit between forecast demand and reliable water supply availability should be addressed. STW identified 38 options within its preferred WRMP. Through the HRA process supporting the preparation of the WRMP⁵⁵, 19 preferred plan options were screened out. A total of 19 options were identified as requiring an AA for construction and/or operation.
- 3.5.27 The HRA evaluated the combined (in-combination) effects of the WRMP options, including potential impacts on the River Trent as a functionally linked watercourse to the Humber Estuary SAC, SPA, and Ramsar site. Its functional linkage specifically relates to migratory fish and freshwater inputs to the estuary. The assessment also considered potential effects on the Severn Estuary SAC, SPA, and Ramsar site, together with associated functionally linked watercourses.

⁵¹ Rivers and Canals Trust. Unlocking the Seven Project. Available at: <https://unlockingthesevern.co.uk/our-fish-passes/> [Date accessed: 03/12/25].

⁵² Environment Agency (2022) Severn River Basin Management Plan. Available at: <https://www.gov.uk/guidance/severn-river-basin-district-river-basin-management-plan-updated-202> [Date accessed: 04/12/25].

⁵³ JNCC. Humber Estuary. Available at: <https://sac.jncc.gov.uk/site/UK0030170> [Date accessed: 10/12/25].

⁵⁴ Defra. 2014. Water Framework Directive implementation in England and Wales: new and updated standards to protect the water environment (publishing.service.gov.uk). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307788/river-basin-planning-standards.pdf [Date accessed: 04/12/25].

⁵⁵ Severn Trent Water (2025) Habitats Regulations Assessment. Final Water Resources Management Plan 2024 Information to support an assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017

- 3.5.28 The HRA AA for the WRMP water supply options concluded that established standards and best-practice construction mitigation measures are sufficient to avoid adverse effects upon these European sites. For several options, the need for further hydrological assessment and surveys to confirm the presence and use of offsite functionally linked watercourses was identified prior to project-level HRAs. Additional mitigation, such as restrictions on abstraction licence volumes and timing, and reviews of HoF requirements, was also identified as necessary to ensure no adverse effects occur.
- 3.5.29 The WRMP is based on population projections and forecasts to 2050-2051, which includes Rugby. It can, therefore, be concluded that the Local Plan will not result in a likely significant effect on any European sites from increased water demand, either alone or in combination with all other new plans and projects that would be served by the public water supply. Water quantity impacts can consequently be scoped out of the HRA process.
- 3.5.30 Taking into consideration potential changes in water quality (through surface water run-off and discharges from WwTWs), European sites were screened for potential hydrological impact pathways. This review looked at European sites which are hydrologically linked to the Plan area and hydrologically sensitive, including impacts upon functionally linked watercourses. **Table 3.3** indicates those European sites that will be scoped into the screening assessment (**Chapter 4**) for further consideration in the HRA process in terms of water quality impacts.

Table 3.2: Review of hydrological impact pathways to European sites within the influence of the Local Plan

European site name	Is the European site sensitive to a change in water quality and is it hydrologically connected to the Plan area?	Will the European site be scoped in for further assessment in the HRA process?
Ensor's Pool SAC	<p>Ensor's Pool SAC lies on the western edge of Nuneaton in the north of Warwickshire and formed in an abandoned clay pit and is groundwater fed. Its qualifying feature is native White-Clawed Crayfish (<i>Austropotamobius pallipes</i>). The SIP for the SAC does not identify water quality or water quantity issues as a threat at the SAC56.</p> <p>As part of the HRA work undertaken in support of the adopted Warwickshire Minerals Plan HRA, the EA recommended application of a 3km catchment within which water impacts are likely⁵⁷. Taking into account the distance of the SAC from the Plan area (approximately 4km to the west) and the fact that the SAC is groundwater fed, there are unlikely to be water receptors that connect development proposed in the Local Plan with the SAC.</p>	No
River Mease SAC	The River Mease SAC is designated for a number of river qualifying habitats, White Clawed Crayfish; Spined Loach (<i>Cobitis taenia</i>); Bullhead (<i>Cottus gobio</i>); and Otter (<i>Lutra lutra</i>). The Plan area does not	No

⁵⁶ Natural England (2014) Site Improvement Plan: Ensor's Pool. Available at: <https://publications.naturalengland.org.uk/publication/5364843502632960> [Date accessed: 04/12/25].

⁵⁷ Warwickshire County Council (2021). Habitats Regulations Assessment. SCREENING DECISION AND APPROPRIATE ASSESSMENT UPDATED, September 2021. <https://www.warwickshire.gov.uk/mineral-waste-plans/minerals-development-framework/> Available at: [Date accessed: 04/12/25].

European site name	Is the European site sensitive to a change in water quality and is it hydrologically connected to the Plan area?	Will the European site be scoped in for further assessment in the HRA process?
	lie within the River Mease SAC nutrient neutrality catchment ⁵⁸ and is not hydrologically linked to the Plan area.	
Severn Estuary SAC	<p>The Plan area is predominantly located within the River Severn District Basin and the Avon Warwickshire SWMC. The Severn Estuary SAC is located downstream of the Plan area and connected via the River Avon (and its tributaries) which meets the River Severn at Tewkesbury.</p> <p>The qualifying features of the SAC are likely to use watercourses upstream of the designations for certain stages of their life cycle (e.g. spawning), therefore functionally linked watercourses are potentially located within / connected to the Plan area. The SAC is therefore likely to be sensitive to changes in water quality as a result of development associated with the Local Plan and will be scoped in for further assessment.</p>	Yes
Severn Estuary Ramsar	<p>The Plan area is predominantly located within the River Severn District Basin and the Avon Warwickshire SWMC. The Severn Estuary Ramsar is located downstream of the Plan area and connected via the River Avon (and its tributaries) which meets the River Severn at Tewkesbury.</p> <p>The qualifying features of the SAC and Ramsar are likely to use watercourses upstream of the designations for certain stages of their life cycle (e.g. spawning) and therefore functionally linked watercourses are potentially located within / connected to the Plan area. The Ramsar is therefore likely to be sensitive to changes in water quality as a result of development associated with the Local Plan and will be scoped in for further assessment.</p>	Yes
Humber Estuary SAC	<p>A small area of the Plan area is located within the Humber River District Basin and the Soar and Tame Anker Mease SWMCs. The Humber Estuary SAC is located downstream of the Plan area and connected via the River Soar which meets the River Trent at Trent Lock, Derbyshire, and ultimately feeds into the Humber Estuary.</p> <p>The qualifying features of the SAC are likely to use watercourses upstream of the designations for certain stages of their life cycle (e.g. spawning) and therefore functionally linked watercourses are potentially located within / connected to the Plan area.</p>	Yes
Humber Estuary Ramsar	<p>A small area of the Plan area is located within the Humber River District Basin and the Soar and Tame Anker Mease SWMCs. The Humber Estuary SAC is located downstream of the Plan area and connected via the River Soar which meets the River Trent at Trent Lock, Derbyshire, and ultimately feeds into the Humber Estuary.</p> <p>The qualifying features of the Ramsar are likely to use watercourses upstream of the designations for certain stages of their life cycle (e.g.</p>	Yes

⁵⁸ Note: the Local Plan area is not located within the River Mease SAC nutrient neutrality catchment. WOOD, A., WAKE, H. and MCKENDRICK-SMITH, K. 2022. River Mease Special Area of Conservation – Evidence Pack. Natural England Technical Information Note. TIN200 Natural England. Available at: <http://publications.naturalengland.org.uk/publication/5254733043597312> [Date accessed: 04/12/25].

European site name	Is the European site sensitive to a change in water quality and is it hydrologically connected to the Plan area?	Will the European site be scoped in for further assessment in the HRA process?
	spawning) and therefore functionally linked watercourses are potentially located within / connected to the Plan area.	

3.6 Recreational pressure

- 3.6.1 Increased recreational pressure at European sites can result in damage to habitats through erosion and compaction, troubling of grazing stock, causing changes in behaviour to animals such as birds at nesting and feeding sites, spreading invasive species, dog fouling and tree climbing etc.
- 3.6.2 A common approach taken across the UK to address recreational impacts at European sites is to establish a buffer zone or Zone of Influence (ZOI) based on detailed visitor survey data. The ZOI is the area within which there are likely to be significant effects arising from recreational activities undertaken by additional residents due to growth. This is often calculated by taking the distance at which 75% of interviewees surveyed have travelled to reach a particular site (based on a review of visitor survey data). Where available, buffer distances have been applied to determine potential pathways of recreational and urbanisation effects from the Local Plan.
- 3.6.3 The broad principle of buffer zones is one component of the HRA screening process for recreational pressures. The recreational draw of a European site depends on a number of factors. These include the extent and range of facilities provided (in particular parking), accessibility both within the European site and links to the wider area, incorporation of a European site as part of a wider designation, such as a National Park, and the site's promotion. A review of recreational impact assessments undertaken for other European sites across the UK indicates visitors typically live within 4.2 km (overall median value) of nature conservation sites and that the majority (75%) live within 12.6 km⁵⁹. However, this review recognises that some visitors are prepared to travel longer distances to visit particular sites, for instance coastal and wetland sites.
- 3.6.4 As such, a precautionary distance of 15km has been applied to the scoping of European sites which may be sensitive to potential recreational impact pathways. This scoping exercise is detailed in the following paragraphs and draws on a review of Natural England data which identifies vulnerabilities at each European site (**Appendix B**).

⁵⁹ Weitowitz, D, C. Panter, C. Hoskin, R. and Liley, D. (October 2019) The effect of urban development on visitor numbers to nearby protected nature conservation sites. Journal of Urban Ecology, Volume 5, Issue 1.

- 3.6.5 There is one European site located within 15km of the Plan Area: Ensor's Pool SAC. This SAC lies within the Ensor's Pool Nature Reserve on the western edge of Nuneaton in the north of Warwickshire and is formed in an abandoned clay pit. It is located within an urban setting. The SAC was designated as it supported a large population of White-Clawed Crayfish. Recent surveys have however recorded no crayfish in the pool, the cause of which may be associated with the spread of 'Crayfish Plague'⁶⁰. Whilst there are footpaths which run within the Nature Reserve, recreational impacts are not identified as a threat/pressure at the SAC within the SIP or Natural England's supplementary advice. Although angling is prohibited on Ensor's Pool, unauthorised fishing does take place⁶¹. Given the location of Ensor's Pool SAC within the 15km recreational impact pathway buffer (4km from the Plan boundary), and the potential for unauthorised recreational activity, the SAC will be scoped in for recreational LSEs.

3.7 Urbanisation effects

- 3.7.1 Urbanisation effects typically occur when development is located close to a European site boundary. These may include impacts such as noise disturbance, lighting effects, cat predation, fly-tipping, wildfire, littering and vandalism. Strategic mitigation schemes elsewhere in the UK have set a presumption against development (i.e. no net increase in residential dwellings) on the basis of site-specific evidence to safeguard against these impacts of approximately 400m. There are no European sites located within 400m of the Plan area, with the closest being Ensor's Pool SAC located 4km to its west. Therefore, the Local Plan is unlikely to have an urbanisation effect upon any European site, and this impact pathway can be scoped out.

3.8 European sites and threats and pressures

- 3.8.1 The impact pathways which have the potential to affect European sites listed in **Table 3.1** are summarised in **Table 3.3**. These will form the basis of the HRA screening assessment.

⁶⁰ David Rogers Associated (2015) White-clawed crayfish survey for Ensor's Pool SSSI/SAC (Warwickshire). Natural England Publication IPENS065. Available at: <https://publications.naturalengland.org.uk/publication/6577286383927296> [Date accessed: 04/12/25].

⁶¹ Natural England and other parties (2015) White-clawed crayfish survey for Ensor's Pool SSSI/SAC (Warwickshire). Improvement Programme for England's Natura 2000 Sites (IPENS) – Planning for the Future IPENS065.

Table 3.3: Summary of impact pathways to European sites which may be associated with the Local Plan

European site name	Air Pollution Impact Pathway?	Water Quality Impact Pathway?	Water Quantity Impact Pathway?	Recreational Pressure Impact Pathway?	Urbanisation Impact Pathway?
Ensor's Pool SAC	No	No	No	Yes	No
Humber Estuary Ramsar	No	Yes	No	No	No
Humber Estuary SAC	No	Yes	No	No	No
Humber Estuary SPA	No	No	No	No	No
River Mease SAC	No	No	No	No	No
Severn Estuary Ramsar	No	Yes	No	No	No
Severn Estuary SAC	No	Yes	No	No	No
Severn Estuary SPA	No	No	No	No	No

4 Screening Preferred Options

4.1 Introduction

4.1.1 This section of the HRA comprises the screening stage: Stage 1 of the HRA process (see **Figure 2.1**). The screening exercise draws on information regarding threats and pressures at European sites scoped into the HRA process in **Chapter 3** of this report. This chapter updates the screening assessment that was undertaken of the Regulation 18 Preferred Options draft (see **Section 1.3**), and re-screens each component of the Proposed Submission Draft Local Plan for LSEs and identifies the requirement for AA.

4.2 Screening

4.2.1 The Local Plan is not directly connected with or necessary to the management of any European site and as such it is not exempted from the HRA process. In addition, it cannot be excluded or eliminated from the process on the basis of no conceivable effect. It is therefore necessary to determine whether the Local Plan will have an LSE on any European site, either alone or in-combination with other aspects of the Local Plan or other plans and projects.

4.2.2 In order to identify LSEs upon European sites, each component of the Proposed Submission Draft Local Plan has been appraised against the HRA screening criteria (see **Appendix C**), taking into consideration case law and best practice. The assessment of LSEs takes no account of mitigation to ensure compliance with the People Over Wind ruling⁶².

4.2.3 It is concluded that LSEs, from either the Local Plan alone or in combination with other plans or projects, could be screened out for a number of components. This is because they fell into the following categories (see **Table 2.1** for a description of each category):

- Category B: Policies listing general criteria for testing the acceptability / sustainability of proposals;
- Category D: Environmental protection / site safeguarding; or
- Category F: Policies or proposals that cannot lead to development or other change.

4.2.4 The following components in the Local Plan set out in **Table 4.1** were however considered to have an LSE in combination with other plans and projects (Category L).

⁶² InfoCuria (2018) Case C-323/17. Available at:
<http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN> [Date accessed: 04/12/25].

Table 4.1: Summary of screened in components of the Local Plan

(Note: only components screened into the HRA process have been included in the summary table below. The screening outcome for all components is provided at **Appendix C**)

Policy Number	Policy Name	Screening Category
S2	Strategy for homes	L
S3	Strategy for employment land	L
S4	Sites for Gypsies and Travellers	L
S6	Residential allocation	L
S7	Employment allocations	L
S8	South West Rugby	L
S9	South West Rugby spine road network	L
C1	Rugby town centre	L

4.2.5 Likely significant in-combination water quality effects were identified for all development allocations (**Figures C.1 to C.3**) at functionally linked watercourses associated with the Severn Estuary SAC, Severn Estuary Ramsar, Humber Estuary SAC and Humber Estuary Ramsar and for all allocations in terms of potential recreational LSEs at Ensor's Pool SAC.

4.2.6 As required under Regulation 105 of the Habitats Regulations, an assessment has been undertaken of LSEs of the Local Plan upon European sites. The screening evaluation (**Appendix C**) indicates that the Local Plan has the potential to have LSEs at the above European sites. The screening assessment takes no account of mitigation measures that the Local Plan may incorporate to mitigate adverse impacts upon European sites. It is therefore concluded that the Local Plan will be screened into the HRA process. The Local Plan therefore progresses to the next stage of the HRA process: AA.

5 Water Quality Appropriate Assessment

5.1 Introduction

5.1.1 This chapter of the AA evaluates the potential ecological effects arising from a deterioration in water quality linked to growth associated with the Local Plan, considering each European site in light of its conservation objectives.

5.1.2 The HRA screening process in **Chapter 4** concluded that a number of Local Plan policies and all allocations have the potential to result in likely significant hydrological impacts at functionally linked watercourses associated with the Severn Estuary SAC, Severn Estuary Ramsar, Humber Estuary SAC and Humber Estuary Ramsar. They were screened into the HRA process and all allocations.

- Policy S2 – Strategy for homes;
- Policy S3 – Strategy for employment land;
- Policy S4 – Sites for Gypsies and Travellers;
- Policy S6 – Residential allocations;
- Policy S7 – Employment allocations;
- Policy S8 – South West Rugby;
- Policy S9 – South West Rugby spine road network; and
- Policy C1 – Rugby town centre.

5.1.3 As noted in **Section 3.5**, development has the potential to reduce the quality of water entering a catchment through processes such as sedimentation, accidental spillage of chemicals and materials and operational surface water runoff. Water quality may also be reduced through effluent discharges at WwTWs. This change in water quality can increase nutrient inputs into a catchment which can lead to algal blooms, reduce dissolved oxygen and increase turbidity. This can affect the overall condition of the receiving waterbody and may have adverse effects at hydrologically sensitive and connected European sites and their qualifying features.

5.1.4 Together the Government, the EA and the water companies are responsible for preparing plans and strategies and implementing a regulatory framework to ensure there is enough water for the future needs of both people and the environment and manage the treatment of wastewater. This is undertaken through a catchment-based approach and provides protection for European sites and ensures compliance with the WFD⁶³.

5.1.5 The WFD provides an indication of the health of the water environment and whether a water body is at good status or potential. This is determined through an assessment of a range of elements relating to the biology and chemical quality of surface waters and quantitative and chemical quality of groundwater. To achieve a good ecological status or potential, good chemical status or good groundwater status every single element assessed must be at a good status or better. If one element is below its threshold for good status, then the whole water body's status is classed below good. Surface water bodies can be classed as high, good, moderate, poor or bad status.

⁶³ https://environment.ec.europa.eu/topics/water/water-framework-directive_en.

5.1.6 The scoping assessment (presented in **Chapter 3**) identified water quality LSEs at functionally linked watercourses associated with the following four European sites:

- Humber Estuary SAC;
- Humber Estuary Ramsar;
- Severn Estuary SAC; and
- Severn Estuary Ramsar.

5.2 Mitigation

5.2.1 Policy CL3 of the Local Plan: Water Supply, Quality and Efficiency (**Box 1**) directly regulates water efficiency standards for new development, reducing risk of deterioration in downstream receiving waters.

Box 1: Policy CL3: Water Supply, Quality and Efficiency

- A. New development shall minimise the need for new infrastructure by being located where there is guaranteed and adequate water supply.
- B. New development must not either directly or indirectly through overloading wastewater treatment works result in adverse impacts on the quality of waterbodies, groundwater, or surface water, nor prevent waterbodies from achieving a good ecological and chemical status in the future. Any required upgrades to wastewater infrastructure will need to be completed before the development is occupied.
- C. 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.

5.2.2 Text supporting this policy noted that “*proposals should take into account Severn Trent’s Water Resource Management Plan and Strategic Business Plan as well as the findings of the Water Cycle Study and the River Basin Management Plan prepared by the Environment Agency (or updated versions of the same)*”.

5.2.3 Policy D5 of the Local Plan: Sustainable Drainage (**Box 2**) requires all development to incorporate Sustainable Drainage Systems (SuDS) in accordance with national standards, reducing diffuse pollution and sedimentation entering watercourses and therefore mitigating hydrological changes that could affect European sites.

Box 2: Policy D5: Sustainable Drainage

- A. All developments that create a need for surface water drainage shall include Sustainable Drainage Systems (SuDs) for the management of surface water runoff

B. SuDS shall:

- i. be located outside the floodplain;
- ii. integrate with green infrastructure;
- iii. be sufficient for the needs of the site;
- iv. promote enhanced biodiversity;
- v. improve water quality; and
- vi. provide good quality open spaces.

C. Infiltration SuDS are preferred. The developer shall carry out infiltration tests and a groundwater risk assessment to ensure that this is possible without polluting groundwater.

D. Where it is proven that infiltration is not possible, surface water should be discharged into a watercourse at pre-development greenfield runoff rates or into a surface water sewer if there is no nearby surface water body.

E. SuDs schemes shall have a maintenance schedule detailing maintenance boundaries, responsible parties, and arrangements to ensure management in perpetuity.

F. In exceptional circumstances, where a SuDs cannot be provided, it must be demonstrated that:

- i. an acceptable means of surface water disposal is provided which does not increase the risk of flooding or give rise to environmental problems; and
- ii. if located in an area known to suffer surface water flooding, the development will contribute to an off-site strategic solution.

5.2.4 Furthermore, Policy CL4 (Climate Adaption) requires resilience to climate-driven flood risk, and includes provisions relating to integrated water management, supporting measures that stabilise hydrological regimes and reduce runoff. Policy EN1 (Biodiversity and Geodiversity Protection) prohibits development that harms ecological features, including water-dependent habitats, reinforcing obligations to avoid pollution pathways. Policy S8 (South West Rugby) is a strategic allocation ensuring integrated drainage across the site and that growth does not outpace wastewater treatment capacity. Policy EN7 (Environmental Protection and Amenity) seeks to avoid unacceptable impacts of pollution, ensuring waste handling, storage and disposal cannot cause contamination or deterioration to environmental quality including water.

5.3 Humber Estuary SAC and Humber Estuary Ramsar

- 5.3.1 The Humber Estuary is the UK's second-largest coastal plan estuary (370 km²) formed at the confluence of the River Trent and River Ouse. It consists of extensive wetland and coastal habitats and nutrient-rich sediment that supports a wide variety of wintering, passage and breeding birds (especially geese, ducks and waders)⁶⁴. The estuary and its tributaries form the receiving environment for a wide hydrological catchment that includes the Local Plan area. As noted in **paragraph 3.5.22**, migratory species of fish for which the Humber Estuary SAC and Ramsar sites have been designated have the potential to use watercourses which are hydrologically linked to the Plan area for parts of their lifecycle, notably spawning. Natural England's SIP⁶⁵ identifies water pollution and changes in water quality as a key pressure affecting the ecological condition of the Humber Estuary. Therefore, a change in the quality of water in these upstream spawning locations has the potential to adversely impact these qualifying features.
- 5.3.2 The Humber Estuary's hydrodynamics are influenced by both tidal processes and riverine inputs. Water quality within the estuary is therefore governed by inputs from the extensive upstream catchment, including agricultural runoff, urban surface-water drainage, and discharges from WwTWs. Diffuse nutrient inputs from the catchment and point-source discharges have been identified as contributing to localised water quality issues, particularly nitrogen, ammonia, an organic loading⁶⁶.
- 5.3.3 Although improvements in wastewater treatment over recent decades have contributed to improved estuarine water quality, parts of the Humber continue to experience elevated nutrient concentrations following periods of heavy rainfall, WwTWs discharges, and agricultural runoff. The Humber Region has protected sites for water quality classified under the WFD. However, consultation with the EA indicates failures of WFD standards in recent years, and identifies storm foul sewer discharges and diffuse pollution from agriculture as ongoing stressors. As a result, the upper, middle, and lower Humber is considered to have 'moderate' ecological status, indicating it requires improvement⁶⁷.
- 5.3.4 Natural England's Supplementary Advice for the Humber Estuary SAC and Ramsar highlights a need to maintain or restore water quality to levels that support estuarine habitat functioning and avoid excessive nutrient enrichment. The Advice also identifies targets relating to nutrient concentrations, dissolved oxygen levels, and contaminant levels required to support the designated features, including benthic communities and intertidal habitats.

⁶⁴ Yorkshire Marine Nature Partnership. Nd. Humber Estuary SPA. Available at: <https://yorkshiremarinenaturepartnership.org.uk/manage/marine-protected-areas/humber-estuary-spa/> [Date accessed: 04/12/25]

⁶⁵ Natural England (2014), Site Improvement Plan: Humber Estuary (SIP108). Available at <https://publications.naturalengland.org.uk/publication/5427891407945728> [Date accessed: 09/12/25].

⁶⁶ Cave, R. R., Andrews, J. E., Jickells, T. and Coombes, E. G. (2005) A review of sediment contamination by trace metals in the Humber catchment and estuary, and the implications for future estuary water quality. *Estuarine, Coastal and Shelf Science*, 62 (3). pp. 547-557. ISSN 1096-0015

⁶⁷ Environment Agency (2025), Environmental Capacity in Industrial Clusters Project, Executive Summary (July 2025). Available at <https://www.gov.uk/government/publications/environmental-capacity-for-industrial-clusters-project-summary> [Date accessed: 04/11/25].

- 5.3.5 The outputs of the Stage 2 WCS (2025)⁶⁸ and associated water quality modelling have been used to inform this AA. The WCS was undertaken through consultation with the statutory water suppliers, the EA and neighbouring LPAs.
- 5.3.6 Increased growth can lead to a deterioration of water quality at water-sensitive European sites through either polluted surface water run off or through increased discharges from WwTWs. Under the WFD, a watercourse is not allowed to deteriorate from its current WFD classification (either as an overall watercourse or for individual elements assessed).
- 5.3.7 Effluent discharge to the water environment is controlled through an environmental permitting system which is administered by the EA. The level of discharge is determined by the EA through the issue of Environmental Permits (EPs). These ensure the receiving watercourse is not prevented from meeting its environmental objectives under the WFD, with specific regard to the physico-chemical status element of the WFD classification.
- 5.3.8 To predict water quality at European sites, detailed water quality modelling was undertaken as part of the WCS using the EA's SIMCAT model⁶⁹. This was applied to watercourses adjacent to, or as close as possible to, European sites with hydrological connectivity.
- 5.3.9 Using the Local Plan development trajectory and the growth inputs supplied for the WCS, two scenarios were assessed: the Local Plan-only, and Local Plan in combination with neighbouring local authority forecast growth scenario sharing the relevant WwTWs catchments. This ensured modelling captured the total loading that could reach the Humber Estuary SAC and Ramsar.
- 5.3.10 The model examined three physico-chemical quality elements (Biochemical Oxygen Demand, Ammonia, and Phosphate) in the upstream waterbodies and tributaries that drain into the Humber Estuary. If the model indicated a change in water quality of 10% or more, or a decrease in the WFD class, the impact on water quality was deemed significant.
- 5.3.11 The Stage 2 WCS modelling indicates that, if upstream water quality improves, planned growth would not stop the affected waterbodies from reaching WFD good ecological status in the future. A significant deterioration is, however, predicted through the water quality modelling at several WwTWs as a result of Local Plan growth. Yet, the WCS demonstrated that this could be prevented by improvements in treatment processes to Technical Achievable Limits (TAL) at WwTWs. Modelling indicates that growth at Dunchurch WwTW has the potential to cause a deterioration in WFD class, however there is no growth proposed at this WwTW in the final Local Plan growth scenario.
- 5.3.12 Where a WwTW is shared with a neighbouring authority, the WCS notes that coordination of growth plans in collaboration with STW is essential to ensure that infrastructure is in place prior to development to prevent a breach of environmental permits.
- 5.3.13 Whilst the WCS does not model the estuarine waters directly, the results indicate no significant deterioration in any river system draining to the Humber Estuary. Given the high dilution and dispersion capacity of the estuarine environment, and the absence of any upstream deterioration, the modelling indicates that no significant adverse changes to water quality would occur at the Humber Estuary SAC.

⁶⁸ JBA Consulting. Rugby Borough Council Water Cycle Study Stage 2 (2025).

⁶⁹ SIMCAT model has been developed by the Environment Agency. Further details on modelling are provided in the JBA Phase 2 WCS.

- 5.3.14 The policies set out in **Box 1** and **Box 2** will safeguard water quality associated with discharges from new development set out in the Local Plan.
- 5.3.15 Taking into consideration the protection that Local Plan policies set out in **Box 1** and **Box 2** give to water quality, outputs of the water quality modelling, and the location of allocations, it can be concluded that there will be no adverse impact on site integrity (AIOSI) as a result of the Local Plan either alone or in-combination on the Humber Estuary SAC and Ramsar.

5.4 Severn Estuary SAC and Ramsar

- 5.4.1 As set out in **Section 3.5**, the Severn Estuary SAC and Ramsar is located between Wales and England with extensive intertidal mudflats and sandflats, rocky platforms and islands⁷⁰. The Severn Estuary SAC and Ramsar hosts estuaries, mudflats and sandflats not covered by seawater at low tide, Atlantic salt meadows, sandbanks covered by sea water, and reefs. The site also supports Sea Lamprey (*Petromyzon marinus*), River Lamprey (*Lampetra fluviatilis*) and Twaite Shad (*Alosa fallax*).
- 5.4.2 Similar to the Humber Estuary designations, migratory species of fish for which the Severn Estuary SAC and Ramsar sites have been designated have the potential to use watercourses which are hydrologically linked to the Plan area for parts of their lifecycle, notably spawning. A change in the quality of water in these upstream spawning locations has the potential to adversely impact these qualifying features.
- 5.4.3 As set out in **paragraph 5.3.11**, water quality modelling undertaken as part of the Stage 2 WCS indicates that growth alone will not prevent good ecological status being reached in the future should improvements in upstream water quality be made.
- 5.4.4 Whilst the WCS does not model the estuarine waters directly, the results indicate no significant deterioration in any river system draining to the Severn Estuary. Given the high dilution and dispersion capacity of the estuarine environment, and the absence of any upstream deterioration, the modelling indicates that no significant adverse changes to water quality would occur at the Severn Estuary SAC.
- 5.4.5 The policies set out in **Box 1** and **Box 2** will safeguard water quality associated with discharges from new development set out in the Local Plan.

5.5 Conclusion

- 5.5.1 Taking into consideration the protection that Local Plan policies set out in **Box 1** and **Box 2** give to water quality, outputs of the water quality modelling, and the location of allocations, it can be concluded that there will be no AIOSI as a result of the Local Plan either alone or in-combination on the Severn Estuary SAC and Ramsar.

⁷⁰ UK Government. Nd. Severn Estuary SAC and SPA. Available at:
https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://assets.publishing.service.gov.uk/media/5dc1525ded915d1cfe538e44/Severn_Estuary_SAC_and_SPA_Factsheet.pdf&ved=2ahUKEwju_b2NubKGAXVJQUEAHS8sB0YQFn_oECBIQAQ&usq=AOvVaw1C6EHSU86RzAz-fz2HUmWY [Date accessed: 04/12/25]

6 Recreational Pressure Appropriate Assessment

6.1 Introduction

6.1.1 The following chapter of the AA focuses on assessing the ecological impacts of recreational pressure on the qualifying features of Ensor's Pool SAC as set out in **Section 3.6** due to growth associated with the Local Plan alone and in-combination.

6.1.2 The HRA screening process (**Chapter 4**) concluded that the following policies have the potential to result in LSEs on this SAC as a result of recreation impact pathways:

- Policy S2 – Strategy for homes;
- Policy S3 – Strategy for employment land;
- Policy S4 – Sites for Gypsies and Travellers;
- Policy S6 – Residential allocations;
- Policy S7 – Employment allocations;
- Policy S8 – South West Rugby;
- Policy S9 – South West Rugby spine road network; and
- Policy C1 – Rugby town centre.

6.2 Baseline Information

Introduction

6.2.1 As noted in **Section 3.6**, increased recreational pressure at European sites can result in damage to habitats and changes in animal behaviour. This can be caused by erosion and compaction, troubling of grazing stock, spreading of invasive species, dog fouling, and tree climbing among other recreational impacts. Typically, disturbance of habitat and species is the unintentional consequence of people's presence which can impact distribution of habitat types and breeding success and survival. Increased development has the potential to increase recreational pressure upon European sites which are accessible to the public.

Ensor's Pool SAC

6.2.2 Ensor's Pool SAC lies within the Ensor's Pool Nature Reserve and is formed in an abandoned clay pit. It is 3.5ha in size with a perimeter of approximately 770m with an average depth of 8m and is fed by groundwater. The site was designated a SAC in 2001 in recognition of its internationally important population of native White-Clawed Crayfish.

6.2.3 As set out in **Section 3.6**, recent surveys of the site have concluded that the once abundant population have disappeared, with cause likely attributed to the spread of 'Crayfish Plague'⁷¹. It was reported to the EA and Natural England in 2005 that one Signal Crayfish (*Paci fastacus leniusculus*), an invasive species from North America, was released into Ensor's Pool. The Signal Crayfish may have been carrying Crayfish plague, however there was no observed mortality until the time of survey. Crayfish plague can also be transferred on fishing and other equipment. Although angling is prohibited on Ensor's Pool, unauthorised fishing does take place.

6.2.4 Whilst there are public footpaths that run through the Nature Reserve, recreational impacts are not identified as a threat / pressure at the SAC within the SIP⁷² or Natural England's supplementary advice, yet recreational impacts have been considered through this AA given the proximity of Ensor's Pool SAC to the Plan area (4km) and the potential for unauthorised angling.

6.3 Mitigation

6.3.1 Policies within the Local Plan including Policy W2: 'Open Space and Sports Provision' require new development to deliver sufficient open space to support growth. Additionally, Policy EN1 (Biodiversity and Geodiversity Protection) and Policy EN4 (Biodiversity Net Gain) secure the creation and protection of naturalistic habitats that function as alternative destinations for walking and nature-based recreation; Policy EN5 (Canopy Cover) and Policy D3 (Landscaping) set out the requirements for new development in the context of well-designed, high-quality green infrastructure; and Policy W1 (Protection of Community Facilities) safeguards existing parks, open spaces and recreational facilities from loss. Collectively, these policies increase the availability, quality, and accessibility of open space across the Plan area.

6.3.2 The Local Plan also sets out provisions for the creation of two new Country Parks in the Plan area. The largest allocation in the Local Plan is for expansion 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 include the delivery of a 75ha expansion to Coombe Abbey Country Park and a new walking and cycling route to Coventry. In addition, allocation South West Rugby employment phase 2 (Site 17) will include the creation of a wooded 8.6ha publicly accessible country park alongside Cawston Spinnery to include footpaths linking to existing routes and providing east-west connectivity along the northern site boundary. These new Country Parks will increase recreational provision in Rugby for new residents.

⁷¹ David Rogers Associated (2015) White-clawed crayfish survey for Ensor's Pool SSSI/SAC (Warwickshire). Natural England Publication IPENS065. Available at: <https://publications.naturalengland.org.uk/publication/6577286383927296> [Date accessed: 04/12/25].

⁷² Natural England and other parties (2015) White-clawed crayfish survey for Ensor's Pool SSSI/SAC (Warwickshire). Improvement Programme for England's Natura 2000 Sites (IPENS) – Planning for the Future IPENS065. Available at: <https://publications.naturalengland.org.uk/publication/5756899955834880> [Date accessed: 09/12/25]

6.4 Appropriate Assessment

- 6.4.1 Ensor's Pool SAC lies 4km from the Plan area, on the outskirts of Nuneaton, and does not comprise a key recreational destination for residents from Rugby. In addition, Natural England does not identify recreational pressure as a key threat at the SAC⁷³. A review of allocations in the Local Plan found that at its closest point, the closest allocation is located approximately 7.6km from the SAC (Land North of the B4109, Wolvey, site number 309, see **Appendix C, Figure C.1**).
- 6.4.2 A review of available recreational resources in Rugby identified multiple alternative recreational options located within closer proximity to site allocations within the Plan area. This review found that Swift Valley Country Park is located adjacent to the northern edge of Rugby town, between the Eden Park residential area and the Swift Valley employment arena. This country park is managed as a reserve by Warwickshire Wildlife Trust. It comprises 24ha of wetland, grassland and a disused canal with a fully accessible circular walk, benches and significant wildlife features. A total of 22 residential allocations fall within 5km of this Country Park. Newbold Quarry Nature Reserve is located approximately 1.4km to the west of Swift Valley and offers woodland and open water walking trails. Caldecott Park is located approximately 1.4km southeast of Newbold Quarry Nature Reserve and is directly adjacent to residential allocation '353 – Town Hall, Rugby'. A total of 23 residential allocations fall within a 5km radius of Caldecott Park. The variety of facilities provided at Caldecott Park, which include tennis courts, bowling green, children's play areas, bandstand, café, public toilets, lawns and flowerbeds, and its central location are likely to draw local visitors. Whitehall Recreation Ground is located approximately 1km to the southeast of Caldecott Park and offers open green space, children's play area and skate park, making it suitable for children, youth, and casual recreation. Furthermore, the Council maintains a large number of smaller recreation grounds, open spaces, and amenity greens in residential areas; a selection of which are seen on the map displayed in **Figure 6.1**. Collectively, these provide extensive distributed recreational capacity and alternative provision to Ensor's Pool SAC. Alternative recreation sites alongside proposed residential allocations are displayed in **Figure 6.1**.

⁷³ Natural England (2014), Ensor's Pool SAC Site Improvement plan. Available at <https://publications.naturalengland.org.uk/publication/5364843502632960> [Date accessed: 05/12/25].

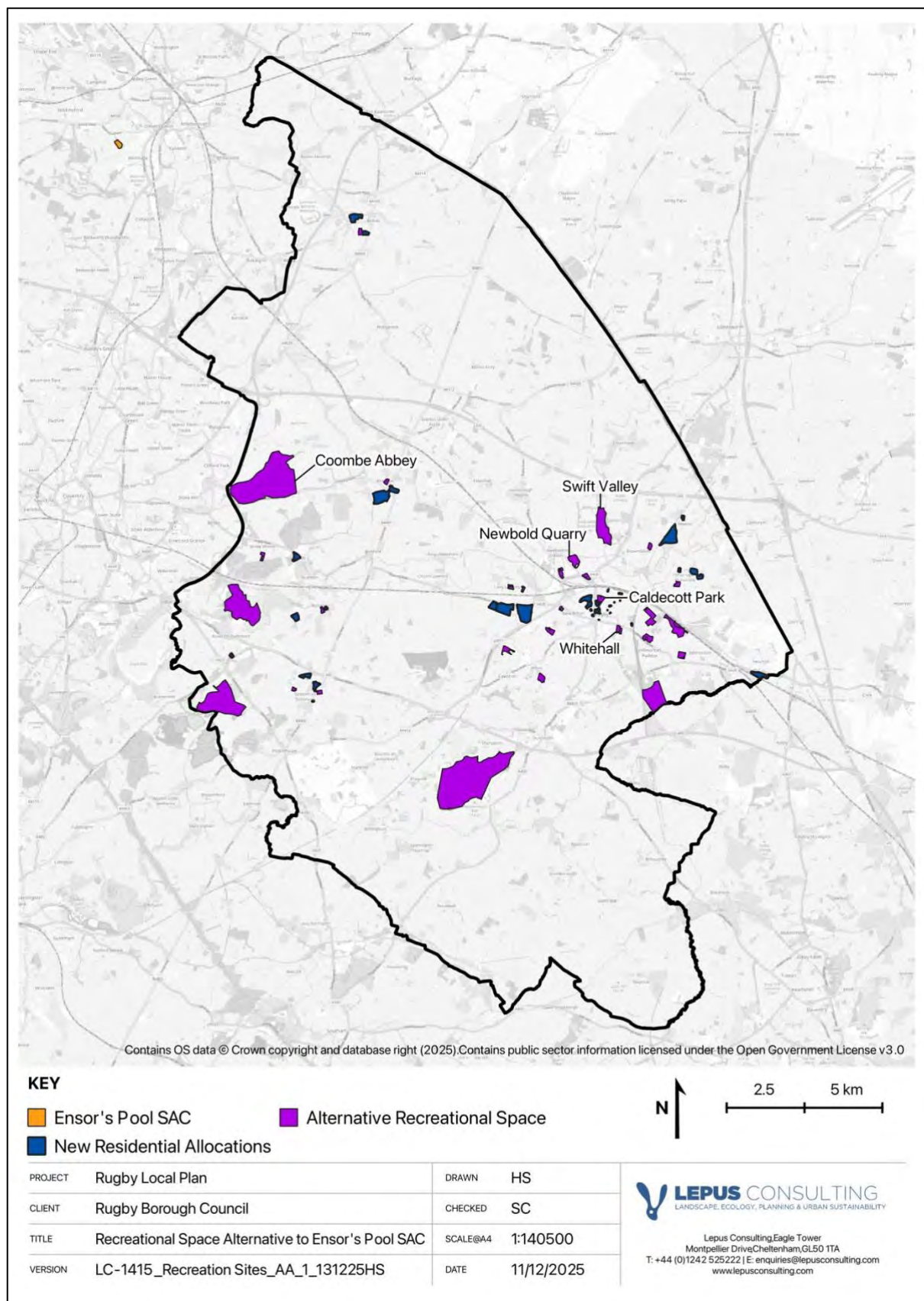


Figure 6.1: Alternative sites to Ensor's Pool SAC for informal recreation

- 6.4.3 Given the distance between the SAC and the nearest residential allocation, the availability of alternative recreational spaces across the Plan area, the lack of recreational pressures identified in the SIP for the SAC 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 AIOSI from recreational impacts at Ensor's Pool SAC either alone or in-combination.
- 6.4.4 Fishing is strictly prohibited at Ensor's Pool due to the site's conservation status (see **paragraph 3.6.5**). Despite this, community groups and local news sources report occasional instances of unauthorised angling.
- 6.4.5 Angler behaviour studies⁷⁴ and EA surveys⁷⁵ indicate that anglers prefer managed, stocked, legally accessible waters 'closer to home' rather than sites where angling is prohibited or subject to enforcement, and are 'highly supportive' of minimising illegal fishing with penalties and suspensions. Managed fisheries offer known catch potential, maintained access, and club supervision, significantly reducing the likelihood of anglers choosing illegal locations. A review of legal fishing areas within and around the Plan area found multiple managed fisheries and lawful alternatives, including Draycote Reservoir (a permit-run trout and predator fishery), Ryton Pools (angling association waters), club-controlled stretches of the Oxford Canal (permits via Canal & River Trust or local clubs), Makins Fishery (24hr passes) and a number of commercial day-ticket fisheries (Barby Mill Pools, Toft Lakes, Willow Lakes, Meadowlands Fishery, Spring Pools, Home Farm, Old Oak Farm, Hawkesbury Farm and Mineral Lakes). These waters are actively managed with clear permit / membership systems, providing legitimate, high-capacity options in closer proximity to the Plan area than Ensor's Pool (see **Figure 6.2**). These therefore reduce the incentive for illegal fishing at Ensor's Pool, and limit the potential for adverse effects on its qualifying habitats. It can therefore be concluded that the Local Plan will have no AIOSI from illicit recreational impacts at Ensor's Pool SAC either alone or in-combination.

⁷⁴ Ryan, K.L., Syers, C., Holtom, K., Green, T., Lyle, J.M., Stark, K.E. and Tracey, S.R. (2025). Recreational fishers' attitudes to fisheries management and compliance. *Marine Policy*, 172, p.106483. Available at: <https://www.sciencedirect.com/science/article/pii/S0308597X24004834?via%3Dihub> [Date accessed: 09/12/25]

⁷⁵ Environment Agency (2018), A survey of freshwater angling in England, Phase 2 report: Non-market values associated with angling. Available at https://assets.publishing.service.gov.uk/media/6176bcfd8fa8f52983494969/A_survey_of_freshwater_angling_in_England_-_phase_2_report.pdf?utm_source=chatgpt.com [Date accessed: 09/12/25].

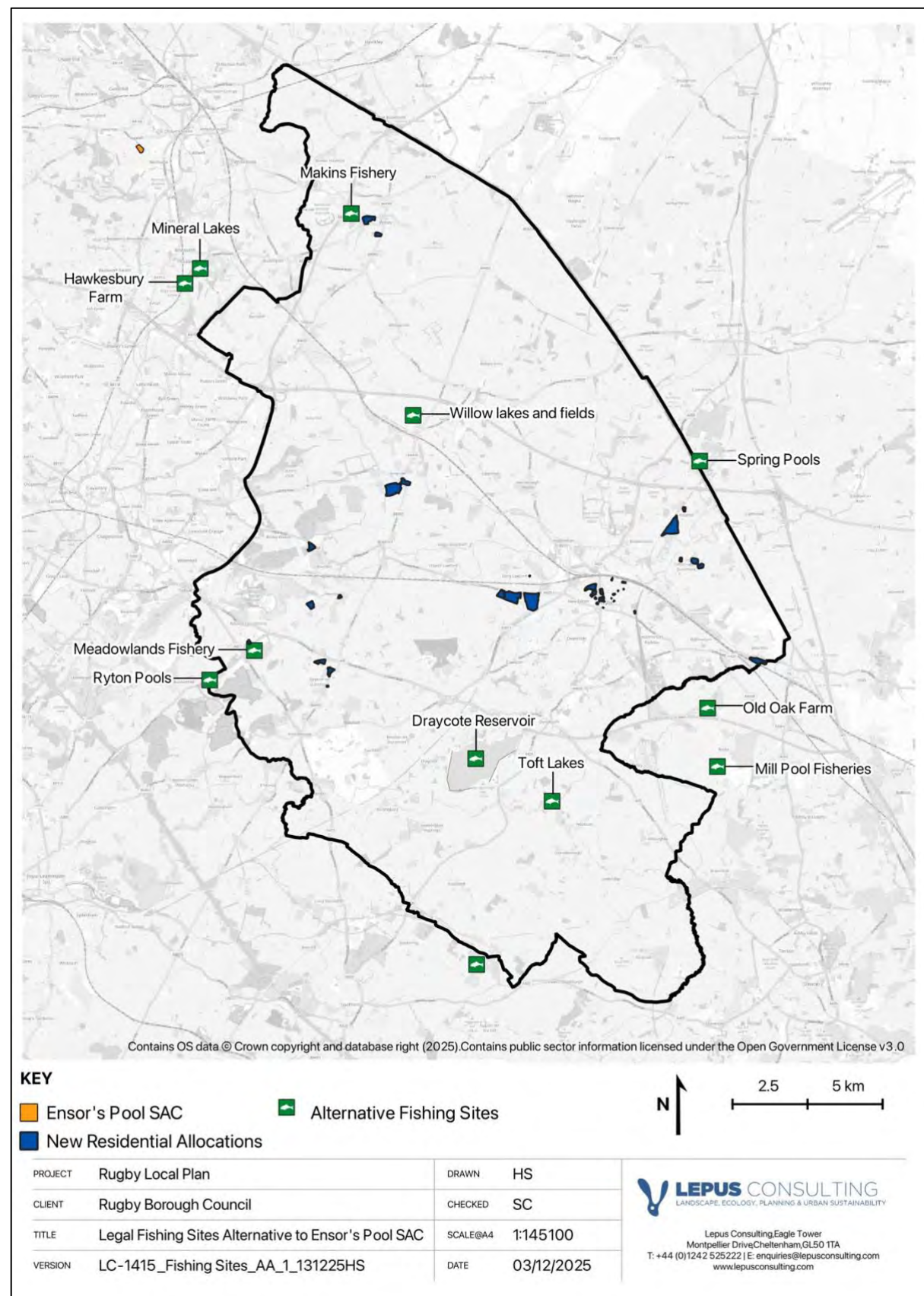


Figure 6.2: Alternative sites to Ensor's Pool SAC for legal angling

6.5 Conclusion

- 6.5.1 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 AIOSI due to recreational pressures on Ensor's Pool SAC either alone or in-combination.

7 Next Steps

7.1 Summary

7.1.1 The Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment was therefore undertaken which identified a number of LSEs associated with the Local Plan. Taking no account of mitigation measures, the Local Plan has the potential to affect the following European sites:

- Ensor's Pool SAC;
- Humber Estuary SAC;
- Humber Estuary Ramsar;
- Severn Estuary SAC; and
- Severn Estuary Ramsar.

7.1.2 The HRA therefore progressed to the next stage of the HRA process: Appropriate Assessment. The following matters were explored in more detail:

- Impacts on water quality associated with increased levels of built development; and
- Impacts associated with increased recreational pressure, including illicit uses.

7.1.3 A range of potential threats and pressures that might be exacerbated by the Local Plan were identified through the assessment process. The Precautionary Principle has been used in circumstances where likely effects were considered to be uncertain. The protective policies set out in the Local Plan, alongside existing protection measures in existing high level strategic and planning policy frameworks and existing recreational resources within the Plan area have been factored into the assessment process.

7.1.4 Taking into consideration AIOSI at any European site, either alone or in-combination.

7.2 Next steps

7.2.1 The purpose of this report is to inform the HRA of the Local Plan using best available information.

7.2.2 Rugby Borough Council, as the Competent Authority, has responsibility to make the Integrity Test, which can be undertaken in light of the conclusions set out in this report.

7.2.3 This report will be submitted to Natural England, the statutory nature conservation body, for formal consultation. The Council must 'have regard' to Natural England's representations under the provisions of the Habitats Regulations prior to making a final decision as to whether they will 'adopt' the conclusions set out within this report as their own.

Appendix A: In-Combination Assessment

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
Blaby Local Plan ¹	<p>The Local Plan (Core Strategy) was adopted in February 2013. This sits alongside the Local Plan Delivery DPD adopted in February 2019.</p> <p>The Council consulted on the New Local Plan Options (Issues and Options - Regulation 18) between January and March 2021. The Council was aiming to produce the Regulation 19 version of the Local Plan by July 2025; however, this has been extended to April 2026 following the impending completion of a Transport Study.</p>	<p>Housing requirements form part of the New Local Plan options consultation and range from 339 to 632 dwellings per year.</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>
Cherwell Local Plan ²	<p>The Cherwell Local Plan 2015 was adopted July 2015 (updated 2016 and reviewed in 2023).</p> <p>Work on the Local Plan Review 2040 has commenced which will replace the adopted Local Plan 2015 and the 'saved' policies in the Cherwell Local Plan (1996).</p>	<p>This Local Plan review allows for the provision of the required 911 homes per annum from 2020-2042, alongside additional homes, for a total of 24,587 homes.</p> <p>The Plan sets out employment development for 173.12ha, with a net developable area of 97.5ha.</p> <p>A draft HRA4 report was completed in November 2024 which concluded that the Local Plan review would not have an adverse effect on the integrity of</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making</p>

¹ Blaby District Council. New Local Plan. Available at: <https://www.blaby.gov.uk/planning-and-building/local-plan/new-local-plan/> [Date accessed 11/12/2025].

² Cherwell District Council. Planning for Cherwell – Local Plan Review. Available at: <https://www.cherwell.gov.uk/info/83/local-plans/729/planning-for-cherwell---local-plan-review> [Date accessed 11/12/2025].

⁴ Cherwell District Council. DRAFT Report to Inform Habitats Regulations Assessment, Cherwell Local Plan Review 2042 (2024). Available at https://cherwell.citizenspace.com/planning-policy/cherwell-local-plan-review-2042/user_uploads/habitats-regulation-assessment-november-2024.pdf [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
	The Cherwell Local Plan Review 2040 Proposed Submission Document (Regulation 19) ³ underwent consultation from 19 December 2024 – 25 February 2025.	any European sites either alone or in-combination with other plans or projects.	process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.
Coventry Local Plan ⁵	Coventry City Council adopted its Local Plan to 2031 and Area Action Plan in December 2017, which is now under review, with the Emerging Local Plan extending to 2041. The Regulation 19 consultation took place from 20th January to 3rd March 2025. The Local Plan was submitted to the secretary of state on 9th September 2025 for independent examination by the Planning Inspectorate.	The Local Plan sets out the provision of a minimum of 29,100 additional homes and 60ha of employment land. A HRA Regulation 19 Consultation Screening report was conducted in August 2024. The HRA concluded no adverse effects on the integrity of any European sites alone or in-combination as a result of the plan and its proposed development.	Yes. This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.
Harborough Local Plan ⁶	The Council adopted the Local Plan 2011-2031 in 2019.	An HRA ⁷ screening report supported the adoption of the Local Plan 2011-2031. The HRA concluded no	Yes. This plan will trigger change or development close to the Plan area. There

³ Cherwell District Council (December 2024) Cherwell Local Plan Review 2042: Proposed Submission Document (Regulation 19). Available at: <https://www.cherwell.gov.uk/local-plan-review-2042-submission> [Date accessed 24/11/25].

⁵ Coventry City Council. About the Local Plan Review. Available at: <https://www.coventry.gov.uk/planning-policy/local-plan-review> [Date accessed 11/12/2025].

⁶ Harborough District Council. Harborough Local Plan 2011-2031. Available at: https://www.harborough.gov.uk/info/20004/planning_strategy/220/harborough_local_plan_2011-2031 [Date accessed: 11/12/2025].

⁷ Enfusion (August 2024), Coventry City Council, Coventry Local Plan Review 2021 – 2041 Regulation 19 Consultation, Habitats Regulations Assessment (HRA) Screening Report. Available at <https://www.coventry.gov.uk/downloads/file/44127/habitats-regulations-assessment> [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
	An Issues and Options consultation ran from 16 January to 27 February 2019.	adverse effects on European sites either alone or in-combination as a result of the plan.	is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.
Hinckley and Bosworth Local Plan ⁸	<p>The Council is in the process of reviewing and updating the Local Plan. The new Local Plan will set out land allocations and planning policies for the period 2024 – 2045.</p> <p>A Regulation 18 consultation ran from 31 July to 27 September 2024 in light of emerging evidence on the spatial strategy.</p> <p>A new Regulation 18 consultation is in process running from 17th October to 28th November 2025 relating to new and / or updated policies and site allocations.</p>	<p>The consultation draft Local Plan (Regulation 18) sets out the provision of 13,862 dwellings and 194.68ha of employment land during the period 2020-2041.</p> <p>An HRA9 was conducted in support of the Scope, Issues and Options consultation (2018) and the supporting New Directions for Growth Consultation paper (2019). The HRA concluded that there was potential for LSEs at European sites, and an AA was required.</p>	<p>Yes.</p> <p>There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>

⁸ Hinckley and Bosworth Borough Council. Local Plan Review 2020-2041. Available at https://www.hinckley-bosworth.gov.uk/info/200398/Local_plan_review_2024_to_2045 [Date accessed: 11/12/2025].

⁹ JBA Consulting (September 2020) Hinckley & Bosworth Local Plan – Scope, Issues and Options. Shadow Habitat Regulations Assessment Screening Report Draft. Available at https://www.hinckley-bosworth.gov.uk/downloads/file/7104/shadow_habitat_regulations_assessment_screening_report_sept_2020 [Date accessed: 11/12/2025].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
Leicester Local Plan ¹⁰	<p>The Local Plan 2020-2036¹¹ Regulation 19 consultation ran from 16 January 2023 to 27 February 2023.</p> <p>The Main Modifications consultation was completed on 29th July 2025.</p>	<p>The Local Plan sets out a target for the provision of 20,730 dwellings over the Plan period (1,296 dwellings annually). It identifies the following amount of new employment development within the Plan area:</p> <ul style="list-style-type: none"> • 46,000 sqm offices • 67ha for industry and small-scale storage and distribution <p>An HRA12 was conducted in support of the Local Plan. It concluded no adverse impacts on the integrity of European sites alone or in-combination as a result of the Local Plan. Therefore, a full AA is not required.</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>
North Warwickshire Local Plan ¹³	<p>The Local Plan was adopted in September 2021.</p>	<p>The Local Plan sets out the delivery of 9,598 dwellings (479 dwellings per year) to 2033. If the identified number of dwellings are delivered, approximately 100ha of employment land will be required by 2033.</p> <p>An HRA14 was conducted in support of the Local Plan in 2021. It concluded no adverse impacts on</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar and Humber Estuary SAC and</p>

¹⁰ Leicester City Council. Leicester Local Plan – Publication Draft 2020-2036 Consultation (Ref version). Available at: <https://consultations.leicester.gov.uk/sec/9bbe1eaa/> [Date accessed: 10/12/25].

¹¹ Leicester City Council (January 2023) Leicester Local Plan 2020 to 2036. Available at <https://www.leicester.gov.uk/media/xexe0hll/local-plan-r19-doc-11-01-23-1.pdf> [Date accessed 14/11/25].

¹² Leicester City Council (September 2022) Local Plan Habitats Regulations Appropriate Assessment Screening Report. Available at <https://www.leicester.gov.uk/media/yiqe4rl4/habitats-regulation-assessment-hra.pdf> [Date accessed 24/11/25].

¹³ North Warwickshire Borough Council. Local Plan for North Warwickshire. Available at <https://www.northwarks.gov.uk/forward-planning/local-plan-north-warwickshire> [Date accessed 11/12/2025].

¹⁴ LUC (September 2021), North Warwickshire Council, Strategic Environmental Assessment of the North Warwickshire Local Plan (incorporating the Habitats Regulations Assessment) (Adoption Statement 2021). Available at <https://www.northwarks.gov.uk/downloads/file/98/strategic-environmental-assessment-of-the-north-warwickshire-local-plan-adoption-statement-including-hra-2021-> [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
		the integrity of European sites alone or in-combination as a result of the Local Plan.	Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.
Nuneaton and Bedworth Local Plan ¹⁵	The Borough Plan Review (2021-2039) was submitted for examination in February 2024. The Borough Plan Review is scheduled to go to Full Council, with a recommendation for adoption, on 10th December 2025.	The Local Plan sets out the delivery of a minimum of 9,810 homes (545 dwellings per annum), 66.45ha of employment land for local industrial and warehousing development, 2ha of employment land for office space and 19.4ha of land for strategic B8 warehousing and distribution development by 2039. An HRA16 was conducted in support of the Local Plan. It concluded that the Local Plan will not result in adverse effects on the integrity of European sites alone or in-combination.	Yes. This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar and Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.

¹⁵ Nuneaton and Bedworth Borough Council. Borough Plan. Available at <https://www.nuneatonandbedworth.gov.uk/adopted-borough-plan/borough-plan-1> [Date accessed 24/11/25].

¹⁶ AECOM (September 2023) Habitats Regulations Assessment of the Nuneaton and Bedworth Local Plan Review. Available at: <https://www.nuneatonandbedworth.gov.uk/downloads/file/1121/cd8-habitat-regulations-assessment-2023-> [Date accessed: 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
Oadby and Wigston Local Plan ¹⁷	<p>The Council is in the process of preparing a new Local Plan. The Regulation 19 consultation ran from 10 January to 21 February 2025.</p> <p>The Local Plan is now being prepared following consultation responses, prior to its final submission for adoption.</p>	<p>The Local Plan sets out the provision of 6,486 dwellings (382 dwellings per annum) over the Plan period to 2041. The Local Plan does not set out any further employment land, with 5ha of land designated yet to be developed.</p> <p>An HRA18 was conducted in support of the Local Plan. It concluded no adverse impacts on the integrity of any European sites alone or in-combination.</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>
Solihull Local Plan ¹⁹	<p>The Local Plan was adopted by the Council on 3rd December 2013.</p> <p>In May 2021, the Council submitted the Local Plan Review for examination. The council began work on preparing a new Local Plan²⁰ in</p>	<p>The adopted local plan allocates 3,960 net additional homes to ensure sufficient housing land supply to deliver 11,000 additional homes in the period 2006-2028.</p> <p>A stage 1 screening HRA²¹ was developed in 2018 to support the Local Plan review, which concluded</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC</p>

¹⁷ Oadby and Wigston Borough Council. New Oadby and Wigston Local Plan. Available at: https://www.oadby-wigston.gov.uk/pages/new_oadby_and_wigston_local_plan [Date accessed: 24/11/25].

¹⁸ LUC (November 2024) Oadby and Wigston Local Plan: Pre-Submission Draft Habitats Regulations Assessment Report. Available at: https://www.oadby-wigston.gov.uk/files/documents/regulation_19_habitat_regulations_assessment_report_november_2024/Regulation%2019%20Habitat%20Regulations%20Assessment%20Report%20-%20November%202024.pdf [Date accessed 24/11/25].

¹⁹ Solihull Metropolitan Borough Council (2013) Solihull Local Plan – Shaping a Sustainable Future. Available at: <https://www.solihull.gov.uk/Planning-and-building-control/Solihull-local-plan> [Date accessed 24/11/24].

²⁰ Solihull Metropolitan Borough Council (2025) Emerging Local Plan. Available at <https://www.solihull.gov.uk/planning-and-building-control/emerging-local-plan> [Date accessed 24/11/25].

²¹ Middlemarch Environmental (April 2018), Solihull Metropolitan Borough Local Plan Review, Habitats Regulations Assessment Stage 1: Screening. Available at https://www.solihull.gov.uk/sites/default/files/migrated/Planning_LPR_Habitat-Regulations-Assessment-Screening-Report.pdf [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
	<p>November 2024, expected to cover the period 2026 – 2043.</p> <p>A call for sites exercise was undertaken from November 2024 to February 2025.</p> <p>Work is being undertaken to update the evidence base to support the new plan and a draft plan is expected to be published by the end of 2025.</p>	<p>that none of the policies and proposals of the Solihull Local Plan review will result in significant effect on any screened in European sites.</p>	<p>and Ramsar and Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>
Stratford-on-Avon Local Plan ²²	<p>The Core Strategy was adopted by the Council in 2016. In January 2021, the Council commenced a review of its Core Strategy. The review concluded that the Core Strategy remains up-to-date.</p> <p>The Council is undertaking a review and is working with Warwick District Council on the South Warwickshire Local Plan²³. A Preferred Options consultation ran from 10 January to 7 March 2025.</p> <p>The councils continue to prepare the pre-submission draft of the Local Plan.</p>	<p>The South Warwickshire Local Plan sets out the provision of a minimum of 1,679 dwellings per annum with flexibility to accommodate up to 2,188 dwellings per annum until 2050.</p> <p>An HRA²⁴ was conducted in support of the Local Plan. The HRA screens in the Humber Estuary and Severn Estuary SACs and Ramsar sites for AA at Regulation 19.</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar and Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>

²² Stratford-on-Avon District Council. Core Strategy. Available at <https://www.stratford.gov.uk/planning-building/core-strategy.cfm> [Date accessed 24/11/25].

²³ Warwick District Council & Stratford-on-Avon District Council. Available at: <https://www.southwarwickshire.org.uk/swlp/> [Date accessed: 27/01/25].

²⁴ Lepus Consulting (November 2024) Habitats Regulations Assessment of the South Warwickshire Local Plan Regulation 18 Preferred Options. Available at <https://www.southwarwickshire.org.uk/doc/213182/name/LC%201228%20SWLP%20Preferred%20Options%20HRA%203%20201124SC.pdf> [Date accessed: 27/01/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
Tamworth Local Plan ²⁵	<p>The Local Plan 2006-2031 was adopted in February 2016.</p> <p>The Council is currently preparing a new Local Plan 2022-2043. The Council is currently at the evidence gathering stage and has conducted an Issues and Options consultation.</p>	<p>The Local Plan 2006-2031 sets out the provision of a minimum of 4,425 dwellings (177 dwellings per annum) by 2031.</p> <p>An HRA was not available online at the time of writing.</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>
Warwick District Council Local Plan ²⁶	<p>The Local Plan 2011-2029 was adopted in September 2017.</p> <p>Stratford-on-Avon and Warwick District Councils are currently working together to prepare a new local plan for South Warwickshire²⁷. The Councils are currently at the Preferred Options stage. The Preferred Options consultation ran from 10th January to 7th March 2025.</p>	<p>The South Warwickshire Local Plan sets out the provision of a minimum of 1,679 dwellings per annum with flexibility to accommodate up to 2,188 dwellings per annum until 2050.</p> <p>An HRA²⁸ was conducted in support of the Local Plan. The HRA screens in the Humber Estuary and Severn Estuary SACs and Ramsar sites for AA at Regulation 19.</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar and Humber Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be</p>

²⁵ Tamworth Borough Council. Local plans. Available at: <https://www.tamworth.gov.uk/planning/local-plans> [Date accessed 24/11/25].

²⁶ Warwick District Council. Warwick District Local Plan 2011-2029. Available at: https://www.warwickdc.gov.uk/info/20410/local_plan [Date accessed 24/11/25].

²⁷ Warwick District Council & Stratford-on-Avon District Council. Available at: <https://www.southwarwickshire.org.uk/swlp/> [Date accessed 24/11/25].

²⁸ Lepus Consulting (November 2024) Habitats Regulations Assessment of the South Warwickshire Local Plan Regulation 18 Preferred Options. Available at: <https://www.southwarwickshire.org.uk/doc/213182/name/LC%201228%20SWLP%20Preferred%20Options%20HRA%203%20201124SC.pdf> [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
	The councils continue to prepare the pre-submission draft of the Local Plan.		prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.
West Northamptonshire Local Plan ²⁹	<p>The Council is currently preparing a new Local Plan to guide development up to 2041. Consultation on a Regulation 18 Draft Plan ran between April and June 2024.</p> <p>A further consultation on a Regulation 18 Draft Plan will take place in the winter 2025/2026, with the intention to submit the plan for examination by the end of 2026.</p>	<p>The Local Plan sets out the provision of 39,150 new dwellings over the Plan period.</p> <p>An HRA30 was conducted in support of the Local Plan. The screening report concluded potential LSEs at Upper Nene Valley Gravel Pits SPA and Ramsar and required a full AA.</p>	<p>Yes.</p> <p>This plan will trigger change or development close to the Plan area. There is potential for in-combination hydrology LSEs on functionally linked watercourses associated with the Severn Estuary SAC and Ramsar. The in-combination impact of these will be taken into consideration through the Stage 2 WCS which will be prepared as part of the plan-making process. This will comprise water quality modelling which will take into consideration housing numbers proposed in both the Plan area and neighbouring LPA areas where they feed into the same WwTWs.</p>
Warwickshire Local Transport Plan ³¹ (LTP4)	Adopted July 2023	LTP4 sets out measures to achieve NetZero including the promotion of active travel and sustainable forms of transport.	The combined impact of LTP4 strategies, in-combination with SWLP growth, on traffic related air quality will be considered further in the HRA process.

²⁹ West Northamptonshire Council. New Local Plan for West Northamptonshire. Available at <https://www.westnorthants.gov.uk/planning-policy/new-local-plan-west-northamptonshire> [Date accessed 24/11/25].

³⁰ Urban Edge Environmental Consulting (April 2024) Habitats Regulations Assessment for the West Northamptonshire Local Plan Screening Report for the Draft Local Plan. Available at: <https://www.westnorthants.gov.uk/planning-policy/new-local-plan-west-northamptonshire> [Date accessed 24/11/25].

³¹ Warwickshire County Council (2023) A New Local Transport Plan for Warwickshire (LTP4) . Available at: <https://www.warwickshire.gov.uk/localtransportplan> [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
Warwickshire Minerals Local Plan ³²	Adopted July 2022	This plan is a Development Plan Document which sets out the spatial strategy, vision, objectives and policies for guiding minerals development in the County until 2032. It was supported by an HRA ³³ which focused on Ensor's Pool SAC and the River Mease SAC. The HRA was updated in 2021 to incorporate suggested indicative thresholds around Ensor's Pool SAC and the Natural England River Mease Catchment Risk Zone that should be used to trigger a project level HRA for any opportunistic minerals planning applications outside of the seven Preferred Sites. It also considered migratory fish species related to the Humber SAC, SPA and Ramsar site.	Yes. This plan will trigger change or development adjacent to the Plan area. There is potential for in-combination hydrology LSEs.
Warwickshire Waste Core Strategy ³⁴	Adopted July 2013.	The Strategy sets out the Spatial Strategy, Vision, Objectives and Policies for managing waste for a 15-year plan period up to 2028. It also provides the framework for waste development management including implementation and monitoring. It was supported by an HRA ³⁵ which concluded no adverse impacts on site integrity.	Yes. This plan will trigger change or development adjacent to the Plan area. There is potential for in-combination air quality, hydrology and functionally linked land LSEs.

³² Warwickshire County Council (2022) Warwickshire Minerals Local Plan 2018 – 2032. Available at: <https://www.warwickshire.gov.uk/mineralslocalplan> [Date accessed 24/11/25].

³³ Warwickshire County Council (2021). Habitats Regulations Assessment. SCREENING DECISION AND APPROPRIATE ASSESSMENT UPDATED, September 2021. <https://www.warwickshire.gov.uk/mineral-waste-plans/minerals-development-framework/> Available at: [Date accessed 24/11/25].

³⁴ Warwickshire County Council (2013) Waste Core Strategy. Adopted Local Plan 2013-2028. Available at: <https://www.warwickshire.gov.uk/mineral-waste-plans/waste-development-framework/1> [Date accessed 24/11/25].

³⁵ Warwickshire County Council, Habitats Regulations Assessment – Screening Report for Minerals and Waste Development Frameworks. Available at <https://api.warwickshire.gov.uk/documents/WCCC-680-147> [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
Severn River Basin Management Plan (RBMP)	The Severn RBMP was updated in October 2022 ³⁶ .	The RBMP provides an overview of river basin planning in England and Wales for the Severn River Basin District. It includes objectives for each water body and a summary of the measures necessary to reach those objectives. The RBMP was supported by an HRA ³⁷ . This concluded that, at the strategic plan level, the RBMP is not likely to have any significant effects on any European sites, alone or in combination with other plans or projects. Given this conclusion, there was no requirement, at this strategic plan level, to progress to the next stage of the HRA (AA). The RBMP does not specify exactly where or how measures should be implemented, this will be determined at either a lower-tier plan or project level and this is taken into consideration in the HRA. The HRA also draws on detailed mitigation measures and procedures currently in place.	Yes. The in-combination impact of development on the achievement of aims in the RBMP will be considered in the HRA process.
Humber River Basin Management Plan (RBMP)	The Humber RBMP was updated in October 2022 ³⁸ .	The RBMP provides an overview of river basin planning in England for the Humber River Basin District. It includes objectives for each water body and a summary of the measures necessary to reach those objectives. The RBMP was supported by an	Yes. The in-combination impact of development on the achievement of aims in the RBMP will be considered in the HRA process.

³⁶ Environment Agency (2022) Severn River Basin Management Plan summary and cross border catchments. Available at : <https://www.gov.uk/government/publications/severn-river-basin-management-plan-summary-and-cross-border-catchments-england-and-wales/severn-river-basin-management-plan-summary-and-cross-border-catchments-england-and-wales> [Date accessed 24/11/25].

³⁷ Environment Agency (2022) River basin management plan for the Severn River Basin District Habitats Regulations Assessment. Available at: https://assets.publishing.service.gov.uk/media/635247738fa8f554c470abf5/Severn_river_basin_management_plan_2022_HRA.pdf [Date accessed 24/11/25].

³⁸ Environment Agency (2022) Humber river basin district management plan: updated 2022. Available at: <https://www.gov.uk/guidance/humber-river-basin-district-river-management-plan-updated-2022> [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
		HRA39. This concluded that, at the strategic plan level, the RBMP is not likely to have any significant effects on any European sites, alone or in combination with other plans or projects. Given this conclusion, there is no requirement, at this strategic plan level, to progress to the next stage of the HRA (AA). The RBMP does not specify exactly where or how measures should be implemented, this will be determined at either a lower-tier plan or project level and this is taken into consideration in the HRA. The HRA also draws on detailed mitigation measures and procedures currently in place.	
Severn Trent Water Resources Management Plan (WRMP) ⁴⁰ .	Severn Trent Water's WRMP was published as the final version on 11th April 2025. The latest plan covers the period between 2025 – 2085.	The draft WRMP describes a likely future supply / demand deficit of 244M/d by plan year 2040-2041 if no action is taken. It sets out the long-term strategy until 2085 to prepare for the future. The Plan proposes ongoing leakage reduction measures, water efficiency and metering activities. Some current EA abstraction licences will be capped to prevent WFD deterioration. It sets out a vision of 'no/low regret' solutions, particularly in response to the challenges of climate change on water demand and supply. The draft builds on previous goals to reduce unsustainable abstraction. Mainly focuses on water availability but considers water quality through design. Severn Trent Water will continue to restore	Yes. The outputs of the WRMP will be taken into consideration in the consideration of in-combination water impacts in the HRA process.

³⁹ Environment Agency (2022) River basin management plan for the Humber River Basin District Habitats Regulations Assessment. Available at: https://assets.publishing.service.gov.uk/media/63524462d3bf7f193d35a0f7/Humber_river_basin_management_plan_2022_HRA.pdf [Date accessed 24/11/25].

⁴⁰ Severn Trent Water (2024) Draft Water Resources Management Plan: Main Narrative. Available at: <https://www.severntrent.com/content/dam/dwrmp24-st/STdWRMP24-Main-Narrative.pdf> [Date accessed 24/11/25].

Plans and Policies	Plan status	Summary of housing/employment	Potential in-combination LSE
		<p>rivers to improve habitats and ecological resilience to low flows.</p> <p>The WRMP was supported by an HRA⁴¹. This concluded that the WRMP is likely to have a significant effect on the following screened in Local Plan European sites within the statutory 25-year planning period either alone (I) or in-combination (L):</p> <ul style="list-style-type: none"> • Cannock Chase SAC • Fens Pools SAC • Humber Estuary SAC and Ramsar • River Mease SAC • Severn Estuary SAC and Ramsar <p>A meaningful AA was not possible at the strategic level for demand-side measures and therefore, the AA is necessarily deferred to the project level. The AA of the supply-side options conclude no adverse impacts on the integrity of any European site through suitable mitigation.</p>	
Severn Trent Water Drought Plan ⁴²	<p>The Severn Trent Drought Plan covers the period 2022 - 2027.</p> <p>Severn Trent is in the process of preparing a statutory five-year Drought Plan from 2024 - 2032, replacing the current plan.</p>	<p>The Drought Plan outlines the operational steps that will be conducted if we face a drought in the next 5 years. It describes how supplies will be enhanced, demands managed, and environmental impacts minimised. It proposes ongoing leakage reduction measures, water efficiency and monitoring and metering activities. An HRA was not available at the time of writing.</p>	<p>Yes.</p> <p>The outputs of the Drought Plan will be taken into consideration as part of the in-combination water impacts in the HRA process.</p>

⁴¹ Severn Trent Water (2022) Habitats Regulations Assessment: Final Water Resources Management Plan 2024. Available at <https://www.severntrent.com/content/dam/wrmp24-documents-and-data-tables-st/final-WRMP24-HRA-Report.pdf> [Date accessed 24/11/25].

⁴² Severn Trent Water (2022) Drought Plan 2022-2027. Available at: <https://www.severntrent.com/content/dam/stw-plc/water-resource-zones/drought-plan-2022-2027.pdf> [Date accessed 24/11/25].

Appendix B: European Site Conservation Objectives and Threats and Pressures

Ensor's Pool SAC¹

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of the habitats of qualifying species;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Qualifying features:

S1092. *Austropotamobius pallipes*; White-clawed (or Atlantic stream) Crayfish

Threats and Pressures at European site which may be affected by the Local Plan^{2,3}:

- Air pollution; and,
- Water quality.

Humber Estuary SAC⁴

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;
- The populations of qualifying species; and,
- The distribution of qualifying species within the site.

Qualifying features:

H1110. Sandbanks which are slightly covered by sea water all of the time; Subtidal sandbanks

H1130. Estuaries

H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats

H1150. Coastal lagoons

¹ Natural England (2018) Ensor's Pool SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/6577286383927296> [Date accessed: 10/12/25].

² Natural England (2014) Ensor's Pool SAC SIP. Available at: <https://publications.naturalengland.org.uk/publication/5364843502632960> [Date accessed: 10/12/25].

³ Natural England (2019) Ensor's Pool SAC Conservation Objectives Supplementary Advice. Available at: <http://publications.naturalengland.org.uk/publication/6577286383927296> [Date accessed: 10/12/25].

⁴ Natural England (2018) Humber Estuary SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/5009545743040512> [Date accessed: 10/12/25].

Humber Estuary SAC⁴

H1310. *Salicornia* and other annuals colonising mud and sand; Glasswort and other annuals colonising mud and sand

H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

H2110. Embryonic shifting dunes

H2120. Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram

H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland

H2160. Dunes with *Hippophae rhamnoides*; Dunes with sea-buckthorn

S1095. *Petromyzon marinus*; Sea Lamprey

S1099. *Lampetra fluviatilis*; River Lamprey

S1364. *Halichoerus grypus*; Grey Seal

Threats and Pressures at European site which may be affected by the Local Plan ^{5,6}:

- Water pollution;
- Public access and disturbance;
- Air quality; and,
- Direct land take from development.

Humber Estuary SPA⁷

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

Qualifying features:

A021 *Botaurus stellaris*; Great Bittern (Non-breeding)

A021 *Botaurus stellaris*; Great Bittern (Breeding)

A048 *Tadorna tadorna*; Common Shelduck (Non-breeding)

A081 *Circus aeruginosus*; Eurasian Marsh Harrier (Breeding)

A082 *Circus cyaneus*; Hen Harrier (Non-breeding)

A132 *Recurvirostra avosetta*; Pied Avocet (Non-breeding)

A132 *Recurvirostra avosetta*; Pied Avocet (Breeding)

A140 *Pluvialis apricaria*; European Golden Plover (Non-breeding)

A143 *Calidris canutus*; Red Knot (Non-breeding)

⁵ Other threats / pressures identified in the SIP are not considered likely to be influenced by the Local Plan.

⁶ Natural England (2015) Humber Estuary (SAC and SPA) SIP. Available at: <http://publications.naturalengland.org.uk/file/5730884670980096> [Date accessed: 10/12/25].

⁷ Natural England (2019) Humber Estuary SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/publication/5382184353398784> [Date accessed: 10/12/25].

Humber Estuary SPA⁷

A149 *Calidris alpina alpina*; Dunlin (Non-breeding)

A151 *Philomachus pugnax*; Ruff (Non-breeding)

A156 *Limosa limosa islandica*; Black-tailed Godwit (Non-breeding)

A157 *Limosa lapponica*; Bar-tailed Godwit (Non-breeding)

A162 *Tringa totanus*; Common Redshank (Non-breeding)

A195 *Sterna albifrons*; Little Tern (Breeding)

Waterbird assemblage

Threats and Pressures at European site which may be affected by the Local Plan^{8,9}:

- Water pollution;
- Public access and disturbance;
- Air quality; and,
- Direct land take from development.

Humber Estuary Ramsar¹⁰

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
1	<p>The site is a representative example of a near-natural estuary with the following component habitats: dune systems and humid dune slacks, estuarine waters, intertidal mud and sand flats, saltmarshes, and coastal brackish/saline lagoons.</p> <p>It is a large macro-tidal coastal plain estuary with high suspended sediment loads, which feed a dynamic and rapidly changing system of accreting and eroding intertidal and subtidal mudflats, sandflats, saltmarsh and reedbeds. Examples of both strandline, foredune, mobile, semi-fixed dunes, fixed dunes and dune grassland occur on both banks of the estuary and along the coast. The estuary supports a full range of saline conditions from the open coast to the limit of saline intrusion on the tidal rivers of the Ouse and Trent. Wave exposed sandy shores are found in the outer/open coast areas of the estuary. These change to the more moderately exposed sandy shores and then to sheltered muddy shores within the main body of the estuary and up into the tidal rivers. The lower saltmarsh of the Humber is dominated by common cordgrass <i>Spartina anglica</i> and annual Glasswort <i>Salicornia</i> communities. Low to mid marsh communities are mostly represented by Sea Aster (<i>Aster tripolium</i>), Common Saltmarsh Grass (<i>Puccinellia maritima</i>) and Sea Purslane (<i>Atriplex portulacoides</i>) communities. The upper portion of the saltmarsh community is atypical, dominated by Sea Couch (<i>Elytrigia atherica</i>) (<i>Elymus pycnanthus</i>) saltmarsh community. In the upper reaches of the estuary, the tidal marsh community is dominated by the Common Reed (<i>Phragmites australis</i>) fen and Sea Club Rush (<i>Bolboschoenus maritimus</i>) swamp with the Couch Grass (<i>Elytrigia repens</i>) (<i>Elymus repens</i>) saltmarsh</p>

⁸ Other threats / pressures identified in the SIP are not considered likely to be influenced by the Local Plan.

⁹ Natural England (2015) Humber Estuary SIP. Available at: <http://publications.naturalengland.org.uk/file/5730884670980096> [Date accessed: 10/12/25].

¹⁰ JNCC (2007) Ramsar Information Sheet: Humber Estuary. Available at: <https://rsis.ramsar.org/RISapp/files/RISrep/GB663RIS.pdf> [Date accessed: 10/12/25].

Ramsar Criterion	Justification for the application of each criterion
	community. Within the Humber Estuary Ramsar site there are good examples of four of the five physiographic types of saline lagoon.
3	The Humber Estuary Ramsar site supports a breeding colony of Grey Seals (<i>Halichoerus grypus</i>) at Donna Nook. It is the second largest Grey Seal colony in England and the furthest south regular breeding site on the east coast. The dune slacks at Saltfleetby-Theddlethorpe on the southern extremity of the Ramsar site are the most north-easterly breeding site in Great Britain of the Natterjack Toad (<i>Bufo calamita</i>).
5	Assemblages of international importance: 153,934 waterfowl, non-breeding season (5 year peak mean 1996/97-2000/2001)
6	Species/populations occurring at levels of international importance.
Qualifying species/populations (as identified at designation):	
Species with peak counts in winter:	
Common Shelduck, (<i>Tadorna tadorna</i>), NW Europe	4464 individuals, representing an average of 1.5% of the population (5 year peak mean 1996/7-2000/1)
Eurasian Golden Plover, (<i>Pluvialis apricaria altifrons</i>) subspecies, NW Europe, W Continental Europe, NW Africa population	30,709 individuals, representing an average of 3.3% of the GB population (5 year peak mean 1996/7-2000/1)
Red Knot, (<i>Calidris canutus islandica</i>) subspecies	28165 individuals, representing an average of 6.3% of the population (5 year peak mean 1996/7-2000/1)
Dunlin, (<i>Calidris alpina alpina</i>), Europe	22222 individuals, representing an average of 1.7% of the population (5 year peak mean 1996/7-2000/1)
Black-tailed Godwit, (<i>Limosa limosa islandica</i>) subspecies	1,113 individuals, wintering, representing an average of 3.2% of the population (5 year peak mean 1996/7-2000/1)
Bar-tailed Godwit, (<i>Limosa lapponica lapponica</i>) subspecies	2,752 individuals, wintering, representing an average of 2.3% of the population (5 year peak mean 1996/7-2000/1)
Common Redshank, (<i>Tringa totanus totanus</i>)	4632 individuals, representing an average of 3.6% of the population (5 year peak mean 1996/7- 2000/1)
8	The Humber Estuary acts as an important migration route for both River Lamprey (<i>Lampetra fluviatilis</i>) and Sea Lamprey (<i>Petromyzon marinus</i>) between coastal waters and their spawning areas.
Threats and Pressures at European site which may be affected by the Local Plan:	
<ul style="list-style-type: none"> • Water pollution (domestic sewage). • Public access and disturbance. • Air quality. 	

River Mease SAC¹¹

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of the habitats of qualifying species;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Qualifying features:

H3260. Water courses of plain to montane levels with the *Ranunculon fluitantis* and *Callitricho-Batrachion* vegetation; Rivers with floating vegetation often dominated by water-crowfoot

S1092. *Austropotamobius pallipes*; White-clawed (or Atlantic stream) crayfish

S1149. *Cobitis taenia*; Spined loach

S1163. *Cottus gobio*; Bullhead

S1355. *Lutra lutra*; Otter

Threats and Pressures at European site which may be affected by the Local Plan ^{12,13}:

- Water pollution; and,
- Water abstraction.

Severn Estuary SPA¹⁴

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

Qualifying features:

A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding);

A048 *Tadorna tadorna*; Common shelduck (Non-breeding);

A051 *Anas strepera*; Gadwall (Non-breeding);

A149 *Calidris alpina alpina*; Dunlin (Non-breeding);

A162 *Tringa totanus*; Common redshank (Non-breeding); and

¹¹ Natural England (2018) River Mease SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/6217720043405312> [Date accessed: 10/12/25].

¹² Natural England (2014) River Mease SAC SIP. Available at: <https://publications.naturalengland.org.uk/publication/6640857448972288> [Date accessed: 10/12/25].

¹³ Natural England (2019) River Mease SAC Conservation Objectives Supplementary Advice. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030258.pdf> [Date accessed: 10/12/25].

¹⁴ Natural England (2019) Severn Estuary SPA Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6288530213175296> [Date accessed: 10/12/25].

Severn Estuary SPA¹⁴

A394 *Anser albifrons albifrons*; Greater white-fronted goose (Non-breeding) Waterbird assemblage – see table below.

On the most recent Natura 2000 standard data form¹⁵, the waterfowl assemblage population size was stated as 84,317 whilst the latest Wetland Birds in the UK report¹⁶ cites the figure of 86,836. The most recent form does not include a list of species which make up the waterfowl assemblage for the Severn Estuary SPA. However, the 2001 SPA Review¹⁷ lists 12 additional species (see Table B.1), which are referred to in the HRA report as “SPA Waterfowl Assemblage Species”¹⁸.

Threats and Pressures at European site which may be affected by the Local Plan^{19,20}:

- Public access and disturbance.
- Impacts of development.
- Air pollution.
- Water quality and quantity.
- Noise and visual disturbance.

Table B.1: Severn Estuary SPA Waterfowl Assemblage Species²¹:

English Name	Scientific name
Curlew	<i>Numenius arquata</i>
Grey Plover	<i>Pluvialis squatarola</i>
Lapwing	<i>Vanellus vanellus</i>
Mallard	<i>Anas platyrhynchos</i>
Pintail	<i>Anas acuta</i>
Pochard	<i>Aythya ferina</i>
Shoveler	<i>Anas clypeata</i>
Spotted Redshank	<i>Tringa erythropus</i>
Teal	<i>Anas crecca</i>
Tufted Duck	<i>Aythya fuligula</i>
Whimbrel	<i>Numenius phaeopus</i>
Wigeon	<i>Anas penelope</i>

¹⁵ <http://jncc.defra.gov.uk/pdf/SPA/UK9015022.pdf>

¹⁶ Frost, T.M., Calbrade, N.A., Birtles, G.A., Mellan, H.J., Hall, C., Robinson, A.E., Wotton, S.R., Balmer, D.E. & Austin, G.E. (2020) *Waterbirds in the UK 2018/19: The Wetland Bird Survey*. BTO, RSPB and JNCC, in association with WWT. British Trust for Ornithology, Thetford.

¹⁷ Stroud, D.A., Chambers, D., Cook, S., Buxton, N., Fraser, B., Clement, P., Lewis, P., McLean, I., Baker, H. & Whitehead, S. (eds). (2001) *The UK SPA network: its scope and content*. JNCC. Peterborough.

¹⁸ Palmer, E. and Smart, M. (2021) Identification of wintering and passage roosts on functionally linked land of the Severn Estuary - Gloucestershire and Worcestershire (Phase 5). Natural England Commissioned Reports. NECR401.

¹⁹ Natural England (2015) Severn Estuary (SPA and SAC) SIP. Available at: <http://publications.naturalengland.org.uk/publication/4590676519944192> [Date accessed: 10/12/25].

²⁰ Natural England (2012) Severn Estuary EMS Regulation 33 Conservation Advice Package. Available at: <http://publications.naturalengland.org.uk/publication/3184206> [Date accessed: 10/12/25].

²¹ Stroud, D.A., Chambers, D., Cook, S., Buxton, N., Fraser, B., Clement, P., Lewis, P., McLean, I., Baker, H. & Whitehead, S. (eds). (2001) *The UK SPA network: its scope and content*. JNCC. Peterborough.

Severn Estuary SAC²²

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Qualifying features:

H1110. Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks;

H1130. Estuaries;

H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats;

H1170. Reefs;

H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritima*); Atlantic salt meadows;

S1095. *Petromyzon marinus*; Sea lamprey;

S1099. *Lampetra fluviatilis*; River lamprey; and

S1103. *Alosa fallax*; Twaite shad.

Threats and Pressures at European site which may be affected by the Local Plan^{23,24}:

- Public access and disturbance;
- Impacts of development;
- Air pollution;
- Water quality and quantity; and,
- Noise and visual disturbance.

²² Natural England (2019) Severn Estuary SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/6377265718099968> [Date accessed: 10/12/25].

²³ Natural England (2015) Severn Estuary (SPA and SAC) SIP. Available at: <http://publications.naturalengland.org.uk/publication/4590676519944192> [Date accessed: 10/12/25].

²⁴ Natural England (2012) Severn Estuary EMS Regulation 33 Conservation Advice Package. Available at: <http://publications.naturalengland.org.uk/publication/3184206> [Date accessed: 10/12/25].

Severn Estuary Ramsar²⁵

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
1	Due to immense tidal range (second-largest in world), this affects both the physical environment and biological communities.
3	Due to unusual estuarine communities, reduced diversity and high productivity.
4	<p>This site is important for the run of migratory fish between sea and river via estuary. Species include:</p> <ul style="list-style-type: none"> • Salmon (<i>Salmo salar</i>); • Sea Trout (<i>S. trutta</i>); • Sea Lamprey (<i>Petromyzon marinus</i>); • River Lamprey (<i>Lampetra fluviatilis</i>); • Allis Shad (<i>Alosa alosa</i>); • Twaite Shad (<i>A. fallax</i>), and • Eel (<i>Anguilla Anguilla</i>). <p>It is also of particular importance for migratory birds during spring and autumn.</p>
5	<p>Assemblages of international importance:</p> <p>Species with peak counts in winter:</p> <p>70919 waterfowl (5 year peak mean 1998/99-2002/2003)</p>
6	Species/populations occurring at levels of international importance.
Qualifying species/populations (as identified at designation):	
Species with peak counts in winter:	
Tundra Swan, (<i>Cygnus columbianus bewickii</i>), NW Europe	229 individuals, representing an average of 2.8% of the GB population (5 year peak mean 1998/9-2002/3)
Greater White-Fronted Goose, (<i>Anser albifrons albifrons</i>), NW Europe	2076 individuals, representing an average of 35.8% of the GB population (5 year peak mean for 1996/7-2000/01)
Common Shelduck, (<i>Tadorna tadorna</i>), NW Europe	3223 individuals, representing an average of 1% of the population (5 year peak mean 1998/9-2002/3)
Gadwall, (<i>Anas strepera strepera</i>), NW Europe	241 individuals, representing an average of 1.4% of the GB population (5 year peak mean 1998/9-2002/3)
Dunlin, (<i>Calidris alpina alpina</i>), W Siberia/W Europe	25082 individuals, representing an average of 1.8% of the population (5 year peak mean 1998/9-2002/3)

²⁵ JNCC (2008) Ramsar Information Sheet: UK11081 Severn Estuary. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11081.pdf> [Date accessed: 10/12/25].

Common Redshank, (<i>Tringa totanus totanus</i>)	2616 individuals, representing an average of 1% of the population (5 year peak mean 1998/9- 2002/3)
Species/populations identified subsequent to designation for possible future consideration under criterion 6.	
Species regularly supported during the breeding season:	
Lesser Black-Backed Gull, (<i>Larus fuscus graellsii</i>), W Europe/Mediterranean/W Africa	4167 apparently occupied nests, representing an average of 2.8% of the breeding population (Seabird 2000 Census)
Species with peak counts in spring/autumn:	
Ringed Plover, (<i>Charadrius hiaticula</i>), Europe/Northwest Africa	740 individuals, representing an average of 1% of the population (5 year peak mean 1998/9- 2002/3)
Species with peak counts in winter:	
Eurasian Teal, (<i>Anas crecca</i>), NW Europe	4456 individuals, representing an average of 1.1% of the population (5 year peak mean 1998/9-2002/3)
Northern Pintail, (<i>Anas acuta</i>), NW Europe	756 individuals, representing an average of 1.2% of the population (5 year peak mean 1998/9- 2002/3)
8	<p>The fish of the whole estuarine and river system is one of the most diverse in Britain, with over 110 species recorded.</p> <p>Salmon (<i>Salmo salar</i>), Sea Trout (<i>S. trutta</i>), Sea Lamprey (<i>Petromyzon marinus</i>), River Lamprey (<i>Lampetra fluviatilis</i>), Allis Shad (<i>Alosa alosa</i>), Twaite Shad (<i>A. fallax</i>), and Eel (<i>Anguilla Anguilla</i>) use the Severn Estuary as a key migration route to their spawning grounds in the many tributaries that flow into the estuary.</p> <p>The site is important as a feeding and nursery ground for many fish species particularly Allis Shad (<i>Alosa alosa</i>) and Twaite Shad (<i>A. fallax</i>) which feed on mysid shrimps in the salt wedge.</p> <p>Threats and Pressures at European site which may be affected by the Local Plan²⁶:</p> <ul style="list-style-type: none"> • Public access and disturbance; • Impacts of development; • Air pollution; • Water quality and quantity; and, • Noise and visual disturbance.

²⁶ Natural England (2012) Severn Estuary EMS Regulation 33 Conservation Advice Package. Available at: <http://publications.naturalengland.org.uk/publication/3184206> [Date accessed: 10/12/25].

Appendix C: Screening evaluation of Proposed Submission Draft Local Plan

The Rugby Borough Local Plan policies and allocations have been screened using the DTA HRA pre-screening categories¹ presented in **Table C.1**.

Table C.1: Assessment and reasoning categories from Part F of the DTA Handbook

Screening evaluation and reasoning categories from Chapter F of the Habitats Regulations Assessment Handbook (DTA Publications, 2013)	Screen in / out
A. General statements of policy / general aspirations.	Screen Out
B. Policies listing general criteria for testing the acceptability / sustainability of proposals.	Screen Out
C. Proposal referred to but not proposed by the Plan.	Screen Out
D. General plan-wide environmental protection / designated site safeguarding / threshold policies.	Screen Out
E. Policies or proposals that steer change in such a way as to protect European sites from adverse effects.	Screen Out
F. Policies or proposals that cannot lead to development or other change.	Screen Out
G. Policies or proposals that could not have any conceivable or adverse effect on a site.	Screen Out
H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in-combination with other aspects of this or other plans or projects).	Screen Out
I. Policies or proposals with a Likely Significant Effect on a site alone.	Screen In
J. Policies or proposals unlikely to have a significant effect alone.	Screen Out
K. Policies or proposals unlikely to have a significant effect either alone or in-combination.	Screen Out
L. Policies or proposals which might be likely to have a significant effect in-combination.	Screen In
M. Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site.	Screen In

¹ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook edition UK: DTA Publications Limited. Available at: www.dtapublications.co.uk [Date accessed: 10/12/25]

The following section of **Appendix C** provides a screening evaluation of policies which comprise the Proposed Submission Draft Local Plan.

Chapter 1: Strategy

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
S1	Settlement Hierarchy	This policy sets out that new development will be of a scale commensurate with the services and facilities of the settlement and local context (i.e. Rugby urban area, main rural settlements and other rural settlements). Rugby urban areas will be the main focus for new homes and employment. It will not trigger development and will therefore not have an LSE on any European site either alone or in-combination.	Category F	Screen Out
S2	Strategy for homes	This policy sets out the delivery of 10,812 new homes over the Plan period (2025-2042) (636 dwellings per year). It outlines the locations of this provision, totalling 11,729 residential dwellings. New residential development cumulatively across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSE at a number of European sites.	Category L	Screen In
S3	Strategy for employment land	This policy sets out the delivery of approx. 1.4ha of office floorspace and 299ha of B2 and B8 buildings over the Plan period. It outlines the locations of this provision, totalling approx. 1,084,900sq m. New employment development cumulatively across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSEs at a number of European sites.	Category L	Screen In
S4	Sites for Gypsies and Travellers	This policy sets out the provision of Gypsy and Traveller sites for 68 pitches (new allocations accounting for 58 pitches). It sets out the requirements of planning applications for pitches on non-allocated sites and safeguards existing and new permanent Gypsy and Traveller sites for Gypsy and Traveller use. New Gypsy and Traveller provision cumulatively across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSEs at a number of European sites. These allocations are illustrated on Figure C.1 .	Category L	Screen In
S5	Countryside protection	This policy sets out the requirements of new development outside the allocations and outlines the application of national Green Belt policy within the borough. It outlines a plan-wide protection policy and will therefore not have an LSE on any European site either alone or in-combination.	Category F	Screen Out
S6	Residential allocations	This policy outlines the number of dwellings for each residential allocation and the principles for their development. New residential development cumulatively	Category L	Screen In

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
		across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSEs at a number of European sites. These allocations are illustrated on Figure C.2 .		
S7	Employment allocations	This policy outlines the approximate floorspace for each employment allocation and the principles for their development, totalling 865,000sq m. New employment development cumulatively across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSEs at a number of European sites. These allocations are illustrated on Figure C.3 .	Category L	Screen In
S8	South West Rugby	This policy outlines the delivery of South West Rugby, a new neighbourhood of approx. 4,000 dwellings together with employment land. It sets out the provision of infrastructure at the site and the principles for development, including the physical and visual separation from Dunchurch through a green buffer. Development of the site cumulatively across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSEs at a number of European sites.	Category L	Screen In
S9	South West Rugby spine road network	This policy outlines the delivery of a spine road network and will not permit development which prejudice its delivery. Infrastructure development of the site cumulatively across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSEs at a number of European sites.	Category L	Screen In

Chapter 2: Climate

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
CL1	Net zero buildings	This policy sets out requirements in terms of net zero in new buildings. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
CL2	Renewable energy and low carbon technology	This policy permits renewable energy and low energy development proposals subject to meeting the policy requirements. It sets out the requirements of permitting Green Belt proposals. It will not have an LSE on any European site either alone or in-combination.	Category F	Screen Out
CL3	Water supply, quality and efficiency	This policy sets out requirements in terms of water supply, water quality and water efficiency for new development. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
CL4	Climate adaptation	This policy requires all development to be resilient to and adapt to the future impacts of climate change, including urban cooling, reducing air conditioning and managing flood risk. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

Chapter 3: Economy

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
E1	Employment land protection	This policy protects employment land designated within the Local Plan. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
E2	Employment development	This policy outlines the requirements of development of employment sites outside of employment allocations. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
E3	Rural economy	This policy outlines the types of development acceptable in and outside of rural settlement boundaries, subject to requirements. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

Chapter 4: Centres

Policy number	Policy name	Justification: Activities that may result in a LSE on a European site	Screening category	HRA screening
C1	Rugby town centre	This policy outlines the development up to 2042 in Rugby town centre, including the redevelopment of Rugby Central Shopping Centre, a new mixed-use hub and a new apartment living quarter. It sets out the placemaking principles of development in the town centre. Development of Rugby town centre cumulatively across the Plan area and in-combination with neighbouring LPA growth (set out in Appendix A) has the potential to have water and recreation LSEs at a number of European sites.	Category L	Screen In
C2	Main town centre uses	This policy sets out the requirements of development within main town centres. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
C3	Local and district centres	This policy sets out the requirements of development within local and district centres. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
C4	Neighbourhood hubs	This policy supports Use Classes E, F.1, F.2 and other community facilities at ground floor units. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

Chapter 5: Environment

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
EN1	Biodiversity and geodiversity protection	The policy sets out the application of national policy and legislation for developments with the potential to harm biodiversity. It outlines that development likely to result in the harm to or loss of Local Wildlife Site, Local Nature Reserve or Local Geological Site will not be permitted, subject to requirements. It outlines a plan-wide environmental protection policy and will therefore not have an LSE on any European site either alone or in-combination.	Category D	Screen Out
EN2	Landscape protection	This policy sets out that development will avoid adverse impacts on landscape and requires development to be sensitively located and designed. It outlines a plan-wide landscape protection policy and will therefore not have an LSE on any European site either alone or in-combination.	Category D	Screen Out
EN3	Areas of High Landscape Value	This policy requires development located within the Ironstone Fringe and Rainsbrook Valley slopes Areas of High Landscape Value to protect and enhance the landscape. It outlines a plan-wide landscape protection policy and will therefore not have an LSE on any European site either alone or in-combination.	Category D	Screen Out
EN4	Biodiversity net gain	This policy sets out accordance with the requirements Biodiversity Net Gain under the Environment Act 2021. It outlines a plan-wide environmental protection policy and will therefore not have an LSE on any European site either alone or in-combination.	Category D	Screen Out
EN5	Canopy cover	This policy requires all major development outside of Rugby town centre to increase post-development canopy cover to at least 20% of the site area. It outlines a plan-wide environmental policy and will therefore not have an LSE on any European site either alone or in-combination.	Category D	Screen Out
EN6	Flood risk	This policy outlines the requirements to permit development within an area of flood risk. It safeguards the functional floodplain, areas for flood risk management and areas within 8m from the edge of a watercourse from built development. It outlines a plan-wide policy and will therefore not have an LSE on any European site either alone or in-combination.	Category D	Screen Out

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
EN7	Environmental protection and amenity	This policy protects human health and wellbeing and amenity from development. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category D	Screen Out
EN8	Air Quality	This policy outlines the air quality standards for development of more than 1,000sq m or 10 or more dwellings, and measures to offset any shortfall. It will not trigger any development or change which may have an LSE on any European site either alone or in-combination.	Category D	Screen Out

Chapter 6: Housing

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
H1	Housing mix	This policy sets out the contribution to meeting the housing needs of the borough including a mix of housing tenure, types and sizes to support the creation of mixed, balanced and inclusive communities. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
H2	Affordable housing	This policy sets out the provision of affordable homes within the borough. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
H3	Rural worker dwellings	This policy sets out the requirements of a permanent dwelling for occupation by a person engaged in agricultural or land-based rural business. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
H4	Rural exception sites	This policy sets out the requirements of rural exception sites. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
H5	Replacement dwellings	This policy sets out the requirements of replacement dwellings. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
H6	Specialist housing	This policy sets out the requirements of specialist housing. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
H7	Housing standards	This policy sets out the requirements of new dwellings to meet the Nationally Described Space Standards. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
H8	Housing in multiple occupation	This policy sets out the requirements of houses in multiple occupation (HMOs). It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

Chapter 8: Wellbeing

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
W1	Protection of community facilities	This policy protects community facilities and outlines exceptions. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
W2	Open space and sports provision	This policy sets out the open space standards for residential developments of 10 or more dwellings. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

Chapter 9: Design

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
D1	Well-designed places	This policy requires development to create or contribute to well-designed places, setting a set of criteria for development. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category B	Screen Out
D2	Infill and householder development	This sets out the requirements of infill and householder development including extensions and alterations to existing dwellings. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
D3	Landscaping	This policy outlines the requirements of development in terms of landscaping. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
D4	Historic environment	This policy supports development that sustains and enhances the borough's heritage assets. It sets out the requirements of developments with the potential to affect the significance of a heritage asset. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
D5	Sustainable drainage	This policy sets out the management of surface water run-off through Sustainable Drainage Systems (SuDs) and sets out the requirements of these SuDs. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

Chapter 10: Infrastructure

Policy number	Policy name	Justification: Activities that may result in an LSE on a European site	Screening category	HRA screening
11	Transport	This policy sets out the provision of transport in line with the transport user hierarchy outlined in the Warwickshire Local Transport Plan and prioritises active travel including cycling and walking infrastructure provision. It sets out the requirements of transport development. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
12	Parking	This policy sets out the provision of adequate parking for bicycles and vehicles in accordance with parking standards, including meeting the needs of people with disabilities or impaired mobility. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
13	Communications Infrastructure	This policy sets out the provision of communications infrastructure including full fibre broadband connections. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
14	Infrastructure and planning obligations	This policy sets out the provision of infrastructure in line with development. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out
15	New railway stations	This policy safeguards land to support the delivery of the proposed Nuneaton Parkway and Rugby Parkway railway stations. It will not trigger any development or a change which may have an LSE on any European site either alone or in-combination.	Category F	Screen Out

The Proposed Submission Draft Regulation 19 Local Plan sets out the following residential and employment allocations (see **Figures C.1 to C.3**).

Local Plan Site ID	Site Name	Residential or employment development?	Approximate residential dwellings / employment floorspace
54	Oakdale Nursery, Binley Woods	Residential	43 dwellings
337	West Farm and Home Farm, Brinklow	Residential	75 dwellings
315	Land south of Rugby Road, Brinklow	Residential	250 dwellings
129	Land North of Lilbourne Road, Clifton upon Dunsmore	Residential	60 dwellings
202	Newton Road, Clifton upon Dunsmore	Residential	80 dwellings
307	North Road, Clifton upon Dunsmore	Residential	10 dwellings
316	Land at Long Lawford	Residential	400 dwellings
253	Lawford Fields Farm	Residential	250 dwellings
172	Elizabeth Way, Long Lawford	Residential	5 dwellings
87	Hillcrest Farm, Newton	Residential	25 dwellings
62	Morgan Sindall House, Rugby town centre	Residential	90 dwellings
332	Former Rugby Borough Council depot, Albert Street, Rugby	Residential	25 dwellings
353	Town Hall, Rugby	Residential	124 dwellings
283	Rugby Central Shopping Centre	Residential	200 dwellings
350	Rounds Gardens, Rugby	Residential	70 dwellings
351	North of Rounds Gardens, Rugby	Residential	60 dwellings
354	92 Lower Hillmorton Road, Rugby	Residential	34 dwellings
279	Former Stagecoach car park, Railway Terrace, Rugby	Residential	32 dwellings

Local Plan Site ID	Site Name	Residential or employment development?	Approximate residential dwellings / employment floorspace
153	Westway Car Park, Rugby	Residential	24 dwellings
294	Land adjacent to 9 Railway Terrace, Rugby	Residential	14 dwellings
356	The Railings (NHS) off Woodside Park, Rugby	Residential	105 dwellings
357	28-29 High Street, Rugby	Residential	8 dwellings
352	Former Snooker Hall, Railway Terrace, Rugby	Residential	7 dwellings
349	Land to the rear of Albert Street, Rugby	Residential	5 dwellings
355	Land adjacent to 44 Craven Road, Rugby	Residential	5 dwellings
59	Newton Manor Lane, Brownsover	Residential	285 dwellings
338	Land south of Crick Road, Houlton	Residential	250 dwellings
100	Land at High Street, Ryton-on-Dunsmore	Residential	37 dwellings
6	Land east of Fosse Way opposite Knob Hill, Stretton-on-Dunsmore	Residential	3 dwellings
81	Land West of Fosse Way, Stretton-on-Dunsmore	Residential	40 dwellings
348	The Croft, School Lane, Stretton-on-Dunsmore	Residential	70 dwellings
39	Dyers Lane, Wolston	Residential	15 dwellings
136	Land North of Warwick Road, Wolston	Residential	80 dwellings
358	Land at Coventry Road, Wolvey	Residential	60 dwellings
309	Land north of B4109, Wolvey	Residential	150 dwellings
64	Coton Park east, Rugby	Employment	115,000m ²
17	South West Rugby employment phase 2	Employment	130,000m ²
14	North of Ansty Park	Employment	75,000m ²

Local Plan Site ID	Site Name	Residential or employment development?	Approximate residential dwellings / employment floorspace
95	Crowner Fields Farm and Home Farm, Hinckley Road, Ansty	Employment	275,000m ²
121	Land at Walsgrave Hill	Employment	290,000m ²

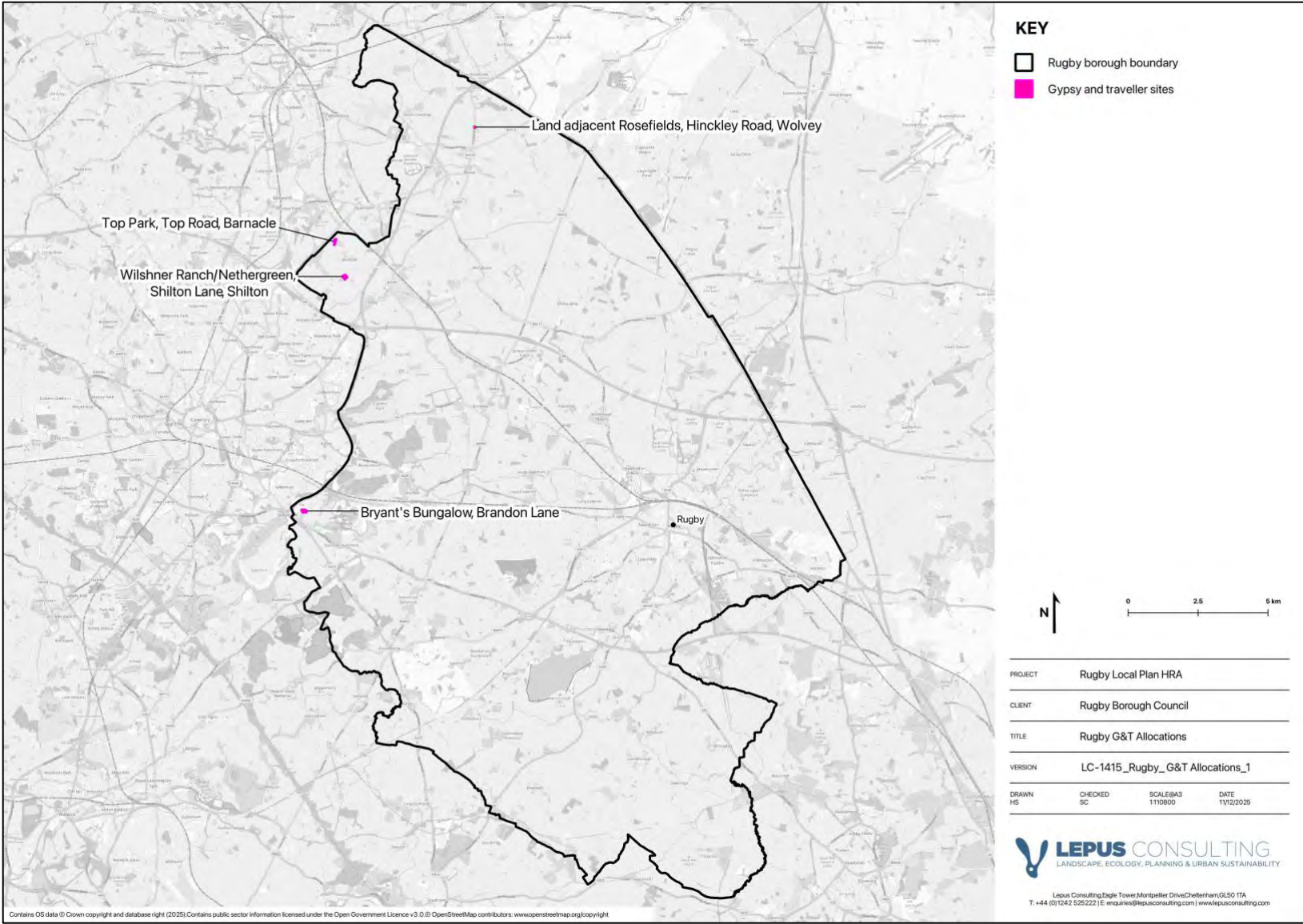


Figure C.1: Rugby Gypsy and Traveller site allocations

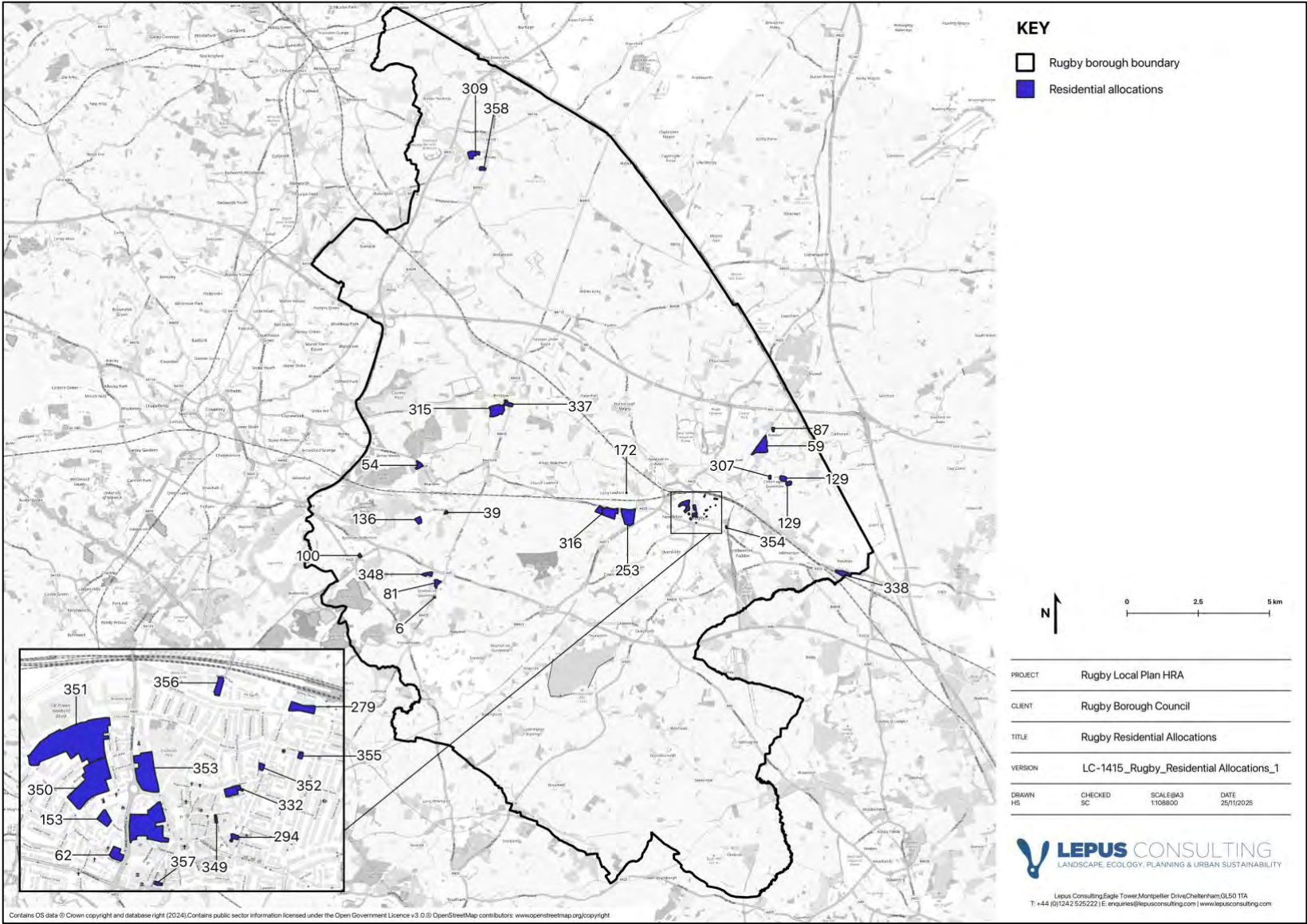


Figure C.2: Rugby residential allocations

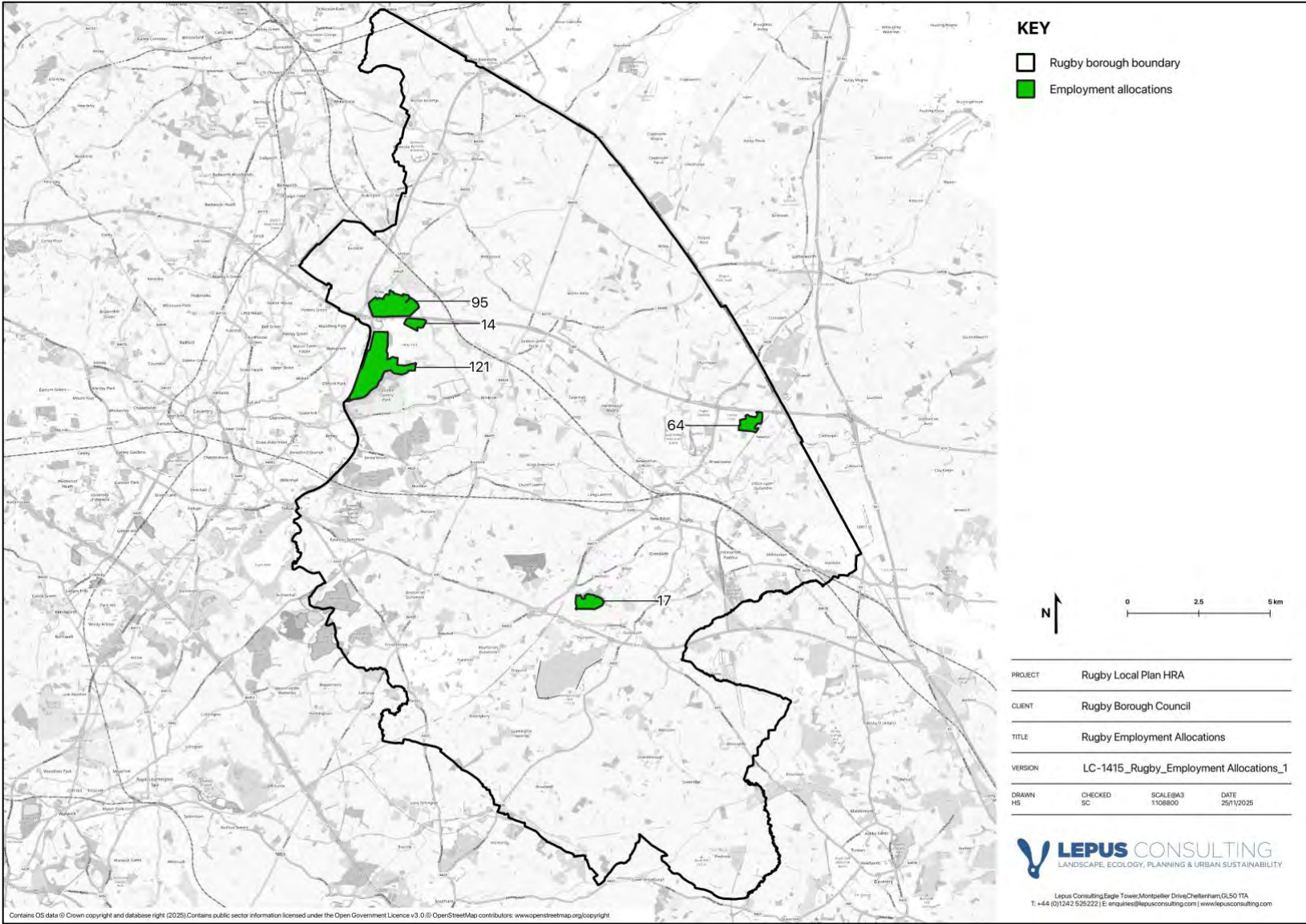


Figure C.3: Rugby employment allocations

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Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys

Biodiversity Net Gain



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Eagle Tower

Montpellier Drive

Cheltenham

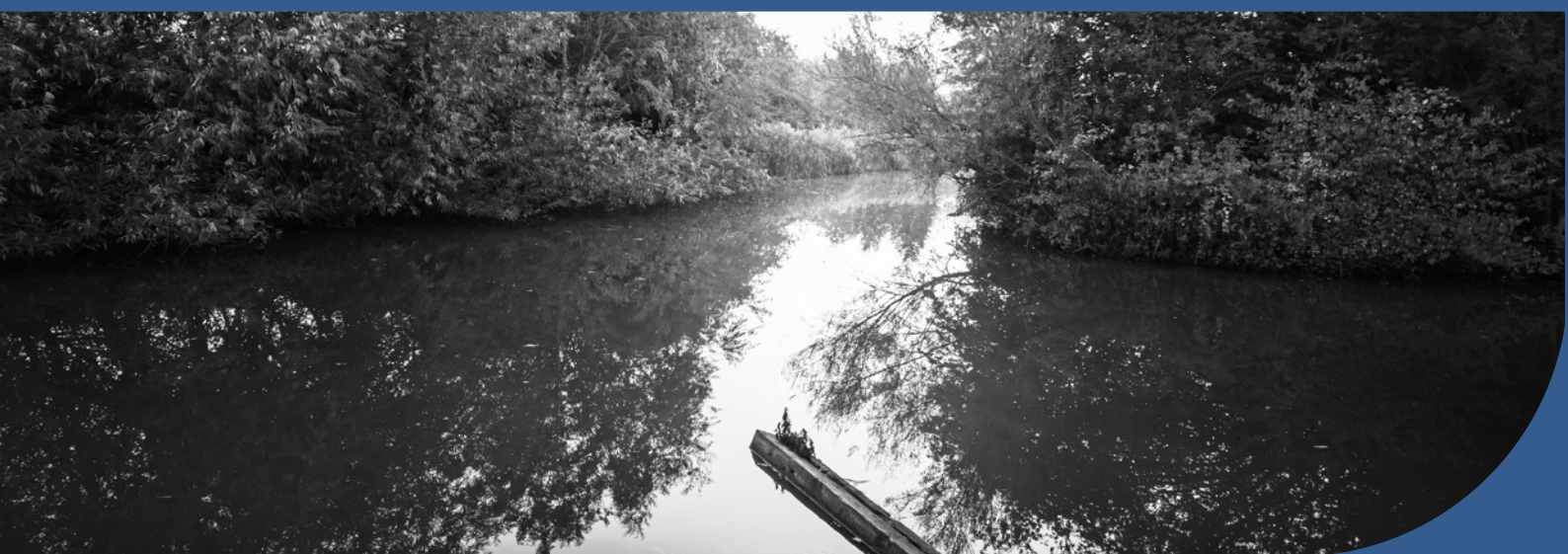
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EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:

Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509



Equality Impact Assessment

Service Area	Growth and Investment
Policy/Service being assessed	Local Plan – Pre-submission (Regulation 19) version
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	New policy Rugby Borough has a local plan (2011-2031) which was adopted in 2019. It is necessary to review the local plan every 5 years to determine whether it is still up to date. The Council decided to commence a full review of the local plan, and has subsequently held two public consultations: Issues and Options (October 2023-2024) and Preferred Options (March-May 2025). An EQIA was produced for the decisions in respect of both of these consultations.
EqIA Review Team – List of members	Hayley Smith
Date of this assessment	03 December 2025
Signature of responsible officer (to be signed after the EqIA has been completed)	Nicola Smith

A copy of the completed and signed Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Officer.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	<p>A local plan sets out policies for land use and development. It sets out the strategy for meeting the borough's housing and employment needs over the plan period, along with required infrastructure. In addition, the stated objectives of the local plan are:</p> <ol style="list-style-type: none"> 1) Support the diversification and growth in sustainable locations of Rugby Borough's economy in line with the Economic Strategy 2) Support the revival of Rugby Town Centre 3) Reduce carbon emissions and adapt to climate change 4) Raise design standards 5) Deliver infrastructure-led growth 6) Facilitate a greener, more biodiverse borough

<p>(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?</p>	<p>The local plan is relevant to and aligns with and supports the Council's Corporate priorities:</p> <p>A healthier Rugby – land use and development have a role in promoting healthy behaviours and lifestyles, by affording opportunities for active travel and access to quality parks and open space. In addition, the necessary health facilities and services to support housing growth also form part of the local plan and Infrastructure Delivery Plan.</p> <p>A thriving Rugby – the local plan is part of the 'how' identified in the Corporate Strategy for delivering this priority, and it is amongst the stated objectives of the local plan to support diversification and growth in line with the Economic Strategy and support the revival of Rugby Town Centre (see above). The publication draft of the plan (Regulation 19), includes a spatial strategy and land allocations for employment growth, as well as policies to support the wider economy and Rugby Town Centre. Policy C1 specifically seeks to support the revitalisation of the town centre through specific interventions, including the cultural quarter referenced in the corporate priorities as well as placemaking principles to guide the quality of the environment.</p> <p>A greener Rugby – the publication plan (Regulation 19) includes a policy section on 'climate' which relates to mitigation and adaptation to climate change in line with this corporate priority. It includes a policy to require new buildings to be net zero in operation, a policy to support renewable energy and low carbon technology, a policy on water and efficiency and a climate adaption policy.</p> <p>The 'environment' section of the local plan includes policies on biodiversity and landscapes, and site allocations include principles related to the provision of open space as appropriate.</p> <p>A fairer Rugby – the overarching purpose of the local plan is to set out the borough's development needs over the plan period and the strategy for how these will be met. Housing is a key part of this, and aligns with this corporate priority. The 'housing' section of the plan includes policies regarding affordable housing, specialist housing and HMOs as well as policies relating to housing standards, aimed (in combination with other design policies) at improving the quality of housing delivered.</p>
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(3) What are the expected outcomes you are hoping to achieve?	<p>The local plan sets out the strategy for how the housing, employment and other development needs of the borough will be met over the plan period.</p> <p>It also sets out policies against which planning applications will be assessed and which will therefore guide decision making.</p>
(4) Does or will the policy or decision affect: <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>Given the policy content, the geographical scope of the local plan (i.e. the entire borough), and the extent of the plan period to 2042, the local plan has the potential to affect many people who live and/or work in the borough, and who visit during the plan period and beyond. As such, the content of the document is relevant to the Public Sector Equality Duty.</p>
(5) Will the policy or decision involve substantial changes in resources?	<p>Upon adoption of the new local plan (anticipated in 2027), it will replace the currently adopted local plan. Substantial changes in resources are not therefore envisaged.</p>
<u>Stage 2 – Evidence about user population and consultation</u>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>

(1) What does the data tell you about the groups this policy or decision impacts?

Possible data sources:

- national statistics/census data
- local statistics
- evaluations
- analysis of complaints
- user feedback
- outcomes from consultation/community voice
- Council published information, service data
- [District and Ward Profile – Warwickshire Observatory](#)
- [Office of National Statistics](#)
- [Fingertips health profiles](#)
- [Indices of Multiple Deprivation](#)
- [RBC Annual Workforce Equality Report](#)

The data analysis for the local plan has been through a range of evidence base documents. In relation to the local population, these notably include (not an exhaustive list):

- Housing and Economic Development Needs Assessment (HEDNA) (2022) and Addendum Report (2024) – this report was prepared on behalf of the Coventry and Warwickshire Local Authorities to provide a joint and integrated assessment of the need for housing, economic growth potential and employment land needs.
- Housing Needs Report (2025) – updates the housing need information in the HEDNA for different groups
- Gypsy and Traveller, Travelling Showperson and Houseboat Accommodation Needs Assessment (2025) – addresses the specific needs of these groups to inform how these may be met through the local plan.
- The Development of the Borough 2011-2024 topic paper – this paper provides a broad overview of how the borough has changed over this period, focussing on demographics, housing, the local economy and the built environment.
- Houses in Multiple Occupation (HMO) topic paper (2025) – this paper examines trends in HMOs within the borough, and examines ways in which the Council might manage their development.
- Sustainability Appraisal (2025) – an evaluation of the social, economic and environmental impacts of the development plan, including reasonable alternative strategies.
- Education topic paper (2025) – this paper summarises the key findings of modelling undertaken for school place provision across the borough. This modelling has informed the spatial strategy of the plan.

(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?

If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?

The process leading to the production of the Regulation 19 local plan has included two public consultations:

- Issues and Options (Regulation 18) October 2023 – February 2024
- Preferred Options (Regulation 18) March-May 2025

Details of how the consultations were conducted, summaries of the feedback received, and how at each stage the plan has been amended to reflect the feedback, are set out in the 'Consultation Statement' to be published as part of the evidence for the Regulation 19 publication plan.


In addition to the public consultations, officers have liaised with infrastructure and service providers throughout the evolution of the plan, as well as other stakeholders under the Duty to Cooperate. A Duty to Cooperate Statement is in preparation.

In summary, all of the above have shaped the strategy and policies of the local plan, with the aim of delivering the objectives outlined above. This EQIA therefore provides a high-level assessment of various policy areas highlighted, based on the protected characteristics.

The plan primarily relates to the use and development of land, and seeks to address people's needs in relation to how land is used (i.e. for homes, employment, transport, services and facilities, and in the creation of a well-designed, safe and healthy environment). As such, the policies are intended to have overall beneficial effects for the local population, as they are designed and written to address the needs of everyone. These beneficial effects extend most notably to 'protected characteristics' and other relevant characteristics that can act as a barrier to those needs being met. Appendix 1 sets out a high-level assessment of the impacts of each policy within the Regulation 19 plan on protected characteristics. This illustrates a neutral or positive impact of all policies.

(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.	Further to the above consultations, there will be another public consultation on the publication plan (Regulation 19). Following this consultation the plan will be submitted for independent examination in public.		
<u>Stage 3 – Analysis of impact</u>			
(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified	Protected Characteristic	Nature of Impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high

<p>for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	<p>Age</p>	<p>Positive impact.</p> <p>The local plan includes consideration of family housing provision, including affordable housing. The Housing Needs Report (2025) (from p42) sets out the affordable housing need in the borough and updates the position set out in the HEDNA.</p> <p>The plan seeks to ensure that infrastructure is aligned to development (e.g. schools, health, open space and active travel networks). Evidence of school places (see topic paper) for example, has informed the strategy.</p> <p>According to 2021 census data, 18.1% of the borough's population is aged over 65 (see Housing Needs Report (2025) from page 91 which updates the information in the HEDNA from page 305). Housing policies (specifically H6) and land allocations support the provision of specialist housing for older persons.</p>	<p>Low</p>
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	<p>Disability</p>	<p>Positive impact</p> <p>There are a wide range of needs amongst people living with disability. It is recognised that there can be multiple barriers to living independently and to health and wellbeing. These can include isolation, access to services, transport options, and undersupply of specialist or flexible housing. 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</p>	<p>Low/medium</p>
	<p>Page 10 of 23</p>	<p>meeting requirements for wheelchair users.</p>	

	Sex	<p>No direct impact.</p> <p>The pattern and location of development may have some impacts with regard to gender. These can sometimes be linked to other characteristics such as age, as on average women live longer than men.</p>	Low
	Gender reassignment	<p>No direct impact.</p> <p>Local plan policies seek to respond to the needs of all in the community, avoid discrimination and promote inclusivity. No direct impact is concluded on gender reassignment, though a range of policies will be applicable depending on the individual/household circumstance.</p>	Low
	Marriage/civil partnership	<p>No impact.</p> <p>This characteristic is not considered to be affected differently by the policies within the local plan.</p>	Low

	Pregnancy/maternity	<p>No direct impact.</p> <p>Although it is concluded that there is no direct impact, it is considered that a range of policies within the plan will be applicable depending on the individual/household circumstances.</p> <p>A proportion of the population will be pregnant at any time and/or looking after young children. This may have implications for their housing need, and access to facilities including health care and open space, and eventually schools. How these matters are addressed is relevant to the local plan.</p>	Low
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	Race	<p>No direct impact /positive impact</p> <p>The local plan policies and allocations aim to ensure that there is sufficient land to meet the housing and other needs of the population.</p> <p>Policy S4 specifically identifies allocations to meet the accommodation needs of gypsies and travellers as set out in the evidence base. This policy demonstrates a supply of land for gypsy and traveller accommodation, which has not been the case in the current adopted local plan. Hence this is considered a positive impact compared with the current position. Whilst S4 does not identify supply for the entire plan period, efforts continue through the Duty to Cooperate to address this matter.</p>	Low
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	Religion/belief	<p>Limited positive impact.</p> <p>Individuals and groups of different religions and faiths may face barriers in accessing suitable places of worship. The local plan can influence the protection of existing community facilities and the location of any new facilities, and can therefore influence opportunities for religious groups to practice their religion and worship</p>	Low
	Sexual Orientation	<p>No direct impact.</p> <p>No direct impact is concluded, though some policies may be relevant dependent upon individual/household circumstances.</p>	Low
<p>(2) <u>Cross cutting themes</u></p> <p>(a) Are your proposals likely to impact on social inequalities e.g. child poverty,</p>	Description of impact	<p>Nature of impact</p> <p>Positive, Neutral, Adverse (explain why)</p>	<p>Extent of impact</p> <p>Low, medium, high</p>

<p>geographically disadvantaged communities? If yes, please explain how?</p>	<p>Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition</p>	<p>Positive As set out above, the evidence underpinning the local plan, the land use and development strategy and policies within it, take account of a range of needs to ensure that the borough delivers the right types of developments for a range of needs. In meeting the identified needs, the local plan aims to have a positive impact in reducing social inequalities. In respect of socio-economic inequalities, the development of the local economy, employment opportunities and skills and community facilities are all influenced by the local plan. A list of policies and an assessment of impact is included in Appendix 1.</p>	<p>Medium</p>
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	<p>Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution</p>	<p>Positive. Housing delivery and transport links are directly influenced by the local plan, as is access to services. Policies are included in relation to air quality, open space and amenity related design requirements.</p>	<p>Medium</p>
<p>(3) Using the information gathered in stages 2 and 3, please describe how the policy/strategy/service will:</p> <ul style="list-style-type: none"> a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic 	<p>The local plan is concerned with land use and development. There are factors within this which can influence the advance of equality, as has been highlighted above. In summary, the local plan can influence equality of opportunity through planning to meet identified housing need, planning for employment land for jobs, and appropriate expansion or new facilities and services such as school places, where needed. It can also influence opportunities for active travel, supporting local trips, and public transport provision (albeit this is delivered by others) to provide improved accessibility within the borough and beyond.</p> <p>In meeting the development needs of the local community, the local plan has a role in supporting good relations, as frictions and disparities between groups may be reduced.</p>		
<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>	<p>Not applicable. The local plan includes strategy and policy.</p>		

<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>The Council will monitor the implementation and impact of the local plan through the production of its Authority Monitoring Report (AMR). The AMR includes information on delivery against local plan policies, including (but not limited to) the provision of housing (including affordable housing), and employment development.</p>
<p>(6) Complete this section if any adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.</p>	<p>N/a – no adverse impacts identified.</p>

<p><u>Stage 4 – Action Planning, Review and Monitoring</u></p>	
<p>(1) Data analysis</p> <p>What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?</p> <p>The feedback/data should be used to inform your Action Plan in (2)</p>	

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqIA Action Plan</p> <table border="1"> <thead> <tr> <th>Action</th> <th>Lead Officer</th> <th>Date for completion</th> <th>Resource requirements</th> <th>Comments</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(3) Review and Monitoring</p> <p>State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>																														

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on (03 December 2025) and will be reviewed at the point of adoption of the local plan.’

Appendix 1 – Equalities Impact Assessment, Regulation 19 local plan

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
S1 – Settlement hierarchy	0	0	0	0	0	0	0	0	0
S2 – Strategy for homes	+	+	+	+	+	+	+	+	+
S3 – Strategy for employment land	+	+	+	+	+	+	+	+	+
S4 – Sites for Gypsies and Travellers	0	0	0	0	0	0	+	0	0
S5 – Countryside Protection	0	0	0	0	0	0	0	0	0
S6 – residential allocations	0	0	0	0	0	0	0	0	0
S7 – employment allocations	0	0	0	0	0	0	0	0	0
S8 – South West Rugby	0	0	0	0	0	0	0	0	0
S9 – South West Rugby spine road network	0	0	0	0	0	0	0	0	0
CL1 – Net zero buildings	+	+	+	+	+	+	+	+	+

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
CL2 – Renewable energy and low carbon technology	0	0	0	0	0	0	0	0	0
CL3 – Water supply, water quality and efficiency	0	0	0	0	0	0	0	0	0
CL4 – Climate adaptation	+	+	+	+	+	+	+	+	+
E1 – Employment land protection	0	0	0	0	0	0	0	0	0
E2 – employment development	0	0	0	0	0	0	0	0	0
E3 – rural economy	0	0	0	0	0	0	0	0	0
C1 – Rugby town centre	+	+	+	+	+	+	+	+	+
C2 – Main town centre uses	0	0	0	0	0	0	0	0	0
C3 – Local and district centres	0	0	0	0	0	0	0	0	0
C4 – Neighbourhood hubs	+	+	+	+	+	+	+	+	+
EN1 –	0	0	0	0	0	0	0	0	0

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
Biodiversity and geodiversity protection									
EN2 – Landscape protection	0	0	0	0	0	0	0	0	0
EN3 – Area of elevated landscape sensitivity	0	0	0	0	0	0	0	0	0
EN4 – Areas of separation	0	0	0	0	0	0	0	0	0
EN5 – Biodiversity net gain	+	+	+	+	+	+	+	+	+
EN6 – Canopy cover	+	+	+	+	+	+	+	+	+
EN7 – Flood risk	0	0	0	0	0	0	0	0	0
EN8 – Environmental protection and amenity	+	+	+	+	+	+	+	+	+
EN9 – Air quality	+	+	+	+	+	+	+	+	+
H1 – Housing mix	+	+	+	+	+	+	+	+	+
H2 – Affordable housing	+	+	+	+	+	+	+	+	+
H3 – Rural	0	0	0	0	0	0	0	0	0

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
worker dwellings									
H4 – Rural exception sites	0	0	0	0	0	0	0	0	0
H5 – replacement dwellings	0	0	0	0	0	0	0	0	0
H6 – Specialist housing	+	+	+	+	+	+	+	+	+
H7 – Housing standards	+	+	+	+	+	+	+	+	+
H8 – Houses in Multiple Occupation	+	+	+	+	+	+	+	+	+
W1 – Protection of community facilities	+	+	+	+	+	+	+	+	+
W2 – Open space and sports provision	+	+	+	+	+	+	+	+	+
D1 – Well designed places	+	+	+	+	+	+	+	+	+
D2 – Infill and householder development	0	0	0	0	0	0	0	0	0
D3 - Landscaping	0	0	0	0	0	0	0	0	0

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
D4 – Historic environment	0	0	0	0	0	0	0	0	0
D5 – Sustainable drainage	0	0	0	0	0	0	0	0	0
I1 - Transport	+	+	+	+	+	+	+	+	+
I2 - Parking	+	+	0	0	0	0	0	0	0
I3 – Communication infrastructure	0	0	0	0	0	0	0	0	0
I4 – Infrastructure and planning obligations	0	0	0	0	0	0	0	0	0
I5 – New railway stations	0	0	0	0	0	0	0	0	0

Appendix 7 Statement of Community Involvement 2026

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**RUGBY BOROUGH COUNCIL
STATEMENT OF COMMUNITY
INVOLVEMENT
JANUARY 2026**

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1. INTRODUCTION

What is the purpose of planning?

1.1 The purpose of planning is to contribute to the achievement of sustainable development. Rugby Borough Council (RBC) is the Local Planning Authority (LPA) responsible for making decisions to guide where sustainable development takes place across the borough of Rugby.

1.2 The key functions of the LPA are:

Plan making (also referred to as planning policy or development strategy) – setting out a future vision for the borough and providing a policy framework for addressing development needs, including housing, economic, social and environmental priorities and needs. The types of policy documents prepared will be outlined in section 2 of this document.

Development management – managing the type, mix and design of development and ensuring it is located in sustainable locations through the approval or refusal of planning applications (and other types of applications).

Why should you get involved in planning?

1.3 Planning has a direct impact on the daily lives of residents and on businesses. It is therefore important that residents, workers and business owners have the opportunity to have their say in planning decisions. We recognize that local knowledge can be extremely valuable, and lead to better planning decisions.

What is a Statement of Community Involvement (SCI)?

1.4 This Statement of Community Involvement (SCI) sets out how Rugby Borough Council (the Local Planning Authority (LPA)) will involve and consult with the community, businesses and stakeholders in plan making and when considering planning applications and proposals. It is designed to improve understanding of how we prepare documents such as the local plan, support neighbourhood planning, and how we consider planning proposals.

1.5 Involvement in plan making, how we will support neighbourhood planning, and involvement in considering planning applications and proposals will be addressed in different chapters of this document.

Why do we need a SCI?

1.6 Local planning authorities are currently required by [Section 18 of the Planning and Compulsory Purchase Act 2004](#) to produce and review a SCI. This SCI updates and replaces the version published in 2024, . SCIs should be updated at least every 5 years.

What are the objectives of the SCI?

1.7 Through the SCI, we aim to set out how we will:

- Enable everyone the chance to be involved in the planning process and make a difference in shaping the place around us.
- Ensure consultation is inclusive, fair and equitable, and supports our communities and stakeholders in feeling heard.
- Use consistent consultation methods, whilst recognising benefits of new and emerging methods, including the use of digital technology.
- Use the methods of consultation identified as a minimum, whilst aspiring to exceed those minima.
- Set out how and when you can engage with and have your say on planning policy documents, such as the local plan.
- Set out how we will support neighbourhood planning.
- Set out how and when you can engage in the consideration of planning applications.
- Be accountable in decision making by explaining how consultation responses will be considered, and how you and others may be kept informed.

2. COMMUNITY INVOLVEMENT IN PLAN MAKING

What is a Development Plan?

- 2.1 The development plan is the overarching term for local planning policy framework, which must set out strategic priorities for the area along with policies to deliver them, as well as other non-strategic (more detailed) policies. By law, planning decisions (i.e. on planning applications and proposals) must be taken in line with the development plan, unless other material considerations indicate otherwise.
- 2.2 The National Planning Policy Framework (NPPF) allows flexibility for the development plan to comprise of one or more documents. In Rugby Borough, the development plan is currently comprised of multiple documents, as neighbourhood plans form part of the development plan.
- 2.3 The different types of planning policy documents which may be included in the development plan are defined below. In addition, there are other planning policy documents which are not formally part of the development plan, but which are material considerations in decision making. These too will be identified below.

Local Plan

- 2.4 The local plan is a key part of the development plan for Rugby Borough. It sets out the vision and strategic priorities for the area, and strategic policies designed to achieve the vision. It also contains policies on more detailed (non-strategic) matters. For example, the local plan sets out the amount of development that should take place, the number of jobs and homes that need to be created, where development should take place, and how it should be designed. It also identifies the infrastructure needed to accompany development.
- 2.5 Up to date information on the local plan is available on the Council's [‘Development Strategy’](#) webpages.

Other Development Plan Documents

- 2.6 Other Development Plan Documents (DPD) are produced much the same way as a local plan and are afforded the same weight in decision making. They can address a particular policy subject not addressed in the local plan and may include development allocations. For example, neighbouring authorities have adopted, or are developing DPDs on topics such as net zero buildings, houses in multiple occupation and employment land.
- 2.7 Rugby does not currently have any other DPDs.

Neighbourhood Plans

- 2.8 Neighbourhood planning is not a legal requirement. It is a right that communities can choose to exercise. Neighbourhood plans are led and produced by communities to shape the

places in which they live and work. A neighbourhood plan is often led and conducted by a parish council, but in unparished areas may be prepared by a Neighbourhood Forum established for neighbourhood planning purposes. Once ‘made’ (adopted), neighbourhood plans become part of the development plan and are a material consideration in determining planning applications within the neighbourhood area.

- 2.9 Rugby Borough Council has a duty to support the preparation of neighbourhood plans. It also has responsibilities for parts of the neighbourhood plan-making process.

Supplementary Planning Documents (SPDs)

- 2.10 A local plan or other development plan document may be supported by Supplementary Planning Documents (SPDs). These provide additional information on the implementation of development plan policies. This could be in relation to the design and/or other requirements of a specific site, such as South West Rugby, or it could be more thematic, such as the Shop Front Design Guide SPD, or the Climate Change and Sustainable Design and Construction SPD.
- 2.11 SPDs are not subject to independent examination (as local plans, other DPDs and neighbourhood plans are), and do not form part of the development plan. They are however, capable of being material considerations when relevant planning applications are decided.

Design Codes

- 2.12 Design Codes are a set of rules for the design of new development, that should be concise, measurable, and illustrated where possible. The use of design codes is now encouraged by government.
- 2.13 Rugby Borough has adopted a design code for development at South West Rugby in the form of a Supplementary Planning Document (SPD) (the ‘South West Rugby Design Code SPD’) Any Design Codes produced in a similar way by the Council will be subject to the consultation provisions of this SCI relating to SPDs. However, the specific nature of design codes means that the degree and nature of engagement at the earliest stages may be additional to some other SPDs, and will seek as far as possible to align with the process outlined in the [National Model Design Code](#).

When and how will we involve communities in plan making?

- 2.14 The nature of public consultation and other involvement will vary according to the type of policy document under preparation, and the scope of its content. Further detail follows in respect of different document types below, and the methods outlined should be considered the minimum. We will aspire to exceed these minimum methods of engagement. We will seek to use a variety of communication techniques, including utilising the latest available technology where this may help reach a wider audience.

How you can sign up to be kept informed

- 2.15 If you would like to be directly informed of plan making consultations you can sign up to the Development Strategy Consultation database by:

- Submitting a request via email to: localplan@rugby.gov.uk
-

2.16 Providing your contact details for the database (preferably email contact), means we can notify you directly when any planning policy consultations start. We will notify persons registered on the database on the date the consultation commences.

2.17 Anyone who no longer wants to be notified of such consultations can opt out of the database by email using the same email address above.

Involvement in the preparation of the Local Plan (or other Development Plan Documents (DPDs))

2.18 The statutory process for preparing a local plan or other development plan document is set out in [the Town and Country Planning \(England\) Regulations 2012](#) (as amended). There are two key stages of consultation during the preparation of a local plan or DPD – Regulation 18 and Regulation 19. The table below (table 1) sets out scope of the methods we will employ to bring the consultations to the attention of communities and other stakeholders.

2.19 The [Local Development Scheme](#) sets out the timetable for the preparation of the local plan and other planning policy documents produced by the LPA. This is reviewed and updated periodically, and will provide the most up to date information on when consultations are likely to take place.

Table 1: Local plan – consultation stages and methods

Stage of Preparation	Minimum duration	Who?	How? Methods of engagement
Public participation (Regulation 18) – <i>this stage may include one or more separate consultations.</i>	6 weeks	Public consultation for all Consultation bodies outlined in appendix 1	Notification to persons registered on the Development Strategy consultation database* (as on the day the consultation commences)
Pre-submission (Regulation 19) – <i>a consultation on the version of the plan the LPA intends to submit to the Planning Inspectorate for independent examination</i>	6 weeks		<p>Notice on RBC's website</p> <p>Press advert in the Rugby Observer and/or Rugby Advertiser</p> <p>Press release</p> <p>Advertisement on RBC's social media channels</p> <p>Hard copy consultation documents will be made available at Rugby Town Hall, and in libraries across the borough</p>

Stage of Preparation	Minimum duration	Who?	How? Methods of engagement
			Public consultation events which may include in-person and/or virtual sessions. Details to be advertised on the Council's webpage and social media channels.

*See paragraphs 2.15-2.17

2.20 Following the consultation stages outlined in table 1, the Council will submit the local plan and any representations received in response to the Regulation 19 consultation to the Secretary of State. The submitted local plan and representations will then be considered by a Planning Inspector in an independent examination. The examination of the local plan usually takes place in public, and any objectors or persons who have expressed a wish to speak, will be contacted by the Planning Inspectorate.

2.21 As part of the Examination process, there may be further public consultations, for example in respect of 'main modifications' to the plan. We will utilise the methods outlined in table 1 to advertise these, though they may not include public consultation events.

Neighbourhood Plans

2.22 Neighbourhood planning is a community-led process (see paragraph 2.8). However, as the LPA, we have a duty to support neighbourhood planning, and undertake public consultations as part of this process. Section 3 of this document sets out how the LPA will support and assist parish councils and neighbourhood forums beyond the formal consultation stages set out here below.

2.23 . Table 2 below sets out the key stages of consultation in the neighbourhood plan-making process which are undertaken by the LPA.

Table 2 – Consultations on neighbourhood plans undertaken by the LPA

Consultation Stage	Neighbourhood Planning Regulation(s) (if applicable)	Minimum duration	Who?	How? Methods of consultation
Designating the neighbourhood area (and neighbourhood forum as appropriate)	5A-7	6 weeks if applicable* <i>*Where a proposed neighbourhood area incorporates an entire parish boundary, public consultation is not required</i>	People who live, work or conduct business in the proposed neighbourhood area (where consultation is required)	Publish documents on RBC's website Notify consultees RBC considers may have an interest, with reference to the Development Strategy Consultation database* Social media

Consultation Stage	Neighbourhood Planning Regulation(s) (if applicable)	Minimum duration	Who?	How? Methods of consultation
Designating a Neighbourhood forum (in areas not within a parish)	9-11	6 weeks	People who live, work or conduct business in the proposed neighbourhood area	<p>Publish documents on RBC's website</p> <p>Notify consultees RBC considers may have an interest, with reference to the Development Strategy Consultation database*</p> <p>Social media</p>
Strategic Environmental Assessment & Habitats Regulations Assessment Screening	N/A	5 weeks	Heritage England, Natural England, 3. Environment Agency	Consult statutory bodies by email
Post-submission consultation	16	6 weeks	<p>Statutory and other consultation bodies, including any body referenced in the submitted consultation statement (required by Regulation 15)</p> <p>People who live, work or conduct business in the proposed neighbourhood area (where consultation is required)</p>	<p>Publish documents on RBC's website</p> <p>Notify consultees RBC considers may have an interest</p> <p>Social media</p>
Consideration of Examiner's report and provision of a Decision Statement in consultation with	18	6 weeks	The qualifying body	Notice published on RBC's website

Consultation Stage	Neighbourhood Planning Regulation(s) (if applicable)	Minimum duration	Who?	How? Methods of consultation
the Qualifying Body				
Referendum	19		All registered voters within the neighbourhood area. (The independent examiner can also recommend the referendum applies to an extended area).	Statutory notice of referendum

*See paragraphs 2.15-2.17

2.24 In addition to the above methods, qualifying bodies may be invited to assist in publicising consultations. Assistance from qualifying bodies can be very beneficial in promoting the neighbourhood plan consultations given their local connections and knowledge. For example, qualifying bodies may be able to place information on local notice boards, or share it on local parish or other social media accounts.

Consulting on Supplementary Planning Documents (SPDs)

2.25 The statutory process for preparing SPDs is set out in the Town and Country Planning (Local Planning) England Regulations 2012. SPDs are subject to a single formal stage of consultation – Regulations 12 and 13. Table 3 below sets out the methods for engagement.

2.26 Prior to the formal consultation under Regulations 12 and 13, the LPA may engage with relevant stakeholders (dependent on nature and subject matter of the SPD) and gather evidence. This is particularly the case for the development of design codes, which are addressed separately below.

Table 3 – methods of engagement for a SPD

Stage of Preparation	Minimum duration	Who?	How? Methods of engagement
Regulation 12 & 13	4 weeks	Public consultation for all Statutory Consultation bodies	Notification to persons registered on the Development Strategy consultation database* (as on the day the consultation commences) Notice on the Council's website Press advert in the Rugby Observer and/or Rugby Advertiser Press release

			<p>Advertisement on RBC's social media channels</p> <p>Hard copy consultation documents will be made available at Rugby Town Hall, and in libraries across the borough</p> <p>Public consultation events may be held where these are relevant to the subject and scope of the SPD</p>
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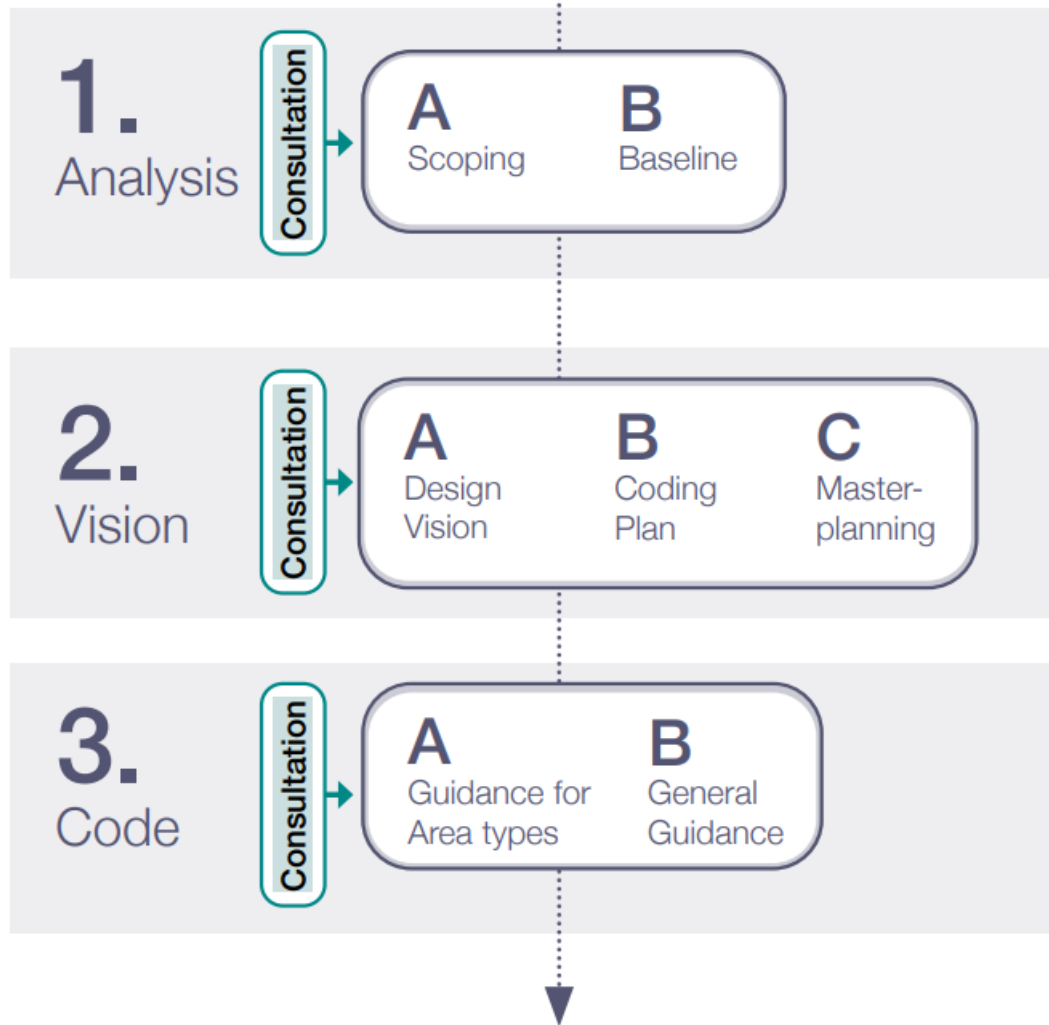
**See paragraphs 2.15-2.17*

Design Codes

2.27 The production of design codes will follow the same minimum consultation arrangements as outlined in table 3 above (for SPDs) once a draft has been completed. However, due to the nature and scope of design codes, additional involvement opportunities are envisaged in the early preparation of these documents.

2.28 The [National Model Design Code](#) sets out a three stage process for the development of design codes, with each stage beginning with consultation (see figure 1 below).

Figure 1. Design Code Process



2.29 We will endeavor to involve communities as outlined in the National Model Design Code, though the scope and nature of the engagement will be designed to reflect the geographical coverage and scope of the design code being prepared. For example, the approach to involvement on a borough-wide design code will necessarily differ from that for a site-specific design code, and will therefore need to be designed as appropriate to each code.

2.30 The types of engagement methods that may be used include:

- Online surveys
- In-person workshops
- Workshops in local schools
- Online workshops

How to have your say on plan making

- 2.31 During formal public consultations, any comments must be made in writing. You can submit comments in writing to:

Email: localplan@rugby.gov.uk

Post: Development Strategy, Rugby Borough Council, Town Hall, Evreux Way, Rugby, CV21 2RR

- 2.32 We are unable to accept anonymous representations. Please include your name and address in your representation. Your representation will be managed in line with our [privacy notice](#).
- 2.33 When submitting written comments via the methods above, please ensure that comments are attributed to the appropriate policy reference or paragraph number to ensure that we can understand which part or parts of the plan or policy content they relate to.
- 2.34 For local plan consultations we will create an online form, offering an additional option to submit written comments. The link to the form will be made available from the consultation webpage.
- 2.35 In other forms of engagement described in this chapter, such as in person events or workshops, officers will explain how feedback will be captured on a case-by-case basis.

What happens to comments you submit?

- 2.36 Comments, known as representations, will be considered as part of the decision-making process. The Council will only assess the planning issues relevant to plan making:
- 2.37 We are unable to accept anonymous representations.
- 2.38 All representations received in response to consultations undertaken by the Council's Development Strategy service as part of the as part of the preparation of local plans, supplementary planning documents, other local development documents, neighbourhood plans or development orders, and other public consultations related to planning policy may be made available for public inspection, so we cannot treat them as confidential. Such representations will be made available for inspection and/or sent to an independent examiner where this is a legal requirement of applicable legislation. In this context, made available means published on the council's website and made available for inspection in hard copy at the council's officers and in such other locations as may be required by applicable regulations (usually libraries). Where there is not a legal requirement to make representations received available for public inspection, the Council may as an alternative to or in addition to making those representations available, summarise the issues they raise in a consultation report. Representations will be managed in line with our privacy notice: <https://rugby.gov.uk/w/privacy#development-strategy>.

3. HOW WE WILL SUPPORT NEIGHBOURHOOD PLANNING

Neighbourhood plans and neighbourhood development orders (NDO)

3.1 Paragraphs 2.8 and 2.9 in section 2 of this document set out what a neighbourhood plan is and specify that it is a community led planning document. In addition, paragraphs 2.19-2.21 set out the consultation role of Rugby Borough Council as the LPA at a number of stages in the neighbourhood planning process, as set out in the [Neighbourhood Planning \(General\) Regulations 2015](#). As well as our role in formal consultation stages outlined above, we (as the LPA) have a duty to support parish councils and neighbourhood forums as they prepare neighbourhood plans. This section of the SCI will set out how we will support neighbourhood planning outside the LPA led consultation stages.

3.2 Neighbourhood development orders (NDOs) grant planning permission for specific developments within a designated neighbourhood area and therefore remove the requirement to submit a planning application for this type of development. To date, no NDOs have been proposed within Rugby Borough. They would be proposed by parish councils or designated neighbourhood forums.

Who leads neighbourhood plan-making?

3.3 Neighbourhood plans are led by a qualifying body. The qualifying body will be a parish council, or a designated neighborhood forum in unparished areas of the borough. We have a duty to support qualifying bodies as they prepare a neighbourhood plan.

Opportunities for engagement in neighbourhood planning

3.4 Neighbourhood planning is designed to be community-led, in a focused local area. As such, there should be plenty of opportunity to engage with the neighbourhood plan process where you live or work. Much of this engagement will be led by the qualifying body (either a parish council or designated neighbourhood forum) to inform the scope and content of the plan and will be outside of the formal consultation stages.

3.5 There are formal stages of the plan-making process where consultation will occur. The LPA is also responsible for consultation at some of these stages, as outlined in section 2 of this SCI.

How will we support neighbourhood planning?

3.6 RBC has a template Service Level Agreement (SLA) (see appendix 2) for the preparation of neighbourhood plans. The SLA sets out in detail the support we will offer to a qualifying body throughout the neighbourhood plan-making process. It is envisaged that the template SLA will be agreed and signed between the Council and the qualifying body at the beginning of the production process of a neighbourhood plan, in order that roles and responsibilities are clearly defined and understood.

3.7 In summary, the key ways we will support qualifying bodies include:

- Sharing relevant data and evidence, including planning application records and monitoring information, mapped constraints, and relevant information from the borough's evidence base
- Provide Ordnance Survey base maps for the neighbourhood area
- Provide up to date information on the local plan
- Direct qualifying bodies to any available grant funding or technical support which may be available
- Advise on methods for community engagement
- Provide feedback on drafts of the neighbourhood plan and associated documents
- Advise on screening and the need for Strategic Environmental Assessment and Habitat Regulation Assessment
- Advise on conformity matters – for example with national policy and the strategic policies of the local plan
- Assist in digitising final policy maps

4. INVOLVEMENT IN CONSIDERING PLANNING APPLICATIONS AND PROPOSALS

4.1 A planning application is a means by which someone applies for permission from Rugby Borough Council (RBC) (as the LPA) to develop land or buildings. We receive a wide range of planning applications for formal determination, from simple house extensions to large scale commercial or residential development proposals. RBC also determines other types of applications, including those relating to works requiring Advertisement Consent, and Listed Building Consent. Many of these types of applications require publicity, and in some cases public consultation.

4.2 [The Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#) sets out the minimum standards of publicity and notification to the local community for different types of application. This section explains how applications related to planning are dealt with, and outlines the consultation arrangements.

4.3 There are four key stages to a planning application process as outlined in table 4.

Table 4 – planning process

Stage of process	Explanation
Pre-application	In this stage, an applicant or developer prepares their proposal. Early engagement with the LPA, local stakeholders and the community are strongly encouraged at this stage, so that feedback can help shape the proposal. This is especially important for large and complex proposals.
Planning application	The applicant submits a formal planning application to the LPA for consideration. The LPA consults on the application submitted as applicable.
Decision making	Taking account of feedback from stakeholders and the community, and following officer assessment against planning policies, a decision is taken on the application by either a committee of elected councillors or by a delegated officer.
Appeal	An applicant has the right to appeal against the decision of the LPA if it has taken the decision to refuse the planning application or against a condition that has been imposed on a planning permission.

4.4 The information that should be submitted as part of a planning application is set out within the local [Validation Checklist - Rugby Borough Council](#)

Pre-application process

Community and stakeholder engagement

4.5 The Localism Act 2011 introduced a duty for developers to consult local communities before submitting a planning application for certain types of development. For developments that fall outside of the requirements of the Localism Act, we strongly encourage pre-application consultation by applicants.

4.6 The benefits of pre-application community and stakeholder engagement include:

- Highlighting issues and concerns early, with increased potential to be able to address them
- Proposals have the opportunity to better reflect community aspirations at the point of application – raising the quality of development
- In light of the above, there may be fewer objections at planning application stage
- This can speed up the application process to determination

Pre-application planning advice

4.7 Applicants and developers can request advice from planning officers at pre-application stage. This enables planning officers to give advice on proposals, including the identification of issues or opportunities, or the need for additional expert advice on any aspects of the proposals. Pre-application discussions are always confidential for commercial reasons and in no way pre-determine the outcome of any planning application. We introduced a charge for this service in April 2022, and further information can be found on the [pre-application](#) page of our website.

4.8 Pre-application advice can offer the following benefits:

- Save time and resources of the applicant
- Raise the quality of development
- Speed up the planning process
- Reduce the chance of unsuccessful applications
- Identify the need for expert input earlier in the process

Planning application process

4.9 The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires that the local community should have the opportunity to comment on the proposal prior to determination. The level and extent of consultation will vary dependent on the size, nature and location of the proposed development.

How we publicise planning applications

4.10 When a planning application is submitted, there is a statutory minimum consultation period, during which anyone may comment on the application (see table 5). It is the responsibility of the LPA to publicise planning applications. We will do this by:

- Publishing each planning application on [Citizen Portal](#), including key dates, digital plans and supporting information
- Undertake appropriate notification as set out in table 5
- Consult the parish council(s) of the parish in which the application is located
- Consult statutory and non-statutory consultees (see appendix 1)

4.11 Where neighbour notification letters are sent, these will usually be to properties immediately adjacent to the application site. However, an officer may notify additional properties where an application is judged to have potential wider impact.

Table 5 – publicity and consultation for different types of applications

Application type	Consultation period (minimum)	Publicity and notification – minimum requirements
Major development (outline, full and reserved matters)	21 days	Site notice or neighbour notification, press notice in the local newspaper, details on Citizen Portal (accessible via RBC's website), notification of the relevant parish council
Minor development	21 days	Site notice or neighbour notification, details on Citizen Portal (accessible via RBC's website), notification of the relevant parish council
Householder development	21 days	Site notice or neighbour notification, details on Citizen Portal (accessible via RBC's website), notification of the relevant parish council
Applications subject to Environmental Impact Assessment (EIA) and accompanied by an Environmental Statement	30 days	Site notice or neighbour notification, press notice in the local newspaper, details on Citizen Portal (accessible via RBC's website), notification of the relevant parish council
Applications that do not accord with the development plan (known as 'departures')	21 days	Site notice or neighbour notification, press notice in the local newspaper, details on Citizen Portal (accessible via RBC's website), notification of the relevant parish council
Applications affecting a Public Right of Way	21 days	Site notice or neighbour notification, press notice in the local newspaper, details on Citizen Portal (accessible via RBC's website), notification of the relevant parish council
Listed Building Consent and applications affecting the setting of a listed building	21 days	Site notice or neighbour notification, press notice in the local newspaper, details on Citizen Portal (accessible via RBC's website), notification of the relevant parish council
Works to protected trees	N/A	Details on Citizen Portal (accessible via RBC's website). There is no statutory requirement for consulting on these applications.

Applications related to advertisements	21 days	Details on Citizen Portal (accessible via RBC's website)
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Applications that won't be publicised

4.12 There is no statutory obligation to consult on the following types of applications:

- Certificate of Lawfulness for a proposed use or development
- Certificate of Lawfulness of existing use or development
- Approval of details/discharge of conditions
- Non-material amendments
- Some types of prior approval applications

How to have your say on a planning application

4.13 RBC makes all applications and decisions available to view online through the [Citizen Portal](#).

4.14 You can make comments on any application during the consultation period. There is a statutory consultation period for any planning application which is set out in table 5. Representations made after the consultation period may be considered up to the date of the decision, but we strongly advise that comments are submitted within the consultation period.

4.15 You can submit your comments directly via the Citizen Portal. Alternatively, you can submit comments in writing to:

- **Email:** rbc.planning@rugby.gov.uk
- **Post:** Development Management, Rugby Borough Council, Town Hall, Evreux Way, Rugby, CV21 2RR

What happens to comments you submit?

4.16 Comments, known as representations, will be considered as part of the decision-making process. The Council will only assess the planning issues relevant to the proposal. The lists below give an indication of issues that can and cannot be taken into account.

4.17 Planning issues include:

- Compliance with approved planning policies
- Character of the area
- Loss of light
- Loss of privacy
- Noise and disturbance from the proposal
- Traffic generation and access
- Impact on the rural landscape

4.18 Planning issues do not include:

- Impact on property values
- Boundary or other legal disputes
- Loss of view
- Restrictive covenants
- Competition between traders
- Possible damage to properties caused by building work
- Access for maintenance

4.19 All representations received must be made available for public inspection, and as such we are unable to treat them as confidential. Representations will be added to the application file, though only representations from Parish Councils and organisations are published online on Citizen Portal. All representations will be published in accordance with our [Privacy Notice](#).

4.20 We assess each planning application on their own individual merits against national planning policies and local policies in the development plan, including the local plan and neighbourhood plans. SPDs may also be a material consideration in the decision-making process. Applications are determined in accordance with the development plan, unless material considerations indicate otherwise.

4.21 If you have submitted a representation on a planning application, you can also apply to speak at the meeting of the planning committee if the application is being presented to a committee (see below).

What happens if an application is amended after the consultation and before it is determined?

4.22 In deciding whether further notification and consultation is necessary in instances where amendments to an application are made, we will consider the criteria set out in the government's Planning Practice Guidance. Where it is considered appropriate or necessary to reconsult, a further period of 10-14 days will be appropriate in most cases.

4.23 Where re-consultation occurs, representations can be made in the same ways outlined in paragraph 4.15, and comments will be considered as set out above.

Decision Making process

4.24 Decisions on planning applications are made by:

- Planning Committee – comprised of elected councillors
- Planning Officers under delegated powers – this enables officers to determine some planning applications without needing a decision from planning committee
- The Planning Inspectorate/Secretary of State – where an applicant lodges an appeal.

4.25 The [Council's Constitution](#) sets out which applications are likely to be considered by Planning Committee.

Planning Committee

- 4.26 Agendas and reports for Planning Committee are made public at least 5 working days before the meeting on the Council's Planning Committee [webpage](#).
- 4.27 The committee meetings are minuted and recorded via YouTube. Minutes and YouTube recordings are available via the Council's [Planning Committee webpage](#).
- 4.28 Anyone who makes a representation on a planning application, can apply to speak at the meeting of the Planning Committee where that application is to be determined. To speak at Planning Committee to express your views on a planning application, you must register in advance. The Council selects speakers on a first come, first served basis.
- 4.29 The Council has published a '[Guide to public speaking at planning committee](#)', which provides useful information.

Post decision

- 4.30 Once an application has been determined, a copy of the decision notice will be:
- Sent to the applicant or their appointed agent
 - Published on [Citizen Portal](#) as part of the application documentation
- 4.31 All reports that have been considered in reaching the decision will also be published as part of the application documentation on [Citizen Portal](#).

Planning Appeals

- 4.32 An applicant may appeal to the Planning Inspectorate for the following reasons:
- Against a decision to refuse planning permission
 - To contest any of the conditions imposed on a decision to grant planning permission
 - Against non-determination of an application (i.e. where the LPA has not reached a decision)
- 4.33 Only the applicant has the right to appeal.
- 4.34 The Planning Inspectorate will consider the appeal, and make the final decision on the proposal. It will make the appeal decision available on the Planning Inspectorate website.
- 4.35 We will support the appeals process by:
- Adding all appeals documentation to the application file on [Citizen Portal](#)
 - Notifying all third parties who made representations on the planning application
 - Adding the appeal decision to the application file at the end of the process
- 4.36 There are three types of planning appeal:
- **Written representations** – the appeal is conducted in writing only. This format is usually used for small scale planning proposals.
 - **Public hearing** – a relatively informal public session, which is usually concluded in a day.

- **Public inquiry** – a formal public process, reserved for the largest and most complex planning appeals. This usually involves multiple sessions.

4.37 The Planning Inspectorate publish a [Planning Appeals: Procedural Guide](#) which offers further information on how appeals work and opportunities to participate.

Planning Enforcement

4.38 The [Planning Enforcement Local Plan](#) sets out what constitutes a breach of planning control, and the processes and actions which will be undertaken when a complaint is received regarding a breach of planning control.

4.39 You can report a planning breach via the council's [webpage](#), or by emailing RBC.planningenforcement@rugby.gov.uk. A summary of the information that should be provided is included in the Planning Enforcement Local Plan, which also identifies stages of the process when a complainant is informed.

5. MONITORING AND REVIEW

- 5.1 This SCI is based upon current national planning policy and legislation. As required by the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), we are committed to reviewing the SCI at least every 5 years from the point of adoption to ensure it remains up to date and reflective of current legislation and best practice.
- 5.2 Should significant changes be made to national legislation which impact all or parts of this SCI, we will endeavor to update the document as soon as possible.

6. GLOSSARY

Term	Abbreviation	Definition
Citizen Portal	-	The name of the portal through which planning and other applications can be reviewed online (via the Council's website)
Design Code	-	A set of simple, concise, and illustrated design requirements that are visual and numerical wherever possible to provide specific and detailed design parameters
Development Management	DM	Managing the type, mix and design of development and ensuring it is located in sustainable locations through the approval or refusal of planning applications (and other types of applications)
Development Plan	-	Includes the local plan, neighbourhood plans and any other spatial development strategies produced by the local authority.
Development Plan Documents	DPD	Documents that make up the Development Plan
Development Strategy	-	The name of the team responsible at the Council for plan making/the production of planning policy documents, and supporting neighbourhood planning
Environmental Impact Assessment	EIA	The assessment of the environmental consequences of a plan, policy, or development project prior to the decision to move forward.
Environmental Statement	ES	Sets out the likely environmental effects of a proposal.
Full planning application	-	An application with comprehensive details about all aspects of the development proposal
Habitats Regulation Assessment	HRA	An assessment of the consequences of a plan, policy or development project on sites protected by Habitats Regulations, including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)
Listed Building Consent	LBC	Required for works to a listed building
Local Development Scheme	LDS	A project plan which outlines the timetable for the production of planning documents
Local Planning Authority	LPA	A local government body (in this case RBC) empowered by law to undertake planning functions in a specific area.
Major development	-	Residential development of 10 or more dwellings or on a site area of 0.5ha or more. Employment development of 1000sqm floorspace or development on a site area of 1ha or more. It also includes mineral extraction and waste development.
Material Planning Consideration	-	Matters which legislation and the courts have determined should be taken into account in deciding an application.

Term	Abbreviation	Definition
Minor development	-	Residential development between 1-9 dwellings. Employment development of less than 1000sqm floorspace or on a site less than 1 ha.
Neighbourhood Development Order	NDO	A form of deemed local planning permission ; it grants outline or full planning permission in a particular neighbourhood area for the development specified in the order, which may be either a particular project or a particular class of development.
National Model Design Code	NMDC	A document produced at a national level to guide the creation of design codes across the country.
National Planning Policy Framework	NPPF	The government's planning policy for England.
Neighbourhood Forum	-	A group that can be designated for the purposes of producing a neighbourhood plan, where the area is not parished.
Non-material consideration	-	Matters which should not be taken into account in deciding a planning application.
Outline planning application	-	An application which seeks consent for the principle of a development proposal, but not comprehensive detail. Details which do not form part of the outline determination are referred to as 'reserved matters'.
Pre-application	-	The stage prior to submission of a planning application.
Qualifying Body	QB	The body responsible for producing a neighbourhood plan. In parished areas the qualifying body will be the parish council. In areas with no parish council, a neighbourhood forum may be designated.
Representation	Rep	The name given to any comments and views received in writing in respect of a planning or other type of application.
Reserved matters planning application	-	Outline planning consent does not include comprehensive detail of all matters related to a development proposal. The details not determined in the outline application are 'reserved matters' and these are subject to a further application once an outline application is approved.
Rugby Borough Council	RBC	The local government organisation for the borough of Rugby.
Statutory consultee	-	Planning law prescribes circumstances where local planning authorities are required to consult specified bodies prior to a decision being made on an application. These are statutory consultees.
Strategic Environmental Assessment	SEA	A systematic process for identifying, reporting, and proposing mitigation measures and monitoring the environmental effects of plans, programmes and proposals.
Statement of Community Involvement	SCI	A document that sets out how the LPA will engage and consult with the community on the development of

Term	Abbreviation	Definition
		planning policy and on planning and other applications.
Supplementary Planning Document	SPD	A document which expands in more detail on policy within a local plan or other development plan document.
Validation checklist	-	A list of document requirements needed to be supplied as part of a planning application for it to be deemed a 'valid' application.

APPENDIX 1 – Consultation bodies for plan (policy) making

The [Town and Country Planning \(Local Plan\) \(England\) Regulations 2012](#), define ‘general’ and ‘specific’ consultation bodies that a local planning authority must engage with during the preparation of planning policy documents.

The Regulations allow the councils to select ‘such of’ the ‘specific’ and ‘general’ consultation bodies that may have an interest and/or the LPA consider appropriate to the consultation document being prepared.

The organizations that we will consult will be drawn from the list in this appendix, and will be dependent on the nature of the consultation being undertaken, taking account of:

1. The area the document covers
2. The subject matter of the document

Specific Consultation bodies

Specific Consultation bodies are defined in the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\)](#), Part 1:

- The Coal Authority
- The Environment Agency
- The Historic Buildings and Monuments Commission for England (known as Historic England)
- The Marine Management Organisation
- Natural England
- Network Rail Infrastructure Ltd
- The Highway Agency (known as Highways England)
- Relevant authority any part of which adjoins the local planning authority’s area
 - A. Local planning authorities
(*Coventry City Council, Harborough District Council, Nuneaton and Bedworth Borough Council, Stratford on Avon District Council, Warwick District Council, West Northamptonshire Council*)
 - B. County Council
(*Warwickshire County Council, Leicestershire County Council, Northamptonshire (now West Northamptonshire)*)
 - C. Parish Council
 - D. Local Policing Body
- Any person –
 - i. To whom the electronic communications code applies by virtue of a direction given under 106(3)(a) of the Communications Act 2003, and
 - ii. Who owns or controls electronic communications apparatus situated in any part of the local planning authority’s area
- If it exercises functions in any part of the local planning authority’s area-
 - i. A Primary Care Trust established under section 18 of the National Health Service Act 2006 (g) or continued in existence by virtue of that section
 - ii. A person to whom a licence has been granted under Section 6(1)(b) or (c) of the Electricity Act 1989(h)

- iii. A person to whom a licence has been granted under section 7(2) of the Gas Act 1986 (a)
- iv. A sewage undertaker
- v. A water undertaker
- The Homes and Communities Agency (now known as Homes England); and
- Where the Local Planning Authority is a London Borough Council, the Mayor of London (not applicable in Rugby)

General consultation bodies

Consultation bodies are defined in the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\)](#), Part 1:

- Voluntary bodies, the activities of which benefit any part of the borough
- Bodies which represent the interests of different racial, ethnic or national groups in the borough
- Bodies which represent the interests of different religious groups in the borough
- Bodies which represent the interests of disabled persons within the borough
- Bodies which represent the interests of persons carrying out business in the borough
- Consultees relating to health

Duty to Cooperate bodies

The Duty to Cooperate Bodies are defined in the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012, Part 2, Regulation 4](#) as follows:

- The Environment Agency
- The Historic Buildings and Monuments Commission for England (known as Historic England)
- Natural England
- The Mayor of London (not applicable in Rugby Borough)
- The Civil Aviation Authority
- The Homes and Communities Agency (now known as Homes England)
- Each Integrated Care Board established under section 14D of the National Health Service Act 2006 (formerly known as Clinical Commissioning Groups)
- The National Health Service Commissioning Board
- The Office of Rail Regulation (known as Office for Rail and Road)
- Transport for London (not applicable for Rugby Borough)
- The Local Highway Authority (Warwickshire County Council, and neighbouring highway authorities as applicable)
- The Marine Management Organisation

In accordance with Planning Practice Guidance (PPG), Rugby Borough Council and other public bodies subject to the duty must cooperate with Local Enterprise Partnerships and Local Nature Partnerships and have regard to their activities where relevant to plan-making.

Development Strategy Consultation Database

The Council will refer to the Development Strategy Consultation database for consultation bodies which fall within the categories outlined above. We aim to ensure that the database is kept as up to date as possible, however if any bodies or organizations want to be added to this

database, removed from the database, or alter existing details in the database, they should email localplan@rugby.gov.uk.

APPENDIX 2 – template SLA for neighbourhood planning



**Neighbourhood Planning
Draft Service Level Agreement
Rugby Borough Council and ***Parish Council/Neighbourhood
Forum
2024**

Purpose

1.1 The Localism Act 2011("The Act") and the Neighbourhood Planning (General) Regulations 2012 (637) ("The Regulations") set out the framework for the preparation and bringing into force of a Neighbourhood Development Plan ("NDP").

1.2 Under the provisions of the Act, Rugby Borough Council ("The Borough Council") (as the Local Planning Authority) is responsible for:

- fulfilling certain statutory requirements
- the provision of appropriate advice and assistance

1.3 The purpose of this agreement is to set out how Rugby Borough Council will fulfil its statutory obligations and level of assistance to parish councils engaged in the production of a NDP. This agreement will also define the role of the qualifying body. A qualifying body may be:

- a parish or town council
- a neighbourhood forum

Memorandum of Agreement:

This Agreement is between:-

a) The Borough Council

Signature of Chief Officer – Growth and Investment

.....

Date.....

and

b) **XXX Parish Council/Neighbourhood Forum** (the Qualifying Body)

Signature of chairperson of the qualifying body

.....

Date.....

2. Date and duration of agreement

1. This agreement will commence once the document has been signed and dated by the selected representatives of both parties.

2. It is anticipated that the full process for bringing the said NDP into force will take, as a minimum, some 24-36 months from the date of designation. The Borough Council and the qualifying body will review progress on the NDP at intervals of approximately every 6 months from the date of the agreement.

3. Working Relationships

3.1 The parties to this agreement seek:

- i. A constructive working relationship
- ii. to work closely together at all levels, both in policy, and in strategic issues of importance
- iii. to respect each other's views, and, where different, after discussion, to ensure proper understanding of the reasons for such differences
- iv. to have a 'no surprises' policy, based on notifying each other well in advance, where possible, of significant announcements and developments in policy or changes to the timetable
- v. to minimise duplication of activity wherever possible
- vi. to inform other stakeholders about the relationship so as to reduce uncertainty

4. Respective Responsibilities

The statutory obligations of Rugby Borough Council

- 4.1 Following completion of the statutory procedures for designation of the Neighbourhood Area, the Borough Council will undertake the following in accordance with its duties set out in the Act and the Regulations:

	Stage	Timescales
1	Confirm that the pre-submission Neighbourhood Plan meets the general requirements of the Localism Act and provide detailed comments on the plan as a consultee during the pre-submission public consultation (Regulation 14)	Within the prescribed consultation period unless an extension has been agreed with the qualifying body
2	Confirmation that the submitted Neighbourhood Plan and other associated documentation meets the requirements of the Localism Act (Regulation 15) and the Public Sector Bodies (Website and Mobile Applications) (No.2) Accessibility Regulations 2018	Within two weeks of the submission of all relevant documentation to the Council
3	Publicise the submission plan and other associated documentation (Regulation 16)	Within two weeks following confirmation by the Borough Council that the submission documents meet the requirements of the Localism Act and the Public Sector Bodies (Website and Mobile Applications) (No.2) Accessibility Regulations 2018
4	In consultation with the qualifying body, approval of the appointment of an	Within 2 weeks of the close of consultation (regulation 16)

	examiner with the Parish Council (Regulation 17), including the drafting of a contract with the appointed examiner	
5	Forward all comments received on the submission plan along with all other required documentation to the appointed examiner (Regulation 17)	Within 2 weeks of an Examiner being appointed
6	Consideration of Examiner's report and provision of a Decision Statement in consultation with the Qualifying Body (Regulation 18)	Within 6 weeks of receiving the Examiner's report the Council will issue a decision statement on whether it agrees with the findings of the examiner's report and approval to proceed to referendum
7	In liaison with the qualifying body, make arrangements for the referendum	Following the issuing of the Decision Statement the referendum process will begin. Eight weeks is allowed for this process which includes a 6 week notification period
8	'Make' the Neighbourhood Plan (Regulation 19 & 20)	As soon as practically possible after a positive referendum

2. It should be expected that the statutory process from regulation 15 (submission of draft plan) to the plan being made (stages 2 to 8 above) will cover a period of a minimum of 8 months.

3. Whilst the Council will seek to meet the above timescales, it should be noted that events and circumstances may arise which could impact on the ability of the Council to meet these timescales, for example local or national elections and associated purdah periods. The Council will inform the qualifying body at the earliest opportunity when it becomes aware that there may be an issue which could affect the ability of the Council to meet these timescales.

2. The Borough Council will provide the following advice and assistance

Published Advice

1. Provide on its website: [Neighbourhood planning - Rugby Borough Council](http://www.rugby.gov.uk/neighbourhood-planning) (www.rugby.gov.uk/neighbourhood-planning)

- A simple guide on the stages required for preparing a NDP
- A map illustrating the Parish Council Boundaries

Professional Advice

2. The first point of contact for advice and technical support is [REDACTED]
Telephone [REDACTED] Email [REDACTED]

Initial Meeting

3. At the request of the qualifying body and following designation of the Neighbourhood Area the support officer will attend a meeting and provide an overview on the procedures and issues. The advice will cover:

- i. The legal procedures related to neighbourhood planning
- ii. Project plan and timescales for the production of a plan
- iii. Relationship with the Rugby Borough Local Plan and related planning policy documents
- iv. Methods of consultation and engagement
- v. Consultation with the 'specific' consultees
- vi. The requirements of other legislation such as Human Rights Act, the Habitats Regulations and Strategic Environmental Assessment
- vii. Support available from other organisations such as the Warwickshire Rural Community Council

Background Data and Evidence

4. The Borough Council will make available:
- i. Authority Monitoring report data for the last 5 years
 - ii. List of planning applications made in the Neighbourhood Area for the last 5 years
 - iii. The Local Plan Evidence Base and access to base data
 - iv. Maps showing constraints data
 - v. Up to date information on any grant funding and technical support available

Professional advice and assistance

5. The Borough Council will provide the following level of officer support:
- i. Attendance at 1 meeting (up to 2 hours) every three months
 - ii. 6 hours per calendar month to undertake tasks iii), iv) and v) set out immediately below:
 - iii. The Council will provide advice (and/or direct to the appropriate source) on:
 - Methods of community engagement and consultation
 - Potential delivery partners
 - Conformity matters
 - Up to date information on the Local Plan
 - Advice on any requirement for Environmental Assessment and Habitats Regulation Assessment
 - Emerging drafts of the NDP
 - Links to research data
 - iv. For the Pre-submission draft NDP the Borough Council will provide advice and assistance on:
 - Conformity of the plan with local and national policy and relevant national guidance and whether in their view it meets the basic conditions
 - Suitability of the Consultation Statement
 - Suitability of any Environmental Assessment or Habitats Regulations Assessments undertaken
 - Conformity with other legislative requirements

- v. The Borough Council will provide:
 - Electronic copies of OS base maps for the area
 - Digitising of final proposals maps

6. The Borough Council will aim to respond to all queries within 10 working days. Where a query is particularly complex and/or may take longer than 10 working days to respond to we will endeavour to provide an indicative timescale for a full response.

The Borough Council will not offer advice or assistance in the following areas:

- i. Drafting the NDP and supporting documents
- ii. Undertaking survey/research work
- iii. Undertaking Strategic Environmental Assessment or Habitats Regulation Assessment
- iv. Undertaking non- statutory consultation exercises
- v. Project management services
- vi. Attending every meeting
- vii. Attending every consultation event
- viii. Direct financial support
- ix. Printing of documents unless related to the statutory requirements of the Borough Council.

5. Qualifying Body Responsibilities

- i. Establish a steering group to develop the NDP with clear terms of reference.
- ii. Arrange an initial meeting which the Borough Council support officer can attend and advise the steering group.
- iii. Produce a project plan including a timetable for the production of the plan. This will be submitted to, and agreed with the Council. The qualifying body will inform and seek agreement with the Borough Council on updates to the timetable.
- iv. Provide regular updates on progress against the project plan and timetable to the Borough Council via the support officer.
- v. Convene as a group on a regular basis throughout the period of preparation of the NDP and its examination.
- vi. Commit adequate resources to the task.
- vii. Provide to the Borough Council the Draft Submission Plan and supporting documents in accessible electronic format.
- viii. Provide results of primary source data which would be helpful to the Borough Council.
- ix. To ensure that documents to be made available on public websites comply with the Public Sector Bodies (Website and Mobile Applications) (No.2) Accessibility Regulations 2018 in terms of being accessible to people who have a disability.

Qualifying Body first point of contact

Name.....

Contact details

Telephone.....

Email.....

APPENDIX 8

Proposed amendments to the adopted Statement of Community Involvement (SCI)

Page reference	Paragraph no.	Proposed Change	Reason
3	1.6	<p>State that updated SCI would replace the 2024 version and delete reference to previous versions of the SCI:</p> <p>“Local planning authorities are currently required by Section 18 of the Planning and Compulsory Purchase Act 2004 to produce and review a SCI. This SCI updates and replaces the version published in 202419, which was amended in 2020 to enable ongoing consultation in line with Covid 19 protocols. SCIs should be updated at least every 5 years.”</p>	To reflect the replacement of the most recently adopted version. Reference to versions previous to that are not required.
5	2.5	<p>Delete reference to the ‘current local plan review’ and ‘emerging local plan’. Refer only to the local plan, and update hyperlink to the general ‘development strategy’ webpages:</p> <p>“The local plan is in the process of being revised. Up to date information on the emerging local plan is available on the Council’s ‘Development Strategy’ webpages local plan review webpage.”</p>	For clarity, as this situation is changing. The hyperlink in the 2024 version links to the ‘Issues and Options’ information which has been superseded, and linking to the Development Strategy webpages will ensure access to the most up to date information into the future.
6	2.13	<p>Update reference to the South West Rugby Design Code SPD, which was in production at the time of drafting the 2024 version:</p> <p>“Rugby Borough has adopted a design code for development at South West Rugby in the form of a Supplementary Planning Document (SPD) (the ‘South West Rugby Design Code SPD’) A design code is under preparation for South West Rugby at the time of writing. It is intended that this will become an SPD, and it is likely that any future design codes Rugby Borough Council prepares will also become SPDs. Any Design Codes produced in a similar way by the Council will therefore be subject to all the consultation information in provisions of this SCI relating to SPDs”</p>	The South West Rugby Design Code SPD has been adopted since the production of the 2024 SCI.

APPENDIX 8

Page reference	Paragraph no.	Proposed Change	Reason
7	2.15	<p>Delete reference to and hyperlink to the online form to register on the consultation database:</p> <p>“</p> <ul style="list-style-type: none"> Using the online form on our website: Local plan review – Rugby Borough Council “ 	The form has moved during the course of local plan consultations so the link is no longer relevant. It is likely to be relocated again so it is neater to remove this link from the document.
7/8	Table 1	<p>1st column – delete reference to and dates of Regulation 18 consultations undertaken as part of the local plan review:</p> <p>“Public participation (Regulation 18) – this stage may include one or more separate consultations. The ‘Issues and Options’ consultation took place between October 2023–February 2024. Another consultation under Regulation 18 is anticipated and will set out the ‘preferred options’.”</p>	The relevance of this information will diminish and date the document over time.
7/8	Table 1	<p>4th column (methods of engagement) delete reference to specific social media channels – e.g. Facebook and X:</p> <p>“Advertisement on RBC’s social media channels, including Facebook, and X (formerly Twitter)”</p>	The Council no longer uses ‘X’ and social media channels may be subject to further change in future. General reference to social media channels would therefore allow flexibility for such changes.
8	2.23	<p>Insert ‘(General)’ in the Neighbourhood Planning Regulations 2012. Hyperlink unchanged:</p> <p>“The statutory process for the preparation of a neighbourhood plan is set out in the Neighbourhood Planning (General) Regulations 2012 as amended”</p>	Neighbourhood Planning (General) Regulations 2012 is the correct reference.
11	Table 3	<p>4th column (methods of engagement) delete reference to specific social media channels – e.g. Facebook and X:</p> <p>“Advertisement on RBC’s social media channels, including Facebook, and X (formerly Twitter)”</p>	The Council no longer uses ‘X’ and social media channels may be subject to further change in future. General reference to social media channels would therefore allow flexibility for such changes.

APPENDIX 8

Page reference	Paragraph no.	Proposed Change	Reason
13	2.38	<p>Amend paragraph as follows:</p> <p>“</p> <p>2.1 All representations received in response to consultations undertaken by the Council’s Development Strategy service as part of the as part of the preparation of local plans, supplementary planning documents, other local development documents, neighbourhood plans or development orders, and other public consultations related to planning policy maymust be made available for public inspection, so we cannot treat them as confidential. Such representations will be made available for inspection and/or sent to an independent examiner where this is a legal requirement of applicable legislation. In this context, made available means published on the council’s website and made available for inspection in hard copy at the council’s officers and in such other locations as may be required by applicable regulations (usually libraries). Where there is not a legal requirement to make representations received available for public inspection, the Council may as an alternative to or in addition to making those representations available, summarise the issues they raise in a consultation report. Representations will be managed in line with our privacy notice. “</p>	For clarity and to align with the privacy notice.

Rugby Borough Council

Climate Change and Environmental Impact Assessment

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action.

Rugby Borough Council declared a climate emergency in 2019 and the Council's Corporate Strategy (2021-2024) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions are further defined through the Council's Climate Change Strategy [link](#) and must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes greenhouse gas emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

To help you complete this assessment, please see the following guidance on SharePoint [here](#).

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to your Chief Officer for approval.

If you require help, advice and support to complete the form, please contact your Chief Officer.

SECTION 1: OVERVIEW

Portfolio and Service Area	Growth and Investment, Development Strategy
Policy/Service/Change being assessed	Proposed Submission Rugby Borough Local Plan 2025-2042
Is this a new or existing Policy/Service/Change?	New policy
If existing policy/service please state date of last assessment	N/A
Ward Specific Impacts	All wards
Summary of assessment Briefly summarise the policy/service/change and potential impacts	The local plan seeks to advance an ambitious climate and nature agenda through its policies and site allocations. Overall, the impacts should be positive on wider climate change strategy objectives. Wider Sustainability Appraisal of the plan and Habitats Regulations Assessment are included as appendices 3 and 4 to the cabinet report.
Completed By	Neil Holly
Authorised By	Nicola Smith
Date of Assessment	10 December 2025

SECTION 2: GREENHOUSE GAS EMISSIONS

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Scope 1 Emissions Direct emissions from council owned resources, for example through boilers or vehicles.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No impact on council owned resources			
Scope 2 Emissions Indirect emissions occurring at the location energy is produced for council activities. For example, electricity generation for council buildings.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No impact on the production of energy for council activities			

SECTION 3: CLIMATE CHANGE STRATEGY

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Workplaces and the Economy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan includes an ambitious net zero policy for new buildings.	N/A		
Transport	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan includes new housing employment land to be developed in the period to 2042. Locations were selected for the access to services and facilities or (in the case of employment land) workforce. This should have a significant beneficial effect ahead of not putting a plan in place.	N/A		
Natural Environment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan includes requirements for 20% canopy cover for new major development, delivery of biodiversity net gain close to development sites and for the allocation of significant new public open space/country parks. This should have an overall positive impact in comparison to not putting a plan in place. There will be negative impacts of the quantum of development	N/A		

Appendix 9

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
				proposed but the council does not have the choice to pursue lower scales of new development.			
Homes and Energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan includes an ambitious net zero policy for new buildings. Locations that are potentially suitable for renewable energy development are identified in the plan.			
Waste, Resources and the Circular Economy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste and minerals planning are 'county matters' and the responsibility of Warwickshire County Council.			
Climate and Nature Positive Communities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Overall the climate and nature policies should support climate positive new and existing communities.			
Adaptation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	New policy moves adaption principles form the existing SPD into policy to give them more weight.			

SECTION 4: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	At plan adoption in 2027 (date to be confirmed)
Key points to be considered through review	Outcome of the Regulation 19 public consultation and examination process which could lead to amendments to proposed policies.
Person responsible for review	Neil Holly
Authorised by	Nicola Smith

Appendix 10 Communications Plan – Local Plan Preferred Options Consultation

Key Messages

The key messages to be communicated:

1. Explaining the nature of the Regulation 19 consultation, the grounds on which residents can respond (legal compliance and soundness) and the lack of scope for further amendments to the plan by the council
2. How to respond
3. What the development strategy is and how it has been arrived at (including changes from the preferred options stage)

Communication

The table below outlines key elements of the communications plan for the consultation on the Proposed Submission Plan.

Key messages 1 and 2 will transcend across the range of communication methods, and follow both relevant statutory requirements and the commitments in the Statement of Community Involvement (SCI).

Key message 3 will be the focus of the video, and any materials produced to support events. They will also form part of the overall social media strategy.

Communication type	Objective of communication	Medium	When?	Notes
Consultation launch and general awareness				
Press release	General awareness that consultation is happening	RBC website Local media (print and online)	At beginning of consultation	Development Strategy to liaise with communications team
Press notice	General awareness that consultation is happening	Rugby Observer	w/c 26 January	
Emails and letters to the Development Strategy Consultation database	General awareness of the consultation to those who have registered interest and to statutory bodies	Emails Letters	At the beginning of the consultation – 26 January	

Communication type	Objective of communication	Medium	When?	Notes
RBC web pages	<p>To provide information on the consultation, including:</p> <ul style="list-style-type: none"> • The Submission Plan • How to respond to the consultation (including response pro forma – see below) • Links to evidence base documents • FAQs • Schedule of events (see below) • Video (see below) 	RBC website	To be maintained throughout the consultation period and beyond	Upload of information discussed with communications officers
Consultation response template (format set out by the Planning Inspectorate for this stage of plan-making)	At this stage of plan preparation, feedback is invited in relation to the legal compliance and soundness of the plan. The template should be used to guide and limit feedback to these matters.	<p>RBC website</p> <p>Hard copies at deposit points</p>	To remain available throughout the consultation	Format specified by the Planning Inspectorate.
Social media	<p>Sharing key information throughout the consultation to seek to engage local residents, including (amongst other things):</p> <ul style="list-style-type: none"> • Consultation launch • Animated video – the development strategy (see below) • Advertising events/event reminders 		A social media strategy and schedule is in development. Posts will be made throughout the consultation.	Social media plan in preparation.
Video (animated)	To succinctly (circa 2-3 minutes maximum) summarise key changes	<p>RBC website</p> <p>RBC Social media</p>	To be uploaded to the website at the beginning of	Scripted by Development Strategy and animation

Communication type	Objective of communication	Medium	When?	Notes
	since the last consultation (using the key diagram).		the consultation and shared on social media	arranged by Communications team.
Hard copy access	In line with the requirements of the SCI, hard copies of consultation information to be supplied to local libraries and the Town Hall. This provides an alternative to online material.	Print	To be placed in these locations ahead of the consultation.	Dunchurch library is closed on Mondays. Wolston library is open 10.30-1 on Fridays and 2.30-5 on Mondays.
Events				
All RBC Councillor briefing	Briefing to councillors	In person	Pre-consultation briefing to be held on 16 December, further briefing will be held at the start of the consultation period if deemed necessary following discussion with group leaders.	
Parish Council briefing	Briefing for representatives of all parish councils in the borough	In person	tbc	Venue tbc – likely Benn Hall
In person sessions hosted by officers in locations across the borough	To allow local residents to pose questions and find out more about the content of the Proposed Submission Local Plan. This aims to help residents make informed consultation responses.	In person	Locations to be agreed by Portfolio Holder and Chief Officer – dates and times to be arranged.	
Advertising events				
Posters	To advertise in person events – dates, times, locations	Print Social media	At the beginning of the consultation period	The use of posters (both physically and via social media) proved very effective in previous consultations.

Communication type	Objective of communication	Medium	When?	Notes
Facebook events	To create the in person drop in events as 'Facebook events', to further promote them to local residents. It may also assist in gauging the level of interest in the event.	Social media	When scheduled	Communications team has used this approach before, and are exploring the best way(s) to share the events – potentially based on a local geography &/or by sharing the event into known local community groups.

AGENDA MANAGEMENT SHEET

Report Title:	Rugby Central Supplementary Planning Document Consultation
Name of Committee:	Cabinet
Date of Meeting:	6 January 2026
Report Director:	Chief Officer - Growth and Investment
Portfolio:	Growth and Investment, Digital and Communications
Ward Relevance:	Benn, Eastlands and New Bilton
Prior Consultation:	Town Centre Regeneration Working Group
Contact Officer:	Ella Casey, Principal Planning Officer (Town Centre Regeneration), ella.casey@rugby.gov.uk
Public or Private:	Public
Report Subject to Call-In:	No
Report En-Bloc:	Yes
Forward Plan:	Yes
Corporate Priorities:	<p>This report relates to the following priority(ies):</p> <p><input checked="" type="checkbox"/> A Healthier Rugby – To support people to live healthier, longer, and more independent lives.</p> <p><input checked="" type="checkbox"/> A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.</p> <p><input checked="" type="checkbox"/> A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.</p> <p><input checked="" type="checkbox"/> A Fairer Rugby – To reduce inequalities and improve housing across the Borough.</p> <p>Corporate Strategy 2025-2035</p> <p><input type="checkbox"/> This report does not specifically relate to any Council priorities but</p>
Summary:	The report recommends that the draft Rugby Central Supplementary Planning Document be approved for public consultation.
Financial Implications:	The costs of the consultation will be limited to the cost of the press notice and postages. These will be met from the existing Development Strategy budget.

Risk Management/Health and Safety Implications:	There are no health and safety implications.
Environmental Implications:	Environmental implications are set out in Appendix 2.
Legal Implications:	Under Regulations 12, 13 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) before a local planning authority can adopt a supplementary planning document it must hold at least four weeks public consultation.
Equality and Diversity:	Equality and Diversity implications are set out in Appendix 3.
Options:	<p>Option 1 – Cabinet approves the Rugby Central Supplementary Planning Document for public consultation.</p> <p>Option 2 – Cabinet does not approve the Rugby Central Supplementary Planning Document for public consultation.</p>
Recommendation:	<ol style="list-style-type: none"> 1. The Rugby Central Supplementary Planning Document (Appendix 1 to this report) be approved for four weeks public consultation in accordance with Regulations 12, 13 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (as amended); and 2. delegated authority be given to the Chief Officer for Growth and Investment to make minor amendments, as necessary to the document before it is published for public consultation.
Reasons for Recommendation:	To ensure high quality design and placemaking within the town centre in order to realise the development and investment opportunities in the town centre.

Cabinet - 6 January 2026

Rugby Central Supplementary Planning Document Consultation

Public Report of the Chief Officer - Growth and Investment

Recommendation

- (1) The Rugby Central Supplementary Planning Document (Appendix 1 to this report) be approved for four weeks public consultation in accordance with Regulations 12, 13 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (as amended);
- (2) Delegated authority be given to the Chief Officer for Growth and Investment to make minor amendments, as necessary, to the document before it is published for public consultation.

1. EXECUTIVE SUMMARY

- 1.1 A draft Rugby Central Supplementary Planning Document (SPD) has been produced. The purpose of the SPD is to guide the future redevelopment of the site and ensure a high quality design and enhanced public realm on the largest catalytic site in the town centre.
- 1.2 The reports seeks Cabinet's approval to undertake a 4 week public consultation on the document. Following completion of the public consultation, and any appropriate amendments made as a result of feedback, it is proposed that the updated SPD will be reported to Council for adoption.

2. INTRODUCTION

- 2.1. It is the role of Supplementary Planning Documents to support and provide further detailed guidance on local plan policies. They are also a material planning consideration in decision making. Policy TC1 of the Local Plan (2011-31) requires proposals for the redevelopment and refurbishment of the existing natural and built environment within the town centre to demonstrate high quality design that complements and enhances the existing environment in a manner which contributes to local distinctiveness and sense of place.
- 2.2. The enhancement of Rugby Town Centre is key priority for the Council and Policy TC1 seeks to ensure that any changes improve the town centre, adding to its vitality and vibrancy. The shopping centre is the largest site in the town centre which has the potential to be redeveloped for a mix of different uses including, commercial, residential, leisure and community uses.

- 2.3. The proposed Rugby Central SPD does not seek to replicate or alter the existing adopted policy but to add design and placemaking principles and parameters to promote high quality design on an integral site within the town centre. This is part of the Council's wider ambitions to take back control of the town and deliver real change for the benefit of existing businesses and residents. Any redevelopment of the site would have regard to existing businesses who are important stakeholders in this proposed transformation.
- 2.4. The SPD would provide guidance to future owners when considering redevelopment options as well as a framework for officers and decision makers in considering planning proposals.

3. RUGBY CENTRAL SPD

- 3.1. The Rugby Central SPD sets out a range of requirements and principles to guide development on the shopping centre site. The document has been prepared by the Council following a comprehensive analysis of the site to determine the options for the site and preferred approach to the development.
- 3.2. The SPD once adopted would become a material consideration in the determination of planning applications. There is an existing planning approval on the northern part of the site (R22/0657) which has been taken into account in the production of this SPD. The SPD would however have the potential to influence further development across the whole site.

4. NEXT STEPS – PROPOSED CONSULTATION ON THE SPD

- 4.1. The SPD must be produced in accordance with the applicable regulations, namely The Town and Country Planning (Local Planning) (England) Regulation 2012 (as amended) for it to have weight in decision making.
- 4.2. Accordingly, it is proposed that a four-week public consultation is held. The draft SPD is attached as appendix 1.
- 4.3. A notice of the consultation will be published in the Rugby Observer and Rugby Advertiser and copies of the consultation documents will be made available on the Council's website and in the following locations:
- Rugby Borough Council's offices, Town Hall, Evreux Way, Rugby, CV12 2RR,
 - Rugby Library and Information Centre, Little Elbow Street, Rugby, CV21 3BZ
- 4.4. Notice of the consultation will be sent to all of those individuals and organisations registered on the Council's planning policy consultation database on the date the consultation commences. The consultation is to be scheduled following the May elections.
- 4.5. Following completion of the public consultation, it is proposed that an amended SPD will be brought to Council to be adopted.

Name of Meeting: Cabinet

Date of Meeting: 6 January 2026

Subject Matter: Rugby Central Supplementary Planning Document

Originating Department: Growth and Investment

DO ANY BACKGROUND PAPERS APPLY ☐ YES ☒ NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

☐ Exempt information is contained in the following documents:

Doc No Relevant Paragraph of Schedule 12A

Rugby Central Development Brief

Supplementary Planning Document

Appendix 1



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1. Purpose of the development brief

Purpose

- 1.1 This Development Brief has been prepared by Rugby Borough Council as the Local Planning Authority to facilitate and guide the development and delivery of the Rugby Central Shopping Centre.
- 1.2 Policy TC1 of the Local Plan (2011-31) seeks for proposals for the redevelopment and refurbishment of the existing natural and built environment within the town centre to demonstrate high quality design that complements and enhances the existing environment and townscape in a manner which contributes to local distinctiveness and a sense of place.
- 1.3 The enhancement of Rugby Town Centre is vital and Policy TC1 seeks to ensure that any changes improve the town centre, adding to its vitality and vibrancy. The shopping centre is the largest catalytic site in the town centre which has the potential for redevelopment.
- 1.4 The Council are currently preparing a new Local Plan which seeks to support the revival of Rugby town centre. Draft policy C1 (Regulation 18 consultation) sets out that development within the town centre will include the redevelopment of Rugby Central Shopping Centre to

restore street-based, mixed-use development. The purpose of this document is therefore to provide more detailed guidance in relation to the redevelopment of the site to ensure high quality development comes forward.

Scope and Status of the Brief

- 1.5 The Development Brief will be adopted by the Council as a Supplementary Planning Document (SPD). This document will sit alongside the Development Plan, and other local guidance such as the Climate Change and Sustainable Design and Construction SPD (2023) and Shopfronts Design Guide SPD (2024) to ensure high quality design and appropriate development is brought forward on this site.

Methodology

- 1.6 This document has been prepared by Rugby Borough Council. Comprehensive analysis of the site (including economic feasibility) was undertaken in order to determine the options for the site and preferred approach to development.

This brief will be subject to a period of public consultation in order to be adopted as a supplementary planning document which can be afforded weight in decision making.

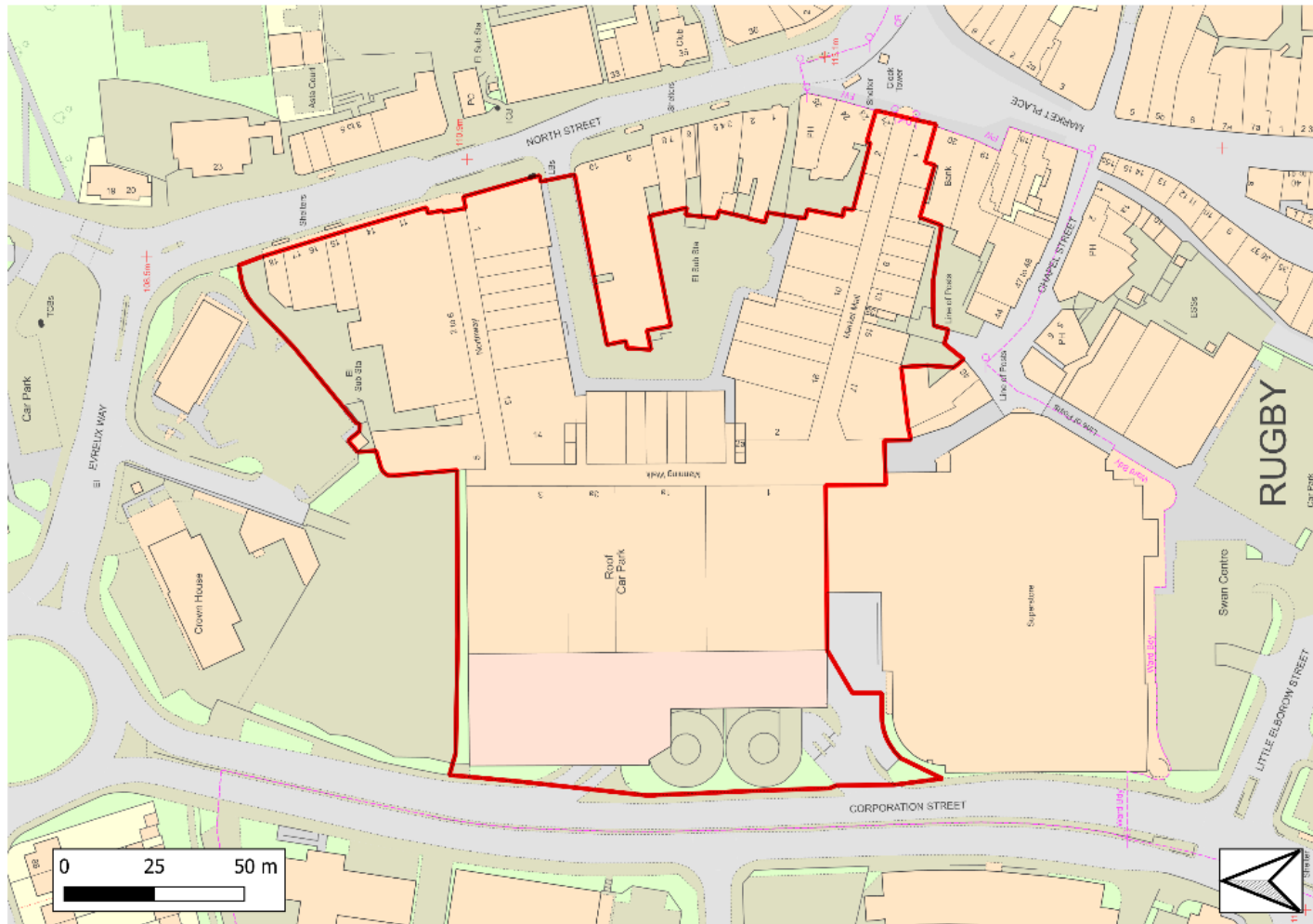


Figure 1: Scope area of the development brief

2. Policy Context

Introduction

2.1 This chapter of the SPD provides an overview of relevant national and local planning policy and guidance. With regard to local policy, the commentary summarises the adopted policy, but has due regard for emerging policy, which will have increased relevance during the lifetime of this SPD.

Planning Policy and Guidance

3.1 The site is covered by policies in the National Planning Policy Framework and Rugby's Local Development Plan. Proposals for the site should take account of any national and local planning policies that apply to the site and its environs.

2.2. Appendix 1 contains a list of relevant local policies for the site.

Other Material Considerations

2.3. Other material considerations are listed below (not exhaustive):

- Rugby Corporate Strategy (2025-2035)
- Rugby Regeneration Strategy (2022)
- Rugby Local Plan – preferred option consultation version (March 2025)

- Local Transport Plan (2011-2026)
- Rugby Public Realm Masterplan (2025)

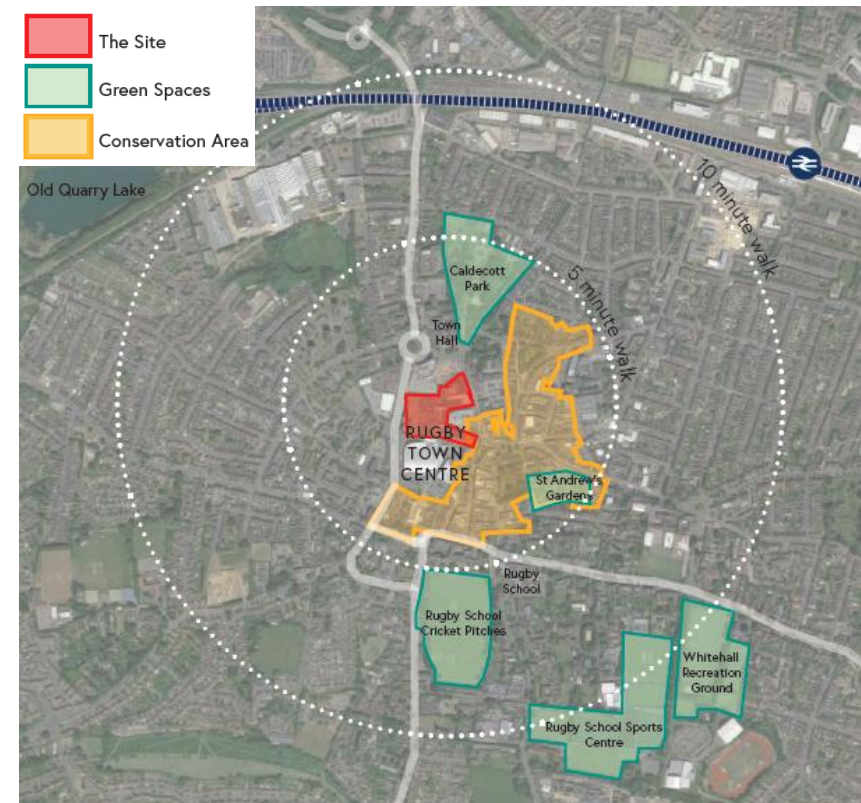


Figure 2: Context Plan

3.Site Information

Site Description

- 3.2. Rugby Central (formerly known as The Clock Tower Shopping Centre) is a c.210,000 sqft covered shopping centre in Rugby Town Centre constructed in c.1980 and last refurbished in 1994. It covers a 2.18 hectare site in rugby town centre. The shopping centre has a mezzanine floor and associated 535 space multi storey car park.
- 3.3. The site has pedestrian entrances on North Street, Market Place and within the Swan Centre and a vehicular entrance off Corporation Street. Servicing is through the Corporation Street car park access and within the service yard to the rear of the current NatWest building on North Street.
- 3.4. In recent years the site (freehold) has been marketed for sale. As of November 2025, 35 of 65 units (54%) in the



Figure 3: Google Earth of site

centre are vacant (this includes all units within North Mall). Due to this the shopping centre has limited footfall and is not contributing as it should be to Rugby's economic vibrancy.

- 3.5. The surroundings of the site are predominately commercial as shown within the site analysis. The character is a historic market town.

Site Analysis (including planning designations)

- 3.6. The site is currently within retail use class (class E formerly class A1) and has an ancillary multi-storey car park and service areas.
- 3.7. The site is within flood zone 1 but has medium/high chance of surface water flooding to the east (figure 4).

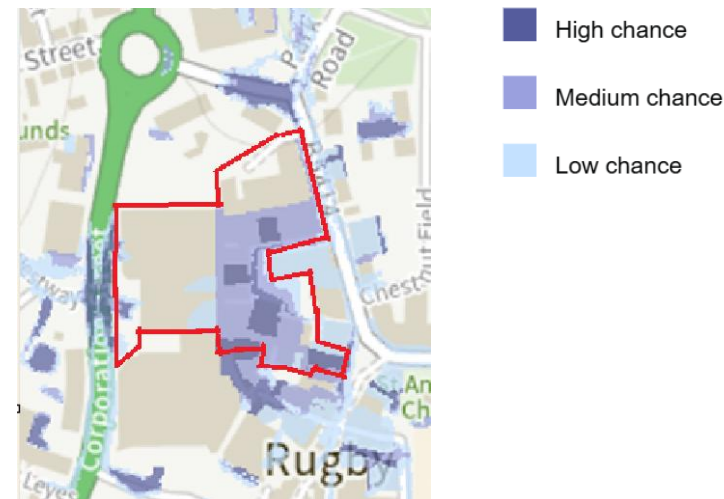


Figure 4: surface water flooding map (source: GOV.UK)



3.8.

Site Analysis (continued)

3.7. The south mall which has an entrance onto Market Place is partially within the Town Centre Conservation Area and 21 Market Place is a Grade II listed building within the site. 20-25 Market Place are all listed buildings within close proximity to the site alongside the Grade II Clocktower. St Andrew's Church is Grade II* listed. There are also a number of important buildings within the immediate vicinity which contribute to the character of the Conservation Area (figure 7). Further detailed information on these historic designations can be found in appendix 2.



3.8. Historic maps show the historic grain of development in rugby town centre (figure 5). Development to the north of the site came forward in the mid-19th century with the shopping centre not being developed until the 1980s. East-west connects are shown to be present in historic development.

3.9. A high-level heritage impact assessment has been undertaken and can be found within appendix 2.

3.10. Figure 6-9 provides all of the remaining site and contextual analysis.

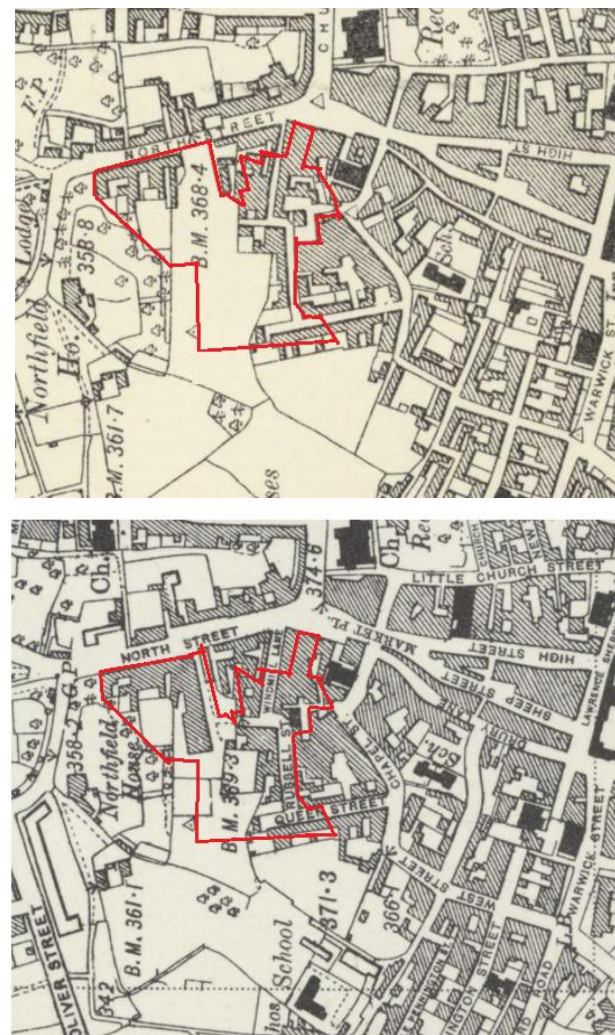
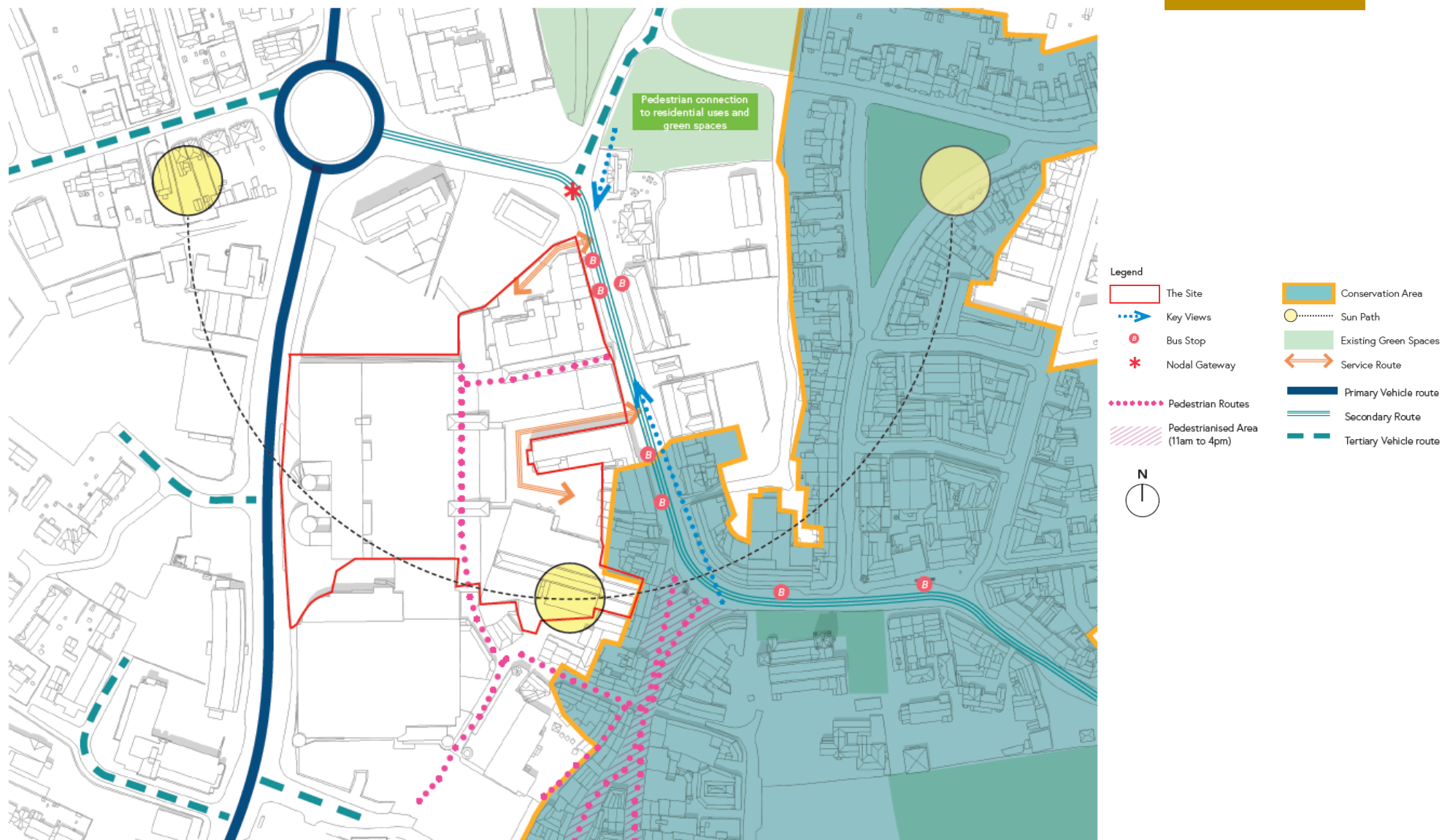


Figure 5: Historic maps of the site – 1905 (top) and 1947 (bottom) (source: National Maps Scotland)



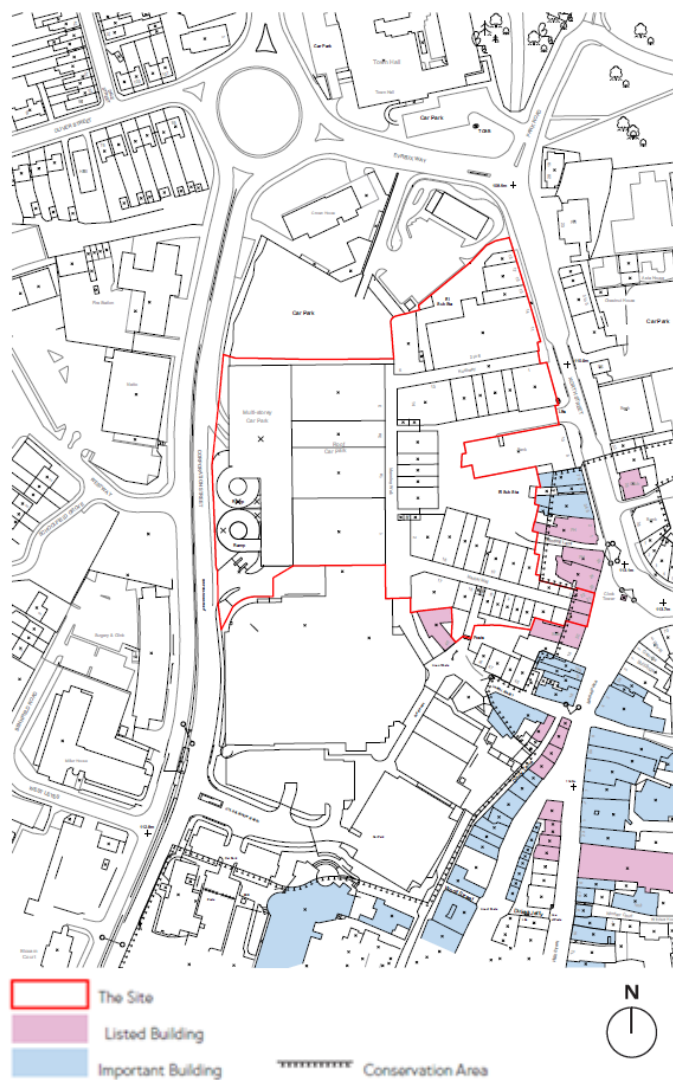


Figure 7: Listed Buildings and Conservation Areas

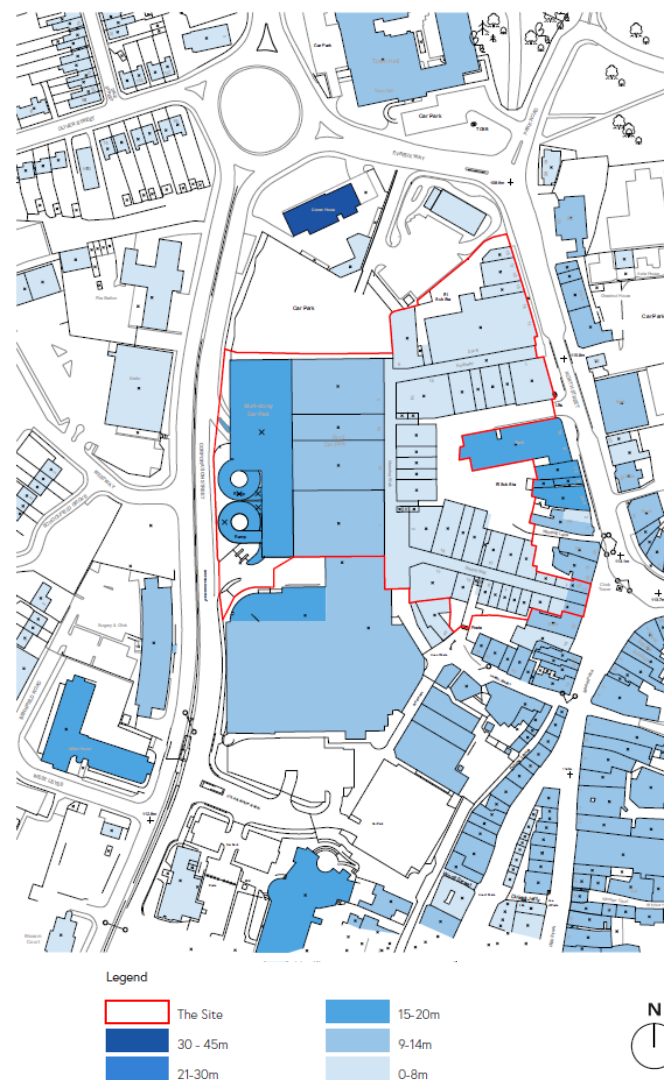


Figure 8: Existing building heights

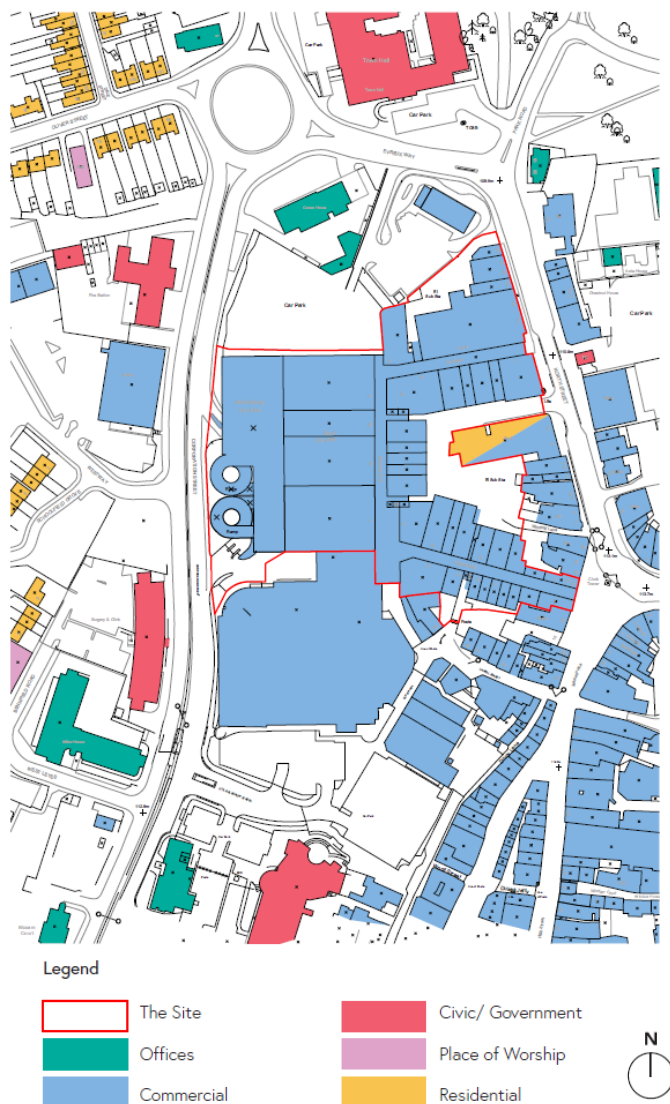


Figure 9: Existing building uses

Existing planning permissions

- 3.2 The area referred to as Northway has planning permission to be demolished and for two 7 storey blocks to be built in its place. The block would consist of commercial space at ground floor level and 200 open market apartments (R22/0657)
- 3.11. The east-west connection and improvements to the public realm alongside a high-quality built environment were key considerations for this planning permission.



Figure 10: Illustration of proposals approved under R22/0657

5. Appropriate Development Responses

Challenges

- 5.1. The sense of arrival into the town from Evreux Way Roundabout onto North Street is underwhelming and lacks 'gateway' quality.
- 5.2. Windsor Street has been degraded over time, with gaps in the urban fabric and traffic impacts.
- 5.3. There are several designated and non-designated heritage assets within the site and its vicinity that have the potential to be affected by its redevelopment. These are potential constraints but also impart a distinct sense of character which will need to be considered in any detailed design.
- 3.3 Due to the size of the site the delivery and phasing needs to be considered carefully Along with how remaining tenants can be accommodated during the constructions phases.
- 5.4. Overlooking from and towards neighbouring buildings and uses will need to be carefully considered.
- 5.5. Reprovision of existing car parking.

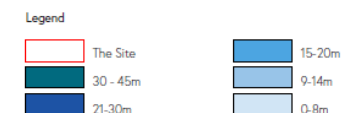
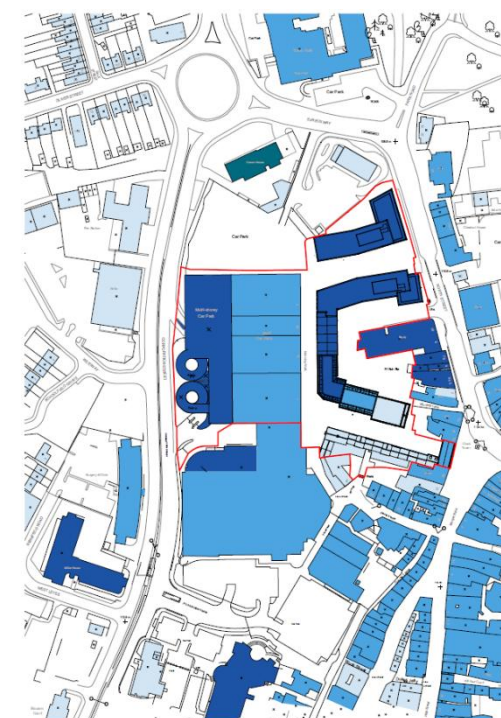
Opportunities

- 5.6. An opportunity to improve the sense of arrival into the town centre especially along North Street where public realm interventions are proposed through the Public Realm Masterplan (2025).
- 3.4 Creation of a new mixed-use destination to rationalise retail within the site and diversify offer (complementary to historic high street) and to improve footfall.
- 3.5 To introduce high-quality design.
- 5.7. Potential to improve connections/active travel and establish a better sense of integration between the different areas of the town centre (east to west).
- 5.8. Potential to improve the quality of the public realm for residents and visitors.
- 5.9. Potential to foster a vibrant mix of complementary uses that will extend and compliment the town centre offer, extend dwell time and tourism spend in the town centre.
- 3.6 Mitigate climate change by introducing landscaping throughout the public realm.

Taking all of the site analysis, challenges and opportunities, an appropriate development response has been derived, and a framework masterplan has been produced.

Framework Masterplan

5.10. The framework masterplan follows placemaking principles set out in the National Design Guide. The masterplan for the site and the proposed building heights is shown below. Key nodes throughout the development are shown overleaf.





KEY:
— Site Boundary
- - - Key Nodes

Objectives

5.11. This SPD provides a positive framework to significantly improve the built form, public realm and connectivity in the town centre. The definitions on this page relate to the key for the framework masterplan and what is expected for each identified element.

5.12. To achieve the vision, successful implementation of the SPD will deliver the following objectives:

- Objective 1: Maximise the regenerative opportunities this site provides by virtue of its location in the town centre.
- Objective 2: Improve access through the site, especially east west connections and also those to the south to improve the linkages to the wider town centre.
- Objective 3: Regenerate an underused and underutilised area of the town centre and improve the built form through the provision of high quality buildings.
- Objective 4: Achieve significant improvements to the public realm (including landscaping and ecological gains) in and around the site to promote walking and visitation.
- Objective 5: Make a positive contribution to the historic context including securing the long-term future of the gateway listed building on Market Place.

DEFINITIONS

Active Frontages

Street frontages or edges that allow a visual or physical engagement between the street users and the ground floors of buildings.

Main Links

Identifies main pedestrian and cycle links required to be provided from each key node.

Key Active Frontages

As above except location within key views and only class E will be allowed unless robust justification is given.

Gateway Building

Buildings which are in visually prominent locations, addressing key routes and spaces. The architectural expression of these buildings will therefore be given particular consideration at the design stage. Proposals should demonstrate how gateway buildings have been designed to reflect their prominence and status. They will demonstrate qualities over and above neighbouring buildings such as distinct architectural form, increased height (in accordance with proposed height ranges) and additional external structure or features.

Key Nodes

Grouping of buildings and public realm which is vital to creating a sense of place.



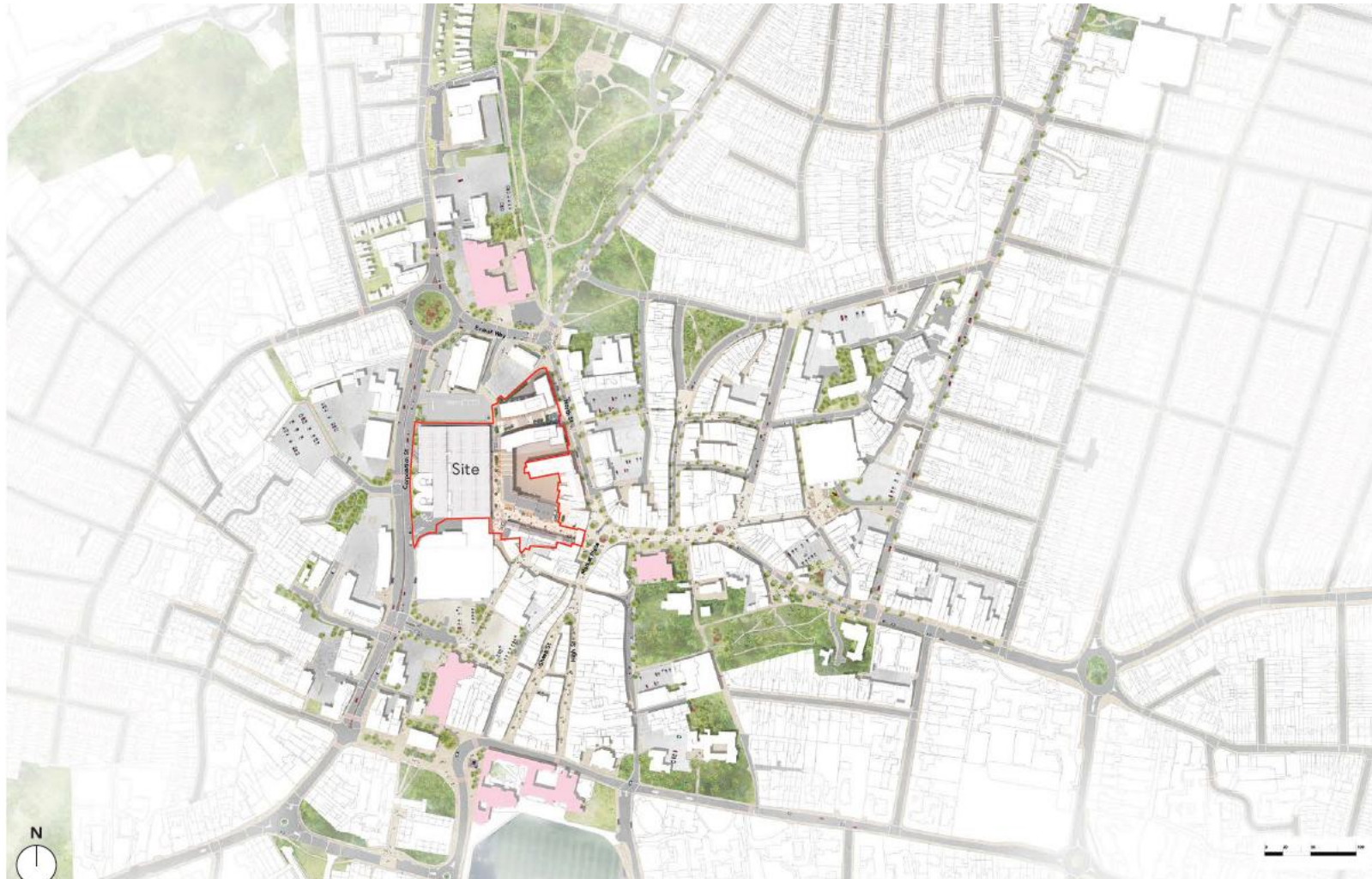
Design Principles

5.13. Relevant planning policies and design codes/guides should be adhered to in relation to the detailed design of this site however design principals have been derived to sit under each objective as follows:



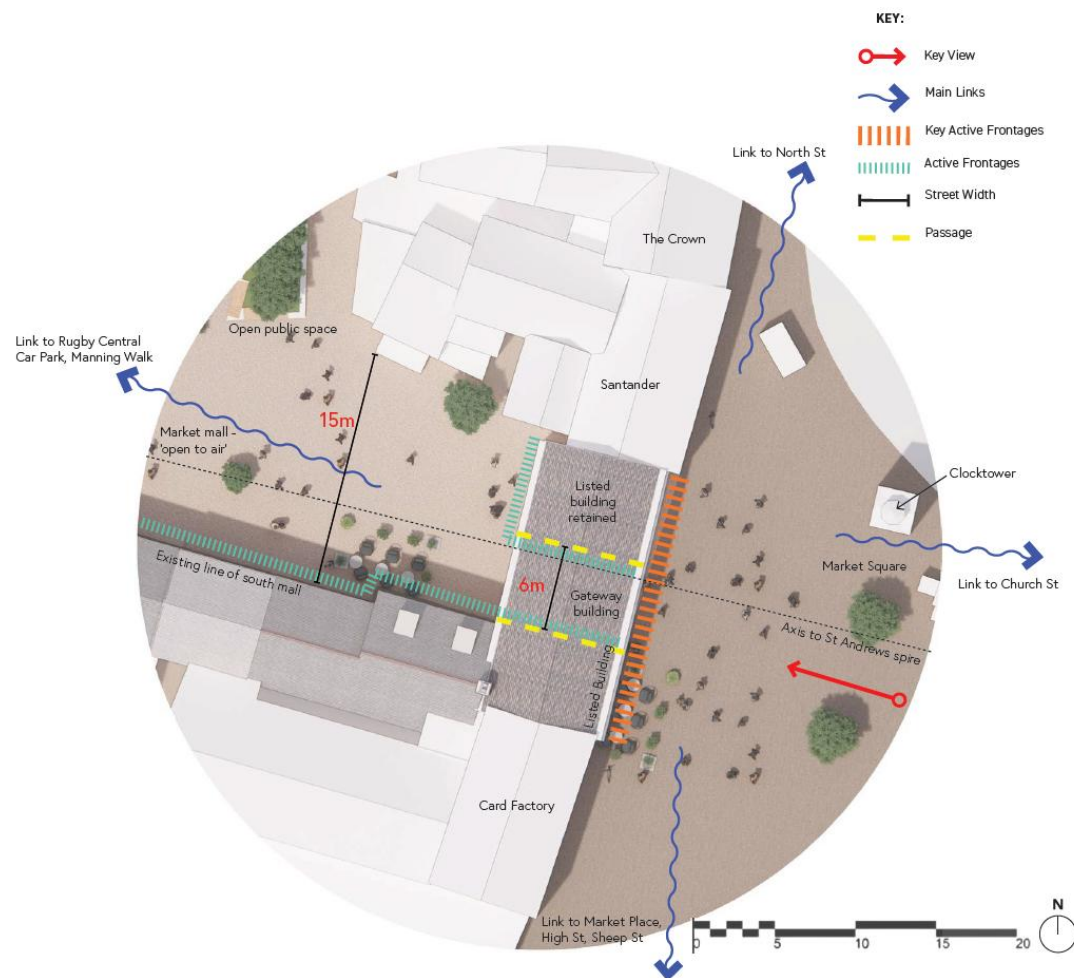
Public Realm Masterplan Integration

5.14. Integration with the Public Realm Masterplan is key to this SPD. This is shown below.



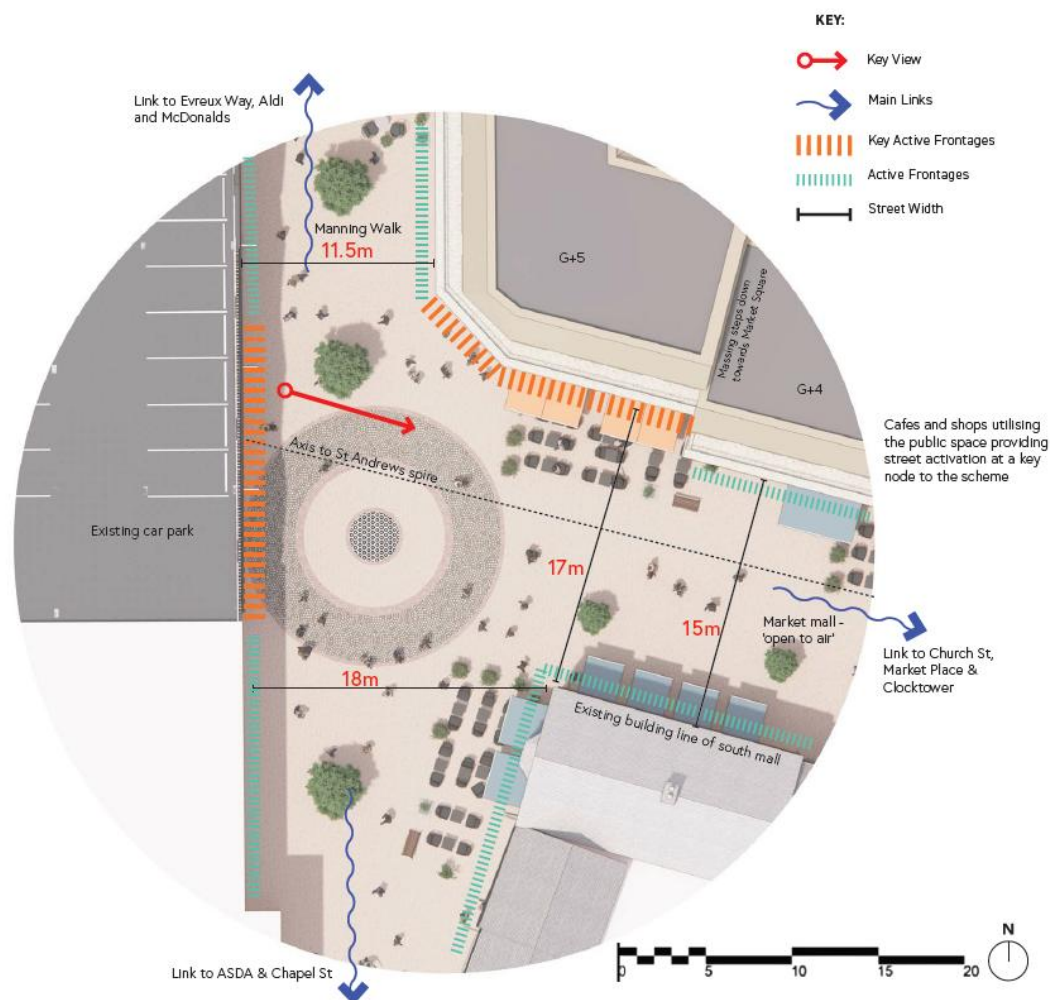
Key Nodes

5.15. **Node 1** is the gateway entrance from Market Place and is framed by a listed building. It focuses the axis along the proposed 'open-to-air' Market Mall. The massing steps down to this key node and is aligned with St Andrew's Church Spire.

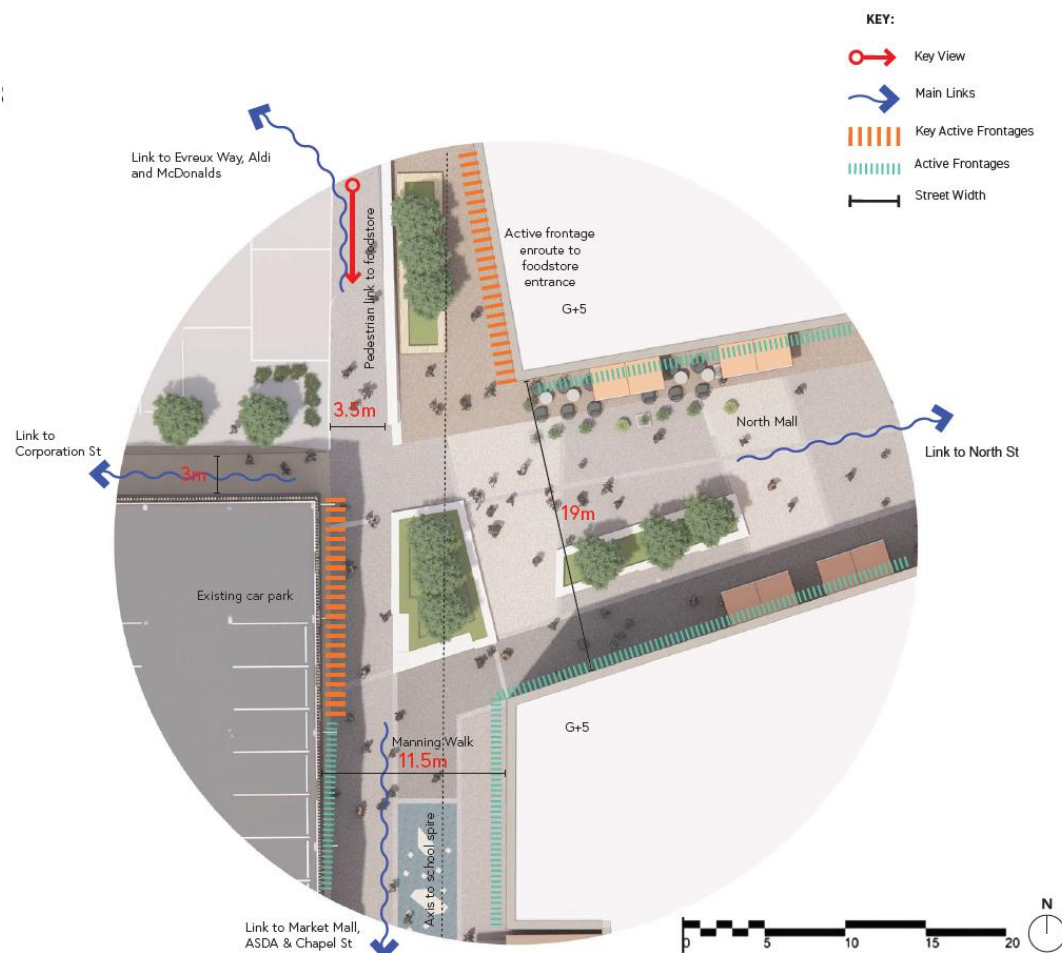


Framing the entrance to the 'Market mall'

5.16. **Node 2** is the heart of the scheme, where Market Mall and Manning Walk meet. A key façade of the existing car park provides the focal backdrop therefore façade improvements are essential in this location. The view from Chapel Street incorporates an identified gateway building. This node is where street trading pitches should be included.



5.17. **Node 3** is the junction between Northway and Manning Walk. This node links to Cemex House and McDonalds for which pedestrian and cycle connections should be provided. Opening Northway further creates a clear axis to the corner of the existing Cemex House car park which then turns to Manning Walk, which is aligned to Rugby School spire.



6. Delivery

How regeneration will be delivered

Rugby Central is a key site within the town centre with significant redevelopment potential. The SPD is to guide that redevelopment.

The framework masterplan, parameters and design principles within it have been devised to focus on the site however key connections are also identified. Adjoining sites therefore must have due regard to providing these connections or links to them.

It is recognised that to deliver redevelopment on this site may require additional public funding.

Relocating existing land uses

As the majority of the site except for south of Manning Walk is shown to be redeveloped with a rationalisation of the ground floor class E units there will be an element of displacement during the delivery of regeneration of this site.

There will therefore need to be a displacement of existing uses plan which will need to cover the different phases of development across the site and consider the potential of temporary units on the site and other vacant units within the town centre.

Indicative Phasing of Development

Phase 1 – Northway development blocks (Planning permission already secured)

Phase 2 – Demolition of east of Manning Walk and north of Market Mall, façade improvements to west of Manning Walk and removal of roof. Introduction of temporary uses within demolition area.

Phase 3 – Development of east of Manning Walk and Market Mall connecting to Market Place.

Phasing Plan:



APPENDIX 1 – Relevant Local Plan Planning Policies

Local Plan

- GP1: Securing Sustainable Development
- GP2: Settlement Hierarchy
- GP3: Previously Developed Land and Conversions
- GP4: Safeguarding Developed Land and Conversions
- DS1: Overall Development Needs
- DS5: Comprehensive Development of Strategic Sites
- H1: Informing Housing Mix
- H2: Affordable Housing Provision
- TC1: Development in Rugby Town Centre
- TC2: Rugby Town Centre – New Retail and Town Centre Uses
- TC3: Primary Shopping Area and Shopping Frontages
- HS1: Healthy, Safe and Inclusive Communities
- HS2: Health Impact Assessments
- HS4: Open Space, Sports Facilities and Recreation
- HS5: Traffic Generation, Air Quality, Noise and Vibration
- NE1: Protecting Designated Biodiversity and Geodiversity Assets
- NE3: Landscape Protection and Enhancement
- SDC1: Sustainable Design
- SDC2: Landscaping
- SDC3: Protecting and Enhancing the Historic Environment
- SDC4: Sustainable Buildings
- SDC5: Flood Risk Management
- SDC6: Sustainable Drainage
- SDC7: Protection of Water Environment and Water Supply
- SDC9: Broadband and Mobile Internet
- D1: Transport
- D2: Parking Facilities
- D3: Infrastructure and Implementation
- D4: Planning Obligations

Supplementary Planning Documents

- Air Quality SPD (2021)
- Climate Change and Sustainable Design and Construction SPD (2023)
- Housing Needs SPD (2012)
- Planning Obligations SPD (2012)
- Shop Fronts SPD (2024)
- Rugby Town Centre Conservation Area Appraisal

APPENDIX 2 – Heritage Information

High-level heritage impact assessment

1. Paragraph 208 of the National Planning Policy Framework sets out that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. This should be taken into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
2. The development brief sets parameters for development but does not go as far as setting out detailed design proposals therefore a high-level heritage impact assessment has been carried out. This assessment has been undertaken based on the five step approach within Historic England's The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (second Edition).

Step 1: Identification of affected heritage assets and their settings

3. The application site itself contains 1 listed building (21&22 Market Place) which is Grade II listed. It is then also within the setting of all the listed buildings within table 1. All of the listed buildings within close proximity to the site are Grade II listed with St Andrews Church building Grade II*. A small part of the site which adjoins Market Place is within the Town Centre Conservation Area. 1 North St and 20-25 Market Place are all Grade II listed however they also form a group as stated within the individual listings (see table 1). The historic connection of these buildings amplifies the experience of the significance of each building in this group. There are also non-designed heritage assets located within the vicinity of the application site (shown as important buildings on figure 4 of this document).
4. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is therefore relevant to these listed buildings and their setting. It requires the Council to have "special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses." Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 also places a duty on the decision maker to give special attention to the desirability of preserving and enhancing the character of a Conservation Area.

Step 2: Assessment of the contribution to significance

5. In relation to listed buildings it is noted that there is no statutory definition of setting. However, having regard to the definition of setting is outlined in the Framework, it is possible for a site to be in the setting of a listed building even if there are no clear visual links between the two. In relation to conservation areas, it is again important to recognise that a site can influence and make a positive contribution to its setting.
6. The numbers and proximity of heritage assets in urban areas mean that the protection and enhancement of setting is intimately linked to townscape and urban design considerations. These include the degree of conscious design or fortuitous beauty and the consequent visual harmony or congruity of development, and often relates to townscape attributes such as enclosure, definition of streets and spaces and spatial qualities as well as lighting, trees, and verges, or the treatments of boundaries or street surfaces.
7. The main contribution of the existing shopping centre is in terms of the setting of the Town Centre Conservation Area. When approaching the town centre along North Street from Evreux Way the shopping centre is of a similar scale at 2 to 3 storeys to the prevailing character of the conservation area. When looking along North Street, the site does not currently provide a strong edge to the streetscape.

Step 3: Assessment of effects of the proposed development on significance & Step 4: Explore ways to maximise enhancement and avoid or minimise harm

8. The Rugby Town Centre Conservation Area appraisal, does not consider the existing shopping centre to be of any great architectural distinction and therefore the removal of existing poor-quality buildings and the provision of high-quality replacement buildings and public realm would have a positive impact on the setting of the conservation area. It is acknowledged however that there would an adverse impact from the partial loss of the open skyline above the site where the building heights are proposed to be increased in relation to the existing structures with the highest part being to Northway and the contrast of scales in this location.
9. There is a notable and sudden drop in building heights from the 5-storeys (18.3m) high Napier Building to the 2-storey (10.7m) high to the shopping centre. The impact of this 7.6m drop is compounded by the blank and uninspiring appearance of the

building which is of almost no architectural merit. When coupled with its horizontal massing it is left wanting and undeniably detracts from and has an adverse impact on the Conservation Area.




10. The proposed parameters for development of this site seeks to rectify the current deficiencies of the existing buildings and provides an opportunity to comprehensively enhance the site and better connect it with the surrounding context. It is pertinently clear that in order to do this the height of any proposed development on the site would need to increase to redress the sudden drop in heights when looking north along North Street. Moreover, an increase in height provides a greater opportunity for a stronger design to be created which in turn would uplift the visual appearance and character of the area.
11. When looking along North Street from the town centre the proposed maximum building height parameter within this development brief would follow the ridge line of the adjoining Napier building. When looking south along North Street towards the town the buildings would appreciably provide a stronger sense or urban form that better tie in and connect with the rest of the town centre.
12. Regarding the Grade II* listed Church of St Andrew, it considers that the proposed scheme would result in a minor adverse impact on its setting as a result of the spire becoming less apparent in certain glimpsed views across the site from the northwest and west. This would correspond to a negligible adverse impact on its significance. It is considered that there would be no impact on the setting of the Grade II Lawn and a neutral impact on the Rugby Baptist Church, Sunday School, 1 North Street and 46 Chapel Street. In relation to 20-25 Market Place it is considers that the enhancement and retention of 21-22 Market Place would have a beneficial impact upon this group of listed buildings subject to the final design. The setting of the Clock Tower would also be enhanced subject to a satisfactory design being proposed. The identified levels of adverse impact are considered to be less than substantial harm which should be weighed against the public benefits of the scheme when planning permission is sought.
13. it is accepted that the proposed scheme would have some impact upon designated heritage assets within the vicinity of the site. In relation to the Rugby Town Conservation Area this impact would moderate beneficial to the setting and minor beneficial impact to its significance. However, in the case of the Grade II* listed Church of St Andrew, there would be a minor adverse impact on its setting as a result of the spire becoming less apparent in certain glimpsed views across the site from the northwest and west. This would correspond to a negligible adverse impact on its significant. It is judged that the proposal would result in 'less than substantial' harm to this asset

14. Being tall structures, church towers and spires are often widely visible across land- and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view.
15. The development brief sets out that the listed building within the red line of the site (21&22 Market Place) must be retained and enhanced and the illustrative masterplan and design principles reflect this. If the Rugby Central entrance which has been retrofitted to the building is removed this will provide a positive change as the building will become more prominent within the street scene and its setting.



Step 5: Decision and monitoring

16. It is not envisaged that there would be any substantial harm or loss of the significance any designated heritage assets based on the parameters and design principles set out within this brief. When planning applications are submitted in relation to this site a heritage impact assessment will be required to confirm this based on the detailed design proposals.

Table 1: Key listed buildings

Address	Picture	Listing Information
The Windmill Inn, 1 North Street <i>Grade II</i>		THE WINDMILL INN, Non Civil Parish - 1035029 Historic England Note: No1 North Street and Nos 20-25 Market Place form a group as stated within all the individual listings.
25 Market Place <i>Grade II</i>		25, MARKET PLACE, Non Civil Parish - 1365033 Historic England
23 and 24 Market Place <i>Grade II</i>		23 AND 24, MARKET PLACE, Non Civil Parish - 1184103 Historic England

21 and 22 Market Place <i>Grade II</i>		21 AND 22, MARKET PLACE, Non Civil Parish - 1035027 Historic England
20 and 20A Market Place <i>Grade II</i>		20 AND 20A, MARKET PLACE, Non Civil Parish - 1365032 Historic England
46 Chapel Street <i>Grade II</i>		46, Chapel Street, Non Civil Parish - 1035045 Historic England

<p>Clocktower <i>Grade II</i></p>		<p>https://historicengland.org.uk/listing/the-list/list-entry/1300276</p>
<p>Church of St Andrew <i>Grade II*</i></p>		<p>CHURCH OF SAINT ANDREW, Non Civil Parish - 1183695 Historic England</p>

Rugby Borough Council

Climate Change and Environmental Impact Assessment

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action.

Rugby Borough Council declared a climate emergency in 2019 and the Council's Corporate Strategy (2021-2024) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions are further defined through the Council's Climate Change Strategy [link](#) and must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes greenhouse gas emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

To help you complete this assessment, please see the following guidance on SharePoint [here](#).

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to your Chief Officer for approval.

If you require help, advice and support to complete the form, please contact your Chief Officer.

SECTION 1: OVERVIEW

Portfolio and Service Area	Growth and Investment
Policy/Service/Change being assessed	The report recommends to Cabinet that it approves the publication of the draft Rugby Central SPD for public consultation.
Is this a new or existing Policy/Service/Change?	New.
If existing policy/service please state date of last assessment	Not applicable.
Ward Specific Impacts	Benn, Eastlands and New Bilton
Summary of assessment Briefly summarise the policy/service/change and potential impacts	<p>The Rugby Central SPD aims to set out specific and concise design parameters to ensure high quality design on the largest catalytic site in the town centre to promote vitality and vibrancy.</p> <p>Whilst this assessment indicates ‘no change’ with regard to climate indicators, the document has been developed with the aim of uplifting the quality of development proposals in respect of these key climate matters, amongst others. The SPD sets out design parameters focused on the layout and site redevelopment. However, it does not detail the implementation, which will have significant influence on the actual climate and environmental impacts. Following the consultation and creation of the final SDP, more specific impacts may be identified in a review of the assessment.</p>
Completed By	Ella Casey (Principal Planning Officer – Town Centre Regeneration)
Authorised By	Nicola Smith (Chief Officer for Growth & Investment)
Date of Assessment	25th November 2025

Appendix 3

SECTION 2: GREENHOUSE GAS EMISSIONS

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Scope 1 Emissions Direct emissions from council owned resources, for example through boilers or vehicles.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			
Scope 2 Emissions Indirect emissions occurring at the location energy is produced for council activities. For example, electricity generation for council buildings.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			

SECTION 3: CLIMATE CHANGE STRATEGY

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Workplaces and the Economy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		None at this stage		
Transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		None at this stage		

Appendix 3

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Natural Environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			
Homes and Energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			
Waste, Resources and the Circular Economy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			
Climate and Nature Positive Communities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			

Appendix 3

Adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			
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Appendix 3

SECTION 4: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	Adoption of the updated SPD, likely September 2026
Key points to be considered through review	No negative impacts have been identified at this stage
Person responsible for review	Ella Casey (Principal Planning Officer – Town Centre Regeneration)
Authorised by	Nicola Smith (Chief Officer for Growth & Investment)

Appendix 3

Version date: November 2024

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	Growth & Investment – Major Projects and Regeneration
Policy/Service being assessed	Rugby Central SPD – consultation draft
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	This is a new document which supplements existing adopted policy within the Local Plan 2011-2031
EqlA Review Team – List of members	Ella Casey – Principal Planning Officer (Town Centre Regeneration)
Date of this assessment	25 th November 2025
Signature of responsible officer (to be signed after the EqlA has been completed)	Nicola Smith

A copy of the completed and signed Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Officer.

Details of Strategy/ Service/ Policy to be analysed

Stage 1 – Policy to be analysed	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	The Rugby Central SPD aims to set out specific and concise design parameters to ensure high quality design on the largest catalytic site in the town centre to promote vitality and vibrancy.
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	It primarily fits with 'A Thriving Rugby' and 'A Healthier Rugby'. The SPD aims to make us more effective and consistent in guiding planning applications on the largest potential regeneration site in the town centre, whilst also aspiring to higher quality places and associated social, environmental and economic benefits.
(3) What are the expected outcomes you are hoping to achieve?	The Town Centre is no longer fit for purpose and therefore to support local residents, businesses and communities a shift in how the town centre feels, looks and operates is needed to generate a want to visit, dwell, live and do business in Rugby town centre.
(4) Does or will the policy or decision affect: <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	The policy will initially principally impact applicants and developers through the planning process for developments on the site. Residents likely to be impacted by development on the site will have the change to submit their views through the public consultation the cabinet report is asking for approval for. In meeting its objectives, the SPD should positively impact the future occupiers.
(5) Will the policy or decision involve substantial changes in resources?	No.
Stage 2 – Evidence about user population and consultation	

<p>(1) What does the data tell you about the groups this policy or decision impacts?</p> <p>Possible data sources:</p> <ul style="list-style-type: none"> • national statistics/census data • local statistics • evaluations • analysis of complaints • user feedback • outcomes from consultation/community voice • Council published information, service data • District and Ward Profile – Warwickshire Observatory • Office of National Statistics • Fingertips health profiles • Indices of Multiple Deprivation • RBC Annual Workforce Equality Report 	<p>The vacancy rate for shops in rugby is 25% (including Rugby Central Shopping Centre). The footfall as of January 2025 shows a reduction of 10% of users from the previous year due to the decline of the town centre (more vacant units). This has improved in recent months due to events however a catalytic change is needed.</p> <p>Consultation on the regulation 18 local plan consultation version showed support for draft Policy C1 which sought the redevelopment of Rugby Central Shopping Centre.</p> <p>The consultation, if approved by cabinet would be reported back to cabinet and council.</p>
<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	<p>N/A</p>

(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.	Cabinet report seeks approval for 4 week consultation on the document which will be carried out in accordance with the statutory requirements for local plan documents – set out within the report.		
Stage 3 – Analysis of impact			
<p>(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	Protected Characteristic	Nature of Impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Age	Neutral	N/A
	Disability	Neutral Accessibility of the redevelopment has been considered however it is for detailed planning applications to fully consider and assess this.	N/A
	Sex	Neutral	N/A
	Gender reassignment	Neutral	N/A
	Marriage/civil partnership	Neutral	N/A
	Pregnancy/maternity	Neutral	N/A
	Race	Neutral	N/A
	Religion/belief	Neutral	N/A

	Sexual Orientation	Neutral	N/A
(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Positive – increased footfall in the town centre	Medium
	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution	Positive – change in uses to introduce housing and access to services.	Medium
(3) Using the information gathered in stages 2 and 3, what will the positive impact of the strategy/policy be on equality?	Regeneration by its general nature is to instigate positive change and reduce inequality gaps by providing opportunity, which is supported by Government's Levelling Up agenda. Therefore, there will be a positive impact should redevelopment on the site be realised and to a high quality as sought by the SPD.		
(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?	N/A		

<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>Yes, through public consultation. Data will be used to determine if any changes are required to the SPD before progressing to Council and adoption.</p>
<p>(6) Complete this section if any adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.</p>	

<p>Stage 4 – Action Planning, Review and Monitoring</p>	
<p>(1) Data analysis What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?</p> <p>The feedback/data should be used to inform your Action Plan in (2)</p>	<p>To be carried out during review.</p>

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1"> <thead> <tr> <th>Action</th> <th>Lead Officer</th> <th>Date for completion</th> <th>Resource requirements</th> <th>Comments</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Action	Lead Officer	Date for completion	Resource requirements	Comments															
Action	Lead Officer	Date for completion	Resource requirements	Comments																	
<p>(3) Review and Monitoring</p> <p>State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>	<p>The EqlA will be reviewed again after public consultation and before the SPD proceeds to adoption.</p>																				

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on 25th November 2025 and will be reviewed April 2025.’

AGENDA MANAGEMENT SHEET

Report Title: Town Centre Frontages Grant Scheme

Name of Committee: Cabinet

Date of Meeting: 6 January 2026

Report Director: Chief Officer - Growth and Investment

Portfolio: Growth and Investment, Digital and Communications

Ward Relevance: Benn / Eastlands / New Bilton

Prior Consultation: Town Centre Regeneration Working Group

Contact Officer: Matthew Fletcher - Economic Development Manager

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
☐ A Healthier Rugby – To support people to live healthier, longer, and more independent lives.
☒ A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.
☐ A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.
☐ A Fairer Rugby – To reduce inequalities and improve housing across the Borough.
[Corporate Strategy 2025-2035](#)
☐ This report does not specifically relate to any Council priorities but

Summary: This report outlines the proposals for a Town Centre Frontages Grant scheme to address key concerns in Rugby Town Centre around the condition of buildings and the impact this has on footfall, perception of the town and attracting new investment. This proposal creates a sustained, collaborative approach to supporting businesses and property owners to improve their properties. The decision is an executive decision, however owing to the sizeable capital contribution, the

Council's Constitution requires that it be approved at Council to enable it to be added to the Capital Programme.

Financial Implications:

This project has a total planned budget of £0.450m that will be met from the Town Centre Reserve over a period of 4 years from inception. Funding will be allocated in years 1, 2 and 3. The fourth year of the programme is to allow businesses time to complete capital works.

£0.300m relates to a capital scheme to be added to the capital programme over three years.

£0.150m relates to three years planned revenue budgets; 2026/27 amount of £0.050m is requested for approval in this report and future years will be incorporated as part of future years budget setting.

Further details can be seen in Section 8.

Risk Management/Health and Safety Implications:

There are no direct Risk Management / Health and Safety implications arising from this report.

Environmental Implications:

A climate change and environmental impact assessment is attached at Appendix 1.

Legal Implications:

Businesses will be required to sign an agreement letter for each grant they are awarded and commit to the Council's terms and conditions.

High level financial viability checks will be undertaken with businesses applying for the works grant to ensure any risk of the business ceasing trading in the immediate future are mitigated as much as possible.

For the works grant businesses will have to agree to occupy their premises for at least 2 years after completion of works, unless significant financial duress can be proven. The Council will have a right to clawback funding for the works grant if terms and conditions are not met.

The grant fund scheme conforms with subsidy control guidance specifically it is allowed under the streamlined routes guidelines, specifically the local growth section, which specifically covers capital support and wider support to property.

Equality and Diversity:

A full equality impact assessment has been completed, and is attached at Appendix 2

Options:

1. Cabinet does not approve the proposals.
2. Cabinet approves some of the proposals
3. Cabinet approves all of the proposals

Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT -

1. a 4-year project to fund improvements to frontages in Rugby Town Centre be approved;
2. the creation of a two-stage grant process comprising of an enabling fund (revenue) and a works package (capital) be approved;
3. delegated authority be given to the Chief Officer - Growth and Investment to make changes to the scheme during delivery;
4. a General Fund Supplementary revenue budget of £0.050m for 2026/27 for Shopfront Design Grants be approved. Future years will be incorporated into the annual budget setting process; and
5. a General Fund Supplementary capital budget of £0.300m, profiled as £0.100m per annum from 2026/27 to 2028/29 for the Shopfront Improvement Works Grants be approved and added to the capital programme.

Reasons for Recommendation:

1. A 4-year plan will allow enough time to make significant impact on poor quality frontages, that in conjunction with other schemes will contribute to the wider evolution and enhancement of the Town Centre.
2. A two-stage process will ensure that as many properties as possible will have approval for improvements and ensure that all relevant statutory approvals are in place. It will also mean that those properties in most need and that will create the most impact can be focused upon.

3. Due to the 4-year period of the programme, flexibility is required to adapt to any funding opportunities or learning points arising from the process. Delegated responsibility will allow the Chief Officer to make changes within the life of the project to ensure it meets both the needs of the Council and businesses.
4. Whilst the decision to approve this programme of funding is an executive decision, to be made by Cabinet, owing to the sizeable capital contribution £300,000, the RBC constitution requires that it to be ratified at Council.

Cabinet - 6 January 2026

Town Centre Frontages Grant Scheme

Public Report of the Chief Officer - Growth and Investment

Recommendation

IT BE RECOMMENDED TO COUNCIL THAT -

1. a 4-year project to fund improvements to frontages in Rugby Town Centre be approved;
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5. a General Fund Supplementary capital budget of £0.300m, profiled as £0.100m per annum from 2026/27 to 2028/29 for the Shopfront Improvement Works Grants be approved and added to the capital programme.

1. EXECUTIVE SUMMARY

- 1.1 A two-stage grant scheme has been proposed to improve frontages of vacant and poor-quality properties across Rugby Town Centre, the focuses on improving the environmental quality of key areas to decrease vacancy rates, increase footfall and create a better view and reputation of the area.
- 1.2 This forms part of the wider public realm and visual improvement schemes aimed to support the regeneration of the town centre, to increase footfall and to support town centre businesses.
- 1.3 The reports seeks Cabinet's approval, followed by that of Council to create an annual revenue budget of £50,000 to support design and compliance works, supported by a £300,000 capital fund to carry out works.

2. BACKGROUND

- 2.1 In certain areas of Rugby Town Centre, there are collections of properties that are suffering from higher than average levels of vacant units and where premises are in visibly poor condition or of a poor standard.
- 2.2 A recent, previous scheme, funded through the UK Shared Prosperity Fund (UKSPF) made an impact, however was limited in what it could achieve due to Government spend timescales. This programme proved popular, with the Economic Development team still receiving queries about this scheme now.
- 2.3 The Council is committed to improving the look and feel of the Town Centre. This programme sits alongside other associated Town Centre workstreams which comprise public realm improvements including updates to street furniture and planting along with larger scale public realm improvements around St Andrews Church and along North Street and Church Street. There is also asset intervention work, to take control where the market has failed, such as High Street Rental Auctions and more ambitious acquisition programmes of decaying town centre assets including Rugby Central Shopping Centre and the creation of a Cultural Quarter around Old Market Place adjacent to the Council's multi-storey car park.
- 2.4 This programme for shop front improvements is designed to directly assist existing businesses within the Town Centre over a 4 year period.

3. GRANT PROGRAMME

- 3.1 The grant programme proposed is a four-year scheme starting in April 2026 until the end of March 2030. Funding will only be available to be applied for up until the end of March 2029 but works will be allowed to continue until the end of March 2030.
- 3.2 The fund will focus on specific areas of the town that are visibly suffering from a lack of investment. The primary aim is to improve the look and feel of properties in specific areas, both those currently in occupation or vacant. Investment in these properties will aim to improve the kerb appeal of premises, making areas feel more attractive and inviting, but also to encourage investment into vacant and other surrounding units that need less intensive works.
- 3.3 The following high-level criteria is proposed for the first two years of the scheme, this will be reviewed based on demand, success and impact on the Town Centre. The scheme will be launched in quarter 4 of financial year 2025/2026 but will not start spend until at least quarter 1 of financial year 2026/2027.
- 3.4 Grants will only be given to premises that are located in Sheep Street and High Street for financial year 2026/2027 and be extended to other areas for future years:

- 3.5 Sheep Street and High Street have the highest number of premises that are either vacant or in poor condition, in a compact geographical area. Change to these areas would offer a significant opportunity to improve the street scene and encourage new users and increased footfall in these areas.
- 3.6 Whilst it is recognised that there are other premises in need across the wider town centre, these are often in isolation, surrounded on average by higher quality premises.
- 3.7 By focusing on a specific geographical location, in a key area of the town, that is suffering from lower footfall it is envisaged that grant intervention from the Council will make a significant impact on the wider environment and eco-system.
- 3.8 This approach also allows specific targeting of premises in these areas and allows resources to be deployed more efficiently and effectively. The Economic Development Team in delivering these grants, can therefore ensure all businesses are communicated with and told about the grant. This would be a lot harder to do across the whole Town Centre.
- 3.9 For the second and third year of the scheme further areas of the town will be focused upon. These will be decided upon, once success in year one has been assessed, but are likely to include North Street, Railway Terrace and Albert Street. The same approach of focusing on a specific geographic area, for that funding period, will be adopted.
- 3.10 Grants will only be given to business that are visibly in a poor condition and are having a negative impact on the area. This could include such things as poor quality signage, rotten woodwork and old glazing. Primarily, condition will be judged by photographic evidence and visits to site by relevant Council officers. It is not proposed to engage property surveyors in this process in order to manage costs.
- 3.11 This fund will be targeted at independent businesses who do not always have available cash flow or capital to make improvements. Therefore, large or national chains will not be eligible to apply.
- 3.12 Landlords and property owners will be able to apply for a grant to improve vacant premises to make them become more attractive to the market.
- 3.13 Any premises that received a grant through the previous shop front façade scheme or is actively being supported through the High Street Rental Auction will not be eligible for a grant.

4. GRANT PROCESS

- 4.1 Based on learning and experience from the previous scheme, it is proposed to break the grants process into a two-stage approach:
- 4.2 Stage 1: Enabling – a maximum of 10 businesses can apply to receive 100% grant funding up to a maximum value of £0.005m to get their shopfront designed and approved through the planning process.

- 4.3 Receiving this grant will not automatically guarantee the applicant grant funding for carrying out the works, they will have to apply for this. Any costs incurred over £0.005m, will need to be paid for by the grant recipient.
- 4.4 A funding round window for businesses to apply for the enabling fund will be ran every Jan – March. It is intended that business can only apply during these funding windows, but discretion will be given based on demand.
- 4.5 Stage 2: Works – only businesses that have successfully completed the enabling phase can then apply for a grant of up to £0.020m to carry out the works.
- 4.6 Businesses will need to provide and evidence a minimum 20% match funding of the works to ensure their commitment.

5. RATIONALE

- 5.1 Financial resources are limited, and the Council cannot support every premises with an identified need for funding. However, the approach proposed aims to ensure premises are ready for investment should opportunities for future funding arise. Up to 10 businesses per annum will have plans approved that will have a three-year life after approval to enable funding, either through any other public source that may arise or from their own sources.
- 5.2 The enabling stage allows officers to create a cohort of businesses every year, working intensively and collaboratively with those businesses to understand their needs, create relationships and make better informed decisions about future funding or other interventions that may be needed.
- 5.3 Challenges in grant schemes such as this are often that businesses do not provide the level of evidence and information asked, creating additional administration. This can be mitigated through closer working and one to one engagement. This sort of delivery is intense but pays dividends in terms of evidencing and evaluating the correct use of public funds.
- 5.4 The second stage of the process would be the works. As these costs will be higher than the enabling costs, subject to available funding, not every premises may receive works funding.
- 5.5 In the cases of both grant stages, Councillors will have discretion, upon the advice of officers and in conjunction with the Chief Officer to make appropriate amends to the scheme. The scheme will also be reviewed annually to ensure that the fund is sufficient to meet the demand.

6. ENABLING STAGE CRITERIA

- 6.1 The Whole grant eligibility will apply in the first instance
- 6.2 Businesses will receive up to £0.05m in direct funding, no match funding will be required.

- 6.3 Businesses will be paid upon provision of evidence of one quote from a suitably qualified third party for each relevant piece of work with the exception of planning fees.
- 6.4 Eligible businesses will be visited by officers to market the grant fund.
- 6.5 Officers will work with each annual cohort to intensively support businesses to ensure they understand the requirements of the fund and create strong, long lasting relationships.
- 6.6 There will be a three month window from fund opening to close of the process ran every January to March. This time period will allow officers to promote the fund and engage proactively with landlords and businesses, supporting them where needed through the application.
- 6.7 At the end of the funding window, applications will be assessed with recommendations made to a panel for approval.
- 6.8 Applications will be assessed based on a set criteria, including such factors as current shop front condition, impact on the area.
- 6.9 Officers will make recommendations for grant funding that will be approved by the Portfolio Holder for Growth & Investment and Digital & Communications.

7. WORKS STAGE CRITERIA

- 7.1 Only businesses that received an enabling grant can apply for the works grant.
- 7.2 Businesses can only apply once their planning permission is approved.
- 7.3 Businesses can apply for up to a maximum £0.020m of funding.
- 7.4 Business will have to provide a minimum match funding of 20% of the total project costs.
- 7.5 Evidence of ability to fund 20% of works will be sought during the application process.
- 7.6 Subject to values of works provide, businesses will have to provide evidence in line with Council procurement thresholds.
- 7.7 Applications will be assessed based on a set strict criteria, including such factors as current shop front condition, impact on the area. Not all businesses that apply will be approved.
- 7.8 Officers will make recommendations for grant funding that will be approved by the Town Centre Regeneration Working Group.

8. RESOURCE IMPLICATIONS

- 8.1 The Economic Development Team (EDT) will manage this process.

- 8.2 It is proposed that a named planning officer with relevant experience is assigned to deal with all applications arising from this project to ensure consistency and effective decision making with EDT officers.
- 8.3 Options for funding this scheme are currently being explored in detail as the scheme comprises both revenue and capital grant funding. Potential funding being explored is the Town Centre Strategy Reserve or existing budgets, however no final decision has been made.
- 8.4 The current position with regards external funding similar to that of UKSPF, Levelling Up Fund or Local Growth fund is unknown at the point of writing this report. There may be options for future external funding opportunities to support this scheme and these will be reviewed as assessed if and when they arise.

9. FINANCIAL IMPLICATIONS

- 9.1 The revenue and capital budget requirements are set out in the table below:

Project year	Financial year	Enabling Works (revenue budget) £000	Improvement Works (capital budget) £000
Year 1	2026 / 2027	50	100
Year 2	2027 / 2028	50	100
Year 3	2028 / 2029	50	100

- 9.2 The recommendation for a capital scheme of £0.300m across 3 years will be funded from the Town Centre Reserve. This has been agreed by Town Centre Project and Programme Boards and Town Centre Regeneration Working Group.
- 9.3 The recommendation for a revenue budget of £0.050m for 2026/27 will be funded from the Town Centre Reserve. This has been agreed by Town Centre Project and Programme Boards.
- 9.4 Future years revenue budgets from 2027/28 will be incorporated into budget setting process at the relevant time as required, also to be funded from the Town Centre Reserve.
- 9.5 Whilst there are currently no identified sources of external funding for this scheme, if an appropriate opportunity arises during the duration of this programme all attempts will be made to use external funding instead of the Town Centre Reserve. This may require some changes to the scheme dependent upon the funding requirements

10 OPTIONS FOR CONSIDERATION

- 10.1 There are the following options regarding the approach to delivering the Town Centre Frontages Grant Scheme.
- Cabinet does not approve the proposals.
 - Cabinet approves some of the proposals
 - Cabinet approves all of the proposals

- 10.2 If Cabinet does not approve the proposals, there will not be a grant programme to improve poor quality frontages in the Town Centre.
- 10.3 If Cabinet approves some of the proposals detailed in this document, there will be limited impact as only a selection of property owners may be able to receive grant funding.
- 10.4 There is a risk that investment by property owners is delayed or not forthcoming as they are not willing to invest their own monies in seeking relevant compliant, approvals and statutory permissions.
- 10.5 If Cabinet adopts all of the proposals, the outcome will be as follows:
- Grants will be available for property owners in the town centre to design and seek permission for frontage improvements up to a maximum value of £0.005m per annum.
 - Grants will be available for property owners in the town centre to apply for physical improvements up to the value of £0.020m per annum with 20% match funding from them.
 - This scheme will contribute to the wider eco system of support being put into place by the Council and others to encourage the evolution of the Town Centre.

11 CONCLUSION

11.1 The proposed grant scheme, will have a significant impact on the Town Centre environment and eco system over the next 4 years, which will be amplified by the wider range of support the Council and its partners are investing into additional regeneration projects and support programmes.

11.2 The scheme has been designed to ensure that as many properties as possible can achieve compliant, designed frontage schemes, up to a maximum of 30 over the next 4 years.

11.3 By focusing on specific streets in annual cohorts, changes in the street scene and investment should be highly visible and impactful over the grant scheme delivery timeframe.

Name of Meeting: Cabinet

Date of Meeting: 6 January 2026

Subject Matter: Town Centre Frontages Grant Scheme

Originating Department: Growth and Investment

DO ANY BACKGROUND PAPERS APPLY ☐ YES ☒ NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Rugby Borough Council

Climate Change and Environmental Impact Assessment

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action.

Rugby Borough Council declared a climate emergency in 2019 and the Council's Corporate Strategy (2025-2035) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions are further defined through the Council's Climate Change Strategy [link](#) and must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes greenhouse gas emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

To help you complete this assessment, please see the following guidance on SharePoint [here](#).

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to your Chief Officer for approval.

If you require help, advice and support to complete the form, please contact your Chief Officer.

SECTION 1: OVERVIEW

Portfolio and Service Area	Growth and Investment
Policy/Service/Change being assessed	Town Centre Grant Frontages Scheme
Is this a new or existing Policy/Service/Change?	This is a new grant scheme for the Town Centre.
If existing policy/service please state date of last assessment	N/A
Ward Specific Impacts	Relevant to Benn Ward and Eastlands Ward
Summary of assessment Briefly summarise the policy/service/change and potential impacts	The service provides grants to property owners in Rugby Town Centre to improve poor quality frontages, improving the street scene with the potential for improving environmental sustainability, such as in new lighting and more efficiently insulated door and windows.
Completed By	Matthew Fletcher – Economic Development Manage
Authorised By	Nicola Smith – Chief Officer for Growth and Investment
Date of Assessment	13 th November 2025

SECTION 2: GREENHOUSE GAS EMISSIONS

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Scope 1 Emissions Direct emissions from council owned resources, for example through boilers or vehicles.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Scope 2 Emissions Indirect emissions occurring at the location energy is produced for council activities. For example, electricity generation for council buildings.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 3: CLIMATE CHANGE STRATEGY

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Workplaces and the Economy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Properties in the Town centre will be able to invest in new frontages that are likely to be more efficient in terms of energy saving.	None	EDT	Up to end of March 2023
Transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Natural Environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Homes and Energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Waste, Resources and the Circular Economy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Climate and Nature Positive Communities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Adaptation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 4: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	Annual review every March during lifetime of scheme. April 2026 – end March 2030.
Key points to be considered through review	No negative impact currently identified
Person responsible for review	Matt Fletcher – Economic Development Manager
Authorised by	Nicola Smith – Chief Officer Growth and Investment.

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	Growth and Investment
Policy/Service being assessed	Town Centre Frontages Grant Scheme
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	This is a new grant scheme for the Town Centre.
EqlA Review Team – List of members	Nicola Smith – Chief Officer, Growth and Investment
Date of this assessment	13th November 2025
Signature of responsible officer (to be signed after the EqlA has been completed)	

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Chief Officer for Legal and Governance.

Details of Service to be analysed

<u>Stage 1 – Service to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	The service provides grants to property owners in Rugby Town Centre to improve poor quality frontages, improving the street scene with the potential for improving environmental sustainability, such as in new lighting and more efficiently insulated door and windows.
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	The Economic Strategy demonstrates alignment with the new Corporate Strategy 2025 – 2035 in particular the strand of a Thriving Rugby.
(3) What are the expected outcomes you are hoping to achieve?	<p>A two-stage grant scheme that will improve frontages in properties across the Town Centre.</p> <p>Specific outcomes are:</p> <ul style="list-style-type: none"> • Up to 10 grants a year for three years of £5000 to enable property owners to design and seek permissions for improvements. • Grants of up to £20,000 to deliver improvements. <p>General outcomes are:</p> <ul style="list-style-type: none"> • An improved Town centre street scene and environment. • Increased footfall. • Increased investment in the Town centre. • New business start ups. • Reduced vacancy levels. • Better perception of the Town centre.

<p>(4) Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>Successful delivery of the grant scheme should have a positive affect on businesses in the town centre.</p>
<p>(5) Will the policy or decision involve substantial changes in resources?</p>	<p>Yes – the grant fund will require an investment over 4 years of £450,000.</p>
<p><u>Stage 2 – Evidence about user population and consultation</u></p>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>
<p>(1) What does the data tell you about the groups this policy or decision impacts?</p> <p>Possible data sources:</p> <ul style="list-style-type: none"> • national statistics/census data • local statistics • evaluations • analysis of complaints • user feedback • outcomes from consultation/community voice • Council published information, service data • District and Ward Profile – Warwickshire Observatory • Office of National Statistics • Fingertips health profiles • Indices of Multiple Deprivation • RBC Annual Workforce Equality Report 	<p>The data tells us that there are a high number of vacancies across Rugby Town Centre, with approximately 25% of units being vacant against a national average of 14%. This high number takes into consideration a large number of vacancies in Rugby Central.</p> <p>Assessment of the Town Centre from an asset perspective shows collections of properties in certain areas that are of poor environmental quality and may also be vacant and suffering from under investment. Data shows areas of low-quality properties specifically around certain roads, including Sheep Street, High Street, North Street and Railway terrace. Whilst there are pockets of issues in other roads, these areas show the greatest numbers.</p> <p>Consultation activity across a broad number of themes and activities, from events, to street markets, to regeneration plans, to the local plan to car parking strategy, have strongly evidenced that both businesses and residents are concerned about the quality of the Town Centre, both in how it looks and feels, and the offer available.</p> <p>The Economic Development Team whilst relatively new has already had two formal complaints from residents as well as numerous informal complaints from a broad range of the community on this matter. Social media posts about the Town Centre on a variety of fora also generate consistent comments about the quality of properties and the number of vacancies.</p>

<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	<p>A previous frontage scheme was delivered using UKSPF funding that was popular, with demand not being able to be met due to project timelines. This demand has been used as a basis on which to develop a second programme with learning from the original scheme.</p> <p>Whilst speaking to businesses in the Town Centre, businesses have consistently and regularly mentioned and requested grant support to improve the quality of frontages in the area. Businesses have also raised concerns about vacant buildings in the Town Centre and their quality, and how this reflects on footfall and people visiting their properties. Discussions have also taken place with a small number of landlords / property owners, with a focus on vacant shops. There has not been direct consultation about specifics of the proposed scheme but has been deemed relevant and appropriate consultation and feedback.</p> <p>In summary businesses in the Town Centre is the primary group that have been spoken to with further engagement will a small number of direct property owners.</p>		
<p>(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>Not applicable.</p>		
<p><u>Stage 3 – Analysis of impact</u></p>			
<p>(1) Protected Characteristics</p> <p>From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	<p>Protected Characteristic</p>	<p>Nature of Impact Positive, Neutral, Adverse (explain why)</p>	<p>Extent of impact Low, medium, high</p>
	<p>Age</p>	<p>Neutral, no impact identified.</p>	<p>N/A</p>
	<p>Disability</p>	<p>Neutral, no impact identified.</p>	<p>N/A</p>
	<p>Sex</p>	<p>Neutral, no impact identified.</p>	<p>N/A</p>

	Gender reassignment	Neutral, no impact identified.	N/A
	Marriage/civil partnership	Neutral, no impact identified.	N/A
	Pregnancy/maternity	Neutral, no impact identified.	N/A
	Race	Neutral, no impact identified.	N/A
	Religion/belief	Neutral, no impact identified.	N/A
	Sexual Orientation	Neutral, no impact identified.	N/A
(2) Cross cutting themes (a)Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Geographically disadvantaged communities – the grant scheme covers the Town Centre, which features some of the most disadvantaged communities in Rugby Borough.	Positive. Changes in The Town Centre, may encourage the creation of new businesses and new jobs as a result that could offer opportunities for the surrounding communities.	Low.

<p>(3) Using the information gathered in stages 2 and 3, what will the positive impact of the strategy/policy be on equality?</p>	<p>Whilst it is noted that the grant has specific eligibility requirements, the Economic Development Team has designed the scheme so that it is inclusive and accessible for as many applicants as possible. The particular focus is one ensuring the grants are targeted so support from Officers can be tailored to specific needs, meaning that the likelihood of someone not applying for a grant due to equality issues or other barriers they face is as minimal as possible. This approach also seeks to maximise the opportunity for a broad a range of people as possible to benefit from the grants.</p> <p>The positive impact of the scheme will be that the Town Centre should feel a more attractive, accessible environment, with less vacancies and higher quality properties, creating new opportunities for job creation and upskilling of local people.</p>
<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>	<p>Potentially language and literacy. We will ensure that any related communications and publicity are provided, where required in a manner which is understood by speakers of other languages. There will be a project officer assigned to the programme, from the Economic Development Team who will work hand in hand with applicants, on a one to one basis, to ensure all requirements of the fund are understood and can be completed.</p> <p>Awareness. The programme will focus on clusters of businesses / properties in certain areas, one year at a time. This focus will allow the Economic Development Team to create a cohort of landlords and businesses and ensure every business in that area is made aware of the fund and knows how to apply.</p>
<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>Examples of the types of data we will look to collect are:</p> <ul style="list-style-type: none"> • New jobs created (by age, gender, ethnicity) • Jobs safeguarded (by age, gender, ethnicity) • Business supported (by sector and ward) • New business start ups (by age, gender, ethnicity, business type)

<p>(6) Complete this section if any adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.</p>	<p>No adverse impacts or discrimination were identified as a result of delivering this grant programme.</p>
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<p><u>Stage 4 – Action Planning, Review and Monitoring</u></p>	<p>Not applicable at this point – to review</p>
<p>(1) Data analysis What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?</p> <p>The feedback/data should be used to inform your Action Plan in (2)</p>	

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1"> <thead> <tr> <th>Action</th> <th>Lead Officer</th> <th>Date for completion</th> <th>Resource requirements</th> <th>Comments</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(3) Review and Monitoring</p> <p>State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>	<p>This will be reviewed on an annual basis between January and March and amended as appropriate.</p>																													

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).’

AGENDA MANAGEMENT SHEET

Report Title: GEC Recreation Ground Changing Room Development

Name of Committee: Cabinet

Date of Meeting: 6 January 2026

Report Director: Chief Officer - Leisure and Wellbeing

Portfolio: Partnerships and Wellbeing

Ward Relevance: Hillmorton

Prior Consultation: Fareham Youth Partnership, Junior Parkrun, local residents

Contact Officer: Tom Kittendorf- Chief Officer Leisure & Wellbeing

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
☒ A Healthier Rugby – To support people to live healthier, longer, and more independent lives.
☐ A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.
☐ A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.
☐ A Fairer Rugby – To reduce inequalities and improve housing across the Borough.
[Corporate Strategy 2025-2035](#)
☐ This report does not specifically relate to any Council priorities but

Summary: The report seeks to bring forward a preliminary capital budget as outlined in the 2025/26 General Fund budget for the facility investment at the GEC Recreation Ground to be funded from reserves

Financial Implications: A total of £250,000 to be added to the Council's Capital Programme for the development of facilities at the GEC Recreation Ground changing rooms.

Increased in utilities for the operation of a community space, primarily through the provision of heating and lighting to the new community space.

Introduction of new fees and charges to account for the income generation to the Council for the external hire of the community space.

Use of the Council's reserves as outlined in the 2025/26 General Fund budget setting approved at Cabinet on 2 February 2025.

Risk Management/Health and Safety Implications:

Risk management implications include the potential non delivery of capital projects should recommendations and budget requests not be approved.

Environmental Implications:

Opportunities to develop the Council asset and reduce the cost of utilities using new technology to reduce the overheads of the changing room block.

Legal Implications:

The Council are responsible for ensuring appropriate use of its financial resources. Consideration for the usage of the facility to be considered, although asset likely to remain fully owned and managed by the Council's Parks and Open Spaces team.

Equality and Diversity:

An Equalities Impact Assessment has been completed. The community facility development project aims to provide a new community space within the Council's parks and open spaces for community groups to utilise and offer vital services to local residents.

Options:

1) Approve the proposed development as detailed in the report, to be funded by Council reserves as outlined in the 2025/26 General Fund budget.

2) Reject the capital project proposal.

Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT delegated authority be given to the Chief Officer for Leisure and Wellbeing for the establishment of a capital budget of £250,000 for the development of the GEC Recreation Ground facility to be funded through reserves and/or Section 106 funding following final confirmation of building cost specifications.

**Reasons for
Recommendation:**

The capital budget requests will enable ensure efficient and effective financial processes for the Council to deliver investment and development in to key council assets and deliver the aims of the Corporate Strategy.

Cabinet - 6 January 2026

GEC Recreation Ground Changing Room Development

Public Report of the Chief Officer - Leisure and Wellbeing

Recommendation

IT BE RECOMMENDED TO COUNCIL THAT delegated authority be given to the Chief Officer for Leisure and Wellbeing for the establishment of a capital budget of £250,000 for the development of the GEC Recreation Ground facility to be funded through reserves and/or Section 106 funding following final confirmation of building cost specifications.

1. Executive Summary

- 1.1 The historic GEC Recreation Ground was bought by British Thompson-Houston in 1919 for their sports club, becoming GEC's ground following a merger in 1967. Rugby Borough Council assumed control through a lease agreement in 2006 and continues to provide sport and leisure facilities on the site.
- 1.2 In 2007, the Council sealed a deal to buy the freehold of the 5.4hectare site adding to its 300 hectares of open space and recreation land. Primarily managed through the Parks and Open Spaces service, these open spaces are subject to ancillary facilities such as changing rooms and public toilets and require a programme of capital improvements as and when required.
- 1.3 Following the purchase of the site and long term security of tenure, this report seeks create a capital budget for the investment into the pavilion facility developing a highly used community asset.
- 1.4 The 2025/26 General Fund Capital Budget Report outlined a series of potential uses for Council reserves for Capital items. This included £0.250m for the investment into developing facilities in communities such as the use of or expansion of changing rooms at the GEC Recreation Ground.
- 1.5 The proposed capital project supports the Council deliver its Corporate Strategy objectives including:
 - Support and grow pride in everything great about Rugby borough
 - Provide access to leisure, cultural and outreach services to reduce isolation.
 - Ensure that residents have access to quality parks and open spaces.

- 1.6 In 2023/24 Council officers undertook engagement with community groups who regularly use the GEC changing room to ascertain their views on the potential development of the building. These partners included representatives of The Fareham Youth Trust, AEI Rugby RFC and Junior Parkrun.
- 1.7 The initial engagement highlighted an aspiration of the community groups for the changing room block to be developed to deliver a wider community impact, most notably in the form of a hireable community space that groups could utilise having undertaken physical activity at the Recreation Ground.
- 1.8 Subsequently, an architecture company was approached to provide a series of options for the introduction of a community space in addition to the existing footprint of the facility. These designs were displayed at a community funday delivered by The Fareham Youth Trust to gather community feedback and opinion on the proposed project.
- 1.9 The proposed design based on the feedback is provided within the report.
- 1.10 Upon approval of the capital budget, the Parks and Open Spaces and Property Teams will oversee delivery the capital project as part of its Open Spaces programme and oversee the next stage to building cost specifications, planning permission application and procurement of an external contractor.

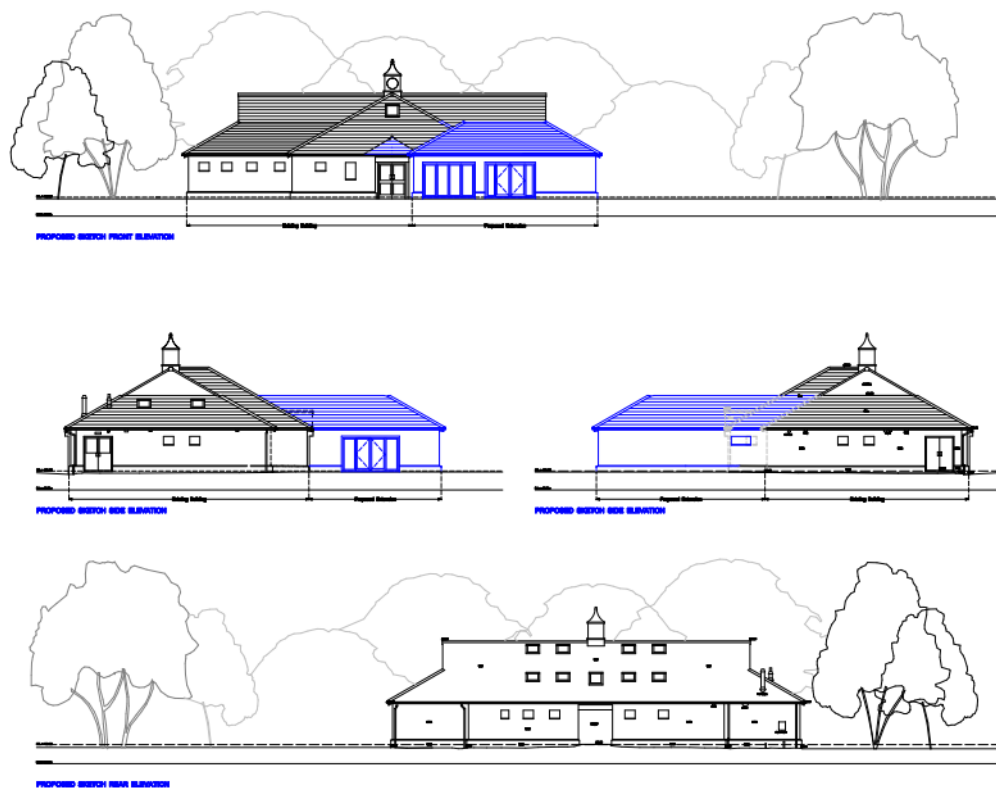
2. Overview of Site

- 2.1 In 2007, Rugby Borough Council entered a 50-year lease for the site and in line with the Council's corporate strategy to achieve a Better, Fairer, Greener borough, the site was officially purchased in September 2024.
- 2.2 The GEC Recreation Ground is approximately 5.56hectares that includes open grassland, sports fields, outdoor gym, children's play area and changing room pavilion.
- 2.3 The changing room pavilion is a single storey building of brick construction with a pitched roof and consists of 6 communal changing rooms, 2 referee rooms, 3 WC's, disabled WC, first aid room, external storage and a plant room.
- 2.4 The site has 78 car parking spaces including disabled bays and is fully tarmacked with lighting and landscaping.
- 2.5 The Recreation Ground and pavilion currently serves a multitude of sports and community provision including rugby union, football and junior parkrun.
- 2.6 The facility does not currently have any form of social space to enable users to hire social meeting room/community facility and is therefore limited in its wider community provision.

3. The GEC Recreation Ground - Extension Proposed Design

- 3.1 Now that the GEC Recreation Ground is formally owned by Rugby Borough Council, it is appropriate to consider its future use and development opportunities.
- 3.2 A full valuation report was conducted on the existing pavilion in September 2024 (Appendix 1).
- 3.3 The Council sets out annually its draft Council Tax Base, General Fund and Capital Budget as part of its financial responsibilities and a Medium-Term Financial Plan. The 2025/26 budget was approved at Cabinet in February and Full Council in February 2025.
- 3.4 Within the draft Capital Budget potential uses of Council reserves were identified. Projects included £0.250m investment into developing community facilities such as the use of or expansion of changing rooms at the GEC Recreation Ground.
- 3.5 The proposed use of Council reserves is subject to Full Council approval to bring forward schemes and create a budget.
- 3.6 Following the outline proposal of reserves, an initial scoping phase was undertaken for the potential development of the changing room facility. An architecture company was approached to provide a series of options for the introduction of a community space in addition to the existing footprint of the facility.
- 3.7 The following design has been provided by Vagdia & Holmes – Chartered Architects and Construction Advisors based on a proposed budget to address the need for community space.
- 3.8 The design provides additional community facilities of:
 - Multi-Functional Community Facility
 - Community Café Area
 - Kitchen and Servery
 - Store
- 3.9 In addition to the physical space increase, access to the existing toilet provision within the footprint of the changing rooms will be provided.
- 3.10 The proposed extension does not alter any of the existing internal changing room provision that is currently available to community sports clubs.

3.11 Figure 1 - Elevations



3.12 Figure 2 - Footprint



4. Existing Building Condition

- 4.1 A valuation report was undertaken in September 2024 by chartered surveyors Reynolds Butler.
- 4.2 Whilst the valuation report set out no undue health and safety risks were noted during the inspection of the property, it was noted that the external fabric of the building is currently in condition, focused on external guttering and roof condition leading to water ingress.
- 4.3 The capital project would seek to address any existing condition issues and ensure the facility continues to be a long term future asset for the delivery of community sport and activity.

5. Next Steps

- 5.1 The proposed project requires formal addition to the Council's capital programme to enable officers to undertake further development work and progress to the next stage of seeking building specification costs, planning permission and potential procurement of contractor.
- 5.2 A detailed cost specification plan will be sought to ensure aspects of construction, inflation, professional fees, surveys, statutory fees and contingency can be delivered within the financial scope of the project. The expenditure would be attributed to the capital programme and directly accounted for against the project.
- 5.3 A scoping brief including planning drawings, statements, survey coordination, submission and LPA liaison will be further considered.

6. Conclusion

- 6.1 This report seeks to establish a new capital budget using Council reserves as set out in the 2025/26 Draft Capital Items report approved by Full Council in February 2025.
- 6.2 The capital project supports the Council's corporate strategy objectives for residents to have access to high quality recreation facilities, whilst also delivering new community provision at one of the Council's key open spaces.

Name of Meeting: Cabinet

Date of Meeting: 6 January 2026

Subject Matter: GEC Recreation Ground Changing Room Development

Originating Department: Leisure and Wellbeing

DO ANY BACKGROUND PAPERS APPLY ☐ YES ☐ NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

VALUATION

**GEC RECREATION GROUND
HILLMORTON ROAD
RUGBY
WARWICKSHIRE
CV22 5ED**

**CLIENT:
RUGBY BOROUGH COUNCIL**

CONTENTS

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APPENDIX 1 – LOCATION PLAN AND FREEHOLD LAND REGISTRY PLAN**APPENDIX 2 – SCHEDULE OF COMPARABLE EVIDENCE**

1.0 INSTRUCTIONS, COMPLIANCE AND BASIS OF VALUATION

1.1 Instructions

Instructions were received to prepare a valuation report on the aforementioned property from the Client on 5th September 2024. My instruction was confirmed with a purchase order on 13th September 2024. Terms of business and terms of engagement were issued on 18th September 2024.

1.2 Identification and status of valuer

The valuation will be carried out myself, Philip Reynolds, MRICS, of Reynolds Butler. I qualified as a Chartered Surveyor in 2006, and have experience of valuing, managing and advising on property throughout England and Wales, and have practiced from a base in the West Midlands area since 2010. I started training and working as a surveyor in 2002. I confirm that I have relevant experience to undertake this valuation, and that I am an RICS Registered Valuer. I further confirm that I am able to carry out an objective and unbiased valuation. I have had no past material involvement with the subject property. I carry out other property consultancy work for the Council, which you are aware of.

1.3 Identification of the client and any other intended users

The valuation will be produced to assess the market value of the above property. It is to be used for the 'Purpose of the valuation' stated below only and should not be relied upon for any other purpose or by any third party. It is confidential to you as the client, and your professional advisors, in connection with the purpose of the valuation.

1.4 Purpose of the valuation

The purpose of the valuation is to support the justification for the recent purchase of the freehold interest by the Council.

1.5 Identification of property to be valued

The property to be valued is the freehold interest in the above property, which is registered under Land Registry title no. WK397653. The freehold interest was purchased by Rugby Borough Council on 10th September 2024. The Council was previously also the long leaseholder, however, it is understood the interests have now merged.

I have obtained copies of the above freehold title register and title plan, although it is noted to be out of date as it does not record the Council as the owner due to the very recent purchase. I have not obtained a copy of the former leasehold title, for which it is assumed an application will be made to strike this out. I have not been provided with a copy of the transfer document for the purchase by the Council.

1.6 Basis of value

The property will be valued on the basis of Market Value, as set out in RICS Valuation – Global Standards (effective 31st January 2022), and as set out in International Valuation Standards 104 paragraph 30.1. This is defined as follows:

the estimated amount for which an asset or liability should exchange on the valuation date between a willing buyer and a willing seller in an arm's length transaction, after proper marketing and where the parties had each acted knowledgeably, prudently and without compulsion.

1.7 Valuation date

10th September 2024

1.8 Nature and Extent of the valuer's work – including investigations – and limitations thereon

- I carried out an inspection of the property on 9th September 2024.
- I will not carry out a building survey. I have measured the pavilion at the property for the purpose of my valuation calculations.
- I will not carry out formal searches of Local Authority Registers or on Title (other than obtaining a copy of the Land Registry title documents referred to above, for the title documents, extracts which were dated and timed 18th September 2024 15:10:58 for both the title document and plan). I have obtained these documents for general information only, and have not carried out a detailed analysis of them. It has therefore been assumed that no onerous or restrictive covenants attach to Title.
- I will not carry out a test to services, nor have I inspected those parts of the property that are covered, unexposed or inaccessible and such parts have been assumed to be in good repair and condition, unless informed otherwise.
- I have not undertaken any site investigation, geological, mining or geophysical survey and therefore cannot clarify whether the ground has sufficient load-bearing strength to support any of the existing buildings or any other constructions that may be erected in the future. The report will give no warranties as to the condition of the structure, foundations and soil.

1.9 Nature and source of information to be relied upon

- My letter of 18th September 2024, setting out my fee and Terms of Business.
- Email correspondence from the Council, setting out details of the property and income related to the property.
- Auction particulars produced by Cottons Chartered Surveyors in regard to the property, in anticipation of the property going to auction on 11th September 2024 (it was withdrawn prior to the auction).

1.10 Assumptions

The following assumptions will be relied upon for the purposes of the valuation:

1. The property is free from any unusual borrowings or unusual encumbrances.
2. The roads from which the property is accessed, Hillmorton Road and Lower Hillmorton Road, are both adopted.
3. The property is available with vacant possession.
4. Any information given to me, either verbally or in writing from yourself, your representatives or from any official sources (including your solicitor or the Local Authority), is capable of formal substantiation.
5. I shall assume that there are no outstanding statutory notices other than any which are identified to me.
6. I shall assume that there are no contraventions of any statutory requirements. No allowance will be made in respect of rights, obligations or liabilities arising from the Defective Premises Act 1972, Building, Fire or Workplace (Health, Safety and Welfare) Regulations 1992, the Fire Precautions Act 1971, the Regulatory Reform (Fire Safety) Order 2005, Disability Discriminations Act 1995, the Equality and Diversity Act 2010, and the Health and Safety at Work Act 1974.

7. I shall assume that the use and occupation are both lawful. It will be assumed that there is no breach of planning regulations relating to land and properties forming part of this valuation. No consultation will take place with the relevant Planning Authority.
8. The report will not purport to be a building survey. No structural surveys or specialist inspections and / or testing of electrical heating or building service apparatus will be undertaken. At the time of inspection, those parts of the property which were covered, unexposed or inaccessible, will be assumed that such parts are in good repair and condition. The report will not purport to express an opinion about or to advise upon the condition of uninspected parts and should not be taken as making any implied representation or statement about such parts.
9. I have not arranged for any investigations to be carried out to determine whether or not any deleterious or hazardous material, including asbestos and reinforced autoclaved aerated concrete (RAAC), is present at the property, and am therefore unable to report that the property is free from risk in this respect.
10. Unless stated to the contrary, no investigations have been carried out to determine whether the site has a history of instability and I am, therefore, unable to report that the property is free from risk in this respect. I will assume, for the purpose of the valuation, that such investigation would not disclose the presence of any such problems.
11. I have assumed that no radon gas is present at the property.
12. No investigations have been undertaken to establish the presence of any asbestos or asbestos containing materials within the property. I will assume, for the purpose of the valuation, that such investigation would not disclose the presence of such material to any significant level and that any asbestos containing materials found could safely remain in situ and be monitored rather than a requirement for their removal.
13. I will not identify the existence of contamination unless either reports have been made available to me in this respect or, during the course of my inspection, I conclude that there may be material contamination at the property. In the latter case, I will report this possible contamination immediately with a view to a decision being taken as to whether the valuation instructions are to be amended. Otherwise, my valuation has been undertaken on the assumption that no contaminative or potentially contaminative uses have ever been carried out on the property. Should it be established subsequently that contamination does exist at the property or on any neighbouring land, or that the premises have been or are being put to any contaminative use, this might reduce the values reported.
14. Enquiries have not been made of the local authority and unless otherwise stated, I have assumed that there are no planning proposals, highway improvements or compulsory acquisition schemes likely to affect value. I have also assumed planning consent and all other statutory requirements have been obtained and complied with for occupation of the property. Formal searches have not been made and I reserve the right to amend my valuation should information at variance to these assumptions be forthcoming.
15. The valuation will include the value attributable to those items of plant and equipment in the property that are used to provide normal building services to the property. No technical surveys of the condition of plant and machinery will be undertaken.

1.11 Restrictions on use, distribution or publication

- I accept responsibility to the client alone that the report has been prepared with the skill, care and diligence which may reasonably be expected of a competent valuer but accept no responsibility whatsoever to a person, other than those detailed in the above section *Identification of the client and any other intended users* who relies upon the report at their own risk.

- Neither the whole nor any part of the Valuation Report may be included in any published document, circular or statement nor published in any way without my written approval of the form and context in which it may appear.

1.12 Valuation standards

I confirm that this valuation will be undertaken in accordance with the standards contained in *RICS Valuation – Global Standards* (*'The Red Book'*) incorporating *the International Valuation Standards (IVS)*.

2.0 PROPERTY DESCRIPTION

2.1 General Description and features

The extent of the property is as shown edged red (but not also edged green) on the attached Freehold Land Registry plan in Appendix 1. It extends to approximately 5.56 ha (13.74 acres). The property is used as a public park and playing fields, with car parking, pavilion, an outdoor gym area and children's play area. It is located to the north of Hillmorton Road and to the south of Lower Hillmorton Road, approximately 1 mile south-east of the town centre of Rugby.

The external areas of the property comprise open grassland, sports fields (with two pitches currently laid out as full size football pitches, one as a smaller football pitch, and one as a rugby pitch), an outdoor gym area with gym equipment, children's play area with play equipment within it, and with earth bunding around these areas, with surfaced pathways through and around the land. There is gym furniture on the eastern boundary of the site also. The land is planted with trees around the boundaries and in some positions within the land to provide screening. There are car parking areas both off Hillmorton Road and Lower Hillmorton Road. The car park with access off Hillmorton Road, to the southern side of the property, has 78 spaces, including disabled spaces, it is fully tarmacked, with lighting and landscaping areas and the spaces are marked out, with a metal height restriction barrier set back set back along the access road between the public highway and the car park. There is a pavement for pedestrian access alongside the vehicular access to the car park, and an additional pedestrian access from Hillmorton Road in the south-western corner of the property, alongside the north-western side of the car park. The car park on the north-western corner of the property is a gravel surfaced car park, with space for approximately 18 vehicles, also with a height restriction barrier on the boundary with the public highway. The car park is not lit, nor with spaced marked out. There are three pedestrian accesses to the north of the land, from Hillmorton Road, and one gated vehicular access, at the centre of this northern boundary.

The building on the site is located adjacent to the car park, and is a single story pavilion, with a patio area, pathways and planting forming a screening around it. It is of brick construction, with a pitched, tile roof and metal roller doors over the pedestrian doors at the two entrances, one being to the side fronting the car park and one being to side fronting the playing fields. There are Velux windows to the roof. The other window apertures are completely sealed. The building briefly comprises an entrance hallway and office, 3 WCs and a disabled WC, 2 x referees' room, 6 x communal changing rooms with showers and toilets, first aid room, attendant's room, as well as a plant room and external store room (these two rooms were not inspected). There is a mixture of flooring throughout the pavilion. The building is thought to have been constructed in the mid-2000s. The internal and external condition of the building is generally poor overall. This is principally due to evidence of water ingress in various places throughout the property. There is evidence externally of the roof felt having disintegrated and the guttering is misaligned in places. There is evidence of roof repairs having been undertaken previously. However, it is clear that significant remedial work needs to be undertaken to the roof and to the guttering.

It is understood that the pitches and pavilion are hired out on an ad-hoc basis, and the income received by the Council in the last financial year was £2,222.

2.2 Condition

The external parts of the property area are in poor condition overall for the property's age and type, and the internal parts of the property are also considered to be in poor condition overall, for the reasons discussed above. The internal fittings to the pavilion appear to be generally of reasonable quality.

2.3 Situation and surrounding area

The property is located to the north of Hillmorton Road (with the pavilion and formal car park on this side of the property) and to the south of Lower Hillmorton Road, approximately 1 mile south-east of the town centre of Rugby. The area surrounding the property on all sides is primarily residential in nature, as is the eastern side of Rugby (from the town centre) in generally, whilst also including some schools, other playing fields, a former rail line used for public access, as well as some local retail and leisure facilities.

In terms of transportation, the property is served as follows:

Rail: The property is located approximately 1.3 miles from Rugby rail station, with direct services to London Euston (50 minutes - fastest), Birmingham (30 minutes - fastest) and Manchester (between 1hr 20 mins), with cross-country services to destinations around the UK, changing at Coventry.

Road: The property is located approximately 1 miles from Rugby town centre, 15 miles from Coventry, 35 miles from Birmingham, 22.5 miles from Leicester, 21 miles from Northampton and 86 miles from London, with good access straight onto the M6, M45, M1 and A14 a few miles from the property.

Bus: There is a bus stop on Hillmorton Road, close to the southern entrance to the property, from where there are regular bus services to the centre of Rugby, and some other suburban areas of the town.

2.4 Size of property and accommodation

Measurements of the building were taken during the inspection, and the gross internal area of the building is calculated to be 324.56 sqm or 3492.27 sq ft.

The area of the site as a whole was calculated using mapping software to be 5.56 ha (13.74 acres).

2.5 Plans

The location of the property is shown circled red on the attached location plan in Appendix 1. The extent of the property is shown edged red on the Agreed Form of Lease Plan, also in Appendix 1.

3.0 LEGAL MATTERS

The following comments are made based on the investigations undertaken in the course of this valuation. You should ask your solicitor to verify the comments below.

3.1 Report on Title

No report on title was obtained at the time of this valuation.

3.2 Possession

The freehold of the property is owned by Rugby Borough Council, as further detailed in 1.5 above.

3.3 Tenancies

There are not understood to be any tenancies to which the property is subject.

3.4 Access to property – legal rights

As noted in 1.10.2 above, it is assumed that the roads onto which the property has access are adopted as public highway. The pedestrian accesses are detailed in 2.1 above. There are no public rights of way through the land shown on the Ordnance Survey map, although the whole site is open for public access.

3.5 Easements, wayleaves and rights of way

My investigations have not found the presence of any of the above, however, if any do exist, my valuation is made on the assumption set out in 1.8 above, assuming that no onerous or restrictive covenants attach to Title.

3.6 Services

As noted in 1.8 above, I have not carried out any work to establish the presence of services, however, it is assumed that the property is connected to mains electricity, water and sewage.

3.7 Restrictive agreements and covenants

As noted in the assumption made in 1.8 above, I have assumed that no onerous or restrictive covenants attach to Title.

3.8 Energy Performance Certificate (EPC)

No EPC has been located for the property.

3.9 Rateable value

No rateable value assessment was located for the property.

3.10 VAT status

It is assumed that the property is not elected for VAT, however, it is advised you make your own investigations in this regard.

3.11 Outgoings

Other than utilities and any business rates which may become applicable at any time, (ie. running costs of the property), it is assumed that there are no other unusual outgoings relating to the property.

3.12 Town and Country Planning

I have not undertaken planning investigations in the production of this report, and it is assumed that all planning regulations have and will continue to be complied with. It is also assumed that the property has planning consent for its existing use and any further planning consents will be obtained as required for the future proposed uses. I have confirmed in the current Rugby Borough Council Local Plan 2011-31 that the whole of the property is allocated as public open space.

3.13 Flooding

I have consulted the Government's long term flood risk map. The property is not designated as an area of flood risk from rivers or reservoirs. The property, and the two roads which it has access onto (along the sections adjoining the property) are not designated as areas at risk of flooding from surface water.

3.14 Highways

This is discussed in 3.4 above.

3.15 Health and safety issues

No undue health and safety risks were noted during the inspection of the property.

4.0 EVALUATION

4.1 Market Trends

The RICS UK Economy and Property Market Update (August 2024) summarises as follows:

The August interest rate cut by the Bank of England may or may not be followed by further reductions over the coming months but the direction of travel has now shifted and this will help support economic activity through the back end of this year and into 2025. The RICS Construction Monitor continues to highlight financial constraints as the key impediment to activity demonstrating the significance of this signal for the building industry. Alongside this, forward looking indicators point to a likely modest uplift in activity in the residential sector while polarisation between asset performance will remain a major feature in the commercial real estate market.

The RICS Q2 2024 UK Commercial Property Monitor summarises as follows:

- *Headline tenant demand and investment enquiries metrics remain flat*
- *London office market continues to see stronger activity relative to the rest of the UK*
- *Overall market still widely seen to be either at the bottom of the cycle or in the early stages of an upturn*

Radius Data Exchange shows that for planning use D1 (as defined by Radius Data Exchange, which is the use class which is closest to the current use or which it could conceivably gain permission for), the average rent for the West Midlands region (chosen due to a greater level of data across the region for this use class) is shown at £11.32 per sq ft, with an occupational sale price of £82 per sq ft. The respective figures for the neighbouring East Midlands region are £9.21 per sq ft and £147 per sq ft.

The average net yield for D1 planning uses over the last 12 months in the West Midlands region was 8.7%, and for the East Midlands was 8.3%.

4.2 Comparable evidence

I have obtained the comparable set out in Appendix 2. Due the unusual nature of the the property, there is no directly comparable evidence for playing fields with pavilions. I have therefore reviewed sales of amenity land and grazing land, which will be discussed further below, and adjusted accordingly.

4.3 Valuation commentary

I have considered the value of the property from two main standpoints, firstly, by considering the income which could be received from the property as a whole and applying an all risk yield, and secondly, by considering the value of the land and then separately of the building, on both an occupational and investment basis.

Turning firstly to the income approach for the property as a whole, I have considered the income of £2222 per annum which the Council is currently receiving. I have also considered the charging rates which the Council and other neighbouring Councils publish for pitch hire. With the changing room facilities, it appears reasonable that a charge out rate of between £1000 and £1500 per pitch per season is possible for adult rugby or football use, say £1,250 per annum. Assuming at least 2 teams use each adult and the junior pitch (applying half this rate for the junior pitch) results in a potential income of £8,750 per annum. In addition to this, there may also be the opportunity to derive some additional income from sports training uses, organised events and the like, therefore a purchaser may reasonably assume an income of £10,000 per annum. Considering the yield levels above, and accounting for the fact that any buyer would need to manage the existing public access, inherit a building in need of significant repair, maintain the various facilities and administer the hire, whilst having the opportunity to raise additional revenue for example, through car park charging, allowing food and drink concessions in the car park, altering part of the pavilion to serve drinks and snacks (or possibly let as a concession) would suggest an overall yield of 10% may be reasonable, therefore resulting in a value of £100,000.

Approaching the valuation from an occupational standpoint, for the pavillion, taking the gross internal area of 3492.27 sq ft and applying a 10% reduction to reach a potential net internal area level for a D1 use results in a level of 3143 sq ft. Applying a level, based on the existing use and condition, and a need to obtaining planning permission to alter to a D1 use, of 25% of a potential D1 occupational sale level of £100 per sq ft, ie. £25 per sq ft, would result in a level of £78,575. Using the comparable evidence for the land, I have assumed an amenity value of between £15,000 and £20,000 per acre in its existing use and assuming no prospects for development, but without the public open space designation and history of public use. Taking a significant reduction of up to 75% of this value, say £5,000 per acre, to account for the planning designation and established public use, and applying this to an area of 4.73 ha or 11.69 acres (when accounting for the pavillion and its curtielidge) results in value of £58,450. This produces an overall value of £137,025.

Considering the above, and taking a mid-point between the two values results in a level of, say, £120,000, which equates to an overall level of £8,734 per acre, which would appear reasonable. I would add that if this property were put to market, the valuation range would be significant, due to the unusual nature of the property, and the potential uses to which a purchaser may consider it could be put to, and the certainty level regarding the valuation is low in comparison to more established asset types where much greater comparable evidence can be gathered and where there is an active market.

5.0 VALUATION

5.1 Market value

Having carefully considered the matter, based on the assumptions set out above, I am of the opinion that the Market Value of the freehold interest in **GEC recreation ground, Hillmorton Road, Rugby, Warwickshire, CV22 5ED**, as at 10th September 2024, can be fairly reflected in a figure of **£120,000 (one hundred and twenty thousand pounds)**.

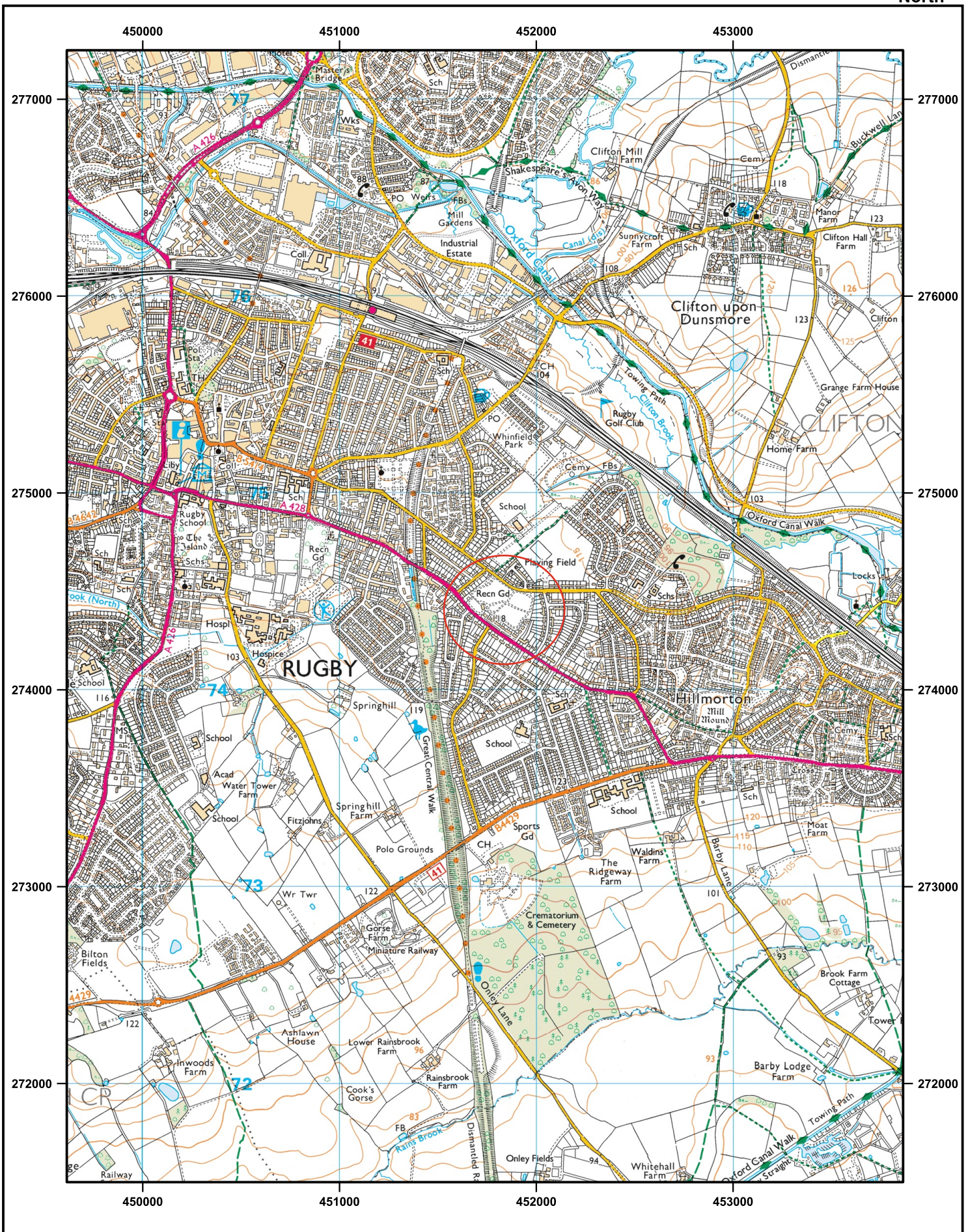
5.2 Signature and date



Philip Reynolds MRICS
RICS Registered Valuer
18th September 2024

APPENDIX 1

LOCATION PLAN AND FREEHOLD LAND REGISTRY PLAN



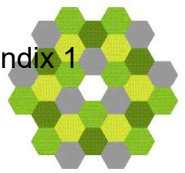
© Crown copyright and database rights 2024 OS AC0000848283. Public rights of way shown on this map have been taken from Local Authority definitive maps. The representation on this map of any other road, track or path is no evidence of the existence of a right of way.

HM Land Registry

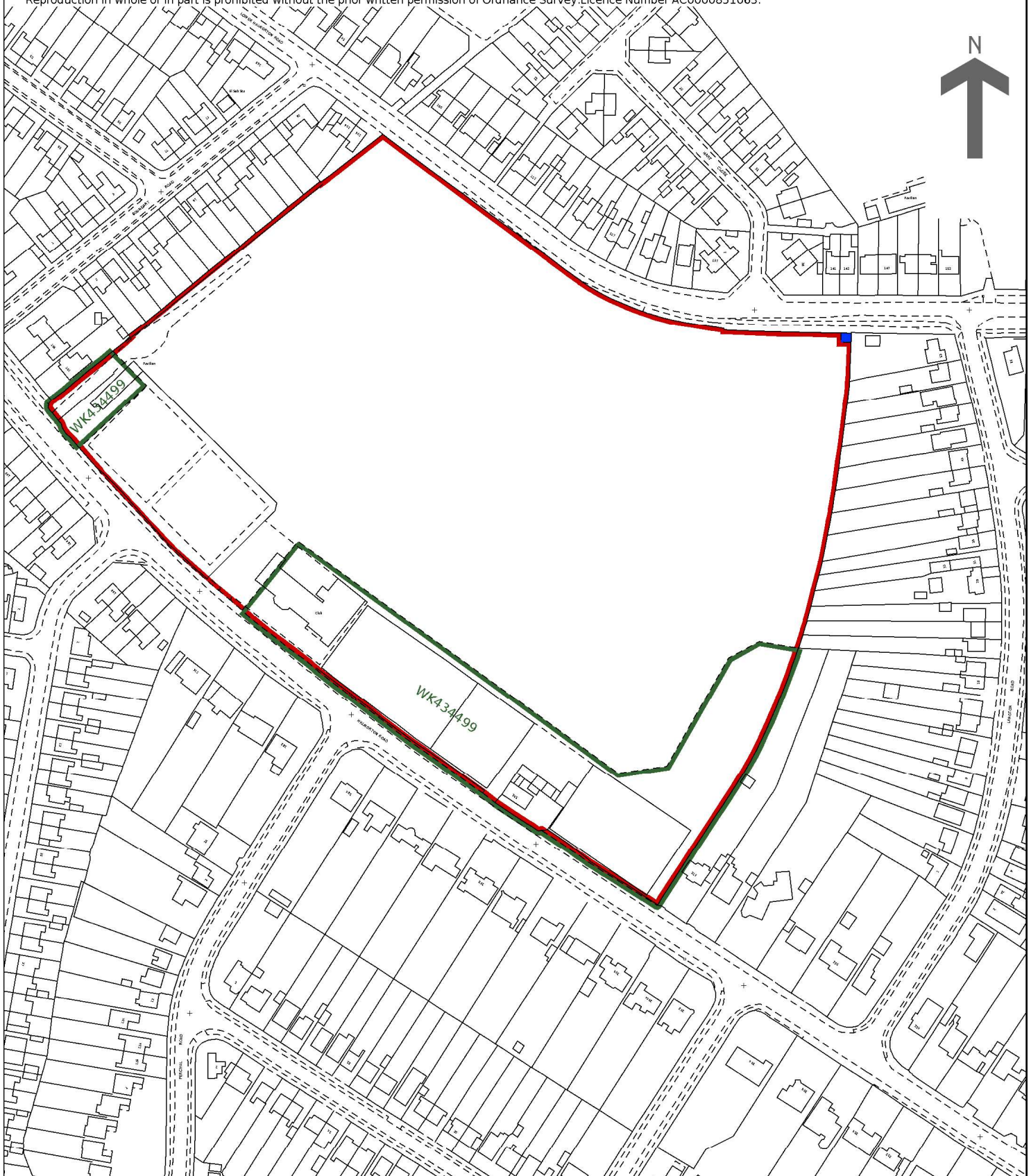
Official copy of title plan

Title number **WK397653**
Ordnance Survey map reference **SP5174SE**
Scale **1:2500 reduced from 1:1250**
Administrative area **Warwickshire : Rugby**

Appendix 1



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APPENDIX 2

SCHEDULE OF COMPARABLE EVIDENCE

COMPARABLE EVIDENCE - FREEHOLD AMENITY AND GRAZING LAND SALES

Comparable No.	Property Name	Location	Property type	Transaction date	Transaction type	Size (ha)	Size (acres)	Sale price	Sale price per ha	Sale price per acre	Overage provision?	Comments
1	Land at Rouncil Lane	Kenilworth	Pasture land	18/07/2023	Auction	0.80	1.97	£85,000	£106,617	£43,147	Not known	Single parcel of land with road frontage on two sides, with a few residential properties around, surrounded by hedgerows, approx. 3 miles by road from the centre of Kenilworth.
2	Land on the east side of Berkswell Rd	Meriden	Paddock land with wooden framed stables	20/06/2023	Auction	0.47	1.16	£116,000	£247,100	£100,000	Not stated	Land adjoining residential properties with road frontage between Meriden and Four Oaks.
3	Land on the east side of Berkswell Rd	Meriden	Paddock land	20/06/2023	Auction	0.69	1.7	£98,000	£142,446	£57,647	Not stated	Land adjoining residential properties with short area road frontage (subject to rights to adjoining land) between Meriden and Four Oaks.
4	Land at Firs Farm	Knowle	Paddock land	24/05/2023	Auction	1.14	2.82	£86,000	£75,357	£30,496	Not known	Two adjoining rectangular paddocks of roughly equal size. Fenced, with mains water and electricity, and a stable. Access via a private lane.
5	Land at the Ridgeway, Willoughby Rd, Kilsby	Rugby	Grazing land	20/12/2022	Auction	11.49	28.4	£400,000	£34,803	£14,085	Not known	Rural location between the villages of Kilsby and Barby, part adjoining the village of Barby. Access and road frontage to the Ridgeway.
6	Land on Henley Rd, Lower Norton	Warwick	Pasture land	18/07/2023	Auction	1.46	3.61	£116,000	£79,401	£32,133	Not known	Pasture land with road frontage to Henley Road, adjoining the M40. Surrounded by hedgerows, but not noted as fenced. Wide access with gates off Henley Rd.
7	Land at Boswell Drive	Coventry	Open space	23/05/2023	Auction	0.05	0.12	£9,000	£180,000	£75,000	Not stated	Land located in residential area, planted with trees, with access path along edge. Not designated in the Coventry Local Plan as public open space.
8	Land abutting Frithwood Crescent, Kents Hill	Milton Keynes	Land	12/09/2024	Auction	4856	1.2	£1,000	£0.21	£833	Not stated	Strip of land and roadways in and around a modern residential housing development. Some of the land is effectively informal public open space.
9	Plot 1, part of land in Brockwell Bowes Close	Newport Pagnel	Land	01/08/2024	Auction	2769	0.69	£5,000	£1.81	£7,246	Not stated	Land between houses and garages, being grassland alongside a pedestrian pathway. Land is allocated in the local plan as amenity open space.
10	Land on the north side of Tiddington Road	Stratford-upon-Avon	Arable land	22/05/2024	Auction	1.49	3.69	£141,000	£94,631	£38,211	Not known. Not stated on particulars.	Flat arable land in a single rectangular field with road frontage to Tiddington Road and with 3 access points in total. Surrounded by hedgerows on three sides and an access road / tree planting on the other.
11	Land at Feckenham Rd, Hunt End	Redditch	Pasture land	20/06/2023	Auction	3.52	8.7	£125,000	£35,511	£14,368	No	Pasture land located just south-west of Redditch, with road frontage to eastern side.

Rugby Borough Council

Climate Change and Environmental Impact Assessment

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action.

Rugby Borough Council declared a climate emergency in 2019 and the Council's Corporate Strategy (2025-2035) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions are further defined through the Council's Climate Change Strategy [link](#) and must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes greenhouse gas emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

To help you complete this assessment, please see the following guidance on SharePoint [here](#).

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to your Chief Officer for approval.

If you require help, advice and support to complete the form, please contact your Chief Officer.

SECTION 1: OVERVIEW

Portfolio and Service Area	Leisure and Wellbeing
Policy/Service/Change being assessed	Parks and Open Spaces Facility/Asset Development – GEC Recreation Ground Pavillion
Is this a new or existing Policy/Service/Change?	N/A
If existing policy/service please state date of last assessment	N/A
Ward Specific Impacts	Hillmorton (and surrounding area)
Summary of assessment Briefly summarise the policy/service/change and potential impacts	A proposed extension of the GEC changing room pavilion to introduce a hireable community space for the local community and community groups to utilise.
Completed By	Tom Kittendorf
Authorised By	Tom Kittendorf
Date of Assessment	1/12/25

SECTION 2: GREENHOUSE GAS EMISSIONS

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Scope 1 Emissions Direct emissions from council owned resources, for example through boilers or vehicles.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Possible impact with regards development of GEC pavilion infrastructure. Potential to improve energy efficiency and performance of existing pavilion.	None		
Scope 2 Emissions Indirect emissions occurring at the location energy is produced for council activities. For example, electricity generation for council buildings.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The current GEC pavilion is primarily changing room and toilet provision for sports facility users of the site. The proposed extension and development should consider impact of increased electricity and managing efficiency through use of modern technology.	To ensure any specification of works considered a suitable approach for reducing or minimising impact.	Tom Kittendorf	

SECTION 3: CLIMATE CHANGE STRATEGY

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Workplaces and the Economy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Natural Environment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Potential relocation of ornamental hedging that currently circles the building.</p> <p>Replacement or moving of ornamental hedging will be considered at design stage</p>	Consideration given to current bedding and ensuring within cost specification of any build project.	TBC	
Homes and Energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Waste, Resources and the Circular Economy	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	A community facility has potential to increase amount of waste, particularly food waste and recycling from drinks containers.	Clear restrictions of use of a community space should consider the requirement for any hirers to remove their own waste.		
Climate and Nature Positive Communities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Adaptation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The current GEC pavilion has had a survey undertaken with potential to include adaptations to heating, lighting and electrical sources.	To be considered at design and planning stage		

SECTION 4: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	TBC – As part of project development
Key points to be considered through review	Ensuring the council are delivering improved efficiencies within its leisure asset stock.
Person responsible for review	Tom Kittendorf
Authorised by	Tom Kittendorf

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:

Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	Leisure and Wellbeing
Policy/Service being assessed	GEC Recreation Ground Changing Room Pavillion
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	N/A
EqlA Review Team – List of members	Tom Kittendorf John Howes
Date of this assessment	1/12/25
Signature of responsible officer (to be signed after the EqlA has been completed)	T.Kittendorf

A copy of the completed and signed Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Officer.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	<p>The GEC Recreation Ground pavilion is a Council owned asset situated in the GEC Recreation Ground, part of the Parks and Open Spaces department.</p> <p>The pavilion provides changing rooms, toilets, referee changing and a small kiosk for serving refreshments.</p> <p>The main objective is to consider and build an extension to the existing footprint of the building to incorporate a hireable community space.</p> <p>The Council have worked with key community stakeholders to assess level of need and ensure the primary users views are reflected within the proposal.</p>
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	<p>The project will provide residents an improved facility within a well used park and sporting facility. This will support the Councils objective of residents being proud of their borough and support healthy lifestyles through provision of community spaces.</p>
(3) What are the expected outcomes you are hoping to achieve?	<p>The expected outcome is ensuring continued facility and service development to ensure the facility is offering a range of activities and offers for residents of the borough to engage with.</p> <p>It is anticipated that key stakeholders will be able to deliver events and activities within their own communities.</p> <p>It is anticipated that key stakeholders will be able to develop their own community offer and enable development of sport and physical activity within the borough.</p>

Appendix 3

<p>(4) Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>Wider community groups will have the opportunity to use the community space for delivering community based events and functions.</p>
<p>(5) Will the policy or decision involve substantial changes in resources?</p>	<p>No</p>
<p><u>Stage 2 – Evidence about user population and consultation</u></p>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>
<p>(1) What does the data tell you about the groups this policy or decision impacts?</p> <p>Possible data sources:</p> <ul style="list-style-type: none"> • national statistics/census data • local statistics • evaluations • analysis of complaints • user feedback • outcomes from consultation/community voice • Council published information, service data • District and Ward Profile – Warwickshire Observatory • Office of National Statistics • Fingertips health profiles • Indices of Multiple Deprivation • RBC Annual Workforce Equality Report 	

Appendix 3

<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	<p>In the last 2 years, Council officers have periodically engaged with community groups including Fareham Youth Partnership, Junior Park Run and a local rugby club user.</p> <p>The proposed development priorities providing a community space for these groups to develop their community offering.</p>		
<p>(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>NA</p>		
<p><u>Stage 3 – Analysis of impact</u></p>			
<p>(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	<p>Protected Characteristic</p>	<p>Nature of Impact Positive, Neutral, Adverse (explain why)</p>	<p>Extent of impact Low, medium, high</p>
	<p>Age</p>	<p>Positive</p>	<p>Low</p>
	<p>Disability</p>	<p>Positive</p>	<p>Low</p>
	<p>Sex</p>	<p>Positive</p>	<p>Low</p>
	<p>Gender reassignment</p>	<p>Positive</p>	<p>Low</p>
	<p>Marriage/civil partnership</p>	<p>Positive</p>	<p>Low</p>
	<p>Pregnancy/maternity</p>	<p>Positive</p>	<p>Low</p>

Appendix 3

	Race	Positive	Low
	Religion/belief	Positive	Low
	Sexual Orientation	Positive	Low
(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Positive	Low
	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution	Positive	Low

Appendix 3

<p>(3) Using the information gathered in stages 2 and 3, please describe how the policy/strategy/service will:</p> <ul style="list-style-type: none"> a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic 	<p>The proposed community space will be available for hire through the Council's fees and charges framework and provides opportunities for all residents to utilise.</p>
<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>	<p>None</p>
<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>Facility usage can be tracked to show impact of build and community room provision.</p>

<p>(6) Complete this section if any adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.</p>	NA
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<p><u>Stage 4 – Action Planning, Review and Monitoring</u></p>	
<p>(1) Data analysis What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?</p> <p>The feedback/data should be used to inform your Action Plan in (2)</p>	

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1"> <thead> <tr> <th>Action</th> <th>Lead Officer</th> <th>Date for completion</th> <th>Resource requirements</th> <th>Comments</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(3) Review and Monitoring</p> <p>State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>																														

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).’

AGENDA MANAGEMENT SHEET

Report Title:	Assets and Property Repairs Service - Transformation journey and resulting budgetary impact
Name of Committee:	Cabinet
Date of Meeting:	6 January 2026
Report Director:	Chief Officer - Communities and Homes
Portfolio:	Communities and Homes, Regulation and Safety
Ward Relevance:	All
Prior Consultation:	Report Consultation Officers Group, Portfolio Holder Communities and Homes, Liberal Democrat Group Spokesperson for Communities and Homes and a cross-party group of Members present at the rent setting for 2026/27 workshop which took place in November 2025
Contact Officer:	Peter Nicholas - Asset Maintenance Team Manager & Rob Foster - Repairs & Voids Manager
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	No
Forward Plan:	Yes
Corporate Priorities:	<p>This report relates to the following priority(ies):</p> <p><input checked="" type="checkbox"/> A Healthier Rugby – To support people to live healthier, longer, and more independent lives.</p> <p><input type="checkbox"/> A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.</p> <p><input type="checkbox"/> A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.</p> <p><input checked="" type="checkbox"/> A Fairer Rugby – To reduce inequalities and improve housing across the Borough.</p> <p>Corporate Strategy 2025-2035</p> <p><input type="checkbox"/> This report does not specifically relate to any Council priorities but</p>
Summary:	This report sets out the substantial progress made in understanding the condition and quality of the

Councill's portfolio of homes. It also sets out the resulting investment made in addressing issues identified through the stock condition survey work to ensure the safety and quality of homes, to meet the health and wellbeing needs of tenants.

The report reflects on the first 12 months of the Property Repairs Service transferring from Operations & Traded Services to Communities & Homes. It sets out the transformation journey and the achievements to date (appendix 3) and the positive outcomes for tenants (appendix 4).

The report also sets out the financial impacts which have arisen due to tackling issues identified through the comprehensive stock condition survey works, and in ensuring the Council's homes are safe, and of an appropriate quality, whilst also adhering to regulatory standards.

This has resulted in a recommendation for an additional supplementary revenue budget of £0.850M for 2025/26 to avoid the potential for an overspend in what is essentially a unique year.

Financial Implications:

The financial implications are set out in section 4.

Risk Management/Health and Safety Implications:

The Council has accelerated its programme of stock condition surveys and now has a known condition in respect of 86% of its homes.

However, the stock condition surveys identified a backlog of unreported repairs and hazards, that had to be addressed.

Environmental Implications:

An environmental impact assessment forms appendix 1 of this report

Legal Implications:

The Social Housing Regulation Act 2023 sets out the regulatory regime for social housing. In addition, the Safety and Quality Consumer Standard sets out required outcomes and specific expectations with which providers of social housing must comply.

Equality and Diversity:

An equality impact assessment forms appendix 2 to this report.

Options:

To note the improvements made to the condition of the Council's housing stock and agree the supplementary budget request, because of the budget pressure that has arisen in addressing

issues identified through the stock condition survey works.

If additional budget is not agreed this will result in an overspend for 2025/26.

Recommendation:

1) Cabinet notes the progress made in:

- understanding the condition of the Council's homes
- tackling the resulting repairs and hazards identified,
- the transformation journey of the Property Repairs Service and the Assets Service; and

2) IT BE RECOMMENDED TO COUNCIL THAT a supplementary budget of £0.850M from Housing Revenue Account Revenue reserves be utilised to support the additional repairs spend required for 2025/26.

Reasons for Recommendation:

To ensure that Members are aware of the positive progress and outcomes achieved to date

The Property Repairs Service has seen a significant financial pressure arise during 2025/26 budget to address legacy issues within the housing stock.

These were identified by the accelerated programme of stock condition surveys and ensuring compliance with regulatory standards in respect of the quality and safety of the homes.

From October 2025, Awaab's Law went live, imposing stringent targets on social housing landlords to urgently address reported cases of condensation and mould within their stock. This is welcomed as a means of ensuring the safety and quality of homes. The increased budget provision will also resource potential additional demand arising from these new requirements.

Cabinet - 6 January 2026

Assets and Property Repairs Service - Transformation journey and resulting budgetary impact

Public Report of the Chief Officer - Communities and Homes

Recommendation

- 1) Cabinet notes the progress made in:
 - understanding the condition of the Council's homes
 - tackling the resulting repairs and hazards identified,
 - the transformation journey of the Property Repairs Service and the Assets Service; and
- 2) IT BE RECOMMENDED TO COUNCIL THAT a supplementary budget of £0.850M from Housing Revenue Account Revenue reserves be utilised to support the additional repairs spend required for 2025/26

1. Executive Summary

- 1.1 There has been a substantial transformation journey undertaken during 2025 to ensure that the Council's homes are of a decent quality and are safe, whilst ensuring that tenants benefit from a more responsive and efficient Property Repairs Service.
- 1.2 The transformation journey was undertaken in response to the findings of a mock inspection of the service, undertaken in late 2024, with the aims of improving services for tenants and increasing assurance of the Council's compliance with the quality and safety standard set out on the regulatory framework for social housing.
- 1.3 In January 2025 the Property Repairs Service migrated from the Operations and Traded Service portfolio to the Communities, Homes and Regulatory Services portfolio, with a transformation project starting in March 2025.
- 1.4 The outcomes of the transformation project are covered in appendices 3 and 4 to this report, with the latter focusing on the positive benefits for tenants.
- 1.5 As a result of accelerating an already planned stock condition survey, the Council now understands the condition of 86% of its homes, with plans in place to continue to assess the condition of the stock through a rolling programme of 20% of the housing stock each year.

- 1.6 Through conducting the stock condition surveys, the Council identified 771 hazards as prescribed by the Housing and Health Safety Rating System. A further 160 were identified through tenancy health checks. As of November 2025, of the 931 hazards identified, 901 had been remedied, with the remaining 30 a work in progress.
- 1.7 As at 1 April 2025 there was a backlog of 1234 repair jobs, reducing to 526 at the end of October 2025.
- 1.8 From October 2025, Awaab's Law went live, imposing stringent targets on social housing landlords to urgently address reported cases of condensation and mould within their stock. This is welcomed as a means of ensuring the safety and quality of homes. The increased budget provision will also resource potential additional demand arising from these new requirements.
- 1.9 Investing in improving the condition of our homes and the quality of the repairs service has come at a cost. Therefore, this report requests an additional budget of £0.850M for 2025/26 to be funded from Housing Revenue Account Reserves, to avoid the potential for an overspend in this financial year.
- 1.10 The additional budget requirement has been challenging to forecast as the run rate of repairs has been so heavily influenced by the findings arising from the stock condition survey. As a result, it is anticipated that the 2025/26 year will be a financial outlier for the reasons set out in this report.

2. Background

- 2.1 The Social Housing (Regulation) Act 2023 introduced significant changes to the regulatory requirements for providers of social housing, with new consumer housing standards being introduced in April 2024.
- 2.2 The work of the property repairs and asset maintenance teams focuses on the Safety and Quality Consumer Standard, which sets out outcomes and specific expectations around:
 - Stock Quality
 - Decency
 - Health & Safety
 - Repairs Maintenance and Planned Improvement
- 2.3 Following the mock inspection, undertaken in late 2024, officers developed and have been implementing a safety and quality action plan, working towards achieving compliance with the safety and quality standard.
- 2.4 In August 2025 the service was inspected by the Regulator of Social Housing and whilst the outcome of this will not be known until January 2026, it is anticipated that the regulator will expect to see improvements in the areas listed above.

- 2.5 It should be noted that adherence to the consumer standards can be disproportionately challenging for Councils with smaller Housing Revenue Accounts, as they have less economies of scale and limited digital transformation capacity.

3. Understanding the condition of the Council's homes

- 3.1 An understanding of the condition of the housing stock ensures that the Council can validate both the quality and safety of its homes as well as use the data to make intelligence-based investment plans for the future.
- 3.2 The new regulatory framework for social housing providers sets out an expectation that providers must have an accurate, up to date and evidenced understanding of the condition of their homes.
- 3.3 This has been achieved by the Council through a full programme of stock condition surveys to its properties. This work started in April 2024 and completed in July 2025, resulting in the known condition of 86% of the housing stock.
- 3.4 This evidence base will be maintained going forward by annual stock condition surveys of 20% of the housing stock.
- 3.5 The stock condition surveys undertaken included a safety assessment using the Housing Health and Safety Rating System (HHSRS). There are 29 causes of a hazard within HHSRS, and they are scored based on the likelihood of an occurrence of harm to an occupier. The scores determine the banding of a Category 1 or Category 2 severity, and legislation requires that housing providers take appropriate action.
- 3.6 In July 2023 the Social Housing (Regulation) Act 2023 passed into law, creating the legal framework for Awaab's Law. In June 2025, detailed rules were laid before Parliament that formed part of the Social Housing (England) Regulations 2025, better known as Awaab's Law, which came into effect in October 2025, introducing strict and mandatory timeframes in the management of damp and mould cases.
- 3.7 Tenancy Health Checks and the Stock Condition Survey identified damp and mould works, which is managed within PRS and had to be completed to keep our tenants safe and to comply with the law and social housing regulations.

4. Financial impact of identified remedial works

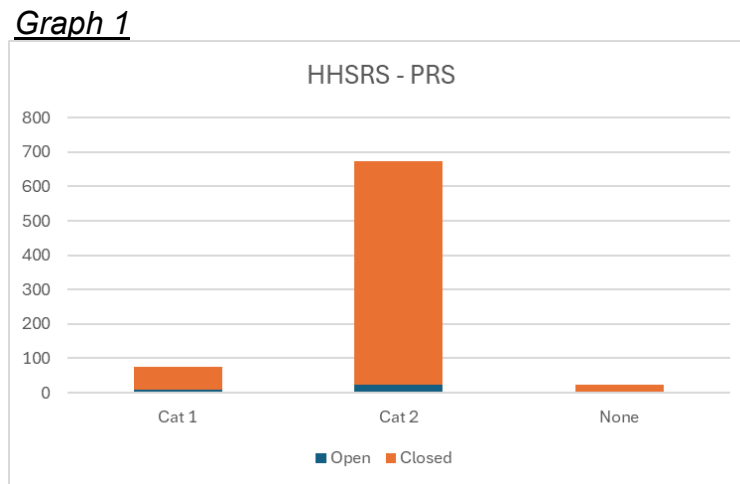
- 4.1 The table below demonstrates the financial impact of completing a large amount of complex works in a short period of time. The budget allocated to spend with external contractors was £0.850M but forecasting suggests that this needs to be £1.7m, which is an increase of £0.850M.

Description	Total Budget 2025/26	Expenditure	Commitments	Expenditure plus Commitments	Forecast	24.25 Actuals	Variance to Total Budget based on Expenditure	Variance to Total Budget based on Projection
	£	£	£	£	£	£	£	£
External Legal Costs	10,000	24,336	0	24,336	61,622	61,622	14,336	51,622
External Contractor & Operator	850,500	925,301	0	925,301	1,700,000	1,163,258	74,801	849,500
Internal Contractor	0	(907)	0	(907)	0	15,545	(907)	0

4.2 The table also shows the financial impact from last financial year with the spend being £1.1m against a budget of £0.350M.

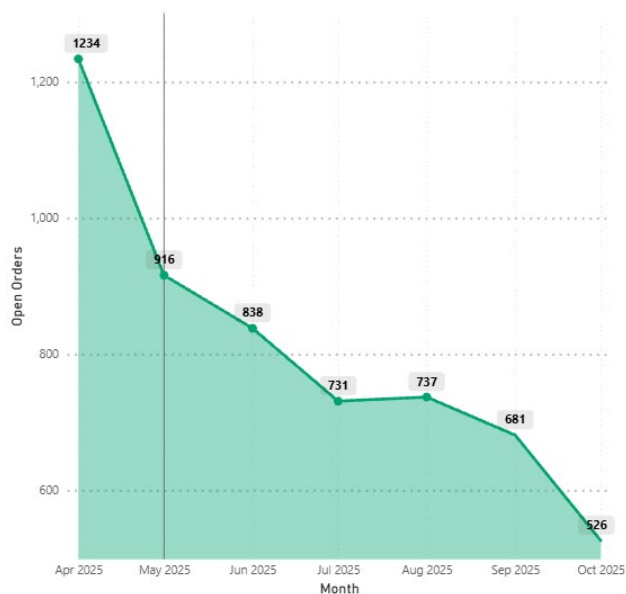
4.3 Graphs 1, 2 and 3 identify the achievements within PRS where they have cleared a large back log of complex and regulatory works, since the beginning of this financial year. It is to be noted that we cannot show these results for previous financial year as the KPI framework was not live then, so these items were not monitored.

Graph 1 – HHSRS current position, broken down by category. 771 HHSRS identified in PRS reduced down to 30.

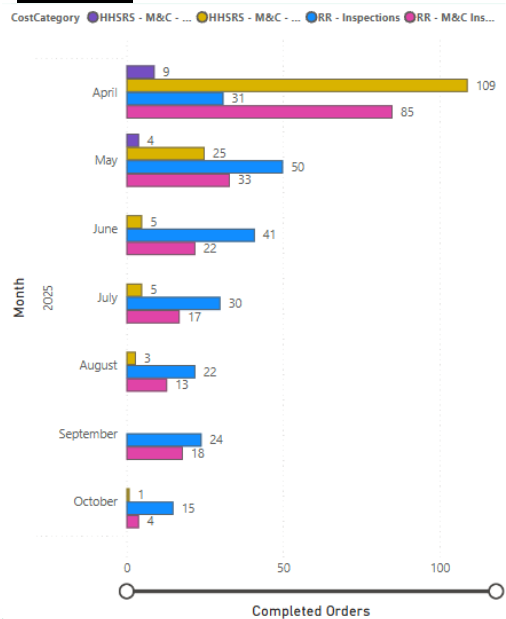


Graph 2 – Jobs in the Order Bank (reduction over time). This includes 160 jobs identified through Tenancy Health Checks.

Graph 2



Graph 3



Graph 3 – Mould & Condensation Inspections (reduction over time), identified through HHSRS, tenancy health checks and customer repairs.

5.0 The wider transformation journey

5.1 The transformation journey has been enabled by the increased self-awareness derived from the mock inspection in 2024 and the desire to ensure that tenants have an improved customer journey.

5.2 The transformation journey has focused on 6 themes:

- Operational policies and procedures
- An enhanced performance management framework
- Technology and systems
- Commercial and budget management
- Understanding resource requirements
- Establishing a single route to reporting repairs (goes live April 2026)

5.3 More detail, including the positive outcomes for tenants, is included in appendices 3 and 4

6.0 Conclusion

6.1 Significant progress has been made in ensuring that the Council provides safe and high-quality homes for its tenants, with an increasingly responsive repairs service

6.2 It should be noted however that there is more to do, and it is anticipated that the outcome of the recent inspection by the Regulator will inform further opportunities for improvement.

- 6.3 It should be noted that recommendation 1 of this report is an Executive matter for Cabinet and recommendation 2 is a Cabinet decision which must also be approved by Council.

Name of Meeting: Cabinet

Date of Meeting: 6 January 2026

Subject Matter: Transformation Journey Update - Assets & the Property Repairs Service

Originating Department: Communities and Homes

DO ANY BACKGROUND PAPERS APPLY

☐ YES

☒ NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
App 1	Climate Change and Environmental Impact assessment
App 2	Equality Impact Assessment
App 3	Transformation Project Update
App 4	Outcomes for Tenants

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Appendix 1

Transformation Journey Update – Assets and PRS

Rugby Borough Council

Climate Change and Environmental Impact Assessment

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action.

Rugby Borough Council declared a climate emergency in 2019 and the Council's Corporate Strategy (2025-2035) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions are further defined through the Council's Climate Change Strategy [link](#) and must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes greenhouse gas emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

To help you complete this assessment, please see the following guidance on SharePoint [here](#).

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to your Chief Officer for approval.

If you require help, advice and support to complete the form, please contact your Chief Officer.

SECTION 1: OVERVIEW

Portfolio and Service Area	Communities and Homes
Policy/Service/Change being assessed	The transformation of the Property Repairs Service and the Asset Maintenance Team and request for supplementary budget 2025/26 to support this.
Is this a new or existing Policy/Service/Change?	Change - neither the Property Repairs Service nor the Asset Maintenance Service are new services, but the bringing together of the two teams under the one Directorate is. This is in response to requirements introduced by the Social Housing Regulation Act (2023) and the Safety and Quality Consumer Standard of the Regulator of Social Housing (April 2024)
If existing policy/service, please state date of last assessment	N/A
Ward Specific Impacts	None
Summary of assessment Briefly summarise the policy/service/change and potential impacts	The bringing together of both Assets and the Property Repairs Service under the one directorate is not expected to have any detrimental impact to either the environment or climate.
Completed By	Peter Nicholas / Rob Foster
Authorised By	
Date of Assessment	November 2025

SECTION 2: GREENHOUSE GAS EMISSIONS

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Scope 1 Emissions Direct emissions from council owned resources, for example through boilers or vehicles.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Scope 2 Emissions Indirect emissions occurring at the location energy is produced for council activities. For example, electricity generation for council buildings.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 3: CLIMATE CHANGE STRATEGY

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Workplaces and the Economy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The bringing together of the two teams under the one directorate, is already showing improvements in the service offering provided by RBC.	None	N/A	
Transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Natural Environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Homes and Energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Waste, Resources and the Circular Economy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Climate and Nature Positive Communities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 4: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	November 2025
Key points to be considered through review	N/A
Person responsible for review	Peter Nicholas / Rob Foster
Authorised by	Michelle Dickson

Appendix 2 Transformation Journey Update – Assets & PRS

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers

Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	Communities and Homes
Policy/Service being assessed	The transformation of the Property Repairs Service and the Asset Maintenance Team and request for supplementary budget 2025/26 to support this.
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	Neither the Property Repairs Service nor the Asset Maintenance Service are new services, however they are responding to requirements introduced by the Social Housing Regulation Act (2023) and the Safety and Quality Consumer Standard of the Regulator of Social Housing (April 2024)
EqlA Review Team – List of members	Rob Foster – Repairs and Voids Manager Peter Nicholson – Asset Maintenance Manager Nic Holman – Ark Consultant Mary Jane Gunn, Communities and Projects Manager
Date of this assessment	November 2025
Signature of responsible officer (to be signed after the EqlA has been completed)	

A copy of the completed and signed Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Officer.

Details of Strategy/ Service/ Policy to be analysed

<p><u>Stage 1 – Policy to be analysed</u></p>	<p>The transformation of the Property Repairs Service and the Asset Maintenance was set in train by the Mock Inspection of RBC's housing service in late 2024.</p> <p>It was identified that structural changes, systems changes/improvements, cultural changes and a range of additional measures including a new performance framework and adoption of new compliant policies, procedures and processes would be necessary to ensure compliance with the Safety and Quality Standard of the Regulator of Social Housing and other regulation and legislation.</p>
<p>(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?</p>	<p>The purpose of this initiative is to provide assurance that our tenants are safe, and our homes and services are of high quality.</p>
<p>(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?</p>	<p>The policy contributes to the following outcomes of the Corporate Strategy 2025-2035:</p> <ul style="list-style-type: none"> • A Fairer Rugby - To reduce inequalities and improve housing across the borough <p>The Corporate Strategy Delivery Plan 2025-26 sets out that we will:</p> <p>Deliver a programme to transform the delivery of landlord services. With the following deliverables:</p> <ol style="list-style-type: none"> a) A clear plan for service transformation b) A new asset management system that integrates with the housing management and repairs systems c) Efficiencies in delivering responsive and quality landlord services d) A service offer better understood by tenants <p>Rationale: The reasons for the programme scope and deliverables are as follows:</p> <ol style="list-style-type: none"> a) Improved and more responsive services for our tenants b) Increase productivity through increasingly efficient processes.

(3) What are the expected outcomes you are hoping to achieve?

- The safety of our tenants including safety from hazards and delivery of an effective, efficient and timely repairs service.
- Regulatory and legislative compliance - RBC is committed to complying with all relevant legislation and guidance including the Social Housing (Regulation) Act 2023, the Safety and Quality Standard of the Regulator of Social Housing and secondary legislation set out as Awaab's Law (which will be extended in 2026 and 2027 to cover hazards additional to damp & mould)
- Operational efficiency.
- Value for Money: We are committed to delivering repairs and maintenance services that offer fair value for money, ensuring that resources are used efficiently and seeking continuous improvement in our repairs and maintenance service by reviewing the service at regular intervals.
- Sustainability: We will consider energy efficiency and environmental sustainability when undertaking repairs and planned maintenance.

<p>(4) Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>RBC tenants will be affected by this initiative. It will have significant benefits in improving our repairs and maintenance services including improved access to the service. A range of measures/improvements have been delivered by this initiative including:</p> <ul style="list-style-type: none"> • A performance framework – Ensuring transparency to our tenants on the performance of the Landlord Service. • New robust and compliant policies and procedures, that will improve outcomes for tenants. • Specification and procurement of a new asset system that will enable a full understanding of our stock condition, enabling data driven decisions on planned works and improvements. <p>The measures described will also have a positive impact on employees:</p> <ul style="list-style-type: none"> • A performance framework will enable employees to direct their resources appropriately and understand when improvements are required and what is going well. • Robust policies and procedures will enable employees to work within a clear framework of expectations. • The new asset management system will reduce time consuming manual processes.
<p>(5) Will the policy or decision involve substantial changes in resources?</p>	<p>A supplementary budget is requested in 2025/26 to support the transformation of the service and compliance with regulation and legislation. .</p>
<p><u>Stage 2 – Evidence about user population and consultation</u></p>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>

(1) What does the data tell you about the groups this policy or decision impacts?

Possible data sources:

- national statistics/census data
- local statistics
- evaluations
- analysis of complaints
- user feedback
- outcomes from consultation/community voice
- Council published information, service data
- [District and Ward Profile – Warwickshire Observatory](#)
- [Office of National Statistics](#)
- [Fingertips health profiles](#)
- [Indices of Multiple Deprivation](#)
- [RBC Annual Workforce Equality Report](#)

As of 31 March 2025, Rugby Borough Council owns and manages around 3,400 homes, including around 1,200 properties in its Independent Living Schemes (primarily for older tenants with enhanced housing management services) We maintain tenants' information within our housing management system.

Asset types:

- Bedsit
- Bungalow
- Flat
- House
- Maisonette

Along with a status of :

- Under Agreement
- Void
- Non Lettable

Our tenant data is currently being improved by a programme of tenancy health checks which will improve the information we hold on protected characteristics of our tenants.

A data project scheduled for 2025/26 will review data currently available and put a plan in place to improve that data primarily through "Settling In Visits" (with new tenants) and Tenancy Health Checks (with all tenants).

<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	<p>Tenants have been involved in 2025 through both the Tenants Panel (scrutinising performance using the new performance framework) and the Safety and Quality Tenants Group who have influenced:</p> <ul style="list-style-type: none"> New compliance policies (Asbestos, Lifts, Legionella, Gas Safety, Elec Safety, Fire Safety, D&M) and the Repairs & Maintenance Policy <p>Policies had a range of changes following tenant consultation including adding timescales, changes in tone and clarification of staff responsibilities.</p> <p>Appendix 3 to this report – The Transformation of PRS & Assets was considered by the Tenants Panel at its meeting of 19 November 2025.</p>		
<p>(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	N/A		
<p><u>Stage 3 – Analysis of impact</u></p>			
<p>(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	<p>Protected Characteristic</p>	<p>Nature of Impact Positive, Neutral, Adverse (explain why)</p>	<p>Extent of impact Low, medium, high</p>
	Age	Neutral	Low
	Disability	Neutral	Low
	Sex	Neutral	Low
	Gender reassignment	Neutral	Low
	Marriage/civil partnership	Neutral	Low

	Pregnancy/maternity	Neutral	Low
	Race	Neutral	Low
	Religion/belief	Neutral	Low
	Sexual Orientation	Neutral	Low
(2) Cross cutting themes (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Positive – the policy positively impacts quality of life for tenants through well-maintained homes and contributes to health and safety by addressing disrepair promptly.	Low
	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution	Positive - encourages sustainable practices, as part of RBC Corporate Strategy 2025-2035.	Low

<p>(3) Using the information gathered in stages 2 and 3, please describe how the policy/strategy/service will:</p> <ul style="list-style-type: none"> a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic 	<p>The policy applies consistently to all tenants, ensuring that no individual is disadvantaged based on any protected characteristic. It complies with legal requirements, promoting fair and equal service delivery without discrimination.</p>
<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>	<p>N/A</p>
<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>Equality monitoring data is collected through tenant health checks and the housing application process. This includes information on tenants' protected characteristics, such as age, disability, gender, ethnicity, and any additional support needs. The data is stored securely within the council's system.</p>

<p>(6) Complete this section if any adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.</p>	N/A
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<u>Stage 4 – Action Planning, Review and Monitoring</u>	
<p>(1) Data analysis What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?</p> <p>The feedback/data should be used to inform your Action Plan in (2)</p>	The policy does not specifically target any protected characteristic.

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1"> <thead> <tr> <th>Action</th> <th>Lead Officer</th> <th>Date for completion</th> <th>Resource requirements</th> <th>Comments</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(3) Review and Monitoring</p> <p>State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>	<p>This initiative will be reviewed annually in line as part of our preparedness for inspection by the RSH.</p>																													

Please annotate your policy with the following statement:

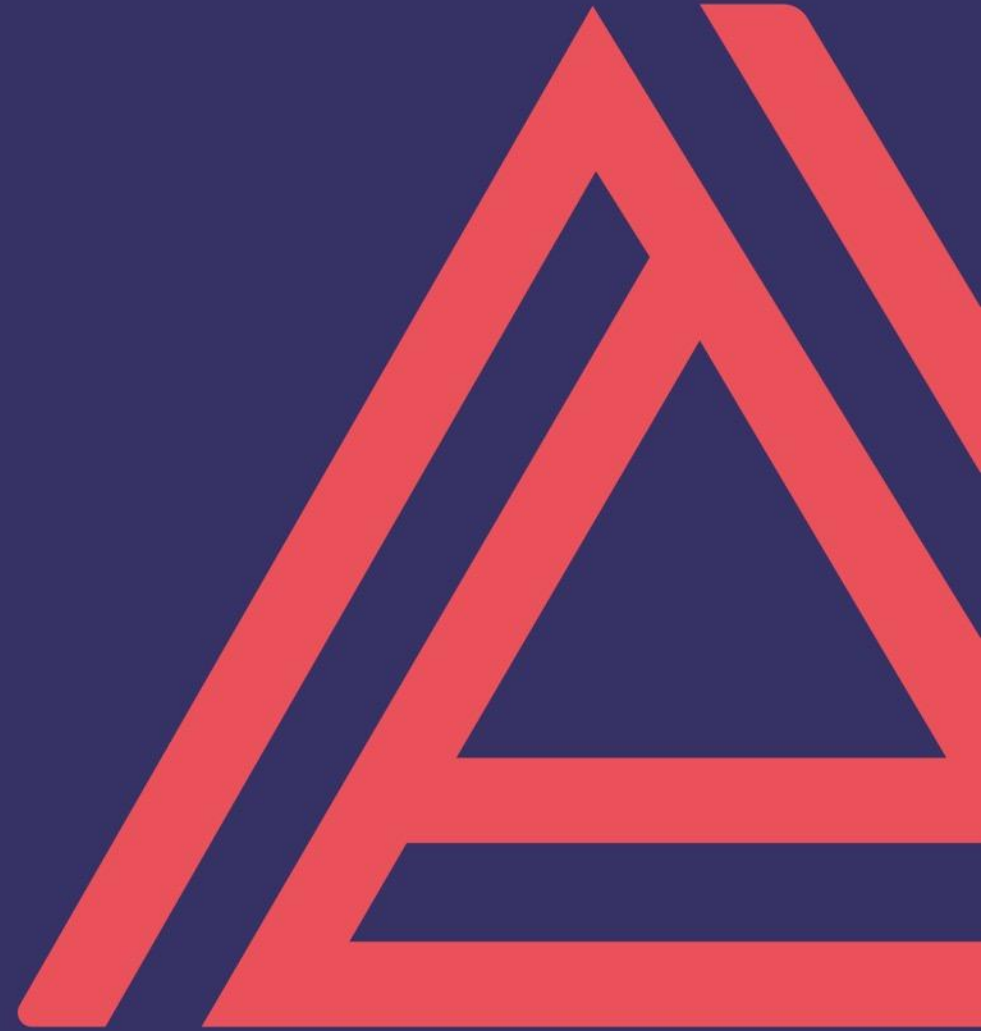
An Equality Impact Assessment on this initiative was undertaken on 17 November 2025 and will be reviewed in November 2026.



Transformation Project

17th November 2025

Nicola Holman



Project Outcomes Agreed

- **Performance**

- To build a KPI framework that is managed through a tier of management within Rugby Borough Council.
- Document operational maintenance in policies and procedures, detailing roles and responsibilities of teams involved.

- **Technology & Systems**

- Introduce an Asset Management Software that integrates with other systems to support operational delivery and regulatory compliance.

- **Commercials**

- Ensure maintenance spend is compliant with Public Contract Regulations, demonstrating value of money within HRA spend.
- Strengthen contract management with external suppliers, building partnerships to ensure alignment in service deliverables and obtaining value for money.
- Evaluate budgets required to strengthen property investment, providing teams with adequate financial support in order to deliver their service in line with the decent homes standard and social housing regulations.

- **Structure**

- Allocate the resource required to deliver the service, defining roles and responsibilities to remove duplication and determine training through gap analysis.



Transformational Achievements To Date

KPI Performance Framework

- KPI performance framework designed and approved (April 2025)
- Governance team members and meetings launched to review results monthly (May 2025)
- Power BI dashboard built and published (June 2025)
- Performance Risk and Assurance members agreed and meeting launched quarterly (Q1 – July 2025)
- Tenant panel – KPI Performance added to agenda and discussed quarterly (Q1 – August 2025)
- Health & Safety Committee – KPI Performance added to agenda and discussed quarterly (Q1 & Q2 – November 2025)
- Outcomes of KPI monitoring below:

KPI Description	P1	P6	Direction	Movement	
Damp and Mould Inspections within target	25.00%	64.70%	Improved	39.70%	
Damp and Mould remedial work completed within target	57.10%	52.20%	Worsened	-3.50%	
Damp and Mould Inspections in WIP	231	27	Improved	204	
Cat 1's Open in PRS	41*	9	Improved	32	
Cat 2's Open in PRS	406*	54	Improved	352	
Work in Progress	1063	748	Improved	315	
% of WIP overdue	79.6%	49.6%	Improved	30.0%	
Emergencies within target	83.30%	100%	Improved	16.7%	
Non-Emergency Repairs within target	72.30%	81.50%	Improved	9.20%	
Minor Voids completed on time (%)	100%	100%	Unchanged	-	
Standard Voids completed on time (%)	77.8%	100%	Improved	22.2%	
Major Voids completed on time (%)	100%	50%	Worsened	-50.0%	
Average time to answer calls	02:03	01:34	Improved	00:29	
Abandoned Calls	25.0%	17.20%	Improved	7.80%	



Transformational Achievements To Date

Operational Policies & Procedures

- Seven compliance related policies created and approved in Q1. They are:
 - Legionella
 - Lift Management
 - Fire Safety
 - Gas safety
 - Electrical Safety
 - Asbestos Management.
- Repairs & Maintenance Policy and the Damp and Mould Policy created and approved in Q2
- Sixteen operational procedures identified for creation and launch. Achievements to date are:
 - Follow on Procedure; creates efficiencies in tighter turnaround times, reducing average time to complete a repair.
 - Damp & Mould; this includes system changes to support diagnostics and timelines, aligned with Awaab's Law
 - No Access; this includes system changes to count visit to determine action, strengthening tenancy management

Technology & Systems

- Procurement of a new Asset Management system complete (August 2025)
- Project kick off for new Asset Management System. This include the migration of repairs and voids into the system and the integration of Total Mobile & Agresso (September 2025)
- Additional phone line into the PRS team launched to further support customers (October 2025)
- Data cleanse in progress (November 2025)



Transformational Achievements To Date

Commercials

- Procurement Pipeline drafted, based on historical spend and aligned to the proposed HRA 30-year business plan (October 2025)
- Commercial Manager appointed to finalise and implement Procurement Pipeline in partnership with CHIC (November 2025)
- Builders merchant tender launched, and supplier awarded. Anticipated cost savings of 2.6% of existing material spend (Sept-November 2025)
- First draft of new Budget Structure proposed for new financial year, providing clear ownership and accountability within teams (November 2025)
- The introduction of SOR's with contractors within the maintenance teams. Industry standard dictates a minimum of a 20% saving on spend with contractors when scoping works using these codes (November 2025)
- The introduction of finance reports, meetings and timetables within PRS to ensure an understanding on budget position within the teams, collaboratively working with the Finance Business Partner (September 2025)

Structure Changes

- Survey released and CV's assessed to identify required roles and responsibilities (April 2025)
- Proposal for structure alignment designed for future consideration (May 2025)
- Cost analysis performed on structure proposal for further benefit realisation (October 2025)
- Appointment of a new Repairs & Voids Manager with technical experience to lead and manage the team, with 25 years of experience in construction and property maintenance (October 2025)
- Post transferred from the contact centre to PRS to accommodate one repairs reporting service (October 2025)



Future Transformation Achievements Planned

Operational Procedures

- Asset Referral Procedure; workshop held, draft procedure and asset referral form – In Progress
- Voids end to end Procedure; workshop held and managerial approval required to move forward – In Progress
- Out of Hour Procedure; workshop held, lone working devices distributed, trial to obtain cost benefits - November to December – In Progress
- Ten remaining procedures will be handed to Communities & Projects to support future delivery.
- Case management within Civica CX has been designed. Training and the launch of it's use for HHSRS and No Access is pending launch.
- PRS and Asset will move to the same office space to strengthen collaborative working. Working group will take the office move forward. Launch of the team in progress.

Technology & Systems

- Go live of Total Mobile for Voids, Compliance and Asset repairs, Asset Management system and integration – due April 2026
- Repairs calls into one central location – due April 2026



Future Transformation Achievements Planned

Commercials

- HRA 30 year business plan to be approved and launched. First draft received and discussions underway. Proposal to launch anticipated for Q2 26/27
- Mobilise van stocks and material catalogues in line new builder's merchant contract, bringing efficiencies through productivity, system integration and the availability of core stock. Target completion April 2026
- Secondary materials contract award to support the supply of plumbing materials. Anticipated cost savings of 29.63% if awarded to City Plumbing Suppliers. Target completion April 2026
- Introduction of new contracts with compliant suppliers, improving service and costs – benefit realisation 12 months from each contract award date.
- Contract Management strengthened through support of the Commercial Manager and the introduction of quality assurance checks. Teams will learn how to create robust partnerships, service level agreements and supplier relationship management protocols. Benefit realisation 12 months from contract award dates and launch of QA programme.
- Budget setting work continues to support the restructured proposal with growth bids proposed to move existing funding into the right places. Anticipated completion February 2025.



Thank you and please contact us if you
would like to discuss further

Nicola Holman

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Appendix 4

Transformation Journey Update – Assets and PRS

Tenant Outcomes

The **Safety & Quality Standard** of the Regulator of Social Housing sets out required outcomes and specific expectations that registered providers must achieve.

The standard can be found online at
<https://www.gov.uk/government/publications/safety-and-quality-standard>

The purpose of our transformation journey is to improve outcomes for tenants. This table sets out a summary of improved outcomes for tenants to date.

1. PERFORMANCE

Milestone	Date Commenced	Outcomes for Tenants
KPI framework designed and approved	April 2025	Provides a basis for monitoring delivery of “safe and good quality homes” and “effective landlord services – Provides transparency to tenants, enabling tenants to hold RBC to account.
Tenant panel – KPI Performance added to agenda and discussed quarterly	Q1 – August 2025	Supports tenant involvement and transparency - aligning with the wider regulatory expectation of tenant voice and information and enabling scrutiny of how performance impacts tenants. Enables tenants to hold RBC to account and actively participate in service improvement.

Tenant Facing OPERATIONAL POLICIES & PROCEDURES Adopted 2025/26

Policy	Status	Outcomes for Tenants
Legionella	Approved Q1	Clear policies that set out to tenants the way in which we will take all reasonable steps to ensure the health and safety of tenants in their home and associated communal areas.
Lift Management	Approved Q1	
Fire Safety	Approved Q1	
Gas Safety	Approved Q1	
Electrical Safety	Approved Q1	
Asbestos Management	Approved Q1	
Repairs & Maintenance	Approved Q2	Clear timescales set for completion of repairs, maintenance and planned improvements , communicated

		through the tenants newsletter and the RBC website.
Damp and Mould Policy	Approved Q2	Policy and supporting procedure enable RBC's compliance with Awaab's Law ensuring that tenants are protected from hazards and have clear and timely communication on how hazards in their home will be addressed and the impact on them mitigated.
Aids and Adaptations Policy	Approved Q2	Clear guidance provided on how RBC will assist tenants seeking housing adaptations to their homes.

Sixteen operational procedures identified for creation and launch. Achievements to date include:

- "Follow on" Procedure: creates efficiencies in tighter turnaround times, reducing average time to complete a repair.
- Damp & Mould Procedure: this includes system changes to support diagnostics and timelines, aligned with Awaab's Law
- No Access Procedure: this includes system changes to count visits attempted to determine action, strengthening tenancy management.

Outcomes for tenants include:

- **The safety of tenants is considered in the design and delivery of landlord services.**
- **RBC identifies and meets legal requirements relating to the health and safety of tenants in their homes and communal areas.**

2. TECHNOLOGY & SYSTEMS

Milestone	Date	Outcomes for Tenants
Procurement of a new Asset Management system	August 2025	Supporting an accurate, up to date and evidenced understanding of the condition of RBC homes.
Project kick off for new Asset Management System. This include the migration of repairs and voids into the system and the integration of Total Mobile & Agresso	September 2025	Supporting the provision of an efficient, effective and timely repairs, maintenance and planned improvement service.
Additional phone line into the PRS team launched to further support customers	October 2025	Ensuring tenants can report repairs and maintenance issues easily.

3. COMMERCIALS & VALUE FOR MONEY

Milestone	Date	Outcomes for Tenants
Procurement Pipeline drafted, based on historical spend and aligned to the proposed HRA 30-year business plan	October 2025	The delivery of repairs, maintenance and planned improvements to homes is informed by the needs of tenants and provides value for money.
Commercial Manager Appointed to finalise and implement Procurement Pipeline in partnership with CHIC	November 2025	Materials and works are procured more efficiently. This helps reduce delays and improves the overall quality of service delivery.
Builders merchant tender launched, and supplier awarded. Anticipated cost savings of 2.6% of existing material spend	September - November 2025	Savings on material costs help protect investment in homes and can be reinvested into repairs and improvements.
Introduction of Schedule of Rates's with contractors within the maintenance teams. Industry standard estimates a minimum of a 20% saving on spend with contractors when scoping works using these codes	November 2025	Better value for money across repairs services.
First draft of new Budget Structure proposed for new financial year, providing clear ownership and accountability within teams	November 2025	Clear team responsibilities. Teams respond more effectively to tenant needs and prioritise resources where they are most needed. This supports transparency and long-term service planning.

4. OPERATIONAL PROCEDURES DEVELOPMENT

Procedure	Status	Outcomes for Tenants
Void end to end procedure; workshop held in order to improve processes and procedure.	In Progress	Void properties are safe and decent before re-let, supporting the provision of good quality, well maintained and safe homes for tenants.

Review of the Lettable Standard with tenants.

Out of Hour Procedure; workshop held, lone working devices distributed, trial to obtain cost benefits - November to December 2025.	In Progress	Addresses lone-worker safety and supports responsiveness outside normal hours, contributing to safe, reliable services.
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5. TENANT-FOCUSED OUTCOMES - SUMMARY

- **Safe, good-quality homes:** Through comprehensive safety policies (gas, electrical, fire, asbestos, lifts) and asset management, we aim to deliver the good quality, well maintained and safe homes for tenants
- **Timely, effective repairs & maintenance:** By establishing clear procedures, centralised reporting and timely follow-up through technology and resources, we aim to meet the requirement to provide “an effective, efficient and timely repairs, maintenance and planned improvements service”.
- **Transparent service delivery and accountability:** Through KPI monitoring, tenant panel involvement and management oversight, we promote transparency - enabling tenants to hold RBC to account in how their homes are managed and maintained. While the Safety and Quality Standard focuses on safety and quality, this approach supports the broader regulatory intent.
- **Long-term stock condition management:** With asset management software, physical assessments, data cleansing and structured procedures, we work towards maintaining an “accurate, up to date and evidenced understanding of the condition of their homes at individual property level.
- **Value for money and sustainable service delivery:** Through procurement strategy, cost savings and long-term planning, we aim to ensure resources are used efficiently - enabling continuous compliance and service

AGENDA MANAGEMENT SHEET

Report Title:	Warwickshire Joint Statement of Intent to Tackle Homelessness
Name of Committee:	Cabinet
Date of Meeting:	6 January 2026
Report Director:	Chief Officer - Communities and Homes
Portfolio:	Communities and Homes, Regulation and Safety
Ward Relevance:	All
Prior Consultation:	Rugby Homeless Forum, Portfolio Holder, Liberal Democrat housing representative; Warwickshire Heads of Housing and Warwickshire Housing Board
Contact Officer:	Daniel Khan - Housing Advice and Enabling Manager (daniel.khan@rugby.gov.uk)
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	No
Forward Plan:	Yes
Corporate Priorities:	<p>This report relates to the following priority(ies):</p> <p><input checked="" type="checkbox"/> A Healthier Rugby – To support people to live healthier, longer, and more independent lives.</p> <p><input type="checkbox"/> A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.</p> <p><input type="checkbox"/> A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.</p> <p><input checked="" type="checkbox"/> A Fairer Rugby – To reduce inequalities and improve housing across the Borough.</p> <p>Corporate Strategy 2025-2035</p> <p><input type="checkbox"/> This report does not specifically relate to any Council priorities but</p>
Summary:	This report seeks Cabinet approval for the Warwickshire Joint Statement of Intent to Tackle Homelessness (appendix 1). The Statement sets out a collaborative approach to preventing and reducing homelessness across the county, aligning

with statutory duties and Rugby Borough Council's corporate priorities.

Financial Implications:	There are no financial implications arising from this report.
Risk Management/Health and Safety Implications:	<p>The Statement of Intent sets out a collaborative approach to councils working together to prevent and reduce homelessness across Warwickshire.</p> <p>The key risks relate to the increasing number of households at risk of homelessness and the associated health and safeguarding concerns.</p> <p>The risks will be managed through early intervention, tailored support and multi-agency working. Progress will be tracked by the Housing Partnership Board.</p>
Environmental Implications:	There are no Environmental Implications
Legal Implications:	The 2002 Homelessness Act places a duty on Local Authorities to prepare a Homelessness Strategy based on a review of homelessness in their area. The strategy must be renewed every 5 years. This Statement of Intent will help to support the delivery of the objectives of Rugby Borough Council's Homelessness and Rough Sleeping Strategy 2025-29.
Equality and Diversity:	An Equality Impact Assessment has been completed and forms appendix 2 to this report
Options:	<ol style="list-style-type: none">1. Adopt the proposed statement.2. Reject the proposed statement and action plan and commission officers to present a revised version for consideration at a future meeting of Cabinet
Recommendation:	The Warwickshire Joint Statement of Intent (appendix 1), setting out how the Warwickshire Councils will work collaboratively to tackle homelessness be approved
Reasons for Recommendation:	Approval ensures a coordinated, evidence-based approach to homelessness prevention and supports compliance with statutory duties. It aligns with corporate priorities and strengthens partnership working

Cabinet - 6 January 2026

Warwickshire Joint Statement of Intent to Tackle Homelessness

Public Report of the Chief Officer - Communities and Homes

Recommendation

The Warwickshire Joint Statement of Intent (appendix 1), setting out how the Warwickshire Councils will work collaboratively to tackle homelessness, be approved

1. Executive Summary

- 1.1 The district and borough Councils work in collaboration with the County Council to address issues of homelessness, and its prevention across Warwickshire.
- 1.2 To understand the value of the additional capacity offered by working together, it is first worth considering the local context, specific to Rugby:
 - During 2024/25 the Council has received an average of 23 approaches from households seeking housing / homelessness advice each week.
 - As of November 2025, there are 62 households in temporary accommodation
 - There is an average of 15 people who are rough sleeping in the borough at any time.
 - The waiting list for housing in the borough is dynamic, changing week by week, and is approximately 500 households.
- 1.3 The Warwickshire Joint Statement of Intent sets out how the councils work together, in response to issues of homelessness, and the priorities that they will seek to address through collaboration.
- 1.4 The work carried out under the joint statement of intent aligns, and adds value to, achieving the corporate objectives of Rugby Borough Council and the priorities of the Council's recently adopted Homelessness and Rough Sleeping Strategy (2025-2029).
- 1.5 The Statement of Intent continues the joined-up working established under the former Warwickshire Homelessness Strategy (2021), which has now been replaced by strategies at a district and borough level.
- 1.6 These localised strategies reflect localised needs and priorities, and have been developed at a local authority level, in compliance with the requirements of the Homelessness Act 2002.

- 1.6 A collaborative approach has been taken to develop the objectives of the county wide statement of intent, which will be overseen by the Housing Partnership Board. This is a countywide homelessness steering group, with an emphasis on improving health, made up of senior housing leaders from the districts and boroughs as well as health and social care leads from the County Council.

2. Introduction

- 2.1 The 2002 Homelessness Act places a duty on Local Authorities to prepare a Homelessness Strategy based on a review of homelessness in their area. The strategy must be renewed every 5 years.
- 2.2 The Statement of Intent adds value to this as it sets out the issues that are common across the county and would benefit collaborative working, in recognition of the benefits of the close links between health and homelessness.
- 2.3 The plan is for the Statement of Intent to be reviewed after two years to ensure that it remains relevant and targets the appropriate priorities.

3. Key Themes and Evidence

- 3.1 The proposed Statement of Intent identifies five priority areas:
- Health: Address health inequalities and maintain hospital liaison and outreach nursing services.
 - Prevention: Focus on early intervention, financial inclusion, and tenancy sustainment.
 - Domestic Abuse: Ensure safe accommodation and consistent countywide service offer.
 - Offenders: Provide housing solutions to reduce reoffending risk (79% reconviction if homeless).
 - Demand & Supply: Respond to housing shortages, affordability issues, and legislative changes
- 3.2 The commitment to work collaboratively to address these issues remains strong, as it is an opportunity avoid duplication, increase efficiency, generate better outcomes for the cohort and strengthens the ability to influence regional and national policy in respect of homelessness and health through a collective voice.
- 3.3 Across Warwickshire, the evidence shows that the main causes of homelessness are consistent in every district and borough and reflect the national trends:
- * family and friends no longer willing or able to accommodate,
 - * domestic abuse (accounting for 27.6% of relief duty cases),
 - * and the end of private rented sector tenancies.

This shared pattern underlines the need for collaborative solutions and coordinated interventions across the county.

4.0 Governance and Reporting Requirements

- 4.1 The Warwickshire Joint Statement of Intent to Tackle Homelessness 2025 is not a policy listed in the Council's Constitution requiring approval by Full Council. Therefore, it falls within the remit of the Executive.
- 4.2 Benchmarking against previous practice in Warwickshire (2021), similar reports were presented to Cabinet for noting to ensure transparency and alignment with strategic objectives. This approach provides a formal record of the Council's position and informs Scrutiny of the strategy for potential inclusion in its work programme.
- 4.3 This report updates Cabinet on the Warwickshire Joint Statement of Intent 2025 and sets out how Rugby Borough Council will use the Statement to influence its own Homelessness and Rough Sleeping Strategy (2025–2029). It also confirms the Council's commitment to continued partnership working with the Warwickshire Homelessness Strategic Group.

5 Conclusion

- 5.1 The Warwickshire Joint Statement of Intent builds on the strong partnerships and collaborative work established under the 2021 countywide homelessness strategy.
- 5.2 It reinforces the commitment of all district and borough councils to work together while delivering individual homelessness and rough sleeping strategies that meet local needs and statutory requirements.
- 5.3 Collaborative working remains essential to address shared challenges such as health inequalities, domestic abuse, and housing supply pressures, ensuring consistent standards and efficient use of resources across the county.
- 5.4 The Statement of Intent provides a framework for joint action planning and monitoring through the Housing Partnership Board, enabling partners to share best practice and respond effectively to emerging issues.
- 5.5 Regular review of progress and evidence will ensure that resources are aligned to deliver outcomes that prevent homelessness, reduce rough sleeping, and improve health and wellbeing for residents.

Name of Meeting: Cabinet

Date of Meeting: 6 January 2026

Subject Matter: Warwickshire Joint Statement of Intent to Tackle Homelessness

Originating Department: Communities and Homes

DO ANY BACKGROUND PAPERS APPLY

☐ YES

☐ NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Warwickshire Joint Statement of Intent to Tackle Homelessness

Draft v.5.0



Intention

Homelessness is a complex issue that requires a comprehensive and collaborative approach for both prevention and resolution. The statutory services in Warwickshire came together in 2021 to establish a joint strategy to direct a partnership approach to tackling homelessness. This Statement of Intent seeks to make a commitment to continue with the co-ordination of information and partnerships which have been productively developed to serve the needs of our residents.

This Joint Statement of Intent builds on the Strategy published in 2021; *Preventing Homelessness in Warwickshire: a multi-agency approach*. It underscores our collective commitment to addressing homelessness through innovative, evidence-based solutions and by leveraging the strengths and resources of all partners involved. By combining our expertise, knowledge, and resources, we aim to not only provide relief to those in crisis but also to address the root causes of homelessness, ensuring sustainable and long-term solutions.

The Statement will be in place from the date of agreement until the arrangements for Local Government reorganisation are decided and will be reviewed after two years in any event.

Focus on Health

We recognise and will seek to reduce access inequalities and improve the health of people at risk of homelessness, homeless or sleeping rough.

To do this we will:

Continue to use the Housing Partnership Board to work closely with and influence the Care Collaborative Forum by co-ordinating data about the prevalence of homelessness and reflect on the Joint Strategic Needs Assessment information to give direction to the delivery of health services to homeless households

To act as partners of the Warwickshire Adults Safeguarding Board to understand the extent and reasons for rough sleeping in the County and to use a range of interventions to reduce safeguarding risks, improve well being and engage the Integrated Care Board in the provision of health services.

Work with Warwickshire County Council's Social Care, Integrated and Public Health Commissioners to inform commissioning activity so that the commissioned services with joint health and homelessness interdependencies are best equipped to meet local need.

Reflect on the information provided from information returns to Government and findings in national and local reports and use the data to proactively seek interventions to remove barriers for homeless households to access health services and sustain them when they are successful

Focus on Prevention

To reduce the need for temporary accommodation we will provide services which seek to address homelessness proactively.

To do this we will:

Fully utilise commissioned support services and those in the voluntary sector to sustain tenancies with migration teams providing housing options to prevent homelessness.

Provide proactive financial inclusion services to address debt and income reasons for homelessness

Use briefings and training to encourage full engagement with Duty to Refer requirements to increase access to early advice and support to offer prevention solutions and to engage collaboratively to deliver resolutions. This will include urging organisations who do not have a duty to co-operate with early alert good practice to use the referral mechanism.

Focus on Domestic Abuse

We will provide strong partnership interventions to address domestic abuse.

To do this we will:

Fully engage with the countywide published strategic intentions directed by the Domestic Abuse and Sexual Assault Partnership Board and with MARAC arrangements.

Work across the County to provide safe accommodation to meet the needs of those who cannot remain at home whilst acting to support households to sustain their accommodation where it is safe to do so.

Provide dedicated staff with relevant expertise to provide housing options and support to those suffering domestic abuse and to make a consistent service offer across the County.

Focus on Offenders

We recognise the barriers that offenders have in accessing appropriate accommodation.

To resolve this we will:

Commit to regular multi agency meetings to provide a range of housing solutions for offenders

Work closely with the Prison and Probation Services to understand individual needs in advance of release

Fully utilise the Multi Agency Public Protection Arrangements to seek joint action to protect the public by finding suitable housing for high risk offenders

Focus on Demand and Supply

The evidence that informs this statement indicates a gap between those seeking assistance because of homelessness and the supply of affordable accommodation available to meet their needs.

To resolve this we will:

Work locally and collaboratively when we can to understand both the issues in housing supply and how we can act to address that.

Work closely with Private Registered Landlords to deliver new homes and supported housing schemes to meet the needs of our residents

Co-ordinate our engagement with the Government's new legislation to improve the quality of supported accommodation and to respond to the anticipated Renters Rights legislation.

Duty on All Partners

The Homelessness Reduction Act 2017 placed a duty on public bodies, such as hospitals, probation and prisons, to refer individuals who are homeless or at risk of homelessness to housing authorities at the earliest opportunity. The Countywide Homelessness Strategy 2021 provided a focus for partners to deliver the duty productively.

This Statement of Intent aims to progress the strong partnership arrangements that have been developed in the last 5 years. They are needed more than ever as front line staff face an increasingly challenging environment in which they are expected to prevent and resolve homelessness.

The need for joint action, recognising that early intervention and prevention cannot be achieved by the housing authority alone, is more apparent than ever. All organisations need to collaborate and act with local authorities to avoid the need for crisis intervention.

There is a two-tier local government structure in Warwickshire.

District/Borough Councils: The primary responsibility for housing and homelessness lies with the five district and borough councils: Nuneaton and Bedworth Borough Council, North Warwickshire Borough Council, Rugby Borough Council, Stratford District Council, and Warwick District Council. Each council has a Homelessness Strategy that identifies the local priorities and how partners will tackle homelessness.

Housing authorities have several key responsibilities when it comes to addressing homelessness. These responsibilities are guided by legislation including the Homelessness Reduction Act 2017 and the Housing Act 1996.

Duty to Provide Advice and Information: Housing authorities are required to offer free advice and information about homelessness and its prevention. This advice must be tailored to meet the needs of vulnerable groups, such as young people, victims of domestic abuse, and those with mental health issue.

Prevention Duty: Housing authorities must take steps to prevent homelessness for individuals and families who are at risk. This involves working with those at risk to develop a personalised housing plan and providing support to help them stay in their current accommodation or find alternative housing.

Relief Duty: If someone is already homeless, housing authorities have a duty to help them secure accommodation. This support is provided for a period of 56 days, during which the authority works with the individual to find suitable housing.

Main Housing Duty: If homelessness cannot be prevented or relieved, housing authorities must provide temporary accommodation to those who meet certain criteria, such as having a priority need. This duty continues until suitable long-term housing is found.

Warwickshire County Council: While the district and borough councils lead on most housing-related services, the County Council plays a significant role, particularly in areas like care leavers and commissioning accommodation related and community based support. These services help individuals maintain their tenancies and live independently, offering both accommodation-based and floating support. The County Council also collaborates with other agencies and provides services to address the broader issues contributing to homelessness, such as health, financial inclusion, and domestic abuse.

Health services play a crucial role in addressing homelessness by providing essential medical care, support services, and collaborating with other agencies to tackle the root causes of homelessness. Homelessness is also recognised as a key determinant of an individual's health.

- **Primary and Preventive Care:** Preventive care helps reduce the incidence of illnesses that can be exacerbated by homelessness.
- **Mental Health and Substance Abuse Services:** Many individuals experiencing homelessness struggle with mental health issues and substance abuse. Health services provide counselling, psychiatric care, and addiction treatment programs to address these challenges.
- **Emergency and Acute Care:** Homeless individuals often rely on emergency departments for immediate medical needs. Health services aim to reduce the frequency of emergency visits by providing more accessible and continuous care.

The community and voluntary sector play a vital role in addressing homelessness by providing essential services, advocacy, and support to individuals and families in need. Here are some key aspects of their role:

- **Advice and advocacy:** Many of those at risk of homelessness need independent advice and support to help them to find their own solutions. A network of services provides valuable advice to those who may not approach the district and borough councils.
- **Direct Support Services:** The third sector offer a range of services, including emergency shelters, food banks, and outreach programs. These services provide immediate relief to those experiencing homelessness and help meet their basic needs. Some services are commissioned, primarily by the County Council, but there are many smaller, local services that build an impressive network of services.
- **Holistic Support:** Voluntary organisations often provide wraparound services that address the broader needs of homeless individuals, such as mental health support, addiction treatment, employment assistance, and life skills training.

Tackling homelessness in Warwickshire involves a multi-agency approach, with the district and borough councils working alongside the County Council, NHS, police, probation services, and various community and voluntary organisations. This collaborative effort aims to address the root causes of homelessness and provide comprehensive support to those affected.

To support our effective partnerships we will agree ways to regularly bring together partners to discuss and progress our approach to tackling homelessness.

1. Delivery of the Countywide Homelessness Strategy 2021

1. Homelessness and Health

Objective: Reduce health inequalities and improve the health of people at risk of homelessness, homeless, or sleeping rough

Progress:

- Partners worked seamlessly to protect the health of homeless people during the COVID pandemic
- A Street Outreach Physical Health Nursing service was co-designed and implemented
- A Street Outreach Mental Health Nursing service was developed
- Liaison between hospital discharge services and housing was strengthened with the appointment of a team of Housing Hospital Liaison Officers.
- A dual diagnosis policy was agreed
- A pilot to develop GP Drop-in Clinics was initiated in the Leamington Primary Care Network

2. Homelessness and Financial Inclusion

Objective: Ensure a wide range of services are available to support those at risk of homelessness due to financial difficulties.

Progress:

- Extensive and proactive financial inclusion services were developed locally
- Problems with debt and income levels were recognised as a direct cause of homelessness and early interventions were used to as prevention tools

3. Homelessness and Young People

Objective: Enhance and improve services that prevent homelessness among young people.

Progress:

- Reviewed and relaunched the Young Persons Homelessness Protocol
- Extensive services developed to provide positive housing choices for Care Leavers
- Two dedicated Leaving Care Homeless Prevention Advisors were appointed
- The House Project was established and extended across the County
- Housing Related Support services were commissioned and pre-tenancy training was developed by Doorway

4. Homelessness and Domestic Abuse

Objective: Prevent domestic abuse and the crisis homelessness resulting from it wherever possible.

Progress:

- A team of staff dedicated to domestic abuse support was developed across the county
- The Safe Accommodation Strategy was developed and delivered
- Dispersed accommodation has been provided across the County
- A Domestic Abuse Counselling and Therapy Service has been developed
- Widespread training on domestic abuse has been provided for housing workers

5. Homelessness and Offending

Objective: Deliver better-focused housing and support services for those at risk of homelessness when leaving prison.

Progress:

- Strategic Housing Advisors have been appointed in prisons
- Extensive training has been provided to prison and probation staff on the Duty to Refer
- A reciprocal agreement has been approved for housing offenders
- The Community Accommodation Service Tier 3 (CAS3) has been provided
- Homelessness and housing was included within the Police and Crime Plan

2. Evidence to inform our partnership priorities

Each district and borough council has its own Homelessness Strategy on how to tackle homelessness within their area. These strategies include detailed analysis of a wide range of data to provide the evidence base for local priorities. We have concentrated on tracking the evidence on the levels of homelessness over the last four years to set the Statement of Intent's themes. Greater detail is provided in appendix 1.

- Housing authorities are dealing with increased numbers of households where they have the duty to relieve homelessness because they can't stay in their current accommodation.
- The consequence of this is that there has been some increase in the use of temporary accommodation for those who are homeless. Temporary accommodation is mainly used for single people and single parents.
- The number of households helped with the prevention of homelessness duty has reduced slightly over the last four years.
- There are more people sleeping rough across the county.
- Many of those assessed by housing authorities are younger people, although there is a spread of ages.
- The main causes of homelessness are family and friends no longer willing to accommodate the household, domestic abuse, other relationship breakdowns and the end of private rented tenancies.
- There has been a very significant increase in the number of single people, with or without children, being assessed as homeless.
- The assessment of the support needs of households owed the prevention duty shows a high prevalence of issues around mental health, physical health, disability, domestic abuse and a history of offending.
- The number of migrants living in the county has increased, placing greater pressure on the housing market, especially the more affordable private rented homes.
- Households included in the Homes for Ukraine scheme represent the largest number of migrants in the county.

Feedback from stakeholders

A wide range of partner organisations have been involved in the development of the Statement of Intent. There have been many views on how partners can collaborate to have the greatest impact on tackling homelessness and improving the lives of those who experience homelessness.

3. Our Partnership Focus

Over the next five years our partnerships will focus on those areas which challenge our intention to prevent homelessness in our county. Some are a continuation of the joint efforts identified in the 2021 Strategy while the changing environment has directed us to new priorities or a change of emphasis.

Homelessness and health

Our objective is to reduce the inequalities and improve the health of people at risk of homelessness, homeless or sleeping rough

Homelessness prevention

Our objective is to reduce the number of those threatened with, or those who experience homelessness, through increased early advice and support

Homelessness and domestic abuse

Our objective is to provide support and early intervention to prevent the crisis of homelessness resulting from domestic abuse wherever possible

Homelessness and offending

Our objective is to deliver better focussed housing and other support services for those at risk of homelessness of those in the criminal justice system and when leaving prison

Housing supply to reduce homelessness

Our objective is to improve the supply of housing most needed to tackle homelessness, co-ordinating our approaches across the county

Homelessness and health

Our objective is to reduce the inequalities and improve the health of people at risk of homelessness, homeless or sleeping rough

We have retained a focus on improving the health of those who are homeless from the 2021 Strategy. There has been great progress by partners including a policy on mental health and substance misuse dual diagnosis, introducing homelessness discharge leads in hospitals, physical and mental health nursing services targeting those who are homeless and rough sleeping and a pilot GP service for those rough sleeping in Leamington Spa.

Despite these positive steps we recognise the increasing numbers of homeless households, especially those living in temporary accommodation and sleeping rough. We are committed to working in partnership to improve health outcomes but also to reduce the reliance on emergency access health services.

The Darzi report, an *“Independent Investigation of the National Health Service in England”*, September 2024 highlighted the national impact of homelessness on the health of individuals.

“People experiencing homelessness are far more likely to have asthma or other breathing problems, heart disease, or epilepsy. A study of homeless hospital inpatients found that **64% had three or more physical health co-morbidities**, while a survey of people experiencing homelessness found that **82% had a mental health diagnosis**. Poor health can precipitate homelessness and homelessness creates poor health.”

The report also pointed to the impact of homeless people having poor access to primary and community care.

“The result of poor access to primary and community care is a costly **overreliance on urgent and emergency care**: people experiencing homelessness attend A&E four times as often as the general population and are eight times as likely to need inpatient care.”

Many of those who are homeless and those sleeping rough have a history of addiction, mental health issues, or physical poor health or a combination of these issues. This underscores the need for comprehensive, integrated approaches to address the health and housing needs of homeless individuals. By combining housing solutions with accessible healthcare and supportive services, it is possible to improve health outcomes and reduce homelessness. **We will consider:**

- Following a summit to discuss health and homelessness identify shared priorities and how to maintain effective joint working.
- Continue to improve data sharing to better understand the overall needs across the county and to support effective joint services for individuals.
- Understand the barriers to accessing health services for those who are homeless and sleeping rough.
- Aim to maintain the existing hospital and community-based services focussed on the health of those sleeping rough and those at risk of homelessness.
- Explore how we can better focus existing resources on providing a primary health care service for those sleeping rough.
- Continue and expand training to raise awareness amongst all services of the needs of those who are homeless, providing a trauma informed response.

Homelessness prevention

Our objective is to reduce the number of those threatened with, or those who experience homelessness, through increased early advice and support

The number of people approaching the local councils because they are homeless or threatened with homelessness continues to increase. The main reasons for people losing their home when they approach the local councils are:

- Family or friends being no longer will or able to accommodate them.
- Domestic abuse.
- Non-violent relationship breakdown; and
- The end of a tenancy in the private rented sector.

The evidence we have collated and the feedback by partners illustrate growing numbers of people who are struggling to keep or find a suitable home. Some of these are approaching councils but many more struggle for an extended period without approaching services. Many young people are moving around temporary places to stay – sofa surfing, while we are also seeing growing numbers of those sleeping rough. The pressure on the housing supply has been exacerbated by the cost of private renting, some reduction in the private rented sector and a variety of different organisations seeking to accommodate people that they are supporting in private sector accommodation.

There are many examples of services and joint approaches that aim to work with some of those who may face homelessness. These include accommodation and support provided by St Basils, Doorway and P3, many local initiatives to improve financial inclusion, dedicated leaving Care Homeless Prevention Advisors and the House Project to support care leavers.

Partners are committed to greater preventative work with those who are at risk of becoming homeless before they reach a crisis or need to contact the local councils under the homelessness legislation. **We will consider:**

- Whether face-to face services help to prevent homelessness. This may include using information hubs and taking advice and support into the services and locations already used by those at risk.
- As part of our financial inclusion work seek to understand the impact of gambling in causing homelessness and co-ordinate a suitable response for those who may need advice and support.
- Continue to co-ordinate and publicise the range of services available that can help to prevent homelessness, building an effective network of advice and support.
- Act to raise awareness of circumstances which indicate modern slavery activity and to seek to intervene and assist victims with housing solutions
- Hold regular meetings to bring together service providers to share experiences, to identify gaps and to co-ordinate prevention services.
- Develop good practice across social housing providers to reduce the number of tenants losing their homes leading to homelessness.

Homelessness and domestic abuse

Our objective is to provide support and early intervention to prevent the crisis of homelessness resulting from domestic abuse wherever possible

Domestic abuse is a widespread issue in the UK, affecting 1 in 4 women in their lifetime. It was the second most significant cause of homelessness across Warwickshire during 2023/24, 27.6% of cases owed the homelessness relief duty. It is the third most common support need identified where the housing authority works with people to prevent homelessness.

Victims of domestic abuse often flee their homes to escape violence, leading to immediate homelessness. The "No Woman Turned Away" project by Women's Aid found that many women are forced to leave their homes without secure alternative accommodation.

Domestic abuse has severe impacts on mental and physical health, which can be compounded by homelessness. Survivors often experience trauma, depression, anxiety, and/ or physical injuries, making it harder to secure and maintain stable housing.

Economic abuse, a form of domestic abuse, can leave survivors without financial resources, making it difficult to afford housing. This economic instability is a significant barrier to escaping abusive situations and achieving long-term stability.

There is already considerable collaboration to tackle domestic abuse, partly driven by the Domestic Abuse Act 2021 that introduced a number of powers and tools that partner agencies can use to have a positive impact on victim survivors and their children. Warwickshire domestic abuse and support services offer accommodation for those fleeing domestic abuse, outreach support, drop-in services in some locations and additional security. Some housing authorities have specialist domestic abuse officers.

The partners are committed to supporting the delivery of the Warwickshire Safe Accommodation Strategy 2025 – 2028 that includes a wide range of commitments and actions.

Partners are especially keen to support the Safer Accommodation objectives pursue actions to:

- Provide services for early intervention and prevention so that victim survivors are supported at an early stage and provided with options to remain at home to prevent homelessness
- Provide accessible services that victim-survivors and professionals know how to access safe accommodation options
- Ensure that there is safe accommodation available for with appropriate support for all victim-survivors that need it
- Act together so that victim-survivors are met by effective, collaborative multi agency support
- Give support to victim-survivors that they can return home safely and/or move into alternative permanent accommodation
- Work with the housing authorities and housing providers so that they adopt policies for domestic abuse which can deliver consistent services across the county.

Homelessness and offending

Our objective is to deliver better focussed housing and other support services for those at risk of homelessness of those in the criminal justice system and when leaving prison

In Warwickshire nearly a third of those released from prison are homeless after three months. Having an offending history is one of the main reasons for support for those approaching local councils threatened with homelessness.

Homelessness significantly increases the likelihood of reoffending. The Ministry of Justice found that 79% of offenders who were homeless before custody were reconvicted within a year of release, compared to 47% of those who had stable accommodation. This highlights the critical role that secure housing plays in reducing recidivism.

Many offenders require substantial support to find and maintain housing. Access to mental health and substance abuse services is also crucial, as these issues are prevalent among the homeless offender population.

A multi-agency group has encouraged considerable progress in joint working since the countywide homelessness strategy was published in 2021. Strategic Housing Advisors operate in prisons, there is a reciprocal agreement to rehouse offenders who cannot return to the area where they have a local connection, training on the duty to refer those at risk of homelessness has been widely delivered and a new common duty to refer form has been agreed. Community Accommodation Tier 3 (CAS3) accommodation can provide valuable accommodation on release from prison for up to 84 nights.

However, the prevalence of offenders in those who are homeless, especially those rough sleeping, leads to the partners maintaining housing and support services targeted at this group as a priority.

We will consider:

- Commit to regular multi agency meetings to provide a range of housing solutions for offenders
- How to extend the supply of suitable housing for those leaving prison and CAS3 accommodation to prevent homelessness. Specialist accommodation – short term
- Explore how to deal with local connection requirements when someone is released after a long sentence.
- Agree a consistent approach to disclosing risks to accommodation providers.

Housing supply to reduce homelessness

Our objective is to improve the supply of housing most needed to tackle homelessness, co-ordinating our approaches across the county

The supply of housing in the UK has not kept pace with demand. This is particularly problematic for low-income households, who find it increasingly difficult to access affordable housing. Housing costs have risen faster than incomes. Affordability across Warwickshire varies but it is a challenge for many to access the housing market. In 2023, the average home in North Warwickshire was more than six times the average full-time worker's salary. In Stratford-on-Avon it was over ten times the average salary.

In 2023 the average private sector monthly rent for a two-bedroom home ranged from £654 in Nuneaton & Bedworth to nearly £1,000 in the Warwick district. The shrinking private rented sector and increasing rents is a key barrier for many people trying to find a home, especially single people.

The number of migrants living in Warwickshire under various resettlement schemes has been increasing. In September 2024 there were over 1,300 people housed under Homes for Ukraine, over 700 supported asylum seekers and nearly 250 people part of the Afghan resettlement schemes. Pressure on accommodation in the private sector in the County has been exacerbated partly due to the Government's full dispersal arrangements for Asylum Seekers and to meet the needs of refugees.

The district and borough councils all have housing strategies and planning policies that identify the need to increase the supply of homes, especially affordable housing. We recognise the potential benefit in sharing experiences and approaches to maximise new supply.

We are especially keen to understand the need for supported housing across Warwickshire and to explore how gaps in provision may be met by new developments and repurposing properties owned by partners. The Supported Housing (Regulatory Oversight) Act 2023 includes an obligation for local authorities to publish a 'supported housing strategy'.

As the private rented sector shrinks there are many public bodies seeking to access this housing for specific groups. For example, local councils lease properties in the private sector as temporary accommodation, the Home Office commissions homes to resettle migrants, and the Probation Service uses the private rented sector to provide homes under CAS3. We recognise the potential benefit of co-ordinating the approach of the range of agencies and providers to make best use of this limited resource.

We will:

- Collaborate and engage with the new commissioned services for Accommodation Related Support to provide sufficient housing with support to meet demand
- Work locally and countywide to introduce the licencing requirements for supported housing under the Supported Housing (Regulatory Oversight) Act.
- Share our understanding of the pressures on the supply in private rented sector to identify where partners may work together most effectively to tackle homelessness.
- Work locally and countywide to introduce the Renters Rights legislation
- Work with social landlords to co-ordinate the availability of housing for those who are homeless.

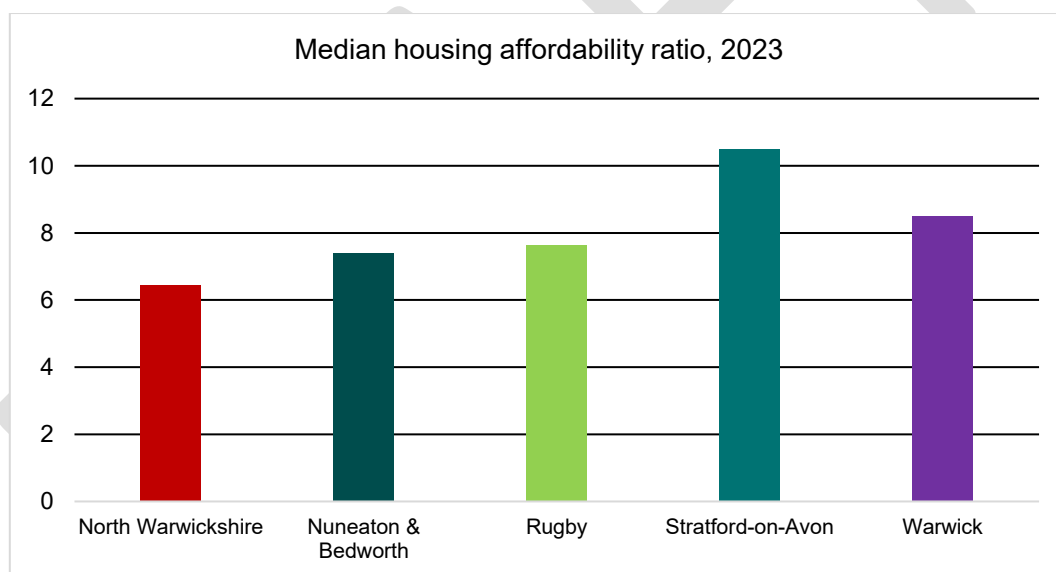
Appendix 1

Warwickshire Joint Statement of Intent to tackle homelessness

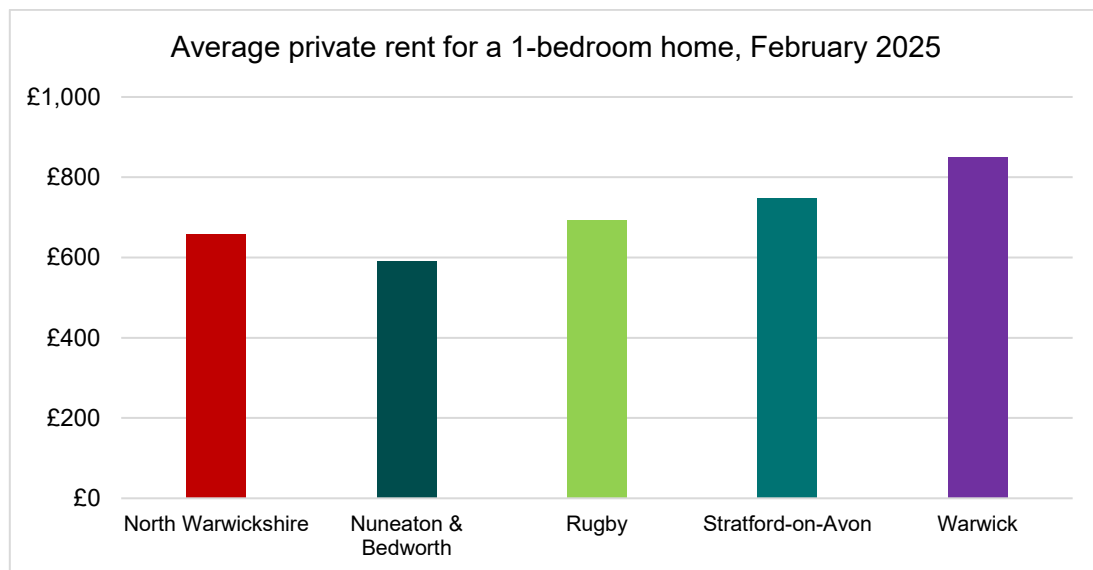
Evidence

Each district and borough council has its own homelessness strategy on how to tackle homelessness within their area. These strategies include detailed analysis of a wide range of data to provide the evidence base for local priorities. We have concentrated on drawing out the evidence to set the Statement of Intent's themes.

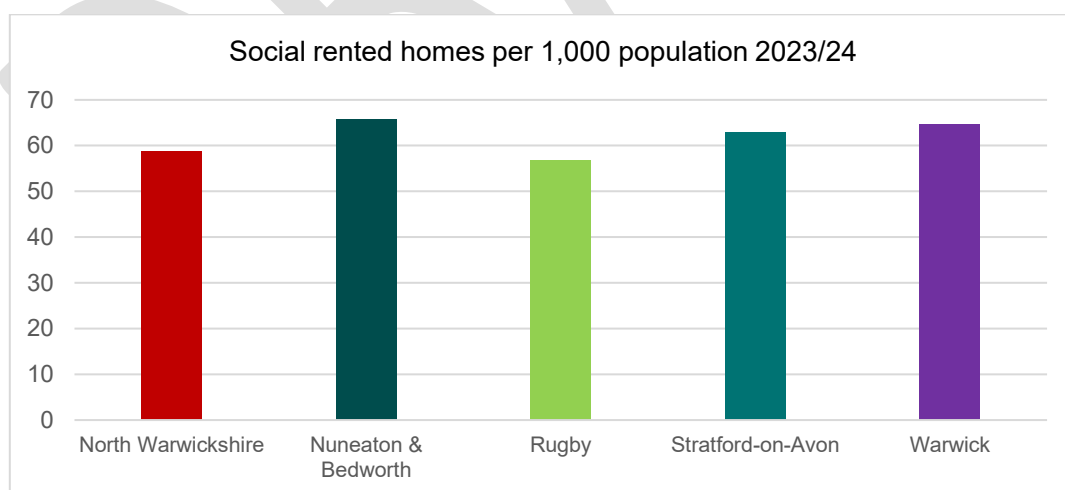
It is difficult for households on lower incomes to buy a home in Warwickshire. The ratio of the average house price to the average household income is greatest in the Stratford-on-Avon area and lowest in North Warwickshire. However, the ratio is still over 6 to 1 in North Warwickshire.



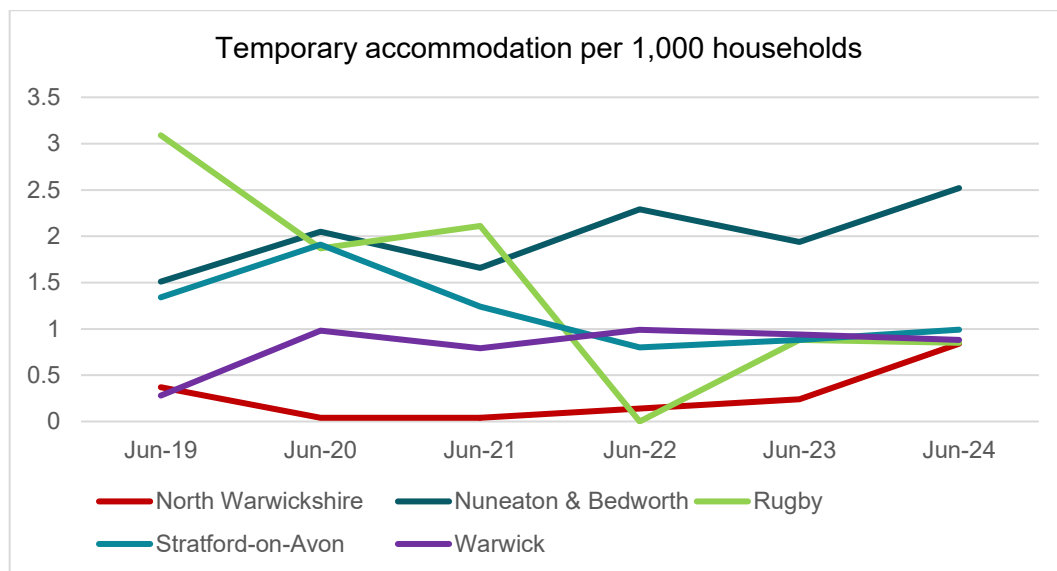
Many people on lower incomes will struggle to find a home in private rented sector because of the high rents across Warwickshire. Warwick sees the highest average rent with the lowest average rent in Nuneaton & Bedworth.



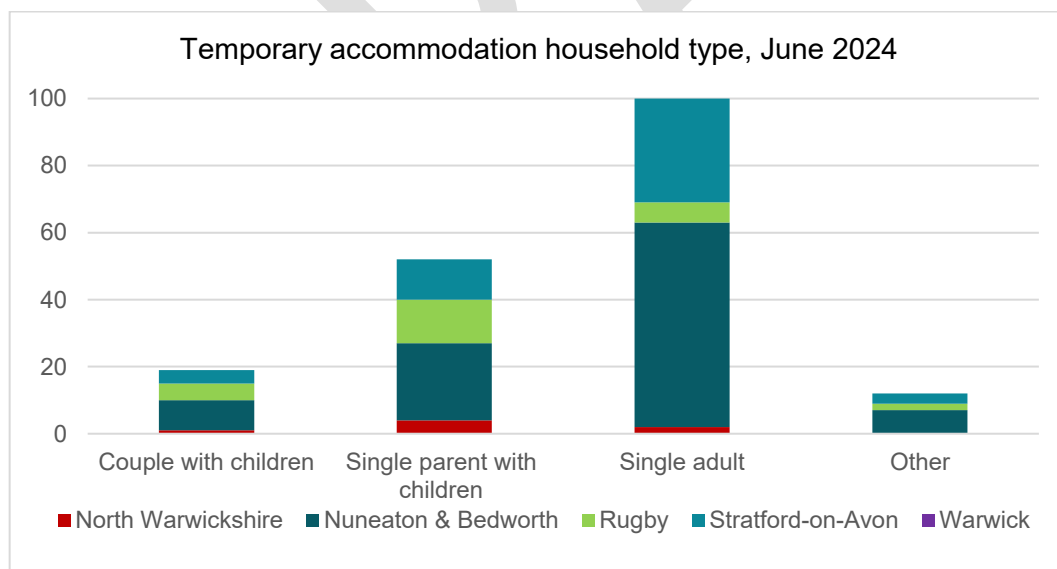
Social rented housing makes up a similar proportion of the housing stock in each of the five areas in Warwickshire. Nuneaton & Bedworth has the greatest proportion and Rugby the lowest.



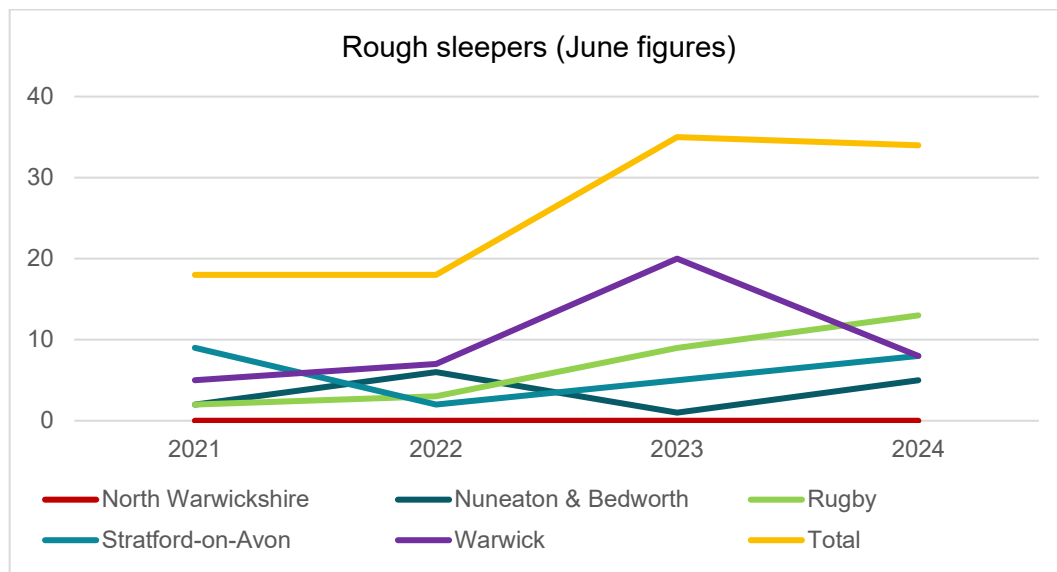
There has been some increase in the use of **temporary accommodation** for those who are homeless, This is most notable in North Warwickshire and Nuneaton & Bedworth.



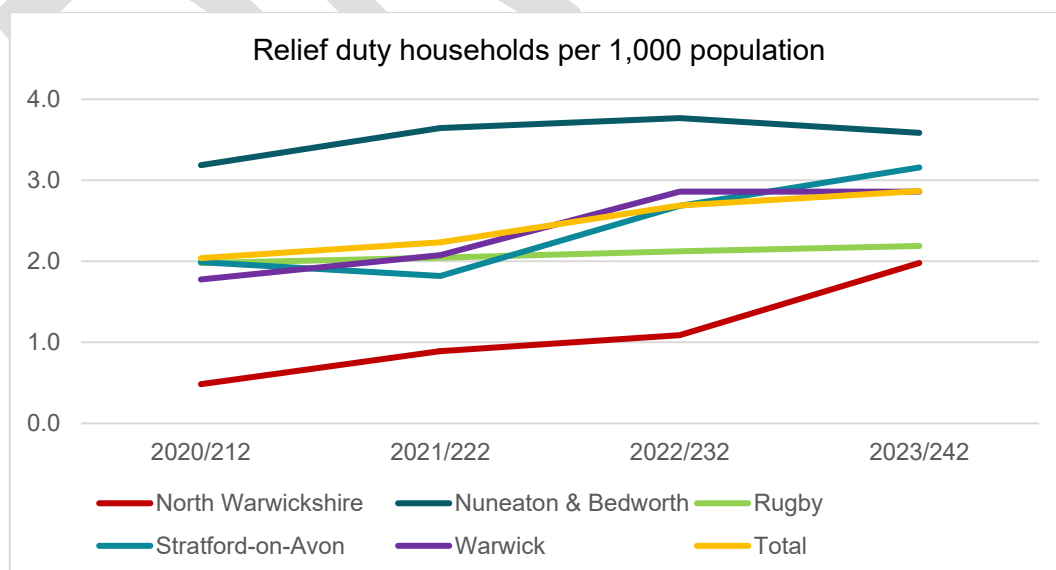
Temporary accommodation is mainly used for single people and single parents.



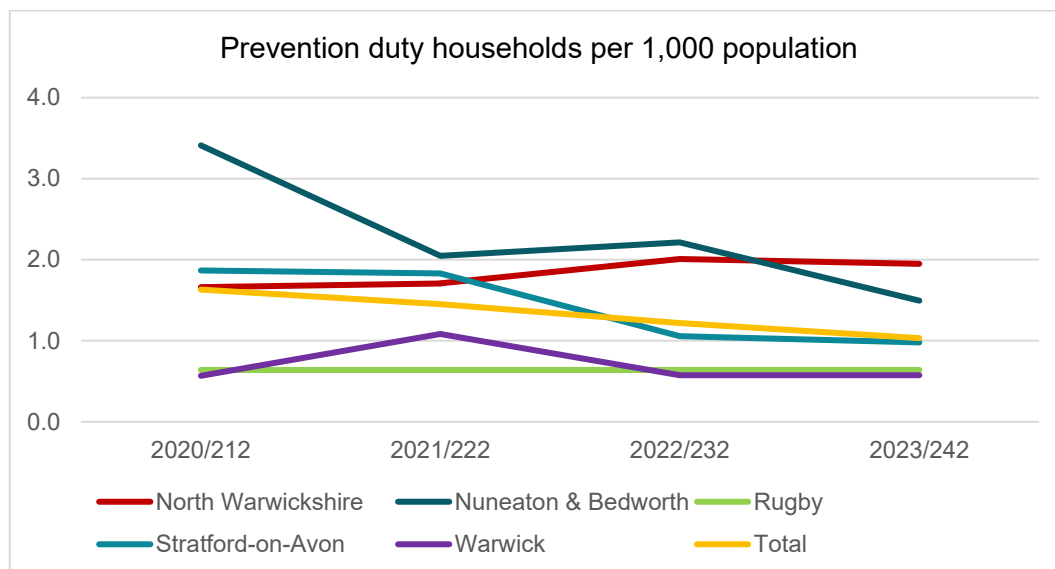
There are more people sleeping rough across the county. However, this shows significant fluctuation in most areas.



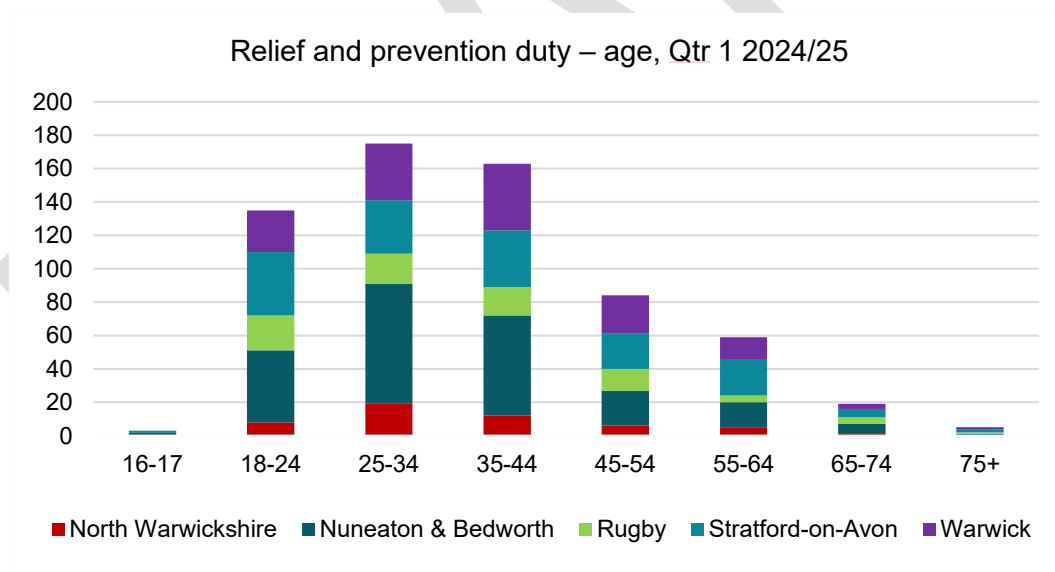
Housing authorities are dealing with increased numbers of households where they have the duty to relieve homelessness. The proportionate increases have been greatest in North Warwickshire and Stratford-on-Avon.



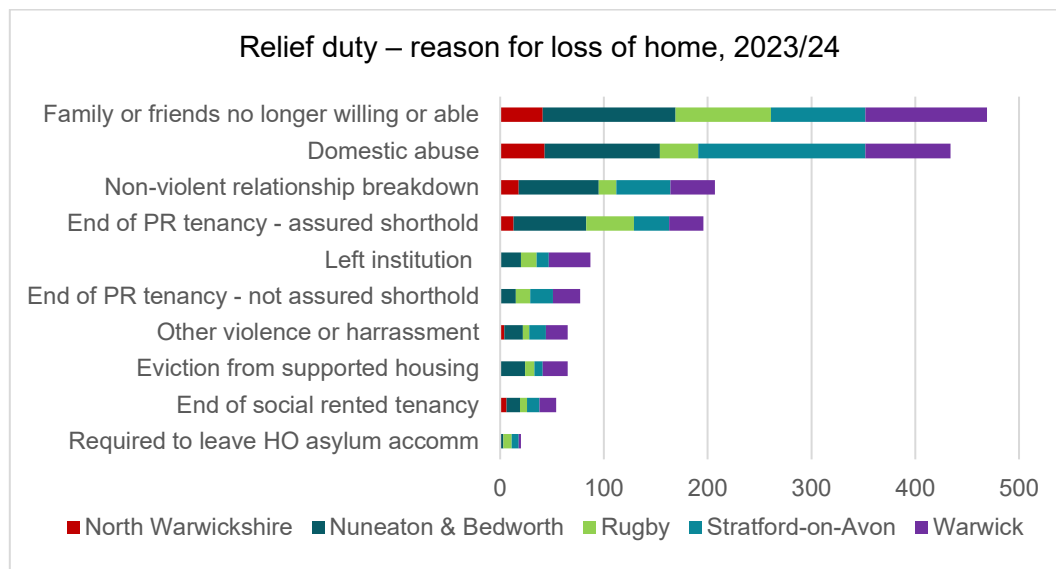
However, **the number of households supported under the prevention duty has reduced slightly over the last four years.** This may reflect the success of other services that prevent potential homelessness before households approach the councils. Nuneaton & Bedworth and Stratford-on-Avon have seen the greatest decreases.



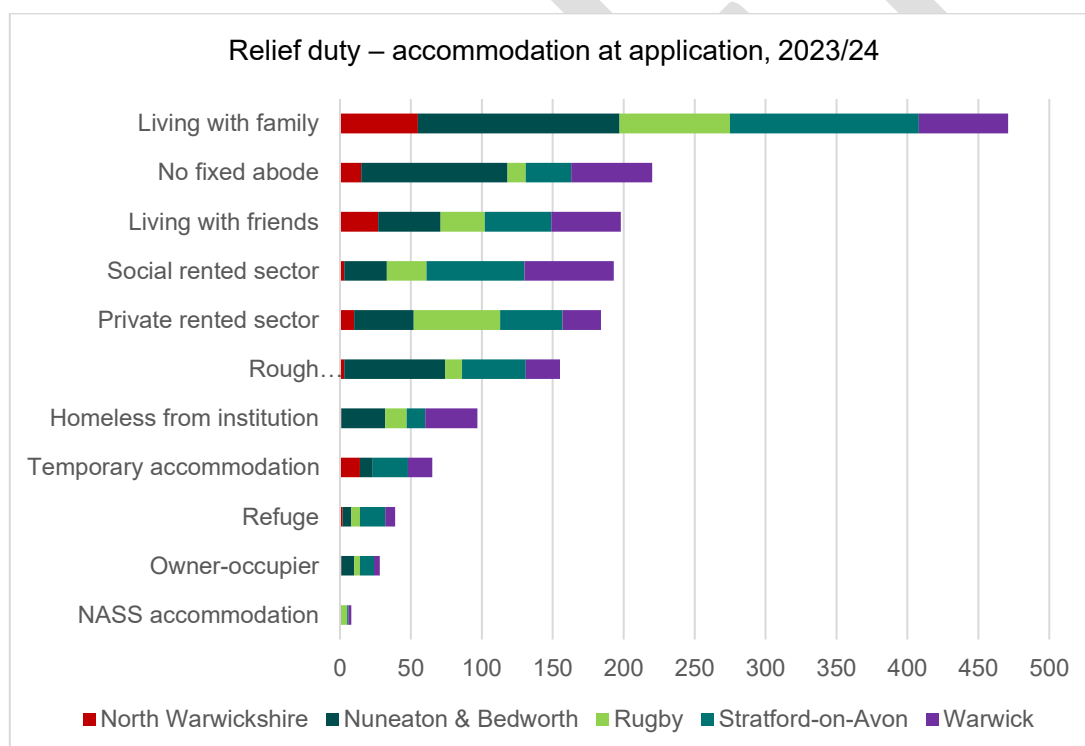
Many of those assessed by housing authorities are younger people, although there is a spread of ages.



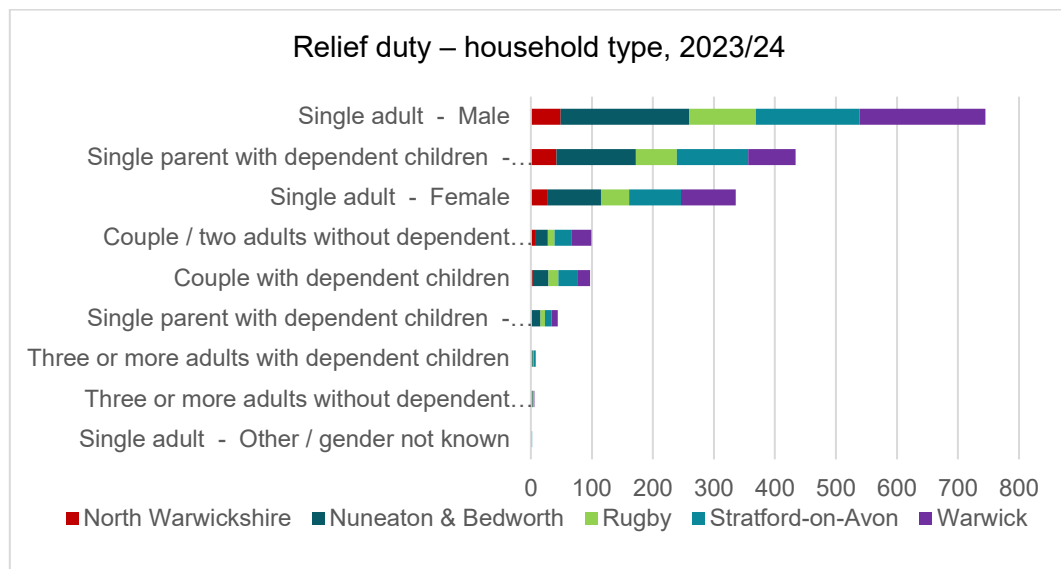
The main causes of homelessness are family and friends no longer willing to accommodate the household, domestic abuse, other relationship breakdowns and the end of private rented tenancies. Many of the family and friend cases will be younger people.



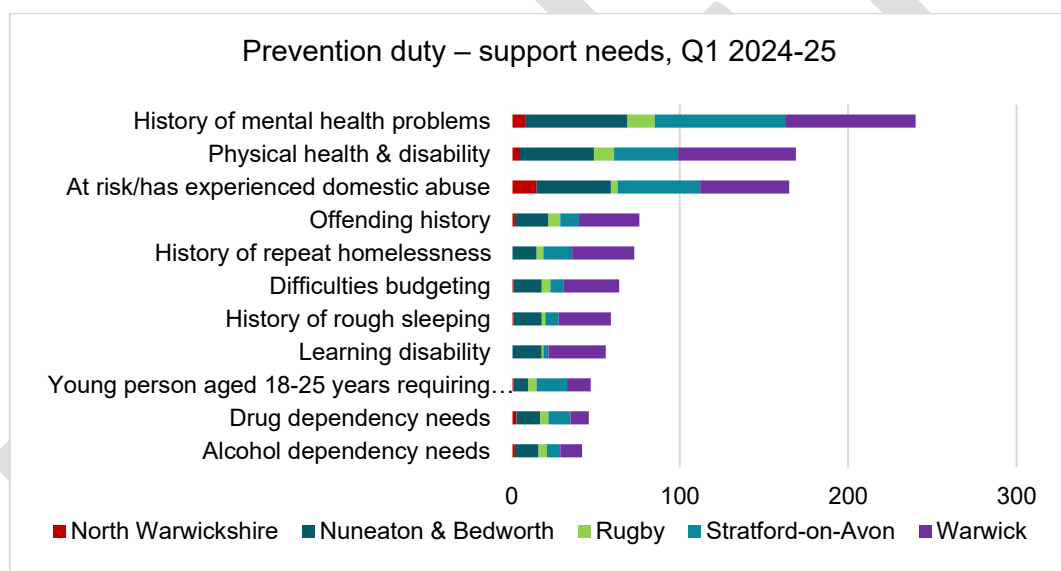
The accommodation at the time of application largely reflects the causes of homelessness with family and the private rented sector has the highest numbers. However, the numbers living in the social rented sector is also notable.



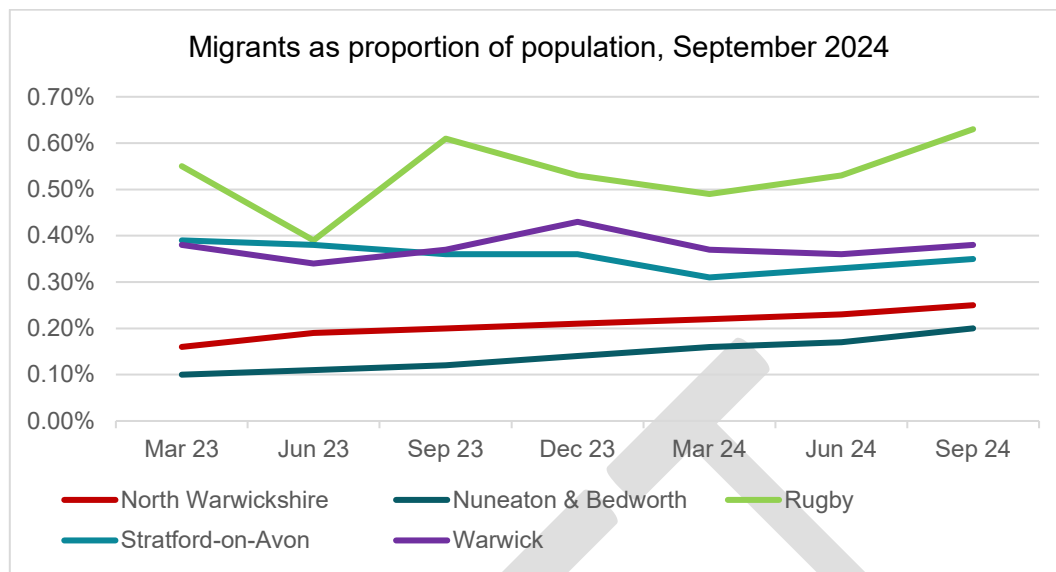
There has been a very significant increase in the number of single people, with or without children, being assessed as homeless.



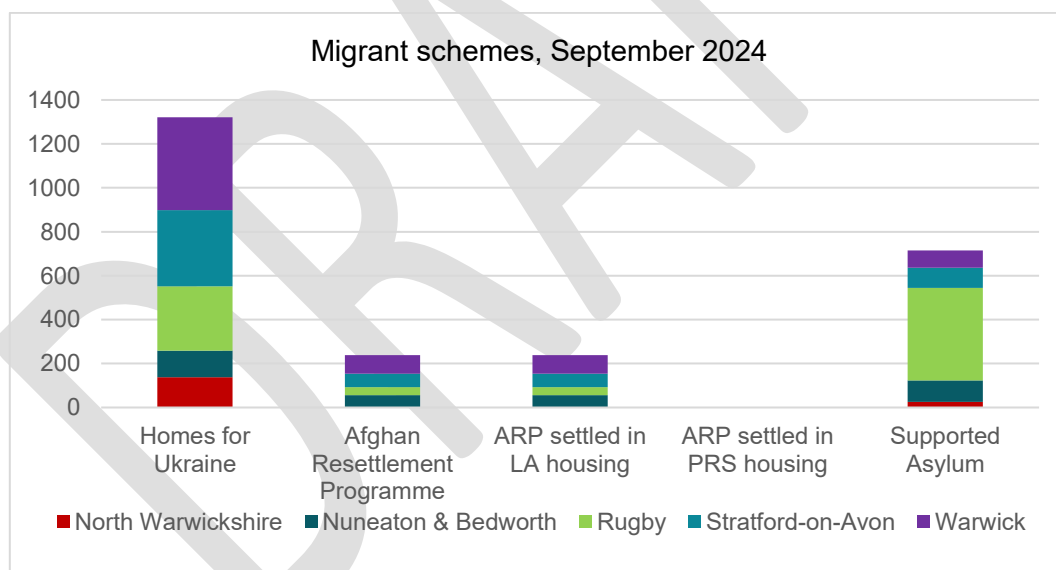
The assessment of **the support needs of households** owed the prevention duty shows a high prevalence of issues around mental health, physical health, disability, domestic abuse and a history of offending.



The number of **migrants living in the county has increased**, placing greater pressure on the housing market, especially the more affordable private rented homes.



Households included in the **Homes for Ukraine scheme** represent the largest number of migrants in the county. The number of supported asylum seekers and Afghans is also significant.



DRAFT

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:

Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	Housing Advice & Enabling
Policy/Service being assessed	Warwickshire Statement of Intent
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	New policy
EqlA Review Team – List of members	Daniel Khan, Helen Cole, Elaine Howard
Date of this assessment	12/11/2025
Signature of responsible officer (to be signed after the EqlA has been completed)	

A copy of the completed and signed Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Officer.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	To set out a collaborative approach across Warwickshire to prevent homelessness, improve health outcomes, address domestic abuse, support offenders, and ensure adequate housing supply.
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	<p>The proposed statement fits with the following Corporate Priorities:</p> <p>A Fair Rugby, as the policy seeks to reduce inequalities by preventing and relieving homelessness for those who are or at risk of becoming homeless. It aims to build good partnership working and ensure consistent approach to working on homeless reduction across the county</p> <p>A Healthier Rugby, one of the priority of the proposed policy is to prevent homelessness by intervening early before households reach crisis point. It will also continue to contribute towards A Healthier Rugby through. Planned collaboration with Warwickshire Public health on reducing health inequalities; and other existing frameworks including Housing & Hospital Liaison and coordinated multi agency support for the cohort to achieve positive health outcomes for those who are homeless or at risk of homelessness.</p>
(3) What are the expected outcomes you are hoping to achieve?	Reduced homelessness, improved access to support services, and enhanced partnership working.
(4) Does or will the policy or decision affect: <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	The policy seeks to work in partnership with key stakeholders and the other districts and boroughs across the County to build on its successes of the previous joined up country wide strategy. It supports the existing homeless strategy adopted by Rugby in March 2025 continue to provide advice, support and a range of housing options to those assessed as homeless or threatened with homelessness. The proposed policy priorities and its Action Plan will not affect any groups.
(5) Will the policy or decision involve substantial changes in resources?	There is no impact to resources but the policy and joined up working on the Housing partnership board may help inform future commissioning decisions for the council

Stage 2 – Evidence about user population and consultation

As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

(1) What does the data tell you about the groups this policy or decision impacts?

Possible data sources:

- national statistics/census data
- local statistics
- evaluations
- analysis of complaints
- user feedback
- outcomes from consultation/community voice
- Council published information, service data
- [District and Ward Profile – Warwickshire Observatory](#)
- [Office of National Statistics](#)
- [Fingertips health profiles](#)
- [Indices of Multiple Deprivation](#)
- [RBC Annual Workforce Equality Report](#)

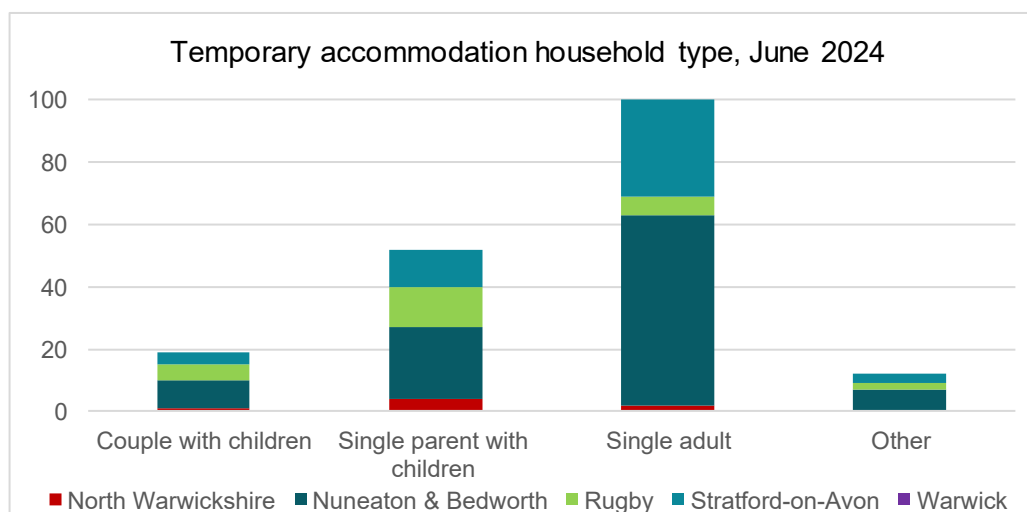
Data from homelessness trends, Warwickshire JSNA, and stakeholder engagement informs this assessment. Consultation has included input from service users, voluntary sector partners, and statutory agencies. Data from each Local Authority homeless evidence based over the last 5 years have been used to inform the proposed policy and objectives, after examining the main causes of homelessness.

Using internal and external sources mainly, the Council's case management system Jigsaw and government annual Statutory Homelessness Statistical Releases. The number of households who are statutorily homeless (assessed as homeless or threatened with homelessness within 56 days) have remained steady over the last 4 years between 311 and 349 households. Notably, this is lower than 546 households recorded in 2019/20. This is consistent with Councils across the County which experienced higher cases of homelessness during the Covid-19 pandemic.

Some key findings in the policy show homelessness disproportionately affects younger adults, people with mental health needs, and those experiencing domestic abuse.

The table and data here show how homelessness is impacted across the county:

Temporary accommodation is mainly used for single people and single parents.



<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	No
<p>(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	n/a

Stage 3 – Analysis of impact

Protected Characteristics Considered:

Protected Characteristic	Potential Impact	Mitigation/Action	Extent of Impact low / medium / high
Age	Young people and older adults may face barriers accessing housing.	Targeted support for youth and older persons; age-appropriate services.	Medium
Disability	People with physical or mental health conditions may struggle to access accommodation.	Ensure accessible housing options and mental health support.	Low
Gender Reassignment	Risk of discrimination or lack of tailored support.	Staff training and inclusive policies.	Low
Pregnancy & Maternity	Pregnant women may require urgent housing.	Priority allocation and safeguarding measures.	Low
Race	Ethnic minorities may face language or cultural barriers.	Translation services and culturally sensitive support.	Low
Religion/Belief	Potential for cultural needs not being met.	Engage faith groups and respect dietary/practice needs.	Low
Sex	Women more likely to experience domestic abuse.	Specialist domestic abuse services and safe accommodation.	Low
Sexual Orientation	LGBTQ+ individuals may face stigma.	Inclusive service design and staff awareness training.	Low

<p>(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	Detailed above		
<p>(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on</p>			

<p>social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?</p>	<p>Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition</p>	<p>Multi-agency approach to tackling homelessness in Rugby will involve referrals to support services, advice and support to develop independent living skills such as budgeting and income maximisation. Focus on increased partnership working with Warwickshire Public Health will enable address health inequalities and positive outcomes for service users.</p>	<p>Medium</p>
	<p>Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution</p>	<p>Positive As part of the proposed policy and in line with its Homelessness strategy, the Council will continue to explore and provide a range of housing options for its service users.</p>	<p>Medium</p>

<p>(3) Using the information gathered in stages 2 and 3, please describe how the policy/strategy/service will:</p> <ul style="list-style-type: none"> a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic 	<p>Over the last 5 years, 54% (1,016) of the households assessed as statutorily homeless had support needs. The majority of them had a history of mental health problems, followed by physical ill health and disability and at risk of or have experienced domestic abuse. A majority of the applicants were also single adults (61% - 933). The proposed strategy embodies partnership working and coordinated services especially for those who are most vulnerable. The outcome of the recently reviewed Allocations Policy also underpins this by allocating highest band to homeless applicants to whom the Council has a duty find a secure home. The Policy also takes into consideration sex overcrowding due to a child over the age of 10 but not yet 16 who is transitioning and is receiving specific medical treatment</p>
<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>	<p>No barriers – extra support is in place to help those with support needs make applications for housing and homeless assistance via Hope4 and the councils own housing service</p>
<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>On average 30 households approach The Housing Advice & Benefits Team for advice and/or support re homelessness every week (over thousand each year). Initial assessments are completed for everyone who approaches the service, as part of which equality data are also collected. Data on all protected groups are collected and used to determine targeting resources and in government data submissions.</p>

<p>(6) Complete this section if any adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.</p>	n/a
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<p><u>Stage 4 – Action Planning, Review and Monitoring</u></p>	
<p>(1) Data analysis What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?</p> <p>The feedback/data should be used to inform your Action Plan in (2)</p>	<p>Reliable data is crucial in understanding the level of homelessness in the borough, communities affected, identifying needs and measuring performance. Over the last 5 years, data reported via MCHLG Homelessness Case Level Information Collection (H-CLIC) included missing data. Missing data can impact on performance management, service improvement and delivering proactive and responsive that addresses needs of the service users.</p> <p>Accurate and comprehensive data is essential for understanding the scale of homelessness within the borough, the communities affected, and for identifying needs and monitoring performance. Data submitted through the MHCLG Homelessness Case Level Information Collection (H-CLIC) for all Districts and Boroughs is returned to central Government and the data is published in the public domain quarterly.</p>

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1"> <thead> <tr> <th>Action</th> <th>Lead Officer</th> <th>Date for completion</th> <th>Resource requirements</th> <th>Comments</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
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<p>(3) Review and Monitoring</p> <p>State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>	<p>The Housing Partnerships Board and Homelessness Service Managers will monitor progress against the Action Plan quarterly and review it annually to reflect legislative changes, best practice, and local needs. Annual updates will be completed in consultation with the Housing and Communities portfolio holder.</p>																													

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on 12/11/2025 and will be reviewed on 12/11/2026.