



To whom it may concern,

Re: Preferred Options Local Plan Consultation

The Woodland Trust is the UK's leading woodland conservation charity. We own over 1,000 woods throughout the UK and our head office is in Grantham. Our aims are to protect existing woodland, create new woodland, and enable people to enjoy and appreciate woodland.

We welcome the opportunity to respond to the Preferred Options Local Plan Consultation for Rugby Borough Council, which will guide the development of the town and its surrounding areas. As the UK's leading woodland conservation charity, we are committed to protecting, restoring and creating native woodland. Our priorities in relation to planning are rooted in tackling the twin crises of climate change and biodiversity loss, and supporting healthier, greener places for people.

We are encouraged by the Council's evident ambition to enhance biodiversity, increase tree cover, and support nature recovery. Below, we offer observations on key policy areas in relation to Woodland Trust priorities, alongside specific recommendations to strengthen the plan's environmental credentials.

1. Biodiversity Net Gain (Policy EN4)

What the Trust calls for:

- A minimum 20% BNG, exceeding the statutory 10%.
- At least 50 years' maintenance for created or enhanced habitats.
- Alignment with the Local Nature Recovery Strategy (LNRS).

What the Draft Plan includes:

- A statutory minimum of 10% BNG.
- Encouragement for LNRS-aligned local delivery.
- Application of the DEFRA biodiversity metric.

Trust's Comment: We commend the Council's commitment to habitat connectivity and reference to LNRS alignment. However, we strongly urge Rugby to adopt a 20% BNG threshold, consistent with the aspirations of progressive local authorities. Woodland habitats require decades to mature, and therefore a 50-year maintenance period should be explicitly required.

2. Canopy Cover (Policy EN5)

What the Trust calls for:

- 30% canopy cover target for all new developments.
- Use of UKISG (UK and Ireland Sourced and Grown) native trees from local seed zones.
- Tree-lined streets as standard.

What the Draft Plan includes:

- 20% post-development canopy cover target for major developments (excluding Rugby town centre).
- Retention of higher existing canopy levels.
- No explicit mention of tree-lined streets, but implied via green infrastructure emphasis.
- BS5837:2012 used to assess and project canopy over 25 years.

Trust's Comment: We welcome the inclusion of a 20% canopy cover requirement as a solid foundation. However, Rugby's low existing woodland cover (7.8%) calls for a more ambitious target of 30%, especially for greenfield and edge-of-settlement developments.

We also recommend:

- Explicit reference to tree-lined streets in accordance with NPPF paragraph 136.
- A requirement for UKISG trees from seed zone 403 to enhance biosecurity and local adaptation.

3. Protection of Ancient Woodland and Veteran Trees (Policy EN1)

What the Trust calls for:

- Full adherence to NPPF paragraph 193(c), with no development permitted that would cause the loss or deterioration of irreplaceable habitats except in "wholly exceptional" circumstances.

What the Draft Plan includes:

- A general commitment to protecting ancient woodland and veteran trees via national policy and the mitigation hierarchy.

Trust's Comment: We support the recognition of irreplaceable habitats but recommend that Policy EN1 explicitly references the "wholly exceptional reasons" test in NPPF 193(c). This would provide stronger protection and reduce the risk of policy dilution through cost-benefit arguments.

4. Hedgerows

Trust's Comment: While hedgerows are considered in landscape policies, we encourage the Council to develop a hedgerow-specific policy that:

- Recognises ancient hedgerows as irreplaceable features.
- Applies a 10:1 replacement ratio for non-ancient hedgerow losses.
- Requires the use of native, UKISG-compliant species in hedgerow creation and restoration.

5. Landscape Protection (Policies EN2 & EN3)

Trust's Comment: We welcome the emphasis on character and tranquillity, especially within the Ironstone Fringe Area of High Landscape Value. To enhance the ecological value of this policy, we suggest explicit recognition of:

- Habitat networks and ecological corridors.
- Integration of woodland and hedgerow connectivity into landscape assessments.

Summary of Recommendations

- BNG: Raise the target to 20%, with a 50-year maintenance requirement.
- Canopy Cover: Increase the target to 30% in new developments; assess delivery through long-term monitoring.
- Tree-lined Streets: Include an explicit policy requirement.
- Ancient Woodland and Veteran Trees: Reference NPPF 193(c) verbatim in Policy EN1.
- Hedgerows: Establish a separate policy with robust protection and replacement standards.
- Monitoring and Enforcement: Introduce clear mechanisms for ensuring delivery of canopy and biodiversity goals post-development.

We would be pleased to support the Council in developing these policies further or identifying opportunities for woodland creation within the borough.