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19 May 2025

Preferred Option Consultation
Development Strategy Team
Town Hall
Evreux Way
Rugby
CV21 2RR

Via email only: localplan@rugby.gov.uk

Dear Sir/Madam,

Representations to Rugby Borough Council's Local Plan Review - Preferred Option Consultation

We write on behalf of our client, Tarmac Trading Limited ('Tarmac'), to provide representations to Rugby Borough Council's ('RBC') Local Plan Review Preferred Option Consultation. These representations are made in relation to Land north of London Road, Ryton on Dunsmore, CV8 3ET ('the site'), as shown on the Site Location Plan included within **Appendix I**.

Supporting Information

In addition to this Letter, the representations are supported by the following documents:

- Transport Appraisal, prepared by Mode Transport Planning;
- Preliminary Ecological Appraisal, prepared by MKA Ecology;
- Designated Sites Review, prepared by MKA Ecology; and
- Baseline Biodiversity Assessment, with Statutory Biodiversity Metric Calculator, prepared by MKA Ecology.

Introduction

These representations are being made primarily in relation to draft Policy S7 'Employment allocations' of the Preferred Option Consultation Document (March 2025) to strongly object to the site not being allocated for employment use following the Stage 2 Site Options Assessment, where the site was not progressed past Stage 2.

The representations set out details of the site and surrounding context, the previous background and assessment through the Local Plan Review to date and the recent policy and legislative changes that have impacted the principle of development on the site. Within this context, the representations then demonstrate that the site should be progressed and allocated for development within the Local Plan Review as it is deliverable and developable.

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We welcome the opportunity to submit representations through the Local Plan Review process in relation to the site and request an urgent meeting with RBC to discuss this with you so that we can present our findings prior to the Regulation 19 Local Plan Review progressing any further.

Site and Surrounding Context

The site is located within the administrative boundary of RBC, adjacent to the north west of the main rural settlement of Ryton-on-Dunsmore. The site is approximately 5.5km to the south east of Coventry City Centre and 1.5km to the south east of the urban extent of Coventry. Coventry Railway Station is 5.8km to the north west of the site.

The site is bound by London Road (A45) to the south, with Prologis Park Ryton Strategic Employment Site beyond, by two-storey detached and semi-detached residential dwellings along Church Road to the east, Redland Lane and Steetly Meadows to the north, and green field land and sewage works to the west.

The site extends to approximately 23ha and comprises grazing fields bordered by hedgerows and trees, with a wooded area to the southwest. The southern boundary of the site is lined with trees and shrubs. There are two Public Right of Ways (PRoWs) that join up to Church Road to the east of the site.

The site is ideally located adjacent to London Road (A45), providing excellent connections to Coventry and the road network beyond. The Post Office bus stop is located within 200m of the site and is served by bus route 25, providing good connections between Rugby and Coventry.

The Brandon Marsh Site of Special Scientific Interest (SSSI) and Nature Reserve lies approximately 250m to the north of the site's red line boundary, beyond the River Avon. The Ryton and Brandon Gravel Pits SSSI is comprised of three distinct components one of which is located directly adjacent to the site to the west.

Beyond the Prologis Park Ryton Strategic Employment Site, currently occupied by a number of employment, logistics and distribution businesses, including DHL, Ceva Logistics and Jaguar, is the Prologis Park West and Mountpark Preferred Option Consultation site allocation (Site ID 328) allocated for circa 350,000sqm of employment floorspace on the 171.86ha site.

Reason for Removal from Rugby Borough's Preferred Option Consultation Document

These representations follow previous representations and a Call for Sites submission made by Stantec on behalf of Tarmac in relation to the site during the Rugby Borough Local Plan Issues and Options Consultation, which ran between 31st October 2023 and 2nd February 2024. A copy of the representations is included within **Appendix II**. We note that the previous red line boundary has been amended for the Preferred Option Consultation representations to reduce the size of the site and meaning there are now no SSSIs within the site boundary.

The Issues and Options representations put the site forward for Class B8 (Storage and Distribution) employment development to help meet the employment needs of RBC and provide a logical

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expansion of the existing Prologis Park Ryton to the south. The representations identified that it would be appropriate to plan for a minimum of 150.5ha.

Following this, the site was assessed within the Rugby Borough Stage 2 Site Options Assessment (March 2025) as Site 71: London Road, Ryton-on-Dunsmore. The site assessment is included within **Appendix III**. The outcome was that the site was not progressed past the Stage 2 Assessment due to the high ecological constraints due to the SSSIs within and close to the site boundary, along with Local Wildlife Sites (LWSs), and the understanding that there was potential coverage of more than 40% of the site with habitat of medium to high distinctiveness. These ecological constraints were set out within RBC's Ecological Constraints Assessment (March 2025). The full assessment evaluated a number of topics including transport, ecology, landscape, heritage and other constraints. These are explored separately and in detail below, with additional evidence to counter the findings of the Ecological Constraints Assessment.

Green Belt Assessment

A Joint Green Belt Study was prepared in June 2015 by LUC on behalf of six West Midlands councils, including RBC. The site fell within the wider Land Parcel RD4, and the site assessment is included within **Appendix IV**. The parcel's contribution to the purposes of the Green Belt is summarised below:

Green Belt Purpose	Parcel's Contribution – Score Summary
a) To check unrestricted sprawl	2/4
b) To prevent neighbouring towns from merging	4/4
c) To assist in safeguarding the countryside	1/4
d) To preserve the setting and special character of historic towns	0/4
e) To assist in urban regeneration	4/4
Total	**11/20**

We explore the score against each purpose in turn. For purpose a), the assessment scored the parcel's contribution as 2/4 as whilst it plays some role in preventing ribbon development along Redland Lane, ribbon development was not considered likely to occur along the dual carriageway. It was considered that the openness of the parcel was compromised due to existing buildings, particularly on the western part of the parcel. The parcel and site therefore do not strongly contribute to purpose a).

For purpose b), the parcel's contribution score was considered to be 4/4 as it plays a separating role in preventing the new industrial estate adjacent to Ryton-on-Dunsmore from merging with Coventry roughly 650m to the north west. Notwithstanding this, we note that this role is played by the north west part of the parcel and the site itself does not play a role in separating the industrial estate from merging with Coventry, and does therefore not strongly contribute to this purpose. The development of the site would not take development any closer to Coventry and does not play a role in preventing towns from merging.

For purpose c), the parcel's contribution score was considered to be 1/4 due to the urbanising influence of existing buildings, hardstanding and land uses (sewage works and industrial land) and the significant boundaries of London Road to the south and River Avon to the north, preventing further encroachment. The parcel and site therefore do not strongly contribute to purpose c).

For purpose d), the parcel has 0 contribution as it does not overlap with a conservation area within a historic town and there is no intervisibility between the historic core of a historic town and the parcel. Therefore, the site does not contribute to purpose d).

For purpose e), the Study sets out that all parcels make an equally significant contribution (+4) to this purpose by restricting the land available for development and encouraging developers to seek out and recycle derelict/urban sites. Notwithstanding this score, we note that this now needs to be viewed in the context of the revised NPPF, discussed further below, and the clear direction of the Government to utilise land that is not fulfilling the purposes of the Green Belt to help address unmet need which is currently not being met through recycling of derelict and other urban land. It is considered that the site cannot significantly contribute to incentivising development on derelict and other urban land when there is currently not enough derelict land to meet the needs of the Council.

Therefore, if the site's contribution to the Green Belt purposes were to be assessed, it would be confirmed that the site does not strongly contribute to any of the Green Belt purposes and the site would score less than the 11/20 given to Parcel RD4, particularly due to the site not contributing to purpose b) and the recent context altering the site's contribution to purpose e).

It should be noted that the Prologis Park West and Mountpark employment site allocation (Site ID 328) within the Preferred Option Consultation was assessed as Land Parcel RD3 within the Joint Green Belt Study and was assessed to have a stronger contribution to the Green Belt than parcel RD4, with a total score of 13/20, with 3/4 for purpose a) and 2/4 for purpose c). This is discussed further below.

The North of Ansty Park employment site allocation (Site ID 14) and the Crowner Fields Farm and Home Farm, Ansty employment site allocation (Site ID 95) within the Preferred Option Consultation were not assessed as part of the Joint Green Belt Study.

Principle of Development and Recent Changes

National Planning Policy Framework

On the 12th December 2024, a revised NPPF was published, setting out the Government's revised planning policies which include new provisions in respect to the Green Belt and industrial capacity. The key changes are set out below.

Altering Green Belt Boundaries

The revised NPPF includes clarity on what constitutes exceptional circumstances when altering Green Belt boundaries. Paragraph 145 states that boundaries should only be altered where

exceptional circumstances are fully evidenced and justified through the preparation of updating of plans. Whilst strategic policies should establish the need for any changes to boundaries, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

Paragraph 146 sets out that exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review boundaries in accordance with the NPPF and propose alterations to meet needs in full, unless there is clear evidence that doing so would fundamentally undermine the purposes of the remaining Green Belt, when considered across the area of the plan.

Paragraph 148 sets out that where it is necessary to release Green Belt land, plans should prioritise previously developed land, then consider Grey Belt which is not previously developed, then other Green Belt locations, noting the importance of promoting sustainable patterns of development.

Grey Belt

One of the main changes to the NPPF is the introduction of Grey Belt land, which is defined as:

'For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'

The Government's approach is made clear in their *Consultation Outcome: Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation* (updated 27 February 2025) which states "*our revised grey belt definition will allow for development on land that is not already previously developed … we believe it is important that we also consider the development potential of land which, though it may be formally designated as green belt, no longer adequately serves the green belt purposes".*

Paragraph 155 states that the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate development where all the following apply:

a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

b. There is a demonstrable unmet need for the type of development proposed;

c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and

d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157.

Additional guidance has been published within the NPPG, setting out how authorities should assess their Green Belt to identify Grey Belt land. It encourages authorities to produce a Green Belt assessment and provides guidance on how a judgement should be made on how land contributes towards purposes a), b) and d). Authorities should consider whether the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.

Whether locations are sustainable should be determined in light of local context and site or development-specific considerations. However, in reaching these judgements, national policy is clear that authorities should consider opportunities to maximise sustainable transport solutions.

The guidance confirms that if development is considered to be not inappropriate development on Grey Belt land, then it is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness. Paragraph 14 of the guidance states that this is consistent with rulings from the courts which have confirmed that test of impacts to openness or to Green Belt purposes are addressed and a proposal does not have to be justified by VSCs where development is not considered to be inappropriate.

Industrial Capacity

The changes to the NPPF also seeks to build a strong and competitive economy. NPPF Paragraph 86 states that policies should proactively encourage sustainable economic growth, having regard to the national industrial strategy. Policies should identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period. The wording seeks to encourage policies to pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics and seek to address potential barriers to investment. Policies should be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.

NPPF Paragraph 87 has been expanded to provide clearer guidance on the different specific locational requirements of different sectors, including making provision for storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially when this is needed to support the supply chain, transport innovation and decarbonisation. It seeks to make provision for the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.

In addition, NPPF Paragraph 127 requires policies and decisions to reflect changes in the demand for land and be informed by regular reviews of both the land allocated for development in plans, and of land availability.

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Invest 2035: The UK's Modern Industrial Strategy (Consultation Document November 2024)

The Department for Business and Trade undertook a consultation on their draft Industrial Strategy between October and November 2024 which seeks to provide a launchpad for businesses, with growth being the number one mission for the Government.

The new modern Industrial Strategy "Invest 2035" is the UK government's credible 10-year plan to deliver the certainty and stability businesses need to invest in high growth sectors. The Strategy supports eight growth driving sectors, all of which rely on the logistics sector. The Strategy is unreservedly pro-business and is due to be published imminently to provide the certainty that inspires confidence.

A final version of the Invest 2035: The UK's Modern Industrial Strategy is anticipated imminently.

Planning and Infrastructure Bill 2025

The Planning and Infrastructure Bill was introduced to the House of Commons and had its first reading on 11th March 2025. The Bill is central to the Government's plan to get Britain building again and deliver economic growth. It seeks to speed up and streamline the delivery of new homes and critical infrastructure, supporting the delivery of the Government's Plan for Change milestones of building 1.5 million homes in England and fast tracking 150 planning decisions on major economic infrastructure projects by the end of this Parliament.

Housing delivery is directly linked to increased demand for logistics space, with each new home requiring an additional 69 square feet of warehouse space to support its distribution needs (*The British Property Federation's What Warehousing Where? Report*). Therefore, an additional 25.64 million square feet of warehouse space will be required each year if the Government meets its housing targets of 371,541 new homes annually.

Importance of Changes and Promotion of Industrial Land

The context set out above offers two main points of relevance for the purpose of these representations. Firstly, it demonstrates that nationally there is a greater identified need for the delivery of industrial and logistics space to ensure the country's economic growth remains strong, whilst also being diversified across different sectors, including logistics and manufacturing. The context clearly highlights the importance of the role industrial uses play at the strategic national level to support the economy.

Secondly, the amendments to Green Belt policy seek to assist with the identification of sites that no longer serve the Green Belt purposes and that have potential for development to meet unmet need and the site has very good potential to meet unmet need and help contribute to economic growth.

This context is explored in detail below.

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Industrial Need, Capacity and Market Commentary

A Market Commentary, included within **Appendix V**, has been undertaken, establishing that demand for 'big box' industrial units is high at a national scale driven by a range of changing trends, including on-shoring and the need to increase resilience in supply chains post COVID-19, Brexit and other impacts, Automation and advances in technology changing occupier demands, and E-commerce and increasing customer demand.

The East and West Midlands are the most in-demand locations in the country for 'big box' industrial units given their strategic location, sitting in an area where 90% of the population can be reached within a four-hour drive. The attractiveness of these areas is reflected in Avison Young's Big Box Bulletin (2024) which indicates that 52% of units taken up across the country in 2024 were in the East and West Midlands.

The Coventry and Warwickshire sub region and in particular the districts of Rugby, Coventry and North Warwickshire, are the most attractive within the East and West Midlands with vacancy rates below 7% in early 2025, indicating a highly constrained market. At the same time, headline rents have increased significantly over the last ten years and now sit at between £9.50 and £10 psf for high quality big-box floorspace.

The Market Commentary details a number of notable deals that have taken place recently, along with live enquiries (745 enquiries between April 2023 and March 2025 in the midlands), to further illustrate market interest in the area. Whilst some supply is coming forward, it is considered unlikely to meet all sub-regional demand given the scale of demand at all levels. The site's location represents an economic opportunity to create an even stronger cluster of logistics activity and is ideally located to be extremely attractive to the market due to its adjacency to the strategic road network, proximity to a large labour pool, suitability to accommodate appropriately sized units, proximity to similar types of businesses and links to universities and education institutions.

The West Midlands Strategic Employment Sites Study (WMSESS) 2023/24 confirms that there was a supply at 2023 of around 1,300ha of strategic sites against an estimated need of up to 2,300ha by 2045, demonstrating a significant shortfall across the supply portfolio. The Study recommends that in the long term there will be a need for a selection of further strategic 'road' based sites that would amount to around a further substantial 850ha. The Study acknowledges that achieving the levels of supply recommended will be challenging in the context of Local Plan making, including the wide range of policy considerations, not least Green Belt. However, without a portfolio of investment opportunities, the region will continue to turn away occupiers and constrain economic growth.

The Study reiterates the findings of the Market Commentary, noting that COVID-19 saw demand increases driven by e-commerce against an already strong trajectory and vacancy rates for large units have remain sub optimally low since 2014, putting pressure on rents and land values and reducing choice for business growth and inward investment. The market evidence points to a strong need for additional investment sites to be brought forward across the region to support growth.

The Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA) (November 2022) concludes that for strategic warehousing floorspace, there is a need for 551ha of land to 2041 and 735ha to 2050, inclusive of a 5-year margin. In addition, the employment land needs for 2021-2040 for general industrial and office is 156.1ha for Coventry and 155.7ha for Rugby, which increases to 224ha and 224.7ha respectively for 2021-50.

The Coventry & Warwickshire HEDNA – WMSESS Alignment Paper (November 2024) notes that 3 areas of opportunity for strategic sites within Coventry and Warwickshire were identified within the WMSESS, including Area 7 and the A45 in Coventry & Rugby. Area 7 has an indicative land need between 2022-45 of 50-100ha of B8/mixed use and 25-50ha of B2 use. The Alignment Paper sets out that the overall gross need for strategic sites within Coventry & Warwickshire is 833-1,015ha. There is also a need for industrial units smaller than 100,000sqft and big box units on non-strategic sites, totalling a need for 467ha between 2021-41 and 636ha between 2021-50. Therefore, the total Coventry & Warwickshire industrial employment land need is equivalent to 1,325-1,507ha for 2021-41, 1,405-1,587ha for 2021-45 and 1,503-1,685ha for 2021-50.

The Alignment Paper calculates the residual strategic site need by taking off the strategic site commitments to deduce a need equivalent to the notional site recommendations totalling 200-375ha covering 2022-45. For Area 7, which includes the A45, the residual strategic need is 9-84ha. It is noted that within Area 7, the local authorities of Coventry, Warwick, Rugby and NBBC will need to work together.

It is noted that draft Policy S3 of the Preferred Option Consultation Document states that to meet RBC's need for employment land between 2024-2045, 1,026,546sqm (approx. 284ha) of floorspace for uses B2, E(g)(ii) & (iii) and B8 will be delivered, with 945,000sqm to be delivered on new site allocations within draft Policy S7.

The above clearly demonstrates a pressing need for industrial and logistics sites within the emerging Local Plan. However, a fundamental concern lies in the reliance on outdated studies and assessments that are currently shaping the LPA's understanding of need and future requirements. For example, the WMSESS was published in August 2024, the HEDNA in November 2022, and another iteration of the WMSESS in November 2024—all predating the publication of the 2024 NPPF, the forthcoming *Invest 2035* strategy, and the Planning and Infrastructure Bill. Notably, for the first time, national policy is introducing a comprehensive planning strategy aimed at advancing the UK's growth agenda. This 10-year strategy is poised to deliver significant economic benefits. It is therefore imperative that strategically important locations—such as this site—are actively promoted and safeguarded to contribute meaningfully to national growth objectives.

The UK is at a critical juncture in ensuring that sufficient employment land is made available to deliver economic opportunities nationwide. Given this site's excellent location—not only within RBC but also strategically within the Midlands—it presents a clear opportunity to support this national vision. In light of the emerging national industrial strategy and the significant potential of this site to contribute to economic growth at the local, regional, and national levels, we respectfully request that the LPA reconsiders the site's allocation within the Local Plan.

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Representations

This section reviews the findings of the Stage 2 Site Options Assessment in detail, taking each topic in turn, and demonstrates that there are no constraints to prevent the site from progressing past the Stage 2 Assessment.

It sets out why the site should be identified as an employment allocation within draft Policy S7 of the Preferred Option Consultation Document.

Ecology

The Stage 2 Site Options Assessment notes that there are high ecological constraints at the site. It sets out that, given the presence of Ryton and Brandon Gravel Pits SSSI within the site boundary (previously submitted as part of the Issues and Options Consultation), the location of Brandon Marsh SSSI immediately adjacent to the site, the location of LWSs within (River Avon and Tributaries) and adjacent (Steetley Meadows) to the site and coverage of more than 40% of the site within habitat of medium to high distinctiveness, there are considerable constraints to the development of the site. It recommends that alternative sites be identified which may be more ecologically suitable for development of this scale. The site was not progressed past the Stage 2 Assessment due to the high ecological constraints.

Since the previous representations to the Issues and Options Consultation, the site's red line boundary has been amended. This means that the Ryton and Brandon Graven Pits SSSI is no longer within the site boundary and the site boundary is further from the adjacent Brandon Marsh SSSI and LWSs.

In addition, a Preliminary Ecological Appraisal (PEA), Designated Sites Review and Baseline Biodiversity Assessment, prepared by MKA Ecology, are submitted in support of the representations. This provides a detailed a site-specific Appraisal to determine the baseline habitats and their distinctiveness on the site and goes beyond the high-level assessment within RBC's Ecological Constraints Assessment. The Baseline Biodiversity Assessment concludes that all habitats on site have a medium to low distinctiveness, with the exception of one hedgerow typology (species-rich native hedgerow – associated with bank or ditch) with high distinctiveness, which is located off Redland Lane running south through the site. Design solutions can be used to ensure that habitats with high distinctiveness can be retained, and it is not in a location required for site access.

The Ecology Assessments therefore robustly challenges the conclusions within the Stage 2 Site Options Assessment. As a more detailed, site-specific assessment, it confirms that 40% of the site is not within habitat of medium to high distinctiveness, and there are no ecological constraints preventing the site from progressing past the Stage 2 Assessment.

The Designated Sites Review identifies impact pathways for the site and highlights potential mitigation to minimise the risks of detrimental impacts to designated sites. It confirms that the River Avon and Tributaries LWS within the site boundary can be retained, protected, buffered and enhanced. The PEA confirms that whilst protected species may require some management, this

should not preclude development, and the site offers potential for creating habitat for key local species.

It is noted similar ecological constraints are present with other sites allocated within the Preferred option Consultation Document. This includes Site 328 – Prologis Park West and Mountpark, allocated for employment use within the Preferred Option Consultation document, is also assessed as having significant ecological constraints to development, and it was recommended that other alternative sites should be considered in the first instance and, where not feasible, sensitive design and site layout should avoid and ensure the protection of ecologically sensitive features associated with Ryton Wood SSSI, River Avon and Tributaries LWS, Featherstone Farm Fields potential LWS and Siskin Drive Bird Sanctuary LWS.

In addition, Site 64 – Coton Park East also has River Avon and Tributaries LWS running through the site, with the Stage 2 Assessment noting that sensitive design and layout and the adoption of appropriate mitigation measures could prevent adverse impacts.

Sites 64 and 328 were progressed as the assessment concludes that it may be that the ecological constraints can be mitigated by design, demonstrating that where there is appropriate design, mitigation and consultation, there is no reason why the ecological constraints on the site, which have been demonstrated to be lower than assigned within the Stage 2 Site Options Assessment, should prevent the site from progressing past Stage 2.

Other Constraints – Green Belt

The Stage 2 Site Options Assessment sets out that the site is entirely within the Green Belt, potentially making a strong contribution to at least one purpose. As set out above, the Joint Green Belt Study clearly demonstrates that the parcel of land assessed, within which the site formed part of, does not make a strong contribution to the Green Belt, with a total score of 11/20 for the wider Parcel (noting that this score would significantly decrease for the specific site and in the context of the recent NPPF changes).

In addition, the site can be defined as Grey Belt land with good potential for development as it no longer adequately serves the Green Belt purposes, as confirmed below.

The site is within the Green Belt where NPPF Paragraph 153 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

However, as detailed above, NPPF Paragraph 155 states that the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate development where all the following apply:

a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

b. There is a demonstrable unmet need for the type of development proposed;

c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and

d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157.

To assess if the development of the site complies with NPPF Paragraph 155 and would not be considered inappropriate, it must first be established whether the site falls within the definition of Grey Belt land. As the site is not previously developed land, it must be established whether the site strongly contributes to any of Green Belt purposes a), b), or d). As set out within the Green Belt Assessment section above, it has been established via the Joint Green Belt Study that the site's contribution to these purposes is not strong.

The definition goes on to make it clear that land cannot be 'Grey Belt' if it includes specific types of habitat sites, Sites of Special Scientific Interest (SSSI), Local Green Space, a National Landscape, a National Park, Heritage Coast, irreplaceable habitats, designated heritage assets, or is at risk of flooding or coastal change, where the application of relevant policies would provide a strong reason for refusing or restricting development. The site does not include these restrictions following the amendment of the red line plan, and whilst there are no irreplaceable habitats, appropriate design and mitigation can ensure the retention and protection of habits with distinctiveness. Therefore, the site clearly falls within the definition of Grey Belt land.

Secondly, the development must comply with the criteria set out within NPPF Paragraph 155. For part a), the development of the site would utilise Grey Belt land and, due to the size of the site, its clearly defined boundaries and the location of the urban edge, A45 and employment uses to the south and west, it would not fundamentally undermine the purpose of the remaining Green Belt across the area of the plan.

For part b), there is a clear demonstrable need, as detailed within the Industrial Need, Capacity and Market Commentary section above.

It should also be noted that need for industrial and logistics floorspace has significantly changed in recent years, particularly due to changing behaviours following the COVID-19 pandemic and the aims to build 1.5 million homes in England creating an additional requirement of 25.64 million square feet of warehouse space each year. As set out above, following the changes to the NPPF in December 2024, and the emerging Industrial Strategy - Invest 2035, there is a clear directive to ensure an overarching strategic approach for the provision of industrial and logistics space throughout the UK, resulting in a shift towards greater regional coordination and infrastructure-led planning to meet growing demand and to support economic growth. This is particularly true for sites located close to city centres with good accessibility and road connections. It is therefore considered that there is a demonstrable unmet need for this type of development in this location.

For part c), the site is located in a sustainable location, as set out within the accompanying Transport Appraisal, prepared by Mode Transport Planning, and discussed further below. It is located adjacent to the A45 and the urban edge of Ryton-on-Dunsmore, located close to a future workforce in Coventry.

For part d), the golden rules are not relevant as the proposals do not comprise major development involving the provision of housing.

Therefore, the site does not strongly contribute to the purposes of the Green Belt, falling within the definition of Grey Belt land, and the development of the site would not be inappropriate development and would accord with Paragraph 155 of the NPPF.

In addition, the site does not contribute to the Green Belt purposes as strongly as Site 328 – Prologis Park West and Mountpark, allocated for employment use within the Preferred Option Consultation document, which was assessed as having a higher contribution score, as set out within the Green Belt Assessment section above.

Therefore, the fact that the site is entirely within the Green Belt should not prevent it from progressing past the Stage 2 Assessment and the site should be allocated for employment use within the Preferred Option Consultation document.

Highways

The Stage 2 Site Options Assessment notes that the overall accessibility of the site is ranked 40 out of the 125 sites considered as part of RBC's assessment. An assessment was undertaken to determine congestion levels and the roads surrounding the site were assigned a congestion ration of category 6, with 1 being the most congested and 6 being the less congested. The conclusion notes that the surrounding road network is relatively uncongested, and the site has moderate accessibility. The site is proximate to a future workforce in Coventry.

A Transport Appraisal, prepared by Mode Transport Planning, is submitted in support of the representations to demonstrate that, from a highways perspective, the site is suitable for allocation and there are no transport constraints preventing the site from progressing past the Stage 2 Assessment.

The Transport Appraisal concludes that the site is a suitable location for employment use, benefiting from good access to the Strategic Road Network (SRN), established employment clusters and sustainable travel connections. The Appraisal proposed that site access is provided via a new roundabout on the A45, designed to accommodate forecasted traffic with appropriate measures to improve highway safety.

Pedestrian access can be enhanced through new footways with connections to existing PRoWs, and further improvements to sustainable transport access, such as improvements to existing bus services or provision of a shuttle, will be investigated. Car, cycle, HGV and electric vehicle charging parking spaces will be provided in line with the relevant adopted parking standards and delivery and servicing arrangements will be provided in line with relevant guidance.

The Appraisal also demonstrates that the sites accessibility is comparable to Site 328 – Prologis Park West and Mountpark, allocated for employment use within the Preferred Option Consultation document. Therefore, it has been demonstrated that there are no transport constraints preventing the site from progressing past the Stage 2 Assessment.

It should be noted that Site 95 – Crowner Fields Farm and Home Farm, Ansty, and Site 17 – South West Rugby, allocated for employment use within the Preferred Option Consultation document, were assessed as having more congested surrounding road networks, both with a congestion rating of category 2, with 1 being the most congested, with Site 17 having a Public Transport Accessibility Level (PTAL) of 0 (poor public transport connections).

Landscape

The Stage 2 Site Options Assessment confirms that the overall landscape sensitivity of the site is Medium/Low. It confirms that views are largely obscured from surrounding roads and the surrounding trees create a strong sense of enclosure, with noise from traffic along the A45 acting as an aural detractor. It is noted that the site is located at the urban edge of Ryton-on-Dunsmore and adjacent to warehousing developments along the A45 which are particularly visible from PRoWs within the site.

Therefore, the assessment is clear that due to the site's enclosure and location adjacent to the A45, urban edge and warehouse developments there are no landscape constraints that would prevent the site from progressing past the Stage 2 Assessment.

Heritage

The Stage 2 Site Options Assessment confirms that there are no designated heritage assets identified within 50m of the site and there are therefore no heritage constraints to prevent the site from progressing.

Other Constraints – Drainage

The Stage 2 Site Options Assessment sets out that the constraints for foul water drainage are assessed as Medium and constraints for surface water drainage are assessed as Low.

As confirmed by the assessment, the constraints are low for surface water drainage. The majority of the site is within Flood Zone 1 with a low probability (less than 0.1% annual chance) of river or sea flooding. Whilst there are minor areas with a 3.3% chance of surface water flooding each year and areas of Flood Zone 2 and 3 along the norther boundary of the site, this can be appropriately mitigated through the location of development and drainage strategies.

A strategy for foul water drainage can be prepared, in consultation with the relevant body, prior to the development of the site to ensure that there are no constraints to development. We note that Site 328 – Land West of Prologis Park, Site 95 – Crowner Fields Farm and Home Farm, Ansty, Site 14 – North of Ansty Park, and Site 17 – South West Rugby, allocated for employment use within the Preferred Option Consultation, were assessed as having High constraint for foul water drainage and that this did not prevent them from progressing, with Site 95 having significant areas of Flood Zone 2 and 3 along the western and eastern boundaries and Site 14 having Flood Zone 3 along its western edge. There are, therefore, no drainage constraints to prevent the site from progressing past the Stage 2 Assessment.

AVISON YOUNG

Opportunities/Benefits

The Stage 2 Site Options Assessment confirms that the opportunities and benefits comprise employment (B2 and B8). The allocation of the site for employment development will enable the delivery of a number of significant economic, social and environmental benefits in a location ideally suited due to the existing road network and connections to Coventry and surrounding urban areas. Employment development would create new, high-quality floorspace to cater to modern businesses, facilitating the creation of jobs and investment into the local area.

As set out above, the allocation and development of the site will clearly meet an unmet need within a sustainable location and will support the aspirations of the NPPF Paragraphs 86 and 87 by identifying the site for local and inward investment to match the strategy and to meet anticipated needs over the plan period. It will facilitate development to meet the needs of a modern economy and make provision for storage and distribution operations in an accessible location to allow for the efficient and reliable handling of goods.

The allocation and development of the site will also support the strategy set out within the Invest 2035 Consultation Document by providing certainty and stability required for investment and growth, and the Planning and Infrastructure Bill 2025 through the delivery of economic growth and the provision of warehouse and distribution space required to support the milestone for 1.5 million homes.

Altering Green Belt Boundaries

Paragraph 145 of the NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. The addition of Paragraph 146 provides additional clarity that exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for commercial or other development through other means. As set out above, there is a clear unmet need for employment development to justify exceptional circumstances, and Green Belt release is required to meet local employment needs over the plan period.

NPPF Paragraph 148 sets out that where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider Grey Belt which is not previously developed, and then other Green Belt locations. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate.

Whilst none of the five sites allocated for employment within the Preferred Option Consultation document are previously developed land, three fall entirely within the Green Belt, including Site 328 – Prologis Park West and Mountpark, Site 14 – North of Ansty Park and Site 95 – Crowner Fields Farm and Home Farm. Priority should therefore be given to Grey Belt sites over other Green Belt locations. As clearly demonstrated, the site falls within Grey Belt land and has a lesser contribution to the Green Belt purposes compared to Site 328. Whilst Sites 14 and 95 were not assessed as part of the Joint Green Belt Study, it is considered that both sites have less significant boundaries and would therefore contribute more strongly to Green Belt purposes a) and b) when compared to the

site. Priority should therefore be given to the site ahead of these sites allocated within the Preferred Option Consultation document.

It is also considered that the site is a more appropriate, sustainable location when compared to other employment sites progressed past the Stage 2 Assessment. In particular, it has been demonstrated above that the site has a surrounding road network that is less congested than Site 95 and Site 17 – South West Rugby, and is better connected to public transport than Site 17, with Site 328 being comparable for both. Sites 328, 95, 14 and 17 are also more constrained with regards to foul water drainage, with Sites 95 and 14 having higher levels of flood risk within their boundaries. Heritage and Landscape constraints are similar across all of the sites. For ecology, it has been demonstrated that the site is comparable to Sites 328 and 64 – Coton Park East, where appropriate design, mitigation and consultation can ensure that ecology is not adversely impacted.

Therefore, it is considered that the site should be given priority ahead of other sites that have been progressed past the Stage 2 Assessment, in accordance with Paragraph 148 of the NPPF.

Summary

These representations to the Preferred Option Consultation Document strongly object to the site not being allocated for employment use following the Stage 2 Site Options Assessment, where the site was not progressed past Stage 2. As demonstrated above, there are no constraints to prevent the site from progressing past the Stage 2 Assessment and the site should be taken forward as an employment process through the Local Plan Review.

The site clearly falls within the definition of Grey Belt land and, in accordance with NPPF Paragraph 148, should be prioritised over other Green Belt locations and other sites that perform worse within the Stage 2 Assessment but retained within the preferred Options.

The evidence base and assessments that have been prepared to inform the Local Plan Review are now considerably outdated following the recent changes, including the preparation of a national Industrial Strategy, and there is a clear requirement for additional industrial floorspace, particularly within the midlands core area. RBC is therefore missing a key opportunity to enhance its economic offering and drive investment, and the site should be reviewed and progressed as an allocation through the Local Plan process.

Whilst we do not dispute the sites that have been taken forward, the change to the red line boundary of the site has removed the ecological constraint and the only reason for the site not being progressed past Stage 2. There is therefore a clear requirement and opportunity for the site to be reconsidered as part of this process.

Based on the matters outlined in these Representations, it is evident that the site offers a strong opportunity to meet industrial and logistics needs—not only within the borough, but also across the region and at a national level. The previous reasons for exclusion can now be readily addressed and this has been demonstrated in the relevant sections above. Further, in light of recent shifts in national policy following the election of the Labour Government, there is a demonstrable need to allocate suitable land for industrial and logistics. Labour's commitment to rapidly advancing and

prioritising the national industrial strategy provides a strong foundation for the promotion and allocation of high-quality development sites. Given its highly sustainable location and its potential to contribute meaningfully to the objectives of the forthcoming industrial strategy, this site should be unequivocally allocated for industrial use.

We welcome the opportunity to submit representations through the Local Plan Review process in relation to the site and request an urgent meeting with RBC this month to discuss this with you so that we can present our findings prior to the Regulation 19 Local Plan Review progressing any further. Additional information can be prepared, including details on site capacity, site layout (and how design can further mitigate constraints), and how the site can be delivered to help RBC achieve its economic and employment objectives.

As RBC is under Labour administration and the Government have demonstrated a clear desire to drive economic development, we would also welcome the opportunity to discuss the site with Cllr Michael Moran, ward Councillors and Nicola Smith, Chief Officer for Growth and Investment.

We would appreciate it if you could provide confirmation that these representations have been received. Please let us know if you have any questions.

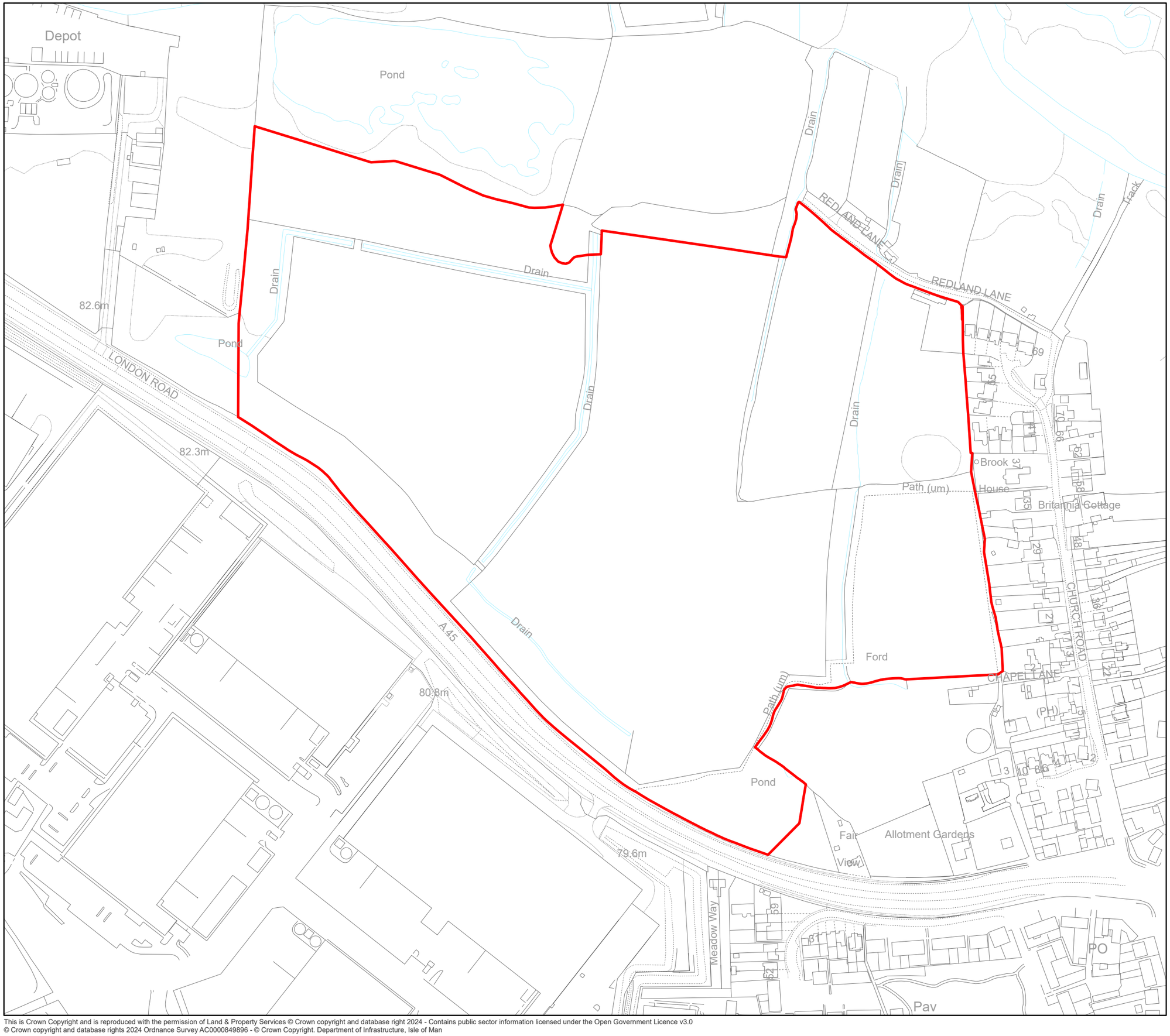
Yours faithfully

[redacted]

AVISON YOUNG

Appendix I

Site Location Plan



Legend

The Land (57.22 Ac / 23.16 Ha)

TARMAC
A CRH COMPANY

Site Name:
B344 Brandon

Drawing Name:
Brandon Site Plan

[redacted]awn By:	Scale @ A3:
[redacted]	1:3,000
Date:	**Drawing No:**
14/05/2025	B344-00049-1

N

Appendix II

Issues and Options Representations and Call for Sites Submission

Our Ref: 333100726/A3/TC/GJ

Date: 2nd February 2024

Development Strategy
Rugby Borough Council
Town Hall
Evreux Way Rugby
CV21 2RR

BY EMAIL: localplan@rugby.gov.uk

Dear Sir/Madam,

Rugby Borough Local Plan Issues and Option Consultation

We write on behalf of Tarmac Trading Limited ("Tarmac") in respect of their land interests at the Tarmac Site, Ryton-on-Dunsmore ("the Site" shown on the Location Plan at **Appendix A**. Please note that the Location Plan has been provided at a scale of 1:5,000 rather than 1:1,250 given the size of the Site). in connection with Rugby Borough Council's public consultation on the Issues and Options Local Plan Review.

The Site is considered to be a suitable location for B8 employment development, assisting in meeting the employment needs of Rugby Borough, as well as any unmet employment need arising from Coventry. The Site offers a logical expansion of the established Prologis Park Ryton, which is situated across the A45 from the Site to the southwest.

These representations are accompanied by a Call for Sites submission, which contains further information about the Site, confirming its suitability, availability and deliverability to provide sustainable employment development to address the employment needs of both Rugby Borough and any unmet need arising from Coventry.

We provide detailed responses below in respect of the questions we feel are relevant in the Issues and Options consultation document.

Land for Employment Uses

1. How much employment land should we be planning for?

Paragraph 11 of the National Planning Policy Framework (NPPF), which was published in December 2023, highlights that plans and decisions should apply a presumption in favour of sustainable development. Paragraph 11b notes that for plan-making, "*strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas*". Paragraph 20a confirms that the delivery of employment development comprises a strategic policy.

Section 6 of the NPPF regards building a strong, competitive economy. Paragraph 86b illustrates that planning policies should set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period. Similarly, paragraph 86d highlights that policies should be flexible enough to accommodate needs not anticipated in the plan.

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B8 Employment Use

Regarding the need for strategic warehousing floorspace (defined as over 9,000 sqm floorspace) within the Coventry and Warwickshire area, the Issues and Options document outlines a requirement for 551Ha of land until 2041, and 735ha until 2050, as stated in Paragraph 3.3. This is in line with the recommendations of the Coventry and Warwickshire Housing and Economic Development Needs Assessment, November 2022 (HEDNA).

Rugby Borough will be expected to accommodate a proportion of the 551ha of strategic B8 land required over the period to 2041 (or 735ha to 2050). The HEDNA does not make recommendations for strategic B8 floorspace distribution between the Coventry and Warwickshire Authorities as it does with office and industrial floor space, as such, there is no guidance as to how this requirement should be split between the Authorities.

Paragraph 31 of the NPPF notes that "*The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals*."

The HEDNA identities that strategic B8 floorspace could be provided through either new build or the replacement of existing floorspace. Table 10.9 models two scenarios for replacement provision based on a high replacement rate model and a low replacement rate model. Both of these models use the same figure for floor space required to accommodate the growth in tonnage - 125,000sqm, increasing 196,000sqm to account for forecast changes in traffic. Paragraph 10.28 of the HEDNA notes that the uplift has been converted into a need for additional floor space using "*generally accepted 'conversion factors*". The HEDNA does not specify what these conversion factors are, as such we are unable to comment on the robustness of this approach and further clarification on how this has been calculated is sought.

It is understood that the Warwickshire Authorities are awaiting the outcome of the West Midlands Strategic Employment Sites Study prior to considering how the floorspace requirement for strategic B8 warehouse use will be split between the Authorities. However, it is noted that Paragraph 11.7 of the HEDNA makes it clear that there is a very strong demand for warehousing in Rugby, as well as in North Warwickshire. Demand within the remaining Districts and Boroughs is lower. Furthermore, Paragraph 3.31 of the Issues and Options document identifies a growing need for B8 floorspace within Rugby Borough. As such, it is considered that Rugby Borough should be looking to accommodate a **significant proportion** of the 551ha of strategic B8 floorspace within its boundary.

Other Employment Uses

The Issues and Options consultation document identifies a requirement for 150.5ha of employment land, excluding offices and strategic B8 warehousing, within Rugby Borough to 2041 (or a requirement for 218.2ha to 2050). This figure includes light industrial (E(g)(iii) use), Industrial (B2 use) and local warehousing of less than 9,000 sqm (B8 use). This is consistent with the conclusions of the HEDNA for Rugby Borough.

The HEDNA calculation for industrial land has been informed by three models: The Labour Demand Model projects a decline in the need for industrial land; the Valuation Office Agency (VOA) model projects a significant increase in industrial floor space demand; the Local Authority Completions model predicts a more significant increase in the demand for industrial land.

Whilst two of the three models predict a significant increase industrial land demands in Rugby Borough, the exact amount of land needed differs between the two models. The HEDNA considers the Completions model to be the most robust for considering industrial floorspace needs. This is because the VOA model cannot differentiate between strategic and local warehousing need.

The HEDNA considers that the Completions model provides the most robust assessment of future industrial floorspace demand, particularly in the short/medium term. However, it also acknowledges a number of limitations with this approach such as the potential for delays in completions. The Completions model suggests a need for 150.5ha of industrial / local warehousing land within Rugby Borough to 2041, and this is the figure which has been taken forward in the Issues and Options Local Plan. This approach is supported. However, it is important to note the limitations of this approach and this figure should be viewed as a **minimum requirement** for Rugby Borough.

We have no comments to make in respect of Office floorspace requirements.

Coventry City

Paragraph 26 of the NPPF stresses the importance of '*joint working between strategic policy-making authorities… In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere*.'

In addition to meeting its own employment needs, Rugby Borough will likely be required to assist Coventry City in meeting its employment requirements. Coventry City Council are currently progressing their Local Plan Review, with a call for Sites having closed in late January 2024, and a Preferred Options consultation anticipated in Spring / Summer 2024.

Coventry City's current Local Plan (adopted in December 2017) identified that the City was unable to meet its own employment needs for the Plan Period 2021-2031 in the supporting text to Table 3.1. A shortfall of 241ha was identified. It is therefore considered unlikely that the City Council will be able to meet its own employment needs for the Plan Period to 2041 (which is identified as the Plan Period for Coventry's Local Plan Review). It is therefore considered that Rugby Borough should provide an uplift in employment floorspace to assist in accommodating any unmet employment land arising from neighbouring Coventry. The exact figure to be provided within Rugby Borough will become clear as the Coventry Local Plan Review progresses. It is noted that the timetable for the Coventry City Local Plan Review is running ahead of that for Rugby, as such any unmet employment need from Coventry is likely to be established prior to the next consultation on the Rugby Plan.

The 4th bullet point of HEDNA Paragraph 9.40 acknowledges that there are "*constraints on industrial land supply in Coventry"* and that major employment locations around Coventry such as Prologis Park, fall within Rugby Borough.

The HEDNA figure of 150.5ha industrial and local warehouse requirement for Rugby Borough includes an allowance for contributing towards Coventry City's unmet employment need. Whilst (as discussed above) it is very likely that Rugby Borough will need to contribute towards Coventry's employment needs, the exact figure for this is yet to be established and the figure used in the HEDNA is unclear.

Summary

The HEDNA identifies a requirement for 551ha strategic B8 land during the period to 2041 across Coventry and Warwickshire and an industrial / local warehousing requirement of 150.5ha (including unmet need from Coventry) in Rugby Borough during the period to 2041. These figures have been taken forward by the Issues and Options consultation document and this approach is broadly supported.

In terms of strategic B8 employment, it is clear from the evidence detailed above that there is a significant need for land within Rugby Borough. Whilst the distribution of this land across Warwickshire is yet to be determined, we conclude that Rugby Borough should be accommodating a **significant proportion** of this.

In terms of E(g)(iii), B2 and local B8 uses, a minimum of 150.5ha should be planned for.

We have no comments on the amount of B1 office floorspace to be planned for.

It is currently unclear how much of Coventry's employment land requirements that Rugby Borough will need to contribute towards. Any employment land figures set in the Local Plan must also take account of this.

In light of the above, we are unable to suggest a quantum of employment floorspace that should be provided through the Rugby Borough Plan to 2041. Further evidence is required through the West Midlands Strategic Employment Sites Study and the Coventry City Local Plan Review to enable us to comment further on this.

Any figures for employment need identified in the Local Plan to 2041 must be stated as a *minimum* figure. It is considered that flexibility should be built into the drafting of any policy to allow the expansion of existing employment sites where a local need is identified. This will ensure that the Plan meets the requirements of Paragraph 86d of the NPPF in being flexible enough to accommodate needs not anticipated in the Plan.

2. What type of employment land should we be planning for?

The HEDNA is clear that there is a need for all types of employment land within Rugby Borough. However, it is evident that there is a greater demand for B8 use than E(g)(iii) and B2 uses. Whilst the Borough should be planning to accommodate these other employment uses over the Plan Period in order to support the industrial / manufacturing sector, there is a clear need to allocate sufficient land for B8 uses.

The adopted Local Plan does not differentiate between strategic and local warehousing provision. It is considered important to provide specifically for local B8 floorspace to support smaller or growing businesses. Given the limited lifespan of B8 units and advancing technology, not including provision for new local B8 floorspace will mean that occupiers looking to move to new premises will be forced to look elsewhere outside the Borough.

3. Please provide any comments you have on the suitability of any of the broad locations listed above (or another location we have missed).

The land surrounding Prologis Park Ryton is identified as one of the potential 'broad locations' for employment growth in the Issues and Options document. It is a highly sustainable and suitable location for further employment development. It is an excellent location given its proximity to the A45, A46, A5 and the M6 and M69 motorways, connecting the Region with the rest of the Country. This is supported by Paragraph 11.24 of the HEDNA which identifies both the M45/A45 Corridor and specifically land around Prologis Park as a potential location to accommodate additional B8 floorspace. Whilst we fully support the 'Prologis Park broad location' as an area for employment growth, it is essential to consider land within this area beyond Prologis' landholdings to ensure that the development potential of land within the 'broad location' is maximised.

It is also considered that land within the 'Prologis Park broad location' is a logical location for contributing towards any unmet employment needs of Coventry due to its proximity to the City. Coventry City's current Local Plan acknowledges in the subtext to Table 3.1 that the City cannot meet its full employment land requirement within its own boundaries for the Plan Period to 2031. The Plan also recognises that the Prologis Park Ryton is considered to form part of the City's employment land supply. Hence, it is suggested that Rugby Borough should allocate additional employment floorspace at this broad location to help meet any unmet employment needs arising from neighbouring Coventry City.

The Tarmac Site Brandon is located across the A45 from the existing Prologis Park site. It therefore offers a natural expansion space for the existing employment facilities within the 'broad location'. The Site has excellent links with Coventry and its labour supply through both the strategic road network and public

transport options. It is therefore a suitable location not only for meeting the employment demands of Rugby, but also that of neighbouring Coventry.

We consider the suitability of the Prologis Park broad location, as well as the Tarmac Site specifically, against the HEDNA locational criteria below:

Road Accessibility – sites should be located where they can be accessed from the strategic road network

'Prologis Park broad location' and the Tarmac Site are located on the strategic highway network. The Tarmac Site is located on the A45 with links to A road infrastructure (A46 and A5) and motorway infrastructure (M6, M45 and M69), connecting the area to the wider West Midlands and to the North and the South through the M6 and M1.

As such, both the 'broad location' and the Tarmac Site meet the requirements of the road accessibility criterion.

Power Supply – sites should be located where there is potential to access sufficient power.

The 'Prologis Park broad location' is an established employment site with high profile occupiers such as JLR and DHL. It is therefore evident that there is significant energy infrastructure in this location.

The Tarmac Site is located on the opposite side of the A45 from Prologis Park. The existing service and utility infrastructure for Prologis Park / Ryton-on-Dunsmore can be extended to serve the Site. Further evidence to support this can be provided if necessary.

As such, both the 'broad location' and the Tarmac Site meet the requirement for access to a sufficient power supply.

Labour Availability – accessibility to labour is an important consideration.

The 'Prologis Park broad location' and the Tarmac Site have excellent access to a wide labour pool. The Tarmac Site is accessible, both via the strategic road network and via public transport including bus routes 25, 25A and 25X which currently stop on the A45, to a number of large settlements such as Rugby and Coventry. More locally, it is located in close proximity to the settlement and local labour pool of Ryton on Dunsmore.

As such, both the 'broad location' and the Tarmac Site meet the requirement for access to labour.

Neighbouring Activities – sites should be located away from incompatible land uses.

The existing Prologis Park is located adjacent to the western boundary of the village of Ryton on Dunsmore, with existing sheds in close proximity to residential dwellings.

The Tarmac Site is located to the north Prologis Park, and abuts the north western boundary of the settlement. There is however potential for acoustic attenuation and a landscaping buffer to be located between any employment buildings and existing dwellings. This could have the potential to include mature tree planting to ensure that any impact is immediate. This will assist in screening the development from existing residential dwellings, as well as having a range of other ecological and landscape benefits. The development of the Site would not therefore bring employment uses any closer to existing dwellings within the village. As such, it is considered to meet the requirements of this locational criterion, having the potential to separate employment from residential land uses.

The 'broad location' and the Tarmac Site meet all of the location criteria for providing new employment floorspace outlined within the HEDNA. They therefore represent a suitable location for employment land growth.

4. How can we provide more space to allow existing businesses to expand?

Both the HEDNA and Issues and Options document identify that there is a clear need for more employment land within the Borough. The HEDNA identifies that over time, buildings in B8 use will reach the end of their economic life due to technological advances and occupiers outgrowing the spaces. It is therefore critical that additional B8 floorspace is provided to allow business to grow and expand. Paragraph 10.18 of the HEDNA states '*a consequence of this process is that new sites need to be brought forward (or new plots at existing sites) in order to allow occupiers to re-locate to new buildings, thereby releasing the existing facility for refurbishment or demolition*.' It is therefore clear that additional B8 floorspace is required within Rugby Borough to allow existing businesses to expand.

When considering locations for additional B8 or other employment floorspace to allow existing businesses to expand, sites adjacent to existing employment sites would be beneficial in enabling the expansion of existing businesses. Expanding existing employment locations will mean that much of the infrastructure required to support additional floorspace will already be in place, or be capable of being extended.

As detailed in responses to earlier questions, it will be critical to ensure that land is allocated to meet local B8 floorspace requirements to allow existing B8 businesses to expand when current premises are outgrown or meet the end of their useful life. Without this provision, there is a danger that local B8 employment will need to move outside of the Borough to find suitable premises.

5. We are minded to allocate sites specifically for industrial (B2) and light industrial (E(g)(iii)) uses. Do you support this and if so, where?

The specific allocation of land for industrial and light industrial uses within the Plan is supported to maintain the industrial / manufacturing sector. However, consideration must also be given to the need to specifically allocate land for both strategic and local B8 use too.

The Tarmac Site would be suitable for a strategic or local B8 allocation or a B2 or E(g)(iii) allocation due to its proximity to existing employment sites at Prologis Park and its access to the strategic road network. It is strategically located to serve both Rugby Borough and to address any unmet employment needs arising from Coventry.

6. Are there exceptional circumstances that mean we should amend Green Belt boundaries to meet the need for employment land?

Paragraph 145 of the NPPF states that *'Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process*.'

Paragraph 147 goes on to state that '*When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.*'

The HEDNA has identified a specific need for additional employment land within Rugby Borough. In addition, Rugby may need to assist Coventry in meeting its employment needs. As part of the examination of the current Local Plan, alternatives to releasing Green Belt land to meet the employment needs of Rugby and Coventry were assessed. In order to meet these employment needs, a review of Green Belt boundaries was considered to be justified. This situation is likely to remain unchanged and therefore exceptional circumstances exist to warrant a review of Green Belt boundaries in Rugby Borough.

The western part of Rugby Borough is constrained by Green Belt, however it is also a logical location for employment expansion, particularly for B8 use, given its proximity to the strategic highway network and the City of Coventry and its labour pool. As such, it is considered that the western part of the Borough

would promote a sustainable pattern of employment development, in particular through the expansion of existing employment locations such as Prologis Park at Ryton.

The HEDNA's Paragraph 11.26 highlights the necessity for development in the Green Belt to satisfy the identified strategic B8 demand within Warwickshire and Coventry. Given the scale of sites needed to fulfil B8 demand, along with the related transport and infrastructure needs, finding suitable locations for strategic B8 that are not situated within the Green Belt, whilst also being located along key transport corridors, would be difficult.

Paragraph 143 of the NPPF notes that the Green Belt serves five purposes;

a) to check the unrestricted sprawl of large built-up areas;
b) to prevent neighbouring towns merging into one another;
c) to assist in safeguarding the countryside from encroachment;
d) to preserve the setting and special character of historic towns; and
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

A brief assessment of the Tarmac Site against each of these criteria is set out below and considered further in the accompanying Green Belt report:

a) Ryton-on-Dunsmore is not a large built up area. As such, the development of the Site will not lead to the unrestricted sprawl of large built up areas;
b) Development on the Site would not cause the boundary of Ryton on Dunsmore to be any closer to Coventry than existing and would therefore not cause neighbouring towns to merge;
c) whilst the development of the Site would lead to the encroachment into the countryside, as would any other Green Belt site, the Site can create new defensible Green Belt boundaries, as discussed below;
d) Neither Ryton-on-Dunsmore nor Coventry are Historic towns and thus this test does not apply; and
e) As identified above, Rugby Borough would not be able to meet its employment need by solely allocating in brownfield land, particularly given the likely scale of B8 sites required. Thus green field / Green Belt sites must be considered.

The Tarmac Site is therefore not considered to meet purposes a), b) or e) of the Green Belt (purpose d) does not apply). Whilst there may be some impact in terms of purpose c), this is not unique to the Site and would likely apply to any Green Belt site located within the broad locations for employment growth.

The Site has the ability to create new defensible Green Belt boundaries, in accordance with Paragraph 148f of the NPPF. The western boundary of the Site borders a sewage treatment works and the western boundary is located adjacent to the settlement of Ryton on Dunsmore. Adjacent to the northern boundary of the site lies dense woodland planting at Steetly Meadows. This, coupled with the River Avon beyond, enables the creation of a new defensible Green Belt boundary. The potential for structural planting along the Site edges would further strengthen these new Green Belt boundaries.

Climate Change Policies

21. Should we adopt a minimum tree canopy policy for new development?

Whilst recognising the importance of on-site landscaping and BNG concerns, it is considered that landscape impacts should be assessed on a case-by-case basis as per policy NE3 of the adopted Local Plan, or any policy designed to replace it. This will assist in ensuring that policy requirements are not overly restrictive or have an undue impact on site viability.

22. Should we identify priority locations or allocate sites for biodiversity net gain for sites which are unable to provide all the net gain on site and, if so, where?

Following the passing of the Levelling Up and Regeneration Act in 2023, biodiversity net gain is more important than ever. It is anticipated that the Government's requirement for 10% biodiversity net gain on all sites will come into force on 12th February 2024.

A comprehensive and consistent approach to providing biodiversity net gain will deliver greater ecological benefits than a piecemeal approach and will also provide more certainty for developers through a credit-purchase scheme. As such, it is considered that the Local Plan should allocate sites for biodiversity net gain and we are fully supportive of this.

24. Should we require developers to prioritise the delivery of biodiversity gain within close proximity to the development?

As above, a comprehensive biodiversity net gain approach will provide benefits for both Rugby Borough and the planning system. The benefits of a comprehensive approach are considered to be significant. If the delivery of biodiversity net gain was required in close proximity to a development site, this would result in piecemeal / smaller scale net gain sites which would not deliver the ecological benefits of a more comprehensive approach. As such, it is considered that biodiversity net gain should not need to be secured in close proximity of a development site.

26. We are considering requiring all new non-residential developments to be net zero. Do you agree?

Carbon Net-Zero is an issue of growing importance. Paragraph 194 of the National Planning Policy Framework requires planning policy and decisions to operate on the assumptions that regulatory regimes are operating effectively, rather than trying to establish these regimes themselves, potentially conflicting with pre-existing framework and further delaying the planning process.

Whilst we are supportive of the principle of low carbon solutions, it is important to establish what 'net zero' is to be base-marked against in order to provide meaningful comment on this question. There is insufficient evidence within the Issues and Options Document to comment further on this. It is requested that additional evidence and information is included within future iterations of the Local Plan Review to enable us to comment further.

28. Should we require non-residential development to meet higher water efficiency standards to reduce water usage?

Whilst we are supportive of the principle of introducing water efficiency standards, insufficient information is provided in the Issues and Options document regarding what these standards are 'higher' than. Further iterations of the Plan should provide additional evidence and information for stakeholders to be able to effectively comment further.

It is understood that an update to Building Regulations will introduce water efficiency standards for non-residential development. In accordance with Paragraph 194 of the NPPF, planning policies should not seek to control emissions where there is a separate control regime. As such, a specific policy on water efficiency standards for non-residential development should not be adopted if this matter is covered by building regulations.

Design coding and guidance

29. Should we produce design codes as part of our new local plan?

Tarmac recognises the importance of good design. This is especially important considering the emphasis on creating 'beautiful places' in the revised NPPF in Section 12.

However, we are not supportive of a Design Code being produced as part of the Local Plan process. It is likely to be difficult to produce a meaningful code that takes account of the design and character areas of the entire Borough. Furthermore, a Design Code is a considerably involved document and its Borough wide preparation would lead to extensive delays to the Local Plan process. The NPPF encourages Local Authorities to adopt Local Plans as quickly as possible. The Issues and Options consultation document notes that the council lacks capacity to do this themselves at present, and would need to seek external resources.

30. Which areas should design codes cover?

Following consideration of the options provided, it is considered that the most appropriate approach for design code coverage would be to require design codes at large new development level. This will ensure that design codes are specific and context-relevant to the areas they target, enabling a sensitive and considerate approach. As detailed above, it would be difficult to achieve this level of discretion if design codes were to be produced at a Borough-wide level.

Other topics

36. Are there any other issues or policies (not covered by the questions above) that we should cover in the new plan?

Further to our responses to questions in relation to employment floorspace, the lack of consideration for local B8 floorspace provision across the Plan Period gives cause for concern. The HEDNA considers local B8 use alongside general and light industrial uses. Whilst the Issues and Options document considers the need to identify allocations to meet both light and general industrial uses, it does not consider the need to identify sites specifically to meet local warehousing demand.

The HEDNA is clear that B8 buildings have a relatively limited lifespan and the Issues and Options consultation document outlines an aspiration to allow the growth of existing employment businesses. By not allocating land specifically for local B8 provision, existing local businesses who have outgrown their existing premises or are operating out of buildings which have reached the end of their useful life, may be forced to relocate outside of the Borough.

Evidence should be prepared to consider requirements for local B8 floorspace and allocations should be made within the Plan to support this sector.

37. Do you support our intention to bolster our policies on sustainable travel?

Policies to enhance sustainable travel options within the Borough are supported in principle.

In terms of the Prologis Park broad location for employment floorspace, there are existing bus services that run between Coventry and Rugby (25, 25A, 25X) which currently stop on the A45. Sustainable transport facilities could be enhanced as part of any future development of the Tarmac Site.

Conclusions

We welcome Rugby Borough Council's decision to review their Local Plan and note the various elements where they have committed to being forward looking and proactive. Rugby Borough are committed to providing land for employment growth and note that there may be a need for the Borough to contribute to meeting unmet strategic warehousing land arising from neighbouring Coventry.

The Coventry and Warwickshire HEDNA identifies a need for additional strategic B8 floorspace within Rugby Borough. In addition, a requirement for additional E(g)(iii) and B2 uses are identified. We consider that the best way to accommodate this required growth would be through the allocation of sustainable sites adjacent to existing established employment locations. The Tarmac Site, Brandon provides a sustainable solution and a logical expansion of the Prologis Park Ryton. The accompanying Call for Sites submission confirms that there are no barriers to developing the Site for employment (either B2 or strategic/local B8) use and that the Site is suitable, available and developable.

The Site's proximity to Coventry City Council's boundary and established strategic and public transport links places it in good stead to contribute to meeting the unmet Coventry and Warwickshire need whilst also providing employment floorspace to meet Rugby Borough's demand.

However, we are concerned regarding the lack of consideration to providing specific local B8 allocations within the Local Plan. Further consideration should be afforded to this to support this sector in future iterations off the Plan.

We trust that you will take these comments as helpful in progressing the Local Plan. Should you require any further information, please do not hesitate to contact me as per the details of this letter.

Yours faithfully,

[redacted]

[redacted]

[redacted]

Legend

Brandon Site (62.37 Ac / 25.14 Ha)

TARMAC
A CRH COMPANY

Site Name:
B344 Brandon

Drawing Name:
Brandon Site Plan

Drawn By:	Scale @ A3:
[redacted]	1:5,000
Date:	**Drawing No:**
06/07/2023	B344-00044-1

N

Call for Sites Proforma

Housing and Economic Land Availability Assessment (HELAA)

Call for Sites Proforma

- Please complete this form if you would like to suggest proposals for future land use and development within Rugby Borough on sites capable of delivering 5 or more homes, or sites larger than 0.25ha.
- The sites will be assessed as part of the HELAA and used as an evidence base document for the Local Plan preparation process.
- Please complete a separate form for each site. Complete each section clearly and legibly to the best of your knowledge. If you require more space, please use Section 9, or append additional pages.
- You must attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site and details of site ownership.

Data Protection Disclaimer
Details submitted to the council as part of a call for sites will help inform the HELAA and assist in identifying land for development to contribute to a land supply to meet local need. The submitted information will not be confidential as it will be published as part of a comprehensive land assessment via published reports available for public consumption. This information will also be shared with other parties, including employees of the council, other council departments and third parties, such as the Planning Inspectorate and other Local Planning Authorities.

Details provided in Section 1 will be kept and stored confidentially by the Council. Details in Section 2, the names of which should match those provided in Section 1, will be made publicly available as established above. As such, only names of organisations/agents/applications will be made public where it has been clearly declared through this submission form. No other details, such as addresses or contact information, will be made available.

By submitting this form to the Council, you are providing consent for us to retain your details on our Planning Policy as part of the Call for Sites process, the HELAA and to enter your details to our consultation database so that we may contact you in future to advise on the Local Plan preparation process.

1. Your Confidentially Held Details				
Title	[redacted]	**Name**	[redacted]	
Organisation (if relevant)	[redacted]		**Representing**	Tarmac Trading Limited
Address	[redacted]			
Postcode	B2 5AL	**Telephone**	[redacted]	
Email	[redacted]			
Signature				
Date				

2. Your Publicly Viewable Details	
Name/Organisation	[redacted]
Status in relation to site	Planning Agent
Representing (if applicable)	Tarmac Trading Limited

3. Site Location			
Site Name	Tarmac Site, Ryton on Dunsmore		
Site address (inc. postcode if known)	[redacted]		
OS Grid Easting	438023	**OS Grid Northing**	274863
Total Site Area	62.37 Ha	**Developable Area**	TBC

Please attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site. The area of the site you wish to be formally assessed should be enclosed by a red line. Any other relevant land under your ownership should be enclosed by a blue line

4. Site ownership (please mark as appropriate and/or provide details)				
Do you own the site?	**Yes – sole owner**	Yes – part owner	Yes – acting on behalf of the owner(s)	No

Is the site available?	**Yes – immediately**	Yes – In 5-10 years	Yes – 11+ years	No
Have you notified the landowner/other landowners that you have submitted the site?			**Yes**	No
Other relevant information e.g. is there a promotion / option agreement, is a developer on board etc.				

5. Site Constraints (on site or at boundary – please mark as appropriate and/or provide details)					
Current/previous use	The Site is currently greenfield and comprises a number of fields bordered by trees and hedgerow. It includes a pond within the western extent and there is a public right of way to the east.				
Adjacent land uses	To the south, the Site borders the A45 London Road with an existing B8 employment area on the opposite side of the carriageway where occupiers include Jaguar Land Rover and DHL. To the east are residential properties along Church Road and to the west is a Sewage Treatment Works. To the north is dense tree cover and the River Avon.				
Planning History					
Existing Infrastructure	Electricity: Not currently but supply easily achievable	Gas: Not currently but supply easily achievable	Mains Sewer: Not currently but supply easily achievable	Mains Water: Not currently but supply easily achievable	Telecoms: Not currently but supply easily achievable
Access from Highway	Yes – Classified Road – A45				
Highway Works	The Site can be accessed via an upgraded access from the A45 – a summary of potential transport options is included in the attached note.				
Ransom Strips/ third party land required etc.	None known.				
Legal Issues	None known.				
Existing Occupiers					

Public Access/Rights of Way	Southeast corner of the site is bisected by a public right of way.		
Ecology/Wildlife Designations and other known issues	The far West of the site contains the Ryton and Branson gravel pits Site of Special Scientific Interest (SSSI). Near to the north of the site is the Brandon marsh SSSI. Steetley meadows wildlife refuge is also located on the northern edge of the site.	Reports/Mitigation Strategy: An ecology assessment will be undertaken for the Site, as well as a GCN Survey given the proximity of water bodies to the Site. Buffer planting will be incorporated into the development to limit any impact on nearby ecological areas. Tarmac have previously provided land for ecological purposes around the site and will continue to look at options in this regard to secure ecological additionality. Examples include Streetly Meadows Conservation Area and the Dunsmore Pollinator Trail.	
Trees, hedgerows and woodlands (e.g. TPOs, other protections and designations)	There are a number of trees and hedgerows present within the Site and on its boundaries. There are no known TPOS located within the Site.	Reports/Mitigation Strategy: An Arboricultural Survey will be prepared to inform the development strategy for the Site. Trees and hedgerow will be retained where possible and additional planting will be provided.	
Land Contamination /	No issues known.	Reports/Mitigation Strategy: A Ground Investigation Survey will be undertaken to confirm the position on this; however the site is a greenfield site.	
Heritage Designations (e.g. listed buildings, conservation areas, local list, archaeology etc)	Site itself does not contain any heritage assets. Grade II* listed Church of St Leonard and a Grade II war memorial are located to the east however their setting is unlikely to be affected to a significant degree.	Reports/Mitigation Strategy: A Heritage Statement will be prepared to consider the impact on the development on the significance of these assets and their setting. A conclusion of less than substantial harm is anticipated given the intervening built development (and the A45 in respect of the war memorial). Screen planting can be provided as necessary.	

Flooding	Majority of the Site is located in flood zone 1. Some areas of the northern boundary are in flood zone 2. There is a limited amount of surface water flood risk within the eastern part of the site.	Reports/Mitigation Strategy: A Flood Risk Assessment will be undertaken to inform the development of the Site. All built development will be directed to areas within Flood Zone 1.	
Other Physical Constraints (flooding, topography)	None	None	
Infrastructure Constraints (e.g. pylons, gas mains, telecommunications etc)	Existing utilities provision is available locally given the village of Ryton on Dunsmore and Prologis Park	Reports/Mitigation Strategy: A Utilities Report will determine any capacity issues, however it is considered that the existing services will be capable of being expanded from Prologis Park and / or Ryton on Dunsmore.	
Open space and recreation (e.g. playing pitches, parks and gardens, allotments and orchards etc)	N/A	Reports/Mitigation Strategy:	No
Other Knowns Issues/Constraints	A separate review of the Site against the purposes of the Green Belt is appended in our Rugby Local Plan Issues and Options consultation response.		

6. Site Accessibility (please provide distance as measured from the middle of the site "as the crow flies" and utilise journey planner to determine walking time)			
Distance to closest bus stop (m/km)	540m	**Walking time to closest bus stop (mins)**	3mins

Distance to closest amenities (m/km)	Doctors: 2.9km Shop: 0.8km Supermarket: 1.9km Church: 0.6km	**Walking time to closest amenities (mins)**	Doctors: 37mins Shop:14 mins Supermarket: 28mins Church: 7
Distance to closest rail station (m/km)	6.1km	**Walking time to closest rail station (mins)**	97mins
Any known issues with public transport – frequency of services etc	No	**Any known issues with amenities e.g. limited capacity at schools, GPs etc**	N/A
Other accessibility issues relevant to the nature of the proposal	None known.		

7. Previous site promotional work (please cross reference with Section 5 where relevant)		
Has any work been undertaken to promote the site and/or to overcome constraints?	Yes	
The Site was previously promoted in the Rugby Borough Strategic Land Availability Assessment - Call for Sites Register in Summer 2013. The site features as reference number S14/089.		
Have any viability appraisals been undertaken?	Yes	**No**
If yes, please provide more details and provide copies of reports where available: N/A		
Are there any specific or immediate intentions to start development?	Yes	**No**
If yes, please provide more details (such as Pre-application discussions)		

N/A

8. Proposal Details (please mark as appropriate and/or provide details)					
Description of Proposed Development	Employment use – potential for local or strategic B8 or B2 uses.				
Proposed Land Use	Residential	**Employment**	Retail	Mixed	Other
Site capacity/density (homes/floor space)	TBC		**Details of mixed/other land uses**		
Potential Development	For sale/marketed for development		Negotiations with developer	In control of developer	**Ready for release by owner**
Development time scales	**Short term (within 5 years)**		Medium term (6-10 years)	Long term (11-15 years)	Beyond (16+ years)
Development Timescale/Phasing (incl. build-out rates)					

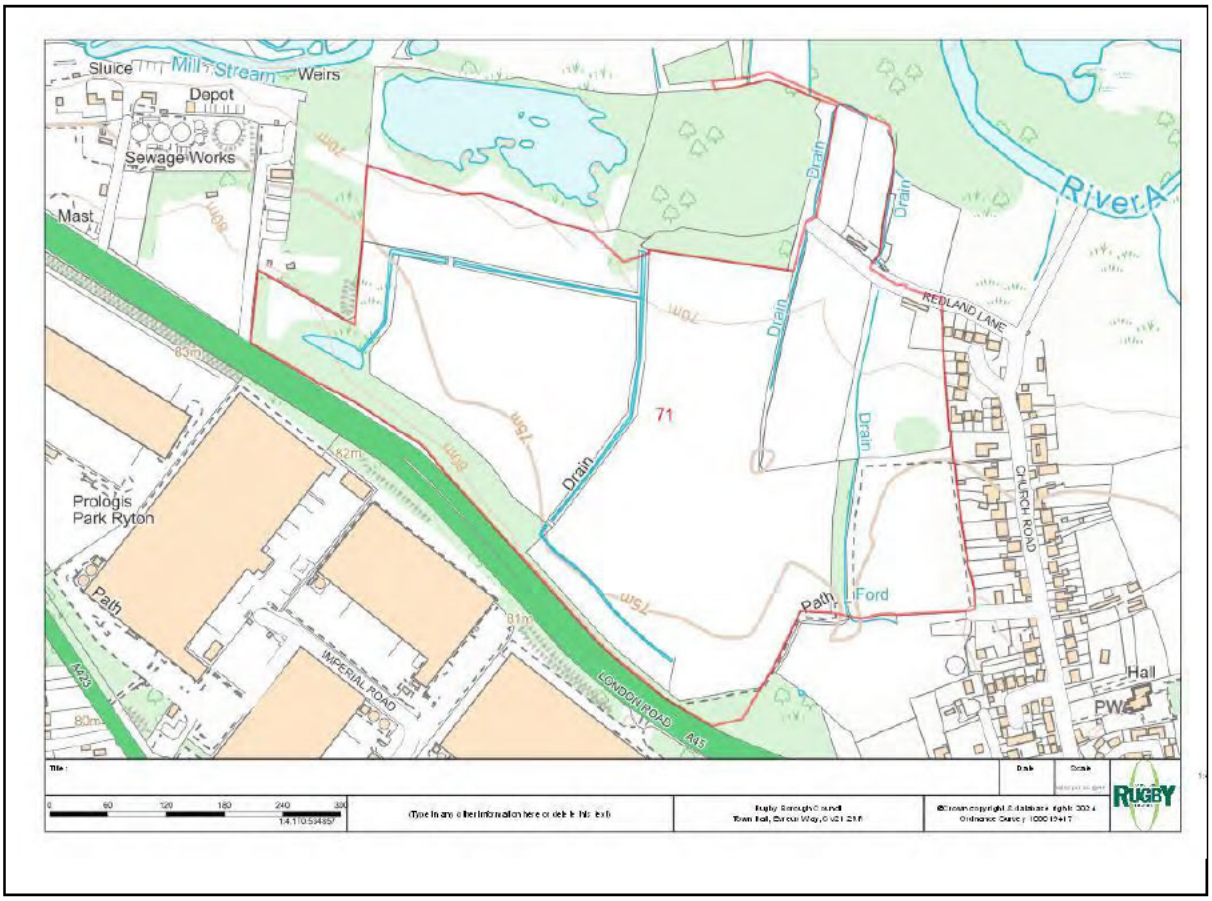
9. Additional information e.g. relevant evidence, other constraints and challenges, market desirability, planned infrastructure, opportunities etc
The Site benefits from a sustainable location with direct access onto the A45, leading to the wider strategic highway network. This makes it a very attractive location for employment occupiers. It is accessible via public transport to a wide labour pool, including Rugby, Coventry and Ryton on Dunsmore. Being located on the border with Coventry City, it presents an excellent location to meet any unmet employment need arising from Coventry. Further details are included in our accompanying representations to the Rugby Borough Issues and Options Local Plan.

10. If the site fits the criteria for a brownfield site are you happy for us to include it on the relevant LPA brownfield land register (tick as appropriate)	
Yes	No

Appendix III

Stage 2 Site Options Assessment – Site 71

Site 71: London Road, Ryton-on-Dunsmore



Ward: Dunsmore Ward
Parish: Ryton-on-Dunsmore
Proposed use: Employment
Potential yield (employment, sqm): 85560
Potential yield (residential): 0

Topic area	Evaluation summary
Transport	The site is accessed from the A45. National Highways were asked to provide initial comments and provided: Site is bounded by the A45 to the south and would be likely to be accessed via the A45. Therefore potential for significant impacts on the SRN, especially due employment trips from Coventry via the Tollbar End roundabout. Cumulative impact along with the Prologis Park Ryton West (Site 50) and Mountpark Ryton (Site 61) would be required. In addition, their initial review considers levels of physical highway mitigation required in order to ensure that impact on the strategic road network from development on the site is addressed, ranging from low, medium to high. The current level of concern for this site is High.

	In terms of the capacity of the road network, an assessment of junctions within a nominated distance of the site was undertaken to determine congestion levels at peak and non-peak times. The roads surrounding the site were assigned a congestion rating of category 6, with 1 being the most congested and 6 being less congested. The distance to the nearest bus stop from the site is 202m. The Public Transport Accessibility Level (PTAL) is a measure of the accessibility of a location to the public transport network, taking into account walk access time and service availability. The site has a PTAL score of 1a for both AM and PM which would not be improved by proposed and recent public transport improvements. PTAL is measured on a 1-6 scale, with 1 being the least accessible and 6 being the most accessible. Using other data, including an assessment of walking and cycling, and locations from the site accessible within a 1 hour bus journey, the overall accessibility of the site is ranked 40 of the 125 sites considered as part of Rugby's current site assessment. This measures accessibility at a middle layer super output area level, rather than site specific accessibility. So it only provides information on accessibility for the part of the borough in which the site lies.
Ecology	There are high ecological constraints at Site 71. Given the presence of Ryton and Brandon Gravel Pits SSSI within the site boundary, the location of Brandon Marsh SSSI immediately adjacent to the site, the location of LWSs within (River Avon and Tributaries) and adjacent (Steetley Meadows) to the site and coverage of more than 40% of the site with habitat of medium to high distinctiveness, it is concluded that there are considerable constraints to the development of Site 71. It is therefore recommended that alternative sites be identified which may be more ecologically suitable for development of this scale.
Landscape	The overall landscape sensitivity of the site is Medium/Low. The site consists of pastoral fields enclosed by hedgerows with tall trees and areas of woodland, with views largely obscured from surrounding roads. The surrounding trees create a strong sense of enclosure, although noise from vehicular traffic along the A45 acts as an aural detractor. A geological SSSI is located within the site and priority habitats are found to the north at Brandon Marsh Nature Reserve. Located at the urban edge of Ryton-on-Dunsmore, the site is adjacent to warehousing developments along the A45 which are partially visible from PRoWs within the site.
Heritage	There were no designated heritage assets identified within 50 metres of the site.
Other constraints	The site is entirely within the Green Belt, potentially making a strong contribution to at least one purpose. Constraints for foul water drainage are assessed as Medium, constraints for surface water drainage are assessed as Low.
Opportunities/benefits	Employment (B2 and B8).

Outcome of further assessment: Not progressed

Reasoning: The site consists of pastoral fields enclosed by hedgerows with tall trees and areas of woodland.

The surrounding road network is relatively uncongested, and the site has moderate accessibility. The site is proximate to a future workforce in Coventry.

There are no heritage constraints identified, and landscape sensitivity is medium/low. The site is within the Green Belt.

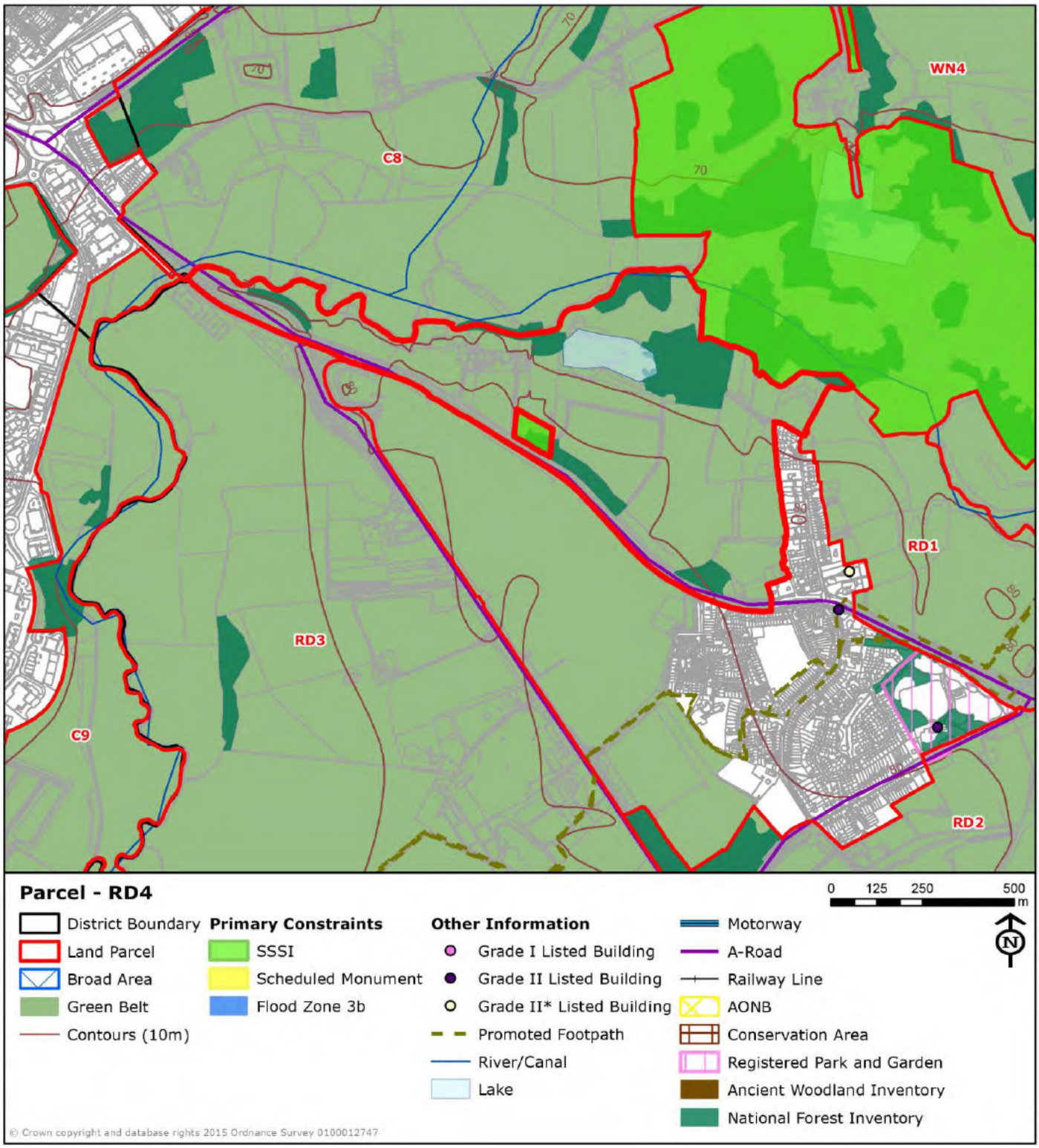
There are high ecological constraints with the Ryton and Brandon Gravel Pits Site of Special Scientific Interest within the site boundary, and the location of Brandon Marsh SSSI immediately adjacent to the site, the location of LWSs within and adjacent to the site and coverage of more than 40% of the site with habitat of medium to high distinctiveness.

In view of the high ecology constraints the site is not progressed past the Stage 2 Assessment.

Appendix IV

Joint Green Belt Study – Land Parcel RD4

Land Parcel Ref:	RD4	**Main Authority:**	Rugby Borough Council
Parcel Type:	Land Parcel		



Main Authority:	Rugby Borough Council
Other Authorities:	N/A

Land Parcel Ref:	RD4	**Main Authority:**	Rugby Borough Council
Parcel Type:	Land Parcel		

Purpose 1 - To check the unrestricted sprawl of large built-up areas

Issue 1a - Ribbon development

Does the parcel play a role in preventing ribbon development and/or has the Green Belt within the parcel already been compromised by ribbon development?

Score: 1

Notes:

Ribbon development has not and is unlikely to occur along the dual carriageway that follows the southern border of the parcel. However, the parcel plays some role in preventing ribbon development along Redland Lane.

Issue 1b - Openness

Is the parcel free from development?
Does the parcel have a sense of openness?

Score: 1

Notes:

The thin strip of land in the western half of the parcel in between London Road and the River Avon contains an open air construction and demolition recycling facility and associated buildings, many of which are derelict. In addition, the western part of the parcel contains a sewage treatment works. The buildings associated with these land uses have compromised the openness of the Green Belt in the western half of the parcel; however, the eastern half of the parcel is free from development, being made up of open arable fields.

Land Parcel Ref:	RD4	**Main Authority:**	Rugby Borough Council
Parcel Type:	Land Parcel		

Purpose 2 - To prevent neighbouring towns merging into one another

Issue 2a - Location of parcel and distance between neighbouring settlements

Is the parcel located within an existing settlement?
If no, what is the width of the gap between the settlements at the point that the parcel is intersected?

Score: 4

Notes:

Measured from the junction of London Road and Oxford Road at the western end of the parcel, the parcel plays a separating role in preventing the new industrial estate adjacent to Ryton on Dunsmore from merging with Coventry roughly 650m to the north west.

Land Parcel Ref:	RD4	**Main Authority:**	Rugby Borough Council
Parcel Type:	Land Parcel		

Purpose 3 - To assist in the safeguarding of the countryside from encroachment

Issue 3a - Significance of existing urbanising influences

Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside?
Has the parcel already been affected by encroachment of urbanised built development?

Score: 1

Notes:

The thin strip of land in the western half of the parcel in between London Road and the River Avon contains an open air construction and demolition recycling facility and associated buildings, many of which are derelict. In addition, the western part of the parcel contains a sewage treatment works. The buildings and hardstanding associated with these land uses represent urbanising influences on the Green Belt and thus act as encroachment of the countryside in the western half of the parcel; however, the eastern half of the parcel is free from urbanising influences being made up of open arable fields.

Issue 3b - Significance of boundaries / features to contain development and prevent encroachment

Are there existing natural or man-made features / boundaries that would prevent encroachment in the long term? (These could be outside the parcel)

Score: 0

Notes:

This relatively thin strip of Green Belt is follows London Road (a dual carriage way) at its southern boundary and the River Avon at its northern boundary. Both of these boundaries are significant in preventing future encroachment of the Green Belt immediately to the north and south of the parcel. Furthermore, these boundaries meet at the westernmost pint of the parcel, preventing further encroachment of the countryside to the west.

Land Parcel Ref:	RD4	**Main Authority:**	Rugby Borough Council
Parcel Type:	Land Parcel		

Purpose 4 - To preserve the setting and special character of historic towns

Issue 4a - Parcel forms an historical and/or visual setting to the historic town

Is the parcel partially or wholly within or adjacent to a Conservation Area within an historic town?
Does the parcel have good intervisibility with the historic core of an historic town?

Score: 0

Notes:

The parcel does not overlap with a Conservation Area within an historic town. In addition, there is no intervisibility between the historic core of a historic town and the parcel.

Land Parcel Ref:	RD4	**Main Authority:**	Rugby Borough Council
Parcel Type:	Land Parcel		

Purpose 5 - To assist in urban regeneration by encouraging the recycling of derelict and other urban land

Issue 5a - The need to incentivise development on derelict and other urban land within settlements

All parcels make an equally significant contribution (+4) to this purpose.

All Green Belt makes a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites.

The Local Authorities involved in this review are covered by the Coventry and Warwickshire Housing Market Area (HMA). Defining the area as an HMA reflects the key functional linkages that operate between where people live and work and the household demand and preferences that define the area. As the whole Housing Market Area functions as one unit, this makes it difficult to accurately assess whether one individual parcel considered in isolation makes a more significant contribution than another to incentivising development on previously developed land. What can be said is that all parcels make an equally significant contribution to this purpose and are each given a score of 4.

Land Parcel Ref:	RD4	**Main Authority:**	Rugby Borough Council
Parcel Type:	Land Parcel		

Score Summary

Purpose 1 Score:	2	/4
Purpose 2 Score:	4	/4
Purpose 3 Score:	1	/4
Purpose 4 Score:	0	/4
Purpose 5 Score:	4	/4
Total Score:	11	/20

Appendix V

Market Commentary

Tarmac, Brandon, Market Commentary

Demand for 'big box' industrial units (i.e. >100,000 sq ft) is high at a national scale driven by a range of trends. These include:

- **On-shoring:** The impacts of Brexit, COVID-19, war and tariffs on trade are encouraging occupiers to increase their stock holding and contingency capacity to increase resilience in supply chains. This is driving demand for large footprint industrial units.
- **Automation:** The development of new advanced technology is leading to an increase in automation across many industrial sectors. This is creating demand for industrial units with greater building heights, particularly those in excess of 20m, and good levels of electrical power.
- **E-commerce:** The UK has among the highest penetration of online sales in the world and the various COVID-19 lockdowns accelerated this trend. Increasing consumer demand for food and non-food products from online retailers has driven additional need for a range of industrial unit types from multi-million square foot buildings to last mile logistics facilities.

The East and West Midlands are *the* most in-demand locations in the country for 'big box' industrial units given their strategic location. They sit within the *Golden Logistics Triangle* which means that 90% of Great Britain's population can be reached within a four-hour drive.

The attractiveness of these areas is reflected in Avison Young's latest *Big Box Bulletin* (2024) which indicates that 52% of 'big box' units taken up across the country in 2024 were in the East and West Midlands:

- 32% was taken up in the East Midlands equating to 6.8m sq ft.
- 20% was taken up in the West Midlands equating to 4.2m sq ft.

Within the East and West Midlands there are, however, some locations that are more attractive for 'big box' industrial occupiers than others.

One of the most attractive areas is the Coventry and Warwickshire sub-region[1], particularly the districts surrounding the site – Rugby, Coventry and North Warwickshire.

Research undertaken by Avison Young in early 2024 indicates that these three districts have significantly more 'big box' floorspace than other districts in the sub-region reflecting their strategic geographical positions – collectively they have 36.9 million sq ft of 'big box' floorspace compared to 26.5 million sq ft across the three other districts in the sub-region (i.e. Stratford-upon-Avon, Warwick and Nuneaton & Bedworth)[2].

Market signals underpin the notion that demand for 'big box' industrial units is strong in these three districts.

In early 2025 'big box' vacancy rates sat below 7% across all three districts indicating a highly constrained market[3].

At the same time, headline rents have increased significantly over the last ten years and now sit at between £9.50 and £10 psf for high quality big-box floorspace, as per information from Avison Young's in-house industrial agency team. They tend to be lower in the sub-region's more southern districts (notably Stratford-upon-Avon) though this in part reflects a lack of 'big box' transactions in these areas.

This market interest is reflected in a high take up of 'big box' units across the three districts in recent years. Notable deals that have taken place include:

- Iron Mountain pre-letting 964,000 sq ft space over four units at Symmetry Park in Rugby.

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[1] This covers Rugby, Coventry, North Warwickshire, Stratford-upon-Avon, Warwick and Nuneaton & Bedworth districts.
[2] Data from CoStar, 2024.
[3] Data from CoStar 2025.

- Syncreon taking 600,000 sq ft of space at Segro Park Coventry Gateway.
- Hoover Limited taking on 376,563 sq ft at DC1, Central Park Rugby.
- Staircraft leasing 174,600 sq ft at Ansty Park, Coventry.
- CEVA Logistics pre-letting 330,000 of sq ft at Prologis Park Ryton
- Sainsbury's letting 660,000 sq ft at Rugby 661, Rugby.
- Furnolic taking on 166,820 sq ft at Prologis Park Ryton.
- Ifco Systems taking on 328,305 sq ft at Prologis Park, Coventry.

Information from Avison Young's agency team indicates that there are also a large number of live enquiries for 'big box' industrial space across the East and West Midlands further illustrating market interest in the area. Between April 2023 and March 2025, we are aware of 745 enquiries in the Midlands for Big Box space. Examples include:

- DARLS holding an enquiry for 300,000 – 400,000 sq ft of space within the Coventry area.
- Marks and Spencer with an enquiry for 1.2m sq ft of space between Birmingham and Northampton.
- AAH Pharmaceuticals with an enquiry for 300,000 – 400,000 sq ft in the West Midlands.
- DHL with an enquiry for 400,000 – 500,000 sq ft in the West Midlands.

It is recognised that there is some supply coming forward in the sub-region that will offer similar types of units to those being proposed on the site – this will meet some market demand. These sites are largely limited to Segro Park Coventry, Gateway Symmetry Park Rugby, Wilsons Lane Coventry, Ansty Park Coventry, Redditch East Gateway, Prologis Park Ryton. At a smaller scale, we are aware of some speculative development coming forward at Total Park, Rugby and Greenlight, Redditch.

It is considered unlikely that these sites will meet all sub-regional demand given the scale of demand at sub-regional, regional and national levels.

Their relatively close proximity also represents an economic opportunity to create an even stronger cluster of 'big box' logistics activity.

The importance of this activity is strongly emphasised in the new National Planning Policy Framework (NPPF). This sets out logistics' critical role in the economy and now recognises it as a key sector. It also encourages the development of infrastructure essential for the efficient handling of goods and requires the needs of the sector to be considered in plan-making.

The site can become a crucial part of this cluster generating positive multiplier and agglomeration effects.

The site and proposals are also likely to be highly attractive to occupiers. Beyond its position within the *Golden Logistics Triangle* it is also an ideal location for this activity because it offers:

- Adjacency to strategic road networks.
- Access to multiple trunk roads to enhance trip reliability.
- Immediacy to a suitable and plentiful labour pool.
- Strong public transport accessibility.
- Provision of appropriately sized units.
- Proximity to similar types of businesses.
- High quality physical environment.
- Links to universities and R&D.

These are all factors occupiers look for when deciding where to locate.

MKA
ECOLOGY

Preliminary Ecological Appraisal

Land off London Road, Ryton-on-Dunsmore

Site	*Land off London Road, Ryton-on-Dunsmore*
Project number	*173425*
Client name / Address	*Tarmac Trading Ltd, Ground Floor T3 Trinity Park, Bickenhill Lane, Birmingham, United Kingdom, B37 7ES*

Version number	**Date of issue**	**Revisions**
1.0	*14 May 2025*	*Original*

Author(s)	[redacted]	[redacted]
Surveyor(s)	[redacted]	
Reviewed by	[redacted]	
Authorised by	[redacted]	[redacted]
Contact	[redacted]	

Declaration of compliance

This Preliminary Ecological Appraisal has been undertaken in accordance with British Standard 42020:2013 "Biodiversity, Code of practice for planning and development". The information which we have provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

MKA Ecology Ltd is a CIEEM Registered Practice. This means that MKA Ecology Ltd are formally recognised for high professional standards, working at the forefront of our profession.

Validity of data

Unless stated otherwise the information provided within this report is valid for a maximum period of 24 months from the date of survey. If works at the site have not progressed by this time an updated site visit may be required in order to determine any changes in site composition and ecological constraints.

CONTENTS

1. EXECUTIVE SUMMARY

In April 2025 MKA Ecology Limited was commissioned to undertake a Preliminary Ecological Appraisal of Land off London Road, Ryton-on-Dunsmore. The appraisal included a habitat survey, protected species scoping survey and desktop study of protected and notable sites and species in the area. A site visit was undertaken on 5 May 2025.

The Site is located in the village of Ryton-on-Dunsmore, 5km south-east of Coventry. Habitats present include other neutral grassland, modified grassland, woodland, mixed scrub, willow scrub, ditches, river and native species-rich hedgerows. The east of the Site is publicly accessible via public footpaths; however, the majority of the Site is private access only. The proposed development is for an industrial/ commercial development comprising four larger scale and three smaller scale industrial units with associated access road and parking. A new park and open space for residents is proposed in the east of the development.

The following ecological constraints were identified at the Site with recommendations made as follows;

- **Designated sites:** There are five Sites of Special Scientific Interest (SSSI), two Local Nature Reserves (LNR), 11 Local Wildlife Sites (LWS) and six Potential Local Wildlife Sites (pLWS) within 2km of the Site. Tributaries of the River Avon, included within the LWS designation are present onsite. These watercourses must be retained, protected, buffered and enhanced. The closest SSSI is Brandon Marsh SSSI, located 130m north of the Site A Designated Sites Assessment is being produced alongside the Preliminary Ecological Assessment to assess the potential impacts of the proposed development on designated sites with 2km in line with Local Policy NE1.
- **Onsite habitats:** Lowland mixed deciduous woodland and species-rich native hedgerows, both of which are Habitats of Principal Importance (NERC Act 2006), are present and should be retained within the site design, where feasible, and protected during construction using Heras fencing, in line with Local Policy NE2.
- **Invertebrates:** The neutral grassland, woodland, hedgerow and scrub present provide limited opportunities for a range of pollinating invertebrates. It is recommended that an Invertebrate Scoping Assessment is undertaken at the Site to determine the site's suitability to support protected invertebrates and determine the requirement for further survey, if necessary.
- **Amphibians:** The grassland, scrub and woodland onsite provide suitable terrestrial habitat for amphibians and a network of seasonally wet ditches and a pond is present. An eDNA survey of all ponds within 500m of the red line boundary is undertaken to determine the likelihood of great crested newt being present. If great crested newt are confirmed, and impacts are anticipated, then a Natural England Protected Species Licence will be required.

- **Reptiles:** The tussocky field margins, scrub, ditches and woodland provide suitable habitats for reptiles, and the nearby streams and floodplains may be of particular value to grass snake, a species associated with wetlands. It is recommended to complete a reptile presence/ absence survey between April and September.
- **Birds:** The fields, hedgerows, woodland, mixed scrub, mature trees and adjacent wetland provide suitable habitat for breeding birds. There is potential for important assemblages of farmland birds to occur within the site boundary, including priority species, and these may be impacted by the development proposals. Undertake a breeding bird survey to assess the bird assemblages present and inform any mitigation measures required.
- **Roosting bats:** 11 trees were identified as possibly having features with the potential to support roosting bats. There are a number of mature trees present in the hedgerows and woodland. It is recommended that a Ground Level Tree Assessment is undertaken to classify the potential of trees onsite to support roosting bats, based on potential roost features present.
- **Foraging and commuting bats:** The hedgerows, woodland, mixed scrub, grassland and adjacent wetland are likely to be used by foraging and commuting bats. Complete a suite of night-time bat walkover surveys and static detector monitoring surveys to identify the species utilising the Site and key foraging areas and commuting routes. These surveys should be completed in accordance with the methodology set out within the Bat Conservation Trust's Good Practice Guidelines (Collins, 2023).
- **Badger:** Recent signs of badger using the Site including a latrine, holes with fresh spoil and mammal pathways and foraging signs were noted throughout the onsite grassland and woodland. Suitable foraging and sett building habitats are present throughout the Site. Undertake a badger survey between February to April inclusive and September to October inclusive.
- Brandon Wood LWS, located 1.4km north-east of the Site, is described as supporting suitable habitats for **hazel dormouse** and individuals have been identified in this woodland previously. The scrub and woodland belts onsite may provide suitable habitat for hazel dormouse. It is recommended to undertake a Habitat Suitability Assessment at the Site for hazel dormouse, which will then determine the requirement for presence/absence surveys, if necessary.
- **Other mammals:** Maintain habitat connectivity for hedgehog through the installation of at least one 13cm x 13cm hole at the bottom of each boundary fence (with a focus on fences separating residential gardens, and excluding fences adjacent to roads). These should be accompanied with appropriate signage indicating their purpose and stipulating that they should remain open.

Upon completion of the baseline surveys and finalisation of the site design, it is recommended an Ecological Impact Assessment is completed.

Protected species constraints, whilst they might need some management, are unlikely to preclude development. Proximity to local designated sites will require consideration and potential design measures to limit impacts. The site offers potential for creating habitat for key local species, such as

reedbed for bittern, wet scrubby habitat for Cetti's warbler, and mosaic habitats for invertebrates including brown hairstreak and adonis ladybird.

Development at the Site provides an opportunity for biodiversity enhancement. While the potential presence of notable species will require management during any development, there is also opportunity to improve the site for biodiversity. This could be through habitat creation and enhancement and installation of artificial habitat features. Habitat creation could include species-rich wildflower meadows, ponds and wetlands and new woodland and hedgerow planting. Any development will be required to deliver a minimum of 10% net gain in biodiversity, in line with the Environment Act (2021), assessed using the Statutory Biodiversity Metric. It is anticipated these measures will serve to deliver local and national priority habitats, helping to secure biodiversity gains and ultimately a sustainable development.

2. INTRODUCTION

2.1. Aims and scope of Preliminary Ecological Appraisal

In May 2025 MKA Ecology Limited was commissioned to undertake a Preliminary Ecological Appraisal at Land off London Road, Ryton-on-Dunsmore by Tarmac Trading Ltd in order to support an application to include this site within Rugby Borough Council's Local Plan. The proposed use of the site is for an industrial/commercial development, with the concept masterplan (TARMAC, 2024) comprising four larger scale and three smaller scale industrial units, associated access road and parking and a new park and open space for residents.

The aims of the Preliminary Ecological Appraisal were to:

- Undertake a desktop study to identify the extent of protected and notable species and habitats within close proximity of the Site;
- Prepare a habitat map for the Site;
- Identify evidence of protected species/species of conservation concern at the Site;
- Assess the potential impacts of the proposed development, using existing plans;
- Outline recommendations for further survey effort where required; and
- Outline recommendations for biodiversity enhancements.

2.2. Site description and context

The survey area is shown on the map in Figure 1. Within this report this area is referred to as the Site or Land off London Road, Ryton-on-Dunsmore. The 23ha site (centred around grid reference SP 38189 74818) is located in the village of Ryton-on-Dunsmore, 5km south-east of Coventry and it falls under the jurisdiction of Rugby Borough Council. Habitats present include other neutral grassland, modified grassland, other broadleaved woodland, mixed scrub, willow scrub, ditches, watercourses and native species-rich hedgerows. Only the east of the Site contains public footpaths.

2.3. Proposed development

The proposed development is for an industrial/commercial development, with the concept masterplan (TARMAC, 2024) comprising four larger scale and three smaller scale industrial units with associated access road and parking. A new park and open space for residents is proposed in the east of the development.

Due to the likely scale and type of project the anticipated zone of influence is anticipated to extend beyond the red line boundary. A Designated Sites Assessment is being produced alongside the

Preliminary Ecological Assessment to assess the potential impacts of the proposed development on designated sites with 2km.

2.4. Legislation and planning policy

This Preliminary Ecological Appraisal has been undertaken with reference to relevant wildlife legislation and planning policy.

Relevant legislation considered within the scope of this document includes the following:

- The Environment Act 2021;
- The Wildlife and Countryside Act 1981 (as amended);
- The Conservation of Habitats and Species Regulations 2017 (as amended);
- Natural Environment and Rural Communities (NERC) Act 2006;
- The Countryside and Rights of Way (CRoW) Act 2000;
- Protection of Badgers Act 1992; and
- Wild Mammals (Protection) Act 1996.

Further information is provided in Appendix 1, including levels of protection granted to the species considered in Section 3.3.

In addition to obligations under wildlife legislation, the revised National Planning Policy Framework (NPPF) updated on 12 December 2024 requires planning decisions to contribute to conserving and enhancing the local environment. Further details are provided in Appendix 1.

Rugby Borough Council (2019) has produced an adopted Local Plan which covers a number of policies relating to biodiversity and habitat conservation, including:

- **Policy NE1: Protecting Designated Biodiversity and Geodiversity Assets**: The Council will protect designated areas and species of international, national and local importance for biodiversity and geodiversity as set out below. Development will be expected to deliver a net gain in biodiversity and be in accordance with the mitigation hierarchy below. Planning permission will be refused if significant harm resulting from development affecting biodiversity cannot be: a) Avoided, and where this is not possible; b) Mitigated, and if it cannot be fully mitigated, as a last resort; c) Compensated for.
- **Policy NE3: Landscape Protection and Enhancement**: New development which positively contributes to landscape character will be permitted. Development proposals will be required to demonstrate that they: a) Integrate landscape planning into the design of development at an early stage; b) Consider its landscape context, including the local distinctiveness of the different natural and historic landscapes and character, including tranquillity; … b) Aim to either

conserve, enhance or restore important landscape features in accordance with the latest local and national guidance;… and c) Address the importance of habitat biodiversity features, including aged and veteran trees, woodland and hedges and their contribution to landscape character, where possible enhancing and expanding these features through means such as buffering and reconnecting fragmented areas.

- **Policy SDC2: Landscaping**: The landscape aspects of a development proposal will be required to form an integral part of the overall design. A high standard of appropriate hard and soft landscaping will be required. All proposals should ensure that: a) Important site features have been identified for retention through a detailed site survey; b) Features of ecological, geological and archaeological significance are retained and protected and opportunities for enhancing these features are utilised (consideration will also be given to the requirements of policies NE1 and SDC3 where relevant);… c) New planting comprises native species which are of ecological value appropriate to the area; … d) Detailed arrangements are incorporated for the long-term management and maintenance of landscape features.

3. METHODOLOGIES

This Preliminary Ecological Appraisal has been undertaken in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Preliminary Ecological Appraisal, 2nd edition (CIEEM, 2017).

3.1. Desktop study

A data search was conducted for the Site and the surrounding area within 2km. The search was extended to 10km for internationally designated sites. Data was retrieved from the sources listed in Table 1.

Table 1: Sources of data for desktop study

Organisation	Data collected	Date collected
Multi-agency Geographic Information for the Countryside (MAGIC) www.magic.gov.uk	Information on local, national and international statutory protected areas.	06/05/2025
Warwickshire Biological Records Centre	Information on protected and notable sites and species within 2km of the Site (SP 38189 74818).	06/05/2025
Ordnance Survey maps and aerial photography	Information on habitats and connectivity between the Site and the surrounding landscape	06/05/2025
Plantlife Important Plant Areas Buglife Important Invertebrate Areas	Information on hotspots of diversity for plants and invertebrates and populations of internationally threatened species.	06/05/2025

3.2. UK Habitat Classification

Habitats were surveyed using the standardised UK Habitat classification and mapping methodology (UKHab Ltd, 2023). Data were recorded onto a Samsung Tablet in a Geographic Information System (GIS), in this instance QField, following a modified UK Habs colour mapping palette. Dominant plant species were observed and recorded within each habitat type. The plant species nomenclature follows that of Stace (2019).

The DAFOR scale is used to describe the relative abundance of species. The scale is shown in Table 2. It is important to note that where a species is described as rare this description refers to its relative abundance within the Site and is not a description of its abundance within the wider landscape.

Therefore, a species with a rare relative abundance within the Site may be common within the wider landscape.

Table 2: DAFOR scale

DAFOR code	Relative abundance
D	Dominant
A	Abundant
F	Frequent
O	Occasional
R	Rare

In order to assess grassland habitats a series of 1m by 1m quadrats are used to understand species composition. Within each quadrat the percentage cover of each species is recorded. The number of quadrats used varies depending on grassland complexity.

3.3. Protected and notable species scoping survey

As part of the Preliminary Ecological Appraisal, an assessment of the potential for the habitats on site, or within the zone of influence of the proposed development, to support protected or notable species was made. This assessment was based on the quality, extent and interconnectivity of suitable habitats, along with the results of the desktop study detailed in Section 3.1. This includes Species of Principal Importance as listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006), and Red and Amber listed Birds of Conservation Concern (BoCC) as per Stanbury *et al.*, 2021 (see Appendix 1).

Protected and notable species considered within the protected species scoping survey for Land off London Road, Ryton-on-Dunsmore include the following:

- Plants and fungi: bluebell *Hyacinthoides non-scripta*, red hemp-nettle *Galeopsis angustifolia* and corn buttercup *Ranunculus arvensis*.
- Invertebrates: brown hairstreak *Thecla betulae*, adonis ladybird *Hippodamia variegata* and purple emperor *Apatura iris*.
- Fish: European eel *Anguilla anguilla*, river lamprey *Lampetra fluviatilis*, brown trout *Salmo trutta subsp. fario*.
- Amphibians: Natterjack toad *Epidalea calamita*, great crested newt *Triturus cristatus* and common toad *Bufo bufo*.
- Reptiles: Adder *Vipera berus*, common lizard *Zootoca vivipara*, slow-worm *Anguis fragilis*, grass snake *Natrix helvetica helvetica*.

- Birds: With special reference to species listed under Schedule 1 of The Wildlife and Countryside Act, 1981, Species of Principal Importance and BoCC species.
- Mammals: Badger *Meles meles*, bats (all species), water vole *Arvicola amphibius*, otter *Lutra lutra*, hazel dormouse *Muscardinus avellanarius*, hedgehog *Erinaceus europaeus*, brown hare *Lepus europaeus*, harvest mouse *Micromys minutus*, polecat *Mustela putorius* and European beaver *Castor fiber*.

In each case the likelihood of presence of these protected species in the zone of influence of the proposed development was classified as being either confirmed, high, moderate, low or negligible.

- **Confirmed**: The species is confirmed during the Preliminary Ecological Appraisal, previous survey effort or recent records.
- **High:** Habitats are available which are highly suitable for this species and there are records within the desktop study. The surrounding areas also provide widespread opportunities for the species which are well connected to the Site.
- **Moderate:** Some suitable habitat available for the species although not of optimum quality. Species is present with the desktop study.
- **Low:** Some suitable habitat available for the species but this is low value and possibly of small scale or with poor connectivity. No, or very few, records returned in the desktop study.
- **Negligible**: No suitable habitat available for the species, or very little poor-quality habitat.

This protected species scoping survey is designed to assess the *potential* for presence or absence of a particular species or species group, and does not constitute a full survey for these species.

3.4. Surveyor, author and reviewer

The survey was undertaken by [redacted]

3.5. Date, time and weather conditions

See Table 3 below for details of the date, time and prevailing weather conditions recorded during the site visit for the Preliminary Ecological Appraisal.

Table 3: Date, time and weather conditions of survey visit

Date	Time of survey	Weather conditions*
06/05/2025	09:00	Wind: 1/8 Cloud: 5/8 Temp: 17°C Rain: None

*Wind as per Beaufort Scale / Cloud cover given in Oktas.

3.6. Constraints

A single visit cannot always ascertain the presence or absence of a protected species. However, an assessment is made of the likelihood for protected species to occur based on habitat characteristics and the ecology of each species. Where there is potential for protected species, additional survey work may be required to ascertain their presence or absence.

Data on species records obtained from local biological records centres are sometimes only available at low spatial resolutions and are constrained by the voluntary nature of the contributions and what has been chosen to be submitted as records. While these records provide a useful indication of species recorded in the local area, in particular protected or notable species, the data is not necessarily an accurate reflection of species assemblages or abundance in the vicinity.

The north-eastern fields containing grassland and mixed scrub and the woodland in the south-eastern corner could not be accessed due to fencing. These areas were surveyed from vantage points and species list were created based on what could be seen from the vantage point. The fields were heavily managed as horse grazing land, with stables and play equipment present, and therefore the access constraints are not considered to have a significant impact on the result of this survey. Similarly, the species composition and make up of the woodland was visible from the vantage point to the west. This area could not be checked for signs of notable or protected species. Subsequent surveys should access this area if possible. Under current proposals, this area is largely retained.

4. RESULTS

4.1. Desktop study

An ecological desktop study was completed for the Site and the surrounding 2km. Data provided by Warwickshire Biological Records Centre identified numerous UK and European protected species, Species and Habitats of Principal Importance (as listed under Section 41 of the NERC Act 2006), and species of conservation concern within 2km of the Site. There are no internationally designated sites within 10km of the Site. It should be noted that this is not a comprehensive list of the distribution or extent of the local flora and fauna of conservation importance. These species records are discussed in greater detail in the protected species scoping survey section (Section 0 below).

Details of statutory designated sites identified as part of the desktop study are displayed in Table 4 below. These consist of five Sites of Special Scientific Interest (SSSI).

Table 4: Statutory designated sites within 2km of Land off London Road, Ryton-on-Dunsmore

Site name	Area (ha)	Distance and direction	Reasons for selection
Ryton and Brandon Gravel Pits SSSI	2.14	5m W	Ryton and Brandon Gravel Pits SSSI is designated for its geological importance and is beyond the scope of this report.
Brandon Marsh SSSI	24.92	130m N	A diverse complex of flooded gravel pits, fen and scrub can be found adjacent to the River Avon, with fen in particular being a rare habitat in the county. The site is the county stronghold for Cetti's warbler *Cettia cetti* and the reedbed is one of two regular sites in the county for overwintering bittern *Botaurus stellaris*.
Brandon Lane Verge SSSI	0.81	1.17km N	Road verge with semi-improved grassland and adjacent hedge. Species are generally ruderal, with some richer patches which include yarrow *Achillea millefolium*, black knapweed *Centaurea nigra* and wild carrot *Daucus carota*.
Ryton Wood SSSI	95.30	1.4km S	Ryton Wood is one of eight large and numerous smaller woods that together make up the greatest concentration of woodland in Warwickshire. The wood also has an extensive network of rides. The site is particularly important for a range of butterfly species, with records of

Site name	Area (ha)	Distance and direction	Reasons for selection
			dingy skipper *Erynnis tages*, grizzled skipper *Pyrgus malvae,* white admiral *Limenitis camilla* and purple hairstreak *Neozephyrus quercus.* The woodland is also a release site for small pearl-bordered fritillary, which became extinct in the county over 35 years ago. Over thirty nationally notable insects have been recorded, including a record for *Eristalis pratorum*, which remains the only known location in the country for this fly. The site is of great value for many species of bird, including all three species of woodpecker. Other notable species present within the wood include a variety of bats, amphibians and reptiles.
Herald Way Marsh SSSI	15.84	1.66km N	The site contains a range of wet communities which are scarce in the county. They range from open water through swamp and fen to marsh, as well areas of grassland, scrub and woodland. The site has been selected as a SSSI for its assemblage of invertebrates, a number of which are nationally rare. In drier areas there is an abundance of common spotted orchid *Dactylorhiza fuchsii* as well as southern marsh orchid *Dactylorhiza praetermissa.* A nationally restricted species of leaf beetle *Cryptocephalus aureoles* has been recorded from the site, as have a number of nationally rare insects including the cranefly *Nephrotoma crocata* and solitary bee *Andrena tibialis* and the fly *Phaonia atriceps.*

Details of non-statutory designated sites identified as part of the desktop study are displayed in Table 5 below. These consist of two Local Nature Reserves (LNR), 11 Local Wildlife Sites (LWS) and six Potential Local Wildlife Sites (pLWS).

Table 5: Non-statutory designated sites within 2km of Land off London Road, Ryton-on-Dunsmore

Site name	Area (ha)	Distance and direction	Reasons for selection
The Dell LNR	8.96	325m S	The site has a mosaic of habitats, including steep sandy banks, open grassland, scrub, willow carr, a pool with adjacent marshy areas, semi-improved grassland, a damp ditch hedgerow and woodland. As well as the intrinsic habitat value the site is also important for invertebrates (it has been surveyed for flies, bees, wasps, dragonflies and butterflies and includes five nationally scarce species and seven regionally important species.
Willenhall Wood and Meadow LWS, LNR	15.02	1.33km NW	Ancient woodland of ash *Fraxinus excelsior*, oak *Quercus robur,* birch *Betula pendula,* aspen *Populus tremula*, rowan *Sorbus aucuparia*, field maple *Acer campestre* and wild cherry *Prunus avium,* semi-improved grassland and a patch of scrub. The site is not only valuable for its botanical interest, but is of interest for birds and invertebrates, with at least five nationally scarce insects recorded.
Steetley and adjacent wet meadows south or Brandon Marsh LWS	15.37	5m N	A complex block of semi-improved grassland with woodland and a large waterbody, on the former gravel extraction site. Tormentil *Potentilla erecta*, marsh ragwort *Jacobaea aquatica* and heath speedwell *Veronica officinalis* were recorded on site. These species are listed as Near-threatened in A Vascular Plant Red List for England.
River Avon LWS	341.40	105m NW	The River Avon in SP37 is a varied section of river with a variety of features, with some stretches in an asymmetrical flood plain with steep banks on one bank. Features include eroding and stable earth cliffs, mid-point bars,

Site name	Area (ha)	Distance and direction	Reasons for selection
			islands, riffles and pools. Otter have been recorded on the River Avon in this area and appear to use the river and tributaries in the Brandon Marsh and Ryton area. The site includes the river and its banks as well as larger areas of flood plain. Water vole has also been recorded in the Brandon Marsh area.
Ryton pasture, pond, marsh and stream LWS	7.54	150m E	This site includes two fields of species rich, semi-improved grassland, some of which is on probable medieval ridge and furrow. There are a number of thick hedges bordering the area and a stream splits the site at the bottom of a steep sided valley. The site includes a flooded area of pond and marsh, of which the former is silting up.
Three pools at Ryton pLWS	31.23	610m S	A series of semi-improved grasslands of varying species richness, with old settling pools for the adjacent sand and gravel quarry. Also present is an area of marsh, willow carr and typha beds.
Black Spinney and Long Spinney Part LWS	18.02	850m S	Woodland with wet areas and pools along a stream valley.
Siskin Drive Bird Sanctuary LWS	20.45	1.03km W	One of the most important wildlife sites in the Coventry area, the site is important for plants, birds, mammals and invertebrates with a number of nationally scarce invertebrate species and birds of conservation concern recorded.
London to Birmingham Mainline Railway pLWS	8.01	1.3km N	The site consists of tall herbs and grasses dominated by nettle *Urtica dioica* and developing secondary woodland mainly consisting of hawthorn *Crataegus monogyna*. Other flora species include occasional great hairy willowherb
Area between Brandon Wood	21.25	1.38km N	Supports semi-improved grassland, tall ruderal and encroaching scrub and a pond.

Site name	Area (ha)	Distance and direction	Reasons for selection
and Piles Coppice LWS			
The Pools pLWS	2.51	1.40km N	Designated Ancient Woodland.
Rowley Lane pLWS	1.36	1.41km W	An avenue of ancient trees with associated dry ditches, remnant hedge, mature oak and ash. Adjoining is an area of young ash woodland, tall herb and scrub.
Brandon Wood LWS	63.84	1.45km NE	Designated as semi-natural ancient woodland, although much of the wood has been replanted with conifers. Butterfly species include white admiral, purple hairstreak and white letter-hairstreak. There are a number of ponds in the wood which are important for breeding dragonflies. Recent survey work has identified dormouse to be within the wood, one of only a handful of sites in Warwickshire.
The Coppice pLWS	8.49	1.50km SE	Ancient semi-natural oak *Quercus* sp. woodland with hazel *Corylus avellana* coppice. The ground flora contains bramble *Rubus fruticosus*, primrose Primula vulgaris, wood sorrel *Oxalis acetosella* and remote sedge *Carex remota*, with damper areas having water figwort *Scrophularia auriculata*.
Ryton Pools County LWS	53.86	1.58km S	A former quarry and landfill site, which now comprises meadows, plantations, pools and a stream and has a high species diversity. A large area of semi-improved grassland, which is located in the south, supports several rare/notable species, including heath speedwell *Veronica officinalis*, wild strawberry *Fragaria vesca*, tormentil and pennyroyal *Mentha pulegium*. Pagets Lane Pool is one of the most important sites for dragonflies in the county. It contains 17 species, of which 14 breed. Great crested newts and grass snakes have been recorded within the site.

Site name	Area (ha)	Distance and direction	Reasons for selection
Rock Farm Sludge Lagoons pLWS	156.81	1.60km SW	A complex site with a mosaic of wetland, pools, grassland, swamp, woodland and marshy grassland.
Piles coppice LWS	21.26	1.68km N	Ancient woodland with an adjacent area of semi-improved grassland. The woodland is particularly important due to stands of sessile oak *Quercus petraea* and small-leaved lime *Tilia cordata* coppiced stands, making it one of the most historically important woodlands in the Midlands. Lobster *Stauropus fagi* and orange footman *Eilema sororcula* moths which were considered extinct in Warwickshire were found here in 2018.

The Site is located in the village in the village of Ryton-on-Dunsmore, 5km south-east of Coventry. There are multiple Habitats of Principal Importance in proximity to the Site including lowland meadows, floodplain grazing marsh, good quality semi-improved grassland, lowland fens and ancient/semi-natural woodland. Brandon Marsh SSSI is located 130 north of the Site and is well connected to the Site via a network of woodland, ditches and scrub. Ryton and Brandon Gravel Pits SSSI is located immediately to the west of the Site, however this is designated for its geological interest and is beyond the scope of this report. River Avon and Tributaries LWS and The Dell LNR are also present, which support riparian and floodplain habitats, marshy areas and pools in the local area. The aquatic and riparian habitats are considered to be of significant local value, as well as associated wet grasslands. Ancient woodlands are also of significance. These habitats support important populations of many notable species, and particular birds and invertebrates.

There are three large ponds located within 200 metres. The A45 runs along the southern boundary, a residential lane runs along the eastern boundary and the north-eastern boundary of the Site comprises woodland and a sewage treatment works. The wider environment comprises commercial and residential areas associated with Coventry, Coventry airport, agricultural fields and patches of woodland. Hedgerows and corridors of greenspace connect isolated patches of woodland.

The Site does not lie within any Plantlife Important Plant Areas (IPAs) or Buglife Important Invertebrate Areas (IIAs).

The Site lies within Natural England SSSI Impact Risk Zones (Natural England, 2019). All planning applications within this Impact Risk Zone will require LPA consultation with Natural England regarding potential impacts upon these designated sites.

4.2. UK Habitat Classification

The Site was found to comprise other neutral grassland, modified grassland, other broadleaved woodland, mixed scrub, willow scrub, ditches, watercourses, a pond and native species-rich hedgerows. More detailed species lists, along with their relative abundance, can be found in Appendix 2. The UK habitat classification survey map is provided in Figure 1. Descriptions of the habitat types present along with dominant species compositions are provided below.

Other neutral grassland (g3c)

The majority of the Site comprises other neutral grassland spread across five fields. One field to the east of the Site is accessible via public footpaths and comprises dominant sweet vernal grass *Anthoxanthum odoratum*, red clover *Trifolium pratense* and bulbous buttercup *Ranunculus bulbosus* (Appendix 3, Photograph 3). The field margins have a higher species diversity with an average species count of 8.3 per m^2 and herbs including wood forget-me-not *Myosotis sylvatica*, bush vetch *Vicia sepium* and hop trefoil *Trifolium campestre* (Appendix 3, Photograph 4).

The remaining fields are not publicly accessible and comprise dominant sweet vernal grass, rare Yorkshire-fog *Holcus lanatus*, crested dog's tail *Cynosurus cristatus* and barren brome *Bromus sterilis L*. Herbs include common chickweed *Stellaria media*, common sorrel *Rumex acetosa,* hairy tare *Vicia hirsuta* and bulbous buttercup (Appendix 3, Photograph 5, Photograph 6). There are wetter depressions with locally abundant rush *Juncus* sp. These other fields do not have a distinct margin with greater diversity. Average species count is 6 per m^2 across the remaining fields.

The grassland fields all appear to be managed through regularly mowing, although not recently. The sward is uniform at a height of approximately 15cm.

A dry (at the time of survey) depression ran through the middle of the north-eastern modified grassland field. The diversity was greater here than the surrounding grassland with dominant sweet vernal grass, locally abundant soft rush *Juncus effusus* and cuckoo flower *Cardamine pratensis*, occasional willowherb sp. *Epilobium* and rare lesser celandine *Ficaria verna*, dock sp. *Rumex* and meadow buttercup *Ranunculus acris*. As such, this area is classified as other neutral grassland.

Patches of other neutral grassland is present in the south of the site, among an area of mixed scrub. Quadrats could not be taken due to access issues, but it assumed based on vantage point survey that the grassland is similar in composition to the adjacent fields.

Modified grassland (g4)

In the north-east of the Site, there is a field of modified grassland dominated by fescue sp., which is currently used as a horse paddock and play space (Appendix 3, Photograph 7).

The field in the west of the site is an area of rough grassland that is likely to be infrequently horse grazed, comprising dominant sweet vernal grass and crested dog's-tail as well as rare meadow buttercup, red clover and lesser hawkbit *Leontodon saxatilis Lam*. Scattered hawthorn and gorse scrub were present.

Mixed scrub (h3h)

Belts of mixed scrub associated with ditches are present across the Site, comprising dominant goat willow *Salix caprea*, occasional ash oak blackthorn *Prunus spinosa* and hawthorn and rare gorse (Appendix 3, Photograph 8). In the south-west of the Site, the mixed scrub is dominated by goat willow and oak (Appendix 3, Photograph 9).

A patch mixed scrub is present in the south of the site. A full species list could not be taken due to access issues, but it assumed based on vantage point survey there is dominant goat willow and oak present.

Willow scrub (h3j)

A small patch of willow scrub comprising dominant immature goat willow and a ground layer of creeping buttercup *Ranunculus repens* L, creeping thistle *Cirsium arvense* and lesser pond-sedge *Carex acutiformis* (Appendix 3, Photograph 10) is present in the west of the site. This area was either recently planted or allowed to develop as individuals were uniformly young.

Other broadleaved woodland (w1g)

A woodland belt running east-west towards the centre of the site comprises dominant blackthorn, with occasional hawthorn, bramble Rubus fruticosus and greater stitchwort Stellaria holostea (Appendix 3, Photograph 11).

There is a woodland belt running north-south through the Site comprising abundant hawthorn, frequent field maple *Acer campestre*, ash and alder *Alnus glutinosa* and rare hazel *Corylus avellana*, rowan *Sorbus aucuparia*, holly *Ilex aquifolium* and yew *Taxus baccata* (Appendix 3, Photograph 12).

The woodland belt running along the embankment to the north of the A45 is woodland is listed on the priority habitat inventory as deciduous woodland. However, the habitat is not of sufficient quality to align with the lowland mixed deciduous woodland priority habitat type. The woodland was planted/developed on the embankment constructed as part of the A45 to the south. The diversity of this woodland is low, being dominated by silver birch *Betula pendula*, with abundant willow (primarily around the dry ditch), hawthorn *Crataegus monogyna* and ash *Fraxinus excelsior*, with occasional oak *Quercus robur*. The

ground flora was limited to abundant bramble and grass, occasional cleavers *Galium aparine*, gorse *Ulex europaeus*, ferns and rare germander speedwell *Veronica chamaedrys*, ground ivy *Glechoma hederacea* and forget-me-not sp *Myosotis sp.* The trees were of uniform age (typically semi-mature), with some seedlings showing evidence of regeneration.

The watercourse channel and associated bank in the west of the Site is surrounded by woodland comprising dominant willow species, aspen *Populus tremula* and silver birch (Appendix 3, Photograph 13). The channel is deep sided, with willow growing within the channel and on the banks. The land sloped up the west to the west of the watercourse.

In the south of the Site there is a woodland comprising dominant non-native oak, with rare alder, hawthorn and ash saplings (Appendix 3, Photograph 14).

Native hedgerow with trees (h2a6)

A native hedgerow with trees comprising dominant Persian ivy *Hedera colchica*, frequent hawthorn and rare ash, alder and holly is present in the east of the Site (Appendix 3, Photograph 15).

Species-rich native hedgerow with trees associated with a bank or ditch (h2a5)

In the north of the Site a hedgerow comprising frequent blackthorn, hawthorn and large mature oaks is present (Appendix 3, Photograph 16)

Other standing water (r1g)

There is a pond in the west of the Site, connected to a slow-moving watercourse channel Appendix 3, **Photograph 17**).

Other rivers and streams (r2b)

A watercourse channel is present along the eastern boundary of the Site and running north-south through the centre of the Site. The water is slow-moving and less than 30cm deep at most points (Appendix 3, Photograph 18).

A watercourse is present running to the north of the pond. This was a deep sided channel (approx. 2m), with willows silver birches growing within it. The water was very shallow at the time of survey. A dry channel is present to the south-east of the pond, however, this was dry at the time of survey.

Canal or ditch (r1e)

A network of canals is present, which appear to be seasonally wet. At the time of the survey the ditches were dry (Appendix 3,
Photograph 19).

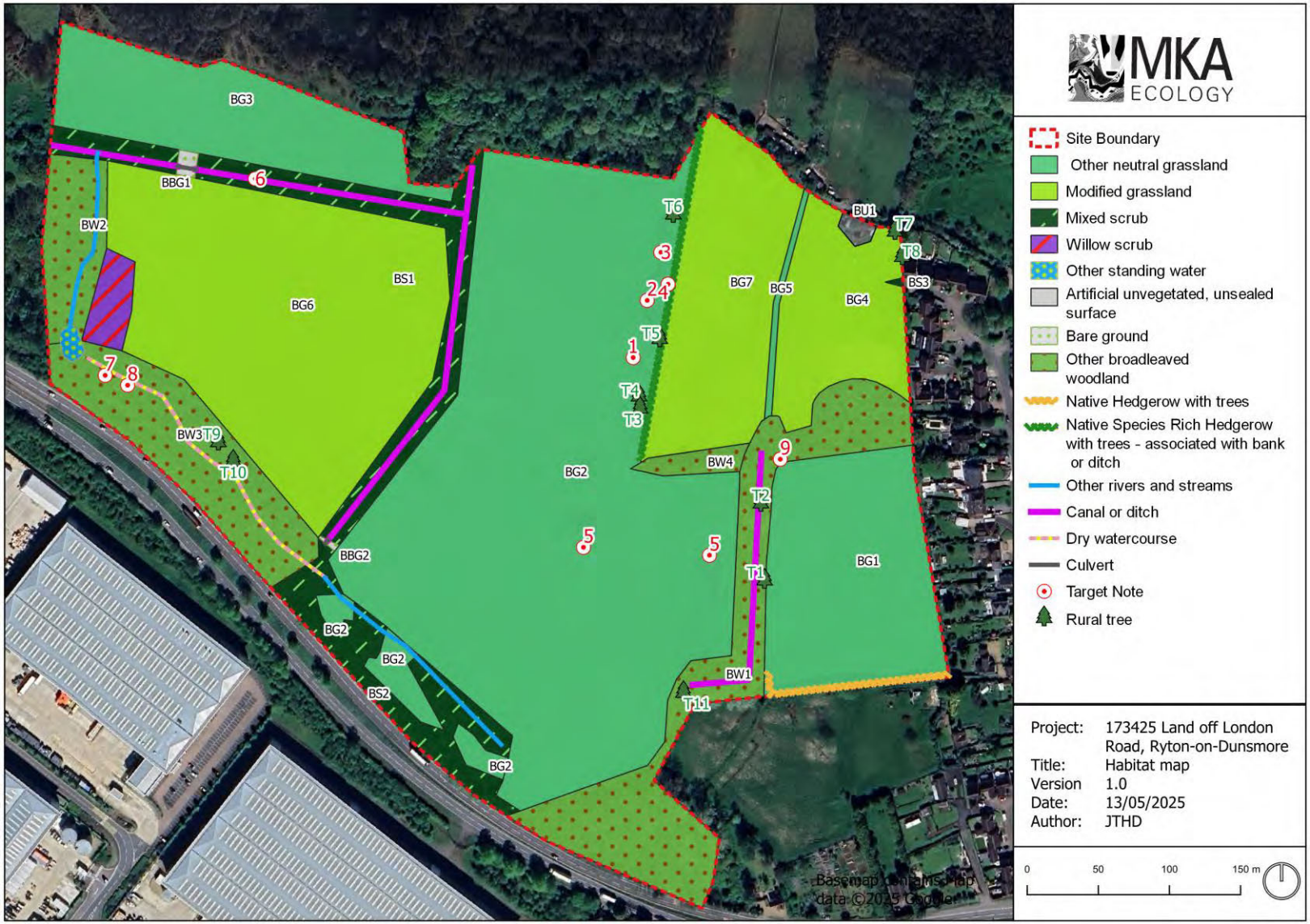
Individual tree

A mature pedunculate oak is present in the north-east corner of the site. An owl box is present approximately 3-4m off the ground.

Bare ground

Two small areas of bare ground are present where there are accessways between fields. A third area of bare ground is present in the north-east corner where several sheds are present that are used to stable horses.

Figure 1: UK Habitat Classification map of Land off London Road, Ryton-on-Dunsmore



Target notes for Figure 1:

Target note	Description
1	Mammal digging, likely rabbit as dropping are present (Appendix 3, Photograph 20)
2	Mammal push under the fence (Appendix 3, Photograph 21)
3	Badger latrine (Appendix 3, Photograph 1)
4	Potential badger sett, however the holes are filled with leaf litter and do not look recently used (Appendix 3, Photograph 2)
5	Two wet depressions where rush species dominate (Appendix 3, Photograph 24)
6	Mammal burrows in the side of a bank (Appendix 3, Photograph 25)
7	Badger sett entrance and mammal path (Appendix 3, Photograph 26)
8	Badger sett entrance and mammal path (Appendix 3, Photograph 27)

4.3. Protected species scoping survey

Plants and fungi

The data search returned records of one species listed on Schedule 8 of the Wildlife and Countryside Act (1981), bluebell, as well as ten species listed under Section 41 of the NERC Act 2006, including red hemp-nettle and corn buttercup within 2km of the Site.

Non-native bluebell was identified onsite during the survey, primarily adjacent to gardens in the field margin in the east of the Site. The grassland onsite is generally species poor with <10 species per m^2, comprising common and widespread species such as creeping, bulbous and meadow buttercup and *Plantago* species. The woodland and scrub onsite did not support a notable ground flora, with as much being retained as possible. The likelihood of protected or notable species being present in the construction footprint is **negligible**. This species group is not considered further within this report.

Invertebrates

The data search returned numerous records of notable invertebrates within the search area, including those listed under Section 41 of the NERC Act 2006 and Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), including brown hairstreak, adonis ladybird and purple emperor.

The neutral grassland, woodland, hedgerow and scrub present provide limited opportunities for a range of pollinating invertebrates. However, due to the presence of higher quality foraging habitats in

proximity, it is considered that the likelihood of the Site supporting an assemblage of protected or notable invertebrate species is **low.**

Fish

The data search returned no records of protected and notable fish species within 2km of the site. The ditches and watercourses onsite appear to either be seasonally wet or very shallow and therefore the likelihood of fish being present is considered to be **negligible**. This species group is not considered further within this report.

Amphibians

The data search returned 50 records of common frog *Rana temporaria*, 56 records of common toad, 49 records of great crested newt and 72 records of smooth newt *Lissotriton vulgaris* within 2km of the Site. The closet record of great crested newt originates from grid reference SP3875from 2008. There are three large ponds within 200m which are connected to the Site via woodland, scrub and grassland. There is a fourth pond within 500m, however the River Avon presents a significant barrier to amphibian movement. The A45 provides a significant barrier to amphibian movement onto the Site from the south. A search of Defra's MAGIC website returned no European Protected Species Licences granted for great crested newt within 2km of the Site.

The grassland, scrub and woodland onsite provide suitable terrestrial habitat for amphibians and a pond and network of seasonally wet ditches is present. Overall, the likelihood of great crested newt being present onsite is considered to be **high**.

Reptiles

The data search returned 105 records of grass snake and one record of slow-worm within 2km of the Site. The tussocky field margins, scrub, ditches and woodland provide suitable habitats for reptiles, and the nearby watercourses and floodplains may be of particular value to grass snake, a species associated with wetlands. Overall, the likelihood of reptiles being present is **high**.

Birds

15 species were recorded during the site visit. These species are shown in Table 6 together with their conservation status. It is important to note that this is not a full inventory of species for the site.

Table 6: Bird species recorded during site visit at Land off London Road, Ryton-on-Dunsmore

Common name	Systematic name	S1 W&CA[1]	BoCC[2] Status	S41 SPI[3]
Cuckoo	*Cuculus canorus*	-	Red	Yes
Woodpigeon	*Columba palumbus*	-	Amber	-
Red kite	*Milvus milvus*	Yes	Green	-

Common name	Systematic name	S1 W&CA[1]	BoCC[2] Status	S41 SPI[3]
Woodpecker sp.	*N/A*	-	-	-
Rook	*Corvus frugilegus*	-	Amber	-
Blue tit	*Cyanistes caeruleus*	-	Green	-
Great tit	*Parus major*	-	Green	-
Blackcap	*Sylvia atricapilla*	-	Green	-
Chiffchaff	*Phylloscopus collybita*	-	Green	-
Wren	*Troglodytes troglodytes*	-	Amber	-
Blackbird	*Turdus merula*	-	Green	-
Robin	*Erithacus rubecula*	-	Green	-
Greenfinch	*Chloris chloris*	-	Red	-
Goldfinch	*Carduelis carduelis*	-	Green	-
Chaffinch	*Fringilla coelebs*	-	Green	-

[1] Schedule 1 of The Wildlife and Countryside Act 1981 (see Appendix 1)
[2] Birds of Conservation Concern (see Appendix 1)
[3] Section 41 (NERC Act 2006) 'Species of Principal Importance' (see Appendix 1)

The data search returned records of species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), including avocet *Recurvirostra avosetta,* Cetti's warbler and barn owl *Tyto alba*. The majority of protected and notable bird species recorded within 2km of the Site originate from Brandon Marsh SSSI (130 metres north of the Site) and are associated with wetland habitats, however there is no suitable onsite for wetland birds. Red kite was identified during the survey in flight and a cuckoo was heard calling in the distance. There are large mature trees present in the hedgerows and woodland edges which are suable to support roosting bats and the watercourses may support foraging kingfisher. Overall, the risk of protected bird species being present is considered to be **moderate.**

The habitats onsite provide suitable nesting habitat for common and widespread species, as well as notable species such as dunnock *Prunella modularis*, an BoCC Amber-listed species, which was recorded during the site visit. There is a **high** likelihood of nesting birds being present during the breeding season, however the risk of the Site supporting a notable assemblage is **moderate**.

Bats

The data search returned records of at least nine species of bat within 2km of the Site (brown long-eared bat *Plecotus auritus*, common pipistrelle *Pipistrellus pipistrellus*, Daubenton's bat *Myotis daubentonii*, Nathusius's pipistrelle *Pipistrellus nathusii*, Natterer's bat *Myotis nattereri*, soprano

pipistrelle *Pipistrellus pygmaeus*, noctule *Nyctalus noctule,* serotine *Eptesicus serotinus,* and whiskered bat *Myotis mystacinus*).

A search of Defra's MAGIC website returned no European Protected Species Licences granted 2km of the Site

Eleven trees were identified as possibly having features with the potential to support roosting bats. There are a number of mature trees present in the hedgerows and woodland and therefore, the Site is assessed as having **high** potential to support roosting bats.

The corridors of scrub and woodland onsite form strong linear features which may be utilised by commuting bats, potentially linking roosting features onsite to greenspace in the wider landscape. In addition, the woodland, grassland and wetland in proximity to the Site all provide suitable foraging habitats. Therefore, the Site is assessed as having **moderate** suitability to support a notable commuting route for bats and the likelihood of the Site supporting a notable foraging site is considered to be **moderate**.

Badgers

The data search retuned eight records of badger within 2km of the Site. This includes five records of badger setts and three causal badger records. The areas of woodland, grassland and scrub onsite provide suitable foraging and sett building habitat. Two badger holes, a latrine and numerous mammal paths were recorded during the site visit. Therefore, the presence of badgers onsite is **confirmed**.

Otter

The data search returned 67 records of otter within 2km of the Site. The majority of records for otter originate from Brandon Marsh SSSI. There are no suitable habitats present for otter and therefore the likelihood of otter being present onsite considered to be is **negligible**. This species is not considered further in this report.

Hazel dormouse

Brandon Wood LWS, located 1.4km north-east of the Site, is described as supporting suitable habitats for hazel dormouse and individuals have been identified in this woodland previously. The scrub and woodland belts onsite may provide suitable habitat for hazel dormouse and the likelihood of the species being present onsite is considered to be **low.**

Brown hare, water vole and harvest mouse

The data search returned six records of brown hare, and 18 records of water vole and 15 records of harvest mouse within 2km of the search area. The majority of records for water vole originate from Brandon Marsh SSSI. There is no suitable habitat onsite to support these species and the likelihood of

brown hare, water vole or harvest mouse being present onsite is considered **negligible**. These species are not considered further in this report.

5. ECOLOGICAL CONSTRAINTS, OPPORTUNITIES AND RECOMMENDATIONS

This section outlines key ecological issues for consideration, recommendations for further work and ecological enhancements where appropriate. As this report is to support an application for inclusion of the Site in the Local Plan as part of a call for sites, there is no requirement at this stage to progress with these recommendations. However, they will require consideration should a planning application be submitted.

Off-site habitats (designated sites)

There are five Sites of Special Scientific Interest (SSSI), two Local Nature Reserves (LNR), 11 Local Wildlife Sites (LWS) and six Potential Local Wildlife Sites (pLWS) within 2km of the Site. Tributaries of the River Avon, included within the LWS designation are present onsite. These watercourses must be retained, protected, buffered and enhanced. The closest SSSI is Brandon Marsh SSSI, located 130m north of the Site. A Designated Sites Assessment is being produced alongside the Preliminary Ecological Assessment to assess the potential impacts of the proposed development on designated sites with 2km in line with Local Policy NE1.

Recommendation 1

Retain, protect, buffer and enhance designated sites onsite and in proximity.

Recommendation 2

Produce a Designated Sites Assessment which assesses the risk of impact of the proposed development on nearby designated sites.

On-site habitats

The species-rich native hedgerows, a Habitats of Principal Importance (NERC Act 2006), is present and should be retained within the site design, where feasible, and protected during construction in line with Local Policy NE2. These measures should be detailed within a Construction Ecological Management Plan (CEMP).

Recommendation 3

Retain and protect the woodland and hedgerows onsite as detailed within a CEMP.

Invertebrates

The neutral grassland, woodland, hedgerow and scrub present provide limited opportunities for a range of pollinating invertebrates. It is recommended that an Invertebrate Scoping Assessment is undertaken

at the Site to determine the site's suitability to support protected invertebrates and determine the requirement for further survey, if necessary.

Recommendation 4
Undertake an Invertebrate Scoping Assessment.

Amphibians
The grassland, scrub and woodland onsite provide suitable terrestrial habitat for amphibians and a pond and a network of seasonally wet ditches are present.

Great crested newts are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of the Conservation of Habitats and Species Regulations 2017; (see Appendix 1).

An eDNA survey of all ponds within 500m of the red line boundary is recommended to determine the likelihood of great crested newt being present on site. eDNA surveys involve a fast and cost-effective method of determining great crested newt presence or absence in a waterbody by analysing water samples for newt DNA. eDNA surveys must be undertaken between 15 April and 30 June. If great crested newt are confirmed, and impacts are anticipated, a Natural England Protected Species licence will be required.

Recommendation 5
Carry out eDNA surveys on all waterbodies within 500m of the Site. eDNA surveys must be carried out between 15 April and 30 June.

Amphibians naturally proceed along any vertical barrier they meet. In the context of a road, this is where the kerb line meets the road surface. When they reach a gully, many fall in and subsequently die of starvation. Inclusion of Wildlife Kerbs next to roadside gullies will allow amphibians to safely pass via a bypass recess in the front face of the kerb.

Recommendation 6
Include wildlife kerbs on new acess roads to allow amphibians to safely bypass roadside gullies.

Reptiles
The tussocky field margins, scrub, ditches and woodland provide suitable habitats for reptiles, and the nearby streams and floodplains may be of particular value to grass snake, a species associated with wetlands.

All UK reptile species are protected under Schedule 5 of the Wildlife & Countryside Act (1981), and are listed as Species of Principal Importance under the NERC Act (2006). It is an offence to intentionally kill or injure individuals of these species (see Appendix 1 for more information).

As the proposal is likely to result in the removal of suitable reptile habitat, additional survey work is recommended in order to determine the presence or absence of reptiles and establish any potential impacts the proposal may have on these species. These surveys should be carried out using artificial cover objects (on or under which reptiles can bask) in the active season which runs from March to October. The optimum survey times are in April, May and September. Seven visits should be conducted during suitable weather conditions according to guidance published by Froglife (1999).

Recommendation 7
Complete a reptile presence/ absence survey between April and September.

Birds
The fields, hedgerows, woodland, mixed scrub, mature trees and adjacent wetland provide suitable habitat for breeding birds. There is potential for important assemblages of farmland birds to occur within the site boundary, including priority species, and these may be impacted by the development proposals. In order to gain an understanding of usage of the Site by notable bird species such as skylark *Alauda arvensis*, cuckoo and red kite it is recommended that a suite of further bird surveys is undertaken.

It is recommended that a breeding bird survey is carried out at the Site following the Bird Survey Guidelines (Bird Survey & Assessment Group, 2023). This will encompass six visits over the breeding bird season (March to August) in order to identify the bird species that are using the site for breeding and whether any further mitigation will be necessary.

Recommendation 8
Undertake a breeding bird survey to assess the bird assemblages present and inform any mitigation measures required.

All wild birds, their active nests and eggs are protected under The Wildlife and Countryside Act 1981 (as amended), which makes it an offence deliberately, or recklessly, to kill or injure any wild bird or damage or destroy any active birds' nest or eggs.

Scheduling vegetation removal works between the months of September and February inclusive (i.e. outside of the bird season) would avoid impacts on breeding birds.

Where vegetation clearance works are required during the breeding bird season (between the months of March and August inclusive), such works can only proceed following the completion of a nesting bird check undertaken by an experienced ornithologist. Any active birds' nest identified during this check

must be protected from harm until the nesting attempt is complete. This will require a buffer to be left around the nest, the size of which will depend upon the species involved (as a general rule, this will be 10m in all directions around the nest). Any buffers established as a result of the initial nesting bird check must be subjected to a second check after the original nesting attempt is completed, before such areas can be removed during the breeding bird season.

Recommendation 9

Schedule vegetation and building clearance works between the months of September and February inclusive to avoid impacts on breeding birds. Where this timing is not feasible works should be preceded by a nesting bird check.

It is strongly recommended that any potential nesting bird habitat is cleared outside the breeding bird season in order to avoid potentially lengthy delays if nests are found during nesting bird checks.

Roosting bats

A total of 11 trees were identified as possibly having features with the potential to support roosting bats present in the hedgerows and woodland.

All bat species are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of Conservation of Habitats and Species Regulations 2017 (as amended). Bats are also Species of Principal Importance listed on Section 41 of the NERC Act (2006).

It is an offence to deliberately disturb a bat, damage or destroy a bat roost, intentionally or recklessly disturb a bat at a roost, or obstruct access to a roost.

It is recommended that a Ground Level Tree Assessment is undertaken to classify the potential of trees onsite to support roosting bats, based on potential roost features present.

Recommendation 10

Undertake a Ground Level Tree Assessment of the trees onsite for potential bat roost features.

Foraging and commuting bats

The hedgerows, woodland, mixed scrub grassland and adjacent wetland are likely to be used by foraging and commuting bats. Removal of key areas of commuting and/ or foraging habitat is likely to cause disturbance and will negatively impact on this species.

As such, it is recommended that further night-time bat walkover surveys (NBWS) and static monitoring surveys are completed at Land off London Road, Ryton-on-Dunsmore in accordance to the methodology stated within the Bat Conservation Trust's Good Practice Guidelines for high potential

sites (Collins, 2023). Sites with high foraging and commuting potential should complete one NBWS per season (spring – April/May, summer – June/July/August, autumn – September/October). This should be combined with static bat detector monitoring undertaken for a minimum of five consecutive nights per month (April to October).

Recommendation 11

Complete a suite of night-time bat walkover surveys and static detector monitoring surveys to identify the species utilising the Site and key foraging areas and commuting routes. These surveys should be completed in accordance with the methodology set out within the Bat Conservation Trust's Good Practice Guidelines (Collins, 2023).

Bat roosting behaviour, commuting and foraging activity can additionally be dramatically affected by artificial lighting (ILP, 2023). It is strongly recommended that any proposed exterior lighting on the new buildings/access roads is designed and managed appropriately to ensure that the area remains suitable for foraging bats. A sensitive lighting scheme should be developed to allow suitable roosting and foraging areas for bats. In particular, the woodland, mixed scrub and hedgerows should remain unlit. The sensitive lighting strategy should be developed following the guidelines set out in the BCT Guidance Note 08/18 (ILP, 2023). These measures should be secured through a planning condition.

Recommendation 12

Light pollution from any lighting should be minimised both during and after the construction phase. A sensitive lighting scheme should be developed and secured through a planning condition to allow for suitable roosting and foraging areas for bats within the site.

Badgers

Recent signs of badger using the Site including a latrine, holes with fresh spoil and mammal pathways and foraging signs were noted throughout the onsite grassland and woodland. Suitable foraging and sett building habitats are present throughout the Site.

Impacts on badgers are possible through disturbance from vegetation clearance and construction activities. Badger setts and badgers occupying a sett are protected under the Protection of Badgers Act 1992.

Further survey for badger is recommended to inform any mitigation or licensing measures required. Badger survey can be conducted at any time of year but the optimal time periods are February to April inclusive and September to October inclusive.

Recommendation 13

Undertake a badger survey between February to April inclusive and September to October inclusive.

Hazel dormouse

Brandon Wood LWS, located 1.4km north-east of the Site, is described as supporting suitable habitats for hazel dormouse and individuals have been identified in this woodland previously. The scrub and woodland belts onsite may provide suitable habitat for hazel dormouse. It is recommended to undertake a Habitat Suitability Assessment at the Site for hazel dormouse, which will then determine the requirement for presence/absence surveys, if necessary.

Recommendation 14

Undertake a hazel dormouse Habitat Suitability Assessment.

Other mammals

The installation of boundary fences can impact on hedgehogs through loss of habitat connectivity. At least one 13cm x 13cm hole should be installed at the bottom of each boundary fence, in order to maintain connectivity for hedgehogs. These 'hedgehog highways' (PTES, 2018) should have appropriate signage installed to indicate their purpose and stipulate that they should remain open.

Recommendation 15

Maintain habitat connectivity for hedgehog through the installation of at least one 13cm x 13cm hole at the bottom of each boundary fence (with a focus on fences separating residential gardens, and excluding fences adjacent to roads). These should be accompanied with appropriate signage indicating their purpose and stipulating that they should remain open.

Ecological Impact Assessment

Upon completion of the baseline surveys and finalisation of the site design, it is recommended an Ecological Impact Assessment is completed. The purpose of the EcIA will be to identify, quantify and evaluate the ecological impacts of the development and should be submitted to support the planning application.

Recommendation 16

Upon finalisation of the site design, complete an Ecological Impact Assessment to support the planning application.

Construction Ecological Management Plan

In order to ensure there are no impacts to important habitats and species during the proposed works, it is recommended that a Construction Ecological Management Plan is produced. This will cover activities relating to the construction/works period of the project and will detail how potential impacts to these features will be minimised and avoided.

Recommendation 17

Produce a Construction Ecological Management Plan to detail the protection and avoidance of protected sites, habitats and species during site works.

Opportunities for biodiversity enhancement

Following the issue of the National Planning Policy Framework (NPPF; see Appendix 1), all planning decisions should aim to maintain and enhance, restore or add to biodiversity and geological conservation interests. Ecological enhancements should aim to deliver biodiversity gains for the proposed development site. In line with the requirements of the Environment Act (2021), a Biodiversity Net Gain assessment will be completed to inform the site design and ensure the development delivers a minimum of 10% net gain. This should be followed by the production of a Habitat Management and Monitoring Plan (HMMP).

Recommendation 18

A Biodiversity Net Gain assessment and HMMP should be completed to support the development application and ensure measurable gains are delivered.

Planting of native species or those with a known attraction or benefit to local wildlife is recommended in landscape proposals. This will help to increase native plant species diversity, provide more ecologically valuable habitats, and result in a greater diversity of other dependent taxonomic groups. Habitat creation could include species-rich wildflower meadows, ponds and wetlands and new woodland and hedgerow planting. Brandon Marsh SSSI and River Avon and Tributaries LWS contain wetland habitat, which supports a range of species including overwintering birds, otter, water vole and rare invertebrates. The site offers potential for creating habitat for key local species, such as reedbed for bittern, wet scrubby habitat for Cetti's warbler, and mosaic habitats for invertebrates including brown hairstreak and adonis ladybird. Enhancing the quality of ditches and water channels onsite would improve suitability for water vole.

Recommendation 19

It is recommended that native British species are incorporated within the planting scheme for the final landscaping design in order to enhance the overall value of the site for biodiversity, in line with the requirements of the NPPF.

The creation of deadwood features at the site will be particularly valuable for invertebrates as a foraging resource, which in turn benefits a range of other species such as hedgehogs and reptiles. This could include rotting roots or tree stumps spread around various locations. The drilling of holes or cutting of notches can add even more value for invertebrates.

Recommendation 20

Incorporate simple biodiversity enhancement measures at the site, including the provision of deadwood features.

Enhanced opportunities for breeding birds should be incorporated into the design scheme. Bird boxes should be mounted on trees, fences and built structures at the site. Recommendations for species-specific box provision will be made following further breeding bird surveys.

The wider landscape has the potential for use by foraging bats. With this in mind, enhanced opportunities for roosting bats should also be provided at the site through installation of bat boxes. Recommendations for these will be made following the recommended activity surveys.

Recommendation 21

Provisions should be made for breeding birds and roosting bats at the site post-development, with details to follow the further survey effort.

Summary of recommendations

Table 7 below summarises the recommendations made within this report, and specifies the stage of the development at which action is required. Colour coding of cells within the table underneath. Table 8 and Table 9 summarise the further ecological surveys and assessments recommended, respectively.

Table 7: Summary of recommendations at Land off London Road, Ryton-on-Dunsmore

Species	Pre-planning action required?	Pre-construction action required?	Construction phase mitigation required?	Enhancements proposed?
Off-site habitats (designated sites)	Designated Sites Assessment. Watercourses must be retained, protected, buffered and enhanced.	TBC	TBC	TBC
Habitats	Biodiversity Net Gain (BNG) Assessment. Retain and protect key habitats.	Production of an HMMP	Retain and protect hedgerows and woodland using CEMP.	Native planting.
Invertebrates	Invertebrate Scoping Assessment	TBC	TBC	Native planting.
Amphibians	eDNA survey	TBC	TBC	Native planting.
Reptiles	Seven visit presence/ absence survey	TBC	TBC	TBC
Bats	Ground Level Tree Assessment and Night-Time Bat Walkover.	TBC	TBC	Bat boxes and native planting.

Species	Pre-planning action required?	Pre-construction action required?	Construction phase mitigation required?	Enhancements proposed?
Birds	Breeding bird survey.	TBC	Timing of works for vegetation removal OR further survey work Incorporate integrated bird boxes into new buildings.	Bird boxes and native planting.
Badgers	Badger survey	TBC	TBC	TBC
Hazel dormouse	Habitat Suitability Assessment	TBC	TBC	TBC

Key:

No action required for this species group at this stage

Action required (see notes for details)

Level of action required will be determined following the further survey work

Table 8: Summary of further surveys recommended Land off London Road, Ryton-on-Dunsmore

Species/species group	Purpose of survey	Survey period (inclusive unless otherwise stated)
Invertebrates scoping survey	Habitat Suitability Assessment	April-September
Great crested newt	Confirm presence/absence	15 April- 30 June
Reptiles	Confirm presence/absence	Apr, May, Sep

Species/species group	Purpose of survey	Survey period (inclusive unless otherwise stated)
Bats (activity transects)	Understand species assemblages and identify key foraging areas or commuting routes	April-Oct
Bats (daytime roost inspection)	Assess potential features for roosting bats	Jan-Dec
Birds (all species)	A Common Bird Census assesses the assemblage of nesting birds present.	Mar-Jul
Badger	Increase understanding of habitat use at the Site	Feb-Apr, Sep-Oct
Hazel dormouse	Habitat Suitability Assessment	Jan-Dec

Table 9: Summary of further assessments recommended Land off London Road, Ryton-on-Dunsmore

Assessment	Timing
Designated Sites Assessment	Pre-planning
Ecological Impact Assessment	Post completion of further ecology surveys
Biodiversity Net Gain assessment	Pre-planning
Habitat Management and Monitoring Plan	Either pre-planning or as part of condition discharge.
Construction Ecological Management Plan	Either pre-planning or as part of condition discharge.

6. CONCLUSIONS

The Preliminary Ecological Appraisal undertaken at Land off London Road, Ryton-on-Dunsmore found the Site to comprise other neutral grassland, modified grassland, woodland, mixed scrub, willow scrub, ditches, watercourses, a pond and native species-rich hedgerows. The proposed development is for an industrial/ commercial development, with the concept masterplan (TARMAC, 2024) comprising four larger scale and three smaller scale industrial units with associated access road and parking. A new park and open space for residents is proposed in the east of the development.

The Site lies in proximity five Sites of Special Scientific Interest, two Local Nature Reserves, 11 Local Wildlife Sites and six Potential Local Wildlife Sites. Tributaries of the River Avon, included within the LWS designation are present onsite. These watercourses must be retained, protected, buffered and enhanced. It is recommended to produce a Designated Sites Assessment to fully understand the sensitivities of the designated sites and ensure no adverse impacts occur.

The habitats present onsite have the potential to support several protected and notable species, and further survey work has been recommended for invertebrates, great crested newt, reptiles, bats, breeding birds, badger and hazel dormouse. Sensitive timing of works has also been recommended to avoid direct impacts on nesting birds during construction. Upon completion of the baseline surveys and finalisation of the site design, it is recommended an Ecological Impact Assessment is completed and a Construction Ecological Management Plan is produced.

Protected species constraints, whilst they might need some management, are unlikely to preclude development. Proximity to local designated sites will require consideration and potential design measures to limit impacts. Produce a Construction Ecological Management Plan to detail the protection and avoidance of protected sites, habitats and species during site works.

In line with the Environment Act (2021), the development must deliver a minimum of 10% net gain in biodiversity, assessed using the Defra statutory metric. Development at the Site provides an opportunity for biodiversity enhancement. The site offers potential for creating habitat for key local species, such as reedbed for bittern, wet scrubby habitat for Cetti's warbler, and mosaic habitats for invertebrates including brown hairstreak and adonis ladybird. Habitat creation could also include species-rich wildflower meadows, ponds and wetlands and new woodland and hedgerow planting. The management of these interventions will be detailed in a Habitat Management and Monitoring Plan. Recommendations for bird and bat provisions will be provided following the recommended survey effort. It is anticipated these measures will serve to deliver local and national priority habitats, helping to secure biodiversity gains and ultimately a sustainable development.

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8. APPENDICES

8.1. Appendix 1: Relevant wildlife legislation and planning policy

Please note that the following is not an exhaustive list, and is solely intended to cover the most relevant legislation pertaining to species commonly associated with development sites.

Subject	Legislation (England)	Relevant prohibited actions
Amphibians		
Great crested newt *Triturus cristatus* Natterjack toad *Epidalea calamita*	Schedule 2 of Conservation of Habitats and Species Regulations (2017) Schedule 5 of The Wildlife and Countryside Act 1981 (as amended)	• Deliberately capture or kill, or intentionally injure; • Deliberately disturb or recklessly disturb them in a place used for shelter or protection; • Damage or destroy a breeding site or resting place; • Intentionally or recklessly damage, destroy or obstruct access to a place used for shelter or protection; and • Possess an individual, or any part of it, unless acquired lawfully.
Reptiles		
Common lizard *Zootoca vivipara* Adder *Vipera berus* Slow-worm *Anguis fragilis* Grass snake *Natrix helvetica helvetica*	Part of Sub-section 9(1) of Schedule 5 of The Wildlife and Countryside Act 1981 (as amended)	• Intentionally kill or injure individuals of these species (Section 9(1)).

Subject	Legislation (England)	Relevant prohibited actions
Sand lizard *Lacerta agilis* Smooth snake *Coronella austriaca*	Full protection under Section 9 of Schedule 5 of The Wildlife and Countryside Act 1981 (as amended)	• Deliberately or intentionally kill, capture (take) or intentionally injure; • Deliberately disturb; • Deliberately take or destroy eggs; • Damage or destroy a breeding site or resting place or intentionally damage a place used for shelter; or • Intentionally obstruct access to a place used for shelter.
Birds		
All wild birds	Wildlife and Countryside Act 1981 (as amended)	• Intentionally kill, injure, or take any wild bird or their eggs or nests.
'Schedule 1' birds	Schedule 1 of the Wildlife and Countryside Act 1981 (as amended)	• Disturb any wild bird listed on Schedule 1 whilst it is building a nest or is in, on, or near a nest containing eggs or young; or • Disturb the dependent young of any wild bird listed on Schedule 1.
Mammals		
Bats (all UK species)	Schedule 2 of Conservation of Habitats and Species Regulations (2017)	• Deliberately capture, injure or kill a bat; • Deliberately disturb a bat (disturbance is defined as an action which is likely to: (i) Impair their ability to survive, to breed or reproduce, or to rear or nurture their young; (ii) Impair their ability to hibernate or migrate; or (iii) Affect significantly the local

Subject	Legislation (England)	Relevant prohibited actions
	Schedule 5 of Wildlife and Countryside Act 1981 (as amended)	distribution or abundance of the species); • Damage or destroy a bat roost; • Intentionally or recklessly disturb a bat at a roost; or • Intentionally or recklessly obstruct access to a roost. In this interpretation, a bat roost is "*any structure or place which any wild [bat]...uses for shelter or protection*". Legal opinion is that the roost is protected whether or not the bats are present at the time.
Badger *Meles meles*	Protection of Badgers Act 1992	Under Section 3 of the Act: • Damage a sett or any part of it; • Destroy a sett; • Obstruct access to, or any entrance of, a sett; or • Disturb a badger when it is occupying a sett. A sett is defined legally as any structure or place which displays signs indicating current use by a badger (Natural England 2007).
Hazel dormouse *Muscardinus avellanarius*	Schedule 2 of Conservation of Habitats and Species Regulations (2017)	• Intentionally or deliberately capture or kill, or intentionally injure;

Subject	Legislation (England)	Relevant prohibited actions
	Schedule 5 of Wildlife and Countryside Act 1981 (as amended)	• Deliberately disturb or intentionally or recklessly disturb them in a place used for shelter or protection; • Damage or destroy a breeding site or resting place; • Intentionally or recklessly damage, destroy or obstruct access to a place used for shelter or protection; and • Possess an individual, or any part of it, unless acquired lawfully.
Otter *Lutra lutra*	Schedule 2 of Conservation of Habitats and Species Regulations (2017) Section 9(4)(b) and (c) of Schedule 5 of Wildlife and Countryside Act 1981 (as amended)	• Deliberately capture, injure or kill an otter; • Deliberately disturb an otter in such a way as to be likely to significantly affect the local distribution or abundance of otters or the ability of any significant group of otters to survive, breed, rear or nurture their young; • Intentionally or recklessly disturb any otter whilst it is occupying a holt; • Damage or destroy or intentionally or recklessly obstruct access to an otter holt.
Water vole *Arvicola amphibius*	Section 9 of Schedule 5 of Wildlife and Countryside Act 1981 (as amended)	• Intentionally kill, injure or take water voles; • Possess or control live or dead water voles or derivatives; • Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection; or • Intentionally or recklessly disturb water voles whilst occupying a structure or place used for that purpose.

Subject	Legislation (England)	Relevant prohibited actions
Crustaceans		
White-clawed crayfish *Austropotamobius pallipes*	Section 9(1) of Schedule 5 of Wildlife and Countryside Act 1981 (as amended)	• Intentionally kill, injure or take white-clawed crayfish by any method.

The Environment Act 2021

Full legislation text available at: https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted

The Environment Act 2021, sets out key legislation after the UK's exit from the European Union. With the largest changes to green regulations in decades, the Act includes the establishment of an Office for Environmental Protection, targets on air pollution, water quality and biodiversity, and the enshrinement of the 25 Year Environment Plan in law. The Act also makes provisions for a mandatory 10% net gain in biodiversity for all developments covered by the Town and Country Planning Act and it also introduces a statutory requirement for Local Nature Recovery Strategies.

The Conservation of Habitats and Species Regulations 2017 (as amended)

Full legislation text available at: The Conservation of Habitats and Species Regulations 2017 (as amended) (legislation.gov.uk)

The Wildlife and Countryside Act 1981 (as amended)

Full legislation text available at: http://www.legislation.gov.uk/ukpga/1981/69/contents.

Countryside and Rights of Way Act 2000

Full legislation text available at: http://www.legislation.gov.uk/ukpga/2000/37/contents

Protection of Badgers Act 1992

Full legislation text available at: http://www.legislation.gov.uk/ukpga/1992/51/contents

Section 41 of Natural Environments and Rural Communities (NERC) Act 2006

Full legislation text available at: http://www.legislation.gov.uk/ukpga/2006/16/section/41

Many of the species above, along with a host of others not afforded additional protection, are listed on Section 41 of the NERC Act 2006.

Section 41 (S41) of the Natural Environment and Rural Communities (NERC Act 2006) requires the Secretary of State to publish a list of habitats and species that are of principal importance for the conservation of biodiversity in England. The list (including 56 habitats and 943 species) has been drawn

up in consultation with Natural England and draws upon the UK Biodiversity Action Plan (BAP) List of Priority Species and Habitats.

The S41 list should be used to guide decision-makers such as local and regional authorities to have regard to the conservation of biodiversity in the exercise of their normal functions – as required under Section 40 of the NERC Act 2006. The duty applies to all local authorities and extends beyond just conserving what is already there, to carrying out, supporting and requiring actions that may also restore or enhance biodiversity.

Schedule 9 of Wildlife and Countryside Act 1981 (as amended)

In addition to affording protection to some species, The Wildlife and Countryside Act 1981 (as amended) also names species which are considered invasive and require control. Section 14 of the Act prohibits the introduction into the wild of any animal of a kind which is not ordinarily resident in, and is not a regular visitor to, Great Britain in a wild state, or any species of animal or plant listed in Schedule 9 to the Act. In the main, Schedule 9 lists non-native species that are already established in the wild, but which continue to pose a conservation threat to native biodiversity and habitats, such that further releases should be regulated.

Wild Mammals (Protection) Act 1996

Full legislation text is available at: http://www.legislation.gov.uk/ukpga/1996/3/contents

Under this legislation it is an offence to cause unnecessary suffering to wild mammals, including by crushing and asphyxiation. It largely deals with issues of animal welfare, and covers all non-domestic mammals including commonly encountered mammals on development sites such as rabbits, foxes and field voles.

Birds of Conservation Concern (BoCC)

This is a quantitative assessment of the status of populations of bird species which regularly occur in the UK, undertaken by the UK's leading bird conservation organisations. It assesses a total of 245 species against a set of objective criteria to place each on one of three lists – Green, Amber and Red – indicating an increasing level of conservation concern. There are currently 70 species on the Red list, 103 on the Amber list and 72 on the Green list. The classifications described have no statutory implications, and are used merely as a tool for assessing scarcity and conservation value of a given species.

National Planning Policy Framework (NPPF)

Full text is available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2.

The revised NPPF was updated on 12 December 2024 setting out the Government's planning policies for England and the process by which these should be applied. The policies within the NPPF are a material consideration in the planning process. The key principle of the NPPF is a presumption in favour of sustainable development, with sustainable development defined as a balance between economic, social and environmental needs.

Policies 187 to 201 of the NPPF address conserving and enhancing the natural environment, stating that the planning system should:

- Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes;
- Recognise the wider benefits of ecosystem services; and
- Minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

Furthermore, there is a focus on re-use of existing brownfield sites or sites of low environmental value as a priority, and discouraging development in and around National Parks, Sites of Specific Scientific Interest, the Broads, and National Landscapes other than in exceptional circumstances.

Where possible, planning policies should also:

- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

8.2. Appendix 2: UK Habitat Classification species list

Please note that these lists are intended to be incidental records and do not constitute a full botanical survey of the site. Relative abundance is given using the DAFOR scale. Please see Table 2 for details.

Other neutral grassland (g3c) - field margins

Common Name	Systematic Name	Relative abundance
Cow parsley	*Anthriscus sylvestris*	D
Cock's-foot	*Dactylis glomerata*	O
Common nettle	*Urtica dioica*	O
Creeping soft-grass	*Holcus mollis*	O
Smooth-stalked meadow grass	*Poa pratensis*	O
Sweet vernal grass	*Anthoxanthum odoratum*	O
Barren brome	*Bromus sterilis L*	R
Bramble sp.	*Rubus fruticosus*	R
Bulbous buttercup	*Ranunculus bulbosus*	R
Bush vetch	*Vicia sepium*	R
Cleavers	*Galium aparine*	R
Cranesbill sp	*Geranium sp.*	R
Crested hair grass	*Koeleria macrantha*	R
Creeping buttercup	*Ranunculus repens*	R
Creeping thistle	*Cirsium arvense*	R
Dandelion sp.	*Taraxacum sp.*	R
Dock sp.	*Rumex sp.*	R
Hogweed	*Heracleum sphondylium*	R
Non-native bluebell	*N/A*	R
Lesser celandine	*Ficaria verna*	R
Lesser hawkbit	*Leontodon saxatilis Lam*	R
Red campion	*Silene dioica*	R
White clover	*Trifolium repens*	R
White dead-nettle	*Lamium album*	R

Common Name	Systematic Name	Relative abundance
Wood forget-me-not	*Myosotis sylvatica*	R

Other neutral grassland (g3c) - public access field

Common Name	Systematic Name	Relative abundance
Greater plantain	*Plantago major*	A
Creeping thistle	*Cirsium arvense*	F
Sweet vernal grass	*Anthoxanthum odoratum*	F
Smooth-stalked meadow grass	*Poa pratensis*	F
Creeping soft-grass	*Holcus mollis*	O
Cow parsley	*Anthriscus sylvestris*	O
Yorkshire-fog	*Holcus lanatus*	O
Ribwort plantain	*Plantago lanceolata*	O
Barren brome	*Bromus sterilis L*	R
Bramble sp.	*Rubus fruticosus*	R
Bulbous buttercup	*Ranunculus bulbosus*	R
Bush vetch	*Vicia sepium*	R
Broad-leaved dock	*Rumex obtusifolius*	R
Common chickweed	*Stellaria media*	R
Euphorbia sp.	*Euphorbia sp.*	R
Hairy tare	*Vicia hirsuta*	R
Hop trefoil	*Trifolium campestre*	R
Hogweed	*Heracleum sphondylium*	R
Lesser hawkbit	*Leontodon saxatilis Lam*	R
Red clover	*Trifolium pratense*	R
Yarrow	*Achillea millefolium*	R

Other neutral grassland (g3c) – large central field

Common Name	Systematic Name	Relative abundance
Sweet vernal grass	*Anthoxanthum odoratum*	D
Meadow buttercup	*Ranunculus acris*	A

Common Name	Systematic Name	Relative abundance
Broad-leaved dock	*Rumex obtusifolius*	O
Common sorrel	*Rumex acetosa*	O
Red clover	*Trifolium pratense*	O
Creeping buttercup	*Ranunculus repens*	R
Creeping soft-grass	*Holcus mollis*	R
Crested hairgrass	*Koeleria macrantha*	R
Broad-leaved dock	*Rumex obtusifolius*	R
Bush vetch	*Vicia sepium*	R
Dandelion sp.	*Taraxacum sp.*	R
Goat's-beard	*Aruncus dioicus*	R
Hogweed	*Heracleum sphondylium*	R
Mouse-ear chickweed	*Rumex obtusifolius*	R

Other neutral grassland (g3c) – north-western field

Common Name	Systematic Name	Relative abundance
Sweet vernal grass	*Anthoxanthum odoratum*	D
Common trefoil	*Lotus corniculatus*	F
Meadow vetchling	*Lathyrus pratensis*	F
Red clover	*Trifolium pratense*	O
Common sorrel	*Rumex acetosa*	R
Common vetch	*Vicia sativa*	R
Chickweed	*Stellaria media agg.*	R
Crested dog's tail	*Cynosurus cristatus*	R
Dandelion sp.	*Taraxacum*	R
Germander speedwell	*Veronica chamaedrys*	R
Hogweed	*Heracleum sphondylium*	R
Meadow buttercup	*Ranunculus acris*	R
Reed grass	*Calamagrostis sp.*	R
Ribwort plantain	*Plantago lanceolata*	R

Common Name	Systematic Name	Relative abundance
Yorkshire-fog	*Holcus lanatus*	R

Modified grassland (g4)

Common Name	Systematic Name	Relative abundance
Sweet vernal grass	*Anthoxanthum odoratum*	D
Fescue sp.	*Festuca sp.*	D
Chickweed	*Stellaria media agg.*	O
Meadow buttercup	*Ranunculus acris*	R
Ribwort plantain	*Plantago lanceolata*	R

Native hedgerow withy trees (h2a6)

Common Name	Systematic Name	Relative abundance
Persian ivy	*Hedera colchica*	D
Hawthorn	*Crataegus monogyna*	F
Ash	*Fraxinus excelsior*	R
Alder	*Alnus glutinosa*	R
Bramble	*Rubus fruticosus*	R
Holly	*Ilex aquifolium*	R

Species-rich native hedgerow with trees associated with a bank or ditch (h2a5)

Common Name	Systematic Name	Relative abundance
Ash	*Fraxinus excelsior*	F
Bramble	*Rubus fruticosus*	F
Hawthorn	*Crataegus monogyna*	F
Blackthorn	*Prunus spinosa*	O
Elder	*Sambucus nigra*	R
Holly	*Ilex aquifolium*	R
Oak	*Quercus sp.*	R

Woodland 1 - north-south belt

Common Name	Systematic Name	Relative abundance
Common nettle	*Urtica dioica*	D
Cleavers	*Galium aparine*	A
Cow parsley	*Anthriscus sylvestris*	A
Hawthorn	*Crataegus monogyna*	A
Garlic mustard	*Alliaria petiolata*	A
Alder	*Alnus glutinosa*	F
Ash	*Fraxinus excelsior*	F
Blackthorn	*Prunus spinosa*	F
Elm	*Ulmus minor sensu Stace*	F
Field maple	*Acer campestre*	F
Oak	*Quercus sp.*	F
Bramble	*Rubus fruticosus*	R
Dog rose	*Rosa canina*	R
Elder	*Sambucus nigra*	R
Hazel	*Corylus avellana*	R
Holly	*Ilex aquifolium*	R
Poplar sp.	*Populus sp.*	R
Lords-and-ladies	*Arum maculatum*	R

Woodland 2 - east-west belt

Common Name	Systematic Name	Relative abundance
Blackthorn	*Prunus spinosa*	D
Bramble	*Rubus fruticosus*	O
Greater stitchwort	*Stellaria holostea*	O
Hawthorn	*Crataegus monogyna*	O
Elder	*Sambucus nigra*	R
Gorse	*Ulex europaeus*	R
Hazel	*Corylus avellana*	R

Common Name	Systematic Name	Relative abundance
Holly	*Ilex aquifolium*	R
Oak	*Quercus sp.*	R

Woodland 3 - east and west of watercourse in the west

Common Name	Systematic Name	Relative abundance
Aspen	*Populus tremula*	D
Willow	*Salix sp.*	D
Common nettle	*Urtica dioica*	D
Hawthorn	*Crataegus monogyna*	R

Woodland 4 - on road embankment to the north of A45

Common Name	Systematic Name	Relative abundance
Silver birch	*Betula pendula*	D
Willow	*Salix sp.*	O
Oak	*Quercus sp.*	A
Ash	*Fraxinus excelsior*	A
Hawthorn	*Crataegus monogyna*	A
Germander speedwell	*Veronica chamaedrys*	R
Ground ivy	*Glechoma hederacea*	R
Forget-me-not sp.	*Myosotis sp.*	R

Woodland 5 – south-eastern corner

Common Name	Systematic Name	Relative abundance
Cow parsley	*Anthriscus sylvestris*	F
Garlic mustard	*Alliaria petiolata*	F
Non-native oak	*N/A*	F
Alder	*Alnus glutinosa*	R
Ash (sapling)	*Fraxinus excelsior*	R
Cleavers	*Galium aparine*	R
Hawthorn	*Crataegus monogyna*	R

Common Name	Systematic Name	Relative abundance
Hogweed	*Heracleum sphondylium*	R

Mixed scrub - belts across central fields

Common Name	Systematic Name	Relative abundance
Goat willow	*Salix caprea*	D
Bramble	*Rubus fruticosus*	O
Ash	*Fraxinus excelsior*	A
Blackthorn	*Prunus spinosa*	R
Crack willow	*Salix fragilis*	R
Gorse	*Ulex europaeus*	R
Hawthorn	*Crataegus monogyna*	R
Oak	*Quercus sp.*	R
Silver birch	*Betula pendula*	R

Mixed scrub - south-west corner

Common Name	Systematic Name	Relative abundance
Oak	*Quercus sp.*	D
Goat willow	*Salix caprea*	F
Ash	*Fraxinus excelsior*	O
Blackthorn	*Prunus spinosa*	O
Bramble	*Rubus fruticosus*	O
Hawthorn	*Crataegus monogyna*	O
Gorse	*Ulex europaeus*	R

Willow scrub

Common Name	Systematic Name	Relative abundance
Goat willow	*Salix caprea*	D
Creeping thistle	*Cirsium arvense*	A
Lesser pond-sedge	*Carex acutiformis*	F
Creeping buttercup	*Ranunculus repens*	F

Common Name	Systematic Name	Relative abundance
Dog rose	*Rosa canina*	O
Oak (sapling)	*Quercus sp.*	R

8.3. Appendix 3: Site photographs

Photograph 3: Other neutral grassland (g3c)- eastern field

Photograph 4: Other neutral grassland (g3c)- field margins

Photograph 5: Other neutral grassland (g3c)

Photograph 6: Other neutral grassland (g3c)

Photograph 7: Modified grassland (g4)

Photograph 8: Mixed scrub (h3h)

Photograph 9: Mixed scrub (h3h)

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Photograph 16: Species-rich native hedgerow (h2a5)

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Photograph 23: Potential badger sett

Photograph 24: Wet depression dominated by rushes

Photograph 25: Mammal burrows in bankside

Photograph 26: Badger sett entrance and mammal path

Photograph 27: Badger sett entrance and mammal path

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MKA
ECOLOGY

Baseline Biodiversity Assessment

Land off London Road, Ryton-on-Dunsmore

Site	*Land off London Road, Ryton-on-Dunsmore*
Project number	*173425*
Client name / Address	*Tarmac Trading Ltd, Ground Floor T3 Trinity Park, Bickenhill Lane, Birmingham, United Kingdom, B37 7ES*

Version number	**Date of issue**	**Revisions**
1.0	*15/05/2025*	*Original*

Author	[redacted]	[redacted]
Reviewed by	[redacted]	
Authorised By	[redacted]	
Contact	[redacted]	

Declaration of compliance

The information which we have provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

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CONTENTS

1. EXECUTIVE SUMMARY

In April 2025 MKA Ecology Ltd was commissioned to undertake an assessment of the Baseline biodiversity at the Land off London Road, Ryton-on-Dunsmore by Tarmac Trading Ltd in order to support an application to include this site within Rugby Borough Council's Local Plan. To provide a quantitative assessment the Statutory Biodiversity Metric was used. The purpose of this assessment is to assess the value of the habitats present within this site and to identify key constraints and opportunities for achieving a minimum of 10% net gain.

It is expected that the site would be used for industrial/ commercial purposes. However, there are no detailed proposals at this stage that can be assessed through the Statutory Biodiversity Metric. This report should be read alongside the Preliminary Ecological Appraisal produced by MKA Ecology in May 2025.

The Site comprises other neutral grassland, modified grassland, woodland, mixed scrub, willow scrub, a pond, a rural tree, unvegetated land, bare ground, watercourses and hedgerows and covers a total of 23.49 hectares. The only habitat that is of a higher distinctiveness than moderate is the Species-rich native hedgerow with trees - associated with bank or ditch, which is of very high distinctiveness. The baseline biodiversity value is 144.92 habitat units and 5.71 hedgerow units. The minimum units required to achieve 10% uplift for this Site are 159.41 habitat units and 6.28 hedgerow units.

The quality of the habitats is such that a positive outcome for biodiversity can be achieved, however, it will require design development to be cognisant of the existing areas of high value. Higher value areas should be retained (e.g. woodland, other neutral grassland and hedgerows), with habitat creation and enhancement required across the wider site to deliver a net gain in biodiversity.

2. INTRODUCTION

2.1. Purpose

In April 2025, MKA Ecology Ltd was commissioned to undertake an assessment of the Baseline biodiversity at the Land off London Road, Ryton-on-Dunsmore by Tarmac Trading Ltd in order to support an application to include this site within Rugby Borough Council's Local Plan. To provide a quantitative assessment the Statutory Biodiversity Metric was used. This assessment has been prepared to present the baseline biodiversity value of the Site and to identify key constraints and opportunities for achieving a minimum of 10% net gain.

It is expected that the site would be used for industrial/ commercial purposes. However, as the purpose of this assessment was solely to assess the baseline, no change calculations have therefore been carried out.

2.2. Site survey

A Preliminary Ecological Appraisal and biodiversity baseline assessment was conducted by MKA Ecology Ltd on 06 May 2025 (MKA Ecology Ltd, 2025) by Liam Price MCIEEM and Hazel Dudley. Both Liam and Hazel are considered competent assessors under the Statutory Biodiversity Metric requirements (Defra, 2024).

Survey constraints of the Preliminary Ecological Appraisal are described in Section 2.9.

There are no irreplaceable habitats within the redline boundary. Please note that any impacts on designated sites and protected species that may result from the development have been addressed in the Preliminary Ecological Appraisal, which also outlines plans for mitigation and enhancement where required (MKA Ecology Ltd, 2025).

2.3. Statutory Biodiversity Metric assessor

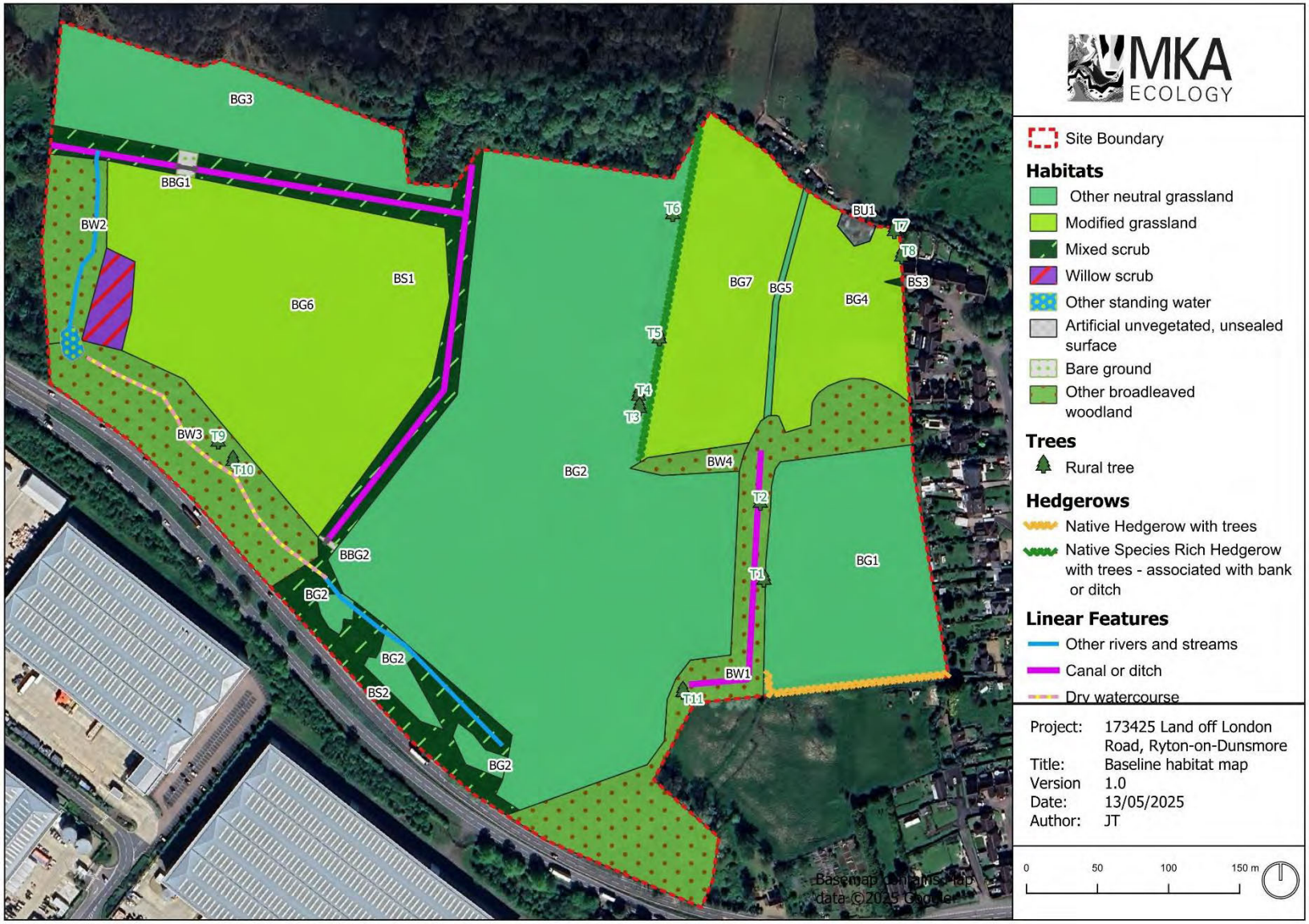
[redacted].

2.4. Trading Summary

The Defra Biodiversity Statutory Metric includes a Trading Summary which must be satisfied to achieve a positive outcome in a BNG assessment. The trading rules ensure that habitat losses are compensated for on a “like for like” or “like for better” basis. Newly created or enhanced habitats should achieve a higher distinctiveness and/or condition than those lost. These principles should inform any future design.

Further details on how the metric is calculated is provided in the aforementioned publications, with more Site-specific detail provided in Appendix 1 and Appendix 2.

Figure 1: Baseline habitats at Land off London Road, Ryton-on-Dunsmore



2.5. Hedgerows

Hedgerows, given their unique linear characteristic and their position as 'edge habitats' are treated as linear features in the Statutory Biodiversity Metric calculator and are calculated as 'hedgerow units'. The metrics calculated for hedgerows have therefore been calculated and presented separately. Hedgerows are under the UK Habitat classification methodology (UKHab Ltd, 2023) as linear features that are less than five metres wide at the base. The distinction between hedgerows and area scrub habitat is important for planning appropriate compensation. Hedgerows were mapped, and their lengths calculated, using QGIS.

2.6. Rivers and streams

Rivers and streams, given their linear form and important role in habitat connectivity, are treated as linear features in the Statutory Biodiversity Metric calculator and are calculated as 'watercourse units'. Dedicated River Condition Assessments will be required to assess with value of the watercourses. This is outside the scope of this report and therefore watercourses are omitted from this assessment.

2.7. Modifiers

Baseline habitats are assigned the following scores:

- Distinctiveness: A measure of the type and importance of a habitat;
- Condition: A measure of the present or predicted condition of a habitat type; and
- Strategic significance: How a habitat is regarded within Local Planning Policy.

2.8. Habitat degradation

It is confirmed that the baseline habitats have not been significantly altered or modified since 30 January 2020 and, as such, it is appropriate to assess the baseline habitats in their current condition.

2.9. Assumptions and constraints

Constraints experienced during the Preliminary Ecological Appraisal which may influence the baseline assessment of habitats present are as follows:

- Some areas of grassland, mixed scrub and woodland could not be accessed due to fencing or dense vegetation. These areas were surveyed from vantage points and species list were created based on what could be seen from the vantage point. It is considered likely that these areas are similar in composition to the rest of the Site, and therefore the access constraints are not considered to have a significant impact on the result of this survey.

3. RESULTS AND RECOMMENDATIONS

3.1. Habitat Assessment

The Site was found to comprise other neutral grassland, modified grassland, other broadleaved woodland, mixed scrub, willow scrub, ditches, watercourses, a pond and native species-rich hedgerows. More detailed species lists, along with their relative abundance, can be found in Appendix 3 and photographs in Appendix 4. The UK habitat classification survey map is provided in Figure 1. Descriptions of the habitat types present along with dominant species compositions are provided below. Details of the condition assessments are provided in Appendix 1.

Other neutral grassland (g3c)

The majority of the Site comprises other neutral grassland spread across five fields. One field to the east of the Site is accessible via public footpaths and comprises dominant sweet vernal grass *Anthoxanthum odoratum*, red clover *Trifolium pratense* and bulbous buttercup *Ranunculus bulbosus.* The field margins have a higher species diversity with an average species count of 8.3 per m^2 and herbs including wood forget-me-not *Myosotis sylvatica*, bush vetch *Vicia sepium* and hop trefoil *Trifolium campestre*.

The remaining fields are not publicly accessible and comprise dominant sweet vernal grass, rare Yorkshire-fog *Holcus lanatus*, crested dog's tail *Cynosurus cristatus* and barren brome *Bromus sterilis L*. Herbs include common chickweed *Stellaria media*, common sorrel *Rumex acetosa,* hairy tare *Vicia hirsuta* and bulbous buttercup. There are wetter depressions with locally abundant rush *Juncus* sp. These other fields do not have a distinct margin with greater diversity. Average species count is 6 per m^2 across the remaining fields.

The grassland fields all appear to be managed through regularly mowing, although not recently. The sward is uniform at a height of approximately 15cm.

A dry (at the time of survey) depression ran through the middle of the north-eastern modified grassland field. The diversity was greater here than the surrounding grassland with dominant sweet vernal grass, locally abundant soft rush *Juncus effusus* and cuckoo flower *Cardamine pratensis*, occasional willowherb sp. *Epilobium* and rare lesser celandine *Ficaria verna*, dock sp. *Rumex* and meadow buttercup *Ranunculus acris*. As such, this area is classified as other neutral grassland.

Patches of other neutral grassland is present in the south of the site, among an area of mixed scrub. Quadrats could not be taken due to access issues, but it assumed based on vantage point survey that the grassland is similar in composition to the adjacent fields.

Modified grassland (g4)

In the north-east of the Site, there is a field of modified grassland dominated by fescue sp., which is currently used as a horse paddock and play space.

The field in the west of the site is an area of rough grassland that is likely to be infrequently horse grazed, comprising dominant sweet vernal grass and crested dog's-tail as well as rare meadow buttercup, red clover and lesser hawkbit *Leontodon saxatilis Lam*. Scattered hawthorn and gorse scrub were present.

Mixed scrub (h3h)

Belts of mixed scrub associated with ditches are present across the Site, comprising dominant goat willow *Salix caprea*, occasional ash oak blackthorn *Prunus spinosa* and hawthorn and rare gorse. In the south-west of the Site, the mixed scrub is dominated by goat willow and oak.

A patch mixed scrub is present in the south of the site. A full species list could not be taken due to access issues, but it assumed based on vantage point survey there is dominant goat willow and oak present.

Willow scrub (h3j)

A small patch of willow scrub comprising dominant immature goat willow and a ground layer of creeping buttercup *Ranunculus repens* L, creeping thistle *Cirsium arvense* and lesser pond-sedge *Carex acutiformis* is present in the west of the site. This area was either recently planted or allowed to develop as individuals were uniformly young.

Other broadleaved woodland (w1g)

A woodland belt running east-west towards the centre of the site comprises dominant blackthorn, with occasional hawthorn, bramble Rubus fruticosus and greater stitchwort Stellaria holostea.

There is a woodland belt running north-south through the Site comprising abundant hawthorn, frequent field maple *Acer campestre*, ash and alder *Alnus glutinosa* and rare hazel *Corylus avellana*, rowan *Sorbus aucuparia*, holly *Ilex aquifolium* and yew *Taxus baccata*.

The woodland belt running along the embankment to the north of the A45 is woodland is listed on the priority habitat inventory as deciduous woodland. However, the habitat is not of sufficient quality to align with the lowland mixed deciduous woodland priority habitat type. The woodland was planted/developed on the embankment constructed as part of the A45 to the south. The diversity of this woodland is low, being dominated by silver birch *Betula pendula*, with abundant willow (primarily around the dry ditch), hawthorn *Crataegus monogyna* and ash *Fraxinus excelsior*, with occasional oak *Quercus robur*. The ground flora was limited to abundant bramble and grass, occasional cleavers *Galium aparine*, gorse

Ulex europaeus, ferns and rare germander speedwell *Veronica chamaedrys*, ground ivy *Glechoma hederacea* and forget-me-not sp *Myosotis sp.* The trees were of uniform age (typically semi-mature), with some seedlings showing evidence of regeneration.

The watercourse channel and associated bank in the west of the Site is surrounded by woodland comprising dominant willow species, aspen *Populus tremula* and silver birch. The channel is deep sided, with willow growing within the channel and on the banks. The land sloped up the west to the west of the watercourse.

In the south of the Site there is a woodland comprising dominant non-native oak, with rare alder, hawthorn and ash saplings.

Native hedgerow with trees (h2a6)

A native hedgerow with trees comprising dominant Persian ivy *Hedera colchica*, frequent hawthorn and rare ash, alder and holly is present in the east of the Site.

Species-rich native hedgerow with trees associated with a bank or ditch (h2a5)

In the north of the Site a hedgerow comprising frequent blackthorn, hawthorn and large mature oaks is present.

Other standing water (r1g)

There is a pond in the west of the Site, connected to a slow-moving watercourse channel.

Other rivers and streams (r2b)

A watercourse channel is present along the eastern boundary of the Site and running north-south through the centre of the Site. The water is slow-moving and less than 30cm deep at most points.

A watercourse is present running to the north of the pond. This was a deep sided channel (approx. 2m), with willows silver birches growing within it. The water was very shallow at the time of survey. A dry channel is present to the south-east of the pond, however, this was dry at the time of survey.

Canal or ditch (r1e)

A network of canals is present, which appear to be seasonally wet. At the time of the survey the ditches were dry.

Individual tree

A mature pedunculate oak is present in the north-east corner of the site. An owl box is present approximately 3-4m off the ground.

Bare ground

Two small areas of bare ground are present where there are accessways between fields. A third area of bare ground is present in the north-east corner where several sheds are present that are used to stable horses.

3.2. Biodiversity unit baseline

The biodiversity unit baseline for Land off London Road, Ryton-on-Dunsmore is presented in Table 1. A detailed breakdown of habitat and hedgerow extents and units are presented Table 2 and Table 3, respectively. The full results can be found in Appendix 2.

Table 1: Biodiversity unit baseline and required uplift at Land off London Road, Ryton-on-Dunsmore

Habitat	Baseline biodiversity units	Units required to achieve 10% uplift *
Habitats	144.92	159.41
Hedgerows	5.71	6.28

*Note that within this trading rules would also need to be satisfied; see Section 2.4.

3.1. Habitat Units

The largest number of habitat units (91.91) is delivered by the moderate condition other neutral grassland that dominates most of the fields. The second highest number of units (28.32) is delivered by the other woodland; broadleaved habitat. Although the woodland is smaller in area than the grassland, it is also a medium distinctiveness habitat in moderate condition.

Table 2: Attribution of multiplier levels to each baseline area habitat type

Habitat	Area (hectares)	Distinctiveness (automatically assigned)	Condition	Strategic significance	Biodiversity Units*
Grassland					
Other neutral grassland	11.489	Medium (4)	Moderate (2)	Area not in local strategy (Low)	91.91
Modified grassland	6.606	Low (2)	Poor (1)	Area not in local strategy (Low)	13.21
Woodland and forest					

Habitat	Area (hectares)	Distinctiveness (automatically assigned)	Condition	Strategic significance	Biodiversity Units*
Other woodland; broadleaved	2.972	Medium (4)	Moderate (2)	Location ecologically desirable but not in local policy (Medium)	26.15
Other woodland; broadleaved	0.492	Medium (4)	Poor (1)	Location ecologically desirable but not in local policy (Medium)	2.16
Heathland and scrub					
Mixed scrub	0.662	Medium (4)	Moderate (2)	Area not in local strategy (Low)	5.30
Willow scrub	0.174	Medium (4)	Moderate (2)	Area not in local strategy (Low)	1.39
Mixed scrub	0.989	Medium (4)	Poor (1)	Area not in local strategy (Low)	3.96
Individual trees					
Rural tree	0.0366	Medium (4)	Good (3)	Location ecologically desirable but not in local policy (Medium)	0.48
Lakes					
Ponds (non-priority habitat)	0.031	Medium (4)	Moderate (2)	Location ecologically desirable but not in local policy (Medium)	0.27

Habitat	Area (hectares)	Distinctiveness (automatically assigned)	Condition	Strategic significance	Biodiversity Units*
Urban					
Bare ground	0.028	Low (2)	Poor (1)	Area not in local strategy (Low)	0.06
Artificial unvegetated, unsealed surface	0.038	V.Low (0)	N/A - Other	Area not in local strategy (Low)	0.00
Total	**23.485⁺**	**-**	**-**	**-**	**144.92**

* Figure rounded to 2 decimal places

⁺ Excludes individual trees

3.2. Hedgerow Units

The species-rich native hedgerow with trees - associated with bank or ditch delivers a greater number of hedgerow units (3.66) than the native hedgerow with trees (2.05). Despite the former being of shorter length, it has a higher distinctiveness and condition.

Table 3: Attribution of multiplier levels to each baseline linear habitat type

Habitat	Area (kilometres)	Distinctiveness (automatically assigned)	Condition	Strategic significance	Biodiversity Units
Species-rich native hedgerow with trees - associated with bank or ditch	0.139	V.High (8)	Good (3)	Location ecologically desirable but not in local policy (Medium)	3.66
Native hedgerow with trees	0.233	Medium (4)	Moderate (2)	Location ecologically desirable but not in local policy (Medium)	2.05
Total	**0.371**	**-**	**-**	**-**	**5.71**

3.3. Trading summary

The Defra Statutory Biodiversity Metric includes a Trading Summary which must be satisfied to achieve a positive outcome in the Net Gain assessment. The habitat types found onsite and the required action to meet these trading rules are shown in Table 4 below.

Table 4: Habitat type and required action to satisfy metric trading rules

Habitat type and area	Distinctiveness	Required action to meet trading rules
Other neutral grassland	Medium	Same broad habitat or higher distinctiveness habitat required
Modified grassland	Low	Same distinctiveness or better habitat required
Other woodland; broadleaved	Medium	Same broad habitat or higher distinctiveness habitat required
Mixed scrub	Medium	Same broad habitat or higher distinctiveness habitat required
Willow scrub	Medium	Same broad habitat or higher distinctiveness habitat required
Rural tree	Medium	Same broad habitat or higher distinctiveness habitat required
Ponds (non-priority habitat)	Medium	Same broad habitat or higher distinctiveness habitat required
Bare ground	Low	Same distinctiveness or better habitat required
Artificial unvegetated, unsealed surface	V.Low	Compensation not required
Species-rich native hedgerow with trees - associated with bank or ditch	V.High	Losses must be replaced with hedgerow units of the same habitat type
Native hedgerow with trees	Medium	Same distinctiveness band or better

3.4. Recommendations

The Site currently comprises a high proportion of medium distinctiveness habitats, such as woodland and other neutral grassland. It is recommended that these habitats are retained and enhanced, where possible. The hedgerow of very high distinctiveness should be retained. Existing gaps in linear features (e.g. such as hedgerows and woodland and scrub belts) should be utilised to facilitate access between parcels. Development should be focussed on areas of lower value, such as the modified grassland.

Recommendation 1
Retain and enhance higher value habitats where possible.

Habitat creation and enhancement should follow the guidance of the PEA (MKA Ecology Ltd, 2025) to target benefits for locally and nationally notable species. This could include wildflower meadows, ponds, wetlands, reedbeds, woodland and hedgerows, which would provide habitat for bittern, Cetti's warbler, and invertebrates like brown hairstreak and adonis ladybird. Consideration should also be given to the inclusion of green infrastructure, including green rooves and walls and sustainable drainage features (SuDS).

Recommendation 2
Create and enhance habitats to target benefits for notable species. Incorporate green infrastructure into the design where possible.

Biodiversity Net Gain calculations will be required as part of any future planning application. The design development process should be informed by these calculations, including the good practice principles that underpin them. This would need to be followed by a Habitat Maintenance and Monitoring Plan (HMMP) to detail how the habitat will be managed and monitored for 30 years.

Recommendation 3
Carry out BNG assessment(s) to support design development and planning applications to ensure a 10% uplift can be achieved. This will be followed by the development of an HMMP.

4. CONCLUSIONS

In April 2025 MKA Ecology Ltd was commissioned to undertake an assessment of the Baseline biodiversity at the Land off London Road, Ryton-on-Dunsmore by Tarmac Trading Ltd in order to support an application to include this site within Rugby Borough Council's Local Plan. To provide a quantitative assessment the Statutory Biodiversity Metric was used. The purpose of this assessment is to assess the value of the habitats present within this site and to identify key constraints and opportunities for achieving a minimum of 10% net gain.

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The Site comprises other neutral grassland, modified grassland, woodland, mixed scrub, willow scrub, a pond, a rural tree, unvegetated land, bare ground, watercourses and hedgerows and covers a total of 23.49 hectares. The only habitat that is of a higher distinctiveness than moderate is the Species-rich native hedgerow with trees - associated with bank or ditch, which is of very high distinctiveness. The baseline biodiversity value is 144.92 habitat units and 5.71 hedgerow units. The minimum units required to achieve 10% uplift for this Site are 159.41 habitat units and 6.28 hedgerow units.

The quality of the habitats is such that a positive outcome for biodiversity can be achieved, however, it will require design development to be cognisant of the existing areas of high value. Higher value areas should be retained (e.g. woodland, other neutral grassland and hedgerows), with habitat creation and enhancement required across the wider site to deliver a net gain in biodiversity.

5. REFERENCES

Baker, J., Hoskin, R. & Butterworth., T. (2019) *Biodiversity net gain: Good practice principles for development. Part A. A practical guide.* CIRIA, UK

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6. APPENDICES

6.1. Appendix 1: Assignment of biodiversity metric multipliers

Strategic significance

Rugby Borough Council has not yet published a Local Natural Recovery Strategy (LNRS). Therefore, strategic significance has been assigned based on the available local planning documents, including the Rugby Borough Council Local Plan (2019) and Warwickshire, Coventry and Solihull Local Biodiversity Action Plan (2005).

Woodlands, individual trees and ponds, have all been assigned medium strategic significance as they deliver on policies NE2 and NE3 within the Rugby Borough Council Local Plan (2019). All other habitats have been assigned low strategic significance. Additionally, the current native hedgerows have been assigned high strategic significance because they qualify as a Habitat of Principal Importance (HPI) as listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

Condition

The below tables detail the rationale for the condition assessments made for each habitat type.

Current habitats

Grassland – other neutral grassland

BG1			
Condition Assessment Criteria		**Rationale for Meeting Condition Assessment Criteria**	
A	*The grassland is a good representation of the habitat type it has been identified as, based on its UKHab description – the appearance and composition of the vegetation closely matches the characteristics of the specific grassland habitat type. Indicator species listed by UKHab for the specific grassland habitat type are consistently present.* **Note: this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.**	The grassland contains a range of characteristic species and is dominated by dominant sweet vernal grass *Anthoxanthum odoratum*, red clover *Trifolium pratense* and bulbous buttercup *Ranunculus bulbosus*	✓
B	*Sward height is varied (at least 20% of the sward is less than 7cm and at least 20% of the sward is more than 7cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.*	Sward height is varied throughout.	✓
C	*Cover of bare ground is between 1% and 5%, including localised areas, for example rabbit warrens.*	Minimal bare ground is present throughout (<1%).	x
D	*Cover of bracken Pteridium aquilinum is less than 20% and cover of scrub (including bramble Rubus fruticosus agg.) is less than 5%*	No bracken is present and negligible amounts of scrub is present.	✓
E	*Combined cover of species indicative of sub-optimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area.* *If any invasive non-native plant species (as listed on Schedule 9 of the Wildlife and Countryside Act) are present, this criterion is automatically failed.*	No signs of harmful management or impacts are present.	✓
F	*There are 10 or more vascular plant species per m² present, including forbs that are characteristic of the habitat type (species indicative of sub-optimal conditions and non-native invasive species cannot contribute towards this count)*	Species diversity is higher around the margins of the site, but this is still only an average of 8.3 species per m².	x
	Condition: Moderate Meets four out of six criteria, including criterion A.		

BG2			
Condition Assessment Criteria		**Rationale for Meeting Condition Assessment Criteria**	
A	*The grassland is a good representation of the habitat type it has been identified as, based on its UKHab description – the appearance and composition of the vegetation closely matches the characteristics of the specific grassland habitat type. Indicator species listed by UKHab for the specific grassland habitat type are consistently present.* **Note: this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.**	The grassland contains a range of characteristic species and is dominated by grasses and buttercups *Ranunculus sp.*, typical of a neutral grassland.	✓
B	*Sward height is varied (at least 20% of the sward is less than 7cm and at least 20% of the sward is more than 7cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.*	Sward height is consistently greater than 7cm throughout.	x
C	*Cover of bare ground is between 1% and 5%, including localised areas, for example rabbit warrens.*	A small number of mole hills are present, however, this accounts for less than 1% of the ground cover.	x
D	*Cover of bracken Pteridium aquilinum is less than 20% and cover of scrub (including bramble Rubus fruticosus agg.) is less than 5%*	No bracken or scrub are present.	✓
E	*Combined cover of species indicative of sub-optimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area.* *If any invasive non-native plant species (as listed on Schedule 9 of the Wildlife and Countryside Act) are present, this criterion is automatically failed.*	No signs of harmful management or impacts are present.	✓
F	*There are 10 or more vascular plant species per m² present, including forbs that are characteristic of the habitat type (species indicative of sub-optimal conditions and non-native invasive species cannot contribute towards this count)*	Low species diversity was present with approximately 6 species per m² present.	x
	Target Condition: Moderate Meets three out of six criteria, including criterion A.		

BG3			
Condition Assessment Criteria		**Rationale for Meeting Condition Assessment Criteria**	
1	*The grassland is a good representation of the habitat type it has been identified as, based on its UKHab description – the appearance and composition of the vegetation closely matches the*	The grassland closely matches it's UK Habs definition with grasses including sweet vernal grass and a range of characteristic herbs, including meadow buttercup and common sorrel.	✓

BG3			
Condition Assessment Criteria		**Rationale for Meeting Condition Assessment Criteria**	
	characteristics of the specific grassland habitat type. Indicator species listed by UKHab for the specific grassland habitat type are consistently present. **Note: this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.**		
2	*Sward height is varied (at least 20% of the sward is less than 7cm and at least 20% of the sward is more than 7cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.*	Tussocky grassland has developed with a varied sward.	✓
3	*Cover of bare ground is between 1% and 5%, including localised areas, for example rabbit warrens.*	Bare ground cover is 0%	x
4	*Cover of bracken Pteridium aquilinum is less than 20% and cover of scrub (including bramble Rubus fruticosus agg.) is less than 5%*	Bracken cover is 0%	✓
5	*Combined cover of species indicative of sub-optimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area.* *If any invasive non-native plant species (as listed on Schedule 9 of the Wildlife and Countryside Act) are present, this criterion is automatically failed.*	Species indicative of sub-optimal condition are restricted to the edges of fields and below 5% cover.	✓
6	*There are 10 or more vascular plant species per m^2 present, including forbs that are characteristic of the habitat type (species indicative of sub-optimal conditions and non-native invasive species cannot contribute towards this count)*	Should be achievable with appropriate planting	x
	Target Condition: Moderate Meets four out of six criteria, including criterion 1.		

BG5			
Condition Assessment Criteria		**Rationale for Meeting Condition Assessment Criteria**	
A	*The grassland is a good representation of the habitat type it has been identified as, based on its UKHab description – the appearance and composition of the vegetation closely matches the characteristics of the specific grassland habitat type. Indicator species listed by UKHab for the specific grassland habitat type are consistently present.*	This parcel is not a good representation of the habitat type definition found in UKHabs as it has low species diversity with undesirable species and ruderals present.	x

BG5			
Condition Assessment Criteria		**Rationale for Meeting Condition Assessment Criteria**	
	Note: this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.		
B	*Sward height is varied (at least 20% of the sward is less than 7cm and at least 20% of the sward is more than 7cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.*	Sward height is varied due to inundation periods.	✓
C	*Cover of bare ground is between 1% and 5%, including localised areas, for example rabbit warrens.*	Bare ground is present due to seasonal inundation.	✓
D	*Cover of bracken Pteridium aquilinum is less than 20% and cover of scrub (including bramble Rubus fruticosus agg.) is less than 5%*	No bracken or scrub are present.	✓
E	*Combined cover of species indicative of sub-optimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area.* *If any invasive non-native plant species (as listed on Schedule 9 of the Wildlife and Countryside Act) are present, this criterion is automatically failed.*	No signs of harmful management or impacts are present.	✓
F	*There are 10 or more vascular plant species per m² present, including forbs that are characteristic of the habitat type (species indicative of sub-optimal conditions and non-native invasive species cannot contribute towards this count)*	Low species diversity was present with low diversity (less than 10 species present in whole parcel).	x
	Condition: Poor Meets four out of six criteria, however, fails criterion A which is a requirement for reaching Moderate or Good condition.		

Grassland – modified grassland

BG7			
Condition Assessment Criteria		**Rationale for Meeting Condition Assessment Criteria**	
A	*There are 6-8 vascular plant species per m² present, including at least 2 forbs.* **Note - this criterion is essential for achieving Moderate or Good condition.**	Horse grazed paddock with low species diversity dominated by agricultural grasses and meadow buttercup.	x
B	*Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.*	Sward height is consistent and short due to grazing.	x
C	*Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble may be present).* *Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.*	Scrub is not present.	✓
D	*Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.*	No excessive poaching is evident and no other damage is present.	✓
E	*Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).*	Localised patches of bare ground containing hoof prints, however these do not cover over 10% of the grassland.	✓
F	*Cover of bracken is less than 20%.*	Bracken is not present.	✓
G	*There is an absence of invasive non-native plant species (as listed on Schedule 9 of Wildlife and Countryside Act 1981 (as amended)).*	No invasive non-native species are present.	✓
	Condition: Poor Meets five out of seven criteria, however, fails criterion A which is a requirement for reaching Moderate or Good condition.		

BG4			
Condition Assessment Criteria		**Rationale for Meeting Condition Assessment Criteria**	
A	*There are 6-8 vascular plant species per m² present, including at least 2 forbs.* **Note - this criterion is essential for achieving Moderate or Good condition.**	The grassland contains low species diversity with an average of 4 species per *m²*.	x
B	*Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.*	Sward height is consistent and short.	x
C	*Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble may be present).*	Scrub is present but accounts of less than 20% of the total area.	✓

BG4			
Condition Assessment Criteria		**Rationale for Meeting Condition Assessment Criteria**	
	Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.		
D	*Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.*	Limited physical damage is present and accounts for less than 5% of the total area.	✓
E	*Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).*	Localised small patches of bare ground, however these do not cover over 10% of the grassland.	✓
F	*Cover of bracken is less than 20%.*	Bracken is not present.	✓
G	*There is an absence of invasive non-native plant species (as listed on Schedule 9 of Wildlife and Countryside Act 1981 (as amended)).*	No invasive non-native species are present.	✓
	Condition: Poor Meets five out of seven criteria, however, fails criterion A which is a requirement for reaching Moderate or Good condition.		

BG6			
Condition Assessment Criteria		**Rationale for Meeting Condition Assessment Criteria**	
A	*There are 6-8 vascular plant species per m² present, including at least 2 forbs.* **Note - this criterion is essential for achieving Moderate or Good condition.**	The grassland contains low species diversity with an average of 4 species per *m²*.	x
B	*Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.*	Due to areas of localised grazing, the sward height is varied containing taller and shorter patches.	✓
C	*Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble may be present).* *Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.*	Scrub is present in small patches but accounts for less than 20% of the total grassland area.	✓
D	*Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.*	No physical damage is present.	✓
E	*Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).*	Limited and localised small patches of bare ground, however these cover less than 10% of the grassland.	x
F	*Cover of bracken is less than 20%.*	Bracken is not present.	✓

BG6			
Condition Assessment Criteria		**Rationale for Meeting Condition Assessment Criteria**	
G	*There is an absence of invasive non-native plant species (as listed on Schedule 9 of Wildlife and Countryside Act 1981 (as amended)).*	Invasive non-native species are not present.	✓
	Condition: Poor Meets five out of seven criteria, however, fails criterion A which is a requirement for reaching Moderate or Good condition.		

Woodland and forest – other woodland; broadleaved

BW1						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Justification
1	Age distribution of trees	Three age-classes present (young, intermediate and old)	Two age-classes present	One age-class present	3	Saplings, semi-mature, and mature trees are present.
2	Wild, domestic and feral herbivore damage	No significant browsing damage evident in woodland	Evidence of significant browsing pressure is present in 40% or less of whole woodland.	Evidence of significant browsing pressure is present in 40% or more of whole woodland.	3	There is no evidence of browsing damage from wild or domestic herbivores within the woodland
3	Invasive plant species	No invasive species present in woodland	Rhododendron *Rhododendron ponticum* or cherry laurel *Prunus laurocerasus* not present, other invasive species <10% cover	Rhododendron or cherry laurel present or other invasive species >10% cover	3	No invasive non-native species are present.
4	Number of native tree species	Five or more native tree or shrub species found across woodland parcel	Three to four native tree or shrub species found across woodland parcel	Two or less native tree or shrub species across woodland parcel.	3	Thirteen native tree species are found across the woodland parcel, including hawthorn, oak, elm, blackthorn and field maple.
5	Cover of native tree and shrub species	>80% of canopy trees and >80% of understory shrubs are native	50-80% of canopy trees and 50-80% of understory shrubs are native	<50% of canopy trees and <50% of understory shrubs are native	3	>80% of canopy and shrubs are native
6	Open space within woodland	10-20% of woodland has areas of temporary open space. Unless woodland is less than 10ha, in which case 0-20% temporary open space is permitted.	21-40% of woodland has areas of temporary open space.	<10% or >40% of woodland has areas of temporary open space. BUT if woodland <10has <10% temporary open space, please see Good category	1	Very limited open space is present, accounting for <10% of the woodland area.

BW1						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Justification
7	Woodland regeneration	All three classes present in woodland; trees 4-7cm Diameter at Breast height (DBH), saplings and seedlings or advanced coppice regrowth	One or two classes only present in woodland	No classes or coppice regrowth present in woodland	3	All three classes are present in the woodland.
8	Tree health	Tree mortality less than 10%, no pests or diseases and no crown dieback	11% to 25% mortality and/or crown dieback or low-risk pest or disease present	Greater than 25% tree mortality and or any high-risk pest or disease present	3	There are no signs of Ash dieback or other ill health within the woodland and tree mortality is less than 10%.
9	Vegetation and ground flora	Recognisable NVC plant community at ground layer present, strongly characterised by ancient woodland flora specialists	Recognisable woodland NVC plant community at ground layer present	No recognisable woodland NVC plant community at ground layer present	1	The ground flora is dominated by species indicative of nutrient enrichment, including nettles and bramble.
10	Woodland vertical structure	Three or more storeys across all survey plots or a complex woodland	Two storeys across all survey plots	One or less storey across all survey plots	3	There are three storeys present within the woodland
11	Veteran trees	Two or more veteran trees per hectare	One veteran tree per hectare	No veteran trees present in woodland	1	There are no veteran trees present in the woodland
12	Amount of deadwood	50% of all survey plots within the woodland parcels have deadwood, such as standing deadwood, large dead branches and or stems, branch stubs and stumps or an abundance of small cavities	Between 25% and 50% of all survey plots within the woodland parcels have deadwood, such as standing deadwood, large dead branches and or stems, branch stubs and stumps or an abundance of small cavities	Less than 25% of all survey plots within the woodland parcels have deadwood, such as standing deadwood, large dead branches and or stems, branch stubs and stumps or an abundance of small cavities	2	There is some deadwood present within the woodland; however, this is in small amounts.

BW1						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Justification
13	Woodland disturbance	No nutrient enrichment or damaged ground evident	Less than 1 hectare in total of nutrient enrichment across woodland area and or less than 20% of woodland area has damaged ground	More than 1 hectare of nutrient enrichment and or more than 20% of woodland area has damaged ground.	1	Nutrient enrichment is evident.
	Condition: Moderate **Woodland currently has a score of 30 points**					

BW2						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Justification
1	Age distribution of trees	Three age-classes present (young, intermediate and old)	Two age-classes present	One age-class present	2	Young and intermediate trees are present.
2	Wild, domestic and feral herbivore damage	No significant browsing damage evident in woodland	Evidence of significant browsing pressure is present in 40% or less of whole woodland.	Evidence of significant browsing pressure is present in 40% or more of whole woodland.	3	There is no evidence of browsing damage from wild or domestic herbivores within the woodland
3	Invasive plant species	No invasive species present in woodland	Rhododendron *Rhododendron ponticum* or cherry laurel *Prunus laurocerasus* not present, other invasive species <10% cover	Rhododendron or cherry laurel present or other invasive species >10% cover	3	No invasive non-native species are present.
4	Number of native tree species	Five or more native tree or shrub species found across woodland parcel	Three to four native tree or shrub species found across woodland parcel	Two or less native tree or shrub species across woodland parcel.	2	Four native tree species are found across the woodland parcel, including grey and crack willow, aspen and hawthorn.
5	Cover of native tree and shrub species	>80% of canopy trees and >80% of understory shrubs are native	50-80% of canopy trees and 50-80% of understory shrubs are native	<50% of canopy trees and <50% of understory	3	>80% of canopy trees and >80% of understory shrubs are native.

BW2						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Justification
				shrubs are native		
6	Open space within woodland	10-20% of woodland has areas of temporary open space. Unless woodland is less than 10ha, in which case 0-20% temporary open space is permitted.	21-40% of woodland has areas of temporary open space.	<10% or >40% of woodland has areas of temporary open space. BUT if woodland <10has <10% temporary open space, please see Good category	1	Very limited open space is present, accounting for <10% of the woodland area.
7	Woodland regeneration	All three classes present in woodland; trees 4-7cm Diameter at Breast height (DBH), saplings and seedlings or advanced coppice regrowth	One or two classes only present in woodland	No classes or coppice regrowth present in woodland	2	Only two classes are found in the woodland; saplings and young trees.
8	Tree health	Tree mortality less than 10%, no pests or diseases and no crown dieback	11% to 25% mortality and/or crown dieback or low-risk pest or disease present	Greater than 25% tree mortality and or any high-risk pest or disease present	3	There are no signs of Ash dieback or other ill health within the woodland and tree mortality is less than 10%.
9	Vegetation and ground flora	Recognisable NVC plant community at ground layer present, strongly characterised by ancient woodland flora specialists	Recognisable woodland NVC plant community at ground layer present	No recognisable woodland NVC plant community at ground layer present	1	No recognisable woodland NVC plant community at ground layer present as this is dominated by nettle *Urtica dioica*.
10	Woodland vertical structure	Three or more storeys across all survey plots or a complex woodland	Two storeys across all survey plots	One or less storey across all survey plots	2	There are two storeys present within the woodland
11	Veteran trees	Two or more veteran trees per hectare	One veteran tree per hectare	No veteran trees present in woodland	1	There are no veteran trees present in the woodland

BW2						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Justification
12	Amount of deadwood	50% of all survey plots within the woodland parcels have deadwood, such as standing deadwood, large dead branches and or stems, branch stubs and stumps or an abundance of small cavities	Between 25% and 50% of all survey plots within the woodland parcels have deadwood, such as standing deadwood, large dead branches and or stems, branch stubs and stumps or an abundance of small cavities	Less than 25% of all survey plots within the woodland parcels have deadwood, such as standing deadwood, large dead branches and or stems, branch stubs and stumps or an abundance of small cavities	1	There is limited deadwood present within the woodland.
13	Woodland disturbance	No nutrient enrichment or damaged ground evident	Less than 1 hectare in total of nutrient enrichment across woodland area and or less than 20% of woodland area has damaged ground	More than 1 hectare of nutrient enrichment and or more than 20% of woodland area has damaged ground.	1	No nutrient enrichment or damaged ground evident.
	Condition: Poor **Woodland currently has a score of 25 points**					

BW3						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Justification
1	Age distribution of trees	Three age-classes present (young, intermediate and old)	Two age-classes present	One age-class present	2	Young and intermediate trees are present.
2	Wild, domestic and feral herbivore damage	No significant browsing damage evident in woodland	Evidence of significant browsing pressure is present in 40% or less of whole woodland.	Evidence of significant browsing pressure is present in 40% or more of whole woodland.	3	There is no evidence of browsing damage from wild or domestic herbivores within the woodland
3	Invasive plant species	No invasive species present in woodland	Rhododendron *Rhododendron ponticum* or cherry laurel *Prunus laurocerasus* not	Rhododendron or cherry laurel present or other invasive species >10% cover	3	No invasive non-native species are present.

BW3						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Justification
			present, other invasive species <10% cover			
4	Number of native tree species	Five or more native tree or shrub species found across woodland parcel	Three to four native tree or shrub species found across woodland parcel	Two or less native tree or shrub species across woodland parcel.	3	Five or more native tree species are found across the woodland parcel, including silver birch, oak, willow, hawthorn and ash.
5	Cover of native tree and shrub species	>80% of canopy trees and >80% of understory shrubs are native	50-80% of canopy trees and 50-80% of understory shrubs are native	<50% of canopy trees and <50% of understory shrubs are native	3	>80% of canopy trees and >80% of understory shrubs are native.
6	Open space within woodland	10-20% of woodland has areas of temporary open space. Unless woodland is less than 10ha, in which case 0-20% temporary open space is permitted.	21-40% of woodland has areas of temporary open space.	<10% or >40% of woodland has areas of temporary open space. BUT if woodland <10has <10% temporary open space, please see Good category	2	Some areas of open space are present, accounting for 21-40% of the woodland area.
7	Woodland regeneration	All three classes present in woodland; trees 4-7cm Diameter at Breast height (DBH), saplings and seedlings or advanced coppice regrowth	One or two classes only present in woodland	No classes or coppice regrowth present in woodland	3	All three classes present in woodland.
8	Tree health	Tree mortality less than 10%, no pests or diseases and no crown dieback	11% to 25% mortality and/or crown dieback or low-risk pest or disease present	Greater than 25% tree mortality and or any high-risk pest or disease present	3	There are no signs of Ash dieback or other ill health within the woodland and tree mortality is less than 10%.
9	Vegetation and ground flora	Recognisable NVC plant community at ground layer	Recognisable woodland NVC plant community	No recognisable woodland NVC plant community	1	No recognisable woodland NVC plant community at ground layer.

BW3						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Justification
		present, strongly characterised by ancient woodland flora specialists	at ground layer present	at ground layer present		
10	Woodland vertical structure	Three or more storeys across all survey plots or a complex woodland	Two storeys across all survey plots	One or less storey across all survey plots	2	There are two storeys present within the woodland
11	Veteran trees	Two or more veteran trees per hectare	One veteran tree per hectare	No veteran trees present in woodland	1	There are no veteran trees present in the woodland
12	Amount of deadwood	50% of all survey plots within the woodland parcels have deadwood, such as standing deadwood, large dead branches and or stems, branch stubs and stumps or an abundance of small cavities	Between 25% and 50% of all survey plots within the woodland parcels have deadwood, such as standing deadwood, large dead branches and or stems, branch stubs and stumps or an abundance of small cavities	Less than 25% of all survey plots within the woodland parcels have deadwood, such as standing deadwood, large dead branches and or stems, branch stubs and stumps or an abundance of small cavities	1	There is limited deadwood present within the woodland.
13	Woodland disturbance	No nutrient enrichment or damaged ground evident	Less than 1 hectare in total of nutrient enrichment across woodland area and or less than 20% of woodland area has damaged ground	More than 1 hectare of nutrient enrichment and or more than 20% of woodland area has damaged ground.	1	High levels of damaged ground and >1 ha of nutrient enrichment is present.
	Condition: Moderate **Woodland currently has a score of 28 points**					

BW4						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Justification
1	Age distribution of trees	Three age-classes present (young, intermediate and old)	Two age-classes present	One age-class present	1	All trees within the woodland are semi-mature.

BW4						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Justification
2	Wild, domestic and feral herbivore damage	No significant browsing damage evident in woodland	Evidence of significant browsing pressure is present in 40% or less of whole woodland.	Evidence of significant browsing pressure is present in 40% or more of whole woodland.	3	There is no evidence of browsing damage from wild or domestic herbivores within the woodland.
3	Invasive plant species	No invasive species present in woodland	Rhododendron *Rhododendron ponticum* or cherry laurel *Prunus laurocerasus* not present, other invasive species <10% cover	Rhododendron or cherry laurel present or other invasive species >10% cover	3	No invasive plant species were recorded.
4	Number of native tree species	Five or more native tree or shrub species found across woodland parcel	Three to four native tree or shrub species found across woodland parcel	Two or less native tree or shrub species across woodland parcel.	3	More than five native tree species are found across the woodland parcel.
5	Cover of native tree and shrub species	>80% of canopy trees and >80% of understory shrubs are native	50-80% of canopy trees and 50-80% of understory shrubs are native	<50% of canopy trees and <50% of understory shrubs are native	3	All canopy and shrub species are native.
6	Open space within woodland	10-20% of woodland has areas of temporary open space. Unless woodland is less than 10ha, in which case 0-20% temporary open space is permitted.	21-40% of woodland has areas of temporary open space.	<10% or >40% of woodland has areas of temporary open space. BUT if woodland <10has <10% temporary open space, please see Good category	1	There is no open space present.
7	Woodland regeneration	All three classes present in woodland; trees 4-7cm Diameter at Breast height (DBH), saplings and seedlings or	One or two classes only present in woodland	No classes or coppice regrowth present in woodland	1	There are no classes or evidence of coppice regrowth present within the woodland.

BW4						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Justification
		advanced coppice regrowth				
8	Tree health	Tree mortality less than 10%, no pests or diseases and no crown dieback	11% to 25% mortality and/or crown dieback or low-risk pest or disease present	Greater than 25% tree mortality and or any high-risk pest or disease present	3	No tree mortality evident.
9	Vegetation and ground flora	Recognisable NVC plant community at ground layer present, strongly characterised by ancient woodland flora specialists	Recognisable woodland NVC plant community at ground layer present	No recognisable woodland NVC plant community at ground layer present	1	There is no recognisable woodland NVC plant community at ground layer present.
10	Woodland vertical structure	Three or more storeys across all survey plots or a complex woodland	Two storeys across all survey plots	One or less storey across all survey plots	1	There is only one storey present within the woodland.
11	Veteran trees	Two or more veteran trees per hectare	One veteran tree per hectare	No veteran trees present in woodland	3	There are no veteran trees present in the woodland.
12	Amount of deadwood	50% of all survey plots within the woodland parcels have deadwood, such as standing deadwood, large dead branches and or stems, branch stubs and stumps or an abundance of small cavities	Between 25% and 50% of all survey plots within the woodland parcels have deadwood, such as standing deadwood, large dead branches and or stems, branch stubs and stumps or an abundance of small cavities	Less than 25% of all survey plots within the woodland parcels have deadwood, such as standing deadwood, large dead branches and or stems, branch stubs and stumps or an abundance of small cavities	2	There is very little deadwood present within the woodland.
13	Woodland disturbance	No nutrient enrichment or damaged ground evident	Less than 1 hectare in total of nutrient enrichment across woodland area and or less than 20% of woodland	More than 1 hectare of nutrient enrichment and or more than 20% of woodland area	3	None of the woodland area has damaged ground.

BW4						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Justification
			area has damaged ground	has damaged ground.		
	Condition: Moderate **Woodland currently has a score of 28 points**					

Heathland and scrub – willow scrub

	Condition Assessment Criteria	Rationale for Meeting Condition Assessment Criteria	
A	The scrub is a good representation of the habitat type it has been identified as, based on its UKHab description (where in its natural range). The appearance and composition of the vegetation closely matches the characteristics of the specific scrub type. At least 80% of scrub is native, and there are at least three native woody species, with no single species comprising more than 75% of the cover (excluding exceptions).	The scrub was dominated by a single willow species, with all of the scrub a uniform age.	x
B	Seedlings, saplings, young shrubs and mature (or ancient/veteran) shrubs are all present.	Only young shrubs and saplings are present.	x
C	There is an absence of invasive non-native plant species (listed on Schedule 9 of WCA) and species indicative of sub-optimal condition make up less than 5% of ground cover.	No invasive non-native species were recorded.	✓
D	The scrub has a well-developed edge with scattered scrub and tall grassland and/or forbs present between the scrub and adjacent habitat.	The grass bordering the scrub is rougher than the wider field. The area contains open areas within the scrub that provide edge habitat.	✓
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	There are clearings in present in the scrub.	✓
*	**Target Condition: Moderate** Passes three out of five condition criteria.		

Heathland and scrub – mixed scrub

BS1			
Condition Assessment Criteria		**Rationale for Meeting Condition Assessment Criteria**	
A	The scrub is a good representation of the habitat type it has been identified as, based on its UKHab description (where in its natural range). The appearance and composition of the vegetation closely matches the characteristics of the specific scrub type. At least 80% of scrub is native, and there are at least three native woody species, with no single species comprising more than 75% of the cover (excluding exceptions).	The scrub is a narrow belt formed from an overgrown hedge. While five woody species are present, it is not a good example of the habitat type.	x
B	Seedlings, saplings, young shrubs and mature (or ancient/veteran) shrubs are all present.	Mature trees are present, as well as younger shrubs.	✓
C	There is an absence of invasive non-native plant species (listed on Schedule 9 of WCA) and species indicative of sub-optimal condition make up less than 5% of ground cover.	No invasive non-native species were recorded.	✓
D	The scrub has a well-developed edge with scattered scrub and tall grassland and/or forbs present between the scrub and adjacent habitat.	There is no gradual edge as the habitat is bordered by short grassland.	x
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	There is limited open space within the dense scrub.	x
*	**Target Condition: Moderate** Passes two out of five condition criteria.		

BS2			
Condition Assessment Criteria		**Rationale for Meeting Condition Assessment Criteria**	
A	The scrub is a good representation of the habitat type it has been identified as, based on its UKHab description (where in its natural range). The appearance and composition of the vegetation closely matches the characteristics of the specific scrub type. At least 80% of scrub is native, and there are at least three native woody species, with no single species comprising more than 75% of the cover (excluding exceptions).	The scrub is a good representation of its UK Hab type, with a range of native shrubby species.	✓

B	Seedlings, saplings, young shrubs and mature (or ancient/veteran) shrubs are all present.	Mature trees are present, as well as younger shrubs.	✓
C	There is an absence of invasive non-native plant species (listed on Schedule e9 of WCA) and species indicative of sub-optimal condition make up less than 5% of ground cover.	No invasive non-native species were recorded.	✓
D	The scrub has a well-developed edge with scattered scrub and tall grassland and/or forbs present between the scrub and adjacent habitat.	There is no gradual edge as the habitat is bordered by the road to the south and short grassland to the north.	x
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	The mosaic with the grassland means open spaces are present.	✓
*	**Condition: Moderate** Passes four out of five condition criteria.		

BS3			
	Condition Assessment Criteria	**Rationale for Meeting Condition Assessment Criteria**	
A	The scrub is a good representation of the habitat type it has been identified as, based on its UKHab description (where in its natural range). The appearance and composition of the vegetation closely matches the characteristics of the specific scrub type. At least 80% of scrub is native, and there are at least three native woody species, with no single species comprising more than 75% of the cover (excluding exceptions).	The scrub is a poor representation of its UK Hab type, being a small managed strip dominated largely by willow.	x
B	Seedlings, saplings, young shrubs and mature (or ancient/veteran) shrubs are all present.	All scrub is of a similar age with no variation.	x
C	There is an absence of invasive non-native plant species (listed on Schedule e9 of WCA) and species indicative of sub-optimal condition make up less than 5% of ground cover.	No invasive non-native species were recorded.	✓
D	The scrub has a well-developed edge with scattered scrub and tall grassland and/or forbs present between the scrub and adjacent habitat.	There is no gradual edge as the habitat is bordered by short grazed grassland.	x
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	The parcel of scrub is too small to have any clearings, glades or rides present.	x
*	**Condition: Poor** Passes one out of five condition criteria.		

Pond

	Condition Assessment Criteria	Rationale for Meeting Condition Assessment Criteria	
A	*The pond is of good water quality, with clear water (low turbidity) indicating no obvious signs of pollution. Turbidity is acceptable if the pond is grazed by livestock.*	Water quality appears to be low, likely due to the run off present from the nearby road.	x
B	*There is semi-natural habitat (moderate distinctiveness or above) completely surrounding the pond, for at least 10m from the pond edge for its entire perimeter.*	Woodland surrounds the pond.	✓
C	*Less than 10% of the water surface is covered with duckweed Lemna spp. or filamentous algae*	Less than 10% of the water surface is covered with duckweed.	✓
D	*The pond is not artificially connected to other waterbodies, e.g. agricultural ditches or artificial pipework.*	The pond has likely been created as part of works to the connected watercourse or the nearby road embankment.	x
E	*Pond water levels can fluctuate naturally throughout the year. No obvious artificial dams, pumps or pipework.*	No pumps, dams or pipework present so pond levels can fluctuate naturally.	✓
F	*There is an absence of listed non-native plant and animal species.*	No undesirable non-native species present.	✓
G	*The pond is not artificially stocked with fish. If the pond naturally contains fish, it is a native fish assemblage at low densities.*	The pond does not contain any fish.	✓
	Condition: Moderate Meets five out of seven criteria		

Individual trees – rural tree (T7)

	Condition Assessment criteria	Rationale for Meeting Condition Assessment Criteria	
A	*More than 70% of trees are native species.*	The tree is a native pedunculate oak *Quercus robur*.	✓
B	*Tree canopy is predominantly continuous with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide.*	Individual trees automatically pass this criterion.	✓
C	*More than 50% of trees are mature or veteran.*	The tree is mature.	✓
D	*There is little or no evidence of an adverse impact on tree health by anthropogenic activities such as vandalism or herbicide use. There is no current regular pruning regime so the trees retain >75% of expected canopy for their age range and height.*	No evidence of pruning or negative anthropogenic impacts were observed.	✓
E	*Management regime has encouraged micro habitat sites for birds, mammals and insects e.g. presence of deadwood, cavities or loose bark etc.*	The tree supports ecological niches including potential for invertebrates.	✓
F	*More than 20% of the tree canopy area is oversailing vegetation beneath.*	More than 20% of the tree canopy is oversailing vegetation.	✓
	Condition: Good Six criteria out of six met.		

Bare ground

BU1, BBG1, BBG2			
Condition Assessment criteria		**Rationale for Meeting Condition Assessment Criteria**	
A	*Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.*	Compacted bare earth around stables or access tracks between fields	x
B	*The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.*	Negligible vegetation present	x
C	*"Invasive non-native plant species (listed on Schedule 9 of WCA) and others which are to the detriment of native wildlife (using professional judgement) cover less than 5% of the total vegetated area3.*	No invasive non-native plant species present	✓
	Condition: Poor One criterion out of three met.		

Current hedgerows

Species-rich native hedgerow with trees – associated with bank or ditch

	Condition Assessment criteria	Rationale for Meeting Condition Assessment Criteria	
A1	*Height: Greater than 1.5m average along length*	Greater than 1.5m height	✓
A2	*Width: Greater than 1.5m average along length*	Greater than 1.5m	✓
B1	*Gap - hedge base: Gap between ground and base of canopy less than 0.5m for more than 90% of length*	There is a no gap between the ground and base of canopy along the majority of the hedgerow.	✓
B2	*Gap - hedge canopy continuity: Gaps make up less than 10% of total length and no canopy gaps greater than 5m*	No gaps present.	✓
C1	*Undisturbed ground and perennial vegetation: Greater than 1m width of undisturbed ground with perennial herbaceous vegetation for more than 90% of length (measured from outer edge of hedgerow), is present on at least one side of the hedge*	Grassland is present to the north of the hedgerow.	✓
C2	*Undesirable perennial vegetation: Plant species indicative of nutrient enrichment of soils dominate less than 20% cover of the area of undisturbed ground*	The ground layer is dominated by common nettle.	x
D1	*Invasive and neophyte species: More than 90% of the hedgerow and undisturbed ground is free of invasive non-native and neophyte species*	No invasive non-native species recorded.	✓
D2	*Current damage: More than 90% of the hedgerow or undisturbed ground is free of damage caused by human activities*	Some of the trees have been pruned.	x
	Condition: Good Fails two attributes, but these are not in the same functional group.		

Hedgerow – native hedgerow with trees

	Condition Assessment criteria	Rationale for Meeting Condition Assessment Criteria	
A1	*Height: Greater than 1.5m average along length*	Greater than 1.5m height	✓
A2	*Width: Greater than 1.5m average along length*	Greater than 1.5m width	✓
B1	*Gap - hedge base: Gap between ground and base of canopy less than 0.5m for more than 90% of length*	There is a no gap between the ground and base of canopy along the majority of the hedgerow.	✓
B2	*Gap - hedge canopy continuity: Gaps make up less than 10% of total length and no canopy gaps greater than 5m*	No gaps present.	✓
C1	*Undisturbed ground and perennial vegetation: Greater than 1m width of undisturbed ground with perennial herbaceous vegetation for more than 90% of length (measured from outer edge of hedgerow), is present on at least one side of the hedge*	Grassland is present either side of the hedgerow.	✓
C2	*Undesirable perennial vegetation: Plant species indicative of nutrient enrichment of soils dominate less than 20% cover of the area of undisturbed ground*	The ground layer is dominated by common nettle.	x
D1	*Invasive and neophyte species: More than 90% of the hedgerow and undisturbed ground is free of invasive non-native and neophyte species*	No invasive non-native species recorded.	✓
D2	*Current damage: More than 90% of the hedgerow or undisturbed ground is free of damage caused by human activities*	Some of the trees have been pruned.	x
E1	*Tree class: There is more than one age-class (or morphology) of tree present (for example: young, mature, veteran and/or ancient) and there is on average at least one mature, ancient or veteran tree present per 20-50m of hedgerow.*	There are mature trees and younger specimens present.	✓
E2	*Tree health: At least 95% of hedgerow trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.*	There is some tree mortality but this is less than 10%.	✓
*	**Condition: Good** Fails two attributes, but these are not in the same functional group.		

6.2. Appendix 2: Statutory Biodiversity Metric calculator

As attachment.

6.3. Appendix 3: UK Habitat Classification species list

Please note that these lists are intended to be incidental records and do not constitute a full botanical survey of the site. Relative abundance is given using the DAFOR scale.

Other neutral grassland (g3c) - field margins

Common Name	Systematic Name	Relative abundance
Cow parsley	*Anthriscus sylvestris*	D
Cock's-foot	*Dactylis glomerata*	O
Common nettle	*Urtica dioica*	O
Creeping soft-grass	*Holcus mollis*	O
Smooth-stalked meadow grass	*Poa pratensis*	O
Sweet vernal grass	*Anthoxanthum odoratum*	O
Barren brome	*Bromus sterilis L*	R
Bramble sp.	*Rubus fruticosus*	R
Bulbous buttercup	*Ranunculus bulbosus*	R
Bush vetch	*Vicia sepium*	R
Cleavers	*Galium aparine*	R
Cranesbill sp	*Geranium sp.*	R
Crested hair grass	*Koeleria macrantha*	R
Creeping buttercup	*Ranunculus repens*	R
Creeping thistle	*Cirsium arvense*	R
Dandelion sp.	*Taraxacum sp.*	R
Dock sp.	*Rumex sp.*	R
Hogweed	*Heracleum sphondylium*	R
Non-native bluebell	*N/A*	R
Lesser celandine	*Ficaria verna*	R
Lesser hawkbit	*Leontodon saxatilis Lam*	R
Red campion	*Silene dioica*	R
White clover	*Trifolium repens*	R
White dead-nettle	*Lamium album*	R

Common Name	Systematic Name	Relative abundance
Wood forget-me-not	*Myosotis sylvatica*	R

Other neutral grassland (g3c) - public access field

Common Name	Systematic Name	Relative abundance
Greater plantain	*Plantago major*	A
Creeping thistle	*Cirsium arvense*	F
Sweet vernal grass	*Anthoxanthum odoratum*	F
Smooth-stalked meadow grass	*Poa pratensis*	F
Creeping soft-grass	*Holcus mollis*	O
Cow parsley	*Anthriscus sylvestris*	O
Yorkshire-fog	*Holcus lanatus*	O
Ribwort plantain	*Plantago lanceolata*	O
Barren brome	*Bromus sterilis L*	R
Bramble sp.	*Rubus fruticosus*	R
Bulbous buttercup	*Ranunculus bulbosus*	R
Bush vetch	*Vicia sepium*	R
Broad-leaved dock	*Rumex obtusifolius*	R
Common chickweed	*Stellaria media*	R
Euphorbia sp.	*Euphorbia sp.*	R
Hairy tare	*Vicia hirsuta*	R
Hop trefoil	*Trifolium campestre*	R
Hogweed	*Heracleum sphondylium*	R
Lesser hawkbit	*Leontodon saxatilis Lam*	R
Red clover	*Trifolium pratense*	R
Yarrow	*Achillea millefolium*	R

Other neutral grassland (g3c) – large central field

Common Name	Systematic Name	Relative abundance
Sweet vernal grass	*Anthoxanthum odoratum*	D
Meadow buttercup	*Ranunculus acris*	A

Common Name	Systematic Name	Relative abundance
Broad-leaved dock	*Rumex obtusifolius*	O
Common sorrel	*Rumex acetosa*	O
Red clover	*Trifolium pratense*	O
Creeping buttercup	*Ranunculus repens*	R
Creeping soft-grass	*Holcus mollis*	R
Crested hairgrass	*Koeleria macrantha*	R
Broad-leaved dock	*Rumex obtusifolius*	R
Bush vetch	*Vicia sepium*	R
Dandelion sp.	*Taraxacum sp.*	R
Goat's-beard	*Aruncus dioicus*	R
Hogweed	*Heracleum sphondylium*	R
Mouse-ear chickweed	*Rumex obtusifolius*	R

Other neutral grassland (g3c) – north-western field

Common Name	Systematic Name	Relative abundance
Sweet vernal grass	*Anthoxanthum odoratum*	D
Common trefoil	*Lotus corniculatus*	F
Meadow vetchling	*Lathyrus pratensis*	F
Red clover	*Trifolium pratense*	O
Common sorrel	*Rumex acetosa*	R
Common vetch	*Vicia sativa*	R
Chickweed	*Stellaria media agg.*	R
Crested dog's tail	*Cynosurus cristatus*	R
Dandelion sp.	*Taraxacum*	R
Germander speedwell	*Veronica chamaedrys*	R
Hogweed	*Heracleum sphondylium*	R
Meadow buttercup	*Ranunculus acris*	R
Reed grass	*Calamagrostis sp.*	R
Ribwort plantain	*Plantago lanceolata*	R

Common Name	Systematic Name	Relative abundance
Yorkshire-fog	*Holcus lanatus*	R

Modified grassland (g4)

Common Name	Systematic Name	Relative abundance
Sweet vernal grass	*Anthoxanthum odoratum*	D
Fescue sp.	*Festuca sp.*	D
Chickweed	*Stellaria media agg.*	O
Meadow buttercup	*Ranunculus acris*	R
Ribwort plantain	*Plantago lanceolata*	R

Native hedgerow withy trees (h2a6)

Common Name	Systematic Name	Relative abundance
Persian ivy	*Hedera colchica*	D
Hawthorn	*Crataegus monogyna*	F
Ash	*Fraxinus excelsior*	R
Alder	*Alnus glutinosa*	R
Bramble	*Rubus fruticosus*	R
Holly	*Ilex aquifolium*	R

Species-rich native hedgerow with trees associated with a bank or ditch (h2a5)

Common Name	Systematic Name	Relative abundance
Ash	*Fraxinus excelsior*	F
Bramble	*Rubus fruticosus*	F
Hawthorn	*Crataegus monogyna*	F
Blackthorn	*Prunus spinosa*	O
Elder	*Sambucus nigra*	R
Holly	*Ilex aquifolium*	R
Oak	*Quercus sp.*	R

Woodland 1 - north-south belt

Common Name	Systematic Name	Relative abundance
Common nettle	*Urtica dioica*	D
Cleavers	*Galium aparine*	A
Cow parsley	*Anthriscus sylvestris*	A
Hawthorn	*Crataegus monogyna*	A
Garlic mustard	*Alliaria petiolata*	A
Alder	*Alnus glutinosa*	F
Ash	*Fraxinus excelsior*	F
Blackthorn	*Prunus spinosa*	F
Elm	*Ulmus minor sensu Stace*	F
Field maple	*Acer campestre*	F
Oak	*Quercus sp.*	F
Bramble	*Rubus fruticosus*	R
Dog rose	*Rosa canina*	R
Elder	*Sambucus nigra*	R
Hazel	*Corylus avellana*	R
Holly	*Ilex aquifolium*	R
Poplar sp.	*Populus sp.*	R
Lords-and-ladies	*Arum maculatum*	R

Woodland 2 - east-west belt

Common Name	Systematic Name	Relative abundance
Blackthorn	*Prunus spinosa*	D
Bramble	*Rubus fruticosus*	O
Greater stitchwort	*Stellaria holostea*	O
Hawthorn	*Crataegus monogyna*	O
Elder	*Sambucus nigra*	R
Gorse	*Ulex europaeus*	R
Hazel	*Corylus avellana*	R

Common Name	Systematic Name	Relative abundance
Holly	*Ilex aquifolium*	R
Oak	*Quercus sp.*	R

Woodland 3 - east and west of watercourse in the west

Common Name	Systematic Name	Relative abundance
Aspen	*Populus tremula*	D
Willow	*Salix sp.*	D
Common nettle	*Urtica dioica*	D
Hawthorn	*Crataegus monogyna*	R

Woodland 4 - on road embankment to the north of A45

Common Name	Systematic Name	Relative abundance
Silver birch	*Betula pendula*	D
Willow	*Salix sp.*	O
Oak	*Quercus sp.*	A
Ash	*Fraxinus excelsior*	A
Hawthorn	*Crataegus monogyna*	A
Germander speedwell	*Veronica chamaedrys*	R
Ground ivy	*Glechoma hederacea*	R
Forget-me-not sp.	*Myosotis sp.*	R

Woodland 5 – south-eastern corner

Common Name	Systematic Name	Relative abundance
Cow parsley	*Anthriscus sylvestris*	F
Garlic mustard	*Alliaria petiolata*	F
Non-native oak	*N/A*	F
Alder	*Alnus glutinosa*	R
Ash (sapling)	*Fraxinus excelsior*	R
Cleavers	*Galium aparine*	R
Hawthorn	*Crataegus monogyna*	R

Common Name	Systematic Name	Relative abundance
Hogweed	*Heracleum sphondylium*	R

Mixed scrub - belts across central fields

Common Name	Systematic Name	Relative abundance
Goat willow	*Salix caprea*	D
Bramble	*Rubus fruticosus*	O
Ash	*Fraxinus excelsior*	A
Blackthorn	*Prunus spinosa*	R
Crack willow	*Salix fragilis*	R
Gorse	*Ulex europaeus*	R
Hawthorn	*Crataegus monogyna*	R
Oak	*Quercus sp.*	R
Silver birch	*Betula pendula*	R

Mixed scrub - south-west corner

Common Name	Systematic Name	Relative abundance
Oak	*Quercus sp.*	D
Goat willow	*Salix caprea*	F
Ash	*Fraxinus excelsior*	O
Blackthorn	*Prunus spinosa*	O
Bramble	*Rubus fruticosus*	O
Hawthorn	*Crataegus monogyna*	O
Gorse	*Ulex europaeus*	R

Willow scrub

Common Name	Systematic Name	Relative abundance
Goat willow	*Salix caprea*	D
Creeping thistle	*Cirsium arvense*	A
Lesser pond-sedge	*Carex acutiformis*	F
Creeping buttercup	*Ranunculus repens*	F

Common Name	Systematic Name	Relative abundance
Dog rose	*Rosa canina*	O
Oak (sapling)	*Quercus sp.*	R

6.4. Appendix 4: Site photographs

Photograph 1: Other neutral grassland (g3c)- eastern field

Photograph 2: Other neutral grassland (g3c)- field margins

Photograph 3: Other neutral grassland (g3c)

Photograph 4: Other neutral grassland (g3c)

Photograph 5: Modified grassland (g4)

Photograph 6: Mixed scrub (h3h)

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Photograph 13: Species-rich native hedgerow with trees (h2a5)

Photograph 14: Species-rich native hedgerow (h2a5)

Photograph 15: Other standing water (r1g)

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Photograph 18: Wet depression dominated by rushes

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Designated Sites Review

Land off London Road, Ryton-on-Dunsmore

Site	*Land off London Road, Ryton-on-Dunsmore*
Project number	*173425*
Client name / Address	*Tarmac Trading Ltd, Ground Floor T3 Trinity Park, Bickenhill Lane, Birmingham, United Kingdom, B37 7ES*

Version number	**Date of issue**	**Revisions**
1.0	*May 2025*	*Original*

Author(s)	[redacted]	[redacted]
Reviewed by	[redacted]	
Contact	[redacted]	

Declaration of compliance

The information which we have provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

MKA Ecology Ltd is a CIEEM Registered Practice. This means that MKA Ecology Ltd are formally recognised for high professional standards, working at the forefront of our profession.

CONTENTS

1. INTRODUCTION

1.1. Aims and scope of assessment

This document has been produced to review the designated sites located within and in close proximity to Land off London Road, Ryton-on-Dunsmore, assess any potential impact pathways, and if the development has the potential to impact on the designated sites' biological features.

1.2. Site description and context

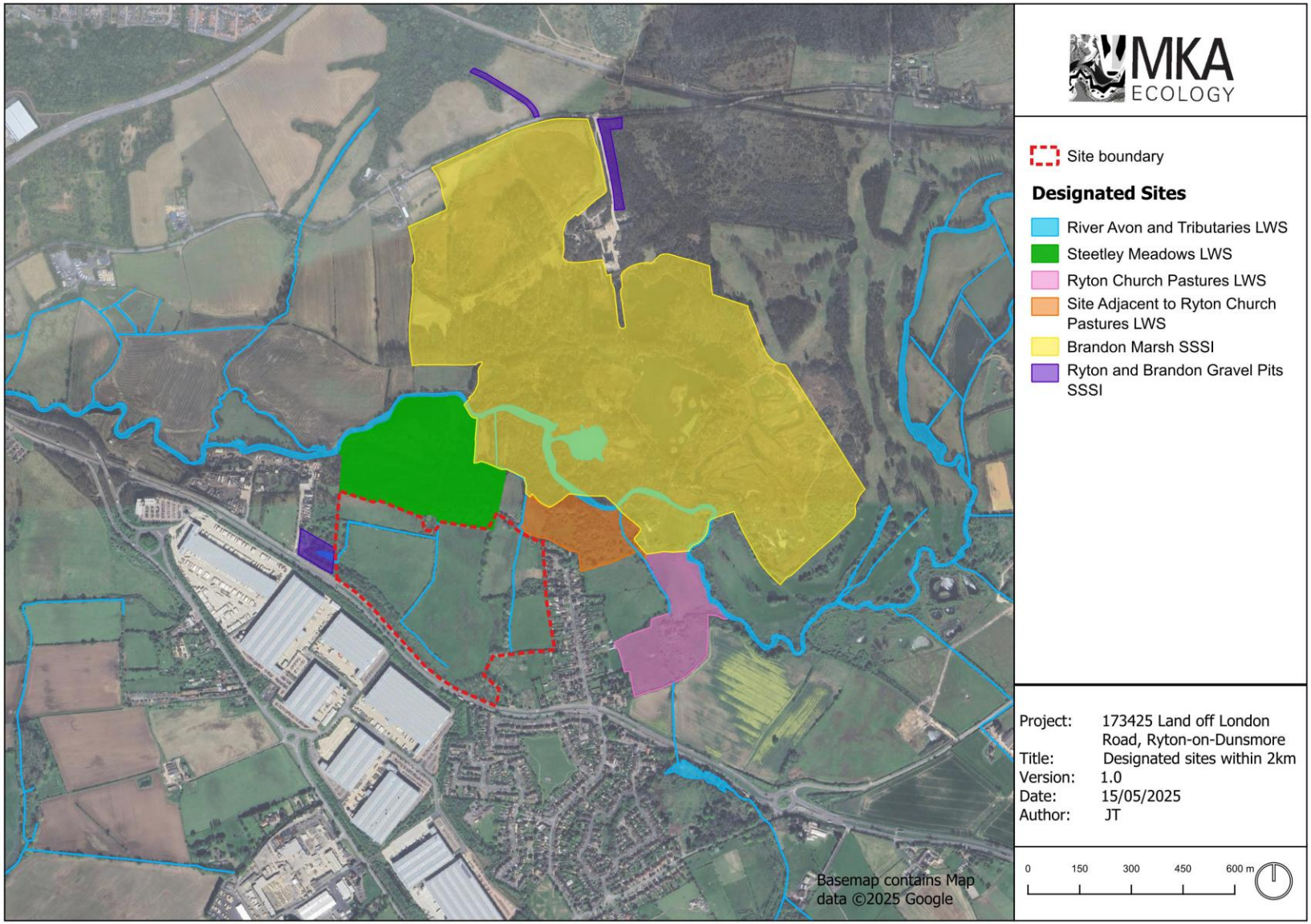
The Site is located in the village of Ryton-on-Dunsmore, 5km south-east of Coventry. It falls under the jurisdiction of Rugby Borough Council, covers an area of 23ha and is centred around grid reference SP 38189 74818. Habitats present include other neutral grassland, modified grassland, woodland, mixed scrub, willow scrub, ditches, river and native species-rich hedgerows. The east of the Site is publicly accessible via public footpaths; however, the majority of the Site is private access only.

Figure 1 shows the Site and the designated sites considered within this initial assessment.

1.3. Proposed development

The proposed development is for a commercial development comprising four larger scale and three smaller scale industrial units with associated access road and parking. A new park and open space for visitors is proposed in the east of the development. This location is being promoted for selection within the emerging Local Plan.

Figure 1 – Location of designated sites



DESIGNATED SITES DESCRIPTIONS

1.4. Ryton and Brandon Gravel Pits SSSI

The Ryton and Brandon Gravel Pits Site of Special Scientific Interest (SSSI) is designated for its geological features, showing important fluvial sequence. The SSSI is 1.94ha, centred on OS grid reference (OSGR) SP 382 756, and is located 5m west of the site. The citation is as follows;

'These three sections provide important exposures which link the Quaternary fluvial sequence associated with the present drainage of the area (i.e. terraces of the River Avon) with an earlier system having no relationship to present topography. The two most southern sections show Avon Terrace 4 gravels overlying Baginton Gravel.'

The key features of the SSSI are as follows;

- ED - Quaternary of Midlands - Avon

Two units of the SSSI are in unfavourable – declining condition, with one currently in favourable condition. These condition assessments are focussed on the geological interest of the SSSI (Quaternary interest features) and not the site's biological interest.

1.5. Brandon Marsh SSSI

Brandon Marsh Site of Special Scientific Interest is designated for its biological features. The SSSI is 92.57ha and is centred on OSGR SP 386 754. The SSSI is 130m north of the site. The citation is as follows;

'Brandon Marsh is a diverse complex of flooded gravel pits, fen and scrub lying adjacent to the River Avon in central Warwickshire. The site has developed from an area of colliery subsidence and flooded meadows which was worked for sand and gravel creating additional pools and ditches. It is a good example of open water with surrounding fen which is an uncommon habitat in Warwickshire. Brandon Marsh is also of regional importance for several species of breeding and wintering birds.

The open waters are moderately eutrophic (nutrient rich) but not floristically diverse. Inundation communities occur in the marginal zone around the pools and are dominated by toad rush *Juncus bufonius*, amphibious bistort *Polygonum amphibium* or common spikerush *Eleocharis palustris*. These give way to fen vegetation which is both species-rich and very variable, consisting of a mixture of reed sweet-grass *Glyceria maxima*, reed canarygrass *Phalaris arundinacea*, reedmace *Typha latifolia* and common reed *Phragmites australis* with abundant gipsywort *Lycopus europaeus*, purple loosestrife *Lythrum salicaria* and sedges *Carex acutiformis C. riparia and C. paniculata*. The marsh has been

colonised by willow *Salix spp*., silver birch *Betula pendula* alder *Alnus glutinosa* and hawthorn *Crataegus monogyna*. There are also two copses with mature oak *Quercus robur* and sycamore *Acer pseudoplatanus*. Much of the remainder of the site is composed of a variety of grassland and ruderal communities. The area known as the Newlands is an extensive stand of damp unimproved neutral grassland with species such as common spotted-orchid *Dactylorhiza fuchsii* and floating sweet-grass *Glyceria fluitans* and also an area of acidic marshy grassland with abundant rushes *Juncus effusus, J. articulatus and J. conglomeratus*.

The extensive network of pools, marshes and scrub supports a wide range of breeding and wintering birds. Amongst the water birds which breed regularly are grebe, ruddy duck, little ringed plover and kingfisher as well as occasional teal and gadwall. In the adjacent scrub, grassland and reeds there are good numbers of breeding warblers, including reed warbler (50 pairs), and grasshopper warbler, in addition to redshank and snipe. Brandon Marsh is an important passage and wintering ground for many waders and waterfowl. Large numbers of teal (up to 400) overwinter together with wigeon, pintail, redshank and snipe. Tens of thousands of hirundines roost in the reeds in autumn. Short-eared owls and hen harriers frequent the site in winter.

The invertebrate fauna of this site is particularly rich especially the aquatic species found in the pools and ditches.'

The key features of the SSSI are as follows;

- Assemblages of breeding birds - Lowland open waters and their margins

The feature of the SSSI, assemblages of breeding birds, is in favourable condition. Six units of the SSSI are in favourable condition (standing open water and canals and Fen, marsh and swamp – lowland), and one unit (standing open water and canals) is in unfavourable-recovering condition.

1.6. River Avon and Tributaries LWS

The River Avon and Tributaries is a Local Wildlife Site (LWS) designated for its biological features. The LWS is a varied section of river, located approximately 100m to the north of the site. A number of small tributaries of the River Avon are present within the proposed development site. The OSGR is SP 381 753. The citation is as follows;

'The River Avon is a varied section of river with a variety of features, with some stretches in an asymmetrical flood plain with steep banks on one bank. Features include eroding and stable earth cliffs, mid-point bars, islands, riffles and pools. Otter *Lutra lutra,* water vole *Arvicola amphibius* have been recorded on the River Avon and appear to use the river and tributaries in the Brandon Marsh and Ryton

area. Great crested newt *Triturus cristatus*, grass snake *Natrix Helvetica* and other notable species of amphibians have also been recorded in the immediate area around Brandon Marsh'.

The key features of the LWS are as follows;

- Hydrological features;
- Protected and notable species.

1.7. Steetley Meadows LWS

The Steetley Meadows LWS is designated for its biological features. It is located immediately north of the site and is approximately 12.53ha and is centred on OSGR SP 380 751. The citation is as follows;

'A complex block of semi-improved grassland with woodland and a large waterbody, on the former gravel extraction site. Currently managed as a privately-admissioned country park. Tormentil *Potentilla erecta*, marsh ragwort *Jacobaea aquatica* and heath speedwell *Veronica officinalis* were recorded on site. These species are listed as Near-threatened in A Vascular Plant Red List for England. The site is used for breeding by many birds including buzzard *Buteo buteo*, *Cuculus canorus*, green and great spotted woodpeckers *Picus viridis*, *Dendrocopos major*, reed bunting *Emberiza schoeniclus*, dunnock *Prunella modularis* and many others. The lake provides good breeding habitat for dragonflies. Emperor *Anax imperator*, black-tailed skimmer *Orthetrum cancellatum*, azure *Coenagrion puella* and four-spotted chaser *Libellula quadrimaculata* were noted.

The key features of the LWS are as follows;

- Grassland, woodland and standing water.

1.8. Ryton Church Pastures LWS

The Ryton Church Pastures LWS is designated for its biological features. It is located 250m to the east of the site, is 6.82ha and is centred on OSGR SP 388 746. The citations is as follows;

'This site includes two fields of species rich, semi-improved grassland, some of which is on probable medieval ridge and furrow. There are a number of thick hedges bordering the area and a stream splits the site at the bottom of a steep sided valley. The site includes a flooded area of pond and marsh, of which the former is silting up'.

The key features of the LWS are as follows;

- Grassland, hedgerows and watercourses.

2. IDENTIFICATION OF POTENTIAL IMPACT PATHWAYS

2.1. Ryton and Brandon Gravel Pits SSSI

English Nature (2004) state in their assessment of management of this SSSI that 'many disused quarries need active management to main expose of the important geological features'. Management usually involves periodic clearance of vegetation and rock debris. Vegetation growth is a particular problem for geological conservation in many inland disused quarries.

It is important to note that there will be no direct impacts on the integrity of the SSSI features as part of the proposed development. The following impact pathways have been identified as ways in which the proposed development may have impact on Ryton and Brandon Gravel Pits SSSI.

Hydrological and geomorphological impacts

There is hydrological connectivity between the site and the SSSI. Were the proposed development to alter this regime, this could have a detrimental effect by altering the natural processes that occur. This would impact the geological features of the site for example hydrological changes, sedimentation or erosion.

Air quality impacts

Whilst it is likely that there will be increased vehicle movements close to the SSSI. These vehicle emissions are unlikely to have an effect on the key geological features of the SSSI.

Recreational pressure

The SSSI is located immediately adjacent to the site, however, there are no public footpaths that pass through or adjacent to the SSSI. The A45 is immediately to the south of the SSSI and site, and a sewage treatment works is present to the west of the SSSI, which would limit access from these directions. Whilst walkers may be able to access the SSSI from the north or east, proposed screening in the development scheme would restrict and discourage access via these routes. Recreational impacts are unlikely to have an effect on the key geological features of the SSSI. Furthermore the type of development is unlikely to significantly increase the number of recreational visits to local designated sites.

2.2. Brandon Marsh SSSI, LWS

English Nature (2005) state in their assessment of management of this SSSI that 'the habitats within this site are highly sensitive to inorganic fertilisers and pesticides, applications of which should be

avoided both within the site itself and in adjacent surrounding areas. Herbicides may be useful in targeting certain invasive species, but should be used with extreme care. Access to this site, and any recreational activities within, may also need to be managed.' Therefore, it is right to consider impacts from actions that occur outside the SSSI, and that if these restrict the natural processes that occur at the SSSI they may damage the features of the site.

The site is particularly good for invertebrates and birds, with the latter including a variety of breeding waders. The site is the county stronghold for Cetti's warbler *Cettia cetti* and the reedbed is one of two regular sites in the county for overwintering bittern *Botaurus stellaris*.

It is important to note that there will be no direct impacts on the integrity of the SSSI features as part of the proposed development. The following impact pathways have been identified as ways in which the proposed development may have a detrimental impact on Brandon Marsh SSSI.

Hydrological and geomorphological impacts

The hydrological regime at the SSSI is a key feature of the site. There is hydrological connectivity between the site and Brandon Marsh SSSI. The proposed development is for B8 employment development (commercial development). Were the proposed development to alter this regime this could cause a detrimental effect by altering the natural processes that occur at the SSSI. This may alter the biological interest of the site through changing hydrological regimes, for example areas of open water and marsh drying out. There is also a risk of impact from pollution moving from the proposed development to the SSSI through hydrological channels.

Air quality impacts

There is likely to be a net increase in vehicle movements close to the SSSI. Construction traffic may also result in further vehicle movements during the construction phase. Vehicle emissions can have a detrimental impact on the biological features of the SSSI through enhanced deposition of nitrogen and ammonia. This deposition can alter the plant communities that are present.

Recreational pressure

The proposed development is commercial and may result in a net increase in visitors to the SSSI. Walkers would need to cross Redland Lane and there is potential to access the SSSI via a track to the north, a distance of approximately 200m. However, the provision of open space within the proposed development for visitors provides alterative amenity space in the local area. Furthermore the type of development is unlikely to significantly increase the number of recreational visits to local designated sites.

Recreational pressures can result in a number of impacts. Visitor pressure can result in trampling of ground flora, compaction of ground and damage to ground structure during wet periods. Human presence can also result in disturbance of species within the habitats of the SSSI, for example nesting

and/ or wintering birds. Walkers with dogs can result in addition impacts. These include nutrient deposition through faeces and urine, which can alter plant communities. Dogs which are not under control and off the lead can have detrimental impacts on nesting birds during the breeding season. It is important to note that many water bird species nest at, or close to ground level, and not with the trees. Dogs accessing waterbodies can result in bankside erosion, and dogs accessing water can also introduce pesticides via flea treatments which can impact aquatic invertebrate communities. Closely associated with increased recreation are further impacts such as littering and vandalism. An increase in visitors to the site may result in further littering.

2.3. River Avon and Tributaries LWS

It is assumed that there will be no direct impacts on the River Avon as part of the proposed development and that features within the development site will be retained and protected. The following impact pathways have been identified as ways in which the proposed development may have a detrimental impact on the River Avon and Tributaries LWS.

Hydrological and geomorphological impacts

Small tributaries of the River Avon are located within the site, therefore there is direct hydrological connectivity between the site and the River Avon.

Construction activities have the potential to have a detrimental direct and indirect effect on the key features of the LWS via damage to these watercourses, loss of habitat suitable to support otter or water vole and pollution moving from the proposed development through hydrological channels. These activities may also alter the biological interest of the site via disturbance to these species.

Air quality impacts

There is likely to be a net increase in vehicle movements close to the water courses on site. Construction traffic may also result in further vehicle movements during the construction phase. Vehicle emissions can have a detrimental impact on the biological features of the LWS through enhanced deposition of nitrogen and ammonia. This deposition can alter the plant communities that are present and may indirectly impact food sources otter and water vole.

Recreational pressure

There is an increased risk of disturbance from recreation on the features of the designated site which lie within the proposed development site. This could impact on faunal features such as water vole and otter. It is recognised that the type of the proposed development is unlikely to generate a significant increase in recreation in the area.

Artificial lighting

there is potential for any new artificial lighting to have an impact on sensitive ecological receptors i.e. protected species such as water vole present within the tributaries on site. Without appropriate design and/ or mitigation, artificial lighting can directly or indirectly impact species. Direct impacts could modify behaviour patterns, increase predation risk or cause disturbance, reducing their ability to disperse through the landscape to commute or forage.

Noise and visual disturbance

The proposed development may result in increased noise and visual disturbance during the construction and operation phases, due to construction activities and increased vehicle movements. Whilst construction activities would be temporary, some residual noise may be experience during the operational phases. Visual disturbance from construction activities and the proximity of the new buildings could impact protected species i.e. water vole which use the LWS.

2.4. Steetley Meadows LWS

It is important to note that there will be no direct impacts on the LWS as part of the proposed development. The following impact pathways have been identified as ways in which the proposed development may have a detrimental impact on the Steetley LWS.

Hydrological and geomorphological impacts

There is no hydrological connectivity between the site and the LWS and this impact pathway is not considered further.

Air quality impacts

The proposed development may result in a net increase in vehicle movements close to the LWS. Construction traffic may also result in further vehicle movements during the construction phase. Vehicle emissions can have a detrimental impact on the biological features of the SSSI through enhanced deposition of nitrogen and ammonia. This deposition can alter the plant communities that are present.

Recreational pressure

The proposed development is commercial and there is a small risk there will be a net increase in visitors to the LWS due to the proximity. There are no public footpaths that pass through the designated site. Access to the LWS, is currently via private admission to the LWS, which further restricts movements onto the site. However, walkers may be able to access the LWS via Redland Lane and a public footpath located off Church Road, a distance of approximately 450m. Proposed screening vegetation for the development would be present on the northern boundary of the site and would restrict and discourage walkers from entering the LWS in this way.

Recreational pressures can result in a number of impacts. Visitor pressure can result in trampling of ground flora, compaction of ground and damage to ground structure during wet periods. Human presence can also result in disturbance of species within the habitats of the LWS, for example nesting birds (although the LWS is not specifically designated due the presence of any particular species). Walkers with dogs can result in addition impacts. These include nutrient deposition through faeces and urine, which can alter plant communities. Dogs which are not under control and off the lead can have detrimental impacts on ground nesting birds during the breeding season. Dogs accessing waterbodies can result in bankside erosion, and dogs accessing water can also introduce pesticides via flea treatments which can impact aquatic invertebrate communities.

Closely associated with increased recreation are further impacts such as littering and vandalism. An increase in visitors to the site may result in further littering

Artificial lighting

Due to the proximity of the site to Steetley Meadows LWS, there is potential for any new artificial lighting to have an impact on sensitive ecological receptors i.e. protected species such as bats or birds present within the LWS. Without appropriate design and/ or mitigation, artificial lighting can directly or indirectly impact species. Impacts could modify behaviour patterns of certain species such as obstructing a bat roost or nesting habitat for birds, increase predation risk or cause disturbance to nocturnal species, reducing their ability to disperse through the landscape to commute or forage.

Noise and visual disturbance

The proposed development may result in increased noise and visual disturbance during the construction and operation phases, due to construction activities and increased vehicle movements, impacting sensitive ecological receptors such as nesting birds. Whilst construction activities would be temporary, some residual noise may be experience during the operational phases. Visual disturbance from construction activities and the proximity of the new buildings could impact nesting and/or foraging behaviour of bird species which use the LWS.

2.5. Ryton Church Pastures

It is important to note that there will be no direct impacts on the LWS as part of the proposed development. The following impact pathways have been identified as ways in which the proposed development may have a detrimental impact on the Ryton Church Pastures LWS.

Hydrological and geomorphological impacts

There is no hydrological connectivity between the site and the LWS and this impact pathway is not considered further.

Air quality impacts

The proposed development may result in a net increase in vehicle movements close to the LWS. Construction traffic may also result in further vehicle movements during the construction phase. Vehicle emissions can have a detrimental impact on the biological features of the LWS through enhanced deposition of nitrogen and ammonia. This deposition can alter the plant communities that are present.

Recreational pressure

The proposed development is commercial and there is a small risk of a net increase in visitors to the LWS. Whilst there are no public footpaths that pass through the LWS, walkers may be able to access the LWS from Church Land and via the grounds of St Leonard's Church to the east (approximately 380m from the site).

Recreational pressures can result in a number of impacts. Visitor pressure can result in trampling of ground flora, compaction of ground and damage to ground structure during wet periods. Walkers with dogs can result in addition impacts. These include nutrient deposition through faeces and urine, which can alter plant communities. Dogs which are not under control and off the lead can have detrimental impacts on ground nesting birds during the breeding season.

Closely associated with increased recreation are further impacts such as littering and vandalism. An increase in visitors to the site may result in further littering.

2.6. Designated sites at distance

The River Avon is a potential impact pathway to designated sites at a significant distance downstream. Once more detail on the development proposals has been produced, this impact pathway should be reviewed, to ensure there are no indirect impacts from the development.

3. POTENTIAL MITIGATION OPTIONS

3.1. Hydrological and geomorphological impacts

In order to avoid any hydrological or geomorphological change at the identified designated sites, the proposed development should seek to ensure that outflow and groundwater seepage as a result of the development site does not alter the natural processes of each designated site. This could be achieved through appropriate design features on site, such as sustainable urban drainage, reasonable avoidance measures i.e. appropriate buffers from riparian features and following best practice pollution prevention guidance during construction and operation. Mitigation measures should be outlined within a Construction Environmental Management Plan (CEMP) to minimise the risk to sensitive receptors.

3.2. Air quality impacts

Were any air quality impacts anticipated on designated sites these could be avoided through appropriate traffic management measures and guidance for visitors and operational traffic. Traffic assessments should be conducted to help understand vehicle movement associated with the proposed development.

3.3. Recreational pressure impacts

Measures can be put in place away from these designated sites reduce or avoid recreational impacts. This includes the provision of suitable alternative natural greenspace on site, to use as an alternative to the designated sites adjacent or in close proximity to the site. Developing and publicising other circular routes which guide walkers away from the designated sites. Information packs and interpretation boards can provide new visitors with information about alternative greenspace and walking routes, as well as informing them about the sensitivities of each designated sites and appropriate behaviour when accessing it, particularly with dogs.

Measures can be put in place on each designated sites such as techniques to guide visitors away from sensitive areas, interpretation boards to inform visitors of the site sensitivities, appropriate behaviours, litter bins and dog waste bins.

Table 1 below provides a summary of the potential risks of impact on the features of each designated site which may result from the proposed development. Where relevant a suite of potential mitigation options are proposed.

Table 1: Risk assessment of potential impacts on designated sites

Impact	Designated Site	SSSI feature	Potential risk and scale of impact	Potential mitigation measures
Hydrological and geomorphological impacts	Ryton and Brandon Gravel Pits SSSI	Geological features	Surface water at the proposed development site should be managed largely within the site. A sensitive design could incorporate sustainable urban drainage (SuDS). No impacts on the hydrological regime at the SSSI anticipated.	• Appropriate drainage strategy
	Brandon Marsh SSSI	Breeding bird assemblages	Hydrological connectivity present and potential for a detrimental effect in the absence of mitigation i.e. areas of marsh drying out and pollution moving through hydrological channels. A sensitive design could incorporate sustainable urban drainage (SuDS) to minimise impacts.	• Appropriate drainage strategy • Construction activities to follow best practice pollution prevention guidance. • Details to be included within a CEMP.
	River Avon & Tributaries LWS	Hydrological features	Tributaries of the River Avon are present within the site and there is hydrological connectivity to the River Avon. Potential for direct damage to watercourses. Providing appropriate buffers within the development design to reduce the risk to these features. A sensitive design could incorporate sustainable urban drainage (SuDS) to minimise impacts.	• Appropriate drainage strategy • Construction activities to follow best practice pollution prevention guidance. • Details to be included within a CEMP.
		Protected and notable species	Tributaries of the River Avon are present within the site and there is hydrological connectivity to the River Avon. Potential for direct damage to habitats and disturbance to protected species i.e. otter and water vole.	• Further assessment may be required to determine suitability of these watercourses for protected species and determine appropriate mitigation if present.

Impact	Designated Site	SSSI feature	Potential risk and scale of impact	Potential mitigation measures
	Steetley Meadows LWS	Grassland, woodland and standing water	Surface water at the proposed development site should be managed largely within the site. A sensitive design could incorporate sustainable urban drainage (SuDS).	• Appropriate drainage strategy
	Ryton Church Pastures LWS	Grassland, hedgerows and watercourses	Surface water at the proposed development site should be managed largely within the site. A sensitive design could incorporate sustainable urban drainage (SuDS).	• Appropriate drainage strategy
Air quality impacts	Ryton and Brandon Gravel Pits SSSI	Geological features	None anticipated.	n/a
	Brandon Marsh SSSI	Breeding bird assemblages	Construction traffic may increase emissions during the construction phase. Site is located approximately 130m south of the SSSI. The proposed design has access routes located to the south of the site, close to the A45. The number of additional vehicle movements will be temporary during construction although levels of operational traffic are unclear at this stage. There is a risk of these emissions altering the habitats communities that are present, which could impact faunal communities, particularly birds.	• Further transport assessments will be required to understand potential impacts and mitigation options.
	River Avon & Tributaries LWS	Hydrological features	Construction traffic may increase emissions during the construction phase. The number of additional vehicle movements will be temporary during construction. Providing appropriate buffers within the development design to reduce the risk to these features.	• Construction activities to follow best practice pollution prevention guidance. • Details to be included within a CEMP.
		Protected and notable species	Construction traffic may increase emissions during the construction phase. The number of additional vehicle movements will be temporary during construction. Providing	• Further assessment may be required to determine suitability of these watercourses for protected species and

Impact	Designated Site	SSSI feature	Potential risk and scale of impact	Potential mitigation measures
			appropriate buffers within the development design to reduce the risk to these features.	determine appropriate mitigation if present.
	Steetley Meadows LWS	Grassland, woodland and standing water	Construction traffic may increase emissions during the construction phase. Site is located on the southern boundary of the LWS. The proposed design has access routes located to the south of the site, close to the A45. The number of additional vehicle movements will be temporary during construction however, the levels of operational traffic is unclear at this stage. The creation of greenspace within the design will provide a buffer from vehicle movements during operation.	• Further transport assessments will be required to understand potential impacts and mitigation options.
	Ryton Church Pastures LWS	Grassland, hedgerows and watercourses	Construction traffic may increase emissions during the construction phase. Site is located approximately 180m east of the LWS. The proposed design has access routes located to the south of the site, close to the A45. The number of additional vehicle movements will be temporary during construction however, the levels of operational traffic is unclear at this stage. The creation of greenspace within the design will provide a buffer from vehicle movements during operation.	• Further transport assessments will be required to understand potential impacts and mitigation options.
Recreational impacts walkers	Ryton and Brandon Gravel Pits SSSI	Geological features	None anticipated	n/a
	Brandon Marsh SSSI	Breeding bird assemblages	Potential increase in visitor numbers may result in trampling of ground flora, compaction, disturbance to breeding bird assemblages, nutrient deposition from dogs. Risk of littering and vandalism. There is likely to be a small increase in visitors to the SSSI,	• Provision of suitable alternative natural greenspace as part of the development • Enhancing other suitable alternative natural greenspace in the area • Developing and publicising circular walks away from the SSSI

Impact	Designated Site	SSSI feature	Potential risk and scale of impact	Potential mitigation measures
			and consequently a risk of these impacts occurring on these features of the site.	• Information packs and interpretation for new visitors • Visitor management on the SSSI (including access restrictions and waste facilities
	River Avon & Tributaries LWS	Hydrological features	Potential increase of visitors on site may result in compaction of ground immediately adjacent to watercourses. Risk of littering and vandalism. Providing appropriate buffers within the development design to reduce the risk to these features.	• Provision of suitable alternative natural greenspace as part of the development • Enhancing other suitable alternative natural greenspace in the area • Developing and publicising circular walks away from the LWS tributaries • Information packs and interpretation for new visitors
		Protected and notable species	Potential increase of visitors on site may result in trampling of habitat and disturbance immediately adjacent to watercourses. Risk of littering and vandalism. Providing appropriate buffers within the development design to reduce the risk to these features.	• Further assessment may be required to determine suitability of these watercourses for protected species and determine appropriate mitigation if present.
	Steetley Meadows LWS	Grassland, woodland and standing water	Potential increase in visitor numbers may result in trampling of ground flora, compaction, disturbance, nutrient deposition from dogs. Risk of littering and vandalism. There is likely to be a small increase in visitors to the LWS, and consequently a risk of these impacts occurring on these features of the site.	• Provision of suitable alternative natural greenspace as part of the development • Enhancing other suitable alternative natural greenspace in the area • Developing and publicising circular walks away from the LWS • Information packs and interpretation for new visitors
	Ryton Church Pastures LWS	Grassland, hedgerows and watercourses	Potential increase in visitor numbers may result in trampling of ground flora, compaction, disturbance, nutrient deposition from dogs. Risk of littering and vandalism. There is likely to be a small increase in	• Provision of suitable alternative natural greenspace as part of the development • Enhancing other suitable alternative natural greenspace in the area

Impact	Designated Site	SSSI feature	Potential risk and scale of impact	Potential mitigation measures
			visitors to the LWS, and consequently a risk of these impacts occurring on these features of the site.	• Developing and publicising circular walks away from the LWS • Information packs and interpretation for new visitors
Artificial lighting	Ryton and Brandon Gravel Pits SSSI	Geological features	None anticipated.	n/a
	Brandon Marsh SSSI	Breeding bird assemblages	None anticipated due to the distance of the proposed development from the SSSI.	n/a
	River Avon & Tributaries LWS	Hydrological features	None anticipated.	n/a
		Protected and notable species	Potential for any new lighting to impact species present within the tributaries present on the site. Further assessment would be recommended. A sensitive lighting design should also be developed for the proposed development.	• A sensitive lighting design, providing appropriate buffers and applying best practice guidelines to reduce the risks to sensitive receptors.
	Steetley Meadows LWS	Grassland, woodland and standing water	Due to the proximity of the LWS, located on the northern boundary of the site, there is potential to impact species from any new proposed lighting. Further assessment would be recommended. A sensitive lighting design should also be developed for the proposed development.	• A sensitive lighting design, providing appropriate buffers and applying best practice guidelines to reduce the risks to sensitive receptors.
	Ryton Church Pastures LWS	Grassland, hedgerows and watercourses	None anticipated due to the distance of the proposed development from the LWS.	n/a
Noise and visual disturbance	Ryton and Brandon Gravel Pits SSSI	Geological features	None anticipated.	n/a
	Brandon Marsh SSSI	Breeding bird assemblages	None anticipated due to the distance of the proposed development from the SSSI.	n/a

Impact	Designated Site	SSSI feature	Potential risk and scale of impact	Potential mitigation measures
	River Avon & Tributaries LWS	Hydrological features	None anticipated.	n/a
		Protected and notable species	Potential for noise and visual disturbance during construction and operation to impact sensitive ecological receptors i.e. water vole present within the tributaries on site. Further assessment would be recommended to understand impacts and identify appropriate mitigation measures.	• Further assessment would be required to determine impacts of noise or visual disturbance and determine appropriate mitigation, if required.
	Steetley Meadows LWS	Grassland, woodland and standing water	Due to the proximity of the LWS, located on the northern boundary of the site, there is potential for noise and visual disturbance during construction and operation to impact sensitive ecological receptors i.e. birds. Further assessment would be recommended to understand impacts and identify appropriate mitigation measures.	• Further assessment would be required to determine impacts of noise or visual disturbance and determine appropriate mitigation, if required.
	Ryton Church Pastures LWS	Grassland, hedgerows and watercourses	None anticipated due to the distance of the proposed development from the LWS.	n/a

4. CONCLUSIONS

The purpose of this document is to provide an initial assessment of potential impacts on designated sites within and in close proximity to Land off London Road. There will be no direct impacts on the integrity of the designated sites identified. This is based on the assumption that all features of the River Avon & Tributaries LWS, which is situated in the development site boundary, are retained, protected and buffered within the proposals.

A number of impact pathways has been identified, and potential mitigation highlighted to minimise the risks of these causing a detrimental impact on any of the designated sites. For some it may be necessary to undertake further assessments to help inform appropriate mitigation, if required.

5. REFERENCES

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Tarmac Trading Limited

London Road, Ryton-on-Dunsmore

Transport Appraisal

May 2025

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London Road, Ryton-on-Dunsmore

Transport Appraisal

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PROJECT NO: J328854

DATE: May 2025

REPORT No:	FILE NAME	PREPARED:	DATE OF ISSUE:	STATUS:	CHECKED:	AUTHORISED:
V1.1	250515 J328854 Transport Appraisal V1.1.docx	ADS	15 May 2025	Draft	JW	CH

CHANGE LOG

VERSION	DATE:	CHECKED BY:	REASON FOR CHANGE:
V1.0	12 May 2025	JW	Initial Issue
V1.1	15 May 2025	JW	Client Comments

CONTENTS

APPENDICES

APPENDIX A Concept Masterplan

1. Introduction

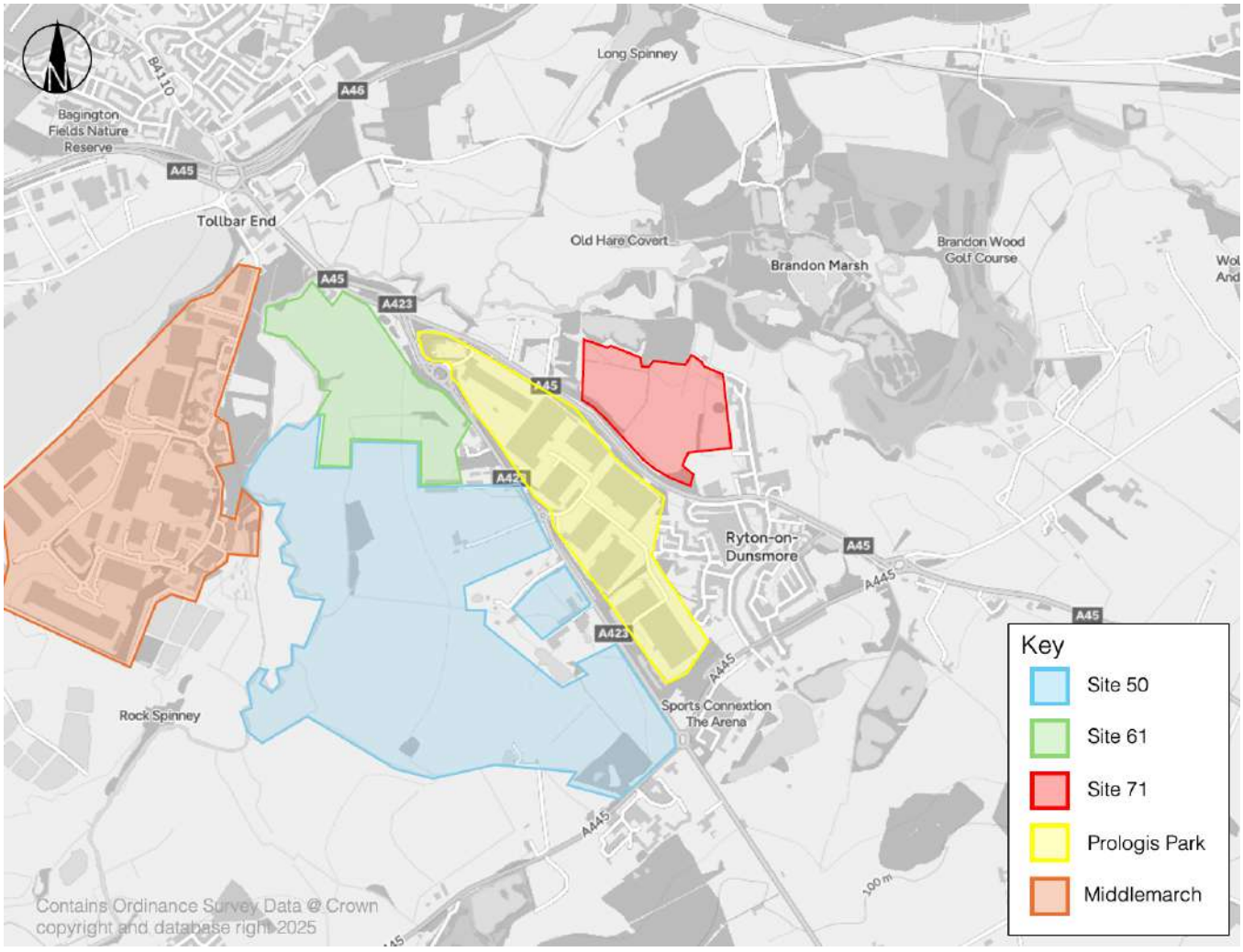
1.1 Overview

1.1.1 This document has been prepared by mode transport planning (mode) on behalf of Tarmac Trading Limited to support the Regulation 19 representation as part of Rugby Borough Council's (RBC) Local Plan Review in relation to the London Road, Ryton-on-Dunsmore site to deliver industrial/employment development.

1.1.2 The site comprises open land and is located in close proximity to Ryton-on-Dunsmore. The site is located within a mixed-use area with residential and industrial land uses located in the surrounding area.

1.1.3 The site is bordered to the south by the A45, to the east by residential dwellings, north by Steetley Meadows and west by industrial uses. The location of the site in relation to the wider area is demonstrated on Figure 1.1.

Figure 1.1 Site Context Location Plan



1.1.4 It is noted that the site was previously submitted during the 'Issues and Options' consultation (Regulation 18) between October 2023 and February 2024, known as Site 71, London Road, Ryton-on-Dunsmore. The previous representation was supported by a Vision Document prepared by Stantec in October 2024, and this document is referred to within this Transport Appraisal.

1.1.5 Ultimately, the site was not taken forward to the next stages of the Local Plan process, but from a transport and highways perspective, it was concluded:

"The surrounding road network is relatively uncongested, and the site has moderate accessibility. The site is proximate to a future workforce in Coventry."

1.1.6 Notwithstanding the previous conclusions reached, this Transport Appraisal seeks to demonstrate that, from a highways and transport perspective, the site is suitable for allocation and therefore should be reconsidered as part of RBC's Regulation 19 process.

1.1.7 When considering this representation, it should be noted that the key principles of the development proposals remain as per the Regulation 18 submission, although the red line boundary has been slightly amended. As such, the development proposals seek to deliver 760,000 sq ft (equivalent to circa 70,600 sqm) of industrial/employment floorspace under flexible Class E, B2 and B8 use classes.

1.1.8 Access will be provided on the southern boundary of the site via the A45, likely to be in the form of a new roundabout. Sustainable transport access will also be afforded at the site as well as relevant parking and servicing arrangements.

1.2 Document Purpose

1.2.1 The purpose of this document is to assess and present the transport and highways credentials of the site, demonstrate its suitability for allocation from a sustainable transport perspective and build on the evidence previously submitted as part of the RBC Regulation 18 site selection process for the site.

1.2.2 On this basis, the Transport Appraisal provides a high level assessment of the site's accessibility, details of the likely development proposals, including proposed access arrangements, and likely transport impacts on the surrounding highway network.

1.2.3 This document also includes a comparative review with the other employment sites being promoted, namely Site 50 (Prologis Park Ryton West) and 61 (Mountpark Ryton), which are located in close vicinity of the site (as shown on Figure 1.1). It is noted that both of these sites are being taken forward to the next stages of RBC's Local Plan Review.

1.2.4 When considering Sites 50 and 61, these have been grouped together within the Preferred Option Draft of the Rugby Borough Local Plan (March 2025) and have been joined together under Site 328. This allocation seeks to collectively provide for approximately 350,000 sqm of employment floorspace across 171.86ha.

1.2.5 It should also be noted that the contents of this Transport Appraisal are informed by supporting Local Plan Review evidence documents available at the time of writing, including the Transport Network Analysis Methodology Note prepared by SLR in February 2025.

1.2.6 However, it is important to note that the Local Plan Review Strategic Transport Assessment is not yet available within the RBC evidence base. As such, to inform likely traffic impacts, a high-level assessment of the potential trip generation of the proposed development and likely impacts on the surrounding highway network has been undertaken and presented within this report. Once the Strategic Transport Assessment is available, a further assessment can be undertaken in relation to Site 71.

1.3 Document Structure

1.3.1 The remainder of this report is structured as follows:

- Chapter 2: Planning Policy and Guidance: This chapter details the national and local policy documents relevant to the proposals.
- Chapter 3: Site Context: This chapter sets out the site in relation to the wider area and provides a comparative review of committed and promoted sites within RBC's Local Plan Review in the vicinity of the site.
- Chapter 4: Principles of Development: This chapter details the development proposals and summarises the likely access (by all modes), the parking and servicing arrangements. This chapter also sets out an overall transport vision that the future development will adopt.
- Chapter 5: Traffic Impact Assessment: This chapter provides a forecast of trip generation, which considers the likely impact of the development proposals as well as the likely cumulative impacts of Sites 50, 61 and 71 on the surrounding highway network. It also provides a comparative review of the adjacent sites in terms of potential congestion and delay as presented in the supporting evidence base.
- Chapter 6: Summary: This chapter summarises the points made within the Transport Appraisal report.

2. Planning Policy and Guidance

2.1 Overview

2.1.1 This chapter provides a review of the adopted National and Local transport policies, which relate to the site. This includes a review of the National Planning Policy Framework (NPPF), the adopted RBC Local Plan and RBC Local Plan Review documents, as well as Warwickshire's Local Transport Plan (LTP).

2.2 National Policy

National Planning Policy Framework (2024)

2.2.1 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. The NPPF presumes in favour of sustainable development and is a material consideration in planning decisions.

2.2.2 Paragraph 109 of the NPPF highlights that "*transport issues should be considered from the earliest stages of plan-making and development proposals using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve*:

- *making transport considerations an important part of early engagement with local communities;*
- *ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;*
- *understanding and addressing the potential impacts of development on transport networks;*
- *realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;*
- *identifying and pursuing opportunities to promote walking, cycling and public transport use; and*
- *identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains."*

2.2.3 Paragraph 115 of the NPPF states that when assessing specific site uses for development applications, it should be ensured that:

- *"sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
- *safe and suitable access to the site can be achieved for all users;*

- *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*

- *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach."*

2.2.4 Paragraph 116 of the NPPF ultimately states the following for transport:

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

2.3 Local Policy

Rugby Borough Council Local Plan 2011-2031 (June 2019)

2.3.1 At the local level, the adopted Rugby Borough Council Local Plan (2011-2031), adopted June 2019, sets out policies to guide development across the borough. Relevant transport related policies set out within the document include:

Policy D1: Transport

"Development will be permitted where sustainable modes of transport are prioritised and measures designed to mitigate transport impacts arising from either individual development proposals or cumulative impacts caused by a number of proposals are provided."

"All large scale developments which result in the generation of significant traffic movements, should be supported by a Transport Assessment and where necessary a Travel Plan, to demonstrate practical and effective measures to be taken to mitigate the adverse impacts of traffic. It must consider:

- *The impact of the proposal upon existing infrastructure;*
- *How the site will connect safely to public transport;*
- *Safe and convenient access to pedestrians and cyclists;*
- *Potential impact of heavy goods vehicles accessing the site, including during construction: and*
- *The entering into of bus and/or freight partnerships with the County Council and/or third parties."*

Policy D3: Infrastructure and Implementation

"The delivery of new development will be dependent on sufficient capacity being available in existing infrastructure and/or measures being proposed to mitigate its impact. Where this cannot be demonstrated permission for new development will only be granted where additional capacity can be released through new infrastructure, or better management of existing infrastructure.

Developer contributions may be sought to fund new infrastructure when required to mitigate development impacts and a programme of delivery will be agreed before development can take place."

Rugby Borough Council Local Plan Review – Preferred Option Consultation Document (March 2025)

2.3.2 RBC is consulting on the Preferred Option Consultation Document from 24 March 2025 until 19 May 2025. The Preferred Option Consultation Document sets out a proposed development strategy for the borough for the period 2024-2045. This identifies the location of future development and land use and also includes draft development management policies to be used for determining planning applications.

2.3.3 Within the document, it sets out the preferred sites for allocation, which have been selected from 124 sites submitted during the 'Issues and Options' consultation (Regulation 18) between October 2023 and February 2024.

2.3.4 As noted in Chapter 1, Sites 50 and 61 (collectively known as site 328), which are located in the vicinity of Site 71, have being taken forward and will seek to deliver circa 350,000 sqm of floorspace for employment uses.

2.3.5 It is important to note that within the potential site allocation of Site 328, improvements to public transport and active travel are noted to be required, with new pedestrian and cycle links provided to link existing routes on the Tollbar End Roundabout and to Ryton-on-Dunsmore. In addition, the existing Public Rights of Way (PROW) should be maintained and kept accessible to all users.

2.3.6 In addition, the relevant transport-related policy outlined within this document is set out below.

Policy I1 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 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."

Warwickshire County Council Local Transport Plan (LTP4)

2.3.7 Warwickshire County Council (WCC) Local Transport Plan was adopted in June 2023, WCC is responsible for the local highway network within Rugby and as such the relevant policy positions relating to future development at the site are as follows:

- Policy Position MS1 supports development that encourages the use of sustainable travel modes to promotes schemes which are as environmentally beneficial as possible.
- Policy Position MS3 recognises the diversity in urban landscape within the county and as such considers the *"need to tailor solutions according to individual community needs within an overall framework of sustainability and economic success."*
- Policy Position ST2 sets out evidence-led road safety interventions, which seek to improve the overall road safety in the County, including casualty reduction schemes, road safety audits, traffic calming initiatives and speed management measures.

2.3.8 The general theme of the WCC LTP4 is to promote a transport hierarchy that can deliver on the aim of sustainable travel throughout Warwickshire, with active travel at the top of the hierarchy and private vehicles at the bottom.

2.4 Summary

2.4.1 On the basis of the above, it is clear that future development must seek to encourage sustainable travel and would need to demonstrate that future development would not lead to negative adverse effects on the surrounding highway network.

2.4.2 As such, although at an early stage, consideration has been given to how the development could be delivered with regard to the relevant policy positions outlined above.

2.4.3 It is also important to note that the RBC Local Plan Review document (March 2025) plans to take Sites 50 and 61 (collectively known as Site 328) forward for allocation. Given the site (Site 71) proximity to these sites, it is considered to be well placed for future industrial/employment development, and this is explored further throughout this Transport Appraisal.

3. Site Context

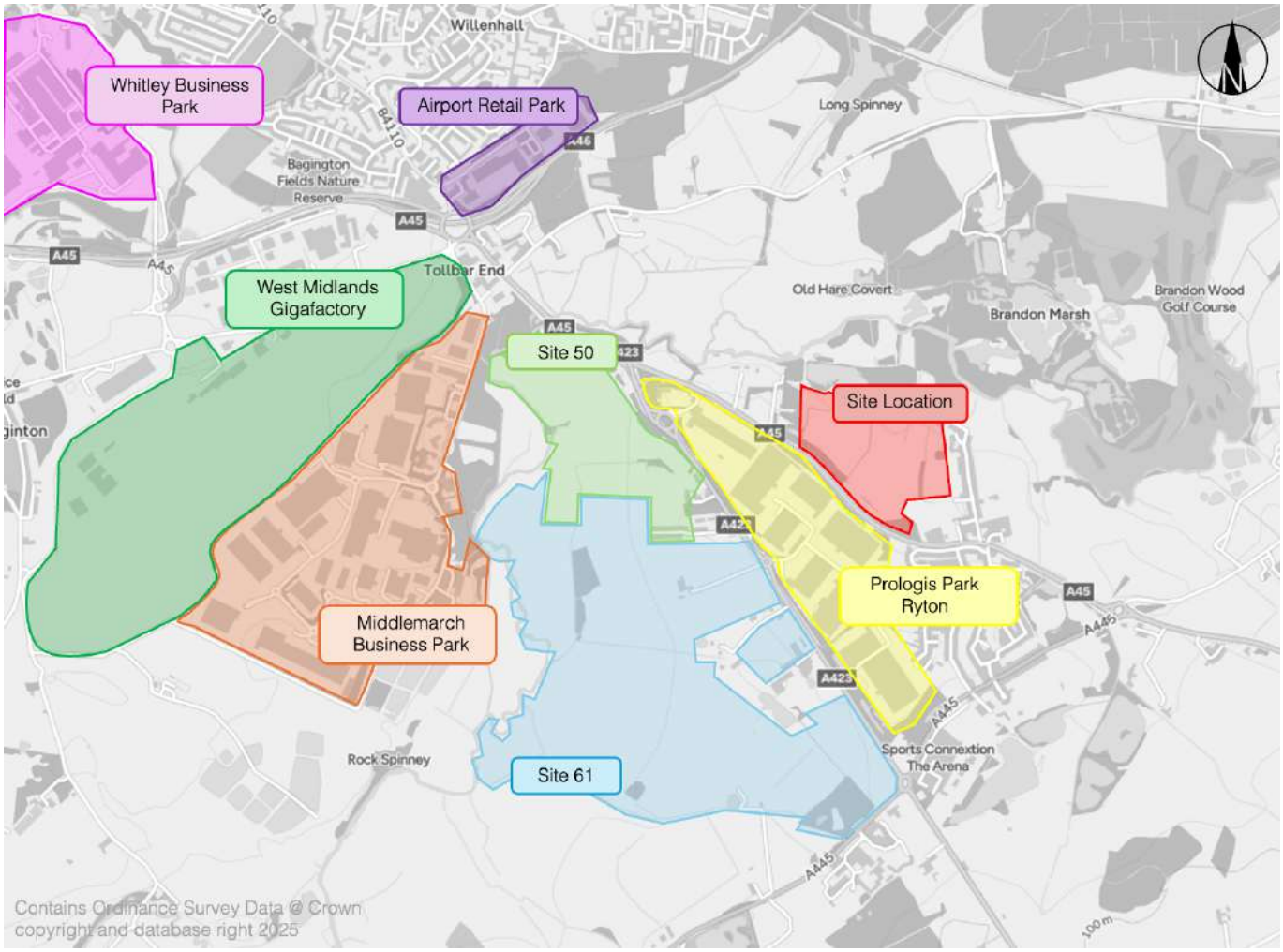
3.1 Overview

3.1.1 The site currently comprises open land and is bound to the south by the A45, to the east by residential dwellings, north by Steetley Meadows and west by industrial uses. The site is located in close proximity to Ryton-on-Dunsmore, approximately 6km to the south east of Coventry City Centre, accessed through the Tollbar End Roundabout and 12km to the west of Rugby.

3.1.2 The site is also noted to be located in an area comprising existing commercial uses, with Prologis Park Ryton located to the south and Middlemarch Industrial Estate located to the south west of the site. As noted, Sites 50 and 61, promoted as part of the RBC Local Plan are also located in close proximity. On this basis, the site is well located with regard to future delivery of an industrial/employment development given the context of surrounding uses and highway network.

3.1.3 The location of the site in the context of the local area is shown on Figure 3.1.

Figure 3.1 Site Context Plan



3.2 Accessibility

Strategic and Local Highway Road Network

3.2.1 The site is strategically positioned adjacent to the A45 London Road, a primary east-west arterial route in the West Midlands, which forms a part of the Strategic Road Network (SRN).

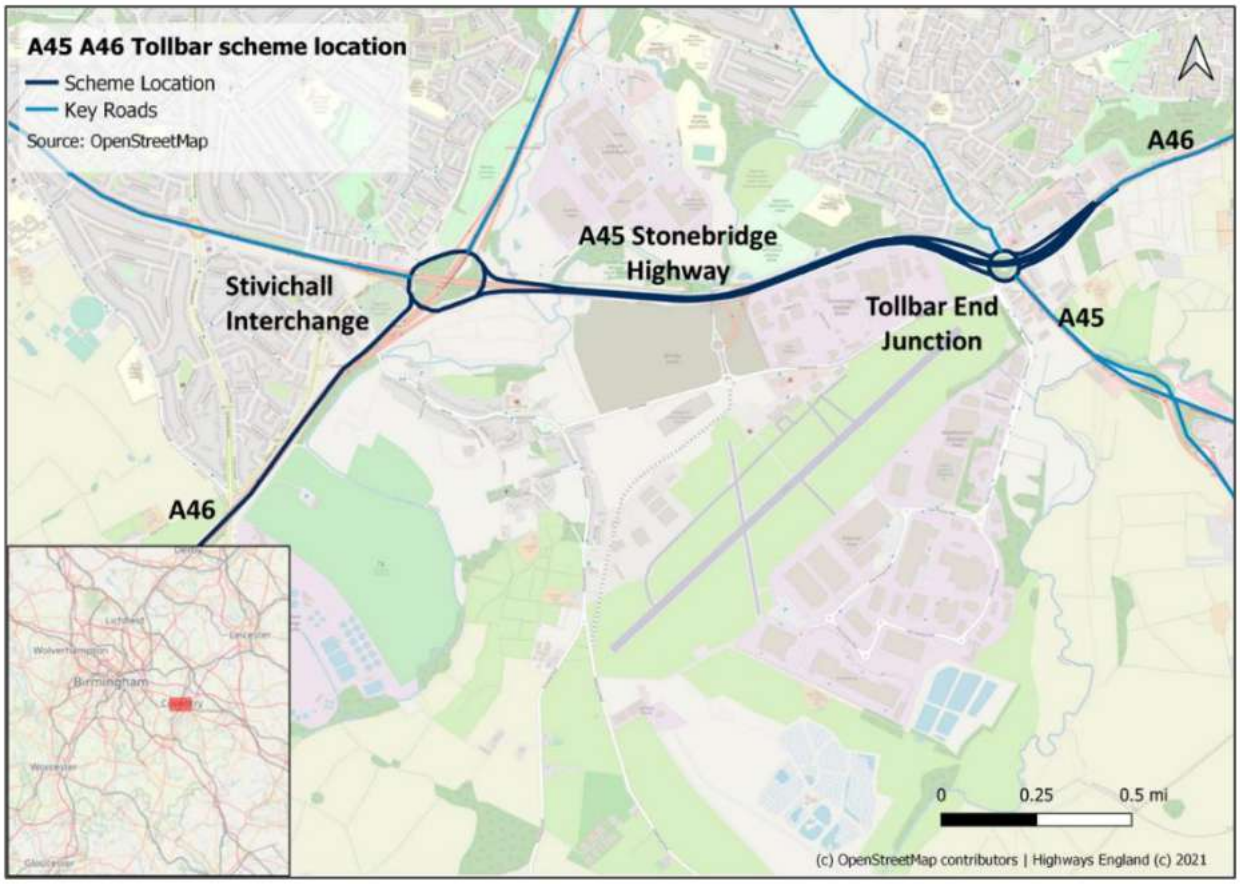
3.2.2 The A45 provides direct connectivity to Coventry, approximately 6km north-west of the site and Rugby, approximately 12km to the east. The A45 also links to motorways, including the M45, M1, and M6, facilitating regional and national freight and commuter movements.

3.2.3 The site in relation to the wider highway network is shown on Figure 3.2.

Figure 3.2 Site Location in Relation to Wider Highway Network

3.2.4 It is noted that the Tollbar Road Roundabout, located to the west of the site was subject to improvement works, completed in 2021. The location of the improvement scheme is demonstrated on Figure 3.3.

Figure 3.3 Tollbar Road Roundabout Improvement Project



Source: National Highways and OpenStreetMap contributors

3.2.5 The improvement works have been built out and include:

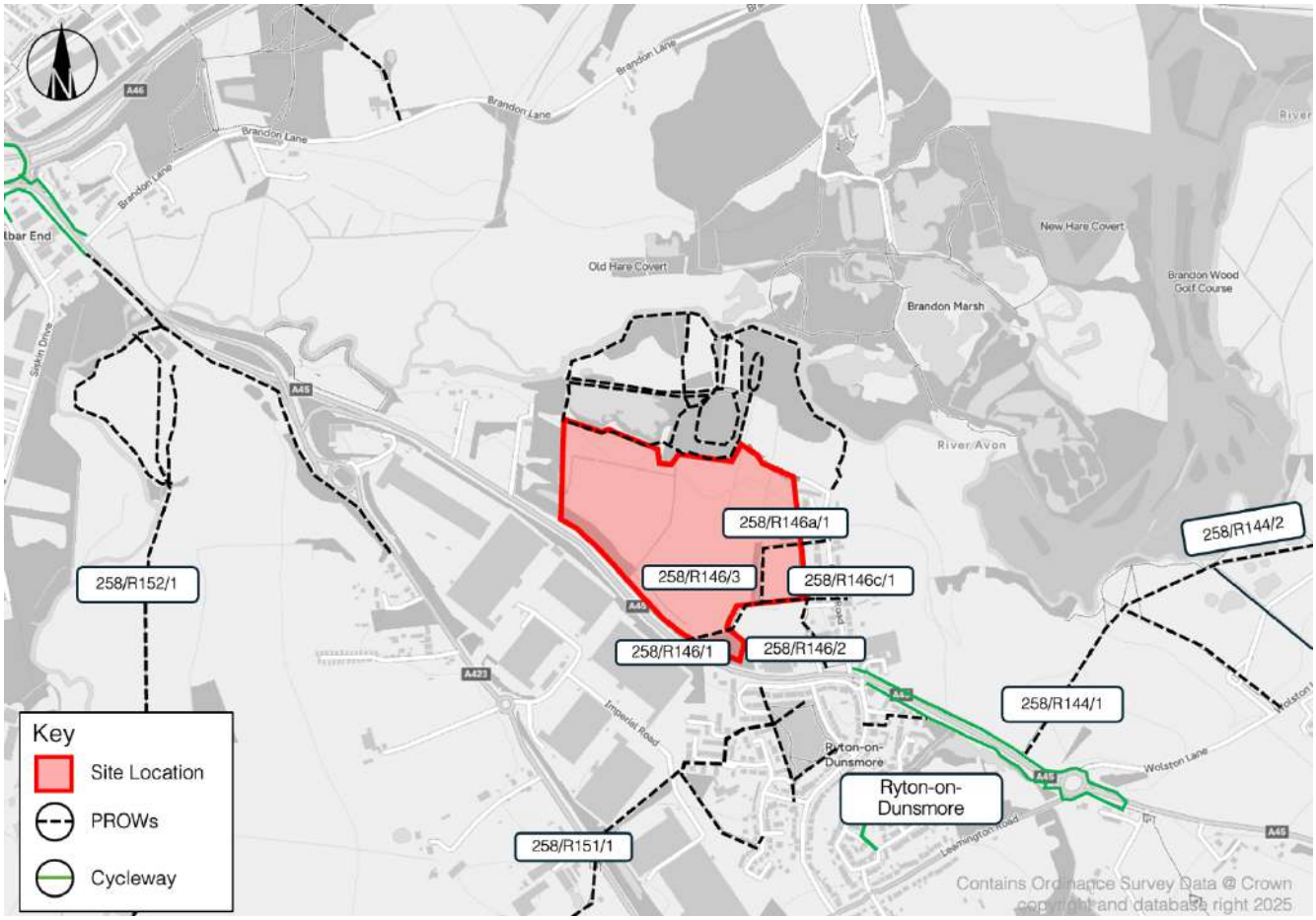
- Enlarged roundabout.
- Introduction of an underpass, connecting the A45 Stonebridge Highway and A46 Coventry Eastern Bypass.
- Addition of an extra lane in each direction between Stivichall and Tollbar junctions. The overall length of the scheme is 3km.

3.2.6 A report prepared by National Highways in December 2023 found that the improvement scheme at the Tollbar Road Roundabout has reduced the overall volume of traffic using the junction and the works have provided additional capacity. Journey times were noted to be improved for those travelling via the new underpass at Tollbar End. In addition, pedestrian and cycle connectivity was also improved through the provision of a new shared pedestrian/cycleway.

Walking and Cycling

3.2.7 There are a number of Public Rights of Way (PROW) in the vicinity of the site, which provide connections into the neighbouring villages of Ryton-on-Dunsmore and Bubbenhall. The PROW network is shown on Figure 3.4.

Figure 3.4 Pedestrian and Cyclist Connectivity



3.2.8 In addition to the numerous PROWs in the area, there is noted to be sections of footway located on the northern and southern sides of the A45 in the vicinity of the site to the east and west. To the east, there is an underpass adjacent to Church Road, which facilitates crossing of the A45 and provides a direct link to Ryton-on-Dunsmore.

3.2.9 There are a number of local amenities located within Ryton-on-Dunsmore, including a Co-operative supermarket, Ryton Recreation Grounds a Village Hall, eateries and public houses.

3.2.10 With regard to cycling, there is a shared pedestrian/cycle way on both sides of the A45 from Church Road to Ryton Roundabout. The roads within Ryton-on-Dunsmore village are also noted to be conducive to cycling with speed limits of 20mph.

3.3 Public Transport

3.3.1 The nearest bus stops to the site are located circa 500m to the east of the site on either side of the A45, which is equivalent to an approximate 7-minute walk. This stop is served by bus service 25. A summary of the local bus service is provided in Table 3.1.

Table 3.1 Summary of Bus Services in the Vicinity of the Site

Bus No.	Route	Weekday Frequency	Weekend Frequency	
			Saturday	Sunday
25	Coventry – Rugby (via Baginton, Ryton & Bourton)	07:01, 09:01, 13:46, 16:25 and 18:26	07:19, 09:19, 11:41, 14:04, 16:43 and 18:44	-

3.3.2 As outlined in Table 3.1, service 25 currently runs 1 service approximately every 2 hours on weekdays and Saturdays from the bus stops in the vicinity of the site.

3.3.3 With regard to rail travel, the nearest station to the site is Coventry Railway Station, approximately 6.6km north-west of the site. The station is noted to be accessible by bus service 25.

3.3.4 Coventry Railway Station provides connections towards the Midlands and beyond, with trains travelling as far as Edinburgh. The station is served by West Midlands Trains, CrossCountry and Avanti West Coast trains travelling into London Euston, Birmingham, Bournemouth and Manchester.

3.3.5 The station benefits from 120 cycle spaces in the form of compounds and stands, sheltered and with CCTV. The station also has 336 car parking spaces available, including 16 accessible spaces.

3.3.6 A summary of rail services from Coventry Rail Station is provided in Table 3.2.

Table 3.2 Summary of Rail Services

Destination	Peak Hour Frequency		Weekend Frequency		Approximate Journey Times
	AM	PM	Saturday	Sunday	
London Euston	5 per hour	5 per hour	5 per hour	3 per hour	1h 10m
Birmingham New Street	4 per hour	4 per hour	4 per hour	3 per hour	30m
Bournemouth	1 per hour	1 per hour	1 per hour	1 per hour	2h 49m

3.4 Summary

3.4.1 The above demonstrates that the site is very well located with regard to the highway network, which would facilitate onward connections to the wider area. This is particularly important for industrial/employment schemes of this nature.

3.4.2 Further, it is demonstrated that there are existing walking, cycling and public transport connections in the local area, which provide alternatives to the private car.

3.5 Comparative Accessibility Review

3.5.1 Noting the proximity of Site 50 (Prologis Park Ryton West) and 61 (Mountpark Ryton), which are collectively known as Site 328, to Site 71 (London Road, Ryton-on-Dunsmore), it has been possible to undertake a comparison of the sites with regard to accessibility.

3.5.2 In addition to Sites 50 and 61, there are also other operational industrial/employment sites in the vicinity of the site, including Prologis Park, Middlemarch Business Park, Whitley Business Park and the Airport Retail Park and the West Midlands Gigafactory, which provide useful context with regard to the accessibility review of the London Road, Ryton-on-Dunsmore site. The location of these uses are shown on Figure 3.1.

3.5.3 As noted within this document, Sites 50 and 61 (collectively known as Site 328) were taken forward to the next stages within the RBC Local Plan process, i.e. the Local Plan Review document. However, improvements to existing transport and active travel connections in the area are noted to require improvement.

3.5.4 In addition, it is noted that an outline planning application (planning ref: R14/0217) was submitted at the site opposite Site 71 (Prologis Park) for the use of 45,000 sqm of flexible Class B2 (General Industry) & Class B8 (Storage, Warehouse & Distribution) floorspace. The proposals at the site were approved in February 2015 and is understood to be largely built out. The conclusions reached in respect of this scheme demonstrate that the area is inherently accessible and was found to be acceptable, providing context for any future development at London Road, Ryton-on-Dunsmore.

3.6 Supporting Reg 18 Documentation – Accessibility Review

3.6.1 In addition to the above review, it is noted that as part of the Local Plan Review, a Transport Network Analysis Methodology Note was prepared by SLR in February 2025, which considered the accessibility of all sites being promoted as part of RBC's call for sites process.

3.6.2 As part of the assessment, each site was assigned a Public Transport Accessibility Level (PTAL) score. The PTAL is a measure of the accessibility of a location to the public transport network, taking into account walk access time and service availability. PTAL is measured on a 1-6 scale, with 1 being the least accessible and 6 being the most accessible.

3.6.3 The SLR assessment was based on a middle layer super output area (MSOA) and lower layer super output area (LSOA) review rather than site-specific accessibility. As such, the assessment is noted to provide information on accessibility for part of the borough in which the site lies in rather than considering each site in detail.

3.6.4 However, given the proximity of Sites 50 and 61 to Site 71, the SLR review provides useful context in establishing the general accessibility of the area, particularly as Sites 50 and 61 are identified within the Local Plan Review as part of the RBC Reg 19 process.

3.6.5 In this regard, the three sites (site 50, 61 and 71) are noted to perform the same with regard to accessibility, all achieving a PTAL score of 1a in the AM and PM peaks. This score would not be improved by any currently proposed or recent public transport improvements and as such, all sites would likely require investigation for public transport and active travel improvements.

3.6.6 Given the proximity of the three sites, there is the potential for a joint approach to be undertaken with regard to improvements that could mutually benefit all sites, which would improve the PTAL score of all sites, which is currently noted to be 1a.

3.6.7 For example, if existing bus services were to be improved or new services introduced in the area, through a greater level of development in the area, the potential patronage of such services would be increased and potential services made more viable.

3.7 Summary

3.7.1 On the basis of the above, it is evident that the site is well located with regard to the existing highway network, being in close proximity to the A45 and wider SRN network. Further, there are existing public transport, walking and cycling opportunities in the area that would facilitate travel by non-car modes.

3.7.2 In addition, Sites 50 and 61 (collectively known as Site 328) are located in the vicinity of Site 71, and are noted to be taken forward to the next stages of the Local Plan process. As such, the site is considered to be acceptable from an accessibility standpoint. Further, there are also other employment areas in the area, which also provide useful precedent for similar schemes to that proposed at Site 71.

3.7.3 There is also noted to be opportunities to provide cross-site benefits in further improving accessibility in the area and a joined-up approach would be mutually beneficial. However, all sites would need to demonstrate delivery without reliance on other schemes as part of future planning applications.

4. Principles of Development Proposals

4.1 Overview

4.1.1 The development proposals at the site (Site 71) comprise approximately 70,600 sqm of industrial/employment floor space, which at this stage is intended to fall under flexible use classes E(g)(iii), B2 and B8.

4.1.2 The development is likely to be split across a number of larger and smaller scale units, currently shown in the concept masterplan (provided in Appendix A) across 7 units.

4.1.3 It is noted that the concept plan is based on a previous red line boundary and has been updated to remove the northern and western parts of the site boundary. Notwithstanding this, the proposals remain broadly in line with what was previously presented during the Regulation 18 Local Plan consultation.

4.1.4 For reference, the concept masterplan is also shown on Figure 4.1.

Figure 4.1 Proposed Concept Site Plan

4.2 Site Access

Vehicular Access

4.2.1 At this stage and in line with the previously submitted representation for Site 71, the development proposals include the provision of a new roundabout junction from the A45 on the southern boundary of the site. It is noted that it is beneficial of a scheme of this nature to provide direct access onto a road such as the A45, which in turn provides excellent connections to the wider SRN.

4.2.2 The proposed new access is intended to serve as the primary point of access to the development and will be subject to more detailed consideration with regard to design guidance and relevant discussions with WCC and NH would need to be undertaken.

4.2.3 The introduction of the roundabout at this location would also seek to reduce speeds at this location, which in turn is likely to improve highway safety near the village of Ryton-on-Dunsmore. Improving road safety is noted to be one of WCC's targeted policies, so in this regard, the access roundabout design aligns with the aspirations of the county.

4.2.4 The design of any internal access roads to the development would also align with relevant design guidance and would facilitate the likely largest vehicle to serve the site, which is anticipated to be a 16.5m articulated lorry at this stage.

Walking and Cycling Access

4.2.5 The proposed roundabout access would also provide the opportunity to improve pedestrian and cycle connectivity in the area and provide a connection across the A45 from the north to the south. This would therefore provide an alternative route to the existing underpass to the east of the site that currently facilitates crossing of the A45 towards Ryton-on-Dunsmore.

4.2.6 Proposed pedestrian and cycle connections would be provided in line with the relevant design guidance, i.e. LTN 1/20.

4.2.7 In addition, there is also the opportunity for the site to deliver improved connections to the east of the site via Church Road, which would in turn improve permeability to the site and wider area.

4.2.8 Within the site, a network of footways will be provided to ensure safe access and consideration will also be given to how the site links to the existing network of PROWs.

Public Transport Access

4.2.9 Whilst there is an existing bus stop located on the A45 to the east of the site, this is noted to be a fairly infrequent service (1 service every 2 hours). As part of any future development, it is likely that investigation will be required to improve this service. As noted above, this could also benefit the wider area, including potentially allocated Sites 50 and 61.

4.2.10 Notwithstanding investigating improvements to existing bus services, there may also be merit in exploring alternative methods to improve sustainable transport access to the site. For example, a new bespoke mini-bus service could be investigated, which would pick up future employees from key areas and/or nearby railway stations (i.e. Coventry). Again, this could also benefit employment developments in the vicinity of this site.

4.3 Parking and Servicing Arrangements

4.3.1 Whilst the masterplan is still at its concept stage, parking provision will be designed in accordance with adopted Warwickshire County Council parking standards. A combination of HGV service yards, staff and visitor parking and accessible bays will be provided

4.3.2 Cycle parking, Electric Vehicle (EV) and disabled parking provision will also be sought in line with adopted standards.

4.3.3 When considering the above, it will be important that parking is provided at a level that meets operational needs, whilst also aligning with policy aspirations to support travel by non-car modes.

4.3.4 Each unit will be serviced by dedicated HGV access and yard areas, separated from car parking and pedestrian access for safety and operational efficiency. Internal site roads and turning spaces will comply with design guidance, demonstrated by swept path analysis to accommodate the largest vehicle expected to use the site.

4.4 Transport Vision of the Site

4.4.1 On the basis of the above, the transport vision for the London Road, Ryton-on-Dunsmore (Site 71) is to create a well-connected, sustainable development from the outset for employees and visitors, whilst also enabling efficient deliveries associated with an industrial/employment scheme of this nature. The key principles of the transport vision are as follows:

1. Encourage travel by non-car modes for employees

- Provide safe and direct walking and cycling routes within the site and to key off-site destinations, including Ryton-on-Dunsmore village, surrounding employment areas, and bus stops.
- Provide secure cycle parking, showers, lockers, and changing facilities to encourage active travel for staff.
- Develop and implement a comprehensive Travel Plan with incentives for car-sharing, cycling, and public transport use.

2. Public transport integration

- Work with WCC and local operators to provide or enhance bus services, ensuring high-frequency connections to key destinations including Rugby and Coventry.
- Ensure convenient and good quality walking routes are provided to nearby bus stops.

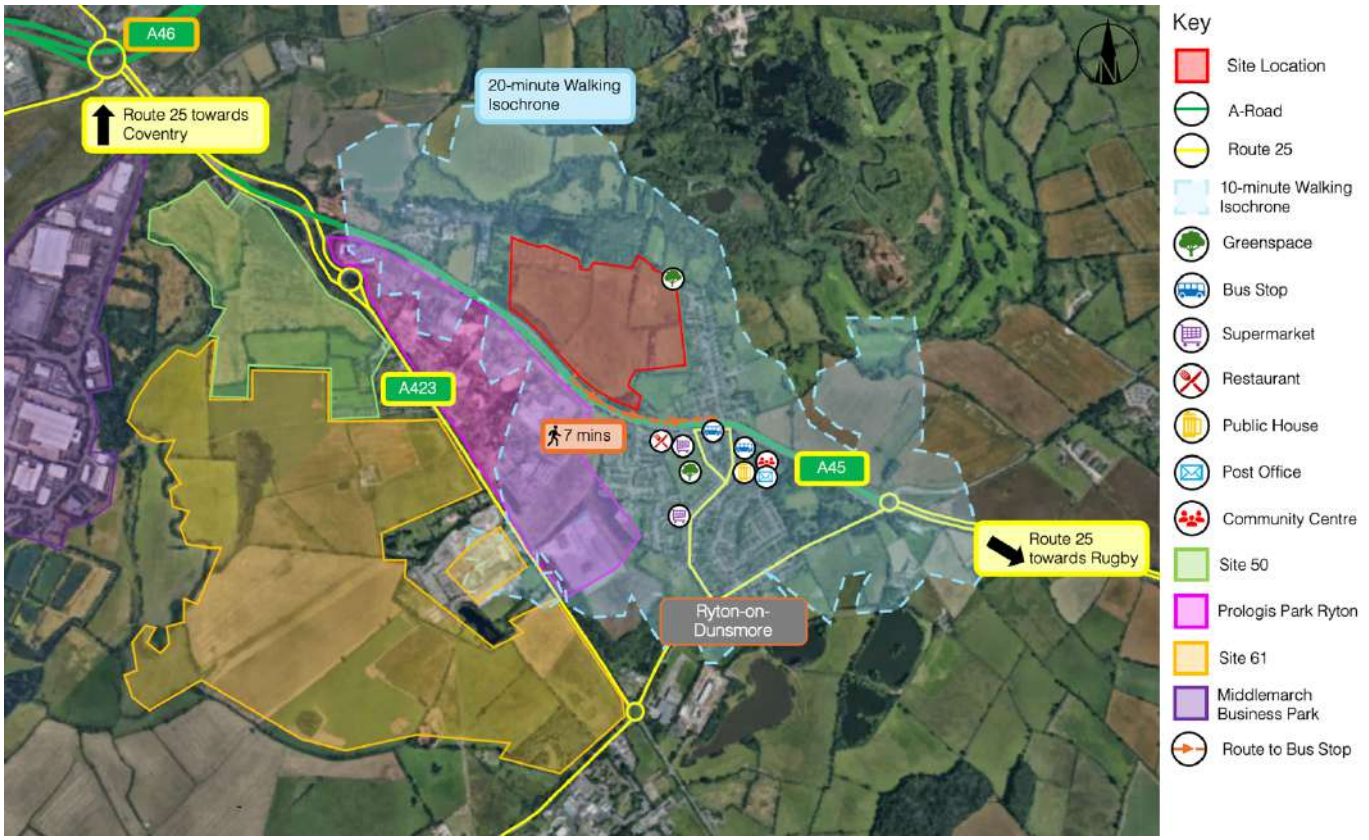
- Explore the use of demand-responsive or employee shuttle services from key rail and urban hubs.

3. Efficient and low-impact HGV movement

- Design site access and internal roads to accommodate HGVs while minimising their impact on the surrounding road network.
- Implement time-based delivery management systems to reduce peak-hour freight movements, to be detailed within a Delivery and Servicing Management Plan (DSMP).

4.4.2 The transport vision plan is provided on Figure 4.2.

Figure 4.2 Transport Vision Plan



4.5 Summary

4.5.1 As outlined above, the development proposals seek to deliver circa 70,600 sqm of flexible industrial/employment floorspace with vehicular access to be provided from the A45 in the form of a new roundabout via the southern boundary of the site.

4.5.2 The proposed vehicular access would bring benefits in seeking to change the environment in the vicinity of the site, which could result in additional road safety improvements

4.5.3 In addition, appropriate access will be afforded by non-car modes, with pedestrian access provided to the south of the site as well as new connections to the east via the existing residential area. There is also the potential to improve access by public transport with improvements to existing bus services and/or new bus services/bespoke shuttle bus service.

4.5.4 The development proposals will also provide appropriate provision for parking and servicing based on the likely use of the site.

4.5.5 On this basis, it is evident that the development proposals could be delivered from a transport and highways perspective, subject to further design of access and the internal site layout. The proposals would seek to enhance existing pedestrian and cycle infrastructure, which would seek to deliver sustainable transport links at the site, in line with the Transport Vision outlined above.

4.5.6 Given the site is located within an area of existing employment and industrial uses, it is considered to be located within a prime location for a development of this nature.

5. Potential Traffic Impact Assessment

5.1 Overview

5.1.1 This chapter sets out the methodology for calculating the anticipated trips that the proposed development could generate. This includes information on trip rates and resulting trips across the AM and PM peak hours of 08:00-09:00 and 17:00-18:00.

5.1.2 This section also considers the potential cumulative impacts of Sites 50 and 61, which were noted to require further consideration within the response provided to the 'call for sites' assessment work.

5.1.3 A comparison is also provided between the three sites with regard to the assessment work undertaken by SLR in support of the RBC Local Plan evidence base to assess how Site 71 compares against Site 50 and 61 with regard to congestion. As noted, both sites have been taken forward in the next stage of the RBC Local Plan process, so provide useful context for this site.

5.2 Trip Generation

5.2.1 To determine the likely trip generating potential of the proposed development at the site, a high-level review has been undertaken. At this stage, the B2 (general industrial) and B8 (warehousing) trip rates presented as part of the planning application at Prologis Park (planning ref: R14/0217), opposite to Site 71 have been reviewed.

5.2.2 Following a review of the approved application, applying the trip rates presented to the proposed floor area at Site 71 (circa 70,600 sqm) would result in between 100-300 two-way vehicle movements in the AM and PM peak periods.

5.2.3 Whilst the above provides an indication of the level of trips expected as a result of the development proposals, this would be subject to a more detailed review to accurately reflect the proposed development at the site.

5.3 Trip Distribution

5.3.1 In order to establish the likely trip distribution from the site on the surrounding highway network, 2011 Census Journey to Work data has been interrogated. Using Nomis, location of usual residence and place of work by method of travel to work at MSOA level, with Rugby 004 as place of work, likely commuting traffic distribution has been determined.

5.3.2 The assumed high level traffic distribution on the A45 has been summarised in Table 5.1.

Table 5.1 High Level Traffic Distribution

Routing	Distribution (%)
Via A45 – north west	47
Via A45 – south east	53
Total	**100%**

5.3.3 As set out in Table 5.1, following an initial assessment, it is likely that future commuting trips will be split relatively evenly on the A45, with circa 47% routing north west towards Coventry and 53% routing south east towards Rugby and Northampton.

5.3.4 With regard to HGV traffic, given the strategic location of the site, these movements are likely to route towards the M1, M40, M42 and the M6. On this basis, HGVs will not have to route through village roads, including Ryton-on-Dunsmore.

5.4 Likely Transport Impacts

5.4.1 Based on the above review, it is likely that a further detailed assessment of the local highway network will be required. In this regard, it is noted that the A45 corridor will be subject to a further review, with mitigation measures identified.

5.4.2 Whilst highway improvements could be explored, there will also be merit in exploring sustainable transport improvements to encourage future employees at the site to travel by sustainable modes. Indeed, this would align with the Transport Vision at set out within this Transport Appraisal.

5.4.3 Notwithstanding this, junctions in the vicinity of the site subject to further review are likely to include the Leamington Road/A45/Warwick Road roundabout to the south east of the site and the Tollbar End roundabout to the north west, noting the improvement works delivered at the junction in 2021.

5.4.4 The study area of the highway impact assessment is likely to require assessment of other sensitive junctions in the vicinity of the site. However, at the time of writing, the RBC Local Plan Review Strategic Transport Assessment is not yet available and is noted to be forthcoming. This document would need to be reviewed to understand congestion in the area, as well as potential cumulative transport impacts, which is also considered below as well as any identified mitigation schemes.

5.5 Potential Cumulative Impact Review

5.5.1 As set out within this Transport Appraisal, the site is located in close proximity to two other sites that are currently being considered for allocation (Sites 50 and 61). As such, any future assessment of the surrounding highway network should consider the potential cumulative impacts of future development of the three sites.

5.5.2 It is also noted that this was requested by NH given all three sites' location to the SRN. NH noted that there is the potential for significant impacts on the SRN, especially due to employment trips from Coventry via the Tollbar End Roundabout. NH went on to state that physical highway mitigation on the SRN is likely based on the likely cumulative impacts of development in the area.

5.5.3 On this basis, and as part of any next steps, it will therefore be important to establish likely impacts of Site 71 on a standalone basis, but also cumulatively with the other nearby sites (Site 50 and 61).

5.5.4 It will then be possible to consider potential highway improvement schemes, in the form of junction improvements or sustainable transport improvements, to effectively mitigate the potential impact of future development in the area on the local and strategic road networks. This will also be informed by the RBC Local Plan Strategic Transport Assessment, once available.

5.6 Supporting Reg 18 Documentation – Transport Network Analysis

5.6.1 Notwithstanding the above, SLR undertook a Transport Network Analysis (February 2025), which assessed the 124 Local Plan sites using Department for Transport (DfT) 2023 Inrix data (real-time GPS probe data combined with real-time traffic flow information) to determine relative congestion impacts.

5.6.2 Sites were graded into 6 categories based on Average Speed Ratios (ASR), comparing peak-hour speeds against free-flow conditions, these are summarised in Table 5.2.

Table 5.2 Average Speed Ratio

Category	Average Speed Ratio	
6	>80%	<100%
5	>70%	<79.9%
4	>60%	<69.9%
3	>50%	<59.9%
2	>40%	<49.9%
1	>30%	<39.9%

5.6.3 Category 6 represents the least congested sites, whilst Category 1 represents the most congested.

5.6.4 When reviewing the congestion analysis at Site 71 as well as Sites 50 and 60, which incorporated average peak hour travel speeds and accessibility levels, including Mobile Network Data (MND), Bus Accessibility and Public Transport Accessibility Levels (PTAL), it is noted that the sites score favourably when compared to other sites within the Local Plan.

5.6.5 The peak-hour speed ratios for each site, representing their performance in terms of congestion is shown in Table 5.3.

Table 5.3 Transport Network Analysis Review

Site	AM Peak Speed Ratio (08:00 – 09:00)	PM Peak Speed Ratio (17:00 – 18:00)	Average Speed Ratio	Score
50	85.4%	91.3%	88.4%	6
61	70.9%	86.8%	78.8%	5
71	76.2%	86.0%	81.1%	6

5.6.6 Table 5.3 illustrates that Site 71 performs well in terms of traffic flow efficiency, placing it in the highest performance band, alongside Site 50.

5.6.7 This indicates that the site scores well with regard to congestion during peak hours, comparable to the best-performing employment sites being brought forward within the RBC Local Plan Review. In contrast, Site 61, while still performing well, sits in Category 5, suggesting slightly greater pressure on the road network.

5.6.8 On this basis, given Sites 50 and 61 have been taken forward with the next stage of the Local Plan Review, Site 71 performs equally well, and therefore from a potential transport impact perspective, there is no reason why Site 71 could not also be delivered.

5.7 Summary

5.7.1 A high level trip generation and distribution has been undertaken, which sets out that the development proposals could result in between 100-300 two-way vehicle movements. These movements are likely to be relatively evenly distributed on the A45 to the north west and south east.

5.7.2 HGV movements are likely to route to the nearby motorway junctions and avoid routing through villages, which is preferred.

5.7.3 Notwithstanding the above, it is important to note that the supporting evidence provided by SLR shows that the site scores well with regard to congestion and indeed is comparable to Sites 50 and 61. Given Sites 50 and 61 have been taken forward to the Local Plan Review, Site 71 is also considered to be acceptable with regard to likely traffic impacts on the surrounding highway network.

5.7.4 However, any future planning application would seek to assess the likely impacts of Site 71 as well as cumulative impacts of nearby allocated sites, with appropriate highways mitigation in the form of junction improvements of sustainable transport improvements identified.

6. Summary

6.1.1 This document has been prepared by mode transport planning (mode) in support of a renewed representation for the allocation of London Road, Ryton-on-Dunsmore, known as Site 71, outlining its viability and sustainability from a highways and transport standpoint.

6.1.2 The following is set out within this Transport Appraisal:

- The site is considered to be in a sustainable location, benefiting from good access to the Strategic Road Network (SRN), established employment clusters, and sustainable travel connections.
- The site is noted to be comparable to Sites 50 and 61, which have been taken forward as part of the RBC Local Plan Review. Given the similarities of these sites and Site 71, the site is considered to offer alternatives to the private car and therefore aligns with local and national policy guidance.
- The concept masterplan for Site 71 proposes approximately 70,600 sqm of flexible use classes, split across 7 units.
- Vehicular access to the site is proposed via a new roundabout on the A45 London Road. The junction will be designed to accommodate forecasted traffic and includes measures to change the characteristics of the area in the vicinity of Ryton-on-Dunsmore, improving highway safety.
- Pedestrian access will be enhanced through new footways delivered as part of the site access design, with connections to the existing Public Rights of Way (PROWs). Internal footways will ensure safe and accessible routes throughout the site.
- Further improvements to sustainable transport access will also be investigated through improving existing bus services and/or the provision of new bespoke shuttle bus services from key transport nodes and urban centres.
- Parking provision will be delivered in line with Warwickshire County Council's adopted parking standards, with appropriate levels of car, HGV and accessible spaces across the development. Cycle and electric vehicle charging points will also be provided.
- Delivery and servicing arrangements will be provided in line with relevant design guides.
- Trip generation has been estimated based on the adjacent Prologis Park scheme (understood to be largely built out), and these commuting trips are likely to be distributed relatively evenly to the south east and north west of the site on the A45. The trip generation and distribution assessments provided within this report will be subject to further review.
- The supporting evidence of the Local Plan Review demonstrates that Site 71 scores well with regard to congestion on the network and is comparable to the scores of both Sites 50 and 61.

6.1.3 On the basis of the contents set out within this Transport Appraisal, Site 71 is considered to be suitable from a highways and transport perspective for allocation within the emerging Rugby Borough Local Plan.

6.1.4 Indeed, it has also been demonstrated that the site is comparable to Sites 50 and 61 with regard to accessibility and likely highways impacts. Given that both sites have been taken forward to the next stages of the RBC Local Plan, this further supports the site to be reconsidered for allocation with the RBC Local Plan Review.

mode
transport planning

APPENDICES

APPENDIX A

Concept Masterplan

Concept Masterplan

mode

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