



ARCHITECTURE
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ENVIRONMENT



LANDSCAPE APPRAISAL & GREEN BELT ASSESSMENT

LAND WEST OF FOSSE WAY, STRETTON-ON-DUNSMORE

MARCH 2026 | LA5851-LVA-GBA-01B

Quality Assurance

ISO 9001 & 14001 Registered Firm

IDP Landscape Ltd is a practice of Chartered Landscape Architects and a registered company with the Landscape Institute. The opinions expressed within this document are those of qualified Landscape Architects and Ecological Surveyors, whose professional judgement is relied upon.

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Contents

01 Introduction.....	4
02 LVA Methodology	6
03 Legislation, Local Policy & Guidance	9
04 Baseline Assessment	13
05 Green Belt Assessment - Methodology	16
06 Green Belt Assessment	22
07 Assessment Summary	26
08 Conclusions.....	29

Figures

Figure. 01. Site Location Plan	5
Figure. 02. Policy Context and Designations	14
Figure. 03. ... Landscape Character Areas.....	16
Figure. 04. ... VIEWPOINT LOCATION PLAN	18
Figure. 05. Joint Green Belt Study 2015 - map of Parcel SD2	26
Figure. 06. ... Landscape Analysis of the Site	31
Figure. 07. Indicative Masterplan.....	31

Appendices

Appendix 1. Viewpoint Photo-sheets



01 Introduction

INTRODUCTION

- 1.1. IDP Landscape Ltd are appointed by Ashberry Strategic Land to provide a Landscape and Green Belt Assessment for a land parcel to the West of Fosse Way, Stretton-on-Dunsmore. The site is being considered for its potential for strategic promotion in the emerging Local Plan. It is worth noting that the site has a draft allocation in the Rugby Borough Local Plan 2045 (Preferred Options) document
- 1.2. The Site is located at the north of the village of Stretton-on-Dunsmore, comprising a single field that is currently fallow with areas of trees and colonising scrub.

Purpose of the report

- 1.3. The objective and parameters of this document are to:
 - review a defined parcel of land (the Site) that is currently designated as Green Belt against the purposes set out in the National Planning Policy Framework (NPPF 2024, paragraph 143).
- 1.4. This assessment has been carried out by suitably qualified landscape professionals, providing impartial judgements that are based on training and experience, and through clear and transparent methods outlined in the methodology.

Scope and Extent of Study Area

- 1.5. The Study Area is considered to be 3km radius from the centre of the Site, to account for the range of landscape and visual receptors likely to be affected within this setting.
- 1.6. The components of this report include a planning policy review; baseline studies to establish landscape and visual receptors; a description of the proposed scheme; and identification and description of the likely effects arising from the proposals.

METHODOLOGY

Overview

- 1.7. The methodology is separate for the two objectives as outlined in 1.3 above. The appraisal of landscape and potential visual receptors will be in accordance with the Guidelines for Landscape

and Visual Impact Assessment Third Edition 2013 (GLVIA3). However, as the study is an initial appraisal and not a full LVIA, the assessment will not include verified views or detailed judgements based on precise architectural proposals, and has not been consulted on by the Local Authority.

- 1.8. There is no national adopted methodology on the details how a Green Belt Purposes Assessment should be undertaken. The previous Green Belt study commissioned jointly by Coventry City Council, Nuneaton & Bedworth Borough Council, Rugby Borough Council and Warwick District Council has been reviewed and similar elements are contained within the Methodology of this report.
- 1.9. The Government have provided guidance on the role of Green Belt in the planning system, via the GOV.UK website, last updated 27th February 2025. This outlines the below considerations of relevance to this assessment:
 - The considerations involved in assessing the contribution Green Belt land makes to Green Belt purposes, where relevant to identifying grey belt land;
 - The considerations involved in determining whether release or development of Green Belt land would fundamentally undermine the remaining Green Belt in the plan area;
 - Guidance for considering proposals on potential grey belt land;
 - Updated guidance on how to consider the potential impact of development on the openness of the Green Belt.
- 1.10. Precedent Green Belt Reviews and assessment methodologies from other studies and consultants, along with the above mentioned guidance and IDP's own experience, have been considered in writing the methodology steps. Professional judgement will be used in line with the methodology framework to make assessments on the contribution of the Site to the Green Belt purposes.
- 1.11. The methodology for the Landscape Appraisal and Green Belt Assessment is set out separately in more detail in their respective chapters.



Figure. 01. Site Location Plan



02 LVA Methodology

Introduction

2.1. The overall process within this assessment is outlined in the following flow chart (Slide 1) based on figures produced in the Guidelines¹ detailing steps in the assessment of landscape effects and visual effects. However, as this is a Landscape and Visual appraisal, rather than an Impact Assessment, the following components are not included:

- Consideration of site alternatives
- Screening
- Scoping
- Assessing significance of effects
- Mitigation proposals

BASELINE CONDITIONS

Landscape Baseline

2.2. Baseline studies require a mix of desk study and fieldwork to identify and record the character of the landscape, as well as the elements, features and aesthetic and perceptual factors which contribute to it. For landscape effects the study area should cover the proposed project Site and the wider landscape context within which the proposals may influence landscape character and the full extent of any neighbouring features of special value (e.g. designated areas including AONBs, Historic Parks, Conservation Areas etc.) to reflect the setting of that feature.

2.3. Published Landscape Character Assessments prepared by the Local Authorities have formed the basis of the desk study, followed by the site-specific assessment to identify landscape receptors. The process involves the assessment of a combination of physical (e.g. landform, vegetation, buildings), aesthetic/perceptual (e.g. scale, appearance, tranquillity) and cultural/social (e.g. human interaction, landuse, heritage) aspects which together make up the character of the area and its value. An assessment is also made as to the quality, or condition, of the landscape, which involves consideration of the physical state of the landscape and of the

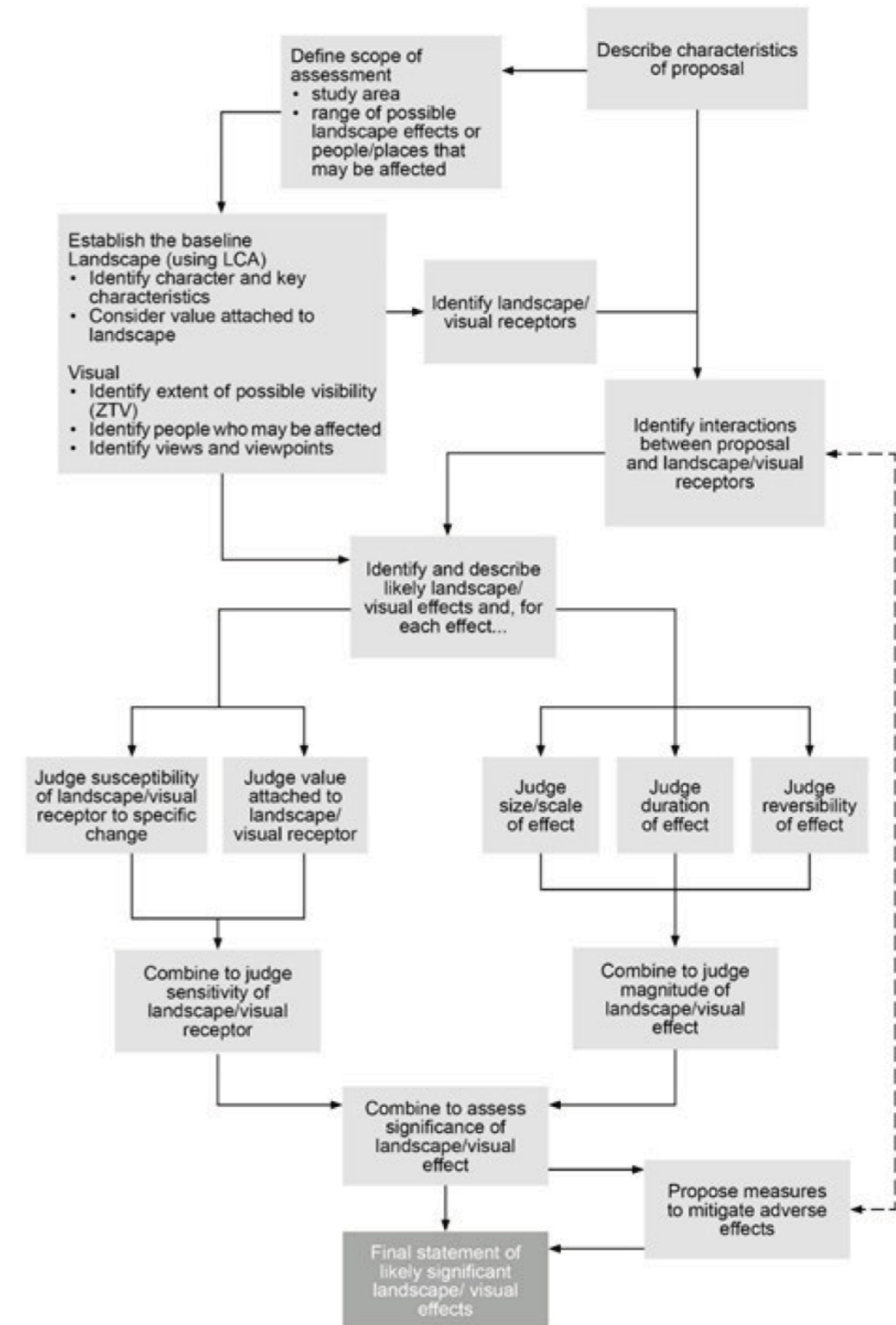
features and elements which make up landscape character.

Landscape Value

2.4. Landscape value is defined in the Guidelines as *“the relative value that is attached to different landscapes by society, bearing in mind that a landscape may be valued by different stakeholders for a whole variety of reasons”*². Landscapes or their component parts may be valued at community, local, national or international levels. Internationally or nationally valued landscapes are recognised by designation which have a formal statutory basis, however if an area of landscape is undesignated does not mean that it does not have any value. Landscape value can be assessed through identification of a number of factors that are considered to define the value of a landscape.

2.5. The assessment of landscape value is evaluated using factors that are generally agreed to influence value, set out in **Table 1** below, following recent guidance by the Landscape Institute on assessing landscape value outside National designations³. These factors listed in the Guidance are not fixed but should be appropriate to the particular project and location, and where appropriate, discussed with the relevant planning authority or statutory consultees.

2.6. Once evidence for each factor has been collated and assessed, it is important to judge the overall ‘weight of evidence’ in coming to an overall judgement on landscape value.



1 Guidelines for Landscape and Visual Impact Assessment Third Edition 2013 (GLVIA3)

2 GLVIA3 paragraph 5.19

3 Landscape Institute Technical Guidance Note 02-21 'Assessing Landscape Value outside National Designations'

Slide. 1. Steps in assessing landscape/visual effects

Table 1. Factors that influence Landscape Value

Factor	Description Of Value	Example Indicators	Factor	Description Of Value	Example Indicators	Factor	Description Of Value	Example Indicators
NATURAL HERITAGE	Landscape with clear evidence of ecological, geological, geomorphological or physiographic interest which contribute positively to the landscape.	<ul style="list-style-type: none"> • Presence of wildlife and habitats of ecological interest that contribute to sense of place. • Extent and survival of semi-natural habitat that is characteristic of the landscape type. • Presence of distinctive geological, geomorphological or pedological features. • Landscape which contains valued natural capital assets that contribute to ecosystem services, for example distinctive ecological communities and habitats that form the basis of ecological networks. • Landscape which makes an identified contribution to a nature recovery/ green infrastructure network. 	DISTINCTIVENESS	Landscape that has a strong sense of identity	<ul style="list-style-type: none"> • Landscape character that has a strong sense of place (showing strength of expression of landscape characteristics). • Presence of distinctive features which are identified as being characteristic of a particular place. • Presence of rare or unusual features, especially those that help to confer a strong sense of place or identity. • Landscape which makes an important contribution to the character or identity of a settlement. • Settlement gateways/approaches which provides a clear sense of arrival and contribute to the character of the settlement (may be ancient/historic). 	PERCEPTUAL (WILDNESS AND TRANQUILLITY)	Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies	<ul style="list-style-type: none"> • High levels of tranquillity or perceptions of tranquillity, including perceived links to nature, dark skies, presence of wildlife/ birdsong and relative peace and quiet. • Presence of wild land and perceptions of relative wildness (resulting from a high degree of perceived naturalness, rugged or otherwise challenging terrain, remoteness from public mechanised access and lack of modern artefacts). • Sense of particular remoteness, seclusion or openness • Dark night skies. • A general absence of intrusive or inharmonious development, land uses, transport and lighting
CULTURAL HERITAGE	Landscape with clear evidence of archaeological, historical or cultural interest which contribute positively to the landscape	<ul style="list-style-type: none"> • Presence of historic landmark structures or designed landscape elements (e.g. follies, monuments, avenues, tree roundels). • Presence of historic parks and gardens, and designed landscapes. • Landscape which contributes to the significance of heritage assets, for example forming the setting of heritage assets (especially if identified in specialist studies). • Landscape which offers a dimension of time depth. This includes natural time depth, e.g. presence of features such as glaciers and peat bogs and cultural time depth e.g. presence of relic farmsteads, ruins, historic field patterns, historic rights of way (e.g. drove roads, salt ways, tracks associated with past industrial activity). 	RECREATIONAL	Landscape offering recreational opportunities where experience of landscape is important	<ul style="list-style-type: none"> • Presence of open access land, common land and public rights of way (particularly National Trails, long distance trails, Coastal Paths and Core Paths) where appreciation of landscape is a feature. • Areas with good accessibility that provide opportunities for outdoor recreation and spiritual experience/ inspiration. • Presence of town and village greens. • Other physical evidence of recreational use where experience of landscape is important. • Landscape that forms part of a view that is important to the enjoyment of a recreational activity 	ASSOCIATIONS	Landscape which is connected with notable people, events and the arts	<ul style="list-style-type: none"> • Associations with well-known literature, poetry, art, TV/film and music that contribute to perceptions of the landscape. • Associations with science or other technical achievements. • Links to a notable historical event. • Associations with a famous person or people
LANDSCAPE CONDITION	Landscape which is in a good physical state both with regard to individual elements and overall landscape structure	<ul style="list-style-type: none"> • Good physical condition/ intactness of individual landscape elements (e.g. walls, parkland, trees). • Good health of elements such as good water quality, good soil health. • Strong landscape structure (e.g. intact historic field patterns). • Absence of detracting/ incongruous features (or features are present but have little influence). 	PERCEPTUAL (SCENIC)	Landscape that appeals to the senses, primarily the visual sense	<ul style="list-style-type: none"> • Distinctive features, or distinctive combinations of features, such as dramatic or striking landform or harmonious combinations of land cover. • Strong aesthetic qualities such as scale, form, colour and texture. • Presence of natural lines in the landscape (e.g. natural ridge-lines, woodland edges, river corridors, coastal edges). • Visual diversity or contrasts which contributes to the appreciation of the landscape. • Memorable/ distinctive views and landmarks, or landscape which contributes to distinctive views and landmarks. 	FUNCTIONAL	Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape	<ul style="list-style-type: none"> • Landscapes and landscape elements that contribute to the healthy functioning of the landscape, e.g. natural hydrological systems/ floodplains, areas of undisturbed and healthy soils, areas that form carbon sinks such as peat bogs, woodlands and oceans, areas of diverse landcover (benefits pest regulation), pollinator-rich habitats such as wildflower meadows. • Areas that form an important part of a multifunctional Green Infrastructure network. • Landscapes and landscape elements that have strong physical or functional links with an adjacent national landscape designation or are important to the appreciation of the designated landscape and its special qualities.

Visual Baseline

- 2.7. The baseline studies for visual effects will establish the geographic area in which the development may be visible from, and the different groups of people (receptors) who may experience views of the development. These receptors have been illustrated through a number of specific/representative viewpoints that are reasonable and proportional to the scale and nature of the proposed development. The locations of these photographs have been agreed with the Local Authority at an early stage and this communication has been recorded.
- 2.8. The visual baseline has been informed by a desktop study to provide information on where, theoretically, the proposal is visible from, and this has been refined by fieldwork to confirm which visual receptors will be identified.
- 2.9. Likely visual receptors who will be affected by the changes in views and visual amenity include users of open access land, public rights of way, the public highway or other transport routes, local residents, and those at work. Views and viewpoints to represent these receptors have been recorded with panoramic images produced in line with the Landscape Institute technical guidance on 'Visual Representation of Development Proposals'⁴. Data such as the camera, the field of view and weather conditions have been recorded for clarity of information.

Value of views

- 2.10. The nature, composition and characteristics of the existing views experienced at each viewpoint have been recorded as well as an assessment of value attached to that view. Recognition of the value attached to particular views has taken into account the presence of heritage assets or planning designations, appearance in guidebooks or maps, provision of facilities for their enjoyment (viewpoints, benches, information boards), or specific references in literature/art.
- 2.11. The visual receptors most susceptible to change are generally likely to include

- *Residents at home;*
 - *People engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape or particular views;*
 - *Visitors to heritage assets or other attractions, where views of surroundings are an important contributor to the experience;*
 - *Communities where views contribute to the landscape setting enjoyed by residents in the area;*
 - *Travellers on road, rail or other transport routes tend to fall into an intermediate category of susceptibility to change. Where travel involves recognised scenic routes awareness of views is likely to be particularly high.⁵*
- 2.12. Visual receptors likely to be less sensitive to change include:
- *People engaged in outdoor sport or recreation which does not involve or depend upon appreciation of views of the landscape;*
 - *People at their place of work whose attention may be focused on their work or activity, not on their surroundings.⁶*

ASSESSMENT OF EFFECTS

- 2.13. Determining the significance of effects is a requirement of the LVIA process through an evidence-based process combined with professional judgement. The process must consider the direct effects and any indirect, secondary, cumulative, short-, medium- and long-term, permanent and temporary, as well as positive and negative effects of the development.
- 2.14. It is not for this review to provide the assessment of effects in relation to Green Belt land. It is considered that well-designed new development can make a positive contribution to the landscape and need not always be hidden or screened.

Landscape Effects

- 2.15. The sensitivity of the landscape receptor would be identified by combining judgements of the susceptibility to the type of change or development proposed with the value attached to the landscape as established in the baseline study.
- 2.16. Susceptibility is the ability of the landscape

receptor (whether it be the overall character or quality/condition of a particular landscape type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation .

- 2.17. The overall landscape sensitivity for each receptor has then been categorised balancing the judgements made on the value attached to the receptor and the susceptibility to the type of change arising from the specific proposal. These are categorised into High, Medium, and Low and described in **Table 2**.

Visual Effects

- 2.18. Individual visual receptors would be identified and assessed in terms of their susceptibility to change in views and visual amenity, and the value attached to those views. The susceptibility varies depending on the occupation or activity of the receptor (people) experiencing the view at particular locations, and the extent to which their attention is focused on the views and the visual amenity they experience from that viewpoint.



⁴ Landscape Institute Technical Guidance Note 06/19 17th September 2019

⁵ GLVIA3 paragraph 6.33

⁶ GLVIA3 paragraph 6.34

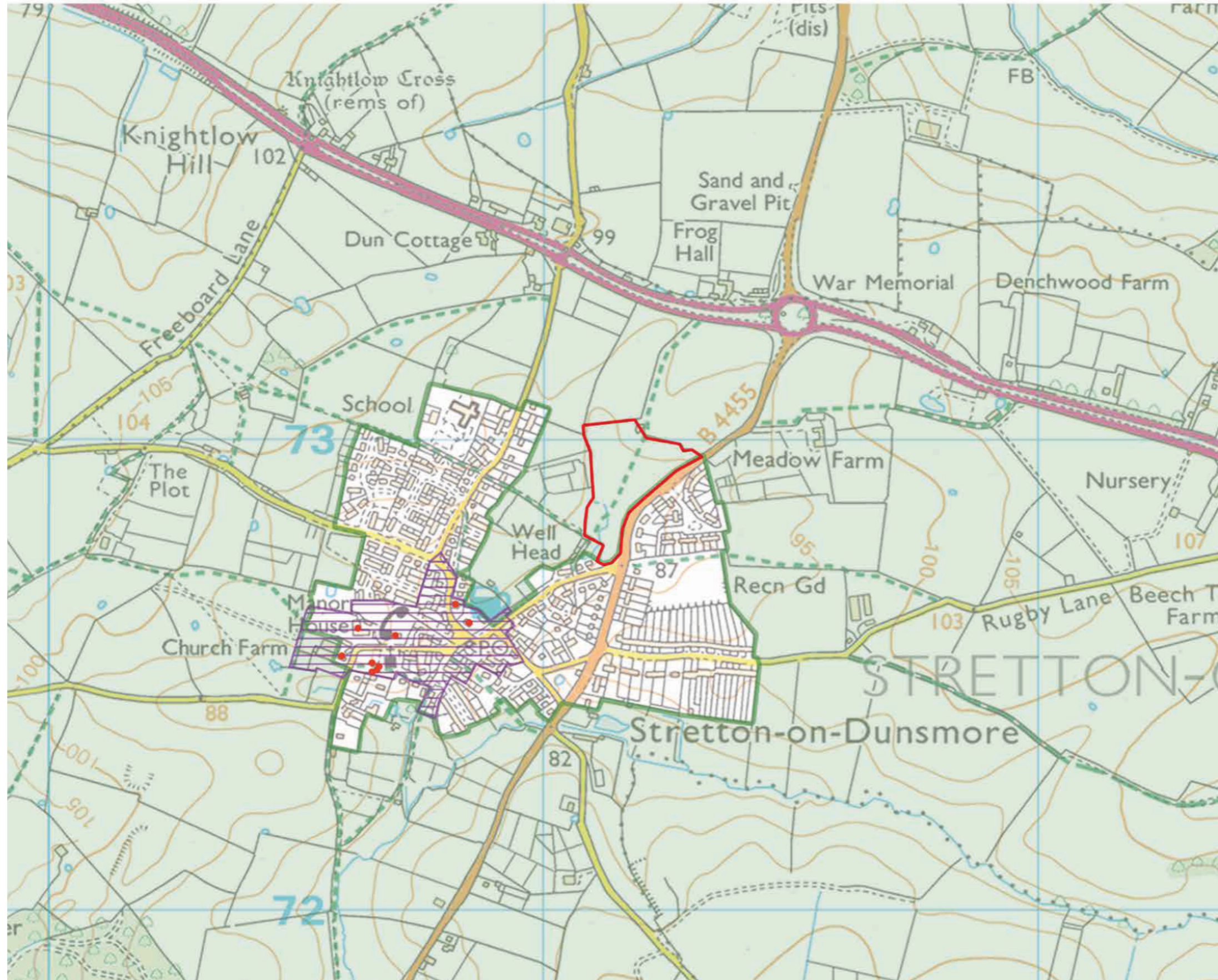
03 Legislation, Local Policy & Guidance

NATIONAL POLICY

National Planning Policy Framework (NPPF) (DEC 2024)

- 3.1. The NPPF promotes a presumption in favour of sustainable development, defined as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs', providing it is in accordance with the relevant up to date Local Plan and policies set out in the NPPF.
- 3.2. Chapter 12 on 'Achieving Well-Designed & Beautiful Places' in paragraph 135 states that planning policies and decisions should ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change....
- 3.3. Chapter 15 'Conserving and Enhancing the Natural Environment' in paragraph 187 states that planning policies and decisions should contribute to and enhance the natural and local environment by:
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.
- 3.4. The site lies within the Green Belt and therefore is covered by policies in Chapter 13 'Protecting Green Belt land'.
- 3.5. Paragraph 142 of the NPPF states that:
- 'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'*
- 3.6. Paragraph 144 of the NPPF clearly sets out the five purposes that Green Belt is designated for:
- 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.
- 3.7. The NPPF is clear in its instructions regarding the amendment of Green Belt boundaries, stating in paragraph 145:
- 'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans.'*
- 3.8. Regarding the openness of villages within the Green Belt, the NPPF states:
- 'If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.'*
- 3.9. The NPPF is also clear about the role that Green Belts should play in providing benefits beyond visual 'openness':
- 'Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. Where Green Belt land is released for development through plan preparation or review, the 'Golden Rules' in paragraph 156 below should apply.'*
- 3.10. Other than amendment of Green Belt boundaries through Local Plan Review, applications that adhere to 'very special circumstances' may also be approved. Paragraph 153 of the NPPF states:
- 'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'*
- 3.11. In respect of residential development opportunity in Green Belt land, paragraph 155 makes this clear:
- 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 Framework⁵⁷; and
 - d) Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.
- 3.12. The 'Golden Rules' referred to in (d) above are stated as follows:
- Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or*
- review⁵⁸, or on sites in the Green Belt subject to a planning application⁵⁹, the following contributions ('Golden Rules') should be made:*
- a) affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;
 - b) necessary improvements to local or national infrastructure; and
 - c) the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through on-site provision or through access to off-site spaces.
- 3.13. Advice on the role of Green Belt land in the planning system has been published and updated (27 February 2025) by the Government on the GOV.UK website. This includes guidance on Purposes A, B and D in defining the illustrative features of Strong, Moderate or Weak contributions by land parcels to the Green Belt. The guidance goes on to state:
- 'After consideration of the above criteria, any assessment area that is not judged to strongly contribute to any one of purposes a, b, or d can be identified as grey belt land, subject to the exclusion of land where the application of the policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development'*
- 3.14. 'Grey belt' land is defined in the NPPF as follows:
- 'Grey belt: 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.'*

Figure. 02. Policy Context and Designations



KEY

-  Site location boundary
-  Green Belt
-  Conservation Area
-  Listed Buildings

LOCAL PLANNING POLICY

Current Local Plan

- 3.15. Rugby Borough are conducting a Local Plan Review and are currently consulting on the Preferred Option Consultation Document following the adoption of Local Plan 2019. Once adopted, the Revised Local Plan will set out the planning policies and local growth strategy including for new homes, jobs and infrastructure.
- 3.16. The current Adopted Local Plan 2019 has several policies relevant to the Site and suitability to development.

Policy GP1: Securing Sustainable Development

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

Policy GP2: Settlement Hierarchy-

Green Belt: New development will be resisted; only where national policy on Green Belt allows will development be permitted.

Policy NE2: Strategic Green and Blue Infrastructure:

Where appropriate new developments must provide suitable Green and Blue Infrastructure corridors throughout the development and link into adjacent strategic and local Green and Blue Infrastructure networks or assets where present..

Policy NE3: Landscape Protection and Enhancement The Broxbourne

New development which positively contributes to landscape character will be permitted. Development proposals will be required to demonstrate that they:

- *Integrate landscape planning into the design of development at an early stage;*
- *Consider its landscape context, including the local distinctiveness of the different natural and historic landscapes and character, including tranquillity;*

- *Relate well to local topography and built form and enhance key landscape features, ensuring their long term management and maintenance;*

- *Identify likely visual impacts on the local landscape and townscape and its immediate setting and undertakes appropriate landscaping to reduce these impacts;*

- *Aim to either conserve, enhance or restore important landscape features in accordance with the latest local and national guidance;*

- *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; and*

- *Are sensitive to an area's capacity to change, acknowledge cumulative effects and guard against the potential for coalescence between existing settlements*

Policy SDC1: Sustainable Design

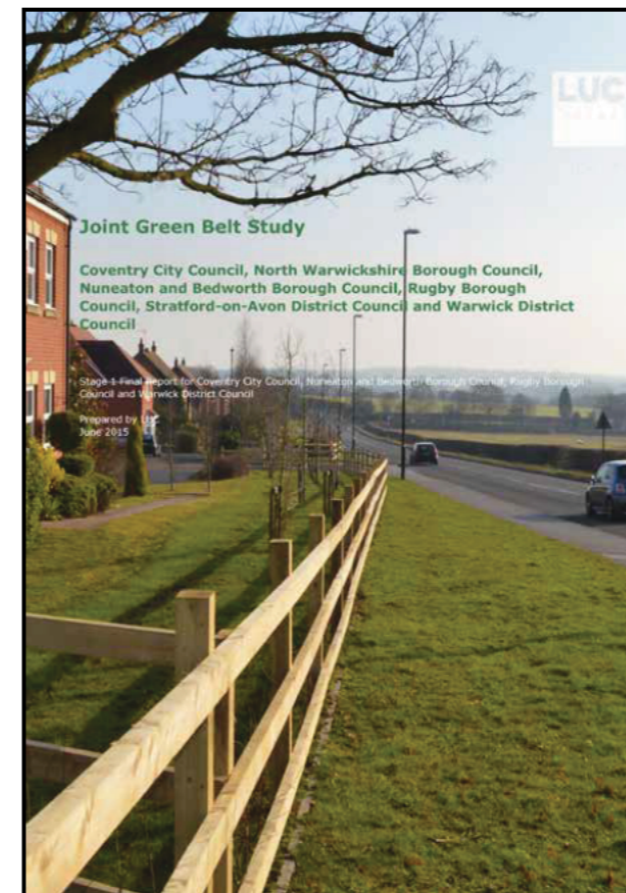
All development will demonstrate high quality, inclusive and sustainable design and new development will only be supported where the proposals are of a scale, density and design that responds to the character of the areas in which they are situated. All developments should aim to add to the overall quality of the areas in which they are situated.

Policy SDC2: Landscaping

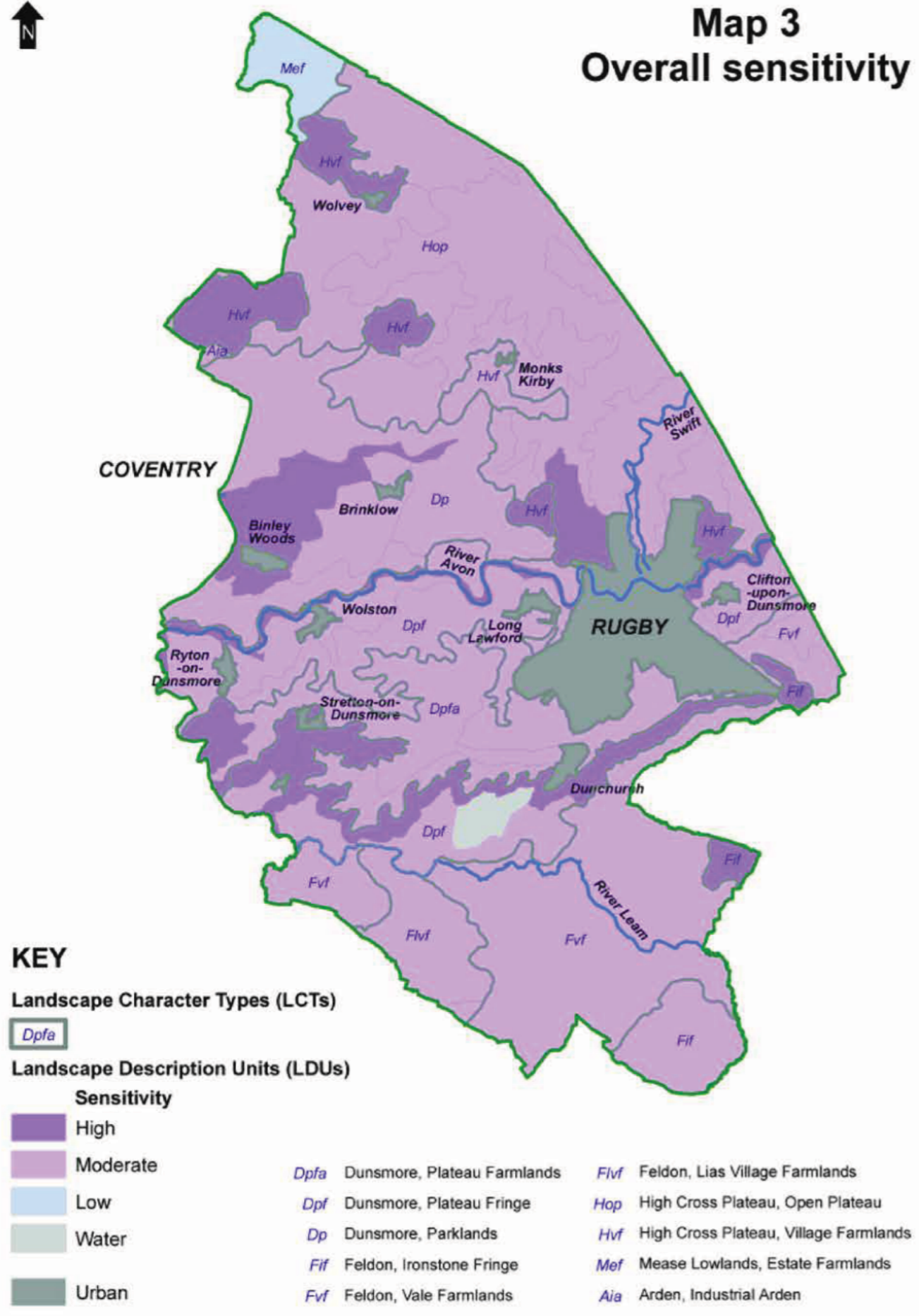
The landscape aspects of a development proposal will be required to form an integral part of the overall design.

Joint Green Belt Study (June 2015)

- 3.17. The Stage 1 Final Report was prepared for Coventry City Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council and Warwick District Council. The study assessed the Green Belts, as set out in the National Planning Policy Framework (NPPF). Its purpose was not to identify land for removal from or addition to the Green Belt but to provide a comprehensive evidence base to appraise and arrive at the most sustainable pattern of development. Further analysis of this report is detailed later in this assessment.



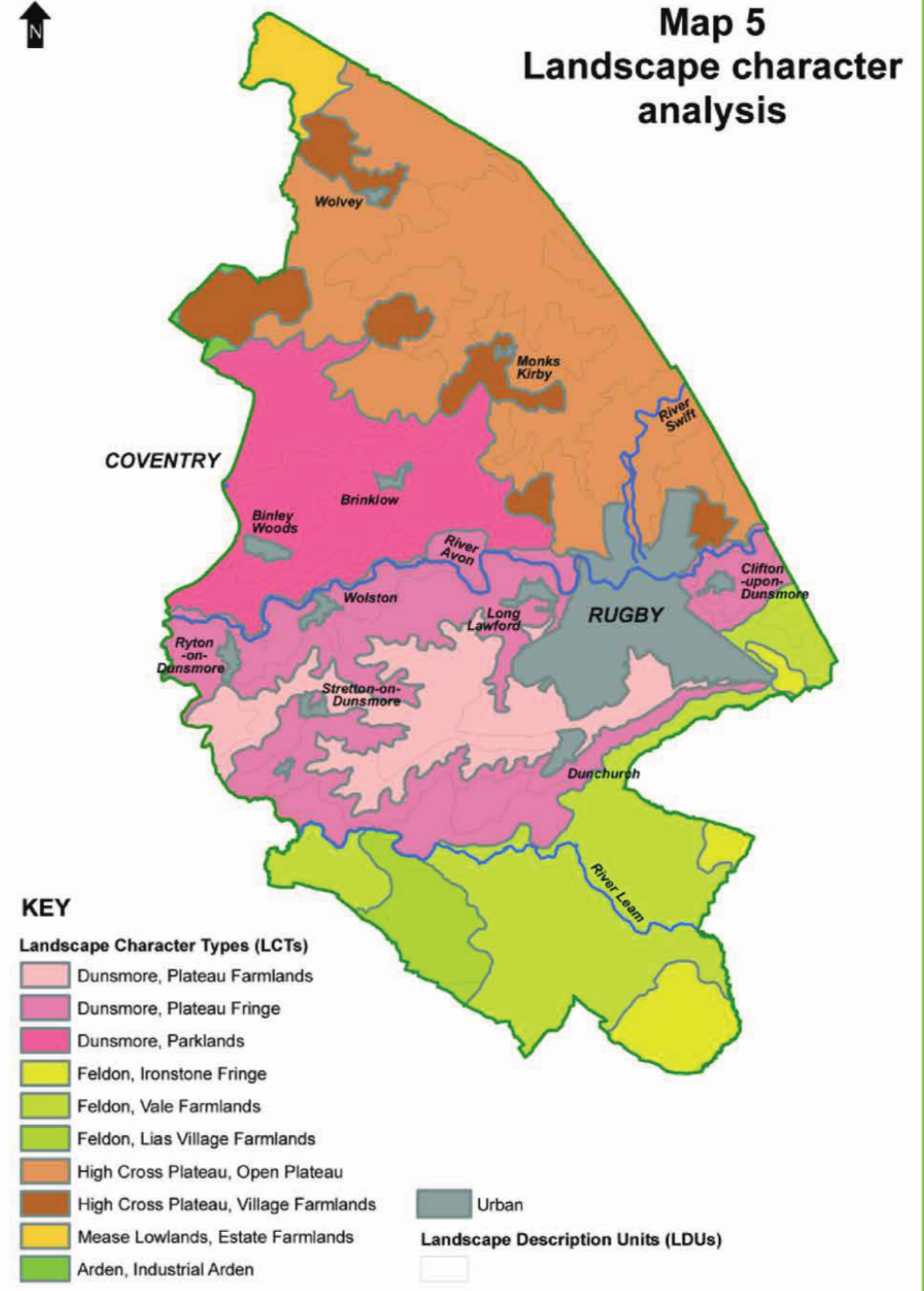
Map 3 Overall sensitivity



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NOT TO SCALE

Map 5 Landscape character analysis



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NOT TO SCALE

04 Baseline Assessment

SITE DESCRIPTION

- 4.1. The site covers an area of 3.5 hectares to the west of B4455 Fosse Way in Stretton-on-Dunsmore. It is bound by residential development to the east to the other side of Fosse Way, and properties off Brookside to the south. The site is enclosed by existing hedgerows and trees around the periphery, with some mature Oak trees to the roadside. The Fosse Way is the main route into the village from the A45, with the main core to the southwest set around a traditional village green.
- 4.2. The site lies immediately adjacent to the settlement boundary, within land designated as Green Belt. The fundamental aim of Green Belt policy, as set out in the NPPF, is to prevent urban sprawl by keeping land permanently open.
- 4.3. The current situation is paddocks and rough grassland, with a composition of hedgerows, tree groups and scruffy vegetation, with occasional shelter belt planting.
- 4.4. There is a mature hedgerow along the western side of Fosse Way, which separates the road from the site, although there are some gaps that provide glimpsed views in. There is a discernible edge to this area along the north of the site where the land use changes to large scale arable fields and the topography ascends to the A45.
- 4.5. The topography of the site has a slight fall from north to south in a minor valley resulting in limiting the visibility of the site from the wider landscape. There are a number of hydrological features within the area including a high proportion of ponds, and Stretton brook that emerges near the site at Well Head and flows south through the village, culverted in a number of places to meet a larger watercourse to the south.
- 4.6. The landscape has a rolling topography of interlocking plateaus and small valleys containing springs and tributaries. Stretton-On-Dunsmore lies within a hollow surrounded by upland landscape. The village is therefore relatively well contained by topography.
- 4.7. There is a single Public Right of Way running through the site linking the A45 with Brookside between houses at the southern end of the site. Other footpaths lead out of the village to the east and to the west.

DISTRICT/LOCAL LANDSCAPE CHARACTER

- 4.8. Warwickshire County Council have produced a Landscape Guidelines document that has classified the landscape character areas (LCAs) in the local area along with a description of the key characteristics that make up the fabric of the landscape. The site has been identified as lying in the Dunsmore character area and the Plateau Fringe Landscape Character Type (LCT). The overall character and qualities of 'Plateau Fringe' are described as:

"A rather variable, often large scale farmed landscape with a varied undulating topography and characterised by nucleated settlement pattern of small, often shrunken villages."

Characteristic features

- *An undulating topography of low rounded hills and narrow meandering river valleys.*
- *Large, arable fields, often with a poorly defined field pattern.*
- *Pockets of permanent pasture and smaller hedged fields, usually associated with more steeply sloping ground.*
- *A nucleated settlement pattern typically comprising loose clusters of dwellings.*
- *Isolated, brick built farmsteads.*

- 4.9. The assessment for the Borough of Rugby follows the same characterisation with some refinement to the extent of each Landscape Character Type (LCT). Further work has been done on the LCTs with the results of the sensitivity analyses considered.

- 4.10. The landscape and visual sensitivity has been assessed in the document with reference to particular key elements that define the character of a particular landscape. The analysis of sensitivity look separately at the **fragility** of the inherent (**natural and cultural**) pattern and the degree of **visibility** within each landscape. The 'Plateau Fringe' is described as follows:

Sensitivity - Fragility: Cultural sensitivity is moderate due to the historic, coherent pattern within this LCT. Ecological sensitivity is low with the exception of: the moderately sensitive steeper slopes of southern escarpment which

fall towards Feldon; and the highly sensitive River Avon.

Sensitivity - Visibility: Visibility is generally moderate due to the presence of small woods and trees superimposed over a rolling topography. On the slopes of the southern escarpment, however, visibility is high.

Overall sensitivity: With the exception of the southern escarpment and the River Avon, overall sensitivity is moderate, with visibility being the limiting factor.

Condition: To the north, the Plateau Fringe is generally in decline with the exception of an area of parkland between the River Avon and Long Lawford, and land around Church Lawford and King's Newnham, where the condition is strong. The southern fringe or escarpment on the other hand, is not only highly sensitive, but also largely in strong condition, making this an important feature to the south of the town.

- 4.11. The assessment in the supporting text describes that for the most part the character is a large-scale, intensively farmed agricultural landscape, characterised by large arable fields, often with a poorly defined field pattern. *'In places, however, there are smaller scale pockets of permanent pasture and smaller hedged fields, usually associated with more steeply sloping ground'*. This would more accurately describe the site, which is a relatively small piece of land bordered by hedgerows and nestled within pastures close to the village centre. It does not share characteristics of the wider plateau fringe as this refers to the wider expanse of land that lies to the south of the village. The 'Plateau Farmlands' LCT lies immediately to the north and is a *'very distinctive landscape of gently rolling, low glacial plateau characterised by an "empty" landscape of former waste with few roads and little settlement'*.
- 4.12. The assessment does consider sensitivity of each LDU in the series of Maps included within the assessment. For the area around the site these are as follows:
 - Fragility (combination of the natural (ecological) and cultural dimensions of the landscape) - **High**
 - Visibility analysis (degree to which change is likely to cause a visual impact) - **Moderate**
 - Overall sensitivity (fragility and visibility indices

combined) - **High**

- 4.13. The extract of the full LCA description is found at Appendix 1.

National/ Local Heritage Assets

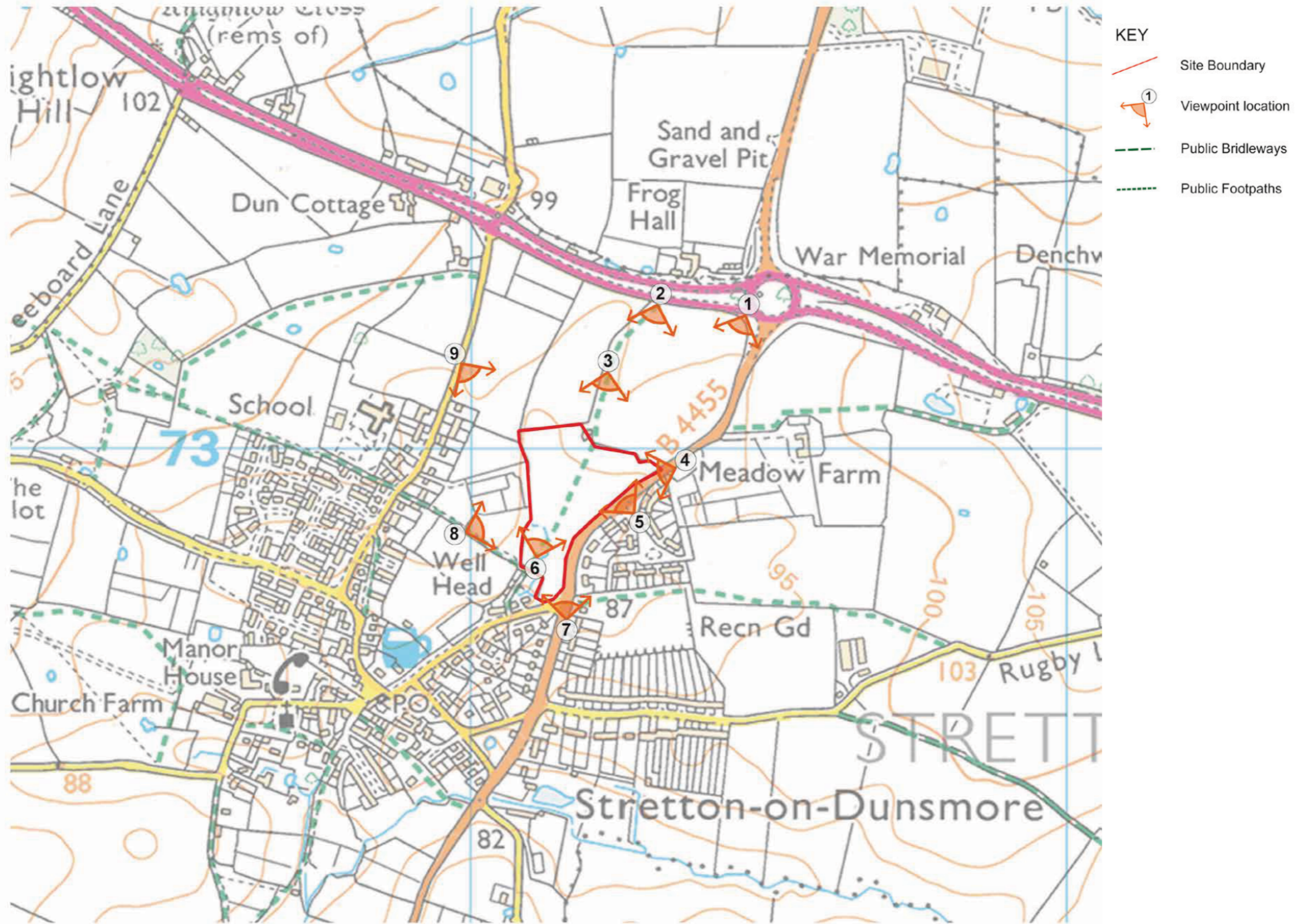
- 4.14. The site does not contain any listed or non-designated heritage assets and also lies outside of any conservation areas. There are a few Listed buildings in the village centre 350m to the south-west of the site.

Landscape Value

- 4.15. The overall value of a site within a landscape can be assessed independently by landscape practitioners against the criteria set out in Technical Guidance Note 02/21 *Assessing landscape value outside national designations* (Landscape Institute Feb 2021). The following attributes are considered to be indicators of value and are assessed as follows for the site.

- **Natural & Cultural Heritage: Medium** - The site is a single field bounded by semi-mature hedgerows with some mature trees. The site is open grassland and in areas has been left unmanaged and semi-natural habitats are present. There are no trees included in a TPO. In terms of cultural heritage there is little evidence of heritage assets, although the Fosse Way is a well-known Roman road passing the site. An established public right of way runs through the site.
- **Landscape condition: Medium** - The majority of the site is grassland with a small drainage channel leading south to a brook. The landscape structure is largely intact and remnant of the historic field patterns around the village. No significant trees or parkland exist other than the boundary vegetation.
- **Distinctiveness: Medium-Low** - There are some landscape features or characteristics of individual importance. The landscape doesn't contain any rare elements and character is typical of the LCA. There is a limited local distinctiveness of the entire Character Area, though the site makes a limited contribution to this distinctiveness due to its perceived containment and topography.
- **Recreational: Medium-Low** - The site contains a single PRoW accessed directly from the village but the rest of the site has no recreational value.

Figure. 04. Viewpoint Location Plan



04 Baseline Assessment

- **Perceptual (Scenic): Medium-Low** - The visual perception and sense of the site is primarily appreciated when using the PRoW. It is visible in glimpsed views from the north approaching the village and through the boundary vegetation in winter. Whilst the site provides some contrast which contributes to the appreciation of the landscape, its overall scenic quality is reduced by lack of management and urban influences.
- **Perceptual (Wildness & Tranquillity): Medium** - There is the perception of wildness given it's unmanaged state within the landscape of some aesthetic quality. Tranquillity is medium due to the fringe location and nearby houses and road infrastructure.
- **Functional: Medium** - the site forms part of an open gap that separates the ribbon developments along School Lane and Fosse Way in the village. There is a PRoW through the site that contributes to providing access to the countryside.
- **Associations: Low** - there are no known associations to people, events or the arts.

4.16. In summary the overall landscape value of the site is considered to be **Medium** taking into account the above factors.

VISUAL AMENITY

- 4.17. In order to analyse the visual baseline, fieldwork has been undertaken to identify the extent of visibility and thereby the people (receptors) that will be affected by the changes in views and visual amenity. This has been informed by desktop studies and field work which establishes where, theoretically, the proposals may be visible from based on topographical data, to identify the various visual receptors.
- 4.18. Site visits were conducted where locations in the local radius were visited to ensure all potential sensitive receptors have been accounted for in the Viewpoints.
- 4.19. The viewpoint locations are illustrated on the **Figure 04: Viewpoint Location Plan**. Likely visual receptors who would be affected by the changes in views and visual amenity include users of open access land, public rights of way, the public highway or other transport routes, local residents, and those at work. The viewpoints selected are reflective of the range of visual receptors (people) that are likely to be affected

by the introduction of development on the site. The panoramic images have been collated and are located in **Appendix 1** for reference.

- 4.20. Users of recreational rights of way within this landscape are of high susceptibility due to their appreciation of the landscape around them. Road users are primarily focused on the route they are travelling along and therefore have medium susceptibility. Residents within their homes and gardens would have a medium to high susceptibility depending on their outlook and situation.
- 4.21. *Viewpoint 1* is taken from the A45 junction with Fosse Way close to the war memorial. Views towards the village are filtered by vegetation and the descending topography, but the church can be seen as well as some properties during the winter months. *Viewpoint 2* is taken from the PRoW at its northern end where it meets the A45. Similarly views towards the village observe some of the existing housing development, and the northern boundary creates a definite edge to the site. *Viewpoint 3* illustrates the view from the same footpath but closer to the village.
- 4.22. *Viewpoint 4* is taken from Fosse Way on the approach into the village, with the site located to the right beyond the hedge. *Viewpoint 5* illustrates the view from Meadow Close and the eastern boundary hedge and trees that filter views into the site. *Viewpoint 6* is located within the site on the route of the PRoW and highlights the unmanaged nature of the land. *Viewpoint 7* is taken from the junction of Fosse Way with Brookside to the south of the site and within the village boundary. *Viewpoint 8* is taken from the PRoW to the west leading from School Lane with glimpsed views of the site with existing housing beyond. *Viewpoint 9* illustrates the view from School Lane to the west of the site.

VISUAL SENSITIVITY

- 4.23. The most sensitive visual receptors are those using public rights of way and routes within the open countryside, whose attention is on the setting around them. These are of High Sensitivity to change.
- 4.24. Rural roads, settlements, and common land within the landscape are likely to be High-Moderate sensitivity. Views from roads and footpaths within settlements are likely to be of Moderate to Low sensitivity.



05 Green Belt Assessment - Methodology

Methodology

- 5.1. The set of assessment criteria to be used is shown in the tables below. These criteria are based upon the five purposes of the Green Belt (NPPF paragraph 143).
- 5.2. An assessment matrix will be used to assess how the site performs against each of the Green Belt purposes to help form a preliminary conclusion on its contribution. The definitions set out in **Table 7** will help guide the assessment:
- 5.3. It is not proposed to assess Green Belt Purpose E as part of this report as it is widely considered that it is the *overall* restrictive nature of the Green Belt that encourages regeneration, not the specific restriction on a defined piece of land.
- 5.4. The primary feature of the methodology is the recognition of 'critical' Green Belt purposes. These exist where a single purpose is so fundamental to the retention of areas of land in the Green Belt that this purpose alone justifies maintaining its role as Green Belt.
- 5.5. For each Green Belt purpose, four categories have been defined against which the performance of a particular purpose may be defined for the Site being assessed:
- **'Strong'** contribution to Green Belt Purpose - where land is 'fundamental' to the purpose, justifying its continued retention and protection within Green Belt
 - **'Moderate'** contribution to Green Belt Purpose - where land is of 'considerable' importance to the Green Belt purpose, and where development would conflict substantially with it.
 - **'Weak'** contribution to Green Belt Purpose - where land is of 'minor' importance to the Green Belt purpose, and where development would conflict significantly with it.
 - **'No Contribution'** to Green Belt Purpose - where land is of no importance to the Green Belt purpose, and where development would have very limited or no discernible conflict with it.

NPPF GREEN BELT PURPOSE A

'To check the unrestricted sprawl of large built-up areas'

- 5.7. The sense of permanence provided by Green Belt is fundamental to the containment of unrestricted sprawl and it is the case that the wholesale restriction that the Green Belt places upon development ensures that the expansion outwards of urban areas remains heavily constrained, thus limiting 'sprawl'. However, well located and planned urban extensions are unlikely to constitute 'sprawl' which is a term that more closely describes the unplanned, uncontrolled spread of development.
- 5.8. The land that follows the boundary or periphery of an urban area is likely to contribute most significantly to this purpose as it is that land which provides the boundary and zone of constraint to urban expansion. The contribution to this purpose of land at increasing distance from the urban edge boundary falls away progressively.
- 5.9. The periphery of settlements may have areas where urban development has extended to boundaries that are poorly defined or weak. Other peripheral locations may have areas where the urban edge is reasonably well defined by landscape features which in turn provide containment and thereby reduce or avoid the perception of 'sprawl'. The parcel may play a role in preventing ribbon development along route ways where direct access from a development to the road would be possible. Therefore, by assessment of physical and visual attributes it is possible to determine whether further expansion will be contained and whether it would accord or conflict with this purpose.
- 5.10. Areas of land which form a strong, defined threshold between the edge of the urban area and the outlying countryside beyond. Such thresholds provide strong physical and visual containment of the urban area and protect the land further afield. These areas would be assessed as being **'strong'** in their contribution to the containment of the urban area, where there are no other similar areas that lie further from the urban edge, which could fulfil a similar function in respect of this purpose. Due to their proximity and (usually) close relationship to existing settlements, such areas may have a variable landscape character.

Table 2. Green Belt Definitions

NPPF Green Belt Purpose	Definition
a) To check the unrestricted sprawl of large built-up areas	Sprawl - spread out over a large area in an untidy or irregular way (Oxford English Dictionary online) Large built-up areas - Built-up areas are defined as land which is 'irreversibly urban in character', meaning that they are characteristic of a village, town or city. <i>Large</i> built-up areas are therefore taken to be towns and cities or any area with significant urbanisation.
b) To prevent neighbouring towns from merging	Towns - A built-up area with a name, defined boundaries, and local government, that is larger than a village and generally smaller than a city (Oxford English Dictionary online). Neighbouring Towns - Rugby and Coventry Merging - to combine or cause to combine into a single entity (Oxford English Dictionary online). This can be by way of general sprawl (see above); or Ribbon Development - the building of houses along a main road, especially one leading out of a town or village (Oxford English Dictionary online).
c) To assist in safeguarding the countryside from encroachment	Countryside - open land with an absence of built development and urbanising influences, and characterised by rural land uses including agriculture and forestry Encroachment - a gradual advance beyond usual or acceptable limits (Oxford English Dictionary online).
d) To preserve the setting and special character of historic towns	Historic town - settlement or place with historic features identified in local policy or through Conservation Area or other historic designation(s).
e) To assist in urban regeneration by encouraging the recycling of derelict and other urban land	Urban regeneration - the process of improving derelict or dilapidated districts of a city, typically through redevelopment (Oxford English Dictionary online).

05 Green Belt Assessment - Methodology

5.11. Areas of land where such thresholds are much less well defined but the land nevertheless provides a good level of containment to the urban edge, ensuring a reasonable 'fit' of the urban area within its landscape context; these areas would be categorised as **'moderate'** importance. There may be other locations, further from the urban edge that have the potential to perform a similar function if the urban area were to expand.

5.12. For land that does provide some containment to the urban area, but where the settlement has a poorly defined edge, and urban related uses may affect the character of the land beyond, the **'weak'** category would apply. There may be other features that provide an arbitrary boundary (in landscape terms) to the urban edge. In these circumstances the existing Green Belt boundary would not limit the influence of the urban area on adjoining land.

5.13. If assessment work finds that the edge of the urban area is poorly contained and has a poorly defined edge in relation to landscape features, or there is a predominance of degraded land, the parcel would be categorised as being of **'negligible'** importance with respect to this purpose as the perception of 'sprawl' is already apparent. In such locations there may be opportunities arising from development that would establish a new Green Belt boundary that provides better containment, a better 'fit' for development and that better respects landscape character.

5.14. The criteria for assessment of Purpose A has been informed by Government Planning Policy Guidance 'Advice on the role of Green Belt in the planning system' updated 27th February 2025, and are set out in the following **Table 8**:

NPPF GREEN BELT PURPOSE B

'To prevent neighbouring towns from merging'

5.15. The primary function of this purpose is clear - it is to prevent towns that are relatively close together from merging. For this strategic assessment it is assumed that all towns and villages in the study area should remain separate with a clear physical and visual distinction between them, such that they retain their separate identities and setting.

Table 3. Purpose A Green Belt Criteria Assessment

Criteria for Green Belt Purpose A. To check the unrestricted sprawl of large built-up areas		
1. Does the parcel directly abut the edge of defined settlements, or is it very close to it? Is it part of a wider group of parcels that directly act to prevent urban sprawl? 2. Does the Green Belt prevent another settlement being absorbed into the large built-up area? 3. What is the physical gap between the settlement edge of the parcel and the urban edge of defined settlements? (i.e. is there a broad gap or does it narrow at this point?) 4. What would be the remaining gap if the land is developed? 5. Would development represent an outward extension of the urban area, result in a physical connection between urban areas or lead to the danger of a subsequent coalescence between such settlements? 6. If released from the Green Belt could enduring long-term settlement boundaries be established?		
Significant importance to Green Belt Purpose Continued inclusion within Green Belt of major importance	Strong	<ul style="list-style-type: none"> Land parcel is immediately adjacent or near to a large built-up area Land parcel is <i>largely free</i> from development which would constitute 'sprawl' and has a <i>strong</i> level of openness There is a strong defensible boundary adjacent to the built-up area and therefore is containing it. If developed, result in an incongruous pattern or development (such as an extended 'finger' of development into the Green Belt).
Moderate importance to Green Belt Purpose Continued inclusion within Green Belt of some importance	Moderate	<ul style="list-style-type: none"> Land parcel is adjacent or near to a large built-up area Land parcel is <i>mostly free</i> from development which could constitute sprawl and has a fairly strong level of openness. There is a complete or partial defensible boundary adjacent to the built-up area. Have physical features in reasonable proximity that could restrict and contain development Be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development.
Slight importance to Green Belt Purpose Continued inclusion within Green Belt of limited importance	Weak	<ul style="list-style-type: none"> Land parcel is not adjacent to or near a large built-up area Land parcel <i>shows evidence</i> of urban sprawl, limiting the openness of the land parcel. There is a weak, partial or in some cases no defensible boundary adjacent to the built-up area.
Negligible importance to Green Belt Purpose Continued inclusion within Green Belt of negligible importance	No Contribution	<ul style="list-style-type: none"> Land parcel is not adjacent to a large built-up area Land parcel does not play a role in preventing the sprawl of these areas.

05 Green Belt Assessment - Methodology

It is considered on the basis that, despite the strict definition of the purpose that appears to exclude them, smaller settlements would also be relevant to the purpose. The assessment of the performance of parcels of Green Belt land against this Purpose will therefore be informed by its proximity to neighbouring settlements, and through landscape and visual assessment to determine the nature and capacity of the intervening land to accommodate development.

5.16. Where the development of a parcel of land is likely to result in physical coalescence, or at least a clearly recognisable perception of merging that would erode the distinct separate identity and character of either/both urban areas, the land would have to be considered **'strong'** in this purpose and its retention in Green Belt would be regarded as being of paramount importance.

5.17. Where there is no significant existing inter-visibility between towns, and where more limited development may be accommodated without causing merger or the perception of merging, its retention within the Green Belt would be considered to be of **'moderate'** importance to this purpose. In such areas development may lead to a noticeable reduction of the separation between urban areas.

5.18. The performance of a land parcel against this purpose will reduce with the increase and/or perception of distance between urban areas, as not all of the land is likely to be important to maintaining separation. Where development may be accommodated without compromising this purpose the parcel would be categorised as being of **'weak'** importance to the purpose.

5.19. Where a parcel of land does not lie directly between two towns or the distances between towns are so significant, it would be adjudged as being of **'no Contribution'**, as development could be accommodated without being in conflict with this purpose.

5.20. Criteria for the assessment of Green Belt Purpose B has been informed by Government Planning Policy Guidance 'Advice on the role of Green Belt in the planning system' updated 27th February 2025 and are set out in **Table 9**.

Table 4. Purpose B Green Belt Criteria Assessment

Criteria for Green Belt Purpose B. Prevent Neighbouring Towns from merging into one another		
1. Does the parcel lie directly between two towns and form all or part of a gap between them? 2. What distance is the gap between towns 3. Are there intervening settlements or other development on roads that would be affected by release from Green Belt 4. Would development in the parcel appear to result in the merging of towns or compromise the separation of towns physically? 5. Would the development of the parcel be a significant step leading towards coalescence of two settlements?		
Significant Importance to Green Belt Purpose Continued inclusion within Green Belt of major importance	Strong	<ul style="list-style-type: none"> Land Parcel constitutes <i>all or most of a gap</i> between settlements Loss of openness in this land parcel would cause visual or physical merging or <i>substantially reduce the existing gap</i> The development of land parcel would be likely to result in the loss of visual separation of towns
Moderate importance to Green Belt Purpose Continued inclusion within Green Belt of some importance	Moderate	<ul style="list-style-type: none"> Land parcel constitutes the <i>majority of a gap</i> between settlements (or does so in conjunction with other land parcels) Loss of openness would either physically or visually have a <i>negative impact on the existing gap</i>. The development of land parcel would be possible without the loss of visual separation between towns
Slight importance to Green Belt Purpose Continued inclusion within Green Belt of limited importance	Weak	<ul style="list-style-type: none"> Land parcel is <i>not pivotal in providing a gap</i> between settlements. Loss of openness in this land parcel would not cause a significant visual or physical sense of merging.
Negligible importance to Green Belt Purpose Continued inclusion within Green Belt of negligible importance	No Contribution	<ul style="list-style-type: none"> Land does not lie between two towns and makes a no contribution to separation. Land parcel does not play a role in preventing the merging of settlements

05 Green Belt Assessment - Methodology

NPPF GREEN BELT PURPOSE C

'To assist in safeguarding the countryside from encroachment'

- 5.21. Any Green Belt land around the periphery of the urban area may be said to fulfil this purpose. It is the overall restrictive nature of Green Belt Policy that protects the surrounding countryside by preventing development and directing it towards existing settlements.
- 5.22. Whilst the quality of the landscape is not a reason for designating land as Green Belt, the search for the most appropriate locations for any significant development should be informed by landscape character assessment. By applying this approach in connection with this purpose it follows that, all other considerations being equal, parcels that have a stronger rural character and no urbanising development should be afforded particular protection via this purpose, in contrast with those parcels that possess a semi-urban character and where encroachment has already occurred through urbanising elements.
- 5.23. Such areas may offer the potential for repair and/or enhancement through a well considered approach to development. *Any* urban extension may be considered as an 'encroachment' into the Green Belt. Therefore, the consideration of landscape character and the potential ability of the landscape to accommodate change fulfil an important role.
- 5.24. The criteria for assessing Purpose C are set out in **Table 10**.
- 5.25. The criteria for the consideration of landscape character and sensitivity to change has been informed by Government Planning Policy Guidance 'Advice on the role of Green Belt in the planning system' updated 27th February 2025, and are set out in **Table 11**.

Table 5. Purpose C Green Belt Criteria Assessment

Criteria for Green Belt Purpose C. To assist in safeguarding the countryside from encroachment		
Are there clear, strong and robust boundaries to contain development and prevent encroachment in the long term?		
1. Does the parcel have the character of open countryside? What is the nature of the land use in the parcel currently? Is any of the land previously developed? 2. Is the parcel partially enclosed by a town or village built up area? 3. Has the parcel been affected by a substantial increase in the mass and scale of adjacent urbanising form? 4. Is there any evidence of significant containment by urbanising built form? 5. Has there been incremental erosion of the open character of the land on the edge of the settlement (so that it appears as part of the settlement)? 6. Does there appear to be a high degree of severance from the adjacent Green Belt?		
Significant importance to Green Belt Purpose Continued inclusion within Green Belt of major importance	Strong	<ul style="list-style-type: none"> Land possesses a strong rural character which the Green Belt designation protects There may be no other fundamental constraints to encroachment, such as a strong landscape feature that could assist in fulfilling this purpose by containing development from outlying countryside
Moderate importance to Green Belt Purpose Continued inclusion within Green Belt of some importance	Moderate	<ul style="list-style-type: none"> Land possesses a predominantly rural character. There may be other minor constraints (such as a landscape feature) that would limit encroachment but where the Green Belt provides important protection.
Slight importance to Green Belt Purpose Continued inclusion within Green Belt of limited importance	Weak	<ul style="list-style-type: none"> Land possesses a semi-rural character and there is already a perception of significant encroachment. There may be other constraints to further encroachment
Negligible importance to Green Belt Purpose Continued inclusion within Green Belt of negligible importance	No Contribution	<ul style="list-style-type: none"> Land possesses a semi-rural character and is no longer perceived to be part of the countryside. It may contain degraded land that provides opportunities for enhancement

05 Green Belt Assessment - Methodology

NPPF GREEN BELT PURPOSE D

'To preserve the setting and special character of historic towns'

- 5.26. Any land around a town or urban area may be said to contribute to its setting. However, the intention of this purpose is to protect land that makes a particular contribution to those defining historic features of towns and cities rather than historic origins.
- 5.27. The purpose requires a clear view on what historic features contribute to the special character of the town and which have a direct relationship with the surrounding countryside.
- 5.28. The Joint Green Belt Study 2015 concluded that 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'*. This conclusion has implicit confirmation in the Green Belt Study in their assessment of land parcel SD2.
- 5.29. Therefore it is not considered appropriate to provide a methodology for assessment or criteria tables as any score given would result in the same negative contribution.
- 5.30. It is therefore considered that the site being assessed in this report **does not contribute** to the NPPF Green Belt Purpose D.

NPPF GREEN BELT PURPOSE E

'To assist in urban regeneration by encouraging the recycling of derelict and other urban land'

- 5.31. The LUC Joint Green Belt Study of 2015 considers that 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. Therefore it concluded that all parcels make an equally significant contribution to this purpose and are each given a maximum score.
- 5.32. For the purposes of this assessment, a review of the contribution of the site is not relevant as all parcels are treated the same and therefore neutralise each other.

Table 6. Purpose C Green Belt Landscape Character Sensitivity to Change

Landscape Character and Sensitivity to change criteria to inform Purpose C		
Little/No Capacity for Change Landscape highly sensitive to change	Strong	Land has predominantly strong rural character that is highly sensitive to change. <ul style="list-style-type: none"> Land consists of an uncontained exposed open area where the impact of development would extend over a wide area, or where there may be little/no potential to mitigate the adverse effects of changes Strategic level of development likely to have substantial adverse impacts on landscape character and/or substantial adverse impacts on landscape features that are considered to be important to the setting of the town.
Low Capacity for Change Landscape sensitive to change	Moderate	Land has predominantly intact rural character and is sensitive to change. <ul style="list-style-type: none"> Land may be a poorly contained area where changes could extend over a wide area and there may be limited potential to mitigate the adverse impacts of the changes. Strategic level of development likely to have significant adverse impacts on landscape character and/or significant adverse impacts on landscape features that are considered to be important to the setting of the town.
Moderate Capacity for Change Landscape capable of accepting some change without undue harm	Weak	Land of either unexceptional character with significant detracting elements, or area with stronger character that benefits from significant physical/visual containment. <ul style="list-style-type: none"> Land capable of accommodating significant change without undue harm to wider landscape character and/or landscape features that are considered to be important to the setting of the town. There may be potential for some enhancements to landscape character in weaker areas
High Capacity for Change Landscape capable of accommodating substantial change	No Contribution	Land with weakly defined character/degraded land . <ul style="list-style-type: none"> Land capable of accommodating substantial development without adverse impact on wider character and/or landscape features that are considered to be important to the setting of the town. There is likely to be substantial potential for landscape enhancement

05 Green Belt Assessment - Methodology

METHODOLOGY FOR IMPLEMENTING THE ASSESSMENT

- 5.33. **Stage 1.** All mapping and other relevant information will be brought together into a data set.
- 5.34. **Stage 2.** A desktop based assessment to appraise the land parcel will be carried out.
- 5.35. **Stage 3.** Based on the initial appraisal and site visit an assessment matrix will be prepared. An example of this is set out in **Table 12**.
- 5.36. Paragraph 143 of the NPPF does not state or infer that one purpose is more important than another. The three purposes assessed (A,B,C) and one purpose considered (D) should therefore be afforded equal weight in any final judgements.

FURTHER ASSESSMENT OF THE SITE AGAINST CONSIDERATIONS THAT ARE NOT GREEN BELT

- 5.37. There are other factors that are relevant to consider when assessing the potential development capacity for a parcel of land located in the Green Belt.
- 5.38. **Site Boundaries.** With regard to site boundaries, the NPPF states that when considering Green Belt boundaries, local planning authorities should define these using physical features which are readily recognisable and likely to be permanent. A robust boundary will make a stronger contribution to preventing urban sprawl compared to a weaker boundary.
- 5.39. Specific questions about the permanence of the site boundary are needed to determine its appropriateness. Such questions include:
- How strong is the site boundary and are there features nearby which would form a better boundary?
 - Is the site boundary logical?
 - Is there opportunity to improve the site boundary, for instance to incorporate an area of existing development?
- 5.40. **Positive use of the Green Belt.** There is also merit in considering the wider function of the Green Belt and any additional positive benefits the site plays as outlined in the NPPF. Aspects to be considered are:
- **Public Access** - how accessible is the Green Belt Site at present?
 - **Outdoor sport and recreation** - are there any existing facilities or proposals for such facilities?
 - **Landscapes, visual amenity and biodiversity** - is the site part of a sensitive landscape area? Are there any biodiversity designations or priority habitats?
 - **Damaged and derelict land** - is there any derelict land within the site? Are there any other ways that the land could be improved, other than through development?

OVERALL CONTRIBUTION OF THE SITE TO THE GREEN BELT

- 5.41. An overall commentary will be given as the conclusion to the Green Belt Assessment. This will allow conclusions to be drawn on the overall contribution of the site to the Green Belt, and conversely, the harm to the Green Belt that the site would cause if de-designated and potentially released for development.
- 5.42. As part of drawing conclusions on the site, potential alternative land uses, which may offer more permanent and robust boundaries to the Green Belt will be considered.
- 5.43. Following the assessment of the site contribution to Green Belt purposes, a consideration will be made regarding the Government guidance which sets out to identify grey belt land within Green Belt areas.

Table 7. Green Belt Assessment Summary Table Example

Site Description/ Name	NPPF Purposes of Green Belt				Notes	Overall Assessment
	Purpose A	Purpose B	Purpose C	Purpose D		
Land off Fosse Way, Stretton-on-Dunsmore	EXAMPLE	EXAMPLE	EXAMPLE	EXAMPLE	Summary Notes from assessment table for each Purpose	EXAMPLE

Previous Assessments

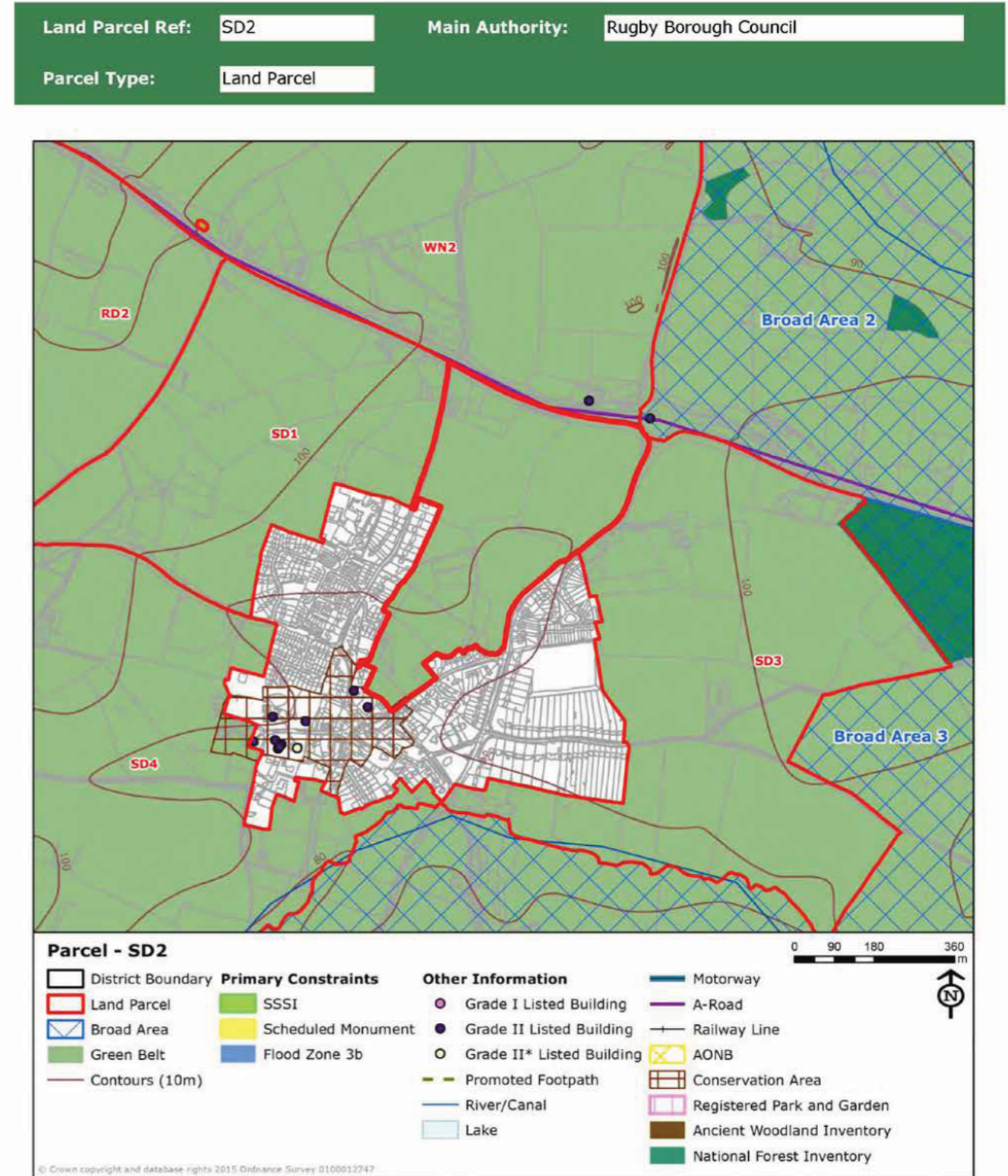
Joint Green Belt Study (June 2015)

- 6.1. The *Joint Green Belt Study by LDA* at stage 1 was commissioned jointly by Coventry City Council, Nuneaton & Bedworth Borough Council, Rugby Borough Council and Warwick District Council. The study provides the context and information to inform potential changes to the Green Belt as part of their Local Development Framework process.
- 6.2. Green Belt land adjacent to main settlements were been divided into parcels for assessment. The area relevant to the site is labelled **SD2** in the Green Belt Study, and includes the area of land that splits the village and extends to the A45 to the north.
- 6.3. The assessment criteria has been set out along with potential scores that can be assigned to each criterion and notes on how judgements were made. Scores were from 0-4 for all five purposes, with no.5 scoring 4 as all Green Belt land will assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- 6.4. The overall analysis concluded that Area SD2 performed moderately against the Green Belt Purposes (total score 12/20).
- 6.5. Area SD2 was given a **score of 3** out of 4 for its contribution to **Purpose 1**. The reasoning was that it 'helps prevent ribbon development along both School Lane and the B4455 (Fosse Way)'. The openness was reduced due to some agricultural development within the parcel.
- 6.6. Area SD2 was given a **score of 2** out of 4 for its contribution to **Purpose 2**. Its description is that 'the village of Wolston lies 2.1km to the north of Stretton'.
- 6.7. Area SD2 was given a **score of 3** out of 4 for its contribution to **Purpose 3**. This was split to the significance of existing urbanising influences (of which there were none), and boundaries/features that would prevent encroachment (the A45 dual carriageway to the northern boundary). With the applied weighting of 2 and 1 respectively, the total was three.

- 6.8. Area SD2 was given a **score of 0** out of 4 for its contribution to **Purpose 4**. The reasoning was that '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'.
- 6.9. Area SD2 was given a **score of 4** out of 4 (maximum) for its contribution to **Purpose 5**. consistent with every area for reasons given.
- 6.10. Therefore, a **combined score of 12** (out of 20) was given for Area SD2 performance against purposes 1, 2, 3, 4 and 5. It is considered that this is a mid-performing Green Belt parcel as
- 6.11. The Joint Green Belt Study summary report states that:

The majority of the parcels within the Stage 1 study area are 'mid-performing', meaning that they score moderately well across all the Green Belt purposes or have a mixture of high and low scores across the five purposes. There is no identifiable spatial pattern to these mid-performing parcels, as their weaker performance is attributable to a range of factors, including the presence of significant boundaries helping to protect the wider countryside from encroachment and reducing the need for the Green Belt to perform this purpose, and developments which compromise the openness of the Green Belt and urbanise the countryside. In some instances, the parcels form part of large gaps between towns, so that the risk of merging of neighbouring towns is more limited.
- 6.12. Stretton-on-Dunsmore was not defined in a 'broad area' in the LUC Study. **Figure 05** shows the location of Parcel SD2 in relation to the village. The site forms only a small proportion of the SD2 area and displays some different characteristics and attributes that distinguish it from the rest of the land assessed. Therefore it is likely that the conclusions drawn for the broader land parcel may not be directly applied to the site itself. A more detailed site specific assessment will help to identify how the site fares in the criteria for Green Belt.

Figure. 05. Joint Green Belt Study 2015 - map of Parcel SD2



GREEN BELT PURPOSE A

'To check the unrestricted sprawl of large built-up areas'

- 6.13. As outlined in the Methodology above, the definition of 'large built-up areas' in this assessment is applied to the land associated with Rugby to the east. The main rural villages including Stretton-on-Dunsmore are regarded in this assessment as smaller parcels. Refer to Figure O5 for the extract of the land parcel areas.
- 6.14. This is consistent with the Joint Green Belt Study of 2015, with Stretton-on-Dunsmore considered as a main rural villages and not a large built-up area. This assessment is therefore in line with previous reviews and assessments in its definition of the nature and perception of Stretton-on-Dunsmore
- 6.15. The site is located in a wedge of land that separates the east side of Stretton along Fosse Way with the west side on School Lane. The centre of the village is located where Church Hill, School Lane, and Brookside meet and the junction forms a village green. Here there are a number of shops, a public house and All Saints Church. The wedge of undeveloped land extends into the village up to Brookside, and is formed of paddocks and scrub land with a number of mature trees and strong hedgerow boundaries. This land opens into larger paddocks further to the north to the rear of properties that front Brookside, with the site to the eastern side of the wedge.
- 6.16. The current pattern of ribbon development along School Lane and Fosse Way has created this 'U' shaped settlement pattern with a wedge of open and undeveloped land leading to the village core. Therefore some modest sprawl has already occurred to the north towards the A45, and this has compromised the Green Belt and created an outward expansion of development. Whilst School Lane is developed to both sides of the road up to a natural field boundary in line with the northern boundary of the site, housing on Fosse Way has extended to the east only in a parcel of development around Meadow Close.
- 6.17. Therefore the land that includes the site within

this wedge sits spatially as part of the overall nucleated village pattern and confined by the natural field boundary that lies along the northern boundary of the site. As the parcel has already been compromised by ribbon development, some appropriately considered new development to the western side of Fosse Way could be considered, and would therefore have a limited impact on this purpose of the Green Belt.

- 6.18. The potential development of the site would therefore not comprise the presence of an open wedge of land within the settlement pattern or impact the character of the village core. The site would remain physically separated by the existing paddocks that occupy land to the east of properties on School Lane within the remaining Green Belt.
- 6.19. If the site were to be developed to its eastern half with the PROW as the limit, the wedge would be reduced but not obliterated, and be a consistent width to maintain separation between the two distinct areas with no physical connection between. Existing defensible boundaries to the north and west of the site can be maintained and strengthened through appropriate masterplanning and landscape design strategy to create a strong physical Green Belt boundary.
- 6.20. The Vision Document for the site prepared on behalf of Ashberry Strategic Land provided evidence on how the site could be developed in this way. Figure O6 and O7 in this assessment illustrate the masterplan where the PROW could form the outer boundary for development located to the west side of Fosse Way.
- 6.21. If the site were released from the Green Belt, an enduring long term settlement boundary could be established.
- 6.22. The Green Belt Study of parcel SD2 scored this purpose to check the unrestricted sprawl of large built-up areas as 2 (maximum) for helping to prevent ribbon development, and 1 for some development located within the parcel.

6.23. Summary and Assessment

- The proposed development site would not be an extension of a large built-up urban area.
- The proposed development site lies between the existing ribbon developments along School Lane and Fosse Way.
- The boundary to the existing urban edge on the site is a single hedgerow with trees.
- A long term and enduring settlement boundary could be established to the north and west.
- The site would remain physically separated by Green Belt land if developed to its eastern side.
- If Stretton-on-Dunsmore is considered in the context of large built up areas, the assessment of the contribution that the site makes to Purpose A of the Green Belt is **'Weak'**

GREEN BELT PURPOSE B

'To prevent neighbouring towns merging into one another'

- 6.24. As outlined in the Methodology above, the definition of 'town' in this assessment is not applied to Stretton-on-Dunsmore as it is regarded as a rural village, which is consistent with the Joint Green Belt Study 2015.
- 6.25. For completeness, this assessment has considered the contribution of the site towards Green Belt Purpose B in relation to the settlement of Stretton-on-Dunsmore, although it does not play a role in preventing towns merging.
- 6.26. The site lies in a wedge of land that separates two sides of the village that have resulted due to ribbon development to the east and west. The site is part of land that forms an undeveloped wedge within the village pattern and is located within the nucleus of the existing settlement. The eastern boundary abuts Fosse Way with a single hedgerow with some gaps in it, which allows views in and out of the site.
- 6.27. In terms of physical gaps between Stretton-on-Dunsmore and the nearest settlement of Wolston

is approx 2.1km to the north beyond the A45.

- 6.28. Due to the distance between the two settlements the site does not provide a primary role in preventing urban areas merging or blurring of boundaries between two settlements. It's only function is in providing some green space within the spatial setting of the village itself rather than a strategic function. The topography of the site assists in the perception of the site descending into the village and relating to the character of the settlement rather than the open countryside. The small valley provides containment with some visual connectivity to the adjacent housing which reduces the sense of openness, and influence of urban development.
- 6.29. The perception of a gap when viewing from the surrounding roads and footpaths would not be reduced by site development due to the role of the northern boundary of the site or its topography. Refer to the photographs in **Appendix 1** which illustrate the character and appearance of the village in views.
- 6.30. The Green Belt Study of parcel SD2 scored this purpose to prevent neighbouring towns merging into one another as 2 (out of 4) due to the large gap that exists between settlements.
- 6.31. **Summary and Assessment**
- The proposed site lies in a small valley between two parts of the settlement and abuts Fosse Way to the east.
 - Stretton-on-Dunsmore is not defined as a town, either in this assessment or in other previous Green Belt Reviews.
 - The site is not pivotal in providing a gap between settlements as the existing gap to Wolston is over 2km and would be maintained.
 - There will be a limited loss of openness if the site were to be developed.
 - When considered in the context of neighbouring towns, the assessment of the contribution that the site makes to Purpose B of the Green Belt is **'Weak'**.

GREEN BELT PURPOSE C

'To assist in safeguarding the countryside from encroachment'

- 6.32. As outlined in the Methodology above, the definition of 'countryside' in this assessment is applied to the site as *'open land with an absence of built development and urbanising influences and characterised by rural land uses including agriculture and forestry'*.
- 6.33. As outlined in the Methodology above, the definition of 'encroachment' in this assessment is applied to the site as *'a gradual advance beyond usual or acceptable limits'*. This is very similar to the Green Belt Study definition by LUC which defined encroachment as 'the intrusion / gradual advance of buildings and urbanised land beyond an acceptable or established limit'.
- 6.34. The character of the countryside can be determined by referring to the published assessment by the local authority and establishing the inherent characteristics of a particular area of land. The site is located in Plateau Fringe LCT in the Warwickshire Landscape Guidelines and is described as *'a rather variable, often large scale farmed landscape with a varied undulating topography and characterised by nucleated settlement pattern of small, often shrunken villages.'*
- 6.35. The Characteristics included:
- *An undulating topography of low rounded hills and narrow meandering river valleys.*
 - *Large, arable fields, often with a poorly defined field pattern.*
 - *Pockets of permanent pasture and smaller hedged fields, usually associated with more steeply sloping ground.*
 - *A nucleated settlement pattern typically comprising loose clusters of dwellings.*
 - *Isolated, brick built farmsteads.*
- 6.36. The assessment describes that for the most part the character is a large-scale, intensively farmed agricultural landscape, characterised by large arable fields, often with a poorly defined field pattern. *'In places, however, there are smaller*

scale pockets of permanent pasture and smaller hedged fields, usually associated with more steeply sloping ground'.

- 6.37. In the Joint Green Belt Study, the review is split into two issues: significance of existing urbanising influences; and significance of boundaries/features to contain development and prevent encroachment. The scores were 2 (maximum) and 1 respectively.
- 6.38. The nature of the undeveloped wedge of land gives the perception of the countryside extending into the village. However the site sits spatially within Stretton-on-Dunsmore and it is partially enclosed by a hard edge to the east along Fosse Way. It lies between two spurs of development at the northern end of the settlement along with a series of paddocks which separate the site from development along School Lane.
- 6.39. There is a clear and robust boundary to the north which would serve to contain potential development and minimise encroachment into the countryside. This is evident in the visual assessment provided in this report (**Appendix 1**) which can be seen in the previous chapter, where views from the approaches from the north are filtered by boundary vegetation and topography. Therefore the site parcel itself does not make a significant contribution to maintaining the openness in views, and therefore it is likely to have a moderate to low susceptibility for change.
- 6.40. To the western edge of the site is a similarly strong field boundary which screens views from School Lane and separates the site from the adjacent paddocks. This would also play a role in provide a buffer to encroachment of the countryside and is located relatively close to the existing urban edge of the settlement. The Public Right of Way through the centre of the site forms a secondary boundary that would act as a limit to development and allow for a landscaped buffer to its western side to border the remaining Green Belt. The eastern boundary consists of a single hedge with some trees that form a mature but visually permeable boundary in winter.
- 6.41. The use of the site is grassland and scrub and so

by definition the land is currently open.

- 6.42. The residential area that is adjacent to the eastern edge of the site is post-war estate development on previous agricultural land. This adds a segment of urban development that protrudes out from the village centre but is restricted to a natural field boundary to the east which reflects other development extent in this part of the village. The same would be true of the northern boundary of the site as this is consistent with the extent of the ribbon development along School Lane to the west. This therefore would form a defensible boundary and prevent further encroachment into the countryside as required by purpose C of the Green Belt.
- 6.43. Therefore, the assessment combines these factors to conclude that the site parcel makes a limited contribution to the perception of the open countryside as described in the Warwickshire Landscape Guidelines. These Guidelines for 'Plateau Fringe' LCT provides a management strategy for the area that seeks to *'enhance the overall structure and key features within the farmed landscape'*.
- 6.44. The site has a rural character, but is not of exceptional quality and so this results in an assessment of moderate to weak for the contribution of the site to landscape character and sensitivity, to inform Purpose C.
- 6.45. The Warwickshire Landscape Guidelines for 'Plateau Fringe' LCT provides a management strategy for the area that seeks to *'enhance the overall structure and key features within the farmed landscape'*.
- 6.46. **Summary and Assessment**
- The Landscape Character description is *'smaller scale pockets of permanent pasture and smaller hedged fields'*.
 - The site has a perception of open countryside extending into the village pattern as part of the wedge of undeveloped land.
 - Views are predominantly screened from the south, east and west due to topography, existing

urban area, and mature hedgerows. Direct views are available from the north towards the northern boundary.

- The site parcel itself does not have a significant impact on maintaining the openness in views and therefore the site is likely to have a moderate to low susceptibility for change.
- The northern and western boundaries provide a strong and defensible landscape boundary to inhibit encroachment into the wider Green Belt.
- Appropriate development to be implemented would not significantly detract from the perception of the countryside in this Character Area and wouldn't be beyond an acceptable limit.
- The assessment of the contribution that the site makes to Purpose C of the Green Belt is therefore **'Moderate to Weak'**.

GREEN BELT PURPOSE D

'To preserve the setting and special character of historic towns'

- 6.47. **Purpose D.** There are no designated historic towns in the vicinity of the site that may be affected by its development. It is therefore considered that the site being assessed in this report makes no contribution to the NPPF Green Belt Purpose D.
- 6.48. This is consistent with the findings in the Joint Green Belt Study which states that *'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'*.
- 6.49. No assessment of **Purpose E** has been provided for reasons set out in the Green Belt assessment methodology previously.

06 Green Belt Assessment

Table 8. Green Belt Assessment Summary Table

Site Description/ Name	NPPF Purposes of Green Belt				Notes	Overall Assessment
	Purpose A	Purpose B	Purpose C	Purpose D		
Land off Fosse Way, Stretton-on-Dunsmore	Weak	Weak	Moderate to Weak	No Contribution	<p>a. The proposed development site would not be an extension of a large built-up urban area.</p> <p>b. The proposed development site lies between the existing ribbon developments along School Lane and Fosse Way.</p> <p>c. The boundary to the existing urban edge on the site is a single hedgerow with trees.</p> <p>d. A long term and enduring settlement boundary could be established to the north and west.</p> <p>e. The site would remain physically separated by Green Belt land if developed to its eastern side.</p> <p>f. The proposed site lies in a small valley between two parts of the settlement and abuts Fosse Way to the east.</p> <p>g. Stretton-on-Dunsmore is not defined as a town, either in this assessment or in other previous Green Belt Reviews.</p> <p>h. The site is not pivotal in providing a gap between settlements as the existing gap to Wolston is over 2km and would be maintained.</p> <p>i. There will be a limited loss of openness if the site were to be developed.</p> <p>j. The Landscape Character description is 'smaller scale pockets of permanent pasture and smaller hedged fields'.</p> <p>k. The site has a perception of open countryside protruding into the village pattern as part of the wedge of undeveloped land.</p> <p>l. Views are predominantly screened from the south, east and west due to topography, existing urban area, and mature hedgerows. Direct views are available from the north towards the northern boundary.</p> <p>m. The site parcel itself does not have a significant impact on maintaining the openness in views and therefore the site is likely to have a moderate to low susceptibility for change</p> <p>n. The northern and western boundaries provide a strong and defensible landscape boundary to inhibit further encroachment into the wider Green Belt.</p> <p>o. Appropriate development to be implemented would not significantly detract from the perception of the countryside in this Character Area and wouldn't be beyond an acceptable limit.</p> <p>p. The site is not located within the setting of any historic towns and does not overlap with a Conservation Area</p>	Moderate to Weak

07 Assessment Summary

Further assessment of the site against considerations that are not Green Belt

- 7.1. The strength of the site boundary has been considered within the assessment of the Green Belt Purposes and therefore has been assessed in terms of the contribution that a strong, robust and defensible boundary could make to the Green Belt in this area
- 7.2. The analytical survey of the site and its immediate setting is illustrated on **Figure 06**. In terms of amenity value, there is a single public right of way (PRoW) that leads from Brookside north through the site and connects with the A45. A second footpath leading from School Lane to the west and converging at the southern end of the site.
- 7.3. There are currently no facilities for outdoor sport and recreation which contributes to the value of the land for Green Belt purposes. New public open space created with further accessible routes would be a significant local benefit for the residents of Stretton-on-Dunsmore, as well as creating a more strategic link for the village.
- 7.4. Subject to the findings of any future ecological appraisals, the assessment has not currently found evidence, either through desktop research or site visits, of any significant ecological or biodiversity value. The site is low quality agrarian land that is left fallow with areas of tussock grass, and shrubs have developed along the route of the brook. There are some mature trees within the hedgerow alongside the Fosse Way, which are important features along the street scene.
- 7.5. Due to the existing unmanaged nature of the majority of the site, there is potential for biodiversity enhancements and net gain proposals that would create a rich and diverse habitat mosaic as well as creating connectivity for wider nature recovery networks.

Overall contribution of the site to the Green Belt

- 7.6. This assessment concludes that the main rural village of Stretton-on-Dunsmore is distinct in location, form and character from the large built up areas. The Green Belt land currently surrounds

the village and therefore protects against unrestricted sprawl from Stretton-on-Dunsmore towards other main rural villages and the built-up area of Rugby to the east and Coventry to the west. The development of the site would neither diminish this protection nor endanger it (by creating a stepping stone for further future urban expansion).

- 7.7. The proposed site could provide a new, permanent and robust landscape boundary that would restrict future development on the north edge of Stretton-on-Dunsmore. The role of the Green Belt in this location appears to fulfil the preventing encroachment into the countryside rather than to keep the west and east parts of the village from merging. In any event, the residual gap between the two parts of the village could be maintained through an appropriate development in the eastern part of the site up to the PRoW. This would maintain a gap of at least 180m and provide an enhanced landscape scheme to complement the proposed development.

7.8. **Figure 07** illustrates the indicative masterplan that was produced to support the land promotion for development within the site, providing access form Fosse Way. Whilst this would increase the ribbon development into existing Green Belt land, the encroachment would be limited and utilise an existing and defensible boundary: the northern field boundary hedgerow and trees.

- 7.9. The proposed site would be perceived as, and would physically be, an appropriate localised village extension within defined existing and proposed long term boundaries.

- 7.10. For robustness of process and testing against the principles of Green Belt definition, within a wider context of Rugby, to apply the principle to 'smaller settlements' would conclude the following:

- The site is not pivotal in maintaining the gap between settlements as a majority of the significant existing gap would be maintained
- The visual perception of openness and separation between settlements (the nearest being 2.1km) would be very marginally reduced at a limited number of receptors if development were to occur on the site.
- The northern boundary provides a strong and

defensible landscape boundary to inhibit further encroachment into the wider Green Belt.

- 7.11. The site lies within Plateau Fringe LCT, described as '*undulating topography of low rounded hills and narrow meandering river valleys*'. The character area guidelines define the area to manage and '*enhance the overall structure and key features within the farmed landscape*'.

- 7.12. There is potential to provide high quality public open space and access to the countryside on this site. Therefore, the opportunity exists to significantly improve the enjoyment of, and perception of, the countryside in this localised character area.

- 7.13. The site does not contribute to the NPPF Green Belt Purpose D as there are no historic towns that are in the vicinity of the site.

- 7.14. Overall, the site makes a limited contribution to the 5 Purposes of the Green Belt as set out in the National Planning Policy Framework.

- 7.15. If development were to occur on the site, the benefits to public and nature would likely outweigh any impact caused to the Green Belt Purposes in this local village setting.

Identification of grey belt land and appropriate development

- 7.16. As described in updated Government guidance (February 27, 2025), '*grey belt land excludes land where the application of policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development.*' The areas or assets listed in footnote 7 are as follows:

- Sites of Special Scientific Interest
- Green Belt
- Local Green Space
- A National Landscape
- A National Park
- A Heritage Coast
- Irreplaceable habitats

- Designated heritage assets
- Areas at risk of flooding or coastal change

- 7.17. As Green Belt is exempt in this consideration, the development of the site being assessed in this report would not affect any other areas on list of Designations in footnote 7. Refer to **Figure 02** Policy Context and Designations.

- 7.18. Government guidance goes on to state that '*After consideration of the above criteria, any assessment area that is not judged to strongly contribute to any one of purposes a, b, or d can be identified as grey belt land*'.

- 7.19. Following the assessment in this report of the contribution the site makes to Purpose A as 'Weak', Purpose B as 'Weak' and Purpose D as 'None', there is sufficient reasoning to conclude that the site can be identified as grey belt.

- 7.20. In line with Government guidance, wider considerations will still be relevant to the consideration of development proposals on the site. These would include determining whether the development would not be inappropriate development in the Green Belt as set out in paragraph 155 of the NPPF.

- 7.21. With relevance to the subject of this assessment, development of the site accords with paragraph 155a of the NPPF in that it would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

- 7.22. With regard to the necessity of the development proposals to meet the 'Golden Rules' set out in paragraphs 156 and 157 of the NPPF (refer to paragraph 3.12, page 12 above), the conclusion of this assessment is that, whilst no detailed site plans or designs are currently available, there appears no reason why the rules relevant to siting and design cannot be met by considered and high quality design proposals.

Figure. 06. Landscape Analysis of the Site



Figure. 07. Indicative Masterplan





08 Conclusions

- 8.1. IDP Landscape Ltd are appointed by Ashberry Strategic Land to provide a Landscape Appraisal and Green Belt Assessment for the promotion of a potential residential development and associated landscape at Land off Fosse Way, Stretton-on-Dunsmore.
- 8.2. A Green Belt Assessment has been carried out for the site to understand the contribution it makes towards the five purposes of the Green Belt, as set out in the National Planning Policy Framework. The assessment considered Purpose A 'to check the unrestricted sprawl of large built-up areas' and that the site parcel makes a **weak** contribution to this purpose. For Purpose B 'to prevent neighbouring towns merging into one another' the assessment has concluded that the site makes a **weak** contribution to this purpose. For Purpose C 'to assist in safeguarding the countryside from encroachment' the assessment has concluded that the site makes a **moderate to weak** contribution to this purpose. The site makes **no contribution** to Purpose D as the site is not located within the setting of any historic towns and does not overlap with a Conservation Area.
- 8.3. The site accords with paragraph 155a of the NPPF in that it would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.
- 8.4. The site is located in Warwickshire Landscape Character Type 'Plateau Fringe'. The key characteristics included:
- *An undulating topography of low rounded hills and narrow meandering river valleys.*
 - *Large, arable fields, often with a poorly defined field pattern.*
 - *Pockets of permanent pasture and smaller hedged fields, usually associated with more steeply sloping ground.*
 - *A nucleated settlement pattern typically comprising loose clusters of dwellings.*
 - *Isolated, brick built farmsteads.*
- 8.5. The potential development of the site is unlikely to affect the key characteristics of the wider LCT as outline in the Warwickshire Guidelines. The sensitivity of the site within its location is

not inhibitive to appropriate development, and retention of existing landscape features that contribute to the character of the site. There is opportunity on the site for significant biodiversity enhancements and connectivity between surrounding Green Infrastructure to contribute to wider Nature Recovery Networks.

- 8.6. From a visual aspect, there is a clear and robust boundary to the north which would serve to contain potential development and prevent encroachment in the long term. This is evident in the visual assessment provided in this report which can be seen in the previous chapter, where views from the approaches from the north are filtered by boundary vegetation and topography. Therefore the site parcel itself does not have a significant impact on maintaining the openness in views and therefore the site is likely to have a moderate to low susceptibility for change.
- 8.7. In conclusion, the essential characteristics of the Green Belt have been considered and the potential development of the site would maintain an open green wedge that separates the east and west of the village, despite some loss of openness on the site which is inevitable with development of green field sites. The development would not encroach further north than the adjacent development on Fosse Way, and would allow reinforcement of an existing field boundary with further planting to ensure that the visual impact is kept to a minimum.
- 8.8. The assessment considered Purposes A-D, concluding that overall, the site parcel is **moderate to weak** in its contribution to the Green Belt purposes. Also, the site accords with paragraph 155a of the NPPF in that it would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.
- 8.9. The updated Green Belt guidance by the UK Government, dated February 27 2025, outlines the considerations that need to be determined when assessing whether land is grey belt. The site is assessed within this report as **meeting these requirements** i.e. it does not strongly contribute to the Green Belt Purposes A, B or D **and** the application of the policies in footnote 7 of the NPPF (other than Green Belt) do not provide a strong reason for refusing development.





PEOPLE FOCUSED PLACES

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Ashberry



LAND WEST OF FOSSE WAY, STRETTON-ON-DUNSMORE

Development Vision Document

March 2026



ARCHITECTURE
URBAN DESIGN &
MASTERPLANNING
LANDSCAPE &
ENVIRONMENT

placemaking for life.

This document has been prepared by IDP working in conjunction with Ashberry Strategic Land to illustrate the potential for new residential development at Land west of Fosse Way, Stretton-On-Dunsmore.



The following consultant team have supported Ashberry in the development of the proposals:

<i>Landscape & Urban Design:</i>	<i>IDP</i>
<i>Ecology:</i>	<i>FPCR</i>
<i>Highways:</i>	<i>Savoy Consulting</i>
<i>Engineering: Drainage</i>	<i>Fairhurst</i>

<i>Revision</i>	<i>A</i>
<i>Date</i>	<i>10.03.26</i>
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<i>Checked by</i>	<i>CBM</i>
<i>Purpose</i>	<i>PLANNING</i>



CONTENTS

1	<i>INTRODUCTION</i>	5	3	<i>VISIONING PRINCIPLES</i>	22
2	<i>APPRECIATING THE CONTEXT</i>	6		Landscape Opportunities & Constraints	23
	Introduction	7		A Vision: A Connected Place	24
	Local Context	8		Development Framework	26
	Locally Important Buildings and Locations	9	4	<i>ILLUSTRATIVE MASTERPLAN</i>	27
	Planning Policy Context	10	5	<i>CONCLUSIONS</i>	28
	Landscape Context	12			
	Visual Analysis	14			
	Access & Highways	18			
	Drainage & Flooding	19			
	Ecology	20			





1. Introduction



This document has been prepared on behalf of Ashberry Strategic Land in response to Rugby Borough Council's Local Plan Review. The Council is carrying out a 'Call for Sites' for further potential housing sites within the Borough to meet the proposed housing requirement, and the purpose of this visioning document is to promote the site for development in the Local Plan.

The site covers an area of 3.5 hectares to the west of B4455 Fosse Way in Stretton-on-Dunsmore. It is bound by residential development to the east to the other side of Fosse Way, and properties off Brookside to the south. The site is enclosed by existing hedgerows and trees around the periphery, with some mature Oak trees to the roadside. The Fosse Way is the main route into the village from the A45, with the main core to the southwest set around a traditional village green.



-  Site Boundary
-  Settlement Extent

2. Appreciating the Context

This Vision Document has been prepared on behalf of Rosconn Strategic Land to illustrate the opportunities for potential residential development at Land at Stretton-On-Dunsmore.

War memorial on A45 to the north of Stretton



Introduction

The document specifically assesses the site and its context in respect of how residential development could be accommodated in terms of the following matters:

- *The context of the site, its location and proximity to local services, its planning context in terms of relevant adopted / draft designations and allocations and the historic form of the settlement;*
- *The local landscape character and visibility of the site and it's context;*
- *The analysis of the site including its use, edges and features;*
- *The design principles that should be applied to the site to inform an appropriate form of development, including the extent and likely maximum number of dwellings the site can acceptably accommodate;*
- *The likely effects of development on the site, including the purposes of including land in the Green Belt and effects on the landscape and visual resource, and;*
- *The conclusions in respect of the site's ability to deliver residential development.*



2. Appreciating the Context

Local context

The site is accessed from Fosse Way, and located approximately 500m from the historic centre of Stretton-On-Dunsmore.

The village is focused around the convergence of a number of lanes, and the historic core of the church and manor house on Church Hill within a Conservation Area. According to the Village Design Statement 2012 the main growth of the village took place in the 1940's and 50's, particularly focused to the northwest alongside a primary school, and to the east along Rugby Lane and Fosse Way.

The village generally retains its nucleated settlement pattern and sense of character, but is likely to be the focus for further development given its status as a main rural settlement.

Services in the village include the primary school, doctor's surgery, general store and Post Office, public house, village hall, and local bus services to adjacent towns.

All Saints Church is the focal point of Stretton, located at the southern end of the village within the Conservation Area, and is Grade II listed. It lies within a cluster of listed buildings of Church Farm, Manor House, Stretton House, and the church which are buildings of great interest and grandeur.*

The site lies immediately adjacent to the settlement boundary, within land designated as Green Belt. The fundamental aim of Green Belt policy, as set out in the NPPF, is to prevent urban sprawl by keeping land permanently open.



Locally important buildings and locations



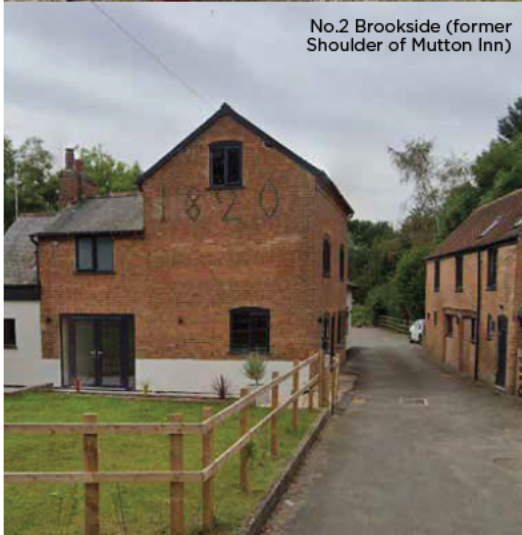
War memorial



Village Post Office



Parish Church of All Saints



No.2 Brookside (former Shoulder of Mutton Inn)



Village Green



The Oak and Black Dog Public House

2. Appreciating the Context

Introduction

This section of the document sets out a summary of the key qualitative and quantitative surveys and reporting that has been carried out by the project team to develop a full and clear understanding of the site conditions and its context. This study has fundamentally underpinned the proposals set-out in our overall vision, ensuring a sound baseline underpins the proposals.

Planning Policy Context

Rugby Borough are conducting a Local Plan Review and have launched a Call for Sites s required at the end of a 5 year period following the adoption of Local Plan 2019. Once adopted, estimated to be by December 2026, the Revised Local Plan will set out the planning policies and local growth strategy including for new homes, jobs and infrastructure.

The RBC Local Plan Issues & Options Document (Oct 2023) is reviewing existing policies and considering new policies covering:

- *Land for employment uses*
- *Town centre regeneration*
- *Pitches for gypsies & travellers*
- *Houses in multiple occupation*
- *Climate change policies*
- *Design coding & guidance*
- *Land for Housebuilding*

Alongside the consultation RBC are asking landowners and developers to put forward land for consideration for allocation in the new local plan which this document aimed at.

After the consultation closes, RBC will produce a housing and economic land availability assessment ('HELAA'). This is the first stage of assessing sites for allocation in the new plan.

Adopted Local Plan

The current Adopted Local Plan has several policies relevant to the Site and suitability to development.

Policy NE2: Strategic Green and Blue Infrastructure - *Where appropriate new developments must provide suitable Green and Blue Infrastructure corridors throughout the development and link into adjacent strategic and local Green and Blue Infrastructure networks or assets where present.*

Policy NE3: Landscape Protection and Enhancement - *New development which positively contributes to landscape character will be permitted.*

Policy SDC5: Flood Risk Management - *The locating of suitable development will be undertaken by the Council based on the Environment Agency's flood zones as shown on the latest Flood Map. This will steer new development to areas with the lowest probability of flooding.*

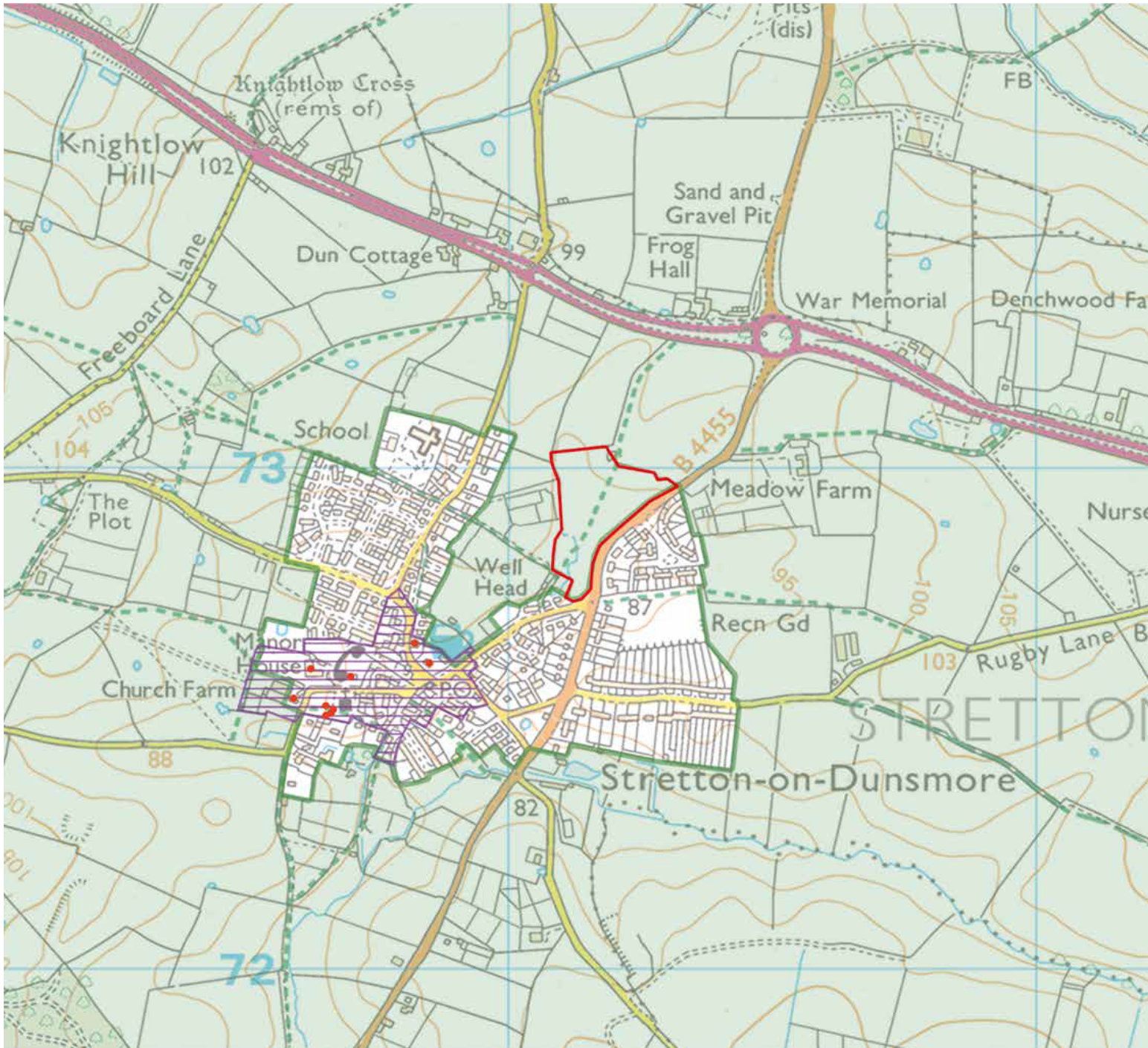
Policy SDC6: Sustainable Drainage - *Sustainable Drainage Systems (SuDS) are required in all major developments and all development in flood zones 2 and 3.*

Policy GP2: Settlement Hierarchy - *Green Belt: New development will be resisted; only where national policy on Green Belt allows will development be permitted.*

The site lies immediately adjacent to the settlement boundary, within land designated as Green Belt. The fundamental aim of Green Belt policy, as set out in the NPPF, is to prevent urban sprawl by keeping land permanently open.

Green Belt serves the following five purposes:

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



- KEY
-  Site location boundary
 -  Green Belt
 -  Conservation Area
 -  Listed Buildings

2. Appreciating the Context

Landscape Context

The landscape has a rolling topography of interlocking plateaus and small valleys containing springs and tributaries. Stretton-On-Dunsmore lies within a hollow surrounded by upland landscape.

The village is therefore relatively well contained by topography.

There are a number of hydrological features within the area including a high proportion of ponds, and Stretton brook that emerges near the site at Well Head and flows south through the village, culverted in a number of places to meet a larger watercourse to the south.

The village lies within the Regional Character Area of 'Dunsmore' in the Warwickshire Landscape Guidelines 1993, with the site located on the boundary of landscape types 'Plateau Farmlands' and 'Plateau Fringe'.

The Landscape Assessment of the Borough of Rugby 2006 is intended to support the development planning process, by examining the character of the landscape in the borough, its sensitivity as the combination of the fragility of inherent character and visual sensitivity, and the condition of the countryside. The area around the site is indicated as high fragility; moderate visibility, and therefore high sensitivity.

The concept of fragility incorporates both the natural (ecological) and cultural dimensions of the landscape. Visual sensitivity is a measure of the degree to which change is likely to cause a visual impact within a particular landscape. This is obviously a borough wide assessment and there will be local variation in natural, cultural and visual sensitivity for specific sites.


The characteristics of the Dunsmore Plateau Fringe are the undulating topography of hills and meandering valleys with large arable fields, often with a poorly defined field pattern. Pockets of permanent pasture and smaller hedged fields are characteristics that relate well to the site, shaped by the way the village has evolved. The current situation is paddocks and rough grassland, with a composition of hedgerows, tree groups and scruffy vegetation, with occasional shelter belt planting.

There is a mature hedgerow along the western side of Fosse Way, which separates the road from the site, although there are some gaps that provide glimpsed views in. There is a discernible edge to this area along the north of the site where the land use changes to large scale arable fields and the topography ascends to the A45.

The Incomparable 29th Division

Between December 1914 and March 1915, many of the soldiers who would make up the 29th Division were billeted in Warwickshire and North Oxfordshire. They stayed in towns and villages including Coventry, Rugby and Kenilworth.

The members of the Division came largely from the north (England, Ireland, Scotland and south Wales). Only a few came from the Midlands. The billeting was very successful. It was popular amongst the local communities and even led to marriages between soldiers and local women.



King George V in England, 1914. © Our Heritage Centre


The Division landed at Cape Helles in Gallipoli in April 1915 under heavy fire from the Turkish Army. They fought throughout the campaign until the evacuations of Suvla in December 1915. Their brave efforts earned them the name 'The Incomparable 29th'.

They next served in France and Belgium from 1918 to 1919, from the first day of fighting in the Battle of the Somme to the Fifth Battle of Ypres.

After the war, money was raised by public subscription following a local wish to commemorate King George V's review of the troops and their brave action with the 29th Division. The memorial was erected in 1920 and is 12.5m tall. It was unveiled in May 1921, before a crowd estimated to be over 7,000. At that point, the monument was flanked by two captured German guns. An avenue of elms, planted in the early 18th century, ran for six miles over Dunsmore Heath on either side of the London road (now the A45). Many of these were blown down during severe gales in 1914.

In the interests of safety, the Duke of Buckingham wanted to fell the remainder of the trees, so in 1917 Warwickshire County Council formed the 'Dunsmore Avenue Committee'. The verges and trees were transferred to the County Council who undertook to replant the avenue using some of the money raised to build the memorial (thus also creating a 'living memorial'). During the autumn and winter of 1929/31 464 lime, elm and beech trees were planted over a distance of two miles.

In 1953, dying elms were replaced with more lime trees. More trees were felled when the second carriageway was added in the late 1950s so further replanting took place. The Dunsmore Avenue Committee met for the last time in 1973, when 72 new limes were planted on the east side of the Memorial. More trees were felled when the roundabout was built in 1986 so in 1993 two lime trees 5.5 metres in height were planted to enhance the setting of the Memorial.




As part of the Dunsmore Living Landscape Scheme, in 2022 three new lime trees were planted between the roundabout and the petrol station. Those were dedicated to Officers from the Division who were awarded the Victoria Cross.

Kilthia
By Jessica Scuffie and Sophie Gambing














Kilthia, a silent place,
Will we junkie the dark and hair?
The hot, too cold, can never decide,
Our boredom, all feelings are lacked to the side.
We'll, No Man's Land, fishing net,
Wee, weel, north and south all we have left,
Kilthia,
Will you let us live?

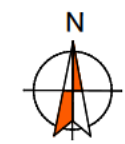
To see more poems written by pupils at Kingstree C. of E. Primary School, visit exploredunsmore.org/projects/pupils-poetry-for-the-29th-division



War Memorial Interpretation Board



- KEY**
-  Public Footpath
 -  Views Towards the Site
 -  Village Approach View
 -  No views available due to screening
 -  Heavy Screen Planting
 -  Major Road Corridor (A45)
 -  Topographical Contours
 -  Waterbodies / Streams
 -  Landscape Structure
 -  Listed Buildings
 -  Listed War Memorial
 -  Development Area
 -  Conservation Area



2. Appreciating the Context

Visual Analysis

The visual envelope is restricted by topography and intervening vegetation to the local network of roads to the east and west of the site, and as far north as the A45 which forms a strong linear barrier.

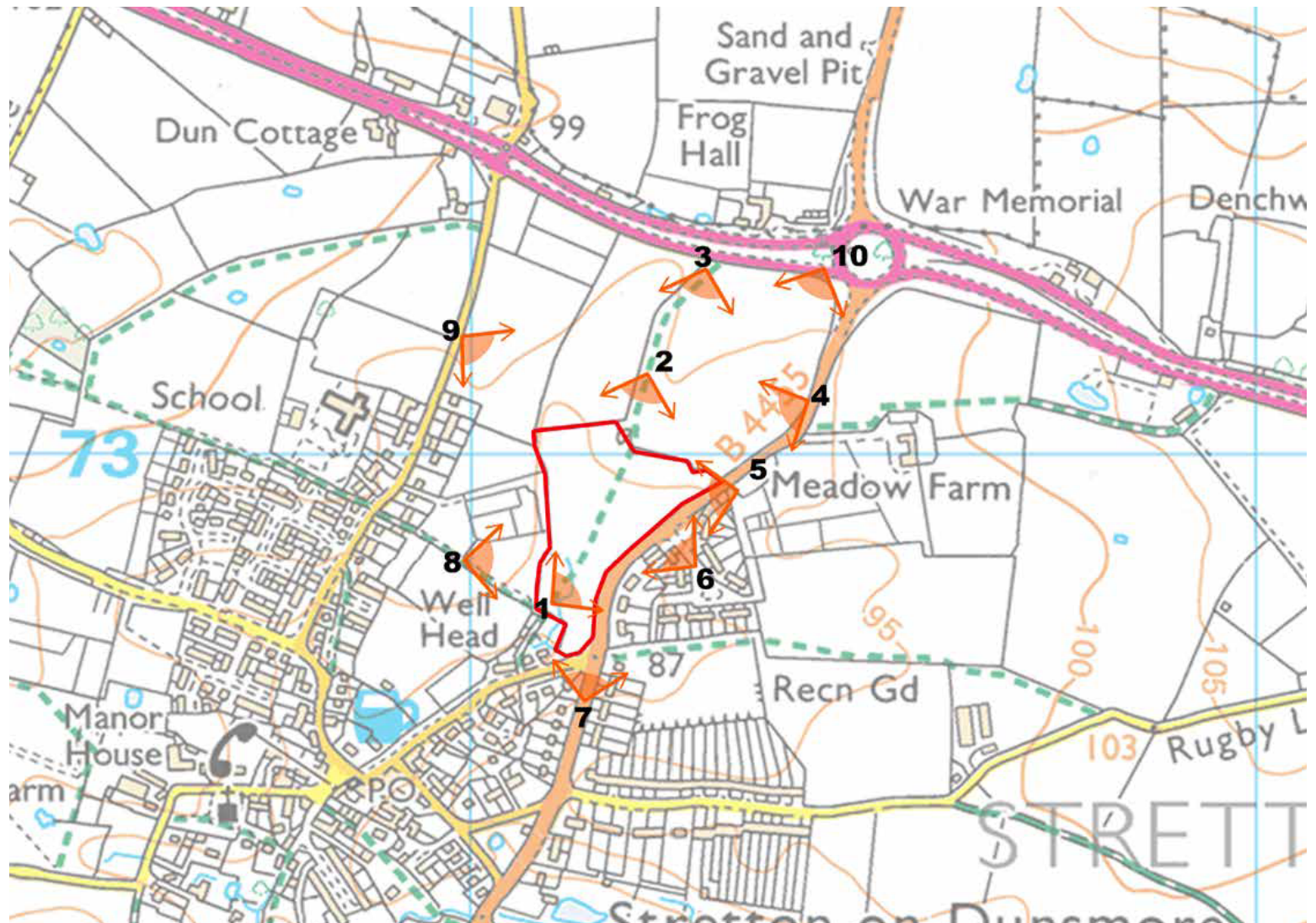
A key approach is along the Fosse Way towards the village depicted by Viewpoint 4, with All Saints Church a local landmark set within the treescape.

The approach into the village has a sudden transition at the northeast corner of the site where the existing dwellings front onto Fosse Way to the east. There is an open view into the site at this point (Viewpoint 5), then with the mature hedgerow and trees provide some screening along the eastern boundary (Viewpoint 6 and 7).

The two public rights of way provide views across the site with the peripheral housing often glimpsed amongst the vegetation, and with views out to the north.



View along the A45 close to Stretton on Dunsmore exit



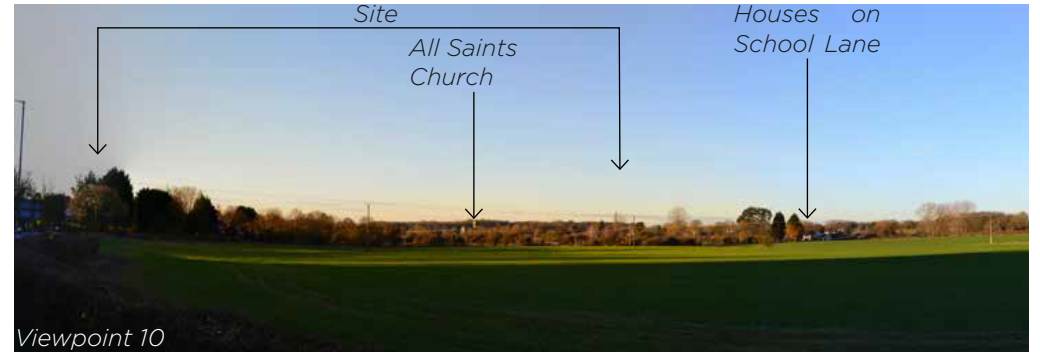
- Site Boundary
- Viewpoint Location

Viewpoint Location Plan

2. Appreciating the Context

Visual Analysis





2. Appreciating the Context

Access & Highways

Savoy Consulting, a specialist transportation planning consultancy, has been instructed to carry out an initial site feasibility assessment for a site in Stretton on Dunsmore, Warwickshire.

Highways Access

Existing Conditions

The site in question is located on the western side of the B4455 Fosse Way. This section of Fosse Way is subject to a 30 mph speed limit, and benefits from a system of street lighting. North of Meadow Close is a chicane which controls the speed of traffic entering the village.

As part of the feasibility study an automatic traffic counter has recently been installed to record the speed and volume of traffic on Fosse Way in the immediate vicinity of the site in question. The results of the survey show that traffic flows on Fosse Way are modest for this classification of road and the 85th percentile speed of traffic is in the order of 33 mph.

Site Access

To access the site it will be necessary to provide a junction that provides adequate visibility splays and accords with relevant highway design standards. To demonstrate that it is possible to meet highway design standards an indicative site access plan has been prepared and is shown opposite.

From examining this drawing it can be

readily seen that a junction could easily be provided that could provide access to at least 50 dwellings. As part of providing the new site access two parking spaces in a lay-by on the western side of Fosse Way will be lost. As part of the construction of the new access three replacement spaces will be provided on the new access road within the site.

It is important to note that the vast majority of the traffic generated by this site would be using the local classified highway network to gain access to the strategic network, A45 and A423. This means that little if any traffic arising from the development would be passing through the village centre, unless that was its primary destination.

Sustainability

A preliminary examination of local amenities has been carried out and it can be readily seen that easy access from this site is possible for example, to the local primary school, post office, doctor's surgery, convenience store and bus stops.

Conclusions

From the preliminary work that has been carried out by Savoy Consulting it can be seen that it is possible to provide access to the site in question that meets with all relevant highway design standards. Any traffic generated by the development will use the classified highway network rather than the local village roads. It can also be seen that the site is in a sustainable

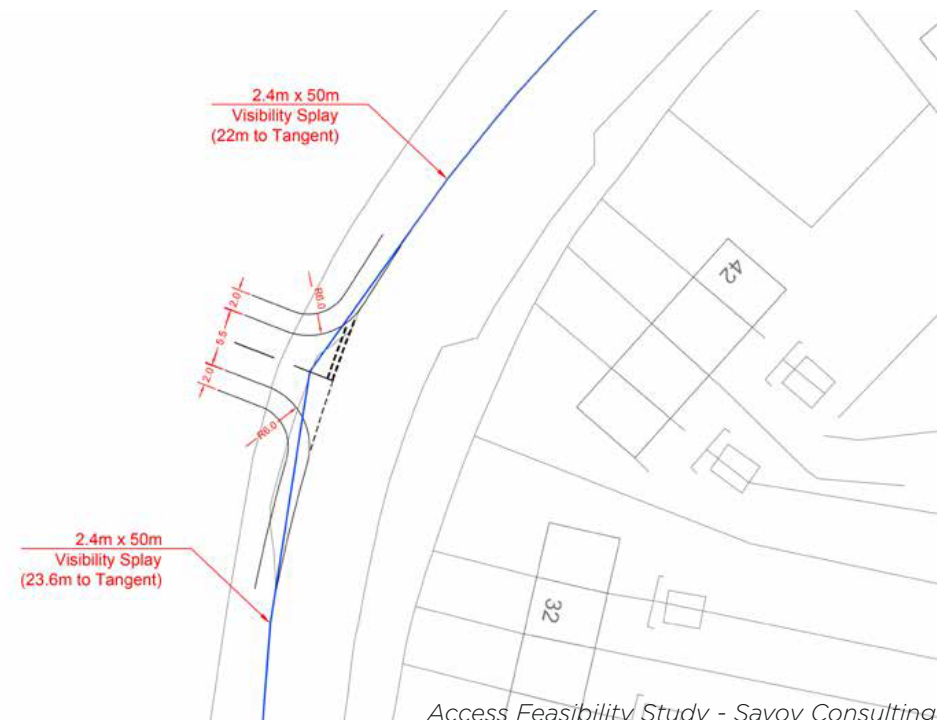
location in Stretton on Dunsmore.

Non-Car Access

An existing right of way runs between Brookside to the south and London Road (A45) to the north and School Lane to the west. These paths link to a wider network of public rights of way surrounding the village. The nearest bus stops are located on Brookside (275m, south) and School Lane (245m, west)

Opportunities

There are opportunities for a number of measures to enhance the site's sustainability and to benefit the wider community, such as new and improved local pedestrian and cycle infrastructure, improved bus facilities/services, on-site community parking, and a residential travel plan.



Access Feasibility Study - Savoy Consulting

weareidp.co

Drainage & Flooding

Fairhurst have produced a Preliminary Flood Risk & Drainage Assessment to provide an overview of flood risk and drainage status in relation to the potential development of the site.

Environment Agency mapping data shows that the entirety of the site lies in Flood Zone 1 which has an annual probability of fluvial flooding of less than 1 in 1000 year.

Surface Water Flooding Mapping Data shows that the site has two small strips within the Southern section which are affected by surface water flooding. This area coincides with a small watercourse running from the southern part of the site through the adjoining housing.

Geological information from the British Geological Society indicates that the site is underlain by a bedrock deposit of Mercia Mudstone (clay) with Bosworth Clay and some Alluvial Fan Deposits, apart from the Alluvial Fan these soils can be classed as impermeable.

Evidence from the site visit indicates that the site has poor drainage in the east and west due to a clogged ditch, a previously installed pipe and land drainage is conveying flows across the site and greatly improved the sites drainage.

The proposed flows from developable areas of the site are to be restricted to greenfield run off rates and attenuated in a pond or storage structure prior to discharge to the existing watercourse ensuring that there is not any increase in flood risk downstream.



2. Appreciating the Context

Ecology

The site comprises two grassland field compartments which support other neutral grassland, divided by a brook and largely bound by outgrown native hedgerows, treelines and scrub. As the site slopes to the south the field grades to a damper grassland community and is dominated by rushes within the southern half. There is also a small area of wet grassland dominated by floating sweet-grass around a drainage pipe along the eastern boundary.

The site is not covered by any statutory ecological designations and no direct impacts to local statutory and non-statutory designations are anticipated. The nearest statutory designation comprises Wolston Gravel Pits SSSI, located approximately 1.63km to the north which comprises a geological designation. The proposed development will provide opportunities to create new habitats that will buffer and enhance the value of retained habitats by improving the overall habitat connectivity across the site.

A single pond was located on-site, with a further nine identified within the local area and mostly isolated from the site. If GCN were confirmed to be present the proposed green infrastructure will ensure that suitable terrestrial habitats can be provided to compensate for any minor losses of existing suitable habitats with works undertaken in accordance with a Natural England licence to ensure no impact on this species.

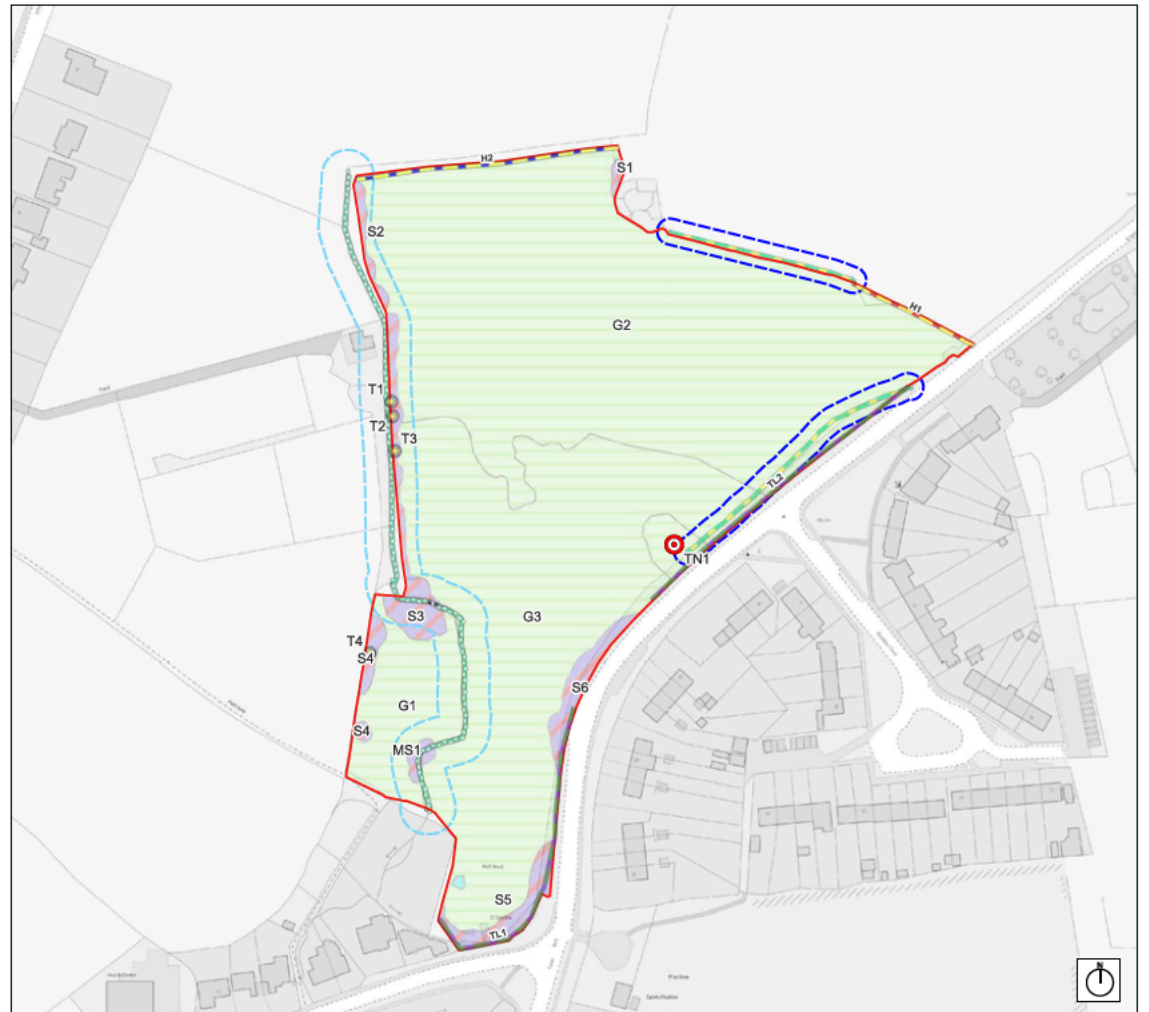
Two trees were considered to provide potential bat roosting opportunities which are to be retained and buffered within the proposals. The proposed lighting scheme will aim to minimise illumination of habitat corridors. The proposals will provide foraging and nesting opportunities for a range of common and widespread bird species and opportunities for additional enhancement will include the provision of bird and bat boxes on suitable retained trees across the scheme.

The brook is to be retained and buffered within the extensive green infrastructure.



Key

- Red Line Boundary
- Bramble scrub
- Hawthorn scrub
- Mixed scrub
- Other neutral grassland
- Ponds (non-priority habitat)
- Line of trees
- Native hedgerow - associated with bank or ditch
- Native hedgerow with trees - associated with bank or ditch
- Culvert
- Ditches
- Other rivers and streams
- 10m Watercourse Buffer
- 5m Ditch buffer
- Existing Medium Rural Tree



FPCR Environment and Design Ltd, Lockington Hall, Lockington, Derby, DE74 2RH | t:01509 672 772 | e: mail@fpcr.co.uk | w: www.fpcr.co.uk
 masterplanning | environmental assessment | landscape design | urban design | ecology | architecture | arboriculture

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3. Visioning Principles

This site would deliver a development that is high quality, sensitive to its landscape context, and does not cause significant harm to the setting of the village or the Green Belt.





Landscape Opportunities and Constraints

The landscape structure in the vicinity of the site is small to medium fields supporting a mix of agricultural and pastoral uses, enclosed by managed hedgerows and groups of mature trees.

The field pattern is irregular, and smaller more intimate fields and paddocks are close the village edge, and characteristic of other villages in the area. Due to the landscape structure and the topography, the landscape is semienclosed and views are often curtailed by field boundaries with occasional middle distance views towards settlements.

The site is accessible via a public right of way that leads from Brookside north through the site and connects with the A45, and a second footpath leading from School Lane to the west and converging at the southern end of the site. There are public views north from these footpaths that provide a rural outlook from the village.

The site is low quality agrarian land that is left fallow with areas of tussock grass, and shrubs have developed along the route of the brook. There are some mature trees within the hedgerow alongside the Fosse Way, which are important features along the street scene.

The built environment includes an area of housing to the east of the site on Fosse Way and Meadow Close. These are mostly terraced houses of brick construction with tiled roofs and two storeys, and front aspects of the perimeter blocks look west towards the site.

To the south along Brookside the houses are modern detached and semi-detached properties with general outlook to the north over the paddock land. There are no heritage assets within close proximity of the site.

Key

-  Site location boundary
-  Development Area
-  Public Right or Way
-  Existing Settlement
-  Existing Stream
-  Landscape Structure
-  Key views towards Site
-  Vista
-  Landscape buffer



3. Visioning Principles

A Vision: A Connected Place

The following pages give an indication of the development vision for the Land off Fosse Way, Stretton on Dunsmore.

The adjacent diagrams illustrate a number of key design principles captured within the subsequent proposed development framework:

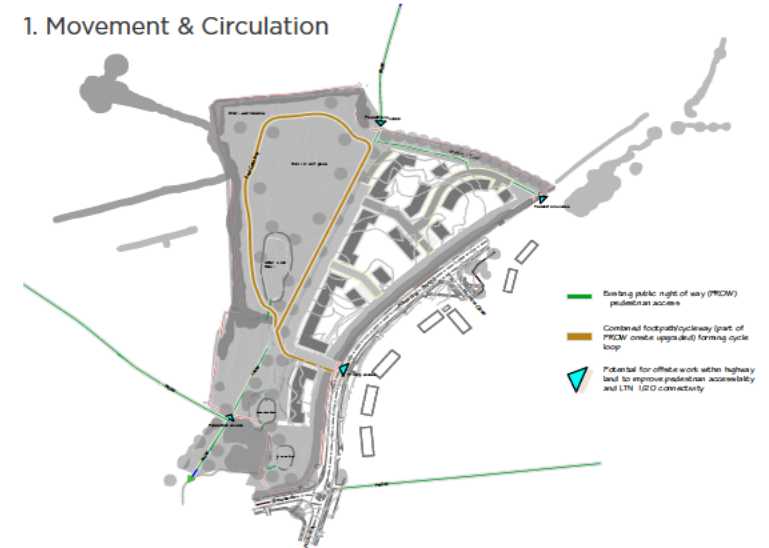
Movement and Circulation

The proposed movement framework for the site prioritises pedestrian movement and sustainable travel options in line with good practice urban design principles and government guidance such as LTN 1/20. Existing PROW routes are retained and enhanced where appropriate as part of an internal footway/cycle circuit within new public open space. A legible, well connected and permeable network of routes are set out, both within the site and linking to the wider movement framework offsite. There is the potential for additional work within the adjacent adoptable highway to further improve pedestrian connectivity and cycle infrastructure, such as a potential traffic calmed raised table junction at the primary access point into the site and an extension of existing footways along various parts of the Fosse Way boundary.

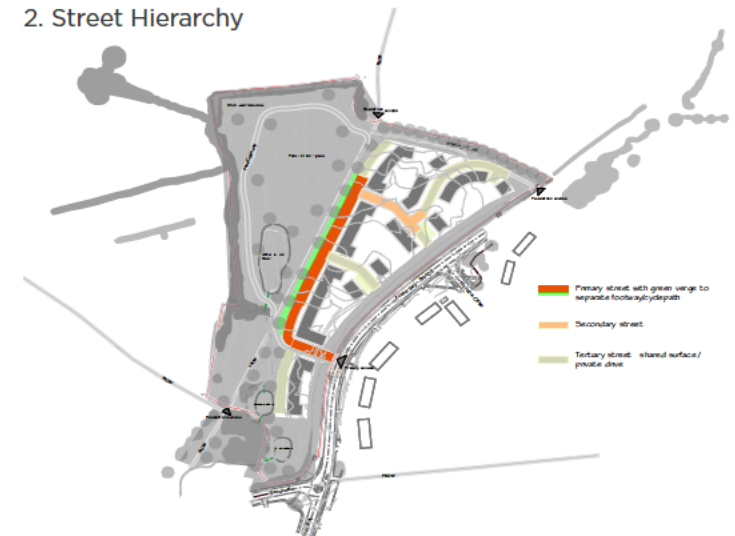
Street hierarchy

A simple street hierarchy is proposed. This structured network of streets, of varying levels of order and formality, will aid legibility and way-finding and contribute towards placemaking. The proposed street typologies compliment the wider movement framework with higher order streets utilising green verges, street trees and combined footpath/cycleways.

1. Movement & Circulation



2. Street Hierarchy



A Vision: A Connected Place

Block Structure

Efficient development parcels utilise perimeter block principles promoting a clear definition of public/private space. Built form fronts onto the public realm and open spaces, with dual aspect corner turning units maximising overlooking and private amenity areas securely enclosed internally within the blocks.

The block structure creates a simple hierarchy of spaces which reinforce the movement framework and promotes legibility within the layout. There is the potential to express vista stops and nodal elements within the development through set piece architectural elements.

Landscape

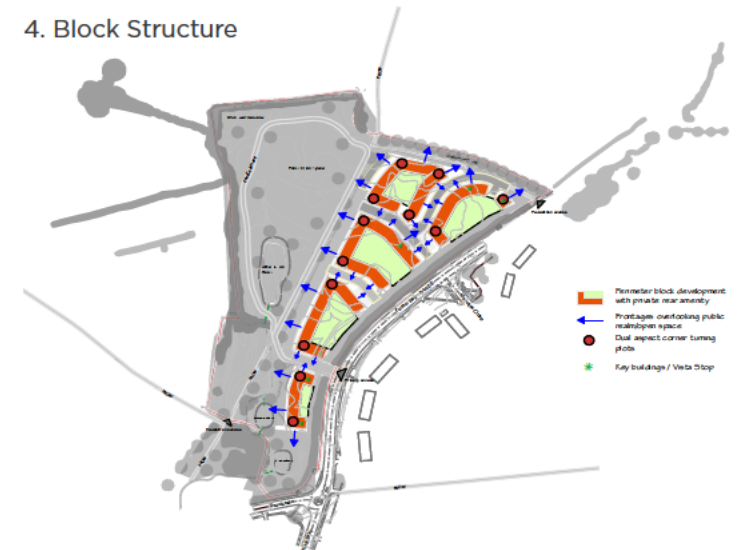
The proposed development will retain and enhance existing green infrastructure, complimented by the creation of attractive blue infrastructure features and supplemented by new landscaping where appropriate. Through considered design and specification there is an opportunity to increase wildlife diversity and habitat and in turn create biodiversity net gain.

The pattern of development promotes meaningful green open spaces that link with new homes, connecting residents and the wider community with public open space for play, exercise and amenity.

3. Landscape



4. Block Structure



Development Framework

The proposed development framework builds upon our landscape strategy, movement framework and block structure proposals and also follows local and national planning policy in terms of placemaking and potential development character:

Proposals will:

- establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit - NPPF para 126 (d)

and

- Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience - NPPF para 126 (f)



4. Illustrative Masterplan

Potential Development Opportunity

The adjacent plan demonstrates the potential to create a complimentary sequence of open spaces and built form with the provision of formal and non-formal green spaces – play areas, natural space and green movement corridors for the enjoyment of both new and existing residents.

The proposals can make a positive contribution to the character and quality of the immediate area through the creation of a sustainable, safe and attractive residential development whilst achieving a density appropriate to its setting and making efficient use of land, thus following planning policy guidance and adding additional diversity to development in the Village.



5. Conclusions

The purpose of this document is to consider the site, its context, the opportunities and constraints for housing development, and the landscape, visual, highways and drainage considerations. transportation planning consultancy, has been instructed by their client, Ashberry Strategic Land, to carry out an initial site feasibility assessment for a site in Stretton on Dunsmore, Warwickshire.

The landscape assessment outlined the implications of development on the landscape and visual environment, and its likely effects. It recommended that developing to the east of the public footpath, and utilising the western side for public open space would retain an undeveloped area between the east and west parts of the village. This extent of development would have a limited impact on the open green zone which is locally important.

The landscape structure has the potential to be enhanced through the development of the site and the POS, which will follow the Warwickshire Landscape Guidelines to strengthen the general landscape structure of the area.

The site is 3.5 hectares in size, and it is envisaged that approximately 1.2 hectares (35% of the site area) of land is appropriate to be developed for housing and associated infrastructure, with the remaining 2.3 hectares (65% of the site area) promoted as public open space.

The visual environment has some capacity for sensitive change as there are areas that are influenced by adjacent residential development, and where there would be limited effects to the characteristics through sensitive development proposals. The key view north out of the village could be maintained along the footpath with development set back to the east and an appropriate edge created. The likely visual effects of developing the eastern part of the site would be minor as there would be a small degree of change on the visual environment, but not of significant influence on the visual characteristics of the area.

In respect of the site access, it is possible to provide access to the site that meets with all relevant highway design standards. Any traffic generated by the development will use the classified highway network rather than the local village roads. In terms of flood risk and drainage, the proposed flows from developable areas of the site are to be restricted to greenfield run off rates and attenuated in a pond or storage structure prior to discharge to the existing watercourse ensuring that there is not any increase in flood risk downstream.

The essential characteristics of the Green Belt have been considered and the development would maintain an open green zone that separates the east and west of the village, despite some loss of openness on the site which is inevitable with development of green field sites. The development would not encroach further north than the adjacent development on Fosse Way, and would allow reinforcement of an existing field boundary with further planting to ensure that the visual impact is kept to a minimum.

This site would deliver a development that is high quality, sensitive to its landscape context, and does not cause significant harm to the setting of the village or the Green Belt.





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RUGBY BOROUGH LOCAL PLAN (2024 – 2042)



REPRESENTATIONS

PROPOSED SUBMISSION VERSION

March 2026

Project Name: Rugby Borough Local Plan – Regulation 19

Client Name: Ashberry Strategic Land

Prepared By: B Ward MRTPI

Signed: B Ward MRTPI

Date: 6th February 2026

Reviewer B Ward MRTPI

Signed B Ward MRTPI

Date: 3rd March 2026

Revision: 2

Executive Summary

Ashberry Strategic Land (“Ashberry”) supports the overall direction of the Rugby Borough Local Plan (RBLP) and the draft allocation of Land West of Fosse Way, Stretton-on-Dunsmore (Site ID 81) for c.40 dwellings. This Site is identified through the Sustainability Appraisal (SA) as the strongest performing option at Stretton-on-Dunsmore, well related to the settlement edge and capable of delivering significant green infrastructure, while Stage 2 site assessment confirms no significant constraints and good accessibility to key services and facilities. Ashberry therefore welcomes the site’s inclusion and its alignment with the role of Main Rural Settlements within the settlement hierarchy.

However, several aspects of the RBLP raise soundness concerns but are capable of being resolved with modification. First, the shortened plan period to 2042 risks falling below the NPPF requirement for a minimum 15-year horizon from adoption if the plan timetable is extended given anticipated adoption in 2027. Second, the housing requirement is set at the minimum Local Housing Need (LHN) of 10,812 homes, despite evidence of higher demographic need (HEDNA 2022) and significantly higher recent delivery rates across the Borough. No robust evidence has been produced to test whether this minimum housing figure can support the economic strategy, particularly the 287ha of employment land proposed through Policy S3, and the Homes–Jobs Alignment Paper provides no authority for concluding such alignment at the Rugby level. Affordable housing need (474 dpa) far exceeds what could be delivered under an LHN-based requirement. In addition, the SA does not examine reasonable alternatives to the housing requirement itself, despite earlier indications that higher growth should remain under consideration and acknowledgement that Coventry’s unmet need remains unresolved.

Ashberry also have concerns regarding the robustness of the supply buffer. The RBLP proposes an 8.5% contingency, significantly below the 17.5% buffer applied in the current adopted plan, despite continued delivery challenges at the Sustainable Urban Extensions (SUEs) around Rugby and the Borough’s heavy reliance on them through to 2042.

Ashberry respectfully seeks the following modifications:

- Extend the plan period to 2045 to secure the required 15-year horizon.
- Set a housing requirement above LHN, informed by demographic evidence, economic growth (287ha employment land), acute affordable housing need, and potential unmet need from Coventry.
- Increase the supply-side buffer to 15–20% to reflect SUE delivery risks and market absorption constraints.

- Disaggregate the housing requirement by settlement tiers and reinforce the strategic role of Main Rural Settlements, including Stretton-on-Dunsmore.
- Ensure site-specific policy wording for Site ID 81 remains flexible to enable effective masterplanning, particularly regarding frontage, green infrastructure, and pedestrian connections.

Table of Contents

Introduction	5
Strategy for Homes & Settlement Hierarchy	7
Land West of Fosse Way, Stretton on Dunsmore	17
Summary & Conclusion	21

1. Introduction

1.1 Background

- 1.1.1 These representations to the Rugby Borough Local Plan (“RBLP”) have been prepared by Marrons on behalf of Ashberry Strategic Land (“Ashberry”).
- 1.1.2 These representations are made to ensure the soundness of the RBLP, and we trust officers will find them helpful. These representations are made in the context of Land West of Fosse Way, Stretton-on-Dunsmore (Site ID 81) (“the Site”), which has been draft allocated for 40 units.
- 1.1.3 Ashberry supports the draft allocation of the Site, as well as the thrust of the RBLP’s proposed strategy for the rural areas and looks forward to working with the Council to bring the Site forward for much-needed new housing.
- 1.1.4 The Regulation 18 Preferred Options consultation for the RBLP was held in the Spring of 2025 to which Marrons, on behalf of Ashberry, submitted representations. The proposed submission version of the RBLP, currently the subject of this consultation, has brought about a number of changes, most notably the deletion of previously allocated sites and the addition of new ones. The Plan period has also been shortened from 2045 to 2042.

1.2 Policy Framework

- 1.2.1 The Government’s planning policy framework for England is contained within the National Planning Policy Framework (“NPPF”), December 2024 edition. Paragraph 234 of the NPPF states that where a Plan has reached Regulation 19 stage on or before 12th March 2025, and its housing requirement meets at least 80% of local housing need calculated using the updated Standard Method, policies in previous versions of the NPPF will apply. In this case, the transitional provisions of the NPPF do not apply and so at the present time, the soundness of the RBLP will be examined against the NPPF 2024.
- 1.2.2 Paragraph 36 of the NPPF sets out that local plans will be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are sound where they are:
- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and informed by agreement with other authorities, so that unmet need can be accommodated where it is practical to do so and consistent with achieving sustainable development;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent** with national policy – enabling the delivery of sustainable development in accordance with the policies of the Framework and other statements of national planning policy, where relevant.

1.3 Structure of Representations

1.3.1 These representations are structured as follows:

- **Section 2** – Housing requirement and spatial strategy for new homes (Policies S1 and S2)
- **Section 3** – Land at Fosse Way, Stretton-on-Dunsmore (Policy S6- Site ID 81)
- **Section 4** – Summary and Conclusions

2. Strategy for Homes and the Settlement Hierarchy (Policies S1 & S2)

2.1 The Housing Requirement

2.1.1 Policy S2 of the RBLP sets out a housing requirement of 10,812 homes over the Plan period 2025 to 2042, equating to an annual average of 636 dwellings per annum (“dpa”). As explained in paragraph 1.20 of the supporting text to Policy S2, published alongside the consultation, the figure of 636 dpa represents the Borough’s local housing need (“LHN”) calculated using the Standard Method. It has been multiplied by the number of years within the Plan period to arrive at the overall housing requirement.

Plan Period

2.1.2 As the Council will be aware, paragraph 22 of the NPPF requires local plans to look a minimum of 15 years forward from adoption. As the RBLP is anticipated for adoption in 2027, a plan period extending to 2042 means that even a minor slippage in timescales for plan preparation or the examination will result in the RBLP extending for fewer years than the minimum suggested by the NPPF from adoption. Whilst Ashberry supported the previous 2045 timescale as a pragmatic and forward-looking response to ensuring the RBLP covered the minimum required period, we do not support the current approach **and request that the end year for the RBLP is extended to 2045.**

LHN and the Housing Requirement

2.1.3 As explained by the Planning Practice Guidance (“PPG”), local housing need is an unconstrained assessment of the minimum number of homes needed in an area. This is the first step in the process of deciding how many homes need to be planned for. **It is different from establishing a housing requirement figure.¹ The Standard Method does not produce a housing requirement figure.²**

2.1.4 In contrast to the LHN, the housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. The PPG explains that:

“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities **should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations.** Where

¹ Paragraph: 001 Reference ID: 2a-001-20241212

² Paragraph: 002 Reference ID: 2a-002-20241212

authorities plan for higher growth this should not normally have to be thoroughly justified at examination.”³ [Emphasis Added]

2.1.5 That point is also reiterated at paragraph 49 of the NPPF, which states that the housing requirement may be higher than the LHN if, for example, it includes provision for neighbouring areas, responds to growth ambitions or infrastructure investment. These examples cited within the NPPF are clearly not intended as a “closed list” and accordingly, we expect the evidence base to grapple with the question of whether the housing requirement should be higher than the LHN. On this point, we would make the following observations:

Delivery Trends and Previous Assessments of Need:

2.1.6 The Housing and Economic Development Needs Assessment (“HEDNA”) 2022 estimated a need for 735 dpa for Rugby based upon the demographic projections available at the time. The figure 735 dpa for Rugby is arrived at using a trend-based projection driven by stronger population growth underpinned by changes in migration levels as well as fertility and mortality rates.

2.1.7 We note that the difference between the HEDNA 2022 approach and that espoused in the current draft of the RBLP is addressed in paragraphs 4.14 and 4.15 of the Updated Housing Needs Evidence (September 2025). Essentially, it is explained that the current (December 2024) NPPF provides no scope to use an alternative to the Standard Method. However, Paragraph: 040 Reference ID: 2a-040-20241212 of the Planning Practice Guidance (PPG) states that:

“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth, this should not normally have to be thoroughly justified at examination.”

2.1.8 Therefore, had the RBLP’s housing requirement responded to the demographic projections as assessed in the HEDNA 2022 and been higher as a result, the PPG says that this should not normally have to be “thoroughly justified” at examination. This contradicts the narrative provided within the Updated Housing Needs Evidence and we do not agree that the 2024 NPPF and associated PPG provide any reason to discount a higher housing requirement where previous and recent evidence indicates that need is greater than that indicated by the Standard Method.

2.1.9 In addition, between 2021/22 and 2023/24 housing delivery in Rugby has averaged 1,037 dpa. Having regard to monitoring data reported in the Rugby Borough Council Authority Monitoring

³ Paragraph: 040 Reference ID: 2a-040-20241212

Report (2023 – 2024), housing delivery has been consistently and materially more than the LHN since the 2018/2029 monitoring year, averaging 965 dpa since that time.

2.1.10 Over a longer time span and over that of the current plan period to date (2011 to 2024), the Council saw 690 dwellings per annum completed according to the Updated Housing Needs Evidence (September 2025). Whilst this is an extensive period and does not reflect more recent trends, even then the rate of completions has been significantly higher than the proposed RBLP housing requirement. Five years post adoption of the current Local Plan, the Updated Housing Needs Evidence (September 2025) reports a far higher average completion rate of 970 dwellings per annum.

2.1.11 Previous assessments of need and delivery trends all point towards housing needs being greater than the LHN set out in the draft RBLP.

Economic Growth:

2.1.12 Economic development needs were considered in the HEDNA and more recently within the West Midlands Strategic Employment Sites Study 2024 (“WMSESS”). The WMSESS calculates needs for large-scale employment sites but does not apportion that need to individual local authority areas. Rather, it apportions need to a series of opportunity areas including to Area 7, which largely corresponds to Rugby Borough Council’s administrative area.

2.1.13 That wider strategic need alone generates a requirement of 139.5ha of strategic industrial employment land. When non-strategic needs for industrial land are considered, the calculated need for all industrial land stands at 202ha net of committed supply. This is before any unmet economic development needs from Coventry are considered.

2.1.14 The HEDNA 2022 concluded that there was no case to uplift the housing requirement to support economic growth, except potentially in North Warwickshire. However, this conclusion was made in respect of a lower assessment of employment land needs in Rugby, which did not reflect strategic industrial needs within the wider sub-region.

2.1.15 The WMSESS has subsequently sought to do so. and in line with this, Policy S3 of the emerging RBLP plans for a total of 287 hectares of employment land over the Plan period. Within previous consultations, no part of the evidence base explored whether the overall housing requirement is sufficient to support the level of employment growth planned for, noting that it seeks to respond to wider sub-regional needs as well as the Borough’s own needs. This evidence has now been published in the form of the Homes – Jobs Alignment Paper (December 2025).

2.1.16 The Alignment Paper has been commissioned jointly across the Coventry and Warwickshire Housing Market Area (including North Warwickshire, Nuneaton and Bedworth, Rugby, Stratford-on-Avon and Warwick Councils) (“HMA”) and considers alignment over three periods, but none

of these correspond to the Plan period of the RBLP. The Alignment Paper also does not consider the alignment of homes and jobs within Rugby Borough within the context of the RBLP.

2.1.17 Whilst we note the point made in several parts in the evidence base that some of the employment land provision in Policy S3 is to meet sub-regional needs rather than the Borough's own, **there is a clear imperative to align homes and jobs provision to achieve sustainable patterns of growth by ensuring people can live close to where they work.**

2.1.18 The Alignment Paper does not demonstrate this has been achieved in the context of the RBLP because it does not calculate the labour force required to support Rugby's employment provision, nor does it test whether the housing figure in the RBLP can generate such labour supply.

2.1.19 In our view and using standard assumptions, Rugby's planned housing requirement (10,812 homes) is **plainly insufficient to support the workforce needed for Rugby's employment land provision (287 ha). The Alignment Paper does not demonstrate otherwise.**

2.1.20 **Therefore, there is a clear case the Local Plan housing requirement should be increased to accommodate the level of planned employment growth.**

Affordable Housing:

2.1.21 The PPG states:

“The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”⁴

2.1.22 The Updated Housing Needs Evidence (September 2025) estimates that Rugby Borough's affordable housing need is 474 dpa. This represents 74% of the Borough's LHN (636 dpa). Therefore, it stands to reason that the housing requirement, which is based only upon local housing need calculated using the Standard Method, will not come close to meeting the objectively assessed need for affordable homes presented within the housing needs evidence given that the viable level of affordable housing contributions sits at 20-30%.

2.1.23 The Updated Housing Needs Evidence (September 2025) does provide comment on the above matter. Essentially, it concludes on an HMA-wide basis that the amount of housing required to meet affordable housing needs in full would be unrealistic. It also refers to the technical

⁴ Paragraph: 024 Reference ID: 2a-024-20190220

complexity of making a link between affordable housing needs and the overall housing requirement.

2.1.24 We agree that it is often not realistic to meet a local authority’s affordable housing in full and there is no requirement in national policy to do so. However, increasing the overall housing requirement will deliver more affordable homes than would otherwise come forward based on the minimum LHN alone and therefore, to use the PPG’s phrasing, “help to deliver” the required number of affordable homes over the Plan period. Being unable to meet the affordable housing need in full does not mean the matter should be ignored. As set out above, Rugby Borough has seen recent annual completions significantly in excess of the LHN and therefore, the Borough is able to realistically sustain a higher rate of housebuilding than the bare minimum.

2.1.25 Whilst making the link between the overall housing requirement and the affordable housing need may be complex, this does not obviate clearly stated national policy on the subject, which requires consideration of uplifting the housing requirement to meet the affordable housing need. This has not been undertaken within the wider evidence base. We would ask that the Council explore the matter further.

Sustainability Appraisal

2.1.26 The Sustainability Appraisal (“SA”) of the Rugby Borough Local Plan (December 2025) by AECOM, in essence, states that there is no reason to set the housing requirement higher than the minimum required by the LHN.

2.1.27 This statement is somewhat surprising given the statement at paragraph 5.2.29 of the Regulation 18, Preferred options SA which stated that “**...there is a clear high-level case for remaining open to the possibility of higher growth scenarios, subject to consideration of supply options below. This high-level case primarily relates to affordable housing need.**”

2.1.28 The Regulation 19 SA also acknowledges (at paragraph 5.2.8) there is the issue of potential unmet housing need from Coventry that is still unresolved.

2.1.29 Coventry City Council anticipates meeting its own needs for housing to 2041. However, this will need to be kept under review given that Coventry’s capacity to deliver the amount and rate of housing growth necessary to meet those needs will be subject to examination by the Secretary of State. In addition, Coventry’s emerging Local Plan only runs to 2041 and given that Rugby’s Local Plan looks ahead to 2042, it is unclear whether Coventry will be able to meet its own housing needs over that timescale. Given the uncertainty, it would be sensible for Rugby Borough Council’s emerging local plan to include a contingency to address Coventry’s unmet need should it arise in the Plan period to 2042.

2.1.30 Despite SA’s position in respect of the housing requirement, it does consider “higher growth” scenarios but does so in the context of the overall supply rather than the housing requirement itself. The housing requirement is distinct from the supply to meet it, and it is apparent to us that the SA has not considered any alternative housing requirement apart from the proposed housing requirement, which is informed by the minimum LHN figure.

2.1.31 In our view, the judgements about reasonable alternatives to the housing requirement should be informed by the appropriate evidence to conceptualise and explain the options considered. For example, the evidence could consider the number of homes required to support a high economic growth scenario, to address part of Coventry’s unmet need should that arise or to bring forward more affordable homes. Rather than undertaking this exercise, however, the SA simply seeks to justify the Council’s intended approach to the housing requirement rather than framing and testing reasonable alternatives to it.

Housing Requirement (Changes Requested)

2.1.32 To support the soundness of the Plan, we recommend the following changes and modifications:

Adopt a plan period of 2025–2045 to satisfy NPPF paragraph 22.

Set a housing requirement above LHN, informed by:

- higher demographic need and previous rates of delivery;
- employment-led housing need linked to the 287 ha employment land provision,
- affordable housing need; and
- Future proof against potential unmet needs from Coventry.

2.2 Spatial Strategy

Settlement Hierarchy

2.2.1 Policy S1 of the Consultation Document identifies a settlement hierarchy and states that new development should be of a scale commensurate with the services and facilities of the settlement. The settlement hierarchy identifies three tiers of settlements, with the Rugby urban area sitting at the top, followed by the main rural settlements and other rural settlements.

2.2.2 The classification of rural settlements has been considered in the Rugby Borough Council Rural Sustainability Study December 2024. Within the Study, each of the Main Rural Settlements score within a relatively consistent range are distinct in terms of their relative performance from other rural settlements (i.e. the Rural Villages) in terms of the range of services they provide. We therefore support the retention of a two-tier rural settlement hierarchy.

2.2.3 Overall, Ashberry consider that the settlement hierarchy, as presently drafted and as it relates to Stretton-on-Dunsmore is sound and justified by the evidence base.

Spatial Apportionment of Housing

2.2.4 Policy S2 sets out a strategy for homes and breaks the amount of housing planned for into sources of supply. To clearly articulate the Plan’s spatial strategy, we recommend the housing figures within Policy S2 are also broken down against tiers of the settlement hierarchy and this is accompanied by a statement that clarifies the role and function of each tier of the settlement hierarchy. The key role of the Main Rural Settlements in accommodating development needs over the Plan period should be reinforced within Policy S2.

2.2.5 Paragraph 1.21 of the RBLP sets out that new homes will be focused at the Rugby urban area. Given the spatial characteristics of the Borough and the settlement hierarchy, Ashberry consider that a principal focus on Rugby as a focal point for growth is inevitable. Despite the primacy of Rugby within the growth strategy, there is a very high level of committed growth through adopted Local Plan. As recorded at various points within the SA Sustainable Urban Extensions (SUEs) around Rugby have all experienced delivery challenges.

2.2.6 In light of the acute affordable housing needs explored above, it is fully appropriate that the Council balance growth through large SUEs on the fringes of Rugby, with smaller, more viable and deliverable sites allocated at the Main Rural Settlements to ensure a balanced pattern of growth, but also to ensure the delivery of much-needed affordable homes within the Plan period.

2.2.7 Ashberry agree with the conclusions of 5.4.9 of the SA that the edge of Coventry within the Borough of Rugby is not a realistic option for housing growth, given the strong, clearly defined boundary to Coventry’s growth eastwards which is presented by the A46. The capacity of the A5 remains a significant barrier to any further strategic growth on the edge of Hinckley even if suitable sites could be identified.

2.2.8 Notwithstanding our comments above in the context of the housing requirement, given the spatial characteristics of the Borough, Ashberry agree that directing growth toward the Main Rural Settlements to rebalance the spatial strategy is a sensible and sustainable choice. The reasonable alternatives to this (such as increased apportionment to Rugby Town) have been tested thoroughly within the SA. Ashberry also consider it appropriate in formulating the growth strategy to consider whether Main Rural Settlements relate spatially to any higher order settlements (e.g. Rugby itself or Coventry). We note that that Stretton-on-Dunsmore, for example, enjoys good links to Coventry and that as such, it is logical to prioritise growth in this location. This position was acknowledged by the Inspector examining the now adopted Local Plan, identifying Stretton-on-Dunsmore as a location for growth.

2.2.9 Ashberry note that of the four growth scenarios considered, growth at Stretton-on-Dunsmore in the amount of 113 dwellings is treated as a constant across all, in common with several other Main Rural Settlements. Given the commentary above, we consider that this choice is justified and given the clear sustainability credentials of the settlement and the wider strategic matters discussed above.

Supply Buffer

2.2.10 The housing requirement and the plan-led supply to meet that requirement are distinct but related matters. Paragraph 1.22 of the RBLP sets out that supply is allocated for 8.5% more than the minimum required. Whilst Ashberry support the principle of a supply-side contingency, we are concerned that 8.5% is insufficient to allow the RBLP to respond to unforeseen events or stalled delivery. Of course, there is no single scientific or “correct” approach to the level of the buffer, but circumstances in Rugby Borough indicate that a higher buffer should be entertained than 8.5%, namely:

- As set out in the Development Needs Topic Paper (December 2025), the current Local Plan was adopted with a supply-side buffer of 17.5%;
- By its own admission, the Council has SUEs that are struggling to deliver the required number of new homes and as these sites will remain a significant source of supply within the Plan period to 2042, this would suggest that caution is warranted and therefore a higher buffer; and
- Because of the spatial characteristics of the Borough, delivery will inevitably be weighted towards Rugby and there are only so many homes that can be sold and therefore built within any particular area at any particular time (market absorption). Given that the aforementioned SUEs are all concentrated around the town of Rugby, Ashberry would suggest that this, too, points toward the need for a higher buffer.

Green Belt

2.2.11 Paragraph 148 of the National Planning Policy Framework directs that where it is necessary to release Green Belt, priority should be given to previously developed land followed by grey belt land and then other Green Belt locations. The review of Green Belt boundaries must also promote sustainable patterns of growth.

2.2.12 The Council’s Green Belt Exceptional Circumstances Topic Paper makes clear that Rugby has development needs cannot be met without reviewing the Green Belt. National policy requires that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced, and the Topic Paper confirms that Rugby has undertaken the necessary sequential assessment: brownfield opportunities have been thoroughly examined through the Council’s

Urban Capacity Assessment demonstrating that the development potential of urban sites has been effectively exhausted once deliverability and viability risks are taken into account.

- 2.2.13 In a Borough where most directions of growth are functionally constrained by the Green Belt, the Topic Paper recognises that realistic options for accommodating housing are largely within Green Belt locations.
- 2.2.14 This is reinforced by the spatial geography of Rugby, where the most sustainable development patterns lie either adjacent to Rugby town or toward the Coventry fringe and the larger rural settlements, such as at Stretton-on-Dunsmore. These are locations with existing service provision, sustainable transport connections and the potential to integrate new development without undermining the wider Green Belt strategy.
- 2.2.15 Given that non-Green Belt areas on the outskirts of Rugby are already heavily committed, and there is no further urban capacity to draw upon, the Topic Paper identifies a clear strategic case for Green Belt release to support the updated Local Plan.
- 2.2.16 Within that strategic context, the release of land at Stretton-on-Dunsmore is also justified at the site level. The LUC Green Belt Contribution Study shows that land in the vicinity of the Site performs only a weak or no contribution to key Green Belt purposes, noting minimal contribution to preventing sprawl, preventing neighbouring towns merging, and preserving the setting of historic towns. The Study’s mapping identifies this area as potentially suitable “Grey Belt,” the category of Green Belt land that current national policy expects authorities to prioritise where release is necessary.
- 2.2.17 Its weak functional Green Belt role, combined with its ability to form a logical, contained extension to the settlement, supports the conclusion that its release would not undermine the integrity of the wider Green Belt.
- 2.2.18 The Sustainability Appraisal reinforces this by finding that the Site is the strongest performing option at Stretton-on-Dunsmore, benefitting from proximity to services, accessible connections to the A45 and Coventry, and the ability to form a well-contained and sensitively designed addition to the village. It highlights that the Site relates well to the settlement edge and offers the opportunity to integrate a large area of open and green space. This is significant because the ability to deliver a meaningful landscape buffer, new habitats, and publicly accessible open space enhances the beneficial use of the Green Belt.
- 2.2.19 Taken together, these factors amount to a clear set of exceptional circumstances. Strategically, Rugby cannot meet its housing needs without reviewing Green Belt boundaries, and the Borough’s evidence confirms that the urban area and non-Green Belt land cannot shoulder the burden of future growth.

2.2.20 At the site level, Land West of Fosse Way, Stretton-on-Dunsmore performs weakly against Green Belt purposes, is identified as potential Grey Belt, occupies a sustainable and well-connected location, and delivers extensive new open space and biodiversity enhancements. The SA confirms its suitability and comparative advantages over other reasonable alternatives. In this context, the release of the Site represents a justified, sustainable and proportionate adjustment to the Green Belt, supported by clear strategic need and robust site-specific evidence.

2.2.21 It is noted that the Council has published a Green Belt Contribution Study (Strategic Assessment) dated October 2025 by LUC. Figures 4.2 to 4.5 of that study set out the contribution that each land area of the Borough makes to purposes (a), (b), or (d). For the subject Site and vicinity, the assessment sets out the following contributions to Green Belt purposes:

- Purpose A: Weak/No Contribution
- Purpose B: Weak/No Contribution
- Purpose D: Weak/No Contribution

2.2.22 Figure 4.7 of the Green Belt Contribution Study therefore confirms that the Site is within an area of the Borough that is “potentially suitable for definition as Grey Belt.”

2.2.23 Ashberry welcomes recognition of the Site as potential Grey Belt and considers that the assessment produced by LUC is soundly-based.

Spatial Strategy (Changes Requested)

2.2.24 To support the soundness of the Plan, Ashberry recommends the following changes and modifications:

- Disaggregate the housing requirement in Policy S2 by settlement tiers and define the role and function of each settlement in the spatial strategy;
- Clarify and reinforce the role of Main Rural Settlements in the spatial strategy within Policy S2;
- Increase the supply-side housing buffer above 8.5% (to a materially higher figure) of between 15% and 20%; and
- Acknowledge Stretton-on-Dunsmore’s sustainability and strategic credentials in the spatial strategy text.

3. Land West of Fosse Way, Stretton on Dunsmore (Policy S6)

3.1 Introduction

3.1.1 As set out above, Ashberry is promoting Land west of Fosse Way, Stretton-on-Dunsmore for residential development. A Vision Document setting out how the Site could be developed acceptably is appended to these representations at **Appendix 2**. Below we set out our representations on the planning merits of this site with reference to the evidence base.

3.1.2 The Site is allocated in Policy S6 (Residential Allocations) for 40 homes (Site ID 81). The Annex to the RBLP entitled “Development site allocations” contains a detailed breakdown of development requirements.

3.1.3 Ashberry Strategic Land **supports** the allocation of Site ID 81 and considers that it reflects the Council’s chosen spatial strategy, as well as being suitable and deliverable for a high-quality residential scheme

3.2 Site-Specific Representations

Sustainability Appraisal

3.2.1 The SA sets out a review of sites promoted at Stretton-on-Dunsmore. The SA notes that there is primary school capacity for around 150 homes and that the settlement benefits from good links to the A45 and to Coventry.

3.2.2 The analysis within the SA sets out that Site 81 to the northeast is considered to be the most strongly performing. It is stated that the Site relates well to the settlement edge and has the potential to be well contained, as well as presenting the opportunity to deliver a significant new area of open/green space.

3.2.3 The SA concludes that the Site is the strongest performing site within the village against SA objectives. Ashberry agree.

Stage 2 Site Options Assessment

3.2.4 The Stage 2 Site Options Assessment draws on the earlier Housing and Economic Land Availability Assessment (“HELAA”) and comprises sites which passed the initial sifting exercise undertaken as part of the HELAA.

3.2.5 Land West of Fosse Way, Stretton-on-Dunsmore was subject to a detailed technical appraisal within the Stage 2 Site Options Assessment, drawing upon other parts of the evidence base as appropriate. The Council’s assessment concludes that the surrounding road network has low levels of congestion, and the Site has moderate assessed levels of accessibility, given that it is

walkable to the services and facilities in the village centre. In addition, it is set out that heritage and ecology constraints were not identified, and landscape sensitivity is medium/low. The promoters have submitted information to the Local Planning Authority indicating that on-site archaeology can be addressed through the appropriate mitigation. Finally, it is stated that the Site potentially makes a strong contribution to at least one Green Belt purpose, albeit it is not identified which purpose that is. Clarity on this point is requested.

3.2.6 Ashberry consider that the Site has low landscape sensitivity and that is supported by the analysis carried out by IDP set out at **Appendix 2**. In short, the Site is close to the village edge and well-associated with existing built form. Given the landscape structure and the topography, the Site is semi-enclosed and views are often curtailed by field boundaries with occasional middle distance views towards settlements.

3.2.7 The Site is in a demonstrably sustainable location and walkable to nearby services and facilities via both the proposed all-purpose access onto the Fosse Way, as well as the on-Site Public Right of Way (PRoW), which connects into the village.

3.2.8 In terms of Green Belt purposes, for the reasons set out in IDP's report at **Appendix 1** Ashberry do not consider that the Site performs strongly against any Green Belt and this is supported by the Council's own assessment as set out above. Nonetheless, the allocation of the Site carried with it the opportunity to significantly enhance the beneficial use of the Green Belt through the creation of new habitats and public open space.

Development Requirements

3.2.9 The Annex to the Consultation Document sets out a series of development requirements. These are addressed in turn below.

3.2.10 In general, Ashberry consider the development requirements to be too prescriptive for the purposes of plan-making and have not be supported by technical evidence. Many of the matters raised below can be addressed through detailed masterplanning undertaken as part of the application stage.

3.2.11 The first two requirements relate to the creation of approximately 2.3ha of public open space on the western half of the Site, as well as the retention of existing mature trees and hedgerow onto Fosse Way, except for that needed to facilitate access.

3.2.12 Ashberry agrees with the broad thrust of these criteria. As evidenced by the Vision Document, Ashberry envisages delivering a significant part of the Site as green infrastructure and remains committed to that. However, it should be noted that the requirement to deliver all the 2.3ha as public open space needs to be balanced against the need to deliver sufficient Biodiversity Net Gain and development viability. Accordingly, it may be necessary for some of the retained green

space to not be publicly accessible to ensure that newly created habitats can thrive without human interference. Ashberry recommend that this nuance is recognised within any subsequent policy allocating the Site and that the quantity of public open space on the site should be determined through prevailing policy requirements and the detailed masterplanning process through a planning application.

3.2.13 As set out within the Vision Document at **Appendix 2**, the emerging development proposals for the Site seek to retain the mature vegetation along the Fosse Way.

3.2.14 The next requirement is for development to primarily face onto the Fosse Way and secondarily face onto the crated green spaces within the Site. This is a departure from the principles established within the previously submitted Vision Document by IDP at **Appendix 2** and no justification has been provided for this.

3.2.15 The aspiration within the Vision Document is to maximise frontages onto the internal roads and the newly created public open space/green infrastructure, to ensure attractive internal routes, natural surveillance and, critically, encourage the useability of the open space. In addition, this approach safeguards the mature vegetation which fronts onto the Fosse Way, as required by other elements of the policy.

3.2.16 Therefore, Ashberry encourage the Council to not adopt such a prescriptive requirement and to allow this matter to be explored through the masterplanning as part of any subsequent planning application. **Accordingly, Ashberry requests the deletion of this criterion.**

3.2.17 The next criterion requires the creation of a direct pedestrian access onto Brookside at the southern edge of the Site. Ashberry notes that the PRow running through the Site already connects onto Brookside and at a closer point to the core of the village than the southern extremity of the Site. That would make the requirement for a further pedestrian link onto Brookside superfluous. That said, Ashberry consider that this matter can be explored through the detailed masterplanning process and the associated technical work at the application stage. **Accordingly, Ashberry recommend either the deletion of the criterion altogether.**

3.2.18 Ashberry's note the requirement to ensure that the PRow is overlooked, which again introduces a tension with the requirement that development must primarily front onto the Fosse Way.

3.2.19 Lastly, in relation to contributions towards improved public transport provision, Ashberry is not averse to this provided that any off-site financial contributions meet the relevant tests for planning obligations set out within the NPPF and CIL Regulations.

3.2.20 To summarise, it is requested that the following amendments be applied to the wording of the draft site allocation 81.

- Delete the requirement of 2.3ha open space and amend to require the provision of adequate levels of public opens space.
- Retain the requirement to protect mature vegetation along the Fosse Way, but remove the prescriptive requirement that development must “primarily face onto the Fosse Way.”
- Delete the Fosse Way frontage requirement entirely, allowing frontage, street hierarchy and surveillance to be resolved through masterplanning in the context of a planning application.
- Delete the requirement for an additional pedestrian link to Brookside, as it duplicates the existing PRow connection.
- Clarify that whilst the PRow will be retained, it may need to change from its current alignment to accommodate good design principles and allow flexibility to ensure the development is deliverable and viable or omit reference to the PRow entirely; and
- Ensure internal consistency within the policy so that the requirement to “overlook the PRow” does not conflict with the removal of the Fosse Way frontage requirement.

The purpose of these proposed amendments is to provide sufficient flexibility to allow development to be viably delivered and, therefore, the site contributes towards the objectives of the Local Plan.

4. Summary & Conclusion

4.0.1 Ashberry Strategic Land supports the allocation of Land West of Fosse Way, Stretton-on-Dunsmore. The Site is suitable and deliverable.

4.0.2 Ashberry encourages the Council to consider whether it remains appropriate to plan only for the Borough's minimum LHN figure calculated using the Standard Method given the matters discussed above, all of which point to the requirement for housing being greater than the LHN.

4.0.3 Whilst Ashberry recognises the primacy of the Rugby urban area within the spatial strategy, Ashberry supports the Council's approach of allocating sites within the Main Rural Settlements to maintain a balanced supply of housing sites and to ensure that all parts of the Borough can benefit from new growth.

4.0.4 Ashberry trusts that the Council will find these representations helpful in progressing a sound and legally compliant plan. Ashberry would welcome a meeting with the LPA to discuss the Site further.

Appendix 1: Grey Belt Assessment by IDP

Appendix 2: Vision Document by IDP



Waterfront House, Waterfront Plaza
35 Station Street, Nottingham, NG2 3DQ

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Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official
use only)

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

Rugby Borough Council Proposed
Submission Local Plan

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

This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text" value="-"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="-"/>	<input type="text" value="Ben"/>
Last Name	<input type="text" value="-"/>	<input type="text" value="Ward"/>
Job Title (where relevant)	<input type="text" value="-"/>	<input type="text" value=""/>
Organisation (where relevant)	<input type="text" value=""/>	<input type="text" value=""/>
Address Line 1	<input type="text" value=""/>	<input type="text" value=""/>
Line 2	<input type="text" value=""/>	<input type="text" value=""/>
Line 3	<input type="text" value=""/>	<input type="text" value=""/>
Line 4	<input type="text" value=""/>	<input type="text" value=""/>
Post Code	<input type="text" value=""/>	<input type="text" value=""/>
Telephone Number	<input type="text" value=""/>	<input type="text" value=""/>
E-mail Address (where relevant)	<input type="text" value=""/>	<input type="text" value=""/>

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

Name or Organisation:

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

Local Plan Paragraph		Local Plan Policy	S1, S2, S6	Policies Map	
Site ID	81				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	x
(2) is Sound	Yes		No	x
(3) complies with the Duty to co-operate	Yes		No	x

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

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

Please see submitted representations.

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

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

Please see submitted representations.

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

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

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

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

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

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

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please see submitted representations

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. If you have used AI to produce or substantially alter your representation, please declare which tool you have used, how it was used, and what checks you have undertaken to ensure the AI-produced material is accurate.

N/A

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

The Rugby Borough Council Privacy Notice for Development Strategy is available here:

<https://www.rugby.gov.uk/w/privacy#development-strategy>

The Planning Inspectorate's privacy notice can be accessed here:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>