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Rugby Local Plan 2025-2042

Education Provision

Proposed Development at Lodge Farm, Rugby

Jan Kinsman
March 2026

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1 Introduction

- 1.1 EFM was appointed to consider and report on the education impacts and mitigation requirements arising from proposed development at Lodge Farm as part of the response made to RBC's Preferred Options consultation in 2025.
- 1.2 Lodge Farm is located south west of Rugby and is being promoted, in the context of Rugby Borough Council's emerging New Local Plan, for the development of up to 2,680 new homes.
- 1.3 Whilst Rugby Borough Council (RBC) is the local planning authority for the area of the proposed development, the local education authority with responsibility for ensuring a sufficiency of school places is Warwickshire County Council (WCC).
- 1.4 This report considers how RBC has responded to the Lodge Farm proposals and updated its proposals for future housing in its Regulation 19, Proposed Submission Local Plan consultation, from an education provision perspective.
- 1.5 This report explains that RBC has not recognised the benefits that a substantial allocation at Lodge Farm could provide and continues to propose a 'dispersal strategy'. It has restricted the plan period, which has reduced the expected education implications. However, RBC's Topic Paper: Education provides evidence of the need for additional secondary education capacity during the plan period, for which no firm solutions are identified.
- 1.6 It remains the case that Lodge Farm could provide a number of benefits, including a large site for a secondary school. This would provide flexibility for further secondary education capacity to be provided when required. In addition, it would not require reliance on the possibility of expansion of existing schools which – while "*technically feasible*" - may prove very expensive and/or problematic in practice, and would do nothing towards the longer term nor towards improving the distribution of secondary schools in the borough.

2 Findings of EFM's 2025 Report and RBC's Response

2.1 This report does not restate all the detail set out in EFM's May 2025 report. However, the conclusions of that report were as follows:

1. The proposed development at Lodge Farm will include delivery of social infrastructure to support the creation of a new sustainable community. The proposals will deliver new early years and primary capacity on-site at an early stage in development construction. Financial contributions will likely be required for additional special education needs facilities that would be provided off-site.

2. For secondary education, the demand from the proposed development supports provision being made on-site. Existing secondary schools are currently under pressure, despite the opening of Holton School in 2021 situation, and plans are being drawn up to provide more capacity in Rugby North by expanding the existing school to deal with the pressure from existing housing.

3. In Rugby South a new secondary school is already planned within the South West Rugby development (that was allocated in the current local plan). Development at Lodge Farm will provide for a new secondary secondary school to be brought forward on-site when it is required. However, for the shorter term, it will be beneficial for establishment of the proposed South West Rugby secondary school that demand from Lodge Farm be accommodated there.

4. The delivery of a substantial amount of new housing in one location will provide a number of practical advantages over delivery of housing via smaller separate allocations, especially for delivery of education infrastructure. In addition, development at Lodge Farm can support delivery of the planned new secondary school at South West Rugby, which can cater for the demand arising from Lodge Farm in the early stages of its development.

2.2 Lodge Farm remains an excluded site in RBC's Submission Local Plan consultation. However, the 6 January 2026 Cabinet Report which considers the Submission Local Plan, includes (starting on page numbered 24) a section with some comments on 'omission sites', including Lodge Farm.

2.3 RBC sets out the background of a smaller development at Lodge Farm that was considered in the March 2019 Local Plan Examination, and the measures now taken to address the previous concerns, as part of the Lodge Farm proposals including provision for a new secondary school. RBC states that the scale of development would not support a secondary school on its own and would be expected to draw from a wider area. It is also stated that a school could not be opened before 2042, which is said to be based on the promoter's evidence - although this was not stated in EFM's report. This is a partial view, and fails to demonstrate that RBC has given any consideration to the positive benefits that Lodge Farm offers.

- 2.4 It is fair to say that EFM's report did not suggest Lodge Farm alone would sustain a new secondary school. Nor did it suggest that the school would be needed in the early years of the development - this latter aspect was informed by the established proposal for a new secondary school at South West Rugby.
- 2.5 However, what the report did draw attention to was the potential for the school to meet the needs of surrounding areas, being located in an area of the borough that has no existing secondary school, and to provide scope for long term growth in provision – thus providing two important and substantial long term benefits: a) better serving existing rural area residents who currently have to travel considerable distances to secondary school, and b) the provision of a 10ha secondary school site suitable for long term expansion and development that would ensure long term capacity and flexibility – and would also delivery certainty to support long term planning of school places.
- 2.6 The report recognised the proposed new secondary school at South West Rugby would be much closer to Lodge Farm than existing schools, and potentially within 5 kms (or 3 miles). It explained that, prior to the Lodge Farm secondary school being provided, the additional demand from Lodge Farm would benefit the new South West Rugby school by helping create critical mass and viability when that school is established.
- 2.7 There is nothing to indicate that RBC has considered the above points.

3 Proposed Submission Local Plan and Infrastructure Evidence Base

- 3.1 RBC's Preferred Option consultation 'evidence base' web page noted that Its Infrastructure Delivery Plan *"will be created later in the plan-making process"*, and no substantive evidence base information was available to explain RBC's thinking on education matters. Some references to education were available in the Interim SA Report, March 2025, as referred to in EFM's May 2025 report. This included identification of primary school capacity as a key issue affecting spatial strategy whilst acknowledging that, *"the reality is that generating a firm understanding is challenging, and there will be a need for ongoing dialogue and detailed work"*.
- 3.2 It is notable that, for its Proposed Submission consultation, RBC has shortened the local plan timescale to 2025 – 2042, from 2024 – 2045 as proposed in its Preferred Options. This has the effect of requiring over 2,000 fewer dwellings to be built in the plan period, down to 10,812 from 12,978. Unsurprisingly, this has reduces the expected need for additional school places.
- 3.3 The Proposed Submission Local Plan evidence base includes an Infrastructure Delivery Schedule. This *"specifies what infrastructure is required to support development and outlines how it will be provided."* It is a list of projects and sources of funding, with additional comments on some projects, where such information is available.
- 3.4 For education, previously established new primary schools are specified to support large developments at South West Rugby and Houlton and Ashlawn Road, as is a 6 form entry secondary school at South West Rugby. In addition, expansion of Avon Valley School is stated a critical or secondary school places – and this project is already underway, with public consultation in Summer 2025 and feasibility work ongoing.
- 3.5 The potential need for other education provision is identified only in general terms, without any indication of locations. This does not suggest that the *"ongoing dialogue and detailed work"* related to primary school capacity referred to in March 2025 has been undertaken, although some work has been undertaken as explained in paragraph 3.10 below.
- 3.6 It is noted that WCC has indicated it would be *"technically feasible"* to expand up to three secondary schools by an additional form of entry. However, there is no information about the costs and desirability of such projects, the practical issues or whether the schools would agree to expansion. Reliance on this approach leaves considerable uncertainty about the deliverability of additional secondary school places.
- 3.7 To support its land use planning decisions RBC has commissioned a Topic Paper on Education, which is dated December 2025 and provided by Edge Analytics Ltd using a mathematical model to predict future education needs in the borough. The introduction to the report explains that the purpose of the model is *"not to create a plan for future school provision"* but to support the preparation of the local plan and, *"Specifically it*

assists in identifying whether new or expanded schools are likely to be needed to accommodate the new housing proposed in the plan over the plan period."

- 3.8 The Topic Paper explains how pupil forecasts are derived for each school, and what the results show for the MIGRATION + HOUSING scenario – including the implications of the proposed housing allocations. In summarising the results the Topic Paper cautions that there are a number of factors that will influence the accuracy of the predictions produced by the model.
- 3.9 For secondary, the model includes the planned expansion of Avon Valley School (in 2027 and 2031) and the new South West Rugby School (opening in 2035). Even so, the model predicts a shortfall of almost two forms places of entry at the end of the plan period, even after the additional capacity has been provided, indicating the need for more capacity – in effect reliance on the other potential expansions mentioned in paragraph 3.6 above. The modelling also suggests shortfalls will emerge earlier than may have been previously expected, meaning that it appears the timing of additional capacity will need to be brought forward.
- 3.10 For primary, the overall borough-wide position is that a significant surplus of places is expected throughout the plan period. These may present viability challenges for keeping under-subscribed schools open. However, within that overall outcome, there are four primary planning areas where shortfalls are forecast. One of these is addressed by existing plans for expansion and additional provision at Houlton.
- 3.11 For the other areas (Rugby Rural, The Revel and Wolvey and Bulkington) the Topic Paper explains some of the factors that lead to the modelling results and that some shortfalls may be overstated due to factors such as not all children attending their local schools.
- 3.12 It is understood that RBC's 'dispersal strategy' has had considerable regard to trying to allocate development to areas where there is available primary school capacity. This would be beneficial to those primary schools that might otherwise lack viability – albeit the Topic Paper does not present such information. The direction of development to areas where the schools have limited spare capacity is less useful, however - and risks creating additional pressure, as recognised in the Topic Paper.
- 3.13 The Topic Paper does not consider, and there is no evidence that any consideration has been given to, travel to secondary schools. Based on the findings of the Topic Paper, especially as it identifies the need for additional secondary provision towards the end of the plan period, this is somewhat surprising.
- 3.14 EFM's May 2025 report highlighted the likelihood that children living in villages would require transport to secondary schools, rather than being able to walk or cycle due to the nature of the transport routes involved – even if within a 3 mile walking distance.

4 Conclusions

- 4.1 In response to the 2025 Preferred Options consultation, EFM's report on education in support of the allocation of Lodge Farm set out a number of advantages that would follow from having a substantial allocation at Lodge Farm. These included, a clear opportunity to justify and deliver social infrastructure (including early years and primary capacity on-site at an early stage), with predictability in timing and simplicity in the control of infrastructure delivery when compared to allocating multiple smaller sites. In addition there is the opportunity to support the proposed new secondary school at South West Rugby in the early stages, whilst also offering flexibility to deliver further secondary capacity at Lodge Farm when it is needed.
- 4.2 RBC's response via the Proposed Submission Local Plan, does not acknowledge these benefits and continues to propose a 'dispersal strategy' for new housing.
- 4.3 The Proposed Submission Local Plan evidence base includes an Infrastructure Delivery Schedule. This provides little detail, other than about already established projects. The potential need for other education provision is identified only in general terms, without any indication of locations.
- 4.4 In terms of additional secondary education provision it is stated that WCC has indicated it would be "*technically feasible*" to expand up to three secondary schools by an additional form of entry. Reliance on this approach leaves considerable uncertainty about the deliverability of additional secondary school places.
- 4.5 It remains the case that Lodge Farm could provide a number of benefits, including support to early delivery of the planned new secondary school at South West Rugby, and a large site for a secondary school. This would provide flexibility for further secondary education capacity to be provided when required. Furthermore, it would obviate the need to rely on the possibility of expansion of existing schools which – while "*technically feasible*" - may prove very expensive and/or problematic in practice, and would do nothing towards the longer term nor towards improving the distribution of secondary schools in the borough.

Jan Kinsman

Educational Facilities Management Partnership Limited

Miller Homes

Lodge Farm, Rugby

SLR Project No.: 407.064532.00001

9 March 2026

Revision: 1

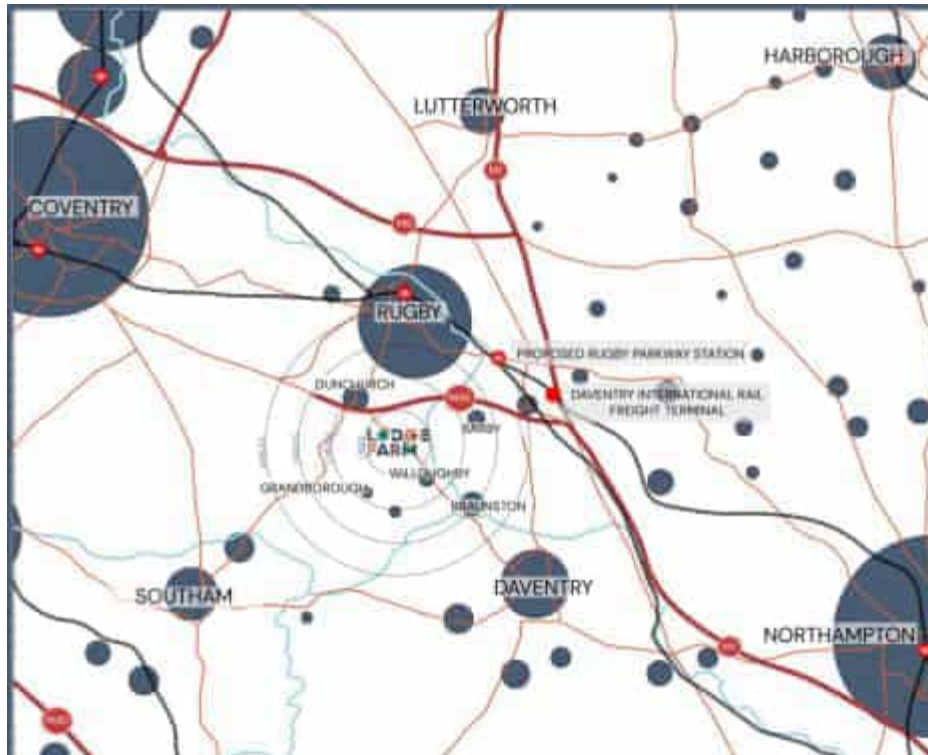
RE RUGBY LOCAL PLAN 2025-2042 - REGULATION 19 - TRANSPORT/MOBILITY REPRESENTATION

1.0 Introduction

- 1.1 SLR Consulting Limited is engaged by Miller Homes to provide Transport and Mobility advice for a new settlement known as Lodge Farm, located within Rugby.
- 1.2 The proposal at Lodge Farm (256ha) is a for up to 2680 homes, community, health, and employment uses, public open space and education – 2FE Primary schools and a secondary school. The location of the site is shown in **Figure 1.1**.

Figure 1.1 – Location of Lodge Farm Rugby





- 1.3 As part of its statutory Local Plan process, Rugby Borough Council (the Council) published its Regulation 19 on 6th January 2026 setting out proposals for its Local Plan 2025-2042¹.
- 1.4 Within the accompanying report and specifically from page 24 onwards, it sets out why the Council have decided to omit this site at Lodge from the Local Plan. From a transport and highways perspective, the reasons given are set out in paragraphs 12.12 to 12.16 and primarily, these can be summarised as follows:
- Sustainability
 - No clear proposals how traffic impacts at Dunchurch and southern Rugby can be mitigated
 - Severance created by the A45.
- 1.5 This Technical Note seeks to address these concerns.

¹ [71fbaec1-180b-9e4a-9579-b221a6001060](#)



2.0 Sustainability

- 2.1 There is an inference within the Council's Regulation 19 submission for Lodge Farm being remote with reference to the previous Local Plan 2019 Inspector's view at that time. It is however important to note that the current proposals for Lodge Farm are materially different to those before the Inspector previously and consequently, any previous views should be given limited weight.
- 2.2 The scale of the site has increased from 1500 homes to 2680 homes and by virtue of the significant package of transport / mobility measures proposed (£10 million) and the design of the site itself to account for a wide range of land uses for day-to-day living including schools, it has been designed to maximise placemaking objectives and complies with contemporary transport policy.
- 2.3 Our view is that the critical mass and Placemaking proposed on a scale such as this is critical to delivering the sustainable infrastructure required to support large scale housing growth within a Local Plan in a Vision Led Planning system.
- 2.4 The key components of a Vision Led Planning system as defined in National Planning Policy Framework (NPPF) Feb 2025 are as follows;
- Plans should be prepared with the objective of contributing to the achievement of sustainable development
 - Planning policies should aim to achieve healthy, inclusive and safe places which;
 - Promote social interaction through mixed use developments, strong neighbourhood centres, walkable/ cyclable neighbourhoods
 - Enable and support healthy lives through the provision of safe / accessible green infrastructure, sports facilities, local shops and layouts encouraging walking and cycling
 - A vision led approach to transport and mobility should be taken to ensure that significant development should be focused on locations which can be made sustainable through limiting the need to travel and offering genuine choice of transport modes which in turn will reduce congestion and emissions and improve air quality and public health.
- 2.5 In order to meet the key facets enshrined within the NPPF, forward planned housing sites need to be of a scale to be able to deliver this step change in sustainable Placemaking. Lodge Farm, at this scale, has the ability to do this.
- 2.6 One of the key reasons Lodge Farm is integral to the Council's climate change goals is its scale and critical mass. Unlike the smaller alternative sites within the draft LDP, its design and range of amenities enable a reduction in car dependency through internalisation by promoting accessibility on foot or by bicycle. Moreover, the scale creates an opportunity to implement large scale sustainable mobility initiatives which smaller sites cannot achieve. Importantly, the benefits of significant investment in sustainable mobility will filter through to users outside of Lodge Farm itself.



3.0 Mitigation of traffic from Lodge Farm

- 3.1 In order to determine the suitability of sites coming forward and the necessary infrastructure required to support these within its emerging Local Plan, the Council have prepared a Strategic Transport Assessment (STA). This STA is underpinned with a detailed microsimulation traffic model.
- 3.2 Whilst microsimulation modelling provides a significantly more accurate representation of forecast traffic demand / growth on the local and strategic highway network compared to a strategic traffic model, the Council's approach to traffic forecasting in its analysis of Local Plan sites uses is a high level, uniform approach to understanding the traffic effects.
- 3.3 Models such as this are used to understand the infrastructure requirements to deliver Local Plans on the basis of unfettered traffic forecasts and traffic growth linked to 'business as usual' rather than a vision led approach as per contemporary policy enshrined in NPPF. Unsurprisingly, the results of such traffic modelling used to underpin a Local Plan such as this are predicated on delivering highway capacity through large scale junction improvements, or new, car based infrastructure such as link roads/ bypasses.
- 3.4 For example, within the previous representations we know that there has been a 9% reduction in traffic within Rugby between 2011-2023 and a 15% reduction in traffic between 2013 and 2023
- 3.5 This is important as it illustrates that there is less traffic within Rugby than there was more than 10 years ago despite many developments occurring within the town. This data demonstrates that the highway network is therefore less congested than more than 10 years ago dispelling the Predict and Provide approach to development that traffic growth should occur exponentially over a period of time and that development (such as the that proposed at Lodge Farm) cannot come forward due to traffic congestion concerns.
- 3.6 A key flaw within the STA is that each Local Plan site is treated equally in terms of its trip making characteristics derived from TRICS during peak periods, irrespective of the mix of uses on the site, or any sustainability measures proposed.
- 3.7 We do however understand the limitations of the traffic Council's model in this regard especially as the precise details of candidate sites such as exact mix of uses, sustainable transport proposals, levels of internalisation etc and hence traffic forecasts may not be available. In reality, each site will be unique depending on all of these factors, however for large sites such as Lodge Farm, understanding the composition of the site is important.
- 3.8 For example, the Council's traffic model takes no account of the vision led approach as detailed in the previous representations, whereby forecast traffic from Lodge Farm by virtue of the placemaking and sustainable mobility proposals, are forecast to be 60% lower than the TRICS forecasts. The Council's assessment of Lodge Farm as an omission site includes no modal shift or vision led approach beyond its core model scenarios. The Council's assessment of the suitability of Lodge Farm is therefore predicated on traffic forecasts which have no bearing on what is proposed.



- 3.9 As a result of these limitations within the STA, Miller Homes would like to review the outputs from the model for Lodge Farm in detail and wish to use the model test the vision led approach as set out in the previous Transport Representations (6th May 2025) **APPENDIX A** for this site.
- 3.10 Therefore and without further, detailed modelling it is not correct to omit Lodge Farm from the Local Plan on the basis of it needing to deliver significant large scale junction improvements such as upgrades (£61 million) to A45/M45 Thurlaston interchange, banning right turns at Dunchurch Crossroads (despite the work at **Appendix A** showing a reduction in traffic at this location – 2000 less daily trips 2018-2024 without the Homestead Link Road (HLR)) and further widening of the A5/A428. All of these highway schemes are conceived to improve the free flow of traffic during peak periods and are based on a fundamental misunderstanding on how this site can be delivered in a policy compliant manner within a vision led planning system.



4.0 Severance created by the A45

- 4.1 The masterplan at Lodge Farm proposes to provide multiple forms of land uses on either side of the A45 and to change the character of the A45 at this location to ensure that development on either side of the road is well connected in the interests of placemaking.
- 4.2 Officer position is that the new settlement at Lodge Farm would be bisected by the A45 and hence would be undesirable, undermining the economic function of the A45 – part of the Major Route Network. No detail is provided to the economic function point/
- 4.3 The suggestion put forward by the Council as an alternative would be to divert the A45 around the fringe of the development and the Council's highway officers have volunteered that this diversion will cost in the order of £30million. This option is not considered to be appropriate, or to represent good value. More importantly, the environmental and carbon consequences of relocating the A45 to one edge of the proposed site would be significant, unnecessary and contrary to the Council's climate change emergency / objectives².
- 4.4 There is no dispute that the A45 is an important route, however the Council's opinion on this is clearly entrenched in a position whereby the function of traffic and in this case economic function, is the most important aspect of plan making / placemaking.
- 4.5 Officers state that the proposal is to create 20mph speed limits, traffic calming and frequent junctions. Reference is made to examples whereby traffic has been removed from settlements such as the A5 at Daventry with a bypass. It is important to note that in the context of the Daventry bypass, Daventry is a town of some 30,000 inhabitants and is clearly not of the same scale as the proposal, hence this is not considered to be a valid comparison.
- 4.6 Moreover, the proposed change in character of the A45 would occur over the site frontage of some 1.5km only which if travelling at 30mph instead of the posted 50mph speed limit would mean a delay of only 45 seconds. At 1km the delay would be 30 seconds due to reduced traffic speeds. This is not considered to be significant and reducing the speeds of vehicles travelling on a straight section of road such as this should enhance highway safety. Speed reductions would be managed by gateway features which are not uncommon on roads of this nature together and any proposal would be underpinned with a Road Safety Audit.
- 4.7 It is likely that there would be two new signal controlled junctions created from the A45 to access the site which is entirely normal for a development of this scale and there is no evidence to suggest from the Council that any of this would severely detract from the economic function of the A45. Indeed, timings of the signals would normally be designed to reflect and prioritise the throughflow of traffic on the A45.

² <https://www.rugbynetzero.co.uk/>



APPENDIX A – May 2025 Transport Representations



St Modwen Homes

Lodge Farm, Rugby

SLR Project No.: 407.064532.00001

6 May 2025

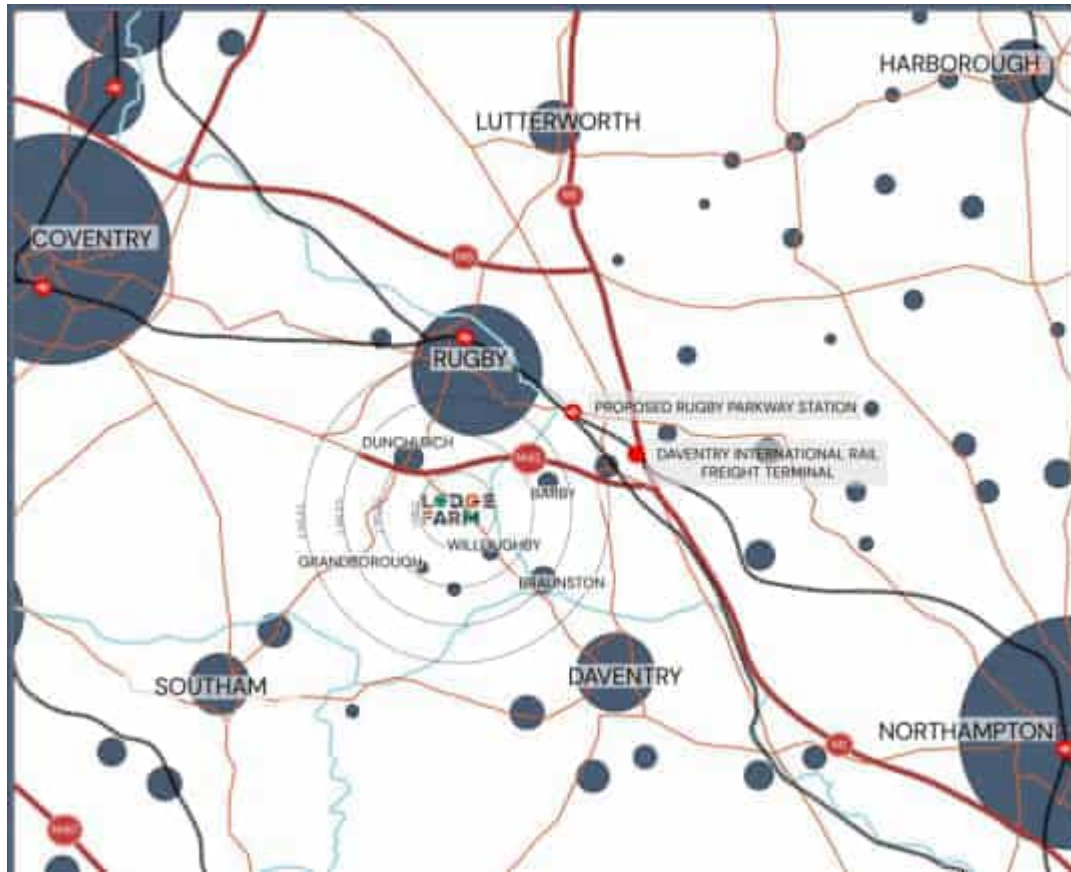
Revision: 1

RE PREFERRED OPTIONS CONSULTATION – TRANSPORT/MOBILITY REPRESENTATION

1.0 Introduction

- 1.1 SLR Consulting Limited is engaged by St Modwen Homes to provide an overview of the Transport and Mobility Strategy for a new settlement known as Lodge Farm, located within Rugby, in order to support representations to the emerging Local Plan.
- 1.2 The proposal at Lodge Farm (256ha) is a for up to 2680 homes, community, health, and employment uses, public open space and education – 2FE Primary schools and a secondary school. The location of the site is shown in **Figure 1.1**.
- 1.3 These Transport / Mobility representations are intended to provide a broad overview of why large scale, residential led- mixed use development at Lodge Farm should be considered as a strategic site within the forth coming Rugby Local Plan. The proposals are for up to 2680 homes, community, health and employment uses, public open space and education- 2FE Primary schools and a secondary school.
- 1.4 These representations are also intended to demonstrate why previous concerns about development on this site are no longer reasons to dismiss this site for a new settlement proposal, particularly in the context of contemporary UK national planning policy.

Figure 1.1 – Location of Lodge Farm Rugby



- 1.5 Our view is that the critical mass and Placemaking proposed on a scale such as this is critical to delivering the infrastructure required to support large scale housing growth within a Local Plan in a Vision Led Planning system.
- 1.6 The key components of a Vision Led Planning system as defined in National Planning Policy Framework (NPPF) December 2024 are as follows;
- Plans should be prepared with the objective of contributing to the achievement of sustainable development
 - Planning policies should aim to achieve healthy, inclusive and safe places which;
 - ~ Promote social interaction through mixed use developments, strong neighbourhood centres, walkable/ cyclable neighbourhoods
 - ~ Enable and support healthy lives through the provision of safe / accessible green infrastructure, sports facilities, local shops and layouts encouraging walking and cycling
 - A vision led approach to transport and mobility should be taken to ensure that significant development should be focused on locations which can be made sustainable through limiting the need to travel and offering genuine choice of transport modes which in turn will reduce congestion and emissions, and improve air quality and public health.



- 1.7 In order to meets the key facets enshrined within the NPPF, forward planned housing sites need to be of a scale to be able to deliver this step change in sustainable Placemaking. Lodge Farm has the ability to do this.
- 1.8 In addition to complying with national policy, the Transport and Mobility Strategy for this site will comprehensively align with the Council's Climate Change Emergency (November 2022) and agenda i.e., reaching Net Zero by 2030.
- 1.9 The remainder of these representations provide an overview of why Lodge Farm should be considered for inclusion within the Local Plan;
- Background
 - The Transport and Mobility Strategy
 - Response to anticipated concerns
 - ~ Potential for significant trip generation on the network / heavy reliance on the car
 - ~ Traffic effect at Dunchurch Crossroads
 - ~ Feasibility of proposed public transport provision
 - ~ Active travel accessibility
 - ~ Proposals for safe pedestrian / cycle crossing of the A45.
 - Summary and Conclusion.



2.0 Background

Travel Behaviour

- 2.1 There is demonstrable evidence to show that modern attitudes towards travel and the intergenerational effect / attitudes towards movement / environment are changing rapidly and policy is seeking to keep abreast of these. The recent changes in the NPPF are reflected of this ongoing change.
- 2.2 It is important to recognise that travel habits have changed significantly over the last few decades. This has been the result of many factors, including: the evolution in governmental policy and funding priorities; new technologies; flexible and remote working policies; the Covid-19 pandemic; online shopping; integrated land-use planning; and the changing values of younger generations. These factors should be considered when forecasting trip generation for new developments.
- 2.3 Analysis of National Transport Statistics (NTS) data shows there has been a gradual decline in the number of car driver and passenger trips per person since 2002 with a sharp decline in 2020 due to the pandemic before partially bouncing back. Overall car driver and passenger trips in 2023 were over 15% lower than levels seen in 2002 in the UK.
- 2.4 Hybrid working has become the norm in many sectors. Data from the Office of National Statistics (ONS) Opinions and Lifestyle survey shows that Working from Home (WfH) rates have stabilised in the past 15 months with around 25% of people working remotely at any one time of the week. This has not only reduced the number of trips but also smoothed or elongated the peak hours as some trips can be made outside peak hours.
- 2.5 With strong policy support within the NPPF, the significance of traffic congestion in transport planning has measurably diminished.

Change in Observed traffic flow for Rugby 2011-2023

- 2.6 Analysis has been undertaken to assess the observed change in traffic in Rugby between 2011 and 2023. For the assessment, observed traffic was obtained from The Department for Transport GB Road Traffic Counts¹. This is available for over 23,000 locations across the country. Each count location provides the observed AADF (Annual Average Daily Flow) by vehicle type.
- 2.7 For the Town of Rugby and the census, a set of Middle Layer Super Output Area (MSOAs) has been identified that reflects the area of the town and its immediate surroundings as shown in **Figure 2.1**. The observed counts points that sit within these MSOAs and are then identified as shown in **Figure 2.2**.

¹ [GB Road Traffic Counts - data.gov.uk](https://data.gov.uk)



Figure 2.1 – MSOA's representing Rugby Town area

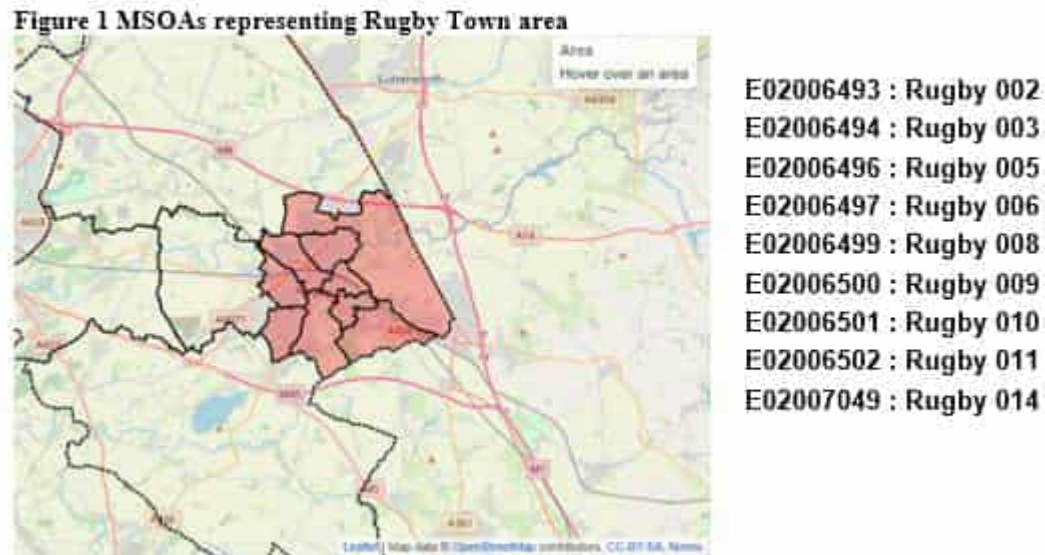


Figure 2.2 – location of observed traffic count points within Rugby Town Area



- 2.8 The data is collected from 2011 up to 2023 (the most recent year data is available) to give observed traffic growth factors for each year up to 2023 relative to a 2011 base year.
- 2.9 The total traffic (car and taxi) counts from the 7 count points within Rugby were obtained for each year between 2011 and 2023 and observed traffic growth factors were derived relative to a 2011 base year. These are presented in **Table 2.1**.



Table 2.1 Observed Traffic counts for Rugby Town area

Count Pt	MSOA	ID	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
07168	E02006500	1	14105	13885	13762	14136	14416	14641	12526	12388	12543	9528	10497	11212	11422
57581	E02006499	2	11191	11018	10919	11215	11457	12009	11921	11789	11937	9067	9990	10670	10870
77450	E02006501	3	5114	4671	4679	4947	4889	4949	5357	5332	5343	3902	4267	4580	4693
77481	E02006497	4	10068	9911	9823	10090	10290	10450	10370	10299	10463	7948	8756	9382	9828
81419	E02006494	5	20771	14258	14067	14412	14847	15231	15480	15406	15440	11275	14159	15197	15573
81420	E02006493	6	19730	23277	23148	22906	22484	22835	31831	31680	32008	23812	28379	30460	31598
81421	E02006494	7	20792	23199	23067	22828	22409	22759	22591	19225	19466	14786	16290	19419	19784
TOTAL			101771	100517	99682	100533	100772	102674	110079	106079	107800	80318	92338	100890	103468
Traffic Growth Relative to 2011			1.00	0.99	0.98	0.99	0.99	1.01	1.08	1.04	1.06	0.79	0.91	0.99	1.02

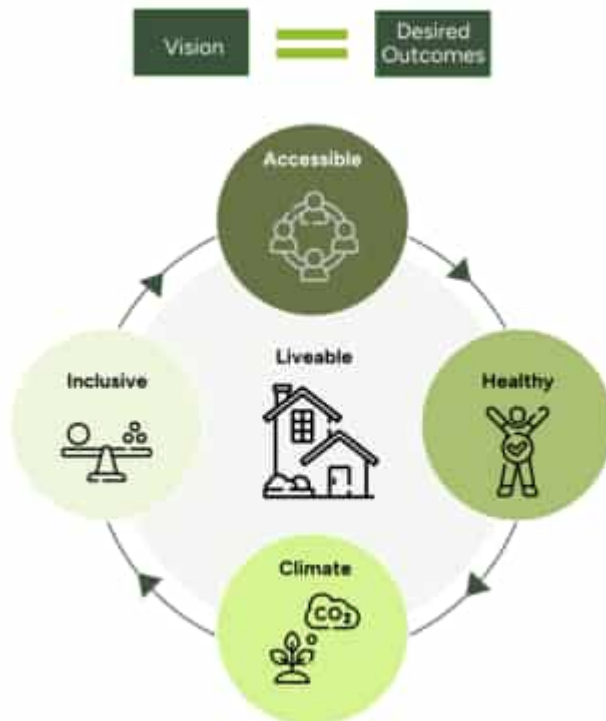
- 2.10 The data in Table 2.1 shows that there has been a 9% reduction in traffic within Rugby between 2011-2023.
- 2.11 This is important as it illustrates that there is less traffic within Rugby than there was more than 10 years ago despite many developments occurring within the town. This data demonstrates that the highway network is therefore less congested than more than 10 years ago dispelling the Predict and Provide approach to development that traffic growth should occur exponentially over a periods of time and that development (such as the that proposed at Lodge Farm) cannot come forward due to traffic congestion concerns.
- 2.12 The data also supports a Vision led approach to planning and development as set out within the NPPF.



3.0 The Transport and Mobility Strategy

Vision and Validate

- 3.1 Vision-led Planning is a method which sets the desired outcomes of a new development, then identifies placemaking and mobility interventions to realise those outcomes.



- 3.2 This is opposed to predicting future demand to provide capacity (often known as Predict and Provide).
- 3.3 The objective is to deliver well-designed, sustainable and popular places. This approach is a requirement of the NPPF which was revised on 12 December 2024 following a consultation process.
- 3.4 Vision-led planning starts with an understanding of tolerance to traffic and something which the planning and development industry in the UK has struggled to grasp over the past +30 years.
- 3.5 In order to create thriving, sustainable places we must recognise that traffic and congestion is secondary to Place and the broader objectives of a development, and that the volume of traffic is a function of available road space i.e. if we design for traffic we shall have more traffic and new communities won't be as successful as the best practice cases we have studied in the UK and across continental Europe.
- 3.6 There is an opportunity in Rugby and at Lodge Farm to reverse previous trends in designing places and new communities. Current national policy enshrined in the NPPF now supports



this approach and hence we must be bold. Through shifting the emphasis away from designing places for a 'worst case' peak hour scenario, we can realise the full potential of the development.

- 3.7 The Transport and Mobility Strategy demonstrates why this is such a good site for a new settlement proposal from a mobility perspective whilst recognising that we are starting from undeveloped land with existing low levels of sustainable mobility. The Transport and Mobility Strategy starts with reducing the need to travel, then ensuring Active Travel is prioritised whilst providing gold plated shared mobility as an alternative viable option instead of simply jumping in the car.
- 3.8 One of the key reasons Lodge Farm is integral to the Council's climate change goals is its scale and critical mass. Unlike smaller alternative sites, its design and range of amenities enable a reduction in car dependency by promoting accessibility on foot or by bicycle. This strategic centred around **liveability** approach makes sustainable living more achievable within the development whilst achieving the much needed housing demand for the region for 2031 and beyond.

Reducing the Need to Travel

- 3.9 The illustrative masterplan (**Figure 3.1**) demonstrates the ability to create a place at Lodge Farm which is:
- Climate driven
 - Healthy
 - Accessible
 - Inclusive
- 3.10 The Placemaking interventions of the Masterplan provide the freedom to fulfil many daily activities from within the community itself either physically or remotely. This is made possible by bringing more trips within a short walking distance through the provision of amenities that enable local living such as schools (2* Primary and secondary), shops, healthcare, leisure, community and employment uses.
- 3.11 NTS data reveals that when trip distances can be brought to within a mile, the typically 65-75% of these are walked. Under ½ mile, over 80% of trips are walked for all purposes illustrating the principle of 'proximity' and highlighting the importance of providing sufficient critical mass as proposed at Lodge Farm to support these facilities and amenities within the site.



Figure 3.1 – Illustrative Masterplan



- 3.12 The current iteration of the illustrative Masterplan sets out a greater critical mass of development on the site than previously proposed within the Local Plan, importantly showing development on both sides of the A45.
- 3.13 The point of Active Travel connections between both sides of the site and treatment, character and crossing of the A45 will be an important element of detail and any future information submitted in support of this site will need to detail how this interface with the A45 (and its change in nature) will work in practice.
- 3.14 The development is now proposing some 2,680 homes, a secondary school, two 2 FE Primary schools, a mixed innovation quarter, neighbourhood hub and garden village centre.
- 3.15 Whilst traffic capacity will still need to be addressed in detail at the planning application stage, the greater critical mass as now proposed, creates significantly enhanced Placemaking opportunities and more opportunity for local living and local trips to be kept internal within the site.
- 3.16 Within the updated illustrative Masterplan, consideration has been given to the delivery of specific village uses within the site; local convenience store, GP and dentist surgeries, fitness facilities which are all important component parts in terms of local living and creating places where the need to travel externally for day-to-day activities can be reduced.



- 3.17 The greater critical mass in relation to housing numbers also enables funding for the transport proposals / public transport provision set out in the following to be further enhanced.
- 3.18 The associated benefits of the illustrative Masterplan will be a reduction in private vehicle movements, promotion of Active Travel, improvements in physical and mental health, enhanced road safety, mitigation of carbon emissions and the creation of a vibrant community and local businesses.
- 3.19 The placemaking components proposed have a greater potential to realise a vision's desired outcomes than those of mobility. Core placemaking interventions also include: safe and attractive street design with green spaces welcoming pedestrians, cyclists, wheelchair users and pushchairs; provision of local retail, leisure, education, employment, and shared community facilities; and community concierge and co-working spaces. All of this can be achieved at Lodge Farm.
- 3.20 Within a development of the scale as proposed at Lodge Farm, multiple local amenity / neighbourhood hubs will be provided to maximise the proportion of residents within acceptable walking distance of most frequent trip destinations. These neighbourhood hubs build a focal point for local living and community cohesion and inclusion.

Promoting Active Travel Mobility

Pedestrian Access

- 3.21 The development would provide pedestrian connections to the existing footways on the A45, allowing access on foot to Dunchurch some 2.3km from the edge of the site.
- 3.22 A comprehensive network of pedestrian routes will be provided within the site to enable access to local facilities including the proposed primary schools and local centre.
- 3.23 The mobility network at Lodge Farm will be based around Active Travel corridors for walking and cycling which offer the most direct routes. These will connect with mobility hubs providing access to on demand and public transport services, and be a suitable level of cycle parking and storage facilities.





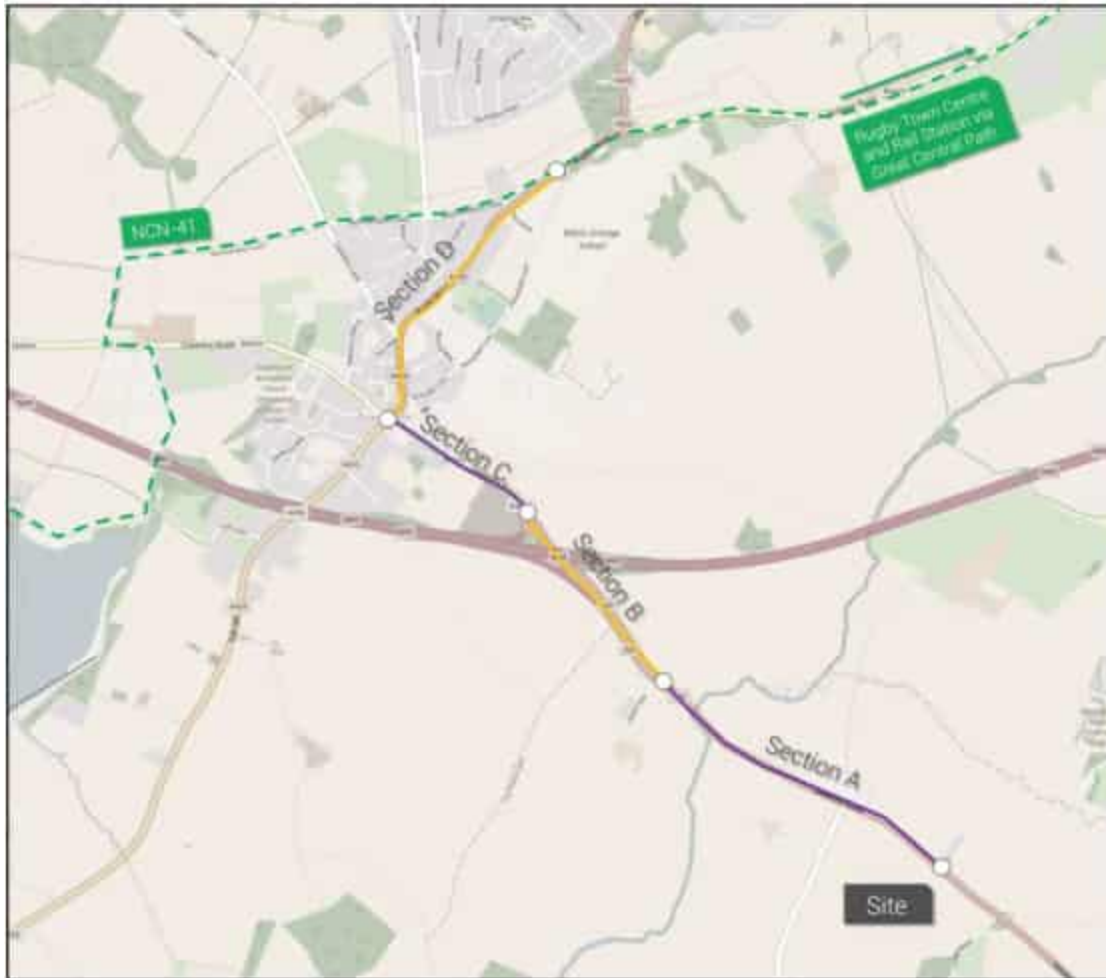
- 3.24 In relation to internal connectivity, new access junctions and downgrading of the character and speed of the A45 local to this site will provide the opportunity to ensure that at grade pedestrian/cycle crossings are of human scale. The methods relating to speed reduction in increments from 50-30mph, gateway signage and junction form are set out later within this report.

Cycle Access

- 3.25 The key destinations for cycling would be Dunchurch (approximately 3km or a 12-minute cycle) and Rugby (approximately 7km or a 25-minute cycle). To enable cycling to be a safe and attractive mode choice, the developer would fund a cycle route between the site and existing cycle facilities in Dunchurch. Within the development, a network of cycle routes will enable short journeys to the primary school and local centre facilities.
- 3.26 In addition, the provision of Ebikes (Brompton or similar) will make journeys to Dunchurch / Rugby more accessible for less proficient cyclists or those who find distance/topography challenging.
- 3.27 High level proposals were set out (by PJA and reproduced here) in previous representations to the Local Plan to fund a new cycle route between the site and Dunchurch and the existing cycle facilities/infrastructure in Dunchurch which would then tie into Rugby town centre and railway station via NCN Route 41. This proposed cycle route between the site and Dunchurch with the scheme is split into four sections as illustrated in **Figure 3.2** and in **Appendix A**.
- Section A: A45 – single carriageway section from site access to start of dual carriageway / M45 slip road;
 - Section B: A45 – dual carriageway section until M45 / B4429 roundabout;
 - Section C: B4429 Daventry Road to Dunchurch Crossroads; and
 - Section D: A426 Rugby Road to National Cycle Route 41.



Figure 3.2 – Potential Cycling Infrastructure Improvements



Section A – A45 Single Carriageway

Context

- 3.28 A narrow footway is already provided on the south-western side of the carriageway. Where the A45 passes over a watercourse (Rainsbrook), a barrier is in place to protect the bridge. The road is subject to a 50mph speed limit, and the opposing carriageways are separated by an area of central hatching.

Proposal

- 3.29 The existing footway would be widened within the verge to provide a shared footway / cycleway. It may be appropriate to relocate the central hatching to the side of the road to provide a buffer between the footway / cycleway and oncoming traffic.
- 3.30 The location of the barrier will be reviewed to ensure a suitable footway / cycleway width can be provided as far as practicable.



Section B – A45 Dual Carriageway

Context

- 3.31 At this point the road widens to become a dual carriageway subject to the national speed limit. In the northbound direction, a slip road diverges to the M45 westbound. A narrow footway is provided on the south-western side of the carriageway, terminating at the field entrance at the start of the slip road.
- 3.32 There is a wide central reservation separating the north and southbound carriageway, although the available width narrows to accommodate a bridge pier supporting the M45 overhead.
- 3.33 At the northern end of this section the A45 terminates at a roundabout with the M45 eastbound off-slip and B4429. Both the A45 and B4429 entry/exit arms are dual carriageway (with a wide central reservation), the M45 is an entry arm only.

Proposal

- 3.34 An uncontrolled crossing point would be provided to the central reservation, south of the slip road. A cycleway would then be provided along the central reservation until the A45 / M45 / B4429 roundabout.
- 3.35 The cycle route would run adjacent to the northbound carriageway beneath the M45 alongside the bridge pier.
- 3.36 Crossing points would then be provided around all arms of the roundabout.

Section C – M45 to Dunchurch

Context

- 3.37 A short distance north of the M45, the road returns to a single carriageway, narrowed by hatching either side of a central reservation. The speed limit is 40mph.
- 3.38 Upon the entrance to Dunchurch village, the road narrows through removal of the central reservation and hatching, and the speed limit reduces to 30mph.
- 3.39 The route continues to the 'Dunchurch Crossroads' junction of the B4429 and A426. This is a four-arm signalised junction, for which an improvement scheme is proposed to provide additional space on the A426 Rugby Road (North) arm.

Proposal



- 3.40 From the A45 / M45 roundabout, nearside cycle lanes would be provided in both directions, accommodated by removing the central hatching.
- 3.41 At the entrance to the village, a gateway feature would be provided to reinforce low traffic speeds and provide a measure for cyclists to re-enter the main carriageway from the cycle lanes.
- 3.42 Through the village the restrained street layout and lower speed limit provides an appropriate environment for cyclists to mix with vehicular traffic.
- 3.43 At the Dunchurch Crossroads, a high proportion of vehicular and cycle traffic to and from B4429 Daventry Road would turn north to A426 Rugby Road, as the most direct route towards Rugby.
- 3.44 Although this is a busy and constrained junction, confident cyclists would assume a right turn position on B4429 Daventry Road, giving way to oncoming vehicles.
- 3.45 It is acknowledged that this junction has several conflicting movements (although traffic will be removed as part of the Dunchurch bypass) and less confident cyclists may therefore prefer to adopt an alternative approach to turning right. An acceptable solution for cycle traffic would be a two-stage right turn, which is a technique recommended by the London Cycle Design standards. This could be accommodated by routing straight over the junction, turning left into School Street, and then left onto Southam Street (The U turn) to travel north on the A426 across the junction. This arrangement allows cyclists to remain on the nearside of vehicles without having to weave or give way within the junction.

Section D – A426 Rugby Road

Context

- 3.46 To the north of the Dunchurch Crossroads, the A426 provides an off-carriageway shared footway / cycleway on the eastern side of the road to Rugby.

Proposals

- 3.47 This route is considered to be satisfactory. This section would be reviewed as part of improvement to the other sections outlined, although it is unlikely that any further improvements would be required



Providing shared and public mobility services

- 3.48 Lodge Farm will limit private car journeys for on and off-site movement by offering a genuine range of shared, on-demand and low carbon alternatives for residents, workers, and visitors. This shared mobility will be considered like other infrastructure (schools, roads), such that it will be in place before the first dwelling is occupied ensuring that shared mobility behaviour from the outset. The aim is to make sustainable mobility behaviour the natural first choice for as many journey types as possible. Core interventions include:
- 3.49 A network of Mobility Hubs (located at neighbourhood hubs) providing organised access to public transport, micro-mobility and other shared mobility services, including electric vehicle (EV) car clubs;
- 3.50 The development will provide via a Section 106 Agreement:
- Several Mobility Hubs within the site
 - An EV car club encouraging low car ownership across the site (est. cost **£1million**)
 - Brompton E-bikes to compliment routes proposed and for those potential users who could be dissuaded by distance or topography. Ebikes have the ability to appeal to non cyclists or cyclists who are limited by distance and topography and hence make the site more accessible to amenities outside of its boundary (est. cost - **£1million**)
 - Personalised travel planning for all residents / occupiers of the site and the adjacent communities (intended for extra benefit from adjacent communities) will be undertaken to reduce the need to travel where possible and for journeys to be made by active travel or sustainable modes of transport (est. cost - **£500,000**)
 - Financial incentives to travel more sustainably – bike voucher, bus pass etc will be provided within a comprehensive Travel Plan for this site and a Travel plan Coordinator and monitoring fee will be provided to ensure that the Council can measure the success of the Travel Plan. In addition, a fighting fund of **£500,000** will be bonded to the Council to assist with meeting modal share targets set out in the Travel Plan.

Improvements to the Bus network

- 3.51 There is the option to deliver a new 'gold star' bus service on the A45 between Daventry, the site and Rugby with a 30 min frequency Mon – Fri and this would comply with draft Policy DS10 i.e. the provision of a direct, high quality public transport link between the site and surrounding villages, Rugby and Daventry. Importantly, the previous representations for this site made it very clear that the development would fund such a service until it became commercially viable – a prerequisite from Stagecoach.
- 3.52 In addition, it is important to understand how advances in public transport can be brought forward by Lodge Farm to compliment fixed service / route bus options. Modern public transport, specifically a Demand Responsive Bus Service (DRT) operating within a 10- 15 km radius of the site, linking with key employment and amenities including rail services at Rugby and future services at Rugby Parkway, Dunchurch, Daventry and providing the existing, neighbouring settlements with a step change in public transport options.





- 3.53 The development at Lodge Farm will support, extend and provide longevity to the Council's existing IndieGo Rugby DRT service by providing **£7million** over 10 years to support a step change in bus provision for future residents of Lodge Farm and the surrounding communities.

Rugby Parkway Train Station

- 3.54 The Council's ambition is to have Rugby Parkway Station open to passengers in 2026, subject to funding and the necessary consents. Given it is now 2025, this seems very ambitious and the future timeframes for a station at this location are likely to coincide with a start on any future development on this site.
- 3.55 The Transport and Mobility Strategy for Lodge Farm now includes the potential benefit of Rugby Parkway Train Station (public consultation Jan-Feb 2023).
- 3.56 At the eastern edge of the site there is access to the Oxford Canal Walk, just south east of Dunchurch Pools Marina. From here the towing path (PRoW) extends northwards towards the proposed Rugby Parkway station some 5km from the site boundary.
- 3.57 There is scope with investment from Lodge Farm to upgrade the surface of this existing path to provide an all-weather surface providing greater benefit to existing users and potential users (on bicycles / Ebikes) from Lodge Farm to connect to the proposed mass transit station at Rugby Parkway.

Accessibility Analysis

- 3.58 Additional analysis has been undertaken to measure the benefit of a strong bus based component of the Transport Strategy and the benefits of doing this are demonstrated within the accessibility modelling using TRACC software. The outputs from this exercise are shown in **Appendix B**. These include base scenarios (AM 0700-1000 & PM 1600-1900) for bus and rail combined accessibility to/from the site and a comparison to show the change in accessibility in these peak periods based on the public transport strategy proposed in the Transport Strategy Report (but extended to include services to Rugby train station) together with a new service to Rugby Parkway station.



3.59 In summary, the TRACC modelling demonstrates the accessibility benefits of a Daventry to Rugby train station bus service;

- Rugby train station and Rugby Parkway stations would be within 20-30 mins of the site by bus;
- Linking the site to both train stations increases accessibility to other areas significantly for example one can travel as far south as Watford within 90 mins and as far north as Tamworth and Wolverhampton in 90 mins.
- Accessibility to the surrounding areas increases significantly with quicker access to Rugby train station, i.e., the West Coast Mainline allows for access to Tile Hile, Berkswell and Hampton-in-Arden and other areas between Coventry and Birmingham.
- The inclusion of Rugby Parkway station increases accessibility to include Northampton, Coventry, Warwick and Birmingham International.

Vision-led Planning Tool

3.60 A Vision led Planning Tool has been developed by SLR and used to appraise the proposals at Lodge Farm. Details of the Tool's Case Study Applications are set out in **Appendix C**.

3.61 The Tool has been used to assess how different combinations of interventions will influence the way people move, drawing on evidence-based data. This informs the masterplan design so that it pursues the set outcomes.



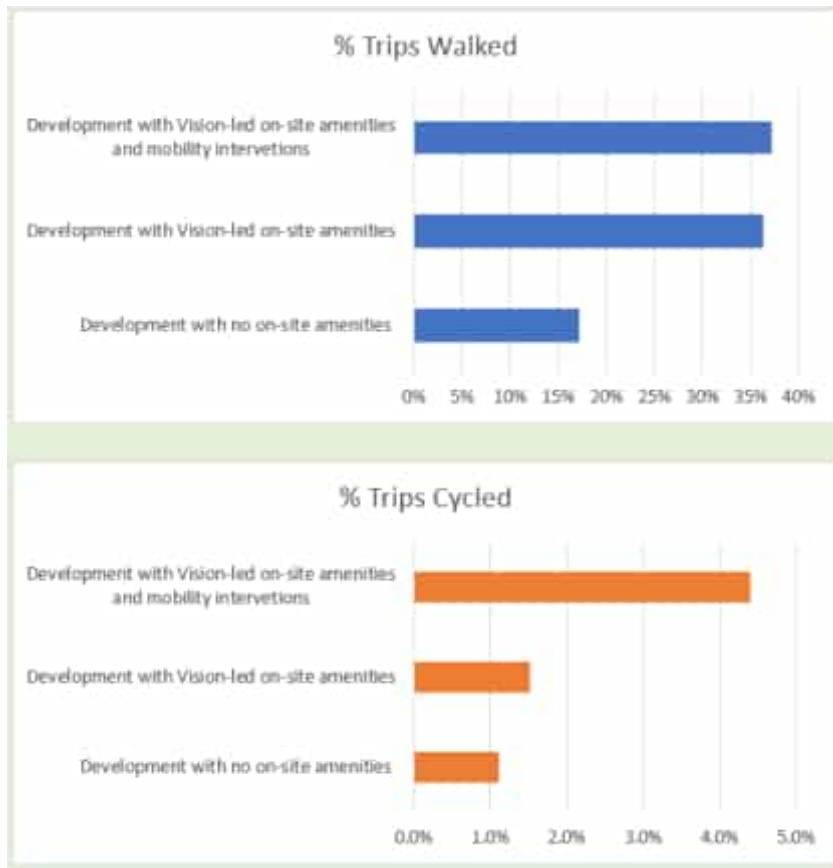
3.62 The Tool utilises existing data and evidence on trip making behaviour and amenity provision to give guidance on:

- The amenities which are likely to be tenable within new developments of different sizes which will help engender local living;
- The proportion of trips - across all journey purposes - that would make use of local amenities thanks to being a short distance away. This includes the modes used and importantly the number of trips made by walking; and



- The impacts of including additional mobility interventions that support low car use for remaining external trips.

Figure 3.3 - Lodge Farm proportion of forecast Active Travel trips based on Transport Strategy



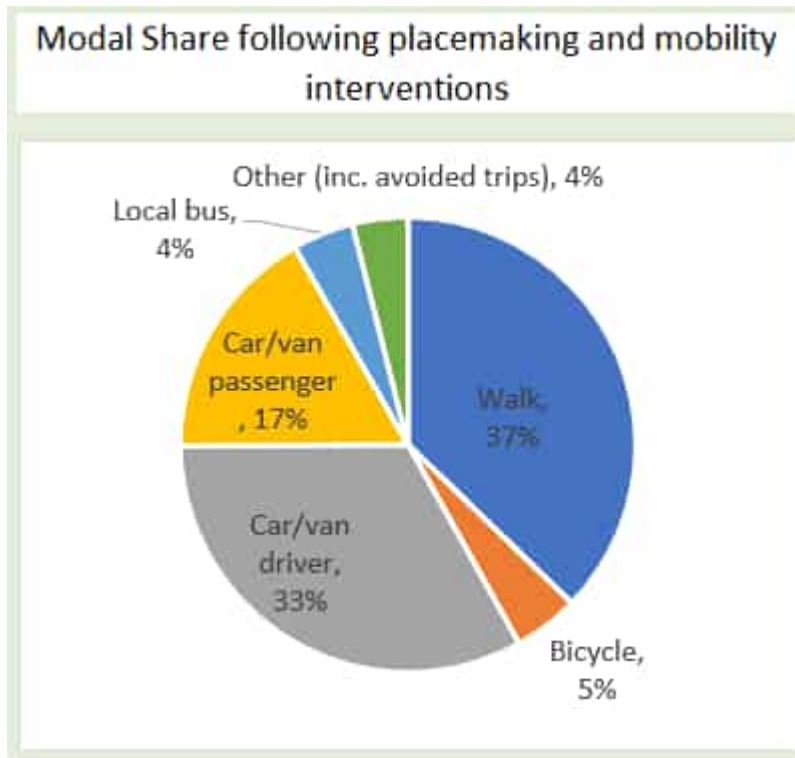
3.63 The Tool allows sensitivity and scenario testing of different masterplan designs such as:

- Including more or fewer amenities in the masterplan design;
- Improving connectivity of the walking network;
- Increase / decrease density of housing;
- Increased PT or cycle mode share for external trips due to mobility solutions contained in the vision;
- Variation in rate of uptake of EVs;
- Changes in future levels of working from; and
- Home and shopping home delivery.



- 3.64 The modal share forecasts for the residents based on the placemaking and mobility interventions are shown in **Figure 3.4**.

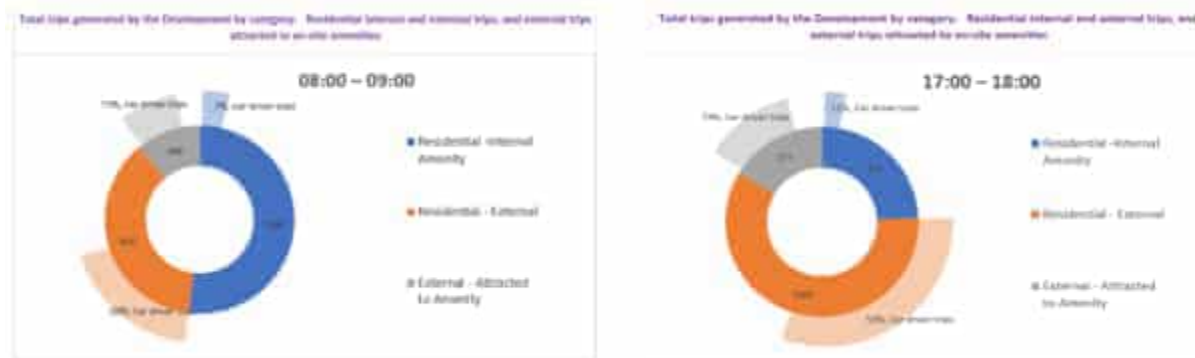
Figure 3.4 Forecast Modal share Lodge Farm



- 3.65 From the scenario testing, the Tool provides a range of quantified impacts on carbon emissions, air quality and physical and mental health including:
- Overall CO2 emissions and change in carbon relative to a selected base year;
 - NOx, PM2.5, PM10 (from exhaust and non-exhaust) emissions resulting from the car trips (taking account of Petrol/Diesel/ Hybrid/ EV mix over time) generated from the site; and
 - Quantified health benefits amongst residents of the new development for 8 conditions, linked to forecast increases in walking and cycling that the site design prompts.
- 3.66 The Vision-led Planning Tool also provides trip generation data (distances and modes by time of day) for residential schemes, taking into account the location, scale, housing mix, and selection of on-site amenity provision and planned mobility interventions. Key outputs include daily, AM and PM peak period, and individual hourly data on:
- Residential internalisation rates by trip purpose and mode of travel;
 - Residential external trip rates by trip purpose and mode of travel; and
 - Trip attraction, by purpose and mode, to on-site amenities from outside the development.



Figure 3.5 – Internal / external trips Lodge Farm



- 3.67 The trip making information derived from the Vision-led Tool shows that during the AM peak 1269 internal trips are made from the residential component of the masterplan with only 7% made by car and 910 external trips with a 50% mode share for car. During the same peak hour 269 trips are attracted to the site (employment, amenities, schools etc) and 71% of these trips are car based. There is a similar pattern in the PM peak.
- 3.68 To demonstrate the suitability of Lodge Farm for a new settlement residential led, mixed use development the traffic forecasts from the Council's Strategic Transport Model have been compared to the outputs from the Vision-led Planning Tool.
- 3.69 The Council's assessment of Lodge Farm within its traffic forecasting/modelling (Stage 2 Assessment and Area wide STA modelling reports) set out that WCC have used predetermined, TRICS based residential vehicle trip rates (Table 11, June 2017 STA Modelling Analysis and Overview) to forecast demand from Lodge Farm.
- AM (0800-0900) – 0.71 trips/dwelling (combined in/out)
 - PM (1700-1800) – 0.666 trips/dwelling (combined in/out)
- 3.70 Based on 2680 homes and excluding any of the other proposed land uses (traffic generators) at Lodge Farm the Council's forecast would be for 1900 new vehicle trips in the AM peak and 1800 new vehicle trips in the PM peak based on a standard TRICS methodology which is unable to account for new settlement proposal as proposed at Lodge Farm.
- 3.71 By contrast and in line with policy objectives as set out within NPPF, the Vision led Tool is forecasting 750 and 800 vehicle trips in the AM /PM peaks respectively for all the land uses proposed at Lodge Farm. This clearly demonstrates the benefits of the critical mass/ mix of uses, placemaking characteristics proposed at Lodge Farm together with the significant investment in mobility/sustainability proposals (as set out in the Transport Strategy) to reduce traffic demand.



CARBON BENEFITS SUMMARY due to changes in car-km

Design Annual Carbon Reduction as a result of planning and mobility interventions – comparison between development without planning and best mobility intervention – comparison between development with planning and best mobility intervention

	Average Annual carbon benefits <i>(kgCO₂e per person per year)</i>		Use of fewer resources to replace the loss of carbon saved CO ₂ e saving when compared to new development without planning and mobility.	CO ₂ e equivalent savings from less pump-and-treat solutions CO ₂ e saving when compared to new developments without planning and mobility.	CO ₂ e equivalent savings from no building at all (single plot)
New Development without planning and mobility intervention	784		Equivalent Power Use (kWh/m²) Development size (ha) (hectares) Fitted solar kW % of development total	Equivalent surface of heat source installations in average UK houses	Equivalent number of petrol cars switching to a hybrid car
New Development with only planning intervention	589		65 92.8 70%	890 25%	8720 56%
New Development with planning and mobility interventions	158		76 92.8 82%	1078 40%	4112 64%
New Development with planning and mobility interventions and better EV uptake	432		118 92.8 127%	1681 63%	6723 100%

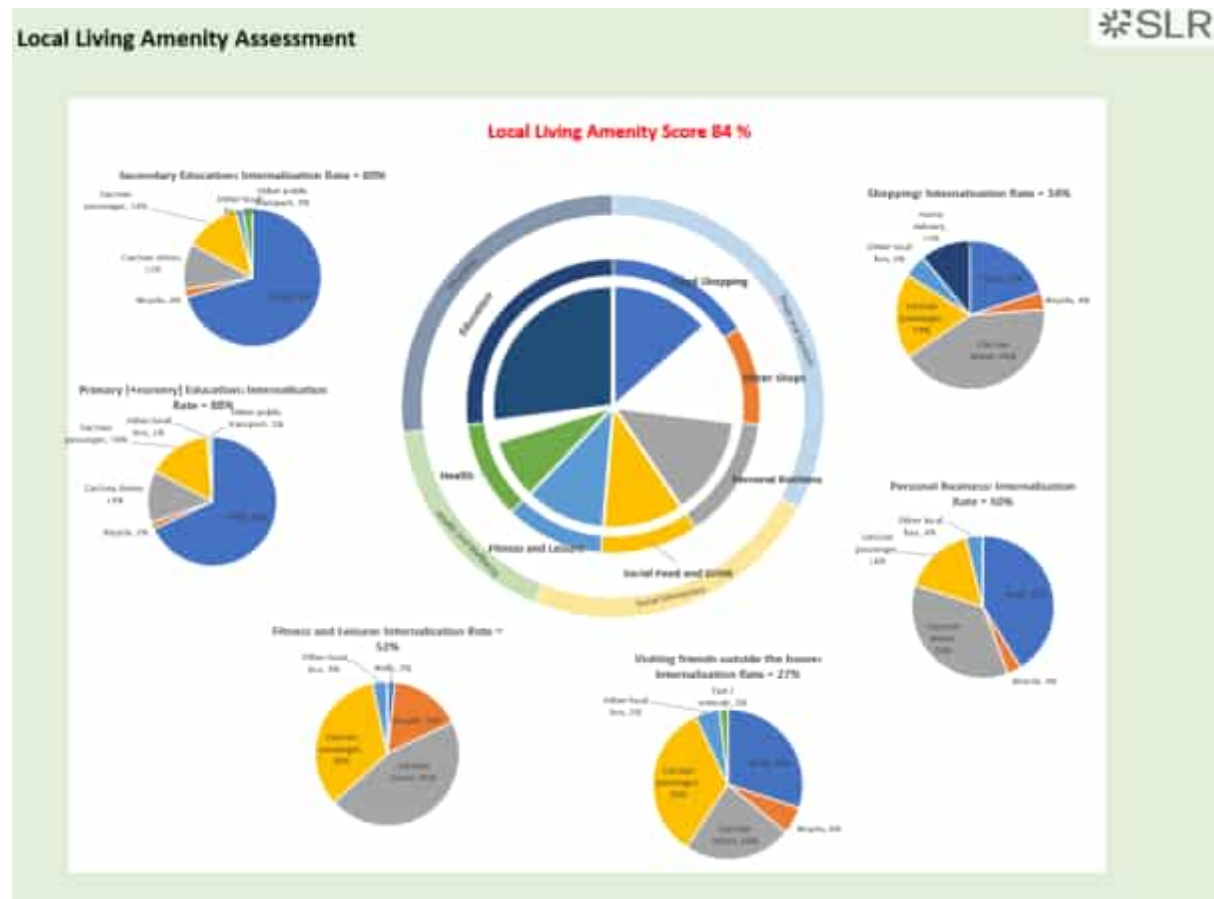
SLR

- Figure 3.7 - Vision led design placemaking and mobility on health at Lodge Farm**



- 3.75 The Tool also predicts a Local Living Amenity Assessment which in the case of Lodge Farm is around 84% based on the Placemaking and Mobility interventions proposed.

Figure 3.8 - Local Living Amenity Assessment



4.0 Response to Anticipated Concerns

Potential for significant trip generation on the network/heavy reliance on the car

- 4.1 The Vision led Planning Tool has been used to quantify the likely traffic effect from development at Lodge Farm in a way which considers the objectives and design of the site taking into consideration the potential for minimising the need to travel offsite through the local living aspirations. Combined with the mobility interventions proposed and S106 measures amounting to some **£10 million**, the effects of external car trips from the site have been quantified.
- 4.2 Compared to a traditional Predict and Provide, TRICS based approach typically taken by strategic highway models (this is the nature of strategic models that are unable to account for site specific interventions) the development at Lodge Farm will contribute to greater than a 60% reduction in forecast traffic compared to the forecasts used within the WCC Strategic Transport model. This clearly demonstrates the benefit of vision led planning, placemaking and step change investment in mobility interventions that only a large site such as Lodge Farm with sufficient critical mass can deliver.
- 4.3 Moreover, the background information provided in Section 2 shows that there has been a 9% reduction in traffic within Rugby between 2011-2023 and a 15% reduction in traffic between 2013 and 2023. In essence, the existing highway network is a lot less congested now than it was more than 10 years ago (and hence there is residual network capacity for Lodge Farm) reinforcing the policy position within NPPF that traffic capacity is almost secondary to 'place' in a vision led system.
- 4.4 In terms of the Council's original assessment work, completed using WCCs traffic model and presented within the 2017 STA, was accepted by the Local Plan Inspector² as robust – 'I am satisfied that the effects of the Plan's development proposals on the transport network can be mitigated over the Plan period, such that the residual cumulative impacts of development would not be severe'
- 4.5 That evidence adopted several robust assumptions which, if revisited in the context of current travel patterns and policies as shown in Section 2, would likely result in a less pessimistic view of how the network will function in the future. These include:
- Traffic flows used within the forecasting are based on a 2016 starting position. Traffic growth has not materialised to the level, which was projected in the 2017 exercise and, as such, the point at which network and junction capacity becomes problematic will now occur later than would have been identified within the original work.
 - Traffic generation estimates used to predict the traffic volumes that would be generated by new developments are based on proxy sites which were also surveyed before the pandemic and, as a result, may also be overly pessimistic, new surveys or methods of estimating future development specific trip generation

² Rugby Local Plan – Inspector's Report 27 March 2019 para 81



(such as the Vision led tool in the appraisal of Lodge Farm) result in lower trip generation estimates than was adopted within the original traffic modelling. Revisiting the trip distribution patterns on a similar basis, making it more 'locally relevant', may also reduce the dispersed nature of currently predicted trip patterns as well as reducing any inherent bias towards journeys of longer distances which can arise through the application of gravity modelling techniques.

- Updates to TEMPro and NTEM growth projections, the introduction of the Common Analytical Scenarios (alongside the recognition that the core scenario represents a position where Government Policies on Net Zero have failed to deliver) and the fact that a number of developments where trip generation levels were estimated within the original modelling have now been built out, means that traffic volumes would likely be lower in new future year models than was the case in the original models (this also points to a situation where additional capacity may exist within the network to accommodate additional development).

- 4.6 The highway schemes identified within the original STA work were considered to be sufficient by the Inspector to mitigate any potential highway impacts. The majority of these schemes and, critically the SWLR, are well progressed and, as such, any risks that key infrastructure which is required to support the current plan will not be delivered are minimal.
- 4.7 It is likely that future assessments, completed in line with the previous STA work, but allowing for changes in both current assumptions and policies to achieve Net Zero, would demonstrate that development at Lodge Farm is possible without inducing a significant impact on highway safety or air quality.
- 4.8 The acceptability of Lodge Farm from a highway capacity perspective is even more certain given the revised traffic forecasts using the Vision-led Planning Tool demonstrating 60% less traffic than Council's traffic forecasts within the strategic traffic model despite a larger scheme through design/placemaking and the proposed mobility interventions.

Traffic Effect at Dunchurch Crossroads

- 4.9 A major issue which was discussed at length during the previous Local Plan hearings was the operation of Dunchurch Crossroads. This is a junction which was previously considered to be over capacity with associated safety and air quality implications.
- 4.10 Since that time, a residential development at Ashlawn Road development has delivered physical highway improvements for Dunchurch crossroads, representing the best possible scheme that could be delivered within the existing highway boundary.
- 4.11 In addition, the South West Link Road (SWLR) was recognised by the Inspector at the time of the previous Local Plan hearing as being critical infrastructure. The delivery of SWLR is now inextricably linked to the south west Rugby development by Homes England and will be delivered as part of this Planning consent which will significantly relieve any perceived transport issues at Dunchurch Crossroads by removing a significant proportion of traffic from the junction.



- 4.12 Notwithstanding the benefits of this future infrastructure, traffic data has been acquired to understand the current position at the Dunchurch Crossroads.
- 4.13 2018 traffic data (**Appendix D**) was obtained from the previous Local Plan Hearings collated by TRACIS a traffic data collection company on behalf of Dunchurch Parish Council and this has been compared (**Table 4.1**) with June 2024 data (**Appendix X**) obtained from Warwickshire County Council.

Table 4.1 –Total junction flows at Dunchurch Crossroads comparison 2018 and 2024.

Year	2018	2024	Net change
Total daily junction movements	17,016	14,997	2,020

- 4.14 The traffic data comparison at Dunchurch Crossroads shows that even without the SWLR, daily traffic movements have reduced by 12% between 2018 and 2024 suggesting that traffic from the proposed development at Lodge Farm could come forward without any further infrastructure improvements at this junction.
- 4.15 Given this, whilst also being in the knowledge that the SWLR will be delivered by development at south west Rugby adding deliver further capacity benefits at this location, it is highly unlikely that there will be any congestion or highway safety issues at Dunchurch Crossroads arising from development of this magnitude at Lodge Farm. The SWLR will effectively remove the north /south movements at this existing junction i.e. those which could be made between the site and Rugby for example.

Feasibility of the Proposed Public Transport Provision

- 4.16 The Vision for the site is predicated on the Transport Strategy (Section 3) which sets out the proposals for bus improvements and this is an integral part of the proposals to ensure travel options for all journey types.
- 4.17 To ensure that the Vision is realised and policy compliant, the development at Lodge Farm is proposing to provide **£7 million** of investment into bus infrastructure. This is likely to include a combination of improved fixed timetable fixed route bus services and more contemporary solutions such as DRT. DRT already operates within Rugby and hence the proposals would be complimentary to the existing services delivering improvement such a more vehicles/improved frequency, extending the operating radius and ensuring the longevity of the DRT.



- 4.18 The promoter is committed to this level of investment to ensure that public transport (bus) becomes a viable alternative to the car for at least the duration of the forecast construction build period of 10 years.
- 4.19 Any uncertainty around the level of funding proposed for enhanced bus provision could be provided within the Infrastructure Development Plan associated with the Local Plan and linked directly to development on this site to guarantee delivery.

Active Travel Accessibility

- 4.20 The offsite improvements to active travel as set out in Section 3 and those measures proposed within the illustrative masterplan are fundamentally important to ensuring that trips of under 1 mile are made on foot or by bike.
- 4.21 The proposals can be delivered within the adopted highway offsite and can ultimately be linked, via Planning Condition, to any future planning on this site ensuring that what is proposed can be delivered in the future.

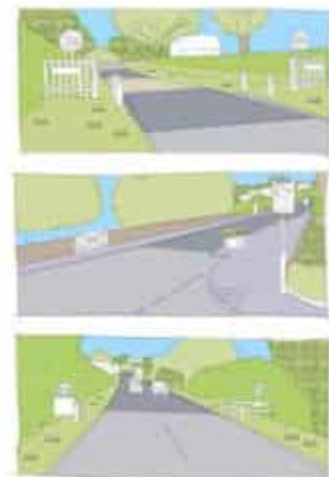
Proposals for safe pedestrian / cycle crossing of the A45.

- 4.22 As per the original masterplan proposed within the Draft allocation, vehicular access is proposed directly via the A45.
- 4.23 It is understood that the A45 at this location, whilst not being a Trunk Road, is a NH Diversion route. Providing there are no technical or policy reasons not to provide direct vehicular access at this location, then the proposed vehicular access from the A45 would be appraised in the same way as any other road. Based on the work undertaken to date by others, there are unlikely to be any technical (design) issues as to why direct vehicular access cannot be achieved from either side of the A45.
- 4.24 The previous masterplan proposed vehicular access via two roundabouts to development on the southern side of the A45. These roundabouts were designed to DMRB standards and would effectively change the character of the A45 at this location.
- 4.25 The current masterplan prepared in response to comments made by the Inspector, proposes vehicular access both north and south of the A45 via signal control (crossroads or staggered), again changing the character of the A45 at this location.
- 4.26 The current speed limit of the carriageway is 50mph and with the proposals, this relatively short section of A45 would operate within, or below 30mph with appropriate speed / village gateway features (gateway signing, planters, chevrons, no centreline etc) on the northbound and southbound carriageway- an example is below.





Narrative sketch of how pedestrian / cycle connections could work across the A42 road corridor



Examples of road traffic calming ideas promoting pedestrian / cycle connectivity



- 4.27 Frontage development on both side of the carriageway will also assist with the change in character/ speed reduction on the A45 at this location.
- 4.28 Moreover, as well as the speed reduction/ character changing features mentioned in the foregoing, the horizontal alignment of the A45 within the immediate vicinity of the development proposed at Lodge Farm can be changed / diverted over a short distance within the development to ensure that the road at this location becomes more of a human scale.



5.0 Summary and Conclusion

Summary

- 5.1 These Transport / Mobility representations are intended to provide a broad overview of why the new settlement residential led- mixed use development at Lodge Farm should be considered as a deliverable strategic site within the forthcoming Rugby Local Plan. The proposals are for up to 2,680 homes, community, health and employment uses, public open space and education- 2FE Primary schools and a secondary school.
- 5.2 These representations are also intended to demonstrate why previous concerns about development on this site are no longer reasons to dismiss this site for residential development, particularly in the context of contemporary UK Planning Policy.
- 5.3 It has been demonstrated that concerns around highway network capacity and congestion within Rugby on a macro scale are not valid given that traffic has reduced in Rugby by 9% from 2011-2023 and by 15% between 2013-2023. This means that the existing highway network is less congested in 2025 than it was more than 10 years despite numerous developments occurring within this timeframe.
- 5.4 On a micro scale, concerns around traffic capacity / congestion at Dunchurch crossroads can also be diluted following physical improvements the junction and the certainty of a bypass to the village funded by development at SW Rugby. Indeed without the bypass, a comparison of traffic data 2018:2024 shows a 12% reduction in traffic (2000 vehicle movements) within the junction. As such, any effect from Lodge Farm at this junction will be minimal and would certainly not be a reason to object to development at Lodge Farm. To put this into perspective, even if all of the traffic in both the AM and PM peaks from Lodge Farm passed through this junction (which is extremely unlikely), this would amount to some +1600 trips which is less than the reduction in total traffic movements at this junction between 2018-2024.
- 5.5 More importantly, the thrust of Planning Policy enshrined within the National Planning Policy Framework (Dec 2024) now encourages professionals within the development industry to create places where people want to live and dwell in sustainable and healthy environments where the car and its convenience, especially during peak times, has less importance compared to other forms of mobility. This is the thrust of the Transport Strategy for Lodge Farm.
- 5.6 This means encouraging development where it can contribute to national climate aspirations (including those within Rugby) enabling inclusive and healthy communities. The easiest way to do this is to ensure that trip making behaviour is internalised within a site and hence any car borne trips made outside of the site are kept to a minimum. SLR's Vision- Led Planning tool predicts 60% less traffic from this site (associated health and CO2 benefits) than would otherwise be the case applying a standardised approach to development with limited mix of uses and no mobility measures – This is a significant benefit of development on this site and aligns perfectly to the Vision and Validate philosophy within the NPPF.



- 5.7 In order to achieve these benefits critical mass and a mix of uses such as that proposed at Lodge Farm is required. Not only does the comprehensive mix of uses include work, leisure and education help in creating 'internalisation' from a movement perspective whereby the large number of trips are made on foot/cycle, but the scale of the site enables significant funding via S106 for 'Gold Star' mobility measures. In this case around **£10million** including £7million for new bus services, car clubs, Brompton Ebikes and comprehensive Travel Planning, Personalised Travel Planning and £500,000 of Travel Planning fighting fund. All of this can be linked to the development and secured in the future via S106 to ensure that the Transport Strategy can be delivered.
- 5.8 A large site such as Lodge Farm can also compliment, rather than compete, with the smaller residential allocations on the fringes of existing development within Rugby.
- 5.9 Off site there are also opportunities to enhance pedestrian and cycle linkages to nearby amenities and centres such as Dunchurch and Rugby and the future Rugby Parkway Train Station meaning that the site, which on the face of it seems remote, can be made more accessible.
- 5.10 Vehicular access to the site can be achieved from both sides of the A45 and there are many options available to change the character of the A45 at this immediate location ensuring that development at both sides of the road are humanised in scale, encouraging safe and seamless integration within the development.

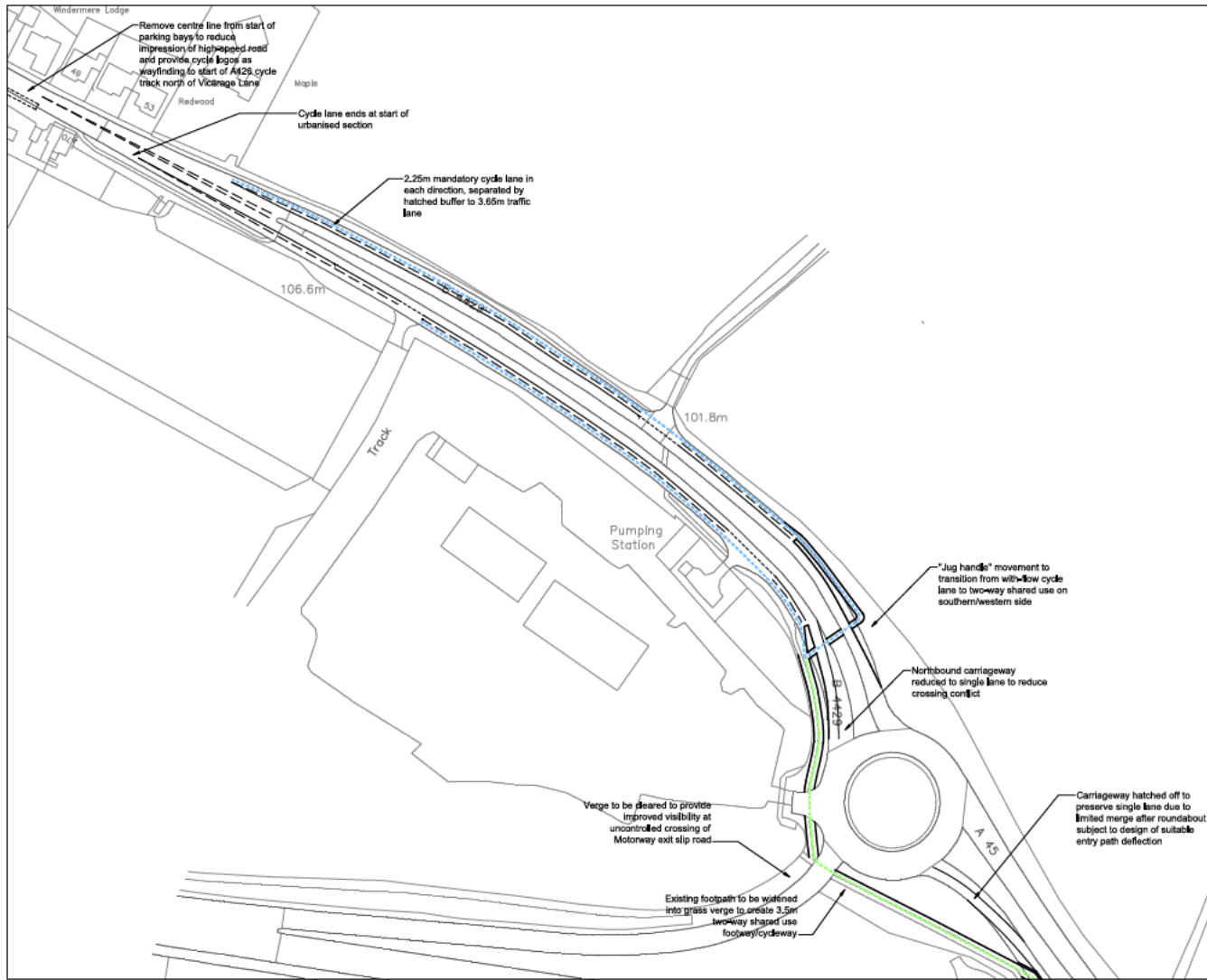
Conclusion

- 5.11 This report has demonstrated why any concerns relating to network/traffic capacity, feasibility of securing a step change in mobility improvements including public transport, active travel accessibility and safe crossing of the A45 can all be addressed quite easily in a sustainable, policy-compliant manner.
- 5.12 The Transport and Mobility Strategy illustrates why Lodge Farm should be strongly considered as part of the Council's Local Plan to deliver much needed housing and related infrastructure, whilst not compromising smaller infill sites or those smaller sites on the fringe of existing communities.
- 5.13 This is a site which from a transport/mobility / policy perspective ticks all of the boxes, can create a step change in the approach to place/design and can bring widespread benefits to existing communities in terms of 'Gold Star' investment in public transport and other mobility options. Importantly all of this can be secured by the Planning system.
- 5.14 The site is acceptable in relation to overall highway impacts (detailed modelling to follow with a Planning Application) and this report demonstrates that highway capacity and existing accessibility is not a reason to resist the proposal. This report demonstrates that in comparison to alternative strategies of spreading growth throughout the district, greater critical mass/ placemaking represents a more sustainable way of delivering housing.
- 5.15 Given this, Lodge Farm ought to be considered for inclusion within the Rugby Local Plan.



APPENDIX A – Cycle Connections





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Client Duties:
The client is directed to Regulation 4 of the CDM 2015 Regulations. Client duties in relation to managing projects

Proposed oneway cycle lane
Proposed two-way cycle path

Rev	Date	Description	Rev	Checked
1	2202-05-01	Issue for construction	1	Checked

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Client St Modwen

Project Lodge Farm, Rugby

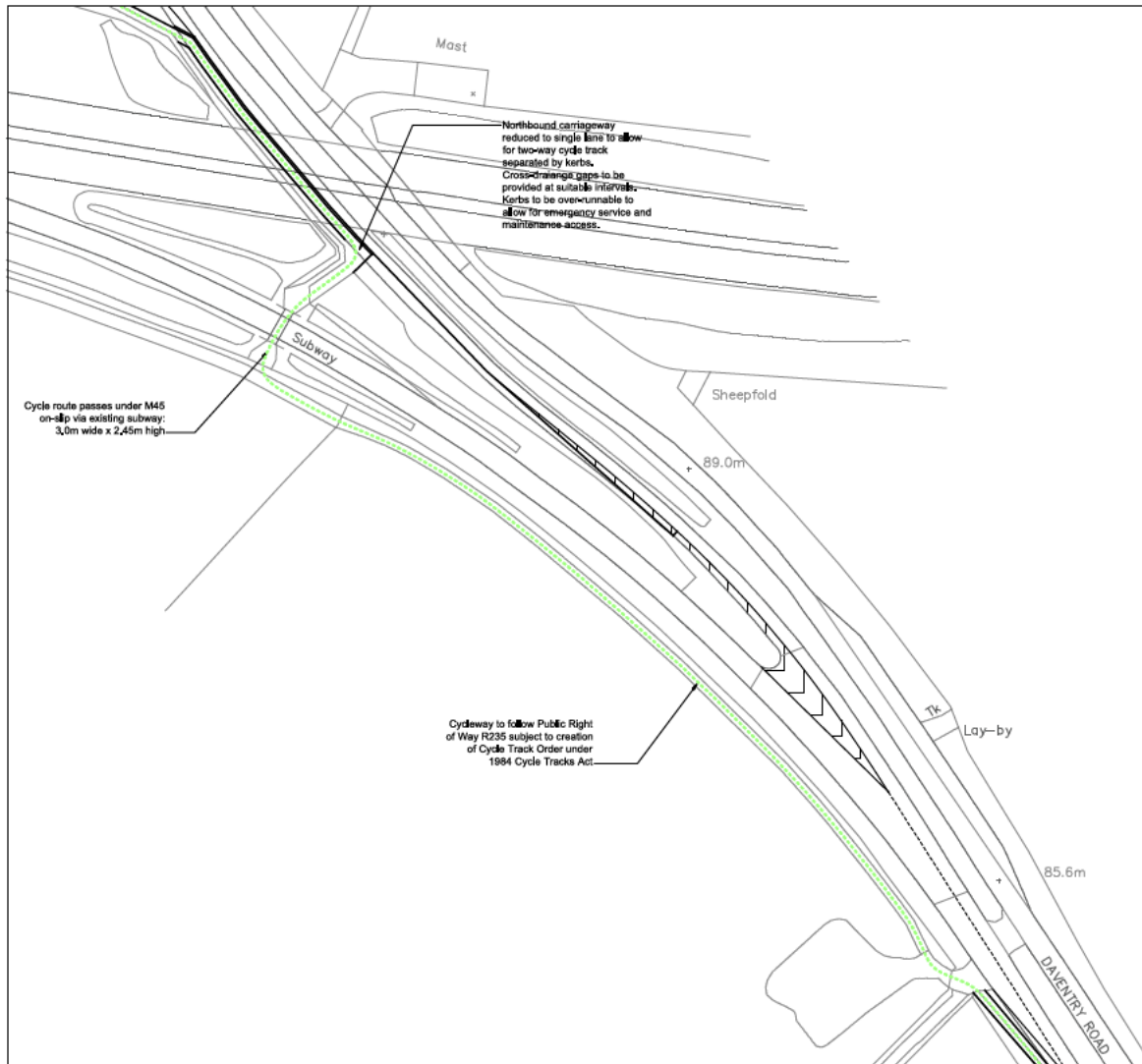
Drawing Proposed Cycle Route Option 1 Sheet 1

Drawn by:	Checked by:	Scale:
AND	ME	1:1250 @ A3

Drawing No.	Revision
2202-05-01-01	-

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File: TV\Projects\Current\2202\2202 Lodge Farm_Rugby\3. Technical\A3_CycleRoute_Option1.dwg



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The client is directed to Regulation 4 of the CDM 2015 Regulations. Client duties in relation to managing projects

Proposed oneway cycle lane
Proposed two-way cycle path

Rev / Date	Description	On Draw
1	Issue for Client	

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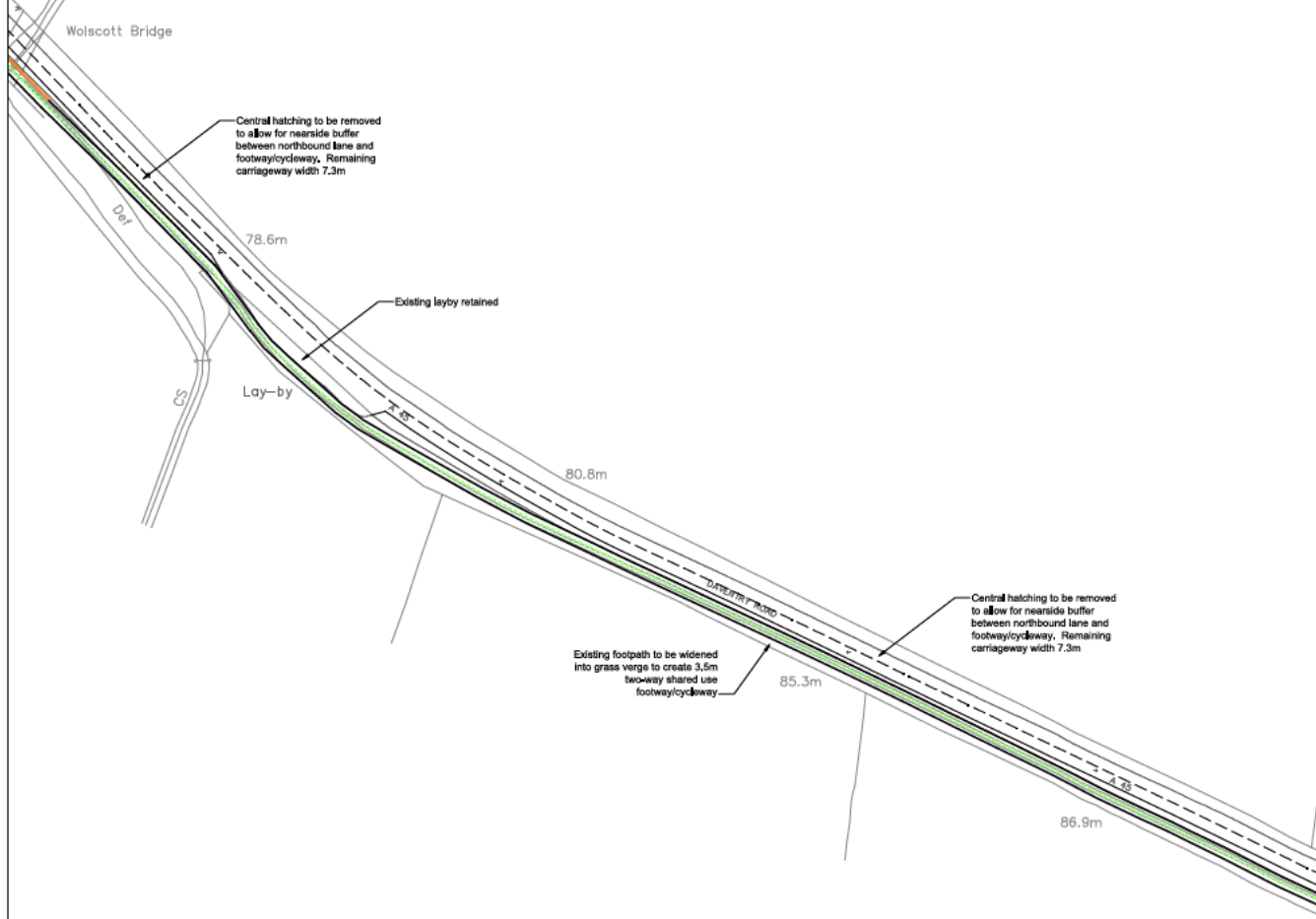
Project: Lodge Farm, Rugby

Drawing: Proposed Cycle Route
Option 1
Sheet 2

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Drawing No: 2202-05-01-02

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Client Duties:
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Proposed oneway cycle lane
Proposed two-way cycle path

Date / Date	Description	Rev	Checked

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Client St Modwen

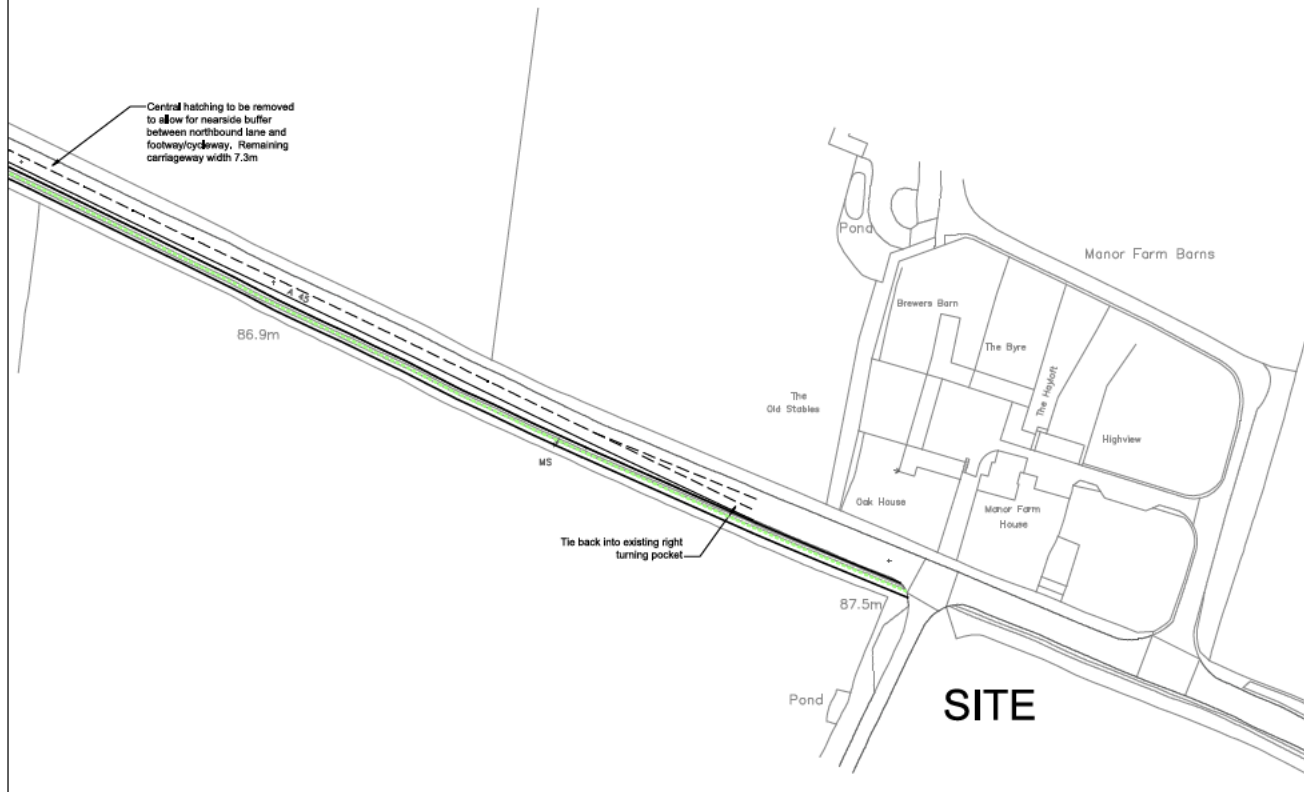
Project Lodge Farm, Rugby

Drawing Proposed Cycle Route
Option 1
Sheet 4

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Drawing No.	Revision
2202-05-01-04	-

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Proposed oneway cycle lane
Proposed two-way cycle path

Rev / Date	Description	Rev / Date
1 / 05-01-05	Issue for construction	1 / 05-01-05

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Email: info@philjonesassociates.co.uk
Website: www.philjonesassociates.co.uk

Client: St Modwen

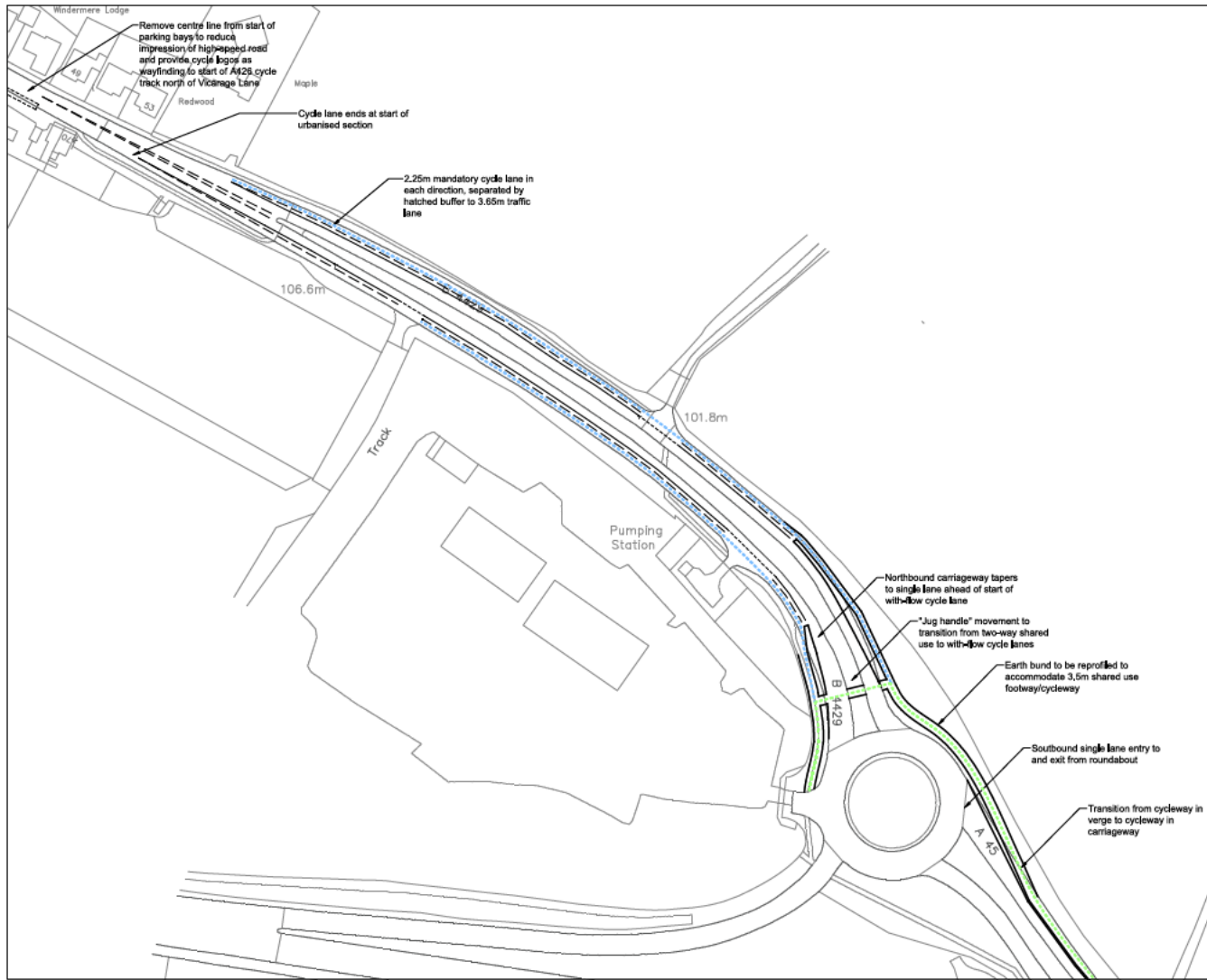
Project: Lodge Farm, Rugby

Drawing: Proposed Cycle Route
Option 1
Sheet 5

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Drawing No: 2202-05-01-05 **Revision:** -

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Client Duties:
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Proposed oneway cycle lane
Proposed two-way cycle path

Rev	Date	Description	Rev	Checked
1	2202-05-02-01			

PHIL JONES ASSOCIATES
landscape planning consultants

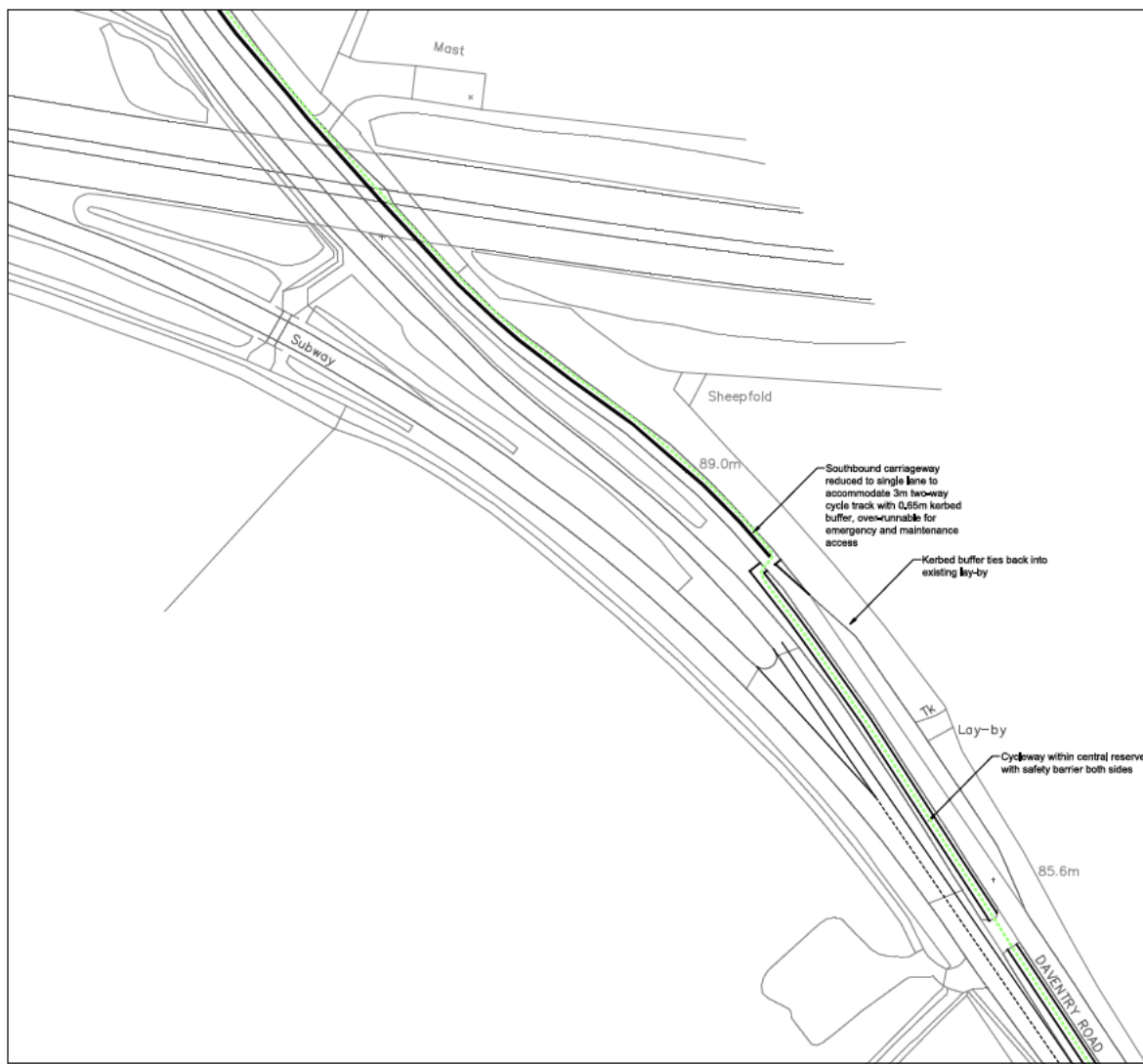
St Modwen

Project: Lodge Farm, Rugby

Drawing: Proposed Cycle Route Option 2 Sheet 1

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Checked by: ME/22020502
Drawing No: 2202-05-02-01 Revision: -

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Client Duties:
The client is directed to Regulation 4 of the CDM 2015 Regulations. Client duties in relation to managing projects

Proposed oneway cycle lane
Proposed two-way cycle path

Rev / Date	Description	Rev / Date
1	Issue for Client	

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Client St Modwen

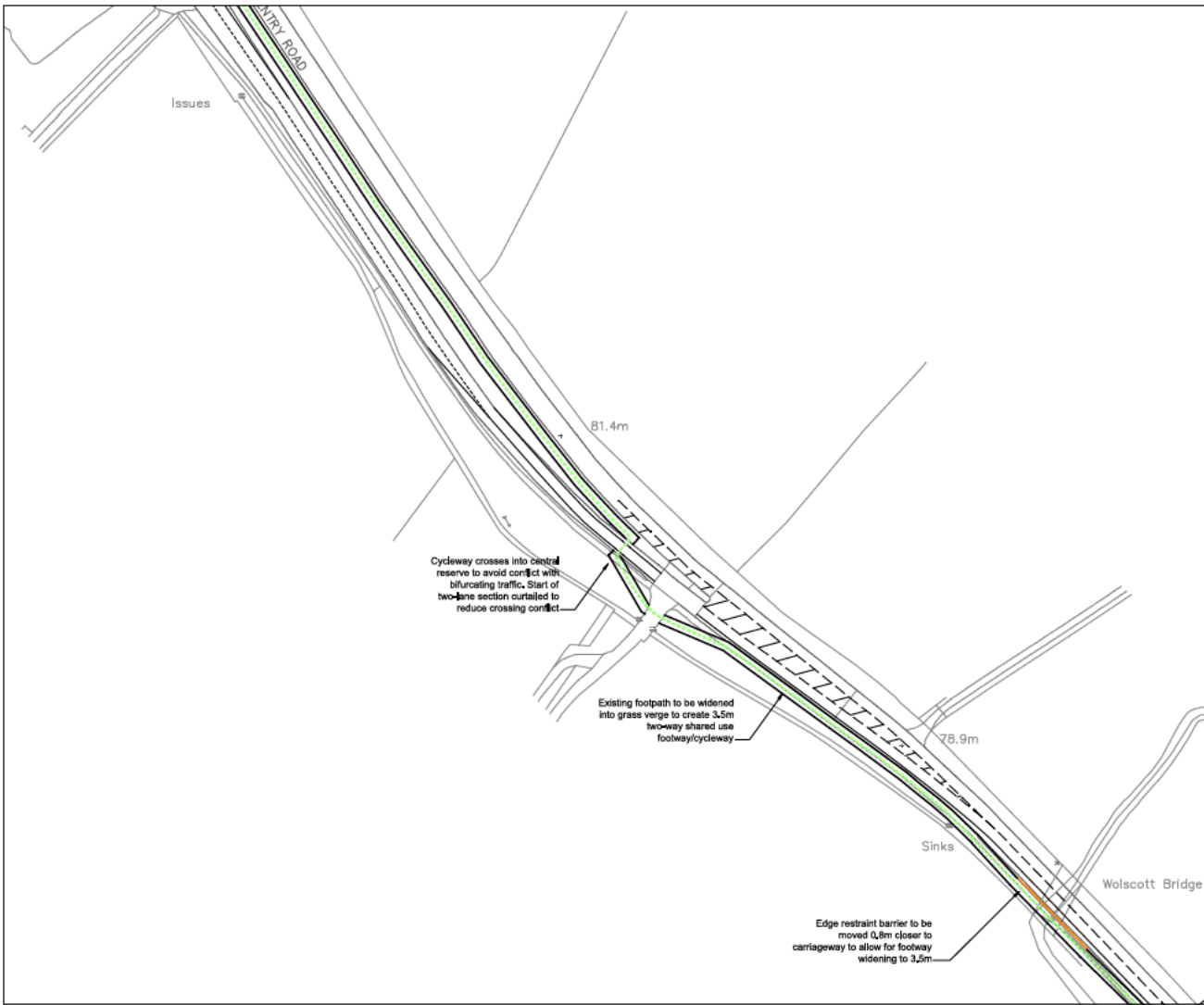
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Drawing Proposed Cycle Route
Option 2
Sheet 2

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Drawing No.	Revision
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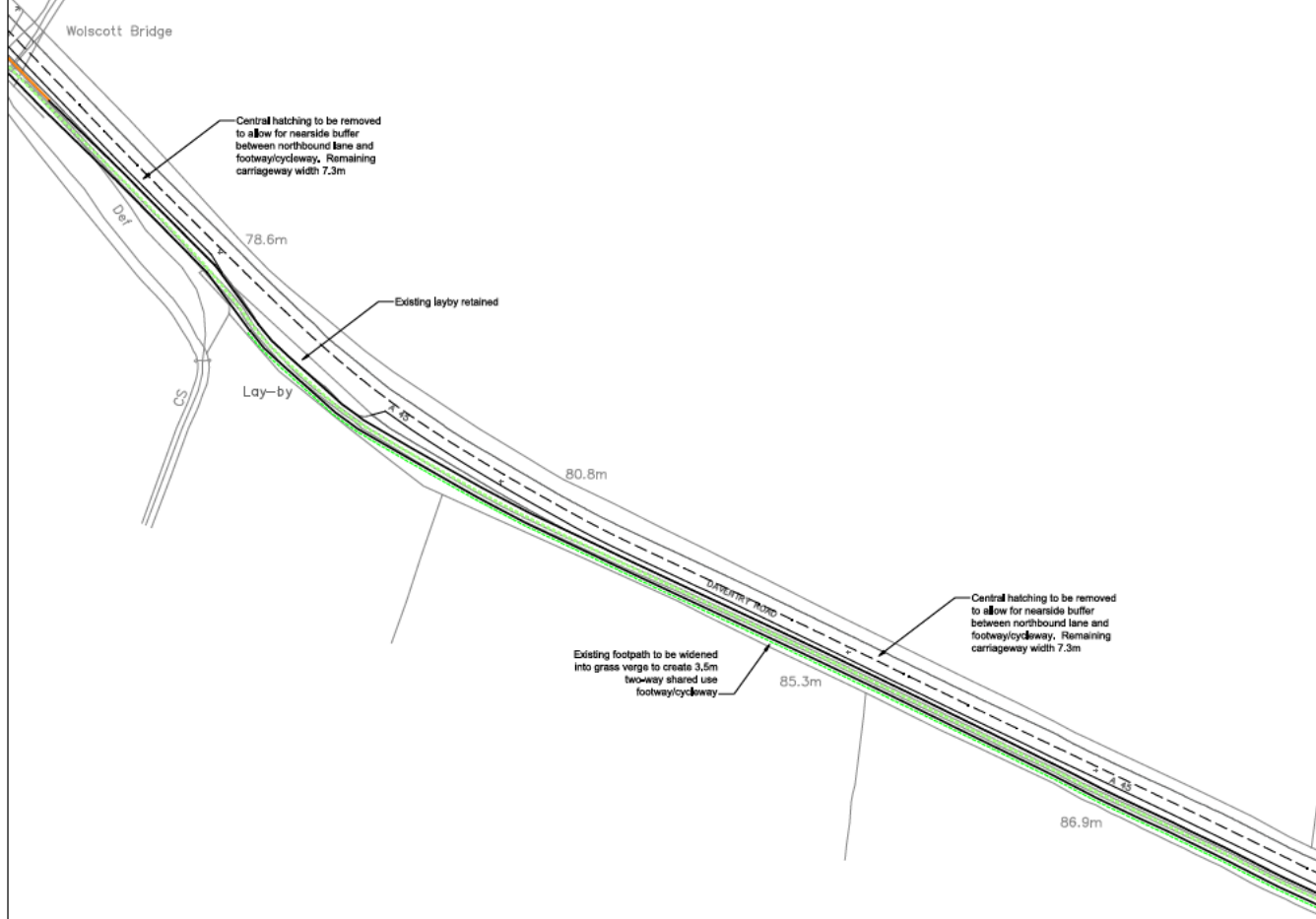
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Client Duties:
The client is directed to Regulation 4 of the CDM 2015 Regulations. Client duties in relation to managing projects

- Proposed oneway cycle route
- Proposed two-way cycle path

Rev / Date	Description	Rev	Checked
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Client		St Modwen	
Project		Lodge Farm, Rugby	
Drawing Proposed Cycle Route Option 2 Sheet 3			
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Checked by: ME/me@pja.co.uk		Revision	
Drawing No. 2202-05-02-03		Revision	
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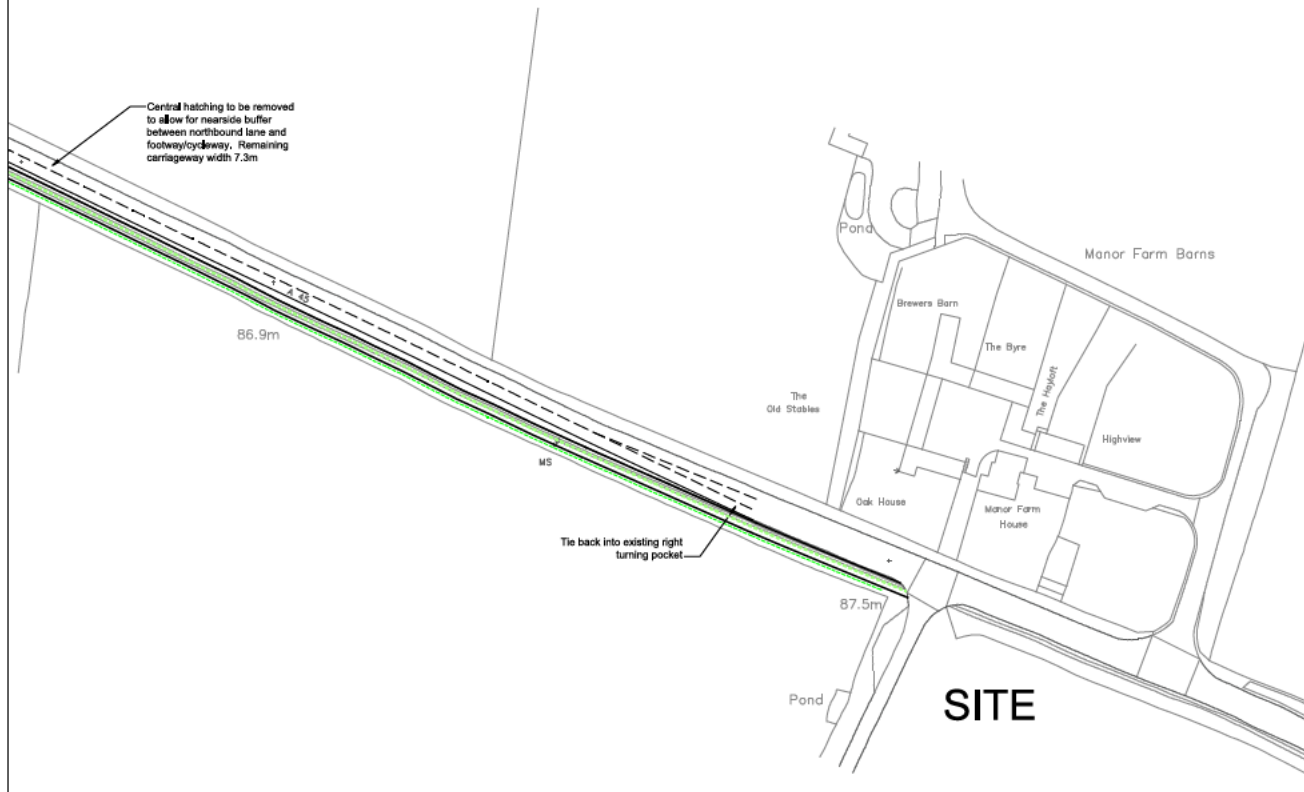
Client Duties:
The client is directed to Regulation 4 of the CDM 2015 Regulations. Client duties in relation to managing projects

Proposed oneway cycle lane

Proposed two-way cycle path

Date / Date	Description	On / Off
 PHIL JONES ASSOCIATES Design Planning Construction		
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Client	St Modwen	
Project	Lodge Farm, Rugby	
Drawing	Proposed Cycle Route Option 2 Sheet 4	
Drawn by: ANS	Scale:	1:1250 @ A3
Checked by: ME	Revision	
Drawing No.	2202-05-02-04	
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Client Duties:
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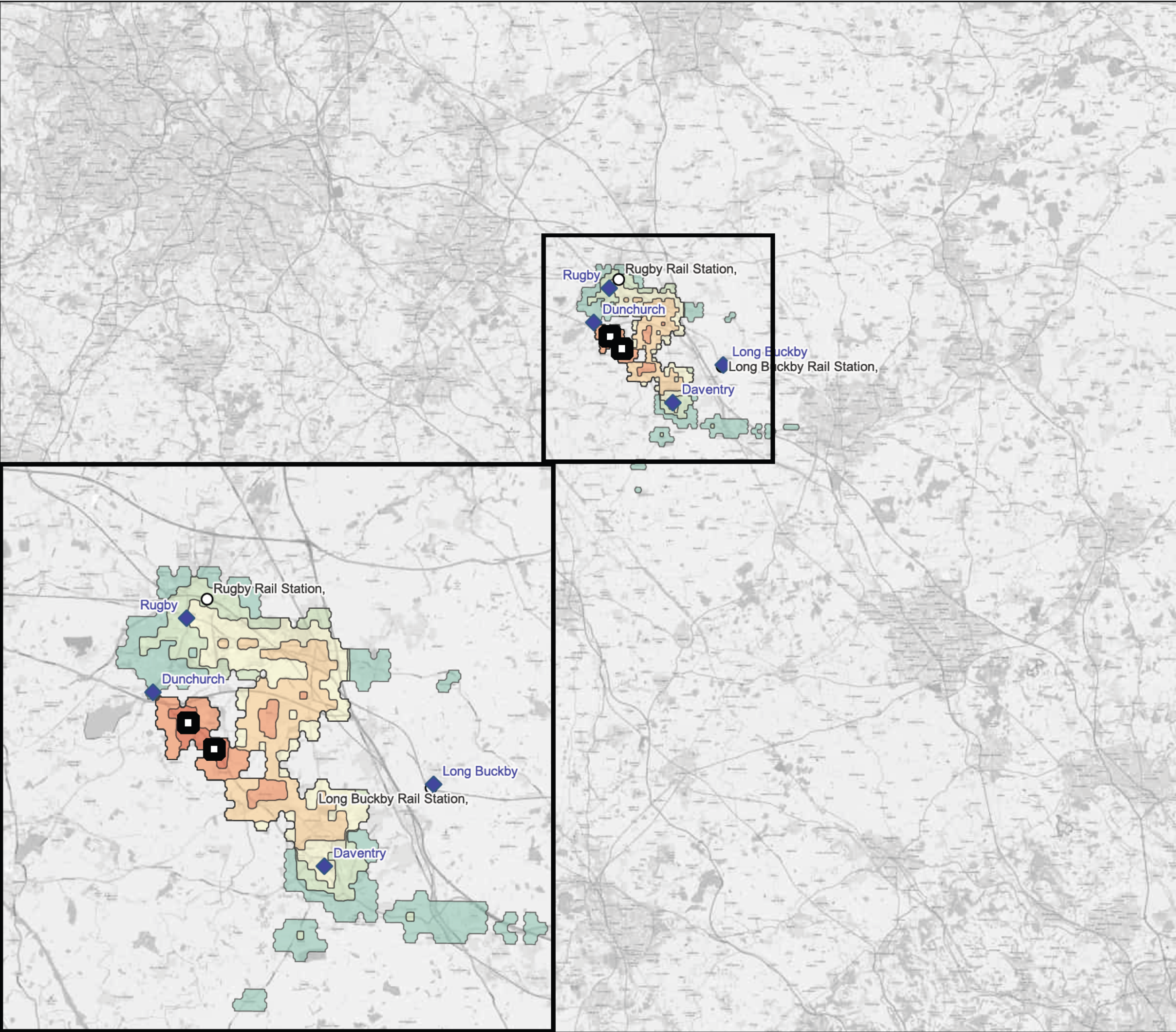
Proposed oneway cycle lane
Proposed two-way cycle path

Rev / Date	Description	Rev / Date
PHIL JONES ASSOCIATES landscape planning consultants		
Rugby Home Park Street Loughborough, Leicestershire, LE11 1AD Tel: 01509 451234 Fax: 01509 451235 Email: info@philjonesassociates.co.uk www.philjonesassociates.co.uk		
Client		St Modwen
Project		Lodge Farm, Rugby
Drawing Proposed Cycle Route Option 2 Sheet 5		
Drawn by: ANS/2202-05		Scale: 1:1250 @ A3
Checked by: ME/2202-05		Revision
Drawing No. 2202-05-02-05		Revision
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APPENDIX B –TRACC analysis





Legend

AM Accessibility by Combined Public Transport Modes:

- 15 mins
- 30 mins
- 45 mins
- 60 mins
- 75 mins
- 90 mins

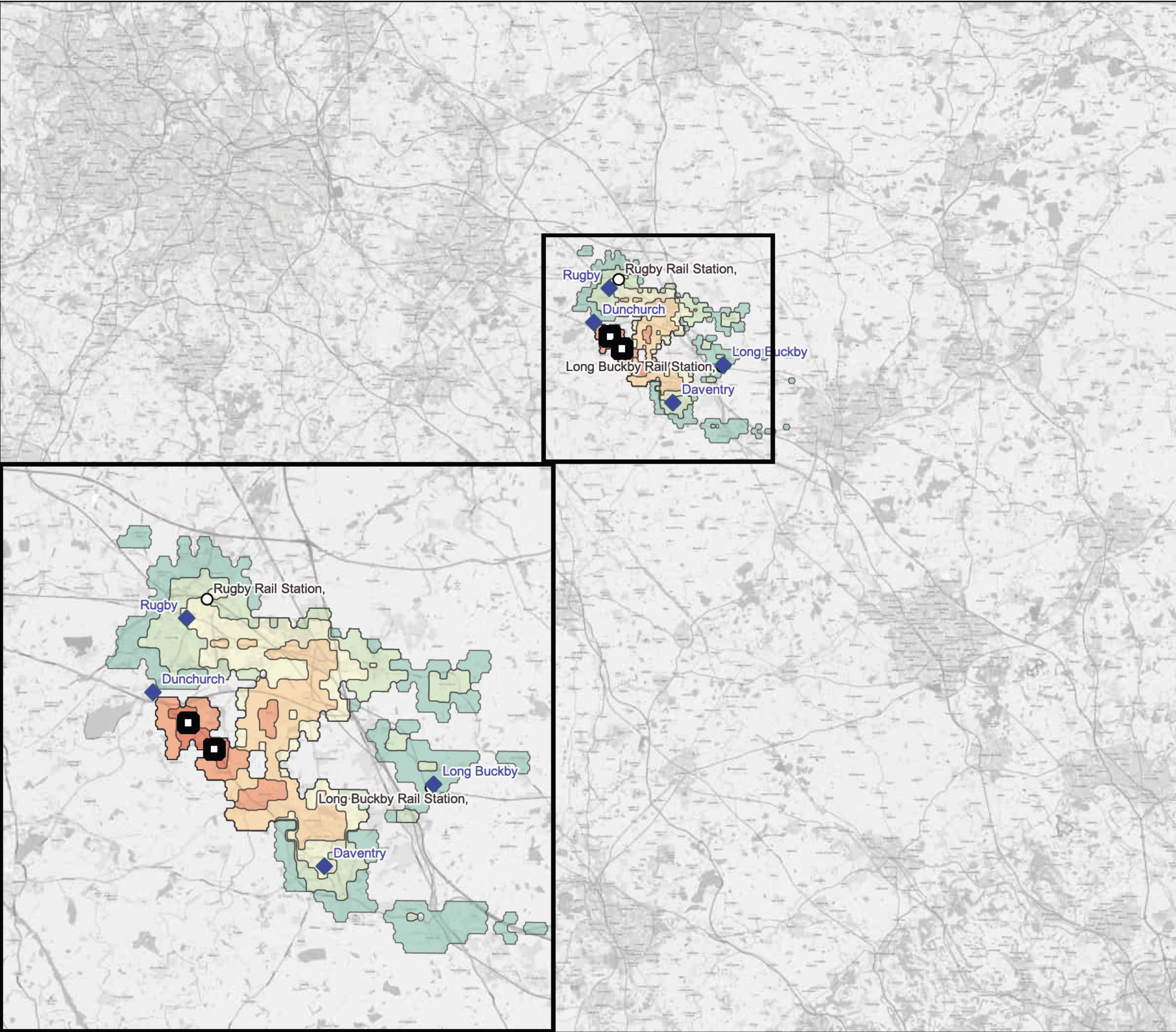
■ Lodge Farm Site access

◆ Key Towns and Cities

○ Key Rail Stations

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PROJECT:			
Lodge Farm			
TITLE:			
Lodge Farm Accessibility by Combined Public Transport Modes within 90 minutes AM Period (07:00 to 10:00)			
SCALE:			
NTS			
DRAWN:	CHECKED:	DATE:	REVISION:
MHT	FT	17/01/2024	1
			
7th Floor, 36 Great Charles Street, Birmingham, B3 3JY Tel: 0121 289 5610 Email: microsim@vectos.co.uk www.vectos.co.uk			
DRAWING REFERENCE:			



Legend

PM Accessibility by Combined Public Transport Modes:

15 mins

30 mins

45 mins

60 mins

75 mins

90 mins

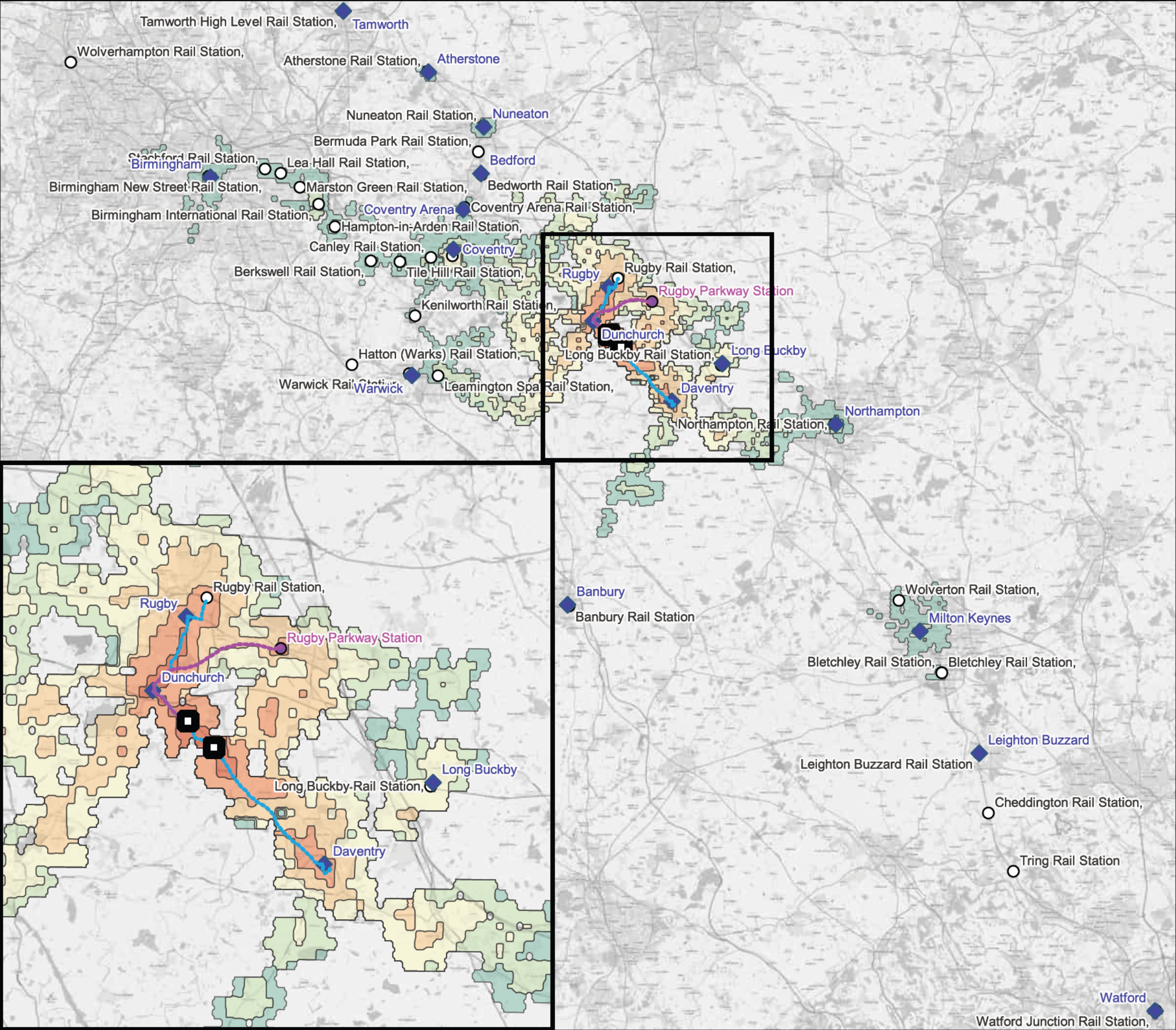
Lodge Farm Site access

Key Towns and Cities

Key Rail Stations

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PROJECT:			
Lodge Farm			
TITLE:			
Lodge Farm Accessibility by Combined Public Transport Modes within 90 minutes PM Period (16:00 to 19:00)			
SCALE:			
NTS			
DRAWN:	CHECKED:	DATE:	REVISION:
MHT	FT	17/01/2024	1
SLR			
7th Floor, 36 Great Charles Street, Birmingham, B3 3JY Tel: 0121 289 5610 Email: microsim@vectos.co.uk www.vectos.co.uk			
DRAWING REFERENCE:			



Legend

AM Accessibility by Combined Public Transport Modes:

15 mins

30 mins

45 mins

60 mins

75 mins

90 mins

Lodge Farm Site access

Proposed Bus Line

Proposed Direct Shuttle Line

Key Towns and Cities

Proposed Rugby Parkway Station

Key Rail Stations

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PROJECT:

Lodge Farm

TITLE:

Lodge Farm Accessibility by Combined Public Transport Modes with Proposed Direct Shuttle, Bus Line and Rugby Parkway Station within 90 minutes AM Period (0700 to 10:00)

SCALE:

NTS

DRAWN:

MHT

CHECKED:

FT

DATE:

17/01/2024

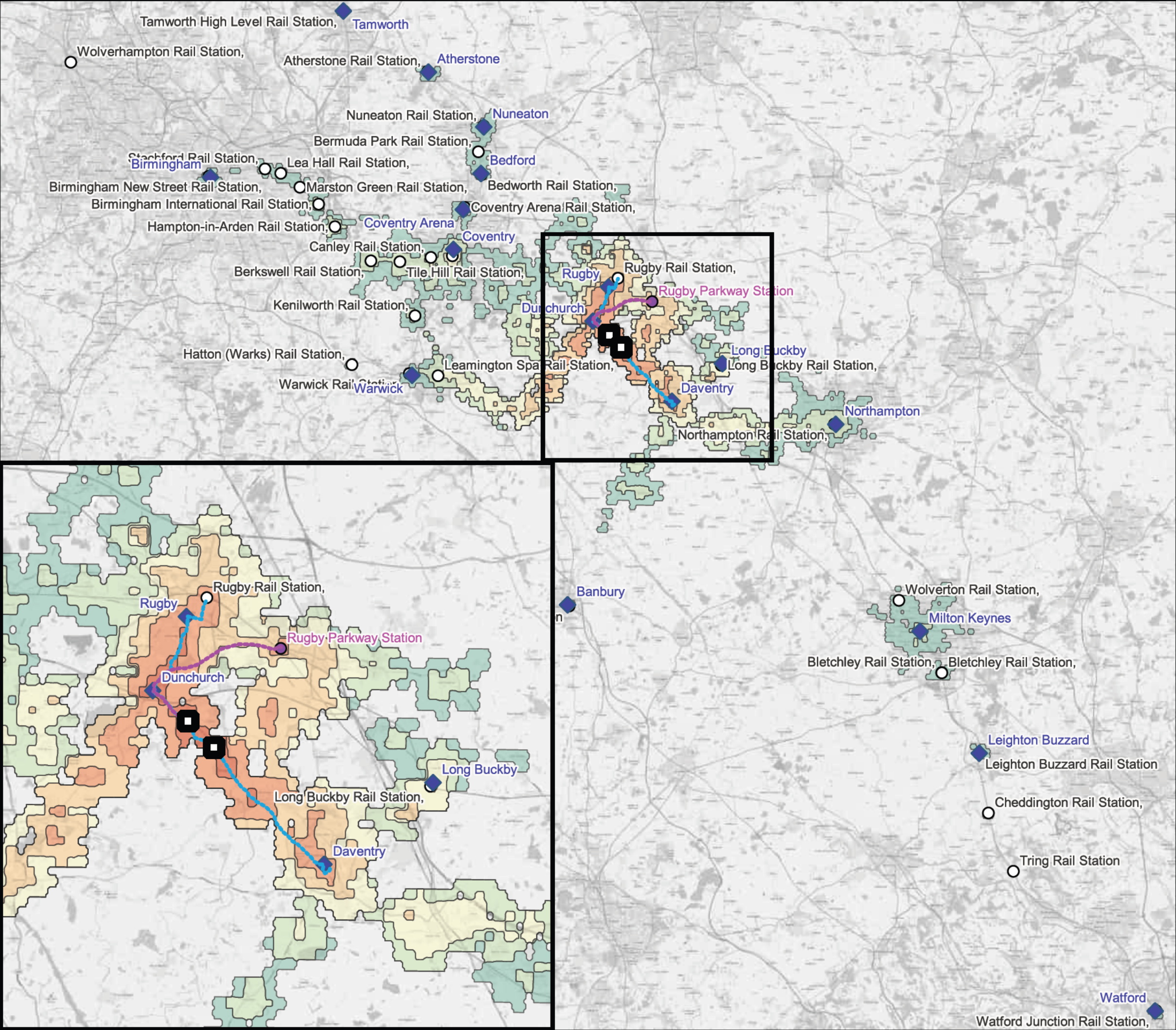
REVISION:

1

SLR

7th Floor, 36 Great Charles Street, Birmingham, B3 3JY
Tel: 0121 289 5610 Email: microsim@vectos.co.uk www.vectos.co.uk

DRAWING REFERENCE:



Legend

PM Accessibility by Combined Public Transport Modes:

15 mins

30 mins

45 mins

60 mins

75 mins

90 mins

Lodge Farm Site access

Proposed Bus Line

Proposed Direct Shuttle Line

Key Towns and Cities

Proposed Rugby Parkway Station

Key Rail Stations

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PROJECT:			
Lodge Farm			
TITLE: Lodge Farm Accessibility by Combined Public Transport Modes with Proposed Direct Shuttle, Bus Line and Rugby Parkway Station within 90 minutes PM Period (16:00 to 19:00)			
SCALE: NTS			
DRAWN:	CHECKED:	DATE:	REVISION:
MHT	FT	17/01/2024	1
7th Floor, 36 Great Charles Street, Birmingham, B3 3JY Tel: 0121 289 5610 Email: microsim@vectos.co.uk www.vectos.co.uk			
DRAWING REFERENCE:			

APPENDIX C – Vision Led Planning Tool – Case Study Applications





SLR's Vision Led Planning Tool

Case Study Applications

Prepared by:

SLR Consulting Limited

3rd Floor, Summit House, 12 Red Lion Square,
London, WC1R 4QH

5 March 2025

Revision: 1.0

Table of Contents

1.0 Introduction	2
COED DARCY – NEATH PORT TALBOT	4
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1.0 Introduction

- 1.1 SLR promote a 'Vision-led' approach to masterplanning for mixed-use developments. Vision-led transport planning is a modern transport planning method that supports the objectives of the National Planning Policy Framework and the net zero carbon policies of Local Planning Authorities. It can also promote the ESG objectives of developers and masterplanners.
- 1.2 Vision-led Planning is a method which focusses on the desired outcomes of a new development, then identifies placemaking and mobility interventions to realise those outcomes. The objective is to deliver well-designed, sustainable and popular places. The realisation of the vision's outcomes carries greater importance than simply predicting future traffic demand to provide capacity.
- 1.3 SLR delivers the vision through a combination of placemaking and mobility interventions:
 - on-site amenity provision that is within walkable distance from home,
 - street design that affords space to people rather than vehicles and puts active travel first,
 - mobility interventions that enhance the non-car connections to external destinations, and
 - places of social interaction that are accessible to all, including high quality green spaces.
- 1.4 The **placemaking and mobility interventions** to realise the vision can include 15 minute neighbourhood design, provision of local amenities and street design that affords space to people rather than vehicles, active travel corridors, good public transport connectivity, mobility hubs.
- 1.5 Vision-led masterplanning is likely to result in fundamentally different site designs to those established under the former 'Predict and Provide' approach.
- 1.6 SLR have developed a Vision-led Planning Tool to quantify key impacts resulting from different site designs and tailored to specific site characteristics and local context.
- 1.7 The Vision-led Planning Tool calculates the Vision-led site design impact on travel demand, modal share, carbon emissions, air quality and health impacts resulting from including a specific mix of local amenities and employment within the development, designing for pedestrian and cycle access for internal trips to these amenities, and options for supporting sustainable alternatives to car use for remaining external trips. This ensures that from the masterplanning stages, the community is designed in a way which will achieve its vision objectives.
- 1.8 The Tool can be used at different stages of the planning development process:
 - At the pre-app stage supporting design thinking to unlock a project's strategic challenges / advantages and aid promotion of the site.



- At the outline or full planning application stage to quantify the outcomes of including different placemaking and transport elements within the site design: this will help identify and hone the amenities to include & what mobility interventions to consider when finalising the masterplan design

1.9 This note presents a number of case study developments where the Tool has been applied highlighting the reasons for adopting a Vision-led approach and for using the tool and giving insights into the outcomes from this approach.



COED DARCY – NEATH PORT TALBOT

2000 Dwellings	Edge of town development: 7km East of Swansea City Centre and 4.5km West of Neath town centre, beside Jnc 43 of M4.
----------------	---

History

Phase 1 of the 2008 outline permission comprising 300 dwellings has been delivered.

The remainder of dwellings planned under traditional 'predict and provide' methods stalled due to cost of infrastructure making subsequent phases unviable.

Revised application for a mixed-use development with 2000 dwellings was submitted in 2021, also using the 'predict and provide' methods.



A Vision-led approach

Responding to policy changes, Neath Port Talbot Council (NPTC), Transport for Wales and the Welsh Government required additional active travel measures and reduced junction capacity mitigation. It was agreed that a Vision-led approach should subsequently be adopted for the revised application, and the Vision-led Planning Tool be used to quantify the Trip Generation taking account of local amenity provision and greater emphasis on cycling and walking connections.

Site Design Components

On-site amenities to include a through school, public open space, commercial uses and employment uses.

Existing employment centres and leisure uses located nearby.

Based on the planned cycle infrastructure improvements an expected doubling of cycle trips is assumed – corresponding to a 3% point shift in car driver to cycle journeys in the < 5 mile range

Key Results

Internalisation Rates derived from Tool:

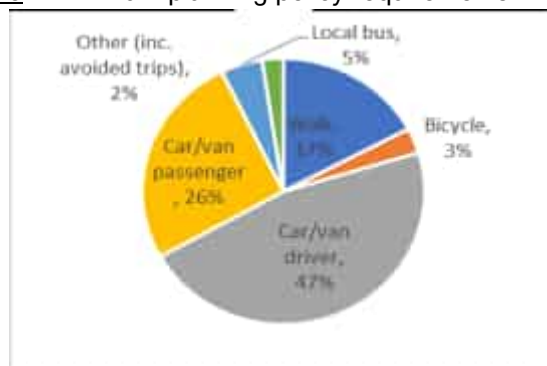
- 36.3% Daily average
- 56.0% 0800-0900 a.m.
- 29.4% 1700-1800 p.m.

External car trip generation rate per dwelling:

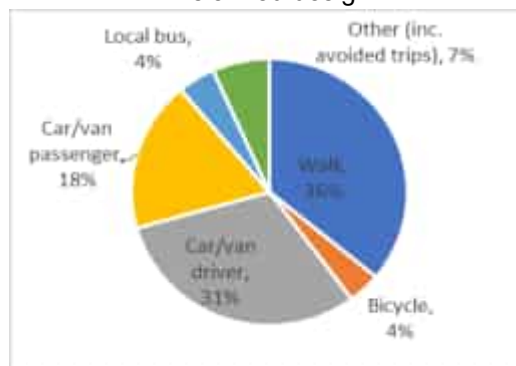
- 0800-0900: **0.228** car trips per dwelling
- 1700-1800: **0.267** car trips per dwelling

➔ 45-50% less external car trips generated compared to minimum planning policy requirements

Mode Share Minimum planning policy requirements



Vision-led design



Outcomes

The consequential lower trip generation of the new scheme resulted in a reduced junction capacity mitigation scheme at M4 Junction 43 with fewer entry and circulatory lanes. The highway cost savings were used to fund additional active travel measures.

Planning Authority Response and Status

NPTC accepted use of the Tool as basis of trip generation assessment and have accepted the results.

Currently awaiting planning consent recommendation from officers.



MUXTON – TELFORD AND WREKIN

3000 Dwellings

Large area, 9km North East of Telford Town Centre and presents a natural expansion to the existing development in this location.

History

The Telford and Wrekin Council Local Plan identifies a number of proposed site allocations for areas that could accommodate Proposed Sustainable Urban Extensions. One of which is the Land North East of Muxton.

A completely new / formal representation is being made to the Telford and Wrekin Council Local Plan Review promoting the benefits and advantages of the Muxton site based on a Vision-led approach to site design.



A Vision-led approach

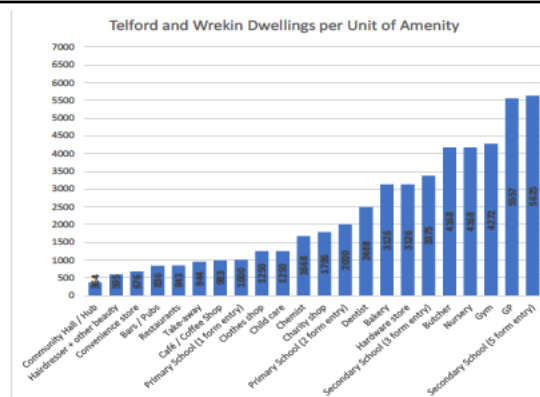
Telford and Wrekin Council declared a Climate Emergency on the 25th July 2019, committing to carbon neutrality from the Council's controlled operations and activities by 2030. This included that any proposed development should address the climate emergency through sustainable development, low carbon design, prioritising active travel and promotion of sustainable activities.

The Vision-led approach aligns with these requirements providing an understanding on how site infrastructure can dictate and impact the site, in terms of site internalisation / local living and ultimately the wider impact on the existing local highway network. The Tool also quantifies future carbon and air quality emissions for different site design options allowing impact assessment against carbon goals.

Site Design Components

On-site amenities likely to include Secondary (4 form entry) and 2 x Primary School (2 form entry), Convenience Store, Take-away, Chemist, Restaurant, Bar, Café, Hairdresser/Beauty Salon, Community Hall, Nursery and Child Care.

Public transport improvements and pedestrian and cycle initiatives are to be decided but will connect to the adjoining urban fabric to provide a cohesive and sustainable living environment where mobility occurs in the way envisaged by planning policy. The consequence is also minimal reliance on, and effects of, private car travel



Key Initial Results

Internalisation Rates derived from Tool:

- 35.6% Daily average
- 55.1% 0800-0900 a.m.
- 27.9% 1700-1800 p.m.

External car trip generation rate per dwelling:

- 0800-0900: **0.24** car trips per dwelling
- 1700-1800: **0.281** car trips per dwelling



Outcomes

Utilising the Vision-led Planning Tool suggests that there are real opportunities to create a liveable, vibrant, safe, healthy and sustainable community achieved through a combination of the existing location in relation to existing amenities, and the proposed new amenities within the site.

Planning Authority Response and Status

Tesni Properties (the client) welcome the opportunity to explore the use of the Tool further including the identification of infrastructure that could reasonably be included within the Infrastructure Delivery Plan. The Council are engaged in this as part of the ongoing Local Plan Review process.



MONKTON HEATHFIELD - SOMERSET

1450 Dwellings

Walford Cross, 9km North East of Taunton Town Centre with A38 skirting the western edge of the site and the M5 skirting the eastern edge.

History

Phase 1 of Monkton Heathfield, implemented before SLR's involvement, incorporating a large relief road that encircled the development.

Phase 2, in which SLR is involved, is located on the opposite side of this relief road, presenting significant challenges related to severance and connectivity. The initial Local Plan proposed an additional relief road to address these issues, also based on the Predict and Provide (P&P) model.



A Vision-led approach

Somerset's Climate Emergency Strategy, adopted in November 2020, underscores the urgent need to reduce carbon emissions and enhance the county's resilience to the inevitable impacts of climate change. In the transport sector, the focus has shifted from expanding road capacity and prioritising car convenience (Predict and Provide) to actively reducing car dependency while promoting public transport and active travel.

By applying a Vision-Led Planning approach and tool, it was demonstrated that an additional relief road was unnecessary and that traffic flows on the A38 could be maintained at current levels in alignment with net-zero goals. A targeted strategy was developed to achieve this outcome.

The Vision-Led model has been instrumental in establishing a strong evidence base, showcasing how a well-structured mobility strategy and integrated land-use planning can mitigate traffic impacts while supporting the Masterplan Vision. The VLP tool proved particularly valuable in discussions, enabling the seamless exploration of various scenarios (e.g. different land uses and mitigation measures) ensuring informed decision-making.

Site Design Components

The development will feature a range of on-site amenities, including educational facilities, retail options, dining establishments, leisure and sports facilities, personal services, and community spaces.

A designated area is planned for strategic employment, expected to create a significant number of on-site jobs, with additional employment opportunities linked to local services and amenities.

A proposed mobility hub will serve as a focal point for sustainable travel, supporting an enhanced public transport network, including increased bus service frequency.

Improved off-site cycling and pedestrian infrastructure will strengthen active travel connections to surrounding areas, complemented by an extensive network of pedestrian and cycle routes within the development.

Additional sustainable transport initiatives, such as a car-sharing scheme, will further support reduced car dependency.

Key Results: Vision-led design

Internalisation Rates derived from Tool:

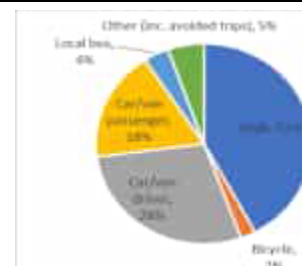
- 39.3% Daily average
- 57.7% 0800-0900 a.m.
- 32.2% 1700-1800 p.m.

External car trip generation rate per dwelling:

- 0800-0900: **0.226** car trips per dwelling
- 1700-1800: **0.268** car trips per dwelling

➔ 30% (p.m. peak) to 45% (a.m. peak) less external car trips generated compared to minimum planning policy requirements

Overall mode share for site:



Outcomes

As a result of our Vision-Led Planning (VLP) approach, the planning application for MH2 no longer includes the second (eastern) relief road and also seeks to scale back the additional highway capacity initially approved for MH1, such as reducing roundabout sizes or removing altogether. These adjustments align more closely with broader local policy objectives, including climate action, public health, and economic sustainability.

Planning Authority Response and Status

The Local Highway Authority (LHA) requested further details on the methodology behind the VLP tool. In response, SLR provided a technical note and made the tool available for interrogation and further review by the LHA's modelling consultants, ultimately leading to the LHA's approval of the methodology. Planning approval is anticipated in early 2025.



LAND SOUTH OF GARTREE ROAD – LEICESTERSHIRE

4000 Dwellings

Edge of town development: 7 miles south-east of Leicester City Centre and 2.5 miles south-east of Oadby town centre. Site directly north of A6.

History

Following successful representations to Harborough and Oadby and Wigston Authorities for the site to be allocated in their local plan, a full planning application is now being prepared.

A key requirement was to demonstrate that the site is deliverable in highways and transport terms particularly in the context of the LHA deeming there to be perceived highway capacity constraints in the locale.

Envisaged Reporting Structure



A Vision-led approach

The reason for adopting the Vision-led approach was to be in line with the most up-to-date Government policy and:

- to promote local living, vibrant places,
- to deliver more healthy communities (lower carbon emissions more active travel),
- to respond to net zero carbon goals

The Vision-led approach aligns with these requirements providing an understanding on how site placemaking and mobility infrastructure can dictate the level of trip internalisation / local living, facilitate more active travel and also quantify vehicle movements generated from/to the site plus future health, carbon and air quality emissions for different site design options allowing impact assessment against carbon goals.

Site Design Components

On-site amenities likely to include 2 x Primary Schools, 2 x Convenience Stores, Take-away, Chemist, Restaurant, Café, GP, Community Hall and Nursery.

On-site employment TBC.

The planned mobility interventions will be identified in the work of *iTransport* when determining the mobility strategy for the site, but will include strong sustainable transport connections to the existing settlement of Oadby. These have still to be confirmed and are not yet included in the assessment.

Key Results

Internalisation Rates derived from Tool:

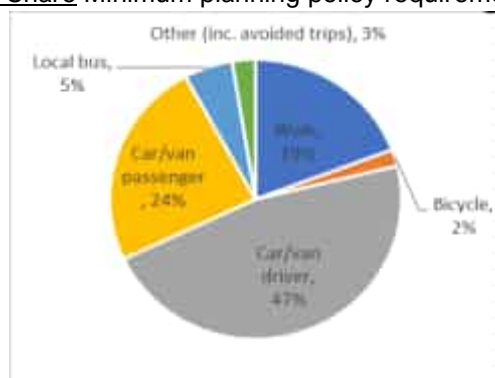
- 35.1% Daily average
- 39.7% 0800-0900 a.m.
- 29.9% 1700-1800 p.m.

External car trip generation rate per dwelling:

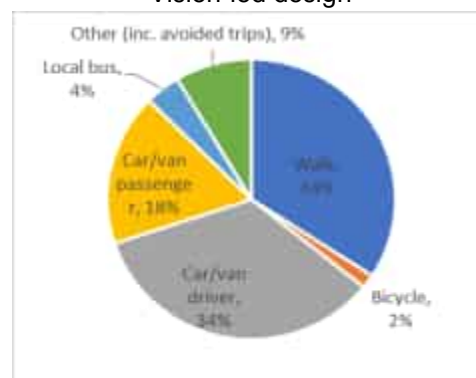
- 0800-0900: **0.274** car trips per dwelling
- 1700-1800: **0.294** car trips per dwelling

➔ 38% less external car trips generated in a.m. peak compared to minimum planning policy requirements

Mode Share Minimum planning policy requirements



Vision-led design



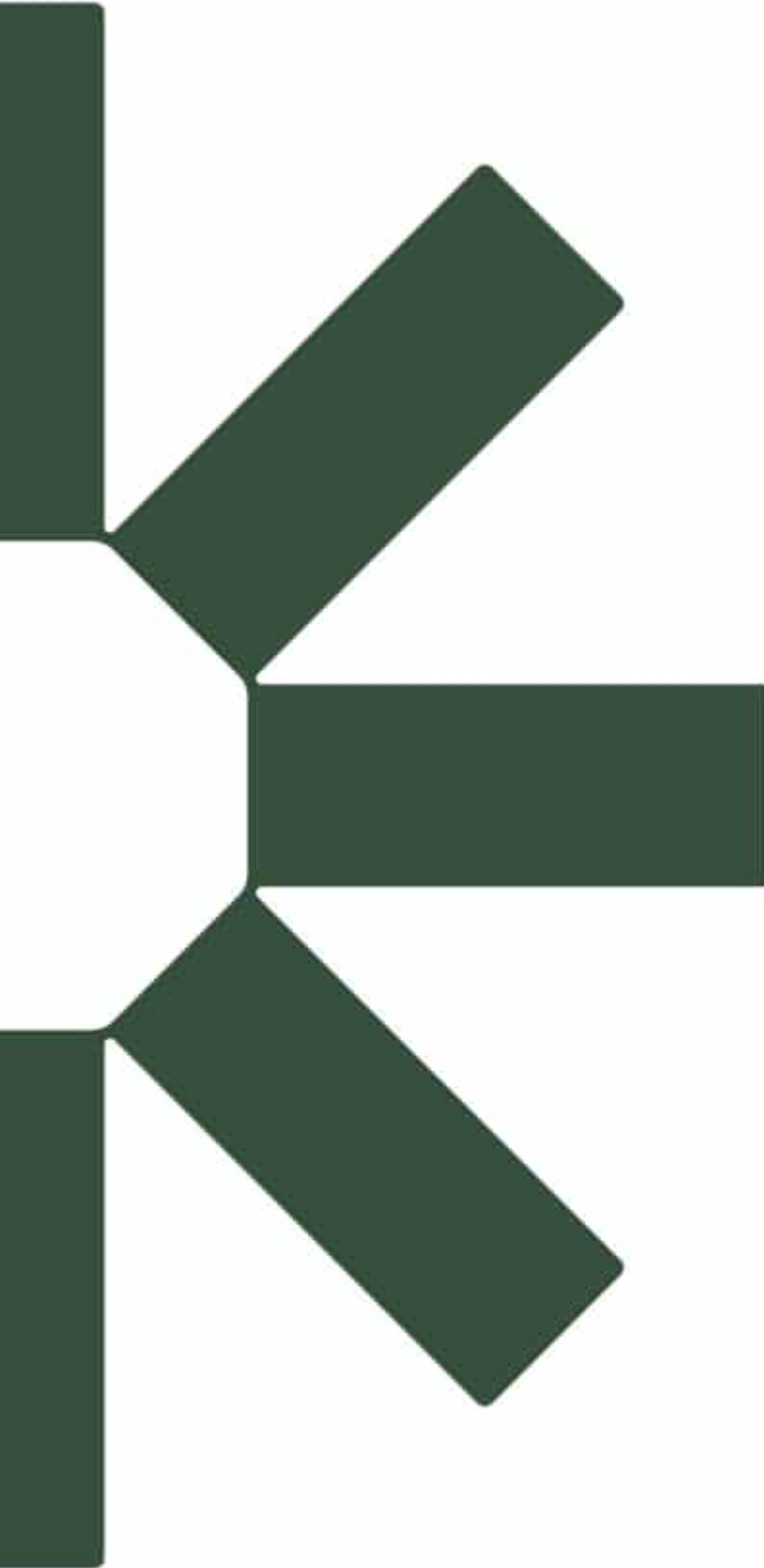
Outcomes

The Tool outputs are being used at the Regulation 19 representation, including feeding into the for the AQ and noise assessments, and then will be included in the development of the planning application.

Planning Authority Response and Status

On-going discussions with LCC around the validity of obtaining trip generation estimates derived from the Vision-led Tool rather than from their current approach.





APPENDIX D- Dunchurch Crossroads traffic data



SITE: 71	 	DATE: 05/06/2024
LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)		DAY: WEDNESDAY



MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 04/06/2024

DAY: TUESDAY

TIME	A TO B						
	FROM A426 (N) TO B4429 (E)						
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL
07:00	39	2	0	0	0	1	1
07:15	47	8	1	0	0	0	1
07:30	51	4	1	0	0	0	0
07:45	41	2	0	1	0	0	0
H/TOT	178	16	2	1	0	1	2
08:00	25	2	1	0	0	0	0
08:15	44	1	0	0	0	0	0
08:30	24	2	2	0	0	0	1
08:45	47	3	0	0	1	0	0
H/TOT	140	8	3	0	1	0	1
09:00	22	4	0	0	1	0	0
09:15	19	1	3	0	0	0	1
09:30	28	2	1	0	0	0	0
09:45	23	1	0	1	0	0	0
H/TOT	92	8	4	1	1	0	1
10:00	23	6	2	1	0	0	0
10:15	18	3	1	0	0	0	0
10:30	17	1	0	0	0	0	0
10:45	18	1	2	0	0	0	0
H/TOT	76	11	5	1	0	0	0
11:00	20	5	2	0	0	0	0
11:15	13	2	1	1	0	0	0
11:30	31	0	1	0	0	0	0
11:45	22	4	1	0	0	0	0
H/TOT	86	11	5	1	0	0	0
12:00	36	2	2	0	0	0	1
12:15	25	2	1	0	0	0	0
12:30	26	1	1	0	0	0	0
12:45	22	2	0	0	0	0	0
H/TOT	109	7	4	0	0	0	1
13:00	25	5	2	0	0	0	0
13:15	28	2	1	1	0	0	0
13:30	28	2	1	0	0	0	0
13:45	27	0	0	0	0	0	0
H/TOT	108	9	4	1	0	0	0
14:00	20	3	0	0	0	0	0
14:15	36	5	0	1	0	0	0
14:30	27	6	0	1	0	0	0
14:45	23	2	0	0	0	0	0
H/TOT	106	16	0	2	0	0	0
15:00	30	0	2	0	0	0	0
15:15	20	3	0	1	0	1	0
15:30	42	4	0	2	1	0	0
15:45	29	2	0	0	0	1	0
H/TOT	121	9	2	3	1	2	0
16:00	37	3	1	0	1	0	0
16:15	36	3	0	1	0	0	0
16:30	23	3	0	0	1	0	0
16:45	49	0	0	0	0	0	0
H/TOT	145	9	1	1	2	0	0
17:00	35	0	0	0	0	0	0
17:15	30	0	0	1	0	0	0
17:30	35	1	0	0	0	1	0
17:45	30	3	0	0	0	0	0
H/TOT	130	4	0	1	0	1	0
18:00	35	6	0	0	1	0	0
18:15	30	2	1	0	0	0	0
18:30	21	1	0	0	0	0	0
18:45	20	0	0	0	0	0	0
H/TOT	106	9	1	0	1	0	0
P/TOT	1397	117	31	12	6	4	5

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 04/06/2024

DAY: TUESDAY

TIME	A TO C						
	FROM A426 (N) TO A426 (S)						
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL
07:00	56	13	2	0	1	0	0
07:15	57	9	5	0	1	0	0
07:30	75	11	2	0	1	0	1
07:45	82	15	4	0	0	1	0
H/TOT	270	48	13	0	3	1	1
08:00	52	3	2	2	0	0	0
08:15	65	8	2	0	0	1	0
08:30	61	4	1	0	0	0	0
08:45	60	1	5	0	1	0	0
H/TOT	238	16	10	2	1	1	0
09:00	36	5	0	1	1	1	0
09:15	24	4	1	1	0	0	0
09:30	24	3	0	0	0	0	0
09:45	26	7	2	0	1	0	0
H/TOT	110	19	3	2	2	1	0
10:00	26	6	1	0	0	0	1
10:15	37	7	2	0	0	0	1
10:30	28	4	3	0	1	0	0
10:45	19	3	1	3	0	0	0
H/TOT	110	20	7	3	1	0	2
11:00	20	7	2	1	1	0	0
11:15	24	1	0	1	0	0	0
11:30	19	6	1	0	0	6	0
11:45	26	2	4	0	1	0	0
H/TOT	89	16	7	2	2	6	0
12:00	30	6	2	0	0	3	0
12:15	24	4	3	0	0	0	1
12:30	25	7	2	0	0	0	1
12:45	16	4	3	0	0	0	0
H/TOT	96	21	10	0	0	3	2
13:00	21	1	1	0	0	0	0
13:15	21	5	0	0	1	0	0
13:30	22	8	3	0	0	0	0
13:45	19	4	2	1	0	0	0
H/TOT	83	18	6	1	1	0	0
14:00	25	2	2	0	1	0	0
14:15	32	4	0	0	0	0	0
14:30	35	3	3	0	0	0	0
14:45	25	5	0	2	0	0	0
H/TOT	117	14	5	2	1	0	0
15:00	36	4	1	0	0	0	0
15:15	25	3	0	0	0	1	0
15:30	35	2	2	2	1	0	0
15:45	42	4	3	0	0	0	0
H/TOT	138	13	6	2	1	1	0
16:00	42	4	1	0	1	1	0
16:15	49	2	2	0	1	1	0
16:30	32	5	1	0	0	0	0
16:45	57	2	1	0	1	0	1
H/TOT	180	13	5	0	3	2	1
17:00	37	4	0	0	0	0	0
17:15	46	3	0	0	0	1	0
17:30	50	3	0	0	0	0	0
17:45	50	2	1	0	1	0	1
H/TOT	183	12	1	0	1	1	1
18:00	41	3	0	0	0	0	0
18:15	35	2	0	0	1	1	0
18:30	30	1	0	1	0	0	1
18:45	27	1	1	0	1	0	0
H/TOT	133	7	1	1	2	1	1
P/TOT	1746	217	74	15	18	17	8

TIME	A TO D						
	FROM A426 (N) TO B4429 (W)						
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL
07:00	58	5	1	1	0	1	0
07:15	68	9	2	0	1	2	0
07:30	68	4	0	0	0	1	0
07:45	52	5	0	0	0	0	0
H/TOT	246	23	3	1	1	4	0
08:00	58	5	0	0	1	0	0
08:15	60	3	2	1	0	0	0
08:30	45	3	1	0	1	0	0
08:45	38	2	3	1	5	0	0
H/TOT	201	13	6	2	7	0	0
09:00	36	1	1	0	0	0	0
09:15	39	8	4	1	0	0	0
09:30	31	5	2	0	0	0	0
09:45	28	2	2	0	0	0	0
H/TOT	134	16	9	1	0	0	0
10:00	28	4	1	0	0	0	0
10:15	21	2	1	0	0	0	0
10:30	24	3	2	0	0	0	0
10:45	23	4	0	0	0	0	0
H/TOT	96	13	4	0	0	0	0
11:00	23	2	3	1	0	0	0
11:15	29	4	0	1	0	1	0
11:30	22	5	2	0	0	0	0
11:45	24	7	1	0	1	0	0
H/TOT	98	18	6	2	1	1	0
12:00	20	6	0	0	0	0	0
12:15	25	8	0	0	0	0	0
12:30	21	4	3	0	0	0	0
12:45	15	5	0	2	0	0	0
H/TOT	81	23	3	2	0	0	0
13:00	35	6	0	0	0	2	0
13:15	29	3	0	0	0	0	0
13:30	22	7	0	1	0	0	0
13:45	17	5	1	1	1	0	0
H/TOT	103	21	1	2	1	2	0
14:00	22	2	2	0	0	0	0
14:15	22	2	1	2	0	0	0
14:30	24	3	0	1	0	0	0
14:45	18	1	1	1	0	0	0
H/TOT	86	8	4	4	0	0	0
15:00	31	4	1	1	0	0	0
15:15	24	4	0	0	0	0	0
15:30	35	6	0	0	1	0	1
15:45	45	1	1	0	0	0	0
H/TOT	135	15	2	1	1	0	1
16:00	42	5	1	1	2	0	0
16:15	42	8	0	0	1	0	0
16:30	36	10	1	0	0	0	0
16:45	53	7	1	0	0	0	0
H/TOT	173	30	3	1	3	0	0
17:00	44	3	0	0	0	0	0
17:15	38	2	0	0	0	0	0
17:30	41	3	0	0	0	0	0
17:45	44	2	0	0	1	0	0
H/TOT	167	10	0	0	1	0	0
18:00	34	1	0	1	0	0	0
18:15	43	0	1	0	1	0	0
18:30	33	0	1	0	1	0	0
18:45	42	3	0	0	0	1	0
H/TOT	152	4	2	1	2	1	0
P/TOT	1672	194	43	17	17	8	1

B TO A							
FROM B4429 (E) TO A426 (N)							
CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
12	3	0	0	0	1	0	16
25	3	1	0	2	0	0	31
33	3	2	0	0	1	0	39
38	3	2	0	1	0	0	44
108	12	5	0	3	2	0	130
42	3	0	0	1	0	0	46
44	4	2	1	1	0	0	52
30	4	1	1	0	1	0	37
24	4	0	0	0	0	0	28
140	15	3	2	2	1	0	163
34	2	0	0	0	0	0	36
33	2	1	0	0	0	0	36
17	1	0	0	0	0	0	18
26	1	2	0	0	0	0	29
110	6	3	0	0	0	0	119
24	4	0	0	0	0	0	28
24	0	2	1	0	0	2	29
22	1	3	0	0	0	0	26
25	4	1	1	0	0	0	31
95	9	6	2	0	0	2	114
30	4	2	0	0	0	0	36
25	3	2	0	0	0	0	30
23	4	0	1	0	0	1	29
24	2	2	0	0	1	0	29
102	13	6	1	0	1	1	124
30	2	2	0	0	0	0	34
29	4	2	0	0	0	0	35
23	3	1	2	0	0	0	29
32	1	2	2	0	1	0	38
114	10	7	4	0	1	0	136
21	3	0	1	0	0	0	25
37	1	2	0	0	0	0	40
18	1	0	1	0	0	0	21
24	3	2	0	0	0	0	29
100	8	4	2	0	1	0	115
34	2	1	1	0	0	1	39
41	4	1	0	0	0	0	46
39	0	1	0	1	0	0	41
35	2	2	1	0	0	0	40
149	8	5	2	1	0	1	166
45	4	2	0	0	2	0	53
39	4	2	0	0	0	0	45
40	6	2	0	0	1	0	49
27	1	0	0	0	1	0	29
151	15	6	0	0	4	0	176
35	1	1	0	0	0	0	37
41	2	0	0	0	0	0	43
46	3	1	0	0	0	0	50
48	0	3	0	0	1	0	52
170	6	5	0	0	1	0	182
45	4	1	0	0	2	0	52
57	1	0	0	0	0	0	58
55	3	1	0	0	0	0	59
53	4	0	0	0	0	0	57
210	12	2	0	0	2	0	226
30	2	1	0	0	1	2	36
34	0	0	0	0	1	0	35
29	1	0	0	0	0	0	30
38	3	0	0	0	0	0	41
131	6	1	0	0	2	2	142
1580	120	53	13	6	15	6	1793

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 04/06/2024

DAY: TUESDAY

TIME	B TO C							
	FROM B4429 (E) TO A426 (S)							
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
07:00	3	0	0	0	0	0	0	3
07:15	2	1	0	1	0	0	0	4
07:30	2	2	1	1	0	0	0	6
07:45	5	1	0	0	0	0	0	6
H/TOT	12	4	1	2	0	0	0	19
08:00	2	2	0	0	0	0	0	4
08:15	4	1	0	2	0	0	0	7
08:30	12	1	0	0	0	0	0	13
08:45	5	0	0	0	0	0	0	5
H/TOT	23	4	0	2	0	0	0	29
09:00	6	3	1	1	0	0	0	11
09:15	0	0	0	0	0	0	0	0
09:30	5	0	0	0	0	0	0	5
09:45	1	0	0	0	0	0	0	1
H/TOT	12	3	1	1	0	0	0	17
10:00	3	0	1	0	0	0	0	4
10:15	5	1	1	0	0	0	0	7
10:30	1	1	0	0	0	0	0	2
10:45	2	2	0	1	0	0	0	5
H/TOT	11	4	2	1	0	0	0	18
11:00	2	2	0	0	0	1	0	5
11:15	4	0	1	0	1	0	0	6
11:30	1	2	0	0	0	0	0	3
11:45	5	0	0	0	0	0	0	5
H/TOT	12	4	1	0	1	1	0	19
12:00	8	1	0	0	0	0	0	9
12:15	7	0	0	0	0	0	0	7
12:30	6	1	0	0	0	0	0	7
12:45	4	0	1	0	0	0	0	5
H/TOT	25	2	1	0	0	0	0	28
13:00	4	1	1	0	0	0	0	6
13:15	3	1	0	0	0	0	0	4
13:30	5	0	0	0	0	0	0	5
13:45	5	0	0	0	0	0	0	5
H/TOT	17	2	1	0	0	0	0	20
14:00	6	0	0	0	0	0	0	6
14:15	3	0	0	0	0	0	0	3
14:30	2	1	0	0	0	0	0	3
14:45	4	2	0	0	0	0	0	6
H/TOT	15	3	0	0	0	0	0	18
15:00	5	0	1	0	0	0	0	6
15:15	8	0	0	0	0	0	0	8
15:30	1	1	0	1	0	0	0	3
15:45	3	0	0	2	0	0	0	5
H/TOT	17	1	1	3	0	0	0	22
16:00	6	2	1	1	0	0	0	10
16:15	9	1	0	1	0	0	0	11
16:30	5	0	0	0	0	0	0	5
16:45	6	1	0	0	0	0	0	7
H/TOT	26	4	1	2	0	0	0	33
17:00	5	0	1	0	0	0	0	6
17:15	5	0	0	0	1	0	0	6
17:30	3	1	0	0	0	0	0	4
17:45	3	0	0	0	0	0	0	3
H/TOT	16	1	1	0	1	0	0	19
18:00	2	0	0	0	0	0	0	2
18:15	3	0	0	0	0	0	0	3
18:30	1	0	1	0	0	0	0	2
18:45	6	0	0	0	0	0	1	7
H/TOT	12	0	1	0	0	0	1	14
P/TOT	198	32	11	11	2	1	1	256

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 04/06/2024

DAY: TUESDAY

TIME	B TO D							
	FROM B4429 (E) TO B4429 (W)							
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
07:00	4	0	0	0	0	0	0	4
07:15	3	0	0	0	0	0	0	3
07:30	1	0	0	0	0	0	0	1
07:45	6	1	0	0	0	0	0	7
H/TOT	14	1	0	0	0	0	0	15
08:00	13	1	0	1	0	0	0	15
08:15	6	2	0	0	0	0	0	8
08:30	7	4	0	0	0	0	0	11
08:45	2	0	0	1	0	1	0	4
H/TOT	28	7	0	2	0	1	0	38
09:00	3	1	0	0	0	0	0	4
09:15	6	3	0	0	0	0	0	9
09:30	2	0	0	0	0	0	0	2
09:45	3	3	0	0	0	0	0	6
H/TOT	14	7	0	0	0	0	0	21
10:00	2	1	0	0	0	0	0	3
10:15	1	1	0	0	0	0	0	2
10:30	6	1	1	0	0	0	0	8
10:45	4	0	1	0	0	0	0	5
H/TOT	13	3	2	0	0	0	0	18
11:00	2	0	0	0	0	0	0	2
11:15	7	0	0	0	0	0	0	7
11:30	3	1	0	0	0	0	0	4
11:45	6	0	1	0	0	0	0	7
H/TOT	18	1	1	0	0	0	0	20
12:00	5	0	0	0	0	0	0	5
12:15	6	1	0	0	0	0	0	7
12:30	3	1	1	0	0	0	0	5
12:45	2	1	1	0	0	0	0	4
H/TOT	16	3	2	0	0	0	0	21
13:00	4	1	0	0	0	0	0	5
13:15	4	1	1	0	0	0	0	6
13:30	7	0	0	0	0	0	0	7
13:45	4	1	1	0	0	0	0	6
H/TOT	19	3	2	0	0	0	0	24
14:00	6	2	1	0	0	0	0	9
14:15	2	0	1	1	0	0	0	4
14:30	2	1	0	0	0	0	0	3
14:45	3	1	0	0	0	0	0	4
H/TOT	13	4	2	1	0	0	0	20
15:00	4	0	0	0	0	1	0	5
15:15	5	1	0	0	0	0	0	6
15:30	5	0	0	0	0	0	0	5
15:45	8	1	0	0	0	0	0	9
H/TOT	22	2	0	0	0	1	0	25
16:00	6	1	0	1	0	0	0	8
16:15	10	1	0	0	0	0	0	11
16:30	11	0	0	0	1	0	0	12
16:45	11	2	0	0	0	0	0	13
H/TOT	38	4	0	1	1	0	0	44
17:00	19	0	0	1	0	1	0	21
17:15	21	2	0	0	0	0	0	23
17:30	16	3	0	0	0	0	0	19
17:45	8	0	0	0	0	0	0	8
H/TOT	64	5	0	1	0	1	0	71
18:00	7	0	0	1	0	0	0	8
18:15	1	0	1	0	0	0	0	2
18:30	2	0	0	0	0	0	0	2
18:45	9	0	0	0	0	0	0	9
H/TOT	19	0	1	1	0	0	0	21
P/TOT	278	40	10	6	1	3	0	338

TIME	C TO A							
	FROM A426 (S) TO A426 (N)							TOT
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	
07:00	27	5	0	2	1	0	0	35
07:15	32	5	1	1	1	0	0	40
07:30	46	3	2	0	2	1	0	54
07:45	61	7	2	2	2	0	0	74
H/TOT	166	20	5	5	6	1	0	203
08:00	66	2	3	0	1	1	1	74
08:15	60	1	0	0	0	1	0	62
08:30	52	6	1	0	1	0	0	60
08:45	73	5	0	0	1	0	1	80
H/TOT	251	14	4	0	3	2	2	276
09:00	43	4	1	2	0	0	0	50
09:15	24	4	0	0	1	0	0	29
09:30	33	4	1	2	0	0	0	40
09:45	31	1	3	0	0	0	0	35
H/TOT	131	13	5	4	1	0	0	154
10:00	31	4	3	0	1	0	0	39
10:15	28	9	1	0	0	0	0	38
10:30	29	1	5	1	1	0	0	37
10:45	29	4	2	1	0	0	0	36
H/TOT	117	18	11	2	2	0	0	150
11:00	27	10	0	0	0	0	1	38
11:15	35	7	1	0	1	0	0	44
11:30	37	5	3	2	1	0	0	48
11:45	32	5	2	0	0	0	0	39
H/TOT	131	27	6	2	2	0	1	169
12:00	24	4	1	1	0	0	0	30
12:15	37	15	1	0	0	0	0	53
12:30	33	5	2	2	1	0	0	43
12:45	33	5	1	1	0	0	0	40
H/TOT	127	29	5	4	1	0	0	166
13:00	19	2	0	0	0	0	0	21
13:15	32	4	1	2	1	0	1	41
13:30	35	2	1	0	0	0	0	38
13:45	27	5	1	0	0	0	0	33
H/TOT	113	13	3	2	1	0	1	133
14:00	28	7	1	1	0	0	0	37
14:15	30	6	3	0	0	0	0	39
14:30	37	3	0	1	2	0	0	43
14:45	31	4	2	0	0	0	0	37
H/TOT	126	20	6	2	2	0	0	156
15:00	30	4	3	0	0	0	0	37
15:15	64	8	0	0	0	0	0	72
15:30	61	6	6	1	0	0	0	74
15:45	68	11	3	1	0	0	0	83
H/TOT	223	29	12	2	0	0	0	266
16:00	31	11	0	0	1	0	0	43
16:15	55	4	0	0	0	0	0	59
16:30	64	17	0	1	1	0	0	83
16:45	64	3	2	0	0	0	0	69
H/TOT	214	35	2	1	2	0	0	254
17:00	85	12	0	0	2	0	1	100
17:15	82	11	0	0	0	0	0	93
17:30	79	3	0	0	0	0	0	82
17:45	73	4	1	0	0	1	0	79
H/TOT	319	30	1	0	2	1	1	354
18:00	64	3	0	0	0	0	0	67
18:15	69	5	0	0	1	2	0	77
18:30	55	2	0	0	0	0	0	57
18:45	40	3	2	0	0	0	0	45
H/TOT	228	13	2	0	1	2	0	246
P/TOT	2146	261	62	24	23	6	5	2527

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 04/06/2024

DAY: TUESDAY

TIME	C TO D							
	FROM A426 (S) TO B4429 (W)							
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
07:00	3	0	1	0	0	0	0	4
07:15	6	0	0	0	0	0	0	6
07:30	5	1	0	0	0	0	0	6
07:45	7	1	0	0	0	0	0	8
H/TOT	21	2	1	0	0	0	0	24
08:00	6	1	0	0	0	0	0	7
08:15	4	0	0	0	0	0	0	4
08:30	6	0	0	0	0	0	0	6
08:45	7	1	0	0	0	0	0	8
H/TOT	23	2	0	0	0	0	0	25
09:00	8	2	0	0	0	0	0	10
09:15	3	0	0	1	0	0	0	4
09:30	3	0	0	0	0	1	0	4
09:45	7	1	0	0	1	0	0	9
H/TOT	21	3	0	1	1	1	0	27
10:00	1	2	0	0	0	0	0	3
10:15	4	1	0	0	0	0	0	5
10:30	5	0	0	2	0	0	0	7
10:45	5	0	1	0	0	0	0	6
H/TOT	15	3	1	2	0	0	0	21
11:00	3	3	0	1	0	0	0	7
11:15	4	2	0	0	0	0	0	6
11:30	3	0	0	0	0	0	0	3
11:45	3	1	0	0	0	1	0	5
H/TOT	13	6	0	1	0	1	0	21
12:00	2	3	0	1	0	0	0	6
12:15	3	3	0	1	0	0	0	7
12:30	3	0	0	0	0	0	0	3
12:45	8	0	0	0	0	0	0	8
H/TOT	16	6	0	2	0	0	0	24
13:00	6	0	0	2	0	0	0	8
13:15	6	1	0	0	0	0	0	7
13:30	4	2	0	0	0	0	0	6
13:45	5	2	1	0	0	0	0	8
H/TOT	21	5	1	2	0	0	0	29
14:00	5	4	0	0	0	0	0	9
14:15	3	1	0	0	0	0	0	4
14:30	6	1	0	0	0	0	0	7
14:45	6	1	0	0	0	0	0	7
H/TOT	20	7	0	0	0	0	0	27
15:00	4	1	1	2	0	0	0	8
15:15	8	1	0	0	0	0	0	9
15:30	6	1	0	0	0	0	0	7
15:45	4	0	0	0	0	0	0	4
H/TOT	22	3	1	2	0	0	0	28
16:00	10	3	0	0	0	0	0	13
16:15	6	0	0	0	0	0	0	6
16:30	10	1	0	2	0	0	0	13
16:45	4	0	0	1	0	0	0	5
H/TOT	30	4	0	3	0	0	0	37
17:00	10	4	0	0	0	0	0	14
17:15	8	0	0	0	0	0	0	8
17:30	4	1	0	0	0	0	0	5
17:45	8	1	0	0	0	0	0	9
H/TOT	30	6	0	0	0	0	0	36
18:00	3	0	0	1	0	0	0	4
18:15	6	0	0	0	0	0	0	6
18:30	7	0	0	0	0	0	0	7
18:45	10	0	0	0	0	0	0	10
H/TOT	26	0	0	1	0	0	0	27
P/TOT	258	47	4	14	1	2	0	325

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 04/06/2024

DAY: TUESDAY

TIME	D TO A							
	FROM B4429 (W) TO A426 (N)							
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
07:00	36	7	0	0	0	0	0	43
07:15	41	8	2	1	0	0	0	52
07:30	45	9	2	2	0	0	0	58
07:45	64	15	3	1	0	0	0	83
H/TOT	186	39	7	4	0	0	0	236
08:00	59	5	1	0	3	0	0	68
08:15	52	9	4	0	1	0	0	66
08:30	50	7	3	0	1	0	0	61
08:45	42	7	3	0	1	0	0	53
H/TOT	248	38	11	0	6	0	0	295
09:00	34	10	2	1	0	0	0	47
09:15	23	7	3	1	0	0	0	34
09:30	19	6	0	0	0	0	0	25
09:45	24	4	2	2	0	0	0	32
H/TOT	100	27	7	4	0	0	0	138
10:00	24	4	2	0	0	0	0	30
10:15	20	4	0	0	0	0	0	24
10:30	23	3	3	1	0	0	0	30
10:45	21	3	4	0	0	0	1	29
H/TOT	88	14	9	1	0	0	1	113
11:00	17	5	2	1	1	0	0	26
11:15	38	4	2	0	0	0	0	44
11:30	30	5	1	0	0	0	1	37
11:45	26	7	1	0	0	0	0	34
H/TOT	111	21	6	1	1	0	1	141
12:00	32	2	2	0	0	0	0	36
12:15	20	4	0	1	0	0	0	25
12:30	37	6	1	1	0	0	0	45
12:45	39	11	0	1	0	0	0	51
H/TOT	128	23	3	3	0	0	0	157
13:00	27	0	0	0	1	0	0	28
13:15	23	5	0	0	0	0	0	28
13:30	38	3	2	1	0	0	0	44
13:45	28	4	1	1	0	0	0	34
H/TOT	116	12	3	2	1	0	0	134
14:00	29	3	3	1	0	0	0	36
14:15	44	3	1	1	1	0	0	50
14:30	35	0	1	0	0	0	0	36
14:45	37	3	3	1	0	0	0	44
H/TOT	145	9	8	3	1	0	0	166
15:00	37	7	1	0	0	0	0	45
15:15	44	1	0	1	1	0	0	47
15:30	57	7	2	0	1	0	0	67
15:45	52	6	1	0	0	0	0	59
H/TOT	190	21	4	1	2	0	0	218
16:00	66	7	0	0	0	0	0	73
16:15	63	7	2	0	1	0	0	73
16:30	80	8	0	0	0	1	0	89
16:45	86	12	0	0	0	0	0	98
H/TOT	295	34	2	0	1	1	0	333
17:00	70	4	0	0	1	0	0	75
17:15	93	5	2	0	1	0	0	101
17:30	91	7	0	0	0	0	0	98
17:45	85	6	0	0	1	1	0	93
H/TOT	339	22	2	0	3	1	0	367
18:00	58	7	0	0	0	0	0	65
18:15	62	5	1	0	1	0	0	69
18:30	40	1	0	0	0	0	0	41
18:45	30	3	0	0	0	0	0	33
H/TOT	190	16	1	0	1	0	0	208
P/TOT	2091	266	63	19	16	2	2	2459

TIME	D TO B							
	FROM B4429 (W) TO B4429 (E)							
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
07:00	2	1	0	0	0	0	0	3
07:15	2	0	0	0	0	0	0	2
07:30	5	1	0	0	0	0	0	6
07:45	3	3	0	1	0	1	0	8
H/TOT	12	5	0	1	0	1	0	19
08:00	12	1	0	0	0	0	0	13
08:15	8	2	0	0	0	0	0	10
08:30	5	1	0	0	0	0	0	6
08:45	11	0	2	0	0	0	0	13
H/TOT	36	4	2	0	0	0	0	42
09:00	9	2	0	0	0	0	0	11
09:15	4	1	0	0	0	0	0	5
09:30	2	1	0	0	0	0	0	3
09:45	5	1	0	0	0	0	0	6
H/TOT	20	5	0	0	0	0	0	25
10:00	5	0	0	0	0	0	0	5
10:15	1	0	0	0	0	0	0	1
10:30	3	1	0	0	0	0	0	4
10:45	3	0	0	0	0	0	0	3
H/TOT	12	1	0	0	0	0	0	13
11:00	1	1	0	0	0	0	0	2
11:15	2	0	0	0	0	0	0	2
11:30	11	1	0	0	0	0	0	12
11:45	6	2	2	0	0	0	0	10
H/TOT	20	4	2	0	0	0	0	26
12:00	4	0	0	0	0	0	0	4
12:15	6	0	0	0	0	1	0	7
12:30	6	0	1	0	0	0	0	7
12:45	6	0	0	0	0	0	0	6
H/TOT	22	0	1	0	0	1	0	24
13:00	3	2	0	0	0	1	0	6
13:15	6	0	1	0	0	1	0	8
13:30	3	2	0	1	0	0	0	6
13:45	4	3	0	1	0	0	0	8
H/TOT	16	7	1	2	0	2	0	28
14:00	2	0	0	0	0	0	0	2
14:15	3	0	0	0	0	0	0	3
14:30	6	0	0	0	0	0	0	6
14:45	10	3	1	0	0	0	0	14
H/TOT	21	3	1	0	0	0	0	25
15:00	11	1	0	0	0	0	0	12
15:15	7	1	0	1	0	0	0	9
15:30	14	3	0	0	0	0	0	17
15:45	9	3	1	0	0	0	0	13
H/TOT	41	8	1	1	0	0	0	51
16:00	12	1	0	1	0	0	0	14
16:15	2	2	0	0	0	0	0	4
16:30	10	3	0	0	0	0	0	13
16:45	9	2	0	1	0	0	0	12
H/TOT	33	8	0	2	0	0	0	43
17:00	8	2	0	1	0	0	0	11
17:15	9	1	0	0	0	0	0	10
17:30	14	0	0	0	0	0	0	14
17:45	4	0	0	0	0	0	0	4
H/TOT	35	3	0	1	0	0	0	39
18:00	8	0	0	0	0	0	0	8
18:15	2	0	1	0	0	0	0	3
18:30	6	0	0	0	0	0	0	6
18:45	3	0	0	0	0	0	0	3
H/TOT	19	0	1	0	0	0	0	20
P/TOT	287	48	9	7	0	4	0	355

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 04/06/2024

DAY: TUESDAY

TIME	TO ARM A A426 (N)							
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
07:00	75	15	0	2	1	1	0	94
07:15	98	16	4	2	3	0	0	123
07:30	124	15	6	2	2	2	0	151
07:45	163	25	7	3	3	0	0	201
H/TOT	460	71	17	9	9	3	0	569
08:00	167	10	4	0	5	1	1	188
08:15	156	14	6	1	2	1	0	180
08:30	132	17	5	1	2	1	0	158
08:45	139	16	3	0	2	0	1	161
H/TOT	594	57	18	2	11	3	2	687
09:00	111	16	3	3	0	0	0	133
09:15	80	13	4	1	1	0	0	99
09:30	69	11	1	2	0	0	0	83
09:45	81	6	7	2	0	0	0	96
H/TOT	341	46	15	8	1	0	0	411
10:00	79	12	5	0	1	0	0	97
10:15	72	13	3	1	0	0	2	91
10:30	74	5	11	2	1	0	0	93
10:45	75	11	7	2	0	0	1	96
H/TOT	300	41	28	5	2	0	3	377
11:00	74	19	4	1	1	0	1	100
11:15	98	14	5	0	1	0	0	118
11:30	90	14	4	3	1	0	2	114
11:45	82	14	5	0	0	1	0	102
H/TOT	344	61	18	4	3	1	3	434
12:00	86	9	5	1	0	0	0	100
12:15	86	23	3	1	0	0	0	113
12:30	93	14	4	5	1	0	0	117
12:45	104	17	3	4	0	1	0	129
H/TOT	369	62	15	11	1	1	0	459
13:00	67	5	0	1	1	0	0	74
13:15	92	10	3	2	1	0	1	109
13:30	91	6	3	2	0	1	0	103
13:45	79	12	4	1	0	0	0	96
H/TOT	329	33	10	6	2	1	1	382
14:00	91	12	5	3	0	0	1	112
14:15	115	13	5	1	1	0	0	135
14:30	111	3	2	1	3	0	0	120
14:45	103	9	7	2	0	0	0	121
H/TOT	420	37	19	7	4	0	1	468
15:00	112	15	6	0	0	2	0	135
15:15	147	13	2	1	1	0	0	164
15:30	158	19	10	1	1	1	0	190
15:45	147	18	4	1	0	1	0	171
H/TOT	564	65	22	3	2	4	0	660
16:00	132	19	1	0	1	0	0	153
16:15	159	13	2	0	1	0	0	175
16:30	190	28	1	1	1	1	0	222
16:45	198	15	5	0	0	1	0	219
H/TOT	679	75	9	1	3	2	0	769
17:00	200	20	1	0	3	2	1	227
17:15	232	17	2	0	1	0	0	252
17:30	225	13	1	0	0	0	0	239
17:45	211	14	1	0	1	2	0	229
H/TOT	868	64	5	0	5	4	1	947
18:00	152	12	1	0	0	1	2	168
18:15	165	10	1	0	2	3	0	181
18:30	124	4	0	0	0	0	0	128
18:45	108	9	2	0	0	0	0	119
H/TOT	549	35	4	0	2	4	2	596
P/TOT	5817	647	178	56	45	23	13	6779

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 04/06/2024

DAY: TUESDAY

FROM ARM A A426 (N)							
CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
153	20	3	1	1	2	1	181
172	26	8	0	2	2	1	211
194	19	3	0	1	1	1	219
175	22	4	1	0	1	0	203
694	87	18	2	4	6	3	814
135	10	3	2	1	0	0	151
169	12	4	1	0	1	0	187
130	9	4	0	1	0	1	145
145	6	8	1	7	0	0	167
579	37	19	4	9	1	1	650
94	10	1	1	2	1	0	109
82	13	8	2	0	0	1	106
83	10	3	0	0	0	0	96
77	10	4	1	1	0	0	93
326	43	16	4	3	1	1	404
77	16	4	1	0	0	1	99
76	12	4	0	0	0	1	93
69	8	5	0	1	0	0	83
60	8	3	3	0	0	0	74
282	44	16	4	1	0	2	349
63	14	7	2	1	0	0	87
96	7	1	3	0	1	0	78
72	11	4	0	0	6	0	93
72	13	6	0	2	0	0	93
273	45	18	5	3	7	0	351
96	14	4	0	0	3	1	108
74	14	4	0	0	0	1	93
72	12	6	0	0	0	1	91
53	11	3	2	0	0	0	69
285	51	17	2	0	3	3	361
81	12	3	0	0	2	0	96
78	10	1	1	1	0	0	91
72	17	4	1	0	0	0	94
63	9	3	2	1	0	0	78
294	48	11	4	2	2	0	361
67	7	4	0	1	0	0	79
90	11	1	3	0	0	0	105
86	12	3	2	0	0	0	103
66	8	1	3	0	0	0	78
309	38	9	8	1	0	0	365
97	8	4	1	0	0	0	110
69	10	0	1	0	2	0	82
112	12	2	4	3	0	1	134
116	7	4	0	0	1	0	128
394	37	10	6	3	3	1	454
121	12	3	1	4	1	0	142
127	13	2	1	2	1	0	146
91	18	2	0	1	0	0	112
159	9	2	0	1	0	1	172
488	52	9	2	8	2	1	572
116	7	0	0	0	0	0	123
114	5	0	1	0	1	0	121
126	7	0	0	0	1	0	134
124	7	1	0	2	0	1	135
480	26	1	1	2	2	1	513
110	10	0	1	1	0	0	122
108	4	2	0	2	1	0	117
84	2	1	1	1	0	1	90
89	4	1	0	1	1	0	96
391	20	4	2	5	2	1	425
4815	528	148	44	41	29	14	5619

TIME	TO ARM B B4429 (E)							
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
07:00	45	3	0	0	0	1	1	50
07:15	52	8	1	0	0	0	1	62
07:30	57	5	1	0	0	0	0	63
07:45	47	5	0	2	0	1	0	55
H/TOT	201	21	2	2	0	2	2	230
08:00	41	5	1	0	0	0	0	47
08:15	56	3	0	0	0	0	0	59
08:30	35	3	2	0	0	0	1	41
08:45	66	5	3	0	1	0	0	75
H/TOT	198	16	6	0	1	0	1	222
09:00	35	6	1	0	1	0	0	43
09:15	23	3	3	0	0	0	1	30
09:30	30	3	1	0	1	0	0	35
09:45	33	2	0	1	0	0	0	36
H/TOT	121	14	5	1	2	0	1	144
10:00	32	6	2	1	0	0	0	41
10:15	20	4	1	0	0	0	0	25
10:30	22	3	1	0	0	0	0	26
10:45	23	2	3	0	0	0	0	28
H/TOT	87	15	7	1	0	0	0	120
11:00	26	7	2	0	0	0	0	35
11:15	18	4	1	1	0	0	0	24
11:30	45	2	1	0	0	1	0	49
11:45	31	6	3	0	0	0	0	40
H/TOT	120	19	7	1	0	1	0	148
12:00	42	3	2	0	0	0	1	48
12:15	37	3	2	0	0	1	0	43
12:30	37	3	2	0	0	1	0	43
12:45	31	3	0	0	0	0	0	34
H/TOT	147	12	6	0	0	2	1	168
13:00	31	10	2	0	0	1	0	44
13:15	37	2	2	1	0	1	0	43
13:30	35	5	2	1	0	0	0	43
13:45	33	5	0	1	0	0	0	39
H/TOT	136	22	6	3	0	2	0	169
14:00	22	4	0	0	0	0	0	26
14:15	40	5	0	1	0	0	0	46
14:30	38	6	0	1	0	0	0	45
14:45	37	5	1	0	0	0	0	43
H/TOT	137	20	1	2	0	0	0	160
15:00	42	1	2	1	0	0	0	46
15:15	29	6	0	2	0	1	0	38
15:30	65	7	0	2	2	0	0	76
15:45	42	6	1	0	0	1	0	50
H/TOT	178	20	3	5	2	2	0	210
16:00	55	7	1	1	1	0	0	65
16:15	43	6	0	1	0	0	0	50
16:30	36	7	1	0	1	0	0	45
16:45	63	3	0	2	0	0	0	68
H/TOT	197	23	2	4	2	0	0	228
17:00	49	2	0	1	0	0	0	52
17:15	42	2	0	1	0	0	0	45
17:30	52	3	1	0	0	1	0	57
17:45	36	3	0	0	0	0	0	39
H/TOT	179	10	1	2	0	1	0	193
18:00	43	6	0	0	1	0	0	50
18:15	35	2	2	0	0	0	0	39
18:30	29	1	0	0	0	0	0	30
18:45	27	0	0	0	0	0	0	27
H/TOT	134	9	2	0	1	0	0	146
P/TOT	1845	201	48	21	8	10	5	2138

FROM ARM B B4429 (

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 04/06/2024

DAY: TUESDAY

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 04/06/2024

DAY: TUESDAY

TIME	TO ARM C A426 (S)							
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
07:00	62	14	2	0	1	0	0	79
07:15	68	11	6	1	1	0	0	87
07:30	91	17	6	1	1	0	1	117
07:45	100	18	4	1	0	1	0	124
H/TOT	321	60	18	3	3	1	1	407
08:00	70	8	3	2	0	0	0	83
08:15	84	13	3	2	0	1	0	103
08:30	106	6	2	0	0	0	0	114
08:45	87	3	5	0	1	0	0	96
H/TOT	347	30	13	4	1	1	0	396
09:00	57	12	1	2	1	1	0	74
09:15	28	4	2	1	0	0	0	35
09:30	43	5	0	0	0	0	0	48
09:45	44	7	3	3	1	0	0	58
H/TOT	172	28	6	6	2	1	0	215
10:00	39	10	2	0	0	0	1	52
10:15	47	9	3	1	0	1	1	62
10:30	39	5	3	0	1	0	0	48
10:45	31	7	1	4	0	0	0	43
H/TOT	156	31	9	5	1	1	2	205
11:00	35	10	4	1	1	1	0	52
11:15	37	4	1	1	1	0	0	44
11:30	26	9	1	0	0	6	0	42
11:45	37	3	4	1	1	0	0	46
H/TOT	135	26	10	3	3	7	0	184
12:00	48	13	2	0	0	3	0	66
12:15	35	4	3	0	0	0	1	43
12:30	39	11	3	0	0	0	1	54
12:45	25	4	4	0	0	0	0	33
H/TOT	147	32	12	0	0	3	2	196
13:00	33	7	3	0	0	0	0	43
13:15	31	8	0	0	1	1	0	41
13:30	31	8	5	0	0	0	0	44
13:45	33	4	2	1	0	0	0	40
H/TOT	128	27	10	1	1	1	0	168
14:00	36	4	2	0	1	0	0	43
14:15	44	6	0	0	0	0	0	50
14:30	41	4	3	0	0	0	0	48
14:45	40	11	2	3	0	0	0	56
H/TOT	161	25	7	3	1	0	0	197
15:00	67	6	2	0	0	0	0	75
15:15	45	7	0	0	0	1	0	53
15:30	40	3	2	4	1	0	0	50
15:45	53	4	3	2	0	0	0	62
H/TOT	205	20	7	6	1	1	0	240
16:00	63	6	2	1	1	1	0	74
16:15	68	4	2	1	2	1	0	78
16:30	48	6	1	0	1	0	0	56
16:45	78	4	1	0	1	0	1	85
H/TOT	257	20	6	2	5	2	1	293
17:00	56	7	1	0	0	0	0	64
17:15	71	5	0	0	1	1	0	78
17:30	68	7	0	0	0	0	0	75
17:45	69	2	1	0	1	0	1	74
H/TOT	264	21	2	0	2	1	1	291
18:00	55	4	0	0	0	0	0	59
18:15	48	3	0	0	1	1	0	53
18:30	35	2	2	1	0	0	1	41
18:45	43	2	1	0	1	0	1	48
H/TOT	181	11	3	1	2	1	2	201
P/TOT	2474	331	103	34	22	20	9	2993

FROM ARM C A426 (S)							
CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
34	5	1	2	1	0	0	43
41	5	1	1	1	0	0	49
52	4	2	0	2	1	0	61
71	8	2	2	2	0	0	85
198	22	6	5	6	1	0	238
76	5	3	0	1	1	1	87
68	1	0	0	0	1	0	70
64	6	1	0	1	0	0	72
88	8	1	0	1	0	1	99
296	20	5	0	3	2	2	328
55	6	2	2	0	0	0	65
27	5	0	1	1	0	0	34
36	4	1	2	1	1	0	45
43	2	3	0	1	0	0	49
161	17	6	5	3	1	0	193
36	6	3	0	1	0	0	46
33	11	1	0	0	0	0	45
36	2	6	3	1	0	0	48
36	5	4	1	0	0	0	46
141	24	14	4	2	0	0	185
35	14	0	1	0	0	1	51
42	11	1	0	1	0	0	55
43	6	3	2	1	1	0	56
38	6	2	0	0	1	0	47
158	37	6	3	2	2	1	208
28	6	1	2	0	0	0	35
46	19	2	1	0	0	0	68
41	7	2	2	1	1	0	54
44	6	1	1	0	0	0	52
159	40	6	6	1	1	0	213
28	5	0	2	0	0	0	35
41	5	1	2	1	0	1	51
43	5	2	0	0	0	0	50
34	9	2	0	0	0	0	45
146	24	5	4	1	0	1	181
33	12	1	1	0	0	0	47
34	7	3	0	0	0	0	44
48	4	0	1	2	0	0	55
41	5	2	0	0	0	0	48
156	28	6	2	2	0	0	194
35	5	4	3	0	0	0	47
74	11	0	0	0	0	0	85
76	7	6	1	1	0	0	91
76	12	3	1	0	0	0	92
261	35	13	5	1	0	0	315
47	17	0	0	1	0	0	65
66	5	0	0	0	0	0	71
77	19	1	3	1	0	0	101
73	4	2	2	0	0	0	81
263	45	3	5	2	0	0	318
101	16	0	0	2	0	1	120
93	12	0	0	0	0	0	105
86	6	1	0	0	0	0	93
83	5	1	0	0	1	0	90
363	39	2	0	2	1	1	408
67	3	0	1	0	0	0	71
78	5	0	0	1	2	0	86
64	2	0	0	0	0	0	66
54	3	2	0	0	0	0	59
263	13	2	1	1	2	0	282
2565	344	74	40	26	10	5	3064

TIME	TO ARM D B4429 (W)							
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
07:00	65	5	2	1	0	1	0	74
07:15	77	9	2	0	1	2	0	91
07:30	74	5	0	0	0	1	0	80
07:45	65	7	0	0	0	0	0	72
H/TOT	281	26	4	1	1	4	0	317
08:00	77	7	0	1	1	0	0	86
08:15	70	5	2	1	0	0	0	78
08:30	58	7	1	0	1	0	0	67
08:45	47	3	3	2	5	1	0	61
H/TOT	252	22	6	4	7	1	0	292
09:00	47	4	1	0	0	0	0	52
09:15	48	11	4	2	0	0	0	65
09:30	36	5	2	0	0	1	0	44
09:45	38	6	2	0	1	0	0	47
H/TOT	169	26	9	2	1	1	0	208
10:00	31	7	1	0	0	0	0	39
10:15	26	4	1	0	0	0	0	31
10:30	35	4	3	2	0	0	0	44
10:45	32	4	2	0	0	0	0	38
H/TOT	124	19	7	2	0	0	0	152
11:00	28	5	3	2	0	0	0	38
11:15	40	6	0	1	0	1	0	48
11:30	28	6	2	0	0	0	0	36
11:45	33	8	2	0	1	1	0	45
H/TOT	129	25	7	3	1	2	0	167
12:00	27	9	0	1	0	0	0	37
12:15	34	12	0	1	0	0	0	47
12:30	27	5	4	0	0	0	0	36
12:45	25	6	1	2	0	0	0	34
H/TOT	113	32	5	4	0	0	0	154
13:00	45	7	0	2	0	2	0	56
13:15	39	5	1	0	0	0	0	45
13:30	33	9	0	1	0	0	0	43
13:45	26	8	3	1	1	0	0	39
H/TOT	143	29	4	4	1	2	0	183
14:00	33	8	3	0	0	0	0	44
14:15	27	3	2	3	0	0	0	35
14:30	32	5	0	1	0	0	0	38
14:45	27	3	1	1	0	0	0	32
H/TOT	119	19	6	5	0	0	0	149
15:00	39	5	2	3	0	1	0	50
15:15	37	6	0	0	0	0	0	43
15:30	46	7	0	0	1	0	1	55
15:45	57	2	1	0	0	0	0	60
H/TOT	179	20	3	3	1	1	1	208
16:00	58	9	1	2	2	0	0	72
16:15	58	9	0	0	1	0	0	68
16:30	57	11	1	2	1	0	0	72
16:45	68	9	1	1	0	0	0	79
H/TOT	241	38	3	5	4	0	0	291
17:00	73	7	0	1	0	1	0	82
17:15	67	4	0	0	0	0	0	71
17:30	61	7	0	0	0	0	0	68
17:45	60	3	0	0	1	0	0	64
H/TOT	261	21	0	1	1	1	0	285
18:00	44	1	0	3	0	0	0	48
18:15	50	0	2	0	1	0	0	53
18:30	42	0	1	0	1	0	0	44
18:45	61	3	0	0	0	1	0	65
H/TOT	197	4	3	3	2	1	0	210
P/TOT	2208	281	57	37	19	13	1	26

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 05/06/2024

DAY: WEDNESDAY

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 05/06/2024

DAY: WEDNESDAY

TIME	A TO B								TIME	A TO C								TIME	A TO D								B TO A									
	FROM A426 (N) TO B4429 (E)									FROM A426 (N) TO A426 (S)									FROM A426 (N) TO B4429 (W)								FROM B4429 (E) TO A426 (N)									
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT		CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT		CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT		CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT	
07:00	40	2	0	0	0	0	0	1	43	73	9	1	4	1	0	0	0	88	07:00	57	8	0	0	0	0	0	0	65	17	4	0	1	0	0	0	22
07:15	52	8	0	0	0	0	0	1	61	75	13	3	0	1	0	0	92	07:15	65	8	2	0	1	0	0	0	76	25	3	1	0	1	0	0	30	
07:30	48	5	0	0	0	0	0	0	53	70	8	3	0	1	1	0	83	07:30	59	7	1	1	0	0	0	0	68	36	4	2	0	0	1	0	43	
07:45	50	5	3	0	0	0	0	0	58	79	11	2	1	0	0	0	93	07:45	41	3	1	0	0	0	0	0	45	34	4	1	0	0	0	0	39	
H/TOT	190	20	3	0	0	0	0	2	215	297	41	9	5	3	1	0	356	H/TOT	222	26	4	1	1	1	0	0	254	112	15	4	1	1	1	0	134	
08:00	39	5	2	0	0	0	0	0	46	57	7	2	1	0	1	0	68	08:00	60	4	0	0	1	0	0	0	65	45	2	0	0	2	0	0	49	
08:15	34	5	1	0	0	0	0	0	40	52	8	1	0	0	0	0	61	08:15	56	4	3	1	0	0	0	0	64	40	0	1	0	0	1	1	0	43
08:30	27	2	3	0	1	0	0	0	33	75	6	2	0	0	0	0	83	08:30	52	4	0	1	3	1	0	0	61	36	3	0	2	0	1	0	42	
08:45	37	1	0	0	0	0	0	2	40	54	5	0	2	1	0	0	62	08:45	40	1	1	0	2	0	0	0	44	27	1	0	0	0	0	0	28	
H/TOT	137	13	6	0	1	0	2	159	238	26	5	3	1	1	0	0	274	H/TOT	208	13	4	2	6	1	0	0	234	148	6	1	2	3	2	0	162	
09:00	36	2	3	1	0	0	0	1	43	41	4	1	0	2	0	0	48	09:00	51	4	2	0	0	0	0	0	57	26	1	0	0	0	0	1	0	28
09:15	19	0	0	0	1	0	0	0	20	28	5	2	0	0	0	0	35	09:15	30	4	1	0	0	0	0	0	35	27	5	3	0	0	0	0	0	35
09:30	12	3	0	0	0	1	0	0	16	37	6	3	1	0	0	0	47	09:30	27	4	1	0	0	0	0	0	32	18	2	2	1	0	0	0	0	23
09:45	15	2	1	0	0	1	0	0	19	36	5	2	1	1	0	0	45	09:45	35	3	1	1	0	0	0	0	40	21	3	2	0	0	0	0	0	26
H/TOT	82	7	4	1	1	2	1	98	142	20	8	2	3	0	0	0	175	H/TOT	143	15	5	1	1	0	0	0	164	92	11	7	1	0	0	1	0	112
10:00	15	3	1	0	0	0	0	1	20	39	7	1	0	0	0	0	47	10:00	37	3	1	1	0	0	0	0	42	22	6	2	1	0	0	0	0	31
10:15	26	6	0	2	0	0	0	0	34	39	11	1	2	0	0	0	53	10:15	34	3	1	0	0	0	0	0	38	13	2	1	0	0	0	0	0	16
10:30	19	3	3	0	0	0	0	2	27	44	2	0	0	0	0	0	46	10:30	31	3	6	1	0	0	0	0	41	19	5	0	0	0	0	0	0	24
10:45	16	4	1	0	0	0	0	0	21	27	2	4	0	0	0	0	33	10:45	26	4	2	0	0	0	0	0	32	26	4	0	1	0	2	0	0	33
H/TOT	76	16	5	2	0	0	3	102	149	22	6	2	0	0	0	0	179	H/TOT	128	13	10	2	0	0	0	0	153	89	17	3	2	0	2	0	0	104
11:00	21	4	1	0	0	0	0	0	26	40	8	1	1	1	0	1	52	11:00	33	4	0	1	0	0	0	0	38	35	3	0	0	0	0	0	0	38
11:15	34	4	1	0	0	0	0	0	39	31	7	3	0	0	3	0	44	11:15	39	2	0	2	0	1	0	0	44	22	3	2	0	0	0	0	0	27
11:30	28	4	2	0	1	0	0	0	35	31	3	3	0	0	1	0	38	11:30	23	7	5	1	1	1	0	0	37	30	1	2	0	0	0	0	2	35
11:45	28	3	0	0	0	0	0	0	31	21	1	0	0	0	0	0	22	11:45	33	3	3	1	0	0	0	0	40	27	4	1	0	0	0	0	1	33
H/TOT	111	15	4	0	1	0	0	0	131	123	19	7	1	1	4	1	156	H/TOT	128	16	8	5	1	1	1	0	159	114	11	5	0	0	0	0	3	133
12:00	24	3	0	0	0	0	0	0	27	24	1	1	0	1	0	0	27	12:00	38	5	3	1	0	0	0	0	47	23	5	1	0	0	0	0	0	29
12:15	29	2	2	1	0	0	0	0	34	28	2	1	0	0	2	0	33	12:15	34	9	1	0	0	0	0	0	44	30	4	0	0	0	0	0	1	35
12:30	25	2	0	0	0	0	0	0	27	25	1	1	0	0	1	0	28	12:30	32	6	1	0	1	0	0	0	40	23	1	0	1	0	0	0	0	25
12:45	33	1	2	0	0	0	0	1	37	26	6	0	1	0	1	1	35	12:45	22	6	0	0	0	0	0	0	28	30	1	1	1	1	0	1	0	35
H/TOT	111	8	4	1	0	0	1	125	103	10	3	1	1	4	1	1	123	H/TOT	126	26	5	1	1	0	0	0	159	106	11	2	2	1	0	0	2	124
13:00	27	0	1	0	0	1	0	0	29	30	7	0	1	1	1	0	40	13:00	31	8	1	0	0	0	0	0	40	18	1	2	0	0	0	0	1	22
13:15	18	1	1	1	0	0	0	0	21	28	6	1	0	0	0	0	35	13:15	25	3	3	2	0	0	0	0	33	35	5	1	0	0	0	0	1	42
13:30	23	3	2	2	0	1	0	0	31	23	4	2	0	0	0	0	29	13:30	39	6	0	1	0	1	0	0	47	21	1	1	0	0	0	0	0	23
13:45	31	3	0	1	0	0	0	0	35	23	5	2	1	0	0	0	31	13:45	31	6	3	0	1	0	0	0	41	29	3	1	1	0	0	0	0	34
H/TOT	99	7	4	4	0	2	0	0	116	104	22	5	2	1	1	0	135	H/TOT	126	23	7	3	1	1	1	0	161	103	10	5	1	0	0	0	2	121
14:00	29	4	0	0	0	0	0	0	33	36	6	0	0	1	1	0	44	14:00	31	8	2	1	0	0	0	0	42	33	1	0	2	0	0	0	1	37
14:15	31	0	0	1	0	0	0	0	32	28	1	3	1	0	1	0	34	14:15	33	2	3	1	0	0	1	0	40	33	4	1	0	0	1	0	0	39
14:30	30	3	2	0	0	0	0	0	35	42	3	2	0	0	1	0	48	14:30	25	4	1	1	0	0	0	0	31	39	4	2	0	0	0	0	0	45
14:45	35	2	0	0	0	1	0	0	38	32	5	1	0	0	0	1	39	14:45	32	4	2	3	0	0	0	0	41	37	3	1	0	0	0	1	0	42
H/TOT	125	9	2	1	0	1	0	0	138	138	15	6	1	1	3	1	165	H/TOT	121	18	8	6	0	0	1	0	154	142	12	4	2	1	1	1	1	163
15:00	28	4	1	0	0	0	0	0	33	48	3	0	0	1	1	0	53	15:00	45	6	2	0	0	0	1	0	54	44	9	0	0	0	0	1	0	54
15:15	30	6	1	1	1	0	0	0	39	41	3	2	0	1	0	0	47	15:15	42	4	2	0	0	0	0	0	48	48	4	1	0	0	0	1	0	54
15:30	28	1	0	1	0	0	0	0	30	40	1	3	2	0	0	0	46	15:30	42	7	0	0	0	0	0	0	49	29	2	2	0	0	0	1	0	34
15:45	33	2	0	0	0	0	0	0	35	37	5	0	0	1	2	1	46	15:45	50	4	1	1	1	0	0	0	57	22	3	1	0	0	0	0	0	26
H/TOT	119	13	2	2	1	0	0	0	137	166	12	5	2	3	3	1	192	H/TOT	179	21	5	1	1</													

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 05/06/2024

DAY: WEDNESDAY

TIME	B TO C							
	FROM B4429 (E) TO A426 (S)							
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
07:00	0	1	1	0	0	0	0	2
07:15	3	0	0	0	0	0	0	3
07:30	1	1	1	1	0	0	0	4
07:45	4	1	0	0	0	0	0	5
H/TOT	8	3	2	1	0	0	0	14
08:00	10	0	0	0	0	0	0	10
08:15	9	2	0	1	0	0	0	12
08:30	6	2	1	0	0	0	0	9
08:45	7	0	0	0	0	0	0	7
H/TOT	32	4	1	1	0	0	0	38
09:00	0	0	0	1	0	0	0	1
09:15	5	0	0	0	0	0	0	5
09:30	1	1	1	1	0	0	0	4
09:45	1	1	1	0	0	0	0	3
H/TOT	7	2	2	2	0	0	0	13
10:00	3	0	0	1	0	0	0	4
10:15	6	1	0	0	0	0	0	7
10:30	3	0	0	1	0	0	0	4
10:45	8	0	0	0	0	0	0	8
H/TOT	20	1	0	2	0	0	0	23
11:00	3	1	0	0	0	0	0	4
11:15	6	0	0	0	0	0	0	6
11:30	2	2	0	0	0	0	0	4
11:45	4	0	1	0	0	0	0	5
H/TOT	15	3	1	0	0	0	0	19
12:00	5	1	1	0	0	0	0	7
12:15	4	0	0	0	0	0	0	4
12:30	3	0	0	0	0	0	0	3
12:45	4	1	0	0	0	0	0	5
H/TOT	16	2	1	0	0	0	0	19
13:00	5	0	0	0	0	0	0	5
13:15	6	0	0	1	0	0	0	7
13:30	2	0	1	0	0	1	0	4
13:45	5	2	0	0	0	0	0	7
H/TOT	18	2	1	1	0	1	0	23
14:00	5	0	0	0	0	0	1	6
14:15	3	0	0	1	0	0	0	4
14:30	3	0	1	0	0	0	0	4
14:45	3	0	0	0	0	0	0	3
H/TOT	14	0	1	1	0	0	1	17
15:00	7	2	0	0	0	0	0	9
15:15	6	1	2	2	0	0	0	11
15:30	4	0	0	0	0	0	0	4
15:45	2	2	0	0	0	0	0	4
H/TOT	19	5	2	2	0	0	0	28
16:00	7	0	1	0	0	0	0	8
16:15	6	1	0	0	0	0	0	7
16:30	3	0	0	1	0	0	0	4
16:45	4	1	0	1	0	0	0	6
H/TOT	20	2	1	2	0	0	0	25
17:00	4	0	0	0	0	1	0	5
17:15	5	0	0	0	0	0	0	5
17:30	5	0	0	0	0	0	0	5
17:45	4	0	0	0	0	0	0	4
H/TOT	18	0	0	0	0	1	0	19
18:00	3	1	0	0	0	0	0	4
18:15	4	0	0	0	0	0	0	4
18:30	2	0	3	0	0	0	0	5
18:45	3	0	0	0	0	0	0	3
H/TOT	12	1	3	0	0	0	0	16
P/TOT	199	25	15	12	0	2	1	254

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 05/06/2024

DAY: WEDNESDAY

TIME	B TO D							
	FROM B4429 (E) TO B4429 (W)							
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
07:00	3	0	0	0	0	0	0	3
07:15	5	1	0	0	0	0	0	6
07:30	5	0	0	0	0	0	0	5
07:45	6	0	0	0	0	0	0	6
H/TOT	19	1	0	0	0	0	0	20
08:00	11	2	0	0	0	0	0	13
08:15	11	0	0	0	0	0	0	11
08:30	12	2	0	0	0	0	0	14
08:45	5	0	0	0	0	0	0	5
H/TOT	39	4	0	0	0	0	0	43
09:00	8	1	0	1	0	0	0	10
09:15	5	2	0	1	0	0	0	8
09:30	4	0	0	0	0	0	0	4
09:45	4	0	1	0	0	0	0	5
H/TOT	21	3	1	2	0	0	0	27
10:00	7	0	0	0	0	0	0	7
10:15	5	1	0	0	1	0	0	7
10:30	2	1	1	0	0	0	0	4
10:45	4	1	0	0	0	0	0	5
H/TOT	18	3	1	0	1	0	0	23
11:00	4	0	0	1	0	0	0	5
11:15	4	0	0	0	0	0	0	4
11:30	5	3	0	0	0	0	0	8
11:45	4	0	0	0	0	0	0	4
H/TOT	17	3	0	1	0	0	0	21
12:00	4	0	1	0	0	0	0	5
12:15	2	0	0	0	0	1	0	3
12:30	2	1	0	0	0	0	0	3
12:45	7	0	0	0	0	0	0	7
H/TOT	15	1	1	0	0	1	0	18
13:00	6	0	0	0	0	0	0	6
13:15	5	0	0	0	0	0	0	5
13:30	1	0	0	0	0	0	0	1
13:45	2	0	0	0	0	0	0	2
H/TOT	14	0	0	0	0	0	0	14
14:00	4	1	0	0	0	0	0	5
14:15	1	0	0	0	0	1	0	2
14:30	7	0	0	0	0	0	0	7
14:45	2	1	0	0	0	0	0	3
H/TOT	14	2	0	0	0	1	0	17
15:00	7	0	0	0	0	0	0	7
15:15	6	0	0	0	0	0	0	6
15:30	4	2	1	0	0	0	0	7
15:45	8	2	0	0	0	0	0	10
H/TOT	25	4	1	0	0	0	0	30
16:00	8	0	0	0	0	0	0	8
16:15	7	0	0	0	1	0	0	8
16:30	14	1	0	0	0	0	0	15
16:45	14	2	0	1	0	0	0	17
H/TOT	43	3	0	1	1	0	0	48
17:00	12	0	1	0	0	0	0	13
17:15	23	1	0	0	0	0	0	24
17:30	4	2	1	0	0	0	0	7
17:45	5	0	0	0	0	0	0	5
H/TOT	44	3	2	0	0	0	0	49
18:00	4	1	1	3	0	0	0	9
18:15	7	3	0	1	0	0	0	11
18:30	7	0	0	1	0	0	0	8
18:45	7	0	0	3	0	2	1	13
H/TOT	25	4	1	8	0	2	1	41
P/TOT	294	31	7	12	2	4	1	351

	C TO A							TOT
	FROM A426 (S) TO A426 (N)							
CAR	LGV	OGV1	OGV2	PSV	MCL	PCL		
24	2	0	2	0	0	0	28	
31	5	1	1	1	0	0	39	
46	4	2	0	3	1	0	56	
57	5	2	3	1	0	1	69	
158	16	5	6	5	1	1	192	
66	1	1	1	0	1	0	70	
55	6	1	0	0	1	0	63	
50	6	0	0	1	1	0	58	
67	6	2	0	1	0	0	76	
238	19	4	1	2	3	0	267	
40	10	2	1	0	0	1	54	
29	1	4	0	1	0	1	36	
46	5	4	1	0	0	0	56	
40	2	2	0	0	0	0	44	
155	18	12	2	1	0	2	190	
23	3	1	0	0	0	1	28	
18	12	2	2	1	1	0	36	
22	2	1	1	0	2	2	30	
21	3	5	0	0	0	1	30	
84	20	9	3	1	3	4	124	
27	6	2	0	0	0	0	35	
40	6	2	0	1	0	0	49	
22	4	0	0	0	0	0	26	
36	4	0	3	0	0	0	43	
125	20	4	3	1	0	0	153	
31	9	0	1	1	0	0	42	
27	10	1	4	0	0	0	42	
43	9	1	0	1	0	1	55	
39	3	1	0	0	1	0	44	
140	31	3	5	2	1	1	183	
38	5	2	0	0	0	0	45	
25	8	0	0	0	1	0	34	
38	6	1	0	1	0	0	46	
38	3	1	0	0	0	0	42	
139	22	4	0	1	1	0	167	
27	4	0	0	0	0	0	31	
38	5	1	0	1	1	0	46	
37	8	2	0	1	0	0	48	
42	7	2	0	0	0	0	51	
144	24	5	0	2	1	0	176	
44	2	3	1	0	0	0	50	
54	3	1	0	1	1	0	60	
78	2	1	0	0	0	0	81	
58	3	1	1	0	0	1	64	
234	10	6	2	1	1	1	255	
52	9	2	0	1	0	0	64	
65	7	1	0	0	0	0	73	
76	2	0	1	1	0	0	80	
67	5	0	0	0	1	0	73	
260	23	3	1	2	1	0	290	
50	4	0	1	1	0	1	57	
75	6	0	0	2	0	0	83	
61	2	0	1	0	0	0	64	
66	11	0	1	0	0	0	78	
252	23	0	3	3	0	1	282	
48	4	1	0	0	1	0	54	
57	6	0	0	0	0	1	64	
51	4	1	0	0	0	0	56	
65	1	1	0	1	1	1	70	
221	15	3	0	1	2	2	244	
2150	241	58	26	22	14	12	2523	

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 05/06/2024

DAY: WEDNESDAY

TIME	C TO D							
	FROM A426 (S) TO B4429 (W)							
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
07:00	1	2	0	0	0	0	0	3
07:15	4	0	0	1	0	0	0	5
07:30	6	1	0	0	0	0	0	7
07:45	11	0	2	1	0	0	0	14
H/TOT	22	3	2	2	0	0	0	29
08:00	4	0	1	0	0	0	0	5
08:15	6	0	0	0	0	0	0	6
08:30	5	1	1	0	0	0	0	7
08:45	7	1	0	0	0	0	0	8
H/TOT	22	2	2	0	0	0	0	26
09:00	8	1	1	2	0	0	0	12
09:15	2	1	0	0	1	0	0	4
09:30	10	1	0	1	0	0	0	12
09:45	4	2	0	0	0	0	0	6
H/TOT	24	5	1	3	1	0	0	34
10:00	7	0	1	0	0	0	0	8
10:15	6	0	1	1	0	0	0	8
10:30	6	1	1	0	0	0	0	8
10:45	5	0	0	1	0	0	0	6
H/TOT	24	1	3	2	0	0	0	30
11:00	1	1	1	0	0	0	0	3
11:15	4	0	0	0	0	0	0	4
11:30	6	2	0	0	0	0	0	8
11:45	4	1	1	0	0	0	0	6
H/TOT	15	4	2	0	0	0	0	21
12:00	10	1	1	0	0	0	0	12
12:15	14	2	1	0	0	0	0	17
12:30	6	1	0	0	0	0	0	7
12:45	12	0	0	2	0	0	0	14
H/TOT	42	4	2	2	0	0	0	50
13:00	3	2	0	0	0	0	0	5
13:15	4	0	0	0	0	0	0	4
13:30	3	1	1	0	0	0	0	5
13:45	12	0	0	0	0	0	0	12
H/TOT	22	3	1	0	0	0	0	26
14:00	8	0	0	0	0	0	0	8
14:15	5	0	0	0	0	0	0	5
14:30	6	3	4	1	0	0	0	14
14:45	8	1	1	0	0	0	0	10
H/TOT	27	4	5	1	0	0	0	37
15:00	8	3	0	1	0	0	0	12
15:15	4	0	0	0	0	0	0	4
15:30	9	2	0	0	0	0	0	11
15:45	7	1	0	2	0	0	0	10
H/TOT	28	6	0	3	0	0	0	37
16:00	5	0	0	0	0	0	0	5
16:15	5	0	0	1	0	0	0	6
16:30	18	1	0	0	0	0	0	19
16:45	10	1	0	0	0	0	0	11
H/TOT	38	2	0	1	0	0	0	41
17:00	6	1	0	0	0	0	0	7
17:15	6	0	0	0	0	0	0	6
17:30	6	0	0	1	0	1	0	8
17:45	2	2	1	1	0	0	0	6
H/TOT	20	3	1	2	0	1	0	27
18:00	6	0	0	0	0	0	0	6
18:15	5	0	1	0	0	0	0	6
18:30	5	0	0	0	0	0	0	5
18:45	9	0	1	0	0	0	0	10
H/TOT	25	0	2	0	0	0	0	27
P/TOT	309	37	21	16	1	1	0	385

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 05/06/2024

DAY: WEDNESDAY

TIME	D TO A							
	FROM B4429 (W) TO A426 (N)							
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT
07:00	31	8	0	0	0	0	0	39
07:15	40	3	3	0	0	1	0	47
07:30	51	7	4	2	0	0	0	64
07:45	57	9	1	1	0	0	0	68
H/TOT	179	27	8	3	0	1	0	218
08:00	56	5	0	1	3	0	0	65
08:15	63	9	4	1	2	0	0	79
08:30	39	9	1	0	0	0	0	49
08:45	54	8	0	0	1	0	0	63
H/TOT	212	31	5	2	6	0	0	256
09:00	41	2	5	3	0	0	1	52
09:15	22	7	4	0	0	1	0	34
09:30	29	7	4	0	0	0	0	40
09:45	24	2	2	0	0	0	0	28
H/TOT	116	18	15	3	0	1	1	154
10:00	22	2	3	0	0	0	0	27
10:15	19	4	1	0	1	0	0	25
10:30	19	6	0	1	0	0	0	26
10:45	28	5	0	0	0	0	0	33
H/TOT	88	17	4	1	1	0	0	111
11:00	25	2	1	0	1	0	0	29
11:15	32	4	0	1	0	0	0	37
11:30	32	4	1	1	0	0	0	38
11:45	44	6	1	0	0	0	0	51
H/TOT	133	18	3	2	1	0	0	155
12:00	28	7	1	0	0	0	0	36
12:15	35	2	2	1	0	0	0	40
12:30	38	1	2	0	0	0	0	41
12:45	36	5	3	0	0	0	0	43
H/TOT	136	15	8	1	0	0	0	160
13:00	41	7	2	1	0	0	0	51
13:15	44	1	4	1	1	0	0	51
13:30	57	3	1	0	1	0	0	62
13:45	28	5	0	0	0	1	0	34
H/TOT	170	16	7	2	2	1	0	198
14:00	52	5	1	1	0	0	0	59
14:15	43	1	0	0	0	0	0	44
14:30	53	5	2	1	1	0	0	62
14:45	43	5	1	0	1	0	0	50
H/TOT	191	16	4	2	2	0	0	215
15:00	42	1	1	1	0	0	0	45
15:15	65	6	1	2	1	0	0	75
15:30	55	7	0	0	0	0	0	62
15:45	50	9	0	0	1	0	0	60
H/TOT	212	23	2	3	2	0	0	242
16:00	64	7	0	1	0	0	0	72
16:15	62	9	1	1	1	0	0	74
16:30	75	7	0	0	0	0	0	82
16:45	92	1	0	0	1	0	0	94
H/TOT	293	24	1	2	2	0	0	322
17:00	85	5	0	0	0	0	0	90
17:15	94	10	1	0	0	1	0	106
17:30	101	7	0	0	0	1	0	109
17:45	84	2	0	0	0	0	0	86
H/TOT	364	24	1	0	0	2	0	391
18:00	83	7	0	0	1	0	0	91
18:15	73	3	0	0	0	1	0	77
18:30	53	3	0	0	0	1	0	57
18:45	57	3	0	0	0	0	0	60
H/TOT	266	16	0	0	1	2	0	285
P/TOT	2360	243	58	21	17	7	1	2707

D TO B								
FROM B4429 (W) TO B4429 (E)								
CAR	LOV	OGV1	OGV2	PSV	MCL	PCL	TOT	
5	0	0	0	0	0	0	5	
1	2	0	0	0	0	0	3	
5	0	0	0	0	0	0	5	
4	2	0	0	0	1	0	7	
15	4	0	0	0	1	0	20	
7	2	0	0	0	0	0	9	
12	2	0	0	0	0	0	14	
4	0	1	0	0	0	0	5	
6	1	0	0	0	0	0	7	
29	5	1	0	0	0	0	35	
10	2	2	1	0	0	2	17	
3	1	0	0	0	0	0	4	
6	0	2	0	0	0	0	8	
3	1	0	0	0	0	0	4	
22	4	4	1	0	0	2	33	
4	1	0	1	0	0	0	6	
4	0	0	0	0	0	0	4	
4	0	0	0	0	0	0	4	
6	1	0	0	0	0	1	8	
18	2	0	1	0	0	1	22	
7	0	0	0	0	0	0	7	
7	1	0	0	0	0	0	8	
3	1	0	0	0	0	0	4	
6	1	0	0	0	0	0	7	
23	3	0	0	0	0	0	26	
6	0	0	0	0	0	0	6	
3	0	0	0	0	0	0	3	
5	1	0	0	2	0	0	8	
10	0	0	0	0	0	0	10	
24	1	0	0	2	0	0	27	
5	0	0	0	0	0	0	5	
5	2	0	0	0	0	0	7	
5	1	0	0	0	0	0	6	
8	0	0	0	0	0	1	9	
23	3	0	0	0	0	1	27	
2	1	0	0	0	0	0	3	
3	0	0	0	0	0	0	3	
7	3	0	0	0	0	0	10	
4	0	0	0	0	0	0	4	
16	4	0	0	0	0	0	20	
5	1	0	0	0	3	0	9	
6	0	0	0	0	0	0	6	
8	1	0	0	0	0	0	9	
12	3	0	0	0	0	0	15	
31	5	0	0	0	3	0	39	
8	3	0	0	0	0	0	11	
10	3	0	0	0	0	0	13	
8	0	0	0	0	1	0	9	
7	1	0	0	0	0	0	8	
33	7	0	0	0	1	0	41	
10	0	0	0	0	0	0	10	
7	0	0	0	0	0	0	7	
7	1	0	0	0	0	0	8	
7	0	1	0	0	0	0	8	
31	1	1	0	0	0	0	33	
4	1	0	0	0	0	0	5	
2	1	0	2	1	0	0	6	
6	0	0	2	0	0	0	8	
5	0	1	0	0	0	0	6	
17	2	1	4	1	0	0	25	
282	41	7	6	3	5	4	348	

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 05/06/2024

DAY: WEDNESDAY

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 05/06/2024

DAY: WEDNESDAY

TIME	TO ARM A A426 (N)							TOT
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	
07:00	72	14	0	3	0	0	0	89
07:15	96	11	5	1	2	1	0	116
07:30	133	15	8	2	3	2	0	163
07:45	148	18	4	4	1	0	1	176
H/TOT	449	58	17	10	6	3	1	544
08:00	167	8	1	2	5	1	0	184
08:15	158	15	6	1	3	2	0	185
08:30	125	18	1	2	1	2	0	149
08:45	148	15	2	0	2	0	0	167
H/TOT	598	56	10	5	11	5	0	685
09:00	107	13	7	4	0	1	2	134
09:15	78	13	11	0	1	1	1	105
09:30	93	14	10	2	0	0	0	119
09:45	85	7	6	0	0	0	0	98
H/TOT	363	47	34	6	1	2	3	456
10:00	67	11	6	1	0	0	1	86
10:15	50	18	4	2	2	1	0	77
10:30	60	13	1	2	0	2	2	80
10:45	75	12	5	1	0	2	1	96
H/TOT	252	54	16	6	2	5	4	339
11:00	87	11	3	0	1	0	0	102
11:15	94	13	4	1	1	0	0	113
11:30	84	9	3	1	0	0	2	99
11:45	107	14	2	3	0	0	1	127
H/TOT	372	47	12	5	2	0	3	441
12:00	82	21	2	1	1	0	0	107
12:15	92	16	3	5	0	0	1	117
12:30	104	11	3	1	1	0	1	121
12:45	104	9	5	1	1	1	1	122
H/TOT	362	57	13	8	3	1	3	467
13:00	97	13	6	1	0	0	1	118
13:15	104	14	5	1	1	1	1	127
13:30	116	10	3	0	2	0	0	131
13:45	95	11	2	1	0	1	0	110
H/TOT	412	48	16	3	3	2	2	486
14:00	112	10	1	3	0	0	1	127
14:15	114	10	2	0	2	1	0	129
14:30	129	17	6	1	2	0	0	155
14:45	122	15	4	0	1	1	0	143
H/TOT	477	52	13	4	5	2	1	554
15:00	130	12	4	2	0	1	0	149
15:15	167	13	3	2	2	2	0	189
15:30	162	11	3	0	0	1	0	177
15:45	130	15	2	1	1	0	1	150
H/TOT	589	51	12	5	3	4	1	665
16:00	142	23	3	1	1	0	0	170
16:15	157	21	3	2	1	0	0	184
16:30	197	11	1	1	1	0	0	211
16:45	206	13	0	0	1	1	0	221
H/TOT	702	68	7	4	4	1	0	786
17:00	192	13	1	1	1	0	1	209
17:15	213	19	4	0	2	2	0	240
17:30	219	10	2	1	0	1	0	233
17:45	199	17	0	1	0	0	0	217
H/TOT	823	59	7	3	3	3	1	899
18:00	159	12	2	0	1	1	0	175
18:15	170	10	0	0	0	1	1	182
18:30	137	13	1	0	0	1	0	152
18:45	158	6	1	0	1	1	2	169
H/TOT	624	41	4	0	2	4	3	678
P/TOT	6043	638	161	59	45	32	22	7000

FROM ARM A A426 (N)								TOT
CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	TOT	
170	19	1	4	1	0	1	196	
182	29	5	0	2	0	1	229	
177	20	4	1	1	1	0	204	
170	19	6	1	0	0	0	196	
709	87	16	6	4	1	2	825	
156	16	4	1	1	1	0	179	
142	17	5	1	0	0	0	165	
154	12	5	1	4	1	0	177	
131	7	1	2	3	0	2	146	
583	52	15	5	8	2	2	667	
128	10	6	1	2	0	1	148	
77	9	3	0	1	0	0	90	
76	13	4	1	0	1	0	95	
86	10	4	2	1	1	0	104	
367	42	17	4	4	2	1	437	
91	13	3	1	0	0	1	109	
99	20	2	4	0	0	0	125	
94	8	9	1	0	0	2	114	
69	10	7	0	0	0	0	86	
353	51	21	6	0	0	3	434	
94	16	2	2	1	0	1	116	
104	13	4	2	0	4	0	127	
82	14	10	1	2	1	0	110	
82	7	3	1	0	0	0	93	
362	50	19	6	3	5	1	446	
86	9	4	1	1	0	0	101	
91	13	4	1	0	2	0	111	
82	9	2	1	0	1	1	95	
81	13	2	1	0	1	2	100	
340	44	12	3	2	4	2	407	
88	15	2	1	1	2	0	109	
71	10	5	3	0	0	0	89	
85	13	4	3	0	2	0	107	
85	14	5	2	1	0	0	107	
329	52	16	9	2	4	0	412	
96	18	2	1	1	1	0	119	
92	3	6	3	0	2	0	106	
97	10	5	1	0	1	0	114	
99	11	3	3	0	1	1	118	
384	42	16	8	1	5	1	457	
121	13	3	0	1	2	0	140	
113	13	5	1	2	0	0	134	
110	9	3	3	0	0	0	125	
120	11	1	1	2	2	1	138	
464	46	12	5	5	4	1	537	
134	14	2	1	4	1	0	156	
111	18	4	2	0	2	0	137	
132	17	3	1	1	0	0	154	
118	12	1	2	1	0	1	135	
485	61	10	6	6	3	1	582	
125	12	2	2	0	2	0	143	
125	4	0	0	2	1	1	133	
136	5	1	1	0	0	3	146	
115	6	0	1	1	0	0	123	
501	27	3	4	3	3	4	545	
115	5	2	0	2	0	0	124	
111	7	4	1	0	1	2	126	
107	9	0	0	2	1	3	122	
101	3	0	0	1	2	6	113	
434	24	6	1	5	4	11	485	
5321	578	163	63	43	37	29	6234	

TIME	TO ARM B B4429 (E)							TOT
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL	
07:00	47	2	0	0	0	1	1	51
07:15	56	10	0	0	0	0	1	67
07:30	57	5	1	0	0	0	0	63
07:45	55	7	4	0	0	1	0	67
H/TOT	215	24	5	0	0	2	2	248
08:00	49	8	2	0	0	0	0	59
08:15	51	8	2	0	0	0	0	61
08:30	33	2	4	0	1	0	0	40
08:45	48	2	1	0	0	0	2	53
H/TOT	181	20	9	0	1	0	2	213
09:00	52	5	5	2	0	0	3	67
09:15	23	1	1	0	1	0	0	26
09:30	23	3	3	0	0	1	0	30
09:45	20	3	1	0	0	1	0	25
H/TOT	118	12	10	2	1	2	3	148
10:00	21	6	1	1	0	0	1	30
10:15	35	6	0	2	0	0	1	44
10:30	29	3	3	0	0	0	2	37
10:45	25	5	1	0	0	0	1	32
H/TOT	110	20	5	3	0	0	5	143
11:00	30	5	1	0	0	0	0	36
11:15	43	6	1	0	0	0	0	50
11:30	34	5	2	0	1	0	0	42
11:45	44	4	1	0	0	0	0	49
H/TOT	151	20	5	0	1	0	0	177
12:00	33	5	0	0	0	0	0	38
12:15	33	4	2	1	0	0	1	41
12:30	33	4	0	0	2	0	0	39
12:45	47	2	2	0	0	0	1	52
H/TOT	146	15	4	1	2	0	2	170
13:00	42	0	1	0	0	1	0	44
13:15	26	4	1	1	0	0	0	32
13:30	33	4	2	2	0	1	0	42
13:45	40	5	0	1	0	0	1	47
H/TOT	141	13	4	4	0	2	1	165
14:00	31	6	0	0	0	0	0	37
14:15	35	1	0	1	0	0	0	37
14:30	40	8	2	0	0	0	0	50
14:45	41	4	0	0	0	1	0	46
H/TOT	147	19	2	1	0	1	0	170
15:00	36	7	1	0	0	3	0	47
15:15	38	6	1	1	1	0	0	47
15:30	41	6	0	1	0	0	0	48
15:45	48	8	1	0	1	0	0	58
H/TOT	163	27	3	2	2	3	0	200
16:00	55	6	0	1	2	0	0	64
16:15	43	11	0	1	0	0	0	55
16:30	53	2	2	0	0	1	0	58
16:45	50	4	1	0	0	0	0	55
H/TOT	201	23	3	2	2	1	0	232
17:00	47	2	1	1	0	1	0	52
17:15	45	1	1	0	0	0	1	48
17:30	51	5	0	1	0	0	2	59
17:45	43	1	1	1	0	0	0	46
H/TOT	186	9	3	3	0	1	3	205
18:00	34	4	1	0	1	0	0	40
18:15	33	2	4	2	1	2	0	44
18:30	53	2	0	2	0	1	0	58
18:45	37	2	2	0	0	2	0	43
H/TOT	157	10	7	4	2	5	0	185
P/TOT	1916	212	60	22	11	17	18	2256

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 05/06/2024

DAY: WEDNESDAY

MANUAL CLASSIFIED COUNTS

JOB REF: 13324

JOB NAME: RUGBY

SITE: 71

LOCATION: A426 (N) / B4429 (E) / A426 (S) / B4429 (W)

DATE: 05/06/2024

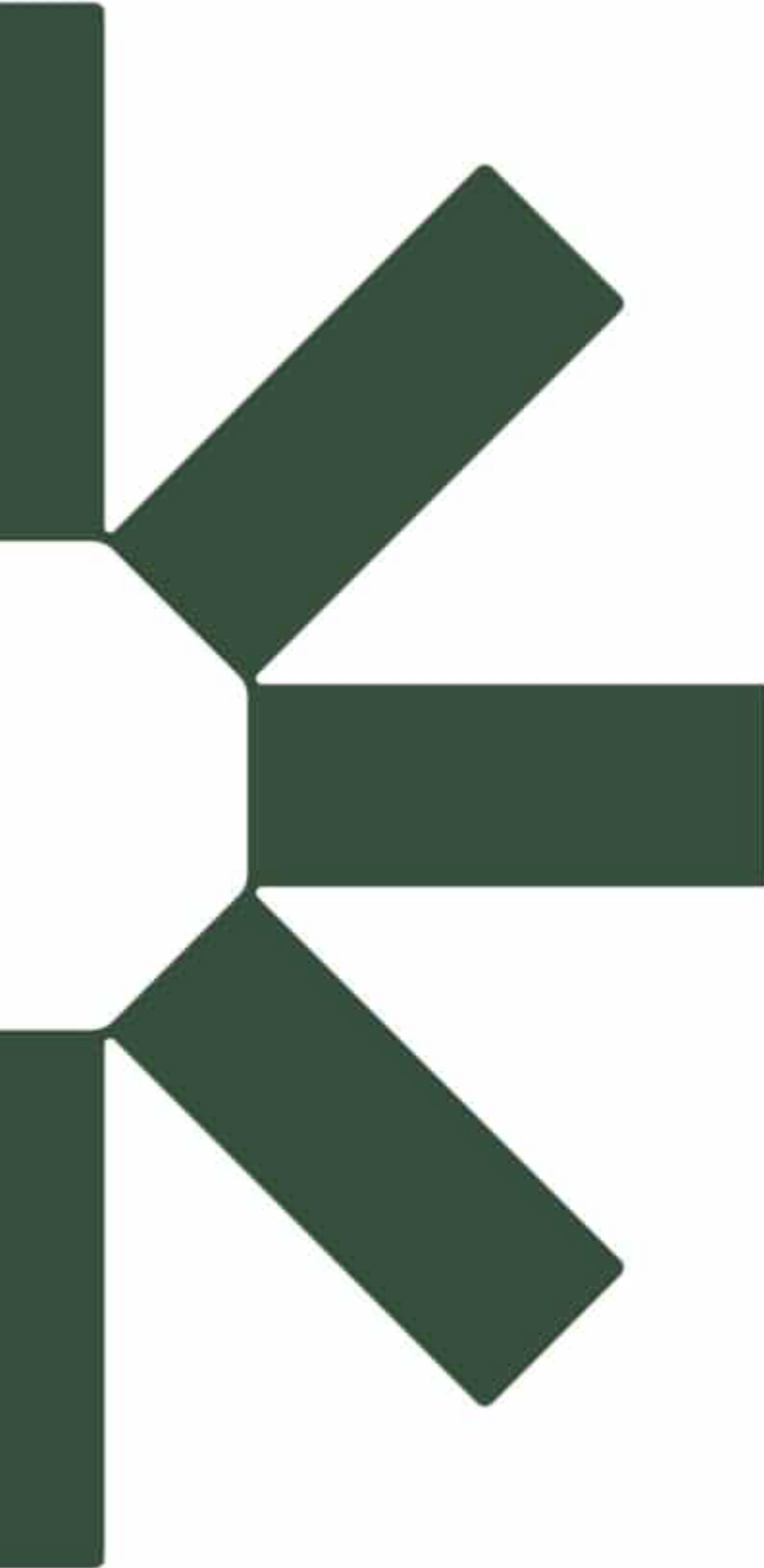
DAY: WEDNESDAY

TIME	TO ARM C						
	A426 (S)						
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL
07:00	80	11	3	4	1	0	0
07:15	87	13	3	0	1	0	0
07:30	85	10	4	2	1	1	0
07:45	102	15	2	1	0	0	0
H/TOT	354	49	12	7	3	1	0
08:00	85	7	2	2	0	1	0
08:15	81	12	2	1	0	0	0
08:30	115	12	4	1	0	0	0
08:45	80	6	2	2	1	0	0
H/TOT	361	37	10	6	1	1	0
09:00	49	5	1	2	2	0	0
09:15	38	8	2	0	0	0	0
09:30	46	9	4	3	0	0	0
09:45	50	7	4	1	1	0	0
H/TOT	193	29	11	6	3	0	0
10:00	47	10	3	2	0	0	0
10:15	52	13	1	2	0	0	0
10:30	52	6	0	1	0	0	0
10:45	44	4	5	0	0	0	0
H/TOT	195	33	9	5	0	0	0
11:00	35	11	2	1	1	0	1
11:15	47	8	4	0	0	3	0
11:30	39	6	3	0	0	1	0
11:45	37	3	1	0	0	0	0
H/TOT	178	28	10	1	1	4	1
12:00	35	4	2	0	1	0	0
12:15	40	4	1	1	0	2	0
12:30	37	1	1	0	0	1	0
12:45	35	8	0	1	0	1	1
H/TOT	147	17	4	2	1	4	1
13:00	39	8	0	1	1	1	0
13:15	42	6	2	3	0	0	0
13:30	32	5	5	0	0	1	0
13:45	32	9	2	1	0	0	0
H/TOT	145	28	9	5	1	2	0
14:00	48	7	0	0	1	1	1
14:15	52	3	3	3	0	1	0
14:30	56	5	3	1	0	1	0
14:45	47	8	4	2	0	0	1
H/TOT	203	23	10	6	1	3	2
15:00	74	7	0	1	2	1	0
15:15	61	4	4	2	1	1	0
15:30	46	1	3	2	0	0	0
15:45	55	8	0	0	1	2	1
H/TOT	236	20	7	5	4	4	1
16:00	81	6	2	1	1	0	0
16:15	55	7	3	1	1	1	0
16:30	60	7	2	2	0	0	0
16:45	56	5	0	2	1	0	1
H/TOT	252	25	7	6	3	1	1
17:00	61	3	2	1	0	1	0
17:15	61	1	0	0	2	1	0
17:30	68	3	0	0	0	0	1
17:45	57	3	0	1	1	0	0
H/TOT	247	10	2	2	3	2	1
18:00	76	2	1	0	0	0	0
18:15	51	5	0	1	0	2	1
18:30	45	6	3	0	1	0	0
18:45	47	1	0	0	0	1	0
H/TOT	219	14	4	1	1	3	1
P/TOT	2720	313	95	52	22	25	8

FROM ARM C						
A426 (S)						
CAR	LGV	OGV1	OGV2	PSV	MCL	PCL
27	4	0	2	0	1	0
38	5	1	2	1	0	0
56	5	3	0	3	1	0
69	5	5	4	1	0	1
190	19	9	8	5	2	1
73	2	2	1	0	1	0
66	7	2	0	0	1	0
57	7	1	0	1	1	0
79	7	3	0	1	0	0
275	23	8	1	2	3	0
54	12	3	3	0	0	1
32	2	5	0	2	0	1
61	6	5	2	0	0	0
46	4	2	0	0	0	0
193	24	15	5	2	0	2
32	5	2	0	0	0	1
29	12	3	3	1	1	1
34	3	2	1	0	2	2
29	3	5	1	0	0	1
124	23	12	5	1	3	5
30	8	3	0	0	0	0
46	7	2	0	1	0	0
31	6	0	0	0	0	0
50	5	2	3	0	0	0
157	26	7	3	1	0	0
44	12	1	1	1	0	0
42	14	2	4	0	0	1
52	11	1	0	1	0	1
56	4	1	2	0	1	0
193	41	5	7	2	1	2
51	7	2	0	0	0	0
32	9	0	0	0	1	0
46	7	2	0	1	0	0
51	5	1	0	0	0	0
180	28	5	0	1	1	0
35	5	0	0	0	0	0
44	6	1	0	1	1	0
46	13	6	1	1	0	0
52	10	3	0	0	0	0
177	34	10	1	2	1	0
55	7	3	2	0	0	0
60	3	1	0	1	1	0
92	8	1	0	0	0	0
68	7	2	3	1	0	1
275	25	7	5	2	1	1
60	10	2	1	1	0	0
77	7	1	1	0	0	0
98	4	1	1	1	0	0
84	7	0	0	0	1	0
319	28	4	3	2	1	0
60	5	1	1	1	0	1
89	7	1	0	2	0	0
72	3	0	2	0	1	0
70	13	1	3	0	0	0
291	28	3	6	3	1	1
58	4	1	0	0	1	0
65	6	1	0	0	2	1
60	4	1	0	0	0	0
75	1	3	0	1	1	1
258	15	6	0	1	4	2
2632	314	91	44	24	18	14

TIME	TO ARM D						
	B4429 (W)						
	CAR	LGV	OGV1	OGV2	PSV	MCL	PCL
07:00	61	10	0	0	0	0	0
07:15	74	9	2	1	1	0	0
07:30	70	8	1	1	0	0	0
07:45	58	3	3	1	0	0	0
H/TOT	263	30	6	3	1	0	0
08:00	75	6	1	0	1	0	0
08:15	73	4	3	1	0	0	0
08:30	69	7	1	1	3	1	0
08:45	52	2	1	0	2	0	0
H/TOT	269	19	6	2	6	1	0
09:00	67	6	3	3	0	0	0
09:15	37	7	1	1	1	0	0
09:30	41	5	1	1	0	0	0
09:45	43	5	2	1	0	0	0
H/TOT	198	23	7	6	1	0	0
10:00	51	3	2	1	0	0	0
10:15	45	4	2	1	1	0	0
10:30	39	5	8	1	0	0	0
10:45	35	5	2	1	0	0	0
H/TOT	170	17	14	4	1	0	0
11:00	38	5	1	2	0	0	0
11:15	47	2	0	2	0	1	0
11:30	34	12	5	1	1	0	0
11:45	41	4	4	1	0	0	0
H/TOT	160	23	10	6	1	1	0
12:00	52	6	5	1	0	0	0
12:15	50	11	2	0	0	1	0
12:30	40	8	1	0	1	0	0
12:45	41	6	0	2	0	0	0
H/TOT	183	31	8	3	1	1	0
13:00	40	10	1	0	0	0	0
13:15	34	3	3	2	0	0	0
13:30	43	7	1	1	0	1	0
13:45	45	6	3	0	1	0	0
H/TOT	162	26	8	3	1	1	0
14:00	43	9	2	1	0	0	0
14:15	39	2	3	1	0	2	0
14:30	38	7	5	2	0	0	0
14:45	42	6	3	3	0	0	0
H/TOT	162	24	13	7	0	2	0
15:00	60	9	2	1	0	1	0
15:15	52	4	2	0	0	0	0
15:30	55	11	1	0	0	0	0
15:45	65	7	1	3	1	0	0
H/TOT	232	31	6	4	1	1	0
16:00	52	6	1	1	1	1	0
16:15	59	4	1	1	1	1	0
16:30	78	12	0	1	1	0	0
16:45	70	9	0	2	0	0	0
H/TOT	259	31	2	5	3	2	0
17:00	67	9	1	0	0	1	0
17:15	81	4	0	0	0	0	0
17:30	59	2	2	1	0	1	0
17:45	49	4	1	1	0	0	0
H/TOT	256	19	4	2	0	2	0
18:00	48	2	2	3	1	0	0
18:15	57	5	1	1	0	0	1
18:30	41	4	0	1	1	0	3
18:45	57	0	1	3	1	2	7
H/TOT	203	11	4	8	3	2	11
P/TOT	2507	285	88	53	19	13	11

FROM ARM D						
B4429 (W)						
CAR	LGV	OGV1	OGV2	PSV	MCL	PCL
43	9	1	0	0	0	0
50	5	3	0	0	1	0
70	8	4	3	0	0	0
80	14	1	1	0	1	0
243	36	9	4	0	2	0
81	7	0	2	3	0	0
95	13	5	1	2	0	0
77	13	3	1	0	0	0
79	10	2	0	1	0	0
332	43	10	4	6	0	0
59	5	7	5	0	0	3
30	11	4	0	0	1	0
43	9	6	1	0	0	0
40	4	3	0	0	0	0
172	29	20	6	0	1	3
31	6	5	2	0	0	0
30	5	1	0	1	0	0
28	10	0	1	0	0	0
43	8	1	0	0	0	1
132	29	7	3	1	0	1
44	4	2	0	1	0	0
49	6	1	1	0	0	0
41	6	1	1	0	0	0





Representation Form for Local Plans



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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*

2. Agent's Details (if applicable)

**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.*

Title		Mr
First Name		Jacob
Last Name		Bonehill
Job Title (where relevant)		Director - Planning
Organisation (where relevant)	Miller Homes	Tetra Tech RPS
Address Line 1		4<sup>th</sup> Floor
Line 2		1 Newhall Street
Line 3		Birmingham
Line 4		
Post Code		B3 3NH
Telephone Number		
E-mail Address (where relevant)		

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?

Paragraph		Policy	H2	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

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.

Policy H2 Affordable Housing

This response should be read in conjunction with our responses to draft Policy S2.

This policy seeks the provision of affordable housing on qualifying sites (ten or more dwellings).

Criteria A is intended to be applied as a 'minimum' requirement (at least 20% within Rugby town and at least 30% elsewhere in the Borough on non-Green Belt sites). However, the Whole Plan Viability Study (WPVS) concludes that where developments are of 'strategic' scale they may not be able to viably absorb the additional infrastructure required, as well as providing 30% affordable housing (WPVS, para 1.7). The uncertainty around the ability of the Plan to achieve the desired percentage contribution on qualifying sites does not justify the use of a minimum standard for securing affordable housing in Policy H2. This potentially undermines the effectiveness of the policy when applied to specific proposals at the planning application stage. This is not a justified or positively prepared strategy. It is not soundly-based.

The policy should incorporate greater flexibility to recognise that viability circumstances are likely to fluctuate over the plan period. This will ensure schemes can be brought forward with greater confidence that the contributions proposed are deliverable. This will ensure the policy is effective for its stated purpose. We recommend the wording 'shall' and 'at least' in criteria A should be deleted and replaced with 'should'.

Criteria E sets out the detailed formula for calculating off-site financial contributions. Whilst we acknowledge the use a formula is reasonable in principle, it does not constitute a policy criteria against which proposals can be assessed. It simply defines how a number should be calculated. This is not an effective approach for determining applications. This paragraph would be better suited to the supporting text or separate guidance note, which can be kept up to date as when changes are required to ensure it properly supports the delivery of affordable homes throughout the plan period. We recommend that criteria E is moved to the supporting text.

(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.

- The wording 'shall' and 'at least' in criteria A should be deleted and replaced with 'should'.
- Criteria E should be moved to the supporting text / separate guidance note.

(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:

In order to present our clients views in response to discussion at the hearings.

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.

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.

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Last Name		Bonehill
Job Title (where relevant)		Director - Planning
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Line 3		Birmingham
Line 4		
Post Code		B3 3NH
Telephone Number		
E-mail Address (where relevant)		

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?

Paragraph	1.1	Policy		Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

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.

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Plan Period

Paragraph 1.1 of the PSLP proposes a timeframe for the plan that will now cover the period 2025-2042 (17 years). The explanation for this approach is set out in the Development Topic Paper (December 2025), which states the base date is set at 2025 as this is the year of the local housing need calculation which underpins (draft) Policy S2. This means that the plan period would run 1 April 2025 until 31 March 2042 (para 1.6). The preferred timeframe set out, and consulted on, in the draft Local Plan was 2024-2045 (or 21 years).

We highlighted in our Regulation 18 consultation responses a number of issues with the draft Plan timeframe (which was longer than the period now being proposed in the PSLP). We highlighted that the plan period did not align with neighbouring plans (notably the emerging South Warwickshire Local Plan, which runs to 2050). We see no reason why Rugby should not follow the same timeframe (end date of 2050). This would help ensure that development needs across the sub-region (Coventry and Warwickshire) are addressed on a consistent basis and would ensure effective cross-boundary engagement across the different plans and forthcoming Spatial Development Strategy for the wider area.

It also does not align with its own evidence on assessing development needs in the district (both employment and housing), which as assessed future needs across varying plan periods, none of which align with the final position now being taken. For example, the Updated Housing Needs Evidence for Rugby Borough (September 2025) refers to a 2025-43 period. The Addendum to the Coventry & Warwickshire Alignment Paper (November 2025) uses various periods (2021-45, 2022-45, and 2021-2050) all of which cover a 21-year period and none of which

align with the PSLP plan period. These are matters of soundness that remain unresolved. In addition, none of this evidence shows that the growth needs they assess cannot be delivered in the district, or the plan period should be curtailed.

In practical terms, the move from a 21-year to a 17-year plan period results in a change in the planned level of growth in the Plan from 12,978 (618 dpa) to 10,812 (636 dpa) dwellings. This equates to a reduction in the minimum number of homes to be planned amounting to 2,166 dwellings. Most notably, the main impact of this change is also evident in the strategy for homes (Policy S2), which results in a reduction in housing provision from 14,134 to 11,729 dwellings, an even greater reduction in supply of housing land over the shortened plan period (2,409 dwellings).

In addition, this approach assumes that the Plan will be adopted by no later than the start of April 2027. If it were to be adopted after this date then it would not cover the minimum-15 years on adoption as required by paragraph 22 of the 2024 Framework. This would then require the identification of additional sites to ensure that the plan can meet a minimum of 15 years of development requirements on adoption. This process on its own would most likely further delay the adoption of the Plan while sites are assessed.

The change in period, in our view, represents a 'hollowing out' of the growth strategy in the Plan for no other reason than satisfying the minimum 15-years for plan under the Framework (para 22) rather than being based on clear and justified evidence to demonstrate that previous planned levels of growth are now not deliverable, which does not exist. It is not a positively prepared strategy. It is not soundly-based.

(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.

Revert back to the previously preferred plan period (2024-2045) or apply a similar range using 2025 as the base date (for example, 2025-45).

Allocate additional land, including Lodge Farm, to address the increased requirement and provision of housing land.

(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.

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☐

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☒

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

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In order to present our clients views in response to discussion at the hearings.

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you wish to make.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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but complete the full contact details of the agent in 2.*

Title		Mr
First Name		Jacob
Last Name		Bonehill
Job Title (where relevant)		Director - Planning
Organisation (where relevant)	Miller Homes	Tetra Tech RPS
Address Line 1		4<sup>th</sup> Floor
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Line 3		Birmingham
Line 4		
Post Code		B3 3NH
Telephone Number		
E-mail Address (where relevant)		

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?

Paragraph	Criteria B	Policy	S2	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

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.

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Policy S2 Strategy for Homes (Housing Distribution)

Criteria B of this policy provides a table, which summarises the overall distribution of housing allocations and other sources identified to meet the housing requirement.

Overall distribution of housing

The breakdown in housing distribution proposed in Policy S2 is set out in Table 1 below, which shows the split between existing and new sources of housing. We also show the proposed distribution at the draft Plan (Regulation 18) consultation stage in 2025. This is a relevant point to illustrate here given the drastic reduction proposed to the plan period and the effect this would have on the overall housing requirement.

Table 1 Housing Distribution – draft Plan and PSLP

Source	Draft Plan	PSLP
	2025 (21 years)	2026 (17-years)
Existing strategic sites and other existing allocations, and extant commitments	9,746 (69%)	7,993 (68%)
New allocations (listed in Policy S6)	3,338 (23.6%)	2,886 (24.6%)

Small site windfalls (50 dpa)	1,050 (7.4%)	850 (7.2%)
Total	14,134	11,729

The Council needs to explain their reasoning so that parties, notably the Inspector, can understand how the Council has reached its final position in regard to the broad distribution strategy in the PSLP.

As illustrated in the table, the Council has maintained its previous approach (at Reg 18) which is to favour a 'more dispersed' strategy for distributing future housing growth across the Borough. Whilst Policy S2 provides a breakdown of individual components that make up these totals, the PSLP does not explain how these figures have been derived or on what basis the figures have been adjusted following the Reg 18 consultation.

Furthermore, the overall supply identified at Reg 18 consultation stage included an adjustment for non-implementation (10%) on sites with planning permission. This has since been removed, without any clear reasons why this is now not appropriate in the PSLP supply assumptions.

Focus on Rugby town

In terms of new allocations, Table 2 shows the proposed split in distribution by location and status (notably, whether the site is in a Green Belt or non-Green Belt location). This again shows the comparison between the two consultation stages.

Table 2 Proposed distribution of new site allocations – draft Plan and PSLP

Location	Draft Plan	PSLP
Rugby urban area sites ¹	1,190 (35%)	1,233 (43%)
Rural settlements (non-Green Belt) ²	420 (13%)	217 (7%)
Rural Settlements (Green Belt) ³	1,728 (52%)	1,436 (50%)
All new allocations	3,338	2,886

The PSLP (para 1.34) states that new homes are focused on Rugby, which, including existing commitments, will accommodate at least 75% of new housing. We highlighted in our Reg 18 responses our concerns regarding the continued 'focus on Rugby' as the basis for the wider distribution strategy. We can observe here the PSLP now proposes further growth at Rugby town (1,233 dwellings versus 1,190 at Reg 18 stage) over and above existing sources, despite the shortened plan period. Whether this remains as 75% of the overall supply for the Borough is not clear.

A further concern is that the PSLP now proposes even more growth within Rugby town (from 35% to 43% of all new allocations). However, this is at odds with the Urban Capacity Study evidence which identified a capacity of suitable, viable and available sites ranging between 511 and 825 dwellings on urban sites within

¹ Includes sites proposed at Rugby (site 62, 332, 353, 283, 350, 351, 354, 355, 279, 153, 294, 356, 349, 352, 357), Brownsover (59) and Houlton (338), which are all located within the Rugby Town boundary (Policy GP2)

² Sites 87, 100, 129, 172, 202, 307 (rural non-Green Belt)

³ Sites 54, 337, 315, 253, 316, 6, 81, 348, 39, 136, 358, 309 (rural Green Belt sites)

Rugby settlement (para 5.5). The PSLP does not resolve this disparity with any clarity or further evidence to explain the approach. It is not a justified strategy for the town. It is not soundly-based.

Distribution of growth to rural settlements

We also made representations at Reg 18 stage to the proposed reliance on growth at the rural settlements, including settlements located in the Green Belt. As shown in Table 2, this now amounts to 1,441 dwellings (or 50% of all new allocations) on 12 sites on the edges of Green Belt settlements.

National policy advises that Green Belt boundaries should only be altered where 'exceptional circumstances' are fully evidenced and justified⁴, and before concluding that such circumstances do exist the relevant authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development⁵. In addition, where land is proposed for release from the Green Belt through plan review, the 'Golden rules' should apply, including the provision of 50% affordable housing⁶.

The PSLP proposes the release of 12 sites from within the Green Belt. These are listed in Policy S6 and we highlight these in our response to the policy. The Council has issued a Stage 2 Contributions Assessment (December 2025) alongside the PSLP. This report presents the findings of the second stage of assessment of Green Belt land and provides more detailed analysis for land within selected sites being promoted for development sites (para 1.3). The assessment identifies 10 land parcels within the Green Belt. However, the assessment has only assessed two of the 12 Green Belt sites proposed for allocation in the PSLP (site 253 Lawford Fields Farm, Long Lawford, and 316 Land at Long Lawford). The remaining 10 sites were considered in the Stage 1 Contributions Study (Oct 2025) and identified as potential Grey Belt, so were not subject to the further Stage 2 Assessment.

Nonetheless, it is unclear what, if any, consideration has been given specifically to how any of these sites promote sustainable patterns of development, in particular in accordance with paragraph 110 and 115 of the Framework prior to these being proposed for allocation in the PSLP, contrary to national policy⁷. There is no information on this matter in either the Stage 1 or 2 Study. Without robust and adequate evidence, there are no exceptional circumstances to justify releasing these sites from the Green Belt for housing. It is not a soundly-based strategy.

It is also notable that the Council have not produced any substantive evidence demonstrating how they will meet the general requirement of paragraph 149 e) that Green Belt boundaries will not need to be altered at the end of plan period.

Taken together, we maintain our views submitted at the Reg 18 consultation stage that the vast majority of Green Belt sites at the rural settlements are not supported by sufficient (or any) relevant or up to date evidence, contrary to paragraph 32 of the Framework. The strategy based on Green Belt release is not justified, particularly in light of other non-Green Belt available to the Council (notably Lodge Farm). It is not soundly-based.

⁴ NPPF 2024, para 145

⁵ NPPF 2024, para 147

⁶ NPPF 2024, para 156

⁷ Paragraph: 011 Reference ID: 64-011-20250225

On this basis, we recommend that all 12 Green Belt sites are removed from the PSLP prior to adoption. These sites should be replaced by non-Green Belt sites, including Lodge Farm, elsewhere in the Borough.

(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.

- Delete the 12 Green Belt sites identified proposed under Policy S2 and listed in Policy S6 and Annex to the Plan.
- Replace these sites by allocating other non-Green belt sites elsewhere in the Borough including Lodge Farm to make up the shortfall in planned supply.

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

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☐

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☒

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

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Part A

1. Personal Details*

2. Agent's Details (if applicable)

**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.*

Title		Mr
First Name		Jacob
Last Name		Bonehill
Job Title (where relevant)		Director - Planning
Organisation (where relevant)	Miller Homes	Tetra Tech RPS
Address Line 1		4<sup>th</sup> Floor
Line 2		1 Newhall Street
Line 3		Birmingham
Line 4		
Post Code		B3 3NH
Telephone Number		
E-mail Address (where relevant)		

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?

Paragraph	Criteria A	Policy	S2	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

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.

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Policy S2 Strategy for Homes (Housing Requirement)

This policy now proposes a housing requirement for 10,812 dwellings between 2025-2042; an annual average of 636 dpa. This figure equates directly to the minimum of homes required under the standard method (updated December 2024).

The use of a minimum local housing need figure in the Local Plan has been taken directly from the figures calculated by Government under the new standard methodology set out in planning guidance. Nevertheless, the local housing need figure based on the standard method is an unconstrained assessment of need and consequently is only the first step in setting a housing requirement (which is different), as recognised in planning guidance¹. It should not, in all cases, be an end point for the Plan.

We highlighted in our Regulation 18 response to draft Policy S2 the important role the planning system can play in supporting the Government's wider objective of significantly boost the supply of homes², and that the housing requirement may be higher than the identified need³. Our response also pointed out that the housing requirement is the minimum number of homes that a plan seeks to provide for during the plan period, and that once local housing need has been assessed authorities should then make an assessment of the amount of new homes that can be provided in their area. The PPG advises this should be justified

¹ Paragraph: 001 Reference ID: 2a-001-20241212 Revision date: 12 12 2024

² NPPF 2024, para 61

³ NPPF 2024, para 69

by evidence on land availability, constraints on development and any other relevant matters⁴. This is guidance and policy at a national level that the Council has effectively ignored by reducing the scale of growth now being planned for in the PSLP based on shortening the plan period. It is not a justified or positively-prepared strategy. It is not soundly-based.

In assessing the amount of housing that can be provided in Rugby, a relevant consideration we highlighted at Reg 18 stage was past housing delivery in the district. The Council's own monitoring data (set out in Annual Monitoring Reports) shows that between 2011 and 2025, a total of 9,640 'actual net dwellings' were completed; an annual average of 688 dpa. This compares to an annual average requirement of 8,416 dwellings to that point (601 dpa). The adopted Plan has over-provided 1,224 dwellings during that period to date, which demonstrates a relatively strong market for housing exists in Rugby (AMR 2024/25). Furthermore, the current local housing need figure (636 dpa) is similar in scale to the adopted Plan target (663 dpa) and also the need consulted on at Regulation 18 (618 dpa). These factors do not point to any justification for limiting future growth by reducing the plan period by four years (see also separate response on Plan Period).

Furthermore, we argued in our Reg 18 response that further consideration should also be given to increasing the total housing figures to assist in the delivery of more affordable homes, in accordance with national policy⁵. The Framework Glossary defines affordable housing as, '*housing for sale or rent, for those whose needs are not met by the market*'. This includes Social Rent, Other Affordable Housing for Rent, Discounted Market Sales Housing, and Other Affordable Routes to Home Ownership⁶. Paragraph 63 of the Framework makes clear that in the context of establishing need (for housing) for different groups this should include 'those who require affordable housing'. Guidance also clarifies that, '*All households whose needs are not met by the market can be considered in affordable housing need*⁷.'.

The Council's Updated Housing Needs Evidence (September 2025) identifies a 'net' need for affordable housing of 338 homes per year for those unable to buy or rent. For those unable to purchase a home, but able to rent (at least in purely financial terms and other assumptions) the need increases to 474 homes per annum (at Table 5.7). We prefer this measure of need as it reflects 'all households' whose needs are not being met by the market (given the wider aspiration for home ownership, rather than renting privately). Whichever measure is used, affordable housing need in Rugby is over 50% of the minimum number of homes required under the standard method (currently 636 dpa), which we would argue represents an 'acute' need for affordable housing. By shortening the plan period by four years, this clearly undermines the ability of the Council to meet the scale of affordable housing need amongst households in the area. This is not a justified or positively prepared strategy. It is not soundly-based.

Government figures also show that 1,975 affordable homes were delivered in Rugby between 2011-2025⁸. Whilst we acknowledge that delivery has improved in recent years, this still equates to annual average of 141 per annum since 2011. In this context, it is evident that delivery of affordable homes in Rugby has lagged significantly compared to the ongoing need. This provides further justification for

⁴ Paragraph: 040 Reference ID: 2a-040-20241212 Revision date: 12 12 2024

⁵ Paragraph: 024 Reference ID: 2a-024-20190220 Revision date: 20 02 2019

⁶ Reference also made to different forms of affordable tenure in paragraph 66 of the Framework

⁷ Paragraph: 018 Reference ID: 2a-018-20190220

⁸ [Live tables on affordable housing supply - GOV.UK](#)

not shortening the plan period or reducing allocation of land for housing, but instead the Council should be increasing the plan period and increasing the allocation of land in the PSLP.

In spite of this, the Council has sought to find any reason it can to justify why it should not allocate more land in order to increase the delivery of affordable housing. The Council's position is set out in the Development Need Topic Paper December 2025 (paras 2.49-2.54). The commentary does not address the past delivery rates of affordable housing outlined above, or explain how many affordable homes are expected to be delivered over the plan period and how this would compare to the need going forward. We refute the Council's view that sufficient action is being taken to address affordable housing needs in setting the housing requirement in the PSLP.

For the reasons set out above, we argue the Council's approach to affordable housing need and the housing requirement (and plan period) is not a justified or positively prepared strategy. It is not soundly-based.

The effect would be to increase the housing requirement to 16,536 (636 dpa over 25 years, 2025-2050). The additional supply of land could be addressed, in part, through the allocation of additional non-Green Belt land, notably the Lodge Farm site. This should also accommodate the 8.5% flexibility buffer outlined in paragraph 1.22 of the PSLP.

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

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- Modify the plan period so that it reflects the evidence base (up to 2050, or at least back to 2045)
- Increase the housing requirement and allocation of land for housing in the Plan, accordingly, to align with a positively prepared period.

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

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**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.*

Title		Mr
First Name		Jacob
Last Name		Bonehill
Job Title (where relevant)		Director - Planning
Organisation (where relevant)	Miller Homes	Tetra Tech RPS
Address Line 1		4<sup>th</sup> Floor
Line 2		1 Newhall Street
Line 3		Birmingham
Line 4		
Post Code		B3 3NH
Telephone Number		
E-mail Address (where relevant)		

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?

Paragraph		Policy	S4	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

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Policy S4 Gypsy & Travellers

The Framework (2024) states in Paragraph 63 “*the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy...*”. These groups include households from the gypsy and travellers community. A footnote in the NPPF then states ‘*Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document*’.

The 2024 Planning Policy for Traveller Site (PPTS) document states that ‘local planning authorities should make their own assessment of need for the purposes of planning’ and ‘ensure that their Local Plan includes fair, realistic and inclusive policies’ and ‘to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply’.

The Rugby Borough 2025 Gypsy and Traveller Accommodation Assessment (GTAA) provides the latest available evidence to identify the accommodation needs of Gypsies and Travellers and Travelling Showpeople across the borough. This was dated February 2025 and informed the draft Plan consultation. Further to this, a ‘position note’ has been issued alongside the pre-submission consultation, dated 10 December 2025.

The PSLP (paragraph 1.29) identifies a need for 94 pitches (1 April 2024 to 31 March 2042) based on the GTAA findings. Against this need, a total supply of 68 pitches have been identified, which provides sufficient supply to ‘beyond 2035’ according to the Council. This leaves a ‘residual shortfall’ of 26 pitches, which are

expected to be met through determining windfall sites in accordance with Policy S4 and other relevant policies in the PSLP. It is not clear from the Council's evidence base whether this level of windfall provision is realistic based on past delivery as no details are provided. Even if the need for 2024/25 is removed based on a net need for 5.2 pitches (GTAA, Table ES1), this still leaves a shortfall of 21 pitches which has not been addressed.

In this context, the GTAA recommends a number of measures that the Council should consider further in developing a sound policy framework for addressing traveller needs in the PSLP. These include recommendations to review the potential for additional pitch development on existing sites and the occupancy of permanent pitches.

The GTAA also highlights the issues of unauthorised encampments, with 50% of such encampments comprising 10 or more caravans. The GTAA recommends the Council should consider how land can be provided for short-term use and particularly in response to the Police, Crime, Sentencing and Courts Act. The GTAA recommends that the Council continues discussions with local planning authorities across Warwickshire to determine the level of need and how this could be provided for. It is recommended that councils identify areas of land that can be used for smaller encampments (up to 5 caravans), medium-sized encampments (between 5 and up to 10 caravan) and larger encampments (more than 10 caravans). According to the GTAA, there is currently no provision to address transit need in Rugby Borough.

And based on the views of local marina owners/managers, the GTAA identifies a need for at least 20 moorings for houseboats within Rugby Borough.

In response, Policy S4 makes provision for 45 additional pitches on proposed allocations (over and above consented sites) and a criteria-based policy to deal with 'windfall' applications.

It is unclear whether the Council has assessed the potential for additional pitch development on existing sites and the occupancy of permanent pitches to address the shortfall, or considered the issue of unauthorised encampments in the Borough, both specifically recommended in the GTAA. This is contrary to paragraph 63 of the Framework, which requires that the needs of the gypsy and traveller are assessed (as in the GTAA) and reflected in planning policies.

Furthermore, national guidance on planning for gypsy and travellers¹ advises that in producing their Local Plan Council should identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets (para 10). The PSLP does not set out a five-year land gypsy and traveller supply calculation, which should also include an appropriate buffer. This further demonstrates the PSLP is not consistent with national policy (NPPF, para 72a).

Taken together, Policy S4 is inconsistent with national policy on planning for gypsy and travellers needs. It is not a soundly-based strategy.

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

¹ Planning policy for traveller sites, December 2024

The PSLP should address the shortfall in supply of pitches in line with recommendations in the GTAA.

The PSLP should provide an up to date G&T land supply calculation on adoption, including an appropriate buffer.

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

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but complete the full contact details of the agent in 2.*

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First Name		Jacob
Last Name		Bonehill
Job Title (where relevant)		Director - Planning
Organisation (where relevant)	Miller Homes	Tetra Tech RPS
Address Line 1		4<sup>th</sup> Floor
Line 2		1 Newhall Street
Line 3		Birmingham
Line 4		
Post Code		B3 3NH
Telephone Number		
E-mail Address (where relevant)		

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?

Paragraph		Policy	S6	Policies Map	
Site ID					

4. Do you consider the Local Plan:

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

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Policy S6 Residential Allocations

This policy identifies a total of 2,886 dwellings projected to come forward on 35 sites. This is an increase in the number of sites (from 25) proposed at the draft Plan stage, despite a reduction in the overall housing requirement, and about 500 fewer homes on new allocations specifically (from 3,338 dwellings on allocations) in the PSLP. This now includes 12 sites located in the Green Belt, totalling 1,436 dwellings (about 13% of the local housing need).

Green Belt

We have set out our soundness concerns in regard to the significant focus for growth on Green Belt settlements under our response to Policy S2. We reiterate the point here that only two Green Belt sites (site 253 and 316) were assessed in the Stage 2 GB Contributions study (December 2025), which is most up to date assessment of sites in the Green Belt used to inform the PSLP. One of these (253) is a new site that was not previously supported at draft Plan stage.

The remaining 10 Green Belt sites were not considered in the Stage 2 Green Belt evidence. The Council state that these sites were located within areas identified as 'grey belt' sites in the Stage 1 Contributions Study (October 2025), and so did not require further assessment (though the sites are not specifically identified anywhere within the Stage 1 study). Each of these sites should be assessed individually in terms of their own merits to ascertain whether they are Grey Belt rather than simply at a high level if the Council is seeking to rely upon them as allocations. Nonetheless, the Framework makes clear that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should

determine whether a site's location would be appropriate for the kind of development proposed and accord with paragraph 110 and 115 of the Framework¹, which seek to limit the need to travel and offering a genuine choice of transport modes. The fact (or otherwise) that a site may be classed as grey belt does not alter this requirement, given it is a core consideration in ensuring the Plan is supporting the achievement of sustainable development (and thus soundly-based).

However, neither the Stage 1 or Stage 2 Contributions Study have specifically addressed the requirements in paragraph 148 on a site-by-site basis to support the justification for releasing each site from the Green Belt for residential use. This exercise also has not been carried out in the Green Belt Exceptional Circumstances Paper (Dec 2025). The evidence does not demonstrate that any of these sites would promote sustainable patterns of development in the context of paragraphs 110 or 115. This is clear gap in the evidence base on releasing Green Belt land for development in the PSLP.

It is also notable that the Council have not produced any substantive evidence demonstrating how they will meet the general requirement of paragraph 149 e) that Green Belt boundaries will not need to be altered at the end of plan period.

Sites at Long Lawford

In regard to the two sites proposed at Long Lawton that were assessed in the Stage 2 assessment, the Council's own evidence (Exceptional Circumstances Topic Paper December 2025) conclude these sites do not constitute Grey Belt. The Stage 2 assessment (para 3.8) also concludes that both sites would further erode Long Lawford's fragile separation from Rugby. It also concludes that the developments would be incongruous with the urban pattern and not restricted and contained. Despite this damning indictment of the sites, the Council still considers it appropriate to release these sites for development. The Exceptional Circumstances Topic Paper (paras 3.8-3.10.1) does not identify any site-specific circumstances to justify the approach on the Long Lawton sites.

Paragraph 2.118 of the Exceptional Circumstances Topic Paper states that the Viability Assessment shows that Green Belt villages have the highest values in the Borough, and that therefore sites released from the Green Belt will deliver 40% affordable housing due to the application of the Golden Rules. However, Appendix 3 sets out the Land Registry sales data that has been used to inform this position. While it may be correct in general terms that sales values in the Green Belt villages are higher than elsewhere in the district the evidence relied upon to reach this conclusion has not considered any examples from Long Lawford. Long Lawford has a post code area of 'C23 9', but the only C23 sales data referred to is for properties within the 'C23 0'. Noting the proximity of Long Lawford to Rugby in the absence of any specific evidence it is not unreasonable to assume that values may be lower in this location than in other parts of the Green Belt. Given the reliance of the overall strategy of the Plan on housing delivery at Long Lawford of 650 homes the Council should provide evidence on potential values for this location.

Lawfords Field Farm (Site 253) would lead to coalescence between Long Lawford and Rugby, which the submission plan proposes to address through restricting development to the northern part of the site. However, if this development were allowed to go ahead it would likely lead to the future development of the Green Belt land to the east of the proposed allocation on the edge of Rugby, as this land

¹ NPPF 2024, para 148

would be contained almost entirely on three sides by built development. This would in effect create a new area of 'Grey Belt' which would mean that this proposed allocation would be contrary to parts e) and f) of paragraph 149 of the NPPF.

Similarly Land at Long Lawford (Site 316) would also not meet the requirements of parts e) and f) of paragraph 149 of the NPPF. The Stage 2 Site Assessment states that there will be focus on a strong future Green Belt edge on the southern site boundary, but it is not clear how this would use physical features that are readily recognisable and likely to be permanent as required by part f). If both Sites 253 and 316 are released from the Green Belt an area of Grey Belt would be created between the two, so part e) would not be met either.

Viability Assessment

We have reviewed the Viability Assessment and in addition to the above specific point on the lack of evidence of sales values at Long Lawford, we have a number of other concerns:

- While the report summarises the results of the appraisals for each of the typologies and provides the assumptions that have informed the appraisals, the actual appraisals themselves are not provided. So it is not possible to fully interrogate the appraisals and confirm that the assumptions have been applied as indicated.
- In terms of the typologies tested it is unclear why no development typologies of between 200 and 500 homes have been considered. Particularly given the reliance of the plan on 3 allocations of 250 homes each (sites 338, 315, 253), one of 285 homes (site 59) and one of 400 homes site 316). Given the viability changes for larger sites indicated by the evidence so far, the evidence should consider the viability of typologies in these ranges.
- We note that paragraphs 6.27 to 6.29 and tables 6.28.1 to 6.28.6 state they cover testing of the cumulative impact of emerging policies. However, the figures in this table are expressed as the overall BLV whereas in the earlier tables the figures are expressed as £ per sqm so it is difficult to compare across the two sections. As the individual appraisals have not been made available it has not been possible to confirm that the cumulative assessments have been undertaken correctly.
- There appears to be an error on the base cost and total (before policy costs) stated for Houses in table 4.15.1 as the base cost is higher than the total cost. As the appraisals have not been provided it is unclear whether this error has been included in the appraisals themselves.
- Paragraph 4.18 states that an assumption has been made on the cost uplift of achieving net-zero carbon through on-site solutions, but actual evidence has been provided to support this assumption.
- There is no explanation or evidence of any assumption that has been applied for implantation of the Future Homes Standard.
- The profit of 17.5% GDV for market development is not appropriate. While the commentary at paragraph 4.33 is noted we do not agree that the market has remained relatively resilient, particularly in light of recent events particularly in the Middle East. 20% should be applied given the significant level of uncertainty currently.
- It is not clear why a blanket 7% professional fees has been applied across all typologies. We would typically expect to see 10% used for developments under 50 dwellings.
- Similarly, while there is reference at Table 6.30.1 to 5% contingency costs being assumed for Lodge Farm and North West Rugby "in line with main

appraisal assumptions” there is no explanation of this figure in the assumptions section of the report and it is not apparent what it has been applied to.

Noting that the viability assessment of Lodge Farm is relied upon as a key reason for not selecting the site, we have also reviewed the specific appraisal for it which is included at Appendix 12 of the Viability Assessment and have the following observations:

- As set out in the accompanying **Transport / Mobility Representation** prepared by SLR (see Appendix B) we strongly contest the need for the proposed strategic transport interventions including the A46 bypass road, the A45/M45 Thurlaston Interchange, the A5/A428 Halfway House Roundabout, and Norton Lane / A361. We note as well that the appraisal appears to include an erroneous £1,555,000 for A426 roundabout widening, but this is not included in the list set out in table 6.31.1.
- The values set out in the report for affordable housing have not been applied in the appraisal. Instead, it appears that a different lower set of assumptions have been applied.
- The assumptions for residential areas also appear to differ from the 94 sqm average GIA used for the rest of the study.
- The assumed total sales rate of 180 units per annum is not agreed with. We suggest that the total open market sales rate per annum should instead be 180 units, on the basis of 3 open market units per month, with 5 flags at any one time. Which would bring the overall sales period down from 14 years to 10.5.
- The community floorspace revenue is only applied to 10% of the floor area.
- The commercial floorspace build rates don't equate to the rates quoted in the report.
- We consider that sales values should be increased above £340 per sqft to £344.
- We consider the proposed costs for the Secondary and Primary schools to be excessive. While we note that these costs draw upon costs currently applied to South West Rugby, they were introduced through an update to the South West Rugby Masterplan SPD, and have not been tested through Examination or at an Appeal. Critically the evidence used to inform these costs has not been provided and so it is not possible to confirm whether these costs are reasonable and justified.
- We note that 30% affordable housing has been assumed on the basis that the site is greenfield. It is not unusual for larger sites with significant wider public benefits arising from associated infrastructure provision to have lower affordable housing requirements. In particular such sites still achieve a substantial overall quantum of affordable housing. They also have the prospect of securing future value uplift and the ability to support increased affordable housing provision over their longer delivery period as they raise values through the associated wider placemaking that they offer. Smaller schemes are not capable of doing this.

On the basis of the points made above we do not consider the viability evidence provided so far to be sufficient. The Viability Assessment should be reviewed and updated. The current proposed site allocations are based on flawed evidence and should be reviewed following an update of the Viability Assessment. This should include further consideration of allocating Lodge Farm, in place of unjustified Green Belt releases, based on the comments made above and in response to other elements of the current consultation including in particular our response to the Sustainability Appraisal.

Taken together, the case for releasing any of these sites from the Green Belt has not been adequately made, is not proportionate and so the strategy is not sufficiently justified. In our view, exceptional circumstances have not adequately shown to exist to justify releasing them from the Green Belt. It is not soundly-based. We recommend that the 1,436 dwellings directed to the Green Belt sites is redirected to non-Green Belt sites, including Lodge Farm.

(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.

- Delete all Green Belt sites from the Plan.
- Include Lodge Farm as an allocation for 1088 homes during the plan period. With a further 1592 beyond the proposed plan period.

(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.

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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)

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In order to present our clients views in response to discussion at the hearings.

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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*

2. Agent's Details (if applicable)

**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.*

Title		Mr
First Name		Jacob
Last Name		Bonehill
Job Title (where relevant)		Director - Planning
Organisation (where relevant)	Miller Homes	Tetra Tech RPS
Address Line 1		4<sup>th</sup> Floor
Line 2		1 Newhall Street
Line 3		Birmingham
Line 4		
Post Code		B3 3NH
Telephone Number		
E-mail Address (where relevant)		

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?

Paragraph		Policy	Sustainability Appraisal	Policies Map	
Site ID					

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	
(2) is Sound	Yes		No	<input checked="" type="text"/>
(3) complies with the Duty to co-operate	Yes		No	

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.

Sustainability Appraisal

The Framework defines the relationship between the Local Plan and Sustainability Appraisal. It makes clear that local plans should be informed throughout their preparation by a sustainability appraisal (SA) that meets the relevant legal requirements¹. Planning guidance also makes clear that Sustainability appraisal should be applied as an 'iterative' process informing the development of the plan². This is critical because if the Local Plan is to be soundly-based it must be a justified and appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence (NPPF, para 36).

The Council has now issued its final iteration of SA 'Sustainability Appraisal (SA) of the Rugby Borough Local Plan: *SA Report, December 2025*' ('fSA'). This follows on from the SA Scoping Report published at the Issues and Options consultation stage, and Interim SA dated March 2025 issued for the draft Plan consultation. The fSA seeks to explain the reasons for selecting the alternatives dealt with (Defining Growth Scenarios, chapter 5), present an appraisal of the reasonable alternatives (Growth Scenario Appraisal, chapter 6), and explain the Council's reasons for selecting the preferred option (The Preferred Approach, chapter 7).

¹ Such 'relevant' legal requirements refers to Strategic Environmental Assessment, which is defined as a procedure (set out in the *Environmental Assessment of Plans and Programmes Regulations 2004*) which requires the formal environmental assessment of certain plans and programmes (including Local Plans) which are likely to have significant effects on the environment (see definition in the NPPF Glossary)

² Paragraph: 001 Reference ID: 11-001-20190722 Revision date: 22 07 2019

We made representations on the process of SA undertaken as part of the draft Plan consultation in 2025. Our responses presented here provide an update to those earlier representations in light of the Final SA.

Defining Growth Scenarios

Chapter 5 of the fSA seeks to explain the process that led to the definition of reasonable alternatives (RA). These, the fSA says, are in the form of 'growth scenarios' (para 5.1.1). This continues the approach presented in the Interim SA.

Figure 5.1 of fSA illustrates the 'standard' broad process to define RA growth scenarios applied in undertaking SA for the PSLP. This clarifies how individual reasonable alternative site options have been taken into account in the SA process. Firstly, it describes site options as being 'non-SA workstreams'. We assume this is the case because the process of site selection and rejection has followed a separate process; set out in the Stage 2 Site Assessment Report (December 2025).

This is the first problem with the fSA. At a broad level, it is unclear how the SA process has informed the selection of individual housing allocations relative to those other reasonable alternatives that have been discounted. This is because the site assessment report clearly states that the Sustainability Appraisal draws on the outputs of the Stage 2 Site Assessment and other evidence base documents (page 7). The SA is described as being 'Stage 3' of the site assessment process (or Stage 2b in the Site Selection Methodology Report). However, the Stage 2 (2a) assessment process has already selected the proposed sites for allocation. This is confirmed in the fSA (at para 5.3.7). Similarly, it is unclear how SA has informed or influenced the appraisal of individual reasonable site options before the final choices have been made on the proposed allocations set out in the PSLP. Without a clear explanation of how the SA has influenced the choice of site allocations, it cannot be said the SA has applied an 'iterative' process informing the Plan. The SA is not soundly-based.

This feeds into our second concern, whereby site options (alongside 'Strategic Factors') have fed into what are described as 'Sub-Area Scenarios'. The Sub-Area Scenarios have then informed the 'Reasonable Alternative Growth Scenarios'. These are 'groups' of sites forming the RA Growth scenarios as part of the appraisal process. This means the fSA has jumped straight into appraising selected groupings of sites without any prior appraisal of individual site options. This is a key problem with the SA from the outset of the process. There has been no appraisal of any individual residential site options against the SA Objectives prior to selecting the final sites (or even the preferred option sites in 2025); this includes no appraisal of the Lodge Farm site. The SA must appraise reasonable alternatives (which comprise individual site options) against the SA Objectives in order to understand the likely significance of effects. This is a fundamental aspect of SA.

Consequently, we still have very limited understanding of what the effects (or significance of effects) of development on the selected sites is likely to be relative to the other reasonable alternatives that have been discounted. The SA is not soundly-based.

The Council has attempted to justify their approach, at paragraph 4.2.5 of the fSA. It states that "*Whilst individual site options clearly generate interest, they are not RAs [reasonable alternatives] in the context of most local plans...*". We fundamentally disagree. It is simply unreasonable and illogical to make such a suggestion. Individual site allocations (and thus the options they are drawn from) form a key plank of any local plan in meeting the development needs of their area. This is no different to Rugby.

Such an approach would also contradict virtually every other local plan that has ever been adopted, where specific sites have been identified and allocated to meet the development needs of their areas. To suggest that individual sites do not constitute reasonable alternatives is erroneous and unfounded. There is no justification that such an approach is appropriate for this local plan. The approach appears to be an attempt to side-step an important and necessary step in the process of allocating appropriate sites for residential development in the Plan. This error represents a major gap in the SA process necessary to ensure that reasonable (site) alternatives have been appraised on a fair and consistent basis. If not remedied, the whole basis of the SA in relation to site appraisal for potential residential allocations is fundamentally flawed and we would be making the reference throughout the Examination stage, drawing on the extensive Case Law on the matter (*Forest Heath, Newmarket, Heard* etc). This undermines the credibility of the SA process as a whole. At the very least it is not soundly-based.

Reasonable Alternative Housing Growth Scenarios

Section 5.5 of the fSA defines what the Council consider to be 'reasonable alternative residential growth scenarios'. These are first presented as 12 'settlement growth scenarios' set out in Table 5.1 of the fSA. The settlement growth scenarios have then been further rationalised into 8 RA Housing Growth Scenarios (listed at paragraph 5.5.10). The breakdown in projected supply across each scenario is shown in Table 5.2.

Whilst the fSA defines these as 'growth scenarios' they are, in reality, simply groupings (or 'packages') of individual site options presented in different combinations. We acknowledge that Lodge Farm has been taken forward at this stage (Scenario 8) which we support. However, none of these groupings of sites are based on any site-specific appraisal to help inform judgments on the likely significance of effects of the housing growth scenarios, or as a basis for appraising cumulative effects from the grouping of sites. They are not an adequate basis for further options testing of housing growth options. The process by which the reasonable alternative growth scenarios for housing have been identified is not robust or adequate. It is not soundly-based.

Growth Scenario appraisal

Section 6 of the fSA then provides a commentary on the appraisal of the 8 housing growth scenarios.

At the broad level, the fSA doesn't present any detail of the appraisal process followed; it simply provides a written commentary on the opportunities of each site/settlement, rather than based on a systematic appraisal of options against the SA objectives. In most cases, only four scenarios are referred to in the assessment (Long Lawford, South of Rugby, NW Rugby, and Lodge Farm) rather than all scenarios. Such an approach is arbitrary in nature and results in an unbalanced assessment. This was a matter highlighted in case law in the *Heard* judgment³. It is not soundly-based.

Appraisal of Lodge Farm (omission site)

Table 6.1 of the fSA provides a summary of the scenario appraisal. The appraisal scores Scenario 8 (which includes Lodge Farm) as 'significant negative' effects in terms of the 'accessibility' and 'transport'. Given the problems highlighted above, we do not agree with the findings applicable to the Lodge Farm site.

SAO - Accessibility

The emerging proposals for Lodge Farm include the provision for new education facilities, along with potential to support transportation of children from the

³ *Heard v Broadland DC* [2012] EWHC 344 (Admin) (24 February 2012) (para 71)

development to schools elsewhere in the borough. Lodge Farm is able to support provision for both primary and secondary school places, whichever is considered necessary to meet future demand. This approach would accord with the SA Framework (Table 3.1) for this objective (*Ensure good access to schools and other services / facilities*). Notably Lodge Farm is the only proposal that includes new Secondary School provision.

We submit further evidence in the form an updated **Education Note** which addresses the Council's re-appraisal on education matters (see Appendix A). As it sets out the benefits associated with the proposed education provision at Lodge Farm have not been acknowledged. In addition the Infrastructure Delivery Schedule does not any information about the locations that further education provision is required in. There is a reliance on it being 'technically feasible' to expand up to three secondary schools, but this does not demonstrate that to these expansions are deliverable.

On this basis, we maintain our view that the appraisal of Lodge Farm under the Accessibility objective is without merit and should be revised to 'positive'.

SAO Transport

Under 'transport', the fSA says (para 6.2.51) the key issue for Lodge Farm is potentially around traffic affecting the area including Dunchurch (A426/B4429). The Council also consider a solution 'is difficult to envisage' including likely no potential to deliver an eastern bypass to the village (given heritage constraints). The Council points to further work carried out following the draft Plan consultation stage that serves to indicate that the necessary transport upgrades may well not be achievable without making the scheme unviable. Unfortunately, the site promoter and transport consultants have not seen this latest work or been engaged in its production, and so it is difficult to offer a firm view on this at this stage.

Furthermore, despite assurances given in the updated Vision Document submitted in 2025, the Council continues to promote the view there will be major viability challenges after having factored in the cost of major upgrades, including grade separation at the Thurlaston interchange (A45/M45 junction) and an A45 bypass of the new village.

We do not agree with this assertion. Attached to this submission is a **Transport / Mobility Representation** prepared by SLR (see Appendix B) which concludes that any concerns relating to network/traffic capacity, feasibility of securing a step change in mobility improvements including public transport, active travel accessibility, and safe crossing of the A45, can all be addressed in a sustainable, policy-compliant manner. This includes concerns around traffic capacity, congestion, and safety issues suggested at Dunchurch. The assessment of Lodge Farm under the Transport objective is also without merit and should be revised.

SAO Landscape and Townscape

While it is noted that landscape sensitivity was a key consideration for the previous Local Plan Inspector as stated at 6.2.44, the assessment of the site does not acknowledge that the proposals for Lodge Farm have been amended to address these concerns as set out in the previously submitted **Landscape Technical Report** (see Appendix Z). It is also notable that concerns are raised about the potential for future development towards Willoughby, when this is not being proposed at this stage, and would appear to be contrary to the statement at 6.2.29 that "*There would be a significant landscape gap to the rural village of Willoughby to the south, and this would be retained in perpetuity given flood risk zones*"

Taken together, the appraisal of the housing growth scenario for Lodge Farm is not robust or adequate. It is not soundly-based.

Consequently, for these reasons, the fSA has not adequately informed the pre-submission Plan and is not soundly-based.

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

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The SA needs to be updated to address the points raised above.

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

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