

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		Miss
First Name		Victoria
Last Name	Mr A Russell, Ms C
Ridgley, Ms L Pugh and
Ms A Pugh	Cutmore
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
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	S2 Strategy for Homes	Policies Map	X
Site ID					

4. Do you consider the Local Plan:

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

Affordable Housing Need

The Updated Housing Needs for Rugby Borough September 2025 confirms that the net need for affordable housing is 474 dwellings. The net need is calculated as follows:

Net Need = Current Need (allowance for) + Need from Newly Forming Households + Existing Households falling into Need – Supply of Affordable Housing

It should be noted that the current need has been incorrectly calculated for the period 2025-2043 and not the plan period 2025-2042. With this adjusted to the plan period the current need is increased from 49 affordable homes per annum to 53 (882 divided by 17 instead of 18). As such the net need over the plan period 2025-2042 is 478 affordable homes per annum not 474.

Following this through the total gross need for people unable to buy OR rent needs to be increased from 568 to 571 affordable homes per annum. The net need for people unable to buy OR rent then needs to be increased from 338 to 341 affordable homes per annum. When 'existing households falling into need' is then discounted the net

need is increased from 202 to 205 affordable homes per annum (or an increase in 51 affordable homes over the plan period).

The Development Needs Topic Paper December 2025 states that *"The Updated Housing Needs Evidence for Rugby Borough (2025) identifies a net need for affordable housing of 338 homes per year for those unable to buy or rent. If those already in accommodation are excluded, this reduces to 202 homes per year. This is equivalent to 32% of the standard method figure."* As above the net need is actually 341 and the net need with those already in accommodation discounted is 205 homes per annum. This is equivalent to 32.2% of the standard method figure (increased from 31.8%).

The Draft Local Plan makes provision for 11,729 (including the 8.4% buffer) over the plan period including 2,886 new allocations at Policy S6. Policy H2 Affordable Housing sets out the affordable housing provision for different areas within the borough being:

- i. Within the Rugby urban area: 20%
- ii. Elsewhere in the borough: 30%
- iii. On sites released from the Green Belt through this plan or other Green Belt permissions: 40%

An assessment of the sites allocated under Policy S6 indicates that they would only deliver approximately 885 affordable homes (subject to viability), an average of only 30.7% affordable homes provision (see below). It should be noted that some sites are allocated 10 units and could be reduced by the developer so as to not trigger affordable housing provision. Likewise, West Farm and Home Farm, Brinklow and Land north of Warwick Road, Wolston include specialist homes for over 55s. Some of these homes may be C2 rather than C3 and thus wouldn't contribute toward affordable housing provision.

Site	Units	Affordable Units and %
Morgan Sindall House, Rugby	90	18 (20%)
Albert Street, Rugby	25	5 (20%)
Town Hall, Rugby	114	23 (20%)
Rugby Central Shopping Centre	200	40 (20%)
Rounds Gardens, Rugby	70	14 (20%)
North of Rounds Gardens, Rugby	60	12 (20%)
92 Lower Hillmorton Rd, Rugby	34	7 (20%)
Land adjacent to 44 Craven Road, Rugby	5	0
Stagecoach Car Park, Rugby	32	7 (20%)
Westway Car Park, Rugby	24	5 (20%)

Land adjacent 9 Railway Terrace, Rugby	14	3 (20%)
The Railings (NHS) Rugby	10	2 (20%)
28-29 High St, Rugby	8	0
Former snooker hall, Railway Terrace	7	0
Land to rear of Albert St, Rugby	5	0
Land south of Crick Road, Houlton	250	50 (20%)
Newton Manor Lane, Brownsover	285	57 (20%)
Oakdale Nursery, Brandon (adj Binley Woods)	43	18 (40%)
West Farm and Home Farm, Brinklow	75	30 (40%)
Land south of Rugby Road, Brinklow	250	100 (40%)
Land N of Lilbourne Rd, Clifton upon D'more	60	18 (30%)
Newton Road, Clifton upon Dunsmore	80	24 (30%)
North Road, Clifton upon Dunsmore	10	3 (30%)
Lawford Fields Farm, Long Lawford	250	100 (40%)
Land at Long Lawford	400	160 (40%)
Elizabeth Way, Long Lawford	5	0
Hillcrest Farm, Newton	25	8 (30%)
Land at High St., Ryton-on-Dunsmore	37	15 (40%)
Fosse Way, Stretton-on-Dunsmore	3	0
Land W of Fosse Way, Stretton-on-D'more	40	16 (40%)
The Croft, Stretton-on-Dunsmore	70	28 (40%)
Dyers Lane, Wolston	15	6 (40%)
North of Warwick Rd, Wolston	80	32 (40%)
Land at Coventry Road, Wolvey	60	24 (40%)
Land north of B4109, Wolvey	150	60 (40%)
Total	2886	885 (30.7%)

As such, whilst the affordable housing need makes up some 32.2% of the local housing need using the standard method, it is considered that the allocations could only deliver

approximately 30.7% given the 20%, 30% and 40% targets on different sites and the emphasis on the Rugby urban area. This represents a shortfall of approximately 10 affordable homes per annum or 170 over the plan period. On this basis it is considered that the draft Local Plan could not deliver its affordable housing need without an uplift to the housing provision.

As such, this is considered to provide evidence that suggests that the housing provision should be uplifted beyond the minimum local housing need to ensure that more of the need for affordable housing can be met over the plan period.

The Planning Practice Guidance (PPG) sets out at Paragraph: 001 Reference ID: 67-001-20190722 that *“This need [for particular groups] may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method.”* It goes on to add that *“Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:*

- *the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);*
- *the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and*
- *the anticipated deliverability of different forms of provision, having regard to viability.”* [Emphasis added]

The Planning Practice Guidance adds at Paragraph: 024 Reference ID: 2a-024-20190220 that *“The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. **An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.**”* [Emphasis added]

At present the Plan would not meet the need for affordable housing identified in the Updated Housing Needs for Rugby Borough September 2025. It is therefore not based on the evidence and is therefore not sound pursuant to Paragraph 36(b) in the NPPF.

We would also highlight the potential for non-delivery of affordable housing on committed sites, as a result of viability, such as the South West Rugby allocation, as set out below.

In respect of planning application R25/0491 on South West Ruby:

“Outline application for up to 1,600 residential dwellings; a 2 form entry Primary School; a 6 form entry Secondary School and Community Sports Hub including floodlit outdoor sports & changing/social/indoor fitness facilities; healthcare facilities; a mixed use centre containing residential dwellings, supported living facility, up to 11,200 sqm of community and commercial development which could include retail, office, food and

drink, nursery/creche, community/public hall and sui generis uses such as drinking establishments and take aways. Supporting development including open space, play areas, public realm, vehicle parking, cycle parking, a mobility hub, landscaping, drainage (all matters reserved except for access).

Full application for part of the Sustainable Transport Link between Homestead Link Road and land to the west; new estate road from the Community Spine Road to land to the north; associated landscaping and drainage. Demolition of parts of Cherry Tree Farm, Windmill Farm and Dunkleys Farm. Change of use of the retained buildings at Dunkleys Farm and Windmill Farm to commercial and community uses listed (included within the 11,200 sqm) as flexible uses under Class V of the GDPO."

The South West Rugby Masterplan SPD (Readopted 11 December 2024) confirms at paragraph 14.2 that Local Plan Policy H2 requires greenfield sites to provide 30% affordable housing. Despite this, The Updated Viability Assessment (October 2025) prepared for Homes England in respect of the application confirms at paragraph 8.1.7 of the report that:

"Even with no affordable housing, the scheme is still not considered viable."

Similarly, in respect of the planning application for Land off Cawston Lane, Rugby (R25/0487):

"Outline Planning Application. Residential development of up to 470 dwellings, associated vehicular access points to Cawston Lane, pedestrian/cycle access points, parking, landscaping, drainage features, open space, children's play area and associated infrastructure. Demolition of all existing buildings. (All matters reserved except for access)."

Paragraph 8.1.5 of the Financial Viability Assessment (June 2025) submitted with the application states:

"This shows that due to the burden of the overall cost so the scheme, even with 100% open market units the proposals are viability challenged."

The outline planning application (R25/0407) at Alwyn Road, Rugby for phased residential development of up to 800 homes (Use Class C3) as well as drainage, landscaping, open space, and associated infrastructure with all matters reserved is also accompanied by a Financial Viability Assessment (March 2025). At paragraph 8.1.3, this confirms that:

"Given that the RLV generates a deficit against the BLV under both scenarios, the scheme is not considered commercially viable in planning viability terms. Even with 0% affordable housing, the scheme is not viable against the BLV."

At a 30% requirement for affordable housing in accordance with the SPD, this would generate up to 861 affordable homes, which is a considerable amount towards the identified need.

We would also highlight the comments made in the Sustainability Appraisal (SA) further highlighting the issues with affordable housing delivery within the Borough. This states at paragraph 5.2.41:

“Specifically, there have been unforeseen delays to delivery that have impacted the Borough’s ability to maintain a five year housing land supply and the sites in question have all faced viability challenges such that ability to deliver affordable housing, alongside delivering on wider requirements, has been severely limited (e.g. Houlton is delivering zero affordable).”

With concerns over the ability for these sites to deliver any affordable housing, in addition to the concerns raised above, it is not considered that the Plan will be able to meet the need for affordable housing during the plan period. As such, we would suggest that additional sites should be identified to secure adequate delivery.

Minimum Housing Need Buffer

It is not considered that a 8.5% supply buffer would provide sufficient flexibility to continually demonstrate a five-year housing land supply if some sites do not come forward, particularly when taking into account unforeseen delivery issues from allocated sites (namely the increase in brownfield allocations) and noting that small site windfalls make up some 7.25% of the current housing provision. With the small site windfall allowance taken into account (which cannot be relied upon to the same extent as an allocated site) it is considered that a 15.8% buffer (8.5% over the 7.25% small site windfall allowance) would be more appropriate. This surplus would be more consistent with the 17% surplus in the adopted Local Plan 2011-2031 which the Inspector supported in Inspector’s Report – 27 March 2019 stating *“I consider the soundness of the Plan’s housing land supply in more detail under issue 6 below. However, in relation to the need for Lodge Farm, since the Housing Market Delivery Study was published, the housing land supply set out in the Plan has increased from 13,664 dwellings in the publication draft Plan to 15,369 homes at the point of submission. In the revised housing trajectory, the allocation at Lodge Farm is projected to deliver 665 dwellings within the Plan period, representing around 4% of the total housing supply in the Plan. Whilst I note the site promoter’s evidence that the Lodge Farm development could deliver more than this within the Plan period, without Lodge Farm the remaining housing land supply would still exceed the Plan’s housing requirement of 12,400 dwellings by more than **17%, which would be a comfortable surplus.**”* [emphasis added].

It should also be noted that even with a 17% buffer Rugby currently find themselves with a 5-year housing supply shortfall of 4.16 years as set out within the 5 Year Housing Land Supply Position Statement 2025-2030 only 6 years after adoption. A 5 Year

Housing Supply Position Assessment has been undertaken as part of Local Authority Reference R25/1041 which concludes that Rugby's shortfall is actually closer to 2.85 years against their local housing need, equating to a shortfall of 1435 dwellings. This 5 Year Housing Supply Position Assessment is submitted alongside these representations.

As set out within the Whole Plan Trajectory (Detailed) December 2025 the current housing provision and trajectory would only provide for a 5-year housing land supply up until 2034/35 (it may be even earlier as the local housing need figure will increase year on year as the base housing stock increases). From 2035/36 to the end of the plan period, Rugby would not be able to demonstrate a 5-year housing land supply. Taking into account the Plan-Making Policies contained within the Draft NPPF 2025 which would require the establishment of sub-regional Strategic Development Authorities, the adoption of a Spatial Development Strategy and then the adoption of a new Local Plan, it is not considered that Rugby (or the subsequent Unitary Authority) could adopt a new Local Plan to boost housing supply before 2036 at the earliest, indeed the Chief Officer for Growth and Investment noted at the Scrutiny Committee on 21 January 2025 it would be approximately a decade. As such, there is a considerable risk that Rugby could not demonstrate a 5-year housing land supply in the middle and end years of the plan period.

The Sustainability Appraisal December 2025 makes reference to the Draft NPPF 2025 at Paragraph 2.2.2 stating *"and a new draft NPPF is now anticipated in 2025"* however the implications of the Draft NPPF on the ability for a new Local Plan to boost housing supply during the plan period has not been taken into consideration when determining an appropriate supply buffer. The evidence base for underpinning the decision to use an 8.5% buffer is therefore considered to be incomplete.

A 15.8% buffer would generate a housing provision of 12,520 dwellings and could in turn provide a 5-year housing land supply for the entirety of the plan period to 2042 and would provide additional protection should Rugby's Housing Delivery Test results drop below 85% requiring the application of a 20% buffer. The Sustainability Appraisal December 2025 acknowledges at Footnote 14 that *"A strong focus on supply from existing committed sites and smaller greenfield sites suggests the need for a lower supply buffer (e.g. 5%), but the new focus on supply from urban allocations suggests the need for a larger buffer, e.g. 10%."* [Emphasis added].

It should also be noted that increasing the housing supply buffer would also help to address the unmet net need for affordable housing identified above.

Taking into account the above, it is not considered that the buffer is appropriate nor has it been justified given the anticipated time frames for a new Local Plan to boost housing supply in the middle of the plan period. Accordingly, Policy S2 is not considered to be sound pursuant to Paragraph 36(b) in the NPPF.

Small Windfall Sites

Windfall sites are defined in the NPPF as sites not specifically identified in the development plan which are taken into account to produce the housing trajectory. Paragraph 75 of the NPPF sets out that *“Where an allowance is to be made for windfall sites as part of anticipated supply, **there should be compelling evidence that they will provide a reliable source of supply.** Any allowance should be **realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.** Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”*

Policy S2 sets out a windfall expectation of 850 dwellings over the plan period equating to 50 dwellings per annum. The supporting text at Paragraph 1.23 states that *“Additional sources of supply will be windfalls on sites of fewer than 5 dwellings (50 homes per year), non-allocated sites within settlement boundaries, and new allocations made through neighbourhood plans. Appendix 1 is a housing trajectory for the plan period.”* It is not considered that compelling evidence has been provided to justify the number of small site windfalls in the housing provision over the plan period. As per Paragraph 75 in the NPPF the windfall allowance should have regard to:

1. the strategic housing land availability assessment
2. historic windfall delivery rates
3. expected future trends

Taking each of these in turn, the Housing and Economic Land Availability Assessment (HELAA) December 2025 makes no assessment of windfall sites. Paragraph 7.2 states that *“Windfall sites for 4 or fewer dwellings would generally be too small for inclusion within the HELAA. Therefore, no assessment of windfall has been undertaken as part of this report.”* The HELAA does include at Appendix 2 a list of 27 discounted small sites that it states: *“Where within settlement boundaries, these sites could potentially form windfall sites”*. However, no assessment of these sites has been made with respect to their availability, achievability and suitability. Indeed, it does not even confirm whether said sites are located within the proposed settlement boundaries or not. To this end the settlement boundaries as shown on the Policy Map have been drawn very tightly around the built extent of the settlements and therefore provide very little ‘white land’ where windfall sites could realistically come forward.

If the Draft Local Plan is going to rely partly on allocations made through neighbourhood plans for its housing provision, the Draft Local Plan should include an identified housing need for each settlement to ensure the subsequent neighbourhood plans can comply with Paragraph 30 in the NPPF which states that *“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. **Neighbourhood plans should not promote less development than set out in the***

strategic policies for the area, or undermine those strategic policies” [Emphasis added].

Turning to historic windfall delivery rates and expected future trends, the Small Site Windfall Allowance Report September 2025 sets out the ‘Number of Windfall Units Completed’. Whilst the 5-year average shows 51 dwellings per annum have been completed over the period 2020/21-2024/25 this is heavily skewed by the 2020/21 year (79 dwellings) and there has been a continued decline year on year with the 2024/25 year only providing 41 dwellings. The summary of findings states that “*While the 10-year average for small site windfall completions is 56, the average for the past 5 years is 51. It seems logical to round down to 50 rather than round up to 55 as the number for the past 4 financial years has been under 50 and, in general, the amount has trended downwards for the last 10 years.*” [Emphasis added]. Acknowledging a downward trend in completions it is considered that the small site windfalls should be reduced to 45 dwellings per annum (765 dwellings over the plan period) accounting for the last 4 years of completions being 49, 45, 41, 41 (an average of 44) rounded up to 45). The evidence base does not provide any evidence of expected future trends that would indicate windfall completions increasing.

It is not considered that the current projection of 850 dwellings via small site windfalls (fewer than 5 homes at 50 homes per year) at Policy S2 is based on proportionate evidence and is therefore not justified and not sound pursuant to Paragraph 36(b). Likewise given the reliance on windfall sites being allocated in Neighbourhood Plans and no identified housing needs, the Draft Plan is not considered to be in conformity with Paragraph 30 and is thus not sound pursuant to Paragraph 36(d).

Plan Period

Policy S2 establishes that the plan period is 2025-2042. This has been reduced from 2024-2045 in Policy S2 in the Regulation 18 Preferred Options Local Plan in order to reduce the number of dwellings that need to be planned for by the Local Plan. Paragraph 22 in the NPPF is clear that “*Strategic policies should look ahead over a minimum 15-year period from adoption*”.

Rugby’s current Local Development Scheme (LDS) sets out that Rugby expects to submit the Plan for examination in June 2026 with adoption scheduled for June 2027. Assuming strict accordance with this timetable the Plan would only look ahead for 14.5 years from adoption, taking into account the fact that local housing need is calculated for a full annum. Moreover, it is considered that the timetable itself is ambitious and could be subject to change. The LDS assumes that the Local Plan Examination and post-examination to adoption will only last 12 months. Government guidance contained in the ‘Local plans: taking part in examinations’ sets out that “*Most examinations take around a year to a year and a half, from start to end.*” not including the time after the examination process has closed for the Council to agree to adopt the Plan. It should also be emphasised that the Chief Officer for Growth and Investment noted at the

Scrutiny Committee on 21 January 2025 that the Inspectorate had written to the Council to express that a number of Local Planning Authorities are planning to submit Local Plans for examination before the December 2026 deadline which could result in capacity issues for examiners and delays to the examination process. The revocation of the postponement to Rugby's local elections in May could likewise delay the submission of the Draft Local Plan for examination.

The SA concludes at paragraph 7.2.4 that:

"The weak performance of the high growth scenarios also weakens the case for extending the plan period and supports the council's view that decisions about longer term strategy for the mid 2040s and beyond are better taken by the successor unitary authority in the context of a strategic development strategy, the new plan-making system and new national policy."

We disagree with this conclusion, being contrary to paragraph 22 of the NPPF, whereby deference to a future authority or as a result of a future possibility is not recognised as an exception to this requirement. The Plan is therefore not sound pursuant to Paragraph 36(d).

Whole Plan Trajectory

We have concerns as to the over-reliance on existing allocations to deliver a large proportion of the housing need over the Plan period, including affordable housing need, as set out in our comments on Policy S2. For example, the South West Rugby allocation is expected to contribute 3,505 of the homes within the supply (30%). The Whole Plan Trajectory states that these sites will start to deliver in years 2028/29 onwards.

All of the sites at South West Rugby noted in the Whole Housing Trajectory awaiting determination are outline applications. This includes R22/0853, R25/0487, R25/0407 and R25/0491, in total, expected to deliver as early as 2028/29 (with the exception of Homes England's application R25/0491 which is anticipated to commence delivery in 2031/32).

It is considered unrealistic that sites which have not yet received outline planning permission could be expected to deliver this timeframe, when factoring in the time to agree the s106 agreements, prepare and submit reserved matters applications and discharge all pre-commencement conditions. It is also noted that Cawston Farm 1 (Ref R22/0853) was submitted in August 2022, and remains undetermined over three and a half years after submission.

As set out in our comments in relation to affordable housing provision, three of the aforementioned sites have also submitted viability assessments, which is likely to delay determination further.

We would reiterate the issues identified with deliverability and viability in paragraph 5.2.41 of the SA, as referenced above, which notes unforeseen delays to delivery.

As such, it is considered that the Whole Plan Trajectory is unrealistic, and as does not provide sufficient flexibility should these complicated allocations not deliver as predicted. In its current form, the Plan is not considered sound in accordance with paragraphs 36(a) and (c) of the NPPF.

(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.

Policy S2 Strategy for Homes should be modified to uplift the future need for housing to ensure the plan can deliver 205 affordable homes per annum. In order to meet the shortfall of affordable homes over the plan period, which could be even greater in consideration of the viability concerns at South West Rugby and Houlton, the housing provision should be revisited and additional sites allocated through Policy S6.

Policy S2 Strategy for Homes should be modified to include a larger housing buffer to take into account unforeseen delivery issues on brownfield site allocations, deliverability of windfall sites and the risk posed by the anticipated time frames for a new Local Plan to boost housing supply in the middle of the Plan period. The supply buffer should be increased to at least 10% (the above example is 15.8%). Additional sites should be allocated at Policy S6 which would deliver homes from 2035 onwards.

Paragraph 1.22 should be modified to read as follows “Supply is allocated for [+10%] more than the minimum requirement as a buffer to increase the likelihood of the council being able to continually demonstrate a five-year housing land supply [over the plan period].”

The small site windfalls at Policy S2(B) should be reduced from 840 to 765 with Paragraph 1.23 modified to read as follows “*Additional sources of supply will be windfalls on sites of fewer than 5 dwellings ([45] homes per year), non-allocated sites within settlement boundaries, and new allocations made through neighbourhood plans. Appendix 1 is a housing trajectory for the plan period.*” The reduced 75 dwellings should then be re-allocated under Policy S6 (Policy S6 to be modified as required).

An additional strategic policy should be added to ensure suitable homes are allocated within Neighbourhood Plans (where Neighbourhood Plan Areas have been designated) to ensure the windfall allowance is robust. In the absence of Neighbourhood Plans

coming forward the Local Plan should be modified to ensure these homes could come forward in a subsequent Development Plan Document. This could read for example as below (using the West Northants Regulation 18 Draft Plan as an example):

“Housing sites will be identified to provide for the parish housing requirements set out below. Suitable sites, within or immediately adjoining the confines of the villages referenced, will be identified either through neighbourhood development plans or through a development plan document.

If draft neighbourhood development plans making provision for at least the minimum housing numbers of the relevant area have not made demonstrable progress within two years of the adoption of the Plan the Council will allocate sites for development within a development plan document in order to meet the requirements of this Local Plan. Progress thereafter will be reviewed on an annual basis.

Minimum Housing Figure by Parish

[Provide list of Parish', settlements and identified housing figures]”

The Plan period should be extended from 2025-2042 to 2043/44 at the earliest, to ensure that the Plan provides for a minimum of 15 years on adoption. This would necessitate allocating additional sites under Policy S6 to ensure the Local Plan provides for the minimum local housing need over the extended Plan period.

The above changes would ensure that the Plan is sound pursuant to Paragraphs 36(b) and (d) in the NPPF.

In order to provide sufficient flexibility within the housing trajectory and ensure housing need is met in full, additional site allocations with Policy S6 should be identified which can deliver housing within the short and medium plan period, in the event of changes to the trajectory. This would ensure the Plan is sound pursuant to Paragraphs 36(a) and (c) of the NPPF.

(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:

To set out the requirements for modifications detailed above to address soundness issues.

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

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

AI has not been used for any purpose in respect of these representations.

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

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

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

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

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

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 Residential Allocations	Policies Map	X
Site ID					

4. Do you consider the Local Plan:

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

Spatial Strategy

We broadly support the location of the majority of growth to the most sustainable settlements within the District as set out in the Settlement Hierarchy (Policy S1), with the exception of the site allocations detailed in our comments to this Policy.

We raised concerns regarding the proposed shorter Plan period, inadequate housing need buffer, windfall over-reliance, unrealistic housing trajectory and higher affordable housing need in our comments on Policy S2. In addition to this, and as set out in our comments on Policy S6 below, we are concerned with the suitability of a number of site allocations.

In combination, we consider the effect of the above issues results in a need for additional sites for housing to be identified within the Plan, to ensure its soundness. Paragraph 5.2.39 of the SA sets out a summary of the reasons considered to support a concise discussion on the appropriate strategy. These include that a modest amount of residual homes need to be provided for, less than in the draft Regulation 18 Plan, with limited arguments for a

housing requirement set above LHN, as well as a significant boost in supply from urban allocations.

Paragraph 5.2.41 confirms that:

“It is important to recall that the overall land supply for the plan period is dominated by commitments (7,993 homes) and that the committed supply involves a major focus on supply from strategic urban extensions to Rugby.”

We provided concerns with over-reliance on existing commitments in our comments on Policy S2 and would reiterate the viability concerns raised and the resulting effect on affordable housing supply.

The SA considers the possibility of one or more strategic allocations as part of the strategy. Paragraph 5.2.42 states:

“With regards to the possibility of one or more new strategic allocations (e.g. sites delivering several hundred homes or more), it is important to be clear that there are a wide range of theoretical arguments to be made in support of such sites, such that the aim of the discussion here is not to rule out the possibility of one or more allocations. Rather, the aim is to highlight that the high level case for supporting one or more such sites through the Rugby Local Plan is not as strong as is often seen elsewhere.”

We consider that the appropriate strategy is to deliver a new strategic site which could comfortably cover the shortfall in housing as identified above, as well as additional infrastructure benefits. We note that the SA acknowledges the need to consider higher growth involving allocation of one or more omission sites at paragraph 5.4.16, however, we disagree with the conclusions at paragraph 5.4.22 in relation to the two omission strategic sites assessed, NW Rugby SUE (Site 114) and Lodge Farm (Site 73), which states:

“The omission sites discussed above are those that are best performing such that there is limited pressure to consider further omission sites, given that the proposed submission allocations are all quite strongly supported and given the number of homes needed from allocations at Rugby under a reasonable high growth scenario.”

The SA itself in numerous places demonstrates the unsuitability of both sites. For example, the Strategic Transport Assessment, having been completed to model the impacts of growth scenarios, concludes that transport is a major issue in relation to Lodge Farm at paragraph 5.2.26 of the SA, *“in that there would be a need to deliver major transport upgrades and the achievability, suitability and viability of the necessary upgrades is highly questionable (see further discussion below).”*

In relation to NW Rugby, the same paragraph concludes that: *“whilst it performs better in accessibility and transport terms, and a package of necessary transport upgrade interventions has been identified that is likely achievable; however, the cost of delivering the necessary upgrades would again lead to viability challenges.”*

Further, the SA sets out the conclusions from the Whole Plan Viability Assessment at paragraph 5.2.58, which in respect of Lodge Farm that:

*"The viability of this strategic infrastructure package is modelled in the Viability Assessment, and this shows that **Lodge Farm is a long way from being a viable proposition even at 0% affordable housing**. It would be necessary to significantly increase the number of dwellings and/or significantly cut the infrastructure which is needed to make the new village sustainable and mitigate its impacts."* [Our emphasis].

For NW Rugby it concludes that *"The combined infrastructure bill means that the scheme could likely deliver 20% affordable housing, which is below the 30% current policy requirement and well below the new proposed 40% 'golden rule' for sites released from the Green Belt."*

Paragraph 5.4.100 of the SA references the Inspector of the adopted Plan's comments in respect of Lodge Farm, formerly proposed for allocation, and confirms: *"The Inspector's Report also says much more besides, and the great majority of the concerns raised remain entirely applicable at the current time."* [Our emphasis]

In relation to NW Rugby, paragraph 5.4.21 of the SA states:

"There is now considered to be a reduced case for allocation, in that: A) there is less case for allocation in quantitative terms, as discussed in Section 5.2; B) new evidence finds that the site mostly does not comprise grey belt; C) new evidence confirms the viability challenges that were previously suspected; and D) there is now no longer a need for a new secondary school in the north of Rugby, which was previously a key factor in support of exploring the option of allocation in detail." [Our emphasis].

The Growth Scenarios Appraisal at Chapter 6 of the SA considers eight different growth scenarios, one of which (Scenario 8) includes Lodge Farm. This scenario scores worst overall, particularly with regards to accessibility and transport, indicating a significant negative effect if brought forward.

In response to this, paragraph 6.2.15 of the SA states:

"In conclusion, whilst there is a case for flagging a concern with Lodge Farm, it is noted that the Environment Agency did not raise any concerns through the Draft Plan consultation (when Lodge Farm was an omission site but featured in the RA growth scenarios), hence the scenarios are now judged to perform on a par. With regards to significant effects, there is a need to also factor-in sites that are a constant across the growth scenarios, but overall, there are limited concerns (as discussed below, in Section 9) such that neutral effects are predicted across the scenarios."

We struggle to understand how all of the growth scenarios which include NW Rugby (Scenarios 3, 4, 6 and 7) are assessed as having a 'moderate or uncertain positive effect' given the highways, ecological and heritage constraints identified in the Stage 2 HELAA.

As a result of the above commentary in relation to the suitability of both Lodge Farm and/or NW Rugby as suitable reasonable alternatives for allocation, we find it inconceivable that the SA could conclude in paragraph 5.4.105 that:

“On balance it is still considered reasonable to progress Lodge Farm to the RA growth scenarios, as per the approach at the Draft Plan stage, but the case for doing so has undoubtedly reduced considerably.”

Further, that *“there is little or no strategic case to be made for proactively exploring new settlement options over-and-above what has been promoted to the Council.”* [Paragraph 5.4.108 of the SA].

The Land south of M45, Dunchurch (Site 22) has been promoted by Sworders on behalf of the landowners throughout the Local Plan process. It represents a suitable alternative to both Lodge Farm and NW Rugby SUE. It is outside of the Green Belt, and whilst would be a standalone settlement, its proximity to Dunchurch could offer synergic benefits, being located within a short walking and cycling distance of Dunchurch. Paragraph 5.4.8 of the SA recognises Dunchurch as a highly sustainable location, having *‘comfortably the overall best score’* in respect of access to services, public transport and internet in the Rural Sustainability Study. This is in contrast to Lodge Farm which is recognised as being remote.

Further, and as appended to this response, a Transport Feasibility Study has been undertaken in respect of Site 22 by Paul Basham Associates, which also confirms the accessibility of the location, and, that safe and suitable access can be achieved into the site.

Paragraph 5.4.107 states:

“A consultation response was received from the promoters of Site 22 suggesting that the site performs better than Lodge Farm as a new settlement option, but there was limited supporting evidence. Whilst Site 22 is closer to the Dunchurch and Rugby relative to Lodge Farm, it is equally closer to the South West Rugby committed growth area. Also, a key consideration is that evidence shows Site 22 and Site 91 to be the most constrained growth options in the Borough in landscape terms (Figure 5.5, above).”

In response to this we would reiterate that our comments on the site performing better than Lodge Farm were based entirely on the conclusions of the Stage 2 HELAA. This clearly shows that Site 22 performs better against each criteria than Lodge Farm, therefore we disagree that there is limited supporting evidence for this. A direct comparison of all three sites against the Stage 2 HELAA criteria demonstrates this. Further, in relation to landscape, whilst we acknowledge that further landscape assessment is required to demonstrate how the site could be delivered with minimal landscape impacts, we would highlight that the Addendum for Strategic Site Options: Post-mitigation assessments (December 2025) identify Lodge Farm as having a medium landscape sensitivity, concluding:

“However, even where green infrastructure is effectively integrated, including around the site edges, residential development at this location is still expected to alter the largely

undeveloped skyline and extensive views afforded from public footpaths within and in proximity to site, including the Oxford Canal Walk."

It is noted that this assessment was informed by a landscape note, and a Vision Document including a site masterplan.

Site 22 is assessed within the Landscape Sensitivity Assessment of Strategic Site Options (March 2025) and is concluded to have a high/medium overall landscape sensitivity. This is despite the conclusions stating that:

"Views into the site from the surrounding transport infrastructure are predominantly obscured by hedgerows with trees."

This assessment does not consider any form of mitigation which could address the landscape concerns, unlike the Addendum for Strategic Site Options: Post-mitigation assessments which was specifically undertaken to account for such evidence. Site 22 was not included in this assessment and has not been assessed in anywhere near as much detail as Site 73 to support the conclusion that Site 22 is constrained in landscape terms.

We note the reference to the provision of a secondary school no longer being required in paragraph 5.4.21 above, and confirmation in paragraph 5.2.47 that:

"The most appropriate mitigation for this level of shortfall of places is likely to be expansion of existing schools, and the County Council has indicated that there is potential for up to three school expansions."

We would highlight that, should a greater number of homes need to be planned for within the Plan, as is our view, resulting in the requirement for a secondary school, the land south of M45, Dunchurch (Site 22) could accommodate this.

In summary, we do not consider that the continued consideration of both Lodge Farm (Site 73) and NW Rugby SUE (Site 114) as reasonable alternatives is justified, with the contradicting statements in the SA which demonstrate the unsuitability and lack of viability of both sites. It is our view that, to be found sound, additional sites should be identified to ensure the housing need is met in full across a minimum 15-year Plan period. As such, we would suggest that Site 22 represents a suitable alternative, as demonstrated within the Council's assessment of the Site in the HELAA. The SA does not demonstrate that either Lodge Farm or NW Rugby SUE represent suitable sites for allocation.

Green Belt Release

The Draft Local Plan proposes releasing a significant amount of land from the Green Belt for both residential and employment development. Residential allocations requiring Green Belt release at Wolvey, Brinklow, Long Lawford, Stretton-on-Dunsmore, Brandon and Wolston make up 1,476 or 51% of all new residential allocations at Policy S6 (a marginal decrease when compared to the 52% in the Regulation Preferred Options).

The evidence for the Plan includes a Green Belt Review in two parts, Green Belt Contribution Study Strategic Assessment (Stage 1) and Green Belt Contribution Study Stage 2: Site Contribution Assessments. Stage 1 identifies the areas that are suitable for definition as Grey Belt and Stage 2 provides an assessment of those sites which are not identified at Stage 1. The Stage 2 assessment states that *"In March 2025 RBC carried out a Preferred Options Consultation [see reference 2]. This proposed 12 residential allocations within the Green Belt, three employment allocations and four Gypsy and Traveller site allocations. Of these, 10 residential sites, one employment site and two Gypsy and Traveller sites lie within areas identified at Stage 1 as grey belt.... RBC requested LUC to assess the contribution of the remaining preferred option sites – that is, those located in areas not identified as grey belt at Stage 1 – together with three substantial omission sites (that is, sites which are not preferred options)."* As such all of the residential site allocations with the exception of Sites 253 and 316 in Long Lawford have been identified as Grey Belt. We agree that residential allocations within the Green Belt (excluding Sites 253 and 316) meet the NPPF definition of Grey Belt.

Turning to Site 253 (Lawford Fields Farm), it is identified as having a strong contribution to both purposes A and C as set in Paragraph 143 of the NPPF. Indeed, the Stage 2 assessment recognises that *"There are limited mitigation measures which would be able to limit impacts on contribution to Purpose A"*. Whilst Long Lawford is not identified as a town and thus provides a weak/no contribution to purpose B it should be noted that it would result in the merging of Rugby and Long Lawford and as such would result in an incongruous expansion of Rugby. This is noted within the Stage 2 assessment which states that *"Development of land in the parcel would **have an incongruous impact on the urban pattern. The lack of features to restrict and contain development mean that development here would have an incongruous impact, and would contribute to sprawl associated with the large builtup area of Rugby. The parcel forms half of a fragile gap between Rugby and Long Lawford, and any development would weaken the gap, and be incongruous with the urban pattern.**"* [Emphasis added]. Whilst a small area of Green Belt is retained between Rugby and Long Lawford this is proposed to provide public recreational use. The development requirements specify that this could be *"for example sport pitches with a community use agreement, allotments or other public open space"*.

It should be noted that some outdoor sport and recreational buildings which include the provision of buildings and hardstanding could compromise previously developed land and could in turn result in this area meeting the NPPF definition of Green Belt. It is considered that that the merging of Rugby and Long Lawford would in turn cause a fundamental weakening of the wider Green Belt. It is thus not considered that this alteration to the Green Belt has been fully evidenced or justified in accordance with Paragraph 145 in the NPPF and is therefore not sound pursuant to Paragraphs 36(b) and (d) in the NPPF.

Suitability of Site Allocations

Brinklow (Site ID: 315 and 337)

We do not support the allocations at West Farm and Home Farm (Site ID: 337) and Land south of Rugby Road (Site ID: 315). Both sites would have a significant impact on the designated heritage assets within Brinklow which includes the Brinklow Conservation Area (and the number of constituent listed buildings within), Brinklow Castle (Motte and bailey castle Scheduled Ancient Monument) and potential archaeological remains that can be identified on the Historic Environment Record (HER). The Heritage Statement states with respect to Site ID's 315 and 337 respectively that *"Potential impacts include the **loss of views across the rural landscape, the demolition of historic buildings on Rugby Road to facilitate site access, and the destruction of the ridge and furrow earthworks.** All would have the potential to **harm the character of the conservation area, and the setting of some of its constituent heritage assets, including Brinklow Castle.**"* and *"Key concerns include: the potential **loss of historic agricultural buildings; erosion of the farmsteads' setting, and Brinklow Castle's historic landscape setting; and loss of archaeological earthworks.**"* [Emphasis added]

It is considered that an Archaeological Desk-Based Assessment and Geophysical Surveys should be undertaken (if they have not already) and be made available to Policy Officers (and the public) to confirm the extent of potential archaeological remains on these sites before they are allocated.

In order to deliver ~75 dwellings in the developable site area identified for Site ID: 337 the indicative density would need to be over 30 dwellings per hectare. This is considered to overly dense given the site's edge of settlement and highly sensitive heritage setting location.

The allocations at West Farm and Home Farm (Site ID: 337) and Land south of Rugby Road (Site ID: 315) would fail to conserve and enhance the historic environment and are therefore not compatible with Chapter 16 in the NNPF and are in turn not considered to be sound pursuant to Paragraph 36(d).

Newton (Site ID: 87)

Newton is the only 'Other rural settlement' in the Settlement Hierarchy at Policy S1 to receive a residential allocation (whilst Brandon is an Other rural settlement the site allocation adjoins Binley Woods which is a Main Rural Settlement). As an Other rural settlement Newton scores poorly for sustainability in the Rural Sustainability Study Report December 2024 with no leisure centre, bank, café, dentist, early years nursery or garage. It likewise has poor access to public transport infrastructure with no railway station and a poor bus service. Clearly future occupants would be reliant on the private car to access shops, services and employment opportunities with the Rugby urban area.

The development requirements set out that that the scheme would need to “*Upgrade walking and cycling links (footpath to the north and bridleway to the south) to Great Central Walk/LCWIP Route 46 (Great Central Walk between Crowthornes and Newton) **which connects to schools, local amenities and employment sites in Coton Park.***” [Emphasis added]. The expectation then is that children would walk via the Great Central Walk, PRoW network and Coton Park East in order to access Rugby Free Primary School. When taken in conjunction with the indicative concept plans provided for Coton Park East, this would necessitate children, who may be unaccompanied, walking along a combination of unlit footpaths with no natural surveillance and an industrial estate. This would not encourage active travel and potentially puts unaccompanied children in areas that could attract criminal and anti-social behaviour. This would not be in accordance with Paragraph 96 which states that “**Planning policies and decisions should aim to achieve healthy, inclusive and safe places** which:

a) *promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*

b) *are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and*

c) *enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that **encourage walking and cycling.***” [Emphasis added]

This would likewise not be in accordance with Paragraph 135(f) which states that “**Planning policies and decisions should ensure that developments:**

f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁵¹; and **where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.***” [Emphasis added]

It is far more likely in practice that parents would then have to drive children to school putting additional pressure on Newton Manor Lane and the A426 at peak times.

Newton and Biggin had a Neighbourhood Area designated on 20 September 2023. Given the size of the settlement, it is considered that residential development should come forward via a Neighbourhood Plan whereby local residents would have the opportunity to have a Referendum on said development. Alternatively, residential development could be delivered on this site by way of small site windfall.

Taking into account the above Site ID: 87 is not considered to be sustainable and suitable for development. The allocation of Site ID: 87 is considered to be contrary to Paragraphs 96 and 135 and therefore not considered to be sound pursuant to Paragraph 36(d) in the NPPF.

Wolvey (Site ID: 358 and 309)

Whilst the reduction in allocations at Wolvey and Wolvey Heath from the Regulation 18 Preferred Options Local Plan are supported, the proposed allocations at Wolvey would still see the total number of dwellings within Wolvey increase from 275 to 485 (a 176% increase) which would still have a significant impact on the settlements character and townscape in addition to its residents.

As detailed within the Rural Sustainability Study December 2024 Wolvey has limited access to shops and services (including no pharmacy, leisure centre, bank, dentist or garage). Wolvey also has poor access to public transport infrastructure with no railway station and a poor bus service when compared to other main rural settlements. Wolvey also scores poorly for internet access being outperformed in this respect by a number of other rural settlements.

There is no secondary school within Wolvey, (the nearest being in Hinckley and therefore outside of Warwickshire County Council's local education system). With respect to the Wolvey CofE Primary School, the Education Topic Paper states that *"Wolvey School is unlikely to be over-capacity based on planned housing growth, because a worst case scenario is presented and not all children who live in new homes built in Wolvey are likely to attend this school"*. Whilst not all of the children would attend Wolvey CofE Primary School nearly all of the remaining children would attend The Revel. Whilst The Revel is not forecast to have the same shortfall as Wolvey CofE Primary School it is still the case that The Revel is forecast to have a shortfall for Years R-6 within the plan period. It is not clear from the Education Topic Paper what the in-combination demand across both the Wolvey CofE Primary School and The Revel would actually be taken into account the split across both schools. What is however the case is that when taking a worst case scenario (which should be the basis for determining school capacity), both Wolvey CofE Primary School and The Revel would have shortfalls within the plan period.

It was noted by Warwickshire County Council in their response to the Regulation 18 Preferred Options consultation that *"Feedback from Commissioners across Children's and Adult Social Care Services, Social Work teams, and colleagues in the Integrated Care Board, is that the proposed dispersal strategy may add further burdens in areas with already existing challenges. **The proposals for example in Wolvey, factoring that policy H7, could lead a requirement to develop 175 social rent homes in that area. It is likely that some of the 175 residents will be accessing social care services or early help prevention. However, there is limited care infrastructure within that area and due to the rural nature of the location, it is anticipated that there could be service viability issues. The local GP practice for example, is a branch of a service provided from Hinckley and outside our local care system.**"* Whilst the number of dwellings has decreased since Regulation 18, as sites 358

and 309 would require release from the Green Belt they would be subject to 40% affordable housing provision with 70% of those being socially rented. As such this could still generate ~59 socially rented homes and thus would still place pressure on social care services.

Taking the above into account, Wolvey is not a sustainable settlement for development and future occupants would likely be reliant on the private car to access shops, services and employment opportunities. As such it is not considered that this allocation has been justified by the evidence base and is in turn not sound pursuant to Paragraph 36(b).

Land east of Fosse Way opposite Knob Hill, Stretton-on-Dunsmore (Site ID: 6)

We raised concerns as to the suitability of this site in our Regulation 18 response. Whilst it is located adjacent to the settlement of Stretton-on-Dunsmore, identified as a Main Rural Settlement in Policy S1, the site itself is not well located with regard to the settlement and the facilities therein.

It is located on the outskirts of the settlement, with no connecting footway to provide safe pedestrian access to the facilities, including the doctors surgery and the school. It is positioned directly opposite the junction of the B4455 Fosse Way with Knob Hill. In addition, there is a further junction of the B4455 Fosse Way with Frankton Lane within close proximity to the south, which presents a hazardous situation for pedestrians/cyclists from the site, and raises the question as to how safe and suitable access could be delivered from this site given the proximity of existing junctions and the lack of footways. Pedestrians (including children) would have to travel c.150m northwards on Fosse Way to reach the nearest footpath, and cross the junction with Knob Hill with very poor visibility to oncoming traffic from Knob Hill to the west due to the angle of the junction.

We also note that part of the site falls within Flood Zone 2/3, therefore would question its suitability for allocation within the Plan.

(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 number of residential allocations at Policy S6 requiring Green Belt release should be reduced to ensure that the Plan is sound pursuant to Paragraphs 36(b) and (d).

Site ID 253 (Lawford Fields Farm) should be removed as an allocation from Policy S6 and retained as Green Belt to prevent a fundamental weakening of the Green Belt by virtue of the merging of Rugby and Long Lawford. This would ensure that the plan is sound pursuant to Paragraphs 36(b) and (d).

The residential allocations at West Farm and Home Farm (Site ID: 337) and Land south of Rugby Road (Site ID: 315) should be removed from Policy S6 to preserve the setting of designated heritage assets. This would ensure that the plan is sound pursuant to Paragraph 36(d).

The residential allocation at Newton (Site ID: 87) should be removed from Policy S6 and a housing requirement provided for Newton so that this site could be delivered as part of a new/updated Newton and Biggin Neighbourhood Plan. This would ensure that the plan is sound pursuant to Paragraph 36(d).

The residential allocations at Wolvey (Site ID: 358 and 309) should be removed from Policy S6. This would ensure that the plan is sound pursuant to Paragraph 36(b).

The residential allocation at Stretton-on-Dunsmore (Site ID: 6) should be removed from Policy S6. This would ensure that the plan is sound pursuant to Paragraph 36(b).

In order to account for the removal of the above sites from Policy S6 alternative sites will need to be allocated for residential development. We consider that the required level of housing could be accommodated on Site 22 – Land South of M45, Dunchurch, being a sustainable location outside of the Green Belt which could, if required, also deliver a secondary school.

(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:

To set out the requirements for modifications detailed above to address soundness issues.

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

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

AI has not been used for any purpose in respect of these representations.

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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Land South of M45 Dunchurch, Rugby

Transport Feasibility Study

February 2026



 Transport Planning

 Travel Planning

 Civil & Structural Engineering

RESIDENTIAL DEVELOPMENT
LAND SOUTH OF M45 DUNCHURCH
RUGBY

TRANSPORT FEASIBILITY STUDY

CONTROLLED DOCUMENT

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RESIDENTIAL DEVELOPMENT LAND SOUTH OF M45 DUNCHURCH RUGBY

TRANSPORT FEASIBILITY STUDY

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1. INTRODUCTION

- 1.1 This Transport Feasibility Study (TFS) has been prepared by Paul Basham Associates to assess the potential for a residential development comprising circa. 1,500 dwellings at Land South of M45 Dunchurch, Rugby. The site location and red line boundary is demonstrated in Figure 1.



Figure 1: Site Location

- 1.2 As part of the following assessment and to inform future works, Paul Basham Associates undertook a site visit in February 2026 to assess the existing conditions of the site and surrounding road network.

Planning History & Context

- 1.3 There is no recent planning history at the proposed development site. There is a local plan allocation north of the site as part of the Rugby Borough Council Local Plan 2011 – 2031 for a new neighbourhood of around 5,000 dwellings and 35Ha of B8 employment land. The site lies to the north west of Dunchurch and south west of Rugby and plans for a new spine road referenced as the Homestead Link Road have been provided. This would connect Coventry Road west of Dunchurch and potential new roundabout junction at Rugby Road.
- 1.4 In closer proximity to the site, an application was approved in 2016 for an *'Outline planning application for the development of the site for up to 86 dwellings (Use Class C3) and associated works including means of access from the A45/M45 roundabout and an emergency access from Daventry Road. All other matters are reserved.'* The site is located north of the site, accessed via the Daventry Road roundabout and has recently been built out.
- 1.5 This report provides an assessment of the potential opportunities and constraints for delivering a new residential development within this location. Specifically, this report will review the accessibility credentials, potential access arrangement options, capacity of the local and strategic road network surrounding the site. Through this report the suitability of the proposed site for allocation within the Rugby Borough Council Emerging Local Plan from a transport perspective will be assessed.

2. EXISTING SITE CONDITIONS AND ACCESSIBILITY

- 2.1 The site is situated to the south of the M45, Dunchurch and is currently occupied by agricultural land. The site benefits from two existing accesses along Toft Hill and an access along Daventry Road within the northeastern corner of the site. There is also a separate access from Daventry Road which provides access to two private residential dwellings and outbuildings associated with Laurel Farm. These dwellings and outbuildings are outside of the site boundary as shown in Figure 1.

Local Road Network

A45 / Daventry Road

- 2.2 The A45 borders the eastern side of the site with a north-south alignment, providing access into Dunchurch (north) and Daventry (south). The A45 provides access to the M45 westbound via a slip-road which borders the site to the north. Vehicles travelling eastbound on the M45 can join via the slip before making a U-turn at the Thurlaston Interchange roundabout.
- 2.3 The A45 is a dual carriageway for approximately 850m from the roundabout with Daventry Road to approximately 100m south of the access to the private dwellings. The carriageway varies in width from 6.5m each side of the carriageway (at the point of being a dual carriageway) with 3.25m lane width. Upon becoming a single carriageway, the road measures approximately 8m wide with 4m lane width. The A45 is subject to a 50mph speed limit along the site frontage. The existing conditions along the A45 are presented in Photographs 1 and 2.



Photograph 1: A45 facing north



Photograph 2: A45 facing south

A426 / Toft Hill

- 2.4 Toft Hill is a single carriageway road with a north-south alignment providing access into Dunchurch to the north (approximately 900m north of the site) and towards Southam to the south (approximately 12km south of the site). Toft Hill borders the western side of the site and measures approximately 7m

in width and is subject to a 50mph speed limit along the site frontage and reduces to a 30mph speed limit approximately 250m north of the site, upon entrance to the village of Dunchurch.

M45

- 2.5 The M45 forms part of the Strategic Road Network (SRN) and runs east-west, bordering the northern boundary of the site. The M45 provides connections to Watford and the M1 to the east and connects to the A45 to the west which provides connections to Coventry and Birmingham. The M45 is subject to national speed limit for motorways (70mph), with each side of the carriageway measuring approximately 7.3m in width.

Pedestrian and Cycle Network

Toft Hill

- 2.6 There are good pedestrian connections surrounding the site. Footways are present along the western side of the carriageway along Toft Hill measuring approximately 1m wide directly adjacent to the site and extend to approximately 2m wide upon entrance to the village of Dunchurch. The footways adjacent to the site are impacted by overgrown vegetation. There is opportunity to improve the footway to measure 2m wide with a pedestrian crossing from the site (eastern side of the carriageway), which will be discussed in more detail later in this report.

A45

- 2.7 There are footways present along the western side of the A45 which measure approximately 1m wide which are impacted by the verge and overgrown vegetation (as shown in **Photograph 3**). There is opportunity for footways to be upgraded to measure 2m along the A45 to facilitate safe pedestrian movement.



Photograph 3: Existing footway along A45

Public Rights of Way

- 2.8 There are several Public Rights of Way (PROWs) surrounding and within the proposed development site as shown in **Figure 2** which will be critical in supporting safe and convenient access between the site and Dunchurch.

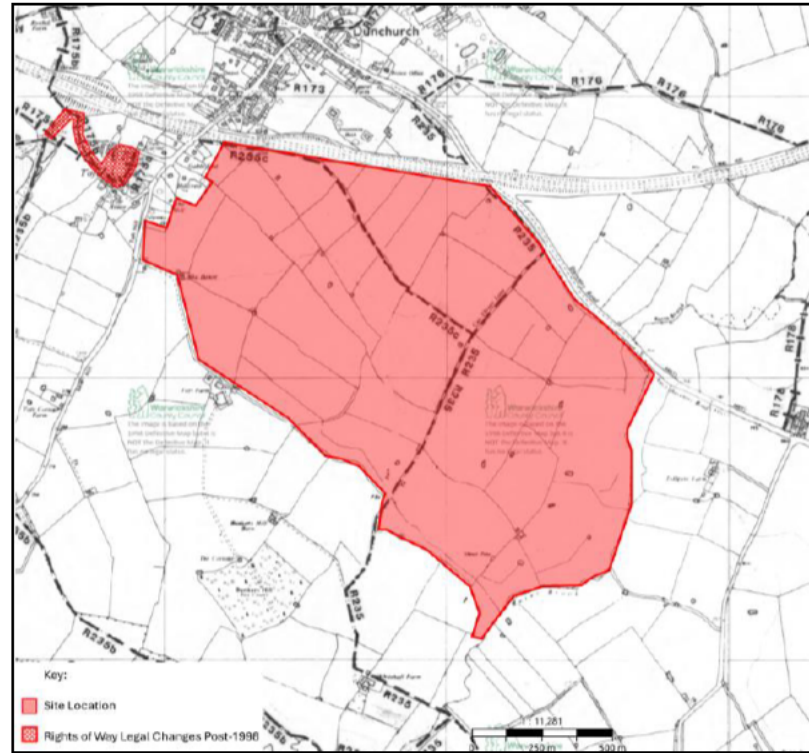


Figure 2: Public Rights of Way Map (Source: Warwickshire County Council)

- 2.9 Public footpath R235 runs through the site and adjacent to the A45 connecting site users to pedestrian infrastructure within Dunchurch, while R235c connects to the northwestern site boundary at Southam Road. Within the site area the R235 PROW is informal and navigates rural land, however a 325m portion of the route operates adjacent the A47 where a narrow footpath of approximately 1m widths is provided. As a result, the site location is well connected via public rights of way to Dunchurch. The PROW route therefore facilitates a continuous link for pedestrians from the site into the village centre from both the southeast and west directions. The existing conditions of footpath R235 are demonstrated in **Photographs 4 and 5**.
- 2.10 While there are enhancement connections identified within the Warwickshire Local Cycling and Walking Infrastructure Plan (LCWIP) that the site location would benefit from, none of these are directly connected to the site location but are based within Dunchurch, notably R62, R32, and R25 (LCWIP Figure R12).



Photograph 4: Footpath R235



Photograph 5: Footpath R235 within the site boundary

Cycle Infrastructure

- 2.11 There are National Cycle Routes (NCR) within vicinity of the site as shown in **Figure 3**. This includes NCR 41 which can be accessed into Rugby and Leamington Spa. In addition, the carriageways along the A45 are wide and have a relatively shallow gradient which will facilitate safe cycle movement.

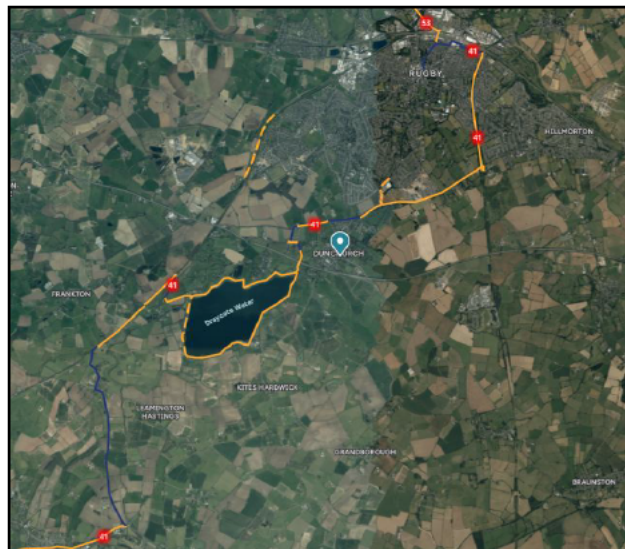


Figure 3: Cycle Network Map

Public Transport Provision

Bus Services

- 2.12 The nearest bus stops to the site are 'Dunchurch Hall' (approximately 800m from the site) and 'War Memorial' (approximately 1.1km from the site). The Dunchurch Hall stops benefit from a flagpole and printed timetables and is served by the 63-bus service to Rugby and Leamington Spa. The 63 service is

operated by Stagecoach is frequent with hourly services Monday – Saturday and 5 services running on a Sunday.

- 2.13 The War Memorial stops benefit from a flagpole, printed timetables and a bus layby and is utilised by the community bus service, the 203, which runs to Rugby once per week.
- 2.14 It is anticipated that the proposed development could provide contributions towards the improvement of existing bus infrastructure and services. There is opportunity improve the bus stops to include for a sheltered area and enhance the bus services to also stop internally within the site to facilitate the use of public transport for site users and the community. It is anticipated that this will be discussed further with local operators and the highway authority as part of future engagement and promotion.

Railway Services

- 2.15 The nearest railway station is located in Rugby, approximately 14km north of the site and can be accessed via a 31-minute cycle or 44-minute bus journey. Rugby station benefits from toilets, step free access, waiting areas, shops, ticket machines, 723 car parking spaces and cycle storage. The station offers direct services to Birmingham New Street, London Euston, Crewe and Stockport.

Local Amenities

- 2.16 The site is located within walking distance of the village centre of Dunchurch (approximately 950m) and can be reached via a 15-minute walk or 5-minute cycle, facilitated by good pedestrian and cycle links. The village offers key amenities including pubs, pharmacies, places of worship, bus stops, convenience stores and a primary school.

Collision Data

- 2.17 Collision data has been obtained from the Mapping Application for Visualising Road Incident Casualties (MAVRIC) for the latest 5-year period available (2020 – 2024). The survey area is demonstrated in **Figure 4** which will require agreement with Warwickshire County Council and National Highways as part of future discussions.

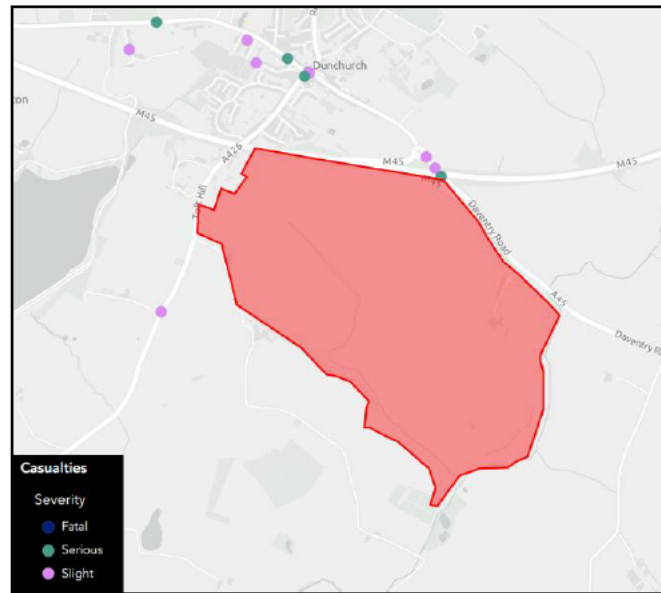


Figure 4: Collision Map (2020 – 2024)

2.18 The collision data demonstrates that incidents have occurred sporadically across the 5-year period. Four incidents have occurred near the Daventry Road roundabout approximately 200m from the site. One incident occurred along Toft Hill in 2023, approximately 400m south of the site. It is proposed these incidents are assessed further to confirm there are no existing safety concerns which would worsen as a result of the potential development.

3. TRIP GENERATION, DISTRIBUTION AND MODELLING

Trip Generation

- 3.1 To determine the likely impact of the site allocation on the operation of the local road network, a TRICS assessment has been undertaken. Given the site currently comprises agricultural use, it has been assumed all trips would be additional to the local road network for robustness.
- 3.2 A multimodal TRICS assessment has been undertaken for the proposals. The parameters used are as follows:
- TRICS V.8.25.12;
 - 'Residential', and 'Houses Privately Owned' use class;
 - Sites in England and Wales (excluding Greater London);
 - '700 – 1,817' dwellings
 - Weekday surveys only; and
 - 'Edge of Town' locations
- 3.3 Based on the TRICS assessment, the proposed trip rates and subsequent trip generation for a 1,500 dwelling scheme is demonstrated in **Table 1**, with the full TRICS outputs attached in **Appendix A**. It should be noted that 'Houses Privately Owned' has been utilised as a worse case, although in reality the proposals will comprise a mix of private and affordable as well as potential flats or apartment units (which typically results in a lower trip rate). Furthermore, the assessment below has not accounted for any internalisation of vehicle movements which would contribute to a lower total trip generation. In reality it is likely that additional non-residential land uses would be included within the scheme which would lead to a number of trips being internalised.

	AM Peak (0800-0900)			PM Peak (1700-1800)			Total Daily Trips
	Arrivals	Departures	Total	Arrivals	Departures	Total	
<i>TRICS Vehicular Trip Rate – Houses Privately Owned (per dwelling)</i>	0.129	0.350	0.479	0.319	0.146	0.465	3.740
Vehicular Trip Generation – 1,500 dwellings	194	525	719	479	219	698	5610
<i>TRICS Pedestrian Trip Rate – Houses Privately Owned (per dwelling)</i>	0.022	0.107	0.129	0.042	0.028	0.070	0.699
Pedestrian Trip Generation – 1,500 dwellings	33	161	194	63	42	105	1049
<i>TRICS Cyclist Trip Rate – Houses Privately Owned (per dwelling)</i>	0.003	0.015	0.018	0.007	0.004	0.011	0.081
Cyclist Trip Generation – 1,500 dwellings	5	23	28	11	6	17	122

Table 1: Proposed Trip Generation

- 3.4 **Table 1** demonstrates the proposed 1,500 dwellings would likely result in a worst case of 719 vehicular trips in the AM peak and 698 vehicular trips in the PM peak, with 5,610 vehicular trips across a 12-hour period. It is anticipated the scheme would result in 194 pedestrian trips and 28 cyclist trips in the AM peak with 105 pedestrian trips and 17 cyclist trips in the PM peak. Over a 12-hour period, it is anticipated the site would generate 1,049 pedestrian trips and 122 cyclist trips.

Vehicle Distribution

- 3.5 To understand the likely distribution of the vehicular trips outlined, traffic distribution data has been obtained from the 2011 'WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)' for E02006503: Rugby 012 Output Area (as shown in **Figure 5**). This dataset has been consulted to determine the likely destinations and routes undertaken by residents of the proposed development and by which proportion.

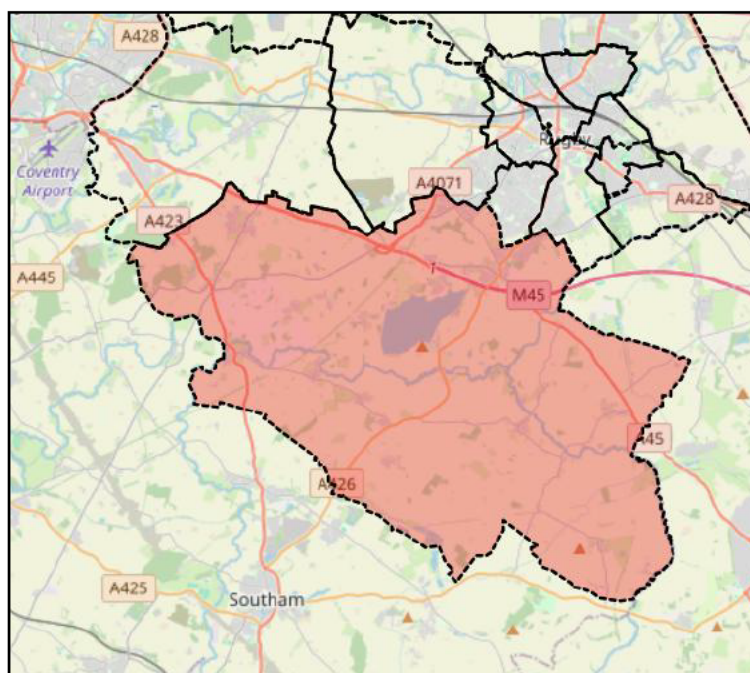


Figure 5: E02006503: Rugby 012 Output Area

- 3.6 When considering vehicle trip distributions, it is important to consider the likely access location, which is discussed further in **Chapter 6**. At this stage, it is assumed the development would primarily be served off the A45 with a secondary additional access from Toft Hill. A summary of the likely destinations and route assignments for the proposals is provided in **Table 2, 3 and 4** and is attached as **Appendix B**, with an overview of the existing and forecast shown within distribution diagrams of the local network attached as **Appendix C**.

	Site Access (A45)		Site Access (Toft Hill)	
Arm	A45 N	A45 S	Toft Hill N	Toft Hill S
% Distribution	72	11	13	4
% Total	83		17	

Table 2: % Traffic Distributions

	AM Peak (08:00 – 09:00)				PM Peak (17:00 – 18:00)			
	Site Access (A45)		Site Access (Toft Hill)		Site Access (A45)		Site Access (Toft Hill)	
Arm	A45 N	A45 S	Toft Hill N	Toft Hill S	A45 N	A45 S	Toft Hill N	Toft Hill S
Development Trips (Two-way)	515	79	93	31	500	77	91	19
Total	594		124		577		109	

Table 3: Potential Development Peak Hour Distribution

	Site Access (A45)		Site Access (Toft Hill)	
Arm	A45 N	A45 S	Toft Hill N	Toft Hill S
AADT	4,714	724	854	280

Table 4: Potential Development AADT Distribution

Modelling Scope

- 3.7 The scope of impact assessment would be discussed and agreed through future engagement with the highway authority. However, following an assessment of likely traffic distributions the following key junctions are likely to require assessment:
1. A45 Site Access;
 2. Toft Hill Site Access;
 3. Daventry Road roundabout;
 4. Coventry Road / Rugby Road / Southam Road / Daventry Road junction; and
 5. Thurlaston Interchange roundabout.
- 3.8 Once the scope of assessment has been agreed, traffic surveys would be commissioned to ascertain the turning counts and baseline traffic conditions at each of the junctions. In addition, Automatic Traffic Count (ATC) surveys would be taken at the site access to determine actual speeds along the A45 and Toft Hill which would inform the proposed access arrangements.

4. ACCESS ARRANGEMENTS

4.1 As previously shown in **Chapter 3**, the majority of trips are anticipated to utilise the A45 (83% of trips) based on existing travel behaviour. In addition, the conditions of the A45 present good opportunity to facilitate a primary access to the site with wide carriageways and achievable visibility (detailed further in this Chapter). Whereas, from on-site observations, Toft Hill is narrower in nature and access to and from Toft Hill is more challenging in places as signage to discourage Heavy Goods Vehicles (HGVs) from using this route from the south (A426) is present. Therefore, the following access arrangements present a scenario in which the A45 is utilised as the primary access with an additional access proposed along Toft Hill.

4.2 To determine an appropriate access arrangement to support the site, the Design Manual for Roads and Bridges (DMRB) Design Guidance has been reviewed in relation to Figure 2.3.1 of CD109 as shown in **Figure 6**. The diagram illustrates the minor and major road thresholds for which access type would be required.

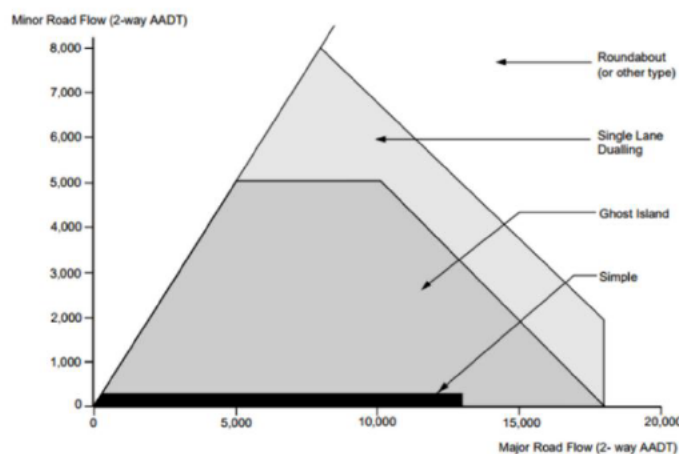


Figure 6: DMRB CD109 Guidance Figure 2.3.1 'Appropriate priority junction provision on single carriageway roads based on flows only'

4.3 Traffic surveys would be undertaken to support any future planning application to determine the major arm flows.

A45 Site Access

4.4 To inform the site access assessment, the average daily flow of traffic has been determined using Department for Transport's (DfT's) Manual Count Point (MCP) site 16,448 located within vicinity of the site. The MCP 16448 registered a total of 11,380 two-way Annual Average Daily Traffic (AADT) along the A45 (major road), with 5,437 two-way AADT resulting from the proposed site access (minor road).

- 4.5 Based on the conditions of the A45, the findings which show that the existing traffic flows are below the 13,000 threshold for a simple priority junction, and that only 11% of development distributed vehicle movements would travel south on the A45, a right turn lane arrangement has been considered. The proposed access arrangement is attached within **Appendix D**, and highlights geometries referenced in accordance with DMRB CD123 which utilises the existing carriageway width including indicative road markings. It should be noted that the achievability of this access would require further assessment with the benefit of highway boundary mapping, traffic surveys and a topographical survey.
- 4.6 Visibility splays measuring 2.4m x 160m have been drawn in line with DMRB guidance for a 50mph speed limit. These are shown to be achievable within **Appendix D**, subject to the maintenance of vegetation below 0.6m and confirmation that visibility splays fall within land of the site boundary and/or the highway boundary extent.
- 4.7 Vehicle tracking of appropriate vehicles (16.5m articulated vehicle, refuse vehicle and bus) have been undertaken to demonstrate the proposed access arrangements would be suitable for vehicular access. This is attached in **Appendix D**.

Toft Hill Site Access

- 4.8 For the assessment of a suitable junction along Toft Hill, the average daily flow of traffic has been determined using DfT's MCP 47147 located within vicinity of the site. MCP 47147 registered a total of 5,538 two-way AADT along Toft Hill in 2024. The proposed development would generate 1,135 two-way AADT at the site access.
- 4.9 Application of these flows to **Figure 6** would ordinarily suggest consideration of a right-turn lane; however, analysis of the predicted traffic distribution indicates that the majority of development-related movements will travel to and from Toft Hill North and would not utilise a right turn provision. A forecasted 4% of total development trips are anticipated to turn right into the site (140 AADT), and both this turning flow and the observed mainline two-way flow (5,549 AADT) fall below the relevant DMRB thresholds typically associated with the need for a dedicated right-turn facility. Accordingly, a simple priority junction is considered proportionate to the level and nature of demand and is proposed for this location, as detailed in **Appendix E**.
- 4.10 Visibility splays measuring 2.4m x 160m have been drawn in line with DMRB guidance for a 50mph speed limit. These are shown to be achievable within **Appendix E**, subject to the maintenance of vegetation below 0.6m (in line with Manual for Streets guidance).

- 4.11 The location of the proposed access has been advised based on achieving complaint visibility splays to avoid conflict with assumed third party land. It is noted that the site frontage with Toft Hill experiences varying level changes, including the formation of an extent of ditching. As a result, it is advised that visibility splays be reviewed to confirm that stopping sight distances are achievable in the vertical plane, and that complaint access gradients can be maintained.
- 4.12 Vehicle tracking of anticipated vehicles (16.5m articulated vehicle, private car and bus) has been undertaken to demonstrate the proposed access arrangements would be suitable for vehicular access. This is attached in **Appendix E**.
- 4.13 It is noted that the change in speed limit point located north of the site frontage with Toft Hill could be relocated further south to extend the natural settlement boundary and create a residential environment aligned to the internal speeds of any further proposed development. If progressed through a traffic regulation order process reduced visibility splays could be established and the requirements for any pedestrian crossing updated.

Emergency Access

- 4.14 The existing access within the northwestern corner of the site is currently utilised for agricultural access to the site. The existing access measures approximately 5m wide, with a maximum potential width of up to 6m at the entrance between the adjacent M45 bridge and neighbouring property. Vehicular access from this location would also need to take account of PRow R25c which runs adjacent to the northern site boundary at this point before connecting to Southam Road. Taking the conditions and available space into consideration, it is proposed that this connection to the public highway could be utilised as an emergency/pedestrian-cycle access to support the potential development.

Pedestrian and Cycle Access

- 4.15 To support a sustainable development and encourage the use of active travel, good pedestrian and cycle links will be fundamental. The existing PRow's illustrated in **Chapter 2** present an excellent opportunity to provide a link between the village and the site. As part of a future development, consultation is recommended with the Warwickshire County Council's (WCC) PRow Team to determine to what extent these connections could be upgraded alongside integration into the potential development.
- 4.16 It is proposed that the existing footway which operates from the site and adjacent with the A45 be upgraded where possible to provide footways of at least 2m wide, with potential to establish a shared cycle route, depending on the available highway land. Enhanced street lighting should be provided,

particularly where the route passes under the M45. Appropriate crossing facilities and further investigation to confirm adequate visibility will be required at the arms of the Daventry Road roundabout junction. As identified within Figure 2, PRoW route R235 terminates north of the Daventry Road roundabout, where an informal and uncontrolled crossing links to PRoW R176 and footway provided east of Daventry Road. To provide a continuous pedestrian connection from the site location, investigation into a formal crossing facility at this location will be required.

- 4.17 The footways along Toft Hill present opportunity for pedestrian trips to be made from the western side of the site towards facilities in Dunchurch. It is proposed that existing footways be widened to at least 2m wide to facilitate pedestrian movements. An appropriate crossing facility to facilitate safe access from the site to existing footways along Toft Hill is suggested. Based on the vehicle speed limit at this section of Toft Hill and the review of existing/forecast AADT movements, a signalised crossing would currently be required in accordance with LTN 1/20 Table 10-2. Alternatively, subject to confirmation of available highway verge, a footway connecting with the site boundary on the eastern edge of Toft Hill could be investigated further to avoid provision of a pedestrian crossing.
- 4.18 Given the steep gradient present at the site frontage with Toft Hill, it is proposed that cycle movements be routed through the potential emergency access at Southam Road.

Public Transport

- 4.19 To support public transport accessibility at the site, there is an opportunity to integrate the existing Service 63 operated by Stagecoach Midlands, which currently provides connections between Royal Leamington Spa, Southam and Rugby. Given the scale of the potential development, it would be appropriate for new dwellings to be located within 400m of a bus stop, in accordance with guidance set out in CIHT Planning for Walking (2015).
- 4.20 Accordingly, early consultation with local bus operators is recommended to explore whether the Service 63 routing could be accommodated through the development. It is anticipated that public transport contributions may be required to support any diversion of the service, including measures to maintain or enhance service frequency and to offset additional journey time associated with serving the site.
- 4.21 Based on the potential access arrangements from both the A47 and Toft Hill, there is scope for the service to pass through the development in a linear manner, avoiding the need for a looped diversion that could otherwise reduce service attractiveness and operational efficiency.

5. SUMMARY AND CONCLUSIONS

5.1 This Transport Feasibility Study (TFS) has been prepared by Paul Basham Associates on behalf of Sworders to assess the potential for a residential development comprising 1,500 dwellings at Land South of M45 Dunchurch, Rugby.

5.2 The following conclusions have been drawn through this assessment:

- The site is within a sustainable location, being within walking distance of the centre of Dunchurch with good public transport links to Rugby and Leamington Spa. Through sustainable improvements including the widening and improvement of existing footways and PROW routes as well as contributions to the bus services, there is potential for the proposed development to promote sustainable travel.
- A pedestrian crossing is anticipated to be required along Toft Hill to support safe pedestrian movements towards Dunchurch.
- The survey area covered within the collision data will need to be agreed with the local highway authority and further investigation into nearby collisions will be required. However, from an initial review there does not appear to be any existing safety issues which would worsen as a result of the proposals.
- A trip generation assessment was undertaken which demonstrated the proposals would result in a in a worst case of 719 vehicular trips in the AM peak and 698 vehicular trips in the PM peak, with 5610 vehicular trips across a 12-hour period. Over a 12-hour period, it is anticipated the site would generate 1,049 pedestrian trips and 122 cyclist trips. The scheme may in the future propose some on-site facilities which would result in a proportion of internalised trips and therefore the assessment of vehicle trip generation represents a robust scenario
- Census data was analysed to assess the likely trip distributions as a result of the proposed development. This concluded that 83% of trips are likely to utilise an access from the A45, with 17% utilising the access along Toft Hill.
- The scope of junction modelling would be discussed and agreed within pre-application discussions including the agreed junctions and scenarios.
- The proposed access arrangements have been developed utilising DMRB CD109 guidance with dimensions and visibility splays in accordance with national guidance.
- There is potential for the existing access within the north western corner of the site to be utilised as an emergency access, which could also be used primarily as a pedestrian and cycle access.
- Local PROW routes present excellent opportunity for providing safe pedestrian access to/from the site.



Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use: 03 - RESIDENTIAL

Category: A - HOUSES PRIVATELY OWNED

Selected Vehicle Type: Cyclists

Selected regions and areas:

02	SOUTH EAST		
	SC	SURREY	1 day
04	WS	WEST SUSSEX	1 day
	EAST ANGLIA		
	NF	NORFOLK	2 days

This section displays the number of survey days per TRICS® sub-region in the selected set.



Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

Primary Filtering Selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter:	DWELLS
Actual Range:	790 to 1817 (units:DWELLS)
Range Selected by User:	700 to 1817 (units:DWELLS)
Parking Spaces Range:	6 - 2824

Public Transport Provision:	
Selection by:	All Surveys Included
Date Range:	05/05/87 to 30/06/25

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:	
Thursday	2 days
Tuesday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:	
Manual count	4
Direction ATC Count	0

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines

Selected Locations:	
Edge of Town	4 days

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:	
Residential Zone	4 days

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicle Counts:	
Servicing vehicles Included	2 days
Servicing vehicles Unknown	2 days



Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

Secondary Filtering Selection:

Use Class:

C3	4 surveys
----	-----------

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

805 - 3100

Population within 1 mile:

1,001 to 5,000	1 surveys
10,001 to 15,000	1 surveys
15,001 to 20,000	1 surveys
5,001 to 10,000	1 surveys

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

125,001 to 250,000	3 surveys
75,001 to 100,000	1 surveys

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	1 surveys
1.1 to 1.5	2 surveys
1.6 to 2.0	1 surveys

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.



Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

Petrol filling station:

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

Travel Plan:

Yes 4 surveys

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present 4 surveys

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

COVID-19 Restrictions:

No



Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

1	NF-03-A-09	MIXED HOUSES & FLATS	NORFOLK
ROUND HOUSE WAY NORWICH CRINGLEFORD Edge of Town Residential Zone Site area: 44.5099983215332 hect Survey date: Tuesday 24/09/2019			
		Survey Type: Manual	
2	NF-03-A-28	MIXED HOUSES & FLATS	NORFOLK
ATLANTIC AVENUE NORWICH SPROWSTON Edge of Town Residential Zone Site area: 38 hect Survey date: Thursday 22/09/2022			
		Survey Type: Manual	
3	SC-03-A-15	MIXED HOUSES	SURREY
REIGATE ROAD HORLEY Edge of Town Residential Zone Site area: 59 hect Survey date: Thursday 24/04/2025			
		Survey Type: Manual	
4	WS-03-A-11	MIXED HOUSES	WEST SUSSEX
ELLIS ROAD WEST HORSHAM S BROADBRIDGE HEATH Edge of Town Residential Zone Site area: 50 hect Survey date: Tuesday 02/04/2019			
		Survey Type: Manual	

Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Total Vehicles

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.061	0.275	0.336
08:00-09:00	4	1056	0.129	0.350	0.479
09:00-10:00	4	1056	0.113	0.136	0.249
10:00-11:00	4	1056	0.088	0.108	0.196
11:00-12:00	4	1056	0.094	0.090	0.184
12:00-13:00	4	1056	0.116	0.120	0.236
13:00-14:00	4	1056	0.117	0.108	0.225
14:00-15:00	4	1056	0.125	0.139	0.264
15:00-16:00	4	1056	0.199	0.135	0.334
16:00-17:00	4	1056	0.231	0.135	0.366
17:00-18:00	4	1056	0.319	0.146	0.465
18:00-19:00	4	1056	0.278	0.128	0.406
Data after 19:00 deselected by time slice					
Total Rates:			1.870	1.870	3.740

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	02/04/2019 - 24/04/2025
Number of weekdays (Monday-Friday):	4
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Total People

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.090	0.436	0.526
08:00-09:00	4	1056	0.187	0.709	0.896
09:00-10:00	4	1056	0.167	0.215	0.382
10:00-11:00	4	1056	0.140	0.174	0.314
11:00-12:00	4	1056	0.157	0.141	0.298
12:00-13:00	4	1056	0.180	0.179	0.359
13:00-14:00	4	1056	0.178	0.160	0.338
14:00-15:00	4	1056	0.207	0.206	0.413
15:00-16:00	4	1056	0.436	0.214	0.650
16:00-17:00	4	1056	0.424	0.209	0.633
17:00-18:00	4	1056	0.500	0.241	0.741
18:00-19:00	4	1056	0.446	0.209	0.655
Data after 19:00 deselected by time slice					
Total Rates:			3.112	3.093	6.205

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	02/04/2019 - 24/04/2025
Number of weekdays (Monday-Friday):	4
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Cyclists

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.002	0.004	0.006
08:00-09:00	4	1056	0.003	0.015	0.018
09:00-10:00	4	1056	0.002	0.004	0.006
10:00-11:00	4	1056	0.001	0.001	0.002
11:00-12:00	4	1056	0.002	0.001	0.003
12:00-13:00	4	1056	0.001	0.001	0.002
13:00-14:00	4	1056	0.002	0.001	0.003
14:00-15:00	4	1056	0.003	0.002	0.005
15:00-16:00	4	1056	0.005	0.000	0.005
16:00-17:00	4	1056	0.004	0.003	0.007
17:00-18:00	4	1056	0.007	0.004	0.011
18:00-19:00	4	1056	0.008	0.005	0.013
Data after 19:00 deselected by time slice					
Total Rates:			0.040	0.041	0.081

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	02/04/2019 - 24/04/2025
Number of weekdays (Monday-Friday):	4
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

PSVs

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.000	0.000	0.000
08:00-09:00	4	1056	0.001	0.001	0.002
09:00-10:00	4	1056	0.001	0.001	0.002
10:00-11:00	4	1056	0.001	0.001	0.002
11:00-12:00	4	1056	0.001	0.001	0.002
12:00-13:00	4	1056	0.001	0.001	0.002
13:00-14:00	4	1056	0.001	0.000	0.001
14:00-15:00	4	1056	0.001	0.001	0.002
15:00-16:00	4	1056	0.001	0.001	0.002
16:00-17:00	4	1056	0.001	0.001	0.002
17:00-18:00	4	1056	0.001	0.001	0.002
18:00-19:00	4	1056	0.001	0.001	0.002
Data after 19:00 deselected by time slice					
Total Rates:			0.011	0.010	0.021

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	02/04/2019 - 24/04/2025
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

OGVs

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.000	0.001	0.001
08:00-09:00	4	1056	0.001	0.001	0.002
09:00-10:00	4	1056	0.000	0.001	0.001
10:00-11:00	4	1056	0.001	0.001	0.002
11:00-12:00	4	1056	0.002	0.001	0.003
12:00-13:00	4	1056	0.001	0.002	0.003
13:00-14:00	4	1056	0.001	0.001	0.002
14:00-15:00	4	1056	0.002	0.001	0.003
15:00-16:00	4	1056	0.000	0.001	0.001
16:00-17:00	4	1056	0.001	0.000	0.001
17:00-18:00	4	1056	0.001	0.001	0.002
18:00-19:00	4	1056	0.000	0.000	0.000
Data after 19:00 deselected by time slice					
Total Rates:			0.010	0.011	0.021

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	24/09/2019 - 24/04/2025
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Taxis

Calculation factor: 1 DWELLS

*BOLD print indicates peak (busiest) period

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.002	0.002	0.004
08:00-09:00	4	1056	0.004	0.005	0.009
09:00-10:00	4	1056	0.002	0.002	0.004
10:00-11:00	4	1056	0.001	0.001	0.002
11:00-12:00	4	1056	0.001	0.001	0.002
12:00-13:00	4	1056	0.002	0.002	0.004
13:00-14:00	4	1056	0.002	0.002	0.004
14:00-15:00	4	1056	0.002	0.001	0.003
15:00-16:00	4	1056	0.004	0.004	0.008
16:00-17:00	4	1056	0.003	0.003	0.006
17:00-18:00	4	1056	0.003	0.003	0.006
18:00-19:00	4	1056	0.002	0.002	0.004
Data after 19:00 deselected by time slice					
Total Rates:			0.028	0.028	0.056

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	02/04/2019 - 24/04/2025
Number of weekdays (Monday-Friday):	4
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Cars

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.052	0.247	0.299
08:00-09:00	4	1056	0.111	0.323	0.434
09:00-10:00	4	1056	0.098	0.120	0.218
10:00-11:00	4	1056	0.072	0.091	0.163
11:00-12:00	4	1056	0.076	0.073	0.149
12:00-13:00	4	1056	0.101	0.101	0.202
13:00-14:00	4	1056	0.099	0.091	0.190
14:00-15:00	4	1056	0.107	0.121	0.228
15:00-16:00	4	1056	0.177	0.114	0.291
16:00-17:00	4	1056	0.200	0.117	0.317
17:00-18:00	4	1056	0.294	0.129	0.423
18:00-19:00	4	1056	0.255	0.116	0.371
Data after 19:00 deselected by time slice					
Total Rates:			1.642	1.643	3.285

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	02/04/2019 - 24/04/2025
Number of weekdays (Monday-Friday):	4
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

LGVs

Calculation factor: 1 DWELLS

*BOLD print indicates peak (busiest) period

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.006	0.022	0.028
08:00-09:00	4	1056	0.010	0.017	0.027
09:00-10:00	4	1056	0.012	0.013	0.025
10:00-11:00	4	1056	0.011	0.013	0.024
11:00-12:00	4	1056	0.013	0.014	0.027
12:00-13:00	4	1056	0.010	0.013	0.023
13:00-14:00	4	1056	0.013	0.012	0.025
14:00-15:00	4	1056	0.012	0.013	0.025
15:00-16:00	4	1056	0.015	0.013	0.028
16:00-17:00	4	1056	0.024	0.012	0.036
17:00-18:00	4	1056	0.018	0.010	0.028
18:00-19:00	4	1056	0.014	0.007	0.021
Data after 19:00 deselected by time slice					
Total Rates:			0.158	0.159	0.317

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	02/04/2019 - 24/04/2025
Number of weekdays (Monday-Friday):	4
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Motorcycles

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.001	0.002	0.003
08:00-09:00	4	1056	0.000	0.004	0.004
09:00-10:00	4	1056	0.000	0.000	0.000
10:00-11:00	4	1056	0.001	0.001	0.002
11:00-12:00	4	1056	0.000	0.001	0.001
12:00-13:00	4	1056	0.000	0.000	0.000
13:00-14:00	4	1056	0.001	0.002	0.003
14:00-15:00	4	1056	0.001	0.002	0.003
15:00-16:00	4	1056	0.002	0.002	0.004
16:00-17:00	4	1056	0.002	0.001	0.003
17:00-18:00	4	1056	0.003	0.002	0.005
18:00-19:00	4	1056	0.005	0.003	0.008
Data after 19:00 deselected by time slice					
Total Rates:			0.016	0.020	0.036

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	02/04/2019 - 24/04/2025
Number of weekdays (Monday-Friday):	4
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Vehicle Occupants

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.076	0.367	0.443
08:00-09:00	4	1056	0.160	0.556	0.716
09:00-10:00	4	1056	0.142	0.182	0.324
10:00-11:00	4	1056	0.120	0.145	0.265
11:00-12:00	4	1056	0.132	0.115	0.247
12:00-13:00	4	1056	0.150	0.151	0.301
13:00-14:00	4	1056	0.150	0.128	0.278
14:00-15:00	4	1056	0.169	0.177	0.346
15:00-16:00	4	1056	0.345	0.180	0.525
16:00-17:00	4	1056	0.353	0.188	0.541
17:00-18:00	4	1056	0.429	0.206	0.635
18:00-19:00	4	1056	0.381	0.182	0.563
Data after 19:00 deselected by time slice					
Total Rates:			2.607	2.577	5.184

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	02/04/2019 - 24/04/2025
Number of weekdays (Monday-Friday):	4
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Pedestrians

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.011	0.033	0.044
08:00-09:00	4	1056	0.022	0.107	0.129
09:00-10:00	4	1056	0.018	0.020	0.038
10:00-11:00	4	1056	0.016	0.020	0.036
11:00-12:00	4	1056	0.018	0.016	0.034
12:00-13:00	4	1056	0.022	0.022	0.044
13:00-14:00	4	1056	0.022	0.026	0.048
14:00-15:00	4	1056	0.025	0.022	0.047
15:00-16:00	4	1056	0.065	0.027	0.092
16:00-17:00	4	1056	0.042	0.014	0.056
17:00-18:00	4	1056	0.042	0.028	0.070
18:00-19:00	4	1056	0.042	0.019	0.061
Data after 19:00 deselected by time slice					
Total Rates:			0.345	0.354	0.699

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	02/04/2019 - 24/04/2025
Number of weekdays (Monday-Friday):	4
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Public Transport Users

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.001	0.032	0.033
08:00-09:00	4	1056	0.002	0.030	0.032
09:00-10:00	4	1056	0.004	0.010	0.014
10:00-11:00	4	1056	0.004	0.008	0.012
11:00-12:00	4	1056	0.005	0.009	0.014
12:00-13:00	4	1056	0.006	0.005	0.011
13:00-14:00	4	1056	0.004	0.004	0.008
14:00-15:00	4	1056	0.010	0.005	0.015
15:00-16:00	4	1056	0.019	0.006	0.025
16:00-17:00	4	1056	0.025	0.004	0.029
17:00-18:00	4	1056	0.022	0.003	0.025
18:00-19:00	4	1056	0.015	0.003	0.018
Data after 19:00 deselected by time slice					
Total Rates:			0.117	0.119	0.236

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	02/04/2019 - 24/04/2025
Number of weekdays (Monday-Friday):	4
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Bus/Tram Passengers

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.001	0.031	0.032
08:00-09:00	4	1056	0.002	0.028	0.030
09:00-10:00	4	1056	0.004	0.008	0.012
10:00-11:00	4	1056	0.004	0.008	0.012
11:00-12:00	4	1056	0.005	0.009	0.014
12:00-13:00	4	1056	0.006	0.005	0.011
13:00-14:00	4	1056	0.004	0.004	0.008
14:00-15:00	4	1056	0.010	0.005	0.015
15:00-16:00	4	1056	0.019	0.006	0.025
16:00-17:00	4	1056	0.023	0.004	0.027
17:00-18:00	4	1056	0.022	0.003	0.025
18:00-19:00	4	1056	0.013	0.003	0.016
Data after 19:00 deselected by time slice					
Total Rates:			0.113	0.114	0.227

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	02/04/2019 - 24/04/2025
Number of weekdays (Monday-Friday):	4
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Coach Passengers

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.000	0.000	0.000
08:00-09:00	4	1056	0.000	0.001	0.001
09:00-10:00	4	1056	0.000	0.000	0.000
10:00-11:00	4	1056	0.000	0.000	0.000
11:00-12:00	4	1056	0.000	0.000	0.000
12:00-13:00	4	1056	0.000	0.000	0.000
13:00-14:00	4	1056	0.000	0.000	0.000
14:00-15:00	4	1056	0.000	0.000	0.000
15:00-16:00	4	1056	0.000	0.000	0.000
16:00-17:00	4	1056	0.000	0.000	0.000
17:00-18:00	4	1056	0.000	0.000	0.000
18:00-19:00	4	1056	0.000	0.000	0.000
Data after 19:00 deselected by time slice					
Total Rates:			0.000	0.001	0.001

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	02/04/2019 - 02/04/2019
Number of weekdays (Monday-Friday):	1
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

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Audit Code: ebb11f21-c428-43a5-b148-c7ef174144d9

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Total Rail Passengers

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
Data before 07:00 deselected by time slice					
07:00-08:00	4	1056	0.000	0.002	0.002
08:00-09:00	4	1056	0.000	0.001	0.001
09:00-10:00	4	1056	0.000	0.002	0.002
10:00-11:00	4	1056	0.000	0.000	0.000
11:00-12:00	4	1056	0.000	0.000	0.000
12:00-13:00	4	1056	0.000	0.000	0.000
13:00-14:00	4	1056	0.000	0.000	0.000
14:00-15:00	4	1056	0.001	0.000	0.001
15:00-16:00	4	1056	0.000	0.000	0.000
16:00-17:00	4	1056	0.001	0.000	0.001
17:00-18:00	4	1056	0.001	0.000	0.001
18:00-19:00	4	1056	0.002	0.000	0.002
Data after 19:00 deselected by time slice					
Total Rates:			0.005	0.005	0.010

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Parameter Summary:

Trip rate parameter range selected:	700 - 1817 (units: DWELLS)
Survey date date range:	02/04/2019 - 24/04/2025
Number of weekdays (Monday-Friday):	2
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	2
Surveys manually removed from selection:	0

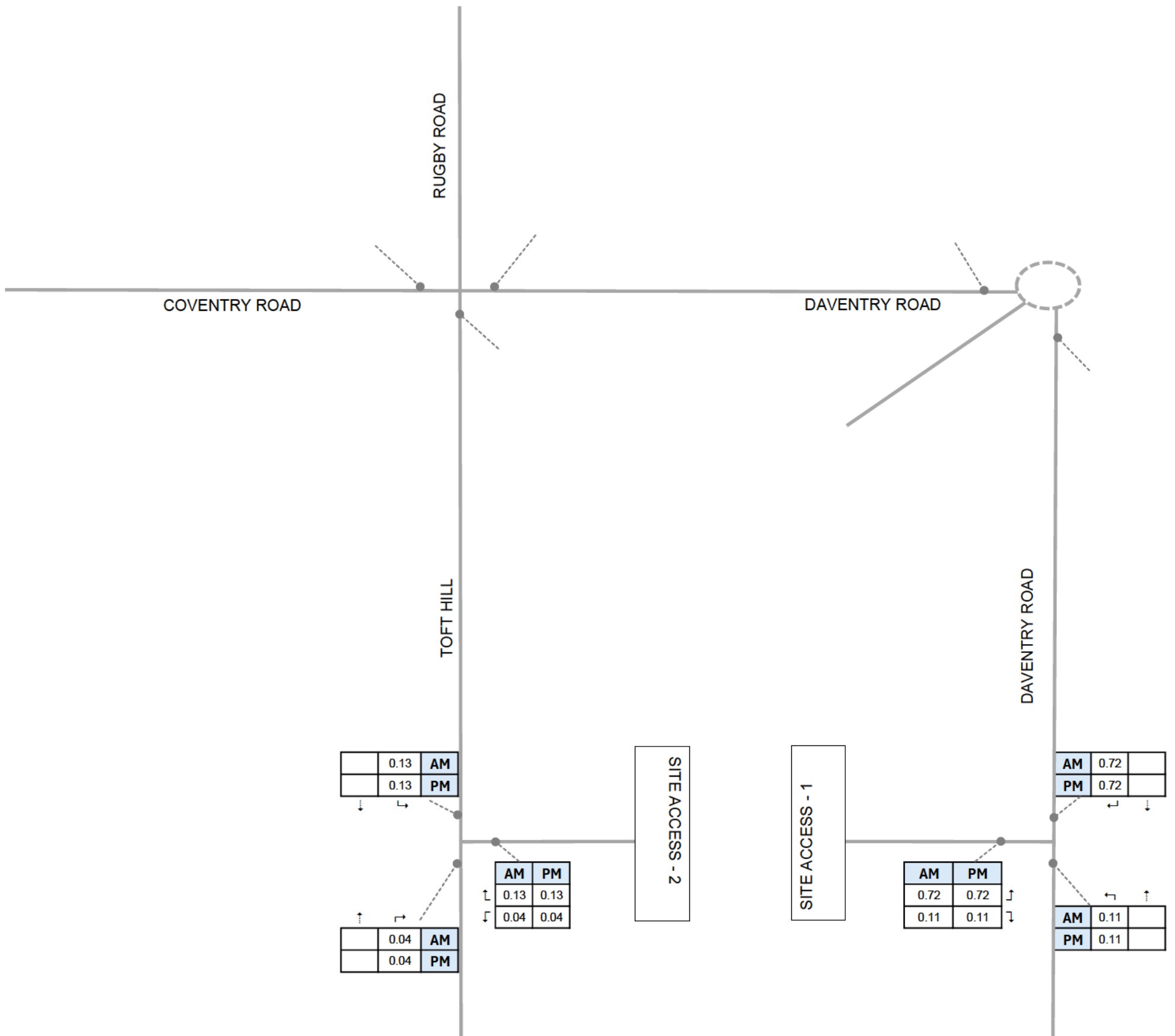
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WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)
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population All usual residents aged 16 and over in employment the week before the census
units Persons
date 2011
usual residence E02006503 : Rugby 012 (2011 super output area - middle layer)

place of work	Taxi	Driving a car or van	Totals
Kettering	0	3	3
Worcester	0	3	3
Sandwell	0	3	3
Central Bedfordshire	0	3	3
Basildon	0	3	3
Hillingdon	0	3	3
West Oxfordshire	0	3	3
Bristol, City of	0	3	3
Nottingham	0	4	4
Bromsgrove	0	4	4
Walsall	0	4	4
Oxford	0	4	4
South Oxfordshire	0	4	4
Redditch	0	5	5
Luton	0	5	5
Cotswold	0	5	5
Charnwood	0	6	6
Westminster, City of Lon	0	6	6
Derby	0	7	7
North West Leicestershi	0	7	7
South Northamptonshire	0	7	7
Dudley	0	7	7
Rugby 008	0	13	14
Blaby	0	14	14
Milton Keynes	0	14	15
Hinckley and Bosworth	0	15	15
Cherwell	0	15	16
Leicester	0	16	29
Rugby 004	0	26	31
Rugby 010	0	28	33
South Hull	0	29	42
Nuneaton and Bedworth	0	31	44
Harborough	0	33	156
Rugby 007	0	36	185
Rugby 005	0	41	331
Northampton	0	42	398
Birmingham	0	44	13
Rugby 011	0	49	26
Rugby 002	0	61	28
Rugby 006	0	64	36
Rugby 001	0	69	41
Rugby 009	1	81	49
Rugby 003	0	115	61
Daventry	0	156	64
Rugby 012	0	159	69
Stratford-on-Avon	1	185	81
Warwick	0	331	115
Coventry	0	398	159
Rugby	1	742	

		Primary Access - Daventry Road / A45		Secondary Access - Toft Hill / A426	
Totals	%	North	South	North	South
2,085		1,503	231	272	89
	100%	72%	11%	13%	4%
398	19%	318		89	
331	16%	265		66	
186	9%	186			
159	8%			89	89
156	7%		156		
115	5%	115			
82	4%	82			
69	3%	69			
64	3%	64			
61	3%	61			
49	2%	49			
44	2%	35		9	
42	2%	34		8	
41	2%	41			
36	2%	36			
33	2%	13	13	7	
31	1%	25		6	
29	1%	23		6	
28	1%	14	14		
26	1%	26			
16	1%	6	6	3	
15	1%	12		3	
15	1%		8		8
14	1%		14		
14	1%	6	6	3	
13	1%	13			
7	0%		7		
7	0%	4	4		
7	0%	3.5	3.5		
7	0%	2		2	2

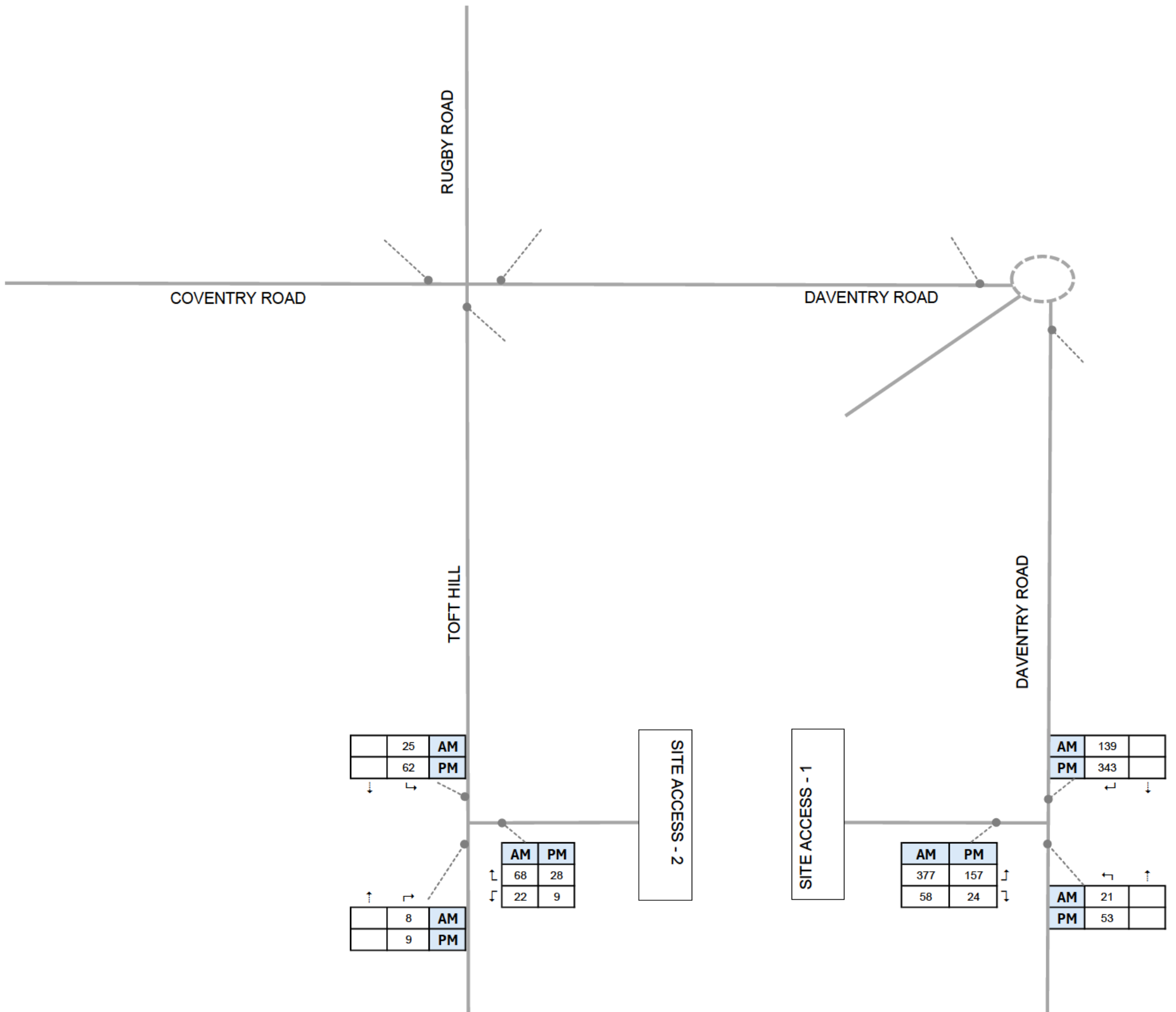




Project Name: Land South of the M45 Dunchurch, Rugby
Project Number: 1007.0031
Drawn By: GLH
Approved By: NPE

Scenario: Potential Development Peak Hour Periods

	AM	PM
ARR	194	479
DEP	525	219



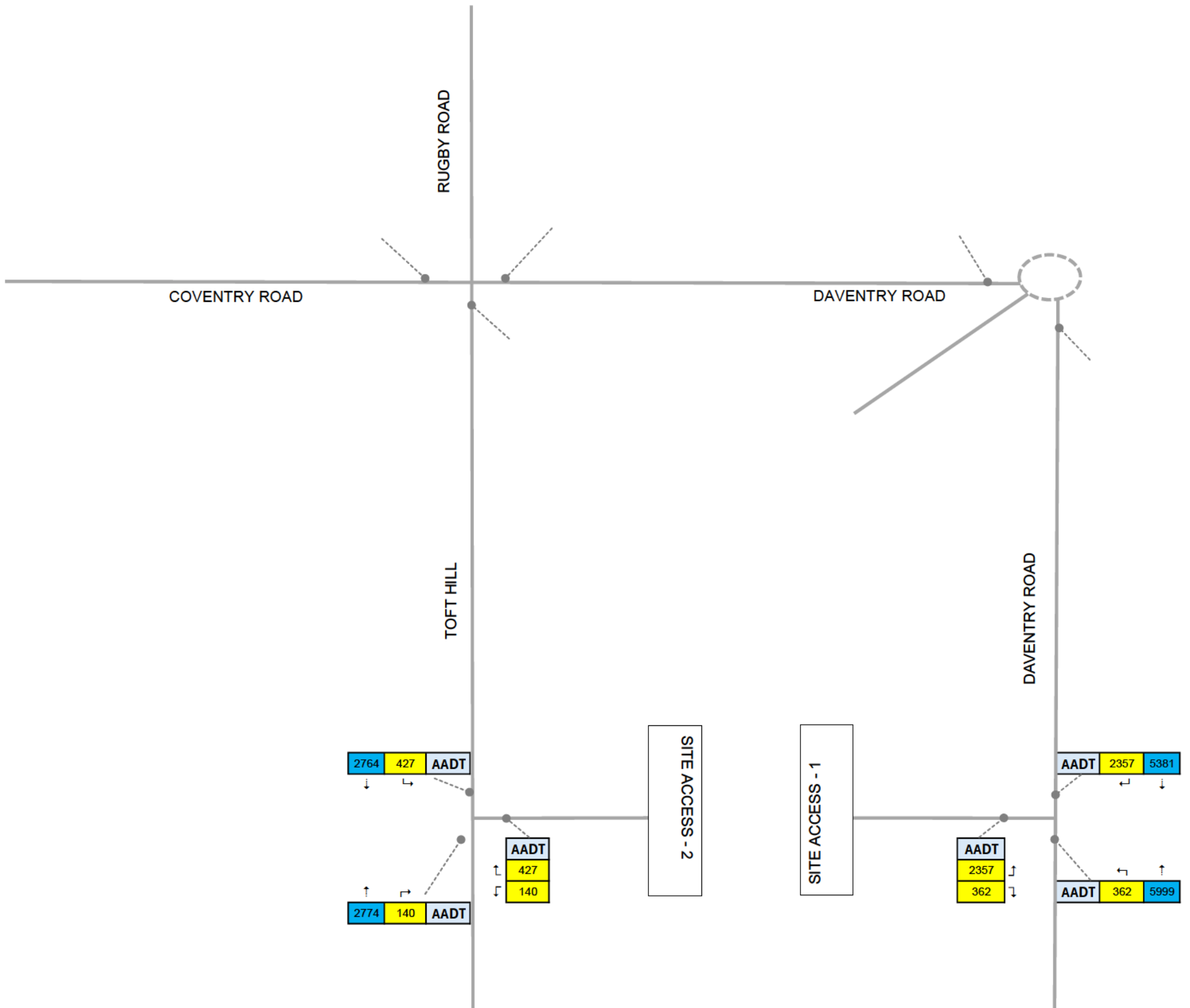


Project Name: Land South of the M45 Dunchurch, Rugby
Project Number: 1007.0031
Drawn By: GLH
Approved By: NPE

Scenario: Potential Development & Existing Flows AADT

	AM	PM
ARR	194	479
DEP	525	219
12-HOUR AADT	5610	

Existing Flows	
A47	11380
Toft Hill	5538



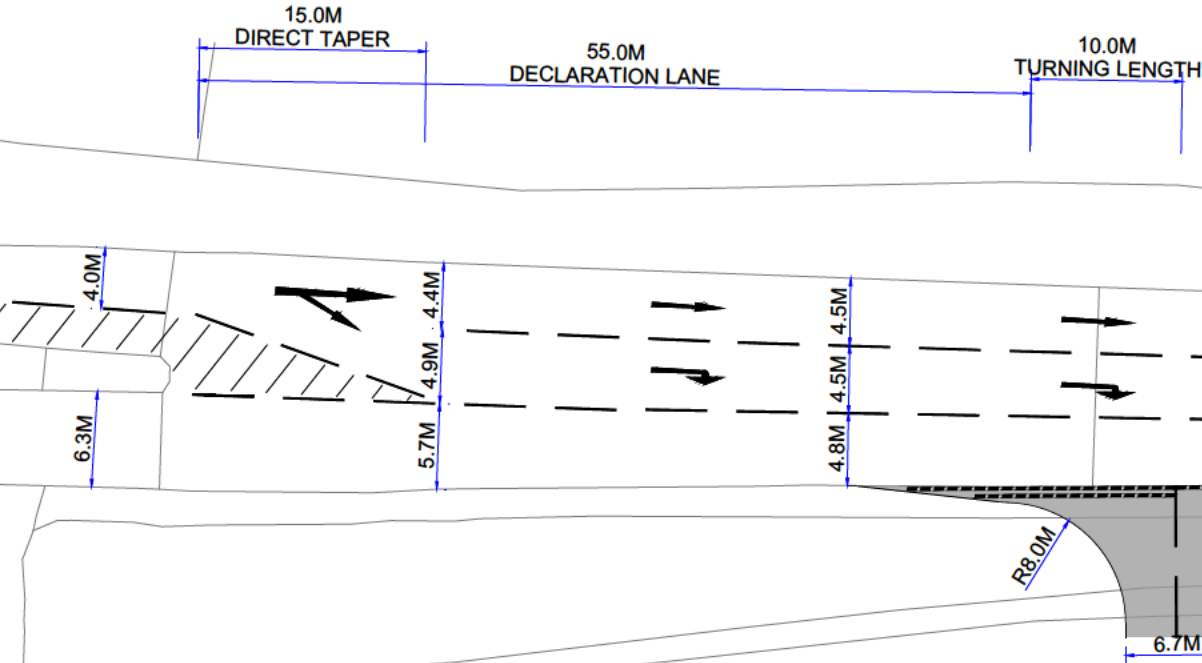
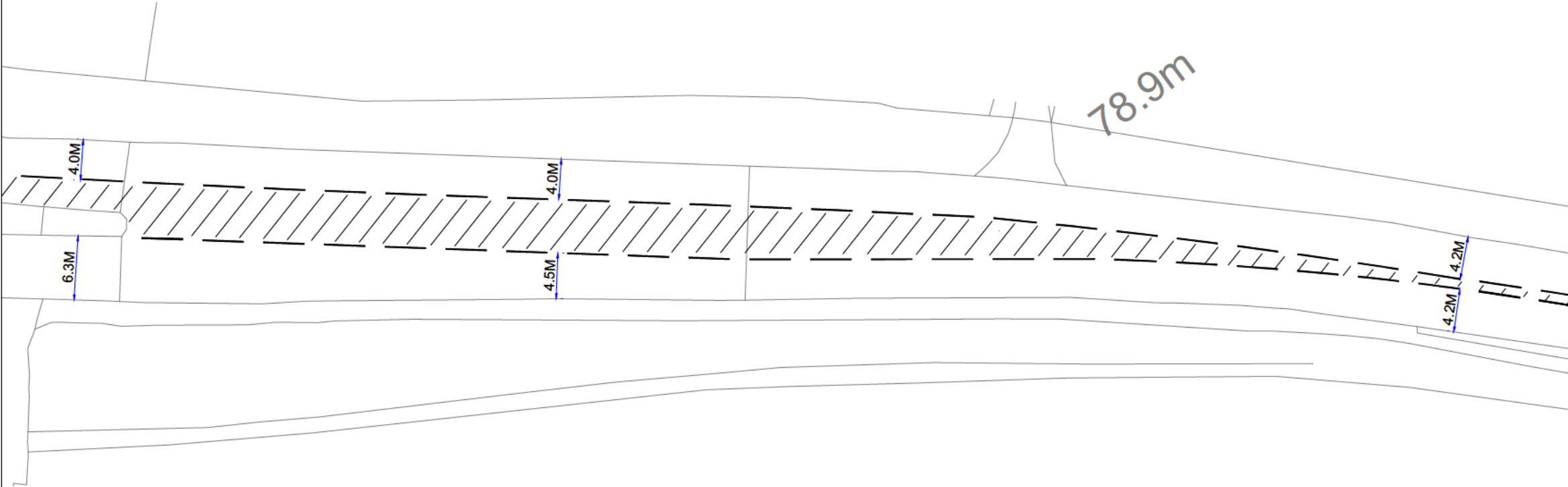
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INDICATIVE EXISTING ROAD MARKINGS ARRANGEMENT



POTENTIAL RIGHT TURN LANE ARRANGEMENT

Project Name		Title		Client		Revision	
LAND SOUTH OF M45 DUNCHURCH, RUGBY		POTENTIAL ACCESS DAVENTRY ROAD		PRIVATE CLIENT		1077.0031-0001	
Project Phase		Paul Basham Associates Ltd Milton Hall, Ely Road, Milton, Cambridge, CB24 6WZ 01223 253699 info@paulbashamassociates.com www.paulbashamassociates.com		PBA Project Number		Revision	
PRELIMINARY				1007.0031		P01	
Date Created		Drawn By		Approved By		Suitability Code	
19.02.2026		NPE		WJF		-	
PBA Drawing No:		Scale		Date		By	
		1:500		20.02.2026		NPE	
						WJF	
						(AT A3)	

PRELIMINARY

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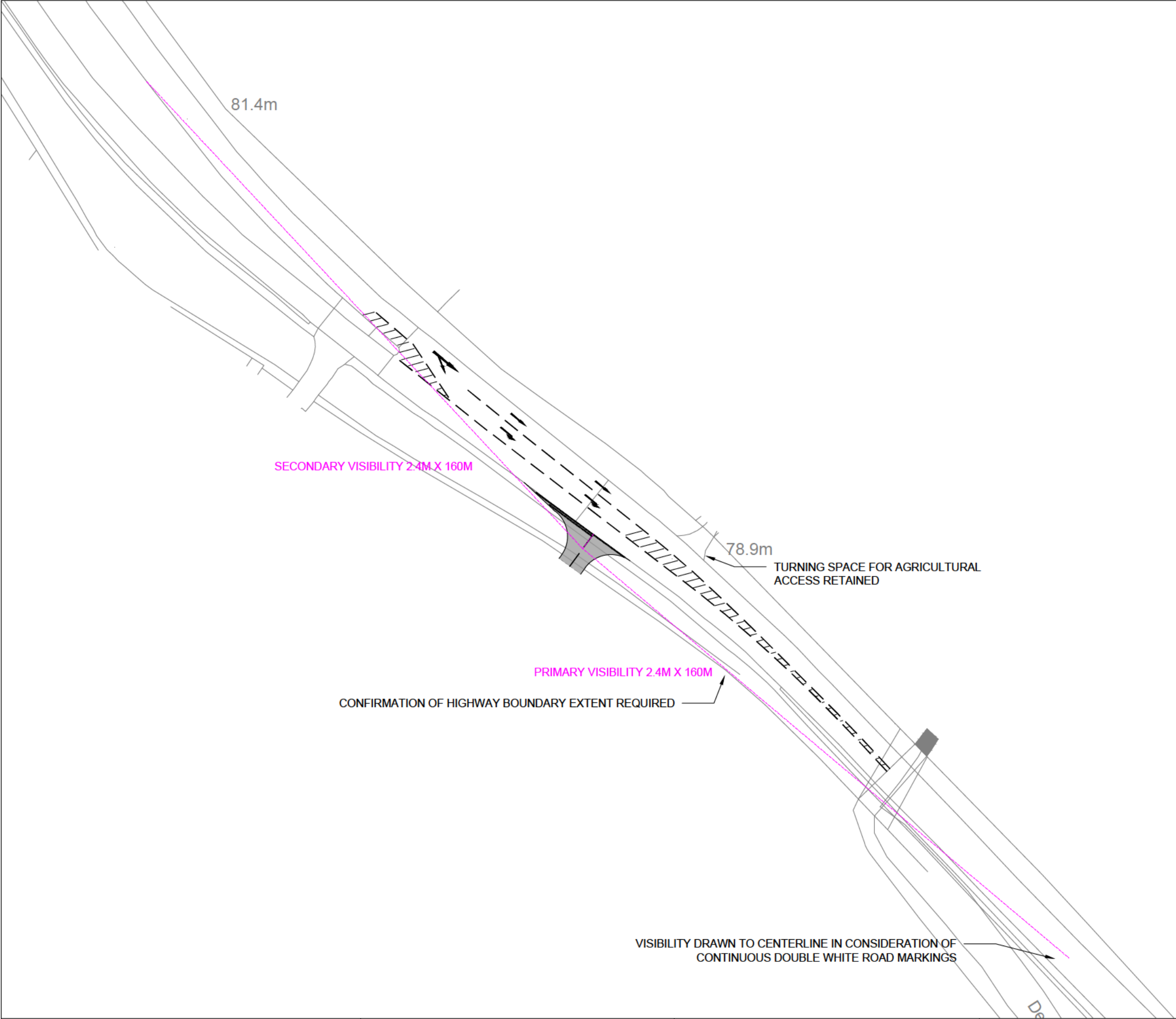


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P01	FIRST ISSUE	20.02.2026	NPE	WJF
Rev	Description	Date	By	App'd
Date Created	Drawn By	Approved By	Suitability Code	
19.02.2026	NPE	WJF	-	
PBA Project Number		Scale	(AT A3)	
1007.0031		1:1000		
PBA Drawing No:			Revision	
1077.0031-0002			P01	



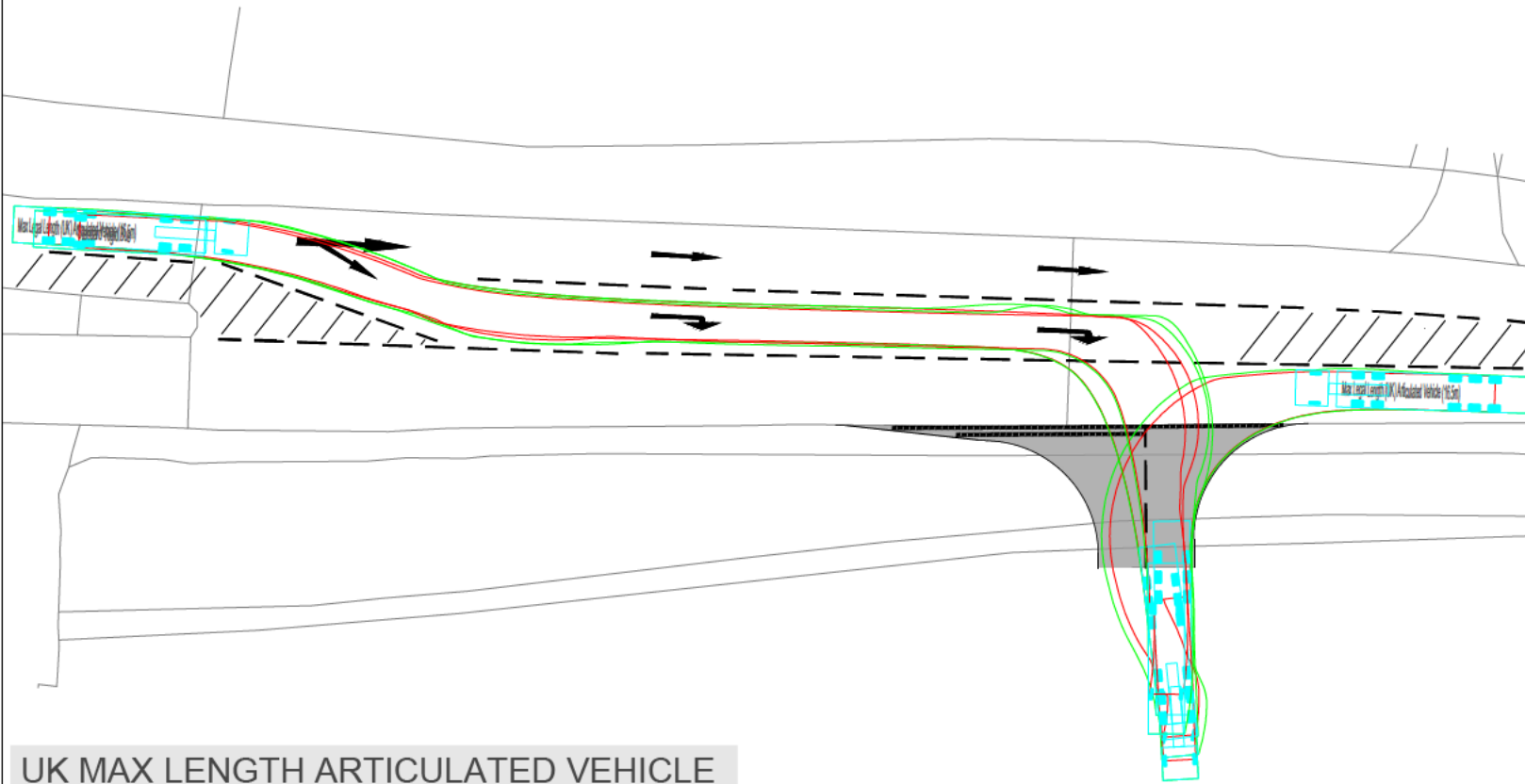
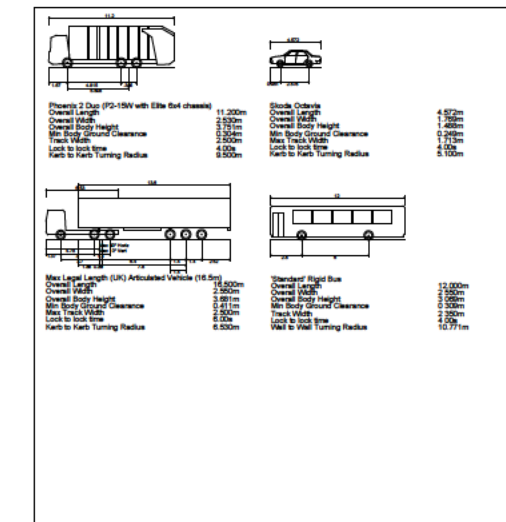
Project Name LAND SOUTH OF M45 DUNCHURCH, RUGBY	Title DAVENTRY ROAD VISIBILITY SPLAY ASSESSMENT	
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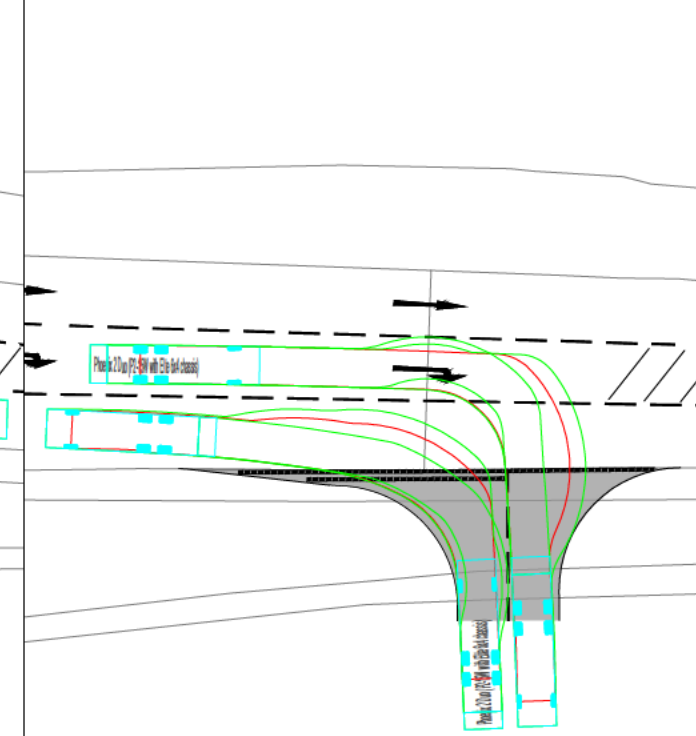
General notes

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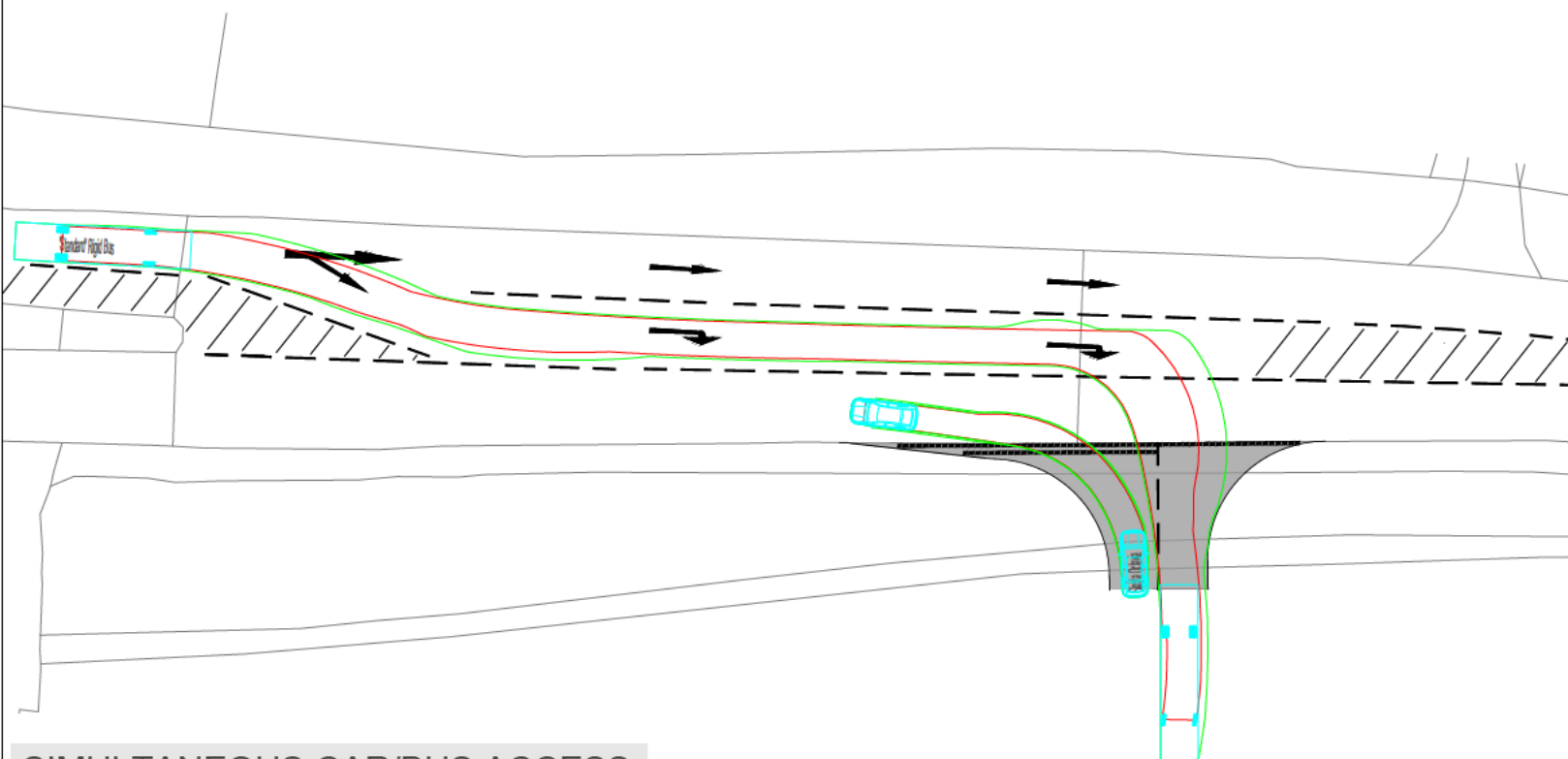
VEHICLE PROFILES:



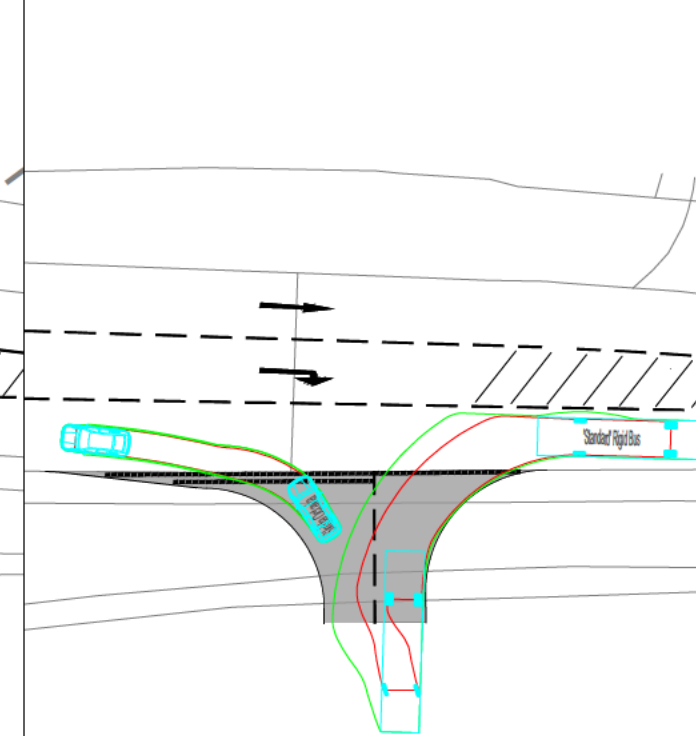
UK MAX LENGTH ARTICULATED VEHICLE



REFUSE VEHICLE ACCESS



SIMULTANEOUS CAR/BUS ACCESS



SIMULTANEOUS CAR/BUS ACCESS

PRELIMINARY

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1:500 0m 25m

P01	FIRST ISSUE	20.02.2026	NPE	WJF
Rev	Description	Date	By	App'd
Date Created	Drawn By	Approved By	Suitability Code	
19.02.2026	NPE	WJF	-	
PBA Project Number		Scale	(AT A3)	
1007.0031		1:500		
PBA Drawing No:			Revision	
1077.0031-0003			P01	

Project Name
LAND SOUTH OF M45
DUNCHURCH, RUGBY

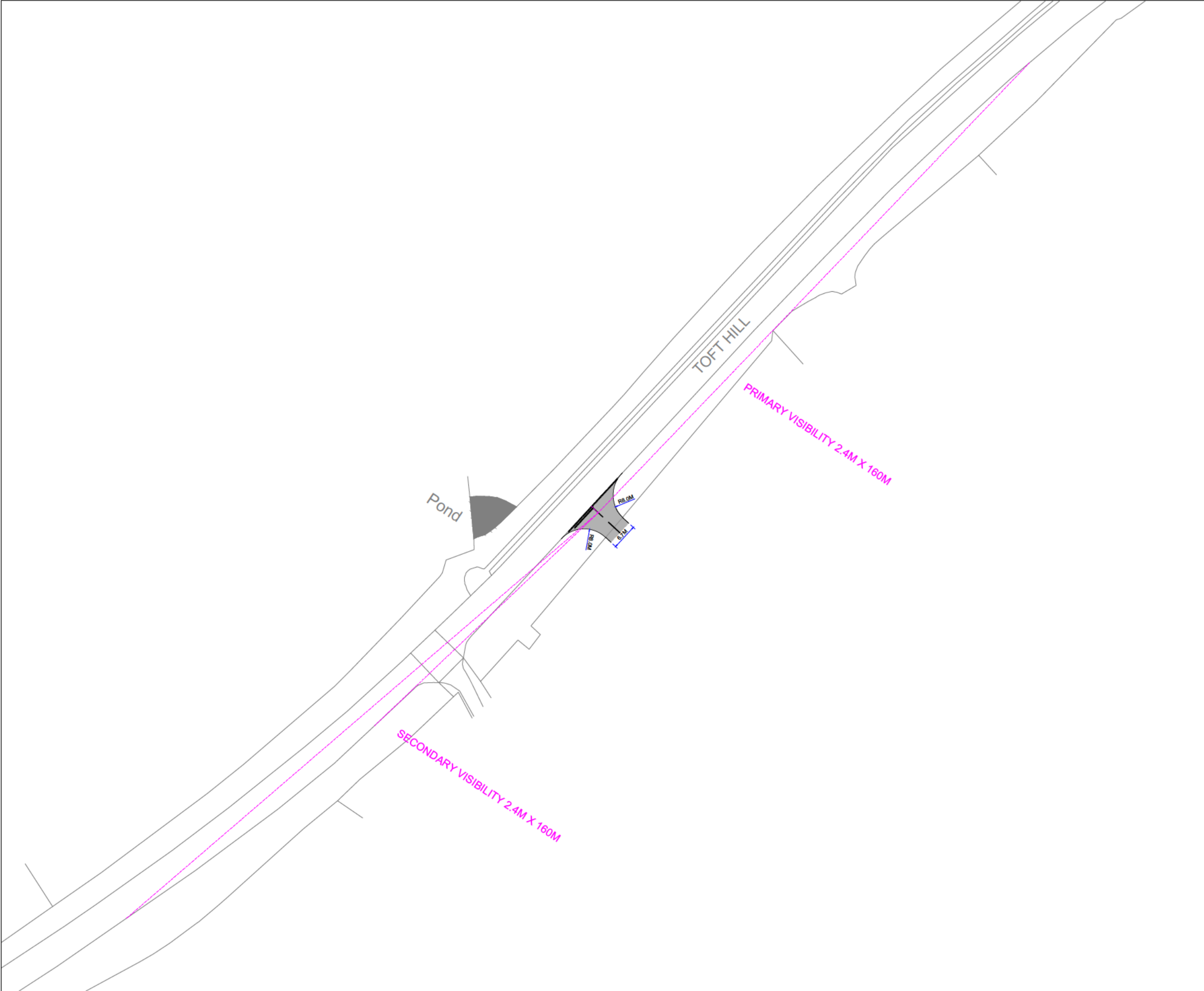
Project Phase
PRELIMINARY

Title
DAVENTRY ROAD
SWEPT PATH ANALYSIS

paul basham
associates

Paul Basham Associates Ltd
Milton Hall, Ely Road, Milton,
Cambridge, CB24 6WZ
01223 253699
info@paulbashamassociates.com www.paulbashamassociates.com

Client
PRIVATE CLIENT



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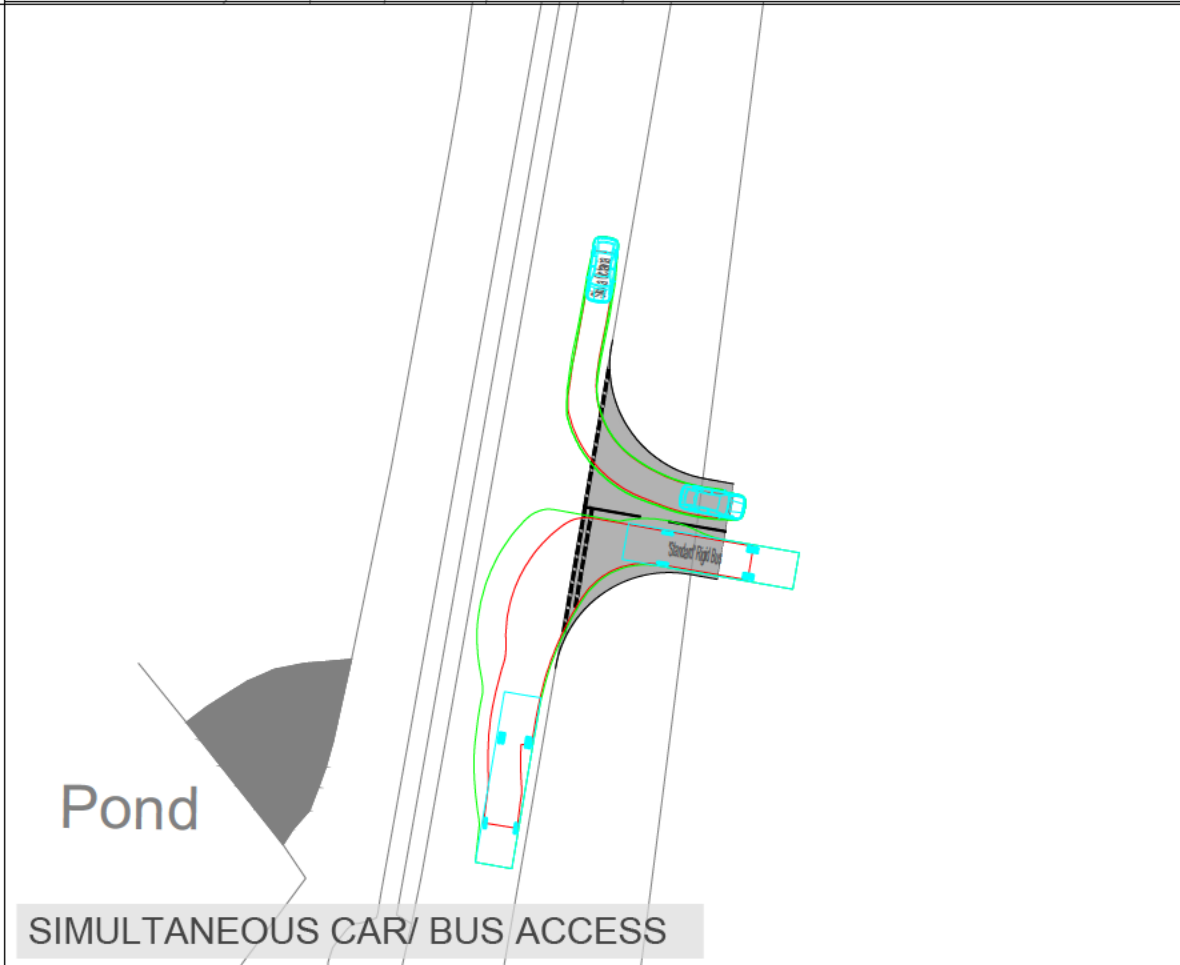
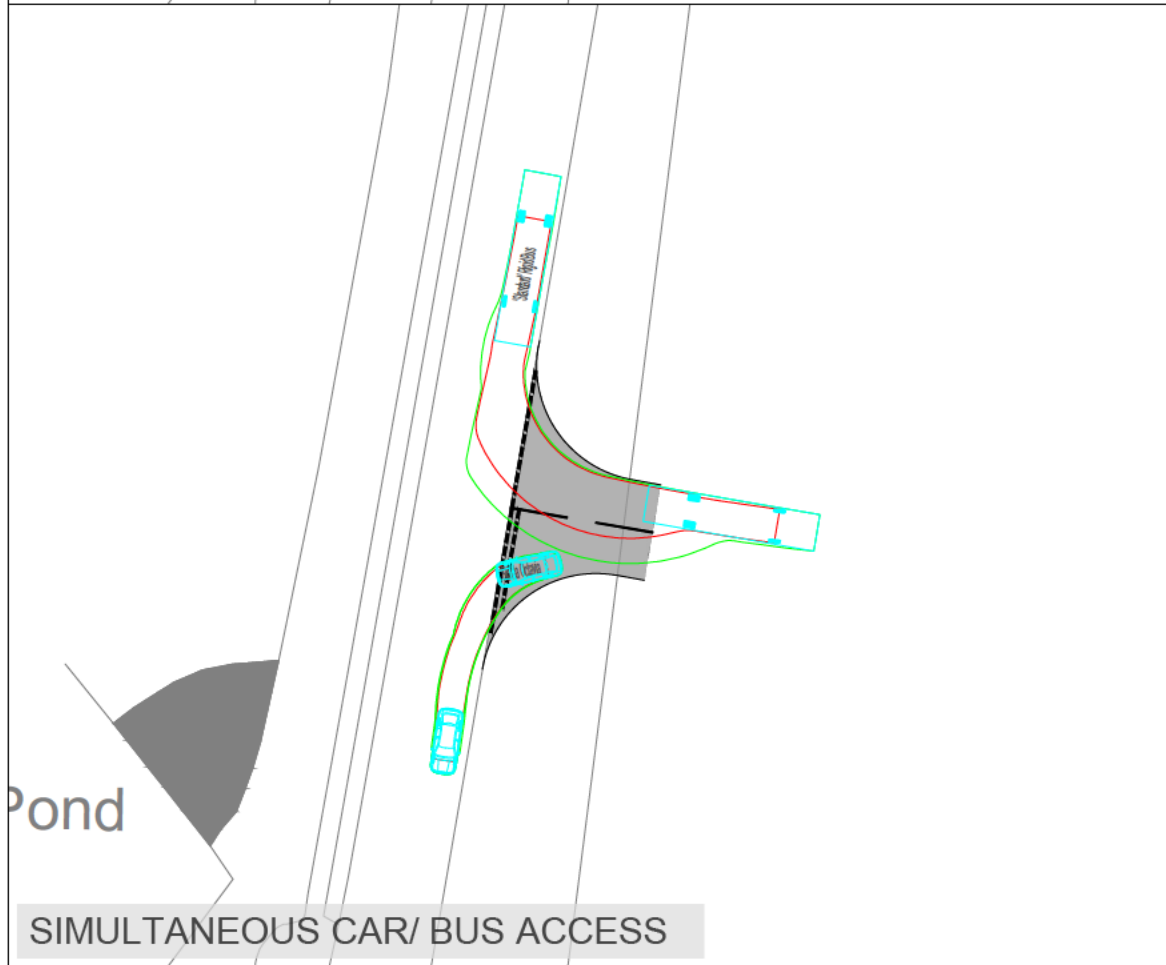
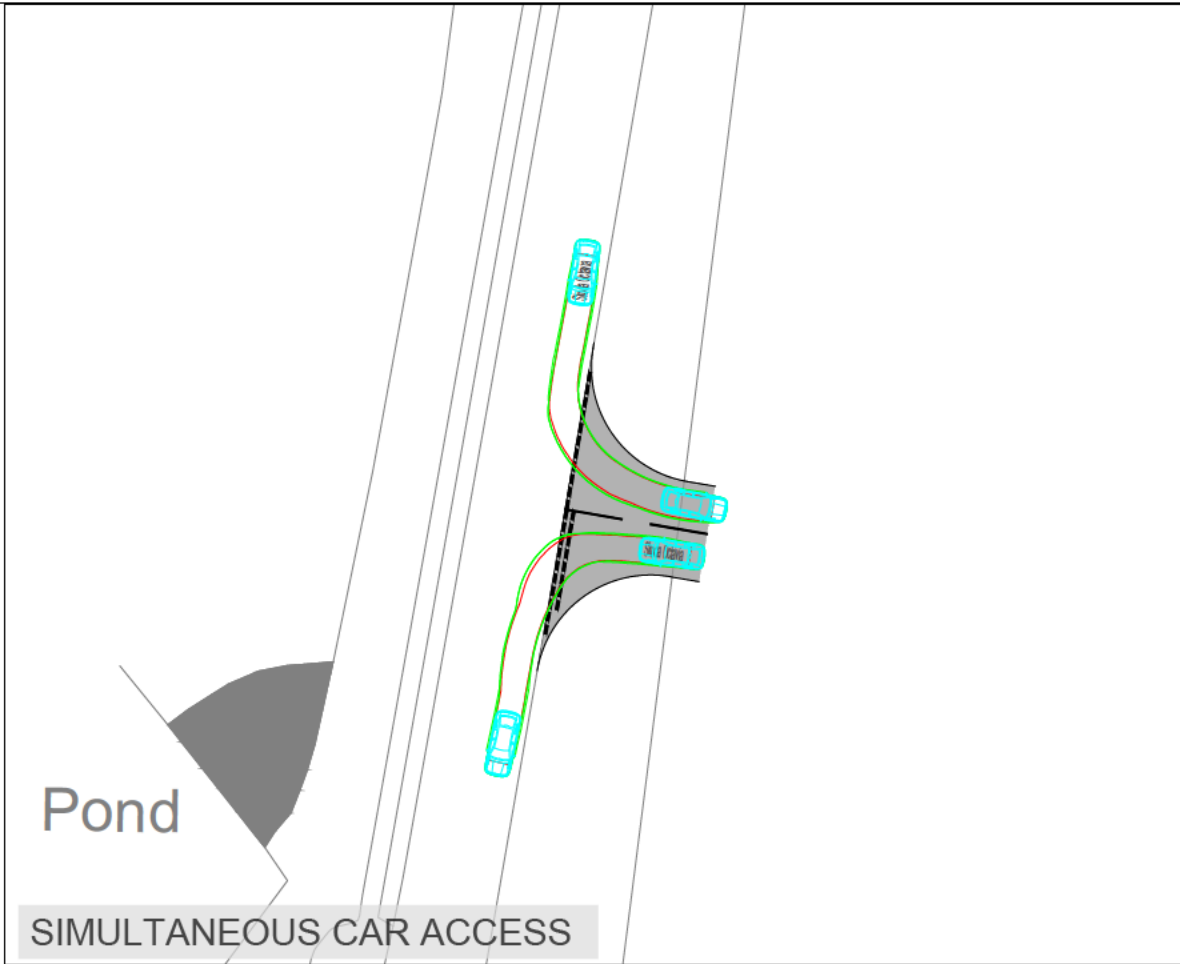
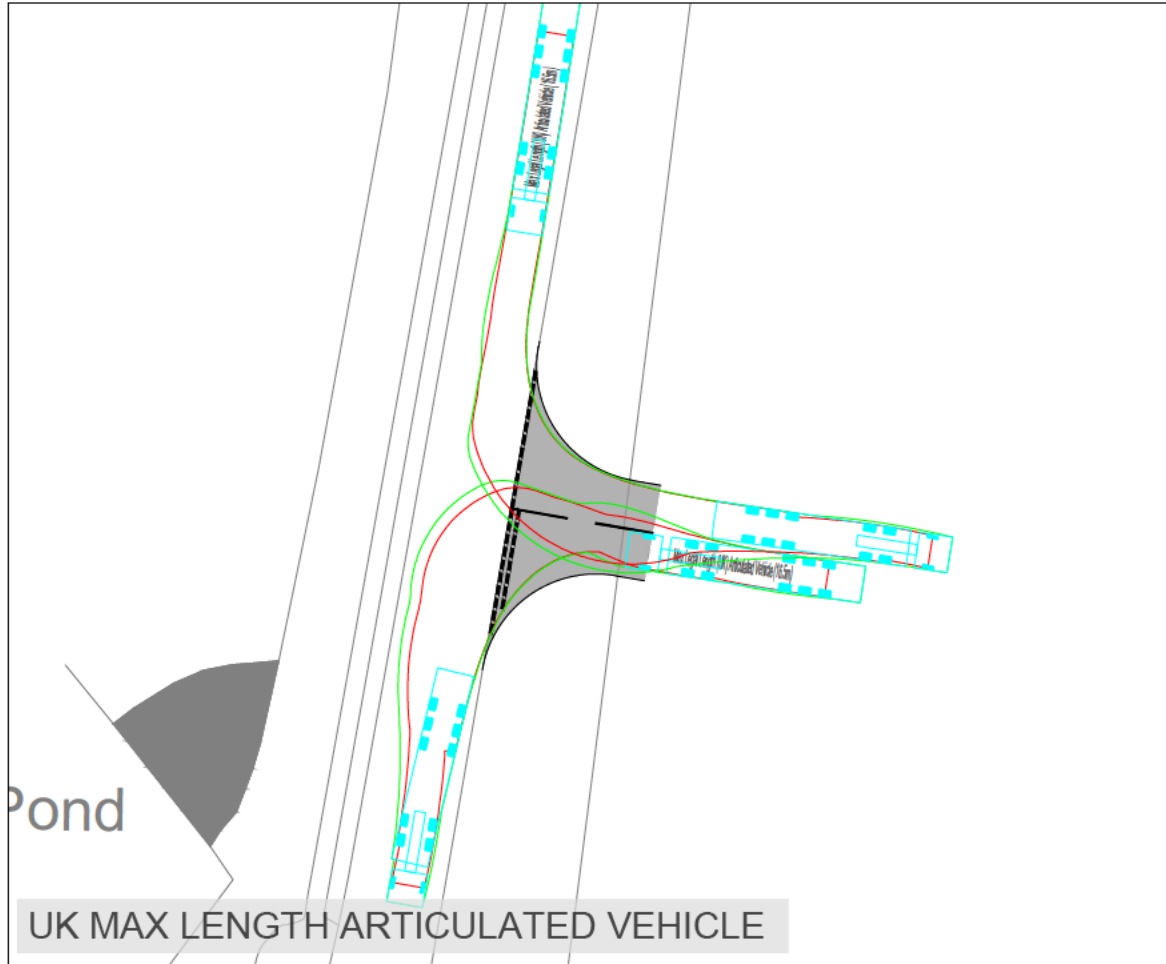
PRELIMINARY

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P01	FIRST ISSUE	20.02.2026	NPE	WJF
Rev	Description	Date	By	App'd
Date Created	Drawn By	Approved By	Suitability Code	
19.02.2026	NPE	WJF	-	
PBA Project Number		Scale	(AT A3)	
1007.0031		1:1000		
PBA Drawing No:			Revision	
1077.0031-0004			P01	

Project Name LAND SOUTH OF M45 DUNCHURCH, RUGBY	Title POTENTIAL ACCESS TOFT HILL	paulbasham associates Paul Basham Associates Ltd Milton Hall, Ely Road, Milton, Cambridge, CB24 6WZ 01223 253699 info@paulbashamassociates.com www.paulbashamassociates.com	Client PRIVATE CLIENT
Project Phase PRELIMINARY			

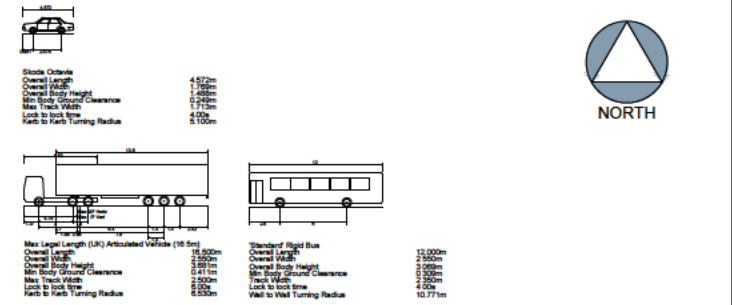


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VEHICLE PROFILES:



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Project Name LAND SOUTH OF M45 DUNCHURCH, RUGBY		Title TOFT HILL SWEPT PATH ANALYSIS	paulbasham associates Paul Basham Associates Ltd Milton Hall, Ely Road, Milton, Cambridge, CB24 6WZ 01223 253699 info@paulbashamassociates.com www.paulbashamassociates.com	Client PRIVATE CLIENT		Date Created 19.02.2026	Drawn By NPE	Approved By WJF	Suitability Code -
Project Phase PRELIMINARY				PBA Project Number 1007.0031	Scale 1:500 (AT A3)				
PBA Drawing No: 1077.0031-0005					Revision P01				