Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	**Ref:** **(For official use only)**

Name of the Local Plan to which this representation relates: Rugby Borough Council Proposed Submission Local Plan

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

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*		2. Agent's Details (if applicable)
**If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*		
Title	Mr	Mr
First Name	John	Ross
Last Name	Tarrant	Mayger
Job Title (where relevant)		Senior Associate Planner
Organisation (where relevant)		[redacted]
Address Line 1		[redacted]
Line 2		[redacted]
Line 3		[redacted]
Line 4		[redacted]
Post Code		[redacted]
Telephone Number		[redacted]
E-mail Address (where relevant)		[redacted]

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.

Minimum Housing Need

The Planning Practice Guidance sets out how the minimum annual local housing need figure is calculated using the standard method at Paragraph: 004 Reference ID: 2a-004-20241212. Step 1 is to set the baseline which is calculated as 0.8% of existing housing stock for the area using the live tables on dwelling stock (Table 125). For Rugby the latest figure is 52,209 (2024). Therefore, the baseline is 52209 x 0.008 which equates to 417.672 dwellings per annum.

Step 2 is an adjustment to take account of affordability. The affordability data used is the median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level (Table 5c). The mean average affordability over the five most recent years for Rugby is 7.75. The adjustment factor is therefore as follows:

$((7.75-5)/5) \times 0.95 + 1 = 1.5225$

The minimum annual local housing need figure = housing stock baseline x adjustment factor. Therefore, the minimum annual local housing need figure is 636 dwellings per annum (rounded up from 635.90562). This is in line with Paragraph 1.20.

Over the 17-year plan period (2025-2042) the housing requirement is therefore 10,812 dwellings. Policy S2 makes provision for 10,812 dwellings in addition to an 8.4% buffer. The Plan therefore provides a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is therefore sound in this regard with respect to Paragraph 36(a) in the NPPF.

Affordable Housing Need

Turning to 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 would likely be reduced by the developer 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 C4 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 onto 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.

<u>Minimum Housing Need Buffer</u>

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 trajectory86 , 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 shortall 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]. Growth Scenarios 3 to 8 in the Sustainability Appraisal would all provide a more suitable supply buffer ranging from 13%-24%.

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.

<u>Small Windfall Sites</u>

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 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), nonallocated 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 the 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).

<u>Plan Period</u>

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 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.

With the above considered, the plan period is not consistent with Paragraph 22 in the NPPF and the Plan is therefore not sound pursuant to Paragraph 36(d).

(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 identified shortfall of 170 affordable homes over the plan period, the housing provision would need to be increased by 567 dwellings over the plan period. This would deliver 170 affordable homes at a 30% affordable housing provision. This would require additional sites to be allocated at 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 within years 2035-2042.

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), nonallocated 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 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 2025-2043/44 to ensure that the plan period 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.

(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)	X	**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.*

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-notices

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 support the provision of new homes being focused on Rugby as the only town and most sustainable settlement within the Borough.

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). There are number of sustainable sites, particularly around the southern edge of the Rugby urban area that would be more sustainable and would have not have required such a significant release of land from the Green Belt. This includes for example HELAA sites 91, 52, 51 and previous draft allocations at Regulation 18 including Land off Barby Lane and East of Kilsby Lane. Land off Barby Lane, East of Kilsby Lane and Land at Ashlawn House could together remove the need to release Green Belt land for ~500 dwellings. On this basis it is not considered that exceptional circumstances have been justified to support the extent of Green Belt release in accordance with Paragraph 146 in the NPPF which states that "***Exceptional circumstances in this context include**, but are not limited to, instances where an authority **cannot meet its identified need for homes**, commercial or other development **through other means***." [Emphasis added]

The evidence contains 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 a

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.

<u>Suitability of Site Allocations</u>

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 dense given the sites 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).

(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 weaking 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).

In order to account for the removal of the above sites from Policy S6 alternative sites will need to be allocated for residential development. Such allocations should be directed toward the most sustainable settlements in the Borough that would not require the release of Green Belt land.

This should include the allocation of Ashlawn House, Ashlawn Road, Rugby (Site ID: 52) which is currently subject to a live planning application for up to 90 dwellings pursuant to LPA reference R25/1041. Policy Officers are requested to review all of the submission documents submitted with this planning application however the Indicative Masterplan and Planning Statement have been submitted alongside these representations for reference.

The Suitability Commentary for Ashlawn House within the HELAA stated as follows:

"*Partially within potential GI corridor. Line of trees covered by TPO's within and adjacent western part of site. Site abuts an area of Priority Habitat - Deciduous woodland to its south/west. An appropriate buffer may be required to mitigate any impacts. Locationally inappropriate, causing sustainability concerns despite lying adjacent site that has extant planning permission for residential. Not considered suitable for residential as a stand-alone site but also could be considered as part of a strategic site with larger adjoining land parcels*."

Taking these points in turn, a Tree Preservation Order for the site was submitted with our Regulation 18 Preferred Options representations. The TPO's are all situated on the sites Western boundary at Inwoods House (outside of the Applicants landownership). It should be noted that an Arboricultural Impact Assessment has been submitted alongside

LPA reference R25/1041 which demonstrates that the TPO trees and all but one tree on-site can be retained. A copy of the Arboricultural Impact Assessment is submitted with these representations. A Landscape Visual Impact Assessment has also been undertaken as part of LPA reference R25/1041 which concludes that "*Application Site and wider area have a good ability to tolerate the nature/scale of the development without any adverse effect on the local or national landscape character*". A copy of the Landscape Visual Impact Assessment is submitted with these representations.

With respect to the potential GI corridor and areas of Priority Habitat, an Ecological Impact Assessment (EcIA) has been submitted with LPA reference R25/1041 alongside a Biodiversity Net Gain Assessment. A copy of these documents is submitted with these representations. The proposed Biodiversity Net Gain strategy has been designed to take the opportunity to protect, restore and enhance the existing Potential Green Infrastructure Corridor. It should be noted that Warwickshire County Council Ecology have not objected to LPA reference R25/104.

The site lies immediately to the South of part of the DS3.4 South West Rugby allocation (Ashlawn Gardens) which is now being built out and comprises circa 860 dwellings. The site therefore adjoins the existing built-up area to Rugby and the Regulation 19 Draft Plan proposes extending the settlement boundary to Ashlawn Road formalising the extent of the urban edge. As referenced in the Suitability Considerations in the HELAA Site Proformas, the site is also adjacent to the Former Inwoods House which has planning consent for 25 dwellings pursuant to LPA reference R23/0491. With regard to sustainability the Officers Report (submitted alongside these comments) details that "*The application site is adjacent to the David Wilson development, Ashlawn Gardens, which is currently been constructed (circa 860 dwellings), and will form the new urban edge boundary, to the north of the application site and adjacent to the other side of the Ashlawn Road.* ***The Ashlawn Road provides vehicle access, a cycle network and provides safe pedestrian routes to include pavements and a traffic controlled pedestrian crossing, to the urban area, the most sustainable location within the Borough, providing the best access to a range of services and facilities****. Which would provide moderate weight in favour of the proposal*." [Emphasis added].

The site is within walking/cycling distance of a range of local services and facilities within the Rugby urban area including *inter alia* Rugby Free Secondary School, Quest Academy, Rokeby Primary School, Hospital of St Cross, Rugby High School and the Sainsbury's on Dunchurch Road, all of which can be accessed through the Ashlawn Gardens development. The site also benefits from being within walking and cycling distance of Dunchurch which as set out in the Rural Sustainability Study is the most sustainable Main Rural Settlement providing further access to local services and facilities including *inter alia*; Little Grange Nursery, Dunchurch Sportsfield & Village Hall, Dunchurch Infant School and Nursery, Dunchurch Surgery, Bilton Grange Preparatory School, Dunchurch Boughton Church of England Infant Academy and Nursery, Dunchurch Pharmacy and several pubs and restaurants.

It should be noted that Warwickshire County Council Highways have commented on LPA reference R25/1041 and have confirmed that "*This site is* ***well-connected to the existing***

walking and cycling network in Rugby, and local schools and amenities are within comfortable walking and cycling distances." [Emphasis added] Rugbys Housing department have likewise stated that they support affordable, accessible and specialist housing provision in this location.

Given the above, it is considered that the Land at Ashlawn House is a sustainable location for a standalone residential development. The 'Justification for discounting' adds "*Settlement character piecemeal, incongruous development separate from settlement edge*". As detailed above, the site is not separate from the settlement edge, it is a matter of fact that it directly adjoins the existing built-up area to Rugby and the proposed settlement boundary within the Regulation 19 Draft Plan. Furthermore, development would not be incongruous, the site is bound to the North by residential development at Ashlawn Gardens and soon to be bound to the West by residential development at the Former Inwoods House. If allocated for development, development would not encroach any further to the East than Ashlawn Gardens and no further to the south than that consented under Local Authority reference R23/0491. As such it would be commensurate to the pattern of development and would 'round off' this part of the urban fringe.

(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)	X	**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 discuss an alternative site allocation at Ashlawn House, Ashlawn Road, Rugby (Site ID: 52) which is currently subject to a live planning application for up to 90 dwellings pursuant to LPA reference R25/1041.

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.*

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	EN3 Rainsbrook Valley landscape of elevated sensitivity	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.

Whilst the inclusion of Rainsbrook Valley landscape of elevated sensitivity is supported in principle, it is considered that the area defined on the Policy Map is not based on proportionate evidence and is therefore not sound pursuant to Paragraph 36(b) in the NPPF.

Paragraph 5.7 in the Draft Local Plan states that "*The findings of the Rainsbrook Valley Landscape Sensitivity Assessment (2025) justify affording this area a higher degree consideration in decision making.*" The Rainsbrook Valley Landscape Sensitivity Assessment (2025) is considered to provide a poor analysis of landscape value particularly when compared against The Rainsbrook Valley Landscape Sensitivity January 2017 undertaken by Warwickshire County Council Landscape Architects. Unlike previous landscape assessments of the Rainsbrook Valley, The Rainsbrook Valley Landscape Sensitivity Assessment (2025) does not identify defined land parcels or units (Landscape Cover Parcels) and thus provides no analysis of defined land parcels and instead looks at the sensitivity of the valley as one assessment unit. Given the purpose of the study is to support policy and decision-making, this approach is considered to be methodologically flawed and inconsistent with the Natural England Guidance contained within 'An approach to landscape sensitivity assessment – to inform spatial planning and land management.' June 2019. The approach taken to reduce the Rainsbrook Valley to a single assessment unit means The Rainsbrook Valley Landscape Sensitivity Assessment (2025) does not distinguish between different parts of the Rainsbrook Valley which have varying characteristics when assessing the landscape value 'factors' and as such does not provide an accurate assessment of landscape value at a smaller defined land parcel scale.

It should also be noted that Landscape Sensitivity Assessments were undertaken separately from the Rainsbrook Valley Landscape Sensitivity Assessment for individual sites submitted to the Call for Sites. The 2025 Study makes no reference to these in the Planning policy and guidance and these assessments could have been used to inform an assessment of defined land parcels.

As a result of not analysing defined landscape parcels, almost all of the Rainsbrook Valley has been identified as high sensitivity and in some cases previously identified Landscape Cover Parcels have had their sensitivity increased from high-medium to high, when compared to the previous 2017 study, despite significant urbanising factors on those parcels which should reduce their sensitivity. Several examples are identified in the table below:

Site/2017 Zone	Sensitivity (2017 Study)	Sensitivity (2025 Study)	Comments	Conclusion
Site of Former Inwoods House / 17h	High-Medium	High	Since 2017 planning permission has been granted for 25 dwellings pursuant to LPA reference R23/0491 and work on site had begun at the time of the 2025 study. The 2025 study makes no reference to Inwoods House however this clearly reduces the sites contribution to landscape value across all landscape value factors.	Sensitivity should be reduced to low
Ashlawn House / 17h	High-Medium	High	Since 2017, 860 dwellings have been constructed as part of the Ashlawn Gardens development on the North side of Ashlawn Road and, as above, 25 dwellings are under construction immediately to the West. The 2025 Study makes no reference to Ashlawn Gardens. These developments have had a significant urbanising presence on the site and reduce the sites contribution to landscape value namely across the two perceptual factors.	Sensitivity should be reduced to medium. The rear of the site in 14d on the 2017 Study should remain high
Gorse Farm Close / 17h	High-Medium	High-Medium	Since 2017 planning permission was granted for 10 dwellings pursuant to LPA reference R17/0455. These dwellings have subsequently been built out. The 2025 Study	Sensitivity should be reduced to low

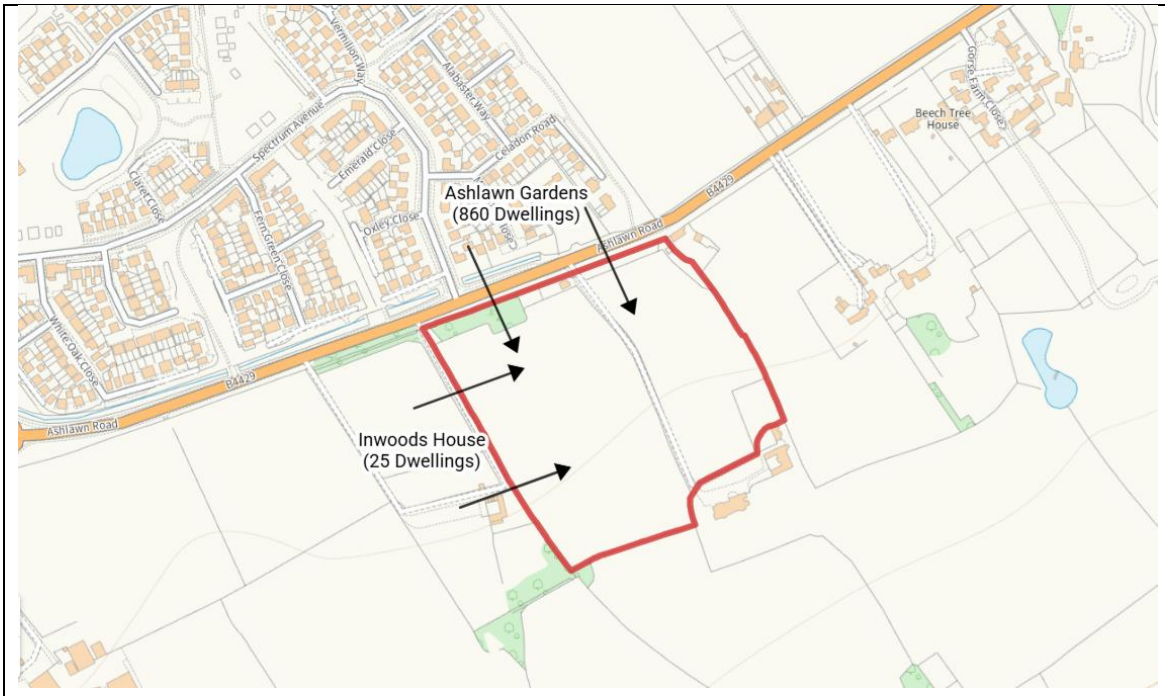
			makes no reference to Gorse Farm.	

Neither Policy EN3 nor The Rainsbrook Valley Landscape Sensitivity Assessment (2025) clarify whether the Rainsbrook Valley is to be designated as a valued landscape as per Paragraph 187(a) in the NPPF. This clarification is important for two reasons, first as noted in The Rainsbrook Valley Landscape Sensitivity Assessment (2025) the Inspectorate previously concluded in Appeal Reference APP/E3715/W/16/3158785 that the Rainsbrook Valley was not a valued landscape stating *"In my judgement I would **not describe the site or part of it as lying within a valued landscape**."* [Emphasis added]. Secondly, whilst this Local Plan will be examined under the December 2024 NPPF the Draft NPPF 2025 consultation replaces the concept of valued landscapes with DM Policy N1(a) which instead states *"N1: Identifying environmental opportunities and safeguards*

1. Development plans should safeguard and enhance the natural environment, and reflect the wider benefits from natural capital and ecosystem services, by using Local Nature Recovery Strategies, Protected Landscape Management Plans, River Basin Management Plans, National Forest Strategies, Community Forest Plans and other relevant evidence at the most appropriate level to:

a. Set out the hierarchy of international, national and locally designated sites and areas of importance for their landscape, geological (including soil) or biodiversity value in the plan area, and identify other features which require particular consideration in managing development due to their environmental value such as chalk streams;"

Turning specifically to Ashlawn House, as set out in the table above the 2025 Study increases the sites landscape value from high-medium to high despite significant urbanising influences adjacent to the site since 2017. As set out, this includes the development of 860 dwellings at Ashlawn Gardens as part of the Rugby South West SUE immediately to the north and 25 dwellings which are currently under construction immediately to the west. Both of these developments exert a significant urban influence and weaken the contribution the northern part of the site makes with respect to both the Perceptual (Scenic) and Perceptual (Wildness and Tranquillity) landscape value factors which isn't reflected in the 2025 Study. It should be noted that the landscape sensitivity map provided on page 65 of the Study does not use the latest Ordnance Survey base mapping and therefore does not show the extent of the Ashlawn Gardens development.



Ashlawn House is referenced once within the 2025 Study which states the following "*The other historic designed landscape is associated to Ashlawn House, off Ashlawn Road, and south of the Ashlawn Water tower. The grandiose 19th century house and parkland garden remain, albeit with* ***the latter's character somewhat eroded through incremental parkland tree loss***." [Emphasis added]. It should be noted that the character has been further eroded by livestock grazing over a number of years. Both the incremental parkland tree loss and livestock grazing have reduced the contribution the site makes to the cultural heritage factor.

It should also be emphasised that the topography reduces the visual profile of the northern part of the site across the valley significantly and the planting along the northern boundary provides a significant landscape buffer. Indeed, it is recognised in the 2025 Study that "*There will be localised areas of lower or moderate susceptibility, including specific parcels where both:* ***topography might reduce the visual profile across the wider valley****; and where* ***existing*** *or enhanced* ***vegetation might provide screening****. Such areas are* ***most likely located beyond the northern ridge line and abutting Ashlawn Road***" [Emphasis added]. Despite the recognition that specific parcels would have a lower or moderate susceptibility, Ashlawn House is determined to provide high susceptibility in the matrix. Again this highlights the need for the 2025 Study to have assessed defined land parcels and not one assessment unit.

Taking the above into account Ashlawn House is considered to have moderate/low sensitivity and good/ordinary value which would, taking the most conservative analysis, result in a medium sensitivity.

A Landscape Visual Impact Assessment for the land at Ashlawn House has been carried out to support LPA reference R25/1041 and is submitted alongside these representations. It concludes that "*The Application Site has a distinctive parkland setting and is assessed as of* ***moderate landscape value and largely low sensitivity****. A large area*

of the site to the south, part of which is assessed as high sensitivity due to views over the Rains Brook Valley, will be exclusively green field comprising a SUDs pond and tree planting, creating new habitats that will replicate the parkland feel that gives the Application Site its quality and value.

The site has a ***high level of containment*** *and there are good opportunities for mitigation and enhancement. The* ***number of visual receptors is largely limited by the boundary vegetation, woodlands, hedgerows and tree belts in the landscape and built form, particularly from the north and west****. Receptors comprise principally of pedestrians and residents in close proximity to the site boundary to the north and east.*

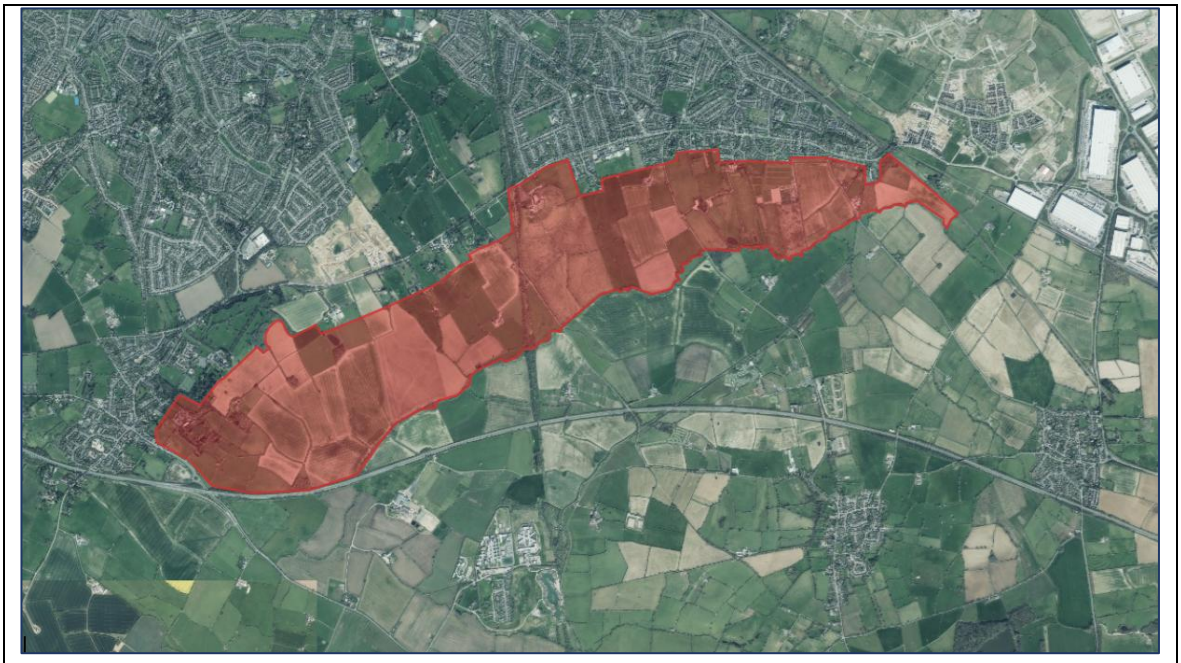
It is considered that the ***Application Site and wider area have a good ability to tolerate the nature/scale of the development without any adverse effect on the local or national landscape character****. The proposals conform to local and national policies and in conclusion this assessment does not consider that there are any unacceptable or overriding landscape or visual effects that should preclude the proposed development*" [Emphasis added].

As an aside, it should be noted that neither Ashlawn House, Ashlawn Road, Rugby nor Gorse Farm, Ashlawn Road, Rugby have been included within either of the Landscape Sensitivity Assessments. This document should be updated to include a landscape sensitivity assessment of the site. This was noted in our representations made to the Regulation 18 Preferred Options consultation yet has not been updated.

(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 Rainsbrook Valley landscape of elevated sensitivity area should be modified on the Policy Map to include only areas of high landscape sensitivity. To inform this modification The Rainsbrook Valley Landscape Sensitivity Assessment (2025) should be updated to include an assessment of defined land parcels. An indicative modified Rainsbrook Valley landscape of elevated sensitivity area is set out below. These modifications would ensure that the Plan is based on proportionate evidence and is sound pursuant to Paragraph 36(b) in the NPPF.



The wording at Policy EN3 should be modified to set out clearly whether the Rainsbrook Valley is a valued landscape in accordance with Paragraph 187(a) to ensure that the Plan is consistent with the NPPF and sound pursuant to Paragraph 36(d) in 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)	X	**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 examine the flawed methodology used in The Rainsbrook Valley Landscape Sensitivity Assessment (2025) for determining the extent of the Rainsbrook Valley landscape of elevated sensitivity.

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.*

Notes:

Red Line Area - 7.43 Ha

House Size	HA	Market	Total
1 Bed Flat	6	6	12
2 Bed House	10	18	28
3 Bed House	8	27	35
4 Bed House	3	9	13
Total	28	62	87

Affordable Units

M4(3) Accessible Units

M4(3) Accessible & Sheltered and Extra Care Units

Self-Build and Custom Build Units



N

REVISION	DATE	AMENDMENT
C	18/02/2026	SuDS POND AMENDED
B	2/2/2026	PLAN UPDATED AROUND TREES
A	9/9/2025	PLAN UPDATED TO REFLECT BADGER BUFFER ZONE

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SCHEME:

LAND SOUTH OF ASHLAWN ROAD, ASHLAWN HOUSE, RUGBY.CV22 5QS

TITLE:

POTENTIAL LAYOUT

SCALE	PAPER SIZE:	DRAWN BY	CHECKED BY
1:1250	A2L	CW 7/3/2025	RM 7/3/2025

CLIENT NO.: TAR1262

DRAWING No.: 211226-P-00-100 C

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MAYDENCROFT

Ashlawn House Biodiversity Net Gain Statement

24th February 2026

Submission details

Date: 24th February 2026

Development Site Address: Ashlawn Road, Rugby, Warwickshire, England, CV22 5PS

Development description: The proposed development is for a small residential site with associated greenspaces and landscaping.

Developer details

Applicant name: Ashlawn Investment Limited – C/O Sworders

Company name: Sworders

Address: The Gatehouse, Hadham Hall, Little Hadham, Ware, Herts. SG11 2EB

Email address: Ross.Mayger@sworders.com

Telephone number: [redacted]

Responsible person details

Name: [redacted]

Company name: [redacted]

Address: [redacted]

Email address: [redacted]

Telephone number: [redacted]

Qualifications and competency: [redacted]

Biodiversity Net Gain Baseline

Is the relevant date for the pre-development biodiversity value the same date as the planning application? Yes

Is there any evidence of habitat degradation that has taken place on site since January 2020? Yes, some trees have been removed prior to this application. These have been included within the assessment.

Does the site have any irreplaceable habitats? No

Has the statutory biodiversity metric tool been used? Yes – Ashlawn House Metric

Biodiversity net gain post development

Confirm you have added post development details to the metric tool submitted with this application: Yes

Will the development have any negative impact on irreplaceable habitats? No

How will the 10% net gain be achieved?

A 10% net gain in biodiversity units is considered likely to be achieved on-site based on the current plans. However, the landowner has identified an alternative off-site area for Biodiversity Net Gain delivery, should it be required.

The habitats present on-site include modified grassland, individual trees and native hedgerows. While the site does not contain any irreplaceable habitats, it does include priority habitats or habitats identified as strategically significant in local planning documents in the form of hedgerows.

The proposed development will result in the loss of all modified grassland on-site to facilitate the development. The land will be repurposed for residential development, play spaces, Sustainable Urban Drainage Systems (SuDS), and habitat enhancement.

The baseline value for the 7.43 hectares of modified grassland with individual trees is 26.73 habitat units, the hedgerow baseline is 1.03 hedgerow units. Of the total site area, 1.9843ha is comprised of new housing, parking and paths, pavements and roadways. 1.8914ha will be comprised of front and rear gardens alongside streetscape landscaping. A small area of 0.2681ha is allocated for an attenuation pond and two very small areas are allocated for play spaces (0.011 / 0.0415ha). The remaining 3.13ha will be comprised of natural/semi-natural green spaces, wildlife areas and amenity green spaces. Alongside this, 168 trees will be planted. In addition, a new hedgerow of 0.04km will be planted on Site. Further trees will be planted on Site to improve landscaping and for public benefit. These have not been included in the BNG at this stage as it is not required.

The proposed habitat creation delivers a biodiversity unit gain of 3.40 habitat units and 0.19 hedgerow units, which equates to a 12.70% increase in habitat units and an 18.17% increase in hedgerow units. The proposed scheme satisfies all trading rules.

In conclusion, a 10% net gain in both habitat and hedgerow units appears feasible on-site, even allowing for minor changes to the current layout or metric. If this is not achievable, the landowner has made provisions for off-site habitat creation or enhancement to meet BNG requirements.

Declaration

By signing this declaration, I confirm that the information I have given is complete and correct.

[redacted]

Position: Principal Ecologist

Company: Maydencroft Limited

Signature: [redacted]

Date: **24.02.26**

[redacted]

Head Office: [redacted]
Email: [redacted]

Landscape and Visual Impact Assessment

Proposed Residential Scheme on Land off Ashlawn Road, Rugby

September 2025

1 INTRODUCTION

1.1 Scope

1.1.1 This report assesses the landscape and visual impacts (LVIA) associated with the construction of a proposed residential development (hereafter referred to as the proposed development) on 7 hectares located on the southern extent of the residential area of Rugby.

1.1.2 All work is undertaken in compliance with the Landscape Institute's Code of Standards of Conduct and Practice for Landscape Professionals.

1.2 Establishing the Study Area

1.2.1 The Study Area includes the Application Site itself and the wider landscape where the proposed development may have an influence either directly or indirectly. The visual assessment is approximately 2.5km from the Application Site although references to the wider area will be made in relation to landscape character and local and national planning policies. This has been deemed appropriate following desk research, site surveys and a review of the Zone of Theoretical Visibility (ZTV), to identify appropriate and representative viewpoints. **See Appendix 1**.

1.3 Proposed Development Summary

1.3.1 The proposed development comprises the erection of up to 90 residential dwellings (use Class C3) including 28 affordable homes, 9 self-build/custom build homes, 9 accessible homes to M4(3) standards and 6 specialist homes. The development has been landscape-led with an emphasis on tree retention, new tree planting and enhancement of grasslands in order to retain the site's existing parkland character.

1.4 Methodology

Guidance, References and Legislation

- The overall approach and methodology are based on the Guidelines for Landscape and Visual Impact Assessment (3rd Edition) by The Landscape Institute and the Institute of Environmental Management & Assessment (GLVIA3) with Notes and Clarifications – LITGN-2024-01 published in August 2024. Other guidance is found within:
    - Landscape Institute Technical Guidance Note 06/19: Visual Representation of Development Proposals (2019), and
    - Landscape Institute Technical Guidance Note 2/19: Residential Visual Amenity Assessment (RVAA).

1.4.1 There are a number of published guidance documents including Development Plans, which include planning designations relevant to the Study Area as listed below:

- National Planning Policy Framework (December 2024), and relevant PPGs including Biodiversity net gain;

- Rugby Borough Local Plan 2011-2031;
- Draft Rugby Borough Local Plan Preferred Option Consultation Document, March 2025;
- Local Plan Review – Preferred Option public consultation: evidence base:
    - Landscape Character Assessment, Rugby Borough Council, January 2025;
    - Housing and Economic Land Availability Assessment (HELAA), Rugby Borough Council, March 2025; Stage 2 Site Assessment Report, March 2025;
    - Strategic Housing Land Availability Assessment (SHLAA) Update, Rugby Borough Council, March 2025;
- Warwickshire County Council, Warwickshire Landscape Guidelines, Assessment and Strategies: Dunsmore – High Cross Plateau – Mease Lowlands, 1993; https://api.warwickshire.gov.uk/documents/WCCC-372917633-2599
- Natural England, National Character Areas, Character Area 96 - Dunsmore and Feldon;
- Landscape Assessment of the Borough of Rugby, Sensitivity and Condition Study, Warwickshire County Council, 2006;
- South West Rugby Masterplan Supplementary Planning Document (SPD), 11 December 2024, this replaces the original South West Rugby Masterplan SPD which was adopted in 17 June 2021 and has since been revoked;
- Rainsbrook Valley Landscape Sensitivity Study, Final amendments March 2017, WCC Landscape Architects;
- Rugby Borough Council, Green Infrastructure Study, Final Report, Entec, June 2009;
- AIA, Greensted Arboricultural Consultancy Ltd, July 2025;

1.4.2 All feasible and reasonable attempts have been made to ensure that the information provided by a range of public sector institutions and presented in this LVIA is accurate and up-to-date.

Summary of LVIA Objectives and Key Tasks

1.4.3 The objective of the LVIA is to evaluate the likely level of effect on the landscape character and visual amenity to the application site and Study Area to assist the determining authority in considering the acceptability of the proposed development. It is based on the interpretation of the physical and aesthetic characteristics following criteria and terminology partially drawn from *Principles and Overview of Processes* (Chapter 3) within the GLVIA. The LVIA focuses on key effects and issues as follows:

- The effect of the proposed development upon the landscape resource;
- The effect of the proposed development on the perception of the landscape; and
- The effects arising from the proposed development on visual amenity.

1.4.4 The LVIA methodology can be summarised as undertaking the following key tasks:-

- Site Visits on 1st August 2025.

- Assessing the baseline Landscape Setting and Conditions;
- Evaluation of key components of the proposed development based on site layouts, plans and elevations prepared by members of the design team;
- Consideration of Mitigation and Enhancement Measures;
- Assessment of Landscape Effects;
- Assessment of Visual Effects; and
- Summary of level of effect on the Landscape and Visual Amenity.

Definition of Landscape and Visual Effects

1.4.5 For the purpose of this assessment, this chapter adopts the definition of landscape presented in the European Landscape Convention and refers equally to areas of rural countryside and urban built-up areas (typically historically referred to as 'townscape'). The definition of landscape is:-

- '*An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.*'
- The assessment process helps identify the effects of the proposed development on views and on the landscape.

Landscape and Visual Effects – Distinctions

1.4.6 Landscape and visual effects can be quite different and are assessed separately; although the process is similar and effects ultimately arise as a result of combined impacts upon the landscape and visual amenity of a proposed development. Developments can have significant visual effects but no impact on landscape/townscape character and some can be vice versa.

1.4.7 Landscape Effects are the effects on landscape as a resource and defined as follows:

> *"An assessment of landscape effects deals with the effects of change and development on landscape as a resource. The concern ... is with how the proposal will affect the elements that make up the landscape, the aesthetic and perceptual aspects of the landscape and its distinctive character. ... The area of landscape that should be covered in assessing landscape effects should include the site itself and the full extent of the wider landscape around it which the proposed development may influence in a significant manner."* (GLVIA3 paragraphs 5.1 and 5.2)

1.4.8 Visual Effects are the effects on Views and Visual Amenity and summarised as follows:-

> "*…establish the area in which the development may be visible, the different groups of people who may experience views of the development, the places where they will be affected and the nature of the views and visual amenity at those points."* (GLVIA3 paragraph 3.13)

Baseline Landscape Assessment Methodology

1.4.9 The baseline landscape assessment identifies and records the character of the landscape and the key elements, features and aesthetic or perceptual factors which contribute to it. The

baseline landscape studies extend to include the wider context into which the proposed development will be introduced. It involves a desk-top analysis and review of material including:

- National, regional and local Landscape Character Assessments;
- Existing National, Regional and Local Designations and relevant Planning Policy;
- Current and historical Ordinance Survey Maps;
- Aerial Photographs via Bing, Google, Open Street Map;
- Relevant environment / ecology, cultural heritage, historical and archaeology evidence.

1.4.10 As part of the baseline assessment, the combination of desk-top analysis and site survey allows judgement to be made on the key elements that contribute to the landscape character and its wider condition (positive, neutral or negative) and wider value and sensitivity.

- Landscape value, quality and sensitivity is affected by factors including:
  - whether the resource is common or rare;
  - whether it is considered to be of local, regional, national or global importance;
  - whether there are any statutory or regulatory limitations / requirements relating to the resource;
  - the quality of the resource;
  - the maturity of the resource, and
  - the ability of the resource to accommodate changes.

1.4.11 Guidance as to the assessment of landscape value and sensitivity is given in **Table 1**.

Table 1 Determination of Landscape Value and Sensitivity

Terminology	Definition	Summary
Highest Value Landscape	Nationally or regionally important landscape with high quality, highly valued rare or unusual features recognised by designation such as AONB's, Areas of Scenic Value or World Heritage Sites. Distinct landscapes that exhibit a strong structure and character with valued features that combine to give the experience of scenic quality, tranquillity, rarity and harmony. Negligible pedestrian and traffic conflict.	Very vulnerable to change. High Sensitivity
Very Attractive Landscape	Locally or regionally designated landscapes – including Local Landscape Policy Areas - or areas where local evidence indicated as being more valued than the surrounding area.	Some ability to absorb change in some situations without having significant effects.

		Medium Sensitivity
Medium Landscape	"Everyday" or community / undesignated landscapes which may be appreciated by the local community but has no or little wider recognition of its value	Able to accommodate change without significant effects. Low Sensitivity
Poor Landscape	Low importance and degraded landscapes with few redeeming features. No evidence of being valued by the community	Damaged landscapes very capable of accommodating change. Very Low Sensitivity

1.4.12 This report considers how the proposed development would impact on existing landscape elements and resources which are normally associated with the direct effects on the application site itself. The indirect impacts of the proposed development on the wider landscape are assessed with reference to landscape types or character areas.

1.4.13 This is affected by factors including:

- the physical extent and nature of the key elements that make up the proposal;
- the landscape context of these effects and
- the time-scale of impact, such as whether it is temporary (short, medium or long term), permanent with reversible potentials, or irreversibly permanent. **See Table 2.**

Table 2 Magnitude Criteria for Landscape Character Effects

Terminology	Definition
Substantial	Total loss or major alteration to key elements / features / characteristics of the baseline (i.e. pre-development) landscape and /or introduction of elements considered to be totally dominant when set within the attributes of the receiving landscape.
Moderate	Partial loss or alteration to one or more key elements / features / characteristics of the baseline (i.e. pre-development) landscape or view and /or introduction of elements that may be prominent but may not necessarily be considered to be substantially uncharacteristic when set within the attributes of the receiving landscape.
Slight	Minor loss or alteration to one or more key elements / features / characteristics of the baseline (i.e. pre-development) landscape or view and /or introduction of elements that may not be uncharacteristic when set within the attributes of the receiving landscape.
Negligible	Very minor loss or alteration to one or more key elements / features / characteristics of the baseline (i.e. pre-development) landscape or view

	and /or introduction of elements that are not uncharacteristic with the surrounding landscape - approximating the 'no change' situation.

1.4.14 In those instances where there would be no change to the landscape, the magnitude is recorded as 'zero' and the level of effect as 'no change'.

Baseline Visual Amenity Assessment

1.4.15 Visual Effects are concerned wholly with the effect of the development on views, along with the general visual amenity and are defined by the Landscape Institute in GLVIA3, Paragraph 6.1 which states:-

> *"An assessment of visual effects deals with the effects of change and development on views available to people and their visual amenity. The concern here is with assessing how the surroundings of individuals or groups of people may be specifically affected by changes in the context and character of views as a result of the change or loss of existing elements of the landscape and/or introduction of new elements."*

1.4.16 The baseline studies establish the area from which the proposed development may potentially be visible and the different groups of people ("visual receptors") who may experience views or changes to view context.

1.4.17 Viewpoints are usually identified in locations that are publicly accessible, such as roads, public realm / domain areas, footpaths or publicly accessible heritage sites. Selection is also based on a determination of the extent of visibility towards the proposed development site or from locations where there may be significant numbers of visual receptors who will see the proposed development e.g. tourist sites. Viewpoints are chosen to be representative, specific or illustrative and cover as much of the study area as reasonable or necessary and address all areas where there may be changes in terms of views or visual amenity.

1.4.18 Viewer sensitivity is based on the nature of the visual receptor (resident, tourist, commuter etc.) and the visual quality or value attached to a particular view. **See Table 3.**

Table 3 Viewer Sensitivity and Types

Sensitivity	Definition	Summary of Visual Receptor Type
High	Notable views of heritage assets, quality, valued or scenic landscapes. Views that may be designated or feature in guidebooks, scenic tours, associated with culture, literature and art or an important contributor to experience.	People engaged in outdoor activity whose interest is likely to be focused on the landscape or particular views. e.g. hill-walkers, tourists, scenic tours, users of public rights of way. Residents Residents / Communities living within close proximity of the proposal.

Medium	Ordinary views where the reason for visual receptor to be in the area and does not involve or depend upon an appreciation of the views of the landscape.	Outdoor activity with focus on recreation, sports or water-based activities such as golf, mountain biking, or country sports. Travellers on road and rail.
Low	Areas that may be viewed by the majority as incidental landscapes where the focus of the viewer is on their work or activity and the setting is not important to the visual amenity or quality of working life.	Landowners for proposal. Workers with employment related to construction and management / maintenance activity and likely to have a low interest or appreciation of the view.

1.4.19 The visual effects deriving from the proposed development are based on the combined judgement of the anticipated change in nature, visual amenity and duration of the particular view (magnitude) and the nature of the visual receptor (sensitivity). The magnitude and nature of visual effects are based on a number of factors including:

- Scale of change
- Contrast in terms of mass, colour, form and texture deriving from new feature(s);
- Extent of intervening vegetation (and seasonality if deciduous) or buildings and topography;
- Speed of passing visual receptor (and how long view is experienced);
- Angle and elevation of view e.g. oblique, direct, perpendicular;
- Nature of backdrop or skyline; and
- Duration of change or effect.
- Where mitigation measures are proposed or relevant, these are described as part of any judgement**. See Table 4**.

Table 4 Magnitude Criteria for Visual Effects

Magnitude	Definition
Major	A major change or obstruction of a view that may be directly visible, appearing as the dominant and contrasting feature appearing in the foreground.
Moderate	A moderate change or partial view of a new element within the view that may be readily noticeable, directly or obliquely visible including glimpsed, partly screened or intermittent views, appearing as a noticeable feature in the middle ground.
Slight	A small level of change, affecting a small part of the view that may be obliquely viewed or partly screened and/or appearing in the background

	landscape. May include moving views at speed. The proposal forms a minor component in the wider view which might be missed by the casual viewer / observer.
Negligible	The proposal is barely discernible or may be at such a distance that it is very difficult to perceive equating to a no-change situation.

Nature of Landscape and Visual Effects

1.4.20 The assessment process aims to be objective and quantify effects as far as possible. However, landscape and visual assessment has aspects of it that can be considered subjective. Magnitude of change to a view can be factually defined but any subsequent objective assessment should be based on professional training, experience, observation, evidence and informed opinion.

Table 5 Nature of Landscape and Visual Effects

Magnitude	Definition
Positive Effect	A change that improves the quality of the landscape character and fits very well with the existing setting.
Neutral	A change which does not affect the scale, landform or pattern of the landscape and maintains existing quality.
Adverse Effect	A change which reduces the quality of the landscape and cannot be fully mitigated.

Significance Criteria and Determination

1.4.21 Final judgment is made about which landscape effects are significant. Significance of an effect is determined by the combination of sensitivity of the affected receptor(s) and the predicted magnitude of change which combine to form a level of effect.

1.4.22 The assessment of likely significant environmental effects as a result of the proposed development takes into account the construction and operational phases. The duration of the effect has been assessed as either 'short-term', 'medium-term' or 'long-term'. Short-term is considered to be up to 1 year, medium-term is considered to be between 1 and 10 years and long-term is considered to be greater than 10 years. Note that this proposed development is regarded as being permanent and long-term in LVIA terms.

1.4.23 This LVIA bases 'Significance' of effects on the following definitions:-

- 'Significant' in the Oxford Dictionary 2018 is defined as 'Sufficiently great or important to be worthy of attention, noteworthy.'; and
- '*Significance' in the GLVIA guidelines 2013 is defined as 'A measure of the importance or gravity of the environmental effect, defined by significance criteria specific to the environmental topic.'*

1.4.24 Significance of visual effects is not absolute and can only be defined in relation to each development and its specific location. Usually an effect is considered 'significant' if the level of effect is 'moderate/substantial' or 'substantial'. The significance of landscape and visual effects is determined by cross-referencing sensitivity of landscape or view with the magnitude of change.

2 Baseline Conditions

2.1 The Application Site

2.1.1 The Application Site, approximately 7 hectares in size, is situated off Ashlawn Road, which serves as a ring road around the southern edge of Rugby and runs between Hillmorton and Dunchurch. It is approximately 2.7kms due south from the centre of Rugby and 3.4kms from Rugby railway station. The M45 is approximately 1.45km south. **See Figure 1**.

2.1.1 A gatehouse, The Lodge, just outside of the boundary of the Application Site, lies adjacent to the entrance to the site on Ashlawn Road. **See Photo 1**. Ashlawn Road is the only accessible boundary to the site, the west, east and south boundaries border agricultural land.

Figure 1: Site Location



Source: Google Earth Pro

Photo 1: The Lodge at the entrance to the drive to Ashlawn House



Photo 2: Ashlawn House



Figure 2: Application Site in context



Source: Google Earth Pro

2.1.2 The site comprises a tree lined private drive running in a north to south direction, dividing the site into two geometric fields excluding Ashlawn House and The Bungalow which lie to the south of the east field and are excluded from the redline boundary. **See Figure 2 and Photo 2.**

2.1.3 The site comprises a number of mature trees in improved grassland and has parkland features including the mature beech trees lining the driveway, the gatehouse and scattered mature trees in the two fields. Ashlawn House is mentioned in the Warwickshire Historic Landscape Characterisation Report as one of the smaller designed parks associated with small country houses.

2.1.4 At the time of the site visit, cows were grazing in the west field and horses in the east field. There are broadleaved, mixed and yew woodlands to the north of the site bordering Ashlawn Road and around Ashlawn House.

2.1.5 **Photo 3** is a panorama of the east field. The 3m beech hedgerow bordering the single track driveway from Ashlawn Road is just visible to the left. To the right is a picket wire fence, bordering a track to The Bungalow.

Photo 3: Panorama of east field of Application Site



2.1.6 On site there is visibility through the eastern boundary picket fence to an orchard garden adjoined to The Bungalow, which is outside of the redline boundary in close proximity to Ashlawn House. **See Photo 4.** The rest of the eastern boundary is generally bound by mature trees including the rear garden of Ashlawn Cottage which is situated on Ashlawn Road.

Photo 4: Picket fence bordering the east field beyond which is The Bungalow garden



2.1.7 The south east boundary of the Application Site is bordered by picket wire fencing and mature Tilia as indicated in **Photo 5,** which provides some visual separation from Ashlawn House. The proposed plans indicate that the southern area of the site is to be planted with trees and shrubs and a pond to increase habitats and biodiversity.

Photo 5: Southern boundary between Ashlawn House and the eastern boundary of the eastern field.



2.1.8 The site is set well back from Ashlawn Road with a 1.5m pedestrian path, grassed verge and area with a shallow ditch, dense vegetation and mature trees. This runs along the full extent of the northern boundary of the site, except for a conifer hedgerow bordering the gatehouse. The Application Site is generally well screened along Ashlawn Road, with some glimpses through gaps in vegetation particularly at the field gate to the east of the site **(see Viewpoint 2)** and the field gate to the west of the site as indicated in **Viewpoint 7**.

2.1.9 The east boundary and southern boundary border agricultural fields. The eastern boundary is more densely tree lined than the west, and has mature interspersed trees.

2.1.10 The field adjacent to the west boundary, is in the early stages of construction for a residential development of 25 no units, Inwoods Park. The boundary between this and the Application Site was originally planted with Lombardy poplars, still visible from GoogleEarth. However, there are few in evidence on the site visit and many have since been removed and/or reduced in height to accord with an arboricultural report for the new development (Application reference: R23/0491). Mitigation planting to accord with that proposed by the planting strategy of Inwoods Park will provide a measure of separation between the two developments.

2.1.11 Ashlawn House lies to the south of the east field. There are open, expansive views from the south of the site, creating a connection to the farmed land and the Rainsbrook Valley beyond as indicated in **Photo 6.**

Photo 6: Southern boundary of west field



2.2 Local Landscape Character

2.2.1 Ashlawn Road is a fast, busy road serving as a ring road around the southern fringe of Rugby. There is the consequent noise of traffic, which does, however, decrease and become less noticeable once on the site.

2.2.2 The proposed development is an extension of the existing concentrated pattern of house building on Ashlawn Gardens to the north of the Application Site, which has an allocation of 860 units, part of the South West Rugby Masterplan, extending the southerly residential area of Rugby. The new housing development comprises large, detached houses with front gardens, off-road parking and grassed verges. A swale borders the southern section of the estate between the housing and the pavement along Ashlawn Road.

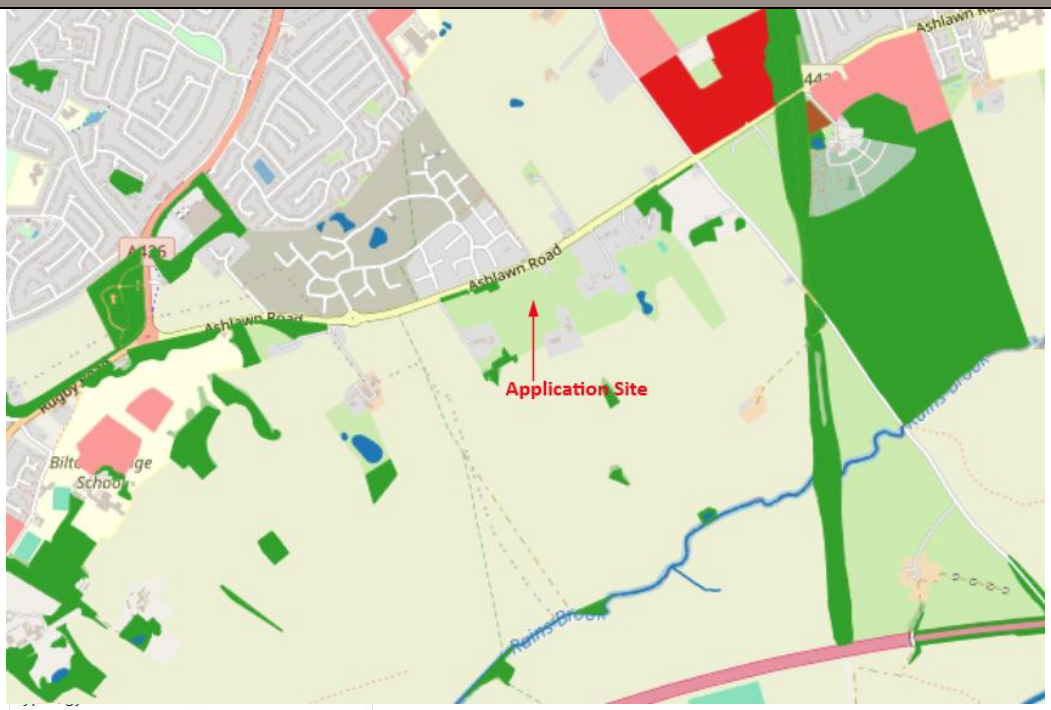
2.2.3 In addition, construction has commenced on Inwoods Park, comprising a 3.3 hectare plot offering 25 executive 2, 3,4 and 5-bedroom homes, up to 2.5 storeys in height, 10 of which run parallel with the western boundary of the Application Site. This development is not in allocated land.

2.2.4 The new build and estates in the process of construction including Ashlawn Gardens opposite the Application Site, have a variety of house types, materials and sizes. Considerations of public transport (buses), schools and healthcare services are incorporated into the South West Rugby Masterplan. A temporary bus stop has been erected on Ashlawn Road, outside the grounds of the proposed development.

2.2.5 The lands to the east and south of the Application Site are generally characterised by a mix of regular shaped, tree lined grazing fields and a few distinct established detached houses set back from the main road. There are small developments of high-end properties including Gorse Farm Close, on the Dunchurch side of Onley Lane comprising 10 executive dwellings. Further east is the Model Engineering Society, that operates the Rainsbrook Valley miniature railway and the Rugby Riding Club lying between Onley Lane and part of a disused railway network and a Local Nature Reserve, Ashlawn Cutting. In addition, Rainsbrook Cemetery and Crematorium lies at the junction of Ashlawn Road and Ashlawn Cutting and beyond this is the Rugby Diamond Wood Country Park.

2.2.6 Further afield the land use is largely agricultural, residential and recreational. **See Figure 3.**

Figure 3: Land based designations within 6 kms of the Application Site



Source: Natural England

2.2.7 In the Rugby area, agricultural land is typically classified as Grade 3, with some areas falling under subgrades 3a and 3b. Grade 3 land is considered good to moderate quality. Subgrade 3a indicates moderate to high yields of a narrow range of arable crops or moderate yields of other crops, while subgrade 3b indicates moderate yields of cereals, grass, and lower yields of other crops.

2.2.8 A familiar landmark to the north east of the Application Site is the former Ashlawn Water tower, approached off Ashlawn Road, in the agricultural open fields that lie between the residential areas of Overslade and Hillmorton. It is believed to be constructed in 1934 and has a ring of 12 reinforced concrete columns set around the edge supporting the drum holding the water.

2.2.9 Rains Brook, an 11.8km tributary formed by a series of small headwater streams, runs less than 1km south-west from the Application Site and joins the River Leam between Kites Hardwick and Woolscott.

2.2.1 Beyond the Application Site to the south of Rugby, is a parkland landscape with a scattered

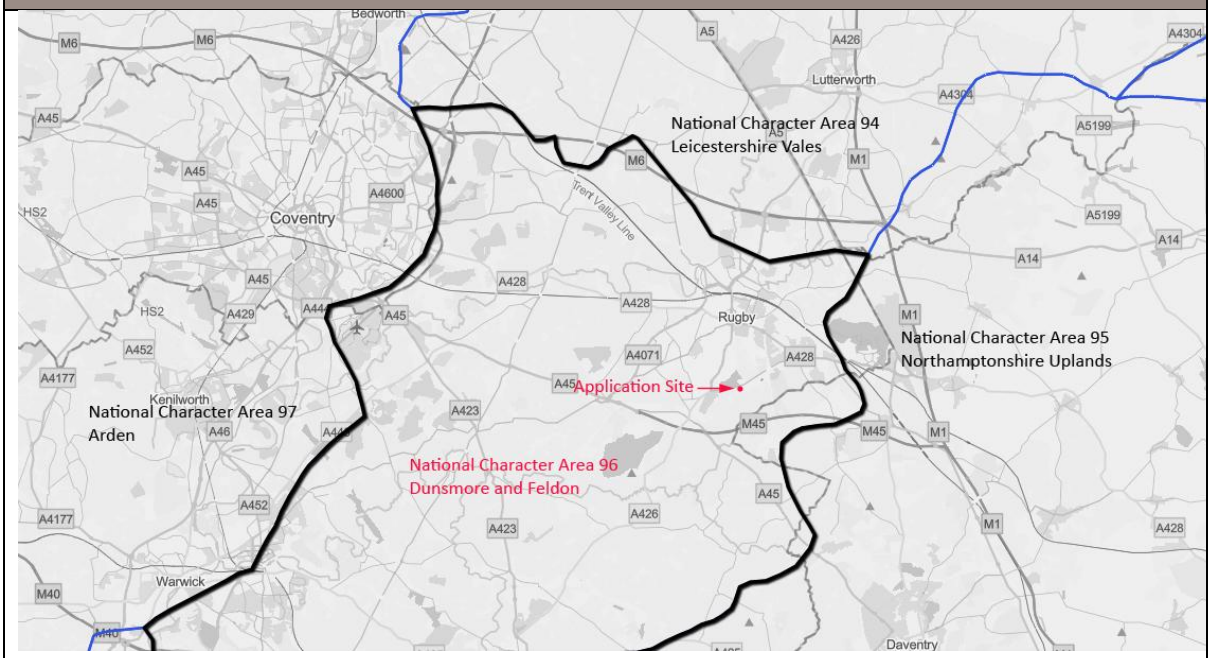
settlement pattern of farmsteads and groups of estate cottages as well as a number of large country houses and mansions including Bilton Hall and Dunchurch Lodge.

2.3 Published Landscape Character Assessments

Natural England - National Character Area 96 – Dunsmore and Feldon

2.3.1 The application site is in the north eastern section of NCA 96 Dunsmore and Feldon with the following key characteristics (**See Figure 4)**:

Figure 4: NCA 96 – Dunsmore and Feldon



Source: Natural England

- Sense of a predominantly quiet, rural landscape heightened by its close proximity to several urban areas, with a gently undulating landscape of low hills, heathland plateaux and clay vales separated by the occasional upstanding escarpment.
- Soils supporting mixed farming and some intensive arable and grazed pasture.
- Generally low woodland cover across the area, although there are areas of well-wooded character and ancient woodlands, especially in the north, providing habitats for bluebells, molluscs and fritillary butterflies; these woodlands are linked with landscape parklands and hedgerow trees.
- Remnants of the formerly extensive Dunsmore Heath, preserving characteristic heathland archaeology can still be found in woodland clearings. Natural regeneration on sand and gravel soils along roadside verges, although bracken is often abundant.
- Narrow, meandering river valleys with pollarded willows, streamside alders and patches of scrub supporting dipper, kingfisher, otter and Atlantic stream crayfish.
- Canals including the Grand Union Canal and Draycote Reservoir provide important riparian habitats and a well-used recreational resource. Draycote Reservoir is 3.5km to the south west of the application site.

- Mainly large fields with regular or rectilinear shapes, although some smaller fields also feature. Numerous areas of remnant ridge-and-furrow and earthwork remains of medieval settlements as found at Lower Tysoe, Radwell and Napton on the Hill.
- Predominantly nucleated settlement pattern with a low density of isolated farmsteads and some field barns sitting within a landscape of piecemeal and planned enclosure of the open fields which extended from the villages over large parts of this area. Many villages have recently expanded but the traditional buildings, constructed of red brick or Lias limestone still retain their blue brick or ironstone details.
- The busy roads and large industrial units on the outskirts of the main settlements of Leamington Spa, Coventry and Rugby exert an urban influence on the surrounding area. The area to the north is intersected by 3 motorways, the M1, M6 and M45 all of which are within 7kms of the application site.
- Limestone quarrying for the cement industry was formerly a feature in the centre and south of the area and disused quarries are now prominent elements in the landscape. The rock exposures and spoil heaps are of geological important, as well as having interesting limestone grassland communities. Newbold Quarry to the north of Rugby is now a nature reserve.

2.3.2 The overall trend in the landscape characteristics of this NCA are 'mixed change, mainly declining'. Objectives relevant to this report are given below:

SLO Code	Super Landscape Objective	Provisional Status	Change Trend
SLO1	Conserve and enhance the field boundary features and patterns that characterise our varied landscapes.	Neutral	Strongly declining
SLO8	Enhance the visual and experiential quality of our landscapes and waterscapes.	Unknown	Unknown
SLO12	Seek to conserve, enhance and increase characteristic broadleaved woodland through appropriate management.	Poor	Declining
SLO24	Connect existing broadleaved woodlands and enhance woodland cover, increasing extent of habit connectivity where appropriate.	Poor	Little change

Statements of Environmental Opportunity

- SEO 1: Protect and appropriately manage the historic character, settlement pattern and features of Dunsmore and Feldon, in particular its areas of …. veteran trees, country houses and landscaped parklands and enhance the educational, access and recreational experience for urban and rural communities.

- SEO 3: Protect and manage the mosaic of habitats including woodlands, hedgerows and heathlands.
- SEO 4: Protect and manage the landscape character, high tranquillity levels and the historic settlement character to enhance sense of place and of history and to promote recreational opportunities; and ensure that new development is sensitively located and designed, integrate green infrastructure links into development, encourage new woodland planting to soften urban fringe developments and promote recreational assets such as the National Cycle Routes.

Warwickshire Landscapes Guidelines - Dunsmore Plateau Farmlands

2.3.3 The area known as Dunsmore includes the wedge-shaped region of low ridges and valleys lying between Leamington Spa, Coventry and Rugby. It is described as a transition region, primarily a planned landscape of large fields and small villages, The heathy character and many large woodlands are more typical of Arden to the west, whilst the dissected rolling topography is more characteristic of the High Cross Plateau to the north.

2.3.4 The application site is located in the Plateau Farmlands, an intensively farmed, and in places urbanised region, with a varied rolling, dissected topography characterised by low glacial plateaux and incised, meandering river valleys with the following characteristics:

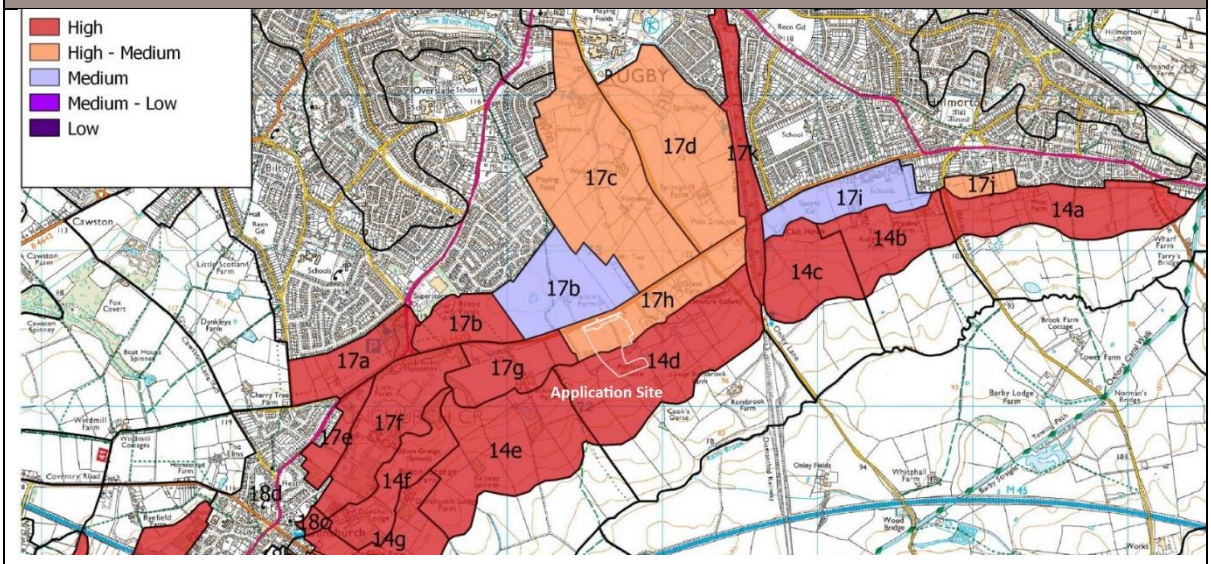
- A gently rolling topography of low glacial plateaux;
- An 'empty' landscape of former waste with few roads and little settlement.
- A regular geometric field pattern defined by closely cropped hawthorn hedges;
- Many mature hedgerow oaks;
- Large blocks of ancient woodland;
- An historic land use pattern reflected in the local abundance of 'heath' names;
- Remnant heathy vegetation in woodlands and roadside verges.
- Management strategy: Maintain and enhance the distinctive character of the landscape.

Rainsbrook Valley Landscape Sensitivity Study – Published January 2017

2.3.5 This study updates the Borough of Rugby Sensitivity and Condition Study of 2006, defining the Landscape description Units (LDU) into smaller Land Cover Parcels (LCPs) or zones. The 2006 study is not outlined here as the January 2017 update is more relevant to the Application Site. This study is assessed using a standard checklist, taking into account physical characteristics, key views, intervisibility, tranquillity, the settlement edge, potential receptors and other factors such as landscape enhancement/mitigation. The focus for the assessment is on identifying the landscape value as well as potential development opportunities for housing. A landscape's sensitivity is defined as the sensitivity of that landscape to a particular type of development, in this case housing.

2.3.6 The majority of the Application Site lies within Zone 17h, which was part of LCPs 72 and 73a in the earlier 2006 study. This is located within the **High/Medium sensitivity** category. **See Figure 5.**

Figure 5: Housing Sensitivity Map



Source: Rainsbrook Valley Landscape Sensitivity Study: Housing Sensitivity Map

2.3.7 This zone is described as comprising "*a regular small-medium scale field pattern of framed to enclosed pockets of pastoral farmland around a clear group of individual properties set within large grounds. A continuous tree belt adjacent to the roadside permits only glimpsed views into the zone. The presence of several mature field trees suggests that this zone may form part of a parkland setting*."

2.3.8 Assessments include:

Zone 17h	High/Medium sensitivity
Potential for housing development	*"There is scope for limited development but this should not extend into neighbouring zones. The existing landscape structure with mature trees must be retained."*
Cultural sensitivity	High
Ecological sensitivity	Moderate
Visual sensitivity	Low
Ecological Corridors	Declining
Sense of Enclosure	Framed to enclosed
Tranquillity	Medium - Noise sources from traffic

Key receptors	Rural residents with high sensitivity
	Road Users with low sensitivity
Views	The only views "*are glimpsed views through good tree cover from Ashlawn Road. There are occasional distant views across Rains Brook valley to the south.*"
Intervisibility	Low - with tree cover preventing extensive views into this zone.
Policy suggestions	The existing landscape structure with mature trees must be retained.

2.3.9 A small area of the Application Site falls within zone 14d, which was part of LCP 02 in the 2006 study. This is located within the **High sensitivity category**. **See Figure 5.** This zone is beyond the Dunsmore plateau on ground that slopes towards the river valley and lies to the west of Onley Lane. It comprises an open sub-regular medium-large scale field pattern of mixed farming. Internal field hedgerows are trimmed with insignificant hedge trees creating a very open landscape with extensive views to the south. The lack of tree cover removes the sense of scale and this may be compounded by lost sections of hedgerow.

2.3.10 Assessments include:

Zone 14d	High sensitivity
Potential for housing development	*"the sensitivity remains high (as in the previous study) because of the topography and openness of this zone."*
Cultural sensitivity	High
Ecological sensitivity	Moderate
Visual sensitivity	High
Ecological corridors	Declining
Sense of enclosure	Open
Skyline	Prominent along the zone's northern edge as this is on the higher ground of the plateau edge.
Key views	Views from PRoW R177 are of a large scale farmed landscape on rising ground. Trimmed hedgerows and only scattered trees give rise to an open landscape. Views from Onley Lane in the east are of a small scale pastoral landscape. Onley Prison and Onley Grounds Equestrian complex are detractors in views beyond the zone to the south.

	See **Viewpoints 5 and 6** taken on the Bridleway R177.
Intervisibility	High – the rising ground and openness of the zone make it highly visible. There are extensive views from the zone across the Rains Brook valley to the south.
Key receptors	PRoW users with High sensitivity
	Rural residents with High sensitivity
	Road users with Medium sensitivity
Tranquillity	High/medium – Noise: Traffic on M45, Urban views: Onley Prison, Onley Grounds Equestrian complex Presence of people: Infrequent
Policy suggestions	Gap up hedgerows, including hedgerow trees, where necessary.

2.3.11 The housing of the proposed development is confined to the northern area of the site (17h) which is described as having Low sensitivity and a 'Framed to enclosed' sense of enclosure. It confirms the mature planting to the north of the site along Ashlawn Road. The southern area will retain the parkland features through additional tree planting and pond creation, all designed to comply with the high sensitivity of the southern area of the site as outlined in the Landscape Sensitivity Study and also to increase biodiversity and link into the broader green infrastructure.

Rugby Borough Landscape Character Assessment – January 2025

2.3.12 This has been informed by a number of sources including the NCA for Dunsmore and Feldon, the 2006 Landscape Assessment (Sensitivity and Condition Study) 2006 and Rainsbrook Valley Landscape Sensitivity Study 2017.

2.3.13 The Application Site lies largely within the Plateau Farmlands Landscape Character Type, and whilst bordering the recent residential development to the north does match the description given of an 'empty' landscape with few roads and settlements. The gently rolling topography of the low glacial plateau is characterised by sandy soils, large areas of ancient woodland, and remnant heathland in woodlands and roadside verges. This report notes the landscape guidelines for the Dunsmore LCA, which include:

- Protect hedgerows and hedgerow trees many of which are Oak trees.
- Maintaining and enhancing the enclosed wooded character of the landscape.
- Maintaining and enhancing the distinctive character of the landscape. This is especially important in the Plateau Farmlands, which is the LCT of the Application Site.
- Planting of woodlands should be encouraged where appropriate.

- Protect and manage the historic character and settlement pattern, including the deserted settlements, ancient settlements, veteran trees, farmsteads, country houses and landscaped parklands.
- Enhance the character of settlements in accordance with the landscape through improved design standards.

2.3.14 Overall, the report concluded that the land use within the borough is predominantly agricultural, comprising extensive areas of arable land and improved pasture. The landscape character of the borough is increasingly visually influenced by the concentration of commercial buildings, particularly large distribution centres and warehouses surrounding key infrastructure routes. This is particularly notable in the Dunsmore and High Cross Plateau LCAs.

2.3.15 Generally, outside the town of Rugby "the gently rolling farmed landscapes which include large fields as well as hedgerows and infrequent woodlands do not generally give rise to conspicuous distinctive landscapes." The only valued landscape in the borough was in the far south in the village of Flecknoe and Bush Hill, located within the Ironstone Fringe LCT (part of the Feldon LCA).

Housing and Economic Land Availability Assessment (HELAA), Rugby Borough Council, March 2025;

2.3.16 This is a technical assessment of the range of sites available to meet the need for housing and employment land, covering sites put forward by landowners and sites identified by officers through a desktop review.

2.3.17 The Application Site, reference 52 in this assessment, was discounted as being suitable for residential development. However, in the Suitability commentary it is noted for Site 52 "*Not considered suitable for residential as a stand-alone site but also could be considered as part of a strategic site with larger adjoining land parcels*". Inwoods Park was not included in this study, but did have extant planning permission for residential and at the time of writing this report was being developed for residential development.

Figure 6: Conclusions on the availability of the Application Site to meet the need for housing in the HELAA, March 2025

Conclusions

Available	**yes - immediately**
Achievable	**Yes**
Suitable	**No**
Suitability commentary	Partially within potential GI corridor. Line of trees covered by TPO's within and adjacent western part of site. Site abuts an area of Priority Habitat - Deciduous woodland to its south/west. An appropriate buffer may be required to mitigate any impacts. Locationally inappropriate, causing sustainability concerns despite lying adjacent site that has extant planning permission for residential. Not considered suitable for residential as a stand-alone site but also could be considered as part of a strategic site with larger adjoining land parcels.
Discounted?	**True**
Justification for discounting	Settlement character piecemeal, incongruous development separate from settlement edge

2.3.18 The Stage 2 Site Assessment Report gives a detailed assessment of 112 sites identified in the HELAA as not being developable without changes to policy. The assessments primarily provide a technical analysis of constraints and opportunities. The Application Site, Site 52 was not included in this assessment. Site 91 Inwoods Farm and Lower Rainsbrook Farm, east of Dunchurch, is a large site, which although not progressed beyond this Stage 2 Assessment did present some opportunities "*Employment and residential with a district centre and open space*", which with "*careful development could enhance the local built environment, with measures such as informed arrangement of development parcels, avoiding development near the park boundaries….*"

2.3.19 The Application Site would no longer be an "*incongruous development separate from settlement edge",* as Inwoods Park, adjacent to the Application Site is in the process of development with 25 homes. In addition, the Application Site lies directly opposite Ashlawn Gardens. There is also some precedent for building modest estates south of Ashlawn Road and not in the context of a settlement edge on Gorse Farm Close, and east of Onley Lane off Windmill Drive.

Warwickshire Historic Landscape Characterisation Report (HLC)

2.3.20 Ashlawn House is mentioned in the HLC as one of the smaller designed parks associated with small country houses (p.263). The site certainly has a parkland character with the entrance, gatehouse, tree lined driveway to the house and scattered mature trees, and the report notes that proposed developments should be informed by the parkland features.

2.4 Planning and Designations

National Planning Policy

2.4.1 The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans can provide for housing and other development in a sustainable manner.

2.4.2 Strategic policies include the "*conservation and enhancement of the natural, built and historic environment including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation*". (Paragraph 20)

2.4.3 Planning policies and decision should ensure that:

- developments are "*sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities*)" and "*Establish or maintain a strong sense of place*". (Paragraph 135)
- streets are tree-lined and opportunities taken to incorporate trees in for instance parks and orchards and that existing trees are retained wherever possible. (Paragraph 136)

Local Planning Policy – Local Development Plan 2011-2030 – Rugby Borough Council

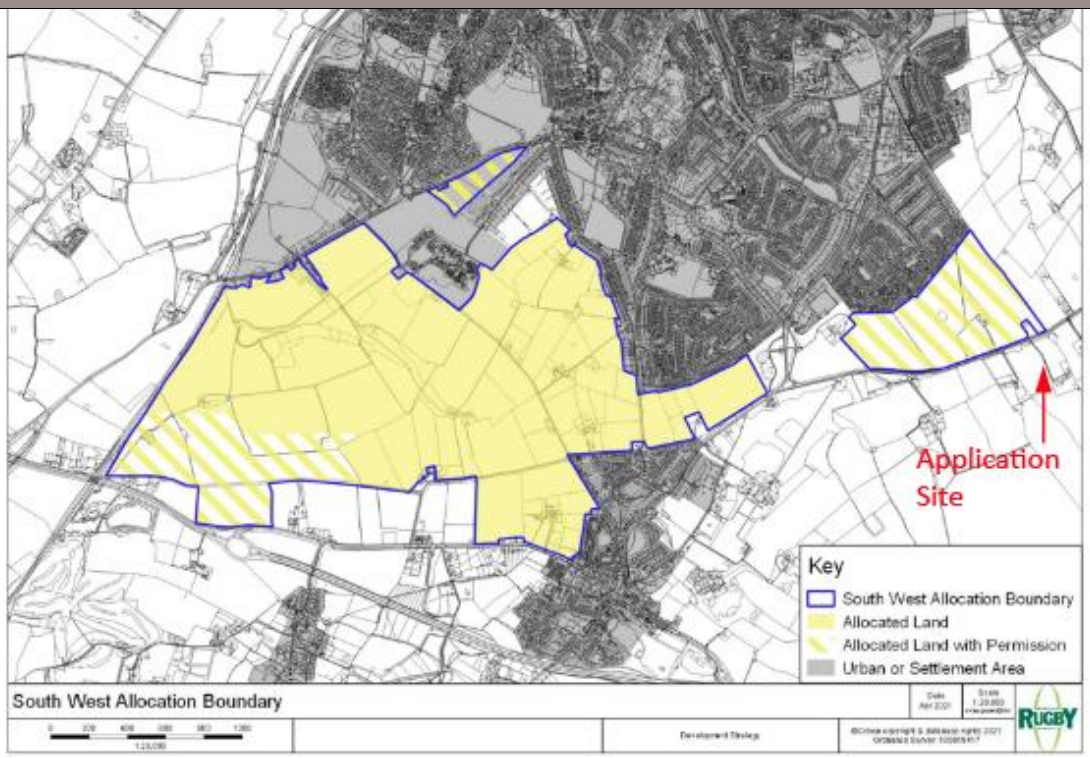
2.4.4 The Local Development Plan (2019) sets out the growth requirements, vision and spatial objectives for the development of Rugby Borough up to 2031. Although Rugby Borough is predominantly rural, the town dominates and is the headquarters of the Borough Council.

2.4.5 At the time of writing this report the Council is in the process of reviewing the Local Plan.

2.4.6 The Application Site lies outside of the urban edge on the Urban Policies Map and doesn't lie within the Green Belt, an Employment Site, Open Space or Conservation Area.

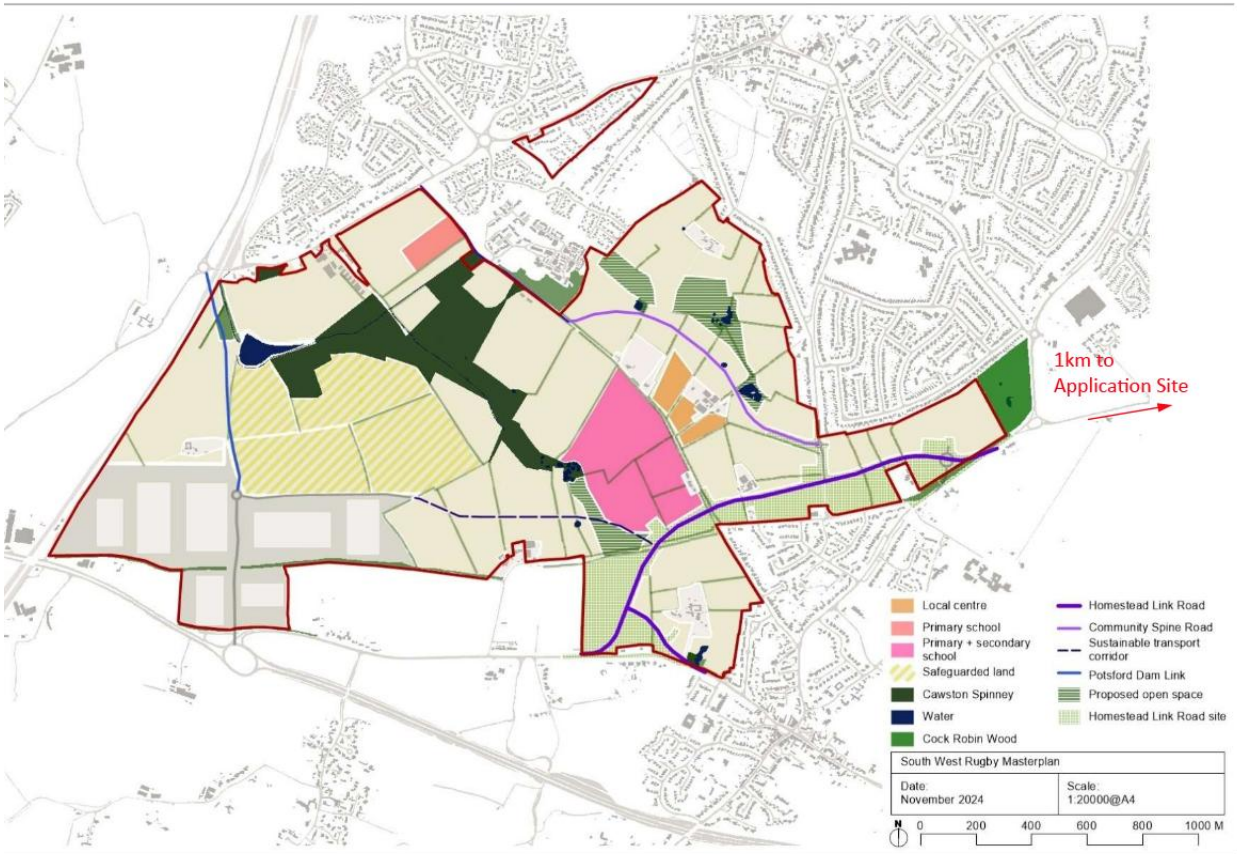
2.4.7 Nor does it lie within a housing Allocated Site. The Application Site does, however, lie in close proximity to the South West Rugby Development, a new neighbourhood of around 5000 dwellings and 35ha of B8 employment land allocated on land to the South West of Rugby as indicated in **Figure 7**, which will include new infrastructure and services including schooling, community facilities, health care and provision for a Safer Neighbourhood Team including a fire and rescue provision, to be delivered by a number of land owners and developers. This will be a new mixed-use district centre as indicated in **Figure 8** with the consequent benefits for the residents of the proposed development.

Figure 7: South West Allocation Boundary



Source: South West Rugby Masterplan SPD

Figure 8: Masterplan of South West Rugby Masterplan

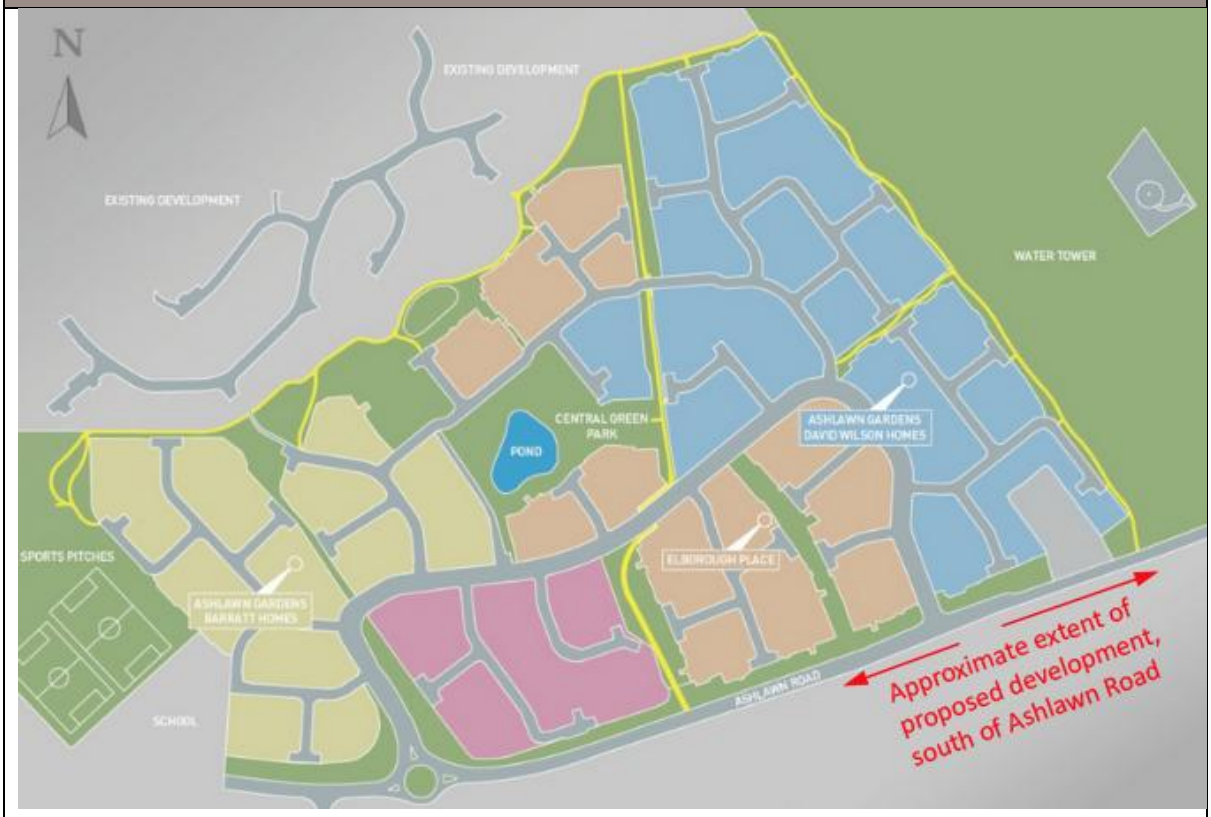


Source: South west Rugby Masterplan, SPD, Rugby Borough Council

2.4.8 The South West Rugby Masterplan also proposes a sustainable transport provision that integrates with existing network. The western part of Ashlawn Road is part of The Spine Road Network that creates connectivity between the south west Rugby developments.

2.4.1 The South West Rugby Development will be phased, and the first phase, nearing completion, is Ashlawn Gardens, David Wilson Homes, which lies opposite the Application Site to the north of Ashlawn Road. **See Figure 9**.

Figure 9: Application Site in relation to new development



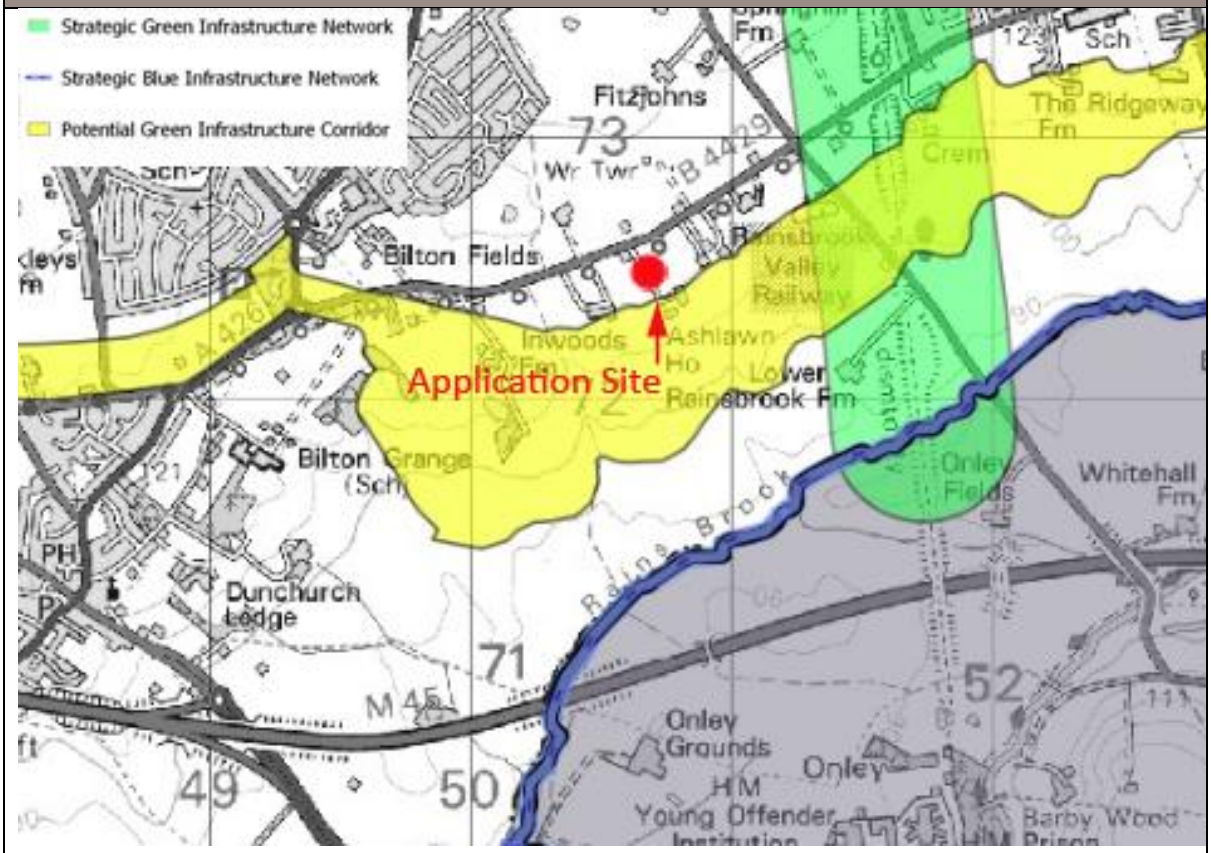
Source: Barratt Homes

2.4.2 The Local Development Plan, paragraph 9.7, notes that securing improvements to biodiversity is one of the key roles in achieving sustainable development. Policy NE2 Strategic Green and Blue Infrastructure notes that "*The Council will work with partners towards the creation of a comprehensive Borough wide Strategic Green and Blue Infrastructure Network achieved through:*

- *The protection, restoration and enhancement of existing and potential Green and Blue Infrastructure assets within the network as shown on the Policies Map; and*
- *The introduction of appropriate multi-functional corridors between existing and potential Green and Blue infrastructure assets.*
- *Where appropriate new developments must provide suitable Green and Blue Infrastructure corridors throughout the development and link into adjacent strategic and local Green and Blue Infrastructure networks and assets where present. Where such provision is made a framework plan should be produced as part of the planning application demonstrating the contribution to the overall achievements of the multi-functional strategic Green and Blue infrastructure network. A management plan, based on delivering the framework plan and detailing how the infrastructure will be managed, may be required by condition.*

2.4.3 The Application Site is partially within the Potential Green Infrastructure Corridor. **See Figure 10.** Policies NE2 Strategic Green and Blue Infrastructure, NE3 Landscape Protection and Enhancement and SDC2 Landscaping, have informed the landscape design of the proposed development. The proposals have integrated the landscape planning into the design of the development at an early stage and taken account of its distinctive parkland character, any potential visual impacts, habitat biodiversity and connecting with the existing GI network in the area. Important site features of ecological significance have been retained and form an integral part of the design.

Figure 10: Application Site in relation to GI Policies



Source: Local Development Plan GI Policies Map

Rugby Borough Local Plan Preferred Options document

2.4.4 This is a key planning document that presents Rugby Borough Council's proposed development strategy for the borough for the period 2024-2045. This document is informed by feedback from consultation and new evidence on a range of topics.

2.4.5 The report notes in the Summary of key points, that much of the housing need for the new plan period up to 2045 already has planning permission or was allocated in the 2019 plan. However, "*additional land is needed for around a further circa 3500 homes. The preferred strategy to accommodate these is a more dispersed approach with small and medium sized sites at Rugby and at villages with existing facilities and services such as schools, shops and businesses.*" In addition, "*New employment sites have been identified with a range of*

*employment types accommodated. These are located alongside existing employment sites and close to the workforces in Rugby and Coventry." (*Source: https://www.rugby.gov.uk/w/local-plan-review-faqs#development-strategy)

2.4.6 Strategy S5 Countryside protection notes that "*outside of the settlement boundaries shown on the policies map, new development will only be permitted where it is in accordance with a policy of this plan which supports development in such locations.*" The proposed development borders the settlement boundary and is in close proximity to the South West Rugby Development, as indicated in **Figure 7**, which will include new infrastructure, services and employment opportunities.

2.4.7 There are no statutory designations on the Application Site. MAGIC MAP indicates that the site is a Woodpasture and Parkland BAP Priority Habitat, which has been addressed in the design of the site by retention of the majority of the existing hedgerows and the woodland to the north of the site as well as extensive new tree planting.

2.4.8 The mitigation hierarchy for the proposed development conforms to point A in EN1 Biodiversity and geodiversity protection and applies a mitigation hierarchy of avoid, mitigate and compensate. (**See paragraph 2.7**).

2.4.9 EN2 notes that the development shall avoid significant adverse impacts on landscape character and visual impacts and be located and designed to respect scenic quality and maintain a distinctive sense of place. Development proposals must avoid detrimental impacts on landscape features that make a significant contribution to the character of the area of a heritage asset or settlement including woodland, trees and veteran trees and hedgerows.

2.4.10 In EN4 Biodiversity net gain (Environment chapter) states that under Part 6 of the Environment Act 2021 there should be a minimum 10% BNG, ideally delivered on-site.

2.4.11 The Wellbeing chapter W2, sets out open space standards for residential development of 10 or more dwellings. The southern end of the proposed development has approximately 2.87ha of open space with natural and semi natural green spaces, amenity green spaces and an accessible LEAP and LAP.

2.4.12 Policy D1 notes that all developments shall respond appropriately to context and character and maximise connections beyond the site, for people and nature; create connected, legible and permeable public spaces; integrate and reuse existing natural and built assets within the site; and have an appropriate relationship with and enclose to the street.

2.4.13 The proposed development conforms to the requirements of D3 Landscaping including retaining and integrating existing natural features and assets, incorporating street trees and soft landscaping into the street design. The existing boundary treatment to Ashlawn Road will be retained avoiding a harsh transition to the street. It will use native planting and maintain and enhance green infrastructure with retaining and enhancing the hedgerow and woodland habitats.

2.4.14 This report considers that the proposed development fulfils policies EN1, EN2, EN4, W2, D1, and D3.

South West Rugby Masterplan Supplementary Planning Document

2.4.15 The Spatial Vision in the Local Plan notes that "The majority of new sustainable housing and employment development will be focused on Rugby urban area. Sustainable growth of main rural settlements will also take place to meet the housing needs of the rural population and provide support for rural infrastructure and services."

2.5 Designations

Statutory Designations

2.5.1 DEFRA's (Department for Environment, Food and Rural Affairs) MAGIC (Multi Agency Geographic Information for the Countryside) database, indicates that there are a number of designations within and beyond a 2.5km radius of the proposed site, (**See Figure 11).** They tend to be located on the periphery of the built up area of Rugby, several to the south of AshLawn Road including the Application Site, which is a Wood-pasture and Parkland BAP Priority Habitat, a non statutory designation. There is also a Drinking Water Safeguard Zone (Surface) Water, non statutory designation, over the majority of the site.

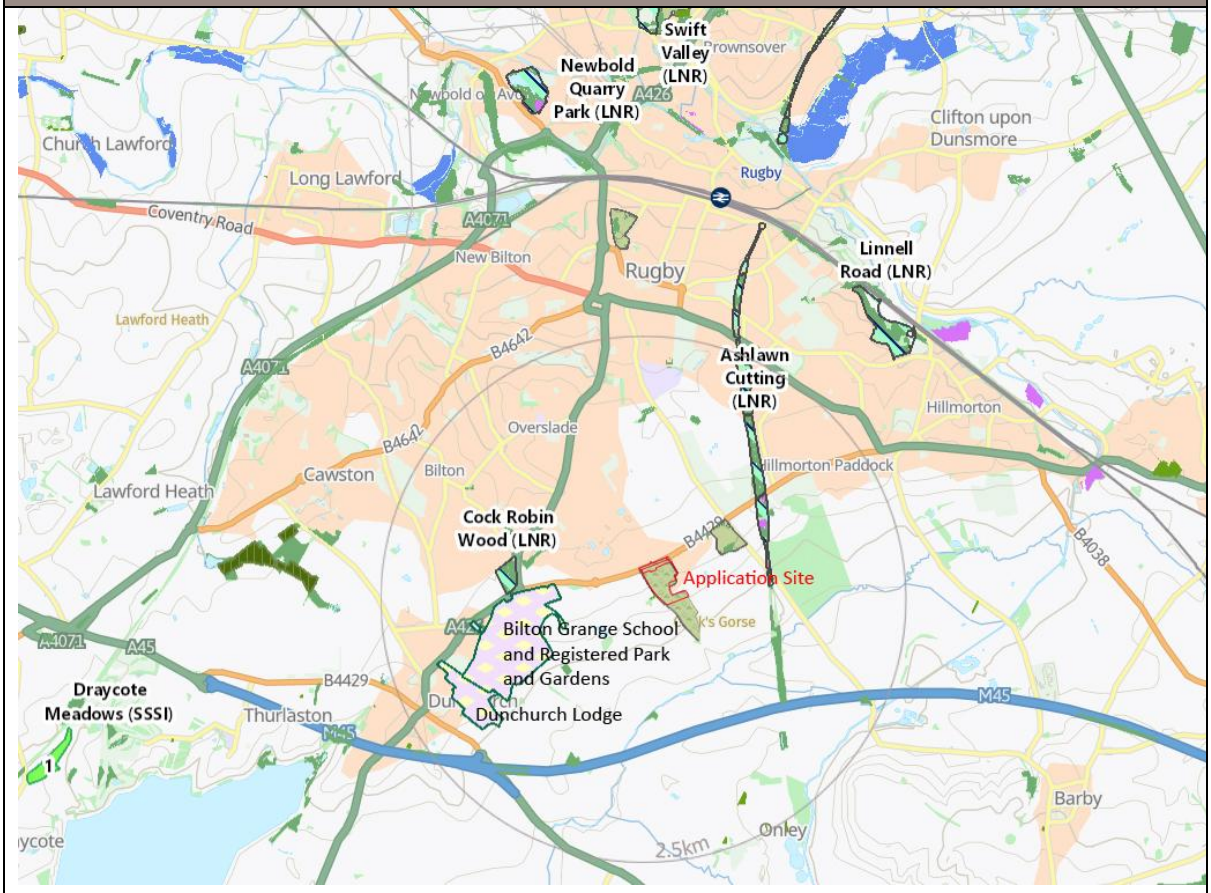
Ecology:

2.5.2 Within the Borough there are a number of Local Nature Reserves (LNRs), including Ashlawn Cutting LNR 860m north east of the Application Site, which is the nearest statutory designated site. Ashlawn Cutting is part of the disused railway network and is an important recreational resource as well as being of particularly high biodiversity value and providing good connectivity between the urban and rural areas. Cock Robin Wood LNR is 1.2km to the south west. There are no National Nature Reserves within the Borough.

2.5.3 The Registered Parks and Gardens of Bilton Grange and Dunchurch Lodge lie between 900m and 1.7kms to the south west and are sites of Wood-pasture and Parkland, Broadleaved and Deciduous Woodland, Conifer Woodland (BAP Priority Habitats). The nearest Site of Special Scientific Interest (SSSI) is Draycote Meadows 5.5km to the south west.

2.5.4 Beech Tree House at the junction of Ashlawn Road and Onley Lane is a Woodpasture and Parkland BAP Priority Habitat. There are also areas of good quality semi improved grassland, deciduous woodland (part of the National Forest Inventory 2020), and traditional orchards (HAP Inventory 2024).

Figure 11: Land based designations



Priority Habitat Inventory - Deciduous Woodland (England)

Priority Habitat Inventory - Traditional Orchards (England)

Woodpasture and Parkland BAP Priority Habitat (England)

Priority Habitat Inventory - Good quality semi-improved grassland (Non Priority)

Woodland

Ancient Woodland (England)

Ancient and Semi-Natural Woodland

Ancient Replanted Woodland

Ancient Woodland – Revised COMPLETED COUNTIES

Ancient & Semi-Natural Woodland

Ancient Replanted Woodland

Ancient Wood Pasture

Source: Magic Map, DEFRA

Culture and History:

2.5.5 The town was shaped by the arrival of the railways in the 19th century and is well known for Rugby School, the invention of the jet engine by Frank Whittle and the Rugby Cement Works, which dominate the town and skyline for miles around.

2.5.6 The Application Site lies in the centre of a number of clusters of Historic Statutory and Non-statutory Designations, approximately 2km north around Rugby and approximately 1km south west around Dunchurch. Smaller clusters lie 2.2km north west around Bilton and 2.5kms north east around Hillmorton. In addition, the abandoned medieval village site at Onley (Scheduled Monument: 1003900) lies under 2kms to the south of the Application Site. First documented in 1272 this is a well defined settlement earthworks and associated ridge and furrow depicting the form and plan of the settlement and its associated agricultural practices. See **Figure 12.**

2.5.7 Closest to the Application Site is Bilton Grange School and attached chapel and terrace Listed Building Grade II*: 1034932 along with Bilton Grange Registered Park and Garden Grade II: 1001378. Just under 1km south west of the Application Site the c.50ha site comprises c.11ha of mid-Victorian gardens and pleasure grounds and c.39ha of parkland occupying the level summit of a ridge of high ground. There are a number of Listed Buildings related to Bilton Grange School including Rugby Road Lodge (1271241), Inner Lodge (1271243), Gardener's Cottage and Attached Garden Walls (1271244). In addition, Cock Robin Cottages, (Listed Buildings 1246640) comprise a row of 4 cottage, located on Rugby Road, Dunchurch.

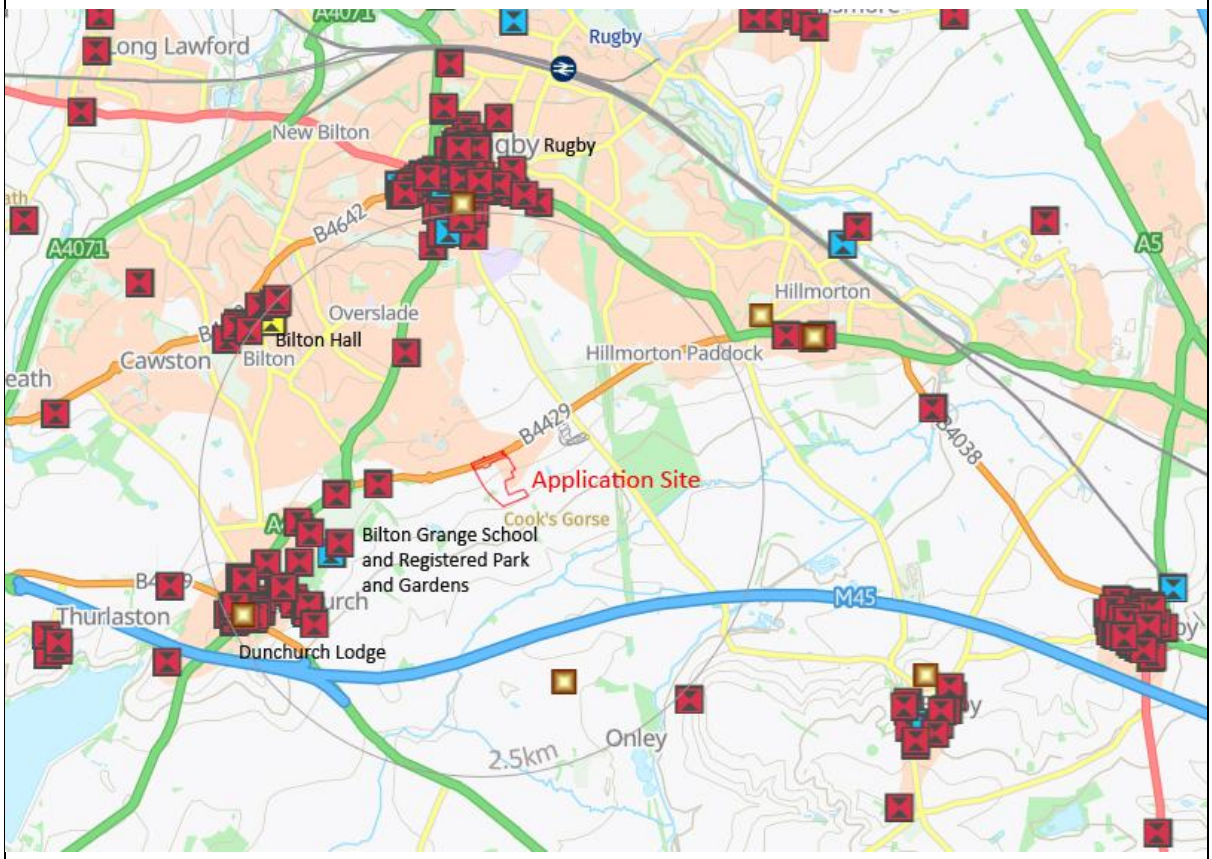
2.5.8 To the south west of the Application Site lies Dunchurch Lodge (1001281), a Grade II Listed Building and Registered Park and Garden. Further Listed buildings at Dunchurch include the Church of St Peter a grade II* (1185418); Market Cross (1034938) and a Medieval standing cross in The Square (0106684). 5 Listed buildings lie off The Heath and c.25 Listed buildings clustered around Daventry Road and Southam Road in the centre of Dunchurch.

2.5.9 Within 3km north of the Application Site are clusters of Listed Buildings along Bilton Road and Warwick Street including those around Rugby School.

2.5.10 To the east of the Application Site clustered around the High Street at Hillmorton are 4 Listed Buildings and 2 Scheduled Monuments.

2.5.11 1.1km to the north west between the Application Site and Rugby is Shepherds Hey Grade II Listed Building (1389415).

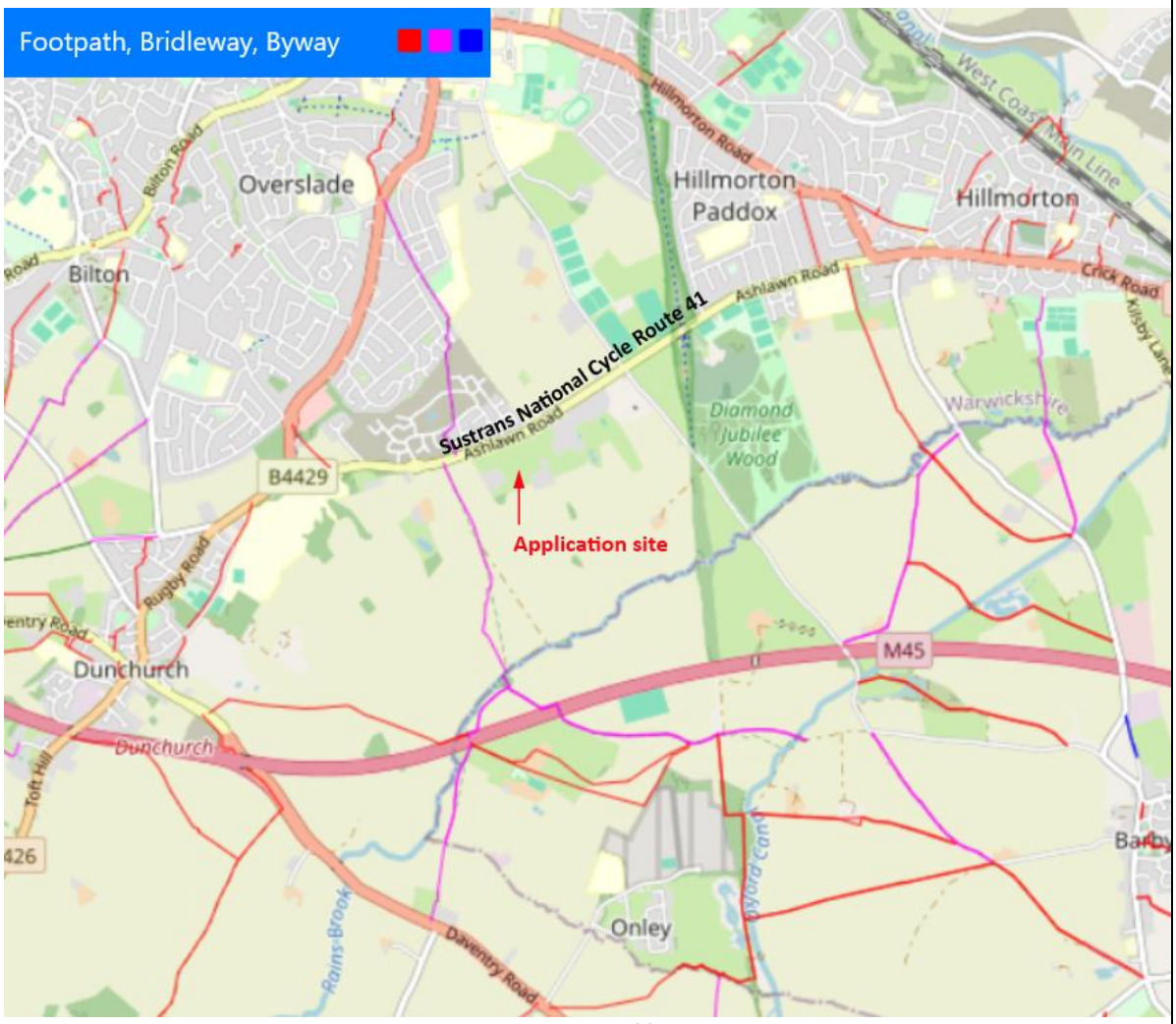
Figure 12: Historic designations within 3kms of the Application Site



Source: Magic Map, DEFRA

2.5.12 There are no Public Rights of Way on the Application Site. See **Figure 13.** A bridleway lies to the west of the Application Site running south and to the north through Ashlawn Gardens to Rugby city centre (PRoW R177). The Sustrans National Cycle Route (NCR 41) borders the site's northern edge on Ashlawn Road.

Figure 13: Public Rights of Way



Source: Footpath Map https://footpathmap.co.uk

2.6 Proposed development

2.6.1 The proposed development comprises the erection of up to 90 residential dwellings (Use Class C3) including 28 affordable homes, 9 self-build/custom build homes, 9 accessible homes to M4(3) standards and 6 specialist homes.

2.6.2 The design of the development has been landscape-led with an emphasis on tree retention, new tree planting and enhancement of grasslands such that the proposed development retains the sites existing parkland character. **See Figure 14**

Figure 14: Proposed development



Source: Sworders Surveyors, Planners, Architects

2.6.3 The proposed development retains the existing access which will continue to serve Ashlawn House, Ashlawn Lodge and The Bungalow. The new primary access is proposed at the existing field to the east of the site frontage on Ashlawn Road. This will lead onto a spine road that runs through the development off which are several secondary and tertiary roads.

2.6.4 A dedicated pedestrian access at an existing field access to the west of the site frontage will link to the existing pedestrian infrastructure along the public highway (Ashlawn Road) and a new pedestrian refuge crossing over Ashlawn Road. The site is also served by dedicated pedestrian and cycle links that extend through the site providing permeability for pedestrians alongside several amenity pathways within the on-site open space provision.

2.6.5 The proposed development comprises approximately 2.28ha of public open space. This includes 0.49ha of natural and semi-natural green space to the north of the site alongside the dedicated pedestrian and cycle link, 1.22ha of amenity green space to the south of the developable area and 0.05ha of children's play area provision comprising both a Local Area for Play (LAP) and a Local Equipped Area for Plan (LEAP). The LAP and LEAP would be open to the public, but most likely would only be used by residents given the proximity to the children's play area at Ashlawn Gardens. A financial contribution will also be made toward off-site open space provision.

2.6.6 The proposed surface water drainage strategy comprises of rainwater harvesting, permeable paving and an above ground attenuation feature which will drain to an existing ditch to the south west of the application site. The proposed attenuation feature has been designed to hold water and has been incorporated as part of the amenity green space to improve the visual amenity for future residents. The proposed development also includes provision of a pumping station located to the west of the attenuation feature.

2.6.7 The proposed development has been designed to be Net Zero in operation. This will be achieved through the use of Passivhaus design principles, a communal Ground Source Heat Pump (GSHP) system and provision of approximately 685 rooftop mounted solar PV panels.

2.7 Enhancement and Mitigation

Construction Stage Mitigation

2.7.1 Standard construction management plans in accordance with the local authority guidance.

2.7.2 Deliveries will be timed outside of peak hours.

2.7.3 Pollution prevention measures and control of disturbance including dust, mud, noise. Damaged surfaces to be made good.

2.7.4 Temporary hoarding consisting of visually impermeable fabric or hoarding board, for the full duration of construction will be erected around construction areas to clearly delineate working areas and protect the public from the works. This will reduce visual effects to the receptors on Ashlawn Road for the construction period. Scaffolding fully sheeted.

2.7.5 Publicity material may be displayed on the hoardings to inform the public and passers-by about the proposed development.

2.7.6 Lighting will be maintained in good order and provided where necessary to ensure sufficient

illumination. Precautions will be taken to ensure no shadows are cast by hoardings or building works onto pavement and road areas. Internal construction lighting will be angled so that it does not cause nuisance to adjacent properties or carriageways.

2.7.7 An effective site and litter management system will be established from the outset to ensure a clean, tidy and presentable image.

Design Mitigation

2.7.8 The proposed development is low lying comprising two-storey houses with single-storey dwellings to the north of the west field and on the edge of the development in the eastern field, set back approximately 85m from Ashlawn House and The Bungalow. **See Figure 15.**

Figure 15: Building heights of proposed development



Source: Sworders Surveyors, Planners, Architects

2.7.9 The design has sought to provide housing in the context of the existing parkland setting of the Application Site. There is extensive tree planting within the built area. The area to the south of the site is a particularly sensitive due to the open views from the west field and will not have any built form but be open land with tree planting, which will retain/enhance the parkland estate character and contribute to the Biodiversity Net Gain (BNG) Strategy.

2.7.10 The proposed development has been designed to retain as many existing trees as possible and will retain the high quality mature trees on the site and boundaries. The removal of one tree from a high value group at the eastern boundary will be more than compensated for by the proposed planting of new trees.

2.7.11 The site will retain its tight visual envelope. Hedgerows removed to enable circulation of the site will be compensated for by strengthening existing hedgerows and planting of new hedgerows. Boundaries to be strengthened include the eastern boundary, northern boundary and western boundary. Mitigation planting to accord with that proposed by the planting strategy of Inwoods Park will provide a measure of separation between the two developments.

2.7.12 It is proposed to plant a buffer to provide an element of separation for Ashlawn House but it is intended to keep the southern boundary open to retain the expansive views and connection with the Rains Brook Valley and existing green infrastructure. Landscaping between the southernmost dwellings and the edge of the development will ensure screening of the dwellings from any long distance views from the south of the site.

2.7.13 The proposed development will comprise approximately 2.8ha of public open space, which includes natural and semi-natural green space to the north and amenity green space and a children's play area (LEAP and LAP) to the south of the site.

2.7.14 New planting to comprise native species which are of ecological value appropriate to the area. (Policy SDC2 Landscaping, Rugby Borough Council, Final Local Plan 2011-2031).

2.7.15 The proposed development has a variety of styles, materials and sizes conforming to the housing in the wider area including Ashlawn Gardens and Inwoods Park in the process of construction.

2.7.16 Lighting will balance safety and security with environmental concerns like minimising light pollution and preserving the natural darkness of the rural area.

2.7.17 Vehicle and pedestrian entrance/egress will use the existing field accesses. The existing main entrance will remain for Ashlawn House, Ashlawn Lodge and the Bungalow. The existing field entrance to the east will be the main vehicular access complying with highways regulations and will retain as much vegetation as possible. The existing field access to the west will be a pedestrian and cycle path that links to the bridleway across Ashlawn Road through Ashlawn Gardens.

2.7.18 Detailed arrangements are to be incorporated for the long-term management and maintenance of the landscape features. (Policy SDC2 Landscaping, RBC).

2.7.19 The surface water drainage strategy comprises SUDs features including rainwater harvesting, permeable paving and an attenuation feature designed to hold water and enhance the amenity green space and the visual amenity for the residents as well as create new habitats and increase biodiversity.

2.7.20 The proposed development is designed to be Net Zero in operation, achieved through Passivhaus design principles, a communal Ground Source Heat Pump, and the provision of approximately 685 rooftop mounted PV panels.

2.7.21 Landscape plans will increase native species and have a variety of planting to ensure seasonal interest throughout the year. The Warwickshire Landscape Guidelines for Dunsmore notes that new woodland planting should favour oak as the major tree species with pine and silver birch on sandy soils.

3 Impact Assessments

3.1 Landscape Impact Assessment

3.1.1 The level of landscape effects is determined by assessing the sensitivity of the landscape resource and the magnitude of the effect of the proposed development (both physical and perceptual).

3.1.2 The sensitivity of the landscape resource is determined by a combination of the landscape value and the ability of the landscape receptor to accommodate the proposed development without undue consequences for the maintenance of the baseline.

3.1.3 The table below summarises the components affecting the landscape value of the Application Site and wider study area.

Table 6

Factors Affecting Landscape Value		
Factors	**Comment**	**Landscape Value**
Landscape Quality/Condition	The Application Site is a well maintained landscape with beech hedgerows framing the entrance from Ashlawn Road. It is fairly well contained on all boundaries except for part of the southern boundary of the western field, which is demarcated by fencing and has scenic, open views across the Rains Brook Valley. The scattered mature trees, especially in the east field give the land an estate parkland setting.	Moderate
Scenic Quality	Views within the site are foreshortened by the boundary trees and vegetation apart from the southern site boundary of the western field, which has scenic, open views across the Rains Brook Valley.	Moderate
Rarity	Ashlawn House is mentioned in the HLC as one of the smaller designed parks associated with small country houses (p.263).	Moderate
Representativeness	The site and its surrounding are reasonably typical of those characterised in Zone 17h as outlined in the Rainsbrook Valley Landscape Sensitivity Study. It is in close proximity to rapidly expanding residential housing to the south of Rugby.	Moderate
Conservation Interests	The site has a large number of high quality Category A and Category B trees, which gives the landscape its sense of place and parkland setting.	Moderate
Recreational value	The site is used for grazing cattle and horses and is not accessible to the public.	Low
Perceptual aspects	The site is on a busy road with a large housing development opposite, however perception on the site is of a rural setting and estate parkland, no doubt influenced by the mature trees on site and the wider	Moderate

Factors Affecting Landscape Value		
Factors	**Comment**	**Landscape Value**
	landscape, with agricultural fields to the south which look over Rains Brook Valley.	
Overall Landscape Value		**Moderate**

3.1.4 **Table 7** summarises factors affecting the ability of the Application and wider area to accommodate the proposals without affecting the landscape character.

Table 7

Factors affecting the ability of the Application Site and wider area to accommodate the proposed development	
Factors	**Comment**
Land cover	
Existing residential development	The Application Site is on the opposite side of Ashlawn Road to the new development, partly constructed, of Ashlawn Gardens part of the South West Rugby Masterplan, extending the southerly residential area of Rugby. In addition, construction on Inwoods Park is in the early stages and this is adjacent to the west field of the Application Site. The proposed development would be extending this residential area. Ashlawn House and The Bungalow lie outside of the site boundary and look out across the east field of the proposed development. There is a level of separation by a row of mature tilia and this will be strengthened with additional planting. Ashlawn Cottage is alongside the existing field gate in the east field and proposed main vehicular entrance to the site. Mitigation in the form of strengthening the planting on the eastern boundary of the east field will reduce the visual impact of the proposed development.
Existing trees, hedgerows and shrubs	The fields are used for grazing cattle and horses and have a large number of high quality Category A and Category B trees. In addition, there are mature and robust hedgerows bordering the majority of the site.
Adjacent Urban Settlement	
Nature of existing urban edge	The Application Site lies at the urban edge with extensive new build housing to the north and a new housing development in the process of construction to the west. Agricultural fields lie to the south, west and east of the Application Site.

Factors affecting the ability of the Application Site and wider area to accommodate the proposed development	
Factors	**Comment**
Settlement pattern	The settlement pattern to the north comprises a mix of low rise, relatively high-end housing of a variety of house types, materials and sizes. Beyond the new building housing the existing residential area of the south of Rugby is low rise detached and semi-detached properties with front and rear gardens. To the east are a couple of small high-end developments.

3.1.5 The Application Site has a distinctive parkland identity and is assessed as of moderate landscape value and the area of the housing largely low visual sensitivity. The site has a high level of containment and there are good opportunities for mitigation and enhancement. A large area of the site to the south will be exclusively green field comprising a SUDs pond and tree planting, creating new habitats that will replicate the parkland feel that gives the Application Site its quality and value. The proposals contribute to the Super Landscape Objectives in the Dunsmore and Feldon NCA and the Statements of Environmental Opportunity by protecting, enhancing and managing the existing habitats and integrating with the green infrastructure to the south. It is considered that the Application Site and wider area have a good ability to tolerate the nature/scale of the development without an adverse effect on the local or national landscape character.

Site Preparation and Construction Works

3.1.6 During construction, potentially adverse temporary/short term landscape and visual impacts are likely as a result of the following:

Table 8

Construction works			
Construction operations	**Extent**	**Duration of construction works**	**Level of effect (adverse)**
Site establishment: hoardings on Ashlawn Road and open areas of site including the east field and southern boundary to Ashlawn House, storage and compound areas, welfare facilities, security and safety lighting.	Local – greatest impact on the residents in Ashlawn Cottage, The Bungalow and Ashlawn House and pedestrians on Ashlawn Road. Residents in Ashlawn Gardens opposite will be largely unaffected as the construction activities are well set back from Ashlawn Road.	Short term	Moderate

Construction works			
Construction operations	**Extent**	**Duration of construction works**	**Level of effect (adverse)**
Site access and haulage routes.	Local – Ashlawn Road will be the main site entrance. The entrance is narrow, so visibility will be restricted. Site traffic will cause some disturbance, dust and noise affecting Ashlawn Cottage, The Bungalow and Ashlawn House. However, the mature trees offer a level of screening. Traffic may be slowed up on Ashlawn Road during deliveries.	Medium term	Moderate
Excavation of new foundations.	Local – Screened by hoardings. Disturbance, noise, dust.	Short term	Moderate
Fixed construction plant, including cranes, scaffolding and gantries.	Local – The higher construction plant may be perceptible and change the local landscape character of the mainly low rise residential areas.	Medium term	Moderate
Construction of building.	Local - The housing comprises bungalows on the edges of the development and 2-storey units in the interior, so the visual exposure will be limited. There will be disturbance, noise and dust.	Medium term	Slight
Hard and soft landscape works.	Local – Public realm works along Ashlawn Road to create the vehicular/pedestrian entrance to the east and pedestrian entrance to the west of the Application Site.	Short term	Moderate

Construction phase

3.1.7 The landscape impacts will be local with the greatest impact on the residents of Ashlawn Cottage, The Bungalow and Ashlawn House. The fixed construction plant including cranes, may be perceptible and so introduce a temporary change to the local landscape character. However, the construction of Ashlawn Gardens and Inwoods Park, which are in close proximity to the Application Site, will lessen the sensitivity of the receptors.

3.1.8 The pedestrians on Ashlawn Road will have filtered views of the construction works. Residents

in close proximity to the proposals in Ashlawn Cottage, The Bungalow and Ashlawn House will have fuller views of the construction works along with disturbance, dust and noise. Further afield the effects of construction works will be largely imperceptible and most likely will be seen in the context of the existing construction works on several adjacent sites. The road/entrance works, hard and soft landscaping will have a **moderate adverse short term** impact on residents in close proximity and pedestrians.

3.1.9 The results of the site visit indicate that the Application Site is very well enclosed and areas with gaps in the hedgerows will be strengthened with appropriate planting. While construction generally has an adverse impact, there are few receptors apart from Ashlawn Cottage, The Bungalow and Ashlawn House who will be **moderately adversely** affected by the construction works.

3.1.10 In the wider townscape the effects will be imperceptible.

3.2 Landscape Effects (on completion)

Application Site

3.2.1 Any assessment must be measured against the current situation on site, which is grazing land with mature trees in a parkland character setting. The proposed development will result in major changes to the site character due to the change of use from grazing land to a residential estate, which would generally be considered as having a major adverse effect on the character of a greenfield site.

3.2.2 However, the townscape/landscape to the north and shortly to the west with Inwoods Park, are of high-end detached and semi-detached housing and the proposed development conforms to the style, materials and height of these estates.

3.2.3 The effects on the character area are "*well framed and enclosed*" and the potential for housing development is outlined in the Rainsbrook Valley Landscape Sensitivity Study as follows: "*There is scope for limited development but this should not extend into neighbouring zones. The existing landscape structure with mature trees must be retained*."

3.2.4 The development is retaining the mature trees, apart from one to allow entrance/ingress to the site. The housing is confined to the northern area of the site with the southern end retaining and enhancing the parkland features and increasing the biodiversity through additional tree planting and pond creation.

Ashlawn Road

3.2.5 The Application Site is relatively disconnected in both visual and perceptual terms from Ashlawn Road, which is a busy road serving as a ring road around the southern edge of Rugby. Ashlawn Gardens opposite the Application Site is prominent from Ashlawn Road, however, whilst the entrance to the site is formally marked, there are only filtered views through the mature trees to the site. Once on the site the containment by the vegetated boundaries reduces the perception of the traffic noise and the wider area.

Rugby

3.2.6 The Application Site is not covered by any statutory designations at national or local level.

There is a Drinking Water Safeguard Zone (Surface) Water, non statutory designation, over the majority of the site. Defra's Magic Map also indicates that the site is a Wood pasture and Parkland BAP Priority Habitat. Ashlawn House is mentioned in the HLC as one of the smaller designed parks associated with small country houses (p.263).

3.2.7 The Application Site does not lie within a housing Allocated Site, however, the Rainsbrook Valley Landscape Sensitivity Study written by WCC Landscape Architects does indicate *"There is scope for limited development but this should not extend into neighbouring zones. The existing landscape structure with mature trees must be retained."* While the Application Site is also part of zone 14d, the housing of the proposed development is confined to the northern area of the site with the southern area retaining and enhancing the parkland features and increasing the biodiversity through additional tree planting and pond creation, all designed to increase biodiversity and link into the broader green infrastructure.

3.2.8 In addition to the viewpoints outlined in the Visual Impact Assessment of this report, the site survey covered the area to the south west of the site around Dunchurch including Cock Robin Wood, Dunchurch Sports village hall on Rugby Road and Bilton Grange School. Visibility of the site is confined to filtered views from Ashlawn Road. This is confirmed in the Viewshed. **See Appendix 1.** The only visibility within the wider area is to the south of the site where there are views across the Rainsbrook Valley. There are few views looking into the site from the south as the land falls steeps from 111m to 83m at the M45 and the land comprises large scale agricultural fields with few, if any receptors who would perceive of a change in the view.

National Character Area 96 – Dunsmore and Feldon

3.2.9 The Application Site and wider area conform to the key characteristics within the NCA 96. The proposed development will contribute to the objectives of this character area by conserving and enhancing the field boundary features, increasing the native broadleaves between the housing and in the southern area of the site where the character of the area will conform to park estate land. The proposals will increase the extent of the habitat connectivity and biodiversity on the site.

3.3 Visual Impact Assessment

3.3.1 The following section summarises the existing setting and likely or anticipated effects from twelve representational viewpoints. To demonstrate site visibility and impacts, viewpoints were selected within publicly accessible areas based on the following criteria:

- Site investigation to establish locations where there were likely to be significant views and
- Identifying those locations where there was likely to be a significant number of visual receptors, for example main roads, residential areas and public rights of way.

3.3.2 The photographs were taken on 1st August 2025 when vegetation is in full leaf. It should be noted that views of the proposed development are likely to be less filtered during the winter months. Conditions were generally dry but overcast. Photographs were taken with a Panasonic Lumix DMC TZ80 digital camera and conform to the Landscape Institute's Technical Guidance Note 09/19. The height of the camera was approximately 1.5m.

3.3.3 Twelve representative viewpoints were selected at the locations identified below. These are shown graphically in **Appendix 1**, along with a rough map of the route taken to investigate the area.

Viewpoint	Location
Viewpoint 1:	Entrance on Ashlawn Road
Viewpoint 2:	Ashlawn Road
Viewpoint 3:	Off Ashlawn Road
Viewpoint 4:	Onley Lane
Viewpoint 5:	Bridleway R177 running south from Ashlawn Road
Viewpoint 6:	Bridleway R177
Viewpoint 7:	Ashlawn Road
Viewpoint 8:	Magenta Close
Viewpoint 9:	Spectrum Avenue
Viewpoint 10:	Bridleway running north from Ashlawn Road
Viewpoint 11:	Vermilion Way
Viewpoint 12:	Footpath to the east of Ashlawn Gardens

3.3.4 ZTV mapping was generated in QGIS 3.34 using the Viewshed tool based on a building height of 10m at the centre of the site. The viewshed displays where there is theoretical visibility of the proposed development based on a Digital Surface Model (Digital Surface Model (DSM), 1m grid) which takes into account buildings, trees and hedgerows. **See Appendix 1.** It should be noted that when the DSM was generated Ashlawn Gardens was not built, consequently the Viewshed indicates that there is visibility of the proposed development to the north west of the site. However, Viewpoints 11 and 12 indicate that there would be no visibility of the proposed development due to the built form and mature trees.

3.3.5 The Viewshed indicates visibility from the north west section of a field adjacent to the roundabout that gives access to Spectrum Avenue on the new housing estate. There is no public access to this field and no visibility from Viewpoints 5 and 6 on the bridleway nor indicated on the Viewshed.

3.3.6 The visibility indicated on the Viewshed to the south west is from agricultural fields to the M45, with no public access.

3.3.7 The viewshed indicates that views of the proposed development are very limited. Intervisibility with the site context is largely limited by the boundary vegetation, woodlands, hedgerows and tree belts in the landscape, topography and built form in Ashlawn Gardens.

3.3.8 The following section summarises the existing setting and likely or anticipated effects on the twelve no representational viewpoints and wider area.

Viewpoint 1: Entrance to Application Site and Ashlawn House and with a partial view of The Lodge.



Viewpoint Address or Location	**View from Ashlawn Road looking south east**	**Distance to boundary of proposed development**	**On boundary at entrance driveway**	**Grid Reference**	**SP506725**
Viewpoint Baseline	Mature trees and walled entrance on the boundary to the Application Site looking south-east. The Lodge is just visible to the right of the photograph. The driveway is lined with beech 2.5m hedgerows, which run north-south through the centre of the site to Ashlawn House. It is proposed to retain the hedgerows and drive to give vehicular and pedestrian access to the Lodge, Ashlawn Cottage and Ashlawn House, all of which are outside of the site boundary.				
Receptors	Pedestrians and car drivers on Ashlawn Road, local residents in the Lodge. Residents in Ashlawn Gardens living opposite the entrance will also have some visibility although these will be filtered by the mature planting along Ashlawn Road.				
Viewpoint Sensitivity	Low: Road users, cyclists, pedestrians on Ashlawn Road - The proposed development is set well back from Ashlawn Road with a 1.5m pedestrian path, grassed verge and area with a shallow ditch, dense vegetation and mature trees. This runs along the full extent of the northern boundary of the site, except for a conifer hedgerow bordering the gatehouse. The proposed development will generally be well screened from pedestrians, cyclists and road users, who will experience partial glimpses through gaps in the vegetation for a short period of time. The receptors are likely to be somewhat desensitised by the proposed development, which is an extension of the rapid growth of housing in the area, in particular Ashlawn Gardens opposite and Inwoods Park, in the process of development in the adjacent field. This assessment accords with the latest Rainsbrook Valley Landscape Sensitivity Study which assessed the visual sensitivity of the proposed housing on the Application Site as low due to the sense of enclosure assessed as '*Framed to enclosed'*.				
Magnitude	Negligible				
Predicted Change	There will be little perception of any change from this viewpoint as this entrance and drive will remain as access to the Lodge, Ashlawn Cottage and Ashlawn House, which are outside the site boundary. The proposed development will be screened by the two tall hedgerows running through the centre of the site and the robust mature trees and vegetation to the north of the				

	site running along Ashlawn Road. Access to the proposed development is at the existing field gates to the east and west fields off Ashlawn Road.
Level of effect:	Negligible: This entrance and drive will remain as access to The Bungalow, Ashlawn Cottage and Ashlawn House. The proposed development is set well back from Ashlawn Road and there will be little change to the existing view due to the enclosed nature of the site.

Viewpoint 2: Ashlawn Road



Viewpoint Address or Location	**Ashlawn Road at field gate to the east of the Application Site**	**Distance to boundary of proposed development**	**At edge of site**	**Grid Reference**	**SP507726**
Viewpoint Baseline	In the foreground is the field gate on Ashlawn Road, with the wire picket fence bordering the northern edge of the east field of the Application Site. The viewpoint gives long views into the east field with the mature parkland trees visible in the middle and far distance. Ashlawn House can be partially glimpsed through the mature Tilia in the far distance that provide some measure of separation between Ashlawn House and the field that is used for grazing. This access gate is situated alongside a substation and Ashlawn Cottage as indicated in **Viewpoint 2a** below. On the opposite side of Ashlawn Road, is a footpath running along the eastern edge of the Ashlawn Gardens development.				
Receptors	The receptors will be pedestrians, car drivers and cyclists on Ashlawn Road, residents in Ashlawn Cottage and pedestrians on the Ashlawn Gardens footpath opposite.				
Viewpoint Sensitivity	Low: Road users, cyclists and pedestrians will glimpse a small area of the proposed development for a short time. High: Residents in Ashlawn Cottage will be aware of the cars driving into the main access to the proposed development. The dwellings are set back from Ashlawn Cottage with intervening vegetation.				
Magnitude	Moderate: It is proposed that construction traffic will use the access at the existing field gate on Ashlawn Road, which will ultimately be the vehicular and pedestrian entrance to the site. This will necessitate the removal of one of the trees, which currently form a group. Slight: the proposed development is extending the residential development into a green field and will cause a partial deterioration to a small proportion of the existing view. The Cottage is set at an oblique angle to the housing but there will be partial glimpses of the houses/bungalows on the east side of the development from the cottage and also from the rear garden as indicated in **Photo 2b.**				
Predicted Change	This field gate will be the main vehicular access to the proposed development, which will necessitate widening the entrance to provide a roadway with pedestrian paths and the removal of existing vegetation. The proposed development will be a new feature partially visible in the middle distance from this viewpoint. However, it will be a minor component in the view, as the majority of Ashlawn Road is well contained by mature trees and vegetation.				
Level of effect:	Slight adverse: This is not a local view of importance, nor is it at odds with the large residential development, Ashlawn Gardens, on the opposite side of the road. There are a number of trees between the cottage and the entrance and filling in				

	gaps in the hedgerow on the eastern boundary of the east field will largely mitigate against the impact on Ashlawn Cottage.

Viewpoint 2a: Ashlawn Cottage with the field access gate to the right of the panorama



Viewpoint 2b: View from the east field of the Application Site to the rear of Ashlawn Cottage



Viewpoint 3 Track off Ashlawn Road leading to Hall Cross



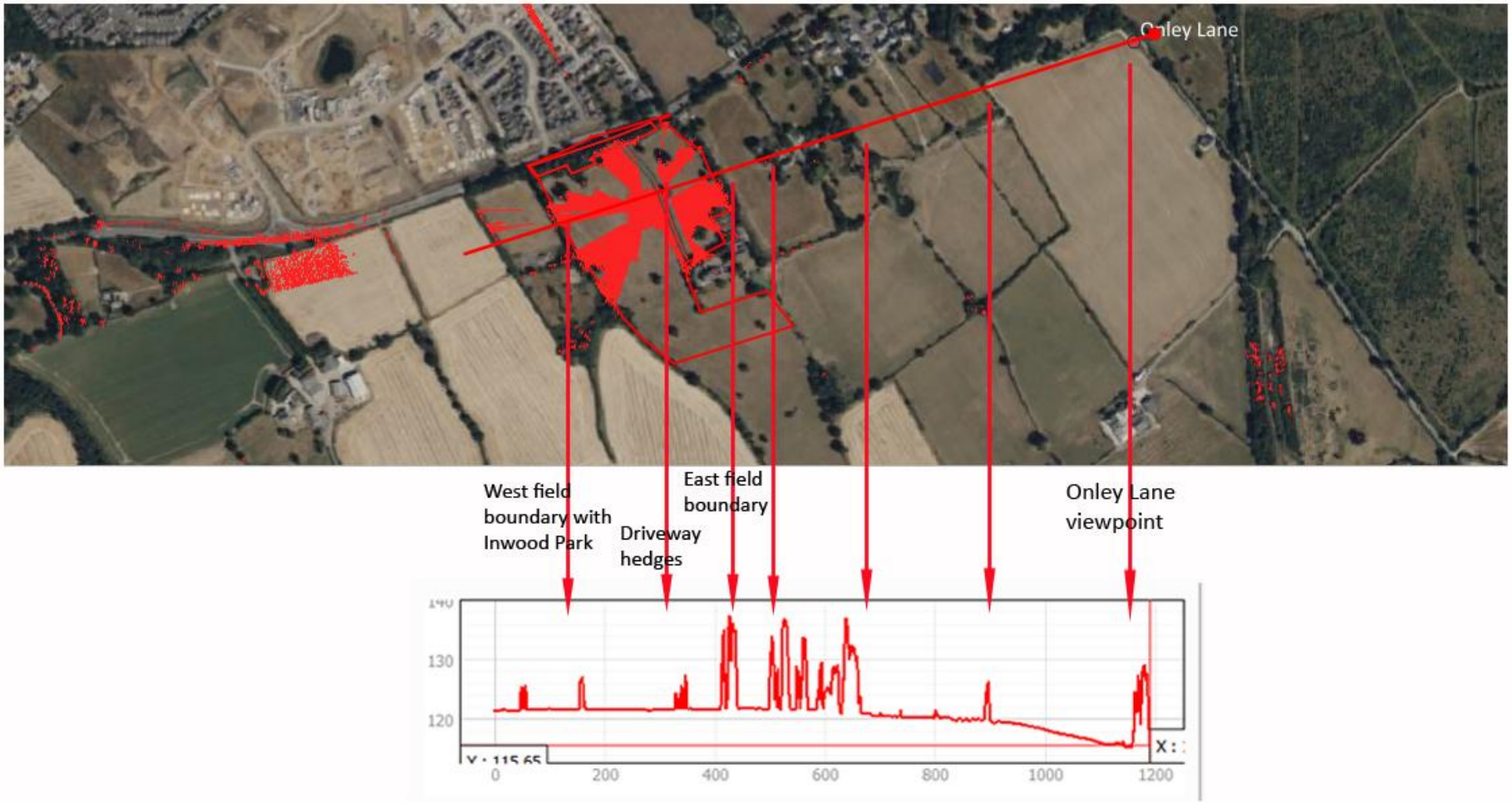
Viewpoint Address or Location	**Vehicle track leading to Hall Cross looking south west**	**Distance to boundary of proposed development**	**134m**	**Grid Reference**	**SP508726**
Viewpoint Baseline	This photograph is taken on the vehicular track leading to Hall Cross, the outbuildings of which are just visible in the middle distance through the trees. Hall Cross is located in a well maintained rectangular field adjacent to the east field of the Application Site. The site boundary of the east field of the Application Site in the middle distance is well contained with mature trees. A very narrow view of The Bungalow, located alongside Ashlawn House outside of the site boundary of the Application Site, is visible between the trees as indicated in the photograph.				
Receptors	Residents and visitors to Hall Cross.				
Viewpoint Sensitivity	Low				
Magnitude	None				
Predicted Change	None				
Level of effect:	None/Negligible - The mature trees screen the site and any changes are unlikely to be perceived. Views during the winter months will be filtered with negligible effect.				

Viewpoint 4: Onley Lane



Viewpoint Address or Location	**Onley Lane looking south west**	**Distance to boundary of proposed development**	**727m**	**Grid Reference**	**SP14727**
Viewpoint Baseline	This viewpoint was taken at a field gate and pedestrian track that borders the southern edge of the Rugby Model Engineering Society Ltd. and the Rainsbrook Valley Railway. This view looks across the railway site which is well screened with large stands of mature trees. The weather was a little overcast, however, there is no visibility at this point of the Application Site due to intervening mature trees and vegetation. This is illustrated graphically with an elevation profile. **See Figure 16**.				
Receptors	Road users, cyclists, farm workers, pedestrians				
Viewpoint Sensitivity	Low – Onley Lane is a quiet lane, with few pedestrians and little residential development.				
Magnitude	None				
Predicted Change	None				
Level of effect:	The mature trees and the landform screen the site and any changes are unlikely to be perceived.				

Figure 16: Elevation profile showing buildings, trees and infrastructure between Onley Lane and the Application Site



Elevation Profile using QGIS 3.34, with 1m Digital Surface Model. This indicates the lower elevation and the mature tree stands between the viewpoint on Onley Lane and the Application Site, which will screen visibility of the proposed development.

Viewpoint 5: Bridleway (PRoW R177) to the west of the Application Site



Viewpoint Address or Location	**Bridleway to the west of the Application Site looking east.**	**Distance to boundary of proposed development**	**282m**	**Grid Reference**	**SP504720**
Viewpoint Baseline	This photograph was taken on the bridleway (R177) west of the Application Site between the Inwoods Park development to the east and Inwoods Farm to the west. It runs from Ashlawn Road, south to Rains Brook and beyond, over the M45. The well maintained hedgerow in the middle distance borders the western boundary of the Inwoods Park development site. Beyond this are mature trees bordering the west field of the Application Site.				
Receptors	Pedestrians.				
Viewpoint Sensitivity	High				
Magnitude	None				
Predicted Change	None				
Level of effect:	None - The mature trees and hedgerow screen the site and any changes are unlikely to be perceived. Once constructed the Inwoods Park development will lie between this view and the proposed development.				

Viewpoint 6: Bridleway to the west of the Application Site



Viewpoint Address or Location	**Bridleway to the west of the Application Site looking north east.**	**Distance to boundary of proposed development**	**313m**	**Grid Reference**	**SP503722**
Viewpoint Baseline	The photograph is taken further south on the public bridleway, (R177). The view is dominated by the agricultural field in the foreground and the mature trees on the western boundary of the Application Site, in the middle distance. The bridleway at this point slopes down from Ashlawn Road by approximately 15m. It is also at a lower elevation than the nearest point on the Application Site by approximately 11m. In the middle/far distance the roof and square turret of Ashlawn House are just visible through a gap in the trees.				
Receptors	Pedestrians.				
Viewpoint Sensitivity	High				
Magnitude	None				
Predicted Change	None				
Level of effect:	None: There is a glimpse of the roof of Ashlawn House, however, the topography, intervening trees and vegetation will screen any views of the proposed development and any changes are unlikely to be perceived. Once constructed the Inwoods Park development will lie between this view and the proposed development.				

Viewpoint 7: Ashlawn Road



Viewpoint Address or Location	**Ashlawn Road opposite field gate to west field of Application Site**	**Distance to boundary of proposed development**	**27m**	**Grid Reference**	**SP50462**
Viewpoint Baseline	The photograph is taken from the edge of Ashlawn Gardens on Ashlawn Road. The entrance to the 3.3 hectare Inwoods Park residential development is prominent in the view, with the field gate to the west field of the Application Site set well back from the road.				
Receptors	The receptors will include pedestrians, cyclists and car drivers on Ashlawn Road.				
Viewpoint Sensitivity	Low				
Magnitude	Negligible: There is no visibility of the Application Site due to the intervening mature trees and vegetation.				
Predicted Change	This field gate will be a pedestrian entrance to the west field of the proposed development. The entrance is set well back from Ashlawn Road and will require clearance of vegetation to create a path but is unlikely to necessitate any tree removal.				
Level of effect:	Negligible – with mitigation in the form of appropriate planting, glimpses of the proposed development are unlikely to be visible from this pedestrian entrance to the proposed development and would only be a minor component in the view.				

Viewpoint: 8 Magenta CLose



Viewpoint Address or Location	**Magenta Close looking south east**	**Distance to boundary of proposed development**	**19m**	**Grid Reference**	**SP505726**
Viewpoint Baseline	This panorama is taken on the hammerhead drive of Magenta Close looking across the grassed area and swale of Ashlawn Gardens. The Lodge at the entrance to Ashlawn House is partially screened by the conifer hedge. There are glimpses through the trees of the west field of the Application Site and the hills in the far distance.				
Receptors	Pedestrians, cyclists and car drivers on Ashlawn Road. The residents on Magenta Close are at an oblique angle to Ashlawn Road, and are set well back with an intervening road, planted grassed area, swale and the busy Ashlawn Road. There are glimpses through the mature trees on the northern boundary of the west.				
Viewpoint Sensitivity	Low				
Magnitude	Negligible.				
Predicted Change	The housing to the north of the west field is set between 40m and from Ashlawn Road, which together with the existing mature trees and vegetation along with mitigation would screen the new development from this view.				
Level of effect:	None/Negligible - The mature trees screen the site and any changes are unlikely to be perceived. Views during the winter months will be filtered with negligible effect particularly after mitigation.				

Viewpoint 9: Spectrum Avenue



Viewpoint Address or Location	**Spectrum Avenue looking south east**	**Distance to boundary of proposed development**	**25m**	**Grid Reference**	**SP505725**
Viewpoint Baseline	This photograph is taken on Spectrum Avenue looking across Ashlawn Road to the west field of the Application Site. Spectrum Avenue is the only vehicular entrance and spine road through Ashlawn Gardens from Ashlawn Road running to the roundabout at the west end of Ashlawn Gardens. Car drivers will have direct views of the tree lined northern boundary of the west field as they exit Ashlawn Gardens. The Application Site is well screened by mature trees and vegetation at this viewpoint.				
Receptors	Pedestrians, cyclists and car drivers on Ashlawn Road. Some of the residents on Spectrum Avenue face the Application Site, however, they are set well back with an intervening road, planted grassed area, swale and the busy Ashlawn Road. In addition, the planting on the northern boundary is particularly dense at this viewpoint screening any potential views of the proposed development.				
Viewpoint Sensitivity	Low				
Magnitude	None				
Predicted Change	The mature trees on the northern boundary will largely screen the proposed development, which is set back from Ashlawn Road.				
Level of effect:	None/Negligible - At this location any changes brought about by the proposed development will not be perceptible to the visual receptors. Views during the winter months will be filtered with negligible effect particularly after mitigation.				

Viewpoint 10: Bridleway off Ashlawn Road



Viewpoint Address or Location	**Bridleway running north from Ashlawn Road looking south east**	**Distance to boundary of proposed development**	**25m**	**Grid Reference**	**SP503724**
Viewpoint Baseline	This photograph is taken on the continuation of the bridleway in viewpoints 5 and 6 and heads north from Ashlawn Road through Ashlawn Gardens to Spectrum Avenue and through the estate to St Philips Badminton Club, the Stagecoach Performing Arts centre and Rokeby playing field. The foreground and middle ground in the photograph show the enclosed swale bordering Ashlawn Road. The Inwoods development in the process of construction is just visible on the opposite side of Ashlawn Road to the right of the photograph. Beyond this is the boundary to the west field of the Application Site. The Application Site is not visible due to the distance, planting and angle of view.				
Receptors	Pedestrians, cyclists and car drivers on Ashlawn Road. Some of the residents face the Application Site, however, they are set well back with an intervening road, planted grassed area, swale and the busy Ashlawn Road.				
Viewpoint Sensitivity	Low				
Magnitude	None				
Predicted Change	The planting on the northern boundary of the Application Site is particularly dense, screening any potential views of the proposed development from this angle.				
Level of effect:	None - At this location any changes brought about by the proposed development will not be perceptible to the visual receptors.				

Viewpoint 11: Vermilion Way



Viewpoint Address or Location	**Vermilion Way on the bridleway to the north of the site**	**Distance to boundary of proposed development**	**362m**	**Grid Reference**	**SP502728**
Viewpoint Baseline	This photograph is taken on the continuation of the bridleway noted in viewpoint 10 that heads north from Ashlawn Road through Ashlawn Gardens, part of which was still under construction at the time of the site visit. The bridleway is in the foreground to the right of the photograph. The houses in the middle distance are on Spectrum Avenue and the tree tops in the far distance are on the northern boundary of the Application Site. There is no visibility of the Application Site from this viewpoint due to the built form, which will increase once the construction is completed.				
Receptors	Residents and visitors to Ashlawn Gardens. Pedestrians walking between the established residential area of Rugby and areas to the south of Ashlawn Road.				
Viewpoint Sensitivity	Low				
Magnitude	None				
Predicted Change	None				
Level of effect:	None - The buildings will preclude any visibility of the proposed development. The visibility will be less once construction is completed.				

Viewpoint 12: Footpath to the east of Ashlawn Gardens looking south



Viewpoint Address or Location	**Footpath to the east of Ashlawn Gardens, off Celadon Road looking south**	**Distance to boundary of proposed development**	**144m**	**Grid Reference**	**SP506727**
Viewpoint Baseline	This photograph is taken on a newly created footpath that heads north from Ashlawn Road along the eastern edge of Ashlawn Gardens and circumvents the north of the development crossing the bridleway, exiting to Norton Leys on the established residential area to the north of Ashlawn Gardens. To the left of the photograph are trees bordering a field beyond which is the Ashlawn Water Tower. Beyond the housing in the middle distance are mature trees bordering Ashlawn Road. There is no visibility of the Application Site from this viewpoint due to the built form and mature trees.				
Receptors	Residents and visitors to Ashlawn Gardens. Pedestrians walking between the established residential area of Rugby and areas to the south of Ashlawn Road.				
Viewpoint Sensitivity	Low				
Magnitude	None				
Predicted Change	None				
Level of effect:	None - housing and mature trees at the eastern corner of Ashlawn Gardens will block views of the proposed development.				

Summary

Viewpoint		Sensitivity	Magnitude	Level of effect
Viewpoint 1:	Entrance on Ashlawn Road	Low	Negligible	Negligible
Viewpoint 2:	Ashlawn Road	Low	Slight	Slight adverse
Viewpoint 3:	Off Ashlawn Road	Low	None	None
Viewpoint 4:	Onley Lane	Low	None	None
Viewpoint 5:	Bridleway R177 running south from Ashlawn Road	Low	None	None
Viewpoint 6:	Bridleway R177	Low	None	None
Viewpoint 7:	Ashlawn Road	Low	Negligible	Negligible
Viewpoint 8:	Magenta Close	Low	Negligible	Negligible
Viewpoint 9:	Spectrum Avenue	Low	None	None
Viewpoint 10:	Bridleway running north from Ashlawn Road	Low	None	None
Viewpoint 11:	Vermilion Way	Low	None	None
Viewpoint 12:	Footpath to the east of Ashlawn Gardens	Low	None	None

3.3.10 The following conclusions on the visual impact of the proposed development can be summarised:

Residents

3.3.11 The proposed development will have sufficient screening on its northern boundary and Ashlawn Road is broad enough with Ashlawn Gardens well set back to avoid any adverse visual impact on residents in Ashlawn Gardens. See Viewpoints 8 and 10. There are no open views to the site from adjacent properties. However, Ashlawn Cottage lies just outside of the boundary to the east field and there will be filtered views to the housing proposed to the east of the vehicular entrance, from the top storey of Ashlawn Cottage and the rear garden. **See Viewpoints 2a and 2b**. Strengthening of the eastern boundary will limit these views. Ashlawn House and The Bungalow will have some level of separation as they have mature planting on their boundaries and will be adjacent to the open field area with a SUDs pond and tree planting.

3.3.12 There was no visibility of the proposed development from the small developments to the east of the site off Ashlawn Road: Hall Cross, see **Viewpoint 3**. There is no visibility from Gorse Farm Close, a small residential development of high end homes, due to tall, mature trees screening views to the south west of the viewpoint.

Pedestrians and cyclists

3.3.13 Existing views from Ashlawn Road are well filtered by the mature vegetation along the northern boundary, with periodic opportunities for glimpses into the site where there are some localised gaps/thinning of vegetation. Views will be less filtered during the winter months.

3.3.14 The majority of the PRoWs within the local landscape are well screened by the frequent mature trees on the field boundaries, topographical change and built form. The hedgerow and matures trees screen visibility from the bridleway west of the Application Site at **Viewpoint 5.** The path slopes down as it approaches Rains Brook, and at **Viewpoint 6** only the roof and turret of Ashlawn House are visible through a narrow gap in the treeline. The contour of the land as the bridleway drops in elevation from Viewpoint 6 screens any possibility of visibility further south. There is no visibility from the new footpath to the east of the site due to the housing and mature trees, see **Viewpoint 12.** The mature trees to the north of the Application Site screen visibility from the bridleway, west of the site on Ashlawn Road (**Viewpoint 10**). Housing, some in the process of construction, blocks the views further north on the Ashlawn Gardens development, see **Viewpoint 11.** Similarly, housing and mature trees at the eastern corner of Ashlawn Gardens will block views of the proposed development, **see Viewpoint 12**.

3.3.15 Great Central Walk is a public path (also part is a Sustrans Cycle Track) that follows the route of the former Great Central Railway line. Ashlawn Cutting is a nature reserve and a specific area along the Great Central Walk characterised by the deep cutting created for the railway. The Cutting is set at a low elevation with no visibility of the surrounding area and Great Central Walk is enclosed by dense foliage on its boundaries, as indicated in **Photo 7**, which was taken just off Onley Lane.

3.3.16 Visibility beyond the Great Central Railway and Ashlawn Cutting to the east is screened by the topography but largely the dense vegetation on these public paths. This applies to views from Onley Lane as indicated in **Viewpoint 4**. It has few receptors as it is a quiet lane with little residential development. Investigations were carried out further east on Barby Lane, which runs from the residential area of Hillmorton to just beyond the M45. It is at a lower elevation than the Application Site with no visibility where Barby Lane crosses the Oxford Canal due to distance, 3km, and intervening vegetation. Investigations were also carried out off Barby Lane on a footpath opposite Rainsbrook Wood by Rains Brook. However, again visibility is screened by the topography and the intervening vegetation.

Photo 7: View of Great Central Walk taken just off Onley Lane



Road users

3.3.17 There are filtered views for road users travelling along Ashlawn Road, particularly at the field gate to the east. However, this is a fast road and glimpses will be fleeting. Car drivers will have direct views of the tree lined northern boundary of the west field as they exit Ashlawn Gardens. The Application Site is well screened by mature trees and vegetation at this viewpoint.

Meeting places

3.3.18 Ashlawn Crematorium is located 1.1km to the east of the Application Site and bordering the

Ashlawn Cutting, a Local Nature Reserve, and Great Central Way, a route of the last mainline railway. There is no visibility of the site from the Crematorium as it is at a lower elevation than the Application Site and screened by the mature, dense vegetation on the Great Central Walk

Summary

3.3.19 Visibility southward towards the Application Site from Ashlawn Road and from Ashlawn Gardens is limited by the mature vegetation on the northern boundary of the site and from the built form on Ashlawn Gardens, which is still in the process of construction. The south of the Application Site gives wide views over the Rains Brook Valley, which largely comprises large scale agricultural fields, with no residencies and consequently few receptors. Views from the bridleways to the west and east are curtailed by the changes in topography as well as vegetation. Views from the west around Dunchurch, Bilton Grange and Cock Robin Wood were investigated, however, the proposed development is unlikely to be perceptible due to intervening vegetation. Similarly, the proposed development will be imperceptible in views from the small residential clusters around Hall Cross, and Gorse Farm Close east of the site. Further east, views from the crematorium, the southern end of Onley Lane and Barby Lane will be imperceptible due to the landform and the dense vegetation on the Great Central Railway and Ashlawn Cutting.

Cumulative Effects

3.3.20 Cumulative landscape and visual effects arise through the combined effects of a proposed development alongside existing or planned developments. These effects can be visual, where multiple developments are visible from a single viewpoint, or sequential where different viewpoints are needed to see each development.

3.3.21 The proposed development is well contained and will not be seen in the context of the large development of Ashlawn Gardens. Inwoods Park has a similar level of containment from Ashlawn Road, so it is unlikely that there will be combined visibility or a sequential effects.

3.4 Conclusions

3.4.1 The Application Site comprises a tree lined private drive running in a north to south direction, dividing the 7 hectare site into two fields, excluding Ashlawn House, which lies outside of the redline boundary. The site has parkland features including the mature beech trees lining the driveway, the gatehouse and scattered mature trees in the two fields. Ashlawn House is mentioned in the Warwickshire Historic Landscape Characterisation Report as one of the smaller designed parks associated with small country houses.

3.4.1 The Application Site has a distinctive parkland setting and is assessed as of moderate landscape value and largely low sensitivity. A large area of the site to the south, part of which is assessed as high sensitivity due to views over the Rains Brook Valley, will be exclusively green field comprising a SUDs pond and tree planting, creating new habitats that will replicate the parkland feel that gives the Application Site its quality and value.

3.4.2 The site has a high level of containment and there are good opportunities for mitigation and enhancement. The design has been landscape-led with an emphasis on tree retention, new tree planting and enhancement of grasslands such that the proposed development retains the sites existing parkland character. It accords with the objectives of the NCA 96 Dunsmore and Feldon,

the guidelines of the Rugby Borough LCA, the National Planning Policy Framework and the Rugby Local Plan Preferred Options, all of which state that developments should be sympathetic to local character and history and opportunities taken to maintain and enhance green infrastructure.

3.4.3 The number of visual receptors is largely limited by the boundary vegetation, woodlands, hedgerows and tree belts in the landscape and built form, particularly from the north and west. Receptors comprise principally of pedestrians and residents in close proximity to the site boundary to the north and east.

3.4.4 It is considered that the Application Site and wider area have a good ability to tolerate the nature/scale of the development without any adverse effect on the local or national landscape character. The proposals conform to local and national policies and in conclusion this assessment does not consider that there are any unacceptable or overriding landscape or visual effects that should preclude the proposed development

Arboricultural Impact Assessment

Guided by recommendations within BS5837:2012

Site: Land at Ashlawn House, Ashlawn Road, Rugby, CV22 5QE

Prepared for: [redacted]

Prepared by: [redacted]

Ref: [redacted]

Issue Date: March 2026

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Appendices

A- Tree Survey Schedule and Tree Constraints Plan
B- Tree Protection Plan
C-Tree Works Schedule

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1.0 Summary

1.1 This updated Arboricultural Impact Assessment (AIA) addresses officer comments and will highlight site-specific impacts of the proposed outline planning application on the existing tree stock present at Land at Ashlawn House, Ashlawn Road, Rugby, CV22 5QE. The proposed development includes the construction of 90 dwellings.

1.2 The following drawings have been provided by the client:

- Topographical Survey, reference: 20126-RevB-2d
- Proposed Plans, reference: A-S-P-xx-Site Site Layout 90 Units

1.3 The topographical plan provided has been the base for the tree survey and tree constraints plan. The proposed development plans are available and have been overlaid onto the tree protection plan (TPP).

1.4 This AIA will identify areas of potential conflict between the proposed development or working area of individual trees, tree groups, woodlands and hedges. This AIA will demonstrate which can be retained and which will need to be removed where necessary and ways to mitigate the proposals on the existing trees, tree groups, woodlands or hedges that may be implicated by the proposal or through construction activities to implement the proposal.

1.5 Note: Any mitigating build techniques for working methodologies etc. that are detailed within this assessment must be agreed upon/accepted to ensure that post planning approval and that the tree protection is in place and trees that are detailed for retention are retained and not removed because working practices have not considered the implications on trees.

2.0 Report limitations

2.1 The potential effect of development on trees, whether statutorily protected (e.g. by tree preservation order or by their inclusion within a conservation area) or not, is a material consideration that is taken into account in dealing with planning applications. Greensted Arboricultural Consultancy Ltd have not checked whether trees on site are statutorily protected as this can delay production of the report. The applicant must carry out a statutory tree protection check if you intend to undertake any works prior to formal planning consent being issued.

2.2 All rights in this report are reserved. Its content and format are for the exclusive use of the addressee in dealing with this site. It may not be sold, lent, hired out or divulged to any third party not directly involved in this site without the written consent of Greensted Arboricultural Consultancy Ltd

2.3 This report is restricted to those trees shown on the attached plans and described in the tree survey schedule. All plans and discussions within this report are based entirely on the drawings provided to Greensted Arboricultural Consultancy Ltd at the time of the survey. Any material planning changes after the date of report issue will invalidate this report.

2.4 Greensted Arboricultural Consultancy Ltd have undertaken their tree survey with due care and attention to identify accurately all tree species present at the time of survey. However, where surveys are undertaken when trees are out of leaf, if access is not

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granted or clear, or where insufficiently accurate tree location detail is provided by the client; trees may be grouped, and general tree species composition listed.

2.5 This report does not address matters and should not be used in relation to subsidence or heave caused to any built structure by vegetation present or adjacent to the site.

2.6 Trees are dynamic living organisms, unforeseeable circumstances such as, climate change, weather extremes, criminal or accidental damage (eg: chemical and fire) ground water conditions, were not considered as a part of this Arboricultural impact assessment unless detailed at the time of the survey. Trees can fail without warning, and therefore the author cannot accept liability associated with these factors and for remedial works which have not been undertaken. This report is not a detailed Tree Hazard Assessment report.

2.7 This report may contain comments on subjects which are not arboricultural related. Commenting on such matters is within the scope of the author's experience and the regular scope of this assessment. Any opinion mentioned in this way should be regarded as tentative, and confirmation should be sought from a suitably qualified professional.

2.8 The statements, findings and recommendations made within this report do not take into account any effects of extreme climate and weather incidences, vandalism, changes in the natural and built environment around the tree(s) after the date of this report, nor any damage whether physical, chemical or otherwise. Greensted Arboricultural Consultancy Ltd cannot accept any liability in connection with the above factors, nor where recommended tree management is not carried out in accordance with modern tree health care techniques, within any proposed timeline.

2.9 Due to the above statements, this report remains valid for two years from the date of issue only.

3.0 Report References

This Arboricultural Impact Assessment is informed by reference material, including the following:

- BS 5837: (2012) Trees in relation to Design, Demolition and Construction – Recommendations;
- BS 3998: (2010) Tree Works – Recommendations;
- National Joint Utilities Group (2007) Volume 4, Issue 2: Guidelines for the planning, installation and maintenance of utility apparatus in proximity to trees; DTLR (2001)
- Principles of Tree Hazard Assessment and Management – David Lonsdale

The following drawings and/or reports aided production of this Impact Assessment:

- Existing site layout: Topographical Survey, reference: 20126-RevB-2d
- Proposed site layout: A-S-P-xx-Site Site Layout 90 Units including trees

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4.0 Scope and Purpose of Report

4.1 This AIA considers the implications that the proposed outline planning application for 90 dwellings at Land at Ashlawn House, Ashlawn Road, Rugby, CV22 5QE will have on the existing tree stock, and also provides solutions to any implications where possible, to ensure the safe and healthy retention of any trees which are considered to be worthy of retention should the proposals be put forward for planning permission.

4.2 Rugby Borough Council Draft Local Plan details a proposed Canopy Cover policy (EN5) within the draft Local Plan. Main points from the draft Local Plan have been detailed below.

- A) All major development, excluding development in Rugby town centre, shall increase the post-development canopy cover to at least 20% of the site area (excluding areas of the site that are high or very high distinctiveness habitats)

- B) Where the canopy cover of the site exceeds 20% before development, the proposal should ensure retention of at least the existing level of canopy cover.

- C) In meeting the requirements of this policy, existing canopy should be retained first, before considering new planting.

Proposed tree planting for the site will provide at least a 20% increase in canopy cover, detailed within the draft masterplan.

4.3 This AIA only considers the impacts of the works based off of the drawings which are detailed above. Due to all matters being reserved except access with further changes anticipated, then further advice should be sought.

4.4 This report and all plans appended to it have been formulated using guidance given in the British Standard 5837: 2012 Trees in relation to design, demolition and construction – Recommendations (BS 5837) 2012.

4.5 The tree survey was carried out independently, as far as possible, of the proposed new layout, as recommended in the British Standard.

4.6 The survey contains details of the size, condition and retention category of each tree which may be affected by the proposed development.

4.7 The retention category is derived from the British Standard which allows arboriculturists to place trees in certain bands so that impacts can be appropriately quantified and managed; broadly defined as follows:

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Tree Categorisation Method

a) Category U Trees in such a condition that any value would be lost within 10 years, or should be removed for reasons of sound arboricultural management. There were **13** category U trees (S21, S22, S32, S33, S53, S54, S55, S56, S57, S58, S59, S60, T61) on or adjacent to the site at the time of surveying.

b) Category A Trees of high quality and value: in such a condition as to make a substantial contribution, (40 years or more is recommended). There were **32** individual 'A' grade trees (T3, T4, T5, T6, T7, T8, T10, T11, T12, T13, T14, T17, T18, T20, T23, T25, T26, T30, T31, T34, T36, T37, T38, T39, T40, T42, T43, T44, T45, T62, T64, T65 in total and **2** tree groups (G29, G35) on or adjacent to the site at the time of surveying.

c) Category B Trees of moderate quality and value, capable of making a significant contribution for in excess of 20 years. There were **11** individual 'B' grade trees (T9, T15, T24, T27, T28, T41, T46, T47, T48, T49, T52) in total **2** tree groups (G19 & G50) and 2 hedges (H1 & H2) on or adjacent to the site at the time of surveying.

d) Category C Trees of low quality and value which might remain for a minimum of 10 years or young trees with stems of less than 150mm diameter. There were **2** individual 'C' grade trees (T51 & T63) in total and **1** group (G16) on or adjacent to the site at the time of surveying.

4.8 A tree survey was undertaken by Greensted Arboricultural Consultancy Ltd on the 21st of of May 2025. The tree survey identified 58 individual trees, 5 tree groups and 2 hedges. The tree Survey Schedule and Tree Constraints Plan can be found within Appendix A.

5.0 Methodology

5.1 Each tree was surveyed and given a number corresponding to the provided plan(s) found at Appendix B. For each group or individual information was collected as recommended at 4.4.2.5 of BS 5837. The survey was preliminary in nature and did not involve aerial or detailed inspection. This data is held within the tree schedule which can be found at Appendix A.

5.2 BS5837 recommends that trees within categories A-C (where A is highest quality) are a material consideration in the development process. However, it should be noted that young trees with a stem diameter less than 150mm may be considered for relocation. Category U trees are those that will not be expected to exist for long enough to justify their consideration in the planning process. The A-C categories are combined with the numbers 1, 2 or 3. These numbers signify whether the justification for the category was based on arboricultural, landscape or cultural/conservation values respectively. The tree categories are illustrated on the plans with colour coding. category A trees are light green, category B are mid blue, category C are grey and category U are dark red.

5.3 Where category U trees are notable for their conservation, heritage or landscape value, even though only for the short term, they may be upgraded, although they might be suitable for retention only where issues concerning their safety can be appropriately managed.

5.4 Section 4.6 of BS5837 recommends that the trunk diameter measurement for each tree is used to calculate the root protection area (RPA), which can then be interpreted to

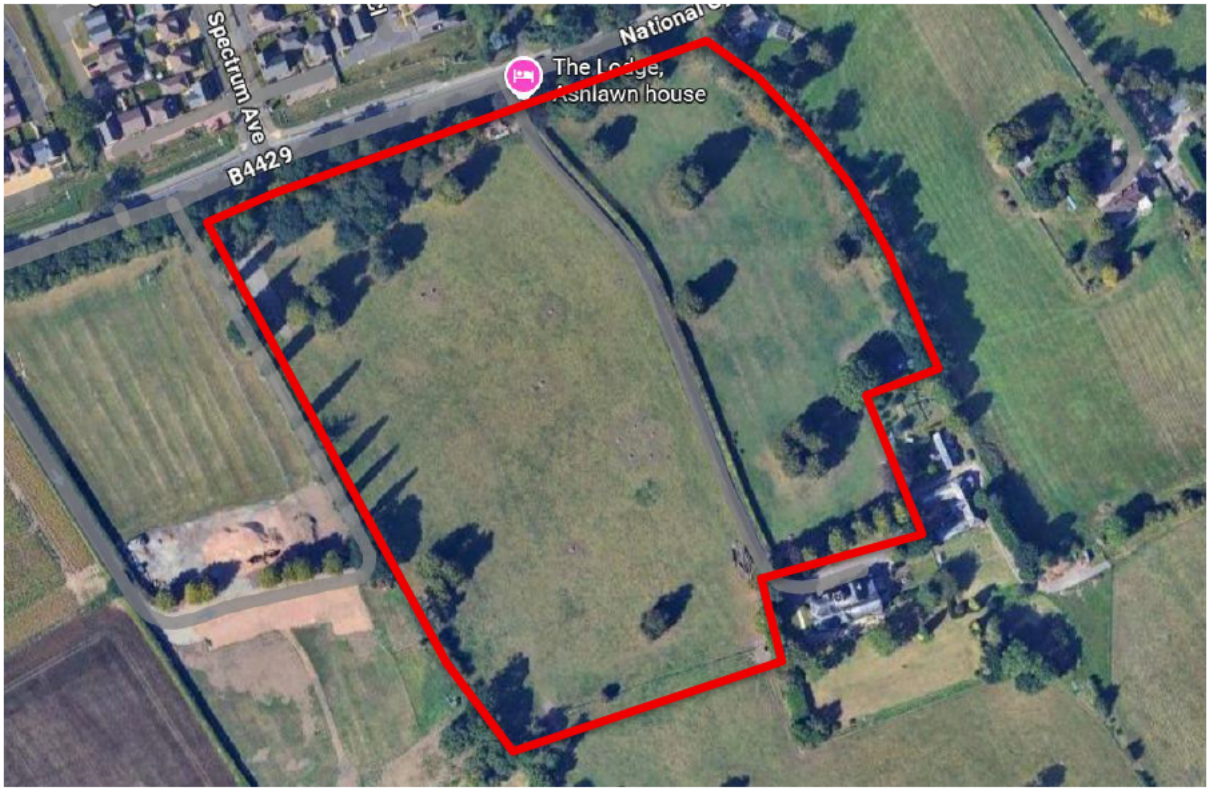
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identify the design constraints and once a layout has been developed to be protected by barriers (tree protection plan (TPP).

5.5 Following inspection and categorisation of the trees, the information listed in Appendix A is used to provide constraints guidance to the project architect based on the locations of the best trees. All U trees are disregarded as they not of sufficient quality to be considered as a material constraint on development.

5.6 The enclosed tree protection plan (TPP) shows the trees proposed for retention, their relevant RPA and provisional positions for protective fencing, ground protection and any specially engineered surfacing.

6.0 The Site



6.1 This aerial image is provided courtesy of Google. The red line indicates the approximate site boundary and is illustrative only.

6.2 The site was visited on 21st of May 2025 by Joseph Beznosiuk. The site is situated on the south-eastern outskirts of Rugby.

6.3 The main arboricultural features within, and adjacent to the site are predominantly scattered collections of category A trees, with larger category A boundary groups fronting Ashlawn Road.

6.4 The British Geological Survey Online Geology Map indicates the soils on site are Charmouth Mudstone Formation. The presence of clay/mudstone indicates that the soil is shrinkable. Trees and other vegetation have the potential to cause damage to structures either directly or indirectly. In such cases, desiccation assessments should be

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carried out at a specialist laboratory to check the extent to which existing vegetation has dehydrated the soil. For further information regarding this please refer too (Annex A BS5837 2012 Trees in Relation to Design, Demolition and Construction.

7.0 Tree Assessment and Impacts

7.1 Greensted Arboricultural Consultancy Ltd undertook a tree survey in accordance with BS5837:2012 on 21st of May 2025 The tree survey identified a total of 58 individual trees, 5 tree groups and 2 hedges. The Tree Survey Schedule and Tree Constraints Plan can be found within Appendix A.

7.2 In accordance with the recommendations contained within BS5837:2012, an experienced arboriculturist has assessed the requirements for tree protection and the root protection area (RPA), Appendix B. The impacts of the proposed development have been detailed below, along with any mitigating measures to ensure the retention of these trees.

7.3 As part of the assessment, dimensions have been scaled from the topographical survey which have been prepared and modified, to include the relevant Tree Survey data and the information as shown on, tree protection plan (TPP), Appendix B. The proposed development plans have been overlaid onto the tree protection plan (TPP) which is annotated to indicate anticipated arboricultural implications.

7.4 One tree forming part of G29 will require removal to form a new vehicular access and part of two moderate value hedges (H1 & H2) require removal to create vehicular and pedestrian access across the site. Whilst regrettable, these losses are considered to have a minor impact on wider amenity and will be mitigated through tree retention and potential new planting within the landscape phase.

7.5 Tree protective fencing has been aligned on the tree protection plan (TPP) Appendix B with the existing root protection areas (RPA's) of the trees present on site where possible. Tree protective fencing has been adjusted where new surfacing/structures are proposed and reduced-dig surfacing or root pruning is specified accordingly. This will affect seven trees and part of one group of trees.

7.6 Proposed reduced-dig surfacing is specified within Inset 1 on the Tree Protection Plan located at Appendix B.

7.7 Existing hard surfacing within the RPA of G35 will be reused as ground protection and/or the existing sub-base will be re-utilised in the formation of an upgraded surface.

7.8 The following summary of implications relates to only those trees which will require mitigation measures to allow for construction operations. Trees and groups not listed below can be fully protected in accordance with BS5837:2012 as indicated on the TPP Appendix B.

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Table 1

British Standard 5837 Category & Reference Number			Impact	Reason	Mitigation
A	**B**	**C**			
Part of G29	Part of H1 & H2	None	Trees to be removed	Building construction and/or proximity	**New planting in landscape phase and/or retained trees.**
T30 & T31	None	None	Trees to be pruned	To crown lift over proposed pathways	**All works to BS 3998.**
T30, T31 & G35	**T28 & T52**	**None**	**RPA disturbance**	**Site access/proposed pathways within the RPA.**	**Protect using special precautions, as indicated within BS5837 2012-section 6.2.3**

8.0 Tree Works

8.1 Two high value trees require minor crown lifting over proposed pathways, but the identified works are considered tolerable due to the tree species identified or minor nature of the works. Furthermore, all works can be undertaken in accordance with the guidance within BS 3998.

8.2 One tree from within the high value group G29 requires removal to form the new access, although the retention of proximal trees within this boundary tree belt will mitigate the loss. Parts of two moderate value hedges on site require removal to create access across the site but these works will have a negligible impact upon local amenity.

9.0 Tree Protection Measures

9.1 Once planning approval has been granted and details to discharge planning conditions have been approved as required then all site operations will be planned, implemented, and supervised to prevent the following unless otherwise agreed within this report:

- Unplanned root severance
- Damage to the bark, branches and trunks
- Compaction of the soil within the Construction Exclusion Zone Construction Exclusion Zone(CEZ)
- Soil level alterations
- Soil contamination by phytotoxic materials such as herbicides, petrol, oils, diesel, cement and concrete washings or other construction additives

Before starting any site works in relation to construction of the proposed stables, tree protection will be installed in accordance with the tree protection plan (TPP), Appendix B.

The establishment of tree protection will occur immediately following the completion of any required tree works and prior to site materials and machinery being brought onto site, and before demolition, development or stripping of soil commences. Barriers may be formed by existing fencing on site or purposely erected barriers that will need to be fit for purpose.

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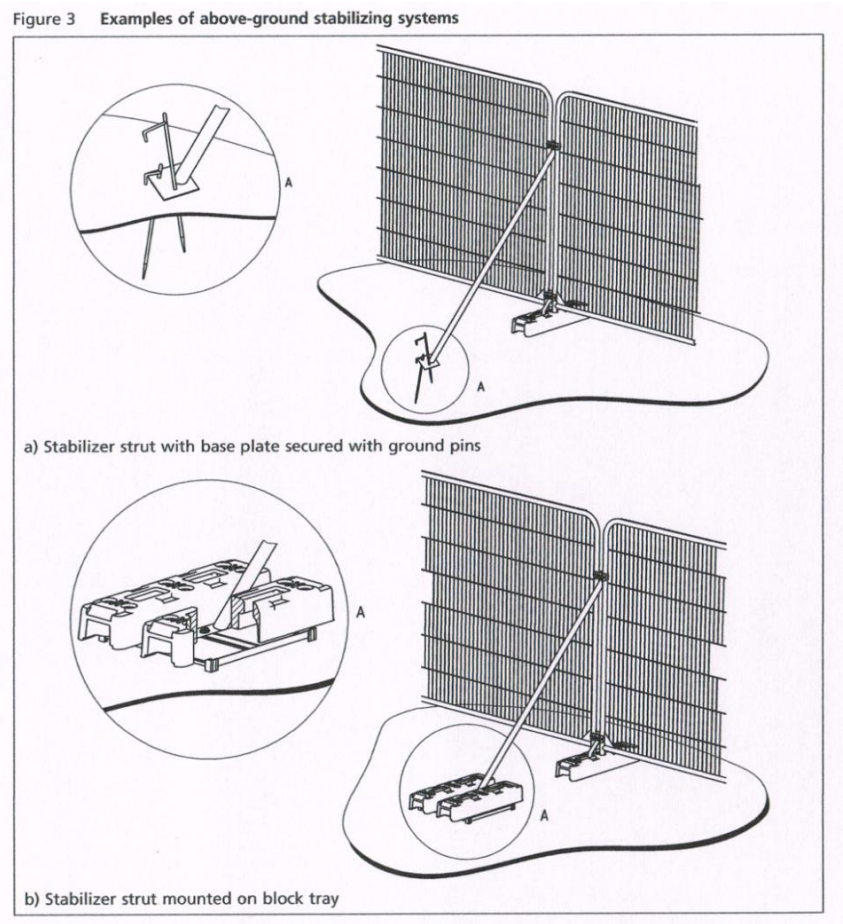
A copy of the Tree Protection Plan TPP (Appendix B) will be kept on site by the client and their appointed contractor. A specific copy will be kept in the site office of the appointed contractor as an immediate reference for all site operatives to review during working processes as required and to reference at the start of each phase or area of works.

The tree protection barrier will follow the standards as set out in BS5837:2012 and as set out on the tree protection plan (Appendix B) to protect the retained trees during site works.

The barrier will consist of weld mesh panels on rubber or concrete feet that are pinned into position with supporting struts. The weld mesh panels will be coupled together with clasps fastened from the inside (see Figure 2).

Tree protection measures will remain in-situ for the duration of the project as per the detail above for phased works. The areas protected by barriers will be regarded as sacrosanct, and the tree protective barriers shall not be taken down or relocated at any time without the prior written approval of the LPA Tree Officer.

Figure 2: Protective barrier principles as recommended by BS5837:2012



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10.0Conclusions

10.1 This Arboricultural Impact Assessment (AIA) is to provide guidance for a proposed outline Planning Application at Land at Ashlawn House, Ashlawn Road, Rugby, CV22 5QE, which includes the construction of 80 dwellings. The tree survey and report has been assessed broadly in accordance with BS5837:2012 “Trees in Relation to Design, Demolition and Construction – Recommendations”.

10.2 This updated assessment and amendments to the proposed layout take into account arboricultural comments received from Rugby Borough Council, specifically:

10.3 The layout has been amended to accommodate the RPA and crown spread of T3, T17 (not T12 as referred to in RBC email), T20, T23, T37, T38, T39, T43, T44 and T45 fully, negating the need for either lateral crown or root reduction.

10.4 The anticipated impact upon T30 and T31 has been reduced to a small section of reduced-dig pathway.

10.5 It is believed that G19 accurately picks up the site constraints posed by trees off the eastern boundary.

10.6 Felled trees indicated by S21,S22,S32, S33,S53,S54,S55,S56,S57,S58,S59,S60 were felled by the landowner in 2020. The loss of S21,S22,S32, S33,S53,S54,S55,S56,S57,S58,S59,S60 have been factored into the Biodiversity Net Gain Metric and in order to satisfy the trading rules has had to be mitigated through the provision of 168 new trees. For more details please see the Biodiversity Net Gain Statement.

10.7 . The landowner has confirmed that the removal of the trees was related to several factors including; removal of dangerous trees, removal of trees that were dead and/or dying due to disease, and for land management purposes (maintenance by the tenant farmer). The landowner did therefore not remove these trees to facilitate development. None of these trees were subject to a Tree Preservation Order.

10.8 From an arboricultural view, it is important to ensure that mature trees are properly protected so that their rooting environment is minimally affected by site works in relation to the stable’s construction. The proposal minimises construction within the RPA’s of retained trees present and highlighted within the tree survey, which are dominant landscape features.

10.9 Two trees require crown lifting; however, it is considered all identified works can be undertaken in accordance with the guidance within BS 3998.

10.10 Reduced dig surfacing is proposed at several locations, and a proposed specification is given.

10.11 Part of one high-value and two moderate-value groups/hedges require removal to facilitate development. However, the impact upon wider amenity is considered minor and restricted to the short term only.

10.12 Provided the recommendations included within this report are strictly adhered to, Greensted Arboricultural Consultancy Ltd believes the trees and tree groups, highlighted for retention within this assessment can be retained without undue stress on their long-term health.

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Appendix A: Tree Survey Schedule and Tree Constraints Plan

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Tree Survey Key

- This tree survey has been carried in line with the recommendations set out in BS5837:2012 and current Arboricultural best practise.
- Each tree has been number, reflected within the tree schedule and relevant plans.
- Height and dimensions are estimated in metres. When requested, accurate heights can be measured using specialist optical equipment.
- Stem diameters have been measured 1.5m from ground level in mm, using a standard measuring tape as specified by the British Standards.

Tree physiological definition

Good- Average physiological condition displayed at the time of inspection, crown shape and density, leaf size, adequate wound closure rate.
Fair- Below average physiological condition displayed at the time of inspection, reduced crown density and leaf size, below average wound closure rate.
Poor- Significantly below average Physiological condition, structural flaws including thinning crown and dieback.
Dead- Dead.

Tree structural condition

Good- No substantial structural defects noted.
Fair- Structural defects noted which could be alleviated by remedial tree works.
Poor- Structural defects noted which cannot be alleviated through remedial tree works.
Dead- Dead.

Tree age classification

Y- Newly planted trees
SM- Semi mature tree within the first third of its projected life expectancy.
EM- Early mature tree within the second third of its projected life expectancy.
M- Mature tree within the final third of its projected life expectancy.
OM- Over mature tree with the final third of its projected life expectancy, exhibiting indications of decline and reduced vigour.
V- Veteran tree which have reached its full projected life expectancy, showing ancient characteristics.

- Any remedial works recommended are for Health and Safety reasons only, irrespective of development at this stage. It is the occupier/owner's responsibility to ensure remedial tree works are arranged. Recommended tree works should be undertaken by competent and qualified operatives in accordance with BS 3998 (2010) Tree Works – Recommendations.
- Contractors undertaking tree works should be made accountable in relation to protected species and habitat including nesting birds and potential bat roost features (Wildlife and Countryside Act 1981) prior to any tree works commencing.
- Root protection area (RPA m2) is the calculated Root protection area in accordance with BS5837:2012 (Annex D) Root Protection area.

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Table 1:

Category U Those in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years	• Trees that have a serious, irremediable, structural defect, such that their early loss is expected due to collapse, including those that will become unviable after removal of other category U trees (e.g.where, for whatever reason, the loss of companion shelter cannot be mitigated by pruning) • Trees that are dead or are showing signs of significant, immediate, and irreversible overall decline • Trees infected with pathogens of significance to the health and/or safety of other trees nearby, or very low-quality trees suppressing adjacent trees of better quality. *NOTE Category U trees can have existing or potential conservation value which it might be desirable to preserve; see **4.5.7**.*			Identification on plan (Stem colour) RED
Category A **Trees of high quality** with an estimated remaining life expectancy of at least 40 years	**1.Mainly arboricultural qualities** Trees that are particularly good examples of their species, especially if rare or unusual; or those that are essential components of groups or formal or semi-formal arboricultural features (e.g. the dominant and/or principal trees within an avenue)	**2.Mainly landscape values** Trees, groups or woodlands of particular visual importance as arboricultural and/or landscape features.	**3.Mainly cultural values including conservation** Trees, groups or woodlands of significant conservation, historical, commemorative or other value (e.g. veteran trees or wood-pasture)	GREEN
Category B **Trees of moderate quality** with an estimated remaining life expectancy of at least 20 years	Trees that might be included in category A, but are downgraded because of impaired condition (e.g. presence of significant though remediable defects, including unsympathetic past management and storm damage), such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the category A designation	Trees present in numbers, usually growing as groups or woodlands, such that they attract a higher collective rating than they might as individuals; or trees occurring as collectives but situated so as to make little visual contribution to the wider locality	Trees with material conservation or other cultural value	BLUE
Category C **Trees of low quality** with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150 mm	Unremarkable trees of very limited merit or such impaired condition that they do not qualify in higher categories	Trees present in groups or woodlands, but without this conferring on them significantly greater collective landscape value; and/or trees offering low or only temporary/transient landscape benefits	Trees with no material conservation or other cultural value	GREY

Cascade chart for tree quality assessment

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Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N		W	E	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
					S										
H1	Beech *(Fagus sylvatica)*	2.8	160	–	–	–	–	–	M	Good	Maintained hedgerow, adjacent to entrance driveway.	None	20+	B2	10
H2	Beech *(Fagus sylvatica)*	2.8	160	–	–	–	–	–	M	Good	Maintained hedgerow, adjacent to entrance driveway.	None	20+	B2	10
T3	Lime *(Tilia europaea)*	20	880	7	7	7	7.5	1	M	Good	Good vitality & vigour, low canopy, collective landscape value provided.	None	40+	A1/2	346
T4	Lime *(Tilia europaea)*	19	720	7	7	6	6.5	1	M	Fair	Good vitality & vigour, low canopy, collective landscape value provided.	None	40+	A1/2	238
T5	Lime *(Tilia europaea)*	17	760	7	8	6	6	1	M	Fair	Good vitality & vigour, collective landscape value provided.	None	40+	A1/2	255
T6	Lime *(Tilia europaea)*	17	750	6	7	6	4	1	M	Fair	Fair vitality, low canopy, wounding at base, collective landscape value provided.	None	40+	A1/2	255

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	S	W	E	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T7	Lime *(Tilia europaea)*	17	680	4	5	6	6	1	M	Fair	Fair vitality, low canopy, collective landscape value provided.	None	40+	A1/2	206
T8	Lime *(Tilia europaea)*	17	670	6	6	6	7	1	M	Fair	Fair vitality, low canopy, collective landscape value provided.	None	40+	A1/2	206
T9	Beech *(Fagus sylvatica)*	15	870	8	4	4	8.5	1.8	M	Fair	Fair vitality, large decayed pruning wound 3m from ground level. Mechanical damage around base of tree. Crown heavily reduced prior to inspection.	Monitor tree condition	20+	B2	346
T10	Lime *(Tilia europaea)*	15	700	6	8	6	4	1.2	M	Good	Good vitality & vigour, collective landscape value provided.	None	40+	A1/2	222
T11	Lime *(Tilia europaea)*	15	770	7	7	5	5	1	M	Good	Good vitality & vigour, low canopy. collective landscape value provided.	None	40+	A1/2	272
T12	Lime *(Tilia europaea)*	15	770	8	7	7	6	1	M	Good	Good vitality & vigour, collective landscape value provided.	None	40+	A1/2	272

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	E	S	W	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T13	Lime *(Tilia europaea)*	15.5	800	7	4	6	6	2	M	Good	Good vitality & vigour, collective landscape value provided.	None	40+	A1/2	290
T14	Lime *(Tilia europaea)*	15.5	760	8	6.5	5	6	2	M	Good	Good vitality & vigour, collective landscape value provided. Fronting Ashlawn house.	None	40+	A1/2	255
T15	Beech *(Fagus sylvatica)*	15	800	8	8	8.5	8	1	M	Fair	Fair vitality & vigour, minor tip dieback within the outer canopy. Decayed stubs noted. Stem bleed observed, collective landscape value provided.	Monitor tree condition	20+	B2	290
G16	Apple *(Malus spp.)*	4	200	_	_	_	_	_	M	Fair	Fair vitality, apple trees within garden area.	None	10+	C2	18
T17	Walnut *(Juglans regia)*	19	1330	11	9	13	11	1.8	M	Good	Good vitality & vigour, codominant stems 2m from ground level, mature specimen, high landscape value provided.	None	40+	A1	707

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	S	W	E	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T18	Oak *(Quercus robur)*	17	1770	10	10	10	10	2	OM	Fair	Good vitality, over-mature specimen within linear boundary group. Major deadwood noted. Tree outside of red line boundary.	None	40+	A1/2	707
G19	Mixed broadleaf	19	800	_	_	_	_	_	M	Fair	Fair, mixed broadleaf boundary group. Containing ash, oak, hawthorn, pine, lime. Major deadwood/ ivy noted throughout. Collective landscape value provided. Impeded access, dimensions estimated.	None	20+	B2	290
T20	Lime *(Tilia europaea)*	19	840	7	7	7	6.5	1	M	Good	Good vitality & vigour, collective landscape value provided.	None	40+	A1/2	327
S21	Unknown	1	800	0	0	0	0	0	M	Dead	Stump	None	N/A	U	N/A
S22	Unknown	1	800	0	0	0	0	0	M	Dead	Stump	None	N/A	U	N/A

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	E	S	W	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T23	Lime *(Tilia europaea)*	19	580	7	7	7	7	1	M	Good	Good vitality & vigour, collective landscape value provided, offsite tree, dimensions estimated.	None	40+	A1/2	150
T24	Beech *(Fagus sylvatica)*	19	700+700	7	8	7	8	2	M	Fair	Fair vitality & vigour, included Co-dominant union 1m from ground level. Moderate ivy coverage. Outer canopy tip dieback observed. Adjacent to field access.	Monitor tree condition	20+	B2	430
T25	Lime *(Tilia europaea)*	22	920	7.5	7	7	4.5	1	M	Good	Good vitality & vigour, collective landscape value provided.	None	40+	A1/2	387
T26	Lime *(Tilia europaea)*	22	880	6	7.5	7	7	1	M	Good	Good vitality & vigour, minor deadwood observed, collective landscape value provided.	None	40+	A1/2	346

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	S	W	E	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T27	Lime *(Tilia europaea)*	22	870	7.5	4	6	6	1	M	Fair	Fair vitality & vigour, outer canopy dieback observed	Monitor tree condition	20+	B2	346
T28	Horse Chestnut *(Aesculus hippocastanum)*	14.5	820	6	6.5	6	7	1.8	M	Good	Good vitality & vigour, collective landscape value provided.	None	20+	B2	308
G29	Mixed broadleaf	22	650	_	_	_	_	_	M	Good	Good vitality, trees located off site, dimensions estimated. Linear group adjacent to roadside, screening from adjacent road. High landscape value provided. Contains, hawthorn, lime, ash, oak, beech, elm.	None	40+	A1/2	191
T30	Lime *(Tilia europaea)*	20	830	8	8	8	8	1.8	M	Good	Good vitality & vigour, collective landscape value provided.	None	40+	A1/2	308

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	S	W	E	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T31	Horse Chestnut *(Aesculus hippocastanum)*	19.5	1009	9	9	12	7	1.5	M	Fair	Fair vitality & vigour, bark wounding noted around lower stem/ surface roots.	None	40+	A1/2	452
S32	Unknown	0	900	0	0	0	0	0	SM	Dead	Stump	None	<10	U	N/A
S33	Unknown	0	950	0	0	0	0	0	SM	Dead	Stump	None	<10	U	N/A
T34	Oak *(Quercus robur)*	15.5	550	3	10	11	11	1.8	M	Good	Good vitality & vigour, group edge, suppressed growth, major deadwood noted. Off site tree, dimensions estimated.	None	40+	A1/2	137
G35	Mixed broadleaf	21	700	_	_	_	_	_	M	Good	Good vitality, mixed broadleaf group containing, horse chestnut, lime, pine, oak, hawthorn, trees located off site dimensions estimated. Linear group adjacent to roadside, screening from adjacent road. High landscape value provided.	None	40+	A1/2	222

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	E	S	W	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T36	Oak *(Quercus robur)*	17	800	10	11	10	10	1.8	M	Good	Good vitality & vigour, group edge, major deadwood in lower canopy. Off site tree, dimensions estimated.	None	40+	A1/2	290
T37	Lime *(Tilia europaea)*	22	880	8	7	7	7	1.5	M	Good	Good vitality & vigour, major deadwood observed throughout, collective landscape value provided.	None	40+	A1/2	346
T38	Lime *(Tilia europaea)*	22	830	5	7	7	5	1.5	M	Good	Good vitality & vigour, minor deadwood observed, collective landscape value provided.	None	40+	A1/2	308
T39	Lime *(Tilia europaea)*	22	810	7	7	7	7	1.5	M	Fair	Good vitality & vigour, minor deadwood observed, collective landscape value provided.	None	40+	A1/2	290

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N		W	E	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
					S										
T40	Oak *(Quercus robur)*	19	950	10	11	10	10	3.5	M	Good	Good vitality & vigour, mature specimen along boundary. Pruning wounds on lower stem from recent crown lifting. Fenced on adjacent construction site. Off site tree, dimensions estimated.	None	40+	A1/2	408
T41	Oak *(Quercus robur)*	10	950	3	4	4	4	4	M	Poor	Poor vitality, mature tree along boundary. Crown heavily reduced to approximately 10m from ground level, decayed stubs noted. Fenced on adjacent construction site. Off site tree, dimensions estimated.	None	20+	B2	408

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N		W	E	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
					S										
T42	Oak *(Quercus robur)*	19	910	10	6	10	11	3	M	Good	Good vitality & vigour, mature specimen along boundary. Pruning wounds on lower stem from recent crown lifting. Large trunk tear out wound northeast side of stem & south side. Split limb 8m facing southeast. Fenced on adjacent construction site. Off site tree, dimensions estimated.	None	40+	A1/2	366
T43	Lime *(Tilia europaea)*	22	790	7	6	5	8	1.5	M	Good	Good vitality & vigour, minor deadwood observed. Bark wounding around base of tree. Collective landscape value provided.	None	40+	A1/2	290

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	S	W	E	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T44	Lime *(Tilia europaea)*	22	770	7.5	7	6	6.5	1.5	M	Good	Good vitality & vigour, minor deadwood observed. Bark wounding around base of tree. Collective landscape value provided.	None	40+	A1/2	272
T45	Lime *(Tilia europaea)*	22	730	6	6	6.5	6.5	1.5	M	Good	Good vitality & vigour, major deadwood observed. Bark wounding around base of tree. Collective landscape value provided.	None	40+	A1/2	238
T46	Pine *(Pinus sylvestris)*	23	550	6	6	6	6	8	M	Good	Good vitality & vigour, cluster of pine trees along site boundary. Fenced on adjacent construction site. Off site tree, dimensions estimated.	None	20+	B2	137

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m)				Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
				S	N	W	E								
T47	Pine *(Pinus sylvestris)*	16	350	1.5	6	4	4	8	SM	Fair	Fair vitality & vigour, cluster of pine trees along site boundary. Fenced on adjacent construction site. Off site tree, dimensions estimated.	None	20+	B2	55
T48	Pine *(Pinus sylvestris)*	16.5	450	6	6	6.5	5	8	SM	Fair	Fair vitality & vigour, cluster of pine trees along site boundary. Fenced on adjacent construction site. Off site tree, dimensions estimated.	None	20+	B2	92

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	S	W	E	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T49	Oak *(Quercus robur)*	21	910	8	8	8	7.5	7.5	M	Good	Fair vitality & vigour, mature tree along boundary. Asymmetric canopy due to neighboring tree removal, minor canopy dieback observed. Fenced on adjacent construction site. Off site tree, dimensions estimated.	None	20+	B1/2	366
G50	Poplar *(Populus tremula)*	18	250	_	_	_	_	_	Y	Fair	Group within neighboring property.	None	20+	B2	28
T51	Hawthorn *Crataegus monogyna)*	6	120	3.5	3.5	3.5	3.5	1.2	M	Fair	Fair vitality & vigour, tree occluded around metal fence, bark wounding apparent.	None	10+	C2	7

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	S	W	E	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T52	Horse Chestnut *(Aesculus hippocastanum)*	17	900	8	7	7.5	8	2	M	Fair	Fair vitality & vigour, bark wounding around base of tree. Large tear out wound 3-4m facing southeast where Co-dominant stem has failed. Asymmetric crown as a result.	None	20+	B2	366
S53	Unknown	0	700	0	0	0	0	0	SM	Dead	Stump	None	<10	U	N/A
S54	Unknown	0	800	0	0	0	0	0	SM	Dead	Stump	None	<10	U	N/A
S55	Unknown	0	700	0	0	0	0	0	SM	Dead	Stump	None	<10	U	N/A
S56	Unknown	0	850	0	0	0	0	0	SM	Dead	Stump	None	<10	U	N/A
S57	Unknown	0	800	0	0	0	0	0	SM	Dead	Stump	None	<10	U	N/A
S58	Unknown	0	950	0	0	0	0	0	SM	Dead	Stump	None	<10	U	N/A
S59	Unknown	0	850	0	0	0	0	0	SM	Dead	Stump	None	<10	U	N/A
S60	Unknown	0	700	0	0	0	0	0	SM	Dead	Stump	None	<10	U	N/A
T61	Ash *(Fraxinus excelsior)*	7	850	–	–	–	–	–	M	Dead	Dead 7m monolith, impeded access, within garden flower bed. Dimensions estimated.	None	<10	U	327
T62	Lime *(Tilia europaea)*	20	860	7.5	8	7	8	1.8	M	Good	Good vitality & vigour, impeded access, within garden flower bed. Dimensions estimated.	None	40+	A1/2	327

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	E	S	W	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T63	Leyland Cypress *(Cupressus x leylandii)*	12	280	3.5	3.5	3.5	2	1	SM	Fair	Fair vitality & vigour, within garden flower bed.	None	10+	C2/3	34
T64	Wellingtonia *(Sequoiadendron giganteum)*	22	1430	6.5	7.5	7	7	2	M	Good	Good vitality & vigour, mature specimen. Adjacent to field access/ fronting Ashlawn House. High landscape value provided.	None	40+	A1/2	707
T65	Lime *(Tilia europaea)*	22	860	9	9	5	9	1.8	M	Good	Good vitality & vigour, light ivy coverage, minor deadwood observed. Adjacent to field access.	None	40+	A1/2	327
T66	Wellingtonia *(Sequoiadendron giganteum)*	23	1300	6.5	6.4	7	6.5	2	M	Good	Good vitality & vigour, mature specimen, within garden boundary flower bed.	None	40+	A1/2	707
T67	Lime *(Tilia europaea)*	12	300	5	4.5	6.5	6.5	2	M	Fair	Fair vitality & vigour, suppressed by larger neighboring tree, within garden boundary flower bed	None	40+	A1/2	41

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	E	S	W	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T68	Birch (*Betula pendula)*	11.5	300	4	5	6.5	6	2	M	Fair	Fair vitality & vigour, suppressed by larger neighboring tree, asymmetric canopy, leaf browning/ wilting observed, within garden boundary flower bed. Dimensions estimated.	Monitor tree condition Spring 2026	20+	B2/3	41
T69	Weeping ash *(Fraxinus pendula)*	11.5	570	3.5	5.7	3.5	5	1	M	Poor	Poor vitality & vigour, outer canopy dieback observed historic decayed pruning wounds & stubs noted. Within garden boundary flower bed.	None	10+	C2/3	150
H70	Cherry laurel *(Prunus laurocerasus)*	3	120	-	-	-	-	0	SM	Good	Fair vitality, along southwestern garden boundary.	None	20+	C2	7

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N		W	E	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
					S										
T71	Ash *(Fraxinus excelsior)*	9.5	190+200+200	4	4	4	4	2	SM	Fair	Fair vitality & vigour, multi-stemmed from ground level. Minor tip dieback noted, suspected ash dieback symptoms, within garden boundary flower bed. Dimensions estimated.	Monitor tree condition, Spring 2026	10+	C2	55
T72	Lime *(Tilia europaea)*	14	690	6	4.3	4	5.8	2	M	Fair	Fair vitality & vigour, mechanical damage at base, suspected cattle damage. Group asymmetry. Collective landscape value provided.	None	20+	B1/2	222

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	E	S	W	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T73	Lime *(Tilia europaea)*	14	450	3.7	5.3	5	5	2	M	Fair	Fair vitality & vigour. Minor outer canopy dieback observed, deadwood present as a result, mechanical damage at base, suspected cattle damage. Group asymmetry. Collective landscape value provided.	None	20+	B1/2	92
T74	Lime *(Tilia europaea)*	14	500	3.5	4.3	4.5	3.5	2	M	Fair	Fair vitality & vigour, minor outer canopy dieback, minor deadwood present as a result. Group asymmetry. Collective landscape value provided.	None	20+	B1/2	113
T75	Birch *(Betula pendula)*	13	270	4	3	3	3	2	SM	Fair	Fair vitality and vigour, minor tip dieback noted.	None	10+	C1/2	34

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	E	S	W	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T76	Poplar *(Populus tremula)*	13.5	300	3	4	4	4	4.5	SM	Poor	Poor vitality and vigour, major stem decay noted. Failure possible. Dimensions estimated.	Fell	<10	U	41
T77	Poplar *(Populus tremula)*	13.5	300	3.5	4.5	3.5	3.5	1.8	SM	Poor	Fair vitality and vigour, historic tear out wounds noted with associated bark wounding. Dimensions estimated.	None	10+	C1	41
T78	Ash *(Fraxinus excelsior)*	10	350	7	7	7	7	2	SM	Good	vigour, within hedgerow field boundary. Dimensions estimated.	None	20+	B2/3	55
T79	Hornbeam *(Carpinus betulus)*	9	400	5	5	5	5	2	SM	Good	Good vitality and vigour, multi-stemmed, within hedgerow field boundary. Dimensions estimated.	None	20+	B2/3	72
H80	Hawthorn (*Crataegus monogyna)*	3.5	100	-	-	-	-	0.5	SM	Fair	Fair vitality, young/ semi-mature linear field boundary hedgerow. Dimensions estimated.	None	20+	C2	5

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	E	S	W	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T81	Hornbeam *(Carpinus betulus)*	9	425	6	6	6	6	2	SM	Good	Good vitality and vigour, multi-stemmed, within hedgerow field boundary. Dimensions estimated.	None	20+	B2/3	81
T82	Beech *(Fagus sylvatica)*	12	480	4.5	4.5	4.5	4.5	4	SM	Poor	Poor vitality & vigour. Sparse remaining canopy, with little remaining leaf coverage. Dimensions estimated.	Monitor tree condition, Spring 2026	<10	U	102

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	E	S	W	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
G83	Mixed broadleaf	16	550	-	-	-	-	2	EM	Fair	Fair vitality & vigour. Group adjavent to pond/ field boundary, group asymmetry observed. Minor deadwood noted throughout. Suspected Ash dieback observed, minor tip dieback noted. *Inonotus hispidus* noted on weeping ash, western edge of group. Contains oak, ash, weeping ash. Young to early mature.	Monitor ash dieback/ weeping ash	20+	B2	137
T84	Ash *(Fraxinus excelsior)*	17	700	7.5	8	8	7.5	4	SM	Fair	Fair vitality & vigour. Co-dominant union 3m from ground level. Multiple *Inonotus hispidus* brackets on main stem from ground level to 2m. A sound test confirmed audible signs of stem decay.	Monitor tree condition. Undertake structural stability assessment.	20+	B2/3	222

Tree No:	Species	Height (m)	Stem Diameter (mm)	Canopy spread (m) N	E	S	W	Crown Clearance Height (m)	Life stage	Physiological Condition	General Observations	Preliminary Management Recommendations	Est. Rem. Contrib (Yrs)	Category	RPA (M2)
T85	Wild cherry *(Prunus avium)*	8	180+160	4	4	4	3.5	1	SM	Fair	Fair vitality & vigour. Included Co-dominant union 1m from ground level. Between field boundaries.	None	20+	B2/3	28

NOTE:

Where applicable this drawing is to be read in conjunction with Greensted Arboricultural Consultancy Ltd Arboricultural Report. Do not scale from this drawing other than for the consideration of tree protection measures. Use only dimensions provided. This drawing was based upon drawings provided by the client. The original of this drawing was produced in colour and monochrome versions cannot be relied upon. This drawing is to be used only for the purposes indicated. It is the responsibility of the contractor to ensure any necessary consents are in place. This drawing is copyright and the property of and must not be reproduced without prior written agreement.

SCALE BAR 1:200

0 4 8 20 40

SCALE BAR 1:500

0 10 20 50 100

T1

Tree survey reference number

Indicative tree stem location and categorisation.

Indicative crown spread

Tree stem location and value category according to BS 5837:
Red – No value
Grey – Low value
Blue – Moderate value
Green – High value

ROOT PROTECTION AREA (CYAN Shading): This area is where ground disturbance must be carefully controlled. If encroachment is planned, then this must be assessed by HWA.

Rev.	Description.	Date.

GREENSTED ARBORICULTURAL CONSULTANCY LTD

Client: Ashlawn Investments Limited

Site: Land at Ashlawn House

Drawing Title: Tree Constraints Plan 1 of 1

Date: 16.09.25 Drawn By: DAP

Scale: 1:500 @ A0 Checked By: JB

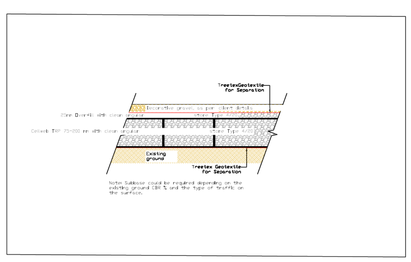
Drawing Number: GA 106 TCP 01 Rev. .

Appendix B: Tree Protection Plan

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Existing hard surface here to act as ground protection/sub base for upgraded surface

Boundary fence to act as tree protection here.



INSET 1: Indicative reduced-dig surface specification.

NOTE:

Where applicable this drawing is to be read in conjunction with Greensted Arboricultural Consultancy Ltd Arboricultural Report. Do not scale from this drawing other than for the consideration of tree protection measures only. Use only dimensions provided. This drawing was based upon drawings provided by the client. The original of this drawing was produced in colour and monochrome versions cannot be relied upon. This drawing is to be used only for the purposes indicated. It is the responsibility of the contractor to ensure any necessary consents are in place. This drawing is copyright and the property of Greensted Arboricultural Consultancy Ltd and must not be reproduced without prior written agreement.

SCALE BAR 1:200

0 4 8 20 40

SCALE BAR 1:500

0 10 20 50 100

T1

Tree survey reference number

Indicative tree stem location and categorisation.

Indicative crown spread

Indicative root protection area (RPA - below ground constraint)

Tree stem location and value category according to BS 5837:
Red - No value
Grey - Low value
Blue - Moderate value
Green - High value

Trees/Hedges proposed for removal to facilitate development.

Areas requiring 'reduced-dig' type surface construction as specified at Inset 1.

Proposed line of tree protection fencing.

Rev.	Description.	Date.

GREENSTED ARBORICULTURAL CONSULTANCY LTD

Client: Ashlawn Investments Limited

Site: Land at Ashlawn House

Drawing Title: Tree Protection Plan 1 of 1

Date:	20.02.26	Drawn By:	DAP
Scale:	1:500 @ A0	Checked By:	JB

Drawing Number: GA-106-TPP-01 Rev. B

Appendix C: Tree Survey Works Schedule

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Works required to facilitate the current development proposals:

Tree No	Species	Recommended Works
Part of G29	N/A	Fell one tree
Part of H1 & H2	Beech	Fell identified sections
T3	Lime	Crown lift to 5m over proposed surfacing and undertake <3m apical and lateral crown reduction to form high pollard.
T30	Lime	Crown lift to 3m over proposed footpath

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ProHort
HORTICULTURE MANAGED

[redacted]

Head Office: [redacted]
Email: [redacted]

Addendum to the Proposed Residential Scheme on Land off Ashlawn Road, Rugby

January 2026

1. Assessment of Application Site

1.1 This LVIA Addendum has been prepared in response to consultation comments issued by the Arboricultural Officer dated 14th January 2026. The landscape comments state as follows:

"The application type is located with the Landscape Character Area "Dunsmore" (Landscape Character Assessment of Rugby 2025) an "area with its intensively farmed and partially urbanised landscape, is marked by varied rolling topography and characterised by low glacial plateau and meandering river valleys." This also lists several pressures including development which have potential to cause degradation of the landscape character area. The landscape guidelines make several recommendations in relation to protecting the distinctiveness of the Dunsmore Landscape Character Area to include protecting existing hedgerows and trees, maintaining and enhancing the enclosed wooded character of the landscape and maintaining and enhancing the distinctive character of the landscape.

A Landscape and Visual Impact Assessment has been submitted to support the application and states that the application site has "moderate landscape value and largely low sensitivity". However, the Landscape Assessment of the Borough of Rugby Sensitivity and Condition Study 2006 describes the Landscape Character Area where the application site is located as being of "high" overall sensitivity and being in "strong" condition and especially with regard its high visual sensitivity given its location along a ridge which leads down to the Rainsbrook Valley to the south. Whilst there are high levels of visual containment to the north of the site due to established mature tree cover (G35 in the tree report) the viewpoints provided in the visual impact assessment do not appear to include views from the south and across the Rainsbrook Valley which would also inform the proposal in terms of maintaining and enhancing the distinctive parkland setting."

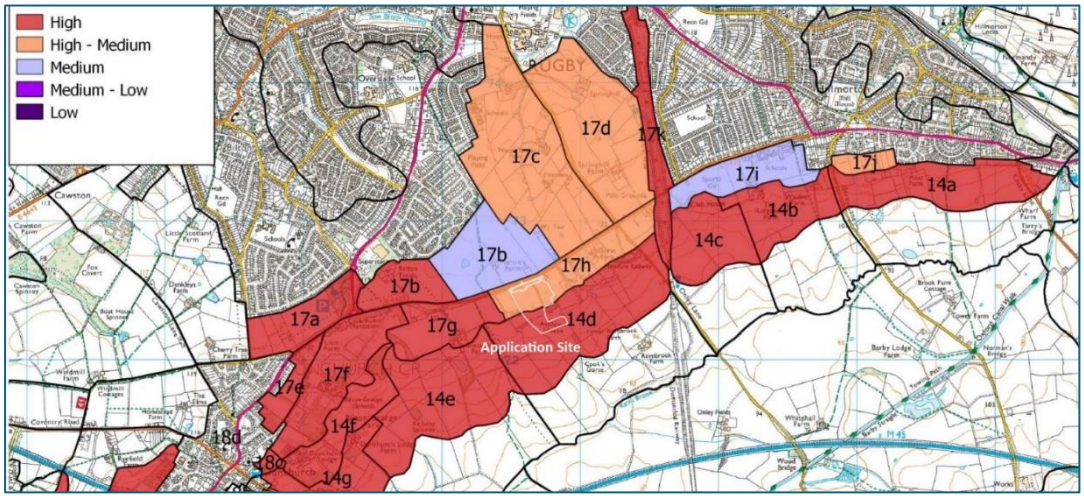


Figure 1: Housing Sensitivity Map

1.2 The assessment of the Application Site in the LVIA is described as "moderate landscape value and largely low sensitivity" and references the Rainsbrook Valley Landscape Sensitivity Study 2017 which indicates that the location of the majority of the Application Site falls within the 17h High/Medium sensitivity category. See **Figure 1.**

1.3 The focus of this assessment is on identifying the landscape value as well as potential development opportunities for housing. This area to the north of the Application Site was selected by the developer for the housing development and is described in the table below from the Rainsbrook Study.

Zone 17h	High/Medium sensitivity
Potential for housing development	"There is scope for limited development but this should not extend into neighbouring zones. The existing landscape structure with mature trees must be retained.
Cultural sensitivity	High
Ecological sensitivity	Moderate
Visual sensitivity	Low
Ecological Corridors	Declining
Sense of Enclosure	Framed to enclosed
Key receptors	Rural residents with high sensitivity Road users with low sensitivity
Views	The only views "*are glimpsed views through good tree cover from Ashlawn. There are occasional distant views across Rainsbrook valley to the south.*"
Intervisibility	Low – with tree cover preventing extensive views into this zone.
Policy suggestions	The existing landscape structure with mature trees must be retained.

Table 1

1.4 The site comprises a number of mature trees set in improved grassland and at the time of the visit, cows were grazing in the west field and horses in the east field. Because of the elevation of the site, Rainsbrook Valley becomes visible only at the south end of the site beyond Ashlawn House as indicated in **Figure 2**.



Figure 2: View from the southern boundary of west field

1.5 The LVIA is assessing the visual sensitivity, combined with landscape sensitivity. Section 2.3.11 of the LVIA states "The housing of the proposed development is confined to the northern area of the site (17h) which is described as having Low Visual Sensitivity and a 'Framed to enclosed' sense of enclosure. In addition, it notes that due to the proximity to Ashlawn Road, this section

of the application site suffers from traffic noise. The southern area will retain the parkland features through additional tree planting and pond creation, all designed to comply with the high sensitivity of the southern area of the site as outlined in the Landscape Sensitivity Study and also to increase biodiversity and link into the broader green infrastructure."

1.6 The Application Site has a well-maintained landscape, with scattered mature trees, but this is reasonably typical of the lands characterised in Zone 17h as outlined in the Rainsbrook study. In addition, the Application Site lies at the urban edge with extensive new build housing to the north and a new housing development in the process of construction at its western boundary, which will reduce the sensitivity of the baseline.

1.7 There is currently visual separation of the east field from Ashlawn House and a further buffer is proposed. Ashlawn House is mentioned in the Warwickshire Historic Landscape Characterisation Report as one of the smaller designed parks associated with small country houses. The proposals will be set back approximately 85m from Ashlawn House, which will retain the beech lined driveway off Ashlawn Road.

1.8 The Moderate Landscape Value and Low Sensitivity is therefore justified for the zone to the north of the Application Site where the built area is to be sited.

1.9 The design has sought to provide housing in the context of the existing parkland setting of the Application Site. There will be extensive tree planting within the built area. The area to the south of the site is a particularly sensitive due to the open views from the south end of the west field across the Rainsbrook Valley and will not have any built form but be open land with tree planting, which will retain/enhance the parkland estate character and contribute to the Biodiversity Net Gain (BNG) Strategy.

1.10 Four additional viewpoints have been selected from the south and across the Rainsbrook Valley in response to the consultation comments received from the Arboricultural Officer. **See Figure 3.**

2 Viewpoints

2.1 The development comprises low lying two-storey houses with single-storey dwellings to the north of the west field and on the edge of the development in the eastern field, set back towards the north of the site by approximately 85m from Ashlawn House and The Bungalow.

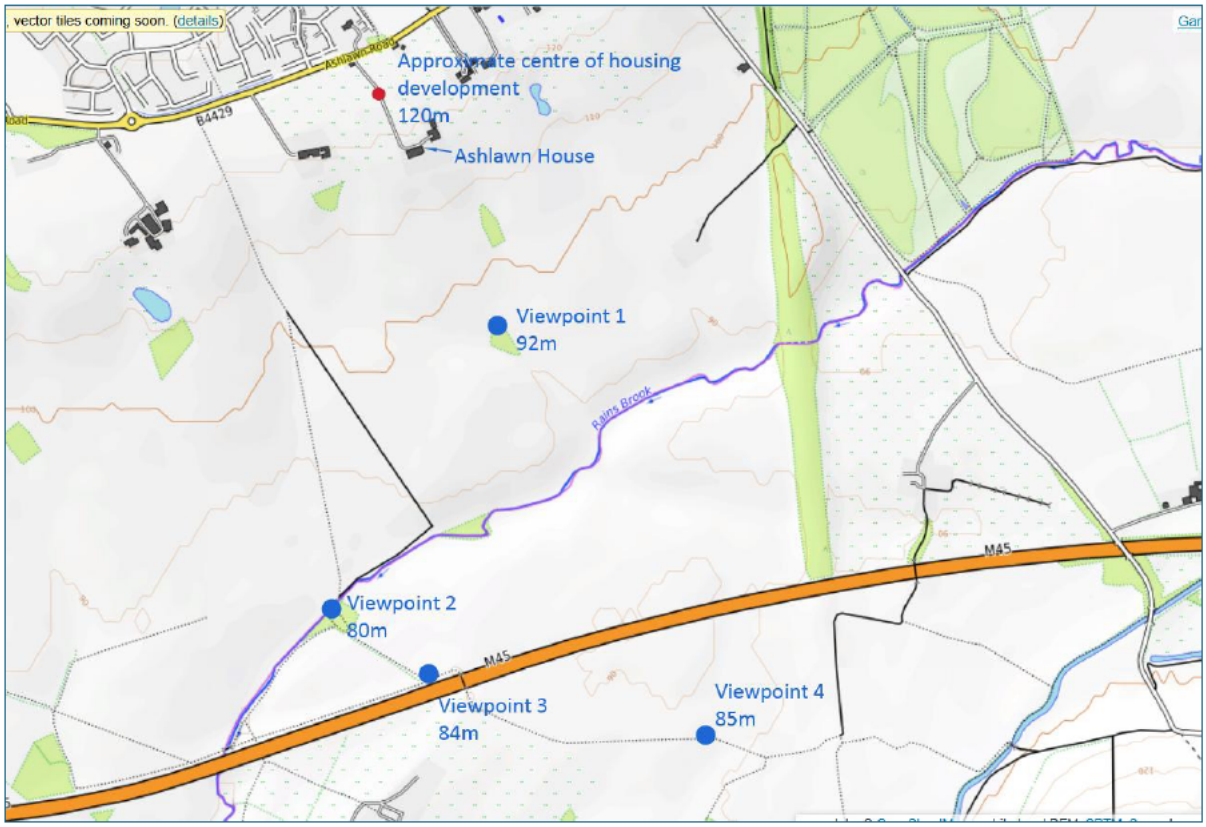


Figure 3 – Suggested viewpoints inserted onto contour map. Source: OpenTopoMap

2.2 **Figure 3** indicates the elevation of the suggested viewpoints that lie to the south/southwest of the proposed development and which have caused concern as to their potential visibility across the Rainsbrook Valley. This is summarised in **Table 2.** The approximate centre of the housing development and Ashlawn House are indicated on the plan.

Viewpoint	Elevation decrease from centre of proposed housing (m)	Distance from proposed housing
1	28	667m
2	40	1.3km
3	36	1.4km
4	35	1.8km and lies on the south side of the M45

Table 2

ADDITIONAL VIEWPOINT 1 INCLUDING VIEW FROM RAINSBROOK FARM

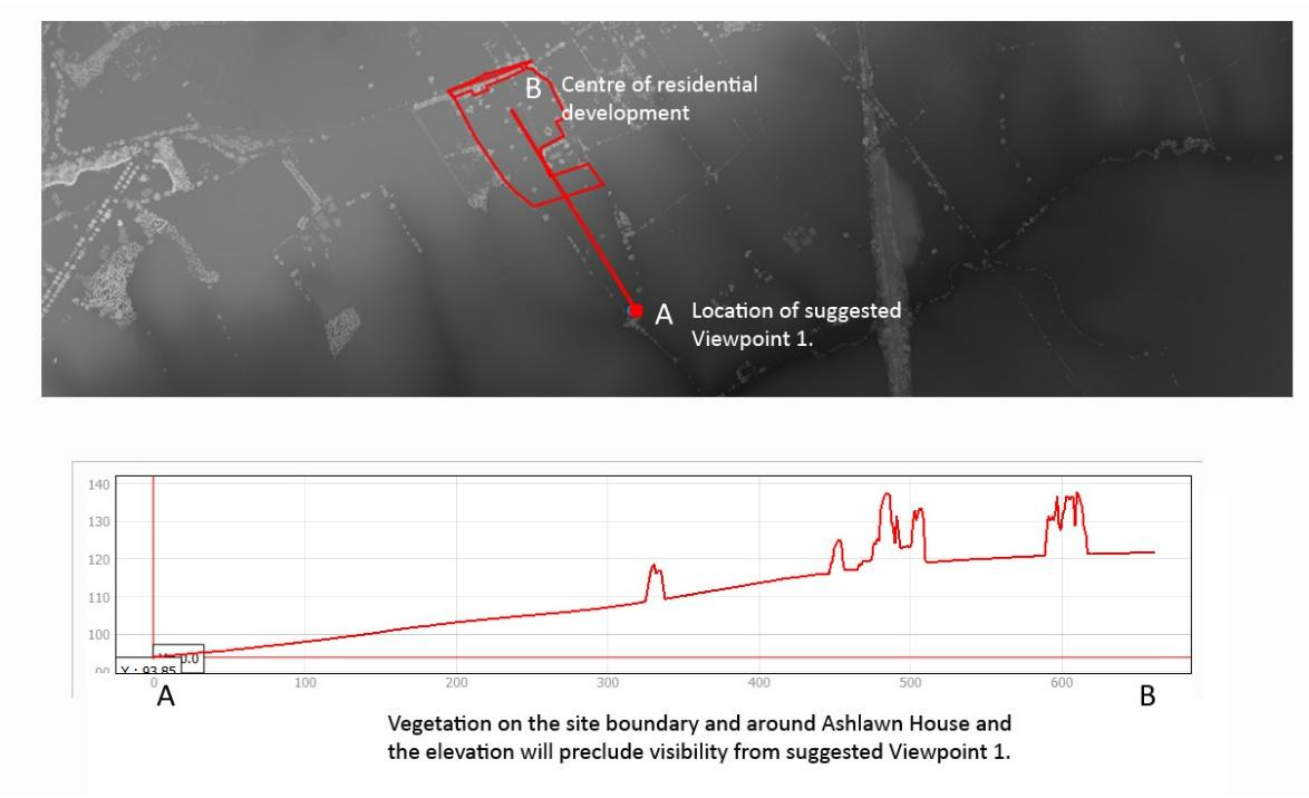


Figure 4 - Additional viewpoint 1 - 667m distance from proposed housing

2.3 Suggested Viewpoint 1 is at Cook's Gorse, which is not on a Public Right of Way. The LVIA typically focuses on impacts on public viewpoints, such as public rights of way, roads and recreational spaces. However, there is unlikely to be any visibility due to intervening vegetation on field barriers and the vegetation around Ashlawn House and Ashlawn House itself. **See Figure 5.**

2.4 The nearest property to suggested Viewpoint 1 is Rainsbrook Farm, which is accessed on a private drive from Onley Lane. Viewpoint 14 in the LVIA was taken from Onley Lane and there was no visibility of the Application Site, however, it was taken further north and at a different angle. A profile of the view from the Farm indicates that there is unlikely to be any visibility due to intervening vegetation and the elevation. **See Figure 6.**

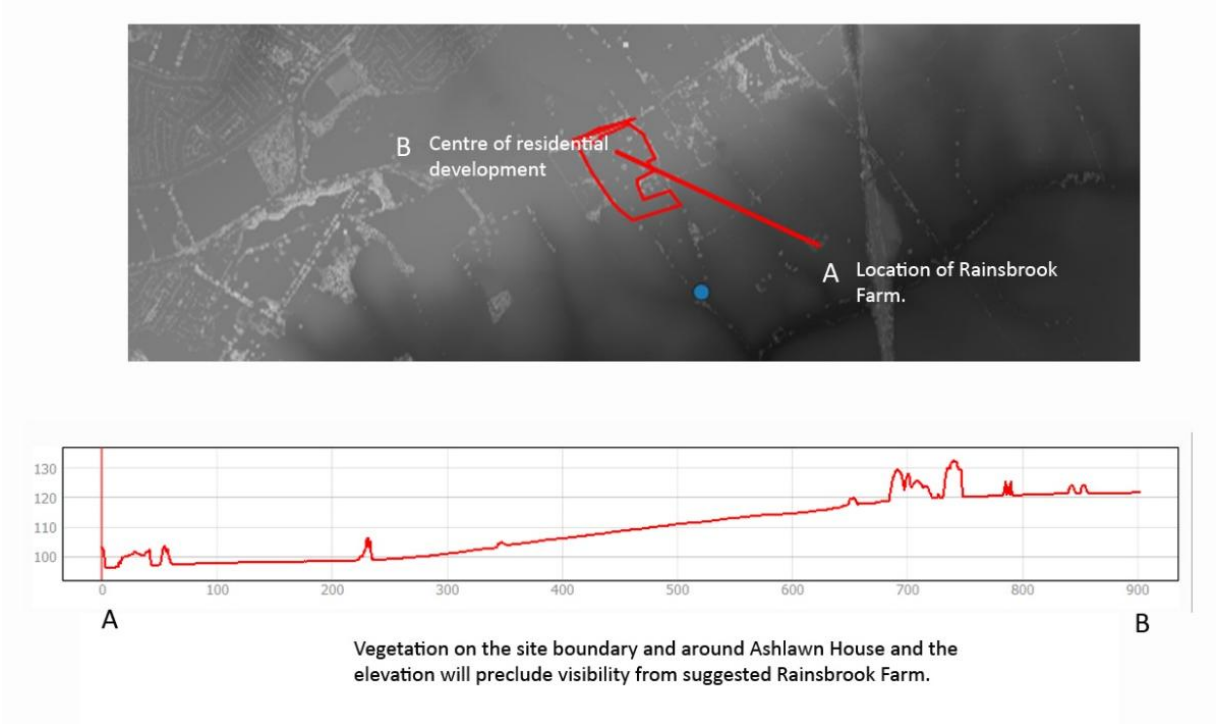


Figure 5 - Viewpoint from Rainsbrook Farm

VIEWPOINT 2

2.5 There are few views looking up to the site from the south/south west as the land falls steeply from the site and largely comprises large scale agricultural fields, reducing the number of receptors. However, the bridleway R177 may be a popular walking route as if offers wide views over the Rainsbrook Valley and descends to Rains Brook. 321m further from suggested viewpoint 2 the bridleway crosses the M45 and leads to Onley Grounds Equestrian Complex and HM Prison Onley.

2.6 Originally the LVIA included a Viewpoint 14 on the bridleway (R177) located at the additional Viewpoint 2. However, from Viewpoint 6 in the LVIA, taken on the bridleway (**see below**), the ground slopes down steeply precluding any visibility due to the decrease in elevation and the intervening vegetation.



Figure 6 – Viewpoint 6 in the LVIA indicating the lack of visibility of the site from the bridleway R177 running from Ashlawn Road to the Rains Brook.

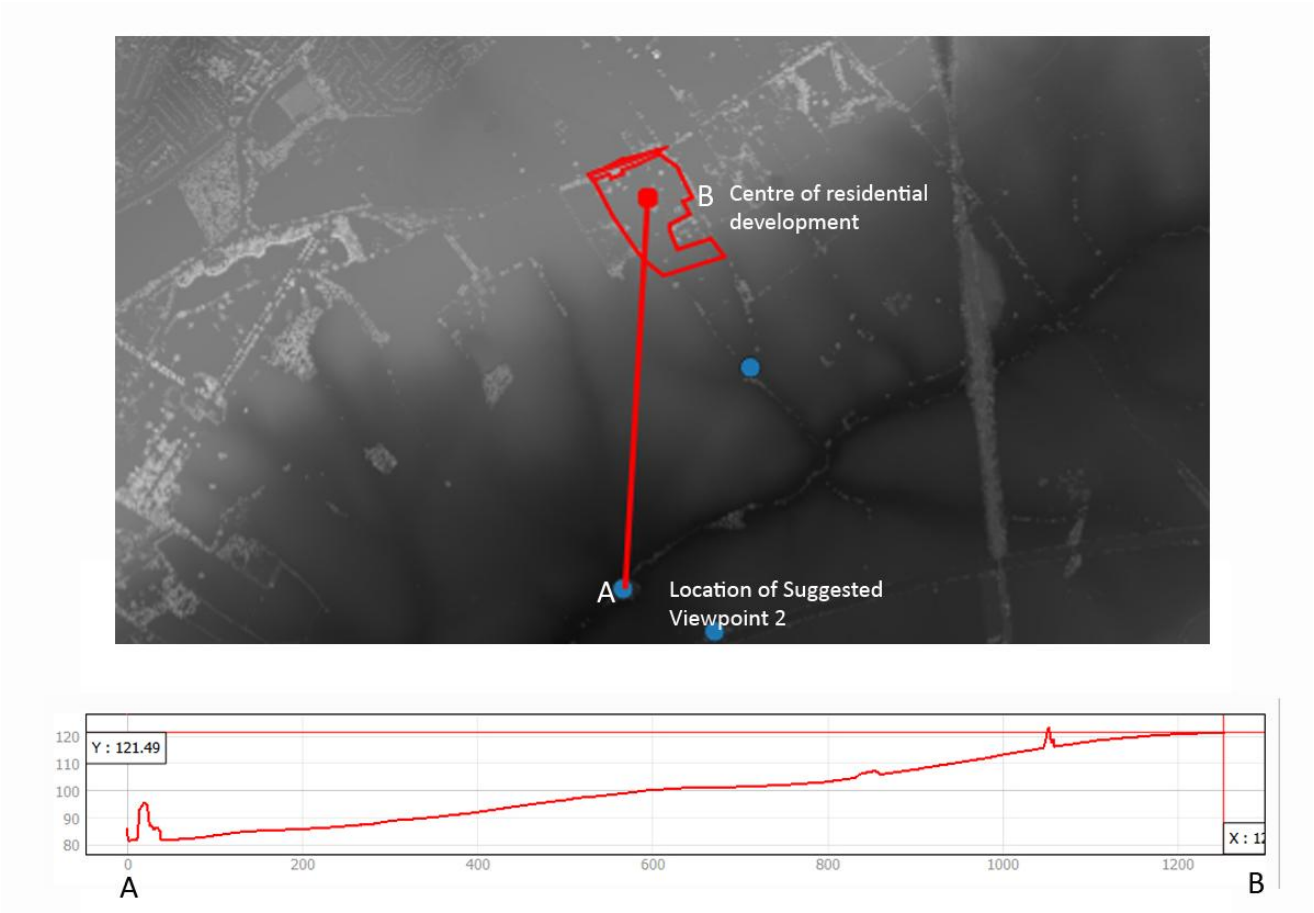


Figure 7 – Additional Viewpoint 2 – 1.3km distance from proposed housing

2.7 Any visibility of the proposed development is unlikely to be perceptible at this elevation and distance and receptors are unlikely to be aware of any change in the view. Landscaping between the southernmost dwellings of the development and the edge of the development along with a strengthening and tree planting at the southern end on the western boundary will ensure screening of the dwellings from the long distance views south of the site.

VIEWPOINT 3

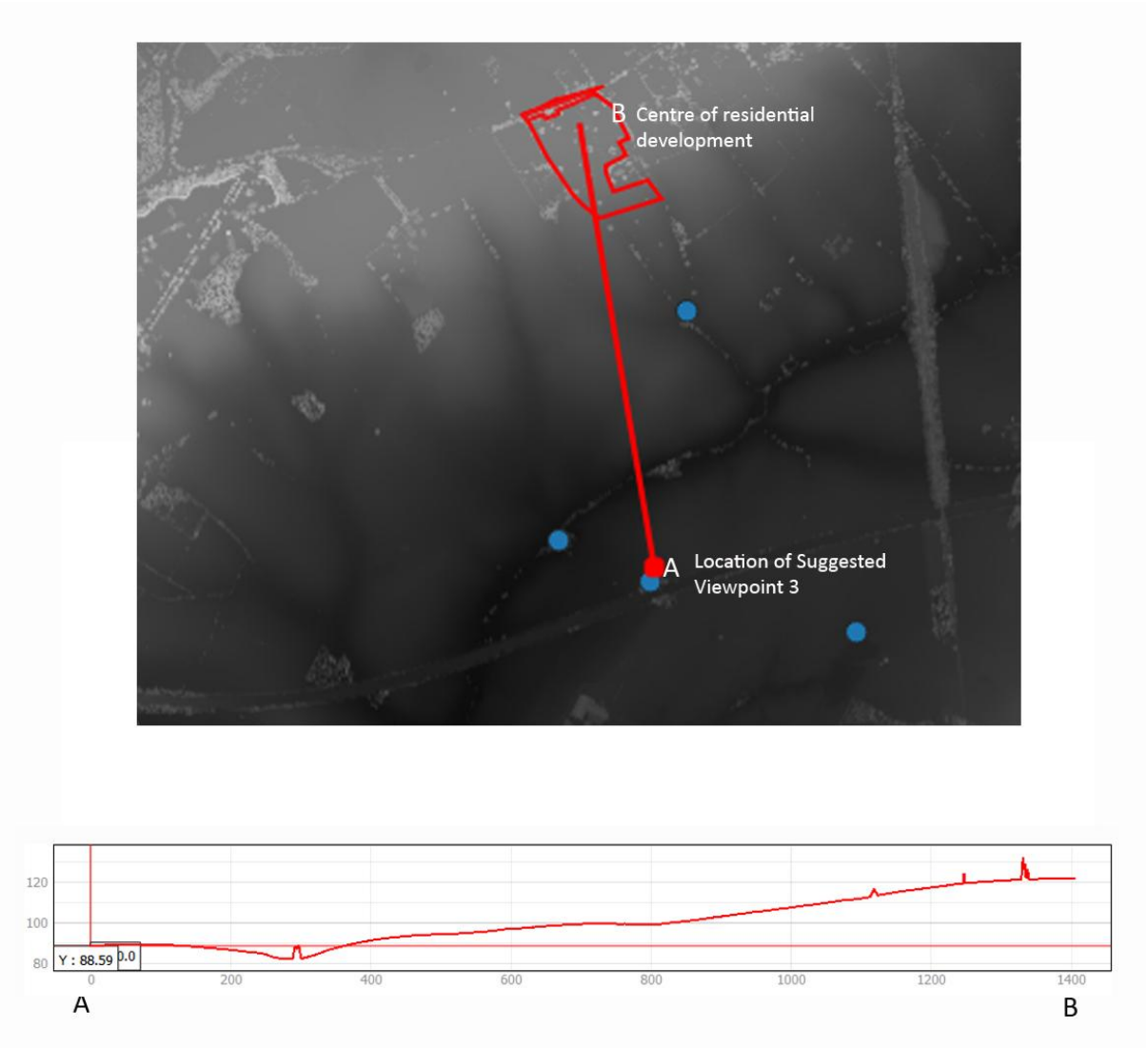


Figure 8- Additional Viewpoint 3 – by M45 - 1.4km distance from proposed housing

2.8 The profile for suggested Viewpoint 3 indicates the dip at the Rains Brook with some vegetation nearing the proposed development. Any visibility is likely to be barely perceptible at this elevation and distance and receptors are unlikely to be aware of any change in the view. Landscaping between the southernmost dwellings of the development and the edge of the development along with a strengthening and tree planting at the southern end on the western boundary will ensure screening of the dwellings from the long distance views south of the site.

VIEWPOINT 4

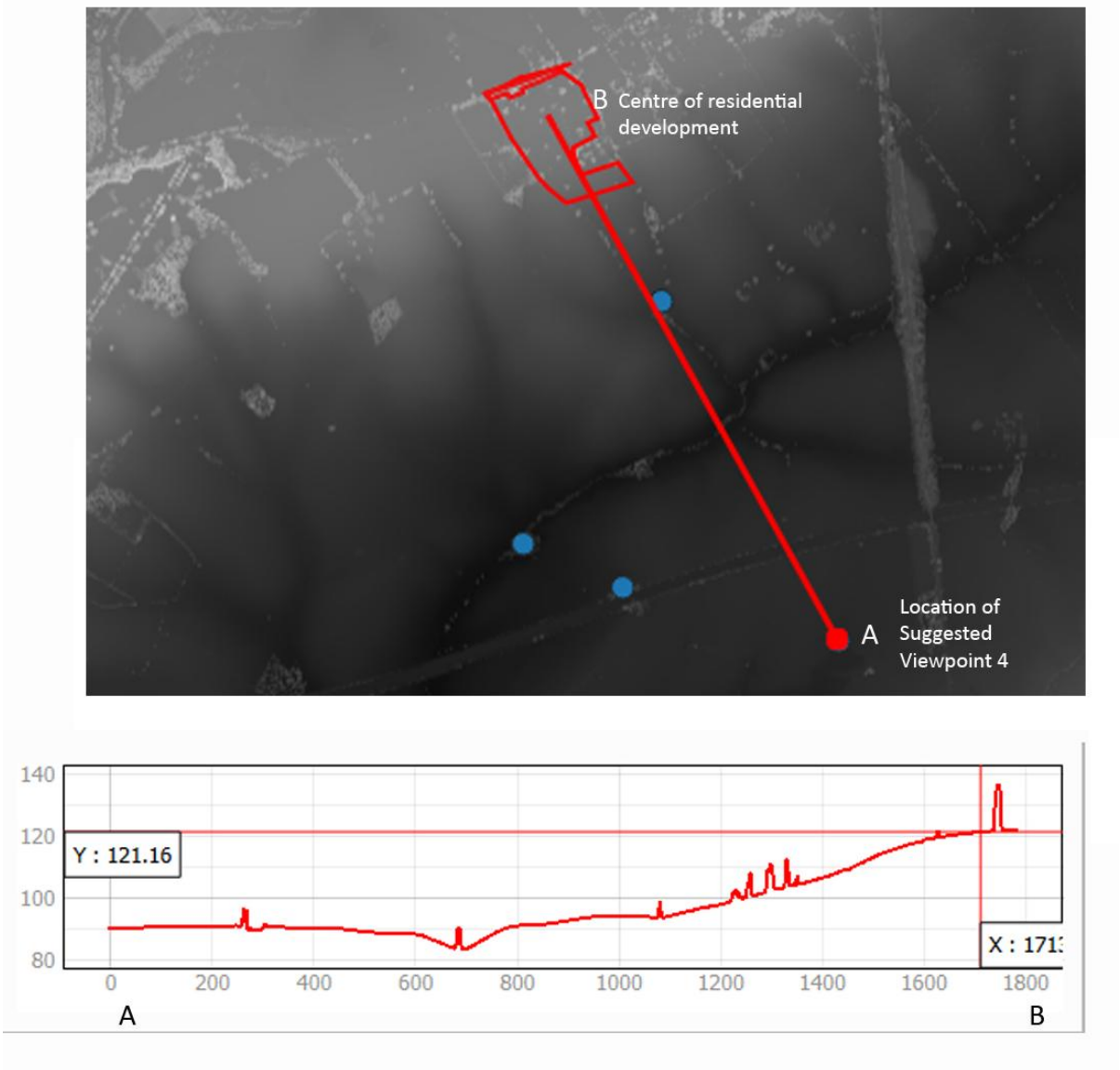


Figure 9 - Additional Viewpoint 4 – 1.8km distance from proposed housing

This viewpoint is beyond the M45. Distance, the intervening M45 and the vegetation will not give any visibility of the proposed development.



Figure 10 – Viewshed within 2.5km of the Application Site, as shown in Appendix to LVIA

2.9 The above profiling accords with the viewshed which does not indicate any visibility from suggested viewpoints 1 to 4. It is unlikely that receptors at those locations will have any perception of changes on the site due to the topography, intervening trees and vegetation.

Ashlawn House

Ashlawn Road, Rugby, Warwickshire

Ecological Impact Assessment (EcIA)

February 2026

Document Amendment History

Version	Status	Date	Amendment to this version
V1	Draft	16.10.25	Minor amendments
V2	Draft	22.10.25	Changes to Site plan
V3	Final	26.02.26	N/A

Document Approval

	Name	Title	Signature	Date
Author:	[redacted]	[redacted]	[redacted]	26.02.26
Reviewer:	[redacted]	[redacted]	[redacted]	26.02.26
Authorisation:	[redacted]	[redacted]	[redacted]	26.02.26

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Site Summary

Site / Project Name	Ashlawn House
Site Address	Ashlawn Road, Rugby, Warwickshire, England, CV22 5PS
Grid Ref	[redacted]
Client	[redacted]
Local Authority	Rugby Borough Council
Statutory Designations	None
Non-Statutory Designations	None

Executive Summary

Maydencroft Limited was commissioned by Ross Mayger of Sworders on behalf of Ashlawn Investment Limited to undertake an Ecological Impact Assessment (EcIA) of the habitats on Site at Ashlawn House, Rugby. The appraisal was required to assess the potential ecological constraints affecting the development of a small housing development with associated greenspaces and infrastructure.

To inform this assessment a range of ecological surveys were undertaken including:

- UK Habs habitat Survey;
- Ground Level Tree Assessments (GLTA);
- Preliminary Bat Roost Inspection (PBRA);
- eDNA surveys for Great Crested Newt (GCN);
- Badger walkover survey;
- Japanese Knotweed survey;
- Biodiversity Net Gain Assessment.

The initial survey identified that the Site and its' surroundings have the potential to be utilised by the following protected species: GCN, badgers, nesting birds, hedgehogs, reptiles and roosting, foraging and commuting bats. Of these species, further surveys have confirmed the presence of badger and Japanese Knotweed on Site and the absence of GCN in the waterbodies within 250m of Site. A management plan for the Japanese knotweed has been produced and should be read in conjunction with this report.

The habitats on Site include; modified grassland with scattered trees, woodland, hedgerow, line of trees and urban habitats and are considered likely to support; GCN, badgers, nesting birds, hedgehogs, reptiles and roosting, foraging and commuting bats.

As habitat is to be permanently lost, a Biodiversity Net Gain assessment has been produced to ensure a net gain in biodiversity from the scheme. This should be read in conjunction with this report.

Mitigation measures to protect the habitats within the main site include;

- Follow the results of the BS5837 for retained individual trees, hedgerows, woodlands and lines of trees;
- Follow Arboricultural method statement for removal of single tree.

Recommended further surveys and measures to minimise adverse effects on species/species groups which have the potential to be impacted by the proposed development have been set out herein, along with precautionary measures in respect to species throughout the works. To include:

Bats	*Further surveys* If plans should change at any point to include the removal of trees, aerial inspections should be carried out on those containing PRFs. Otherwise, no further surveys are required. *Mitigation measures* The following lighting mitigation should also be followed. The mitigation is outlined within the Bat Conservation Trust and Institution of Lighting Professional Guidance note: • All works should be undertaken during normal working daylight hours. Any artificial lighting (if absolutely required) should not illuminate the boundary habitats, including the buildings of Ashlawn House to the east of the boundary;

	• Where security lighting is required, it is recommended that these are motion activated with hooded luminaires and directed away from the boundaries, particularly the southern or eastern boundary; • No lighting should fall or be directed on to the boundary vegetation; • Any new temporary or permanent lighting should be designed to avoid light-spill onto the Site boundaries and boundary vegetation. If permanent lighting is to be installed it must follow the principles of mitigation as outlined within the Bat Conservation Trust and Institution of Lighting Professionals Guidance Note. Mitigation • measures for external street lighting will include: • Only luminaires with an upward light ratio of 0% should be used; • All external luminaires used on site should lack UV elements and be warm white coloured (ideally < 2700 Kelvin) to reduce blue-light components; • LED luminaries should be used due to their sharp cut-off, lower intensity, good colour retention and dimming capability; • Where security lighting is installed, this should be motion-activated; • Lights should not be directed at boundary vegetation. Where required, lights can be fitted with hoods, baffles or louvres to reduce back-spill. A lighting design strategy for bats should be created prior to works commencing to ensure that external lighting follows the above recommendations and does not produce excessive light spill.
Badger	*Further surveys* A walkover survey must be undertaken by an Ecologist within 3 months of works commencing to ensure that no new badgers setts have been created or the current setts have been extended. *Mitigation measures* A fenced 30m buffer should be retained around the badger sett throughout the works to ensure no heavy machinery is used within proximity to the sett and possibly collapse tunnels. Any excavations on Site must be covered overnight or a means of escape provided for any badger which may become trapped within the excavation. The excavations, if left open, will need to be inspected daily prior to works commencing. If any equipment or materials are to be stored on site overnight, all possible entrances of said equipment must be blocked and checked for wildlife the following morning prior to work commencing. Please note this only refers to the storage of materials not animal tunnel entrances. If present, the Ecologist should be contacted for advice.
Birds	*Mitigation measures* Vegetation clearance should be undertaken outside bird nesting season i.e. during the period September to February (inclusive – as a guide). If this is not possible, all areas impacted should first be checked for active nests by an ecologist or other suitably qualified individual. In the event that nesting activity is identified, certain aspects of the work in the vicinity of the nest will need to cease until the birds have finished nesting and the young have fledged.
Hedgehog	*Mitigation measures* Any excavations on Site must be covered overnight or a means of escape provided for any hedgehogs which may become trapped within the excavation. The excavations, if left open, will need to be inspected daily prior to works commencing. If any equipment or materials are to be stored on site overnight, all possible entrances of said equipment must be blocked and checked for wildlife the following morning prior to work commencing. Please note this only refers to the storage of materials not animal tunnel entrances. If present, the Ecologist should be contacted for advice.
Reptiles	*Mitigation measures* Due to the small size of the suitable reptile habitat on Site, a presence/absence survey is not required. Instead, it is considered suitable that a Working Method Statement is followed to ensure the safety of reptiles during the proposed development. The Working Method Statement should include for: • Where possible the works should be undertaken in the summer months to ensure reptiles are active and able to move away from heavy machinery;

- All vegetation and scrub that is scheduled for removal or disturbance should be cut utilising a two-phase approach with the presence of an Ecological Clerk of Works (ECoW);

If work during the reptile hibernation period cannot be avoided (mid-October until March, as a guide), the ECoW must remove any hibernacula by hand. If hibernating reptiles are encountered, works must cease.

Species specific compensation also includes:

- Creation of hibernacula along treeline habitats on Site boundary to provide areas of shelter for reptiles;
- Installation of x3 Shwegler 2F Bat Boxes;
- Installation of x3 Shwegler 1B Hole Nest Boxes;
- Installation of x2 'Hedgehog Timeless Haus' along treeline habitats on Site boundary.

No residual effects are anticipated as a result of this development if the aforementioned mitigation measures are followed. In addition, it is recommended that a Construction Environment Management Plan (CEMP) is produced once a Principial Contractor has been appointed, and a finalised work plan has been agreed. This will ensure all ecological matters are managed throughout the construction phase and may identify the need for further ecological monitoring and supervision.

A HMMP will also be required to ensure the habitat creation required to achieve a 10% increase in biodiversity units on Site is appropriately managed for 30 years post-development.

1 Introduction

1.1 BACKGROUND

Maydencroft Limited was commissioned by Ross Mayger of Sworders on behalf of Ashlawn Investment Limited to undertake an Ecological Impact Assessment (EcIA) of the habitats on Site at Ashlawn House, Rugby. The appraisal was required to assess the potential ecological constraints affecting the development of a small housing development with associated greenspaces and infrastructure.

Previous reports undertaken for the proposed development which support the EcIA comprise the Preliminary Ecological Appraisal Report produced by Maydencroft Limited, July 2025. This EcIA has been completed by [redacted]

The PEA involved a site survey which was undertaken on 14th and 15th May 2025 by Ecologist Hannah Yetman of Maydencroft Limited. The desk study and writing components of the report were completed by Ecologist Hannah Yetman.

1.2 SITE DESCRIPTION

The section of land concerned in the survey (referred to as the 'Site' from hereafter) covers an area of approximately 15ha, and is located on the southern edge of Rugby, Warwickshire. The Site is situated approximately 2.5km south of Rugby town centre and is accessed via Ashlawn Road (B4429), which forms its northern boundary.

Immediately adjacent to the west, east and south are open arable fields, with associated treelines, hedgerow and individual trees. To the north, a woodland belt separates Ashlawn House from the road, and further afield, the landscape is dominated by residential properties. To the south, the land slopes gently toward open countryside and the Rainsbrook Valley. The wider landscape is a mix of suburban development and agricultural land, interspersed with hedgerows, treelines, and occasional woodland blocks. The M45 motorway runs in a west–east orientation approximately 700 metres to the south of the Site.

1.3 SITE PROPOSALS

The proposed development is for a small residential site with associated greenspaces and landscaping. Figure 1 identifies the current design for the proposed development.

1.4 AIMS OF THE STUDY

The purpose of the EcIA is to establish key ecological baseline data related to protected and non-protected habitats and species within the area of Ashlawn House so that this can be considered throughout project design and delivery stages in accordance with the ecological mitigation hierarchy.

It also seeks to assess the impact of proposed site changes on ecological receptors in order to devise an appropriate strategy for mitigation and compensation. Equally, the EcIA aims to feed into the design process so that opportunities for biodiversity enhancement are recognised and incorporated wherever possible.

This EcIA covers the following stages:

- Review and summarise designated sites and biological records returned by the desk study;

- Describe the habitats and features present on Site and evaluate their ecological importance;
- Detail the methods and results of the surveys undertaken on Site;
- Outline the legislative and/or policy protection afforded to any habitats or species of importance likely to be associated with the Site;
- Discuss the predicted impacts on ecological receptors in the absence of mitigation, with recommendations for mitigation measures following the 'mitigation hierarchy' to avoid, reduce or compensate for these impacts.
- Set out recommendations for ecological enhancement measures.

In addition to the standard EcIA approach, the scope of works extended to undertaking a Biodiversity Net Gain (BNG) assessment and Statutory Metric calculation in order to establish a quantitative baseline. This data will help to track the future achievements of habitat enhancement by demonstrating unit change in the Metric.



Figure 1: Proposed Site Plan

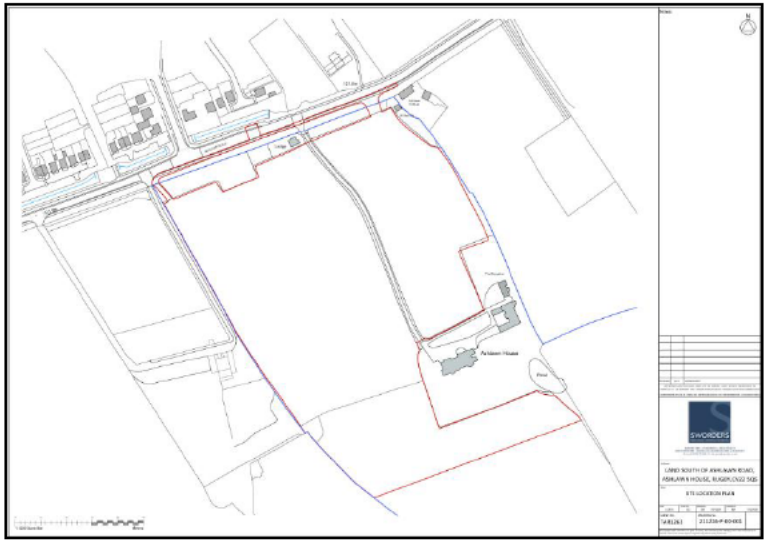


Figure 2: Location of the Site (red line).

2 Planning Policy & Legislation

2.1 NATIONAL PLANNING POLICY

The National Planning Policy Framework (NPPF) states that the planning system should 'contribute to and enhance' the natural and local environment by, in part;

- Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity.

Other key principles of the NPPF which relate to biodiversity are;

- The conservation of international and national statutorily designated sites;
- Protection of ancient woodland and veteran trees;
- The creation, protection, enhancement and management of networks of biodiversity and green infrastructure;
- The preservation, restoration and recreation of priority habitats and ecological networks, and;
- The recovery of priority species populations.

The NPPF provides information relating to the approach to be taken within the planning system, including the production of Local Development Plans and the determination of planning applications for Local Planning Authorities. The principles set out within this framework should be reflected at a local level in Local Development Frameworks and other planning policy documents for that area.

2.2 LOCAL PLANNING POLICIES

2.2.1 District Council Local Plan

The Rugby Borough Council Local Plan 2011-2031 contains planning policies which relate to ecology, biodiversity and/or nature conservation. Those which are considered potentially relevant to the Site are listed below:

Policy NE1: Protecting Designated Biodiversity and Geodiversity Assets

The Council will protect designated areas and species of international, national and local importance for biodiversity and geodiversity as set out below.

Development will be expected to deliver a net gain in biodiversity and be in accordance with the mitigation hierarchy below. Planning permission will be refused if significant harm resulting from development affecting biodiversity cannot be:

- Avoided, and where this is not possible;
- Mitigated, and if it cannot be fully mitigated, as a last resort;
- Compensated for.

<u>Sites of International and European Importance</u>

Development that is likely to result in an adverse effect on the integrity of any European site (either alone or in combination), will not be permitted unless:

- There are no alternative solutions; and
- There are imperative reasons for overriding public interest; and

- Adequate compensatory measures can be taken to ensure the overall coherence of Natura 2000 is protected.

As per the requirements of the Habitat Regulations.

Sites of International or European Importance Include: Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites.

Sites of National Importance

Development affecting nationally important Sites of Special Scientific Interest (SSSIs) either directly or indirectly will only be permitted in exceptional circumstances where the benefits of development clearly outweigh the impacts on the site or species.

Sites of Local Importance

Development likely to result in the loss, deterioration, degradation or harm to habitats or species of local importance to biodiversity, geological or geomorphological conservation interests, either directly or indirectly, will not be permitted for Local Nature Reserves (LNRs); Local Wildlife Sites (LWS), Local Geological Sites (LGS), European and UK protected species, or Biodiversity Action Plan habitats unless:

- The need for, and benefits of, the development in the proposed location outweighs the adverse effect on the relevant biodiversity interest. All Development proposals impacting on local wildlife sites will be expected to assess the site against the 'Green Book' criteria to determine the status of the site and to ascertain whether the development clearly outweighs the impacts on the site;
- It can be demonstrated that it could not reasonably be located on an alternative site that would result in less or no harm to the biodiversity interest; and
- Measures can be provided (and secured through planning conditions or legal agreements), according to the mitigation hierarchy as set out above. The level of protection and mitigation should be proportionate to the status of the habitat or species and its importance individually and as part of a wider network.

Ancient Woodland

Planning permission will be refused for development resulting in the loss or deterioration of ancient woodland, and/or the loss of aged or veteran trees found outside of ancient woodland unless the need for, and benefits of, the development in that location clearly outweighs the loss.

All development proposals in the proximity of ancient woodland shall incorporate buffers having regard to Natural England's standing advice.

Ecological Assessment

All proposals likely to impact on the sites noted above will require an Ecological Assessment. The Ecological Assessment shall include due consideration of the importance of the natural asset, the nature of the measures proposed (including plans for long term management) and the extent to which they avoid and reduce the impact of the development.

The Green Book: Guidance for the Selection of Local Wildlife Sites in Warwickshire, Coventry and Solihull (2015) Local

Wildlife Sites Project: Habitat Biodiversity Audit for Warwickshire.

Policy NE2: Strategic Green and Blue Infrastructure

The Council will work with partners towards the creation of a comprehensive Borough wide Strategic Green and Blue Infrastructure Network which is inclusive of the Princethorpe Woodland Biodiversity Opportunity Areas (also known as the Princethorpe Woodlands Living Landscape), as shown on the Green and Blue Infrastructure Policies Map. This will be achieved through the following:

- The protection, restoration and enhancement of existing and potential Green and Blue Infrastructure assets within the network as shown on the Policies Map; and
- The introduction of appropriate multi-functional corridors between existing and potential Green and Blue infrastructure assets.

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

Where such provision is made a framework plan should be produced as part of the planning application demonstrating the contribution to the overall achievements of the multi-functional strategic Green and Blue Infrastructure network. A management plan, based on delivering the framework plan and detailing how the infrastructure will be.

2.2.2 *Emerging district council local plan*

The Rugby Borough Preferred Option Consultation (March 2025) also contains planning policies which relate to ecology, biodiversity and/or nature conservation. Those which are considered potentially relevant to the Site in the future are listed below:

Policy EN1: Biodiversity and geodiversity protection

A. National policy and legislation will be applied in determining planning applications that have potential to harm biodiversity. The mitigation hierarchy in national policy of avoid, mitigate, compensate will be applied.

B. National policy and legislation will be applied to development that affects a Site of Special Scientific Interest (SSSI), protected species or irreplaceable habitat (such as ancient woodland and ancient or veteran trees).

C. Development likely to result in harm to or the loss of a Local Wildlife Site, Local Nature Reserve or Local Geological Site will not be permitted unless:

i. the need for or benefits of the development demonstrably outweigh the harm to the ecological/geological interest of the site; and

ii. it can be demonstrated that the development could not reasonably be located on an alternative site that would cause less harm; and

iii. the harm is minimised and mitigated or compensated for in accordance with the mitigation hierarchy.

Policy EN4: Biodiversity Net Gain

A. Biodiversity net gain under Part 6 of the Environment Act 2021 shall be delivered:

i. on site; or, if the required gain cannot all be delivered on-site

ii. off-site in a location as close as feasible to the site that would contribute to habitat connectivity and the biodiversity priorities identified in the Local Nature Recovery Strategy; or if that is not possible

iii. off-site but within Rugby Borough in a location that would contribute to habitat connectivity and the biodiversity priorities in the Local Nature Recovery Strategy; or

iv. if it is demonstrated that there are no opportunities to deliver the gain within the borough, through off-site credits elsewhere or as a last resort statutory biodiversity credits.

2.2.3 *Local Biodiversity Action Plan*

Habitats and species of principle importance (Priority Habitats) in the UK are listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

Actions that need to be undertaken in order to maintain and/or enhance the nature conservation status of these habitats and species are implemented at a local level in the County Local Biodiversity Action Plan (LBAP), Warwickshire, Coventry and Solihull Local Biodiversity Action Plan.

Habitats of importance:

- Ancient Woodland
- Strategic River Corridors
- Hedgerows, treelines, and field margins
- Parkland and veteran trees
- Grasslands and meadows

Species of importance

- Bluebell *(Hyacinthoides non-scripta)*
- Adder's-tongue Fern *(Ophioglossum vulgatum)*
- Green-winged Orchid *(Anacamptis morio)*
- Skylark *(Alauda arvensis)*
- Song Thrush *(Turdus philomelos)*
- House Sparrow *(Passer domesticus)*
- Starling *(Sturnus vulgaris)*
- Barn Owl *(Tyto alba)*
- Lapwing *(Vanellus vanellus)*
- Bats (all UK bat species, including Pipistrelle, Brown Long-eared, and Noctule)
- Hedgehog *(Erinaceus europaeus)*
- Otter *(Lutra lutra)*
- Water Vole *(Arvicola amphibius)*
- Great Crested Newt *(Triturus cristatus)*
- Common Toad *(Bufo bufo)*
- Grass Snake *(Natrix helvetica)*
- White-letter Hairstreak *(Satyrium w-album)*
- Small Heath Butterfly *(Coenonympha pamphilus)*
- Stag Beetle *(Lucanus cervus)*

2.3 LEGISLATION

2.3.1 *European Legislation*

The Bern Convention (The Convention on the Conservation of European Wildlife and Natural Habitats) was adopted in

1979 and came into force in 1982. To implement this agreement, the European Community adopted the EC Habitats Directive.

The EC habitats directive has been transposed into UK legislation by the Wildlife and Countryside Act (WCA) 1981 (as amended) and the Conservation of Habitats and Species Regulations, 2017. The Countryside and Rights of Way Act (CRoW) 2000 strengthened the existing wildlife legislation in the UK.

The UK has also signed The Bonn Convention (The Convention on the Conservation of Migratory Species of Wild Animals) and is therefore party to various agreements.

2.3.2 *National Legislation*

The WCA 1981, as amended by the CRoW 2000 and NERC Act 2006, consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive).

The WCA gives protection to native species (especially those under threat), controls the release of non-native species, enhances the protection of SSSIs and builds upon the rights of way rules in the National Parks and Access to the Countryside Act 1949.

The NERC Act places a duty on authorities to have due regard for biodiversity and nature conservation during the course of their operations. Please see *Appendix C* for protected species legislation relevant to the Site.

3 Methodology

3.1 GUIDELINES FOR ECOLOGICAL IMPACT ASSESSMENT

This report has been produced based on the Guidelines for Ecological Impact Assessment (Chartered Institute of Ecology and Environmental Management, 2019). It includes an overview of Phase 1 and Phase 2 ecology surveys and identifies, quantifies and evaluates the potential effects of the development on habitats, species and ecosystems on Site.

3.2 SCOPE OF THE ASSESSMENT

This assessment has been produced to identify which ecologically important features lie within the zone of influence (ZoI) of the proposed development and to assess how they will be impacted by the proposed works. Ecologically important features considered within this assessment include statutory and non-statutory designated sites, protected and important species and habitats.

Important ecological features have been identified and assessed against potential environmental changes to which they are likely to be sensitive, considering the spatial and temporal scope of the proposed development. The ZoI of the proposed development differs depending on the ecological features and other factors such as time of year, time of day, hydrological connectivity, and/or the life stage of a species (CIEEM, 2018). Therefore, the ZoI for each ecological features is not listed but is referred to in the assessment when necessary.

The desk study area to inform the ZoI was defined as within:

- International statutory designated sites within 2km;
- National statutory sites within 1km;
- Non-statutory sites within 1km;
- Protected and important species and habitats within a 1km radius of the Site.

The survey area of the field survey was informed by ZoI and was defined as:

- Habitats present on Site and those of interest surrounding the Site;
- Invasive non-native species list under Schedule 9 of the Wildlife and Countryside Act 1981 present within the Site boundary;
- Reptile habitat and presence on Site;
- Bat roosts on Site;
- Foraging and commuting habitats for bats on Site and in the bordering hedgerows and trees;
- Badger setts and foraging habitats on Site and within the surrounding hedgerow and woodland habitats;
- Great crested newt habitat on Site and within 250m of the Site;
- Common nesting birds present on Site and on the habitats surrounding the Site;
- Hedgehog habitats present on Site and within the boundaries.

3.3 DESK STUDY

To provide contextual background to this project, a desk study was undertaken in May 2025 to search for the following:

- International statutory designated sites within 2 km;
- National statutory sites within 2km;
- Non-statutory sites within 1km;
- Protected and important species and habitats within a 2km radius of the Site.

These 'study areas' were considered appropriate for the scale of the proposed works and follow best practice guidance. The desk study was conducted using online sources such as Magic Map alongside data on protected/notable species and local sites from Northamptonshire Biodiversity Records Centre and Warwickshire Biodiversity Records Centre. The data was returned on 29th May 2025.

3.4 HABITAT SURVEY

The site survey was undertaken on 14th-15th May 2025 by Ecologist, Eleanor Pawley. The weather during the survey was sunny with sporadic cloud and wind. The survey involved an assessment of the habitats and a search for indicative evidence of habitual use by protected and important species.

3.5 BATS

3.5.1 Preliminary Bat Roost Assessment

A site survey was carried out on 17th June 2025 by Hannah Yetman, Ecologist of Maydencroft Limited. The survey was conducted to assess the potential of the building on site to support roosting. The survey was conducted following best practice guidance (BCT 2023), as shown in Table 1. The weather during the survey was warm and sunny, with minimal cloud cover.

The building was inspected externally from ground level using binoculars, to identify potential ingress and egress points for bats. Internal access could not be arranged. The survey also looked for evidence of bats including the presence of roosting bats, droppings, scratch marks, staining and feeding remains.

Best practice guidance was utilised to assign suitability (BCT, 2023) based on the number and type of features identified within the building. Table 1 details the suitability categories.

Table 1: Guidance for assessing potential suitability of buildings for bats (BCT, 2023)

Suitability	Description
None	No habitat features on site likely to be used by any roosting bats at any time of the year.
Negligible	No obvious habitat features on site likely to be used by roosting bats, however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitats but unlikely to support a roost of high conservation status.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitats. These structures have the potential to support high conservation status roosts – maternity or hibernation

3.5.2 *Ground Level Tree Assessment*

A GLTA was undertaken on Site on 14th and 15th May and 2nd June 2025 by Eleanor Pawley and Hannah Yetman, Ecologists of Maydencroft Limited. The GLTA included a ground-level search for PRF on the trees present on Site. The surveyors were equipped with; binoculars, a laser clinometer, diameter at breast height tape and surveying forms. The survey was conducted following best practice guidance (BCT 2023, BTHK, 2024).

Table 2: Guidance for assessing potential suitability of trees for bats (BCT, 2023)

Suitability	Description
Negligible	Either no PRFs in the tree or highly unlikely to be any
FAR	Further assessment required to establish if PRF are present in the tree
PRF-I	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitat
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony

Information collected about the tree included: phase 1 habitat type, tree species, tree height, whether the tree is alive/dead, diameter at breast height, and number of stems present. Information collected about the PRFs included: whether the PRF is on the stem or limb, the PRF type, height and facing direction of PRF and its suitability (descriptions shown in Table 2).

3.6 GREAT CRESTED NEWT

eDNA surveys were carried out following the protocol provided by the external laboratory that provided and tested the eDNA kits. Twenty samples were collected from around the lagoon's perimeter, spaced as evenly as possible. Samples were collected using a 30mL ladle and then emptied into a Whirl-Pak bag. Once all 20 samples were collected, the Whirl-Pak bag was shaken for 10 seconds. 15mL of water was then transferred using a pipette into six tubes containing preserving fluid. These samples were kept cool before being sent to the laboratory for analysis.

The eDNA surveys were conducted by Lorena Sinclair and Loren Choy at Maydencroft Limited on 25th June 2025.

3.7 BADGER

A badger walkover survey was undertaken on 27th August 2025 by Eleanor Pawley, Ecologist of Maydencroft Limited. The Site and suitable habitats within 30m of its boundary were checked for field signs of badger in late August in line with Badger Trust best practise guidance. The following field signs were recorded:

- Setts: Look for entrance holes, spoil heaps, and bedding material.
- Mammal paths: Well-worn paths indicate frequent use by badgers.
- Latrines: Small pits or dung piles used for defecation.
- Hair: Badger hair caught on fences or vegetation.
- Footprints: Recognizable tracks in soft ground.
- Foraging Signs: Scrapes and snuffle holes where badgers have searched for food.

The location of any field signs was recorded using GPS, along with photographs and detailed notes on the field sign found. No limitations were noted during this survey.

3.8 ASSESSMENT

Significance has been determined within geographical contexts and the legal protection afforded to habitats and species within those geographical contexts. The geographical importance of each habitat and species within the ZoI. Table 3 outlines the criteria utilised to assess the importance of ecological features.

Ecological impacts were determined following the below criteria:

- Positive or negative impact
- Extent of the impact
- Magnitude of the impact
- Duration of the impact
- Frequency and timing of the impact
- Whether the impact is reversable or not.

The assessment will only discuss the characteristics of the impact where they are relevant to determining the significance of the impact.

Table 3: Geographic importance of habitats and species (CIEEM 2018)

Geographic importance	Description
International	Natura 2000 sites such as Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites are considered to be of international importance. Areas of habitats or populations of species which would qualify for Natura 2000 site status but is not currently designated. (ie the amount of habitat present or number of species present meet the criteria for designation) are considered internationally important.
National	Sites of Special Scientific Interest (SSSI) or National Nature Reserves (NNR) are considered to be of national importance. Areas of habitats or populations of species which meet the criteria for SSSI designation but are not yet designated, are considered to be of national importance.
	All areas of ancient woodland and all veteran trees are considered to be of national importance. Habitats and Species of Principal Importance within the NERC Act (2006) are considered to be of national importance.
County	Non-statutory designated sites are determined to be of county importance.
Local	Common and widespread habitats and species within the study area in proportions greater than may be expected in the local context.
Negligible	Common and widespread habitats and species within the study area which do not exceed those of the surrounding area. Areas of urban or heavily modified habitats.

A significant effect is an effect that either supports or undermines biodiversity conservation objectives for important ecological features or for biodiversity in general (CIEEM 2018). Where significant effects are present, they have been classified at an appropriate geographic scale.

3.8.1 *Mitigation hierarchy*

The mitigation hierarchy is comprised of four principals: avoidance, mitigation, compensation and offset to enhance biodiversity. Throughout the project, the mitigation hierarchy has been followed, where possible, impacts have been avoided. Where they could not be avoided sufficient mitigation has been outlined. Where mitigation is not sufficient, compensation and enhancements have been recommended.

3.9 SURVEYOR QUALIFICATIONS

- [redacted] *has over four years of professional survey, reporting, consultancy and project management experience. She also holds Level 1 Class Licences for Great Crested Newt and Bat and is a certified tree climber.*
- [redacted] *has over two years' experience of carrying out a wide variety of ecological surveys and producing ecological reports. She is also a PCA Certified Surveyor of Japanese Knotweed (CSJK), holds a Level 1 Great Crested Newt licence and Bird Ringing C Permit.*
- [redacted]
- [redacted]

4 Baseline Ecological Conditions

4.1 DESIGNATED SITES

4.1.1 *International Statutory Sites*

No statutory sites of designated international importance were identified in the search area.

4.1.2 *National Statutory Sites*

Ashlawn Railway Cutting Local Nature Reserve (LNR) lies approximately 700m east of Site and covers an area of roughly 5.8ha. It is a Steep-sided railway cutting with limestone grassland and a mosaic of scrub. Notable species occurring include green-winged orchid (*Orchis morio)*, broomrape (*Orobanche minor)*, grass pea (*Lathyrus sativus)* and adder's tongue fern (*Ophioglossum vulgatum)*. The site includes grassland, scrub, ponds and marsh. It is a good site for butterflies and moths, whilst a range of bird species have been noted, including lesser spotted woodpecker (*Dendrocopos minor*).

The Disused Railway LNR is a 20ha strip of disused railway with interesting geology located 800m east of the Site. The site is very varied, with an often-intricate mosaic of grassland, wetland, trees and scrub. The site is of importance for invertebrates, birds and flora.

Dunchurch Ecological Park (Cock Robin Wood) LNR is a small plantation woodland with a number of rides and glades, as well as a few ponds. It contains oak (*Quercus sp*), ash (*Fraxinus excelsior*), rowan (*Sorbus aucuapria*), cherry (*Prunus sp.*), field maple (*Acer campestre*), willow (*Salix sp.*) and alder (*Alnus glutinosa*), with an understorey of hazel (*Corylus avellana*), guelder rose (*Viburnum opulus*), blackthorn *(Prunus spinosa*) and hawthorn (*Crataegus monogyna*). Open grassy areas contain a good range of grass and herb species. It is approximately 4.4ha and located 1km west of Site.

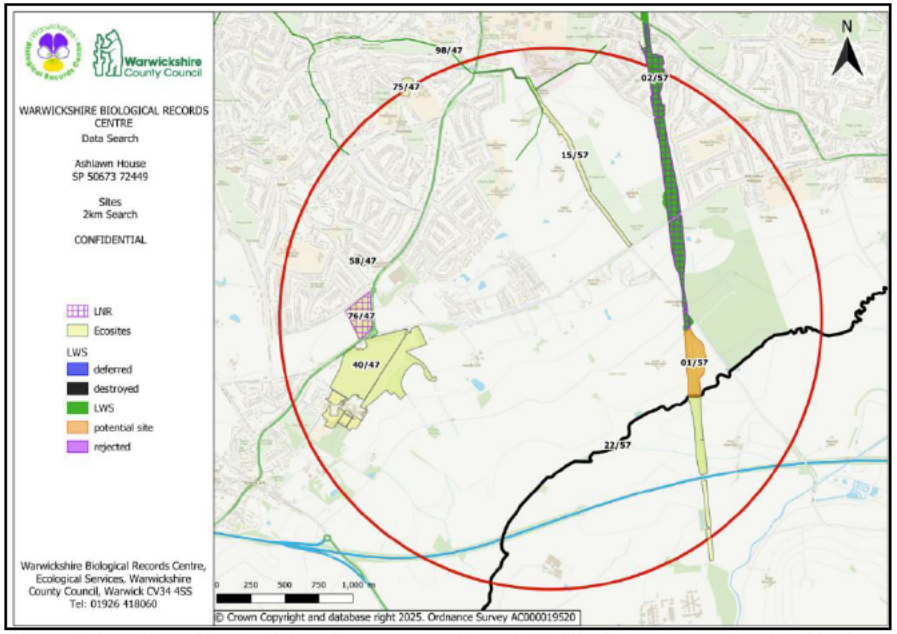


Figure 1: Location of Local Nature Reserves and Local Wildlife Sites surrounding the Site from WBRC

4.1.3 *Non-Statutory Sites*

Sow Brook and Barby Road LWS is a 1.5km long watercourse and roadside verge, supporting a range of flora and fauna, located 500m northeast of the Site.

Bilton Grange grounds Ecosite is a 29ha school grounds with associated woodland and is located 650m southwest from Site.

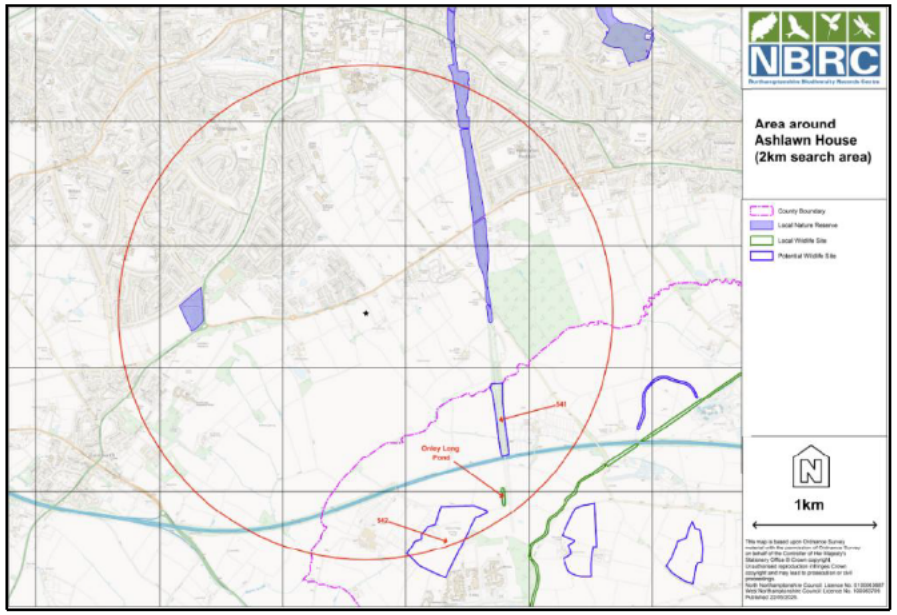


Figure 4: Location of Local Sites surrounding the Site from NBRC

4.2 HABITATS

4.2.1 *Modified grassland with scattered trees (g4, 32)*

Map reference 1

This habitat parcel is in the northeastern corner of the Site and comprises species-poor, heavily grazed grassland with limited structural diversity. Frequent areas of bare ground are present, particularly around horse feeding and watering points. The sward is dominated by perennial ryegrass (*Lolium perenne*), with other common species including creeping buttercup (*Ranunculus repens*), common plantain (*Plantago major*), dandelion (*Taraxacum officinale* agg.), white clover (*Trifolium repens*), dock (*Rumex* spp.), daisy (*Bellis perennis*), nettle (*Urtica dioica*), and ragwort (*Jacobaea vulgaris*).

There are thirteen scattered trees that occur throughout the parcel, including several small groups and isolated individuals. Tree stumps are also present, indicating previous felling activity. Most of the standing trees are mature small-leaved lime (*Tilia cordata*), many of which exhibit dense epicormic growth along their stems. Further details of individual trees are provided in Table 4 below.

Table 4: Individual trees present within modified grassland in map reference 1

Tree number	Species	Diameter (cm) at 1.5m height	Description
T3	Small-leaved lime	92	An individual mature tree with dense epicormic growth on the stem. The crown is of a natural size and contains standing deadwood.
T4 – T8	Small-leaved lime (*Tilia cordata*)	70	A group of five mature trees with dense epicormic growth along their stems. Crowns contain standing deadwood.
T20	Small-leaved lime	85	An individual mature tree with dense epicormic growth on the stem. The crown is of a natural size and contains standing deadwood.
S21 & S22	Small-leaved lime	80	Stumps of two felled trees. The trees are still alive, with new growth shooting.
T25	Small-leaved lime	87	A mature tree within a group. It has little epicormic growth. The crown contains deadwood and rot holes are present within the stem.
T26	Small-leaved lime	88	A mature tree found within a small group. It has dense epicormic growth on the stem. The crown contains standing deadwood.
T27	Small-leaved lime	85	A mature tree found within a small group. The crown contains standing deadwood.
T28	Horse-chestnut (*Aesculus hippocastanum*)	83	A mature individual tree. The crown contains deadwood and rot holes are present within the stem.

Map reference 2

This habitat parcel is comprised of modified grassland, which occupies the majority of the site. At the time of the survey, the area was actively grazed by cattle, resulting in a generally short sward with no tussock formation. Patches of bare ground were observed, particularly around feeding and watering locations where trampling was most intense.

The grassland flora includes a mix of grass and herb species typically associated with improved or semi-improved pasture. Notable species present include Canada bluegrass (*Poa compressa*), meadow foxtail (*Alopecurus pratensis*), common hawkbit (*Leontodon taraxacoides*), dandelion (*Taraxacum officinale agg.*), white clover (*Trifolium repens*), perennial ryegrass (*Lolium perenne*), common nettle (*Urtica dioica*), creeping thistle (*Cirsium arvense*), and spear thistle (*Cirsium vulgare*). These species indicate a nutrient-enriched sward under regular grazing pressure.

Scattered throughout the parcel are several trees, some occurring in small groups while others stand individually. Evidence of past tree removal is present in the form of cut stumps. The dominant tree species is mature small-leaved lime (*Tilia cordata*), many of which exhibit dense epicormic growth along their trunks — a characteristic often linked to

historic pollarding or other management interventions. Further information on these trees is provided in Table 5 below.

Table 5: Individual trees present within modified grassland in map reference 2.

Tree number	Species	Diameter (cm) at 1.5m height	Description
T39, T37, T38	Small-leaved lime	81	A group of three mature trees with extensive epicormic growth on their stems. All trees have deadwood in their crowns, tree 23 has a rot hole present in addition to the deadwood.
T31	Horse chestnut	110	A single mature individual tree. Whilst the tree maintains 75% of the expected canopy spread for a tree of its age, a minimal amount of pruning was noted on the lower branches. Ecological niches are present including a rot hole in the stem and a large fissure on a branch.
T30	Small-leaved lime	81	A mature individual tree with a crown of a natural size and containing standing deadwood.
T66	N/A	90	A stump of a felled tree. No regrowth was visible so species ID was not possible.
S53, S54, S55, S56, S57	N/A	70	A group of five tree stumps with no regrowth.
S58, S59	N/A	80	Stumps of two felled trees. No regrowth was visible so species ID was not possible.
S60	N/A	62	A tree stump with no visible regrowth. Species ID not possible.
S33	N/A	92	A tree stump with no visible regrowth. Species ID not possible.
S32	N/A	120	A tree stump with no visible regrowth. Species ID not possible.
T43, T44, T45	Small-leaved lime	70	A group of mature trees with dense epicormic growth on their stems.
T51	Hawthorn (*Crataegus monogyna*)	20	A multi-stemmed mature tree with flakey bark, creating ecological niches.
T52	Horse chestnut	90	A mature tree of a natural size for its age. It contains natural ecological niches and is oversailing vegetation below.
T67	Beech (*Fagus sylvatica*)	20	A semi-mature tree found in a fenced off area of tall vegetation on the western boundary of the Site. There is evidence that this tree has been adversely affected by human activities.
T68, T69	Small-leaved lime	25	A semi-mature small leaved lime that is in poor health.
T70, T71, T72	Small-leaved lime	70	A group of three mature trees of the same age and condition. There is dense epicormic growth on the stems and deadwood in the crowns.
T73	Horse chestnut	77	A mature individual tree.
T74	Small-leaved lime	58	A mature individual tree of a natural canopy spread for its age. Although it is in good general health, ecological niches are present in the form of standing deadwood and epicormic growth.
T75, T76, T77	English oak	25	A group of three semi-mature trees, of natural size and condition for their age.
T78	Ash (*Fraxinus excelsior*)	96	A mature tree showing signs of ash dieback (*Hymenoscyphus fraxineus*) in the tips of its branches. The crown contains standing deadwood and there are rot holes present in the stem.

Tree number	Species	Diameter (cm) at 1.5m height	Description
T79	Willow (*Salix sp.*)	28	A semi-mature tree within a group. It has significant damage to its lower stem, probably caused by human activities.
T80, T81	Hawthorn	15	Two mature trees found within a larger group. They both have standing deadwood and flakey bark on their stems.
T82	Willow	65	A mature willow tree with significant decay features.
T83	Copper beech (*Fagus sylvatica f. purpurea*)	63	A non-native mature tree of a natural size for its age. Despite being mature, it is yet to develop any decay features that may provide ecological niches.

Map reference 3

A small section of grassland in a fenced off area of the western field. There are log and timber piles concealed beneath the tall forbs. The sward height is uniformly long. Common nettle and cow parsley are the dominant species.

The grassland within map reference 1, 2 and 3 do not qualify as Habitats of Principal Importance (HPI) and are not considered ecologically significant. In addition, the scattered trees across the areas do not qualify as HPI's however, are considered ecologically significant at a local level.

4.2.2 *Other broadleaved woodland (w1g)*

Map reference 4

A parcel of woodland is present at the most southerly extent of the Site. The canopy consists of mature ash and oak trees. The understory is formed by dense scrub, particularly around its perimeter. Field maple, blackthorn, hawthorn, bramble and willow are present. The ground layer is comprised of nettle only.

Map reference 5

A narrow strip of woodland runs along the northern boundary of the estate, forming a linear belt adjacent to the roadside. The canopy is dominated by small-leaved lime. with additional tree species including ash, copper beech (*Fagus sylvatica* 'Purpurea'), horse chestnut, and English oak.

The understorey comprises elder (*Sambucus nigra*), holly (*Ilex aquifolium*), hawthorn, and bramble (*Rubus fruticosus* agg.). The ground flora is characterised by a mix of common woodland species such as nettle (*Urtica dioica*), cleavers (*Galium aparine*), germander speedwell (*Veronica chamaedrys*), herb-Robert (*Geranium robertianum*), red campion (*Silene dioica*), burdock (*Arctium* sp.), and Spanish bluebell (*Hyacinthoides hispanica*).

Map reference 6

A narrow strip of woodland is located in the northeast of the site, positioned to the south of the main road. The canopy is dominated by mature English oak, with ash and field maple also present. The understorey is composed primarily of hawthorn, field elm, and ash saplings. Ground flora is relatively sparse and consists mainly of common nettle and common hogweed.

The woodlands on Site do not qualify as HPIs however, are considered to be of ecological importance at a local level.

4.2.3 *Native hedgerow (h2a)*

The access track leading to the main house is flanked on both sides by linear hedgerows, which serve as boundaries separating the track from the adjacent fields. Both hedgerows are similar in species composition and overall condition. They measure approximately 1.5m in width and reach a height of around 3m. Beech is the dominant species throughout, with occasional presence of hawthorn and elder (*Sambucus nigra*).

Another hedgerow is present along the main road to the east of the Site. The hedgerow is approximately 1m height and 1m wide. The hedgerow is species-rich and comprised of hawthorn, field maple, blackthorn, bramble and elder. A single mature oak tree is present within the hedgerow on the northern boundary of the Site. The tree has extensive storm damage and hollowing of the main stem.

The hedgerows on Site qualify as HPI "Hedgerow" and are therefore, considered ecologically significant at a regional level.

4.2.4 *Line of trees (w1g6, 33)*

A line of mature English oak trees is located along the northern boundary of the site, adjacent to the main road. The trees are spaced closely together, forming a continuous canopy line. Many of the individuals exhibit valuable ecological features, including areas of deadwood, which provide potential niches for a variety of fauna such as invertebrates, birds, and bats.

The line of trees does not qualify as a HPI however, is considered ecologically significant at a local level.

4.2.5 *Urban habitats (u)*

An access track is present running through the centre of the Site to Ashlawn House (u1e). In addition, a house and garden are present on the northern boundary of the Site. These habitats are not considered ecologically significant and do not qualify as HPIs.

4.2.6 *Invasive Non-Native Species*

Along the northeastern boundary with Ashlawn House, a small patch of Japanese Knotweed was present on the house side of the boundary. Japanese knotweed is scheduled under Schedule 9, Part II of the Wildlife and Countryside Act making in an offence to plant or cause it to grow in the wild.

4.2.7 *Habitats adjacent Site*

The Site is bordered to the north by a new housing development and grassland, to the east is an abundance of grassland and arable land. The south and west are also dominated by grassland and arable land. An area to the northwest is currently an active construction site where works to construct 25 new dwellings are about to start. None of the habitats adjacent to the Site are considered HPIs or ecologically significant.

4.4 SPECIES

4.4.1 *Amphibians*

4.4.1.1 Desk study

Six records of six great crested newt (GCN) were returned in the data search. The closest and most recent record was located 1km north east of the Site in 2022, across arable fields and connecting treeline and hedgerow.

Magic Map was used to search for Great Crested Newt Granted European Protected Species Applications and Great Crested Newt Pond Surveys 2017 – 2019 within the search area. Two records were returned with the closest being 1.5km south east of the Site in 2017 (Case reference: 2017-29005-EPS-MIT).

13 records of a total number of 56 smooth newt *(Lissotriton vulgaris)*, 170 common frog *(Rana temporaria)* and 20 common toad *(Bufo bufo)* were also returned from the data search. The closest record of the smooth newt was found 300m north of the Site in 2024. A residential estate has since been built on the land surrounding the pond. The most recent recording of smooth newt is from 2022 and located 1.4km north west.

4.4.1.2 Site suitability

Some habitats on Site are considered suitable for GCN and other amphibians. Due to the grazed nature of the grassland, GCN are unlikely to utilise these habitats as they provide no suitable cover. However, the hedgerows, woodland, and treelines on Site provide suitability for both sheltering/hibernating amphibians and foraging/commuting amphibians.

Seventeen waterbodies are present within 500m of the Site. Six ponds and one ditch are present within 250m of the Site. Due to the number of ponds present within the locality, the habitats of suitability on Site and surrounding the Site and the local records of GCN on Site, further GCN surveys were recommended to determine presence/likely absence of GCN on Site. Due to the presence of minor barriers such as main roads, housing developments and large expanses of arable fields, only ponds within 250m of the Site were due to be surveyed. However, access constraints meant that only a limited number of ponds within the 250 m buffer could be surveyed, necessitating the inclusion of several ponds located outside this area. All relevant landowners within the 250 m vicinity were contacted to request access. BoBen Construction, who manage the land containing Ponds 2 and 3 to the west of the Site and which is currently under construction, declined access but provided photographic evidence confirming that Pond 2 no longer holds water, along with the eDNA survey results submitted for their planning application, which were negative. Mr Galliford, representing the landowner of Pond 4, also declined access. Attempts to contact the landowner of Pond 7 were made, but no response was received.

4.4.1.3 eDNA survey results

Figure 5 identifies the ponds within 250m and those surveyed further to the north due to lack of access. Table 6 identifies the ponds within the survey area, any access restrictions and the results of the eDNA surveys.

Table 6: Ponds within 250m of the Site, restrictions and results of eDNA surveys

Pond	Distance from Site	Access restrictions	Result
P1	11m, east of Site	No restrictions	Negative
P2	20m, west of Site	Access was requested but denied by landowners. No longer holds water.	No survey conducted. However, photographic evidence provided by land owner confirms that the pond no longer holds water.
P3	80m, west of Site	Access was requested but denied by landowners.	No survey conducted. However, surveys had been undertaken previously for planning permission (R23/0491) which confirmed GCN absence within the pond.
P4	197m to the east of Site	Access was requested but denied by landowners.	No survey conducted.
P5	258m to the east of Site	No restrictions	Negative
P6	219m to the northeast of Site	No restrictions	Negative
P7	295m southeast of Site.	Access was requested but denied by landowners.	No survey conducted.
Ditch 1	15m to north of Site	Dry	No survey conducted.
P8	285m to the northeast of Site	No restrictions	Negative
P9	423m to the northwest of Site	Dry	No survey conducted.
10	448m to northwest of Site	No restrictions	Negative
P11	435m to north of Site	Dry	No survey conducted.
P12	454m to the north of Site	Dry	No survey conducted.



Figure 5: Ponds within survey area (Included as Appendix F)

4.4.2 Bats

4.4.2.1 Desk study

58 records of a bat were returned in the data search. These consisted of common pipistrelle *(Pipistrellus pipistrellus)*, soprano pipistrelle *(Pipistrellus pygmaeus)*, Natterer's Bat *(Myotis nattereri)*, Noctule Bat *(Nyctalus noctula)*, and brown long eared bat *(Plecotus auritus)*. The closest record was of common pipistrelle which was recorded in 2016, 30m west of Site, foraging in the adjacent field. The most recent record

was also of common pipistrelle in 2022, approximately 1.3km north west of Site.

Magic Map was used to search for Bat Granted European Protected Species Applications within the search area. Two records were returned with the closest being 1.3km north east of the Site in 2019 (Case reference: 2019-40081-EPS-MIT).

4.4.2.2 Site suitability

The habitats on Site are considered suitable for foraging and commuting bats due to the presence of linear features such as hedgerows and treelines, and woodland. As the grassland is grazed, a high population of invertebrates is not expected to be present, reducing its suitability for foraging bats. Additionally, water sources are present within the locality and the habitats in the locale are also considered suitable for bats. As such, the Site is considered to be of high suitability for foraging and commuting bats.

Due to the presence of a number of trees on Site as well as historical buildings, roosting bats could not be discounted from Site, as such, a PBRA and GLTA were conducted on Site.

4.4.2.3 Ground Level Tree Assessment

A GLTA was conducted within the boundaries of the Site. Figure 6 identifies the trees with PRF which were subject to the GLTA and Appendix D outlines the results of the survey.

A number of trees on Site were identified as containing potential roosting features for bats and therefore, roosting bats cannot be discounted from the Site.

PRF-I indicates that the features are considered suitable for individual or low numbers of bats. FAR indicates further assessment is needed to determine suitability. PRF-M, or Moderate suitability, refers to features that are suitable for multiple bats and may support important roosts such as maternity colonies, making them of higher conservation concern.



Figure 6: Trees subject to Ground Level Tree Assessment on Site (Included as Appendix G)

4.4.2.3 Preliminary Bat Roost Assessment

Building 1 was a multi-storey historic brick structure featuring red brick walls with stone surrounds at windows and stone masonry carvings above doors. A single square tower turret with a balcony, lacking a roof or tiling, was centred on the north-facing aspect. The lower west-facing level included a semi-circular projection. The remainder of the building had a

slate-tiled roof combining hip, gable, and intersecting gable forms with varied ridge heights, and one dormer window on the north roof slope. The north wall had an uneven depth, with some sections projecting and others recessed.

A brick chimney on the east side of the original building was incorporated into the newer construction. The south aspect featured two semi-octagonal projections leading to a raised patio and garden, with soffit and fascia running around the building and climbing plants on the south face. An extension with a flat, felted roof and no soffit or fascia was added on the east side, connected to two smaller buildings by gated tunnels.

In Building 1, multiple gaps in soffits were recorded on the northern aspect. These included two 8cm by 2cm gap below a drainpipe at the eastern and western corner of the open gable roof (as described in Appendix E as Feature a), and a degraded soffit with a 2cm wide, 110cm long opening with peeling paint and cobwebs (Feature c). Additional gaps were noted in the same northern area, including missing mortar between bricks above windows (Feature b), which formed narrow slits potentially used for ventilation. These may only support small numbers of opportunistic bats during warmer months, though the feature depth remains undetermined.

Further along the northern elevation, lifted lead flashing and roof tiles were observed (Features d and e), particularly near the turret and ridge line. These features, while offering some cavity space for individual or low numbers of bats, are likely too exposed and thermally unstable to provide meaningful shelter. On the western aspect, a large section of missing soffit (Feature f) opens into a cavity space, likely useful for summer months only due to the exposure to the elements.

Missing and lifted tiles on the southwestern corner (Feature g) also provide access into the soffit cavity, with potential for low numbers of bats. On the southern elevation, lifted tiles (Feature h) and a 2cm by 15cm gap in the soffit below a drainpipe (Feature i) offer small cavity spaces, with possible access into the loft.

Building 2 was an old U-shaped stable block with two single-storey wings and a two-storey main building. Constructed of red brick with a slate-tiled roof, the main building featured a hip-and-valley roof form with open gable ends and a single brick chimney. Some stables remain in use, while others serve as storage. A brick wall and gate enclose the central courtyard. An attached outhouse on the east aspect has a gable slate roof and is in a dilapidated state, with many windows open or broken.

In Building 2, missing and lifted tiles (Feature a) were recorded along the roof on the southern aspect, alongside four gaps in brickwork and a 2cm by 25cm gap above a window. These features offer multiple entry points into the roof cavity. The eastern elevation (Feature b) showed a full-length section of missing and slipped tiles, particularly on the external stable, which contains wooden beams and no lining—conditions that may support bat use despite the absence of droppings or staining. Additional missing tiles were noted on the northern (Feature c) and western aspects (Feature d), with frequent openings into the roof cavity. However, the lack of loft space and internal lining may limit suitability.

Overall, while several features across the buildings provide access into cavity spaces or roof voids, most are considered to have low roost suitability due to exposure, obstruction, or

limited shelter. The buildings are both assessed as having **moderate potential** for roosting bats.

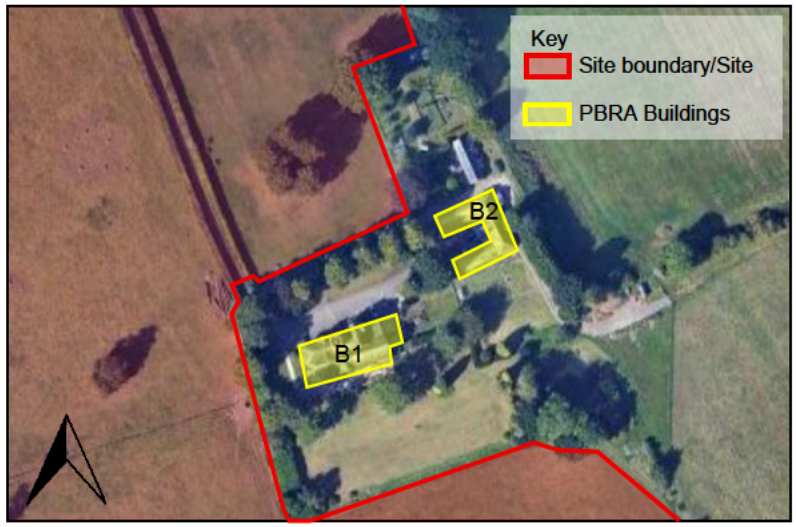


Figure 7: Buildings subject to Preliminary Bat Roosting Assessment on Site

4.4.3 Badgers

4.4.3.1 Desk study

Two records of deceased Eurasian badger *(Meles meles)* were returned in the data search, located along Ashlawn road, 200m and 630m north west of Site.

4.4.3.2 Site suitability

During the site survey, a badger sett was identified on the eastern boundary in the north eastern field. There were four sett entrances at the time of the visit with signs of activity present including badger hairs present at the entrances, fresh snuffle holes and tracks in the immediate vicinity.

A second potential sett was found along the western boundary in the northwestern field; this sett had five entrances and one outlier entrance but appeared to have been filled in. A licenced cull was undertaken on Site approximately two years ago and it is thought likely that the sett was filled in, under licence during this time.

4.4.3.3 Badger walkover survey

A badger walkover survey was conducted to determine whether badgers were present on Site or in suitable habitat within 30m of its boundaries. Field surveys are outlined in Table 7 and Figure 8 below.

The setts were classified according to their designated sett type, with further detail provided in Table 8.



Figure 8: Badger walkover survey results (Included as Appendix H)

Table 7: Badger walkover survey results

Feature	Location	Activeness	Notes
Main Sett	//foal.score.traded to //visits.grants.piano	In-use	Approximately 18 tunnel entrances between w3w//foal.score.traded and ///visits.grants.piano. Most appear disused other than those at the w3w. Signs of bedding and frequent fresh and historic latrines are present in the vicinity. Hairs found around entrances at w3w//foal.score.traded.
Outlier Sett	///danger.hurt.turkey	Disused	Two tunnel entrances, both long disused. Presence of cobwebbing across entrance and overgrown surrounding vegetation.
Subsidiary Sett	///cuts.ants.maybe	Disused	Five tunnel entrances, 4 long disused, one collapsed. Tunnels D-shaped however; detritus, cobwebbing and leaf litter build up present. No signs of recent acivity.
Outlier Sett	///card.gloves.proper	Disused	Single tunnel entrance, thought long disused due to build up of leaf litter and surrounding overgrown vegetation. No mammal path worn into ground, no signs of presence in immediately vicinity eg. Hairs, latrine, snuffle holes.
Latrine	///clues.tribune.stuck	N/A	Fresh Latrine at base of Japanese knotweed stand.

Table 8: Types of badger sett

Sett Type	Description
Main Setts	The primary breeding sett, occupied continuously by the resident badger group.
Annex Setts	Located close to the main sett; used less frequently but still important to the group.
Subsidiary Setts	Smaller setts near the main sett, used occasionally.
Outlier Setts	Additional setts located further from the main sett and used infrequently.

4.4.4 Birds

4.4.4.1 Desk study

The data search returned many bird records within the study area, including sparrowhawk (*Accipiter nisus*), redwing (*Turdus iliacus*), fieldfare (*Turdus pilaris*), and skylark (*Alauda arvensis*).

4.4.4.2 Site suitability

The hedgerows, line of trees and woodland are considered suitable for nesting birds including woodland specialist species. As such, it is considered likely that the Site is utilised by nesting birds during the bird nesting season (February – August, inclusive).

4.4.5 Hazel dormouse

4.4.5.1 Desk study

No records of hazel dormouse *(Muscardinus avellanarius)* were returned in the data search. There are some hazel

dormouse populations in Warwickshire although none recorded within commutable distance of the Site.

4.4.4.2 Site suitability

Hazel dormouse primarily occupies deciduous woodland and scrub, and feed on berries and young leaf buds. Although suitable species are present within the woodland strips on Site, the wider connectivity of these habitats to other suitable habitats in the locality is limited, therefore, it is unlikely that any hazel dormouse populations are present.

4.4.6 *Invertebrates*

4.4.6.1 Desk study

Over 1000 records of a total number of notable invertebrates were returned in the data search, with the majority being species of moths and butterflies. The closest records to Site were 400m north east of the Site and included 15 moth species, the most recent of these was recorded in August of 2020 for a Dark Crimson underwing *(Catocala sponsa)*.

4.4.6.2 Site suitability

The Dark Crimson underwing butterfly relies on ancient and mature oak woodland, none of which is present on Site. Although some oak is present on Site, it is not thought present in large enough quantities to attract substantial populations of Dark Crimson underwing.

The habitats on Site are considered suitable for a number of common and widespread invertebrate species, but due to the grazed nature of the largest habitats on Site, they are considered unlikely to support an important assemblage.

4.4.7 *Hedgehog*

4.4.7.1 Desk study

Over 320 records of hedgehog *(Erinaceus europaeus)* were returned in the data search. Almost all were from the past ten years but the most recent of these was recorded in 2021 approximately 750m north east of Site.

4.4.7.2 Site suitability

Although grazed, it is possible that hedgehogs utilise the grassland on Site for foraging and the woodland strips and treeline for sheltering and hibernating. As such, hedgehogs cannot be discounted from Site.

4.4.8 *Reptiles*

4.4.8.1 Desk study

Five records of any grass snake *(Natrix helvetica)* were returned in the data search. The closest of these was from 2016, recorded 800m east of Site. The most recent was of two grass snakes located 950m north east of Site in 2021.

4.4.8.2 Site suitability

The habitats on Site provide limited suitability for reptiles in the treelines and woodland strips. In addition, water sources are within the locality, further increasing the likelihood of reptiles, particularly grass snake. However, the grassland on Site is heavily grazed and this, as well as the lack of scrub parcels, reduces the cover available for reptiles and thus the suitability of the habitat. As such, it is only considered that reptiles may utilise the Site infrequently for commuting purposes.

4.4.9 Water voles

4.4.9.1 Desk study

No records of any water vole *(Arvicola amphibius)* were returned in the data search.

4.4.9.2 Site suitability

There are no suitable habitats for water vole on or adjacent to Site, as such, water vole is considered likely absent from Site.

4.4.10 Otter

4.4.10.1 Desk study

No records of otter *(Lutra lutra)* were returned in the data search.

4.4.10.2 Site suitability

As well as this, there are no suitable habitats for otter on or adjacent to Site, as such, otter is considered likely absent from Site.

5 Impact Assessment & Mitigation Measures

5.1 DESIGNATED SITES

The mitigation hierarchy will be followed to include in order: avoidance of impacts, mitigation of impacts and compensation for loss/impacts. Where avoidance and mitigation cannot be achieved, compensation will be required and biodiversity net gain will be utilised to ensure that all losses are adequately compensated and a gain in biodiversity is achieved through the development on Site.

5.1.1 Statutory Sites

Due to the relatively small size of the development and the distance between the Site and the closest LNR (700m), no impacts are anticipated to nationally statutory designated sites.

5.1.2 Non-Statutory Sites

The Site is located approximately 500 metres from the nearest non-statutory designated site, which is valued for its hedgerows and grassland verges. Given this distance, no direct or indirect impacts on the designated site are anticipated

5.2 HABITATS

The mitigation hierarchy will be followed to include in order: avoidance of impacts, mitigation of impacts and compensation for loss/impacts. Where avoidance and mitigation cannot be achieved, compensation will be required.

5.2.1 Modified grassland with scattered trees

A large proportion of the modified grassland on Site will be permanently destroyed to facilitate the development. Modified grassland is not considered ecologically significant and does not qualify as an HPI. However, the loss of the grassland will require compensation through Biodiversity Net Gain.

No live trees will be removed to facilitate the development. The loss of tree stumps on Site is not considered ecologically significant.

5.2.2 Other broadleaved woodland

The woodland areas on site will be retained throughout the development; however, one tree will be removed to facilitate the widening of a future access road. Temporary impacts to the woodland may also occur during the construction phase, these are considered ecologically significant at a regional level. No other parts of the woodland will be affected by this activity, and the impact is considered ecologically significant at a local level.

5.2.3 Native hedgerow

The native hedgerow along the main road will be retained throughout the development. Small areas of the two hedgerows leading to the main house will be permanently removed to facilitate access roads through the residential development. This small loss is considered ecologically

significant at a local level and will require compensation through BNG.

The remaining retained hedgerows leading to the main house may be temporarily disturbed and damaged throughout the construction phase of the development. This would be considered ecologically significant at a local level.

5.2.4 *Line of trees*

The lines of trees on Site will be retained throughout the development. Temporary or permanent damage may occur throughout the works.

5.2.5 *Urban habitats*

The urban habitats may be impacted by the proposed development however; this is not considered ecologically significant and will not be considered further within the report.

5.2.6 *Invasive Non-Native Species (INNS)*

A management plan for the Japanese knotweed present on Site has been produced (Maydencroft Ltd., 2025) and should be read in conjunction with this report.

5.3 SPECIES

5.3.1 *Amphibians*

5.3.1.1 *Predicted impacts*

Due to lack of positive eDNA results on surveyed ponds, Great Crested Newt are thought to be likely absent on Site. Therefore, no impacts are anticipated.

5.3.2 *Bats*

5.3.2.1 *Predicted impacts*

Roosting

As no trees or buildings are scheduled for removal, killing/injury of bats and/or damage/destruction to bat roosts is unlikely. Indirect impacts from noise, vibration or artificial light spillage however, have the potential to cause disturbance to potentially roosting bats in trees.

Initially, disturbance to potentially roosting bats within the buildings was a concern; however, the plans indicate that the buildings are situated over 20m from the proposed works. Given this sufficient separation, noise and vibrational disturbance to roosting bats is considered unlikely. However, there is potential for indirect impacts from artificial lighting during the works if mitigation measures are not put in place. This potential for disturbance is considered significant at a local level.

Foraging/commuting

To facilitate the works, loss of suitable foraging/commuting habitat will occur. As such, compensation measures will be needed. Furthermore, there is potential for indirect impacts from artificial lighting during the works if mitigation measures are not put in place. The loss of habitat and potential for disturbance is considered significant at a local level.

5.3.2.2 *Further surveys*

If plans should change at any point to include the removal of trees, aerial inspections should be carried out on those containing PRFs. Otherwise, no further surveys are required.

5.3.2.3 *Mitigation measures*

The following lighting mitigation should also be followed. The mitigation is outlined within the Bat Conservation Trust and Institution of Lighting Professional Guidance note:

- All works should be undertaken during normal working daylight hours. Any artificial lighting (if absolutely required) should not illuminate the boundary habitats, including the buildings of Ashlawn House to the east of the boundary;
- Where security lighting is required, it is recommended that these are motion activated with hooded luminaires and directed away from the boundaries, particularly the southern or eastern boundary;
- No lighting should fall or be directed on to the boundary vegetation;
- Any new temporary or permanent lighting should be designed to avoid light-spill onto the Site boundaries and boundary vegetation. If permanent lighting is to be installed it must follow the principles of mitigation as outlined within the Bat Conservation Trust and Institution of Lighting Professionals Guidance Note.

Mitigation measures for external street lighting will include:

- Only luminaires with an upward light ratio of 0% should be used;
- All external luminaires used on site should lack UV elements and be warm white coloured (ideally < 2700 Kelvin) to reduce blue-light components;
- LED luminaries should be used due to their sharp cut-off, lower intensity, good colour retention and dimming capability;
- Where security lighting is installed, this should be motion-activated;
- Lights should not be directed at boundary vegetation. Where required, lights can be fitted with hoods, baffles or louvres to reduce back-spill.

A lighting design strategy for bats should be created prior to works commencing to ensure that external lighting follows the above recommendations and does not produce excessive light spill.

5.3.3 *Badgers*

5.3.3.1 *Predicted impacts*

A single active sett was found on Site during the walkover, although located on the Site boundary and over 30m away from the nearest proposed building erection, there is still a chance for heavy machinery to be used within disturbance distance of the sett potentially causing damage/destruction of a badger sett and/or killing/injury to badgers, resulting in a contravention of the law.

5.3.3.2 *Further surveys*

A walkover survey must be undertaken by an Ecologist within 3 months of works commencing to ensure that no new badgers setts have been created or the current setts have been extended.

5.3.3.3 *Mitigation measures*

A fenced 30m buffer should be retained around the badger sett throughout the works to ensure no heavy machinery is

used within proximity to the sett and possibly collapse tunnels.

Any excavations on Site must be covered overnight or a means of escape provided for any badger which may become trapped within the excavation. The excavations, if left open, will need to be inspected daily prior to works commencing.

If any equipment or materials are to be stored on site overnight, all possible entrances of said equipment must be blocked and checked for wildlife the following morning prior to work commencing. Please note this only refers to the storage of materials not animal tunnel entrances. If present, the Ecologist should be contacted for advice.

Mitigation measures will be further detailed within the CEMP.

5.3.4 *Birds*

5.3.4.1 *Predicted impacts*

Destruction of, or damage to, active birds' nests throughout the development, resulting in a contravention of the law.

5.3.4.2 *Mitigation measures*

Vegetation clearance should be undertaken outside bird nesting season i.e. during the period September to February (inclusive – as a guide). If this is not possible, all areas impacted should first be checked for active nests by an ecologist or other suitably qualified individual. In the event that nesting activity is identified, certain aspects of the work in the vicinity of the nest will need to cease until the birds have finished nesting and the young have fledged.

5.3.5 *Hazel dormouse*

5.3.5.1 *Predicted impacts*

Due to lack of appropriate habitat on Site and lack of records within the local area, hazel dormice are considered likely absent, and therefore no impacts anticipated.

5.3.6 *Hedgehog*

5.3.6.1 *Predicted impacts*

Due to suitable habitats on Site and records showing that they are present in the local area, there is a potential for killing/injury of hedgehog during the works. This impact is considered ecologically significant at a local level.

5.3.6.2 *Mitigation measures*

Any excavations on Site must be covered overnight or a means of escape provided for any hedgehogs which may become trapped within the excavation. The excavations, if left open, will need to be inspected daily prior to works commencing.

If any equipment or materials are to be stored on site overnight, all possible entrances of said equipment must be blocked and checked for wildlife the following morning prior to work commencing. Please note this only refers to the storage of materials not animal tunnel entrances. If present, the Ecologist should be contacted for advice.

5.3.7 *Invertebrates*

5.3.7.1 *Predicted impacts*

The habitats on Site are not considered suitable to support an important assemblage of invertebrates. As such, the impacts are not considered ecologically significant and will not be considered further.

5.3.8 *Reptiles*

5.3.8.1 *Predicted impacts*

Due to removal of suitable reptile habitat, there is the potential for killing/injury to reptiles during the works resulting in a contravention of the law.

5.3.8.2 *Mitigation measures*

Due to the small size of the suitable reptile habitat on Site, a presence/absence survey is not required. Instead, it is considered suitable that a Working Method Statement is followed to ensure the safety of reptiles during the proposed development.

The Working Method Statement should include for:

- Where possible the works should be undertaken in the summer months to ensure reptiles are active and able to move away from heavy machinery;
- All vegetation and scrub that is scheduled for removal or disturbance should be cut utilising a two-phase approach with the presence of an Ecological Clerk of Works (ECoW);
- If work during the reptile hibernation period cannot be avoided (mid-October until March, as a guide), the ECoW must remove any hibernacula by hand. If hibernating reptiles are encountered, works must cease.

5.3.9 *Otter*

5.3.9.1 *Predicted impacts*

Due to lack of appropriate habitat on Site and lack of records within the local area, otters are considered likely absent, and therefore no impacts anticipated.

5.3.10 *Water vole*

5.3.10.1 *Predicted impacts*

Due to lack of appropriate habitat on Site and lack of records within the local area, water voles are considered likely absent, and therefore no impacts anticipated.

5.4 RESIDUAL EFFECTS

The measures detailed above avoid and/or mitigate the impacts to protected species on Site. Sensitive management of the proposed site layout has ensured that important habitat features have been retained. As such, residual effects are not considered likely to occur. In addition, when BNG has been calculated and the loss of habitats will be mitigated by proposed measures.

5.5 ENHANCEMENTS

Enhancements to the Site post-works should be fully listed within a Biodiversity Net Gain Assessment to compensate for the loss of habitats created by the works.

5.5.1 *National Planning Policy Framework*

The National Planning Policy Framework (NPPF) requires local planning authorities to request the preservation, restoration, and recreation of priority habitats and ecological networks and the recovery of priority species populations. In

addition, the works should result in no net loss of biodiversity.

5.5.2 *Recommendations*

The following list is the recommended ecological enhancement opportunities for the Site. They are not required for mitigation but would allow a greater increase in biodiversity at the Site in line with the NPPF requirements:

- Provision of bird boxes and bat boxes within trees;
- Provision of reptile hibernacula along woodland boundaries;
- Installation of Swift bricks in the new constructions;
- Removal of Japanese knotweed;
- Planting of trees to account for loss of single tree.

5.6 COMPENSATION

The proposed development on the main site will result in the loss of habitats. As such, a calculation of net gain against the loss of habitat using Natural England's Statutory Biodiversity Metric was conducted by a suitably qualified Ecologist to ensure all loss is compensated for and a 10% gain in biodiversity is achieved.

This included undertaking a baseline survey, competing the habitat condition assessment sheets, and inputting all data into the metric.

Biodiversity net gain is distinguished from other forms of ecological compensation by the requirement for measurable outcomes. Losses from development and gains from an 'offset' are calculated using a single biodiversity metric, which quantifies habitats against fixed units of biodiversity.

Biodiversity offsets can be both on-site and off-site, and can involve creation, enhancement or accelerated succession of habitats. The amount of biodiversity units an offset is worth must exceed the amount of biodiversity units that will be lost as a result of development.

Species specific compensation to account for the loss of habitats are listed as follows:

- Creation of hibernacula along treeline habitats on Site boundary to provide areas of shelter for reptiles;
- Installation of x3 Shwegler 2F Bat Boxes;
- Installation of x3 Shwegler 1B Hole Nest Boxes;
- Installation of x2 'Hedgehog Timeless Haus' along treeline habitats on Site boundary.

5.7 MONITORING

The BNG enhancement and creation proposals will require a Habitat Management and Monitoring Plan (HMMP) to ensure the habitats on Site are retained for 30 years post development. No further post-construction ecological monitoring is required.

6 Conclusions

The proposed works on Site are not considered likely to impact any internationally, nationally or locally designated sites. The habitats on Site include; modified grassland with scattered trees, woodland, hedgerow, line of trees and urban habitats and are considered likely to support; GCN, badgers, nesting birds, hedgehogs, reptiles and roosting, foraging and commuting bats.

As such, a PBRA was conducted on the buildings adjacent to Site, a GLTA was conducted of trees on and surrounding the Site and eDNA surveys were conducted of ponds within 250m of the Site. The GLTA identified a number of trees with potential roosting features; the results of the eDNA surveys concluded negative results in all ponds; and the PBRA results confirmed the two buildings to have **moderate potential** for bat roosts.

A Japanese Knotweed survey and a badger walkover survey were also carried out confirming an area of Japanese knotweed recommended for removal and a badger sett showing high signs of activity. A management plan for the Japanese knotweed has been produced and should be read in conjunction with this report.

As habitat is to be permanently lost, a Biodiversity Net Gain assessment has been produced to ensure a net gain in biodiversity from the scheme. This should be read in conjunction with this report.

A number of mitigation measures will be necessary either prior to construction commencing or related to the timing of works, as detailed in Table 8.

Table 9: Summary of further surveys and mitigation measures on Site

Bats	*Further surveys* If plans should change at any point to include the removal of trees, aerial inspections should be carried out on those containing PRFs. Otherwise, no further surveys are required. *Mitigation measures* The following lighting mitigation should also be followed. The mitigation is outlined within the Bat Conservation Trust and Institution of Lighting Professional Guidance note: • All works should be undertaken during normal working daylight hours. Any artificial lighting (if absolutely required) should not illuminate the boundary habitats, including the buildings of Ashlawn House to the east of the boundary; • Where security lighting is required, it is recommended that these are motion activated with hooded luminaires and directed away from the boundaries, particularly the southern or eastern boundary; • No lighting should fall or be directed on to the boundary vegetation; • Any new temporary or permanent lighting should be designed to avoid light-spill onto the Site boundaries and boundary vegetation. If permanent lighting is to be installed it must follow the principles of mitigation as outlined within the Bat Conservation Trust and Institution of Lighting Professionals Guidance Note. Mitigation • measures for external street lighting will include: • Only luminaires with an upward light ratio of 0% should be used; • All external luminaires used on site should lack UV elements and be warm white coloured (ideally < 2700 Kelvin) to reduce blue-light components; • LED luminaries should be used due to their sharp cut-off, lower intensity, good colour retention and dimming capability;

	• Where security lighting is installed, this should be motion-activated; • Lights should not be directed at boundary vegetation. Where required, lights can be fitted with hoods, baffles or louvres to reduce back-spill. A lighting design strategy for bats should be created prior to works commencing to ensure that external lighting follows the above recommendations and does not produce excessive light spill.
Badger	*Further surveys* A walkover survey must be undertaken by an Ecologist within 3 months of works commencing to ensure that no new badgers setts have been created or the current setts have been extended. *Mitigation measures* A fenced 30m buffer should be retained around the badger sett throughout the works to ensure no heavy machinery is used within proximity to the sett and possibly collapse tunnels. Any excavations on Site must be covered overnight or a means of escape provided for any badger which may become trapped within the excavation. The excavations, if left open, will need to be inspected daily prior to works commencing. If any equipment or materials are to be stored on site overnight, all possible entrances of said equipment must be blocked and checked for wildlife the following morning prior to work commencing. Please note this only refers to the storage of materials not animal tunnel entrances. If present, the Ecologist should be contacted for advice.
Birds	*Mitigation measures* Vegetation clearance should be undertaken outside bird nesting season i.e. during the period September to February (inclusive – as a guide). If this is not possible, all areas impacted should first be checked for active nests by an ecologist or other suitably qualified individual. In the event that nesting activity is identified, certain aspects of the work in the vicinity of the nest will need to cease until the birds have finished nesting and the young have fledged.
Hedgehog	*Mitigation measures*
	Any excavations on Site must be covered overnight or a means of escape provided for any hedgehogs which may become trapped within the excavation. The excavations, if left open, will need to be inspected daily prior to works commencing. If any equipment or materials are to be stored on site overnight, all possible entrances of said equipment must be blocked and checked for wildlife the following morning prior to work commencing. Please note this only refers to the storage of materials not animal tunnel entrances. If present, the Ecologist should be contacted for advice.
Reptiles	*Mitigation measures* Due to the small size of the suitable reptile habitat on Site, a presence/absence survey is not required. Instead, it is considered suitable that a Working Method Statement is followed to ensure the safety of reptiles during the proposed development. The Working Method Statement should include for: • Where possible the works should be undertaken in the summer months to ensure reptiles are active and able to move away from heavy machinery; • All vegetation and scrub that is scheduled for removal or disturbance should be cut utilising a two-phase approach with the presence of an Ecological Clerk of Works (ECoW); • If work during the reptile hibernation period cannot be avoided (mid-October until March, as a guide), the ECoW must remove any hibernacula by hand. If hibernating reptiles are encountered, works must cease.

Mitigation measures to protect the habitats within the main site include;

- Follow the results of the BS5837 for retained individual trees, hedgerows, woodlands and lines of trees;
- Follow Arboricultural method statement for removal of single tree.

- Woody vegetation removal to be undertaken outside of bird nesting species If undertaken during bird nesting season, an ecologist must first conduct a nesting bird check.
- 10m buffer and acoustic hoarding around PRF trees to limit disturbance to bats.
- Installation of ramps or means of escape within any excavations for badgers and hedgehogs;
- Sensitive lighting for foraging and commuting bats;
- Sensitive timing and two phase cutting of grassland to protect reptiles.

Species specific compensation also includes:

- Creation of hibernacula along treeline habitats on Site boundary to provide areas of shelter for reptiles;
- Installation of x3 Shwegler 2F Bat Boxes;
- Installation of x3 Shwegler 1B Hole Nest Boxes;
- Installation of x2 'Hedgehog Timeless Haus' along treeline habitats on Site boundary.

No residual effects are anticipated as a result of this development if the aforementioned mitigation measures are followed. In addition, it is recommended that a Construction Environment Management Plan (CEMP) is produced once a Principial Contractor has been appointed, and a finalised work plan has been agreed. This will ensure all ecological matters are managed throughout the construction phase and may identify the need for further ecological monitoring and supervision.

A HMMP will also be required to ensure the habitat creation required to achieve a 10% increase in biodiversity units on Site is appropriately managed for 30 years post-development.

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Disclaimer

Every effort has been made to ensure that the content of this report accurately identifies the potential ecological constraints to operations, its overall ecological value, and considered the possibility of the presence or absence of all Protected Species and the need for further surveys or ecological works. External factors such as weather conditions, time of day, seasons, disturbance by others, can all affect the use of the site by such species, and this report should therefore not be viewed as definitive. No liability can be accepted for omissions or changes within the status of wildlife after the production of this report.

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26th February 2026

8 Appendices



Key

- Line of trees
- Native hedgerow
- g4 - modified grassland
- w1g - other woodland broadleaved
- u1d - suburban mosaic of developed/natural surface
- u1e - built linear features
- Trees

Client	Sworders
Project	Ashlawn House Preliminary Ecological Appraisal
Title	Habitat Map
Drawn: HY	Checked: AS
Date	17.10.25
Drawing No.	Appendix A
Revision	Issue

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Original Size	A3
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APPENDIX B. SURVEY PICTURES



Plate 1: Modified grassland with scattered trees on Site



Plate 2: Hedgerow on Site



Plate 3: Modified grassland with tree stumps on Site



Plate 4: Hedgerows present on Site



Plate 5: Japanese knotweed on Site



Plate 6: Woodland on Site





Plates 7&8: The Japanese knotweed stand (left) and mature stems exhibiting bonsai growth from leaf nodes (right)







Plates 9,10,&11: Three active badger tunnel entrances identified in the badger walkover survey. Spanning from ///foal.score.traded to ///visits.grants.piano.



Plate 12: Building 1 during PBRA survey



Plate 13: Building 2 during PBRA survey

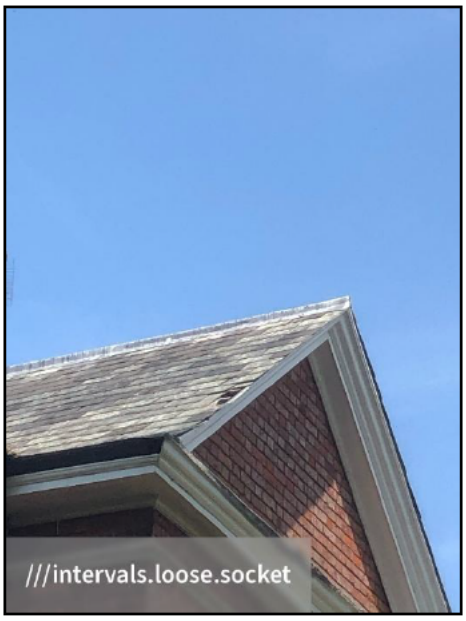


Plate 14: Feature g on Building 1 - missing tiles on south western corner of roof, opens into soffit cavity space



Plate 15: Feature i on Building 1, gap in the soffit



Plate 16: Feature a on Building 2 - missing and lifted tiles on south aspect roof, 4 gaps in brickwork on same aspect. and gap above window

APPENDIX C. RELEVANT PROTECTED SPECIES LEGISLATION

Summary

Species	Protection	Details
Bats (All)	Conservation of Habitats and Species Regulations 2017 – Sch 2	Works likely to impact on the species or its habitat requires a European Protected Species Licence issued by Natural England
	Wildlife and Countryside Act – Sch 5 Section 9 (full protection)	Prohibits killing, injuring or taking by any method; Prohibits sale or advertising for sale; Prohibits damage, destruction or obstruction of access to any structure or place which is used for shelter or protection; Prohibits disturbance whilst occupying a structure used for shelter or protection
	Wildlife and Countryside Act – Sch 6	Prohibits killing or taking by certain methods under Section 11 (1)
Great-crested Newt	Conservation of Habitats and Species Regulations 2017 – Sch 2	Works likely to impact on the species or its habitat requires a European Protected Species Licence issued by Natural England
	Wildlife and Countryside Act – Sch 5 Section 9 (full protection)	Prohibits killing, injuring or taking by any method; Prohibits sale or advertising for sale; Prohibits damage, destruction or obstruction of access to any structure or place which is used for shelter or protection; Prohibits disturbance whilst occupying a structure used for shelter or protection
	Wildlife and Countryside Act – Sch 6	Prohibits killing or taking by certain methods under Section 11 (1)
Birds	Wildlife and Countryside Act – Sch 1	Prohibits the taking, damaging or destruction of active bird nests; killing, injuring or taking of any wild bird; taking or destruction of the eggs of any wild bird
	Wildlife and Countryside Act – Sch 1 (pt.1)	Prohibits any form of intentional or reckless disturbance to bird species as listed under Schedule 1 part 1 whilst they are nesting or rearing young
Badger	Protection of Badgers Act 1992	Prohibits killing, injuring or taking a badger or cruelly ill-treating a badger
	Wildlife and Countryside Act – Sch 6	Prohibits killing or taking by certain methods under Section 11 (1)
Reptiles (Common species)	Wildlife and Countryside Act – Sch 5 Section 9 (pts. 1 & 5 only)	Prohibits killing, injuring, taking by any method; Prohibits sale or advertising for sale

European Protected Species

The Bern Convention (The Convention on the Conservation of European Wildlife and Natural Habitats) was adopted in 1979 and came into force in 1982. To implement this agreement, the European Community adopted the EC Habitats Directive.

The EC habitats directive has been transposed into UK legislation by the Wildlife and Countryside Act, 1981 (as amended) and the Conservation of Habitats and Species Regulations, 2017. The Countryside and Rights of Way Act (CRoW), 2000 strengthened the existing wildlife legislation in the UK.

The UK has also signed The Bonn Convention (The Convention on the Conservation of Migratory Species of Wild Animals) and is therefore party to various agreements.

Bats

All 17 species of bats are protected under Schedules 5 and 6 of the Wildlife and Countryside Act 1981 (and as amended) and are also protected under Schedule 2 of the Conservation of Habitats and Species Regulations 2017. They are listed under Appendix II of the Bern Convention (with the exception of common pipistrelle *(Pipistrellus pipistrellus)* which is listed under Appendix III) and Annex IV of the EC Habitats Directive, 1992. Certain species of bat are additionally listed under Annex II of the Habitats Directive, which means that sites of key importance to populations may be afforded statutory protection as a Special Area of Conservation (SAC). Bats and their habitats are also listed under Appendix II of The Bonn Convention and therefore the UK has an obligation to protect their habitat, including links to important feeding areas.

Great Crested Newt

Great crested newts are protected under Schedules 5 of the Wildlife and Countryside Act 1981 (and as amended) and are also protected along with their habitat under Schedule 2 of the Conservation of Habitats and Species Regulations 2017. They are listed under Appendix III of the Bern Convention and Annex II and IV of the EC Habitats Directive 1992.

Other Protected Species

Birds

All wild birds are protected under Schedule 1 of the Wildlife and Countryside Act, 1981. Therefore, in the

UK it is an offence to:

- take, damage or destroy the nest of any wild bird whilst it is being built or in use;
- kill, injure or take any wild bird; and
- take or destroy the eggs of any wild bird.

To avoid committing an offence no works should be carried out on a structure/ feature that is being used by nesting birds. Nesting is deemed to be over when the young have fully fledged.

Certain species which are listed in Schedule 1 Part 1 of the Wildlife and Countryside Act receive special protection. In these cases any form of intentional or reckless disturbance when they are nesting or rearing dependant young, constitutes an offence.

Badger

Badgers are fully protected in the UK by the Protection of Badgers Act, 1992 and by Schedule 6 of the Wildlife and Countryside Act, 1981(as amended). This makes it an offence to:

- wilfully kill, injure, take, possess or cruelly treat a badger;
- intentionally or recklessly damage, destroy or obstruct access to a badger sett; and
- disturb a badger while it is occupying a sett. Disturbance could include digging or scrub clearance within 30m of the sett, and therefore advice should be sought before carrying out such activities.

Badgers are mainly protected due to persecution in the past and are not rare.

Reptiles

All native reptiles are protected from intentional killing and injury under Schedules 5 of the Wildlife and Countryside Act 1981 (and as amended). They are listed under Appendix III of the Bern Convention as species which are in need of protection.

Sand lizard and smooth snake, along with their habitats, are further protected under Schedule 2 of the Conservation of Habitats and Species Regulations 2017.

Species of Principal Importance

Species of principal importance for the purpose of conserving biodiversity, covered under Section 41 (England) of the NERC Act (2006). Species of principal importance must be treated as a material consideration by a public body when performing any of its functions with a view to maintaining the favourable conservation status. Those such species which are considered to have potential to be encountered on Site and are not aforementioned as a result of a higher level of protection in the sections above are listed below:

- *West European Hedgehog (Erinaceus europaeus).*

APPENDIX D: GROUND LEVEL TREE ASSESSMENT RESULTS

Tree Number	Feature	Description	Suitability
T25 – Lime	A – rot hole in pruning wound on branch.	Rot hole in pruning wound on branch, northeast facing, 9m height. Most easterly tree in group. Rot hole in one of the lowest branches with new branches shooting from around 3cm diameter.	PRF-I
T28 – Horse chestnut	A – rot hole in pruning wound on branch.	West facing, 8m height, hole on bottom of branch about 4m from stem and extends through a fine hole up the stem.	PRF-I
	B - rot hole in pruning wound on branch.	West facing, 8m, hole on underside of branch 1m from stem.	PRF-I
	C - rot hole in pruning wound on branch.	West facing, 7m height, appears to extend downwards. Further survey required to determine.	FAR – climbing or ladder inspection required.
T84 – Oak	A – rot hole in pruning wound on branch.	North facing, 8m height, hole on underside of branch.	PRF-I
T85 – oak	A – woodpecker hole on underside of branch	Southwest facing, 20m height, 3m diameter hole in underside of branch extending over road.	PRF-M – three aerial inspections required to determine presence/likely absence of roosting bats. Due to access issues, emergence surveys may be easier.
	B – fissure	Fissure in main stem leading to potential hollowing of a large stem, southeast facing, 15m, 3m by 10cm wood fissure leading to hollowed branch. Close to powerline.	PRF-M - three aerial inspections required to determine presence/likely absence of roosting bats. Due to proximity to powerlines, emergence surveys may be easier.
T86 - Ash	A – woodpecker holes	North facing, 12m height, a series of woodpecker holes leading to interior of hollowed main stem.	PRF-M - three aerial inspections required to determine presence/likely absence of roosting bats.
	B – woodpecker hole	Southeast facing, 12m height, single woodpecker hole leading to hallowed underside of side branch.	PRF-M - three aerial inspections required to determine presence/likely absence of roosting bats.
T87 – Ash	A – fissure in main stem	Southeast facing, 3m height, 25cm x 5cm in the main stem appears to extend downwards into cavity.	FAR - climbing or ladder inspection required.
	B – woodpecker hole	East facing, 4m height, woodpecker hole into exposed heartwood and hollowing in stem. 1m above feature a.	FAR - climbing or ladder inspection required.
T78 - Ash	A – rot hole in pruning wound	Northwest facing, 10m, 3cm diameter in western stem.	PRF-I

Tree Number	Feature	Description	Suitability
	B – 2 x woodpecker holes	In eastern stem, north facing at 12m height, 2cm diameter woodpecker holes.	PRF-I
	C – woodpecker hole	Further up the eastern stem, north facing, 15m height, 6cm diameter woodpecker hole likely to lead to extensive hollowing in stem,	PRF-M - three aerial inspections required to determine presence/likely absence of roosting bats.
T31 – Horse chestnut	A – rot hole on main stem	Northwest facing, 2m height, 4cm diameter hole leading to cavity.	PRF-M - three aerial inspections required to determine presence/likely absence of roosting bats.
	B – fissure on branch	East facing, 10m height, 20cm x 5cm fissure on side of most southern stem.	PRF-M - three aerial inspections required to determine presence/likely absence of roosting bats.
T89 – horse chestnut	A – tear out wound	Southeast facing, 13m height, tree midway between field and road. Wound may expose cavity in the heartwood.	FAR - climbing or ladder inspection required.

APPENDIX E: PRELIMINARY BAT ROOST ASSESSMENT RESULTS

Building No.	Feature ID	Location	Type of feature	Height and Orientation	Feature Description
1	a	topic.region.topped and case.fills.goods	gap in soffit	9m N	Gap in soffit, approx. 8cm height, 2cm width. corner of open gable roof. below drainpipe. potential to open into cavity space. matching on the western corner also
	b	boom.dirt.scout	missing mortar	3-7m N	Missing mortar above windows on east end of northern aspect. two slits above each window, possibly used as ventilation. each 1cm wide 6cm height. suitable for small numbers of opportunistic bats in summer. undetermined depth.
	c	motion.trap.notion	gap in soffit	2m N	Rather degraded soffit, paint peeling and cobwebs present, gap approx. 2cm wide and 110cm long. depth undetermined, could access cavity space
	d	lazy.office.reap	lifted lead flashing and lifted tiles	11m N	West facing along roof ridge line on N aspect. lifted by about 3cm, depth 5cm or so judging from ground. potentially too exposed. in same corner, couple of lifted roof tiles and other small areas of lifted flashing, low potential for low numbers of bats
	e	jaws.newly.nights	lifted lead flashing and lifted tiles and gap in soffit	8m N	Deteriorated corner of roof close to turret, lifted tiles, lifted lead flashing and a gap in the soffit below a drainage pipe.
	f	gaps.care.will	large chunk of missing soffit	6m W	Large section of soffit missing, leading to cavity space. large opening therefore likely only suitable for use during summer
	g	intervals.loose.socket	missing and lifted tiles	7m W	Missing tiles on south western corner of roof, opens into soffit cavity space. other lifted tiles present also, suitable for small numbers of bats
	h	snail.rubble.modest	lifted tiles	7m S	Lifted tiles x2sections, creating small cavity space for small numbers of bats, potential access into loft?
	i	rewarding.helps.bland	gap in soffit	7m S	Gap below drainpipe in soffit, approx. 2cm high and 15cm wide. potential access into fascia void.
2	a	chains.chew.dated	missing tiles, gaps in brick,	6m S	Missing and lifted tiles on south aspect roof, approx. 6 along length. approx. 4 gaps in brickwork on same aspect. and gap above window (2cm x 25cm)

[redacted]	b	food.bump.gosh	missing tiles, gaps in brick,	6m E	Full length with missing and slipped tiles. external stable is suitable for bats with wooden beams and no lining. multiple slipped tiles offer access points into the stable. no droppings or staining found inside.
[redacted]	c	loud.transfers.strike	missing tiles	6m N	Corner of roof missing and slipped tiles.
[redacted]	d	vines.pipes.best and blows.liner.shall	missing tiles	6m W	Frequent missing tiles leading into roof cavity. no loft space in building no lining, wooden beams

APPENDIX F: eDNA POND MAP



APPENDIX G: TREES SUBJECT TO GLTA



APPENDIX H: BADGER SURVEY RESULTS



PLANNING STATEMENT (INCL. AFFORDABLE HOUSING STATEMENT)

OUTLINE PLANNING APPLICATION WITH ALL MATTERS RESERVED EXCEPT FOR ACCESS FOR THE ERECTION OF UP TO 90 RESIDENTIAL DWELLINGS (USE CLASS C3) (INCLUDING UP TO; 28 AFFORDABLE HOMES, 9 SELF-BUILD/CUSTOM BUILD HOMES, 9 ACCESSIBLE HOMES TO M4(3) STANDARDS AND 6 SPECIALIST HOMES), UP TO 2.28HA OF PUBLIC OPEN SPACE (INCLUDING NATURAL AND SEMI-NATURAL GREEN SPACE, AMENITY GREEN SPACE AND A CHILD'S PLAY AREA), A PEDESTRIAN REFUGE ISLAND CROSSING AND ASSOCIATED DEVELOPMENT

AT

LAND ON THE SOUTH SIDE OF ASHLAWN ROAD RUGBY CV22 5QF

SWORDERS
Agricultural Commercial Residential

SWORDERS
NOVEMBER 2025

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Appendices

Appendix 1: Officers Report to Local Authority Reference R23/0491
Appendix 2: The Home Builders Federation Housing Calculator
Appendix 3: National Housing Federations Local Economic Impact Calculator
Appendix 4: 87370 TPO No 396 Inwoods House Ashlawn Road Rugby

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by Sworders on behalf of Ashlawn Investments Limited (hereafter referred to as the 'Applicant') in support of an outline planning application with all matters reserved except for access for the erection of up to 90 residential dwellings (Use Class C3) (including up to; 28 affordable homes, 9 self-build/custom build homes, 9 accessible homes to M4(3) standards and 6 specialist homes), up to 2.28ha of public open space (including natural and semi-natural green space, amenity green space and a child's play area), a pedestrian refuge island crossing and associated development at Land on the South Side Of, Ashlawn Road, Rugby, CV22 5QF.

1.2 The application site is located to the South of Rugby to the Northeast of Dunchurch on the South side of Ashlawn Road which runs between the A426 roundabout and the junction with the A428/Hillmorton Road. The site comprises some 7.43ha of grazing land to the East and West of the existing access, which serves both 'The Lodge' to the North of the site and 'Ashlawn House' and 'The Bungalow' to the Southeast, and forms part of the wider curtilage to 'Ashlawn House'.

1.3 The site is bound to the North by Ashlawn Road/B4429 beyond which is Ashlawn Gardens comprising 860 residential dwellings forming part of the South West Rugby Sustainable Urban Extension and the current extent of the Rugby Urban Edge. To the West, the site is bound by the 'Site Of Former Inwoods House' wherein 25 dwellings are currently under construction. To the East of the site is a parcel of land adjacent to 'Hall Cross' beyond which is a clustering of dwellings fronting Ashlawn Road and around Gorse Farm Close. To the South, is open countryside, beyond which lies the M45.

1.4 The site is currently accessed by way of a private drive onto the public highway serving 'The Lodge', 'Ashlawn House' and 'The Bungalow'. The driveway is bound on either side by a tall hedgerow. There are a further two field accesses to the site on the West of the site adjacent to the access to the 'Site Of Former Inwoods House' and on the East of the site adjacent to 'Ashlawn Cottage'.

1.5 Rugby Borough Council's Housing Land Supply Position Statement 2025-2030 confirms that Rugby can only demonstrate a 4.16 year supply of housing (equating to a shortfall of 542 dwellings). At the time of writing, it is the Applicants position that Rugby Borough Council can only demonstrate a housing land supply of 2.85 years against their local housing need (equating to a shortfall of 1435 dwellings). As such this application must be determined in accordance Paragraph 11(d) in the National Planning Policy Framework and granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

1.6 The proposed development will deliver significant public benefits including *inter alia* 28 affordable homes, 9 self-build/custom build dwellings, 6 specialist homes (including 3 sheltered homes and 3 extra care homes), a children's play area comprising both a Local Area for Play (LAP) and a Local Equipped Area for Play (LEAP), amenity green space, natural and semi-natural green space, a new pedestrian crossing over Ashlawn Road, a 17.49% and 18.17% Biodiversity Net Gain in Habitat Units and Hedgerow Units respectively (including over 168 new trees and significant areas of enhanced grassland) and will result in Net-Zero operational carbon emissions through an innovative energy strategy utilising a communal Ground Source Heat Pump (GSHP) system alongside rooftop solar photovoltaic (PV) panels.

1.7 This application is supported with the following plans and supporting technical information:

- Topographical Survey (Dwg No. 20126-Topo)
- Site Location Plan (Dwg No. 211226 P 00 001)
- Existing Site Plan (Dwg No. 211226 P 00 002)
- Indicative Masterplan (Dwg No. 211226 P 00 100 Rev A)
- Constraints and Opportunities Plan (Dwg No. 211226-P-00-010)
- Land Use Parameter Plan (Dwg No. 211226-P-00-020)
- Green and Blue Infrastructure Parameter Plan (Dwg No. 211226-P-00-021)
- Access and Movement Parameter Plan (Dwg No. 211226-P-00-022)
- Density and Building Heights Parameter Plan (Dwg No. 211226-P-00-023)
- Design and Access Statement (Ref: TAR1262 211226 DAS November 2025)

- Rugby 5 Year Housing Supply Position Assessment for Period 2025-2030
- Health Impact Assessment
- Air Quality Assessment (Ref. 333801579 Ashlawn House, Rugby AQA P02)
- Ground Conditions Desk Study (Ref. 333801579-STN-XX-XX-RP-GE-1001-P02)
- Arboricultural Impact Assessment (Ref. GAC0030-AIA-Ashlawn House-23-09025-V1.3)
- Ecological Impact Assessment (EcIA) (Ref. MH10077 Land at Ashlawn House Ecological Impact Assessment V2 Oct 2025)
- Biodiversity Net Gain Statement
- Biodiversity Net Gain Condition Assessments
- Biodiversity Net Gain Metric Updated October 2025
- Biodiversity Net Gain Habitat Baseline Plan (Dwg No. 001 Rev 1)
- Biodiversity Net Gain Post Intervention Plan (Dwg No. 002 Rev 1)
- Japanese Knotweed Management Plan (Ref. MH10336 V2)
- Landscape and Visual Impact Assessment (Ref. 20112025)
- Energy and Sustainability Assessment (Incl. (Ref. 6142/ESS Rev C)
- Heritage Desk-Based Assessment (Ref. 2549)
- Flood Risk Assessment (Ref. 333801579-STN-XX-XX-RP-WENV-0001)
- Outline Drainage Strategy (Ref. 333801579-HYD-XXX-XX-RP-C-0001 P03)
- Transport Assessment (Ref. 1007.0022TA8)
- Travel Plan (Ref. 1007.0022TP2)
- Proposed Refuge Island Crossing Upgrade Arrangements (Dwg No. 1007.0022-0001-P04)
- Proposed Development Access Arrangements (Dwg No. 1007.0022-0002-P05)
- Proposed development Internal Assessment (Dwg No. 1007.0022-0003-P05)

- Statement of Community Involvement
- Planning Statement (Incl. Affordable Housing Statement)
- Sustainability Checklist
- CIL Forms 1, 7 and 10
- Asset Search and Record Pack (Ref: 333801579-STN-XX-XX-RP-Y-3000-P01)

2.0 PLANNING BACKGROUND

2.1 There is no planning history available for the site subject to this application, other relevant planning history for the site locality is however summarised below:

LPA Ref	Location	Proposal	Decision and Date
R13/2102	LAND NORTH OF ASHLAWN ROAD, ASHLAWN ROAD, RUGBY, CV22 5SL	Outline application for the demolition of existing buildings, erection of up to 860 dwellings, land for a potential primary school, two vehicular accesses from Ashlawn Road and the provision of a bus link control feature to Norton Leys, open space, green infrastructure, landscaping and associated infrastructure, including sustainable urban drainage features. All matters to be reserved except access points into the site.	Allowed at Appeal - 10 Jul 2017
R16/2333	CIA INSURANCE SERVICES LTD, INWOODS HOUSE, ASHLAWN ROAD, RUGBY, CV22 5QF	Demolition of existing buildings and development of retirement village consisting of 11 bungalows (Use Class C2), 40 apartments (Use Class C2) and a 60-bed care home (Use Class C2), highways and drainage infrastructure and landscaping (access unreserved)	Approved - 27 Feb 2018

R19/0854	LAND NORTH OF ASHLAWN ROAD, ASHLAWN ROAD, RUGBY, RUGBY, CV22 5SL	Spine road, secondary access roads, cycle/footway to Norton Leys, sustainable urban drainage works and strategic landscaping. Approval of reserved matters (access, appearance, landscaping, layout and scale) relating to R13/2102 (Demolition of existing buildings, erection of up to 860no. dwellings, land for potential primary school, two vehicular accesses from Ashlawn Road and the provision of a bus link control feature to Norton Leys, open space, green infrastructure, including SUDs works.)	Approved - 04 Dec 2019

R19/0941	LAND NORTH OF ASHLAWN ROAD, ASHLAWN ROAD, RUGBY, CV22 5SL South Eastern part of site	Erection of 105 dwellings, associated access, infrastructure and landscaping. Approval of reserved matters (access, appearance, landscaping, layout and scale) relating to R13/2102 (Demolition of existing buildings, erection of up to 860no. dwellings, land for potential primary school, two vehicular accesses from Ashlawn Road and the provision of a bus link control feature to Norton Leys, open space, green infrastructure, including SUDs works.)	Approved - 09 Jan 2020

R19/1185	LAND NORTH OF ASHLAWN ROAD, ASHLAWN ROAD, RUGBY, CV22 5SL	Erection of 333 dwellings, associated access, infrastructure and landscaping. Approval of reserved matters (access, appearance, landscaping, layout and scale) relating to R13/2102 (Demolition of existing buildings, erection of up to 860no. dwellings, land for potential primary school, two vehicular accesses from Ashlawn Road and the provision of a bus link control feature to Norton Leys, open space, green infrastructure, including SUDs works.)	Approved - 17 Sep 2020
R20/0124	LAND NORTH OF ASHLAWN ROAD, ASHLAWN ROAD, RUGBY, CV22 5SL North eastern part of site	Erection of 206 dwellings, associated access, infrastructure and landscaping. Approval of reserved matters (access, appearance, landscaping, layout and scale) relating to R13/2102.	Approved - 21 Dec 2021

R20/0213	INWOODS HOUSE, ASHLAWN ROAD, RUGBY, RUGBY, CV22 5QF	Demolition of existing buildings and development of retirement village consisting of 11 bungalows (Use Class C2), 40 apartments (Use Class C2) and a 59-bed care home (Use Class C2), approval of reserved matters relating to R16/2333.	Approved - 12 Nov 2020
R21/0689	LAND NORTH OF ASHLAWN ROAD, ASHLAWN ROAD, RUGBY, CV22 5SL	Erection of 216 dwellings, associated access, infrastructure and landscaping. Approval of reserved matters (access, appearance, landscaping, layout and scale) relating to R13/2102.	Approved - 23 Mar 2022
R21/0904	LAND NORTH OF ASHLAWN ROAD, ASHLAWN ROAD, RUGBY, CV22 5SL	Retention of landscaping bunds as constructed and removal of part of bund and reduction in height of bund to the rear of Brafield Leys. Approval of reserved matters (landscaping) relating to R13/2102	Refused - 10 Feb 2022
R22/1328	LAND NORTH OF ASHLAWN ROAD, ASHLAWN ROAD, RUGBY, CV22 5SL	Western Neighbourhood Equipped Area for Play. Approval of reserved matters (appearance, landscaping, layout and scale) relating to R13/2102.	Approved - 30 Oct 2024
R23/0491	Site Of Former Inwoods House, Ashlawn Road, Dunchurch	Proposed construction of 25 no. residential dwellings	Approved - 20 Mar 2024

R23/0573	LAND NORTH OF ASHLAWN ROAD, ASHLAWN ROAD, RUGBY, CV22 5SL	Provision of sports pitches with car park. Approval of reserved matters (access, appearance, landscaping, layout and scale) relating to R13/2102. (Revised scheme from that approved by R19/0854.)	Approved - 21 Feb 2024

3.0 PROPOSED DEVELOPMENT

3.1 As detailed above, the proposed development comprises the erection of up to 90 residential dwellings (Use Class C3) including up to; 28 affordable homes, 9 self-build/custom build homes, 9 accessible homes to M4(3) standards and 6 specialist homes. Full details of the indicative housing and tenure mix is set out at Section 8.0.

3.2 Whilst layout is a reserved matter, the Indicative Masterplan has been landscape-led with an emphasis on tree retention, new tree planting and enhancement of grasslands such that the proposed development retains the sites existing estate parkland character. Full details regarding the design of the indicative layout are set out within the Design and Access Statement submitted alongside this application.

3.3 The proposed development retains the existing access which will continue to serve Ashlawn House, Ashlawn Lodge and The Bungalow alongside the creation of a new primary access (in place of an existing field access) to the East of the site frontage onto the public highway (Ashlawn Road). The primary access leads onto a spine road that runs through the development, off which are several secondary and tertiary roads. The proposed development will also make provision of a dedicated pedestrian access (in place of an existing field access) to the West of the site frontage which links to the existing pedestrian infrastructure along the public highway (Ashlawn Road) and a new pedestrian refuge island crossing over the public highway (Ashlawn Road). The site is also served by dedicated pedestrian and cycle links that extend through the site providing permeability for pedestrians alongside several amenity pathways within the on-site open space provision. Full details of the access provisions are set out at Section 12.0.

3.4 The proposed development would comprise approximately 2.28ha of public open space. This includes 0.49ha of natural and semi-natural green space to the North of the site alongside the dedicated pedestrian and cycle link, 1.22ha of amenity green space to the South of the developable area and 0.05ha of children's play area provision comprising both a Local Area for Play (LAP) and a Local Equipped Area for Play (LEAP). A financial contribution will also be made toward off-site open space and indoor sport provision. Full details of the open space strategy and financial contributions are set out in Section 9.0 and 12.0.

3.5 The proposed surface water drainage strategy comprises rainwater harvesting, permeable paving, bioretention areas and swales and an above ground attenuation feature which will drain to an existing ditch to the southeast of the application site. The proposed attenuation feature has been designed to hold water and has been incorporated as part of the amenity green space to improve the visual amenity for future residents. The proposed development also includes provision of a pumping station located to the west of the attenuation feature. Full details of the drainage strategy are set out in Section 11.0.

3.6 As detailed above the proposed development has been designed to retain as many existing trees on site as possible and in turn will only require the felling of one tree and 78m of hedgerow. As part of the on-site Biodiversity Net Gain strategy, it is proposed to plant at least 168 new trees, 84m of native hedgerow and enhance 1.49ha of grassland. Together the proposed development will deliver a 17.49% net gain in Habitat Units and a 18.17% net gain in Hedgerow Units. Full details of the environmental strategy are set out at Section 10.0.

3.7 The proposed development has been designed to be Net Zero in operation. This will be achieved through the adoption of Passivhaus design principles, a communal Ground Source Heat Pump (GSHP) system and provision of approximately 685 rooftop mounted solar PV panels. Full details of the energy and sustainability strategy are set out in Section 11.0.

3.8 The proposed development will include a Community Infrastructure Levy (CIL) in addition to financial contributions toward off-site open space, indoor sport, education and air quality. Full details of the CIL and a draft Heads of Terms for the planning obligations are set out in Section 12.0.

4.0 NATIONAL PLANNING POLICY

4.1 National planning policy is contained within the National Planning Policy Framework (NPPF) adopted 2012 (as amended December 2024) and the Planning Practice Guidance (PPG).

4.2 The NPPF identifies at paragraph 7 that: "*The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner*" and identifies three overarching objectives, which are economic, social and environmental.

4.3 Paragraph 10 goes onto state: "*So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11)".*

4.4 Paragraph 11 states that: "*For decision-taking this means:*

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, ***or the policies which are most important for determining the application are out-of-date8*** *, granting permission unless:*

i. the application of policies in this Framework that protect areas or assets of particular importance7 ***provides a strong reason for refusing the development*** *proposed; or*

ii. ***any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole****, having* ***particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes****, individually or in combination9* ." [Emphasis added]

4.5 Paragraph 11d is of specific relevance to this application and is discussed below in more detail.

4.6 Government seeks to encourage Local Planning Authorities (LPA) to be positive in their decision making, stipulating at Paragraph 39 that "*Local planning authorities should approach decisions on proposed development in a* ***positive and creative way****. They should use the full range of planning tools available, including brownfield registers and permission in principle, and* ***work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible***." [emphasis added]

4.7 As set out in Section 5 of the NPPF, one of the Government's objectives is to deliver a sufficient supply of new homes. Paragraph 61 states that "*To support* ***the Government's objective of significantly boosting the supply of homes****, it is important that a sufficient amount and variety of land can come forward where it is needed, that* ***the needs of groups with specific housing requirements are addressed*** *and that land with permission is developed without unnecessary delay. The* ***overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community***." [Emphasis added].

4.8 Of specific relevance to this application is Paragraph 78 which requires Local Planning Authorities to update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing for decision making purposes if their adopted plan is more than five years old.

4.9 The National Planning Practice Guidance (NPPG) on Housing supply and delivery states at Paragraph 008 that "*In decision-taking, if an authority* ***cannot demonstrate a 5 year housing land supply****, including any appropriate buffer,* ***the presumption in favour of sustainable development will apply, as set out in paragraph 11d of the National Planning Policy Framework***." [Emphasis added].

4.10 The following Chapters and Paragraphs are considered to be relevant to the application at hand:

Chapter	Relevant Paragraphs
2. Achieving sustainable development	7, 8, 10, 11(d)
4. Decision-making	39, 48, 49
5. Delivering a sufficient supply of homes	66, 71, 73, 78
8. Promoting healthy and safe communities	96, 103
9. Promoting sustainable transport	109, 115, 116, 117, 118
11. Making effective use of land	124, 129
12. Achieving well-designed places	131, 135, 136, 139
14. Meeting the challenge of climate change, flooding and coastal change	161, 163, 164, 166, 181, 182
15. Conserving and enhancing the natural environment	187, 193, 198, 199
16. Conserving and enhancing the historic environment	216

4.11 Consideration has also been given to the National Design Guide (NGD).

5.0 LOCAL PLANNING POLICY

5.1 Local planning policy is contained within the Rugby Borough Local Plan 2011-2031 adopted on 4 June 2019. The policies most relevant to the determination of this application are as follows:

- GP1: Securing Sustainable Development
- GP2: Settlement Hierarchy
- DS1: Overall Development Needs
- H1: Informing Housing Mix
- H2: Affordable Housing Provision
- H6: Specialist Housing
- HS1: Healthy, Safe and Inclusive Communities
- HS2: Health Impact Assessments
- HS4: Open Space, Sports Facilities and Recreation
- HS5: Traffic Generation and Air Quality
- NE1: Protecting Designated Biodiversity and Geodiversity Assets
- NE2: Strategic Green and Blue Infrastructure
- NE3: Landscape Protection and Enhancement
- SDC1: Sustainable Design
- SDC2: Landscaping
- SDC3: Protecting and Enhancing the Historic Environment
- SDC4: Sustainable Buildings
- SDC5: Flood Risk Management
- SDC6: Sustainable Drainage
- SDC7: Protection of the Water Environment and Water Supply

- D1: Transport
- D2: Parking facilities
- D3: Infrastructure and Implementation
- D4: Planning Obligations

5.2 Consideration has also been given to the following Supplementary Planning Documents and Guidance:

- Air Quality SPD
- Climate Change and Sustainable Design and Construction SPD
- Housing Needs SPD
- Planning Obligations SPD
- Rainsbrook Valley Landscape Sensitivity Study (January 2017)
- Warwickshire Design Guide
- Housing Land Supply Position Statement 2025-2030

5.3 Although the site is not located with the South West Rugby SUE, given the site's proximity, consideration has also been given to the:

- South West Rugby Masterplan SPD; and
- South West Rugby Design Code SPD

5.4 In accordance with Paragraph 49 in the NPPF, due consideration has also been given to the Rugby Borough Local Plan Preferred Option Consultation Document March 2025. The policies most relevant to the determination of this application are as follows:

- S1 Settlement hierarchy
- S2 Strategy for homes
- S5 Countryside protection
- CL1 Net zero buildings

- CL3 Water supply, quality and efficiency
- CL4 Climate adaptation
- EN1 Biodiversity and geodiversity protection
- EN2 Landscape protection
- EN4 Biodiversity net gain
- EN5 Canopy cover
- EN6 Flood risk
- EN7 Environmental protection and amenity
- EN8 Air quality
- H1 Housing mix
- H2 Affordable housing
- H6 Specialist housing
- H7 Housing standards
- W2 Open space and sports provision
- D1 Well-designed places
- D3 Landscaping
- D4 Historic environment
- D5 Sustainable drainage
- I1 Transport
- I2 Parking
- I4 Infrastructure and planning obligations
- I6 Secondary education

5.5 Due consideration has also been given to the evidence base published alongside the Regulation 18 Local Plan review Preferred Options consultation. This includes the following documents:

- Housing and Economic Development Needs Assessment (HEDNA) November 2022
- HEDNA-WMSESS Alignment Paper November 2024
- Landscape Character Assessment January 2025

6.0 MATERIAL PLANNING CONSIDERATIONS

6.1 The following sections address the relevant material planning considerations to this application which includes the following:

- Principle of Development and the Presumption in Favour of Sustainable Development
- Housing
- Healthy, Safe and Inclusive Communities
- Natural Environment
- Sustainable Design and Construction
- Delivery

7.0 PRINCIPLE OF DEVELOPMENT AND THE PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

7.1 The application site is located beyond the defined settlement boundary to Rugby Town as identified on the adopted Rugby Borough Local Plan Urban Policies Map 2019 and is therefore deemed to be within the 'Countryside' as detailed within the Settlement Hierarchy at Policy GP2. Policy GP2 states, that in the countryside, "*New development will be resisted;* ***only where national policy on countryside locations allows will development be permitted***." This is expanded on at Paragraph 3.14 which states that *inter alia* "*Countryside locations are those which are not defined by a settlement boundary and are therefore* ***generally*** *unsuitable for development; in these locations inappropriate development will be resisted and* ***only where national policy on countryside locations allows will development be permitted***." [Emphasis added]. Paragraph 3.14 goes onto add however that "*As indicated above,* ***the only anticipated variations to this approach will be the exceptional delivery of housing to meet a specifically identified housing need*** *or types of development that are intrinsically appropriate to a countryside setting*." [Emphasis added].

7.2 It is a significant material consideration then that Rugby Borough Council cannot currently demonstrate a 5-year supply of housing. The 5 Year Housing Land Supply Position Statement 2025-2030 confirms that for the five-year period 1 April 2025 to 31 March 2030 the Council can only identify a housing land supply of 4.16 years against the standard method requirement which equates to a shortfall of 542 dwellings.

7.3 [redacted] have undertaken a Rugby 5 Year Housing Supply Position Assessment for the period 01 November 2025 to 31 October 2030 which has been submitted alongside this application. Based on analysis of deliverable sites for the five-year period 01 November 2025 to 31 October 2030, the Rugby 5 Year Housing Supply Position Assessment concludes that Rugby Borough Council can only demonstrate a housing land supply of 2.85 years against their local housing need (equating to a shortfall of 1435 dwellings). A full summary of these calculations is presented at Section 6 Paragraph 6.1 of the Rugby 5 Year Housing Supply Position Assessment.

7.4 As Rugby Borough Council cannot demonstrate a 5-year supply of housing against their local housing need and as a period of five years from the date of the plan's adoption has lapsed (see NPPF Footnote 8 and Paragraph 232), Paragraph 11(d) is engaged. Paragraph 11(d) states that "*Plans and decisions should apply a presumption in favour of sustainable development.*

*For **decision-taking** this means:*

*d) where there are no relevant development plan policies, or **the policies which are most important for determining the application are out-of-date8** , granting permission unless:*

*i. the application of **policies in this Framework that protect areas or assets of particular importance7 provides a strong reason for refusing the development proposed**; or*

ii. ***any adverse impacts** of doing so would **significantly and demonstrably outweigh the benefits**, when **assessed against the policies in this Framework taken as a whole**, having **particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination9***". [Emphasis added]

7.5 In accordance with Paragraph 11(d) and Footnote 8, Policy GP2, which restricts development outside of the defined settlement boundaries, should be considered out-of-date and afforded limited weight for the purposes of decision-making.

7.6 Turning then to directing development toward a sustainable location, the application site is located immediately to the South of 'Ashlawn Gardens' which comprises 860 residential dwellings forming part of the South West Rugby Sustainable Urban Extension (SUE) and the current extent of the Rugby Urban edge. The 'Ashlawn Gardens' development was granted outline planning permission pursuant to Local Authority reference R13/2102 which has since been followed by several reserved matters applications (Local Authority references R19/0854, R19/0941, R19/1185, R20/0124, R21/0904, R22/1328 and R23/0573). Of specific note, Local Authority reference R13/2102 secures provision to construct a new primary school (Ashlawn Primary School) on the corner of the B4429/Ashlawn Road and Bilton Fields Farm Lane. Ashlawn Primary School will be a 2 Form Entry (2FE) primary school including an Early Years (EY) facility, integrated Special Educational Needs and Disabilities (SEND) resource, and Specialist Resourced Provision (SRP). Local Authority references R13/2102 and R23/0573 have also secured provision of 3 sports pitches (in an area of 2.04ha) comprising one U15/16 football pitch (11v11), one U13/14 football pitch (11v11), one U11/12 football pitch (9v9) and allows for the U9/10 (7v7) pitch to be provided within the U15/16 (11v11) pitch. Ashlawn Primary School and the three sports pitches would be located ~800m (12-minute walk/ 3-minute cycle) from the application site.

7.7 It should be noted that whilst the settlement boundary for Rugby Town on the Rugby Borough Local Plan Urban Policies Map 2019 only extends to the dwellings located on the south side of 'Norton Leys', 'Ecton Leys', 'Holcot Leys' and 'Brafield Leys' the Policies Map (Reg 18) published alongside the Local Plan review Preferred Options consultation on 24 March 2025, shows that the settlement boundaries at Emerging Policy S1 would be extended to include the 'Ashlawn Gardens' development and would in turn run along the B4429/Ashlawn Road. As a result, the application site would directly adjoin the defined settlement boundary to Rugby Town which as set out in the settlement hierarchies to both Policy GP2 and Emerging Policy S1, is the most sustainable settlement for development within the Borough.

7.8 It should also be emphasised that immediately to the west of the site is the 'Site Of Former Inwoods House' which was granted planning permission for a retirement village consisting of 11 bungalows (Use Class C2), 40 apartments (Use Class C2) and a 59-bed care home (Use Class C2) pursuant to Local Authority References R16/2333 and R20/0213 before being replaced by planning permission for 25 residential dwellings pursuant to Local Authority Reference R23/0491. The Officer's Report to Local Authority Reference R23/0491 (see Appendix 1) states, in regard to the sites location that "*The application site is adjacent to the David Wilson development, Ashlawn Gardens, which is currently been constructed (circa 860 dwellings), and will form the new urban edge boundary, to the north of the application site and adjacent to the other side of the Ashlawn Road. The* ***Ashlawn Road provides vehicle access, a cycle network and provides safe pedestrian routes to include pavements and a traffic controlled pedestrian crossing, to the urban area, the most sustainable location within the Borough, providing the best access to a range of services and facilities. Which would provide moderate weight in favour of the proposal***." [Emphasis added]. It adds further that "*The Council can currently demonstrate a 5-year housing land supply, which carries some weight against the proposal. However, the site is previously developed land, with an extant permission for a residential care home,* ***within a sustainable location***." [Emphasis added].

7.9 With regard to Local Authority References R16/2333 and R20/0213 it should be emphasised that residential care homes are subject to a stricter sustainability test, as it relates to access to essential services, than standard residential dwellings owing to the more restricted movements and specific needs of older people and those with disabilities. Adopted Policy H6 states that regard will be had to "*The ability of future residents to access essential services, including public transport, shops and appropriate health care facilities*." On the basis that the Local Authority deemed the 'Site Of Former Inwoods House' to be a sustainable location for a retirement home, there should be no question that the application site is therefore a sustainable location for residential development (including affordable and specialist housing).

7.10 It should also be emphasised that the application site is not located within the Green Belt and as such this application represents an opportunity to, in part, reduce the Local Authorities 5 year housing supply shortfall without resulting in development within the Green Belt (which would now be supported in principle through the introduction of Paragraph 155 in the NPPF). This would in turn reduce the amount of land required to be released from the Green Belt to meet the Council's Local Housing Need in the emerging Local Plan.

7.11 The proposed development would be bound to the North by 'Ashlawn Gardens' and Ashlawn Lodge, bound to the West by 25 dwellings currently under construction on the 'Site Of Former Inwoods House', bound to the South by Ashlawn House and The Bungalow and bound to the East by Ashlawn Cottage, Hall Cross and Hunters Gap. As such, it would not result in the development of isolated dwellings in the countryside and would be in accordance with Paragraph 84 in the NPPF.

7.12 As set out at Paragraph 8 in the NPPF, achieving sustainable development means that the planning system has three overarching objectives, an economic objective, a social objective and an environmental objective.

ECONOMIC OBJECTIVE

7.13 The NPPF states that the economic objective is "*to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*"

7.14 The erection of up to 90 residential dwellings would have significant localised impacts on the economy. Local tradespeople and suppliers would benefit from the construction project and the ongoing maintenance of the dwellings and services required by the occupants in future years. The Home Builders Federation (HBF) Housing Calculator (see Appendix 2) estimates that 90 residential dwellings would support the employment of 312 people and provide 3 apprentices, graduates or trainees.

7.15 The HBF Housing Calculator estimates that the proposed development would generate approximately £2,400,000 in tax revenue per annum (including Council Tax revenue)**.** Whilst the layout and scale of the proposed dwellings is a reserved matter, it is anticipated that the proposed dwellings would generate between £191,299.50 and £263,036.70 per annum in Council Tax revenue (assuming the proposed dwellings fall within Council Tax Bands C to E). This is broadly consistent with the HBF Housing Calculator, which estimates that the proposed development would generate £181,125 per annum in Council Tax revenue.

7.16 The site lies within the Rural Area Community Infrastructure Levy (CIL) charging zone where the rate is £160 per sqm. With an estimated overall floor area of circa 5,909sqm (excluding affordable housing subject to mandatory social housing relief), this would result in a CIL charge of around £945,440.

7.17 Using the National Housing Federations Local Economic Impact Calculator (LEIC) (see Appendix 3), it can be demonstrated that the provision of 28 affordable homes would result in the following direct and indirect economic impacts on Rugby, The West Midlands, England and the UK:

	Rugby	West Midlands	England	UK
Direct Impact				
Gross Value Added (GVA) (£)	1,340,273	1,340,273		
Gross employee earnings (£)	597,193	597,193		
Jobs (annual)	20	20		
Total Impacts				
Gross Value Added (GVA) (£)	2,279,183	3,213,719	3,466,766	3,529,996
Gross employee earnings (£)	1,065,199	1,531,256	1,667,909	1,696,335
Jobs (annual)	33	46	49	50

7.18 The economic benefits of the proposed development are thus considered to carry significant weight in the decision-making process.

SOCIAL OBJECTIVE

7.19 The NPPF states that the social objective is "*to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being*;"

7.20 The Rugby Borough Council Local Plan 2011-2031 (June 2019) sets out three social Spatial Objectives. Objective 1 is "*To protect and enhance existing local services and create new neighbourhoods that contain services that meet the day to day needs of the new communities. Enable appropriate amounts of development in Main Rural Settlements to bolster their role as local service centres*."

7.21 The proposed development would provide excellent access to educational facilities within both Rugby and Dunchurch. A summary of all of the nursery, primary, secondary, independent and special educational schools within 2km of the site which could be reasonably accessed by active modes of travel are summarised in the below table. The access to educational facilities is such that future occupants of the proposed development would not be reliant on the private car to take their children to school.

Service	Name	Distance (as the crow flies)	Travel time
Primary School	Ashlawn Primary School*	~800m	(12-minute walk/ 3-minute cycle)
Secondary School	Rugby Free Secondary School	~850m	(23-minute walk/ 5-minute cycle)
Secondary School	Quest Academy	~1,000m	(20-minute walk/ 5-minute cycle)
Primary School	Rokeby Primary School	~1,200m	(23-minute walk/ 5-minute cycle)
Independent school	Bilton Grange Preparatory School	~1,400m	(27-minute walk/ 6-minute cycle)
Primary school	Bilton Church of England Junior School	~1,500m	(25-minute walk/ 6-minute cycle)
Primary School	Bawnmore Community Infant School	~1,500m	(27-minute walk/ 7-minute cycle)
Nursery school	Little Grange Nursery	~1,700m	(29-minute walk/ 7-minute cycle)
Secondary school	Harris Church of England Academy	~1,700m	(29-minute walk/ 7-minute cycle)
Primary school	Paddox Primary School	~1,700m	(30-minute walk/ 7-minute cycle)
Secondary School	Ashlawn School	~1,800m	(28-minute walk/ 7-minute cycle)

Girls' Secondary School	Rugby High School	~1,800m	(35-minute walk/ 8-minute cycle)
Special education school	Brooke School	~1,800m	(30-minute walk/ 7-minute cycle)
Special education school	Avon Park School	~1,900m	(30-minute walk/ 7-minute cycle)

* To be delivered

7.22 It is proposed to make a financial contribution of £405,648 toward secondary school place provision as detailed further in Section 9.0.

7.23 The proposed development would provide good access to medical and health services. The closest surgery, Dunchurch Surgery, is located some 2.3km from the application site and can be accessed in 4-minutes by car or a 36-minute walk/ 9-minute cycle if using active modes of travel. The Hospital of St Cross is likewise only 1.7km from the application site and can be accessed in 3-minutes by car (8-minutes using public transport) or a 27-minute walk/ 7-minute cycle if using active modes of travel.

7.24 The nearest supermarket, Sainsburys on Dunchurch Road, is located less than 1km from the application site and can be accessed in 4-minutes by car or a 22-minute walk/ 6-minute cycle if using active modes of travel. As such, future occupants would not be dependent on the private car to do their grocery shopping.

7.25 Access to the above local services and facilities would bolster Rugby's role as the main local service centre in the Borough in accordance with Objective 1.

7.26 Social Spatial Objective 2 is to "*Enhance the quality of outdoor and indoor sport, leisure, recreation and cultural facilities within the Borough and to ensure residents have access to good outdoor leisure and recreation facilities through the development of a developing green infrastructure network throughout the Borough*".

7.27 The proposed development would make significant provision of on-site open spaces which will include 0.49ha of natural and semi-natural green space, 1.22ha of amenity green space and 0.05ha of children's play area provision comprising both a Local Area for Play (LAP) and a Local Equipped Area for Play (LEAP). In addition to on-site open space provision, it is proposed to make a financial contribution of £158,105.79 toward off-site open space including allotments, football pitches, Rugby Union pitches and cricket pitches as set out in Section 9.0.

7.28 The proposed development would also make a financial contribution of £53,393.27 toward off-site indoor sport provision including Swimming Pools, Health and Fitness and Sports Hall as set out in Section 9.0.

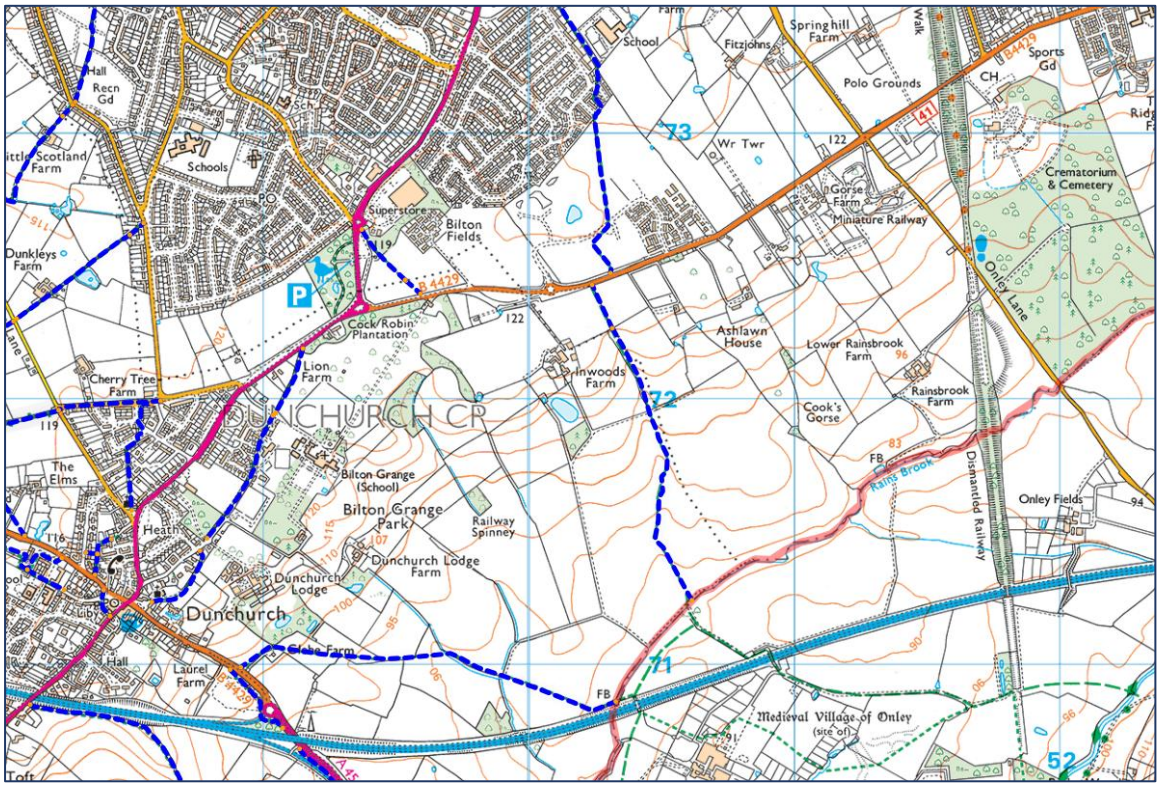
7.29 The proposed development would provide good access to existing leisure and sports facilities. A summary of all the leisure and sports facilities within 2km of the site that could reasonably be accessed by active modes of travel are summarised in the below table.

Service	Name	Distance (as the crow flies)	Travel time
Sports Pitches	Ashlawn Gardens Sports Pitches*	700m	(10-minute walk/ 2-minute cycle)
Equestrian Facilities	Rugby Riding Club	800m	(14-minute walk/ 4-minute cycle)
Country Park	Rugby Diamond Wood Country Park	1,000m	(19-minute walk/ 4-minute cycle)
Park (Including Sports Pitches)	Ashlawn Recreation Ground and St Andrews Rugby Football Club	1,200m	(16-minute walk/ 4-minute cycle)
Leisure Centre	Queens Diamond Jubilee Centre	1,900m	(35-minute walk/ 8-minute cycle)
Sports Centre	Rugby School Sports Centre	2,000m	(40-minute walk/ 11-minute cycle)
Sports Pitches	Dunchurch Sportsfield	2,000m	(28-minute walk/ 7-minute cycle)

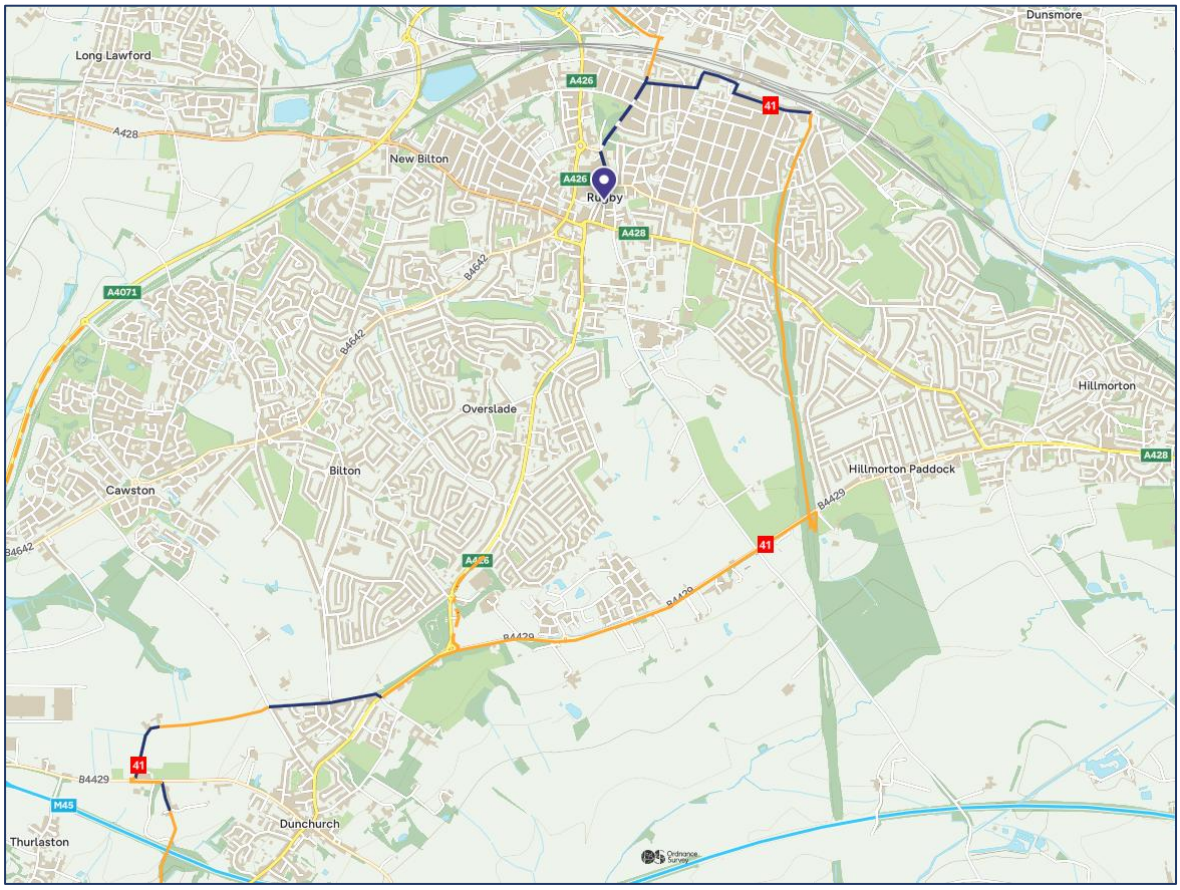
*To be delivered

7.30 The HBF Housing Calculator, estimates that the proposed development would increase leisure spending within the local area by £81,000 per annum.

7.31 Future residents of the proposed development would have good opportunities to walk and cycle within the site locality. The site is located some ~275m from Public Right of Way (PRoW) RB31 and R177 which provide public access to the open countryside between the B4429/Ashlawn Road and Rains Brook to the south (see below) and ~1km from the Great Central Walk which leads from the B4429/Ashlawn Road to Rugby Town Centre. The application site is also located directly off National Cycle Route 41 which runs from the B4439/Ashlawn Road to Rugby Town Centre via the Great Central Walk and to Draycote Water via Dunchurch. The provision of PRoWs, the Great Central Walk and National Cycle Route 41 would encourage active travel and would support an active and healthy lifestyle for future occupants of the proposed dwellings.



Public Rights of Way Map



Sustrans National Cycle Network map

7.32 Social Spatial Objective 3 is "*To ensure all residents of the Borough have a decent and affordable home with particular focus on affordable provision in the rural areas and specialised housing types for the older population*."

7.33 The proposed development would make provision of 28 affordable homes including 23 socially rented dwellings and 5 dwellings for affordable home ownership. Further information as to the affordable housing tenure and housing mix is set out in the Affordable Housing Statement at Section 8.0. It should be emphasised that there is a significant unmet need for affordable housing within Rugby and within Coventry and Warwickshire more widely. Table 8.13 Estimated Need for Social/Affordable Rented Housing by local authority (per annum) (repeated below) establishes that the total net need for affordable housing in Rugby is 407 dwellings per annum with a total net need of 3,833 dwellings per annum in the wider Coventry and Warwickshire area.

Table 8.13 Estimated Need for Social/Affordable Rented Housing by local authority (per annum)

	Current need	Newly forming house-holds	Existing house-holds falling into need	Total Gross Need	Relet Supply	Net Need
Coventry	495	1,667	653	2,816	929	1,887
North Warwickshire	40	163	52	256	124	131
Nuneaton & Bedworth	102	431	188	720	313	407
Rugby	77	398	166	640	233	407
Stratford-on-Avon	81	397	238	716	297	419
Warwick	132	571	204	907	325	582
Warwickshire	431	1,959	848	3,238	1,292	1,946
C & W	926	3,627	1,501	6,054	2,221	3,833

Source: Range of sources

7.34 The proposed development would also make provision of 6 specialist homes for older people and/or those with disabilities. This will include 3 market sheltered houses (housing with support) and 3 market extra care houses (housing with care). 9 dwellings shall also meet the requirements for Category 3 – wheelchair user dwellings set out in Part M4(3) of Schedule 1 to the Building Regulation 2010 (as amended). It should be emphasised that there is a shortfall for specialist housing within Rugby. Table 14.14 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 Rugby (repeated below) shows that Rugby has a current shortfall of 273 market homes with support, increasing to 415 by 2032, and a current shortfall of 283 market homes with care, increasing to 350 by 2032.

Table 14.14 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – Rugby

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/ surplus (-ve)	Addition-al demand to 2032	Shortfall /surplus by 2032
Housing with support	Market	60	369	642	273	143	415
	Affordable	56	1,211	598	-613	133	-480
Total (housing with support)		116	1,580	1,239	-341	276	-65
Housing with care	Market	28	20	303	283	67	350
	Affordable	13	100	144	44	32	75
Total (housing with care)		42	120	446	326	99	425
Residential care bedspaces		37	389	397	8	88	96
Nursing care bedspaces		42	489	446	-43	99	56
Total bedspaces		79	878	843	-35	188	152

Source: Derived from Demographic Projections and Housing LIN/EAC

7.35 The social benefits of the proposed development are considered to carry significant weight in the decision-making process.

ENVIRONMENTAL OBJECTIVE

7.36 The NPPF states that the environmental objective is "*to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy*."

7.37 The Rugby Borough Council Local Plan 2011-2031 (June 2019) sets out three environmental Spatial Objectives (7-9). Objective 7 is to "*Build on Rugby's rural market town character by protecting, utilising and enhancing historic assets and ensuring all new development demonstrates high quality design, maintaining an attractive built environment throughout the Borough*."

7.38 There are no designated heritage assets within or immediately around the application site. As detailed within the Heritage Impact section of this report, although not formally identified as such, Ashlawn House and the surrounding park are considered be a non-designated heritage asset. The layout of the proposed development has been designed to mitigate, as far as possible, the impact on the setting of Ashlawn House and the surrounding park. It is adjudged that the proposed development would pose Less than Substantial Harm to the setting of Ashlawn House and the surrounding park which will need to be weighed against the public benefits of the proposed development.

7.39 The layout of the proposed development is considered to be of high-quality design and would maintain an attractive built environment. This has been achieved through a landscape-led approach to the design which aims to retain the sites parkland character and setting.

7.40 Environmental Spatial Objective 8 is to "*Protect natural species present in the Borough by improving habitats through the enhancement of a green infrastructure network that supports natural and ecological processes*."

7.41 This application is supported with an Ecological Impact Assessment (EcIA), Biodiversity Net Gain (BNG) Assessment and Arboricultural Impact Assessment (AIA). As set out in more detail in Section 10.0 the proposed development would not impact on any internationally designated, nationally statutory designated or non-statutory designated sites nor any protected species. The proposed development would only result in the loss of one tree and 78m of hedgerow planting. In turn, the proposed development would provide a 17.48% and 18.17% net gain in Habitat Units and Hedgerow Units respectively. The proposed Biodiversity Net Gain strategy would be delivered on-site and comprises inter alia 168 urban trees, enhanced grassland habitats and native hedgerow creation. The proposed Biodiversity Net Gain strategy has been designed to take the opportunity to protect, restore and enhance the existing Potential Green Infrastructure Corridor identified on the Green Infrastructure (GI) Policy Map which includes all of the land to the south of Ashlawn House.

7.42 Environmental Spatial Objective 9 is to "*Ensure the challenges of climate change are met by utilising the renewable energy resources present in the Borough, improving the energy efficiency of existing development and ensuring the urban extensions achieve high sustainability standards*."

7.43 This application is supported with an Energy and Sustainability Statement. As set out in more detail at Section 11.0 the proposed energy strategy will comprise a communal ground source heat pump (GSHP) system to provide 100% of the space heating and domestic hot water (DHW) demand across all the proposed dwellings. The proposed energy strategy will also incorporate approximately 685 rooftop solar photovoltaic (PV) panels across the proposed dwellings supporting a site-wide all-electric energy strategy. The proposed energy strategy demonstrates that the proposed development could deliver a site-wide regulated carbon reduction of 102% compared to the baseline Part L 2021 Target Emissions Rate, meaning the scheme achieves net zero regulated emissions in operation.

7.44 Early discussions have been had between the Applicant's Agent and Octopus Energies' Zero Bills Team. In this instance a Zero Bills Home would be defined as the following:

- the homes will not be connected to the gas supply network;

- the homes will be provided with battery storage, heat pumps and photo voltaic panels; and
- the housebuilder delivering the scheme has a partnership agreement with Octopus Energy meaning that occupiers will not receive an energy bill for 10 years guaranteed.

As the proposed development has been designed to be net zero in operation, it is anticipated the proposals could potentially deliver Zero Bills Homes. Octopus Energy have confirmed that to achieve this the proposals would need to utilise an ambient loop Ground Source Heat Pump system (Kensa). Further details would need to come forward at reserved matters to confirm the detailed energy strategy and detailed design of the dwellings meets Octopus Energy's eligibility criteria. It will likewise be necessary for the housebuilder delivering the scheme to enter into a partnership agreement with Octopus Energy at that stage.

7.45 The environmental benefits of the proposed development are considered to carry significant weight in the decision-making process.

8.0 HOUSING

DENSITY

8.1 Layout, scale and design are reserved matters, with that said, the Indicative Masterplan and Density and Building Heights Parameter Plan shows that the development would make an efficient use of the land and achieve an appropriate density. The proposed development would have a lower density to reflect the sites edge of settlement location and to retain the sites prevailing estate parkland character. A maximum of density of 30 dwellings per hectare is therefore proposed on the western part of the site with a maximum of 20 dwellings per hectare proposed on the eastern part of the site to maintain the setting to Ashlawn House. This is considered to be in accordance with Paragraph 129 in the NPPF.

HOUSING MIX

8.2 As detailed elsewhere in this Report, the proposed development would make provision of up to 90 residential dwellings. The proposed mix has been considered against both adopted Policy H1 (Informing Housing Mix) and emerging Policy H1 (Housing Mix) and has therefore been informed by both the Coventry and Warwickshire joint Strategic Housing Market Assessment (SHMA) 2013 (Updated 2015) and the latest Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022. The below table sets out the different mix of dwellings sizes for market housing from the SHMA and HEDNA alongside the housing mix that is proposed as part of the application at hand.

	1-bed	**2-bed**	**3-bed**	**4+ bed**
SHMA 2015	5-10%	25-30%	40-45%	20-25%
HEDNA 2022	10%	30%	45%	15%
Proposed Indicative Housing Mix	6 (9.7%)	18 (29%)	28 (45.2%)	10 (16.1%)

8.3 The proposed development would therefore accommodate a range of market dwelling sizes on site and is therefore considered to comply with both adopted and emerging Policy H1 in this respect.

AFFORDABLE HOUSING STATEMENT

8.4 The proposed development would make provision for 28 affordable housing units comprising 31.1% of the total housing proposed. This would exceed the 30% affordable housing provision required on green field sites by adopted Policy H2 (Affordable Housing Provision) and emerging Policy H2 (Affordable housing) for sites outside of the Rugby Urban Area and should therefore be given significant weight.

8.5 The tenure mix for affordable housing has been informed by emerging Policy H2 and will therefore comprise 23 socially rented dwellings (82.1%) and 5 Affordable home ownership dwellings (17.9%).

8.6 The housing mix for affordable housing has been considered against both adopted Policy H2 (Affordable Housing Provision) and emerging Policy H1 (Housing Mix) and has therefore been informed by both the Coventry and Warwickshire joint Strategic Housing Market Assessment (SHMA) 2013 (Updated 2015) and the latest Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022. The below table sets out the different mix of dwellings sizes for affordable housing from the SHMA and HEDNA alongside the affordable housing mix that is proposed as part of the application at hand.

	1 bed	2 bed	3 bed	4+ bed	Total
SHMA 2015	30-35%	30-35%	20-25%	5-10%	
HEDNA 2022 (Affordable home ownership)	20%	40%	30%	10%	
HEDNA 2022 (Social rent)	35%	30%	20%	15%	
Proposed Housing Mix (Affordable home ownership)	1 (20%)	2 (40%)	1 (20%)	1 (20%)	5
Proposed Housing Mix (Social rent)	8 (34.7%)	7 (30.4%)	5 (21.7%)	3 (13%)	23

8.7 Taking into account the above, the proposed affordable housing tenure and housing mix is considered to be in compliance with the Paragraph 66 in the NPPF, adopted and emerging Policy H2 and emerging Policy H1.

SPECIALIST HOUSING AND HOUSING STANDARDS

8.8 In accordance with emerging Policy H7 (Housing standards) Parts A and B, the proposed dwellings will meet the Nationally Described Space Standards and shall meet the requirements for Category 2 – accessible and adaptable dwellings set out in Part M4(2) of Schedule 1 to the Building Regulations 2010 (as amended).

8.9 In accordance with emerging Policy H7 (Housing standards) Part C, ten per cent of the proposed dwellings (equating to 9 dwellings in total) shall meet the requirements for Category 3 – wheelchair user dwellings set out in Part M4(3) of Schedule 1 to the Building Regulation 2010 (as amended). Of the 9 dwellings designed to meet Part M4(3) standards, 6 will be market dwellings and 3 will be affordable homes to reflect the percentage provision of affordable housing on-site. Of the 3 affordable homes designed to meet Part M4(3) standards 2 will be for social rent whilst the remaining 1 will be for affordable home ownership to reflect the affordable housing tenure mix.

8.10 Adopted Policy S6 (Specialist Housing) and emerging Policy S6 establish that the LPA will support the provision of housing to maximise the independence and choice of older people and those members of the community with specific housing needs. The HEDNA 2022 at Table 14.17 estimates that 6.5% of housing need should be delivered as older persons' housing with the primary need being for housing with care/support. The proposed development would in turn make provision of 6 older persons' housing (which equates to 6.7% of the total housing provision) all of which will be designed to Part M4(3) standards above with the majority also being single storey bungalows or ground floor flats. The tenure mix for older persons' housing has been informed by the specialist housing need for Rugby at Table 14.14 of the HEDNA 2022 which shows a specific shortfall in Rugby for Housing with support (Market) and Housing with care (Market). Reflecting this shortfall, the tenure mix for older persons housing will comprise 3 market sheltered houses (housing with support) and 3 market extra care houses (housing with care).

9.0 HEALTHY, SAFE AND INCLUSIVE COMMUNITIES

HEALTH IMPACT

9.1 A Health Impact Assessment (HIA) undertaken by Sworders is submitted alongside this application. The HIA has been prepared using the NHS Healthy Urban Development Unit (HUDU) Rapid Heath Impact Assessment Tool. A summary of the proposed developments health impacts against the assessment criteria can be found in the Appended HUDU Rapid Health Impact Assessment Matrix. In order to mitigate potential negative health impacts resulting from the development, the following mitigation and enhancement actions are recommended:

- If deemed necessary by the Local Planning Authority appropriate financial contributions are made toward healthcare to mitigate the impact on existing healthcare services.
- A financial contribution is required to make provision for additional secondary school place provision to contribute toward education needs (as set out in the following paragraphs).

- A financial contribution is required to make provision toward off-site open space and indoor sport provision that cannot be achieved on site (as set out in the following paragraphs).
- Details of the management and maintenance of on-site open spaces is to be secured by way of a Section 106 Agreement.
- A Dust Management Plan (DMP) and Construction Environmental Management Plan (CEMP) should be secured by way of a suitably worded condition to minimise construction impacts.
- A financial contribution is required to ensure the proposed development is air quality neutral.

EDUCATION

9.2 Paragraph 11.14 in the adopted Local Plan sets out that "*Warwickshire County Council (WCC) Education identifies, as part of the planning application process, education impacts when there is currently very limited available capacity across many of the town's primary schools. Further housing development, resulting from population growth, will create additional requirements and as a result additional school places (through the extension of existing schools or provision of new schools) will need to be provided. However, WCC Education has also indicated that over time the impact will also be felt on secondary schools. As a result, consideration will need to be given as to whether it is also appropriate/necessary to seek additional financial contributions towards secondary school places. The Council is continuing to work with WCC Education to ensure that the Infrastructure Delivery Plan will identify the necessary education provision required to support the housing allocation proposed through the Local Plan*."

9.3 As the proposed development will generate additional need for school places it is proposed to make a financial contribution in lieu of on-site provision. This has been calculated using the Planning Obligations SPD and Warwickshire County Councils Education Services Developers' Guide to Contributions for Education and Early Years Provision December 2023. Step 1 is to calculate the number of pupils expected to be generated by the development for Early Years, Primary, Secondary, Post-16 and SEND. This has been done using the below calculation in Warwickshire County Councils Education Services Developers' Guide to Contributions for Education and Early Years Provision December 2023.

(Number of Dwellings / 100) x Pupil Yield per 100 dwellings x Number of equivalent year groups for the relevant age range

9.4 In accordance with Warwickshire County Councils Education Services Developers' Guide to Contributions for Education and Early Years Provision December 2023 1-bedroom dwellings and specialist housing for older people has been discounted. This generates a total of 75 eligible dwellings.

9.5 Using the calculation in the Warwickshire County Councils Education Services Developers' Guide to Contributions for Education and Early Years Provision December 2023 and the Pupil Yield figure for Rugby generates the following number of pupils generated by the development:

Year Group	Pupils Generated (Mainstream)	Pupils Generated (SEND)
Early Years	5	0
Primary	26	1
Secondary	18	0
Post-16	4	1

9.6 Step 2 is to assess the current and forecast capacity in existing schools relevant to the development. Warwickshire County Councils Education Services Developers' Guide to Contributions for Education and Early Years Provision December 2023 details that "*Contributions towards the provision of additional places will not be sought where pupil forecasts suggest that existing local schools within a suitable distance* [2 miles walking distance for primary schools and 3 miles walking distance for secondary schools] *can reasonably accommodate the expected increases in demand for places*."

9.7 The WCC Annual Education Sufficiency Update confirms at Section 5.1 that for Age 0-4 – Early Years and Childcare (0-14yrs & 0-18yrs with SEND), there is sufficient capacity to provide early years and childcare places to all that require it. As such no contribution should be sought.

9.8 The WCC Annual Education Sufficiency Update Appendix 4 Mainstream pupil forecasts (4-16) confirms that there is primary school capacity in Rugby Central South over the period 2024 – 2029. As such no contribution should be sought.

9.9 The WCC Annual Education Sufficiency Update Appendix 4 Mainstream pupil forecasts (4-16) confirms that secondary school capacity is under 5%, dropping to between 2% and 0% for Rugby South over the period 2024 – 2029. As such, a financial contribution will be required toward the costs of providing additional secondary school places. As set out in Section 3.1 of Warwickshire County Councils Education Services Developers' Guide to Contributions for Education and Early Years Provision December 2023 the cost per secondary school place is £22,536. As such the indicative proposed financial contribution toward secondary school place provision is £405,648.

9.10 The WCC Annual Education Sufficiency Update Section 5.3 Age 16-25 – Post-16 Education confirms that there is Post-16 capacity at the school sixth forms at Rugby Free Secondary School, Bilton School and Ashlawn School, all of which are located within 3 miles of the proposed development. As such no contribution should be sought.

9.11 The application site is located within Statutory walking distance of several primary and secondary schools as set in Section 7. It should also be re-emphasised that Local Authority reference R13/2102 secures provision to construct a new primary school (Ashlawn Primary School) on the corner of the B4429/Ashlawn Road and Bilton Fields Farm Lane. Ashlawn Primary School will be a 2 Form Entry (2FE) primary school including an Early Years (EY) facility, integrated Special Educational Needs and Disabilities (SEND) resource, and Specialist Resourced Provision (SRP). As such it is considered that financial contributions to secure Home to School Transport would not be required.

9.12 It should be noted emerging Policy I6 states that "*All new residential development in the borough which is major development shall contribute £X,XXXX per dwelling (or such updated amount as may be identified through an SPD) to the cost of delivery of expanded secondary education provision in the borough to meet future need*." At the time of writing the proposed financial contribution has not been determined. Should this figure exceed the proposed indicative financial contribution above, the proposed financial contribution will be increased accordingly.

9.13 Taking into account the above, the proposed development is considered to be in accordance with the NPPF Chapter 8, Policy D4 and Emerging Policy I6.

OPEN SPACE PROVISION

9.14 Open space provision has been calculated in accordance with Policy HS4 and emerging Policy W2. The below table summaries each of the policy requirements against the proposed development taking the population of the proposed development as 216 people (2.4 people per dwelling):

Typology	Policy HS4 Area Requirement	Emerging Policy W2 Area Requirement	Proposed Development	Surplus/need using highest requirement (+/-)
Children's Play/	0.0432ha	0.0432ha	0.0525ha	+0.0093ha

Provision for Children & Young People				
Natural and Semi Natural Green Space	0.54ha	0.54ha	0.4917ha	-0.0483ha
Parks and Gardens/ Parks & recreation grounds	0.324ha	0.27ha	0ha	-0.324ha
Amenity green spaces	0.2376ha	0.27432ha	1.2184ha	+0.94408ha

Allotments	0.1404ha	0.1404ha	0	-0.1404ha
Rugby union	0.06912ha	0.05184 pitches	0	-0.06912ha or -0.05184 pitches
Adult football	0.08208ha	0.04752 pitches	0	-0.08208ha or -0.04752 pitches
Youth football	Included in above	0.0972 pitches	0	-0.0972 pitches
Mini soccer	Included in above	0.07992 pitches	0	-0.07992 pitches
Hockey	NA	0.00432 pitches	0	-0.00432 pitches
3G	NA	0.0108 pitches	0	-0.0108 pitches
Cricket	0.04968ha	0.0216 pitches	0	-0.04968ha or 0.0216 pitches

9.15 As detailed in the table above, the proposed development would make provision on-site for a children's play area, natural and semi natural green space and amenity green space. The ongoing management and monitoring of this on-site open space provision should be secured by way of a Section 106 Agreement.

9.16 As detailed in the table above, the proposed development would exceed the required provision of Children's Play/ Provision for Children & Young People and Amenity Green Spaces on-site.

9.17 Policy HS4 sets out that "*Account will be taken of the existing open space provision within the ward or parish the development proposal is located within (contained within Appendix 4). Contributions through* ***CIL/S106 will be sought from developments where the proposal would further increase an existing deficit in provision or where the proposal will result in the provision standards not being met within the ward or parish it is located within****. For the outdoor sports playing pitches account should be taken of the* ***latest Playing Pitch Strategy*** *standard to ascertain whether the demand arising from a proposed development can be met within the existing network of accessible playing pitches that are of sufficient quality, or whether new or improved quality provision will be required*." Appendix 4 has now been updated by Appendix 2 in the Rugby Borough Preferred Option Consultation March 2025 based upon the Playing Pitch and Outdoor Sport Strategy July 2023 and is therefore considered to offer a more robust assessment of need. Appendix 2 (Existing provision table) sets out the below need for Dunsmore Ward:

	Allotments (ha per 1,000)	**Amenity Greenspace (ha per 1,000)**	**Natural & Semi-Natural Space**	**Parks & Recreation Grounds**	**Provision for Children & Young People**
Appendix 2 (Emerging) Surplus/Deficit (+/-)	-0.20	-0.64	43.65	3.42	-0.07
Proposed Development	Financial Contribution Required	Delivered On-Site	Surplus No Financial Contribution Required	Surplus No Financial Contribution Required	Delivered On-Site

9.18 As Appendix 2 (Existing provision table) identifies a surplus in Natural and Semi-Natural Space and Parks and Recreation Grounds, in accordance with Policy HS4, no financial contribution will be required with respect to these typologies.

9.19 The proposed development would make a financial contribution to secure off-site provision of the open space typologies that cannot be made on-site, where there exists a deficit, in addition to playing pitches. The below table compares the total cost of each typology as set out within the Planning Obligations SPD and Appendix 2 (Off-site provision and maintenance cost table and Playing pitch cost table) to the Rugby Borough Preferred Option Consultation March 2025. The proposed financial contribution has been taken as the larger of the two figures.

Typology	Total Cost (Planning Obligations SPD)	Total Cost (Appendix 2)	Required Provision	Proposed Financial Contribution
Allotments	£6.67/sqm	£8.03/sqm	0.1404ha/ 1404sqm	£11,274.12
Adult football	£12.32/sqm	£805,004/pitch	0.08208ha/ 820.8sqm/ 0.04752 pitches	£38,253.79
Youth football	NA	NA	0.0972 pitches	TBC
Mini soccer	NA	NA	0.07992 pitches	TBC
Rugby union	£12.32/sqm	£1,140,476/pitch	0.06912ha/ 691.2sqm/ 0.05184 pitches	£59,122.28
Cricket	£12.32/sqm	£2,289,611/pitch	0.04968ha/ 496.8sqm/ 0.0216 pitches	£49,455.60
Hockey	NA	NA	0.00432 pitches	TBC
3G	NA	NA	0.0108 pitches	TBC
Total				**£158,105.79**

9.20 As detailed in the above, alongside provision of on-site open space, it is proposed to make a financial contribution of £158,105.79 toward off-site open space. This will be subject to the completion of a Section 106 Agreement. The Applicants would support an additional financial contribution toward Youth Football, Mini Soccer, Hockey and 3G if required.

INDOOR SPORT

9.21 One of the social objectives of the Rugby Borough Council Local Plan 2011-2031 is to enhance the quality of indoor sport. Given the nature of the application site and the proposed development, it is not proposed to deliver any new indoor sports provision on-site. As set out within the Planning Obligations SPD "*Contributions will be sought for all residential developments of 10 units or more to meet the West Midlands provision standards for swimming, health & fitness, sports halls and indoor bowls in 2026*." The below table sets out the total cost of each provision as set out within the Planning Obligations SPD:

Provision	Standard	Total Cost	Required provision	Proposed Financial Contribution
Swimming Pools(m^2)	11.18 m^2 per 1000 population 0.01 per person	£2,535 per m^2	2.41488sqm	£6,121.72
Health & Fitness	4.12 gym stations per 1000 population 0.00412 gym stations per person	£3,000 per station	0.88992sqm	£2,669.76

Sports Hall	0.32 courts per 1000 population 0.00032 courts per person	£654,266 per court	0.06912sqm	£44,600.79
Total				**£53,392.27**

9.22 As detailed above, it is proposed to make a financial contribution of £53,393.27 toward indoor sport provision.

9.23 Taking into account the above, the proposed development is considered to be in accordance with the NPPF Paragraph 103, Policy HS4 and D4 and Emerging Policy W2.

AIR QUALITY

9.24 An Air Quality Assessment (AQA) undertaken by Stantec is submitted alongside this application which covers air quality associated with the construction and operational phases of the proposed development.

9.25 The Construction Phase Assessment concludes that the proposed development is considered to be Medium Risk for nuisance dust soiling effects and a Low Risk for PM10 health effects. The report includes at Appendix E Construction Dust Mitigation and recommends that these measures be included within a Construction Environment Management Plan (CEMP) which should effectively reduce the risk of impacts to negligible during the construction phase. A CEMP should be secured by way of a suitable worded planning condition.

9.26 The Operational Phase Assessment finds that the proposed development is; not predicted to exceed the annual mean NO2, PM10 or PM2.5 AQALs, a negligible impact on annual mean NO2, PM10 or PM2.5 concentrations has been predicted at all considered sensitive receptor locations, exceedances of the 1-hour mean NO2 and 24-hour mean PM10 AQALs are considered unlikely and that the proposed development will not introduce any new receptors into an area of exceedance of any relevant AQAL.

9.27 As set out within Policy HS5 and emerging Policy EN8, major development within the Air Quality Management Area (AQMA) must achieve or exceed air quality neutral standards or offset the shortfall. As detailed within the AQA and elsewhere in this report, the proposed development does include design solutions and on-site measures to improve air quality. This includes the following:

- Retention of tree buffer along Ashlawn Road separating the proposed dwellings from the public highway
- Green Infrastructure (comprising 1.22ha of amenity green space, 0.49ha of on-site public natural and semi-natural green space comprising enhanced grasslands and at least168 new trees)
- Pedestrian and cycling infrastructure including a pedestrian refuge island crossing and pedestrian and cycle links through the site
- 1 Level 2 7kW EV charger per dwelling
- No gas heating through an all-electric energy strategy
- Travel Plan

9.28 The AQA, however, sets out that the aim is to go above and beyond with regard to damage costs and offsetting air quality impacts and therefore includes a financial contribution of £16,515 to mitigate the increase in Nox and PM2.5 emissions. This will be subject to the completion of a Section 106 Agreement.

9.29 Taking the above into consideration, the proposed development is considered to be in accordance with the NPPF Paragraph 199, Policy HS5 and Emerging Policy EN8.

AMENITY IMPACT

9.30 The proposed development has been designed to not cause or be affected by unacceptable harm to human health, living conditions or the natural environment through air (including odour), water, noise, or light pollution, vibration, insects, vermin, land contamination or instability.

9.31 A Ground Conditions Desk Study undertaken by Stantec is submitted alongside this application. The Report concludes that it is unlikely that the site would be classified as Contaminated Land under Part 2A of the EPA 1990 and that the overall risk for a redeveloped site is assessed to be low, with some specific potentially moderate risks if not remediated. In order to confirm the actual risks to receptors and confirm the ground conditions with respect to potential geotechnical and geo-environmental risks, the report recommends that an appropriate intrusive investigation is undertaken. The report recommends that this should be secured by means of an appropriately worded Planning Condition, and if found to be necessary, remediation.

9.32 As detailed above the AQA finds that the proposed development will not introduce any new receptors into an area of exceedance of any relevant AQAL and therefore the proposed development would not cause unacceptable harm to human health with respect to air quality.

9.33 Specific consideration has been given to ensure that the proposed development would not have an unacceptable impact on the amenity of future occupants (including future occupants of the 25 dwellings at 'Site Of Former Inwoods House'), existing occupants at Ashlawn House, The Bungalow and Ashlawn Lodge and Ashlawn Cottage to the East of the site with respect to ventilation, daylight, sunlight, privacy, security and avoiding an overbearing impact. Principally this includes; the provision of a significant buffer zone between proposed residential dwellings and Ashlawn House (and by extension The Bungalow), retention of and proposed tree planting within the buffer zone, reduced height of the closest dwellings and no solar PV panels on the two dwellings fronting Ashlawn House to avoid possible glint and glare; a back-to-back arrangement with the consented dwellings at 'Site Of Former Inwoods House' and the proposed dwellings along the sites western boundary in addition to retention of all existing trees on this boundary; a buffer zone between proposed residential dwellings and Ashlawn Lodge in addition to the retention of the adjacent woodland trees and additional tree planting on the eastern boundary with Ashlawn Cottage (which is already separated by the existing sub-station). No solar PV panels are also proposed to the east facing roof slope of the dwelling closest to Ashlawn Cottage to avoid possible glint and glare.

9.34 There is not anticipated to be any amenity impact on the occupiers of the dwellings at Ashlawn Gardens given the separation of the B4429/Ashlawn Road nor on Hall Cross and Hunters Gap which are separated from the application site by significant boundary planting (further separated by the amenity spaces to the proposed dwellings along the eastern boundary).

9.35 Each of the proposed dwellings would provide adequate levels of amenity for future occupiers and users.

9.36 Taking the above into consideration, the proposed development is considered to be in accordance with the NPPF Paragraphs 196, 198, 198, Policy SDC1 and Emerging Policy EN7.

10.0 NATURAL ENVIRONMENT

ARBORICULTURAL IMPACT

10.1 As detailed elsewhere within this Report, the proposed development has been landscape-led and recognises the importance the existing trees and hedgerows on-site make to the landscape character of the development site. With this in mind, the Indicative Masterplan has been sensitively designed to retain the existing trees on site as far as possible in addition to incorporating significant on-site tree planting.

10.2 An Arboricultural Impact Assessment (AIA) undertaken by Greensted Arboriculture is submitted alongside this application. The AIA confirms there are no veteran trees or ancient woodland within or adjacent to the application site that would be impacted by the proposed development. The proposed development is in accordance with Policy NE1 in this respect.

10.3 The AIA confirms that one Category A Tree from G29 will need to be removed in order to facilitate the primary access into the proposed development although the retention of proximal trees within this boundary tree belt will mitigate the loss. In addition, 78 linear metres of Hedgerows H1 and H2 will also require removal to accommodate the internal access arrangements.

10.4 The AIA adds that three Category A Trees (T3, T30 and T31) would require minor crown management to make space for the proposed development and that lateral root pruning will be required to three Category A Trees (T3, T17, T20).

10.5 Two trees located on the western boundary with 'Inwoods House' are subject to a Tree Preservation Order (TPO No. 396), please see Appendix 4. This includes T40 (T5 in the TPO) and T42 (T12 in the TPO). Both T40 and T42 would not be impacted by the proposed development as shown within the AIA.

10.6 The AIA includes Tree Protection Measures and a Tree Protection Plan (TPP) to mitigate impact on trees during construction.

10.7 The proposed development would make significant provision of new tree planting to reinforce the historic parkland landscape character of the site and to establish an attractive public realm for future occupants. The proposed tree planting would also provide passive cooling in the summer months, increase biodiversity and improve localised air quality by sequestering carbon and other air pollutants and particulate matter from the atmosphere. Proposed tree planting is likely to include a mix of native broadleaf trees including English Oak (Quercus robur) and Common lime (Tilia x europaea) reflecting the existing mix of native broadleaf trees within the application site. Proposed street tree planting would likely comprise Field Maple (Acer campestre) as expressed elsewhere within the locality.

10.8 The proposed development has taken Emerging Policy EN5 (Canopy cover) into consideration. Emerging Policy EN5 states of relevance that:

"*A. All major development, excluding development in Rugby town centre, shall increase the post-development canopy cover to at least 20% of the site area (excluding areas of the site that are high or very high distinctiveness habitats)*

B. Where the canopy cover of the site exceeds 20% before development, the proposal should ensure retention of at least the existing level of canopy cover.

C. In meeting the requirements of this policy, existing canopy should be retained first, before considering new planting."

Paragraph 5.14 adds that "*Existing canopy cover shall be assessed using a BS5837:2012 tree report. Post-development canopy cover will be calculated based on the projected canopy spread at 25 years post-development using the council's approved calculator*."

10.9 At the time of this application, the LPA have not published an approved calculator. In turn, the post-development canopy cover has been calculated as a total percentage of the site area using the crown spread of all of the existing and proposed trees within the application site. The results of this assessment are set out below:

	Application Site	**Post-Development Canopy Cover**
Total Area (Ha)	7.43	1.807
% of Total Area	NA	24.3

10.10 In accordance with Paragraph 5.15, the Applicants would support the use of a suitably worded planning condition to require maintenance of the canopy cover post-development.

10.11 With the above taken into account, the proposed development is considered to be in accordance with NPPF (Chapter 15), Policies NE1, NE3, SDC2 and Emerging Policies EN1, EN2 and EN5.

ECOLOGICAL IMPACT

10.12 An Ecological Impact Assessment (EcIA) undertaken by Maydencroft is submitted alongside this application. The EcIA concludes that the proposed development would have no direct or indirect impacts on any internationally designated, nationally statutory designated or non-statutory designated sites. This is in accordance with Policy NE1.

10.13 The EcIA find that the proposed development would impact on the modified grassland present on site but notes that modified grassland is not considered ecologically significant and does not qualify as an HPI. The EcIA adds that areas of broadleaf woodland, hedgerows and lines of trees may be temporarily impacted during the construction phase. These comments should be read in conjunction with the aforementioned TPP which includes tree protection fencing to the groups of broadleaf woodland, hedgerows and lines of trees during construction to mitigate any potential impacts.

10.14 A Ground Level Tree Assessment (GLTA) has been undertaken and identified several trees on site with potential bat roosting features. All of these trees are to be retained as part of the proposed development as set out within the AIA. The EcIA notes however that due to their proximity to construction activities, there is a risk of disturbance (particularly to trees T25, T28, and T31). The EcIA recommends that further surveys are not considered necessary, provided that the presence of bats is assumed and appropriate mitigation measures are implemented to minimise disturbance during the works.

10.15 Following initial site investigations, eDNA surveys for Great Crested Newts (GCN) have been undertaken and have returned negative results for GCN. No impacts are therefore anticipated.

10.16 Initial site investigations identified a badger sett on the eastern boundary in the northeastern field in addition to a second potential sett which was found along the western boundary in the northwestern field. A Comprehensive Badger Survey was subsequently undertaken which confirmed the presence of a single badger sett. A 20m buffer has in turn been provided to the badger sett.

10.17 The initial site investigation identified a small patch of Japanese Knotweed along the southwest hedgerow boundary to Ashlawn House. A walk-over survey for invasive non-native species site survey was subsequently undertaken to confirm and map the extent of Japanese Knotweed present on the site. Following this a Japanese Knotweed Management Plan (JKMP) has been prepared by Maydencroft and is submitted alongside this application which includes an Integrated Weed Management Plan (IWMP) for controlling and preventing the spread of Japanese Knotweed. It should be emphasised that the JKMP will be implemented outside of the application at hand in accordance with UK legislation for invasive non-native species (INNS). With that said, the implementation of the JKMP should be secured by way of an appropriately worded planning condition.

10.18 The EcIA makes a number of recommendations for mitigation, all of which are to be followed in full and should be secured by way of an appropriately worded planning condition for a Landscape and Ecological Management Plan (LEMP). A summary of the recommendations for mitigation is set out below:

- Follow the results of the BS5837 for retained individual trees, hedgerows, woodlands and lines of trees;
- Follow the Arboricultural Method statement for protection of retained woody vegetation and for the removal of single tree from woodland;
- Woody vegetation removal to be undertaken outside of bird nesting species If undertaken during bird nesting season, an ecologist must first conduct a nesting bird check;
- Installation of ramps or means of escape within any excavations for badgers and hedgehogs;
- 10m buffer around PRF trees and acoustic hoarding to minimise disturbance to roosting bats;
- Sensitive lighting for foraging and commuting bats;
- Sensitive timing and two phase cutting of grassland to protect reptiles.

10.19 The EcIA makes several recommendations for ecological enhancements which includes:

- Provision of bird boxes and bat boxes within trees;
- Provision of reptile hibernacula along woodland boundaries;
- Installation of Swift bricks in the new constructions
- Removal of Japanese knotweed;
- Planting of trees to replace loss of single tree

These recommendations for ecological enhancements are to be followed in full and should be secured by way of an appropriately worded planning condition for a Landscape and Ecological Management Plan (LEMP).

10.20 With the above taken into account, the proposed development is considered to be in accordance with the NPPF (Chapter 15), Policies NE1 and NE3 and Emerging Policy EN1.

BIODIVERSITY NET GAIN

10.21 A Biodiversity Net Gain Assessment and Biodiversity Net Gain Metric undertaken by Maydencroft is submitted alongside this application. It demonstrates that the proposed development would provide a 17.48% (4.65 Units) and 18.17% (0.19 Units) net gain in Habitat Units and Hedgerow Units respectively and therefore exceeds the Statutory 10% requirement as set out in Schedule 7A of the Environment Act 2021. Appeal Decisions have confirmed that Biodiversity Net Gain should be afforded weight in favour when determining applications. In this case, significant weight should be afforded to the delivery of Biodiversity Net Gain that exceeds that 10% Statutory requirement and the 10% requirement set out in emerging Policy EN4.

10.22 The proposed Biodiversity Net Gain strategy would be delivered on-site and comprises *inter alia* 168 urban trees, enhanced grassland habitats and native hedgerow creation. The prioritisation of on-site delivery is in accordance with the hierarchy set out in emerging Policy EN4.

10.23 The proposed Biodiversity Net Gain strategy has been designed to take the opportunity to protect, restore and enhance the existing Potential Green Infrastructure Corridor identified on the Green Infrastructure (GI) Policy Map which includes all of the land to the south of Ashlawn House. The proposed strategy has also taken into consideration the green infrastructure strategy as detailed within the Landscape and Ecological Management Plan (LEMP) at Appendix 2 'Proposed Habitats – SOUTH' to LPA reference R24/0327 at 'Site Of Former Inwoods House' to ensure a link into adjacent sections of the existing Potential Green Infrastructure Corridor. This is considered to be in accordance with Policy NE2 and should be given weight in the decision-making process.

10.24 This application should be subject to the Biodiversity Gain Condition requiring a Habitat Management and Monitoring Plan to secure long term maintenance of habitats. Should the Local Planning Authority consider the proposed strategy to include 'significant onsite enhancements' the Applicants would support securing the proposed net gains by way of a planning obligation.

10.25 With the above taken into account, the proposed development is considered to be in accordance with the NPPF (Chapter 15), Policies NE1 and Emerging Policy EN4.

LANDSCAPE IMPACT

10.26 As detailed elsewhere in this Report and in the Design and Access Statement, the proposed development has been designed as a landscape-led development in order to retain and enhance the sites existing estate parkland character, as experienced within the site, and to mitigate the wider landscape impact on the Rainsbrook Valley. This has been achieved by firstly limiting built development to the Northern part of the site with the lowest landscape sensitivity and prioritising Biodiversity Net Gain and attenuation in the southern part of the site with the highest landscape setting and the lowest topography. This has been achieved secondly by retaining, restoring and enhancing the sites key estate parkland landscape features, namely the trees scattered in the two field parcels, the hedgerow which lines the existing access to Ashlawn House, Ashlawn Lodge and The Bungalow and the grassland habitat. Accordingly, the proposed development would only require the loss of one tree and only 78m of hedgerow to make room for the internal spine road and pedestrian link. Proposed tree planting has prioritised strengthening the eastern and western boundaries (including the boundary with Ashlawn Cottage), strengthening the boundaries with Ashlawn House and the associated orchard and new groups of scattered trees expanding on the existing features. Enhancements are also to be made to restore the existing grassland habitats that, like the scattered tree groups, inform the sites existing estate parkland character. This has been achieved thirdly by retaining the open characteristics of the southern boundary on the western field parcel to retain important landscape views and strengthen the sites connection with the Rainsbrook Valley. Attention has also been given to the layout of the internal spine road which has been designed with sweeping curvature to retain the sense of passing through an estate parkland setting.

10.27 A Landscape Visual Impact Assessment (LVIA) undertaken by ProHort is submitted alongside this application which has informed the layout and landscaping of the proposed development. The LVIA concludes that the "*The Application Site has a distinctive parkland setting and is assessed as of moderate landscape value and largely low sensitivity. A large area of the site to the south, part of which is assessed as high sensitivity due to views over the Rains Brook Valley, will be exclusively green field comprising a SUDs pond and tree planting, creating new habitats that will replicate the parkland feel that gives the Application Site its quality and value.*

The site has a high level of containment and there are good opportunities for mitigation and enhancement. The number of visual receptors is largely limited by the boundary vegetation, woodlands, hedgerows and tree belts in the landscape and built form, particularly from the north and west. Receptors comprise principally of pedestrians and residents in close proximity to the site boundary to the north and east.

It is considered that the Application Site and wider area have a good ability to tolerate the nature/scale of the development without any adverse effect on the local or national landscape character. The proposals conform to local and national policies and in conclusion this assessment does not consider that there are any unacceptable or overriding landscape or visual effects that should preclude the proposed development".

10.28 It should be noted that the Local Plan review Preferred Options consultation contains two draft housing allocations within the Rainsbrook Valley (Land off Barby Lane and East of Kilsby Lane, Hillmorton) that fall within Parcel 14a in the Rainsbrook Valley landscape Sensitivity Study January 2017. Parcel 14a is assessed as having high sensitivity and is not described as having potential for housing. The built area of the proposed development would all fall within 17h which has a high-medium sensitivity. The study states for 17h, with regard to the potential for housing, that "***There is scope for limited development but this should not extend into neighbouring zones****. The existing landscape structure with* ***mature trees must be retained***." [Emphasis added]. As such the proposed development is considered to be sequentially preferable, in landscape impact terms, for residential development when compared to Land off Barby Lane and East of Kilsby Lane, Hillmorton.

10.29 Policy NE3 requires that landscape enhancements should be maintained and managed to secure said enhancements in the long-term. In this case the proposed landscape enhancements would form part of the Biodiversity Net Gain strategy and will therefore be secured for 30 years as part of a Habitat Management and Monitoring Plan (HMMP) which will be subject to the Biodiversity Gain condition. The Applicants would also support a suitably worded condition requiring a Landscape and Ecological Management Plan (LEMP).

10.30 With the above taken into account, the proposed development is considered to be in accordance with the NPPF (Chapter 15), Policy NE3 and Emerging Policy EN2.

11.0 SUSTAINABLE DESIGN AND CONSTRUCTION

SUSTAINABLE DESIGN AND BUILDINGS

11.1 The proposed development has been designed with sustainability at the forefront, in line with emerging policy requirements and Supporting Planning Documents and is supported by an indicative Energy and Sustainability Statement undertaken by EAS in addition to the completed Sustainability Checklist.

11.2 The proposal will take a fabric first approach adopting Passivhaus design principles to reduce the energy demand and CO2 emissions from the proposed development. Each dwelling would be designed to achieve the optimal balance between providing natural daylighting benefits to reduce lighting demand, the provision of passive solar heating to limit space heating demand, whilst limiting summertime solar gains through low solar-transmittance windows and external shade to reduce overheating risks.

11.3 The proposed energy strategy will comprise a communal ground source heat pump (GSHP) system to provide 100% of the space heating and domestic hot water (DHW) demand across all the proposed dwellings. The proposed energy strategy will also incorporate approximately 685 rooftop solar photovoltaic (PV) panels across the proposed dwellings supporting a site-wide all-electric energy strategy. The proposed energy strategy demonstrates that the proposed development could deliver a site-wide regulated carbon reduction of 102% compared to the baseline Part L 2021 Target Emissions Rate, meaning the scheme achieves net zero regulated emissions in operation.

11.4 The proposed fossil fuel free all-electric energy strategy, whilst reducing carbon emissions and supporting long-term climate resilience, will also improve energy security and significantly reduce energy bills for future occupants of the development.

11.5 It should be given significant weight that the proposed development exceeds the requirements of adopted Policy SDC4 and the proposed Future Homes Standard 2025 which only requires new dwellings to be net-zero ready. In turn the proposed development would comply with the ambitious emerging Policy CL1 aligning with Rugby's objective to reduce emissions and go further and faster to achieve net zero carbon development at the earliest opportunity.

11.6 Provision of a detailed Energy and Sustainability Strategy will be submitted at the Reserved Matters stage and should be secured by way of an appropriately worded planning condition. In order to secure the public benefits at this stage, it is suggested that the condition will require the detailed Energy and Sustainability Strategy to demonstrate at least an overall on-site regulated CO2 reduction of 102% against the baseline Part L 2021 Target Emissions Rate.

11.7 Whilst design is a reserved matter, the NPPF states at Paragraph 139(b) that "***significant weight should be given to****:*

b) outstanding or innovative ***designs which promote high levels of sustainability****, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.*"

11.8 Taking the above into consideration, the proposed development is considered to be in accordance with The NPPF Chapter 14, Policy SDC4 and Emerging Policy CL1.

LANDSCAPING

11.9 Landscape Impact is discussed previously in this Report.

11.10 It should be noted that landscaping is a reserved matter, with that said, the proposed development has been landscape-led through a sensitive approach to the indicative layout and design which aims to retain the sites existing estate parkland landscape character and setting and to establish an attractive public realm for future occupants.

11.11 As detailed above, the proposed development will include planting of 168 new trees. Proposed tree planting is likely to include a mix of native broadleaf trees including English Oak (Quercus robur) and Common lime (Tilia x europaea) reflecting the existing mix of native broadleaf trees within the application site. Proposed street tree planting would likely comprise Field Maple (Acer campestre) as expressed elsewhere within the locality.

11.12 Opportunities have been utilised to incorporate sustainable drainage methods (as detailed further elsewhere in this report) into the onsite landscaping. The proposed attenuation basin has been designed as an above ground feature and would contribute to the landscape setting of the site forming part of the on-site open space provision.

11.13 Proposed tree planting, proposed on-site public space and the proposed attenuation basin have been co-located alongside dedicated pedestrian links through the site to create a cohesive development layout with an attractive public realm which helps facilitate active transport through the site.

11.14 Landscaping would also include the provision of Biodiversity Net Gain to the south of the site. This will comprise new tree planting, enhanced grassland habitats and creation of new native hedgerow.

11.15 Hard landscaping has been kept to a minimum and utilises a combination of different surface treatments to soften its impact as detailed within the Design and Access Statement.

11.16 As detailed previously, arrangements for the long-term management and maintenance of landscape features will be included within the Habitat Management and Monitoring Plan (HMMP) which should be secured using the biodiversity gain condition. This would secure the maintenance of significant onsite habitat enhancements for at least 30 years.

11.17 A detailed landscape strategy should be secured by way of a suitably worded planning condition for a Landscape and Ecological Management Plan (LEMP).

11.18 Taking the above into consideration, the proposed development is considered to be in accordance with The NPPF Paragraph 135 and 136, Policy SDC2 and Emerging Policy D3.

HERITAGE IMPACT

11.19 A Heritage Desk-Based Assessment (HDBA) (Report No 2549 June 2025) undertaken by Archaeology Warwickshire is submitted alongside this application. The HDBA finds that there are no designated heritage assets within or immediately around the site which would be impacted by the proposed development.

11.20 With regard to the potential impact on archaeological remains, the HDBA identifies a high potential for significant prehistoric remains within the application site, and a low potential for significant remains from all other periods. Given the potential for prehistoric remains on site, in accordance with Paragraph 207 in the NPPF, a Written Scheme of Investigation (WSI) for an Archaeological Evaluation should be secured by way on appropriately worded condition attached to any grant of planning permission.

11.21 The HDBA determines that, although not formally identified as such, Ashlawn House and the surrounding Park are considered to be a non-designated heritage asset. The NPPF details at Paragraph 216 that "*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets,* ***a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset***." [emphasis added]. This is repeated at adopted Policy SDC3 which states that "*In weighing applications that affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the asset*."

11.22 The proposed development has been carefully designed to reduce the scale of harm on the setting of both Ashlawn House and the Park, this includes the following measures:

1. The retention of the existing mature trees on site which historically formed part of the Park around Ashlawn House (for more information see Arboricultural Impact Assessment) alongside the retention of the majority of the hedgerow either side the access track.

2. The provision of a 'buffer zone' between Ashlawn House and the nearest proposed residential dwellings to provide separation to Ashlawn House and to retain the immediate parkland setting reducing intervisibility between Ashlawn House and proposed residential development.

3. As detailed on the Density and Building Heights Parameter Plan, the nearest residential dwellings to Ashlawn House are to be of single storey design and will not include provision of solar PV panels as to not result in any glint and glare.

4. Proposed tree planting to enhance the setting of the Park and to reduce intervisibility between Ashlawn House and proposed residential development.

5. Provision of informative signage within the site to educate future residents about the history of Ashlawn House.

11.23 The HDBA concludes that "*Given this loss of significance and the steps taken to minimise the impact of the proposed development on Ashlawn House and to improve the parkland character around the House, it is adjudged that* ***the proposed development would pose Less than Substantial Harm to Ashlawn House's setting***." [Emphasis added]. The Less Than Substantial Harm identified as a result of the proposed development on the setting of Ashlawn House and Park will need to be balanced against the public benefits of the development. The public benefits of the development are considered to outweigh the harm. The weighting of public benefits is set out within Section 13.0.

11.24 Taking into account the above, the proposed development would be in accordance with the NPPF (Chapter 16), Adopted Policy SDC3 and Emerging Policy D4.

FLOOD RISK AND DRAINAGE STRATEGY

11.25 A Flood Risk Assessment (FRA) undertaken by Stantec is submitted alongside this application. The FRA demonstrates that the site is located within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. The FRA likewise finds that the site is considered to be at 'low' risk from groundwater flooding, sewer flooding and flooding from artificial sources. With respect to surface water flooding, the FRA concludes that "*Although the majority of the site is situated at a 'very low' risk of surface water flooding, there are isolated areas in the north of the site which are at a 'low' to 'medium' risk of surface water flooding, associated with local topographic lows. However, surface water flood depths are expected to remain below 200mm almost entirely across this part of the site. While the drainage strategy will manage the site's surface water flood risk and any surface water exceedance will follow local topography and flow in a southerly direction away from the site, the below recommendation has been included to manage any residual surface water flood risk:*

> *» It is recommended that, where possible, any new proposed buildings are set higher than surrounding ground levels and that any building entrances / external levels are sloped away from building thresholds*.

When considering the above mitigation, the site is considered to be at a 'low' risk of flooding from surface water."

The above recommendation will be followed when detailed design of the proposed dwellings is undertaken at Reserved Matters.

11.26 The FRA goes onto conclude that "*the proposed development:*

> *» Is suitable in the proposed location;*
>
> *» Will be adequately flood resistant and resilient;*
>
> *» Will not place additional persons at risk of flooding;*
>
> *» Will not increase flood risk elsewhere as a result of the proposed development through the loss of floodplain storage or impedance of flood flows; and*
>
> *» Will put in place measures to ensure surface water is appropriately managed.*

This report concludes that in flood risk context, ***the proposals are safe and appropriate and do not increase flood risk***." [Emphasis added]

11.27 An Outline Drainage Strategy (DS) also undertaken by Stantec is also submitted alongside this application. The DS sets out that the proposed drainage strategy will comprise of provision of rainwater butts to each dwelling, permeable paving, bioretention areas and swales and an attenuation basin in the southwest of the site. The DS concludes that "*this has been shown to provide adequate water quality improvements. The basin has been sized to provide a minimum 300mm freeboard in the critical 1 in 100 year event with 45% climate change allowance, discharging at a rate not exceeding Qbar. Exceedance flows are to be routed along the onsite road towards the basin*." Surface water will be discharged to an existing ditch to the Southeast of site (within the Applicants ownership) via a 400m surface water sewer. The watercourse has been demonstrated to be in good condition with sufficient capacity to receive surface water flows from the proposed development.

11.28 The DS also sets out the proposed foul water drainage strategy which is to connect to the existing local foul sewer that runs through Ashlawn Gardens, north of Ashlawn Road. Given the topography of the site a pump station is required to connect the foul sewer at the correct level.

11.29 Taking into account the above, the proposed development would be in accordance with the NPPF (Chapter 14), Adopted Policies SDC5 and SDC6 and Emerging Policy EN6.

12.0 DELIVERY

TRANSPORT

12.1 The proposed development has been designed using a vision-led approach to transport solutions and will make provision a new priority junction on the southern side of Ashlawn Road for vehicular access, along with two additional segregated pedestrian and cycle connections along the site frontage (with one retaining vehicular access to Ashlawn House, The Bungalow and Ashlawn Lodge.) Opportunities have been taken to improve transport sustainability by enhancing pedestrian and cycle connectivity through the provision of a new pedestrian crossing aligning with natural desire lines for onward travel north into Rugby and the wider surrounding area.

12.2 A Transport Assessment (TA) undertaken by Paul Basham Associates is submitted alongside this application. The TA concludes that "*the proposed development aligns with the sustainable transport objectives of the NPPF and the strategic ambitions of the emerging Rugby Local Plan. The existing and proposed transport infrastructure is well-equipped to encourage modal shift, reduce reliance on private vehicles, and support a well-connected, walkable community. Vehicular access has been appropriately designed to accommodate future demand without generating significant impacts on the local road network, as validated by junction modelling outputs. Overall, the proposal aligns with national and local planning guidance and should be considered acceptable from a transport and highways perspective. We would therefore anticipate that the local authority will view the proposals favourably in terms of highway considerations*." This is in accordance with both Paragraphs 110 and 115 in the NPPF.

12.3 The TA includes at Appendix C detailed access plans which demonstrates that; suitable visibility splays and swept path analysis from the proposed priority junction, suitable pedestrian visibility splays for the proposed pedestrian refuge island crossing and visibility splays and a swept path analysis for the internal spine road can all be achieved for cars, servicing and emergency vehicles.

12.4 The TA also includes a Stage 1 Road Safety Audit (RSA) which made several recommendations. In response to these recommendations, forward visibility splays have been provided for right turning vehicles, Average Annual Daily Traffic (AADT) flows have been checked and mast mounted signs to diagram 610 (Keep left) have been implemented to the proposed refuge island crossing.

12.5 The TA demonstrates that the proposed development would only generate 48 two-way vehicle movements during the AM peak hour (0800-0900) and 44 two-way vehicle movements during the PM peak hour (1700-1800) which would have a negligible impact on the local highway network. Vehicle trip distribution assessment likewise confirms that the proposed development will not result in a significant increase to vehicular movements at the nearby A426/Ashlawn Road roundabout or Ashlawn Road/Barby Road/Onley Lane crossroads junctions.

12.6 As part of the TA, junction modelling has been undertaken to assess the operation of the proposed development access junction. The junction modelling confirms that the proposed development access junction is forecast to operate well within maximum RFC forecasts.

12.7 A Travel Plan (TP) undertaken by [redacted] is also submitted alongside this application. The TP outlines the proposed strategy to encourage residents to use alternative modes of transport to private car journeys and sets out measures to achieve a 10-percentage point modal shift.

12.8 The Applicants would support a financial contribution toward promoting sustainable travel and road safety initiatives within the community associated within the development if requested by Warwickshire County Council. This could include financial contributions toward the approved Ashlawn Road / Barby Road traffic signal junction which was discussed by local residents at the public consultation event (please see Statement of Community Involvement).

12.9 Taking into account all of the above, the proposed development would be in accordance with the NPPF (Chapter 8 and 9), Adopted Policy D1 and Emerging Policy I1.

PARKING

12.10 Proposed parking has been designed in accordance with the Appendix 5 Car Parking Standards of the Adopted Local Plan and Appendix 1 Parking standards from the Emerging Local Plan, which both identify the site location as external to the '*High Access'* zone. Each dwelling would also be provided with secure undercover cycle storage in accordance with Appendix 5 Car Parking Standards of the Adopted Local Plan and Appendix 1 Parking standards from the Emerging Local Plan. Electric vehicle parking provision be provided with one charging point available per dwelling in accordance with Part S of the Building Regulations. Electric vehicle provision will be consistently provided as Level 2 7kW chargers.

12.11 Accordingly, the proposed development would be in accordance with the NPPF (Chapter 9), Adopted Policy D2 and Emerging Policy I2.

BROADBAND STATEMENT

12.12 Policy SDC9 requires that "*Developers of new developments (residential, employment and commercial) will be expected to facilitate and contribute towards the provision of broadband infrastructure suitable to enable the delivery of broadband services across Rugby Borough to ensure that the appropriate service is available to those who need it*". In accordance with Paragraph 10.59 full fibre broadband will be delivered of at least 100Mbps. This should be secured by way of a suitably worded planning condition.

INFRASTRUCTURE AND PLANNING OBLIGATIONS

12.13 The application site is identified as falling within the Rural Area on the Rugby Borough Community Infrastructure Levy Residential Charging Zones Map. Within the Rural Area, 'Residential houses – 11 units or more' are charged at £160 per sq.m. The estimated overall floor area is circa 5,909sqm (excluding affordable housing subject to mandatory social housing relief). This would generate a CIL charge of around £945,440. Community Infrastructure Levy (CIL) - Form 1: CIL Additional Information and Form 10: Charitable and/or Social Housing Relief Claim Form are submitted with this application. It should also be noted that the 9 self-build dwellings would be subject to the self-build exemption. CIL Form 7 has been submitted but has not been completed as this needs to be completed by the self-builder (the Claimant) who would not be the Applicant of the application at hand and therefore would need to be completed at a later stage.

12.14 As detailed elsewhere in this report the proposed development will make planning obligations and financial contribution that will need to be secured by way of a Section 106 Agreement. A draft Heads of Terms providing a summary of the anticipated planning obligations and financial contributions is set out in the table below:

Obligation	Requirement
Affordable Housing	Provision of 28 affordable units (23 Social Rent and 5 Affordable Home Ownership)
M4(3) Accessible Homes	Provision of 9 homes Category 3 – wheelchair user dwellings as set out in Part M4(3) of Schedule 1 to the Building Regulation 2010 (as amended)
Self-Build/Custom Build Housing	Provision of 9 Self-Build/Custom Build plots
Specialist Housing	Provision of 3 Sheltered Homes and 3 Extra Care Homes
Education	Secondary school place provision: £405,648
Health	TBC
Open Space	Management and maintenance of on-site open space provision. Provision of off-site open space typologies and playing pitches: £158,105.79
Indoor Sport	Provision of off-site indoor sport provision: £53,392.27
Air Quality	Mitigation of increase in NOx and PM2.5 emissions: £16,515.00
Planning and Infrastructure	Provision of pedestrian refuge island crossing over Ashlawn Road
Transport Sustainability	TBC by Warwickshire County Council Highways. Could include financial contribution toward approved Ashlawn Road / Barby Road traffic signal junction

Warwickshire County Council Monitoring Fee	TBC
Rugby Borough Council – Monitoring contribution	TBC

12.15 The Applicants would support additional/amended planning obligations that meet the requirements of The Community Infrastructure Levy Regulations 2010 (As Amended).

12.16 The Applicants will enter into an agreement under Section 278 of the Highways Act 1980 (As Amended) to enable the execution of works required on the public highway.

13.0 CONCLUSIONS AND PLANNING BALANCE

13.1 This application is submitted in outline with all matters reserved except for access for the erection of up to 90 residential dwellings (Use Class C3) (including up to; 28 affordable homes, 9 self-build/custom build homes, 9 accessible homes to M4(3) standards and 6 specialist homes), up to 2.28ha of public open space (including natural and semi-natural green space, amenity green space and a child's play area), a pedestrian refuge island crossing and associated development.

13.2 It is a significant material consideration that Rugby Borough Council cannot currently demonstrate a 5-year supply of housing. At the time of writing Rugby Borough Council have acknowledged that they have a 4.16-year supply of housing (which equates to an established shortfall of 542 dwellings over the period 01 April 2025 to 31 March 2030). Sworders have undertaken a Rugby 5 Year Housing Supply Position Assessment for the period 01 November 2025 to 31 October 2030 which has been submitted alongside this application. Based on analysis of deliverable sites for the five-year period 01 November 2025 to 31 October 2030, the Rugby 5 Year Housing Supply Position Assessment concludes that Rugby Borough Council can only demonstrate a housing land supply of 2.85 years against their local housing need (equating to a shortfall of 1435 dwellings).

13.3 As Rugby Borough Council cannot demonstrate a 5-year supply of housing against their local housing need and as a period of five years from the date of the plan's adoption has lapsed (see NPPF Footnote 8 and Paragraph 232), Paragraph 11(d) is engaged. Paragraph 11(d) states that "*Plans and decisions should apply a presumption in favour of sustainable development.*

For decision-taking this means:

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date8 , granting permission unless:

i) the application of policies in this Framework that protect areas or assets of particular importance7 provides a strong reason for refusing the development proposed; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination9".

13.4 The application site is deemed to be a sustainable location for residential development. The application site is located immediately to the south of 'Ashlawn Gardens' which comprises 860 residential dwellings forming part of the South West Rugby Sustainable Urban Extension and the current extent of the Rugby Urban edge. In addition, the Policies Map (Reg 18) published alongside the Local Plan review Preferred Options consultation on 24 March 2025, shows that the settlement boundaries at Emerging Policy S1 would be extended to include the 'Ashlawn Gardens' development and would in turn run along the B4429/Ashlawn Road. As a result, the application site would directly adjoin the defined settlement boundary to Rugby Town, which is the most sustainable settlement for development within the Borough. Furthermore, immediately to the West of the site is the 'Site Of Former Inwoods House' which was granted planning permission for a retirement village consisting of 11 bungalows (Use Class C2), 40 apartments (Use Class C2) and a 59-bed care home (Use Class C2) pursuant to Local Authority References R16/2333 and R20/0213 before being replaced by planning permission for 25 residential dwellings pursuant to Local Authority Reference R23/0491. The Officers Report to Local Authority Reference R23/0491 confirms that the neighbouring site is a sustainable location for residential development.

13.5 Turning to Paragraph 11(d)(i), there are no policies in the NPPF that protect areas or assets of particular importance (as outlined in Footnote 7) that would provide a strong reason for refusing the development proposed. The proposed development:

- would not impact on a habitats site (including a potential Special Protection Areas and possible Special Areas of Conservation, listed or proposed Ramsar sites or sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites at set out in Paragraph 194);
- would not impact on a Sites of Special Scientific Interest; and
- is not designated as Green Belt; and
- is not designated as Local Green Space; and
- would not impact on a National Landscape; and

- would not impact on a National Park (or the Broads); and
- is not defined as Heritage Coast; and
- would not impact on any irreplaceable habitats; and
- is not in an area at risk of flooding or coastal change

13.6 As detailed within the HDBA, Ashlawn House and the surrounding Park are considered be a non-designated heritage asset. Footnote 7 only refers to designated heritage assets and does not include non-designated heritage assets. In any case, the Less Than Substantial Harm identified is not considered to provide a strong reason for refusal and is outweighed be the public benefits (see below). The proposed development would not impact any non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments as set out in Footnote 75.

13.7 Turning to Paragraph 11(d)(ii), a balancing exercise has been undertaken which weighs the adverse impacts of the development against the public benefits, please see below table.

Public Benefits	Adverse Impacts
Benefits to the local economy including new employment creation, increased Council Tax revenues and Community Infrastructure Levy (Policy GP1) [Significant Weight]	Impact on the character and appearance of the countryside (Policy GP2) [Limited Weight]
Provision of 90 residential dwellings including 28 affordable homes, 9 self-build/custom built homes, 9 M4(3) homes and 6 specialist homes (Policies GP1, H1, H2 and H6) [Significant Weight]	Negligible to slight adverse landscape visual impact (Policy NE2) [Limited Weight]
Financial contributions toward additional secondary school places. (Policy GP1 and D4) [Significant Weight]	Less than substantial harm on the setting of a non-designated heritage asset (Ashlawn House and Park) (Policy SDC3) [Limited Weight]
On-site open space provision comprising natural and semi natural green space, amenity green space and a children's play area including both a LAP and LEAP in addition to financial contribution toward off-site open space provision (Policy HS4 and D4) [Significant Weight]	Loss of one Category A Tree and 78 linear meters of hedgerow (Policy NE1) [Limited Weight]
Financial contribution toward off-site provision of indoor sports (Policy HS4 and D4) [Significant Weight]	
Active travel enhancements including a new pedestrian refuge island crossing and dedicated pedestrian and cycle links (Policy D1) [Moderate Weight]	

Energy Strategy comprising GSHP and Solar PV delivering Net-Zero operational carbon emissions (Policies GP1, SDC1 and SDC4) [Significant Weight]	
17.49% and 18.17% Biodiversity Net Gain in Habitat Units and Hedgerow Units respectively (Policy NE1) [Moderate Weight]	
24.3% post-development canopy cover (Emerging Policy EN5) [Limited Weight]	
Enhancements to Potential Green Infrastructure Corridor (Policy NE2) [Moderate Weight]	

13.8 It is considered that the public benefits of the proposed development significantly and demonstrably outweigh the limited adverse impacts when assessed against the policies in the NNPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

13.9 With regard to the policies referenced in Footnote 9:

- The proposed affordable mix meets the identified local needs within the latest Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022 and therefore complies with Paragraph 66.

- The proposed development would not result in any isolated dwellings in the countryside. The application site is bound by residential development to the north at 'Ashlawn Gardens' forming part of the South West Rugby Sustainable Urban Extension and Ashlawn Lodge, 25 dwellings are under construction immediately to the west of the site at the 'Site Of Former Inwoods House', Ashlawn Cottage, Hall Cross and Hunters Gap bound the site to the East and Ashlawn House and The Bungalow lie immediately to the south of the developable site area. The proposed development therefore complies with Paragraph 84.
- Paragraph 91 is not relevant to the application at hand.
- The proposed development promotes active travel through the provision of a new pedestrian refuge island crossing and pedestrian and cycle links through the site which connect to the wider National Cycle Route 41. The application site is likewise within close proximity to public transportation infrastructure including bus stops at Spectrum Avenue and Rugby Station which, in combination with active travel, provides a genuine choice of transport modes. Opportunities have also been taken to promote the uptake of battery electric vehicles to reduce vehicle born emissions and improve air quality and public health. The proposed development therefore complies with Paragraph 110.
- As detailed above sustainable transport modes have been prioritised taking account of the vision for the site. The submitted Transport Assessment demonstrates that safe and suitable access to the site can be achieved for all users, the design of streets, parking areas and other transport elements reflect national guidance and the development would not result in any significant impacts on the transport network (in terms of capacity and congestion), or on highway safety. The proposed development therefore complies with Paragraph 115.

- The proposed development makes efficient use of the land with an appropriate density to the sites edge of settlement location whilst retaining the prevailing estate parkland character and setting to Ashlawn House. The proposed development makes provision in line with the identified need for different types of housing within the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022 in relation to market housing mix, affordable housing tenures and mix and specialist housing. The availability and capacity of infrastructure and services has been assessed. Provision is made on site for open space including amenity green space, natural and semi natural green space and a children's play area. Financial contributions are also proposed for off-site open space, indoor sport and secondary school place provision. As detailed above the proposed development promotes sustainable forms of development to limit future car use. The proposed development has been landscape-led with an emphasis on tree retention, new tree planting and enhancement of grasslands such that the proposed development retains the sites prevailing estate parkland character and results in a well-designed, attractive and healthy place to live. The proposed development therefore complies with Paragraph 129.
- The Indicative Masterplan has been carefully designed and would result in a high-quality landscape-led development that would retain the sites prevailing estate parkland character and add to the overall quality of the area. The site potential has been optimised incorporating an appropriate amount and mix of development alongside significant provision on on-site public open space. This would result in the creation of a safe, inclusive and accessible place which would promote health and well-being, with a high standard of amenity for future residents. Secured by Design principles have been incorporated to reduce potential for crime. The proposed development therefore complies with Paragraph 135.

- Design in a reserved matter, however consideration has been given to the National Design Guide, South West Rugby Design Code SPD and the Warwickshire Design Guide. The proposed development would promote high levels of sustainability. As set out within the Energy and Sustainability Statement, the proposed energy strategy will comprise a communal ground source heat pump (GSHP) system to provide 100% of the space heating and domestic hot water (DHW) demand across all the proposed dwellings and will incorporate approximately 685 rooftop solar photovoltaic (PV) panels across the proposed dwellings supporting a site-wide all-electric energy strategy. The proposed development would in turn achieve Net Zero regulated emissions in operation. The proposed development therefore complies with Paragraph 139.

13.10 Taking all of the above into consideration, the proposed development would comply with both national and local planning policy and Rugby Borough Council are hereby requested to grant planning permission.

Appendix 1 - Officers Report to Local Authority Reference R23/0491 (Separate Document)

Appendix 2 - Home Builders Federation (HBF) Housing Calculator

90

Building 90 homes is estimated to:



Support the employment of 312 people

Provide 3 apprentices, graduates or trainees



Increase open space, community sport, leisure spending by £81,000

Generate £4,050,000 towards new affordable housing



Generate £562,500 towards infrastructure including £253,820.7 towards new and improved schools.



Generate £2,400,000.3 in tax revenue

Including £181,125 in council tax revenue

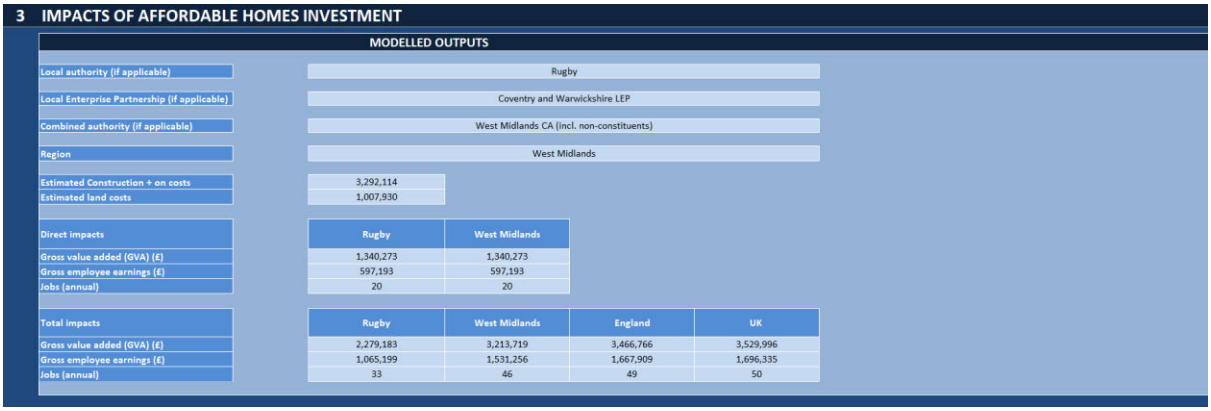
Appendix 3 - National Housing Federations Local Economic Impact Calculator (LEIC)



3 IMPACTS OF AFFORDABLE HOMES INVESTMENT

USER INPUTS

1. Choose input method	Number of homes	
2. Enter number of homes	28	
-		
-		
3. Select geography	Local authority	
4. Select investment area	Rugby	
6. Enter % of products sourced within local authority:		
Entry method:	Product category	For detailed explanation of categories see '6. Detailed product categories' worksheet
		If 'product category' chosen, a % must be entered in all cells C22:C26
Agriculture, forestry and fishing	50%	e.g. food purchased from source
Production	50%	e.g. manufactured goods, energy and utilities
Construction	50%	e.g. housing development services, maintenance and repair
Distribution; transport; accommodation and food	50%	e.g. transport, hotels, restaurants and retail
Other Services	50%	e.g. all other services, e.g. finance, insurance, legal, administative etc.



3 IMPACTS OF AFFORDABLE HOMES INVESTMENT

MODELLED OUTPUTS

Local authority (if applicable)	Rugby
Local Enterprise Partnership (if applicable)	Coventry and Warwickshire LEP
Combined authority (if applicable)	West Midlands CA (incl. non-constituents)
Region	West Midlands
Estimated Construction + on costs	3,292,114
Estimated land costs	1,007,930

Direct impacts	Rugby	West Midlands
Gross value added (GVA) (£)	1,340,273	1,340,273
Gross employee earnings (£)	597,193	597,193
Jobs (annual)	20	20

Total impacts	Rugby	West Midlands	England	UK
Gross value added (GVA) (£)	2,279,183	3,213,719	3,466,766	3,529,996
Gross employee earnings (£)	1,065,199	1,531,256	1,667,909	1,696,335
Jobs (annual)	33	46	49	50

Appendix 4 - 87370 TPO No 396 Inwoods House Ashlawn Road Rugby (Separate Document)

RUGBY 5 YEAR HOUSING SUPPLY POSITION ASSESSMENT FOR THE PERIOD 01 NOVEMBER 2025 TO 31 OCTOBER 2030

SWORDERS
NOVEMBER 2025

SWORDERS
Agricultural Commercial Residential

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Appendices

Appendix 1: Pro Forma for Site Deliverability Assessment Land South of Coventry Road (210 dwellings). South West Rugby Development Parcel 6

Appendix 2: Pro Forma for Site Deliverability Assessment Cawston Spinney (275 dwellings). South West Rugby Development Parcel 12 Plot T2. Tritax Symmetry

1.0 INTRODUCTION

1.1 This Report has been prepared by Sworders to critically examine Rugby Borough Council's 5 Year Housing Supply Position for the period 01 November 2025 to 31 October 2030.

1.2 Rugby Borough Council's most up to date published 5 Year Housing Supply Position is contained within the Housing Land Supply Position Statement 2025-2030. It concludes that as of 01 April 2025 for the period 2025-2030, Rugby Borough Council can only demonstrate a 4.16 Year supply of housing. This equates to an established shortfall of 542 dwellings over the period 01 April 2025 to 31 March 2030.

1.3 This report considers Rugby Borough Council's 5 Year Housing Supply Position by calculating an up-to-date Local Housing Need using the new Standard Methodology and by assessing the deliverability of specific sites outlined in 'Appendix 2 - List of identified 5YHLS sites for 2025-2030' of the Housing Land Supply Position Statement 2025-2030 for the period 2025-2030. Sworders' analysis, having applied the test of deliverability in the National Planning Policy Framework, considers that Rugby Borough Council can only identify a housing land supply of **2.85 years** against their local housing need equating to a **shortfall of 1435 dwellings** over the period 01 November 2025 to 31 October 2025.

1.4 A summary of the analysis is copied below:

	RBC Position	Applicant's Position
Local Housing Need	636	636
5 Year Requirement (with 5% Buffer)	3,339	3,339
Projected Supply Appendix 2 - List of identified 5YHLS sites for 2025-2030	2,797	2,797 (Before Assessment of Sites)
Established Shortfall	542	542 (Before Assessment of Sites)
Established 5 Year Housing Supply	4.16 Years	4.16 years (Before Assessment of Sites)
Assessed Sites		
Coventry Road (Miller Homes)		-86
Cawston Farm 1 (Tritax Symmetry)		-80
Cawston Farm 2 (Tritax Symmetry)		-80
Land South West of Cawston Lane (Catesby Estates)		-75

Land to the North East of Cawston Lane & Land to the East of Alwyn Road (Taylor Wimpey)		-72
Taylor Wimpey remaining land		-20
Eden Park Phases R5, R6, and R7 (Bloor Homes)		-55
Remainder of Houlton allocation		-425
Projected Supply (2025-2030)	2,797	1,904
Shortfall Position	**542**	**1,435**
5 Year Housing Supply	**4.16 years**	**2.85 years**

1.5 The assessment of deliverability within this report has been informed by Lichfield's 'Start to Finish How quickly do large-scale housing sites deliver? THIRD EDITION March 2024' (hereafter referred to as Lichfield's Report) and Appendix F: Estimating the development timeline contained within the 'Housebuilding market study' published by the Competition and Markets Authority (CMA) in February 2024 (hereafter referred to as CMAs Report).

2.0 NATIONAL PLANNING POLICY

2.1 National planning policy is contained within the National Planning Policy Framework (NPPF) as amended December 2024 and the Planning Practice Guidance.

2.2 Paragraph 8(b) sets out that the Government's aim is "*to support strong, vibrant and healthy communities, **by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations**; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being*;" [Emphasis added].

2.3 Chapter 5 sets out the Government's policies on 'Delivering a sufficient supply of homes'. Paragraph 61 states that "*To support the **Government's objective of significantly boosting the supply of homes**, it is important that a **sufficient amount and variety of land can come forward where it is needed**, that the needs of groups with specific housing requirements are addressed and that land with permission is **developed without unnecessary delay**. **The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community**.*" [Emphasis Added]

2.4 Paragraph 78 establishes the need for Local Planning Authorities to provide a minimum of five years' worth of housing. It states that "*Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. **Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing** against their housing requirement set out in adopted strategic policies, or **against their local housing need where the strategic policies are more than five years old**. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*

*a) **5% to ensure choice and competition in the market for land**; or*

b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or

c) *From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework , and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance*." [Emphasis added].

2.5 Rugby Borough Council's strategic policies are contained within the Rugby Borough Council Local Plan 2011-2031 which was adopted in June 2019. As the adopted strategic policies are now more than 5 years old, Rugby Borough Council must provide a minimum of five years' worth of housing against their local housing need which is set out in Section 3.0.

2.6 The National Planning Policy Framework at Annex 2: Glossary defines 'deliverable'. It states that "*To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

a) sites which ***do not involve major development*** *and* ***have planning permission, and all sites with detailed planning permission, should be considered deliverable*** *until permission expires,* ***unless there is clear evidence that homes will not be delivered within five years*** *(for example because they are* ***no longer viable****, there is* ***no longer a demand for the type of units*** *or sites have* ***long term phasing plans****).*

b) where a site ***has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register****, it* ***should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years***." [Emphasis added]

3.0 CALCULATING LOCAL HOUSING NEED USING THE STANDARD METHODOLOGY

3.1 The Planning Practice Guidance sets out how the minimum annual local housing need figure is calculated using the Standard Method at Paragraph: 004 Reference ID: 2a-004-20241212.

3.2 Step 1 is to set the baseline which is calculated as 0.8% of the existing housing stock for the area using the live tables on dwelling stock (Dwelling stock (including vacants) (Table 125: dwelling stock estimates by local authority district). For Rugby the latest figure is 52,209 (2024 unrounded). Therefore, the baseline is 52209 x 0.008 which equates to 417.672 dwellings per annum.

3.3 Step 2 is an adjustment to take account of affordability. The affordability data used is the median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level (Table 5c). The mean average affordability over the five most recent years for Rugby is 7.75. The adjustment factor is therefore as follows:

$$((7.75-5)/5) \times 0.95 + 1 = 1.5225$$

3.4 The minimum annual local housing need figure = housing stock baseline x adjustment factor. 410.744 x 1.5225 = 635.90562

3.5 Therefore, the minimum annual local housing need figure is **636 dwellings per annum** (rounded up from 625.90562).

4.0 CACULATING REQUIRED 5 YEAR SUPPLY OF HOUSING

4.1 As detailed in the previous section, the Standard Methodology generates a local housing need figure of 636 dwellings per annum. Over the 5-year period 2025 – 2030, this generates a local housing need of 3,180 dwellings.

4.2 As detailed in Section 2.0, Paragraph 78 in the NPPF requires that the supply of specific deliverable sites should, in addition, include a buffer of:

a) 5% to ensure choice and competition in the market for land; or

b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or

c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework , and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.

4.3 At the time of writing (April 2025) Paragraph 78(c) can be disregarded. Turning then to Paragraphs 78(a) and (b), Footnote 40 clarifies that significant under delivery of housing over the previous three years is "*measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement*."

4.4 The Housing Delivery Test 2023 confirms that Rugby Borough Council's delivery was 180% and therefore above the 85% threshold for applying the 20% buffer. As such, the 5% buffer needs to be applied to the local housing need which equates to a 5-year housing land supply requirement of **3,339 dwellings over the 5-year period 2025 – 2030.**

5.0 ASSESSMENT OF APPENDIX 2 - LIST OF IDENTIFIED 5YHLS SITES FOR 2025-2030

5.1 The following section of this report provides an up-to-date assessment of the projected supply arising from sites identified within 'Appendix 2 - List of identified 5YHLS sites for 2025-2030' of the Housing Land Supply Position Statement 2025-2030 based upon available information and in accordance with the NPPF definition of deliverability.

Coventry Road (Miller Homes)

5.2 Appendix 2 - List of identified 5YHLS sites for 2025-2030 sets out the below trajectory for Coventry Road (Miller Homes) over the period 2025-2030:

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply	0	35	45	45	40	**165**

5.3 'Outline planning application for up to 210 dwellings, a two form entry primary school, and creation of associated vehicular access, pedestrian /cycle and emergency accesses, highway improvements to Cawston Lane, parking, landscaping, drainage features, open space and associated infrastructure (all matters reserved except vehicular access to the site).' was granted pursuant to Local Authority Reference R18/0936 on 23 December 2022.

5.4 'Application for Reserved Matters for up to 210 dwellings and associated works relating to the layout, scale, appearance and landscaping pursuant to outline planning permission R18/0936 (for up to 210 dwellings, a two form entry primary school, and creation of associated vehicular access, pedestrian /cycle and emergency accesses, highway improvements to Cawston Lane, parking, landscaping, drainage features, open space and associated infrastructure).' Was subsequently submitted pursuant to Local Authority reference R24/0971 and validated on 06 November 2024. Local Planning Authority reference was subsequently granted on 12 September 2025.

5.5 At the time of writing only Conditions 22(12) and Condition 10 have been discharged pursuant to Local Authority references R24/0089 and R25/0092 respectively. Further applications for the discharge of Conditions 7, 8, 16, 18, 22, 26, 27, 28, 31, 35 and 40 have been submitted pursuant to Local Authority references R25/0096, R25/0495 and R25/0829 but have not yet been determined.

5.6 Turning then to definition of 'Deliverable' within the NPPF, the site involves major development and benefits from detailed planning permission. With that said, there is no clear evidence that the dwellings will be completed in line with the projected supply outlined at Appendix 2 - List of identified 5YHLS sites for 2025-2030.

5.7 A Freedom of Information Request has been undertaken to review the Developer confirmed trajectory dated 07/11/2024 (see Appendix 1). It is noted that projected supply used in the previous Appendix 2 - List of identified 5YHLS sites for 2024-2029 is based on Marron's trajectory which brought first dwelling completions forward from 2026/27 to 2025/26 and increased the first year completions from 20 to 35 dwelling and thereon from 40 to 45 dwellings per annum (see below). It is also noted that, at the time, Lichfield's report did not include data for smaller sites which is now the case. Reverting to Rugby Borough Councils trajectory (which is itself now out of date) would reduce Rugby Borough Council's 5-year housing land supply in the period 2025-2030 by 70 dwellings.

Year	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post 2031
Trajectory			20	40	40	40	40	30
Our Trajectory		35	45	45	45	40		

5.8 Lichfield's Report sets out that the average planning to delivery period up to first dwelling completion (following approval of detailed consent) for sites of 100-499 dwellings is 3.2 years with the median build-out-rate being 44 dwellings per annum. This is consistent with the CMA Report which sets out that the 'Time to implementable planning approval to start of construction' and the 'Time from start of construction to end of construction' is 3.3 years (0.8 years and 2.5 years respectively).

5.9 The impact of the above is set out in the below table which compares the projected supply in Appendix 2 - List of identified 5YHLS sites for 2025-2030 against the projected supply as calculated in this Report for the same period. It also includes Rugby Borough Councils original projected supply that was superseded by Marrons projected supply. The below table makes the following assumptions:

- First dwelling completions start November 2028 (3.2 years from September 2025 in line with both the Lichfields and CMA estimates)
- The build out rate after the first 35 dwellings in the first year is 44 dwelling per annum in accordance with Lichfields' average.

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply (RBC)	0	35	45	45	40	165
Projected Supply (RBC Original)	0	20	40	40	40	140
Projected Supply (Applicant)	0	0	0	35	44	79
RBC Original Difference	-35	-15	-5	-5	0	-60
Applicant Difference	0	-35	-45	-10	+4	**-86**

5.10 The impact of the above (as set out in the above table) would be to reduce Rugby Borough Council's 5-year housing land supply in the period 2025-2030 by 86 dwellings (or by 60 using Rugby Borough Councils original projected supply).

Cawston Farm 1 (Tritax Symmetry) (parcel 12, plot T2)

5.11 Appendix 2 - List of identified 5YHLS sites for 2025-2030 sets out the below trajectory for Cawston Farm 1 (Tritax Symmetry) (parcel 12, plot T2) over the period 2025-2030:

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply	0	0	20	40	40	**100**

5.12 ‘Residential development of up to 275 dwellings (Use Class C3); provision of open space, outline including means of access into the site (not internal roads) and associated works, with all other matters (relating to access, appearance, landscaping, scale and layout) reserved. Demolition of six silos and buildings referenced A-K.’ was submitted to Rugby Borough Council and validated on 16 May 2019 under Local Authority reference R18/0995.

5.13 Local Authority reference R18/0995 went to Planning Committee on 12 February 2025 where it was resolved that the Chief Officer for Growth and Investment be authorised to grant permission subject to:

1) The conditions and informatives set out in the draft decision notice appended to the report; and

2) Add an additional clause to condition 23 to strengthen the protection of Cawston Spinney during the Construction phase: 23 (15) Measures to ensure that no construction activities, including works, fencing, parking or storage of materials would have a detrimental impact on Brick Yard Spinney, Cawston Spinney or Foxes Covert.

3) The completion of a legal agreement to secure the necessary financial contributions and/or planning obligations as indicatively outlined in the heads of terms within the report; and

4) The Chief Officer for Growth and Investment be given delegated authority to make minor amendments to the conditions and informatives outlined in the draft decision notice; and

5) The Chief Officer for Growth and Investment (in consultation with the Planning Committee Chair) be given delegated authority to add, vary or remove any of the financial contributions and/or planning obligations outlined in the heads of terms within this report.

5.14 At the time of writing the Section 106 Agreement has not been signed to secure the planning obligations outlined within the heads of terms and thus the Decision Notice has not been issued.

5.15 Turning then to the definition of 'Deliverable' within the NPPF, part a) does not apply to this site as it involves major development and does not benefit from detailed planning permission. Turning to part b) the site has been allocated in a development plan and has a resolution to grant outline planning permission. With that said, there is no clear evidence that the dwellings will be completed in line with the projected supply outlines at Appendix 2 - List of identified 5YHLS sites for 2025-2030.

5.16 A Freedom of Information Request has been undertaken to review the Developer confirmed trajectory dated 28/10/2024 (see Appendix 2). This confirms that the projected supply in Appendix 2 - List of identified 5YHLS sites for 2024-2029 was based on outline planning permission being granted in the 2024/25 monitoring year which has not been the case. It is also noted that the Pro Forma for Site Deliverability Assessment states that Lichfield's Report indicates that an average time from grant of outline planning permission on sites of 100-499 dwellings to first dwelling completion is 3.2 years. As detailed below (and at Figure 3.2 of Lichfield's Report), this 3.2 year figure does not include the time taken to obtain detailed planning consent.

5.17 Lichfield's Report sets out that the average time to obtain detailed consent and the average planning to delivery period up to first dwelling completion for sites of 100-499 dwellings is 4.7 years (1.5 years and 3.2 years respectively) with the median build-out-rate being 44 dwellings per annum. This is consistent with the CMA Report which sets out that the time to 'Obtain detailed planning/reserved matters', 'Time to implementable planning approval to start of construction' and the 'Time from start of construction to end of construction' is 3.9 - 4.3 years (0.7 – 1.1 years, 0.8 years and 2.5 years respectively).

5.18 The impact of the above is set out in the below table which compares the projected supply in Appendix 2 - List of identified 5YHLS sites for 2025-2030 against the projected supply as calculated in this Report for the same period. The below table makes the following assumptions:

- The Section 106 Agreement will be signed and the outline planning permission granted by 30 November 2025

- The Reserved Matters application is submitted and granted by 30 November 2026
- First dwelling completions start November 2029 (3 years from the grant of Reserved Matters, being more conservative than both the Lichfields and CMA estimates).
- The build out rate after the first 20 dwellings in the first year is 44 dwelling per annum in accordance with Lichfield's average.

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply (RBC)	0	0	20	40	40	100
Projected Supply (Applicant)	0	0	0	0	20	**20**
Difference	0	0	-20	-40	-20	**-80**

5.19 The impact of the above (as set out in the above table) would be to reduce Rugby Borough Council's 5 year housing land supply in the period 2025-2030 by 80 dwellings.

Cawston Farm 2 (Tritax Symmetry)

5.20 Appendix 2 - List of identified 5YHLS sites for 2025-2030 sets out the below trajectory for Cawston Farm 2 (Tritax Symmetry) over the period 2025-2030.

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply	0	0	0	40	40	**80**

5.21 ‘Outline application for: Residential development of up to 350 Dwellings (Use Class C3); provision of open space, including means of access into the site (not internal roads) and associated works, with all other matters (relating to access, appearance, landscaping, scale and layout) reserved.’ was submitted to Rugby Borough Council and validated on 26 August 2022 under Local Authority reference R22/0853.

5.22 Turning then to definition of ‘Deliverable’ within the NPPF, part a) does not apply to this site as it involves major development and does not benefit from detailed planning permission. Turning to part b) the site has been allocated in a development plan. With that said, there is no clear evidence that the dwellings will be completed in line with the projected supply outlined at Appendix 2 - List of identified 5YHLS sites for 2025-2030.

5.23 Local Authority reference R22/0853 is Phase II of the residential development at Cawston Farm and follows the resolution to grant on Phase I pursuant to Local Authority reference R18/0995 discussed above. As Phase II of the Cawston Farm development, it is predicated on the commencement of works on Phase I. Phase I proceeding Phase II is required to ensure connection of the Phase I site with the A45/M45 roundabout via the Potford Dam Link Road in accordance with both Policy DS9: South West Rugby Spine Network Road and The Infrastructure Delivery Plan. This is recognised within Appendix 2 - List of identified 5YHLS sites for 2025-2030 which in turn projects the first completions the year following Cawston Farm 1 (Tritax Symmetry).

5.24 As with Phase I above, Lichfield’s Report sets out that the average time to obtain detailed consent and the average planning to delivery period up to first dwelling completion for sites of 100-499 dwellings is 4.7 years (1.5 years and 3.2 years respectively) with the median build-out-rate being 44 dwellings per annum. This is consistent with the CMA Report which sets out that the time to ‘Obtain detailed planning/reserved matters’, ‘Time to implementable planning approval to start of construction’ and the ‘Time from start of construction to end of construction’ is 3.9 - 4.3 years (0.7 – 1.1 years, 0.8 years and 2.5 years respectively).

5.25 The impact of the above is set out in the below table which compares the projected supply in Appendix 2 - List of identified 5YHLS sites for 2025-2030 (for the period 2025-2030) against the projected supply as calculated in this Report for the same period. The below table makes the following assumptions:

- The first dwellings will be completed in the year following the first completions at Cawston Farm 1 (Tritax Symmetry) (see comments above).

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply (RBC)	0	0	0	40	40	80
Projected Supply (Applicant)	0	0	0	0	0	0
Difference	0	0	0	-40	-40	**-80**

5.26 The impact of the above (as set out in the above table) would be to reduce Rugby Borough Council's 5 year housing land supply in the period 2025-2030 by 80 dwellings.

Land South West of Cawston Lane (Catesby Estates)

5.27 Appendix 2 - List of identified 5YHLS sites for 2025-2030 sets out the below trajectory for Land South West of Cawston Lane (Catesby Estates) over the period 2025-2030.

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply	0	0	0	25	50	**75**

5.28 ‘EIA scoping request: Outline up to 550 dwellings & associated works’ was submitted and validated by Rugby Borough Council on 12 July 2022 pursuant to Local Authority reference R22/0707. The EIA Scoping opinion was issued on 20 August 2022.

5.29 ‘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).’ was validated by Rugby Borough Council on 02 July 2025 pursuant to LPA reference R25/0487.

5.30 Turning then to definition of ‘Deliverable’ within the NPPF, part a) does not apply to this site as it involves major development and does not benefit from detailed planning permission. Turning to part b) the site has been allocated in a development plan. With that said, there is no clear evidence that the dwellings will be completed in line with the projected supply outlined at Appendix 2 - List of identified 5YHLS sites for 2025-2030.

5.31 Lichfield’s Report sets out that the median average timeframes from validation of the first application to completion of the first dwelling is 6 years (2.8 years for the planning approval period and 3.2 years for the planning to delivery period) for sites between 100 and 499 dwellings. This is consistent with the CMA Report which sets out that the overall development timeline is 6.3 to 6.6 years (including Application to obtain outline planning permission, obtain detailed planning/reserved matters, time to implementable planning approval to start of construction, time from start of construction to end of construction).

5.32 The impact of the above is set out in the below table which compares the projected supply in Appendix 2 - List of identified 5YHLS sites for 2025-2030 against the projected supply as calculated in this Report for the same period. The below table makes the following assumptions:

- An outline application is granted by November 2026 (not a resolution to grant subject to a Section 106 Agreement)
- Reserved matters application is granted by May 2028
- The first dwellings will be completed July 2031

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply (RBC)	0	0	0	25	50	75
Projected Supply (Applicant)	0	0	0	0	0	0
Difference	0	0	0	-25	-50	**-75**

5.33 The impact of the above (as set out in the above table) would be to reduce Rugby Borough Council's 5-year housing land supply in the period 2025-2030 by 75 dwellings.

Land to the North East of Cawston Lane & Land to the East of Alwyn Road (Taylor Wimpey)

5.34 Appendix 2 - List of identified 5YHLS sites for 2025-2030 sets out the below trajectory for Land to the North East of Cawston Lane & Land to the East of Alwyn Road (Taylor Wimpey) over the period 2025-2030.

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply	0	0	0	20	52	**72**

5.35 'Environmental Impact Assessment Scoping Opinion - Outline planning application for up to 900 new homes and associated roads, drainage, open space, play space and associated infrastructure with all matters reserved except access' was submitted and validated by Rugby Borough Council on 15 November 2022 pursuant to Local Authority reference R22/1236. The EIA Scoping opinion was issued on 20 December 2022.

5.36 The developers planning agent RPS have confirmed on 12 May 2025 that an outline planning application had been submitted and was awaiting validation by Rugby Borough Council. RPS have proposed the following timeline as part of the submitted application:

- March 2025 Outline Planning Application Submitted
- Summer 2025 Outline Planning Permission Granted
- Autumn 2026 1st Phase Reserved Matters Application Submitted/Approved
- Winter 2026 On-site Construction/Infrastructure Delivery
- 2026 to 2038 Development, Delivery, and Completion

5.37 RPS have added the following in respect of the proposed trajectory "*This calculation assumes a 10.52 year build-out period by delivering 67 dwellings per annum, excluding the lead-in time. The 67 dpa figure is based on the mean dpa in Table 4.2 of the Start to Finish document. There is a bit of flex based on the delivery of enabling infrastructure from Homes England, particularly the Homestead Link Road. Still, given that the Homestead Link Road is scheduled to start in September, we are reasonably comfortable with the above trajectory.*

Therefore, we would currently concur with the Council's indicative estimate of the supply position of 20-30 dwellings in 29-30 as achievable.

Given the timeline above it would be likely that RBC will revise their anticipated trajectory for our site following review of the submitted application as completions on part of the site in late 2027 / early 2028 would appear feasible."

5.38 Following RPS' comments 'An outline application 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.' was validated on 21 July 2025 pursuant to LPA reference R25/0407.

5.39 RPS' trajectory is considered to be overly ambitious and not achievable when compared against Lichfield's and the CMAs estimates. Lichfield's Report sets out that the median average timeframes from validation of the first application to completion of the first dwelling is 4.9 years (3.4 years for the planning approval period and 1.5 years for the planning to delivery period) for sites between 500 and 999 dwellings. This is consistent with the CMA Report which sets out that the overall development timeline is 6.3 to 6.6 years (including Application to obtain outline planning permission, obtain detailed planning/reserved matters, time to implementable planning approval to start of construction, time from start of construction to end of construction).

5.40 The impact of the above is set out in the below table which compares the projected supply in Appendix 2 - List of identified 5YHLS sites for 2025-2030 against the projected supply as calculated in this Report for the same period. The below table makes the assumptions:

- An outline application is granted by May 2027 (not a resolution to grant subject to a Section 106 Agreement)
- Reserved matters application is granted by December 2028
- The first dwellings will be completed June 2030

Year	**2025-26**	**2026-27**	**2027-28**	**2028-29**	**2029-30**	**Total**
Projected Supply (RBC)	0	0	0	20	52	72
Projected Supply (Applicant)	0	0	0	0	0	0
Difference	0	0	0	-20	-52	**-73**

5.41 The impact of the above (as set out in the above table) would be to result in no change to Rugby Borough Council's 5 year housing land supply in the period 2025-2030.

Taylor Wimpey remaining land

5.42 Appendix 2 - List of identified 5YHLS sites for 2025-2030 sets out the below trajectory for the Taylor Wimpey remaining land over the period 2025-2030.

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply	0	0	0	0	20	**20**

5.43 Turning then to the definition of 'Deliverable' within the NPPF, part a) does not apply to this site as it involves major development and does not benefit from detailed planning permission. Turning to part b) the site has been allocated in a development plan. With that said, there is no clear evidence that the dwellings will be completed in line with the projected supply outlines at Appendix 2 - List of identified 5YHLS sites for 2025-2030.

5.44 At the time of writing, the Applicants have not submitted an outline or full planning application.

5.45 Lichfield's Report sets out at Figure 3.1 that the median average timeframes from validation of the first application to completion of the first dwelling is 3.8 years (1.5 years and 2.3 years for planning approval period and planning to delivery period respectively). Whilst this would allow for first dwelling completions in 2029 it is reliant on their being clear evidence that a planning application has been submitted before the end of 2025. As such, it is not considered that the Taylor Wimpey remaining land meets the definition of developable in the NPPF.

5.46 The impact of the above is set out in the below table which compares the projected supply in Appendix 2 - List of identified 5YHLS sites for 2025-2030 against the projected supply as calculated in this Report for the same period. The below table makes the following assumptions:

- A planning application has not been submitted

- Once submitted, first dwelling completions would be anticipated in 3.8 years. Once this application is submitted, it will be a point of common ground with the Local Authority that this site is deliverable within 5 years.

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply (RBC)	0	0	0	0	20	20
Projected Supply (Applicant)	0	0	0	0	0	0
Difference	0	0	0	0	-20	**-20**

5.47 The impact of the above (as set out in the above table) would be to reduce Rugby Borough Council's 5-year housing land supply in the period 2025-2030 by 20 dwellings. As noted above, once this application is submitted, it will be a point of common ground with the Local Authority that this site is deliverable within 5 years.

Eden Park Phases R5, R6, and R7 (Bloor Homes)

5.48 Appendix 2 - List of identified 5YHLS sites for 2025-2030 sets out the below trajectory for Eden Park Phases R5, R6, and R7 (Bloor Homes) over the period 2025-2030.

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply	0	10	55	55	55	**175**

5.49 ‘Outline application for residential development (up to 1300 units); employment development (up to 36ha in total, B2 – General Industrial & B8 – Storage & Distribution); community facilities (D1 – Non-residential Institutions) including primary school, nursery and health facility, retail premises (A1 – Retail, A3 – Food & Drink, A4 – Drinking Establishments & A5 - Hot Food Takeaway); open space; associated infrastructure and works including details of access into site (including alterations to highway and existing roundabouts). Demolition of existing buildings.’ was submitted to and validated by Rugby Borough Council on 17 August 2010 pursuant to Local Authority reference R10/1272. Outline planning permission was subsequently granted planning permission on 20 August 2013.

5.50 ‘Erection of 550 dwellings for Phases R5, R6 and R7 with associated play area, and sports pitches. (Approval of Reserved Matters: Access, Appearance, Landscaping, Layout and Scale in relation to outline planning permission R10/1272).’ Was submitted to and validated by Rugby Borough Council on 14 June 2023 pursuant to Local Authority reference R23/0453. Reserved matters was granted planning permission on 15 January 2025. It should be noted that according to the Bloor Homes website (see below) this application was anticipated to go to planning committee in May 2023 and is therefore 1 year and 8 months behind the original schedule.

5.51 Local Authority reference R23/0453 contains one pre-development condition, Condition 2 (Materials). ‘Details of condition 2 R23/0453 & Condition 9 R10/1272 (Materials)’ was submitted to and validated by Rugby Borough Council on 25 March 2025 pursuant to Local Authority reference R25/0304. Condition 2 was subsequently discharged on 08 April 2025.

5.52 ‘Non material amendment to R23/0453 (erection of 550 dwellings): Plots 1-2 swapped with plot 19. Plots 3 & 21 reduced in size.’ was submitted to and validated by Rugby Borough Council on 27 March 2025 pursuant to Local Authority reference R25/0323. Local Authority reference R25/0323 was subsequently approved on 01 April 2025.

5.53 Lichfield's Report sets out that the average planning to delivery period up to first dwelling completion for sites between 500 and 999 dwellings is 1.5 years. The CMA Report does not set out an average period between the grant of reserved matters and first dwelling completions however it does establish that the time to implementable planning approval to start of construction is 0.8 years.

5.54 As shown in the below photographs dated 04 June, no construction work has started on-site.









5.55 The impact of the above is set out in the below table which compares the projected supply in Appendix 2 - List of identified 5YHLS sites for 2025-2030 against the projected supply as calculated in this Report for the same period. The below table makes the following assumptions:

- Start of construction on site in February 2026 (10 months/0.8 years post-discharge of Condition 2)
- First dwelling completions October 2027 (1 Year and 6 Months/1.5 years post-discharge of Condition 2)

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply (RBC)	0	10	55	55	55	175
Projected Supply (Applicant)	0	0	10	55	55	120
Difference	0	-10	-45	0	0	**-55**

6.35 The impact of the above (as set out in the above table) would be to reduce Rugby Borough Council's 5 year housing land supply in the period 2025-2030 by 55 dwellings.

Remainder of Houlton allocation

5.56 Appendix 2 - List of identified 5YHLS sites for 2025-2030 sets out the below trajectory for Remainder of Houlton allocation over the period 2025-2030.

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply	0	80	175	225	200	**680**

5.57 ‘Outline application for an urban extension to Rugby for up to 6,200 dwellings together with up to 12,000sq.m retail (A1), up to 3,500sq.m financial services (A2) and restaurants (A3 - A5), up to 3,500sq.m for a hotel (C1), up to 2,900sq.m of community uses (D1), up to 3,100sq.m assembly and leisure uses (D2), 31 hectares (up to 106,000sq.m) of commercial and employment space (B1, B2 and B8), and ancillary facilities; a mixed use district centre and 3 subsidiary local centres including retention and re-use of the existing buildings known as 'C' Station (Grade II listed), 'A' Station and some existing agricultural buildings; a secondary school and 3 primary schools; public art; green infrastructure including formal and informal open space and amenity space; retention of existing hedgerows, areas of ridge and furrow and grassland; new woodland areas, allotments and areas for food production, wildlife corridors; supporting infrastructure (comprising utilities including gas, electricity, water, sewerage, telecommunications, and diversions as necessary); sustainable drainage systems including ponds, lakes and water courses; a link road connecting the development to Butlers Leap, estate roads and connections to the surrounding highway, cycleway and pedestrian network; ground remodelling; any necessary demolition and any ground works associated with the removal of any residual copper matting, with all matters reserved for future determination except the three highway junctions on the A428, the two junctions on the A5 and the link road junctions at Butlers Leap and Hillmorton Lane.’ was submitted to and validated by Rugby Council on 01 April 2011 pursuant to Local Authority reference R11/0699. Local Authority reference R11/0699 was subsequently granted planning permission on 21 May 2014.

5.58 ‘Outline application for an urban extension to Rugby for up to 6,200 dwellings together with up to 12,000sq.m retail (A1), up to 3,500sq.m financial services (A2) and restaurants (A3 - A5), up to 3,500sq.m for a hotel (C1), up to 2,900sq.m of community uses (D1), up to 3,100sq.m assembly and leisure uses (D2), 31 hectares (up to 106,000sq.m) of commercial and employment space (B1, B2 and B8), and ancillary facilities; a mixed use district centre and 3 subsidiary local centres including retention and re-use of the existing buildings known as 'C' Station (Grade II listed), 'A' Station and some existing agricultural buildings; a secondary school and 3 primary schools; public art; green infrastructure including formal and informal open space and amenity space; retention of existing hedgerows, areas of ridge and furrow and grassland; new woodland areas, allotments and areas for food production, wildlife corridors; supporting infrastructure (comprising utilities including gas, electricity, water, sewerage, telecommunications, and diversions as necessary); sustainable drainage systems including ponds, lakes and water courses; a link road connecting the development to Butlers Leap, estate roads and connections to the surrounding highway, cycleway and pedestrian network; ground remodelling; any necessary demolition and any ground works associated with the removal of any residual copper matting, with all matters reserved for future determination except the three highway junctions on the A428, the two junctions on the A5 and the link road junctions at Butlers Leap and Hillmorton Lane - Variation of conditions 5,6,7,63 64 and 81 of the outline planning permission R11/0699 dated 21/05/2014 to cover minor material changes to the approved Parameter Plans and Development Specification and to reflect approvals already granted pursuant to the outline planning permission and the latest land control position; removal of condition 73 and consequent renumbering of conditions 74 - 81 inclusive.’ was submitted to and validated by Rugby Council on 09 January 2017 pursuant to Local Authority reference R17/0022. Local Authority reference R17/0022 was subsequently granted planning permission on 28 Jun 2017.

5.59 The below table summarises the reserved matters applications that have been submitted and granted to date:

Key Phase	Local Authority Reference	Quantum	Notes
1	R15/1702	88	Validated 04 Jan 2016, granted 11 Jul 2017
1	R18/0544	380	Supersedes R15/1702. Validated 20 Mar 2018, granted 20 Jul 2018
1	R20/0538	2	Validated 17 Jul 2020, granted 18 Feb 2021
2(A)	R21/1099	31	Validated 18 Mar 2022, granted 12 Sep 2022
3(A and B)	R18/1177	248	Validated 17 Jul 2018, granted 21 Dec 2018
3(A and B)	R19/1375	13	Part supersedes R18/1177. Validated 17 Jan 2020, granted 07 Sep 2020
3(A and B)	R20/0709	15	Part supersedes R18/1177. Validated 13 Oct 2020, granted 06 Jan 2021
3(A and B)	R21/0739	13	Part supersedes R18/1177. Validated 03 Jul 2021, granted 11 Mar 2022
3 (C and F)	R20/0681	146	Validated 19 Aug 2020, granted 01 Apr 2021
3 (D)	R21/0873	147	Validated 13 Aug 2021, granted 11 Apr 2022

5.60 Turning then to the definition of 'Deliverable' within the NPPF, part a) does not apply to this site as it involves major development and does not benefit from detailed planning permission. Turning to part b) the site has been allocated in a development plan and has outline planning permission. With that said, there is no clear evidence that the dwellings will be completed in line with the projected supply outlines at Appendix 2 - List of identified 5YHLS sites for 2025-2030.

5.61 As of 01 April 2024, there were 4083 remaining dwellings from Local Authority reference R11/0699 and R17/0022 without detailed planning permission. Since 01 April 2024 a reserved matters application has been submitted for the 'Erection of 216 dwellings and associated works and development including access roads, parking and garages (application for approval of reserved matters relating to access, appearance, landscaping, layout and scale pursuant to outline planning permission R17/0022)' pursuant to LPA reference R25/0549 which was validated by Rugby Borough Council on 10 July 2025.

5.62 Lichfields Report sets out that the average time to obtain detailed consent and the average planning to delivery period up to first dwelling completion is between 3 and 4.7 years dependent on the quantum of development (1.5-2.4 years for detailed consent and 1.3 to 3.2 years planning to delivery period up to first dwelling completion). This is consistent with the CMA Report which sets out that the overall development timeline between 4 and 4.4 years (0.7-1.1 years to obtain detailed planning/reserved matters, 0.8 years' from implementable planning approval to start of construction and 2.5 years from start of construction to end of construction). 0.7 years (8 months) to obtain detailed planning/reserved matters would be consistent with the previous two reserved matters applications, Local Authority references R20/0681 R21/0873 which both took 8 months to be determined.

5.63 The impact of the above is set out in the below table which compares the projected supply in Appendix 2 - List of identified 5YHLS sites for 2025-2030 (for the period 2025-2030) against the projected supply as calculated in this Report for the same period. The below table makes the following assumptions:

- Reserved matters on the next applications will be granted February 2026 (8 months from the validation of R25/0549 which itself only includes 216 of the remaining 4083 dwellings).
- First dwelling completions February 2028 (2 years planning to delivery period up to first dwelling completion to account for variation in quantum of reserved matters applications).
- Delivery rates are the same as the projected supply in Appendix 2 - List of identified 5YHLS sites for 2025-2030.

Year	2025-26	2026-27	2027-28	2028-29	2029-30	Total
Projected Supply (RBC)	0	80	175	225	200	680
Projected Supply (Applicant)	0	0	0	80	175	255
Difference	0	-80	-175	-145	-25	**-425**

6.35 The impact of the above (as set out in the above table) would be to reduce Rugby Borough Council's 5 year housing land supply in the period 2025-2030 by 425 dwellings.

6.0 5 YEAR HOUSING SUPPLY AS AT 01 NOVEMBER 2025

6.1 Based on analysis of deliverable sites for the five-year period 01 November 2025 to 31 October 2030, we consider that Rugby Borough Council can only identify a housing land supply of 2.85 years against their local housing need (equating to a shortfall of 1,435 dwellings). These calculations are presented in full in the below table:

	RBC Position	Applicant's Position
Local Housing Need	636	636
5 Year Requirement (with 5% Buffer)	3,339	3,339
Projected Supply Appendix 2 - List of identified 5YHLS sites for 2025-2030	2,797	2,797 (Before Assessment of Sites)
Established Shortfall	542	542 (Before Assessment of Sites)
Established 5 Year Housing Supply	4.16 Years	4.16 years (Before Assessment of Sites)
Assessed Sites		
Coventry Road (Miller Homes)		-86
Cawston Farm 1 (Tritax Symmetry)		-80
Cawston Farm 2 (Tritax Symmetry)		-80
Land South West of Cawston Lane (Catesby Estates)		-75

Land to the North East of Cawston Lane & Land to the East of Alwyn Road (Taylor Wimpey)		-72
Taylor Wimpey remaining land		-20
Eden Park Phases R5, R6, and R7 (Bloor Homes)		-55
Remainder of Houlton allocation		-425
Projected Supply (2025-2030)	2,797	1,904
Shortfall Position	**542**	**1,435**
5 Year Housing Supply	**4.16 years**	**2.85 years**

Appendix 1: Pro Forma for Site Deliverability Assessment Land South of Coventry Road (210 dwellings). South West Rugby Development Parcel 6

Appendix 2: Pro Forma for Site Deliverability Assessment Cawston Spinney (275 dwellings). South West Rugby Development Parcel 12 Plot T2. Tritax Symmetry

Pro Forma for Site Deliverability Assessment

Site Information
Site name: Land South of Coventry Road (210 dwellings). South West Rugby Development Parcel 6.
Ward/Parish: Dunsmore

Planning Status

- This site is part of the South West Rugby Local Plan allocation as set out in Local Plan Policy DS3.
- Local Plan Policies DS8 and DS9 set out the requirements for the allocation.
- A South West Rugby Masterplan SPD includes requirements for the site and information to assist applicants in submitting applications which can be assessed more quickly. The document should also assist in the negotiation of planning contributions to ensure these are dealt with and agreed in a timely manner.
- Outline application R18/0936 for 210 dwellings was submitted on 25/03/2019 by Marrons and granted permission on 23 December 2022.

Contact Details

[redacted]

Future Delivery Rates and Commentary
This site is assessed against part b) of the NPPF definition of deliverable as it is a site allocated in a development plan and is a major site without detailed planning permission. As such it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

This site is deemed to be deliverable for the following reasons:

- Outline planning permission as granted on 23 December 2022.

- Lichfields' *Start to Finish* (2020) research indicates an average time of 3.1 years from grant of outline planning permission on sites of 500-999 dwellings to first completions on site. Data on smaller sites is not provided, but given Coventry Road forms part of a larger site, the Lichfield data is considered appropriate. As outline planning permission was granted in the 2022/2023 monitoring year, this would indicate first completions in 2026/27 monitoring year – Marrons responded in 2023 'I note there is reference to Lichfield's Start to Finish Report in suggesting 3.1 years from grant of outline to first completion, but this relates to sites of between 500 and 999 dwellings and of course this planning permission is for a lower number of units. However, we consider that completions commencing from midway through 2026/27 at a rate of 40dpa is reasonable in principle.'

- An annual completions number of 40dpa is considered appropriate for a site of this size, consistent with the approach applied in RBC 5yhls statements. Applying these assumptions gives the trajectory set out in Table two below which is unchanged from last year.

Trajectory (for 2024-2029)

Year	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post 2031
Trajectory			20	40	40	40	40	30
Our Trajectory		35	45	45	45	40		

Pro Forma for Site Deliverability Assessment

Site Information
Site name: Cawston Spinney (275 dwellings). South West Rugby Development Parcel 12 Plot T2. Tritax Symmetry
Ward/Parish: Dunsmore

Planning Status

- This site is part of the South West Rugby Local Plan allocation as set out in Local Plan Policy DS3.
- Local Plan Policies DS8 and DS9 set out the requirements for the allocation.
- A South West Rugby Masterplan SPD includes requirements for the site and information to assist applicants in submitting applications which can be assessed more quickly. The document should also assist in the negotiation of planning contributions to ensure these are dealt with and agreed in a timely manner.
- Outline application R18/0995 for 275 dwellings was submitted on 16/05/2019 and is currently under consideration.
- The site is Greenfield land on the edge of Rugby Urban Area. As this is a Local Plan allocation there has been site assessment work completed both by developers and by the LPA. The findings were such that the Local Plan Inspector was satisfied to include this site as an allocation. Assessment work includes highways modelling and a sustainability appraisal. Site assessment documents produced to support the Local Plan can be found on the Rugby Borough Council website in the Local Plan evidence base.

Contact Details

[redacted]

Future Delivery Rates and Commentary
This site is assessed against part b) of the NPPF definition of deliverable as it is a site allocated in a development plan and is a major site without detailed planning permission. As such it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

This site is deemed to be deliverable for the following reasons:

- Lichfields' *Start to Finish* (2024) research indicates an average time of 3.2 years from grant of outline planning permission on sites of 100-499 dwellings to first completions on site. If outline planning permission is granted in the 2024/2025 monitoring year, this would indicate first completions in 2027/28 monitoring year.

- An annual completions number of 50dpa is considered appropriate for a site of this size, consistent with the approach applied in RBC 5yhls statements. Applying these assumptions gives the trajectory set out in Table two below.

- With regard to the above factors the trajectory is adjusted as set out in Table Two below.

Trajectory 2024-2029

Year	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Post 2031
Trajectory				20	50	50	50	105

Summary of Rep 324: John Tarrant

N.B. This is a summary produced by a planning officer. It was not submitted by the consultee.

S2 is unsound because:

- Affordable housing need has been incorrectly calculated for 2025-2043 and not the plan period of 2025-2042. It should be 882 divided by 17 not 18, which gives an annual net need of 478 affordable homes per annum, not 474;
- Insufficient affordable housing is likely to be delivered by the proposed allocations;
- A 8.5% housing supply buffer will not provide sufficient flexibility to continually demonstrate a five-year housing land supply;
- There is not proportionate evidence to justify an assumption of 50 windfall dwellings per year; and
- The plan will not look ahead over a minimum period of 15 years, even if the LDS is strictly adhered to, which is unlikely as it is overly ambitious.

To make S2 sound:

- Housing provision should be increased by 567 dwellings over the plan period;
- The supply buffer should be increased to at least 15.8%;
- Assumed small site windfalls should be reduced from 840 to 765 dwellings;
- The plan period should be extended to 2043/44;
- An additional strategic policy should be added to ensure suitable homes are allocated within Neighbourhood Plans; and
- Additional sites should be allocated under policy S6 to account for these changes.

S6 is unsound because:

- Exceptional circumstances for Green Belt release have not been adequately justified and appropriate non-Green Belt opportunities (such as those to the south of Rugby) have not been exhausted;
- Development of site 253 will result in Rugby and Long Lawford merging, fundamentally weakening the wider Green Belt;
- Development of sites 315 and 337 in Brinklow will have an unacceptable impact on designated and undesignated heritage assets;
- Site 87 in Newton is not in a sustainable location and a safe walking route to schools will not be provided; and
- Sites 309 and 358 in Wolvey are not in sustainable locations. Their development would place unacceptable pressure on social care surfaces, lead to school place shortfalls within the plan period, and result in an overreliance on the private car for access to services.

To make S6 sound:

- Sites 253 (Long Lawford), 315 and 337 (Brinklow), 87 (Newton), and 309 and 358 (Wolvey) should be removed as allocations under policy S6;
- Alternative allocations in sustainable locations should be made, including site 52, Ashlawn House, which is subject to a live planning application for 90 dwellings (R25/1041). The justification for discounting this site as given in the plan's evidence base is poorly reasoned.

EN3 is unsound because:

- The 2025 study of the Rainsbrook provides a poor analysis of landscape value, does not identify land parcels or units, fails to cross-reference LSAs of individual sites, and has a flawed methodology that is inconsistent with Natural England Guidance. Therefore the policy is not based on proportionate evidence;
- Neither the policy nor the study clarify whether the Rainsbrook Valley is to be designated as a valued landscape, which is of importance because an inspector has previously concluded that the landscape would not qualify as a valued landscape, and because the concept is being replaced under the new NPPF; and
- The 2025 study's analysis of Ashlawn House in particular is flawed, and should be considered to have at most medium sensitivity, rather than high sensitivity.

To make EN3 sound:

- The policy area should be modified on the policies map to only include areas of high landscape sensitivity, informed by a modified LSA which assesses defined land parcels.
- The wording of policy EN3 should be modified to clearly specify whether the Rainsbrook Valley is a valued landscape.