

Sustainability Appraisal (SA) of the Rugby Borough Local Plan

Interim SA Report

March 2025

Quality information

Prepared by	Checked by	Approved by
Mark Fessey Associate Director	Ian McCluskey Associate Director	Nick Chisholm-Batten Technical Director

Prepared for:

Rugby Borough Council

Prepared by:

AECOM Limited
Aldgate Tower
2 Leman Street
London E1 8FA
United Kingdom
aecom.com

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Non-technical Summary

The aim of this report is to appraise the current Draft Rugby Local Plan alongside “reasonable alternatives”.

The report is structured in order to explain a story over time, specifically:

- Part 1 – deals with reasonable alternatives (RAs), specifically:
 - Section 4 – introduces the concept of RAs.
 - Section 5 – presents the outcomes of a process to define RAs.
 - Section 6 – appraises RAs.
 - Section 7 – presents Officers’ response to the appraisal.
- Part 2 – presents an appraisal of the Draft Local Plan.
- Part 3 – discusses next steps.

Focusing on Section 6, this presents an appraisal of two sets of RAs in the form of ‘growth scenarios’, defined as alternative approaches to development in order to provide for needs alongside supporting wider plan objectives.

The first set of scenarios appraised deals with housing and the second set employment land.

Each appraisal involves exploring the merits of the growth scenarios under the ‘SA framework’, which is discussed in Section 3 and essentially comprises a list of sustainability topics and associated objectives.

Both appraisals show the emerging preferred approach to perform well but serve to highlight that there are certain arguments to be made for supporting an alternative approach.

This is acknowledged by Officers’ in Section 7 of the report, but in each case the preferred growth scenario / preferred approach is considered to represent sustainable development on balance.

With regards to the draft plan appraisal presented in Part 2, the conclusion reached is as follows:

The appraisal predicts: **significant positive effects** under two headings (economy/employment and homes); **moderate or uncertain positive effects** under two headings (climate change mitigation and communities) and **moderate or uncertain negative effects** under two headings (historic environment and landscape). Neutral effects are predicted under the remaining headings (which is not to suggest that there are not certain tensions with sustainability objectives to explore further). The appraisal does not predict any significant negative effects.

Part 3 is then presents a short discussion of next steps, and also briefly looks ahead to monitoring plan implantation. The key point to note is that subsequent to the current consultation further work will be undertaken to explore issues and options and further formal consideration will be given to reasonable alternatives. Subsequently the final draft (‘proposed submission’) version of the Local Plan will be prepared for publication under Regulation 19 of the Local Planning Regulations (this current consultation is held under Regulation 18). The next step (assuming the plan is still deemed to be ‘sound’ in light of representations received) will then be to submit the Local Plan to the Government who will ask the Planning Inspectorate to Examine the Local Plan.

1. Introduction

1.1. Background

- 1.1.1. AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Rugby Borough Local Plan that is being prepared by Rugby Borough Council.
- 1.1.2. Once adopted, the plan will set a strategy for growth and change up to 2045, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3. SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans.¹

1.2. SA explained

- 1.2.1. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations').
- 1.2.2. In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that presents an appraisal of "the plan and reasonable alternatives" with a particular focus on appraising "significant effects" (Regulation 12(2)).
- 1.2.3. More specifically, the SA Report must answer the following **three questions**:
 - What has Plan-making / SA involved **up to this point**?
 - Including appraisal of reasonable alternatives.
 - What are the SA findings **at this stage**?
 - i.e. in relation to the draft plan.
 - What are the **next steps**?
- 1.2.4. The report must then be taken into account, alongside consultation responses, when finalising the plan.

1.3. This Interim SA Report

- 1.3.1. The Council is currently consulting on an early draft plan under Regulation 18 of the Local Planning Regulations, with the intention to subsequently consult on the final draft ('proposed submission') version under Regulation 19 in early 2026. As such, this is not the formal SA Report but an 'Interim' SA Report.

Structure of this report

- 1.3.2. This Interim SA Report aims to present all of the information required of the SA Report and so is structured in **three parts** in order to answer each of the questions set out above in turn, specifically:
 - Part 1 – explains work to date including work to explore reasonable alternatives.
 - Part 2 – presents an appraisal of the draft plan as currently published for consultation.
 - Part 3 – discusses next steps (Regulation 19, submission, examination, adoption, monitoring).
- 1.3.3. Ahead of Part 1, there is a need for two further introductory sections:
 - Section 2 – introduces the plan scope.
 - Section 3 – introduces the SA scope.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2024). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

2. The plan scope

2.1. Introduction

- 2.1.1. The aim here is to briefly introduce the context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion of key issues elsewhere in the report); the plan period; and the objectives that are in place to guide plan preparation.

2.2. Context to plan preparation

- 2.2.1. Rugby Borough Council (RBC) began preparing a new Local Plan in 2022, following adoption of the current Local Plan in 2019 and in the context of a requirement to review local plans every five years. An 'Issues and Options' consultation was held in **2023**, and a consultation summary is now available.
- 2.2.2. Work in 2023 was undertaken in the context of the 2021 NPPF and a draft new NPPF that was then adopted in December 2023. The current Government then adopted a new NPPF in December **2024**.
- 2.2.3. Central to both the previous and new versions of the NPPF is a requirement for authorities to take a positive approach to development, with an up-to-date local plan that provides for development needs, including Local Housing Need (LHN), as far as is consistent with sustainable development.
- 2.2.4. The Borough's **LHN** is understood on the basis of the Government's standard method, which previously generated a figure of 525 dwellings per annum (dpa) and now – post December 2024 – generates a figure of 618 dpa. This is a modest increase compared to some other neighbouring areas, although Coventry sees a reduced LHN under the new method.
- 2.2.5. Under the new NPPF there remains flexibility to evidence a **housing requirement** set below LHN, such that unmet need is generated, but there is a new emphasis on local plans providing for housing need in full, and also on collaborating with neighbouring authorities in respect of any unmet need. Rugby Borough can provide for its LHN in full, recognising that delivery has averaged above 1,000 dpa over recent years, and unmet need from elsewhere is a matter for ongoing consideration.
- 2.2.6. However, perhaps more significant than providing for housing needs is the matter of providing for needs in respect of **employment land**, which are very significant, with the residual need figure – after having accounted for the existing pipeline of committed sites – potentially in excess of 200 ha. Additionally, Coventry City Council has identified unmet need for 45ha of employment land. Also, there is an urgency, in that ahead of a new Local Plan that provides for needs there is a risk of not being able to defend against speculative applications and, in turn, poorly located / uncoordinated growth.
- 2.2.7. To summarise the discussion so far, there is: A) 'top down' pressure to adopt a Local Plan given that the adopted Local Plan dates from 2019 and looks ahead only to 2031, whilst the NPPF expects plans to be reviewed every five years and look ahead 15 years (including in terms of providing for development needs); and B) 'bottom up' pressure in the sense of a need to ensure that growth comes forward in a plan-led way, i.e. such that the Borough can avoid potentially problematic 'planning by appeal'.
- 2.2.8. Finally, there is a need to adopt a Local Plan that delivers on **wide-ranging objectives** regardless of pressure from central government or concerns about avoiding planning by appeal. For example:
- Providing for housing need is not only of great importance in-and-of itself, but also due to wide-ranging secondary benefits, for example in terms of affordable housing and supporting the economy.
 - Plan-led housing growth creates an opportunity to strategically target infrastructure investment such that the benefits of growth are realised in a way that far exceeds what can otherwise be achieved.
 - A local plan is an opportunity to consider development viability in a strategic way, such that a considered approach can be taken to policy 'asks' including housing mix, affordable housing, net zero development, biodiversity net gain, space standards, accessibility standards and more.
 - The Local Plan is a key opportunity to ensure a strategic approach in respect of a range of other key issues, including providing for Gypsy and Traveller accommodation needs (which are significant), town centre regeneration (including accounted for changes to permitted development rights), and the design of new developments (including factoring in matters relating to use mix, housing mix and density). These were all matters that were a focus of the Issues and Options consultation (2023).

2.3. The plan area

- 2.3.1. The Borough of Rugby is located within the County of Warwickshire, at the eastern edge of the West Midlands, bordering the counties of Northamptonshire and Leicestershire within the East Midlands.
- 2.3.2. Around two thirds of the Borough's population lives within the town of Rugby, with the other settlements firmly classified as villages (the largest have a population of ~ 3,000 and, for example, none support a secondary school). Coventry is then located adjacent to the west and is a major sub-regional centre in terms of employment, community facilities (e.g. a hospital), retail and leisure. The north of the Borough then links closely to the (closely linked) towns of Nuneaton (Warwickshire) and Hinkley (Leicestershire). It should be noted that the intention is for Warwickshire to become a Unitary Authority under local government reorganisation (a requirement under the English Devolution White Paper, 2024).
- 2.3.3. The Borough is very well-connected in transport terms, most notably by road but also by rail. Three motorways intersect the Borough, plus the M1 runs near adjacent to the east. There is good motorway connectivity to Coventry to the west (and Birmingham beyond), Leicester to the northeast and Northampton to the southeast (and Milton Keynes beyond). However, the far south of the Borough is a less well-connected rural area (between Rugby and Daventry) and the central north area is also less well-connected (noting the lack of an M6 junction between Rugby and Coventry).
- 2.3.4. With regards to rail connectivity, Rugby is the only station within the Borough, but from here there are very good services to Coventry / Birmingham, Northampton and Milton Keynes / London. Also, a new Rugby Parkway Station is proposed for southeast edge of the town (south of Houlton).
- 2.3.5. The adopted Local Plan (2019) directed the great majority of growth to Rugby town – see Figures 2.1 and 2.2 – although there was also modest growth directed to select Main Rural Settlements, despite the Coventry Green Belt being a constraint to growth at six of the eight Main Rural Settlements, with the Local Plan Inspector concluding “exceptional circumstances” to justify Green Belt release.
- 2.3.6. Taking the **committed Rugby strategic urban extensions** (shown in the figures below) in turn:
- Houlton – to the southeast was allocated in the Core Strategy (2011) as ‘Rugby Radio Station’ and this allocation was taken forward into the adopted Local Plan (2019), by which time the site was under construction. Total capacity is ~6,000 homes (~1,300 now occupied) plus there is an employment area and new extensive infrastructure including a secondary school (opened in 2021).
 - Southwest Rugby – was the primary new allocation proposed by the adopted Local Plan (2019), with the plan supporting ~5,000 homes in total across 12 sites (land ownership parcels), plus major new employment land, road infrastructure and wider infrastructure including a secondary school. A Supplementary Planning Document (SPD) was adopted in 2021 but was then updated in 2024 to reflect latest understanding of infrastructure costs / delivery challenges. Employment land has now come forward at the southern edge of the site (adjacent to the M45 Junction), but the majority of the site remains unpermitted (although applications are being progressed, as discussed [here](#)).
 - Eden Park (Rugby Gateway) – to the northwest was permitted and underway by the time of the Local Plan's adoption, following a Core Strategy allocation. The extensive employment land element adjacent to the M6 junction delivered early, and the residential elements are coming forward in phases. Alongside 1,300 homes the scheme will deliver a primary school and a community hub.
 - Coton Park East – to the northeast was allocated through the adopted Local Plan (2019) for 800 homes, a smaller employment area (for “smaller units”) and a flexible school site (to deliver at least a 1fe primary, at most an all through school). Also, the plan explains that the site “*presents the opportunity to extend the existing Coton Park area, providing further housing and employment development. Houses have been built in this area for over 10 years and this final extension will provide dwellings that will assist with achieving short term housing supply targets as well as steady delivery in the midterm.*” An SPD was subsequently adopted which discussed, amongst other things, new bus and cycle routes, and a small part of the residential has now delivered. However, the land owner is now seeking to bring forward the remainder of the site for employment land.
- 2.3.7. The next matter for consideration, by way of orientation, is the location of **strategic employment sites**, which area shown in Figure 2.3. The figure is taken from the Issues and Options consultation document (2023) and additionally shows potential broad areas to explore for new employment land allocations, with these areas/options unsurprisingly correlating closely with the existing strategic employment areas.

2.3.8. Taking the locations highlighted by Figure 2.3 in turn:

- Southeast Coventry – this is a key cross border strategic employment area shared with both Coventry City Council and Warwick District Council. In particular, it should be noted that the current South Warwickshire Local Plan Preferred Options consultation document (2025) identifies a large Major Investment Site, to include a new Gigafactory on the current airport site. Within Rugby Borough, Prologis Park near Ryton-on-Dunsmore is a major employment area (primarily though not solely for 'logistics', i.e. storage and distribution) that has delivered over recent years, and there is the potential to support further employment land in this area, as part of a coordinated strategy and subject to wide-ranging factors including constraints relating to Green Belt and the River Avon.
- East Coventry – this area is not as well-connected in transport terms and there are also extensive constraints (over-and-above Green Belt). Figure 2.3 suggests the option of growth here, but in fact what has been proposed is a large employment area to the north of Coombe Country Park stretching north to the motorway junction at the NE edge of Coventry. This scheme – Walsgrave Hill – was discussed as a notable omission site within the Rugby Local Plan Inspector's Report (2019).
- NE Coventry – this is a key area given the M6 / M69 junction. The sector to the southwest falls within Coventry and is a long-standing employment area, whilst the sector to the northwest falls within Rugby Borough but has not been promoted as available, potentially reflecting more challenging connectivity and also the Oxford Canal. To the northeast a major new site was recently granted planning permission by RBC (Frasers Group Headquarters). To the southeast is Ansty Park – a major manufacturing and research and development (R&D) centre that has developed over recent years, and where expansion is an option – as well as the aforementioned Walsgrave Hill site.
- South of Hinkley – employment land at the southern edge of Hinkley (north of the A5) is long-standing, and then a logistics centre was recently delivered to the east of the M69 / A5 junction (in Hinckley and Bosworth Borough). The majority of land in this area is available for development, either for employment or a new settlement, but this is potentially not a sequentially preferable location for growth, and there are constraints/challenges including sensitive Green Belt.
- Magna Park – is a long-standing and very large-scale logistics centre located adjacent to the east of the Borough, within Harborough District. The Park is currently in the process of expanding significantly (more than doubling its historic extent), with all development within Harborough District. Virtually all land immediately adjacent to Magna Park within Rugby Borough is being promoted for employment development, but the Coventry Green Belt constrains part of this land. Expansion within the Borough was not flagged as a foremost option at the Issues and Options stage (2023).
- North Rugby – northwest Rugby is a long-standing large industrial area, and then land to the north of Rugby, adjacent to M6 J1, has been developed for strategic logistics uses over more recent years. As discussed above, whilst Coton Part East is a strategic residential-led allocation in the adopted Local Plan (2019), the landowner is now seeking a new allocation focused on employment land. A new NW Rugby strategic urban extension is also being promoted, which could deliver significant employment land, although this is Green Belt strategic road network (SRN) connectivity is not ideal.
- East Rugby – Daventry International Freight Terminal (DIRFT) was delivered in the 1990s and then DIRFTII was permitted in 2005, which involved a ~50% expansion, followed by DIRFTIII permitted in 2014 and now nearing completion, whilst DIRFT IV is now proposed. All of DIRFT is within West Northamptonshire, but adjacent to Rugby Borough, and closely linked to the new community at Houlton (discussed above). A major new employment area is being promoted to the north of Houlton (as shown in Figure 2.3), but this would be separated from Houlton by a wide flood risk zone and there is a need to carefully consider the in combination impacts of growth on the A5 capacity.
- SW Rugby – as discussed above, a major new employment area (Symmetry Park) is now nearing completion as the first phase of the SW Rugby strategic urban extension allocated through the adopted Local Plan (2019). Also, the adopted Local Plan identified land adjacent to the north of Symmetry Park as a reserve site, such that now supporting its allocation through the new Local Plan is a clear option to explore, including as it would help to fund the new infrastructure needed to realise the SW Rugby vision in full. Furthermore, the majority of land to the south, in the vicinity of the junctions onto the strategic road network, is being promoted for employment land.

2.3.9. The focus of this discussion so far has been introducing the plan area / orientation with reference to existing, recent and committed development sites and strategic employment areas (where expansion is almost invariably an option). However, there are, of course, wider introductory factors to consider.

2.3.10. Two final considerations here (recognising the potential to explore spatial issues/opportunities in much further detail in subsequent sections of this report) are as follows:

- Rugby town centre – must be a focus of the new Local Plan, as was recognised at the Issues and Options stage, including recognising changes to the context surrounding planning for town centres. A Rugby Regeneration Strategy was published in 2022, and delivering new homes is one priority.
- Green and blue infrastructure (GBI) – the adopted Local Plan includes a GBI policy map that clearly highlights broad areas of sensitivity/opportunity, including an extensive area to the east of Coventry (Princethorpe) and numerous river / stream corridors (with a concentration at Rugby town).

Figure 2.1: The adopted Local Plan Key Diagram

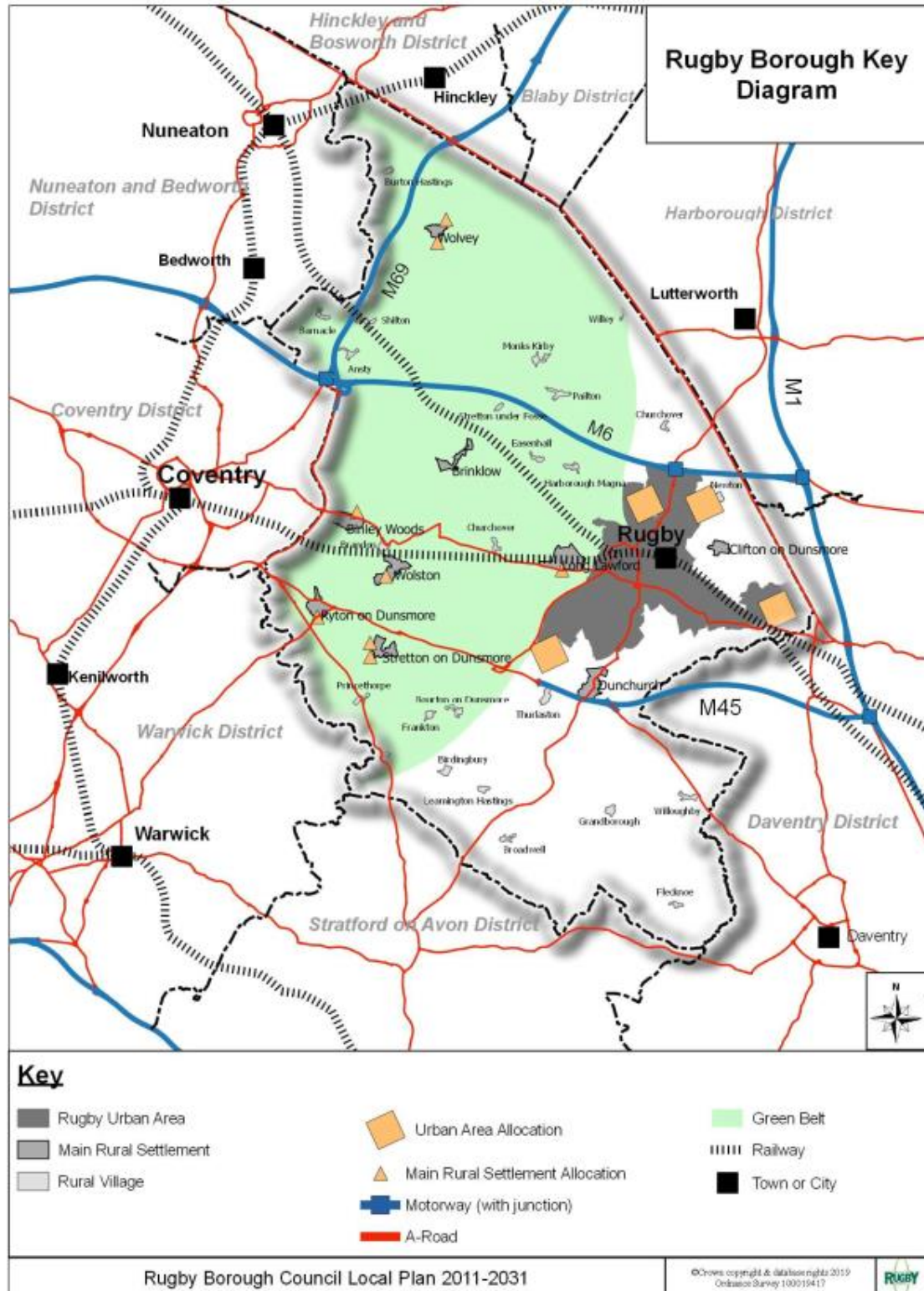


Figure 2.2: A figure from the I+Os document showing committed strategic urban extensions (in light grey)

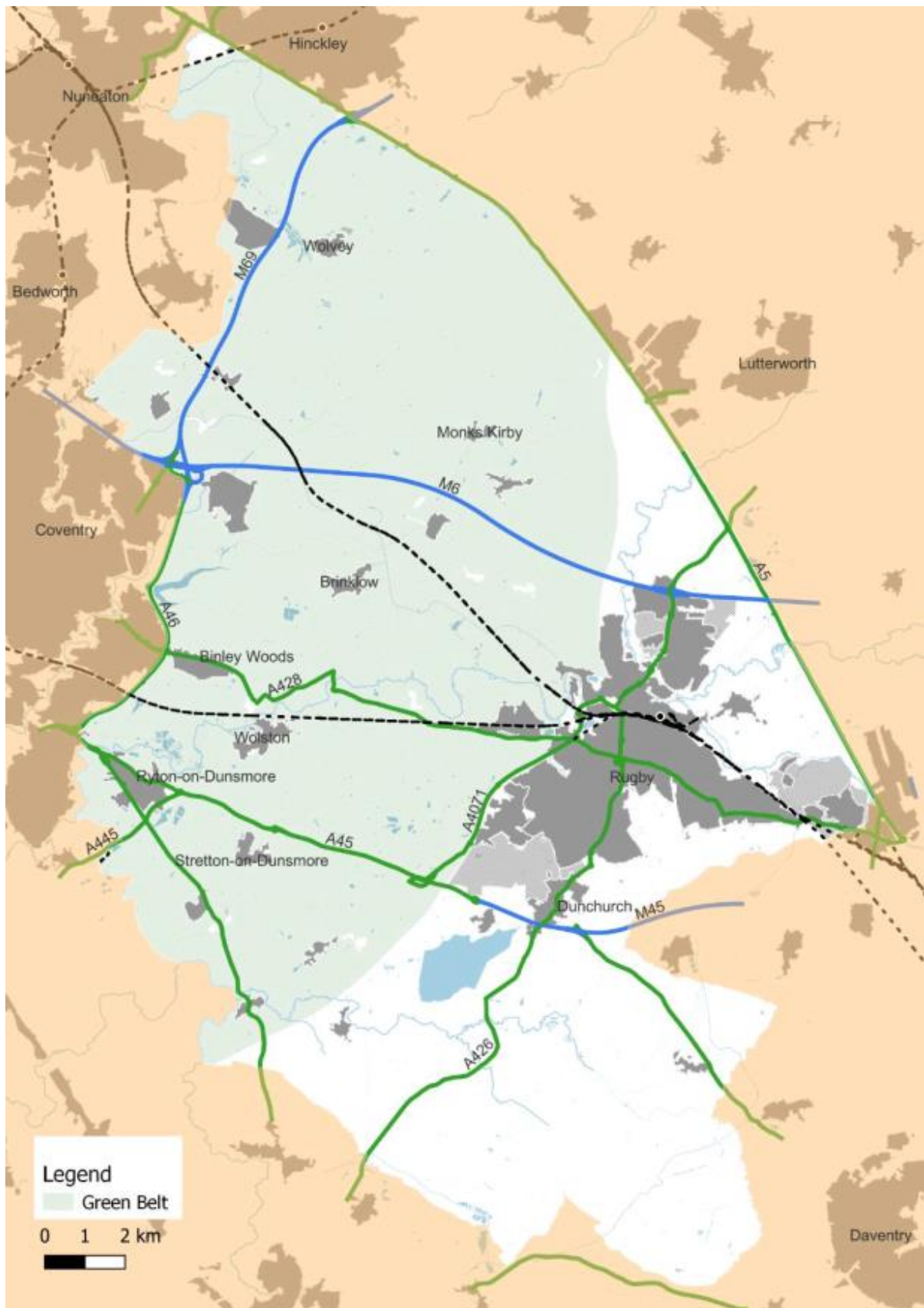


Figure 2.3: Another figure from the I+Os document showing employment areas and employment growth options



2.4. The plan period

2.4.1. The plan period is 21 years from 2024 to 2045, in light of NPPF paragraph 22 which states:

“Local plans] should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead...”

2.4.2. With regards to the start of the plan period ('base date'), there is an argument for an earlier date including because recent housing delivery has been strong, such that there is a case for seeking to 'bank' this supply as part of calculations for the plan period as a whole. However, there is increasingly consensus nationally that plan periods should not be set in the past, as far as possible, because the Government's standard method for calculating housing need moving forward (discussed above) accounts for past delivery through an affordability uplift (i.e. recent strong delivery in Rugby should, in theory, have had the effect of improving affordability and, in turn, reducing the affordability uplift). This can be debated, but there are recent examples of Planning Inspectors moving base dates forward.

2.4.3. With regards to the plan end date, a key consideration is that the West Midlands Strategic Employment Sites Study (WMSESS; 2024) provides evidence for future development needs to 2045 and 2050.

2.4.4. As of the start of the plan period (1st April 2024) there was known to be in the region of 9,750 homes supply from 'commitments', which comprises sites with planning permission or an existing allocation that can likely be rolled forward into the new Local Plan (albeit there is always a need for proportionate work to confirm that this is the case, as there is feasibly the potential to remove support for an allocation). Within this figure, almost 7,700 homes are committed across two strategic urban extensions to Rugby, namely South West Rugby and Houlton (and focusing only on supply to 2045, recognising the potential for both sites to still be delivering post 2045). With regards to employment land, as of 1st April 2024 there was in the region of 81.5 ha of committed land expected to deliver in the plan period.

2.4.5. As such, a key aim for the local plan is to identify housing and employment land supply over-and-above commitments (also a windfall assumption for housing)² sufficient to deliver on the identified requirements (i.e. one for housing and another for employment) for the plan period as a whole, where the requirements likely need to be set in line with need figures (as discussed). A further important consideration is then identifying supply to meet Gypsy and Traveller accommodation needs.

2.5. Plan objectives

2.5.1. It is important to set plan objectives early in order to guide the plan-making process.

2.5.2. Also, the plan objectives are a key input to the SA process, because of the requirement is to define, appraise and consult on reasonable alternatives taking account of *“the objectives... of the plan.”*

2.5.3. The plan objectives are as follows:

- Support the diversification and growth in sustainable locations of Rugby Borough's economy in line with the Economic Strategy
- Support the revival of Rugby town centre
- Reduce emissions and adapt to climate change
- Raise design standards
- Deliver infrastructure-led growth
- Facilitate a greener, more biodiverse borough and deliver new country parks

² The windfall assumption is the assumed level of supply from sites not allocated in the Local Plan, which in Rugby Borough means sites of fewer than 5 homes, typically in urban areas.

3. The SA scope

Introduction

- 3.1.1. The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan, i.e. when reaching conclusions on 'significant effects' (see discussion in Section 1, above). It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed in Part 1).
- 3.1.2. The aim here is to introduce the reader to the *broad scope* of the SA. Further information is presented in a stand-alone Scoping Report (2023); however, it is important for the SA scope to remain flexible, responding to the emerging plan and reasonable alternatives, and the latest evidence-base.

Consultation on the scope

- 3.1.3. The regulatory requirement is that: *"When deciding on the scope and level of detail of the information that must be included in the [SA Report], the responsible authority shall consult the consultation bodies."* As such, the consultation bodies – the Environment Agency, Historic England and Natural England – were consulted on the SA scope in 2023 (at the time of the Issues and Options consultation). All three consultation bodies provided comments, which are referenced within the appraisal sections below.

The SA framework

- 3.1.4. The outcome of scoping work in 2023 was an SA 'framework' comprising 24 objectives grouped under 18 topics. The aim of the SA framework is to ensure suitably focused and concise appraisal, and, in this light, it is now considered appropriate to make some adjustments to the framework – see Table 3.1.
- 3.1.5. Specifically, whilst no objectives have been deleted, several have been edited, and it is now considered appropriate to group the objectives under 13 topic headings, with a view to ensuring an appraisal that is suitably structured, in terms of balancing a need to be both: A) systematic; and B) concise and accessible, with minimal repetition of points and discussion of 'non-issues'.
- 3.1.6. Comments on the SA framework and wider scope are welcome through the current consultation.

Table 3.1: The SA framework and adjustments made since the Scoping Report

Final topic	Objectives	Comments ³
Accessibility (to community infrastructure)	Ensure good access to schools and other services/facilities	New objective
	Improve the quality and accessibility of leisure opportunities	Unchanged
	Protect and enhance the quality of public areas and green spaces	Unchanged
Air quality	Reduce air pollution and ensure air quality continues to improve	Unchanged
Biodiversity	Conserve and enhance biodiversity	Minor edit
Climate change mitigation	Address climate change by reducing greenhouse gas emissions	Minor edit
	Increase energy efficiency and the proportion of energy generated from renewable sources	Unchanged
Climate change adaptation	Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	Unchanged
	Address wider climate change impacts including overheating	New objective

³ Numerous references to "the borough" have been deleted to ensure that issues and effects are considered blind to administrative boundaries and, in turn, allow for consideration of cross-boundary and larger-than-local issues / effects.

Final topic	Objectives	Comments
Communities, health and well-being ⁴	Improve health and wellbeing	Minor edit
	Reduce poverty and social exclusion	Unchanged
	Provide opportunities for interaction	Minor edit
	Reduce crime and disorder	Unchanged
	Ensure the vitality and viability of Rugby town centre	Unchanged
Economy and employment ³	Increase investment in Rugby's economy including to facilitate sustainable regeneration	Minor edit
	Ensure high and stable levels of employment so all can benefit from economic growth	Unchanged
	Provide opportunities for residents to work locally in line with 'sustainable transport' objectives	Minor edit
	Ensure the vitality and viability of Rugby town centre	Unchanged
Historic environment	Protect and enhance the historic environment	Unchanged
Homes	Ensure that everyone has the opportunity to live in a decent and affordable home	Unchanged
Landscape and townscape	Protect and enhance the countryside particularly valued landscapes	New objective
	Ensure a high quality townscape incorporating good design principles for buildings and surrounding spaces	Unchanged
Resources	Protect productive agricultural land	New objective
	Improve efficiency in land use through the re-use of previously developed land and existing building	Unchanged
	Support sustainable resource consumption and waste management	Minor edit
Transport	Reduce the need to travel and reduce the effects of traffic on communities	Unchanged
	Facilitate modal shift away from use of the private car to other forms of travel including walking, cycling and public transport	Minor edit
Water	Maintain and improve water resources and water quality, including accounting for wastewater treatment	Significant edit (expanded)

⁴ A concern can relate to the fact that environmental topics are more numerous within the framework than socio-economic topics, but concerns are allayed by the fact that the aim of SA is not to reach overall conclusions on sustainability (in respect of "the plan and reasonable alternatives" but rather to reach conclusions under each of the SA topic headings in turn. As such, SA does not involve giving any consideration to the degree of importance, or 'weight', that should be assigned to each topic.

The approach taken is common and reflect the reality that the environmental pillar of sustainable development can be easily and effectively subdivided into discrete topics in a way that the social and economic pillars cannot. Attempting to subdivide the social and economic pillars can prove ineffective, particularly when this step is taken early in the process before it is known what precisely the focus of the appraisal will be. Specifically, the risk of early subdivision is that the appraisal proves ineffective in that there is unhelpful repetition of appraisal discussion and/or distracting discussion of insignificant or even non-issues.

With regards to the social pillar, the approach taken is to explore matters under two topic headings, with standalone consideration given to 'accessibility to community infrastructure'. This tends to work well and for the Rugby Local Plan it is known that access to schools with capacity is an emerging key issue (in light of recent evidence in 2025). With regards to the economic pillar, one possibility for ongoing consideration is a split between: A) objectives relating to the larger-than-local including national economy; and B) objectives relating to local objectives including around employment and regeneration.

Part 1: What has plan-making / SA involved up to this stage?

4. Introduction to Part 1

Overview

- 4.1.1. Plan-making has been underway since 2022, with one formal consultation having been held to date, namely the Issues and Options consultation in 2023. However, the aim here is not to relay the entire backstory, nor to provide an ‘audit trail’ of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2025 ahead of the current consultation. Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with – see **Section 5**
 - present an appraisal of the reasonable alternatives – see **Section 6**
 - explain the Council's reasons for selecting the preferred option – see **Section 7**
- 4.1.2. Presenting this information aligns with the requirement for the SA Report to present an appraisal of reasonable alternatives and “*an outline of the reasons for selecting the alternatives dealt with*”.

Reasonable alternatives in relation to what?

- 4.1.3. The legal requirement is to examine reasonable alternatives (RAs) taking account of “*the objectives and geographical scope of the plan*”, which suggests a need to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites** (NPPF para 69), to meet objectively assessed needs and wider plan objectives. Establishing a spatial strategy is clearly a central objective of the Local Plan.⁵
- 4.1.4. Spatial strategy alternatives can perhaps more accurately be described as **alternative key diagrams**, where the key diagram is a reflection of established development requirements, spatial strategy and site selection. Alternative key diagrams can then be termed ‘**growth scenarios**’ as a shorthand.
- 4.1.5. Housing and employment land are key matters to explore across growth scenarios, and identifying a supply sufficient to provide for Gypsy and Traveller accommodation needs is a further consideration.

What about site options?

- 4.1.6. Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case and is not the case here. Rather, the objective is to allocate a *package* of sites to meet needs and wider objectives, hence RAs must be in the form of alternative *packages* of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing reasonable growth scenarios (Sections 5.3 and 5.4), i.e. as a means to an end.

What about other aspects of the plan?

- 4.1.7. As well as establishing a spatial strategy, allocating sites etc, the Local Plan must also establish policy on thematic district-wide issues, as well as site-specific policies. Broadly speaking, these can be described as development management (DM) policies. However, it is a challenge to define “reasonable” DM policy alternatives, and, in this case, none are identified following discussion with RBC officers.³

N.B. informal consideration is given to DM policy alternatives Part 2, as discussed in Section 8.

Structure of this part of the report

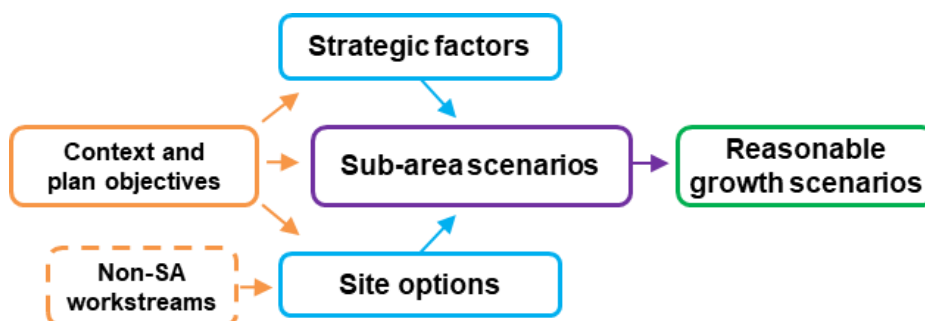
- 4.1.8. There are three sections within this part of the report:
- **Section 5** – explains a process to define reasonable growth scenarios
 - **Section 6** – presents an appraisal of the growth scenarios
 - **Section 7** – presents the Council's response to the appraisal and, in turn, their reasons for supporting the preferred approach as one that is justified and represents sustainable development.

⁵ Another consideration is that to be ‘reasonable’ alternatives must be meaningfully different to the extent that they vary in terms of **significant effects**, where significance is defined in the context of the plan (taken as a whole). A focus on key diagram RAs (‘growth scenarios’) guarantees that this will be the case, and so negates the need for a process of screening what should and should not then be a focus of subsequent work to explore (i.e. define, appraise and consult upon) RAs.

5. Defining growth scenarios

- 5.1.1. The aim here is to discuss the process that led to the definition of reasonable growth scenarios in 2025. To reiterate, growth scenarios equate to **reasonable alternatives**.

Figure 5.1: A standard broad process to define reasonable growth scenarios



- 5.1.2. This process is described across the following sub-sections:

- **Section 5.2** – explores **strategic factors** with a bearing on growth scenarios.
- **Section 5.3** – considers individual **site options**, as the ‘building blocks’ of growth scenarios.
- **Section 5.4** – draws upon the preceding two sections to consider options/scenarios for **sub-areas**.
- **Section 5.5** – combines sub-area scenarios to form **reasonable growth scenarios**.

- 5.1.3. With regards to the **context**, the first point to make is that key context is provided by responses received to the Issues and Options consultation (2023). Consultation responses are quoted below.

- 5.1.4. Secondly, there is a need to acknowledge that numerous ‘non-SA’ workstreams must feed-in, but there are invariably challenges in terms of timings.⁶ Key workstreams underway in 2025 to account for as part of work to define RA growth scenarios, as far as practically possible, include the following:

- Workstreams examining Green Belt sites – exploring the extent to which Green Belt site options contribute to the defined Green Belt purposes is a key task and known as Green Belt Review. Work on a Green Belt Review commenced in 2024 but was delayed on account of a delay to Government guidance on Grey Belt, which is a new category of Green Belt introduced by December 2023 NPPF. The Government guidance was eventually published in late February 2025.
- Scheme specifics – generating an understanding what specific site options would or could deliver (e.g. in terms of land uses and infrastructure) involves a detailed process, and attention naturally focuses on emerging proposed allocations more so than emerging omission sites. However, it is both emerging proposed allocations and emerging omission sites that must be a focus of the process set out below.
- Infrastructure Delivery Plan (IDP) – infrastructure planning is a major undertaking for any local plan, and the reality is that the complexity of the work means that there is a pragmatic need to focus attention on the emerging preferred approach, with limited if any potential to explore alternative growth scenarios. Also, the reality is that it is work that must be completed late in the day, once the preferred approach is near-finalised and taking into account a range of other workstreams.

A note on limitations

- 5.1.5. It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the *definition* of reasonable alternatives. This amounts to a relatively early step in the plan-making process which, in turn, has a bearing on the extent of work that is proportionate, also recalling the legal requirement, which is to present an “**outline of the reasons for selecting alternatives...**” [emphasis added].

⁶ Equally, there are some workstreams that cannot be completed in time for this current Regulation 18 consultation and so will need to feed in subsequently, i.e. prior to finalising the plan for publication under Regulation 19, with one notable example being strategic transport modelling. In short, working in the context of evidence base limitations is a reality of local plan-making.

5.2. Strategic factors

Introduction

5.2.1. The aim of this section of the report is to explore strategic factors (issues and options) with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:

- Quantum – how much development is needed (regardless of capacity to provide for it)?
- Broad spatial strategy – broadly where is more/less suited to growth, and what typologies are supported?

Quantum

5.2.2. This section sets out understanding of development needs in respect of housing, employment land and Gypsy and Traveller accommodation in turn. In each case, in addition to setting out understanding of objectively assessed need (NPPF para 11), the aim is to also explore *high level* arguments for the Local Plan providing for a quantum of growth either above or below objectively assessed need.

Housing

- 5.2.3. A central tenet of local plan-making is the need to **A**) objectively establish housing needs ('policy-off'); and then **B**) develop a response to those needs through the local plan ('policy-on'). Planning Practice Guidance explains: *"Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement..."*
- 5.2.4. With regard to (A), the NPPF states that local housing need (LHN) should be established via an assessment "conducted using the standard method". With regard to (B), most local authorities respond to LHN by setting a housing requirement that equates precisely to LHN. However, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.
- 5.2.5. For Rugby Borough the Government's standard methodology establishes an **LHN** figure of 618 dwellings per annum (dpa), or 12,978 homes in total over the 21 year plan period.
- 5.2.6. There is little question of setting the housing requirement at a figure **below LHN** (i.e. not providing for LHN in full, leading to unmet need), given the relatively limited nature of constraints affecting the Borough and recognising that the Borough has been delivering ~1,000 dpa over recent years.
- 5.2.7. With regard to a housing requirement set **above LHN**, NPPF para 67 explains: *"The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment."*
- 5.2.8. With regard to unmet need, this is an ongoing consideration, recognising that the adopted Local Plan (2019) makes provision for unmet need from Coventry.⁷ However, the emerging Coventry Local Plan is expected to make provision for LHN in full,⁸ and there is little risk of unmet need from elsewhere.⁹

⁷ Policy DS1 explains that the requirement is 12,400 homes *"including 2,800... to contribute to Coventry's unmet needs."*

⁸ The Proposed Submission Coventry Local Plan (December 2024) states: *"The Local Housing Need for Coventry for the period 2021-2041 is therefore 29,100 (1,455 per annum) and this will be delivered fully within Coventry's administrative area."* It then goes on clearly to state that the housing requirement is 29,100 homes and that the total identified supply is 31,954 homes (i.e. there is a healthy 'supply buffer'). Furthermore, following publication of the Proposed Submission Plan the Government published the new standard method, which assigns Coventry a lower housing need figure of 1,388 homes per annum.

⁹ The Leicester Local Plan is nearing adoption and generates very significant unmet need, but a preferred broad approach to addressing this unmet need has been agreed amongst the Leicestershire local authorities. Having said this, the Leicester Local Plan looks only to 2036 and there is a commitment to commencing an immediate review looking much further ahead, e.g. to 2045. As such, there will likely be further unmet need to be dealt with in the near future and, as part of this, there could be pressure for growth in the vicinity of Hinkley and, in turn, pressure for Hinkley-related growth within Rugby Borough.

Aside from Leicester, it is recognised that there are major challenges dealing with unmet housing need arising from Greater Birmingham, but attention focuses within an established housing market area that does not include Coventry or Rugby. The Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA; 2022) was clear that: *"Both Stratford-on-Avon and North Warwickshire districts sits across the Coventry & Warwickshire and Greater Birmingham Housing Market Areas. These authorities will therefore need to consider unmet needs from Birmingham in setting housing targets within their respective local plans alongside any unmet needs from within the Coventry & Warwickshire HMA."*

- 5.2.9. With regard to the possibility of a setting the housing requirement above LHN on the basis of “*growth ambitions...*”, this is unlikely to be a significant consideration. The Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA; 2022) stated clearly: “*Demographic growth... supports sufficient growth in labour supply across Coventry and Warwickshire as a whole; and there is therefore no case for [housing requirement > LHN].*” However, it is recognised that this conclusion was reached at a point in time in light of a particular set of forecasts, which are subject to change.¹⁰
- 5.2.10. Beyond unmet need, the next most significant factor, when considering the high level possibility of a housing requirement set above LHN is affordable housing need, with the Government’s Planning Practice Guidance (PPG) explaining that a boost to the housing requirement “*may need to be considered where it could help deliver the required number of affordable homes*”.
- 5.2.11. Affordable housing need is understood to be high as a proportion of LHN, such that a housing requirement set at LHN would not provide for affordable housing need in full (recognising that affordable housing is delivered by market led housing schemes at a rate limited by development viability), and it should also be noted that Coventry’s affordable housing need is very high as a proportion of LHN.¹¹
- 5.2.12. The implication is that affordable housing need *does* serve as a high level reason to remaining open to a housing requirement set above LHN. However, the question of ‘uplifting’ to reflect affordable housing needs is complex, as succinctly explained recently by the West Berkshire Local Plan Inspector:
- “... [The plan] is expected to deliver a total of 2,190 affordable homes on market-led schemes... There would be a nominal deficit of around 3,420 against the identified need for... affordable homes although the link between affordable and overall need is complex as many of those identified as being in need of an affordable home are already in housing.”
- 5.2.13. Finally, in respect of affordable housing, it should be noted that the HEDNA (2022) *does not* provide clear evidence upon which to base a decision to set the housing requirement at a figure above LHN:

“*In setting housing [requirements] in individual local plans, the affordable housing evidence is also relevant. In the northern part of the sub-region in particular – in North Warwickshire and Nuneaton and Bedworth – this supports the case for considering, as part of the plan-making process, [a housing requirement set above LHN] in order to boost the delivery of affordable housing.*”

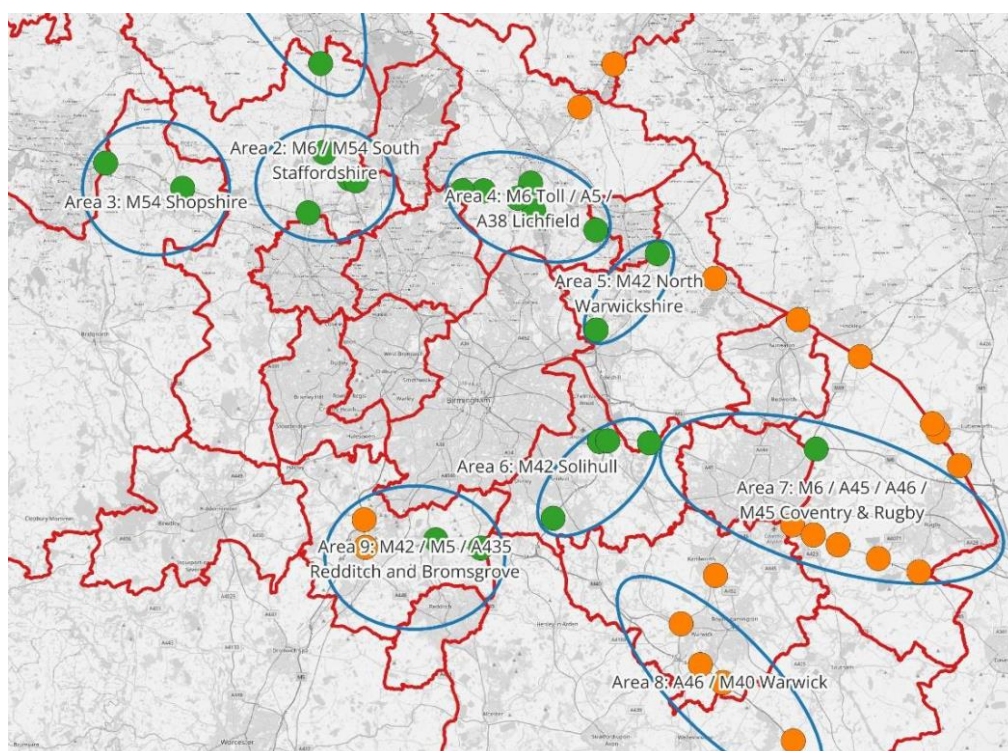
Employment land

- 5.2.14. As an initial point, attention can focus on industrial land, as whilst there is a need for additional office space (including R&D space) over the plan period, this is quite modest and is set to be comfortably met by new supply from sites that are already committed (specifically, sites with planning permission).
- 5.2.15. Focusing on industrial land, there is a consensus regarding two broad categories:
- Strategic need – ‘Big box’ strategic logistics operations that often need sites of at least 25 ha; and
 - Local need – other industrial land where needs are often met most effectively on sites below 25 ha.
- 5.2.16. Beginning with **strategic need**, the first point to note is that whilst the HEDNA explored need for Coventry and Warwickshire, this was in 2022, whilst there is also a need to account for a subsequent West Midlands Strategic Employment Sites Study (WMSESS) published in 2024. This is important because the market for occupiers of strategic logistics sites is regional rather than localised.
- 5.2.17. In order to do so, the Coventry and Warwickshire authorities jointly published an Alignment Paper in November 2024. The calculations are complex, but the first point to note is that a need figure is established not for Rugby Borough alone but for a cross border ‘opportunity area’, specifically Area 7 shown in Figure 5.2. This opportunity area comprises Rugby Borough and Coventry City Council together with a small part of both Nuneaton and Bedworth Borough and Warwick District.

¹⁰ The HEDNA (2022) explained: “*Econometric forecasts do not point to as strong growth moving forwards as we have seen in recent years (with the economic forecasts showing additional job creation of c. 3,300 which falls below labour supply growth in the trend-based projections).*”

¹¹ For context, the Proposed Submission Coventry Local Plan (2024) requires affordable housing at a rate of 25%, and Policy DS2 (The Duty to Co-operate and partnership working) states: “*In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city’s wider housing needs being met.*”

Figure 5.2: Strategic logistics opportunity areas also showing two categories of SRN junctions



- 5.2.18. The Alignment Paper concludes a need for 84ha (294,000 m² floorspace) required in opportunity area 7 to 2045, and there is a strong case to suggest that this should all be provided for in Rugby Borough. This reflects: A) a clear lack of capacity in Coventry; B) only a small part of Warwick District is within the opportunity area, and this is already allocated for development through the Coventry Gateway and Coventry Airfield schemes; and C) Nuneaton and Bedworth's Local Plan is at a very advanced stage.
- 5.2.19. The next step is then to adjust the 84 ha figure, accounting for the fact it is a net figure that accounts for commitments as at 2022. To calculate the gross need figure the supply commitments for Rugby Borough listed in the Alignment Paper must be added back in, which amount to 201 ha.
- 5.2.20. From this can then be subtracted completions on those sites in the period 2022-2024 totalling 67.5 ha to bring the figures up to a 2024 base date. It is therefore proposed that Rugby's gross need figure for the period 2024 – 2045 is 284 ha (84 + 201 – 67.5), which amounts to 761,250 m² additional floorspace.
- 5.2.21. Moving on to **local need**, the Alignment Paper identifies Rugby Borough-specific need for 68 hectares (272,000 m² floorspace) over the period 2021-2045, and from this can be subtracted 1.7 ha (6,704 m² floorspace) delivered over 2022-2024. This generates a need figure of 66.3 ha (265,296 m² floorspace).
- 5.2.22. Combining strategic and local need then results in an overall industrial land need figure of 284 ha (1,026,546 m² floorspace). From this can then be subtracted committed supply from planning permissions (as of 1 April 2024) and existing local plan allocations (that can likely be rolled forward). This includes four standout large sites, namely Coton Park east (26,421 m²), Prospero Ansty and Ansty Park (26,663 m²), Symmetry Park, Thurlaston (83,541 m²) and Padge Hall Farm (136,350 m²).
- 5.2.23. Having accounted for commitments (as of 1 April 2024), the residual industrial land need figure to be addressed through local plan allocations is 202.5 ha or **(739,559m² of floorspace)**.¹²
- 5.2.24. However, it can also be noted that a further large site gained planning permission post 1 April 2024 for 274,388 m², namely Crowner Fields Farm, Ansty (Fraser Group Headquarters).
- 5.2.25. The above calculations is set out in more detail in a development needs topic paper.

¹² Floorspace is the more robust measure because it is difficult to make generalisations about what proportion of gross site areas will be developable. However, on the other hand, hectareage allows for ease of comparison with residential land take.

Gypsy and Traveller accommodation

- 5.2.26. A Gypsy and Traveller, Travelling Showperson and Houseboat Accommodation Assessment (2025). Focusing on Gypsy and Traveller pitches, the Assessment identifies a total need for 94 pitches over the period 2024 to 2041 (i.e. such that plan period need to 2045 may be slightly higher). Of this need, 35 is over the short-term 5 year period (i.e. to 2029) and 59 is over the longer-term.
- 5.2.27. This is a significant level of need. However, the Assessment is also clear that significant supply (up to 47 pitches) can be delivered by means other than allocating new sites, namely by “regularising” existing tolerated pitches (22 pitches across five sites) and by intensifying and/or extending existing sites.
- 5.2.28. The other consideration is then moorings for houseboats, with the Assessment concluding a need for at least 20 moorings. There is then no need for Travelling Showpeople plots.

Conclusion on growth quanta

- 5.2.29. Beginning with housing, there is a clear need to focus on growth scenarios that would involve a level of supply sufficient to allow the housing requirement to be set at LHN,¹³ but there is also a high level case for remaining open to the possibility of higher growth scenarios, subject to consideration of supply options below. This high level case primarily relates to affordable housing need.
- 5.2.30. With regard to employment land (industrial land), the conclusion above is as follows: *“Having accounted for commitments (as of 1 April 2024), the residual industrial land need figure to be address through local plan allocations is 202.5 ha or (739,559m2 of floorspace). However, it can also be noted that a further large site gained planning permission post 1 April 2024 for 274,388 m2...”*
- 5.2.31. A key point to note is that this figure relates to *residual* need (i.e. what is left to be provided for through the Local Plan after having accounted for existing supply from completions and commitments), which is in contrast to the discussion above on housing (residual need is discussed below).
- 5.2.32. There is a clear case for providing for the residual need figure in full, subject to consideration of supply options below. However, the calculations presented above do leave the door open to the possibility of exploring lower growth in employment land.
- 5.2.33. Finally, the Local Plan must also take steps to identify new supply of Gypsy and Traveller pitches, although there is also the potential to assume some supply from windfall sites, assuming that the Local Plan sets suitably permissive development management policy.
- 5.2.34. The question of growth quanta figures to reflect across reasonable growth scenarios is returned to within Section 5.5, subsequent to consideration of supply options in in Sections 5.3 and 5.4.

Broad spatial strategy

- 5.2.35. The aim of this section is to explore ‘broad spatial strategy’ issues, opportunities and options, building upon the introductory discussion presented in Section 2.
- 5.2.36. It is important to re-emphasise that this amounts to an early high level discussion, with discussion of certain broad spatial issues and opportunities deferred to Section 5.4 (Sub area scenarios).
- 5.2.37. This section is structured under thematic headings, with the order of thematic headings reflecting a broad understanding of significance to the task at hand.
- 5.2.38. Specifically, the discussion covers: 1) employment land spatial strategy; 2) the settlement hierarchy; 3) infrastructure; 4) Gypsy and Traveller accommodation needs; and 5) wider factors.

¹³ There is typically a need to identify a level of housing supply that exceeds what is required, as a contingency (‘supply buffer’) to account for unforeseen delivery issues, which are fairly inevitable, including recognising that allocated sites will be scrutinised in detail at the planning application stage, which can lead to delivery being delayed and/or capacity being reduced. There are no nationally established rules or expectations, but it is fair to say that the scale of the supply buffer should reflect the level of delivery risk inherent in the identified supply, with larger / strategic sites tending to be associated with delivery risk on account of complexity and infrastructure dependencies, and also brownfield sites tending to have high risk relative to greenfield.

Employment land spatial strategy

5.2.39. Building upon the discussion of ‘growth quanta’ above, the first point to make here is that a key priority is to explore options suited to industrial uses other than large-scale logistics (use class B8), which primarily means ‘**general industrial**’ (use class B2).¹⁴ This is on the basis of two factors:

- The residual need figure for B8 is not high after having taken into account a very extensive pipeline of supply of B8 sites with planning permission.
- There are two site options at Rugby that are clearly well-suited for allocation in order to deliver the residual need figure for B8, because they are *to some extent* already committed. These sites have already been introduced above (Section 2) and clearly must be discussed in further detail below (Sections 5.3 and 5.4) before a final decision is reached regarding their suitability for allocation, but they warrant being flagged here (Section 5.2). These sites are introduced further in Box 5.2.

Box 5.1: Introducing two strongly performing employment land options

First and foremost, SW Rugby Employment Land Phase 2 is an existing Reserve Site (as shown on the Adopted Policy Map for Rugby Borough) and there is now a well-established need to support this site in order to fund and ultimately deliver a new link road crucial to the SW Rugby Strategic Urban Extension (SUE) vision. The site would deliver significant public open space as a buffer to Cawston Spinney woodland.

Secondly, Coton Park East is an existing allocation for residential, as opposed to employment, but the landowner now has a clear desire to deliver employment, such that there is insufficient confidence that a residential allocation would come forward (and a further lengthy delay to the site’s development would delay associated investment in the area). It is also the case that the site is well suited to employment land because of its location close to the M6 and because it is accessed through the existing Central Park industrial area. The draft policy will require delivery of smaller units on part of this site, together with land to expand Rugby Free Primary School.

Both of these sites will likely deliver B8, given existing demand, but could also be suited to some B2.

5.2.40. The implication is that a focus on smaller / small employment land allocations – potentially a ‘dispersal’ strategy – is undoubtedly a high level option for the local plan. However, on the other hand, there is a need to recognise that B2 uses can and do flourish on larger sites, with a primary example of this being Ansty Park, which is a large site home to numerous manufacturing, R&D and office uses.

5.2.41. In turn, the broad employment land growth options identified at the Issues and Options stage (Figure 2.3, above) do remain a helpful starting point for exploring employment land allocation options.

5.2.42. Figure 2.3 shows eight options, and a further option is Magna Park (as introduced in Section 2, above). These nine options (and others) are discussed further in Section 5.4, but even at this early stage in the process (of defining growth scenarios) can be placed in a broad sequential order of preference:

- **SW Rugby SUE** (see Box 5.1) – performs strongly as an existing Reserve Site.
- **M6 Junction 1** (Coton Park East; see Box 5.1) – performs strongly as an existing allocation.¹⁵
- **M6 Junction 2** – a northern expansion to Ansty Park performs strongly despite comprising Green Belt. This is because: A) the land is very well suited to delivering B2 uses; and B) Ansty Park has good links to Coventry, which is a key sub-regional centre, in terms of population/labour and economic activity, and from where significant unmet need for employment land is emanating.

There are also several other options in this area, but all are clearly sequentially less preferable.

- **Prologis Park, Ryton** – a western expansion of Prologis Park would form part of a SE Coventry employment land cluster that is of at least sub-regional importance, and links to Coventry are very strong (including the University of Warwick, which is home to the [Warick Manufacturing Group](#)). However, there are some locational challenges, and the site would at least partially deliver B8.
- **North of Houlton** – a benefit is good links to Rugby and Houlton; however, a concern is the cumulative impacts of sub-regional growth on the A5, plus there are some wider constraints.

¹⁴ Also use class EG(iii): Industrial processes which can be carried out in a residential area without detriment to amenity.

¹⁵ There is also the option of a mixed use strategic urban extension to the northwest of Rugby (as introduced in Section 2), or an employment scheme here, but this is a separate matter for consideration (see Section 5.4).

- **A45/A4071** – whilst there is a strategic case for remaining open to further strategic employment land in the vicinity of the SRN junction in the fullness of time, given good links to Rugby and Coventry (and Daventry) and also noting significant publicly owned land, a concern is that this would be premature ahead of the SW Rugby SUE to coming forward alongside its associated infrastructure. Very careful consideration has been given to infrastructure planning and also masterplanning, particularly with a focus on minimising impacts to the villages of Dunchurch and Thurlaston.
- **Magna Park** – the park is already very large, continues to expand and is set to expand further through the new [Harborough Local Plan](#). Whilst further expansion through the Rugby Local Plan is an option to consider, including given land located outside of the Green Belt and other land in the Green Belt that may comprise Grey Belt, a key concern is that this is a rural location distant from major centres of population/labour, with implications for transport and wider objectives. Also, there is a need to carefully consider in-combination impacts of growth on the strategic road network.

There is also limited numerical argument for allocation, given sequentially preferable locations suited to delivering B8 at Rugby (as discussed above). Also, the site is distant from main centres of population, and there would be a concern around the in-combination impacts of high B8 growth on Rugby, given that a high proportion of Magna Park workers are thought to live in Rugby. In particular, the concern is around a recent increase in Houses in Multiple Occupation (HMOs) within Rugby, with the Council now having introduced an [Article 4 Direction](#) to address this issue.

- **Walsgrave Junction** (or Walsgrave Hill) – this is a cross border site with the western part located to the west of the A46 in Coventry City and a proposed residential allocation for 900 homes in the emerging Coventry Local Plan. Land to the east of the A46 in Rugby Borough is promoted for employment – primarily B8 logistics – but this performs poorly relative to options discussed above, noting biodiversity and landscape / Green Belt constraint and the extent of committed growth and sequentially preferable locations for growth in close proximity (see further discussion below). A [new A46 junction](#) is proposed here, but this cannot be assumed ahead of the forthcoming DCO decision.
- **South of Hinkley** – beginning with land at the far northwest of the Borough, south / southwest of Hinkley, this performs notably poorly and need not be a focus here (see further discussion below). Attention focuses more on land in the direct vicinity of M69 Junction 1, but the strategic case for growth here is not as strong as it is at the edge of Coventry (as a key centre of economic activity and population/labour), and perhaps also not as strong as it is on the edge of Rugby. Also, this is Green Belt and there are constraints to growth here, most notably an extensive area of valued woodland.

5.2.43. In **conclusion**, there is limited case for giving further detailed consideration to the growth options lower down in the list presented above, given the extent of employment land needs (accounting for both 'strategic' and 'local' need). Nonetheless, all of the options are discussed in further detail in Section 5.4, before a final decision is made regarding which to take forward to the reasonable growth scenarios. Finally, it is important to reiterate that the bullet points above focus on strategic employment land growth options, but there is also a need to remain open to small employment land site options (see Section 5.4).

The settlement hierarchy and ensuring a balanced strategy

- 5.2.44. Whilst the discussion above focuses on employment land strategy, as a key issue for the local plan, there is now a need to turn attention to strategy with a bearing on residential and mixed use allocations.
- 5.2.45. A clear starting point is the settlement hierarchy (Figure 5.1) which comprises Rugby and then eight villages in a second tier, namely main rural settlements, followed rural villages. Further key information is provided by a Rural Sustainability Study (2025) which assigns all settlements a settlement score.
- 5.2.46. Beginning with **Rugby**, the town must clearly be a focus of growth through the Local Plan. However, there is a need to account for a very high level of committed growth (also recent growth), particularly from a delivery perspective (also accounting for the impacts of growth on local communities).
- 5.2.47. As has already been introduced above, the committed strategic urban extensions (SUEs) have all faced delivery challenges (less so Eden Park). A very strong indication of the faced, in addition to delivery delays, is latest understanding / expectations in respect of the proportion of homes delivered at the SUEs that will be affordable (see NPPF glossary definition). At Houlton, understanding at the time outline permission was granted was that the site was unable to viably deliver *any* affordable housing, and it is not clear that the situation is much better for SW Rugby (discussions remain ongoing).

5.2.48. It follows that, in order to avoid ongoing and further delivery issues, there is a need to carefully consider the location and type of site options at Rugby that are taken forward for further consideration. The north of the town has the benefit of being more distant from committed growth areas (SW Rugby and Houlton) and there is also a need to focus attention on small and medium-sized sites that would represent a different offer to home buyers and housebuilders relative to strategic urban extensions.

5.2.49. Finally, it can be noted that the need to factor-in delivery challenges at Rugby as part of local plan broad spatial strategy is not a new issue, with the Inspector's Report for the adopted Local Plan explaining:¹⁶

"... since 2011 monitoring shows that a distribution focused so heavily on Rugby town has been unable to deliver housing at the rate necessary to achieve [the committed requirement]. That is notwithstanding the steps taken by the Council to accelerate the delivery of the existing SUEs. As a result the Council has not been able to maintain a deliverable 5 year housing land supply in recent years..."

... The Housing Delivery Study (2015) (HDS), commissioned by the Council to consider market capacity for housing delivery in and around Rugby, also concludes that continued reliance on a limited number of large SUEs on the edge of Rugby is unlikely to deliver housing at the rate necessary to support the increased housing target in the submitted Plan at 660 dpa. To this end, in order to increase delivery rates, the HDS recommends a broader mix of locations for new housing including a major growth location away from Rugby and developments in the smaller settlements of the borough."

5.2.50. After Rugby town the next port of call is the edge of Coventry and also Hinckley:

- **Edge of Coventry** – there are no clear or realistic options for housing growth on the edge of Coventry, with attention instead focusing on villages near to the Coventry. This is essentially because the A46 “represents a strong, clearly defined boundary” to the City (para 72 of the Inspector's Report for the adopted Local Plan) and is a clear barrier to movement, whilst land in the vicinity of the two junctions is suited to employment land as opposed to residential or mixed use.
- **Edge of Hinckley** – this area has already been discussed as having relatively low suitability for employment land, and the two key constraints that have been discussed – Green Belt sensitivity and A5 junction capacity – apply similarly to the question of residential or mixed use development.

5.2.51. In summary, the above discussion suggests limited case for a new strategic urban extension to Rugby (with attention instead focusing more on small and medium-sized extensions) and no realistic prospect of the Local Plan directing residential or mixed use development to the edge of Coventry or Hinckley.

5.2.52. In turn, there is a clear case for at least exploring the possibility of directing a proportion of growth to the villages over-and-above the adopted Local Plan. This might be described as a **dispersal strategy**, although this is arguably not helpful terminology, as under any reasonable scenario a good proportion of growth would still need to be directed to Rugby, and also there would still be a case for larger sites that are well placed to deliver a mix of uses and/or new or upgraded infrastructure alongside new homes.

5.2.53. With regards to the villages, attention focuses squarely on the **main rural settlements**, with there being no strategic case for allocation at any of the smaller villages (third tier settlements), given the number of homes needed Borough-wide and the need to direct growth broadly in line with the settlement hierarchy (i.e. given no clear case for a major departure from the hierarchy). It is also the case that smaller villages have the potential for growth via a neighbourhood plan (albeit neighbourhood plans have limited potential to release land from the Green Belt) and via rural exception sites.

5.2.54. When looking to differentiate between the eight main rural settlements, key considerations include:

- Rural Sustainability Study (2025) – villages are scored by access to services, public transport and internet. Dunchurch has comfortably the best overall score, followed by Binley Woods and Wolston, whilst Wolvey has the lowest overall score followed by Ryton-on-Dunsmore. Of the four remaining villages, there is a notable distinction between two with a better local offer (Brinklow and Clifton upon Dunsmore) and two with better public transport (Long Lawford and Stretton-on-Dunsmore).
- Green Belt – six of the eight are within the Green Belt, specifically all bar Dunchurch and Clifton upon Dunsmore. One of the Green Belt villages – Long Lawford – is very close to the Rugby edge.

¹⁶ In preparing the Plan the Council has undertaken a thorough assessment of housing capacity through the Strategic Housing Land Availability Assessment (SHLAA)36, which reveals very limited development opportunities remaining within the urban area of Rugby, suggesting that its urban capacity for additional housing has largely been exhausted.

- Links to Coventry – this was a key factor influencing spatial strategy / site selection when preparing the adopted Local Plan, recognising that the aim was to provide for unmet need from Coventry, with the Inspector’s Report explaining: “...the four proposed MRS allocations at Ryton on Dunsmore, Binley Woods and Stretton on Dunsmore are close to the urban edge of Coventry and well connected to it by the strategic road network (via the A46 and A45).”¹⁷ There is no need to provide for unmet need from Coventry at the current time, but it remains the case that access to a higher order settlement is a key consideration, which primarily means access to Coventry and Rugby.

5.2.55. Finally, there is the possibility of departing from the settlement hierarchy through ‘transformational’ growth at a village and/or through a **new settlement**. With regards to the former possibility, a clear issue with any such strategy relates to impacts to the village but equally the village can benefit from extensive new infrastructure. With regards to the latter, there is only one new settlement being actively promoted, namely Lodge Farm (south of Dunchurch), which was an allocation within the adopted Local Plan until it was removed from the plan by the Inspector, whose report explained:

“In conclusion, the allocation would have relatively poor accessibility, particularly by non-car modes and in comparison with the other large scale allocations in the Plan. It would also be likely to have significant adverse effects on the landscape, again to a greater degree than is likely with the other allocations of comparable size, and cause less than substantial harm to the significance of heritage assets. Notwithstanding the justification set out in the Plan and the supporting evidence, there is not currently a need for this allocation to meet the Plan’s housing requirements. Indeed without it the Plan provides for an excess of housing land supply over the identified requirement of more than 17%. In the light of this, I find that the harm likely to be caused by development... would not be outweighed by the benefits.”

5.2.56. The Inspector’s Report also says much more besides, and the great majority of the concerns raised remain entirely applicable at the current time. However, matters regarding infrastructure delivery opportunities and also opportunities around potential bus services do move on over time. It should also be noted that matters did not transpire as the Inspector anticipated in the following regard:

“In terms of its contribution to the borough’s infrastructure requirements, I understand that the Lodge Farm development could [make] a contribution to the costs of the proposed new secondary school and spine road at South West Rugby. However... the SWR development on its own would be viably able to deliver the full strategic transport and education requirements necessary to support that development, including the spine road network and Homestead Link around Dunchurch. Therefore, the Lodge Farm allocation is not needed to support of the infrastructure requirements of the borough.”

5.2.57. With regards to other possible new settlement options, the key point to note is that none are being actively promoted and there is little if any case for the Council proactively seeking to identify options given the number of homes needed borough-wide and ample supply options at existing settlements. It can be noted that there are no known options for delivering a new settlement alongside a train station.

5.2.58. In **conclusion**, whilst there is a case for distributing growth broadly in line with the settlement hierarchy, and also for supporting growth at scale (i.e. one or more new strategic urban extensions), there is also a case for an element of ‘dispersal’ (specifically, a degree of dispersal over-and-above the adopted Local Plan) in order to diversify the overall portfolio of sites that delivers housing supply over the plan period, recognising that existing committed growth is strongly concentrated at strategic urban extensions to Rugby (SW Rugby, Houlton and Eden Park). Specifically, an element of dispersal would help to:

- Minimise delivery risk / maximise the potential to deliver on the housing requirement year-on-year over the plan period, including in the early years ahead of delivery at SW Rugby ramping-up;
- Support village vitality in terms of housing needs, infrastructure and services / facilities / retail;
- Support SME house builders;
- Minimise concerns around delivering on infrastructure objectives alongside affordable housing recognising that, whilst strategic urban extensions have merit in this regard in theory, in practice SW Rugby and Houlton have faced major viability challenges, e.g. Houlton is delivering zero affordable;
- Minimise pressure on Rugby, where there are infrastructure challenges (also air quality issues);
- Expedite plan-making, recognising that strategic sites require extensive work ahead of allocation.

¹⁷ The adopted Local Plan also directed two allocations to Wolvey (less well linked to Coventry), but one was a previously developed site not within the Green Belt and the other was a very small site (15 homes).

Infrastructure

- 5.2.59. The discussion above has already touched upon the importance of directing growth with a view to aligning with infrastructure objectives (i.e. ensuring good access to community infrastructure and supporting delivering of new / enhanced infrastructure in support of growth).
- 5.2.60. Particular key issues – as is quite commonly the case for local plans – are around directing growth mindful of schools and road / junction capacity issues and opportunities, as discussed below.
- 5.2.61. Beginning with schools capacity, a headline issue is **secondary school capacity at Rugby**, and specifically in the north of Rugby. The background is:
- On 12 July 2016 the Government announced approval of the “Ashlawn Free School”, and then the Department for Education through its LocatED body sought to identify land for the school in the north of Rugby. However, it failed to do so, and instead the funding was used to open a new school at Houlton.
- The opening of Houlton School has helped with the north Rugby shortfall of spaces in the short-term, as the school has filled up with many students coming from beyond the Houlton development. However, as of 1 April 2024 there were circa 4,000 homes remaining to be completed at Houlton, such that the ability of Houlton School to address the pre-existing shortfall is set to rapidly decrease (WCC education have referred to a 4-forms-of-entry Houlton ‘push back’). This means that a shortfall of 4FE in Rugby will arise because of the build out of Houlton, even if the Local Plan directed no further growth to the town.
- Adopted Local Plan Policy DS7 sought to remedy the issue by supporting a new secondary school on the Coton Park East allocation, with a parcel of 8.5ha reserved for 24 months following adoption of the plan in 2019. However, Warwickshire County Council elected not to take up that option, preferring instead a strategy of expanding existing schools, with a 2FE expansion of The Avon Valley School in west Rugby now planned. This strategy does not, however, deal with all the Houlton push-back. There will still be a 2FE deficit, again assuming that the Local Plan does not direct any further growth to Rugby.
- 5.2.62. The Coton Park East allocation did not come forward for housing and is now promoted for employment development, as discussed above. As such, a key issue for the local plan is identifying a site able to deliver a new secondary school in the north of Rugby. See further discussion in Section 5.4.
- 5.2.63. It is then also the case that **primary school capacity at villages** is a key issue with a bearing on spatial strategy, and specifically the distribution of housing growth across the Main Rural Settlements. There is a need to avoid children having to be bussed between villages to attend primary school, and so there is a need to distribute growth accounting for: A) existing headroom capacity at village primary schools; and B) potential to expand village primary schools. RBC Officers have liaised closely with the County Council on village primary school issues / opportunities ahead of the current consultation, and the understanding generated has been a key factor feeding into decision-making in respect of spatial strategy / site selection (as discussed below). However, the reality is that generating a firm understanding is challenging, and there will be a need for ongoing dialogue and detailed work.
- 5.2.64. There is also the possibility of supporting strategic growth at villages sufficient to deliver a new primary school (700+ homes, as rule of thumb). In practice opportunities are limited, including recognising that the opportunity is clearest where there is a single large site able to deliver a school (as opposed to a collection of sites that then have to go through a process of ‘land equalisation’). However, there is also the potential to explore making land and/or funds available to support primary school expansion.
- 5.2.65. Finally, with regards to **transport infrastructure capacity**, there are wide-ranging strategic factors, including relating to: the Strategic Road Network (SRN); the Rugby urban area (including cross-town movements, including secondary school-related) and the committed strategic urban extensions (primarily South West Rugby network improvements) and village-specific considerations (including problematic junctions, village centre traffic and in-combination impacts along certain road corridors).
- 5.2.66. Furthermore, there are key transport objectives that must feed into spatial strategy and site selection over-and-above accommodating growth related car movements / minimising traffic congestion, in line with the Warwickshire Local Transport Plan (LTP, 2023). In particular, there is a need to support modal shift away from the private car towards public and active transport, which means accounting for existing infrastructure capacity and also directing growth to realise infrastructure opportunities, e.g. cycle paths.
- 5.2.67. Strategic transport assessment (STA) will feed in at the next stage of plan-making (Regulation 19), but at this stage a range of key issues / opportunities are understood to some degree, and so must feed in.

Gypsy and Traveller accommodation needs

5.2.68. This is a key issue for the Local Plan, with a need to proactively identify sites/land for pitches in order to provide for needs as fully as possible, as understood from the Gypsy and Traveller Accommodation Assessment (2025). This has the potential to be a stand-alone consideration largely separate from wider spatial strategy focused on providing for housing and employment land needs; however, there are also cross-overs, including because both strategic housing, employment and mixed use sites can have the potential to deliver pitches (although there are also clear arguments in favour of stand-alone sites).

5.2.69. Every effort must be made to meet accommodation needs, as poor accommodation can be a barrier to maintaining the traditional way of life, can lead to tensions with settled communities and contributes to acute issues of relative deprivation, with Travellers on average having very poor outcomes across health, education and other indicators, as discussed [here](#). A recent [blog](#) prepared on behalf of the RTPi explained how failing to provide for Gypsy and Traveller accommodation needs in full is all too common.

5.2.70. In this regard, important context comes from the Inspector's Report for the adopted Local Plan:

"The Council explained that in preparing the Plan, no suitable sites were identified for further pitches through the call for sites... but Policy DS2 commits the Council to allocating land to meet the identified gypsy and traveller accommodation needs through a separate Gypsy and Traveller Accommodation Allocations Development Plan Document (DPD). This would enable the Council to adopt a more proactive approach to identify suitable sites... the Local Development Scheme confirms the Council's commitment to securing adoption of the DPD..."

In the meantime, Policy DS2 sets out criteria to guide planning applications... The Council explained that subject to satisfying these criteria, additional permissions could be granted for new sites or through extensions to existing sites, in advance of the DPD being adopted..."

... Ultimately, the overarching aim of Government policy in planning for the gypsy and traveller community is to ensure fair and equal treatment for travellers, in a way that facilitates their traditional way of life, while respecting the interests of the settled community. Whilst the Plan does not provide a supply of deliverable and developable sites to meet the accommodation needs of gypsies and travellers in full, I am satisfied that the combination of the criteria based approach in Policy DS2 and a Gypsy and Traveller Site Allocations DPD will enable the Council to meet [needs]."

5.2.71. As it transpires, the Gypsy and Traveller Accommodation Allocations DPD has not progressed, and it is now the case that a Gypsy and Traveller Accommodation Assessment (GTAA, 2025) identifies a need for *at least* 94 pitches (as discussed). A first port of call is two longstanding sites which currently have temporary planning permission (Top Park, Barnacle and Rosefields, Wolvey), but new supply from these sites will only provide for a small proportion of the identified need. See further discussion in Section 5.4.

Wider factors

5.2.72. There are many wider factors with a bearing on broad spatial strategy, including around:

- Landscape sensitivity – a character assessment (2025) explores varying issues and opportunities across three broad character areas – Dunsmore, Feldon and High Cross Plateau – and whilst it does not differentiate between these areas in terms of overall sensitivity, the study has informed a decision to designate one sub-area within the Feldon character area as locally significant.
- Green/blue infrastructure (GBI) – there is well-understood variation across the plan area, with particular sensitivities (also opportunities) associated with river stream corridors and a concentration of ancient woodland in the Ryton-on-Dunsmore / Binley Woods area (SE edge of Coventry).
- Green Belt – a Green Belt Assessment is ongoing, also accounting for latest Government policy on Grey Belt (NPPF para 148). Varying sensitivity is discussed further in Section 5.4.
- Built environment decarbonisation – whilst the Council has not set a local net zero target date ahead of the national target date of 2050 (a 2030 date has been set, but that is limited to the Council's own emissions), decarbonisation is a key local priority. Transport is a clear focus, but built environment decarbonisation must not be overlooked. In particular, it must feed into spatial strategy / site selection, as opposed to relying solely on development management policies that risk not being fully implemented on viability grounds (given recent experience of key sites have insufficient viability headroom even to deliver affordable housing, let alone net zero development).

5.3. Site options

- 5.3.1. This section considers the individual site options that are the building blocks for growth scenarios. Two stages of work are discussed below, both led by RBC Officers.
- 5.3.2. The starting point is Housing and Economic Land Availability Assessment (**HELAA**), which considers a long list of site options and for each one reaches a conclusion on whether the site is 'deliverable' (able to deliver within 5 years) or 'developable' (able to deliver within the plan period) after having determined that the site is both:
- Available and achievable – meaning there is a reasonable prospect of development accounting for development viability and assuming that the site will deliver on standard policy asks, e.g. affordable housing. This is not always clear cut, particularly where the land is currently in a profitable commercial use and recognising the costs and risks involved with seeking planning permission.
 - Suitable – the aim is to reach a high level conclusion in light of a basic set of standard criteria. There is a clear recognition that sites deemed to be suitable through a HELAA will not necessarily be suitable for allocation through the Local Plan, in light of: A) more detailed analysis of the site, as discussed below; and B) consideration of the site in combination with others (at a range of scales, from the very local to the borough-wide), as discussed in Sections 5.4 and 5.5.
- 5.3.3. 261 site options fed into the HELAA, primarily comprising sites submitted to the Council through a 'call for sites', but also including some other sites identified by officers.
- 5.3.4. 149 were then ruled out through the assessment for one or more of the following reasons: (1) duplicate, (2) not available, (3) too small to meet HELAA minimum size threshold, (4) extant planning permission, (5) high flood risk affecting a significant proportion of the site (6) ecology where a significant proportion of the site is covered by priority habitats or designated sites, (7) lack of the potential to create suitable vehicular access, (8) locational sustainability if (for residential) the site is disconnected from existing settlements, (9) settlement character if the development of the site would be at odds with the existing pattern of development, where possible smaller cuts of larger sites were taken forward.
- 5.3.5. The total housing and employment land capacity of the 112 site options passing through the HELAA is far in excess of what is required under any reasonable scenario, such that site options ruled out at this stage need not be given any further consideration below, within Section 5.4.
- 5.3.6. Focusing on the 112 site options passing through the HELAA, Officers then subjected these sites to **detailed site assessment**. This included:
- Site visits
 - Transport assessment by consultants and consultation with National Highways on sites close to SRN
 - School place modelling and planning advice from Warwickshire County Council.
 - Landscape sensitivity assessment undertaken for all sites including site visits (undertaken by consultants for larger sites and by Officers for smaller sites).
 - Ecological assessment of select sites (undertaken by consultants).
 - Heritage assessment of select sites (undertaken by consultants in collaboration with RBC Officer).
 - Consider development related opportunities to deliver public benefit, e.g. community infrastructure.
- 5.3.7. Circa 50 site options were progressed following the detailed site assessments, and the total housing and employment land capacity of these sites is far in excess of what is required under any reasonable scenario, such that these sites can reasonably be a focus consideration below, within Section 5.4.
- 5.3.8. However, site options judged to perform less well are also given proportionate consideration in Section 5.4 as a check and challenge, including recognising that site options judged to perform poorly when viewed in isolation can, on occasion, be found to perform more strongly once consideration is given to the possibility of the site coming forward in combination with other sites as part of a strategy.
- 5.3.9. In **summary**, the two stages of work described above generated a shortlist of site options for further consideration in Section 5.4, which explores site options in combination by sub-area.

5.4. Settlement (etc) scenarios

Introduction

5.4.1. Discussion has so far focused on A) 'top down' consideration of strategic factors (growth quantum and broad spatial strategy); and B) 'bottom-up' consideration of site options. The next step is to explore how sites might be allocated in combination ('scenarios') in order to deliver on strategic objectives for:

- Individual settlements (housing focus)¹⁸
- Employment land needs borough-wide
- Gypsy and Traveller accommodation needs borough-wide

Methodology

5.4.2. Focusing on individual settlements, the aim is to draw together the 'top down' and 'bottom up' inputs discussed above before concluding on scenarios to take forward to Section 5.5, where the aim is to combine settlement scenarios to form borough-wide RA growth scenarios for appraisal and consultation.

5.4.3. With regards to employment land and Gypsy and Traveller accommodation the situation is more straightforward in that there is simply a need to reach a conclusion on RA growth scenarios.

5.4.4. The aim here is not to present a formal appraisal, but rather to contribute to "an outline of the reasons for selecting" the RA growth scenarios ultimately defined in Section 5.5. Accordingly, the discussions are systematic only up to a point, with extensive application of discretion and planning judgment. The aim is not to discuss all site options to the same level of detail, but rather to focus attention on those *judged to be more marginal*, i.e. where the question of allocation is more finely balanced.

5.4.5. As such, site options are discussed in broad order of performance as understood on the basis of work presented in Section 5.2 (which allows for an understanding of broadly how much development is needed borough-wide and how it should/might be distributed) and Section 5.3 (which signposts to officer-led workstreams that have looked at the merits of site options in isolation at the Borough scale).

5.4.6. This section is structured as follows:

- Settlement scenarios
- Employment land scenarios
- Gypsy and Traveller accommodation scenarios

Settlement scenarios

5.4.7. All of the higher order settlements (main rural settlements) are considered in turn, before consideration is given to lower order settlements (rural villages) and then finally the possibility of a new settlement.

5.4.8. To reiterate, the focus here is on housing options / growth scenarios.

Rugby (inc. Houlton and Newton)

5.4.9. As discussed in Section 5.2, there is a need to direct a good proportion of growth to Rugby in line with the settlement hierarchy, although equally there is a clear case for directing a more modest proportion of growth to Rugby relative to the adopted Local Plan (2019). What this means in terms of total growth quantum is difficult to pin down, but Box 5.2 recaps the situation in respect of needs borough-wide.

5.4.10. With regards to broad spatial strategy, Section 5.2 explains primary considerations as: A) there is a need to deliver a new secondary school; and B) there is a strong case against allocating a further strategic urban extension. These two factors are somewhat conflicting, because it is typically strategic urban extensions that are able to deliver a new secondary school, but this is a matter to explore further below.

¹⁸ A key aim is to ensure vision-led planning, recognising that settlements will typically be a scale of particular interest to key stakeholders, in terms of issues/opportunities and options/alternatives.

Box 5.2: Recapping development needs

Development needs in respect of both housing and employment land are discussed in Section 5.2, but it is worth summarising the situation here, as this is crucial information to inform definition of settlement growth scenarios.

Beginning with **housing**, the situation is as follows:

- Local Housing Need (LHN) is 12,978 new homes over the plan period. There is a clear case for setting the housing requirement at this figure, although there is also a case for remaining open to higher growth.
- It is established practice to identify a supply of land able to deliver this figure plus a 'buffer', as a contingency for unforeseen delivery issues. As a broad rule of thumb, the buffer might be between 5% and 10%, although there can be a case for a larger buffer if the identified supply includes reliance on sites with high delivery risk, e.g. urban sites or large strategic sites (e.g. recalling the recent experience of SW Rugby).
- With a buffer, there is an overall need to identify supply for *at least* 13,600 new homes.
- Around 9,746 homes are deliverable by 2045 on land that was allocated for development under the current local plan 2011-2031 and/or has planning permission. Also, a windfall supply of 1,050 homes can be assumed, based on past delivery averages of 50 homes per year (and without double counting permissions).
- Therefore, there is a residual need to allocate sites to deliver **at least 3,000 new homes**.

With regards to **employment land**, the headline is a residual need (i.e. after having accounted for existing committed sites) for 202.5 ha or (more accurately) **740,000m² floorspace**. However, within this there is also a need to factor in needs for specific types of employment land / the specific needs of various sectors. Also, cut-off point for accounting for planning permissions (31st March 2024) a large site for 274,388 m² has gained permission (Crown Fields Farm, Ansty (Fraser Group Headquarters)) which reduces the residual need figure.

- 5.4.11. A starting point is the town centre and wider urban area, where the HELAA/Stage 2 Site Assessment (as discussed above, in Section 5.2) has identified 195 homes capacity from three sites (**Site 62, Site 122 and Site 332**) and there is no basis for calling this conclusion into question for the purposes of defining RA growth scenarios at the current time (but these sites are considered further in Part 2 of this report).
- 5.4.12. With regards to urban edge sites, a starting point is **Site 59** at the northeast extent of the town, because this site is likely able to deliver a secondary school alongside just 240 homes, which is highly unusual. The landowner is understood to be committed to making land available for the school, and initial work has determined that the site is likely suitable for a school to meet the established need that exists in the north of Rugby (as discussed in Section 5.2). However, there are some challenges, relating to topography, ridge and furrow / archaeology, power lines and access / connectivity to Rugby.
- 5.4.13. There is also the matter of impacts to Newton, but the village has limited historic environment sensitivity, and a school might secure something of a buffer to Rugby (and benefit families in the village). If a school to serve north Rugby were not to be delivered here then it is difficult to envisage an alternative location, beyond land to the north west, which is questionable as an option (discussed below). Otherwise attention focuses on Clifton-upon-Dunsmore, but this is a more sensitive village in historic environment terms, much of the topography here is sloping and links to the north of Rugby are poor.
- 5.4.14. Nearby to the north is then **Site 87**, which is located adjacent to Newton, and which comprises previously developed land (PDL) / brownfield land (farm buildings; not shown on the pre-WWI OS map). Newton is a 'rural village' in the settlement hierarchy but has comfortably the highest 'settlement score' of any of the rural villages, as understood from the Rural Sustainability Study (2024). This is largely on account of its good links to Rugby, and the village would also clearly benefit from a new secondary school to the south (i.e. at Site 59, as discussed above); however, there is a need to consider how links west to Rugby might be improved (equally a consideration for Site 59). Another consideration is that the landowner has promoted a larger scheme to include greenfield land, and so the question arises as to whether there is a case for planning comprehensively for growth west of Newton, with a view to securing benefits (e.g. connectivity; feasibly a primary school) and addressing constraints (e.g. the former railway line to Lutterworth/Leicester is a Local Wildlife Site, LWS).
- 5.4.15. Moving to the southeast edge of Rugby, there is broadly a strategic case for supporting growth in this area, given constraints affecting broadly the western part of Rugby's urban edge (as discussed below), and given proximity to Houlton, extensive employment land and anticipated Rugby Parkway station.

- 5.4.16. Beginning with **Site 338** at Houlton, this is an existing employment allocation, but is now being promoted for residential, which does not generate significant concerns, given the extent of employment land nearby. The safeguarded land for Rugby Parkway Station is adjacent, such that the site should be suitable for higher density development (250 homes). Overall this site performs very strongly.
- 5.4.17. There is then a cluster of site options at the southeast edge of Rugby itself, where there is broadly a need to ensure comprehensive growth focused on both realising opportunities and addressing landscape constraint, given that land in this area falls away quite notably from the urban edge towards the valley of Rains Brook / Oxford Canal, beyond which is the raised ironstone landscape of Daventry Borough, including the historic ironstone edge villages of Barby and Kilsby. Matters have been examined through a Landscape Study, with the conclusion reached that there is support for:
- **Site 334** (400 homes) – comprises part of a larger promoted site (Site 146), but the smaller site boundary has been drawn accounting for landscape constraints. It is recognised that a larger site could potentially deliver additional infrastructure benefits, but a 400 home scheme would enable land to be made available for potential expansion of the adjacent primary school. There is also a land availability issue at the current time, with a bearing on the potential to achieve active travel links.

A smaller site is also available to the west (**Site 16**) but performs relatively poorly in landscape terms, including given potential to achieve effective containment, i.e. there would be a risk of future 'sprawl'.
 - **Site 40** (125 homes) – again is judged to be a less sensitive site in landscape terms, albeit there are sensitivities including given the adjacent Oxford Canal (although, on the other hand, the site can support some targeted enhancements). A field to the west has not been promoted as available, but in practice might be considered as a potential location for development alongside Site 40.
- 5.4.18. Moving to the west, there is only one further non-committed available housing site option associated with the southern edge of Rugby, namely **Site 122** (80 homes), which is a strongly performing site, although development is contingent upon securing an alternative location for Old Laurentians RFC.
- 5.4.19. Through the current consultation landowners might helpfully suggest further potential site options along the southern edge of Rugby, including within the Barby Road area given proximity to the town centre, albeit this is clearly a valued green wedge and gateway to the historic town.
- 5.4.20. Moving north there are several site options associated with Long Lawford, which are discussed below, and then there is a series of small site options associated with Newbold on Avon, which is a historic village associated with a meander in the River Avon and the Oxford Canal, which was linked to Rugby by a series of developments in the 20th century. In this area **Site 75** (20 homes) is the strongest performing site, although it comprises amenity greenspace for a ~1960s housing estate and there is a view across the site to the railway bridge over the River Avon. The only other site of note is then **Site 102** to the north, which is a larger site. The site is suitable site in several respects, but the issue here is achieving suitable access given a narrow road bridge over the Oxford Canal.
- 5.4.21. The final housing site option for consideration at Rugby is then **Site 114**, which would deliver a mixed use North West (NW) Rugby strategic urban extension (SUE) involving perhaps 3,000 homes (~1,800 in the plan period), an extension to Swift Valley / Glebe Farm Strategic Employment Area and extensive new and upgraded infrastructure to include a secondary school. This is the only option for a strategic urban extension through the current Local Plan and would deliver a secondary school to address an existing capacity issue (i.e. a lack of capacity in the north of Rugby, as discussed) in the context of there being an element of uncertainty regarding deliverability of a new secondary alongside Site 59 (discussed above). As such, it does warrant further detailed consideration at this stage in the plan-making process. However, there are a wide range of constraints / issues, which are explored further below.
- 5.4.22. In **conclusion**, the emerging preferred approach involves commitments (which are extensive) plus 1,255 homes from nine new allocations. Additionally, there is a need to test the possibility of a NW Rugby SUE (1,800 homes in the plan period) and it is reasonable to assume that supporting this site would allow for reduced expansion elsewhere. On balance, it is considered appropriate to focus on the two largest emerging preferred urban extensions bar Site 338 at Houlton (which is strongly supported), namely Site 334 to the south (400 homes) and Site 59 to the northeast (240 homes plus a secondary).

Binley Woods

- 5.4.23. This is the first of the Main Rural Settlements for consideration (going in alphabetical order).
- 5.4.24. The village dates from the early to mid-20th century when plots of land for development were made available on an area of woodland / common-land. Accordingly, the village has low historic environment sensitivity and a distinct character and built form, having more-or-less not expanded beyond its original extent, although a small allocation from the adopted Local Plan (2019) is now under construction.
- 5.4.25. The village benefits from excellent road connectivity to Coventry and the A46, although the corollary is that the A428 passes through the village. There is Green Belt sensitivity given proximity to Coventry, and there is also biodiversity sensitivity given nearby ancient woodlands. Primary school capacity is not a major issue (unlike at other villages) in that there is existing capacity and/or potential for expansion. Binley Woods has an overall settlement score of 47, such that it is the second best served village.
- 5.4.26. Overall there is a strategic case for exploring growth options, but site options are judged to perform poorly. Attention focuses on **Site 45**, which is a large site to the north of the village, however: achieving good access would be challenging; the A428 is a barrier to reaching the primary school; there would be a concern regarding achieving effective landscape / Green Belt containment; the site is safeguarded for minerals extraction; and there is generally little strategic case for growth at this scale at Binley Woods (the village would benefit from new community infrastructure, for example a neighbourhood hub, but this would not be an appropriate location given it is separated from the village to the south by the A-road). There is also a need to consider growth quantum from a primary school perspective, i.e. seek a modest quantum that can be accommodated in existing capacity or a large quantum that can fund an expansion.
- 5.4.27. The other two site options of note are then: **Site 54**, which would involve ribbon development along the A428 reducing the landscape gap to Brandon / Wolston; and **Site 34** which is supported for a community use, namely the restoration of Coventry Stadium for speedway and stock car racing and other motor sports together with other community uses (an element of enabling housing could feasibly be explored).
- 5.4.28. A final possibility is the sector of land to the south of the village, where the land has not been made available, but development could be relatively well contained in landscape / Green Belt terms. However, it appears that achieving good access (for cars and pedestrians/cyclists) would be highly challenging.
- 5.4.29. In **conclusion**, only one reasonable growth scenario is taken forward, namely the emerging preferred approach of not allocating any new sites for development.

Brinklow

- 5.4.30. Brinklow is a historic rural village with a designated conservation area and a large scheduled monument (Brinklow Castle). In some respects there is limited strategic case for growth; however, there is one notably strongly performing site, namely **Site 337** (75 homes) to the east, which is predominantly PDL, well-contained in landscape / Green Belt terms and adjacent to the village centre. There is historic environment sensitivity as the edge of the site includes a Grade II listed farm building and intersects the conservation area, and biodiversity constraint is a further consideration as the northern edge of the site comprises a LWS, but there is confidence in the ability to account for this constraint through design etc.
- 5.4.31. The next site for consideration would then involve expansion to the south, namely **Site 315** (340 homes). The site relates very well to the settlement edge / village centre and has the potential to be well-contained in landscape / Green Belt terms, including noting a narrow flood zone / stream corridor (designated as a LWS, as most stream corridors are in the Borough). Also, as a larger site that is flat and largely free from constraints there should be good development viability with positive implications for affordable housing delivery. The site could deliver some limited benefits to the village, to include a children's play area, but clearly there is a need to question whether this scale of growth is appropriate.
- 5.4.32. The other key consideration is primary school capacity, with the school site split between Brinklow and Monks Kirby (~5km distant), but primarily at Monks Kirby (years 1 to 6, with only reception at Brinklow). This is clearly a non-ideal situation, but there is a desire to support the Monks Kirby school site, which is currently experiencing a dwindling role, rather than seeking to deliver a new school at Brinklow (which, in any case, would require a large quantum of growth, and likely a large strategic site). The school at Monks Kirby can likely be expanded, and there is the potential to consolidate the school on one site.

- 5.4.33. In this context, allocation of Site 315 (in addition to Site 337) has merit as the site should be well-placed to contribute funding aimed at expanding the Monks Kirby school site.
- 5.4.34. Two further options of note are **Site 24** and **Site 111**; however, the former is not well-contained in landscape / Green Belt terms and this sector of land may contribute to the setting of the conservation area, whilst the latter site was deleted as an allocation by the Inspector at the final stage of preparing the adopted Local Plan (see a detailed discussion across paragraphs 204 to 214 of the Inspector's Report).
- 5.4.35. In **conclusion**, the emerging preferred approach is to allocate Site 315 and 337 for 415 homes in total, including with a view to delivering on primary school objectives for the village. Site 315 clearly warrants ongoing scrutiny, but given the primary school issue / opportunity it is a challenge to define alternative growth strategies for the village. On balance it is considered appropriate to test allocation of just Site 337, but there are potentially other scenarios to consider involving allocation of Site 34 and/or Site 111.

Clifton-upon-Dunsmore

- 5.4.36. There is a strategic case for growth here as a Main Rural Settlement located outside of the Green Belt and well-linked to Rugby. However, the village has a relatively low settlement score (36).
- 5.4.37. Work to explore site options (Section 5.2) has identified three emerging preferred options, which are all located to the north of the village:
- **Site 202** (80 homes) – is potentially the strongest performing of the three sites, as it is separated from the conservation area, generally well located in built form / landscape terms (although there is a need to question whether the site should utilise the entire field, with a view to a comprehensive scheme) and, as a larger site, is able to deliver transport upgrades and a children's play area.
 - **Site 129** (60 homes) – is located nearby to the east and, like Site 202, benefits from being a relatively flat site. Farm buildings located to the north may provide a degree of containment, but the conservation area is adjacent to the west, and there is poor containment to the south, where Site 83 is being promoted for 180 homes (and open space). Site 83 is also potentially sensitive in that it comprises the former landscaped grounds of Clifton Hall (albeit not listed; see [historic mapping](#)).
 - **Site 307** (10 homes) – is a more challenging site as it is located to the west of the village, where the landscape falls away quite steeply towards the Avon Valley. As a small site there are limited concerns, and site specific policy is set to require *“solely rear gardens along the western boundary of the site would not be supported to enable a more attractive settlement edge”*, but it is noted that a larger area of land has been promoted as available, and so there is a need to plan with a long term perspective. Access is on a bend on a minor residential road but is judged to be suitable.
- 5.4.38. These sites in combination would deliver 150 homes, which is broadly the number of homes that can be accommodated without breaching the capacity of the village primary school, which is unable to expand.
- 5.4.39. The next port of call is then the option of expansion to the southwest of the village, where the land owner has proposed a large site for 700 homes to include a new primary school (**Site 238**), but has also proposed two smaller options, involving around 350 or 150 homes. The first thing to say is that there is no case for the middle option, including on the grounds of primary school capacity. With regards to the largest option (Site 238), this may warrant ongoing consideration, however: there is no clear strategic case for growth at this scale; there would be relatively poor links to the existing village; there would be landscape impacts (including noting a public footpath linking the village to the Clifton Brook / Oxford Canal corridor); and there would be a need to carefully consider performance in terms of transport and traffic factors (noting seemingly no potential to link directly to the new Houlton Way).
- 5.4.40. As such, attention focuses on the 150 home option (**Site 335**), which could be delivered in place of the three emerging preferred allocations discussed above (Sites 129, 202, 307). The views of the Parish Council and others on these two alternative approaches to growth at the village are welcomed through the current consultation; however, at the current time it appears that the emerging preferred approach (Sites 129, 202, 307 to the north) is clearly preferable to the alternative of Site 335 to the southwest. This is largely on landscape grounds, given Clifton-upon-Dunsmore's characteristic hilltop location, but it is also the case that the site does not relate very well to the village (although the school and village centre would be within reasonable walking distance, plus the site is relatively well linked to Rugby), plus there would be a concern regarding further piecemeal growth to the east over time, leading to opportunities missed to secure infrastructure benefits alongside delivery of new homes.

Dunchurch

- 5.4.41. Dunchurch is a historic village closely linked to an expanding Rugby and the M45/A45. The committed SW Rugby SUE is nearby, and a focus of detailed work has been on ensuring a landscape gap to Dunchurch and avoiding traffic impacts / realising transport opportunities.
- 5.4.42. There is broadly a case to be made for focusing growth to the west of the village given topography / landscape and historic environment sensitivities to the east of the village. **Site 37** is a notable site option to the east of the village, but this is a sloping site with the parish church / conservation area uphill to the west, plus achieving good access onto the B4429 could prove challenging.
- 5.4.43. Focusing attention on land to the west of the village, a first port of call is **Site 90**, which is considered to be a strongly performing site, with capacity for 30 homes. **Site 97** is then a large irregularly shaped site, where three options have been considered: development in full for 360 homes, with access from both the B4429 and Sandford Way (a residential road at the western edge of the village); B) a smaller scheme with access solely from Sandford Way (**Site 41**); and C) a 180 home scheme with access from the B4429 (Site 341). On balance Site 341 is preferred, because Sandford Way is not suited to significant additional traffic, and also noting a surface water flood zone at the western edge of Dunchurch. However, the proposed scheme (in combination with Site 90) would extend Dunchurch west along the B4429, and there is a need to ensure a comprehensive approach to growth, i.e. avoid a situation whereby there is ongoing pressure to develop the remaining parts of Site 97, with a resulting piecemeal development with opportunities missed to maximise infrastructure benefits for the village.
- 5.4.44. Allocation of Sites 90 and 341 would deliver 210 homes in combination, whilst there is capacity at the local primary school to accommodate ~250 (there will also be new primary school capacity nearby at South West Rugby, but there is not thought to be any significant headroom capacity).
- 5.4.45. In turn, it is noted that there are two small available sites to the north of the village that come into contention for allocation, namely **Site 38** and **Site 74**. However, these sites are constrained in historic environment terms, as they are located adjacent to / either side of the historic gatehouse and tree-lined drive for Bilton Grange, which is a Grade II listed Registered Park and Garden.
- 5.4.46. Final points to note are as follows:
- A large area of land is available to the east of the village (Site 91), but strategic growth in this area is not supported including given topography / landscape factors and the committed SW Rugby SUE.
 - Numerous sites are being promoted for employment to the west of Dunchurch (discussed below).
 - Lodge Farm has already been introduced as a new settlement option to the south of Dunchurch and is discussed in further detail below. Potential traffic through the village is a key consideration.
- 5.4.47. In **conclusion**, in addition to the emerging preferred approach, namely allocation of Sites 90 and 341 in combination for 210 homes, there is a case for exploring a lower growth scenario involving just Site 90. However, on the other hand, there are no major concerns with Site 341 and there is a strategic case for supporting growth at Dunchurch, given a strong settlement score and a location outside the Green Belt. On balance only the one growth scenario is taken forward (i.e. the emerging preferred approach).

Long Lawford

- 5.4.48. Long Lawford is located in the Green Belt near adjacent to the west of Rugby. There is a historic core to the north of the railway line at the western extent of the village (but just two listed buildings and no conservation area) and then the village has expanded east (towards Rugby) and also to the south of the railway line over recent decades, including significant growth over recent years.
- 5.4.49. A settlement score of 38 is 'middling' amongst the main rural settlements but there is good capacity at the village primary school (unlike at certain other potential locations for growth).
- 5.4.50. Attention focuses on land to the south of the village, with no significant sites having been promoted as available to the north (and it is noted that there is a flood risk zone to the north west, whilst land to the north comprises a sensitive landscape associated with Holbrook Grange and the River Avon Valley).
- 5.4.51. The majority of land to the south (i.e. south of the A428) is promoted as available, broadly comprising two strategic site options either side of Bilton Lane.

- 5.4.52. Beginning with land to the west of Bilton Lane, four overlapping parcels of land have been considered, but the preferred configuration of growth is **Site 316**, which could deliver 400 homes. There would be the potential to deliver some targeted new community infrastructure, to include a small convenience shop and potentially land for a GP surgery, and it is understood that there is good potential to deliver a pedestrian crossing across the A428 and a high quality active travel link to the village centre via the site that is currently under construction near adjacent to the north. Rising topography to the south would assist with securing a degree of containment in Green Belt terms, but the situation is nonetheless challenging in this regard, noting that the site boundary does not align with field boundaries.
- 5.4.53. Allocation of Site 316 for 400 homes is the emerging preferred option.
- 5.4.54. **Site 253** to the east is then considered to perform less well for two reasons, namely: 1) Green Belt noting that this land is not likely to comprise Grey Belt on the basis of contributing to avoiding the sprawl of Rugby as a large built-up area; and 2) the site would not link as well to the village centre. However, it is recognised that the site has been promoted for just 150 homes, with extensive land made available for green / open space and a primary school (but there is no clear need for a new school here).
- 5.4.55. In **conclusion**, in addition to the emerging preferred approach (Site 316 for 400 homes) it is considered reasonable to test the possibility of no allocation at Long Lawford. This is primarily a reflection of Green Belt sensitivity ahead of a Green Belt Assessment that will be published later this year and will identify land within the Green Belt that is in fact Grey Belt. With regards to comprehensive growth involving additional allocation of Site 253, this is ruled out as unreasonable on balance. There is no clear case for large-scale growth of this nature at Long Lawford although, on the other hand, it is recognised that allocation of Site 316 would likely increase pressure for additional allocation of Site 253 down the line.

Ryton-on-Dunsmore

- 5.4.56. The village is located on the A45 well-linked to Coventry and extensive employment land, plus further employment land in this area is an option at the current time (discussed below). The village including its historic character is heavily affected by the A45, although there is a prominent Grade II* parish church.
- 5.4.57. Attention focuses primarily on land to the south of the A45, but briefly north of the A45: Site 71 to the west is being promoted for employment (given a location opposite Prologis Park); and it is difficult to envisage expansion to the east given a flood risk zone, a large LWS and the parish church. There is, however, the possibility of employment land to the east of Ryton / north of the A45 (discussed below).
- 5.4.58. Focusing on land to the south of the A45, a first port of call is **Site 100** (35 homes), which is a designated as a Local Wildlife Site (LWS) but also an identified reserve site for housing in the made Ryton-on-Dunsmore [Neighbourhood Plan](#) (2021). Also, there is recent planning history, with an application recommended for approval but then refused at committee on the ground of car parking. The site is otherwise very suitable for development, given built form along three of its edges and woodland along the final edge, and is an emerging preferred option at the current time.
- 5.4.59. The other main non-committed site that has been promoted as available and is in contention for allocation is then **Site 29** (63 homes) but achieving access would involve demolition of two homes. Also, there would be merit in considering this site in conjunction with land to the east, which has not been promoted as available, but which potentially represents the primary residential expansion option for the village. Across Site 29 and land to the east there appear to be several land ownership parcels.
- 5.4.60. Furthermore, as part of any residential expansion to the east there would be a need to consider the future of **Site 305**, which is located adjacent to the north and which comprises a Grade II listed Registered Park and Garden, namely Ryton House. The Grade II listed house is in ruin, and the grounds are in poor condition, such that the Registered Park and Garden is on the national [Heritage at Risk Register](#) and its vulnerability is classified as “high” (with a statement that its “future is uncertain”).
- 5.4.61. The site has previously been promoted as available, but it is not clear that it is currently actively being promoted for residential, with its current owner understood to be a scrap metal company. The made Neighbourhood Plan supports only heritage-led “sympathetic limited development”.

5.4.62. In **conclusion**, there is clearly a need for ongoing scrutiny of Site 100 as an emerging preferred allocation, but as a small site there is not necessarily a reasonable need to formally explore a growth scenario whereby it is not allocated (rather, the merits of the site can be further considered in Part 2 of this report). A bigger question is the possibility of strategic expansion to the southeast, including noting the possibility of heritage enhancement and strong landscape / Green Belt containment. This is not currently a reasonable option to explore, including given land availability, but is a potentially a matter for ongoing consideration (as part of which primary school capacity would need to factor-in, with it being the case that there is some existing headroom capacity, but seemingly no potential for expansion). It is also noted that the village currently has quite a low settlement score (36), such that growth aimed at delivering targeted new community infrastructure could potentially be an option to explore.

Stretton-on-Dunsmore

5.4.63. The village is located to the east of Ryton-on-Dunsmore, near equidistant between Coventry and Dunchurch, and benefits from having good access to the A45 but being slightly set back from the road. There is a conservation area at the southwest extent of the village, but also a wider area with strong historic character. There is primary school capacity to support around 150 homes over-and-above commitments (assuming the objective is to avoid children having to travel to a school).

5.4.64. A first port of call is **Site 6**, which is a very small site with capacity for just 3 homes. There are then three better performing sites in contention for allocation:

- **Site 81** (40 homes) – to the northeast is considered to be the most strongly performing. It relates well to the settlement edge, has the potential to be quite well-contained given a mature / historic field boundary, and the proposal is to deliver a significant new area of open / greenspace.
- **Site 134** (125 homes) – is the next best performing site on balance. There is an adjacent existing permitted site, and, in this context, Site 134 should be able to deliver a well-rounded new settlement edge. However, there is a slight concern regarding further piecemeal expansion / sprawl, which is important from a Green Belt perspective and because of a need to ensure that growth is comprehensive / undertaken with a long term perspective, with a view to maximising opportunities to secure investment in infrastructure and the benefits of growth more widely.
- **Site 26** (34 homes) – arguably relates very well to the settlement edge (unless the aim were to be to retain / enhance a green wedge in this area, noting the proposal above regarding a new public open space within Site 81, two public rights of way and generally a high density of historic field boundaries in this area). However, an issue is that access would need to be achieved by crossing a small brook.

5.4.65. In **conclusion**, there is support for allocating Sites 6, 81 and 134 for a total of 168 homes, although this number will require further consideration given the aforementioned capacity at the village primary school. As discussed, Site 26 also warrants ongoing consideration, and there is generally a case for considering long term / comprehensive growth options, feasibly to include an expanded primary school; however, there is not considered to be a reasonable alternative growth scenario at the current time.

Wolston

5.4.66. Wolston is a historic village closely associated with the Avon valley (along which there is a concentration of higher quality agricultural land). It is located to the east of Coventry, but unlike other villages in this area (Binley Woods, Ryton-on-Dunsmore and Stretton-on-Dunsmore) Wolston is not directly linked to an A-road. There is, however, a good local offer such that the village has a high settlement score (45).

5.4.67. There are several site options that are potentially suitable for allocation when viewed in isolation, but a major issue affecting the village is primary school capacity. Specifically, there is no capacity at the school and likely no potential for expansion, such that directing growth to the village would mean that children need to travel to primary school at Ryton-on-Dunsmore or Binley Woods.

5.4.68. This being the case, the emerging preferred approach involves just one small allocation for 15 homes, namely **Site 39**. This is considered to be a strongly performing site, and it is also noted that there is the potential to bring the site forward as self-build housing or for older persons housing.

5.4.69. A next port of call is **Site 136**, but there is no potential for allocation given the primary school issue.

- 5.4.70. In **conclusion**, there is just one reasonable growth scenario, which involves low growth. Unlike certain villages discussed above, it is difficult to envisage the possibility of strategic growth in order to deliver targeted benefits, i.e. new primary school capacity.

Wolvey

- 5.4.71. Wolvey is a notably small main rural settlement with a low settlement score (36), and is also notable on account of being located in the north of the Borough, linking much more strongly to Hinckley, Nuneaton and Coventry than to Rugby. It is a historic village associated with the River Anker, and there is a small conservation area, but the conservation area includes just one Grade II listed building, and the village as a whole contains just three listed buildings. The village is distant from an A-road, similar to Brinklow, although Brinklow is more constrained in historic environment terms.
- 5.4.72. The majority of the land surrounding the village is being actively promoted for housing growth, and three of the site options are considered to have merit in terms of being subject to limited constraint and/or on the basis of being able to deliver targeted benefits beyond new homes.
- 5.4.73. Beginning with **Site 309** (150 homes) to the west, this is arguably the best performing site because it is subject to limited constraint and is well-contained in landscape / Green Belt terms. However, the site would deliver limited benefits beyond new homes (river corridor enhancements should be explored).
- 5.4.74. The next-best site is then potentially **Site 84** to the northeast (60 homes). There is a very strong proposal to develop only a small proportion of this site, with the bulk of the site delivered as an area of riverside parkland and a play area, and the village would certainly benefit from this new green / blue / community infrastructure. However the housing area would deliver a 'phase 2' of a scheme currently under construction (such that the question arises as to whether even greater benefits to the village could have been secured if the two phases had been planned for comprehensively), does not relate well to the settlement edge and would not be well-contained in landscape / Green Belt terms
- 5.4.75. The final key site for consideration is then **Site 96** to the south of the village (500 homes). This would involve a major expansion of Wolvey, but there is a clear case for taking this approach, namely an opportunity to deliver targeted enhancements in the form of an expanded primary school and a neighbourhood hub likely to include a nursery, a small supermarket and other small retail units. The site is not very well-contained in landscape / Green Belt terms, but as a large site there should be good potential to work with land-owners on site masterplanning to ensure a comprehensive scheme.
- 5.4.76. There are also two other sites of note, but both are small sites that need not be dwelt upon further at the current time. Firstly, **Site 107** (10 homes) is peripheral to the village (but close to Site 84) and may have some sensitivity a location at the junction of two historic roads (see [historic mapping](#), which also suggests potential archaeological sensitivity), noting dense field boundaries and given the nearby river corridor. Secondly, **Site 104** (~15 homes) would involve demolition of a house to achieve access but might alternatively be considered as part of a comprehensive scheme linked to Site 96.
- 5.4.77. In **conclusion**, the emerging preferred approach involves support for large-scale growth to the south (Site 96) to deliver a primary school expansion, which then also enables further growth at Site 84 (to the west) and Site 309 (to the northeast). However, there is also a clear need to test a growth scenario that does not involve strategic growth to the south of the village (plus ongoing consideration should be given to lower and higher growth options to the south of the village). On balance it is assumed that Sites 84 and 309 would still be allocated under this scenario, but primary school capacity could be an issue.

Rural villages

- 5.4.78. The limited strategic case for allocation at rural villages has already been introduced in Section 5.2, and this limited strategic case is now even clearer after having considered supply options at higher order settlements here within Section 5.4. However, it is recognised that: A) certain rural villages have a higher settlement score than others; B) certain villages may be associated with a strategic case for modest growth to meet localised housing needs, deliver targeted infrastructure and/or to generally help to maintain village vitality; and C) there are a number of available site options that are suitable when viewed in isolation, i.e. blind to the strategic context. Overall, attention focuses on:
- Church Lawford – is located on the A428 and has limited historic environment sensitivity. There are three available site options and the southern two appear reasonably unconstrained and well-linked.

- Shilton – there is the potential for significant growth to the north of the village at Site 56 (e.g. increasing the size of the village by 50% or more), but there is no clear strategic case for this. A small scheme could be delivered within Site 56 (namely Site 313) but then there would be a risk of further piecemeal growth over time with opportunities missed to secure benefits to the village.
- Birdingbury – a notably rural village in the south of the Borough. Site 116 appears to be notably unconstrained and well linked to the village / well contained within the landscape.

5.4.79. Overall, whilst there are options warranting further ongoing consideration there is no clear reasonable growth scenario involving allocation at any of the rural villages at the current time. There will be the potential to add one or more rural village allocations prior to plan finalisation should this be deemed appropriate in light of consultation responses received, including from parish councils.

New settlement options

- 5.4.80. There is only one realistic new settlement option that is being actively promoted, namely Lodge Farm (which has already been introduced above), and there is little strategic case to be made for proactively exploring new settlement options over-and-above what has been promoted to the Council.¹⁹
- 5.4.81. The only other feasible locations of note are in the far north of the Borough, namely: A) a cluster of sites to the south / southwest of Hinckley (including **Site 321**); and B) a cluster of sites to the south / southeast of Hinckley adjacent or near to M69 J1 (including **Site 94**). However, there is little in the way of active promotion (of a new settlement), there are constraints to growth in this area, there is a need to consider employment land as an alternative potential land use and there is limited or no clear strategic case for a new settlement in this area, including noting that any new settlement would link to Hinckley / Leicester. With regards to 'constraints', key points to note are that: A) land between Hinckley and Nuneaton is likely sensitive in Green Belt and road traffic terms; and B) there are constraints in the vicinity of M69 J1, including an area of ancient woodland and extensive higher quality agricultural land. With regards to the lack of a strategic case, it is recognised that this could change in light of ongoing work to consider growth across the Leicester city-region, as has been discussed in Section 5.2.
- 5.4.82. Focusing on Lodge Farm (**Site 73**), there is considered to be a need to give it close consideration to the possibility of a new settlement here through appraisal of / consultation on reasonable alternative growth scenarios at this current (early) stage in the plan-making process. Whilst the Inspectors Report for the adopted Local Plan (2019) raised a wide range of issues, it is acknowledged that the site promoter has subsequently undertaken work to explore ways to address issues / better realise opportunities and, as part of this, is now proposing a considerably larger / more comprehensive scheme (~2,500 homes compared to a previous proposal for ~1,500 homes). A larger scheme could deliver a secondary school, although a new school at this location would not address the existing issue of a capacity shortfall in the north of Rugby (town) or would only help with this issue to a limited or very limited extent. Also, a larger scheme would assist with securing a high quality bus service between Rugby (SW Rugby SUE) and Daventry via Lodge Farm and Dunchurch, which is an important consideration, although major concerns would still remain regarding how to avoid problematic traffic through Dunchurch.
- 5.4.83. Finally, it is noted that there are two very large sites to the north of Lodge Farm (i.e. south of Rugby in the vicinity of Dunchurch) that have been made available, but which are not being actively promoted to anything like the same extent as Lodge Farm, namely **Site 22** and **Site 91**. The latter site has already been briefly discussed above, and is considered to perform poorly, including noting that this is the sensitive Rains Brook Valley, given nearby SW Rugby SUE and also noting higher quality agricultural land. With regards to Site 22, which is near adjacent to Lodge Farm, there is little reason to suggest that it is a preferable location to Lodge Farm at the current time (and, again, there is a need to give some weight to the fact that Lodge Farm has been a focus of promotion and work over recent years); however, it does perhaps warrant ongoing consideration as a comparator to Lodge Farm, plus its availability serves to highlight potential concerns regarding containment of growth / a risk of sprawl over time. Site 22 does have the benefit of linking to Dunchurch, the Rains Brook Valley could perhaps assist with landscape containment and nearby Draycote Water is a 'plus'; however, Lodge Farm would have the benefit of more clearly acting as a new settlement that links to both Daventry and Rugby.

¹⁹ It is reasonable to consider feasible new settlement options linked to a train station and, in this regard, attention might focus on land to the south of the anticipated Rugby Parkway Station at Houlton. However, land here is primarily within West Northamptonshire and, in any case, there are constraints in the form of two railway lines and quite extensive flood zones, plus the village of Kilby to the south is notably sensitive in historic environment terms.

Employment land scenarios

- 5.4.84. As discussed in Section 5.2, as of the base date for the Local Plan (1 April 2024) there was a residual need for the Local Plan to identify sites to deliver 202.5 ha or 739,559m² of industrial land floorspace, with a particular focus on industrial land suited to manufacturing / 'general industrial' rather than large-scale logistics. However, this residual figure is now lower following a large site gaining planning permission post 1 April 2024 for 274,388 m², namely Crouner Fields Farm, Ansty (**Site 95**).
- 5.4.85. Section 5.2 goes on to explain that a first port of call is allocation of two site options at Rugby that are to *some extent* already committed, namely SW Rugby Employment Land Phase 2 (**Site 17**) and Coton Park East (**Site 64**). Both sites are suited to delivering large-scale logistics, which serves to emphasise the need for other allocations (beyond these two sites) to be focused on suitability for 'general industrial'.
- 5.4.86. A first port of call is considered to be land in the vicinity of M6 Junction 2 and specifically **Site 14** which would deliver a northern extension to Ansty Park. The site is subject to limited constraint, is relatively well-contained in landscape / Green Belt terms and there is a need to support Ansty Park as a highly successful hub for a variety of high-value industrial and wider business activities.
- 5.4.87. Assuming that Site 14 is taken forward as a 'constant' across the RA growth scenarios, there is a residual need figure that could be met via the allocation of just one further strategic site, albeit there is also the possibility of instead meeting the residual figure via allocation of several smaller sites.
- 5.4.88. Focusing on the possibility of allocating one further strategic site, attention focuses on a choice between: A) Prologis Park West and Mountpark (west of Ryton / east of Coventry) namely **Site 328**; and B) Land north of Houlton, namely **Site 130**. These are notably different propositions, and ultimately both are taken forward for further detailed consideration through the appraisal of RA growth scenarios.
- 5.4.89. There is the potential to draw the line here, i.e. not progress any further employment land options to the RA growth scenarios for appraisal. However, on balance it is considered appropriate to progress one further broad option, namely the option of further employment land to the southwest of Rugby in the vicinity of the A45/A4071 junction, which primarily means **Site 18** and **Site 133**. There is a clear concern regarding allocation of employment land here alongside the SW Rugby SUE but, on balance, it is reasonable to progress these options (combined option) to the RA growth scenarios for further testing.
- 5.4.90. The next port of call is then an extension to Magna Park (e.g. **Site 325**). However, at this stage in the process (of defining RA growth scenarios) it is considered reasonable to rule out the possibility of allocation, i.e. this allocation option is not taken forward to the RA growth scenarios for appraisal. This reflects preferable options able to deliver on the identified need(s) in combination (as discussed above) and concerns regarding further expansion of Magna Park (as discussed in Section 5.2).
- 5.4.91. Other employment land options are then judged to perform less well such that they can be ruled out with relative ease at this stage in the process (of defining RA growth scenarios).
- 5.4.92. As discussed in Section 5.2, there is a strategic case for supporting **small / medium-sized employment sites** but at this stage it appears likely that the needs of smaller businesses could be met at the larger sites discussed above. Smaller site options of note include:
- Ryton – Sites 118 and Site 53 appear to be strongly performing small sites, although there is a need to consider potential in-combination impacts with nearby strategic employment growth.
 - SW Rugby SUE – Site 117 is of note as this parcel of land is set to be entirely enclosed by committed employment land as part of the SUE, but as discussed there is a clear case for resisting sites that would 'bolt on' to the SUE at the current time, plus access arrangements are unclear.
 - West of the SW Rugby SUE – there are then a number of sites being promoted for employment, namely Site 20, Site 25, Site 58 and Site 77, but the considerations discussed above for Site 117 also apply here, plus this land is Green Belt. Site 58 is well contained in landscape / Green Belt terms and could warrant further consideration, although achieving suitable access looks challenging.
 - M69 J1 – Site 68 is a medium-sized site, but there is an existing use on part of the site (a large restaurant in attractive grounds; also see [historic mapping](#)), flood risk is a constraint and a preferable approach might be to contain large-scale employment land to the north of the A5 in this area, where there are two distribution centres under construction (Amazon and DPD). Also, traffic along the A5 is potentially a constraint. Finally, Site 69 is a small PDL site that could warrant further consideration.

- 5.4.93. Overall, there is no clear case for a growth scenario involving allocation of one or more small / medium-sized sites for employment land at the current time, but this is a matter that can be revisited subsequent to the current consultation / prior to finalising the Local Plan for publication under Regulation 19.
- 5.4.94. The following bullet points briefly consider other employment land options that can be safely ruled out at this stage in light of the discussion above taken as a whole (but with select reasons given):
- Site 114 (NW Rugby) – is discussed above as a mixed use strategic urban extension option that is progressed to the RA growth scenarios for further consideration. It is recognised that there is also the possibility of an ‘employment only’ development, and this possibility is explored further below.
 - Site 253 (SE of Long Lawford) – is discussed above as an option for a residential-led scheme but is also available for employment. A small extension to the Paynes Lane industrial estate could warrant further consideration, but the potential for a medium-sized scheme appears to be limited by land availability (a field excluded from Site 253). Green Belt is likely a constraint, as discussed.
 - Site 94 and Site 141 (M69 J1) – discussed above as constrained; generally less strategic argument given relatively poor links to Coventry and Rugby, i.e. key centres of population).
 - Site 121 and other sites near M6 J2 – there is no need to consider further growth in this area at the current time beyond what is committed and the proposed northern extension to Ansty Park (Site 14).
 - Site 321 (south of Hinckley) – discussed as contained in Green Belt and transport terms.
 - Site 71, Site 138 and others at Ryton-on-Dunsmore – the preferable option for growth in this area is Site 328, as discussed above. Also see discussion above regarding growth at Ryton-on-Dunsmore.
 - Site 331 (north of Magna Park) – within the Green Belt and not well linked)
 - Site 31 (south of Magna Park) – not well linked / a risk of sprawl along the A5.
- 5.4.95. In **conclusion**, three employment land scenarios are taken forward:
- The emerging preferred option (PO) involving allocation of Sites 95, 64, 17, 14 and 328.
 - The PO but replace Site 328 (Prologis Park West and Mountpark) with Site 130 (North of Houlton).
 - The PO but replace Site 328 with Sites 18 and 133 (A45/A4071 junction southwest of Rugby).

Gypsy and Traveller accommodation need scenarios

- 5.4.96. The emerging proposed approach to supply involves:
- 1 pitch from the regularisation of an existing site at Wolvey (Land adj. Rosefields, Hickley Road). This is a notably rural site, not close to an existing settlement.
 - 10 pitches from the expansion of an existing site at Bryants Bungalow, Brandon Lane to the west of Ryton. This appears a reasonably unconstrained and well-linked site, but there is a need to consider future planning for nature recovery, access / recreation and flood risk management in the broad sector of land between Coventry, Binley Woods, Wolston and Ryton-on-Dunsmore.
 - 15 pitches from the regularisation of an existing site at Top Park, Top Road, Barnacle. This area benefits from relative proximity to Coventry and Bedworth, but surface water flood risk is a constraint and there appears to be a concentration of pitches in this area (a cross-border consideration).
 - 4 pitches at a new site near to Shilton, namely Wilsher Ranch/Nethergreen, Shilton Lane. The site appears to be quite unconstrained, there is good proximity to Coventry and also to a village primary school at Shilton. The site is in quite close proximity to the site at Barnacle discussed above.
 - 8 pitches as part of Coton Park East employment land allocation.
 - 8 pitches as part of the West of Prologis Park employment land allocation.
- 5.4.97. The proposal to deliver new pitches within strategic employment sites warrants ongoing scrutiny, including because there can be an element of delivery risk. No omission sites / other supply options have been identified at the current time, but this must be a focus of ongoing work, with a view to providing for identified needs as fully as possible (albeit permissive DM policy can also support windfall).

5.4.98. In **conclusion**, there is only one reasonable 'growth scenario' at the current time. However, this will need to be a matter for further consideration subsequent to the current consultation.

5.5. Reasonable growth scenarios

5.5.1. The discussion above identifies that there are reasonable alternative (RA) growth scenarios in respect of both housing and employment land growth / supply at the current time, whilst it is not possible to identify RA growth scenarios in respect of Gypsy and Traveller accommodation (at the current time).

5.5.2. Ideally housing and employment land would be considered together, i.e. it would be possible to arrive at a single set of growth scenarios for appraisal and consultation that vary in terms of both housing and employment land (i.e. essentially alternative key diagrams). However, at this stage in the plan-making process it is not possible to arrive at a single set of growth scenarios, given the number of variables ('moving parts') and options. Hence there is a need to define, appraise and consult upon two discrete sets of RA growth scenarios, namely one for housing and another for employment.

5.5.3. With regards to employment land the situation is clear, in that there are three RA growth scenarios. With regards to housing there is a need to summarise the settlement growth scenarios defined in Section 5.4 and then consider ways of combining these. See **Table 5.1**.

Table 5.1: Summary of settlement growth scenarios discussed in Section 5.4 (housing focus)

Settlement	Growth scenarios
Rugby	Three growth scenarios comprising: A) the emerging PO (allocations for 1,255 homes); and B) higher growth involving replacing Site 334 (400 homes) and Site 59 (240 homes) with Site 114 (NW Rugby for 1,800 homes in the plan period); and C) higher growth still by simply adding Site 114 (NW Rugby) to the PO.
Binley Woods	One growth scenario (i.e. the emerging PO)
Brinklow	Two growth scenarios comprising: A) the emerging PO (two allocations for 415 homes); and B) lower growth involving just one of the allocations (75 homes).
Clifton-upon-Dunsmore	One growth scenario (i.e. the emerging PO) on balance
Dunchurch	One growth scenario (i.e. the emerging PO) on balance
Long Lawford	Two growth scenarios comprising: A) the emerging PO (one allocation for 400 homes); and B) lower growth involving no allocation.
Ryton-on-Dunsmore	One growth scenario (i.e. the emerging PO) on balance
Stretton-on-Dunsmore	One growth scenario (i.e. the emerging PO) on balance
Wolston	One growth scenario (i.e. the emerging PO)
Wolvey	Two growth scenarios comprising: A) the emerging PO (three allocations for 710 homes); and B) lower growth involving two allocations for 210 homes.
Smaller villages	One growth scenario (i.e. the emerging PO)
New settlement	Two growth scenarios comprising: A) the emerging PO (no new settlement); and B) allocation of Lodge Farm for 1,800 homes in the plan period

5.5.4. Combining these settlement growth scenarios to form a single set of borough-wide reasonable growth scenarios is clearly challenging. A starting point is the emerging preferred growth scenario (or simply 'preferred option', **PO**) which involves allocations to deliver 3,338 homes which, in combination with existing commitments and windfall, would result in total supply of 14,134 homes over the plan period, such that the housing requirement would be set at LHN (12,978 homes) with a 9% supply buffer.²⁰

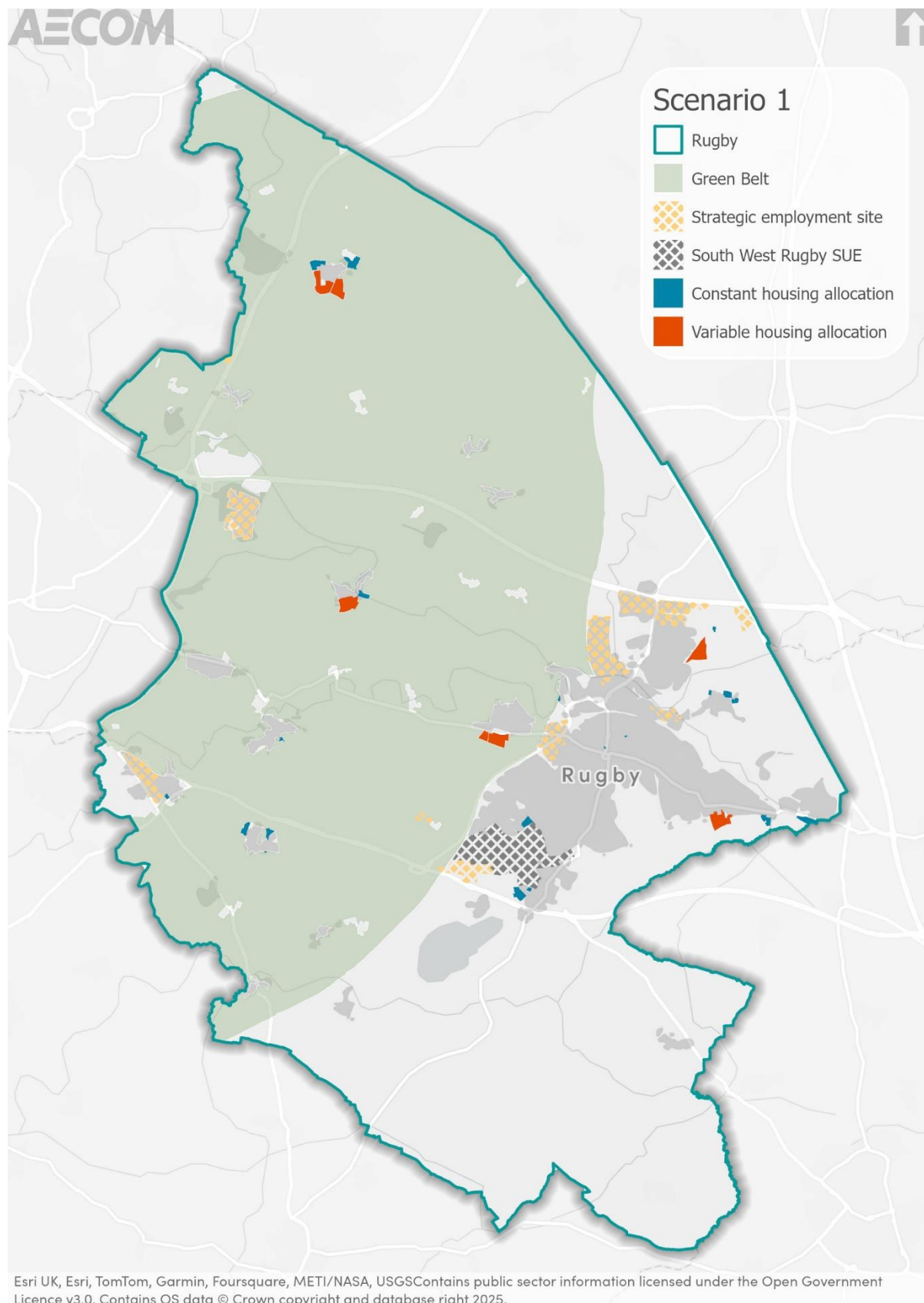
²⁰ Existing commitments comprise: South West Rugby – 3,990 homes; Houlton remainder deliverable by 2045 – 3,780 homes; Eden Park, Rugby – 664 homes; Other allocations under Local Plan 2011-2031 – 633 homes; and other sites with planning permission (less 10% non-implementation rate on sites that are not under construction) – 679 homes. The windfall assumption (small sites fewer than 5 homes at 50 homes per year) is 1,050 homes over the plan period.

- 5.5.5. The starting point for considering further growth scenarios is then the possibility of additionally allocating either NW Rugby or Lodge Farm. This would deliver significantly higher growth with a view to the local plan setting a higher housing requirement (likely driven by a desire to provide more fully for affordable housing needs, but also potentially mindful of the risk of unmet need from elsewhere in the sub-region) and/or an enabling a larger supply buffer (such that the Local Plan supply is more 'robust', i.e. so that the Borough is at lower risk of being subject to the presumption in favour of sustainable development).
- 5.5.6. The final scenarios to consider then involve allocation of either NW Rugby or Lodge Farm and commensurately removing emerging preferred sites at Rugby, Brinklow, Long Lawford and Wolvey.
- 5.5.7. In **conclusion**, in addition to the three employment land growth scenarios (as set out above at paragraph 5.4.95) there are five housing growth scenarios:
- Growth scenario 1 – the preferred option (PO) = 14,134 homes supply
 - Growth scenario 2 – the PO minus select sites plus NW Rugby = 14,054 homes supply
 - Growth scenario 3 – the PO minus select sites plus Lodge Farm = 14,054 homes supply
 - Growth scenario 4 – the PO plus NW Rugby = 15,934 homes supply
 - Growth scenario 5 – the PO plus Lodge Farm = 15,934 homes supply

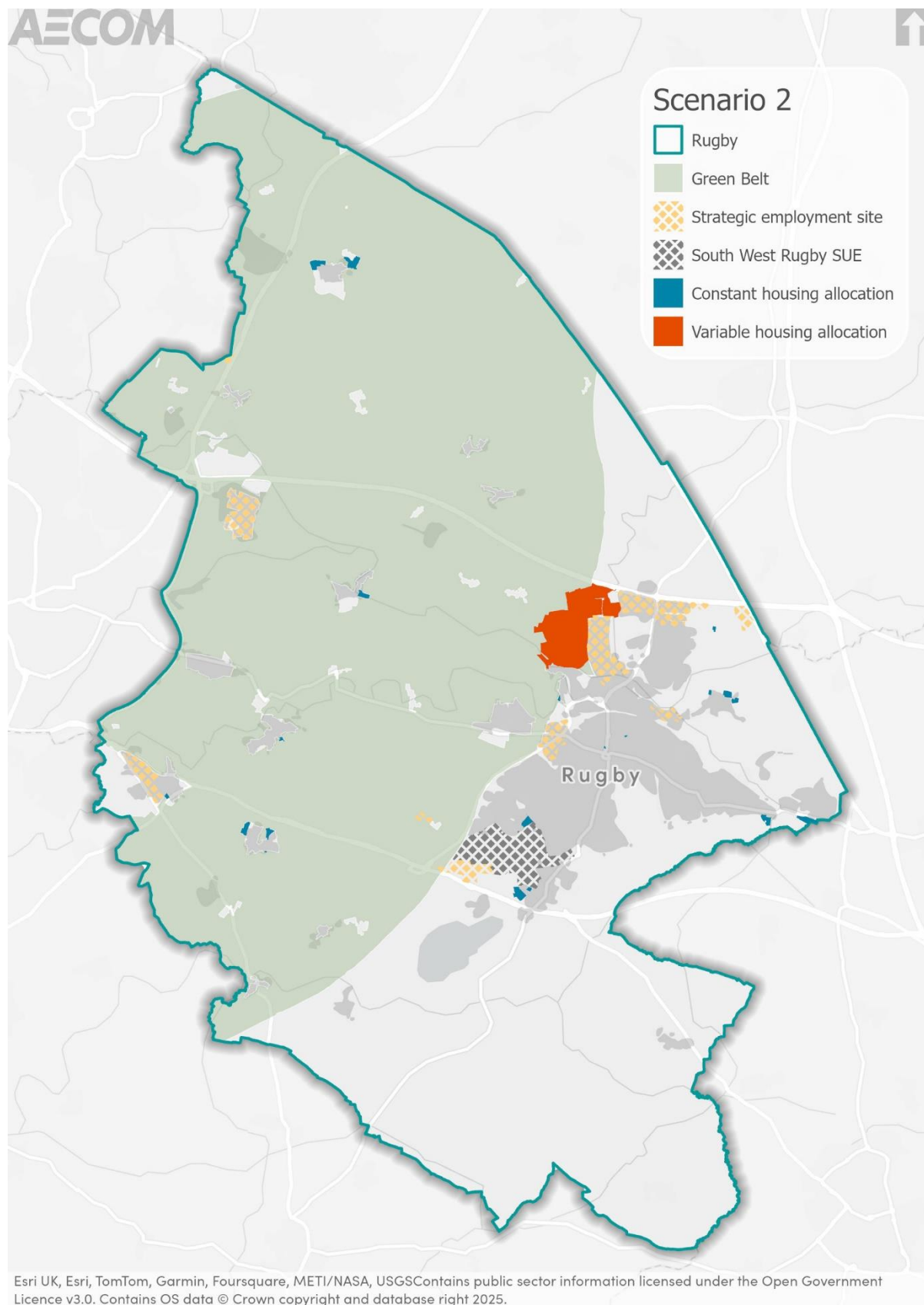
Table 5.2: Reasonable alternative growth scenarios for housing (constants greyed-out)

Supply component		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
Commitments and windfall		10,796	10,796	10,796	10,796	10,796
Rugby	Constants (x7)	615	615	615	615	615
	Site 59	240	-	-	240	240
	Site 334	400	-	-	400	400
	Site 114	-	1,800	-	1,800	-
Binley Woods		-	-	-	-	-
Brinklow	Constant (Site 337)	75	75	75	75	75
	Site 315	340	-	-	340	340
Clifton-upon-Dunsmore (Sites 129, 202 & 307)		150	150	150	150	150
Dunchurch (Sites 90 & 341)		210	210	210	210	210
Long Lawford (Site 316)		400	-	-	400	400
Ryton-on-Dunsmore (Site 100)		100	100	100	100	100
Stretton-on-Dunsmore (Sites 6, 26 & 134)		168	168	168	168	168
Wolston (Site 39)		15	15	15	15	15
Wolvey	Constants (Sites 84 and 309)	210	210	210	210	210
	Site 96	500	-	-	500	500
Smaller villages		-	-	-	-	-
New settlement (Lodge Farm)		-	-	1,800	-	1,800
Total homes over 21 years (2024-45)		14,134	14,054	14,054	15,934	15,934

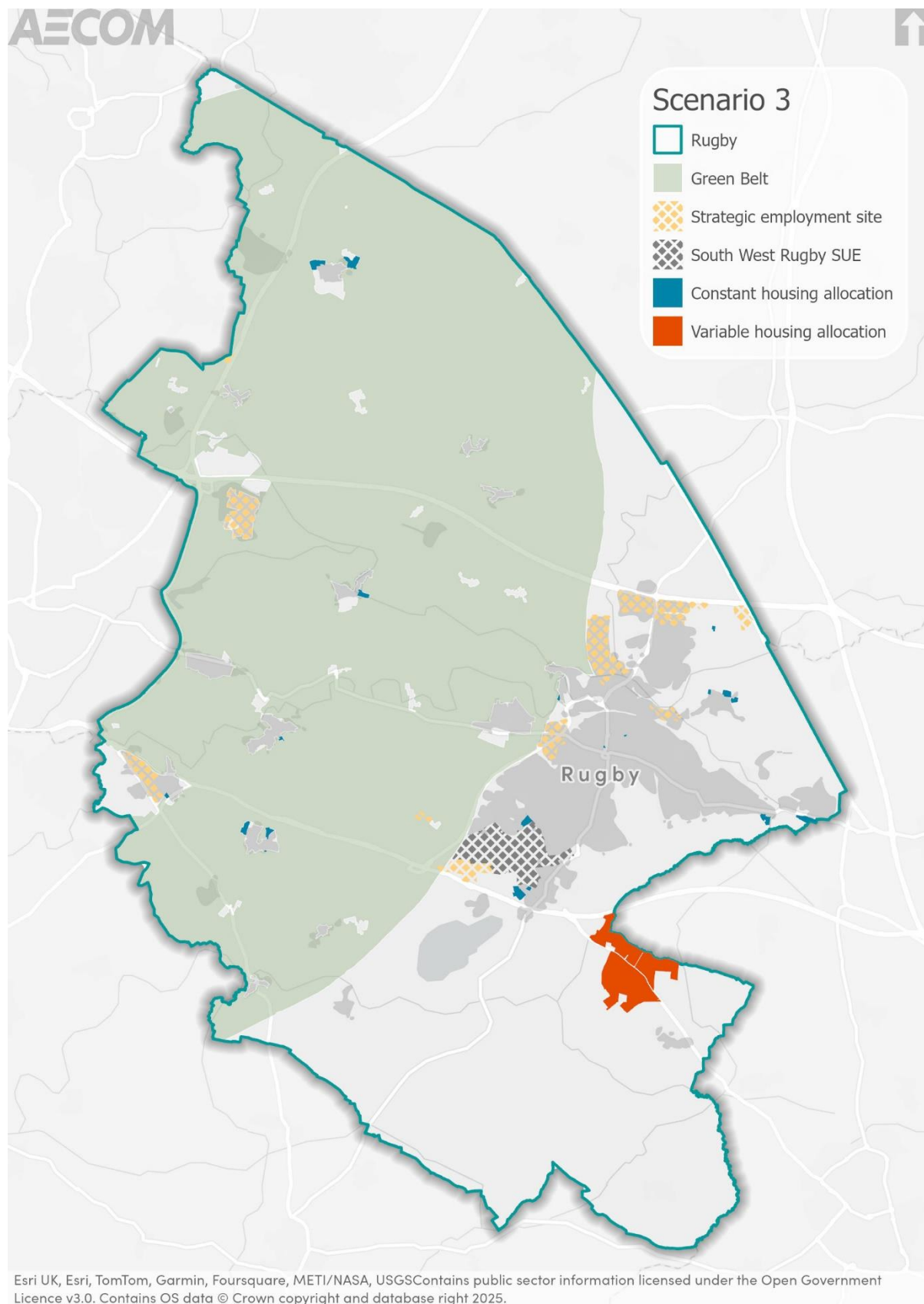
Housing growth scenario 1 – the preferred option (PO)



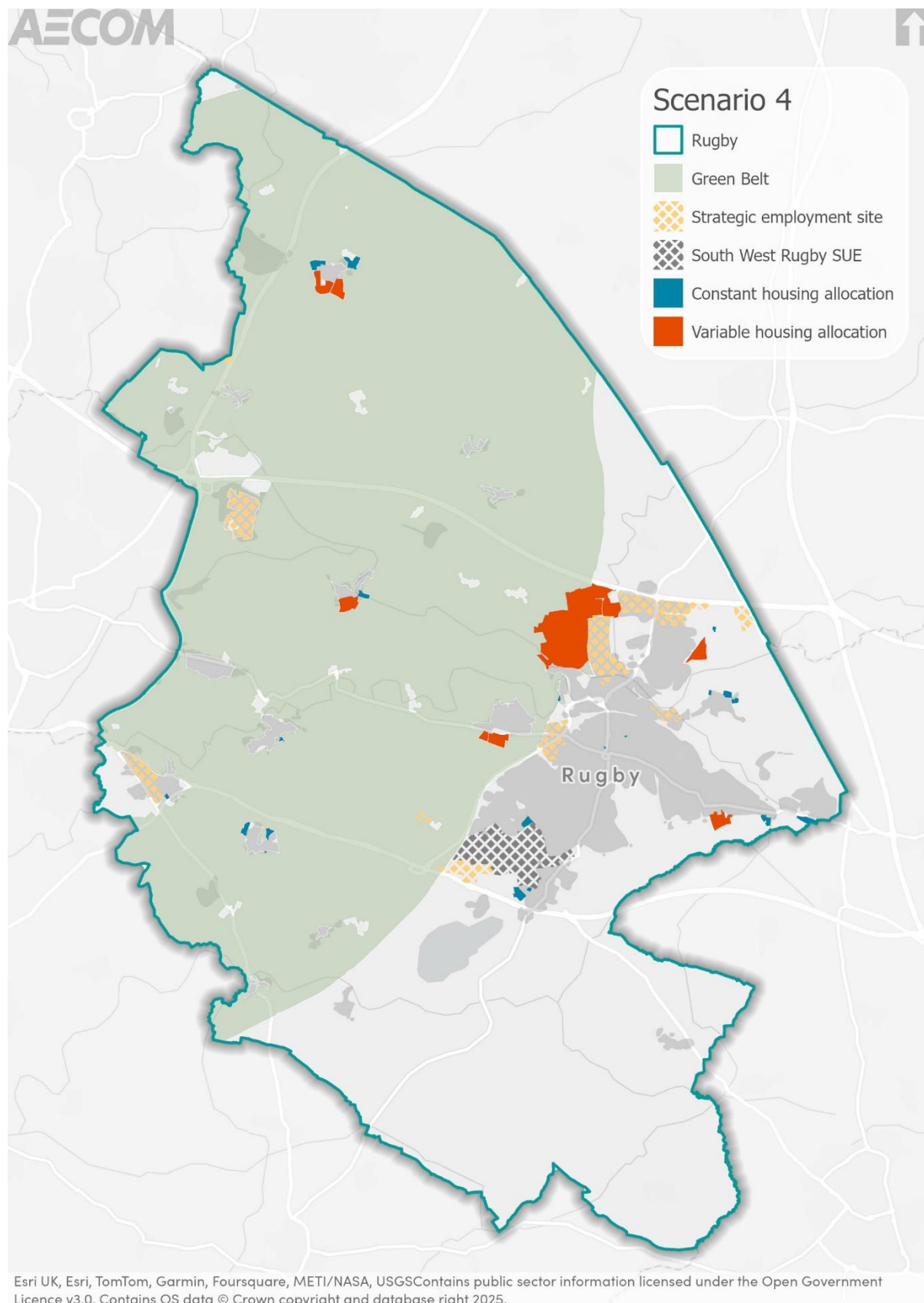
Housing growth scenario 2 – the PO minus select sites plus NW Rugby



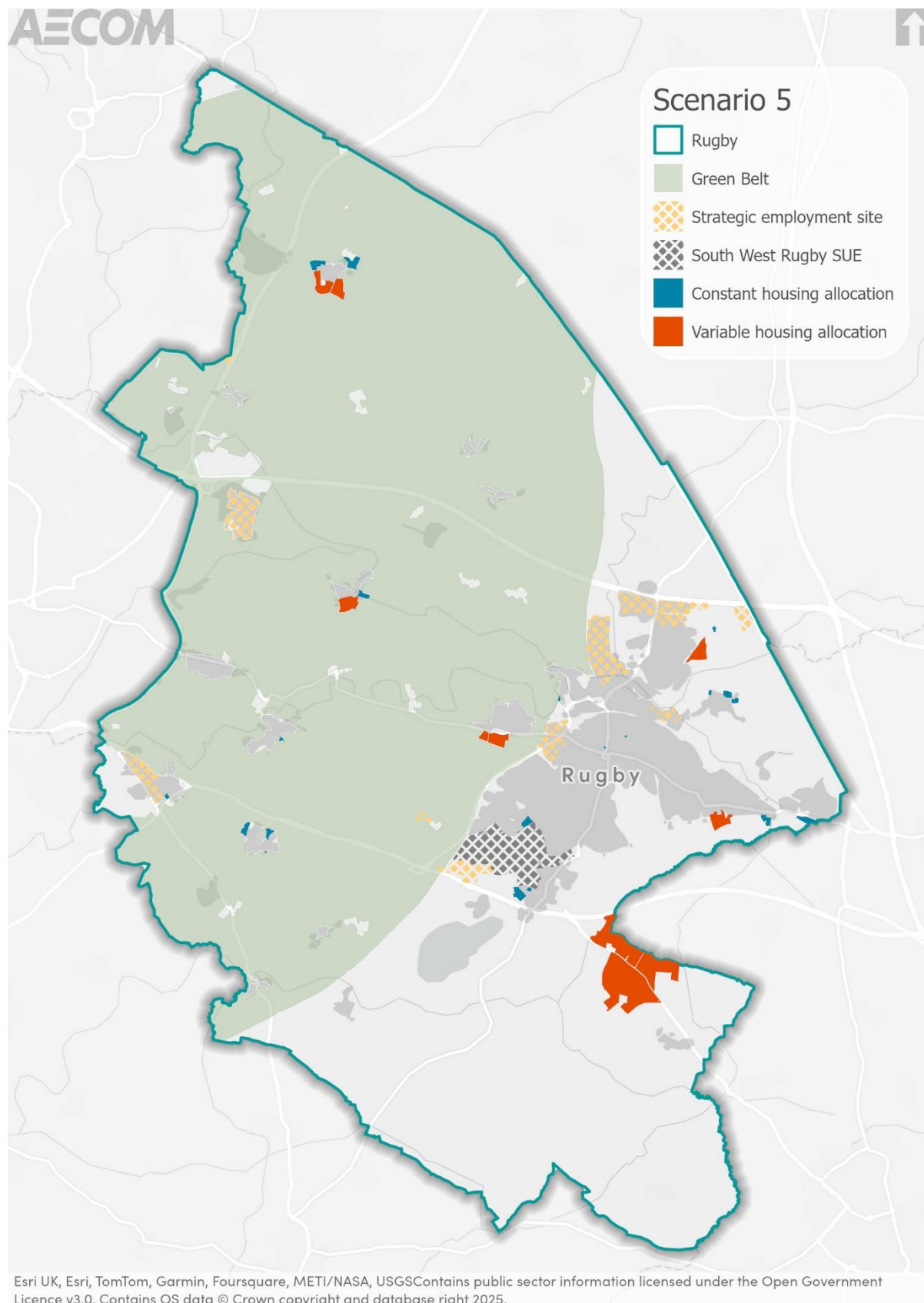
Housing growth scenario 3 – the PO minus select sites plus Lodge Farm



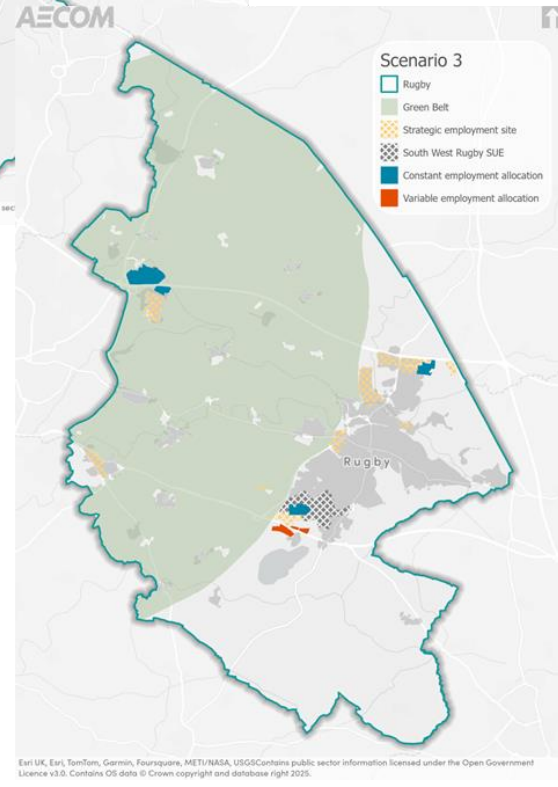
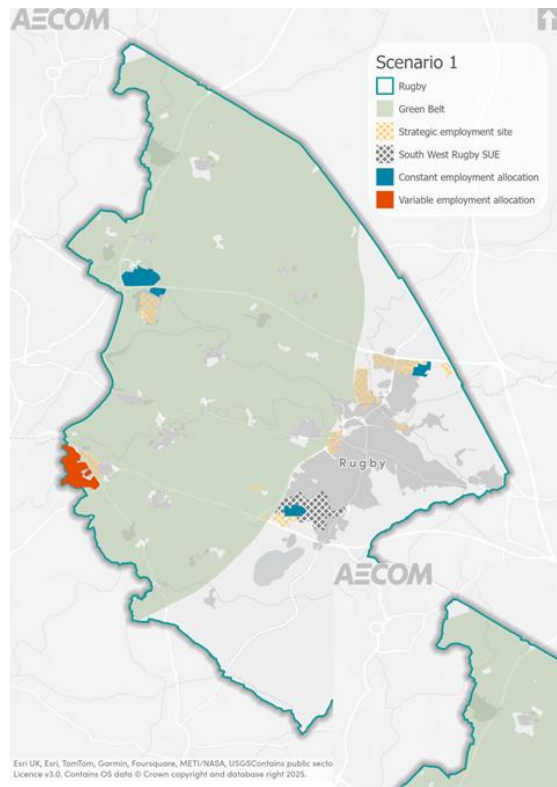
Housing growth scenario 4 – the PO plus NW Rugby



Housing growth scenario 5 – the PO plus Lodge Farm



Employment land growth scenarios



6. Growth scenarios appraisal

6.1. Introduction

6.1.1. The aim here is to appraise the two sets of reasonable growth scenarios introduced above under the SA framework (Section 3). Specifically:

- Section 6.2 – presents an appraisal of the housing growth scenarios.
- Section 6.3 – presents an appraisal of the employment land growth scenarios.

Appraisal methodology

6.1.2. Under each sustainability topic heading the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of ‘significant effects’ using red / amber / light green / green, where:

- **Red** indicates a significant negative effect
- **Amber** indicates a negative effect of limited or uncertain significance
- **Light green** indicates a positive effect of limited or uncertain significance
- **Green** indicates a significant positive effect
- **No colour** indicates a neutral effect

6.1.3. Further methodological points are as follows:

- Constant site allocations – are not a focus of the appraisal below (i.e. the focus is on those site allocation options that are a variable) but feed into conclusions on significant effects. Constant site allocations are then a focus of the appraisal of the Draft Local Plan as a whole, within Part 2 of this report.
- Assumptions – there is a need to make significant assumptions, e.g. around scheme masterplanning, infrastructure delivery, etc. As part of this, account is taken of materials submitted by site promoters, but it is recognised that any scheme-specific proposals are subject to change. The appraisal aims to strike a balance between a need to explain assumptions and ensure a concise appraisal.

6.2. Housing growth scenarios appraisal

Introduction

6.2.1. The aim here is to appraise the five reasonable growth scenarios introduced in Section 5.5, namely:

- Growth scenario 1 – the preferred option (PO) = 14,134 homes supply
- Growth scenario 2 – the PO minus select sites plus NW Rugby = 14,054 homes supply
- Growth scenario 3 – the PO minus select sites plus Lodge Farm = 14,054 homes supply
- Growth scenario 4 – the PO plus NW Rugby = 15,934 homes supply
- Growth scenario 5 – the PO plus Lodge Farm = 15,934 homes supply

6.2.2. The appraisal is presented below under the SA framework, before a final section presents conclusions.

Accessibility

Scenario 1 Preferred option (PO)	Scenario 2 PO minus select sites plus NW Rugby	Scenario 3 PO minus select sites plus Lodge Farm	Scenario 4 PO plus NW Rugby	Scenario 5 PO plus Lodge Farm
★ 1	3	5	2	4

6.2.3. Schools capacity / ensuring good access from growth locations to schools (primary and secondary) is a key issue for the local plan, as discussed in Section 5.

6.2.4. Scenario 1 performs very well, as it has been developed with the specific aim of responding to schools capacity issues and opportunities. However, there are some delivery risks / uncertainties, including in respect of the proposed new secondary school to the northeast of Rugby.

6.2.5. Under Scenarios 2 and 3 the first thing to say is that there would be opportunities missed to deliver new primary school capacity to serve Brinklow and Wolvey, although it is not clear the extent to which there would be resulting issues at these villages in terms of children needing to travel to attend school.

6.2.6. At Brinklow the opportunity relates to delivering new primary school capacity at Monks Kirby, which is 5km distant, such that there is perhaps a need to give limited weight to the opportunity and, in turn, a case to be made for the lower growth scenario at Brinklow.

6.2.7. With regards to NW Rugby, whilst the site has clear potential to deliver a secondary school, there are clear access constraints affecting the site such that it is not an ideal school location. It is also the case that supporting a school at this site, rather than at a site to the northeast of Rugby (Scenarios 1, 4 and 5), could lead to delayed delivery and potentially some additional delivery risk.

6.2.8. With regards to Lodge Farm, a clear issue is that a secondary school here would do little if anything to address the current capacity shortfall affecting the north of Rugby.

N.B. the assumption is that under scenarios involving Lodge Farm there would not additionally be a secondary school delivered to the northeast of Rugby, given limited funding available to deliver schools.

6.2.9. Other than matter of schools capacity issues / opportunities, it is recognised that there is generally a case for directing growth to Rugby rather than to villages, which lends some support for Scenario 2; however: NW Rugby is associated with accessibility challenges; under Scenario 2 the assumption is that two reasonably well located urban extensions to Rugby would not be delivered (although Site 59 to the northeast has somewhat challenging accessibility given a former railway line LWS); and, of the villages that see lower growth under Scenario 2, Brinklow and Long Lawford have reasonably good settlement scores, whilst at Wolvey there is a significant opportunity to deliver new community infrastructure.

6.2.10. In **conclusion**, a significant positive effects is predicted for Scenario 1 and a 'moderate or uncertain' positive effect for Scenario 4. Scenario 3 performs poorly because it would certainly not deliver a new secondary school in the north of Rugby and a 'moderate or uncertain' negative effect is predicted for Scenario 5 as it might prove difficult to fund and so deliver a secondary in the north of Rugby.



Air quality

Scenario 1 Preferred option (PO)	Scenario 2 PO minus select sites plus NW Rugby	Scenario 3 PO minus select sites plus Lodge Farm	Scenario 4 PO plus NW Rugby	Scenario 5 PO plus Lodge Farm
★ 1	2	3	4	5

6.2.11. A designated Air Quality Management Area (AQMA) covers Rugby, Long Lawford, Clifton Upon Dunsmore and Dunchurch, which is quite unusual, and serves as an indication of the problematic traffic congestion that is experienced locally, and which spatial strategy must respond to. There is a need to ensure a strong focus on minimising the need to travel, supporting modal shift away from the private car and avoiding problematic traffic congestion.

- 6.2.12. Given the AQMA issue it is appropriate to flag a concern with the two higher growth scenarios. In particular, there is a concern with Scenario 5, given limited potential to walk/cycle from Lodge Farm to key destinations and because of a concern regarding traffic through Dunchurch (discussed below), albeit there would be good potential to achieve a high quality bus service.
- 6.2.13. With regards to Scenario 1 versus Scenario 2, on balance these two scenarios are judged to perform broadly on a par, given that: A) NW Rugby is associated with clear accessibility challenges, which could also translate into challenges in respect of achieving good bus connectivity; B) under Scenario 2 the assumption is that there would not be two modest urban extensions to Rugby (Sites 59 and 334) that are both reasonably well-located in terms of active and public transport (also see discussion above re Site 59); and C) whilst there is a case for lower growth at villages under Scenario 2, growth at villages has the benefit of leading to dispersed car trips (to a degree) and one of the villages in question (Long Lawford) benefits from reasonable or good accessibility in terms of active and public transport.
- 6.2.14. In **conclusion**, whilst it is appropriate to flag a concern with the higher growth scenarios given the AQMA issue, on balance only a 'moderate or uncertain' negative effect is predicted, recognising that air quality is generally improving over time and also noting that poor air quality is also an issue affecting both Coventry (where there is an area-wide AQMA) and Leicester (where there is a city centre AQMA).

Biodiversity

Scenario 1 Preferred option (PO)	Scenario 2 PO minus select sites plus NW Rugby	Scenario 3 PO minus select sites plus Lodge Farm	Scenario 4 PO plus NW Rugby	Scenario 5 PO plus Lodge Farm
2	2	2		




- 6.2.15. Both NW Rugby and Lodge Farm are subject to notably low biodiversity constraint. As such, attention focuses on the emerging preferred allocations that do not feature under Scenarios 2 and 3, namely:
- Site 59 northwest of Rugby (240 homes) – is subject to notable biodiversity constraint given an adjacent former railway line that is designated as a Local Wildlife Site (LWS) and accessible as a Local Nature Reserve, plus there is a fairly high density of mature / historic field boundaries.
 - Site 334 south of Rugby (400 homes) – limited biodiversity constraint.
 - Site 315 south of Brinklow (340 homes) – there is a stream corridor at the southern edge of the site that is a LWS, but it is not associated with any priority habitat. There would be good potential to avoid impacts (and feasibly deliver some enhancement) through masterplanning, although there is perhaps a risk of future pressure to expand beyond the stream corridor / LWS.
 - Site 316 south of Long Lawford (400 homes) – there is a stream corridor at the western edge of the site that is a LWS, but it is not associated with any priority habitat. There would be good potential to avoid impacts (and feasibly deliver some enhancement) through masterplanning. The flood risk zone is relatively wide, such that it is more difficult to envisage future pressure for growth beyond.
 - Site 96 south of Wolvey (500 homes) – limited biodiversity constraint. Wolvey is associated with the confluence of the River Avon and a significant stream corridor, and at the point of the confluence there is a series of lakes (presumably associated with late 20th century minerals extraction) such that a high growth scenario for the village might deliver a coordinated enhancement strategy.
- 6.2.16. In **conclusion**, none of the variable sites are associated with significant biodiversity constraint, such that it is appropriate to conclude that there is merit in a higher growth strategy, recognising that the effect of higher growth could feasibly be to relieve growth pressure elsewhere in the sub-region. For example, the broad landscape associated with the River Avon valley to the south and southeast of Coventry is subject to relatively high constraint, and there is ancient woodland constraint east of Hinckley.
- 6.2.17. With regards to significant effects, there is a need to take account of site allocations that are held constant across the growth scenarios, certain of which are subject to a degree of constraint. However, overall concerns are limited, such that a neutral effect is predicted for all of the growth scenarios.

Climate change mitigation

Scenario 1 Preferred option (PO)	Scenario 2 PO minus select sites plus NW Rugby	Scenario 3 PO minus select sites plus Lodge Farm	Scenario 4 PO plus NW Rugby	Scenario 5 PO plus Lodge Farm
★ 1	3	2	2	★ 1



- 6.2.18. The focus of discussion here is on minimising per capita greenhouse gas emissions from the built environment, recognising that transport emissions (arguably a more significant consideration) can be a focus of discussion below under the 'Transport' topic heading.
- 6.2.19. It is inherently difficult to differentiate between site options and growth scenarios (i.e. combinations of site options) in terms of potential to minimise built environment emissions, which primarily means achieving standards of 'operational' built environment emissions over-and-above those required under the Building Regulations, although a further consideration is non-operational / embodied emissions, e.g. emissions associated with concrete, steel, other construction materials and the construction process.
- 6.2.20. As a general rule it can often be said that strategic site options give rise to an opportunity to achieve high standards – and potentially even to achievement of net zero development – over-and-above smaller sites, given: A) the potential to realise certain opportunities through masterplanning; B) economies of scale that can be supportive of development viability (such that there is potentially viability 'headroom' to allow funding to be directed to decarbonisation measures); and C) generally because strategic schemes are naturally a focus of scrutiny and might even be delivered as a flagship/exemplar. However, in practice, the recent experience in the Borough has been that strategic sites have faced development viability challenges that have greatly constrained their ability to deliver affordable housing and so presumably (it has not been possible to review matters in detail) have also constrained their ability to deliver standards of built environment decarbonisation that go beyond minimum requirements.
- 6.2.21. In turn, a key consideration is potentially around directing growth to locations with strong development viability on the basis of there being a strong housing market and/or because the sites involved are not associated with abnormal development costs / are likely to be relatively easy to deliver.
- 6.2.22. In this regard there is quite strong support for the five variable allocations that feature under Scenarios 1, 4 and 5 but not under Scenarios 2 and 3, and perhaps most notably the three village sites. All five sites appear to be relatively unconstrained and as medium-sized sites, will benefit from economies of scale without necessarily triggering a need for major transport upgrades. Having said this though: Site 59 at Rugby is notable as the smallest of the five sites plus there may be a need for some notable transport upgrades to deliver the site alongside a secondary school; and Site 334 at Rugby is in proximity to both Houlton and SW Rugby, which could have a dampening effect on the housing market.
- 6.2.23. With regards to NW Rugby versus Lodge Farm, there is greater certainty regarding the potential to viably deliver a high quality scheme at Lodge Farm. At NW Rugby it appears likely that there would be a need to deliver some very significant transport upgrades, and this might be a less attractive location for home buyers than is the case for Lodge Farm (with implications for viability headroom).
- 6.2.24. In **conclusion**, there is support for Scenarios 1 and 5 on the basis that development viability is a key factor. With regards to significant effects, there is a need to factor-in: A) sites that are a constant across the growth scenarios; and B) any local targets in respect of achieving 'net zero'. With regards to (A), most of the constant sites are relatively small, but there has generally been a focus on allocating sites with strong development viability and delivery credentials, e.g. there are few proposed allocations with existing uses on site that could impact viability / delivery. With regards to (B), whilst the Council as an organisation has committed to achieving net zero by 2030, there is no commitment to achieve net zero borough-wide ahead of 2050, which is the national net zero target date (in contrast to a number of neighbouring authorities, e.g. Hinckley and Bosworth Borough has committed to achieving net zero area-wide by 2030). On balance it is considered appropriate to flag a 'moderate or uncertain' negative effect only for the three worst performing scenarios, although it is acknowledged that there is a case to be made for reaching this conclusion for all five scenarios, on the basis that climate change mitigation / decarbonisation is a national priority to the extent that it must feed in strongly to all key decision-making as part of preparing a Local Plan, which primarily means decision around spatial strategy / site selection.

Climate change adaptation

Scenario 1 Preferred option (PO)	Scenario 2 PO minus select sites plus NW Rugby	Scenario 3 PO minus select sites plus Lodge Farm	Scenario 4 PO plus NW Rugby	Scenario 5 PO plus Lodge Farm
		2		2

- 6.2.25. A key consideration here is flood risk, recognising that whilst this is an issue currently it is an issue that is set to get worse as a result of climate change, with expanded flood zones and more frequent flooding.
- 6.2.26. None of the variable smaller (medium-sized) sites are significantly constrained, i.e. intersect a flood risk zone to the extent that this will be a major constraint to masterplanning, such that there could be a need to accept compromises (feasibly even in respect of flood risk) or delivery could become challenging.
- 6.2.27. However, modest surface water flood risk channels intersect the variable growth locations at Wolvey and Brinklow, and there is a significant surface water flood channel along the A428 at the northern extent of the site in question at Long Lawford. At Rugby there would also be a need to masterplan with a surface water flood channel in mind at Site 59, whilst Site 334 to the south is unconstrained by flood risk.
- 6.2.28. A final consideration is downstream properties at risk from flooding at Long Lawford, but it is difficult to suggest any concerns given the potential to avoid any worsening of offsite / downstream flood risk as a result of development through delivery of high quality Sustainable Drainage Systems (SuDS; N.B. potential to deliver SuDS is affected by geology / soil type).
- 6.2.29. Finally, with regards to the two variable strategic growth options:
- NW Rugby – much of the site is unconstrained in flood risk terms but there is a need to bridge the floodplain of the River Swift in order to access the site. There is also need to consider that the Rugby urban area downhill / downstream is constrained by extensive flood risk zones associated with the River Avon. In turn, there could feasibly be the potential to explore opportunities around strategic flood water attenuation.
 - Lodge Farm – only intersects a fluvial flood risk zone at its northwestern extent but intersects a series of significant surface water flood risk zones. As a large strategic site there would be excellent potential to masterplan with flood risk in mind, clearly to include avoiding any sensitive development in a flood zone, and it could also be that flood risk zones provide structural framework around which to masterplan with a view to delivering a legible and high quality new community. However, at this early stage it is considered appropriate to flag flood risk as a potential constraint.
- 6.2.30. In **conclusion**, it is appropriate to flag a slight concern with Lodge Farm at this stage, but at the next stage of the plan-making process it will likely be possible to conclude no significant concerns (pending comments from the Environment Agency, and should the site still be in contention for allocation).
- 6.2.31. With regards to significant effects, there is a need to also factor-in sites that are a constant across the growth scenarios, but overall there are limited concerns (as discussed below) such that neutral effects are predicted across all of the growth scenarios.

Communities, health and well-being

Scenario 1 Preferred option (PO)	Scenario 2 PO minus select sites plus NW Rugby	Scenario 3 PO minus select sites plus Lodge Farm	Scenario 4 PO plus NW Rugby	Scenario 5 PO plus Lodge Farm
2			2	2

- 6.2.32. This is a broad topic heading under which there is the potential to consider wide-ranging issues / opportunities over-and-above those discussed under the 'accessibility' and 'homes' topic headings.

6.2.33. A headline consideration is anticipated local community concerns regarding relatively high growth strategies at Brinklow, Long Lawford and Wolvey under Scenarios 1, 4 and 5. Considerations include:

- Brinklow – is a historic village (with an extensive conservation area) and growth is not at present proposed to deliver benefits to the village beyond housing, green space and funding expansion of the primary school at Monks Kirby (although through the consultation opportunities for other improvements that development could deliver will be explored).
- Wolvey – is also a historic village, and notably rural, but there is clear potential for growth to deliver well-targeted benefits to the local community, as has been discussed.
- Long Lawford – there is the context of significant recent growth and, indeed, the allocation under consideration would largely extend a site currently under construction. However, it is the case that the new allocation option would link effectively with the site currently under construction (although there would be a need to cross the A428 to reach the village centre, which is not ideal).

6.2.34. With regards to the two variable medium-sized site options at Rugby:

- Site 59 to the northeast – would significantly impact the landscape gap between Rugby and Newton. However, Newton would/could benefit from a new secondary school, and would benefit from transport upgrades, plus a new secondary school here could help to secure Newton's position as a village distinct from Rugby in the long term. Finally, the new community would benefit from an adjacent nature reserve, although the corollary is that linking well into Rugby is challenging.
- Site 334 to the south – benefits from good accessibility to local schools and other community infrastructure. However, land availability leads to a challenge in terms of achieving high quality active travel connections, and it is understood that there are some local community concerns, including reflecting a general view regarding the sensitive nature of the urban edge in this area given the descending topography to the Rains Brook Valley (discussed further below).

6.2.35. Finally, with regards to the two variable strategic growth options:

- NW Rugby – as has been discussed access is clearly challenging and there is generally a concern regarding the potential for a new community to link effectively to Rugby given the intervening industrial area, the River Swift corridor and the Oxford Canal corridor. Further constraints include a Health and Safety Executive (HSE) consultation zone (affecting a small part of the site) and overhead power lines. However, there may well be technical solutions (likely with cost / viability implications) and there are likely relatively few concerns regarding impacts to nearby communities. Indeed, adjacent Newbold on Avon area experiences notable relative deprivation, such that there could be the potential to deliver well-targeted measures aimed at benefiting the area.
- Lodge Farm – has been discussed for a number of years and has generated significant opposition among rural residents and those of Dunchurch. There would be a significant landscape gap to the rural village of Willoughby to the south, and this would be retained in perpetuity given flood risk zones. The main concern is likely around impacts to Dunchurch, particularly in terms of traffic, as discussed further below. Otherwise, and has been discussed, there could be the potential to deliver a high quality new settlement, albeit the site straddles the A45 leading to severance, and there would be a range of major infrastructure and wider costs with implications for development viability and, in turn, likely a need to accept compromises including around masterplanning / place-making.

6.2.36. In **conclusion**, under this topic heading it is considered appropriate to flag a potential case for reduced growth at villages. With regards to significant effects, and factoring-in allocations that are a constant across the growth scenarios, it is considered appropriate to conclude 'moderate or uncertain' positive effects across all the scenarios. It is clearly the case that the emerging preferred strategy / set of allocations has been developed with local community interests as a foremost consideration, and both NW Rugby and Lodge Farm overall likely represent an opportunity in terms of directing growth with a view to aligning with community, health and wellbeing objectives.

Economy and employment

Scenario 1 Preferred option (PO)	Scenario 2 PO minus select sites plus NW Rugby	Scenario 3 PO minus select sites plus Lodge Farm	Scenario 4 PO plus NW Rugby	Scenario 5 PO plus Lodge Farm
=	=	=	=	=

- 6.2.37. There is limited potential to comment here, recognising that employment land growth scenarios are given stand-alone consideration below, i.e. given that the current housing growth scenarios are appraised with minimal assumptions made regarding employment land strategy.
- 6.2.38. The main consideration is around directing housing growth to locations well-connected to centres of employment and employment growth areas; however, it is difficult to reach strong conclusions, beyond:
- Brinklow and Wolvey are more rural locations but are nonetheless in reasonable or good proximity to key centres of employment.
 - NW Rugby is better located in terms of accessing employment than Lodge Farm, although Lodge Farm would have the benefit of being well-linked to a major centre of employment at SW Rugby, could be considered better linked by road to Coventry and would be well-linked to Daventry.
- 6.2.39. In **conclusion**, it is not possible to differentiate between the growth scenarios with confidence and neutral effects are predicted.

Historic environment

Scenario 1 Preferred option (PO)	Scenario 2 PO minus select sites plus NW Rugby	Scenario 3 PO minus select sites plus Lodge Farm	Scenario 4 PO plus NW Rugby	Scenario 5 PO plus Lodge Farm
=	=	=	=	=


- 6.2.40. This is a key factor with a bearing on spatial strategy / site selection in the Rugby context:
- Brinklow (higher growth under Scenarios 1,3 and 4) – the village is sensitive and the variable growth location under consideration would have some impact on the setting of the conservation area, albeit potentially limited to its eastern edge (noting a constant proposed allocation here). The site also contains ridge and furrow (again, seemingly the eastern part of the site).
 - Long Lawford (higher growth under Scenarios 1,3 and 4) – the proposed growth location was historically a rural area and has commensurately low historic environment sensitivity. However, there is a historic farm at the northern extent of the site, including a Grade II listed farmhouse. The farm is well-screened from the A428 but is prominent within a rural landscape on the approach to Long Lawford from the south along Lawton Heath Lane, which is potentially a popular walking/cycling route from Rugby (noting bridleways and the Avon Valley to the north).
 - Wolvey (higher growth under Scenarios 1,3 and 4) – the variable growth location is notably separated from the historic core of the village and appears to be subject to limited or low historic environment constant overall. As a river valley area it could potentially be the case that there is a degree of archaeological sensitivity, but it has not been possible to explore this in detail.
 - NE Rugby (higher growth under Scenarios 1,3 and 4) – this was a historically rural landscape, some way distant from Rugby and there are no listed assets in the vicinity. However, Newton Manor House is located adjacent to the south and is shown on [historic mapping](#) and also shown is “the site of St Thomas Cross” at the historic crossroads to the east of the site ([information here](#)), where there is currently an attractive historic public house (The St Thomas Cross). Finally, there is significant ridge and furrow across the eastern part of the site that, it is assumed, would deliver a secondary school (at least under Scenario 1).

- South Rugby (higher growth under Scenarios 1,3 and 4) – this area was historically the village of Hillmorton, which was subsumed into Rugby in the 20th century. The site is separated from the former high street to the north, which has a strong historic character (but is not designated as a conservation area), but it is noted that historic mapping shows a characteristic field pattern.
- NW Rugby SUE (Scenarios 2 and 4) – the site includes the shrunken village of Cosford, which is a scheduled monument and a significant constraint, noting public rights of way and also given a likely need to achieve access to the site via a route in close proximity. Also, to the south of the site is the Oxford Canal and beyond that the historic core of Newbold on Avon, although the Grade I listed church is well set back.
- Lodge Farm (Scenarios 3 and 5) – this is a historically very rural area with low onsite sensitivity; however, there is a significant concern regarding traffic impacts through the Dunchurch Conservation Area, which is a key asset within the Borough (noting the dense concentration of listed buildings) already under pressure as a result of nearby growth. There is also significant historic environment constraint to the east of Dunchurch which likely rules out the possibility of an eastern bypass.

6.2.41. In **conclusion**, it is not possible to differentiate between the growth scenarios with any certainty at this stage (the views of Historic England received through the current consultation will feed-in to plan-making at the next stage). With regards to the variable medium-sized sites it is Site 315 south of Brinklow that is likely most constrained given onsite ridge and furrow and proximity to the conservation area, and ridge and furrow affecting Site 59 at Rugby is also a constraint; but potentially equally significant is the onsite constraint affecting NW Rugby and the concern around Lodge Farm impacting Dunchurch.

6.2.42. With regards to significant effects, a key consideration is that whilst Historic Impact Assessments have been prepared these will need to be scrutinised through the current consultation. At this stage, it is appropriate to predict 'moderate or uncertain' negative effects for all of the growth scenarios.

Homes

Scenario 1 Preferred option (PO)	Scenario 2 PO minus select sites plus NW Rugby	Scenario 3 PO minus select sites plus Lodge Farm	Scenario 4 PO plus NW Rugby	Scenario 5 PO plus Lodge Farm
3	4	5	1 	2

6.2.43. There is a clear 'homes' case to be made for supporting one of the two higher growth scenarios for the reasons introduced in Section 5.2, not least a case for providing more fully for affordable housing needs (which suggests a case for NW Rugby over Lodge Farm, given that affordable housing need is concentrated at Rugby, although there is additionally a need to factor-in development viability).

6.2.44. The wider consideration is around supporting a good mix of sites in terms of size and geographic location and supporting sites with strong development viability, with a view to ensuring a smooth delivery trajectory (including delivery in the crucial early years of the plan period), minimising delivery risk, ensuring sites deliver a good mix of housing and supporting affordable housing delivery.

6.2.45. In this regard there is clear support for Scenario 1 over Scenarios 2 and 3. As has been discussed above, the variable medium-sized sites are all thought to have strong delivery and viability credentials (particularly the village sites) and there is likely to be good potential for growth at villages to provide for very locally arising needs (albeit these needs cannot be quantified).

6.2.46. In **conclusion**, the order of preference balances total growth quantum, support for a good mix of sites and a marginal preference for NW Rugby over Lodge Farm. With regards to significant effects, there could potentially be a need for a stepped housing requirement under Scenarios 2 and 3, i.e. a situation whereby the housing requirement is set below Local Housing Need (LHN) in the early years of the plan period (and then commensurately above LHN in later years) thus delaying providing for housing needs.

Landscape and townscape

Scenario 1 Preferred option (PO)	Scenario 2 PO minus select sites plus NW Rugby	Scenario 3 PO minus select sites plus Lodge Farm	Scenario 4 PO plus NW Rugby	Scenario 5 PO plus Lodge Farm
2	1	3	2	4

6.2.47. As an initial point, it should be noted that whilst it is appropriate to make reference here to Green Belt, and forthcoming Green Belt Assessment, Green Belt is not a landscape designation.

6.2.48. Taking the variable sites in turn:

- Brinklow (higher growth under Scenarios 1,3 and 4) – is located in the Green Belt, but the discussion above explains: *“The site relates very well to the settlement edge / village centre and has the potential to be well-contained in landscape / Green Belt terms, including noting a narrow flood zone / stream corridor (designated as a LWS, as most stream corridors are in the Borough).”* There appear to be quite limited views of / across the site, but access will be from a point on B4455 with clear historic character, and Coventry Way long distance path runs adjacent to the site. The site’s landscape sensitivity has been assessed as “medium/low”.
- Long Lawford (higher growth under Scenarios 1,3 and 4) – is located in the Green Belt and the discussion above explains: *“Rising topography to the south would assist with securing a degree of containment in Green Belt terms, but the situation is nonetheless challenging in this regard, noting that the site boundary does not align with field boundaries.”* There are some quite extensive views of / across the site and a footpath intersects the site that links to Rugby. However, the landscape assessment undertaken identifies the site as having overall Medium/low landscape sensitivity.
- Wolvey (higher growth under Scenarios 1,3 and 4) – is located in the Green Belt and the discussion above explains: *“The site is not very well-contained in landscape / Green Belt terms, but as a large site there should be good potential to work with land-owners on site masterplanning to ensure comprehensive scheme.”* There are views of / across the site from the B-roads approaching the village from both the west and (in particular) the south. However, again, there is overall medium/low landscape sensitivity.
- NE Rugby (higher growth under Scenarios 1,3 and 4) – this is an attractive undulating landscape on the edge of Rugby and two footpaths cross the site. Again, there is overall medium/low sensitivity.
- South Rugby (higher growth under Scenarios 1,3 and 4) – this is broadly a sensitive sector of land given the relationship between the edge of Rugby / Hillmorton and the Rains Brook valley / Oxford Canal to the south, as has been discussed. The site boundary has been defined with the specific aim of securing containment and minimising landscape impacts and there is some screening from important viewpoints. Nonetheless this is one of the more landscape sensitive sites assessed and it as has been identified as having “medium” landscape sensitivity.
- NW Rugby SUE (Scenarios 2 and 4) – located in the Green Belt, and whilst topography (a high point in the western part of the site) could assist with achieving containment, there could nonetheless be a concern regarding achieving a defensible long term Green Belt boundary. The bulk of the site is likely subject to limited landscape sensitivity, given the adjacent industrial area (also noting associated power lines). However, several important public rights of way cross the site, and there is a need to consider impacts associated with achieving good access at the southern extent of the site (Oxford Canal) and the northern extent of the site (Swift Valley and Cosford). Overall landscape sensitivity is “medium/low”.
- Lodge Farm (Scenarios 3 and 5) – the Inspectors Report for the adopted Local Plan discussed landscape sensitivity in detail, and since that time the site boundary has been expanded. This is a distinctly rural area experienced via expansive views across a flat landscape from the A45. Public rights of way intersect the site which link the Oxford Canal to Willoughby and Grandborough. Overall the site has been assessed as having “medium” sensitivity.

6.2.49. In **conclusion**, the most landscape sensitive sites are Lodge Farm and South Rugby, such that Scenario 2, which omits both of these sites, performs best, while Scenario 5, which includes both, performs least well. However, it should be noted though that there is broadly a case for taking a proactive approach to growth in Rugby recognising that landscape sensitivity at the sites in question is at most “medium”. Overall a ‘moderate or uncertain’ negative effect is predicted across the growth scenarios. There is also a need to consider in-combination effects with employment land allocations.

Resources

Scenario 1 Preferred option (PO)	Scenario 2 PO minus select sites plus NW Rugby	Scenario 3 PO minus select sites plus Lodge Farm	Scenario 4 PO plus NW Rugby	Scenario 5 PO plus Lodge Farm
=	=	=	=	=

6.2.50. A key issue to focus on here is loss of best and most versatile (BMV) agricultural land, which the NPPF classifies as land that is of grade 1, 2 or 3a quality.

6.2.51. The nationally available low resolution/accuracy dataset indicates that the only variable site option intersecting BMV agricultural land is Site 334 to the south of Rugby. However, the national dataset does not differentiate between grades 3 and 3a, and none of the sites have been surveyed in detail.

6.2.52. This is particularly surprising for Lodge Farm, given how long and actively the site has been promoted for; however, on the basis of the nationally available dataset it seems likely that the site does not comprise BMV quality land, as there is a nearby area of grade 4 quality land (albeit an area associated with flood risk). At NW Rugby it is noted that land adjacent to the east has been surveyed in detail and been found to comprise grade 3a quality land (i.e. BMV).

6.2.53. One other consideration is sterilisation of minerals resources accounting for Minerals Safeguarding Areas (MSAs) in the Warwickshire Minerals Plan, but it is inherently difficult to conclude significant concerns, as minerals safeguarding is not absolute. It is noted that extensive MSAs cover both NW Rugby and Long Lawford.

6.2.54. In **conclusion**, it is not possible to differentiate between the growth scenarios with any confidence. After having additionally accounted for constant site allocations and also employment sites, it is clear that the Local Plan will result in a quantum of BMV agricultural land that might be considered significant, but judging significance is inherently difficult (with a lack of guidance available on this topic). A final point to note is that the Borough is not obviously any more or less constrained than other neighbouring local authorities within the sub-region, such that this is not a factor in favour of lower or higher growth.

Transport

Scenario 1 Preferred option (PO)	Scenario 2 PO minus select sites plus NW Rugby	Scenario 3 PO minus select sites plus Lodge Farm	Scenario 4 PO plus NW Rugby	Scenario 5 PO plus Lodge Farm
1	2	2	3	3

6.2.55. Transport is a key issue for any Local Plan and the Rugby Local Plan is no exception. There is a need to direct growth in line with accessibility, to locations where there is good potential to reach key destinations by active or public transport, and away from traffic congestion hotspots (including because traffic is a barrier to active and public transport. Taking the variable options in turn:

- Brinklow, Long Lawford and Wolvey (higher growth under Scenarios 1,3 and 4) – Wolvey is notable as a rural village with a low accessibility score, but there is potential to improve the ‘sustainability’ of the village by delivering targeted new community infrastructure and also public transport enhancements. Across all three villages further consideration will need to be given to car dependency, traffic movements and bus connectivity.

- Rugby medium-sized extensions (higher growth under Scenarios 1,3 and 4) – both sites perform reasonably well in transport terms, although there are detailed matters for ongoing consideration regarding securing good walking / cycling connectivity. There is an existing bus service linking Rugby to Newton, albeit with a limited service, so a service enhancement should be considered.
- NW Rugby – achieving good access and walking / cycling connectivity would clearly be challenging, and there is also a need to consider the potential to secure high quality bus connectivity.
- Lodge Farm – this is clearly a rural location, with limited potential to reach key destinations by walking / cycling (beyond what can be delivered within the site). However, there is thought likely to be good potential to secure a new or enhanced bus service between Rugby and Daventry, which would benefit communities over-and-above the new community at Lodge Farm. A key issue though is the A426 / B4429 junction in the centre of Dunchurch, and it is difficult to envisage a solution, including likely no potential to deliver an eastern bypass to the village (given heritage constraints).

It is also noted that when preparing the adopted Local Plan there was discussion of Lodge Farm having the potential to contribute funding to infrastructure enhancements associated with the SW Rugby SUE, potentially to include transport infrastructure. However, it may be that this is no longer a particular opportunity to explore, given subsequent work that has been undertaken around SW Rugby infrastructure planning and delivery mechanisms. In turn, there is a need to question whether a better time to consider Lodge Farm could be in the future once the infrastructure has delivered, and there is a good understanding of residual issues and further enhancement opportunities.

- 6.2.56. In **conclusion**, the key issue is potentially around traffic affecting the Rugby urban area including Dunchurch, in the context of recent, committed and future growth. On this basis there is support for Scenario 1, albeit there are drawbacks to a strategy involving an element of ‘dispersal’ to villages.
- 6.2.57. With regards to NW Rugby vs Lodge Farm, it is not possible to conclude a preference at this stage.
- 6.2.58. Finally, with regards to significant effects, there is a need to conclude negative effects for all scenarios at this stage because Strategic Transport Assessment work is yet to be completed and, on balance, it is considered appropriate to flag a risk of a ‘significant’ negative effect for the two higher growth scenarios.

Water

Scenario 1 Preferred option (PO)	Scenario 2 PO minus select sites plus NW Rugby	Scenario 3 PO minus select sites plus Lodge Farm	Scenario 4 PO plus NW Rugby	Scenario 5 PO plus Lodge Farm
=	=	=	=	=

- 6.2.59. The ‘Stage 1’ Water Cycle Study (WCS, 2024) considers a range of issues, but it is capacity at sewage treatment works (STWs) that is typically a primary issue with a bearing on spatial strategy (both hydraulic capacity, to avoid spills of untreated wastewater, and the environmental capacity of the watercourse receiving treated wastewater). Whilst upgrades are often possible, there can be issues, such that growth should be directed in line with capacity or known potential for upgrade.
- 6.2.60. Focusing on wastewater treatment, the conclusion of the WCS is as follows:

Sewerage Undertakers have a duty... to provide sewerage and treat wastewater arising from new domestic development. Except where strategic upgrades are required to serve very large or multiple developments, infrastructure upgrades are usually only implemented following an application for a connection, adoption, or requisition from a developer. Early developer engagement with STW is therefore essential to ensure that sewerage capacity can be provided without delaying development.

Early engagement with STW is required, and further modelling of the network may be required at the planning application stage. Three storm overflows on the network exceeded the threshold for investigation by the EA.

... STW provided assessments of the Wastewater Treatment Works (WwTW) serving growth in each scenario based on hydraulic capacity and headroom in the environmental permit... While the proposed growth in the sub-region can be accommodated at a number of WwTW, some treatment works could require upgrades to ensure growth can occur without causing the flow permits being exceeded.

Early engagement with STW would be required at the planning application stage to ensure that growth is aligned with provision of capacity at WwTW.

... An increase in the discharge of effluent from WwTW as a result of development and growth in the area which they serve can lead to a negative impact on the quality of the receiving watercourse. Under the Water Framework Directive (WFD), a watercourse is not allowed to deteriorate from its current WFD classification (either the overall watercourse classification or for individual elements assessed).

This Stage 1 Scoping Study presents the current status of waterbodies within the study area and gathers the data required to model the impact of growth during the plan period on water quality. It is recommended that the modelling of water quality is carried out in a Stage 2 Outline Study.”

- 6.2.61. In **conclusion**, it is difficult to conclude any concerns regarding impacts of growth on STW / WwTW capacity (or the capacity of storm overflows elsewhere on the network), nor to suggest any particular opportunity in terms of directing growth so as to fund targeted upgrades. The views of the water company and the Environment Agency on growth-related issues / opportunities of relevance to the appraisal of reasonable alternative growth scenarios would be welcome through the consultation.

Appraisal summary

- 6.2.62. The table (or ‘matrix’) below presents a summary of the appraisal presented above. Within each row, the aim is to **1)** rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence); and then **2)** categorise performance in terms of significant effects using **red** (significant negative) / **amber** (moderate/uncertain negative) / **light green** (moderate/uncertain positive) / **green** (significant positive) / no colour (neutral).
- 6.2.63. Scenario 1 is clearly shown to perform well. However, it is not necessarily the case that this is the best performing scenario overall, because the appraisal is not undertaken with any assumptions made regarding the degree of importance / weight that should be assigned to each of the topics (such that the intention is not that the matrix should be used to calculate a total score for each of the scenarios).
- 6.2.64. It is important to note that Scenario 1 is not the best performing scenario in terms of biodiversity, communities, homes and landscape, and the Council, as decision-makers, might choose to give particular weight to one or more of these topics. Also, it is clearly the case that a number of appraisal conclusions are finely balanced, for example it is difficult to reach a conclusion under the ‘historic environment’ heading at this stage, but it should be possible at the next stage of plan-making in light of new evidence gathered through the current consultation.
- 6.2.65. It is then much more difficult to differentiate between the other four scenarios because all are associated with pros and cons. It could be suggested that Scenario 3 performs poorly overall, noting it only performs equal best under one topic, is associated with a range of negative effects and is not associated with any predicted significant positives. However, it does not necessarily perform poorly to the extent that it can now be judged unreasonable, i.e. it does warrant ongoing consideration.

Table 6.1: Housing growth scenarios appraisal summary

Scenario	Scenario 1 Preferred option	Scenario 2 PO minus select sites + NW Rugby	Scenario 3 PO minus select sites + Lodge Farm	Scenario 4 PO + NW Rugby	Scenario 5 PO + Lodge Farm
Topic	Order of preference (numbers) and predicted significant effects (shading)				
Accessibility	★1	3	5	2	4
Air quality	★1	2	3	4	5
Biodiversity	2	2	2	★1	★1
CC adaptation	★1	★1	2	★1	2
CC mitigation	★1	3	2	2	★1
Communities	2	★1	★1	2	2
Economy / employment	=	=	=	=	=
Historic env.	=	=	=	=	=
Homes	3	4	5	★1	2
Landscape	2	★1	4	3	5
Resources	=	=	=	=	=
Transport	★1	2	2	3	3
Water	=	=	=	=	=

6.3. Employment land growth scenarios appraisal

Introduction

6.3.1. The aim here is to appraise the three reasonable growth scenarios introduced in Section 5, namely:

- The emerging preferred option (PO) involving allocation of Sites 95, 64, 17, 14 and 328.
- The PO but replace Site 328 (Prologis Park West and Mountpark) with Site 130 (North of Houlton).
- The PO but replace Site 328 with Sites 18 and 133 (A45/A4071 junction southwest of Rugby).

Appraisal

6.3.2. A lighter touch approach to appraisal is taken relative to the approach taken above. Specifically, Table 6.2 presents a summary appraisal matrix and this is then followed by a discussion.

N.B. see discussion of appraisal methodology in Section 6.2.

Table 6.2: *Employment land growth scenarios appraisal*

Scenario	Scenario 1 Preferred option inc. 328	Scenario 2 Replace 328 with 130	Scenario 3 Replace 328 with 18 and 133
Topic	Order of preference (numbers) and predicted significant effects (shading)		
Accessibility	1	2	3
Air quality	=	=	=
Biodiversity	=	=	=
CC adaptation	2	2	1
CC mitigation	=	=	=
Communities	1	1	2
Economy / employment	1	2	2
Historic env.	1	1	2
Homes	=	=	=
Landscape	2	1	1
Resources	1	2	1
Transport	1	2	2
Water	=	=	=

6.3.3. As an initial point to note, there are several topic heading that are of limited relevance to this current appraisal and need not be considered further, namely: climate change mitigation; homes and water.

6.3.4. The remaining topic headings are discussed in turn below:

- **Accessibility** – at both Site 328 and Site 130 there is an opportunity to deliver significant new open space, but the opportunity is much more significant in the case of Site 328. Specifically, there is an opportunity to deliver very well targeted enhancements to the River Avon corridor and a 55ha country park alongside the River Avon contiguous with the existing country park west of the Avon and also linking with Ryton Pools Country Park. With regards to Sites 18/133 there is less clear opportunity as the sites are much smaller, but it is noted that Site 18 is public sector owned land.
- **Air quality** – both Coventry and Rugby are significantly constrained in terms of air quality, but there is reason to suggest that Site 328 is the preferable of the three variable employment growth locations in transport terms, which could translate into stronger performance in air quality terms. However, it is not possible to draw this conclusion with any certainty.
- **Biodiversity** – at both Site 328 and Site 130 there is an opportunity to deliver enhancements to a river / stream corridor. The opportunity is more significant at Site 328, but equally the river corridor here is associated with more extensive biodiversity sensitivity (“high” sensitivity). Whilst biodiversity net gain (BNG) requirements are acknowledged, it is equally the case that there is a need to avoid issues in the first instance ahead of relying on mitigation (in line with the mitigation hierarchy).

Finally, at adjacent Sites 18 and 133 there appears to be notably limited biodiversity constraint.

- **Climate change adaptation** – both Sites 328 and 130 are adjacent to significant flood risk zones. In both cases there would/should be good potential to avoid development in the flood risk zone, but there is some uncertainty recognising that it is not uncommon to accept some flood risk in the context of employment land. In turn, there is also a need to consider the possibility of worsening downstream flood risk, which is potentially a greater concern for Site 130.
- **Communities, health and wellbeing** – the country park opportunity at Site 328 is considerable, such that it warrants factoring-in here, as well as above under ‘accessibility’. The country park would be well placed to benefit both Ryton-on-Dunsmore and communities within Coventry (also those who work in the area). With regards to Site 130, whilst the country park opportunity is considered to be less significant, it is acknowledged that new employment land here could potentially compliment the new community at Houlton to the south, plus the employment land would be accessible from Rugby. At Rugby there is an existing issue of Houses in Multiple Occupation (HMOs) but it is difficult to suggest that this serves as a reason for limiting further growth in strategic logistics / warehousing.

Sites 18 / 133 perform less well as there is a concern regarding affecting the delivery of SW Rugby. Also, these sites could be less well-suited to delivering new Gypsy and Traveller pitches (whilst this is understood to be a strong possibility at Site 328 and might also be a possibility at Site 133).

- **Economy / employment** – there is a very strong case for directing new employment land to the southeast edge of Coventry in the vicinity of the A45/46 junction, as this is clearly a hub of economic agglomeration that is of larger-than-local importance. Furthermore, the site is understood to have good potential to deliver a mix of employment land, to include 8,000m² of floorspace in small to medium size buildings (with unit sizes ranging from 185m² up to 1,500m²) to provide space for small and medium sized enterprises. In contrast, it seems likely that Site 130 and Sites 18/133 would be suited to delivering strategic logistics (warehousing and distribution), although there could be some opportunity to deliver other types of employment land at Site 18 which comprises public sector land.

With regards to significant effects, there is also a need to account for the four employment land allocations that are held constant across the growth scenarios (of which one is permitted and two are somewhat committed, leaving Ansty Park North as the sole allocation that is entirely uncommitted). Overall any of the scenarios would amount to a proactive strategy (although there is a need for ongoing consideration of potential small / medium-sized allocations, as discussed in Sections 5.4).

- **Historic environment** – Sites 18/133 are constrained by two nearby conservation areas. Finally, there could be archaeological constraint at Site 130 (Watling Street), but this is unknown.
- **Landscape** – Sites 18/133 have “low/medium” sensitivity and are located outside of the Green Belt, although there is the matter of maintaining a landscape gap between Rugby and Thurlaston / Dunchurch, also noting two proposed residential allocations to the west of Dunchurch.

Site 338 is then potentially constrained in Green Belt terms (subject to ongoing work to consider whether this land comprises Grey Belt) but is well contained and adjacent Prologis Park and strategic road infrastructure act as major urbanising influences; overall sensitivity is “medium/low”.

Finally, Site 130 is located outside of the Green Belt and has “low” sensitivity (such that it is the least sensitive site) but development would urbanise an otherwise quite rural landscape. Whilst there is some adjacent built form, and it would be possible to draw upon topography and Lilbourne Road for some containment, the possibility of ongoing ribbon development along the A5 can be envisaged.

- **Resources** – focusing on agricultural land quality, whilst none of the sites have been surveyed in detail, the nationally available dataset potentially serves to suggest a high likelihood of at least parts of Site 130 comprising BMV agricultural land. Specifically, it shows the site to comprise a mix of ‘urban’ land (which is clearly in error) and grade 2 quality land (i.e. land that is BMV).
- **Transport** – Site 338 is considered to perform very well given links to the strategic road network and proximity to Coventry. At Site 130 there would be potential to link to a new Rugby Parkway station to the south, but there would nonetheless be concerns regarding traffic along the A5, including in-combination impacts given an expanding Magna Park to the north and an expanding DIRFT to the south. Finally, at Sites 18/133 the clear concern is around in-combination impacts with committed growth at SW Rugby and traffic through the historic centre of Dunchurch.

- 6.3.5. Overall, Scenario 1 is clearly shown to perform well, as it performs best under the greatest number of topic headings and is assigned the greatest number of positive effects and the fewest negatives. However, as per the equivalent discussion in Section 6.2, it is not necessarily the case that this is the best performing scenario overall, because the appraisal is not undertaken with any assumptions made regarding the degree of importance / weight that should be assigned to each of the topics (such that the intention is not that the matrix should be used to calculate a total score for each of the scenarios).

7. The preferred approach

Introduction

7.1.1. The following text was prepared by RBC Officers (not AECOM) and does not amount to an appraisal.

Reasons for supporting the preferred approach

7.1.2. The appraisal of the two sets of growth scenarios presented above serves as an important check and challenge ahead of consultation. It is acknowledged that the work did not feed in to elected councillor decision-making, but the work is still considered suitably proactive, recognising that the plan is at the Regulation 18 consultation stage with further plan-making to follow and then Regulation 19 publication.

7.1.3. With regards to the **housing growth scenarios**, the appraisal lends clear support for the preferred option (Scenario 1) but also serves to highlight the need to keep under review the potential for higher growth. Officers will take close account of consultation responses received on this matter from neighbouring local authorities and other key stakeholder organisations.

7.1.4. As discussed, the preferred strategy involves an element of dispersal (at least in terms of new proposed allocations, less so the overall housing land supply) and it is acknowledged that there will be a need for ongoing consultation with parish councils and others regarding growth-related issues and opportunities at certain villages, including those that are a variable across the growth scenarios.

7.1.5. Finally, with regards to the question of introducing NW Rugby or Lodge Farm, two key points to note are:

- The appraisal potentially suggests a preference for NW Rugby, but its deliverability is uncertain, and this is a key consideration, such that for this site to be considered a 'reasonable' option moving forward there would be a need for further detailed evidence if it is to remain in contention.
- Under Scenarios 2 and 3 the robustness of the housing land supply as a whole would be called into question, such that the Borough might need to argue for a stepped requirement or be willing to accept a risk of facing the presumption in favour of sustainable development (to be avoided).

7.1.6. With regards to the **employment land growth scenarios**, the appraisal lends clear support for the preferred option (Scenario 1), which is important as there may be a need to demonstrate 'exceptional circumstances' in order to justify directing growth to the Green Belt ahead of to land beyond the Green Belt (pending forthcoming Green Belt Assessment work, which will identify Grey Belt).

7.1.7. A key consideration for Officers is a balanced employment land supply across the Borough and co-locating employment with the key population centres and housing growth areas. In this light there is a case for supporting Site 328 ahead of the alternative sites on the edge of Rugby, and a further key consideration is understanding of transport constraints and opportunities, albeit it is acknowledged that this will be a matter for further detailed investigation subsequent to the current consultation, and it is also acknowledged that Site 130 (North of Houlton) would benefit from proximity to Rugby Parkway Station.

7.1.8. Furthermore, the Site 138 (Prologis Park West and Mountpark) represents a unique opportunity:

- It would deliver a 55ha country park alongside the River Avon (contiguous with the existing country park west of the Avon and would also link with Ryton Pools Country Park). No other site opportunity can deliver habitat creation on this scale, in the context of the Corporate Strategy objective for a greener Rugby.
- It would deliver a new on-site training centre and land that would be ring-fenced for smaller units (particularly that part of the site that is owned by the County Council, and allocating for expansion here has clustering and agglomeration benefits which would support more higher-skilled jobs and expansion in high value-added industries.

7.1.9. These opportunities are not replicable in more distribution-focussed locations along the A5 north of Rugby (Site 130), whilst Sites 18/133 raise significant concerns about their in-combination transport effects with committed development at South West Rugby and on creating sprawl by eroding the settlement separation between Thurlaston, Dunchuch and Rugby..

Part 2: SA findings at this stage?

8. Introduction to Part 2

8.1.1. The aim here is to present an appraisal of the Draft Local Plan as a whole under the SA framework.

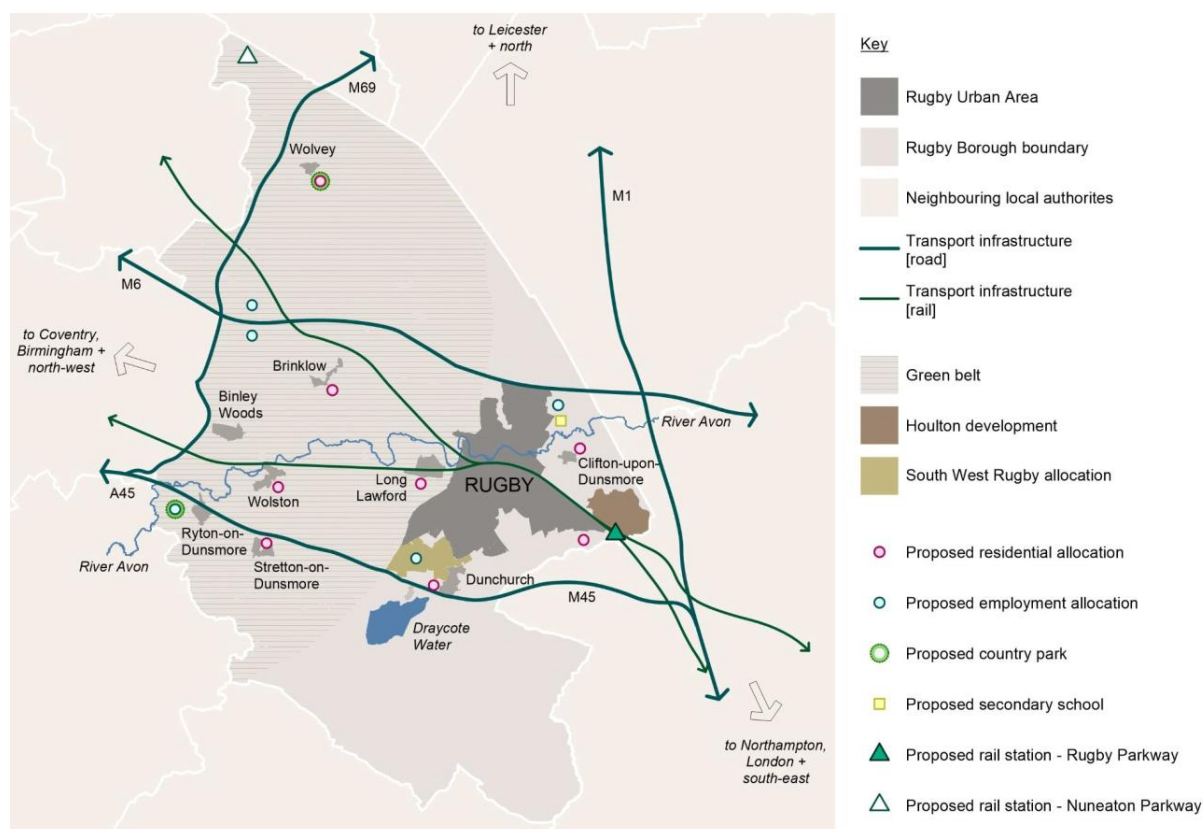
8.1.2. The Draft Local Plan, it presents around 50 policies under the following headings:

- Strategy
- Climate
- Economy
- Centres
- Environment
- Housing
- Wellbeing
- Design
- Infrastructure

8.1.3. Clearly it is the 'strategy' that must be a focus of the appraisal, given a need for the appraisal to focus on 'significant effects' and the strategy is summarised in a key diagram – see Figure 8.1. Within the Strategy section of the Local Plan sections cover:

- Settlement hierarchy – need not be a focus as this is primarily an objective matter.
- Strategy for homes and jobs – set out needs/requirements and so a key focus.
- Allocations for homes and jobs – equally a focus.
- Gypsies and Traveller – an important focus (as discussed).
- Countryside protection – fairly generic policy that need not be a focus.
- South West Rugby – not a main focus as mostly already committed.

Figure 8.1: The Local Plan Key Diagram



9. Draft plan appraisal

9.1. Introduction

- 9.1.1. The aim here is to present an appraisal of the Draft Local Plan as a whole under the SA framework.
- 9.1.2. In practice this means building upon the appraisal of the preferred housing growth scenario (Scenario 1 appraised in Section 6.2) and the appraisal of the preferred employment land growth scenario (Scenario 1 appraised in Section 6.3) additionally accounting for site specific policies (which cannot be fully accounted for when appraising growth scenarios with a view to avoiding bias) and other area-wide / thematic policies within the plan (which can be termed development management (DM) policies).
- 9.1.3. The appraisal is light touch in the knowledge that further work can be undertaken post consultation.

9.2. Accessibility

- 9.2.1. The appraisal in Section 6.2 is very strongly supportive of the housing growth strategy because there is a major focus on addressing community infrastructure capacity issues and realising opportunities, particularly in respect of school capacity. In particular, there is support for: Site 59 to the **northeast of Rugby**, which would deliver a secondary school alongside a very modest number of homes; the growth strategy at **Wolvey** that would deliver significant new community infrastructure (although this is a rural village with an existing low settlement score); the strategy for **Brinklow**, albeit growth would support new school capacity at Monks Kirby (~5km distant); and the strategy for **Long Lawford**, which is well-linked to Rugby and where there are potentially growth-related opportunities (to be confirmed).
- 9.2.2. With regards to employment land, the appraisal in Section 6.3 is strongly supportive of the preferred strategy, because Site 138 (**Prologis Park West and Mountpark**) would deliver a 55ha country park alongside the River Avon (contiguous with the existing country park west of the Avon).
- 9.2.3. As for aspects of the growth strategy held constant across the growth scenarios, perhaps the key point to note is the proposed restricted or low growth strategy for certain villages, perhaps most notably **Wolston**, on the basis of community infrastructure / accessibility factors.
- 9.2.4. With regards to site **specific policy**, a clear and well-targeted approach to setting out requirements for directing limited funds / making use of limited land (in the context of potentially challenging development viability) is to be commended. Policies set requirements in respect of:
- Public rights of way (19 sites)
 - Pedestrian crossings or footways to ensure safe access (around 8 sites)
 - Travel links in support of active travel (around 10 sites).
 - Children's play areas (five sites, and in once case this must be a 'central feature').
 - Allotments / community orchards (two sites)
- 9.2.5. Also, it is noted that there is support for higher density developments in two sites in highly accessible locations, one within the town centre and another adjacent to anticipated Rugby Parkway Station.
- 9.2.6. Finally, with regards to **DM policy**, there are a range of policies that are broadly supportive of accessibility objectives, but these are mainly fairly generic policies that need not be a focus of appraisal (including noting forthcoming National Development Management Policies, NDMPs). No policies stand-out as giving rise to a tension with accessibility objectives, although car parking policy is always a policy area that generates interest and warrants ongoing scrutiny.
- 9.2.7. In **conclusion**, the Draft Local Plan is predicted to give rise to a **significant positive effect** on the baseline. Moving forward it will be important to give further detailed consideration as to how best to realise growth-related opportunities through: spatial strategy / site selection; ensuring that comprehensive growth is supported ahead of piecemeal growth as far as possible; and setting clear site-specific policy so that developers understand local priorities in the context of development viability.

Air quality

- 9.2.8. The appraisals in Sections 6.2 and 6.3 are supportive of the growth strategy, although there is a need for ongoing scrutiny informed by **forthcoming strategic transport assessment** given the AQMAs affecting both Rugby and Coventry. As part of this, there will be a need to consider: A) the focus of growth at Rugby; B) the element of 'dispersal' that is support (i.e. directing growth to villages); and B) the proposal to direct a significant proportion of growth to locations in proximity to Coventry.
- 9.2.9. With regards to aspects of the growth strategy that are not a focus of the appraisals above on account of being held constant across the growth scenarios, perhaps a key point to note is that directing employment land to Ansty Park North is supported given excellent connectivity to the strategic road network (SRN), and it may be that enabling the Park to grow / reach a critical mass is supportive of bus connectivity; however, the Park is quite distant from a train station. It is also appropriate to flag directing further employment land to SW Rugby as giving rise to tensions with transport / air quality objectives although, on the other hand, the effect will be to facilitate delivery of major road / transport upgrades (and it is important to recall that this is an existing reserve site, such that it is to some extent committed).
- 9.2.10. Site specific policies do not reference air quality, which is reasonable and appropriate given a need for concise policies targeted at key issues/opportunities, whilst numerous DM policies are supportive of transport objectives and, in turn, air quality objectives. Given the local Air Quality constraints there is support for **Policy EN8 (Air quality)** which requires:
- A. Development throughout the borough of more than 1,000m² of floorspace or 10 or more dwellings and development within the Air Quality Management Area that would generate any new floorspace must: i. achieve or exceed air quality neutral standards, or ii. address the impacts of poor air quality due to traffic on building occupiers, and public realm or amenity space users by reducing exposure to and mitigating their effects, proportionate to the scale of the development.*
- 9.2.11. In **conclusion**, whilst there is a case for flagging a precautionary negative effect at this early stage of the plan-making process and ahead of strategic transport assessment an overall **neutral effect** is predicted on balance, including recognising that air quality is improving nationally. It will be important to ensure that strategic transport assessment is undertaken in light of growth elsewhere in the sub-region and mindful of cross-border / larger than local transport issues and opportunities.

Biodiversity

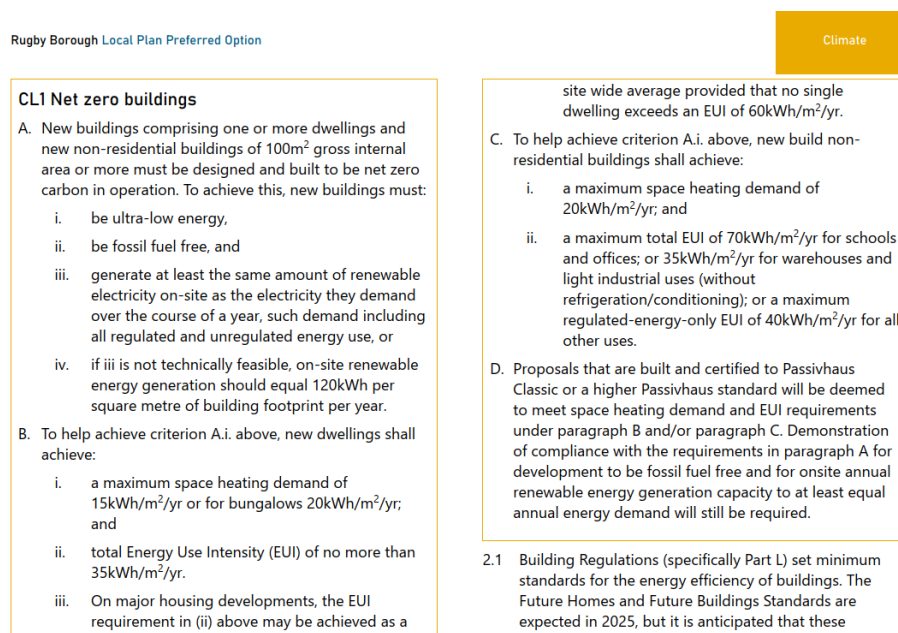
- 9.2.12. The appraisal of housing growth scenarios in Section 6.2 does not flag a concern but suggests a possible case for supporting **higher growth** given clear potential to direct growth to locations with limited/low biodiversity constraint in the context of a wider sub-region where biodiversity is a notable constraint to growth. The appraisal of employment land growth scenarios in Section 6.3 is then tentatively supportive of the preferred strategy because whilst Site 138 (**Prologis Park West and Mountpark**) is associated with the sensitive River Avon valley there is a major opportunity to deliver well-targeted enhancements to the river corridor.
- 9.2.13. As for aspects of the growth strategy held constant across the growth scenarios:
- **Site 100 at Ryton-on-Dunsmore** (35 homes) – is a designated LWS but also an identified reserve site for housing in the made Ryton-on-Dunsmore Neighbourhood Plan (2021), plus a recent planning application was recommended for approval but then refused on the grounds of car parking.
 - **Site 337 at Brinklow** (75 homes) – is predominantly PDL is constrained at its northern edge by a LWS, and it is recommended that site-specific policy by make reference to this.
 - Site 40 at Rugby (135 homes) is adjacent to the Oxford Canal, but site-specific policy requires: *“Development should come forward in accordance with a master plan which is produced in consultation with the Canal & River Trust.”*
 - Brinklow – is associated with a sensitive river corridor, but there is limited priority habitat and there appears likely to be a growth related biodiversity opportunity (to be further investigated).
 - Binley Woods / Wolston / Ryton-on-Dunsmore – the proposed low growth housing strategy is of note as this part of the Borough is arguably most sensitive in biodiversity terms.

- 9.2.14. With regards to **site-specific policy**, as touched upon above there is a case for reviewing policy requirements around protecting/enhancing LWSs (only one is mentioned and the site in question already has planning permission). Otherwise, it is noted that a small number of policies make reference to retaining mature trees or field boundaries (again, the possibility of additional policy requirements could be considered, albeit in the context of not wishing to unduly hinder site masterplanning and, in turn, site delivery in the context of potentially challenging development viability and wider objectives).
- 9.2.15. Finally, with regards to **DM policy**, the key point to note is a proposal not to require a level of biodiversity net gain over-and-above the statutory minimum. It is not uncommon for local plans nationally to require 20%, but understanding nationally regarding implications for development viability and site delivery more widely (given practical challenges around securing biodiversity 'credits' where the requisite net gain cannot be achieved on site) is still evolving at the current time.
- 9.2.16. In **conclusion**, there are no major concerns (in the context of local plans elsewhere that must factor-in biodiversity as a major constraint with a bearing on growth quantum and spatial strategy / site selection) but there are several sites subject to a degree of constraint that warrant ongoing scrutiny, plus it will be important to gain the views of key stakeholder organisation on the potential to realise biodiversity opportunities, most notably at Prologis Park West and Mountpark (strategic employment allocation). Overall the local plan is predicted to have a **neutral effect** on the baseline (a situation is one whereby development would continue to come forward without the benefit of an up-to-date plan).

Climate change mitigation

- 9.2.17. The appraisal in Section 6.2 is supportive of the preferred growth strategy but highlights the importance of taking all possible steps to ensure that built environment decarbonisation / net zero development opportunities are realised through **spatial strategy and site selection**, to include a focus on directing growth in line with understanding of development viability challenges.
- 9.2.18. The final matter to consider here is **Policy CL1 (Net zero buildings)** which is of crucial importance, and represents a key choice being made through the Local Plan, given that the policy has viability implications that that there can be a need to accept compromises in terms of wider objectives.
- 9.2.19. There has been much debate nationally regarding the form that net zero development policies (or policies that otherwise require standards over-and-above Building Regulations) should take, but the draft policy below arguably represents best practice. Amongst other things, the policy is clear / easily understood such that it should allow for effective interrogation of planning applications and decisions. This is in the context of it often being very difficult to effectively scrutinise the emissions/energy performance of planning applications using the complex Buildings Regulations methodology.

Figure 9.1: Draft policy on net zero development



- 9.2.20. A further possibility is adding an additional policy relating to minimising ‘**embodied**’ emissions, as is quite common amongst emerging local plans nationally at the current time. However, understanding regarding how to set policy that is viable and effective is still evolving nationally.
- 9.2.21. In **conclusion**, whilst it is difficult to conclude that built environment decarbonisation has been a strong focus of spatial strategy / site selection, close consideration has been given to supporting sites with strong development viability credentials such that there is confidence in the ability for allocations to come forward in accordance with Policy CL1, i.e. come forward as net zero development. It is also the case that the Council has not committed to achieving net zero development borough-wide by a particular date (e.g. 2030 as is quite common amongst local authorities nationally) such that, on balance, it is considered appropriate to predict a ‘**moderate or uncertain**’ positive effect. See Box 9.1.

Box 9.1: Development viability

This is a key consideration for the local plan, as has been discussed.

A Viability Study has been prepared, but there is a need for further work, most notably to consider the cumulative viability effects of education contributions and net zero development policy. In particular, the study does not yet factor in the potential scale of s106 education contributions to deliver the proposed new secondary school.

Key findings from the Study include:

- Affordable housing – *“While there is a range of viable percentages, depending on sales values, type of scheme and benchmark land value, the emerging policy requirement can be achieved in most scenarios. A limited amount of scheme-specific testing may be required at the development management stage, particularly on sites brought forward on previously developed land in the Rugby Urban Area.”*
- Net zero development – *“The cost of achieving net zero carbon in developments varies and we have tested two scenarios which reflect the range of cost estimates (scenario 1 models a 5% increase in costs and scenario 2 models a 7.5% increase in costs). When scenario 1 costs are applied, the impact on residual land values is around 38% on average in the Rugby Urban Area and 26% elsewhere. With the higher scenario 2 costs, the residual land values fall by an average of 57% in the Rugby Urban Area and 39% elsewhere. As more developers start to use on-site technologies, the costs are likely to fall...”*
- Community infrastructure – *“Policy 16 requires that developments contribute towards the provision of education. Our appraisals test the impact of contributions totalling £5,000, £10,000 and £15,000 per unit, and higher contributions clearly have an impact on the ability of developments to meet other policy objectives, notably affordable housing. When the emerging policies are tested on a cumulative basis and having regard to the Borough’s housing land supply being predominantly greenfield sites, developments in the Borough will be able to absorb the cumulative impact of the emerging policies in most cases.”*
- Strategic sites – *“We have tested development typologies which are reflective of the major strategic sites that are likely to come forward over the plan period. We have incorporated estimates for infrastructure costs, based on national benchmarks, given that there is no information on site-specific requirements at this stage. Our appraisals indicate that the strategic sites are viable and deliverable, although some flexibility on the timing and/or percentage of affordable housing may be required in the short term.”²¹*

Climate change adaptation

- 9.2.22. Focusing on **flood risk**, as a key climate change adaptation consideration, the appraisal of reasonable alternative growth scenarios in Section 6 does not flag any major concerns. Potentially of primary importance will be confirming that Site 338 **Prologis Park West and Mountpark**, which is a major new strategic employment allocation, can be brought forward whilst avoiding development in the flood zone and avoiding the worsening of downstream flood risk (it could well be that it can deliver a betterment).
- 9.2.23. With regards to sites that are not a focus of appraisal in Section 6 on account of being held constant across the growth scenarios appraised, flood risk is not thought to be a significant constraint at any of the sites in question.

²¹ The study goes on to explain: *“Alternative funding sources, most likely from Homes England, may be available to address short term viability issues... Alternatively, the Council could consider deploying CIL in kind if viability issues emerge at the development management stage, given the extensive on-site provision of community infrastructure on strategic sites. This is likely to be a preferable option to reviewing the Charging Schedule and adopting lower CIL rates...”*

- 9.2.24. Ansty Park North is notable as a large sites (employment) that is adjacent to a fluvial flood zone, with some flood risk affecting an employment area in Coventry a short distance downstream, but there should be good potential to avoid development intersecting the flood zone and to deliver Sustainable Drainage Systems (SuDS) such that surface water runoff rates are not increased.
- 9.2.25. None of the site specific policies reference flood risk or sustainable drainage, but this does not necessarily generate any concerns (to be confirmed following consultation with the EA). There are then area-wide DM policies covering flood risk, sustainable drainage and climate change adaptation, but all are fairly standard policies (in the context of forthcoming National Development Management Policies).
- 9.2.26. In **conclusion**, directing growth away from areas of flood risk sensitivity has clearly been a key factor influencing spatial strategy / site selection, although there remain some minor questions at the current time ahead of further work on site masterplanning and site-specific policy. A **neutral effect** is predicted.

Communities, health and well-being

- 9.2.27. The appraisal in Section 5.2 supports the proposed growth strategy in absolute terms but flags a potential argument for replacing some **growth at villages** with a strategic urban extension to Rugby.
- 9.2.28. With regards to sites that are not a focus of appraisal in Section 6 on account of being held constant across the growth scenarios appraised, one point to note here is the matter of growth at **Clifton-upon-Dunsmore**. As discussed in Section 5.4, the approach to growth is held constant across the growth scenarios appraised only on balance, i.e. there is potentially a choice to be explored, and comments from the Parish Council and any other interested parties would be welcome through the consultation.
- 9.2.29. With regards to area-wide and thematic DM policies, there are extensive requirements aimed at ensuring that development comes forward in line with communities, health and well-being objectives, including the site specific policy requirements discussed above under the ‘accessibility’ heading.
- 9.2.30. Two key area-wide policies of note are:
- W1 (Protection of community facilities) – amongst other things explains: *“The council supports the restoration of Coventry Stadium, Brandon for speedway and stock car racing and other motor sports together with other community uses. Planning permission will not be granted for development proposals which would conflict with these objectives.”*
 - W2 (Open space and sports provision) – sets out clear quantified requirements, which are then supplemented through site-specific policy as appropriate.
- 9.2.31. In **conclusion**, whilst it is recognised that there are some local community concerns with the proposed growth strategy, the proposed approach to spatial strategy / site selection has a clear focus on minimising negative effects and realising opportunities. The Council has taken the voluntary step of consulting on a full Draft Local Plan under Regulation 18 such that there will be good potential to take account of all feedback received from communities following the consultation / when preparing the final draft (‘Proposed Submission’) version of the Local Plan for publication under Regulation 19. Overall it is considered appropriate to predict a **‘moderate or uncertain’ positive effect** on the baseline (a situation whereby development continues to come forward in the absence of an up-to-date Local Plan).

Economy and employment

- 9.2.32. The appraisal of growth scenarios presented in Section 6 is very strongly supportive of the proposed growth strategy. The only ‘constant’ non-committed allocation not discussed in Section 6 is **Ansty Park North**, which is very strongly supported as there is a need to build on the success of Ansty Park.
- 9.2.33. However, and as discussed, there is a need to consider one or more **small or medium sized allocations** for industrial land. Also, there will be a need for further/ongoing work to confirm what types of employment land can or are likely to be delivered at each of the proposed allocations.
- 9.2.34. Finally, with regards to the seven area-wide policies presented under the ‘Economy’ and ‘Centres’ headings within the Local Plan, most are quite standard policies that need not be a focus of appraisal, but the Rugby Town Centre policy is clearly of note for reflecting a targeted approach to addressing specific issues / realising opportunities. On this point, it can also be noted that the plan only allocates two modest sites in the town centre, but if further sites become available this could be revisited.

9.2.35. In **conclusion**, a **significant positive effect** is predicted. The views of the development industry, neighbouring local authorities and any stakeholder organisations with a strategic (even larger-than-local perspective) in respect of realising economic growth opportunities through the Local Plan will be taken into account when finalising the Local Plan for publication subsequent to the current consultation.

Historic environment

9.2.36. The appraisal in **Section 6.2 flags a concern** with the proposed housing growth strategy, but it is not possible to identify an alternative strategy that is preferable in terms of historic environment objectives. There is a case for reconsidering certain of the small medium-sized allocations, but the effect could well be that there is a need to consider allocation of a new strategic growth location, and the two shortlisted options are both subject to a degree of historic environment constraint.

9.2.37. With regards to sites that are not a focus of appraisal in Section 6 on account of being held constant across the growth scenarios appraised, attention focuses on:

- **Site 337** at Brinklow (75 homes) – is predominantly PDL, well-contained in landscape / Green Belt terms and adjacent to the village centre, but there is historic environment sensitivity as the edge of the site includes a Grade II listed farm building and intersects the conservation area. There is also a need to consider potential in-combination effects with a larger proposed allocation to the south.
- **Site 129** at Clifton-upon-Dunsmore (60 homes) – the conservation area is adjacent, and it is also important to note an omission site to the south that comprises the former grounds of Clifton Hall (albeit not listed).
- **Dunchurch** – the proposal is to allocate to residential sites to the west of the village and also to support employment land at an existing reserve site within the nearby SW Rugby SUE. Land to the west of Dunchurch is much less sensitive than land to the east, but there is a need to consider in-combination traffic impacts, because the village centre crossroads is a key sensitivity.
- **Binley Woods** – the proposal not to allocate here is of note as the village has low historic environment sensitivity, having developed as a new settlement in the 20th century.

9.2.38. With regards to site-specific policy, there are a small number of references to historic environment sensitivities that must factor-in to site masterplanning and design. The possibility of additional site-specific policy for **Site 315** (Brinklow) and **Site 316** (Long Lawford) might be considered.

9.2.39. In **conclusion**, as per the conclusion reached in Section 6.2, at this stage it is appropriate to predict **'moderate or uncertain' negative effect**. A key consideration is that whilst Historic Impact Assessments have been prepared these will need to be scrutinised through the current consultation.

Homes

9.2.40. The appraisal in Section 6.2 very strongly supports the proposed housing growth strategy but also suggests that a case can be made for supporting higher growth. The key point to note is a proposal to set the housing requirement at **Local Housing Need (LHN)** and to identify a supply significantly above the requirement (looking over the plan period as a whole), i.e. a 'supply buffer' as a contingency for unforeseen delivery issues. It should also be the case that there is no need to consider a stepped requirement, i.e. one whereby providing for LHN in full is delayed until later in the plan period.

9.2.41. Finally, with regards to providing for Gypsy and Traveller accommodation needs, this matter is discussed in detail across Section 5 and 6, and the conclusion is that whilst the Draft Local Plan is a major step forward there is a need for ongoing work aimed at providing for needs in full.

9.2.42. There are then a range of important area-wide DM policies, most notably Policy H1 (Affordable housing) which requires: *"Developments that result in ten or more new homes (including conversions and subdivisions) shall provide at least the following proportion of new homes as affordable homes: i. Within the Rugby urban area 20%; ii. Elsewhere in the borough 30%. The tenure mix of affordable homes should be as follows: i. Social rent 82%; ii. Affordable home ownership 18%."* As discussed above, there is a need for further work on Whole Plan Viability, but compromising on affordable housing is unlikely.

9.2.43. In **conclusion**, a **significant positive effect** is predicted. However, there is a need for further work in respect of providing for Gypsy and Traveller accommodation needs.

Landscape and townscape

9.2.44. Both of the growth scenarios appraisal sections above **flag a concern** with the emerging proposed strategy and find that there is a 'landscape' case to be made for supporting an alternative approach. However, concerns are not to be over-stated given that most of the sensitive sites in question have a worst "medium/low" landscape sensitivity, with only one site having "medium" sensitivity.

9.2.45. With regards to sites that are not a focus of appraisal in Section 6 on account of being held constant across the growth scenarios appraised, attention focuses on:

- **Site 40** southeast of Rugby (125 homes) – the Oxford Canal is adjacent although the proposal is for the site to be masterplanned in collaboration with the Rivers and Canals Trust. A field to the west has not been promoted as available but might be considered to ensure comprehensive growth.
- **Site 307** at Clifton-upon-Dunsmore (10 homes) – a small site but located to the west of the village, where the landscape falls away quite steeply towards the Avon Valley. As a small site there are limited concerns, and site specific policy is set to require *“solely rear gardens along the western boundary of the site would not be supported to enable a more attractive settlement edge”*.
- **Site 84** at Wolvey (60 homes) – there is a very strong proposal to develop only a small proportion of this site, with the bulk of the site delivered as an area of riverside parkland and a play area. However the housing area would deliver a 'phase 2' of a scheme currently under construction and does not relate well to the settlement edge / would not be well-contained in landscape.

9.2.46. With regards to site specific policy, in addition to points already discussed, policy of note includes:

- Site 14 north of Ansty Park (employment) – “Buildings to be set within a managed, high-quality landscaped environment consistent with Ansty Park.”
- Site 17 (South West Rugby Reserve Site) – *“Creation of a wooded circa 8.6ha publicly accessible country park alongside Cawston Spinnery to include footpaths linking to existing routes and providing east-west connectivity along the northern site boundary.”*

9.2.47. In **conclusion**, at this stage it is appropriate to flag a **'moderate or uncertain' negative effect**, but this is potentially somewhat marginal. It should be possible to conclude a neutral effect following further work to consider site specific policy and feasibly also adjustments to site boundaries.

Resources

9.2.48. The conclusion reached across Sections 6.2 and 6.3 is that there will be a loss of BMV agricultural land that is potentially significant, but it is not possible to identify an alternative preferable strategy.

9.2.49. With regards to sites that are not a focus of appraisal in Section 6 (on account of being constants), a key site of note is **Site 129** at Clifton-upon-Dunsmore (60 homes), which is shown by the nationally available low resolution/accuracy dataset to comprise grade 2 quality (BMV) agricultural land.

9.2.50. In conclusion, as per the conclusion reached in Section 6, there is a need to predict a 'moderate or uncertain' negative effect. The vies of Natural England on 'significance' would be welcomed.

Transport

9.2.51. The appraisal in **Section 6.2 flags a concern** with the proposed housing growth strategy, but it is not possible to identify an alternative strategy that is preferable in terms of transport objectives. The proposed employment land strategy is then broadly supported through the appraisal in Section 6.3.

9.2.52. With regards to sites that are not a focus of appraisal in Section 6 on account of being held constant across the growth scenarios appraised, attention focuses on:

- Dunchurch – a good settlement score and growth can support public transport enhancements, but clear traffic issues.

- Stretton-upon-Dunsmore – a village not directly linked to an A-road and with a ‘middling’ settlement score; again, growth can support public transport enhancements.
- Newton – a rural village, but with a good settlement score, and new community infrastructure is set to be delivered nearby.
- Ansty Park – well linked to the strategic road network, but distant from a train station.
- South West Rugby Reserve Site – will help to deliver planned strategic road / transport upgrades.
- Binley Woods – the low growth strategy can be questioned given a high settlement score.

9.2.53. Transport objectives are then a key focus of area-wide and site specific DM policy, and it is difficult to suggest any significant tensions with wider objectives. Site specific policy has already been discussed above as commendable in that it is well-targeted. It will be crucially important to take account of comments received from the County Council through the consultation, including in terms of directing scarce funds (developer contributions) to select transport upgrades, e.g. active travel links and road / junction upgrades aimed at supporting public transport (including potentially by minimising traffic).

9.2.54. In **conclusion**, there is a need to predict a **‘moderate or uncertain’ negative effect** at this stage (in line with the conclusion reached in Section 6.2) but this is potentially marginal, and at the next stage it should be possible to conclude a neutral effect after having accounted for consultation responses and also the findings of forthcoming Strategic Transport Assessment.

Water

9.2.55. The appraisals in Section 6 do not flag any concerns and it is difficult to elaborate further here, other than by stating support for Policy CL3 (Water supply, quality and efficiency), which requires:

“A. New development shall minimise the need for new infrastructure by being located where there is a guaranteed and adequate water supply. B. New development must not either directly or indirectly through overloading wastewater treatment works result in adverse impacts on the quality of waterbodies, groundwater or surface water, nor prevent waterbodies from achieving a good ecological and chemical status in the future. Any required upgrades to wastewater infrastructure will need to be completed before the development is occupied. C. New dwellings shall demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling, as calculated in accordance with the methodology in the water efficiency calculator, does not exceed 110 litres per person per day in line with regulation 36(2)(b) of the Building Regulations 2010 (as amended). D. New non-residential development that is major development shall achieve full credits for category Wat 01 of BREEAM, unless demonstrated impracticable.”

9.2.56. In conclusion, a **neutral effect** is predicted.

Overall conclusion

9.2.57. The appraisal predicts: **significant positive effects** under two headings (economy/employment and homes); **moderate or uncertain positive effects** under two headings (climate change mitigation and communities/health/wellbeing) and **moderate or uncertain negative effects** under two headings (historic environment and landscape). Neutral effects are predicted under the remaining headings (which is not to suggest that there are not certain tensions with sustainability objectives to explore further). The appraisal does not predict any significant negative effects.

Part 3: Next steps

10. Plan finalisation

- 10.1.1. Subsequent to the current consultation consideration will be given consultation responses received and further evidence-gathering / analysis an SA work will be undertaken as necessary, before the Council then prepares the Proposed Submission Local Plan for publication under Regulation 19 of the Local Planning Regulations. The formally required SA Report will be prepared for publication alongside, essentially tasked with presenting an appraisal of “the plan and reasonable alternatives”.
- 10.1.2. Once the period for representations on the Local Plan / SA Report has finished the intention is to submit the plan for examination in public alongside a summary of the main issues raised through the Regulation 19 publication period. The Council will also submit the SA Report.
- 10.1.3. At examination one or more Government-appointed Inspector(s) will consider representations before identifying modifications necessary for soundness. Modifications will then be prepared (alongside SA if necessary) and subjected to consultation (alongside an SA Report Addendum if necessary).
- 10.1.4. Once found to be ‘sound’ the Local Plan will be adopted. At the time of adoption a ‘Statement’ must be published that sets out (amongst other things) “the measures decided concerning monitoring”.

11. Monitoring

- 11.1.1. Within the SA Report the requirement is to present “measures envisaged concerning monitoring”.
- 11.1.2. On the basis of the appraisal it could be suggested that historic environment and landscape impacts might be a focus of monitoring efforts. However, neither topic lends itself easily to monitoring. Another key consideration locally is planning for employment land needs, and, in this regard, there may be scope for a concerted effort to monitor the nature of schemes coming forward with a view to robust information that can then feed in effectively to future work on needs assessment and strategy. Finally, there will be a need for close monitoring of the extent to which Policy CL1 (Net zero buildings) is fully implemented.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation (N.B. this current report is an Interim SA Report, as opposed to the SA Report, but nonetheless aims to present the information required of the SA Report). Table C then presents a discussion of more precisely how the information in this Interim SA Report reflects the requirements for the SA Report.

Table A: Questions answered by this Interim SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
		What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the SA scope?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1		What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2		What are the SA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3		What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to the report structure

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3.
c) The environmental characteristics of areas likely to be significantly affected;	The SA scope – in terms of key sustainability issues and objectives, including accounting for evolution of the baseline without the plan – is then discussed within the appraisal sections as appropriate, i.e. in light of the options and proposals that are a focus of the appraisal.
d) ... environmental problems which are relevant... areas of a particular environmental importance...;	The SA scope – in terms of key sustainability issues and objectives, including accounting for evolution of the baseline without the plan – is then discussed within the appraisal sections as appropriate, i.e. in light of the options and proposals that are a focus of the appraisal.
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) fed into the 'SA framework', which is presented within Section 3. Also, information on the SA scope is presented as part of appraisal work in Sections 6 and 9. With regards to explaining "how... considerations have been taken into account", Section 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the various effect characteristics.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan...	Section 9 presents recommendations but perhaps more importantly flags 'tensions' that can be a focus of further work ahead of plan finalisation.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Sections 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives / scenarios appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan...	This Interim SA Report is published alongside the Draft Local Plan in order to inform the consultation and then subsequent plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5 [and] the opinions expressed pursuant to Article 6... shall be taken into account during the preparation of the plan... and before its adoption or submission to the legislative procedure.	This Interim SA Report will be taken into account when finalising the plan for publication (see Section 10).

