

**From:** [Alison Kennedy](#)  
**To:** [Hayley Smith](#)  
**Cc:** [Abigail Murphy](#)  
**Subject:** RE: South West Rugby Design Code  
**Date:** 27 May 2025 12:31:01  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Hello

And a few more comments on the Movement section:

- p28 – MO.12 change to ‘walking, wheeling and cycling’
- p28 – MO.18 please change cycle lanes to ‘cycle tracks’
- p32 – if you want a more local example of a central median on a main street then you could use [REDACTED] <https://maps.app.goo.gl/DvbPR4QSRk2Z6Gh97> or [REDACTED] <https://maps.app.goo.gl/kZbxuJdKYHHwwwmHBA>
- p33 – if you want a local example of using urban form and public space to manage traffic speeds, you could use [REDACTED] <https://maps.app.goo.gl/BeuXmVsvvxK2iejp8> although it also shows what happens if you don’t control parking... or there are the pinch points on a straight street on [REDACTED] <https://maps.app.goo.gl/4SV8M4jTkhQfzYZC7> or on-street parking on straight section of Longstork Road, Rugby <https://maps.app.goo.gl/o2njZ6TSBw6RemvD8>
- p34 – not sure that MO.37 makes sense – it talks about the primary street network but includes non-primary roads? Should it say, ‘the street network...’?
- p34 - MO.38 It’s not clear what ‘these streets’ refers to
- p37 – MO.42 could be altered to be clearer – maybe something along the lines of ‘long-stay cycle parking, including at the primary community mobility hub, must be covered and accessible’?
- p37 should also reference that cycle parking standards are set out in the Rugby District Council Local Plan

Alison

**Alison Kennedy**

Principal Transport Planner

Transport Strategy and Road Safety Group

Warwickshire County Council

Tel 01926 413950

[REDACTED]

[REDACTED]

X @WCCSafe\_Active

Facebook @WCCSafeActiveTravel

My usual working hours are 9am to 5pm, Monday to Thursday

---

**From:** Alison Kennedy

**Sent:** 27 May 2025 12:03

**To:** Hayley Smith

**Cc:** Abigail Murphy



**Subject:** RE: South West Rugby Design Code

Hello

Thanks – I'll take a look now at that section. My notes on the public space sections are:

- p55 secondary street PS.05 – could you change the text to something like, 'cycle tracks (segregated) must be provided as per LTN1/20. The desirable minimum width is 3.0m'
- 0.5m is the desirable minimum horizontal separation between cycle track and carriageway (for speed limits of 30mph or lower) but as most images show a verge, SUD or other separation, this is not necessary in the drawings – except where the cycle track is adjacent to on-street parking, where the buffer helps prevent car doors from being opened into the path of cyclists
- p55 image – consider some on-street cycle parking
- p55 image - footways on building side of road are confusing
- p55 image – bus stop – if a mini zebra could be placed at the back of the bus stop across the cycle track, this would help to indicate priority for pedestrians/ bus passengers – see attached photo from Coundon Cycleway in Coventry  
<https://maps.app.goo.gl/tyhx3hBcSSGw4o1b6>
- p56 suburban secondary street – PS.06 – could you change the text to something like, 'cycle tracks (segregated) must be provided as per LTN1/20. The desirable minimum width is 3.0m'
- p56 image – doesn't need 0.5 separation strip/ buffer
- p56 image – please add a gap opposite the side road so that cyclists can transition from the side road (on-carriageway) to the cycle track (off-carriageway) as done in Coundon Cycleway Coventry (photo attached)  
<https://maps.app.goo.gl/wNNjfupS488FpASb9>
- p57 Example A doesn't need 0.5m buffer except next to parking, Example D doesn't need 0.5m buffer
- p59 Tertiary Street change text to 'safe cycling must be accommodated in the carriageway unless the street includes schools or community facilities, or provides a short link between cycle tracks, in which case cycle tracks should be provided'
- p63 PS.44 change to must provide dedicated spaces for walking, wheeling and cycling
- p67 Rights of Way team should also be consulted on Bridleways. WCC Active Travel team should be consulted on recreational routes and greenway links

Alison

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---

**From:** Hayley Smith [REDACTED]



**Sent:** 27 May 2025 11:33

**To:** Alison Kennedy [REDACTED]

**Cc:** Abigail Murphy [REDACTED]

**Subject:** South West Rugby Design Code

Hi Alison

Thanks again for talking through your thoughts on the consultation draft just now. As discussed the link to the movement chapter is below. Page 37 discusses cycle parking. Please let me know if you have any feedback on this section (or anything else).

[e6cee1e3-030c-6431-7650-55e527d7cb31](#)

I have made notes during our conversation, but if you are able to share any notes you have made, that would be helpful.

Regards,

Hayley Smith



Principal Planning Officer (Development Strategy)  
Development Strategy Team  
Growth and Investment  
Rugby Borough Council  
Tel: 01788 533741  
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**Mail:**



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**From:** [Alison Kennedy](#)  
**To:** [Hayley Smith](#)  
**Cc:** [Abigail Murphy](#)  
**Subject:** RE: South West Rugby Design Code  
**Date:** 27 May 2025 12:05:16  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[IMG\\_9228.JPG](#)  
[IMG\\_9269.JPG](#)

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Alison

**Alison Kennedy**

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Transport Strategy and Road Safety Group



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**From:** Hayley Smith

**Sent:** 27 May 2025 11:33

**To:** Alison Kennedy

**Cc:** Abigail Murphy

**Subject:** South West Rugby Design Code

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[e6cee1e3-030c-6431-7650-55e527d7cb31](https://www.warwickshire.gov.uk/e6cee1e3-030c-6431-7650-55e527d7cb31)

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Regards,

Hayley Smith



Principal Planning Officer (Development Strategy)  
Development Strategy Team  
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M: 07827818188  
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**From:** [Planning-Advice](#)  
**To:** [Local Plan](#)  
**Subject:** RE: Consultation - South West Rugby Design Code SPD  
**Date:** 10 February 2025 13:58:20  
**Attachments:** [image004.jpg](#)  
[image006.png](#)  
[image008.png](#)  
[image010.png](#)  
[image012.png](#)  
[image013.png](#)  
[image014.png](#)  
[image001.png](#)

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Good Afternoon,

Since Thursday 1<sup>st</sup> June 2023 ATE has been a statutory consultee on all planning applications for new developments that meet or exceed one of more of its application thresholds. This statutory consultee role does not extend to plan-making consultations, therefore ATE does not respond to any consultations that it does receive.

ATE has however recently launched an independent one-year review to scope out opportunities for ATE's involvement in local plans in the future. Should there be any changes to the planning system due to this project planning authorities will be advised.

Should you have any queries on the above then please get in touch with the team at:

[REDACTED].

Thank you,



Development Management Team, Active Travel England,  
2nd Floor, West Offices, Station Rise, York, YO1 6GA  
Follow us on X [@activetraveleng](#), Instagram [@activetravelengland](#) and on [LinkedIn](#)

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**From:** Local Plan

**Sent:** 10 February 2025 13:30

**To:** Local Plan

**Subject:** Consultation - South West Rugby Design Code SPD

Dear Sir/Madam

**The Town and Country Planning (Local Planning) (England) Regulations 2012  
South West Rugby Design Code Supplementary Planning Document public  
consultation**

Rugby Borough Council is consulting on a draft South West Rugby Design Code Supplementary Planning Document from 10 February 2025 **until 5pm on 10 March 2025**.

The supplementary planning document has been produced to provide concise and often illustrated design requirements for the physical development of South West Rugby. The document can be accessed on the council's website [South West Rugby Design Code consultation - Rugby Borough Council](#) and at the following locations:

- [REDACTED]
- [REDACTED]



• [REDACTED]

Consultation responses can be sent via

1) email to [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) with 'South West Rugby Design Code SPD Consultation' in the subject line, or

2) [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Please include the relevant section of the document, page number and (where applicable) a principle number with any comments, so that we can fully understand and consider them. Please note, if you submit a response by email you do not need to submit a paper copy as well. Consultation responses will be made available for public inspection.

You have received this email because your contact details are held on our consultation database. If you wish to have your details removed from this database, please contact us.

To view the council's development strategy privacy notice please visit:

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

Should you require any further information, please contact the Development Strategy team.

Regards,

Hayley Smith



Principal Planning Officer (Development Strategy)  
Development Strategy Team  
Growth and Investment  
Rugby Borough Council  
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M: 07827818188  
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Catesby Estates' Consultation Response Table to the South West Rugby Design Code SPD (February 2025)

| Comment ID                     | Relevant Page Number | Relevant Code Number / Graphic | Catesby Estates Response  | Recommendation  |
|--------------------------------|----------------------|--------------------------------|---|---|
| <b>Chapter 1: Introduction</b> |                      |                                |   |   |
| 1.1                            | Page 6               | General                        | <p>We recommend providing additional context to the definitions of 'Must', 'Should', and 'Could'. For instance, "Must" is typically seen as an absolute term that signifies certainty. However, we believe a certain level of flexibility should be allowed to foster innovation and accommodate the nuances across different allocations. In some instances, it may be unfeasible to fully meet the 'Must' requirements, so reclassifying some of these requirements, as detailed below, would be more appropriate.</p> <p>It is suggested that the following wording (or similar is added) in this regard:</p> <p><i>If development proposals do not comply with design fixes, it is the responsibility of the team proposing the scheme (the developer and their design team) to explain why any mandatory ('Must') or recommended elements ('Should'/'Could') are not met, and demonstrate that the proposals do not conflict with the overall aim of the South West Rugby Design Code.</i></p> <p><i>Departures from the Design Code will only be acceptable when a rationale for not complying with mandatory design fixes or recommended design practices can be clearly demonstrated as a positive intervention that has placemaking benefits, or responds appropriately to changing legislation, circumstances and technological advancement. It may also be necessary to depart from some aspects of the Design Code in light of unforeseen site conditions or ground investigations. Any such noncompliance will be subject to agreement with RBC.</i></p> <p>It is suggested that specific caveats be incorporated into the definition of 'Must', such as "Subject to the inclusion of appropriate and proportionate mitigation."</p> | Amend Definitions and include recommended additional wording. |



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| Comment ID                 | Relevant Page Number | Relevant Code Number / Graphic                              | Catesby Estates Response  | Recommendation                 |
|----------------------------|----------------------|---|---|--------------------------------|
| <b>Chapter 2: Analysis</b> |                      |   |   |                                |
| 2.1                        | Page 10              | Land Ownership Plan   | Change 'Urban + Civic' to 'Catesby Estates'.  | Amend text.                    |
| 2.2                        | Page 12              | General   | <p>It is recommended that the graphic distinguish between 'Woodland' and 'Ancient Woodland'. Additionally, the plan does not accurately show the extent of the TPOs and therefore the plan needs to be revised accordingly. It may be that an additional plan is required to successfully differentiate between what is 'Woodland', 'Ancient Woodland', and the TPOs.</p> <p>For completeness add "Fox Covert" and "Boat House Spinney" to the vision text, so to read "Retained landscape features including Cawston Spinney, Fox Covert, Boat House Spinney and Cock Robin Wood".</p> | Amend plan as recommendations. |
| <b>Chapter 3: Vision</b>   |                      |   |   |                                |
| 3.1                        | Page 21              | Text in italics, 2 <sup>nd</sup> para, 2 <sup>nd</sup> line | For completeness add "and Fox Covert and Boat House Spinney"  | Amend text.                    |
| 3.2                        | Page 22              | Framework Masterplan: Graphic                               | <p>We recommend that the Framework Masterplan is updated to align with Catesby Estates' proposals for their site, which show a more considered approach to green infrastructure provision.</p> <p>Cawston Lane needs to be shown as a main route not a local road.</p> <p>The existing rights of way should be shown as they are an important structural element in the design proposals.</p> <p>Point 5 – for completeness add "and Fox Covert and Boat House Spinney"</p>   | Amend graphic.                 |



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| Comment ID  | Relevant Page Number | Relevant Code Number / Graphic | Catesby Estates Response   | Recommendation   |
|---|----------------------|--------------------------------|--|--|
| <b>Chapter 4: Code - Section 1 - Context and Coordination</b> |                      |                                |  |  |
| 4.1   | Page 24              | CO.01 - CO.03                  | <p>CO.01 and CO.02 are in conflict with each other. It is not feasible to display both the existing context and neighboring schemes where information is available. We support the principle of considering the neighboring context in applications to ensure an appropriate design response. We propose that CO.01 be removed and CO.02 be retained. While the existing context is valuable for site analysis, the primary aim of this Code is to ensure coordination across the allocation, making the existing context less relevant.</p> <p>We recommend amending Code CO.03 to provide general guidance on the approach, rather than stating it as a mandatory requirement.</p> <p>We recommend this is accompanied by further clarification such as:</p> <p><i>"Key strategies and principles are anticipated to be coordinated as a part of outline applications with further detail on built form, materiality and landscaping coordinated as a part of Reserved Matter Applications."</i></p> | Amend Design Codes CO.01 & CO.02 & CO.03   |
| <b>Chapter 4: Code - Section 2 - Movement</b>                 |                      |                                |  |  |
| 4.2   | Page 27              | Street Network: Case Study     | <p>A more local or regional example should be used rather than Poundbury. Consider referencing Houlton, Rugby.</p> <p>Related to this point, the photographic examples used are not local to the South West Rugby. Could more local or regional examples be used as well?</p>  | Amend case study and consider using some more local or regional photographic examples. |
| 4.3   | Page 33              | MO.35                          | Can RBC confirm that WCC is aligned with points 1-7 to ensure the code's deliverability?   | Clarification required.  |



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|---|----------------------|--|--|--|
| 4.4   | Page 33              | Street Network – Tertiary Street Networks: Graphic | Suggest Diagram is removed. This diagram appears overly theoretical and lacks a sense of scale, which is concerning given the wider site's numerous existing public rights of way and site-specific landscape features. We are worried about the potential for misunderstandings this could cause.   | Remove diagram.  |
| 4.5   | Page 34              | Movement: Street Network                           | The naming of the street typologies are inconsistent with those on the Framework Masterplan. The Framework Plan refers to the street running through Catesby Estate's site as a 'local access road', whilst the Street Network plan on page 34 refers to it as a 'tertiary' street. The naming of these street should be consistent. The B4642 Coventry Road should be reclassified as an existing Primary Road.         | Ensure street typologies references are consistent.                    |
| 4.6   | Page 34              | MO.38  | The 'main street network' is undefined. Further clarity is required to define this.  | Provide further clarity.   |
| 4.7   | Page 35              | Active Travel Framework: Text                      | There is no corresponding code reference to ensure the active travel framework is secured. Point 5 - There is no explanation or cross-reference as to what 'Existing footpath upgrade: Conversion to active-only route/street' means.  | Add explanatory text regarding conversion to active-only route/street. |
| <b>Chapter 4: Code - Section 3 - Nature</b> |                      |  |  |  |
| 4.8   | Page 42              | NA.02  | While we generally support the aspiration, we are concerned by the wording and level of prescription implied by "All landscape features must be retained...". This is overly restrictive. Additional wording should be added to recognise that some hedgerow removal may be required to facilitate access to and between development parcels, and that where this is necessary compensatory planting should be provided. | Amend NA.02.   |
| 4.9   | Page 42              | Landscape Character Plan                           | Key text font size is too small.<br><br>Parcel 20i should be sub-diverted further, as not all of it is woodland.   | Suggest woodland have its own parcel category.                         |



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| Comment ID | Relevant Page Number | Relevant Code Number / Graphic | Catesby Estates Response  | Recommendation  |
|------------|----------------------|--------------------------------|---|---|
| 4.10       | Page 43              | NA.12 – NA.16                  | <p>While we generally support the aspiration, we are concerned about the lack of clarity regarding the reference to landscape features and the blanket use of 'must' in relation to buffers. It is unclear which specific landscape features are being referred to.</p> <p>We believe that buffers should be addressed in a single section of the document to ensure clarity and should be primarily focussed on buffers to the Ancient Woodland.</p>   | Update Code with further information on landscape features and buffers. |
| 4.11       | Page 43              | NA.19                          | <p>While we generally support the aspiration to align with drainage practices, this code only references 'micro-SUDS' and provides just a few very specific examples of SuDS. A key concern is that, due to the ground conditions, these forms of SuDS may not always be feasible.</p> <p>As a result, the reference to "must" should be changed to "should," and we recommend that this code be revised to address SuDS and drainage in broader terms. Where specific examples are mentioned, it should be made clear that these are just a few examples of a much wider range of possibilities.</p> | Remove Code or amend wording from "must" to "should".                   |
| 4.12       | Page 44              | NA.23 & NA.24                  | <p>NA.23 and NA.24 both specify that woodlands must have a 15m buffer and ancient woodland a 20m buffer. However, paragraph 9.5 of the SW Rugby SPD states that Natural England's standing advice calls for a 15m buffer for ancient woodland. As a result, the design code contradicts the adopted SW Rugby SPD, and the code needs to be revised for consistency.</p>   | Remove or Amend Code  |



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| Comment ID  | Relevant Page Number | Relevant Code Number / Graphic                               | Catesby Estates Response  | Recommendation                                       |
|---|----------------------|--|---|--|
| 4.13  | Pages 43 and 44      | Existing landscape features and Buffers and Boundaries plans | The plans do not accurately show the extent of the TPOs and therefore need to be revised accordingly. It may be that an additional plan is required to successfully differentiate between what is 'Woodland', 'Ancient Woodland', and the TPOs. It is recommended that the graphic distinguish between 'Woodland' and 'Ancient Woodland' and the TPO. |  |
| <b>Chapter 4: Code - Section 4 – Public Space</b> |                      |  |   |  |
| 4.14  | Page 58              | PS.18  | We recommend reviewing and revising this to "should," as this may require further discussion with highways. Additionally, it implies that pedestrian and cycle permeability must be achieved through frequent road junctions, rather than balancing this against the role of public rights of way and recreationan routes as alternatives.            | Remove Code or amend wording from "must" to "should" |
| 4.15  | Page 58              | PS.20  | This repeats guidance from the Warwickshire Design Guide and adopts a car-focused approach. The photographic examples are not particuarly representative of the tertiary street typology and should be reviewed and subsituted with more relevant examples.   | Amend Code   |
| 4.16  | Page 59              | PS.24  | The code should be revised from "must" to "should" to allow for flexibility and variation, considering the different site conditions, constraints, and potential future discussions with highways. This change should also apply to the bullet points within the code that currently use "must."  | Amend Code and wording from "could" to "should"      |



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|------------|----------------------|--|---|---|
| 4.17       | Page 61              | PS.25  | <p>The code should be revised from "must" to "should" to allow for flexibility and variation, considering the different site conditions, constraints, and potential future discussions with highways. This change should also apply to the bullet points within the code that currently use "must."</p> <p>The first bullet point refers to a minimum carriageway width of 5.0m. However, the Warwickshire Design Guide requires a minimum carriageway width of 5.5m, also noting that swept path tracking may require localised widening. Has the proposed minimum carriageway width of 5.0m been agreed with Warwickshire County Council.</p> | <p>Amend Code and wording from "could" to "should".</p> <p>Review carriageway widths against the Warwickshire Design Guide.</p> |
| 4.18       | Page 62              | PS.27  | This code should be revised to say that hedgerows should be preserved in accordance with the recommendations of the submitted tree survey and arboricultural implications assessment.   | Amend to refer to submitted tree survey   |
| 4.19       | Page 62              | PS.33  | Consider making reference to "fastigate" trees rather than small and medium tree species. This will provide clarity that trees with upright branches that have a colunar shape are more appropriate as street trees.  | Amend to refer to the use of fastigate street tree species.   |
| 4.20       | Page 62              | PS.34  | We suggest this code is refined. In reality the use of root barrier systems is only required in highway open spaces such as verges. The current wording of the code could be misintepreted as referring to all open spaces that abut a highway, where in reality new tree planting may be a signicant distance away from the highway and therefore not require a root barrier system.   | Amend code.   |
| 4.21       | Page 62              | Tertiary Streets – Landscaping<br>General Principles:<br>Graphic | We've observed that the diagrams provided include very few on-plot parking spaces for tertiary streets. Without labels, it's difficult to grasp the key principles that RBC intends to convey. We recommend including at least one example with more on-plot parking and adding labels for clarity. Design example B does appear to show any front garden space or at the very least a threshold space within the curtilage of the house that will be required to allow for the overhang of eaves and for windows to be opened onto.  | Amend code.   |



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|---|----------------------|--------------------------------|---|---|
| 4.22  | Page 63              | PS.35 – PS.38                  | We recommend changing these codes from "must" to "should" so they can be thoroughly reviewed as part of future RMAs.<br><br>PS.36 – The Warwickshire Design Guide sets out that private drives can reduce in width to a minimum of 4.5m.  | Amend wording from "must" to "should".<br>Amend minimum width of private driveways. |
| 4.23  | Page 64              | PS.39 – PS.43                  | The provision of car-free streets is laudable. However, there is no indication of their anticated provision or where they are to be located. Is the provision of car-free streets discretionary? More detail is required to understand whether this Code is appropriate and deliverable.  | Provide further clarification on the provision of car-free streets.                 |
| 4.24  | Page 63              | PS.44 & PS.45                  | There is no indication of where these routes would be located. The wording of these codes, which suggests dedicated cycle provision on all routes, could affect their feasibility. A blanket mandatory requirement for dedicated spaces for cyclists is not practical.<br><br>Active-only routes should be implemented to ensure strong connectivity across the allocation and encourage walking and cycling. | Amend code.   |
| 4.25  | Page 64              | PS.47                          | We support the retention of hedgerows. However, the wording of this code needs to be revised to recognise that the loss of some stretches of hedgerow will be required to facilitate access from existing roads and between development parcels. The code should add that compensatory planting is to be provided where there is such loss.   | Amend code.   |
| 4.26  | Page 64              | PS.49                          | This code should be revised to say that hedgerows should be preserved in accordance with the recommendations of the submitted tree survey and arboricultural implications assessment.   | Amend to refer to submitted tree survey.  |
| <b>Chapter 4: Code - Section 5 – Built Form</b> |                      |                                |   |   |
| 4.27  | Page 69              | Introductory text              | The suggestion of overriding information may lead to confusion. Could this be rephrased to emphasise that each section adds an extra layer of information or detail, complementing and offering additional 'site-specific' guidance?  | Amend text.   |



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|------------|----------------------|--------------------------------|---|----------------|
| 4.28       | Page 70              | BF.05                          | While we appreciate that the wording allows for some flexibility, it is vitally important to emphasise that this may not be feasible in all cases, as orientation and built form must also consider a range of factors (e.g. BF 12-14 on the following page). We suggest moving this to the next page, where it can be read alongside BF.12 – BF.14, to provide greater clarity on the balance of factors that need to be considered.   | Remove code    |
| 4.29       | Page 71              | BF.17                          | We agree with the intent of this code. However, the wording of this code does not quite make sense and should be reviewed and refined to be more clear.   | Amend text.    |
| 4.30       | Page 73              | B.25                           | We recommend strengthening this code to a "must" to ensure coordination across boundaries.  | Amend code.    |
| 4.31       | Page 73              | Building Heights: Graphics     | <p>We echo the concerns of Homes England here. We are concerned about the proposed taller building heights on the safeguarded land to the west of our site. This approach will not facilitate a cohesive transition in scale and massing between residential and employment areas. The graphic also suggests that development could be placed close to the boundary of the safeguarded land without adequate consideration of its visual impact on residential areas, the structural landscape planting, existing public rights of way, or the protection and enhancement of existing hedgerows and associated habitats.</p> <p>There should be a clear principle of lower building heights next to new residential areas, with appropriate setbacks in the safeguarded land to mitigate potential environmental and visual impacts from the employment land.</p> | Amend graphic. |



Catesby Estates' Consultation Response Table to the South West Rugby Design Code SPD (February 2025).

| Comment ID | Relevant Page Number | Relevant Code Number / Graphic | Catesby Estates Response  | Recommendation |
|------------|----------------------|--------------------------------|---|----------------|
| 4.32       | Page 74              | Residential area types: Plan   | The shade of yellow used for the 'suburban residential' and 'green fringe' character areas are very similar. These should be amended to provide a clearer distinction and avoid confusion.  | Amend graphic. |
| 4.33       | Page 77              | BF.32                          | <p><b>Dwelling typologies:</b> We would request that the 'detached' typologies is added to the list. Detached houses (i.e. not linked) is appropriate to the required character of the area.</p> <p><b>Building line:</b> We request that the quantification be removed from the table, as we have concerns about the specificity of these numbers and how they may be interpreted. If a number is necessary, we believe it should be expanded upon to account for variations in road alignment and different edge conditions within the character area. For example, it is appropriate to have deeper front gardens alongside the woodland buffers to complement their landscape character, whilst shallower front gardens are more appropriate along the character areas main streets and internal public spaces. The stated set back distance of 1 – 3m does not allow for sufficient variety or nuance.</p> <p>We suggest the following wording:</p> <p><i>"Limited setbacks, with proposed setbacks used to respond to existing landscape areas and provide variety or nuance in alignment with the Placemaking Aims."</i></p> <p><b>Boundary treatments:</b> Make clear this applies to front boundary treatments to avoid confusion with other parts of the Design Code.</p> | Amend code.    |



Catesby Estates' Consultation Response Table to the South West Rugby Design Code SPD (February 2025).

| Comment ID | Relevant Page Number | Relevant Code Number / Graphic | Catesby Estates Response   | Recommendation |
|------------|----------------------|--------------------------------|--|----------------|
| 4.34       | Page 84              | Explanatory text               | If the Safeguarded Land is developed for employment, a landscape edge should be incorporated on the employment site (safeguarded land) to create a positive interface with the adjacent housing and mitigate all environmental impacts on the employment land. This mitigation may require more than just new landscaping, and the potential use of acoustic bunds and fencing needs to be acknowledged and explored further in the Design Code, with appropriate coding required to ensure an appropriate interface is created between the potential employment uses and the new homes. | Amend code.    |
| 4.35       | Page 88              | Explanatory text               | The text sets a mandatory requirement for buffers to be widened regularly to allow for extra 'breathing space'. Although this is laudable, we respectfully refer back to the adopted guidance in the SW Rugby SPD, which state that Natural England's standing advice calls for a 15m buffer for ancient woodland. As a result, the design code contradicts the adopted SW Rugby SPD. The requirement for increasing the width of the buffers should be stated as a 'could' requirement.   | Amend text.    |
| 4.36       | Page 89              | BF.71                          | We suggest that this code is amended to make it clear that need for the landscape buffer must be provided within the employment site, not the residential areas, otherwise the westernmost part of our site is rendered undevelopable.   | Amend text.    |
| 4.37       | Page 90              | BF.77                          | We suggest revising this from "must" to "should."<br>We agree with this as an aspiration and that it should be avoided; however, given the scale of the employment buildings, it may be unavoidable in some cases.   | Amend text.    |



Catesby Estates' Consultation Response Table to the South West Rugby Design Code SPD (February 2025).

| Comment ID   | Relevant Page Number | Relevant Code Number / Graphic                | Catesby Estates Response   | Recommendation |
|--|----------------------|---|--|----------------|
| 4.38   | Page 90              | Edge – Employment and Landscape<br>Edge: Text | <p>We echo the concerns of Homes Engalnd here. Greater protection is needed between the employment edge and our site. This should receive the same level of attention as Scenario 1, with graphic illustrations developed to further clarify the statement on the previous page:</p> <p>"At the interface between proposed dwellings and proposed employment buildings (safeguarded land scenario 2), proposed employment buildings will be expected to provide the design response"</p> <p>If the Safeguarded Land is developed for employment, a landscape edge must be included on the employment site (safeguarded land) to create a positive interface with the adjacent housing and mitigate all environmental impacts on the employment land.</p> | Amend text.    |
| 4.39   | Page 90              | BF.80   | Echoing Comment 4.32 above, it must be stated here that buffering must be included within the employment site.   | Amend text.    |
| 4.40   | Page 91              | BF.85   | We believe this would be more appropriate as a "must" rather than a "should," as selecting two from the list provides sufficient flexibility.  | Amend text.    |
| 4.41   | Page 93              | Self-build & Custom-Build Housing: Text       | Self and custom build housing are not the same. Their definition here needs revising.  | Amend text.    |
| <b>Chapter 4: Code - Section 6 – Homes &amp; Buildings</b> |                      |   |  |                |
| 4.42   | Page 96              | HB.02   | Add "garden space / private amenity space" to list of acceptable spaces.   | Amend text.    |
| 4.43   | Page 96              | HB.04   | Add reference to "maisonettes" as well.  | Amend text.    |
| <b>Chapter 4: Code - Section 7 – Identity</b>              |                      |   |  |                |
| 4.44   | Page 100             | ID.14   | <p>Amend to "should". It isn't possible to specify that unprescribed details must be followed. Amend wording to:</p> <p><i>"Unless site constraints make it impossible, all dwellings, especially ground floor apartments, must have defensible space or privacy strip."</i></p>   | Amend text.    |



**Catesby Estates' Consultation Response Table to the South West Rugby Design Code SPD (February 2025).**

| Comment ID   | Relevant Page Number | Relevant Code Number / Graphic | Catesby Estates Response   | Recommendation   |
|--|----------------------|--------------------------------|--|------------------|
| 4.45   | Page 99              | ID.17                          | This code is overly specific. It should be amended to be more general about how elevational treatments can be used to emphasise building entrances. Recessed entrances could be identified as one of several potential design solutions.   | Amend text.      |
| <b>Appendix 1: Route and Streets: Landscape Preservation and Application</b> |                      |                                |  |                  |
| 5.1  | N/A                  | Appendix 1: General            | <p>Echoing concerns raised by Homes England, whilst we understand the intent behind the Appendix, we believe it requires extensive review and coordination with the rest of the Code, along with clarification regarding its status. Typically, an appendix provides supplementary information and does not include 'musts' or 'shoulds.'</p> <p>In its current form, it could limit suitable development across the allocation due to the level of detail emerging. This may negatively affect the overall viability and delivery of the development throughout the allocation and add considerable complexity in terms of how compliance would be assessed over SW Rugby's long delivery period. Additionally, the information appears very generic and not specific to the site.</p> <p>We strongly urge RBC to remove this appendix from the Code.</p> | Remove appendix. |



**From:** [Rob Rasberry](#)  
**To:** [Local Plan](#)  
**Subject:** South West Rugby Design Code SPD Consultation  
**Date:** 10 March 2025 16:46:41  
**Attachments:** [Outlook-A white ci.png](#)  
[Catesby Estates Response to the South West Rugby Design Code.pdf](#)

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**FAO Ms. Abigail Murphy**

On behalf of my client Catesby Estates, please find attached Catesby Estates' response to the South West Rugby Design Code SPD (February 2025). This response has been prepared in relation to Catesby Estates' respective part of the allocation. However, many elements of the response are relevant to other parts of the allocation, and we would respectfully ask this is considered when reviewing the attached.

Catesby Estates is broadly supportive of Rugby Borough Council (RBC) producing a Design Code for the South West Rugby Allocation and are supportive of the aim to deliver a high quality and coordinated development. This document will be a valuable tool for RBC to build upon the design aspirations outlined in the adopted South West Rugby Masterplan Supplementary Planning Document (SPD) (December 2024) and ensure a coordinated design approach across multiple landowners, developers, and planning applications. As outlined in the National Model Design Code, Design Codes are essential as they provide a framework for creating healthy, safe, green, environmentally responsive, sustainable, and distinctive places with a consistent, high-quality standard of design.

Our response takes the form of a tabulated response containing specific commentary and suggested amendments to specific pages, plans and codes.

Catesby Estates has engaged with RBC regarding the SW Rugby Allocation Design Code and is eager to continue these discussions to support the successful delivery of the Sustainable Urban Extension. We hope the enclosed materials help RBC in refining the Design Code, and we look forward to further engagement.

Kind regards,

Rob Rasberry

**Rob Rasberry BA (Hons) MA MRTPI**  
**Director (Masterplanning and Urban Design)**

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**From:** [Claire Brosnan](#)  
**To:** [Local Plan](#)  
**Subject:** South West Rugby Design Code SPD Consultation  
**Date:** 10 February 2025 14:12:55

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Dear Council, Planning Office,

I am writing to formally object to the proposed development at South West Rugby on the following grounds:

### 1. Noise & Disturbance

The development will cause excessive noise during construction and once completed, impacting the quality of life for residents.

There are no clear mitigation measures for construction noise (e.g., restricted working hours or noise barriers).

The proposed use (e.g., multiple dwellings, commercial premises) could lead to increased long-term noise pollution, affecting nearby homes.

### 2. Strain on Local Infrastructure

The area is already facing pressure on schools, healthcare, and utilities.

The proposal does not outline how additional demand on doctors surgeries, schools, or drainage systems will be managed.

Local infrastructure is insufficient to accommodate an increase in population from this development.

Our road quality is already poor, i have damaged my car multiple times on pot holes and deteriorating surface from sheer volume of traffic over the years.

### 3. Environmental Impact

The development could harm local wildlife and green spaces. An Ecological Impact Assessment should be conducted.

Increased pollution from additional traffic and construction will negatively affect air quality and biodiversity.

The proposal lacks provisions for sustainable design (e.g., green roofs, renewable energy sources, or tree planting).



#### 4. Traffic & Parking Issues

The development will lead to increased traffic congestion, particularly at peak hours when it is already a nightmare to travel anywhere in Rugby.

Insufficient parking provision will result in overspill parking on surrounding roads, causing inconvenience to existing residents.

No clear measures have been proposed to improve road safety for pedestrians and cyclists.

Given these concerns, I urge the Local Planning Authority to reject the application. Rugby is already over populated, less safe, inefficient emergency services and lacking an A&E putting pressure in other counties. These houses have a massive wide spread effect on quality of life, wellbeing and house value of all Rugby residents.

I would appreciate confirmation that my objection has been received and considered.

■ regards Claire Brosnan





Homes  
England

The Housing and Regeneration Agency



10 March 2025

**FAO Ms. Abigail Murphy**

### **South West Rugby Design Code (February 2025) Consultation**

These representations have been prepared by Homes England on behalf of the consortium of developers and land promoters at South West Rugby in response to Rugby Borough Council's consultation on the South West Rugby Design Code SPD (February 2025).

The consortium comprising Homes England, Taylor Wimpey and Catesby Estates are working collaboratively to deliver a comprehensive development of the SW Rugby allocation and are broadly supportive of [REDACTED] producing a Design Code for the entirety of the South West Rugby Allocation.

The consortium members have submitted separate representations on the detail contained within the draft Design Code SPD in relation to their respective parts of the allocation.

The consultation notes that, as part of the development of the South West Rugby Design Code, the Council has held a series of events and workshops, with:

local residents;

pupils at [REDACTED];

parish councillors; and

ward councillors.





A separate report has been prepared outlining the engagement events that have been undertaken, and how the feedback has been understood and incorporated into the emerging document. This is set out in the Community Stakeholder Engagement Summary (December 2024).

Whilst the Community Stakeholder Engagement Summary notes that there has been regular engagement with other stakeholders, including land and developer interests, the Draft Design Code would have benefited from more engagement with the consortium who were willing to support the Council in the preparation of the document.

Whilst the Council presented some of the draft plans to the consortium at their monthly meeting in November 2024, which were very much “work in progress” at that stage, we understood that we would be invited to work alongside the Council in the refinement of the plans and the Code generally. This has unfortunately not happened.

Whilst we were aware of the Code going to Cabinet, there were no specific consultation dates set out in the Cabinet report. We found the consultation on RBC’s website by chance.

Notwithstanding the above, the consortium is broadly supportive of Rugby Borough Council (RBC) producing a Design Code for the entirety of the South West Rugby Allocation and are supportive of the aim to deliver a high quality and coordinated development.

This document will be a useful tool for the Council to expand on the design aspirations set out within the adopted South West Rugby Masterplan Supplementary Planning Document (SPD) (December 2024) and ensure a coordinated design response across a number of landowners, developers and planning applications. To this end, Homes England, Taylor Wimpey and Catesby Estates are working closely with one another to achieve this through design coordination and collaboration on our respective masterplans and infrastructure delivery.

However, it is essential that the Design Code SPD does not impede the delivery of the allocation nor create ambiguity or confusion and ultimately delays in the determination of planning applications. Importantly,

The Code must be consistent with the Local Plan and the recently adopted South West Rugby SPD (December 2024);

The plans included within the Code need to be accurate and reflect real site conditions, consented schemes and live planning applications;

The requirements of the Code must be consistent with national policy and standing guidance. Any departures need to be rational, properly evidenced and justified; and

The Code must accept the need for flexibility in its application to accommodate site conditions, development viability and practical delivery.

The Council will be aware that there are challenges to the viable delivery of South West Rugby. This was made clear in the consortium’s submissions on the South West Rugby SPD and Appendix K. The Council will also be aware that, following the initial consultation, the consortium was actively involved in the refinement of Appendix K working closely with the Council and Warwickshire County Council. This has provided for a more robust, viable, and deliverable Appendix K to support the SW Rugby allocation.





The consortium recommends that a similar approach is applied to the Design Code SPD and encourages the Council to fully engage with the consortium prior to taking forward the SPD to adoption to enable the Design Code to be refined in a form that supports rather than impedes the delivery of the allocation.

We are also aware that the MHCLG intends to update the National Design Guide and National Model Design Code in Spring this year.<sup>1</sup>

Given that the content of the Design Code SPD is derived from guidance contained within the National Model Design Code Parts 1 and 2, it would be prudent for the Council to wait for the outcome of this update and take the latest guidance into account before adopting the document. This would also enable further engagement with the consortium on the SPD in the meantime.

The consortium does not object to the vision of the Code and its aspirations for high quality design and development, but the Code needs to be consistent, accurate and practical.

The consortium would welcome a workshop with the Council to work through the Code in detail to achieve this aim. We recommend that the separate detailed commentary submitted by the consortium parties should form the basis of these discussions.

We look forward to working with the Council in refining the Design Code SPD to facilitate the delivery of SW Rugby and request that a workshop is held between the consortium and officers at the Council at the earliest opportunity.

[REDACTED]

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<sup>1</sup> [Written statements - Written questions, answers and statements - UK Parliament](#)





These representations have been prepared by Homes England on behalf the consortium at SW Rugby and have been signed-off by the following:

|            |
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| [Redacted] |
| [Redacted] |
| [Redacted] |
| [Redacted] |
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| [Redacted] |
| [Redacted] |
| [Redacted] |





**From:** [Ben Frodsham](#)  
**To:** [Local Plan](#)  
**Subject:** South West Rugby Design Code SPD Consultation  
**Date:** 10 March 2025 10:55:02  
**Attachments:** [image001.png](#)  
[SW Rugby Design Code SPD 10.03.2025.pdf](#)

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Dear Development Strategy Team

On behalf of the consortium at South West Rugby, please see attached a joint consultation response on the Draft South West Rugby Design Code SPD for your consideration.

The consortium members will also be submitting separate representations on the detail contained within the draft Design Code SPD in relation to their respective parts of the allocation.

We look forward to meeting with the Council to take forward the actions set out in the attached letter.

Kind regards

Ben

**Ben Frodsham**

Head of Planning and Enabling

Mobile: 07768 612541

DD: 0207 393 2218



[REDACTED]

We believe that affordable, quality homes in well-designed places are key to improving people's lives.

We make this happen by using our powers, expertise, land, capital, and influence to bring both investment

to communities and to get more quality homes built.

**Please forward any Freedom of Information Requests to:**

[REDACTED]

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Please forward any requests for information to: [infogov@homesengland.gov.uk](mailto:infogov@homesengland.gov.uk)

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OFFICIAL



**From:** [Boden, Elizabeth](#)  
**To:** [Local Plan](#)  
**Cc:** [Anthony Franklin](#); [Hayley Smith](#)  
**Subject:** Historic England response South West Rugby Design Code SPD & SEA Screening opinion  
**Date:** 13 March 2025 12:54:22  
**Attachments:** [image979486.jpg](#)  
[HE Response SW Rugby Masterplan Design Code SPD March 2025.pdf](#)

---

Dear Local Plans Team,

Please see the attached response from Historic England.

Please would you acknowledge receipt?

Kind regards

Elizabeth Boden (MRTPI) | Historic Environment Planning Adviser |

Telephone: 07823 878 657 Working days: Tuesday / Wednesday / Thursday AM

[REDACTED]

Birmingham | B1 2LH |

[REDACTED]



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Homes  
England

The Housing and Regeneration Agency

Development Strategy Team  
Town Hall  
Evreux Way  
Rugby  
CV21 2RR

10 March 2025

**FAO Ms. Abigail Murphy**

### **South West Rugby Design Code (February 2025) Consultation**

Please find enclosed Homes England's response to the RBC Design Code Consultation Draft dated 12th February 2025.

Homes England are supportive of Rugby Borough Council (RBC) producing a Design Code for the entirety of the South West Rugby Allocation. This document will be a useful tool for RBC to expand on the design aspirations set out within the adopted South West Rugby Masterplan Supplementary Planning Document (SPD) (December 2024) and ensure a coordinated design response across a number of landowners, developers and planning applications. As described in the National Model Design Code, Codes are important because they provide a framework for creating healthy, safe, green, environmentally responsive, sustainable and distinctive places with a consistent and high-quality standard of design.

The consortium comprising Homes England, Taylor Wimpey and Catesby Estates are working collaboratively to deliver a comprehensive development of the SW Rugby allocation and are broadly supportive of Rugby Borough Council (RBC) producing a Design Code for the entirety of the South West Rugby Allocation.

However, further engagement with the consortium beyond the presentation of initial plans at the consortium meeting in November 2024 would have been beneficial prior to the draft SPD being published for public consultation.

It is essential that the Design Code SPD does not impede the delivery of the allocation nor create ambiguity or confusion and ultimately delays in the determination of planning applications. Importantly,





The Code must be consistent with the Local Plan and the recently adopted South West Rugby SPD (December 2024);

The plans included within the Code need to be accurate and reflect real site conditions, consented schemes and live planning applications;

The requirements of the Code must be consistent with national policy and standing guidance. Any departures need to be rational, properly evidenced and justified; and

The Code must accept the need for flexibility in its application to accommodate site conditions, development viability and practical delivery.

We are also aware that the MHCLG intends to update the National Design Guide and National Model Design Code in Spring this year.<sup>1</sup>

Given that the content of the Design Code SPD is derived from guidance contained within the National Model Design Code Parts 1 and 2, it would be prudent for the Council to wait for the outcome of this update and take the latest guidance into account before adopting the document. This would also enable further engagement with the consortium on the SPD in the meantime.

It should be acknowledged that South West Rugby has an extensive planning history. A number of planning applications have been submitted and approved by RBC in advance of the production and consultation of this allocation-wide Design Code. A summary of those related to Homes England's land holdings is set out below:

Homestead Link Road and associated landscape buffer – Approved at Planning Committee in March 2024, and S106 signed, and decision notice issued on 18 February 2025.

Upgrades to Cawston Lane and a new road Dunkleys Street (referred to as Community Spine Road in the SPD) submitted in August 2024 and to be determined at Planning Committee in the next few months

A Hybrid Planning Application for up to 1600 homes, a mixed-use centre, older peoples housing, primary school, secondary school, public open space and two new roads in detail to be submitted in May 2025.

Homes England's proposals for the hybrid application have been informed by site surveys and assessment work, two rounds of public consultation, design reviews, market and viability assessments, extensive negotiations and close collaboration with the consortium members, and extensive pre-application discussions with the relevant statutory bodies including Rugby Borough Council's Design Code team and Warwickshire County Council's Highways team. The enclosed consultation response aims to provide RBC with suggestions to enable alignment with the approved and submitted planning applications and to assist with the ongoing coordination of development on the remainder of the allocation.

Furthermore, Homes England will be submitting a Design Code as part of the Hybrid Planning Application that covers their land holding. It is anticipated that this Code, should it be approved by RBC, will require future Reserved Matters Applications (RMA) to demonstrate accordance with the site-specific Design

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<sup>1</sup> [Written statements - Written questions, answers and statements - UK Parliament](#)





Code. Homes England request that RBC's Design Code therefore acknowledges the planning application history of South West Rugby in their Design Code and makes allowance for Design Codes for parts of the allocation to come forward and therefore, once approved, take precedence for the determination of RMAs in these areas.

The enclosed consultation response is set out in two parts as outlined below. The other consortium members are due to submit their own responses particularly where they have specific comments that relate to their own landholdings. The two parts are as follows:

- a) A tabulated response with comments on the general approach to the Design Code as well as specific commentary and suggested amendments to specific pages and codes.
- b) A mark up of various drawings included within the Design Code with suggested amendments to align the proposals with submitted or soon to be submitted planning applications. These comments are specific to Homes England's land holdings.

The tabulated response has been colour-coded to represent Homes England's priority of amendments. The colour coding is as follows:

**Red:** Highest priority action due to significant concern regarding content of the Design Code. Consultation response sets out requests for removal or a significant amendment to be made to the Code, Text or Graphic to ensure successful delivery of SW Rugby.

**Amber:** Moderate priority action with a request for a revision to the Code, Text or Graphic.

**Green:** Suggestions to assist in improving the Code's usability by future RMAs and RBC Development Management Officers.

Homes England have liaised with RBC regarding the SW Rugby Allocation Design Code and would like to continue these discussions to support the successful delivery of the Sustainable Urban Extension. We trust the enclosed assist RBC in coordinating the Code with the existing planning history and welcome further engagement in the form of a workshop with the Council and consortium to work through the Code in detail

We look forward to working with the Council in refining the Design Code SPD to facilitate the delivery of SW Rugby and request that a workshop is held between the consortium and officers at the Council at the earliest opportunity.

Yours sincerely

[Redacted signature block]





## RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

Homes England's Consultation Responses Table for South West Rugby Draft Design Code  
Response is to be read alongside the cover letter and Framework Plan Markups

|                                      |  |
|--------------------------------------|--|
| Prepared By:                         | LDA Design on behalf of Homes England  |
| Key for Comments & Suggested Actions |  |
|                                      | Highest priority action due to significant concern regarding content of the Design Code. Consultation response sets out requests for removal or a significant amendment to be made to the Code, Text or Graphic to ensure successful delivery of SW Rugby. |
|                                      | Moderate priority action with a request for a revision to the Code, Text or Graphic.   |
|                                      | Suggestions to assist in improving the Code's usability by future RMAs and RBC Development Management Officers.  |

| Comment ID                            | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response   | Recommendation   |
|---------------------------------------|----------------------|--------------------------------|--|--|
| General Comments on Draft Design Code |                      |                                |  |  |
| 0.1                                   | Whole Document       | General                        | <p>We have submitted this consultation response with a supporting document titled "Draft Design Code SPD Framework Masterplan Comments". This document is intended to provide more specific comments on the graphics and figures utilised within the Design Code document and identify amendments that will support the coordination of this document with the submitted, and soon to be submitted, planning applications within Homes England's Landholding.</p> <p>Where comments within this document cross reference to the "framework markup" please refer to the appendix accordingly.</p> | Amendments to masterplanning graphics as per supporting appendices.  |
| 0.2                                   | Whole Document       | General                        | <p>We have a general concern about the document's accordance with accessibility guidance in terms of graphical representation of information. This may therefore impact the useability of the document. For example, it is generally advised that tables are not used within accessible documents unless they are representing numerical information.</p>  | Suggest document is further reviewed against accessibility guidance. |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response   | Recommendation   |
|------------|----------------------|--------------------------------|--|--|
| 0.3        | Introduction         | General                        | <p>We would request the inclusion of additional information within the front end of the Design Code relating to committed developments. It would be beneficial for users to understand what proposed development, at the point of adoption, has been granted consent. This would provide an evidential basis for the material of the SPD.</p> <p>In this regard, we feel the codes and associated graphics throughout should be amended to reflect the ongoing (R24/0733) and approved (R22/0928) planning applications given the extensive engagement, public consultation, environmental work, and landowner negotiations which have shaped the designs.</p>   | Inclusion of committed developments and update of drawings to reflect designs. |
| 0.4        | Introduction: Page 6 | General                        | <p>We request that further context is added to the definitions of 'Must', 'Should' and 'Could'. For example, "Must" is an absolute term and indicates certainty, whereas we consider a degree of variance should be afforded to support innovation and nuances across the allocation. In some cases, it is impossible to achieve the musts, so some requirements would be better to be re-categorised as set out in further detail below.</p> <p>It is considered that certain caveats could be included to the definition of 'Must', such as "Subject to the inclusion of appropriate and proportionate mitigation".</p>  | Amend Definitions  |
| 0.5        | Pages 1-6            | General                        | <p>Inclusion of text which explains the relationship between the RBC Design Code and site-specific design codes. This will provide clarity for the approval process of future RMAs for RBC Development Management Team. Additional wording suggested as follows:</p> <p>"If a subsequent site-specific design code comes forward for an area of SW Rugby and is approved as a part of a planning application, it is to take precedence over the RBC Design Code and be used to assess compliance. A site-specific code must ensure consistency across the allocation by broadly according with the strategic design guidance set out within the RBC Design Code relating to matters that are not subject to site-specific design codes."</p> | Inclusion of new text  |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response  | Recommendation             |
|------------|----------------------|--------------------------------|---|----------------------------|
| 0.6        | Whole Document       | General                        | Suggestion that all diagrams are clearly indicated throughout as either 'illustrative' or 'indicative' and explained as such. It is our view that this needs to be clearer as the purpose is to inform onward development design and there is no certainty over delivery. The diagrams are helpful to explain design principles, but we do not feel they should be mandatory as they may inadvertently stifle innovative design.  | Amendments to all Graphics |
| 0.7        | Nature               | General                        | <p>Whilst we support the inclusion of a chapter focusing on Nature and we recognise its importance in delivering a successful place, we are concerned that the current draft wording lacks the clarity that is required and may restrict suitable development across South West Rugby and therefore impact deliverability.</p> <p>Additional information is required to support some of the statements to ensure appropriate interpretation by future applicants and the RBC Development Management team. For example, we agree with the principle of retaining existing trees and hedgerows, however, the diagrams suggest that all hedgerows are to be retained across the site which is not possible to achieve alongside the delivery of circa 4,000 homes, a Mixed Use Centre, Primary and Secondary Schools and associated infrastructure. Please refer to the individual code comments outlined in section 4.3 of this response document. The purpose of these amends is to ensure there is an appropriate balance between retention and protection of existing habitats and the delivery of new multifunctional green and blue infrastructure that is responsive to up-to-date environmental surveys and futureproof designs.</p> | Review of Section          |
| 0.8        | Public Space         | General                        | The Preservation Codes in the Public Space section overlap and repeat other codes within the nature section. We suggest this might be better covered by signposting to those codes, duplication under different sections of the code may result in contextual confusion for users.  | Review of Section          |
| 0.9        | Public Space         | General                        | Numerous codes within the Public Space section are focused on movement and access within streets and not actually public spaces. Suggest this is reviewed and where possible keep movement focused codes within the movement section of the code as we have found it difficult to read this in combination with the movement section given there are various overlaps. Duplication under different sections of the code may result in contextual confusion for users.   | Review of Section          |
| 0.10       | Built Form           | General                        | It is unclear if the tables within this section are codes or guidance. We suggest that wording is added to clarify the requirements using words such as 'must', 'should' or 'could'. Our interpretation is that this is general guidance and not prescriptive design codes. If they are codes, we believe this level of detail needs to be an aspirational in nature, thus adopting "could".  | Amend Codes                |



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| Comment ID              | Relevant Page Number | Relevant Code Number / Graphic                              | Homes England's Response  | Recommendation                          |
|-------------------------|----------------------|---|---|---|
| Chapter 1: Introduction |                      |   |   |   |
| 1.1                     |                      |   | No comments on this section, covered in "general"   | Refer to comments in General            |
| Chapter 2: Analysis     |                      |   |   |   |
| 2.1                     | Page 10              | Site Status Graphic 1: Planning History & Allocation Status | <p>For the figures included on the page, the legend does not include the land coloured red, orange or green. Could these please be included for clarity.</p> <p>Removal of reference to "Phasing" within the key as it is likely to give an incomplete or potentially misleading picture given the total number of stakeholders involved.</p> <p>Inclusion of the enhancement of Cawston Lane and the Community Spine Road as core transport infrastructure developments fundamental to the wider area's delivery.</p>  | Amend Graphic and Graphic Key           |
| 2.2                     | Page 10              | Site Status Graphic 2: Land Ownership                       | In light of the changing land ownership status within the allocation, suggest this diagram is removed from the code as it may cause confusion and become out of date quickly.   | Amend or Remove Graphic and Graphic Key |
| 2.3                     | Page 12              | Landscape Environment: Text                                 | We suggest that in addition to providing a summary of the area's topography, it would be beneficial to include some text on the varying drainage catchments. This would provide helpful context.  | Inclusion of additional text            |
| 2.4                     | Page 12              | Landscape Environment: Graphic                              | <p>It is suggested that the graphic differentiates between 'Woodland' and 'Ancient Woodland'. In general, the legibility of trees and the implied suggestion that all are TPO'd needs to be reviewed. We have concerns about the lack of clarity and potential confusion this map may create given some of the codes noted later on within the document.</p> <p>Please note the extents of the Homestead Link Road area need to be revised as it includes temporary compound areas which are for construction only.</p> | Amend Graphic and Graphic Key           |
| 2.5                     | Page 16              | Site & Immediate Context: Steads                            | <p>Amend text to the following:</p> <p>'The site incorporates a number of existing homes, some of which are to be retained. In addition, there are a number of existing farm buildings that range in their quality and condition. Potential opportunities to retain the highest quality farm buildings should be further explored, particularly where these buildings present an opportunity to contribute to the character and identity of the place'.</p>   | Inclusion of additional text            |



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|------------|----------------------|---|---|-----------------------|
| 2.6        | Page 16              | Site & Immediate Context:<br>Employment Buildings | Given that some of the Employment Buildings are already delivered on site, there is an opportunity to establish a benchmark or reflect on lessons learnt. We would request that further text is included here which includes a summary of the approved and delivered landscaping. For example, future employment development on the safeguarded land should consider visual and acoustic screening to reduce the impacts on future residential development.   | Amend and expand text |
| 2.7        | Page 18              | Movement & Connections: Text                      | <p>This section misses existing connections (such as the existing bus stops and routes in the vicinity of the site) and confuses constructed infrastructure (such as that in the Tritax land), with consented infrastructure (Homestead Link Road), and future planned connections with live planning applications.</p> <p>The reference to proposed sustainable transport link at "the south of Cawston Lane" does not reflect the preferred arrangement for Homes England proposals.</p> <p>Please add reference to the existing bus routes as there are a significant number of bus routes and stops within the surroundings that get no mention here.</p>   | Amend text            |
| 2.8        | Page 18              | Movement & Connections: Graphic                   | <p>The Graphic on Page 18 does not reflect Figure 2 of the South West Rugby SPD, Policy DS9 of the Local Plan, nor the proposed Homes England development or the details in the submitted planning application for the Community Spine Road / Cawston Lane Enhancements (R24/0733). We recommend that the Graphic is updated to align with the submitted and approved planning applications and the following should be updated to reflect Figure 1 of the adopted SPD:</p> <ul style="list-style-type: none"> <li>• The Community Spine Road should connect with the HLR application (linking it to Alwyn Road).</li> <li>• Cawston Lane should be updated at its southern end to remove reference to the sustainable transport link.</li> <li>• The Public Right of Way south of the B4429 should be re-aligned to accord with the proposals put forth in the approved Homestead Link Road Planning Application (R22/0928), or at least reference made in the text that this route will be realigned following the construction of the road.</li> </ul> | Amend Plan            |



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| Comment ID   | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response   | Recommendation               |
|--|----------------------|--------------------------------|--|------------------------------|
| Chapter 3: Vision                                      |                      |                                |  |                              |
| 3.1  | Page 22              | Framework Masterplan: Graphic  | <p>The Graphic on Page 22 does not reflect the proposed development or the details in the submitted planning application for the Community Spine Road / Cawston Lane Enhancements (R24/0733). We recommend that the Graphic included is updated to align with the submitted planning application, the following is also noted:</p> <ul style="list-style-type: none"> <li>• Graphic included doesn't match alignment of Cawston Lane / Community Spine Road planning application which is in the public domain.</li> <li>• Cawston Lane needs to be shown as a main route and not a local road.</li> <li>• Compound areas need removing from HLR application area, these are for construction purposes only.</li> <li>• Green Infrastructure should be changed to match emerging schemes (which are providing larger areas compared to the Framework Masterplan included within the document).</li> <li>• There is an inconsistency between the buffer to Cawston Spinney and no buffer being shown to Cock Robin Wood which is a Local Wildlife Site. Please see our later comments regarding suggested buffers.</li> </ul> | Amend Graphic                |
| Chapter 4: Code - Section 1 - Context and Coordination |                      |                                |  |                              |
| 4.1.1  | Page 24              | Context & Co-Ordination: Text  | <p>Whilst we understand what the introductory text is seeking to outline, we are concerned that the document reads as though the Consortium is not already working together collaboratively, which doesn't reflect the reality of the situation. This Code is a useful tool to ensure coordination across the allocation, but it should also recognise the collaborative approach, Homes England, Catesby and Taylor Wimpey are engaging together and with RBC and WCC.</p> <p>Could this collaboration and the work done to date be clearly mentioned in the narrative as well as the extensive pre-application engagement that has been undertaken. We feel that this would benefit the deployment of the code for future developments, acknowledging the corroborators within the allocation.</p>   | Inclusion of additional text |



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| Comment ID                             | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response   | Recommendation   |
|--|----------------------|--------------------------------|--|--|
| 4.1.2                                  | Page 24              | CO.01 - CO.03                  | <p>CO.01 and CO.02 conflict with each other. It is not possible to show the existing context and the neighbouring schemes where information is available. We agree with the principle of ensuring applications consider their neighbouring context to ensure appropriate design response. We suggest that Code CO.01 is removed and CO.02 retained. While the existing context is useful for site analysis, the purpose of this Code is ensuring coordination across the allocation and therefore the existing context is not helpful.</p> <p>We suggest Codes CO.03 is amended to be general text about approach rather than a must.</p> <p>We recommend this is accompanied by further clarification such as:</p> <p>"Key strategies and principles are anticipated to be coordinated as a part of outline applications with further detail on built form, materiality and landscaping coordinated as a part of Reserved Matter Applications."</p> | Amendment or Removal of Design Codes CO.01 & CO.02 & CO.03 |
| Chapter 4: Code - Section 2 - Movement |                      |                                |  |  |
| 4.2.1                                  | Page 26              | Introduction: Vision Text      | We recommend inclusion or reference to "Active Travel" in line with Para 109.e of NPPF for a vision-led approach   | Inclusion of additional text                               |
| 4.2.2                                  | Page 27              | MO.04                          | We question the accessibility of the graphic and potential confusion given the range of development types covered within the graphic associated with MO.04, and suggest it is removed, the content may be better suited in the "public space" section.   | Removal of Graphic   |
| 4.2.3                                  | Page 27              | Street Network: Case Study     | Could a more local or regional reference be used rather than Poundbury?  | Amendment to Case Study                                    |
| 4.2.4                                  | Page 28              | MO.13                          | For MO.13, we feel there should also be a reference to equestrian users, given the number of Bridleways in the area.   | Amend text   |



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| Comment ID | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response   | Recommendation                        |
|------------|----------------------|--------------------------------|--|---------------------------------------|
| 4.2.5      | Page 28              | MO.15                          | <p>This does not reflect the need for context specific design that responds to constraints which mean that these could not be delivered in practice. DfT Inclusive Mobility specifies 2m as a minimum that should be provided, to reflect feasibility and constraints.</p> <p>Throughout the document, precedents do not use "conventional kerbs." We have concerns that this code, as currently written, will create future misunderstandings and is likely to limit potential innovation as detailed designs are developed.</p> <p>We suggest this reference is removed or revised to 'clearly demarcated' or 'demarcated by a kerb.'</p>  | Amend text                            |
| 4.2.6      | Page 28              | MO.18                          | <p>South West Rugby itself cannot deliver cycle connections to the town centre or rail stations, it is limited to its own site area, therefore this should not be a mandatory requirement. It is however making contributions to those routes included within the revised Appendix K within the adopted SW Rugby SPD. We suggest the wording is revised to use more flexible language such as "towards".</p>   | Amend Text                            |
| 4.2.7      | Page 28              | MO.19                          | <p>Best Practice guidance on Buses in Urban Developments specifically notes that there should be a degree of flexibility on walking distances to bus stops.</p> <p>We do not think is possible or appropriate to provide this in all locations within SW Rugby and to a large degree is outside of a developer's control. As worded, this does not appear to factor in the existing bus stops or optioneering to date on the viability of new bus routes for operators. We suggest the wording is revised accordingly to enable compliance. An important consideration is the positioning of bus stops in relation to the destinations that the bus routes are serving, we suggest some text regarding this is included within the Code. For example, we would advocate for bus stops to be located next to the Secondary School to encourage non-car travel, and close to the Mixed Use Centre.</p> | Amend Text                            |
| 4.2.8      | Page 28              | MO.20                          | <p>Please revise to a "could" within the code for integration of mobility hubs, as we are not able to commit to this at bus stops across SW Rugby. See further comments on the mobility hub section, we have further explained this below at reference 4.2.24.</p>   | Amend Text                            |
| 4.2.9      | Page 28              | MO.28                          | <p>Whilst we agree in principle, we are concerned by the lack of nuance within this code. Inclusive Mobility guidance specifies this as something that should be considered. Dropped kerbs should be located by need and informed by the proposed development rather than solely being placed every 100 metres. Suggest the code is reviewed and the above context is added.</p>   | Amend Text                            |
| 4.2.10     | Page 29              | MO.29 & MO.31                  | <p>This contradicts MO.26 which uses should. Given the use of the phrase 'most intersections' and the early strategic stage of this work, we feel this code needs to be amended to a should.</p> <p>The blanket specification in MO.31 also restricts the most appropriate form of junction for each specific location, based on a site specific set of constraints and design requirements. The code may benefit from rewording to ensure it is clear what is being requested.</p>  | Amend wording from 'must' to 'should' |



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| Comment ID | Relevant Page Number | Relevant Code Number / Graphic                       | Homes England's Response   | Recommendation        |
|------------|----------------------|--|--|-----------------------|
| 4.2.11     | Page 29              | Street Network: Text                                 | <p>We feel it would be beneficial if additional street types are included within the 'tertiary' category. This would support the street hierarchy principles and create a variety in the transition between the tertiary streets identified in the plan on page 34 and the Tertiary Street 2 (Cat 4B) which are private drives. Examples include lanes, shared surface streets, courtyards and mews streets. These typologies are also referred to within Manual for Streets.</p> <p>We suggest wording is added to the characteristics of Tertiary Street 2 (Cat 4B) to ensure these streets provide onward pedestrian connectivity is added to create a permeable network of walking routes.</p>   | Inclusion of new text |
| 4.2.12     | Page 30              | Street Network – Principles: Text                    | <p>Under 'Walkability' – we suggest a reference is added regarding connecting pedestrian routes into the surroundings.</p> <p>Under 'Direct Cycling' we suggest the use of the word radial is replaced with 'safe, attractive and convenient' as the ability to deliver radial routes will be determined by a number of factors beyond the developers' control.</p> <p>Under 'Spine Streets' we do not agree with this as a mandatory requirement because, as worded, this would create significant delivery and viability challenges. In addition, we highlight that there are instances where this suggestion is not possible based on the framework plans in this design code, resulting in a delivery contradiction. We suggest the wording is reviewed and the word 'must' changed to 'should'. We would also question the use of the term "superblock" in the wider context of Rugby and request an alternative is used.</p> | Amend text            |
| 4.2.13     | Page 31              | Street Network – Case Study Network Example: Text    | <p>We suggest the use of the word radial is replaced as per 4.2.13 above.</p> <p>We have concern with the reference to public transport and 400 metre walking distances, this as a commitment is not achievable in all instances across SW Rugby. Flexibility should be integrated into the text to support deliverability. Please refer to notes above under 4.2.7 above.</p> <p>We would also question the use of the term "superblock" in the wider context of Rugby and request an alternative is used.</p>  | Amend Text            |
| 4.2.14     | Page 31              | Street Network – Case Study Network Example: Graphic | <p>This diagram is very theoretical and gives no sense of scale. This is concerning given the site has a significant number of existing public rights of way and site-specific landscape features. We are concerned about potential misunderstandings in the future given the theoretical nature of the diagram. We do not think it contributes meaningfully to the code and points are made on the previous page, so we recommend removing the page.</p>  | Remove Graphic        |



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|------------|----------------------|--|---|-----------------|
| 4.2.15     | Page 32              | MO.33  | How does this sit with intended speeds for Cawston Lane / Community Spine Road? There are existing roads which require TRO to change speed limits, a process which sits outside the planning system.<br>The submitted planning application (R24/0733) is proposing 20mph around the Primary School and Mixed Use Centre which is also a bus route.                      | Amend Page      |
| 4.2.16     | Page 32              | MO.34  | Sub-criterion 1 and 6 suggests using junction types, but other code points restrict the use of different types of junctions.<br>We recommend that sub-criterion (3) is re-written and simplified. We also question the use of 'working' in this context.<br><br>Can RBC confirm WCC Highways Design are aligned with points 1-7 to ensure that the code is deliverable. | Amend text      |
| 4.2.17     | Page 32              | Street Network – Network Speed Reduction: Graphic  | Suggest Diagram is removed. Again, we are concerned by this diagram as it is very theoretical and gives no sense of scale. This is concerning given the site has a significant number of existing public rights of way and site-specific landscape features. As per 4.2.15, we are concerned about potential misunderstandings this may create.                         | Remove Graphic  |
| 4.2.18     | Page 33              | MO.35  | Can RBC confirm WCC are aligned with points 1-7 to ensure that the code is deliverable.   | Additional Text |
| 4.2.19     | Page 33              | Street Network – Tertiary Street Networks: Graphic | Suggest Diagram is removed in line with comments above (4.2.15)   | Remove Graphic  |



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|------------|----------------------|--------------------------------|---|------------------------|
| 4.2.20     | Page 34              | MO.36 & MO.37                  | <p>We are concerned by the definitive nature of the wording here and in the text in MO.37 below, in addition to the illustrative diagram and associated wording. Suggest text is reviewed and the use of the words 'must' and 'mandatory' amended to 'should'</p> <p>Our comments on the graphic are as follows:</p> <ul style="list-style-type: none"> <li>Route 4 shows Cawston Lane as one continuous street from Dunchurch northwards to Cawston. This will not be the case as established by the HLR approved planning application and the SW Rugby adopted SPD masterplan. There will be a pedestrian / cycle connection between Cawston Lane south and the Homestead Link Road.</li> <li>Considering the above change to Cawston Lane the diagram should reflect the fact that the southern part of Cawston Lane will more likely be a tertiary street and should not imply that proposals will be upgrading the southern part of Cawston Lane next to the Dunchurch.</li> <li>Tertiary streets shown on Safeguarded land is unhelpful. If the Safeguarded Land is developed as employment it would enable HGVs to bypass the bus gate (Route 7) which would negatively impact the agreed transport strategy as part of the Local Plan and SPD assessments. It would defeat the purpose of including a bus gate on Route 7 and preventing through traffic as per WCC's original requirements. It also negatively impacts landscape and ecological constraints between Homes England and safeguarded land.</li> <li>The connections between Cawston Lane and Community Spine Road on both sides of the indicated Mixed Use Centre are inconsistent with our emerging proposals and may encourage rat runs / cut throughs that would undermine the transport strategy.</li> </ul> <p>For further information, please see the accompanying Framework Plan Mark-Ups.</p> | Amend text and diagram |
| 4.2.21     | Page 34              | MO.38                          | <p>We do not understand this code as currently worded. What is the 'main street network' defined as? Please could further clarity be added to the code and/or the text rewritten. It states tertiary streets are not depicted in the framework, but the associated plan shows tertiary streets.</p>   | Amend text             |
| 4.2.22     | Page 35              | Active Travel Framework: Text  | <p>There is no associated code reference to secure the active travel framework (MO.??) Criterion (2) on the corresponding plan appears to be associated with an existing bridleway rather than footpath.</p> <p>Criterion (5) - we request that some text is added to provide a degree of flexibility for diverting footpaths for the purpose of delivering development (as outlined in the SW Rugby SPD). For example, slight diversions might be required to allow widening of routes to retain existing trees and hedgerows, or to enable suitable development areas to come forward.</p>  | Amend text             |



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| Comment ID | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response  | Recommendation                                  |
|------------|----------------------|--------------------------------|---|---|
| 4.2.23     | Page 36              | Bus & HGV Network: Graphic     | <p>We have significant concerns and disagree with this diagram as shown. Our view is that this page needs separating into two.</p> <p>The bus network is different to the HGV network as HGVs won't be able to pass through the bus gate on the sustainable transport link. The HGV plan needs to reflect the HGV routing strategy approved as part of the Tritax employment scheme and as agreed within the Local Plan assessment process.</p> <p>In addition, we note that buses also will not be passing through the land east of Alwyn Road. They will go down Alwyn Road and rejoin the HLR as per WCC's original plans, approved Homestead Link Road strategy and as set out within the Local Plan assessment. If helpful we can share the original plan.</p> | Amend / Remove Graphic and separate Bus & HGV's |
| 4.2.24     | Page 37              | MO.33                          | <p>MO numbering error - MO.33 is already used on p32. The mobility hub coding is overly prescriptive. We suggest these codes are removed or integrated into a broader section on public transport &amp; mobility.</p> <p>If included, it is our view that all of these codes should be amended to "should" or "could" because defining mandatory requirements at this stage is overly prescriptive.</p> <p>We are concerned by the suggestion that there will be multiple Mobility Hubs. To date, we have explored a single hub within the Mixed-Use Centre. Suggest edit to "Mobility hub(s) should provide a choice..." this would enable a focus on the clustering of different modes of transport.</p>  | Amend text, revise to "should"                  |
| 4.2.25     | Page 37              | MO.35 & MO.38                  | <p>We suggest the use of "should" for the primary community mobility hub and reference to the smaller supplementary mini hubs is removed or amended to be included as an aspiration (could) as their presence or deliverability has not been discussed or tested to date.</p> <p>The delivery of the hubs is dependent on others, so this is not something a developer can commit to so it is not realistic for the drafting of the code.</p> <p>We are concerned by the use of "car club vehicles" in combination with MO.35 as there are a number of complications with delivering on-street car club bays in proximity to "all bus stops."</p>   | Amend text, and revise to "must" to "should"    |



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|------------|----------------------|--------------------------------|---|--------------------------------|
| 4.2.26     | Page 37              | MO.39                          | <p>Whilst we understand what is being sought here, we feel individual elements should have an appropriate degree of flexibility at this early stage of masterplanning. If RBC consider it important that individual elements are referenced in this code, we feel this should be done as an aspiration (could) only at this stage to allow further discussion between developers, RBC and WCC to understand the requirements and delivery potential.</p> <p>To support further coordination on this, please see more detailed comments on the wording of a number of the bullet points:</p> <ul style="list-style-type: none"> <li>• Bullet Point 1 to be amended to "Proximity to a bus stop"</li> <li>• Bullet Point 2 to be amended to "Nearby Car Club Parking"</li> <li>• Bullet Point 3; remove "including electric and cargo bike hire" as we cannot commit to this at this time. We could support more general guidance around cycle and cargo bike hire as an aspiration.</li> <li>• Bullet Point 5; remove "accessible 24/7" as we cannot commit to this at this time.</li> </ul> | Amend text, revise to "should" |
| 4.2.27     | Page 37              | MO.42                          | Covered cycle parking cannot be a requirement for all cycle parking as implied by this code. Sheffield types of stands are typical and recommended as per code MO.46. Covered parking could be included as an aspiration  | Remove or Amend Code           |
| 4.2.28     | Page 37              | MO.43                          | We agree with the principle of promoting this but it may not be possible in every case and therefore recommend this revised to "should".  | Amend text, revise to "should" |
| 4.2.29     | Page 37              | MO.44                          | We find this code confusing and therefore should be rewritten or removed. It is not clear which front entrances or side access points are being referred to.  | Amend or remove code           |
| 4.2.30     | Page 37              | MO.45                          | We agree with the principle of promoting this but it may not be possible in every case and therefore recommend this revised to "should".  | Amend text, revise to "should" |
| 4.2.31     | Page 37              | MO.46                          | <p>We agree with the principle of promoting this but it may not be possible in every case and therefore recommend this revised to "should".</p> <p>Notwithstanding the agreement in principle, it is unclear what is meant by provided at "key nodes". In the context it is assumed "key nodes" are suggesting good visibility and passive surveillance of cycle stands to support their use.</p> <p>Also unsure of the specification of Sheffield style stands, rather than context specific solutions depending on the users, duration of stay etc.</p>   | Amend text, revise to "should" |



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|------------|----------------------|--------------------------------|---|---------------------------------------|
| 4.2.32     | Page 38              | MO.48, 50, MO.51, MO.52        | We agree with the principle, but it just replicates the principles set out in the National Model Design Code (in the case of MO.48, this is an exact word for word replication of M.3.i. para 44 of the part 2 guidance notes).<br>MO.52 contradicts the NMDC guidance, which uses normally, so would be a should, rather than a must.  | Amend text, revise “must” to “should” |
| 4.2.33     | Page 38              | MO.53                          | Semi-basement or decks are not currently viable nor should be committed too. We consider that aspirational language here would be much more suitable, such as 'encouraged to' or 'could', given the viability challenges the project is already facing.<br><br>In the second sentence, we recommend an amendment of “must” to “should” as achieving this is largely dependent on a final agreement to parking quantum.<br><br>The above changes would enable flexibility to provide shared residential parking at surface level, in basements or decks. | Amend text, revise to “should”        |
| 4.2.34     | Page 38              | MO.56                          | We question the reference to only perpendicular bays and not parallel or echelon parking. It is currently assumed all of these types could be delivered on-street, so would question the inclusion of this code. Alternatively include reference to all options.  | Amend Code                            |
| 4.2.35     | Page 38              | MO.57                          | Please could further clarity be included on what “bay” this code is referring too.  | Amend Code                            |
| 4.2.36     | Page 38              | MO.58                          | We suggest that this code is amended to “should” rather than “must” and the figure of 12 is uplifted to 20 in accordance with the council's current parking standards.<br><br>We also suggest that “overlooked” is amended as parking courts are often reliant on both active and passive surveillance.   | Amend text, revise to “should”        |
| 4.2.37     | Page 38              | MO.59                          | We agree with the principle of promoting this, but it may not be possible in every case and therefore recommend this revised to “should”.   | Amend text, revise to “should”        |
| 4.2.38     | Page 38              | MO.60                          | We have concerns about the level of prescription and use of the word “must” as there may be solutions that fall in between side and front parking. We suggest this is amended to “should”.  | Amend text, revise to “should”        |
| 4.2.39     | Page 38              | MO.61                          | Whilst we generally understand the principle of this code, we have concerns about the level of prescription and use of the word “must” and suggest this is replaced with “should”. We also have concerns with the reference to screening and would request this is amended or removed as the inclusion of landscaping could be done in different ways than only the suggested hedge. It is quite restrictive in terms of what would be possible to deliver.   | Amend text, revise to “should”        |



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|------------|----------------------|--------------------------------|---|--------------------------------|
| 4.2.40     | Page 38              | MO.62                          | We recommend that this code is rewritten to re-read: "Parking in rear gardens should carefully consider passive surveillance, nighttime safety and potential impacts on private amenity space."   | Amend text                     |
| 4.2.41     | Page 39              | MO.69                          | It is unclear what 'these requirements' are, how they differ from the requirements already set out in Building Regs and other design guidance.,lit is our view that guidance is to be referenced as a "should" and not made into mandatory requirements via this design code.   | Amend text, revise to "should" |
| 4.2.42     | Page 39              | MO.71 – MO.75                  | <p>We appreciate these outline best practices, but these are very prescriptive and fix solutions when using 'must'. Suggest they are all amended to be 'should'.</p> <p>Specific code comments as follows:</p> <ul style="list-style-type: none"> <li>On MO.71 - front of properties should also be allowed if appropriately integrated.</li> <li>On MO.72 – suggest changing to a should. If terraced housing is used in the Mixed Use Centre where vehicle access is limited, houses could also use communal bin stores (which will already be in place due to apartment buildings).</li> <li>On MO.73 - we do not agree that these need to be within the building footprints and in some places blank elevations may be required to deliver these. Communal bin stores could be in a separate building or high-quality ancillary structure and allowance within the wording of the code should be left for these options to be explored. Principles around their location, for example in well-lit and overlooked locations to avoid Anti Social Behaviours would be welcomed.</li> <li>MO.75 – This is more complicated with apartment or mixed use buildings in a pedestrian priority area, request amendment to should. (Also correct spelling error of 'al' to 'all')</li> </ul> | Amend text, revise to "should" |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID                           | Relevant Page Number | Relevant Code Number / Graphic              | Homes England's Response  | Recommendation                                       |
|--------------------------------------|----------------------|---|---|--|
| Chapter 4: Code - Section 3 - Nature |                      |   |   |  |
| 4.3.1                                | Page 41              | Landscape Character & Landholdings: Text    | These paragraphs use “must”, but are not labelled as specific codes. As these are narrative text describing the vision and intended approach, we'd suggest the document would be more legible and avoid potential misunderstandings if areas, like this, providing descriptive guidance avoid the use of words "must" and "should". This text is useful in setting the scene for the chapter.   | Remove “must” from narrative text                    |
| 4.3.2                                | Page 41              | Landscape Character & Landholdings: Graphic | Unfortunately, we cannot read or understand this diagram. Is this diagram work in progress? Is it a repeat of the prior Land Ownership Diagrams?  | Update Graphic                                       |
| 4.3.3                                | Page 42              | NA.01                                       | <p>While we are generally supportive of the aspiration, we have concerns around this being a list of existing landscape features (analysis) and the use of the word 'must' here given the level of prescription this implies within the code. We'd suggest this may be better outlined in the analysis section or as descriptive guidance then supported by more nuanced codes.</p> <p>We raise this concern as while we are trying to work with the existing landscape character as much as possible in some instances hedgerows and trees will require removal to facilitate the development, as there are a number of things to balance. This amendment will help ensure the Code does not impede successful delivery of the SW Rugby allocation.</p>  | Remove code and replace with nuanced “should” codes. |
| 4.3.4                                | Page 42              | NA.02                                       | <p>While we are generally supportive of the aspiration, we are very concerned by the wording and level of prescription of "All landscape features must be retained...", implies. This is overly prescriptive given the complexity and scale of the development.</p> <p>While we are supportive of the principle of retaining the key landscape features within the site, it may not be possible to retain all landscape features in their entirety given the proposed development (the allocation) and the infrastructure required. Figure 2 of the adopted SPD demonstrates this point as it does not retain all existing landscape features / shows breaks will be required in hedgerows.</p> <p>We feel the wording and clarity of this code (and the entire section) needs to be reviewed to ensure it has the flexibility to support the long-term delivery of the allocation. Our view is that references to "must" like this need to be changed to "should."</p> <p>In addition, it is not clear within this section what is to be retained. Over the course of the past year, Homes England and their design team have been very clear at Pre-Application Meetings and Design Review Panels, that given the extent of hedgerows within the site, these cannot all be retained if we are going to deliver a connected, viable, deliverable development across this allocation.</p> | Amend code   |



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| Comment ID | Relevant Page Number | Relevant Code Number / Graphic       | Homes England's Response  | Recommendation   |
|------------|----------------------|--------------------------------------|---|--|
| 4.3.5      | Page 42              | NA.04                                | This code needs to be balanced against highways, movement and access considerations. We'd therefore suggest this is amended to a should.  | Amend from "must" to "should"                              |
| 4.3.6      | Page 42              | Landscape Character: Graphic         | <p>The Graphic provides a site analysis and therefore does not relate to the codes on the page. We are also concerned that this is based on the existing situation and does not currently take account of how the landscape will be transformed by the approved proposals for the other developments proposed within the allocation.</p> <p>We'd suggest that as a minimum the approved HLR proposals are taken account of as well as the other strategic infrastructure outlined by the adopted SPD as these will impact the future landscape character and are fundamental to the delivery of the allocation.</p> | Amend Graphic  |
| 4.3.7      | Page 43              | Existing Landscape Features: Graphic | Unfortunately, we cannot read or understand this diagram. Is this diagram work in progress? Is it a repeat of the prior Land Ownership Diagrams?  | Update Graphic   |
| 4.3.8      | Page 43              | NA.09, NA.10 & NA.11                 | <p>We find the overlaps between existing, proposed, and management confusing. One thing that we think would be helpful is to cover management in a separate section.</p> <p>For NA.11 we suggest the use of Ecological Impact Assessment (EIA) rather than Preliminary Ecological Appraisal (PEA) Report. The EIA constitutes an EIA plus additional surveys plus mitigation.</p>   | Update Page 43   |
| 4.3.9      | Page 43              | NA.12                                | <p>While we are generally supportive of the aspiration, we are concerned by the lack of clarity around the reference to landscape features and blanket use of 'must' regarding buffers. It is not clear which landscape features are being referenced.</p> <p>It is our view that buffers should be covered in one place in the document to ensure clarity. As currently outlined within the code they are very prescriptive. See 4.3.5 below.</p>  | Update Code with further information on landscape features |
| 4.3.10     | Page 43              | NA.15                                | <p>This is very detailed and would result in assumptions being made within the wording as it generically references existing trees. Suggest revising this as follows:</p> <p>"Where high quality trees are impacted by nearby development, opportunities to retain these trees through the use of landscape techniques such as root cell systems must be explored."</p>   | Update Code  |
| 4.3.11     | Page 43              | NA.16                                | These buffer strips are covered in other ways in other sections of the code. We are concerned by having overlapping codes spread out within the code as this may create confusion at future stages. See 4.3.5 below.  | Remove Code  |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response  | Recommendation                                       |
|------------|----------------------|--------------------------------|---|--|
| 4.3.12     | Page 43              | NA.17                          | <p>This is very detailed and prescriptive if applied to the entirety of the allocation. We also feel this is a design code about 'proposed hedges' and not an existing landscape feature which appears to be the theme of Page 43.</p> <p>Suggest 'proposals' are covered in a separate section and that a code like this is a 'should' to ensure an appropriate degree of flexibility is allowed for given there will be a variety of hedges across this allocation. For example, some of the hedges will be within residential development parcels and cannot be the diverse species mix being referenced here.</p> <p>If retained, hedgerows should be referred as "native".</p>   | Remove Code  |
| 4.3.13     | Page 43              | NA.19                          | <p>We suggest this is a proposal and the clarity of this section could be improved by grouping "the proposals" together.</p> <p>While we are generally supportive of the aspiration to align with drainage practices, this code only references 'micro-SUDS' and includes only a couple very specific examples of SuDS. A key part of our concern is that the ground conditions mean that these forms of SuDS may not always be possible.</p> <p>Therefore, the reference to "must" should be changed to "should" and we'd suggest this code needs to be drafted in a way that speaks more generally to SuDS and Drainage. Where specific examples are provided it is made extremely clear that these are just a couple examples of a much wider palette.</p> | Remove Code or Amend wording from "must" to "should" |
| 4.3.14     | Page 43              | NA.20                          | <p>We support the general aspiration and principle but given the overarching nature and large scale of the site we feel this is better coded as a 'should'.</p>   | Amend wording from "must" to "should"                |
| 4.3.15     | Page 44              | Buffers & Boundaries: Graphic  | <p>We struggled to review this diagram. We have assumed it is to be updated for the final version of the Design Codes.</p> <p>While we are generally supportive of the aspiration, regarding the inclusion of existing grassland we do not see a code related to this and nearly all of the existing grassland is situated in areas of proposed development within the Illustrative Framework Plan. This should be acknowledged in the text.</p>  | Amend Graphic  |



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| Comment ID | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response  | Recommendation       |
|------------|----------------------|--------------------------------|---|----------------------|
| 4.3.15     | Page 44              | NA.23 & NA.24                  | <p>Whilst we understand the intention of this code and are supportive of providing appropriate off sets from development to existing woodland areas, we have concerns about the proposed wording as this is written as a blanket code with no room for site specific responses which may have a direct impact on deliverability.</p> <p>We are unclear what you have defined as woodlands and how you have defined them. This is concerning given the significant buffer that is proposed as a mandatory requirement. We ask that the areas of ancient woodland are updated on the plans to reflect the Natural England Ancient Woodland inventory. The graphic shows trees along the restricted byway as ancient woodland, does not accord with the inventory. It also suggests the entirety of Cawston Woodland and Boat House Spinney Woodland is ancient which also contradicts with the Natural England Inventory.</p> <p>NA.23 and NA.24 both state that woodlands must have a 15m buffer and ancient woodland a 20m buffer. However, the SW Rugby SPD at para 9.5 notes that Natural England's standing advice requires a 15m buffer for ancient woodland. The design code is therefore at odds with the adopted SW Rugby SPD and the Code needs to be changed for consistency.</p> <p>As written, we would also like to highlight that the definition of 'buffered' is unclear. Is this intended to provide a gap between the woodland and development such as housing? Our concern is that the current wording could be interpreted to mean that landscape proposals could be delivered within this buffer which would result in a missed opportunity to deliver multi-functional green and blue infrastructure within this buffer such as SuDS features, drainage areas, new planting, informal pathways. There may also be some instances where there is a need for an infrastructure or utilities connection within the buffer area.</p> <p>We feel the buffer distance for woodland should be assessed on a case-by-case basis and this blanket code should be removed. We do, however, support the general principle that housing development is set back from areas of existing woodland to support their retention and enhancement.</p> | Remove or Amend Code |



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| Comment ID | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response  | Recommendation                        |
|------------|----------------------|--------------------------------|---|---------------------------------------|
| 4.3.16     | Page 44              | NA.24                          | <p>Whilst we understand the intention of this code, we have concerns about the proposed water body buffer as this is written as a blanket code with no room for site specific design responses or understanding of delivery challenges relating to the drainage of the site. As currently worded, this code would not allow the development to come forward and we'd suggest this is best dealt with via the various planning applications that will need to come forward across SW Rugby.</p> <p>We suggest removing the reference of a water body buffer as the site's drainage is very complex and there is a need for altering existing ditches and water bodies in places to make the site's drainage feasible and deliverable. In addition, there is a need for some types of development (e.g. enhancements to PROW, earthworks, etc) to occur along or in proximity to a number of these existing features. To support this comment, we'd note that this code does not align with the Framework plan within this code (e.g. there is development suggested around or very close to a number of existing water bodies / ditches).</p> <p>We are supportive of the principle of retaining existing hedgerows (although not all hedgerows will be able to be retained); however, we have a number of concerns related to this part of the code as drafted. First, there are areas of hedgerow that we will need to remove to enable the development to come forward. We need to ensure the code is written in a way that allows the flexibility for detailed conversations can be had on a case by case basis. Second, it is worth noting there are PROW which run directly adjacent to (and even within existing hedgerows) so we'd flag these would be within the suggested buffer. To resolve this, we'd suggest the reference to a specific measurement is removed and all references to buffers related to existing hedgerows are changed to a 'should' to support more site specific conversations on a case by case basis in the future.</p> <p>We'd also like to ensure this code clearly excludes proposed hedges. Proposed hedges will not always be able to have such an extensive buffer as some of them will be integrated within the development (e.g. as front garden boundary treatments, etc.).</p> | Remove or Amend Code                  |
| 4.3.17     | Page 44              | NA.27                          | We would request that this code is amended to provide some clarity. What is 'They' referring to? Suggest this is a 'should' as it is very detailed to make a mandatory requirement at this stage.   | Amend wording from "must" to "should" |
| 4.3.18     | Page 44              | NA.28                          | This is overly prescriptive and not clear what boundaries are being referred to. Suggest this needs to be removed and included as an aspiration.  | Remove Code                           |
| 4.3.19     | Page 44              | NA.29                          | We would request that further geographical information is included as it is not clear what part of the allocation is being referenced.  | Amend Code                            |
| 4.3.20     | Page 44              | NA.30                          | This is confusing as worded. Suggest this is reviewed or deleted as this seems to be a movement code and not a nature code as currently written.  | Remove Code                           |



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| Comment ID | Relevant Page Number | Relevant Code Number / Graphic                | Homes England's Response   | Recommendation                        |
|------------|----------------------|---|--|---------------------------------------|
| 4.3.21     | Page 45              | Landscape connectivity & strategy: Graphic(s) | In the case of both Graphics used on Page 44, we are concerned by the amount of detail and the lack of clarity with how this relates to the codes. Both are unclear in scale and legibility, it is also not clear on how it relates to the principles established by the Framework, and what principles it is trying to communicate. It would be beneficial for the user to include some narrative on the graphics and how to use in combination with the codes in this section. | Amend Graphics                        |
| 4.3.22     | Page 45              | NA.34   | Could this be worded in a more accessible way?   | Amend Code                            |
| 4.3.23     | Page 45              | NA.36   | It is not clear what boundary treatments are being referenced here. Please could additional information be provided within the wording of the code.  | Amend Code                            |
| 4.3.24     | Page 45              | NA.37   | We suggest this should be revised from a “must” to “should”. We agree with the ambitions of the code, but it still needs to be fully tested through development delivery.  | Amend wording from “must” to “should” |
| 4.3.25     | Page 45              | NA.39   | We suggest this should be revised from a “must” to “should”. We agree with the ambitions of the code, but SuDS still needs to be fully tested through development delivery as the ground conditions mean SuDS may not always be possible.  | Amend wording from “must” to “should” |
| 4.3.26     | Page 48              | NA.48   | We would request further wording is added to this could which considers routes within areas of woodland. A number of these may struggle to be accessible depending on how that is defined  | Amend Code                            |
| 4.3.27     | Page 48              | NA.50   | We suggest that the following is added as a precursor to the code:<br><br>“Across South West Rugby a...”   | Amend Code                            |
| 4.3.28     | Page 48              | NA.51   | We suggest this should be revised from a “must” to “should”. We agree with the ambitions of the code, but it still needs to be fully tested through development delivery. It may be better suited to state that “all habitats created for the purpose of wildlife benefit”.  | Amend wording from “must” to “should” |
| 4.3.29     | Page 48              | NA.54   | We suggest this is best picked up as a condition or aspiration at the RMA stage.   | Remove Code                           |
| 4.3.30     | Page 48              | NA.55   | We suggest this is best picked up as a condition or aspiration at the RMA stage.   | Remove Code                           |
| 4.3.31     | Page 48              | NA.56   | We suggest this is best picked up as a condition or aspiration at the RMA stage.   | Remove Code                           |
| 4.3.32     | Page 49              | NA.59   | We feel the wording of this code is confusing when read in combination with NA.57 and NA.58. It suggests that ‘favour’ equates to 20%. We would request that this is confirmed within the code.  | Amend Code                            |
| 4.3.33     | Page 49              | NA.64   | Whilst we understand the intention of the code, our suggestion is that reference to “non-native species aid species diversity” is removed as this would be controversial.  | Amend Code                            |
| 4.3.34     | Page 49              | NA.72   | We would request that this code is amended to include reference to maturity and maintenance. We suggest that the following is added to provide added context:<br><br>“As trees mature and overhang nearby routes, they should be able to be maintained to achieve tree canopy clearances of...” (Or Similar)   | Amend Code                            |



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| Comment ID | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response   | Recommendation                                   |
|------------|----------------------|--------------------------------|--|--|
| 4.3.35     | Page 50              | NA.73                          | <p>The current wording assumes hedgerows will only be along unlit routes and this code seems to imply boundaries and edges will be only within open spaces.</p> <p>This may not always be the case (e.g. the central bridleway connecting the schools or mixed use centre will need to be lit and is an open space with a number of different boundaries) and there could be boundaries within the proposed development parcels.</p> <p>Please also reword to read “species rich native hedgerow”.</p> | Amend Code                                       |
| 4.3.36     | Page 50              | NA.74                          | <p>We don't fully agree with this especially for such a large site as there will be situations that require various alternative boundary treatments, and we need the flexibility to consider management over the long term. In our view, this is a detail that should be discussed as a part pre-application engagement for future RMAs.</p> <p>Amend language to include “could” rather than “should”.</p>  | Remove or Amend wording from “should” to “could” |
| 4.3.37     | Page 50              | NA.75                          | <p>We do not feel there is a requirement to quantify the number of species within hedgerows, it is restrictive and would constrain development coming forward. We recommend the number is either removed or reduced and the wording of “must” is amended to “should”</p>   | Amend wording from “must” to “should”            |
| 4.3.38     | Page 50              | NA.76                          | <p>We recommend the number is either removed or reduced and the wording of “must” is amended to “should”</p>   | Amend wording from “must” to “should”            |



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| Comment ID                                 | Relevant Page Number | Relevant Code Number / Graphic                            | Homes England's Response  | Recommendation                                       |
|--|----------------------|---|---|--|
| Chapter 4: Code - Section 4 - Public Space |                      |   |   |  |
| 4.4.1                                      | Page 54              | PS.01 – PS.04   | It is considered that the content of these codes is repetitive from the movement section earlier in the document. Rather than repeating, could utilise cross reference and amend the text to be an introduction.<br>No mention of details on public space (benches, wayfinding etc) apart from the car focussed road network  | Amend or Remove code                                 |
| 4.4.2                                      | Page 55              | PS.05   | We aren't sure why there is a need for both the "urban" and "sub-urban" typologies for secondary streets. Could there be a bit more narrative around this as we currently assume the urban areas relates to areas around the mixed use centre, schools and areas around bus stops.<br><br>This also largely replicates highways guidance. We feel it would be more appropriately located within the Movement section of the document.<br><br>If the code is to be retained, it should be amended from "must" to "should" as there needs to be room for nuance and variation given the various site conditions and constraints. This should also apply to the bullet points stating "must" within the code.<br><br>We'd also note that the last bullet point of PS.05 is not consistent with PS.01. Suggest this bullet point should align with PS.01. | Remove Code or Amend wording from "must" to "should" |
| 4.4.3                                      | Page 55              | Secondary Streets: Graphic                                | We suggest that the dimensions are removed as these have the potential to create confusion if applied elsewhere. The dimensions also contradict other parts of the code (such as MO.57 widths for secondary streets)  | Amend Graphic  |
| 4.4.4                                      | Page 56              | PS.06   | Same comments as in 4.4.2 above.  | Remove Code or Amend wording from "must" to "should" |
| 4.4.5                                      | Page 56              | Secondary Streets: Graphic                                | We suggest that the dimensions are removed as these have the potential to create confusion if applied elsewhere. It would also be beneficial to include an illustrative bus stop.   | Amend Graphic  |
| 4.4.6                                      | Page 57              | Secondary Streets – Landscape general principles: Graphic | We suggest that the dimensions are removed from the graphic as these have the potential to create confusion if applied elsewhere.<br><br>The "pedestrian space 2" label within the key and feel it is not correct. Most of the indicated space would be an interface with the adjacent buildings and significant parts of it are likely to be defensible space, front gardens, or landscaping.  | Amend Graphic and Key                                |



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| Comment ID | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response  | Recommendation                                       |
|------------|----------------------|--------------------------------|---|--|
| 4.4.7      | Page 57              | PS.08                          | As per previous comments on buffers, we suggest this is removed or wording significantly revised. There are instances where this cannot be achieved, and we feel this needs to be reviewed on a case by case basis. An example is parts of Cawston Lane within Homes England's submitted planning application.        | Amend Code   |
| 4.4.8      | Page 57              | PS.09                          | As per previous comments, it will not always be possible to include a 10m buffer from all existing drainage features (e.g. existing ditches) if these were to be classed as "water bodies". We suggest this is removed.   | Amend or Remove Code                                 |
| 4.4.9      | Page 57              | PS.10                          | Not all trees are capable of being preserved due to the highway infrastructure required. Whilst trees will be retained where possible, not all can be. We request "must" is amended to "should".  | Amend wording from "must" to "should"                |
| 4.4.10     | Page 57              | PS.11                          | The mandatory nature of the code in combination with the detail at this stage of the project give us hesitancy. Could this text please be reviewed to the following:<br><br>"General best practice for the implementation of landscape must be followed at all times. This should include, but not be limited to...." | Amend Code   |
| 4.4.11     | Page 57              | PS.12                          | We generally agree with the principle but this again applies a blanket requirement to a very large site that will need a degree of nuance and flexibility to support its delivery and further engagement with stakeholder. We request "must" is amended to "should".  | Amend wording from "must" to "should"                |
| 4.4.12     | Page 57              | PS.13                          | "Mown" grass verges conflicts with other guidance in the document such as NA.88. Suggest this is removed or if retained can it be revised from "must" to "should"   | Remove Code or Amend wording from "must" to "should" |
| 4.4.13     | Page 57              | PS.16                          | We'd suggest this is reviewed and revised to "should" as again, this may need future discussion with highways.  | Remove Code or Amend wording from "must" to "should" |
| 4.4.14     | Page 58              | PS.18                          | We'd suggest this is reviewed and revised to "should" as again, this may need future discussion with highways. It also suggests that pedestrian permeability must be achieved through frequent road junctions, instead of considering the role of footpaths, greenways etc.   | Remove Code or Amend wording from "must" to "should" |
| 4.4.15     | Page 58              | PS.20                          | This replicates guidance set out in the Warwickshire Design Guide and sets out a car focussed approach. None of the public space items illustrated in the pictures relate to the coding. Suggest omitting this information.   | Amend Code   |
| 4.4.16     | Page 58              | PS.22                          | We feel that the wording of this code as written conflicts with other parts of the document. Either it needs to be removed or re-written including additional detail.   | Remove or Amend                                      |



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| Comment ID | Relevant Page Number | Relevant Code Number / Graphic                             | Homes England's Response  | Recommendation                                  |
|------------|----------------------|--|---|---|
| 4.4.17     | Page 59              | PS.24  | <p>The previous page refers to Tertiary Streets then the heading changes here to the more general street codes. Suggest this is reviewed for consistency.</p> <p>Bullet four relating to highway verges feels very weak in the context of all the other codes. Suggest this is amended from “could” to “should” if acceptable to the highways authority.</p> <p>Bullet nine relating to side street junctions does not include lower tiers of streets which could support alternative junction types. Advice would be to include a reference to secondary or tertiary streets.</p> <p>If the code is to be retained, it should be amended from “must” to “should” as there needs to be room for nuance and variation given the various site conditions, the site’s constraints and future discussion with highways. This should also apply to the bullet points stating “must” within the code.</p> | Amend Code and wording from “could” to “should” |
| 4.4.18     | Page 61              | PS.25  | <p>Bullet nine relating to side street junctions does not include lower tiers of streets which could support alternative junction types. Advice would be to include a reference to secondary or tertiary streets.</p> <p>If the code is to be retained, it should be amended from “must” to “should” as there needs to be room for nuance and variation given the various site conditions, the site’s constraints and future discussion with highways. This should also apply to the bullet points stating “must” within the code.</p>  | Amend wording from “must” to “should”           |
| 4.4.19     | Page 62              | PS.26 – PS.32  | Refer to response 4.4.7   | Amend wording from “must” to “should”           |
| 4.4.20     | Page 62              | PS.33  | <p>We recommend the following revision:</p> <p>“Within Tertiary Streets, small to medium trees should be used. Examples could include....”</p>  | Amend Code                                      |
| 4.4.21     | Page 62              | PS.34  | We suggest this code is further clarified as there are likely to be areas of open space without trees nearby to highway that may not require a root barrier system.   | Amend Code                                      |
| 4.4.22     | Page 62              | Tertiary Streets – Landscaping General Principles: Graphic | We have noticed that the diagrams included show very few on plot parking spaces for tertiary streets and without labels it is hard to pick up the key principles that RBC are aiming to communicate. We'd suggest at least one example needs to show more on plot parking and some labels are added.  | Amend Graphic                                   |



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| Comment ID | Relevant Page Number | Relevant Code Number / Graphic         | Homes England's Response  | Recommendation                        |
|------------|----------------------|--|---|---------------------------------------|
| 4.4.23     | Page 63              | PS.35 – PS.38                          | <p>We suggest these codes are amended from “must” to “should” so they can be worked through in detail as a part of future RMAs.</p> <p>PS.36 - could you please clarify why private drives are recommended for 5.5m wide but Tertiary Streets T2 only 5.0m. We'd suggest both are aligned to 5m for consistency.</p>  | Amend wording from “must” to “should” |
| 4.4.24     | Page 63              | PS.42, PS.43                           | Duplication of content within the Movement section, we would request that these are signposted too to avoid confusion by the user.  | Remove Code                           |
| 4.4.25     | Page 63              | PS.44, PS.45                           | <p>There is no indication of where these routes would be located. The wording of these codes and their suggestion of dedicated cycle provision in all of these routes may impact deliverability. Dedicated spaces for cyclist cannot be a blanket mandatory requirement.</p> <p>Active only routes should be provided to ensure good levels of connectivity across the allocation and promote walking and cycling.</p>          | Amend Code                            |
| 4.4.26     | Page 64              | PS.47                                  | We support the retention of existing hedgerows where possible, but this cannot be a blanket mandatory requirement as this suggests. Please remove or revise to be aspirational (could).   | Remove Code                           |
| 4.4.27     | Page 64              | PS.48 – PS.50                          | We have concerns around these blanket codes as they are very prescriptive and give no room for nuance discussions around the various factors that will be needed to be balanced to deliver the allocation. In short, these codes give no room for case by case discussions to be worked through as designs are developed and weigh up the various considerations that will need to be balanced to support deliverable solutions | Remove Code                           |
| 4.4.28     | Page 65              | Street types for other uses: Text      | We'd suggest that Potsford Dam Link and Streets for Employment are important and significant streets. Given this, we feel their role within the street hierarchy should be clearer as currently drafted the order of this section and their inclusion on this page implies they are strategic streets.  | Amend text                            |
| 4.4.29     | Page 65              | PS.58                                  | Given PS.62 is a must, we suggest this code is reviewed for consistency.  | Amend wording from “must” to “should” |
| 4.4.30     | Page 65              | PS.66                                  | No detail in this code on the necessity for these types of facilities. We recommend that this is separated into two codes as currently, it reads and mixes “must” and “should”.   | Amend Code                            |
| 4.4.31     | Page 66              | Hard Landscape Materials Palette: Text | <p>We request some introductory text is included giving a brief introduction and description of the table.</p> <p>Inclusion of “crossings” to “junctions”</p>   | Amend Text                            |
| 4.4.32     | Page 67              | Hard Landscape Materials Palette: Text | We request some introductory text is included giving a brief introduction and description of the table.   | Amend Text                            |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID                               | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response   | Recommendation                        |
|--|----------------------|--------------------------------|--|---------------------------------------|
| Chapter 4: Code - Section 5 - Built Form |                      |                                |  |                                       |
| 4.5.1                                    | Page 69              | Introduction: Text             | <p>The suggestion of overriding information runs the risk of creating confusion.</p> <p>Could this be better stated and focused around that each section adds an additional layer of information or detail that complements and provides added 'site specific' guidance.</p>   | Amend Text                            |
| 4.5.2                                    | Page 70              | BF.05                          | <p>Appreciate the wording here supports some flexibility; however, we need to highlight this will not be possible everywhere as orientation and built form also needs to take into account a whole host of factors (for example BF 12 - 14 on the following page). We'd suggest this is moved to the following page to be read with BF 12 - BF 14 as that would support added clarity on the balance of factors that need to be weighed up.</p>  | Remove Code                           |
| 4.5.3                                    | Page 70              | Built Form: Introduction       | <p>Appears to be missing a graphic, will this be added later for consultation?</p>   | Amend Graphic                         |
| 4.5.4                                    | Page 71              | BF.15 – BF.17                  | <p>We agree with the principles but suggest the codes should be revised from “must” to “should” as there may be instances where this is not fully achievable. We acknowledge that the list of acceptable 'terminations' is extensive so applies to most matters.</p> <p>BF.17, we would request this is amended to:<br/>Long building frontages must be visually broken down so as not to appear as one large mass. This can be achieved with stepped footprints, changes in height and façade or fenestration detail.</p>   | Amend wording from “must” to “should” |
| 4.5.5                                    | Page 72              | Residential Density: Graphic   | <p>See framework plan mark-ups</p>   | Amend Graphic                         |
| 4.5.6                                    | Page 73              | BF.25                          | <p>We suggest this code is strengthened to a must to ensure coordination across boundaries.</p>  | Amend Code                            |
| 4.5.7                                    | Page 73              | Building Heights: Graphics     | <p>Please refer to the appended framework plan mark-ups referencing page 73 of the design codes.</p> <p>We are concerned by the plans for the safeguarded land taller building heights next to residential development on Homes England's and U&amp;C's land to the east. This will not support a cohesive transition in scale and massing between residential development and employment. The graphic also suggests that development can be situated close to the boundary of the safeguarded land without due consideration of visual impact on the residential areas, structural landscape planting, existing public rights of way, or protection and enhancement of existing hedgerows and associated habitats.</p> <p>Lower heights next to Homes England's housing needs to be a clear principle with appropriate set backs in the safeguarded land ensured to mitigate potential environmental and visual impacts of employment land.</p> | Amend or Remove Code                  |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID | Relevant Page Number | Relevant Code Number / Graphic   | Homes England's Response   | Recommendation |
|------------|----------------------|----------------------------------|--|----------------|
| 4.5.8      | Page 74              | Residential Area Types: Graphics | See framework plan mark-ups  | Amend Graphic  |
| 4.5.9      | Page 75              | District Centre: Text            | <p>Appreciate this term aligns with the SPD, however we'd note the draft code sometimes uses District Centre and sometimes uses Local Centre.</p> <p>Our preference would be that Mixed Use Centre is used if possible.</p>  | Amend Text     |
| 4.5.10     | Page 75              | BF.29                            | <p>Dwelling typologies: Predominantly apartments or maisonettes within mixed use buildings. Suggest remove reference to mews – the secondary typology is a terraced house / town house. Ideally three storeys.</p> <p>Building Height: Additional height (in the form of a 5th storey, prominent roof forms or overall taller built form) to be limited to locations where it will contribute to placemaking aims, ie form key gateways, mark important corners or mark key public spaces.</p> <p>Building Line: We would request that the quantification is removed from the table as we have concerns over how specific these numbers are and how they would be interpreted. If a number is required, we think this needs to be expanded as there is variation in the road alignment that needs to be accounted for within the setback. Any reference to numbers should be clearly indicated as an aspiration. Suggest 'Minimal to no setbacks' is removed. Setbacks should be considered for Dunkleys Yard for example to stitch into the scale of the retained farm building and to help get light into the public space.</p> <p>Boundary Treatments: We would request this is removed or at least revise to ensure it is clear that this is in reference to Front Boundary Treatments to avoid conflict with the earlier codes within the Nature Section. If amended, it should reference the opportunity for non-residential uses to spill out into the public realm with no boundary treatment.</p> <p>Roof Form: Suggested amended text:<br/> "Cohesive to primary elevations and from key views to support a shared sense of place. Desire for a consistent overall approach with variations focused on contributing to the placemaking aims and adding interest to the built form in key locations."</p> | Amend Code     |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID | Relevant Page Number | Relevant Code Number / Graphic               | Homes England's Response  | Recommendation |
|------------|----------------------|--|---|----------------|
| 4.5.11     | Page 76              | BF.30  | <p><b>Building Height:</b> We request the inclusion of the following text:<br/>           "... to be concentrated toward the Mixed Use Centre, the strategic street network, and to highlight key corners or entrances."</p> <p><b>Building Line:</b> We would request that the quantification is removed from the table as we have concerns over how specific these numbers are and how they would be interpreted. If a number is required, we think this needs to be expanded as there is variation in the road alignment that needs to be accounted for within the setback. Any reference to numbers should be clearly indicated as an aspiration. We suggest the following:<br/>           "limited set backs with proposed setbacks used to respond to areas of existing landscape, and provide variety or nuance in alignment with the Placemaking Aims."</p> <p><b>Boundary Treatments:</b> We would request this is removed or at least revise to ensure it is clear that this is in reference to Front Boundary Treatments to avoid conflict with the earlier codes within the Nature Section.</p> <p><b>Roof Form:</b> Suggested amended text:<br/>           "Mostly consistently, desire for a consistent overall approach with variations focused between recognisable groupings that contribute to the placemaking aims."</p> | Amend Code     |
| 4.5.12     | Page 77              | Bilton Parkland & Suburban Residential: Text | "Suburban Residential": Could a more place specific name be provided for this area? This could pick up on either Cawston Spinney, Windmill or alternatively reference a western location.   | Amend Text     |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response   | Recommendation |
|------------|----------------------|--------------------------------|--|----------------|
| 4.5.13     | Page 77              | BF.31                          | <p>Building Line: We would request that the quantification is removed from the table as we have concerns over how specific these numbers are and how they would be interpreted. If a number is required, we think this needs to be expanded as there is variation in the road alignment that needs to be accounted for within the setback. Any reference to numbers should be clearly indicated as an aspiration. We suggest the following:<br/>"Potential use of small to medium set back to allow variation between groupings or along frontages where appropriate."</p> <p>Boundary Treatments: We would request this is removed or at least revised to ensure it is clear that this is in reference to Front Boundary Treatments to avoid conflict with the earlier codes within the Nature section.</p> <p>Roof Form: Suggested amended text:<br/>"Mostly consistently, desire for a consistent overall approach with variations focused between recognisable groupings that contribute to the placemaking aims."</p> | Amend Code     |
| 4.5.14     | Page 77              | BF.32                          | <p>Building Line: We would request that the quantification is removed from the table as we have concerns over how specific these numbers are and how they would be interpreted. If a number is required, we think this needs to be expanded as there is variation in the road alignment that needs to be accounted for within the setback. Any reference to numbers should be clearly indicated as an aspiration. Suggested amends:<br/>"Potential use of small to medium set back to allow variation between groupings or along frontages where appropriate."</p> <p>Boundary Treatments: We would request this is removed or at least revise to ensure it is clear that this is in reference to Front Boundary Treatments to avoid conflict with the earlier codes within the Nature section.</p>  | Amend Code     |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID | Relevant Page Number | Relevant Code Number / Graphic          | Homes England's Response  | Recommendation |
|------------|----------------------|---|---|----------------|
| 4.5.15     | Page 78              | BF.33                                   | <p><b>Dwelling Typologies: Suggested Revision:</b><br/>           "Predominantly houses including short terraces, semi-detached houses, link-detached houses, and detached houses. Small apartment blocks along main routes, toward Homestead Link Road or within the interior of the site."</p> <p><b>Building Line:</b> We would request that the quantification is removed from the table as we have concerns over how specific these numbers are and how they would be interpreted. If a number is required, we think this needs to be expanded as there is variation in the road alignment that needs to be accounted for within the setback. Any reference to numbers should be clearly indicated as an aspiration. Suggested amends:<br/>           "Potential use of larger, more generous set back to allow for variation as appropriate."</p> <p><b>Boundary Treatments:</b> We would request this is removed or at least revise to ensure it is clear that this is in reference to Front Boundary Treatments to avoid conflict with the earlier codes within the Nature Section.</p> | Amend Code     |
| 4.5.16     | Page 79              | Frontages to key routes & site gateways | <p>See framework plan mark-ups</p> <p>'Special built form' – A building with a special treatment through height, articulation, change of material, colour and/or window arrangement. Marker buildings are used to identify key gateways, areas of public realm or to inform wayfinding within SW Rugby.</p>   | Amend Graphic  |
| 4.5.17     | Page 80              | Cawston Lane: Text                      | <p>We understand the intention of this code but feel this be more focused on the integration of existing homes and the proposed school. In our view those are the key factors in the character of this frontage.</p> <p>Reference to the school should be included in paragraph 2.</p>  | Amend Text     |
| 4.5.18     | Page 82              | Sustainable Transport Corridor:         | <p>We'd also like to raise that we do not understand why there is 3 gateways identified in the top diagram on this page as only 2 gateways are identified on the associated plan.</p> <p>See framework plan mark-ups</p>  | Amend Graphic  |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID | Relevant Page Number | Relevant Code Number / Graphic                     | Homes England's Response   | Recommendation |
|------------|----------------------|--|--|----------------|
| 4.5.19     | Page 84              | Sustainable Transport Corridor:                    | See framework plan mark-ups  | Amend Graphic  |
| 4.5.20     | Page 84              | Sustainable Transport Corridor: Scenario 2 Graphic | In the case where the Safeguard Land becomes employment, there should be a landscape edge provided on the employment site (safeguarded land) to ensure it creates a positive interface with the adjacent housing and mitigates all of its environmental impacts on its own land as previously requested by Homes England.  | Amend Graphic  |
| 4.5.21     | Page 85              | Edge – Homestead Link Road Edge: Text              | <p>Whilst we understand the intention of this code, it would be clearer if these codes focused more clearly on the consistent features and principles of these edges and let the other parts of this section pick up some of the variations (e.g. building height) you've noted. For us the breaking down by areas type and overlapping references are currently causing confusion when reading this for the first time.</p> <p>We don't agree with the use of the phrase 'villas in parkland' as it is likely to cause confusion. Please remove or reconsider given what is stated in the Urban Residential section of the code.</p>  | Amend Text     |
| 4.5.22     | Page 85              | BF.50  | <p>We suggest the table associated with the graphic is removed. It does not seem to be a code or general guidance and may lead to confusion as to why it's more developed than other graphics.</p> <p>If the table is retained, could the following be addressed:</p> <p>Parking: "Car parking should be located to the rear of buildings and screened from the building frontage where possible."</p> <p>Gaps between buildings: Please remove. We are concerned by references to specific distances especially as there will be gaps between buildings that will be larger than the state 2-4m. We feel this is difficult to code beyond setting out an aspiration for a degree of rhythm and order across the frontage.</p> <p>Boundary Treatments: Please remove.</p> <p>Roof Form: Please remove.</p> <p>In general, we request there is a consistency in the coding of the edges as currently the code varies in the level of detail and prescription being placed on some area types.</p> | Amend Graphic  |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response   | Recommendation |
|------------|----------------------|--------------------------------|--|----------------|
| 4.5.23     | Page 86              | Edge – Parkland<br>Edge: Text  | <p>We struggle to understand and follow why the edges have broken up by area type. For us it would be clearer if these codes focused more clearly on the consistent features and principles of these edges and let the other parts of this section pick up some of the variations (e.g. building height) you've noted. For us the breaking down by areas type and overlapping references are currently causing confusion when reading this for the first time.</p> <p>No codes appear to be drafted in relationship to the Bilton Parkland in the same way as the other areas below.</p>   | Amend Text     |
| 4.5.24     | Page 86              | BF.56                          | <p>We suggest the table associated with the graphic is removed. It does not seem to be a code or general guidance and may lead to confusion as to why it's more developed than other graphics.</p> <p>If the table is retained, could the following be addressed:</p> <p>Building Height: We disagree with the suggestion that no on-plot parking can be provided along the edges you've identified on your diagram on page 82. We feel this should be approached with more flexibility; but in short we think on-plot parking if done in a good way could be allowed around Bilton Open Space.</p> <p>Gaps between buildings: Please remove.</p> <p>Set Back: Please Remove</p> <p>Boundary Treatments: Please remove.</p> <p>Roof Form: Please remove.</p> | Amend Graphic  |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID | Relevant Page Number | Relevant Code Number / Graphic             | Homes England's Response  | Recommendation       |
|------------|----------------------|--|---|----------------------|
| 4.5.25     | Page 87              | BF.61                                      | <p>We suggest the table associated with the graphic is removed. It does not seem to be a code or general guidance and may lead to confusion as to why it's more developed than other graphics.</p> <p>If the table is retained, could the following be addressed:</p> <p>Building Height: Given the amount of existing mature landscaping, we feel up to 2.5 storeys is acceptable along Cawston Lane South.</p> <p>Gaps between buildings: Please remove.</p> <p>Set Back: Please Remove</p> <p>Boundary Treatments: Please remove.</p> <p>Roof Form: Please remove.</p> | Amend Graphic        |
| 4.5.26     | Page 88              | BF.66                                      | <p>Given the "title" of the code (HLR edge within Urban Residential Area type), we are unsure where this would be on the framework plan and this makes it difficult for us to comment on.</p> <p>We suggest the table associated with the graphic is removed. It does not seem to be a code or general guidance and may lead to confusion as to why it's more developed than other graphics.</p>  | Amend Graphic        |
| 4.5.27     | Page 88              | BF.67                                      | <p>It is not clear what is being coded here, please could this code be rewritten to better clarify. As drafted, we believe this area relates to Cock Robin Wood but that is not reference here at all. Another alternative idea could be the addition of a location map.</p>  | Amend Code           |
| 4.5.28     | Page 89              | Edge – Employment & Residential Edge: Text | <p>We feel this introductory paragraph needs to be further expanded on and enhanced especially the second sentence in relationship to Scenario 2.</p> <p>Page 89 is not clear as written as to which scenario is being referred too. Please could this be addressed.</p> <p>Please also refer to our comments on Scenario 2 in ref: 4.5.33</p>  | Amend Text           |
| 4.5.29     | Page 89              | BF.71                                      | <p>In Scenario 1, this is excessive for the potential residential areas to the north and places a series of additional constraints on Homes England. We suggest a code of this nature cannot be a mandatory requirement at this stage as it should be assessed in detail as a part of any future planning application.</p>  | Amend or Remove Code |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID | Relevant Page Number | Relevant Code Number / Graphic                             | Homes England's Response   | Recommendation                        |
|------------|----------------------|--|--|---------------------------------------|
| 4.5.30     | Page 89              | BF.74 – Far Right Diagram within Second Row of the Graphic | We raise that the general principle of this code could also be achieved with houses as there are a variety of variations to this series of diagrams.   | Amend Code                            |
| 4.5.31     | Page 89              | BF.75  | Could further clarification be added to this code. It was assumed that there would be no new employment buildings outside of those that exist. Have we misunderstood?  | Amend Code                            |
| 4.5.32     | Page 89              | BF.77  | Suggest this is revised to a “should” from “must”.<br><br>We agree this as an aspiration and that it should be avoided but with the scale of the employment buildings this may be unavoidable in all instances.  | Amend wording from “must” to “should” |
| 4.5.33     | Page 90              | Edge – Employment and Landscape Edge: Text                 | There must be greater protection between the employment edge and both Homes England's and U&C adjacent land. This should be given the same level of attention as Scenario 1 with graphic illustrations developed to further clarify the following statement on the previous page.<br><br>“At the interface between proposed dwellings and proposed employment buildings (safeguarded land scenario 2), proposed employment buildings will be expected to provide the design response”<br><br>In the case where the Safeguard Land becomes employment, there should be a landscape edge provided on the employment site (safeguarded land) to ensure it creates a positive interface with the adjacent housing and mitigates all of its environmental impacts on its own land as previously requested by Homes England. | Amend Text                            |
| 4.5.34     | Page 90              | BF.80 & BF.82  | In scenario 2, we suggest that it needs to be clear that the screening and landscape buffer measures will be placed on the proposed employment land (Safeguarded Land in Scenario 2) given the detrimental impact it could possibly have on Homes England's land.<br><br>We'd suggest this code may need to be strengthened by complementary codes as in our view the potential employment land should also mitigate noise and other potential environmental impacts on Homes England's land to the south.   | Amend Code                            |
| 4.5.35     | Page 91              | BF.85  | We consider that this would be better as a “must” rather than “should” as the selection of two from the list gives a good deal of flexibility.   | Amend wording from “should” to “must” |
| 4.5.36     | Page 93              | Self-Build & Custom-Build Housing: Text                    | There is a mixing of self and custom build housing within this text, therefore mixed use buildings could be included. These are not the same. We request that the introductory text is reviewed, and this is appropriately clarified across this page.<br><br>Could consider renaming the section “Community Heart”.   | Amend Text                            |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID                                      | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response  | Recommendation                        |
|---|----------------------|--------------------------------|---|---------------------------------------|
| 4.5.37  | Page 93              | BF.96 & BF.97                  | Suggest that a Design Code and Plot Passport for self-build / custom build plots will be too onerous and challenge delivery. A plot passport will give enough structure and guidance to ensure a cohesive approach to the design of a street or series of plots.  | Amend text                            |
| 4.5.38  | Page 94              | BF.101                         | Suggest this is amended to a "should" from "must" and include:<br><br>'Where possible' as there is likely to be an instances where this cannot be avoided (e.g. Cawston Lane, Community Spine Road) given the various factors that we are needing to way up."   | Amend wording from "must" to "should" |
| 4.5.38  | Page 94              | BF.103                         | We agree with the stepping back of upper floors, therefore please amend reference to setbacks on page 75 as there is currently a contradiction.   | Amend Text                            |
| 4.5.39  | Page 94              | BF.104                         | Inclusion of the following:<br><br>The Masterplan must ensure there is coherence between the design of the Mixed-Use Centre, Older People's Housing, Primary School and Community Sports Area to create a strong sense of place and a 'Community Heart' at the core of South West Rugby.  | Amend Text                            |
| Chapter 4: Code - Section 6 - Homes & Buildings |                      |                                |   |                                       |
| 4.6.1   | Page 96              | HB.01                          | Suggest the following amendment:<br><br>"Dual aspect homes must be prioritised. Where single aspect are proposed, detailed designs should demonstrate how good levels of ventilation, daylight and sun access will be provided to habitable spaces."<br><br>Would also be beneficial to make a reference to single aspect north facing homes to be avoided. | Amend Code                            |
| 4.6.2   | Page 96              | HB.02                          | We suggest the following amendment:<br><br>"All homes should be provided with private amenity space through the introduction of a garden space, patio, balcony or roof terrace."  | Amend Code                            |
| 4.6.3   | Page 96              | HB.03                          | Suggest this is amended to a "should" from "must" and include:<br><br>"Where possible..." (at the start)  | Amend wording from "must" to "should" |
| 4.6.4   | Page 96              | HB.04                          | Inclusion or reference to "apartments" and "maisonettes"  | Amend Code                            |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID                             | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response  | Recommendation                        |
|--|----------------------|--------------------------------|---|---------------------------------------|
| 4.6.5                                  | Page 96              | HB.05                          | Suggest this is amended to a “should” from “must”.<br><br>Amended text could include:<br>“Unless site constraints make it impossible, all dwellings, especially ground floor apartments, must have defensible space or privacy strip”   | Amend wording from “must” to “should” |
| Chapter 4: Code - Section 7 - Identity |                      |                                |   |                                       |
| 4.7.1                                  | Page 99              | ID.07                          | It feels this may be strengthened by expanding on the current code. Suggest the following is included:<br><br>"Proposals should develop a locally inspired materials palette. This should be inspired by the non-exhaustive materials palette opposite, which is intended to provide a starting point for further development." | Amend Code                            |
| 4.7.2                                  | Page 99              | Materials Palettes: Graphic    | We suggest that the palette and examples could be further expanded on to show accent materials. There are local Rugby examples using timber, white render, white painted brick work, and metal cladding that could all be helpful in adding a layer of nuance / diversity to the starting point established here.               | Amend Graphic                         |
| 4.7.3                                  | Page 100             | ID.14                          | We suggest this amended to a “should” as it isn’t possible to specify that unprescribed details must be included, the wording could also be amended too:<br><br>‘Architectural features add depth and character. Buildings lacking in detail and therefore identity are not acceptable and must be reconsidered.’               | Amend wording from “must” to “should” |
| 4.7.4                                  | Page 100             | ID.17                          | This code is overly focused and specific. We suggest this code should be something more general about elevational treatment emphasising entrances and ensuring their legibility within front elevations. For example, recessed entrances could be then used as one example of a good way to achieve this.                       | Amend Code                            |
| 4.7.5                                  | Page 100             | ID.19                          | This is overly contextual and difficult to prescribe and therefore would impact deliverability. Suggest this code is removed  | Remove Code                           |



# RBC Design Code SPD Consultation – Homes England Consultation Response – 10 March 2025

| Comment ID  | Relevant Page Number | Relevant Code Number / Graphic | Homes England's Response  | Recommendation  |
|---|----------------------|--------------------------------|---|-----------------|
| Appendix 1: Route and Streets: Landscape Preservation and Application |                      |                                |   |                 |
| 5.1   | N/A                  | Appendix 1: General            | <p>Whilst we understand the intention of the Appendix, we consider that it would needs extensive review and coordination with the rest of the Code and clarify given to the status of this appendix. Typically, we'd expect an appendix to provide supplementary information and not include 'musts' or 'shoulds'.</p> <p>In its current format it may restrict suitable development across the allocation given the level of detail that appears to be emerging. This will negatively impact the overall viability and delivery of development across the allocation and add a significant amount of complexity in terms of how compliance would be assessed over the lifetime of SW Rugby's long delivery period. The information seems to be very generic and not place specific.</p> <p>We strongly urge RBC to remove this appendix from the Code.</p> | Remove Appendix |



# Draft Rugby Borough Council Design Code SPD Consultation

Framework Masterplan Review - Appendix to Homes England's consultation response.



Homes  
England

10 MARCH 2025



# Introduction

This document is to be read in conjunction with Homes England's tabulated consultation response.

The markups in this appendix are intended to assist Rugby Borough Council in ensuring alignment in the graphical information included within the adopted South West Rugby SPD (December 2024); approved planning applications (Homestead Link Road); submitted and soon to be determined planning applications and pre-application discussions that have taken place with RBC, WCC and the Design Review Panel.



# Contents

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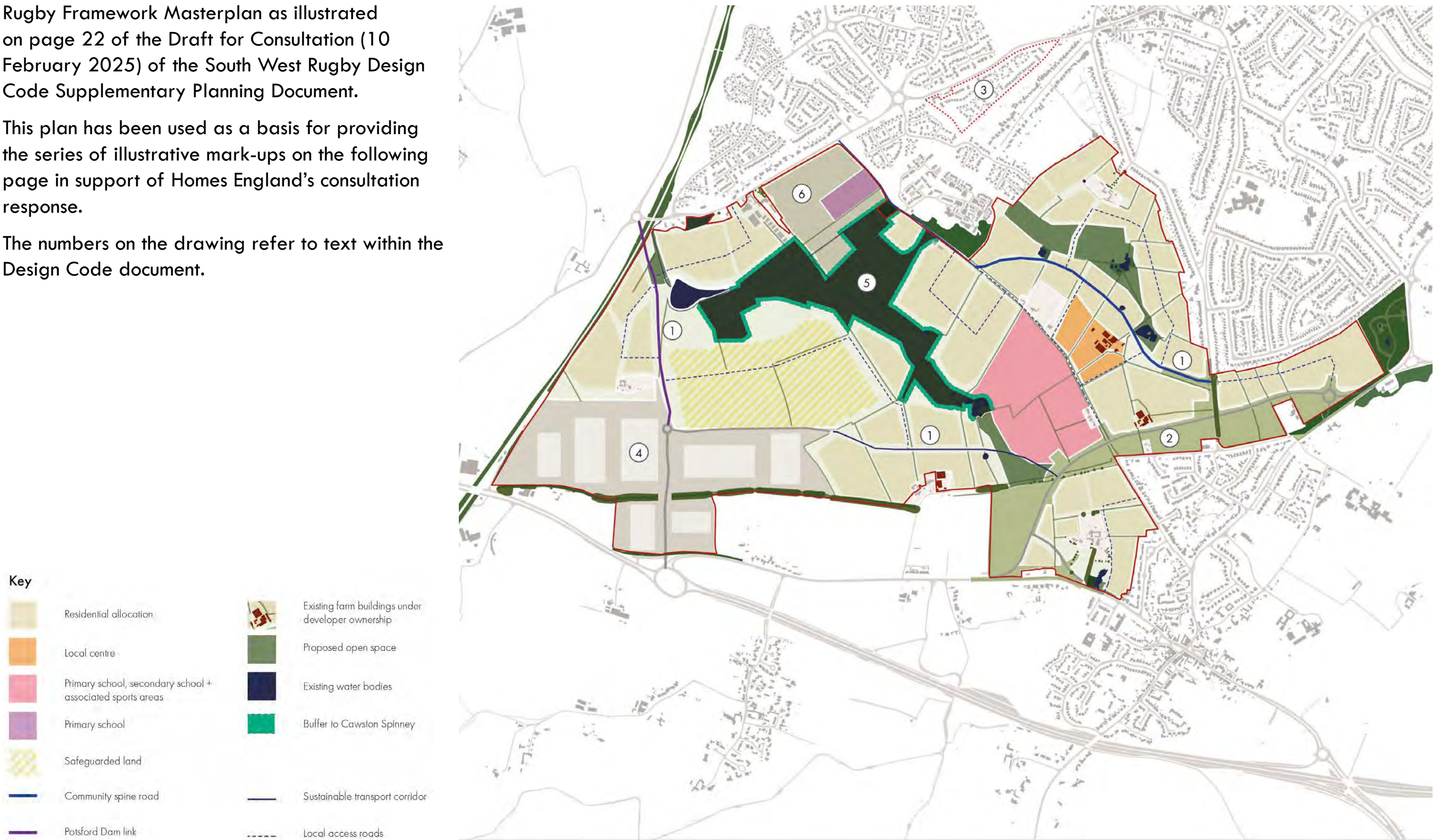
# Overview of SW Rugby Framework Masterplan

This page gives provides an extract of the SW Rugby Framework Masterplan as illustrated on page 22 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document.

This plan has been used as a basis for providing the series of illustrative mark-ups on the following page in support of Homes England’s consultation response.

The numbers on the drawing refer to text within the Design Code document.

Framework Masterplan from page 22 of the Consultation Draft Design Code



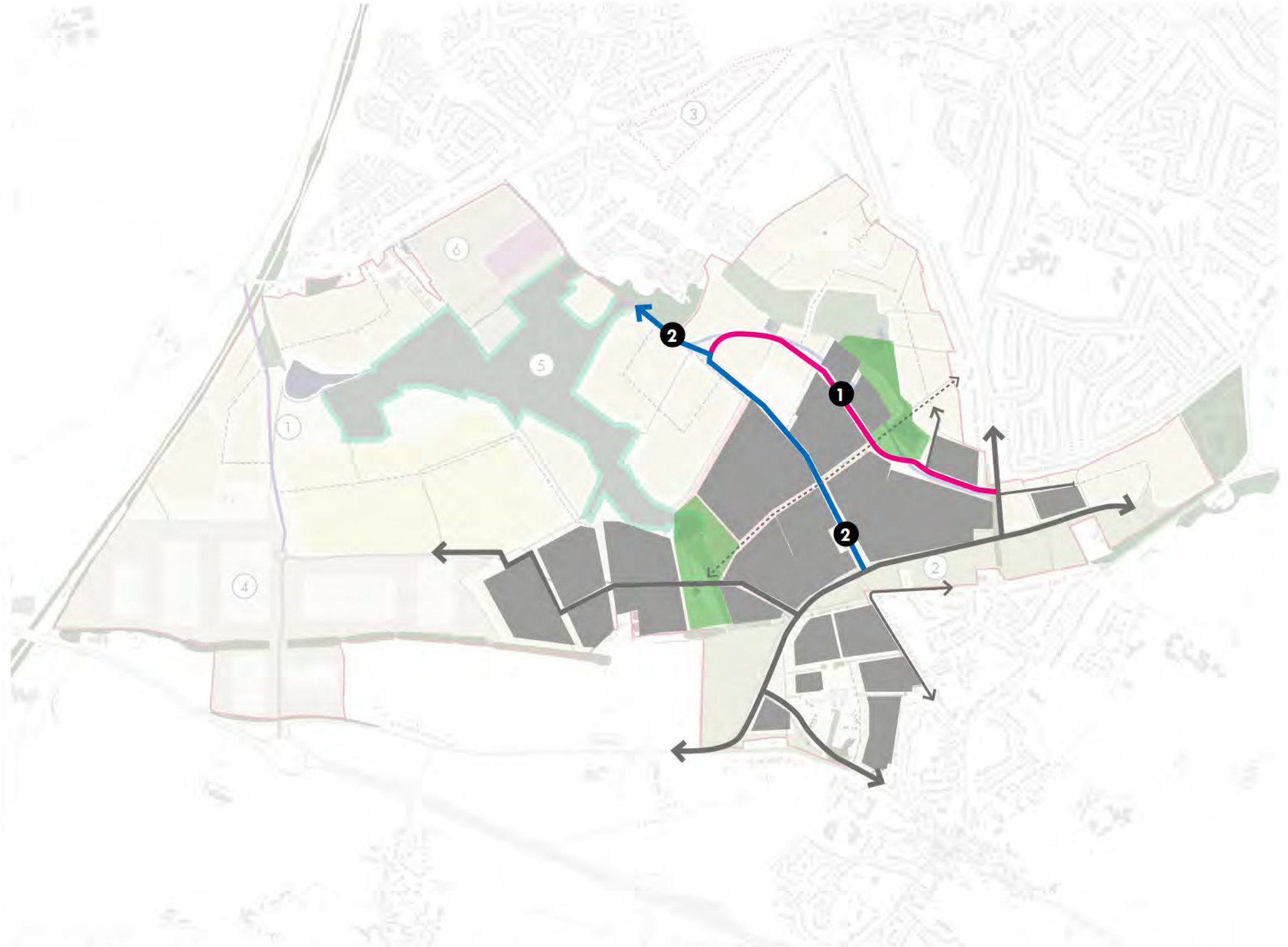


# Suggested Updates to Community Spine Road & Cawston Lane

- 1** **Alignment of Community Spine Road (Dunkleys Street) does not align with Homes England's Submitted Planning Application (R24/0733) throughout the Code.** Suggest the Framework Masterplan and its associated diagrams are updated to align with the submitted application.
- 2** **Alignment of Cawston Lane does not align with Homes England's Submitted Planning Application (R24/0733) throughout the Code.** Suggest the Framework Masterplan and its associated diagrams are updated to align with the submitted application. This should include indicating Cawston Lane as a main route.

## General Comment on the Relationship between the Community Spine Road and Cawston Lane and RBC's SW Rugby Draft Design Code.

As the Community Spine Road and Cawston Lane have been submitted as a detailed application, suggest it is made clear these will not be subject to this Design Code and these form a part of the baseline conditions the code is being developed upon.



Illustrative Mark-Up of Draft Framework Masterplan on Page 22 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document

|   |                              |   |  |   |                    |
|---|------------------------------|---|--|---|--------------------|
|  | Indicative development areas |  | Dunkleys Street (Community Spine Road) |  | Other road network |
|  | Indicative open space        |  | Cawston Lane                           |  | Central bridleway  |



# Suggested Updates to the Street Network Diagram (page 34)

In addition to amending the alignment of the Community Spine Road and Cawston Lane as noted above. We have the following suggestions in relationship to the street network diagram.

- 1 Suggest removing this street. We have concerns with how this is currently shown, it is most likely to be a lower tier street and will not provide a direct route to prevent rat running.
- 2 Suggest indicative route is revised as outlined on page 10 of this document.
- 3 Downgrade to a tertiary route. This is not proposed as a bus route. See further comments on pages 9 and 18 of this document.
- 4 Alignment of the Sustainable Transport Links should be updated to reflect Homes England's plans as discussed at pre-application meetings. See further comments on pages 49 and 52 of this document.
- 5 Suggest this is not shown as a connected route given it shows a potential "by-pass" of the bus gate of the Sustainable Transport Link. See further comments on page 56 of this document.
- 6 Please remove this section of Cawston Lane as it is not a continuous Street and will be stopped up as part of the Homestead Link Road approved scheme. This will be a pedestrian / cycle link only.
- 7 Suggest alignment of this street is discussed with Taylor Wimpey and aligned with the submitted planning application for the Community Spine Road (R24/0733).



Illustrative Mark-Up of Street Network Diagram on Page 34 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document

| Key      |                    | Proposed or existing upgraded |           |
|----------|--------------------|-------------------------------|-----------|
| Existing |                    |                               |           |
|          | Primary (motorway) |                               | Primary   |
|          | Primary            |                               | Secondary |
|          | Secondary          |                               | Tertiary  |
|          | Tertiary           |                               |           |



# Suggested updates to the Active Travel Diagram (page 35)

- 1** Suggest the existing Public Rights of Way is re-aligned to ensure coordination with the proposed re-alignment that was outlined within the approved Homestead Link Road Application.
- 2** Suggest the design code includes wording that supports minor diversions to existing Public Rights of Way.

This is suggested as the proposals for Homes England's land include a limited number of diversions that will be required to create safe crossing points and support the delivery of a viable masterplan. These diversions have been discussed at pre-application meetings with RBC and WCC. We'd like to ensure this diagram and the associated wording of the Code enables an appropriate degree of flexibility so the Active Travel Routes can be assessed on a case by case basis.



Illustrative Mark-Up of Active Travel Diagram on Page 35 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document

— Example locations where diversions to Public Rights of Way will be required to deliver infrastructure and/or development



## Suggested Updates to the Bus & HGV Route Diagram (page 36)

- 1 Suggest Draft Design Code and Framework Masterplan need to make clear there is a bus gate along the Sustainable Transport Link and there would be no HGV traffic within this section of the Sustainable Transport Link.
- 2 We disagree with this being indicated as a Bus and HGV route and suggest this route is removed.

Our view is the bus routes should be shown to travel along the Community Spine Road southwards towards Alwyn Road and rejoin the Homestead Link Road as per WCC's original requests and the Local Plan Assessment. This will be a one way bus route. We can share a plan and our further evidence for your review if required. It is also our view that no HGV traffic should be required on this street.

- 3** As a general comment Bus Routes and HGV Routes need to be separated as these are not the same.



Illustrative Mark-Up of Bus Routes and HGV Diagram on Page 36 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document



# Suggested Updates to the Mixed Use Centre Area

**1** Suggested amendment to the extent of the Mixed Use Centre

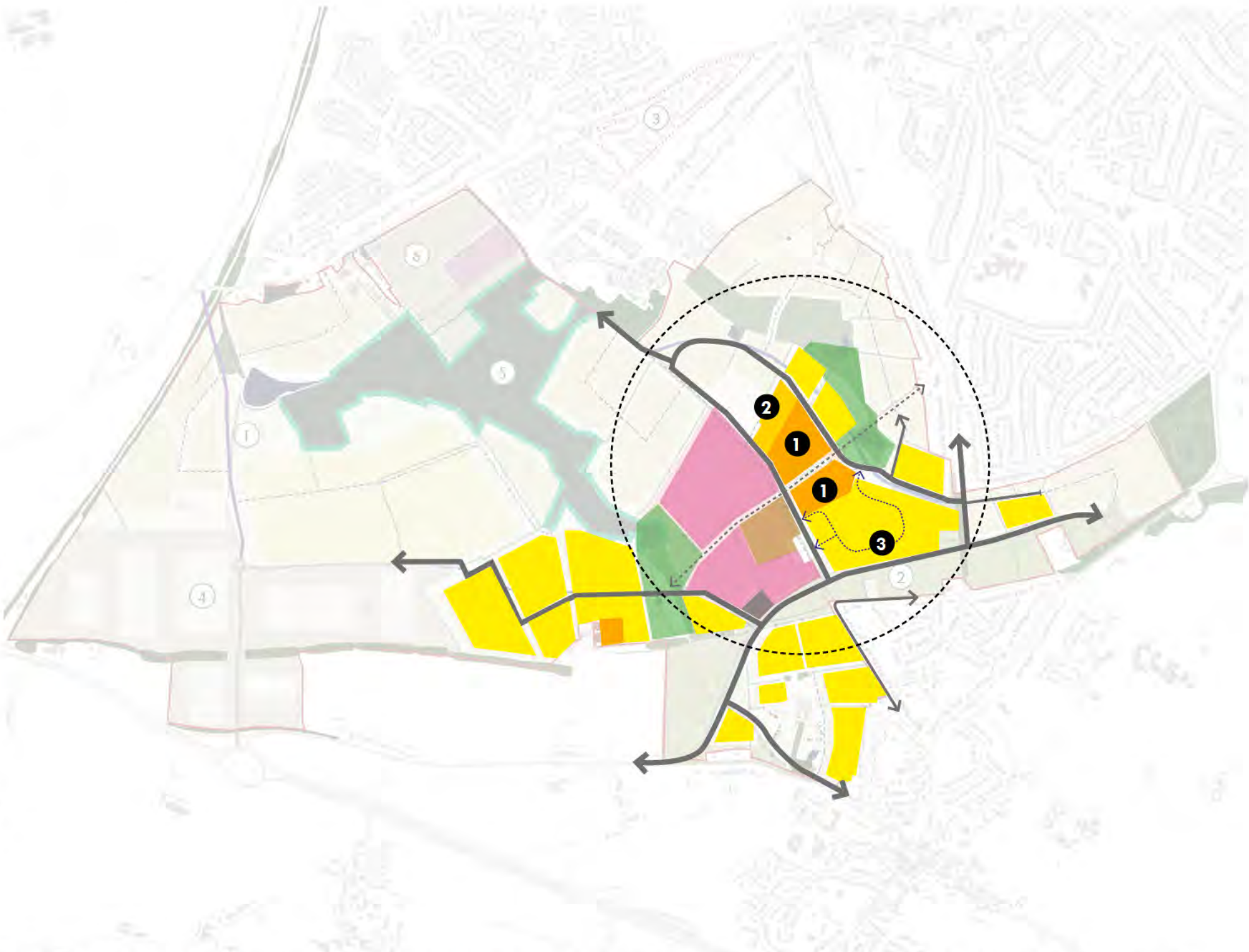
We note the plans within the Code are not consistent. We believe the Mixed Use Centre should form a cohesive zone between Cawston Lane and the Community Spine Road (Dunkleys Street) to align with Homes England’s proposals and supported by the Design Review Panel. The proposed extent of the centre should be expanded to the south on the Framework Plan. Please refer to our Draft Land Use Parameter Plan at the end of this document as a reference.

**2** Suggest amendment to interface with existing dwelling









The area north of the Mixed Use Centre is anticipated to come forward as residential development (Use Class C3 / C2) that is connected to the Mixed Use Centre. We are seeking for this to be higher density and are continuing to further explore the possibility for this to come forward as Older People’s Housing as indicated during our pre-application meetings. Please use our Draft Land Use Parameter Plan as a reference.

**3** Suggest the indicative Local Access Road to the south of the Mixed Use Centre is updated to broadly align with the mark-up.

This suggestion is being made so that the route aligns with the principles illustrated within Homes England’s emerging masterplan and the access points in the planning application for Community Spine Road & Cawston Lane. We are keen to stop this becoming a rat run and therefore feel a more convoluted route would be beneficial in transport terms.



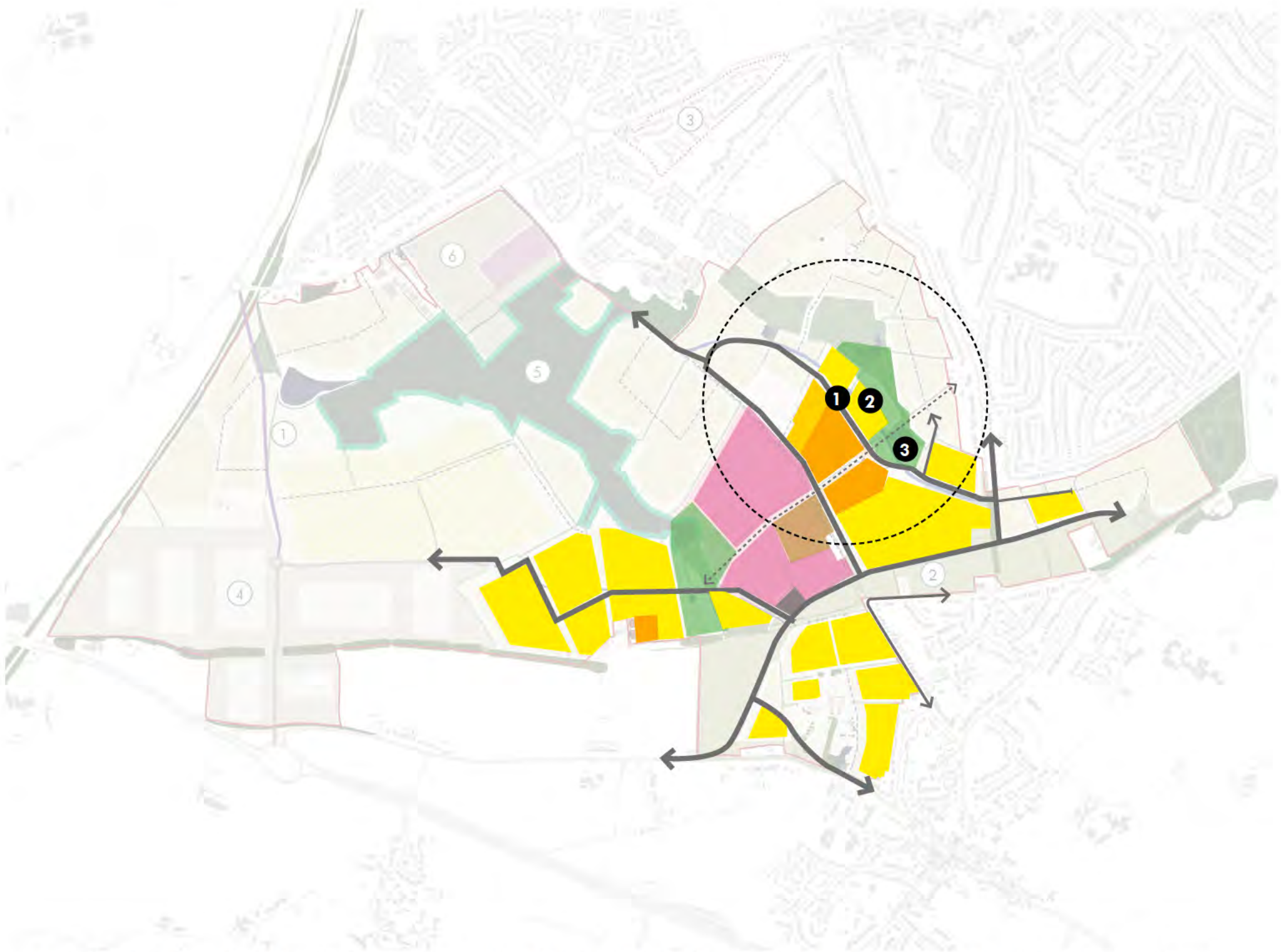
Illustrative Mark-Up of Draft Framework Masterplan on Page 22 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document

|   |  |   |                                     |   |                    |
|---|--|---|-------------------------------------|---|--------------------|
|  | Indicative development areas                         |  | Primary School                      |  | Other road network |
|  | Indicative open space                                |  | Substation                          |  | Central bridleway  |
|  | Secondary School including Community Use Sports Area |  | Mixed Use and Older People's Living |   |                    |



# Suggested Updates to the Edges of Bilton Open Space

- 1 Alignment of Community Spine Road (Dunkleys Street) should be updated as previously noted on page 46.
- 2 Amendment should be made to the development parcels adjacent to the Community Spine Road to bring them into better alignment with Homes England Land Use Parameter Plan.
- 3 Suggest adjusting Bilton Open Space in this location to better align it with the Community Spine Road's alignment. See submitted planning application (R24/0733) and Draft Land Use Parameter Plan at the end of this document for further reference.



Illustrative Mark-Up of Draft Framework Masterplan on Page 22 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document

|   |  |   |                                     |   |                    |
|---|--|---|-------------------------------------|---|--------------------|
|  | Indicative development areas                         |  | Primary School                      |  | Other road network |
|  | Indicative open space                                |  | Substation                          |  | Central bridleway  |
|  | Secondary School including Community Use Sports Area |  | Mixed Use and Older People's Living |  | Focus of comments  |

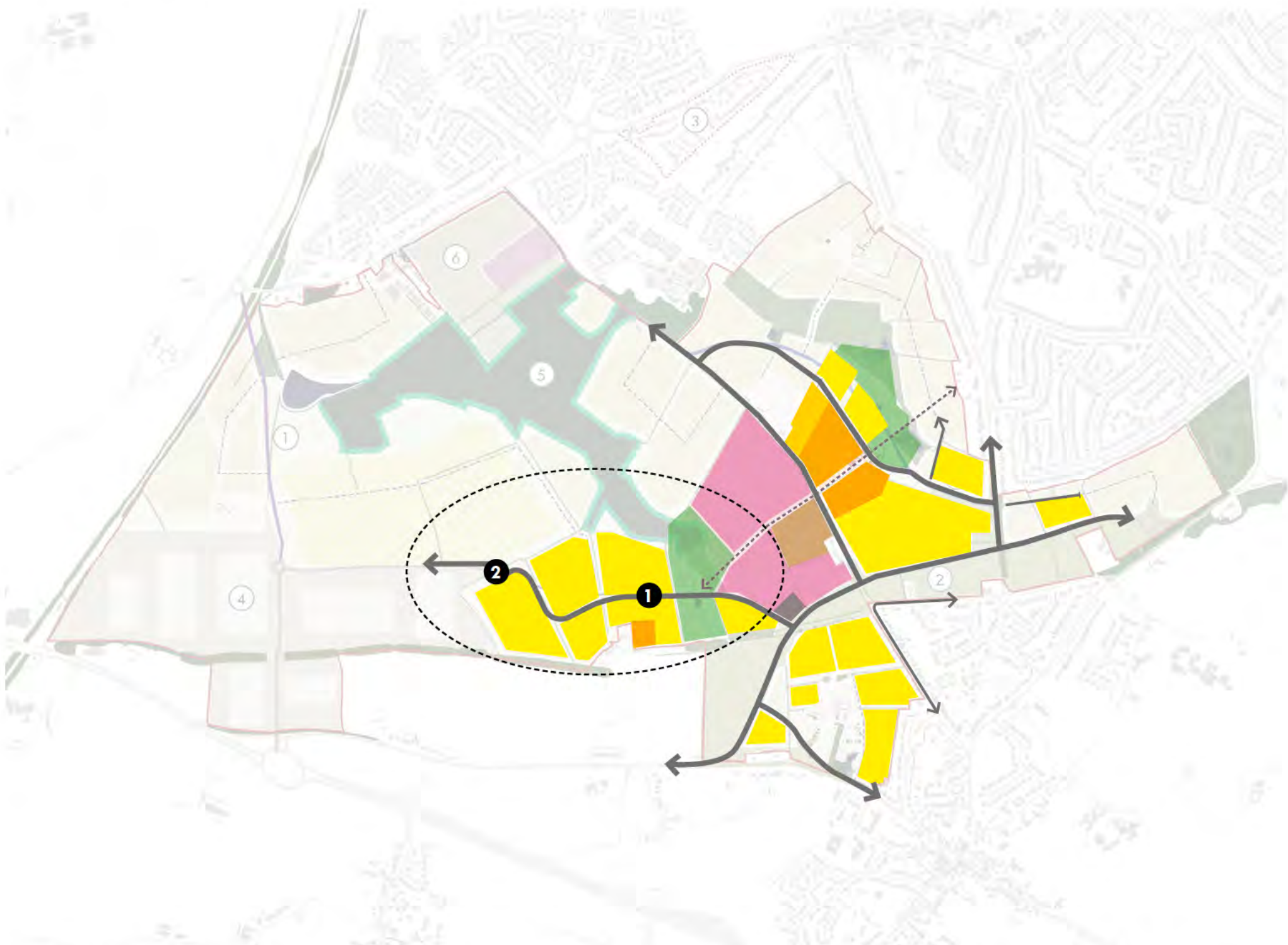


# Suggested Updates to the Sustainable Transport Link

- 1 Suggest the alignment of the Sustainable Transport Link (Windmill Street) is updated to align with Homes England emerging proposals and the access point established by Tritax’s approved application to the west.

Homes England’s proposed alignment includes a couple of bends in the road to support its alignment with Tritax and Homestead Link Road’s approved access points, facilitate the bus gate in accordance with guidance and minimise impact on the existing hedgerows as discussed in our pre application meetings with RBC and WCC in 2024.

- 2 Suggest the proposed location of the Bus Gate is identified.



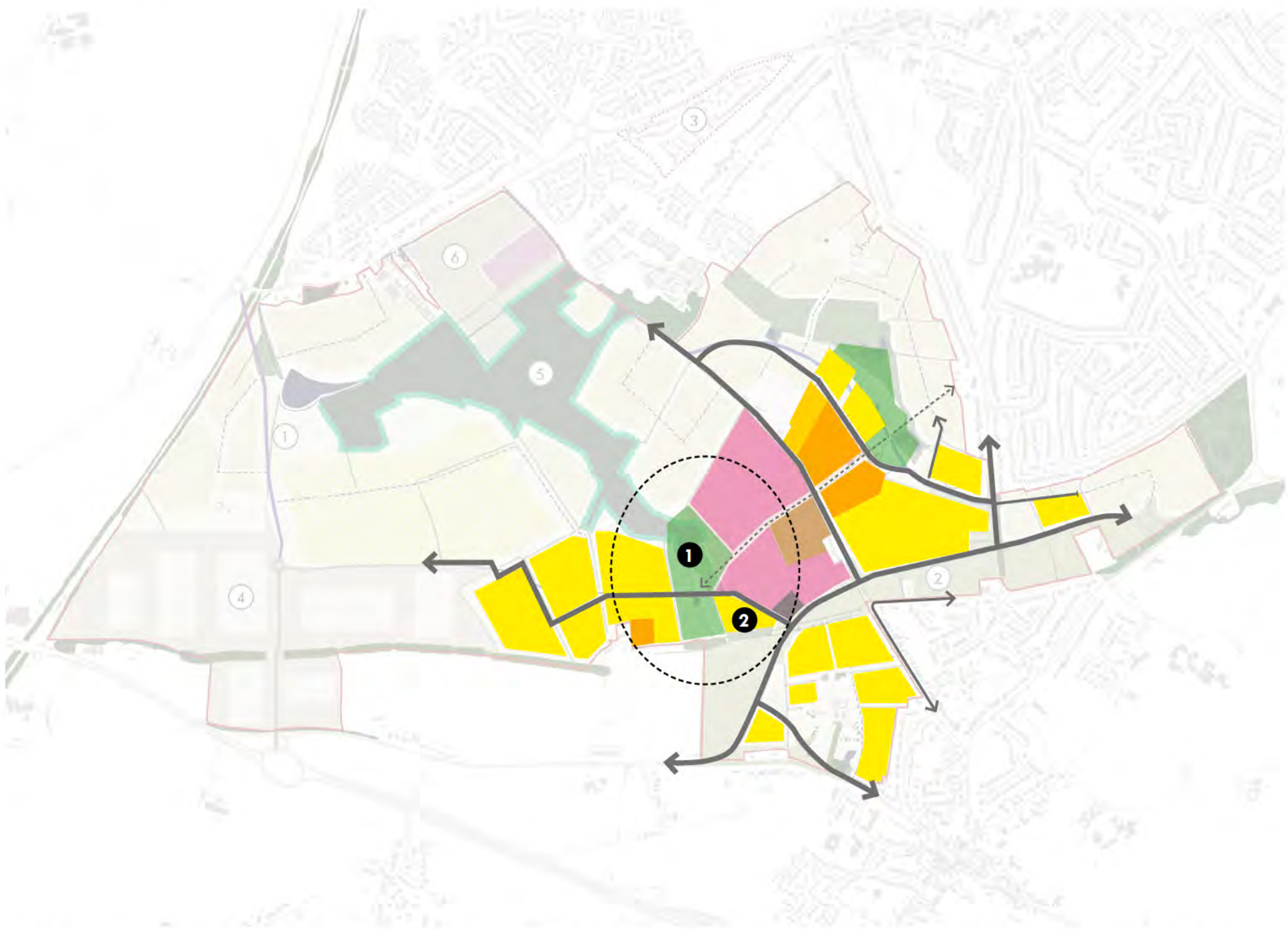
Illustrative Mark-Up of Draft Framework Masterplan on Page 22 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document





# Suggested Updates to the Green Infrastructure Alignment

- 1** Suggest the green infrastructure & open space connecting Cawston Spinney and Homestead Link Road should be adjusted and expanded to align with the retention of two existing hedgerows which have ecological importance and support the integration of the development parcel at the entrance from the Homestead Link Road which creates a gateway.
- 2** The triangle of land at the eastern end of the Sustainable Transport Link (Windmill Street) should be identified as a development parcel rather than open space.



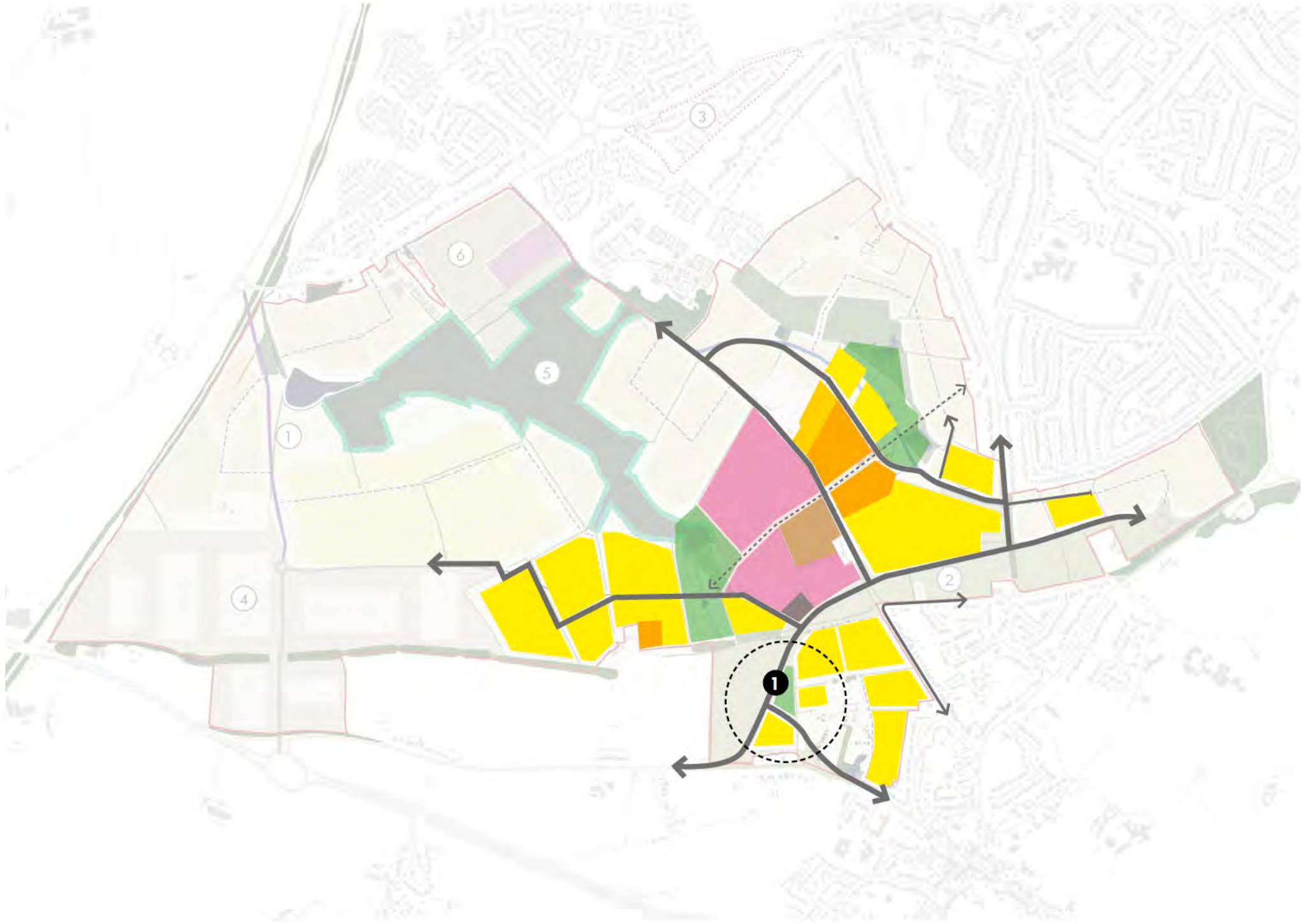
Illustrative Mark-Up of Draft Framework Masterplan on Page 22 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document






# Suggestion for Additional Open Space along Homestead Link Road

- 1 Suggest that the land highlighted in green on the adjacent markup between the Homestead Link Road and the development to the East should be updated to show it as open space.



Illustrative Mark-Up of Draft Framework Masterplan on Page 22 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document

|   |  |   |                                     |   |                    |
|---|--|---|-------------------------------------|---|--------------------|
|  | Indicative development areas                         |  | Primary School                      |  | Other road network |
|  | Indicative open space                                |  | Substation                          |  | Central bridleway  |
|  | Secondary School including Community Use Sports Area |  | Mixed Use and Older People's Living |  | Focus of comments  |



# Suggested Revisions to Homestead Link Road's Compound Areas

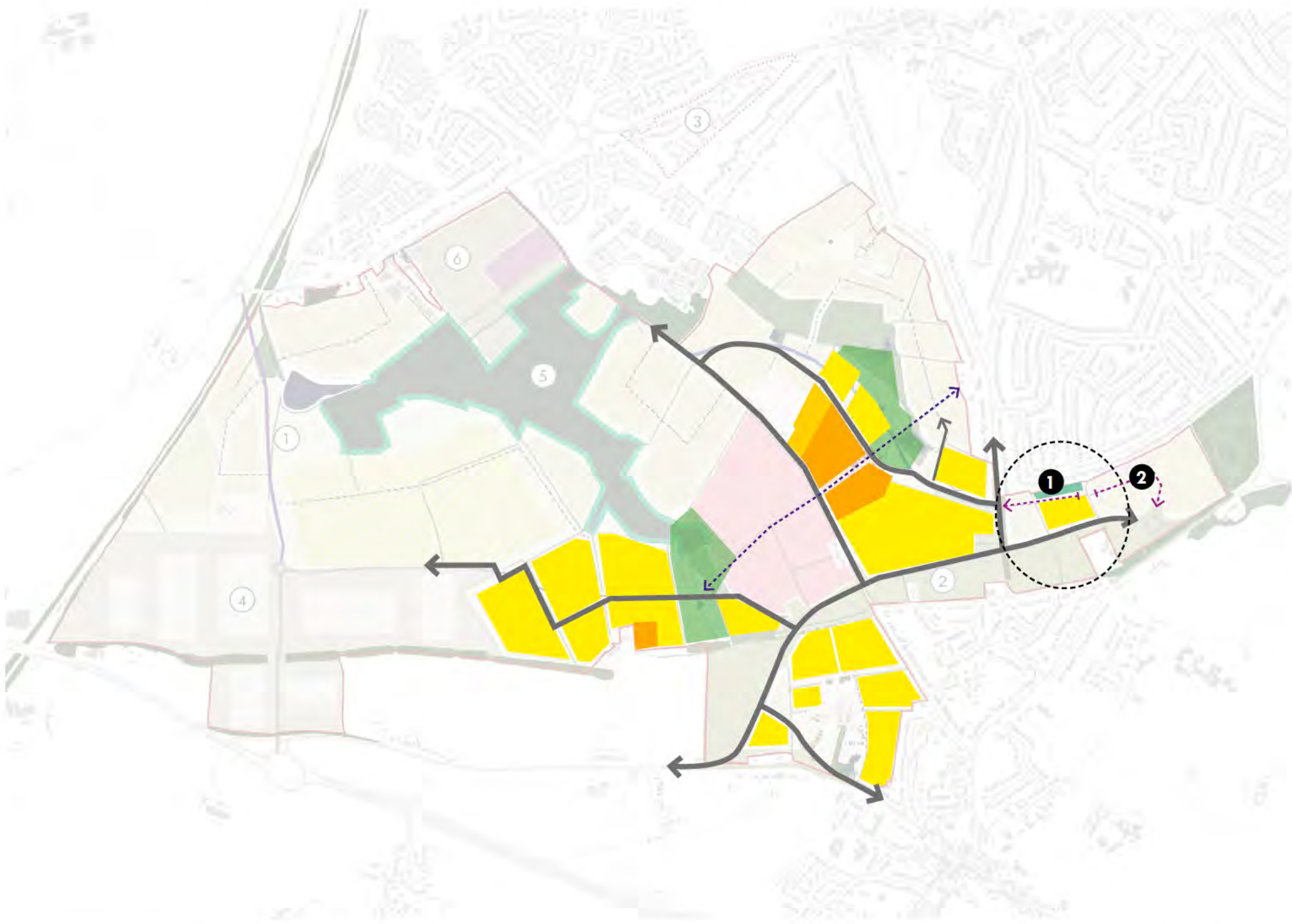
- 1** Suggest that compound areas that form a part of the Homestead Link Road's application to be removed from the permanent works extents on the Framework Masterplan. See notes on the adjacent mark-up for the anticipated use of each of the proposed areas.



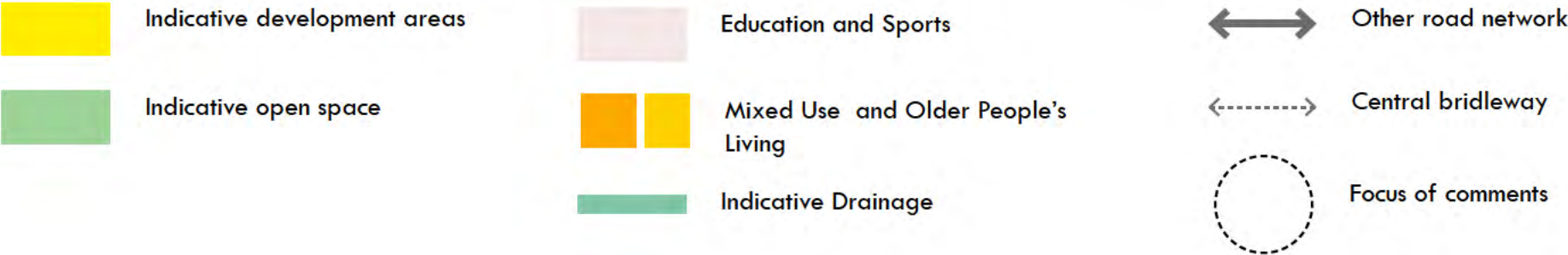


# Suggested Amendments to the Land East of Alwyn Road

- 1** For Homes England’s land to the east of Alwyn Road, we are currently proposing an open space and drainage along northern edge of the site boundary. We’d like to ensure that RBC’s SW Rugby Design Code SPD is developed in a way that supports the inclusion of landscape and attenuation areas between the Local Access Road and the existing residential properties of Montague Road as an appropriate design response. This is required due to existing flow rates and topography. Please see our Draft Land Use Parameter Plan at the end of this document for reference.
- 2** Suggest the Local Access Roads in this part of the allocation is not shown as being a connected vehicular route.



Illustrative Mark-Up of Draft Framework Masterplan on Page 22 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document



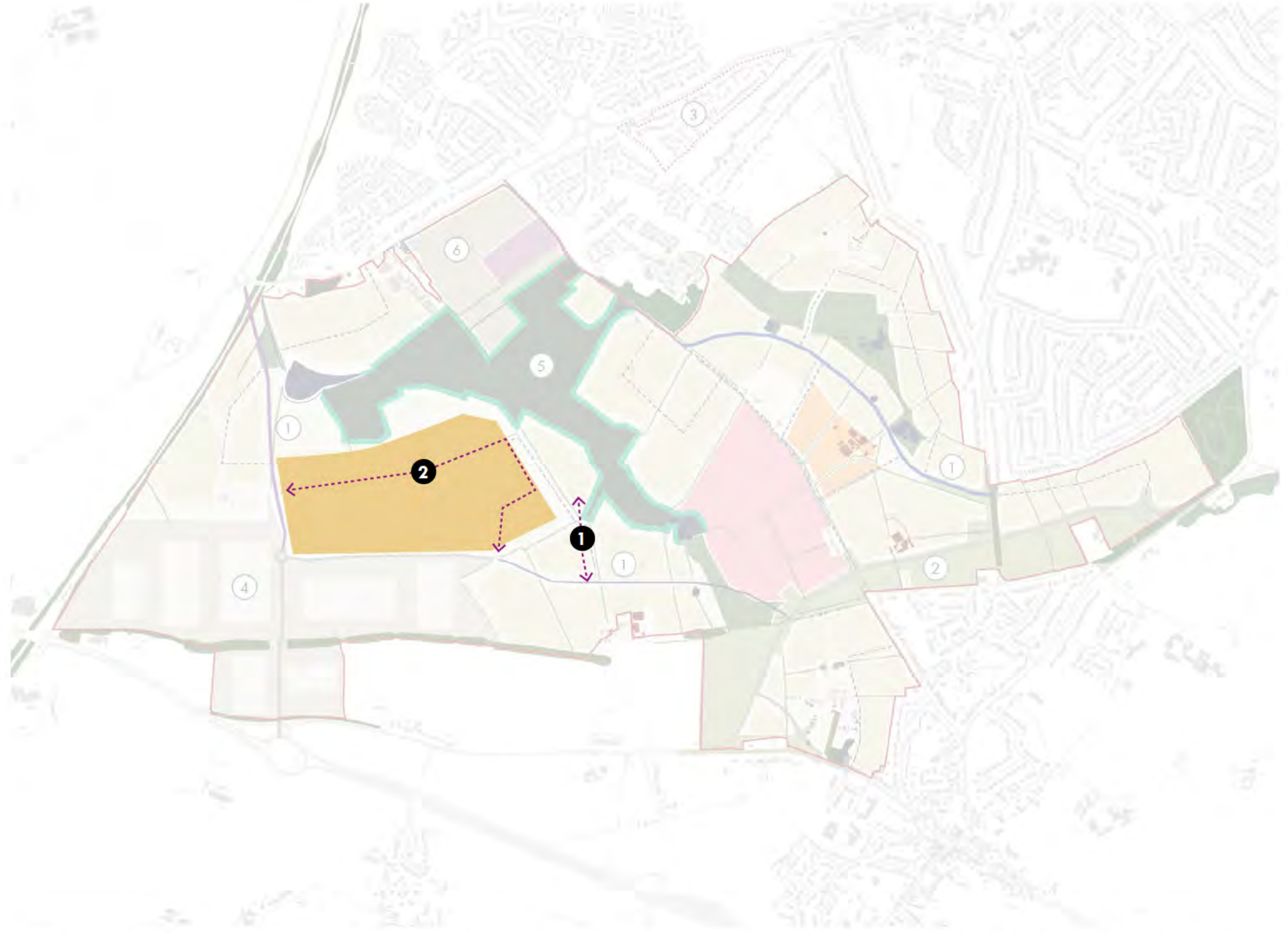


# Suggested Amendments to Local Access Road in the Safeguarded Land

- 1** Suggest the Framework Masterplan is aligned with Home England's emerging proposals by showing an illustrative vehicular connection to the residential parcel to the north that is not but not connected to the Safeguarded Land to the west.

We are very concerned by the fact that the Local Access Road appears to imply a vehicular link between the Safeguard Land and Homes England's land. We are concerned that if the safeguarded land becomes employment this road would undermine the allocation's current transport strategy and the bus gate on the Sustainable Transport Link.

- 2** Suggest amendments to the indicative access arrangements for the Safeguarded Land are made to address our comments above and access is provided from the west.



Illustrative Mark-Up of Draft Framework Masterplan on Page 22 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document

←-----→ Suggested amendment to vehicular routes



# Suggested Amendment to Buffer Along Cawston Spinney

- 1** Suggest the buffer to Cawston Spinney is removed or further clarified as indicative in regards to the Framework Masterplan. See our supporting written response to the Draft Design Code.
- 2** We note Cock Robin Wood has no buffer indicated within the Framework Masterplan despite this being a Local Wildlife Site.



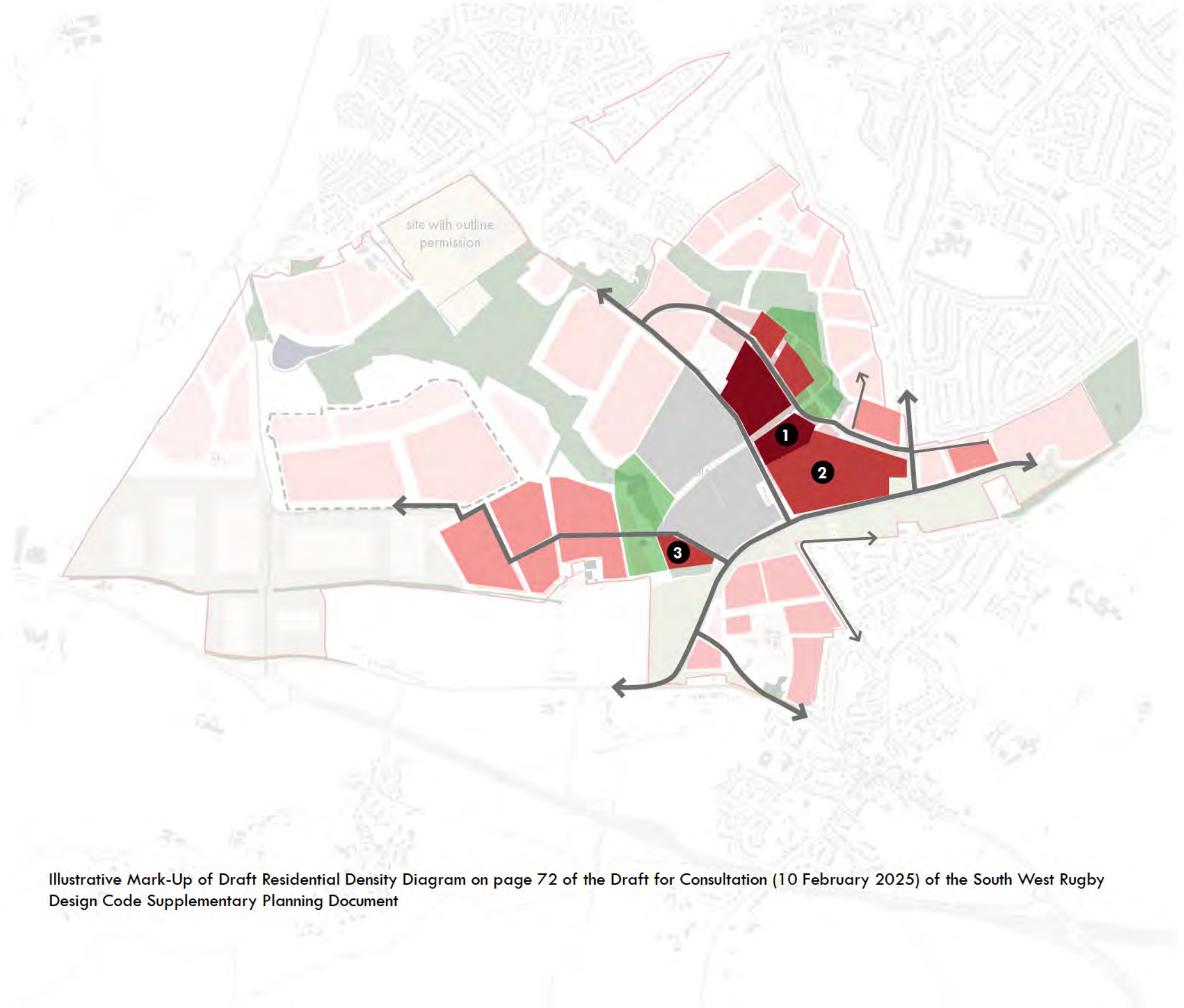
Illustrative Mark-Up of Draft Framework Masterplan on Page 22 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document



# Suggested Amendments to the Residential Density Diagram (page 72)

General comment that this diagram should be updated in response to our other Framework comments. In addition, we'd suggest the following:

- 1** Suggest the Higher Density Zone of the Mixed Use Centre is extended further south to align with suggested updates on Page 50.
- 2** Suggest the entire development parcel to the south of the Mixed Use Centre is represented as being higher density given its proximity to the Mixed Use Centre.
- 3** Suggest this proposed development parcel has a density that matches those surrounding the Local Centre as indicated within the mark-up and reflect its importance as a gateway into the Windmill Neighbourhood.



Illustrative Mark-Up of Draft Residential Density Diagram on page 72 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document



# Suggested Amendments to the Building Heights Diagram (page 73)

General comment that this diagram should be updated in response to our other Framework comments. In addition, we'd suggest the following:

- 1** Suggest 3 storey zone is introduced along the Homestead Link Road frontage to allow for 3 storeys in this location.
- 2** Suggest this proposed development parcel allows for up to 4 storeys.
- 3** Suggest the up to 2.5 storey zones indicated within the diagram's legend is amended to say "Generally up to 2.5 storeys, with 3 storeys limited to strategic locations such as key buildings and gateways"
- 4** Suggest proposed building height is reduced to "Generally up to 2.5 storeys, with 3 storeys limited to strategic locations such as key buildings and gateways"
- 5** Suggest this zone is dropped in Scenario 2 to align with the drop in building heights that are proposed to its north along Cawston Spinney or enable an appropriate transition between the residential development to the east and south, and the potential employment area.
- 6** Development area within safeguarded land Scenario 2 should be set back to allow for a landscape and acoustic buffer between employment land and residential to the west and south.



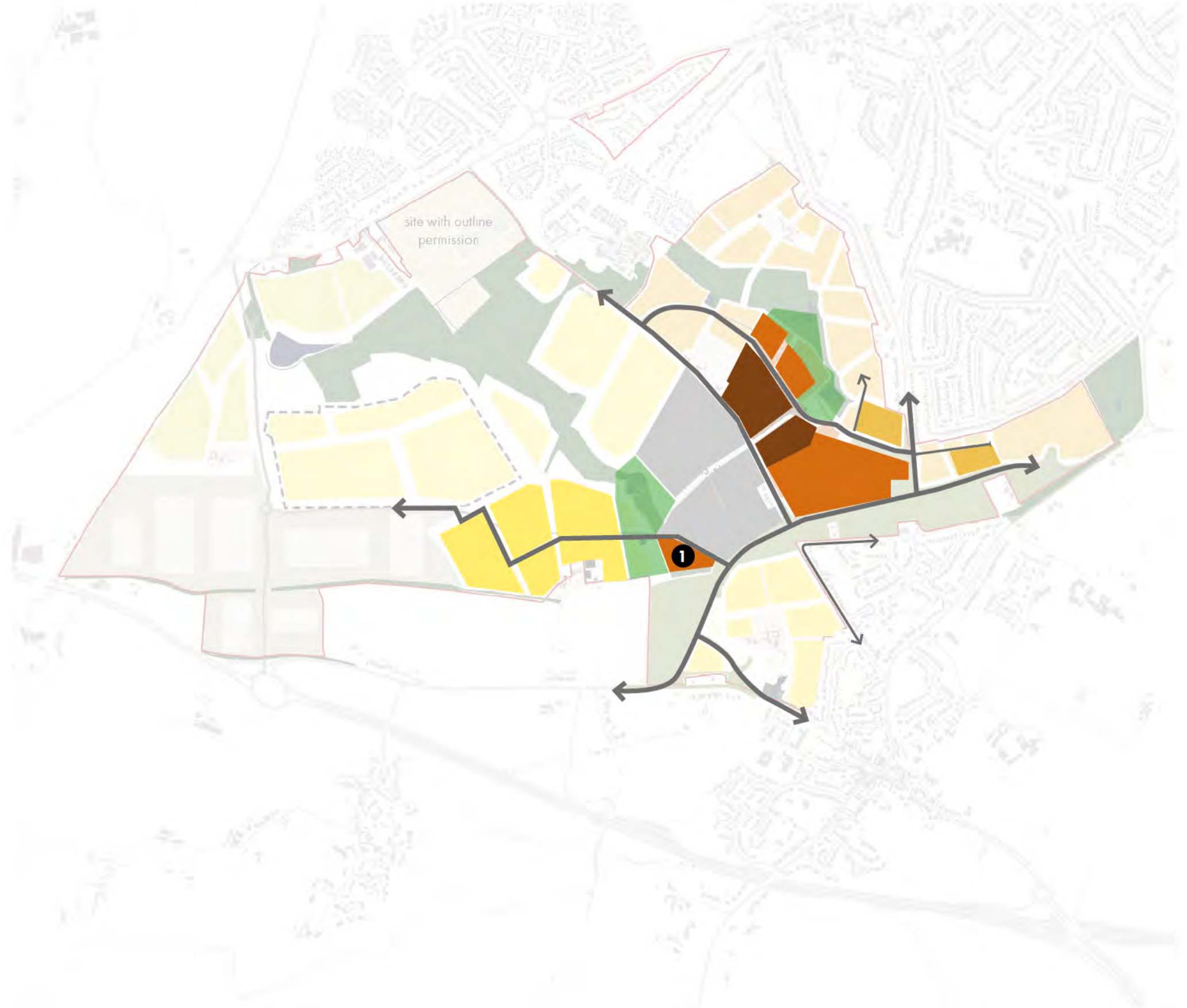
Illustrative Mark-Up of Draft Building Heights Diagrams for Scenarios 1 and 2 on page 73 of the Draft for Consultation (10 February 2025) of the South West Rugby Design Code Supplementary Planning Document



# Suggested Update of the Residential Area Types (page 74)

General comment that this diagram should be updated in response to our other Framework comments. In addition, we'd suggest the following:

- 1 Suggest this proposed development parcel is identified as part of the Urban Residential Development Type.





# Suggested Amendments to the Key Edges Diagram (Page 84)

General comment that this diagram should be updated in response to our other Framework comments. In addition, we'd suggest the following:

- 1** Suggest this parkland edge is moved to align with the suggested revision to the development parcel as per our other Framework Masterplan comments.
- 2** Suggest this part of the Homestead Link Road Edge is removed given our suggested amendment to the Framework Masterplan in this location.
- 3** Suggest the Homestead Link Road Edge is continuous across this development parcel.
- 4** Suggest the parkland edge is removed here as there will need to be a road between the development parcel and the open space as our emerging proposals have indicated.



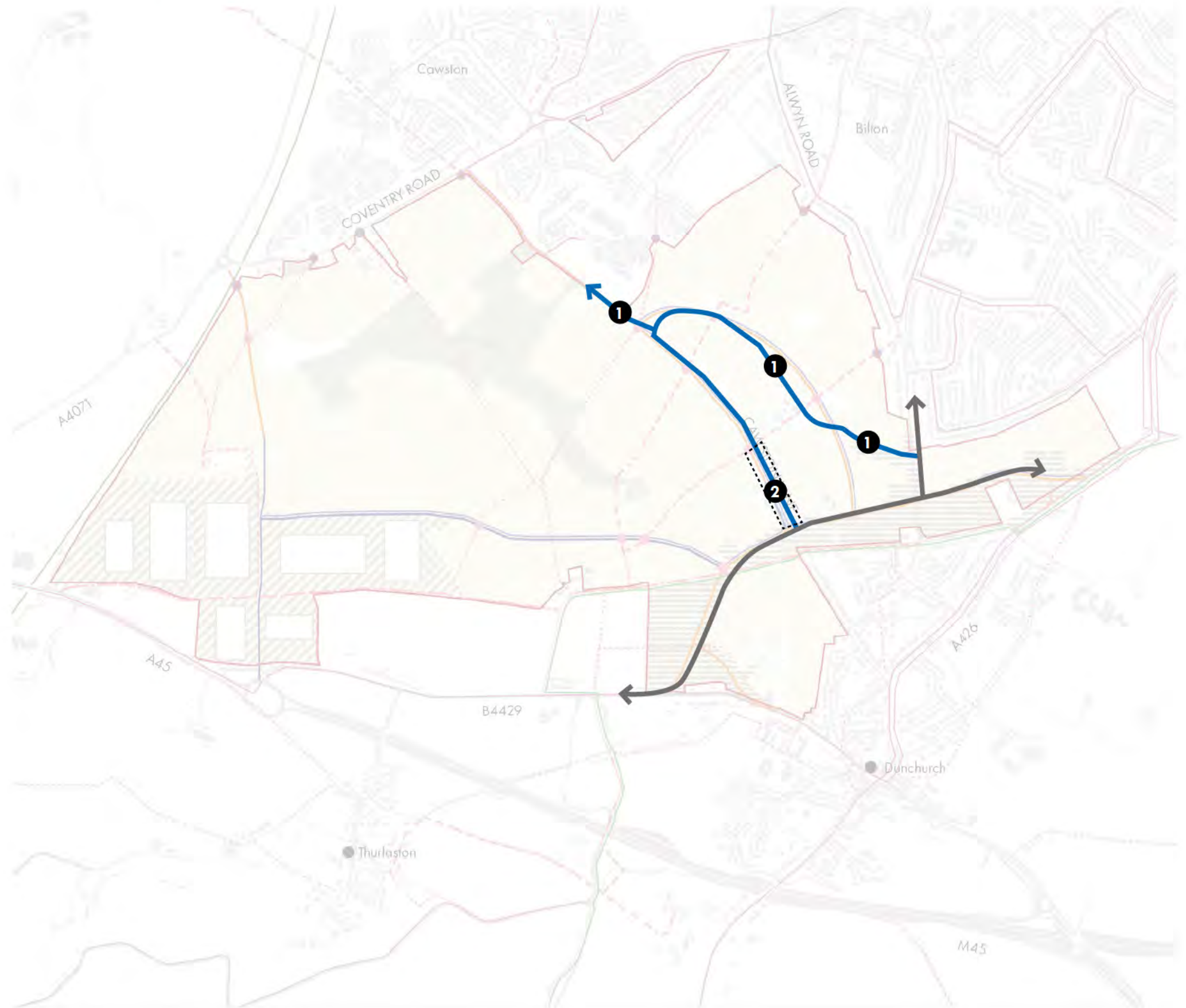
where built form will need to interact carefully. This drawing shows safeguarded land scenario 1 - residential uses.



# Suggested Updates to the Movement & Connection Diagram (Analysis)

- 1** This diagram does not reflect either Figure 2 of the South West Rugby SPD nor the proposed development or the details of Homes England's submitted planning application for the Community Spine Road and Cawston Lane Enhancements (R24/0733). Suggest the plan is updated to ensure consistency / alignment.
- 2** This diagram looks to reference a proposed Sustainable Transport Link at southern end of Cawston Lane. We suggest this reference is removed from this diagram as Homes England is not proposing this and this is also not reflected on the masterplan at Figure 2 of the South West Rugby SPD (December 2024) or approved Homestead Link Road Application.

In addition, we'd suggest this diagram is reviewed against our other access and movement comments to support alignment with the Framework Masterplan.

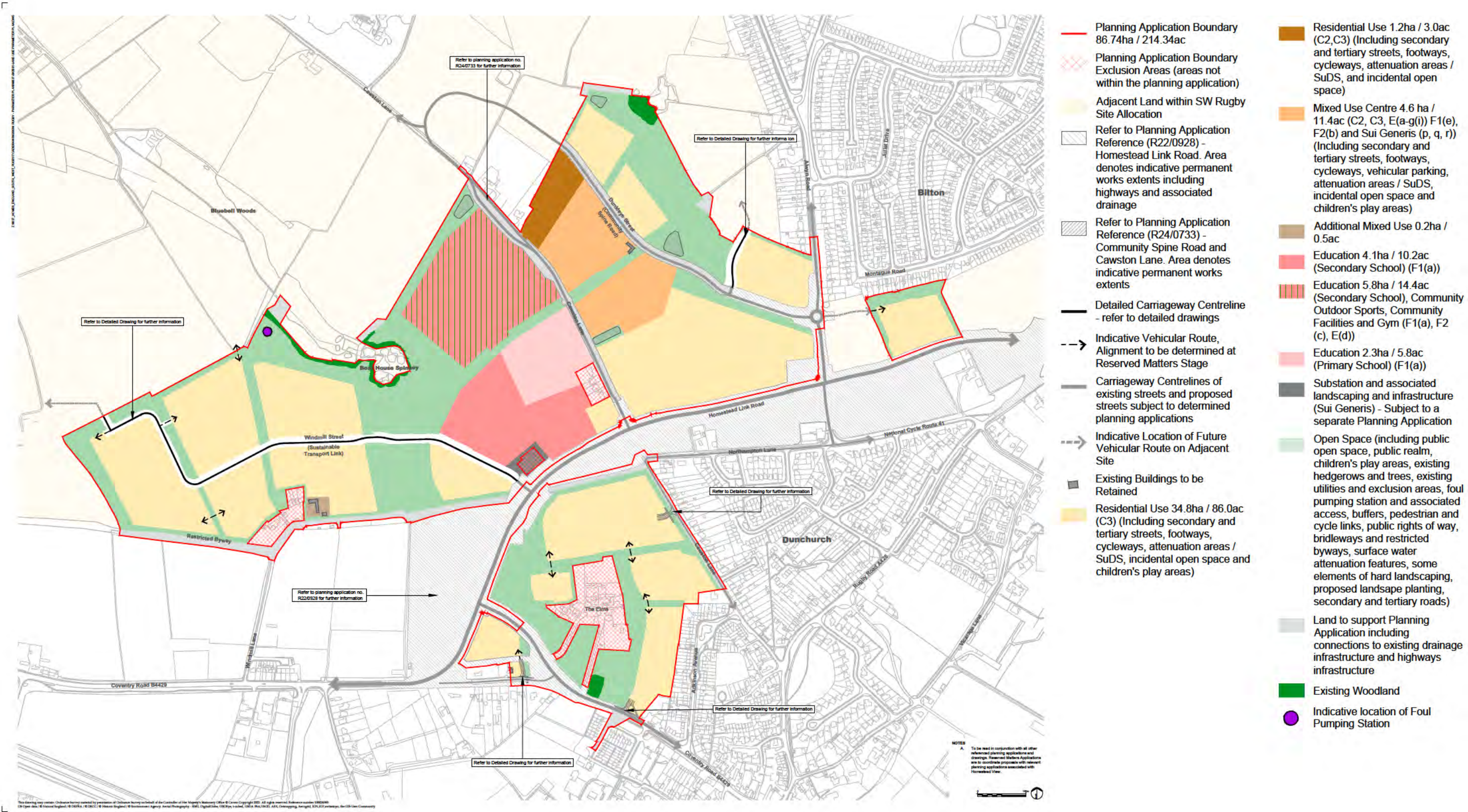




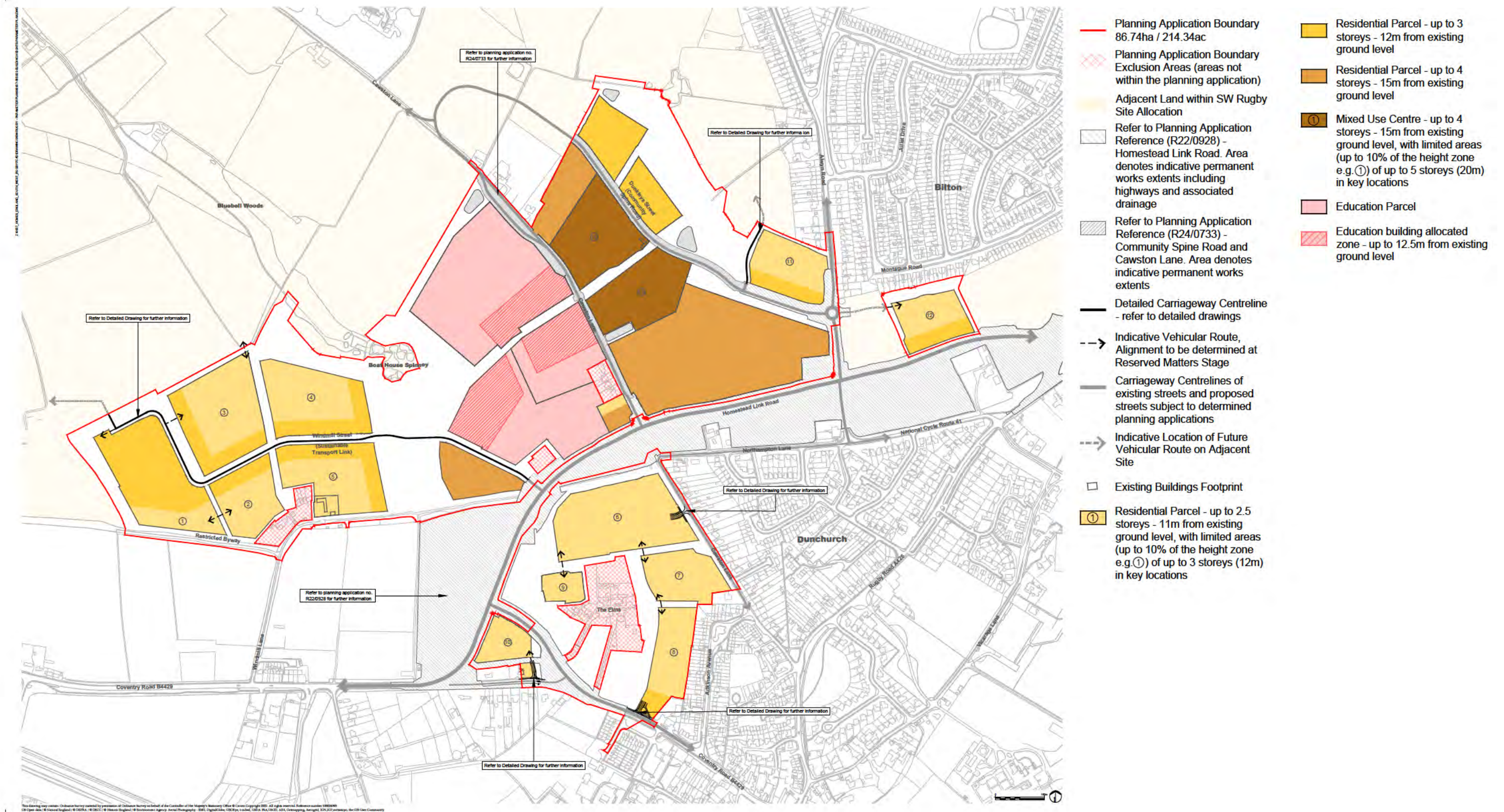
# Appendix: Supporting Plans



# Draft Land Use Parameter Plan

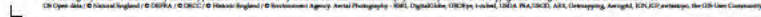




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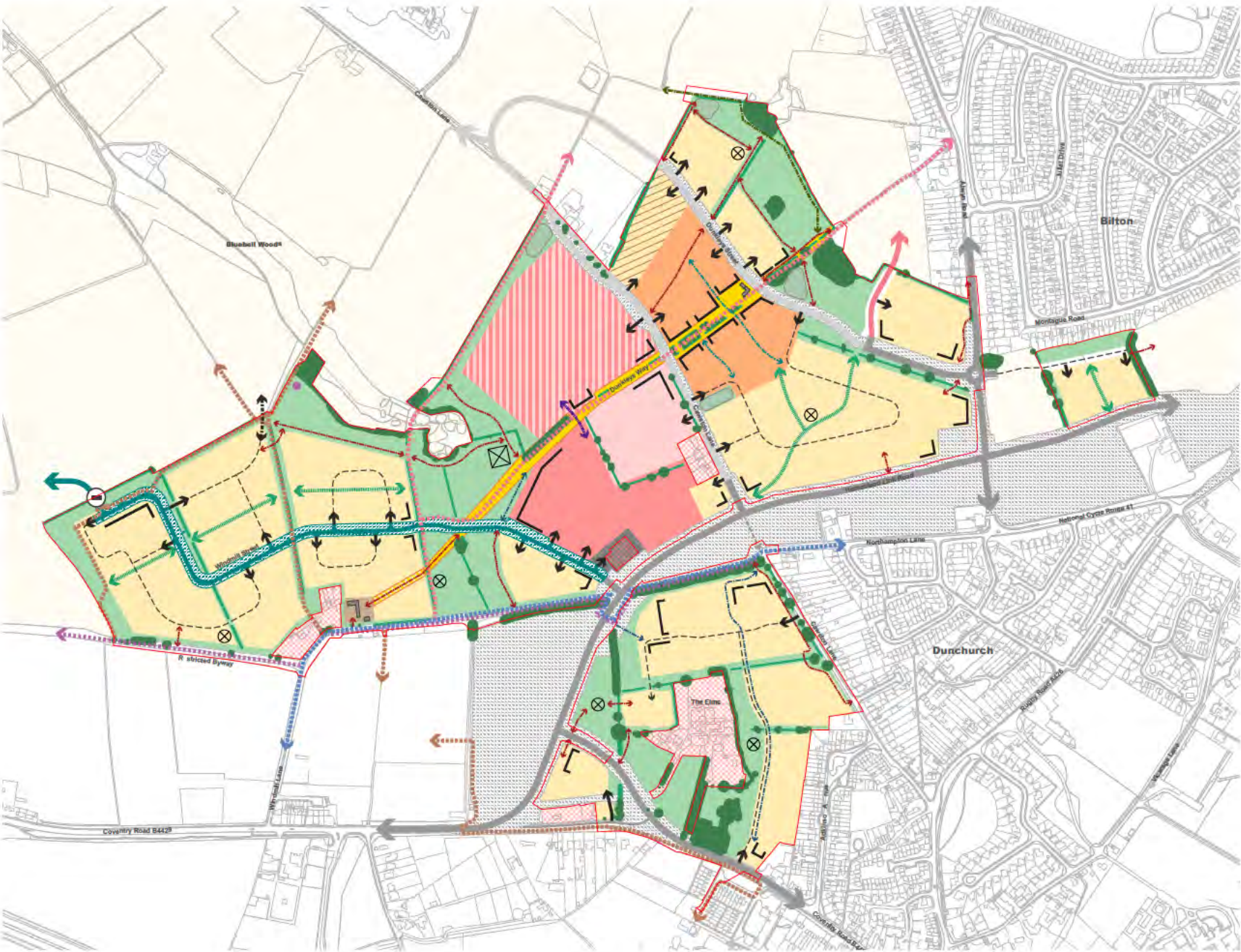


└





# Draft Site Wide Regulatory Plan



## General

- Planning Application Boundary
- Planning Application Boundary - Exclusion Areas
- Adjacent Land within South West Rugby Site Allocation

## Access and Movement

Dunkleys Way

### Public Rights of Way:

- Bridleway
- Footpath
- National Cycle Network - Route 41
- Restricted Byway

### Indicative Pedestrian and Cycle Routes:

- Shared Route
- Shared Pedestrian and Cycle Route
- Pedestrian Route
- Informal Route
- School Link

### Street and Vehicular Movement:

- Homestead Link Road (Planning Application Number R22/0928)
- Dunkleys Street and Cawston Lane (Planning Application Number R24/0733)
- Windmill Street
- Estate Road
- Vehicular Access Point
- Indicative Tertiary Street
- Bus Gate

## Urban Structure and Built Form

### Land Uses

- Residential (Use Class C3)
- Residential (Use Classes C2 and C3)
- Mix Use Centre
- Additional Mix Use at Windmill Farm
- Education (School Site)
- Education (Secondary School), Community Outdoor Sports and Community Facilities
- Education (Primary School)
- Substation and Associated Landscaping - Subject to a separate Planning Application

### Built Form

- Key Building
- Retained Building

### Other Infrastructure

- Indicative location of Foul Pumping Station

For additional information on Land Use please see the Land Use Parameter Plan

## Green and Blue Infrastructure

### Open Space and Green Links

- Open Space
- Indicative Green Link

### Woodland, Trees, and Hedgerows

- Indicative Retained Trees and Woodland
- Indicative Retained Hedgerows

### Play Provision

- Neighbourhood Equipped Area for Play (NEAP)
- Local Equipped Area for Play (LEAP)

For additional information on Woodland, Trees and Hedgerows please see the submitted Arboricultural Report



**From:** [Rebecca Frost](#)  
**To:** [Local Plan](#)  
**Subject:** South West Rugby Design Code SPD Consultation  
**Date:** 10 March 2025 15:18:03  
**Attachments:** [b0ed1e2e-581d-4dab-b4ed-f36ff3e6fd9.png](#)  
[image483818.jpg](#)  
[RBC Design Code SPD Response\\_Homes England.pdf](#)

---

FAO Abigail Murphy

Please find enclosed Homes England's response to the RBC Design Code SPD Consultation Draft dated 12<sup>th</sup> February 2025. The attached response includes:

- A cover letter from Homes England
- A tabulated response with comments on the general approach to the Design Code as well as specific commentary and suggested amendments to specific pages and codes.
- A mark up of various drawings included within the Design Code with suggested amendments to align the proposals with submitted or soon to be submitted planning applications. These comments are specific to Homes England's land holdings.

Kind regards

Rebecca Frost



Rebecca Frost

Associate



[Redacted]

tel: +44 (0)117 203 3628 | mob: 7960 587205

email: [Redacted]

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**From:** [Nisha Parekh](#)  
**To:** [Hayley Smith](#)  
**Cc:** [Abigail Murphy](#); [Karen Watkins](#); [Steve Harrison](#)  
**Subject:** South West Rugby Design Code  
**Date:** 07 May 2025 15:03:19  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[Section 5 – Public Spaces HA Comments 07-05-2025.pdf](#)

---

OFFICIAL

Hi Hayley,

**Email 2 of 2**

Further to our call today please find attached the comments from myself, Karen Watkins and Steve Harrison for the Movement and Public Space sections.

As a general comment there is a lot of US English being used throughout the document so this will need to be spell checked. Also, a number of the pictures are not the best case studies for movement or public spaces so these really need to be reconsidered with better examples that are local to Warwickshire.

I will liaise with Steve Harrison in regards to suitable dates for a Teams meeting next week and I will get back to you soon.

All the best and kind regards,

Nisha Parekh

**Planning and Highways Development Management Engineer**

Planning & Environment

Infrastructure, Planning & Environment

Communities

[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** Nisha Parekh  
**Sent:** 07 May 2025 2:01 PM  
**To:** Hayley Smith  
**Subject:** Re: South West Rugby Design Code  
Hi Hayley,



Thank you for your email. I rang you just now but I didn't get through to you.

Myself, Karen and Steve Harrison have been through the information for the Design Code and I was just writing up the notes. I will send them over to you shortly once they are complete. If you need to speak to me, my telephone number is 01926412521.

Kind regards,

Nisha Parekh

**Planning and Highways Development Management Engineer**

Planning & Environment

Infrastructure, Planning & Environment

Communities

[REDACTED]  
[REDACTED]  
[REDACTED]

---

[REDACTED] Hayley Smith

**Sent:** 07 May 2025 1:54 PM

**To:** Nisha Parekh

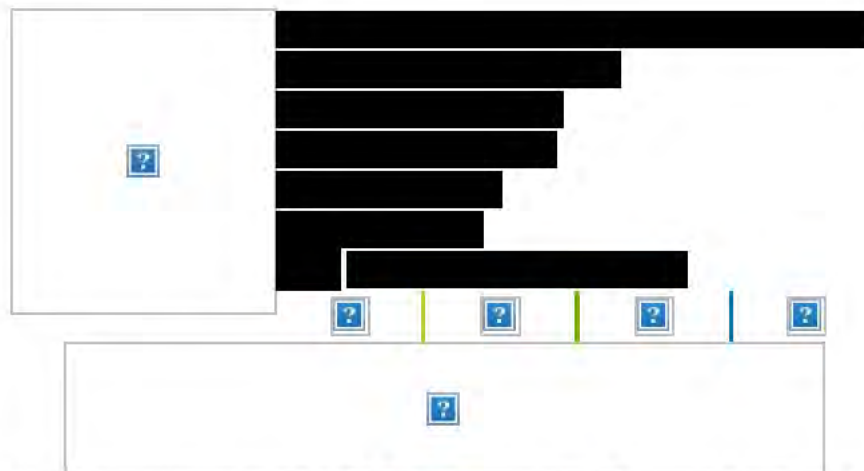
**Subject:** South West Rugby Design Code

Hi Nisha

Apologies for the email – I was hoping to speak to you, but can't locate a phone number. Could you share your number by return or call me on the mobile number below please? I am just hoping to catch up regarding the above, as I believe Karen is away now.

Regards,

Hayley Smith



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[REDACTED]  
[REDACTED]



VIA EMAIL ONLY: [REDACTED]

[REDACTED]

**South West Rugby Design Code Supplementary Planning Document public consultation**

Thank you for forwarding me details of the South West Rugby Design Code Supplementary Planning Document (SPD)

National Highways is responsible for the operation and maintenance of the Strategic Road Network (SRN) in England; this network includes all major motorways and trunk roads, which in Rugby, include the M6 Motorway, A45 and A46 Trunk Road, which pass through the south and north of the borough respectively.

Based on our review of the Design Code document, we can confirm that we could not identify any information that could potentially impact the SRN that has not been already assessed through the Borough Plan consultation process.

We note that where any of the sites either bound, or located in close proximity to, the SRN, or otherwise have a potential to impact on its safe and efficient operation, then National Highways should be consulted by way on a planning application.

This will ensure that assessments of boundary or transport related impacts are undertaken in adherence to the appropriate standards and guidance and any issues arising are identified at the earliest possible stage.

We consider that we have no further comments to make with regards to this consultation. Please do not hesitate to contact me if you require any more information or clarification.



Yours sincerely





**From:** [Adrian Chadha](#)  
**To:** [Local Plan](#)  
**Cc:** [Patrick Thomas](#); [Ijas Muhammed](#)  
**Subject:** South West Rugby Design Code SPD Consultation  
**Date:** 10 March 2025 12:37:45  
**Attachments:** [South West Rugby Design Code SPD.pdf](#)

---

**FAO: Hayley Smith**

Please find attached National Highways response to the above referenced consultation.

Kind regards,

**Adrian Chadha**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

with the planning system please visit

[https://nationalhighways.co.uk/media/imvluu5w/final-cre23\\_0370-nh-planning-guide-2023.pdf](https://nationalhighways.co.uk/media/imvluu5w/final-cre23_0370-nh-planning-guide-2023.pdf)

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**From:** [SM-NE-Consultations \(NE\)](#)  
**To:** [Local Plan](#)  
**Subject:** FAO Ms Hayley Smith REF: South West Rugby Design Code Supplementary Planning Document (SPD)  
**Date:** 20 February 2025 14:03:30  
**Attachments:** [image001.png](#)  
[502439 Natural England Response Letter draft South West Rugby Design Code SPD.pdf](#)

---

Your Ref: South West Rugby Design Code SPD

Our Ref: 502439

Dear Ms Smith

Thank you for your consultation request dated and received by Natural England on 10<sup>th</sup> February 2025.

Please find attached Natural England's response letter to your consultation request.

If you have any queries, please contact [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

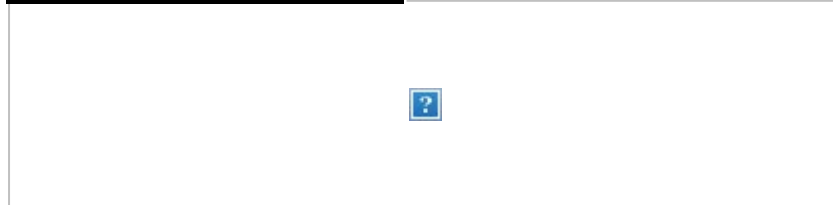
Yours sincerely

Sharon Jenkins

Assistant Officer

Natural England

Consultation Service



**Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.**

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

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[REDACTED]  
[REDACTED]

BY EMAIL: [REDACTED]

## South West Rugby Design Code Supplementary Planning Document (SPD)

Natural England does not have any specific comments on your South West Rugby Design Code Supplementary Planning Document.

## Strategic Environmental Assessment/Habitats Regulations Assessment

—

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



**From:** [Sarah Matile](#)  
**To:** [Local Plan](#)  
**Subject:** RE: Consultation - South West Rugby Design Code SPD  
**Date:** 10 February 2025 16:20:41  
**Attachments:** [image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.png](#)  
[image014.png](#)  
[image015.png](#)  
[image016.png](#)  
[image017.png](#)

---

Thank you for consulting NBBC on this, we do not have any comments to make.

Many thanks

Sarah

**Sarah Matile**

Principal Planning Policy Officer

T: 02476376380



Logo? ? Description automatically generated



---

**From:** Local Plan

**Sent:** 10 February 2025 13:36

**To:** Local Plan

**Subject:** Consultation - South West Rugby Design Code SPD

Dear Sir/Madam

**The Town and Country Planning (Local Planning) (England) Regulations 2012  
South West Rugby Design Code Supplementary Planning Document public  
consultation**

Rugby Borough Council is consulting on a draft South West Rugby Design Code Supplementary Planning Document from **10 February 2025 until 5pm on 10 March 2025**.

The supplementary planning document has been produced to provide concise and often illustrated design requirements for the physical development of South West Rugby. The document can be accessed on the council's website [South West Rugby Design Code consultation - Rugby Borough Council](#) and at the following locations:

- 
- 



• [REDACTED]

Consultation responses can be sent via

1) email to [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) with 'South West Rugby Design Code SPD Consultation' in the subject line, or

2) by post to:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Please include the relevant section of the document, page number and (where applicable) a principle number with any comments, so that we can fully understand and consider them. Please note, if you submit a response by email you do not need to submit a paper copy as well. Consultation responses will be made available for public inspection.

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

Should you require any further information, please contact the Development Strategy team.

Regards,

Hayley Smith



Principal Planning Officer (Development Strategy)  
Development Strategy Team  
Growth and Investment  
Rugby Borough Council  
Tel: 01788 533741  
M: 07827818188  
**Mail:** [Hayley.Smith@rugby.gov.uk](mailto:Hayley.Smith@rugby.gov.uk)



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**From:** [clerk@newtonparishcouncil.org.uk](mailto:clerk@newtonparishcouncil.org.uk)  
**To:** [Local Plan](#)  
**Subject:** South West Rugby Design Code SPD Consultation  
**Date:** 18 February 2025 17:22:09  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

---

Good afternoon,

Please be advised that Newton & Biggin Parish Council does not wish to make any comments.

Kind regards

Rebecca Barry

Clerk and Responsible Financial Officer

Newton and Biggin Parish Council

Telephone: 07935 209451

Please be aware that my contactable hours are as follows:

Monday to Thursday - after 4pm

Friday - available all day.

---

**From:** Local Plan

**Sent:** 10 February 2025 13:36

**To:** Local Plan

**Subject:** Consultation - South West Rugby Design Code SPD

Dear Sir/Madam

**The Town and Country Planning (Local Planning) (England) Regulations 2012  
South West Rugby Design Code Supplementary Planning Document public  
consultation**

Rugby Borough Council is consulting on a draft South West Rugby Design Code Supplementary Planning Document from **10 February 2025 until 5pm on 10 March 2025**.

The supplementary planning document has been produced to provide concise and often illustrated design requirements for the physical development of South West Rugby. The document can be accessed on the council's website [South West Rugby Design Code consultation - Rugby Borough Council](#) and at the following locations:

- [REDACTED]
- [REDACTED]
- [REDACTED]

Consultation responses can be sent via

1) email to [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) with 'South West Rugby Design Code SPD Consultation' in the subject line, or

2) by post to:

[REDACTED]  
[REDACTED],





Please include the relevant section of the document, page number and (where applicable) a principle number with any comments, so that we can fully understand and consider them. Please note, if you submit a response by email you do not need to submit a paper copy as well. Consultation responses will be made available for public inspection.

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

Should you require any further information, please contact the Development Strategy team.

Regards,

Hayley Smith



Principal Planning Officer (Development Strategy)  
Development Strategy Team  
Growth and Investment  
Rugby Borough Council  
Tel: 01788 533741  
M: 07827818188





**From:** [Richard Allanach](#)  
**To:** [Local Plan](#)  
**Subject:** Fw: Consultation - South West Rugby Design Code SPD  
**Date:** 10 March 2025 14:19:02  
**Attachments:** [image001.png](#)  
[image013.png](#)  
[image015.png](#)  
[image017.png](#)  
[image019.png](#)  
[image021.png](#)  
[South West Rugby Design Code SPD.docx](#)

---

Dear Hayley,

Thank you for the invitation.

Please find attached my response to this consultation.

Best Wishes,

Richard Allanach

---

**From:** Local Plan  
**Sent:** 10 February 2025 13:29  
**To:** Local Plan  
**Subject:** Consultation - South West Rugby Design Code SPD

Dear Sir/Madam

Further to your participation in workshops regarding the South West Rugby Design Code, I am writing to let you know that a draft document has now been published for public consultation. Details of the consultation and how to respond are included below. Alongside the draft South West Rugby Design Code Supplementary Planning Document, a report has also been published outlining the workshops and other engagement which have informed the development of the design code.

We thank you for your input to the design code to date, and look forward to any feedback you might provide to the consultation.

**The Town and Country Planning (Local Planning) (England) Regulations 2012  
South West Rugby Design Code Supplementary Planning Document public  
consultation**

Rugby Borough Council is consulting on a draft South West Rugby Design Code Supplementary Planning Document from **10 February 2025 until 5pm on 10 March 2025**.

The supplementary planning document has been produced to provide concise and often illustrated design requirements for the physical development of South West Rugby. The document can be accessed on the council's website:

[rugby.gov.uk/w/south-west-rugby-consultation](https://rugby.gov.uk/w/south-west-rugby-consultation), and at the following locations:

- [REDACTED]
- [REDACTED]



• [Redacted]

Consultation responses can be sent via

1) email to [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) with 'South West Rugby Design Code SPD Consultation' in the subject line, or

2) by post to:

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

Please include the relevant section of the document, page number and (where applicable) a principle number with any comments, so that we can fully understand and consider them. Please note, if you submit a response by email you do not need to submit a paper copy as well. Consultation responses will be made available for public inspection.

You have received this email because your contact details are held further to the event(s) to them being provided for the purpose of registering for an event relevant to the preparation of the South West Rugby Design Code SPD. If you no longer wish to be contacted, please let us know.

To view the council's development strategy privacy notice please visit:

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

Should you require any further information, please contact the Development Strategy team.

Regards,

Hayley Smith



Principal Planning Officer (Development Strategy)  
Development Strategy Team  
Growth and Investment  
Rugby Borough Council  
Tel: 01788 533741  
M: 07827818188  
**Mail:** [Redacted]





**From:** [Richard Basnett](#)  
**To:** [Local Plan](#)  
**Subject:** South West Rugby Design Code SPD Consultation  
**Date:** 10 February 2025 18:13:37

---

Sir,

Please find attached my comments to be considered on the above planning application.

- 1) The cycle greenway needs to be updated to include full access from Cawston to Draycote water.
- 2) Better & more detailed plans on community centre, who, what, where to entrust the developers are responsible for the sites to be fully funded, if not already.
- 3) Green spaces to be adopted by WCC, thus no more third party involvement in companies making money from land maintenance!
- 4) Detailed actions to safeguard Cawston ancient woodland.
- 5) The whole site need a better link road onto existing A45 / to M45 island. It's unacceptable the current plans, it would bottle neck all traffic onto the Rugby Rd, Alwyn Rd and towards Potford Dam rd which frankly is a poor link rd towards the A45 currently anyway.( this section of the A4071 Coventry rd) needs to be improved to help cope with the expected pressure of increased traffic.  
There is also "NO" pedestrian access on the stretch of road and is hazardous to cyclists and by experience, seeing people attempting to walk down this road!
- 6) Developers need to be held accountable and reassure planners in binding contracts to ensure that the developments are adopted in a timely manner. Far too often, residents have to wait 20 years + to have their streets adopted!
- 7) Access to all areas need to be adequate to accommodate the local Fire Service vehicles especially in an emergency situation. A local Fire station which would include Police & Ambulance too would be a huge benefit to the community and the developers should be made accountable to ensure that they fund this site.

I hope that my comments will help you in the final planning application.

Regards,

Mr R Basnett




**From:** [Rajvir Bahey](#)  
**To:** [Local Plan](#)  
**Subject:** 20250307 Sport England response 'South West Rugby Design Code SPD Consultation'  
**Date:** 07 March 2025 16:42:25

---

Dear Development Strategy Team,

Please find below Sport England's comments on South West Rugby Design Code SPD consultation document:

- Sport England considers that the development must facilitate and promote active travel opportunities for **all** residents by ensuring that appropriate infrastructure are in place from the outset. As such, H8.08 it must be a requirement for cycle storage to be provided.
- In relation to the Framework Masterplan (page 22) it is disappointing that the South West Rugby Masterplan SPD does not appear to provide dedicated playing field provision to meet the needs of a large residential site which page 46 states that there should 8.9ha of playing field provision.
- Sport England are supportive of the requirement for mobility hubs at the local centre alongside mini mobility hubs. Though within the hubs (or at least the local centre ) toilet provision should be included which would improve access and inclusivity for all users from young to old, not having such provision could deter users. Similarly, the provision of a café could encourage users to undertake active travel opportunities by having a destination to visit whilst breaking up a trip.
- Sport England consider that cycle parking must be placed at the front entrance or side access point, this provides an area that is safe and viewable which would allay safety concerns of users not being hidden at a perceived risk of being attacked for their possession or the bike being stolen due to no surveillance.

Sport England would encourage the authority to review design code against Sport England's Active Design Design Code Guide February 2025, with Active Design referenced within the Masterplan SPD for the site. [https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2025-02/DesignCodesChecklist-V4-03-02-25.pdf?VersionId=pdn5xlaqB8lqgY6UTm4WHmcFFgH9I2\\_I](https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2025-02/DesignCodesChecklist-V4-03-02-25.pdf?VersionId=pdn5xlaqB8lqgY6UTm4WHmcFFgH9I2_I)

Should you have any queries regarding the above please do not hesitate in contacting me.

Kind Regards

Raj

**Rajvir Bahey**

Planning Manager

**T:** 020 7273 1673

**M:** 07879488344







We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

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[illegible]



**It is not clear whether the Code be regularly updated? The South West Rugby SPD is targeted for annual reviews and updates. Is the same target to be applied to the Design Code SPD?**

The detailed comments below are from a Taylor Wimpey perspective and oriented towards the parts of the allocation that are controlled by Taylor Wimpey. This is not to say we do not have comments on other parts of the allocation. We appreciate, however, that the relevant parties (e.g. Homes England, Catesby and Tritax) will be commenting on these aspects in detail.

**We would envisage the comments being the reference for detailed engagement meetings involving the Council's Design Code team and the South West Rugby development parties, to support the updating and refinement of the Code prior to its adoption.**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]











[illegible]



[illegible]



**From:** [John Kelly - TW Strategic Land](#)  
**To:** [Local Plan](#)  
**Subject:** South West Rugby Design Code SPD Consultation  
**Date:** 10 March 2025 15:43:51  
**Attachments:** [image001.png](#)  
[Rugby Design Code TW submission 10.3.25.pdf](#)

---

Please find attached the submission on behalf of Taylor Wimpey.

Kind regards,

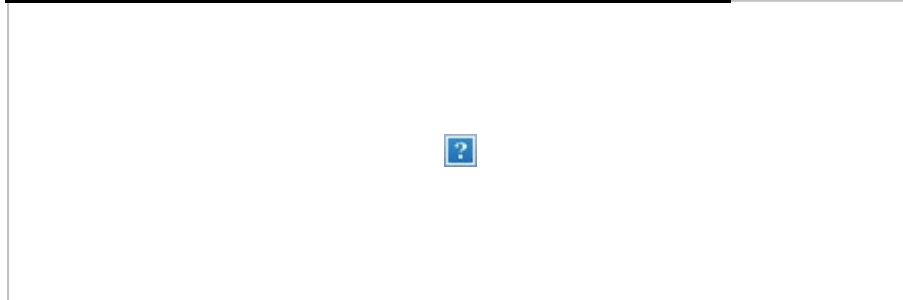
John.

**John Kelly MRICS | Strategic Project Director | Taylor Wimpey Strategic Land**

[Redacted signature block]

[Redacted contact information]

[Redacted contact information]



### **Taylor Wimpey Challenge 2025**

This May, I will be taking on the hills, wind and rain of the Yorkshire Dales to raise money and support the vital work of the [Inspiring Young Lives - Youth Adventure Trust](#) and [Macmillan Cancer Support | The UK's leading cancer care charity](#).

Please sponsor my team by clicking [Strat t'Top: Climbing for a Cause!](#) and making a donation to our GivenGain page.

If you'd like to and are able to, we'd also be incredibly grateful if you were to cover the small platform fee to ensure 100% of your donation reaches our chosen charity/charities. This is an option that you'll see at the end. Either way, we really appreciate your generous support.

Thank You !

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**From:** [Louise Steele](#)  
**To:** [Local Plan](#)  
**Subject:** South West Rugby Design Code SPD Consultation  
**Date:** 10 March 2025 14:48:12  
**Attachments:** [image001.jpg](#)  
[Design Code SPD Reps Final.pdf](#)

---

PF/10844

Dear Sirs

On behalf of my client TBBD, please find attached representations to the above-mentioned document.

I would be grateful if you could confirm receipt.

With thanks

Louise

With kind regards,

Louise Steele BA(Hons) MTPL MRTPI

**Planning Director**



[REDACTED]

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**TOWN AND COUNTRY PLANNING ACT 1990**

**SUBMISSION IN RESPONSE TO THE CONSULTATION DRAFT  
SOUTH WEST RUGBY DESIGN CODE SUPPLEMENTARY  
PLANNING DOCUMENT MARCH 2025**

**MARCH 2025**

**BY FRAMPTONS TOWN PLANNING  
ON BEHALF OF TRITAX BIG BOX DEVELOPMENTS**

**REF: PJF/LS/10844**



## CONTENTS

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| 2.0 | Design Code SPD Comments | 5 |



## 1. INTRODUCTION

- 1.1 This statement has been prepared by Framptons on behalf of Tritax Big Box Developments (TBBD), in response to Rugby Borough Council's Draft Design Code Supplementary Planning Document Consultation dated February 2025. (Please note that these comments relate to the version of the document dated 10.2.25.)
- 1.2 TBBD have land interests at the South West Rugby allocation site, which is allocated for 5,000 dwellings and 35 hectares of B8 employment land in the adopted Local Plan (June 2019) (policies DS3, DS4, DS5, DS8 and DS9).
- 1.3 TBBD submitted a planning application in November 2017 for the employment element of the allocation (application ref. R16/2569). The application was for *'Outline planning permission for up to 186,500 sq m (2,007,470 sq ft) of buildings for Class B8 Warehousing and Distribution, with ancillary Class B1(a) offices, land for a fire station (0.4 hectares) together with associated site infrastructure including lorry parking, landscaping, and sustainable drainage details. Demolition of Station Farmhouse and Outbuildings. Means of access from the A45/M45 junction up to and including the link to the crossing of the Northampton Lane byway are included for approval'*.
- 1.4 This application was approved and subsequent reserved matters applications have been approved and implemented on the site by TBBD, resulting in the erection of 7 employment buildings on the Phase 1 employment land at South West Rugby.
- 1.5 To the north of TBBD's employment sites is TBBD's Phase 2 employment site, this is referred to as 'Safeguarded Land in the Council's current adopted Local Plan. The Council have recently published an emerging development plan 'Local Plan Preferred Options', which allocates the safeguarded land and land to the east of the safeguarded land as employment land. The Local Plan Preferred Options is likely to go out to public consultation over easter. While the draft Design Code SPD included an 'either/or' option for employment and residential development on some of this land, it does not address this across the whole area. This change needs to be considered and fully reflected in the Design Code SPD.
- 1.6 TBBD have also submitted a planning application in June 2019, for a phase of the residential element of the allocation to the north of the allocation (application ref. R18/0995) for *'Residential development of up to 275 dwellings (Use Class C3); provision of open space, including means of access into the site (not internal roads) and associated works, with all other matters (relating to appearance, landscaping, scale and layout) reserved. Demolition of buildings referenced A-K and 6 silos'*, at land at Cawston Farmhouse, South of Coventry Road. On 12 February 2025, the planning committee resolved to approve this application subject to the completion of a s106 agreement.
- 1.7 TBBD have also submitted an outline planning application in August 2022, for a second phase of the residential element of the allocation to the west of the allocation (application ref. R22/0853) for *'Residential development of up to 350 Dwellings (Use Class C3); provision of open space, including means of access into the site (not internal roads) and associated works, with all other matters (relating to appearance, landscaping, scale and layout) reserved'*. This application has not yet been determined.



## 1.8 TBBB's main comments are:

Disappointment at the lack of engagement prior to public consultation on the draft document. TBBB have been involved in the promotion of the site for in excess of a decade, with interests in employment, residential and management of Cawston Spinney, and have a thorough understanding of site opportunities and constraints. The draft Design Code pays nothing more than passing reference to the now-completed 1.9 million square feet of logistics development, and how its design evolution came forward in full knowledge of the wider South West Rugby allocation, nor the influence that its design has on the context of the surrounding area.

The content of the SPD must be rigorously checked to ensure it is consistent with what the adopted development plan policy actually states. Currently, and as set out below, there are a number of areas where the SPD seeks to introduce new planning policy – something that it clearly cannot do.

SPDs are defined by the NPPF to mean:

*'Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.'*

Planning Practice Guidance (Paragraph: 008 Reference ID: 61-008-201903150) sets out the role of Supplementary Planning Documents. It states that SPDs:

*'should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, **they cannot introduce new planning policies into the development plan.** They are however a material consideration in decision-making. **They should not add unnecessarily to the financial burdens on development.***

A Design Code which stipulates, for example the heights of the proposed employment buildings, or imposes a residential density below that of two live planning applications, represents the introduction of a significant limitation or additional criterion not found in the adopted development plan.

The legal position as set out by the Court of Appeal in the *Cherkley Campaign* case is expressly supported by both the NPPF and PPG, both of which make clear that the role of SPDs is to provide further detail and guidance, and not to introduce new planning policies into the development plan.

TBBB query if there is a need for the Design Code, first as there is already a SPD in place for the allocation. Second in particular in respect of the employment buildings (which have been built out for Phase 1) and for Phase 2 the proposed design and heights of the buildings will flow from the design language of the approved buildings on the existing Symmetry Park. South West Rugby has so far



failed to deliver a single dwelling, and the imposition of the SPD in its proposed form has significant potential to further delay delivery.

The Design Code needs to provide for flexibility and not be overly prescriptive as per the current drafting.

In the emerging Local Plan (the Preferred Option Draft) the safeguarded land, which comprises the Phase 2 employment land, is now allocated for employment development (as set out in draft policies S1, S7, S8 and S9 and the Site Allocations template in the appendix to the draft local Plan). The draft Design Code needs to reflect the fact that the safeguarded land is now a confirmed employment allocation.

Design Codes are only as good as the people who administer and interpret them, if adopted the Council will need ensure that there are the right people with the right skills in place to interpret some of the guidelines. This will add an additional resource burden and timescale on both the Council and Applicants, risking further delay in the delivery of new homes at South West Rugby.

The requirements of the Design Code need to be assessed in terms of their potential impact on the viability of schemes. In terms of TBBD's residential interests, a reduced density and prescriptive house typology is set out, which does not reflect the two live planning applications and significantly reduces their viability, marketability and delivery. In terms of TBBD's employment interests, the Design Code does not acknowledge the design requirements of the buildings themselves, nor the established presence and design language of the existing phase of development.

There is also a need for any Codes to align (and not contradict) with other policy requirements in the Local Plan which may impact on design, for example BNG requirements.

- 1.9 In conclusion, if the Design Code is to be pursued, it is respectfully suggested that further engagement is undertaken with the developers and promoters of the South West Rugby allocation to ensure that the above concerns are appropriately reflected and overcome to ensure that a viable, successful development can come forward. As drafted, the Design Code will simply fail to deliver this.



## **2. TRITAX SYMMETRY DRAFT DESIGN CODE SPD COMMENTS**

### **INTRODUCTION**

- 2.1. As a general comment, the content of the SPD must be rigorously checked to ensure it is consistent with what the development plan policy actually states. Currently, and as set out below, there are a number of areas where the SPD seeks to introduce new planning policy, which it clearly does not have the ability to do.
- 2.2. Page 6 refers to code requirement of the following forms, the first is 'Must' 'a mandatory requirement'. This is too onerous, and the word should be replaced throughout with 'should, if feasible'.
- 2.3. Page 6 also sets out a requirement to submit a compliance tracker with applications. If submitted it would be helpful to append a proforma of this tracker to the Design Code to guide developers as to the form of the tracker.

### **ENGAGEMENT**

- 2.4. It is striking that there is no reference to engagement with TBBD or other promoters/developers with an interest in South West Rugby. TBBD have been involved in the promotion of the site for in excess of a decade, with interests in employment, residential and management of Cawston Spinney, and have a thorough understanding of site opportunities and constraints. To date, TBBD have delivered c.1.9m sq ft of employment with landscaping and bunding provided to provide a suitable integration to neighbouring parcels. TBBD have also secured necessary land to facilitate delivery of the Council's preferred Potsford Dam Link Road alignment, and also control c.50% of Cawston Spinney woodland. As a long term investor focused on bringing forward the wider South West Rugby allocation as a whole, this lack of engagement is particularly disappointing.

### **SITE STATUS**

- 2.5. Page 10 acknowledges the employment development is 'already built/in progress'. The full development of 7 units is now complete. As set out above this begs the question as to whether a Design Code is required, particularly for the employment land, and if so, why the design principles approved for boundaries with neighbouring land parcels (i.e. landscaping/bunding) approved through the grant of planning permission have not been reflected.
- 2.6. On page 11 it is noted that the Design Code presents two options for the safeguarded land for residential or employment, it is considered that the code, due to the draft allocation for the site (as set out above) should just refer to employment. This will require a number of amendments including the land to the east which is also no longer proposed as residential development, and the removal of the 'tertiary route' and sub-division of the site into small parcels which do not reflect its preferred use as additional strategic logistics development.
- 2.7. The plan on page 12 needs to be updated to show the buildings that have been developed particularly in relation to the employment land, otherwise it misguidedly looks like the built out site is 'landscape'. There are also a number of historic features shown on this



plan (and a number of others throughout the document) which no longer exist, and whose removal was approved as part of the grant of planning permission for the employment development.

## VISION

- 2.8. No comments.

## FRAMEWORK MASTERPLAN

- 2.9. Page 22 identifies an area of 'Proposed open space' to the east of the Potsford Dam link/northwest of Cawston Spinney. It may be that this is intended to be an illustration of how the principle of green/blue infrastructure connectivity already set out in the South West Rugby could be delivered. At this stage, the detailed route and design of this key infrastructure has not been defined, and this is therefore considered unduly restrictive and onerous.

## CONTEXT + CO ORDINATION

- 2.10. No comments.

## MOVEMENT

- 2.11. As a general comment, this section:  
applies to highways infrastructure much of which will be adopted by WCC, if such infrastructure is to be adopted it will have to reflect various WCC adoption guidance so it is queried why this needs to be repeated in a design code;  
the Introduction section also refers to other guidance e.g. and among others the Warwickshire Design Guidance and Manual for Streets, therefore TBBD question again why further guidance in a design code required.
- 2.12. The plans throughout this section need to be updated to reflect an employment layout (as allocated in the emerging local Plan). For example, the plans throughout this section show a tertiary street going east to west going through the employment land and this is not proposed or required, nor does it meet the requirements of strategic logistics development. The proposed alignment of all routes should also be clearly shown as indicative.
- 2.13. As a general comment the word 'must' is too stringent; and should be replaced with 'should, where feasible'.
- 2.14. The following proposed codes are too stringent and it is request that they are amended as follows:

| Current Wording   | Suggested amended wording in bold and strikethrough  |
|---|--|
| MO.53 This should be integrated into the built form where possible, such as in semi basements or decks. Surface level parking must be positioned towards the rear of plots, | This should be deleted. For logistics units, it is far better that parking areas address street frontages, with entrances positioned fronting onto streets. If they are required to be at the rear of plots, then service yards/HGVs would |



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| away from the main street frontage, with landscaping used to reduce visual impact. | by default need to be positioned fronting streets, which surely is not the intention of the requirement. |
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## NATURE

- 2.15. As a general comment the word 'must' is too stringent; and should be replaced with 'should where feasible'.
- 2.16. The maps on these pages are confusing, as they use historic mapping layers on this are confusing, for example the Phase 1 employment has now been building and the farmhouse and a number of hedgerows have already been approved for removal through employment. The plans need to be updated throughout. On Page 43 map it states that i there an existing PROW along the west of the Phase 1 employment site, this is the proposed new bridleway which has not been implemented yet. The plans throughout should be amended to reflect these points.
- 2.17. Due to the form of the proposed employment development on the site which tends to include large floorplate buildings which require a level plateaued site, it may not be feasible to retain all existing landscape features, for NA.01 the suggested amendment is as follows:

| Current Wording  | Suggested amended wording in bold and strikethrough   |
|--|---|
| <p>NA.01 Key features of the landscape character which must be maintained include:</p> <ul style="list-style-type: none"> <li>• Tree avenues in the wider urban landscape are a feature on the skyline. Creating character for the urban fringe.</li> <li>• Mature trees within hedgerows must be preserved, maintained and promoted using new planting where trees are not prevalent</li> <li>• Woodland blocks that frame the landscape and break the plateau</li> <li>• Hedgerows as boundary treatments throughout.</li> <li>• The landscape within the eastern zones is typically framed by hedgerows and woodland blocks</li> <li>• PRoWs link landscapes and create access to landscape features, they must be retained or realigned and enhanced with additional landscape features to provide better connectivity within communities and support recreational use.</li> <li>• Maintain views to landscape and features, in particular Cawston Spinney.</li> <li>• The west of the site has an open landscape character surrounded by strong landscape framework of the Cawston Greenway, Cawston Spinney and mature trees which must be protected and enhanced</li> </ul> | <p>NA.01 Key features of the landscape character which <b>should</b> <del>must</del> <b>be where possible</b> be, maintained include:</p> <ul style="list-style-type: none"> <li>• Tree avenues in the wider urban landscape are a feature on the skyline. Creating character for the urban fringe.</li> <li>• Mature trees within hedgerows <b>should where possible</b> <del>must</del> be preserved, maintained and promoted using new planting where trees are not prevalent</li> <li>• Woodland blocks that frame the landscape and break the plateau</li> <li>• Hedgerows as boundary treatments throughout.</li> <li>• The landscape within the eastern zones is typically framed by hedgerows and woodland blocks</li> <li>• PRoWs link landscapes and create access to landscape features, they must be retained or realigned and enhanced with additional landscape features to provide better connectivity within communities and support recreational use.</li> <li>• Maintain views to landscape and features, in particular Cawston Spinney.</li> </ul> |



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|       | <ul style="list-style-type: none"> <li>The west of the site has an open landscape character surrounded by strong landscape framework of the Cawston Greenway, Cawston Spinney and mature trees which must be protected and enhanced</li> </ul> |
| NA.02 |  |

- 2.18. NA.23 and NA.24 refer to woodland buffers, it is submitted that these proposed codes are overly prescriptive particularly in relation to employment developments. There needs to be flexibility built into the standards to ensure viable schemes can come forward. In general, the thresholds set out in NA.23 and NA.24 are not supported the word must should be removed and justification needs to provided for the suggested buffers.
- 2.19. The approach with regards to ancient woodland, is not consistent with Natural England's standing advice or adopted development plan Policy DS8 and/or NE1. The buffer should be measured from the boundary of the ancient woodland, as defined by Natural England and available on the MAGIC website, as often non-ancient woodland extends further than the ancient woodland (as is the case at Cawston Spinney).
- 2.20. It is not clear on the reasons for extending the buffer zone out to 20m. In order to avoid root damage, a 15m buffer from the boundary of the ancient woodland as defined by Natural England is sufficient, and consistent with the Standing Advice.
- 2.21. There is no justification provided for this additional requirement and it is too prescriptive and is a clear attempt to introduce new policy, as stated in Section 1 above SPDs cannot introduce new policies.
- 2.22. The Standing Advice from NE states that the buffer zone should consist of semi-natural habitats such as woodland, or a mix of scrub, grassland, heathland and wetland planting. There is no evidence to suggest that a buffer in excess of 15m is required. Land can be developed beyond the 15m buffer, provided that any development does not impact upon the ability of semi-natural habitats within the buffer zone to provide appropriate screening to the woodland.
- 2.23. The proposed amendments are as follows:

| Current Wording   | Suggested amended wording in bold and strikethrough  |
|---|--|
| NA.23 Woodlands must be buffered by 15m, the ancient woodland buffer must be increased to 20m and utilised to reduced the impact of increased use to the core woodland which will be managed with 'no go' areas according to its management plan. | NA.23 Woodlands must be buffered <del>by 15m</del> , the ancient woodland buffer <b>should</b> <del>must be increased to 15m 20m</del> and utilised to reduced the impact of increased use to the core woodland which will be managed with 'no go' areas according to its management plan. |
| NA.24 Buffer widths must comply with the following minimum requirements:  | NA.24 Buffer widths must comply with the following minimum requirements:   |



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| <ul style="list-style-type: none"> <li>• Waterbodies including ponds, streams and ditches: 10m buffer</li> <li>• Woodland 15m buffer</li> <li>• Ancient woodland 20m buffer</li> <li>• Cawston Greenway: 15m buffer</li> <li>• Hedgerows: 2m buffer strip from centre of hedge.</li> </ul> | <ul style="list-style-type: none"> <li>• Waterbodies including ponds, streams and ditches: <b>up to</b> 10m buffer</li> <li>• Woodland <b>up to</b> 15m buffer</li> <li>• Ancient woodland <b>15m</b> <del>20m</del> buffer</li> <li>• Cawston Greenway: <b>up to</b> 15m buffer</li> <li>• Hedgerows: <b>up to</b> 2m buffer strip from centre of hedge.</li> </ul> |
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2.24. NA.38 which states ‘*Verges alongside routes and planting alongside PROWs must be landscaped to create safe spaces for users with good visibility and enhanced wildlife connectivity*’ needs to reflect PROW guidance which requires landscaping set back to avoid overhanging trees etc on PROW.

2.25. With regards to page 46 ‘Open Space Provision’ it is noted that these typologies and quantities reflect the adopted South West Rugby SPD however it is noted in the adopted SPD there is a facility to allow provision across the allocation. Therefore, if the employment or residential land is overproviding in one aspect of open space it should be agreed that less can be provided in the other typologies.

2.26. NA.51 requires wildlife friendly habitats within new parks and open spaces must cover at least 30% of the area, TBBD consider that this requirement is overly prescriptive. The site will already need to meet statutory BNG requirements and such an approach may contradict with what is already being required to be provided as part of a proposal:

| Current Wording   | Suggested amended wording in bold and strikethrough  |
|---|--|
| NA.51 requires Wildlife friendly habitats within new parks and open spaces must cover at least 30% of the area. | <del>NA.51 requires Wildlife friendly habitats within new parks and open spaces must cover at least 30% of the area.</del> |

2.27. With regards to the NA.59 to NA.61 again these requirements are overly prescriptive and the requirements must be looked at on a case by case basis. It is felt that this paragraph is overly prescriptive, large native trees may not necessarily be the best solution for the site as there are better establishment/growth rates for smaller planting, and that this will establish to similar levels as if more mature planting were to be provided at day 1, when the Landscape Assessment is being undertaken at Year 15 – i.e. the same result is achieved and conclusions on levels of impact reached are the same. Another issue may be that the species suggested may contradict carbon sequestering requirements as required in NA.68):

| Current Wording  | Suggested amended wording in bold and strikethrough   |
|--|---|
| NA.59 New woodland planting must favour oak as the major tree with pine and silver birch on sandy soils. | <del>NA.59 New woodland planting must favour oak as the major tree with pine and silver birch on sandy soils.</del> |
| NA.60 Existing and new areas of woodland must consist of a diverse stand structure.                      |   |



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| <p>NA.61 As a guidance woodland mixes should contain no more than:</p> <ul style="list-style-type: none"> <li>• 10% of the tree stock in the area being of one species</li> <li>• 20% of the tree stock in the area being of one genus</li> <li>• 30% of the tree stock in the area being of one family</li> </ul> | <p><del>NA.61 As a guidance woodland mixes should contain no more than:</del></p> <ul style="list-style-type: none"> <li><del>• 10% of the tree stock in the area being of one species</del></li> <li><del>• 20% of the tree stock in the area being of one genus</del></li> <li><del>• 30% of the tree stock in the area being of one family</del></li> </ul> |
| <p>NA.72 Canopy clearances must be:</p> <ul style="list-style-type: none"> <li>• Footpath/Footway: 2.4m</li> <li>• Cycleway: 3.5m</li> <li>• Carriageway: 5.2m</li> </ul>  | <p>NA.72 Canopy clearances <b>should be where feasible</b> must be:</p> <ul style="list-style-type: none"> <li>• Footpath/Footway: 2.4m</li> <li>• Cycleway: 3.5m</li> <li>• Carriageway: 5.2m</li> </ul>  |

- 2.28. In general, the landscape material palettes proposed are overly prescriptive and should be a guide only.

## PUBLIC SPACE

- 2.29. As a general comment the word 'must' is too stringent; and should be replaced with 'should where feasible'. Page 65 refers to Street Types, the codes proposed do not align with the first limb of the Potsford Dam Link (PDL which has already been constructed (the first limb comprises approximately 50% of the PDL):

| Current Wording   | Suggested amended wording in bold and strikethrough  |
|---|--|
| <p>Potsford Dam Link</p> <p>This strategic route must be classified as a category 3A primary road, designed to accommodate higher volumes of mixed traffic at faster speeds. Primary roads typically link strategic routes with urban centres and have limited frontage access.</p> | <p>Potsford Dam Link</p> <p>This strategic route <del>must</del> <b>should</b> be classified as a category 3A primary road, designed to accommodate higher volumes of mixed traffic at faster speeds. Primary roads typically link strategic routes with urban centres and have limited frontage access.</p> |
| <p>PS.57 The design of Category 3A roads must adhere to the Design Manual for Roads and Bridges (DMRB) and Warwickshire County Council (WCC) general design guidance as outlined in the Movement section.</p>   |  |
| <p>PS.58 Primary roads should have the character of a tree-lined avenue, incorporating generous landscaped verges with a rhythmic arrangement of street trees.</p>  |  |
| <p>PS.59 Footways and cycleways must be set back from the main carriageway to mitigate the impact of high traffic volumes, including heavy goods vehicles (HGVs</p>   | <p>PS.59 Footways and cycleways <del>must</del> <b>should where feasible</b> be set back from the main carriageway to mitigate the impact of high traffic volumes, including heavy goods vehicles (HGVs</p>  |



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| PS.60 Development frontage can provide a setting for the primary road, as illustrated in the section below. However, direct access must be avoided. Instead, a parallel tertiary or private drive should be provided for frontage access.  | PS.60 Development frontage can provide a setting for the primary road, as illustrated in the section below. However, direct access <del>must</del> <b>should where feasible</b> be avoided. Instead, a parallel tertiary or private drive should be provided for frontage access.        |
| Streets to employment development<br>Industrial streets will generally be category 3B secondary streets, primarily serving industrial areas where HGV traffic is more prevalent  |  |
| PS.61 These streets must provide efficient access and circulation within industrial zones, linking directly to other secondary streets or primary roads.   |  |
| PS.62 To maintain an avenue character, industrial streets must incorporate generous verges and street trees. Footways and cycleways should generally be set back from the carriageway to enhance safety and comfort for pedestrians and cyclists   | PS.62 To maintain an avenue character, industrial streets <del>must</del> <b>should where feasible</b> incorporate generous verges and street trees. Footways and cycleways should generally be set back from the carriageway to enhance safety and comfort for pedestrians and cyclists |
| PS.63 Development frontage could be: <ul style="list-style-type: none"> <li>• Set back within a landscaped area to create a buffer between industrial activities and the street, or</li> <li>• Positioned at the back of the footway where appropriate for urban integration.</li> </ul> |  |

2.30. The plans on the page 65 should be amended to reflect the widths that have been implemented on Phase 1 of the PDL e.g. 2 metre verges (not 2.5 metres), 3.5 m shared cycle and footway, to ensure consistency of provision.

2.31. In general, the hard landscape material palettes proposed are overly prescriptive and should be a guide only.

### BUILT FORM

2.32. Throughout this Section, the plans should be updated to reflect the employment allocation in the emerging plan (on the safeguarded land). This should be amended on all plans throughout this section.

2.33. For page 72 It is considered that the density of the western and northern parcels of residential land in TBBD's ownership should be amended that to reflect that of the submitted planning application on this site (albeit not determined, application ref. R22/0853) which is 45 dph and (application ref. R18/0995, which is resolved to be approved which is at 45 dph. . No justification has been given for these reduced densities which may impact on viability and marketability etc. The plan should therefore be updated to 45 dph in these areas. Again the word must should be replaced with 'should, if feasible'



- 2.34. On page 73 the plan should be updated to reflect the employment allocation in the emerging plan.
- 2.35. On pages 74 and 78, TBBDs two residential sites are located in the 'Green Fringe' area. TBBD consider that the typologies are too prescriptive; combined with proposed 30dph (which is incorrect as set out above and is strongly contested) and therefore risks the site being unviable/unmarketable. As set out above, the typologies etc are is not consistent with either the Phase 1 resolution or Phase 2 residential applications.
- 2.36. The inset plan which relates to proposed Scenario 2 employment uses does not reflect a likely layout for an employment scheme on the safeguarded land but seems to be the same layout as a residential scheme. This should be amended to show a consistent blue wash across the entirety area of this land.
- 2.37. For the employment scheme, the building heights should be assessed and agreed via an LVIA submitted with an application rather than via an overly prescriptive design code, which offers no justification for the heights proposed. An LVIA will properly assess the context in which the development sits (i.e. adjacent to the phase 1 employment development), the impacts of the heights proposed (for which logistics development has specific requirements driven by internal racking layout design), and will take into account proposed mitigation. Heights cannot be prescribed at this stage without that detailed analysis. The requirements are overly prescriptive and go above and beyond what is stated in policy DS8 which states *"Specifically regarding the employment allocation to incorporate design and landscaping measures, including structural landscaping, to mitigate the impacts on the surrounding landscape and setting of any nearby heritage and GI assets, including Thurlaston Conservation Area."*
- 2.38. In summary, proposals should be assessed on their own merits on the basis of their accompanying Landscape and Visual Impact Assessment, and therefore the heights referred to on the Design Codes should be removed or expressed as minimum heights.
- 2.39. Page 83 (Potsford Dam Link - PDL), needs to be updated to reflect the draft employment allocation now proposed in the emerging plan on the east side of the PDL. The cross section and text under BF.45 should therefore be removed.
- 2.40. It is unclear where the cross section in BF.44 is taken from and this should be clarified in a the key on the drawings. It is also considered that the text for BF.44 is too prescriptive and contradicts itself with amendments as suggested below:

| Existing Text   | Proposed amendment in bold and strikethrough   |
|---|--|
| <p>BF.44</p> <p>Proposals must present a coherent approach along the west side of the Potsford Dam link which demonstrates:</p> <ul style="list-style-type: none"> <li>• Larger distance between carriageway and dwellings, reflecting its likely use by larger vehicles including HGVs and utilising more</li> </ul> | <p>BF.44</p> <p>Proposals <del>must</del> <b>should</b> present a coherent approach along the west side of the Potsford Dam link which demonstrates:</p> <ul style="list-style-type: none"> <li>• Larger distance between carriageway and dwellings, <b>should be considered where feasible</b> reflecting its likely use by larger</li> </ul> |



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| <p>significant landscape verges to provide a positive outlook.</p> <ul style="list-style-type: none"> <li>• Sufficient overlooking and activation of active travel routes adjacent to the road (dwellings facing the movement route), especially where there is a significant distance between the route carriageway and residential development.</li> <li>• A relatively consistent, ordered frontage aligned with and facing the movement route.</li> <li>• Appropriate treatment of gateways responding to the defining characteristics of each (ie gateway onto the Sustainable Transport Corridor, with the adjacent employment buildings in mind, and gateway into the allocation at the north of the route.</li> </ul> | <p>vehicles including HGVs and utilising more significant landscape verges to provide a positive outlook.</p> <ul style="list-style-type: none"> <li>• Sufficient overlooking and activation of active travel routes adjacent to the road (dwellings facing the movement route), especially where there is a significant distance between the route carriageway and residential development.</li> <li>• A relatively consistent, ordered frontage aligned with and facing the movement route.</li> <li>• Appropriate treatment of gateways responding to the defining characteristics of each (ie gateway onto the Sustainable Transport Corridor, with the adjacent employment buildings in mind, and gateway into the allocation at the north of the route.</li> </ul> |
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- 2.41. On page 84, the plans need to be updated to reflect the employment allocation in the emerging plan (on the safeguarded land) and include the land to the east of the safeguarded land up to the woodland (which is now also allocated for employment use). This needs to result in an amendment to the inset map under BF.49, with the 'employment uses edge' now only needing relate to a small part of the safeguarded land fronting onto the proposed residential to the south.
- 2.42. Page 89 'Edge – Employment + residential edge' is relevant to the TBBD land and TBBD comment as follows: this section is overly prescriptive, introduces policies and requirements which are not in the adopted local plan policy for the site; is not clear in places; is not justified; does not take account of landscape bunding as delivered through the phase 1 employment.
- 2.43. It is submitted that this section should be deleted in its entirety as the Phase 1 scheme has delivered a site that is high quality design, sustainable and energy efficient, and will be replicated across Phase 2 , however if retained the comments below are relevant, and should be amended as set out below.
- 2.44. For the employment scheme, as stated above, the buffers should be assessed and agreed via an LVIA submitted with an application rather than via an overly prescriptive design code. An LVIA will properly assess impacts and will take into account proposed mitigation. Buffers cannot be prescribed at this stage without that detailed analysis. It is felt that the development plan policy provides sufficient guidance. The requirements are overly prescriptive and go above and beyond what is stated in policy DS8: "*Specifically regarding the employment allocation to incorporate design and landscaping measures, including structural landscaping, to mitigate the impacts on the surrounding landscape and setting of any nearby heritage and GI assets, including Thurlaston Conservation Area.*"



| Existing Text  | Proposed amendment in bold and strikethrough  |
|--|---|
| At the interface between proposed dwellings and existing employment buildings (safeguarded land scenario 1), residential schemes will be expected to provide the design response. At the interface between proposed dwellings and proposed employment buildings (safeguarded land scenario 2), proposed employment buildings will be expected to provide the design response                         |   |
| Landscape  |   |
| BF.71 A landscape buffer must be part of this edge condition and must: <ul style="list-style-type: none"> <li>• Be of minimum 80m depth between buildings.</li> <li>• Contain a screening buffer that complies with NA.25.</li> <li>• Contain some tree planting within 25m proximity of dwellings (can include street trees, likely to be provided by proposed residential development).</li> </ul> | BF.71 A landscape buffer <b>should</b> <del>must</del> be part of this edge condition and must: Provide an appropriate depth between <b>employment buildings and residential</b> buildings. <ul style="list-style-type: none"> <li>• Contain a screening buffer that complies with NA.25.</li> <li>• Contain some tree planting within 25m proximity of dwellings (can include street trees, likely to be provided by proposed residential development).</li> </ul> |
| BF.72 Overlooking must be provided onto landscape buffer.  | <del>BF.72 Overlooking must be provided onto landscape buffer.</del>  |
| BF.73 The above landscape approach must be used in combination with the below  |   |
| Building Orientation   |   |
| BF.74 The orientation of employment warehouses and the only or main orientation of residential streets and dwellings should not be parallel with or directly orientated toward each other.   | <del>BF.74 The orientation of employment warehouses and the only or main orientation of residential streets and dwellings should not be parallel with or directly orientated toward each other.</del>   |
| BF.75 Employment buildings must be orientated with short ends (rather than long sides) facing key movement routes and frontages onto residential areas.  | <del>BF.75 Employment buildings must be orientated with short ends (rather than long sides) facing key movement routes and frontages onto residential areas.</del>  |
| BF.76 Where a change in orientation is utilised and a space is created, it should also achieve other placemaking objectives, ie relate to the creation of a public space, a green space, building entrances  |   |
| Residential Streets  |   |
| BF.77 Streets must not be designed so that the key views are of employment buildings.  |   |
| Levels   |   |
| BF.78 Where present, changes in site level should be utilised as part of this edge strategy to reduce visual impact of employment buildings.   |   |



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| Understanding this should form an early part of site context analysis  |  |
| Residential Building heights   |  |
| BF.79 The height of residential buildings along this edge could be at the upper end of that permitted in order to aid transition between the different building uses and scale |  |

- 2.45. Page 90 'Edge – Employment + landscape edge' is relevant to the TBB land and TBB comment as follows: this section is overly prescriptive, introduces policies and requirements which are not in the adopted local plan policy for the site; do not take account of shape of the site and the requirement for large floorplate buildings; and are not justified; and should be amended as follows:

| Existing Text  | Proposed amendment in bold and strikethrough  |
|--|---|
| This page relates to safeguarded land scenario 2 - employment development to safeguarded land. At the interface between employment buildings and Cawston Spinney, employment buildings are expected to provide a careful response. |   |
| Landscape  |   |
| BF.80 A screening buffer that complies with NA.25 must be part of this edge condition.   |   |
| BF.81 Overlooking must be provided into landscape buffer   |   |
| Building orientation   |   |
| BF.82 Employment buildings should be orientated with short ends (rather than long sides) facing the landscape edge, especially where there are amenity uses within the buffer.   | <del>BF.82 Employment buildings should be orientated with short ends (rather than long sides) facing the landscape edge, especially where there are amenity uses within the buffer.</del>   |
| Building mass  |   |
| BF.83 Proposals should demonstrate manipulation of building mass along the landscape edge to reduce visual impact, such as stepping down of roofs, stepping back of building envelope, demonstration of human scale spaces         | <del>BF.83 Proposals should demonstrate manipulation of building mass along the landscape edge to reduce visual impact, such as stepping down of roofs, stepping back of building envelope, demonstration of human scale spaces</del> |
| BF.84 Where present changes in site level should be utilised as part of this edge strategy to reduce visual impact of employment buildings. Understanding this should form an early part of site context analysis.                 |   |

- 2.46. As a general comment in the Built Form Section for employment buildings, it needs to be recognised in this section that Phase 1 of the employment building has been built out and Phase 2 will be built out by the same developer. This should be acknowledged in the introductory text. As stated above, the proposed design and height of the buildings in the



Phase 2 employment land, will flow from the design language of the approved buildings on the existing Symmetry Park. The Phase 1 buildings are leading assets in terms of energy efficiency and sustainability. The Design Code seeks to set out a number of design characteristics, but it is not clear that the example images relate to logistics developments, or that some of the detailed comments on materials for example are proven in this sector. It is striking that there is no contextual assessment of the Phase 1 employment buildings, nor recognition of a number of design features that these already incorporate including portico entrance details, full height glazing to the offices, different materials for office/warehouse elements, and large scale windows/glazing within warehouse elevations.

- 2.47. Furthermore, many of the details on page 91 are details that should be left to be determined at reserved matters application stage. In general, the details set out below are overly restrictive and do not reflect the fact that there is an existing Phase 1 employment development on the site.
- 2.48. It is considered that this Section should be deleted in its entirety as the Phase 1 scheme has delivered a site that is high quality design, sustainable and energy efficient, and will be replicated across Phase 2 , however if retained, the following amendments are suggested for this section:

| Existing Text   | Proposed amendment in bold and strikethrough  |
|---|---|
| The scale and design of modern employment buildings can mean they have a relentless and overbearing impact on their surroundings. They often feature large expanses of blank elevation which contribute little to the spaces around them. It is important for a sufficient design approach to be taken that both mitigates the impact of these buildings on their surroundings and is not dishonest about their use   | <del>The scale and design of modern employment buildings can mean they have a relentless and overbearing impact on their surroundings.</del> <b>The scale and design of the employment buildings should where possible reflect that on the Phase 1 employment development.</b> <del>They often feature large expanses of blank elevation which contribute little to the spaces around them.</del> It is important for a sufficient design approach to be taken that both mitigates the impact of these buildings on their surroundings and is not dishonest about their use |
| BF.85 Massing should be manipulated or broken up by at least two of the following: <ul style="list-style-type: none"> <li>• Breaking particularly large buildings into several smaller buildings.</li> <li>• Use of recesses where total breaking up of buildings is not possible. Sizes, ratios, positioning and the relationship of these with the base &amp; roof will require careful design.</li> <li>• Stepping of roofs or use of roof forms which convey a sense of rhythm, order and building structure.</li> <li>• Use of a plinth to provide definition between base and upper.</li> </ul> | BF.85 Massing should be manipulated or broken up by at least two of the following: <ul style="list-style-type: none"> <li><del>• Breaking particularly large buildings into several smaller buildings.</del></li> <li>• Use of recesses where total breaking up of buildings is not possible. Sizes, ratios, positioning and the relationship of these with the base &amp; roof will require careful design.</li> <li>• <del>Stepping of roofs or</del> use of roof forms which convey a sense of rhythm, order and building structure.</li> </ul>                          |



|   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• Use of features to introduce articulation and depth including circulation cores, fenestration, service/building environment elements such as shading and use of materials</li> </ul>   | <ul style="list-style-type: none"> <li>• Use of a plinth to provide definition between base and upper.</li> <li>• Use of features to introduce articulation and depth including circulation cores, fenestration, service/building environment elements such as shading and use of materials</li> </ul>   |
| <p>BF.86 A human scale must be achieved by:</p> <ul style="list-style-type: none"> <li>• Positioning of smaller spaces (entrances, offices, amenity spaces) to be visible from most important frontage or most frequented movement route.</li> <li>• Making entrances clear, through their positioning, 'special' treatment, and emphasis on human scale of spaces.</li> <li>• Representation of smaller scale spaces (eg offices, walkways) on the exterior of the building, through organisation of building facade, representation of floor plates, utilisation of differing materials, arrangement of windows.</li> </ul> |  |
| <p>BF.87 Employment buildings must contribute to activation and overlooking of spaces by:</p> <ul style="list-style-type: none"> <li>• Clear (not significantly darkened or obscured) windows to entrances, office spaces, amenity areas.</li> <li>• Positioning of well-designed external staff amenity areas to public areas.</li> </ul>  |  |
| <p>BF.88 Opportunities should be taken to provide windows into other parts of the building, to contribute to a sense of activity and provide natural light</p>  |  |
| <p>BF.89 Opportunities for environmental measures to be integrated into building form and facade should be utilised.</p>  |  |
| <p>Parking</p>  |  |
| <p>BF.90 Parking must be sufficiently broken up with soft landscaping. Amenity spaces</p>   |  |
| <p>BF.91 Staff amenity spaces must:</p> <ul style="list-style-type: none"> <li>• Be visible from the public realm and connected to movement routes</li> <li>• Not be positioned behind parking areas</li> <li>• Integrate with the overall landscape approach to the site</li> <li>• Conveniently co-locate well-designed facilities such as cycle parking.</li> </ul>  | <p>BF.91 Staff amenity spaces <b>should be where feasible, must:</b></p> <ul style="list-style-type: none"> <li>• <del>Be visible from the public realm and</del> connected to movement routes</li> <li>• Not be positioned behind parking areas</li> <li>• Integrate with the overall landscape approach to the site</li> <li>• Conveniently co-locate well-designed facilities such as cycle parking.</li> </ul> |
| <p>Materials</p>  |  |
| <p>BF.92 Large areas or whole walls of single colour (especially grey), large format cladding should be avoided, as this creates overly flat elevations.</p>  |  |



|   |  |
|---|--|
| BF.93 Gradient approaches to elevations which attempt to replicate or blend into a landscape background (land or sky) are generally not considered to be appropriate and should not be proposed as the primary or only approach, as they do not sufficiently deal with the mass or impact of the building on surrounding areas  |  |
| BF.94 Materials/colours should be used in combination and reflect the built form to provide visual interest.  |  |
| BF.95 Proposals could include the following (non-exhaustive): <ul style="list-style-type: none"> <li>• Materials that reflect industrial or agricultural buildings, such as metals and corrugated materials</li> <li>• Reflective materials that provide some dynamism to the facade</li> <li>• Colours or materials referencing buildings in the immediate or wider context</li> <li>• The introduction of different textures</li> </ul> | BF.95 Proposals could include the following (non-exhaustive): <ul style="list-style-type: none"> <li>• Materials that reflect industrial or agricultural buildings, such as metals and corrugated materials</li> <li>• Reflective materials that provide some dynamism to the facade</li> <li>• Colours or materials referencing buildings in the immediate <b>(Phase 1 Employment Land)</b> or wider context</li> <li>• The introduction of different textures</li> </ul> |

## HOMES AND BUILDINGS

- 2.49. As set out above the word must is too prescriptive and should be amend throughout with 'Should, If feasible'.

## IDENTITY

- 2.50. As set out above the word must is too prescriptive and should be amend throughout with 'should, If feasible'.



**From:** [REDACTED]  
**Subject:** [Local Plan](#)  
**Date:** Rugby Borough Council - South West Rugby Design Code SPD Consultation  
27 February 2025 19:46:15  
**Attachments:** [Coal Authority Response 27-02-2025 194555380.pdf](#)

---



Dear South West Rugby Design Code SPD Consultation

Following receipt of your consultation on 10 February 2025, please find attached our response.

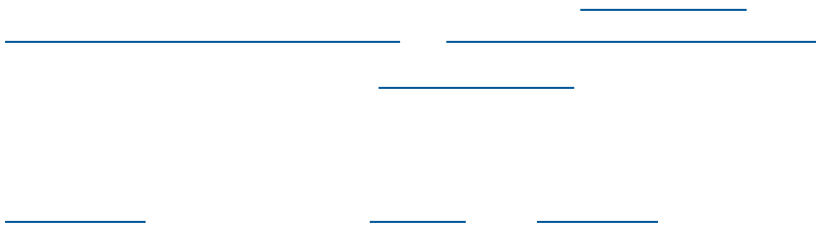
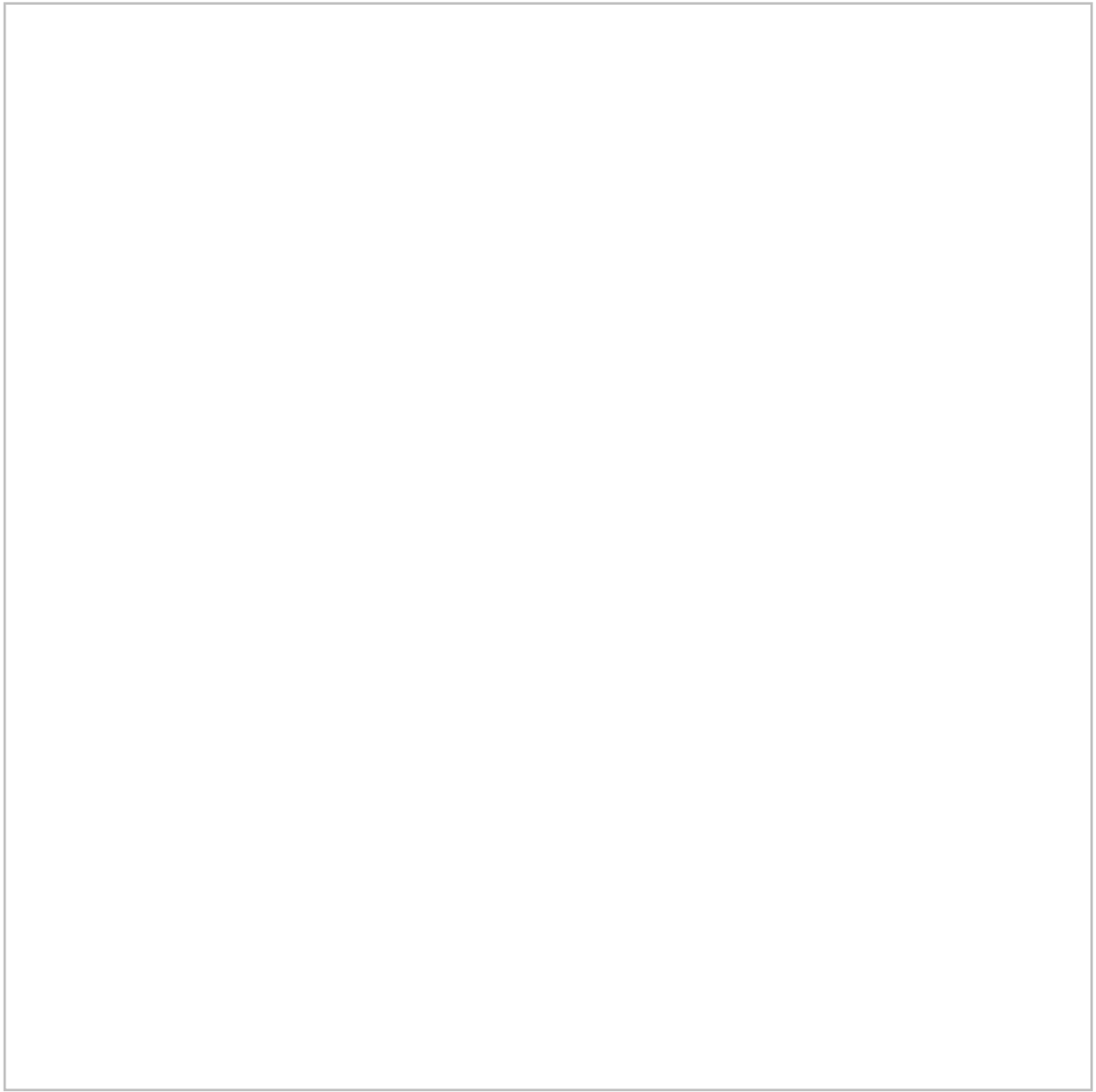
If you would like to discuss this matter further, please contact the Planning team on the number below.

Regards

The Coal Authority Planning Team

[REDACTED]







**From:** [Jane Harrison](#)  
**To:** [Local Plan](#)  
**Cc:** [David Lowe](#)  
**Subject:** South West Rugby Design Code SPD Consultation  
**Date:** 07 March 2025 10:30:11  
**Attachments:** [Outlook-ztb3opsg.png](#)  
[Outlook-kujaj1fg.jpg](#)

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OFFICIAL

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**Jane Harrison**  
**Ecologist**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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**From:** [Planning Strategy](#)  
**To:** [Local Plan](#)  
**Subject:** South West Rugby Design Code SPD Consultation  
**Date:** 11 March 2025 14:27:41

---

OFFICIAL - Sensitive

Dear Development Strategy Team,

Apologies for the delayed response, please note the following comments regarding the South West Rugby Design Code SPD Consultation. Warwickshire County Council has valued the collaborative working to date and will be happy to continue to work with Rugby Borough Council to ensure that development comes forward in a sustainable way.

Our Flood Risk Team have added:

- We are encouraged by the points included in the Nature Section whereby Sustainable Drainage Systems (SuDS) must be included in applications.
- The requirement to include SUDS in secondary street verges is also welcomed.
- We would recommend a point on watercourse crossings. Access routes over watercourses should be clear span in preference over culverts for flooding, wildlife and water quality reasons. Culverts proposed will be subject to Land Drainage Consent from the Lead Local Flood Authority.
- Could the opportunity for tree pits as a multi-purpose SuDS feature be mentioned in the Street Trees section on page 49?
- We would also like to query the design examples on page 62 whereby SUDS are included in the key but not clearly illustrated. SuDS could still be considered in this setting where the amenity grass and street trees are illustrated to provide multiple benefits.
- Permeable paving could be considered as a sustainable drainage method for private roads and driveways.

In terms of Social Care and Health, the design code should ensure that it promotes meeting requirements for disabled, elderly, families and neurodiverse people. We would encourage reference to Part M in building regulations and HAPPI principles for any housing being built for older people, as well as policies on standards for vulnerable road users.

Best wishes,

**Tabitha Stratton**  
**Graduate Planner**

[Redacted signature block]

[Redacted contact information]

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**From:** [Nisha Parekh](#)  
**To:** [Hayley Smith](#)  
**Cc:** [Karen Watkins](#); [Steve Harrison](#)  
**Subject:** Re: South West Rugby Design code - S38 feedback  
**Date:** 27 May 2025 12:08:29  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

---

OFFICIAL - Sensitive

Hi Hayley,

Sorry for the delay in sending over this information. The application for Houlton Primary has been pressing and this has held me up in regard to other work.

Please find below the comments from the S38 Team:

- Modular paving **will have**, not may have a commuted sum applied.
- HFS whether in footways or carriageways will have a commuted sum applied. It should also be noted HFS is something that will wear off very quickly as it is used, and it will cause a mess. It must also be noted as in previous comments, these roads are being designed on Greenfield Sites and should not rely on retrofit solutions such as HFS.
- Sets are never good to use in carriageways they have a very high failure rate and are difficult to repair due to the mortar which should be a high-performance resin/polymer type.
- Sets are not to be used in ramps. Increases failure rate and will if used be even more problematic when repaired due to setting time if in live traffic situations.
- In short, setts will not be accepted for adoptable areas.
- The use of modular surfacing for junctions has been interdicted by the S38 Team. It should also be noted lining does not have a good survival outlook on block paving. This can present a problem for enforcement if the lining fail.
- It is assumed the last picture on the slide is for conservation kerbs. There should be a reference to a commuted sum for their use.
- Block paving is the lesser option for modular installations due to increased maintenance issue.
- Complaints from residents are also received regarding the noise/vibration that block paving creates.
- From a maintenance point of view 'Bitmac' only is the best approach on new developments.
- The S38 Team have suggested a surface feature of a 1-2 metre 'Tegula Blocked Paved' strip with conservation kerbs either side of the block as this has the



desired effect required. This will only be accepted on tertiary streets that are a short length and will attain a maximum speed of 20mph or less.

Hope the above is clear but if you do need to discuss anything please do not hesitate to contact me.

All the best and kind regards,

[Redacted signature block]

---

**From:** Hayley Smith  
**Sent:** 27 May 2025 10:13 AM  
**To:** Nisha Parekh  
**Subject:** South West Rugby Design code - S38 feedback



Hi Nisha

Are you able to forward the S38 comments we discussed last week please? It would be useful to us to get working on them.

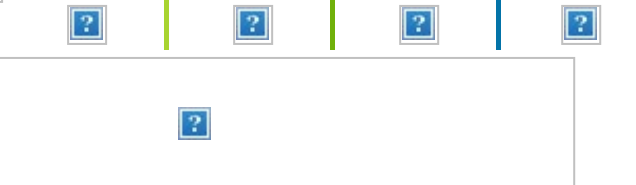
Thanks





Regards,


Hayley Smith



Tel: 01788 533741  
M: 07827818188







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## **South West Rugby Design Code SPD**

### **Response to 10 February 2025 Consultation**

Clearly a lot of work has gone into this. However there is still room for improvement.

It would help if all the maps could be indexed eg Fig 1, Map 1 etc to make referencing easier. I am going to rely on page numbers to index the maps.

### **Section 1 – Introduction, Analysis and Vision**

**Page 4.** The map is misleading as it omits the eastern arm of the South West Rugby “Sustainable Urban Extension” which is allocated to receive roughly a fifth of all the housing and one of the three primary schools proposed for the allocation. [Incidentally Warwickshire County Council must now have picked up a significant sum of section 106 monies for this primary school from the developers. When is Rugby Borough Council going to try to shame the county council into including this school in their forward education capital budget?]. The omission of the eastern arm is ironic because the original sustainability appraisal justified including Ashlawn Fields in the SW Rugby SUE because this would support master planning for the entire allocation.

It would help to explain why the eastern arm is not covered by this proposed SPD.

**Page 9.** Again the area addressed and I believe the hectarage quoted is for only one portion of the SUE.

**Page 18.** One of the sustainable transport links in the DS8 Masterplan extends to the South of the Homestead Link but this is not shown in this map. [An SPD cannot be used to rewrite a local development plan policy].

**Page 22.** One of the sustainable transport links in the DS8 Masterplan extends to the South of the Homestead Link but this is not shown in this map. DS8 also requires “a continuous Green and Blue infrastructure corridor, as part of the wider allocation, identified in the GI Policies Map, linking to adjacent networks and utilising existing and potential habitats and historic landscape, in particular between Cawston Spinney and Cock Robin Wood; ... “. The route to be taken by the Green and Blue infrastructure corridor is shown in the DS8 Masterplan and in the SW Rugby Masterplan SPD diagram of the South West Rugby Green and Blue Infrastructure Plan. The map on page 22 is in part ambiguous and in part positively misleading. The ambiguous portion is the belt of land between Boat House Spinney and the Homestead Link which is shown as open space [which clearly it must be] but fails to identify the specific role this open space must play to provide a Green and Blue infrastructure corridor. The misleading part is that in the East the entire block of land between Cock Robin Wood and the Homestead Link is shaded out as a residential allocation. We can see from the DS8 Masterplan that this is not true as a portion has been allocated as Green and Blue infrastructure [as indeed it must be to fulfil the DS8 policy].

### **Section 2. Context and Co-ordination**

No comment.

[It would have been useful if Symmetry and L&Q had followed this precept whilst developing their competing proposals for cycle routes North and South of Coventry Road, Cawston – although not as useful as RBC actually laying down the cycle route strategy in the SW Rugby Masterplan SPD.]



### **Section 3 – Movement**

**Cycling requirements (page 28)** – whilst MO.15 correctly sets a minimum width standard for footways developers are not reminded of the minimum width standards for cycle routes set out in the *Warwickshire Design Guide* viz a minimum verge width of one metre segregating cycle routes from roads and for all shared use footways/cycle routes to have a minimum width of three metres. *Local Transport Note 1/20* provides for a minimum cycle route width of 2 metres for a one way lane but this is not directly mentioned either. The draft SPD would be enhanced by highlighting these requirements alongside the minimum footway width.

**MO.18 (page 28)** “Developers must ensure: Safe, direct, and well-lit cycle routes connecting neighbourhoods to town centres\*, rail stations\*, and other key destinations”. I wonder whether the county council as the Highways Authority might also have a role to play here. The map on page 35 of draft SPD shows that currently there are not safe, direct and well-lit cycle routes connecting the Northern and Central neighbourhoods of the SUE to Rugby’s town centre and rail station. I await the first time a report from the Head of Growth and Investment to planning committee recommends that a planning application should be rejected because the developer has failed to ensure this connection.

**Page 34** The map shows a modal filter to support the East-West Sustainable Transport Link but does not show the modal filter needed to support the North-South Sustainable transport Link. This omission should be rectified.

Paragraph 19.23 of the SW Rugby Masterplan SPD states “Opening the east-west STL as a through route to all traffic would be likely to have the following undesirable implications: - It would encourage HGVs to route via the residential parcel to the east of the proposed employment allocation and other residential areas which would have detrimental environmental, road safety and amenity implications. - It would encourage traffic, including HGVs, to route via other established residential areas in Rugby via A426 Dunchurch Road which feeds onto Rugby Gyratory where there is a recognised air quality problem. - It would reduce the potential use of the Potsford Dam Link (as the key north/ south corridor through the site) and the A4071 Rugby Western Relief Road thus preventing HGVs and general traffic to avoid Rugby Gyratory where opportunities for further capacity improvements are limited”.

The road network shown on page 34 would not allow private cars or HGVs to travel the entire length of the of the east-west STL however the tertiary road shown without traffic restrictions would enable them to by-pass the modal filter and move between the Potsford Dam Link and Symmetry’s warehouses on the one hand and the allocation, Dunchurch, Rugby and its Gyratory on the other. This creates a rat run and negates some of the argument for establishing an East-West STL in the first place. Either the tertiary road should not be allowed to continue all the way from the Potsford Dam Link to the East-West STL or it too should have a modal filter.

**Page 35.** Unfortunately the map illustrates an idyllic Rugby which does not exist. You cannot transition between Northampton Lane and the Cawston Greenway by the A45 as shown in the map. [Or rather you can but it involves both trespass and scrambling down a steep railway embankment]. I have frequently suggested that the position shown on the map be achieved in reality, including in my comments on R16/2569, but sadly my proposals have never been taken up by councillors. It would be good if the draft SPD were to include this possibility as a desirable outcome but given that the employment site has achieved planning permission I am not sure what levers RBC could now bring to bear to make it happen.



**Page 36.** This map fails to show the extension of the STL South of the Homestead Link as shown in the DS8 Masterplan.

#### **Section 4 – Nature**

Three general points. There are numerous occasions in this section where the wording clashes with the local development plan policy SDC2 “... All proposals should ensure that ... New planting comprises native species which are of ecological value appropriate to the area...”. An SPD cannot rewrite a local development plan.

Whilst DS8 requires a Green and Blue Infrastructure corridor to run across the allocation this section does not repeat the local development plan policy NE2 requirement “ ...Where appropriate new developments must provide suitable Green and Blue Infrastructure corridors throughout the development and link into adjacent strategic and local Green and Blue Infrastructure networks or assets where present. Where such provision is made a framework plan should be produced as part of the planning application demonstrating the contribution to the overall achievements of the multi-functional strategic Green and Blue Infrastructure network ...”.

RBC failed to conduct an ecological analysis of this area before designating it as a “Sustainable Urban Extension”. Where I comment below on species which are present and not present in the area I am drawing on my own observations, the patchy and sometimes incorrect ecological/aboticultural assessments submitted by developers and various studies of Cawston Spinney.

**Page 41.** The map repeats the problem previously encountered with the map on page 22. Whilst there is a reference to movement corridors inspection reveals that it is only human movement that is addressed. I believe that an introductory map to a nature section should also show the Green and Blue infrastructure corridor required by DS8.

**Page 42.** NA 06. Worldwide there are over one hundred *Pinus* species. However none of them are native to England. The one oak which is local to Rugby is *Quercus robur* and the species of birch which the Warwickshire Landscape Guidelines recommends as a major component of new woodland planting in the Dunsmore area is Silver Birch. Therefore NA 06 should read “New woodland planting should favour English Oak as a major tree species alongside Silver Birch”.

**Page 44.** NA 29 is far too permissive. It does not reflect the strength of the existing DS8 policy “... Development proposals shall respect and maintain a physical and visual separation between Rugby town and Dunchurch to prevent coalescence and protect their individual character and identity ...”. It should be strengthened. A strengthened NA 29 might read something like “Development abutting Bilton should incorporate distinctive landscape features along the parish boundary to maintain the physical and visual distinction between Rugby and Dunchurch”.

**Page 45.** A belt of land around the proposed Homestead Link is shown in turquoise. However this colouring is not included in the key. Perhaps it should be labelled “Proposed Green and Blue Infrastructure Corridor linking Cawston Spinney with Cock Robin Wood”.

**Page 46.** The description of Parks and Gardens does not align with Rugby’s Green Space Strategy which at page 11 defines Parks and Gardens as “These particular sites would normally contain a whole range of quality facilities and experiences for all members of the public. These can be classed as the Borough’s main parks and would allow the visitor to spend several hours enjoying the open space environment. An example would be Caldecott Park or Hillmorton Recreation Ground”. Not all urban parks would have a sufficient range of facilities to engage the visitor for several hours. Squares clearly do not meet the cut. [The 2011 local development plan used to have an allowance for civic



space which might include squares but sadly this was axed in the 2019 local development plan.] The standard adopted in Rugby's Green Space Strategy should be used instead of the current wording in the draft SPD.

**Page 48.** The requirement to consider non-native species in NA.58 directly contradicts local development plan policy SDC2 and should be removed. An SPD cannot rewrite a local development plan.

**Page 49.** NA.61 seems overly restrictive. I am reasonably certain that naturally occurring pioneer woodland in this area could contain far more than 10% Silver Birch. I suspect, but see no way of proving [beyond an experiment significantly outlasting even the youngest currently Rugby resident], that if there were to be such a thing as naturally occurring 'climax' woodland in our area it would have more than 10% English Oak.

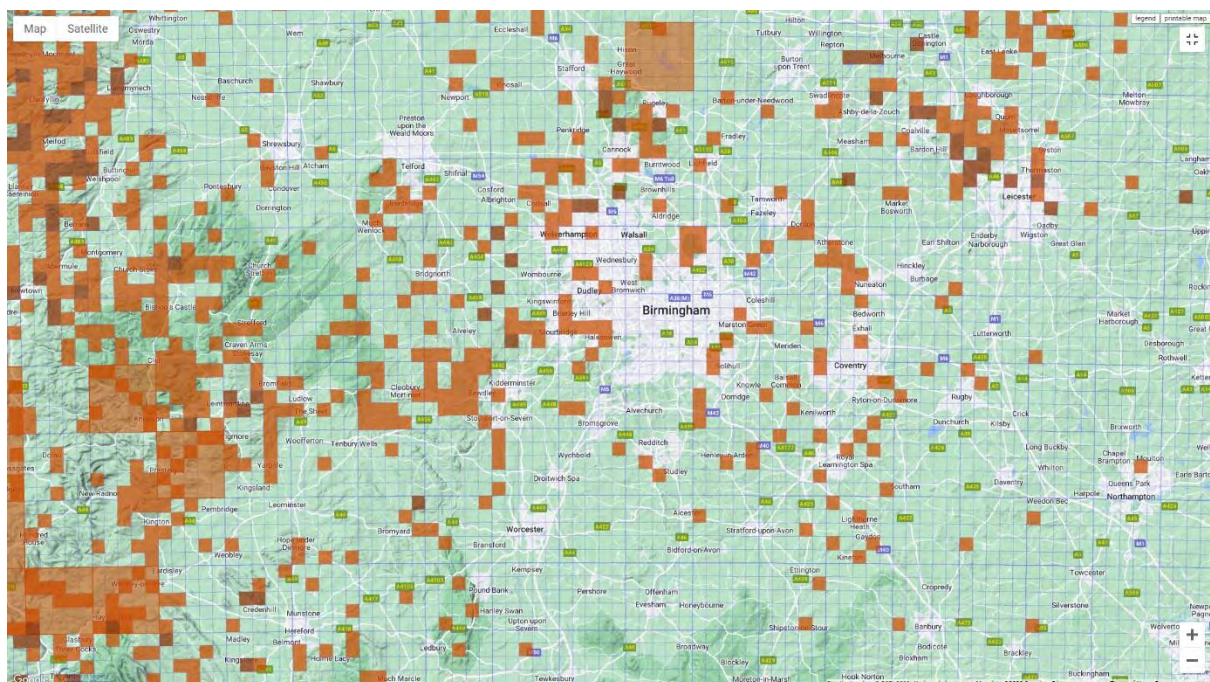
NA.69 contradicts SDC2 and it would be far better to remind developers of the requirements of the local development plan viz "It should be ensured that new planting comprises native species which are of ecological value appropriate to the area". The local development plan policy could be fleshed out by a reference to selecting for climatic resilience. [Incidentally there is no such category as "near-native". Vascular plants fall into just four exclusive categories: native, neontative, archaeophyte and neophyte.]

## Species selections

### Public Open Space Trees

*Pinus sylvestris* is **not** native to England.

*Quercus petraea* is not found in the local area. It is only rarely recorded in the wider Rugby area – see Midlands distribution map. Bagnall's 1890 flora of Warwickshire described it as local or rare and had no sites in Rugby for it. Generally *Quercus petraea* is found to the North and West of Rugby within the British Isles. As these areas have cooler and wetter summers than Rugby the ability of *Quercus petraea* to withstand the hotter drier summers that are coming has to be questioned.





In contrast *Corylus avellana* and *Malus sylvestris* are to be found locally and were likely here before modern times, they are both native to England. Why are they not included in the list of trees suitable for public open spaces?

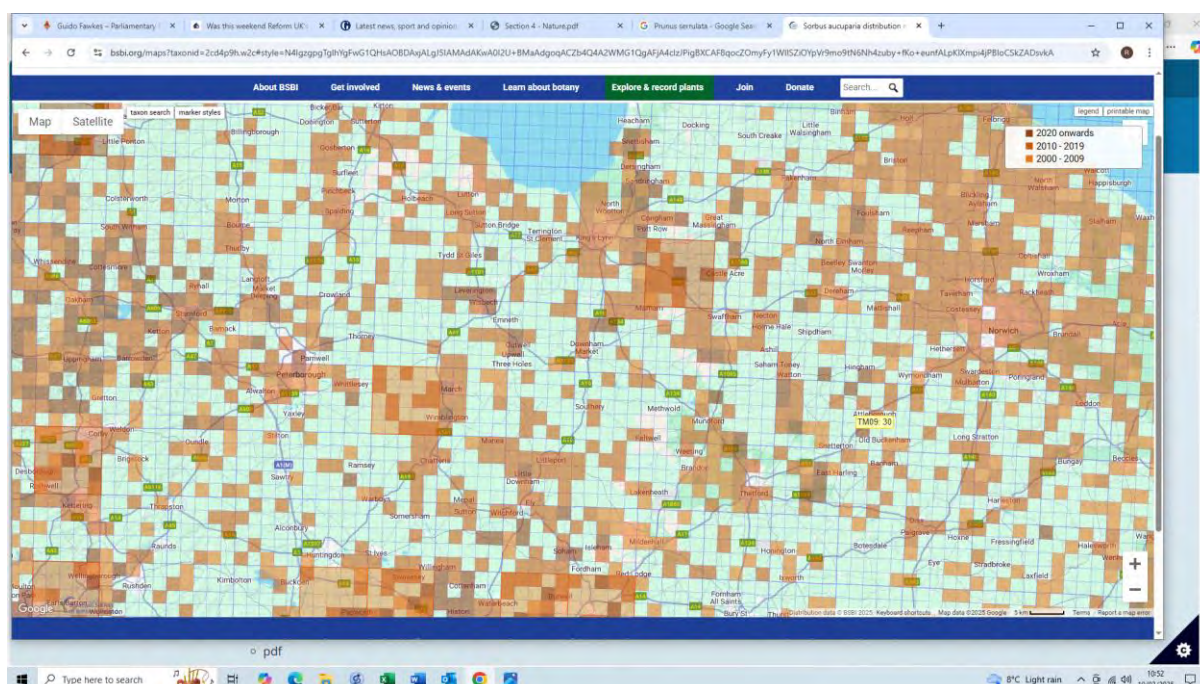
## Street Trees

*Amelanchia arboria* is native to the USA but **not** to England.

*Prunus pandora* is thought to derive from *Prunus serrulata* which is native to SE Asia but **not** to England.

*Prunus X hillieri* and *Sorbus X arnoldiana* are hybrids and neither native nor neonative.

*Sorbus aucuparia* is only identified in the woods and hedges of the area once. I have looked for it in its specified location but failed to find it. It is clearly not a common “natively” occurring tree in this area. Whilst widely planted its “naturally” occurring area is generally like *Quercus petraea* to the North and West of Rugby. These areas experience cooler wetter summers and again like *Quercus petraea* its ability to withstand the hotter drier summers that are coming is to be doubted. As the attached distribution map shows it is completely absent from much of the Breckland whose current climate we can expect Rugby to emulate in future years.



Some of the planting will take place alongside water courses and ponds which are likely to provide moist habitats even in the dryer summers which are coming. The absence of a recommendation for *Alnus glutinosa* in these locations is a surprising omission from this draft SPD.

## Page 50

I suspect that the only “Ancient” hedges in the area are those flanking the Northampton Lane by-way.

The eighteenth century farmers who enclosed the area do not seem to have worked to a seven species rule. I suspect what they planted was either hawthorn or a hawthorn/blackthorn mix



with oak and ash as standards. I wonder if seven species mix hedges will look quite different from the landscape we currently see.

### Hedges

Somewhat surprisingly *Cornus sanguinea* was not found once amongst the 18 agricultural hedges surveyed by Homes England for their Homestead Link proposal. However *Ilex aquifolium* was found in 31% of those hedges and *Sambucus nigra* in 22%. Both these species should be included in the list of acceptable hedge species.

### Scrub

I question the inclusion of *Cornus sanguinea* in this list.

In the *Warwickshire Landscape Guidelines* Rendell refers to the recent heathland nature of this area [heather is recorded persisting into Victorian times]. Rendell challenges highway engineers to recreate heathland surrounding new roads to acknowledge the history of the site. As we have seen Homes England's Homestead Link proposal totally flunked this opportunity. One remaining relic of the former heathland is the gorse still to be found on the margins of hedges.

*Ulex europaeus* should be included in the list of desirable scrub species.



*Gorse growing alongside the R169c bridleway. October 2022.*

### Page 51

NA.86 – making use of seed derived from the Draycote SSI is a very good idea.



## **Section 5 – Public spaces**

### **Page 62**

This is the first mention of *Prunus umineko* which comes from Japan. It is **not** native to England. *Sorbus X arnoldiana* is a hybrid and neither native nor neo-native. I have expressed my reservations about *Sorbus aucuparia* in my comments on Section 4 above.

### **Page 64**

The list of appropriate street trees on page 49 includes five native species of which at least three viz *Betula pendula*, *Acer campestre* and *Crataegus monogyna* clearly meet the SDC2 criteria. Why then does the draft SPD seek to promote one tree from the Americas, one tree from SE Asia and a hybrid in preference to our local trees? PS.53 should be re-written to make it comply with SDC2.

## **Section 6 – Built Form**

### **Page 72**

The map does not allow for the necessary Blue and Green Infrastructure Corridor linking Cawston Spiney and Cock Robin Wood. See previous comments on this subject.

### **Page 73**

The map does not allow for the necessary Blue and Green Infrastructure Corridor linking Cawston Spiney and Cock Robin Wood. See previous comments on this subject.

### **Page 74**

The map does not allow for the necessary Blue and Green Infrastructure Corridor linking Cawston Spiney and Cock Robin Wood. See previous comments on this subject.

### **Page 76**

Interesting to see good practice from Cambridge here and elsewhere. A shame the draft SPD does not mention Cambridge City Council's approach of ensuring that infrastructure is provided before the homes are occupied.

### **Page 82**

The use of the definite article before Sustainable Transport Corridor is incorrect as the DS8 Masterplan provides for not one but two sustainable transport corridors. See earlier comments on this topic.

### **Page 83**

“employemtdevelopment” ???

### **Page 84**

The map does not allow for the necessary Blue and Green Infrastructure Corridor linking Cawston Spiney and Cock Robin Wood. See previous comments on this subject.



## **Page 86**

This illustrates how “Bilton Parkland” should about “parkland” – which I strongly suspect is likely to be mainly SUDs represented by the developer as semi-natural open space.

What is lacking is an illustration of how Bilton Parkland should address the Bilton parish boundary in accordance with DS8.

## **Page 87**

Given the lipservice paid to active transport and that Cawston Lane should be a key movement axis for people travelling from the North of the “Sustainable Urban Extension” to the district centre and school it is a great shame that the illustration does not show cycles as well as cars to demonstrate how this movement is supposed to relate to the built form.

## **Page 91**

It is regrettable that this advice was not available to the planning committee when R16/2569 and subsequent applications were determined.

## **Page 92**

It is regrettable that this advice was not available to the planning committee when R16/2569 and subsequent applications were determined.

## **Section 7 – Homes and Buildings**

No comments.

## **Section 8 – Identity**

## **Page 100**

Personally I would add balconies to the ID.22 restriction. If they are not to be functional they should be omitted.

## **Appendix 1 – Landscape to routes and streets**

Within this section there are multiple references under ‘tertiary’ to *Sorbus x arnoldiana* and *Prunus umineko* [neither of which are native] and to *Sorbus aucuparia*. I commented on the undesirability of *Sorbus aucuparia* in my comments on page 49. It is not clear to me why trees which do not conform to SDC2 are being promoted rather than *Betula pendula*, *Acer campestre* and *Crataegus monogyna* which do.

Also within this section there are multiple references under ‘minor’ to *Amelanchia arboria* a native of the USA but not of England, *Prunus pandora* which is thought to derive from *Prunus serrulata* which is native to SE Asia but not of England and to the hybrid *Prunus x hillieri*. Again . it is not clear to me why trees which do not conform to SDC2 are being promoted rather than *Betula pendula*, *Acer campestre* and *Crataegus monogyna* which do.

## **Notes**

[\* I believe there is only one town centre and one rail station within five miles of the SW Rugby “Sustainable Urban Extension”.]



[REDACTED]

[REDACTED]

[REDACTED]



**MOVEMENT**



# MOVEMENT

## Introduction

### Purpose

This chapter provides essential guidance for developers and designers planning and delivering street infrastructure in South West Rugby. Warwickshire County Council (WCC) has been a key stakeholder in the development of this work and the code promotes a people-centric approach to movement and street design. It aligns with placemaking principles, prioritising road safety, sustainable transport, and creating environments that enhance the quality of public spaces.

The code applies to:

- Highway infrastructure and streets to be adopted by WCC.
- Non-adopted elements, such as private drives, with recommendations to ensure consistency.

Developers must refer to this guidance in conjunction with:

- Warwickshire Design Guide (WDG)
- Manual for Streets 1 & 2 (MfS)
- Local Transport Note 1/20 (LTN1/20)
- National Model Design Code (NMDC)

### Vision

The vision for South West Rugby’s transport network is to create a low-carbon, resilient, and inclusive system that:

- Supports health, well-being, and quality of life.
- Promotes connectivity, accessibility, and sustainable mobility.
- Fosters a thriving economy through efficient movement networks.
- Enhances Rugby’s unique natural and built environment

### Structure

The Movement section contains the following information:

- Street network: characteristics, connectivity principles, and street hierarchy guidance.
- Movement framework: design of movement routes, including active travel, bus routes, and service corridors.
- Related movement guidance: parking, mobility hubs, emergency access, and refuse collection.

The Public Spaces section contains the following information:

- Street coding: specifications and design for various street types.

Also refer to:

Public spaces

RBC local plan policy: DS8, DS9, HS1, HS5, D1 + South West Rugby Masterplan SPD (2021, updated 2024)

WCC policy: Warwickshire Design Guide

\*plus others outlined above



MOVEMENT

Street network

Street characteristics

The street network is the foundation of public life, supporting movement, placemaking, and access. According to the NMDC, a connected network of streets, public transport access, and prioritization of walking and cycling are essential for all developments.

- MO.01 All schemes **must** contribute to an integrated, walkable, and safe street network.
- MO.02 Streets **must** balance their link function (movement of people and goods) with their place function (public spaces supporting social and economic activities).
- MO.03 Development **must** reflect and enhance the character of the street it occupies. The street’s character will vary based on its hierarchy and local context.
- MO.04 High-quality public spaces **must** have thoughtful street design and well-proportioned enclosures formed by surrounding buildings.

| Public Space  |  |  |   |  |
|---|--|--|---|--|
|   | Town centres                                 | Urban neighbourhoods                           | Suburbs                                       |  |
| Primary streets:<br>Designed to take through traffic and public transport. See P1.3.1 Primary Streets.  | Enclosure Ratio: 1:2<br>Active Frontage: 30% | Enclosure Ratio: 1:2<br>Active Frontage: 10%   | Enclosure Ratio: 1:6<br>Active Frontage: 10%  |  |
| High streets:<br>The focus for local shopping centres, often with public buildings. See P1.3.2 Primary Streets.   | Enclosure Ratio: 1:1<br>Active Frontage: 80% | Enclosure Ratio: 1:1.5<br>Active Frontage: 70% | Enclosure Ratio: 1:3<br>Active Frontage: 60%  |  |
| Secondary streets:<br>Taking local traffic into neighbourhoods and often the location of shopping parades and local services such as shops. See P1.3.3 Local and Secondary Streets. | Enclosure Ratio: 1:1<br>Active Frontage: 50% | Enclosure Ratio: 1:1<br>Active Frontage: 30%   | Enclosure Ratio: 1:1<br>Active Frontage: 20%  |  |
| Local streets:<br>Providing vehicle access only to the properties on the street but with through pedestrian and cycle traffic. See P1.3.4 Local and Secondary Streets.              | Enclosure Ratio: 1:1<br>Active Frontage: 30% | Enclosure Ratio: 1:1<br>Active Frontage: 10%   | Enclosure Ratio: 1:1.5<br>Active Frontage: 0% |  |

Also refer to:

Public spaces  
Built form

RBC local plan policy: HS1+ South West Rugby Masterplan SPD (2021, updated 2024)

Warwickshire Design Guide

Connected network

A well-connected street network forms the circulatory system of any settlement, determining how safely and efficiently people and goods move within and beyond a development.

- MO.05 Long-term framework: The street network **must** provide a durable and adaptable structure, often outlasting the buildings it serves.
- MO.06 Choice and variety: Streets **must** offer direct, efficient routes to make walking and cycling more attractive while promoting activity and safety.
- MO.07 Controlled permeability: Cul-de-sacs **should** be limited to tertiary streets. Measures like modal filters **should** be utilised to restrict vehicular through-traffic while maintaining access for pedestrians and cyclists.
- MO.08 Safety and security: Designers **must** consider passive surveillance, good lighting, and active street-level uses to ensure safety, particularly in areas with high footfall.

Public transport integration

- MO.09 Access to public transport **must** be prioritised to reduce reliance on private cars.
- MO.10 Developments **must** provide connected networks with safe, convenient, and accessible links to transport hubs, enabling residents to reach schools, town centres, and employment areas efficiently.

Case study: Poundbury, Dorchester

Poundbury exemplifies a well considered street network. It includes three distinct east west routes: a distributor greenway for through traffic, an urban street serving the main centre, and a pedestrian friendly ceremonial spine. Smaller, interconnected streets provide continuity and ease of movement, especially for pedestrians.





# MOVEMENT

## Street network - User requirements

### Accessibility and movement

**MO.11** Well-designed streets **must** be accessible and inclusive, catering to all users regardless of age, ability, or mode of travel.

**MO.12** Active travel: Walking and cycling **should** be prioritised as primary modes for local journeys under five miles.

**MO.13** User hierarchy: Streets **must** consider pedestrians and cyclists first, followed by public transport, servicing vehicles, and finally private vehicles.

**MO.14** Accessibility **must** be a golden thread throughout the design process, integrating features like adequate footway widths, inclusive crossings, and careful placement of street furniture.

### Walking and pedestrian needs

**MO.15** Footways **must** be at least 2 meters wide, free from obstructions, and separated from carriageways with conventional kerbs.

**MO.16** Crossovers **must** be minimal to avoid challenges for wheelchair users and individuals with mobility impairments.

**MO.17** Streets near schools, shops, and community hubs **must** cater to vulnerable users with enhanced safety measures, such as access restriction, traffic management, parking control and active travel infrastructure.

### Cycling requirements

**MO.18** Developers **must** ensure:

- Safe, direct, and well-lit cycle routes connecting neighbourhoods to town centres, rail stations, and other key destinations.
- The adoption of cycle-friendly streets within developments. Where traffic speeds are higher, segregated cycle lanes designed to LTN1/20 standards may be required.

### Bus transit

**MO.19** Developments **must** provide bus stops within 400 meters of all dwellings (distance considering route options and not the distance 'as the crow flies').

**MO.20** Bus stops **should** include shelters, seating, real-time information displays, and integration with mobility hubs.

### Servicing and emergency access

**MO.21** Developers **must** ensure efficient servicing, including HGV access and refuse collection.

**MO.22** Emergency services **must** have unobstructed access to all properties.

### Private vehicles

**MO.23** Streets **should** strike a balance between promoting sustainable transport and managing vehicle access.

**MO.24** Modal filters and traffic-calming measures **must** reduce car dominance without compromising necessary access.

### Junction design

**MO.25** Junctions **must** prioritise safety, convenience, and accessibility for all users.

**MO.26** T-junctions **should** be the default intersection type, while roundabouts and traffic signals **should** be limited to primary and secondary streets.

### Crossings

**MO.27** Formal crossings **must** align with pedestrian and cyclist desire lines to reduce risks and encourage use.

**MO.28** Drop kerb crossings **should** be placed every 100 meters to improve pedestrian permeability.



Infographic illustrating sustainable transport elements start at home and local street



Nansledan Newquay - walking comfort at side streets



# MOVEMENT

## Street network

### Street hierarchy

The design of a street network plays a fundamental role in shaping how streets are used, perceived, and experienced. Streets perform different roles depending on their movement function (the volume and type of users they serve), place function (how they support social and economic activity), and the surrounding context. These roles are further influenced by built form, land uses, and the design of the street space, including natural features, landscaping, lighting, and wayfinding elements.

### Street categorisation

To create clarity and consistency in design, this code categorizes streets into defined street types, each with a distinct function that reflects both movement and place priorities. Street type classification must consider the area type, the range of modes it serves (walking, cycling, public transport, and motor vehicles), and its specific design requirements.

The hierarchy aligns with the Manual for Streets (MfS), which defines common street types and functions. These include multifunctional streets and spaces, arterial routes, high streets, boulevards, and residential streets. Each type has unique characteristics tailored to its role in the network. The street hierarchy described below integrates these established types with additional classifications to meet the specific needs of South West Rugby.

### Junctions and Intersections

- MO.29** T-junctions **must** form most intersections within the development to maximise safety and clarity for users.
- MO.30** Crossroads generally **should** not be used due to safety concerns, as raised by WCC.
- MO.31** Higher-order junctions, such as roundabouts or traffic signals, **must** be reserved for primary and secondary streets only, ensuring that traffic flow and safety considerations are balanced at key intersections.

### Primary Street (Cat 3A)

#### Role

Provides high-capacity links to urban centres and the wider strategic road network.

#### Characteristics

- Limited or no frontage access to prioritize movement efficiency.
- Designed to accommodate higher traffic volumes, including public transport.

### Secondary Street (Cat 3b)

#### Role

Acts as the main local connector, providing essential links between primary streets and tertiary streets. These streets form the backbone of SW Rugby’s development.

#### Characteristics

- Mixed-traffic design accommodating buses, HGVs, and general traffic.
- Frequent junctions with tertiary streets to improve connectivity.
- Streets must be continuous and connected at a minimum of two points to the external highway network to provide flexibility in traffic routing.
- All developments must ensure proximity to secondary streets, enabling 400-meter maximum walking distance to bus stops for all dwellings.

### Tertiary Street 1 (Cat 4a)

#### Role

Provides local access to residential properties and links primary or secondary streets.

#### Characteristics

- Direct frontage access to properties.
- Frequent junctions to support permeability.
- These streets should connect to other streets at both ends wherever feasible.

### Tertiary Street 2 (Cat 4b)

#### Role

Smaller-scale streets, typically serving as cul-de-sacs or minor local access routes.

#### Characteristics

- Limited connectivity, designed for localized movement and access.

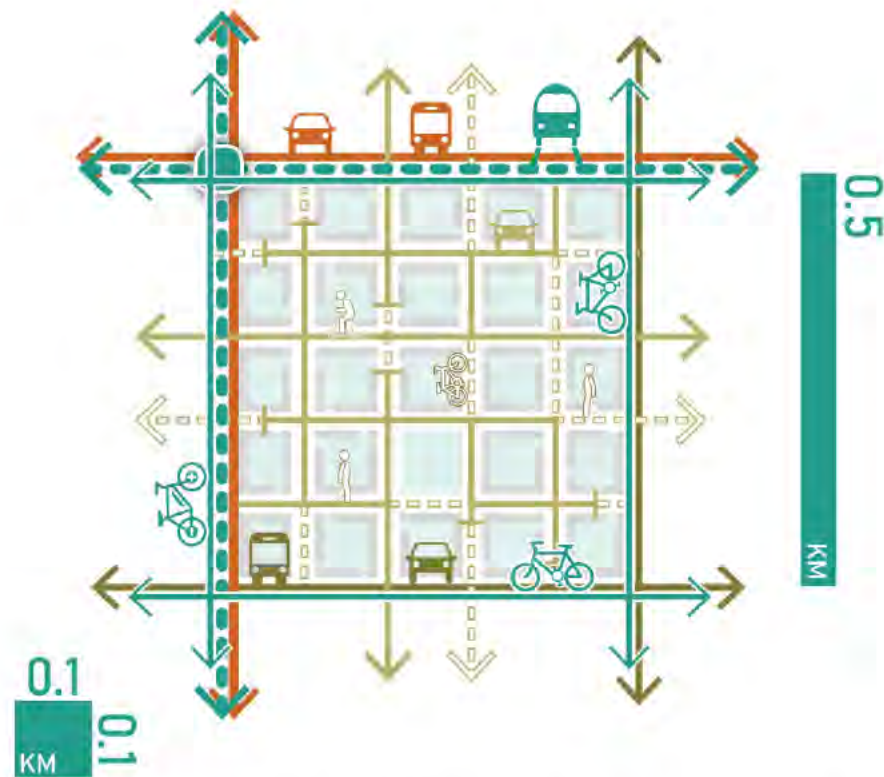


# MOVEMENT

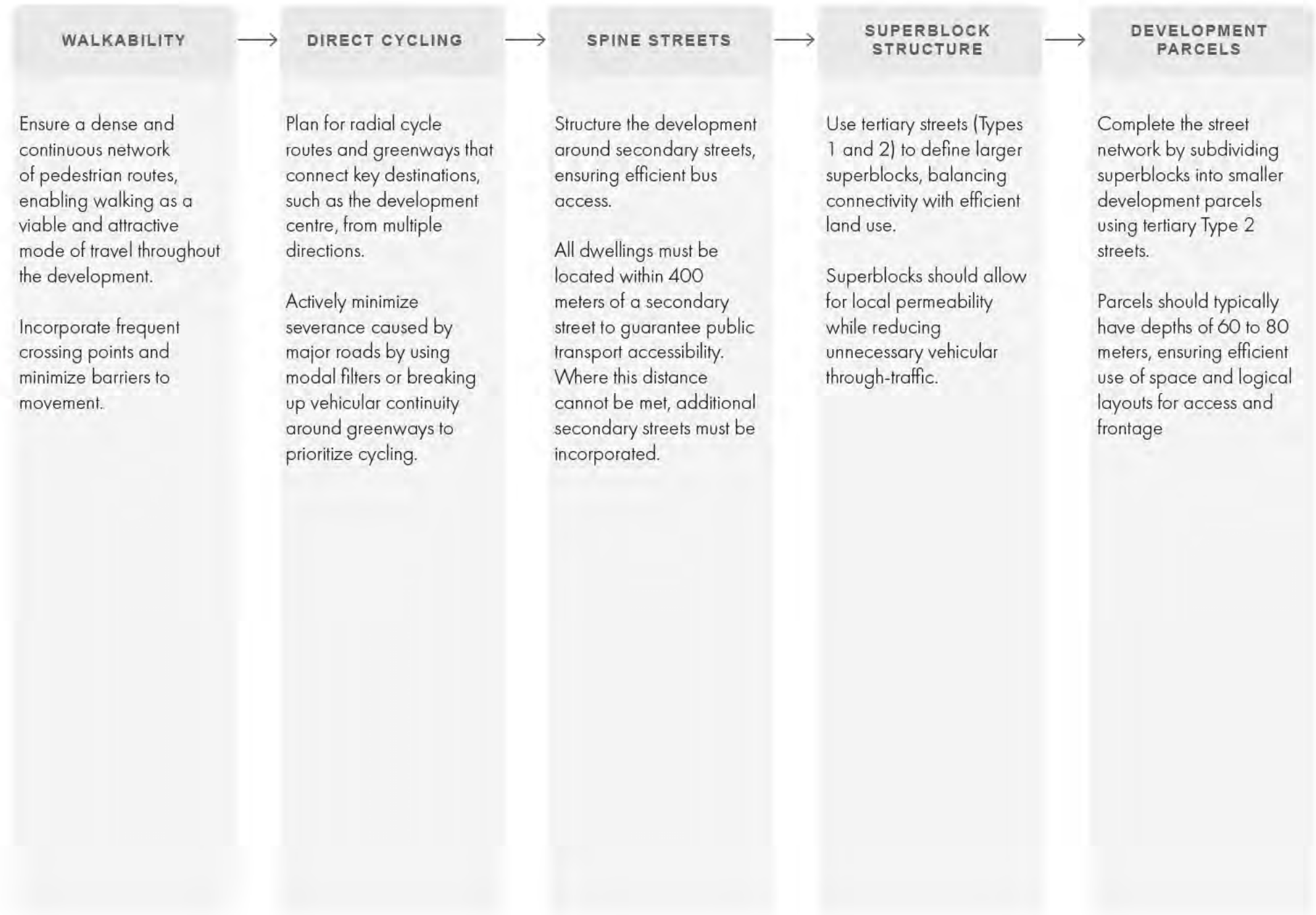
## Street network - Principles

The following principles underpin the development of a well-structured, efficient, and accessible street network for South West Rugby.

**MO.32** Developers **must** adhere to these principles in the design and implementation of street layouts:



Infographic showing principles of modal networks (eg fine grain walking, cycle anywhere via model filters, structuring spines streets & tertiaries creating blocks)





# MOVEMENT

## Street network - Case study network example

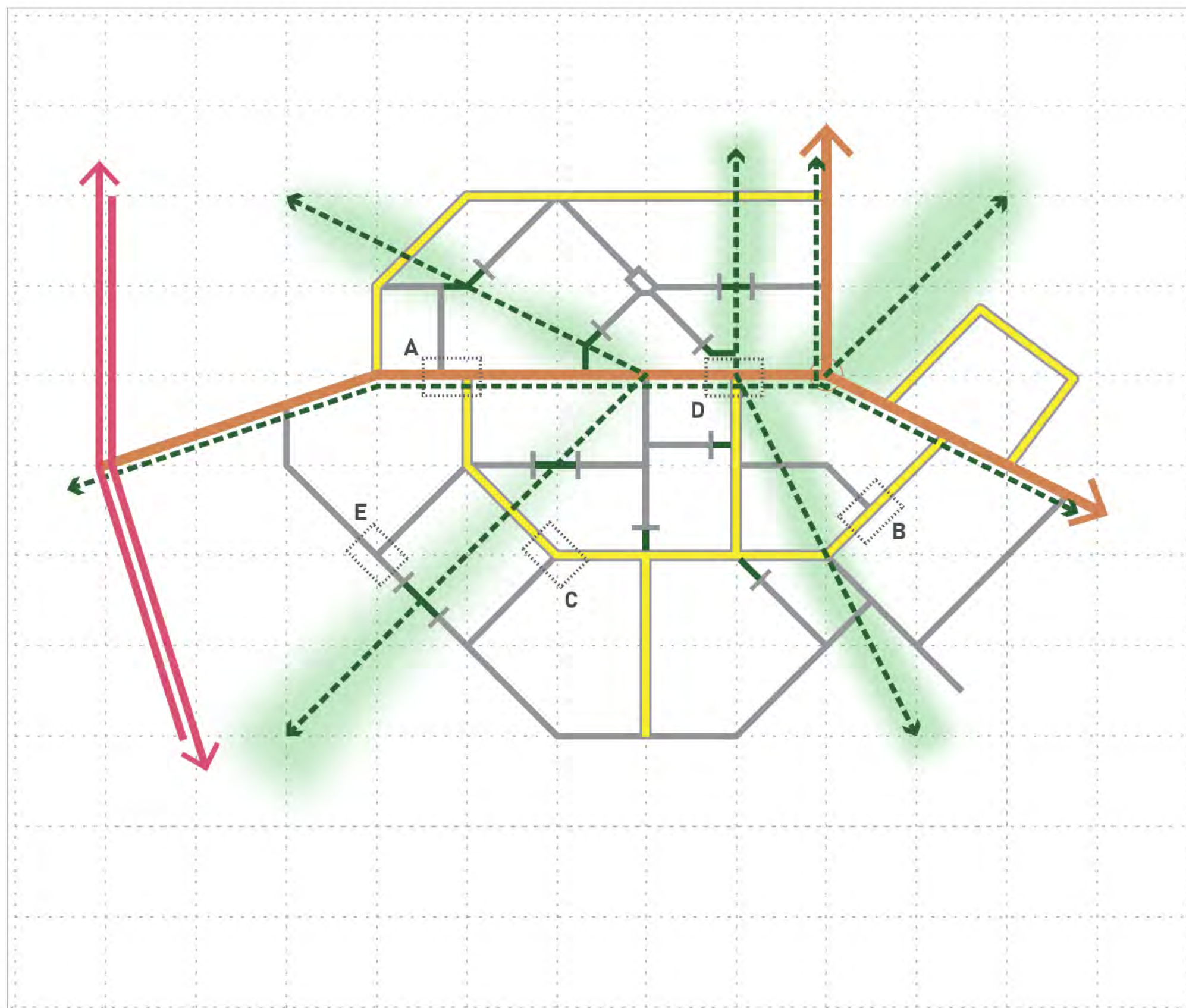
An idealised street network for South West Rugby demonstrates these principles in action:

**Walk-anywhere approach:** A grid-like pattern of walking routes ensures continuous, safe, and convenient pedestrian access throughout the development.

**Radial cycling routes:** Dedicated cycle greenways link neighbourhoods to central areas while avoiding severance by prioritising crossings and modal filters.

**Secondary spine streets:** The network prioritises public transport by using secondary streets to create direct, efficient routes for buses and ensuring maximum walking distances to stops are within 400 meters (distance considering route options and not the distance 'as the crow flies').

**Superblocks and parcels:** Larger superblocks are structured with tertiary T1 streets to create manageable, walkable neighbourhoods. Smaller Tertiary Type 2 streets define development parcels within the superblocks, ensuring effective land use.



### Key

|  |                           |  |  |
|--|---------------------------|--|--|
|  | Primary road (cat 3a)     |  | Active travel greenway route                                   |
|  | Secondary street (cat 3b) |  | Modal filter   |
|  | Tertiary street (cat 4a)  |  | Active travel connection                                       |
|  | Tertiary street (cat 4b)  |  | See street coding in Public Spaces for detailed sample layouts |



# MOVEMENT

## Street network - Network speed reduction

### Secondary Street Corridor







Managing traffic speeds is a critical design consideration for fostering safe, accessible, and functional environments.

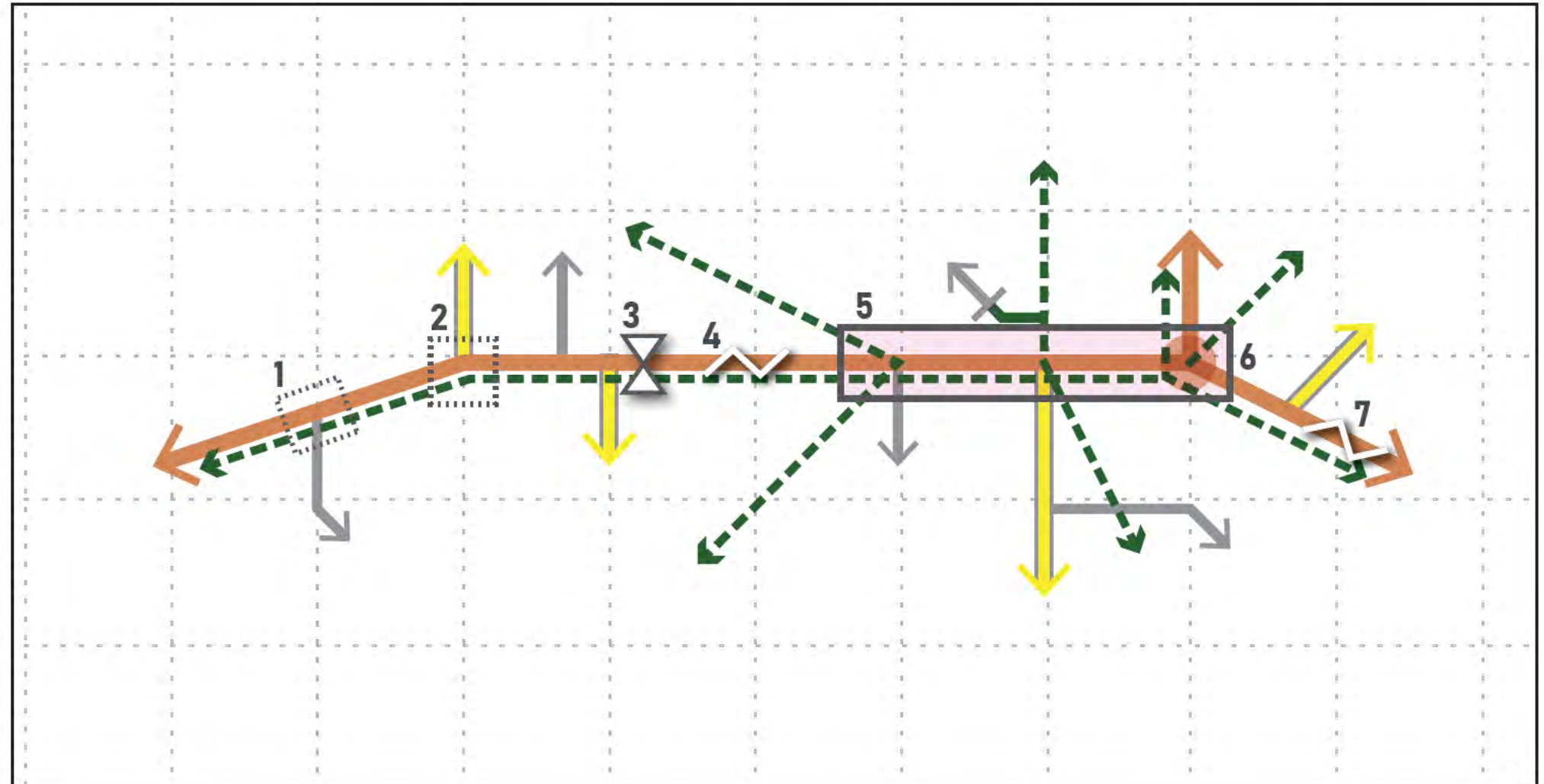
**MO.33** Designers **must** address this during the street network planning stages, applying diverse techniques to ensure traffic flow aligns with the network's intended use—typically 20 mph for general secondary streets or 30 mph for streets with bus routes.

**MO.34** For Secondary (type 3B) streets, the following strategies exemplify effective methods to manage speed while enhancing urban design and **should** be implemented:

1. Gateway junctions: Leverage junction types and the strategic placement of landmark buildings to encourage reduced speeds by signalling transitions in the street hierarchy.
2. Change of direction: Integrate junctions or bends that naturally slow vehicles while emphasizing urban form to reinforce the reduced-speed environment.
3. Priority give-and-take: Implement priority working to alternate traffic flows, favouring outbound traffic while creating localised resistance for inbound movement.
4. Chicanes: Use horizontal deflections or staggered lanes to slow traffic effectively while maintaining visual interest and functional connectivity.
5. Urban context: Embed mixed-use, higher-density developments at central nodes to emphasise pedestrian priority and encourage slower vehicular speeds.
6. Dutch-style roundabouts: Introduce tight entry and exit geometries at roundabouts to reduce speeds while improving safety and efficiency for all users.
7. Gateway chicanes: Repeated chicanes can create a rhythmic speed control effect in key areas.

### Key

|  |                           |   |                              |
|--|---------------------------|---|------------------------------|
|  | Secondary street (cat 3b) |  | Active travel greenway route |
|  | Tertiary street (cat 4a)  |  | Modal filter                 |
|  | Tertiary street (cat 4b)  |  | Active travel connection     |



Hennef Germany - flush median used on main street



Nansledan Newquay - change of street alignment with island to slow traffic



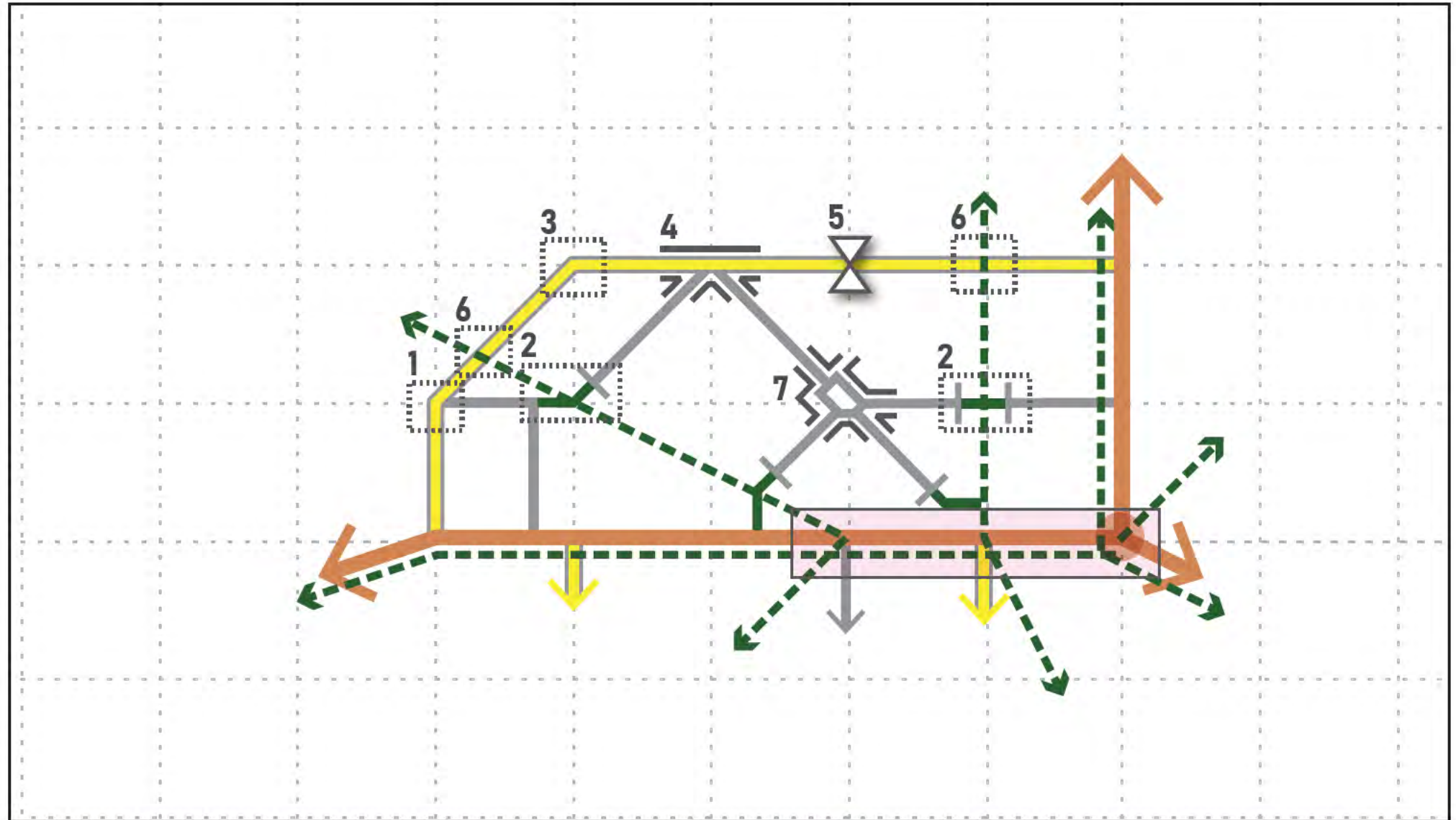
## MOVEMENT

### Street network - Tertiary street networks

For tertiary (types 4A and 4B) streets, a similar suite of strategies is recommended, with adaptations suited to the scale and context of these smaller streets.

**MO.35** The following techniques ensure the streets support their roles in accessibility and placemaking and **should** be utilised:

1. Change of direction/junctions: Utilise tight corner radii and limited visibility to slow vehicles and enhance pedestrian safety.
2. Modal filters: Disrupt vehicular continuity by allowing access only for pedestrians, cyclists, and other active modes, effectively creating low-traffic zones.
3. Tight corner radius: Use reduced corner radii to enforce slower speeds while maintaining connectivity and a pedestrian-friendly scale.
4. Urban form: Cluster junctions to encourage slower speeds and create visual interest, integrating street furniture and landscaping to enhance placemaking.
5. Pinch points: Introduce kerb buildouts or strategically placed parking bays to narrow lanes, creating informal traffic calming while supporting street character.
6. Cycle crossings/pinches: Highlight crossings with textured surfaces or colour changes, ensuring active travel modes are clearly prioritised.
7. Urban squares: Incorporate multifunctional public spaces within street layouts to naturally calm traffic while fostering community interaction.



#### Key

|  |                           |  |                              |
|--|---------------------------|--|------------------------------|
|  | Secondary street (cat 3b) |  | Active travel greenway route |
|  | Tertiary street (cat 4a)  |  | Modal filter                 |
|  | Tertiary street (cat 4b)  |  | Active travel connection     |



Sherford Plymouth - using urban form and public space to manage traffic speed



Sherford Plymouth - using pinch points with parking to manage traffic speed on straight streets



MOVEMENT

Street network

This section outlines the movement framework for the design code, building on the principles established in the preceding sections.

**MO.36** Developers **must** adhere to this principal movement framework as a mandatory guideline. While some flexibility in precise alignments is permitted, the fundamental principles and objectives of the framework must be strictly maintained.

The movement framework incorporates a series of modal routes to be implemented through adopted streets, bridleways, and footpaths. Where routes traverse multiple landholdings or include existing highway land, developers are responsible for coordinating the delivery of the required infrastructure.

**MO.37** The primary street network consists of primary, secondary, and tertiary 1 streets. Developers **must** follow the prescribed nature and locations of these streets, with a degree of design tolerance to accommodate site-specific needs. The finer tertiary 2 street network is not explicitly coded but should be designed in alignment with the street network principles outlined earlier.

- Key routes:
- Route 1: New primary street (Homestead Link Road)
  - Route 2: New primary street (Potsford Dam Link Road)
  - Route 3: New secondary street (Community Spine)
  - Route 4: Upgrade of Cawston Lane to secondary street
  - Route 5: New secondary street (Sustainable Transport Corridor)
  - 7: Modal filter to sustainable transport corridor

**MO.38** These streets **must** establish at least two connections to the main street network, forming the backbone for a future grid of tertiary 2 streets (not depicted in the framework).

Also refer to:

Public spaces

RBC local plan policy: DS9, D1 + South West Rugby Masterplan SPD (2021, updated 2024)

Warwickshire Design Guide

| Key                            |                               |
|--------------------------------|-------------------------------|
| Existing                       | Proposed or existing upgraded |
| <div></div> Primary (motorway) | <div></div> Primary           |
| <div></div> Primary            | <div></div> Secondary         |
| <div></div> Secondary          | <div></div> Tertiary          |
| <div></div> Tertiary           |                               |





MOVEMENT

Active travel framework

The active travel framework aims to create a dense, connected network to support internal active mode movements and facilitate wider connectivity to external destinations. This framework prioritises a segregated walking and cycling network for safety and accessibility.

Primary active travel routes:

1. Cawston Lane upgrade: Transition to secondary street with active travel accommodations.
2. Existing footpath upgrade: Conversion to active-only street.
3. Existing bridleway upgrade: Conversion to active-only street.
4. New Sustainable Transport Corridor: A secondary street designed for active travel and public transport.
5. Existing footpath upgrade: Conversion to active-only route/street.
6. Existing footpath upgrade: Conversion to active-only route/street.
7. New active-only route: Leading to the edge of the woodland.
8. New link (primary street): Potsford Dam Link Road.
9. New link (primary street): Homestead Link Road.
10. New link (secondary street): Community Spine.

This framework emphasises integration with key external connections, enabling efficient movement for pedestrians and cyclists.

Also refer to:

Public spaces

Built form

RBC local plan policy: HS1+ South West Rugby Masterplan SPD (2021, updated 2024)

Warwickshire Design Guide

Key

Existing PRow

Footpath

Bridleway

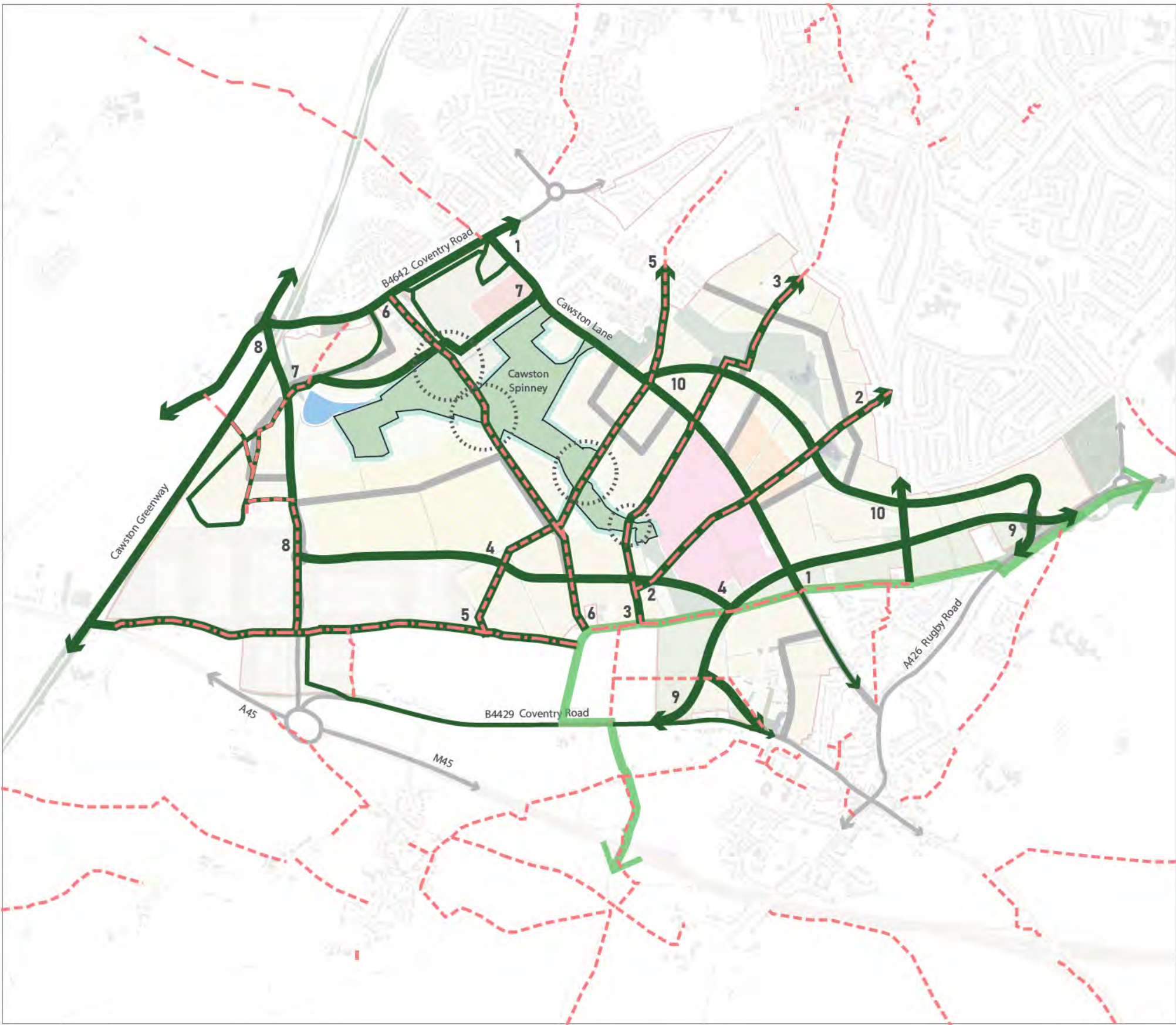
Restricted byway

National Cycle Route 41

Proposed strategic active travel network

Additional LCWIP proposals

Improved connection through Cawston Spinney/woodland





MOVEMENT

Bus + HGV network

The movement framework accommodates buses and HGVs for local access on primary and secondary streets. Tertiary streets are generally not designed to support HGV traffic, except for refuse collection vehicles and emergency services.

Also refer to:

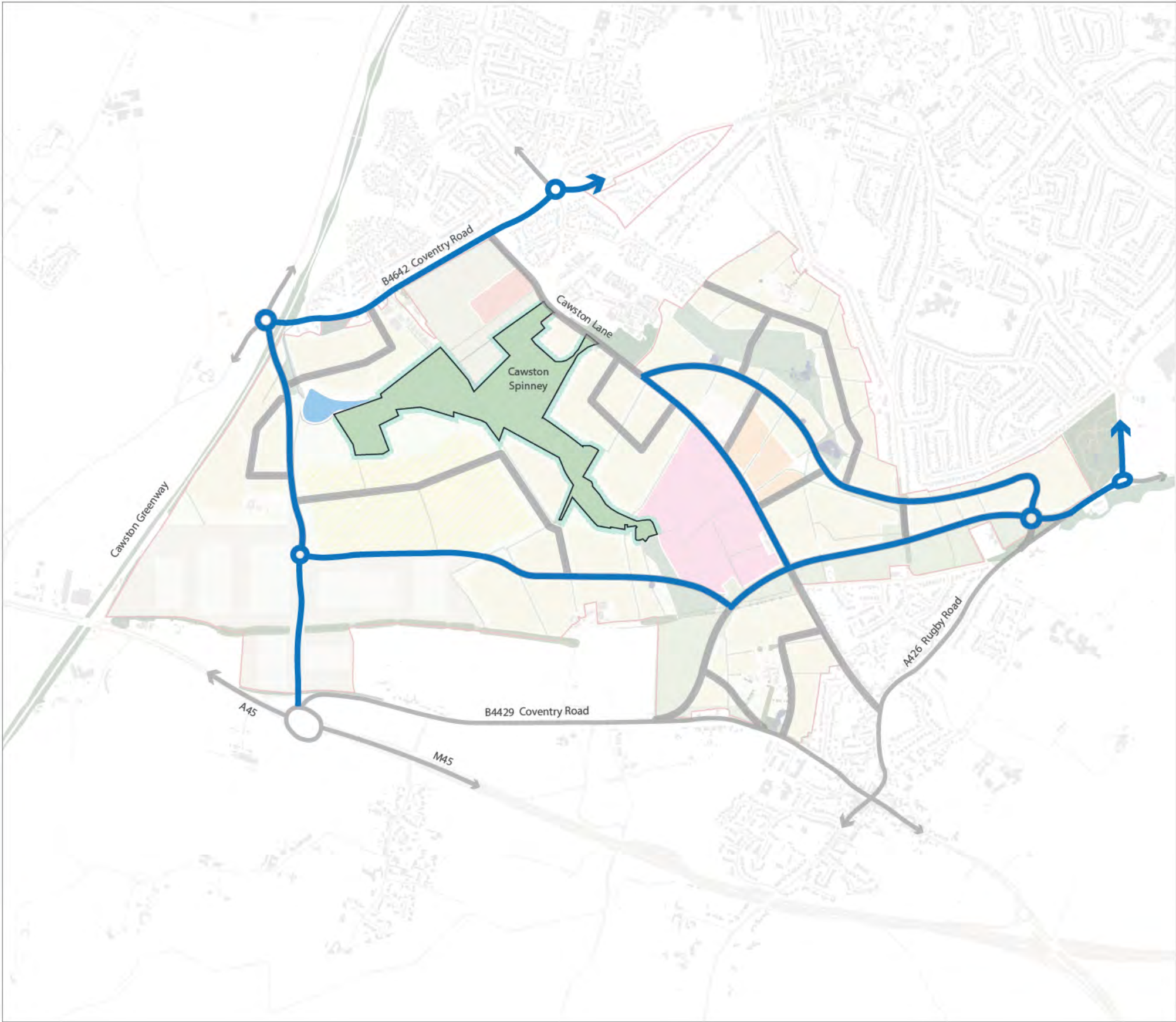
Public spaces

RBC local plan policy: DS9, D1 + South West Rugby Masterplan SPD (2021, updated 2024)

Warwickshire Design Guide

Key

Primary bus/HGV network





# MOVEMENT

## Related movement considerations

### Mobility hub

The delivery of sustainable transport infrastructure will be critical to the success and sustainability of the new community at SW Rugby.

**MO.33** Mobility hubs must provide a choice of sustainable transport modes and **should** make it easy to switch between those modes.

**MO.34** Users must be able to arrive by walking, wheeling, or cycling and **should** have seamless access to the available facilities or transport options.

**MO.35** A primary community mobility hub **must** be located in the local centre and should be supplemented by smaller 'mini mobility hubs' at key nodes, including employment locations and all bus stops.

**MO.36** Mobility hubs **must** be accessible, visible, and easy to navigate through good public realm design.

**MO.37** The design **must** contribute positively to the surrounding area with high-quality, distinctive architecture and a strong focus on community placemaking.

**MO.38** Mini mobility hubs **must** include:

- Bus waiting environments with real-time information where the hub is co-located with a bus stop.
- Cycle parking.
- Car club vehicle(s) in designated on-street bays.
- A meeting point with seating and enhanced public realm features.

**MO.39** The central mobility hub at the local centre **must** conform to the following principles:

- Bus integration, including a bus interchange.
- Neighbourhood car club.
- Cycle infrastructure for both short and long-distance journeys, including electric and cargo bike hire.
- Car park integration with EV charging facilities.
- Secure and covered cycle parking, accessible 24/7.

Also refer to:

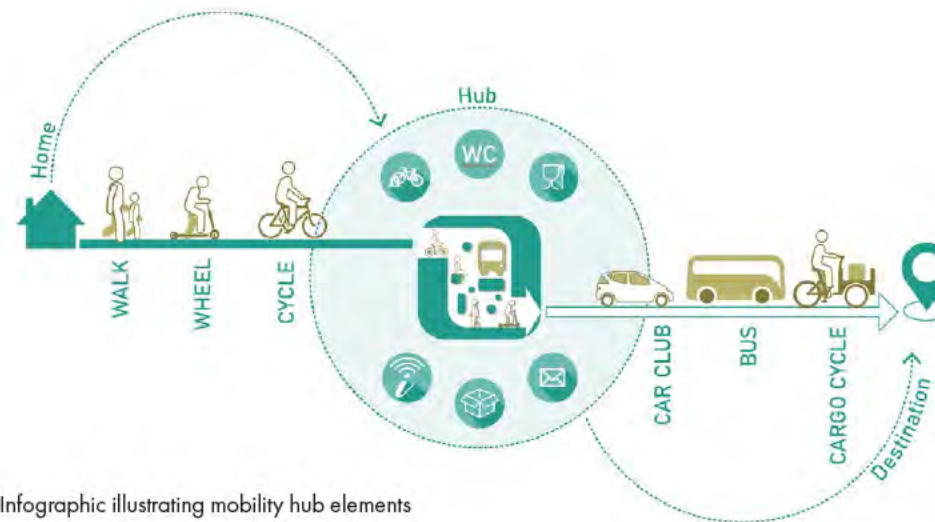
Public spaces  
Built form  
Homes + buildings

RBC local plan policy: DS8, DS9, HS1, D1, D2 + South West Rugby Masterplan SPD (2021, updated 2024)

Warwickshire Design Guide

**MO.40** Additional features **could** include:

- A café to encourage activity and provide natural surveillance.
- WC facilities.
- Cycle maintenance stations.
- A parcel delivery hub for drop-off and collection.
- Real-time mobility information through smart screens and QR code downloads.
- Design based on 'Secure by Design' principles while maintaining placemaking and inclusivity.



Infographic illustrating mobility hub elements



Mobility hub (CGI) in town square setting

### Cycle parking

**MO.41** Cycle parking **must** be provided close to homes and buildings, ensuring convenience and security.

**MO.42** It **must** be covered and accessible, encouraging use regardless of weather conditions.

**MO.43** Cycle parking **must** be more convenient than on-plot or off-plot car parking.

**MO.44** Secure cycle enclosures **should** be located at front entrances or side access points.

**MO.45** Enclosures **must** accommodate various cycle sizes and include power for electric bike charging.

**MO.46** Visitor and staff cycle parking **must** be provided at key nodes, using Sheffield-style cycle stands.



Eddington Cambridge - mobility hub bike store



# MOVEMENT

## Parking

**MO.47** Car parking **must** be designed to support placemaking, ensuring that it does not dominate the local environment.

**MO.48** Well considered parking **should** be convenient, safe, and attractive, integrating seamlessly into streets, blocks, and plots while providing access to EV charging points.

**MO.49** Parking standards are set out in the Rugby District Council Local Plan and **should** allow for both allocated and unallocated residential parking solutions. This flexibility could enable more people focused design approaches instead of prioritizing vehicle storage.

### Unallocated residential parking

**MO.50** This **could** provide an efficient way to accommodate vehicles, adjusting for the average rather than maximum car ownership.

**MO.51** In some development areas, all parking needs **could** be met in this way.

### Allocated residential parking

**MO.52** This **must** be accommodated on plot or in designated private parking courts or car barns.

### Non-residential parking

**MO.53** This **should** be integrated into the built form where possible, such as in semi basements or decks. Surface level parking must be positioned towards the rear of plots, away from the main street frontage, with landscaping used to reduce visual impact.



Nansledan, Newquay - employment hub landscaped car park

### Parking types

**MO.54** Developers **should** adopt parking solutions appropriate for the site and there **should** be a mix of approaches included to avoid dominance of one type, including:

### On Street Parking

**MO.55** This **must** be in designated bays interspersed with planting and street trees.

**MO.56** Perpendicular layouts **could** be considered where street width allows.

**MO.57** Bays **should** be at least 6m long and 2.5m wide on secondary streets, while tertiary streets should allow for 6m x 2.0m bays.

### Parking Courts

**MO.58** These **must** be overlooked for safety, **should** not exceed twelve spaces, and **should** incorporate green infrastructure.

**MO.59** Front parking courts **should** only be used on Tertiary T2 streets and must include street furniture and soft landscaping.



Sherford Plymouth - use of inset parking with trees



Nansledan Newquay - parking court with EV charging

### On-plot parking

**MO.60** At the side of the property **must** provide natural surveillance and be long enough to fit a car behind the building line.

**MO.61** At the front of the property **must** be set back at least 6m from the pavement, with screening through hedges or bin stores.

**MO.62** In the rear garden **could** be appropriate if well lit, overlooked, and does not impact quality of life.

**MO.63** Integral garages **should** be designed carefully to avoid dominating facades.



Kings Worthy - use of double garages as parking solutions in street scene



MOVEMENT

Related movement considerations

Emergency services

**MO.64** All developments **must** ensure full accessibility for emergency vehicles.

**MO.65** Developments with limited vehicle access points **must** account for alternative routes to ensure continued access if a road is blocked.

Key requirements include:

**MO.66** A minimum carriageway width of 3.7m between kerbs **must** be maintained for fire service vehicles.

**MO.67** Fire service vehicles **must** be able to get within 45m of all residential property doors.

**MO.68** Fire service vehicles **must** not be required to reverse more than 20m.

**MO.69** These requirements **must** align with guidance in the Warwickshire Design Guide, Part 3.

Refuse & recycling collection

**MO.70** Developers **must** incorporate effective refuse collection strategies, ensuring accessibility and integration with the public realm.

**MO.71** Detached/semi-detached housing: bins **must** be placed to the side or rear of properties.

**MO.72** Terraced housing: collection **must** be from bin stores to the front of the property.

**MO.73** Communal bin stores: these **must** be integrated into building footprints with rear access and designed to avoid blank facades.

**MO.74** Layout considerations: tertiary streets **must** be designed in service loops to allow efficient refuse collection.

**MO.75** Collection Points: all dwellings **must** be within 25m of an adopted road for refuse collection.

Highway adoption

**MO.76** All primary, secondary, and most tertiary streets (T1/2) **should** be adopted by Warwickshire County Council as the Highway Authority.

**MO.77** Industrial estate roads could remain private with appropriate public transport and public rights-of-way agreements.

**MO.78** The adoption process **must** comply with:

- Warwickshire Design Guide standards.
- Section 38 Agreements under the Highways Act 1980.
- Local authority procedural requirements for adoption.

The Warwickshire Design Guide provides further details on technical and procedural aspects of highway adoption.

Also refer to:

Public spaces

Built form

Homes + buildings

RBC local plan policy: DS8, DS9, HS1, D1, D2 + South West Rugby Masterplan SPD (2021, updated 2024)

Warwickshire Design Guide



Kings Worthy - well-designed bin store



Nansledan Newquay - adopted street







# PUBLIC SPACE

## Introduction

This section covers design principles for the street types previously identified.

A range of approaches are included, which identify the need for variety in street design for different uses and within different contexts. Applicants are expected to demonstrate how they have incorporated the information in this section and achieved appropriate design character.



PUBLIC SPACE

Secondary streets

Role  
Must provide high-capacity links to urban centres and the wider strategic road network.

Characteristics  
**PS.01** **Must** have limited or no frontage access to prioritize movement efficiency.

**PS.02** **Must** accommodate higher traffic volumes, including public transport and HGVs.

**PS.03** **Must** be continuous and connected at a minimum of two locations to the external highway network, ensuring multiple routing options for buses and general traffic.

**PS.04** All development **must** be within a 400m maximum proximity to secondary streets to enable easy access to buses.

Also refer to:

Movement

Nature

Built form

RBC local plan policy: DS8, DS9, HS1, D1 + South West Rugby Masterplan SPD (2021, updated 2024)

Warwickshire Design Guide



Kenilworth spine street (CGI)



Nansledan Main Street



Marmalade Lane Cambridge - Frontage to main street



Eddington Cambridge - Separated cycleway



French perpendicular parking



Tornigrain Inverness - Corner shop on main street



## PUBLIC SPACE

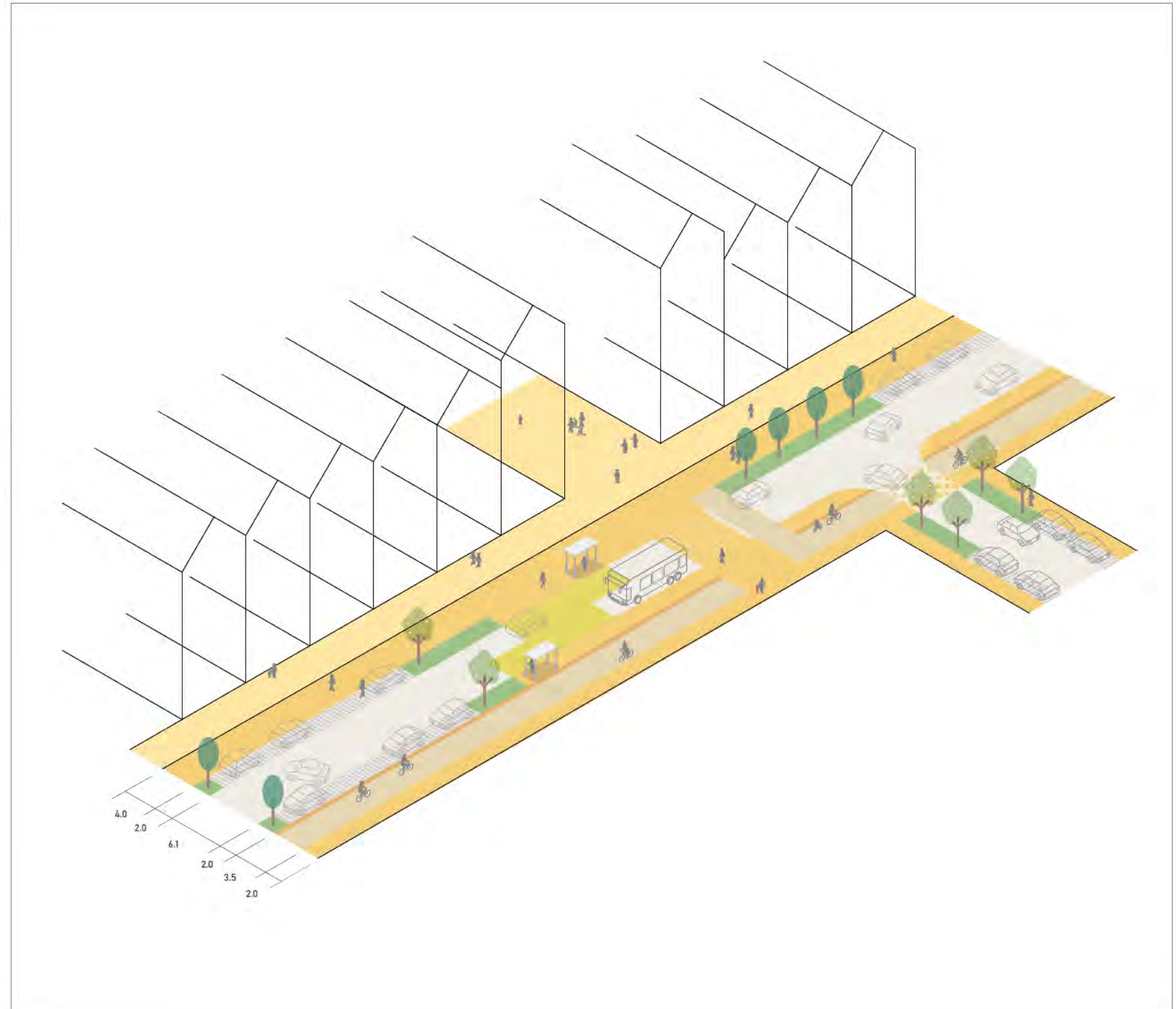
### Secondary streets

Urban residential/mixed use

This example illustrates design example A in the street network example (page 31).

**PS.05** Secondary streets in urban residential areas **must** meet the following design criteria:

- Carriageway width must be between 6.1m (minimum) and 6.7m (maximum) with inset parking bays or on-carriageway parking.
- Design speed must be 20mph maximum but should be 30mph if designated as a bus route.
- Highway verges could be provided, offering flexibility for street trees, inset parking bays, or footway construction supporting crossings and bus stops.
- Bus stopping facilities must be integrated, and pedestrian crossings must be prioritized for placemaking.
- Carriageway median and edge friction strips could be provided to aid speed management.
- Formal pedestrian crossings must be included at key desire lines, with informal crossings provided every 100m.
- Where required by traffic flow or speed, cycle protection must follow LTN 1/20 guidance.
- Standard 2.0m footways must be provided on both sides and could be wider in urban residential areas.
- Tertiary side street junctions must be designed as T-junctions, incorporating inline pedestrian and cycle priority crossings.
- Junction visibility must comply with MfS standards.
- No direct frontage access is permitted.





## PUBLIC SPACE

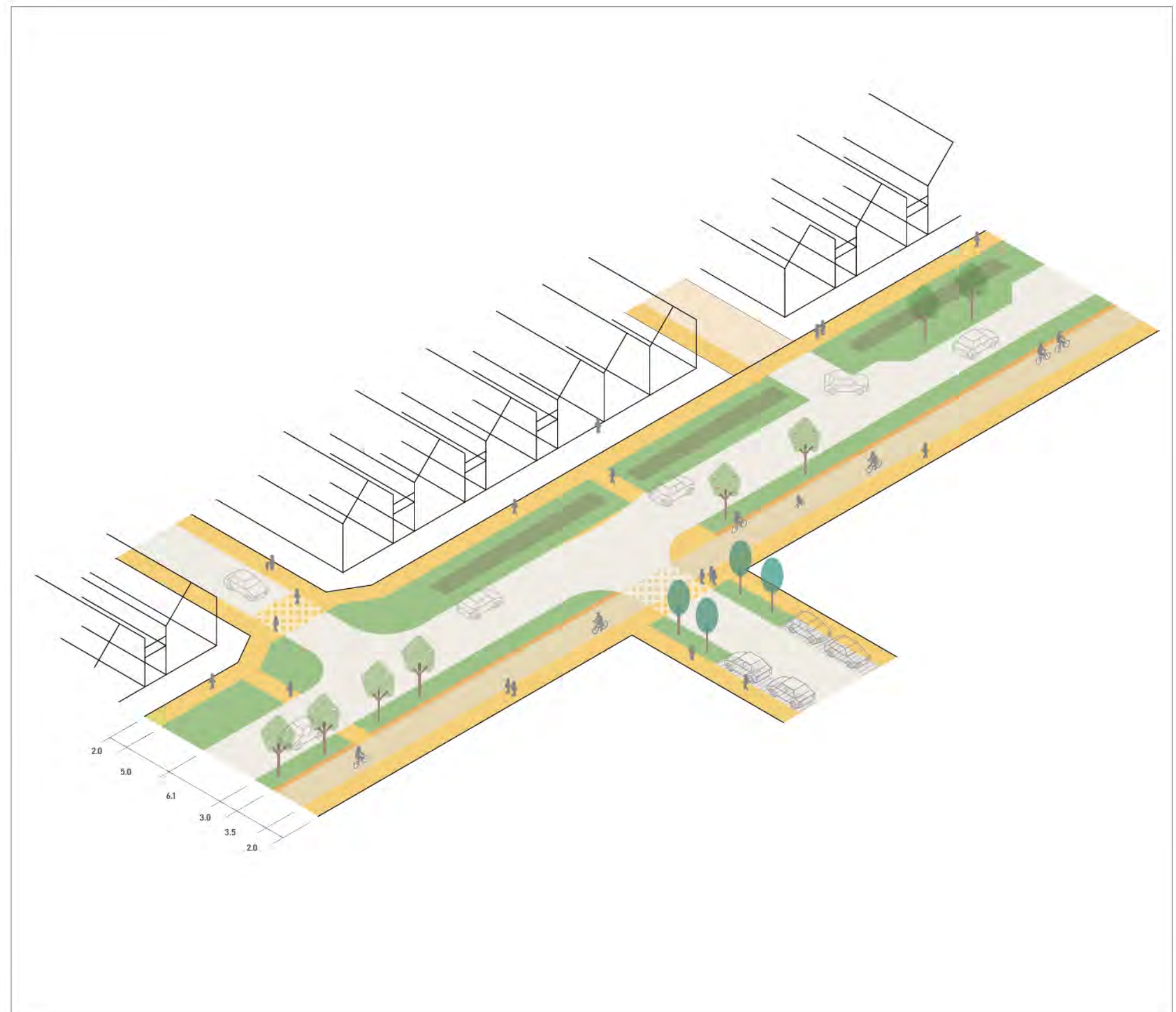
### Secondary streets

#### Suburban residential

This example illustrates design example D in the street network example (page 31).

**PS.06** Secondary streets in suburban residential areas **must** meet the following design criteria:

- Carriageway width must be between 6.1m (minimum) and 6.7m (maximum) with on-street parking.
- Design speed must be 20mph or should be 30mph if a bus route.
- Highway verges must be provided to support a mix of grass verges, street trees, SuDS features, inset parking bays, or footway construction.
- Bus stopping facilities must be provided along with nearby pedestrian crossings.
- Speed control measures must align with the principles in Section 2.5.
- Formal crossings should be provided at key pedestrian desire lines, with informal crossings required every 100m.
- Where required, cycle protection must follow LTN 1/20 guidelines.
- Standard 2.0m footways must be provided on both sides.
- Tertiary side street junctions must be designed as T-junctions with inline pedestrian and cycle priority crossings.
- Junction visibility must comply with MFS standards.
- No direct frontage access is permitted.





## PUBLIC SPACE

### Secondary streets - landscape general principles

#### Preservation

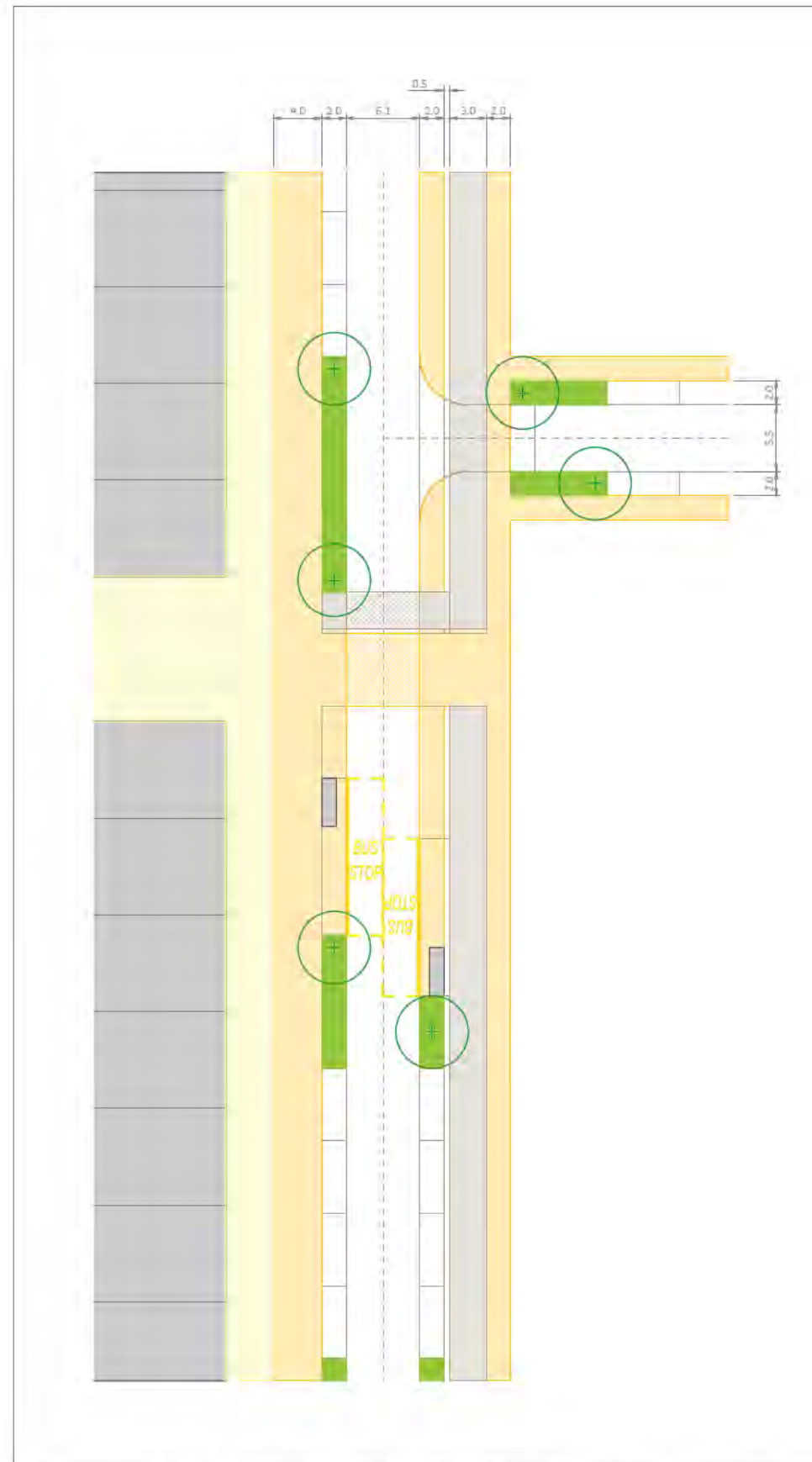
- PS.07** Where roads intersect with TPO groups BS5837:2012 'Trees in relation to design, demolition and construction – Recommendations' **must** be followed.
- PS.08** 2m buffer strip from centre of hedge **must** be provided to protect hedge and associated habitats. Hedges must be enhanced with diverse species mix and hedgerow trees appropriate to the local character.
- PS.09** 10m buffers **must** be applied to all water bodies.
- PS.10** Preservation of feature trees category A or B to BS5837:2012 **must** be applied.

#### Application

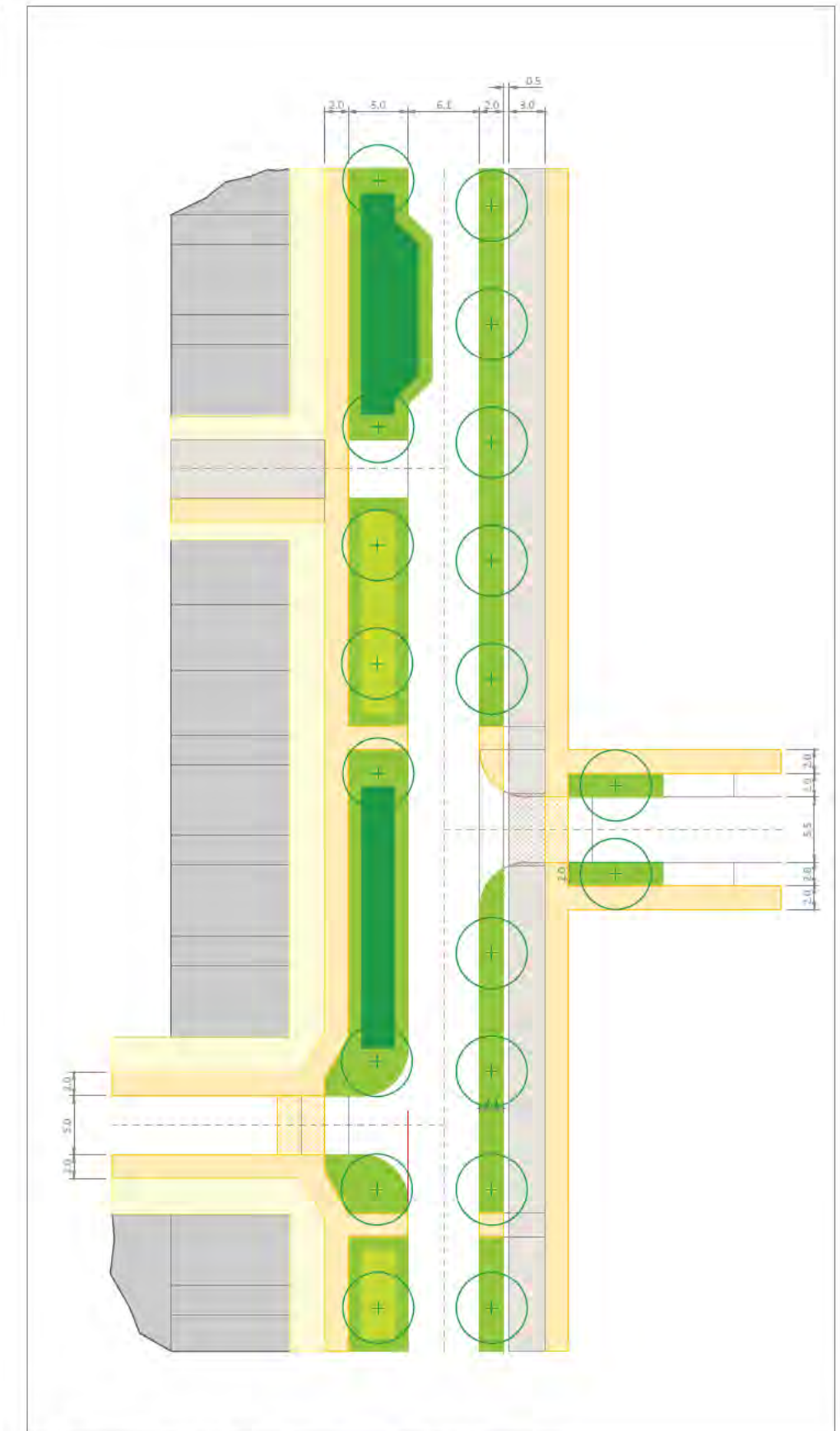
- PS.11** Standard best practice **must** be followed at all times; including but not limited to the use of tree anchors, double or single staking, irrigation tubes, protection guards including rabbit proof guards and temporary plant protection until establishment. This applies to all situations.
- PS.12** SUDs **must** be incorporated into the verges. Where more appropriate, ornamental non-native plant species should be specified.
- PS.13** Mown grass verges **must** be maintained up to 600mm comprising of grass species and flowering forbs with specimen tree planting.
- PS.14** Verges of 3m+ widths **must** be managed with diverse height structures.
- PS.15** Medium trees with 5.2m canopy heights on carriageways and 3.5m for any segregated/shared cycle route **must** be used. Such as; *Crataegus monogyna stricta*, *Tilia cordata* 'Streetwise', *Carpinus betulus* 'Frans Fontane'.
- PS.16** In visibility splays, mown grass **must** be maintained up to 600mm, single stem trees with slender girth at maturity must be specified.

#### Key

|  |                      |   |                     |
|--|----------------------|---|---------------------|
|  | Street trees         |  | Pedestrian space    |
|  | Amenity grass        |  | Pedestrian crossing |
|  | SUDs                 |  | Pedestrian space 2  |
|  | Grassland/wildflower |  | Cycle space         |
|  | Buildings            |  | Cycle crossing      |



Design example A: Secondary street in urban residential or mixed use context.



Design example D: Secondary street in suburban context.



PUBLIC SPACE

Tertiary streets

Tertiary Street T1

- PS.17 **Should** provide local access to residential properties and link to primary or secondary streets.
- PS.18 **Must** support direct frontage access and frequent junctions for permeability.
- PS.19 **Should** connect to other streets at both ends where feasible.
- PS.20 **Could** cater for up to 200 units unless multiple vehicle access points exist (e.g., a loop or connected network).

Tertiary Street T2

- PS.21 **Should** serve as cul-de-sacs or minor local access routes.
- PS.22 **Must** have limited connectivity, prioritizing localized movement and access.
- PS.23 **Must** carry a maximum of 50 units.

Also refer to:

Movement

Nature

Built form

RBC local plan policy: DS8, DS9, HS1, D1 + South West Rugby Masterplan SPD (2021, updated 2024)

Warwickshire Design Guide



Goldsmith Street, Norwich - use of inset parking, trees and informal crossings



Derwenthorpe, York - street trees in footway



Creation of pocket public space on a cul-de-sac



Nansledan, Newquay - use of nodal building and alignment change to slow traffic



Nansledan, Newquay - characterful urban form with t-junctions



## PUBLIC SPACE

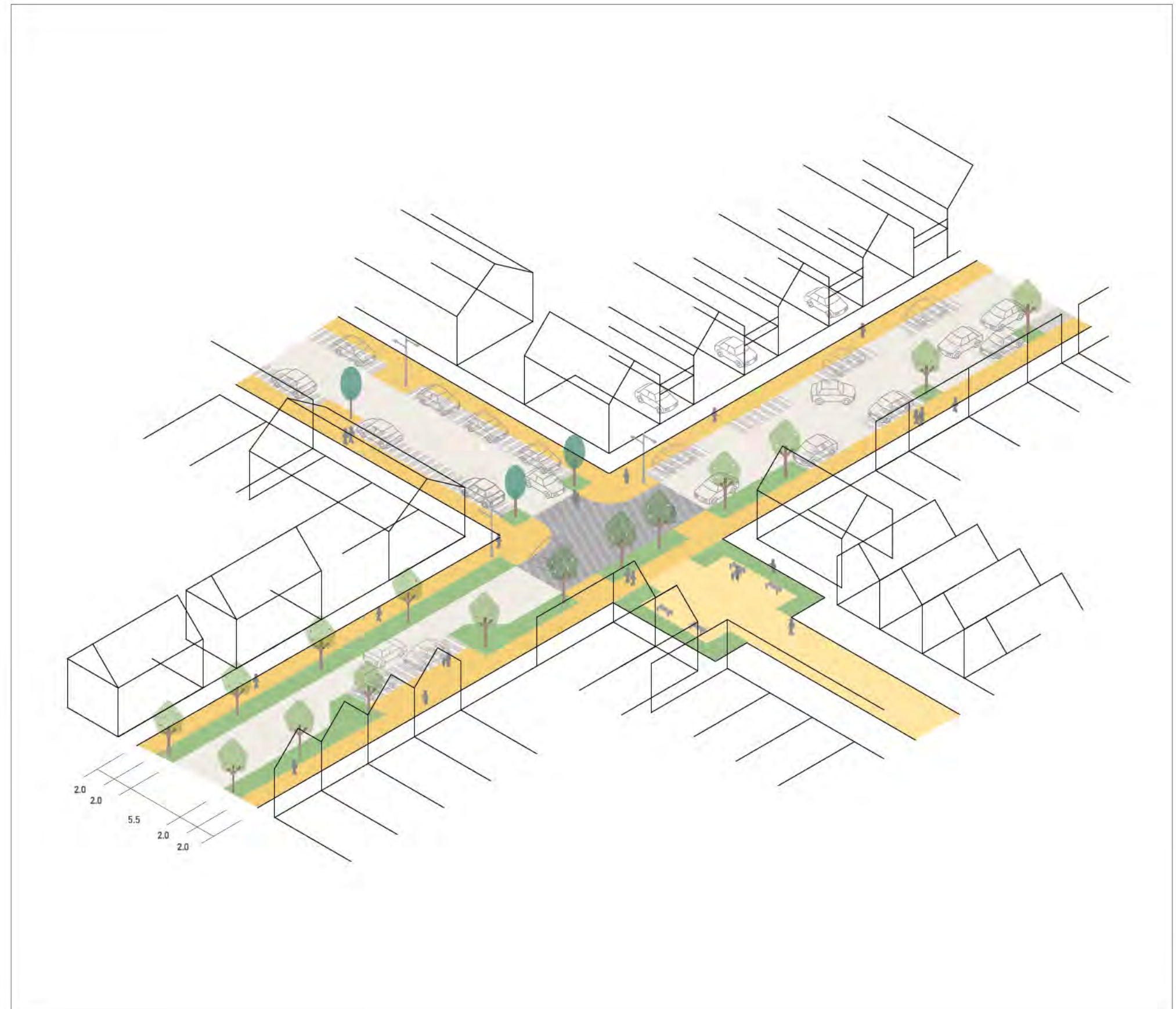
### Street codes

Suburban residential tertiary street T1

This example illustrates design example B in the street network example (page 31).

**PS.24** Tertiary streets T1 in suburban residential areas **must** meet the following criteria:

- Carriageway width must be 5.5m, excluding any additional parking.
- On-street parking could be provided as inset bays.
- Design speed must be 20mph maximum.
- Highway verges could include street trees.
- Informal pedestrian crossings must be placed every 100m.
- Safe cycling must be accommodated on-carriageway.
- Standard 2.0m footways must be provided on both sides.
- Frontage access could support on-plot parking.
- Side street junctions must be T-junctions with inline pedestrian priority crossings.
- Junction visibility must comply with MfS standards.
- Changes in carriageway material or colour at nodal points should be used for traffic calming.
- Speed reduction features could include curb buildouts protecting on-carriageway parking.





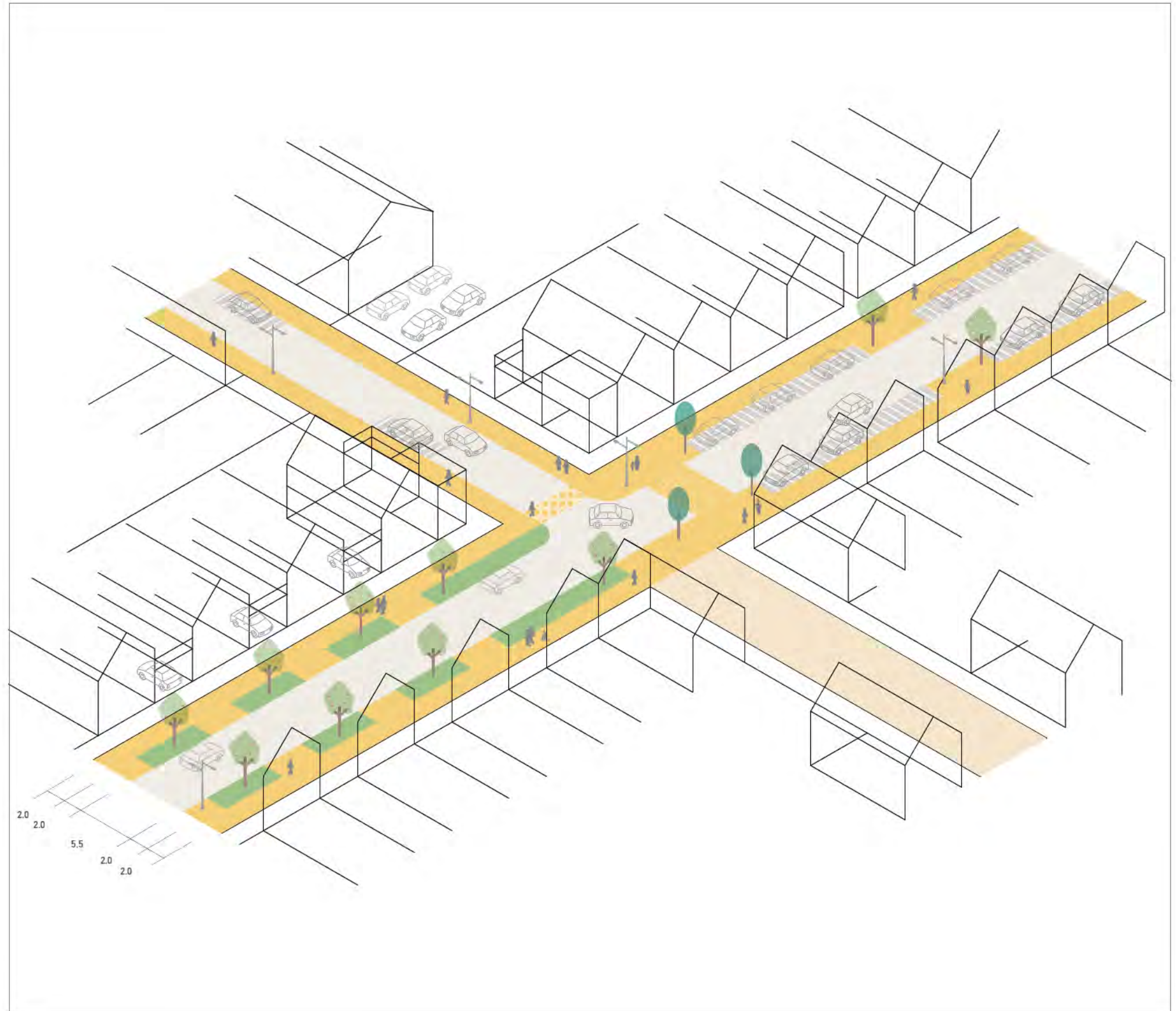
## PUBLIC SPACE

### Street codes

#### Suburban residential tertiary street T1

This example illustrates design example C in the street network example (page 31).

This example follows the same principles as T1 Design Example A but illustrates different parking arrangements, including on-street and on-plot parking variations.





## PUBLIC SPACE

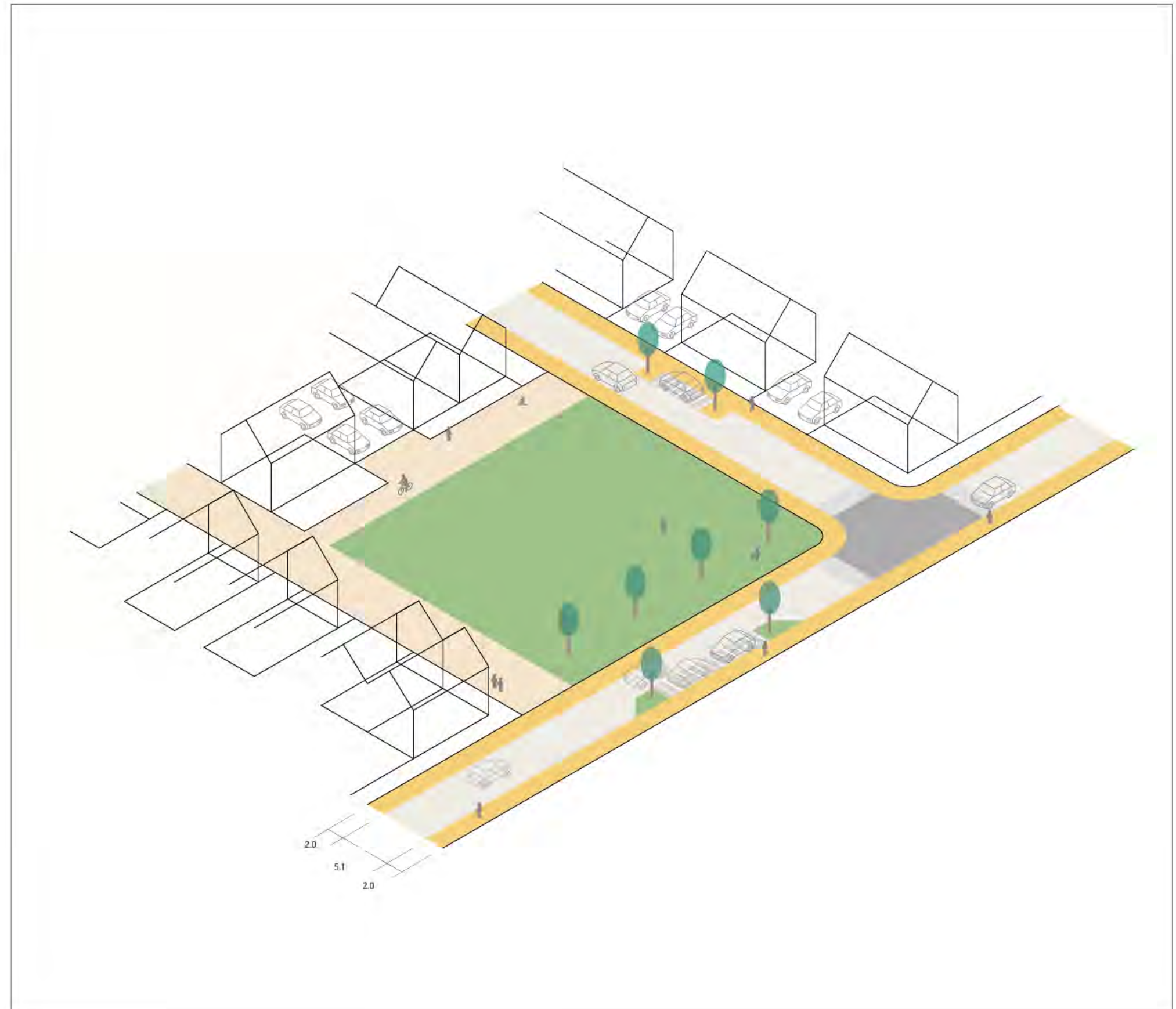
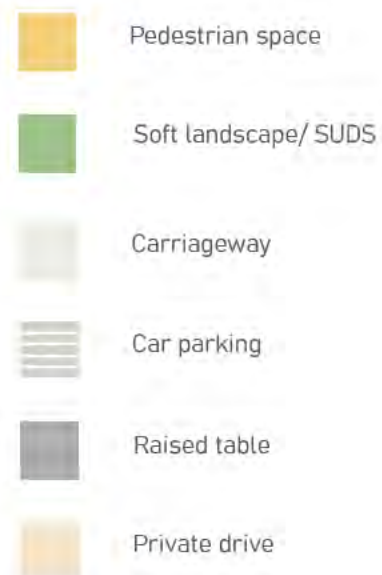
### Street codes

#### Suburban residential tertiary street T2

This example illustrates design example E in the street network example (page 31).

**PS.25** Tertiary streets T2 in suburban residential areas **must** meet the following criteria:

- Carriageway width must be a minimum of 5.0m, excluding any additional parking.
- On-street parking could be provided as inset bays or informal on-carriageway parking.
- Design speed must be 20mph maximum.
- Highway verges could include street trees but are not mandatory.
- Informal pedestrian crossings must be placed every 100m.
- Safe cycling must be accommodated on-carriageway.
- Standard 2.0m footways must be provided on both sides.
- Frontage access could support on-plot parking.
- Side street junctions must be T-junctions with inline pedestrian priority crossings.
- Junction visibility must comply with MfS standards.
- Carriageway material changes should be used for visual differentiation.
- Speed reduction measures may include kerb buildouts and other techniques outlined in the Movement section.





## PUBLIC SPACE

### Tertiary streets - landscape general principles

#### Preservation

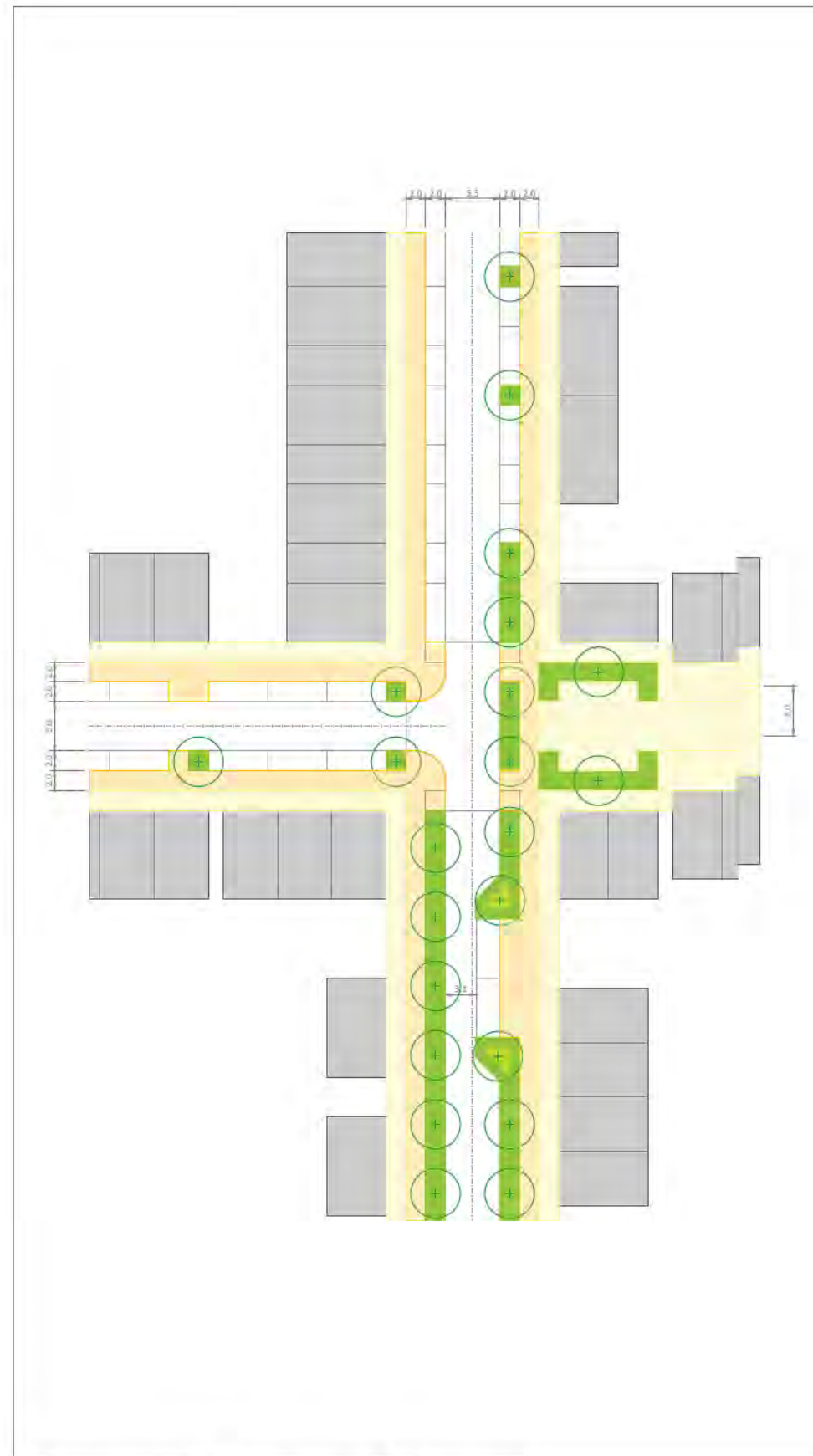
- PS.26** Where roads intersect with TPO groups BS5837:2012 'Trees in relation to design, demolition and construction – Recommendations' **must** be followed.
- PS.27** 2m buffer strip from centre of hedge **must** be provided to protect hedge and associated habitats.
- PS.28** Hedges **must** be enhanced with diverse species mix and hedgerow trees appropriate to the local character.
- PS.29** Preservation of feature trees category A or B to BS5837 BS5837:2012 **must** be applied.

#### Application

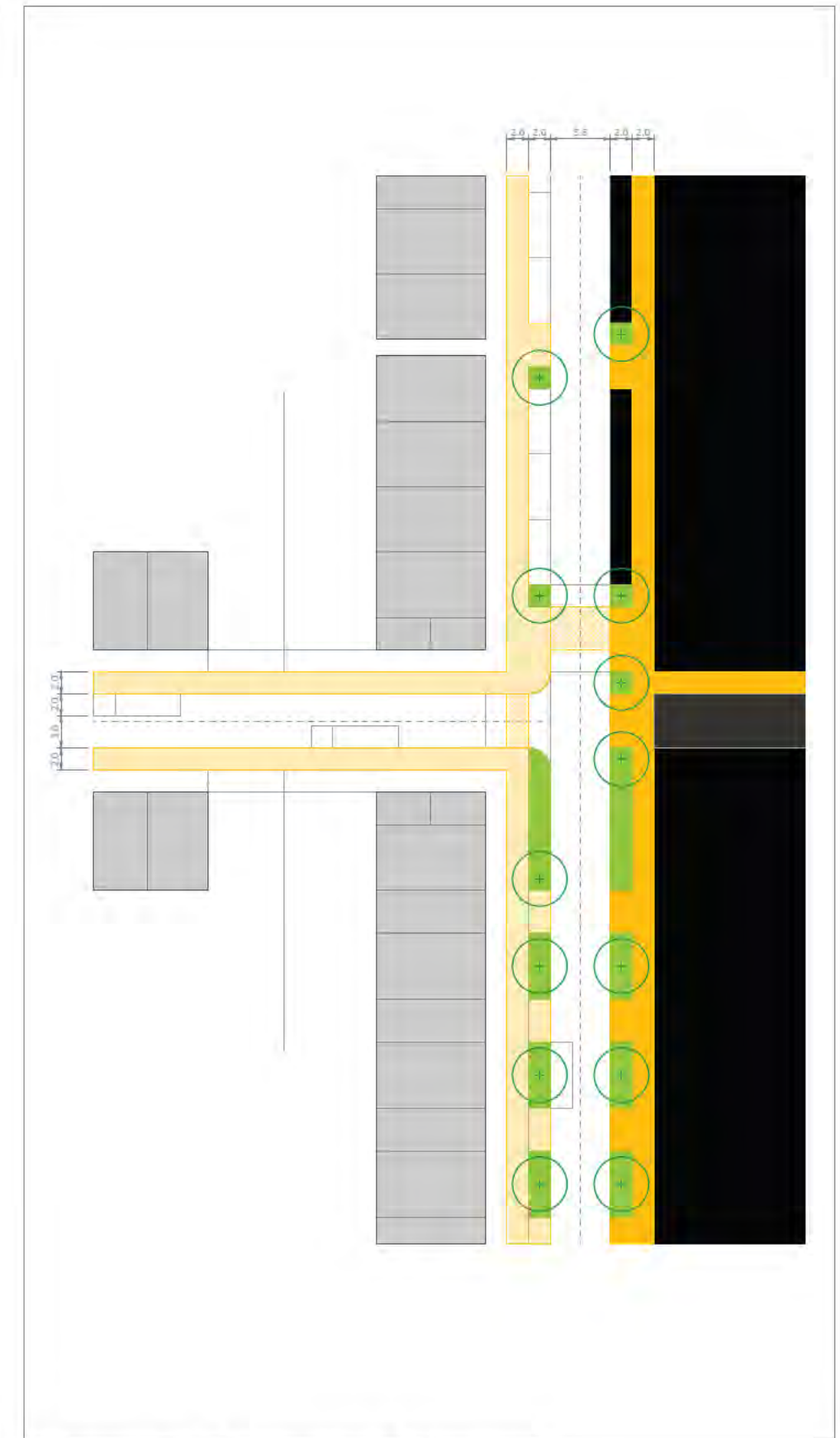
- PS.30** Standard best practice **must** be followed at all times; including but not limited to the use of tree anchors, double or single staking, irrigation tubes, protection guards including rabbit proof guards and temporary plant protection until establishment. This applies to all situations.
- PS.31** Mown grass verges **must** be maintained up to 600mm comprising of grass and flowering forbs species with specimen tree planting.
- PS.32** In visibility splays, mown grass **must** be maintained up to 600mm, single stem trees with slender girth at maturity must be specified.
- PS.33** Small to medium trees such as: Sorbus x arnoldiana Schouten, Prunus umineko, Sorbus aucuparia 'Cardinal Royal' **should** be specified.
- PS.34** Root barrier systems **must** be utilised where open spaces interface with highways.

#### Key

|  |                      |  |                     |
|--|----------------------|--|---------------------|
|  | Street trees         |  | Pedestrian space    |
|  | Amenity grass        |  | Pedestrian crossing |
|  | SUDs                 |  | Pedestrian space 2  |
|  | Grassland/wildflower |  | Cycle space         |
|  | Buildings            |  | Cycle crossing      |



Design example B: Tertiary street in suburban context.



Design example C: Tertiary street in suburban context.



PUBLIC SPACE

Street codes

- Private drives
- PS.35** Private drives **must** serve up to six units and remain unadopted.
- PS.36** They **should** be 5.5m wide and must not exceed 45m from the highway boundary.
- PS.37** They **should** be accessible by emergency vehicles and require a turning head if over 20m.
- PS.38** Refuse and emergency service access **must** be incorporated per WDG design guidance.



Nansledan, Newquay - Private drive with frontage

Also refer to:

Movement

Nature

Built form

RBC local plan policy: DS8, DS9, HS1, D1 + South West Rugby Masterplan SPD (2021, updated 2024)

Warwickshire Design Guide

- Car-free streets
- PS.39** **Must** create safe, sociable spaces and form part of the quiet/low-car active travel network.
- PS.40** **Should** be approximately 8m wide between buildings and could widen for play and social spaces.
- PS.41** **Must** be level-surfaced with connectivity for pedestrians and cyclists at both ends.
- PS.42** Resident cycle parking **must** be conveniently located and well-designed.
- PS.43** Emergency and refuse access must be maintained via proximate bin storage.



Marmalade Lane, Cambridge - Car-free street and community space



Marmalade Lane Cambridge - Community car park facilitating car-free streets

- Active-only routes
- PS.44** **Must** provide safe, dedicated spaces for cycling and walking.
- PS.45** **Should** include a two-way cycleway and one or two footways, adapting to context.
- PS.46** **Must** ensure safe and overlooked active travel, considering tree placement and height.



The Avenue, Saffron Waldron - Use of existing landscape to create functional, active-travel only route



PUBLIC SPACE

Minor streets - landscape general principles

Preservation

- PS.47** Hedgerows **must** not be removed.
- PS.48** Hedgerows **must** be enhanced with diverse species mix and hedgerow trees appropriate to the local character.
- PS.49** 2m buffer strip from centre of hedge **must** be provided to protect hedge and associated habitats. Hedges must be enhanced with diverse species mix and hedgerow trees appropriate to the local character.
- PS.50** Preservation of feature trees category A or B to BS5837 BS5837:2012 **must** be applied.

Application

- PS.51** Standard best practice must be followed at all times; including but not limited to the use of tree anchors, double or single staking, irrigation tubes, protection guards including rabbit proof guards and temporary plant protection until establishment. This applies to all situations.
- PS.52** Mown grass verges must be maintained up 600mm comprising of grass species and flowering forbs with specimen tree planting.
- PS.53** Small trees up to 6-8m high should be included e.g. Prunus pandora, Amelanchier arborea ‘Robin Hill’, Prunus x hillieri ‘Spire’
- PS.54** Permeable, landscaped boundary treatments to potential GI corridors (for example at the eastern boundary of the site to the rear of Alwyn Road) should be prioritised.
- PS.55** Minor roads terminating at the edges of open spaces must ‘borrow’ this landscape feature to emulate the open views of the landscape character.



## PUBLIC SPACE

### Street types for other uses

#### Potsford Dam Link

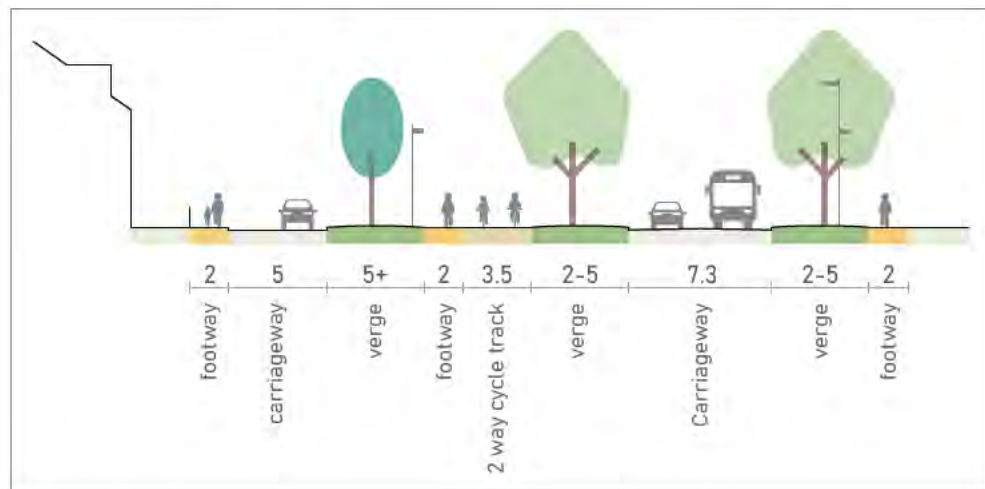
This strategic route **must** be classified as a category 3A primary road, designed to accommodate higher volumes of mixed traffic at faster speeds. Primary roads typically link strategic routes with urban centres and have limited frontage access.

**PS.57** The design of Category 3A roads **must** adhere to the Design Manual for Roads and Bridges (DMRB) and Warwickshire County Council (WCC) general design guidance as outlined in the Movement section.

**PS.58** Primary roads **should** have the character of a tree-lined avenue, incorporating generous landscaped verges with a rhythmic arrangement of street trees.

**PS.59** Footways and cycleways **must** be set back from the main carriageway to mitigate the impact of high traffic volumes, including heavy goods vehicles (HGVs).

**PS.60** Development frontage can provide a setting for the primary road, as illustrated in the section below. However, direct access must be avoided. Instead, a parallel tertiary or private drive **should** be provided for frontage access.



Also refer to:

Movement  
Nature  
Built form

RBC local plan policy: DS8, DS9, HS1, D1 + South West Rugby Masterplan SPD (2021, updated 2024)

Warwickshire Design Guide

#### Streets to employment development

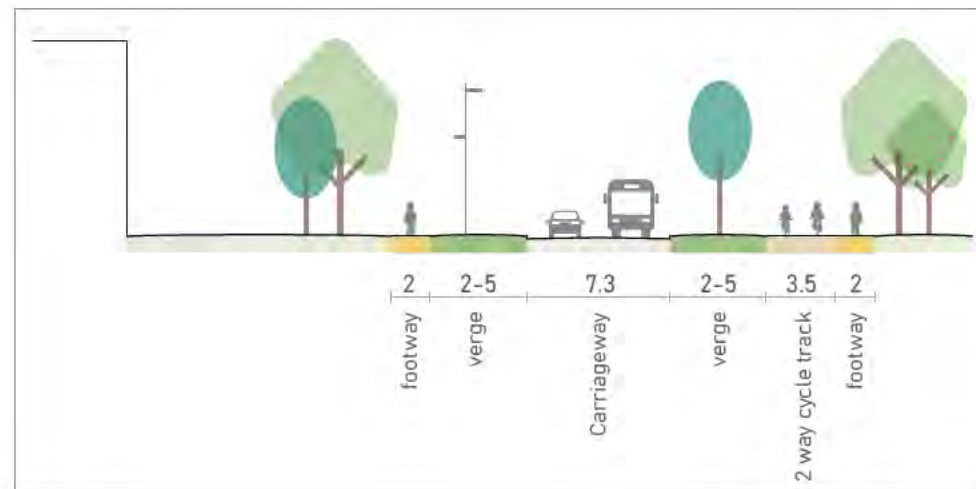
Industrial streets will generally be category 3B secondary streets, primarily serving industrial areas where HGV traffic is more prevalent.

**PS.61** These streets **must** provide efficient access and circulation within industrial zones, linking directly to other secondary streets or primary roads.

**PS.62** To maintain an avenue character, industrial streets **must** incorporate generous verges and street trees. Footways and cycleways should generally be set back from the carriageway to enhance safety and comfort for pedestrians and cyclists.

**PS.63** Development frontage **could** be:

- Set back within a landscaped area to create a buffer between industrial activities and the street, or
- Positioned at the back of the footway where appropriate for urban integration.



#### Schools streets

**PS.64** Streets near schools **must** prioritise vulnerable users, incorporating enhanced safety measures such as:

- Access restrictions
- Traffic management
- Parking controls
- Active travel infrastructure

**PS.65** Designers **must** ensure that school street designs integrate these safety features and that the character of these streets is clearly distinguished from other road types.

**PS.66** Where parental drop-off and collection are deemed necessary, provisions **must** include an off-street facility. This facility should:

- Feature a one-way loop system with separate entry and exit points for efficiency
- Minimise conflict between school children and vehicles

An example of a purpose-built facility can be seen at Tadpole Farm, Swindon (illustrated below).





PUBLIC SPACE

Hard landscape materials palette

| Route         |                      |   |   |
|---------------|----------------------|---|---|
| Secondary     | Designation          | Material  | Guidance  |
| Roads         | To adopted standards | Asphalt   | WCC Design Guide  |
| Footways      | To adopted standards | Asphalt   | WCC Design Guide  |
|               | To adopted standards | Block or Sett Paving<br>Colour consistency to be demonstrated   | WCC Design Guide<br>Note: Modular paving will, in many cases have a higher maintenance cost and so commuted sums may be required as part of the overall justification.  |
| Cycleways     | To adopted standards | Asphalt   | WCC Design Guide  |
| Junctions     | To adopted standards | Block or sett paving<br>Colour consistency to be demonstrated   | WCC Design Guide<br>Modular paving will, in many cases have a higher maintenance cost and so commuted sums may be required as part of the overall justification.  |
| Tertiary      |                      |   |   |
| Footways      | To adopted standards | Asphalt   | WCC Design Guide  |
|               | To adopted standards | Block or sett paving<br>Colour consistency to be demonstrated   | WCC Design Guide<br>Modular paving will, in many cases have a higher maintenance cost and so commuted sums may be required as part of the overall justification.  |
| Junctions     | To adopted standards | Block or sett paving<br>Colour consistency to be demonstrated   | WCC Design Guide<br>Modular paving will, in many cases have a higher maintenance cost and so commuted sums may be required as part of the overall justification.  |
| Minor         |                      |   |   |
| Footways      | To adopted standards | Asphalt (hot rolled asphalt with exposed aggregates- incorporating colour consistency with block and sett paving) | WCC Design Guide<br>Resin based surface treatments can be coloured and may be used both as a HFS and to introduce a colour.<br>HFS often uses calcined bauxite as its aggregate, which is not an environmentally friendly product, so should be avoided if at all possible. |
|               | To adopted standards | Block or sett paving<br>Colour consistency to be demonstrated   | WCC Design Guide<br>Modular paving will, in many cases have a higher maintenance cost and so commuted sums may be required as part of the overall justification.  |
| Junctions     | To adopted standards | Block or sett paving<br>Colour consistency to be demonstrated   | WCC Design Guide<br>Modular paving will, in many cases have a higher maintenance cost and so commuted sums may be required as part of the overall justification.  |
| Private roads | Non adoptable        | Block or sett paving<br>Colour consistency to be demonstrated   |   |



Speed Table Across Whole Junction



Block sett paving to junction: Tertiary



Coloured tarmac: Minor



Setts with Asphalt



High Friction Surfacing on Road



HFS with Modular



Conservation Kerb to Modular



PUBLIC SPACE

Hard landscape materials palette

| Other routes   |                          |  |  |
|--|--------------------------|--|--|
| Public Rights of Way<br>Interfaces with<br>movement routes | Throughout               | Permeable and non permeable solutions<br>Asphalt, hoggin, blinding, resin bound, self binding gravel options.  | Warwickshire Rights of Way officer must be consulted<br>See HFS notes for adopted routes.  |
| Public Rights of Way<br>Interfaces with<br>movement routes | To woodland no dig areas | Reinforced grass over tree cell system<br>Permeable surfacing over tree cell system or loose laid Breedon gravel or similar<br>Self binding gravel materials   | Warwickshire Rights of Way officer must be consulted`  |
| Bridleway<br>Interfaces with<br>movement routes            | Throughout               | Soft:<br>Grass, reinforced grass.<br>Hard: Asphalt, hoggin, blinding, bound rubber grit, self-binding gravel   | <a href="#">Ontherighttrack</a><br>On the right track: surface requirements for shared use routes (excluding mechanically propelled vehicles) Good Practice Guide<br><br><a href="#">Access and bridleways advice   The British Horse Society</a><br><br>See HFS notes for adopted routes. |
| Non designated recreational routes                         |                          | Reinforced grass over tree cell system<br>Permeable surfacing over tree cell system or loose laid Breedon gravel.<br>Self-binding gravel, hoggin.<br><br>Rumble strips:<br>Block or sett paving<br>Colour consistency to be demonstrated |  |
| Greenway links<br>interfaces with<br>movement routes       | Throughout               | To Sustrans guidance<br>Typically:<br>Hard: Asphalt, hoggin, blinding, bound rubber grit, self-binding gravel<br><br>Rumble strips:<br>Block or sett paving<br>Colour consistency to be demonstrated                                     | <a href="#">Sustrans traffic-free routes and greenways design guide - Sustrans.org.uk</a><br><br>See HFS notes for adopted routes.   |



Greenway Entrance to POS



Woodland Walk



Woodland Path



Greenway Alongside Road



Cell Web over veteran trees  
Calke Abbey



Cell Web and Resin Bound Gravel



Greenway Route



Reinforced Grass