

# Newton and Biggin Parish Council

## Formal Response to Rugby Borough Council's Local Plan Consultation

### 1. INTRODUCTION.

Newton and Biggin Parish Council thanks you for the opportunity to comment on the initial 'Issues & Options' paper. Clearly many consultees will want answers (How many? Where?) but it is recognised that will come later in the process and that the current stage is aimed at shaping the Local Plan.

Having said that there is clearly much greater certainty in some of the chapters of the document (Climate Change and Design Code for example) than there is with others (Employment and Housing). The Parish Council does not, at this stage, want to respond to each of the questions that you pose in the document because it simply does not have the technical knowledge of what lies behind them to provide meaningful answers. It is suggested that, for the reasons touched on above, that there aren't actually any definitive answers at this stage and that to suggest there are, is likely to skew the future progress of the Local Plan.

An issue that crops up several times is that RBC has not yet determined what the plan period is. 2041 or 2050 makes a significant difference to allocation figures and clarity is required to allow for meaningful consultation response.

The Parish Council therefore confines its response for now to some narrative points as follows.

### 2. EMPLOYMENT

2.1. The attempt to meet (alleged) demand for grow on space is laudable but is difficult to achieve in the real world. Developers are unwilling to take on the additional workload of managing multiple small units, tenancy structures don't lend themselves to smaller occupiers and there is a strong demand for large units. RBC has recently recognised this in granting planning permission for one large unit at Coton Park in lieu of the small units allocated in the Adopted Local Plan. It maybe that the only way RBC can secure grown-on units is via planning gain on a marginal site or by investing its own capital in the development.

2.2. Para 3.21 contains a reference to "additional site allocations" for manufacturing and R&D. When will this be quantified and using what criteria?

2.3 Reference is made to the Coventry and Warwickshire additional requirement for employment land as being 'significant' but it is not quantified. Clarity is required to allow for a response.

2.4. The Parish Council agrees with the identified broad locations; indeed it is difficult to envisage where employment allocations can be made other than on major trunk and A roads. Clearly some will have greater local impact than others and assessment of this will, undoubtedly, form part of the selection process.

#### **4. TOWN CENTRE**

The problems and issues affecting the town centre are not peculiar to Rugby as they are common nationally across all similar towns. Part of the problem arises from traditional centres being too big for the market they currently serve (given online sales, and changes to retailing from both a customer and traders perspective). Town centres have always evolved and need the flexibility to do so in future. For that reason, the Parish Council fully supports the proposal to do away with policies aimed at preserving primary and secondary retail frontages.

#### **5. GYPSIES AND TRAVELLERS.**

5.1. No distinction is made between transit and residential sites. Is this an oversight or deliberate?

5.2. It is no surprise that G&T sites were not put forward as part of the call for sites. If this has not yet been done, might it be profitable to contact the Gypsy Council or other representative bodies to see if the community itself might promote sites?

5.3 Attempting allocations as adjuncts to residential or employment sites is likely to be resisted by developers but may, conceivably, work as planning gain on marginal sites. Worth a try!

#### **6. HIMO**

The Parish Council does not wish to comment.

#### **7. CLIMATE CHANGE.**

7.1. Requiring developments to be net zero will add significantly to costs as Para 7.37 recognises. It is essential that this has developer support if it is not to act as a barrier to development in the Borough. It would be helpful if neighbouring Councils had similar policies.

7.2. The Parish Council supports the identification of wind and solar energy areas but is not in a position to identify these as technical and landscape issues will need to be assessed.

7.3. The Parish Council supports the idea of minimum tree canopy coverage but reminds RBC that support of WCC is essential as the Highways Authority is traditionally hostile to significant numbers of highway trees.

#### **8. DESIGN CODE**

The Parish Council would support coding Borough-wide based on character areas.


#### **9. HOUSING.**

9.1 This is usually the issue that causes the most reaction in a Local Plan consultation and it is assumed that will be the case this time. At this stage there is considerable uncertainty in relation to the numbers. Again, this is partly caused by RBC not having yet determined the plan

period (2041 or 2050) and is compounded by uncertainty as to whether to use figures based on Minimum Growth or HEDMA. This results in planned growth ranging from 0 to 8,101. This uncertainty needs resolving if meaningful consultation is to be facilitated.

9.2. The suggested locations (a combination of urban edge and larger villages) are appropriate for a first search in that they have the best prospects of providing sustainable locations. The larger villages, with schools, shops, public transport and other facilities might provide more sustainable locations than urban edges which can be remote from facilities. However, if all of the housing isn't to be grafted onto the urban area then RBC will need to grasp the nettle of Green Belt development and justify it in terms of the hierarchical search for sites.

Again, the Parish Council welcomes this opportunity to comment and looks forward to being actively involved as the Local Plan process continues.

 , on behalf of Newton and Biggin Parish Council

25<sup>th</sup> January, 2024