

Rugby Local plan review - issues and options consultation – North Warwickshire responses

Encouraging to note the information and explanation provided around the pressure from and growth of strategic logistics/warehousing proposals/uses.

The Borough Council support the comments made regarding WMSESS and need to address the strategic employment need on a subregional basis, including identifying potential strategic employment locations and highlighting the including contribution to meeting future need that will be made by the redevelopment of existing employment sites.

However, we note that the WMSESS will not be specifically identifying opportunity sites for potential future supply, rather identify opportunity areas/locations and criteria that can be used in assessing the appropriateness and suitability of site proposals.

Question Title and North Warwickshire responses as follows:

Q1. How much employment land should we be planning for?

A: Rugby should be addressing its identified Employment Land needs/requirements and an element of the sub-regional need identified in the HEDNA.

Q2. What type of employment land should we be planning for?

A: Again the HEDNA will advise, recognising the pressure to address strategic B8/Employment demands and there is considered to be a need for smaller to medium size sites to enable and accommodate start-up businesses and affordable opportunities for emerging and growing businesses.

Q3. Please provide any comments you have on the suitability of any of the broad locations listed above (or another location we have missed).

A: Locations are noted and North Warwickshire is supportive of the approach taken, subject to including Policy requirements for of development proposals to address highway improvements, including to strategic highway network, addressing wider than local pressures and growth (outside of and within the Borough), and delivering on-site lorry parking and driver servicing facilities (where appropriate). Proposals/Sites should also address their impact on wider than simply on-site or Borough impacts through discussions and negotiations with Strategic Highway Authorities (Highways England/National and County Highway Authorities).

Q4: How can we provide more space to allow existing businesses to expand?

The feedback we have received from local businesses is that there is a shortage of 'grow on space' in the borough to allow existing businesses to expand and incubator space for new start-ups.

A: Agreed and supported. Include an element of 'incubator' start up units as part of proposed site allocations, or as stand-alone sites with restrictive use/conditions?

Q5: We are minded to allocate sites specifically for industrial (B2) and light industrial (E(g)(iii)) uses. Do you support this and if so, where?

Yes

No

A: Subject to any sub-regional impacts to be addressed this approach would support supply and diversification of employment types and offer within the Borough, nevertheless ,this issue is for the emerging Local plan and Borough to determine.

Q5 cont'd: If yes, where?

A: Subject to sub-regional impacts to be addressed, this issue is for the emerging Local plan and Borough to determine.

Q6: Are there exceptional circumstances that mean we should amend Green Belt boundaries to meet the need for employment land?

Most of the broad locations shown on the map above lie within the Green Belt. We will consider whether there are exceptional circumstances which justify alterations to the Green Belt.

Yes

No

If yes, where?

A: Considered unable to provide an informed comment as this will be dependent on the merits of each case (exceptional circumstances) and the level of need evidenced at the time of any application or Local Plan site proposal. Future changes to Local Plan guidance and planning acts or regulations, and site delivery within sub-regional or regional sites elsewhere may also change the situation. If sub-regional and/or National need can be evidenced, then sites may currently be able to be released (subject to addressing highway and other development

Q7. Do you agree with our proposals to remove the primary shopping area and primary and secondary frontage designations in Rugby town centre? If yes, where?

Yes

No

A: North Warwickshire Borough have already faced this issue as a result of changes being introduced during the Examination of the new local plan. This resulted in the removal/dropping of primary and/or secondary shopping frontages. secondary shopping frontages. Nevertheless, the new

Q8: Which town centre sites should have site allocation policies and what should they say?

A: No comment , a Rugby Borough specific issue for the emerging local plan.

Q9: Should we introduce a policy that sets out the improvements to streets and spaces we want to see in the town centre?

Yes

No

If yes, where?

A: Supported. This may be useful, in the potential to help direct S106 financial contributions from development proposals/applications towards delivering specific Town Centre improvements where these are well related to, or supportive in enhancing the Site proposals? Linked to Climate Change and Well-Being policies within the Local Plan?

Q10: Should we define local centres? If yes, which centres should we include?

Yes

No

If yes, where?

A: North Warwickshire will not comment on which specific local centres as this is a matter for Rugby Borough but agree with the Boroughs consideration of this approach. There is some potential, through new Local plan policies, to help maintain/protect defined local centres, or direct appropriate enhancements, services and infrastructure towards centres (notwithstanding the expansion 'pd' rights and relaxation of use classes currently introduced).

Q11: Are there other things the local plan should do to support local town centre regeneration?

Yes

No

If yes, where?

A: Direct other services and facilities toward identified centres and identify enhancement proposals or policies, that will benefit Centres and their local communities well-being, where appropriate or linked to major proposals to enable S106 cross funding from commercial or housing allocations/proposals that will benefit.

Q12. The council proposes to plan for Gypsy and Traveller pitches based on the ethnic need target of 79 pitches 2022-2037 identified in the GTAA 2022. Do you agree?

Yes

No

If yes, where?

A: North Warwickshire have no comments on which specific sites as this is a matter for Rugby Borough. However, the Borough Council consider the 79 pitch figure should be a minimum, pitch requirement not a "target". The Rugby Borough Council Gypsy and Traveller Accommodation Assessment Study specifies a "Requirement for residential pitches 2022-2027" and for "2027-2037", not targets, notwithstanding that the 79 pitch figure relates to the 2022 to 2037 needs for those who meet the Ethnic definition.

Q13: How can we find sites to accommodate the need for Gypsy and Traveller pitches?

Allocate sites for Gypsy and Traveller pitches as part of new employment land or housing developments

Regularise existing unauthorised sites

Create a new borough or county council-owned site

Other (please explain)

A: All approaches and proposals should be considered, to help both address need and reflect difficulties and sensitivities involved in identifying sites and enabling them/bringing them forward as potential allocations.

Q14: When allocating sites for pitches, what size of site should we be seeking to allocate?

A: North Warwickshire Borough have indicated within their adopted Local plan, a preference for smaller, family-based sites to address need and for larger sites to be limited (10 or less). This helps avoid site management difficulties and social issues arising, including conflict between communities within the traveller groups or with settled communities.

Q15: Should we adopt a negotiated stopping policy which allows caravans to be sited at a suitable location for an agreed and limited period.

Yes

No

If yes, where?

A: North Warwickshire will not comment on which specific sites as this is a matter for Rugby Borough. But it would be beneficial to the community and help avoid planning enforcement/trespass potential by having transit/emergency sites identified and available to direct the passing traveller communities towards.

Q16: The council proposes to introduce a policy to limit concentrations of HMOs within a 100m radius to 10% of dwellings, avoid non-HMO dwellings being sandwiched between two HMOs and avoid three consecutive HMOs on a street. Do you agree with this policy?

Yes

No

If yes, where?

A: North Warwickshire have no comments on this issue as this is a matter for Rugby Borough Council members and officers.

Q17. We also propose to introduce a criteria-based policy that sets clearer standards for parking, refuse storage, and the adequacy of external and internal space for HMOs. Do you support such a policy?

Yes

No

If yes, where?

A: North Warwickshire have no specific comments on this issue as this is a matter for Rugby Borough Council members and officers, but fully support the approach being taken, particularly around parking and refuse.

Q18: Should we show areas of the borough in which wind and/or solar energy will be supported? If so, where?

Yes

No

If yes, where?

A: North Warwickshire have no comments on this issue as this is a matter for Rugby Borough Council members and officers.

Q19: If some new wind development schemes could be community owned by RBC residents, would that increase your support for this type of development?

Yes

No

If yes, where?

A: North Warwickshire have no specific comments on this issue as this is a matter for Rugby Borough Council members and officers, but are supportive of communities receiving direct benefit from or direct involvement in sustainable renewable energy proposals.

Q20: We are minded to introduce a policy that supports other zero carbon energy infrastructure including battery energy storage and hydrogen energy infrastructure. Do you agree?

Yes

No

If yes, where?

A: The North Warwickshire Forward planning team support the approach proposed, subject to appropriate Development Management Controls, policies and caveats being applied, particularly to avoid adverse impacts where sites are high agricultural land value (Gd's 1 and 2), or Land with environmental, landscape classifications or other important local and statutory

designations are affected/impacted, including addressing cross border situations. with adjoining local Authorities designations.

Q21: Should we adopt a minimum tree canopy policy for new development?

- Yes
- No

If yes, where?

A: North Warwickshire have no specific comments on this issue as this is a matter for Rugby Borough Council members and officers

Q22: Should we identify priority locations or allocate sites for biodiversity net gain for sites which are unable to provide all the net gain on site, if so, where?

- Yes
- No

If yes, where?

A: North Warwickshire have no comments or sites to suggest on this issue, as this is a matter for Rugby Borough Council members and officers, but note the benefit of identifying sites where biodiversity net gain can be achieved and delivered/provided locally.

Q23: Would you support the creation of an additional country park as part of delivering biodiversity net gain?

- Yes
- No

If yes, where?

A: North Warwickshire have no comments or sites to suggest on this issue, as this is a matter for Rugby Borough Council members and officers, but note the benefit of identifying a site or vehicle that will help delivery of biodiversity net gain within the Borough and benefitting Rugby residents.

Q24: Should we require developers to prioritise the delivery of biodiversity gain within close proximity to the development?

- Yes
- No

A: Yes

Q25: We are considering requiring all residential developments to be net zero. Do you agree?

- Yes
- No

A: See Answer to Q27. A matter for Rugby Borough Members and Officers. Use of National applied building Regulations introduced by statutory Government Regulations rather than Local Planning policies that are challengeable is seen as a more reliable and appropriate statutory approach to achieving this aim.

Q26: We are considering requiring all non-residential development to be net zero. Do you agree?

- Yes

No

A: See Answer to Q27. A matter for Rugby Borough Members and Officers. Use of National applied building Regulations introduced by statutory Government Regulations rather than Local Planning policies that are challengeable is seen as a more reliable and appropriate statutory approach to achieving this aim.

Q27: Are there other climate change policies we should be introducing?

A: Where impending changes to Building Regulations address the specific climate change issue (i.e. before the Adoption of a Local plan is programmed) it will not be necessary for a draft Local Plan to include policies that will, in effect, be overtaken by events and statutory regulatory requirements.

Nevertheless, where there is evidence to support increased standards to address Net Zero and Climate Change adaptations for new developments, and the time potential for national Legislation being introduced, finalised or developed is significant, then the opportunity is open for Local authorities to introduce local policies seeking or requiring higher than national development standards.

Q29: Should we produce design codes as part of our new local plan?

Yes

No

Q30: Which areas should design codes cover?

Borough-wide

Borough-wide divided into character areas (for example Rugby town centre, interwar suburb, Victorian terrace, village core)

only for some neighbourhoods (please specify which) below

only for large new development sites

Other (please specify)

A: North Warwickshire have no detailed comments on this issue as this is a matter for Rugby Borough Council members and officers. We would note simply that the National Planning Policy Framework (NPPF) highlights that local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide & Code. The 'LURA' Planning Act also effectively creates a 'requirement' on local planning authorities to create design codes.

Q31: How many new homes should we be planning for?

Minimum local housing need

The HEDNA 2022 need

Other (please specify)

A: The HEDNA 2022 need.

Q32. The HEDNA sets out the need for social and affordable housing within the borough. Would you support RBC both improving existing and developing new social and affordable housing (like the regeneration of Rounds Gardens and Biart Place)?

Yes

No

A: North Warwickshire have no detailed comments on this issue as this is a matter for Rugby Borough Council members and officers but seeking to deliver affordable housing is supported.

Q33: Please provide any comments you have on the suitability of any of the broad locations listed above for new housing. Are there any locations that we have missed?

A: North Warwickshire have no specific comments on this issue as this is a matter for Rugby Borough Council members and officers

Q34: The HEDNA also recommends that we require all new dwellings in all tenures to meet optional Building Regulations M4(2) standards for accessible and adaptable dwellings, which are similar to the Lifetime Homes Standards. It also recommends that at least 10% of homes to meet the higher M4(3) wheelchair user dwelling standards (with a higher proportion needing to meet this standard in the affordable sector).

Do you support a requirement for all new dwellings to meet the additional Building Regulations standard for accessible and adaptable dwellings and for at least ten percent of dwellings to be suitable for wheelchair users?

Yes

No

A: North Warwickshire have no detailed comments on this issue as this is a matter for Rugby Borough Council members and officers but seeking to deliver accessible and adapted housing is supported.

Q35: Please provide any comments you have on the type and size of new homes we need.

A: It is considered important to increase the numbers and standards of adaptable homes to enable and address broad housing needs, widening the supply of types and tenures, reducing need for future adaptations and retrofitting particularly for an aging population.

Q36: Are there any other issues or policies (not covered by the questions above) that we should cover in the new plan?

Yes

No

If yes, what?

A: North Warwickshire have no further specific comments on other potential issues as this is a matter for Rugby Borough Council members and officers.

Q37: Do you support our intention to bolster our policies on sustainable travel?

Yes

No

Q38: Do you support a policy protecting stadia as community and sports facilities? If so, which stadia should we protect?

Yes

No

If yes, which stadia?

A: North Warwickshire have no further specific comments on this issue as this is a matter for Rugby Borough Council members and officers.

