

Appendix 2b – short-form, questionnaire version of Local Plan Issues and Options document

An electronic version is available online at: rugby.gov.uk/localplan

Alternatively you can complete this form and return:

By email: localplan@rugby.gov.uk

By post:

FAO Development Strategy,
Rugby Borough Council
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CV21 2RR

Land for employment uses

We now have new, longer-term projections for the need for land for employment uses (offices, research and development, industrial and warehousing).

We need to think about how we can meet the projected need for employment land to allow the borough's economy to continue to grow.

The Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022 shows three components of future need for employment land. These are shown in the table below:

Type of employment land	Land needed 2021-2041 (in hectares)	Land needed 2021-2050 (in hectares)
Gross requirement for strategic warehousing land across Coventry and Warwickshire (this means land for warehouses of over 9,000m ² in floor area)	551ha	735ha
Net need for office land (Rugby Borough only)	5.2ha (4.2ha with hybrid working)	6.5ha
Gross requirement for industrial land (Rugby Borough only) (this includes smaller warehouses of up to 9,000m ² in floor area)	150.5ha	218.2ha

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

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

Given the low level of demand for office space within Rugby and viability issues related to the delivery of new office floorspace, accompanied with the increase in homeworking, only very low levels of office space should be planned for within the emerging Local Plan. The HEDNA report confirms that:

The stronger office markets in the sub-region are Coventry and Leamington Spa, and new-build development can be expected to be focused in these areas. Beyond these markets, rental levels mean that delivery of office floorspace is commercially challenging and may require cross-subsidy and/or public sector support/intervention. (paragraph 2.6)

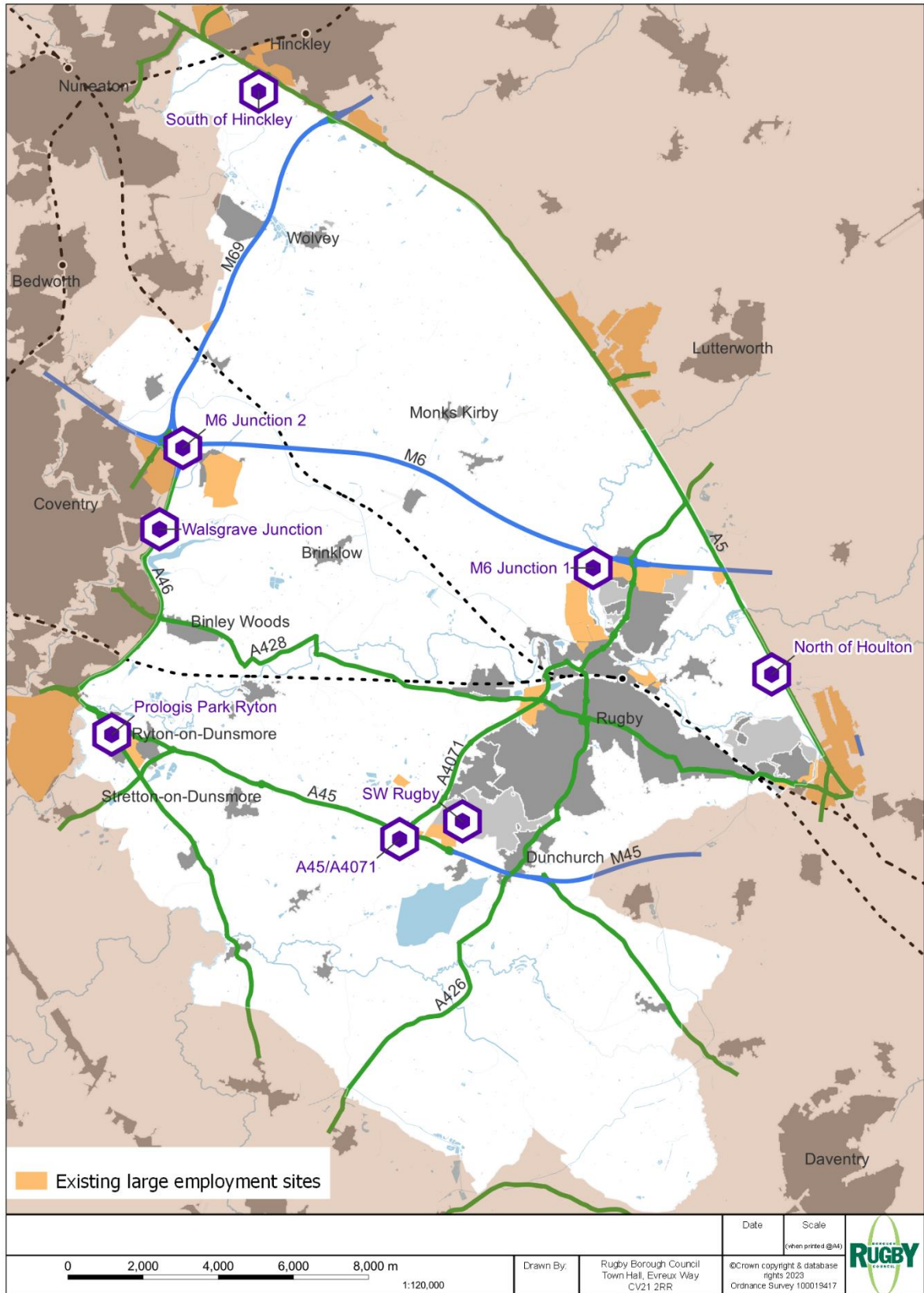
It is important that policies do not unduly protect existing employment uses which are no longer required. Policies should allow for the best use of land and allow investment to bring forward vacant and underused sites.

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We need to decide where to accommodate future employment land demand. Land for large-scale manufacturing and distribution uses needs to have good access to A-roads and motorways. This will avoid inappropriate routing of HGVs through residential areas and country lanes.

Large scale employment locations should be close to existing settlements to allow staff access to work.

Considering these restrictions, we have identified the potential locations shown on the map below.



Potential strategic employment locations

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

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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.

4. How can we provide more space to allow existing businesses to expand?

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5. 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?

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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.

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

Yes

No

Please explain.....
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Town centre regeneration

In 2020 the government introduced the Class E (Commercial, business and service) use class which replaced several former town centre use classes. The effect of this change is to give greater flexibility to change the use of town centre units without the need to obtain planning permission.

Considering this change, we propose deleting primary and secondary shopping frontage policies, which require a specified percentage of units in the identified frontages to be in the former A1 (retail) use class. We don't think this policy is workable following the introduction of the Class E use class.

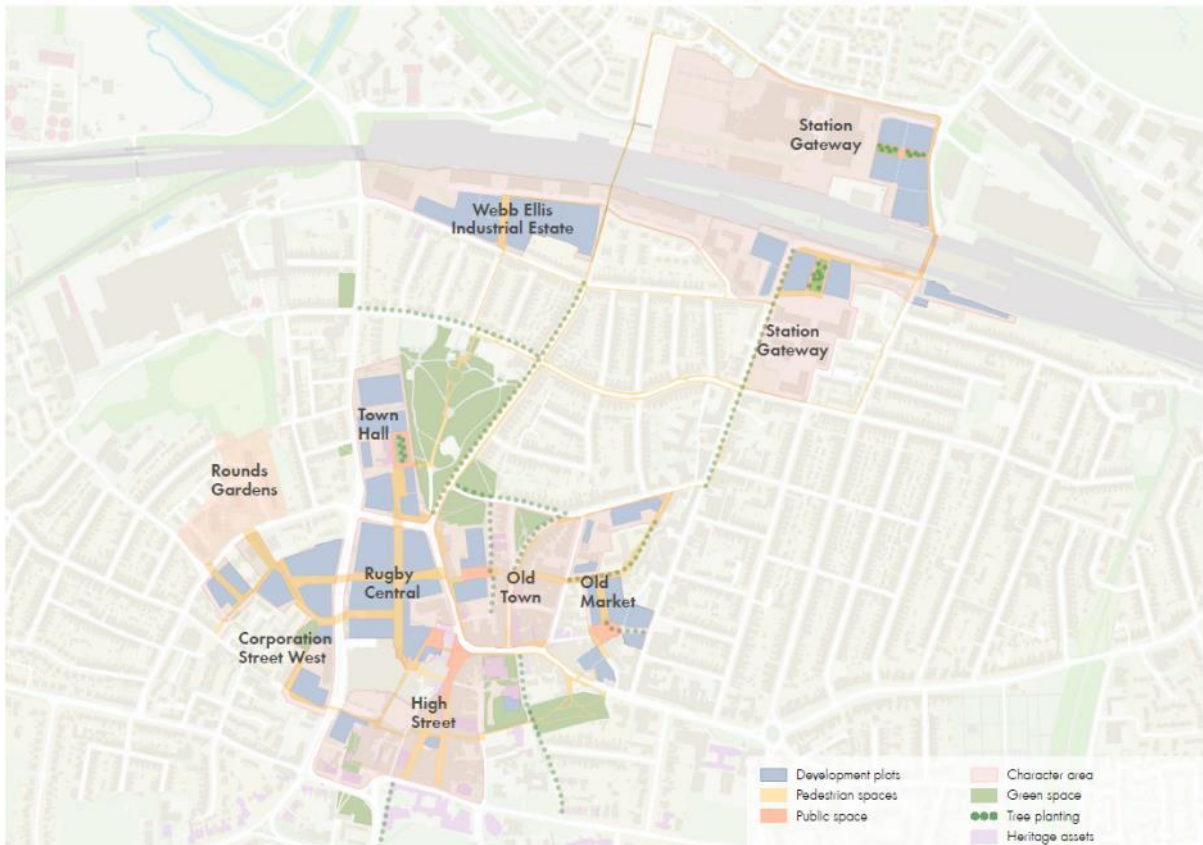
7. Do you agree with our proposals to remove the primary shopping area and primary and secondary frontage designations in Rugby town centre?

Yes

No

Paragraph 90 of the National Planning Policy Framework (NPPF) requires planning policies to define the extent of primary shopping areas and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre. The removal of the primary shopping area would therefore fail the tests in the NPPF. Primary shopping areas should therefore be retained through provisions within the development plan.

We propose to introduce site allocation policies for important redevelopment sites in the Town Centre Regeneration Strategy, to set out what the council want to happen on these sites.



Rugby Regeneration Strategy map of potential development parcels

Sites covered by site allocation policies could include:

- Rugby Town Hall, the Benn Hall, and Newbold Road Car Park
- Webb Ellis Industrial Estate
- Royal Mail and Mill Road Car Park
- Stagecoach, Railway Terrace
- Rugby Central
- John Barford Car Park, Old Market Place and Railway Terrace Car Park
- Rugby Borough Council depot on Albert Street
- North Street Car Park

8. Which town centre sites should have site allocation policies and what should they say?

Aldi object to the inclusion of the Cemex House site, Evreux Way, Rugby within any potential Rugby Central allocation, unless there is clear recognition of the

acceptability of retail use on the site and sufficient flexibility is provided in terms of how it is brought forward, reflective of the site constraints and viability.

The Cemex House site is the subject of a current planning for an Aldi food retail store application (reference: R22/1102) which is currently being considered by the Authority. The application lies within the Primary Shopping Area of Rugby Town Centre, where retail development should be focussed. The principle of the proposed development is supported by existing local and national planning policies.

The site is located within the Rugby Central area, within which the Regeneration Strategy anticipates development of 5-6 storeys. The Strategy goes on to state that:

“A range of town centre uses might be acceptable on the Cemex site. Regardless of use, it is key that this part of the site creates an attractive, active frontage to Corporation Street, Evreux Way and east-west linkages to Corporation Street West and the northern end of Rugby Central. Proposals should incorporate high quality public realm and streetscene, and support connectivity for pedestrians. Proposals should avoid the creation of sterile spaces, blank frontages and large impermeable development blocks.”

Viability appraisals undertaken by CBRE to support the application tested the following development options (as agreed with planning officers):

- Option 1: Office refurbishment (existing premises).
- Option 2: Demolition of existing premises and redevelopment of the Site for a mixed-use scheme comprising a foodstore plus offices.
- Option 3: Demolition of existing premises and redevelopment of the Site for a mixed-use scheme comprising foodstore plus residential.

The results of the viability appraisals demonstrate that the costs incurred in the development of the tested uses significantly exceed the value that would be generated by the potential development upon completion and generate negative residual land values.

The CBRE report therefore concludes that the site has no economically viable future as a location for employment uses or mixed-use schemes based on the alternative options assessed.

The CBRE report demonstrates that the form of development anticipated within the Regeneration Strategy for the Cemex site is unviable and undeliverable. We would therefore question what viability work underpins the regeneration strategy. We consider that in its current form, the Regeneration Strategy (which does not form an adopted Development Plan document) is too prescriptive, has not been subject to sufficient viability testing and would unduly constrain development and investment in the Town Centre rather than assist in bringing sites forward.

ALDI therefore object to the inclusion of a site allocation policy for the Rugby Central Area, unless this reflects the acceptability of retail use on the Cemex House site and sufficient flexibility is provided in terms of how it is brought forward. Aldi would also question the whether the Regeneration Strategy itself is fit for purpose. In its current form, the Regeneration Strategy risks hindering economic development within Rugby Town Centre and having a detrimental impact on the wider area.

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

Whilst Aldi would support the principle of a policy that seeks to improve the quality of streets and spaces, this needs to be carefully worded so as not to be overly prescriptive, to allow flexibility for appropriate forms of development, have regard to viability and consider sites on their individual merits.

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Currently the only town centre defined on the Local Plan policies map is Rugby town centre. No district or local centres are shown.

Defining local centres would help support new main town centre uses in these locations. It would also support the council in monitoring changes over time. However, it would not give the council added powers to protect units in the centres from change to residential use.

Rugby Borough has several local centres outside of Rugby town centre. Examples include Dunchurch, Clifton Road, Hillmorton High Street, Paddox, Bilton Main Street, Brownsover, Woodlands and Coton Park. There are other centres, not listed here that could also be considered.

10. **Should we define local centres? If yes, which centres should we include?**

Yes

No

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11. Are there other things the local plan should do to support local town centre regeneration?

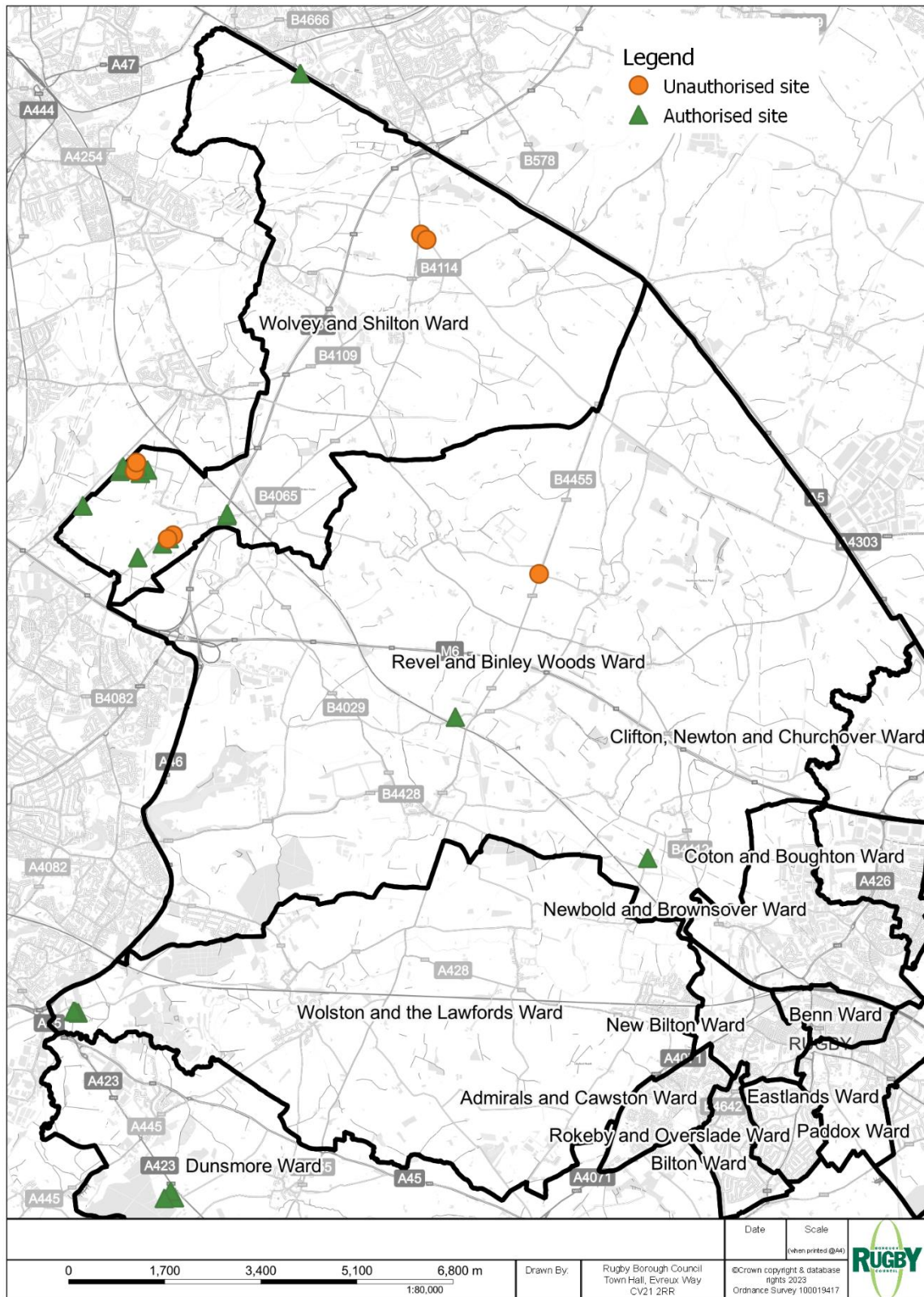
The Local Plan should take a positive approach towards town centres, promoting competitive town centre environments and proactively supporting sustainable economic development. The Local Plan should give consideration to site feasibility and viability to ensure that developments are deliverable.

The Local Plan should ensure that policies are not unduly restrictive and limit town centre investment and development. Policies should seek to support investment in town centre sites to bring underused and vacant sites back into positive use, such as the Cemex House site.

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Pitches for Gypsies and Travellers

We need to find pitches for Gypsies and Travellers to meet future needs.



Existing Gypsy and Traveller Sites

In September 2022 we published our Gypsy and Traveller Accommodation Assessment Study (GTAA).

The GTAA shows different targets based on two different methods for determining who is a Gypsy or Traveller. The first method used is the ‘ethnic definition’ which is based on the ethnic identity of individuals.

The second method used in the GTAA is the government’s Planning Policy for Traveller Sites 2015 definition (PPTS). The PPTS defines Gypsies and Travellers as persons of nomadic habit of life including those who have ceased to travel temporarily on grounds of their own or the family or dependent’s education or health needs or old age. It excludes those who have permanently stopped travelling.

The High Court has found the PPTS 2015 definition to be discriminatory, but it has not been withdrawn and remains government policy.

Period	Ethnic definition (pitches)	PPTS 2015 definition (pitches)
2022-2027	48	29
2027-2032	15	13
2032-2037	16	14
Total 2022-2037	79	56

12. 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

Please explain

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13. How can we find sites to accommodate the need for Gypsy and Traveller pitches?

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

(b) Regularise existing unauthorised sites?

(c) Create a new borough or county council-owned site?

(d) Other (please explain).

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

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15. 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

Please explain

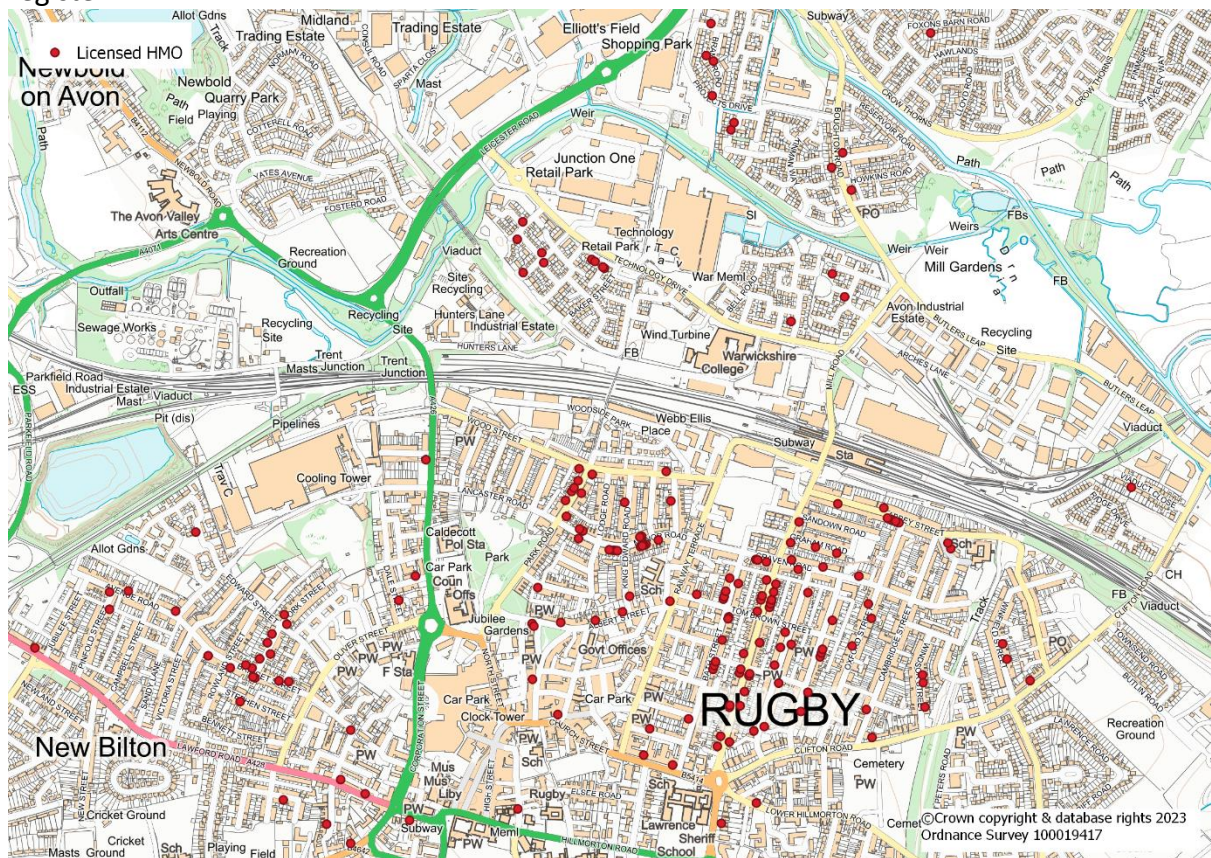
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Houses in Multiple Occupation

Houses in Multiple Occupation (HMOs) are homes occupied by three or more unrelated individuals who share basic amenities such as a kitchen or bathrooms.

Rugby town has experienced growth in the number and concentration of HMOs, particularly within areas of central Rugby. The current Local Plan 2011-2031 is silent on HMOs. There is a desire to introduce a policy on HMOs through the new local plan.

As of February 2023, there were 199 licensed HMOs in Rugby Borough as shown on the map below. Not all HMOs are licensed, as HMOs with fewer than five residents do not have to register.



HMOs in central Rugby

Nationally, concerns have been raised about concentrations of HMOs reducing community cohesion, putting pressure on parking, having untidy front gardens and bins, causing noise and disturbance, and increasing local rents. There is concern among councillors and residents in affected wards about these issues.

16. 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

17. 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

Please explain

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Climate change and Zero Carbon energy

Increasing renewable and zero carbon energy generation reduces carbon emissions, energy prices and our reliance on imported gas.

Our main renewable energy options are solar farms and wind farms.

The current Rugby Borough Local Plan does not show any areas as suitable for wind farm development. This means that at present new wind farms in the borough are blocked.

Solar farms and wind energy would be classed as inappropriate development in those parts of the borough which are Green Belt. This means that planning permission for solar farms and wind farms in these areas would only be granted if very special circumstances can be shown to exist.

We could take a more supportive stance to both solar and wind energy by identifying areas in which we would support new wind and solar energy generation. These could include locations along the A5 and motorways including highway verges and central reservations.

In addition to wind and solar, other zero carbon energy sources and technologies are likely to be important. These could include hydrogen energy infrastructure and battery energy storage systems.

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

Yes

No

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19. 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

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20. 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

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One option for updating our environmental policies would be for us to set a policy requiring new developments to increase tree canopy cover. Cornwall Council, for example, requires canopy coverage equal to at least 15% of the site area to be provided in all major developments.

In 2023 Friends of the Earth estimated, based on National Forest Inventory data, that just 4.5% of Rugby Borough is woodland. This places Rugby Borough in the bottom 20% of English local authorities for woodland cover.

21. Should we adopt a minimum tree canopy policy for new development?

Yes No

Aldi consider that a blanket policy on tree canopies is not appropriate as it does not reflect individual site constraints and opportunities and may therefore constrain appropriate development. The introduction of mandatory BNG provides a more appropriate route to improving biodiversity in a more holistic way. A tree canopy policy may result in a net increase in trees at the expense of a more balanced and site-specific appropriate biodiversity strategy.

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From November 2023 the Environment Act 2021 will introduce a requirement that development sites deliver at least a 10% enhancement on the pre-development biodiversity of the site. The priority is to deliver this improvement on site, but there is also a choice for the requirement to be met by improving the biodiversity of land elsewhere.

In our new local plan, we could specify priority locations or allocate sites for offsite biodiversity net gain. This option could support larger scale habitat restoration/creation, but it could reduce the flexibility of the market and Warwickshire County Council to decide where offsite gains should take place. If we don't specify priorities, potentially, net gain could occur in other counties and not within our borough.

22. 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

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

Yes

No

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

Yes

No

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In June 2022, the government’s updated Building Regulations 2021 came into effect with uplifted standards for building energy performance (Part L of the Building Regulations).

In 2025 the government will implement through the Building Regulations the full Future Homes Standard (FHS) and Future Buildings Standard (FBS). The FHS and FBS will ensure that buildings built after 2025 are ‘zero carbon ready’ which means that no retrofit would be needed for the homes to become zero carbon in the longer term as the electricity grid decarbonises.

Local policies can require buildings to be ‘net zero’ now. This is achieved by setting more stringent building energy performance standards requiring on-site renewable energy production to match energy consumption and, if that is not possible, requiring developers to make a financial contribution to a carbon offset fund set up by the council.

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

Yes

No

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

Yes

No

Aldi strive to deliver developments with high environmental credentials. All new Aldi stores incorporate a range of energy saving and efficiency measures, which minimise the energy demand and reduce CO2 levels arising from the development. ALDI’s approach to minimising energy use within its buildings reflects an energy saving hierarchy, similar to current best practice within the UK.

Where feasibility and viability allow, net zero developments should be encouraged.

This should be considered on a case-by-case basis having regard to the site specifics, feasibility and viability.

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27. Are there other climate change policies we should be introducing?

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Rugby Borough is in a water stressed area. We already though our local plan require that new dwellings meet the additional Building Regulations requirement to limit water use to 110 litres of water per person per day. Through the new plan we could extend water efficiency requirements to non-residential buildings. One way of doing that, proposed in the Greater Cambridge local plan, is to require non-residential buildings to achieve full credits for Wat 01 of the BREEAM standard.

28. **Should we require non-residential development to meet higher water efficiency standards to reduce water usage?**

Yes

No

Aldi strive to deliver developments with high environmental credentials. This includes water consumption where high water efficiency standards are aimed for.

Where feasibility and viability allow, developments should be encouraged to meet higher water efficiency standards to reduce water usage. This should be considered on a case-by-case basis having regard to the site specifics.

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Design

Since the current Local Plan 2011-2031 was adopted, the government has placed greater emphasis in national policy on the design quality of new development. We need to respond to that locally through updated policies. Design codes can also be introduced through Neighbourhood Plans.

One of the tools the government is promoting is the use of design codes. A design code is a set of illustrated design requirements that set specific, detailed parameters for the physical development of a site or area. This approach was supported, for example, in the *Building Better, Building Beautiful* Commission's report.

29. Should we produce design codes as part of our new local plan?

Yes

No

Depending on the coverage and nature of design codes, they should ensure that current development proposals are not impeded. Where there are current applications / proposals for investment these should be taken into account as part of the preparation of any design code.

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30. Which areas should design codes cover?

- (a) Borough-wide
- (b) Borough-wide divided into character areas (for example Rugby town centre, interwar suburb, Victorian terrace, village core)
- (c) only for some neighbourhoods (please specify which),
- (d) only for large new development sites
- (e) other (please specify)

Land for housebuilding

We have two different projections for how many new homes a year we could plan for in the next plan.

One is the government's standard method, the other is the Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA). The HEDNA uses more up to date information (including Census 2021) than the standard method which is based on 2014 data. The more up to date data shows higher population growth in Rugby and lower population growth in Coventry.

The difference between the projections for the number of homes we will need each year is shown in the table below. For comparison, under our current plan we are planning for 620 new homes each year.

	Coventry	Rugby	Total for Coventry and Warwickshire
Standard method	3,247	506	5,602
HEDNA 2022	1,964	735	4,906

The HEDNA shows a higher need in Rugby but a lower need in Coventry and in Warwickshire as a whole. Adopting the HEDNA number across Warwickshire would reduce the likelihood of us needing to accommodate unmet needs from Coventry, as we did in the current plan.

We already have a lot of new homes in the pipeline, particularly at the South West Rugby and Houlton urban extensions. Taking the existing supply into account, here is the additional housing supply that we would need to allocate land for:

	Standard method	HEDNA 2022
If we plan to 2041...	0	3,114
If we plan to 2050...	795	8,101

31. How many homes should we be planning for?

- (a) Minimum local housing need
- (b) The HEDNA 2022 need
- (c) Other (please specify)

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The HEDNA sets out the need for social and affordable housing within the borough.

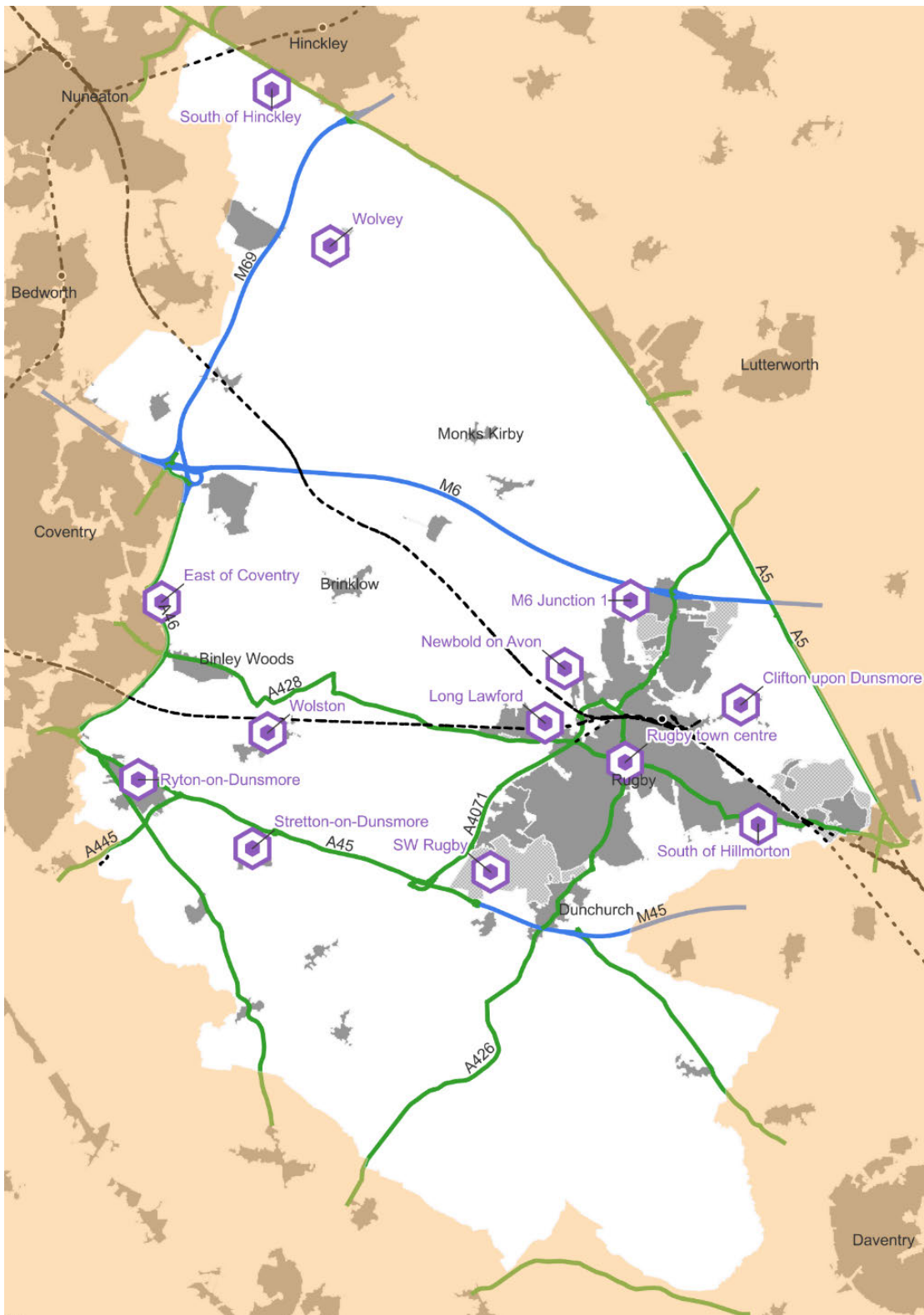
32. Would you support RBC both improving existing and developing new social and affordable housing (like the regeneration of Rounds Gardens and Biart Place)?

Yes

No

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We do not know yet which land will be put forward as potentially suitable for housing development. The below map shows some of the broad locations in which housing could be built.



Potential housing locations

33. 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?

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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).

34. 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

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

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Other topics

The issues and options document focusses on seven big planning issues facing our borough. Please use the consultation question below to highlight any other planning issues or new policies you think we should include in the new plan.

For example, we intend to increase the emphasis on sustainable travel to accord with Warwickshire County Council's new Local Transport Plan 4 and the forthcoming transport plan for Rugby Borough to be produced by Warwickshire County Council.

We are also considering introducing a policy to protect stadia as community and sports facilities.

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

Yes

No

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37. Do you support our intention to bolster our policies on sustainable travel?

Yes

No

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

Yes

No

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