



Rugby Borough Council,  
Town Hall,  
Evreux Way,  
Rugby  
CV21 2RR

February 2024

Dear Sir/ Madam,

**Rugby Issues and Options document**  
**Local Plan Review 2024**

Warwickshire Wildlife Trust (WWT) supports the general intentions of the Local Plan Review, however push for stronger, more robust environmental policies, that are more ambitious and go further as set out below.

The Local Plan needs to push for further environmental enhancements in line with the legal requirements set out in the NPPF, 25 year Environment Plan, the Governments commitment to 30% land in nature recovery by 2030, COP 27 and COP 15 and the Councils declared climate change emergency.

**Chair**  
Crishni Waring  
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## **National Planning Policy Framework**

The National Planning Policy Framework sets out a legal requirement Paragraph 20d) which **requires ‘conservation and enhancement of the natural...environment, including landscapes and green infrastructure,** and planning measures to address climate change mitigation and adaptation’

Paragraph 175. Requires Councils ‘take a strategic approach to maintaining and **enhancing networks of habitats and green infrastructure;** and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries’.

Warwickshire Wildlife Trust is pleased to see reference to the declaration of a climate change emergency by the council, the introduction of the Environment Act 2022 and its requirement for biodiversity net gain. However the Plan need to therefore ensure that it goes further to meet these legal requirements particularly for enhancement.

## **Biodiversity Net Gain**

WWT is pleased to see reference to a higher biodiversity net gain in 7.25, however the plan already mentions viability restraints and issues at this early stage before the issue has been fully explored.

These plans should be more ambitious and now be looking to achieve **20% Biodiversity Net Gain** which we propose due to the significant shortage in the wider area. This is in line with Councils declared climate emergency.

Also numerous other Councils have now got policies through Examination with ambitious local policies including 20% net gain as has been done in Worthing Borough Council (West Sussex), Cornwall and Greater Cambridgeshire. As well as a number of local schemes where more ambitious net gain has been achieved such as at the Rugby mast site, where higher net gain has proven viable.

10% is just the emerging national figure, we need a more locally representative figure. It will also attract more investment through green tourism/more green space/health benefits and bring in economic benefits.

## **Nature Recovery Strategy**

The emerging Plan should include a separate policy on the legally required *Nature Recovery Networks*, and consider the Wildlife Trusts new wider *Wildlbelt policy* to protect key land for nature recovery.

Areas could be set aside though the use of such a landscape designation. As there needs to be a clear evidence of how the Councils will achieve the Governments targets of ‘30% of land in environmentally sensitive management by 2030’ and in the ‘Pledge for Nature’ with the United Nations and UN Sustainable Development Goals, as well as the commitments in the 25 year Environment Plan.

The plan needs a clear policy for how the Council will achieve this legal requirement and plan making is a key opportunity to achieving this.

### **Local Wildlife Sites**

In order to meet national requirements and targets set out in the 25 year Environment Plan, COP15 biodiversity framework targets, and the Government's commitment to have **30% more land in nature recovery by 2030**, there clearly needs to be a specific policy protecting existing biodiversity and importantly other **non-designated sites such as Potential Local Wildlife Sites**, Nature Reserves and Ecosites, particularly rivers and brooks.

It is also very important to include a policy not just conserving but on **enhancing** these important sites.

### **Employment**

WWT considers that the Council need to ensure that new employment allocations are balanced with protecting environmental assets. We consider that the figure should be a lot lower and not encourage large B8 units which take up swathes of important environmental assets and local countryside.

WWT is disappointed to see that as much as 735ha new employment land is apparently needed up until 2050, which seems to have been grossly exaggerated, and needs to be balanced with the need to preserve the local environment and at risk habitats across the area.

The Council needs to reconsider the added 98ha of need from Coventry City Council's area, as this additional need puts pressure on important nature recovery areas, and near statutory and non statutory environmental designations.

Employment targets and sectors also need to be chosen in light of the fact that in 2019 Rugby Borough had the 33rd highest carbon dioxide emissions per person of 333 English local authority districts.

The plan must emphasise the importance of biodiversity and green infrastructure in the general wellbeing of a city, highlighting a need to increase tree coverage, wildlife-friendly buildings and create new green spaces to improve health indicators and provide climate resilience.

This includes street hedges/bus stop green roofs/ SUDs/ wildflower verges perennial not annual/ ivy on railings etc.

### **Section 7 Climate change**

WWT is pleased to see a section on Climate change, although biodiversity also needs a separate section within the plan and shouldn't be lumped together.

Pleased that it states, 'we also need to set out how planning can contribute to the borough becoming net zero carbon by 2050, in line with the national government target'. Although look forward to seeing clear targets and strategies as to how this will be achieved.

Very worrying that in 2019 Rugby Borough had the 33rd highest carbon dioxide emissions per person of 333 English local authority districts. Clear targets and policies need to help reduce this.

Whilst we support the principle of renewable energy, solar farm allocation would need to be carefully chosen to ensure they don't impact on important habitat corridors, and nearby wildlife designations.

### **Housing allocations**

Q31. How many homes should we be planning for? (a) Minimum local housing need (b) The HEDNA 2022 need (c) Other (please specify)

The Council should only allocate a) *the minimum housing need* as any unrequired extra would put serious pressure on important nature recovery areas, and green wildlife corridors, as well as encroach on important designated and non designated wildlife sites.

Crucially the Council needs to ensure that new sites allocated for future housing need aren't near to important environmental assets and green infrastructure corridors.

More stringent standards to address climate change need to be introduced to ensure that net zero targets can be achieved.

The Council should consider sustainable design methods such as green roofs, street tree planting, community allotments, solar panels, bus stops public transport, bike storage, cycle paths, bat/bird boxes or bricks. Flood safety/ self cooling/ air quality wood burners/ ground SH and Electric charging.

### **Neighbourhood Plans**

There is a legal requirement for Councils to support the development of Neighbourhood Plans in their district.

These are great mechanisms for delivery local environmental policies, and for local communities to get on board and allocate additional *Local green space*, nature reserves and Local Wildlife Site designations.

The council needs to do more to encourage and support local communities to put together their own plans and through a supporting local plan policy.

### **Green Infrastructure**

7.26 provides limited information of the review or update of this section. Are there any intentions to update your evidence base locally, the GI strategy is outdated from 2008.

Local plans should also include an up to date and detailed evidence base to identify the detailed corridors and where enhancements should be made in detail.

The full detailed GI study was produced back in 2008, open space SPDs go into limited detail on this subject.

There also needs to be more detailed reference and a separate policy on the emerging '**Nature Recovery strategy**' which is now a legal requirement for all council areas set out in the Environment Act 2021.

We support the Council including a tree canopy target such as Cornwall Councils which goes further, in its recently adopted Climate Emergency DPD, by requiring canopy coverage equal to at least 15% of the site area to be provided in all major development.

WWT is extremely concerned that Rugby Borough is in the bottom 20% of English local authorities for woodland cover. The council needs strong and ambitious policies to help turn this around.

7.32 WWT strongly support that 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.

### **Flood risk**

We need a policy on more natural based solutions to allow natural flooding and drainage through permeable surfaces and gardens. Needs more rain water harvesting and better house design with grey water features. As the rivers are already reducing by around 30%.

7.39 WWT strongly support that through the new plan Rugby could extend water efficiency requirements to non-residential buildings. And that 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.

### **Question 23**

**Would you support the creation of additional country parks as part of delivering biodiversity net gain?**

County parks are often noisy, busy, sites which allow access to dogs, and noisy play areas. Areas for biodiversity net gain, should be for that purpose and as such managed to conserve and enhance wildlife and important habitats.

However support allocation of additional land for biodiversity net gain and over the 10% as numerous other councils have proven is viable.

### **Overall**

WWT is keen to see 20% Biodiversity Net Gain explored fully at this stage in plan making, which has been proven to be viable and is necessary due to the significant shortage and Government targets.

The emerging plan needs a separate Nature Recovery Strategy policy and also a separate 'Wild belt Policy'.

GI evidence base needs updating and feeding into strong enhancing policies.

Need a policy preserving and enhancing potential Local Wildlife Sites and other important locally designated sites.

[REDACTED]

