



THURLASTON
PARISH COUNCIL

Rugby Local Plan Consultation

This is the response of Thurlaston Parish Council (TPC) to the invitation from Rugby Borough Council to respond to their consultation document 'Rugby Borough Local Plan, Issues and Options' of October 2023. We deal with the topics identified in that document in the order in which they appear.

LAND FOR EMPLOYMENT USES

TPC notes that RBC are aiming for 208 ha, of which 159 have been supplied, taking 98 from Coventry.

TPC opposes any further expansion of SW Rugby (Symmetry Park). It has already compromised the rural environment of Thurlaston and further development would destroy it entirely.

TPC also opposes development at the A45/A4071 (Blue Boar) junction. This junction is currently over-used. At rush hours it is a bottleneck for traffic from the eastern direction wanting to turn right to join the western relief road going north towards the M6 (and then M1) junctions. It is also a bottleneck for traffic going in the opposite direction. At busy times long queues form in both directions. The situation will be made even worse by traffic from Symmetry Park and that from the A4071 arising from Warwick County Council's minerals plan, which will exploit the gravel deposits close to the straight mile. Whilst the outline permission for the Symmetry Park development was predicated on the Potsford Dam link road running north directly to the roundabout on the western relief road, TPC were informed on 7th December by Jonathan Dawes of Tritax Symmetry that his company had no intention of building this link themselves and that their additional traffic would be supported by the exiting road links.

Thus development at the A45/A4071 site would not be feasible except at unacceptable cost to the local community.

Warehouse development is among the 'bottom feeders' of the employment chain providing little skilled employment and no particular links to the surrounding community beyond proximity to the road network. Since outline permission R16/2569 for the SW Rugby Tritax development was granted the technological and commercial warehousing environment has changed according to Jonathan Dawes. In particular, there is the much greater use of warehouse automation. This reduces the already meagre employment density (i.e. people employed / hectare) much further. It is clear that warehousing is a very poor choice of development from an employment perspective.

TPC would prefer RBC to play to Rugby's commercial strengths, for example in engineering, and encourage higher-value employment opportunities. For this we suggest you discuss what the current employers in this area (which range from the large such as Alstom or Colas to the many small ones such as Menrica, Arturn and Lench) would like to see.

TOWN CENTRE REGENERATION

TPC have no objection to proposals for removing the primary shopping area and primary and secondary frontage designations in Rugby town centre and encouraging more mixed usage.

However, we think that a financial package aimed at supporting small retailers would be needed to make Rugby competitive with Leamington Spa and Stratford-upon-Avon as a shopping destination.

We support improving the town centre environment and suggest that tree planting and better quality street architecture would make a significant difference.

We also suggest including other local centres such as Bilton and Dunchurch in the regeneration plan.

PITCHES FOR GYPSIES AND TRAVELLERS

TPC does not agree that the target of 79 pitches should be preferred to the PPTS one of 56 pitches on the basis of a single court case, albeit one in the Court of Appeal. Judgements in such matters are based on the particulars of the case, not on general policy intentions. What's right for one case may not be for another.

It will not be easy to meet even the lower pitch target, and we suggest that the local plan be realistic in this respect. Site allocation as part of permission for local employment or housing seems a good idea, but the track record of developers fulfilling prior infrastructure commitments is poor, whether it be sticking to agreed building heights or new roads. There is no plan to ensure that developers' commitments are actually met.

It would be sensible in our view to regularize existing unauthorized sites wherever possible and provide them with basic amenities such as waste collection and metered power, water and sewerage.

In seeking new sites, choice of size is a matter of opportunity and local need. The GTAA makes some suggestions as to pitch size in sections 6.13 and 6.14, but these amount to little more than a statement of the obvious. We suggest that sites larger than the minimum 0.05 ha would be needed to meet the needs of extended traveller families, and that this could be judged by looking at the existing sites and discussion with the travellers themselves.

HOUSES IN MULTIPLE OCCUPATION

TPC recognises concern about HMOs degrading the environment that they are in. Article 4 directions and limiting their number and density addresses this problem, but not the issue of the short term and inexpensive accommodation that they provide. There is a clear need for accommodation of this type for students or workers in low paid employment – such as warehousing. The local plan should address the need for this as well as the means of providing

it, be it from Housing Association blocks, Council provided accommodation or HMOs. TPC opposes the blanket restriction of HMOs without this need being addressed.

CLIMATE CHANGE POLICIES

TPC supports addressing issues of both causing and coping with climate change more strongly in the local plan.

In principle, we support encouraging the development of more renewable energy sources, particularly solar power, but think that wind power needs to be considered more carefully. Looking southeast from Rugby, the skyline is already disfigured by wind turbines and adding more would degrade our environment further. So this needs to be carefully balanced against the need for such power and especially whether it could be used effectively in view of National Grid's current transmission and storage limitations. Extensive consultation with those affected would be required.

We support enhancing the energy infrastructure through more storage and better transmission facilities, but wonder whether this is really in the bailiwick of the Local Plan rather than National Grid.

TPC strongly support the retention of our rural and bio-diverse environment, the protection of it elsewhere and the growth of it where possible. This includes the tree canopy policy for new development and balancing the environmental degradation wrought by development with green spaces and new planting. In our view this should be a priority.

TPC supports a low or near-zero carbon policy for new building, but questions whether policies such as prohibiting the provision of a gas supply are useful. More than half (57%) of the UK's electricity is generated from natural gas. Burning it at a power station, converting it to electricity, transmitting it to home, office, or factory and then converting it back into heat may not be environmentally sensible. It is certainly not economically so.

Better insulation on the other hand is clearly worthwhile.

The other side of the coin is coping with climate change. Here the Local Plan does have a role in specifying better standards for dealing with it. There are now more frequent episodes of heavy rainfall, so improvement to drainage from roofs, roads and other hard standing are needed. This trend will continue as will the frequency and ferocity of storms. Higher construction standards are needed to reduce the concomitant storm damage and disruption. These can be implemented as a matter of planning policy.

TPC note that the recent extreme weather conditions have exacerbated road damage and that more prompt attention to potholes and the like is needed. There is a consequent increased need to look at transport policy and the provision of fit-for-purpose road links and public transport.

DESIGN CODING AND GUIDANCE

TPC supports enhanced design codes for the whole of Rugby borough. We can see no reason why they should be applied to one district and not another. For example, conformity to, or sympathy with, existing styles could be built into borough-wide codes without the need to specify, say, Victoriana for one street and not another.

We support code enhancements which improve the appearance, durability and experience of new development. Whilst we appreciate that compiling new codes is a detailed and difficult task, we wonder whether other councils faced with the same problem have already produced such codes and whether RBC could take advantage of this.

The issues facing Rugby are shared by towns elsewhere in the UK and it would be pointless to re-invent the wheel by employing consultants to devise a bespoke design codes just for us.

LAND FOR HOUSEBUILDING

The current plans seem reasonable and on track for meeting a fair midpoint between the government's standard method of calculating need and the HEDNA of 2022. There is no reason why Rugby should accommodate Coventry's inability to provide housing and whether this would be sensible in any event given the increased emphasis in reducing unnecessary travel. Taking Coventry overspill out of the Local Plan neatly brings the current plan up to what is required by the HEDNA – giving 760 new homes/year which more than meets the HEDNA of 735.

TPC notes that the South West Rugby development has already been approved, but none of the houses have yet been built. It would not seem reasonable to expand this development further given the environmental impact of the current plans.

We would encourage the greater use of brown-field sites within the borough, such as that adjacent to Binley Woods, for housing. Developers' profit margins are eroded by the cost of cleaning these sites, but this is a public benefit which the Local Plan should mandate.

OTHER TOPICS

There are other issues which we think should be revisited in the Local Plan that have not been explicitly discussed in the consultation document. Most prominently, transport deserves more attention.

The road network in and around Rugby town is close to breaking point. One small disruption such as road works can cause severe bottlenecks and jams. The western relief road is barely fit for purpose as is access to the railway station. Serious improvements need to be considered.

Public transport is in an even worse state outside the town centre. There are, for example, no bus services from the railway station to outlying villages such as Thurlaston. Rail users need to use their car or take expensive taxis. We advocate taking public transport into the Local Plan.

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