

Response to Rugby's Local Plan Consultation - January 2024

Stretton on Dunsmore Priority Issues

The Rugby Local Plan seeks responses on a variety of issues and proposals and, on behalf of the village of Stretton on Dunsmore the Parish Council is structuring its response to show those issues which will be of prime importance and concern to our residents first.

This document was agreed at the Ordinary Parish Council Meeting which took place on 8th January 2024

1. Land for Housebuilding

31. *How many homes should we be planning for?*

(a) *Minimum local housing need*

(b) *The HEDNA 2022 need*

(c) *Other (please specify)*

The approach adopted in the previous plan showed a total disregard for local views and issues. Stretton on Dunsmore **supported** development in our village as long as it was located sensibly and provided homes of the right type, i.e. starter homes and homes for older people.

Despite numerous representations, including at the Inquiry, pointing out the unsuitability of building on green belt on Squires Road and Little Orchard due to access issues and the potential to increase flooding and support for another site on less valuable agricultural land those sites were agreed. Since then, numerous problems have emerged with access and now drainage and not a single home has been built.

Now, yet again, Stretton on Dunsmore appears on the map as a potential location for yet more development and we are told that if we do not volunteer sites they will likely be imposed anyway.

Before any recommendations are made the Parish Council would urge RBC representatives to actually visit the village and see exactly what the issues are.

Issue 1 - Access

Stretton on Dunsmore might be a "large rural settlement" but it has an historic village centre and there are narrow roads and access issues that need to be taken into consideration when looking at further development. This is why the residents, and Parish Council, supported a different location in the previous consultation.

The centre has no pavements and little off -road parking such that there is considerable congestion and danger to walkers, cyclists and horse riders (of which there are many). Children walking to and from the school to the church (it is a church school) and their homes pass through the village centre several times daily.

The village is accessed by primarily single-track roads being

- Freeboard Lane and FIneacre Lane from the Oxford Rd
- Brookside (rendered single lane because of parked cars) and Knob Hill from the Fosse Way
- School Lane is two ways but opens onto the A45 so can only be used to exit the village in the direction of Coventry

Issue 2 – flooding and drainage

The village is also subject to flooding from the brook and also water running down the lanes into the village centre. There have been several near misses but serious flooding occurred in March 2016 and again on 2 January 2024.



Figure 2 - the village centre



Figure 1 Brookside lower end



Figure 4 Brookside looking back to the village centre



Figure 3 Outside 20 Brookside

The Parish Council also now know that the drainage system for Stretton on Dunsmore is one of the worst in the local area with the pumping station downstream from the village regularly pumping raw sewage into the brook even when it is not raining.

It was recently reported in the press that one of the worst local examples of release of sewage is occurring into Princethorpe Brook where under Permit number: S/12/07742/O the pumping station reported a sewer storm overflow whereby it spilled raw effluent **85** times during 2022 for a total of **1164.29** hours, over 49 days,¹ into the Princethorpe Brook. In the Severn Trent area Princethorpe Brook is 31st in terms of severity of such releases and when one considers that the ST area covers some large towns and cities and large rivers that is worrying indeed. Clearly the current system cannot cope with the effluent from the existing properties let alone the nigh on 100 approved in the previous plan.

¹ Source The Environment Agency

It is the view of the Parish Council, that the outline planning permission for homes on Squires Road and Little Orchard should never have been agreed and should now be revoked. Furthermore, any future allocation of land for building should not be even considered until the drainage system is confirmed as being capable of handling further output.

More generally, the whole approach to residential development is wrong. Coventry's demands for its neighbours to accommodate its overspill, when it was clear that the basis for the city's unsupportable growth was erroneous, has led to over-development across Warwickshire. The duty to cooperate does not mean a duty to agree. This excess should be removed from Rugby's 'need'. As shown in the LP (first table in paragraph 9.23), there is no need for any additional supply of land for house building to meet the local housing need up to 2041.

Furthermore, the approach does not comply with the revised NPPF. When the equation between average incomes and average house prices is out of balance, the answer should be to create higher skilled, higher paid jobs (as described in Appendix A on Logistics), not to build more houses, most of which will be unaffordable, and more warehouses. Applying uplifts and supply buffers to housing 'need' is unjustified. Using 2014 data as the basis for a plan stretching to 2041 makes the plan very high risk. It is foolhardy to attempt to plan beyond then, up to 2051, when the SA acknowledges (SA paragraph 5.5) that impacts from Covid-19 and Brexit are long-term and are not fully understood.

In addition, sites that were previously designated for building houses, but which proved to be undeliverable should be repurposed such as to increase tree cover and biodiversity or returned to green belt. This is necessary because the NPPF requires² a plan to be deliverable. An example of such a site is given in Appendix B.

² NPPF paragraph 16b

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, so long as major new social and affordable housing is primarily within existing urban areas and, in particular, where there is good public transport. All social and affordable housing must be designed for low-carbon energy from the start.

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?

There is no need for any additional supply of land for house building. While the text (LP paragraph 9.25) recognises the potential for more housing within the urban area, the accompanying map shows locations scattered across the whole district. Experience shows that new houses built outside the urban area (e.g. in villages) fail to meet the need for genuinely affordable houses. The policy should be that any additional housing should be within the urban area.

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

Social housing is the most urgent need and this should be within the urban area. More 'executive' houses outside the urban area are NOT needed and should not be supported.

There is also a need for more housing suitable for an ageing population. Stretton on Dunsmore highlighted this in our previous response and yet both applications for the two sites approved in the plan contained yet more "executive homes", something this village does not need.

2. Pitches for Gypsies and Travellers

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?

The Parish Council is aware that Warwickshire says it has been told to provide more pitches but looking at the distribution of authorised and unauthorised sites there is definitely a big concentration in the Ryton and Stretton area. There are four unauthorised sites near Stretton village, and the Parish Council does not think there should be a general strategy of approving unauthorised sites, that would only encourage further incursion and setting up of unauthorised sites.

However, it has to recognise that once travellers have settled on a location, even if unauthorised, moving them is difficult and any other use of the land problematical as they would likely make it difficult and, in any case, they may own the land in question and it would be of little value for anything else.

In addition to the sites already in use of particular concern has to be the Old Bull and Butcher site which is for sale with planning for a care home, it is very unlikely that anyone would want to do that and given the state of it (fly tipping etc) and the Parish Council would vehemently resist any suggestion that the existing sites be extended any further.

On behalf of our community, the Parish Council proposes that there needs to be a maximum size of site within a parish and restrictions within say 5 miles, so that there will not be concentrations of sites with large numbers of travelers in adjacent villages. That needs to be agreed between the community and the council and all to agree that under no circumstances should that be breached.

Subject to this we could support the borough council suggestion of a properly set up council run site elsewhere in the county (ie not on the Old Bull and Butcher site) alongside a case by case consideration of some expansion of existing sites (if there is capacity once the maximum size has been agreed) with an understanding that no more pitches would be allowed thereafter and that any unauthorised expansion will be dealt with firmly.

Furthermore, existing sites, for example along the A423 near Ryton, are not fully utilised. Over time, more unoccupied space appears in these locations so the calculated theoretic demand is clearly not there in practice. The results from the two different theoretical calculations show a difference of more than 40% in quantity 'needed' so they cannot be considered to be sound. Before any further land is allocated, or sites expanded, monitoring data is needed to show occupancy of existing sites and occupancy trends.

Stretton on Dunsmore response to the remainder of the consultation

The imperatives for producing a new local plan at this time are the legal obligation to review a local plan after 5 years and the climate change emergency and the requirement for biodiversity net gain. Despite the claim on Rugby's website that climate and nature policies are being considered for embedding throughout the plan, they are not yet pervasive throughout the documents being consulted upon. The commitment to carbon net-zero must be a driving force in every aspect of the plan, not just treated as a single issue. Biodiversity gain must also be considered in many aspects of the new plan. The Local Plan Issues and Options document was published before the revised NPPF - it is also essential that the Local Plan is changed to comply with the NPPF published in December 2023. This requires plans to *“shape places in ways that contribute to radical reductions in greenhouse gas emissions”* - the Local Plan Issues and Options fails to propose radical solutions: it is not progressive enough.

The focus of this part of our response is on these overarching imperatives. The main concern is that the various chapters and documents appear to be developed in isolation without recognition of interlocking problems and the possibility of more effective solutions. Two topics with far-reaching implications are analysed in detail after responding to relevant chapter-by-chapter questions.

The response below refers to the Sustainability Appraisal Scoping Report ('SA') and the Call for Sites Proforma ('CfS') as well as the Local Plan Issues and Options ('LP'). All references to the NPPF are to the revision published in December 2023. There are gaps in the numbering because only those questions with answers are included below.

Employment Land

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

The LP continues a business as usual approach instead of adopting policies for **radical** reductions in greenhouse gas emissions. The revised NPPF specifies³ that plan-making should mitigate climate change by making effective use of land in urban areas, especially through the recycling of urban land. The SA recognises that it is necessary to diversify the economy in order to regenerate the local economy and improve employment and skills opportunities. It is counter-productive to propose the continuation of past trends in providing more land for employment outside the urban area and overly dependent on road transport. That approach is not justified - it undermines the adopted Local Transport Plan (LTP4) and conflicts with multiple Sustainability Objectives.

The LP shows that there is an over-supply of employment land up to 2041 in the current local plan. The SA acknowledges that impacts from Covid-19 and Brexit are long-term and are not fully understood so it is foolhardy to attempt to plan beyond then, up to 2051, when economic circumstances and employment requirements are changing rapidly.

Coventry's demands for its neighbours to accommodate its overspill, when it was clear that the basis for the city's unsupportable growth was erroneous, has led to over-development across Warwickshire. In the current local plan, almost half of the allocated employment land was to accommodate Coventry's over-stated need. The duty to cooperate does not mean a duty to agree so the Coventry excess should be removed from Rugby's 'need'. There is no need for any additional supply of employment land up to 2041.

² NPPF paragraphs 11a) and 143

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

The revised NPPF specifies³ that plan-making should mitigate climate change by making effective use of land in urban areas, especially through the recycling of urban land. The LP shows that Rugby is already over-supplying new land for employment in the current Plan. It is essential that the LP complies with the NPPF policy and stops the over-allocation of land for development, particularly land outside urban areas.

Development in urban areas can help to reduce the need to travel and contribute to productivity and regeneration. The revised NPPF emphasises⁴ the need for innovation and improved productivity. As described in Appendix A on Logistics, the emphasis in the LP on provision of even more warehouses in locations that are optimised for road transport fails to meet these priorities - it is contrary to policies in the NPPF⁵.

This critical issue is illustrated in the consultation documents. Although the LP recognises the critical need to take action on climate change, it fails to take radical action even though the documentation confirms that:

- the transport sector is the largest emitter of greenhouse gases and transport emissions have remained static while other sectors have improved;
- as other sectors are more effective in reducing their global warming impacts, transport is **increasing** its share rapidly: an increase from 22% to 25% of the total by 2019;
- Rugby's carbon dioxide emissions per person are in the worst 10% in England even before emissions from large industrial sites, motorways and railways are taken into account.

A **radical** change is necessary.

It is incorrect to claim that emissions from large industrial sites and transport are outside of Rugby's influence as a local authority. The predominance of logistics facilities in Rugby district already generates considerable road transport movements, attracting heavy goods vehicles and increasing carbon emissions in the district. Unfortunately, the LP focuses on increasing warehouse capacity still further and identifies sites that are optimised for road transport. This will inevitably lead to further increases of road transport emissions, contrary to the imperative to drive to net-zero.

As described in Appendix A on Logistics, the LP recognises that Rugby already has the highest proportion in the country of business units used for transport and warehousing. Even though it recognises that sustainable land use is one of the most effective ways of responding to climate change, it goes on to propose the continuation of past trends in providing more land for warehouses. It identifies potential employment sites near the strategic road network - such sites are clearly targeting warehousing and road transport. Even before Coventry and Warwickshire's "strategic warehousing need" is included, the LP devotes considerable effort in trying to justify more warehousing, leading to the allocation of vast tracts of land outside the urban area.

³ NPPF paragraphs 11a) and 143

⁴ NPPF paragraph 85

⁵ For example, paragraph 109 in NPPF

The NPPF requires⁶ significant adverse impacts on sustainability objectives to be avoided. Stopping the development of even more warehouses for the transport of goods by road would help with the SA objectives of

- reducing greenhouse gas emissions (SA Issue 1),
- reducing traffic-borne air pollution (SA Issue 2),
- developing brownfield land in urban areas in order to reduce the pressure on green field sites (SA Issue 2),
- facilitating diversity of the economy (SA Issue 3) and
- ensuring a green recovery from Covid and Brexit (SA Issue 3).

The LP should only allocate more land outside the urban area if it is genuinely for use with more sustainable transport such as rail.

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

The NPPF section on Making Effective Use of Land requires⁷ that there are clear policies to make as much use as possible of brownfield land. The LP fails to meet this requirement and appears to promote new development on greenfield sites.

Already there is an excessive amount of warehousing on the A45 corridor stretching from the M45 junction at Dunchurch through Ryton to the Coventry Gateway on the border of Rugby/Warwick/Coventry authorities. These warehouses generate considerable traffic, in particular HGVs, on rural roads such as the B4455 (Fosse Way), A423, A4071, B4453 and B4429. In places, these roads are narrow with sharp bends and difficult junctions and they go through villages - they are unsuitable for HGVs which have an unacceptable impact on local roads⁸. Section 106 planning obligations on routing of HGVs are not an effective control in practice. This problem is exacerbated by WCC's adopted Minerals Plan which plans major new quarries along the A45 corridor. In particular, the proposed new site at the A45-A4071 intersection, which is in the Green Belt, should be removed.

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

Growth must be consistent with the imperative of carbon net-zero. Rugby's plan must not undermine LTP4 with its policy of mode shift to more sustainable transport. Expansion should be on brownfield land and in urban areas.

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?

Light industrial use should be on previously developed land and not in rural areas. Heavy industrial (B2) and warehousing (B8) must be rail connected.

⁶ NPPF paragraph 3

⁷ NPPF paragraph 123

⁸ Contrary to paragraph 89 in NPPF

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

Definitely not. The essential characteristics of the Green Belt are its openness and **permanence** in the long term⁹. As described in the Logistics appendix, there is already an excessive amount of warehousing in the district and creating more cannot be exceptional. Employment should be centred in urban areas. It is environmentally wasteful and economically inefficient if development takes place in the Green Belt rather than in urban areas.

There is no requirement for a local authority to review or alter Green Belt boundaries even if this is the only way to meet need¹⁰. The revised NPPF also strengthens protections for agricultural land, by being clear that consideration should be given to the availability of agricultural land for food production and to the economic value of agricultural land¹¹. If there really is a justification for new employment land outside the urban area, it should be located beyond the Green Belt as specified in the NPPF¹².

Houses in Multiple Occupation

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?*

This does not appear to be addressing the causes of problems associated with HMOs. As described in the attached appendix on Logistics, the LP recognises that:

- Rugby's HMOs are related to the growth of logistics parks such as Rugby Gateway and DIRFT;
- Rugby has one of the highest proportion of jobs related to warehousing and support activities for transportation;
- Shift workers cause problems in HMOs.

When the number of low-paid shift workers is causing problems because they cannot afford better housing, the answer is NOT to attract more low-paid shift jobs. Creating more warehouses with more shift workers is counter to the need to reduce the HMO problem. The root cause of this problem needs to be addressed: too many jobs in the Rugby district are low skilled and low paid shift work. The LP acknowledges that it is necessary to attract the next generation of skilled businesses and jobs such as in R&D but the LP still seems fixated on creating more warehouses.

⁹ NPPF paragraph 142

¹⁰ Secretary of State Statement to Parliament on 19 December 2023 and NPPF paragraph 145 et seq

¹¹ For example, in footnote 62 and paragraph 180b) in the NPPF

¹² NPPF paragraphs 147 and 146c)

Climate Change

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

Solar energy should be supported on built development **throughout** the district. The policy should be that solar panels should be located on roofs and over other built forms (e.g. car parks) rather than on undeveloped land. Consistent with the demand¹³ in the NPPF to recognise the economic and other benefits of agricultural land, solar 'farms' should not be supported on agricultural land. The policy should require that all new roofs must have solar panels and the design of buildings must prioritise the optimisation of renewable energy.

Wind turbines should not be located within the Green Belt.

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?

In principle yes, but the nature of such infrastructure must be understood more before agreeing in practice.

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

Yes. This is necessary in order to meet net-carbon and biodiversity imperatives but it is not sufficient

- the policy should go further and not be confined to new built development. Rugby's carbon dioxide emissions per person are in the worst 10% in England and woodland cover in Rugby is in the worst 20% in England. Land is essential to increase tree cover and for biodiversity gain in general but the CfS is blind to this. The CfS continues to seek land for built development instead of encouraging land use for woodland - this approach sets the wrong tone for landowners. There must be a Call for Sites for nature recovery.

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 and, if so, where?

Allocated sites are essential to respond to the net-carbon and biodiversity imperatives. Land is necessary for biodiversity gain but the CfS is blind to this - the CfS continues to seek land for built development instead of encouraging land use for enhancement of biodiversity. The CfS currently sets the wrong tone for landowners - there must be a Call for Sites for nature recovery.

23. Would you support the creation of additional country parks as a way of delivering biodiversity net gain?

Yes. This is necessary and would have more benefits than increasing biodiversity. The NPPF confirms¹⁴ that access to a network of high quality open spaces is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.

This policy should not be confined to large country parks but should also create community orchards and woodlands - this is described in the attached Appendix B on the Environment: Carbon Net-Zero and Nature Recovery.

¹³ Paragraph 180b) in NPPF

¹⁴ NPPF paragraph 102

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

Biodiversity gain should be integrated into the design of development, delivered on site in all but exceptional circumstances. Off-site compensation is the last resort - if on-site biodiversity gain is really impossible, compensating biodiversity gain must be in close proximity.

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

Yes

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

Yes

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

Creation of community orchards and woodlands as described in the attached Appendix B on the Environment: Carbon Net-Zero and Nature Recovery.

Sites that were previously designated for other purposes but which proved to be undeliverable should be repurposed to increase tree cover and biodiversity. This is necessary because the NPPF requires¹⁵ a plan to be deliverable. As well as issuing a Call for Sites for the creation of new woodland and orchards, existing unsuccessful allocations should be reviewed and reallocated for this purpose. See Appendix B.

¹⁵ NPPF paragraph 16b.

Other Topics

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

The LP must include actions to improve water quality in rivers and other water bodies in the district. The SA shows that the River Avon catchment failed on chemical status in all of its water bodies and it has an objective (SA21) to improve water quality and comply with the Water Framework Directive. This issue is caused by multiple problems, ranging from agricultural run-off through pollution from industry to sewage discharges, and is not an issue that can just be left to other bodies (such as Severn Trent and WCC) to solve.

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

It is essential that the LP actively supports LTP4. This means more than just people movement, for example the need to take action to drive a mode shift of freight transport from road to rail (Policy Position F1 in LTP4). See Appendix A

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

Any sports stadium has to be fit for purpose so each has to be considered individually. Policies in the revised NPPF are sufficient.

Appendix A - Logistics

Logistics involves the storage and distribution of goods, combining transportation and warehouses. Warwickshire County Council is responsible for transport through its Local Transport Plan ('LTP'). Rugby is responsible for siting warehouses through its local plan. Issues with the logistics sector cut across climate change, employment, housing, land use and protection of the Green Belt as well as transport.

Warwickshire County Council recently adopted a new Local Transport Plan (LTP4). Its policies include Policy Position F1 to drive a mode shift of freight transport from road to rail. Rugby's plan fails to support the policy to shift freight from road to more sustainable transport even though it has excellent rail and canal infrastructure. Currently, rail-connected logistics terminals are situated in nearby districts at DIRFT, Hams Hall and Birch Coppice - Rugby has none. The proposed new sites are not situated on rail lines but are optimised for road transport so Rugby's proposals undermine LTP4. Rugby's new local plan must support the transition to the more sustainable transport of goods. This means it must restrain having yet more warehousing situated exclusively for road transport. The policy should be to only allow large new warehousing if it is genuinely for rail transportation.

The need for such a policy is illustrated in the LP (paragraph 2.20) which recognises the critical need to take action on climate change. It confirms (paragraphs 7.6- 7.7) that the transport sector is the largest emitter of greenhouse gases and that transport emissions have remained static while other sectors have improved. As other sectors are more effective in reducing their global warming impacts, the SA (Table 3) confirms that transport is **increasing** its share rapidly: an increase from 22% to 25% of the total by 2019. As the LP recognises (paragraph 7.6), Rugby's carbon dioxide emissions per person are in the worst 10% in England even before emissions from large industrial sites, motorways and railways are taken into account. A radical change is necessary.

While there are initiatives to reduce some emissions from the movement of people - such as electric cars, the encouragement of non-motorised transport and better passenger transport - more must be done to reduce the impact of the transport of goods. The commitment on Net Zero requires fundamental changes - it is vital that action is taken now to reduce the impact of logistics on global warming. It is incorrect to claim (LP paragraph 7.6) that emissions from large industrial sites and transport are outside of Rugby's influence as a local authority. The predominance of logistics facilities in Rugby district already generates considerable road transport movements, attracting heavy goods vehicles and increasing carbon emissions in the district. Unfortunately, the LP (paragraph 2.20) focuses on increasing warehouse capacity still further and identifies sites that are optimised for road transport. This will inevitably lead to further increases of road transport's carbon emissions, contrary to the imperative to drive to net-zero.

The LP (paragraph 3.17) recognises that Rugby already has the highest proportion in the country of business units used for transport and warehousing. Even though it recognises (LP paragraph 7.12) that sustainable land use is one of the most effective ways of responding to climate change, it goes on to propose (LP paragraph 3.5) the continuation of past trends in providing more land for warehouses. It identifies potential employment sites near the strategic road network (LP paragraphs 3.40-3.42) - such sites are clearly targeting warehousing and road transport. Even before Coventry and Warwickshire's "strategic warehousing need" is included, the LP devotes considerable effort in trying to justify more warehousing, leading to the allocation of vast tracts of land. It (LP paragraph 3.34) shows that Rugby is already over-supplying new land for employment in the current Plan. A change in approach is necessary.

The LP recognises (paragraph 3.42) that most of the identified strategic sites are within the Green Belt and so exceptional circumstances are required to justify inappropriate development. Rugby is already exceptional in an undesirable way: having more than its fair share of warehouses; it cannot claim that having even more warehouses is exceptional. In the past, Rugby has absorbed the claimed unmet need from neighbouring authorities (LP paragraph 3.30); the duty to cooperate does not mean a duty to agree and it is time to stop this pattern.

Stopping the development of even more warehouses for the transport of goods by road would help with the SA objectives of

- reducing greenhouse gas emissions (SA Issue 1),
- reducing traffic-borne air pollution (SA Issue 2),
- developing brownfield land in urban areas in order to reduce the pressure on green field sites (SA Issue 2),
- facilitating diversity of the economy (SA Issue 3) and
- ensuring a green recovery from Covid and Brexit (SA Issue 3).

The revised NPPF requires¹⁷ significant adverse impacts on sustainability objectives to be avoided.

SA Issues 2 and 3 also recognise the need to diversify the economy and enable the development of brownfield sites in the urban area. Building more out-of-town warehouses near main roads runs against these imperatives. Additionally, SA Issue 3 recognises the need to enhance local skills - that is not achieved by creating more warehouse operative jobs.

An associated issue is recognised in the LP (paragraph 6.4): Rugby's Houses in Multiple Occupation (HMOs) are related to the growth of logistics parks such as Rugby Gateway and DIRFT. It confirms (LP paragraph 3.19) that Rugby has one of the highest proportion of jobs related to warehousing and outlines (LP paragraph 6.13) the problem that shift workers cause in HMOs. Once again, creating more of the same runs counter to the need to reduce the HMO problem. The root cause of this problem needs to be addressed: too many jobs in Rugby are low skilled and low paid shift work. When the number of low-paid shift workers is causing problems because they cannot afford better housing, the answer is NOT to attract more low-paid shift jobs. Creating more warehouses with more shift workers is counter to the need to reduce the HMO problem. The root cause of this problem needs to be addressed: too many jobs in Rugby are low skilled and low paid shift work. The LP (paragraph 3.21) acknowledges that it is necessary to attract the next generation of skilled businesses and jobs such as in R&D but the LP still seems fixated on creating more warehouses.

If large new buildings for employment are really justified in Rugby district, it should also be the policy that any new or redeveloped large industrial or warehouse or retail building must have roof-mounted solar panels. The design of the building must prioritise the optimisation of renewable energy.

Finally, related to distribution, the CfS (Introductory section) continues to confine itself to land for housing and economic development. This 'business as usual' approach fails to recognise the need for fundamental change. The revised NPPF requires¹⁸ the LP to define land use in the area - this requirement is not confined just to built development but includes green spaces and ways to mitigate climate change. This issue is addressed further below.

¹⁷ Paragraph 32 in the NPPF

¹⁸ Paragraphs 17 & 20d in the NPPF

Appendix B - Environment: Carbon net-zero and nature recovery

As well as the imperative to drive to carbon net-zero, the LP (paragraph 2.20) identifies the imperative to make changes in order to meet the requirement of the Environment Act and its drive for biodiversity gain. If net-zero is to be achieved, this needs to be the dominant issue addressed in all sections of the plan. Biodiversity gain is an important part of the need for nature recovery.

The NPPF confirms¹⁹ that “*access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.*” It requires²⁰ policies to recognise the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

Rugby cannot just leave enhancements to the natural environment to Warwickshire County Council as implied by the LP (paragraph 2.6). It is possible for Rugby to progress these imperatives through proactive measures on the environment, investing in natural capital in the district. Green spaces are crucial for nature recovery, climate resilience and mental health.

As well as Rugby's carbon dioxide emissions per person being in the worst 10% in England, the LP acknowledges (paragraph 7.28) that woodland cover in Rugby is in the worst 20% in England. Land is essential to increase tree cover and for biodiversity gain in general. The LP identifies (paragraph 7.25) that one option to drive biodiversity net gain is to allocate sites for this purpose: this is **essential** but the CfS is blind to this. The CfS continues to seek land for built development instead of encouraging land use for enhancement of biodiversity. This business as usual approach sets the wrong tone for landowners. There must be a Call for Sites for nature recovery.

The LP identifies (paragraph 7.27) that some councils have proactive policies to increase tree canopy cover. Rugby needs to catch up with these councils even though the examples given only apply to major new developments. Rugby should go further, taking the lead on biodiversity gain and net-zero by taking more initiatives. Investment in natural capital could also benefit recreation, health and wellbeing of the population.

For example, Rugby should allocate land for Local Green Spaces such as community woodland and community orchards. A successful example of a community orchard is The Hens Orchard in Bradford-on-Avon.



¹⁹NPPF paragraph 102

²⁰ NPPF paragraph 180b)

This orchard was first planted in 2014 as part of an initiative in conjunction with the District Council at the time. It offers facilities for recreation as well as increasing tree cover. More locally, Baginton village also has a successful community orchard:

[Communtiy Orchard - Baginton \(baginton-village.org.uk\)](http://baginton-village.org.uk)

The NPPF requires²¹ a plan to be deliverable. As well as issuing a Call for Sites for the creation of woodland and orchards, existing unsuccessful allocations should be reviewed. Sites that were previously designated for other purposes but which proved to be undeliverable should be repurposed to increase tree cover and biodiversity. For example, the Little Orchard site in Stretton on Dunsmore was designated for housing and removed from the Green Belt in the current Local Plan (Policy DS3.8). But when the Little Orchard site was considered in more depth as part of a planning application for housing, it was refused because it was not practicable because of access issues.

As specified²² in the NPPF, the Little Orchard site in Stretton on Dunsmore should now be redesignated for a more deliverable use: as a site for Biodiversity Gain, returned to the Green Belt. Retaining this site as undeveloped land and creating a community orchard would be a positive initiative on biodiversity gain, tree cover and recreation. It would also show that lessons have been learnt when a designated site has been shown to be undeliverable.

Equally the Squires Rd site also has access challenges and should be returned to greenbelt.

²¹ NPPF paragraph 16b)

²² NPPF paragraphs 126 & 136

