

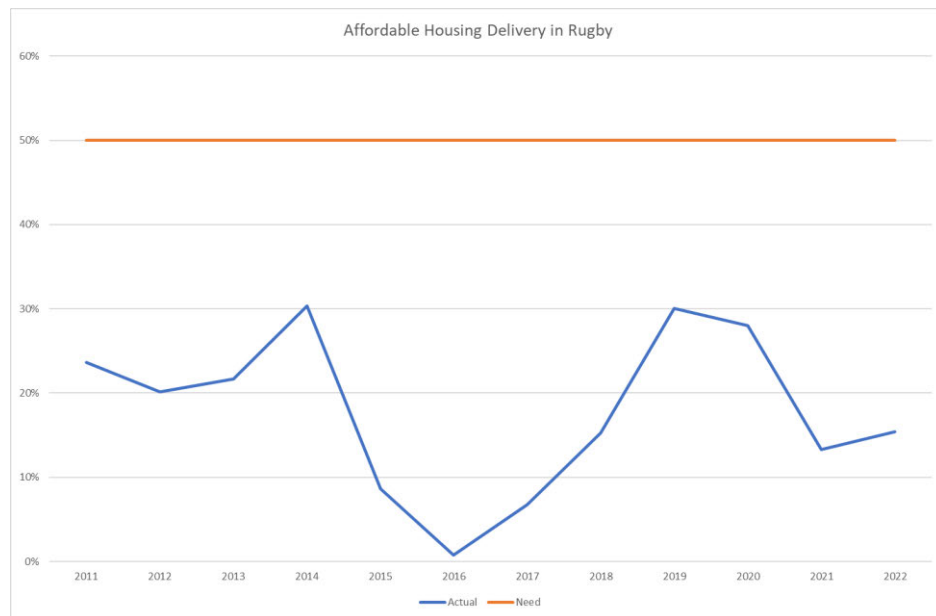
Proposed new local plan for Rugby – Issues and Options Consultation

Question	Response
1	<p>The HEDNA is almost as useful as a chocolate tea pot for helping work out how much additional employment land we need.</p> <p>There are two main problems with the HEDNA.</p> <p>The first is that the HEDNA does not address the land requirements of those areas of the economy it projects as having the largest growth in employment.</p> <p>Table 6.2 on page 134 gives the HEDNA’s estimates of changes in total employment over the period to 2043. The five largest increases in employment [according to HEDNA] are in order:</p> <ul style="list-style-type: none"> - Hospitality (18,400) - Public Services (17,000) - Real Estate and Professional Services (14,500) - ICT and Media (11,500) - Warehousing (8,800) <p>The HEDNA’s analysis is overwhelmingly biased in favour of the fifth largest source of additional employment.</p> <p>Nowhere does the HEDNA comment on the amount of land which would need to be taken up with hotels, pubs and takeaways to accommodate the 18,400 additional workers it foresees in hospitality– see my answer to Q2.</p> <p>Nowhere does the HEDNA comment on the amount of land which would need to be taken up with hospitals and schools to accommodate the 17,000 additional workers it foresees in public services – see my answer to Q2.</p> <p>The second major problem with the HEDNA analysis is that is mainly based on a “roll-forward” of past trends rather than an analysis of local needs. If we were to assume that the responsibility of RBC were to be to allocate sufficient land to find everyone born in our borough a job then a “broad brush” analysis shows that there is no need to provide any additional land for employment in our borough over the next twenty years. (We can take NOMIS data for the 2021 census and look at all the people aged between 5 and 19 years who might be expected to join the labour force – all 20,561 and compare that to the people aged between 50 and 64 who might be expected to leave the workforce – all 21,965 and we would conclude that the natural workforce of our borough will shrink over the period to 2041. Therefore all other things being equal there would be no need to provide additional land for employment.)</p> <p>So there is a large gap between the HEDNA’s continuation of “roll-forward” growth and the state of Rugby’s workforce. This gap is not explicitly addressed in the</p>

HEDNA’s flawed analysis but it is implicitly addressed. The HEDNA assumes that there will continue to be a high level of inward migration to the Rugby area.

The two main reasons for people moving to the Rugby area are first older people seeking a more rural location – see paragraph 4.20 of the HEDNA (A delightful lifestyle choice but not one which should compel RBC to also provide an employment opportunity] and secondly people moving to fill a job vacancy. If there were no job vacancies there would be no job related migration.

It might be a legitimate policy aim for RBC to wish to expand employment numbers within our borough [despite this not being needed to accommodate our current resident population] in order to provide a revenue base to in turn provide services for those of its citizens who are in a post-employment phase of their lives. However it needs to be very careful in this approach. Analysis of Rugby’s Authority Monitoring Reports reveals RBC’s lamentable failure to secure sufficient affordable housing for our borough.



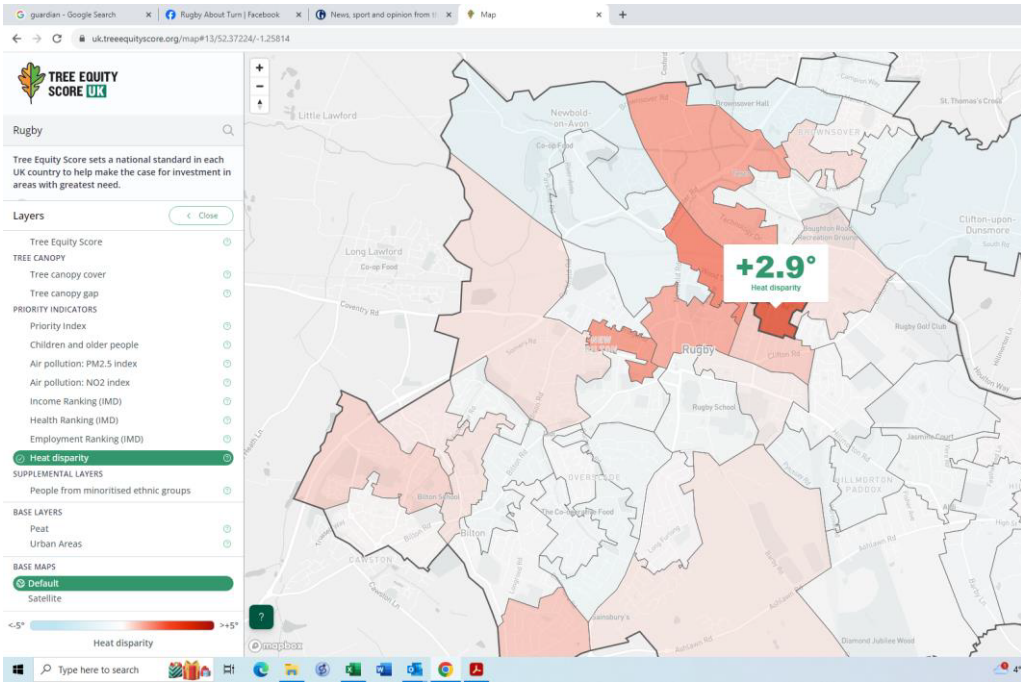
As a result of these years of failure the HEDNA now calculates no less than 55% of all new build in our borough should be “affordable” – table 8.14. If on the one hand RBC plans for an expansion in, for example, warehousing jobs and on the other fails to develop policies to secure over half of all new builds are affordable then the result will be the workers will migrate to our borough but without suitable accommodation and this in turn will lead to more pressure to convert existing dwellings into HMOs with the consequences we currently see in the planning committee – applications for HMOs opposed by local councillors but never-the-less being granted.

2 As demonstrated in my analysis above if any credence is to be attached to the HEDNA’s analysis we should be looking to allocate more land for C(1), E(b), E(e) and F1(a) uses.

Alternatively we could conclude that the HEDNA is hopelessly flawed.

3 This question is very badly structured.

	Clearly RBC first needs to consider whether planning application R23/1027 meets the special circumstances which justify building on the green belt. If it does then RBC will have allocated over half the large warehousing space the HEDNA says the entire city region needs. At which point enough will clearly be enough and all the other claims on our green spaces can and should be dismissed
4	The HEDNA states that the Coventry and Warwickshire area will have 11,200 fewer jobs in manufacturing by 2043 and that 67% of current warehouses will be obsolescent as warehouses by 2041. If the HEDNA is to be relied upon then this should throw up large amounts of space for those manufacturing businesses* which are taking on more labour to expand into. Setting large warehouse space to one side and considering the land which has already been allocated and which will become available through the factors listed above there seems no need to allocate additional land within RBC in the next iteration of our local plan. [*Which if the HEDNA estimates are accurate projections will clearly be a minority of all manufacturing businesses].
5	Bearing in mind the HEDNA evidence about large volumes of warehouse space becoming redundant over the period of the next plan the plan should have a positive policy which supports the conversion of brownfield former warehousing sites (B8) to B2.
6	Most of Chapter 13 of the National Planning Policy Framework sets out ways in which building on land which is currently part of The West Midlands's green belt could be justified. I am unaware of any additional "exceptional circumstances" which should be added to what is already a very extensive set of circumstances.
7	No response.
8	It is ridiculous that the Mill Road car park should be effectively a single story site next door to a transport hub. The Charolais Gardens development has achieved and the Myson House development should achieve one of Lord Roger's "pyramids of intensity" on the South side of the tracks and the aspiration should be to create one on the North side too.
9	Yes
10	No response
11	As part of a modal shift policy RBC should always be seeking contributions from housing developers to support bus and cycle routes from the new developments into our town centre.
12	Yes.
13	(b) and (c).
14	No comment.
15	No comment.
16	Yes.
17	Yes.
18	On-shore wind is the cheapest source of energy – see House of Commons library (2023). Any new local plan should show the areas where "wind farms" should be encouraged. We are losing too much agricultural land to solar. No agricultural area in Rugby should be zoned for solar energy production. The statement in the consultation document "... we could support or even require roof-mounted solar panels on certain types of building, for example large industrial and warehouse buildings" lacks ambition. All new build should be required to incorporate solar energy

	conversion across their entire roof area – with the possible exception of use class C3.
19	Ownership is irrelevant.
20	Yes.
21	<p>Yes.</p> <p>The tree equity map extract [below] incorporates satellite data to show which parts of Rugby are hotter than others and would therefore particularly benefit from the shading and evapotranspiration benefits of enhanced tree canopy cover. Fountains and other water features would also be beneficial and it is long past time that Rugby’s recreation facilities contained one or more splash areas for our children.</p> 
22	<p>The first priority should be to issue vertebrae to all members of the planning committee. There are far too many applications eg R18/0936 where the applicant falsely claims that a biodiversity net gain cannot be achieved on site and their lies are accepted by the planning committee.</p> <p>Where the county council does receive contributions eg for planning application RBC/16CC016 it is currently far too slow to apply them usefully.</p> <p>For the handful of applications where it is not possible to achieve a biodiversity net gain on site the local plan should identify a procedure for allocating sites for biodiversity net gain.</p> <p>I have more to say on this topic under question 36.</p>

23	Yes. [I argued that a country park should be created out of the open space requirement for the SW Rugby “Sustainable Urban Extension”. Very regrettably a majority of RBC’s councillors lacked the vision to incorporate this into the scheme].
24	<p>Very close regard should be paid to the Lawton Report. [REDACTED] failure to commission a timely successor to the <i>Habitat and Biodiversity Audit</i> (2017) and [REDACTED] failure to expedite Warwickshire’s Local Nature Recovery Strategy means that there is a severe danger of the emergence of competing land use strategies in the borough.</p> <p>Broadly speaking we need both “demonstration sites” – islands of wildlife close to population centres which in our borough’s case means Rugby so that local residents can get out enjoy and study “nature” without significant carbon emissions and loss of time and also we need to improve the connectivity between related ecologically significant habitats which in our borough’s case are probably most likely to be the Princethorpe Woodlands – but how can we know for certain what these habitats are before the work on the nature recovery strategy is completed?</p> <p>Where developers evade the responsibility of making their own projects a biodiversity net gain then the weregild they pay for planning permission should be directed either to the purchase of sites in and around Rugby for demonstration sites and/or for enhancing connectivity around the key habitats which emerge from the nature recovery strategy. [See also my answer to question 22].</p> <p>This needs to be unequivocally expressed in any new plan’s policies.</p> <p>The failure to address this issue is a key weakness of the Options consultation and I shall return to this matter in my answer to question 36.</p>
25	Not entirely. For the next local plan I would factor in a question of scale. Any development large enough to require an Environmental Impact Assessment should show how it could be “net zero”. The policy wording could state that smaller developments could win “brownie points” in the planning balance assessment by being net-zero.
26	Not entirely. For the next plan I would factor in a question of scale. Any development large enough to require an Environmental Impact Assessment should show how it could be “net zero”. The policy wording could state that smaller developments could win “brownie points” in the planning balance assessment by being net-zero.
27	Yes. For example helicopters are one of the least efficient forms of transport. A very demanding set of criteria should be put in place for the consideration of all new helipads other than those for the exclusive use of the emergency services/military bases.
28	Yes. All large new developments should have rain water harvesting systems and “grey water” systems for flushing toilets etc.
29	In 1729 Jonathan Swift put forward <i>A modest proposal ...</i> for the relief of poverty in Ireland. In the same spirit I have a modest proposal for an element of a design code for our borough. Let the design code decree that at the entrance(s) to each major development a plaque shall be placed in a prominent place recording the names of the councillors who voted for the proposal and the councillors who voted against. With the passage of time the citizens will be able to recall the names of the sage councillors in their daily benedictions whilst those who have acted against the

	<p>interests of our town (eg those who voted for R17/0971) will have their infamy recorded for posterity.</p> <p>I can think of nothing else which would first so readily improve the quality of the decisions the planning committee makes and hence improve our built environment.</p>
30	This should be implemented borough wide.
31	(a)
32	Yes
33	More than enough new sites have been identified to meet our borough's needs [using the PPG standard method] for new housing until at least 2041. We have a five year land supply. RBC should not be diverting energy (and distressing neighbourhoods) by searching for and promoting sites it does not need.
34	Yes
35	<p>Paragraph 9.28 is one of the most appalling and insensitive paragraphs ever to have been written by Rugby Borough Council. The HEDNA shows the scale of Rugby's failure to secure sufficient social housing for our borough. The suggestion that we should not even start to think about how we can respond to this until after the developers have told us how many social houses they can "afford" on their sites just illustrates the extent to which the needs of Rugby's residents are being ignored in favour of promoting the interests of developers. This whole thinking should be turned on its head. Developers should be told we need half of all new build to be "affordable" and that if they are too incompetent to work out how to deliver this they should not waste the planning staff's time by putting in planning applications.</p> <p>I have more to say on this topic under question 36.</p>
36	<p>Introduction</p> <p>It is now clear that the last local plan was a disaster. At its heart were inflated population projections for the local housing market area which ██████ stuck with even after the Council for the Preservation of Rural England very kindly pointed out the error of her ways. To this flawed population forecast was added a grossly inflated margin of over-delivery which left ██████ scrambling around to find large sites to plonk housing on – whilst ignoring in calculations of available land supply the cattle market site which RBC owned and was preparing to sell. First ██████ came down in favour of the Walsgrave site without considering the consequences. (Under interrogation by planning inspector ██████ at the Examination in Public the former Head of Growth and Investment was forced to admit that RBC had failed to properly consider the impact of such a proposal on the adjacent site of special scientific interest, grade 1 listed building and II* Historic Park and Garden). ██████ then turned to a proposal to develop land in Grandborough. This site was dismissed by the inspector as "... not a location where either the need to travel would be minimised or the use of sustainable transport modes can be maximised" additionally the inspector ruled that the site was not necessary as even "without Lodge Farm the remaining housing land supply would still exceed the Plan's housing requirement of 12,400 dwellings by more than 17%, which would be a comfortable surplus". With regard to ██████' proposal for Brinklow the inspector found that "Development in accordance with the [proposed] allocation would result a significant urban encroachment into the countryside. In turn this would cause significant harm to the openness and purposes of the Green Belt around Brinklow". Similarly with regard to ██████' proposal to trash the</p>

estate land in front of Coton House the inspector found “The development would be largely car dependent and not in a location where the need to travel would be minimised”. Overall the inspector required 186 main modifications to [REDACTED]’ proposals before he could regard them as compliant.

However even with the improvements [REDACTED] required there will still serious deficiencies in the plan. [REDACTED] had proposed that our affordable housing target should be slashed from 40% to 30% [20% for greenfield sites] and this aspect was not examined at the Examination in Public. The failure to deliver sufficient affordable houses now means that over half of all new houses built in the borough should be affordable. Naturally the failure to provide sufficient affordable accommodation has led to an increase in the number of Homes in Multiple Occupation and the local plan lacked the policies required to improve their operation and spread them more evenly across our borough.

A similar failure related to the need to provide C2 accommodation in the borough. In February 2020 the Head of Growth and Investment was forced to admit that she had no idea whether enough was being provided and the absence of this information was one of the factors leading to the loss of [half of] Oakfield Park in a ward which was already suffering from a deficit of green space.

Similarly the local plan failed to provide sufficient facilities for Gypsies and Travellers.

Whilst even as early as the winter of 2016/17 residents of our borough had flagged, through consultation on the Proposed Submission Plan, the desirability of requiring new buildings to have solar panels on their roofs this suggestion had been over-ruled by RBC.

All in all a woefully deficient process leading to a woefully deficient plan.

A new plan

On 25 October 2023 Rugby Borough Council approved an Issues and Options document for consultation as a step towards adopting a new Local Plan before 1 January 2027.

Information Deficiencies

However the approach the Council has adopted for this new plan is also deficient. The last local plan was formed on the back of a data deficiency as illustrated above by reference to Coombe Abbey and Oakfield Park. However three years before the last local plan was adopted the borough council did have several studies which are missing in this cycle. Examples of information available last time but where comparable more recent studies are not available now include:

- Warwickshire County Council’s Highways Authority transport options assessment (2015)
- The Rural Sustainability Study (2015)
- The Green Belt Review (2015)
- The Open Space, Play Pitch and Built Facility Study (2015)

- The landscape sensitivity study (2016)
- The Heritage Asset Review (2016)

Rather too late last time round RBC received [but did not read] a Water Cycle Study (2017) and a Habitat and Biodiversity Audit (2017). It is particularly concerning that RBC has rushed into a call for sites without first determining whether water supplies can be guaranteed for the existing population of Rugby and whether there is a further risk to the water quality of the Avon with lower summer rainfall [and higher temperatures] leading to lower river levels and potentially higher concentrations of pollutants whilst in the winter higher rainfall might lead to the discharge of untreated sewage. A recent planning application, R23/1027, has brought to RBC's attention the Meteorological Office's projections for the end of this century "UKCP18 data shows that future climatic conditions at the Site have the potential to be substantially warmer in both summer and winter, wetter in the winter than current day, but much drier in the summer. Key climate risks therefore relate to heavy winter rainfall, droughts and heatwaves in summer and extreme weather events (winds and storms)".

Thus whilst RBC has the HEDNA, a relatively up-to-date flood risk assessment and an assessment of the need for Gypsy and Traveller facilities much of the information it needs to put together a Local Plan is missing.

It is of particular concern that the "missing" information relates to such quality of life issues as traffic jams, recreational space and the quality of our countryside.

Timescale

The HEDNA dithered over whether the next local plan should reach out to 2041 or 2051. The consultation document states that Local Plans should* reach forward for 15 years but does not say whether Rugby Borough Council is interested in looking forward to 2041 or 2051. [*Which may have been true when written but has somewhat been overtaken by the last two versions of the NPPF which suggest looking forward for ten years would be more appropriate].

Surprisingly whilst the consultation document has specific questions about quantity (Q1 and Q31) it does not ask the obvious question about timescale.

I do **not** support the Council looking to make additional land allocations for the period 2041 to 2051 to meet possible needs that may arise during that period. A plan agreed in December 2026 covering the period to December 2041 would still have ten years to run when renewed in December 2031 and critically would have significantly more than a five year housing supply allocation.

It is of course difficult for officers to keep up with HMG's ever shifting planning guidance, three versions of the NPPF this year alone. However the latest version of the framework only asks local authorities to prepare plans looking ten years forward ie to December 2036 and for fifteen years where possible (ie to December 2041).

Looking ahead to 2051 goes way beyond the current [20 December 2023] version of the NPPF.

The law and morality

Except in extreme cases [which I do not currently envisage] the moral choice is to obey the law.

Rugby Borough Council's approach to preparing the new local plan appears wholly legalistic.

Morality does not *solely* consist of obeying the law. Rugby Borough Council should also embrace a moral duty to consider the welfare of its citizens and the law should be viewed through this lens.

Maslow's hierarchy of needs may provide a useful tool for considering the welfare of our borough's citizens.

Physiological needs – water, food, shelter, energy

As noted above the borough council does not have a current water cycle study. Before allocating more land for anything it should check that its residents needs for water can be met.

The SW Rugby "sustainable urban extension" which was allocated in the 2019 Local Plan has led and will continue to lead to a loss of the "best and most versatile agricultural land" in our borough. To enhance food security for our residents much greater priority should be given to the retention of such land. This priority should take two forms – firstly in removing the "best and most versatile agricultural land" from the sites under consideration for allocation and secondly having a clear policy within the plan indicating that in any consideration of a proposed development a high weighting will be attached to conserving the borough's supply of the "best and most versatile agricultural land".

With regard to shelter fortunately the HEDNA confirms that the amount of land allocated in 2019 provides sufficient plots to meet the needs of Rugby's residents up to 2041 including the needs of those residents who have yet to be born here.

With regards to energy please see my response to Q18 – suitable land should be allocated for wind power – the footprint of wind turbines and associated transformers etc is unlikely to have a major impact on the agricultural capacity of the land chosen. With the possible exception of buildings in class C3 the installation of solar panels should be a requirement for all new building projects. [Interestingly I note that this issue was raised in the response to the Publication Draft of the last local plan in the winter of 2016/2017 but Rugby Borough Council turned a "deaf ear" to the views of its citizens on this matter.]

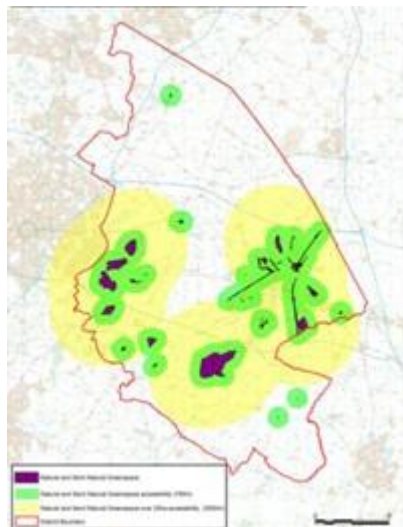
Safety and Security – health, employment, property

The only additional land set aside for health provision in the 2019 local plan was for a 7GP clinic in the SW Rugby "sustainable urban extension". Work on this was to have commenced no later than 31 March 2021. It has not. In addition £2M was sought in developer's contributions for improvements to St Cross and Walsgrave hospitals. The HEDNA predicts that Rugby's population will both grow and age and

yet oddly does not predict a need for additional land to meet the health care needs of our citizens.

Another critical aspect of health is raised by the Chief Medical Officer's report for 2023 which refers to the responsibility of individuals to look after their own health through such measures as exercise and diet. Land use planning is important here. The 2019 Local Plan set standards for open space but in practice they are not enforced. For example even without accounting for the land required to ensure no loss of biodiversity the extra population introduced by planning application R19/0804 would have required over a hectare of land to have been purchased for the residents of Benn Ward. No land was purchased. Influenced by the reasons discussed above the determination of R19/1164 increased the open space deficiency in Benn Ward and RBC did not object to the county council's proposal RBC/16CC016 to increase the open space deficit in Rokeby & Overlade ward. Whilst RBC correctly refused planning permission for R13/2102 it failed to list not meeting space standards as one of the reasons for refusal and then sat silently through the appeal.

As noted above four years before the last Local Plan was agreed RBC had a report on the extent to which it was making reasonable provision for recreational space. This time it has launched an Options consultation without the sort of information shown on page 44 of the Nortoft Report.



The analysis needs to be reviewed. It is no longer considered accessible if a drive is involved but conversely a walk of up to a kilometre [rather than 700 metres] is now agreed to be reasonable. Additionally regard should be had to the minimum length of a walk or area of ground required to make a "destination". Some of the smallest sites included in the Nortoft report should be excluded as "destinations".

RBC has consistently failed to consider how our local footpath provision should be enhanced. For example the 2019 Local Plan omitted the possibility of requiring a link between Northampton Lane and the Cawston Greenway as part of policy DS8. Careful consideration could and should identify other opportunities – for example a link between the Hospital of St Cross and Great Central Way. The provision of

attractive circular walks would be a good in itself and might encourage more people to adopt the sort of lifestyle of which England's Chief Medical Officer approves.

Unlike the amount of land required to meet our water, food, energy or health needs the HEDNA does make a prediction about the amount of land required to secure our employment needs. I have challenged the basis of these predictions in my response to the first question of this consultation document.

Pages 155 to 197 are some of the most depressing of the HEDNA. First they show how wrong Cllr Timms was to propose in the 2019 Local Plan that the proportion of affordable dwellings to be included in Rugby's new developments should fall from 40% to 30%. The annual monitoring reports show how Rugby has failed to meet even this modest proportion. Some two in five of newly forming households are now predicted not even to be able to rent a roof over the heads and the need for affordable houses has grown to the point where 55% of all new houses built should be affordable. The Options Paper does not address this pressing need but rather puts it on the long finger "We will decide the percentage of affordable housing that we can realistically seek on housing development sites when we have viability evidence".

Love & Belonging – friendship, intimacy, family, sense of belonging

Not even the most optimistic of us can believe that sound land use planning will bring love but through place making it may help foster a sense of belonging.

Before it was swept away by the 2019 Local Plan old saved policy LR1 required new developments to have regard to civic space. Now we have significant developments such as the 840 houses being built on Ashlawn Fields with no place for the public to meet – no shop, no church/mosque/gurdwara, no pub, no parish hall. Rugby's planners are designing-in alienation and anomie.

Something along the lines of the old LR1 policy should be incorporated into any new local plan.

It is clear that sufficient land has already been provided for new housing in the borough to meet all our needs up to 2041. However in the alternative, should madness prevail, and the Council decide to allocate new sustainable urban extensions in such sites as "South of Hinckley"; "East of Coventry"; "South of Hilmorton"; and "M6 junction 1" then great attention should be paid to boundaries and centres – unlike what we currently see in the SW Rugby "sustainable urban extension".

Esteem and Self-Actualisation

It is best to assume that the two uppermost layers in Maslow's hierarchy are not amenable to land use planning.

Other Living Beings

Beyond humanity it is arguable that there are other living beings to whom responsibility is owed.

HMG policy is that 30% of the land area of our country should be protected for nature. HMG calculated that this would require an additional 4,000 sq km of land to be designated. On a population basis Rugby's share of this would be some 6 sq km – say for example the northern slopes of the Rainsbrook Valley between Dunchurch and Hillmorton. [It should be noted that many conservation bodies believe that far more additional space would need to be designated than the 4,000 square km suggested by HMG in order to arrive at 30% of our land being protected. If HMG have performed any allocations which show that our population could be satisfactorily fed, sheltered and so forth in the 70% of the land area left over after 30% was allocated to nature they have not brought those calculations to my attention]. However 6 sq km would be a handy aspiration to put into any new local plan.

The amount of land in our borough designated for nature “natural and semi-natural” should be growing. There are two broad classes of such land. That which is required for conservation and the Princethorpe Biodiversity Area is the prime example in our borough and that which is required for residents to get out and enjoy nature. (The latter needs to be closer to population centres – no one in an urban environment should live more than a kilometre away from a decent plot of natural or semi natural green space). RBC has kick started the process for a new plan without undertaking the necessary research. Its habitat and biodiversity audit is six years out of date.

On the face of it the key policies from the 2019 plan HS4, NE1, NE2, NE3 and SDC2 should have been strong enough to deliver what is required and yet we can see they have not. Is it merely that we need better councillors on the planning committee and as the Portfolio Holder for Growth and Investment or do the apparently sound policies of the 2019 plan need strengthening to secure the required results?

How is it that despite the green and blue infrastructure policies in the 2019 plan an options document for a new local plan can promote eight areas for commercial development of which no less than 2 are in the Princethorpe Biodiversity Area, 1 is in the Princethorpe Biodiversity Opportunity Area, 1 is in the Strategic Green Infrastructure Area and 1 is in the Potential Green Infrastructure Corridor Area? How is it that despite the green and blue infrastructure policies an options document for a new local plan can promote thirteen areas for new housing development of which no less than 4 are in the Princethorpe Biodiversity Area, 3 are in the Strategic Green Infrastructure Area and 2 are in the Potential Green Infrastructure Corridor Area?

How is it that despite what appears to be a very clear requirement that “New planting comprises native species which are of ecological value appropriate to the area” that Homes England should aspire to dot our Dunsmore Plateau Landscape with *Viburnum lantana*, *Sorbus acuparia* and *Quercus petraea*? Why without having alternative economic appraisals in front of them and despite the assurances given to the planning inspector did the planning committee allow Barratts to get away with

	<p>the idea that including English oak in their planting scheme for Ashlawn Fields would render the development uneconomic? Would it be better if instead of saying “New planting comprises native species which are of ecological value appropriate to the area” we made it clearer for developers by stating exactly which species should be used in which contexts? Clearly the current approach is not working.</p> <p>Why has the Portfolio Holder for Growth and Investment allowed a report on R23/0491 to come forward to the January 2024 meeting of the planning committee which with a projected increase in Rugby’s population of 60 people should have allowed for at least 0.15 hectares of natural and semi-natural green space to be provided to come forward with no plan to increase such designated space? [I am not suggesting that Cllr Picker should cross-check all the reports written for the planning committee but he should have provided general guidance to avoid this bad practice. Perhaps he has provided such guidance but it is not being followed].</p>
37	<p>The Rugby Local Plan already has policies which support sustainable travel viz DS5, HS1, HS5 and D1.</p> <p>It seems to me that the problem is not the absence of policies which support sustainable travel but rather the failure of the planning committee to enforce them. For example why did the planning committee approve R18/0936 when the applicant failed to demonstrate the cycling link to the secondary school site identified in the SW Rugby “sustainable urban extension” which should have been provided under DS5?</p>
38	<p>Yes – Butlin Road.</p>

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