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29th February 2024

Issues and Options Consultation
Development Strategy
localplan@rugby.gov.uk

Dear Sirs

Local Plan Review Consultation: Response from Pailton Parish Council

Please find attached our comments on the consultation points you have raised.

One general, but consistent point in our response, is the very long timescale Rugby is proposing for making detailed forecasts and relevant land allocations. The statutory requirement is for a Local Plan to be a minimum of 15 years. Continuing with a 20 year horizon for the new Local Plan would be much more sensible, particularly as there remains the need to review Local Plans every five years.

The current Local Plan covered the period 2011 – 2031 but in this timescale the world, particularly technology, has changed out of all recognition. Take iPads for example, these were not launched until 2010 and yet consider the impact they (and other tech innovations) have had on most aspects of life today. The other significant challenge is climate change, where perceptions from 2011 and the growing reality of achieving net zero by 2050 , will inevitably mean that plans made on a sound basis today are likely to be obsolete long before 2050 – however RBC could be committing our Borough and the wider HEDNA partners to plans that either stifle growth or blight areas ‘by land use designations’- areas that might otherwise have more creative futures.

We have commented on the eight major issues and how to embed climate and nature policies, throughout the plan. We particular support improving the quality of housing development with a new design code and have put forward four other points for consideration.

Your sincerely

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Land for Employment uses

This has been developed in conjunction with Coventry and Warwickshire Housing and Economic Needs Assessment (HEDNA) –

The Issues	The options or questions raised in the consultation	Pailton Parish Council Response
Strategic warehouses of over 9000m ²	<p>Questions 1 -5</p> <p>551 hectares to 2041</p> <p>Increased to 735 hectares 2050</p>	<p>1 and 2</p> <p>We have noted RBC's reported progress with much of the land require to 2031 – either built or under construction – and indeed your Issues & Options reports that no extra land is needed until 2041 - and only 40.29 hectares by 2051.</p> <p>You will note that we do not consider it appropriate to make land allocation so far ahead.</p>
New office land (Rugby only)	<p>5.2 ha (or 4.2 with hybrid working) by 2041</p> <p>Increased to 6.5ha by 2051</p>	<p>We understand the need for cross authority planning and working in this area but think RBC needs to be more ambitious than simply settling for warehouse operatives in big sheds.</p>
Industrial land (Rugby only) – including smaller warehouses below 9000m ²	<p>150.5 ha by 2041</p> <p>Increased to 218.2ha</p>	<p>RBC needs to continue the strands of work that has them considering employers' needs and long term options or questions asked in the plan for growth potential in a high tech environment – e.g. the former Rolls Royce site area and the advance tech plans that are being processed from Warwickshire University etc</p> <p>If your estimate of hybrid working is correct ... then you may be allocating 50% more land than required when thinking of 2051</p> <p>We note that this may not be all new allocation but is likely to met by redeveloping existing sites.</p> <p>We would question why more sites need to be allocated now?</p>
Strategic location of large employment sites	<p>Map provided showing options for the provision /distribution of</p>	<p>3. Our primary issue with the sites is related to the area around J1 on the M6 – and although not shown the corresponding area that covers Magna Park. We would support expansion of</p>



	large employment sites	<p>the Europark and land close the Gibbet Hill Roundabout, which is already subject to improvement via the National Highways team.</p> <p>If there were to be any further expansion in these areas then there must be protection of the routes that pass through the Fosse Villages – with appropriate signage that these routes are not suitable for HGVs. It would also be appropriate to protect the Fosse villages through lease conditions – as would compulsory use an overlay on their satnavs that block the village roads being shown. Weight restrictions on narrow constrained village road would also be essential.</p>
	How to provide land for existing businesses to expand	4. We do not think allocating new sites – possibly in different locations would necessarily meet the needs of business who wish to expand. The most efficient option surely is to increase the size of some existing sites ... or facilitate work of commercial developers to replan sites – perhaps with the relocation of businesses that don't need to expand.
	Should RBC differentiate in the allocation of sites for industrial and light industrial	5. No. This seems to constrain the work of developers and limit options for expansion etc
Greenbelt boundaries - Most of the locations shown on the map are 'Greenbelt'	Do we support alterations to the Greenbelt.	6. Generally we do not support changes to the Greenbelt - but our view might change in truly exception circumstances If for example were strong environmental protections that mitigate any impact. For example, cladding that in nature and colour 'softens' the impact and use of photovoltaic panels on roof. In addition ,rain water (with grey and brown water) harvesting must ensure reuse of water and no impact on existing flood plains or adjoining fields.



Town Centre Regeneration

The Issues	The options or questions raised in the consultation	Response
Necessary to maximise on the opportunities arising from Class E (commercial, business and service) designation of town centres	Do you agree with the proposal to remove primary and secondary frontage designations – and introduce site allocation.	7. Yes in principle ... but here strong, effective and creative design codes will be necessary to ensure town centre area remain attractive – but so many areas are not inviting that in fact perhaps become is more relevant ambition.
	Do you agree with the sites covered by the site allocation	8. Yes – these all seem sensible but consistency and stringent designations must be maintained. The quality of open spaces and the creation of ‘destinations for events’ must feature in the planning use of Rugby town centre.
Local Centres		
Treatment of smaller local centres to become defined ‘local centres’.	Policies for areas for site allocation. If these were defined as local centres the RBC could monitor changes over time ... but it would not have the power to stop them becoming residential sites.	9. Not necessarily – we think a clear statement of intentions and ambitions but leave flexibility to meet local residents and commercial opportunities i.e. do not constrain future possibilities. The other essential element of this would be recognition of, and protection for, assets of community value. 10. Yes we would support this ... but have some concerns that an unintended consequence of spreading changes to frontages etc could weaken RBC’s ambitions for Rugby Town Centre. Smaller local centres to many borough residents and villages would be more attractive destinations than the larger Rugby Town Centre.
	What else could RBC do to support town centre regeneration.	11. Essential is planning for adequate, accessible and reasonable parking should be a priority.



Pitches for Gypsies and Travellers

The Issues	The options or questions raised in the consultation	Response
Provision of Gypsy and Travellers pitches	There are two definitions of gypsy and traveller sites – one based on ethnicity and a PPTS government definition which the High Court has found to be discriminatory -but it remains government policy.	12. Yes We support RBC use of ethnicity as the definition of gypsy and traveller sites – albeit this produces the requirement for significantly higher number of pitches – 79 in the period to 2037.
	How to find Gypsy and Traveller pitches?	<p>Our views on this:</p> <p>13. You have already undertaken research to address this specific question – why repeat the question</p> <p>a. Allocate sites for Gypsy and Traveller pitches as part of new employment land or housing sites – would seem reasonable but the ease of access to education, and medical support etc must be taken into account. These pitches should not be outcasts from the services that the rest of the community can access. Landscaping of all and any such sites must be addressed to ensure that sites do not become eyesores – and environmental factors on water harvesting and heating must be to the highest standards.</p> <p>b. We do NOT think RBC should regularise unauthorised sites – unless these are for a defined period to enable education of children. But if this were the case then Enforcement officers must be encouraged/empowered to monitor and act when temporary ‘needs’ expire – these sites should not become permanent by default.</p>



		<p>c. We have concerns that creating a new borough or council owned site could create types of ghettos or similar community outcasts such the restricted zones for refugees ... and there seems evidence that gypsy and traveller communities do like these sites.</p> <p>d. In response to the question on 'size of sites.' – we again would refer to the research/consultation work recently undertaken. As before it is imperative that gypsy and traveller views are heard and in fact evidenced that they have been consulted.</p>
	What size of site should we seek to allocated	14. Your own research suggests between 6 and 10 is the preferred optimum size
	<p>Should we adopt a negotiated stopping (transit) policy ...</p> <p>And if so where?</p>	<p>15. Yes, but only if there is agreement with local communities and relevant authorities to ensure that this is effective and proactively monitored.</p> <p>Also essential would be proactively supporting these 'transit' sites with enhanced council support including refuse & recycling and facilitating access to other support services.</p> <p>As to the location of these 'stopping' pitches this must be determined and negotiated with gypsy and traveller communities and local community groups and authorities.</p>



Houses in Multiple Occupation (HMOs)

The Issues	The options or questions raised in the consultation	Response
<p>HMOs are Houses with three or more unrelated individuals who share basic amenities such as kitchen or bathrooms. Nationally and locally this of concern as it can put pressure on parking, spoil the visual amenity of other residents, reduce community cohesion, generate disputes over rubbish bins etc , increasing local rents and causes noise and disturbance.</p> <p>HMOs with more than five residents have to be registered and licensed. There are currently 199 licensed HMOs in Rugby itself. Rugby's employment opportunities that attract single males</p>	<p>RBC needs an effective policy to deal with this – particularly bearing in mind that Rugby has a greater than average concentration of HMOs.</p> <p>The map provided illustrates the concentration of these properties in Rugby.</p> <p>Suggestions include limiting concentrations of HMOs within a 100m radius to 10% of dwellings, avoid non HMOs being 'sandwiched' between two HMOs and no more than three consecutive HMOs on a street.</p>	<p>16. We are in general agreement with policy options detailed in the plan as the current impact is very visible in areas of Rugby – particularly around Rugby Station and the off the A426 .</p> <p>But we have some concern on how this might be addressed – for example on the narrow roads that lead to and from the station and off Clifton Street. Is the Council proposing compulsory purchase of these properties? Or just putting restrictions on them that as far as the property owner is concerns would blight their investment.</p> <p>Will all changes be retrospective.</p> <p>17. We don't believe these concerns should stop sound options being considered, but an effective and consistent implementation of the policy must be properly resourced.</p> <p>e. The identified need in the evidence papers for adequate social housing should also be positively addressed.</p> <p>f. Consultees are asked to suggest locations for the distribution of the new options or questions – but the solution can already be seen on the map – the answer may simply be to spread out the concentration in the existing areas – with perhaps one or two where demand has been recognised.</p>

CLIMATE CHANGE POLICIES

The Issues	The options or questions raised in the consultation	Response
<p>RBC adopted a motion to declare a climate emergency and the local plan needs to reflect how planning can contribute to net zero by 2050.</p> <p>Local Plans need to mitigate climate change and adapt to its effects</p> <p>Out of 376 local authorities, Rugby currently is 269th so has far to go – wind farms for example are blocked in the current local plan</p> <p>Evidence from Bath and Cornwall show that net zero add to build costs.</p> <p>RBC is a water stressed area and there are already restrictions on water usage in new build houses</p>	<p>The most effective measures to reduce greenhouse gases are:</p> <ul style="list-style-type: none"> - Diversifying energy supply through wind and solar - Sustainable land use and urban planning - Green infrastructure - Ecosystem services <p>Net zero add to build costs – and the impact of which would pass on to buyers</p> <p>RBC would need a specialist officer to assess energy statements</p>	<p>18 Yes , we do think you should show areas of the borough in which wind/and or solar will be supported. With solar always being the preferred solution.</p> <p>As to their location, wind farms would be more acceptable were these to be in areas of employment land, while solar panels could and should be introduced roofs of all buildings.</p> <p>19 Community ownership (o shared benefits) would increase our support for this type of development</p> <p>20 We would like to see more evidence on the impact of battery energy storage and hydrogen infrastructure before we give a definitive response ... but certainly think the RBC should be planning for this and providing evidence</p> <p>21 The adoption of a minimum tree canopy policy is essential and very overdue – but minimum distance from roads and building infrastructure will be essential.</p> <p>22 The adoption of priority locations for biodiversity net gains ‘off site’ to compensate for areas that cannot meet the requirements ... but as ever the devil is in the details.</p> <p>23</p> <p>So while our response would be a theoretical yes – there should be evidence of sites that can and cannot provide biodiversity net gains.</p>

		<p>Yes, we would support the creation of additional country parks as part of delivering biodiversity net gains.</p> <p>23 Yes, developer should prioritise the delivery of biodiversity net gains within close proximity to their sites. But care needs to be taken that this does not become a route for developers to avoid putting-in such schemes on site where think this might depress their profits.</p> <p>24 We agree that net zero is fast approaching but perhaps there should be a short transition to this before all residential developments have to be net zero – rather than an immediate impact.</p> <p>But for employment sites this could be an immediate change.</p> <p>We think non residential development should meet higher water efficiency standards – brown water recycling, harvesting of surface water are essential and easy options to reduce water usage.</p>
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DESIGN CODING AND GUIDANCE

The Issues	The options or questions raised in the consultation	Response
<p>Government now places greater emphasis on design ... therefore RBS needs a policy that reflects national priorities and reflects local character and design preferences.</p> <p>In terms of current guidance there seem to be two Coton Park and South West Rugby</p> <p>In addition, neighbourhood plans include design policies [as does Village Design Statements]</p>	<p>Should RBC produce design codes as part of its new Local Plan</p> <p>Which areas should be covered</p> <ul style="list-style-type: none"> - Borough wide - Borough wide but divided into character areas e.g. Rugby town centre the Victorian terraces etc - Only for some neighbourhoods - Only for large new developments 	<p>29. Yes RBC has to produce design codes as part of its new plan</p> <p>30. It would make sense to have these throughout the borough but divided into character areas and or village/rural specific locations.</p> <p>Large new developments are an obvious route to securing a jump start to this policy – as are the detail and work that has gone into Neighbourhood Plans and Village Design Statements. These should consistently be given priority weighting by planning officers, when making decisions.</p> <p>However, the retention of open spaces is essential, as is protection of ‘visuals gaps’ to maintain views of geographic and built features.</p>



LAND FOR HOUSEBUILDING

The Issues	The options or questions raised in the consultation	Response
<p>The existing plan provides housing land until 2030 – now need to look for the longer term</p>	<p>One of the key issues here has to be the methodology for calculating housing need. The HEDNA method of calculating the number of housing needs has proved to be so wrong and overestimated the number of houses needed for Coventry.</p> <p>Timescale is also critical – too long could blight areas</p> <p>Timescale is particularly relevant as the government (and opposition) have announced intentions to change much of the planning legislation ...</p>	<p>Absolutely agree that RBC and developers need a longer time frame for planning new developments etc ... but 2051 is too far ahead.</p> <p>Your own table [9.23] shows a big difference between the methods of calculation of housing need and the changes in the figures produced if the time scale of 2041 and 2051</p> <p>31. We therefore think you should be planning for Minimum local housing needs</p> <p>32. We would support RBC improving existing social housing and developing new affordable homes</p> <p>33. Looking at the map on page 52 – most of the locations seem ‘sensible’.</p> <p>34. Yes all new dwellings should meet the additional Building Regs for accessible and adaptable dwellings and for at least 10% of new dwelling to be suitable for wheelchair users.</p> <p>35. The shortage of small apartments identified in the issues paper should be addressed with encouraging developers (large and small) to provide such accommodation.</p>



OTHER TOPICS

The Issues	The options or questions raised in the consultation	Response
<p>This consultation focuses on the 7 big issues .</p>	<p>This section is to raise other planning issues that should be considered</p>	<p>36. We think a new ambitious initiative to change and improve the main road entrance to Rugby from the A426 (Newbold Road) into the centre to town is critical to perceptions of Rugby. At present this route is dismal and depressing. This would mean demolition and rebuild but the impact would be tremendous.</p> <p>37. We support the intention to bolster your policies on sustainable travel but only on routes where there is evidence of demand. We have seen examples in an adjoining local authority, where trees and landscaping have been removed ... but then in practice the buses and cycles are not used.</p> <p>38. Yes, we support the protection of stadiums as community and sports facilities. The Binley Wood/Brandon motor sport stadium is an excellent example of this.</p> <p>40. Rugby must continue to improve liaison support for parish councils in respect of planning ... and provide grant support for community projects.</p> <p>41. Rugby must support parish councils in identifying and safeguarding assets of community value – not just for today but for future generations.</p>

