

CONSULTATION RESPONSE

1. This document is submitted in response to the request for responses to the publication by Rugby Borough Council of the Local Plan review issues and options consultation.
2. While most of the key issues are covered in the suggested consultation questions, the key issue about whether the Local Plan should extend to 2041 or 2050 is not addressed. It is clear that much of the proposed plan is based on historical analysis of data from 2010 to 2020 and projections from then. Throughout this period, the UK was a member of the EU and enjoyed open borders to citizens of the EU. The Borough of Rugby welcomed a significant number of citizens from the EU. Government policy was/is that this should not prevail after BREXIT (31 January 2020). Projections on housing and employment will, therefore, inevitably be difficult and the longer the planning period, the greater the difficulty. In addition, if the longer planning horizon is selected, developers will inevitably prioritise those sites which offer them the most easily gained and secure financial returns – not necessarily in the order which benefits the citizens of the Borough. For these reasons, it is believed that the Local Plan should be confined to the period to 2041.
3. Consultation Question 16. It is not believed that restricting the concentration of HMOs is in the best interests of the Borough. Houses, suitable for conversion to HMOs in Rugby, tend to be of a type (Victorian terraced houses) which are concentrated in particular parts of the town. Restricting the density of HMOs would significantly affect the availability of this type of accommodation in the future.
4. Consultation Question 17. The proposal to introduce a criteria-based policy for HMOs is sensible. However, it is suggested that this policy is confined to new HMOs and that there should be no criteria for external space. Criteria for parking, refuse storage and the adequacy of internal space should be introduced.
5. Consultation Question 18/26. The inclusion of Solar Panels on all industrial buildings should be a planning condition.
6. Consultation Question 31. It is clear that, by the time the new Local Plan is finalised, the Government will have revised the standard method for local housing need. In the absence of a definitive method for calculating the housing need, the HEDNA method seems sensible and it is abundantly clear that the latest affordability data

and a 2023 base date should be applied. This gives a housing requirement of 672 houses per year.

7. Consultation Question 32. RBC should be strongly supported in improving existing and developing new and affordable housing. There is a strong demand in the borough for rented and affordable housing. Developers frequently claim that it is not viable to include affordable housing in their development and, if they cannot provide the requirement, RBC becomes a key provider.
8. Consultation Question 33. The most important criterion for the allocation of sites for new housing should be the sustainability of the site. The key aspect to sustainability is transport. Availability of public transport in village locations is, at best, sporadic. As well as the direct unsustainability of these locations because of transport, they also cannot provide the affordable housing requirement because many of those requiring affordable housing cannot afford cars. It is vital that adequate investment in infrastructure (roads, schools, GP practices, police etc.) should be made either prior to or at the same time as any housing development.
9. Consultation Question 33. It is clear that, if it had not been classified as Green Belt, the area south-east of the A46 would be the most suitable location in the borough for additional employment land and housing development. It would appear that this classification benefits the City of Coventry but not the borough of Rugby. From every aspect of sustainability (transport, landscape, agriculture, etc), this area is preferable to the southern part of the borough. This classification therefore benefits the City of Coventry at the expense of the Borough of Rugby. If this classification is not reviewed/changed in the short/medium term, then in the long term (2040/2060) significant employment land and housing development in the borough will be confined to the southern half of the borough and the towns of Rugby and Daventry will eventually coalesce.