



RUGBY BOROUGH LOCAL PLAN

ISSUES AND OPTIONS:

CONSULTATION REPORT

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BACKGROUND

The Regulation 18 “issues and options” consultation ran from Monday 30 October 2023 to Friday 2 February 2024.

A notice was placed in the Rugby Observer on Friday 3rd November 2023. See [Appendix 1](#).

Notice of the consultation was sent by email and post to those on the council’s planning policy consultation database. This includes all neighbouring authorities, parish councils, borough councillors, duty to cooperate partners and statutory consultees.

The consultation was undertaken in line with the consultation strategy approved by the council’s cabinet at its meeting on 23 October 2023 and by council at its meeting on 25 October 2023. A copy of the consultation strategy is at [Appendix 2](#). The consultation strategy was prepared in accordance with the Statement of Community Involvement.

Online consultation events were held on:

- 8 November 2023 7-8pm
- 17 January 2024 7-8pm

A briefing for elected members was held on Thursday 23 November and a briefing for parish councils was held on 30 November 2023.

The following in person ‘drop in’ consultation events were held:

- Tuesday 14 November 2023 5-6pm Cawston Community Hall
- Tuesday 21 November 2023 4-6pm Dunchurch Village Hall
- Tuesday 28 November 2023 4-6pm Rugby Art Gallery & Museum
- Monday 4 December 2023 4-6pm Brandon & Wolston Village Hall
- Wednesday 6 December 2023 3.30-5.30pm Wolvey Village Hall
- Thursday 11 January 2024 11.30am-1.30pm Tesco, Leicester Road
- Thursday 18 January 2024 10am-12pm Asda, town centre
- Tuesday 23 January 11am-1pm Sainsbury, Dunchurch Road
- Tuesday 23 January 4-6pm Rugby Art Gallery & Museum

Throughout the consultation the consultation documents were available for inspection at the following locations:

- Rugby Borough Council’s offices, Town Hall, Evreux Way, Rugby, CV12 2RR,
- Rugby Library and Information Centre, Little Elborow Street, Rugby, CV21 3BZ
- Dunchurch Community Library, The Green, Dunchurch, Rugby, CV22 6PA
- Wolston Library and Information Centre, Warwick Road, Wolston, Coventry, CV8 3GX.

The consultation documents were also made available of the council's website.

The consultation and consultation events were publicised using the council's social media channels. Social media reached 137,777 people. This is a mix of Facebook, Instagram and Messenger users and online ads.

A total of 274 formal written consultation responses were received. 9 respondents submitted more than one response, for example by both submitting an email and an online questionnaire response. Additionally, 61 consultation responses were submitted anonymously via the online questionnaire, without a name or address being supplied. In line with the Statement of Community Involvement, anonymous responses have been rejected.

112 responses were submitted via email, the remainder used the online questionnaire.

172 Responses were from private individuals, 60 were from landowners or developers promoting sites, 12 were from parish councils, 9 were from statutory consultees, 6 were from neighbouring local authorities and 15 were from other organisations.

A YouTube video explaining the consultation was watched 653 times.

A summary of the comments received, by question, is set out below.

LAND FOR EMPLOYMENT USES

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

162 responses were received to this question.

Summary of comments:

- 30 responses questioned the need for additional employment land given high employment rates and existing supply, or (for example, the response of Warwickshire Wildlife Trust) sought as low as possible an allocation.
- Some responses, including those from Coventry City Council, North Warwickshire Borough Council and Harborough District Council and six comments from landowners/developers, endorsed the Coventry and Warwickshire HEDNA. Monks Kirby PC argued that Rugby Borough should take only its fair share of regional need and the focus should be on brownfield and non-Green Belt land.
- 10 responses from residents sought higher levels of employment land provision, with (amongst others) numbers of 250ha, 500ha and 600ha suggested.
- 15 responses encouraged the re-use of existing sites/buildings and raised concerns about loss of countryside.
- 10 responses suggested 150.5ha (the Rugby Borough industrial land requirement 2021-2041 identified in the Coventry & Warwickshire HEDNA) should be the amount planned for (i.e. no contribution to meeting sub-regional logistics need).
- 11 comments from developers identified the likelihood of unmet general industrial need from Coventry based on HEDNA numbers and stated that Rugby Borough should contribute to meeting this.
- Eight responses (including Stretton on Dunsmore PC) endorsed planning for the 2041 (not 2050) requirement. One response questioned planning for need beyond 2041 given likely societal and consumption changes and the growth of robotics and AI. Four responses, including three from developers, advocated planning to 2050.
- Six responses from developers argued that HEDNA numbers should be treated as a minimum.
- Five detailed reports critiquing the HEDNA and providing commentary on alternative projections for future employment land need were put forward by developers.

- Five comments from developers suggested that the HEDNA underestimates employment land need, of these: two stated strategic warehousing need was underestimated; another stated the HEDNA should have included large scale strategic B2; others argued market signals, reshoring/near-shoring and the growth of online retail suggested higher need.
- Four developers put forward comments on how the Coventry and Warwickshire strategic warehousing need should be split between the local authorities. One suggestion was that based on past completions 37% of the need should go to Rugby Borough. Others said a “substantial quantum” or “significant proportion” of the need should be met in Rugby Borough.
- Pailton PC questioned whether home working could reduce future land requirements.
- Two comments stated that the current supply of employment land should be disaggregated between ‘local’ general industrial supply and strategic warehousing supply. Comments noted that much of the existing supply at Ryton, South West Rugby, Coton Park and Prospero Ansty was for strategic warehousing.
- Stretton on Dunsmore Parish Council stated that planning based on a continuation of past trends for road-based logistics is not justified, would increase emissions, conflict with SA objectives and undermine Local Transport Plan 4. A resident highlighted that the trend-based approach to employment growth was predicated on continued inward migration to the borough and this was driving the expansion of HMOs.
- One response highlighted the Employment Land Report prepared by the Coventry and Warwickshire Chamber of Commerce (June 2023) as supporting 20% more employment land than recommended in the HEDNA due to alleged past undersupply.
- One comment highlighted the need for the West Midlands Strategic Employment Site Study to be published before the need for employment land can be quantified.
- One comment highlighted that the largest increases in employment to 2041 are projected to be in hospitality and public services but the HEDNA doesn’t address the land requirements of these sectors.
- One response argued for the importance of planning with West Northamptonshire and Harborough District Council in recognition of the impact of DIRFT and Magna Park.
- One response argued for jobs-to-homes balance to avoid Rugby becoming a commuter town.

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

162 responses were received to this question.

Summary of comments:

- 34 responses mentioned a need for industrial/manufacturing land, including strategic scale manufacturing.
- 36 responses (inc. Pailton PC, Thurlaston PC and Stretton on Dunsmore PC) expressed opposition to more warehouses, particularly large warehouses. Respondents expressed concerns about low skill and salaried jobs, low employment densities, traffic, high land-take use of greenfield land, high levels of existing warehousing including Magna Park and DIRFT, and lack of a diversified economy. Stretton on Dunsmore PC expressed concerns about the impact of warehouses on sustainability appraisal objectives for greenhouse gas emissions, air pollution, diversifying the economy and green recovery.
- 28 responses, including 16 employment land developers and landowners, mentioned the need for warehouses or strategic warehouses.
- 17 responses mentioned a need for offices, including shared office spaces.
- 18 responses sought space for small businesses/smaller units, with one report referencing the 2019 market signals study.
- Many of the responses, including eight developers sought a mix of employment land/diversified economy.
- 10 responses mentioned a need for small or medium “mid-box” warehouses.
- Other uses suggested: tech, services and public sector, solar and wind power (and other green industries), creative industries, small scale food production, vehicle fleet maintenance, research and development, bioscience, live-work units, engineering including expansion of existing employers like Alstom, Colas, Mercia, Arturn, Lench.
- A supermarket chain argued that there is low demand for office space and so only low levels of office space should be planned for.
- One respondent mentioned the need for employment sites in rural areas.
- One respondent argued for allocations for hotels, food and beverage uses, medical and health uses, and schools given these are the sectors with the highest projected employment growth.
- One respondent mentioned the need for HGV parking and storage.

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

175 responses were received to this question.

Summary of comments:

- A high number of responses raised concerns about transport impacts on the road network, in particular at M6 Junctions 1 and 2, the A5, A426 and A4071 and on the northern side of Rugby. Others expressed concerns about HGVs on country roads.
- Some responses noted that highways upgrades would be needed on the A5.
- Some responses expressed concern about building industrial land and residential too close to each other. Some raised this concern in relation to South West Rugby.
- Concerns about traffic noise and air quality at Ryton on Dunsmore were raised.
- Several responses endorsed locations on major roads with the easiest connections to the motorway network.
- Several responses commented on the need for workplaces to be accessible by public transport and bicycle.
- Several responses expressed opposition to development in Green Belt locations. One developer noted the test for Green Belt locations is a “high bar”. A landowner said non-Green Belt locations should be considered first.
- One response pointed out that agricultural land to the south of Rugby is higher quality to that to the north of the town.
- A couple of the responses expressed preference for locations close to Rugby, to greater benefit local residents.
- National Gas requested that the council is mindful of the gas transmission network when selecting sites, while the EA noted the need to consider flood risk
- One developer response suggested the desirability of expanding existing sites.
- 21 responses from landowners/developers promoted the merits of their site.
- Two responses noted concerns expressed by the inspector in the last plan examination about the impact of development at A45 Walsgrave Junction on Coombe Park Grade 2* list and Coombe Pools SSSI.

- One response suggested locations South of Hinckley would meet Leicestershire’s employment need.
- One response argued that locations on the edge of Coventry would meet Coventry’s employment needs and not those of Rugby Borough.
- The Canal & River Trust asked that any development in the vicinity of the canal of feeder channel at M6 Junction 1 or south of Hinckley should protect them from any risk of damage or adverse impacts on water quality.
- A number of comments opposed or raised concerns about specific locations, including comments from Kilsby Parish Council (A5 north of Houlton), Pailton PC (Magna Park), Stretton on Dunsmore PC (A45 corridor), Thurlaston PC (South West Rugby safeguarded land). Thurlaston PC subsequently submitted a petition in relation to sites promoted between the B4429 and M45.
- Moto sought the safeguarding of the area north of the Rugby motorway service area for future expansion.
- National Highways provided preliminary comments on M6 Junctions 1 and 2, A46 Walsgrave Junction, Ryton, A45/A4071, A5 North of Houlton and South of Hinckley.
- Natural England highlighted sites within impact risk zones for Sites of Special Scientific Interest: Ansty Business Park expansion/A45 Walsgrave Junction, within the IRZ for Combe Pool SSSI; Prologis Park Ryton expansion, within the IRZ for Brandon Marsh and Ryton Wood SSSIs; Safeguarded land within the South West Rugby allocation, and A45/A4071 junction, are within the IRZ for Draycote Meadows SSSI; Other issues which may affect these designated sites are water supply, water quality and air quality.
- North Warwickshire Borough Council highlighted the importance of considering highways impact beyond the site.
- One response suggested that the R23/1027 application (Frasers Group, Ansty) is determined first, and if this is permitted no further land would be required. 18 responses were submitted which raised specific concerns/objections to that planning application.
- Severn Trent Water requested early insight into proposed site allocations to ensure capital investment is planned to accommodate future development.

The following locations were specifically proposed by one or more respondent:

M6 junction 2 (north of junction)
Ansty Business Park expansion

A46 Walsgrave Junction
Prologis Park Ryton expansion/A45 Ryton
Safeguarded land within the South West Rugby allocation
A45/A4071 junction/Blue Boar
A5 north of Houlton
A5 generally
M6 Junction 1
South of Hinckley
Rugby East
land south of Coventry Road
Land adjoining Ansty Park – Ansty North
Land adjoining Ansty Park – Ansty East
Land at Coton Park East
North of the M6 and south of the A426
Land to the south side of the M6
Land opposite Magna Park
Land at Ansty
Land at Tythe Platts Farm
Land north of J1, M6
Land to the south of Junction 1 of the M69
Rugby town centre (including for independents)
Europapark expansion
Land south of Dunchuch

Rugby Borough Council response:

Sites promoted by developers, including those listed above which were mentioned in representations and others submitted through the call for sites process, are being reviewed as part of the Housing and Economic Land Availability Assessment and site selection process.

The constraints and information raised by the Environment Agency, Canal & River Trust, National Gas, Natural England, Severn Trent Water will be taken into account in the site selection process.

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

134 responses were received to this question.

The following suggestions were made:

- Incubator sites/units (near Coventry Airport suggested).
- Use of or repurposing empty property, some suggesting Rugby town centre vacant shops or offices.
- Regenerate existing industrial sites, Somers Road, Paynes Lane and Hunters Lane suggested.
- Provide space within large employment sites (potentially as a “planning gain” requirement suggested by Newton & Biggin PC and North Works BC and one developer).
- Expansion of existing sites.
- Rates reduction.
- Use of CPO powers to assemble a brownfield sites.
- Create a technology park or innovation centre.
- Reduce the amount of land given over to warehousing.
- Build small/medium unit estates, sub 1000sqm units (Newton and Biggin PC suggest one option could be for RBC to deliver units itself).
- Provide more self-build options.
- Allowing more small countryside developments.
- Increase space vertically.
- Relocate Rugby tip and reuse that space.
- Small start-up space should be close to housing.
- Allocating more employment land including smaller sites (10 developers).
- Retain Local Plan policy ED1 which supports expansion of existing businesses within existing employment sites.
- Allocate specifically for smaller-scale light industrial (Class E(g)(iii)) and industrial (Class B2) uses and smaller B8 uses.

- Allocate for big box units as they are the most viable and so will drive delivery (landowner).
- No need to allocate as HEDNA anticipates that 67% of current warehouses will be obsolescent as warehouses by 2043 and manufacturing employment will contract (resident).
- Allow existing businesses to expand in the Green Belt (landowner).

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?

155 responses were received to this question.

92 responses supported the proposal (including 8 landowners/developers).

56 responses did not support the proposal (including 6 from landowners/developers).

7 other comments or neutral responses were received.

Summary of comments:

- Objection on the basis that it would limit flexibility in the market.
- Argument that the evidence base isn't there to support sites solely for one sector (2 responses from developers).
- Support but flexibility should be included in the wording of any policy (2 developers).
- Suggestion that the council should allocate for local B8 use too.
- Given the large volume of warehouses becoming redundant over the plan period, there should be a policy of encouraging conversion from B8 to B2.
- Only restrict use to B2 where this is needed for environmental impact reasons.

The following locations were proposed:

M6 Junctions 1 and 2

A45

A4071

A5 near DIRFT

On the borders of Coventry where there is more existing industry

Ryton

North of Houlton

Houlton

Brownfield/regenerating existing sites such as Paynes Lane, Mill Road Industrial Estates, Hunters Lane

Walsgrave

Land to the south side of M6

Clustered around existing concentrations

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

176 responses were received to this question.

40 respondents said there were exceptional circumstances.

127 respondents said there were not exceptional circumstances.

Nine respondents commented without expressing a view as to whether there were exceptional circumstances.

Summary of comments:

- Adequate employment land available outside Green Belt.
- Green Belt release might be required to meet Coventry's unmet need on sites close to the city, this could be exceptional circumstances.
- Not undertaking a Green Belt review would have negative effects on the economy.
- Green Belt review needed to ensure sustainable patterns of employment development and to allocate sites where access is good.
- Lack of reasonable alternatives outside Green Belt to meet HEDNA need.
- Allocating in Green Belt should only be done once non-Green Belt options exhausted.
- An up to date Green Belt review should be carried out, consistent with Green Belt reviews of other councils.
- The HEDNA says Green Belt development will be needed for B8.
- The high employment rate, low unemployment means that a Green Belt review is not necessary.

TOWN CENTRE REGENERATION

7. Do you agree with our proposals to remove the primary shopping area and primary and secondary frontage designations in Rugby town centre?

138 responses were received to this question.

71 responses agreed.

77 responses disagreed.

Summary of comments:

- NPPF para 90 still requires planning policies to define primary shopping areas.
- Traditional centres are too big for the market they serve given online and changes to retail. Need flexibility to evolve Support for flexibility and repurposing units.
- Specific references to Rugby Central, High Street and Sheep Street.
- Concern expressed about impact on older and disabled residents.
- Suggestion that the town centre should be a more compact area.
- Suggestion that medical and education uses should be encouraged.
- Some responses suggested a retail core still needed.

8. Which town centre sites should have site allocation policies and what should they say?

97 responses were received to this question.

Summary of comments:

- A lot of support for redevelopment.
- Several comments suggested the need to retain parking, including station parking with some suggesting free parking.
- Other comments supported improved bus facilities and promotion of active travel, or commented on the centre being overly car-dominated and suggested increased pedestrianisation.
- Comment on the need to change Rugby town centre from a shopping centre to an entertainment centre. However, some other comments sought more retail.
- Objection from Aldi to including the Cemex House site within any potential Rugby Central allocation, unless there is clear recognition of the acceptability of retail use on the site and sufficient flexibility is provided in terms of how it is brought forward.
- Consider the potential for land contamination (Environment Agency).

Specific sites suggested in multiple responses:

- Rugby Town Hall, The Benn Hall and Newbold Rd Car Park (although there were comments expressing support for retaining the Town Hall and Benn Hall buildings and another suggesting more community use of the Town hall)
- Rugby Central
- Webb Ellis Industrial Estate
- Royal Mail and Mill Road Car Park, Stagecoach (suggestion Mill Road Car Park should be developed for housing similar to Chaolais Gardens)
- John Barford Car Park, Old Market Place and Railway Terrace car park, support for this being returned to a market
- Rugby Borough Council depot on Albert Street

Other suggested sites/interventions:

- North Street Car Park (residential)
- Morgan Sindall
- Protection of the independent quarter
- Make North Street one-way and remove the taxi rank
- Office or business reuse of vacant shops (Fargo Village suggested as a precedent)
- More green spaces and quality of open spaces

- Improve walking route from station to town centre
- Alexandra Arms (protect as a pub)
- Destination for events
- Promote heritage, recreation, venues

9. Should we introduce a policy that sets out the improvements to streets and spaces we want to see in the town centre?

136 responses were received to this question.
117 responses supported introduction of a policy.
16 responses did not support introduction of a policy.
3 neutral comments were received.

Summary of comments:

- Policy should ensure delivery of Rugby Regeneration Strategy.
- A lot of support for the policy to cover all of the town centre.
- Support for an indoor market.
- Suggestion that s106 contributions should be used for public realm improvements.
- Support for tree planting.
- Specific areas identified in responses as needing to be covered by the policy:
 - Newbold Road, Corporation Street
 - Clifton Road
 - Rugby Central
 - Old Market
 - Station Gateway
 - Rounds Gardens
 - High Street and Sheep Street
 - Station Place, Albert Street and Murray Road
 - North Street and Evreux Way (suggestions for pedestrianisation/bus only)
 - The Library
 - Market Place
- Policy shouldn't be overly prescriptive (supermarket developer).
- Biodiversity enhancements should also be considered in the town centre. This can include removing areas of hard standing to create more green/blue spaces and retrofitting SuDS on existing buildings (Environment Agency).
- Recognise and protect assets of community value (Pailton PC).
- Policy should make provision for transport, active travel, GI and BNG.

10. Should we define local centres? If yes, which centres should we include?

121 responses were received to this question.
 82 responses supported the proposal to define local centres.
 39 responses did not support the proposal.

Many responses expressed support for designating all of the potential local centres listed in the consultation document. One response said this would help support main town centre uses there and the monitoring of changes. One response suggested leaving the designation of local centres to neighbourhood plans.

One developer response suggested that district and local centres should be identified within any new strategic housing and employment allocations. This will ensure that growth comes forward alongside appropriate community infrastructure.

The master developer of Houlton argued Dollman Darm local Centre and Houlton District Centre shouldn't be defined as centres because the conditions of the Houlton planning permission are adequate to control them and the district centre won't be complete when the new plan is adopted.

Pailton PC questioned whether local centres might be more attractive to residents than the town centre and this could weaken town centre regeneration.

The following specific locations were mentioned:

Name of proposed centre	Number of responses that proposed the centre
Bilton	15
Hillmorton (High Street)	14
Dunchurch	10
Brownsover	9
Houlton	8
Paddox	7
Cawston	5
Clifton upon Dunsmore	6
Coton Park	4
Lower Hillmorton Road	3
Clifton Road	3
Newbold	3
Newton	3
Kingsway	2
Woodlands	2
Eden Park	1
Brinklow	1
Hillside	1
New Bilton	1
Hillside	1
Wolston	1

Shakespeare Gardens/Overlade Lane	1
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11. Are there other things the local plan should do to support town centre regeneration?

127 responses were received to this question.

112 responses felt there were.

15 responses felt there were not.

Summary of comments:

- Free parking (generally, or after 6pm, weekends and on market days suggested)
- More parking, including in local centres at Bilton and Dunchurch
- Reduce traffic flows through the centre, more pedestrianisation
- Active travel and cycle routes
- Electric car charging/improve access by car
- Encourage independent businesses
- More residential uses
- More workspaces
- More green space, park connector project, street trees, floral displays
- School streets scheme
- Diversify offer
- Improve bus services
- Local gardens and shared community spaces
- Reduce business rates
- Bring back an indoor market and improve outdoor market
- Small music and arts/craft venues
- More events, festivals
- Stop further out of town retail (a number of comments identified how Elliotts Field has harmed the town centre)
- Improved the link between the town centre and the railway station
- Education, economic and social projects
- Focus retail/entertainment in one location, contract centre
- More space for the museum, art collection
- New incubator unit
- Social street furniture
- New supermarket in south of town
- Reuse of older buildings
- Compulsory purchase vacant sites
- New café needed at Eden Park
- Give consideration to site feasibility and viability to ensure that developments are deliverable.
- Avoid policies are not unduly restrictive and limit town centre investment and development (supermarket developer).
- Consider impact on the historic environment and seek archaeological advice, in line with NPPF guidelines (Historic England).
- Environmental improvements, tree planting

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?

130 responses were received to this question.

59 respondents agreed with the proposal. 69 respondents did not agree with the proposal.

Two general comments were received.

Summary of comments:

- Not easy to meet even lower pitch target, plan should be realistic.
- Existing sites not fully occupied.
- State need figure (whichever is used) should be a minimum, not target.

Rugby Borough Council response:

In December 2023 the government amended the definition of Gypsy and Traveller in Planning Policy for Traveller Sites. The new definition is

“For the purposes of this planning policy “gypsies and travellers” means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

2. In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life
- b) the reasons for ceasing their nomadic habit of life
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances”

This amends the previous definition which excluded those who had permanently ceased travelling.

The new definition is not the same as the ethnic need used in the GTAA 2022, therefore Rugby Borough Council have commissioned a new Gypsy and Traveller accommodation needs assessment using the new government policy. This research is currently underway.

13. How can we find sites to accommodate the need for Gypsy and Traveller pitches?

- (a) Allocate sites for Gypsy and Traveller pitches as part of new employment land or housing developments?**
- (b) Regularise existing unauthorised sites?**
- (c) Create a new borough or county council-owned site?**
- (d) Other (please explain).**

135 responses were received to this question.

32 respondents supported allocation of pitches as part of new employment land or housing developments, two stating employment sites only.

64 respondents supported the regularisation of existing unauthorised sites.

57 respondents supported the creation of a new borough or county council-owned sites.

Summary of other comments:

Other options suggested were:

- Proactively identify and allocate new private sites, rather than being reactive (Shilton & Barnacle PC).
- On sites with derelict buildings.
- Sharing the sites between the rural and urban areas.
- Not regularising sites subject of outstanding enforcement action where it has been determined that they are inappropriate on planning grounds.
- Speak to the communities and find out where they want to be.
- Expanding existing sites.

Other comments:

- One landowner expressed concern about the viability impacts of an integrated Gypsy and Traveller site and the relationship between residents and the site.
- Environment Agency sought policy wording that “pitches should be located outside of the 1 in 100 year, plus an allowance for climate change, flood extent”.
- Stretton on Dunsmore PC opposed a general policy of regularising unauthorised sites as it would encourage more.
- Stratford-on-Avon District and Warwick District called for Rugby Borough to meet its own need before asking other authorities.

14. When allocating sites for pitches, what size of site should we be seeking to allocate?

91 responses were received to this question.

Summary of comments:

- One large (20 pitch) site and a number of small 2-5 pitch sites
- 10-20 pitches
- Max 1-2ha
- 2 acres
- 10-12 pitches maximum (8 responses, including North Warwickshire Borough Council)
- 5 or 6 pitches maximum (2 responses)
- 10/12 caravans (2 responses)
- Proportionate to size of existing settlement, services and facilities
- Smaller sites provide community balance/integrate better, put less pressure on local services
- Ask the community what they need (3 responses)
- There should be a maximum size of a site within a parish and restrictions on nearby sites (5 miles suggested)
- Small or large
- Prefer more small sites over fewer large sites (Shilton & Barnacle PC)
- Avoid aggregation of multiple sites in close proximity (Shilton & Barnacle PC)

15. Should we adopt a negotiated stopping policy which allows caravans to be sited at a suitable location for an agreed and limited period.

121 responses were received to this question.

63 (including Shilton and Barnacle PC and Pailton PC) supported a negotiated stopping policy.

58 did not support a negotiated stopping policy

Pailton PC said it would support such a policy, but only if supported by local community.

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?**

149 responses were received to this question.

120 supported the proposed policy.

29 did not support the proposed policy.

Summary of other comments:

- 30 responses suggested the policy should apply across borough to avoid displacement.
- 16 responses suggested limiting the policy to central Rugby or specific wards.
- 4 responses supported a stronger policy (for example 5% within 200m radius).
- Specific concerns expressed by multiple respondents about New Bilton and Benn Ward or Rugby town centre generally.
- Six responses suggested that there is a need to develop smaller, cheaper housing to remove the need for HMOs, Thurlaston PC suggested housing association/council housing needed.
- Four responses made a link between the development of warehousing and the proliferation of HMOs.

17. We also propose to introduce a criteria-based policy that sets clearer standards for parking, refuse storage, and the adequacy of external and internal space for HMOs. Do you support such a policy?

151 responses were received to this question.

140 supported the proposed policy.

11 did not support the proposed policies.

One neutral comment was received.

Summary of other comments:

- Several responses raised concerns about the adequacy of car parking, one mentioned bin facilities .
- One response noted that HMOs will need to play an important role because of the rising age of first-time buyers and that high quality HMOs are required.
- The Environment Agency commented as follows: “HMOs often have ground-floor sleeping accommodation. This puts those on the ground floor at the highest risk of flooding. Therefore, in areas within the 1 in 100 year plus climate change, we recommend HMOs should 1) When they are new build, have finished floor levels set a minimum of 600mm above the 1 in 100 year plus climate change level; or 2) When they are change of use, raise finished floor levels to 600mm above the 1 in 100 year plus climate change. If this is not possible, a water exclusion strategy and flood resistant construction should be put in place and there should be no ground floor sleeping.”.

CLIMATE CHANGE POLICIES

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

157 responses were received to this question.

123 supported identifying areas where wind and/or solar energy will be supported.

24 did not support identifying areas where wind/solar will be supported.

10 other comments were received.

The following locations were suggested:

- 28 responses (including two major industrial land developers) suggested renewable energy on or near to industrial land, including solar panels on roofs.
- 26 responses said wind and solar should be allowed anywhere in the Borough that is suitable. 5 of those responses specifically said that this should include Green Belt land.
- 18 responses suggested solar panels on motorway/A-road central reservations or verges.
- Six responses expressed opposition to solar or wind energy on Green Belt land.
- Six responses suggested renewable energy generation in residential developments or on homes.
- Two responses argued the need to protect farmland, while two others stated support for solar only on farmland (not wind).
- Two responses suggested solar panels on the roofs of public buildings.
- One response from a landowner promoting a solar farm was received.
- Churchover PC expressed concern about the impact of solar farms.
- One respondent said there were very special circumstances for identifying sites for renewable energy in the Green Belt.
- Warwickshire Wildlife Trust said that solar farm locations should be selected to reduce biodiversity impact.
- Natural England stated that care should be taken to safeguard the best and most versatile agricultural land.

- One response stated that on-shore wind is the cheapest source of energy.
- Moto Hospitality Limited suggested that the neighbouring field north and west of Rugby motorway service area is suitable for ground mounted solar to support EV charging.

19. If some new wind development schemes could be community owned by RBC residents, would that increase your support for this type of development?

138 responses were received to this question.

85 responses said their support for wind energy schemes would be increased by community ownership.

53 responses indicated that it would not affect their support for this kind of development.

One response suggested creation of a community energy trust

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?

150 responses were received to this question.

112 responses (including Prologis and Segro and Thurlaston PC) supported the proposed policy.

37 did not support the proposed policy.

One response was unsure/neutral

Summary of comments:

- This should be close to existing grid infrastructure.
- 12 responses suggested support for this technology anywhere in the borough.
- 7 suggested locating on industrial land.
- 4 expressed doubt about the green credentials of either hydrogen or battery energy storage.
- One response opposed Green Belt locations.
- One response said that renewables should be favoured ahead of these technologies.
- Two responses suggested utilising vacant buildings in Rugby town.
- One developer said there is scope for energy storage within large scale industrial and logistics developments to contribute or meet their own operational needs.
- One developer said given the fast-moving pace of technological change in this sector it is important to maintain flexibility and not introduce mandatory requirements.

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

184 responses were received to this question.

157 responses (including two developers, Warwickshire Wildlife Trust, The Woodland Trust and the Environment Agency) supported a minimum tree canopy policy for new development.

18 responses including 10 landowners/developers did not support a minimum tree canopy policy for new development.

9 other responses were received.

Summary of comments:

- 63 responses felt this should apply everywhere and to all new developments.
- Six responses raised concerns about the loss of existing trees.
- Four responses suggested tree planting in existing areas.
- Four responses suggested a 15% requirement (one referencing this as the old National Forest requirement), another suggested 25%, the Woodland Trust suggested 30%
- Seven developers/landowners raised viability concerns with the policy.
- Four responses argued the policy was not needed because of biodiversity net gain or would potentially conflict with that policy.
- Four responses, including that of the Home Builders Federation, asked for additional evidence to justify the policy.
- Three stated the policy wouldn't be deliverable on some sites due to constraints.
- Three sought flexibility in the policy.
- Three suggested along roadsides while another suggested trees should not be planted near roads (a minimum of 5 metres away).
- One response suggested allergenic trees like Birch shouldn't be planted. One response suggested native trees. One suggested heritage fruit trees. Natural England, The Woodland Trust and the Environment Agency argued that the maximum proportion of new trees should be native, UK and Ireland sourced and grown as won't introduce pests.

- Natural England stated “tree planting may not be appropriate for all sites, and may not in itself increase biodiversity, carbon sequestration or urban cooling, and trees can take many years to reach maturity. A variety of habitats should be considered... Where tree planting or other habitat creation is undertaken the specimens chosen must be a range of local native species, and a management plan implemented to insure their establishment.”.
- One landowner suggested that a minimum tree canopy policy would be easier to apply and to understand the viability impacts of, than would setting biodiversity net gain at greater than 10%
- One resident, supporting the proposal, stated that trees reduce surface temperatures through shade and evapotranspiration, enhance the look of environments, shelter wild life and are good for mental health.
- One response said the Tree Score Equity Map would show where trees are needed the most.
- One developer response stated it would be incompatible with large-scale B8 warehousing development where a very large footprint is needed.
- Newton and Biggin PC stated that Warwickshire County Council support would be needed, given its historic opposition to street trees.

Other options suggested:

- 2 responses suggested this should apply on large developments, with one suggesting 20+ houses.
- All residential developments over 10 units (2 responses).
- residential development only (2 responses).
- All residential over 5 units.

22. Should we identify priority locations or allocate sites for biodiversity net gain and, if so, where?

163 responses were received to this question.

127 (including 11 developers/landowners) responses supported the identification of priority locations or site allocations for biodiversity net gain.

25 responses did not support the identification of priority locations or site allocations for biodiversity net gain.

11 other responses were received.

Summary of other comments:

- Large habitat creation on identified sites is likely to maximise the biodiversity net gain that can be achieved.
- Having reasonable options for off-site improvements will assist developers who can't meet requirement on-site.
- Hold a call for sites specifically to request land to be considered for BNG (three respondents).
- Prioritise connectivity between green/blue spaces (Environment Agency).
- Seek 20% Biodiversity New Gain (Woodland Trust, Warwickshire Wildlife Trust) with The Woodland Trust suggesting a 50 year maintenance period.
- BNG sites should either be located on land managed exclusively for nature conservation purposes or at existing/new country park sites that, despite being publicly accessible, are managed appropriately to maximise BNG.
- Site allocations that can provide more than 10% BNG should be prioritised.
- Identify sites of limited ecological interest to maximise gain (developer).
- Off-site contributions should go to "demonstration sites" close to Rugby so residents can enjoy nature nearby or to improving connectivity around key habitats which emerge from the nature recovery strategy.

Locations suggested included:

- On site/as close as possible to site (6 responses)
- Within borough (6 responses)

- Expand existing sites (6 responses)
- Anywhere (3 responses)
- Swift Valley (2 responses)
- Alongside waterways
- South of Hillmorton (2 responses)
- South of Rugby (2 responses)
- Old disused gold course next to Brandon Marsh wildlife centre
- Rounds Gardens
- Ansty
- On low quality farmland
- On urban/rural periphery
- North of Houlton
- Alongside disused railway lines
- Area south of St Cross Hospital

23. Would you support the creation of an additional country park as part of delivering biodiversity net gain?

164 responses were received to this question.

145 responses (including Natural England, Environment Agency) supported the creation of an additional country park as part of delivering biodiversity net gain.

15 responses (including Warwickshire Wildlife Trust) did not support the creation of an additional country park as part of delivering biodiversity net gain.

4 other responses were received.

Summary of other comments:

- Opportunity to create a community park at Prologis Park Ryton West (developer), similar community park proposal at land at Walsgrave (also developer).
- Country parks should be run and managed by borough council to retain direct control over delivery of BNG, this would be simpler than having to rely on offsetting providers in the private market also has wider benefits for residents in access to countryside and recreation opportunities (two developers).
- Residents should be able to walk/cycle to sites.
- Country parks would need to be high quality habitat (not amenity grassland or open water) and should prioritise habitat connectivity (Environment Agency).
- Concern about policies that go further and faster than national guidance could undermine emerging BNG local markets (Home Builders Federation).
- County parks are often noisy, busy, sites which allow access to dogs, and noisy play areas. Areas for biodiversity net gain, should be for that purpose and as such managed to conserve and enhance wildlife and important habitats (Warwickshire Wildlife Trust).
- This shouldn't just include large country parks but also community orchards and woodlands (Stretton on Dunsmore PC and resident).

Locations suggested included:

- Cawston woods/within South West Rugby site (10 responses)
- Houlton/between Houlton and Crick (6 responses)
- Quarries (Astons farm/Cemex (5 responses)

- Rainsbrook Valley (6 responses)
- North of Rugby/Coton Park (5 responses)
- Hillmorton/south of Hillmorton (4 responses)
- South Rugby/Dunchurch (4 responses)
- Clifton upon Dunsmore/between Houlton and Clifton upon Dunsmore (4 responses)
- Swift Valley/Elliott's Field (2 responses)
- Avon river floodplain (2 responses)
- Ansty (2 responses)
- Monks Kirby
- Brook Valley Nature Reserve, Queen's Diamond Jubilee Woodland
- Near Draycote reservoir
- Wolfhamcote or Grandborough parish
- Land behind Rounds Gardens
- Along old Great Central railway line
- West of Rugby near Cemex

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

171 responses were received to this question.

142 responses supported a requirement to prioritise the delivery of biodiversity gain within close proximity to the development.

24 responses did not support a requirement to prioritise the delivery of biodiversity gain within close proximity to the development.

Five other/neutral response was received.

Summary of other comments:

- Support where mitigation cannot be met on site (developer, Environment Agency).
- There could be a potential for conflict with policies which seek to centralise or consolidate areas for the provision of BNG and in such circumstances the benefits of consolidation should prevail (developer).
- Policy not necessary in light of national legislation/would conflict with that legislation (three developers, two land promoters, one landowner).
- Concern that it could prevent sites being developed if there is no nearby suitable BNG site (two developers, landowner).
- The plan should reference on site delivery, off site delivery and statutory credits (Home Builders Federation).
- There should be flexibility in the requirement depending on the type of habitat which is required.
- Close proximity is difficult to define and creates the potential for ransom strips for nearby landowners (developer).
- Could lead to piecemeal/smaller net gain (landowner).

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

175 responses were received to this question.

130 responses supported a requirement for all residential developments to be net zero.

40 responses did not support a requirement for all residential developments to be net zero.

Five neutral/other comments were received.

Summary of comments:

- Viability evidence is needed (landowner, developer).
- Concern about impact on viability (three developers, West Midlands Housing Association Planning Consortium).
- Policy would be onerous (developer).
- Policy should be flexible to support viability and delivery (Homes England).
- Building Regulations are the most appropriate way of controlling building energy performance, changes to Building Regs coming (five developers, landowner, Home Builders Federation, Homes England, West Midlands Housing Association Planning Consortium, North Warwickshire Borough Council).
- Concern that bespoke local policy would undermine economies of scale (developer).
- Explore opportunities for waste management and resource efficiency (Environment Agency).
- Need to consider the role of the current building stock in diminishing carbon emissions (Historic England).
- Cornwall is a unique case because of government investment (developer).
- Should only be mandatory for EIA development, but encouraged for smaller development.
- There should be a transition period (Pailton PC).

- An alternative could be a presumption in favour of zero carbon development (care home developer).

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

176 responses were received to this question.

137 responses supported a requirement for all non-residential developments to be net zero.

31 responses did not support a requirement for all non-residential developments to be net zero.

Eight other/neutral comments were received.

Summary of comments:

- Policy needs to be justified by viability evidence (two developers).
- Viability concerns raised (landowner).
- Operational stage new zero carbon is often out of the control of the developer to manage as it depends on occupier requirements (developer).
- New zero is a realistic prospect for the large scale industrial and logistics sector (developer).
- Onerous policies would undermine delivery (developer). Developer support would be important (Newton & Biggin PC).
- It would help if neighbouring authorities adopt the same standards.
- In accordance with the recent Written Ministerial Statement the council should not set energy efficiency standards that go beyond the current or proposed building regulations (land promoter).
- Policy should be flexible/encourage rather than require (land promoter, developer).
- Some types of commercial or industrial development won't be able to achieve net zero because of operational requirements (land promoter).
- Supported where feasibility and viability allow (supermarket chain).
- Topic is being addressed through Building Regulations (land promoter, developer, two landowners, North Warwickshire Borough Council).
- Difficult to agree a definition of new zero (landowner).
- Policy should consider the existing building stock (Historic England).

- Further information needed on proposed standard (landowner).
- Policy should only be mandatory for EIA development, but encouraged for smaller development (resident).
- Suggest alternative as “presumption in favour of zero carbon development” (care home developer).
- NHS property could benefit from offset funds.

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

98 responses were received to this question.

Summary of comments:

Eleven responses (included Thurlaston PC and Natural England) highlighted sustainable drainage and a reduction of hard impermeable surfaces. Two of the responses raised concerns about large hard surfaced areas at warehouses.

Nine responses suggested construction of more cycle lanes and/or improved facilities for walking.

Seven responses highlighted the importance of new green spaces and/or trees, and four including Warwickshire Wildlife Trust mentioned green roofs.

Five responses expressed support for avoiding building on flood plains.

Five responses suggested reducing new building/housebuilding/warehouse building.

Five responses (including Thurlaston PC) mentioned improving public transport.

Five responses (including Thurlaston PC) mentioned building insulation with one mentioning insulating existing homes.

Five (including the Environment Agency) suggested rainwater harvesting.

One response argued climate policies destroy jobs and businesses, questioned the scientific basis for human-caused global warming, and stated that Britain is only responsible for a small proportion of global emissions. Three expressed concern about the cost of complying with policies.

Two responses suggested renewable energy generation (not tied to other developments), with three others suggesting that the council invest in renewable energy generation including solar panels on council buildings.

Three responses highlighted air quality issues due to traffic, with one tying that to HGVs.

Others mentioned in one or two responses:

- Avoid policies that go further or faster than national policy as this leads to a patchwork of local standards (Home Builders Federation);
- Introducing a policy in support of renewable energy development in the Green Belt (landowner);
- controlling Green Belt development;

- EV charging, including in car parks;
- limiting parking provision, introducing residential parking permit requirements for wider areas;
- restricting national permitted development rights which allow hard surfacing of front gardens;
- retrofitting RBC buildings to be net zero;
- lifetime impacts of developments;
- white/reflective roof surfaces to reflect sunlight back into space;
- district heating;
- Allocate for community orchards and woodlands (resident and Stretton on Dunsmore PC) or community allotments (Warwickshire Wildlife Trust);
- Extra care housing can be sustainable when located in rural areas outside villages (care home developer);
- Demanding criteria for new helipads.

Other proposals, which fall outside of the scope of planning policies included:

- need for National Grid to support more generation of electricity from residential and commercial developments;
- carbon capture;
- improved recycling;
- communal green travel;
- infrastructure for hydrogen cars;
- intelligent street lighting;
- improving or enlarging Draycote Water;
- repairing potholes;
- banning natural gas.

28. Should we require non-residential development to meet higher water efficiency standards to reduce water usage?

165 responses were received to this question.

139 responses supported a requirement for non-residential developments to meet higher water efficiency standards to reduce water usage.

19 responses did not support a requirement for non-residential developments to meet higher water efficiency standards to reduce water usage.

Seven neutral/other comment were received.

Summary of comments:

- Policy would need to be flexible as may be difficult for some operators to achieve and this could stifle economic growth (land promoter, developer) policy should encourage not require (developer).
- Viability concern (developer).
- Standards should be set through building regulations, not planning policy (developer)/ duplicating part G of the Building Regulations and forthcoming changes to the Building Regulations could cause confusion (landowner, developer).
- Policy would need to be fully justified and supported by a viability appraisal (developer).
- There should be rain water harvesting and grey water systems for large development (resident).
- Different councils operating different policies could slow development (developer).
- It would be helpful if neighbouring local authorities adopted similar policies (Newton and Biggin PC).

DESIGN CODING AND GUIDANCE

29. Should we produce design codes as part of our new local plan?

162 responses were received to this question.

136 responses supported the production of design codes as part of our new local plan.

19 responses did not support the production of design codes as part of our new local plan.

7 other responses were received.

Summary of comments:

- Producing a design code as part of a local plan would add additional expense and slow down the process (two developers).
- Design codes should be prepared collaboratively with developers (Home Builders Federation, developer).
- Current applications should be taken into account in producing a design code.
- Design codes are useful for giving specific areas an identity.
- Design codes should not be too prescriptive.
- Design codes should be informed by all statutory consultees and stakeholders and not conflict with other local plan policies (developer).
- Design codes should reflect the difference characteristics of different places.
- Design codes should identify design principles that take account of the nature and multi-functional role of the canal network and consider how new development proposals can benefit from waterside locations (Canal & River Trust).

30. Which areas should design codes cover?

(a) Borough-wide

(b) Borough-wide divided into character areas

(c) only for some neighbourhoods (please specify which),

(d) only for large new development sites

(e) other (please specify)

151 responses were received to this question.

47 responses supported a borough-wide design code.

76 responses supported a borough-wide design code divided into character areas.

3 responses felt that design codes should be only for some neighbourhoods.

23 responses supported design codes only for large development sites.

Two other comments were received.

Summary of other comments:

- Three responses felt that design codes should cover some neighbourhoods only, with Eden Park and Victorian terraces suggested.
- Three developers sought a flexible approach to design, based more on guidance than prescription.
- Pailton PC supported a borough-wide design code but suggested that large developments could jump start the policy and suggested the use of neighbourhood plans and village design statements.
- Two developers stated small to medium sized sites don't require design codes.
- One respondent suggested borough wide minimum quality and dwelling size requirements, similar to the London Plan.
- Two respondents suggested design codes should be introduced for conservation areas or other areas of architectural or historic value.
- One respondent felt that design codes would produce bland results and discourage modern or challenging architecture.
- One response felt that money would be better spent on other things than on the production of design codes.

- The master developer of Houlton said it should be exempt from the policy because there is already design coding in place for the site through the outline planning permission
- The Home Builders Federation stated that the most appropriate scale for any Design Code or Guidance is therefore likely to depend on the size, scale and type of development it is being applied to. A Site-Wide Masterplan prepared in conjunction with a site allocation would need to be different from a Design Brief for a city centre regeneration opportunity, or a small-scale development in a village.

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)

182 responses were received to this question.

83 responses supported minimum local housing need.

46 responses supported the HEDNA 2022 need.

48 responses suggested other options.

Five other/neutral comment was received .

Summary of other comments:

- 14 responses opposed building any more homes, citing infrastructure concerns.
- Two responses sought more social housing.
- The Home Builders Federation suggested the housing requirement was more than both the HEDNA and standard method. This view was also expressed by two residents and several landowners/land promoters and developers (as detailed below).
- Nine responses (four land promoters, four developers, landowner) said there would be unmet need from Coventry.
- Nine responses (three land promoters, five developers, landowner) argued the need to uplift to provide more affordable housing.
- Six responses (from three land promoters, two developers and the Home Builders Federation) argued the need to uplift from the HEDNA to sustain economic growth.
- Four responses (land promoter, two developers, land owner) argued the HEDNA should be a minimum.
- Three (landowner, land promoter, developer) argued planning to 2050.
- Two landowners responded supporting adding a 10% supply buffer.

- One developer argued that the HEDNA underestimated migration to Rugby Borough from London.
- The HEDNA doesn't demonstrate exceptional circumstances to justify departure from standard method, it exaggerates methodological issues in population estimates for Coventry and would risk under-supplying homes (developer).
- Supply is over-estimated (developer).
- A higher housing target would harm nature recovery (Warwickshire Wildlife Trust).
- The HEDNA is more robust evidence (Warwick and Stratford on Avon district councils).
- Oppose accommodating Coventry's unmet need (Thurlaston PC, Stretton on Dunsmore PC).
- There are exceptional circumstances based on overestimation of Coventry's population (landowner).
- If HEDNA is used it should be adjusted for suppressed household formation (developer).
- In 2025 ONS will publish household projections which correct for the Coventry issue and the standard method will be updated (developer).
- Plan period should be re-based as data becomes available.

The following other options were put forward:

- One response favoured a job-creation led housing target.
- Two responses (including Thurlaston PC) suggested a housing target between the standard method and HEDNA numbers.

32. Would you support RBC both improving existing and developing new social and affordable housing (like the regeneration of Rounds Gardens and Biart Place)?

161 responses were received to this question.

143 responses supported improving existing and developing new social and affordable housing.

15 responses did not support improving existing and developing new social and affordable housing.

3 other comments/neutral responses were received.

Summary of comments:

- One affordable housing developer and one land promoter argued for an uplift to total housing need to deliver more affordable housing.
- One developer response suggested distributing affordable housing across the borough, rather than concentrating it in one location.
- One resident supported more affordable housing but not at the expense of green space.

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?

153 responses were received to this question.

Summary of comments:

Numerous responses from developers/landowners promoted specific sites.

Conversely, many respondents expressed their opposition to development in specific locations, often citing infrastructure, traffic or landscape concerns. At least 41 responses mentioned one or more locations in which the respondent opposed development.

Seven responses expressed opposition to development of Green Belt, while eight responses expressed opposition to development at villages.

Fewer resident responses expressed support for development in specific locations. The most popular such location was Rugby town centre (six responses). Three responses advocated for a policy of concentrating development at urban locations with better access to services. Conversely, two responses favoured a more dispersed pattern of development including smaller villages.

All of the indicative locations garnered some support from one or more respondent. Additional locations mentioned included Monks Kirby, Brinklow, Newton.

Other comments:

- Anti village developments (8 responses including Stretton on Dunsmore PC).
- Avoid Green Belt (8 responses), one developer stated there is no evidence for exceptional circumstances for Green Belt release.
- Anti Ryton on Dunsmore (4 responses).
- Anti Stretton on Dunsmore (5 responses including Stretton on Dunsmore PC based on floor risk, narrow roads and the sewage pumping station discharging into Princethorpe Brook also argue that Squires Road and Little Orchard shouldn't have been allocated).
- Anti Wolston.
- Anti east of Coventry.
- Anti south of Hinckley.
- Anti Wolvey (3 responses).

- Anti south of Hillmorton/Rainsbrook Valley (13 responses including Kilsby Parish Council).
- Anti South West Rugby (6 responses – including Thurlaston PC).
- Anti Clifton upon Dunsmore (7 responses).
- Anti Rugby generally.
- Pro main rural settlements in order to ease the pressure on the urban area (2 responses).
- Pro brownfield/town centre (6 responses).
- Pro east of Coventry (6 responses).
- Pro Wolston .
- Pro south of Hillmorton (4 responses).
- Pro Ryton on Dunsmore (3 responses).
- Pro south of Hinckley (2 responses).
- Pro Newton (developer).
- Pro Binley Woods (2 responses).
- Pro Dunchurch (3 responses).
- Pro Wolvey (2 responses).
- Pro Stretton (1 response).
- Housing should be close to public transport or urban areas to reduce car use (2 responses).
- Suggest development at smaller villages/ pro dispersal (2 responses).
- Housing should be close to employment areas .
- Pro Clifton upon Dunsmore (if A5 junctions upgraded).
- Favour large development with facilities over small dispersed sites

- Pro west of Rugby.
- Suggest development at Brinklow, Long Lawford and Monks Kirby.
- Objection to Linden Tree Bungalow allocation based on concerns about safety of access.
- Be mindful of gas/electricity assets in assessing sites (National Gas, National Grid).
- Comprehensive Green Belt study needed (landowner).
- Protect canal infrastructure from damage in considering site allocations and ensure development enhances role of canal corridors (Canal & River Trust).
- Consider education infrastructure requirements, the new plan should identify specific sites for school places to support growth (Department of Education).
- Produce a HELAA to ensure a strong and robust evidence base (Environment Agency).
- Allocate a range of sites across the settlements, with a preference for sites of 200-300 homes which can be delivered more quickly than the large SUE sites and deliver affordable housing (land promoter).
- Provide a range of deliverable and developable sites, 10% of housing requirement should be on sites no larger than one hectare (Home Builders Federation).
- If the Council allocated the South West Rugby safeguarded land for development (housing or employment) there needs to be a mechanism for it to contribute to and share the cost of infrastructure provision (Home England).
- Centre growth at borough's most sustainable settlements, with any new strategic allocations focusing on the town of Rugby (land promoter). Larger villages with more facilities may be more sustainable than urban edges remote from facilities (Newton & Biggin PC).
- Emphasis non-Green Belt location first (developer).
- Green Belt locations are the most sustainable and deliverable, site selection should focus on accessibility, community and social facilities, BNG and reducing carbon emissions (developer and land promoter).

- Additional development at South West Rugby on top of that which is already planned may mean that existing improvement plans require revision to ensure the full growth risk is resolved (Severn Trent Water).
- There are likely to be constraints with Rugby Newbold Wastewater Treatment Works (WwTW) due to the environmental capacity of the receiving waterbody, meaning that revisions to permits are increasingly tight and difficult to meet considering the best available technology (Severn Trent Water).
- Support extra care housing in rural locations (developer).
- Most important criteria in selecting new sites should be sustainability, including public transport (resident).
- In selecting sites avoid the Best and Most Versatile agricultural land.

34. Do you support a requirement for all new dwellings to meet the additional Building Regulations standard for accessible and adaptable dwellings and for at least ten percent of dwellings to be suitable for wheelchair users?

155 responses were received to this question.

123 responses supported the proposed requirements. Among the supporters were five developers.

29 responses did not support the proposed requirements.

Three neutral/other comments were received.

Summary of comments:

- Those objecting cited concerns about viability, need for additional evidence to justify the policy.
- Two response expressed concern that the policy may not be technically deliverable.
- One developer and the Homes Builders Federation said it isn't needed in light of Building Regulations. Another suggested that future changes to Building Regulations will remove the need for this.
- Three responses from developers stated they would support the policy, but it should be flexibly applied to take into account site constraints and viability.

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

114 responses were received to this question.

Summary of comments:

- Affordable homes/homes that are affordable (26 responses) one response noted a need for social housing in the urban area.
- 2 and/or 3 bedroom homes (20 responses).
- Bungalows (17 responses).
- 1 beds/small homes (11 responses) – 2 responses suggested this will combat HMOs.
- Homes for ageing population (10 responses).
- More diversity of house sizes/a wide mix (6 responses).
- Call for flexibility site by site and to respond to market conditions (5 responses from developers).
- Improved quality homes (4 responses).
- Self-build plots (4 responses although Home Builders Federation stated that it does not support a percentage of units on a site being for self build)
- Apartment buildings (3 responses).
- Larger/executive homes (3 responses).
- Maisonettes (3 responses).
- Support use of HEDNA evidence on housing mix (2 responses).
- Larger 3 or 4 bed social housing.
- Purpose-built HMOs.
- Allocate sites for extra care (extra care developer) with the Home Builders Federation also calling for the allocation of sites for specialist development.
- Specialist care accommodation, not just adaptable housing (extra care developer).

- Passivhaus/carbon neutral homes.
- Affordable housing for NHS staff (NHS Property Services).
- Homes England noted that the HEDNA housing mix doesn't align with the Rugby Borough Council Housing Strategy 2022-2024 housing mix.
- One developer response opposed the Nationally Described Space Standard.

OTHER TOPICS

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

123 responses were received to this question.

Issues raised in multiple responses:

- Healthcare: Hospital provision/GPs/dentist/pharmacies (18 responses).
- Pot holes/ road improvements/traffic congestion (15 responses).
- Schools (13 responses).
- Inadequate parking (10 responses).
- Bus provision improvements and multi-mode passes (8 responses).
- Need for sport/leisure/play facilities/green corridors (8 responses).
- Sustainable drainage including rain water storage/flooding/water quality (8 responses, including Severn Trent Water response with proposed policy wording).
- Pro sustainable travel and creation of cycle paths (5 responses).
- More local services/facilities in large developments (5 responses).
- Green Belt protection (4 responses).
- Police and fire (4 responses).
- Protection of the rural landscape (3 responses).
- Rugby Parkway Station (2 responses) + one suggestion of a station at Long Lawford.
- Approach to Rugby town centre on A426 (attractiveness of) (2 responses).

Other issues raised (non-exhaustive list):

- Speed limit reduction.
- Opposition to '15 minute neighbourhoods'.
- Heritage preservation.

- Rerouting HGVs out of central Rugby.
- Appointment of sustainability champion.
- Poor design quality of new houses.
- Long-term food security.
- Swift bricks and hedgehog friendly boundaries in new developments.
- Need for more community/cultural spaces and protection of existing facilities.
- Creation of a rugby club with infrastructure for Premiership level to raise profile and attract visitors to the town.
- Opening up to the public of the tunnel under the station.
- Bus rail interchange.
- Local plan not overriding neighbourhood plans.
- Affordable housing.
- Improve footpath from Rugby to Draycote on disused railway line.
- River water quality in River Avon catchment (Stretton on Dunsmore PC).
- Need for additional allotments.
- Light pollution from warehousing (Churchover PC).
- Need for a site for a new Sikh temple (Rugby Sikh Gurdwara).
- Sites for locally produced food.
- Unadopted roads create problems for residents of new developments.
- Canal network should be recognised as a non-designated heritage asset (Canal & River Trust).
- Engage with Department of Education in preparing the plan and prepare a planning for schools topic/background paper setting out how forecast housing growth is translated into an identified need for a specific number of school places and schools (Department of Education).

- Groundwater and contaminated land should be a key sustainability issue (Environment Agency).
- Policy should require development to improve the ecological status of waterbodies to meet Water Framework Directive objectives as well as conserving and enhancing existing watercourses and riverside habitats (Environment Agency).
- Call for a heritage topic paper of heritage assessment section within a wider evidence document (Historic England).
- Don't deviate from 10% biodiversity net gain (Home Builders Federation).
- Local Plan should link with local nature recovery strategy (Home Builders Federation, Warwickshire Wildlife Trust) and applying it in site selection (The Woodland Trust).
- Everyone should be no more than 300m from their nearest natural green space. Apply Woodland Trust Access to Woodland Standard – 2ha wood within 500m of every home (Woodland Trust).
- Adopt Bristol Tree Replacement standard (Woodland Trust).
- Protect non-designated habitats like potential local wildlife sites (Warwickshire Wildlife Trust).
- Update green infrastructure evidence and identify corridors (Warwickshire Wildlife Trust).
- Incorporate playing pitch calculator and refer to Playing Pitch Strategy (Sport England).
- Allocate land for sports clubs that need new pitches e.g. Old Laurentians RFC (Sport England).
- Policy on protecting non-designated heritage assets including Coventry Stadium (Save Coventry Speedway).
- Produce updated evidence on landscape, Green Belt, transport, heritage, habitats and open space (resident).
- Identify new footpath provision (resident).
- Protect Princethorpe Biodiversity Area.

- Request for s106 contributions for health infrastructure (NHS Property Services).
- Oppose policy that would try to retain surplus NHS estate in alternative community use (NHS Property Services).
- Seek policy on healthy developments including health impact assessment, active travel, access to health food, design promoting social interaction (NHS Property Services).
- Designate Local Green Spaces (Natural England).
- Prepare a strategic transport assessment (National Highways).

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

155 responses were received to this question.

127 responses supported bolstering policies on sustainable travel.

23 did not support bolstering policies on sustainable travel.

5 neutral responses or other comments were received.

Summary of comments:

- Four responses specifically sought links to Warwickshire County Council's Local Transport Plan 4 (LTP4) and a forthcoming transport plan for Rugby produced by the county council.
- One respondent, a developer, noted that LTP4 states that modern strategic logistics centres represent an opportunity to substantially reduce the carbon footprint of logistics through the efficiency and by accommodating electric vehicle charge points. The same respondent noted that LTP4 stated that it is important to located logistics on major routes.
- Stretton on Dunsmore Parish Council noted LTP4 Policy Position F1 to drive a mode shift of freight transport from road to rail.
- The Canal and River Trust noted the importance of canal towpaths for active travel.
- One resident stated that the problem wasn't the absence of policies but their under-enforcement.

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

139 responses were received to this question.

110 supported a policy protecting stadia.

28 did not support a policy protecting stadia.

One other comment was received neither expressing opposition or support.


The following stadia were put forward for protection:

- Sports Connexion, Ryton
- Coventry City training facilities
- Coventry Stadium, Brandon
- The Queen's Diamond Jubilee Centre
- All school sports fields and rugby and football pitches
- The Rugby Football Club
- Golf courses
- Rugby Town FC, Butlin Road
- Rugby Borough Football Club
- Ashlawn Recreation Ground
- Rugby School
- Rugby Gymnastics Club
- Rugby Thornfield Indoor Bowls
- Old Laurentians

Summary of other comments:

- Two comments suggested the creation of a rugby stadium in Rugby. Another argues new stadia are needed.
- One objecting response from a developer argued that a specific policy would duplicate national policy on protecting community facilities.
- Save Coventry Speedway argued for restoration of Coventry Stadium for speedway and stock car racing, but also its use for low capacity community uses (such as a gym, climbing wall, cycle training track, mountain bike track, links to National Cycle Network) and a museum for speedway and stock car racing.

APPENDIX 1: PRESS NOTICE



RUGBY BOROUGH COUNCIL

**TOWN AND COUNTRY PLANNING
(LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012, SECTION 18**

Notice is hereby given of the publication of the Rugby Borough Council Local Plan Review Issues and Options for public consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The public consultation will run between Monday 30 October 2023 and 5pm on Friday 2 February 2024.

The Issues and Options consultation document and supporting evidence will be available for inspection on the council's website:
www.rugby.gov.uk/localplan

In addition, hard copies are available for inspection at the following locations:

- Town Hall, Evreux Way, Rugby, CV12 2RR,
- Rugby Library and Information Centre, Little Elborow Street, Rugby, CV21 3BZ
- Dunchurch Community Library, The Green, Dunchurch, Rugby, CV22 6PA
- Wolston Library and Information Centre, Warwick Road, Wolston, Coventry, CV8 3GX.

Consultation responses can be submitted via:

- online consultation form at www.rugby.gov.uk/localplan
- email to localplan@rugby.gov.uk with 'Local Plan Review: Issues and Options' in the subject line
- post to Local Plan Review: Issues and Options, Development Strategy Team, Town Hall, Evreux Way, Rugby, CV21 2RR

If you wish to be kept informed about future stages of the local plan review, please state this in your consultation response.

APPENDIX 2: CONSULTATION STRATEGY

Rugby Borough Local Plan Review – Issues and Options Public Consultation Strategy

Document Title: Rugby Borough Local Plan Issues and Options	
What we are doing, and why	
Nature of Plan being Prepared	This document is the first round of public consultation on the new Rugby Borough Local Plan.
Purpose of Consultation	The aim of this consultation is to ensure the wider public are aware of the review of the plan and give the public and other stakeholders an opportunity to submit representations.
Nature of issues that need to be consulted upon	There are a number of stages a plan must go through prior to adoption. This first stage is a broad consultation on the overall approach the new plan should take, including whether, and to what extent, we should review the plan at this time
Why we are consulting	<p>We are carrying out this consultation to ensure all individuals and groups who may be affected by or have an interest in the Local Plan have the opportunity to voice their opinions on whether and how to proceed, and what content should be considered if a full or partial review of the plan is progressed.</p> <p>Our ambition is therefore to publicise the consultation as widely as possible using all available tools at our disposal and going above and beyond the statutory requirements and even those identified in our Statement of Community Involvement.</p>
When consultation will take place	This consultation will run for eight weeks from Monday 30 October to Friday 22 nd December 2023.
How we will publicise the consultation	
Direct notifications	<p>In accordance with the Regulations and the council’s Statement of Community Involvement the following groups will be notified directly of the consultation. This will be done by email where possible with letters sent to those for whom an email address is not available:</p> <ul style="list-style-type: none"> • all statutory consultation bodies; • all parish councils; and • all groups and individuals who have opted to be on the council’s consultation database.
Direct engagement with Parish Councils	In addition to directly notifying Parish Councils, we will hold an event where three representatives of each parish council will have the opportunity to engage with officers and ask their questions.

	<p>We want to engage closely with Parish Councils in recognition of their unique understanding of their local communities, and the role many are playing in neighbourhood planning.</p>
Local publicity	<p>The consultation will be promoted in the following ways, in line with the council's Statement of Community Involvement:</p> <ul style="list-style-type: none"> • information and documents will be published on the council's website; • the consultation will be advertised in the local newspaper; and • paper copies of the documents will be available to view at the Town Hall, Rugby Library, Dunchurch Community Library and Wolston Library. <p>In addition to making consultation documents available at the above locations, a series of display boards will also be provided to draw further attention.</p> <p>We will also ask parish councils to publicise the consultation in their parish newsletters/magazines and on noticeboards.</p> <p>We will identify community and faith groups and contact them to let them know about the consultation.</p>
Use of digital technology	<p>We will promote the consultation via the Council's social media channels:</p> <ul style="list-style-type: none"> • Facebook • Twitter <p>We will work with the Communications team to schedule social media posts to coincide with the launch of the consultation, the mid-point, and a final reminder of the consultation deadline as a minimum.</p> <p>Social media may also be used to promote events (see below) scheduled through the consultation period, which will enable interested parties directly engage with officers to ask questions.</p> <p>We will also explore the potential to develop a short, animated video to explain in 2-3minutes what the consultation is and why it is important. Such videos have been used to some effect for both the Warwickshire Local Transport Plan, and the South Warwickshire Local Plan Issues and Options.</p> <p>The video may be shared via the following methods:</p> <ul style="list-style-type: none"> • On the Council website • Via the social media channels outlined above • At events (see below)
Events	<p>A series of events will be held to enable interested parties to obtain further information and have their questions answered.</p>

	<p>Some of these events will be in person, and some online. This provides different opportunities for individuals to engage directly with officers, allowing for different personal preferences, capacity to travel, and balancing such events with other commitments.</p> <p>Exact dates, times and locations are to be confirmed, but in outline the following is proposed:</p> <p>Online events (MS Teams)</p> <ul style="list-style-type: none"> • two open 1 hour events, at least one to be in the evening • A short (15minute) presentation from officers to outline the context, followed by 45-minute Q&A • Questions to be added in the chat function <p>In- person events</p> <ul style="list-style-type: none"> • Six in person events – drop-in sessions at Rugby town centre, Dunchurch, Wolston, Cawston, Brownsover, Wolvey
Engagement with the business community	The Senior Economic Development Officer will publicise the consultation with the Chamber of Commerce, Warwickshire Growth Hub and local businesses.
Accessible Inclusive Consultation	<p>As outlined above the consultation will be promoted both online and in the local newspaper and the document will be available to read both online or in hard copy form.</p> <p>In addition to this, to ensure the consultation is accessible and inclusive, the following measures will be put in place:</p> <ul style="list-style-type: none"> • Paper copies of the documents can be posted out to individuals upon request; • Individuals can call or email to discuss the document with a planning officer; • Adapted versions of the document can be produced on request, e.g. large print; • Representations can be submitted by email or post.
How comments will be taken into account	<p>Each representation will be read and carefully considered. Representations will be taken into account in the preparation of the new plan along with national policy and the evidence base.</p> <p>Before a plan can be adopted it must be examined in public by a planning inspector.</p>
How comments will be reported	<p>A consultation statement will be published following the close of the consultation. This will include:</p> <ul style="list-style-type: none"> • a list of the persons consulted; • a summary of each representation; and • a comment on how each representation has been considered.