

SHARED INTELLIGENCE

Health Impact Assessment – Rugby Borough Local Plan

September 2016

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Executive Summary

Overview

Public Health Warwickshire is committed to providing Health Impact Assessments (HIAs) against each of the county's district and borough core spatial strategies, and where relevant strategic site allocation plans and neighbourhood plans. The World Health Organisation (WHO) define Health Impact Assessments (HIA) as a means of assessing the health impacts of policies, plans and projects.¹

The Rugby Borough Emerging Local Plan, completes the core spatial policy in Warwickshire. This HIA is therefore cognisant of prior work and considerations. The HIA, commissioned as an independent assessment, has been delivered to coincide with the sustainability appraisal of the Local Plan, a requirement set forth in the National Planning Policy Framework (NPPF). Broadly speaking, an HIA needs to take into account the emerging Infrastructure Delivery Plan (IDP), relevant spatial and health policy and preferred options and strategic sites identified in the Local Plan.

There is no statutory obligation to undertake a HIA on a spatial development plan but the NPPF indicates (paragraph 171) that local authorities should work with public health leads and organisations to gain a contextual understanding of health needs of the local population. It is good practice therefore that throughout this process, consultation has taken place with stakeholders including Coventry and Rugby Local Estate Forum (LEF), the Local Strategic Partnership (LSP), Rugby Borough Council and lead by Public Health at Warwickshire County Council.

Health and population profile

Rugby Borough is projected to experience steady population growth, increasing by 30% between 2010 and 2035, greater than any other district in Warwickshire. This is due to a number of factors including migration, increased birth rates, a rise in those living in non-traditional family units, as well as an increased life expectancy.²

The highest rates of projected population growth will be among those aged over 65 (projected to increase by 63% by 2035) an even greater population increase is projected among for those over 85 (191% by 2035).³ This is pertinent when evaluating the suitability of spatial strategy and the safety and sustainability of housing and transportation options in the town.

Employment figures are high in Rugby relative to both the West Midlands and England average. The employment rate has risen sharply in Rugby since 2010 and in 2015, there was an 84.1% employment rate. This was a 12.8 percentage point increase since 2010.

The health profile for Rugby produced by Public Health England (PHE) in 2016 paints a positive picture in comparison with national statistics on health and deprivation. Despite a relatively positive

¹ <http://www.who.int/hia/en/>

² In the period 2000-2002 life expectancy in Rugby was 76.9 years for males and 80.6 for females. By 2009-2011, this had increased to 79.6 years for males and 83.5 years for females (ONS).

³ ONS: 2010 subnational population projections

health summary Public Health Warwickshire (PHW) is committed to addressing negative health impacts and outcomes. PHW suggested three priority areas for the 2016 Rugby PHE profile:

- Addressing drugs and alcohol.
- Mental wellbeing.
- Tackling obesity.

These priorities are based on figures which show admissions to hospital for alcohol related harm and for self-harm are worse in Rugby than the Warwickshire average.

Rates of obesity among adults in Rugby falls close to the Warwickshire average and are better than the England average with approximately one quarter of residents obese.⁴ Public Health Warwickshire is committed to reducing rates of obesity which can lead to diabetes, heart disease, cancer and strokes among other issues.

An area of concern in Rugby which requires highlighting is death and injury caused on roads. The rate of those killed or seriously injured on Rugby's roads is worse than the national average. This is important when assessing spatial policy and its impact on health.

County-wide, the Warwickshire Joint Strategic Needs Assessment (JSNA) has identified a set of priorities for addressing the areas of greatest need in the county. These are:

- Vulnerable young people: Looked after children; educational attainment of disadvantaged children; vulnerable young people.
- Mental wellbeing: Mental health of adults and children; dementia.
- Long-term conditions: Cancer and cardiovascular disease.
- Physical wellbeing: Weight management; smoking/smoking in pregnancy; substance misuse and alcohol.
- Carers: Young carers and adult carers.

This HIA has taken these factors into consideration and, as a result, the recommendations outlined below, and expanded on in the Conclusions and Recommendations section, provide contextual priorities for consideration. A set of recommendations have also been made against wider measures to be considered at a partnership level.

Conclusions and Recommendations

The local plan takes a broadly positive approach to health and wellbeing. However, aspects of the plan could be enhanced with a greater level of attention paid to what outcomes planning may have on health.

- Development in the centre of Rugby will be positive for health because it will encourage more active lifestyles with more walkable neighbourhoods offering greater ease of access to health services and amenities.
- Policies which promote and encourage private car use must be carefully considered as car use can encourage sedentary lifestyles, impact on air quality and make streets

⁴ Up to date figures for obesity are not included in the 2016 PHE profile and are taken from the 2011 mini JSNA for Rugby Borough

more dangerous. Frequent and reliable buses, walkable neighbourhoods, protected cycle lanes and a 20mph speed limit should all be promoted to encourage sustainable modes of transport and traffic calming and reduce air pollution.

- Involvement of healthcare providers and commissioners at an early stage in any planning or development process will lead to better decisions about the requirement and function of healthcare facilities.
- The population of Rugby is projected to increase most among age groups over 65. New developments should be designed to encourage independence and mobility for all residents including older people to promote active lifestyles and reduce reliance on healthcare provision.
- Fast food and alcohol when not consumed in moderation can cause negative health and mental health concerns. Where possible the planning system should be used to restrict fast food takeaways, bars and off licenses which encourage excessive drinking as well as ensure the presence around schools, hospitals and healthcare facilities can be limited.
- The Local Plan is a broad document. HIAs should be undertaken on new supplementary planning documents to assess more specific potential health impacts to ensure learning is passed on.

A more detailed set of these recommendations is found in the Conclusions and Recommendations section at the end of this report.

1 Introduction

- 1.1 This is a Health Impact Assessment on the Rugby Borough Local Plan. The task of the HIA has been to evaluate each of the policies contained within the Rugby Borough Local Plan and assess the impact on health against a set of five determinants for health and wellbeing. In section 5 - Health Impacts and Recommendations - the most important policy impacts for health are highlighted alongside a set of recommendations.
- 1.2 The work of assessing policy impact to draw out health impacts and requisite recommendations was conducted through the design and population of a policy matrix. This evaluated each of the policies contained within the local plan and cross-tabulated against the impact on health and wellbeing. The policy matrix itself can be found in appendix 1.
- 1.3 This document is the final HIA to be undertaken against a core development plan for a Warwickshire district / borough. Four of the other five districts / boroughs in Warwickshire already have an HIA completed against their local plans.
- 1.4 While the HIA is not a statutory requirement, it is recommended in the NPPF (paragraph 171). The intention to undertake HIAs against core spatial policy in Warwickshire originates from Public Health Warwickshire's Annual Report 'The picture of ill health in Warwickshire'⁵ published in 2012 in which it provided five recommendations:
- All public-sector organisations in Warwickshire commit to carrying out Health Impact Assessments on all new major plans and policies to ensure that the maximum health gain is achieved including Core Strategies and Neighbourhood Plans.
 - Health and wellbeing should be included as core considerations in every planning and transport policy in Warwickshire and as part of the District and Borough Council's Core Strategies and Neighbourhood Plans as part of becoming a health improving local authority.
 - Some funding from Community Infrastructure Levies on new developments are used to address local health and wellbeing issues and where necessary carry out more in depth Health Impact Assessments.
 - Organisations contact the Public Health Warwickshire department to discuss how to take forward a Health Impact Assessment.
 - The Warwickshire Health and Wellbeing Board champions the use of Health Impact Assessments as a way of addressing the social determinants of health and reducing health inequalities.
- 1.5 These five recommendations determined the approach taken to delivering this HIA in support of the Rugby draft Local Plan.

⁵ <https://apps.warwickshire.gov.uk/api/documents/WCCC-630-6>

- 1.6 The Rugby Borough Local Plan is the core policy document on development in Rugby covering the period 2011 – 2031. The local plan has been drawn up by Rugby Borough Council and is intended to guide development and decisions on whether planning permission should be granted.
- 1.7 To assess what impact relationship each policy has on health, five determinants for health were created. The determinants draw from both Dahlgren and Whitehead's *'Introducing the Wider Determinants of Health'* model and from a literature review drawing on evidence for positive health outcomes influenced by planning decisions.
- 1.8 An important component of the HIA was consultation of the Coventry and Rugby Local Estates Forum (LEF) and the Rugby Local Strategic Partnership (LSP). Whilst the HIA method undertaken was largely desk based, it was through these two consultation phases that a greater insight into health outcomes from the built environment and an understanding of the health estates requirements in Rugby was gained.

2 HIA Approach and Methodology

2.1 There is no single standardised methodology for conducting an HIA. However, a number of guides and tools have been produced by different organisations specifically for assessing development plans. This HIA draws on the methods described in the following documents:

- Rapid Health Impact Assessment Tool - London Healthy Urban Development Unit [HUDU];
- A review package for Health Impact Assessment reports of development projects – Ben Cave Associates; and
- Health Impact Assessment: a guide for local authorities – Public Health Institute of Scotland.

2.2 Adapting methodology from these HIA tools, three core stages to the HIA were decided upon to deliver a comprehensive report with evidence base, consequences and recommendations.

2.3 These stages included:

- **Stage 1** – scoping exercise to understand demographic changes, health profile of residents, employment profile and associated development plans to bring forward development growth. Completion of a literature review of best practice for HIA, planning and health.
- **Stage 2** – health impacts of the local plan and recommendations to enhance the plan were extracted using a comprehensive policy matrix which assessed local plan policies against a set of five health and wellbeing determinants.
- **Stage 3** – consultation with stakeholder groups to drive recommendations stemming from organisations concerned with public health in Warwickshire. Prior to consultation, a draft policy matrix and a summary of conclusions and recommendations was circulated. Following comment from the LEF and the LSP these recommendations were updated.

Stage 1

2.4 Key to completing an HIA is an understanding of the demographic, health and economic base of the area. Key data sources were used such the Office of National Statistics (ONS) and the Department of Work and Pensions (DWP), Sport England and Warwickshire Observatory to extract a profile of Rugby. This enabled a review of the key concerns and considerations for Rugby against which to assess the overall health impacts of the draft Local Plan.

2.5 In doing so, the process helped to address several key questions to consider the health impact of core strategies and policies. These were:

- Does the Local Plan have a clear vision for health and wellbeing that emphasises the importance of prevention through addressing wider determinants of health and health policy?
- Is the draft Local Plan making a sustainable impact on health outcomes?

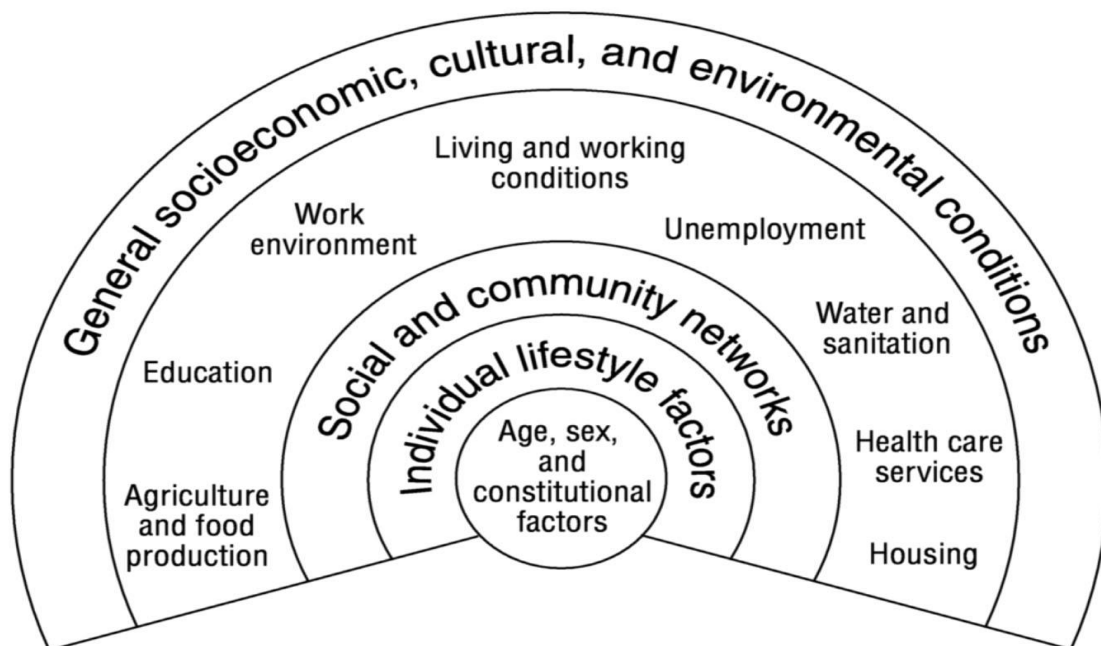
- How can healthy living be further brought about by plans and policies in place? What can be done to support local communities to achieve this position?

2.6 In considering these questions throughout the process, it enabled an evaluation of key Local Plan policies and supplementary documents and an understanding of the impact to enable recommendations and mitigation.

Stage 2

Each of the policies in the local plan was assessed using a set of five health determinants. The greatest impacts were assessed to drive related recommendations. To configure the health determinants, the Dahlgren and Whitehead Wider Determinants of Health model (see Figure 1) was considered, alongside documents which were in scope during our literature review. To comprehensively assess health impacts of policy, a policy matrix was designed. Using the policy matrix, health impacts and recommendations were drawn out and written up as seen in section 5. The matrix can be found in appendix 1.

Figure 1 - Wider Determinants of Health - Dahlgren and Whitehead 1991



2.7 The key health determinants used in this HIA are below:

- Lifestyle and wellbeing, including: mental health, drug, tobacco and alcohol misuse, diet and nutrition, obesity, exercise and physical activity.
- Economic and social wellbeing including: employment, adequate housing, social network/support, social cohesion, social infrastructure including schools, healthcare and community facilities.
- Environment including, physical safety, air quality, accessibility for disabled residents, safety for older and vulnerable residents and crime.
- Access to services and amenities including: healthcare, children's education, roads, social services, healthy food shopping, leisure and sports facilities, green spaces.
- Transport: how accessible and active?

Stage 3

- 2.8 In conducting the HIA two stakeholder consultations were held. The first with the Rugby Local Strategic Partnership (LSP) and the other with the Coventry and Rugby Local Estate Forum (LEF) to test findings highlighted from a draft of the policy matrix.
- 2.9 The Rugby LSP are partners from voluntary and community sector (VCS), statutory and business organisations who have completed work on *Our Rugby, Our Future - A Regeneration Strategy for Rugby 2016-2019* and which outlines the LSP's plans to tackle unemployment, increase community cohesion, help residents access education and training, and improve health and wellbeing.
- 2.10 The meeting with the Rugby LSP took the form of a half hour meeting with LSP members to whom a draft of the policy matrix had been circulated prior to the meeting. A short round table discussion followed.
- 2.11 The Coventry and Rugby LEF was formed on 25th September 2015, to plan strategic estate needs in Coventry and Rugby that may impact on the health estate.
- 2.12 A one-hour round-table discussion was held with the Coventry and Warwickshire LEF. As with the LSP, members of the LEF had been sent a draft of the policy matrix and were asked to comment on the matrix and to consider challenges facing NHS estates in Rugby.
- What are the LEF (estate related) challenges in delivering the health requirements for Rugby?
 - How can the Local Plan support these requirements?
 - What else could be included in the current set of planned policies to deliver health outcomes?
- 2.13 Input from both the LSP and LEF consultations were fed into this HIA. A note of both sessions is included at appendix 2 in this report.

3 Literature Review

- 3.1 In addition to completing the health profile a literature review was undertaken. Documents reviewed included HIA guides and tools, guides to planning and health, evidence on specific health issues, reviews of health-related planning issues, as well as a set of evidence reviews produced by WCC. Alongside the health profile, the literature review fed into completion stage 2 of the HIA: impacts and recommendations.
- 3.2 Each of the documents reviewed is categorised and summarised.

HIA Assessment Tools

- 1- [A review package for Health Impact Assessment reports of development projects](#) – Ben Cave Associates (2009)

A review package for HIA undertaken against development policy and proposals. The review package provides criteria for considering the quality of completed HIA reports. The document can be used by those producing a HIA to judge whether their work is of a good standard.

- 2- [Health Impact Assessment: a guide for local authorities](#) – Public Health Institute of Scotland (2006)

The guide was produced for the Public Health Institute of Scotland and Convention of Scottish Local Authorities (CoSLA). An overview for councils in Scotland on how and why an HIA should be carried out. The document describes prospective HIA, meaning those HIAs undertaken on proposals. The methodology used is similar to that of this document; a desk based methodology for undertaking prospective HIAs meaning those HIAs undertaken on proposed policy, rather than an existing development.

- 3- [Rapid Health Impact Assessment Tool](#) – London Healthy Urban Development Unit [HUDU] (2013)

The tool is designed for use by those assessing the likely health impacts of development plans and proposals, including planning frameworks and masterplans for large areas, regeneration and estate renewal programmes and outline and detailed planning applications. It outlines the steps for conducting a rapid HIA, a methodology similar to that of this document. The HUDU guide contributed to a reading of policy when undertaking this HIA.

Planning and Health Guides

- 4- [Healthy Urban Planning Checklist](#) – London Healthy Urban Development Unit [HUDU] (2013)

The Healthy Urban Planning Checklist builds on the Healthy Urban Planning in Practice for the Olympic Legacy Masterplan Framework report produced in September 2011. The checklist supports the implementation of the Host Boroughs' Strategic Regeneration Framework Convergence Framework and Action Plan 2011-2015 and its aim to improve the life chances of people living in East London and to reduce health inequalities.

5- [Implications for Spatial Planning – The Marmot Review \(2011\)](#)

An evidence review intended to complement work done by NICE.⁶ The review highlights the “clear interrelationship between planning policy and health and health inequalities” and the weakness in national planning policy which does not substantively focus on health impacts. The guide was one of the documents used to guide key determinants of health used in this HIA.

6- [Using the planning system to control hot food takeaways – London Healthy Urban Development Unit \[HUDU\] \(2013\)](#)

A good practice guide which recommends a coordinated approach to limiting unhealthy fast food takeaways. It identifies challenges when using the planning system to control proliferation of hot food takeaways and makes a set of recommendations councils should use to restrict such businesses.

Warwickshire County Council – Relevant Documents

7- [Green Space Priorities for Warwickshire – Warwickshire County Council \(2015\)](#)

WCC evidence review document which summarises positive health outcomes which access to green space can influence. Recommendations are made across various subjects including physical and mental health, exercise and healthy eating.

8- [Neighbourhood Development Planning for Health – Warwickshire County Council \(2015\)](#)

Evidence and guidance for promoting healthy and active communities when involved in the neighbourhood planning process. Draws on the Building for Life 12 principles which is the industry standard for new housing development. The principles encompass a neighbourhood approach to design and include headline recommendations for safe streets and roads, access to public transport and access to public services including shops, schools, workplaces, parks, play areas, pubs and cafes. The concept of five-minute walkable neighbourhoods (in which all basic amenities can be reached with a five-minute walk) is promoted.

9- [Public Health Evidence for Planning and Developers \[draft\] – Warwickshire County Council](#)

A document produced by WCC provides public health evidence of the benefits for integrating health and wellbeing into the planning process. Like the ‘Neighbourhood Development Planning for Health’ document (above) it uses the Building for Life 12 principles, the industry standard for new housing development.

10- [Warwickshire Health and Wellbeing Strategy 2014–2018 – Warwickshire Health and Wellbeing Board \(2014\)](#)

Health and Wellbeing strategy produced by the Warwickshire Health and Wellbeing Board. The strategy promotes independence and community resilience and integration. NB: this health and wellbeing strategy for Warwickshire was produced by the Warwickshire Health and Wellbeing Board and is a different document to the health and wellbeing strategy produced by WCC.

11- [Warwickshire Joint Health and Wellbeing Strategy 2012 – 2015: Public Consultation – Warwickshire County Council \(2012\)](#)

Health and wellbeing strategy for Warwickshire written to encourage and receive feedback from the public. There is more detail than the one produced by the Health and Wellbeing Board and the

⁶ National Institute for Health and Care Excellence

document highlights priorities directly relevant for planners including housing, communities and places, as well as NHS estates and social care services. NB: this health and wellbeing strategy for Warwickshire was produced by WCC and is a different document to the health and wellbeing strategy produced by the Warwickshire Health and Wellbeing Board.

Public Health and the Built Environment

12- [Childhood Obesity: A Plan for Action](#) – HM Government (2016)

A plan of action for dealing with childhood obesity. The document asserts how the document plans to deal with obesity in children and contains details on a levy for sugary soft drinks, strategies for business to make their products healthier and improving healthy options offered in the public buildings; including schools and hospitals and encouraging children to get more active.

13- [Obesity and the environment: increasing physical activity and active travel](#) – Public Health England and the Local Government Association (2013)

A briefing which addresses action on promoting environments where people are more likely to work or cycle for short journeys. It summarises the importance of action on obesity and a specific focus on active travel, and outlines the regulatory and policy approaches that can be taken.

14- [The School Fringe: What pupils buy and eat from shops surrounding secondary schools](#) – Sinclair, S and Winkler JT – Nutrition Policy Unit: London Metropolitan University (2008)

This research project recorded what pupils buy from fringe shops, the full range of their purchases, at all times of the school day. Despite substantial work undertaken by schools to improve the health of pupils both in school canteens and through education much of this work is undone if children can leave school and easily access sweets and soft drinks from fringe shops.

15- [Physical activity: walking and cycling](#) – National Institute for Health and Care Excellence [NICE] (2012)

Guidance that set forth how people can be encouraged to increase the amount they walk or cycle for travel or recreation purposes. This will help meet public health and other goals such as reducing traffic congestion and obesity due to sedentary lifestyles where travel is often undertaken by car.

16- [Can Walkable Urban Design Play a Role in Reducing the Incidence of Obesity-Related Conditions?](#) – American Medical Association (2016)

Study from America which found that rates of obesity are lower in more 'walkable neighbourhoods' even after adjustments to age, gender and income are factored in. The study asserts that insufficient walking and low level activity contributes to prevalence of obesity and diabetes. Living in neighbourhoods where walking is fundamental to routine will improve health.

17- [The Health Impacts of Cold Homes and Fuel Poverty](#) – Marmot Review Team (2011)

Reviews the existing evidence of the direct and indirect health impacts suffered by those living in fuel poverty and cold housing. The report asserts the need to tackle fuel poverty through policy intervention. Cold homes contribute to health inequalities experienced overwhelmingly by those living in England's most deprived wards.

18- [Improving access to green spaces](#) – Public Health England/UCL Institute of Health Equity (2014)

Evidence review commissioned by PHE and written by the Institute of Health Equity (IHE). There is increasing evidence on the health benefits of access to good quality green spaces. The benefits include better self-rated health; lower body mass index, overweight and obesity levels; improved mental health and wellbeing; increased longevity. However, access to green space is unequal and people living in more deprived places are less likely to have access to gardens or green space.

Mental Wellbeing

19- [Loneliness and Isolation Evidence Review](#) – Age UK (2014)

Evidence review forming part of a series produced by Age UK, to provide evidence to underpin decision-making for people involved in commissioning, service development, fundraising and influencing.

20- [Would you be happier living in a greener urban area? A fixed-effects analysis of panel data](#) – European Centre for Environment and Human Health (2013)

UK based study which contends those living close to green space and parks in urban areas were less likely to suffer from depression and anxiety and that mental wellbeing were more likely. Though the effects at the individual level were deemed small, the potential cumulative benefit at the community level highlights the importance of policies to protect and promote urban green spaces for well-being.

21- [How to look after your mental health using exercise](#) – Mental Health Foundation (2016)

A how to... guide which describes how physical activity and sport can improve one's mental wellbeing. The guide lists several studies which have demonstrated the importance physical activity can have on mental wellbeing. The guide can be used as a literature review and hyperlinks each of the studies which are referenced.

22- [Cheers? Understanding the relationship between alcohol and mental health](#) – Mental Health Foundation

Over the past fifty years, alcohol consumption has doubled in the UK. 38% of men and 16% of women drink above recommended limits and can be classed as having an alcohol use disorder. This report considers the inter-relation between mental health and alcohol and how drinking to cope with stress, anxiety or difficult emotions can compound such problems.

Construction: building design and mitigation of disturbance

23- [Draft Code of Construction Practice: London-West Midlands Environmental Statement](#) – High Speed Two (HS2) Limited (2013)

Draft document outlining control measures and standards to be implemented in phase one of the HS2 project. Includes measures for mitigation of the effects of construction. These list issues which can arise from large construction projects such as dust, exhaust/traffic, noise and other disturbance.

24- [Mixed Communities: Evidence Review](#) – Department of Communities and Local Government (2009)

Evidence review produced to help government decide on the future of mixed communities' policy. The intention of the review is to compare traditional regeneration of deprived neighbourhoods with mixed community regeneration which would involve subsidisation of affordable housing with private housing.

25- [Lifetime Neighbourhoods](#) – Department of Communities and Local Government (2011)

Report commissioned by DCLG which brings together research and best practice examples of Lifetime Neighbourhoods. Neighbourhoods which are designed to be inclusive of all residents regardless of age or disability.

26- [Building for Life 12](#) – Building for Life 12 Partnership (2015)

Guide to Building for Life 12, a government endorsed set of principles for building successful housing. Produced by Nottingham Trent University on behalf of Building for Life Partnership (Design Council Cobe, the Home Builders Federation and Design for homes)

Gypsy and Traveller Health

27- [The health of Gypsies and Travellers in the UK](#) – Race Equality Foundation and Department of Communities and Local Government (2008)

Briefing paper on health issues for Gypsies and Travellers in the UK. The paper highlights low take-up of services by communities.

28- [Inequalities experienced by Gypsy and Traveller communities: A review](#) – Equality and Human Rights Commission (2009)

An evidence review of health inequalities experienced by the Gypsy and Traveller community to present a broad picture of the issue.

4 Rugby Health and Population Profile

4.1 Key to completing the Health Impact Assessment is an understanding of the demographic, economic and health base of Rugby.

4.2 Rugby falls under the Coventry and Rugby Clinical Commissioning Group (CCG). It is responsible for planning, organising and buying NHS-funded healthcare for around 490,000 people in the Coventry and Rugby areas. This includes most hospital and community NHS-funded services, though not primary care or specialised services. NHS Coventry and Rugby CCG is a membership organisation, representing all 75 GP practices in the area.

Rugby

4.3 In 2016 PHE produced a Health Profile for Rugby. The profile presents a varied but broadly positive picture with rates of deprivation lower than the England average and life expectancy for men and women greater than the England average. Breastfeeding is common in Rugby and far more prevalent than the England average. GCSE attainment is similar in Rugby to the England average. However, the profile highlights areas which Rugby must address. Approximately 20% of adults in Rugby are obese.⁷ Whilst rates of smoking are better than average 131 people died from smoking related illness.⁸ One area, with specific relevance to spatial policy, where Rugby does worse than average is death and serious injuries on roads.

4.4 Headlines from Public Health England's profile of Rugby are below:

- Deprivation is lower than average in Rugby, however 12% of children live in low income families.
- Life expectancy is higher than average in Rugby for men and women, though it is four years lower for women in the most deprived areas of Rugby.⁹
- 16.7% of children (year 6) are obese whilst 20.4% of adults are obese.
- Violent crime, long-term unemployment, drug misuse and death from cardiovascular disease are less prevalent in Rugby than they are nationally.

4.5 PHW identified three local priorities for Rugby highlighted in the 2016 PHE report. These are:

- Addressing drugs and alcohol
- Mental wellbeing
- Tackling obesity

4.6 In comparison to figures for the other districts and boroughs within Warwickshire the picture for Rugby is varied. Rugby performs better for life expectancy between its wards except in all

⁷ The 2016 PHE profile does not include updated figures for adult obesity. Adult obesity figure is from the 2015 profile which sourced 2012 data.

⁸ Figure based on an annual average across 2012-14

⁹ Figures for men not included

Warwickshire districts besides North Warwickshire. Rugby falls somewhere in the middle for childhood obesity when compared with other districts but performs better than all districts in Warwickshire for breastfeeding initiation.

- 4.7 Rugby performs poorly compared to the other districts in Warwickshire for alcohol related and self-harm caused hospital stays. A clear indication of why is highlighted in the 2016 PHE profile. Death caused by smoking for people in Rugby is at median level with other districts performing both better and worse. A wider comparative picture for Rugby in terms of wellbeing and deprivation is summarised in Figure 2.

Warwickshire

- 4.8 The purpose of Warwickshire's Joint Strategic Needs Assessment (JSNA) is to establish a shared, evidence-based consensus on the key local priorities across health and social care. The needs of Warwickshire's population are complex, wide-ranging and varied. In order to focus on the areas of greatest need, Warwickshire's health and wellbeing priorities have been determined through the JSNA prioritisation process. These are:

- Vulnerable young people: Looked after children; educational attainment of disadvantaged children; vulnerable young people.
- Mental wellbeing: Mental health of adults and children; dementia.
- Long-term conditions: Cancer and cardiovascular disease.
- Physical wellbeing: Weight management; smoking/smoking in pregnancy; substance misuse and alcohol.
- Carers: Young carers and adult carers.

- 4.9 The 2014/15 Warwickshire JSNA Review offers an important snapshot at the current state of play in the county. Key findings included:

- Cardiovascular disease is the leading cause of death in Warwickshire accounting for approximately 1,400 deaths (28%) a year.
- In 2012/13 17, 16.7% of mothers in Warwickshire were estimated to smoke during pregnancy. This is higher than the England average.
- 1 in 3 people in Warwickshire are regularly drinking above the lower risk levels, an estimated 153,000.
- In Warwickshire 26,000 children require Child and Adolescent Mental Health Services. 16,659 of these are classed as 'tier 1' which may include sleeping difficulties or feeding problems.
- 15,315 children were considered to be living in poverty in 2011. This equates to 14% of all children in Warwickshire.
- Estimates suggest that 21.8% of adults in Warwickshire are classified as obese, with 2 in 3 adults defined as carrying excess weight.

- 4.1 **The Warwickshire Observatory Quality of Life** report is an annual assessment of a range of data and information describing people, places and communities within the county. With regards to health, the 2014/15 report's key findings were:

- Life expectancy levels in Warwickshire are better than the regional and national averages, with healthy life expectancy also comparing well.
- Nearly 64,000 residents are projected to have their activities ‘limited a lot’ by 2037, an increase of 65% on current levels.
- Compared to the national picture, Warwickshire is doing well on most premature mortality indicators, other than liver disease.

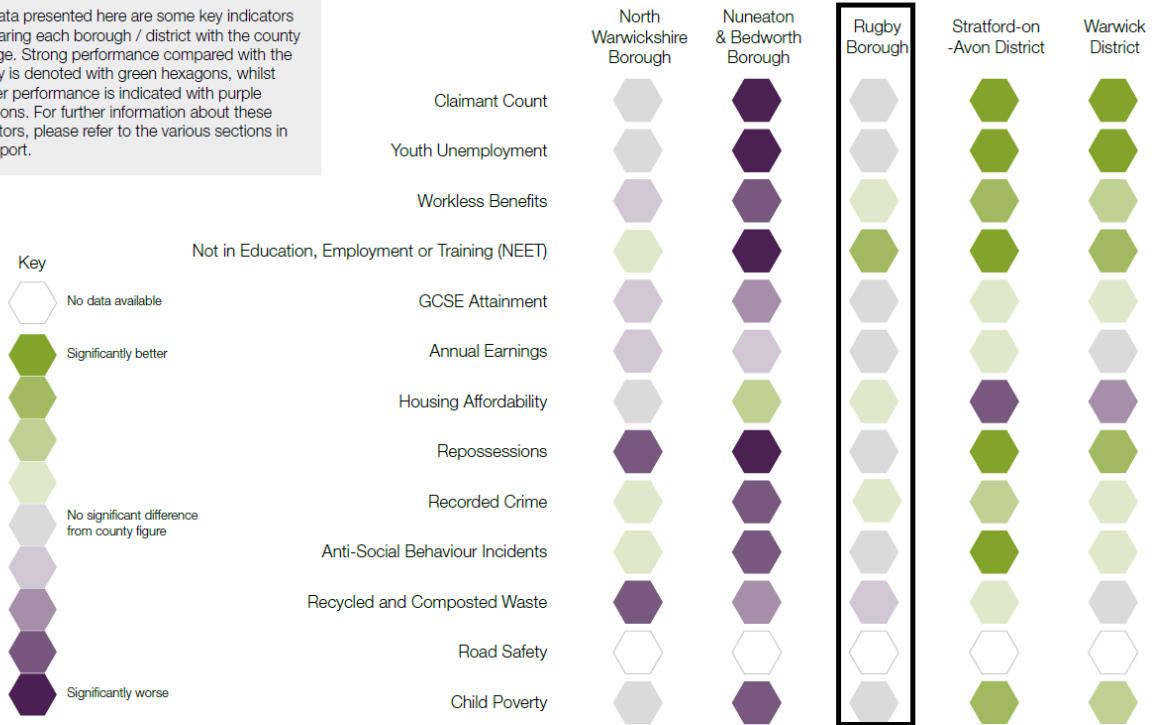
4.2 The report makes clear that the health of people in Warwickshire is generally better than average, which is reflected in life expectancy for both men and women being higher than the England average.

4.3 The report also compared key indicators district by district. This is shown in Figure 2, which compares each borough/district with the county average. On the measures used in Figure 2, Rugby performs broadly the same as the county average, and is not subject to the sharp divergences in performance like Nuneaton. Rugby performs better than the county as a whole on NEET figures, and is also slightly better on measures such as workless benefits and housing affordability.

Figure 2- District Trends

District Trends

The data presented here are some key indicators comparing each borough / district with the county average. Strong performance compared with the county is denoted with green hexagons, whilst weaker performance is indicated with purple hexagons. For further information about these indicators, please refer to the various sections in this report.



Rugby Health

4.4 Life expectancy in the borough for males and females is higher than the Warwickshire and national figures. In 2012-14, life expectancy was 80.5 years for males and 84.1 years for females. This is higher than the figures for Warwickshire (80.1 for males and 83.9 for females) and nationally (79.5 for males and 83.2 for females).

4.5 In 2015 the prevalence of adults smoking within Rugby Borough was 11.9% which is lower than the Warwickshire figure of 12.1% and national figure of 16.9%.

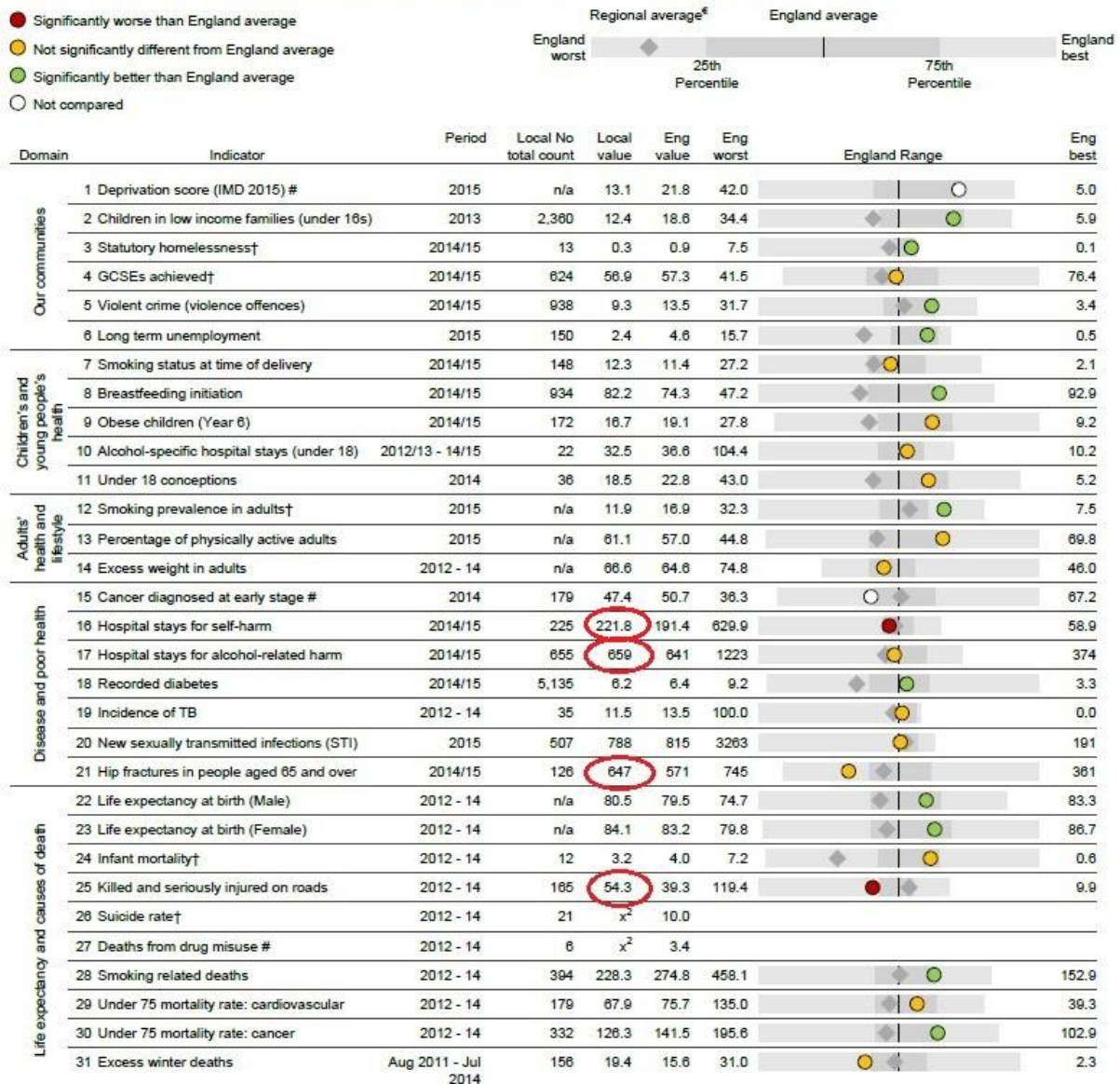
- 4.6 Using older data from 2012 the teenage pregnancy rate in Rugby was lower than the Warwickshire and national rates. The teenage conception rate per 1,000 females aged 15-17 was 20.8 whilst the rate for Warwickshire was 24.3 and the national rate was 27.7.
- 4.7 **Following the launch of the JSNA website** there was considerable interest to provide more localised data and analysis. To address this, a set of 'mini' JSNAs were produced at a District/Borough level. Some of the key findings included:
- In the past eight years, there has been a significant increase in the numbers and rates of alcohol related hospital admissions across the county. In Rugby Borough, there has been an increase of 174% from a rate of 681 per 100,000 of the population in 2002/3 to 1,704 per 100,000 of the population in 2010/11. This is higher than the 142% increase in admissions across the county during the same period.
 - The incidence of cancer in Rugby is 372 cases per 100,000 population which is higher than Warwickshire's 352 per 100,000 population.
 - There is variation in life expectancy at birth, at ward level across the Rugby Borough; someone in the Avon and Swift Ward can expect to live up to the age of 74.8 years while someone born in Paddox Ward can expect to live up to the age of 83.8, a gap of nearly 9 years.
 - Hypertension is the most common long-term condition in Rugby Borough, in terms of both estimated and actual prevalence. Despite this, for most conditions the number of patients on the general practice disease registers for Rugby are lower than expected, highlighting the fact that there are a potentially large number of undiagnosed or unrecorded cases for certain long-term conditions.
- 4.8 The mini JSNA also pulled together indicators from various Public Health Observatories to show areas where the Borough has performed significantly better or worse than England. Sources included: ChiMat profiles¹⁰, Injury Profiles and End of Life Care Profiles. This is shown in Figure 3.

¹⁰ The Child and Maternal Health Observatory. As of April 2013 part of Public Health England.

Figure 3 - Rugby Health Profile

The chart below shows how the health of people in this area compares with the rest of England. This area's result for each indicator is shown as a circle. The average rate for England is shown by the black line, which is always at the centre of the chart. The range of results for all local areas in England is shown as a grey bar. A red circle means that this area is significantly worse than England for that indicator; however, a green circle may still indicate an important public health problem.

- Significantly worse than England average
- Not significantly different from England average
- Significantly better than England average
- Not compared



† Indicator has had methodological changes so is not directly comparable with previously released values. € "Regional" refers to the former government regions.

New indicator for Health Profiles 2016. x2 Value cannot be calculated as number of cases is too small

Source: PHE – Rugby Health Profile 2016

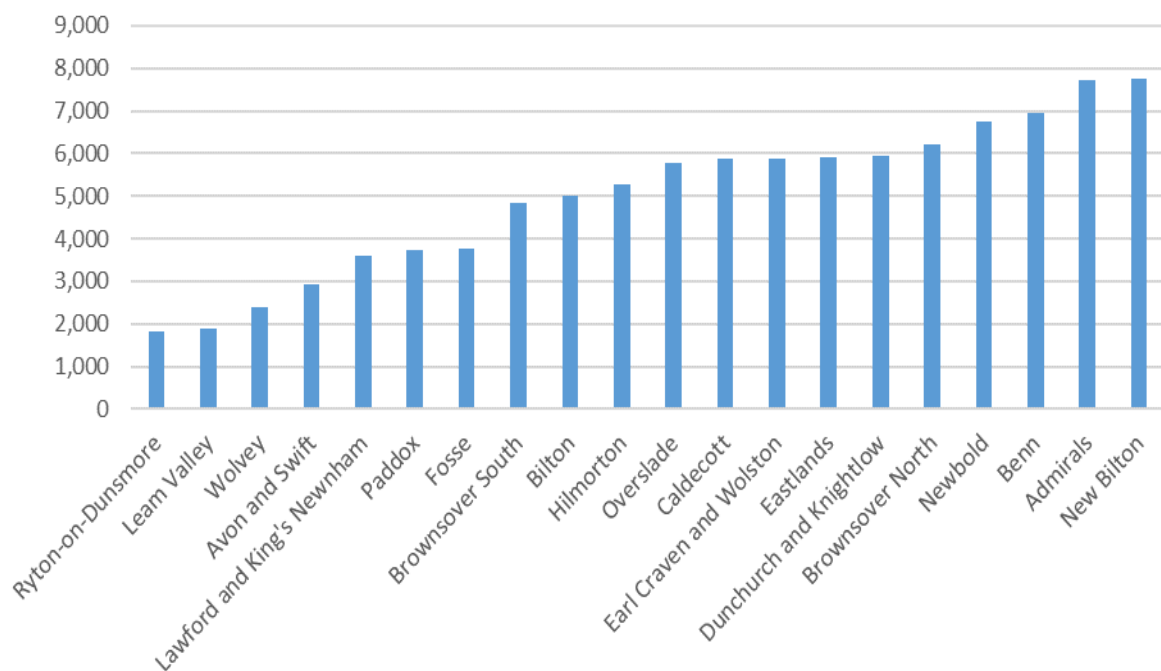
- 4.9 Looking at Figure 3 - from the 2016 PHE profile for Rugby - indicators which are better than the England average are: breastfeeding initiation; smoking related deaths; and the under 75 mortality rate related to cancer.
- 4.10 Whereas, hospital stays for alcohol related harm, hospital stays for self-harm, hip fractures for those aged 65 and over and the number of people killed or seriously injured on roads are worse than the England average. These indicators where Rugby requires improvement are circled on Figure 3.
- 4.11 Furthermore, ONS Census data allows for an analysis of certain metrics by ward level, allowing for a closer examination of the population of Rugby.

- 4.12 According to the 2011 Census, 47,711 Rugby residents (47.7%) reported that they were in 'very good health', with a further 47,886 (47.9%) reporting either 'good health' or 'fair health'. 4,415 residents said that had either bad or very bad health.

Long-term health problem or disability by ward

- 4.13 Census data allows for a breakdown of health data by ward. With regards to the number of residents with a long-term health problem or disability, the ward with the highest concentration is New Bilton (7,760), followed by Admirals (7,726). The ward with the fewest residents with long-term health issues is Ryton-on-Dunsmore (1,813). The figures for residents admitted to hospital with self-harm related injuries is higher than the England average in Rugby. This is an indicator for mental wellbeing, a PHE priority in Rugby. These figures are not broken down to the ward level however.

Figure 4 Long-term health problem or disability by ward (2011)



Source: ONS Census (2011)

The population of Rugby

- 4.14 Rugby boasts a population of 103,400 comprising of 51,500 males and 52,000 females, a near 50/50 split. Of this, 63,500 (61%) are of working age (16-64). The population of Rugby is projected to increase by 30% between 2010 and 2035. This is the largest projected population rise across all the districts and boroughs in Warwickshire.

Figure 5 - Total population. ONS projections

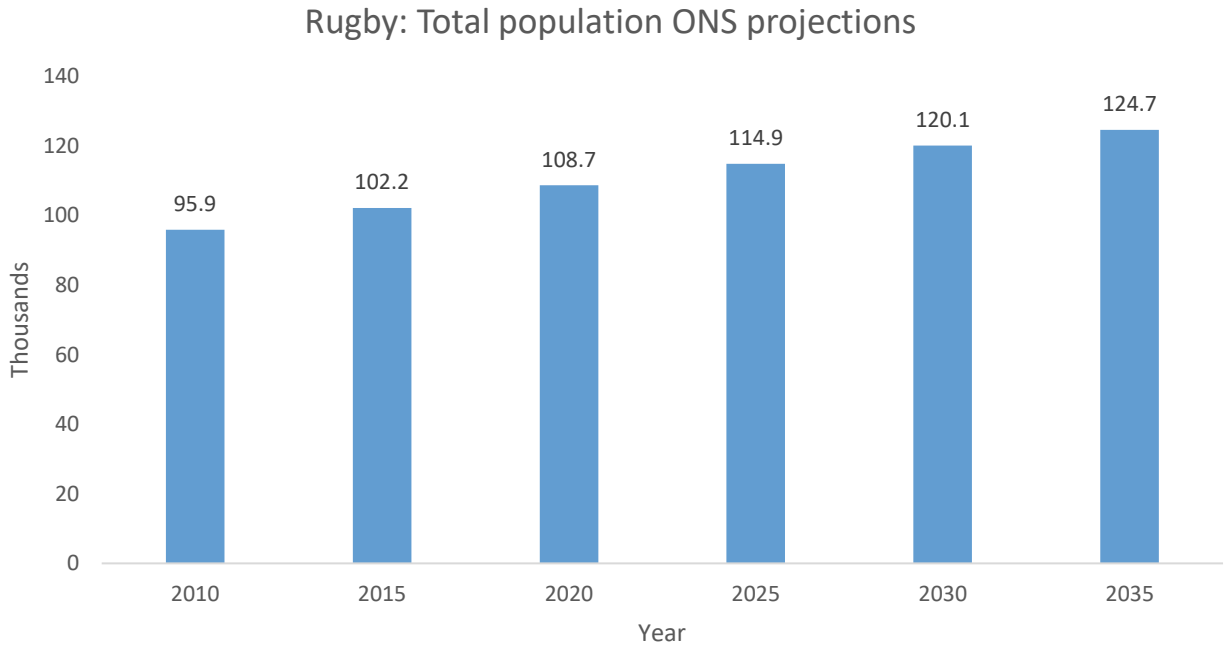
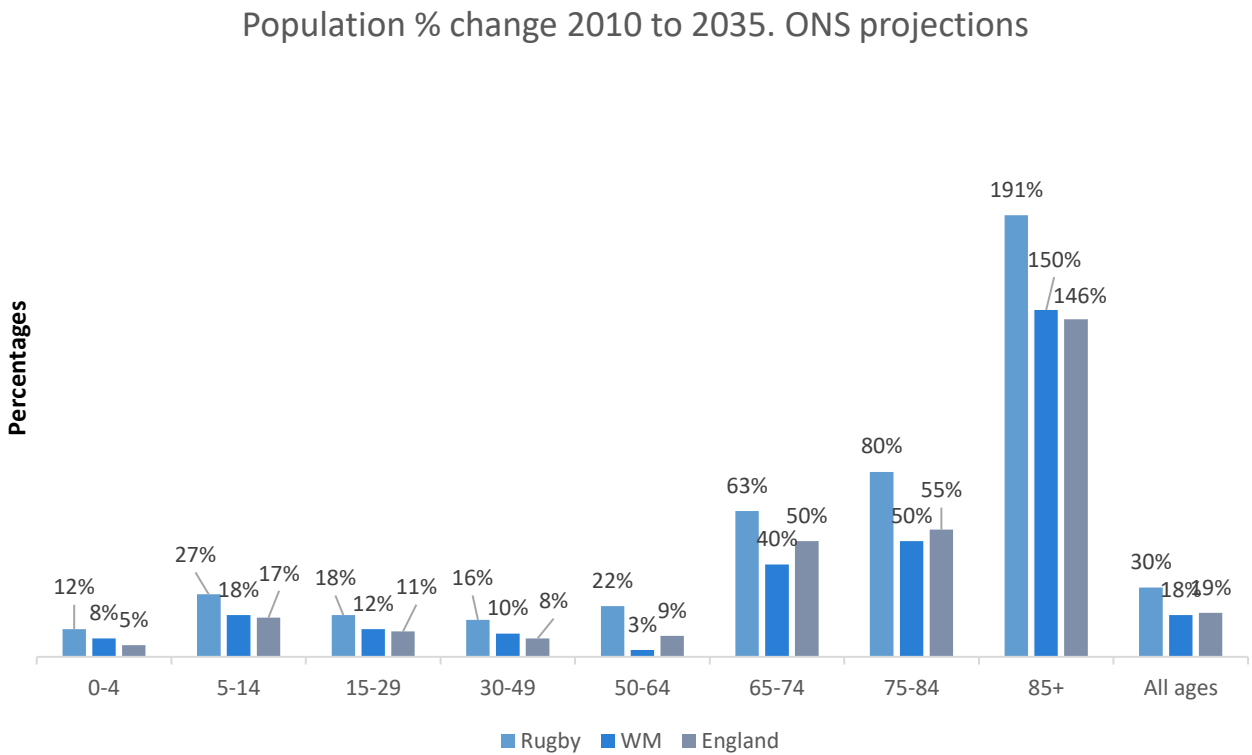


Figure 6 - Population % change by age group, 2010 to 2035



- 4.15 Figure 6 displays population increase by age group compared with the West Midlands and England average. Between 2010 and 2035 a significant increase in older residents is projected for Rugby. The population of those over the age of 85 is set to rise by 191%.

Sport in Rugby

- 4.16 Sport England's Local Sport Profile provides local authorities with a profile of up-to-date data for their local area, covering sports participation, facilities, health, economics and demographics. It is a vital tool for local authorities and other partners working in community sport, which can be used to inform strategic planning and development of sporting opportunities and demonstrate the value of sport to other sectors. Sport England have also produced a literature review which unpacks the effects sport may have on mental wellbeing.¹¹

Excess weight in adults and obesity levels in children

- 4.17 In 2012-14, 66.6% of adults in Rugby were classified as holding excess weight. This was slightly above the Warwickshire rate (65.6%) and the national rate (64.6%). 16.7% of children (year 6) were classed as obese, close to the Warwickshire rate (16.8%) and below the England rate (19.1%).

Premature mortality

- 4.18 Between 2012 and 2014 there were 785 premature deaths¹² in Rugby, a rate of 296.9 per 100,000 of the population. Additionally, according to Public Health England data, there were 66 deaths in Rugby in 2009/10 that would have been preventable if those who died had engaged in recommended levels of exercise, with the assumption being that they had engaged in none at all. On a nationwide scale (England), there were 36,815 such deaths.

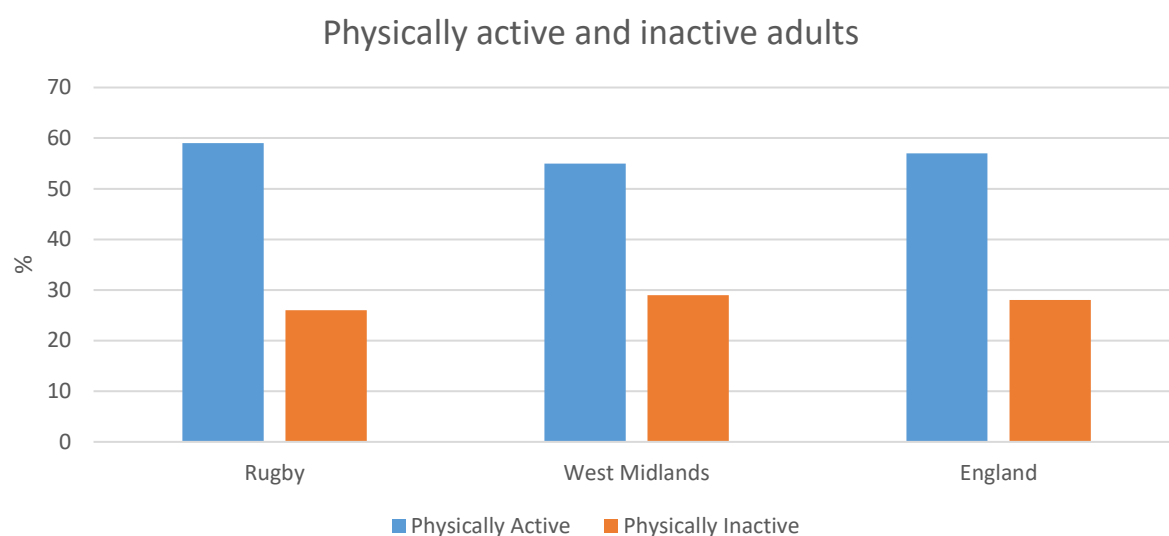
Physical activity amongst adults in Rugby

- 4.19 As Figure 7 shows, adults in Rugby are more active than the West Midlands as a whole and England. In 2014, 59.3% of adults in Rugby were classed as 'active', higher than the West Midlands (55.5%) and England (57%) averages. There were also fewer inactive adults in Rugby (25%) than the West Midlands (29.1%) and England (27.7%).

¹¹ <https://www.sportengland.org/research/resources/the-value-of-sport-monitor/psychological-health/>

¹² A Public Health England report titled 'Living Well for Longer' defines premature death as of people under the age of 75 that could have been prevented through prevention of illness, public health intervention, earlier diagnosis and awareness of symptoms and high quality treatment and care.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/307703/LW4L.pdf

Figure 7 - Physically active and inactive adults in Rugby (2014)



Source: Public Health England - Public Health Outcomes Framework. Measure: percentage of physically active and inactive adults. Time Period(s): 2014

- 4.20 Table 1 displays the number of core sports facilities in Rugby and surrounding authorities that are publicly accessible. There is roughly 1 grass pitch for every thousand people in Rugby which is better than most of Rugby's neighbours. However, Rugby have less publicly accessible sports halls than neighbouring authorities.

Table 1 - Number of publicly accessible core sports facilities per 1000 people in Rugby and neighbouring authorities.

Facilities	Rugby	East Northamptonshire	East Staffordshire	High Peak	Kettering
Grass Pitches	1.12	1.43	0.97	0.86	0.94
Sports Halls	0.14	0.27	0.20	0.25	0.17
Swimming Pool	0.08	0.09	0.11	0.10	0.06
Artificial Grass Pitch	0.09	0.07	0.07	0.08	0.05

Source: Active Places Power and ONS Population estimates

Transport in Rugby

- 4.21 Rugby is near several major trunk routes including the M6, M1 and M45 motorways and the A45. Buses run to Coventry, Southam, Leamington Spa, Daventry, Leicester and Northampton as well as serving the major estates of the town on a regular basis. In addition, Rugby railway station has regular services to London Euston and Birmingham New Street, and a new Rugby Parkway station, on the Northampton Loop Line, is planned to open in 2019. As such, the people of Rugby are well served by roads and public transport.
- 4.22 Warwickshire County Council's Cycling Strategy within the Local Transport Plan 2011-26 focuses on developing cycle networks in the five main towns in the county – including Rugby – and working with

Sustrans to complete the National Cycle Network within Warwickshire. Already, more than 80km of dedicated cycle routes are now provided within the five main towns. New routes are prioritised to increase levels of cycling in general, but many routes are particularly useful for journeys to school. The long-term aim is to provide a network of connected routes which make cycling a viable and attractive choice for local journeys to work, school, the shops and other key locations.

- 4.23 According to 2011 census data, 64.4% of workers in Rugby travelled to work via car, with 20.4% travelling via 'other methods' which include motorcycle, taxi, bicycle and on foot. In Warwickshire, 64.5% used their car to get into work, whilst the rate for England was 53.9%. Encouraging cycling and walking, where practical, boosts physical activity and is also good for the environment, which can have knock-on health benefits relating to issues such as air quality.

Employment, unemployment and benefits

- 4.24 Rugby's employment rate has risen sharply since 2010, with a rate of 84.1% in 2015, up 12.8 percentage points on 2010. By comparison, the employment rate in the West Midlands in the same period rose only 3 percentage points to 70.6% in 2015, with the rate in England was 73.8%.

Employment by business sector

- 4.25 Looking at employees by industrial sector, as the table below shows, Rugby has relatively high rates of employment in construction (3,100 jobs), as well as transport and storage (4,700 jobs). 41.8% of jobs in Rugby are in financial services and public administration.
- 4.26 Although it is only possible to speculate on health outcomes for workers based on these figures, it does appear that Rugby has an average proportion of workers not in traditional, sedentary desk-based jobs. 16.9% of jobs in Rugby are in manufacturing and construction which is identical to the England average, jobs which would be expected to be more active than the 1,300-people working in information and communication.

Table 2 - Employee jobs (2014)

Employment type/sector	Rugby		Warwickshire	England
	No.	%	%	%
Total Employee Jobs	44,000	-	-	-
Full-time	30,500	69.3	69.0	68.5
Part-time	13,500	30.7	31.0	31.5
Employee Jobs by Industry				
Primary sector & utilities	200	0.6	2.0	1.7
Manufacturing	4,400	9.9	11.8	8.3
Construction	3,100	7.0	4.7	4.3
Motor trades	1,100	2.6	3.2	1.8
Wholesale & retail	6,000	13.6	15.0	14.1
Transport & storage	4,700	10.8	7.6	4.6
Accommodation & food	3,300	7.6	6.9	7.0
Information & communication	1,300	2.9	3.9	4.3
Financial & other business services	9,000	20.4	18.4	22.8
Public admin; Education; Health	9,400	21.4	21.3	26.5
Other services	1,400	3.3	5.1	4.4

Source: ONS BRES

- 4.27 Unemployment has also fallen in Rugby, with the area boasting virtually full employment. Unemployment fell from 8.8% in 2010 to 2.6% in 2015. In contrast, unemployment in the West Midlands was 6% in 2015, and 5.3% in England.
- 4.28 Looking at out-of-work benefits, Rugby has a lower percentage of out-of-work benefit claimants than both the West Midlands and England average. In November 2015, 5.8% of 16-64 year olds were claiming out-of-work benefits in Rugby compared to 10% for the West Midlands and 8.7% for England as a whole.
- 4.29 As Table 3 shows, ESA and Incapacity Benefit claimants account for the largest share of those on out-of-working benefits in Rugby. However, at 4.3% of 16-64 year olds, the rate of ESA/IB claimants is below the England average (6.0%).

Table 3 - Working-age client group - main benefit claimants (August 2015)

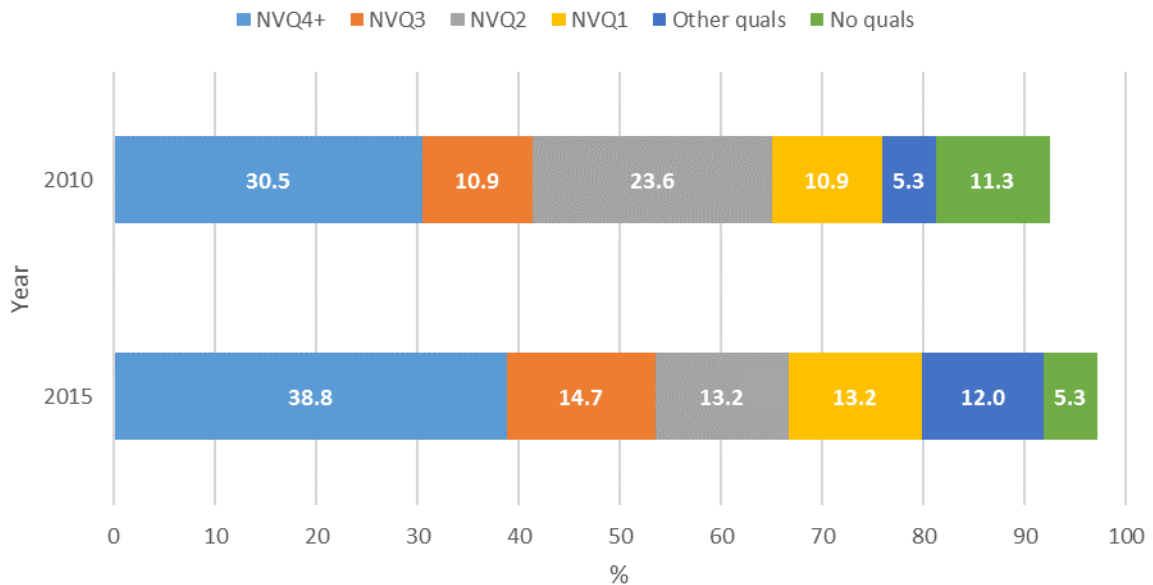
		Rugby	West Midlands	England
	No.	%	%	%
Total Claimants	5,040	8.0%	13.0%	11.4%
Job seeker	350	0.6%	1.8%	1.4%
ESA and incapacity benefits	2,680	4.3%	6.6%	6.0%
Lone parent	520	0.8%	1.3%	1.1%
Carer	730	1.2%	1.9%	1.6%
Others on income related benefit	120	0.2%	0.3%	0.2%
Disabled	520	0.8%	0.9%	1.0%
Bereaved	120	0.2%	0.2%	0.2%
Main out-of-work benefits	16,170	5.8%	10.0%	8.7%

Source: DWP Benefit Claimants – working age client group. Main out-of-work benefits includes the groups: job seekers, ESA and incapacity benefits, lone parents and others on income related benefits. % is a proportion of resident population of the area aged 16-64.

Qualifications

- 4.30 One of the key factors in relation to labour market performance is qualifications. Between 2010 and 2015, the number of 16-64 year olds with some form of qualifications (NVQ) increased by 14%. Figure 8 shows that, in 2015, 38.8% of working-age residents in Rugby are qualified to NVQ Level 4+ (degree and higher). This was an increase from 30.5% in 2010. There is also a low and substantially reduced number of working age residents with no qualifications (11.3% in 2010 and 5.3% in 2015).

Figure 8 - Highest level of attainment by qualification level in Rugby (% of residents aged 16-64, 2010 and 2015)



Source: ONS APS

4.31 Therefore, the economic fundamentals of the Rugby economy are strong. Rugby outperforms the West Midlands and England on a range of metrics. Employment is substantially higher; unemployment is below 3% and the proportion of out-of-work benefits claimants is low. Additionally, Rugby's residents are becoming increasingly skilled with relation to qualification attainment. The number of working age residents without any qualifications has more than halved and the number of residents educated to NVQ Level 4 and above has increased by 27% between 2010 and 2015.

Summary

4.32 Aspects of the population profile that are material to the creation of an HIA:

- The 2016 PHE profile for Rugby identified three priority areas these are: addressing drugs and alcohol, mental wellbeing and tackling obesity.
- The Warwickshire JSNA priorities are: vulnerable young people; mental wellbeing; long-term conditions; physical wellbeing; and carers.
- Life expectancy in Rugby is 80.5 years for males and 84.1 years for females, higher than the figures for Warwickshire and England.
- 66.6% of adults in Rugby are classed as holding excess weight. Moreover, 16.7% of children (year 6) were classed as obese.
- Figures for hospital admissions related to self-harm and alcohol are higher than the England average.
- Adults in Rugby are more active than the West Midlands and England. 59.3% of adults are classed as 'active' with 25% of adults classed as 'inactive'.
- Potentially significant amount of jobs in that are not 'traditional, desk-based' jobs.

5 Health Impacts and Recommendations

- 5.1 In reviewing the Local Plan and in speaking to the LEF and the LSP we are making two sets of recommendations. The first and largest set of recommendations relates directly to policy in the local plan. In addition, we have also included a section with impacts and recommendations outside of the scope of the local plan which should be considered by public health agents and other related stakeholders in Rugby.
- 5.2 The impacts and recommendations are drawn from the policy matrix which assesses each policy in the local plan against a set of five health determinants. This can be found in appendix 1. The health determinants used to assess health impact of policy in the policy matrix are included in Table 4 below.

Table 4 - Health Determinants

<p>Lifestyle and wellbeing, including: mental health, drug, tobacco and alcohol misuse, diet and nutrition, obesity, exercise and physical activity.</p>	<p>Economic and social wellbeing including: employment, adequate housing, social network/support, social cohesion, social infrastructure including schools, healthcare and community facilities.</p>	<p>Environment including, physical safety, air quality, accessibility for disabled residents, safety for older and vulnerable residents and crime.</p>	<p>Access to services and amenities including: healthcare, children's education, social services, healthy food shopping, leisure and sports facilities, green spaces.</p>	<p>Transport: how accessible and active?</p>
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Health Impacts and Recommendations for the Local Plan

- 5.3 The local plan is structured according to policy area with individual policies falling under their area of influence. In this section health impact headlines have been taken from the local plan where it was felt that greater attention could be given to the effect it may have on health and health related impact. A recommendation is included below each impact.

General Principles

- Policy GP1 - Securing Sustainable Development
- Policy GP2 - Settlement Hierarchy
- Policy GP3 - Previously Developed Land and Conversions
- Policy GP4 - Safeguarding Development Proposal
- Policy GP5 - Parish or Neighbourhood level documents

- 5.4 **Impact:** Obesity, mental health and alcohol consumption are identified by PHE as priority issues in Rugby. Policy GP1 states an intention to work proactively with applicants to gain planning approval. If this policy enabled approval of businesses offering unhealthy food or promoting binge or excessive

drinking it would fall short of addressing levels of obesity and alcohol misuse in Rugby, two priority issues for Rugby identified by PHE.

Recommendation: Development involving businesses offering unhealthy food choices such as hot food takeaways or bars which encourage vertical drinking should be restricted. The good practice guide on controlling hot food takeaways by HUDU¹³ details how policy can be used to mitigate the effect of hot food takeaways which sell unhealthy food.

5.5 **Impact:** A study from 2008¹⁴ highlighted the risk posed by “fringe shops” offering child friendly prices on sweets and other unhealthy options.

Recommendation: Because children are “price-sensitive” customers, shops selling cheap sweets and fizzy drinks will be appealing. Planning decisions should be cognisant of this and strive to limit the number of such shops in close proximity to schools.

5.6 **Impact:** The number of people killed or seriously injured on the roads in Rugby is worse than the national average. Currently the Local Plan does not address the danger posed by cars or offer adequate solutions for mitigation.

Recommendation: Road design should improve safety with traffic calming infrastructure including road humps and road narrowing. The speed limit in retail and residential areas should be set at 20 mph.¹⁵ The London Borough of Hackney has promoted the concept of “Play Streets” which are temporary street closures so that children can play safely on roads.¹⁶

Development Strategy

- Policy DS1 - Overall Development Needs
- Policy DS2 - Sites for Gypsy, Travellers and Travelling Showpeople
- Policy DS3 - Residential Allocations
- Policy DS4 - Employment Allocations
- Policy DS5 - Comprehensive Development of Strategic Sites
- Policy DS6 - Rural Allocations
- Policy DS7 - Coton Park East
- Policy DS8 - South West Rugby
- Policy DS9 - South West Rugby Spine Road North Western Alignment
- Policy DS10 - Lodge Farm

5.7 **Impact:** If housing and employment land is situated close to services and amenities, linked by public transport, daily tasks will be achievable without the need for a private motor car.

Recommendation: Policies DS1 and DS3 describe housing allocation in future developments which prioritise Rugby Town, the most central location for access to services and businesses. However, currently the two largest planned housing developments are the Rugby Radio

¹³ <http://www.healthyrbandevelopment.nhs.uk/wp-content/uploads/2013/12/HUDU-Control-of-Hot-Food-Takeaways-Feb-2013-Final.pdf>

¹⁴ http://www.fhf.org.uk/meetings/2008-07-08_School_Fringe.pdf

¹⁵ A review of 20mph zones and traffic calming concluded that they were effective means of improving public health. <http://jpubhealth.oxfordjournals.org/content/early/2014/09/28/pubmed.fdu067.abstract>

¹⁶ <http://www.hackneyplay.org/playstreets/home/>

Station (Houlton) site and South West Rugby site, neither of which are centrally located. It will be important that frequent and reliable bus links are up and running as soon as people move into these sites and essential services and amenities are accessible and appropriate.

- 5.8 **Impact:** ONS forecasts predict the greatest population increase in Rugby between 2010 and 2035 for those over age 65. New housing development designed with older and disabled residents in mind would make them safer and more accessible for older people.

Recommendation: Policies DS1 and DS3 refer to residential allocations. Short, local journeys by private motor car could be reduced by offering active transportation alternatives which makes leaving the car at home possible. If older or vulnerable residents are to feel independent whilst leaving their cars at home, alternatives will need to be safe and reliable. The most likely form of transport which could achieve this in Rugby are frequent and reliable buses or other transportation schemes, such as Total Transport, which also promote more social aspects of travel. Strategies which would fall out of scope of the Local Plan such as community transport and car-sharing should be promoted in addition to a well-linked and frequent bus service and these strategies are covered under Health Impacts and Recommendations out of scope of the Local Plan.

Housing

- Policy H1 - Informing Housing Mix
- Policy H2 - Affordable Housing Provision
- Policy H3 - Housing for rural businesses
- Policy H4 - Rural Exception Sites
- Policy H5 - Replacement Dwellings
- Policy H6 - Specialist Housing

- 5.9 **Impact:** Policy H4 states that affordable housing (majority social tenure) could, given a lack of other options, be allocated in rural exception sites. Such development would likely house those on low incomes or working age benefits with greater health needs in an environment which is more likely to be detrimental to their health and wellbeing due in part to isolation. Isolation and unemployment would have direct implications for the mental wellbeing of residents in such settlements.

Recommendation: If rurally sited social housing is to be built, developers should prove that the housing will be serving those who work in local, rural jobs to justify it. Otherwise good public transportation would be required to link residents to employment and services.

Impact: Green space for residential allocations is covered in Policy HS4 (Healthy, Safe and Inclusive communities). The policy describes the council's open space standards -including green space and play areas - which shall be applied to new dwellings. Such a policy is positive for health and the government has written a paper on strategies to encourage access to green space.¹⁷

¹⁷

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/355792/Briefing8_Green_spaces_health_inequalities.pdf

Economic Development

- Policy ED1 - Protection of Rugby's Employment Land
- Policy ED2 - Employment development within Rugby Urban Area
- Policy ED3 - Employment development outside Rugby urban area
- Policy ED4 - The Wider Urban and Rural Economy

5.10 **Impact:** Mental wellbeing is a priority issue identified by PHE and rates of self-harm related hospital admission are higher than average in Rugby. Policies ED1 and ED2 describe protection of existing employment land and encouragement of new development. The Warwickshire JSNA identifies employment as a key factor in improving mental health.

Recommendation: Protecting and encouraging employment in Rugby will have positive impact for mental health. During consultation members of the LEF highlighted new workforces moving to Rugby with their own health needs. For example, recent migrants from Europe have moved to Rugby to work in distribution and warehouse work. If a population profile were integrated into planning for healthcare facilities, it was felt, by members of the LEF, that such facilities would be more suitable.

5.11 **Impact:** Most proposed employment land will be use class B8: storage and distribution. Such development is less suited to centralisation and is more suited to the outskirts of town, making motor vehicle use more likely for commuting. Development which is reliant on fossil fuels and private motor vehicle use can impact negatively on health in multiple ways, most directly air and water quality.

Recommendation: Strategies for workers to get to the city's edge without the need for private motor vehicle should be devised. This should include sustainable modes such as frequent and reliable bus routes and dedicated cycle lanes. Those who use the bus will be likely to walk at least part of their journey, whilst those who cycle will be undertaking an intrinsically healthy commute.

Retail and Town Centre

- Policy TC1 - Development in Rugby Town Centre
- Policy TC2 - Rugby Town Centre Comparison and Convenience Floorspace Requirements
- Policy TC3 - Directing Development in the Town Centre
- Policy TC4 - Primary Shopping Area and Shopping Frontages

5.12 **Impact:** Obesity is a priority health issue identified by PHE for Rugby. Policy TC2 states that new retail floor space for food will more than double between 2020 and 2030. The Warwickshire Joint Health and Wellbeing Strategy suggests development of policy to limit fast food outlets which should apply to new retail space.

Recommendation: New food retailers which sell healthy options should be prioritised. A5 use establishments which sell unhealthy fast food should be restricted (see HUDU guidance on restricting Hot Food Takeaways¹⁸). Supermarkets and other food retailers should be encouraged to provide affordable healthy food.

¹⁸ <http://www.healthyrbanddevelopment.nhs.uk/wp-content/uploads/2013/12/HUDU-Control-of-Hot-Food-Takeaways-Feb-2013-Final.pdf>

5.13 **Impact:** Alcohol and drug misuse is a priority issue highlighted by PHE in Rugby. Binge or habitual drinking may be encouraged if new developments include a high proportion of bars and off licences. Drinkaware have produced guidance on what impact excessive alcohol consumption can have on mental health.¹⁹

5.14 **Recommendation:** Businesses encouraging unhealthy drinking including off licences and bars which encourage vertical drinking should be restricted. Though drinking establishments cannot be regulated directly to meet public health objectives The Licensing Act (2003) states that establishments can be regulated for prevention of crime and disorder, prevention of public nuisance, public safety and protection of children from harm. If areas have a high proliferation of off-licences and a high-prevalence of anti-social behaviour or unhealthy drinking, a Designated Public Places Order (DPPO) could be used to ban street drinking. A DPPO could also be used to restrict drinking close to schools and hospitals.

Healthy, Safe and Inclusive Communities

- Policy HS1 - Healthy, Safe and Inclusive Communities
- Policy HS2 - Health Impact Assessments
- Policy HS3 - Protection and Provision of Local Shops, Community Facilities and Services
- Policy HS4 - Open Space and Recreation
- Policy HS5 - Traffic Generation and Air Quality

5.15 **Impact:** The number of people killed or seriously injured on the roads in Rugby is worse than the national average. The local plan does not indicate any clear strategies to overcome this.

Recommendation: Policy HS1 lists promotion of healthy and safe places, though there is nothing explicit about road safety. Road design should improve safety with traffic calming infrastructure including road humps and narrowing and the speed limit in retail and residential areas should be set at 20 mph.

Natural Environment

- Policy NE1 - Protecting Designated Biodiversity and Geodiversity Assets
- Policy NE2 – Biodiversity
- Policy NE3 - Blue and Green Infrastructure
- Policy NE4 - Landscape Protection and Enhancement

5.16 **Impact:** Green space can have a positive impact on one's mental wellbeing.²⁰ Mental wellbeing is priority health issue for Rugby and Warwickshire.

Recommendation: Policies NE1 - NE4 assert the importance of protecting and enhancing the physical natural environment in Rugby. Justification for this can be boosted by acknowledging the positive impact activities in parks and green spaces can have on one's mental wellbeing. WCC's Green Space Priorities²¹ for Warwickshire document makes the case for this and highlights the idea that positive therapeutic impacts on anxiety and depression gained from

¹⁹ <https://www.drinkaware.co.uk/alcohol-facts/health-effects-of-alcohol/mental-health/alcohol-and-mental-health/>

²⁰ <https://www.ncbi.nlm.nih.gov/pubmed/23613211>

²¹ <https://apps.warwickshire.gov.uk/api/documents/WCCC-630-573>

greater access to green space may have a cost saving benefit for public budgets which allocate care and medicine for those with mental ill health.

Sustainable Design

- Policy SDC1 - Sustainable Design
- Policy SDC2 – Landscaping
- Policy SDC3 - Protecting and enhancing the historic environment
- Policy SDC4 - Sustainable Buildings
- Policy SDC5 - Flood Risk Management
- Policy SDC6 - Sustainable Urban Drainage
- Policy SDC7 - Protection of the Water Environment and Water Supply
- Policy SDC8 - Supporting the provision of renewable energy and low carbon technology
- Policy SDC9 - Broadband and mobile internet

5.17 **Impact:** The effects of construction such as noise, vibration, dust and odours should be minimised, especially on big development projects which can take years to complete. Mitigation of the effects of construction is not addressed in policies GP1-GP5.

Recommendation: HS2 have produced a Draft Code of Construction Practice²² document for phase one of the project. The document asserts how sites should be monitored for dust, exhaust emissions, noise and vibration. Monitoring instruments should be used to track levels of disturbance and equipment. Extractor fans or shielding should be installed on sites to limit dust and air pollution.

5.18 **Impact:** Policy SDC1 asserts that the council will consider the density of housing on a site by site basis. Given that preference for central development is likely to lead to higher density housing, storage for bicycles may be difficult for those who will live in low density flats.

Recommendation: Secure on street or communal bicycle parking should be provided for those residents in flats. Commuting is a daily and essential habit. If dependence on the private motor car to commute is to be addressed then new habits must be attractive, viable and easy to transition to.

Delivery

- Policy D1 – Transport
- Policy D2 - Parking Facilities
- Policy D3 - Infrastructure and implementation
- Policy D4 - Planning Obligations
- Policy D5 - Airport flightpath safeguarding

5.19 **Impact:** Healthcare facilities should be adequate and appropriate. In consultation, members of the LEF felt that the response to estates needs can often be more “topographical than financial”. Without

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/259617/Vol5_draft_code_of_construction_practice_CT-003-000.pdf

dialogue with healthcare commissioners and providers land allocation for healthcare facilities may be allocated but never developed.

Recommendation: Provision of land for healthcare should be twinned with engagement of healthcare providers to manage care for a new development. Without this involvement from healthcare providers there is a danger that the land will be allocated but no healthcare provider will occupy it.

Health Impacts and Recommendations out of scope of the Local Plan

5.20 In delivering the HIA matrix and consultation, a number of findings and recommendations falling outside the scope of the local plan became apparent. These issues and recommendations have been included in this report to support the wider requirement to consider health daily. Public health officers as well as Voluntary and Community Sector (VCS) stakeholders can play a part in realising these recommendations.

5.21 **Impact:** Access to green space means people will better able to play sports or keep active. Green space can also have more holistic effects on mental wellbeing.

Recommendation: Green space can feel unsafe when it is neglected and underused. Community ownership of green space by schools or VCS organisations through food-growing and gardening schemes can improve the function and safety of green space. Care should be taken that schemes using public green space do not give people in Rugby the perception that green spaces are restricted to certain members of the community.

5.22 **Impact:** Housing which is safe and be easily accessible to services and amenities will increase the likelihood that older people are independent and mobile. ONS population forecasts for Rugby predict the greatest population increase for those over age 65 between 2010 and 2035.

Recommendation: Community transportation may expand transport options for those with specific requirements. Because isolation can be an issue for older people directly related to their circumstances, such services would include the opportunity for socialising. Socialising events and opportunities should be accessible and community run transport services could be encouraged to run services where the council does not.

5.23 **Impact:** Involvement of healthcare providers and commissioners at an early stage in any planning or development process will lead to better decisions about the requirement and function of healthcare facilities.

Recommendation: The creation of a LEF subgroup to discuss planning issues and pursue more health-minded section 106 and CIL agreements.

5.24 **Impact:** Development which is central and/or close to active transportation options is likely to encourage walking and cycling and should be prioritised. 64 per cent of commutes in Rugby are by private motor vehicle which is likely due in part to the way the built environment is designed, as well as the fact that many travel beyond Rugby to get to work.

Recommendation: Local services should be available in new and existing hubs to obviate the danger that private car use to the town centre is the only option. RBC should continue to liaise

proactively with WCC highways and transport colleagues to ensure local bus routes are adequate. If developments are less close to services and amenities and bus services are slow to respond to new populations, it is less likely that residents will embed walking and public transport use into their daily routine.

5.25 Impact: Consultation with the LSP revealed that many in Rugby felt a poor bus service was an impact on isolation for older residents who were likely to stay at home for non-essential journeys.

Recommendation: In addition to a better bus service community transport schemes and car sharing or voluntary car schemes should be promoted where bus services do not meet all community requirements. Such strategies are out of scope of the local plan but if they were expanded in addition to a good bus service they could improve the likelihood that older and vulnerable residents lead more social lives.

6 Conclusions and Recommendations

6.1 The local plan takes a broadly positive approach to health and wellbeing. The dynamic of this report is to constructively highlight those areas which would be enhanced if a greater level of attention were paid to health. Below are conclusions and recommendations based on readings of the plan:

- A preference for development in Rugby Town Centre and within existing rural boundaries is positive for health. People will be better able to lead active and healthy lifestyles if they live close - within walking distance - to healthy food options, healthcare facilities and sports facilities. Simply put, if people live miles away from services and amenities and are reliant on their car to access them their lifestyles will be more sedentary.
- Provision of key services and businesses should be accessible to all via a frequent and reliable public transport service. Protected cycle lanes will strongly enhance the prospect that people of all ages will cycle to town or to local hubs. The Neighbourhood Development Planning for Health document by Warwickshire County Council promotes neighbourhood design where all basic amenities can be reached with a five-minute walk.
- Private car use has a multitude of negative health impacts for those living and working in Rugby. It encourages sedentary lifestyles, impacts on air quality and most directly impacts on the number of road incidents. To improve this scenario, walkable neighbourhoods - as characterised in WCC's Neighbourhood Planning for Health document - frequent and reliable buses, protected cycle lanes and a 20mph speed limit in residential and commercial areas should be promoted. Currently the Local Plan does not make explicit any of these areas.
- During consultation members of the Coventry and Rugby LEF felt that land in new settlements risked being allocated without healthcare provider input relating to required public services. When working with developers to plan new settlements, healthcare providers and commissioners should be engaged from the start to ensure that health infrastructure needs are considered.
- Members of the LEF felt that healthcare facilities did not always meet the requirements of the communities in which they are placed. Health inequalities between least and most deprived wards in Rugby are pronounced. New and refurbished healthcare facilities will be more adequate and appropriate if healthcare providers are involved from the start.
- The population of Rugby is projected to increase most among older age groups. Developments should be designed with older and disabled people in mind in order to encourage mobility and independence. This would align with the first priority in the current Warwickshire Health and Wellbeing Strategy which is 'Promoting independence for all'.
- The Local Plan should strive to achieve restriction of hot food takeaways²³, and bars and off licences²⁴ which encourage excessive drinking, as research shows there is a link between excessive drinking and poor mental and physical health and wellbeing

²³ Health Impact Assessment – Nuneaton and Bedworth Borough Local Plan (Ben Cave Associates, 2014 p. 41)

²⁴ [Relationship with physical health and healthy lifestyles](#) (Faculty of Public Health, c.2013)

outcomes. Greater consideration should also be given to strategies and allocation of businesses which encourage healthier food options. This would address three health priorities identified by PHE for Rugby: Obesity, mental health and alcohol consumption.

- The development hierarchy in the Local Plan favours development in the centre of Rugby. Currently the two largest residential developments proposed for Rugby (Radio Station and South West Rugby) are not planned centrally. Travel and commute habits from these new settlements to central Rugby where the majority of residents work will be undertaken by private car unless frequent and reliable buses and protected cycle routes are established as soon as locations are populated.
- The local plan is a relatively broad document and it is recommended that HIAs are undertaken on Supplementary Planning Documents to ensure that recommendations and findings from this report are applied when individual sites are developed.

Appendix 1

Policy Matrix

- 6.2 The local plan contains eight policy categories with salient policies contained within. The purpose of the policy matrix is to assess what impact policies in the local plan will have on the health and wellbeing of people in Rugby. Where policies impact, they are specifically discussed.
- 6.3 To assess policy systematically and comprehensively a set of five health and wellbeing determinants were drawn up and policies were assessed against each of these determinants. The determinants were configured using Dahlgren and Whitehead's Determinants of Health model and from reading of documents on HIA and on planning and health. Because transport has such a significant impact on a number of factors including accessibility (employment, healthcare, green space), obesity and air quality, a single determinant was included for active transport, which is walking, cycling and public transport.
- 6.4 To read the matrix you will find policies running vertically along the left column and health and wellbeing criteria on the top row. Each box was populated through cross tabulation of policy and health determinant. In bold policy context is provided and policy impact is provided beneath. Where significant health risk may be present this is highlighted. The full policies from the local plan are included in appendix 3.

Rugby Borough Local Plan - Health Impact Assessment: Policy Matrix

Policy Summaries		Lifestyle and wellbeing, including: mental health, drug, tobacco and alcohol misuse, diet and nutrition, obesity, exercise and physical activity.	Economic and social wellbeing including: employment, adequate housing, social network/support, social cohesion, social infrastructure including schools, healthcare and community facilities	Environment including, physical safety, air quality, accessibility for disabled residents, safety for older and vulnerable residents and crime	Access to services and amenities including: healthcare, children's education, social services, healthy food shopping, leisure and sports facilities, green spaces	Transport: how accessible and active?
<p>Policy GP1 - Securing Sustainable Development</p> <p>The council will favour development which is sustainable and will be approved without delay unless material considerations indicate otherwise.</p>	<p>General Principles</p>	<p>Health Risk</p> <p>Obesity and alcohol consumption are identified by PHE as priority issues in Rugby. Businesses offering unhealthy food choices such as hot food takeaways or bars which encourage vertical drinking should be restricted. The good practice guide on controlling hot food takeaways by HUDU (6-) details how policy can be used to mitigate the effect of hot food takeaways which sell unhealthy food.</p>	<p>The NPPF states that development plans should not undermine community cohesion. Development which promotes healthy and cohesive communities should be maximised. Policies GP1 - GP5 do not specifically outline how community cohesion would be protected from and strengthened by development. The HUDU Rapid HIA Tool (3) highlights Lifetime Neighbourhoods principals (25-) which should seek to help foster neighbourhoods</p>	<p>Residents should have access to green space. This should entail both provision of green space and its upkeep to ensure that green space is safe and feels safe. Green space can feel unsafe when it is neglected and underused. Community ownership of green space by schools or VCS organisations through food-growing and gardening schemes can improve the function and safety of green space. Care should be taken that schemes using public green space do not affect</p>	<p>Before planning permission is granted for large developments an understanding of what impact development may have for provision of healthcare should be integrated into plan making and in section 106 and CIL agreements. This would be strengthened if healthcare providers such as the CCG was involved early in negotiations of section 106 and CIL. An NPPF guided preference to approve sustainable</p>	<p>Health Risk</p> <p>Development which is central and/or close to active transportation options is likely to encourage walking and cycling and should be prioritised. 64 per cent of commutes in Rugby are by private motor vehicle which is likely due in part to the way the built environment is designed as well as the fact that many travel beyond Rugby to get to work.</p> <p>Policy GP2 which focuses development in Rugby Town closer to</p>

<p>Policy GP2 - Settlement Hierarchy. Development will be favoured centrally with Rugby Town preferred option for new development.</p>		<p>Policy GP1 states an intention to work proactively with applicants to gain planning approval. Where this policy would mean approval of businesses offering unhealthy food or promoting binge or excessive drinking it would fall short of addressing levels of obesity and alcohol misuse in Rugby. These are two of the three</p>	<p>inclusive of all residents regardless of age or disability. Such neighbourhoods would encourage participation and interaction of residents and be safe for all. WCC's document on <i>Neighbourhood Development Planning for Health</i> uses the 12 principles of Building for Life which set forth how planning decisions can impact on health. Decisions devolved to</p>	<p>the perception that green spaces are for all. In New Bilton an edible garden and healthy cooking schemes are up and running.</p> <p>Clean air is a major public health issue and is directly affected by planning and transportation policy. Policy GP1 and GP3 are guided by the NPPF which favours sustainable development and</p>	<p>development may speed up planning and development but if done hastily healthcare provision may be poorly planned. An understanding of what healthcare facilities are required (primary, secondary, community care) must be inter-written in the planning process and healthcare providers should be engaged early on so that healthcare</p>	<p>existing services should make active transport options more convenient. However, the two largest residential allocations are planned for the town's edge. These may prove unsustainable if frequent and reliable bus routes are not immediately available. Though provision of bus routes is outside of the scope of the local plan it is recommended that</p>
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<p>Policy GP3 - Previously Developed Land and Conversions. Redevelopment of existing development will be supported subject to conditions.</p>		<p>priority issues for Rugby identified by PHE.</p> <p>Health Risk</p> <p>Approval of businesses close to schools which sell unhealthy food and which specifically target children should be restricted. Just as development which offers unhealthy food choices to adults should be restricted so should those which will impact on the health of children. Sinclair and Winkler (14-) conducted a study which showed that it was not only fast food takeaways which posed this threat, but also small shops on the</p>	<p>neighbourhoods and parishes (covered by policy GP5) may not directly address proposals in the Lifetime Neighbourhoods report and Building for Life guidance but the concept of neighbourhood planning stems from spatial planning principles which acknowledge that more successful design of the built environment is likely when communities are consulted and involved in the process. In effect residents could highlight local issues which may interlock with the principles of Lifetime Neighbourhoods and</p>	<p>prioritises development which protects or enhances the natural environment and improves biodiversity by moving away from carbon fuel dependency and private motor vehicle use, which would also improve air quality.</p> <p>Health Risk</p> <p>The number of people killed or seriously injured on the roads in Rugby is worse than the national average. Road design should improve safety with traffic calming infrastructure including road humps and road-narrowing and the speed limit in retail and</p>	<p>provision is more than simply a building footprint with no one to occupy it. Thought should be paid to whether secondary care such as mental health counselling is required in an area.</p> <p>Development close to existing services and amenities (schools, healthcare facilities, GP surgeries, sports facilities) should be prioritised so that a greater number of residents can access them.</p> <p>Policy GP2 asserts a settlement hierarchy in favour of Rugby Town</p>	<p>RBC continue to liaise proactively with WCC highways and transport colleagues to ensure local routes are adequate. If bus services are slow to respond to new populations, it is less likely that residents will embed public transport use into their daily routine. Local services should be available in new and existing hubs to obviate the danger that private car use to the town centre is the only option. Without attractive, convenient, safe alternatives commuters will likely</p>
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<p>Policy GP4 - Safeguarding Development Proposal Planning permission will not be granted when it conflicts with development potential of other land or when that land is required for flood risk management.</p>		<p>fringes of schools.</p> <p>Development including space or infrastructure for more active lifestyles should be prioritised. Policy GP1 which favours proactively collaborating with applicants to gain planning approval should not conflict with development involving provision for active lifestyles. Section 106 or CIL agreements should be health focused.</p>	<p>Building for Life.</p> <p>Health figures for Rugby are typically better than the England average. However, there are notable health inequalities between the most and least deprived wards in Rugby Policy GP1 asserts adherence to NPPF principles for sustainable development which includes broad criteria for healthy communities. Community based health and wellbeing facilities should offer a comprehensive approach to health, this should include diet and nutrition advice, sports clubs and job clubs which could address issues of unemployment in more deprived wards.</p>	<p>residential areas should be set at 20 mph. Policy GP1 follows NPPF guidance for sustainability which would broadly acknowledge safety, however there is nothing explicit in the policy about road safety and measures to mitigate danger.</p> <p>The effects of construction such as noise, vibration, dust and odours should be minimised, especially on large projects which may take years to complete. Mitigation of the effects of construction is not addressed in policies GP1-GP5. HS2 have produced a Draft Code of Construction (23-) practice document for phase one of the project. The document acknowledges the impact</p>	<p>which should enable access to the greatest range of facilities. However, the largest planned developments will not be central. The Radio Station (Houlton) site and South West Rugby sites are planned for the town's edge and combined will include 11,200 new homes.</p> <p>These new developments will require new schools and GP surgeries. As communities grow provision of healthcare facilities should grow with them so that strain is not put on surrounding services. Reliable and frequent buses will be important for linking these new settlements to the town centre. Currently provision of green space and sporting facilities in Rugby is comparable</p>	<p>continue to travel by car.</p>
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<p>Policy GP5 - Parish or Neighbourhood level documents</p> <p>Parish and Neighbourhood planning powers are those devolved to communities at the local level which must conform with the local plan, but do give communities relative influence.</p>				<p>of long term construction and contains good practice for how sites should be monitored for dust, exhaust emissions, noise and vibration. Monitoring instruments should be used to understand levels of disturbance and instrumentation such as extractor fans or shielding to limit dust coming off sites must be installed.</p>	<p>with neighbours. New settlements should aspire to match the level currently available across Rugby.</p> <p>Care should be taken that a preference for central development does not impact on smaller commercial and community hubs, drawing existing local activity into the centre resulting in the need for greater private car use from the town's edge. Parish or neighbourhood plans may update an understanding of local need and updated documents should trigger further reviews of policy impacts.</p> <p>Despite a preference for development within the town centre and existing rural boundaries the two largest housing developments are planned for sites on the town's edge.</p>	
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<p>Policy DS1 - Overall Development Needs Overall housing units and employment land hectares planned for Rugby Borough between 2011 and 2031: a) 12,400 additional homes b) 110ha of employment land</p>	<p>Development Strategy</p>	<p>Housing and employment land allocation should be situated in close proximity to services and amenities and should be linked by public transport which makes daily tasks achievable without the need for a private motor car.</p> <p>Greater centralisation and urban density with walkable neighbourhoods and access to frequent and reliable public transport can improve rates of obesity and conditions caused by obesity (13-). Policies DS1 and DS3 describe housing allocation in future developments which prioritise Rugby Town, the most central location for access to services and businesses. However, currently the two largest planned housing developments are the Rugby Radio Station (Houlton) site and South West Rugby site, neither of which are centrally located. It</p>	<p>Development which provides employment for local people should be promoted.</p> <p>Employment and income are key factors in one's health and wellbeing therefore employment which is sustainable and which offers good, secure salaries should naturally be promoted.</p> <p>Policies DS1 and DS4 detail employment allocation in future development. A majority of employment land in Rugby is planned for storage/distribution, as well as a mixture of office based employment and industrial. Because the town's edge is naturally favoured for storage/distribution jobs due to proximity to national roads and cheaper land, new bus routes and dedicated cycle lanes should be created where they do not already exist to link workers between their homes and work.</p>	<p>New housing development must provide housing allocation for older, disabled or vulnerable residents which should be safe and be easily accessible and close to services to embed independence as people get older. ONS forecasts predict the greatest population increase in Rugby for those over age 65 between 2010 and 2035. Policies DS1 and DS3 refer to residential allocations. Short, local journeys by private motor car should be discouraged by offering active transportation alternatives which makes leaving the car at home logical. The Warwickshire Health and Wellbeing Strategy promotes independence for all. If older residents are to feel confident about leaving their cars at home, then alternatives will need to be safe and reliable.</p> <p>Community transportation may expand transport options for those with specific</p>	<p>New development should be close to services, amenities and to sport and leisure facilities or green space where people can keep active and take part in sport.</p> <p>The local plan favours Rugby Town as the prime location for development. Such centralisation should make access to shopping and community amenities easier and limit the need for car travel. Care should be taken however that there are services and suitable shops available locally so that people on the town's edge do not have to travel into the centre by car to access services. This is pertinent because despite a development hierarchy which favours central development close to existing services, the two largest residential sites planned are on the town's edge. Rugby has a comparable core sports facilities</p>	<p>Employment and housing allocations should be well linked with active transport. The Local Plan default is for greater centralisation which is intended to reduce the need for private motor vehicle use.</p> <p>Policy DS5 describes how proposals for strategic sites must include high quality public transport and a comprehensive cycle network. As obesity is a priority issue identified by PHE for Rugby such requirements would be logical. Care should be taken that those living on the town's edge do not live in housing which requires travel into the centre by car to access all services or go shopping. Cycle networks in areas with low cycle traffic can be integrated with public footpaths, bridleways and canal towpaths creating an active network for both commuting and</p>
<p>Policy DS2 - Sites for Gypsy, Travellers and Travelling Showpeople. Land allocation requirements identified for Gypsy, Travellers and Showpeople communities.</p>						
<p>Policy DS3 - Residential Allocations Specific sites where residential units will be allocated and associated</p>						

<p>infrastructure provided.</p>		<p>will be important that frequent and reliable bus links are up and running as soon as people move into these sites and essential services and amenities are accessible.</p>	<p>The Gypsy and Traveller community are vulnerable to many health inequalities (28-) and equitable policies should seek to improve their health.</p>	<p>requirements. Because isolation can be an issue for older people directly related to their circumstances (19-), such services would include the opportunity for socialising. Socialising events such as tea clubs or befriending should be accessible and community run transport services could be encouraged to run services where the council does not.</p>	<p>accessible to the public. Any new development of a considerable size would need to take account of what exists currently and new facilities should be provided when increased population requires new provision.</p>	<p>recreational walking and cycling.</p>
<p>Policy DS4 - Employment Allocations Sites which will be allocated for employment and development and associated infrastructure.</p>		<p>WCC's guidance on Neighbourhood Planning states a preference for neighbourhoods to be designed to encourage active travel that enables residents to walk between all basic amenities within five minutes. Where development takes place outside of the centre it should be close enough to local shops and services otherwise there is a risk that journeys into the town centre by car are the most convenient option. If active transportation is going to be a viable alternative to car use, then the infrastructure must be put in place.</p>	<p>Policy GP2 sets forth how Gypsy, Traveller and Travelling Showpeople will be allocated land which is suitably sited providing privacy, security and is close to local services such as schools and health facilities. Due to health inequalities present in Gypsy, Traveller communities, which include low take up of services (27-), siting which is close to services and which encourages integration with the wider community is important.</p>		<p>Patients who do not live centrally should have adequate access to specialist acute healthcare facilities which are centrally located. There are currently volunteer run community transport options in Warwickshire. The LSP consultation indicated that this may expand in the future. RBC could help to encourage this expansion, which would have particular benefits for less mobile rural residents.</p>	
<p>Policy DS5 - Comprehensive Development of Strategic Sites Requirement that strategic sites of over 100 dwellings be supported, with information outlining how the specific characteristics of each site have been considered in the masterplanning,</p>		<p>This should include frequent and reliable transportation routes</p>				

<p>design and viability assessments of proposals.</p>		<p>and safe and well-designed streets with wide pavements and clear street signage. A strategy to encourage walking described in WCC's document on <i>Green Space Priorities for Warwickshire</i> promotes 'measured miles', distance markers within green spaces or urban environments which walkers can use to measure distance travelled. Walking for Health Groups and Park Runs should be given space in public green space.</p>				
<p>Policy DS6 - Rural Allocations Development or rural allocations should be supported with information outlining how the specific characteristics of each site have been considered in the masterplanning, design and viability assessments of proposals.</p>						

Policy DS7 - Coton Park East Details on specific development site					
Policy DS8 - South West Rugby Details on specific development site					
Policy DS9 - South West Rugby Spine Road North Western Alignment Details on specific development site					
Policy DS10 - Lodge Farm Details on specific development site					

<p>Policy H1 - Informing Housing Mix Requirement that new market housing must form a mix of market housing types and sizes which is consistent with the Strategic Housing Market Assessment</p>	<p>Housing</p>	<p>Health Risk Housing which is in close proximity to community services, healthcare facilities, sport and leisure facilities and shops selling healthy food should be strived for. A broad preference for development close to existing services is made explicit across the local plan. However, policy H4 describes criteria which would allow for affordable housing to be built on rural sites in exceptional circumstances of need. Such development would run the danger of pushing those on low incomes who are more vulnerable to health</p>	<p>Adequate housing is a crucial factor for the health and wellbeing of residents. Those who are particularly vulnerable to health inequalities related to housing are those living on low incomes who would need to spend a greater share of their income on housing and may be less able to afford healthy food or fuel to heat their homes. Adequate provision of affordable housing therefore has a good potential for improving the wellbeing of people in Rugby. Policy H1 asserts that affordable housing should be integrated with market housing</p>	<p>Across Warwickshire there is an aging population who will in many cases require specialist and supported housing. The Warwickshire Health and Wellbeing Strategy prioritises independence for all. Policy H6 addresses the need for specialist housing. It is worded loosely to encourage flexibility. The default for specialist housing for older persons should always be for housing which encourages greater independence. This will mean housing which is close to public transport and within walking distance of shops and services. Public transport</p>	<p>New housing should be easily accessible to services, transportation and shops selling healthy food. Policy GP2 makes clear a hierarchy for development which favours central development or development within existing boundaries close to services and active transportation options. The policies on development strategy are also specific about location of development which will include housing. Rugby Borough's population is projected to increase by 30% before 2035. The</p>	<p>Housing should be adequately linked to services, businesses and to employment opportunity. Housing policies in the local plan are less explicit about transportation however a hierarchy for development which favours central developments served by active transportation options is made clear in policy GP2. Care should be taken that development does not draw existing services away from smaller hubs in the town. New sites which are not developed centrally will require sufficient bus and bicycle routes to link residents to the</p>
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<p>Policy H2 - Affordable Housing Provision Requirement that new housing development will allocate affordable housing. The mix of affordable to market housing is yet to be determined and will be determined during public consultation in September 2016.</p>		<p>inequalities into housing which may perpetuate or compound such inequalities. If development is given approval provision of facilities for active lifestyles and healthy diets would need to be strategised and given the circumstances policy innovation would likely be necessary to ensure access to services.</p>	<p>which would adhere to the government's policy on Mixed Communities (24-). The percentage of affordable housing units for new housing developments is yet to be determined (awaiting public consultation), but this will be part of the planning application for developers.</p> <p>Health Risk Social and affordable housing placed on the urban periphery should be avoided.</p> <p>Policy H4 states that affordable housing (majority social tenure) could, given a lack of other options, be allocated in rural exception sites. Such developments would need to meet specific criteria. Such affordable housing would likely provide for those on low salaries or job seekers allowance with greater health needs in a context which is more likely to be detrimental to their health and wellbeing (a long distance from</p>	<p>will need to be expanded or made more frequent to meet the needs of new residents.</p>	<p>greatest increase will be among age groups over 65. Policy H1 acknowledges housing needs of different types of household including older persons and those with disabilities. This acknowledgement should extend to the services and amenities that will be required by people who may have specific accessibility needs. Healthcare, green space and other services should be accessible for all who live in new developments.</p>	<p>town centre.</p> <p>Housing close to train stations and frequent bus routes should be prioritised. Greater train commuting would reduce travel by private car. Bus routes can also play a vital role in linking older people to a social life. If older people have no confidence in a bus service, they will be more likely to stay at home. If people make this choice over a long enough duration it may have a negative impact on mental wellbeing.</p>
<p>Policy H3 - Housing for rural businesses New build or converted housing in rural locations will only be supported if it meets criteria listed in the policy.</p>						

<p>Policy H4 - Rural Exception Sites Affordable housing will be permitted adjacent to rural settlement boundaries in circumstances normally resisted when criteria is met.</p>			<p>employment and isolated from services and social network). If such housing is to be built developers may need to prove that the housing will be serving those who work in local, rural jobs to justify it. Otherwise good public transportation would be required which may be unviable financially.</p> <p>A Marmot review of the health effects of cold homes (17-) examines the evidence for poorly heated and insulated</p>			
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**Policy H5 -
Replacement
Dwellings**

Replacement of dwellings in the countryside and greenbelt will only be permitted when criteria are met and it falls in line with national planning policy.

homes. The quality of newly built and refurbished housing in large developments should be assessed using a Home Quality Mark (BRE's new standard replacing the now scrapped Code for Sustainable Homes) assessment. Both include health and wellbeing criteria.

Policies H1 - H6 which directly address housing do not state a requirement for CSH or BREEAM. Policy SDC4 stipulates that BREEAM standards should be adhered to for non-residential developments. Like all new housing or newly renovated housing it should be energy efficient with adequate insulation and ventilation installed.

<p>Policy H6 - Specialist Housing The council will encourage the provision of housing that bolsters the independence and choice of older people and those with specific housing needs.</p>						
<p>Policy ED1 - Protection of Rugby's Employment Land Protection of existing and planned sites of employment land. Intensification of existing sites will be encouraged in accordance with policy.</p>	<p>Economic Development</p>	<p>Health Risk Those who are unemployed are more likely to live in poverty and are more vulnerable to mental health issues. Mental wellbeing is a priority issue in Rugby. Policies ED1 and ED2 describe protection of existing employment land and encouragement of new development. Protecting and encouraging</p>	<p>Employment is a crucial factor in the health and wellbeing of individuals. Those who are not working are more likely to live in poverty which increases the likelihood of an unhealthy diet and lifestyle. Policies ED1 and ED2 describe the protection of existing employment land and the development of new employment land.</p>	<p>Development which is reliant on fossil fuels and private motor vehicle use can impact negatively on health in multiple ways, most directly air and water quality which have direct effects on health. The majority of proposed employment land will be use class B8: storage and distribution, which is less suited to centralisation and is more likely to be situated on the outskirts</p>	<p>New core strategy and local plan allocations of employment land should link well with healthy lifestyles for the people who will work in them. Policies ED1 and ED2 are clear about protecting and enhancing employment land. Where new development does occur the planning system should obligate developers to provide</p>	<p>If those in need of employment find commuting difficult due to poor transportation links this will be a barrier to employment for some people. Policy ED2 asserts that new employment land would be favoured centrally which would make commuting easier for those without a car. However, the nature of certain businesses mean</p>

<p>Policy ED2 - Employment development within Rugby Urban Area Classes of employment land permitted within the urban boundary are listed. These are Business, General Industrial and Storage and Distribution</p>		<p>employment in Rugby will have a direct impact on health. Those who do not work are more likely to be living in poverty. Those living in poverty are more likely to be in ill health. The Warwickshire JSNA identifies employment as a key factor in improving mental health. Integrating an understanding of who might be moving into an area is likely to guide better decisions about what kind of healthcare facility a new development might require. For example, a secondary care or mental health facility may be required.</p>	<p>Currently levels of employment in Rugby are high compared to the West Midlands and national average. However, it should be noted that there is a very large disparity for those with long term health problems between Ryton-on-Dunsmore (1,813) and New Bilton (7,760). Between the wards there are disparities in levels of employment. To address this disparity new development should involve employment and training opportunities for NEETs and the long term unemployed should be promoted and training for local people should be encouraged of companies based in Rugby.</p>	<p>of town, thus requiring motor vehicle use. Strategies for workers to get to the city's edge without need for private motor vehicle should be devised. This should include dedicated cycle lanes and if required new bus routes.</p>	<p>new leisure and sports facilities and green space. WCC's <i>Green Space Priorities for Warwickshire (7)</i> asserts that green space infrastructure are ideal projects for section 106 and CIL funding.</p>	<p>that they are more likely to be on the city's edge close to national roads. Sites should be clustered so that bus routes are viable. Protected cycle lanes should be included to encourage less confident cyclists to commute by bike.</p>
<p>Policy ED3 - Employment development outside Rugby urban area Employment land will not be permitted outside of the Rugby Urban area except in certain circumstances which are listed</p>						

<p>Policy ED4 - The Wider Urban and Rural Economy Forms of development which, in principle, are acceptable in and outside the urban area. These are Tourism and Leisure; and Farm Diversification</p>						
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<p>Policy TC1 - Development in Rugby Town Centre</p> <p>Requirements on proposals for redevelopment of the existing natural and built environment in the town centre must demonstrate high quality design</p>	<p>Retail and Town Centre</p>	<p>Health Risk</p> <p>Obesity is a priority health issue identified by PHE for Rugby. Unhealthy fast food outlets should be restricted for any new convenience (food) retail development. Supermarkets and other food retailers should provide affordable healthy food. The Warwickshire Joint Health and Wellbeing Strategy suggests development of policy to limit fast food outlets.</p> <p>A5 use establishments which sell unhealthy fast food should be restricted (see HUDU guidance on restricting New food retailers which sell healthy options should be prioritised. Retail space for social enterprises selling healthy, affordable food should be promoted.</p> <p>Alcohol misuse is a</p>	<p>New development should encourage employment for local people. Those who are unemployed and living in poverty will be less likely to afford healthy food options or heat their homes adequately.</p> <p>Policy TC3 states a priority for development in the town centre. Those in suburban areas or rural communities should also have access to community services and central development should not be a centrifuge which pulls existing services and employment away from the local hubs.</p>	<p>Surfaces on which pedestrian's travel should be wide enough with clearly marked edges between road and pavement. This is especially important for older or vulnerable residents who should feel safe in the town centre. Public areas should be well lit and feel safe. Signage should be legible.</p> <p>Policy TC1 asserts the need for high quality design in new and existing built environment and public space. Care should be taken that such design acknowledges the needs of Rugby's population. For example, that there is adequate pedestrian space for older residents or disabled people.</p> <p>Green space and open public space should be retained or improved.</p> <p>Policy TC1 - Redevelopment and refurbishment of existing</p>	<p>Shops which sell affordable healthy food should be accessible to all residents. Where they are not geographically close public transport options should be frequent and reliable.</p> <p>Policy TC2 details future floorspace for shops and restaurants in the town centre instead of at out-of-town shopping centres. This will encourage more local journeys more easily undertaken by foot, bicycle or public transport. Obesity is a priority health issue for Rugby, identified by PHE. A5 use establishments which sell unhealthy fast food should be restricted (see HUDU guidance on restricting Hot Food Takeaways). Policy TC2 states that new retail floor space for food will more than double between 2020 and 2030. New food</p>	<p>Out-of-town and edge-of-town retail parks encourage shopping habits involving greater private car usage than high street shopping. Big box stores inevitably encourage car use because they sell bulk items or large goods such as electronics or furniture which cannot be transported by bus or bicycle. Active transport options should be encouraged between existing out-of-town retail and the town centre.</p> <p>Policies TC1 & TC3 - Prioritising development in the town centre should encourage greater walkability. The need for car use will be greater negated by denser provision of shops and restaurants located centrally. However public transport to shops and services should still be</p>
<p>Policy TC2 - Rugby Town Centre Comparison and Convenience Floorspace Requirements</p> <p>New retail floorspace by use-type set out in metres</p>						

<p>Policy TC3 - Directing Development in the Town Centre</p> <p>New development in the town centre will be favoured with Edge-of-Town locations next and Out-of-Town least favoured. It is intended that such a requirement will sustain and enhance the vitality of the town centre.</p>		<p>priority issue highlighted by PHE in Rugby. Binge or habitual drinking may be encouraged if new developments include a high proportion of high density bars and off licences. Policy TC2 details new retail provision which is set to increase. Businesses encouraging unhealthy drinking including off licences and bars which encourage vertical drinking should be restricted.</p>		<p>natural and built environment and public space should not remove any green space which already exists.</p>	<p>retailers which sell healthy options should be prioritised. Retail space for social enterprises selling healthy, affordable food should be promoted.</p>	<p>accessible in existing edge-of-town and local hub locations, otherwise those who live close by may be more likely to travel by private motor vehicle to the centre to access them.</p>
<p>Policy TC4 - Primary Shopping Area and Shopping Frontages</p> <p>Change of use of ground floor shopping premises will be permitted if it meets listed criteria</p>						

<p>Policy HS1 - Healthy, Safe and Inclusive Communities Criteria which will be supported to encourage healthy, safe and inclusive communities.</p>	<p>Healthy, Safe and Inclusive Communities</p>	<p>A primary function of planning since its formalisation has been to improve the built environment when it is detrimental to the health of citizens. Policy HS1 describes the principles for creating healthy, safe and inclusive communities. WCC evidence reviews (8,9) encourage provision of decent housing, neighbourhoods well served by active transport links, adequate provision of health, education and community facilities, shops which provide healthy food, as well as</p>	<p>Employment, housing and community services such as community centres, schools and GP surgeries can all be subsidised by new development using section 106 and CIL. Health should be a first thought in these agreements. For allocation of new healthcare facilities providers should be engaged as soon as possible. Planning should seek to foster healthy and inclusive communities which provide adequate provision of services and businesses for all residents. Policy HS1</p>	<p>The built environment should be designed to encourage healthy, safe and active lifestyles. Policy HS1 stresses the importance of design which minimises the potential for crime and anti-social behaviour. Good design would also improve perception of safety and encourage older residents to travel more freely in their communities. This would match up with a priority for greater independence promoted in the Warwickshire Health and Wellbeing Strategy (2014 - 2018). WCC's Neighbourhood Development Planning</p>	<p>Access to safe and accessible space for sport and active pastimes are essential to the health of residents. Policy HS4 describes the open space standards and recreational offer required for every 1000 people. Rugby has an adequate amount of sporting facilities and new development should include new facilities where a population increase requires this. New neighbourhoods should be designed which provide access to</p>	<p>Attention must be paid to the effects planning for the private motor car has had and will have on health and wellbeing. As well as the risks to air quality which motor vehicles pose. Settlements designed with motor vehicle use in mind encourage sedentary lifestyles which are likely to increase the risk of obesity. Policy HS1 asserts support for development which will include active transportation options which will encourage travel on foot or by bicycle. It is important</p>
<p>Policy HS2 - Health Impact Assessments Development proposals will be required to assess their impact on the capacity of existing health services and facilities.</p>						

<p>Policy HS3 - Protection and Provision of Local Shops, Community Facilities and Services Protection of local shops, post offices, pubs and community and cultural facilities from new development which would result in significant or total loss of these amenities.</p>		<p>space for sports and active lifestyles.</p>	<p>states that support will be given to proposals which delivers new healthcare facilities. The policy should be explicit that these healthcare facilities are adequate for communities in which they will be built. Local businesses such as newsagents, post offices or pubs play an important role as impromptu community hubs. Casual and random interactions with fellow community members are important components of cohesive neighbourhoods.</p> <p>Health figures for Rugby are typically better than the England average. However, there are notable health inequalities between the most and least deprived wards in Rugby. Community based health and wellbeing facilities should take a holistic and comprehensive approach to health, this should include diet and nutrition advice, sports</p>	<p>for Health (8) guidance uses Building for Life principles to assert how planning should be used to promote healthier neighbourhoods.</p> <p>Health Risk Air polluted with particulate matter from motor vehicle emissions will have a detrimental effect on health. Alternatives to the private motor vehicle must be encouraged. Policy HS5 asserts that new development which will have significant negative impacts on health should be supported by an air quality assessment and where necessary a mitigation plan. The policy lists an existing strategy to manage air quality which is the declaration of some areas as 'Air Quality Management Areas'. As the policy notes, transport is the primary cause for poor air quality alternatives low carbon active transport options should be promoted.</p>	<p>services and amenities which encourage and enable healthy lifestyles. This should mean a denser built environment in which people are able to get around on foot, bicycle or by public transport. Policy HS1 provides a list of requirements for creating communities which provide access to services and amenities. WCC Joint health and Wellbeing Strategy promotes the positive impact "community hubs" can have on health and wellbeing.</p> <p>Healthcare facilities guaranteed through section 106 and CIL agreements would most appropriately serve new populations if healthcare providers are engaged and consulted early on in the process. New local GP surgeries should be promoted. The way in which primary, secondary and community care are delivered may need to</p>	<p>that frequent and reliable bus routes serve residents. If buses are infrequent then residents may decide to forego less vital journeys. This can cause or compound isolation or loneliness, especially for older residents who do not go to work.</p>
<p>Policy HS4 - Open Space and Recreation Residential development of 10 dwellings and above, shall provide or contribute towards the attainment of the council's open space standards.</p>						

<p>Policy HS5 - Traffic Generation and Air Quality Any development that results in significant negative impacts on health and wellbeing of people in the area as a result of pollution, noise or vibration caused by traffic generation will not be permitted unless effective mitigation can be achieved.</p>			<p>clubs and job clubs which could address issues of unemployment in more deprived wards. Policy HS1 lists how development proposals can contribute to healthier places. The policy does not directly address health inequalities across wards. Protection of community buildings and social infrastructure is listed. Protection and expansion of these things should in principle aid in bridging health inequalities in Rugby's most deprived wards.</p>	<p>Buses which are reliable and frequent should seek to replace commutes and short car journeys. This can only happen if residents know they can rely on buses.</p> <p>Health Risk</p> <p>The number of people killed or seriously injured on the roads in Rugby is worse than the national average. Road design should improve safety with traffic calming infrastructure including road-humps and road-narrowing. The speed limit in retail and residential areas should be set at 20 mph. Policy HS1 lists promotion of healthy and safe places, though there is nothing explicit about road safety.</p>	<p>adapt dependant on the needs of the population. Policy HS1 states that support will be given to proposals which deliver new healthcare facilities. The policy should be explicit that these healthcare facilities are adequate for communities in which they will be built. This will mean that new GP surgeries are developed, but also that secondary and community care are promoted.</p>	
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<p>Policy NE1 - Protecting Designated Biodiversity and Geodiversity Assets The council will protect areas and species of national and local importance for biodiversity and geodiversity. A set of exceptions to this requirement are laid out in the policy.</p>	<p>Natural Environment</p>	<p>Biodiversity and protection of green space may have a direct positive effect on mental wellbeing as it provides space where people can walk, run and stay active. It may also have more holistic effects on health which are harder to measure.</p> <p>Policies NE1 - NE4 cursorily address positive benefits the natural environment can have on lifestyle. The focus of these policies is more on conservation than health. WCC have produced a document outlining <i>Green Space</i></p>	<p>Protection of natural spaces including parks and riversides should function as tools and resources for greater community cohesion as well as employment. A more defined governance of natural spaces by social enterprise, VCS organisations or non-council statutory organisations such as schools and hospitals could improve the management of these spaces. Urban farms could provide employment, and gardening schemes by</p>	<p>Blue and green infrastructure such as bioswales and rain gardens should be included in new developments.</p> <p>Policy NE3 describes directly the borough's policy for blue and green infrastructure. Such infrastructure limits the amount of urban water run off which may contribute to flooding and concomitant water pollution which can impact negatively on one's health. As motor vehicle use is prevalent in Rugby, such</p>	<p>Access to green space can provide direct benefits to health and wellbeing by providing space for active pursuits as well providing more holistic benefits and should be protected and enhanced. Policy NE1 states an intention to protect areas of biodiversity with proportionality stressed according to importance and status of species. New development is allowed where it protects or enhances existing natural environments. Greater</p>	<p>Natural areas such as canals and waterways can also function as active routes both for commuting and leisure.</p> <p>Policies NE1 - NE4 focus on conservation of natural resources and biodiversity and transport is not addressed. However, this protection could be greater enhanced if people use canal towpaths and river walkways for walks or bicycle rides. Where access is restricted it should be improved. This can also have a positive impact on local</p>
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<p>Policy NE2 - Biodiversity New development will be permitted provided that it protects, enhances and/or restores biodiversity. Where a development will have a negative impact on a biodiversity asset, mitigation will be sought.</p>		<p><i>Priorities for Warwickshire (7)</i> which assert the benefits to diet and lifestyle of green space. Approximately three quarters of adults in Rugby do not eat recommended amounts of fresh fruit and vegetables and allotments, community gardens and even encouragement of guerrilla gardening can have a positive impact on these figures.</p> <p>Green space can have a positive impact on one's mental wellbeing.</p>	<p>social enterprises like Groundwork could provide training for NEETs and long term unemployed people.</p> <p>New green/blue infrastructure such as rain gardens could be given over to local schools or community centres as gardens for growing.</p>	<p>infrastructure may have a strong impact.</p>	<p>consideration should be given to the possibility that local VCS or social enterprise could be tasked with the management of green space which could partner with schools and community centres.</p> <p>Green spaces should be safe for all people. Natural surveillance should be possible in parks so that more vulnerable residents are safe and perceive they are safe.</p> <p>Management of green spaces and parks could be delegated to VCS groups which would increase natural surveillance by giving responsibility for green space mitigating the risk that they become hotspots for crime or anti-social behaviour.</p>	<p>businesses such as cafes and pubs who may gain greater custom.</p>
<p>Policy NE3 - Blue and Green Infrastructure The council will work with partners to create a comprehensive green infrastructure plan. Green and blue infrastructure is a strategy for mitigating urban climate change factors</p>		<p>Policies NE1 - NE4 assert the importance of protecting and enhancing the physical natural environment in Rugby. Justification for this can be enhanced by acknowledging the positive impact activities in parks and green space can have on one's mental wellbeing. WCC's <i>Green Space Priorities for Warwickshire (7)</i> document makes the case for this and posits</p>			<p>Access to healthy food grown locally should be prioritised to address obesity. Local food growing can be achieved through partnerships with social</p>	

<p>through instalment of physical infrastructure.</p>		<p>the idea that positive therapeutic impacts on anxiety and depression gained from greater access to green space may have a cost saving benefit for public budgets which allocate care and medicine for those with mental illness.</p>			<p>enterprises who can be allocated land owned by the council or in schools and hospitals.</p>	
<p>Policy NE4 - Landscape Protection and Enhancement New development which positively contributes to landscape character will be permitted.</p>						

<p>Policy SDC1 - Sustainable Design All development should demonstrate high quality sustainable design and will be permitted where proposals are of a scale, density and design that would not cause any material harm.</p>	<p>Sustainable Design</p>	<p>Design of the built environment has a broad and important impact on the health and wellbeing of residents. Policies SDC1 and SDC4 describe the importance of building and housing design. WCC's Joint Health and Wellbeing Strategy (11) identifies a number of measures for health minded design, these include the discouragement of shelters for smoking.</p>	<p>The quality and design of the built environment has direct effects on health. Air ventilation, sound insulation and privacy of personal space and perception of the ownership of shared space can all impact on one's health.</p> <p>Policy SDC1 promotes high quality design for new developments. WCC's Joint Health and Wellbeing Strategy (11) identifies a need in the private sector for improvement of housing which does not meet the Decent Homes Standards like social housing across the borough does. HUDU's guide to HIA (3) recommends that a CSH or BREEAM assessment should be undertaken on buildings in all new major developments. Such assessments include criteria for health and wellbeing. CSH is no longer the industry standard, however such standards are still important measure of how healthy housing is.</p>	<p>Good design can address issues such as urban runoff when water in cities is not able to drain adequately and can pick up oil, chemicals and fertilisers which is then introduced to water systems and negatively affects water quality. Green and blue infrastructure such as bioswales and rain gardens should be included in new developments to mitigate the effects of urban runoff.</p> <p>Policy SDC6 requires appropriate Sustainable Urban Drainage Systems (SUDS) in developments. This would involve the integration of green infrastructure. Policy NE3 addresses directly the borough's policy on green and blue infrastructure. The number of people killed or seriously injured on the roads in Rugby is worse than the national average. Road design should improve safety with traffic calming infrastructure including</p>	<p>Sustainable design must take a whole system approach. For example, if a building is energy efficient but stands alone miles away from employment, shops, services and other amenities then energy efficiency features will be undermined by barriers to access, or by the need for private motor vehicle. Policy SDC1 states the council will consider appropriate density on a site by site basis. Density of buildings should influence provision of shops and services and this would ideally be funded in part by section 106 agreements or CIL. WCC's guidance on Neighbourhood Planning states a preference for neighbourhoods to be designed to encourage active travel that enables residents to walk from amenities</p>	<p>Commuting is a daily and essential habit. If dependence on the private motor car to commute is to be broken then new habits must be attractive, viable and easy to transition to. Design of the built environment plays a key role in enabling this. Policy SDC1 asserts that the council will consider the density of housing on a site by site basis. Given that preference for central development would lead to higher density housing, storage for bicycles may be difficult for those who will live in low density flats. Secure on street or communal bicycle parking should be provided in such cases. Buses must be reliable and frequent so that people can trust that if they leave their car at home they will arrive at their destination on time.</p>
<p>Policy SDC2 - Landscaping Appropriate hard and soft landscaping will be required as part of development proposals</p>		<p>Decent and affordable internet which is accessible to all can influence how people access information about healthy eating and keep fit and sporting activities.</p> <p>Policy SDC9 addresses the importance of comprehensive broadband infrastructure and improved broadband speeds. WCC document on Neighbourhood Development Planning for Health contains</p>				
<p>Policy SDC3 - Protecting and enhancing the historic environment Development which sustains and enhances the Borough's heritage assets</p>						

will be supported		guidance noting the importance of broadband for employment as well as remote patient monitoring and general health information that can be accessed online.	A new standard promoted by BREEAM is the Home Quality Mark which will include similar requirements for homes such as adequate insulation for warmth and noise as well as ventilation.	road humps and road-narrowing and the speed limit in retail and residential areas should be set at 20 mph. Policy SDC1 describes all development to be high quality, inclusive and sustainable. Factors are broadly listed, but there is nothing specific about roads or traffic calming measures.	within a five-minute radius.	
<p>Policy SDC4 - Sustainable Buildings</p> <p>Requirements for residential and non-residential buildings: Residential building requirements focus on adequate provision of water. Non-residential buildings of a certain size will be required to achieve BREEAM standards which include health and wellbeing criteria</p>				<p>The effects of construction such as noise, vibration, dust and odours should be minimised, especially on big development projects which can take years to complete.</p> <p>Mitigation of the effects of construction is not addressed in policies GP1-GP5. HS2 have produced a Draft Code of Construction (23-) practice document for phase one of the project. The document acknowledges the impact of long term construction</p>		

<p>Policy SDC5 - Flood Risk Management A strategic approach to development which steers new development to areas with the lowest probability of flooding.</p>			<p>and asserts how sites should be monitored for dust, exhaust emissions, noise and vibration. Monitoring instruments should be used to understand levels of disturbance and equipment such as extractor fans or shielding to limit dust coming off sites should be installed.</p>		
<p>Policy SDC6 - Sustainable Urban Drainage Appropriate urban drainage systems are required in all developments. These will include green infrastructure functions and</p>					
<p>Policy SDC7 - Protection of the Water Environment and Water Supply Developers will ensure there is an adequate water supply to serve existing</p>					

and new development.						
Policy SDC8 - Supporting the provision of renewable energy and low carbon technology Proposals for new low carbon and renewable energy technologies will be supported in principle subject to criteria.						
Policy SDC9 - Broadband and mobile internet New developments will facilitate and contribute to the provision of broadband infrastructure						

<p>Policy D1 - Transport Development will be permitted where sustainable transport is prioritised and new transport impacts are mitigated.</p>	<p>Delivery</p>	<p>Design of the built environment should acknowledge its broad and vital impact on the health and wellbeing of residents. Density of housing and location of employment and shops play a very large role in how people go about their day. Policy D3 asserts that new planning applications will need to acknowledge the impact development can have on lifestyles. Shops and restaurants which sell healthy food should be maximised whilst hot food takeaways and high density bars which encourage vertical drinking should be restricted. Engagement of healthcare providers such as the CCG should happen as soon as possible in the planning process and section 106 or CIL agreements. If healthcare facilities are to be relevant and adequate, then those best disposed to advise on what is required need to be engaged</p>	<p>Delivery of sustainable and viable development should not be at the expense of communities who are already living in an area. Policy D3 makes clear that if new development will put pressure on existing services and infrastructure new provision shall be constructed or provided. Policy D4 asserts that the council shall use CIL to obligate developers and landowners to pay a flat rate which can be used to fund new education, healthcare and community facilities.</p>	<p>New development will have a number of impacts to the environment in particular on air quality and in greater requirement for community safety. Policies D1 and D2 which cover transport and parking address the impact road traffic will have. Rugby is identified by PHE as having more dangerous and fatal roads than the national average and new development should be permitted when an application has proven that car usage can be reduced.</p>	<p>Development which benefits all residents should be maximised. As housing and employment communities expand services and amenities should increase accordingly. Policy D4 outlines how CIL should be used to fund new or improved community infrastructure. This should be proportionate and appropriate to what communities require.</p>	<p>Provision and space for viable and convenient alternatives to the private motor car should be the default for all new developments. This would address issues of obesity and air quality. Policy D1 directly outlines the need for a clear transport assessment to be undertaken on new developments. Transport options which encourage active habits such as cycling, walking and using public transportation need to be prioritised.</p>
<p>Policy D2 - Parking Facilities Planning permission will only be granted where it incorporates adequate parking.</p>						
<p>Policy D3 - Infrastructure and implementation Scale and pace of development should be determined by capacity of existing infrastructure. Where this is not possible new infrastructure</p>						

<p>or better management of existing infrastructure will be required.</p>		<p>from the start. A section 106 or CIL agreement may allocate space for a GP surgery but if a no one is engaged to provide care at a location then such agreements may only result in an unoccupied space.</p>				
<p>Policy D4 - Planning Obligations Requirement to mitigate impact of development where required with use of the Community Infrastructure Levy, a flat rate contribution towards infrastructure required of developers for larger developments</p>						

<p>Policy D5 - Airport flightpath safeguarding The council will safeguard Coventry Airport flight paths</p>						
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Appendix 2

Stakeholder Consultation

- 6.5 An important stage of the HIA was stakeholder consultation of those in Rugby best disposed to comment on health factors of the Local Plan. The purpose of the consultation was to gain feedback on a draft of the policy matrix and an emerging set of conclusions and recommendations and to improve the local relevancy of the HIA. Two consultation meetings were held, one with the Rugby Local Strategic Partnership (LSP) who were able to assess it in light of their remit for wellbeing, employment and education and financial inclusion. Following the LSP meeting the Local Estates Forum (LEF) were consulted. The purpose of the LEF consultation was to gain a perspective from those who manage NHS estates in Rugby and Coventry which directly borders West Rugby.

Rugby Local Strategic Partnership Meeting – Thursday 22nd September 2016

- 6.6 The LSP met to discuss the Local Plan which was due to go out to consultation on Monday 26th, four days subsequent to the meeting. The draft policy matrix had been sent to members, prior to the meeting, who had read it in order to comment.
- 6.7 There was a broad agreement that the policy matrix had addressed factors and consequences for health of the local plan. However, members of the LSP felt there may be a gap between those recommendations which would improve the health of people in Rugby and the reality of implementing them.
- 6.8 The issue of accessibility was emphasised heavily. Whilst many in the room agreed that strategies to reduce car use were important, one member discussed the difficulty for older people without a car who had to rely on buses. It was felt that currently bus services could be infrequent and unreliable. If services were unreliable and older people did not feel confident that their bus would arrive it was not illogical to believe they may forego non-essential journeys. If enough such journeys were missed this might lead to isolation.
- 6.9 It was agreed that bus services were essential to accessibility and mobility, but that with budget reductions ongoing adequate and comprehensive bus services were uncertain.
- 6.10 Community and voluntary transport was discussed as this was recommended in the policy matrix. There is currently already a community transport service with volunteer drivers in Warwickshire. It is hoped that this service will be expanded.
- 6.11 The issue of rural isolation and transport was raised. Improved transportation links would certainly address isolation for those in rural communities. However, budgets for such services may not be forthcoming.
- 6.12 There was concern that the matrix did not make enough of a case for the presence of GP surgeries. In the East of Rugby where the Radio Station Rugby (Houlton) site will be developed eight new GP

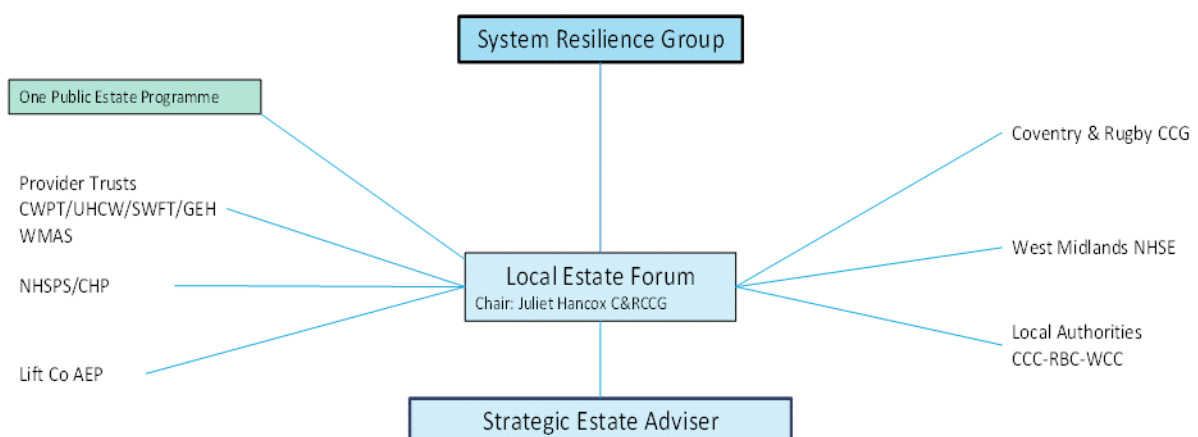
surgeries are planned for the area. However, there was concern in the room that there would be inadequate provision of GP services before construction of surgeries caught up with new housing. Development of GP surgeries will be triggered when 3,100 homes are constructed. Early provision of GP surgeries is unlikely to be immediate and there is a risk that this will fall on existing services and impact on surrounding areas.

- 6.13 It was agreed that if GP surgeries and other services were not in place by the time people were moving into new developments then car travel into the town centre would be unavoidable.
- 6.14 The issue of green space was discussed. It was agreed that green space was important and those around the room felt that green space in Rugby was generally safe and well cared for. However, more should be done to encourage older people to use green space.
- 6.15 After consultation for the HIA the meeting moved on to a presentation from Urban and Civic, the land developer responsible for the Radio Station Rugby development.
- 6.16 Matters of green space (green corridors) and transportation were cursorily discussed during the brief presentation.
- 6.17 Finally, the meeting moved to the matter of community audits and some interesting initiatives in some of Rugby's more deprived wards were discussed. This included community gardening and re-appropriation of a church for community use.

Coventry and Rugby Local Estates Forum Meeting – Friday 23rd September 2016

- 6.18 The LEF consultation was held after a regularly scheduled LEF meeting. The LEF was formed on 25th September 2015, to plan strategic estate needs in Coventry and Rugby that may impact on the estate. The purpose of the LEF consultation was to gain an understanding of challenges for NHS estates in Rugby and surrounding authorities in delivering health requirements for Rugby and how the local plan could support these requirements. Governance arrangements for the LEF can be seen below in Figure 9.

Figure 9 - Local Estates Forum Governance



6.19 Like the LSP meeting LEF members were sent a draft of the policy matrix prior to the meeting. In the LEF meeting members were asked to respond to two questions.

6.20 Two important points were raised outside of the scope of these questions:

- This HIA may play an important part in raising the profile of health requirements in planning decisions. However, it was agreed that site specific discussions should take place.
- In the meeting prior to HIA consultation the LEF had proposed a planning group within the LEF to specifically discuss planning matters

6.21 Responses to the questions raised in the consultation are included below:

What are the LEF (estate related) challenges in delivering the health requirements for Rugby?

6.22 Responses to the question are below:

6.23 Accommodating for population growth in primary care and accessing section 106 or CIL funding to respond to this need should be improved.

6.24 Involving healthcare providers at an earlier stage would improve access to section 106 and CIL funding and improve the way it is spent.

6.25 Currently it is felt that capacity to respond to need for acute/secondary care as well as beds, theatres, administrative space and parking was difficult.

6.26 Public transportation access to acute and secondary care needs to be improved. Currently UHCW subsidises buses from Rugby Town Centre.

6.27 With budget reductions continuing often estates needed to reconfigure or co-locate in buildings which were not fit for purpose.

6.28 Greater profiling of new workforce/populations would enable the CCG and social services to respond to required estates allocation. An example was raised of the warehousing and distribution work in Rugby which is attracting new residents from Eastern Europe. Healthcare provision would be improved if it was attuned to new communities.

6.29 Estates may be old and inappropriate to a community which has changed, whilst the estate has not.

6.30 Involvement in section 106 and CIL funding decisions should be improved and the process streamlined.

6.31 Rural communities need to be engaged.

How can the local plan support health requirements for Rugby?

6.32 Responses to the question are below:

6.33 It was felt that a greater number of smaller GP practices were required and that health providers should be consulted in plan making at an earlier stage so that when health facilities are allocated in section 106 and CIL funding, there is a provider who will run a facility.

6.34 The response to estates needs by planners is more "topographical than financial". Provision of land for healthcare should be twinned with engagement of healthcare providers to manage care for a new

development. Without this involvement from healthcare providers there is a danger that the land will be allocated but no healthcare provider will occupy it.

- 6.35 Involving the CCG might encourage a greater understanding of the type of healthcare facility required in an area. It was felt that little thought was paid to secondary or mental health care when new developments are proposed.
- 6.36 Housing which encourages independence is important. This should mean that housing which is specifically for older residents should be close to services and amenities. Independence is a priority issue for identified by the Warwickshire Health and Wellbeing Board. New developments should acknowledge the importance of independence when building housing for older residents.

Appendix 3

Local Plan Policies

Each policy from the plan is included in this section. Each policy category is listed below. Policies are broken down into these categories.

- **General Principles**
- **Development Strategy**
- **Housing**
- **Economic Development**
- **Retail and Town Centre**
- **Healthy, Safe and Inclusive Communities**
- **Natural Environment**
- **Sustainable Design and Construction**
- **Delivery**

General Principles:

Policy GP1: Securing Sustainable Development

When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

Policy GP2: Settlement Hierarchy

Development will be allocated and supported in accordance with the following Settlement Hierarchy:

Rugby town

Focus for all development in the Borough. Development permitted within existing boundaries and as part of allocated Strategic Urban Extensions.

Main Rural Settlements Binley Woods, Brinklow, Clifton upon Dunsmore, Dunchurch, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston, Wolvey.

Development will be permitted within the existing boundaries of all Main Rural Settlements.

Rural Villages

Development will be permitted within existing boundaries only, including the conversion of existing buildings where national policy permits.

Countryside

New development will be resisted; only where national policy on countryside locations allows will development be permitted.

Greenbelt

New development will be resisted; only where national policy on Green Belt allows will development be permitted.

Policy GP3: Previously Developed Land and Conversions

The Council will support the redevelopment of previously developed land in consideration of the following:

- The visual impact on the surrounding landscape and properties;
- The impact on existing services if an intensification of the land is proposed;
- The impact on any heritage or biodiversity assets

In addition, the Council will support and promote the innovative reuse of the existing building stock for social, cultural and economic purposes. Proposals to re-use and adapt existing buildings will be permitted subject to the following criteria:

- The building is of permanent and substantial construction;
- The condition of the building, its nature and location, makes it suitable for re-use or adaptation;
- The proposed use or adaptation can be accommodated without extensive rebuilding;
- The proposal is of a high quality and sustainable design, retaining the external and/or
- Internal features that contribute positively to the character of the building and its surroundings the proposal retains and respects the special qualities and features of listed and other traditional rural buildings, and;
- The appearance and setting of the building following conversion protects, and where possible enhances, the character and appearance of the countryside.

When granting permission for any development under this policy the Council will remove any permitted development rights applying to the building and its curtilage.

Policy GP4: Safeguarding development potential

Planning permission will not be granted for development, which would prejudice:

- The development potential of other land being realised, including the comprehensive development of a larger site;
- The provision of infrastructure; or
- Land that is demonstrated as required for flood risk management.

Policy GP5: Parish or Neighbourhood level documents

Where the views of a community are expressed in a Parish Plan (or equivalent), they will be considered in the planning system. For the views of a community to be considered, the Parish Plan will need to:

- have been endorsed by Rugby Borough Council;
- be in conformity with national policy; and
- be regularly updated if necessary

The use of parish plans will principally inform:

- the determination of a planning application;
- force the ability the requirement and scope of development contributions associated with a planning create
- the assessment of schemes in the context of a need identified through the Parish Plan.

Development Strategy

Policy DS1: Overall Development Needs

The following levels of housing and employment development will be planned for and provided within Rugby Borough between 2011 and 2031:

- a) 12,400 additional homes.
- b) 110ha of employment land

All new development will be sustainable and of a high quality, fully supported by infrastructure provision and environmental mitigation and enhancement as required in the policies contained within this Plan.

Policy DS2: Sites for Gypsy, Travellers and Travelling Showpeople

The Council will allocate land to accommodate requirements as identified by the Gypsy and Traveller Accommodation Assessment 2014, where compliant with Annex 1 of the Planning Policy Traveller Sites. The GTAA will be updated on a regular basis and as such the pitch allocations requirements will be updated through the GTAA process. The requirements identified in the GTAA 2014 are as follows: Timeframe Total required pitch provision 2014/15 to 2018/19 24 +5 transit 2019/20 to 2023/24 18 2024/25 to 2028/29 15 2029/30 to 2033/34 8 Total 65 If necessary, the pitch provision outlined above will be updated following review of the GTAA against the update to the PPTS. This update will be used as evidence in the identification and allocation of land for sites for pitches in the Gypsy and Traveller Site Allocations DPD and in the determination of applicable planning applications.

In assessing the suitability of sites for residential and mixed use occupation by Gypsies, Travellers and Travelling Showpeople, and for the purposes of considering planning applications for such sites, proposals will be supported where the following criteria are met:

- The site is cumulatively appropriate and proportionate to the nearest settlements, its local services and infrastructure;

- The site affords good access to local services such as schools and health facilities;
- The site is not at risk of flooding or adjacent to uses likely to endanger the health of occupants such as a refuse tip, sewage treatment works or contaminated land;
- The development is appropriate in scale compared to the size of the existing settlement;
- The development will be able to achieve a reasonable level of visual and acoustic privacy both for people living on the site and for those living nearby;
- The development has appropriate vehicular access;
- The development will provide a high-quality frontage onto the street which maintains or enhances the street scene and which integrates the site into the community;
- The development will be well-laid out to provide adequate space and privacy for residents;
- The development will include appropriate landscape measures to avoid visual impact and to ensure adequate levels of privacy and residential amenity for occupiers and adjacent occupiers; that avoids enclosing a site with so much hard landscaping, high walls or fences;
- The development should not accommodate non-residential uses that would not cause, by smell, noise or vibration, significant adverse impact on neighbouring business or residents;
- Adequate provision for on-site services for water supply; power; drainage; sewage disposal; and waste disposal facilities; and
- The development complies with the other relevant policies in this Plan.

Policy DS3: Residential allocations

The following sites will be allocated for residential development and associated infrastructure and uses as shown on the Proposals Map:

Rugby Urban Edge	Ref Site Name	Dwellings
DS3.1	Coton House	Up to 100
DS3.2	Coton Park East	855
DS3.3	Rugby Gateway*	1300
DS3.4	Rugby Radio Station*	Up to 6200
DS3.5	South West Rugby	Up to 5000

*planning permission granted and under construction

Main Rural Settlements

- DS3.6 Land at Sherwood Farm, Binley Woods Up to 75
- DS3.7 Land off Lutterworth Road, Brinklow Up to 100
- DS3.8 Land North of Coventry Road, Long Lawford Up to 100
- DS3.9 Leamington Road, Ryton on Dunsmore** Up to 75
- DS3.10 The Old Orchard, Plott Lane, Stretton on Dunsmore Up to 25
- DS3.11 Land Off Squires Road, Stretton on Dunsmore 2 Up to 50
- DS3.12 Linden Tree Bungalow, Wolston Lane, Wolston Up to 15
- DS3.13 Land at Coventry Road, Wolvey Up to 10

DS3.14 Wolvey Campus, Leicester Road, Wolvey Up to 80

** Implementation of site allocation DS2.8 can only occur when adequate replacement of pitch provision is made to the satisfaction of Rugby Borough Council and Sport England in accordance with national planning policy.

Garden Village

DS3.15 Lodge Farm, Daventry Road

Up to 1500

Policy DS4: Employment allocations

The following sites will be allocated for employment development and associated infrastructure and uses as shown on the Proposals Map:

Ref	Site name	Allocation
DS4.1	Coton Park East	7.5 ha
DS4.2	Rugby Radio Station*	16 ha
DS4.3	South West Rugby	35 ha

Policy DS5: Comprehensive Development of Strategic Sites

Proposals for the development of strategic sites of over 100 dwellings should be supported with information outlining how the specific characteristics of each site have been considered in the masterplanning, design and viability assessments of proposals.

More specifically, proposals for strategic sites must include:

- Provision of and/or connection to a direct, high quality public transport link between the site and key transport hubs such as railway stations and the town centre; ☐ Provision of and/or connection to a comprehensive cycle network to link residential areas with the key on-site facilities, such as schools and community buildings; and comprehensive connections to existing adjacent developed areas;
- Further on-site and off-site measures to mitigate transport impact as detailed in the Infrastructure Delivery Plan, including access to the local road network as deemed necessary through the Transport Assessment and agreed by Warwickshire County Council and the Highways Agency;
- Provision of and/or contribution to community facilities such as schools, community buildings and sports facilities;
- Comprehensive onsite Green Infrastructure Network, utilising existing habitats, where possible, which links to adjacent networks;
- An assessment of the energy requirements of the proposed development and measures to minimise energy use and include renewable energy generation.

The specific characteristics of each site will determine how the above requirements will be met. This will be influenced by constraints, and the masterplanning, design and viability, where relevant policies in this local plan apply.

Further onsite requirements are determined through the application of other relevant policies in this plan.

Policy DS6: Rural Allocations

This policy will be applied to all detailed proposals relating to sites DS3.6 to DS3.14 allocated by Policy DS3.

Proposals for the development or rural allocations should be supported with information outlining how the specific characteristics of each site have been considered in the masterplanning, design and viability assessments of proposals.

More specifically, proposals for rural housing sites allocated through this Local Plan must make specific consideration for the following:

Policy DS6: Rural Allocations

This policy will be applied to all detailed proposals relating to sites DS3.6 to DS3.14 allocated by Policy DS3.

Proposals for the development or rural allocations should be supported with information outlining how the specific characteristics of each site have been considered in the masterplanning, design and viability assessments of proposals.

More specifically, proposals for rural housing sites allocated through this Local Plan must make specific consideration for the following:

- The appropriate treatment of Green Belt boundaries, where relevant, limiting the impact of the development on the Green Belt;
- Density of development sympathetic to the settlement to which it will extend;
- The provisions of any relevant Neighbourhood Plans in place; or extensive community engagement during the development of proposals;
- Provision, where opportunities are present, of links to existing pedestrian and cycle paths with the adjacent settlement;
- Where opportunities are present, provision for a comprehensive onsite Green Infrastructure Network, utilising existing habitats, where possible, linking to adjacent networks;
- Provision of and/or contribution to community facilities such as schools, community buildings and sports facilities;
- Provision and/or improvement to telecommunications infrastructure, including broadband and mobile telephone services. Further onsite requirements are determined through the application of other relevant policies in this plan.

Policy DS7: Coton Park East

This development site, as shown on the Proposals Map, is allocated to provide 855 dwellings and 7.5Ha employment land.

Employment development at this location will be provided to meet the qualitative demand for smaller units in the range of 5,000 -50,000 sq.ft., in B1c, B2 and ancillary B8 employment uses.

The development of this sustainable urban extension will be supported by the provision of:

- A local centre that contains a one form entry primary school, with flexibility to increase to two form entry, if demonstrated necessary and provision for the emergency services, as set out in the IDP;
- A comprehensive Green Infrastructure Network, which protects, enhances and links into adjacent networks and utilises existing habitats where possible, particularly those present at the disused Great Central Railway local nature reserve;
- Further on-site and off-site measures to mitigate transport impact as detailed in the Infrastructure Delivery Plan, including access to the local road network as deemed necessary through the Transport Assessment and agreed by Warwickshire County Council and Highways England;
- Provision of a direct, high quality public transport link between the site, the railway station and the town centre;
- Provision of a comprehensive cycle network to link residential areas with key on-site facilities and to service centres and community facilities located in existing adjacent development areas;
- An assessment of the energy requirements of the proposed development and measures to minimise energy use and include renewable energy generation.

Further on site requirements are determined through the application of other policies in this Local Plan.

Policy DS8: South West Rugby

A new neighbourhood of up to 5,000 dwellings and 35Ha of B8 employment land will be allocated at land to the South West of Rugby, as delineated on the Proposals Map.

Proposals within this allocation must be built out in accordance with the South West Rugby Masterplan SPD.

Provision of the following onsite services and facilities must be made within the four local centres as identified in the South West Rugby Masterplan SPD, and as follows:

- Provision for at least one secondary school, to be co-located with a one form entry primary school (rising to two form entry, as deemed necessary by Warwickshire County Council), as detailed in the IDP;
- Provision for a further three primary schools, each to be one form entry, rising to two form entry, as deemed necessary by WCC Education, as detailed in the IDP;
- Provision for a 3 GP surgery, rising to 7 GP surgery, as detailed in the IDP;

- Provision of a Safer Neighbourhood Team, with associated onsite facilities, as detailed in the IDP;

Provision of land for an onsite fire and rescue provision, as detailed in the IDP; The site must also contain comprehensive sustainable transport links that integrate with existing networks and provide good connectivity within the development and to the surrounding area including:

- An all traffic spine road, as identified in Policy DS8, the Masterplan SPD and Proposals Map, connecting the site to the existing highway network, phased according to milestones identified through the IDP;
- Provision of a comprehensive walking and cycling network to link residential areas with the key facilities on the site, such as schools, health centres and food stores; and;
- High quality public transport services to Rugby Town Centre;
- Further on-site and off-site measures to mitigate transport impact as detailed in the IDP, including access to the local road network as deemed necessary through the Transport Assessment and agreed by Warwickshire County Council and Highways England. These measures will take account of the proposals within the Infrastructure Delivery Plan as they evolve.

In addition to the above proposals must:

- Include a comprehensive Green Infrastructure Network that links to existing adjacent networks utilising existing habitats and historic landscapes, in particular Cawston Spinney;
- Specifically regarding the wider Cawston Spinney, a comprehensive 30m buffer must be
- identified and maintained through proposals made in the allocation;
- Include an assessment of the energy requirements of the proposed development and measures to minimise energy use and include renewable energy generation.

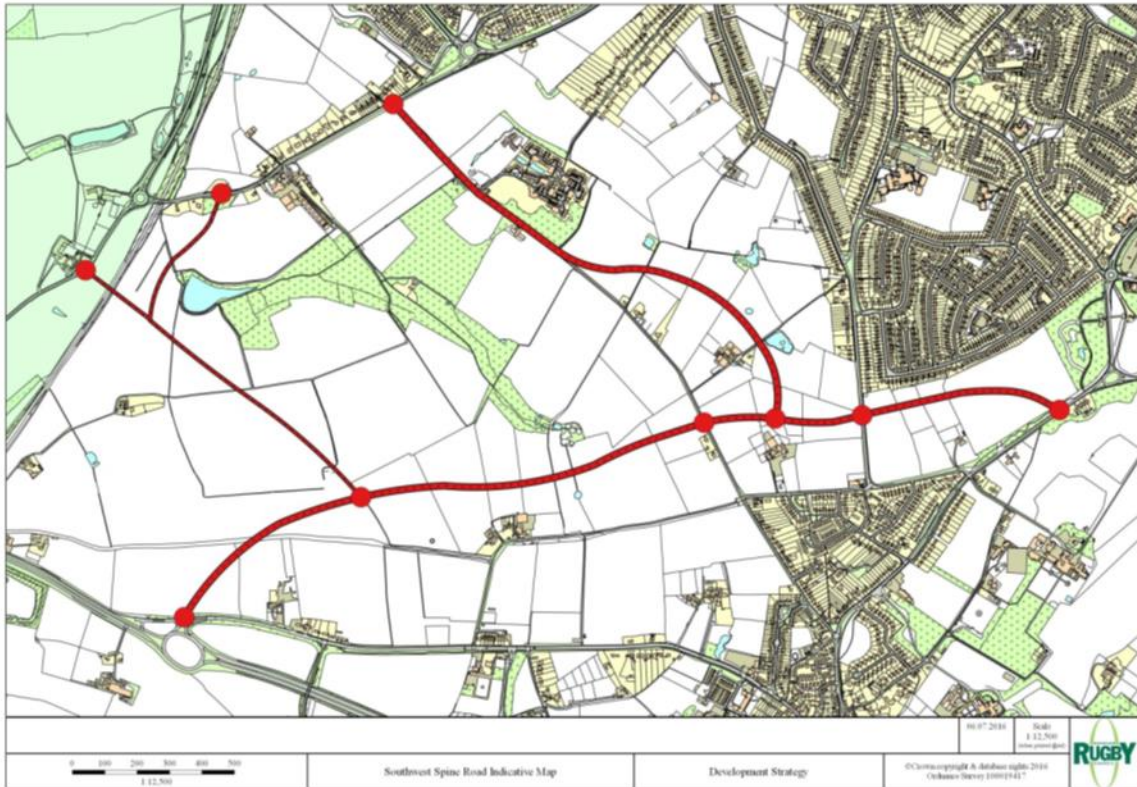
Development proposals shall respect and maintain the physical and visual separation of Rugby town and Dunchurch to protect their individual character and identity. A buffer, as identified on the framework plan below, must form an integral part of proposals for the site.

Further onsite requirements are determined through the application of other relevant policies in this plan.

Development proposals must come forward comprehensively and be in accordance with the South West Rugby Masterplan SPD, Proposals Map and Policy DS9 below. Rugby Borough Council will not support ad hoc development which is contrary to the achievements of this policy.

Policy DS9: South West Rugby Spine Road North Western Alignment

The Borough Council will allocate land to facilitate the full alignment of the South West Rugby spine road to support and enable the delivery of the South West Rugby allocation, as identified on the plan below and Proposals Map.



No development which is likely to prejudice delivery of this alignment will be permitted. The precise specification and routing of the road must be provided in compliance with the South West Rugby Masterplan SPD.

The masterplanning and phasing of all proposals for the South West must seek to enable delivery of the full spine road as early as possible post commencement of development on site, in accordance with the Infrastructure Delivery Plan.

Policy DS10: Lodge Farm

This development site, as shown on the Proposals Map, is allocated to provide a garden village of 1500 dwellings. This new settlement will become a self-sustaining, Main Rural Settlement of Rugby Borough, characterised by its high-quality design, attractive setting and provision of new social infrastructure that will sustainably support a new and growing community.

The development of this garden village will be supported by the on-site provision of:

- A local centre;
- A one form entry primary school, with flexibility to increase to two form entry, if deemed necessary by Warwickshire County Council, within the local centre;
- A connected layout of functional streets and roads that ensure the on-site road network is efficient, providing an ease of movement for vehicles, pedestrians and cycles;
- A comprehensive Green Infrastructure Network, which protects, enhances and links into adjacent networks and utilises existing habitats where possible;

- Specifically regarding the areas of woodland on site, a comprehensive buffer must be identified and maintained through proposals made in the allocation;
- Landscaping on all site boundaries to mitigate the visual impact of the development, particularly upon the surrounding open countryside;
- Provision of a direct, high quality public transport link between the site and surrounding villages, Rugby and Daventry;
- A comprehensive cycle network across the settlement, linking residential areas with key on-site facilities and links to existing off site cycle networks to ensure longer distance cycle connections are provided;
- An assessment of the energy requirements of the proposed development and measures to minimise energy use and include renewable energy generation;
- High quality telecommunications infrastructure, including broadband and mobile telephone services.

Delivery at this location is enabled as a result of infrastructure provided as part of the South West Rugby development allocation as detailed in Policies DS7 and DS8 of this Plan and the improvements in the capacity of the local highway network that result from the infrastructure investment detailed within those policies and IDP. Contributions to the provision of the South West Rugby spine road will be made as part of this development, as outlined in the Infrastructure Delivery Plan.

Further off-site measures to mitigate transport impact as detailed in the Infrastructure Delivery Plan, including access to the local road network as deemed necessary through the Transport Assessment and agreed by Warwickshire County Council, Northamptonshire County Council and Highways England.

Further on and off site requirements are determined through the application of other policies in this Local Plan.

Housing

Policy H1: Informing Housing Mix

To deliver a wide choice of high quality market homes across the Borough, residential development proposals must form a mix of market housing house types and sizes consistent with the latest Strategic Housing Market Assessment.

New residential development should contribute to the overall mix of housing in the locality, taking into account the current need, particularly for older people and first time buyers, current demand and existing housing stock.

The council will consider an alternative mix in the following circumstances where it is clearly demonstrated how the delivery of a mix consistent with the SHMA, or relevant update, is compromised:

- where the shape and size of the site precludes the delivery of a mix of housing;
- the location of the site, for example sustainable and very accessible sites within or close to Rugby town centre or the train station;

- sites with severe development constraints where the housing mix may impact on viability, where demonstrated through submission of viability appraisal;
- where a mix of housing would compromise the ability of the development to meet a specifically identified affordable or specialist housing need; and
- conversions, where the characteristics of the existing building prohibit a mix to be delivered.

Large development proposals will be expected to consider the contribution self-build can make to the mix and type of development

Policy H2: Affordable Housing Provision PLEASE NOTE: AS STATED AT PARAGRAPHS 4.4 OF THE REPORT TO FULL COUNCIL (19TH JULY 2016) PROPOSALS FOR AFFORDABLE HOUSING PROVISION ARE YET TO BE CONFIRMED. POLICY H2 AS IN THIS DOCUMENT IS SUBJECT TO CHANGE IN ADVANCE OF THE COMMENCEMENT OF PUBLIC CONSULTATION IN SEPTEMBER 2016.

FROM SEPTEMBER 26TH 2016 ONWARDS, PLEASE VISIT WWW.RUGBY.GOV.UK/PLANNING TO ACCESS THE PUBLICATION DRAFT PLAN PUBLISHED FOR PUBLIC CONSULTATION WHICH WILL CONTAIN THE CONFIRMED AND EVIDENCED PROPOSALS FOR AFFORDABLE HOUSING PROVISION.

All new housing developments providing X or more dwellings will be required to provide X% affordable housing. The mix of units within this percentage of provision must be in compliance with guidance contained within the Housing Needs SPD.

The target levels will be expected to be provided by all developments of 15 or more (net) dwelling units (including conversions and subdivisions) unless the local planning authority is satisfied by robust financial viability evidence that development would not be financially viable at the relevant target level. Such evidence will be required to be submitted with the planning application to justify any reduced levels of affordable housing provision proposed for assessment using an open-book approach and may be subject to independent assessment (e.g. by the Valuation Office Agency or equivalent).

Development should provide for the appropriate integration of affordable housing and market housing in order to achieve an inclusive and mixed community.

Further details of requirements are contained in the Housing Needs SPD which should be read in conjunction with this policy.

Policy H3: Housing for rural businesses

Proposals for a permanent dwelling, either by new build or conversion, for occupation by a person engaged in an agricultural operation, or another form of use that can only reasonably be located in the countryside, will only be supported if all of the following criteria are met:

- a) There is a clearly established functional need for a dwelling;
- b) The need relates to a full-time worker, or one who is primarily employed in the activity to which the application relates;
- c) The unit and the activity concerned, are currently financially sound, and have a clear prospect of remaining so; and

d) The functional need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable and available for occupation by the workers concerned.

The size of any such dwelling should be commensurate with the established functional requirement. Dwellings that are unusually large in relation to the needs of the unit, or unusually expensive to construct in relation to the income it can sustain in the long-term will not be permitted.

Any permission granted will be subject to an 'occupancy' condition. The variation or removal of such a condition will only be granted if its original purpose is obsolete and no longer required.

Proposals for the removal of occupancy conditions would only be permitted if the applicant can demonstrate that long term need for a Rural Workers Dwelling has ceased, and the Council is satisfied that the dwelling has been sufficiently marketed.

Policy H4: Rural Exceptions Sites

The development of affordable housing that meets the needs of local people, will be permitted as a Rural Exception Site adjacent to defined rural settlement boundaries, where development is normally resisted, if all the following criteria are met:

- a) It is clearly demonstrated that there is a local need for affordable housing which outweighs other policy considerations;
- b) It is demonstrated no suitable alternative sites exist within the defined settlement boundary;
- c) The development consists exclusively of affordable housing;
- d) Developments do not have an adverse impact on the character and/or appearance of settlements, their setting or the surrounding countryside; and
- e) Safeguards are in place to ensure homes remain affordable in perpetuity

In all cases arrangements for the management and occupation of dwellings must be made to ensure that all dwellings provided will be, and will remain available for occupancy by eligible local people at an affordable cost and at a range of tenures, both initially and in perpetuity.

In some circumstances a small proportion of open market housing may be allowed where it can be shown that the scheme will deliver significant affordable housing and viability is a key constraint.

Policy H5: Replacement Dwellings

Proposals for the replacement of dwellings in the Countryside and Green Belt, will be only be acceptable in line with national policy and provided all the following criteria are met:

- a) The replacement dwelling is not materially larger than the building it replaces and for Green Belt locations is of no more than a 30% increase on the original volume; unless national policy dictates;
- b) Unless exceptional circumstance dictates, the siting of the replacement dwelling should have no greater impact on landscape than the original. In Green Belt locations, the replacement dwelling must not have a greater impact on the openness of the Green Belt than the original; and

c) Residential is the lawful use of the existing building and the use has not been abandoned.

The removal of permitted development rights by condition may be included in any approval.

Policy H6: Specialist Housing

The Council will encourage the provision of housing to maximise the independence and choice of older people and those members of the community with specific housing needs.

When assessing the suitability of sites and/or proposals for the development of specialist housing such as, but not restricted to, residential care homes, extra care housing and continuing care retirement communities, the Council will have regard to the following:

- The need for the accommodation proposed, whereby the development contributes towards specialist housing need as identified within the Strategic Housing Market Assessment (SHMA);
- The ability of future residents to access essential services, including public transport, shops and appropriate health care facilities;

Large development proposals will be expected to consider opportunities for the provision of housing to meet the housing needs of older persons, including the provision of residential care homes.

The Council also expects developers, through the design of developments, to enable people to live to independently and safely in their own home for as long as possible, consistent with the aspiration of the Council and Warwickshire County Council.

The Council will consider the inclusion of conditions to ensure future occupation remains for the specialist housing need it was intended.

Economic Development

Policy ED1: Protection of Rugby's Employment Land

All employment sites, including the major investment site at Ansty Park, existing strategically significant sites, Core Strategy allocations, and new Local Plan allocations, as shown on the Proposals Map, will be retained for employment purposes in the following use classes: B1(a), B1(b), B1(c), B2 and B8. Proposals for new employment development (including expansion of established businesses and upgrading, improvement or redevelopment of existing premises) will be permitted within all employment areas subject to accordance with other policies in the Local Plan.

The intensification of existing employment sites will be supported subject to the consideration of their potential impacts to their surroundings against the relevant policies in the Local Plan and national policy, in particular those located in the Green Belt.

All land currently or last used for employment purposes will be protected where a site continues to make a viable contribution to economic development within the borough. However, in order to ensure land used for economic development continues to provide jobs in the local economy, where a site is proven to be no longer viable for employment uses, a proposal for change of use to a non B-use class may be considered acceptable.

For proposals that would involve the change of use or loss of any land used for employment purposes, evidence must be provided to demonstrate that the land or unit under consideration is no longer viable for a B-use class. It must be demonstrated that the site has been actively marketed according to the provisions of the explanatory text accompanying this policy, and for the following periods of time:

- On designated employment land / site: 24 months
- For any other B use class land / site / unit: 12 months

For any other B use class land / site / unit: 12 months

Evidence must demonstrate that there has been no serious interest shown by a B use class occupier during the relevant period of marketing, according to the provisions of the supporting text to this policy

Policy ED2: Employment development within Rugby urban area

New employment development within use classes B1(b), B1(c), B2 and B8 will be permitted within the urban area boundary, including new land within an amended urban area boundary following new allocations made in this Local Plan. Any such developments will be subject to compliance with all other relevant policies in the Local Plan and national policy.

Applicants will be required to demonstrate that any potential impacts on neighbouring land uses, particularly those especially sensitive to noise, visual amenity or air quality impacts arising from industrial uses are avoided, or where this is not possible, mitigated to an acceptable level.

New employment development within use class B1(a) Offices will be permitted in Rugby town centre subject to the provisions of the Town Centre policies in this Local Plan.

Office proposals will be permitted on designated employment sites outside the town centre where it is demonstrated that there are no sequentially preferable sites available, or where it can be demonstrated the office proposal is genuinely ancillary, in size and scale, to an existing employment use.

Policy ED3: Employment development outside Rugby urban area

Except for those sites allocated for employment purposes in this Local Plan, or with a current B use class, employment development will not be permitted outside the Rugby urban area except in the following circumstances:

- Conversion of a building for employment purposes, subject to its location and character, including historic or architectural merit, being suitable for the proposed use and it having been in existence for at least ten years;
- Redevelopment, at a similar scale, of an existing building or vacant part of an existing employment site for employment purposes, where this would result in a more effective use of the site;
- Small-scale expansion of an existing group of buildings for business uses where the site is readily and regularly accessible by means of transport other than the private car; or

- A building or structure related to agriculture, horticulture or forestry where it is genuinely required as an ancillary use for an existing rural employment development;

To be considered acceptable, any proposals meeting one of the above exceptions must also demonstrate compliance with all other relevant policies in the Local Plan, in particular where a proposal is located in the Green Belt.

All proposals will be subject to a thorough assessment to make sure their scale, nature and location are appropriate, including the need to:

- Limit the impact on local communities, the character of the local landscape, and the natural environment;
- Minimise impact on the occupiers and users of existing properties in the area;
- Avoid an increase in traffic generation that would have an adverse impact on the local road network, unless suitable mitigation to address the impact can be provided;
- Make provision for sustainable forms of transport wherever appropriate and justified; and
- Prioritise the re-use of brownfield land and existing buildings.

Policy ED4: The Wider Urban and Rural Economy

The following forms of development and uses are acceptable in principle both in and outside the urban area, subject to the content of other policies in the Local Plan.

Tourism and Leisure

- Small-scale tourism, visitor accommodation and leisure based uses, including sport and recreation, particularly those which would help to provide local employment and support rural services;
- Purpose-built visitor accommodation that is directly associated with and related to the scale and nature of an existing use;
- A small-scale expansion of an existing holiday caravan/chalet site where this would secure benefits to its function and appearance;
- Golf courses, golf driving ranges and ancillary facilities;
- New or extended, relative to the scale and nature of an existing development, garden centres and nurseries; or
- Equine and equestrian related activities, wherever practicable using existing buildings and structures.

Farm Diversification

Proposals that would support the ongoing viability of farms and other agricultural operations will be encouraged, subject to the following criteria being assessed and satisfied:

- Development on best quality agricultural land is avoided;
- Existing buildings and structures can be utilised as much as possible;

- The scale and nature of the development is integrated into the existing landscape, with minimal adverse impact to its character;
- The impact of the proposal on existing properties in the locality is minimal; and
- The generation of vehicular movements is acceptable, and suitable consideration is given to of access and parking.

Retail and Town Centre

Policy TC1: Development in Rugby Town Centre

Proposals for the redevelopment and refurbishment of the existing natural and built environment and public space, including new development proposals, within the town centre (as defined on the Town Centre Proposals Map) will demonstrate high quality design that complements and enhances the existing environment and townscape in a manner which contributes to local distinctiveness and a sense of place.

Policy TC2: Rugby Town Centre Comparison and Convenience Floorspace Requirements

New retail floorspace will be provided in Rugby Town Centre as set out below:

	2020	2025	2030
Convenience (net sqm)	266	515	732
Comparison (net sqm)	1508	4652	7850

To sustain and enhance the vitality and viability of the town centre, new proposals for footfall. Meeting the floorspace requirements will be permitted firstly within Primary Shopping Area (as defined in the Town Centre Proposal Map) followed by Edge-of-Centre locations, then Out-of-Centre sites that are in accessible locations, well connected to the town centre and capable of generating benefits for the centre's overall vitality and viability, through linked pedestrian trips and increased.

Throughout the lifetime of this Plan the Council will periodically update its Retail and Main Town Centre Uses Study in order that it can respond and continuously review its approach to the town centre and requirements for retail investment.

Policy TC3: Directing Development in the Town Centre

To sustain and enhance the vitality and viability of town centres, new proposals for town centre uses will be permitted firstly within Rugby Town Centre, (as defined in the town centre proposal map) followed by Edge-of-Centre locations.² Then, Out-of-Centre sites that are, or will be, well served by a choice of sustainable modes of transport and are close to the centre, or in relation to bulky goods retailing, are located immediately adjacent to existing retail warehousing.

All proposals for retail, office or leisure uses on sites not within Rugby Town Centre in excess of 500 sqm gross floorspace, including extension of existing units and variation of conditions, must be accompanied by an impact assessment. This assessment must meet the requirement of national guidance and established best practice and demonstrates that the proposal will not harm the vitality or viability of any nearby centres. All such proposals must also comply with the sequential approach, as set out in national guidance, to ensure that development is on the most central site available.

Policy TC4: Primary Shopping Area and Shopping Frontages

Within the Primary Shopping Area (PSA), as defined on the Town Centre Proposals Map, proposals for the development, redevelopment or change of use, will be permitted where the proposed ground floor use is to be changed to retail (use class A1).

Primary Shopping Frontage (PSF) Within the PSF, as defined on the Town Centre Proposals Map, the change of use of ground floor Class A1 shop premises to a complementary use will only be permitted where the proposed use would not undermine the retail function of the town centre and it maintains and enhances its vitality and viability.

The determination of each application will have regard to the following factors:

- The number and distribution of other existing and committed non-A1 uses within the defined primary shopping frontage should be no more than 40 % of the units within the PSF (including any premises subject to current Permitted Development changes of use);
- The location and prominence of the premises;
- Where applicable, the length of vacancy of the premises and evidence of marketing for the current permitted use;
- The nature and character of the proposed use; and
- The design of the shop-front.

Secondary Shopping Frontage (SSF)

Within the SSF, as defined on the Town Centre Proposals Map, proposals for main town centre uses (Use Class A1-A5, D1 and D2) will only be permitted where the proposed use maintains and enhances its vitality and viability.

Regard will also be had to the following factors:

- Coalescence and concentration of uses; and
- The effect on the amenity of other surrounding properties and uses.

Wider Town Centre Area

The Council will permit retail, business, leisure, arts, cultural and tourism development within wider town centre (areas not defined by PSF and SSF) provided:

- They will not harm the retail function and character of the PSA;
- They will not harm on the vitality and viability of the PSA; and
- Where retail uses (class A1) are proposed within the town centre, but outside of the PSA the applicant must demonstrate there are no suitable alternatives within or immediately adjacent to the PSA.

Residential development is encouraged within the Town Centre, providing it does not harm the retail function and character and its' vitality and viability. For all proposals, separate access arrangements

to the upper floorspace, which could be used for residential, community or employment use should not be eliminated.

Healthy, Safe and Inclusive Communities

Policy HS1: Healthy, Safe and Inclusive Communities

The potential for creating healthy, safe and inclusive communities will be taken into account when considering all development proposals.

Support will be given to proposals which:

- Provide homes and developments which are designed to meet the needs of older people and those with disabilities;
- Provide energy efficient housing to help reduce fuel poverty;
- Design and layout development to minimise the potential for crime and anti-social behaviour and improve community safety;
- Contribute to the development of a high quality, safe and convenient walking and cycling network;
- Contribute to a high quality, attractive and safe public realm to encourage social interaction and facilitate movement on foot and by bicycle;
- Seek to encourage healthy lifestyles by providing opportunities for formal and informal physical activity, exercise, recreation and play and, where possible, healthy diets;
- Improve the quality and quantity of green infrastructure networks and protect and enhance physical access, including public rights of way to open space;
- Deliver, or contribute to, new and improved health services and facilities in locations where they can be accessed by sustainable transport modes;
- Provide good access to local shops, employment opportunities, services, schools and community facilities, and;
- Do not involve the loss of essential community buildings and social infrastructure.

Policy HS2: Health Impact Assessments

Development proposals will be required to assess their impact on the capacity of existing health services and facilities. For all Use Class C2 developments (residential care homes and nursing homes) and Use Class C3 residential development more than 150 units this will take the form of a Health Impact Assessment, which will measure wider impacts on health and well-being and the demands that are placed upon the capacity of health services and facilities arising from the development. Where significant impacts are identified, planning permission will be refused unless infrastructure provision and/or funding to meet the health service requirements of the development are provided and/or secured by planning obligations.

The Borough Council will require Health Impact Assessments to be prepared in accordance with the advice and best practice for such assessments as published by the Department of Health and other

agencies, such the Coventry and Rugby Clinical Commissioning Group and Public Health Warwickshire.

Policy HS3: Protection and Provision of Local Shops, Community Facilities and Services

Proposals that would result in a significant or total loss of site and/or premises currently or last used for a local shop, post office, public house, community or cultural facility or other service that contributes towards the sustainability of a local settlement or the urban area will not be permitted except where the applicant demonstrates that:

- Alternative provision of equivalent or better quality, that is accessible to that local community, is available within the settlement or will be provided and made available prior to commencement of redevelopment; or
- There is no reasonable prospect of retention of the existing use as it is unviable as demonstrated by a viability assessment and all reasonable efforts to secure suitable alternative business or community re-use been made for a minimum of 12 months or a period agreed by the Local Planning Authority prior to application submission.

Provision of new community facilities and services will be supported if:

- It is readily accessible by a choice of means of transport, including by foot and cycle;
- The nature and the scale of the development would be commensurate with its function to provide facilities for the local resident population. The nature and scale of service provision will reflect and relate to the size and function of the individual settlement; and
- The development would not adversely affect the vitality and viability of the Town Centre or any planned town centre development

Policy HS4: Open Space and Recreation

A. Residential development of 10 dwellings and above, shall provide or contribute towards the attainment of the Council's open space standards set out below:

	Urban Area	Rural Area
Children's Play	0.2ha per 1,000 popn	0.2ha per 1,000 popn
Natural and Semi Natural Green Space	2.5ha per 1,000 popn	2.5ha per 1,000 popn
Parks and Gardens	1.5ha per 1,000 popn	1ha per 1,000 popn
Amenity Green Spaces	1.1ha per 1,000 popn	0.5ha per 1,000 popn
Allotments	0.8ha per 1,000 popn	0.65ha per 1,000 popn
Outdoor Sports Playing Pitches	Borough wide 0.93ha per 1,000 popn	

As a default, Rugby's average household size of 2.4 people per dwellings (Census 2011 or any subsequent update) should be used to identify the population of new developments and its subsequent open space requirement. Account will be taken of the existing open space provision within the ward the development proposals is located within (contained within Appendix 3). Contributions through CIL/S106 will be sought from developments where the proposal would further increase an existing deficit in provision or where the proposal will result in the provision standards not being met within the ward it is located within.

Dependent upon the size and layout of the development, the provision of open space, may be required on site or may form part of a contribution towards off site provision of either new or improved facilities. In such circumstances, off-site provision towards local facilities should be made in a location which adequately services the new development and a planning obligation may be used to secure this.

Developer contributions will also be spent on built recreation facilities where justified by an increase in population.

B. New open space should be accessible and of high quality, meeting the following criteria:

- Be appropriately maintained, if necessary, using developer contributions;
- Be secure and safe;
- Attractive in appearance;
- Enhance the natural and cultural environment;
- Conveniently accessed and facilitates access to other areas of open space, including the countryside;
- facilitates access by a choice of transport; and
- Avoid any significant loss of amenity to residents, neighbouring uses or biodiversity

C. Public open space assets identified within Open Space Audit evidence and/or defined on the Proposals Map will be protected from development unless:

- An assessment has been undertaken which has clearly shown the open space, building or land to be surplus to requirements; or
- it can be demonstrated that the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

6.37 the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Planning permission will be granted for development, which enhances the quality and accessibility of existing open space providing it accords with section B of this policy

Policy HS5: Traffic Generation and Air Quality

Any development that results in significant negative impacts on health and wellbeing of people in the area because of pollution, noise or vibration caused by traffic generation will not be permitted unless effective mitigation can be achieved.

Any development that results in significant negative impacts on air quality within identified Air Quality Management Areas or on the health and wellbeing of people in the area because of pollution should be supported by an air quality assessment and, where necessary, a mitigation plan to demonstrate practical and effective measures to be taken to avoid the adverse impacts.

All measures required in the Policy should take full account of the cumulative impact of all development proposed in this Plan (and any other known developments) on traffic generation and air quality.

Natural Environment

Policy NE1: Protecting Designated Biodiversity and Geodiversity Assets

The Council will protect designated areas and species of national and local importance for biodiversity and geodiversity as set out below.

Development that is likely to result in a significant effect, either alone or in combination, on an International or European nature conservation designation, or a site proposed for such designation, will need to satisfy the requirements of the Habitat Regulations.

Development likely to result in the loss, deterioration, degradation or harm to habitats or species of importance to biodiversity or geological conservation interests, either directly or indirectly, will not be permitted unless:

- the need for, and benefits of, the development in the proposed location outweigh the adverse effect on the relevant biodiversity interest;
- it can be demonstrated that it could not reasonably be located on an alternative site that would result in less or no harm to the biodiversity interests; and
- measures can be provided (and secured through planning conditions or legal agreements), that would avoid, mitigate against or, as a last resort, compensate for the adverse effects likely to result from development.

The habitats and species of importance to biodiversity and sites of geological interest considered as part of this policy comprise:

- Sites of Special Scientific Interest (SSSIs);
- Legally protected species;
- National Nature Reserves (NNRs) and Local Nature Reserves (LNRs);
- Local Wildlife Sites (LWS) and Local Geological Sites (LGS)
- Habitats and species of principal importance for the conservation of biodiversity in England (Sections 40 and 41 of the NERC Act 2006);
- Priority habitats and species listed in the national and local Biodiversity Action Plans; and;
- Trees, woodlands, ancient woodland (including semi-natural and replanted woodland), aged and veteran trees, and hedgerows.

The level of protection and mitigation should be proportionate to the status of the habitat or species and its importance individually and as part of a wider network. Development proposals should seek to avoid adverse effects on SSSIs. Development adversely affecting a SSSI, either directly or indirectly, will only be permitted in exceptional circumstances where the benefits of development clearly outweigh the likely impacts on the site and any broader impacts on the national networks of SSSIs.

Development adversely affecting a Local Site (LNR, LWS or LGS) will only be permitted either where it can be demonstrated that the benefits of the development clearly outweigh the impacts on the site. Development proposals impacting on potential local wildlife sites will be expected to assess the site

against the 'Green Book'³ criteria to determine the status of the site and to ascertain whether the development clearly outweighs the impacts on the site.

All development proposals in the proximity of ancient woodland shall have regard to the 'Standing Advice for Ancient Woodland and Veteran Trees' published by Natural England. As a starting principle, development must be kept as far away as possible from ancient woodland. The necessary width of any buffer zone will depend upon local circumstances and the type of development. Buffer zones should be retained in perpetuity and allowed to develop into semi-natural habitats. Section 6 of the Standing Advice includes guidance on mitigation measures, including buffers.

All proposals likely to impact on the above sites will be subject to an Ecological Assessment. The Ecological Assessment should include due consideration of the importance of the natural asset, the nature of the measures proposed (including plans for long term management) and the extent to which they avoid and reduce the impact of the development.

Policy NE2: Biodiversity

New development will be permitted if it protects, enhances and/or restores habitat biodiversity. Development proposals must:

- protect or enhance biodiversity assets and secure their long-term management and maintenance;
- avoid negative impacts on existing biodiversity; and
- lead to a net gain of biodiversity, where possible, by means of an approved ecological assessment of existing site features and development impacts;

Where a development will have a negative impact on a biodiversity asset, mitigation will be sought in line with the mitigation hierarchy. Impacts should be avoided and if this is not possible, mitigated. Where there would be a residual impact on a habitat or species and mitigation cannot be provided on site in an effective manner, developers will be required to offset the loss by contributing to appropriate biodiversity projects elsewhere in the area. Where an impact cannot be fully mitigated or, as a last resort, compensated for, then planning permission will be refused.

Proposals which will improve the environment by reclaiming and improving derelict, contaminated, vacant or unsightly land for biodiversity value will be supported.

Policy NE3: Blue and Green Infrastructure Policy

The Council will work with partners towards the creation of a comprehensive Borough-wide Strategic GI Network which is inclusive of the Princethorpe Woodland Biodiversity Opportunity Areas (also known as the Princethorpe Woodlands Living Landscape), as shown indicatively on the Green Infrastructure Proposal Map. This will be achieved through the following:

- the protection, restoration and enhancement of existing GI assets within the network as shown on the proposals map; and
- the introduction of appropriate multi-functional linkages between existing GI assets

Where appropriate new developments must provide suitable GI linkages throughout the development and link into adjacent strategic and local GI networks or assets where present.

Where such provision is made a management plan should be produced as part of the planning application demonstrating the contribution to the overall achievements of the multi-functional strategic GI network.

Policy NE4: Landscape Protection and Enhancement

New development which positively contributes to landscape character will be permitted.

Development proposals will be required to demonstrate that they:

- integrate landscape planning into the design of development at an early stage;
- consider its landscape context, including the local distinctiveness of the different natural and historic landscapes and character, including tranquillity;
- relate well to local topography and built form and enhance key landscape features, ensuring their long-term management and maintenance;
- identify likely visual impacts on the local landscape and townscape and its immediate setting and undertakes appropriate landscaping to reduce these impacts;
- aim to either conserve, enhance or restore important landscape features in accordance with the latest local and national guidance;
- avoid detrimental effects on features which make a significant contribution character, history and setting of an asset, settlement, or area;
- address the importance of habitat biodiversity features, including aged and veteran trees, woodland and hedges and their contribution to landscape character, where possible enhancing and expanding these features through means such as buffering and reconnecting fragmented areas; and
- are sensitive to an area's capacity to change, acknowledge cumulative effects and guard against the potential for coalescence between existing settlements

Sustainable Design and Construction

Policy SDC1: Sustainable Design

All development will demonstrate high quality, inclusive and sustainable design and will only be allowed where proposals are of a scale, density and design that would not cause any material harm to the qualities, character and amenity of the areas in which they are situated.

Factors including the massing, height, landscape, layout, materials and access should also be a key consideration in the determination of planning applications.

The Council will consider appropriate housing density on a site by site basis with decisions informed by local context of the area in terms of design considerations, historic or environmental integration, local character or identified local need.

Proposals for new development will ensure that the amenities of existing and future neighbouring occupiers are safeguarded.

Proposals for housing and other potentially sensitive uses will not be permitted near to or adjacent sites where there is potential for conflict between the uses, for example, an existing waste management site. Such proposals must be accompanied by supporting information demonstrating that the existing and proposed uses would be compatible and that the proposal has addressed any potential effects of the existing use on the amenity of the occupiers of the proposed development.

Developers should provide adequate off-street storage space for wheeled bins to serve all new residential properties, including conversions. This requirement is particularly important in designated Conservation Areas where the visual importance of the street scene has been acknowledged and there is a duty for the area's character and appearance to be protected and enhanced. Provision can be in the form of storage space integral to the design of the property, dedicated space externally, in a communal storage area, or in underground waste storage systems.

Proposals relating to the enhanced energy efficiency of existing buildings will be supported in accordance with the most up to date national regulations.

Policy SDC2: Landscaping

The landscape aspects of a development proposal will be required to form an integral part of the overall design. A high standard of appropriate hard and soft landscaping will be required. All proposals should ensure that:

- Important site features have been identified for retention through a detailed site survey;
- The landscape character of the area is retained and, where possible, enhanced;
- Features of ecological, geological and archaeological significance are protected and opportunities for enhancing these features are utilised
- Opportunities for utilising sustainable drainage methods are incorporated;
- New planting comprises native species which are of ecological value appropriate to the area
- In appropriate cases; there is sufficient provision for planting within and around the perimeter of the to minimise visual intrusion on neighbouring uses the countryside; and
- Detailed arrangements are incorporated for the long-term management and maintenance of landscape features.

Policy SDC3: Protecting and enhancing the Historic Environment

Development will be supported that sustains and enhances the Borough's heritage assets including listed buildings, conservation areas, historic parks and gardens, archaeology, historic landscapes and townscapes. Development affecting a designated or non-designated heritage asset and its setting will be expected to make a positive contribution to its character, appearance and significance.

To conserve and enhance the Borough's heritage assets, development proposals must:

a) Understand the Asset

Applications affecting the significance of a heritage asset will be required to provide sufficient information and assessment (such as desk-based appraisals, field evaluation, and historic building reports) of the impacts of the proposal on the significance of heritage assets and their setting to demonstrate how that proposal would contribute to the asset's conservation.

The Warwickshire Historic Environment Record, the Borough's Conservation Area Character Appraisals and Management Plans, the Local List of non-designated heritage assets, the Warwickshire Historic Towns Appraisal and Historic Landscape Characterisation Study are examples of sources of information that will be used to inform the consideration of future development including potential conservation and enhancement measures.

Applicants should take account of the heritage assets communal, aesthetic, evidential and historical values.

b) Conserve the Asset

Great weight will be given to the conservation of the Borough's heritage assets. Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals causing harm will be weighed against the public benefits of the proposal; whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long-term use of the asset.

Scheduled monuments and other non-designated archaeological sites of equivalent importance should be preserved in situ.

Policy SDC4: Sustainable Buildings

Residential buildings All new dwellings shall meet the Building Regulations requirement of 110 litres of water/person/day unless it can be demonstrated that it is financially unviable.

Non-residential buildings

All non-residential development over 1000 sq. m is required to achieve as a minimum BREEAM standard 'very good' (or any future national equivalent) unless it can be demonstrated that it is financially unviable.

In meeting the carbon reduction targets set out in the Building Regulations and BREEAM standards the Council will expect development to be designed in accordance with the following energy hierarchy:

- Reduce energy demand through energy efficiency measures.
- Supply energy through efficient means (i.e. low carbon technologies).
- Utilise renewable energy generation.

Applicants will be required to submit a *Sustainable Buildings Statement* to demonstrate how the requirements of Climate Change policies in this Plan have been met.

Actual provision will be determined through negotiation, taking account of individual site characteristics and issues relating to the viability of development

Policy SDC5: Flood Risk Management

A sequential approach to the location of suitable development will be undertaken by the Council based on the Environment Agency's flood zones as shown on the latest Flood Map for Planning and Strategic Flood Risk Assessment (SFRA). This will steer new development to areas with the lowest probability of flooding, so to avoid flood risk to people and property and manage any residual risk.

If development in areas at risk of flooding is the only option following the application of the sequential test, it will only be permitted where the following criteria are met:

- The vulnerability classification of the development is appropriate to the level of flood risk associated with its location with reference to the Environment Agency's Flood Map, Rugby Borough Council's Strategic Flood Risk Assessment (SFRA) flood zone maps and Table 3 of the NPPF Planning Practice Guide: Flood Risk and Climate Change;
- It is provided with the appropriate flood risk mitigation measures (including suitable flood warning and evacuation procedures) which can be maintained for the lifetime of the development;
- It does not impede flood flows, does not increase the flood risk on site or elsewhere or result in a loss of floodplain storage capacity;
- All opportunities offered by the development to reduce flood risk elsewhere must be taken, including creating additional flood storage and reducing risk of flooding from the sewer network.
- In the case of dwellings, it is evident that as a minimum, safe, dry pedestrian access would be available to land not at high risk, and; ☒ in the case of essential civil infrastructure, access must be guaranteed and must be capable of remaining operational during all flooding events.

If following application of the sequential test it is not possible or consistent with wider sustainability objectives for the development to be located in zones with a lower probability of flooding, then the Exception Test can be applied as set out in the NPPF. Where in the wider overall interest, development is supported as an exception applicants will need to demonstrate that it strictly complies with criteria b, c, d, e and f of the policy.

Land that is required for current and future flood management will be safeguarded from development.

Applicants will be required to demonstrate how they comply with this policy by way of a site-specific Flood Risk Assessment (FRA), appropriate to the scale and nature of the development proposed, where the development is:

- In Flood Zone 2 and 3 as defined by the Environment Agency's Flood Map or Rugby Borough SFRA;
- Minor development and change of use more than 1ha and in Flood Zone 1;
- Within 20m of a watercourse;
- Adjacent to, or including, any flood bank or other flood control structure; or

- Within an area with critical drainage problems.

The FRA must assess the flood risk from all sources and identify options to mitigate the flood risk to the development, site users and surrounding area.

Policy SDC6: Sustainable Urban Drainage

Appropriate Sustainable Urban Drainage Systems (SUDS) are required in all developments. Such facilities should preferably be provided on-site or, where this is not possible, close to the site, and:

- Be designed and located sensitively to integrate with Green Infrastructure functions;
- Promote enhanced biodiversity;
- Improve water quality;
- Increase landscape value; and
- Provide good quality open spaces.

Infiltration SUDs is the preferred way of managing surface water. The developer will carry out infiltration tests where possible and a groundwater risk assessment to ensure that this is possible and that groundwater would not be polluted. Where it is proven that infiltration is not possible, surface water should be discharged into a watercourse (in agreement with the Lead Local Flood Authority (LLFA)) at pre-development greenfield run off rates or into a surface water sewer if there is no nearby surface water body.

In exceptional circumstances, where a sustainable drainage system cannot be provided, it must be demonstrated that:

- An acceptable means of surface water disposal is provided which does not increase the risk of flooding or give rise to environmental problems and improves on the current situation, and;
- Contributions will be made to off-site SUDS schemes if located in an area known to suffer surface water flooding the development should seek to offer a strategic solution.

The re-use and recycling of surface water and domestic waste water within new development will be encouraged.

POLICY SDC7: Protection of the Water Environment and Water Supply

Developers will be expected to ensure that there is adequate water supply to serve existing and proposed developments by:

- Minimising the need for new infrastructure by directing development to areas where there is a guaranteed and adequate supply of water having due regard to Severn Trent's Water Resource Management Plan and Strategic Business Plan as well as the findings of the Water Cycle Study; and
- In accordance with the Water Framework Directives Objectives, ensuring development does not affect the waterbodies' ability to reach good status or potential as set in the River Severn Basin Management Plan (RBMP).

Development will not be permitted where proposals have a negative impact on water quality, either directly through pollution of surface or ground water, or indirectly through the overloading of

Wastewater Treatment Works. Prior to any potential development, consultation must be held with Severn Trent Water to ensure that the required wastewater infrastructure is in place in sufficient time.

Development will not be permitted where the sensitivity of the groundwater environment, or the risk posed by the type of development is deemed to pose an unacceptable risk of pollution of the underlying aquifer.

Policy SDC 8: Supporting the provision of renewable energy and low carbon technology

Proposals for new low carbon and renewable energy technologies (including associated infrastructure) will be supported in principle subject to all of the following criteria being demonstrated:

- The proposal has been designed, in terms of its location and scale, to minimise any adverse impacts on adjacent land uses and local residential amenity;
- The proposal has been designed to minimise the impact (including any cumulative impacts) on the natural environment in terms of landscape, and ecology and visual impact;
- There is no unacceptable impact on heritage assets and their setting;
- The scheme maximises appropriate opportunities to address the energy needs of neighbouring uses (for example linking to existing or emerging District Heating Systems);
- For biomass, it should be demonstrated that fuel can be obtained from a sustainable source and the need for transportation will be minimised;
- For proposals for hydropower the application must be supported by a Flood Risk Assessment and Water Framework Directive assessment;
- For wind turbines, the proposed development site is identified as suitable for wind energy development in a Local or Neighbourhood Plan and;
- Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

Policy SDC 9: Broadband and mobile internet

Developers of new developments (residential, employment and commercial) will be expected to facilitate and contribute towards the provision of broadband infrastructure suitable to enable the delivery of broadband services across Rugby Borough to ensure that the appropriate service is available to those who need it.

Developers must make sure that broadband services that meet the ambitions of the Digital Communications Infrastructure Strategy and the European Digital Agenda are available, wherever practicable, to all residents of the development at market prices and with a full choice of all UK service providers.

Developers are required to work with a recognised network carrier to design a bespoke duct network, wherever practicable, for the development

Other forms of infrastructure, such as facilities supporting mobile broadband and Wi-Fi, should be included, wherever possible and viable

Delivery

Policy D1: Transport

Development will be permitted where sustainable modes of transport are prioritised and measures designed to mitigate transport impacts arising from either individual development proposals or cumulative impacts caused by a number of proposals, are provided.

All large-scale developments which result in the generation of significant traffic movements, should be supported by Transport Assessment and where necessary a Travel Plan, to demonstrate practical and effective measures to be taken to avoid the adverse impacts of traffic. It must consider:

- The impact of the proposal upon existing infrastructure;
- How the site will connect safely to public transport;
- Safe and convenient access to pedestrians and cyclists;
- Potential impact of heavy goods vehicles accessing the site, including during construction.
- The entering into of bus and/or freight partnerships with the County Council and/or third parties;
- Smaller scale development must be accompanied by a Transport Statement.

Policy D2: Parking facilities

Planning permission will only be granted for development incorporating satisfactory parking facilities including provision for motor cycles, cycles and for people with disabilities, (or impaired mobility), based on the Borough Council's standards included at Appendix 5 of this Plan.

Policy D3: Infrastructure and Implementation

The scale and pace of new development will be dependent on sufficient capacity being available in existing infrastructure to meet the demands of new development. Where this cannot be demonstrated permission for new development will only be granted where additional capacity can be released through better management of existing infrastructure, or through the provision of new infrastructure.

Developer contributions may be sought to fund new infrastructure and a programme of delivery will be agreed before development can take place.

Policy D4: Planning Obligations

Where it is necessary to mitigate against the impact of a development proposal; planning permission will only be granted when a legal agreement, or planning obligation is entered into with the Council, in line with the Community Infrastructure Levy Regulations 2010.

In the first instance infrastructure contributions will be sought “on site”. However, where this is not possible an off-site (commuted) contribution will be negotiated.

The type, amount and phasing of contributions sought from developers will be related to the form and scale of the development, its potential impact on the site and surrounding area and the levels of existing infrastructure and community facilities. The financial viability of the development will also be a consideration.

Policy D5: Airport flightpath safeguarding

The Council will safeguard the Coventry airport flight paths and the Daventry (Pailton) radio technical site as indicated in Appendix 6, in accordance with the requirements of the civil aviation authority.

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