



**RUGBY BOROUGH LOCAL PLAN
ISSUES AND OPTIONS:
OCTOBER 2023**



Caldecott Park, Rugby

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2. INTRODUCTION

WHAT IS A LOCAL PLAN?

- 2.1. Local plans set out the policies that councils use to decide applications for planning permission. These policies are often called ‘development management policies’. Applications are made for planning permission to carry out building work or a material change to the use of land or buildings.
- 2.2. A planning application does not need to be made for some types of building work and changes of use which are granted deemed planning permission by government legislation. These are called ‘permitted development’. More details about permitted development can be found on this website: <https://www.planningportal.co.uk/permission/responsibilities/planning-permission/permitted-development-rights> .
- 2.3. Alongside development management policies, local plans set out how many new homes and how much more land for business uses is expected to be needed. Plans show how those needs will be met, usually from a mix of land which already has planning permission and new site allocations (land earmarked for development). Plans also show the infrastructure that will be needed to support development in the area and how this can be paid for. Infrastructure includes (amongst other things) new schools, green spaces, flood defences, and upgrades to roads and public transport.
- 2.4. The plan needs to look at least 15 years ahead in planning for new homes and other uses.
- 2.5. Some plan policies are shown on the policies map, which goes with the plan.

WHAT DOESN'T A LOCAL PLAN DO?

- 2.6. In Warwickshire there are two levels of local government. Rugby Borough Council is the lower tier and decides most planning applications and produces the local plan. Warwickshire County Council is the upper tier and is responsible for planning for transport, schools, waste and minerals. Warwickshire County Council is also responsible for planning for enhancements to the natural environment, through the Nature Recovery Network.
- 2.7. Local plans are not transport plans. Local plans show specific transport upgrades that are needed to support new homes or employment development, but they do not set out a plan for the transport network.
- 2.8. Warwickshire County Council is producing a new Local Transport Plan (LTP4), the latest version can be accessed here: <https://ask.warwickshire.gov.uk/insights-service/local-transport-plan/>. Underneath this strategic document, a Rugby Transport Plan will be developed. Any new Local Plan will need to be considered alongside this document.
- 2.9. Similarly, local plans do not deliver infrastructure. Infrastructure planning in England is complex and fragmented. Infrastructure is delivered by a combination of private companies (water companies, electricity companies, bus companies, rail franchises, broadband providers) and national government agencies (National Highways, Network Rail, and The Environment

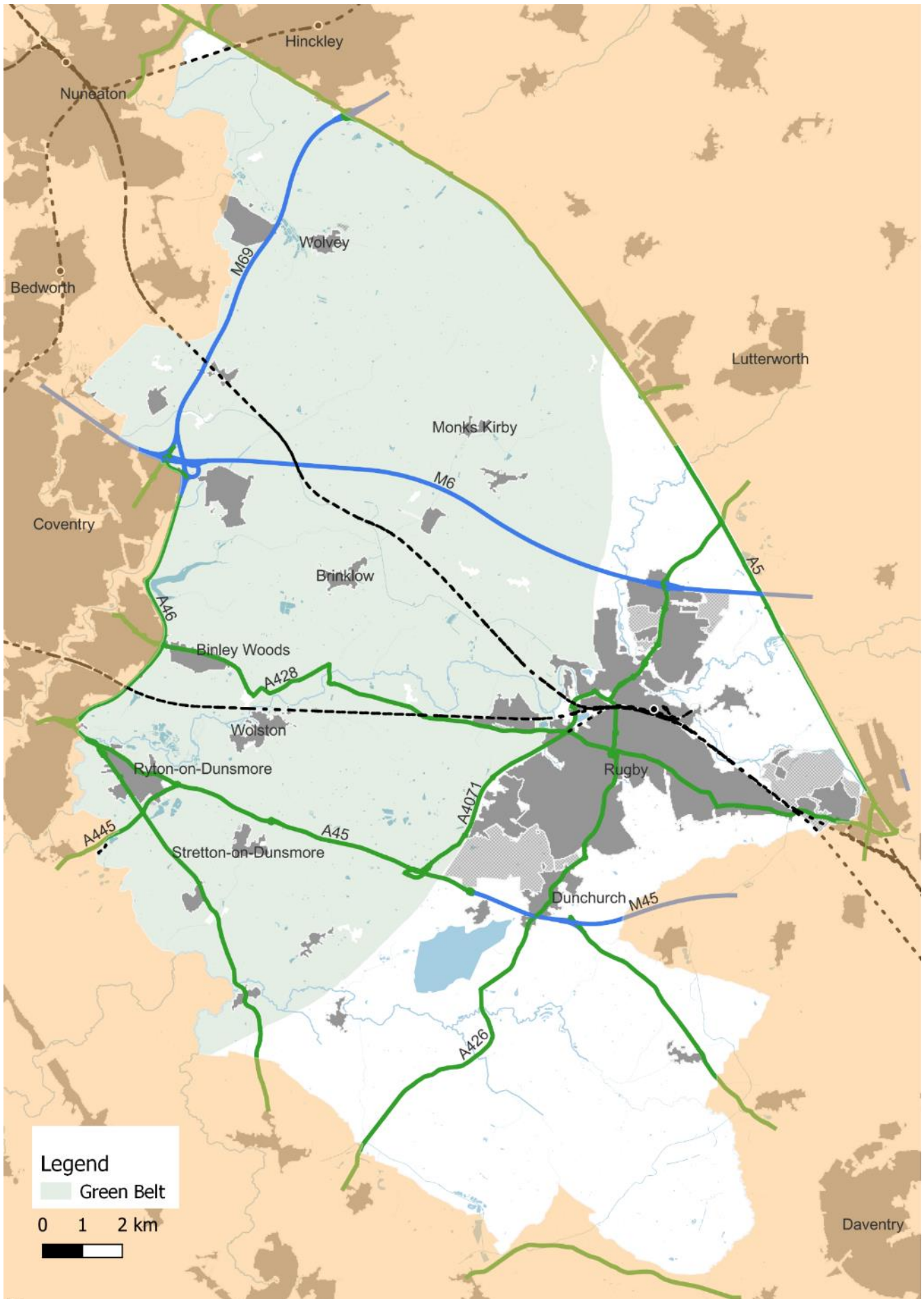
Agency), alongside Warwickshire County Council.

- 2.10. A linked point is that local plans do not have an implementation budget. Local plans are implemented by private developers and infrastructure providers. Infrastructure can be part funded by developers' contributions but is also reliant on national government funding. Funding for infrastructure is controlled by central government and is often distributed through competitive bidding processes.
- 2.11. In this context, the role of local plans is to show in broad terms the infrastructure that is needed to support new development in the area and how that infrastructure could be delivered.
- 2.12. Finally, local plans do not make detailed decisions about the design of individual buildings and spaces. These more detailed decisions are considered at the planning application stage. Local plans can, however, set design policies and be supported by design guides or codes and this is the preferred mechanism by which such design policies can be delivered.

WHAT IS THE CURRENT LOCAL PLAN FOR RUGBY BOROUGH?

- 2.13. The current Rugby Borough Local Plan 2011-2031 can be accessed on the council's website: https://www.rugby.gov.uk/info/20004/planning_strategy/348/local_plan_2011-2031.
- 2.14. Alongside the local plan, there are several neighbourhood plans which can also be accessed on the council's website: https://www.rugby.gov.uk/homepage/49/neighbourhood_planning.

[[Can we list the neighbourhood plans in this document for completion's sake.]]
- 2.15. Warwickshire County Council has produced minerals and waste plans which cover Rugby Borough: <https://www.warwickshire.gov.uk/planningstrategies>.
- 2.16. The current Rugby Borough Local Plan 2011-2031 will remain in force until the new local plan is adopted by the council and comes into effect.
- 2.17. Neighbourhood plans that have been made will continue to be in place after the new local plan is adopted. However, parts of neighbourhood plans may be superseded by the new local plan.



Rugby Borough

WHY ARE WE UPDATING OUR LOCAL PLAN?

- 2.18. Councils are required by law to complete a review their local plans every five years starting from the date of plan adoption. The current Rugby Borough Local Plan 2011-2031 was adopted in June 2019. Therefore, the latest date for completing a review is June 2024.
- 2.19. The purpose of a review of a local plan is to decide whether there is a need to update its policies. Several factors are relevant in deciding whether policies have become ‘out of date’ and need updating. These include changes to national planning policy and evidence of changes to local circumstances. Policies are not automatically out of date after five years. However, the government’s Planning Practice Guidance says that most plans will need updating in full or in part at least every five years.
- 2.20. On 14 December 2022 Rugby Borough Council decided to go ahead with a full update of the local plan’s policies. The report to council found several changes telling in favour of a plan update:
- the declaration of a climate change emergency by the council,
 - the introduction of the Environment Act 2022 and its requirement for biodiversity net gain,
 - new evidence of future needs for homes and employment land, particularly for warehousing uses, through the Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022,
 - the need for policies to support the regeneration of Rugby town centre.
- 2.21. Additionally, the report identified the risk that, if the policies are not updated, there will be more planning applications for development that is not in line with the plan. Such applications could be backed by arguments that the plan’s policies are out of date.
- 2.22. Further reasons for updating the plan are the need for policy on houses in multiple occupation and the need to identify sites to meet Gypsy and Traveller accommodation needs.
- 2.23. Because the policies identified as needing updating included ‘strategic’ policies of the plan and cover a range of areas, it was decided to go ahead with a full rather than partial update to the plan.

WHAT ABOUT CHANGES TO NATIONAL POLICY?

- 2.24. We are producing our new local plan against a backdrop of changing national planning law and policy. The Levelling Up and Regeneration Bill will change the system of producing local plans and the government is updating its national planning policy. More details can be found here: <https://bills.parliament.uk/bills/3155> and here: <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy>
- 2.25. We are following closely and responding to those changes.

2.26. Among the changes is the proposed introduction of standard national development management policies which will apply across the country. There will also be an updated National Planning Policy Framework.

WHAT IS THE TIMETABLE FOR PRODUCING THE NEW LOCAL PLAN AND WHAT HAPPENS NEXT?

2.27. The full timetable for producing the new local plan is set out in the council's Local Development Scheme, which can be accessed here:
https://www.rugby.gov.uk/downloads/download/101/local_development_scheme

2.28. This consultation is the first step in that process.

THE STRUCTURE OF THIS DOCUMENT

2.29. The rest of this document is about seven most significant planning issues facing the borough:

- [Land for employment uses](#)
- [Town centre regeneration](#)
- [Pitches for gypsies and travellers](#)
- [Houses in multiple occupation](#)
- [Climate change policies](#)
- [Design coding and guidance](#)
- [Land for housebuilding](#)

2.30. For each of these issues we explain the issue, show the options open to us in the new local plan, and ask for your views. We will use your views to shape our new policies.

SUSTAINABILITY APPRAISAL SCOPING REPORT

2.31. Alongside our local plan issues and options, we are also consulting on our sustainability appraisal scoping report. This can be accessed here: <https://www.rugby.gov.uk/localplan>.

2.32. This is the first stage of the sustainability appraisal of our new plan. The sustainability appraisal will consider the potential social, environmental and economic effects of the plan.

CALL FOR SITES

2.33. Alongside this consultation we are asking landowners and developers to put forward their land for consideration for allocation in the new local plan. You do this by completing our call for sites form here: <https://www.rugby.gov.uk/localplan> and emailing it to localplan@rugby.gov.uk

2.34. After the consultation closes, we will produce our housing and economic land availability assessment ('HELAA'). This is the first stage of assessing sites for allocation in the new plan..

HOW DO I RESPOND?

2.35. Responses to this consultation must be received no later than 2nd February 2024. You can respond on our website at the following address: <https://www.rugby.gov.uk/localplan> .

2.36. Alternatively, you can respond by email to localplan@rugby.gov.uk or by post to:

Development Strategy
Rugby Borough Council
Town Hall
Evreux Way Rugby
CV21 2RR



mtc

mtc Reception

Manufacturing Technology Centre, Ansty Park

3. LAND FOR EMPLOYMENT USES

WHAT IS THE ISSUE?

- 3.1. We now have new, longer-term projections for the need for land for employment uses (offices, research and development, industrial and warehousing).
- 3.2. We need to think about how we can meet the projected need for employment land to allow the borough's economy to continue to grow.

THE DETAIL

- 3.3. The Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022 https://www.rugby.gov.uk/directory_record/55399/coventry_and_warwickshire_housing_and_economic_development_needs_assessment_hedna_2022/category/86/reviews_studies_and_assessments shows three components of future need for employment land. These are shown in the table below:

Type of employment land	Land needed 2021-2041 (in hectares)	Land needed 2021-2050 (in hectares)
Gross requirement for strategic warehousing land across Coventry and Warwickshire (this means land for warehouses of over 9,000m ² in floor area)	551ha	735ha
Net need for office land (Rugby Borough only)	5.2ha (4.2ha with hybrid working)	6.5ha
Gross requirement for industrial land (Rugby Borough only) (this includes smaller warehouses of up to 9,000m ² in floor area)	150.5ha	218.2ha

- 3.4. The projected requirement for industrial land (which includes smaller warehouses) is a *gross* requirement. It is based on projecting forward past trends for gross industrial and smaller warehouse floorspace delivery. This means that not all this requirement will need to be met on new employment land. Some of the requirement will be met by redeveloping land that is already in industrial use.
- 3.5. Similarly, the requirement for strategic warehousing land is a gross requirement. This requirement is calculated as follows:
 - A continuation of past (2011-2019) trends for large warehouse building in the sub-region for the first ten years of the projection period (2021-2031).
 - For the rest of the projection period the requirement for warehousing is modelled based on a combination of:
 - The projected need to replace existing warehouses when they become obsolete (replacement demand); and

- The projected growth in freight traffic in the region and the warehouses needed to handle that traffic.
- 3.6. As with the industrial land requirement, the requirement for large warehousing will in part be met by redeveloping existing land in warehousing use.
 - 3.7. The method for projecting the future need for office space is different. This uses forecast of the number of people that will be employed in office-based jobs in future. It then converts the number of employees into a floorspace requirement, using average employment densities for office buildings. The floorspace requirement is then converted into a land requirement.
 - 3.8. The requirement for office space is calculated using 2019 (pre-pandemic) rates of homeworking. The HEDNA also includes a scenario whereby home or hybrid working persists in office-based sectors and this reduces the requirement for office floorspace by 30%. This would reduce the requirement for office land (including margin) for 2021 to 2041 from 5.2ha to 4.2ha.
 - 3.9. At the time of writing, hybrid working appears to have become embedded for office jobs. This means that the hybrid working scenario for future office need may be more realistic. The requirement for office space, as it is based on labour demand, is a net need. That means that it would need to be met from added floorspace, rather than the redevelopment or refurbishment of existing offices.

WHAT TYPE OF EMPLOYMENT LAND DO WE NEED?

- 3.10. The HEDNA doesn't split the need for industrial and smaller warehousing land in the borough into different types of employment land. It does, however, recommend that, because of the high demand for warehousing land, we should make specific site allocations for B2 industrial and light industrial (now use class E(g)(iii)) land.
- 3.11. Additionally, the feedback we have received from local businesses is that there is a shortage of 'grow on space' in the borough to allow existing businesses to expand and incubator space for new start-ups.
- 3.12. Successful business clusters have developed in the borough, in particular the Manufacturing Technology Centre and associated manufacturing uses at Ansty Park. However, there is an impetus to diversify the borough's economy and support the development of local skills to meet future business needs.
- 3.13. Alongside any review of the Local Plan, Rugby Borough Council is producing a new economic strategy which will inform the local plan. As part of this Economic Strategy, we will consult with the Coventry and Warwickshire Chamber of Commerce, the Coventry and Warwickshire Growth Hub and Warwickshire County Council, West Midlands Combined Authority and other partners and representatives of the business community to refine our understanding of the employment land we need.

WHY IS THERE HIGH NEED FOR WAREHOUSES?

- 3.14. Retailers and manufacturers have moved to 'just in time' inventory management, whereby

goods are received from suppliers when they are needed rather than being stored on site. Supply chains have become increasingly complex and international. These factors increase the need for warehousing space. At the same time, online retail has rapidly grown as a percentage of all retail sales from 2.7% in January 2007 to 26.6% in January 2023. (<https://www.ons.gov.uk/businessindustryandtrade/retailindustry/timeseries/j4mc/drsi>).

- 3.15. These changes have driven rapid growth in the need for warehouse floorspace. Savills estimates that warehouse floorspace in the UK grew by 32% between 2015 and 2021.
- 3.16. Rugby Borough sits at within the so-called 'Golden Triangle' for distribution. This is an area of the East and West Midlands that has 35% of all UK warehouse floorspace. The Golden Triangle is favoured by transport and distribution businesses because it allows efficient access to large parts of the country via the motorway and rail network.
- 3.17. The Office for National Statistics ranked Rugby Borough as the local authority district in England and Wales with the highest proportion of business units used for transport and storage. Transport and storage made up 17.5% of business units in the borough in 2021. <https://www.ons.gov.uk/businessindustryandtrade/business/activitysizeandlocation/articles/heriseoftheukwarehouseandthegoldenlogisticstriangle/2022-04-11>
- 3.18. Nearby districts of North Northamptonshire (5), West Northamptonshire (7) and Nuneaton and Bedworth (15) also feature in the top twenty local authority districts with the highest proportion of business premises used for transport and storage.
- 3.19. The 2021 Census showed that 3.8% of people aged 16 years and over in employment in Rugby Borough worked in warehousing and support activities for transportation. This is the second highest proportion of any local authority district in England and Wales, after Spelthorne District which borders Heathrow Airport.
- 3.20. Although Rugby and the Midlands are an attractive location for warehousing space, it is important to recognise that a sizeable proportion of our existing industrial land is used for manufacturing and research and development uses. This is true, for example, of GE Power Conversion, Ansty Park and for part of Prologis Park at Ryton.
- 3.21. It is the Council's expectation that the Economic Strategy will support the expansion of manufacturing, research and development employment land. Therefore, additional site allocations are likely to be necessary to enable this need to be met and for Rugby to continue to be able to attract the next generation of these skilled businesses and jobs.

WHY DO WE NEED TO PLAN FOR LARGE WAREHOUSES?

- 3.22. National government policy states that local authorities must plan for objectively assessed needs for housing and other uses. This includes warehouses. Local plans must be consistent with national policy.
- 3.23. National policy in the National Planning Policy Framework (NPPF) says local authorities in their plans should "address the specific locational requirements of different sectors. This includes making provision for (...) storage and distribution operations at a variety of scales and in suitably accessible locations."

WHY IS THE NEED FOR LARGE WAREHOUSING A COVENTRY AND WARWICKSHIRE WIDE FIGURE RATHER THAN A FIGURE FOR RUGBY BOROUGH?

- 3.24. Large warehouses over 9,000sqm tend to be occupied by large companies that serve a regional, national or international market. They are not tied to one local authority area.
- 3.25. For this reason, it makes more sense to consider the need for large warehouses at a sub-regional level.
- 3.26. The way the requirement is calculated, using sub-regional projections of future freight traffic, means that it does not disaggregate into separate local authority projections.

HOW WILL THE STRATEGIC WAREHOUSE FIGURE BE SPLIT BETWEEN INDIVIDUAL AUTHORITIES?

- 3.27. Along with other West Midlands local authorities, Rugby Borough Council has jointly commissioned a strategic employment sites study. An earlier similar study was published in 2015 but is now out of date. A further strategic employment sites study was published by the Greater Birmingham and Solihull Local Enterprise Partnership (GBS LEP) in 2021. Rugby Borough Council was not involved in the preparation of the GBS LEP study.
- 3.28. The new West Midlands Strategic Employment Sites Study will update the position on the supply of sites. It will also find opportunity sites for potential future supply. This will include considering the contribution to meeting future need that will be made by the redevelopment of existing employment sites.
- 3.29. Once we have this evidence, we will have a clearer picture of how much more land needs to be found across Coventry and Warwickshire to meet the need for strategic warehousing. It will then be for the Coventry and Warwickshire authorities to agree how that need is split between the different local authority areas.

HOW DOES THE NEED FOR EMPLOYMENT LAND COMPARE TO THE CURRENT PLAN?

- 3.30. Under the current Rugby Borough Local Plan, we are planning for the delivery of 208 hectares of employment land 2011-2031. This includes 98ha that was to accommodate Coventry City Council's unmet need.
- 3.31. The current local plan does not distinguish between strategic and non-strategic employment land. The local plan's Rugby Borough requirement for 102ha of employment land over 20 years 2011-31, compares to an industrial land requirement in the HEDNA for 150.5ha 2021-2041. This shows that the need for Rugby Borough has grown.
- 3.32. Added to this in the current local plan is 98ha of need from Coventry City Council's area. It is yet to be decided whether Coventry City Council will be able to meet its own need for industrial land and, if not, where any unmet need will be met. However, Rugby Borough

Council will need to contribute to meeting some of the identified need for strategic warehousing land in Coventry and Warwickshire.

HOW MUCH EMPLOYMENT LAND SUPPLY DO WE HAVE?

- 3.33. The latest information is contained in the Rugby Borough Council Authority Monitoring Report 2022-2023. This records the position as at 31st March 2023.
- 3.34. The Authority Monitoring Report 2022-23 shows substantial progress to meeting the 2011-2031 requirement for employment land, with 191.53ha of the target 208ha either already built or under construction.
- 3.35. The report shows completions of 30.55ha (124,670m² in floorspace) in 2022-23 and a further 30.18ha of land (79,561m² of floorspace) under construction. The sites completed in 2021-23 and under construction contribute to meeting the 2021-2041 (or 2050) need. The sites under construction (as at 31st March 2023) are at Prospero Ansty.
- 3.36. In terms of future supply, the Authority Monitoring Report shows 115.08ha of land with planning permission which is not yet under construction. Most of this is made up by three sites: Prospero Ansty at the former Rolls Royce site (9.58ha), Tritax Symmetry which forms part of the South West Rugby strategic allocation (40.7ha), and the former Rugby Radio Station site allocation (31ha).

HOW MUCH MORE EMPLOYMENT LAND DO WE NEED TO FIND?

- 3.37. The table below shows the potential additional land needed to meet Rugby Borough's own need for industrial land. This **excludes** the Coventry and Warwickshire strategic warehousing need and Rugby Borough's need for land for offices. This varies depending on the length of the plan period we choose to plan for.

	Plan period 2021-2041	Plan period 2021-2050
Requirement for industrial land (excluding strategic warehousing and offices)	150.5ha	218.2ha
Completions 2021-2023	32.65ha	32.65ha
Total supply already identified	145.26ha	145.26ha
Supply still needing to be found	No additional supply needed	40.29ha

WHERE ARE POTENTIAL LOCATIONS FOR EMPLOYMENT LAND?

- 3.38. Land for large-scale manufacturing and distribution uses needs to have good access to A-roads and motorways. This will avoid inappropriate routing of HGVs through residential areas and country lanes.
- 3.39. Large scale employment locations should be close to existing settlements to allow staff access to work. Remote rural locations should therefore be avoided.
- 3.40. Considering these restrictions, we have identified the following potential locations. These are shown on the map on page 16.

Potential strategic employment locations
M6 junction 2 (north of junction)
Ansty Business Park expansion/A45 Walsgrave Junction
Prologis Park Ryton expansion
Safeguarded land within the South West Rugby allocation
A45/A4071 junction
A5 north of Houlton
M6 Junction 1
South of Hinckley

3.41. At this stage these are broad locations, not sites. If land is put forward in these locations or elsewhere it will be assessed through the housing and employment land availability assessment later this year. In assessing locations transport impact and HGV routing will be considered, as will the Warwickshire Local Transport Plan

3.42. Most of the broad locations shown above lie within the Green Belt. We will consider whether there are exceptional circumstances which justify alterations to the Green Belt. Other important considerations will be landscape impact, the capacity of the highways network, and transport accessibility, both for commercial traffic and for employees getting to work. We will also consider the contribution that proposals can make to reducing carbon emissions and delivering wider benefits to the borough's economy and residents.



Potential strategic employment locations

CONSULTATION QUESTIONS

1. How much employment land should we be planning for?
2. What type of employment land should we be planning for?
3. Please provide any comments you have on the suitability of any of the broad locations listed above (or another location we have missed).
4. How can we provide more space to allow existing businesses to expand?
5. We are minded to allocate sites specifically for industrial (B2) and light industrial (E(g)(iii)) uses. Do you support this and if so, where?
6. Are there exceptional circumstances that mean we should amend Green Belt boundaries to meet the need for employment land?



Regent Street, Rugby

4. TOWN CENTRE REGENERATION

WHAT IS THE ISSUE?

4.1. On 14 December 2022, the council approved the Rugby Town Centre Regeneration Strategy 2022. In addition, nationally there have been significant changes to permitted development and use classes for town centre uses. We need to update the policies of the Rugby Borough Local Plan 2011-2031 to respond to these changes and support town centre regeneration.

THE DETAIL

4.2. Chapter 7 of the Rugby Borough Local Plan 2011-2031 has the plan's three policies on Rugby town centre, policies TC1, TC2 and TC3. Since the evidence that supports the current Local Plan 2011-2021 was prepared, there have been several changes:

- The redevelopment of the first phase of the Elliott's Field Retail Park was completed in 2016 and the construction of the second phase of the retail park opened in 2018, the latter adding more than 9,000m² of retail floor space.
- The Covid 19 pandemic has accelerated the growth of online retail. Online retail has grown from 7.2% of sales at the start of the current plan period in 2011 to 26.6% in January 2023.
- In 2020 the government introduced the Class E (Commercial, business and service) use class which replaced several former town centre use classes. The effect of this change is to give greater flexibility to change the use of town centre units without the need to obtain planning permission.
- In 2021 the government introduced a new permitted development right to change the use of a building from Class E use to residential. This allows changes from Class E to residential without the need to obtain planning permission. Shops in rural areas with high house prices are particularly vulnerable to change to residential use under this policy.
- In 2022, as noted above, Rugby Borough Council approved the Rugby Town Centre Regeneration Strategy.
- The population of the borough has grown from 100,100 in 2011 to 114,400 in 2021.

4.3. To understand the impacts of these changes on Rugby town centre in more detail, we will be updating our Retail and Main Town Centre Uses Study, which was published in 2015.

WHAT MIGHT WE CHANGE?

4.4. We are considering the following local plan policy changes:

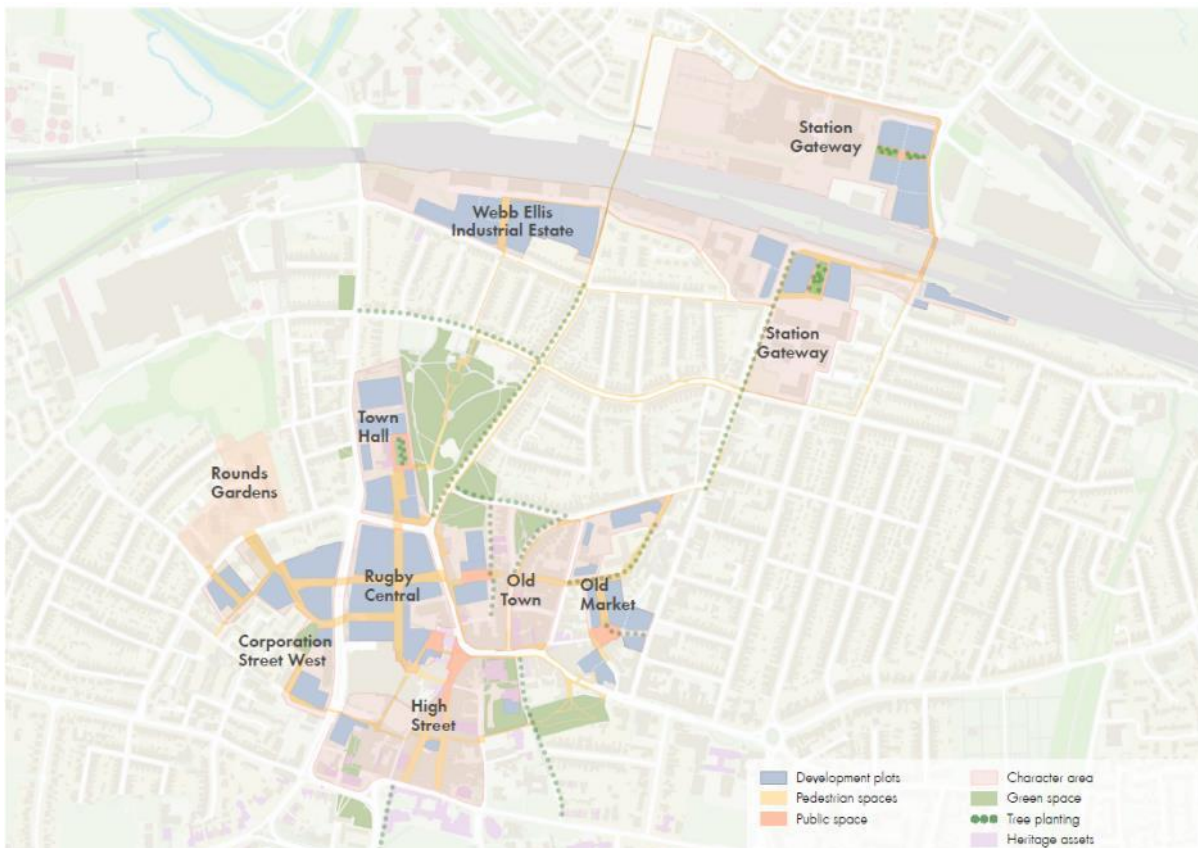
- Deleting primary and secondary shopping frontage policies, which require a specified percentage of units in the identified frontages to be in the former A1 (retail) use class.

This policy is no longer workable following the introduction of the Class E use class.

- Deleting the Primary Shopping Area (PSA) policy which looks to keep an area focussed on the former A1 (retail) use class. At present national policy still requires local plans to define PSAs, but this is likely to change.
- Introducing site allocation policies for important redevelopment sites in the Town Centre Regeneration Strategy, to set out what the council want to happen on these sites.
- Showing infrastructure improvements in the town centre that the council wants to see to support its regeneration, for example changes to public spaces and roads. The purpose of this would be to support future funding bids for these improvements and to strengthen the basis for seeking developers' contributions.
- Introducing a public realm policy setting out how we want the streets and public spaces to be designed.
- A policy that supports the principle of more housing in the town centre.
- Defining local centres. Currently the only town centre defined on the Local Plan policies map is Rugby town centre. No district or local centres are shown.

WHICH TOWN CENTRE SITES COULD HAVE SITE ALLOCATION POLICIES?

- 4.5. Site allocation policies could cover the key areas of change shown in the Rugby Town Centre Regeneration Strategy. These are shown in the map below.



Development sites identified in the Rugby Regeneration Strategy

4.6. Sites covered by site allocation policies could include:

- Rugby Town Hall, the Benn Hall and Newbold Road Car Park
- Webb Ellis Industrial Estate
- Royal Mail and Mill Road Car Park
- Stagecoach, Railway Terrace
- Rugby Central
- John Barford Car Park, Old Market Place and Railway Terrace Car Park
- Rugby Borough Council depot on Albert Street
- North Street Car Park

4.7. Site allocation policies would need to avoid being too prescriptive over land use as this could deter development. However, policies could set design and other goals for the development of a site. Site allocation policies can encourage development and support assembly of development sites.

WHERE COULD WE DEFINE LOCAL CENTRES?

- 4.8. Rugby Borough has several local centres outside of Rugby town centre. Examples include Dunchurch, Clifton Road, Hillmorton High Street, Paddock, Bilton Main Street, Brownsover, Woodlands and Coton Park. There are other centres, not listed here that could also be considered.
- 4.9. Defining local centres would help support new main town centre uses in these locations. It would also support the council in monitoring changes over time. However, it would not give the council added powers to protect units in the centres from change to residential use.
- 4.10. It might also be right to define centres within the Houlton development, including Dollman's Farm local centre and, depending upon how quickly progress is made in building, potentially the new district centre.
- 4.11. It is not proposed that Elliott's Field Retail Park or Junction 1 Retail Park should be defined as district or local centres. These retail parks do not have the characteristics of district/local centres and are instead out-of-town retail parks.

CONSULTATION QUESTIONS

7. Do you agree with our proposals to remove the primary shopping area and primary and secondary frontage designations in Rugby town centre?
8. Which town centre sites should have site allocation policies and what should they say?
9. Should we introduce a policy that sets out the improvements to streets and spaces we want to see in the town centre?
10. Should we define other local centres outside of the town centre? If yes, which centres should we include?
11. Are there other things the local plan should do to support local centre and town centre regeneration?



Kings Newnham

5. PITCHES FOR GYPSIES AND TRAVELLERS

WHAT IS THE ISSUE?

5.1. We need to find pitches for Gypsies and Travellers to meet future needs. There is a shortage of authorised sites at a national, regional and local level and as a consequence many Travellers live on unauthorised or unsuitable sites. If suitable sites can be found through the planning process it will reduce illegal encampments, which often cause conflict with the settled community.

THE DETAIL

5.2. The government’s Planning Policy for Traveller Sites (PPTS, 2015) requires local authorities in producing their local plans to set targets for pitches for Gypsies and Travellers and plots for travelling show people. We must also find sites for the next 5 years against the target and sites or broad locations for at least the next 10 years.

5.3. Until the new Local Plan is adopted the requirement for Gypsy and Traveller pitches will remain as set out in Policy DS2 of the Rugby Borough Local Plan 2011-2031.

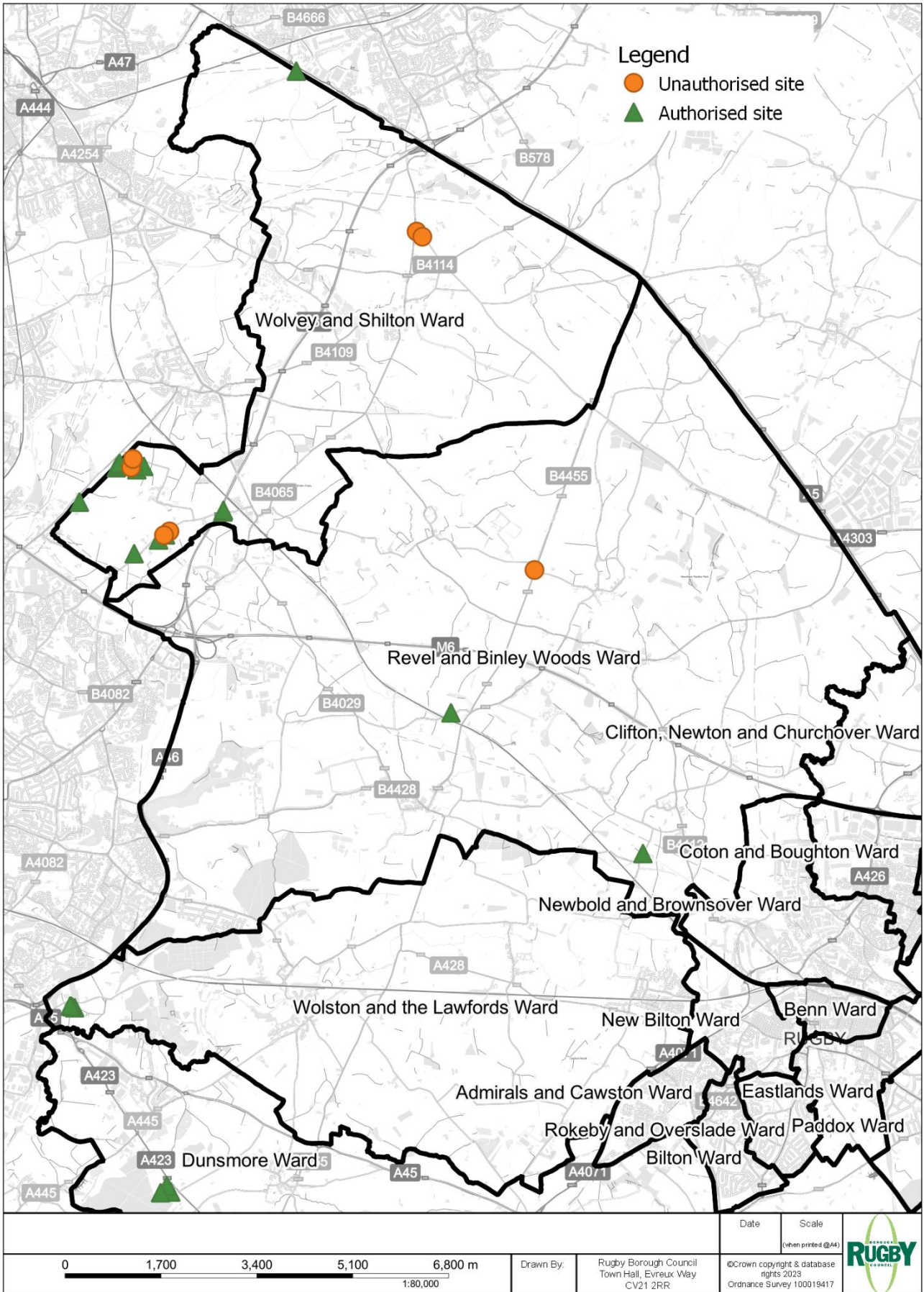
5.4. In September 2022 we published our [Gypsy and Traveller Accommodation Assessment Study](#) (GTAA). This study was produced through engagement with the Gypsy and Traveller community. It shows the need for pitches in the period 2022-2037 in five-year tranches.

5.5. The GTAA shows different targets based on two different methods for determining who is a Gypsy or Traveller. The first method used is the ‘ethnic definition’ which is based on the ethnic identity of individuals. Gypsies and Irish Travellers have both been recognised as distinct ethnic groups by the courts in the context of the Equality Act 2010.

5.6. The second method used in the GTAA is the government’s PPTS 2015 definition. The PPTS defines Gypsies and Travellers as persons of nomadic habit of life including those who have ceased to travel temporarily on grounds of their own or the family or dependent’s education or health needs or old age.

5.7. The assessed need, based on these two different definitions is shown in the table below.

Period	Ethnic definition (pitches)	PPTS 2015 definition (pitches)
2022-2027	48	29
2027-2032	15	13
2032-2037	16	14
Total 2022-2037	79	56



Existing Gypsy and Traveller Sites

- 5.8. The continued use of the PPTS definition has been thrown into doubt by the Court of Appeal's decision in *Smith v Secretary of State for Levelling Up, Housing and Communities & Anor* [2022] EWCA Civ 1391. In that case, the court concluded that the PPTS definition was discriminatory, did not pursue a legitimate aim and was not proportionate. The court's decision concerned Ms Smith's appeal against refusal of planning permission for her caravan. The court quashed the planning inspector's decision to reject that appeal. The court's decision doesn't have the wider effect of quashing the PPTS definition, but it does call into question its continued use.
- 5.9. In addition to the need for pitches, shown above, the GTAA recommends that Rugby Borough Council adopts a negotiated stopping policy for transit pitches. A negotiated stopping policy would involve caravans being sited at a suitable location for an agreed and limited period. Alternatively, the GTAA recommends a new transit site for 6-10 pitches.
- 5.10. No need for new plots for travelling show people is found in the GTAA.

WHY ARE WE NOT PRODUCING A GYPSY AND TRAVELLER DPD?

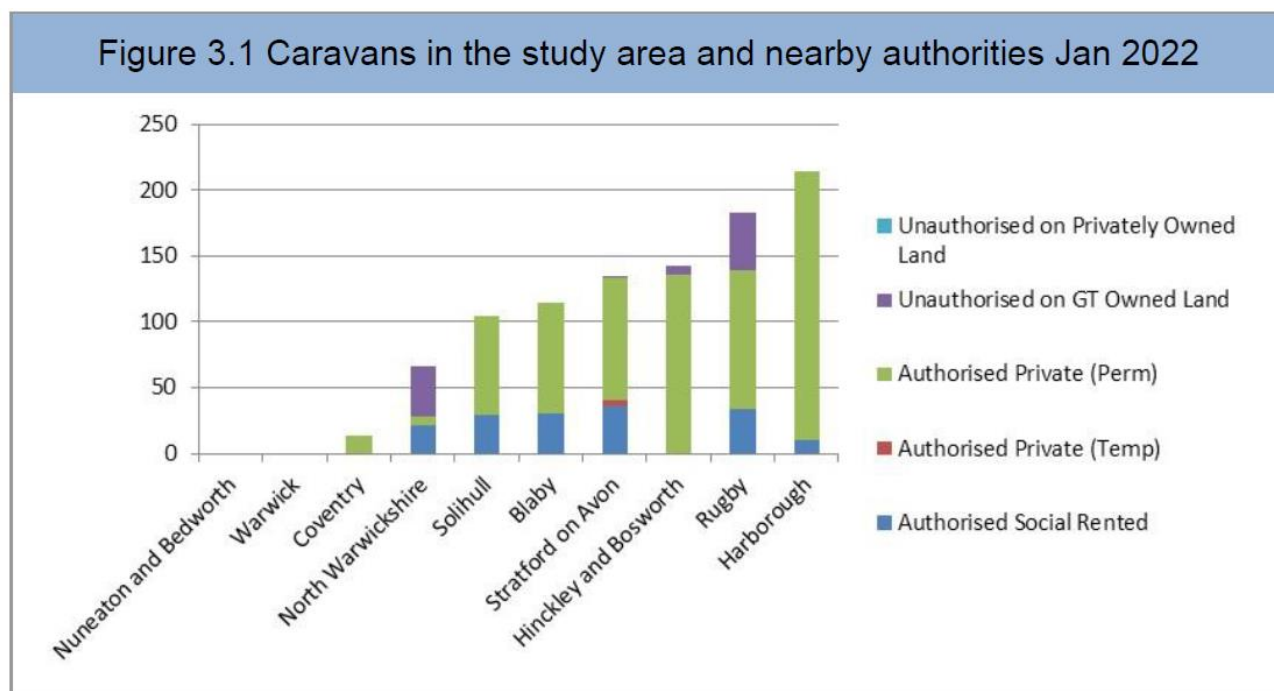
- 5.11. Between October and November 2022 we consulted on issues and options for a proposed Gypsy and Traveller DPD. At the same time, we ran a 'call for sites' asking landowners to put forward land for Gypsy and Traveller sites. No sites were put forward in response to that consultation.
- 5.12. Because no sites were put forward the council has decided that updates to policies for Gypsy and Traveller sites should now form part of the wider plan update. That gives us more options for finding sites to meet the need.

AS NO SITES WERE PUT FORWARD, WHAT ARE THE OPTIONS FOR FINDING SITES?

- 5.13. It could be that wider awareness of the local plan issues and options consultation will encourage landowners to put forward land. However, this is unlikely. Other options for bringing forward sites are:
- To regularise existing unauthorised sites, some of which are longstanding.
 - To allocate land for Gypsy and Traveller pitches as part of a wider industrial or residential site allocation. National Planning Policy for Traveller Sites encourages this approach.
 - For Rugby Borough Council to buy land for the purposes of creating a Gypsy and Traveller site and/or a transit site.
 - For another public sector landowner such as the county council to make their land available for this purpose. We are in discussions with other public sector landowners, but it looks unlikely that land will be put forward.
 - Expand existing authorised private sites. This choice was set out in the October to November 2022 consultation. This would only be a workable choice if the land is

available, and the owners of the private sites are willing to expand.

5.14. Another choice, in view of the difficulties we have in finding sites, would be to ask our neighbouring Warwickshire authorities to accommodate some of the need for Gypsy and Traveller pitches. The figure below from the GTAA 2022 shows that neighbouring Nuneaton and Bedworth Borough, Warwick District, Coventry City and Stratford-upon-Avon Districts have far fewer Gypsy and Traveller pitches than does Rugby Borough. The GTAA acknowledges that need can sometimes be met outside of the local authority in which it arises, and nature of Gypsy and Traveller lifestyles means that they are unlikely to be tied to one local authority area.



Source: DLUHC Traveller Caravan Count, Jan 2022

IF ANY SITES ARE PUT FORWARD, HOW WILL WE ASSESS THEM?

5.15. Our current Local Plan policy DS2 sets criteria for assessing the suitability of sites. We consulted on the continued use of these criteria in the Gypsy and Traveller Site Allocations DPD consultation (October – November 2022). The criteria are as follows:

- The site has good access to local services such as schools and health facilities;
- The site satisfies the sequential and exception tests for flood risk;
- The site is not next 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 with the size of the existing settlement or nearby settlements;
- The development would 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 site has appropriate vehicular access;
- The development will comply with Policy SDC1 in respect of design and impact on the surrounding area and amenity of existing residents;
- The site would be well-laid out to supply adequate space for residents;
- The site would include landscape measures to mitigate visual impacts; and
- Adequate provision for water supply, power, drainage, sewage and waste disposal can be made.

5.16. In addition to assessing sites for suitability, we will also consider availability and achievability.

CONSULTATION QUESTIONS

12. The council proposes to plan for Gypsy and Traveller pitches based on the ethnic need target of 79 pitches 2022-2037 identified in the GTAA 2022. Do you agree?
13. How can we find sites to accommodate the need for Gypsy and Traveller pitches?
 - (a) Allocate sites for Gypsy and Traveller pitches as part of new employment land or housing developments?
 - (b) Regularise existing unauthorised sites?
 - (c) Create a new borough or county council-owned site?
 - (d) Other (please explain).
14. When allocating sites for pitches, what size of site should we be seeking to allocate?
15. Should we adopt a negotiated stopping policy which allows caravans to be sited at a suitable location for an agreed and limited period.



Terraced housing near Rugby Station

6. HOUSES IN MULTIPLE OCCUPATION

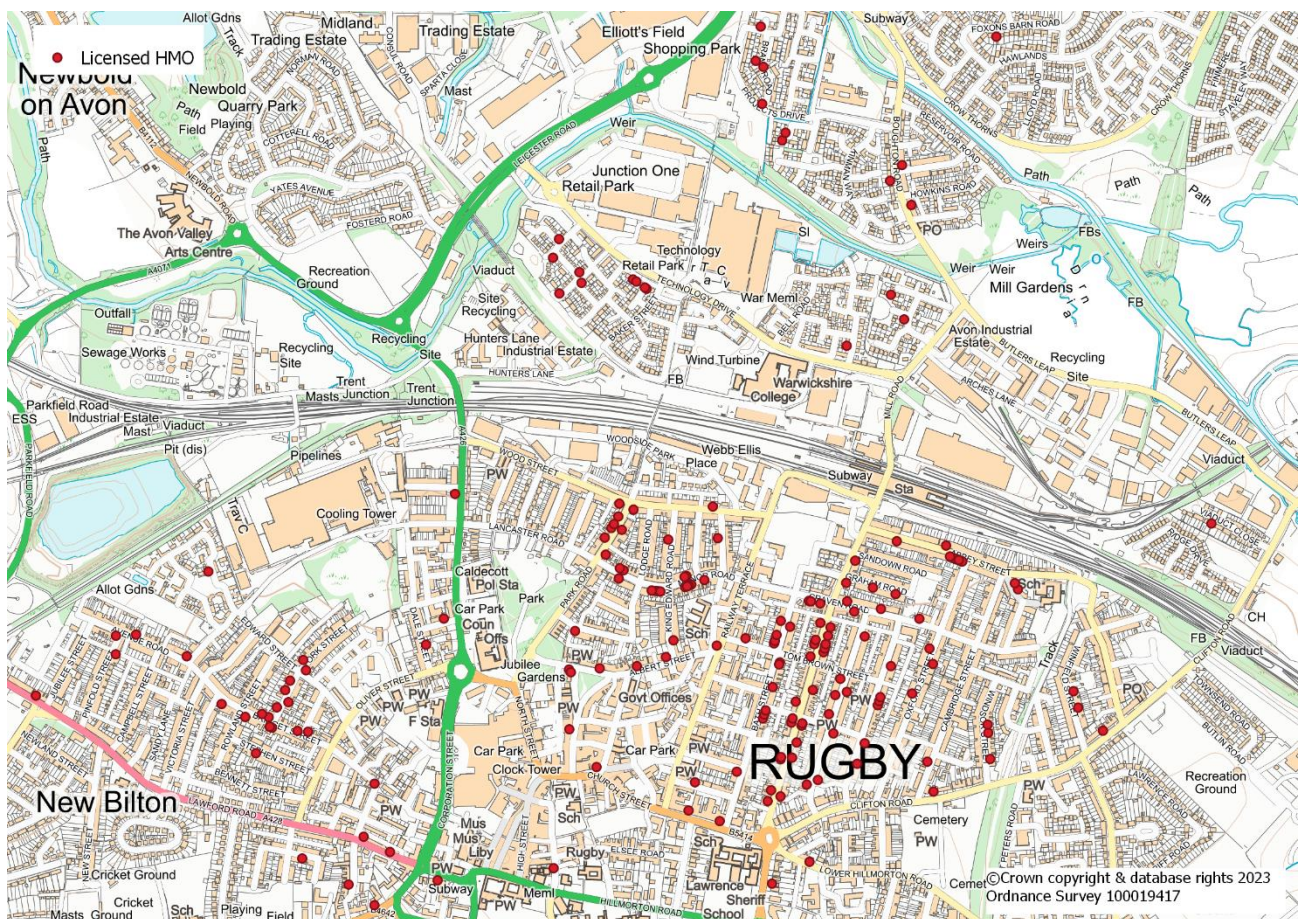
WHAT IS THE ISSUE?

6.1. Rugby town has experienced growth in the number and concentration of Houses in Multiple Occupation (HMOs), particularly within areas of central Rugby. At present, the Local Plan 2011-2031 is silent on HMOs. There is a desire to introduce a policy on HMOs through the new local plan.

HMOs IN RUGBY BOROUGH

6.2. As of February 2023, there were 199 licensed HMOs in Rugby Borough. Not all HMOs are licensed, as HMOs with fewer than five residents do not have to register. The 2021 census recorded 216 HMOs in the borough, of which 134 were small HMOs and 82 large HMOs.

6.3. The greatest concentrations of HMOs is in Benn and New Bilton wards in central Rugby.



HMOs in central Rugby

WHY HAS THERE BEEN A GROWTH IN THE NUMBER OF HMOs IN RUGBY BOROUGH?

6.4. In contrast to other parts of the country where HMOs are often student housing, it seems that most residents of HMOs in Rugby Borough are adults in work. The increase in HMOs may be

linked to the growth of major employment sites near to the town, for example Rugby Gateway and the Daventry International Rail Freight Terminal.

- 6.5. The growth in HMOs may also be associated with international migration, although this is not clear.
- 6.6. HMOs supply cheaper accommodation for workers who may not be able to afford rising rents or access smaller social housing which is in limited supply. Additionally, there has been a limited supply of smaller housing units such as apartments.

WHAT IS THE PLANNING STATUS OF HMOs?

- 6.7. Under The Town and Country Planning (Use Classes) Order 1987 small houses in multiple occupation are use Class C4. These are defined as homes occupied by three to six unrelated individuals as their main residence who share basic amenities such as a kitchen or bathroom.
- 6.8. Larger HMOs with more than six residents are classed as 'sui generis' uses.
- 6.9. Class C3 of the Use Classes Order is dwellinghouses occupied by up to six individuals living together as a single household.
- 6.10. Class L of The Town and Country Planning (General Permitted Development) Order 2015 (as amended) grants deemed planning permission for changing the use of an existing building from C3 use (dwellinghouse) to C4 use (HMO) or vice-versa. This means that houses can be changed into HMOs for up to six residents without the requirement to obtain planning permission.
- 6.11. Changing the use of a building from a C3 dwellinghouse or C4 HMO to a large HMO with more than six residents, would require planning permission.
- 6.12. Since 1st April 2018 there has been a requirement for anyone who rents out a property to five or more tenants in two or more households to apply to the local council for a HMO licence.

WHAT CONCERNS HAVE BEEN EXPRESSED ABOUT THE GROWTH IN HMOs?

- 6.13. Nationally, the following concerns have been expressed about the impact on local areas of concentrations of HMOs:
 - Relatively transient populations leading to reduced community cohesion. This can be accelerated if longer-term residents move out.
 - Pressure on parking and the paving of front gardens to increase parking.
 - Lower property standards, including untidy front gardens and reduced maintenance.
 - Overflowing bins.
 - Noise and disturbance due to the lifestyles of younger adults and shift-working. The former concern may relate more often to student housing.

- Increased local rents/house prices because of the higher overall rents that HMOs can command.

6.14. It is difficult to obtain evidence on the extent to which these issues are occurring in Rugby Borough and whether that is linked to an increase in the number of HMOs. There is, however, clear concern among councillors and some residents in affected wards about these issues.

WHAT OPTIONS ARE THERE FOR MANAGING HMOS THROUGH PLANNING?

6.15. There are several types of planning policies which seek to control HMOs:

- Amenity-based policies which look to address the impact of HMOs on the amenity of neighbouring residents/the area. Such policies may be insufficient alone in resisting proposals for HMOs. A policy could also introduce criteria that planning applications for HMOs need to satisfy, for example in relation to parking, refuse storage, and the adequacy of the accommodation for its occupants in terms of space and layout.
- Density/radius policy. For example, Coventry City Council's draft HMO DPD proposes a restriction on further HMOs where 10% or more of all dwellings within a 100m radius are HMOs.
- Proximity based policies. For example, Coventry's draft policies seek to prevent three consecutive HMOs on a street frontage or non-HMO dwellings being "sandwiched" between HMOs.

6.16. Density/radius and proximity-based policies are often used in conjunction with Article 4 directions which bring smaller, Use Class C4, HMOs within the remit of planning control. The effect of an Article 4 direction is to remove deemed planning permission for changes from C3 (dwellinghouse) use to C4 (small HMO), making planning applications necessary.

6.17. Within the town centre, using 10% of properties as the overconcentration threshold and a 100m radius, there would be existing localised over-concentrations.

6.18. A new policy could be localised and applicable in only those wards where overconcentration is an issue. However, Coventry City Council's policy notes that such an approach could displace HMOs to other areas leading to new concentrations.

WHAT MIGHT BE THE DOWNSIDES OF PLANNING CONTROL OVER HMOS?

6.19. If the effect of a concentration policy on HMOs were to reduce the supply of this type of housing, this could reduce the housing options for lower income workers. However, given the concentrations of HMOs in Rugby Borough are quite localised, it is considered unlikely that more control would reduce the supply of HMOs overall.

ARE THERE OTHER THINGS THE COUNCIL COULD DO?

6.20. The council currently licenses HMOs with five or more residents. It could introduce additional licensing to bring the threshold for requiring a license down to three residents. This could give better control over HMO standards but wouldn't prevent the creation of new small HMOs though permitted development.

CONSULTATION QUESTIONS

16. The council proposes to introduce a policy to limit concentrations of HMOs within a 100m radius to 10% of dwellings, avoid non-HMO dwellings being sandwiched between two HMOs and avoid three consecutive HMOs on a street. Do you agree with this policy?
17. We also propose to introduce a criteria-based policy that sets clearer standards for parking, refuse storage, and the adequacy of external and internal space for HMOs. Do you support such a policy?



Brandon Wood

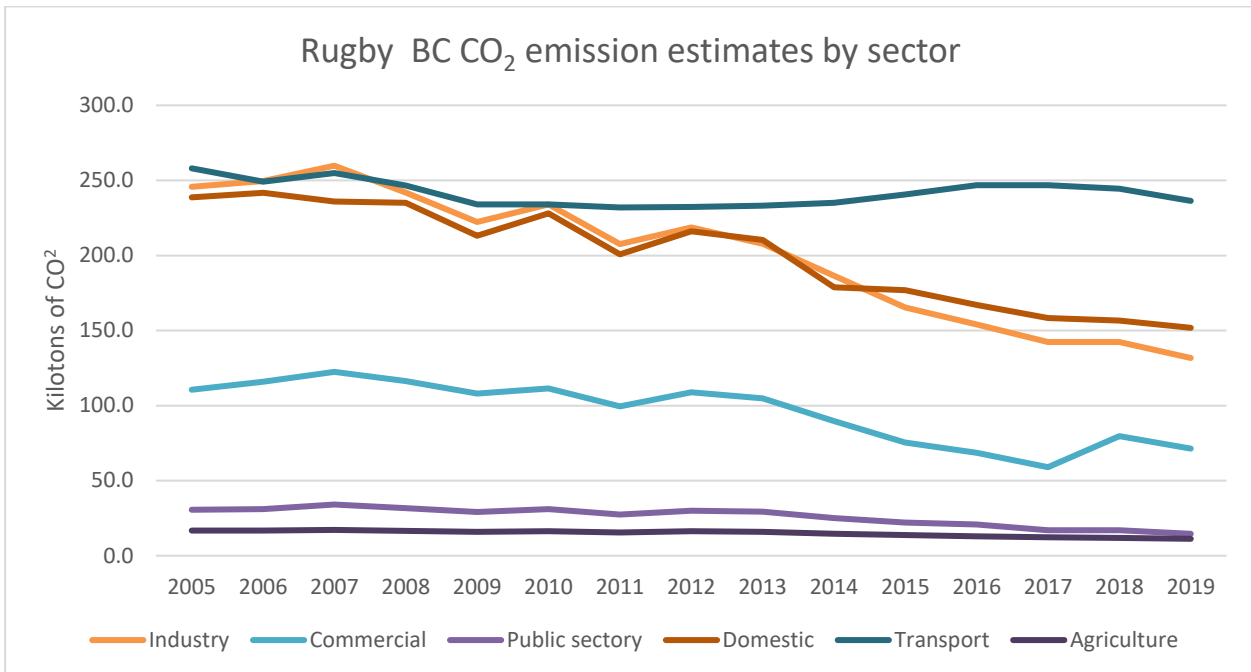
7. CLIMATE CHANGE POLICIES

WHAT IS THE ISSUE?

- 7.1. On 18 July 2019 Rugby Borough Council adopted a motion to declare a climate emergency. We need to update our local plan to contribute to reducing carbon emissions, encouraging sustainable development and alternative energy sources, and adapting to the impact of climate change on our communities.
- 7.2. We also need to set out how planning can contribute to the borough becoming net zero carbon by 2050, in line with the national government target.

THE DETAIL

- 7.3. The Intergovernmental Panel on Climate Change (IPCC) advises that “Human activities, principally through emissions of greenhouse gases, have unequivocally caused global warming, with global surface temperature reaching 1.1°C above 1850–1900 in 2011–2020.” (IPCC AR6 Synthesis Report 2023).
- 7.4. By 2040 warming is more likely than not to reach 1.5°C above 1850-1900 levels. The IPCC project that, without a strengthening of policies, global warming of 3.2°C will happen by 2100. Limiting warming to 2°C would require deep emissions reductions in all sectors this decade.
- 7.5. The IPCC states “Human-caused climate change is already affecting many weather and climate extremes in every region across the globe.” and “Continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation, and very wet and very dry weather and climate events and seasons”.
- 7.6. In 2019 Rugby Borough had the 33rd highest carbon dioxide emissions per person of 333 English local authority districts when emissions from large industrial sites, railways and motorways are excluded (these sources are excluded because they are outside of local authority influence). The sectors contributing most to Rugby Borough’s emissions are transport excluding motorways and railways (38% of emissions), industry excluding large industrial sites (32% of emissions) and domestic heating and electricity (25% of emissions). The high levels of transport and industrial emissions reflect the structure of Rugby’s economy. The trends in emissions by sector in Rugby Borough is shown in the table below:



- 7.7. Emissions have declined, except for transport emissions which have remained relatively stable.
- 7.8. We are legally required to take steps within our local plan to secure that the development and the use of land in Rugby Borough contributes to reducing carbon emissions and adapting to a changing climate (section 19(1A) of the Planning and Compulsory Purchase Act 2004).
- 7.9. Similarly, national policy says that local plans need to mitigate climate change and adapt to its effects.

HOW CAN LOCAL PLANS RESPOND TO CLIMATE CHANGE?

- 7.10. The IPCC AR6 Synthesis Report 2023 shows the choices that have the greatest potential to reduce carbon emissions in the near-term. It also shows those measures for adapting to a changing climate that are most workable.
- 7.11. The measures with the greatest potential to reduce greenhouse gas emissions in the near-term which are within the remit of local plans are increasing solar and wind energy production, ecosystem restoration and afforestation, efficient buildings and enabling modal shift by improving public transport and low-carbon travel options such as cycling.
- 7.12. The most effective climate change adaptation responses which are relevant to local plans are diversifying energy supply (through wind and solar), improving water use efficiency, sustainable land use and urban planning, green infrastructure, and ecosystem services.
- 7.13. The current Rugby Borough Local Plan has policies which are relevant to many of the above measures. The following sections look at the main options for going further than our current policies.

ZERO CARBON ENERGY SOURCES

- 7.14. The biggest reduction to our greenhouse gas emissions can be achieved by installing more solar

and wind electricity generation. This is also important to reduce our reliance on imported gas, reduce the price of electricity and achieve greater energy security. The energy price rises following Russia's invasion of Ukraine have highlighted the importance of energy security.

- 7.15. The government's data shows Rugby Borough had 16.7 megawatts (MW) of renewable electricity production capacity in 2021. The main parts of this were 8.7 MW of solar energy and 6.1 MW of landfill gas. Rugby has the 269th most renewable energy generating capacity installed out of 376 Great British and Northern Irish local authorities.
- 7.16. The main renewable energy technologies likely to be workable in the borough are solar and wind energy.
- 7.17. National policy states that "a planning application for wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan or a supplementary planning document; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been appropriately addressed and the proposal has community support".
- 7.18. The current Rugby Borough Local Plan does not show any areas as suitable for wind energy development. This means that at present new wind farms in the borough are blocked.
- 7.19. Other countries are more supportive of onshore wind energy. For example, Scotland, Germany, Spain, France.
- 7.20. National policy is silent on solar farms. Solar farms and wind energy would be classed as inappropriate development in those parts of the borough which are Green Belt. This means that planning permission for solar farms in these areas would only be granted if very special circumstances can be shown to exist.
- 7.21. We could take a more supportive stance to both solar and wind energy, including identifying areas in which we would support new wind and solar energy generation. These could include locations along the A5 and motorways including highway verges and central reservations. Additionally, we could support or even require roof-mounted solar panels on certain types of building, for example large industrial and warehouse buildings. This could form part of a net zero buildings policy (see below).
- 7.22. In addition to wind and solar, other zero carbon energy sources and technologies are likely to be important. These could include hydrogen energy infrastructure and battery energy storage systems/

AFFORESTATION, ECOSYSTEM RESTORATION AND GREEN INFRASTRUCTURE

- 7.23. The introduction from November 2023 of mandatory 10% Biodiversity Net Gain (BNG) from development through the Environment Act 2021 strengthens the ability of local areas to secure habitat restoration as part of development. The purpose of biodiversity net gain is not to respond to climate change, but to enhance biodiversity. This is important because England is one of the most nature depleted countries in the world. However, the delivery of biodiversity

net gain will also have benefits for both reducing greenhouse gas emissions and adapting to climate change.

- 7.24. The requirement in the Environment Act 2021 is that development sites should deliver at least a 10% enhancement on the pre-development biodiversity value of the site. The priority is to deliver this improvement on site, but there is also a choice for the requirement to be met by improving the biodiversity of land elsewhere. More information on BNG can be found here: <https://www.gov.uk/government/collections/biodiversity-net-gain>
- 7.25. Because BNG is in legislation, we do not need to have a local plan policy to secure it. However, there are options for us in the new local plan to:
- Require more than the 10% biodiversity net gain required by the Environment Act. This would have implications for the viability of development.
 - Specify priority locations or allocate sites for offsite biodiversity net gain. This option could support larger scale habitat restoration/creation, but it could reduce the flexibility of the market and Warwickshire County Council to decide where offsite gains should take place.
- 7.26. A linked but separate topic is green infrastructure and public open space. This is currently covered by Local Plan 2011-2031 Policy HS4 (Open Space, Sports Facilities and Recreation).
- 7.27. We will revisit those standards in the new local plan. In reviewing our open space and green infrastructure policies, one option would be for us to set a policy requiring new developments to increase tree canopy cover. Colchester Borough Council, for example, requires major developments to deliver a 10% increase in on site tree canopy cover. Cornwall Council goes further, in its recently adopted Climate Emergency DPD, by requiring canopy coverage equal to at least 15% of the site area to be provided in all major development.
- 7.28. In 2023 Friends of the Earth estimated, based on National Forest Inventory data, that just 4.5% of Rugby Borough is woodland. This places Rugby Borough in the bottom 20% of English local authorities for woodland cover. This strengthens the case for a canopy cover policy.

ENERGY AND WATER EFFICIENT BUILDINGS

- 7.29. In June 2022, the government's updated Building Regulations 2021 came into effect with uplifted standards for building energy performance (Part L of the Building Regulations). These changes reduced Carbon Dioxide emissions targets by 31% for new homes and 27% for other buildings compared to the earlier 2013 standards.
- 7.30. In 2025 the government will implement the full Future Homes Standard (FHS) and Future Buildings Standard (FBS). The FHS will require Carbon Dioxide emissions to be 75-80% lower than 2013 version of the Building Regulations. The FHS and FBS will ensure that buildings built after 2025 are 'zero carbon ready' which means that no retrofit would be needed for the homes to become zero carbon in the longer term as the electricity grid decarbonises.
- 7.31. These changes are being implemented through the Building Regulations which are set nationally. The government has made it clear that local authorities can introduce more

stringent standards through their local plans.

- 7.32. Local policies can require buildings to be 'net zero' now. This is achieved by setting more stringent building energy performance standards (see boxed text below) requiring on-site renewable energy production to match energy consumption and, if that is not possible, requiring developers to make a financial contribution to a carbon offset fund set up by the council.

How do local plan policies require higher levels of building energy performance?

There are two main ways in which more stringent policies can be drafted.

The first way is to set standards as a specified percentage improvement on the energy performance metrics required by Part L of the Building Regulations. The Building Regulations use three metrics. (1) Emissions Rate (2) Primary Energy Rate and (for dwellings) (3) Fabric Energy Efficiency Rate. In each case the Building Regulations set target values.

The Emissions Rate is measured in kilograms of CO₂ emissions per square metre of floor area per year. It estimates emissions from space heating, water heating, pumps and fans (cooling) and lighting. It varies depending on which fuel is used. Where renewables are produced on site, these are subtracted from the energy demand.

The Primary Energy Rate models how much energy (in kilowatt hours per square metre per year) will be needed for heating, hot water, lighting and cooling for the building. It depends on the fuels used. Where renewables are produced on site, these are subtracted from the energy demand.

The Fabric Energy Efficiency Rate measures the demand for energy (in kilowatt hours per square metre, per year) for heating and cooling. It depends on factors like the building's size, shape, insulation, air permeability, need for mechanical ventilation

The second way is to set more stringent local targets for building energy use, which are not linked to the Building Regulations. These can be targets for total energy use and/or energy use for space heating, in each case expressed in kilowatt hours per square metre per year. Total energy use targets will include energy use for space heating, water heating, cooling/ventilation, and lighting (this is called regulated energy). Unlike the Building Regulations, targets may also include unregulated energy use, which will include energy used running appliances like IT equipment, cookers, refrigerators etc.

- 7.33. An example of a recently adopted local plan that sets more stringent targets is the Bath and North East Somerset (BANES) Core Strategy and Placemaking Plan adopted 19 January 2023. BANES' policy is a net zero policy in that it requires on-site renewables to meet on-site energy demand or, failing that, a payment into an offset fund.

- 7.34. Another example is Cornwall Council's Climate Emergency DPD adopted 21 February 2023 which effectively adopts the same policy text as BANES in requiring new residential development to be net zero.

- 7.35. Locally, Warwick District Council's Net Zero Carbon DPD is currently at the examination stage.

- 7.36. To implement a Net Zero buildings policy in Rugby Borough we would need applicants for planning permission to submit energy statements and we would need to recruit a specialist officer to assess those energy statements.
- 7.37. A policy requiring net zero buildings would increase build costs. Cornwall Council's 2021 viability evidence estimated that the cost of their net zero policy would be to add £8,189 to build costs compared to a house built under the 2013 Building Regulations (before the 2021 changes were implemented). This compares to the costs of the Future Homes Standard 2025 which was estimated to be £3,538 per house above the 2013 Building Regulations.
- 7.38. Bath and North East Somerset's evidence estimates that net zero for non-residential development would increase build costs by 4%. For residential developments, Bath's evidence shows a 3% increase to build costs. Warwick DC's viability evidence uses the same 3% uplift to build costs for residential development, but a 6% uplift to build costs for non-residential development.
- 7.39. Rugby Borough is in a water stressed area. We already though our local plan require that new dwellings meet the additional Building Regulations requirement to limit water use to 110 litres of water per person per day. Through the new plan we could extend water efficiency requirements to non-residential buildings. One way of doing that, proposed in the Greater Cambridge local plan, is to require non-residential buildings to achieve full credits for Wat 01 of the BREEAM standard.

CONSULTATION QUESTIONS

18. Should we show areas of the borough in which wind and/or solar energy will be supported? If so, where?
19. If some new wind development schemes could be community owned by Rugby Borough residents, would that increase your support for this type of development?
20. We are minded to introduce a policy that supports other zero carbon energy infrastructure including battery energy storage and hydrogen energy infrastructure. Do you agree?
21. Should we adopt a minimum tree canopy policy for new development?
22. Should we identify priority locations or allocate sites for biodiversity net gain for sites which are unable to provide all the net gain on site and, if so, where?
23. Would you support the creation of additional country parks as part of delivering biodiversity net gain?
24. Should we require developers to prioritise the delivery of biodiversity gain within close proximity to the development?

25. We are considering requiring all new residential developments to be net zero. Do you agree?
26. We are considering requiring all new non-residential developments to be net zero. Do you agree?
27. Are there other climate change policies we should be introducing?
28. Should we require non-residential development to meet higher water efficiency standards to reduce water usage?



Charolais Gardens, Rugby

8. DESIGN CODING AND GUIDANCE

THE ISSUE

- 8.1. Since the current Local Plan 2011-2031 was adopted, the government has placed greater emphasis in national policy on the design quality of new development. We need to respond to that locally through updated policies.

THE DETAIL

- 8.2. The National Planning Policy Framework (NPPF) says that one of the goals of the planning system is to create well-designed, beautiful places and that good design is a key aspect of sustainable development. The NPPF also says that:

To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences.

- 8.3. Design guides and codes can be area-wide, for a neighbourhood or for a specific development site. To carry weight in decision-making they should be produced as part of a plan or as a supplementary planning document.
- 8.4. A design code is a set of illustrated design requirements that set specific, detailed parameters for the physical development of a site or area. A design guide is less strict, providing guidance on how development can be carried out in accordance with good design practice. Design codes can also be introduced through Neighbourhood Plans.
- 8.5. The government has published [the National Design Guide](#) and [National Model Design Code](#).
- 8.6. The Levelling-up and Regeneration Bill, at the time of writing in the House of Lords committee stage, will go further by requiring every local authority to produce a design code for its area.
- 8.7. In addition, the [Building Better, Building Beautiful Commission](#) identified a number of ways in which higher quality design and style of homes could build on local knowledge and tradition to develop new housing with the consent of the local community.

WHAT CURRENT DESIGN POLICY DO WE HAVE?

- 8.8. The borough has, in addition to current local plan policy, our Climate Change and Sustainable Design and Construction Supplementary Planning Document which includes as Appendix B the Residential Design Guide.
- 8.9. The Coton Park East Supplementary Planning Document and South West Rugby Supplementary Planning Document provide brief, site-specific design guidance for those sites.
- 8.10. The neighbourhood plans for Willoughby, Ryton-on-Dunsmore, Brinklow, Brandon and

Bretford, Wolvey and Coton Forward also have design policies for those areas. Some parishes have village design statements in place, although many of these were produced a long time ago.

WHAT ARE THE OPTIONS FOR NEW DESIGN CODES AND GUIDANCE?

- 8.11. In view of the increased emphasis government has placed on good design, there is a need to strengthen and extend our local design policy.
- 8.12. There are two key issues to decide about new design policy. First, we need to decide the scale at which we produce design codes/guidance. Second, we need to decide the degree of detail and prescription to include.
- 8.13. As outlined above, the scale covered could be all of Rugby Borough, smaller neighbourhoods such as Rugby town centre, or individual development sites such as South West Rugby.
- 8.14. The Department for Levelling Up, Housing and Communities' publication *National Model Design Code Pilot Programme Phase 1: lessons learned* suggests that individual neighbourhoods or sites are the scale at which design coding works best.
- 8.15. One way of splitting the borough into smaller areas, suggested in the National Model Design Code, would be to define area-types based on character. Examples of these could include...
- 8.16. Turning to the question of degree of prescription, most historic design policies have been flexible guidance rather than strict rules. However, there is a general recognition that the results of this have been variable and there is a push from government for clearer design codes.
- 8.17. The report on the design coding pilots finds that some matters lend themselves to strict rules, for example building heights, density, parking ratios, front garden sizes, boundary treatments, amounts of land for open space, street patterns, individual plot sizes. Other matters like the appearance of buildings are more suited to guidance. Most design codes produced in the pilot had a mix of must (mandatory), should (expected) and could (optional) statements.

HOW CAN WE RESOURCE DESIGN CODING?

- 8.18. Rugby Borough Council doesn't employ an urban designer and doesn't have the skills to produce design codes in house. This means that we would need to instruct consultants to help us produce design codes. This would increase the expense of doing so.
- 8.19. One choice for managing the cost would be for design codes to be produced as part of neighbourhood plans. The disadvantages of this approach are that it would delay design codes being put in place and lead to uneven coverage.

CONSULTATION QUESTIONS

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

30. Which areas should design codes cover?

- (a) Borough-wide
- (b) Borough-wide divided into character areas (for examples Rugby town centre, interwar suburb, Victorian terrace, village core)
- (c) only for some neighbourhoods (please specify which),
- (d) only for large new development sites
- (e) other (please specify)



Houlton

9. LAND FOR HOUSEBUILDING

WHAT IS THE ISSUE?

9.1. Our current local plan runs until 2031. We need to plan for new housing over the longer term.

THE DETAIL

9.2. The government's Planning Practice Guidance sets out a standard method for local authorities to calculate their minimum future housing need. The National Planning Policy Framework (NPPF) requires the standard method to be used unless exceptional circumstances justify an alternative approach.

9.3. At the time of writing, the standard method is based on the 2014-based household projections which forecast future increase in the number of households from 2014. The average annual increase in the number households over the next 10 years is the starting point for the standard method (using the 2014-based projections). This is then adjusted using housing affordability data to give the minimum annual local housing need.

9.4. The affordability adjustment uses the ratio of average annual earnings to average house prices (in both cases medians) in the local authority. The uplift is applied if the average house price is more than four times average annual earnings. The higher house prices are compared to earnings, the higher the uplift. For each 1% the ratio is above 4, the housing need is increased by a quarter of a percent.

9.5. Average house prices in Rugby Borough in 2023 were 7.17 times average incomes. This leads to a 20% uplift to housing need.

9.6. As summer 2023, the housing requirement for Rugby Borough calculated using the standard method is **506 homes per year**.

9.7. The government has set out its intention to amend the standard method for calculating local housing need in 2024, when the first post-Census 2021 population and household projections are published.

9.8. The Coventry and Warwickshire Housing and Economic Development Needs Assessment (Iceni Projects, 2022 'HEDNA') was commissioned by the six Coventry and Warwickshire local authorities. The HEDNA provides an alternative housing need figure. It uses the most up to date data available to produce a projection for future population growth and growth in the number of households. The affordability uplift use in the government's standard method is then applied to give a housing need figure.

9.9. The HEDNA's 2021-2041 annual housing need figure for Rugby Borough was 735 homes per year using 2021 affordability data. This number could be recalculated using the latest 2022 affordability data and a 2023 base date, which would reduce the figure to 672 homes per year.

9.10. A different population and household projection was produced for the HEDNA because of concerns about the inaccuracy of the 2014 based population and household projections, which

are used in the government’s standard method. The 2014 household projections significantly overestimate Coventry’s population in 2021, compared to what the 2021 Census shows. The overestimation of Coventry’s population is a longstanding issue, which the Office for National Statistics has acknowledged.

9.11. The overestimation of Coventry’s population leads to an overestimation of the population and need for housing in the Coventry and Warwickshire Housing Market Area within the government’s standard method. The table below shows a comparison of the need for housing across the housing market area under the standard method and the HEDNA projection.

	Coventry	North Warks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	Total
Standard method 2023	3,247	168	442	506	569	670	5,602
HEDNA 2022	1,964	119	409	735	868	811	4,906

HOW HAS RUGBY BOROUGH’S POPULATION CHANGED SINCE 2011?

9.12. Between 2011 and 2021 Rugby Borough’s population grew by 14.3%, higher than the increase for England of 6.6%. Rugby Borough’s percentage population growth was the highest among local authority districts in the West Midlands over this period, although the same as neighbouring Harborough District in Leicestershire. Rugby Borough’s population grew by a similar 14.4% between 2001 and 2011.

9.13. Compared to England as a whole, Rugby Borough has seen higher levels of 2011-2021 population growth among those aged 75 to 79 (up 47% compared to an increase of 22% nationally), those aged 55 to 59 (up 37% compared to an increase of 27% nationally) and those aged 30 to 34 (up 33% compared to an increase of 13% nationally).

9.14. In 2021 Rugby’s average household size was 2.4 people. This is the largest in Warwickshire after Coventry, and an increase from 2.34 people in 2011.

9.15. Over the period 2011-2021 the number of dwellings in Rugby Borough increased by 14%, compared to 8.3% for England as a whole (source ONS Live Table 125).

9.16. We do not yet have detailed Census 2021 components of population growth data. However, Office for National Statistics time-series data published with the mid-year estimates suggests that between mid-2010 and mid-2020 in Rugby Borough 59% of population growth was due to people moving to the area from within the UK, 22% was due to international migration, and 19% was due to natural change (i.e. more births than deaths).

HOW DOES FUTURE NEED FOR HOMES COMPARE TO THE CURRENT RUGBY BOROUGH LOCAL PLAN AND PAST LEVELS OF HOUSEBUILDING?

- 9.17. The current Rugby Borough Local Plan 2011-2031 plans for 12,400 additional homes over the twenty-year plan period. Of these, 2,800 are homes that Coventry City Council was unable to accommodate in its administrative area.
- 9.18. The current plan seeks to accommodate 620 new homes a year as an average across the plan period. This is higher than housing need of 506 new homes a year calculated using the government's standard method, but lower than HEDNA 2022 need of 735 new homes a year.
- 9.19. Over the period 2011 to 2023 on average 673 new homes (net) a year were built in Rugby Borough. Over the longer term, 2001-2023 an average of 616 net new homes each year have been built in Rugby Borough.

HOW MUCH HOUSING DO WE HAVE IN THE PIPELINE?

- 9.20. We have a lot of land for housing that already has planning permission or was allocated for development in the current Local Plan 2011-2031. If, as is likely, the base date for the new plan is 2021, then houses that were built in 2021-2023 will also count towards meeting the housing requirement for the new plan. Finally, we know small sites of fewer than five homes consistently deliver around 50 new homes a year in the borough. We call these small sites windfalls.
- 9.21. These sources of projected future housing supply are shown in the table below. This table shows the future housing supply as at 31st March 2023.

Source of future housing supply	Number of houses
Housing Completions 2021-2023	2,288
Coton Park East site allocation	720
South West Rugby site allocation (estimated 4,364 deliverable by 2041)	4,766
Rugby Gateway site allocation	703
Houlton (Rugby Radio Station) site allocation (estimated 3,165 deliverable by 2041)	4,603
Main rural settlement site allocations	410
Other current planning permissions (less 5% non-implementation rate for permissions not under construction)	506
Small site (fewer than five homes) windfalls 2023 to 2041 at 50 homes per year (1,350 to 2050)	900
Total identified supply to 2041	13,056
Total identified supply to 2050	15,346

HOW MUCH MORE HOUSING LAND DO WE NEED TO IDENTIFY?

- 9.22. The answer to this question depends on how many homes we plan for and the length of the plan period. We know that to be found 'sound' by government planning inspectors, we will need to include an additional supply 'buffer' above the housing requirement. We have included a 10% buffer in the calculations below.

9.23. The first table below shows the position if the plan period is 2021-2041. The second table below shows the position if the plan period is 2021-2050

Scenario	Minimum local housing need	HEDNA 2022
Houses each year	506	735
Total Houses 2021 to 2041	10,120	14,700
Total houses 2021 to 2041 with 10% supply buffer	11,132	16,170
Total supply already identified	13,056	13,056
Supply still needing to be found	No additional supply needed	3,114

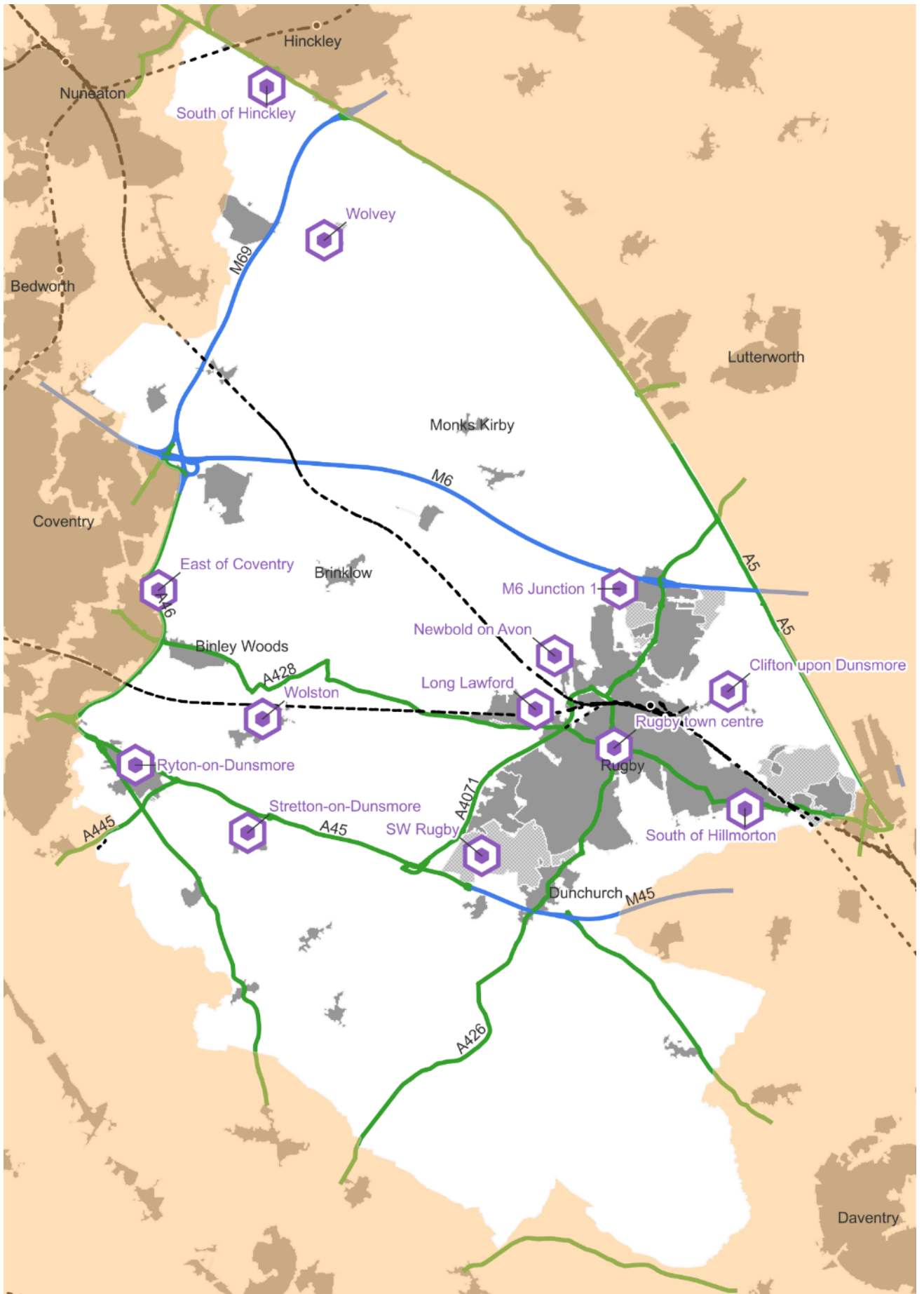
Scenario	Minimum local housing need	HEDNA 2022
Houses each year	506	735
Total Houses 2021 to 2050 (29 years)	14,674	21,315
Total houses 2021 to 2050 with 10% supply buffer	16,141	23,447
Total supply already identified	15,346	15,346
Supply still needing to be found	795	8,101

WHERE ARE THE POTENTIAL LOCATIONS FOR NEW HOUSING?

9.24. We have not yet produced a Housing and Economic Land Availability Assessment, so we do not know which land will be put forward as potentially suitable for housing development.

9.25. The below map shows, based on sites that were put forward to the last plan and a high-level consideration of constraints and designations, some of the broad locations in which housing could be built. Those locations include Rugby town centre (see section 8) where there is potential to encourage more new homes.

9.26. There may be other locations that we have not shown on this map that will be put forward in response to this consultation.



Potential housing locations

WHAT TYPE AND SIZE OF NEW HOMES DO WE NEED?

- 9.27. The HEDNA 2022 provides an estimate of the need for affordable housing. This forms part of overall housing need, rather than being additional to it. Nonetheless, the evidence shows considerable need for affordable housing, particularly in the social or affordable rented tenures (together making up 82% of affordable housing need). It will be important for the new plan to maximise the number of new affordable homes that are built.
- 9.28. We will decide the percentage of affordable housing that we can realistically seek on housing development sites when we have viability evidence.
- 9.29. The HEDNA also includes evidence on the mix of new housing sizes that are likely to be needed in future, both for affordable and open market housing. The HEDNA consultants recommended the mix of sizes of new homes for different tenures should be as shown in the table below.

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market housing	10%	30%	45%	15%
Affordable home ownership	20%	40%	30%	10%
Rented affordable housing	35%	30%	20%	15%

HEDNA 2022 suggested housing size mix

- 9.30. The housing size mix shown above is based on there being future reductions in under-occupancy (where households have more bedrooms than they need) and over-occupancy (where there is overcrowding) among newly forming households in comparison to how households of the same age lived in 2011. There are question marks about whether this would happen, because it would rely on more downsizing among older residents.
- 9.31. It is also important to note that housing mix policies set out the mix of housing we need across the borough. It will not be realistic to seek exactly this mix from every new development.
- 9.32. The HEDNA also recommends that we require all new dwellings in all tenures to meet optional Building Regulations M4(2) standards for accessible and adaptable dwellings, which are similar to the Lifetime Homes Standards. It also recommends that at least 10% of homes meet the higher M4(3) wheelchair user dwelling standards (with a higher proportion needing to meet this standard in the affordable sector).

CONSULTATION QUESTIONS

31. How many homes should we be planning for?
- (a) Minimum local housing need
 - (b) The HEDNA 2022 need
 - (c) Other (please specify)
32. Would you support RBC both improving existing and developing new social and affordable housing (like the regeneration of Rounds Gardens and Biart Place)?

33. Please provide any comments you have on the suitability of any of the broad locations listed above for new housing. Are there any locations that we have missed?
34. Do you support a requirement for all new dwellings to meet the additional Building Regulations standard for accessible and adaptable dwellings and for at least ten percent of dwellings to be suitable for wheelchair users?
35. Please provide any other comments you have on the type and size of new homes we need.



Dunchurch village

10. OTHER TOPICS

- 10.1. This document has focussed on seven big planning issues facing our borough. Please use the consultation question below to highlight any other planning issues or new policies you think we should include in the new plan.
- 10.2. For example, we intend to increase the emphasis on sustainable travel to accord with Warwickshire County Council's new Local Transport Plan 4 and the forthcoming transport plan for Rugby Borough to be produced by Warwickshire County Council.
- 10.3. We are also considering introducing a policy to protect stadia as community and sports facilities.

CONSULTATION QUESTION

36. Are there any other issues or policies (not covered by the questions above) that we should cover in the new plan?
37. Do you support our intention to bolster our policies on sustainable travel?
38. Do you support a policy protecting stadia as community and sports facilities? If so, which stadia should we protect?