

AGENDA MANAGEMENT SHEET

Report Title: Local Plan Issues and Options Consultation

Name of Committee: Cabinet

Date of Meeting: 23 October 2023

Report Director: Chief Officer – Growth and Investment

Portfolio: Growth and Investment

Ward Relevance: All wards

Prior Consultation: No

Contact Officer: Neil Holly, Development Strategy Manager
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Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C)
 Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E)
 Residents live healthy, independent lives, with the most vulnerable protected. (HC)
 Rugby Borough Council is a responsible, effective and efficient organisation. (O)
[Corporate Strategy 2021-2024](#)
 This report does not specifically relate to any Council priorities.

(C) Climate
(E) Economy
(HC) Health and Communities
(O) Organisation

Summary: The report seeks Cabinet’s recommendation to Council that they

i) Approve the Rugby Borough Local Plan Issues and Options document, attached as Appendix 2a (with a short form, questionnaire version at Appendix 2b), for an eight-week public consultation; and

- ii) adopt the amended Local Development Scheme (LDS), attached as Appendix 1;
- iii) agree to discontinue the preparation of the Gypsy and Traveller Site Allocations DPD and instead combine this into the new Local Plan; and
- iv) delegate authority to the Chief Officer for Growth and Investment to make minor amendments as necessary to the Local Development Scheme and/or the Issues and Options document.

Financial Implications: The costs of the consultation exercise can be met from within existing budgets.

Risk Management/Health and Safety Implications: A project risk register for the new Local Plan is attached at Appendix 7.

Environmental Implications: Adopting a new local plan will have significant environmental implications for the borough. It represents an opportunity to update our policies on a wide variety of issues with environmental implications, such as climate change policy and the identification of development site allocations.

Legal Implications: Under s15 of the Planning and Compulsory Purchase Act 2004 the council is required to prepare and maintain a local development scheme specifying the local development documents it intends to prepare and the timetable for their preparation. Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the requirements for this consultation stage.

Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 states that a local planning authority must complete a review of its local plan at least every five years, starting from the date of adoption of the local plan. The current Rugby Borough Local Plan was adopted on 4 June 2019. Therefore, a review needed to be completed by 4 June 2024. The purposes of a review is to determine whether or not the plan needs updating and, if so, the scope of update needed.

A Regulation 10A review was undertaken as part of the report to cabinet on 5th December 2022:

<https://www.rugby.gov.uk/meetings/meeting/1272/cabinet>

and concluded that there was a need for a full update to the local plan.

Equality and Diversity:

An Equality Impact Assessment has been undertaken and is provided as Appendix 6 to this report. Romany Gypsies and Irish Travellers are ethnic groups under the Equality Act 2010. Discontinuing the Gypsy and Traveller Site Allocations DPD could have an adverse impact on Gypsies and Travellers if it were to delay the meeting of their accommodation needs. However, it is not considered that incorporating Gypsy and Traveller site allocations into the new Local Plan will delay meeting those needs compared to continuing with a separate Gypsy and Traveller Site Allocations DPD. Additionally, incorporation into the new plan allows a wider range of options to be explored for meeting those needs.

The Issues and Option document does not change policy, but it enables the preparation of the new Local Plan to move forward. It is not considered to have equalities impacts at this stage.

Options:

Option 1 – Cabinet recommends to Council that it approves the Issues and Options document for an eight-week public consultation. This is the recommended option.

Option 2 – Cabinet recommends to Council that it does not proceed with the Issues and Options consultation at present and instead pauses preparation of an updated Local Plan. The Council would then await changes to national planning legislation and policy with a view to proceeding with a full plan update when the Levelling Up and Regeneration Bill's plan-making provisions are brought into effect (currently proposed to be summer 2025 at the earliest). This option would require an amended Local Development Scheme to be brought back to Cabinet and Council at the next available opportunity.

Option 3 – Cabinet recommends to Council that it pauses plan-making on a full plan update to wait for implementation of the planning reforms under the Levelling Up and Regeneration Bill (as per Option 2). In the meantime, Cabinet recommends to Council that it proceeds with a partial update to the Rugby Borough Local Plan 2011-2031 to cover Houses in Multiple Occupation, climate change and (to the extent permissible under a partial plan update) town centre regeneration policies only.

As the current Rugby Borough Local Plan 2011-2031 will be five years post adoption in June 2024 and the plan period ends in March 2031, it is not considered that delaying a full plan update indefinitely is a reasonable option. An indefinite delay would lead to the plan's policies becoming out of date.

No alternative options are identified in relation to discontinuance of the separate Gypsy and Traveller Site Allocations DPD. Based on the nil response to the call for sites there is no realistic prospect that this standalone DPD can successfully proceed. For the same reason, advancing Gypsy and Traveller site allocations as part of the partial plan update (Option 3 above) is not identified as a realistic option.

Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT –

- (1) The Issues and Options consultation document, attached as Appendix 2a (with a short form, questionnaire version at Appendix 2b), be approved for an eight-week public consultation;
- (2) the amended Local Development Scheme (LDS), attached as Appendix 1, be adopted;
- (3) the preparation of the Gypsy and Traveller Site Allocations DPD be discontinued and be instead combined into the new Local Plan; and
- (4) delegated authority be given to the Chief Officer for Growth and Investment to make minor amendments as necessary to the Local Development Scheme and/or the Issues and Options document.

Reasons for Recommendation:

To allow the preparation of the new Local Plan to progress.

Cabinet – 23 October 2023

Local Plan Issues and Options Consultation

Public Report of the Chief Officer – Growth and Infrastructure

Recommendations:

IT BE RECOMMENDED TO COUNCIL THAT –

- (1) the Issues and Options consultation document, attached as Appendix 2a (with a short form, questionnaire version at Appendix 2b), be approved for an eight-week public consultation;
- (2) the amended Local Development Scheme (LDS), attached as Appendix 1, be adopted;
- (3) the preparation of the Gypsy and Traveller Site Allocations DPD be discontinued and be instead combined into the new Local Plan; and
- (4) delegated authority be given to the Chief Officer for Growth and Investment to make minor amendments as necessary to the Local Development Scheme and/or the Issues and Options document.

EXECUTIVE SUMMARY

In December 2022 Council agreed to proceed with a full update to the council's Local Plan.

Following the local elections in May 2023 and in light of proposed changes to national policy and legislation, members decided to seek expert advice on whether to continue with a full update to the local plan. Alternative options considered were to proceed only with a partial update to the local plan or to pause plan making and await changes to national planning policy and legislation.

Planning Services Working Group met on 27th July, 21st August and 14th September to consider these issues. At the meeting on 27th July, the invitation to which was extended to all members, presentations were received by the working group from planning consultants AECOM, WSP and barrister Hugh Richards of No.5 Chambers.

At its meeting on 14th September 2023 the Planning Services Working Group decided by majority after considering that expert advice, to recommend to Cabinet that it continue with the full update to the local plan and proceed with the first required stage of bringing forward a new plan, which is to consult on what the plan should contain.

This is the purpose of the ‘issues and options’ consultation. The proposed consultation document is Appendix 2a (with a short form, questionnaire version at Appendix 2b), while the consultation strategy is Appendix 4.

The proposed public consultation would run between Monday 30 October and Friday 22 December 2023.

As the issues and options consultation is delayed from the timing expected in December 2022, the Council needs to update its Local Development Scheme which sets out the development plan documents it intends to prepare (Appendix 1).

Finally, the December 2022 version of the Local Development Scheme included the Council’s intention to prepare a Gypsy and Traveller site allocations development plan document. An issues and options consultation and ‘call for sites’ for that document took place in October 2022. Unfortunately, no sites were put forward. The council is therefore unable to advance that document and needs to consider alternative options for bringing forward sites to meet the need for Gypsy and Traveller pitches.

Alternative options include authorising unauthorised sites with accompanying green belt changes, liaising with other public sector landowners to identify potential sites, the council acquiring a site itself, or co-allocating a site with a larger employment or housing allocation. These alternative options are most effectively advanced through the preparation of the wider Local Plan update.

It is therefore recommended that a updated Local Development Scheme is adopted which would confirm the discontinuance of preparation of a separate Gypsy and Traveller site allocations DPD.

1. INTRODUCTION

- 1.1. The Council has a statutory duty to review its local plan at least every five years and determine whether its policies need updating. At its meeting on the 14th December 2022 the Council agreed to undertake a full update of the Local Plan.
- 1.2. The first formal stage in the process of preparing a new plan is to undertake a Regulation 18 consultation. The Council has discretion over the format this consultation takes.
- 1.3. The Council has a legal duty to maintain an up-to-date local development scheme (LDS). The LDS is a project plan for producing local development documents, including the Local Plan. It sets out the local development documents that the Council intends to produce and the timescale for their preparation.
- 1.4. The current LDS was adopted in December 2022 but now requires amendment.
- 1.5. In October 2022 the Council consulted on a Gypsy and Traveller Issues and Options document and conducted a call for sites. This report provides an update on the outcome of that consultation and proposes how this can be taken forward.

2. PURPOSE

- 2.1. To update Cabinet on discussions that have taken place since the decision to proceed with a full plan update in December 2022.
- 2.2. To seek Cabinet approval is for an eight-week public consultation on the Local Plan Issues and Options document.
- 2.3. To seek approval to adopt a revised local development scheme that sets out the timeline for preparation of the new Local Plan and other planning policies.
- 2.4. To seek agreement that the preparation of the Gypsy and Traveller Site Allocations DPD is discontinued and this is instead combined into the new Local Plan.
- 2.5. The report includes the following appendices:
 - **Appendix 1** – Amended Local Development Scheme
 - **Appendix 2a** – Local Plan Issues and Options document
 - **Appendix 2b** – short-form, questionnaire version of Local Plan Issues and Options document
 - **Appendix 3** – Gypsy and Traveller Issues and Options Consultation Report
 - **Appendix 4** – Issues and Options Consultation Strategy
 - **Appendix 5** – Sustainability Appraisal Scoping Report
 - **Appendix 6** – Equality Impact Assessment
 - **Appendix 7** – Project Risk Register for the Local Plan update
 - **Appendix 8** – Climate Change and Environment Impact Assessment

3. NATIONAL PLANNING REFORM

- 3.1. Between 22nd December 2022 and 2nd March 2023 the government consulted on proposed changes to the National Planning Policy Framework and on how the transition to the new system of plan-making proposed to be introduced under the Levelling Up and Regeneration Bill might work.
- 3.2. A further consultation on the implementation of plan-making reforms took place between 25th July and 18th October 2023.
- 3.3. The Levelling Up and Regeneration Bill proposes a new plan-making process. A full review and update to national planning policy is also proposed, together with the introduction of national development management policies.
- 3.4. The latest consultation proposals are that the reforms will be implemented by autumn 2024. However, it is only expected that a small number of ‘front runner’ authorities will be able to commence preparing new style plans at that point, with most authorities beginning from summer 2025 or later. The government proposes that there will be a cut-off date of 30 June 2025 by which plans made under the current system would need to be submitted for examination.

- 3.5. At the time of writing, The Levelling Up and Regeneration Bill is undergoing its third reading in the House of Lords. The government has not yet responded to the consultation it undertook last winter, nor issued a new version of the NPPF. This represents a delay on the timetables the government previously set out and it is possible that the proposed timetables for implementing the planning reforms will similarly slip.
- 3.6. A general election will be held no later than 28th January 2025 and its outcome could also affect the currently proposed timetables for planning reform.

4. TAKING STOCK

- 4.1. As set out above on the 14th December 2022 Council decided to proceed with a full update to the current Rugby Borough Local Plan.
- 4.2. Considering the proposed changes to national planning legislation and policy and the change to the composition of the council following the May 2023 local elections to no overall control, members decided to pause and seek expert advice on how to proceed.
- 4.3. Planning Services Working Group met on 27th July, 21st August and 14th September to consider these issues. At the meeting on 27th July, the invitation to which was extended to all members, presentations were received by the working group from two independent planning consultants and a barrister. The presentations set out independent expert advice on the pros and cons of the different options open to the Council as to how to proceed.
- 4.4. It is considered that there are three realistic options open to the Council:

Option 1 – Cabinet recommends to Council that it continues with the full update to the local plan agreed in December 2022 and approves the Issues and Options document for an eight-week public consultation. This is the recommended option.

Option 2 – Cabinet recommends to Council that it does not proceed with the Issues and Options consultation at present and instead pauses preparation of an updated Local Plan. The Council would then await changes to national planning legislation and policy with a view to proceeding with a full plan update when the Levelling Up and Regeneration Bill's plan-making provisions are brought into effect (currently proposed to be summer 2025 at the earliest). This option would require an amended Local Development Scheme to be brought back to Cabinet and Council at the next available opportunity.

Option 3 – Cabinet recommends to Council that it pauses plan-making on a full plan update to wait for implementation of the planning reforms under the Levelling Up and Regeneration Bill (as per Option 2). In the meantime, Cabinet recommends to Council that it proceeds with a partial update to the Rugby Borough Local Plan 2011-2031 to cover Houses in Multiple Occupation, climate change and (to the extent permissible under a partial plan update) town centre regeneration policies only.

- 4.5. As the current Rugby Borough Local Plan 2011-2031 will be five years post adoption in June 2024 and the plan period ends in March 2031, it is not considered that delaying a full plan update indefinitely is a reasonable option. An indefinite delay would lead to the plan's policies becoming out of date.
- 4.6. Because, as detailed in section 8 below, no response was received to the Gypsy and Traveller DPD call for sites there is no realistic prospect that this standalone DPD can successfully proceed. For the same reason, advancing Gypsy and Traveller site allocations as part of the partial plan update (Option 3 above) is not identified as a realistic option.
- 4.7. The benefits and risks of the different options are summarised in the tables below.

Option 1 Continue with full plan update now
<p>Main benefits:</p> <ul style="list-style-type: none"> • Once a new plan is adopted, it would be five years before it would need to be reviewed again. • This is the quickest route to a comprehensive policy update, covering all areas. • Maintain control of development and where it is located by having an up to date plan and a 5 Year Housing Land Supply • The plan period would be extended to 2041 or beyond.
<p>Main risks:</p> <ul style="list-style-type: none"> • The biggest risk is created by the government's proposed 30 June 2025 deadline for submitting a plan for examination under the current plan-making system. That deadline would be difficult to meet and there is a risk that, if it is not changed, we will not meet it. If we fail to meet it, then there will be wasted money and effort. However, it is important to note that the deadline is not yet confirmed in legislation and nor are the transitional arrangements. There has already been delays to the Governments own timetable and the changes would not come into effect until Autumn 2024 which is likely to be after a general election. • Proceeding with an old-style plan now would mean that the authority would be one of the last authorities to adopt a new-style plan under the new system. That could have disadvantages if there are significant changes to national policies to which we would be unable to respond quickly.

Option 2 Pause plan-making to wait for implementation of changes to national policy and legislation
<p>Main benefits:</p> <ul style="list-style-type: none"> • There would be no risk of abortive work and spending. • The council could seek to be one of the first authorities to bring forward a new-style plan reflecting new government policy and legislation.
<p>Main risks:</p>

- The main risk of this option is that it could leave a long gap when the Council does not have an up-to-date plan. The likely earliest date for adopting a plan under the new system is 2028. That gap could grow in government planning reforms are further delayed. In that gap the Council would risk losing planning appeals for unplanned, speculative development. Fighting planning appeals could cost the Council significant money.
- Policies that need updating, including those on climate change, HMOs and town centre regeneration would not be updated until at the earliest 2028.
- The council would fall behind neighbouring councils who are progressing with full plan updates. This risks strategic regional decisions on housing and employment being made without our involvement.
- Government Ministers have also recommended against pausing, as has the legal advice sought by the Council.

Option 3 Pause plan-making as with option 2 and in the meantime bring forward a partial update to the Rugby Borough Local Plan 2011-2031 to cover Houses in Multiple Occupation, climate change and (to the extent permissible under a partial plan update) town centre regeneration policies only.

Main benefits:

- The short-term cost to the council would be lower than for proceeding with a full update because the requirements for evidence to support new policies would be less.
- A partial update would allow us to update climate change policy and policy for HMOs and (to the extent permissible under a partial plan update) town centre regeneration policies. Updates to other non-strategic development management policies could be included.

Main risks:

- Local plans are required to be examined and found 'sound' by a government-appointed planning inspector before they can be adopted. Because there is evidence of future increased housing and employment land need, there is a significant risk that a planning inspector would find that a partial plan update (which does not address these needs) is not justified. On that basis an inspector could find a partial update to be unsound.
- The Council would fall behind neighbouring councils who are progressing with full plan updates. This risks strategic regional decisions being made on housing and employment without our involvement.
- Proceeding with a partial update of the plan now would not remove the need to complete a full update before the current plan's end date in 2031. This would mean continuing work on a full update following the implementation of the government planning reforms (as with option 2). This option would involve advancing the partial and full update plans alongside each other and so would increase the long-run cost to the council of plan-making.
- A partial update would update some policies, but other important policies could become out of date and remain so until a full plan update is completed. As with

option 2, this would create a risk of those policies being overridden by unplanned, speculative development.

- As with option 1, there is a risk that the partial plan update would fail to meet the 30 June 2025 deadline, leading to wasted money and effort.

- 4.8. At its meeting on 14th September 2023 the Planning Services Working Group decided by majority, after considering the expert advice, to recommend to Cabinet that it continue with the full update to the local plan agreed by Council in December 2022 and proceed to the first formal stage of plan making.
- 4.9. Although it is recommended to continue with a full local plan update, it is recognised that in deciding how to proceed the Council faces a complex decision, with no obviously correct answer. Officers will keep Planning Services Working Group updated on future changes to national policy and legislation to allow the Working Group to advise the Council if it is necessary in future to change course.

5. ISSUES AND OPTIONS CONSULTATION

- 5.1. The first formal stage in the process of preparing a new plan is to undertake a Regulation 18 consultation on what the plan should contain. The Council has discretion over the format this consultation takes.
- 5.2. It is proposed that two Regulation 18 consultations are undertaken. The first consultation will be an 'issues and options' stage. The second, in 2024, will be a consultation on the draft plan. It is permissible to only undertake a single Regulation 18 consultation, but it is considered best practice to hold two.
- 5.3. The proposed Issues and Options document outlines and seeks comments on seven major planning issues to be addressed in the new plan: (1) land for employment uses (2) town centre regeneration (3) pitches for Gypsies and Travellers (4) houses in multiple occupation (5) climate change policies (6) design coding and guidance and (7) land for housebuilding. There is also a final section that allows respondents to submit comments in relation to other topics.
- 5.4. The consultation document does not seek to comprehensively cover all issues and policies that will form part of the new Local Plan. It is considered better to deal with detailed issues at the second 'draft plan' stage Regulation 18 consultation. This approach is also recommended because the government has indicated its intention to publish an updated National Planning Policy Framework. New policies will need to reflect those changes and so we should wait before setting out detailed policy proposals.
- 5.5. The consultation strategy is attached as Appendix 4. The consultation is proposed to run for eight weeks from Monday 30 October to Friday 22 December 2023. The consultation document will be published on the council's website and all organisations and individuals on the Council's planning consultation database will be notified. Copies of the consultation documents and displays will be available at libraries and in the town hall. The consultation will be publicised using the council's social media accounts.

- 5.6. In addition, ‘in person’ drop-in consultation events will be held, together with an online consultation event.

6. SUSTAINABILITY APPRAISAL SCOPING REPORT

- 6.1. The new Local Plan will need to be accompanied by a sustainability appraisal.
- 6.2. The first stage of that process is the publication of a sustainability appraisal scoping report. This is a factual, evidence-based document rather than a policy document. It outlines national and international policies that are relevant to the new local plan and provides a baseline analysis of the existing environmental, economic and social characteristics of Rugby Borough and key sustainability issues. It then uses this material to prepare a proposed sustainability appraisal framework which will be used later in the sustainability appraisal of the plan. The Sustainability Appraisal Scoping Report (Appendix 5) will be consulted on alongside the Issues and Options document.

7. LOCAL DEVELOPMENT SCHEME UPDATE

- 7.1. The most recent Local Development Scheme (LDS) came into effect in December 2022.
- 7.2. The principal reason to update the LDS is to remove references to the preparation of a separate Gypsy and Traveller Site Allocations Development Plan Document (DPD). This is explained in section 8 below.
- 7.3. Additionally, the LDS needs to be updated to reflect:
- (1) The delay in commencing the issues and options consultation in comparison to the timetable envisaged in December 2022, and
 - (2) The most recent information from government on the timetable for producing local plans. The Department for Levelling Up, Housing and Communities ‘Levelling-up and Regeneration Bill: reforms to national planning policy’ consultation (Dec 22-Mar 23) and the subsequent ‘Plan-making reforms: consultation on implementation’ (July 2023 and ongoing) set out the government’s proposed timetable for introduction a new style of local plan. The consultation sets out a timetable for plans to be adopted under the current system and a timetable for when the first plans under the new system will be commenced.

The consultation states that plans being prepared under the current system need to be submitted for examination before 30 June 2025 at the latest. Accordingly, the LDS has been amended to take account of this deadline.

8. GYPSY AND TRAVELLER SITE ALLOCATIONS DPD UPDATE

- 8.1. In October 2022 the Council consulted on a Gypsy and Traveller Issues and Options document and conducted a call for sites. No sites were put forward. A report on the responses received to that consultation is attached as Appendix 3.

- 8.2. The Gypsy and Traveller Site Allocations DPD was proposed to be prepared as a 'daughter' document to the existing Rugby Borough Local Plan 2011-2031. On 14 December 2022, Council decided to commence preparation of a new local plan. In this context, the Gypsy and Traveller Site Allocations DPD would be a stop gap plan. The Gypsy and Traveller Site Allocations DPD was timetabled to be adopted in September 2024, providing interim policy until the new Local Plan – which will need to meet Gypsy and Traveller accommodation needs over a longer time horizon – is adopted in 2026.
- 8.3. As no sites were put forward in response to the October 2022 consultation, it is now necessary to consider other options for identifying sites. Options include:
- authorising unauthorised sites with accompanying green belt changes, although this has not been successful to date as planning applications have been refused and this alone would be insufficient to meet the need;
 - liaising with other public sector landowners to identify potential sites, although the council does not have land available, and Warwickshire County Council has indicated it doesn't have land available for this purpose;
 - the Council acquiring a site; and/or
 - co-allocating a site with a larger employment or housing allocation which could only be done through a full update/ review of the local plan.
 - Discussions with neighbouring authorities through the duty to cooperate would also determine whether or not those authorities are able to contribute to meeting the need for pitches.
- 8.4. Overall, it is considered that a solution is most likely to be achieved through the preparation of the wider Local Plan update and that a standalone Gypsy and Traveller Site Allocations DPD would be unlikely to be able to be successfully advanced. Continuing with a separate Gypsy and Traveller Site Allocations DPD would not save time and would duplicate work.
- 8.5. An update to this effect was provided to Planning Services Working Party on 15 February 2023. The working party indicated its support for the allocation of sites to meet Gypsy and Traveller now being incorporated into the new Local Plan. Cabinet is now asked to agree to discontinue work on a separate Gypsy and Traveller Site Allocations DPD. This would be given effect by adopting an updated local development scheme (section 7 above).

9. CONCLUSION

- 9.1. An eight week 'issues and options' consultation is proposed as the first formal step in producing the new Local Plan.
- 9.2. For the reasons outlined above, it is considered that identifying sites to meet the accommodation needs of Gypsies and Travellers can now most effectively be advanced as part of the wider new Local Plan.

9.3. The Local Development Scheme is proposed to be updated to reflect this change and respond to the recent government consultation on the proposed longstop date for submitting plans for examination under the current system.

Name of Meeting: Cabinet
Date of Meeting: 23 October 2023
Subject Matter: Local Plan Issues and Options Consultation

Originating Department: Growth and Investment

DO ANY BACKGROUND PAPERS APPLY **YES** **NO**

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
1	Rugby Borough Local Plan 2011-2031, adopted June 2019 https://www.rugby.gov.uk/downloads/file/2319/local_plan_2011-31
2	Local Development Scheme, adopted December 2022 https://www.rugby.gov.uk/downloads/download/101/local_development_scheme
3	Council papers from 14 December 2022 https://www.rugby.gov.uk/meetings/meeting/1280/council
4	
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7	
8	

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Appendix 1 – Local Development Scheme



RUGBY BOROUGH COUNCIL
LOCAL DEVELOPMENT
SCHEME
2023 – 2026
OCTOBER 2023

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2. INTRODUCTION

- 2.1. The council must prepare a Local Development Scheme (LDS) which sets out the local development documents it intends to procure produce and the timetable for their preparation. The LDS helps local communities and interested parties keep track of progress and must be kept up to date.
- 2.2. The main development plan document for Rugby Borough is the Rugby Borough Local Plan 2011-2031 which was adopted on the 4 June 2019 which sets the overall development strategy for the borough until 2031.
- 2.3. This LDS runs until June 2026 to cover the period in which the Council expects to adopt a new local plan and approve a Community Infrastructure Levy charging schedule.

3. THE PREVIOUS LDS

- 3.1. The previous LDS was published in December 2022.

4. DEVELOPMENT PLAN DOCUMENTS

- 4.1. Development Plan Documents (DPDs) are defined in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and are used to guide the determination of applications for planning permission. They regulate the use of land in the public interest. They must be prepared in accordance with legal requirements, must be underpinned by evidence, and are tested at an examination in public run by a government appointed planning Inspector. Only when found 'sound' by the Inspector can they be adopted.

- 4.2. It is a legal requirement for DPDs to be subject to a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA).
- 4.3. The council intends to produce a new DPD, the updated Rugby Borough Local Plan. A timetable for a review of the Local Plan is set out below. Once adopted the new Local Plan will replace the current Rugby Borough Local Plan 2011-2031.

Stage	Date
Issues and options consultation (Regulation 18)	November – December 2023
Preferred options consultation (Regulation 18)	July 2024
Pre-submission consultation (Regulation 19)	January 2025
Submission for examination	June 2025
Adoption by	By 31 st December 2026

5. NEIGHBOURHOOD PLANS

- 5.1. Neighbourhood plans are prepared by parishes or designated neighbourhood forums. They are subject to a statutory preparation procedure and are required to be independently examined before they can be ‘made’. Once made, neighbourhood plans become part of the development plan for the area.
- 5.2. A list of made neighbourhood plans can be found on the council's website: https://www.rugby.gov.uk/homepage/49/neighbourhood_planning
- 5.3. The following areas have been designated as neighbourhood areas for the purposes of preparing a neighbourhood plan:

Clifton-upon-Dunsmore Parish
 Grandborough Parish
 Dunchurch Parish
 Wolston Parish
 Newton and Biggin Parish

6. COMMUNITY INFRASTRUCTURE LEVY CHARGING SCHEDULE

- 6.1. Rugby Borough Council is preparing a Community Infrastructure Levy (CIL) charging schedule. The draft charging schedule was subject to consultation in August 2023. The next stage will be for the charging schedule to be submitted for independent examination. If the independent examiner finds that the charging schedule meets the basic conditions, then the council will be able to proceed to approve it and bring it into force.
- 6.2. CIL is a charge on new developments to support the provision of local infrastructure to support development.

7. SUPPLEMENTARY PLANNING DOCUMENTS

- 7.1. Supplementary Planning Documents (SPDs) add detail to the policies of the Local Plan but are not development plan documents. They are a material consideration in the determination of planning applications. They are required to be prepared in accordance with a statutory process and in consultation with the public. SPDs are not required to be examined before they can be adopted.
- 7.2. It is no longer a requirement to detail SPDs and the timetable for their preparation within the LDS. A full list of adopted SPDs can be found on the council's website: https://www.rugby.gov.uk/directory/25/our_planning_strategies_policies_and_evidence/category/92

8. MONITORING AND REVIEW

- 8.1. Local planning authorities are required to produce an annual authority monitoring report to assess the implementation of the LDS and the extent to which policies in local development documents are being achieved. The authority monitoring report is based upon the period 1st April to 31st March in each year.

9. CONTACT DETAILS

- 9.1. For more information about any of the issues raised in this Local Development Scheme please contact:-

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

Tel: 01788 533828
Email: Localplan@rugby.gov.uk

- 9.2. This document together with all other local development documents produced by Rugby Borough Council will be made available on the Council's web site: www.rugby.gov.uk

Appendix 2a – Issues and Options document



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

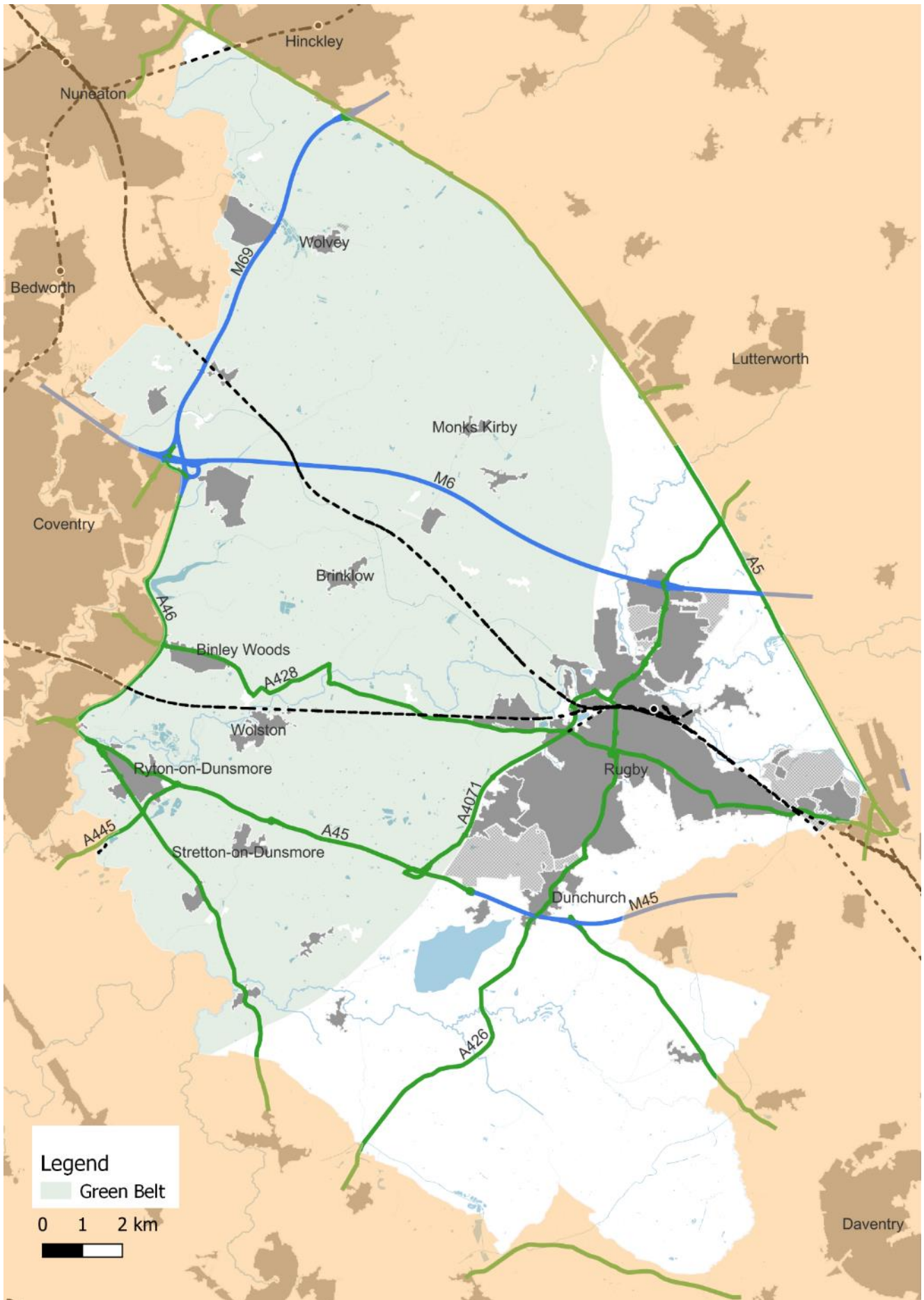
Agency), alongside Warwickshire County Council.

- 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: [\[insert link\]](#).

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: [\[insert link\]](#) 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. The method for our HELAA is set out here [\[insert link\]](#).

HOW DO I RESPOND?

2.35. Responses to this consultation must be received no later than [\[date\]](#). You can respond on our website at the following address: [\[insert\]](#).

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

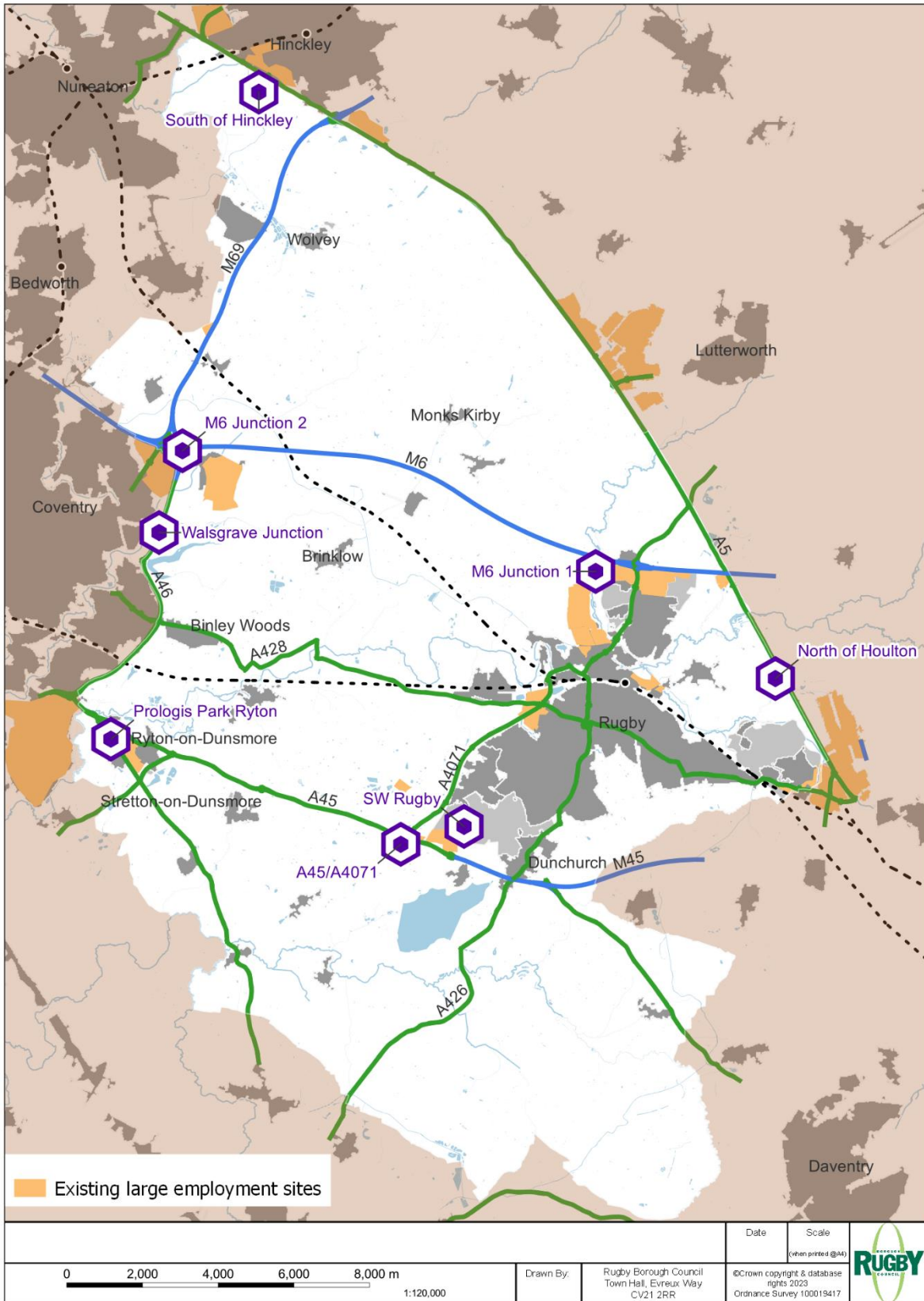
WHERE ARE POTENTIAL LOCATIONS FOR EMPLOYMENT LAND?

- 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:

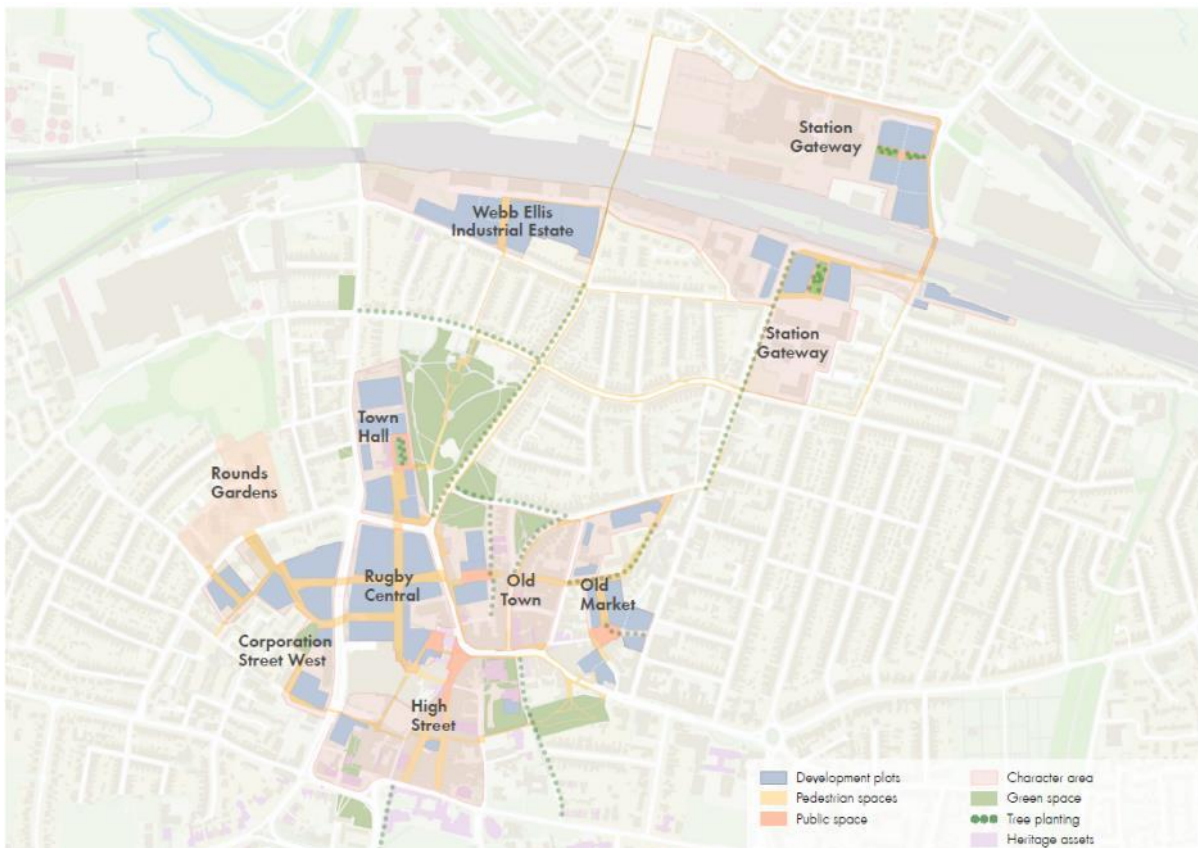
- Deleting primary and secondary shopping frontage policies, which require a specified percentage of units in the identified frontages to be in the former A1 (retail) use class.

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.

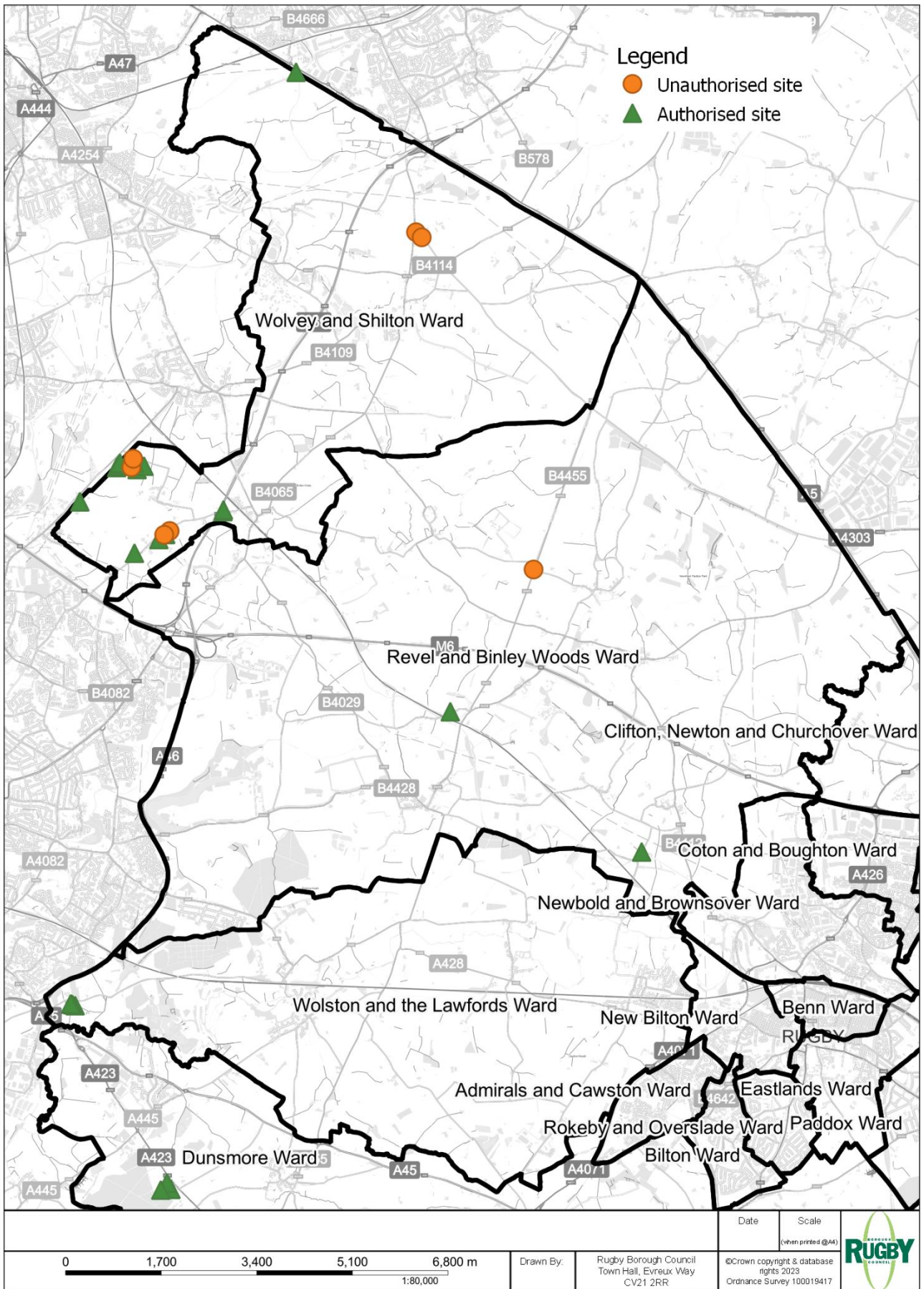
5.4. In September 2022 we published our [Gypsy and Traveller Accommodation Assessment Study](#) (GTAA). This study was produced through engagement with the Gypsy and Traveller community. It shows the need for pitches in the period 2022-2037 in five-year tranches.

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?

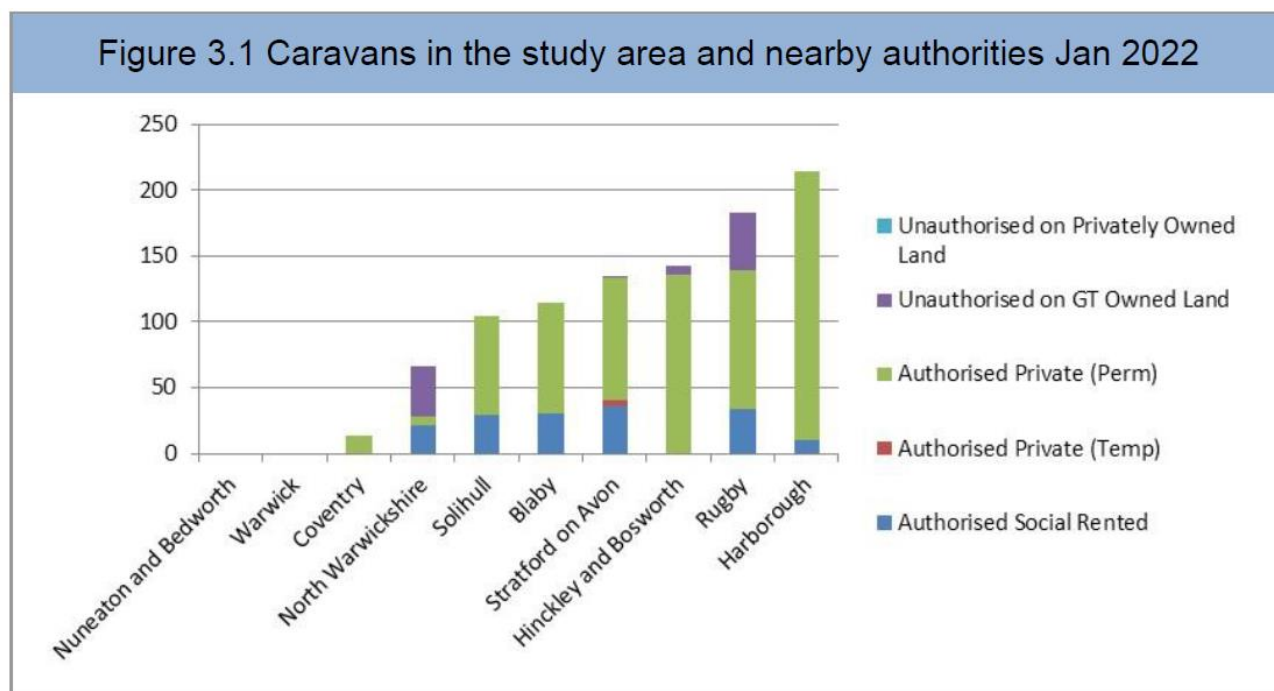
- 5.11. Between October and November 2022 we consulted on issues and options for a proposed Gypsy and Traveller DPD. At the same time, we ran a 'call for sites' asking landowners to put forward land for Gypsy and Traveller sites. No sites were put forward in response to that consultation.
- 5.12. Because 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

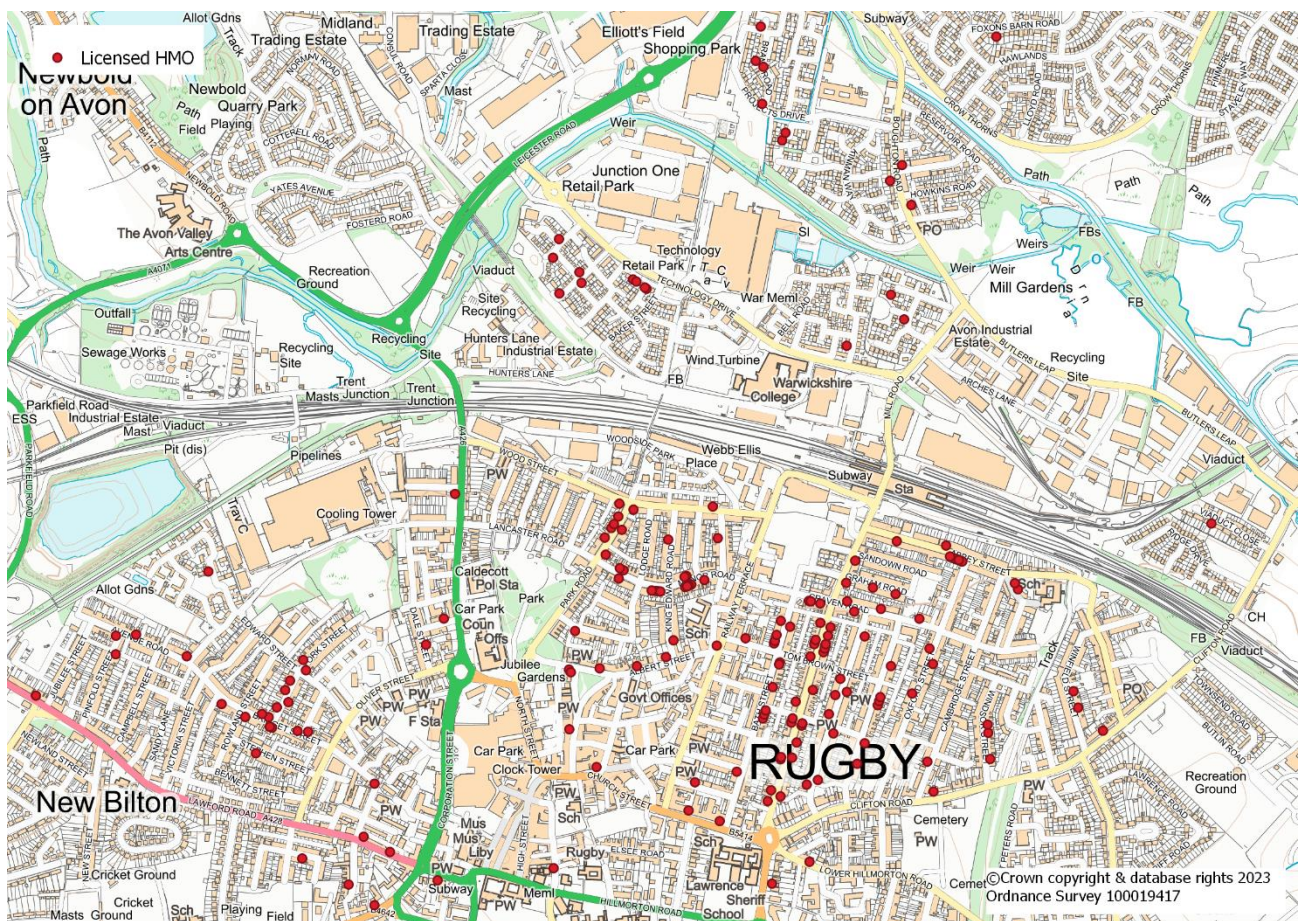
WHAT IS THE ISSUE?

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

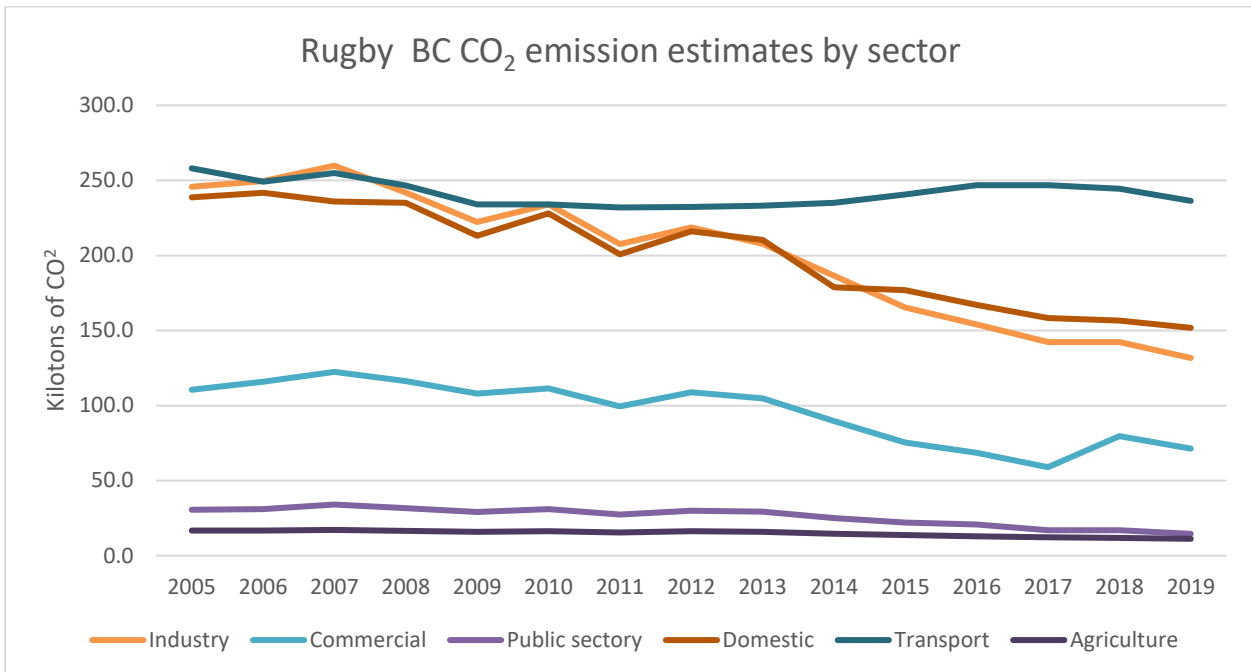
7. CLIMATE CHANGE POLICIES

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? Is 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

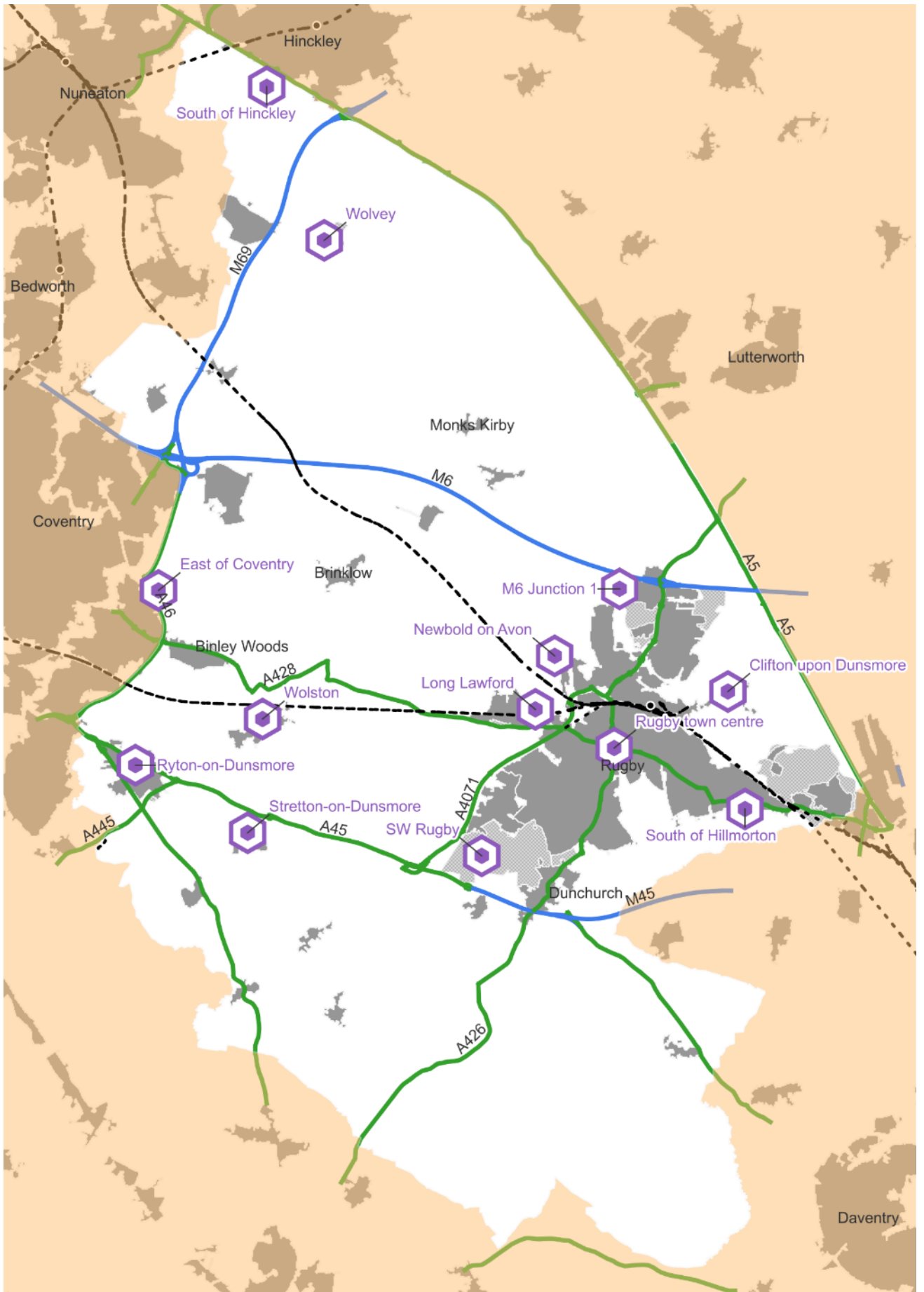
Scenario	Minimum local housing need	HEDNA 2022
Houses each year	506	735
Total Houses 2021 to 2050 (29 years)	14,674	21,315
Total houses 2021 to 2050 with 10% supply buffer	16,141	23,447
Total supply already identified	15,346	15,346
Supply still needing to be found	795	8,101

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?

Appendix 2b – short-form, questionnaire version of Local Plan Issues and Options document

Land for employment uses

We now have new, longer-term projections for the need for land for employment uses (offices, research and development, industrial and warehousing).

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 Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022 shows three components of future need for employment land. These are shown in the table below:

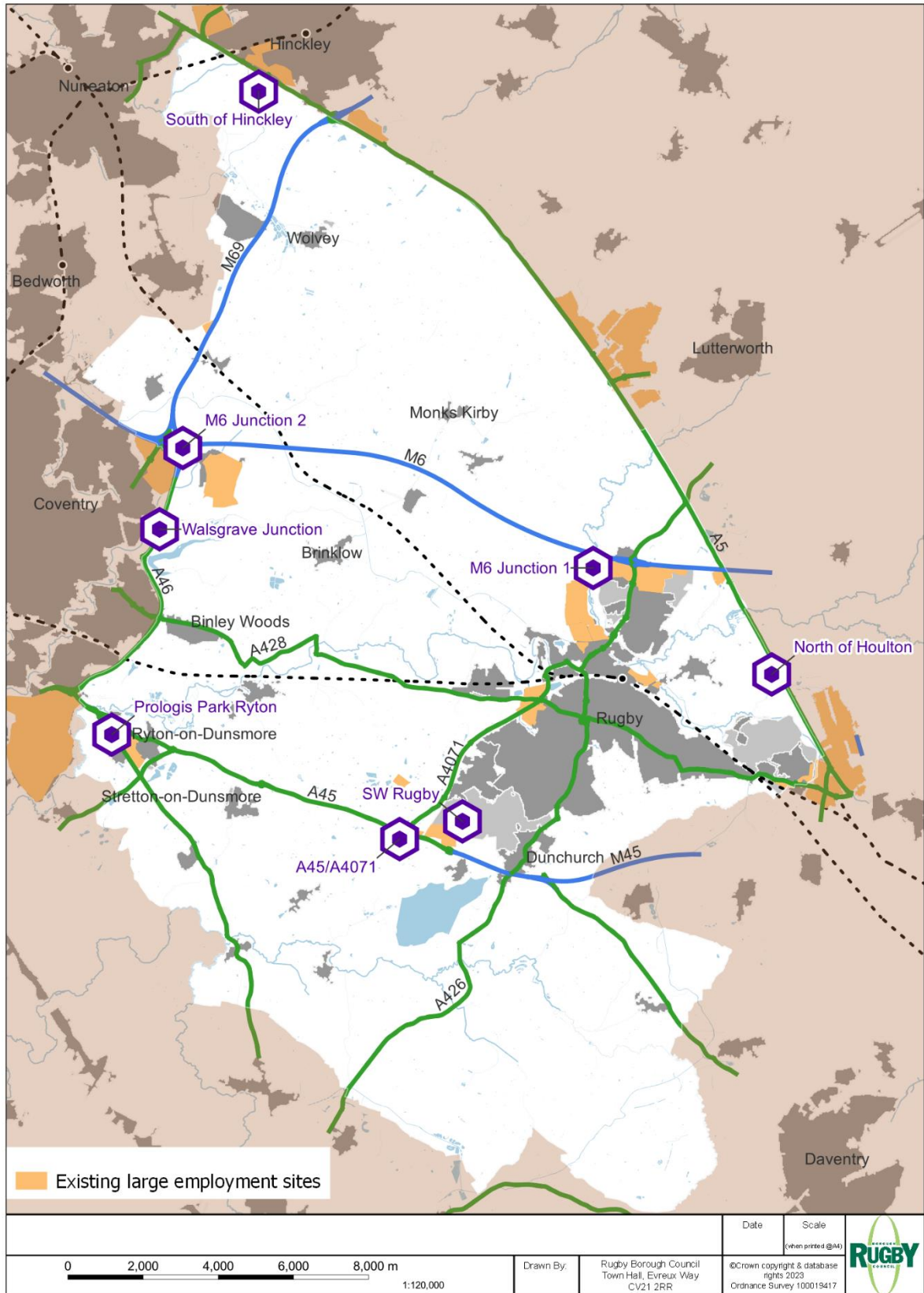
Type of employment land	Land needed 2021-2041 (in hectares)	Land needed 2021-2050 (in hectares)
Gross requirement for strategic warehousing land across Coventry and Warwickshire (this means land for warehouses of over 9,000m ² in floor area)	551ha	735ha
Net need for office land (Rugby Borough only)	5.2ha (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

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

We need to decide where to accommodate future employment land demand. 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.

Large scale employment locations should be close to existing settlements to allow staff access to work.

Considering these restrictions, we have identified the potential locations shown on the map below.



Potential strategic employment locations

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

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.

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?

Most of the broad locations shown on the map above lie within the Green Belt. We will consider whether there are exceptional circumstances which justify alterations to the Green Belt.

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

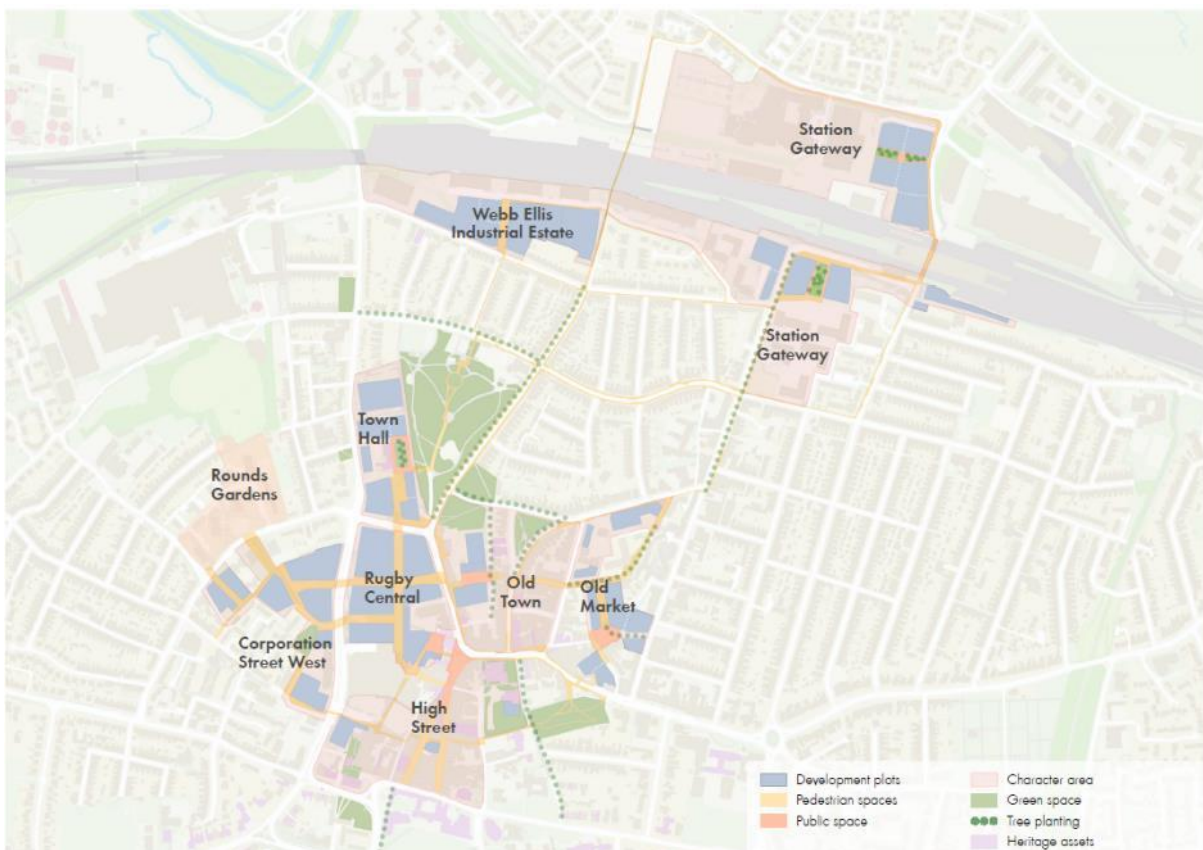
Town centre regeneration

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.

Considering this change, we propose 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. We don't think this policy is workable following the introduction of the Class E use class.

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

We propose to introduce 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.



Rugby Regeneration Strategy map of potential development parcels

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

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?

Currently the only town centre defined on the Local Plan policies map is Rugby town centre. No district or local centres are shown.

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.

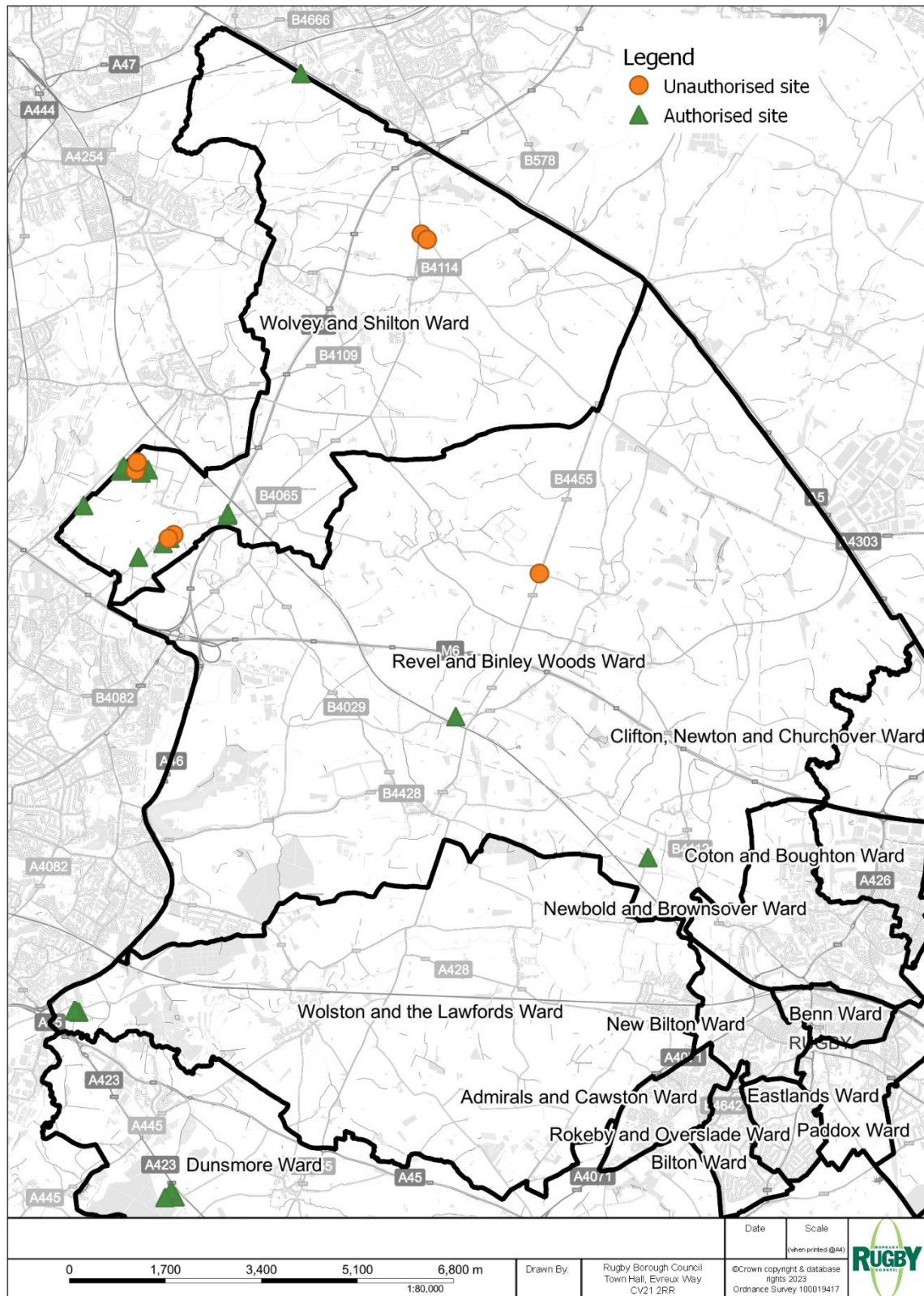
Rugby Borough has several local centres outside of Rugby town centre. Examples include Dunchurch, Clifton Road, Hillmorton High Street, Paddox, Bilton Main Street, Brownsover, Woodlands and Coton Park. There are other centres, not listed here that could also be considered.

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

11. Are there other things the local plan should do to support local town centre regeneration?

Pitches for Gypsies and Travellers

We need to find pitches for Gypsies and Travellers to meet future needs.



Existing Gypsy and Traveller Sites

In September 2022 we published our Gypsy and Traveller Accommodation Assessment Study (GTAA).

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.

The second method used in the GTAA is the government's Planning Policy for Traveller Sites 2015 definition (PPTS). 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. It excludes those who have permanently stopped travelling.

The High Court has found the PPTS 2015 definition to be discriminatory, but it has not been withdrawn and remains government policy.

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

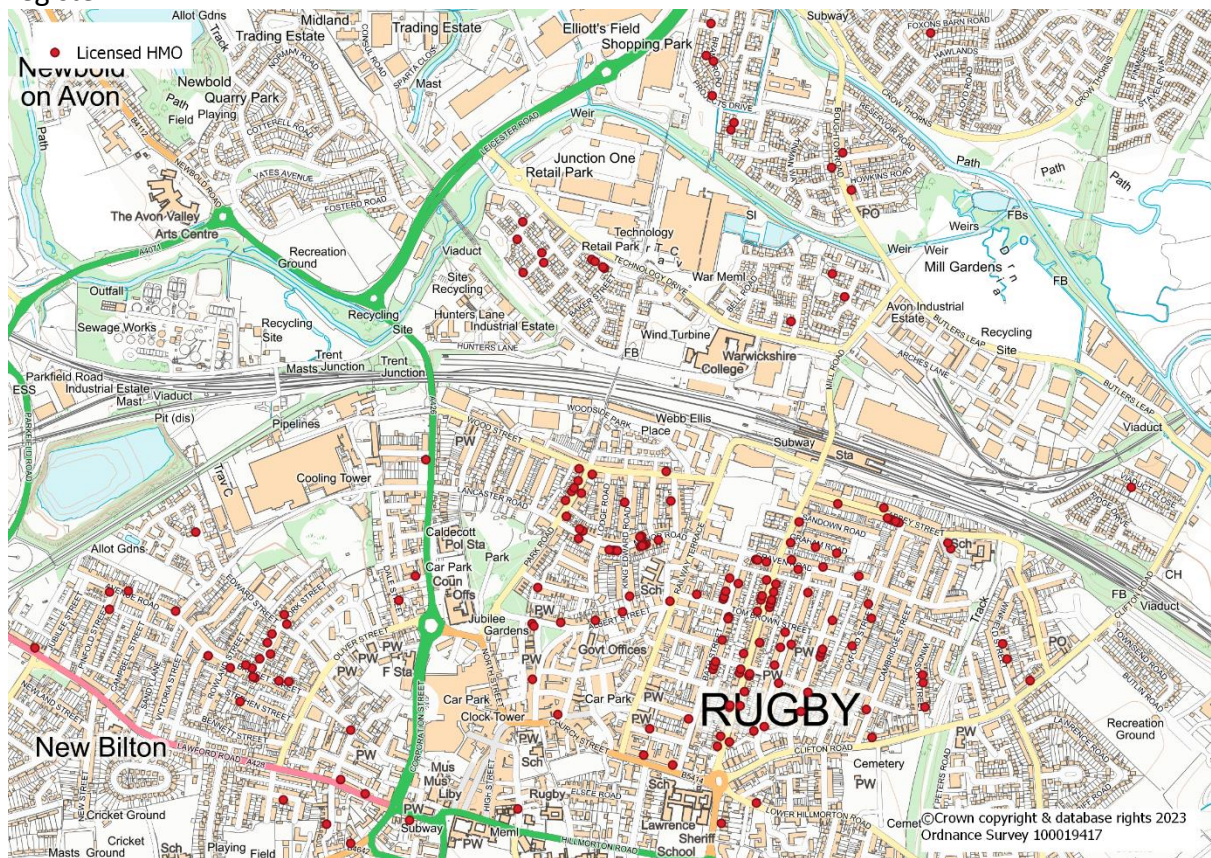
12. The council proposes to plan for Gypsy and Traveller pitches based on the ethnic need target of 79 pitches 2022-2037 identified in the GTAA 2022. Do you agree?
13. How can we find sites to accommodate the need for Gypsy and Traveller pitches?
 - (a) Allocate sites for Gypsy and Traveller pitches 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.

Houses in Multiple Occupation

Houses in Multiple Occupation (HMOs) are homes occupied by three or more unrelated individuals who share basic amenities such as a kitchen or bathrooms.

Rugby town has experienced growth in the number and concentration of HMOs, particularly within areas of central Rugby. The current Local Plan 2011-2031 is silent on HMOs. There is a desire to introduce a policy on HMOs through the new local plan.

As of February 2023, there were 199 licensed HMOs in Rugby Borough as shown on the map below. Not all HMOs are licensed, as HMOs with fewer than five residents do not have to register.



HMOs in central Rugby

Nationally, concerns have been raised about concentrations of HMOs reducing community cohesion, putting pressure on parking, having untidy front gardens and bins, causing noise and disturbance, and increasing local rents. There is concern among councillors and residents in affected wards about these issues.

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?

Climate change and Zero Carbon energy

Increasing renewable and zero carbon energy generation reduces carbon emissions, energy prices and our reliance on imported gas.

Our main renewable energy options are solar farms and wind farms.

The current Rugby Borough Local Plan does not show any areas as suitable for wind farm development. This means that at present new wind farms in the borough are blocked.

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 and wind farms in these areas would only be granted if very special circumstances can be shown to exist.

We could take a more supportive stance to both solar and wind energy by 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.

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.

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 RBC 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?](#)

One option for updating our environmental policies would be for us to set a policy requiring new developments to increase tree canopy cover. Cornwall Council, for example, requires canopy coverage equal to at least 15% of the site area to be provided in all major developments.

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.

21. [Should we adopt a minimum tree canopy policy for new development?](#)

From November 2023 the Environment Act 2021 will introduce a requirement that development sites deliver at least a 10% enhancement on the pre-development biodiversity

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.

In our new local plan, we could 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. If we don't specify priorities, potentially, net gain could occur in other counties and not within our borough.

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, if so, where?](#)
23. [Would you support the creation of an additional country park 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?](#)

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).

In 2025 the government will implement through the Building Regulations the full Future Homes Standard (FHS) and Future Buildings Standard (FBS). 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.

Local policies can require buildings to be 'net zero' now. This is achieved by setting more stringent building energy performance standards 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.

25. [We are considering requiring all residential developments to be net zero. Do you agree?](#)
26. [We are considering requiring all non-residential development to be net zero. Do you agree?](#)
27. [Are there other climate change policies we should be introducing?](#)

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.

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

Design

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. Design codes can also be introduced through Neighbourhood Plans.

One of the tools the government is promoting is the use of design codes. A design code is a set of illustrated design requirements that set specific, detailed parameters for the physical development of a site or area. This approach was supported, for example, in the *Building Better, Building Beautiful* Commission's report.

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 example 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)

Land for housebuilding

We have two different projections for how many new homes a year we could plan for in the next plan.

One is the government's standard method, the other is the Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA). The HEDNA uses more up to date information (including Census 2021) than the standard method which is based on 2014 data. The more up to date data shows higher population growth in Rugby and lower population growth in Coventry.

The difference between the projections for the number of homes we will need each year is shown in the table below. For comparison, under our current plan we are planning for 620 new homes each year.

	Coventry	Rugby	Total for Coventry and Warwickshire
Standard method	3,247	506	5,602
HEDNA 2022	1,964	735	4,906

The HEDNA shows a higher need in Rugby but a lower need in Coventry and in Warwickshire as a whole. Adopting the HEDNA number across Warwickshire would reduce the likelihood of us needing to accommodate unmet needs from Coventry, as we did in the current plan.

We already have a lot of new homes in the pipeline, particularly at the South West Rugby and Houlton urban extensions. Taking the existing supply into account, here is the additional housing supply that we would need to allocate land for:

	Standard method	HEDNA 2022
If we plan to 2041...	0	3,114
If we plan to 2050...	795	8,101

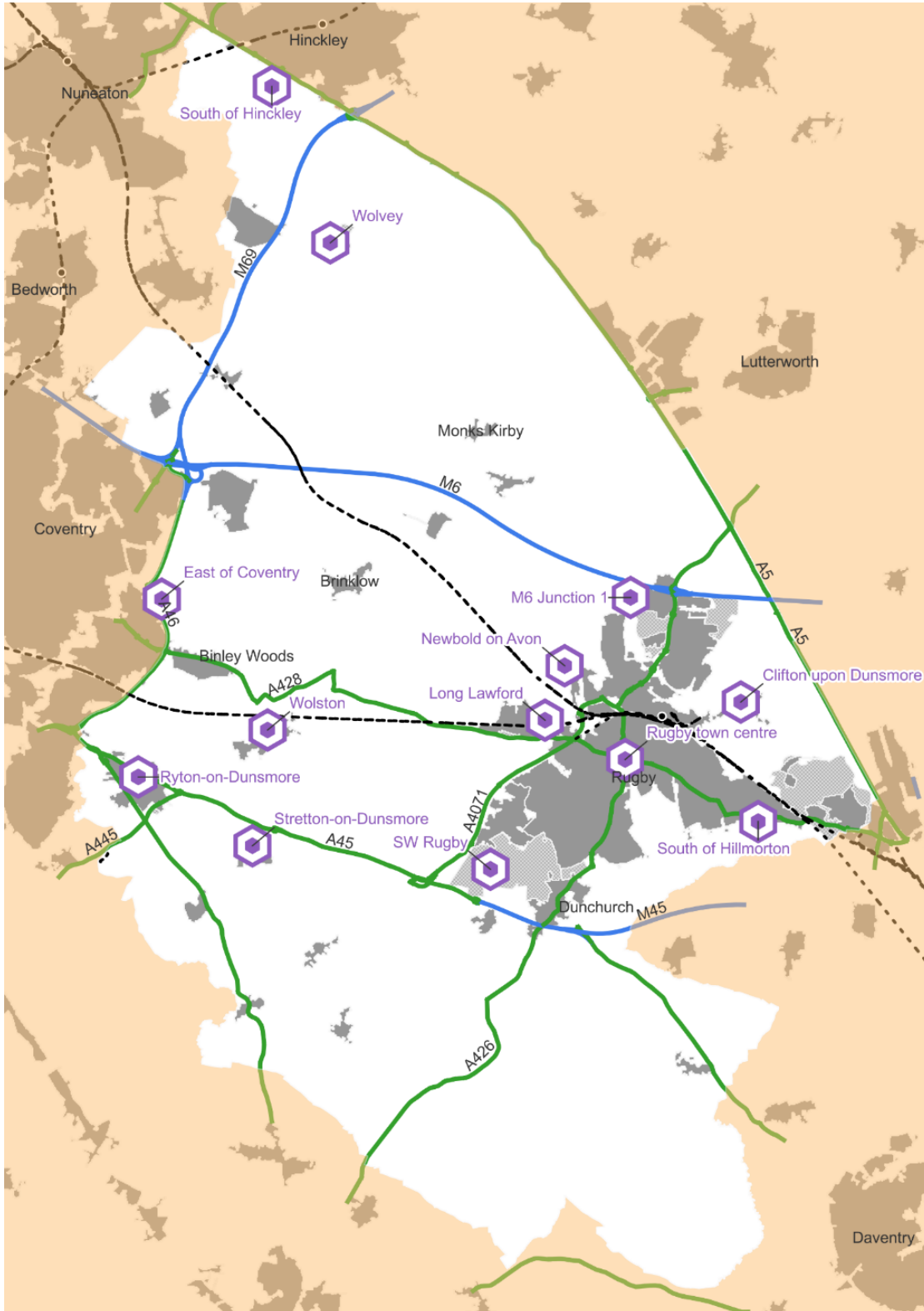
31. How many homes should we be planning for?

- (a) Minimum local housing need
- (b) The HEDNA 2022 need
- (c) Other (please specify)

The HEDNA sets out the need for social and affordable housing within the borough.

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

We do not know yet which land will be put forward as potentially suitable for housing development. The below map shows some of the broad locations in which housing could be built.



Potential housing locations

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?

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 to meet the higher M4(3) wheelchair user dwelling standards (with a higher proportion needing to meet this standard in the affordable sector).

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 comments you have on the type and size of new homes we need.

Other topics

The issues and options document focusses 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.

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.

We are also considering introducing a policy to protect stadia as community and sports facilities.

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?

Appendix 2 – Report on Gypsy and Traveller Issues and Options Consultation



**GYPSY & TRAVELLER ISSUES &
OPTIONS
REPORT ON CONSULTATION
AUGUST 2023**

1. INTRODUCTION

- 1.1. The Rugby Borough Local Plan (2011-2031) was adopted in June 2019. It contains policy DS2 which sets out the level of provision required to meet needs for the Gypsy and Traveller community. It also sets out criteria against which applications will be judged. The supporting text to the policy sets out the council's intention to produce a development plan development (DPD) to allocate sites to meet Gypsy and Traveller accommodation needs.
- 1.2. As the first step to producing that DPD, the council undertook an 'Issues and Options' consultation. The six-week consultation took place from the 7th October to 18th November 2022. An advert was placed in the Rugby Observer and those on Rugby Borough Council's planning consultation database were notified by email/letter. The Issues and Options paper was accompanied by a call for sites to seek sites to meet the need for pitches identified by Policy DS2. A sustainability appraisal of the Issues and Options paper was undertaken by Land Use Consultants and was consulted on alongside the Issues and Options paper.

2. RESULTS

- 2.1. The call for sites resulted in no sites being put forward for assessment of their suitability for Gypsy and Traveller pitches. The Issues and Options paper received nine responses from the following categories of respondents.

Consultee type	No.
Statutory consultees	3
Parish councils	3
Neighbouring local authorities	2
Members of the public	1

- 2.2. Although the Issues and Options Paper (see Appendix 1 below) set out a series of questions, several respondents chose instead to make general comments.
- 2.3. The Coal Authority did not make detailed comments but offered access to a database of former coal sites once potential site allocations have been identified. Likewise, National Highways did not make detailed comments but indicated their desire to assess the impact on the highway network once potential site allocations had been identified. Historic England provided links to standing advice they give to local planning authorities on assessing the impact of sites on heritage assets.
- 2.4. The member of the public raised general concerns around amenity, traffic, noise, crime, clean-up costs, impact on business and impact on schools.
- 2.5. Stratford on Avon District Council made general comments stressing their willingness to work jointly on issues around transit provision and emergency stopping places.
- 2.6. The three parish councils (Monks Kirby, Shilton and Barnacle, Wolvey) and Hinckley and

Bosworth Borough Council responded to the Issues and Options questions.

3. RESPONSES TO THE ISSUES

Issue	Shilton & Barnacle PC	Monks Kirby PC	Wolvey PC	Hinckley & Bosworth BC
1 - Level of provision	Option 1a. The level of provision identified in DS2.	Option 1a. The level of provision identified in DS2.	Option 1a. The level of provision identified in DS2.	Option 1a. The level of provision identified in DS2.
2 - Provision for Travelling showpeople	Option 1. No need identified that needs to be planned for.	Option 1. No need identified that needs to be planned for.	Option 1. No need identified that needs to be planned for.	Option 1. No need identified that needs to be planned for.
3 - Transit Accommodation	Option 2. Negotiated stopping policy that is enforced.	Option 1. Approach set out in RRR 2022 update.	Option 1b. Up to 10 pitches on arterial routes.	Plan for 1 transit site of up to 10 pitches but may need a negotiated stopping places policy.
4 - Location of Residential Pitches	Combination of options 4 and 5. New allocations around larger settlements. Impact of increasing provision in existing areas would be unacceptable.	Option 4. Locate around Rugby and main rural settlements.	A combination of approaches, allocate on new sites, small expansion of existing authorised sites, assessment of unauthorised sites to see how many would be acceptable.	Try to extend or intensify then allocate new.
5 – Location of transit pitches	Option 3. Sites close to Rugby and on main routes.	Option 1. Sites close to Rugby, failing that option 3, close to Rugby and along arterial routes.	Option 3. Sites close to Rugby and on main routes.	Option 2. Along new transit routes.

Issue	Shilton & Barnacle PC	Monks Kirby PC	Wolvey PC	Hinckley & Bosworth BC
6 – Size of sites	Option 2. Smaller sites integrate better.	Option 3. Site size will be driven by family need.	Option 3. Site size will be driven by family need.	Option 3. Site size should reflect identified need.
7 – Design standards	Option 1a. Suggested design standards appropriate but need to be enforced.	Option 1a. Suggested design standards appropriate.	Option 1a. Suggested design standards appropriate.	Option 1a. Suggested design standards appropriate.
8 – Site criteria	The existing criteria are fine but need to be enforced by RBC. The availability and achievability criteria should not outweigh other criteria.	No comment.	Option 1. Existing criteria are fine.	Add a new criteria about safe walking routes.
9 – Sustainability Appraisal	No comment.	Option 1. SA is appropriate.	No comment.	Option 1. SA is appropriate.
10 – Any other issues	Issue of Gypsy and Traveller provision has been left for too long. RBC haven't taken enforcement action and made problem worse.	Issue of Gypsy and Traveller provision has been left for too long. RBC haven't taken enforcement action and made problem worse.	Issue of Gypsy and Traveller provision has been left for too long. RBC haven't taken enforcement action and made problem worse. Needs to be resolved.	May need to consider affordable provision.

APPENDIX 1 - ISSUES AND OPTIONS QUESTIONS

Issue 1 – Gypsy and Traveller Accommodation Need

Option 1 – Should the Council be planning for the level of permanent residential pitches according to:

- (a) the PPTS 2015 definition identified in the 2022 GTAA; or
- (b) the Ethnic definition identified in the 2022 GTAA?

Option 2 – Should the Council be planning for a higher level of permanent residential pitches than that identified in the 2022 GTAA (either the Ethnic definition or the PPTS 2015 definition), if so, what evidence do you have to justify this need?

Option 3 – Should the Council be planning for a lower level of permanent residential pitches than that identified in the 2022 GTAA (either the Ethnic definition or the PPTS 2015 definition), if so, what evidence do you have to justify this need?

Option 4 – Should the Council plan for a longer time period than up to 2037 (For example up to 2042)? Give reasons

Option 5 – Is there another approach to identify the Gypsy and Traveller accommodation need that the Council should consider? Please provide details of this approach in your response.

Issue 2 – Travelling Showpeople Accommodation Need

Option 1 – Should the Council be planning for any yards for Travelling Showpeople given that the latest GTAA identified no resident Travelling Showpeople in the Borough?

Option 2 – Is there another approach to identify the Travelling Showpeople need that the Council should consider? Please provide details of this approach in your response.

Issue 3 – Transit Accommodation Need

Option 1 – a) Should the Council be planning for transit/emergency stopping sites in Rugby Borough as identified in the 2022 GTAA?

Option 1 – b) Should the size of the transit/emergency stopping sites be 6-10 pitches as per the GTAA? If not, should the size be higher or lower?

Option 2 – Should the Council develop a negotiated stopping policy for Gypsy and Travellers as per the GTAA?

Option 3 – Is there another approach to the provision of transit/ emergency stopping sites that the Council should consider? Please provide details of this approach in your response.

Issue 4 – The Location of Permanent Residential Pitches

Questions:

1. Of the permanent residential pitch options outlined below which one would be the best approach?
2. Could a combination of options be used until the need is met, and if so, which options?
3. Are there any other realistic and reasonable ways in which future permanent residential pitch requirements may be met? If so, please explain in your response.

Option 1 – Increase capacity on existing authorised sites, where possible.

Option 2 – Expansion of the site area of existing authorised sites, where possible.

Option 3 – Increase capacity/ expand existing authorised sites outside of Wolvey and Shilton ward, and Dunsmore ward?

Option 4 – Allocation of new sites around the outskirts of Rugby town and the Main Rural Settlements as identified in Policy GP2 of the Rugby Borough Local Plan with good access to services and facilities.

Option 5 – Allocation of new sites in more rural areas (Rural Villages and Countryside), but still with reasonable access to essential services. [Contrary to Policy GP2]

Issue 5 – Location of Transit Pitches

Location of Transit Pitches

Q1 – Which option do you consider is the best approach for locating transit pitches within the Borough?

Option 1 – Transit sites close to Rugby (each consisting of 6-10 pitches) per site.

Option 2 – Transit sites near to main arterial routes e.g. M45 or the M6 (each consisting of 6-10 pitches). The exact location would need to be informed by detailed discussions with the Local Highway Authority.

Option 3 – a combination of sites close to Rugby and on main arterial routes

Option 4 – Combined residential/ transit pitches where provision for one or two pitches are provided for in conjunction with new permanent residential pitch provision.

Issue 6 – Size of sites

Option 1 – Provide fewer larger permanent sites to accommodate, for example, no more than 10 pitches each.

Option 2 – Provide a greater number of smaller sites to accommodate, for example, no more than 2 pitches each.

Option 3 – Is there another approach to the size of sites? Please provide details of this approach in your response.

Issue 7 – Design Standards

Option 1 A – Design standards should be set for all Gypsies, Travellers and Travelling Showpeople sites. The design standards set out in Table 1 are appropriate.

Option 1 B - Design standards should be set for all Gypsies, Travellers and Travelling Showpeople sites. However, the design standards set out in Table 1 are not appropriate. Please explain what you consider to be appropriate design standards.

Option 2 – Given the diversity of sites and locations it is not possible to set design standards. Please explain your response.

Issue 8 – Site assessment criteria

Option 1 – Do you agree with the existing suitability criteria listed in Policy DS2 of the adopted Rugby Borough Local Plan 2011-2031?

Option 2 – Should some, or all, of the existing suitability criteria listed in Policy DS2 be deleted or amended, and if so, which criteria? Please explain your response.

Option 3 – Should new criteria be added to the existing suitability criteria in Policy DS2? Please explain your response.

Option 4 – Do you agree with the availability and achievability criteria in Paragraph 6.2 above? Please explain your response.

Option 5 – Should the suitability criteria in Policy DS2 and the availability and achievability criteria in Paragraph 6.2 above be used for transit sites? If not, please explain in your response why not and if you think another approach should be used instead.

Issue 9 – Sustainability Appraisal of the Issues and Options

Option 1 – The Sustainability Appraisal of the Issues and Options is appropriate.

Option 2 – The Sustainability Appraisal of the Issues and Options is inappropriate. Please explain in your response why you consider the SA is inappropriate and provide details of how you think it should be amended.

Issue 10 – Any other issues

Are there any other issues that this Issues and Options consultation document has not identified that need to be considered as part of the preparation of the Rugby Borough Gypsy and Traveller Site Allocations DPD?

Appendix 4 – Consultation Strategy

Rugby Borough Local Plan Review – Issues and Options

Public Consultation Strategy

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

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

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

Appendix 5 – Sustainability Appraisal Scoping Report



**RUGBY BOROUGH LOCAL PLAN
SUSTAINABILITY APPRAISAL –
SCOPING REPORT
OCTOBER 2023**

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2. INTRODUCTION

WHAT IS A LOCAL PLAN?

- 2.1. Rugby Borough Council is currently producing a new local plan which will replace the Rugby Borough Local Plan 2011-2031 (adopted June 2019). The new Local Plan will set out the vision, objectives, planning policies and site allocations that will guide development up to 2041. As part of the review, the Council is required to undertake a Sustainability Appraisal (SA) of the Local Plan.
- 2.2. The purpose of the SA is to promote sustainable development by assessing the extent to which the Local Plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic, and social objectives. The SA can result in changes to site allocations and planning policies to make them more sustainable and/or recommended options that can mitigate the identified impacts.
- 2.3. The legal requirement to undertake SA during the preparation of a local plan comes from Section 19 of the Planning and Compulsory Purchase Act 2004. Paragraph 32 of the National Planning Policy Framework (NPPF) sets out the requirement for local plans to be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements.
- 2.4. The SA should demonstrate how the plan has addressed relevant economic, social and environmental objectives including opportunities for net gains. Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed or, where this is not possible, compensatory measures should be considered.
- 2.5. The government's national Planning Practice Guidance (PPG) amplifies the guidance in the NPPF and sets out advice about how sustainability appraisal should be undertaken, detailing the key stages of the process and how they relate to the preparation of a local plan. This process is shown in Figure 1 on the following page.

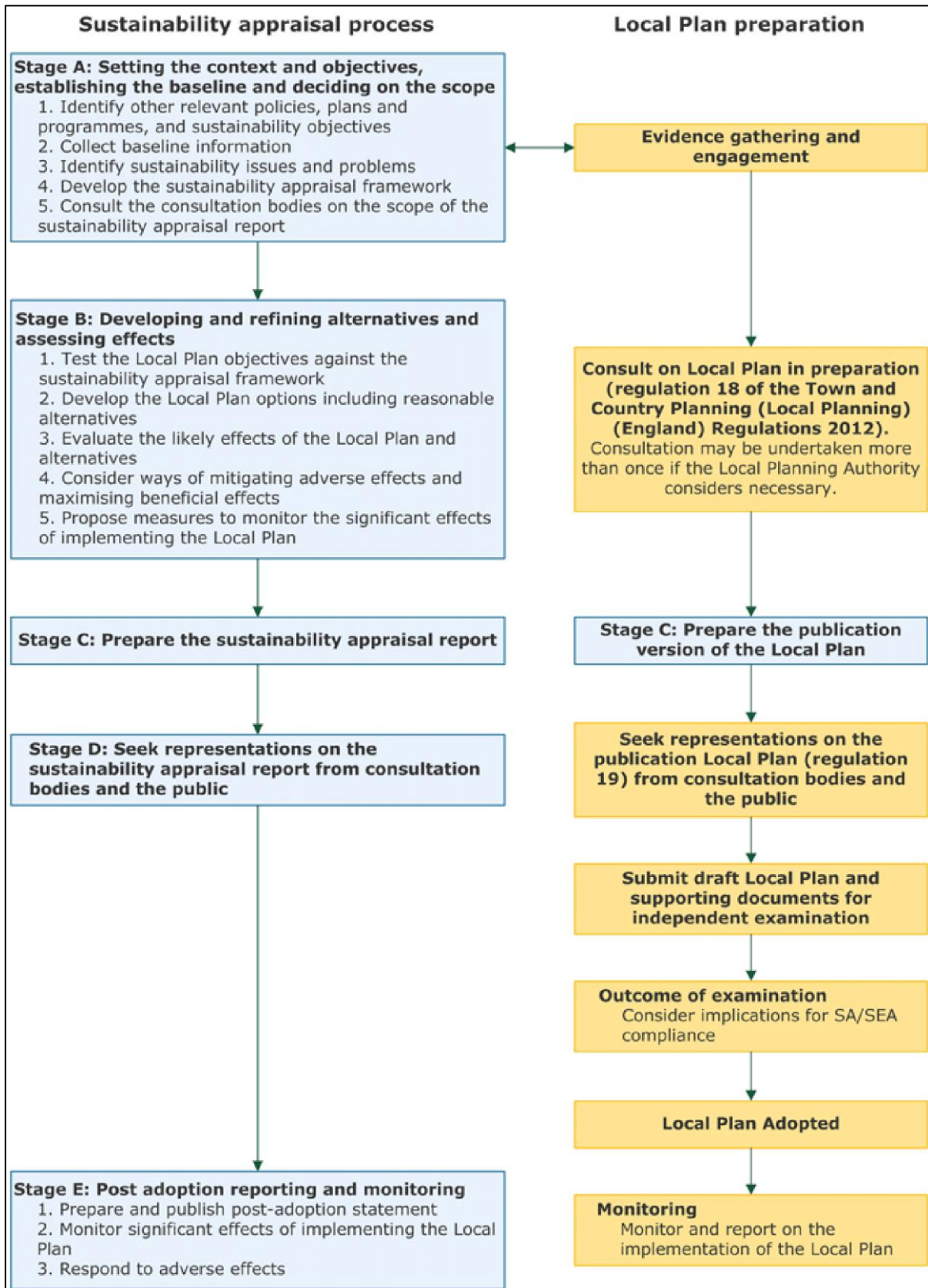


Figure 1 - The Sustainability Appraisal and the local plan process

- 2.6. This Scoping Report addresses Stage A – ‘the scoping stage’. The scoping stage is the first part of the SA process and identifies what should be covered and in how much detail. It establishes the context, objectives and approach of the appraisal and identifies relevant environmental, economic and social issues and objectives.
- 2.7. This document is not the Sustainability Appraisal Report. It forms the first stage in the preparation of the Sustainability Appraisal Report.
- 2.8. An overview of the steps involved in Stage A is shown in Figure 2. A detailed breakdown of each section of this report is listed later in this section in Table 1.

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

- Identify other relevant policies, plans and programmes, and sustainability objectives
- Collect baseline information
- Identify sustainability issues and problems
- Develop the sustainability appraisal framework
- Consult the consultation bodies on the scope of the sustainability appraisal report

Figure 2: What is addressed in Stage A – ‘the scoping stage’

- 2.9. The purpose of the SA is to promote sustainable development. The most commonly cited definition of sustainable development stems from the Brundtland Report of 1987 ‘Our Common Future’. It defines sustainable development as:

‘Meeting the needs of the present without compromising the ability of future generations to meet their own needs’¹

- 2.10. In the United Kingdom, the Government seek to achieve sustainable development in all planning policies and decisions. National Planning Policy sets out three overarching objectives which local plans and decision making need to pursue to achieve sustainable development:

*an economic objective –to help build a strong, responsive and competitive economy.
 a social objective –to support strong, vibrant and healthy communities.
 an environmental objective –to protect and enhance our natural, built and historic environment.*

- 2.11. It is a statutory requirement for each local planning authority to have an up-to-date local plan.
- 2.12. Following this introductory section, the Scoping Report is split into five sections. To fulfil the regulatory requirements of SA the five sections in this report mirror the five steps set out in national Planning Practice Guidance for ‘Stage A –the scoping stage’. The content and purpose of each section are set out in Table 1.

¹ Resolution 42/187 of the United Nations General Assembly

<p>Stage A1–Policies, plans and programmes, & sustainability objectives</p> <ul style="list-style-type: none"> • Stage A1 identifies and summarises the relevant policies, plans and programmes from relevant international, national, regional and local strategies and guidance. It also identifies the sustainability objectives which influence the review. • This establishes how the Local Plan is affected by external factors and helps to identify ideas for how constraints can be addressed, and to help to identify SA objectives. • A review of relevant policies, plans and programmes is contained in the Background Papers which will accompany the review plan when published for Regulation 18 consultation later in 2023. A list of the range of policies, plans and programmes reviewed is set out in Appendix 1: Policies, Plans and Programmes.
<p>Stage A2–Collecting Baseline Information (Borough Profile)</p> <ul style="list-style-type: none"> • Stage A2 sets out the latest information relating to the Borough that is used to identify issues and trends which may need addressing through the Local Plan. The baseline data includes social, economic and environmental information. Establishing a baseline helps to identify current issues and is useful in monitoring the ongoing effectiveness of the Local Plan. Local information and trends are compared with wider regional and national data where available. • The baseline information provides an evidence base for environmental problems, the prediction of effects, and future monitoring; it also helps in the development of SA objectives. • The baseline information will be updated throughout the plan period.
<p>Stage A3–Identifying sustainability issues and problems</p> <ul style="list-style-type: none"> • Stage A3 draws out the key issues and trends that can be seen in the baseline information and the review of relevant policies, plans and programmes. It also identifies key sustainability objectives and sustainability issues which the Local Plan should consider. • This helps to focus and streamline the SA, including the baseline information analysis, the setting of the SA objectives, and prediction of effects and monitoring.
<p>Stage A4–Developing the sustainability appraisal framework</p> <ul style="list-style-type: none"> • Stage A4 establishes the sustainability appraisal framework which consists of sustainability objectives that provide a basis for assessing whether the objectives, policies and proposals of the Local Plan are the most appropriate to achieve sustainable development. • SA objectives will test the environmental effects of the plan or compare the effects of alternatives. They provide a framework in which the social, environmental and economic effects of the plan can be tested and success of failure in meeting sustainability objectives can be measured.
<p>Stage A5–Consulting on this scoping report</p> <ul style="list-style-type: none"> • Sets out the consultation process for this scoping report. The section details the key bodies who are consulted and how they can view the document and offer their comments. • This helps to ensure the SA covers the likely significant environmental effects of the plan.

Table 1 – Structure of the Scoping Report

3. POLICIES, PLANS AND PROGRAMMES, & SUSTAINABILITY OBJECTIVES – STAGE A1

- 3.1. To meet the requirements of the SEA Directive and national policy and guidance it is necessary to take account of other relevant policies, plans, programmes (PPPs) and the sustainability objectives contained within them.
- 3.2. A review has been undertaken of an appropriate range of PPPs and their sustainability objectives which may inform and influence the review plan policies and allocations. Only pertinent PPPs appropriate to the content and level of detail in the new plan are included in the review. While many international and national policies have an indirect influence on the Local Plan, it is considered that these are translated into more immediate national and local documents. For this reason, high-level international policies, plans and programmes (such as those relating to internationally important habitats) are not individually considered.
- 3.3. A list of the range of policies, plans and programmes reviewed is set out in Appendix 1: Policies, Plans and Programmes.

4. COLLECTING BASELINE INFORMATION – STAGE A2

- 4.1. This section discusses ‘Stage A2’ and the baseline information applicable to Rugby Borough. This profile contains facts and figures which are used to identify the issues which the new plan needs to address.
- 4.2. This baseline information refers to the existing environmental, economic and social characteristics of the area which may be affected by the Local Plan and considers the likely evolution of the area without the implementation of a new Local Plan. Where appropriate, data is included showing historic and potential future trends. This information helps to measure the potential effects of the implementation of the new Local Plan and its policies and site allocations.
- 4.3. Schedule 2 of The Environmental Assessment of Plans and Programmes Regulations 2004 sets out the issues which must be covered in the baseline information. Where available the latest information about the Borough is presented.
- 4.4. Key issues arising from the information in the profile are summarised using social, economic and environmental indicators in the table at the beginning of each profile section. The information reflects the current situation concerning a particular issue and where information is available it also includes the historic trend. Where appropriate, national and regional targets have been included which have been set by the government and other relevant organisations such as the Environment Agency. Local targets have been included where these have been set

within existing council plans and strategies.

4.5. An appraisal of relevant key issues arising from the profile will be included in the Sustainability Appraisal. These appraisals will include:

- The social, environmental and economic consequences of particular indicators;
- whether any problems are permanent or temporary;
- whether it would be difficult to remedy these problems; and
- has there been, or will there be significant cumulative effects

CLIMATE CHANGE

4.6. The Government regularly publishes Local Authority and regional carbon dioxide emissions national statistics. Emissions for Rugby Borough have fallen between 2005-2019 from 23.7t per capita to 16.4t per capita. Per capita emissions in the plan area within the scope of influence of the local authorities fell most years between 2005 and 2019 as shown in Table 2.

Year	Total Emissions (kt CO ₂)	Per capita emissions (t)
2005	2,167.3	23.7
2006	2,225.5	23.9
2007	2,454.2	25.9
2008	2,219.1	23.0
2009	2,087.6	21.4
2010	2,100.5	21.2
2011	2,088.2	20.8
2012	1,931.1	19.1
2013	1,955.1	19.2
2014	1,979.3	19.2
2015	1,839.5	17.6
2016	1,956.0	18.6
2017	1,814.9	17.1
2018	1,862.2	17.4
2019	1,791.0	16.4

Table 2: Carbon dioxide emissions estimates in Rugby 2005-2019

4.7. Domestic and commercial between 2005 and 2019 saw the greatest drop in carbon dioxide emissions. Within Rugby Borough, industry remained the main contributor of the highest level of emissions mainly related to large industrial installations.

Emission Source (kt)	2005	2019
Industry	1,273.8 (59%)	1,093.9 (61%)
Commercial	130.3	83.6
Public Sector	39.0	19.1
Domestic	240.7 (11%)	157.4 (9%)
Transport	481.4 (22%)	442.9 (25%)
Total	2,167.3	1,791.0

Table 3: Changes in carbon dioxide emissions by sector for Rugby Borough between 2005 and 2019

POPULATION

- 4.8. The Office for National Statistics produced a snapshot of changes for each authority between the 2011 and 2021 Censuses. Between the last two censuses (held in 2011 and 2021), the population of Rugby increased by 14.3%, from around 100,100 in 2011 to around 114,400 in 2021. This means Rugby's population saw the largest percentage increase in the West Midlands. The population of the West Midlands increased by 6.2%, while the population of England rose by 6.6%.
- 4.9. In Rugby, the percentage who were employed rose from 61.0% in 2011 to 61.4% in 2021. During the same period, the regional percentage fell from 54.4% to 53.3%. The percentage of people aged 16 years and over who were unemployed (excluding full-time students) in Rugby fell from 3.2% to 2.1%, while the percentage of people aged 16 years and over who were retired (economically inactive) decreased from 22.6% to 21.9%.
- 4.10. In the latest census, around 90,100 Rugby residents said they were born in England. This represented 78.8% of the local population. The figure has risen from just under 84,500 in 2011, which at the time represented 84.4% of Rugby's population. Poland was the next most represented, with just over 3,800 Rugby residents reporting this country of birth (3.3%). This figure was up from just over 2,300 in 2011, which at the time represented 2.3% of the population of Rugby. The number of Rugby residents born in India rose from around 1,100 in 2011 (1.1% of the local population) to around 2,200 in 2021 (1.9%). Rugby saw the West Midlands' joint third-largest percentage-point rise (alongside [Coventry](#)) in the proportion of people who did not identify with any national identity associated with the UK (from 7.6% in 2011 to 11.8% in 2021). Every local authority area across the West Midlands saw a rise in the percentage of people who did not identify with any national identity associated with the UK, as the regional percentage grew from 6.2% to 8.7%.
- 4.11. In 2021, 7.6% of Rugby residents identified their ethnic group within the "Asian, Asian British or Asian Welsh" category, up from 5.2% in 2011. The 2.4 percentage-point change was the largest increase among high-level ethnic groups in this area. Across the West Midlands, the percentage of people from the "Asian, Asian British or Asian Welsh" ethnic group increased from 10.8% to 13.3%, while across England the percentage increased from 7.8% to 9.6%. In 2021, 85.7% of people in Rugby identified their ethnic group within the "White" category (compared with 90.5% in 2011), while 2.8% identified their ethnic group within the "Mixed or Multiple" category (compared with 2.0% the previous decade). The percentage of people who identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category increased from 2.0% in 2011 to 2.7% in 2021.
- 4.12. In 2021, 36.1% of Rugby residents reported having "No religion", up from 24.3% in 2011. The rise of 11.9 percentage points was the largest increase of all broad religious groups in Rugby. Because the census question about religious affiliation is voluntary and has varying response rates, caution is needed when comparing figures between different areas or between censuses. Across the West Midlands, the percentage of residents who described themselves as having "No religion" increased from 22.0% to 32.9%, while across England the percentage increased from 24.8% to 36.7%. In 2021, 50.5% of people in Rugby described themselves as Christian (down from 63.7%), while 5.9% did not state their religion (down from 6.8% the decade before).

4.13. In 2021, 6.2% of Rugby residents were identified as being disabled and limited a lot. This figure decreased from 7.5% in 2011. In 2021, around 1 in 10 people (10.0%) were identified as being disabled and limited a little, compared with 9.6% in 2011. The proportion of Rugby residents who were not disabled increased from 82.8% to 83.8%. The decrease in the proportion of residents who were identified as being disabled and limited a lot was greater across the West Midlands (1.9 percentage points, from 9.9% to 8.0%) than in Rugby (1.3 percentage points). Across England, the proportion fell by 1.6 percentage points, from 9.1% to 7.5%.

DEPRIVATION

4.14. In 2019, Rugby Borough ranked out 222 of 317 local authorities (1 being the most deprived). Rugby performs particularly well in relation to measures relating to IDAOP (Income Deprivation Affecting Older People Index), Employment and Education, Skills & Training. The Borough performs less favourably in relation to Crime (ranked 142 out of 317). It also performed lower than other ranks in relation to Living Environment which considers the quality of housing as well as air quality and road traffic accidents. The majority of the most deprived areas fall around the centre of Rugby town and to the north and west of Rugby Borough.

EDUCATION

4.15. There are 52 schools in Rugby Borough, including 33 primary schools, nine secondary schools, five independent schools and five special needs schools and children centres. The greatest concentration of schools is within Rugby town. Rugby Borough has a high percentage of highly qualified residents in comparison to a relatively low percentage of residents with no qualifications - this enables the Borough to support a range of professional and skilled occupations.

HEALTH

4.16. A general hospital (Hospital of St Cross) lies south the South of Rugby town providing a range of services. The health of the population of Rugby Borough is generally comparable to or better than the England average. However, road casualties are significantly higher.

OPEN SPACE, SPORT AND RECREATION

4.17. Rugby Borough Council is responsible for over 230 hectares of green space within the Borough. This includes a diverse portfolio including Caldecott Park, Diamond Jubilee Wood at Ashlawn Road and Wildlife areas at Newbold Quarry Park. An audit of open spaces within Rugby was carried out in 2008 as part of the evidence base for the Local Plan 2011-2031. For the urban area of Rugby, access to greenspaces is excellent, although there were a number of deficiencies highlighted in certain typologies including allotments and community gardens in the north and central part of the town. In the rural parts of the Borough it was concluded that accessibility is reasonable although local facilities such as play and allotments are in many areas sporadic and accessibility is an issue with some villages not having any provision. However, for the typologies covering natural/semi natural green space and sports pitches, where driving accessibility is more relevant, accessibility was very good with no deficiencies identified. Rugby Borough's first Green Space Strategy was published in 2014 setting out the policies for delivery and management of green space within the Borough over the next 10 years.

4.18. In 2015, an Open Space, Playing Pitch and Sports Facilities Study was carried out to ensure the delivery of a strategic network of open space, sports facilities and playing fields up to 2031. The study concluded that there is sufficient space for athletics, swimming pool space, tennis, rugby and general sports hall space. However, up to 2031 there will be a need for cricket grounds, a hockey pitch, football pitches, gymnastics space and squash courts. Over 60% of the supply of fitness stations and studio provision is provided by the commercial sector. The amount of allotment space in Rugby Borough is higher than in similar authorities. As of September 2015 there were 255 people on the Council's waiting list for an allotment.

CRIME

4.19. Rugby is the safest major town in Warwickshire. However, the overall crime rate in Rugby Borough in 2021 was 74 crimes per 1,000 people which compares poorly to Warwickshire's overall crime rate, coming in 14% higher than the Warwickshire rate of 63 per 1,000 residents. The most common crimes in Rugby Borough are violence and sexual offences, with 2,680 offences during 2021. This is 3.9% higher than 2020's figure of 2,576 offences.

TRANSPORT

4.20. Rugby Borough is positioned in a central part of England, within close proximity of key parts of the strategic road network. The principal roads that run through the Borough are the M6, A5, M45 and M69. The M1 and A1 are within close proximity of the eastern boundary of the Borough. Rugby is on the national rail network, providing access to London, the Midlands, the North West and Scotland, with connections to Coventry and Nuneaton in the west and Milton Keynes and Northampton in the east. A regular train service runs from Rugby town to Birmingham. The number of trips at Rugby Train station has increased by 39% over the last five years. A new strategic parkway station at Houlton, close to M1 Junction 18, east of Rugby with 260+ car parking spaces has been proposed with an estimated delivery timescale by 2028.

4.21. Approximately four miles from Rugby Town Centre is the Daventry International Rail Freight Terminal, one of the key rail freight interchanges in Europe. Birmingham Airport is approximately 27 miles east of the Borough.

BIODIVERSITY

4.22. Rugby Borough contains several national and local designated biodiversity and geodiversity sites. There are no sites of international importance within Rugby Borough. However, Rugby Borough contains many national and local designations as set out below:

- Seven Sites of Special Scientific Interest (SSSI)
- Four Local Nature Reserves
- Twelve Sites of Importance for Nature Conservation (SINCs)
- Two Regionally Important Geological Sites

4.23. All of the SSSIs are located to the west and south west of the Rugby Urban Area. Rugby Borough contains two geological SSSIs, Ryton and Brandon Gravel Pits and Wolston Gravel Pit. Rugby Borough contains all or parts of five biological SSSIs: Brandon Marsh, Coombe Pool, Ryton Wood, Draycote Meadows and Stockton Railway Cutting and Quarry. The four Local Nature Reserves within Rugby Boundary are Ashlawn Cutting, Newbold Quarry Park, Swift

Valley and Cock Robin Wood. Throughout Rugby Borough the 12 SINCs are Oxford Canal Meadows, Abbotts Farm, Lime Kilns, Osier Meadow, Cawston Spinney, Wolvey Rush Pasture, Manor Farm Meadows, Home Farm Grasslands, Sally's Hole, Brandon Little Wood and Burton Hill Meadows.

- 4.24. There are no SACs in Rugby Borough. Ensor's Pool, located in Nuneaton and Bedworth Borough and within 10km of the Rugby Borough boundary, has three statutory designations as a Special Area of Conservation (SAC), a Site of Special Scientific Interest (SSSI) and a Local Nature Reserve (LNR). Ensor's Pool is designated as part of the Natura 2000 network because of the presence of the white clawed-crayfish. Rugby Borough contains three broad habitats: woodland, grassland and marsh and open water. There is a large concentration of ancient woodland located to the west of Rugby Borough. The Oxford Canal in Rugby provides a valued semi-natural habitat for wildlife and its connectivity to the wider canal network and proximity to other areas of Green Infrastructure.

HISTORIC ENVIRONMENT

- 4.25. Within Rugby Borough there are 19 Conservation Areas which are located in a number of the villages throughout the Borough and within the urban area. A Conservation Area covers a larger part of Rugby town centre with an additional designation covering the Rugby School grounds and adjoining residential/commercial areas. Beyond the urban area there is a large Conservation Area covering Coombe Abbey Registered Park and Garden and Listed Buildings. The remaining conservation areas are found in the following villages throughout the Borough: Brandon, Brinklow, Churchover, Clifton upon Dunsmore, Dunchurch, Easenhall, Leamington Hastings, Monks Kirby, Stretton-on-Dunsmore, Thurlaston, Wolston.
- 4.26. There are six Grade I Listed Buildings, 30 Grade II* Listed Buildings and 460 Grade II Listed Buildings in the Borough. In addition, there are 26 Scheduled Monuments and five Registered Gardens at Bilton Grange (Grade II), Coombe Abbey (Grade II*), Ryton House (Grade II), Newnham Paddox (Grade II) and Dunchurch Lodge (Grade II). There are currently nine assets on the Heritage at Risk Register within the Borough. The majority of these assets consist of Scheduled Monuments with one building (Ryton House, Ryton-on-Dunsmore) which is in an unsatisfactory condition.

LANDSCAPE

- 4.27. The landscape of Rugby Borough is a gently undulating lowland of hills and vales traversed by the rivers of the Avon and Leam. A plateau rises to the north and ironstone fringe hills lie to the south east. Outside the urban area of Rugby town the area is a generally well-settled rural landscape with major roads running through it, with associated large-scale commercial development. The area includes three national character areas- the Leicester Vales to the north, Dunsmore and Feldon to the south and the Northamptonshire Uplands covering the eastern fringes. There are no nationally or locally designated landscapes within the Borough.
- 4.28. The most recent landscape character assessment for Rugby Borough was carried out in 2006. It found that the landscape in the north of Rugby is in particularly weak condition. To the south of the town the southern escarpment is of particular importance being highly sensitive and in strong condition. There are a number of sites of local significance around the urban fringe whose condition is in decline. These areas would benefit from further protection and

enhancement measures to ensure their long-term benefit to future generations. These include Hillmorton Locks, Newbold, Cosford, Newton and the River Avon corridor. There are large areas to the east of the town where the condition of the landscape is also in decline but which are in less sensitive locations. There is no landscape located within the urban fringe that is of low sensitivity.

- 4.29. National Character Area (NCA) profiles created by Natural England are used to define the specific combination of landscape, geodiversity, biodiversity, history, culture and economic activity in the area. NCAs follow natural lines in the landscape instead of administrative boundaries. Rugby Borough lies within three National Character Areas. The parishes of Binley Woods; Brinklow; Long Lawford; Ryton-On-Dunsmore, Stretton-On- Dunsmore; and Wolston lie within National Character Area 96: Dunsmore and Feldon. Wolvey lies within National Character Area 94: Leicestershire Vales.
- 4.30. Small areas to the east within Rugby Borough lie within National Character Area 95: Northamptonshire Uplands. Much of the west of the Borough, around Coventry, is Green Belt. These National Character Areas are summarised below:
- 94 Leicestershire Vales - Leicestershire Vales National Character Area (NCA) shares many characteristics with the neighbouring Northamptonshire Vales NCA. The Leicestershire Vales extend between the town of Hinckley in the west to Leicester in the northeast and southwards towards Market Harborough and Lutterworth. This is a large, relatively open, uniform landscape composed of low-lying clay vales interrupted by a range of varied river valleys. Its sense of place comes less from its overall landform and more from its visually dominant settlements and views towards surrounding higher ground. The city of Leicester dominates the north-eastern corner of the NCA. Other large- to medium sized settlements include the towns of Market Harborough, Lutterworth and Hinckley, with many attractive small towns, villages and buildings and features of historic interest in between. The north of the area has a predominance of settlements and a general lack of tranquillity; this contrasts strongly with the distinctly more rural feel in the southern part of the area, where a mixture of arable and pastoral farmland is found.
 - 95 Northamptonshire Uplands - The Northamptonshire Uplands National Character Area (NCA) is an area of gently rolling, limestone hills and valleys capped by ironstone-bearing sandstone and clay Lias, with many long, low ridgelines. Rivers flow out from the NCA in all directions, including several major rivers – the Cherwell, Avon, Welland, Tove, Ouse, Nene and Ise. While there are areas of differing character, there are strong unifying landscape features across the Northamptonshire Uplands, most importantly the extensive areas of open field systems with ridge and furrow and the earthworks of deserted and shrunken settlements which occur throughout. Other features include the strong, mostly Parliamentary enclosure pattern with high, wide, A-shaped hedgerows bounding the largely rectilinear fields with their frequent mature ash and oak trees; the many country houses and their associated extensive areas of historic and nationally important designed parkland landscapes; the distinctive ironstone, cob and brick nucleated settlements with their large stone churches, often with prominent steeples; the narrow lanes with very wide grassy verges; and the small, scattered but prominent broadleaved woods and coverts. There are also wide, long-distance views from the edges and across the ridgetops throughout the area.
 - 96 Dunsmore and Feldon - Dunsmore and Feldon is predominantly a rural, agricultural

landscape, crossed by numerous small rivers and tributaries and varying between a more open character in the Feldon area and a wooded character in Dunsmore. The name Feldon refers to the old English term *feld* meaning ‘open cleared land’ and expresses the contrast, in medieval times, with the more wooded Arden area to the north-west. The area is mainly within Warwickshire, with the southern boundary delineated by the steep limestone escarpment of the Cotswolds, and the northern boundary by the Leicestershire Vales. To the west lie the well-wooded pastures of Arden, together with the Severn and Avon Vales, while the undulating pastures and low hills of the Northamptonshire Uplands form the eastern border. It is an important food producing area and the agricultural expanse of large arable fields, improved pasture and small villages forms a transitional landscape between the surrounding National Character Areas (NCAs). The land to the north comprises the wedge-shaped area of low ridges and valleys lying between Leamington Spa, Coventry and Rugby, and is known as Dunsmore. This still retains a character of historic heathland and woodlands such as the Princethorpe Woodlands which are the most important cluster of ancient woodlands in Warwickshire and an outstanding example of a large area of semi-natural habitat. The woods sometimes create a sense of confinement in the generally open landscape. The fringes of the plateaux are all similar in character but have open views framed by low hills and settlements.

AIR QUALITY

- 4.31. Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children, the elderly, and those with existing heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often less affluent areas.
- 4.32. Rugby Borough Council produces an annual report outlining the air quality monitoring which has taken place and potential impacts to air quality not currently being monitored. The monitoring of air quality focuses on nitrogen dioxide, particulate matter (dust) and sulphur dioxide. The main pollutants within Rugby Borough are from road traffic in particular the M6, M69 and M45. Monitoring data for 2020 showed a continuation of an overall decreasing trend in annual mean NO₂ concentrations since 2016.
- 4.33. There is an obligation on all local authorities under Part IV of the 1995 Environment Act to review regularly and assess air quality in their areas and to determine whether or not national air quality objectives are likely to be achieved. Where exceedances are considered likely, the local authority must declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in pursuit of required air quality improvements.
- 4.34. Rugby Borough Council declared an Air Quality Management Area (AQMA) in 2004 for exceedances of the annual mean NO₂ objective. This area covers the whole urban area of Rugby bounded by the southern boundary with West Northamptonshire Council, the A5, M6, minor roads to the west of Long Lawford, A45 and M45. Between 2011 and 2015, Rugby was below the national average for the Public Health Framework Indicator, ‘Fraction of mortality attributable to particulate air pollution’.

WASTE

- 4.35. Warwickshire County Council has adopted the Warwickshire Waste Core Strategy Local Plan 2013-2028 which sets out the spatial strategy, vision, objectives and policies for managing waste for a 15-year plan period up to 2028. It also provides the framework for waste development management including implementation and monitoring. There are currently five active landfills in the county receiving the complete range of waste including stabilised non-reactive hazardous waste cells at two landfills. New waste facilities will be developed on industrial estates, brownfield industrial land and existing waste management facilities.
- 4.36. Between 2019-2020, a total of 44,246 tonnes of waste was collected within Rugby Borough, of which 39,750 tonnes was household waste. This compares with 47,146 tonnes and 43,680 tonnes respectively in 2014-2015. In 2019-2020, 17,989 tonnes of household waste were sent for recycling/composting/re-use, equating to 45% of waste collected. This figure is slightly higher than the overall recycling rate for England of 43.2% of all waste. Between 2014-2015 within Rugby Borough, 46% of household waste was recycled/composted/re-used.

SOIL

- 4.37. The Agricultural Land Classification (ALC) system provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations to agricultural use. The principal factors influencing agricultural production are soil wetness, drought and erosion. These factors, together with interactions between them, form the basis for classifying land use into one of five grades, where 1 describes land as excellent (land of high agricultural quality and potential) and 5 describes land as very poor (land of low agricultural quality and potential). Land falling outside these scores is deemed to be 'primarily in non-agricultural use', or 'predominantly in urban use'. Grade 3 can be further separated into grades 3a and 3b, although this requires further local surveys and therefore such data is only available for small areas. Grades 1, 2 and 3a are considered to be best and most versatile agricultural land. According to Natural England's Agricultural Land Classification, land within Rugby Borough mainly comprises Grade 3 agricultural land, although there are small areas of Grade 2 land in the north and west of the Borough as well as to the south of Rugby town.

GEOLOGY AND MINERALS

- 4.38. The geology of Rugby Borough consists predominantly of sedimentary rocks and is represented by three major geological periods from the older Permian rocks through the Triassic to the younger Jurassic period. The Permian rocks make up less than 0.5% of the geology consisting of some Sherwood Sandstones. The Borough is dominated by Triassic limestone rocks, which make up approximately 60% of the geology. Limestones are impervious and do not allow water to percolate so readily but tend to be indicative of well-drained land due to their common well-jointed characteristics. The remaining 40% of the geology in the Borough is represented by Jurassic argillaceous rocks; clay rich rocks where soils are not so well drained.
- 4.39. There are two sites designated as Local Geological Sites (formerly Regionally Important Geological Sites, RIGS) in the Borough (Parkfield Road Quarry, and Royal Oak Gravel Pit & Cutting). Parkfield Road Quarry was designated as it is a good example of Rugby Limestone, while Royal Oak
- 4.40. Gravel Pit and Cutting is a good example of the Hillmorton Member of the Middle Pleistocene

Wolston Formation.

CONTAMINATED LAND

4.41. Land can be contaminated by a variety of sources, such as waste disposal, industry or naturally occurring substances. For land to be classed as contaminated, it must pose a significant risk to either humans, wildlife or water resources. Rugby Borough published its Contaminated Land Strategy in 2001. The Contaminated Land Strategy sets out the steps taken to identify, inspect and remediate contaminated land. By law, a local authority must keep a public register of contaminated land. There are currently no entries on the Rugby Borough register of contaminated land.

WATER

4.42. The major river running through Rugby Borough is the River Avon which flows through Rugby town and eventually meets the River Severn. The other main rivers in Rugby Borough are the River Swift, River Anker, Clifton Brook, Withy Brook, River Leam, Millholme Brook, Birdingbury Brook, River Itchin and Sow Brook.

4.43. The EU Water Framework Directive (2000/60/EC) looks at the ecological and chemical health of both groundwater and surface water with the aim of achieving 'moderate or good ecological status' and 'good chemical status' by 2027, and to ensure that there is no deterioration from existing statuses. The House of Commons published a water quality in rivers report in 2022. Only 14% of rivers in England can currently claim to have good ecological status. The Government is not on track to meet the Water Framework Directive requirement for all rivers to reach good status by 2027.

4.44. The Environment Agency collects data in relation to the Avon Warwickshire Management Catchment. The latest published data was 2019. Within this catchment there are three operational catchments, all of which fall within Rugby Borough: Avon Rural Rivers and Lakes; Avon – Midlands West and Avon Urban Rivers and Lakes. Across the Avon Warwickshire Management Catchment there are 78 water bodies mainly consisting of river, canals and surface water transfers and lakes. All of the 78 waterbodies failed the chemical status. In relation to ecological status, one waterbody was rated as good; 54 waterbodies were rated as moderate; 22 were rated as poor and one was rated as bad.

FLOOD RISK

4.45. Flood risk in the Borough is implicitly linked to climate change considering the changes predicted in weather patterns and the impact this will have on river levels and the ability for safe infiltration of surface water. The most substantial areas of flood risk lie along the main water bodies of Rugby Borough particularly the River Avon which flows through Rugby town. The floodplains along the River Avon and its tributaries largely fall within Flood Zone 3 with small areas within Flood Zone 2. There are multiple water storage areas along the River Avon within and on the edges of Rugby town. A large area on either side of the southern end of the A5 which cover mainly undeveloped land lies within Flood Zone 3. The risk of flooding in the Borough has been determined through the production of a Strategic Flood Risk Assessment (SFRA), which identifies the Main Rivers, ordinary watercourses and flood zones, including the functional floodplains and provides an assessment of the implications of climate change on flood risk.

5. IDENTIFYING SUSTAINABILITY ISSUES AND PROBLEMS – STAGE A3

- 5.1. An analysis of the review of relevant policies, plan, programmes and sustainability objectives and the baseline data in the profile has highlighted the economic, environmental and social issues that need to be considered in the Local Plan and SA appraisal.
- 5.2. The key sustainability issues that need to be addressed by the Local Plan are shown in Table 2. These key issues are drawn together and summarised thematically. The issues identified are taken forward and developed into similar themes in the SA framework with individual sustainability objectives seeking to address the identified issues.
- 5.3. A key sustainability issue has been identified where:
- An issue is considered to be of significance in international and/or national policy and can be influenced by local planning policy; and/or
 - a relevant indicator/measurement is approaching or has breached a recognised target in Rugby Borough; and/or
 - the Borough performs significantly worse in comparison with national averages, county averages or other appropriate geographies; and/or
 - there is a common consensus among local stakeholders that the matter is a critical sustainability issue for the Borough.
- 5.4. It is recognised that the sustainability issues facing the Borough will change over time and need to be continually reviewed using the most up to date information and to reflect identified priorities. Table 2 sets out the key sustainability issues for the Borough; fourteen have been identified.
- 5.5. The Council is aware that the Covid-19 pandemic/Brexit will continue to impact on economic, social and environmental objectives over the medium and long-term future. These impacts will not yet be fully understood. Consequently, it is recognised that the key sustainability issues set out in Table 2 may need further review as the new plan is progressed. However, it is considered that Table 2 identifies the key issues facing the Borough.

ISSUE 1: MITIGATING AND ADAPTING TO CLIMATE CHANGE

The Local Plan needs to:

- deal with the consequences of climate change in a proactive way by taking into account the long-term implications for flood risk, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures; and
- include measures which support the transition to net zero carbon by 2050 thereby reducing greenhouse gas emissions.

ISSUE 2: USING RESOURCES SUSTAINABLY

The Local Plan needs to:

- ensure development minimises the use of resources including water, energy and materials and that these are from sustainable sources;
- ensure development minimises waste;

- help reduce air pollution including traffic-borne pollution on the network and the impact on residents of the borough;
- facilitate the development of renewable energy sources; and
- develop brownfield sites within urban areas and thereby help regenerate the Borough and reduce the pressure on greenfield sites in the sub-region.

ISSUE 3: REGENERATING THE LOCAL ECONOMY AND IMPROVING LOCAL EMPLOYMENT AND SKILL OPPORTUNITIES

The Local Plan needs to:

- enable the development of brownfield sites for employment purposes to compensate for job losses on these sites;
- assist in regenerating the local economy to provide a significant number of local jobs to help alleviate deprivation and social exclusion, and reduce out-commuting;
- ensure there is sufficient employment land available to meet the needs of a range of modern businesses including those of existing clusters (advanced manufacturing) as well as emerging sectors (environmental technology);
- facilitate diversification of the economy;
- consider ways in which the local skill levels can be enhanced;
- facilitate the refurbishment of existing sites;
- continue to develop the tourism and leisure sector to help diversify the rural economy; and
- ensure a green recovery following the significant economic implications of the Covid-19 pandemic/Brexit to meet net-zero carbon requirements.

ISSUE 4: IMPROVING ACCESSIBILITY AND REDUCING CAR USAGE

The Local Plan needs to:

- ensure that employment, services and facilities are conveniently accessible to residents;
- encourage less car-use and more travel by other more sustainable modes;
- ensure public transport links are significantly improved to services and employment areas within the borough and the wider sub-region; and
- ensure cycling and pedestrian networks are safe and convenient.

ISSUE 5: IMPROVING HEALTH AND WELL-BEING

The Local Plan needs to:

- ensure that existing health facilities are safeguarded and land is available for new facilities in accessible locations;
- recognise that there will be long-term health and social care implications arising from the Covid-19 pandemic;
- ensure open spaces including natural green spaces are accessible to residents to allow opportunities for passive and active recreation to assist with an individual's physical and mental well-being; and
- ensure places are safe and accessible so that crime and disorder do not undermine people's quality of life or community cohesion.

ISSUE 6: MEETING HOUSING NEEDS

The Local Plan needs to:

- meet the requirements of the Borough's ageing population and ensure the increasing number of households are accommodated;
- ensure sufficient affordable housing is provided to meet local needs;
- ensure there are an appropriate range and mix of dwellings to meet local needs at each stage of life;
- ensure new housing contributes towards the regeneration of the Borough;
- ensure housing at an appropriate density is located on sites which are accessible to public transport and local services; and
- enable ageing stock to be refurbished or redeveloped to meet modern housing standards.

ISSUE 7: MAINTAINING A VIBRANT TOWN CENTRE

The Local Plan needs to:

- ensure the continued viability and vitality of Rugby town centre, which is considered vulnerable from competition; and
- ensure the town centre has a more diverse range of uses, recognising the significant shift in retail spending patterns that continue to occur, and has been accelerated by the effects of the Covid-19 pandemic; and
- ensure that all the centres have a range of facilities and services appropriate to their size to serve the local neighbourhood.

ISSUE 8: PROVIDING INFRASTRUCTURE AND SERVICES

The Local Plan needs to:

- consider ways in which existing infrastructure deficiencies can be addressed; and
- ensure the provision of the appropriate level of infrastructure and services to meet the needs generated by new development.

ISSUE 9: IMPROVING LEISURE AND CULTURAL FACILITIES

The Local Plan needs to:

- enable the provision of improved leisure and cultural facilities to improve the quality of life for residents and visitors.

ISSUE 10: CREATING A LOCAL AND SUB-REGIONAL GREEN INFRASTRUCTURE NETWORK

The Local Plan needs to:

- protect and enhance its existing green infrastructure network;
- identify new green infrastructure opportunities within the Borough and linkages to neighbouring areas within the sub-region;
- protect and enhance the Borough's recreational assets to reduce pressure on protected habitats in the sub-region and reduce the need to travel to other recreational areas outside of the Borough; and
- facilitate improvements to open space facilities to meet identified deficiencies in terms of quality, quantity and accessibility (sports pitches, allotments, cemetery, play areas).

ISSUE 11: PROTECTING AND IMPROVING THE NATURAL ENVIRONMENT

The Local Plan needs to:

- ensure all new development results in a biodiversity net gain and resist the loss of habitats which support a range of species; and
- protect and enhance the Borough’s nationally and locally important habitats and species which face pressure from direct and indirect habitat loss, deteriorating air and water quality, climate change and recreational disturbance.

ISSUE 12: MAINTAINING AND IMPROVING THE QUALITY OF THE BUILT ENVIRONMENT

The Local Plan needs to:

- preserve and enhance the Borough’s rich historic environment and character which contributes to the local distinctiveness of the Borough;
- ensure new development is designed to a high quality; and
- ensure areas are safe and attractive places to live, work and visit, including designs which can reduce crime, disorder and the fear of crime.

ISSUE 13: PRESERVING AND ENHANCING THE HISTORIC ENVIRONMENT

The Local Plan needs to:

- meet the Borough’s development needs without harming the historic environment;
- ensure all development maximises opportunities to ameliorate the condition of heritage at risk; and
- ensure opportunities to improve areas where past development or current activity negatively affects the quality of the historic environment or how its experienced are realised.

ISSUE 14: DEALING WITH THE CONSEQUENCES OF AN AGEING POPULATION

The Local Plan needs to:

- ensure there are appropriate and sufficient housing and care facilities for older people; and
- ensure there are sufficient transport, health and leisure facilities for older residents.

Table 2: The Key Sustainability Issues

6. DEVELOPING THE SUSTAINABILITY APPRAISAL FRAMEWORK – STAGE A4

- 6.1. The development of a SA framework is a recognised method used to describe, analyse and compare the likely environmental and sustainability effects of a local plan. The SA framework is made up of SA objectives and decision-making criteria. Figure 3 shows the structure of the SA framework and how the SA objectives and decision-making criteria relate to each other.
- 6.2. The review plan will be assessed by testing the plans objectives, policies and proposals against the SA framework. The appraisal will help to determine whether the objectives, policies and proposals in the Local Plan are appropriate in helping to achieve relevant environmental, economic and social objectives. It will also test the social, environmental and economic effects of the plan and compare the effects of alternatives while measuring success or failure in meeting the SA objectives.

Sustainability Appraisal Framework	→	This term is given to the overall framework.
Sustainability Theme	→	The sustainability theme groups the SA objectives. These sustainability themes come from the review of the policies, plans and programmes and the issues emerging from the baseline data.
SA Objective	→	The SA Objectives are specific measures which can be used to appraise the effects of the Local Plan and effects of alternative options. They allow the success or failure of the plan in meeting the objectives to be tested.
Decision Making Criteria	→	The Decision Making Criteria focus the appraisal by breaking down the SA objective into quantifiable issues.

- 6.3. The SA objectives are grouped by themes and mirror many national and international sustainability objectives, they have been adapted to suit the Borough’s local circumstances. While the SA objectives are distinct from the Local Plan objectives, in many cases they overlap. The SA objectives have been derived from the findings of the review of relevant policies, plans and programmes, the evidence set out above and the identification of sustainability issues.
- 6.4. Given the broad nature of sustainability objectives, to assist in assessing whether the objectives, policies and proposals of the Local Plan are the most appropriate in sustainability terms and the degree to which they meet the sustainability objectives, the Council will use decision-making criteria.
- 6.5. Each SA objective has a different number of decision-making criteria depending on the key issues which have arisen from the policies, plans and programmes review and the collection and analysis of baseline data. Table 3 (overleaf) shows the proposed SA framework and its SA

objectives and decision-making criteria, which are grouped by sustainability themes.

- 6.6. The framework covers a broad range of sustainability issues including economic, social and environmental factors. Using the findings of the review of relevant existing policies, plans and programmes and the most recent baseline information in the Borough Profile, the objectives and framework have been revised, building upon those used in the adopted Local Plan (Rugby Borough Local Plan 2011-2031).
- 6.7. The appraisal of each Local Plan policy/site option will be presented in SA matrices. The matrices will include a coded symbol showing the score for the policy/site option against each of the SA objectives along with a concise justification for the given score. The SA matrices for each policy/site option will be summarised in the body text of the SA report and presented in full in an addendum to the report.
- 6.8. The use of symbol coding in the matrices allows for likely significant effects (both positive and negative) to be readily identified. Figure 4 presents the key showing the symbols that will be used in the matrix.

The effects over time	
Key	++ major positive + positive o neutral – negative – – major negative ? uncertain

Figure 4: SA matrix key

Sustainability Theme	SA Objective	Decision-making Criteria	Baseline Indicator
Climate Change	SA1 – To address climate change issues through reducing greenhouse gas emissions.	1. Will it help to reduce carbon dioxide and other greenhouse gas emissions? 2. Will it support the transition to net zero carbon by 2050? 3. Will it deliver energy efficient buildings? 4. Will it support the charging of plug-in and other ultra-low emission vehicles?	<ul style="list-style-type: none"> Per capita CO2 emissions Percentage of new build homes built to 'zero-carbon ready' or Passivhaus standard or equivalent
Transport and Accessibility	SA2 - To reduce the need to travel and to reduce the effects of traffic on local communities.	1. Will it reduce traffic volumes and congestion? 2. Will it reduce road traffic accidents?	<ul style="list-style-type: none"> Commuting flows Killed and seriously injured (KSI) casualties on roads

Sustainability Theme	SA Objective	Decision-making Criteria	Baseline Indicator
	SA3 - To facilitate modal transfer away from use of the private car to other forms of travel including walking, cycling and public transport.	3. Will there be an increase in traffic related air pollution? 4. Will it increase the proportion of journeys using modes other than the private car? 5. Will it provide for high quality walking and cycling networks and supporting facilities such as cycle parking?	(per 100,000 population) <ul style="list-style-type: none"> • Air quality statistics • Main mode of travel to work • Access to good quality cycle parking
Community Activity	SA4 – To provide opportunities for community interaction	1. Will it provide opportunities for community engagement?	<ul style="list-style-type: none"> • Number of community facilities available
Crime and Disorder	SA5 – To reduce crime and disorder	1. Will it reduce crime levels?	<ul style="list-style-type: none"> • Local crime statistics
Poverty and Deprivation	SA6 - To reduce poverty and social exclusion	1. Will it reduce poverty and social exclusion in those areas most affected?	<ul style="list-style-type: none"> • Indices of Deprivation and Index of Multiple Deprivation
Health and Well-being	SA7 - To improve the health and wellbeing of the population	1. Will it reduce health inequalities in those areas most affected?	<ul style="list-style-type: none"> • Indices of Deprivation: Health deprivation and disability deprivation
Housing	SA8 - To ensure that everyone has the opportunity to live in a decent and affordable home.	1. Will it reduce homelessness? 2. Will it increase the range and affordability of housing for different groups in the community? 3. Will it increase the number of decent homes?	<ul style="list-style-type: none"> • Households on the Housing Register • Affordable housing completion figures • Decent Homes Standard
Employment	SA9 - To provide opportunities for residents to work locally rather than out-commute and thereby provide greater potential for people to	1. Will it improve accessibility to work by public transport, walking and cycling? 2. Will it provide job opportunities for	<ul style="list-style-type: none"> • Proposed development/improvements of key infrastructure/services • Unemployment figures

Sustainability Theme	SA Objective	Decision-making Criteria	Baseline Indicator
	<p>use public transport, cycle or walk to work.</p> <p>SA10 – To ensure high and stable levels of employment so all can benefit from economic growth in the borough</p>	those most in need of employment?	<ul style="list-style-type: none"> • Proportion of lone parents, long-term ill and disabled people who are economically active
Economy	SA11 - To increase investment in Rugby's economy to facilitate the sustainable regeneration of the Borough.	1. Will it make land and property available for business development?	<ul style="list-style-type: none"> • Proposed development of key sites • Employment land availability
Town Centre	SA12 - To ensure the vitality and viability of Rugby town centre.	1. Will it improve the vitality and viability of the centre.	<ul style="list-style-type: none"> • Amount and location of new floor space for different types of town centre uses • Vacancy rates
Leisure	<p>SA13 - To improve the quality and accessibility of leisure opportunities within the Borough.</p> <p>SA14 - To ensure that the Borough protects and enhances the quality of its public areas and green spaces.</p>	<p>1. Will it improve the range of sporting facilities in the Borough?</p> <p>2. Will it protect or enhance the Borough's network of greenspace?</p>	<ul style="list-style-type: none"> • Amount and location of existing and new facilities • Location of different types of existing and new open space
Biodiversity	SA15 - To conserve and enhance the Borough's biodiversity assets.	<p>1. Will it result in a biodiversity net gain?</p> <p>2. Will it enhance biodiversity through the restoration and creation of well-connected multifunctional green infrastructure?</p>	<ul style="list-style-type: none"> • Biodiversity net gain secured • Length of greenways permitted • Number of planning approvals that generated any adverse impacts on sites of

Sustainability Theme	SA Objective	Decision-making Criteria	Baseline Indicator
		<p>3. Will it maintain and enhance sites designated for their nature conservation interest?</p> <p>4. Will it conserve and enhance local habitats and species diversity, and avoid harm to protected species?</p>	<p>acknowledged biodiversity importance</p> <ul style="list-style-type: none"> • Number of characteristic rare species and priority habitats
Heritage & Design	<p>SA16 - To protect and enhance the historic environment.</p> <p>SA17 - To ensure that there is a high quality townscape incorporating good design principles for buildings and surrounding spaces.</p>	<p>1. Will it protect and enhance the historic environment?</p> <p>2. Will it improve the condition of any heritage asset identified as at risk?</p> <p>3. Will the design enhance the quality of the townscape?</p>	<ul style="list-style-type: none"> • Number of planning approvals that enhance listed buildings and conservation areas • Change in the number and % of Listed Buildings on the Heritage at Risk Register • Number of approvals complying with local design guide.
Air Quality	SA18 - To reduce air pollution and ensure air quality continues to improve.	1. Will it improve air quality?	<ul style="list-style-type: none"> • Measurement of nitrogen dioxide and particulate matter
Use of energy	SA19 - To increase energy efficiency and the proportion of energy generated from renewable sources in the Borough.	1. Will it reduce emissions of greenhouse gases by reducing energy consumption?	<ul style="list-style-type: none"> • Percentage of new build homes built to 'zero-carbon ready' or Passivhaus standard or equivalent • Percentage of new commercial development achieving BREEAM excellent standard
Use of land	SA20 - To improve efficiency in land use through the re-use of previously developed land and existing buildings.	1. Will it re-use previously developed land?	<ul style="list-style-type: none"> • Percentage of new homes built on previously developed land • Percentage of employment uses

Sustainability Theme	SA Objective	Decision-making Criteria	Baseline Indicator
			on previously developed land
Water Management	SA21 - To maintain and improve the water quality of the Borough. SA22 - To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.	1. Will it improve compliance with the Water Framework Directive? 2. Will it minimise the risk of flooding from all sources to people and property? 3. Will development be avoided in flood risk areas? 4. Will it reduce water consumption per head?	<ul style="list-style-type: none"> Waterbodies meet “good” status or above under WFD Properties at risk from flooding Approvals in areas at risk of flooding Number of approvals with a water limiting condition
Natural Resources	SA23 - To achieve the sustainable consumption of natural resources and management of waste.	1. Will it lead to reduced consumption of materials and resources?	<ul style="list-style-type: none"> % of household waste sent for reuse, recycling or composting

Table 3: SA Framework for the review of the Rugby Borough Local Plan 2021-2041 (with indicators)

7. CONSULTING ON THIS SCOPING REPORT – STAGE A5

- 7.1. The production of this formal Scoping Report is not required by law, but it is a useful way of presenting the information from the scoping stage of the SA process to the public and other organisations.
- 7.2. This Scoping Report was published for consultation and sent to the ‘consultation bodies’ (Historic England, the Environment Agency and Natural England) as required by Regulation 12 (5) of the UK SEA Regulations 2004. The Borough Council welcomes any comments on the report and the proposed sustainability appraisal framework to ensure all relevant sustainability issues are considered in the SA of the new Rugby Borough Local Plan.
- 7.3. The consultation period will run for five weeks from **Thursday 13 July to 5pm on Thursday 7 September**. Responses received will be reflected in the final SA Scoping Report.
- 7.4. Following the five-week consultation period, all responses will be considered and appropriate changes made to the sustainability appraisal framework. The latest sustainability appraisal framework will be taken forward to inform the Sustainability Appraisal of the Local Plan.
- 7.5. The draft Local Plan will be appraised, and a Sustainability Appraisal report will be produced. This will accompany the new Rugby Borough Local Plan for public consultation in accordance with the provisions of the Council’s Statement of Community Involvement (SCI) available online https://www.rugby.gov.uk/directory_record/941/statement_of_community_involvement. The SA report will present information on the effects of the plan and will clearly show how the SEA directive’s requirements have been met. A non-technical summary will provide an overview of the SA process and the findings and will be published alongside the SA report.
- 7.6. Comments received on the draft Local Plan during the public consultation will be considered and any resulting changes appraised in a revised SA report. When the new Rugby Borough Local Plan is finalised and approved by the Borough Council, it will be submitted to the Secretary of State for independent examination accompanied by the SA Report and the consultation statement.
- 7.7. Following the examination and successful adoption of the Local Plan, its significant effects will be monitored using the proposed method of monitoring which will be included in the SA Report. Continual monitoring will highlight specific issues and significant effects and lead to more informed decision-making. Monitoring will also form a useful source of baseline information for future updates to the Council’s planning policy documents.

APPENDIX 1 – POLICIES, PLANS AND PROGRAMMES

The following section sets out a list of key policies, plans and programmes (PPPs) which influence the preparation of the new Rugby Borough Local Plan and Sustainability Appraisal. The key aims, objectives and requirements of the PPPs and the key implications for the new Local Plan will be analysed in detail in the Background Papers for the Local Plan. At the end of January 2020 the UK left the EU although a transition period was in place until 31st December 2020. As set out in the Explanatory Memorandum accompanying the Brexit amendments, the purpose of the Brexit amendments to the SEA Regulations was to ensure that the law functions correctly after the UK has left the EU. No substantive changes were made by this instrument to the way the SEA regime operates. Relevant international plans and policy (including those at the EU level) were transposed into national plans, policy and legislation and these are considered below.

The European Union (Withdrawal) Act 2018 created the concept of ‘retained EU law’. At the time of writing the Retained EU Law (Revocation and Reform) Bill is in the House of Lords. This proposes to revoke retained EU law at the end of 2023. This would revoke the EU directives listed below at the end of 2023. This bill would also revoke the Environmental Assessment of Plans and Programmes Regulations 2004, which gives effect to the Strategic Environmental Assessment Directive.

INTERNATIONAL PLANS AND PROGRAMMES OF MOST RELEVANCE FOR THE LOCAL PLAN REVIEW

A.1 The Glasgow Climate Pact 2021 was adopted at the COP26 UN climate conference in November 2021. The Pact sees signatory countries increase climate ambition and action from the Paris Agreement in 2015 and sets out new rules to reduce greenhouse gas emissions including phasing down coal and a global carbon market. The Glasgow Climate Pact is the first global agreement to explicitly include parties pledging to reduce the use of fossil fuels.

A.2 The 2030 Agenda for Sustainable Development (2015): This initiative, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 1: No Poverty
- SDG 2: Zero Hunger
- SDG 3: Good Health and Well-being
- SDG 4: Quality Education
- SDG 5: Gender Equality
- SDG 10: Reduced Inequalities
- SDG 11: Sustainable Cities and Communities

A.3 United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the ‘Aarhus Convention’) (1998) - Establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

A.4 United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002) - Sets broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

A.5 European Environmental Noise Directive (2002) - Sets out a hierarchy for the avoidance, prevention and reduction in adverse effects associated with environmental noise, including noise generated by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery.

A.6 European Nitrates Directive (1991) - Identifies nitrate vulnerability zones and puts in place measures to reduce water pollution caused by the introduction of nitrates.

A.7 European Urban Waste Water Directive (1991) - Protects the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors.

A.8 European Air Quality Framework Directive (1996) and Air Quality Directive (2008) - Put in place measures for the avoidance, prevention, and reduction in harmful effects to human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution.

A.9 European Drinking Water Directive (1998) - Protects human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.

A.10 European Landfill Directive (1999) - Prevents and reduces the negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.

A.11 European Water Framework Directive (2000) - Protects inland surface waters, transitional waters, coastal waters and groundwater.

A.12 European Waste Framework Directive (2008) - Sets out the waste hierarchy requiring the reduction of waste production and its harmfulness, the recovery of waste by means of recycling, re-use or reclamation and final disposal that does not harm the environment, including human health.

A.13 European Industrial Emission Directive (2010) - Lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.

A.14 European Floods Directive (2007) - A framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity.

A.15 European Energy Performance of Buildings Directive (2010) - Aims to promote the energy

performance of buildings and building units. Requires the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance.

A.16 United Nations Paris Climate Change Agreement (2015) – International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

A.17 International Convention on Wetlands (Ramsar Convention) (1976) - International agreement with the aim of conserving and managing the use of wetlands and their resources.

A.18 European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979) - Aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

A.19 International Convention on Biological Diversity (1992) – International commitment to biodiversity conservation through national strategies and action plans.

A.20 European Habitats Directive (1992) - Together with the Birds Directive, the Habitats Directive sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

A.21 European Birds Directive (2009) - Requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

A.22 United Nations Declaration on Forests (New York Declaration) (2014)- Sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

A.23 United Nations (UNESCO) World Heritage Convention (1972) - Promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

A.24 European Convention for the Protection of the Architectural Heritage of Europe (1985) - Defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

A.25 European Landscape Convention (2002) - Promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

NATIONAL PLANS AND PROGRAMMES (BEYOND THE NPPF) OF MOST RELEVANCE FOR THE LOCAL PLAN REVIEW

Climate change adaption and mitigation

A.26 Defra, The National Adaptation Programme and the Third Strategy for Climate Adaptation

Reporting: Making the country resilient to a changing climate (2018) – sets out the strategy for adapting both to the climate change that is already evident, and that which we might see in the future.

A.27 The Transport Decarbonisation Plan: a better, greener Britain (TDP), published in July 2021, sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK.

A.28 Defra and the Environment Agency, Understanding the risks, empowering communities, building resilience: The National Flood and Coastal Erosion Risk Management Strategy for England (2020) - sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. An update to the document was adopted on 25th September 2020.

A.29 Ministry of Housing, Communities and Local Government, National Planning Policy for Waste (NPPW) (2014) – sets out a number of key planning objectives. It requires that local planning authorities help deliver sustainable development through measures including driving waste management up the waste hierarchy; ensuring that waste management is considered alongside other spatial planning concerns; and providing a framework in which communities can take more responsibility for their own waste.

A.30 The Industrial Decarbonisation Strategy (2021) aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy builds in the Prime Minister's 10 Point Plan for a Green Industrial Revolution and sets out the government's vision for building a competitive, greener future for the manufacturing and construction sector and is part of the government's path to net zero by 2050.

A.31 Defra, Waste Management Plan for England (2013) – sets out the measures for England to work towards a zero waste economy.

A.32 HM Government, The Clean Growth Strategy (2017) – sets out the approach of the government to secure growth of the national income while cutting greenhouse gas emissions. The key policies and proposals of the Strategy sit below a number of overarching principles: acceleration of clean growth including through recommendations for private and public investment to meet carbon budgets; providing support to improve business and industry energy efficiency; improving energy efficiency in the housing stock including through low carbon heating; accelerating the shift to low carbon transport; delivering clean, smart, flexible power; enhancing the benefits and value of our natural resources; leading in the public sector to meet emissions targets; and ensure Government leadership to drive clean growth.

A.33 The UK Hydrogen Strategy (2021) sets out the approach to developing a substantial low carbon hydrogen sector in the UK and to meet the ambition for 5GW of low carbon hydrogen production capacity by 2030.

A.34 British Energy Security Strategy (2022) seeks to reduce the UK's reliance on international fossil fuel markets to strengthen energy security and cut bills over the next decade. To enable this is a new ambition to produce 95% of the country's electricity from low-carbon sources by 2030. The strategy includes a range of new targets to accelerate the deployment of key low carbon technologies,

alongside renewed support for domestic oil and gas production.

A.35 The Energy Performance of Buildings Regulations (2021) seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

A.36 The Energy white paper: Powering our net zero future (2020) builds on the Prime Minister's Ten point plan for a green industrial revolution. The white paper addresses the transformation of the UK's energy system, promoting high skilled jobs and clean, resilient economic growth during its transition to net-zero emissions by 2050.

A.37 The Heat and Buildings Strategy (2021) sets out the government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050. Key aims of the strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial, and industrial buildings by 2030.
- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.
- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.
- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.
- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning- Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

A.38 The Net Zero Strategy: Build Back Greener (2021) - sets out policies and proposals for

decarbonising all sectors of the UK economy to meet net zero targets by 2050. It sets out strategies to keep the UK on track with carbon budgets, outlines the National Determined Contribution (NDC) and sets out the vision for a decarbonised economy in 2050. Its focus includes:

- Policies and proposals for reducing emissions across the economy in key sectors (power, fuel supply and hydrogen, industry, heat and buildings, transport, natural gas and waste); and,
- Policies and proposals for supporting transition across the economy through innovation, green investment, green jobs, embedding net-zero in government, local climate action, empowering people and businesses, and international leadership and collaboration.

A.39 The 25 Year Environment Plan - sets out policy priorities with respect to responding to climate change, are using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
- Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
- Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

A.40 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting (2018) sets out visions for the following sectors:

- People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.
- Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.
- Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”
- Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”
- Local Government – “Local government plays a central in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.

A.41 UK Climate Change Risk Assessment 2017: sets out six priority areas needing urgent further action over the next five years. These include:

- flooding and coastal change risks to communities, businesses and infrastructure,
- health, well-being and productivity from high temperatures, shortages in public water supply, and for agriculture, energy generation and industry with impacts on freshwater ecology, natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity,
- domestic and international food production and trade and
- new and emerging pests and diseases and invasive non-native species affecting people, plants and animals

A.42 The Energy Efficiency Strategy (2012) aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

A.43 The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009): sets out a five-point plan to tackle climate change. The points are as follows: protecting the public from immediate risk, preparing for the future, limiting the severity of future climate change through a new international climate agreement, building a low carbon UK and supporting individuals, communities and businesses to play their part.

A.44 The UK Renewable Energy Strategy (2009) describes out the ways in which we will tackle climate change by reducing our CO2 emissions through the generation of a renewable electricity, heat and transport technologies. Health and well-being

A.45 National Design Guide (2021) - sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

A.46 Build Back Better: Our Plan for Health and Social Care (2021) sets out the government's new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

A.47 Covid-19 mental health and wellbeing recovery action plan (2021) - sets out the government's plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing, to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes, and to support services to meet the need for specialist support.

A.48 The Charter for Social Housing Residents: Social Housing White Paper (2020) sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

A.49 Using the planning system to promote healthy weight environments (2020), Addendum (2021) provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

A.50 Healthy Lives, Healthy People: Our strategy for public health in England: Sets out how the Government's approach to public health challenges will:

- Protect the population from health threats – led by central Government, with a strong system to the frontline.

- Empower local leadership and encourage wide responsibility across society to improve everyone's health and wellbeing and tackle the wider factors that influence it.
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework.
- Reflect the Government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier.
- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

A.51 Fair Society, Healthy Lives (2011) - investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

A.52 Homes England Strategic Plan 2018 to 2023: Sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

A.53 Select Committee on Public Service and Demographic Change report Ready for Ageing? (2013) - warns that society is underprepared for the ageing population. The report states "longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises". The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

A.54 Public Health England, PHE Strategy 2020-25 - identifies PHE's priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

A.55 HM Government, Laying the foundations: a housing strategy for England (2011) – aims to provide support to the delivery of new homes and to improve social mobility.

A.57 Planning Policy for Traveller Sites (2015) sets out the Government's planning policy for traveller sites. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

A.58 Environment (biodiversity/geodiversity, landscape and soils)The Environment Act 2021 - sets out the UK's new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation of the natural environment of the land or its natural resources, or to conserve the place or setting of the land for its 'archaeological, architectural, artistic, cultural or historic interest.'

A.59 Defra, Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) - Guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss,

supporting healthy ecosystems and establishing ecological networks.

A.60 Defra, Biodiversity offsetting in England Green Paper (2013) - sets out a framework for biodiversity offsetting. Offsets are conservation activities designed to compensate for residual losses.

A.61 Defra, Safeguarding our Soils – A Strategy for England (2009) – Sets out how England’s soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and; dealing with contaminated land.

A.62 Biodiversity 2020: A strategy for England’s wildlife and ecosystem services (2011) guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks. The Strategy includes 22 priorities which include actions for the following sectors: Agriculture, Forestry, Planning & Development, Water Management, Marine Management, Fisheries, Air Pollution and Invasive Non-Native Species.

A.63 England Biodiversity Strategy Climate Change Adaptation Principles (2008): sets out principles to guide adaptation to climate change. The principles Appendix A Review of Plans, Policies and Programmes Rugby Borough Gypsy and Traveller Site Allocations DPD 120 are: take practical action now, maintain and increase ecological resilience, accommodate change, integrate action across all sectors and develop knowledge and plan strategically. The precautionary principle underpin all of these.

Historic environment

A.64 The Heritage Alliance, Heritage 2020 – sets out the historic environment sector’s plan for its priorities between 2015 and 2020.

A.65 Historic England, Corporate Plan 2018-2021 - contains the action plan which sets out how the aims of the corporate plan will be delivered. The plan includes priorities to demonstrate how Historic England will continue to work towards delivering the heritage sector’s priorities for the historic environment.

A.66 Historic England, Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8 (2016) – sets out Historic England’s guidance and expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment processes.

Water and air

A.67 Environment Agency, Managing Water Abstraction (2016) - is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

A.68 Defra, Water White Paper (2012): Sets out the Government’s vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

A.69 Defra, Clean Air Strategy (2019) - sets out the comprehensive action that is required from across all parts of government and society to meet goals relating to ensuring cleaner air. This is to be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. The UK has set stringent targets to cut emissions by 2020 and 2030.

A.70 Our Waste, Our Resources: A strategy for England (2018) - aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

A.71 The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017) provides the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULEVs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

A.72 The Waste (Circular Economy) (Amendment) Regulations (2020) - amend a range of legislation to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

A.73 The Water Supply (Water Quality) Regulations focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

A.74 The Road to Zero (2018) sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

A.75 Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018) - sets out goals for improving the environment over the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. The gov.uk website notes that the 25 Year Plan sits alongside two other important government strategies: the Industrial Strategy and Clean Growth Strategy (the former summarised in the Economic growth section below, the latter under Climate Change above).

A.76 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007) sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles and

identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term.
- Provide benefits to health quality of life and the environment.

Economic growth

A.77 National Infrastructure Strategy (2020) - sets out the government's plans for different types of infrastructure to support delivery of housing and social infrastructure.

A.78 HM Government, Industrial Strategy: building a Britain fit for the future (2017) – sets out a long-term policy framework for how Britain will be built to be fit for the future in terms of creating successful, competitive and open economy. It is shaped around five 'foundations of productivity' – the essential attributes of every successful economy: Ideas (the world's most innovative economy); People (good jobs and greater earning power for all); Infrastructure (a major upgrade to the UK's infrastructure); Business Environment (the best place to start and grow a business); Places (prosperous communities across the UK).

A.79 Build Back Better: Our Plan for Growth (2021) - Sets out a plan to 'build back better' tackling long-term problems to deliver growth that delivers high quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

Transport

A.80 Transport Investment Strategy (2017): Sets out four objectives that the strategy aims to achieve:

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;
- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

A.81 Highways England Sustainable Development Strategy and Action Plan (2017): This strategy is designed to communicate the company's approach and priorities for sustainable development to its key stakeholders. Highways England aims to ensure its action in the future will further reduce the impact of its activities seeking a long-term and sustainable benefit to the environment and the communities it serves. The action plan describes how Highways England will progress the aspirations of their Sustainable Development and Environment Strategies. It describes actions that will enable the company to deliver sustainable development and to help protect and improve the environment.

SUB-NATIONAL PLANS AND PROGRAMMES OF MOST RELEVANCE FOR THE LOCAL PLAN REVIEW

Coventry & Warwickshire

A.82 The Health and Wellbeing Strategy (HWS) is Warwickshire's high-level plan for improving health and wellbeing and reducing differences, or inequalities, in health within Warwickshire

<https://api.warwickshire.gov.uk/documents/WCCC-1350011118-2972>

A.83 Warwickshire County Council have a number of strategies that will impact on Rugby's environment, these are not listed in priority order

<https://www.warwickshire.gov.uk/directory-record/2244/voluntary-and-community-sector-strategy-2020-2025>

<https://www.warwickshire.gov.uk/directory-record/2243/warwickshire-s-heritage-and-culture-strategy-2020-2025>

<https://democracy.warwickshire.gov.uk/documents/s16027/Appendix%20for%20Warwickshire%20Waterway%20Canal%20Strategy%202020-2025.pdf>

<https://www.warwickshire.gov.uk/directory-record/2149/local-transport-plan-2011-2026>

<https://democracy.warwickshire.gov.uk/documents/s9533/Digital%20Strategy%20for%205G%20and%20Digital%20Connectivity.pdf>

<https://api.warwickshire.gov.uk/documents/WCCC-359457248-38> (Economic Growth Strategy)

<https://api.warwickshire.gov.uk/documents/WCCC-680-282> (Waste Development Framework)

<https://www.warwickshire.gov.uk/flooding/flood-risk-management-surface-water-management-plan>

<https://api.warwickshire.gov.uk/documents/WCCC-970487194-283> (Electric Vehicles Infrastructure)

<https://www.warwickshire.gov.uk/biodiversitystrategy>

<https://www.warwickshire.gov.uk/directory-record/2138/energy-strategy-and-policy>

<https://api.warwickshire.gov.uk/documents/WCCC-970487194-271> (Levelling Up)

A.84 The authorities around Rugby have adopted local plans or are in the process of updating them.

- Coventry <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031>
- North Warwickshire https://www.northwarks.gov.uk/downloads/download/2682/adopted_local_plan_2021
- Nuneaton & Bedworth have an adopted local plan but are undertaking an early review https://www.nuneatonandbedworth.gov.uk/downloads/download/819/borough_plan_review_preferred_options
- Warwick District Council https://www.warwickdc.gov.uk/downloads/file/4623/new_local_plan Stratford on Avon <https://www.stratford.gov.uk/templates/server/document-relay.cfm?doc=173518&name=SDC%20CORE%20STRATEGY%202011%202031%20July%202016.pdf>
- Stratford and Warwick have decided to produce a joint local plan <https://www.southwarwickshire.org.uk/swlp/>

Rugby

A.85 All the evidence that underpinned the adoption of the Rugby Local Plan (2011-2031) may still be of relevance and is available here

https://www.rugby.gov.uk/info/20004/planning_strategy/348/local_plan_2011-2031/2

A.86 The Council adopted a Corporate Strategy 2021-2024 that sets out the overall direction for the work of local public services in Rugby

https://www.rugby.gov.uk/downloads/file/2813/corporate_strategy_2021-24

A.87 The Council's Town Centre Regeneration Strategy for Rugby was adopted in December 2022. This can be accessed here:

https://www.rugby.gov.uk/downloads/file/3558/rugby_town_centre_regeneration_strategy

Appendix 6 - EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published online.
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Minakshee Patel
Corporate Equality & Diversity Advisor
minakshee.patel@rugby.gov.uk
Tel: 01788 533509

Equality Impact Assessment

Service Area	Development Strategy
Policy/Service being assessed	Local Development Scheme update and new Local Plan issues and options consultation.
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	This is a new policy. The new Local Development Scheme sets out the timetable for producing a new local plan. The new local plan will eventually replace the existing local plan. This consultation is a requirement as part of the process of preparing a new local plan.
EqlA Review team – List of members	Neil Holly – Development Strategy Manager
Date of this assessment	4 th August 2023
Signature of responsible officer (to be signed after the EqlA has been completed)	Neil Holly

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Advisor.

If you require help, advice and support to complete the forms, please contact Minakshee Patel, Corporate Equality & Diversity Advisor via email: minakshee.patel@rugby.gov.uk or 01788 533509

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Scoping and Defining</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	<p>The report seeks cabinet and council approval to (1) discontinuing preparation of the Gypsy and Traveller Site Allocations DPD, (2) adopting an updated Local Development Scheme and (3) undertaking public consultation on the new Local Plan Issues and Options paper.</p> <p>The Local Development Scheme sets out the council’s timetable for producing new planning policies.</p> <p>The discontinuance of the Gypsy and Traveller Site Allocations DPD is given effect through adopting the updated Local Development Scheme. It is proposed that Gypsy and Traveller site allocations are now taken forward as part of the new Local Plan.</p> <p>The new Local Plan Issues and Option document contains no new policies or site allocations. It outlines some of the significant planning issues facing the borough and seeks the views of local businesses, residents and other stakeholders on how the council should respond to those issues through the new Local Plan.</p>
(2) How does it fit with Rugby Borough Council’s Corporate priorities and your service area priorities?	<p>It primarily fits in with priorities on:</p> <ul style="list-style-type: none"> • Rugby Borough Council is a responsible, effective and efficient organisation. • Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents.
(3) What are the expected outcomes you are hoping to achieve?	<p>The Local Development Scheme aims to set a realistic programme for preparing planning policies.</p> <p>The issues and options consultation aims to seek input from various stakeholders on the content of the new Local Plan. It is hoped this will enable a better plan to be prepared.</p>

<p>(4) Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>The issues and options consultation does not affect customers/employees or wider groups save insofar as it provides them with an opportunity to input into preparation of the council's future local plan.</p> <p>The decision to discontinue the Gypsy and Traveller Site Allocations DPD does affect Gypsies and Travellers.</p>
<p><u>Stage 2 - Information Gathering</u></p>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>
<p>(1) What does the information tell you about those groups identified?</p>	<p>The principal groups affected are Gypsies and Travellers. These are ethnic groups.</p>
<p>(2) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement? If yes, what were their views and how have their views influenced your decision?</p>	<p>We consulted on a Gypsy and Traveller Site Allocations DPD Issues and Options document in autumn 2022. At the same time, we conducted a call for sites.</p> <p>No sites were put forward. Therefore, there are not sites available to meet the future accommodation needs of Gypsies and Travellers. On this basis it is proposed to discontinue the separate Gypsy and Traveller DPD.</p> <p>The views of the Gypsy and Traveller community were not specifically sought on the decision to discontinue the DPD.</p>
<p>(3) If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>There will be an opportunity for communities to comment on the discontinuance of the Gypsy and Traveller Site Allocations DPD as part of the new Local Plan issues and options consultation.</p>
<p><u>Stage 3 – Analysis of impact</u></p>	

<p>(1)Protected Characteristics From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	<p>RACE</p> <p>Yes, Romany Gypsies and Irish Travellers. Romany Gypsies and Irish Travellers are ethnic groups under the Equality Act 2010. Discontinuing the Gypsy and Traveller Site Allocations DPD could have an adverse impact on Gypsies and Travellers if it were to delay the meeting of their accommodation needs. However, it is not considered that incorporating Gypsy and Traveller site allocations into the new Local Plan will delay meeting those needs compared to continuing with a separate Gypsy and Traveller Site Allocations DPD. Additionally, incorporation into the new plan allows a wider range of options to be explored for meeting those needs.</p>	<p>DISABILITY</p>	<p>GENDER</p>
	<p>MARRIAGE/CIVIL PARTNERSHIP</p>	<p>AGE</p>	<p>GENDER REASSIGNMENT</p>

	RELIGION/BELIEF	PREGNANCY MATERNITY	SEXUAL ORIENTATION
<p><u>(2) Cross cutting themes</u></p> <p>(a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?</p> <p>(b) Are your proposals likely to impact on a carer who looks after older people or people with disabilities? If yes, please explain how?</p>	Not at this stage.		
(3) If there is an adverse impact, can this be justified?	N/A		
(4) What actions are going to be taken to reduce or eliminate negative or adverse impact? (this should form part of your action plan under Stage 4.)	N/A		
(5) How does the strategy/service/policy contribute to the promotion of equality? If not what can be done?	When the new Local Plan is produced, this will be done with the objective of promoting equality.		
(6) How does the strategy/service/policy promote good relations between groups? If not what can be done?	Not at this stage, when new policies and site allocations are developed at a later stage they will represent the opportunity to promote good relations.		
(7) Are there any obvious barriers to accessing the service? If yes how can they be overcome?	N/A		

<u>Stage 4 – Action Planning, Review & Monitoring</u>																														
<p>If No Further Action is required then go to – Review & Monitoring</p> <p>(1) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>No further action is required.</p> <p>EqlA Action Plan</p> <table border="1" data-bbox="891 536 2130 767"> <thead> <tr> <th data-bbox="891 536 1135 612">Action</th> <th data-bbox="1135 536 1379 612">Lead Officer</th> <th data-bbox="1379 536 1624 612">Date for completion</th> <th data-bbox="1624 536 1868 612">Resource requirements</th> <th data-bbox="1868 536 2130 612">Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="891 612 1135 651"></td> <td data-bbox="1135 612 1379 651"></td> <td data-bbox="1379 612 1624 651"></td> <td data-bbox="1624 612 1868 651"></td> <td data-bbox="1868 612 2130 651"></td> </tr> <tr> <td data-bbox="891 651 1135 689"></td> <td data-bbox="1135 651 1379 689"></td> <td data-bbox="1379 651 1624 689"></td> <td data-bbox="1624 651 1868 689"></td> <td data-bbox="1868 651 2130 689"></td> </tr> <tr> <td data-bbox="891 689 1135 727"></td> <td data-bbox="1135 689 1379 727"></td> <td data-bbox="1379 689 1624 727"></td> <td data-bbox="1624 689 1868 727"></td> <td data-bbox="1868 689 2130 727"></td> </tr> <tr> <td data-bbox="891 727 1135 767"></td> <td data-bbox="1135 727 1379 767"></td> <td data-bbox="1379 727 1624 767"></td> <td data-bbox="1624 727 1868 767"></td> <td data-bbox="1868 727 2130 767"></td> </tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(2) Review and Monitoring State how and when you will monitor policy and Action Plan</p>	<p>This EqlA will be reviewed again when the next stage of the plan is presented to Cabinet, probably in spring 2024.</p>																													

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).’

Appendix 7 – Project Risk Register

RUGBY BOROUGH COUNCIL PROJECT RISK REGISTER

Project: updated Local Plan (October 2023)

Objective: to prepare and adopt a new local plan for the borough

		Likelihood			
Impact	4	M	H	H	H
	3	L	M	H	H
	2	L	M	M	H
	1	L	L	M	M
		1	2	3	4

Risk	Opportunities	Consequences	Controls	Responsibility	Assessment of Risk		
					Likelihood	Impact	Risk Score
					2	4	6
1. Potential finding of an inspector that the new Local Plan is not legally compliant or is not sound..		<ul style="list-style-type: none"> - Delay as potential need to re-consult on modifications, go back and re-do parts of the process or even withdraw the plan - Reputational damage. - Stakeholder concerns/complaints - Adverse media coverage - Risk of legal challenge - Delay in getting a plan adopted, leading to loss of appeals 	<ul style="list-style-type: none"> - Compliance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Planning and Compulsory Purchase Act 2004. - Compliance with national policy and guidance. - Effective joint working with duty to cooperate partners. - Holding two Regulation 18 public consultations. - Careful consideration of representations made. - Preparation of proportionate evidence to support the plan's policies. - Consideration of reasonable alternatives through the sustainability appraisal process. - Potential for a legal review prior to plan submission (if deemed to be required). 	Chief Officer Growth and Investment/ Development Strategy Manager			

Risk	Opportunities	Consequences	Controls	Responsibility	Assessment of Risk		
					Likelihood	Impact	Risk Score
2. Loss of team members / inadequate resourcing / inability to fill posts		<ul style="list-style-type: none"> - Lack of continuity, loss of institutional knowledge - Delay - Increased costs through need to use consultants 	<ul style="list-style-type: none"> - Prioritisation and effective time management to maximise the resources we have - Communication - Effective recruitment - Flexible use of resources within the planning department to assist - Potential use of consultants if necessary 	Chief Officer Growth and Investment/ Development Strategy Manager	4	3	7
3. Delay to the local plan process due to changes to government policy	Opportunities to reflect new national policy.	<ul style="list-style-type: none"> - Increased or wasted costs - Delay - Public perception 	<ul style="list-style-type: none"> - Monitoring and responding to government policy, including responding to consultations - Keeping the local development scheme under review 	Chief Officer Growth and Investment/ Development Strategy Manager	4	3	7
4. Failure to meet the government's proposed 30 June 2025 cut off date for preparing a plan under the current plan-making system		<ul style="list-style-type: none"> - Wasted cost and effort - Delay in getting a plan adopted as need to go back and re-do parts of the process and update evidence. - Public perception - Increased risk of losing appeals due to policies being out of date 	<ul style="list-style-type: none"> - Effective project management - Keeping the position and progress under review - Delaying significant spending on evidence 	Chief Officer Growth and Investment/ Development Strategy Manager	3	3	6
5. Change of political party/control of the council results in policy or financial changes impacting project delivery	Review of project	<ul style="list-style-type: none"> - Delay - Increased or wasted costs - Reputational damage 	<ul style="list-style-type: none"> - Use of Planning Services Working Party to seek cross-party support. - Council decision making at relevant stages. 	Chief Officer Growth and Investment/ Development Strategy Manager	3	3	6

Risk	Opportunities	Consequences	Controls	Responsibility	Assessment of Risk		
					Likelihood	Impact	Risk Score
6. Political disagreement with neighbouring authorities/ ineffective cooperation		<ul style="list-style-type: none"> - Failure to meet duty to cooperate (see risk 1 above) - Reputational damage - Delay 	<ul style="list-style-type: none"> - Joint working through the Coventry, Warwickshire and Solihull Association of Planning Officers (CSWAPO) - Preparation of statements of common ground 	Chief Officer Growth and Investment/ Development Strategy Manager	2	4	6
7. Delays in consultants providing evidence/ poor quality evidence		<ul style="list-style-type: none"> - Delay - Increased cost if need to re-do evidence 	<ul style="list-style-type: none"> - Joint procurement of evidence with CSWAPO - Effective procurement procedures including writing clear briefs - Careful and ongoing management of consultants 	Chief Officer Growth and Investment/ Development Strategy Manager	1	2	3
8. Cost overruns		<ul style="list-style-type: none"> - Reputational damage - Budgetary pressures 	<ul style="list-style-type: none"> - Focussing evidence tightly on justifying policies - Joint commissioning of evidence with neighbouring authorities - Effective project management 	Chief Officer Growth and Investment/ Development Strategy Manager	3	2	5

Appendix 8 – Climate Change and Environmental Impact Assessment

Rugby Borough Council

Climate Change and Environmental Impact Assessment

Local Plan Review –Issues & Options consultation – October 2023

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action. Rugby Borough Council declared a climate emergency in 2019, in doing so committed to:

- To move the Council's operations towards Carbon Neutrality by 2030.
- To establish action to tackle climate change as a key driver of all decision-making.
- To provide community leadership in reducing the impact of Climate Change.
- To take action to mitigate the impact of climate change on a Borough wide basis and beyond, through adaptation.

The Council's Corporate Strategy (2021-24) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes carbon emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to the Deputy Executive Director.

If you require help, advice and support to complete the forms, please contact Dan Green, Deputy Executive Director.

SECTION 1: OVERVIEW

Portfolio and Service Area	Growth and Investment
Policy/Service/Change being assessed	The council is preparing a new local plan to update the Rugby Borough Local Plan 2011-2031. The issues and options consultation is the first stage of consultation on the new Local Plan.
Is this a new or existing Policy/Service/Change?	A new policy
If existing policy/service please state date of last assessment	No previous assessment.
Ward Specific Impacts	Borough-wide.
Summary of assessment Briefly summarise the policy/service/change and potential impacts.	This report seeks member approval to undertake public consultation on the Local Plan Issues and Options document. This is the first formal stage in preparing a new local plan. The Issues and Options document contains no new policies or site allocations. However, policy options for responses to climate change are identified. No potential impacts are identified at this stage.
Completed By	Neil Holly (Development Strategy Manager)
Authorised By	Nicola Smith (Head of Growth & investment)
Date of Assessment	23 August 2023

SECTION 2: IMPACT ASSESSMENT

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Energy usage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	This stage of the plan production does not have any impact on climate change or the environment. At a later stage, when policies are included, an assessment of their environmental impact can be made.			
Fleet usage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Sustainable Transport/Travel (customers and staff)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Community leadership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Biodiversity and habitats	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Adaptation/Mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Impact on other providers/partners	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 3: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	Next stage of the local plan preparation process – preferred options public consultation.
Key points to be considered through review	No negative impacts have been identified at this stage.
Person responsible for review	Neil Holly (Development Strategy Manager) – Development Strategy
Authorised by	Nicola Smith (Head of Growth & Investment)