

Rugby Borough Council

Borough Plan Review- Issues and Options Consultation-Regulation 18 Consultation

February 2024

<https://www.rugby.gov.uk/w/local-plan-review-issues-and-options-consultation>

Joint Comments from Warwick and Stratford-on-Avon District Councils

Background

Rugby Borough Council (RBC) adopted its Borough (Local) Plan on 4th June 2019. Planning regulations require local authorities to review their plan every five years. The Council is consulting upon its Issues and Options document which is the first step of the Plan review process. The Council are also undertaking a Call for Sites exercise alongside this consultation.

Comments - Land for Employment uses.

The table on page 11 sets out the office requirement for two plan period scenarios, 2021-2041 and 2021-2050 as identified in the Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA) (2022). It is noted that the authority will have a clearer idea of the land that is needed for other employment uses once the new West Midlands Strategic Employment Sites Study has been completed. Paragraph 3.30 of the document highlights that the Council is planning for 208 hectares of employment land between 2011-2031 which includes 98 ha to accommodate Coventry City Council's unmet need. However, this consultation document does not include any figure for unmet need from Coventry but acknowledges that Rugby will need to contribute to any unmet need.

Paragraph 3.37 and the table on Page 15 of the Issues and Options document shows Rugby's own need for industrial land and excludes Coventry and Warwickshire's strategic warehousing need and Rugby's own office need. Two scenarios have been presented with no additional supply being needed if the plan period is to 2021-2041 but a need for an additional 40.29ha if the plan period is 2021-2050.

Paragraph 3.16 of the document also notes the need to allocate additional sites for warehouses due to Rugby's location within the "Golden Triangle" for distribution. The Council also notes that the new West Midlands Strategic Employment Sites Study which was not available at the time of writing the document will provide figures for strategic warehousing to enable discussions amongst authorities to agree on how to split this figure.

We consider that the Council is willing to work with other authorities under Duty to Cooperate and this approach is welcomed.

Comments - Potential locations for employment in the Green Belt

The Issues and Options document indicates a number of potential employment locations which lie within the West Midlands Green Belt. Stratford and Warwick Councils will shortly be undertaking a

Green Belt review as part of the South Warwickshire Local Plan. A consistent approach to Green Belt reviews across the Coventry and Warwickshire sub-region would be welcomed.

Comments - Pitches for Gypsies and Travellers

Warwick and Stratford Councils are producing a joint Gypsy and Traveller Accommodation Assessment which will provide an up-to-date position regarding need across South Warwickshire.

The Rugby Issues and Options document presents the possibility of asking neighbouring Warwickshire authorities to accommodate some of Rugby's need for Gypsy and Traveller pitches. As a general principle, Councils should seek to provide for their need within their own boundaries, unless it can be demonstrated that this is not achievable. In the first instance, Rugby BC is encouraged to meet its need through the options in the 5 bullet points of paragraph 5.13, prior to seeking any unmet need to be provided elsewhere in Warwickshire. It should be noted that South Warwickshire has an existing unmet need for Gypsy and Traveller pitches, due to a lack of sites coming forward; the emerging South Warwickshire Local Plan will seek to address this need.

Comments - Land for Housebuilding

The Rugby Issues and Options document has identified a total supply of homes already identified to be 13,056 if the plan runs till 2041 and 15,346 if the plan period runs to 2051 for both minimum local housing need and HEDNA. Tables on Page 51 of the document show the already identified supply for a plan period between 2021-2041 and for a plan period between 2021-2050 as well as the total housing need for each period, with and without a 10% supply buffer.

Scenario	Minimum local housing need	HEDNA 2022
Houses each year	506	735
Total houses 2021-2041	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 2021-2050	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	No additional supply needed	8,101

As illustrated in the tables above the supply to be found using the methodology set out in the HEDNA 2022 is far higher than using the minimum local housing need. The Council has not indicated which figure they will be taking forward and ask for comments on this through the consultation. We agree that RBC as an absolute minimum must meet its minimum local housing need although would strongly encourage the Council to consider the alternative approach suggested in the HEDNA as it provides more robust basis for assessing and meeting housing needs in Coventry and Warwickshire.

The Council has not yet produced a Housing and Economic Land Availability Assessment (HELAA) making it difficult to know which sites will be potentially suitable for housing development.

The Council is also undertaking a “Call for Sites” exercise and at this early stage it is difficult to predict what sites may come forward as a result of that exercise.

The Issues and Options question asks how many homes the Council should be planning for. The approach to identifying housing requirements needs to be robustly justified, supported by evidence and in line with national policy.

Some general comments:

- It will be helpful to number the tables and figures and include them in the glossary.
- NPPF does require local plan to include policies on healthy and safe communities. It may be helpful to include policies relating to health and wellbeing in the next iteration of the Plan.

Duty to Cooperate/ Strategic Issues

The document does not explicitly mention the requirements of Duty-to-Cooperate. However, it should be noted that both Stratford and Warwick Councils have worked collaboratively with other Coventry and Warwickshire authorities including Rugby in commissioning the HEDNA and continue to meet regularly as a part of Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO) group. The CSWAPO group meets to discuss key strategic and cross boundary issues including the DtC requirements.

Therefore, we note that the Council is willing to work with the neighbouring authorities on strategic matters and identify any cross-boundary issues. This approach is welcomed, and we hope that the authority continues to have a constructive dialogue with the neighbouring authorities as the plan progresses