

#1

COMPLETE

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Page 1: Introduction

Q1 Respondent skipped this question

To what extent do you agree with the selection of these objectives?

Q2 Respondent skipped this question

What are the reasons for your answer to question 1?

Page 2: Strategy for homes and residential allocations (policies S2 and S6)

Q3 Respondent skipped this question

To what extent do you agree with the more dispersed overall spatial strategy for new homes?

Q4 Respondent skipped this question

What are the reasons for your answer to question 3 and if you disagree with the proposed spatial strategy what alternative should we pursue?

Q5 Respondent skipped this question

Is there a site that is proposed to be allocated for housing in policy S6 that you do not support? If so, which site and why?

Q6 Respondent skipped this question

The development sites annex lists development requirements for the allocated sites. Are there additional or different requirements we should be seeking? Please specify which site you are referring to.

Page 3: Strategy for employment land and employment allocations (policies S3 and S7)

Q7 Respondent skipped this question

To what extent do you agree with the strategy for employment land?

Q8 Respondent skipped this question

What are the reasons for your answer to question 7? If you disagree, what alternative location(s) would be better and why?

Page 4: Gypsy and Traveller sites (policy S4)

Q9 Respondent skipped this question

To what extent do you agree with policy S4?

Q10 Respondent skipped this question

What are the reasons for your answer to question 9?

Page 5: Climate

Q11 Disagree

To what extent do you agree with the approach to reducing emissions and adapting to the effects of climate change?

Q12

What are the reasons for your answer to question 11?

CL1 Net zero buildings

Whilst the Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and climate standards from adoption of the plan that may go beyond government targets. However, it is our view that any requirement should be 'stepped' in line with Government targets and the proposed changes to the building regulations to ensure that any requirement is achievable and viable. The entire industry needs to adjust to zero carbon requirements in line with the advancement of technology, scaling up and economies of scale. Where policies seek to go beyond this curve, there is a danger that these requirements result in a significant reduction in housing delivery within those areas due to financial viability constraints.

This approach is confirmed within the Ministerial Statement (statement no : Statement UIN HCWS123 available from Written statements - Written questions, answers and statements - UK Parliament) released on 13th December 2023. The ministerial statement confirms that with respect to the net zero goal....

'The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale' and 'To be sound, local plans must be consistent with national policy enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one'.

Deleting the policy and aligning the Council's requirement for carbon neutral development with those of Government would therefore be pragmatic, more achievable and consistent with national policy.

Recommendation

- The policy is deleted as Net Zero Carbon development is to be dealt with via the Building Regulations; or
- Additional wording to section A

A. New buildings comprising one or more dwellings and new non-residential buildings of 100m² gross internal area or more must be designed and built to be net zero carbon in operation, in line with government targets. Agreed measures will be secured through conditions.

Page 6: Economy

Q13

Respondent skipped this question

To what extent do you agree with the document's economic policies?

Q14

Respondent skipped this question

What are the reasons for your answer to question 13?

Page 7: Centres

Q15

Respondent skipped this question

To what extent do you agree with the policies for retail centres?

Q16

Respondent skipped this question

What are the reasons for your answer to question 15?

Page 8: Environment

Q17

Respondent skipped this question

To what extent do you agree with the document's environmental policies?

Q18

Respondent skipped this question

What are the reasons for your answer to question 17?

Page 9: Housing

Q19

Strongly Disagree

To what extent do you agree with the document's housing policies?

Q20

What are the reasons for your answer to question 19?

Please see Letter from McCarthy Stone (MS) and Churchill Living (CL) date 19.05.25 with full response as unable to answer question in space below.

Recommendations include:

H2 Affordable housing

Recommendation:

Based on the non-viability of Older Persons' Housing to provide affordable housing, and the lack of need for specialist housing with care, add a new point F to Policy H2 which states:

F. Schemes delivering housing for older people are exempt from delivering affordable housing.

Add new para after 6.8 to read:

Schemes delivering housing for older people are exempt from delivering affordable housing. This is based on the analysis within the Local Plan Viability Assessment March 2025 that confirms that older person's housing is unlikely to be viable in Rugby

Review Mechanism

Recommendation

- The policy is deleted as Net Zero Carbon development is to be dealt with via the Building Regulations; or
- Additional wording to section A

A. New buildings comprising one or more dwellings and new non-residential buildings of 100m² gross internal area or more must be designed and built to be net zero carbon in operation, in line with government targets. Agreed measures will be secured through conditions.

Page 10: Wellbeing

Q21

Respondent skipped this question

To what extent do you agree with the document's wellbeing policies?

Q22

Respondent skipped this question

What are the reasons for your answer to question 21?

Page 11: Design

Q23

Respondent skipped this question

To what extent do you agree with the document's design policies?

Q24

Respondent skipped this question

What are the reasons for your answer to question 23?

Page 12: Infrastructure

Q25

Strongly Disagree

To what extent do you agree with the document's infrastructure policies?

Q26

What are the reasons for your answer to question 25?

I2 Parking

Paragraph A of the policy says:

A. Adequate parking shall be provided for bicycles and vehicles (including motorcycles) in accordance with the parking standards in Appendix 1. This will include the provision of vehicle parking to meet the needs of people with disabilities or impaired mobility.

Appendix 1 provides the following table for Active Elderly: sheltered housing

Older person's housing and in particular Extra Care accommodation, is used by older people who tend to be frail and are likely to have mobility difficulties. Were an older person likely to cycle on regular basis it would be unlikely they would require extra care accommodation.

A survey of 242 McCarthy and Stone Retirement Living units showed only 7 bicycles owned by residents in these apartments. This is an ownership rate of 0.0289 cycles per apartment or 1 cycle per 35 apartments. Churchill Living's own data across 5,202 existing units (across 127 developments) showed a demand for 0.01755 per apartment. For a 45-unit scheme this would equate to less than 1 space (including allowance for Lodge Managers who cycle to work).

Whilst we can understand the rationale behind encouraging cycling in the general population, we consider that a requirement for cycle spaces in specialist older persons' housing to be inappropriate and unnecessary. Both companies provide an internal mobility scooter store for use by residents which is a far more relevant requirement and in the handful of instances that a resident has used a bicycle it can be stored in this area.

We consider the cycle parking requirements for older persons' housing would constitute overprovision in our experience and cycle parking should be limited to staff and visitors accordingly.

Page 13: Any Other Feedback

Q27

If there are any other comments you wish to make regarding the consultation document which you have not already given in your preceding answers, please enter them here:

Please see letter from The Planning Bureau Ltd on behalf of McCarthy and Stone and Churchill Living dated 19th May 2025 for full response to the Preferred Options consultation.

Page 14: About you

Q28

What is your name?

[REDACTED]

Q29

What organisation are you representing, if applicable?

[REDACTED]

Q30

No

Are you a resident of Rugby Borough?

Q31

Your contact email

[REDACTED]

Q32

Your contact address

[REDACTED]

[REDACTED]

[REDACTED]

Q33

Your Postcode

[REDACTED]

Q34

What is your Gender Identity?

[REDACTED]

Q35

Respondent skipped this question

Age

Q36

Respondent skipped this question

Ethnicity

Q37

Respondent skipped this question

Do you consider yourself to be disabled?

Q38

Respondent skipped this question

What is your sexual orientation?

Q39

Respondent skipped this question

What is your religion or belief?
