

#1

COMPLETE

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Page 1: Introduction

Q1 **Agree**

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

Q2

What are the reasons for your answer to question 1?

No comment

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

Q3 **Agree**

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

Q4

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

Urban extensions with limited sustainable village sites would be the best strategy. Urban extensions do not need to be new settlements.

Q5

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?

Lodge Farm would be wholly unsustainable. Its neither accessible by alternative modes of transport and not big enough to become self sufficient and sustainable like Houlton.

Q6

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.

No comment

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

Q7 **Agree**

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

Q8

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

no comment

Page 4: Gypsy and Traveller sites (policy S4)

Q9 **Agree**

To what extent do you agree with policy S4?

Q10

What are the reasons for your answer to question 9?

no comment

Page 5: Climate

Q11 **Neither Agree nor 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?

Is this not duplicating building control (CL3, CL4) ?

Page 6: Economy

Q13 **Agree**

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

Q14

What are the reasons for your answer to question 13?

no comment

Page 7: Centres

Q15

Agree

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

Q16

What are the reasons for your answer to question 15?

Agree, however more needs to be done in respect of the town centre. High Street retail has effectively gone due to online retail, so RBC needs to be looking at 24 hour communities with flats, leisure, food offer, convenience stores, entertainment etc. A strategy is needed with attainable goals and an implementation plan setting out how to achieve them.

Page 8: Environment

Q17

Agree

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

Q18

What are the reasons for your answer to question 17?

However, RBC needs to be careful (as does the government) with BNG. It is far too complicated and a bottleneck in the planning system. On non mandatory BNG sites, i.e. exempt ones RBC could ease the bottleneck by taking a professional view. E.g. Of course 10%+ BNG will be achieved on a brownfield site through the landscaping scheme. A BNG report and sustainability matrix should not be required to demonstrate what should be obvious. There aren't enough ecologists so a more practical stance needs to be taken.

Page 9: Housing

Q19

Disagree

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

Q20

What are the reasons for your answer to question 19?

Policy H1 cannot be achieved on small brownfield sites so the policy needs to be changed in this respect. It is also not monitored so becomes a pointless policy. It should be amended to apply to large urban extensions and major greenfield sites only. The issue with affordable housing is that RSLs do not want small S.106 sites so this needs to be investigated and resolved as otherwise the policy will prevent the smaller sites i.e. less than 50 units coming forward. National Space standards are strict enough. Private outdoor space standards could prevent urban regeneration/brownfield sites depending on the standard. Look at Luton Council for realistic outdoor space standards. Housing for older people will not come forward unless you allocate it. There is none allocated and none came forward at Houlton, Cawston etc. etc.

Page 10: Wellbeing

Q21

Agree

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

Q22

What are the reasons for your answer to question 21?

Agree, except not possible to provide open space on sites for flats on urban brownfield/regeneration sites.

Page 11: Design

Q23

Agree

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

Q24

What are the reasons for your answer to question 23?

No comment

Page 12: Infrastructure

Q25

Agree

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

Q26

What are the reasons for your answer to question 25?

Agree, however, zero car parking needs to continue to be acceptable within the highly accessible urban areas.

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:

Will email

Page 14: About you

Q28

What is your name?

Ian Gidley

Q29

What organisation are you representing, if applicable?

Land & Planning Consultants Limited

Q30

No

Are you a resident of Rugby Borough?

Q31

Your contact email

igidley@btinternet.com

Q32

Your contact address

42 Main Road, Crick

Q33

Your Postcode

NN6 7TX

Q34

Respondent skipped this question

What is your Gender Identity?

Q35

45-54

Age

Q36

White English

Ethnicity

Q37

No

Do you consider yourself to be disabled?

Q38

Heterosexual/straight

What is your sexual orientation?

Q39

Christian

What is your religion or belief?

#2

COMPLETE

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Page 1: Introduction

Q1 **Neither Agree nor Disagree**

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

Q2

What are the reasons for your answer to question 1?

Objectives 2-6 are perfectly laudable in their aim but in themselves the objectives are pointless unless they are supported by policies which are appropriate and consistent with National Planning Policies. Agreeing or disagreeing with each objective does in no way give support or object to the detailed policies contained in the emerging Local Plan. Objective 1 is asking for a response that supports the Economic Strategy which is a separate question in its own right.

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

Q3 **Neither Agree nor Disagree**

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

Q4

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

The Preferred Options consultation is premature because the document has not taken into account National Planning Policies and Guidance for Plan formulation with respect to the Green Belt. Although the NPPF (December 2024) set out the revised policies for Green Belt including the newly defined Grey Belt, the detailed guidance for applying the policies in the NPPF when looking at amending Green Belt boundaries, is contained in Planning Practice Guidance that post dates the drafting of the Preferred Options Local Plan. Until a robust evidenced base document has been produced which adheres to the approach set out in the PPG, no credibility can be given to the proposed strategy for allocating housing sites as set out in the consultation document because the approach has not applied the guidance set out in the PPG. As it is not possible to retrofit evidence to a strategy that has been produced without applying the relevant approach to amending Green Belt boundaries, the strategy contained in the Preferred Options together with the proposed allocations which require Green Belt boundaries to be amended, can not be deemed robust and should be set aside until the correct procedure has been followed.

This notwithstanding, support can be given to a strategy for housing allocations that seeks to disperse the required number of dwellings rather than relying upon the allocation of large strategic sites. The wisdom of this is based upon the approach set out in the currently adopted Local Plan, where the strategy was reliant upon the delivery of 2 major strategic allocations. Whilst individually both of these strategic sites are now delivering houses and the further delivery of the allocations will be an important part of the future delivery of housing within the Borough, high infrastructure costs and slow delivery dictate that the only feasible means of achieving and maintaining a five year supply of deliverable sites in the new Plan period will be to allocate a larger number of small to medium sites to the rural settlements both within and beyond the Green Belt. Any allocations should respect the existing character and sustainability of each individual settlement and represent organic growth. The Preferred Options Consultation, whilst containing some elements of organic growth, proposed large scale housing release at three settlements that would be disproportionate in terms of scale and impact and could not be seen to be a sustainable dispersal strategy.

Q5

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?

No support can be given to any housing allocation that involves an amendment of existing Green Belt boundaries, until a robust evidence based approach to housing allocations has been undertaken in accordance with National Planning policies and guidance.

Q6

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.

Not relevant until a robust analysis has been undertaken to Green Belt policies and guidance as per the response to questions 4 & 5.

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

Q7

Neither Agree nor Disagree

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

Q8

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

For the same reasons given for housing allocations, until a robust approach to reviewing and amending Green Belt policies has been carried out in accordance with National Planning policies and Guidance, no credence can be given to the proposed strategy for employment land.

Page 4: Gypsy and Traveller sites (policy S4)

Q9

Neither Agree nor Disagree

To what extent do you agree with policy S4?

Q10

What are the reasons for your answer to question 9?

It is unclear whether Policy S4 has been produced in accordance with the National Planning policies and guidance for traveller sites that was published in December 2024. Given the timescales it is unlikely that this would have been possible in which case until the policies and guidance have been correctly applied, no support can be given to Policy S4.

Page 5: Climate

Q11

No Answer

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

Q12

Respondent skipped this question

What are the reasons for your answer to question 11?

Page 6: Economy

Q13

No Answer

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

Neither Agree nor Disagree

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

Q16

What are the reasons for your answer to question 15?

Whilst support can be given to policies aimed at protecting and enhancing the retail and leisure functions of the town centre and district centres in the Borough, the Local Plan Review should be far more flexible and innovative than the currently adopted Local Plan in its approach to retail policy and policies relevant to leisure and community uses. The very significant changes in shopping patterns, especially since COVID, require a much greater flexibility in approach to policy for traditional town, district and neighbourhood hubs. Framing policies that do not reflect the changes in shopping patterns that have occurred and which are highly unlikely to be reversed, will not achieve the objectives and may frustrate new initiatives in places outside of the defined centres and hubs.

Page 8: Environment

Q17

No Answer

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

Q18

What are the reasons for your answer to question 17?

Some of the policies set out under the Environment heading, may well be supportable but none can be looked at in isolation. The subject matter dealt with under each policy should be applied in a balanced and proportionate way when applied to allocated development sites and should be part of an analysis of viability. The imposition of policies in isolation of this balanced approach to development allocations, should be avoided.

Page 9: Housing

Q19

Neither Agree nor Disagree

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

Q20

What are the reasons for your answer to question 19?

Whilst some of the policies are supportable, others such as Policies H3 and H4 are not consistent with National Planning policies or guidance. The preferred Options consultation fails to adhere to the objectives set out in Paragraph 73 of the NPPF. The Borough's brownfield register is not comprehensive and there has been no apparent attempt to identify sites to accord to paragraph 73. As such housing policies that seek to continue an inflexible approach to the delivery of small scale housing sites, cannot be supported.

Page 10: Wellbeing

Q21

Strongly Agree

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

Q22

What are the reasons for your answer to question 21?

In principle support is given to policies that seek to protect and enhance community facilities, especially those identified in Neighbourhood Plans. The policies need to be flexible to support the principle community value of the site but to allow other complimentary uses or initiatives that would demonstrably add to the viability and hence retention of the principle use.

Page 11: Design

Q23

Agree

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

Neither Agree nor Disagree

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

Q26

What are the reasons for your answer to question 25?

Until a robust Local Plan document has been produced that accords to National Planning policies and Guidance and that all evidence based documents that are needed to formulate the Local Plan policies have been completed, it would not be possible to form a view on the infrastructure requirements to deliver the strategy.

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:

The consultation document is unfortunately not fit for purpose since it has not been formulated by applying current National Planning Policies or Guidance nor a full and robust evidence base. Whilst National Planning policies and guidance emerge at times that may not accord to the timescale for Plan formulation, the revised National policies for Green Belt in particular is of such a significant importance to plan formulation in Rugby Borough that should have meant that consultation on the preferred options document should not have been initiated as the scale of changes that are likely to be required to produce a document that is consistent with current National Planning Policies and Guidance, is likely to completely undermine consultation on this document.

Page 14: About you

Q28

What is your name?

[REDACTED]

Q29

What organisation are you representing, if applicable?

[REDACTED]

Q30

Yes

Are you a resident of Rugby Borough?

Q31

Your contact email

[REDACTED]

Q32

Your contact address

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Q33

Your Postcode

[REDACTED]

Q34

What is your Gender Identity?

[REDACTED]

Q35

Age

[REDACTED]

Q36

Ethnicity

[REDACTED]

Q37

Do you consider yourself to be disabled?

[REDACTED]

Q38

[REDACTED]

What is your sexual orientation?

[REDACTED]

[REDACTED]

[REDACTED]
