

FAO Sarah Alexander

Brinklow Parish Council

Development Strategy

Rugby Borough Council

Town Hall

Evreux Way

Rugby

CV21 2RR

11 March 2016

Dear Sarah

Ref: Local Plan Consultation

In response to the consultation on the draft Local Plan put forward by Rugby Borough Council, Brinklow Parish Council would like to make the following observations:

The Parish Council does not agree with the Distribution Strategy in relation to the identification of main rural settlements and the allocation of 100 homes to be developed in Brinklow as a main settlement, in particular:

- The Rural Suitability Study is flawed in that it does not take into account the ability of identified services to cope with the additional pressures of development. The draft proposal of 100 new homes in Brinklow would generate approximately 240 new residents and the study makes no attempt to describe the impact this would have on local services such as school provision, local health services and public transport. The assumption appears to be that services will accommodate such growth. However, there is no evidence to support this within the study or any clarity as to how services will be funded to meet expected growth.
- The proposal to develop 100 new homes in the first 5 year period of the plan represents a 25% increase in both population and settlement size for Brinklow. No logical explanation is given as to why this must be achieved within the first 5 years of the plan and this puts undue pressure on the community to develop a Neighbourhood Plan and develop local services to accommodate growth. Any period for the growth of Brinklow should not be constrained to the first 5 year period of the plan but allowed to evolve for the

entirety of the period covered by the plan. In addition, a 25% growth in settlement size represents a major change in the character of the village and no assessment is made as to the impact this will have on the rural character and nature of the village.

- The Local Plan requires 100 homes to be built in Brinklow as a main settlement. No account has been taken of the availability of building land within the confines of the settlement area to accommodate this number. The expansion of Brinklow as a main settlement should be restricted to the availability of building land within the settlement boundary. The Local Plan should focus on identifying such land and development numbers, rather than imposing an arbitrary number.
- No assessment has been made to quantify the impact of 100 new homes on the transport infrastructure within the settlement of Brinklow and associated area. The ability of the existing road structure to cope with current demand could best be described as chaotic in the morning and evening rush hours. Due to limited public transport links there is high degree of dependency on private motor vehicles and the expected growth in population as a result of development will further put pressure on this system.

In relation to the development of policy under the Local Plan, Brinklow Parish Council would make the following comments:

- The requirement to develop 100 new homes in the main rural settlement of Brinklow will most certainly require the development of green belt land. The Parish Council is opposed to this and supports policy SD1, Settlement Hierarchy which seeks to preserve the countryside and greenbelt. More emphasis should be placed on preserving the rural character of identified main settlements and wishes of the local population expressed through the Neighbourhood Plan. Given that the UK is not self-sufficient in food production, the assumption should always be in favour of retaining farming land for the production of food and employment.
- Policy SD4: Conversions. Provision should be made to prohibit the conversion / loss of agricultural buildings that will lead to increased agricultural vehicle movements or the erecting of new agricultural buildings to allow the development / conversion of existing buildings unless a clear business need can be demonstrated.
- Policy SD6: Parish or Neighbourhood level documents. The policy makes no reference to the Neighbourhood plan and should do so.

- Policy H1: Informing Housing Mix. An additional control should be that non mixed housing should be subject to an impact study to assess the impact on the existing local community. Non mixed housing such as low cost affordable housing may impact on the character of a neighbourhood and the impact should be properly assessed.
- Policy H2: Housing for rural businesses. The policy makes no reference to housing that is developed for agricultural needs and what happens when that need is not required. The policy should make it clear that such developments will be subject to reassessment under planning legislation.

In conclusion Brinklow Parish Council understands the need and supports the development of a Local Plan. The Parish Council is not anti-development, but favours controlled development that takes account of local needs and is sympathetic to the character of the local area.

Unfortunately, the arbitrary figure to develop 100 new homes in the settlement of Brinklow is not sympathetic to the needs of the community and imposes a 25% expansion of this settlement which will negatively impact on both services and greenbelt land. Brinklow Parish Council would like to see the figure of 100 new homes removed from the Local Plan and work begin to assess what can be developed within the confines of the existing settlement area.

Yours Sincerely

David Lowe

Chair of Brinklow Parish Council