



**RUGBY BOROUGH HOUSING  
AND ECONOMIC LAND  
AVAILABILITY ASSESSMENT  
2025**

**CONTENTS**

- 1. Introduction .....4
  - National Guidance .....4
  - Purpose.....4
- 2. Background .....4
- 3. Methodology.....5
  - Figure 1: Flow Chart.....6
- 4. Stage 1: Site / Broad Location Identification .....7
  - Geographical Area .....7
  - Consultation.....7
  - Call for Sites .....7
  - Site Size .....8
  - Broad Locations .....8
  - Figure 2: Potential Broad Locations for Housing Development .....9
  - Figure 3: Potential Broad Locations for Employment Development .....10
  - Desktop Review .....11
    - Table 1: Sources of Data .....11
- 5. Stage 2: Site/broad location assessment .....12
  - Suitability, Availability and Achievability.....12
  - Suitability Assessment .....12
    - Table 2: Site Assessment Considerations .....12
  - Plot Boundaries .....17
  - Availability Assessment .....17
  - Achievability Assessment .....18
- 6. Estimating the Development Potential (Capacity) of Sites .....18
  - Residential Development Potential.....18
  - Net Developable Area (residential) .....18
  - Density (residential).....19
  - Employment Development Potential .....19
  - Deliverability Assessment.....20
  - Deliverable.....20
  - Developable .....20
- 7. Stage 3: Windfall Assessment .....20
- 8. Stage 4: Assessment Review .....21
- 9. Stage 5: Final Evidence Base .....21
  - Number and Nature of Sites Identified .....21

Table 4: Number and Nature of Sites Identified.....	21
Discounted sites – Too small .....	21
Discounted Sites - Extant planning permission, built out, under construction or part of active local plan allocation .....	21
Discounted Sites – Other Reasons.....	22
Remaining Sites .....	22
Appendix 1: HELAA methodology and call for sites proforma.....	23
Appendix 2: Sites discounted for being too small.....	24
Appendix 3: Sites discounted for having extant planning permission, being built out or under construction .....	26
Appendix 4: HELAA proformas .....	29
Appendix 5: HELAA maps by Parish and town area .....	30

# 1. INTRODUCTION

## NATIONAL GUIDANCE

- 1.1. The National Planning Policy Framework (the 'NPPF') under paragraph 69 requires that: "Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment". From this, councils, through their planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- 1.2. The government's online Planning Policy Guidance (the 'PPG') provides further guidance.
- 1.3. The PPG states that an assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period and stresses that it is an important source of evidence to inform plan-making and decision-taking, and the identification of a 5-year supply of housing land.

## PURPOSE

- 1.4. National guidance makes clear that **the assessment does not in itself determine whether a site should be allocated for development**. It is the role of the assessment to provide information on the range of sites which are available to meet the council's requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements.
- 1.5. A separate process carried out as part of the Borough's development plan review will determine which sites should be identified for residential and employment development. **Thus, policy decisions relate to the development plan, not the HELAA.**
- 1.6. Therefore, the purpose of the HELAA is to provide evidence on the availability of sites for housing and employment within the plan area - **it is a technical report - not a decision-making document and does not allocate land for any use**. In line with government guidance, it will identify a pool of potential housing and employment land.

# 2. BACKGROUND

- 2.1. In developing the HELAA, Rugby Borough Council have worked closely with neighbouring authorities in the Coventry and Warwickshire area, to ensure consistency across assessments. This is important as there are relationships relating to housing and the economy which stretch across administrative boundaries.
- 2.2. In line with the recommendations of the Planning Practice Guidance (PPG) (Paragraph 007 Reference 3-007-20190722) a high-level methodology for undertaking Housing and Employment Assessments was agreed between the councils that make up the Coventry and Warwickshire Housing Market Area (the HMA) and the Functional Economic Market Area (FEMA). The councils involved, and signed up to the methodology are:

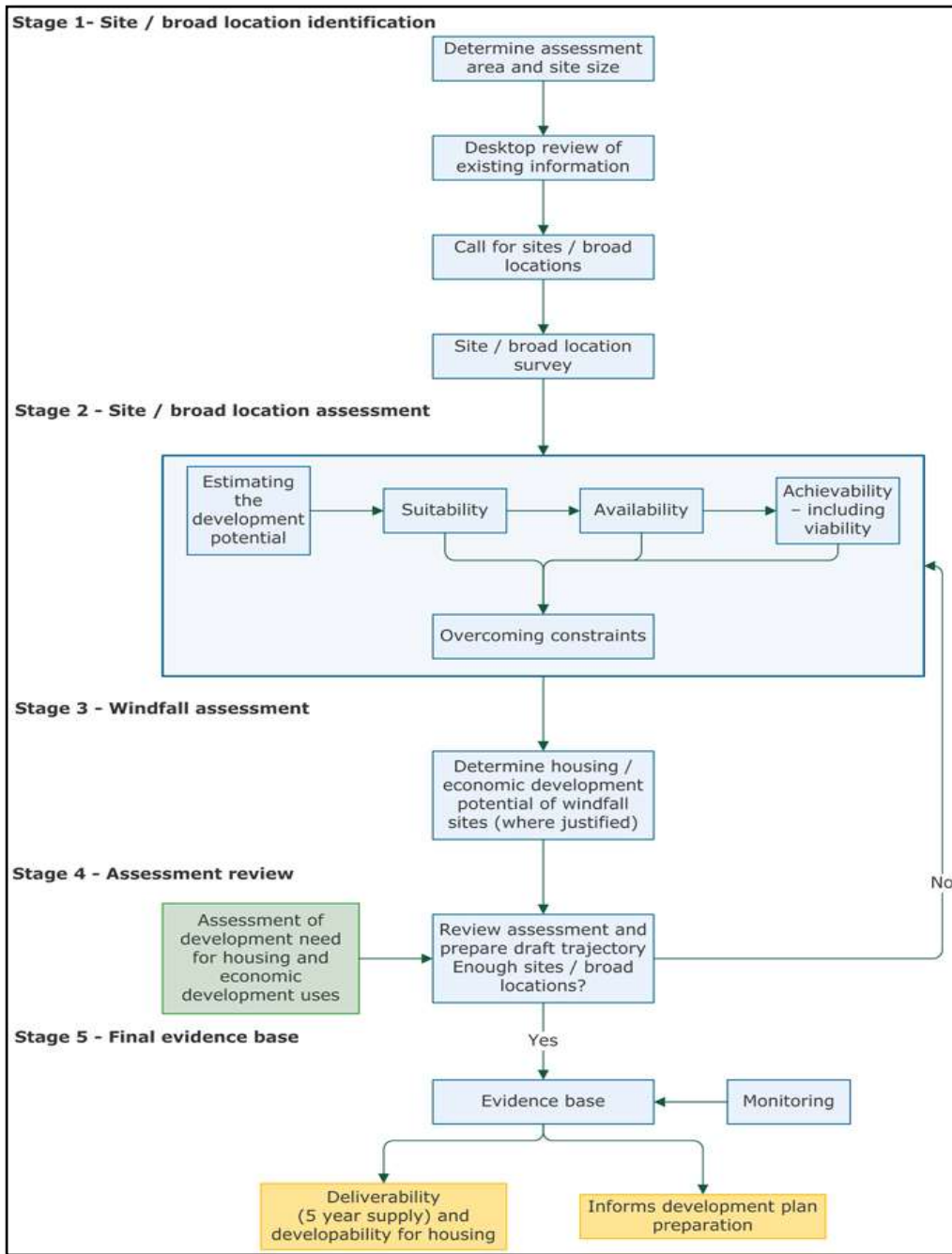
- Rugby Borough Council
- Nuneaton and Bedworth Borough Council
- Coventry City Council
- Warwick District Council
- Stratford on Avon District Council
- North Warwickshire Borough Council

- 2.3. A Coventry and Warwickshire Sub-Regional Joint Method Statement was produced in February 2022 entitled the 'Housing and Economic Land Availability Assessment – Methodology' and adopted by each council. This established a common methodology for each council to largely follow with broad principles to inform each council's individual assessments. A copy of the Sub-regional joint methodology and Call for Sites proforma can be found in **Appendix 1**.
- 2.4. Rugby Borough Council's own methodology follows the parameters of the Coventry and Warwickshire Sub-Regional Joint Method Statement which seeks to front load the identification of issues and constraints as far as possible using the Call for Sites Proforma and then provides flexibility for each authority to determine how to assess sites and determine what limitations may result in discounting individual sites.
- 2.5. As detailed below, a number of constraints have been considered and these may differ for other authorities within the sub-region, depending on circumstances.

## 3. METHODOLOGY

- 3.1. The overall methodology follows the approach as reflected by the diagram below, which is taken from the PPG and reproduced in the Sub-Regional Joint Method Statement.

Figure 1: Flow Chart



(Source: PPG)

3.2. The following sections detail the approach that has been undertaken during each step of the methodology.

# 4. STAGE 1: SITE / BROAD LOCATION IDENTIFICATION

## GEOGRAPHICAL AREA

- 4.1. The PPG establishes that the geographical extent of site selection and assessment should be the plan-making area. The HELAA therefore covers the administrative area of Rugby Borough.

## CONSULTATION

- 4.2. The PPG also states that a range of stakeholders should be involved in plan preparation which includes the evidence base in relation to land availability assessments. The council undertook its Regulation 18 Issues and Options consultation from 30 October 2023 to 2 February 2024. As part of the consultation the council hosted drop-in information sessions for interested residents along with separate sessions for key stakeholders including parish councils. The consultation provided an opportunity for statutory bodies, stakeholders or interested parties to comment. In addition, the council has specifically targeted consultees for their comments on each individual site assessed through the HELAA. This process assisted the council in the high-level site assessments.
- 4.3. In order to identify sites for assessment, running in tandem with the Issues and Options consultation, the council launched a 'Call for Sites' exercise as detailed below.

## CALL FOR SITES

- 4.4. The call for sites exercise invited sites to be submitted. Further sites were identified by desktop review. The exercise ran alongside the Issues and Options consultation and closed during April 2024 which allowed for some sites that were submitted outside the Issues and Options process to be included.
- 4.5. The proforma that was based on the Sub-Regional Joint Method Statement was provided to third parties to submit sites. This sought to establish as much information as possible, including details on the site location, suggested potential type of development, scale of development and known constraints. This also allowed submissions to establish any mitigations possible to overcome identified constraints. This was to 'front-load' site assessment as far as possible and assist in the overall process.

## **SITE SIZE**

- 4.6. The PPG states that plan makers need to assess a range of different site sizes from small-scale sites to opportunities for large scale developments. It suggests that sites of a smaller size than 0.25 ha/500 sqm of economic development, or with a capacity fewer than 5 dwellings, should not be considered as part of the process and this is echoed within the sub-regional joint methodology. Therefore, residential sites smaller than 2500m<sup>2</sup> (0.25 ha) or below the threshold of five dwellings, and for economic development smaller than 500m<sup>2</sup> (0.05ha) were discounted in the initial assessment. Discounting such sites does not mean that they are not suitable for development – they may still provide reasonable small-scale opportunities in the future.

## **BROAD LOCATIONS**

- 4.7. The PPG sets out that plan-makers need to be proactive in identifying as wide a range of sites and broad locations for development as possible. Identified sites, which have particular constraints (such as Green Belt), need to be included in the assessment for the sake of comprehensiveness. An important part of the desktop review, however, was to identify sites and their constraints, rather than simply to rule out sites outright which are known to have constraints.
- 4.8. Part of the Issues and Options Consultation suggested some broad locations in which housing and employment could be built, based on sites that were put forward in the last plan and a high-level consideration of constraints and designations. Figures 2 and 3 below illustrate these broad locations, however, the council also requested other locations to be submitted as part of the process.



**Figure 2: Potential Broad Locations for Housing Development**



*Potential housing locations*

Figure 3: Potential Broad Locations for Employment Development



Potential strategic employment locations

## DESKTOP REVIEW

- 4.9. The PPG states that it is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through a desktop review process that may assist in meeting the development needs of an area. The council has therefore undertaken a high-level desktop review for site identification alongside the Call for Sites exercise and replotted and redrawn sites where a more suitable site boundary is deemed appropriate to assess.
- 4.10. The PPG provides guidance on the sources of data which can be used to identify potential sites through the assessment. Table 1 outlines the sources of data that have been utilised by the council as part of the desktop review.

**Table 1: Sources of Data**

Type of site	Data source
Existing housing and economic development allocations	Borough Local Plan Planning application records
Planning applications that have lapsed	Planning application records
Additional opportunities for un-established uses (e.g. making productive use of under-utilised facilities such as garage blocks)	Local authority records Planning applications Officer knowledge Brownfield Register
Land in the local authority's ownership	Local authority records
Rugby town centre sites	Officer knowledge Rugby Regeneration Strategy

- 4.11. There are other sources outlined within the PPG that can be utilised during a desktop review, e.g. sites adjoining villages and potential urban extensions. However, it was considered that these sites will have been promoted through the Call for Sites process.
- 4.12. Where sites already have planning permission and have been identified as being built out or under construction or are still within the time frame for implementation and have realistic prospect of being constructed, they have been discounted from the process. Sites where planning permission has lapsed have been assessed as they may present an opportunity in the future. Sites granted approval prior to 2021 with no subsequent activity to discharge conditions have also been considered as they may lapse imminently.
- 4.13. The data is collected from a wide range of sources including local planning authorities' records, the local plan, other information held by the authority and Ordnance Survey mapping and data. Each site identified has been individually mapped and assigned a unique reference number.

# 5. STAGE 2: SITE/BROAD LOCATION ASSESSMENT

## SUITABILITY, AVAILABILITY AND ACHIEVABILITY

5.1. To enable a preliminary judgement to be made about whether a site or broad location can be considered deliverable or developable, its suitability, availability and achievability was assessed via a desk-based assessment.

## SUITABILITY ASSESSMENT

5.2. The PPG provides further guidance in relation to assessing the suitability of sites/broad locations for development within land availability assessments. A site or broad location can be considered suitable if it would provide an appropriate location for development, when considered against relevant constraints and their potential to be mitigated. The PPG states that when considering constraints the information collected as part of the initial site survey, as well as other relevant information including those listed below, should be considered:

- National and local policy designations.
- Appropriateness and likely market desirability of potential development.
- Contribution towards regeneration areas and priorities.
- Potential impacts on landscape, natural and heritage designations.

5.3. Each site has been assessed to identify its overall ‘suitability’ for new housing or employment development based on the information gathered to date. This information includes technical evidence (as detailed below) together with planning history and information submitted by the site promoters.

5.4. Table 2 below outlines how different criteria and considerations have been assessed and what sources have been used:

**Table 2: Site Assessment Considerations**

<b>Constraint</b>	<b>Assessment</b>	<b>Source</b>
<b>Green Belt</b> - sites located within the designated Green Belt	Sites within the Green Belt have not been discounted at this stage. Green Belt boundaries can only be altered through the Local Plan where exceptional circumstances are fully evidenced and justified.	• QGIS mapping – <i>Green Belt data-set</i>
<b>Protected Ecological / Wildlife / Geological Sites</b> - sites located within or in close proximity to important priority habitats, wildlife, ecological or geological	The presence of a protected habitat does not always prevent development, but an initial high level assessment has been made where it is deemed that	• QGIS mapping - <i>Local Nature Reserves (LNR), Sites of Special Scientific Interest (SSSI) and SSSI Impact Risk Zones, Geological Sites, Local Wildlife Sites, Priority</i>

Constraint	Assessment	Source
habitats.	development could cause harm to conservation interests. No HELAA sites are impacted by geological sites.	<i>Habitats, Phase 1 habitat survey Inventory data-sets</i> • Ecological / Specialist Appraisals and surveys received from landowners / promoters
<b>Trees / Hedgerows / Woodlands</b> – sites that would impact on a designated Ancient Woodland or Tree Preservation Order	Development should be steered away from areas of ancient or protected woodland, and an assessment has been made depending on the extent of the impact. Where site characteristics and careful design could mitigate impact and future development could be suitable an assessment have been made where it is judged that development could be suitable.	• QGIS mapping – <i>Tree Preservation Order (TPO) &amp; Ancient Woodlands data-sets</i>
<b>Flood Risk (Fluvial)</b> - sites located within Flood Zones 2 or 3 or Source Protection Zones (around boreholes) protecting water quality within protection area SPZ 1 – wouldn't allow any surface water drainage no non-mains drainage – needs flagging.	Development should be steered towards areas at lower risk of flooding. The amount of land impacted by medium or high flood risk has been calculated and consideration given as to whether the remaining area is developable and, if so, the site's capacity has been adjusted accordingly. The Vulnerability of uses has also been taken into account. If a site has been assessed as unsuitable due to flood risk the sequential, and if necessary, exception test, would need to be considered. This would only happen if, taking into account sustainable development objectives, there are not sites at lower risk of flooding available to accommodate identified development needs. There are no source protection zones in Rugby Borough.	• National flood mapping data-sets • QGIS mapping – <i>SFRA, Historic Flooding, Canal Consultation Zone data-sets</i> • Consultation with Lead Local Flood Authority (LLFA) • Information submitted to the call for sites exercise
<b>Flood Risk (Pluvial)</b> - sites that are subject to high surface water flooding risk.	Development should be steered towards areas at lower risk of flooding. The amount of land impacted by surface water flood risk has been calculated and	• National flood mapping data-sets • QGIS mapping - <i>SFRA data-sets</i>



Constraint	Assessment	Source
	<p>consideration given as to whether the remaining area is developable and, if so, the site's capacity has been adjusted accordingly. Consideration to the vulnerability of uses has also been taken into account. If a site has been assessed as unsuitable due to surface water flood risk the sequential test and, if necessary, exception test would need to be passed to make it acceptable.</p>	<ul style="list-style-type: none"> <li>• Consultation with Lead Local Flood Authority (LLFA) (if required)</li> <li>• Information submitted to the Call for Sites Exercise</li> </ul>
<p><b>Heritage Assets</b> - sites that contain or are within the setting of a Listed Building, Scheduled Ancient Monument, Conservation Area or Registered Park and Garden or Archaeological interest.</p>	<p>The presence of a heritage asset does not always prevent development, but the type and nature of the constraint have been evaluated at a high level and the sites assessed in relation to potential impact of any future development on heritage assets. Warwickshire County Council has declined to allow access to GIS mapping of archaeological records and so the potential presence of archaeological assets has not been assessed.</p>	<ul style="list-style-type: none"> <li>• National data-sets</li> <li>• QGIS mapping –<i>Listed Buildings, Historic Parks and Gardens, Scheduled Ancient Monument (SAM) data-sets</i></li> <li>• Heritage Impact Assessments provided by Landowners / Promoters</li> </ul>
<p><b>Major Infrastructure</b> –sites that are constrained by major infrastructure such as gas, slurry or cement pipelines and / or electricity towers or pylons.</p>	<p>The sites impacted by infrastructure constraints have been assessed in relation to whether master planning and design could overcome the issues.</p>	<ul style="list-style-type: none"> <li>• National Utility Mapping Data-sets</li> <li>• QGIS Mapping – <i>Cement / Slurry Pipeline, HSE Site consultation zones, National Gas, Electricity, Overhead Line, Towers data-sets</i></li> </ul>
<p><b>Infrastructure Capacity</b> – sites that could impact on the capacity of existing infrastructure (highways, health, sewerage, water supply, education, gas and electricity)</p>	<p>Sites have been assessed to determine if they would have a detrimental impact on existing infrastructure capacity issues or conflict with the strategic ambitions of infrastructure providers and, where identified, if new infrastructure provision could make a site acceptable for development. At the HELAA stage this has been a high-level</p>	<ul style="list-style-type: none"> <li>• Consultation with NHS organisations, Warwickshire County Council, National Highways, Severn Trent Water</li> <li>• Water Cycle Study</li> <li>• Issues and Options Representations</li> </ul>

Constraint	Assessment	Source
	assessment focussing on known area-wide issues and does not consider site specific mitigation.	
<b>Minerals and Waste</b> - sites allocated for or safeguarded for minerals extraction or waste management in the Minerals and Waste Local Plan.	The sites have been assessed in relation to any areas impacted by minerals and / or waste management. In accordance with local and national policy, a further detailed assessment will be required to assess the resources on the site and any potential impacts and mitigation measures required.	<ul style="list-style-type: none"> <li>• Minerals and Waste GIS mapping layers</li> <li>• Information submitted through the Call for Sites exercise</li> </ul>
<b>Access Issues / Known Highways Capacity Issues</b> - sites where no safe vehicle access can be gained.	The sites have been assessed against any available evidence or reasonable likelihood that a solution to the access constraints could be achieved, or highways solutions can mitigate known highways issues, to determine if it would be potentially suitable for development.	<ul style="list-style-type: none"> <li>• Information submitted to the Call for Sites Exercise</li> <li>• QGIS Mapping – <i>Road Classifications data-set</i></li> <li>• Consultation with National Highways</li> <li>• Warwickshire County Council declined to comment on access arrangements to all sites due to resource constraints.</li> </ul>
<b>Legal Issues</b> – sites constrained by a ransom strip, a covenant or other legal issue	The sites have been assessed against any evidence or reasonable likelihood that a solution to the legal issue could be achieved.	<ul style="list-style-type: none"> <li>• Information submitted to the Call for Sites Exercise</li> </ul>
<b>Settlement character</b> – sites that are poorly related to the existing settlement and/or of disproportionate scale to the settlement. Where possible, smaller cuts have been taken of larger sites.	Sites have been assessed to determine whether they have an impact on the identity/morphology of a settlement and that they can integrate well with an existing settlement. Consideration has been given to ascertain if sensitive master planning and design could overcome site constraints in relation to settlement identity.	<ul style="list-style-type: none"> <li>• Officer Judgement</li> <li>• QGIS Mapping – <i>settlement boundary, urban edge data-sets</i></li> </ul>
<b>Sustainability</b> – sites that are not well related to an existing settlement, removed from existing services or facilities or within the open countryside (for	Sites that are clustered together that cumulatively could form a new sustainable location through infrastructure provision could be deemed suitable for	<ul style="list-style-type: none"> <li>• QGIS Mapping – <i>settlement boundary, urban edge, local plan, planning application data-sets</i></li> </ul>

Constraint	Assessment	Source
residential). For employment sites that are remote from existing employment sites and/or poorly accessible to the strategic road network.	development. Additionally, sites for employment purposes do not require the same level of sustainability considerations as residential sites. A judgement has been taken in both cases in their assessment.	<ul style="list-style-type: none"> <li>• Distance to existing services and facilities including public transport provision</li> <li>• Officer judgement</li> <li>• Information submitted to the call for sites exercise</li> <li>• Sustainable transport considerations informed by county council input</li> </ul>
<b>Agricultural Land Quality</b> – sites that are deemed to be high quality land (Grades 1 or 2).	The quantum and grade of agricultural land that would be lost.	<ul style="list-style-type: none"> <li>• QGIS Mapping – <i>Agricultural Land Classification data-set</i></li> <li>• Information submitted to the call for sites exercise</li> </ul>
<b>Contamination / Pollution Issues</b> – sites impacted by known contamination or pollution issues. EA regulated sites (waste / active landfill), COMAH sites.	Contamination and pollution is often related to the previous use of a site and indicates that further assessment is needed. The sites have been assessed in relation to any available evidence / remedial measures available that would allow the site to be considered suitable for development.	<ul style="list-style-type: none"> <li>• QGIS Mapping - <i>Smoke Control Areas, Air Quality data-sets, Historic / Active Landfill data, COMAH sites data-sets</i></li> </ul>
<b>Designated Open Space</b> – sites that are designated open spaces within the Local Plan.	The sites have been assessed in relation to any available detailed evidence that would demonstrate that the site is surplus to requirements or no longer serving its useful purpose to be considered suitable for development.	<ul style="list-style-type: none"> <li>• QGIS Mapping – <i>designated open space data-set</i></li> <li>• Information submitted to the call for sites exercise</li> </ul>
<b>Topography</b> – sites constrained by sloping land or contrived shape / form	The sites have been assessed in relation to whether master planning and design could overcome topography / landform constraints to be considered suitable for development.	<ul style="list-style-type: none"> <li>• Officer judgment / site visits</li> </ul>
<b>Designated Land</b> - sites designated for other uses within the local plan	Sites have been assessed against any available evidence that would support redesignation through the local plan process to be considered for an alternative use.	<ul style="list-style-type: none"> <li>• QGIS Mapping – <i>Local Plan, Planning application data-sets</i></li> </ul>



## PLOT BOUNDARIES

- 5.5. Following the suitability assessment, it was considered appropriate to redraw some of the site boundaries submitted to remove areas of constraint from any further assessment – these smaller sites were given separate reference numbers and further assessed accordingly. In addition, in some cases it was appropriate for sites submitted of a large scale where their size might have a potential negative impact on the character of a settlement to be redrawn with a smaller land take to enable a reduced size option to be considered
- 5.6. As part of the process officers also analysed clusters of sites to determine if there was any merit in amalgamation of these land parcels to form a potential strategic option for residential and/or employment uses. Larger scale residential options were considered where they were of a scale that could potentially assist a settlement with new infrastructure provision. Large scale employment options were considered where they were of a scale that could potentially assist with meeting the strategic employment needs of the Borough.

## AVAILABILITY ASSESSMENT

- 5.7. The HELAA assesses all sites based on their availability for residential and/or employment development. The availability assessment is concerned with whether a site is free from legal or land ownership constraints and how advanced it is in terms of site promotion, i.e. whether it is owned or under option to a housing or employment developer or whether the site is being promoted by the landowner(s).
- 5.8. The assessment of availability has been informed through submissions to the process via the call for sites exercise. The availability of a site has been established by looking at the current use of a site, the intentions of the landowner and any outstanding legal issues or ownership issues (e.g. multiple ownerships or ransom strips). A site has been considered available where, based on the information available, there are no reasons that should prevent the development coming forward.
- 5.9. Some assumptions were made on sites to ensure a realistic timeframe was identified that included the following:
- if a site is subject to an outline planning application and no decision is yet to be made it was assumed that the site would reasonably be available in 6 – 10 years (on allocated sites).
  - If a site is subject to an outline or reserved matters planning application that has been approved, it was assumed that the site would reasonably be available within 5 years.
  - If limited information was submitted by a landowner or developer but is being promoted it was assumed that the site would reasonably be available in 6 - 10 years.
  - If a site is subject to sitting tenants it was assumed that the site would be available within 11 – 15 years to allow full consultation and site assembly etc. to take place.
- 5.10. The information provided within the Rugby Regeneration Strategy (November 2022) was used

to determine the availability of sites within the town centre where no other information was submitted.

## **ACHIEVABILITY ASSESSMENT**

- 5.11. In accordance with the PPG, a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of development on a site, and the capacity of the developer to complete and let or sell the development over a certain period.
- 5.12. An assessment has been made, based on the available evidence, of whether there are difficulties or constraints that exist which may affect the viability of a proposed site, and where these exist whether they are likely to affect the achievability of development on a site. However, the appraisal of a site's viability for development is a detailed process and is carried out at the pre planning application stage. Therefore, unless the council has specific site information which suggests a site may incur abnormal costs or is within a locality experiencing unusually poor market conditions, it is assumed that sites submitted to the process are viable for development and therefore achievable.
- 5.13. If a site was assessed as unsuitable during the process, the achievability of a site was not normally further determined, depending on how far the assessment of a site had already progressed.

## **6. ESTIMATING THE DEVELOPMENT POTENTIAL (CAPACITY) OF SITES**

### **RESIDENTIAL DEVELOPMENT POTENTIAL**

- 6.1. In relation to development potential, the PPG states that the estimation of the development potential for each site can be guided by the existing or emerging planning policy whilst, in the context of the NPPF, seeking to make the most efficient use of land.
- 6.2. To understand how many dwellings could be expected to be provided, it has been necessary to estimate the net developable area of each site. To achieve this the overall site area (in hectares) was measured, then land requirement for the provision of other uses, infrastructure, services and individual site constraints was deducted from the total site area. Once the net developable area was known, housing density could be applied to estimate how many dwellings could be provided on a particular size of site - density assumptions were applied to the net developable area.

### **NET DEVELOPABLE AREA (RESIDENTIAL)**

- 6.3. For greenfield sites in calculating the net developable area ratios of 60% of the total site area for larger sites (more than 10 ha), 75% of the site for smaller sites (less than 10 ha) and 100%

on sites of less than 1ha. These ratios were used where no information was submitted to indicate the area of the site which is to be developed. These were derived by benchmarking against other comparable councils that have produced HELAAs. Where call for sites submissions have provided site specific information on net developable area, this was analysed. If the site is affected by constraints which render part of it undevelopable, for example areas of high pluvial and fluvial flood risk, TPOs, Ancient Woodland, Priority Habitat, additional infrastructure restrictions, local wildlife sites, designated open space, Scheduled Ancient Monuments, listed buildings etc these were further deducted to inform the net developable area. The 'calculated net site area' was used in the HELAA results tables, rather than the submitted gross site area.

## DENSITY (RESIDENTIAL)

- 6.4. The site density assumptions which were used within the HELAA are as follows:
- where information has been provided on development potential, from the Call for Sites exercise, this has been considered and used as the density where it is assessed as appropriate and realistic;
  - where capacities are informed by a planning application, this figure has been used for the assessment where it is considered reasonable when assessed against the density calculation;
  - In cases where a figure is not provided, assumptions have been applied (as set out below) to provide an indication of the potential development capacity of a site.
- 6.5. The following density assumptions have been applied to each site:
- Rural areas, edge of settlements = 35 dwellings per net developable hectare;
  - Urban areas (town centre) that can accommodate apartments = 100 dwellings per net developable hectare;
  - Urban areas that cannot accommodate apartments = 75 dwellings per net developable hectare.
- 6.6. Where possible, known constraints were taken into account when estimating the capacity of a site and it was important to recognise that capacities may also be affected by issues not evident at the time a site assessment is undertaken. Therefore, the potential capacity of a site derived through the HELAA may change through any subsequent planning process. However, the HELAA has taken a cautious approach to avoid over-estimation of land capacity.

## EMPLOYMENT DEVELOPMENT POTENTIAL

- 6.7. For economic development a potential land area was included to identify capacity. Where a site promoter has provided a capacity figure this has been used.
- 6.8. For other sites, it has been assumed that the total area of land submitted would not be developed because a proportion would be required for infrastructure provision to provide for on-site requirements for e.g. access, landscaping and drainage. Taking this into account it is considered that the floor area developed will equate to 40% of the gross site area (this is a plot ratio of 0.4). This reduces to 35% for sites of 25ha or more in area. These figures were used unless further detailed information relating to the site had been submitted to the council from the landowner / promoter.

## DELIVERABILITY ASSESSMENT

- 6.9. Having assessed all sites for suitability, availability and achievability, and having estimated the potential capacity of each site, the HELAA then concludes on the overall deliverability of sites.
- 6.10. The assessment of when a site may come forward was based on the local knowledge of officers, insight from the development industry and information submitted by landowners / promoters. Therefore, the HELAA gives an estimate of potential delivery timeframes.
- 6.11. The NPPF suggests that councils should, through their evidence studies, gain a clear understanding of sites that are considered to be either deliverable (1-5 years) or developable (6-10 or 11-15 years) within a certain timeframe. These terms are defined in the NPPF glossary:

## DELIVERABLE

- 6.12. To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing could be delivered on the site within five years. In particular:
- sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
  - where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

## DEVELOPABLE

- 6.13. To be considered developable, sites should be in a suitable location for housing or employment development with a reasonable prospect that they have been available and could be viably developed at the point envisaged.
- 6.14. Landowners / Promoters were asked to identify at what point a site would become available and unless the council have information to the contrary these timeframes have been used to determine a sites deliverability / developability.

## 7. STAGE 3: WINDFALL ASSESSMENT

- 7.1. Windfall sites are defined in the NPPF as sites not specifically identified in the development plan. It is necessary to take account of potential windfall sites as this is required in order to produce a housing trajectory. Rugby Borough Council has historically applied a windfall rate for sites of fewer than five residential dwellings. This is outlined through the annual five year housing land supply statements. A windfall assumption has historically not been applied to larger sites.
- 7.2. Windfall sites for 4 or fewer dwellings would generally be too small for inclusion within the HELAA. Therefore, no assessment of windfall has been undertaken as part of this report.

## 8. STAGE 4: ASSESSMENT REVIEW

- 8.1. Following the completion of the site assessment stages, the HELAA findings will be used to determine if there are sufficient sites within the borough to meet the development needs. The results are also one of the factors that would indicate whether a release of Green Belt land is necessary to meet these needs or if a sequential test will need to be passed for areas within medium or high-risk flood zones, however considerations of sustainable development will also be relevant to these issues.
- 8.2. If the findings indicate a shortfall in development capacity, the PPG suggests the results should be revisited with consideration of some of the assessment assumptions on development potential. At this stage it may also be necessary to undertake a further call for sites, utilise other sources to find further sites for assessment or to enter into discussions with neighbouring authorities under the duty to cooperate.

## 9. STAGE 5: FINAL EVIDENCE BASE

### NUMBER AND NATURE OF SITES IDENTIFIED

**Table 4: Number and Nature of Sites Identified**

<b>Data source</b>	<b>Number of sites identified<sup>1</sup></b>
Public "Call for Sites" exercise	157
Council search (sites identified by officers and others)	24
Sites that have been subject to a planning application that has not yet expired	64
Sites that have been subject to a planning application that have lapsed	5
Sites on the council's Brownfield Land Register	11
<b>TOTAL</b>	<b>261</b>

### DISCOUNTED SITES – TOO SMALL

- 9.1. A total of 27 sites were discounted as they were too small to be considered through the HELAA process. All of the sites identified as too small were put forward for residential use. Where within settlement boundaries, these sites could potentially form windfall sites. These sites are listed in Appendix 2.

### DISCOUNTED SITES - EXTANT PLANNING PERMISSION, BUILT OUT, UNDER CONSTRUCTION OR PART OF ACTIVE LOCAL PLAN ALLOCATION

- 9.2. Appendix 3 details 51 sites that have been discounted as they have extant planning permission

<sup>1</sup> To calculate the approximate totals in this table, sites are counted only once, although a site may fit into more than one category. For example, sites subject to a NDP allocation may have also been subject to a planning application but are included in the "extant planning permission" category only.

(for either employment or residential) that has not yet expired, are under construction or have been built out. These sites will be picked up in the annual five-year housing land supply statement published by the council.

## DISCOUNTED SITES – OTHER REASONS

9.3. There were 5 duplicate sites submitted that were discounted to avoid double counting.

9.4. 5 sites that were submitted for ‘other’ uses were discounted as they were considered to fall outside the scope of the HELAA. They comprise the following:

Site Reference Number	Site Name	Proposed Use	Calculated net site area (ha)
48	Former PFS and land adjacent to A45	Other (renewed roadside use)	1.23
110	Land south of Coal Pit Lane, Willey (road-side uses)	Other (roadside uses)	4.12
123	Land east of Popehill Lane (Sports Provision)	Other (Sports Provision)	8.16
288	Proposed Solar Farm, North of Coal Pit Lane	Other (Solar Farm)	21.67
303	Moto Rugby Motorway Service Area, M6 Junction 1, Leicester Road, Rugby	Other (solar farm & HGV parking)	11.82

## REMAINING SITES

9.5. Appendix 4 provides HELAA proformas for the 169 remaining sites. Appendix 5 provides maps of these sites by settlement. These sites are either discounted because they are not suitable, available or achievable or are retained in the assessment as suitable or potentially suitable sites. 20 sites were assessed to be suitable and 112 sites were assessed to be potentially suitable.

9.6. Potentially suitable sites are those that cannot be developed without changes to current planning policies. This includes Green Belt sites.

9.7. At this stage there remain a large number of potentially suitable sites that required further assessment as to their suitability and this will form stage two of the site selection process.

# APPENDIX 1: HELAA METHODOLOGY AND CALL FOR SITES PROFORMA

The methodology and Call for Sites Proforma can be found here:

[https://www.rugby.gov.uk/documents/20124/6836086/Housing\\_and\\_Economic\\_Land\\_Availability\\_Assessment\\_HELAA\\_Methodology\\_February\\_2022\\_.pdf/ccdf1d72-2c52-a57d-b411-a99347463540?t=1702375013903](https://www.rugby.gov.uk/documents/20124/6836086/Housing_and_Economic_Land_Availability_Assessment_HELAA_Methodology_February_2022_.pdf/ccdf1d72-2c52-a57d-b411-a99347463540?t=1702375013903)

## APPENDIX 2: SITES DISCOUNTED FOR BEING TOO SMALL

siteref	sitename	gross_area_ha	parish	ward
1	426 London Rd, Stretton on Dunsmore	0.15	Stretton-on-Dunsmore	Dunsmore Ward
12	The Crescent, Lawford Heath Lane, Rugby	0.23	Long Lawford	Wolston and the Lawfords Ward
99	Land South of Coventry Road (west of Halfway Lane), Dunchurch	0.02	Dunchurch	Dunsmore Ward
154	North Street Car Park, Rugby	0.18	Unparished	Benn Ward
203	PP - 11-12 Sheep Street	0.01	Unparished	Eastlands Ward
205	PP - 16-20 Lawford Road	0.03	Unparished	New Bilton Ward
206	PP - 241 Sedlescombe Park	0.15	Unparished	Rokeby and Overlade Ward
207	PP - 32 High Street	0.1	Unparished	Eastlands Ward
208	PP - 49 Midas Lounge, Church Street	0.02	Unparished	Eastlands Ward
209	PP - 5, 5b and 6 Market Place	0.09	Unparished	Eastlands Ward
210	PP - 7 & 8 , St Matthews Street	0.04	Unparished	Eastlands Ward
211	PP - 76 Buchanan Road	0.07	Unparished	Rokeby and Overlade Ward
214	PP - Brotherhood House, Gas Street	0.06	Unparished	Benn Ward
221	PP - Diamond House Hotel, 28 Hillmorton Road, Rugby, CV22 5AA	0.13	Unparished	Eastlands Ward
224	PP - First Floor 7-8 Church Street, Rugby, CV21 3PH	0.09	Unparished	Benn Ward
250	PP - Land to read of 321-327 Hillmorton Road, Rugby, CV22 5EZ	0.05	Unparished	Paddock Ward
251	PP - Land to rear of 321 Hillmorton Road, Rugby.	0.13	Unparished	Paddock Ward
258	PP - Rosewood House, 42-44 Rosewood Avenue, Rugby, CV22 5PL	0.07	Unparished	Rokeby and Overlade Ward
263	PP - Yum Yum World Ltd, 4 High Street, Rugby, CV21 3BG	0.13	Unparished	Eastlands Ward
272	LPP - Finchley Court, 41 King Edward Road, Rugby, CV21 2TG	0.06	Unparished	Benn Ward
273	LPP - 5 & 6 Royal George Buildings, Market Place 69 & 70 Church Street, Rugby, CV21 3PT	0.07	Unparished	Eastlands Ward



274	LPP - Land rear of the Cooperative Store, 36-38 Overslade Lane, Rugby, CV22 6DY	0.08	Unparished	Rokeby and Overslade Ward
277	LPP - Barn Farm, Bow Lane, Withybrook, CV7 9LQ	0.09	Withybrook	Revel and Binley Woods Ward
284	Former Doctors Surgery, Brownsover	0.04	Unparished	Newbold and Brownsover Ward
290	BF Register - 42 - 54 Winfield Street, Rugby	0.15	Unparished	Eastlands Ward
294	BF Register - Land Adjacent to 9 Railway Terrace, Rugby	0.12	Unparished	Benn Ward
299	BF Register - Former school of Dancing, Jubilee Street, Rugby	0.1	Unparished	New Bilton Ward

# APPENDIX 3: SITES DISCOUNTED FOR HAVING EXTANT PLANNING PERMISSION, BEING BUILT OUT OR UNDER CONSTRUCTION

siteref	sitename	gross_area_ ha	parish	ward
204	PP - 15 Bilton Lane	0.46	Dunchurch	Dunsmore Ward
212	PP - Biart Place, Rugby	1.36	Unparished	Eastlands Ward
213	PP - Brinklow Marina, Cathiron Lane	8.49	Harborough Magna, King's Newnham	Revel and Binley Woods Ward, Wolston and the Lawfords Ward
215	PP - Cawston House, Thurlaston Drive, Cawston	0.31	Dunchurch	Dunsmore Ward
216	PP - Cawston Spinney (Tritax Symmetry) (parcel 12, plot T2)	13.14	Cawston, Dunchurch	Admirals and Cawston Ward, Dunsmore Ward
218	PP - Coventry Road (L&Q Estates) (parcel 6, plot L&Q1)	13.72	Cawston, Dunchurch	Admirals and Cawston Ward, Dunsmore Ward
217	PP - Coton Park East (South site-Persimmon)	8.19	Newton and Biggin, Unparished	Clifton, Newton and Churchover Ward, Coton and Boughton Ward
219	PP - Coventry Road/Pipers End, Wolvey	0.61	Wolvey	Wolvey and Shilton Ward
220	PP - Development Land at Pailton Radio Station, Montilo Lane, Pailton, CV23 0HD	0.96	Pailton	Revel and Binley Woods Ward
222	PP - Dipbar Fields, Dunchurch (Morris Homes)	3.1	Dunchurch	Dunsmore Ward
223	PP - Elms Farm, Oxford Road, Marton, CV23 9RQ	0.67	Frankton	Dunsmore Ward
225	PP - Former Goji Restaurant, 424 London Road, Stretton on Dunsmore, CV23 9HN	0.5	Stretton-on-Dunsmore	Dunsmore Ward
226	PP - Former Inwards House, Ashlawn Road, Dunchurch	3.42	Unparished	Dunsmore Ward
228	PP - Gateway Phase R3 (Bloor Homes)	5.28	Churchover	Coton and Boughton Ward
229	PP - Gateway Phases R5, R6, and R7 (Bloor Homes)	23.47	Churchover	Coton and Boughton Ward
230	PP - Gemini, Southam Road, Toft. CV22 6NW	0.26	Dunchurch	Dunsmore Ward

231	PP - Grange Farm, London Road, Ryton on Dunsmore CV8 3EW	0.35	Ryton-on-Dunsmore	Dunsmore Ward
232	PP - Herbert Gray College	0.73	Unparished	Eastlands Ward
236	PP - Houlton	432.2	Clifton upon Dunsmore, Unparished	Clifton, Newton and Churchover Ward, Eastlands Ward, Hillmorton Ward
239	PP - Land at Manor Farm, Hinckley Road, Burton Hastings. CV11 6RG	0.52	Burton Hastings	Wolvey and Shilton Ward
240	PP - Land at Sherwood Farm, Binley Woods (Lion Court Homes)	4.49	Binley Woods	Revel and Binley Woods Ward
241	PP - Land North of Ashlawn Road (Barratt) - eastern site	9.49	Unparished	Dunsmore Ward
242	PP - Land North of Ashlawn Road (Barratt) - western site	5.38	Dunchurch, Unparished	Dunsmore Ward
243	PP - Land North of Ashlawn Road, (David Wilson)	6.9	Unparished	Dunsmore Ward, Eastlands Ward
244	PP - Land North of Coventry Road, Long Lawford (Bloor Homes)	6.8	Long Lawford	Wolston and the Lawfords Ward
246	PP - Land north of Station Farm Cottage (Tritax Symmetry)(Parcel 12, Plot T3)	13.72	Dunchurch	Dunsmore Ward
247	PP - Land off Squires Road, Stretton on Dunsmore	2.14	Stretton-on-Dunsmore	Dunsmore Ward
248	PP - Land P19216, Brownsover Road, Brownsover	0.63	Unparished	Newbold and Brownsover Ward
249	PP - Land South East of Brownsover Lane, Brownsover Lane (Jelson Homes)	2	Unparished	Newbold and Brownsover Ward
252	PP - Land West Side of Heritage Close, Rugby	0.35	Cawston	Admirals and Cawston Ward
254	PP - Manor Farm House, Main Street, Frankton, Rugby, CV23 9PB	0.82	Frankton	Dunsmore Ward
256	PP - Newbold Farm, Main Street, Newbold, CV21 1HW	0.86	Unparished	Newbold and Brownsover Ward
259	PP - The Malthouse, Main Street, Thurlaston	0.38	Thurlaston	Dunsmore Ward
261	PP - Wolston Allotments, Stretton Road, Wolston (Spitfire Homes)	2.22	Wolston	Wolston and the Lawfords Ward
262	PP - Wolvey Campus, Wolvey (Countryside Properties)	3.75	Wolvey	Wolvey and Shilton Ward
264	PP - Rolls Royce, Prospero Ansty (Plot 5)	7.75	Combe Fields	Revel and Binley Woods Ward
265	PP - Plot 3, Ansty Aerodrome, Combe Fields Road, Combe Fields, Coventry, CV7 9JR	6.82	Combe Fields	Revel and Binley Woods Ward

266	PP - Plots 6 and 7, Ansty Aerodrome, Combe Fields Road, Combe Fields, Coventry, CV7 9JR	17.04	Combe Fields	Revel and Binley Woods Ward
267	PP - Land North and East of Castle Mound Way, Castle Mound Way, Rugby	8.69	Churchover, Newton and Biggin	Clifton, Newton and Churchover Ward, Coton and Boughton Ward
268	PP - Land South of A5 (Watling Street) Adjacent to M69 Junction 1	3.43	Burton Hastings, Stretton Baskerville, Wolvey	Wolvey and Shilton Ward
269	PP - Unit 17 Europark, Watling Street, Newton	0.25	Newton and Biggin	Clifton, Newton and Churchover Ward
270	PP - Land off Parkfield Road, Parkfield Road, Rugby	0.43	Unparished	New Bilton Ward
271	PP - SW Rugby - Tritax Symmetry, Land North of Coventry Road	47.86	Dunchurch, Thurlaston	Dunsmore Ward
275	PP - Shilton House Farm, 15 Church Road, Shilton, CV7 9HX	0.35	Shilton and Barnacle	Wolvey and Shilton Ward
291	BF Register - The Coal Yard, Ryton-on-Dunsmore	0.38	Ryton-on-Dunsmore	Dunsmore Ward
292	BF Register - 69 Temple Street, Rugby	0.09	Unparished	Eastlands Ward
293	BF Register - Land adjacent to 4 Princes Street, Rugby	0.03	Unparished	Benn Ward
295	BF Register - Land South of Technology Drive, Rugby	4.98	Unparished	Newbold and Brownsover Ward
296	BF Register - Former Warwickshire College, Lower Hillmorton Road, Rugby	5.29	Unparished	Eastlands Ward
297	BF Register - 26 Lawford Road, Rugby	0.07	Unparished	New Bilton Ward
298	BF Register - Market Quarter, Craven Road, Rugby	1.09	Unparished	Benn Ward

# APPENDIX 4: HELAA PROFORMAS

# APPENDIX 5: HELAA MAPS BY PARISH AND TOWN AREA