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Rugby Borough Local Plan
Issues and Options Consultation
Development Strategy
Planning Department
Rugby Borough Council
Town Hall
Evreux Way
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CV21 2RR

Sent via email to: localplan@rugby.gov.uk

Dear Sir / Madam,

Rugby Borough Local Plan: Issues and Options Consultation (October 2023)

Representations on behalf of Avon Timber Builders Ltd.

CC Town Planning have been appointed by Avon Timber Builders Ltd ('the client') to provide ongoing town planning consultancy services in respect of their land holdings within Rugby Borough.

The following representations are submitted to Rugby Borough Council ('RBC') in response to the recent Rugby Borough Local Plan ('LP') Issues and Options (October 2023) document which has been published for the purposes of public consultation.

At the outset, our client is aware that a significant level of work is ongoing in the background to progress and finalise the Council's evidence base to support the production of the emerging Development Plan Document ('DPD').

Therefore, the following comments respond to the content of the October 2023 document at the point of publication. However, we do reserve our client's right to amend or alter their response to the current consultation and

provide additional commentary once the Council's additional evidence base documents become publicly available.

To provide some initial context, CC Town Planning were involved at length in the production of the current 2011-31 Local Plan for Rugby Borough. Most notably, this involvement was in supporting the Council's efforts to secure and allocate a suitable range of sites to support future housing growth.

It is hoped that the experience in that process, will assist the Council in their on-going review and future efforts to adopt a new local plan.

In respect of our client, Avon Timber Builders Ltd are a long-established family business, founded in the town of Rugby and now based peripherally to the Borough. Their land interests extend to cover holdings across Warwickshire and Northamptonshire and the enclosed representations are submitted against the backdrop of their significant landholding adjacent to the Main Rural Settlement of Stretton on Dunsmore.

To this end, these representations are supplemented by a separate response to the Call for Sites invitation which has been launched by RBC. That submission highlights the sustainability credentials of their land holding. It also serves to demonstrate that all or part of the site (subject to discussion with RBC) is a positive opportunity which is immediately available and suitable for a residential development proposal to assist in meeting the Borough's future strategic growth targets.

Whilst the focus herein lies on RBC's proposed strategy for future growth, it is urged that the accompanying submission also be read alongside this correspondence.

Our client commends the efforts of the Council, to this point, in their pragmatic pursuit to adopt a new local plan for the area and it is their opinion that their landholding could assist in achieving the growth and infrastructure targets for the plan area.

It is urged that in considering consultation responses, the Council remain mindful of the recently published National Planning Policy Framework (2023) ('NPPF') and the content of the emerging Levelling-up and Regeneration Bill.

Rugby Borough Local Plan: Issues and Options Consultation

The following representations serve to respond to those pertinent points from the document which are applicable to our client's interests and does not present a wholesale appraisal of the document in its entirety.

It is considered important that housing delivery, alongside responding to national government requirements, should also be considered in the context of the Council's emerging strategy for economic growth. The consultation document provides a reasoned overview as to the potential amount of land required to meet strategic growth targets and lays focus on the strategic significance on Rugby Borough within the 'golden triangle' of storage and distribution.

The efforts to ascertain the amount of land to be delivered is welcomed however it is considered that, as with housing targets, a greater level of consideration will be required to ascertain the level of Coventry's floorspace needs that cannot be met within their plan area. To this end, it is considered that the emerging document should plan for an appropriate apportionment of that need for employment land which cannot be met within Coventry City's legislative boundary.

Yet further, the document does appear lay significant focus on the need for warehousing and floor space to meet the needs of that particular sector. Whilst reference is made to the strong manufacturing base in the Borough it is considered that an element of aspirational growth should be planned for, such an approach would ensure that there is a flexible balance of land with no over-reliance on any single particular sector.

In terms of the potential locations for such growth, it is considered that development along the Borough's strategic corridors (A45 / M6 / A5) is the

most appropriate approach, once sustainable locations adjacent to the urban edge have been exhausted.

Whilst our client does not seek to provide a pointed response to the Council's proposed approach to controlling the delivery of HMOs in the plan area, they do consider that greater attention be paid to the reasons behind the growth in such properties.

It is accepted that anecdotal evidence suggests that the growth in HMO's is due to increased local employment opportunities, immigration and a lack of smaller properties. However, the trend of increasing HMOs in both town centre, suburban and other locations also comes as a result of the overriding lack of housing delivery not just in Warwickshire, but nationally.

Our client accepts that control should be placed on concentrations of HMO's. However, it is urged that the Council accept that an increased level of housing is required in terms of overall strategic target but also in terms of rates of delivery. The only way that this can be achieved is through the allocation of additional land for housing delivery of all sizes, types and tenures.

Our client's land holding at School Lane, Stretton on Dunsmore presents a suitable and sustainable residential development opportunity that could assist in meeting the social, economic and environmental aspirations of the Parish of Stretton on Dunsmore. Yet further, it could assist in meeting the wider vision and objectives of the emerging Local Plan and could play a complimentary role to larger strategic growth at Rugby town, whilst strengthening sub-regional links between Rugby and Coventry.

In assessment of Section 9 of the consultation document, it is urged that the Council revisit the consultation publication and consider its content against the provisions of the newly issued NPPF which was published in December 2023 during the course of the consultation.

Para 61 of the NPPF is now clear that the standard methodology should be the starting point for calculating the minimum number of homes required but

also re-affirms that *'any need that cannot be met within neighbouring authority areas should also be taken into account in establishing the housing need to be planned for'*.

The consultation document comments on the data inaccuracies experienced in Coventry and also is clear on the role which Rugby Borough has historically made in meeting the needs which have been unable to be met within the legislative boundary of Coventry. However, it is clear from the high number of HMO's which are becoming increasingly prevalent in the Borough that there is clearly a need for a step change in housing delivery year on year.

The comparative picture of housing growth within the Borough, to national growth, is clear that the Borough is seen as an attractive location to reside. There are clear economic, social and environmental benefits to be realised through increased levels of growth, most notably in efforts to regenerate the town centre over the longer term, and the emerging plan should seek to sustain this growth.

In considering those growth scenarios at Para 9.23. The trends being experienced nationwide, the attractiveness of the Borough as a place to live and the components of international migration and natural change would point towards the requirement for allocating additional land to meet future growth.

Yet further, the only cross boundary relationship referred to within the consultation document is that with Coventry. However, as acknowledged within the HEDNA at Para 1.9 Rugby Borough does have an overlap, in terms of housing market, with West Northamptonshire and the Leicestershire authority area of Hinckley and Bosworth, both Leicestershire and areas of West Northamptonshire are currently facing housing delivery issues, with one of the key factors being that of capacity. These issues could, in part, be alleviated through an uplift in the level of housing to be delivered within Rugby Borough over the course of the newly proposed plan period.

Therefore, in pointed answer to Q1 of the appropriate plan period would be 2021-41 and the starting point for establishing the requirement should be the HEDNA 2022 with appropriate buffer applied and an uplift to account for those aforementioned issues.

In terms of the location for future growth, the approach contained within the current adopted local plan is considered to be a pragmatic response to alleviate the historic pressure that has been imposed on the urban area of Rugby.

It is positive that the consultation document once again acknowledges the important complimentary role that Main Rural Settlements can play in seeking to achieve sustainable Borough wide growth.

As the most sustainable location for growth, it is of course accepted and urged that appropriate higher density proposals within Rugby Town Centre and the wider urban area are encouraged and supported through appropriate policy. These areas, which are highly accessible and in close proximity to the Borough's largest concentration of shops, services and community facilities provides the most suitable location for delivering a larger number of smaller homes.

It is acknowledged that the historic approach of the Council has been to achieve strategic growth through the allocation and development of land as sustainable urban extensions to the urban area. Cawston Grange, Coton Park and the newer Eden Park and Houlton developments all combine to deliver the wealth of the Borough's new residential development.

The approach in the current local plan was to compliment the urban extensions through a number of smaller, decentralised and complimentary, allocations at Main Rural Settlements which were largely pursuant to the size of the settlements to which they are attached.

A number of these allocations now have full planning permission with delivery anticipated in the near term. Once development is permitted on

smaller sites, in Main Rural Settlement locations, their complimentary contribution to the local housing market can be realised relatively quickly.

As such, our client welcomes the Council's intention to allocate further complimentary growth in the rural areas, particularly through the intended additional allocations at the Main Rural Settlement.

However, it is urged that the apportionment of allocations to each of the MRS should be carefully conceived and that greater focus be placed on bolstering those aforementioned links between Rugby and Coventry and those MRS which lie in greater proximity to major arterial routes within the Borough.

Stretton on Dunsmore is an example of a settlement where there is an appetite, particularly in the case of our client, to develop their site in a manner that can assist in meeting community aspirations. Alongside community aspirations, there is a significant pressure / demand for housing in this area of the Borough due to its locational advantages and attractiveness of the settlement. Stretton on Dunsmore itself lies directly adjacent to the strategic highway network, a network that provides high quality links to both Rugby and Coventry and their respective employment opportunities.

Spatially, it is considered that the settlements of Ryton on Dunsmore, Stretton on Dunsmore and Binley Woods provide the greatest opportunity for growth which will build upon the relationship between Rugby and Coventry.

The growth experienced at the former Peugeot Site at Ryton, coupled with the expansion of Jaguar Land Rover, the Coventry Gateway development (which is currently under construction) and the ongoing works at Symmetry Park on the A45 at the South West Rugby SUE have increased pressure for housing at Stretton. Yet further, the proposed re-location of the Frasers Group HQ to Ansty, along with the aspirations for growth to the east of Coventry will only further compound issues in an area where demand already significantly outweighs the supply of housing.

Further allocations and SW Rugby, South of Hillmorton, Clifton upon Dunsmore, Newbold on Avon and South of Hillmorton should not be

discounted as having a role to play. However, it is considered that to ease pressure on the urban area, the next wave of growth could be beneficially spread across the remaining MRS, with a focus on the A45 corridor. Such an approach would allow the existing urban extensions to be built out and ensure the town centre becomes a focus for growth at Rugby itself.

Therefore, it is reasonable to conclude from the client's perspective that the HEDNA 2022 should be the absolute starting point for establishing the minimum level of need. There is support for the Council's stated intention to deliver social and affordable housing in the urban area, notably the town centre. The evidence base is clear that the MRS are sustainable settlements and therefore their suitability to support housing growth is clear, whilst there is broad support for the strategy proposed by the Council, it is considered that a greater reliance should be placed on those Main Rural Settlements that are at greater distance from Rugby town in order to reduce pressure on the urban area and strengthen the towns relationship with surrounding urban areas, the most notable of which is Coventry.

It is considered that this submission provides sufficient feedback which is pursuant to the level of detail contained within the consultation document. However, our client reserves the right to provide additional commentary and recommendations as future iterations of the local plan are published for the purposes of consultation.

It is urged that this submission be read in conjunction with the Call for Sites submission lodged on behalf of Avon Timber Builders. Should any questions arise or if you would care to discuss the above or our client's land holding then please do not hesitate to contact me via any of those channels listed above.