

Land at Newton Manor Lane, Rugby

Rugby Borough Local Plan Issues and Options: October 2023

Clarion Housing Group

02 February 2024

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Appendices

Appendix 1 Concept Masterplan

1.0 Introduction

- 1.1 These representations to the Rugby Borough Local Plan: Issues and Options Consultation (“IO”) have been prepared by Lichfields on behalf of Clarion Housing Group.
- 1.2 We focus on the strategic matters that are contained within the IO consultation document and relate specifically to Clarion Housing’s land interests at Newton Manor Lane, Rugby (“the Site”). A Concept Masterplan for the site is appended to these representations (Appendix 1).
- 1.3 Clarion Housing is looking to promote the site to be allocated for residential development through the new Local Plan and are seeking to work constructively with Rugby Borough Council (“the Council”) as it progresses towards the submission and adoption of the new Local Plan and trusts that the comments contained within this document will assist Officers in this regard.

Plan Making To Date

- 1.4 Rugby Borough Council are in the early stages of preparing their new Local Plan. On 14th December 2022, the Council decided to go ahead with a full update of the Local Plan policies. The report to Council found several changes in favour of a plan update, which included the declaration of a climate change emergency by the Council, the introduction of the Environment Act 2022 and its requirement for Biodiversity Net Gain, new evidence of future needs for homes and employment land, particularly for warehousing uses, through the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022, and the need for policies to support the regeneration of Rugby town centre.
 - 1.5 Alongside the IO consultation Rugby Borough Council are also undertaking a ‘Call for Sites’ exercise to inform their Housing and Economic Land Availability Assessment (HELAA) which is the first stage in the process of assessing sites for allocation in the new Local Plan.
 - 1.6 The Council also published a new Local Development Scheme (LDS) in October 2023. This sets out the timetable for progressing the new Local to adoption. Following Issues and Options consultation, the next stage of the Local Plan review will be the Preferred Options (Regulation 18) in July 2024, Pre-submission consultation in January 2025, submission for examination in June 2025 and adoption by the end of 2026.
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2.0 **Area of Response**

2.1 The Areas of response focus on Section 9 of the IO consultation documents relating to ‘Land for Housebuilding’ and consultations questions 31-35.

31. How many homes should we be planning for?

(a) Minimum local housing need

(b) The HEDNA 2022 need

(c) Other (please specify)

2.2 The objective of the Government in relation to the delivery of housing remains fundamentally unchanged within the new NPPF published in December 2023, which is stated at paragraph 60 as “*significantly boosting the supply of homes*”.

2.3 It is also the case that the updated NPPF still makes it clear that:

“Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas” (Para 11b).

2.4 It also states that:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance... In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for” (Para 61)

2.5 In this context, it is noted that the IO sets out the housing need for Rugby Local Plan, highlighting that the Rugby housing requirement is underpinned by the Local Housing Need (“LHN”) figure generated by the standard method. On this basis, the IO states that the Local Plan will need to deliver a minimum of 506 new homes each year, which equals c. 11,000 dwellings over the 20-year plan period or c.16,000 dwellings over the 30-year plan period.

2.6 Importantly, paragraph 61 of the NPPF states that the Standard Method “*is an advisory starting-point for establishing a housing requirement for the area*”, and that there may be exceptional circumstances which justify an alternative approach.

2.7 Regarding the housing requirement figure for the Local plan period, NPPF paragraph 67 states:

“...The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.” (Emphasis added)

2.8 Both the NPPF and PPG are clear that the LHN figure generated by the standard method is a minimum starting point (i.e. actual housing need may be higher than this figure). Moreover, elsewhere in the guidance, the PPG differentiates between the minimum figure

arrived at through the standard method and ‘actual’ housing need which can be higher. It is ‘actual’ housing need that represents the objectively assessed need to which the tests in paragraph 11 of the NPPF apply. There is a requirement for the Council to test reasonable alternatives and actively identify whether there are reasons for testing higher figures as estimates of housing need.

- 2.9 Fundamentally, this is because the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour, nor considers local factors, policy and aspiration which might legitimately mean the Council should seek to plan for more homes than the minimum. The PPG goes on to state that it would be appropriate for a higher figure to be adopted on the basis of employment, infrastructure, affordable housing or unmet housing needs.¹ Therefore, an uplift to LHN can be applied when supported by evidence.
- 2.10 Clarion Housing considers that a housing requirement greater than the LHN should be adopted and does not support option (a) of Question 31. As acknowledged above, NPPF paragraph 61 states that the local housing need figure determines the minimum number of homes needed (emphasis added). It is considered that there are a number of specific factors that Clarion Housing consider would justify a deviation from the LHN figure.
- 2.11 Clarion Housing are supportive of option (b) which would plan for the needs identified in the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA).
- 2.12 As acknowledged within the IO, subsequent to the release of the 2014-based projection, based on more up-to-date evidence about fertility, mortality and household formation rates, the HEDNA applied alternative projections. The HEDNA provides up-to-date evidence justifying an uplift to the LHN and would therefore be found to be a more suitable housing requirement for the emerging plan period. The HEDNA considers that the following two main considerations justify an uplift to the LHN:
- *“Firstly that demographic data on which projections are based is demonstrably wrong and cannot realistically be used for trend-based projections on which the Standard Method is based; and*
 - *Secondly that demographic trends have changed so much that it is unrealistic to use a set of projections based on information in a trend period to 2014, which is now over 8-years old.”* (paragraph 5.16)
- 2.13 The evidence provided in the HEDNA demonstrates that based on the trend-based data, the overall housing need for Rugby has increased from 516 dpa to 735 dpa.
- 2.14 As at 31st March 2023, the total identified supply to 2041 is 13,056 dwellings and the total identified supply to 2050 is 15,346 dwellings. Taking the HEDNA housing need figures, this would result in an outstanding supply of 3,114 dwellings up to 2041 and 8,101 dwellings up to 2050.
- 2.15 Notably, the tables breaking down the current and outstanding supply within the IO consultation document, apply a 10% supply buffer. The 5% and 10% buffers are no longer required by the NPPF. The removal of the 10% buffer results in a total housing need up to

¹ PPG ID: 2a-010

2041 of 14,700, and 21,315 dwellings up to 2050. Based on the figures within the HEDNA, a shortfall in supply still remains of 1,644 dwellings and 5,969 dwellings respectively.

- 2.16 Clarion Housing considers that the level of demand for affordable housing within Rugby also justifies an uplift to the LHN figure identified within the IO in order to address the worsening affordability within the area. In the context of affordable housing, whilst the standard method includes an adjustment to take account of the median affordability ratio, the PPG² is clear that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.
- 2.17 Both the IO and the HEDNA have recognised the issue associated with the affordability of housing in the borough. Paragraph 9.5 of the IO acknowledges that “*average house prices in Rugby Borough in 2023 were 7.17 times average incomes.*” This has led to the Council adopting a 20% uplift to housing need. The HEDNA has acknowledged the severity of the issue and has applied a 22% uplift to the household growth figure.
- 2.18 It is considered, therefore, that an uplift to the housing need is therefore justified in order to address the pressures of affordability within Rugby and to maximise the supply of affordable housing. The PPG is clear that an increase in the total housing figures included in the plan could help address the affordability of homes, through the delivery of an increased number of affordable homes.
- 2.19 Whilst Clarion Housing are supportive of the housing need figure evidenced in the HEDNA, they consider that there is also an argument for option (c) and a further increase to the housing need figure within the next Local Plan. The HEDNA has applied an uplift in order to address the affordability issues within Rugby but the scale of the unmet housing need emerging from within the Coventry and Warwickshire Housing Market Area (C&W HMA) is also a critical consideration.
- 2.20 Coventry’s current Local Plan confirmed an unmet housing need of 17,800 dwellings up to 2031. These needs were met within respective adopted Local Plans throughout the C&W HMA, as agreed through the 2017 Memorandum of Understanding (MoU). Rugby Local Plan Policy DS1 identifies overall development needs for Rugby in the period of 2011-2031 which comprises 12,400 new homes, including 2,800 dwellings to contribute towards Coventry’s unmet needs. This recognised that Coventry City Council was unable to accommodate its housing needs in full within the City boundary.
- 2.21 In December 2020, the Government revised the Standard Method following the ‘Changes to the current planning system’ consultation. The PPG³ was revised to include a further stage within the Standard Method which applied a 35% uplift for those urban local authorities in the top 20 cities and urban centres list; which includes Coventry. As a consequence of the new Standard Method, Coventry’s minimum annual housing requirement is 3,247 dpa
- 2.22 As discussed earlier in this response, the HEDNA deviates away from the main Standard Method’s required use of the 2014-based projections and prepares its own ‘trend-based projections’. In this regard, the HEDNA derives its own sub-national population projections based on several different datasets to reflect a 10-year migration trend. The HEDNA then runs these baseline population projections through the Standard Method framework (i.e.,

² PPG ID: 2a-024

³ PPG ID: 2a-004

an uplift for the median affordability ratio), and, importantly, the 35% Urban Centres uplift is applied. Consequently, the HEDNA concludes on an OAHN of 1,964 dpa for Coventry.

- 2.23 Taking the HEDNA's OAHN for Coventry, it is calculated that there is an unmet need of c.14,122 dwellings over the next Plan Period. Whilst this is lower than the Standard Method calculation, it still constitutes an acute level of unmet housing need within the HMA.
- 2.24 It is considered highly likely that Coventry will continue to face further significant land capacity and availability pressures (i.e., more unmet housing needs up to 2041), which the Council and other HMA authorities will need to assist in meeting. There is a clear and cogent need for the Council to work alongside the other HMA authorities to ensure that the HMA's existing unmet housing needs up to 2031 are addressed alongside the likely emerging unmet needs up to 2041 and beyond.
- 2.25 On this basis, a key hurdle for all authorities in the C&W HMA, will be the need to once again strategically and collaboratively grapple with how these unmet housing needs can be addressed through the various emerging Local Plan reviews. In this regard, Clarion Housing contend that the Council, alongside other C&W HMA authorities, should work together to identify and meet the housing needs of the C&W HMA, underpinned by adequate, relevant, and up-to-date evidence as soon as possible.
- 2.26 The approach adopted by the C&W HMA authorities to distribute Coventry's unmet housing needs through the 2017 MoU centred around the functional relationship (e.g., migration and commuting). The preparation of the 2017 MoU, based on a joint evidence base, enabled a consistent approach to plan-making and addressing these needs quickly across the HMA which dealt with, rather than deferred, this important and strategic cross-boundary matter. Crucially, the Inspectors at the EiPs endorsed this approach too – see for example the Stratford-on-Avon Core Strategy (2017) Inspector's Report.
- 2.27 Whilst the NPPF and PPG provide no formal mechanism to undertake this task, it is clear that the approach taken by the C&W HMA authorities within the 2017 MoU, which was endorsed by Inspectors, has now been utilised elsewhere within the country to determine an evidence led apportionment of unmet housing needs. In the absence of this, there is a very real risk that Coventry's housing needs may not be fully met.
- 2.28 In summary, Clarion Housing's response to Question 31 does not support option (a) put forward within the IO Consultation document but are supportive of the evidenced uplift in local housing need figures within the HEDNA (Option (b)). Clarion Housing would also be supportive of a potential option (c) as an alternative, which would further increase the number of homes to be delivered in Rugby in order to accommodate a proportion of Coventry's unmet need.
- 2.29 Importantly, the Council will need to identify a suitable supply of sites in order to meet this identified need within the HEDNA, and the likely unmet need arising from Coventry and the wider C&W HMA. Clarion Housing considers that the identification of a variety of suitable sites would accord with paragraph 60 of the NPPF which clearly states that, "*it is important that a sufficient amount and variety of land can come forward where it is needed.*"
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32. Would you support RBC both improving existing and developing new social and affordable housing (like the regeneration of Rounds Garden and Biart Place)?

- 2.30 The updated NPPF remains clear that:
- 2.31 *“the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing”* (Para 63).
- 2.32 As discussed in our response to Question 31 above, the HEDNA sets out new trend-based projections for the sub-region and identifies that issues regarding housing affordability are particularly acute within Rugby, with paragraph 9.27 of the IO noting that *“the evidence shows considerable need for affordable housing, particularly in the social or affordable rented tenures (together making up 82% of affordable housing need)”*.
- 2.33 The HEDNA sets out a total net affordable housing need of 495 dpa for Rugby (Affordable owned and social rented). It will be important for the new Local Plan to maximise the number of new affordable homes that are built. In light of this identified need, Clarion Housing considers that an uplift to the LHN figure would be considered to be sound at Local Plan examination.
- 2.34 There is evidently a substantial level of demand for affordable housing within the area, and on this basis, Clarion Housing is supportive of the delivery of new social and affordable housing both through the regeneration of sites such as Rounds Garden and Biart Place and provision within the new residential development.
- 2.35 Clarion Housing is the UK’s largest social landlord and developer and is committed to providing good quality homes for people across the country, focusing on serving the needs of people who require affordable housing. The first priority is to improve the wellbeing of existing and future residents, in addition to helping to meet the housing need within local areas.
- 2.36 One of Clarion Housing’s case studies is from within the London Borough of Merton, where proposals were submitted for the regeneration of three estates within Merton. This development will deliver around 2,800 new homes including 740 social rented homes demonstrating Clarion Housing’s commitment to helping meet the affordable housing requirements.

33. Please provide any comments you have on the suitability of any of the broad locations listed above for new housing. Are there are any locations that we have missed?

- 2.37 It has been noted that the Council is yet to conduct a Housing Economic Land Availability Assessment to assess the potential locations for housing development. For the purpose of the IO consultation, a number of broad locations have been identified for achieving housing growth, including Rugby town centre. The Council have not yet put forward a proposed spatial or development strategy for the borough over the next Plan Period. Clarion Housing reserve the right to comment in this matter as the new Local Plan progresses.
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- 2.38 It is noted that over recent years, housing and economic growth has been largely focused on the main settlement of Rugby with some smaller scale development within the main rural settlements, which is reflected in the spatial strategy within the currently adopted Core Strategy. Rugby is likely to continue at the top of the settlement hierarchy for the Borough, and remain as the main focus for growth over the next Plan Period due to the continued delivery of a substantial amount of new housing on existing Sustainable Urban Extensions (SUE) allocations at Coton Park East, Rugby Radio Station and South West Rugby.
- 2.39 Rugby is acknowledged as being the most sustainable location for growth within the Borough, and Clarion Housing considers that the growth of existing settlements should form an important part of the spatial strategy, focusing on the main settlement of Rugby. The NPPF emphasises importance “*on the need to support economic growth and productivity*” (Paragraph 85) and Clarion Housing believes that supporting growth at these locations would help achieve this objective.
- 2.40 Whilst the NPPF recognises that “*the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements*” (Paragraph 74), it is equally clear that small-medium sized sites can make a valuable contribution to meeting the housing requirement of an area (Paragraph 70). Therefore, the Local Plan will need to allocate a variety of small-medium sized sites in order to meet the housing need. Clarion Housing considers that the proportionate growth of existing settlements will play a key role in fulfilling this requirement.
- 2.41 It is noted that two thirds of Rugby Borough is designated Green Belt, and that the main rural settlements are located in the Green Belt. Careful consideration will need to be given to future proposals for housing growth at these settlements, which will require the alteration and removal of land from the Green Belt. In accordance with NPPF paragraph 144, it will be necessary for the Council to demonstrate robust “*exceptional circumstances*” to justify the release of Green Belt land.
- 2.42 Clarion Housing acknowledges that the IO consultation identifies M6 Junction 1 as a potential location for new housing. The M6 currently forms the northern boundary of the urban area of Rugby, and it is noted that to the south of the motorway, there is limited land available outside the Green Belt to the west of the current urban area. As such, Clarion Housing encourages the Council to direct new housing development towards the north-east of Rugby.
- 2.43 The area between the north-east of Rugby and Newton is a suitable location for accommodating part of the emerging housing need. This broad location is adjacent to the built-up boundary of Rugby and is therefore well connected to existing local amenities and facilities, is an accessible location which promotes the use of active modes of travel promoting a healthy and sustainable lifestyle. This part of Rugby is well connected to the strategic transport network and is accessible via public and private transport offering the opportunity to achieve sustainable development. The M6 is located north of the site and can be accessed within 7 minutes via car.
- 2.44 Recent development towards the north-east of Rugby, and the site allocations within the adopted Local Plan (DS3.1 and DS4.1) show the suitability of the area. The allocation of additional housing to the north-east of Rugby would form a logical and sustainable extension to the built environment.
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2.45 In this context, Clarion Housing is promoting the land at Newton Manor Lane, Rugby for residential development. Development on the edge of Rugby lends itself well to achieving a proportion of the required development. Alongside these representations, the site is being submitted as part of the 'Call for Sites' consultation. A Concept Masterplan is included at Appendix 1 and further details of the site are covered in Section 3.0 of these representations which confirms that the site is 'suitable, available and achievable'.

34. Do you support a requirement for all new dwellings to meet the additional Building Regulations standard for accessible and adaptable dwellings and for at least ten percent of dwellings to be suitable for wheelchair users?

2.46 In terms of achieving sustainable development, NPPF paragraph 8 outlines a social objective which requires the planning system to:

“support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations”

2.47 Clarion Housing recognises the importance of including design-based policies within the Local Plan Review in order to enhance the quality of housing and provide a good quality of life for current and future residents.

2.48 The ageing population is projected to increase within the HMA, and an ageing population means that the number of people with disabilities is likely to increase substantially. Using the trend-based projections, the HEDNA states that for between 2022 and 2032, the HMA will experience an 18% increase in the population aged 65 and over (potentially accounting for 54% of total population growth) (paragraph 14.73). Furthermore, as outlined by table 14.6 within the HEDNA, the projected change of the population with a mobility problem within the C&W HMA is 20.2% between 2022 and 2032.

2.49 As stated by paragraph 9.32 of the IO, the HEDNA recommends that the Council requires all new dwellings in all tenures to meet optional Building Regulations M4(2) standards for accessible and adaptable dwellings, which are similar to the Lifetime Homes Standards. It also recommends that at least 10% of homes meet the higher M4(3) wheelchair user dwelling standards (with a higher proportion needing to meet this standard in the affordable sector).

2.50 In consideration of the ageing population and the high levels of disability amongst older people within Rugby and the wider HMA, there is likely to be an increased requirement for specialist housing within the emerging Local Plan period.

2.51 However, Clarion Housing acknowledges that HEDNA paragraph 14.66 states the following:

“As with M4(2) homes it may not be possible for some schemes to be built to these higher standards due to built-form, topography, flooding etc. Furthermore, provision of this type of property may in some cases challenge the viability of delivery given the reasonably high build out costs”.

2.52 Although the NPPF supports the implementation of additional standards when justified by evidence, Clarion Housing also advises the Council to consider a flexible approach and the

viability of implementation on a site-by-site basis. As recognised, the ability to implement the additional standards can be restricted by constraints to development and viability issues. A degree of flexibility must be provided so that deviation can be allowed on a site-by-site basis where up-to-date evidence is provided.

- 2.53 It is important to note that NPPF paragraph 135 requests that planning policies should ensure that developments “create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users”. Footnote 49 of NPPF paragraph 135(f), which states that “*Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.*” Furthermore, NPPF paragraph 31 states that all policies should be “underpinned by relevant and up-to-date evidence”.
- 2.54 In addition, the PPG⁴ sets out:
- 2.55 “*Where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Local planning authorities should take account of need, viability and timing.*”
- 2.56 In consideration of the above, Clarion Housing are supportive of the policy requirement to implement the NDSS and additional Building Regulations in principle, providing that there is sufficient evidence demonstrating the case for the Borough in accordance with the NPPF and PPG. However, Clarion Housing would want to see some flexibility applied to any such policy, which would take into consideration site constraints and viability. This would ensure that the approach is supported and justified by up-to-date evidence and that the approach can be found to be sound in accordance with NPPF paragraph 35.

35. Please provide any comments you have on the type and size of new homes we need.

- 2.57 The NPPF states:
- 2.58 “*The overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community.*” (Paragraph 60)
- 2.59 The HEDNA provides evidence on the mix of new housing that is likely to be needed in the upcoming Local Plan period, both for affordable and market housing. The table below shows the recommended mix of sizes of new homes for different tenures:

⁴ PPG ID: 56-020

Figure 2.1 Suggested Housing Size Mix

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market housing	10%	30%	45%	15%
Affordable home ownership	20%	40%	30%	10%
Rented affordable housing	35%	30%	20%	15%

Source: Coventry & Warwickshire Housing & Economic Development Needs Assessment (November 2022)

- 2.60 The IO states that the focus is on providing 2 and 3 bedroom properties as this takes into account the ageing population within Rugby. The provision of suitable housing sizes can have an enabling effect in rightsizing the type of home the elderly population lives within, therefore increasing the availability of 4+ bedroom dwellings for families.
- 2.61 Paragraph 4.10 of the HEDNA's executive summary states *"In applying the evidence, consideration should be given to the existing house mix in the locality and gaps within this; site location and characteristics; and local needs or market evidence."*
- 2.62 Paragraph 9.31 of the IO states *"It is also important to note that housing mix policies set out the mix of housing we need across the borough. It will not be realistic to seek exactly this mix from every new development."*
- 2.63 Clarion Housing supports the statements made by the IO and the HEDNA as the housing mix must be based on the most up-to-date evidence and specific circumstances of each development. When considering the proposed housing mix on a site-by-site basis, the decision maker should also consider the local housing market and other site constraints, as well as any viability issues that may justify a deviation from the policy requirement.
- 2.64 As established in the 'William Davis Ltd v Charnwood Borough Council's judgment, Clarion Housing recommends that the Council should explicitly set out market and affordable housing mixes by dwelling size within the policy housing mix, which can be guided by the Council's evidence base (i.e. the latest Housing Market Assessment). Secondly, the policy should include wording that defers to alternative mixes should more up-to-date information become available. This is because the latest Housing Market Assessment is a point in time assessment, and the needs and demands for dwelling sizes within the Borough will evolve over time, and the policy should be suitably flexible for developments to respond to this.
- 2.65 Although, a borough wide need has been identified, Clarion Housing supports the Council's acknowledgement of site-specific constraints. It would be an unsuitable strategy to apply a prescriptive mix to all development sites now as individual sites may not come forward for several years, by which time the Borough's evidence base would be out of date. Any housing mix policy should allow for proposed housing mixes to be justified based on market signals and evidence of housing need and demand at the point of decision-making, rather than a prescribed housing mix set out in the current HEDNA that could quickly become out-of-date. This is crucial as a more up-to-date assessment of local housing needs could likely supersede the latest Housing Market Assessment at the point of decision-making.

⁵ William Davis Ltd v Charnwood BC Queen's Bench Division (Administrative Court) 23 November 2017 [2017] EWHC 3006 (Admin)

- 2.66 Flexibility within the housing mix policy is required as the housing mixes across urban, suburban and rural areas will generally be reflective of the locations' existing characteristics. For example, densities in urban areas will generally be higher (and more suited to smaller 1-2 bed dwellings) in urban areas and town centres, whilst being lower on the edge of settlements and in rural areas. This is generally consistent with NPPF paragraph 128, in regard to making effective and efficient use of land and achieving appropriate densities. It would, therefore, be reasonable for schemes across the Borough to deliver different mixes of housing whilst still meeting the overall Borough-wide need.
- 2.67 In summary, whilst Clarion Housing would support the inclusion of a housing mix policy within the Local Plan Review, the Council should not be overly prescriptive in the application of a Borough-wide housing mix. Flexibility should be applied and the housing mix required should be based on the most up to date evidence and assessed on a site-by-site basis alongside the most up to date local market evidence.

3.0 **Land at Newton Manor Lane, Rugby**

- 3.1 As set out in Section 1.0 of these representations, Clarion Housing is promoting land at Newton Manor Lane, Rugby for landscape-led residential development. Clarion Housing aspires to invest in and deliver a new development of the highest quality in this location. The Concept Masterplan is attached to Appendix 1 of these representations demonstrates Clarion Housing's commitment to helping Rugby to achieve its aspirations over the next Plan Period, by creating an attractive and healthy environment for future residents which focuses on sustainability, green infrastructure and biodiversity, accessibility and active travel.
- 3.2 The site, encompassing an area of 25.36 ha, is currently used as agricultural land and is accessed via Newton Manor Lane, which runs along the southern boundary of the site. The site adjoins the built-up area boundary of Rugby offering a suitable opportunity for a medium sized extension to the settlement. The site is bound to the northwest by the Great Central Walk which follows the route of a disused railway line and is designated as the Ashlawn Cutting Local Nature Reserve (LNR). It is now a recreational route for pedestrians and cyclists. Existing residential areas of Rugby dating back 20 years is located on the other side of the Great Central Walk. The site is bound to the east by a hedgerow along which runs a stream which is a tributary of the River Avon located further south. East of this is a series of pastoral fields. The built edge of Newton village lies approximately 150m east of the site at its closest point.
- 3.3 Initial technical assessment has been undertaken relating to highways, flood risk and drainage, ecology, landscape and visual impact and heritage to inform the development of a sensitive and high-quality Concept Masterplan, demonstrating a deliverable development which fully considers all constraints and opportunities. A new Vision Document is currently being prepared to incorporate the additional land proposed for a secondary school and will follow.
- 3.4 It is confirmed that there are no physical or technical constraints upon the development of the Site that cannot be mitigated. As such, the site is considered to be suitable, available and deliverable within the first 5 years of the Plan Period.
- 3.5 Clarion Housing considers that the land at Newton Manor Lane offers an ideal opportunity to deliver a high-quality, attractive and well-integrated new neighbourhood, which forms a natural and logical extension to Rugby accessible to existing facilities and community services.
- 3.6 The overall site area is 25.36 ha, of which 6.80 hectares is currently being proposed for residential development, equating to up to 240 new homes, alongside the provision of land to accommodate a new secondary school to serve residents daily needs. The site also provides the opportunity to improve accessibility in this part of Stourbridge in terms of public transport and pedestrian and cycle paths, areas of green open space and extensive blue and green infrastructure networks, and ecological enhancements in order to achieve a minimum 10% net-gain in biodiversity.
- 3.7 The development proposal will provide an array of social, environmental and economic benefits including but not limited to:
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- The provision of up to 240 dwellings towards meeting the needs of the Borough.
- Clarion Housing has the in-house capability to deliver affordable, private sale and build to rent product which the developer can flex to suit individual sites, accelerate delivery and deliver market need to operate in varied economic cycles.
- A network of safe, convenient and direct pedestrian and cycle paths which provide connectivity to the surrounding area of Rugby and local amenities and facilities.
- Short and direct walking and cycling connections will make public transport an easy choice to make. The 20-minute neighbourhood concept has been made a priority.
- 10.45 ha of new public open space will provide recreational opportunities, children's play facilities, Trim-Trail, community orchards, allotments and ecological enhancements. Clarion Housing is committed to achieving a 10% net gain in biodiversity.
- Large wildlife corridors will enhance the surrounding local wildlife and nature sites, ensuring the new homes compliment and respect these local wildlife assets. New planting will be provided and existing open space will be enhanced.
- Clarion Housing is committed to delivering Net Zero Carbon 'compatible' housing that incorporates the latest energy efficient materials and technology.
- The development will generate additional residential expenditure in the local economy.
- The site is located in a well-connected location which will ensure good accessibility to existing local community facilities for future residents. This will help provide a high quality of life for future residents. The proposal will also provide a secondary school in order to help reduce the pressure on higher education provision.
- The development will maintain the separation gap between Rugby and Newton ensuring that settlement character is maintained.

3.8 A site allocation to the north-west of the site (allocation reference: DS4.1) was designed to include the provision of a secondary school. However, now developed, the site has not provided the planned educational provision. There is likely to be a demand for secondary school places within the north of Rugby which is now not going to be accommodated within the Coton Park East development. This has been considered by Clarion Housing, who have extended their site area further to the east in order to accommodate sufficient land for the provision of a secondary school.

3.9 The proposed development will be an inclusive place that meets the needs of a broad range of future residents, contributing towards meeting the housing needs of Rugby over the next plan period.

3.10 In summary, it is confirmed that the land at Newton Manor Lane is 'suitable, available and deliverable' and a Concept Masterplan has been included at Appendix 1 to demonstrate what can be achieved on the site. A Vision Document will follow is submission to further demonstrate that the site is capable of delivering an urban extension to north-east of Rugby which can help meet the identified housing needs over the next Plan Period, as well as providing essential infrastructure to support the population of north Rugby in the form of land for secondary school.

Appendix 1 Concept Masterplan



- Site Boundary: Aprx. 25.36ha
- Potential vehicular access points
- Potential developable area: Aprx. 6.80ha (Up to 240/250 dwellings @ 35/37dph)
- Low density housing to respect the edge of settlement countryside edge
- Potential Area for Education: 5.50ha
- Potential public open space
- Potential woodland, thicket and wildflower belt planting
- Potential community orchards
- Potential location for children's and teenagers' play provision
LEAP - Local Equipped Area for Play
LAP - Local Area of Play
- Potential Trim Trail Stations
- Potential location for sustainable drainage features (SuDS) with permanently wet areas for habitat creation
- Potential location for Wildlife Ponds
- Potential primary streets within the development
- Potential secondary streets within the development
- Avenue street tree planting
- Potential pedestrian and cycle routes
- Potential re-routing of the Public Footpath
- Potential shared surface/pedestrian priority
- Potential pedestrian and cycle links
- Potential location for community allotments
- Potential location for pump station (15m cordon sanitaire)

POTENTIAL INFLUENCES & CONTEXT

- Allocated Land (Residential & Employment Development) Policies DS3.1, 3.2 and 4.1 Rugby Borough Local Plan (Adopted 2019)
- Local Nature Reserve (LNR) 'Ashlawn Cuttings & Great Central Walk' Warwickshire CC - Biological Records Centre
- Local Wildlife Site (LWS) 'Coton Park Pools' (Reference: 40257) 'Great Central Walk North' (Reference: 02577) Warwickshire CC - Biological Records Centre
- Streams and Rivers: 'River Avon and Tributaries' (Reference: 40257)
- Existing vegetation
- Surface water flooding (Source: Glovic - Flooding)
- Fluvial flooding (Source: Glovic - Flooding)
- Existing water bodies and courses
- Existing Public Rights of Way
- Overhead powerlines (& easement)

SUBJECT TO FURTHER TECHNICAL INPUTS

Rev	Date	By	Description
C	19.12.2023	JC	Masterplanning Updates 23
B	02.07.2021	JC	Minor client updates
A	25.06.2021	JC	Amended with technical inputs

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Project	Land at Newton Manor Lane RUGBY
Title	Concept Masterplan
Client	Clarion Homes Group
Scale	1:2500 @ A2
Date	April 2021
Drawing No.	CSA/5392/105

Drawn	JC
Checked	RR
Rev	C



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