

Development Strategy
Rugby Borough Council
Town Hall
Evreux Way Rugby
CV21 2RR

Gladman House
Alexandria Way
Congleton
CW12 1LB

2nd February 2024

Dear Sir/Madam,

RE: Rugby Local Plan Issues & Options

This letter is submitted by Gladman Developments Ltd (Gladman) in response to the Rugby Local Plan Issues & Options consultation (I&O).

Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.

National Planning Policy

In December 2023 a new NPPF was released that now includes changes to how housing figures should be derived, address issues in the operation of housing delivery and supply tests and several other elements. However, the Government has reiterated its commitment to delivering 300,000 homes a year, with the changes focussed on increasing housing delivery.

Rugby Local Plan

At this early stage in the plan-making process, we do not wish to comment on each of the identified policy topic areas; however, we reserve the right to do so in future consultations.

Nonetheless, it is important to remind the Council that any policy requirements relating to, for example, climate change, biodiversity net gain and open space provision, particularly where a higher standard than that required by current or emerging legislation is sought, must be robustly evidence based and not make development and the whole plan unviable.

Our focus for the remainder of this representation is on Chapter 9 'Land for Housebuilding' of the I&O document.



31. How many homes should we be planning for? (a) Minimum local housing need (b) The HEDNA 2022 need (c) Other (please specify)

As a **minimum** Gladman believes that Option B) the HEDNA 2022 should be used but we do have wider issues with the way the HEDNA 2022 has disregarded the urban uplift for Coventry and so would urge the Council to consider a higher figure than HEDNA as an **Option C).**

Paragraph 61 of the NPPF requires that in order 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. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. 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'.

With the HEDNA, Coventry Council are intending to remove the 35% Urban Centres uplift. Notably, this approach is contrary to the Council's own evidence base in the HEDNA which utilises the SM framework and applies the 35% Urban Centres uplift in deriving the recommended OAHN for the city. With reference to the 35% uplift, the Council state "the figure is not justified and appears entirely arbitrary, having no relevance to addressing local need." No evidence or justification is given for this position other than that the Council 'does not agree' with it.

The 35% uplift is a Government-led 'policy-on' approach to ensure that cities are the focus of development, and that the Government can meet its objective of 300,00 new homes each year. Gladman disagrees with the HEDNA 2022 and the way Coventry Council seek to contest this policy-on approach through their Local Plan Review. Ultimately, Gladman contend that as one of the largest urban authorities in the country, Coventry must play its part in resolving the housing crisis that exists nationally and contributing towards ensuring that the Government's target of delivering 300,000 homes per annum by the mid-2020s is met and should that need be unable to be met within their plan area then its neighbouring authorities, such as Rugby,

should work proactively to distribute that unmet need. Gladman consider that the true assessed housing need for Coventry lies somewhere between 1,964dpa and 2,529dpa. Given the tight city boundary and that the Council has historically been unable to meet its needs in full, it is highly likely that there will be significant unmet housing needs arising.

This is an issue Gladman have raised with Coventry directly in their Local Plan Review Issues & Options consultation. Gladman therefore consider it essential that as a neighbouring authority Rugby should engage in ongoing discussions together with the other Warwickshire authorities to guarantee there is a robust strategy for ensuring that the anticipated unmet housing needs stemming from Coventry are met in full within the plan period.

It is pertinent to note neighbouring authorities in the West and East Midlands, who are also subject to this uplift, have sought to meet these needs. For example:

- Birmingham's recent 'New Local Plan 2020-2042 Issues and Options' highlighted that the Council would not depart from the SM and the 35% uplift.
- Leicester City has also accepted the 35% uplift and worked with the wider Leicester and Leicestershire Housing Market Area authorities to address the unmet housing needs arising from the city through the Duty to Cooperate.

We would therefore respectfully suggest that whilst the Option B) HEDNA 2022 figure should be planned for as a minimum, the HEDNA 2022 departs from National Policy and the approach taken by other midlands authorities and therefore a higher housing figure for Rugby as an Option C) should be considered.

Gladman support the approach of the Council of incorporating a buffer or contingency of at least 10%. This would assist the Council in maintaining a continuous supply of housing over the future plan period and safeguard against delays and non-delivery of sites.

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

The locations listed as being potentially suitable for new housing appear to be logical choices and Gladman has no further comments to make at this time on the settlements chosen.

Gladman do suggest that Council should be seeking to allocate a range of sites across the settlements identified within the district, with a preference for large-scale residential sites of

approx. 200-300 dwellings which would be able to be delivered quickly and contribute to boosting the supply of housing as well as delivering much needed affordable housing at a quicker rate in comparison to larger SUE sites which take a considerable length of time to come forward.

We trust that our comments are of assistance and would welcome the opportunity to discuss them further.

Your faithfully