

Our Ref: P8107/SS
Date: 1st February 2024

Development Strategy
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Dear Sir / Madam

Harris Lamb Planning Consultancy has been instructed by Taylor Wimpey UK Limited (TW) to submit this representation to the Issues and Options consultation in relation to the Rugby Local Plan review. We have reviewed the consultation document and the supporting evidence base and respond to the relevant questions from the consultation document below.

7. CLIMATE CHANGE POLICIES

Question 21 - *Should we adopt a minimum tree canopy policy for new development?*

No. Taylor Wimpey UK Limited acknowledge and support the benefits of protecting and delivering trees as part of a residential development. However, they consider that this should be considered on a site-by-site basis with consideration of the unique constraints and opportunities presented by that site.

The protection and provision of trees in this way is already covered under a range of different policy objectives. This includes Biodiversity Net Gain, tree lined streets in the National Planning Policy Framework (NPPF) and general national design policies and guidance. Borough wide minimum requirements that do not allow for the unique constraints and opportunities presented by a site are not consistent with the prevailing policies and guidance, and do not allow the flexibility often needed to deliver schemes.

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Question 22 - *Should we identify priority locations or allocate sites for biodiversity net gain for sites which are unable to provide all the net gain on site and, if so, where?*

Taylor Wimpey UK Limited support the council identifying sites to provide net gain where this cannot be achieved on site. This will prove invaluable in the deliverability of certain sites and is considered a pragmatic solution to a challenge shared by everyone across the development industry.

Locations for these sites should be focused on sites which currently have limited ecological interest, and which can provide the type of habitats that are anticipated could be needed to support the proposed locations for growth in the emerging local plan. Ensuring the sites identified are currently of limited ecological value will mean there is greater scope to secure enhancements on them, and this will be a more efficient way to deliver the units that could be needed.

Question 25 - *We are considering requiring all new residential developments to be net zero. Do you agree?*

No. Taylor Wimpey UK Limited support the provision of sustainable development, however, the Government has made it clear that their preferred vehicle for achieving this is through Building Regulations. Changes in Building Regulations are already planned to achieve this and there is no need to replicate other legislation in a local plan policy.

9. LAND FOR HOUSEBUILDING

Question 31 - *How many homes should we be planning for?*

(a) Minimum local housing need

(b) The HEDNA 2022 need

(c) Other (please specify)

Taylor Wimpey UK Limited (TW) consider that of the two figures currently presented, the Standard Method (506 dwellings) and the HEDNA 2022 (735 dwellings), that the HEDNA better reflects the local evidence base when it comes to providing the right volume and mix of homes. However, TW considers that the evidence base clearly supports a higher housing requirement than either of these figures to support the economic growth aspirations of the area, deliver the required affordable homes and provide the right balance of sites to meet the wider objectives of the plan, including supporting the sustainability of the Main Rural Settlements. TW therefore encourage Rugby Borough Council to consider planning for more homes to ensure these objectives are met for the benefit of local people.

Affordable Housing Need

The HEDNA sets out that the net affordable housing need identified for Rugby across the plan period is 495 dwellings per annum. Consequently, even with a housing requirement of 735 dwellings per annum as proposed by the HEDNA, the net affordable housing need would equate to 67% of the annual requirement, which would not be viable and not provide the market homes also needed. To meet the affordable housing need identified, more homes need to be planned for.

TW consider the significant need for affordable homes in Rugby emphasises the need to progress a higher housing requirement and this approach is supported by Paragraph 61 of the NPPF.

Economic Growth

The HEDNA identifies Rugby second only to Stratford-on-Avon in terms of its need for new employment land. It is also well placed to making a notable contribution to the strategic B8 sites, which is identified as a separate need.

Economic growth and housing delivery often go hand in hand, and TW would encourage Rugby Borough Council to review how many homes are needed to support the economic aspirations of the plan.

Meeting Coventry's housing need

TW consider it would be prudent for Rugby Borough Council to speak with Coventry City Council to see if they require any assistance in meeting their housing requirement. The exact number of homes needed to assist Coventry in meeting its needs will be determined through its local plan review, but past experience has taught us that even with the lower housing requirement identified by the HEDNA, that it is highly likely that Coventry will need the support of the adjoining authorities, including Rugby, if its housing need is going to be met. Any additional houses identified through these discussions should be added to the housing requirement in the emerging local plan.

Green Belt release

When considering the impact of the recent changes to the NPPF on the housing requirement for Rugby, it is worth remembering that all of Rugby Borough is not in the Green Belt. Consequently, whilst the latest version of the NPPF makes it clear there is no requirement to release Green Belt to meet the housing need identified, TW does not consider this justifies a lower housing requirement for Rugby Borough, because there would still be non-Green Belt land available to deliver these homes.

In practice, however, the reliance solely on non-Green Belt sites is not particularly desirable for several reasons, and TW consider a more pragmatic approach would be to continue to plan for the homes needed and to distribute these in the most sustainable way taking

account to the size and location of settlements within the Borough. TW are confident that a case for exceptional circumstances would exist for such an approach, which would revolve around meeting the housing need identified, securing a higher delivery of much needed affordable housing, and securing a more sustainable distribution of development that would support the Main Rural Settlements that form an important role for residents that live in and around them.

Question 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?*

Stretton on Dunsmore

Taylor Wimpey UK Limited (TW) support the continued role of Stretton on Dunsmore as a location to provide housing growth to support the role of this settlement as a Main Rural Settlement.

Stretton on Dunsmore continues to form an important location to support the residents within and surrounding it, and continues to support the services and facilities to support additional housing development, including:

- Bus service
- Doctors Surgery
- Primary School
- Nursery
- Shop and Post Office
- Church
- Scouts pavilion
- Skate Park
- Open space and play areas
- Village Hall
- Public House

TW own one of the sites allocated for housing at Stretton on Dunsmore (DS3.8) in the adopted plan, which now has planning permission. TW also control the land immediately to the west of the allocation, which would form a natural extension to the existing allocation / settlement. A submission to the Call for Sites has been made for this site, which we have called – Land to the North of Plott Lane, Stretton on Dunsmore.

Dunchurch

Dunchurch is also a Main Rural Settlement as identified in the adopted plan and a location to deliver housing. Dunchurch continues to have all the services and facilities needed to support new homes, including:

- Bus service
- Doctors Surgery
- Primary School
- Nursery
- Shop and Post Office
- Café, Florist, Hairdresser, Barbers, Coffee Shop, pizza and Chinese takeaways
- Church
- Scouts pavilion
- Service station
- Open space and play areas
- Community Orchard
- Easy access Draycote Water
- Village Hall
- Cricket Pitch
- Football pitches
- Allotments
- Public Houses

South West Rugby urban extension will link Dunchurch to Rugby, which will further enhance its sustainability credentials to deliver more homes. Dunchurch is outside of the Green Belt and well located to deliver additional homes.

TW support the continued identification of South West Rugby as a location to deliver housing in the Issues and Option document, but consider that Dunchurch can and should be considered as a location to deliver other stand alone housing sites that are capable of independent delivery.

TW own a parcel of land to the west of Sandford Way which could deliver 125 dwellings. They are also working with the surrounding landowners to deliver a larger site which extends further to the north and up to Coventry Road. Two separate submissions have been made to the Call for Sites for the site in TWSL ownership and one for the wider site. We have called these sites Land to the West of Sandford Way and Land to the South of Coventry Road.

Question 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?*

Taylor Wimpey (TW) query whether any reference to Policy M4(2) in policy is needed. The Government is consulting on whether to mandate M4(2) through Building Regulations and there is no need to replicate the provisions of other legislation in planning policy.

TW has no objection in principle to the inclusion of requirements for the provision of M4(3), but the requirement for this needs to be evidenced to demonstrate the need for this accommodation and subject to robust viability testing to ensure the cost of delivering this are properly accounted for.

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

The type of homes should in line with the prevailing evidence base and Taylor Wimpey (TW) consider that flexibility should be built into the policy to allow the mix to be assessed on a site-by-site basis, to reflect the location of the site and the latest housing evidence.

The consultation document does not refer to the Nationally Described Space Standards and TW would agree that there are no obvious signs that local circumstances demonstrate this should be a requirement. However, if the council does decide to consider NDDS, TW would remind the council that such a policy provision needs to be justified in accordance with the provisions of footnote 52 of the NPPF.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress its Local Plan, and I would be happy to discuss these issues in greater detail with you if that would assist.

TW would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use my contact details for future correspondence.

Yours faithfully,



[Redacted contact information]