

# **Land at Coventry Road, Wolvey Representation to Rugby Local Plan Review Issues and Options**

St Philips Land Limited

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**LICHFIELDS**

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# Appendices

Appendix 1 Site Location Plan

## 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 St Philips.

1.2 We focus on the strategic matters that are contained within the IO consultation document and relate specifically to St Philips’ land interests at Coventry Road, Wolvey (“the Site”). A Site Location Plan is appended to these representations (Appendix 1). A separate Call for Sites submission is also made. A Vision Document for the site is being prepared and will be submitted in due course.

1.3 St Philips are seeking to secure the strategic allocation of the site for residential development through the new Local Plan and are seeking to work constructively with Rugby Borough Council (“the Council”) to ensure that the site can deliver new housing to meet the identified needs.

## **Plan Making To Date**

1.4 Rugby Borough Council are in the early stages of preparing their new Local Plan. On 14<sup>th</sup> 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 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 Plan to adoption. Following Issues and Options consultation, the next stage of the Local Plan review will be the Preferred Options (Regulation 18) consultation in July 2024, Pre-submission consultation in January 2025, submission for examination in June 2025 and adoption by the end of 2026.

## 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 consultation 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 Borough, highlighting that the Rugby housing requirement is underpinned by the Local Housing Need (“LHN”) figure generated by the standard method.

2.6 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 plan period to 2041 or c.16,000 dwellings to 2050.

2.7 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.

2.8 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)*

2.9 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.

- 2.10 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.
- 2.11 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.<sup>1</sup> Therefore, an uplift to LHN can be applied when supported by evidence.
- 2.12 St Philips considers that a housing requirement greater than the LHN should be adopted and does not support option (a) of Question 31.
- 2.13 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 would justify a deviation from the LHN figure.
- 2.14 St Philips are supportive of option (b) which would plan for the needs identified in the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA).
- 2.15 As acknowledged within the IO, subsequent to the release of the 2014-based projections, 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)
- 2.16 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.
- 2.17 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. Notably, in regard to housing need, the Council have applied a 10% supply buffer which will increase the level of supply on the basis that some sites may fail to come forward as intended.

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<sup>1</sup> PPG ID: 2a-010

- 2.18 The total housing need up to 2041 would be between 10,120 (Standard Method) and 14,700 (HEDNA). The total need to 2050 would be 14,674 (Standard Method) and 21,315 (HEDNA) respectively.
- 2.19 Based on available supply, a shortfall remains of between 3114 and 8,101 dwellings based upon the needs defined through the HEDNA.
- 2.20 St Philips 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 PPG<sup>2</sup> 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.
- 2.21 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 a 20% uplift to housing need. The HEDNA has also acknowledged the severity of the issue and has applied a 22% uplift to the household growth figure.
- 2.22 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.
- 2.23 Whilst St Philips 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.

## **Coventry’s likely level of Unmet Housing Need**

- 2.24 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.
- 2.25 In December 2020, the Government revised the Standard Method following the ‘Changes to the current planning system’ consultation. The PPG<sup>3</sup> 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

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<sup>2</sup> PPG ID: 2a-024

<sup>3</sup> PPG ID: 2a-004



2.26 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., 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.

2.27 As a part of the Coventry Local Plan Review, which was subject to an Issues and Options Consultation in 2023, Coventry subsequently reported on an updated evidence base, and prepared a ‘Housing and Economic Land Availability Assessment’ (2023) [HELAA]. It is understood that the HELAA was prepared within the context of the jointly prepared Housing and Economic Land Availability Assessment Methodology in September 2021.

2.28 Crucially the HELAA updates the Council’s information in respect of available housing land supply and sets out the projected delivery of new housing between 2021/22 and 2040/41. The purported housing land supply comprises several components, including:

Figure 2.1 Coventry’s components of housing land supply

Housing land supply	Number of Homes
Past net completions	3,818 (2021 /22 monitoring year)
	1,620 (2022 / 23 monitoring year)
Call for brownfield sites	1,200 (approx.)
Sites with planning permission (includes those under construction but not completed)	11,914
Local Plan allocations – remaining capacity	3,151
City Centre Area Action Plan Remaining Allocations	455
Windfall	3,000 (2026 onwards)*
<b>Total</b>	<b>25,158**</b>

Source: Table 5, Coventry IO Consultation

2.29 As such, as of 31st March 2023, Coventry has confirmed a supply of 25,158 dwellings. As is shown above, a large proportion of this supply is already permitted; albeit, a large majority of this existing permitted land supply relates to flatted PBSA or flatted schemes on previously developed land.

2.30 The HELAA supply also indicates that c.3,000 windfalls would occur between 2026 and 2041, equating to an annual rate of 200 dpa. This is, of course, an optimistic position, which assumes that existing trends will continue beyond 2031. For example, it may become apparent that there is a lack of windfall sites suitable for redevelopment in the future because brownfield land is, by its nature, diminishing in supply, which would consequently impact the likely Local Plan windfall completions. Notwithstanding this, at present, the above supply represents a reasonable starting point for considering the likely unmet housing need in Coventry up to 2041.

2.31 The Housing Topic Paper supporting the Coventry Local Plan identified three scenarios to explain the level of housing need as follows;

- “Scenario 1 is the Government’s Standard Method calculation. This is the ‘default’ method set by Government and utilises the 2014 Population Projections, which have

*been shown to be erroneous for Coventry, significantly overestimating future need. This error has been admitted by the office for National Statistics. This method gives Coventry a total minimum need of 63,760 new homes over the plan period.*

- *Scenario 2 is the HEDNA figure. This uses the more accurate 2021 Census data as an input to the calculations instead of the erroneous 2014 figures. This gives a need of 39,280 new homes over the plan period for Coventry.*
- *Scenario 3 is the HEDNA figure but with the 35% uplift removed. The Government has applied this uplift to England's 20 largest cities, but the figure is not justified and appears entirely arbitrary, having no relevance to addressing local need. Removal of the 35% uplift gives a need of 29,100 new homes over the plan period."*

2.32 The above suggests that there would be a minimum shortfall of c14,000 dwellings if the HEDNA OAHN was utilised or c39,000 dwellings based upon the Standard Method plus 35% uplift.

2.33 It is important to note that the NPPF and PPG are clear that the LHN figure generated by the SM is the minimum starting point (i.e., a 'policy-off' housing need) and it very well may be that Coventry needs to explore further uplifts to these minimum figures. Therefore, these shortfalls should be seen as the minimum level of unmet housing need, which does not take into consideration whether higher levels of growth would be required.

2.34 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.

2.35 Paragraph 67 of the NPPF is relevant and sets out that;

*"Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. 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. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations<sup>33</sup>. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in."*

2.36 In this regard, St Philips 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.

2.37 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.

2.38 In this regard, as the Council will be aware, at the very heart of the approach adopted by the C&W HMA authorities to distribute Coventry's unmet housing needs through the 2017

MoU was a functional relationship (e.g., migration and commuting) that also attributed economic uplifts to individual authorities. 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.

- 2.39 Notably, other authorities have drawn on the HMA's Functional Relationship approach. Indeed, to help address the unmet housing needs of GBBCHMA, North Warwickshire considered the proximity, connectivity, and strength of functional inter-relationships with Birmingham in determining its contribution towards addressing the unmet housing needs of the GBBCHMA. This was similar to the approach taken by C&W HMA and, again, was an approach that the Inspector supported. More recently, in considering how the unmet housing needs of Leicester – another city subject to the 35% urban centres uplift – could be addressed throughout the Leicester and Leicestershire Housing Market Area [LLHMA], a similar functional relationship approach was utilised. Albeit this approach differed slightly and drew on considerations of economic alignment and market capacity. This approach has also been endorsed in the Stratford-on-Avon Core Strategy (2017) Inspector's Report.
- 2.40 In the absence of this, there is a very real risk that Coventry's housing needs may not be fully met, that the DtC cannot be sufficiently evidenced and that the Borough Plan Review may be found 'unsound'.
- 2.41 In summary, St Philips 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)). St Philips 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 to accommodate a proportion of Coventry's unmet need.
- 2.42 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.
- 2.43 St Philips considers that the land at Coventry Road in Wolvey would provide a suitable site to assist in meeting the housing needs set out above within Rugby Borough.

### **32. Would you support RBC both improving existing and developing new social and affordable housing (like the regeneration of Rounds Garden and Biart Place)?**

- 2.44 The updated NPPF remains clear that:
- 2.45 *"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).
- 2.46 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)"*.

- 2.47 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.
- 2.48 In light of this identified need, St Philips considers that an uplift to the LHN figure would be considered to be sound at Local Plan examination.
- 2.49 There is evidently a substantial level of demand for affordable housing within the area, and on this basis, St Philips are 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 new residential developments.

### **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?**

- 2.50 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. The Council have not yet put forward a proposed spatial or development strategy for the borough over the next plan period. St Philips reserve the right to comment on this matter as the new Local Plan progresses.
- 2.51 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.
- 2.52 St Philips considers that the growth of Main Rural Settlements including Wolvey should form an important part of the spatial strategy. The NPPF emphasises importance “*on the need to support economic growth and productivity*” (Paragraph 85) and St Philips believes that supporting growth at these locations would help achieve this objective.
- 2.53 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. St Philips considers that the proportionate growth of Main Rural settlements will play a key role in fulfilling this requirement.
- 2.54 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.

- 2.55 In this respect, it will be critical that the Council adopts a Site Selection Methodology to inform the assessment of sites through the Housing Economic Land Availability Assessment that places accessibility, access to and the proportionate delivery of appropriate community and social facilities, achieving a reduction in carbon and achieving bio-diversity net gain as a priority.
- 2.56 St Philips considers that it will be important to focus on selecting the best performing sites to ensure the most sustainable locations for growth are achieved, rather than focusing on the “policy on” option of protecting the Green Belt or other designation over and above achieving sustainability.
- 2.57 St Philips 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.
- 2.58 As such, St Philips considers that there is limited potential to accommodate all of the housing need for Rugby and any apportionment of growth from Coventry without release of land from the Green Belt.
- 2.59 In this context, St Philips is promoting the land at Coventry Road, Wolvey for residential development. Development on the edge of Wolvey 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 Site Location Plan is included at Appendix 1 and a separate Vision Document will be prepared and submitted in due course.

### **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?**

- 2.60 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”*
- 2.61 St Philips 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.
- 2.62 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.
- 2.63 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).

2.64 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.

2.65 However, St Philips 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”.*

2.66 Although the NPPF supports the implementation of additional standards when justified by evidence, St Philips considers that there should be a more flexible approach and that the viability of implementation on a site-by-site basis should be accommodated within policy wording. It should be recognised that 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.

2.67 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”.*

2.68 In addition, the PPG<sup>4</sup> sets out:

2.69 *“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”.*

2.70 In consideration of the above, St Philips 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, St Philips consider there should be 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.

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<sup>4</sup> PPG ID: 56-020

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

2.71 The NPPF states:

2.72 *“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)

2.73 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:

Figure 2.2 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)

2.74 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.

2.75 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.”*

2.76 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.”*

2.77 St Philips 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.

2.78 As established in the ‘William Davis Ltd v Charnwood Borough Council’s judgment, St Philips 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

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

to this through the submission of evidence to support individual planning applications where this is necessary.

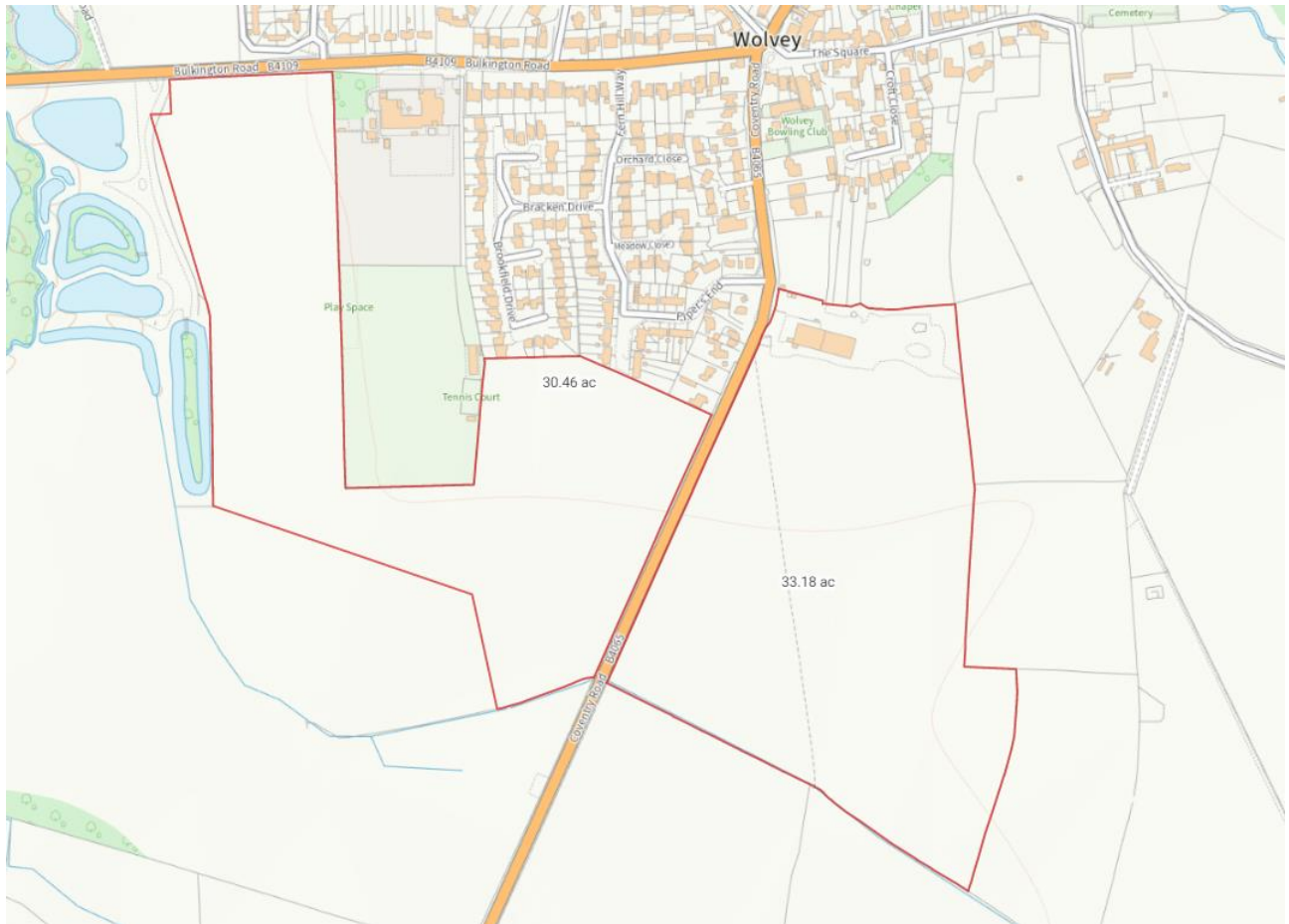
- 2.79 Although, a borough wide need has been identified, St Philips supports the Council's acknowledgement of site-specific constraints. It would be an unsuitable strategy to apply a prescriptive mix to all development sites now as individual sites may not come forward for several years, by which time 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.
- 2.80 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.
- 2.81 In summary, whilst St Philips 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 and which should be able to form part of subsequent planning applications on a case by case basis supported by the policy wording.



### **3.0 Land at Coventry Road, Wolvey**

- 3.1 As set out in Section 1.0 of these representations, St Philips is promoting land at Coventry Road, Wolvey for residential development. The extent of the site at Coventry Road is illustrated on the attached Site Location Plan (Appendix 1). A Concept Masterplan and Vision Document are being prepared and will be submitted in due course to supplement the Call for Sites Submission.
- 3.2 The site, encompassing an area of circa 12ha to west of Coventry Road and 13ha to east of Coventry Road, is currently used as agricultural land. The site is accessed via Coventry Road, which runs along the boundary of the site. The site adjoins the built-up area boundary of Wolvey offering a suitable opportunity for a medium sized extension to the settlement.

# Appendix 1 Site Location Plan





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