

Representations on behalf of St Modwen Homes

Rugby Borough Local Plan Review – Issues and Options

January 2024

- 1.1 The following sets out comments on behalf of St Modwen Homes to the Rugby Borough Local Plan Issues and Options Consultation. The comments focus on the need for housing and employment land and respond to those questions set out in relation to the matters in respect of land for employment uses and land for housebuilding. The comments here are also specifically provided in the context of St Modwen Homes land interests at Brownsover Road, Rugby. The land was previously proposed to be removed from the Green Belt as part of the current Local Plan as it was concluded the site did not contribute to Green Belt purposes. Those conclusions remain valid today and the site has potential to provide for a high quality residential development and has been put forward in the concurrent “Call for Sites” consultation.

Land for Employment Uses

How much employment land should we be planning for?

- 1.2 In summary;
- **The NPPF seeks to ensure that the planning system does all it can to support economic development and growth.**
 - **Policies should support specific sectors including logistics and Rugby is strategically located to attract such inward investment**
 - **The HEDNA identifies levels of growth primarily based on past trends, but the Plan should provide for at least this level of growth, and should aim to surpass historic levels of economic development and employment growth.**
 - **A range of sites should be planned for including for a range of different types of industry.**

- 1.3 The National Planning Policy Framework (NPPF), sets out a definition of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives which are independent but need to be pursued in mutually supportive ways so the opportunities can be taken to secure net gains across each of the different objectives. Whilst there are social and environmental objectives to sustainable development, there is equally an economic objective which seeks to ensure the planning system helps to build a strong responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.
- 1.4 Chapter 6 of the Framework is titled “Building a strong, competitive economy”. It advises that planning policies and decisions should help create the conditions in which business can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 1.5 In respect of planning policies, the framework advises that these should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth having regard to local industrial strategies and other local policies for economic development and regeneration. Inward investment should match the strategy and meet anticipated needs over the plan.
- 1.6 The Framework also encourages planning policies to recognise and address the specific locational requirements of different sectors this includes making provision for storage and distribution operations at a variety of scales and in suitable locations.
- 1.7 Policy from Government is therefore clear that the Local Plan for Rugby should be one which positively and proactively embraces growth, encouraging and providing opportunities for inward investment and economic development.
- 1.8 The Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA 2022), identifies such economic growth needs. It sets out three components of future need for employment land projecting forward past trends for gross industrial and smaller warehouse floor space delivery. For strategic warehousing, again the requirement is a gross figure calculated through some consideration of past trends but also a modelled projection of need with regard to replacement of existing stock and projected growth in freight traffic. Rugby is a location which is well positioned within the region with enviable

highway and rail connected infrastructure which makes it highly attractive to logistics and the Borough Plan should recognise and accommodate this. The local plan should meet full needs for employment land take an optimistic and proactive view on employment land needs. It should push further than merely projecting and accommodating past trends, but should plan for enhanced growth, surpassing past trends and facilitating all options for economic growth.

What type of employment land should we be planning for?

- 1.9 It is essential that the plan provides for a range of employment types and sizes of sites suitable to accommodate a range of employment opportunities. The HEDNA already gives consideration to different employment sectors and this provides a starting point to differentiate need. Maximising the range and types of sites will positively support inward investment. Choice variety in provision across all sectors is essential to encourage inward investment and the plan should work to accommodate full gross requirements.

Land for Housebuilding

How many homes should we be planning for?

- 1.10 In summary;
- **It remains a key aspect of Government policy to significantly boost the supply for land for housing**
 - **The Framework requires Plans to identify and provide for a sufficient amount and variety of land for housing to ensure all needs are addressed.**
 - **The aim is to meet as much of the area's identified housing need as possible.**
 - **The standard method is only a starting point in identifying needs**
 - **The HEDNA provides for a more reasoned assessment of need, taking into account local demographics**
 - **The HEDNA is higher than historic annual build averages, higher than the previous local plan requirement and higher than the standard method, so more aligns to government policy to boost supply**

- **A higher housing requirement will address current housing affordability and provide for more affordable housing when the need for affordable homes is significant.**
- **A range of site sizes and locations are required to meet needs, including smaller and medium sized sites as well as large scale developments**
- **Modest adjustments to Green Belt boundaries on the edge of Rugby should be considered as part of the plan review in order to identify the most sustainable locations particularly for smaller and medium sized sites.**
- **Rugby should work positively with the other HMA authorities in order to address any unmet needs of Coventry.**

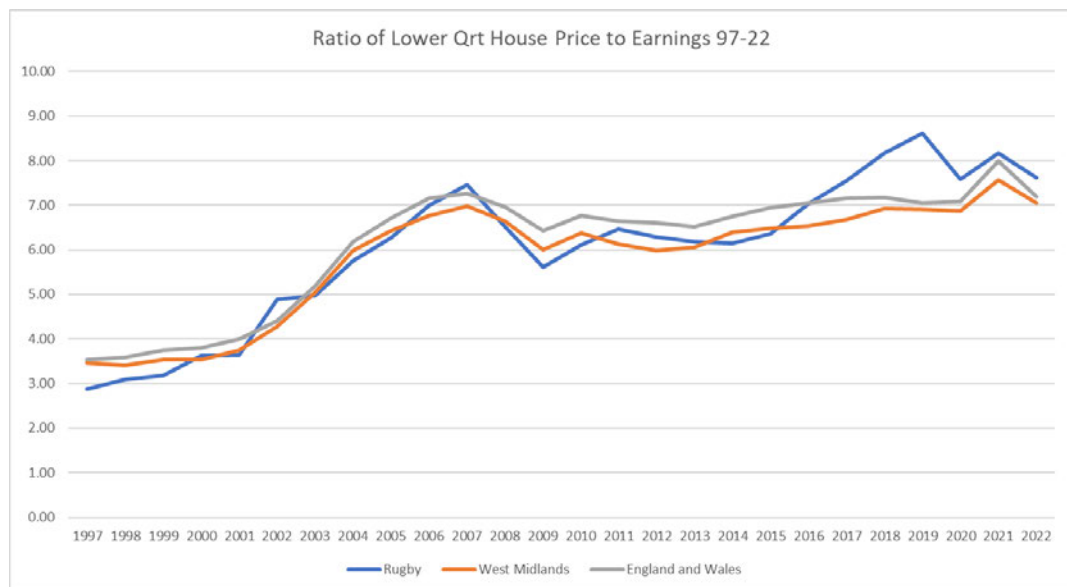
1.11 Again, with reference to the Framework definition of sustainable development, it confirms that achieving such sustainable development means that the planning system has three overarching objectives to pursue. One of those objectives is a social objective to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of the present and future generations.

1.12 Chapter 5 of the framework is titled “Delivering a sufficient supply of homes”. Although the Framework has been updated recently, it still remains a clear objective of Government planning policy to significantly boost the supply of homes. The Framework states that in order to support this objective, it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed. The overall aim in delivering a sufficient supply of homes should be “to meet as much of the area's identified housing need as possible” including with an appropriate mix of housing types for the local community. The government remains committed to identify and meet as much as possible of the local housing needs for the area and the Rugby Borough Local Plan should do the same.

1.13 In order to determine the minimum number of homes needed, the plan should be informed by a local housing need assessment. The framework advises this should be conducted using the standard method in the national planning guidance, but this is an advisory “starting point” for establishing the housing requirement for the area and that there may be exceptional circumstances which justify an alternative approach to

- assessing housing need. In which case such an alternative approach should also reflect current and future demographic trends and market signals.
- 1.14 The Framework also advises that 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. In this respect, Paragraph 61 points directly to the “positively prepared” test of soundness (in particular) as set out at Paragraph 35 of the Framework. Plans are “positively prepared” if they provide a strategy which “as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development” (our emphasis). This is important for Rugby if they are to positively work with their neighbours, including Coventry, to understand their needs and proactively assist in supporting their needs.
- 1.15 The latest housing requirement for Rugby calculated using the standard method is 506 homes per year. However, the six Coventry and Warwickshire local authorities commissioned the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA, 2022). It provides an alternative housing need figure and uses the most up-to-date data available to produce a projection for future population growth and growth in the number of households. It also applies the affordability uplift used in the government standard method to give an alternative housing need figure. The HEDNA’s annual housing need figure for Rugby Borough is 735 homes per year, a figure clearly higher than the government standard methodology figure advocated as a starting point in the Framework. Utilising the HEDNA figure would better identify an appropriate level of need for the local plan requirement. Its higher figure is in part justified by its better understanding of Coventry’s population and potential issues surrounding its overestimation which the ONS has acknowledged, It is also a figure which better aligns to the Framework’s aims to significantly boost the supply of housing, noting that the standard method figure would see a lower annual provision than the current Local Plan (605 dwellings per annum) and a lower annual provision that is currently on average being delivered (601 since 2001 or 673 since 2011). The standard method would not represent a boost to supply.
- 1.16 The HEDNA also better aligns with the objectives of sustainable development ensuring that a sufficient number and range of homes is provided to meet needs. This is

particularly so in respect of affordable housing where the main supply in affordable housing is through the delivery of open market developments. Positively embracing a higher need for housing will also deliver a greater level and provision of affordable housing. This is noting that Rugby has seen a significant rise in its affordability ratio of house price to earnings and where affordability is worse than the regional or national average.



- 1.17 The affordability to buy properties have been progressively worse since records began in 1997. The HEDNA identifies a significant need for affordable housing which is considerable particularly social and affordable renting. More homes are needed to improved affordability. More homes are needed to deliver more affordable homes. Adopting a lower Local Plan requirement will only adversely impact on housing affordability and will deliver fewer affordable homes.
- 1.18 Whilst there are a range of methods by which additional social and affordable housing could be delivered, a key delivery route is through the delivery of section 106 affordable housing as part of market housing developments. It is essential that the plan includes for a full assessment of housing need in order to maximise the delivery of affordable housing as part of open market developments.
- 1.19 It is essential that the new Plan provides for an appropriate level of housing. Government policy is advocating a step change in the delivery of new housing. There are significant negative impacts which would result from adopting low levels of housing growth and these must be recognised, not least the significant impact on housing

affordability and increased house prices by a lack of supply. Affordability of housing is a factor affecting the Housing Market Area and the need for more affordable housing is well documented in the HEDNA. In addition to significant impacts on affordability, a low level of housing growth would not meet housing needs, would not support the economic growth aspirations essential to the plan. It is important for the emerging Local Plan to adopt the HEDNA to deliver a higher level of growth. It is also important that unmet need from the wider HMA is suitably accommodated, to address household suppression and to address full affordable housing need.

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?

- 1.20 Rugby has had some success in the past in delivering large scale developments and opportunities exist as part of the local plan review to identify further opportunities for such schemes. These can sit alongside a range of smaller and medium size sites which promote delivery and provide for a variety and choice of sites in the market.
- 1.21 Paragraph 70 of the Framework states that small and medium size sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. Providing these alongside larger scale developments will provide a complementary mix of housing opportunities within the Borough.
- 1.22 Aligned to the identification of smaller and medium sized sites for housing should be the opportunity to reconsider and refine Green Belt boundaries. Opportunities around the main Town of Rugby represent the most appropriate location for smaller and medium sized sites to be identified, particularly where they are located in proximity to the Town's main employment areas. This should include a small scale review of Green Belt boundaries to identify the most sustainable locations. Some small scale sites could be removed from the Green Belt where such small sites do not contribute to the purposes of including land within the Green Belt. Small scale adjustments to the Green Belt boundary around Rugby should form part of the local plan review without compromising the overall strategic objectives of the Green Belt or the main purposes to which it aligns.
- 1.23 A clear example of this is St Modwen Homes site at Brownsver Road. It is being promoted for a residential development allocation through the Call for Sites. It is a parcel of land which was previously proposed to be removed from the Green Belt as part of the current Local Plan as it was assessed to not contribute to Green Belt objectives. These

conclusions however remain valid today and the Local Plan should include for a small scale review of Green Belt boundaries to allow for such sites to be removed from the Green Belt where they do not contribute to its purposes. The Local Plan should not be including land within the Green Belt which is not contributing to its purposes.

- 1.24 Equally the site is suitable for residential development. A Vision for the development of the site (attached) has been prepared and submitted through the Call for Sites. The site is sustainably located on the edge of main town of Rugby, close to amenities, services and facilities. It is also close to a major employment area, reducing the need to travel to places of employment. It is the type and scale of site which would complement the range and variety of sites in the Local Plan, alongside potentially larger scale opportunities.

