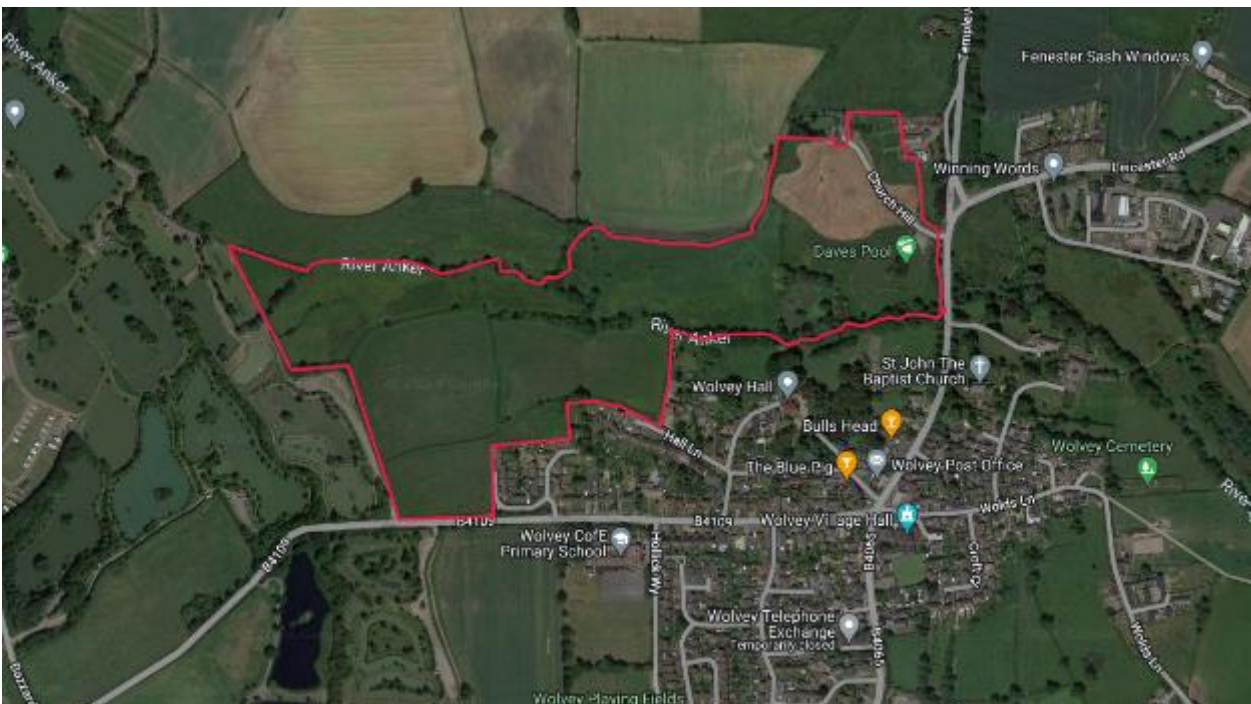


Response to the Rugby Local Plan Review Issues and Options Consultation

Land at Wolvey, Rugby

On behalf of Places for People

2nd February 2024



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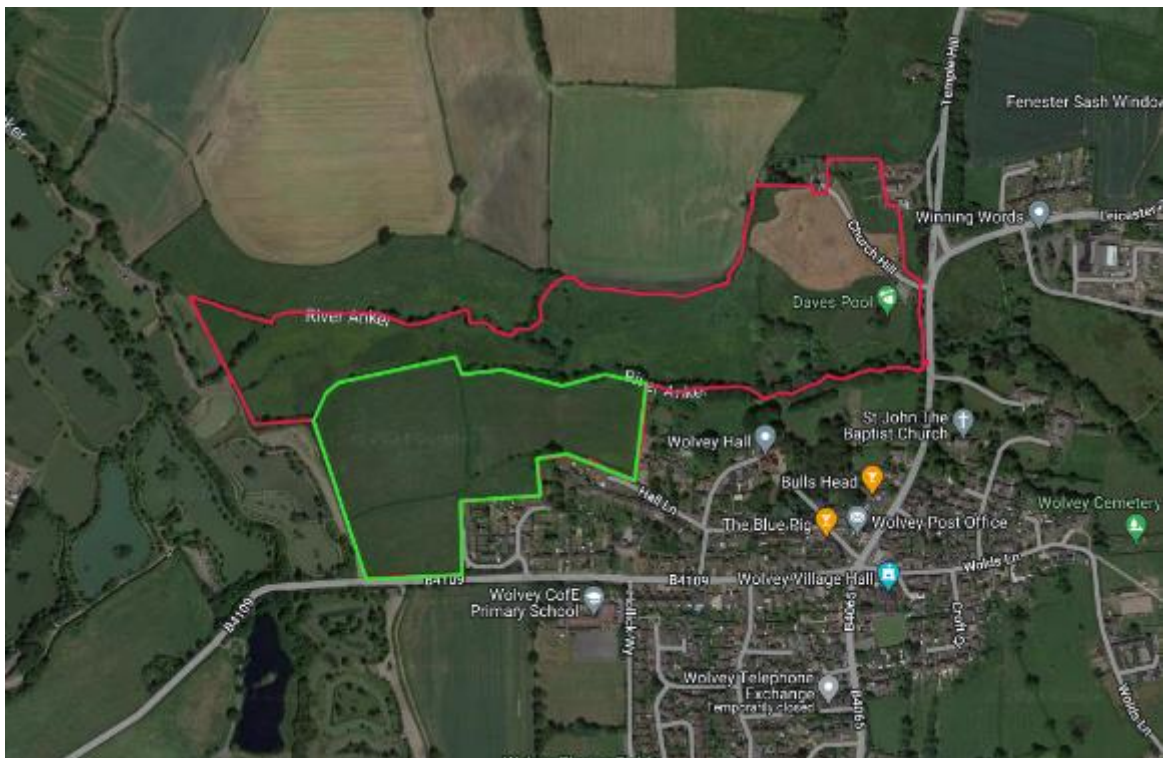
Version v2

Date: 2nd February 2024

1 INTRODUCTION

- 1.1 Thank you for providing an opportunity to comment on the Rugby Borough Council (herein referred to as “RBC” or “the Council”) Local Plan Issues and Options: 2023 Consultation (“Issues and Options”). Asteer Planning LLP (“Asteer”) act on behalf of Places for People (“PfP”) in relation to land to the north west of Wolvey, Rugby (“the site”).
- 1.2 As the UK’s leading social enterprise, Places for People has many facets to its business. We are one of the UK’s largest Registered Housing providers of affordable housing. We are developers of private and affordable housing, assisted retirement living, care homes, student accommodation and build to rent tenures. We are property managers of a number of leisure businesses across the country. Our ability to design, develop and manage genuinely mixed and sustainable communities ensures high quality developments for future residents and existing communities.
- 1.3 As a Registered Housing provider, we will remain embedded in the communities we create through the management of the affordable housing, creating a stable platform for the delivery of new and successful communities. This strength puts us in a unique position to be able to assist in the delivery of developments and gain support from local stakeholders as we have a vested interest in the legacy of the development.

Figure 1: Site Plan



- 1.4 The entire site area, identified by the red line in Figure 1 above, measures 19.09 hectares. For clarity, PfP is proposing to put forward only the southern extent of the site (“the promotion land”) for future residential development (outlined in green on the plan above), which measures some 7.05 hectares and forms a natural and logical extension to northern edge of Wolvey; between the existing urban area and the River Anker valley. The remainder of the site is not proposed for development and offers an opportunity to support the enhancement and improved accessibility to the Green Belt at Anker Meadows; and the potential for enhanced Biodiversity Net Gain (“BNG”) all of which would form a strong, defensible green northern boundary to Wolvey.
- 1.5 These representations provide PfP’s response to the Issues and Options consultation and seek to inform the emerging Local Plan spatial strategy and land allocations, by demonstrating the potential of Wolvey and the site to meet the future needs of the Borough. The site is also submitted for assessment as part of the Call for Sites process, and a completed Call for Sites proforma is included at **Appendix 1**.
- 1.6 The promotion land represents a logical and appropriate extension to Wolvey, with the ability to provide a defined and defensible northern boundary to the settlement. It is highly sustainable with access to a range of existing services and facilities, while providing an opportunity to deliver approximately 200 high quality family and affordable homes to meet the critical housing needs of the Borough. The site can deliver development that meets the highest standards of sustainable design, alongside new local amenity for the existing Wolvey community, while supporting significant enhancement to biodiversity and accessible community open space in the Green Belt as part of the wider site.
- 1.7 In summary, these representations provide:
- a) A response to the relevant Questions posed in the Issues and Options document; and
 - b) A review of the deliverability of the site/promotion land to support the site assessment process in the emerging Local Plan.
- 1.8 Places for People would welcome continuous engagement with the Council as the Issues and Options Consultation responses are considered and the preparation of a Draft Local Plan is progressed. PfP would be happy to discuss any feedback in relation to these representations, or in relation to the site itself.
- 1.9 PfP is assembling a professional design and technical team to prepare a deliverable and landscape led masterplan that will underpin the deliverability of the site and demonstrate

that the site is available, suitable and achievable to support a residential-led development that will help meet the needs of the Borough over the next Plan Period.

2 PFP RESPONSE TO ISSUES AND OPTIONS CONSULTATION

- 2.1 This section provides high level commentary on the key questions posed within the Issues and Options paper, as they relate to: the spatial strategy; the need for new homes; and, the site. We support the Council in its intention to fully review the Local Plan and our comments seek to promote a balanced spatial strategy across the Borough that will meet the housing needs of Rugby’s residents during the next Plan Period.

Question 31: How many homes should we be planning for?

Context

- 2.2 In order to deliver a forward-thinking Local Plan which adequately supports the needs of current and future residents, it is crucial that RBC plan pro-actively. The Borough has seen a significant population growth between 2011-2021 of 14.3%, which is more than double the population growth seen nationally (at 6.6%). ONS-data suggests that 59% of this growth came from within the UK, with RBC’s growth being the highest of any local authority in the West Midlands. This population increase places further stress on affordability in the Borough which is a critical issue, with the average house price being 7.17 times the average income in the Borough; suggesting an acute need for both new affordable homes alongside an uplift to the quantity of available homes altogether.
- 2.3 The Government’s standard method suggests a housing need of only 506 homes per annum in Rugby. This is significantly below the build rates achieved in the period 2011-2023, where the Borough has delivered 673 net new homes per year, and does not account for the Borough’s clear and acute need to address affordability. It is also significantly below the 735 dwellings per annum (“dpa”) suggested in the 2022 Coventry and Warwickshire Housing and Economic Development Needs Assessment (“HEDNA”) 2021-2041.
- 2.4 The current Local Plan recognises this, to an extent, setting an increased housing need figure at 620 dpa; however, the results of the most recent Housing Delivery Test (2022) suggest that a more ambitious approach should be considered, with the Borough delivering at 180% of its annual need between 2019-2022 (with 1,706 total homes required and 3,070 delivered); therefore demonstrating a significant demand for housing in the authority area.
- 2.5 Moreover, there are important material factors which suggest that the Borough should consider a higher housing need based on its characteristics, location and ability to support the growth potential of the region. These include:

- **Strategic location** - Rugby and Wolvey are strategically located within the West Midlands, in the heart of England and the Golden Triangle. They have excellent highways connectivity, being easily accessible from the M69, M1, M6 and M45 which provide access to the wider strategic motorway network, in addition to Wolvey being within close proximity to the A5. Rugby is also well-connected by rail on the West Coast Mainline, with links to Birmingham, Manchester and London.
- **Employment growth** – as set out in the Issues and Options paper and the HEDNA, the Borough has significant employment growth potential, with more than 600ha of strategic B8 land required across Coventry and Warwickshire. It is important that Rugby considers scenarios for accelerated employment growth, to support the economic future of the Borough and create jobs for existing and future residents. The synergy between employment and housing is well established and it is important that the Borough considers how any accelerated economic growth scenarios will be supported by deliverable market and affordable homes across the Borough.
- **Affordability** – as set out earlier, the Borough is becoming increasingly unaffordable. An uplift in housing need should be considered to alleviate this pressure and a spatial strategy that takes a positive approach to allocating viable and deliverable sites (that have the ability to deliver affordable housing) should underpin the new Local Plan.
- **Cross-boundary working** – the Borough should also ensure it fully considers cross-boundary co-operation during the preparation of the Local Plan, to ensure the wider needs of the region are considered. This is especially important when considering the need placed by the NPPF on certain cities (including Coventry) to include an urban uplift in their standard method calculation. Coventry have failed to apply this uplift, and as such, if they were to use the standard method to calculate their housing requirement, there would be an unmet need. Rugby has the potential and capacity to accommodate some of this unmet need through allocations in its emerging Plan which would provide significant benefits for the wider West Midlands region.

Recommendations

- 2.6 Adopting a ‘do-minimum’ approach and planning for delivery in accordance with the minimum local housing need would stifle the growth of the Borough, worsen affordability and force out existing residents over the next 20 years.
- 2.7 PfP recommends that, in answer to Question 31, neither the minimum local housing need nor the HEDNA should form the basis of the Borough’s housing need. The Council should

undertake a robust Housing Needs Assessment to underpin the draft Local Plan. This Housing Needs Assessment should consider the potential for accelerated growth scenarios based on the strategic location of Rugby, the potential for employment growth, current evidenced demand for housing, affordability, and affordable housing need uplift.

Question 32: Would you support RBC both improving existing and developing new social and affordable housing (like the regeneration of Rounds Gardens and Biart Place)?

- 2.8 The HEDNA and affordability indicators demonstrate an acute affordability crisis within the RBC area. PfP supports RBC developing new / regeneration schemes which are capable of delivering social and affordable housing, where it can demonstrate they are viable. However, it is important that the delivery of affordable housing in the Borough is also supported by demonstrably viable and deliverable sites across the Borough which can deliver affordable family homes. A balanced spatial strategy which distributes affordable housing growth across the Borough without disproportionately concentrating growth into one spatial area is critical to the successful implementation of an effective social and affordable housing policy through the emerging Local Plan.
- 2.9 The site in Wolvey offers a viable and deliverable opportunity to provide affordable housing, supported by PfP, which has significant experience in affordable housing delivery and management.

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

- 2.10 PfP fully supports the identification of Wolvey as a potential location for growth, and the identification of a geographical spread of locations across the Borough, that would promote a balanced approach to spatial strategy and land allocations.
- 2.11 Wolvey provides the only potential location for growth to north of the M6 and in the north of the Borough. This serves as an important growth area that can improve the Borough's northern connections to Nuneaton, Hinckley, and Leicester, and would ensure that the north of the Borough accommodates a level of growth that supports a balanced spatial strategy.
- 2.12 There are a number of key amenities within Wolvey which ensure its suitability to sustain further growth, while the development of the promotion land / site itself could present the opportunity to identify and deliver additional amenities to further improve the offer and

sustainability of the settlement. Wolvey also benefits from strong, defined natural constraints to the settlement which offer the potential to deliver new land allocations without compromising the integrity of the wider Green Belt.

- 2.13 The Adopted Local Plan directed significant growth towards the Rugby Urban Edge, with allocations totalling 13,300 units; compared to 490 units received in all the other settlements combined. A continuation of this trend in the emerging Local Plan could generate severe imbalances between the north and south of the Borough. Equally, a lack of investment in the main settlements outside of the Urban Edge will risk isolating the Borough from the wider West Midlands and Leicester if there is not sufficient provision to engender growth across the borough.
- 2.14 PfP recommend that a balanced spatial strategy is adopted that fully recognises the need for growth in the north of the Borough, and recognises the suitability of Wolvey to accommodate this growth.

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?

- 2.15 PfP supports the 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. However, this is not supported in isolation, as the Local Plan needs to show an understanding that ensuring a sufficient mix and tenure of homes within the Borough, also means ensuring a sufficient number of homes are delivered within the Borough. As such, it would be strongly suggested that the Local Plan accepts the additional Building Regulations as part of a wider push to deliver housing that meets a greater range of needs for a greater number of people.

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

- 2.16 As noted in paragraph 9.31 of the Issues and Options paper, it is important to emphasise that there needs to be flexibility in any policy which requires a specific mix or specialist housing in relation to a new housing development, in order to ensure any potential development is not suffocated by onerous policy requirements.

2.17 However, it is critical that viable and deliverable sites are identified across the Borough that have the ability to be flexible in delivering the type, size and tenure of new homes to meet the needs of the Borough.

Question 36: Are there any other issues or policies (not covered by the questions above) that we should cover in the new plan?

2.18 It is important that the role of the Green Belt is covered in the emerging Local Plan. To inform this, there needs to be a robust assessment of the Green Belt and the role it currently plays across the Borough. This also means consideration needs to be given for identifying suitable sites to be removed from the Green Belt in order to meet the housing and economic needs of the Borough.

3 LAND AT WOLVEY: A DELIVERABLE SITE

- 3.1 This section provides an initial review of the deliverability and suitability of the promotion land for residential development, supported by the Call for Sites proforma included at Appendix 1. As set out earlier, PFP is committed to assembling a full design and technical team to underpin the deliverability of the site as the Local Plan progresses; and to promote its merits through the full plan making process.

Strategic Context

- 3.2 When considering Rugby's strategic context, it is important to recognise the current sub-national geography, with Rugby forming part of a major functional economic geography that includes the Coventry and Warwickshire Local Enterprise Partnership, the 'Golden Triangle' employment region and the West Midland Combined Authority. This is a region of significant economic growth potential at the heart of the country and it is essential that the Rugby Local Plan and its spatial strategy is considered not in isolation, but in the context of this economic potential. The synergy between economic growth and housing is well established and RBC and the wider region have an opportunity to catalyse growth by providing the type, quality and quantity of housing that is required to underpin a generational change in the regional economy.
- 3.3 Wolvey is strategically located in the north of the Borough and is in a location that can support the economic growth of key employment nodes in the region, including Coventry, Hinkley, Nuneaton and Rugby, as well as the West Midlands conurbation.

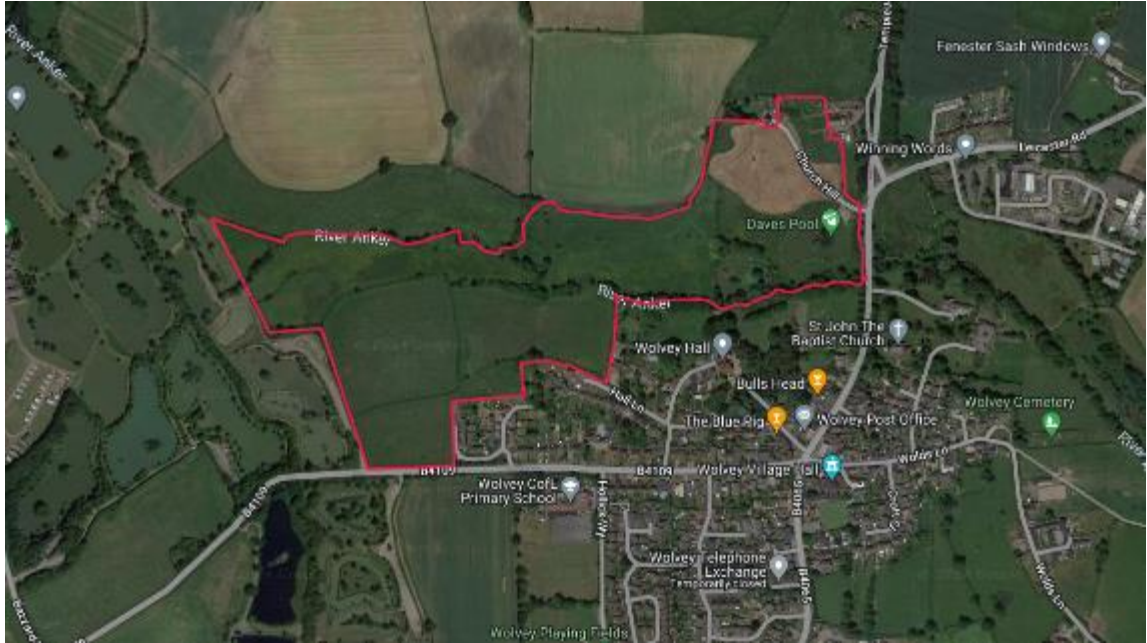
Site and Surroundings

The Wider Site

- 3.4 The wider site is circa 19 hectares of gently undulating grassland located to the north west of Wolvey. The wider site is bound by the B4109 to the east; the built settlement of Wolvey to the south (with the B4109 fronting the site in the south-west corner); Makins Fishery to the west; and open countryside (in flood zone 2/3) to the north.
- 3.5 The site is bisected by the River Anker which runs east-west across the site, and is lined by woodland that acts as the southern boundary on the eastern part of the site. In the north-east corner of the site, there is a single residential building with a private driveway leading from the B4109 north-westwards to the building. 120m to the south of this building, is a fishing pond identified as 'Daves Pool', with a second pond directly to the

west, adjacent to the River Anker. Besides a scattering of trees and hedgerows lining field boundaries within the site, there are no other significant identifiable features.

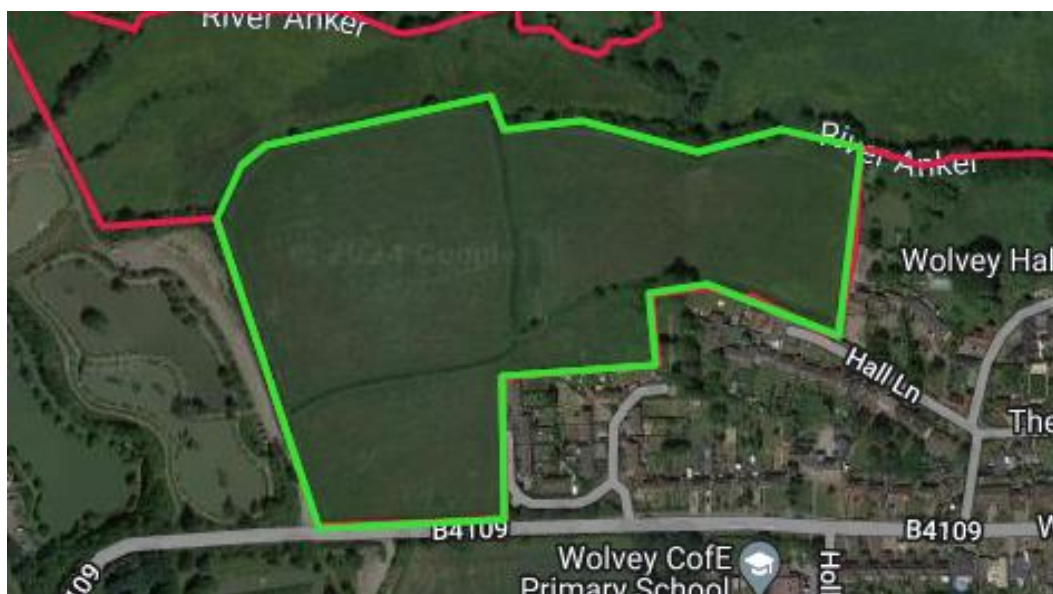
Figure 2: The Wider Site



The Promotion Land

3.6 The promotion land (shown on the following page) forms a natural extension to the urban edge of Wolvey and extends some 7.05 hectares. It is currently in arable use and has been heavily farmed, forming three distinct land parcels. It is bounded by the River Anker to the north (which is bounded by existing trees and vegetation), established residential uses to the east, the B4109 highway to the south and Makins Fishery to the west. These features provide a significant sense of enclosure to the site and minimise its openness and contribution to the wider Green Belt.

Figure 3: Promotion Land



Technical & Environmental Considerations

- 3.7 Whilst PfP will commission an expert technical team to analyse and assess the site, an initial desktop appraisal has been performed to gain an initial understanding of the potential constraints and opportunities for the wider site.

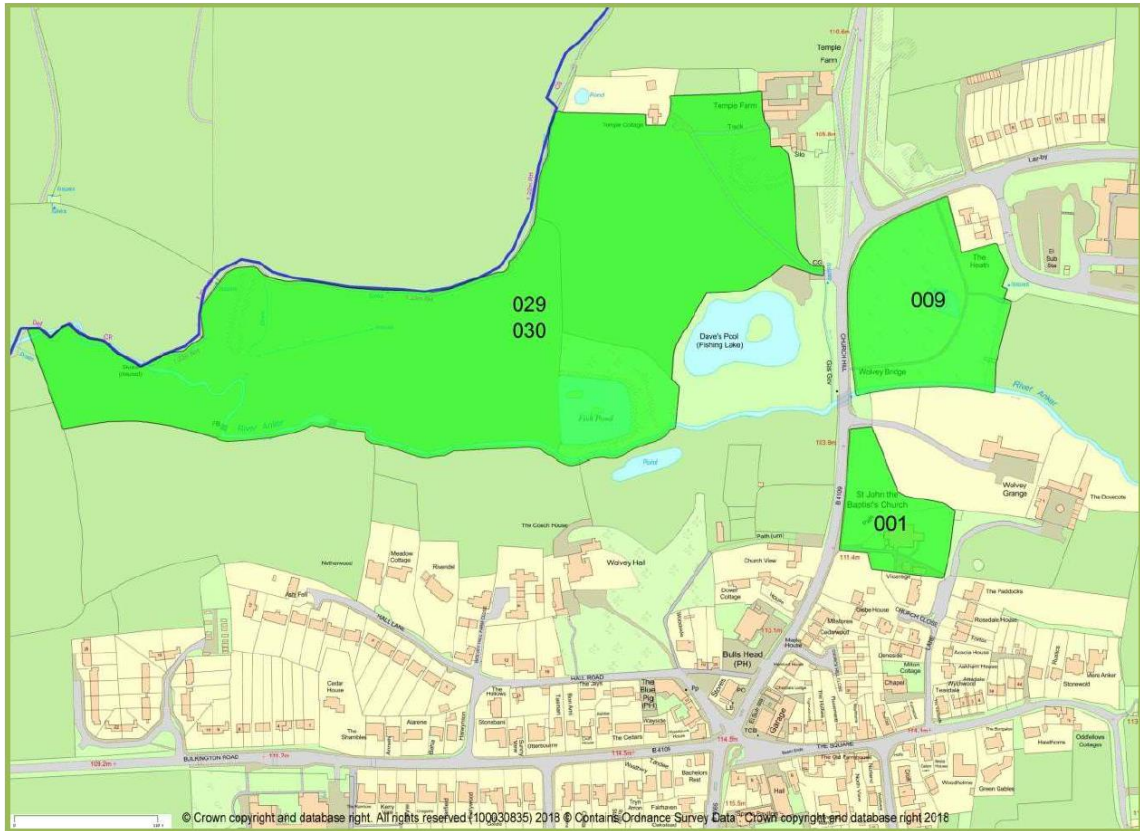
Highways and Access

- 3.8 The promotion land is currently accessible via the B4109 to the south of the site. Specialist highways and access will be commissioned to understand the feasibility of taking access from the B4109 and any impacts on highways capacity.

Ecology

- 3.9 There are no statutory ecological designations identified within the wider site or the promotion land. However, the made Wolvey Neighbourhood Plan identifies an area known as Anker Meadows within the wider site, which is a “Location of Local Greenspace” identified in Figure 4 below (ref: 029/030).

Figure 4: Location of Anker Meadows Local Greenspace, Wolvey Neighbourhood Plan



3.10 The Neighbourhood Plan describes Anker Meadows as follows:

“A contiguous area, previously two parcels, of flood-plain pasture. Access via footpath R287 directly from Temple Hill and the village; used for informal recreation and enjoyment. Effectively this is a relic of the medieval landscape of the parish and is valued for its beauty and tranquillity. Includes the river, its banks and a tributary stream, with associated riparian habitats and species, old hedgerows and trees, also important earthworks and other earthworks providing evidence of manorial and village habitation and river management. Part of the site includes Warwickshire Historic Environment Record (HER) site MWA3574: Medieval settlement site, possibly religious, fishponds and probable Manor House site, all visible as earthworks.”

3.11 PfP is not proposing to promote Anker Meadows for development, but an opportunity may exist to improve the accessibility and biodiversity of, and protection for, this part of the Green Belt within any scheme to develop the promotion land; which would provide significant benefits to the existing community through environmentally-conscious planning for the enjoyment and public use of this site.

- 3.12 The promotion land itself has limited on-site features with the potential for ecology outside of its boundary vegetation; however, an ecological appraisal will be commissioned to understand on-site habitats and to consider the potential to deliver significant biodiversity enhancements across the wider site.

Trees

- 3.13 An investigation and assessment of existing trees will be undertaken in relation to the promotion land; however, mature trees are largely confined to River Anker valley, hedgerows and site boundaries; and the intention will be to incorporate any mature trees into a masterplan for the site.

Heritage

- 3.14 There are no statutory heritage designations within the wider site or promotion land. The closest heritage designation is the Grade 2* Listed St John the Baptist Church which lies c.100m to the south-east of the site (although it is c.300m from the closest developable area of the site). Grade 2 Listed Wolvey Hall lies c.170m east and c.80m south of the site. A heritage expert will be consulted, where necessary, as part of the suite of technical works in order to establish whether the development of the site may impact the heritage assets and, if so, how best to protect the heritage assets.

Flood Risk and Drainage

- 3.15 The wider site is bisected by an area of Flood Zone 3, which follows the route of the River Anker (shown on Figure 5 below). The remainder of the site, including the promotion land, is located entirely within Flood Zone 1, which has the lowest risk of flooding, defined as land having less than 1 in 1000 years' annual probability of flooding. A Flood Risk Assessment will be commissioned to understand the impact of any future development on the River Anker Flood Zone, including any mitigation required.

Figure 5: Flood Map for Planning



Landscape and Visual Impact

- 3.16 The promotion land is visually and physically contained by prominent physical features and visual receptors, including River Anker valley to the north (which is bounded by existing trees and vegetation), established residential uses to the east, the B4109 highway to the south and Makins Fishery to the west. A landscape and visual assessment will be commissioned to consider the site within its landscape context and visual envelope.

Summary

- 3.17 In summary, the promotion land is unconstrained and suitable for development. It provides a deliverable opportunity for new residential development on the northern edge of Wolvey and could be supported by improvements to the biodiversity and accessibility of the wider site for the benefit of the local community.

Deliverability

- 3.18 The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic timeframe once a Local Plan is adopted.
- 3.19 PfP is fully committed to the site and consider that it could be brought forward immediately on allocation, or earlier if an acute need is established, to meet the housing and employment needs of the Borough. In summary the site is:

- **Available** – PfP has control over the entire site and had the track record in housing delivery to bring forward as soon as the Local Plan is adopted. PfP is an experienced land promoter and has an extensive track record in delivering a diverse range of high-quality new housing developments across the UK. In the past year, PfP have created 2,680 new homes across the country in sustainable, innovative, and attractive new neighbourhoods. These are places where people want to live, work and play, with the supporting social and physical infrastructure to thrive into the future.
- **Suitable** - the site is entirely suitable for a residential development for the following reasons:
 - It offers a sustainable location for development on the edge of Wolvey, with access to a range of services and facilities.
 - It is a natural and logical extension to the northern edge of Wolvey with durable boundaries, while being visually and physically contained by prominent physical features and visual receptors, including River Anker valley to the north (which is bounded by existing trees and vegetation), established residential uses to the east, the B4109 highway to the south and Makins Fishery to the west.
 - There are no initial environmental or technical constraints that are considered to prevent the development of the site, subject to suitable mitigation and a sensitive approach to design.
 - It can deliver immediate vehicular access to the strategic highway network via the B4109.
 - It offers the potential for significant accessibility and biodiversity improvements to the Green Belt, as part of the wider site under PfP's control.
- **Achievable** – an assessment of the site constraints illustrates that delivery of the entire site is achievable, and a professional team of technical experts will be retained to support the detailed design of the site moving forward. Where any potential constraints have been identified, PfP will consider the necessary mitigation measures and required investment in order to overcome any deliverability barriers. PfP has reviewed the economic viability of the scheme in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in Wolvey; as well as the cost factors associated with the site, including site

preparation costs and site constraints. PfP confirms that the development of the site is economically viable in accordance with the NPPF.

Key Benefits

3.20 The allocation of the site will support new housing in an appropriate location and ensure that a quantity, quality and mix is provided that supports economic growth in Wolvey and the north of Rugby Borough. The delivery of the site will provide significant benefits to the Borough, to Wolvey and the existing community. These are summarised as follows:

Economic Benefits

3.21 The development of the site will have significant economic benefits, both from its construction and occupation, and in the catalytic impact it would have within Wolvey. Key economic benefits include:

- Generating investment during the construction phase of development through construction cost, FTE construction jobs and an increase in GVA. The scheme will generate construction investment and sustain construction jobs for the length of the construction programme, offering a recognised pathway into employment for registered unemployed residents in Rugby.
- Providing long term occupation benefits including new resident expenditure, attracting new and high earning residents to RBC, generating flow on and supported jobs and, overall, generating increased economic output in the Borough.
- Generating significant revenue for the Local Authority, with a development of c.200 homes generating significant annual Council Tax revenue, and a New Homes Bonus.
- Being a catalyst to the growth of North Rugby and other employment nodes by providing the quality of housing that will underpin the retention of skilled workers and support high value jobs in knowledge-led industries.

Creating Social Benefits and Social Inclusion

3.22 The delivery of the site will have clear social benefits for existing and future residents, by providing greater choice for housing and amenities, improving access to amenities and meeting a variety of identified housing needs. The key social benefits include:

- Delivering high quality market homes to meet the needs of the Borough's existing and future employees.

- Providing viable and deliverable affordable homes to address the Borough's acute affordability crisis and support the housing of key workers and first time buyers. The site will provide, at a minimum, a policy compliant level of affordable housing.
- Delivering new and accessible multifunctional open space, amenity space and green infrastructure to benefit existing and future residents and to improve connectivity to amenities at Wolvey.
- Providing new residents to sustain demand for good quality public services and local social infrastructure in Wolvey. This increase in housing and inflow of investment will further encourage the retention of a working-age population in Wolvey which will encourage the realignment of the demographic disparity, providing long-term security for the settlement.

Environmental Benefits

3.23 The site is currently arable farmland with limited biodiversity or recreational value. The development of the site has the potential to significantly uplift the biodiversity, accessibility and overall enjoyment and environmental value of the site. In addition, the site has the potential to strengthen the quality and accessibility of the adjacent local greenspace of Anker Meadows and provide significant value to the local area in doing so. Key environmental benefits include:

- The site is extensively farmed and has limited ecology value at present, which provides an opportunity to create new habitats for a range of species and deliver an uplift in biodiversity to meet Government targets.
- The provision of multi-functional green infrastructure and open space that will benefit existing residents and create new, high-quality green corridors and open greenspace through the site.
- The protection and enhancement of existing features on the site that add value, including mature trees, hedgerows on the site boundary, and specifically, the Anker valley and Anker Meadows.
- Exploring the potential for improved accessibility to the Green Belt and biodiversity enhancements to the wider site, including Anker Meadows; to provide benefits for existing residents.

- Embedding energy efficiency and zero carbon ready by design into the fabric of the development, and employing cutting edge new net zero technologies.

APPENDIX 1 – Call for Sites Proforma