



5 Year Housing Land Supply Position Statement 2021-2026

1 Introduction

The following statement sets out Rugby Borough Council's 5 Year Housing Land Supply (5YHLS). The main statement explains the overall assessment and figures used in calculations, before summarising the results. *Appendix 1* sets out the detailed calculations, and *Appendix 2* the list of sites used.

2 Background

The Rugby Borough Local Plan was adopted in June 2019 following a successful examination by the Planning Inspectorate. The Plan covers the period 2011-2031.

The Plan identifies a need of 12,400 dwellings to be provided in the Borough throughout the plan period at a rate of 540 per annum between 2011/12 to 2017/18 and 663 per annum between 2018/19 to 2030/31. The Plan seeks to meet this need through allocations of new sites and identification of sites coming forward as detailed in the Housing Trajectory contained in Appendix 2 of the Plan.

In considering the Plan's 5YHLS, the Inspector determined that:

"Under the 2018 HDT (Housing Delivery Test) a 5% buffer will apply post adoption, on which basis 5,067 dwellings represents a supply of around 6.15 years"

Footnote 38 of paragraph 74 (b) of the NPPF states that a plan adopted between 1 May and 31 October will be considered 'recently adopted' until 31 October of the following year. For the Rugby Local Plan, this applied therefore until 31 October 2020.

3 Position 2021/22-2025/26

There has been a sizable over-delivery against the Local Plan Annual Requirement (LPAR) for the years 2018/19 through to 2020/21. This significantly reduced the housing shortfall which had accumulated from earlier on in the plan period between 2011/12 to 2016/17, and now stands as a marginal surplus. For the Housing Delivery Test (HDT) the Council has achieved 2017/18 108%, 2018/19 110% and 2019/20 132%. Due to the number of completions in 2020/21 a high percentage HDT score is also expected for this year when published by the Ministry of Housing Communities and Local Government (MHCLG). Based on this it has been determined that a 5% buffer should be applied to the 5YHLS calculation as detailed in paragraph 74 of the NPPF 2021. The annual

requirement and buffer to be applied are set out in Table 1 below, which are also presented as part of the calculations in *Appendix 1*.

Table 1: Housing Requirement

	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Completions	338	456	448	425	534	381	578	939	859	832				
Local Plan Annual Requirement (LPAAR)	540	540	540	540	540	540	540	663	663	663	663	663	663	663
Shortfall/Surplus against the Local Plan Annual Requirement	-202	-84	-92	-115	-6	-159	38	276	196	169				
Total Shortfall/Surplus of Post Adoption Plan Period	-202	-286	-378	-493	-499	-658	-620	-344	-148	21				
Annualised Requirement including Shortfall made up in the first five years										659	659	659	659	658
Total requirement														3294
Total Requirement for 5YHLS plus 5% buffer														3458.7
Annualised Requirement including shortfall and 5% buffer											692	692	692	692

The consecutive years of over-delivery since 2017/18 suggests a trend that shows the Borough is on course to achieve the housing numbers identified in the Local Plan, however in calculating the 5YHLS it is necessary to identify the deliverable sites likely to come forward as referred to in Paragraph 74 of the NPPF 2021.

Annex 2 of the NPPF 2021 defines a deliverable site as follows:

Deliverable: *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.*

In particular: a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it

should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

4 Site Selection 2020/21-2024/25

All sites with detailed permission (i.e. Full or Reserved Matters) have been considered deliverable. Parcels at the South West, Coton Park East and Main Rural Settlement allocations have also been considered deliverable, as although detailed applications are yet to come forward or be determined for many of these sites, evidence and information put forward by developers on timescales for development was assessed as part of the Local Plan examination. There has also been engagement with stakeholders as part of the South West Supplementary Planning Document preparation and through stakeholder consultation on the 5YHLS individual site assessments, where several responses were received from site owners and their agents. A limited number of 'minor' outline applications have also been included, in line with the NPPF 2021 definition of deliverable.

Following an analysis of historic records, it was considered appropriate to apply a standard lead-in time of 18 months from a detailed permission and a delivery rate of 40 dwellings per annum, unless sufficient information was available to demonstrate otherwise. A lead-in time of 24 months was initially applied to outline permissions.

A windfall allowance of 55 dwellings per annum has been applied to the calculations. This figure is based on data showing there has been an average of 52.9 dwellings p.a delivered as windfall sites during the plan period so far between 2011/12 - 2020/21, however within the last 5 years (2016/17-2020/21) this average has increased to 60.9 dwellings p.a. A windfall site has been considered as being less than 5 dwellings in size and also not built on Garden Land.

The list of all sites considered as part of the 5YHLS and trajectories used in the calculation are included in *Appendix 2*.

5 Calculation 2021/22-2025/26

A base analysis of deliverable sites shows that for the period 2021/22 to 2025/26 the Council can identify a supply of 6.58 years, with the numbers of houses being delivered increasing significantly from 2023/24 onwards.

In considering the final figure to be used in the 5YHLS calculation however, it has been considered appropriate to apply a non-implementation rate of 5%. Whilst historical records dating back to 2006 indicate an average of around 9% non-implementation, this pre-dates the current plan period when methods of engagement with developers were different and site analysis was less detailed. The method of assessment for the current 5YHLS requires greater analysis of the specific sites to ensure their deliverability and a greater level of engagement with developers. The majority of dwellings identified as deliverable are also from larger allocated sites where specific evidence has been examined and greater developer engagement at more regular intervals has taken place in relation to timescales, in comparison with earlier plan periods.

With the application of the 5% non-implementation rate (in addition to the 5% buffer), the Council considers that for the period 2021/22-2025/26 it can demonstrate a 5YHLS figure of **6.25 years**.

This is a snapshot at the time of writing and it needs to be understood that the calculation is fluid, for example due to new permissions being granted or a change to developer timescales.

The above scenarios are presented in *Appendix 1*.

6 Summary

The Council considers it can demonstrate a 5YHLS figure of **6.25 years** for the period 2021/22 to 2025/26 based on 2020/21 monitoring data supplemented by partial monitoring for 2021/22 undertaken so far, along with stakeholder engagement.

Greater numbers of dwellings are expected to be delivered from 2023/24 onwards, and this is considered likely to be maintained or increased as output from the larger allocations gains momentum and new permissions on these sites come forward. In the medium to longer term this is expected to further increase the 5YHLS figure to a level comfortably above the 5 year threshold.

APPENDIX 1: 5YHLS POSITION 2021-2026

Completions to Date

Year	Local Plan Target	Net Completions
2011-12	540	338
2012-13	540	456
2013-14	540	448
2014-15	540	425
2015-16	540	534
2016-17	540	381
2017-18	540	578
2018-19	663	939
2019-20	663	859
2020-21	663	832
Total	5769	5790

Calculations

A	Housing Target (2011-31)	12400
B	Annual requirement (2011-2017)	540
C	Annual requirement (2018-2031)	663
D	Total Requirement to date	5769
E	Completions to date	5790
F	Under supply (D-E)	-21
G	5 Year Local Plan Target (663*5)	3315
H	5 Year Local Plan Target including under supply (F+G)	3294
I	Add 5% buffer (H * 1.05)	3458.7
J	5 Year Annualised Requirement (with 5% buffer) (I/5)	692

Supply

Year 1 of 5 year Supply is 2021/22

	2021/22	2022/23	2023/24	2024/25	2025/26	Total
Annualised Requirement (J)	691.7	691.7	691.7	691.7	691.7	3458.7
Projected Supply	798	846	920	1102	884	4550

	Total Projected Supply	5 Year Supply	With 5% Non-Implementation Rate	10% NI Rate
5YHLS with 5% buffer for period 2021-2026	4550.0	6.58	6.25	5.92

Land west of Sawbridge Road, Grandborough.	Detailed - R21/0122 (R18/0405 Outline) - 9 Units	04/06/2021	Y		0	9												9	
Newbold Farm, Main Street, Newbold, CV21 1HW	Detailed - R14/2369 R20/0105 (13 total) 6 units rem	22/03/2021	Y		6													6	
2 Northampton Lane	Detailed - R19/1453 - 5 Units (1 built in 20-21)	29/01/2020	Y		4													4	
Outline Permissions																			
A One Social Club, 1A Market Street, Rugby. CV21 3HG	Outline- R15/0605- 12 Units	31/07/2018	N															0	
Land at, and to the rear of, 80-84 Railway Terrace, Rugby, CV21 3EZ	Outline- R18/1765- 9 Units	17/04/2019	Y		0	9												9	
Land at Manor Farm, Hinckley Road, Burton Hastings. CV11 6RG	Outline- R17/2041- 6 Units	11/11/2019	Y		0	6												6	
Land Rear of 30 Albert Street, Rugby. CV21 2RS	Outline- R19/0981- 8 Units	06/12/2019	Y		0	8												8	
Submitted Applications for 100 or more dwellings																			
Land on the East Side of Kilsby Lane, Hillmorton	Current Application- Outline- R15/1366- 130 Units	Submitted 21/08/2017	N															0	
Coventry Stadium, Rugby Road, Coventry. CV8 3GJ	Current Application- Outline- R18/0186- 137 Units	Submitted 16/01/2018	N															0	
Lawford Fields Farm, Long Lawford	R20/0134 - Outline - 350 Units	Submitted 19/05/2020	N															0	
Submitted Applications for 50 - 99 dwellings																			
Dipbar Fields, Dunchurch (Morris Homes)	Current Application- Detailed - R19/1047 for Outline- R13/0690- 86 Units	Submitted 12/07/2019	N															0	
Submitted Applications for 10 - 49 dwellings																			
Submitted Applications for 5-9 dwellings																			
Windfalls																			
					55	55	55	55	55	55	55	55	55	55	55	55	55	55	550
TOTAL TRAJECTORY					0	798	846	920	1102	884	740	687	580	545	428				7530

Key
 Not Deliverable