



5 YEAR HOUSING LAND SUPPLY POSITION STATEMENT 2022-2027

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.

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.

2. POSITION AS AT 1ST APRIL 2022

There has been a sizable over-delivery against the Local Plan Annual Requirement (LPAR) for the years 2018/19 through to 2021/22. 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 surplus of 297.

For the Housing Delivery Test (HDT) the Council has achieved 2017/18 108%, 2018/19 110%, 2019/20 132% and 2020/21 155%. Due to the number of completions in 2021/22 a high percentage HDT score is also expected for this year when published by the Department for Levelling Up, Housing and Communities.

Based on the above, 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	2025-26	2026-27
Completions	338	456	448	425	534	381	578	939	859	832	939					
Local Plan Annual Requirement	540	540	540	540	540	540	540	663	663	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	276					
Total Shortfall/Surplus of Post Adoption Plan Period	-202	-286	-378	-493	-499	-658	-620	-344	-148	21	297					
Annualised requirement including shortfall/over-supply applied to the first five years												604	604	604	604	604
Total requirement																3020
Total requirement + 5% buffer																3171
Annual requirement including shortfall/over-supply and 5% buffer												634	634	634	634	634
Total supply																3587
Number of years' supply																5.7
Supply with 5% non-implementation rate applied																5.6

The consecutive years of over-delivery since 2017/18 suggest 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.

3. SITE SELECTION 2022/23 – 2026/27

All sites with detailed permission (i.e. Full or Reserved Matters) have been considered deliverable. At Rugby Radio Station (Houlton) the site is underway and progressing swiftly with numerous housebuilders on site. There have been rolling submissions of reserved matters for individual parcels within the defined key phases. A delivery rate of 225-250 per annum on the site has been supported by the master developer.

Several of the main rural settlement allocations now have planning permission or applications awaiting determination.

On the South West Rugby sites a conservative approach has been taken with completions within five years only projected on those parcels where planning permission or resolution to grant subject to s106 is in place.

This statement has been supported by site assessment and consultation with site owners and their agents.

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 50 dwellings per annum has been applied to the calculations. This figure is based on data showing there has been an average of 50.7 dwellings p.a delivered as windfall sites during the plan period so far between 2011/12 - 2021/22. A windfall site has been defined as being a site for 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*.

4. CALCULATION 2022/23 – 2026/27

A base analysis of deliverable sites shows that for the period 2022/23 to 2026/27 the Council can identify a supply of 5.7 years.

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% for sites that are not-allocated nor under

construction. 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 for sites that are not allocated nor under construction (in addition to the 5% buffer), the Council considers that for the period 2022/23-2026/27 it can demonstrate a 5YHLS figure of **5.6** 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 calculations are presented in Appendix 1.

5. SUMMARY

The Council considers it can demonstrate a 5YHLS figure of **5.6** years for the period 2022/23 to 2026/27 based on 2021/22 monitoring data along with stakeholder engagement.

A consistent supply of dwellings significantly above the annual requirement is expected. In the medium to longer term this is expected to increase the 5YHLS figure to a level comfortably above the 5 year threshold.

APPENDIX 1: 5YHLS POSITION 2022-2027

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
2021-22	663	939
Total	6432	6729

Calculations

A	Housing Target (2011-31)	12400
B	Annual requirement (2011-2017)	540
C	Annual requirement (2018-2031)	663
D	Total Requirement to date	6432
E	Completions to date	6729
F	Under supply (D-E)	-297
G	5 Year Local Plan Target (663*5)	3315
H	5 Year Local Plan Target including under supply (F+G)	3018
I	Add 5% buffer (H * 1.05)	3168.9
J	5 Year Annualised Requirement (with 5% buffer) (I/5)	634

Supply

Year 1 of 5 year Supply is 2022/23

	2022/23	2023/24	2024/25	2025/26	2026/27	Total
Annualised Requirement (J)	634	634	634	634	634	3169
Projected Supply	821	827	660	663	615	3586

	Total Projected Supply	5 Year Supply	With 5% Non-Implementation Rate
5YHLS with 5% buffer for period 2022-2027	3586	5.7	<u>5.6</u>

Remainder of Radio Station Allocation	Outline R11/0699 - (6,200 Units allocation total) 4114 remaining without detailed permission.	21/05/2014	Y						0	63	65	80	153	185	186	225	225	2930	4112
Current Permissions & Prior Approvals - 100 dwellings or more																			
Cawston Extension, The Spinneys- Southern Part of Cawston Extension (Lin	Detailed- R16/1780, R17/1895, R19/1387- 246 Units	23/03/2018	Y	39	88	39	69	11											11
Former Cattle Market, Craven Road, Rugby	Detailed- R19/0804- 360 Units	20/09/2020	Y				125	118	117										235
Former Newton Vehicle Rentals Site, 117 Newbold Road	Detailed- R19/1496 - 122 Units. Previous Detailed- R17/2113 & R19/0902	20/08/2020	Y				0	40	40	40	2								122
Current Permissions & Prior Approvals- 50-99 dwellings																			
Herbert Gray College	Detailed - R18/1811 (78 units C2)																		0
Current Permissions & Prior Approvals- 10-49 dwellings																			
Shaw School of Dancing, Jubilee Street. CV21 2JJ (Southern Site)	Detailed- R19/1397- 12 Units	24/12/2019	Y				0	12											12
Yum Yum World Ltd, 4 High Street, Rugby, CV21 3BG	Detailed- R17/0967- 21 Units	03/04/2019	Y				5	16											16
Webb Ellis Industrial Estate, Woodside Park, Rugby, CV21 2NP	Detailed- R19/1419- 12 Units	06/11/2020	Y				0	12											12
Gemini, Southam Road, Tof. CV22 6NW	Detailed- R18/0833 - R19/1211 (20.04.21)- 10 Units	20/04/2021	Y				0	0	10										10
Land P19216, Brownsover Road, Brownsover	Detailed- R18/1247- 16 Units	10/02/2021	Y				0	16											16
Land South East of Brownsover Lane, Brownsover Lane, Brownsover	Detailed - R14/1941, R22/0449- 14 Units	08/04/2020	Y				0	14											14
NEW																			
Development Land at Pailton Radio Station, Montilo Lane, Pailton, CV23 0HD	Detailed - R21/0937 - 10 Units	08/11/2021	Y				0	10											10
Current Permissions & Prior Approvals- 5-9 dwellings																			
21 Mill Road, Rugby	Detailed- R17/1567- 9 Units	03/08/2018	Y				0	9											9
76 Buchanan Road, Bilton	Detailed- R18/0830- 8 Units	22/11/2018	Y				0	5											5
The Old Hall, 24 Lilbourne Road, Clifton upon Dunsmore	Detailed- R18/2022, R19/1433, R19/0379 - 7 Units	09/01/2019	Y				0	3											3
Former Goji Restaurant, 424 London Road, Stretton on Dunsmore, CV23 9H	Detailed- R16/1939, R20/0363- 7 Units	16/11/2021	Y				0	0	7										7
123 Clifton Road, Rugby. CV21 3QJ	Detailed- R19/0924- 6 Units	18/09/2019	N				0	0											0
2A Lower Hillmorton Road, Rugby. CV21 3SU	Detailed- R19/1315- 8 Units	17/12/2019	Y				0	8											8
Manor Farm, Birdingbury Lane, Frankton. CV23 9PB	Detailed- R19/1451 and R19/0754- 5 Units (4 remain	27/06/2019	Y				0	4											4
Land to rear of 321 Hillmorton Road, Rugby.	Detailed - R19/1013- 9 Units	30/06/2020	Y				0	9											9
Advertising right between 254-256 Lawford Road, New Bilton, Rugby, CV21	Detailed - R19/0485 - 6 Units	03/04/2020	Y				0	6											6
First Floor 8a Church Street, Rugby, CV21 3PH	Detailed - R20/0254 - 6 Units	29/05/2020	Y				0	6											6
7 & 8, St Matthews Street, Rugby, CV21 3BY	Detailed - R20/1092 - 7 Units	19/02/2021	Y				0	7											7
5, 5b and 6 Market Place, Rugby, CV21 3DY	Detailed - R20/0043 - 7 Units	10/02/2021	Y				0	7											7
Land west of Sawbridge Road, Grandborough.	Detailed - R21/0122 (R18/0405 Outline) - 9 Units	04/06/2021	Y				0	0	9										9
Newbold Farm, Main Street, Newbold, CV21 1HW	Detailed - R14/2369 R20/0105 (13 total) 6 units rem	22/03/2021	Y				0	6											6
NEW																			
Rosewood House, 42-44 Rosewood Avenue, Rugby, CV22 5PL	Detailed - R19/1498 - 5 units	06/07/2020	Y				0	5											5
Grange Farm, London Road, Ryton on Dunsmore CV8 3EW	Detailed - R19/0947, R21/0562 - 7 Units	09/09/2021	Y				0	7											7
Diamond House Hotel, 28 Hillmorton Road, Rugby, CV22 5AA	Detailed - R20/0960 - 8 Units	09/07/2021	Y				0	8											8
49 Midas Lounge, Church Street, Rugby, CV21 3PT	Detailed - R21/0115 - 5 Units	30/04/2021	Y				0	5											5
241 Sedlescombe Park, Dunchurch Road, Rugby, CV22 6HP	Detailed - R21/0164 - 9 Units	25/06/2021	Y				0	9											9
Manor Farm House, Main Street, Frankton, Rugby, CV23 9PB	Detailed - R21/0905 - 5 Units	12/01/2022	Y				0	5											5
15 Bilton Lane, Rugby	Detailed - R19/1309 (R21/0353, R21/0451, R22/012	17/05/2021	Y				0	5											5
A One Social Club, 1A Market Street, Rugby. CV21 3HG	Detailed R21/0307 6 units, (Outline- R15/0605)	01/10/2021	Y				0	6											6
Land at Manor Farm, Hinckley Road, Burton Hastings. CV11 6RG	Detailed R22/0260 - 6 units	22/12/2022	Y				0	6											6
Outline Permissions																			
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 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																			
Lawford Fields Farm, Long Lawford	Current application - Outline R20/0134 - 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																			
TOTAL TRAJECTORY																			
								236	519	821	827	660	663	615	722	817	713	786	6624

Key

Not Deliverable