

Rugby Borough Council Housing Needs SPD 2021

**Adoption Statement Appendix A-
Modifications made as a result of
representations received**



1. Introduction

1.1 This document sets out a summary of the responses and modifications made to the Housing Needs Supplementary Planning Document (SPD) 2021 consultation.

1.2 The consultation period ran from 10th November to 22nd December 2020. Copies of the Housing Needs SPD 2021 are available at:

https://www.rugby.gov.uk/directory/25/our_planning_strategies_policies_and_evidence/category/92

1.3 15 responses were received. 12 were received by email and 3 were received via the dedicated online consultation response form.

1.4 A copy of the responses and a list of consultees who made representations to the consultation can be found at the end of this document.

2. How did we consult?

2.1 The consultation was carried out under Regulations 11 to 16 of the (Local Planning) (England) 2012 (TCPA Regulations) and the Council's adopted Statement of Community Involvement SCI (updated September 2020 due to the COVID-19 pandemic).

2.2 The details of the consultation including where to view the document online and how to respond to the consultation were published on the Rugby Borough Council website and in the Rugby Observer newspaper.

2.3 All statutory consultees and any individuals and businesses whose details were held on the Development Strategy Consultation Database received either a letter or an email notifying them of the consultation and where to view the documents online. Copies of the consultation documents were made available on the Council's website.

2.4 Due to the COV-19 pandemic, hard copies were not placed in libraries although it was made clear that hard copies of the SPD could be posted to consultees. 3 requests were received to post out hard copies of the document.

2.5 Following the introduction of GDPR regulations, the Development Strategy Database had been updated to include only those the Council had a duty to consult, and those who had 'opted in' or expressed a wish to be notified of future Local Plan documents.

2.6 Representations could be made by email, online representation form or by post.

3. What did consultees say?

4 main issues were raised:

Scope of the SPD

3.1 In relation to the scope of the document, a comment was made that the SPD does beyond what an SPD can include. This SPD is broader than the previous Housing Needs SPD to reflect changes to the planning system. Much of the content of the 2012 Housing Needs SPD is included within the Local Plan itself. All sections of the SPD have a clear policy basis to justify the detail included. Therefore whilst the document is broader than before, a single document is considered preferable for ease of use to multiple documents.

Negotiating levels of affordable housing

3.2 Comments were made in relation to negotiating levels of affordable housing. The inclusion of viability reviews was questioned. The text has been amended. Further details on viability reviews are to be provided within the Planning Obligations SPD.

'Clustering' of affordable housing

3.3 Developers raised concern around the inclusion of 'clustering', specifically the example given of clusters of 10 homes. The document is however clear that this is provided as an example. The section on the clustering of affordable homes is part of a wider recognition for the need for tenure-blind development and to drive up the standard of affordable housing in the Borough. Providing a figure of 5-10 homes makes the document more accessible to the wider community who may not be familiar with the Planning process.

Self-build and custom housebuilding

3.4 The SPD is an opportunity to help define the Council's approach to self-build and custom housebuilding so further detail on this has been provided. In response to comments on community involvement a section has been provided to assist individuals and community groups looking to develop self-build and custom housebuilding plots. The wording is considered flexible enough to accommodate any future reforms of the self-build and custom housebuilding system included in upcoming Planning reforms.

Other comments

3.5 Other comments were made in relation to including updated references to key Planning documents and government initiatives, including detail on alternative tenures, clarifying text on affordable housing, including text on electric vehicle charging points and adding additional text on how off-site affordable housing could be calculated.

4. What action did RBC take as a result of the comments received?

Scope of the SPD

4.1 The scope of the document is considered appropriate to fulfil the requirements of Policies H1-H6, so no changes were considered necessary.

Negotiating levels of affordable housing

4.2 Additional text was inserted to confirm that matters such as viability review will be confirmed from the outset in any future Section 106 agreement.

'Clustering' of affordable housing

4.3 The text was amended to confirm that the number of dwellings listed in the document is an example.

Self-build and custom housebuilding

4.4 Amendments to overall self-build and custom housebuilding strategy to clarify the ways self-build can be delivered. The inclusion of 'signposting' for community groups to outline the different approaches to self-build and custom housebuilding. Additional detail on the delivery of self-build and custom housebuilding plots on strategic allocations.

5. List of consultees who made representations

- Warwickshire County Council Planning Policy
- Warwickshire County Council Flood Risk Management
- Historic England
- Natural England
- Place Partnership (OBO Warwickshire Police)
- Inland Waterways Association (Warwickshire Branch)
- Nuneaton and Bedworth Borough Council
- Cllr A'Barrow
- Cllr Sandison
- Dunchurch Parish Council
- Wolston Parish Council
- Framptons (OBO Tritax Symmetry LTD)
- Marrons (OBO L and Q Estates)
- Barton Wilmore (OBO Taylor Wimpey)
- 1 resident

Respondent	Comments	RBC Response	Action	Recommended Changes in bold or strike through (unless otherwise stated)
1.Cllr Sandison	<p>The Liberal Democrat Group are looking to respond to this consultation. Two issues stand out at this time the flexibility in the type of tenure that can be offered we seem to have got a bit institutionalised in tenure types and fails to reflect new models now being offered elsewhere like rent plus by other local authorities, which offers fixed term assured shorthold tenancies with the option to purchase after a agreed period with help towards a deposit for example.</p> <p>The numbers of units outlined in self build appears to discriminate on small sites against BAME/ community led or family groups. Not all are owned by the council and I can identify at least 3 sites in my ward that could be applicable to small self build schemes that are community led. Any advice would welcome on how we can enhance the wording in the SPD to reflect this would be welcome.</p>	<p>Comments noted. The SPD is designed to be sufficiently flexible to accommodate new tenure types although the Housing Strategy Team will primarily advise on this. Self-build projects are typically led by community groups under the current Self-build system. In principle the Council would support community groups coming forward to advance Self-build projects and would offer appropriate support. The Council has reviewed the land it owns for suitability for Self-build and will continue to do so. The Council is mindful that the government has recently consulted on reforms to the Planning system which may include additional changes to Self-build. There is uncertainty on what this will mean so the Council will ensure the SPD is flexible enough to</p>	<p>Chapter re-arranged so the Council’s approach is more clearly defined. Additional wording on community groups and Self build to be included. The purpose of additional wording is to provide guidance to ‘signpost’ community groups.</p>	<p>Consultation version Paras 7.2 – 7.21 have been rearranged and replaced in their entirety.</p> <p>Proposed changes (including a new layout for existing text and proposed new text) are identified below in bold:</p> <p>National Policy</p> <p>7.2 The primary legislation concerning self-build and custom housebuilding is the Self-Build and Custom housebuilding Act 2015, available to view below:</p> <p>http://www.legislation.gov.uk/ukpga/2015/17/contents/enacted</p> <p>Defining self-build and custom housebuilding</p> <p>7.3 Section 1 of the Self-build and Custom Housebuilding Act 2015 defines Self-Build and Custom Housebuilding as “the building or completion by individuals, association of individuals, or persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals. It does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person.”</p>

		<p>accommodate any changes.</p>	<p>7.4 Self-build involves direct involvement in organising and constructing a home. Custom build involves the commissioning of a specialist developer to deliver a home.</p> <p>Types of Self Build and Custom Housebuilding</p> <p>7.5 Individual self or custom build: An individual who buys a plot of land to develop and leads on building a home, although may employ the assistance of builders, architects etc.</p> <p>7.6 Group self or custom build: A group of individuals design and develop a scheme they live in. Again, they may employ the assistance of builders, architects etc.</p> <p>7.7 Developer-led custom build: A developer who provides plots to individuals within a larger scheme. The individual has significant input into the design and finish of the home in terms of internal layout and dimensions, window design and external materials.</p> <p>7.8 Community-led custom build: Community led development, usually in collaboration with a developer.</p> <p>Self-Build and Custom Housebuilding Register</p> <p>7.9 The Self and Custom Housebuilding Act 2015 requires the Council to keep and maintain a</p>
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			<p>register of individuals, and associations of individuals, who are seeking to acquire self- build serviced plots of land in the Borough for their own self build and custom housebuilding.</p> <p>7.10 The register provides information on the number of individuals and associations on the register; the number of serviced plots of land sought; the preferences people on the register have indicated, such as general location within the Borough, plot sizes and type of housing intended to be built.</p> <p>7.11 Details of the data held on the self-build and custom housebuilding register can be found within the Self-Build and Custom Housebuilding Report below:</p> <p>https://www.rugby.gov.uk/downloads/download/390/self-build-and-custom-housebuilding-report-2019</p> <p>7.12 Self-build and custom housebuilding projects are led by individuals and community associations. The Council's role is to provide enough suitable permissions. A 'suitable permission' is where planning approvals are granted for dwellings that could become self-build plots, should interested parties engage with landowners. For example, this may apply to approvals ranging from individual dwellings to up to 10 dwellings.</p>
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				<p>Serviced plot</p> <p>7.13 The definition of a serviced plot of land as set out in the Housing and Planning Act 2016 (9) (4), means a plot of land that:</p> <p>(a) has access to a public highway and has connections for electricity, water and waste water, or</p> <p>(b) can be provided with those things in specified circumstances or within a specified period.</p> <p>Developers are advised to work with the Borough Council and County Council on this.</p> <p>Delivering self-build and custom housebuilding Rugby Borough Local Plan</p> <p>7.14 The Council’s approach to delivering self-build and custom housebuilding is identified in the Local Plan. Self-build and custom housebuilding proposals should be compliant with all the policies in the Local Plan.</p> <p>Policy H1:</p> <p>7.15 “Sustainable Urban Extensions will be expected to provide opportunities for self-build and custom build as part of the mix and type of development.”</p>
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			<p>7.16 A threshold approach to delivering self-build and custom housebuilding was rejected by the Planning Inspector examining the Rugby Borough Local Plan due to insufficient evidence of demand.</p> <p>The Councils approach to delivering self-build and custom housebuilding is as follows:</p> <ul style="list-style-type: none">• Granting suitable permissions• Supporting Self-build and custom build housebuilding on strategic allocations• Assessing potentially suitable Council owned land• Supporting community groups to deliver Self-build and custom housebuilding• Supporting the inclusion of Self-build and custom housebuilding policies in Neighbourhood Plans• Where development sites have not been progressed, the Council will liaise with landowners and community groups to consider Self-build and custom housebuilding for such sites where appropriate• The Councils SHLAA provides a list of sites which have previously been submitted for those interested in Self-build and custom housebuilding to review <p>7.17 Demand is measured through the Self-build and custom housebuilding register. Since 2016, demand for self-build and custom housebuilding</p>
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			<p>has been met through the granting of suitable permissions or windfall sites. Should demand in the urban area rise above levels of supply, developers would enter into discussions with the Council on how to meet this demand. This would involve identifying potential suitable plots, defining phasing plans and separate access works to the non-self-build housing elements of Sustainable Urban Extensions (SUEs). Self-build and custom housebuilding plots within SUEs should be concentrated together to safeguard the coherence of a development. The housing mix should conform with the SHMA.</p> <p>7.18 Planning conditions would stipulate that a marketing strategy would be required. Self-build and custom housebuilding plots will be expected to be marketed for a minimum period of 12 months. Once plots have been marketed for the minimum period, they may then remain on the market as self-build and custom housebuilding plots, be offered for purchase to RPs, or be built out by the landowner as appropriate.</p> <p>7.19 A developer and the Council may work together to develop a design code for larger schemes. This would provide certainty by establishing what form any development could take. This can be supplemented by 'plot passports', which concisely identify site parameters for prospective plot purchasers.</p>
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				<p>7.20 The Council's Development Strategy Team has engaged with the Council's Corporate Property Team as to the availability of suitable Council owned land. No suitable sites have been identified so far. Engagement will continue as land availability is not static, so an annual review will take place to identify any suitable sites that may become available.</p> <p>Individuals and community associations</p> <p>7.21 The Council will work with and support individuals and community groups to bring forward Self-build and custom housebuilding plots. There are a number of online guides to assist with individuals who want to come together to form a community group.</p> <p>7.22 A starting point for community groups is to decide their preferred method for advancing Self-build and custom housebuilding. The below list provides some examples of delivery options to 'signpost' community groups. Engagement with the Councils pre-application advice service is recommended from the outset:</p> <ul style="list-style-type: none">• Neighbourhood Plans can facilitate Self-build and custom housebuilding through creating new policies and allocating suitable community development sites
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				<ul style="list-style-type: none">• Community groups could consider forming a Co-housing group or Community Land Trust• Community group could contact developers who specialise in Self-build and custom housebuilding• Community groups could look to form a partnership with a Housing Association• Neighbourhood Development Orders can be used to allocate sites for Self-Build and Custom Housebuilding: https://www.gov.uk/guidance/neighbourhood-planning--2#What-is-Neighbourhood-Development-Order• Community Right to Build Order: https://www.planningportal.co.uk/info/200130/common_projects/42/neighbourhood_planning/2 <p>Finance:</p> <p>7.24 Securing finance is a key factor for delivering Self-build and custom housebuilding. Specialist advice on securing finance and the most appropriate route for your project is recommended.</p> <p>There are three main routes to securing finance:</p>
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			<p>Self-build mortgages</p> <p>7.25 A range of self-build mortgages are available. A self-build mortgage differs from a standard mortgage as the funds are normally released in phases as the project progresses.</p> <p>Selling a property to raise funds</p> <p>7.26 Another option is to sell existing your home to raise funds and rent a property until the project is finished. The additional costs and risks of project delays with this method require very careful consideration.</p> <p>Government funding:</p> <p>7.27 Government support for Self-build and custom housebuilding is available from time to time. These schemes are subject to change so please check the governments website for the latest information:</p> <p>https://www.gov.uk/guidance/self-build-and-custom-housebuilding</p> <p>Self-build and Custom Housebuilding on Rural Exception Sites</p> <p>5.22 Where the need for cross-subsidy can be demonstrated, the potential to bring forward Self-build and custom housebuilding plots should be considered. There will still be a need to</p>
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				<p>establish that a household has a local connection to the Parish where the plot is proposed.</p> <p>5.23 Discounted Self-build and custom housebuilding plots for shared ownership properties may be able to come forward on Rural Exception Sites. Once completed, restrictions would ensure the homes remain affordable in perpetuity. Local connection and affordability criteria would apply.</p>
Warwickshire County Council Flood Risk Management	4.11 (Clustering) If a site is over 1ha it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site specific Flood Risk Assessment must be submitted to the Lead Local Flood Authority for review The LPA are the statutory	Comments noted.	None recommended	N/A

	<p>consultees on minor developments under 10 houses, any proposed developments of this nature should be in consultation with the LPA</p>			
<p>2.Warwickshire County Council Flood Risk Management</p>	<p>4.16 (Landscaping) Above ground SuDS could be utilised in open green spaces such as swales and attenuation basins/ponds</p>	<p>Comments noted. Such matters are dealt with through the Development Management process in consultation with Warwickshire County Council.</p>	<p>None recommended</p>	<p>N/A</p>
<p>2.Warwickshire County Council Flood Risk Management</p>	<p>4.26 (Climate Change) The WCC local guidance for developers should be added to the list of documents and policies to follow (https://api.warwickshire.gov.uk/documents/WCCC-1039-95), including following the SuDS best practice, and to the the CIRIA SuDS Manual and LASOO Guide for further details of best design for drainage features. All developments should include sustainable urban drainage systems, and site allocation plans should look to address flood risk and surface water drainage within them SuDS features should be at the surface and adequate treatment of flows should be provided to ensure that final flows leaving the site do not degrade the quality of accepting water bodies. Flood attenuation</p>	<p>Comments noted. The matters raised are relevant to all developments although in this instance this level of detail is likely more appropriate within the forthcoming revised Sustainable Design and Construction SPD. Text in the Housing Needs SPD 2020 refers to the SPD being read in conjunction with other relevant SPDs, so no further action is considered necessary on this point.</p>	<p>None recommended</p>	<p>N/A</p>

	<p>areas must be located outside of flood zones and surface water outlines to ensure that the full capacity is retained. You could include a point that the Lead Local Flood Authority requires SuDS to be designed in accordance with CIRIA 753 SUDS Manual.</p> <p>You could develop this point to include the SuDS hierarchy. The hierarchy is a list of preferred drainage options that the LLFA refer to when reviewing planning applications.</p> <p>The preferred options are (in order of preference): infiltration (water into the ground), discharging into an existing water body and discharging into a surface water sewer.</p> <p>Connecting to a combined sewer system is not suitable and not favourable. The adoption and maintenance of all drainage features is a key consideration to ensure the long term operation and efficiency of SuDS. As part of the planning procedure the LLFA will expect to see a maintenance schedule, at detailed design stages. All SuDS features should be monitored and cleaned regularly as a matter of importance. Please provide</p>			
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	<p>clarification of RBCs position on adopting SuDs. Easements of 8 m alongside watercourses and water bodies are important in providing access for maintenance, protecting and promoting biodiversity and in improving water quality and run-off. Appropriate easements should be built into any development proposal and should be agreed with the LLFA at an early stage in the planning process.</p> <p>We encourage the use of flood resilient design where possible. This includes considering the use of, for example, permeable paving and green roofs in developments.</p> <p>We encourage including blue-green infrastructure in the development design, such as using ponds and wetlands, and the use of landscaping and tree pits that can adapt to climate change.</p>			
3. Cllr A'Barrow	<p>I was appalled when a recent planning application which included affordable housing was passed and the footpath width in front of the affordable houses was so narrow that WCC said that this particular road would not be adoptable, thus giving future residents an extra cost. To provide affordable housing and</p>	<p>The Housing Needs SPD 2020 seeks to support tenure-blind development. The role of the SPD is to elaborate on existing policy which may assist the Development Management process. The SPD is unable to include specific sizes for</p>	<p>Please see above text on recommended amendments on Self-build and custom housebuilding</p>	<p>Please see above text on recommended amendments on Self-build and custom housebuilding</p>

	<p>then subject residents to an extra cost on top of the communal green space charge is so unfair. I know that the units are welcome and developers cost out the whole development to be able to deliver affordable but really if the affordable is to be indistinguishable from the rest then why this difference.</p> <p>The specialist housing section details needs for the elderly and less mobile. However it states that internal layout is not a planning decision and does not give actual measurements for any new build. Accessible and adaptable standard M4(2) minimum could be specified not just for specialist housing but for all new build. Looking forward houses would then be suitable for all needs.</p> <p>Similarly I didn't see anything about electric charge points or reference to keeping up with technology for carbon neutral initiatives for transport or heating. Eg To provide a heat source pump centrally for several dwellings.</p> <p>If we cant give guidelines in this document please advise me where</p>	<p>new builds as such matters would need to be subject to viability assessment, when a viability assessment has already been carried out for the Local Plan. The Housing Needs SPD 2020 will be read alongside other SPDs such as the Air Quality SPD and revised Sustainable Design and Construction SPD, which will address matters such as electric vehicle charging points. Ultimately the implementation of such matters will be through the Development Management process. The self-build process is typically led by community groups. The Council has reviewed Council-owned land and at this time does not have any suitable plots for self-build but will keep this under review. In principle the Council would be open to working with community groups on self-build schemes. The Council is aware that the</p>		
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	<p>we can. If we have an opportunity to improve housing need design in our borough we should be taking it.</p> <p>Self building and custom housebuilding plots including affordable housing – other local authorities have worked with outside stakeholders to provide development areas for selfbuild, I only saw reference to possibilities of up to 11 dwellings. Whilst we may not want a Graven Hill size development I have long said that we could be innovative and supportive of selfbuild and modular build, I see nothing exciting in this SPD. If you look at Tilia Park for instance I am sure the developer will say that the development sells and they know what people want but these red brick boxes are so depressing.</p>	<p>government's recent consultation on planning reforms referenced self build so there may be further changes to the system. Schemes of upto 11 homes are an indicative figure, so the Council would welcome larger schemes in principle, subject to all other considerations.</p>		
<p>Natural England</p>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p>	<p>Comments noted. Having considered the latest legislation and guidance an SEA is not required for this SPD. A scoping report has been produced.</p>	<p>None recommended</p>	<p>N/A</p>

	<p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment</p>			
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	<p>or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>			
<p>Wolston Parish Council</p>	<p>I can confirm that the consultation information has been reviewed and discussed by Wolston Parish Council. The Parish Council support the document in principle, and Councillors agreed they would respond individually to the consultation with their views and comments.</p>	<p>Comments noted.</p>	<p>None recommended</p>	<p>N/A</p>
<p>Framptons</p>	<p>This representation has been prepared by Framptons on behalf of Tritax Symmetry Ltd., in response to Rugby Borough Council's Draft Supplementary Planning Document Consultation dated November 2020 (referred to throughout as the SPD). Tritax Symmetry have land interests at the South West Rugby allocation site, which is allocated for 5,000 dwellings and 35 hectares of B8 employment land in the adopted Local Plan (June 2019) (policies DS3, DS4, DS5, DS8 and DS9).</p> <p>Tritax Symmetry have submitted a planning application in June 2019, for a phase of the residential</p>	<p>It is accepted that the SHMA data on specialist housing will become outdated. The Local Plan will be subject to review. The Development Management process will consider new evidence in relation to demand for specialist housing. Future planning applications for specialist housing that would be eligible to provide affordable housing will be identified through the Development Management process.</p>	<p>None recommended</p>	<p>N/A</p>

	<p>element of the allocation to the north of the allocation (application ref. R18/0995) for 'Residential development of up to 275 dwellings (Use Class C3); provision of open space, including means of access into the site (not internal roads) and associated works, with all other matters (relating to appearance, landscaping, scale and layout) reserved. Demolition of buildings referenced A-K and 6 silos', at land at Cawston Farmhouse, South of Coventry Road. Chapter 6: Specialist Housing</p> <p>Paragraph 6.6 and 6.7 quotes the SHMA dated 2014:</p> <p>““The data shows that the HMA is expected to see a substantial increase in the older person population with the total number of people aged 55 and over expected to increase by 35% over just 20 years. A particularly high increase is expected in Rugby with a lower figure being seen in Coventry. For Coventry, this is mainly linked to the younger population age profile in the City and the fact that migration patterns tend to focus on younger people. In the case of Rugby the findings are, to</p>			
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	<p>some degree, related to the higher overall population growth projected for the area. For all areas we are also expected to see significant population growth in the oldest age groups with the population aged 85 and over expected to increase by 111% over the next 20-years.” (SHMA, 2014, P.163).</p> <p>“Given the ageing population and higher levels of disability and health problems amongst older people there is likely to be an increased requirement for specialist housing options moving forward. Such housing can broadly be split into three categories; sheltered, extra-care and residential care. Over the past few years there has been a move away from providing sheltered and residential care housing towards extra-care housing (ECH) and we would consider that the majority of additional specialist housing moving forward is likely to be of ECH.” (SHMA, p168)”</p> <p>The evidence within the SHMA will become dated during the lifetime of the Plan, and there is no timetable or commitment within the Plan for when it will be reviewed and</p>			
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	<p>updated. The SPD needs to allow proper flexibility to deal with circumstances where the evidence of the SHMA does not reflect the latest market signals, or evidence of need. There needs to be allowance for consideration of evidence of local demand as required by paragraph 50 (second bullet point) of the Framework.</p> <p>Paragraphs 6.10 to 6.14 relate to specialist housing and affordable housing and state:</p> <p>”Reading the Local Plan as a whole (as per section 38, para 3(b) of the 2004 Planning and Compulsory Purchase Act), policies H2 (Affordable housing provision) and Policy H6 (Specialist housing) specialist housing developments can be required to provide affordable housing.</p> <p>Policy H2 states that “Affordable housing should be provided on all sites of at least 0.36 hectares in size or capable of accommodating 11 (net) dwelling units or more (including conversions and subdivisions).</p>			
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	<p>It is recognised that residential care/nursing homes aren't usually considered to be dwellings. However, other types of specialist housing may contain units that are sufficiently self-contained as to be considered dwellings. Planning officers will determine whether the residential units being provided are capable of being considered as dwellings on a case by case basis.</p> <p>Where a proposed development would be considered to contribute to the housing target contained within the Local Plan through the provision of dwellings then that development would be expected to comply with affordable housing policies.</p> <p>Where compliance with affordable housing policies is required, it may be appropriate for this to be secured by way of an affordable housing contribution, owing to the challenges in enabling a registered provider (RP) to operate affordable housing within such a wider specialist housing scheme. Consultation with the Strategic Housing team is recommended to</p>			
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	<p>understand demand and RP requirements.”</p> <p>It is agreed that residential care/nursing homes are not usually considered to be dwellings and do not attract a requirement for affordable housing. It is noted in the officers report to committee (Reference: R18/0167) for the site at Oakdale Nurseries, Rugby Road, Coventry, CV8 3GJ for ‘Outline planning permission for the redevelopment of the former Garden Centre / Nursery site to provide a ‘Care Village’ residential retirement development of 124 independent living units and a 36 bed care centre (Use Class C2), all matters except access reserved. (amended scheme), that there was no requirement for affordable housing.</p> <p>With regards to other specialist housing, a flexible approach should be taken, as set out above, on a ‘case by case’ basis.</p>			
Framptons	<p>Chapter 7: Self Build and Custom Housebuilding</p> <p>Paragraphs 7.6 and 7.10 state:</p>	<p>The 12-month marketing period is indicative rather than a set requirement. Should Self-build demand</p>	<p>Please see above text on recommended amendments</p>	<p>Please see above text on recommended amendments on Self-build and custom housebuilding</p>

	<p>“Sustainable Urban Extensions will be expected to provide opportunities for self-build and custom build as part of the mix and type of development.”</p> <p>A threshold approach to delivering self-build and custom housebuilding was rejected by the Planning Inspector examining the Rugby Borough Local Plan due to insufficient evidence of demand.</p> <p>The Council’s Development Strategy Team has engaged with the Council’s Corporate Property Team as to the availability of suitable Council owned land. No suitable sites have been identified so far. Engagement will continue as land availability is not static, so an annual review will take place to identify any suitable sites that may become available.</p> <p>Demand is measured through the Self-build and custom housebuilding register. Since 2016, demand for self-build and custom housebuilding has been met through the granting of suitable permissions or windfall sites. Should demand in the urban area rise above levels of supply,</p>	<p>not be met and plots are required on strategic allocations, the marketing period would be subject to negotiation.</p>	<p>on Self-build and custom housebuilding</p>	
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	<p>developers would enter into discussions with the Council on how to meet this demand. This would involve identifying potential suitable plots, defining phasing plans and separate access works to the non-self build housing elements of Sustainable Urban Extensions (SUEs). Self-build and custom housebuilding plots within SUEs should be concentrated together to safeguard the coherence of a development. The housing mix should conform with the SHMA</p> <p>Planning conditions would stipulate that a marketing strategy would be required. Self-build and custom housebuilding plots will be expected to be marketed for a minimum period of 12 months. Once plots have been marketed for the minimum period, they may then remain on the market as selfbuild and custom housebuilding plots, be offered for purchase to RPs, or be built out by the landowner as appropriate.</p> <p>Self-build and custom housebuilding should only be required where there is a clearly evidenced demand. The published RBC Self-Build and Custom</p>			
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	<p>Housebuilding Register (2019 update) on the page 4 summary concludes “This report demonstrates that Rugby Borough Council has met its requirement to grant sufficient permissions for an equivalent number of plots as those on the self-build and custom housebuilding register” and as stated above the Planning Inspector examining the Rugby Borough Local Plan did not include a threshold approach due to insufficient evidence of demand. The requirement for a marketing strategy in paragraph 7.10 also suggests a lack of evidence for self-build plots. Furthermore, if the LPA seeks to impose an unduly onerous period of time for the marketing, this will frustrate the delivery of self-build and custom-build housing, and could undermine the viability of such developments.</p>			
<p>Barton Wilmore</p>	<p>We have prepared these representations on behalf our Client, Taylor Wimpey UK Limited ('Taylor Wimpey'), who welcome the opportunity to respond to the Rugby Borough Council Draft Housing Needs Supplementary Planning Document (SPD) consultation. Our Client has significant land interests at the South West Rugby Sustainable</p>	<p>The title of the document is considered appropriate as this SPD updates the previous Housing Needs SPD. This document is broader than the previous SPD to reflect changes to the planning system e.g. the introduction of self build and custom</p>	<p>None recommended</p>	<p>N/A</p>

	<p>Urban Extension (SUE), which is allocated for 5,000 dwellings and 35 hectares of B8 employment land under Policies DS3, DS4, DS5, DS8 and DS9 of the Rugby Local Plan, which was adopted in June 2019. We have recently submitted detailed representations to the recent South West Rugby Masterplan SPD Further Engagement Consultation on behalf of Taylor Wimpey. The National Planning Policy Framework (NPPF) defines a Supplementary Planning Document as follows: “Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.” As such, the Draft SPD is expected to be in accordance with the policies of the adopted Local Plan. Paragraph 1.4 of the Draft SPD states that the document will guide the implementation of Local Plan policies H1 – H5: Policy H1: Housing Mix – sets a requirement for developments to provide a mix of</p>	<p>housebuilding. It is also worth noting that the content of the 2012 Housing Needs SPD has now been incorporated into the Local Plan 2019. Each section in the SPD directly responds to a specific policy. The document was checked to ensure it was not proposing the creation of new policy. The SPD seeks to provide a holistic approach to ensure that it is consistent with other SPDs such as Air Quality and Sustainable Design and Construction.</p>		
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	<p>housing type and size in accordance with the Council's latest Strategic Housing Market Assessment (SHMA). New development should take account of specific housing needs including for older people and first time buyers. The policy sets out a number of circumstances where an alternative housing mix may be appropriate.</p> <ul style="list-style-type: none">• Policy H2: Affordable Housing Provision – sets a requirement for 20% affordable housing on previously developed sites of 11 dwellings / 0.36ha or more and 30% affordable housing on greenfield sites of 11 dwellings / 0.36ha or more. The tenure and mix of affordable dwellings should be informed by the SHMA and properties should be integrated to create inclusive communities. Affordable housing should be provided on site unless off-site contributions can be fully justified. If a reduced percentage of affordable housing is proposed, viability evidence should be submitted as part of the planning application.• Policy H3: Housing for Rural Businesses: outlines the policy in respect of single agricultural			
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	<p> dwellings, or those for other countryside workers.</p> <ul style="list-style-type: none"> • Policy H4: Rural Exceptions Sites – sets out where the development of affordable housing outside of settlement boundaries to meet the needs of local people may be acceptable. • Policy H5: Replacement Dwellings – outlines circumstances where replacement dwellings in the countryside may be acceptable. <p>As a general comment, the purpose of the draft SPD appears confused. It goes far beyond the remit of considering ‘housing need’ as the title suggests, and also goes far beyond the requirements of Policies H1 – H5. It considers several other sets of policies including design and low climate change.</p> <p>The scope and title of the final SPD should be clear and consistent to ensure that the SPD is effective in guiding future development in the Borough.</p> <p>Our response to the draft Housing Needs SPD has been split into sections, in accordance with those set out within the consultation document.</p>			
Barton Wilmore	It is noted that there is no section in the Draft SPD which sets out	The proposed wording is considered consistent with	Clarification that this will	3.4 The financial viability of development proposals may change over time due to the

	<p>explicitly that there may be circumstances where it is necessary for a viability case to be run to reduce affordable housing provision, in accordance with the provisions of Local Plan Policy H2.</p> <p>It is however noted that Paragraph 3.4 states:</p> <p>“The financial viability of development proposals may change over time due to the prevailing economic climate, including changing property values and construction costs. In all cases, therefore where the Council have agreed to any reduction below the levels of affordable housing required to comply with the relevant Local Plan policies, the Council may require a viability review of the relevant development with an updated viability assessment to be provided at appropriate intervals to determine whether greater or full compliance with the Local Plan policy requirements can be achieved throughout the carrying out of the relevant development.”</p> <p>Taylor Wimpey object to Paragraph 3.4 as drafted. It is not considered appropriate for multiple viability assessments to take place during the</p>	<p>Policy H2. Wording is to be included to clarify that the approach to viability will be defined in the Section 106 agreement to provide greater certainty for developers.</p>	<p>be defined in the Section 106 agreement to provide certainty on this matter.</p>	<p>prevailing economic climate, including changing property values and construction costs. In all cases, therefore, where the Council have agreed to any reduction below the levels of affordable housing required to comply with the relevant Local Plan policies, the Council may require a viability review of the relevant development with an updated viability assessment to be provided at appropriate intervals to determine whether greater or full compliance with the Local Plan policy requirements can be achieved throughout the carrying out of the relevant development. Any viability review is to be defined from the outset in the Section 106 agreement.</p>
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	<p>lifespan of the development of a site. This is extremely onerous. Any requirement to reconsider viability should be limited to a single point. It is also unclear how any re-examination of viability will be dealt with if it is found that 'greater or full compliance with the Local Plan policy requirements can be achieved.' Given the likely advanced nature of site development it should be clear that any uplift would be secured through off-site contributions.</p>			
<p>Barton Wilmore</p>	<p>4. Design As detailed above, Paragraph 1.4 of the draft SPD states that the purpose of the SPD is to expand on the implementation of Local Plan Policies H1 – H5. Policies H1 - H5 do not comment on the design of residential sites / dwellings. As such, it is considered that much of the content of Section 4 of the draft SPD goes beyond the scope of the SPD as it does not specifically relate to 'housing need' or the relevant Local Plan Policies. Paragraph 4.3 of the Draft SPD references Building for Life 12, which was replaced by Building for a Healthy Life in June 2020. The Council must ensure that the final</p>	<p>Para 1.4 defines the SPD's objectives. Policy H2 defines the requirement for the integration of affordable and market housing. Integrating these housing types to create 'tenure blind' development requires a clear design focus. The design text is consistent with existing Development Management best practice and is not considered to create new policy. The Council recognises that guidance changes over time. However, as Building for Life is the document is</p>	<p>Text on clustering to be revised. Building for a Healthy Life to be included (the document was released after the documents original drafting)</p>	<p>http://www.builtforlifehomes.org/ 4.12 The clustering together of affordable homes should be proportionate to the size of a development. National best practice suggests that no more than around 10 affordable dwellings should be grouped together, although this is informed by a development's size, densities and site constraints/opportunities. The exception to this would be when a site comes forward providing only affordable homes. Engaging Development Management through the pre-application process will inform the layout for individual sites. Engagement with Strategic Housing to inform the design process is also recommended.</p>

	<p>SPD references the correct guidance is being referenced in the final document.</p> <p>Notwithstanding this, we would query the relevance of Building for a Healthy Life here given the purpose of this particular SPD, as detailed above. If the Council are to make reference to the guidance, it should be as a consideration rather than as a requirement given the wide ranging scope of the guidance and its potential for differing interpretation. Paragraph 4.12 of the draft SPD states that ‘National best practice’ suggests that no more than 10 affordable dwellings should be clustered together. It is unclear where this ‘National best practice’ is derived from.</p> <p>The size of clusters should be considered on a site by site basis, taking account of site constraints and individual Housing Association requirements. It should be clear what constitutes a ‘cluster’. For example, this should be based on a run within an individual streetscene (adjacent or opposite) and not include properties which are ‘back to back’.</p> <p>Paragraphs 4.24 and 4.25 acknowledge that Rugby Borough</p>	<p>referenced in the NPPF, no change is proposed in case the document title was to be revised again in the future. The reference to 10 dwellings is not a limit or target but an indicative figure. The purpose of including an indicative figure is to provide an idea of what might constitute a cluster to make the document accessible. The final form of a cluster would be determined through the Development Management process and goes beyond the scope of the SPD, however the wording is to be refined.</p> <p>Text on National Space Standards is included as an example of best practice. The text is very clear that it is not a requirement in Rugby although the Council would like to see the highest standard of development of which National Space Standards provide an example. This serves to signpost developers to best practice</p>		<p>4.12: Affordable homes should not be grouped together in disproportionate numbers. This is informed by a developments size, densities and site constraints/opportunities. A typical example may be that a site may would not be expected to have affordable homes in groups of more than 5-10 dwellings together. This example is for illustrative purposes only and is not a specific requirement. The exception to this principle would be when a site comes forward providing only affordable homes. Engaging Development Management through the pre-application process will inform the layout for individual sites. Engagement with Strategic Housing to inform the design process is also recommended.</p> <p>4.3 ‘Building for Life 12’, as referenced in the NPPF, has been replaced by ‘Building for a Healthy Life 12 (B4L12)’. It is advised that applicants use this guidance to help inform scheme layout and design.</p> <p>4.6 Consultation with Registered Providers (RP’s) on their design requirements is recommended at the earliest possible opportunity to avoid any future delays in RP’s taking ownership of affordable homes. It is recommended that affordable properties be designed to reduce ongoing maintenance requirements. Measures to consider may include keeping communal areas to</p>
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	<p>Council have not adopted national space standards. However, they imply that they may be adopted in the future. Notwithstanding our comments above in respect of the inclusion of design criteria within the draft SPD, Footnote 46 to part f) of Paragraph 127 of the NPPF states: “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.” Rugby Borough’s adopted Local Plan does not adopt national space standards, neither does it provide justification for the need for internal space standards to be set, as required by the NPPF. As such, it is not appropriate for the Housing Needs SPD to introduce any discussion on national space standards.</p> <p>Paragraph 4.26 of the draft SPD suggests that affordable properties will be expected to include measures to create carbon neutral dwellings, including through the use of</p>	<p>and equally ensure the public can see what constitutes design best practice to help ensure the planning system is accessible.</p> <p>The Council has declared a Climate Emergency and it is therefore considered appropriate to make reference to Local Plan policies concerning energy efficiency. The wording is consistent with the Local Plan and does not specify that renewable energy is a requirement for affordable homes.</p>		<p>a minimum and using low maintenance landscaping.</p> <p>4.7 Rugby Borough Council offers a pre-application advice service. This will help inform discussions on matters such as appropriate positioning of parking, bin storage and landscaping for affordable homes: https://www.rugby.gov.uk/info/20084/planning_control/451/pre-application_planning_advice</p> <p>4.10 Building for a Healthy Life 12 (B4L12) recommends providing “Affordable homes that are distributed across a development”.</p> <p>4.13 Building for a Healthy Life 12 (B4L12) recommends:</p> <ul style="list-style-type: none"> • Designing homes and streets where it is difficult to determine the tenure of properties through architectural, landscape or other differences. • Access to some outdoor space suitable for drying clothes for apartments and maisonettes. Consider providing apartments and maisonettes with some private outdoor amenity space such as semi-private garden spaces for ground floor homes; balconies and terraces for homes above ground floor.
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	<p>renewable energy. This is extremely onerous and likely to pose issues for Housing Associations and their maintenance of properties. Notwithstanding our comments above regarding the scope of this SPD, it is considered that a more appropriate approach would be to require all housing to comply with the latest Building Regulations Part L&F to futureproof homes and make them more sustainable.</p> <p>Summary</p> <p>Thank you for the opportunity to comment on the draft Rugby Borough Council Housing Needs SPD. Taylor Wimpey has concerns regarding the scope of the draft SPD. It goes far beyond assisting the implementation of Policies H1 – H5 of the adopted Local Plan and its title is therefore misleading. This must be addressed in the next version of the SPD. Comments have been made above in respect of the delivery of affordable housing, viability, affordable clusters and design. We trust that these comments will assist Rugby Borough Council in developing the next version of the Housing Needs SPD.</p>			
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Historic England	<p>Historic England welcomes the references made to, and aspirations for, design which run through the document. Design elements can make a positive contribution to the historic environment and help develop a sense of place and appreciation of our surroundings. We have no further comments to make on the draft SPD. Do not hesitate to contact me should you have any queries.</p>	Comments noted	None recommended	N/A
Place Partnership (OBO Warwickshire Police)	<p>Place Partnership Limited (PPL) is instructed by Warwickshire Police (WP) to submit representations to the public consultation on the Draft Housing Needs Supplementary Planning Document (DHNSPD). WP's interest in this relates to design matters.</p> <p>In this respect, paragraph 4.1 of the DHNSPD states that the primary source of design guidance is the Council's Sustainable Design and Construction SPD (SDCSPD) and that the purpose of the DHNSPD is to complement this.</p> <p>Part 8 of Appendix B – Residential Extension Design Guide of the SDCSPD accordingly advises those proposing this type of work to visit the Secured by Design (SBD) website (www.securedbydesign.com). Whilst</p>	<p>The Housing Needs SPD 2020 seeks to be consistent with the Council's other SPDs. Warwickshire Police would be consulted as part of the Development Management process. The Council recognises the importance of initiatives such as Secured by Design although the level of detail included in the guidance is a more of a Development Management consideration. A reference to Secured by Design will be included although the primary document for the references included will be the Sustainable Design and Construction SPD.</p>	Inclusion of reference to Secured by Design	<p>4.8 Advice on principles and standards to reduce crime and anti-social behaviour is available online from Secured by Design www.securedbydesign.com</p>

	<p>this remains very good advice, it also needs to be included and expanded upon by the DHNSPD.</p> <p>Doing so would be in accordance with Policy HS1 – ‘Healthy, Safe and Inclusive Communities’ of the Local Plan, which states that proposals should minimise the potential for crime and anti-social behaviour, as well as improving community safety. Turning to affordable housing specifically, SBD has long had a close relationship with this type of development. Design Out Crime Officers (DOCOs) from police forces all over the country work with providers to incorporate proven crime prevention techniques into such homes, such as increasing natural surveillance and encouraging the use of items such as locks that meet ‘Police Preferred Specification’, which means they resist attack by thieves.</p> <p>This is very important in a context where low-income families and vulnerable residents are often more likely to be impacted by crime and anti-social behaviour. This is then exacerbated by the fact that such residents are often less able to replace goods stolen or damaged as a result of such incidents. Installing</p>			
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	<p>SBD would make a real difference to these situations, with research showing that homes with SBD on average suffer 75% less incidents of burglary than those without. This helps explain why National Planning Practice Guidance includes the following segment on this area of design:</p> <p>“Good design that considers security as an intrinsic part of a masterplan or individual development can help to achieve places that are safe as well as attractive, which function well, and which do not need subsequent work to achieve or improve resilience...Good design means a wide range of crimes from theft to terrorism are less likely to happen by making those crimes more difficult.”</p> <p>Paragraph: 010 Reference ID: 53-010-20190722</p> <p>Revision date: 22 07 2019</p> <p>Therefore, WP proposes that the following paragraphs be added to Chapter 4 of the DHNSPD:</p> <p>Secured by Design 4. New dwellings should incorporate Secured by Design principles and standards to help create a low crime and safe environment for the future residents who will occupy them. 4. Secured by</p>			
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	<p>Design guides for residential development are freely available online at www.securedbydesign.com.</p> <p>4. Free help and advice on this subject can also be obtained from Warwickshire Police's dedicated Design Out Crime Officers.</p> <p>The inclusion of this new content would be in accordance with and be supported by:</p> <ul style="list-style-type: none">☐ Paragraphs 8 (b), 11, 16, 20, 28, 37, 91 (b), 95, 124 - 131 of the NPPF;☐ Policy HS1 of the Rugby Borough Council Local Plan 2011-2031 (adopted June 2019); and☐ The National Design Guide (2019). <p>Notwithstanding the above, WP are aware there is an opinion held by some parties that because Part Q of the Building Regulations: Security - Dwellings (October 2015) references SBD, there is no need to do so in planning policy. This is a mistaken notion for two reasons:</p> <ol style="list-style-type: none">1. Only doors and windows are covered by Part Q. No guidance is given on the layout of developments, nor on any other aspect of the design of a development or individual properties.			
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	<p>2. Part Q itself advises in paragraphs 1.2 and 2.2 that in relation to doors and windows (i.e. even in the areas of design it does cover), further guidance should be sought from SBD.</p> <p>There may also be a view expressed that the DHNSPD could contain its own guidance on designing out crime. This would also be an unsound approach because, at best, such text would only duplicate some of the guidance already provided by SBD. Furthermore, any such guidance produced in SPD form, no matter how well initially drafted, will not be updated regularly enough to keep up with the latest best practice and technology in this area. Therefore, such guidance would be soon out-of-date.</p> <p>Overall, if the DHNSPD contains the text recommended by WP and therefore signposts developers to SBD, this will help to deliver housing schemes in the Borough that are safe, attractive and benefit from low crime and anti-social behaviour levels. The residents will in turn largely be freed from the fear of crime as they go about their daily lives, which is arguably the greatest benefit of all. WP hopes this</p>			
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	response is helpful to Rugby Borough Council and look forward to further constructive partnership work as the DHNSPD is prepared.			
Marrons	<p>I am instructed by L&Q Estates to submit the following representations on their behalf in respect of land they control at Cawston. The land is located to the south of Coventry Road and forms part of the South West Rugby allocation.</p> <p>1. The SPD proposes to round up the affordable housing requirement (paragraph 3.5) to the nearest whole affordable unit rather than round down. To require rounding up would be contrary to the Local Plan in which 'a target affordable housing provision of 30% will be sought'. Rounding up may end up being more than 30%. Furthermore, to suggest a fraction seemingly could overly complicate matters, slowing down delivery.</p>	The text on 'rounding up' affordable housing calculations is intended to provide certainty as to how affordable housing is calculated to assist the negotiation process. The requirement for 30% affordable housing is clear so it is not considered necessary to specify that calculations could not exceed 30%.	None recommended	N/A
Marrons	<p>The wording in the SPD is unnecessarily ambiguous in places when it doesn't need to be. The Council should be mindful of paragraph 16(d) of the National Planning Policy Framework that Plans should:</p> <p>contain policies that are clearly written and unambiguous, so it is</p>	<p>Comments noted. The text included is an example from a Section 106 agreement to help provide an idea of expectations. Its inclusion is considered beneficial to the application of Local Plan policies. The wording of the</p>	None recommended	N/A

	<p>evident how a decision maker should react to development proposals; For instance, a. The layout of such schemes should enable this phasing so that affordable and market dwellings can be delivered at the same time. As an example, the Council may expect:</p> <ul style="list-style-type: none"> ☑ No more than 50% of open market dwellings should be occupied prior to completion of 50% of the affordable homes ☑ No more than 75% of open market dwellings should be occupied prior to completion of 100% of the affordable homes. The above is given as an example, but it may set expectations. It is advised that this is either removed, or amended to be the Council's preference and expressed as being subject to negotiation having regard to the particular circumstances of an individual development. 	<p>SPD has been subject to consultation and consideration by the Council's Legal Services Team.</p>		
Marrons	<p>3. Offsite affordable housing contributions are proposed to be calculated using build costs from the Local Plan Viability Assessment, which is now somewhat dated. It is assumed some form of indexation would be applied here, but it is also possible that costs have changed for</p>	<p>The Council is to amend the wording to add flexibility to encourage the use of the most accurate data.</p>	<p>Proposed amended text</p>	<ul style="list-style-type: none"> • Total number of affordable dwellings - Calculated with reference to the requirements of Policy H2. • Build cost of the required dwellings - Build costs will be determined in line with the contents of the Rugby Borough

	Affordable Provision, in light of advances in modular construction etc.			<p>Council Local Plan Viability Assessment or evidence provided on updated costs. The build costs include proposed dwellings and the wider site e.g. landscaping costs.</p> <ul style="list-style-type: none"> • Land cost - The amount an applicant would have to pay a landowner/developer to develop their affordable dwellings on another site i.e. off site. This will be based on the most up-to-date market information. • The amount equivalent to that which would be payable by a registered provider - This information can be sought directly through discussions with registered providers. Where this is not possible, an estimated cost based on available evidence may be provided.
Marrons	4. In terms of the location of affordable housing, it is suggested that no more than 10 affordable dwellings should be grouped together (subject to similar caveats as above – paragraph 4.12). This is an especially low clustering requirement, especially when a development is providing 30%. For instance at L&Q Estates’ interest in Cawston, this would mean having to provide six different clusters. This may not be attractive to	Local Plan Policy H2 states “Development should provide for the appropriate integration of affordable and market housing in order to achieve an inclusive and mixed community.” Design is the main mechanism for achieving this integration. The figure of 10 dwellings is an example. The SPD is clear that this is indicative	Wording to be amended to provide clarification	Please see updated text above

	<p>registered providers in terms of management. The SPD suggests it is national best practice for clusters of up to 10 dwellings, if so evidence of this should be cited. Nevertheless, whilst clustering is accepted, it is suggested that the Council reconsider its approach to clustering to be more bespoke to the scale of development and have regard to a site's characteristics.</p>	<p>and not a target or limit. Providing a specific figure makes the SPD more accessible to members of the community who are not familiar with the Planning system.</p>		
Marrons	<p>5. In terms of the scale and size of affordable housing, the size of the homes should be driven by meeting local housing needs and market signals. There is unlikely to be a demand for many 4+ bed units for affordable housing but there will be so for market housing. Furthermore, garden sizes will need to have regard to the house types and form and the particular circumstances of the site.</p>	<p>Comments noted. The SPD's text is considered consistent with the points raised as scale and size will be driven by need and market signals. The SPD seeks to achieve the highest standards of development quality. When reading paragraphs 4.13 and 4.14 together the SPD is considered to be clear on this matter.</p>	None recommended	N/A
Marrons	<p>6. There is no reference to the proposed Government's First Homes which was consulted upon earlier in the year in 'Changes to the current planning system' August 2020. The</p>	<p>Comments noted. The First Homes Scheme has been consulted on but not yet implemented so the SPD cannot put any weight upon it. The SPD will be</p>	None recommended	N/A

	final SPD should have regard to the proposed changes, which would see at least 25% of all affordable homes delivered as First Homes.	sufficiently flexible to consider the latest government guidance.		
Marrons	7. There is ambiguous drafting in relation to Climate change regarding carbon neutrality that may cause delays in decision making and implementing development: Where possible, affordable housing would be expected to include measures to create sustainable, carbon neutral dwellings and affordable housing will be expected to be in conformity with Local Plan policies concerning climate change, as detailed below: Carbon neutral homes is not an explicit requirement of the Local Plan, and the SPD needs to follow the approach set out in the building regulations, which the Council will be aware are continuously improving from a carbon perspective.	Comments noted. The Council has declared a Climate Emergency. The wording is not considered to be prescriptive and is included for consistency with other SPDs such as the Air Quality and Sustainable Design and Construction SPD.	None recommended	N/A
Warwickshire County Council Planning Policy	Thank you for consulting Warwickshire County Council on this SPD. We have no comments to make on this matter.	Comments noted	None recommended	N/A

<p>Dunchurch Parish Council</p>	<p>DUNCHURCH VILLAGE</p> <ul style="list-style-type: none"> • Dunchurch centre is in a Conservation Area and is a historic village. The Draft Housing Needs SPD needs to take into consideration and respect the existing character of the Village, as it has a great deal of modern housing at present, set amid fields, woods and pleasant open and green spaces. The Village should be retained as individual and separated from Rugby and its distinctive character valued with no reduction in the open space between Rugby and Dunchurch. • Dunchurch Village is identified as a Main Rural Settlement in the RBC Local Plan where extensive development will be permitted outside existing settlement boundaries and within the Parish boundary, including the conversion of existing buildings. The emerging Dunchurch NDP will include a policy to guide the type of housing which comes forward to help ensure new housing supports the Village's future sustainability. • The Government published a revised version of the NPPF in February 2019 setting out a new national threshold for the provision of affordable homes. In Para. 63 of 	<p>Local Plan Policy DS8 concerns South West Rugby, including the buffer between Rugby and Dunchurch. The South West Rugby SPD provides further details on this. The Development Management process determines the final design of new dwellings and requires existing site context is a key reference point for high quality design. The Dunchurch Neighbourhood Plan is welcomed and the Council will offer appropriate support where possible. The Local Plan defines affordable housing requirements in line with the NPPF.</p>	<p>None recommended</p>	<p>N/A</p>
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	<p>the NPPF it states that ‘the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). NPPF Annex 2: Glossary defines major developments as ‘for housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more’.</p>			
<p>Dunchurch Parish Council</p>	<p>COMMUNITY ASPIRATIONS</p> <ul style="list-style-type: none"> • There is evidential support for the provision of appropriate affordable housing in Dunchurch and if possible, tenures should be secured in perpetuity or alternatively via a robust Section 106 Agreement with registered housing providers so that funding from full shared ownership sales receipts can be re-invested into affordable housing. • In the opinion of the DPC, there appears to be a misalignment between the types and sizes of housing in the Dunchurch area and the requirements and needs of the community. As you will be aware, demand is shifting towards smaller homes for an ageing population allowing them to downsize, together with young families and individuals 	<p>Comments noted. The SHMA which supported the Local Plan identifies housing tenure requirements for Rugby Borough and it is accepted that this changes over time. Planning applications should seek to reflect the latest tenure requirements. The Specialist Housing section of the SPD seeks to address the issues raised. Thank you for including the results of the survey. There is currently not a specific design panel at Rugby Borough Council but all planning applications are assessed through the Development Management</p>	<p>None recommended</p>	<p>N/A</p>

	<p>who live on their own. Dunchurch Parish is in an area where the price of open market housing is high and there will be some households who will be unable to purchase open market dwellings if they wish to stay within the Parish boundary.</p> <ul style="list-style-type: none">• There is, therefore, a need in Dunchurch for affordable accommodation which will hopefully meet the increasing demand for the ageing population and young families, together with single occupancy dwellings.• In the Neighbourhood Plan Household Questionnaire Results Final Report 2020, 37% respondents said that the provision of new housing for young families/starter homes was very important, with 41% of respondents saying that it was important. 32% of respondents said that it was very important to have a mixture of privately owned, rented, and shared ownership properties, with 39% saying that it was important• 14% of respondents said that it was very important to have new homes in new developments in Dunchurch, with 33% saying that it was important. 31% said that two-bedroom properties were very	<p>process with design being a central consideration.</p>		
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	<p>important and 51% said it was important. 32% said that three-bedroom houses were very important, with 50% saying that it was important.</p> <ul style="list-style-type: none">• The DPC also acknowledges that the eldest age population group (those aged 85 and over) is projected to increase by over 190% by 2035. As you have mentioned in the consultation, RBC will need to consider the effects, and to respond to, the ageing population with a focus on the provision of this changing demographic. Whilst the NPPF has recognised this trend, RBC should look at the provision of additional forms of supported housing for the elderly in a strategic and creative way. This should also apply to those people who have disabilities.• The above aspirations should support decisions that are responsive to local circumstances and support housing developments that reflect local needs.• Developments of more than twenty dwellings or those of a sensitive nature, potentially affecting any existing housing and / or the local character of Dunchurch should go through the local design review			
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	<p>process. Any comments made by the RBC Design Review Panel should be taken into consideration prior to the determination of all planning applications and may be necessary for smaller scale developments where there is any sensitivity which would affect the site.</p> <ul style="list-style-type: none"> • Whether a development is referred to the RBC Design Panel should be established at the pre-application stage which may avoid any unnecessary delays. • In Dunchurch Village, the average price of a semi-detached property is £236,000 which is slightly lower than the national average of £239,000. Assuming a 15% deposit, those entering the property market in the area would require £35,400 as a deposit with a household income of at least £40,000. This kind of funding is obviously out of reach for many young people aspiring to purchase a starter home. 			
Dunchurch Parish Council	<p>DUNCHURCH PARISH COUNCIL VIEWS</p> <ul style="list-style-type: none"> • Dunchurch PC supports an increase in the housing supply in the area, however it should meet demand, be sustainable and be supported by the required services and infrastructure. Dunchurch PC would prefer to see 	<p>Comments noted. Section 106 agreements and Planning conditions would enforce local connection criteria.</p>	<p>None recommended</p>	<p>N/A</p>

	<p>organic growth in the housing supply.</p> <ul style="list-style-type: none"> • Dunchurch Parish Council believe that they should be actively consulted in the determination of the mix of affordable homes tenures that best meet local needs. • Affordable housing in rural areas, such as Dunchurch, are usually built on exception sites which are adjacent to, but outside the Village boundary, and RBC should ensure that the dwellings built are for people with a local connection, in perpetuity, and cannot be sold on the open market. <p>I very much hope that the Cabinet of Rugby Borough Council will take account of these points and amend this Plan, where necessary.</p>			
Resident	<p>Object: Too many houses. Not enough social housing. Erosion of countryside. Even more traffic. Rugby is being ruined you cant have people all moving from bad towns to nice towns.</p>	<p>The housing requirements for Rugby Brough were considered in the Local Plan, which was subject to examination and was adopted in June 2019. The Housing Needs SPD 2020 seeks to support the delivery of affordable housing.</p>	None recommended	N/A
Inland Waterways Association	<p>The IWA (Warks branch) offers general support but it is not in our</p>	<p>Comments noted</p>	None recommended	N/A

	remit to comment on specific items of this nature.			
Nuneaton and Bedworth Borough Council	Thank you for consulting the Borough Council on the SPD. No comments to make on the documents at this juncture.	Comments noted	None recommended	N/A
Other amendments	Post-consultation updates to amend the date from '2020' to '2021'. Grammatical change to reflect date of anticipated adoption. Grammatical changes to Para 1.4 to reflect the end of the consultation.	Amend date from '2020 to 2021'	Amend date from '2020 to 2021'	2020 2020
Other amendments	SEA Screening Report	SEA Screening Report	SEA Screening Report	Appendix 2 – Strategic Environmental Assessment Screening Report TBC after consulting the consultation bodies. SEA Screening Report link tbc