

RUGBY BOROUGH LOCAL PLAN

2011-2031

HOUSING BACKGROUND PAPER

SEPTEMBER 2017



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1. INTRODUCTION

1.1. This Background Paper has been produced to support the Rugby Borough Submission Local Plan 2011-2031.

1.2. The purpose of the paper is to outline the evidence and options considered in developing the housing target and distribution strategy proposed within the Submission Local Plan.

1.3. The paper takes the following structure and sets out:

- The process that has led to the identification of the objectively assessed housing need and the housing target in the Local Plan is outlined;
- An up to date Rugby Borough housing land supply, including details of recent completions;
- Details of the spatial options considered in the development of the Distribution Strategy are introduced;
- Commentary on the assessment of proposed land allocations. This includes omission sites submitted to the Council for consideration during the plan making process which are not proposed for allocation. This section is structured with reference to the settlement hierarchy; the urban area is discussed first, before the rural area by hierarchy levels; and
- The implications of proposed site allocations for the phasing of housing delivery during the plan period.

1.4. This Paper should be read alongside the evidence that it refers to, namely:

- GL Hearn – Coventry and Warwickshire Joint Strategic Housing Market Assessment (2013);
- GL Hearn - SHMA Annex: 2012-based Sub-National Population Projections and Economic Forecasts: Implications for Housing Need in Coventry and Warwickshire (2014);
- GL Hearn – SHMA Update: Updated Assessment of Housing Need: Coventry and Warwickshire HMA (2015)
- JG Consulting – Coventry-Warwickshire Housing Market Area: 2014-based Subnational Population and Household Projections (2016)
- Rugby Borough Council - Strategic Housing Land Availability Assessment (2015);
- Rugby Borough Council – Strategic Housing Land Availability Assessment (2016);
- Rugby Borough Council – Strategic Housing Land Availability Assessment Addendum (2017)
- LUC - Sustainability Appraisal Preferred Option (2015)
- LUC - Sustainability Appraisal Local Plan Publication Draft (2016);
- GL Hearn – Housing Delivery Study (2015);
- Warwickshire County Council - Assessment of Option Information: Phase One (2015);
- Warwickshire County Council – Assessment of Option Information: Phase Two (2015);
- Warwickshire County Council (Vectos) - Strategic Transport Assessment (2016);
- Warwickshire County Council (Vectos) – Strategic Transport Assessment (2017);

- Warwickshire County Council Landscape Architects - Rainsbrook Valley Landscape Sensitivity Study (2017);
- Rugby Borough Council - Rural Sustainability Study (2015); and
- Rugby Borough Council - Site Allocation Development Packs for the Main Rural Settlements (2016).

1.5. Each of these documents is available on the evidence base pages of the Council's website.

2. THE OBJECTIVELY ASSESSED HOUSING NEED, HOUSING SUPPLY AND LOCAL PLAN HOUSING TARGET

- 2.1. One of the key decisions the Borough Council has to make when writing a Local Plan is how many homes will be needed within the plan period. The purpose of this section is to outline the evidence that has informed the objectively assessed housing need and the housing target included within the Submission Local Plan.
- 2.2. The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) set out a clear approach to defining housing need and then developing a housing target. This is summarised in Figure 1 below. First, an Objectively Assessed Housing Need (OAN) for Rugby Borough must be identified. Then the following must be considered:
- Unmet need from other areas;
 - Land supply, constraints and sustainability appraisal;
 - Providing an appropriate response to market signals and meeting the need for affordable housing; and
 - Aligning the housing and economic strategy.

Step 1: Objectively Assessed Need for Housing in Rugby Borough

- 2.3. The National Planning Policy Framework (NPPF) (March 2012)¹ sets a presumption in favour of sustainable development² whereby Local Plans should meet the objectively assessed need for housing with sufficient flexibility to respond to rapid change, unless the adverse impacts of doing so would significantly or demonstrably outweigh the benefits or policies within the NPPF taken as a whole or specific NPPF policies indicate that development should be restricted.
- 2.4. Paragraph 47 of the NPPF sets out that to significantly boost the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies in the framework, including identifying key sites which are critical to the housing strategy over the plan period.
- 2.5. The core evidence for housing requirements is a Strategic Housing Market Assessment (SHMA) for the housing market area. The preparation of a SHMA is intended to be the primary means of determining policies for future housing provision.

Strategic Housing Market Assessment

- 2.6. Paragraph 159 of the NPPF states that local planning authorities should have a clear understanding of housing needs in their area. Authorities must produce a SHMA to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.
- 2.7. The NPPF outlines that a SHMA should identify the scale and mix of housing and the range of tenures which the local population is likely to need over the plan period which:

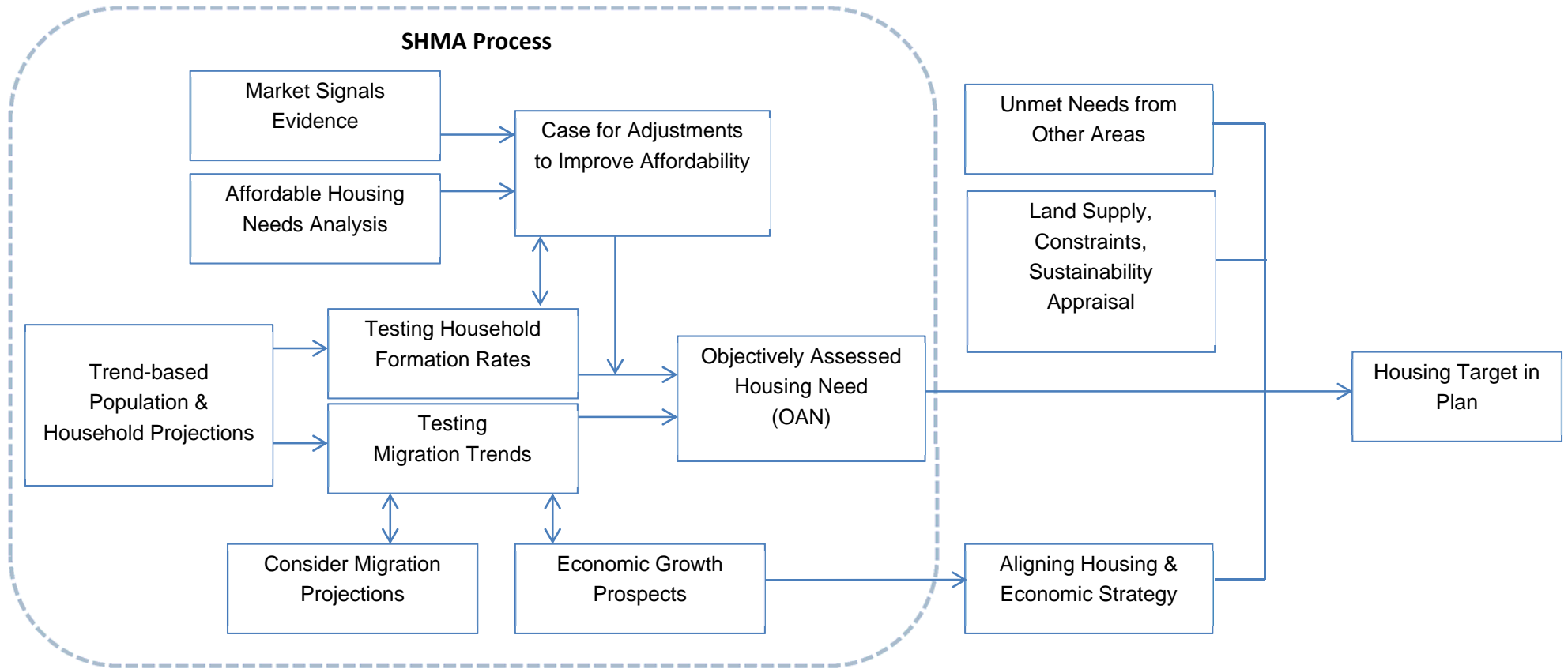
¹ <http://planningguidance.planningportal.gov.uk/>

² Paragraph 14

- Meets household and population projections, taking account of migration and demographic change;
- Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community; and
- Caters for housing demand and the scale of housing supply necessary to meet this demand.

2.8. A joint SHMA (JSHMA) was commissioned by the Coventry and Warwickshire authorities including Rugby Borough Council (with the exception of Stratford on Avon District Council initially). The Council considered this to be the housing market area in which the authority is located. The justification for this study area is contained within the JSHMA evidence itself; this has been accepted as a sound HMA for assessment by Inspectors during the examination of Coventry City, Stratford District and Warwick District Councils' Local Plans.

Figure 1: Identifying a Housing Target



Reference: Strategic Housing Market Assessment, 2015. GL Hearn.

- 2.9. The first Joint JSHMA was published in 2013³. This was followed by an Annex that took account of updated household projections in 2014⁴ (Stratford on Avon District Council became part of this commission). A further update of evidence was undertaken in 2015⁵ and is the Council's most up to date evidence, which informed the Preferred Option.
- 2.10. The methodology employed to undertake the JSHMA is shown in Figure 1 above. The findings of the JSHMA process are outlined in detail within the 2015 report and will therefore not be repeated here.
- 2.11. The JSHMA has identified an objectively assessed housing need for Rugby Borough of 9,600 dwellings between 2011 and 2031.

Step 2a: Considering unmet needs from other areas

- 2.12. As stated in the introduction to this section, a housing target can only be arrived at once the land supply and constraints of an area have been considered. Each of the authorities within the Coventry and Warwickshire area are at a differing stage of plan making process. . Of most significance to Rugby Borough is the capacity of Coventry City to provide housing.
- 2.13. The NPPF states: *“Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.”* [para 179].
- 2.14. Paragraph 182 of the NPPF is also clear that plans should be positively prepared, meeting unmet needs from neighbouring authorities *“where it is reasonable to do so and consistent with achieving sustainable development.”*
- 2.15. In September 2014 Coventry City Council published a consultation document on its Emerging Local Plan entitled Delivering Sustainable Growth⁶. In that document Coventry City Council acknowledged the conclusions of the JSHMA Annex (2014) and the higher levels of housing provision it indicated was required in the city. However, the document also reported that, on the basis of evidence available at that time, there would be a shortfall of up to 13,720 dwellings against these requirements because of capacity constraints within the City Council's administrative area.
- 2.16. Since this initial indication of a capacity issue, the Coventry and Warwickshire planning authorities have worked together to identify a distribution of housing that will meet the full objectively assessed needs identified within the JSHMA 2015 update and address the capacity issue demonstrated by Coventry City Council. This work culminated in a Memorandum of

³ https://www.rugby.gov.uk/downloads/file/194/strategic_housing_market_assessment_shma

⁴ https://www.rugby.gov.uk/downloads/file/195/strategic_housing_market_assessment_shma_-_annex

⁵ https://www.rugby.gov.uk/downloads/file/194/strategic_housing_market_assessment_shma_joint_update

⁶ http://www.coventry.gov.uk/downloads/download/3346/the_new_coventry_local_development_plan_-_delivering_sustainable_growth

Understanding between the Coventry and Warwickshire authorities that was formally endorsed by Rugby Borough Council on 27 October 2015⁷.

- 2.17. Against the need identified within the JSHMA 2015 update the City has a shortfall of 17,800 dwellings between 2011 and 2031 and this will be distributed between the Warwickshire authorities. The agreed redistribution methodology results in 2,800 of those dwellings being provided within Rugby Borough during the 2011-2031 plan period.
- 2.18. Coventry City Council's Local Plan hearing sessions ended in January 2017 with a follow up consultation on proposed modifications taking place in March and April. The City Council is currently awaiting the Inspector's report and are hopeful for adoption before the end of the year. Warwick District Council's Local Plan Inspector's Report was issued on 28 July 2017 and the Local Plan was adopted on the 20th September.
- 2.19. At each of the respective examinations the SHMA evidence was examined. Further evidence was produced at Coventry City Council's examination, which was also utilised at Warwick District Council's examination, in the form of an updated report analysing the ONS Subnational population projections (2014-based), CLG household projections (2014-based) and the 2015 mid year population estimates, with regard to housing need in the Coventry and Warwickshire Housing Market Area (HMA). The analysis built on information in the JSHMA 2015 update which used 2012-based projection data to underpin a number of demographic and economic scenarios – ultimately leading to conclusions about housing need across the HMA.
- 2.20. The 2016 report⁸ concluded that overall, when considered on the same basis as the JSHMA 2015 update, the objectively assessed need in the HMA should be for 4,237 dwellings per annum (2011-31) – this is 35 fewer than was shown in the JSHMA 2015 update. This updated analysis, taking account of more recent published data, does not suggest any fundamental differences from the analysis and conclusions as set out in the JSHMA 2015 update. Whilst some figures for individual local authorities changed slightly, the report concluded that, at the HMA level the assessed level of need in the JSHMA 2015 update (and linked to 2012- based data) remains sound. For Rugby Borough Council the number decreased from 464 dwellings per annum, as contained in the JSHMA 2015 update, to 436 dwellings per annum.
- 2.21. The Council considers that a 1% difference shown by the 2014-based Projections across the HMA is minimal and does not affect the robustness of the evidence base. The PPG (2a-016) is clear that housing assessments are not rendered outdated every time new projections are issued. It is however relevant that the latest official projections show a strengthening of recent trends in terms of the distribution of need across the HMA including a lower housing need in Rugby Borough and a higher housing need in Coventry.
- 2.22. The distribution methodology for the unmet need emanating from Coventry City Council as contained in the Coventry and Warwickshire Housing Memorandum of Understanding was also subject to scrutiny at the Examination of the respective Local Plans and has been accepted by the Warwick Local Plan Inspector.

⁷ <https://www.rugby.gov.uk/meetings/meeting/634/council>

⁸ Coventry and Warwickshire Housing Market Area : 2014-based Subnational Population and Household Projections – August 2016

Step 2b: Land Supply, Constraints, Sustainability Appraisal

Land Supply – Strategic Housing Land Availability Assessment (SHLAA)

- 2.23. At 1 April 2017 a total of 9,248⁹ dwellings are committed¹⁰ and considered to be developable in Rugby Borough but not all of these dwellings will be built within the plan period. It is anticipated that 6,532 permitted dwellings will be completed between 1 April 2017 and 31 March 2031. In addition 630 dwellings are expected to come forward on windfall sites between 1 April 2017 and 31 March 2031. So, the total housing supply at 1 April 2017 is 9,739 dwellings. The number of dwellings required to be allocated in the Plan is 2661 dwellings (Local Plan target of 12,400 minus the housing supply of 9,739 dwellings). A full housing trajectory detailing the assumptions made about the phased delivery of these dwellings within and beyond the emerging Local Plan period is provided separately¹¹.
- 2.24. The Strategic Housing Land Availability Assessment (SHLAA) contains information and assessment on sites submitted for consideration as part of the development of the emerging Local Plan, outlining evidence about capacity for development within the Borough. The total quantity of housing that could be provided on sites the SHLAA has concluded are suitable, available and achievable is 18,451 dwellings¹²; this is broken down by location in Figure 2 below. It should be noted that the SHLAA was undertaken at various points throughout the development of the Local Plan with Call for Sites exercises held at the following stages: to inform the 2013 SHLAA, a further call for sites in summer 2014, further call for sites submissions during the Preferred Options consultation Dec 2015 – Feb 2016. Any sites submitted as part of the different Local Plan consultation stages were also considered.
- 2.25. This paper provides an update on the SHLAA scenario capacity table taking account of updated evidence, planning permissions and discussions held with site promoters since the SHLAA was published in 2015.

Figure 2: Capacity Identified in the SHLAA (Source: SHLAA, 2015)

| Capacity Scenarios | Capacity (Dwellings) |
|---|----------------------|
| Rugby Urban Area- within settlement boundary | 130 |
| Rugby Urban Edge (Countryside) | 9,117 |
| Rugby Urban Edge (Green Belt) | 376 |
| Main Rural Settlement - within settlement boundary | 15 |
| Main Rural Settlement – outside settlement in Countryside | 263 |
| Main Rural Settlement – outside settlement boundary in the Green Belt | 963 |
| Coventry Urban Edge (new settlement) sites – within Green Belt | 3,899 |
| Open Countyside (new settlement) sites – non Green Belt | 3,688 |

⁹ Sites over 5 dwellings or more

¹⁰ Committed sites are those sites that have full or outline planning permission

¹¹ Local Plan Housing Trajectory (21 June 2017)

¹² SHLAA inclusive of sites received during the Publication Draft consultation period

- 2.26. The combination of currently committed sites and those found to be developable or deliverable within the SHLAA indicates that there is sufficient land supply within Rugby Borough to deliver housing that would meet the needs of Rugby Borough and also accommodate growth from Coventry.

Constraints

- 2.27. The Green Belt in Rugby Borough is part of the larger West Midlands Green Belt and is the most significant constraint to development within Rugby Borough. The SHLAA has concluded that many sites within the Green Belt are suitable for development if they were not located within this area of constraint.
- 2.28. The NPPF is clear that once established Green Belt boundaries can only be altered in exceptional circumstances. The SHLAA indicates that there is theoretical capacity for 13,213 dwellings outside the Green Belt. A full analysis about whether the required levels of housing can be delivered, outside the Green Belt, within the plan period is contained within section 3 of this document.
- 2.29. In addition to consideration of the Green Belt the full range of planning constraints were considered through the SHLAA and Sustainability Appraisal processes; further details are set out in those reports.

Sustainability Appraisal

- 2.30. A Sustainability Appraisal Report has been undertaken by consultants LUC, on behalf of Rugby Borough Council, detailing the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the emerging Rugby Borough Local Plan.
- 2.31. Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment, and set the framework for future consent of projects requiring Environmental Impact Assessment (EIA). The purpose of SEA, as defined in Article 1 of the SEA Directive is 'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'.
- 2.32. The reasonable alternative site and policy options, as well as the policies and site allocations included in the Publication Draft Local Plan, have been subject to a detailed appraisal against the SA objectives which were developed at the scoping stage of the SA process. The SA concluded that the Publication Draft Local Plan allocates sites which will provide a large amount of housing, employment and other development across Rugby to meet the future needs of the Borough, as well as some of the unmet housing need for Coventry City.
- 2.33. For many of the sites assessed the SA identified the potential for negative effects against environmental objectives including biodiversity, cultural heritage and landscape. However, in

general, the proposed allocated development sites would have fewer significant negative effects than the alternative options considered. While some potential negative effects do exist, these generally reflect the widespread constraints within the Borough, for example in terms of the broad extent of high quality agricultural land and the wide distribution of biodiversity and geodiversity designations. The draft Local Plan also proposes a wide range of development management policies, aiming to protect and enhance the economic, social and environmental conditions of the Borough. When applied to the proposed allocations they will require mitigation of the potential negative effects identified through the SA of the proposed allocations.

Step 2c: Aligning the Housing Provision and the Economic Strategy

- 2.34. As also set out in the Council's Employment Background Paper, the updated SHMA (2015) considers the alignment of housing and employment growth by looking at the impact of Rugby's OAN on labour force and jobs growth (Table 26, p.71). Here it is explained that a Rugby housing need derived from the 2012 SNPP would be expected to deliver a growth of approximately 6,000 additional people in the resident labour force. This would equate to supporting a very similar number, if additional jobs were required due to Rugby's adjustment factor (considering commuting patterns, 'double jobbing' and employment rates) being almost equivalent to a 1:1 ratio (0.98) of labour supply and jobs.
- 2.35. It is important to note, however, that growth of around 6,000 in labour supply is for the period 2014-31 and not the entire plan period of 2011-31. The 2015 SHMA goes on to state (para. 4.64, p.77 and Table 29) that an indicative figure regarding the scale of employment growth for Rugby from 2011-31 would be 8,600 jobs. This aligns closely with the labour demand forecast in the Rugby Employment Land Study, 2015, based on the Cambridge Econometrics data, which is slightly lower at 8,500 additional jobs growth forecast.
- 2.36. The Employment Background Paper also explains in section 5 that the Council has considered employment needs under the Duty to Co-operate across the sub-region. A Memorandum of Understanding (MOU) was agreed in July 2016 by the Coventry and Warwickshire authorities to "seek to ensure that the employment land needs of Coventry and Warwickshire are met in full including addressing an identified shortfall of employment land provision arising in Coventry.". In addition to setting out the total amount of employment land to meet the needs of Coventry and Warwickshire the MOU also states that Coventry has identified a shortfall of 241 ha of employment land to be found within its own boundaries, and therefore redistribution is required to the Warwickshire local authority areas.
- 2.37. Based on the redistribution approach to Coventry's housing shortfall, and the addition of commuting flows between Coventry and neighbouring authorities, the employment land MOU seeks to ensure that planned housing growth over the plan period, including redistribution to Rugby from Coventry, will be aligned with proposed employment developments in Rugby Borough. As set out in Table C at paragraph 4.6.2 of the MOU the unmet need for employment development to be redistributed from Coventry to Rugby Borough equates to 45 hectares.

- 2.38. Rugby Borough already includes two major employment sites near to Coventry, Prologis Ryton and Ansty Park, which are for the most part now developed (with the remaining land on site being committed development). Completions on both sites have been since 2011 and therefore contribute to the employment land requirement identified to meet Coventry's shortfall. The contribution from both sites is 97 hectares (gross).
- 2.39. In summary, it is considered that the levels of employment provision proposed within the Submission Local Plan align with the housing provision required to meet Rugby Borough's OAN. Account has also been taken of meeting Coventry's shortfall of both housing and employment land as detailed in the Housing and Employment MoUs.

A housing target for Rugby Borough

- 2.40. As set out in Paragraphs 2.11 - 2.22 above, the JSHMA 2015 identified an objectively assessed housing need figure for the Borough of 9,600 dwellings within the plan period. However, it was demonstrated that there will be unmet housing need emanating from Coventry City following the publication of the authority's SHLAA. The City Council's SHLAA was examined by the Warwickshire authorities and it was agreed that Coventry could not accommodate all of its own full objectively assessed need within its administrative boundary, with a resulting shortfall of 17,800 dwellings. Coventry City Council's Local Plan is currently at the latter stages of the examination process with the Inspector's Report expected in September 2017 and it remains the case that the authority is unable to meet its full objectively assessed need. The level of unmet need from the housing market area is a matter that Rugby Borough Council has had to consider throughout the development of the Local Plan.
- 2.41. As part of Duty to Cooperate discussions a redistribution methodology based on a functional relationship (migration and commuting flows) between Coventry and the Warwickshire authorities was developed and agreed in the Memorandum of Understanding (MoU) between the Coventry and Warwickshire authorities. This resulted in 2,800 dwellings being distributed to Rugby Borough. The housing target therefore becomes 12,400 dwellings in the plan period.

Figure 3: Components of the Housing Target

| | Total (2011-2031) |
|--|--------------------------|
| Rugby Objectively Assessed Housing Need | 9,600 |
| Coventry Unmet Need | 2,800 |

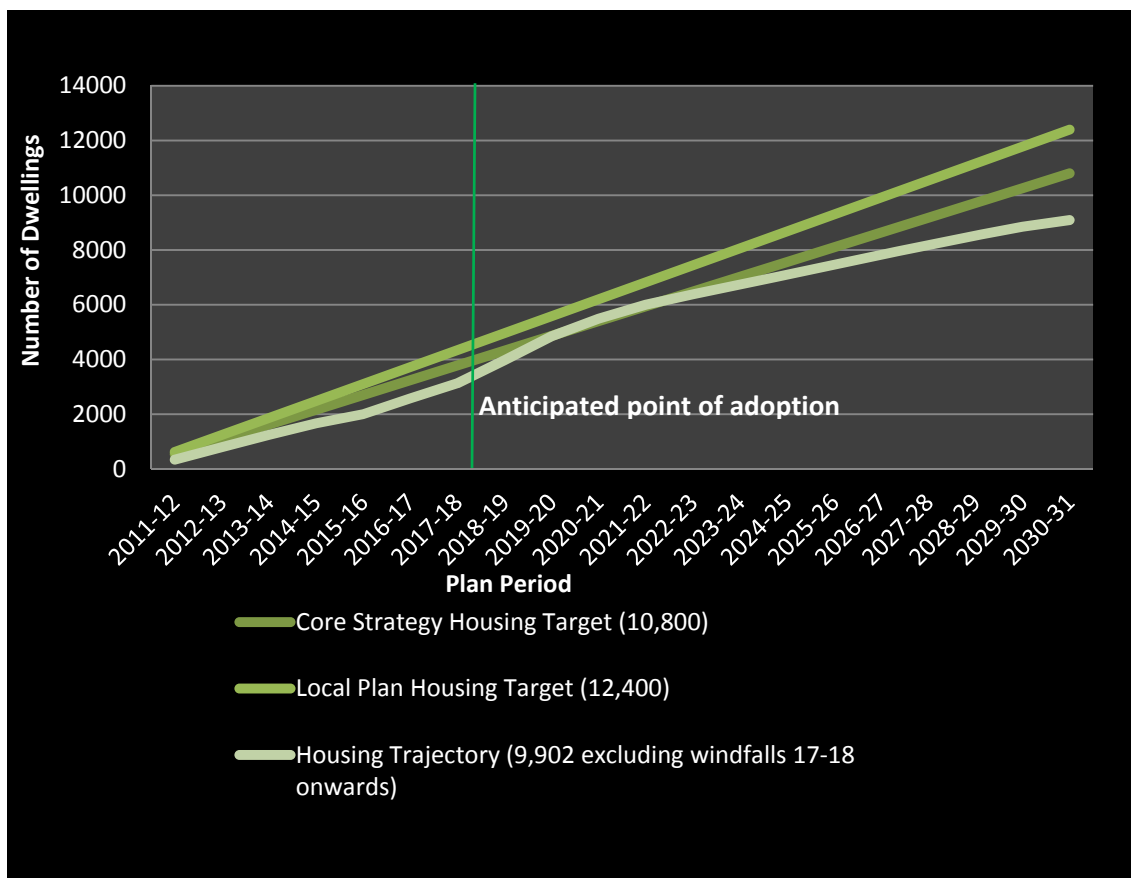
- 2.42. All of the authorities within the housing market area, with the exception of Nuneaton and Bedworth Borough Council, are planning to meet their respective housing MoU redistribution figure. Nuneaton and Bedworth Borough Council Publication Local Plan was submitted to the Secretary of State for independent examination on 6 June 2017. The Plan sets out that they are unable to meet the redistributed figure by 1,690 dwellings.
- 2.43. A joint response to Nuneaton and Bedworth Borough Council Publication Plan was produced by Warwick, Stratford, Coventry, Rugby and North Warwickshire authorities objecting to the Plan on the basis of Duty to Cooperate and its view that the unmet need from the HMA can be met through alterations to the existing Plan. Following the submission of the Plan, officers within the HMA have had ongoing positive discussions to resolve the shortfall position presented in the Plan. It is therefore viewed that the Housing MoU will not need to be revisited. The interim findings have been published.
- 2.44. Paragraph 2.23 above details the Council's current position on land supply against the target of 12,400. In order for the Local Plan to accord with national planning policy it is therefore necessary to make allocations in the Local Plan to ensure the delivery of 12,400 dwellings within the plan period. If this housing target were to be achieved as an annualised average across the plan period, a total of 620 dwellings per annum would be required. The following paragraphs consider the performance against this target to date and how this target could be delivered across the plan period.

Performance against the housing target to date

- 2.45. During the period of April 2011 to March 2017, 2,577 dwellings have been delivered within Rugby Borough. Against the proposed housing target of 620 per annum, the requirement in the same period of time would have been 3,720. There is therefore a shortfall of 1,143 dwellings within this period. It should also be noted that there is also a shortfall of 663 dwellings when measured against the Rugby OAN only within the same time period.
- 2.46. As shown in Figure 4 below, based on the current housing trajectory (see Appendix 1) the Council will consistently have a shortfall against the proposed housing target throughout the plan period, with a total shortfall over the whole Plan period of 3,291 dwellings¹³. As outlined above, there will also be an under delivery at the time of adoption of the Local Plan. There are two implications that will result from this circumstance: meeting the shortfall and accounting for persistent under-delivery.

¹³ Excluding windfalls sites of 4 dwellings or less

Figure 4: Housing Trajectory – Cumulative target and commitments



- 2.47. The first implication is that this shortfall will need to be addressed by the Plan. The Planning Practice Guidance (3-035) states that local planning authorities should aim to deal with any under-supply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the [duty to cooperate](#). The Council has a sufficient supply of land to meet the under- supply and is in a position to do so within the first five years post adoption.
- 2.48. In addition to this requirement to address the shortfall in the first five years post adoption, the implications of paragraph 47 of the National Planning Policy Framework (NPPF) must be considered. This places a requirement upon local planning authorities to demonstrate a five year housing land supply and contains implications for the calculation of this supply where an area can be considered to have ‘persistently under delivered’. In these circumstances, a 20% buffer should be applied to housing targets, with delivery moved forward from later in the plan period.
- 2.49. As shown in Figure 5 below, the Borough Council has consistently under delivered against the current adopted housing target set out in the Core Strategy of 10,800 dwellings or an

annualised rate of 540 dwellings. The 20% buffer is therefore applied to calculations of five year supply against the current adopted target and the under-supply.

Figure 5 - Completions against the housing target

| | 2011/12 | 2012/13 | 2013/14 | 2014/15 | 2015/16 | 2016/17 |
|-------------------------------|---------|---------|---------|---------|---------|---------|
| Core Strategy Target | 540 | 540 | 540 | 540 | 540 | 540 |
| Actual Net Completions | 338 | 456 | 448 | 425 | 534 | 376 |

- 2.50. As highlighted in Figure 5 above this position is unlikely to change before the point of adoption, with the number of dwellings currently in supply being lower than both the current adopted housing target and the annualised housing target of 620 dwellings per annum. The Council considers that, at adoption, it will be required to demonstrate a five year land supply that delivers sufficient housing to resolve the identified shortfall, within the first five years, plus the 20% buffer required by the NPPF. In order to provide a conservative assumption of requirements, it is currently assumed that the 20% buffer will apply for the first five years post adoption as during this period the authority would need to demonstrate that it has consistently achieved the housing target.
- 2.51. Should the housing target of 620 be backdated to 2011, at the anticipated time of adoption (2018), the Borough Council would need to plan for 1,024 dwellings per annum for the first five years of the plan based on adoption after April 2018.

Figure 6 - Annualised Requirement based on a backdated housing target

| | | |
|----------|---|------------|
| A | Local Plan Annualised requirement | 620 |
| B | Five Year Housing Target at point of adoption (2011/12-2017/18) (A*7) | 4340 |
| C | Anticipated Completions (2011/12-2017/18) | 3173 |
| D | Undersupply (B-C) | 1167 |
| E | 5 year requirement 2018/19-2022/23 (A*5 +D +20%) | 5120.4 |
| H | Annualised requirement 2018/19-2022/23 (E/5) | 1024 |

- 2.52. However, the Council considers that it would be unreasonable to expect the target of 620 to be applied retrospectively back to 2011. This is based on the fact that the Council, through its Core Strategy has been planning for a housing target sufficient to meet the objectively assessed need for Rugby Borough of 480 dwellings (“policy off”). The uplift to 620 is only as a result of the Borough Council committing to play its role in meeting the unmet need within the housing market area identified in the most recent JSHMA.
- 2.53. Further, as the following sections of this paper demonstrate, the initial high annual target will be unachievable due to the availability of sites and inability of the market to deliver such a rapid increase in annual delivery rates. In order to meet the high annual target of 1,024

dwellings shown in Figure 6 above it is likely that land in unsustainable locations would have to be released for development. The NPPF is clear, as stated, that whilst unmet need from another area can be provided for, this should not happen to the detriment of sustainable development.

- 2.54. It is therefore considered that from the start of the plan period at 2011 to the point of adoption (2018/19), the Publication Draft Local Plan utilises a phased housing target of 540 dwellings per annum. This figure is the current housing target contained within the adopted Core Strategy (plan period 2006-2026). This approach means that since 2011 the Council has been planning for more than its own OAN of 480 dwellings per annum and as such some of Coventry's unmet housing need would have already been accounted for by the time the Local Plan will be adopted.
- 2.55. As set out in Figure 7 below, at the point of adoption the Publication Draft Local Plan proposes the annual housing target increases from 540 to 663.07 dwellings per annum. This housing target is reached by subtracting 3,780 (the cumulative housing requirement prior to the Local Plan adoption) from the overall housing target of 12,400, then dividing the remaining requirement for 2018 - 2031 of 8,620 dwellings by 13 (the remaining number of years in the plan period at the point of adoption).

Figure 7: Publication Draft Local Plan Phasing

| Phase | Plan Period | Target Per annum | Cumulative requirement |
|--------------|-----------------|------------------|------------------------|
| 1 | 2011/12-2017/18 | 540 | 3,780 |
| 2 | 2018/19-2030/31 | 663 | 8,620 |
| Total | | | 12,400 |

- 2.56. Figure 8 demonstrates how the housing target will be calculated for the first years of the period, post adoption.

Figure 8: NPPF compliant annual target at the point of local plan adoption

| | | |
|----------|--|------------|
| A | Annual requirement at point of adoption (pre 2018/19) | 540 |
| B | Five Year Housing Target at point of adoption (2011/12-17/18) (A*7) | 3,780 |
| C | Anticipated Completions (2011/12-2017/18) | 3,173 |
| D | Under- supply at the point of adoption 2018/19 (B-C) | 607 |
| E | Coventry's unmet need annualised across post adoption plan period $((2,800 - ((540-480)*7)) / 13)$ | 183.07 |
| F | Rugby OAN annualised | 480 |
| G | Plan Target Post Adoption 2018/19 – 2030/31 (E+F) | 663.07 |
| H | 5 year requirement 2018/19-2022/23 $(G*5 + D + 20\%)$ | 4707 |
| I | Annualised requirement 2018/19-2022/23 $(G/5)$ | 941.36 |

- 2.57. To understand how the Council's planned housing delivery will perform, subsequent sections of this Paper consider different spatial options within the Borough and their capability of providing 941 dwellings per annum for the first five years of the plan (post adoption) then lowering the provision to 696 dwellings, with the buffer returning to 5%. It is assumed within this paper that the buffer does not increase the housing target and that this approach does not take account of managed supply i.e. impact of over/under supply against the housing target on an ongoing basis throughout the plan.

Conclusion

- 2.58. As stated, the Local Plan contains a housing target for Rugby Borough of 12,400 dwellings for the plan period 2011-2031. The housing target per annum post adoption has been outlined above. Figure 4 has clearly demonstrated that to achieve this, the Council will be required to allocate further land for housing. The following sections of this paper turn to the distribution strategies options considered and the preferred strategy selected to achieve this objective.

3. THE DISTRIBUTION OF HOUSING, PROPOSED SITE ALLOCATIONS AND OMISSION SITES

- 3.1. Rugby Borough Council needs to consider where the most sustainable and deliverable locations are in the Borough to meet the identified housing needs to 2031. This part of the background paper considers the potential for the Borough to meet this need and the possible role of each different location typology within the Borough in meeting this need.

The recent strategy for distributing housing in Rugby Borough

- 3.2. Rugby Borough has a relatively straightforward settlement hierarchy. There is one principal urban area, Rugby, which is surrounded by a collection of villages of varying sizes. As a result, Rugby town has historically been the primary focus for growth within the Borough. Although there is a clear hierarchy of settlements within the Borough, it shares boundaries with several authority areas, some of which are urban boundaries, such as Coventry and Hinckley.
- 3.3. The Local Plan 2006 made provision for a maximum of 3,710 new dwellings between 2006 and 2016 which equated to 309 dwellings per annum. The strategy within that Plan was that 87% of the new housing provision would be made in Rugby, Long Lawford and Dunchurch. All of the sites allocated within the plan were within the urban area. Safeguarded housing sites were designated within Long Lawford, Wolston and Ryton on Dunsmore, but not allocated. The sites within Wolston and Ryton on Dunsmore were safeguarded with the specific intention of meeting the longer term needs of these communities, particularly given their relationship to Coventry, if this should prove necessary.
- 3.4. The Core Strategy was adopted in June 2011 and is the current development plan for the Borough. The Core Strategy plans for the provision of 10,800 dwellings between 2006 and 2026 at a rate of 540 dwellings per annum. It is specifically stated within the Core Strategy that at least 9,800 (approximately 90% of the total target) of that housing provision would be directed to Rugby town, as the most sustainable location in the Borough. This was to be achieved by the allocation of two strategic urban extensions to the town, Rugby Radio Station (Houlton) and Rugby Gateway (Eden Park). A collection of sites named the South West Broad Location were stated to be a further growth location should the allocated sites not deliver as anticipated.

Delivery of the Existing Strategy to date

- 3.5. Significant levels of growth to Rugby town have already been permitted in accordance with both the 2006 Local Plan and the Core Strategy. Most of this growth will take place at the urban extensions allocated within the Core Strategy, i.e. the Rugby Gateway (Eden Park) and Rugby Radio Station (Houlton), which total 7,500 houses. However, only 244 dwellings of the total 7,500 houses have been completed to date. As shown in the existing housing trajectory at appendix 2, only 4,513 dwellings will be completed by 2031 at these two urban extensions. Other deliverable sites within the committed supply, or subject to signed Section 106 agreements, will provide an additional 1,982¹⁴ dwellings. 8,938 of the 9,248 committed

¹⁴ Sites of 5 dwellings or more

dwellings will be built either within or immediately adjacent to the urban edge of Rugby town. Although it is not anticipated that all of these houses will be delivered within the plan period, it is clear that the Rugby urban area will continue to be the primary focus for growth within the Borough during the 2011-2031 plan period. Whilst this quantity of housing is permitted, the anticipated timing of its delivery is problematic, as referred to in the preceding sections of this background paper.

- 3.6. A lack of housing delivery has been a national problem during the recessionary period and this provides part of the explanation as to why the higher rates of delivery seen in 2006-2008 have not continued to the present day. However, the principle of the distribution strategy contained within the Core Strategy was the allocation of two strategic sites at Rugby Radio Station (Houlton) and the Gateway (Eden Park) and the larger of these, Rugby Radio Station has failed to commence delivery in the timeframes the Council has anticipated. Whilst other land has come into the housing supply during that period, such as Cawston Extension (600 dwellings) and Cawston Lane (250 dwellings) these have only recently commenced or received reserved matters approval, the timing coinciding with the potential lapse of their respective outline permissions.
- 3.7. More recently the Council has sought to ensure that sites granted permission as a result of the authority being unable to demonstrate a 5 year housing land supply are developed sooner than experienced at the sites discussed above. This has been achieved by requiring at outline approval that reserved matters applications must be gained within a specified period of time. An example of this is the Ridgeway Farm site, where reserved matters were required 18 months from approval and this target was met.
- 3.8. Further to this, the Council has been supportive of the early delivery of infrastructure at the Rugby Radio Station Site where the link road was granted Homes and Communities Agency funding in June 2016. This has brought forward delivery of the road to an anticipated completion of the end of 2018. This is much sooner than the trigger of 1,750 dwellings set in permission granted. The funding will enable the accelerated delivery of the site by opening up a new sales front in addition to the current phases of development.
- 3.9. The Rugby Radio Station site also has two dedicated Council planning officers overseeing the site reserved matters applications. Regular meetings are held with the landowner, Rugby BC and Warwickshire CC to ensure timely decisions are made to support the ongoing delivery of the site. It should be noted that whilst there have been delays at the site, a significant amount of infrastructure has been provided upfront. Consequently housebuilders will have fully serviced plots which will support a quicker build out rate at the site than normally expected at other sites within the Borough. The detail within the Section 106 structure for the entire site removes the risk of delivery being delayed by land ownership issues or delays in infrastructure. This again distinguishes the site from others on the edge of Rugby. Whilst the site has taken time to come forward, developers Davidsons are now building out their first parcel, with Crest Nicholson and Morris Homes also recently being granted reserved matters approval.

- 3.10. Unfortunately at developments that have commenced but stalled there is very little intervention at the Council's disposal to resolve the issues that arose. These have included land value disagreements between the developer and the landowner or market conditions impacting on delivery. Given that these sites benefit from planning permission, measures such as seeking self-build plots on sites to help boost supply cannot be implemented.
- 3.11. In 2014 the Council consulted upon a Development Strategy Paper. This paper highlighted the issues the Council had encountered in demonstrating the required five year supply of housing land. At that time, this issue was also exacerbated by evidence of higher levels of housing need contained within the 2013 JSHMA. The Council reported that it considered the settlement hierarchy contained within the Core Strategy was compliant with national planning policy and could continue to direct growth in the Borough; the Council continues to hold that view.
- 3.12. The Council therefore used the hierarchy contained within the Core Strategy when considering its options for further site allocation. The continuing role of the urban area as the focus for growth has been evaluated and this has informed consideration of the role of the rural area.

The Reasonable Options for meeting the housing target

- 3.13. The set of spatial options in Figure 9 below are considered to represent all reasonable alternative options for meeting the growth targets to be delivered through the emerging plan. Rugby Town is consistently listed as the main focus for growth for reasons already outlined. The variation in options is therefore about the role that the rural area should take in meeting strategic housing targets.

Figure 9 – Spatial Options

| Option | Distribution Detail |
|---|--|
| Option 1: Existing balance | Main focus is Rugby Town via infill development or urban extension; |
| | Main Rural Settlements (MRS) development occurs within existing settlement boundaries; Local Needs Settlements (LNS) are limited to development that meets an identified need only. |
| Option 2: Urban and Urban edge focus | Main focus is Rugby Town via infill development or urban extension; |
| | Where Rugby Town cannot accommodate all growth, additional development is focussed upon the edge of Coventry and Hinckley urban area; |
| | Some boundary alterations are made to MRS; LNS are limited to development that meets an identified need only. |
| Option 3: Wider Focus | Main focus is Rugby Town via infill development or urban extension; |
| | Some boundary alterations are made to MRS; |
| | LNS small scale infill development. |
| Option 4: Intensified Urban Focus | Main focus is Rugby Town via infill development or urban extension; |
| | MRS are limited to development that meets an identified need only; |
| | LNS development is restricted. |
| Option 5: New Town | Main focus is Rugby Town via infill development or urban extension; |
| | Where Rugby Town cannot accommodate all growth, additional development is focussed in a new MRS development located in the countryside; |
| | MRS accommodate small scale development within existing settlement boundaries; |
| | LNS accommodate small scale infill development. |

3.14. The following sections of this background paper outline the evidence available to the Council in considering each of the tiers within the settlement hierarchy and the role they can play in meeting the strategic growth target. Each tier is addressed in turn, starting with the urban area as the most sustainable location for growth in the Borough and main focus in each option. Tiers that exist within the rural area are then considered, in order of general sustainability.

RUGBY TOWN (URBAN AREA): THE PRIMARY FOCUS FOR GROWTH

Evidence Base

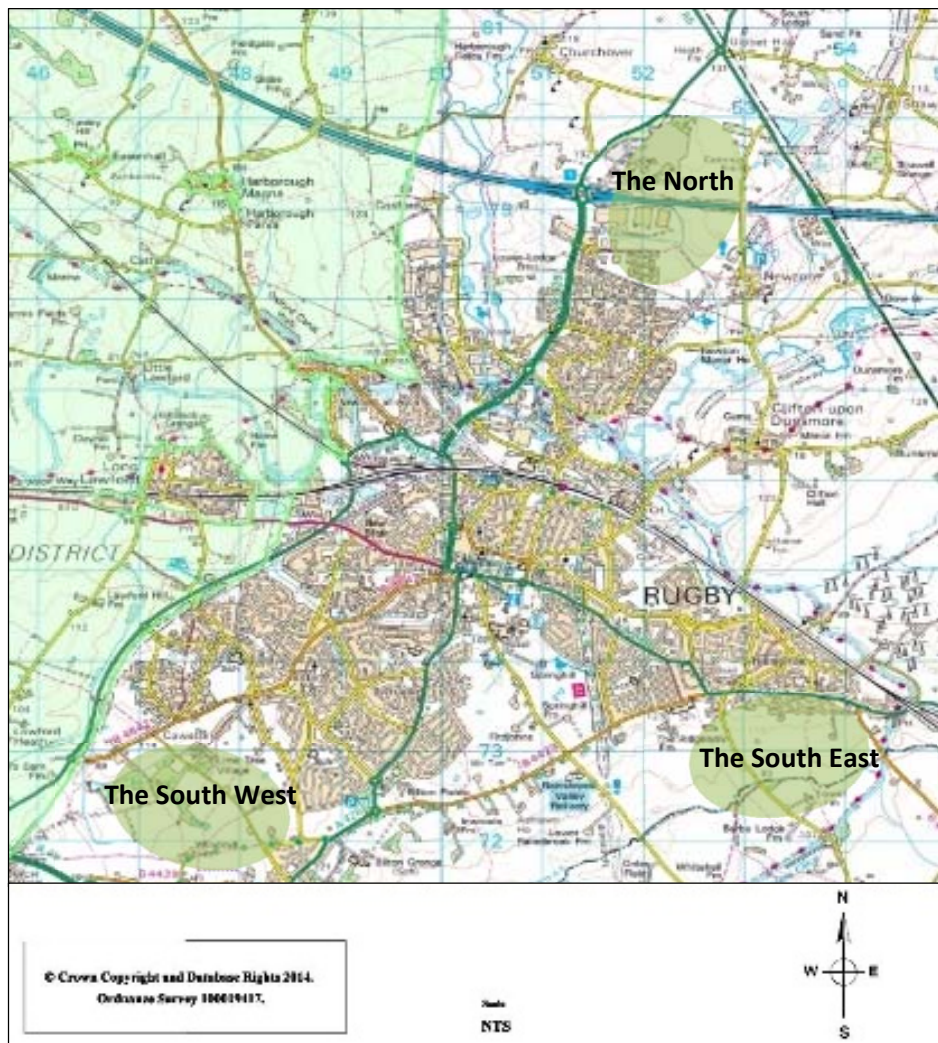
- 3.15. As stated in the opening paragraphs of this paper, Rugby town will remain the primary focus for growth within the Borough by virtue of the levels of development already permitted or forming existing development plan allocations within the urban area and immediately adjacent to it. Planning permission has been granted by the Council for over 8,938 dwellings in this area. The majority of the housing required to meet the objectively assessed housing need of the Borough has, theoretically, therefore been identified and approved. However, as has been detailed, the timing of housing delivery upon these permitted sites has not delivered the Council's annual housing targets and this quantity of housing is insufficient to meet the whole Local Plan housing target.
- 3.16. The SHLAA identified that there is capacity for further development within Rugby town itself (130 dwellings) (see Figure 10 below) but that this will not meet the shortfall against the housing target. However, the capacity for the urban area has actually reduced as detailed below. Sites S14/106/125/145/151 are all Council owned garage sites where a review of the suitability of the sites for housing is currently ongoing. Therefore the sites have not been allocated within the Plan as there is no firm commitment from the Council to develop the sites and should proposals come forward for the sites they would comply with the Local Plan settlement hierarchy.

Figure 10 – SHLAA Sites in Rugby Town

| Site Ref | Site Name | Area (ha) | Indicative Capacity | Updated Commentary |
|-----------------------|---|-----------|---------------------|--|
| S14/010 | Land to Rear of 84-90 Dunchurch Road, Rugby, Warwickshire, CV22 6DW | 0.21 | 5 | Site benefits from planning permission (R16/1625) for 9 dwellings granted 29/09/16 though it is not contained within the housing trajectory due to current deliverability issues |
| S14/106 | Market Quarter, Cattle Market, Railway Terrace, Rugby | 1.687 | 42 | Longstanding site which has been marketed with no developer found |
| S14/125 | Jackson Road | 0.316 | 8 | RBC Housing appraising the suitability of the site |
| S14/137 | Lawford Road/Addison Road, Rugby | 0.265 | 7 | Site has had recently utilised for public realm improvements |
| S14/145 | Perkins Grove garage site, Rugby | 0.236 | 6 | RBC Housing appraising the suitability of the site |
| S14/151 | Lever Road, Rugby | 1.898 | 48 | RBC Housing appraising the suitability of the site |
| S035 | Land adjacent to 15 Parkfield Road, Newbold on Avon | 0.49 | 14 | Site benefits from planning Planning (R14/2338) granted 08/05/2017 and contained within the housing trajectory |
| Total Capacity | | | 130 | |

- 3.17. On this basis, it is through the continued extension of Rugby town that its function as the primary focus for growth will be fulfilled.
- 3.18. Given the shortfall between the number of currently committed dwellings and the housing target, the Council sought to identify large scale urban extension options that will deliver sufficient quantities of housing but also be able to provide required levels of infrastructure. To this end at the Preferred Options stage, site options available on the urban edge of Rugby and outside the Green Belt were grouped into three broad locations. These are to the north, south east and south west of the town, as shown in Figure 11 below. The SHLAA contains information about these sites individually.

Figure 11 – Broad Locations adjacent to Rugby Town



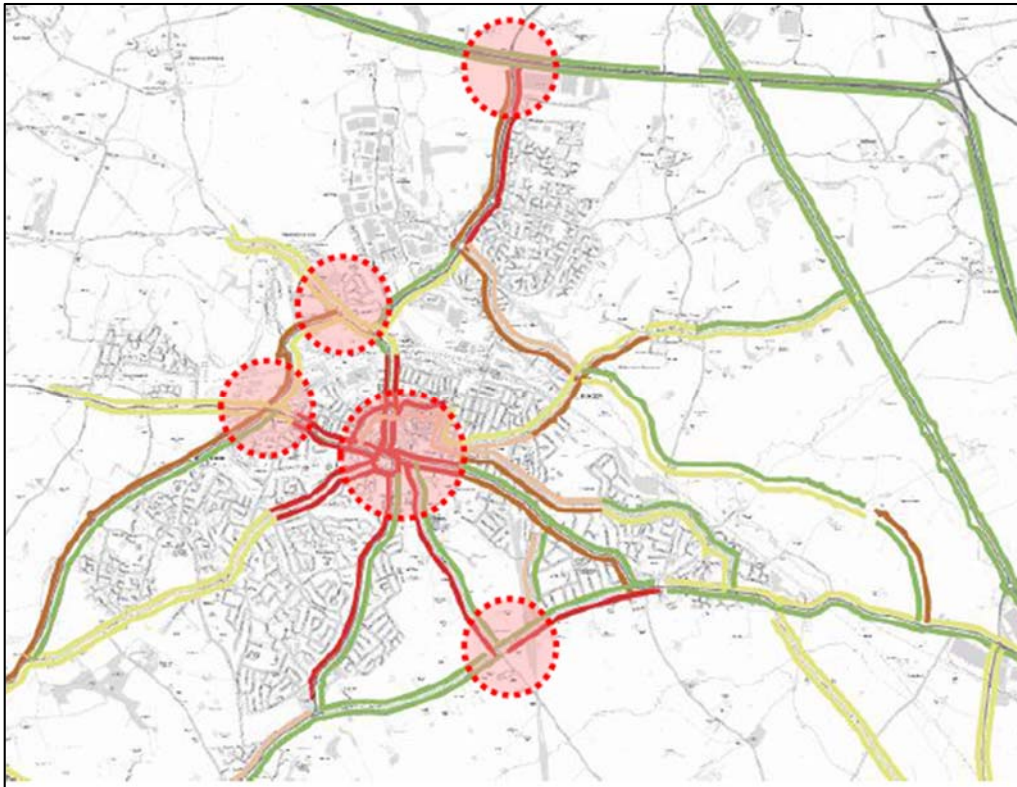
- 3.19. In assessing each site as a potential option, consideration must also be given to the anticipated timing of delivery on these sites, alongside those already committed and in particular whether they would enable the Council to be able to demonstrate a continuous five year supply of housing throughout the plan period. To inform these considerations the Council commissioned consultants GL Hearn to undertake a Housing Delivery Study. The purpose of the study was to develop a greater understanding about the rates of delivery that can be anticipated in the Borough and the strategies that would need to be employed if higher housing targets are to be put in place and met.
- 3.20. Warwickshire County Council (WCC) in 2015 were commissioned to provide initial evidence, based on the details of potential sites, about what capacity exists within the transport network across Rugby town to accommodate additional development alongside that which is already committed.
- 3.21. The combination of the transport and deliverability work helped to inform the Local Plan housing distribution strategy. Additional landscape sensitivity work was undertaken in 2017 which has reinforced the distribution strategy for the urban area as previously consulted upon during earlier stages of the Plan. The findings of this work are summarised below.

Rugby Transport Work 2015

- 3.22. To inform the Local Plan Preferred Options Warwickshire County Council (WCC) were engaged to consider, at a high level, what capacity exists within the transport network across Rugby town to accommodate additional development alongside that which is already committed. The transport work was undertaken in two phases. The first phase considered, at a high level, the impact of all of the Rugby Town urban edge SHLAA submission sites considered to be 'suitable' being delivered by 2031, alongside developments already committed.
- 3.23. This work was informed by the content of SHLAA submissions made in relation to urban edge sites. All potential urban edge sites were included in Phase 1 work¹⁵, regardless of the conclusions of the SHLAA which had not been completed at the time. This allowed for full testing of all potential urban edge sites i.e. it was a maximum scenario.
- 3.24. This utilised the transport modelling to identify specific impacts on the highway network within the town. These are identified in the plan shown below in Figure 12. The larger the circle, the greater the impact at that point on the network.

¹⁵ https://www.rugby.gov.uk/directory_record/5798/preferred_options_transport_evidence_2015_-_warwickshire_county_council/category/86/reviews_studies_and_assessments

Figure 12: Impact on journey time in Rugby from all 'suitable' Rugby town SHLAA submissions



- 3.25. It is clear from Figure 12, that these levels of development upon the urban edge would cause significant issues at the gyratory in the town centre. The gyratory is extremely tightly bounded and offers very little scope for mitigation to reduce the impacts that would be experienced. Similar to the gyratory, the Butlers Leap and Rugby Road junction show impacts where the mitigation options are unclear. Given their location at the centre of Rugby, WCC were of the view that all additional SUEs would create some impact on these key town centre infrastructure elements.
- 3.26. Other impacts identified through the modelling work are north of Rugby town centre, along the A426. Although there is potential for signalisation and roundabouts on the A426, there is clearly a significant impact. Journey times in west Rugby from the south west of Rugby to the M6 are also identified and would require mitigation from the sites promoted in the south west. In general the modelling found the impact on the network worse in the town in the AM peak than the PM peak.
- 3.27. The second phase of transport work¹⁶ tested the impacts of allocating housing in each of the broad locations, in order that the location with the lowest additional impact could be identified and, thus, brought forward sooner than the other areas. At this time, more detailed

¹⁶ https://www.rugby.gov.uk/directory_record/5798/preferred_options_transport_evidence_2015_-_warwickshire_county_council/category/86/reviews_studies_and_assessments

assumptions could be made about the sites to be assessed and the resulting quantum of housing. These assumptions did allow for initial testing of potential development scenarios.

- 3.28. The urban edge SHLAA submissions were considered in three broad locations: the north, south east and south west in order to understand the urban extension options for Rugby. A number of models were run utilising different development scenarios for the broad locations.

Overall Rugby town options transport assessment conclusions

- 3.29. In concluding the outputs of the modelling work, the following observations were made:
- The South-western model network performs best and the South-eastern network performs worst. The assessment therefore considers it reasonable to conclude a preference for delivery in transport impact terms of the South West option, then the Northern option, and lastly the South Eastern option on account of the fact that this option returns the highest increases in delay and the greatest number of increases in queues at key junctions.
 - The provision of a southern distributor link in part (shown in Figure 13 below), within the development allocation area, is considered essential for the south west and the south east options.

Figure 13 – Southern Distributor Link Road



- The high level analysis indicates that the level of housing that has been tested for the South-eastern (SE) allocation is likely to generate traffic levels which reach, and in some cases exceed, the network capacity even after mitigation measures. It concludes the option is only likely to be feasible in transport terms once the south-western allocation is built out, inclusive of the link road.
- The Northern scenario at the PM network performs better than the SE option whilst the AM network is the worst performing network. Potentially this problem may relate to the

conflict between traffic entering the study area to travel to work in Rugby Centre and traffic leaving Rugby along the A426 to travel to work via the M6.

Strategic Transport Assessment (STA) Modelling Analysis and Overview June 2017

- 3.30. The STA June 2017 was produced to provide an update to the STA 2016 which supported the Publication Local Plan. As per the STA 2016 the update identified that an area of constraint within the transport modelling is the Dunchurch crossroads which connects the A426 with the M45/A45 via the B4429 Coventry Road. This area is one which already suffers from severe queuing and experiences issues with air quality. The STA continues that interim proposals may have been identified which could provide some additional capacity at the junction but that, after these proposals have been delivered, options for enhancing the capacity of the junction via direct intervention are likely to have been exhausted. It continues to state that it is considered favourable to promote options which limit the amount of additional traffic which is likely to travel through the crossroads as the Local Plan is brought forward.
- 3.31. The above reiterates the finding of the Rugby Transport Work 2015 that development within the south east of Rugby urban area would only be feasible in transport terms once the south-western allocation is built out, inclusive of the link road. Without a south west link road the problems experienced at Dunchurch crossroads will be exacerbated as mitigations on the junction would have been exhausted. It must be noted that whilst the Rugby Transport Work 2015 tested a significant amount of development within the south east. The delivery of the south west link road which will provide a relief to Dunchurch will be required by 2026, as detailed within the proposed modification to Policy DS9 of the Plan, with the remaining part of the link road not being provided until 2031.

Rainsbrook Valley Landscape Sensitivity Study 2017

- 3.32. The SHLAA highlighted a number of sites on the south east fringe of the Rugby Urban Area were suitable despite being identified in an area of high landscape sensitivity, (informed by the Landscape Assessment of the Borough of Rugby 2006). The SHLAA stated that for these sites more detailed landscape assessments would be required.
- 3.33. Following refusal on landscape grounds for a residential development (Land at Barby Lane App Ref R15/2039) on the south east fringe of the urban area, identified as being of high sensitivity with the Landscape Assessment of Borough of Rugby 2006, the Council commissioned the Rainsbrook Valley Landscape Sensitivity Study. The aim of the study was to provide a more detailed assessment of the south east urban fringe and took account of developments that have occurred within the locality since the 2006 assessment.
- 3.34. The study was used to inform the subsequent planning appeal for the Land at Barby Lane site, and other subsequent planning applications within the locality. In terms of the planning appeal a decision (APP/E3715/W/16/3158785) was received on 5 July 2017 dismissing the appeal. The appeal decision at paragraph 19 stated that part of the site forms a component of a wider landscape (the escarpment) which has a high sensitivity to change and demonstrable physical

attributes. The paragraph continues that in the Inspector's judgement, the site or part of it is not within a valued landscape, contrary to the Rainsbrook Valley Landscape Study.

- 3.35. However, at paragraph 20 of the decision the Inspector stated that the escarpment is part of the intrinsic character of the countryside, having a different and more significant role in the wider landscape and a higher sensitivity than many areas of countryside on the edge of settlements. The Inspector concluded that the adverse impacts of granting planning permission arising from the substantial environmental harm to the landscape and limited harm from the loss of agricultural land and non-designated heritage assets would significantly and demonstrably outweigh the significant economic and social benefits resulting from the provision of new housing, including affordable homes, in an area where there is a shortfall in provision, and the moderate biodiversity benefits.
- 3.36. The Inspector's decision states: *"In reaching my overall conclusions I have had regard to that in allowing the appeal would weaken the Council's position in protecting the clearly defined southern fringe of the urban area and the escarpment from intrusive development. Whilst each application should be considered on its merits there is no doubt in my mind that permission here would make it more difficult for similar proposals to be resisted with a cumulative negative impact on the landscape"*.
- 3.37. Given the above, those SHLAA sites identified as suitable and available located within the escarpment are now considered to be unsuitable.
- 3.38. The Rainsbrook Valley Landscape Sensitivity Study 2017 also covered land contained within the proposed South West Rugby allocation as it falls within the same landscape area. The study concludes that the zones between Bilton and Dunchurch should also be safeguarded from development to avoid coalescence between the two settlements. As established through the STA June 2017 update, the alignment which runs through this area of land provides significant mitigation to the impacts at Dunchurch crossroads and therefore plays a crucial role in the delivery of the South West Rugby allocation. It is also worth noting that proposed policy DS8 makes specific requirement for the inclusion of a buffer to maintain the physical and visual separation of Rugby town and Dunchurch. The South West Rugby Masterplan SPD will detail the extent of the buffer.

Rugby Housing Delivery Study December 2015

- 3.39. The Council appointed consultants GL Hearn to undertake a Housing Delivery Study. This study focused on what level of housing provision could be delivered within the Borough during the 2011-2031 plan period, taking account of site and market-based factors.
- 3.40. The report considers the potential timing and pace of delivery of residential development at two levels – at a site specific level; and at a strategic level looking at Rugby Town and the Borough more widely.

- 3.41. In terms of the site specific level, the study assessed the Council's housing trajectory to ascertain whether assumptions on its timing of delivery and the rates were reasonable. The study recommended an alteration to the assumptions for the Rugby Radio Station site with the number of dwellings anticipated to be delivered being reduced. It should be noted that the landowners, Urban and Civic, consider that they are capable of delivering more dwellings than that recommended by the study.
- 3.42. Another key finding of the study highlighted that Rugby Town is a single market which contains a strong representation of large strategic sites but that these sites provide a comparative and competitive housing offer. The only difference between the large, edge-of-town sites is the quality of built product offered by each scheme, which varies by developer, therefore there is limited incentive for housebuilders who are already bringing forward schemes on the edge of Rugby to bring forward additional sites within Rugby Town and market both sites concurrently. The delivery of additional strategic urban extensions in Rugby town is, in effect, limited by the number of volume house builders already involved in schemes in the town. Of the sites that are committed, all of the Borough's large-scale residential development schemes are being, or are expected to be, developed by national/ regional housebuilders; the majority of the national housebuilders are expected to have sales points at these sites.
- 3.43. The housing delivery study therefore considered that continuing a strategy focusing growth on the urban area would not be unrealistic as the urban area and edge of urban area could achieve the same average rate of delivery as previously achieved through the Core Strategy and Local Plan. However, GL Hearn considers an anticipated maximum rate of delivery in the Rugby town market area of 470 – 520 dwellings per annum could realistically be achieved as most national housebuilders are already involved in existing schemes on the edge of Rugby Town. However, this means that further allocation of large strategic sites on the edge of Rugby Town, providing the scope to theoretically exceed this level of supply per annum, is unlikely to increase housing delivery rates. This approach would more likely provide a ready supply of sites to be brought forward later in the plan period, once the existing approved schemes are nearing completion.
- 3.44. To help address the Borough's land supply issue and to deliver a higher housing target than currently being planned would require broadening the range of developer organisations and spread of locations such as through enhanced delivery in smaller settlements, rural areas, and/ or on the edge of Coventry. GL Hearn conclude that there is potential for smaller housebuilders to contribute to boosting delivery in the short to medium term through the delivery of smaller schemes within the urban area or at smaller settlements. This could assist with early delivery and the achievement of a five year supply of supply.

Urban Area evidence conclusions and site selection

- 3.44. The transport modelling demonstrated that when directions of growth are considered, that there are directions which require less transport mitigation than others and as such are more deliverable in transport terms. In this instance the South East performs the worst and can only be delivered once the South West has come forward which will enable the southern relief

road, as shown in Figure 14 below, but this will not be fully in place until 2031. This means that the South East option is not deliverable in this Plan period.

- 3.45. The Strategic Transport Assessment (STA) was updated followed the Publication Draft consultation. The updated STA concluded that the revised spine road network which includes a connection to the Coventry Road, (B4429), provides the greatest mitigation. This is reflected in Figure 14 and 15 below. The STA concluded that figure 15 below shows the best performing option and therefore considered desirable for delivery. However, the STA was also clear in that the option shown in figure 14 below 'presents one of the best performing alignments in terms of the impact on the Dunchurch crossroads and at the Gyratory, along with the fact that this option requires the least amount of infrastructure, compared to each of the options. As such this strategic road alignment has been proposed as a modification to DS9.

Figure 14 - South West Link Road - Minimum SWLR Alignment

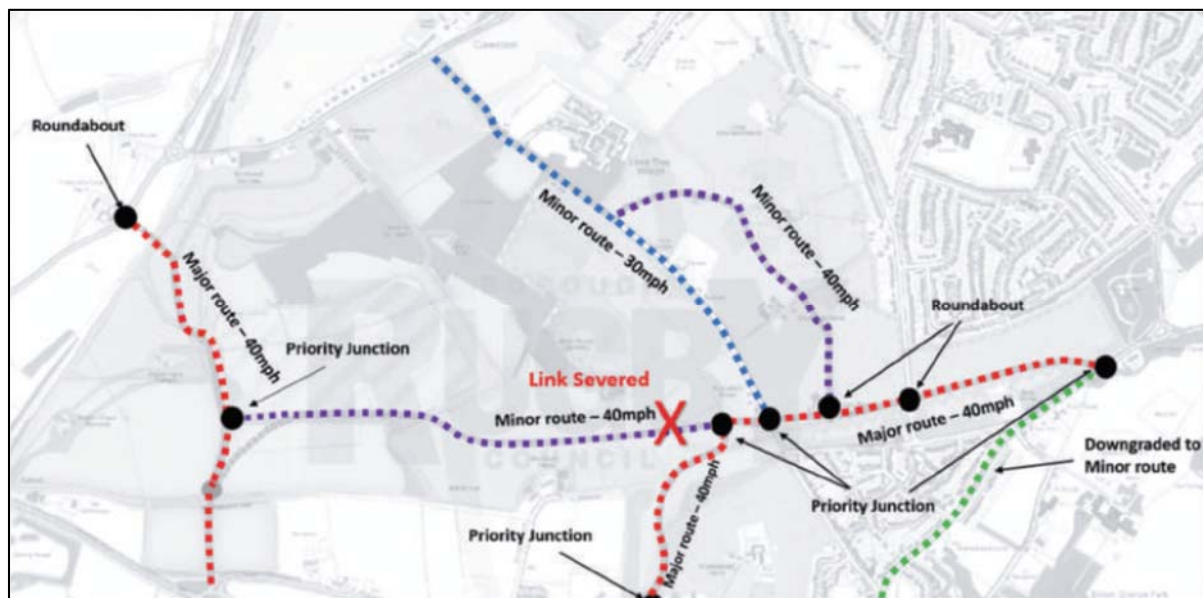
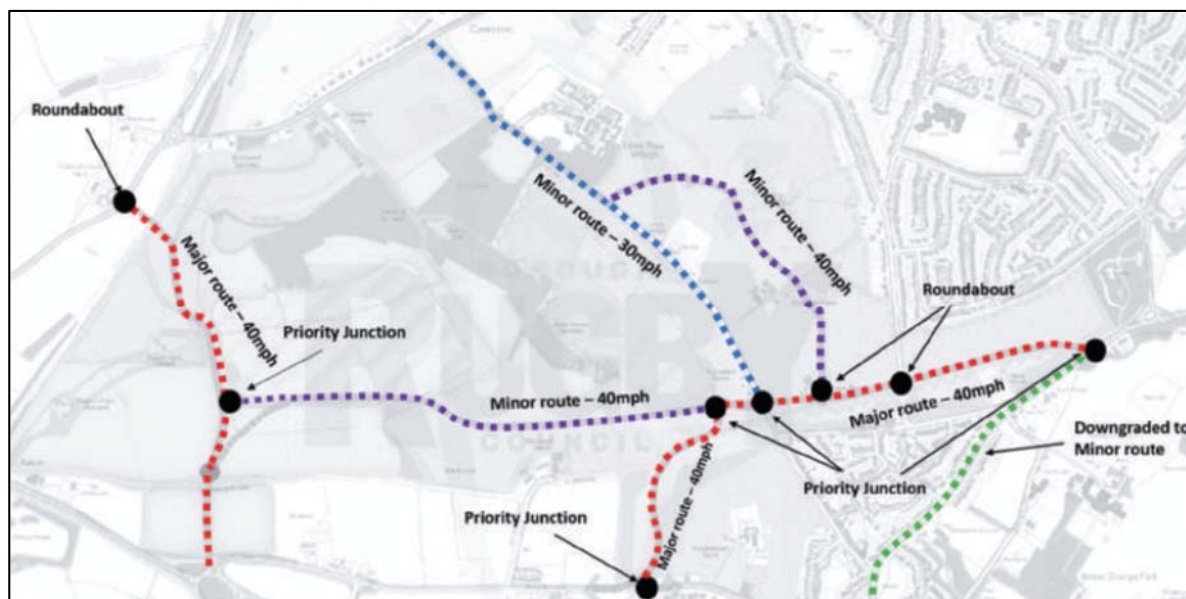


Figure 15 – South West Link Road - Optimum SWLR Alignment



- 3.46. Further to this, the sites being promoted within the south east area are within a high sensitivity landscape area, as detailed in the Rainsbrook Valley Landscape Sensitivity Study and confirmed within the Land at Barby appeal decision, resulting in the sites not being suitable. This removes 3,135 of the 9,117 dwellings identified within the SHLAA that are adjacent to the urban area.
- 3.47. The Local Plan proposes the allocation of the remaining urban edge sites identified within the SHLAA with the exception of two sites at the Hillmorton Lock totalling 80 dwellings and one site at Bilton Fields Farm for 17 dwellings. The larger of the two Hillmorton Locks site, which is for 70 dwellings, forms part of the open space provision for the Rugby Radio Station Site. The smaller site of 10 dwellings would impact on the Hillmorton Lock Conservation Area with the development effecting the open and green character of the area and views from the canal across the focal point of the Church tower.
- 3.48. With regard to the Bilton Fields Farm site, the site was submitted during the Publication Draft consultation. The site is in immediate proximity to the proposed South West Rugby allocation. As previously stated within this paper, the vast majority of the Local Plan growth is to Rugby town as it the most sustainable location in the Borough. However, as demonstrated it has been necessary to look beyond the urban area to ensure the annual housing target can be delivered, in particular in the early years of the plan adoption. This allows time for the larger urban extensions to commence post adoption of the plan. It is considered the allocation of this site will not assist in meeting the annual housing target as there is already significant allocation from both the adopted Core Strategy and the draft Local Plan to Rugby town. In addition given the size of the site it is not considered to be a reasonable alternative to the proposed urban extensions to Rugby town. As such it is not proposed for allocation in the Local Plan.
- 3.49. The remaining sites identified within the SHLAA capacity for the edge of urban area have been taken forward as proposed allocations in the Publication Local Plan. In making these allocations the Council

is seeking to ensure it maximises the potential for housing delivery on the urban edge of Rugby throughout the plan period. Details of the sites are provided in Figure 15 below.

Figure 15 – Edge of Rugby SHLAA Sites

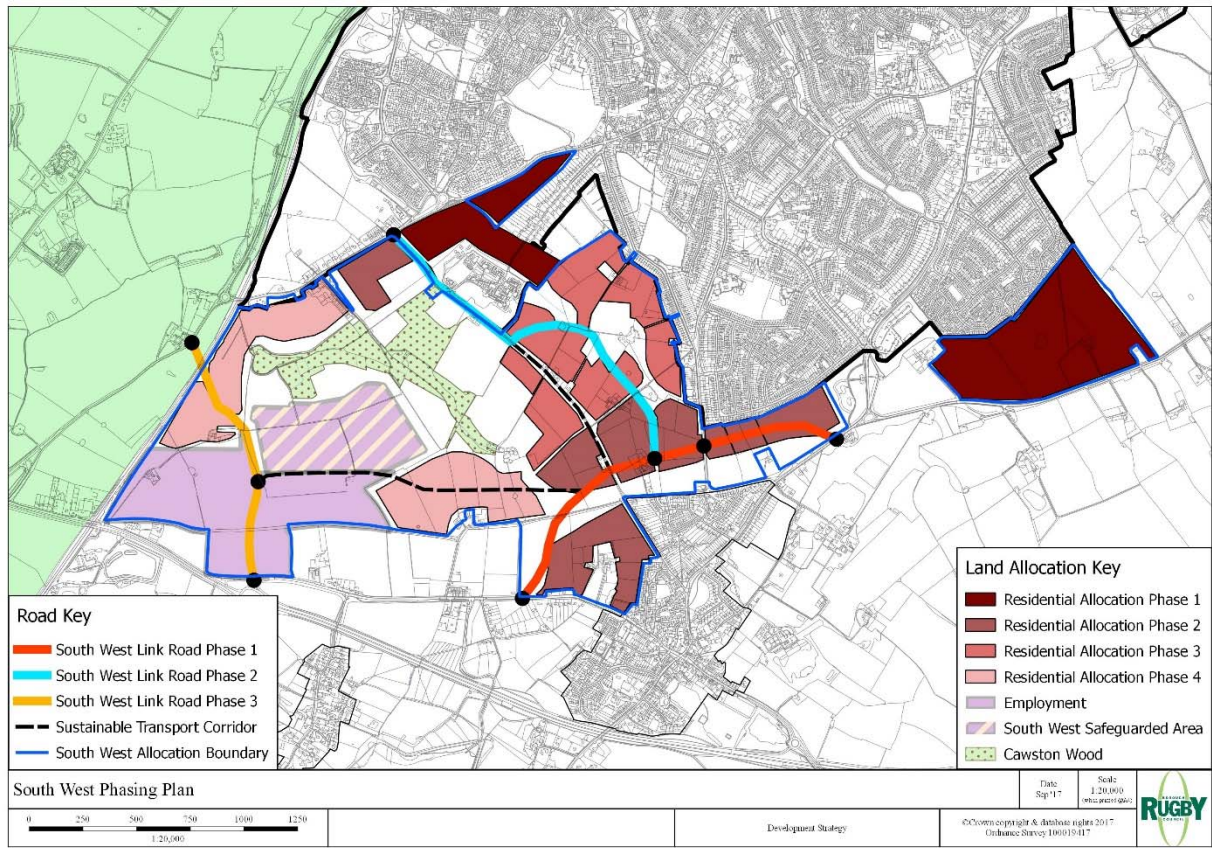
| Site Ref | Site Address | Area (ha) | Indicative Capacity |
|--|---|------------------|---------------------|
| SITES ALLOCATED | | | |
| S14/025 | Land at Ashlawn Road West, Ashlawn Road, Rugby, CV22 6HU | 38.34 | 900 |
| S14/102 | Land between Cawston Lane and Alwyn Road (Land within the South West Broad Location) | 86.75 | 1100 |
| S14/111 | Land to South of Cawston Spinney, Rugby | 115.5 | 1875 |
| S14/116 | Land at Main Street, Cawston | 5 | 150 |
| S14/117 | Dunkleys Farm, Cherry Tree Farm and Homestead Farm, Cawston Lane, Rugby | 67.16 | 775 |
| S14/034 (S16083) | Coton Park East, Rugby | 44.54 | 627 |
| S14/055 (S16083) | Coton Park East, Land to the north of Rugby to the east of the Coton Park development | 20.39 | 228 |
| S14/073 (S16014) | Land at Coton House, Rugby (small area) | 0.314 | 8 |
| S14/079 | Coton House, Lutterworth Road, Churchover, Rugby, Warwickshire | 12.19 | 222 |
| | | <i>Sub total</i> | <i>5885</i> |
| SITES NOT ALLOCATED WITHIN RUGBY SOUTH EAST | | | |
| S14/041 | Land at Florin Place, Hillmorton | 5.42 | 136 |
| S14/042 (S16032) | Land at Kilsby Lane, Hillmorton, Rugby, CV21 4PN | 10.42 | 261 |
| S14/046 (part S16062) | Waldins Farm, Barby Lane, Rugby, CV22 5QJ | 36 | 903 |
| S14/067 (S16035) | Land North of Kilsby Lane, Hillmorton | 5.29 | 133 |
| S14/098 | Moat Farm, Barby Lane, Rugby, Warwickshire | 27.86 | 699 |
| S14/134 | Moat Farm, Barby Lane, Rugby, Warwickshire, CV21 4HQ | 0.65 | 16 |
| S14/135 (S16033) | Moat Farm, Barby Lane, Rugby, Warwickshire, CV22 5QT | 15 | 376 |
| S14/143 | Rugby Riding Club, Land South of Ashlawn Road, Rugby | 22.752 | 571 |
| S16076 (S17005) | Land at Ridgeway Farm | 1.6 | 40 |
| | | <i>Sub total</i> | <i>3135</i> |
| OTHER SITES NOT ALLOCATED URBAN EDGE OF RUGBY | | | |
| S17001 | Bilton Fields Farm | 2 | 17 |
| S052 | Land at the Locks, Hillmorton | 2.8 | 70 |

| | | | |
|----------------|-------------------------------|------------------|--------------|
| S14/096 | Land at the Locks, Hillmorton | 0.41 | 10 |
| | | <i>Sub total</i> | <i>97</i> |
| | TOTAL | | 9,117 |

South West Rugby Allocation

- 3.50. Publication Draft Policy DS3.5 proposes the allocation of up to 5,000 dwellings at South West Rugby. It is anticipated that 3,715 dwellings will be delivered within the plan period. The South West Rugby Allocation comprises a number of parcels of land. Already 1,010 dwellings have full planning permission or planning permission subject to a signed S106, i.e. the Ashlawn Road site for 860 dwellings, Land South of Coventry Road and North of Lime Tree Avenues. As result, the South West Rugby allocation could contribute to housing delivery throughout the plan period.
- 3.51. The South West Rugby allocation will be delivered by a number of land owners working together to ensure the comprehensive development of the allocation. This is vital to ensure the delivery of the south west link road (as discussed above), which runs through the allocation as detailed in Publication Draft Policy DS9, to alleviate existing traffic issues and the related air quality exceedence already experienced at the Dunchurch crossroads. The delivery of the south west link road will also ensure that some pressure on the Gyrotory, which also suffers from traffic and pollution issues, will be alleviated through a link between the A45/M45 and A4071.
- 3.52. Delivery of the South West allocation will commence at the Bilton Fields, Ashlawn Road site. As part of the planning approval, highway improvements at the Dunchurch crossroads are required prior to commencement of the site. As the whole Bilton Fields site will not be delivered until 2029-31 this enables development to commence on parcels of land where the section of the south west Homestead link road, which bypasses Dunchurch (see Figure 16), will be delivered. Delivery of the Homestead link will be required prior to the improvement at Dunchurch crossroads junction if the capacity achieved by the Ashlawn Road approval is exceeded. Discussions with WCC Highways indicate that sites elsewhere in the South West allocation, such as those located on the Coventry Road (B4642), may also be able to come forward as the trips generated from this area may not have a direct impact on the Dunchurch crossroads. This is dependent on scale and supported by a transport assessment as part of any future planning applications. The section of the South West Rugby spine road to the west of the site known as Potford Dam/ Cawston Bends will be supported by the delivery of houses within the Cawston Spinney area of the site and the employment allocation at the South West Rugby site. The full delivery of the South West Rugby Spine Road will be funded through the development of the site which will continue to be built beyond the plan period.
- 3.53. The scale of the South West Rugby Allocation will ensure the effective and timely provision of infrastructure such as education facilities, GP provision and local/district centres. It will also ensure that a comprehensive Green Infrastructure network can be provided by protecting existing assets such as the ancient woodlands and enhancing the connectivity of assets through throughout the site. Publication Draft Policy DS8 proposes a Supplementary Planning Document which phases and masterplans the site.

Figure 16 – South West Allocation and South West Link Road



North Rugby - Coton House and Coton Park East Allocations

- 3.54. As demonstrated by the highway modelling work, development to the north of the town could come forward in a timely manner subject to appropriate highway mitigation. The allocation of land at Coton House and Coton Park East Extension will be a continuation of development within the area providing an opportunity for housing provision throughout the plan period at a relatively consistent rate. With the exception of Coton House’s heritage assets, which is explored further below, the two sites are located within the countryside and do not have any development constraints or infrastructure requirements which prevent the sites being developed within the first five years of the Local Plan following adoption.
- 3.55. Publication Draft Policy DS3.1 allocates the Coton House site for up to 100 dwellings. The site is located to the north of the Rugby urban area on the opposite side of the M6. However, the site is adjacent to existing residential development at the Coton House site. It is also well located to local services at Churchover and Coton Park (approximately 0.5 miles), education facilities, employment opportunities located on the other side of the M6, retail and leisure facilities on Leicester Road (A426) (approximately 2 miles) and the town centre (approximately 3 miles).
- 3.56. The site is located in or in close proximity to a number of heritage assets such as Coton House (Grade II* listed) and its curtilage, the stable block (grade II listed building), the Bowl Barrow (Scheduled Ancient Monument which has an ‘at risk’ status) and Coton House Park Estate Park and Gardens: a non-designated heritage asset in the form of a park and garden determined by Warwickshire County Council to be of architectural and/ or historic interest. On behalf of the Council, JS Conservation

Management & Town Planning Ltd assessed each of the four heritage assets in terms of their significance, overall value and contribution, and associated linkages which contribute to the significance of the Coton Park estate as one entity. The assessment found that the proposed development of the site would cause harm in a number of instances, which are a mix of substantial harm and less than substantial harm individually. The report concludes that as a result of the allocation, the entire context and interpretation of the Coton Park Estate would be lost. Overall the report concludes that residential development would not be appropriate as a result of the harm caused to the heritage assets and there being alternative suitable sites for development.

- 3.57. Historic England's (HE) representation to the Publication Draft stated "*harm should always be avoided in the first instance and only where this is not possible should mitigation be considered (NPPF Para 152). Any harm and mitigation proposals would need to be fully justified and evidenced to ensure they will be successful in reducing harm. In identifying whether harm could be avoided consideration should be had to more suitable alternative elsewhere in the Borough*".
- 3.58. Following consideration of the evidence and the representation by Historic England, it is considered that the site will make a valuable contribution to housing land supply at the point of adoption. There are no other alternative sites of the scale and location identified in the SHLAA that are considered to be suitable and deliverable as highlighted above. Subject to appropriate design including retention of key views and approaches, it is considered that harm can be mitigated. It is therefore concluded that the site is appropriate for allocation following consideration of the alternatives and the benefits that the site can provide in meeting housing needs within the plan period. As such the proposed allocation of land at Coton House remains.

Urban Area Conclusion

- 3.59. It is considered that the South West and North broad locations present sustainable development opportunities with appropriate infrastructure as set out the Infrastructure Delivery Plan. It is important, though, to also consider the extent to which these sites, alongside those already committed, could maximise the delivery potential of the urban edge and achieve the rate of delivery GL Hearn expect the town to be able to sustain throughout the plan period as set out in the Housing Delivery Study.
- 3.60. Since the production of the Housing Delivery Study the number of national and medium sized housebuilders operating in Rugby town has increased. Based on the updated housing trajectory (Appendix 1) there are 16 different sales outlets with housebuilders attached that are completing dwellings or are shortly due to commence development with completions by 2018. Some of the outlets are different arms of the same housebuilder or have multiple outlets running concurrently such as Bellway and Ashberry Homes (first presence in the Borough) at the Cawston Lane site and Bellway are also currently developing at the Former Warwickshire College site. Whilst Bovis Homes, Crest Nicholson, Davidsons, Linden Homes, Morris Homes and Orbit Homes did not have a presence in the Borough in 2015 now all have outlets. Based on correspondence with the housing developers, in total these outlets will deliver just over 620 dwellings per annum at their peak.

- 3.61. There are further housebuilders/outlets that are also seeking to commence development within Rugby town in the near future, such as Urban and Civic at the Houlton site; Persimmon Homes and Charles Church at the Coton Park East site; and David Wilson Homes and Barratt Homes at the Bilton Fields/ Ashlawn Road site. This means within the first five years of adoption there is the potential for 21 different outlets that will be attributed to a housebuilder. This is a significant increase in the number of outlets/ housebuilders from that were known to be operating within the Rugby urban area in 2015.
- 3.62. Should the market remain favourable and existing housebuilders move on to different sites within the urban area once they are nearing completion or have completed on their existing scheme, the number of outlets within the urban area to help sustain an ongoing five year land supply could be achieved. Given the number of outlets that are currently within the Rugby Urban Area, the peak of the anticipated urban area delivery rates in 2024/25 will require 23 outlets (based on approx 40 dpa per outlet). Whilst this is challenging it will be achievable as national/ regional housebuilders will have a continued supply of sites once the Local Plan is adopted. Consequently, the housing trajectory for the Local Plan anticipates a far greater number of outlets in the urban area than assumed by GL Hearn in the Housing Delivery Study. However, all these outlets will be in one housing market – Rugby Urban Area. To ensure that the higher housing target can be met there is a need to supplement the current strategic focus on Rugby town.
- 3.63. Figure 17 below indicates the impact these proposed allocations have upon the anticipated housing trajectory for the plan period. It is clear that these sites alongside existing commitments and an allowance for windfall sites, are sufficient to meet the housing target of 12,400. However, the urban edge allocations do not result in sufficient land coming forward to ensure a five year land supply at the point of adoption, as required by the NPPF. Moving forward the allocation of dwellings to ensure a land supply would not provide the Local Plan with flexibility should sites within the housing trajectory not deliver. There would also not be an adequate buffer should sites not deliver at the anticipated rates.
- 3.64. Given the level of development that is now anticipated to take place in and adjacent to Rugby Town during the plan period it is clear that Rugby Town will remain the principal focus for growth in the Borough throughout the plan period. The extent of development in the rural area is subject to consideration of the role of each level of the rural settlement hierarchy in delivering strategic growth. This is considered in the next section of this paper.

Figure 17: Housing Trajectory – Commitments and proposed urban edge allocations



3.65. Given the level of development that is now anticipated to take place in and adjacent to Rugby Town during the plan period it is clear that Rugby Town will remain the principal focus for growth in the Borough throughout the plan period. The extent of development in the rural area is subject to consideration of the role of each level of the rural settlement hierarchy in delivering strategic growth. This is considered in the next section of this paper.

THE RURAL AREA

- 3.66. As stated above, the timing of the delivery of housing in and adjacent to Rugby Town will not be capable of maintaining a five year land supply at the point of adoption. The Local Plan therefore allocates land in the rural area to ensure the housing target can be achieved, particularly in the first years, post adoption of the plan. The spatial options test a number of strategies for the rural area allocation, considering different roles for the different tiers of the settlement hierarchy (as detailed in Figure 9) and broad locations present within the rural area. Each of these is discussed in turn below.

MAIN RURAL SETTLEMENTS

Evidence

- 3.67. The Rural Sustainability Study¹⁷ provides an audit of the services and access to services in each of the Main Rural Settlements in the Borough. This work undertaken has informed conclusions about which villages in the Borough have sufficient services to be categorised as Main Rural Settlements.
- 3.68. Development in the Main Rural Settlements (MRS) presents several advantages. Firstly, these development sites offer variation to the supply of sites already available to the strategic urban extensions to the town of Rugby. As highlighted within the Housing Delivery Study, it is important that there is variation in the portfolio of land available for residential development.

Figure 18 –Rugby Borough Council Main Rural Settlements

| Main Rural Settlements |
|-------------------------------|
| Binley Woods |
| Brinklow |
| Clifton on Dunsmore |
| Dunchurch |
| Long Lawford |
| Ryton on Dunsmore |
| Stretton on Dunsmore |
| Wolston |
| Wolvey |

- 3.69. Development in the Main Rural Settlements (MRS) presents several advantages. Firstly, these development sites offer variation to the supply of sites already available to the strategic urban extensions to the town of Rugby. As highlighted within the Housing Delivery Study, it is important that there is variation in the portfolio of land available for residential development because: this increases the flexibility in supply; has the potential to attract smaller housebuilders who will not be present upon larger strategic sites; ensures that there is variation in the timescales over which sites can be delivered; and provides the consumer (i.e. the future resident) with choice about where they live.

¹⁷https://www.rugby.gov.uk/directory_record/5797/rural_sustainability_study_2015/category/86/reviews_studies_and_assessments

- 3.70. Not all MRSs offer this variation in the portfolio of land available for residential development. Clifton upon Dunsmore and Dunchurch are located very close to Rugby town and it is considered they share the same housing market as Rugby town. This is further reinforced by the significant levels of development that these MRS will experience through the life of the plan at the Rugby Radio Station (Houlton) Core Strategy allocation and at South West Rugby, which in itself is in close proximity to the settlement of Dunchurch. For these reasons, it is viewed that further development at these settlements will not offer a variation to the location of sites, either committed or proposed, upon the edge of Rugby town. It will also result in further outlets that are in close proximity to the urban area which is already at a challenging level to maintain. Although Long Lawford is relatively close to Rugby town it will not be in such close proximity to the level of growth allocated on the urban edge as Dunchurch and Clifton upon Dunsmore and an extension here will therefore contribute to the achievement of the housing target more effectively, in particular in the early part of the Local Plan adoption.
- 3.71. The expansion of MRSs also has advantages in relation to the sustainability of these settlements. The development of new housing in the rural area will contribute to meeting the housing needs of this section of the population, just as it would in the urban area. This is a clear advantage.
- 3.72. Alongside this, MRSs will benefit from infrastructure investment that may come with new development and the existing local services and community facilities that exist in the locations will also benefit from an increase in the size of population that is reliant upon them.
- 3.73. Currently there are a small number of committed housing schemes within the settlement boundaries of MRSs within the plan period. The trajectory in Appendix 2 indicates there will be delivery of approximately 160 dwellings from two sites: 48 dwellings within Dunchurch and 112 dwellings within Long Lawford.
- 3.74. The SHLAA demonstrates that there is only one other site capable of accommodating housing within the settlement boundary of a MRS, which is at Stretton on Dunsmore for 15 dwellings. However, there are heritage impacts and access considerations which mean that the number of dwellings that could feasibly be achieved would be less. Pre-application discussions regarding the site have indicated that the number of dwellings to be explored is closer to 5-6. Even at this lower figure there remains a concern about the development of garden land of Manor House which is a Grade II Listed Building situated within the conservation area. For this reason the site as detailed in the Stretton on Dunsmore Site Allocations Development Pack is not considered to be suitable for development.

Implications for the assessment of spatial options

- 3.75. The identification of a lack of land within Main Rural Settlement boundaries has implications for the spatial options the Council has considered as part of the development of the Local Plan. Whilst development within these boundaries would be preferable, it will not be sufficient to meet the shortfall of dwellings within the first five years of the Plan at the point of adoption. On this basis Option 1: Existing Balance and Option 4: Intensified Urban Focus (see Figure 9 above) must be dismissed and

only options that involve the alteration of boundaries to Main Rural Settlements can be considered realistic for this plan period.

Main Rural Settlement Boundaries

- 3.76. As there are no land options within the settlement boundaries of the MRS there would be a need to alter the settlement boundaries in order for MRS to fulfil a role in meeting the housing target. As each MRS (with the exception of Clifton Upon Dunsmore and Dunchurch) is located within the Green Belt this would require Green Belt release. The NPPF is clear that once established, Green Belt boundaries can only be altered in exceptional circumstances. The NPPF does not set out what the exceptional circumstances are for the release of Green Belt land. However, Paragraph 84 of the NPPF does emphasise the important of considering the need to promote sustainable patterns of development when reviewing Green Belt boundaries. Paragraph 1.37 of the Government’s recently published Housing White Paper – Fixing Our Broken Housing Market acknowledges that the exceptional circumstances are not set out in the NPPF and continues (Paragraph 1.38): *“we propose to amend and add to national policy to make clear that authorities should amend Green Belt boundaries only when they can demonstrate they have examined fully all other reasonable options for meeting their identified development requirements...”*. In the light of the NPPF and the Housing White Paper consideration has been given to the reasonable options for meeting the housing target. The reasonable options are set out in Figure 19 below.
- 3.77. Prior to releasing Green Belt sites through boundary changes to MRSs, consideration has also been given to the contribution Local Needs Settlements may play in meeting the housing target. The Borough has a number of smaller settlements, identified in the Core Strategy¹⁸ as Local Needs Settlements, located within open countryside. These settlements have not had a role in the strategic delivery of housing in previous Local Plans. Instead, development in these villages is only permitted where it meets an identified local need for housing only.

Figure 19 – Reasonable Options

| Reasonable options to be considered | Rugby Borough Council response |
|--|---|
| Making effective use of suitable brownfield sites and the opportunities offered by estate regeneration. | <p>The Local Plan has been informed by a SHLAA which has assessed the suitability and deliverability of brownfield sites, an assessment which is considered to be NPPF compliant and fully exhaustive in its identification and assessment of brownfield sites.</p> <p>At this point in time the Council’s ability to formulate viable estate regeneration schemes is inhibited by the lack of clarity of the government’s future rent setting regime. Without this the Council is unable to fully appraise opportunities in both financial and risk terms.</p> |

¹⁸ Core Strategy – Local Needs Settlements: Ansty, Barnacle, Birdingbury, Bourton on Dunsmore, Brandon, Broadwell, Burton Hastings, Church Lawford, Churchover, Easenhall, Flecknoe, Frankton, Grandborough, Harborough Magna, Leamington Hastings, Marton, Monks Kirby, Newton, Pailton, Princethorpe, Shilton, Stretton under Fosse, Thurlaston, Willey, Willoughby.

| | |
|--|---|
| <p>Consider the potential offered by land which is currently underused, including surplus public sector land where appropriate.</p> | <p>The SHLAA has considered the suitability and deliverability of all sites available as well as promoted for development. This has entailed an assessment of public sector land which in the main consists of farmland and garage sites. The Plan proposes to allocate sites that are within Warwickshire County Council ownership which forms part of the South West Rugby Allocation.</p> |
| <p>Optimising the proposed density of development.</p> | <p>The density of development proposed for the edge of urban area allocations has been benchmarked against recent planning permissions in a variety of locations. The density of allocations should also reflect the housing mix as identified within the SHMA in terms of the bedroom sizes. As none of the proposed allocations are within the town centre or by a transport hub it is difficult to increase the density of development as it will not reflect the character of the area and the requirement for on site infrastructure such as schools, local centre and open space provision.</p> |
| <p>Exploring whether other authorities can help to meet some of the identified development requirement.</p> | <p>The Local Plan is capable of accommodating the authority's own OAN. However, the unmet HMA need is derived from Coventry City Council, which also has Green Belt constraints. The HMA authorities (with the exception of Stratford) are all proposing Green Belt release to accommodate the full HMA need. It is also worth noting that some of the authorities within the Coventry and Warwickshire HMA are also within the Greater Birmingham HMA where there is an unmet need, despite Green Belt releases to accommodate need.</p> |

3.78. Prior to the consideration of releasing Green Belt sites through boundary changes to MRSs, consideration has also been given to the contribution of the Local Needs Settlements to meet the housing target. The Borough has a number of smaller settlements, identified in the Core Strategy¹⁹ as Local Needs Settlements, located within open countryside. These settlements have not had a role in the strategic delivery of housing in previous Local Plans. Instead, development in these villages is only permitted where it meets an identified local need for housing only. The availability of housing that meets the needs of rural communities has been a long standing concern of Rugby Borough Council as set out in the Core Strategy. The policy framework currently applicable in these settlements was intended to ensure that where sites were available within smaller villages, development would meet local need only. Housing Needs Surveys have been undertaken for these villages over a number of

¹⁹ Core Strategy – Local Needs Settlements: Ansty, Barnacle, Birdingbury, Bourton on Dunsmore, Brandon, Broadwell, Burton Hastings, Church Lawford, Churchover, Easenhall, Flecknoe, Frankton, Grandborough, Harborough Magna, Leamington Hastings, Marton, Monks Kirby, Newton, Pailton, Princethorpe, Shilton, Stretton under Fosse, Thurlaston, Willey, Willoughby.

years and consistently demonstrated the need for smaller units and affordable housing within the rural area.

- 3.79. However, historically, very little housing that meets these specific needs has been provided. This has been for a variety of reasons, the most significant being the impact of building local needs housing on the overall viability of the development. Frequently this relates to the conversion of existing buildings where the development costs can be greater than that for new build. In addition, applicants citing issues with conditions to be imposed on permissions which limit the future occupancy of the housing to identified local needs. This can result in lenders withdrawing funds. Such impacts result in developments not coming forward.
- 3.80. The Rural Sustainability Study has demonstrated that Local Needs Settlements do not contain the same levels of services available in MRSs. This lack of infrastructure is likely to become a constraint to development unless sites of a scale sufficient to invest in infrastructure and services are allocated.
- 3.81. Only two site submissions to the SHLAA are within the settlement boundary of a Local Needs Settlement and in total they only have capacity for 17 dwellings – 5 at Barnacle and 12 at Shilton. If any level of strategic growth were to take place it would require boundary alterations to the Local Needs Settlements and given the infrastructure constraints identified above, would have to be of a scale sufficient to provide infrastructure that would support a larger population.
- 3.82. This context led the Council to consider whether any sites adjoining Local Needs Settlements would be of sufficient size to enable additional services, resulting in the settlement being upgraded to the same status as a Main Rural Settlement, as detailed in Spatial Option 5 (see Figure 9 above). In the first instance, the Council has considered villages located in the open countryside, i.e. before considering villages alterations to the boundary of villages in the Green Belt. The largest site(s) submitted to the SHLAA adjacent to a Local Needs Settlement boundary was located at Churchover, with a combined capacity of 271 dwellings. The 2011 Census shows that at 2011 there were 113 households in the Parish so an increase of 271 dwellings would result in the number of households in the Parish increasing to 384 and it becoming the largest Local Needs Settlement (even when taking account of SHLAA edge of settlement sites at other Local Needs Settlements). This figure is still lower than the number of households at Brinklow in the 2011 Census of 492, the lowest number of households of any Main Rural Settlement.
- 3.83. Churchover scores very poorly in terms of the level of services available, as detailed in the Rural Sustainability Study. The amount of potential development is unlikely to be able to support the level of additional services required to either mitigate the impact of the expansion or to upgrade the settlement to a MRS.
- 3.84. It is, therefore, considered that there are no Local Needs Settlements located within the countryside that could be upgraded to a MRS. The potential for sites in non-Green Belt locations including, any deliverable brownfield sites, estate regeneration, under-utilised land, surplus public sector land and optimisation of housing densities have all been dismissed before the consideration of Green Belt locations. With this lack of supply of sustainable sites outside of the Green Belt, it is considered that the exceptional circumstances have been met to release land from the Green Belt through Main Rural

Settlement boundary alterations. Furthermore the extensions of MRS, most of which have had little or no development for some time, will provide support for services identified in the Rural Sustainability Study as well as housing in the locality.

Selection of Main Rural Settlement Allocations

- 3.85. The Local Plan Preferred Options proposed that seven of the Borough’s Main Rural Settlements (MRSs) would accommodate up to 100 dwellings each. The 100 dwellings for each of the settlements would help to diversify the market by providing a range of sizes and locations of sites within the Borough. This would also provide opportunities for smaller housebuilders (1 to 100 dwellings) to enter the market²⁰ where applicable. Discussions with site promoters indicate that such sites will be quicker to deliver with no large scale infrastructure requirements that could potentially slow down commencement. Therefore, allocations to MRSs would be capable of delivery within the first five year of the plan period post adoption making a vital contribution to the housing land supply position.
- 3.86. The sites proposed for allocation were not identified in the Preferred Options as it was considered that the Council would work in partnership with each of the MRS communities to identify the most appropriate sites for inclusion in the Publication Draft Plan.
- 3.87. A site allocations development pack was produced for each of the seven MRSs in June 2016 to inform the site selection process and to aid discussions with the relevant Parish Council. The document was sent to the Parish Council and a meeting held to discuss the content. It should be noted that addendum site allocation development packs have been produced for Binley Woods, Ryton on Dunsmore Wolston, Wolvey, Stretton on Dunsmore and Long Lawford. The addendums are as a result of discussions held with the Parish Councils and to reflect the content of completed studies such as Landscape Assessment Study and the Strategic Housing Land Availability Assessment (SHLAA).
- 3.88. The sites within the Main Rural Settlement Site Allocation Development Packs (June 2016) were identified from two sources: the SHLAA report (December 2015) and from the Call for Sites exercise which was held in parallel to the consultation on the Local Plan Preferred Options document (December 2015 – February 2016).
- 3.89. The sites contained within the June 2016 packs, in the view of Planning Officers, warranted consideration in order to ensure that sufficient regard has been had to all of the ‘reasonable alternative’ options, for site allocation.
- 3.90. The ‘reasonable alternatives’ were developed using the criteria set out in Figure 20 below.

Figure 20 – Reasonable Alternatives

| | |
|-----------------|--|
| Location | Sites are within, adjacent to or close to the existing settlement boundary of x enabling access to its services. |
|-----------------|--|

²⁰ As defined within the Savills “*Spotlight Residential Development 2015 – Who will build the homes we need?*”

| | |
|---|--|
| | Sites which are in isolated locations are not included. |
| Size | Sites need to be capable of accommodating 5 dwellings or more in accordance with SHLAA guidance. This ensures that there are not an unmanageable number of sites being included, impacting upon the delivery of houses. It also helps to prevent double counting of windfall sites (sites less than five dwellings, not allocated within the Local Plan). |
| SHLAA 2015 and Preliminary assessment of 2016 call for sites | Sites that have been assessed as suitable, available and achievable or suitable if policy changes are included. |

3.91. In assessing the sites the following factors were considered: the capability of a site being deliverable within the first five years of the Plan at the point of adoption; any local policy designations that could be overcome; constraints (such as historic environment, flood zone, agricultural land classification and biodiversity assets); Green Belt and landscape character; proximity to services; highways and site access; and site layouts (where provided). In considering the above factors a conclusion was reached for each of the sites as to whether it should be considered for allocation or not.

3.92. The outcome of the process resulted in the MRS allocations contained within Policy DS3 of the Local Plan Publication Draft as set out in Figure 21 below.

Figure 21: Extract of Policy DS3 Publication Draft Local Plan Policy

| Main Rural Settlement Allocations | | Number of Dwellings (up to) |
|---|---|------------------------------------|
| DS3.6 | Land at Sherwood Farm, Binley Woods | 62 |
| DS3.7 | Land off Lutterworth Road, Brinklow | 100 |
| DS3.8 | Land North of Coventry Road, Long Lawford | 100 |
| DS3.9 | Leamington Road, Ryton on Dunsmore** | 75 |
| DS3.10 | The Old Orchard, Plott Lane, Stretton on Dunsmore | 25 |
| DS3.11 | Land Off Squires Road, Stretton on Dunsmore 2 | 50 |
| DS3.12 | Linden Tree Bungalow, Wolston Lane, Wolston | 15 |
| DS3.13 | Land at Coventry Road, Wolvey | 15 |
| DS3.14 | Wolvey Campus, Leicester Road, Wolvey | 85 |
| ** Implementation of site allocation DS3.9 can only occur when adequate replacement of pitch provision is made to the satisfaction of Rugby Borough Council and Sport England in accordance with national planning policy. | | |

3.93. As highlighted within Policy DS3 of the Publication Draft Local Plan, the delivery of land at Leamington Road, Ryton on Dunsmore is reliant on the current occupiers Coventry City Football Club finding a

suitable replacement to the satisfaction of Sport England. The Football Club have had positive discussions about the relocation of the training ground to enable the delivery of the allocated site within the first five years of the Plan.

- 3.94. It should be noted that for the settlements of Binley Wood, Ryton on Dunsmore, Stretton on Dunsmore and Wolston the Preferred Option of up to 100 dwellings for each of these settlements has not been achieved. The reasoning for this is explained in the table below in Figure 22.

Figure 22 – Reasons for not achieving the Preferred Option up to 100 dwellings by Settlement

| |
|--|
| Binley Woods |
| Lack of sites at Binley Woods that are considered to be suitable and deliverable sites as demonstrated in the Binley Woods Site Allocations Development Pack |
| Ryton on Dunsmore |
| <p>The Ryton on Dunsmore Site Allocations Development Pack identifies Land at Lakeview Road (capacity 74-85 dwellings) as being suitable for development. The Local Plan Publication Draft Sustainability Appraisal assessment of reasonable alternative sites does not display any differences in scoring between the allocated site DS3.9 and the sites that make up Land at Lakeview Road.</p> <p>However, the factors that influenced the site selection process were site access and landscape character.</p> <p>In terms of site access a minimum 90m visibility splay would be required from the junction of the new access road with Leamington Road. This would require a bus stop to be relocated to overcome safety concerns that would be created by stopped buses restricting the visibility of vehicles exiting the access road and for conflict between vehicles exiting the access road and vehicles on Leamington Road overtaking stopped buses. WCC Transport Operations have advised that they are happy for the bus stop to be moved, with the preferred alternative location being the lay-by immediately to the west of the current location.</p> <p>Given current vehicle flows any on street parking caused by the removal of the parking bays could create traffic flow issues at peak periods. Concerns were also raised by the Parish Council about speeding in the vicinity of the site access. WCC Highways have advised that traffic flow data collected outside 44 Leamington Road suggests relatively good speed limit compliance, however Warwickshire Police regularly conduct mobile speed enforcement from this lay-by and this may have slowed traffic.</p> <p>In comparison the site access for allocated site DS3.9 would have fewer potential interruptions to visibility at this location compared to the Leamington Road site. The highways impact on Leamington Road is therefore considered to be greater for the land at Lakeview Road than that of the allocated site DS3.9.</p> <p>In terms of the landscape character the Landscape Sensitivity Study 2016 identifies that Land at Lakeview Road site has two different landscape sensitivity scorings. Parcel S16/008 is deemed to be of medium sensitivity and parcel S16/009 is of high/medium sensitivity. The Landscape Study indicated the site could accommodate some development provided that a landscape buffer is included within the scheme in order that a rural corridor along the PRow is maintained.</p> |

In comparison the Landscape Study identifies that Site DS3.9 is of medium sensitivity and the neighbouring land (Sport Connexions) is also of medium sensitivity. It is therefore considered that Land at Lakeview Road would have a greater landscape impact than that of site DS3.9. Further to this the site would significantly exceed the housing Local Plan Preferred Option target of up to 100 dwellings.

Representations received from Pegasus Planning Group on behalf of Mr Drakesford during the Publication consultation period highlighted that a smaller parcel of the site could be developed. The smaller parcel of land is identified within the landscape sensitivity work as being of medium sensitivity scoring and capable of accommodating up to 24 dwellings. Access to the site would be gained through the proposed allocated site DS3.9 as discussed with the land agent for the site. However, as proposed their remains deliverability concerns as the access to Lake View Farm will require land not within the same ownership and no formal agreement has been agreed.

Stretton on Dunsmore

The Stretton on Dunsmore Site Allocations Development Pack identifies site S16/100 2A Fosse Way with capacity for 5 dwellings as being suitable for allocation. However, due to site access and the character of the area it is considered that the number of dwellings would actually be less than 5 so the allocation would not be strategic and not for allocation.

Wolston

The Wolston Site Allocations Development Pack identifies site S16067 Land north of Wolston Lane (capacity 80 dwellings) as being suitable for development. However, the site is adjacent to a later phase of a minerals extraction site and the extraction programme indicates that the mineral development would not be completed until 2026. The site therefore is not considered suitable at this time due to the adverse environmental impact of the final stage of the minerals development being the filling of the void with inert waste. It is therefore viewed that as the site is not capable of being deliverable within the first five years of the Plan's adoption and the Council would be capable of demonstrating a land supply throughout the plan period there would not be exceptional circumstances to release the site from the Green Belt.

It should also be noted that WCC Education raised concern about increasing housing in Wolston due to the ability for Wolston St Magarets School to accommodate further pupils due to the site being constrained.

- 3.95. The Main Rural Settlement Site Allocations Development Pack for Wolvey identifies two further sites that were considered to be suitable for allocation. However, proposed allocation of those sites would result in the 100 dwellings limit being exceeded. The details as to why the sites were not selected instead of DS3.13 and DS3.14 are set out in Figure 23 below.

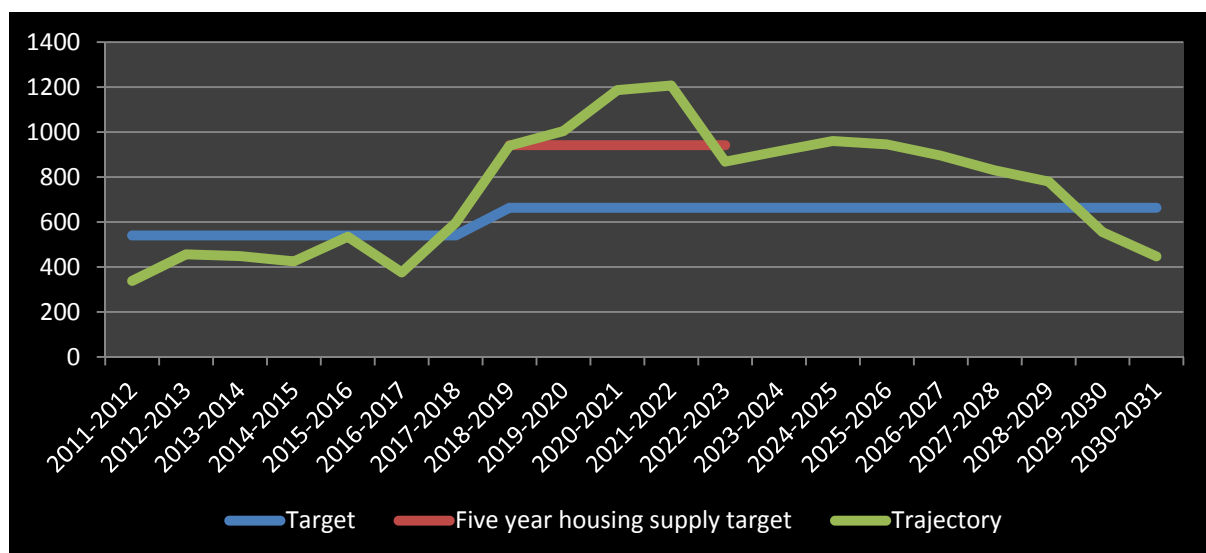
Figure 23 - Reasons for not selecting further sites at Wolvey

| |
|---|
| <p>Site S14/033: Land to the rear of Wolds Lane (Capacity 5 dwellings)</p> <p>Due to the site access, residential amenity and the character of the area it is viewed that the number of dwellings achievable would be less than 5 (capacity based on density used in the SHLAA). Thus the allocation of the site is not deemed strategic. The Landscape Sensitivity Study also identifies the site as being of high/ medium sensitivity whilst the allocated sites are of medium sensitivity.</p> |
| <p>Site S16/064: Land west of Coventry Road (Capacity 50 dwellings)</p> <p>The Landscape Sensitivity Study identified that a smaller parcel of the site could accommodate some development to the eastern part of the site. However, the development of the site would exceed the quantum of dwellings required for the settlement with the allocation of Wolvey Campus (DS3.14) which would result in the redevelopment of an existing brownfield site within the Green Belt and Land at Coventry Road (DS3.13) which is relatively enclosed and detached from the wider agricultural land.</p> |

Main Rural Settlement allocations conclusion

3.96. The impact of these allocations to the housing trajectory can be seen at Appendix 1 and in Figure 24 chart below. Inclusion of some village sites increases supply in the first five years post adoption, securing a five year land supply in the short term and providing a buffer of 507 dwellings ensuring a 5.54 years of supply. The Main Rural Settlement allocations are in sustainable locations and help to diversify the portfolio of sites in terms of size and location. It also enables a buffer should the delivery of the South West Link Road be delayed which would subsequently impact on the delivery rates of the urban area.

Figure 24 – Implications of inclusion of Main Rural Settlement allocations



3.97. The Local Plan Publication Draft proposes a change to the role that Local Needs Settlements perform where development within the settlement boundaries is acceptable without the need to demonstrate

a local housing need. The current policy regime (as set out in the Core Strategy) applicable to these settlements has proved to be too restrictive and resulted in no development of this nature being delivered. Land that is available within Local Needs Settlements is therefore not being put into use and housing proposals that might be achievable are not coming forward. The Council considers that in the wider context of the overall housing need of the Borough and the overall sustainability of rural populations in Local Needs Settlements the existing policy approach must be changed.

- 3.98. To reflect this change the Publication Draft Local Plan renames Local Needs Settlements as Rural Villages. This change enables small scale developments (non-strategic) to be built within these villages which cannot currently come forward without the need to demonstrate a local need. This change will provide another source of dwellings, albeit small, that could contribute to the mix of sites and location to support the supply of housing. No Green Belt boundary alterations will be required.

Rural Settlements: Implications for the assessment of spatial options

- 3.99. The approach outlined above for the Rural Area is consistent with Spatial Option 3: Wider Focus (see Figure 9 above) with the primary focus being Rugby urban area with more minor boundary alterations at the Main Rural Settlements and small scale development in smaller settlements.

New Main Rural Settlement

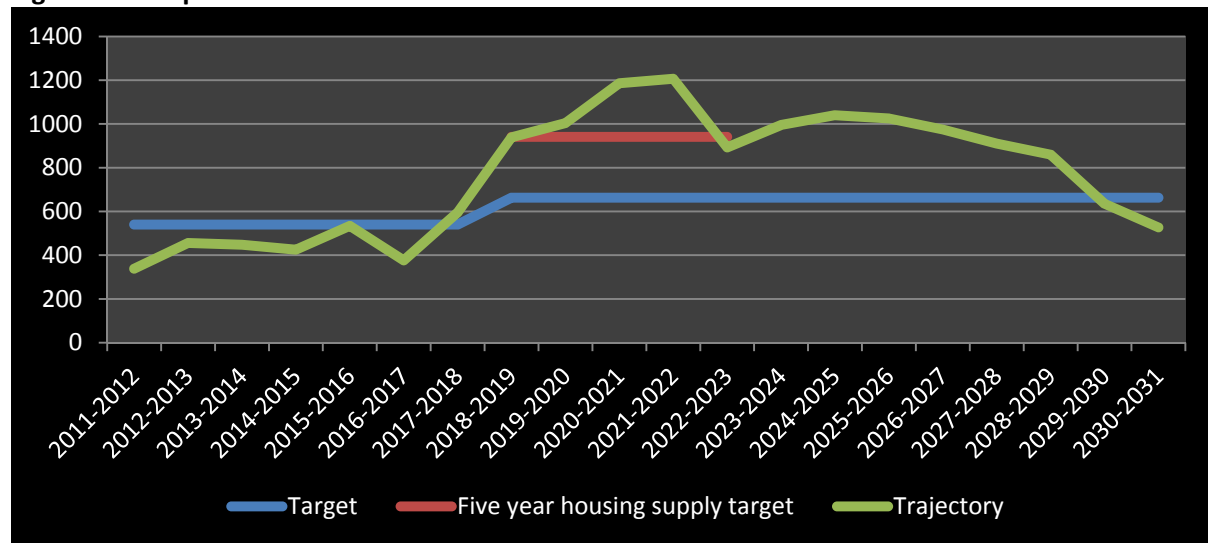
- 3.100. As demonstrated above the Council would be capable of demonstrating a five year land supply at the point of adoption and there will be 15,369 dwellings delivered within the plan period. However, beyond the first five years of the plan adoption the focus for delivery will be the Rugby urban area where it is anticipated there will be 21 outlets operating, 11 of which at the South West Rugby Allocation and 6 at the Rugby Radio Station site.
- 3.101. The Housing Market Delivery Report at paragraph 7.17 highlights that the Council should consider the “balance” of sites in the borough, and to maximise delivery consider growth locations away from Rugby Town. The Local Plan therefore proposes the allocation of a new Main Rural Settlement to ensure that there is an additional market for housebuilders thus providing a different market to the urban area. This affords greater certainty of continued ability to demonstrate a housing land supply position throughout the plan period.

Coventry and Hinckley urban edge

- 3.102. The Preferred Options consultation in 2015 proposed land at Walsgrave as a new settlement for 1,500 homes. Walsgrave is in close proximity to the Coventry urban edge. The Housing Delivery Study identified that the Coventry urban edge presented an opportunity to provide further development in a sustainable location, tapping into a housing market separate to that at Rugby town and therefore increasing the quantity of housing that is delivered across the Borough as a whole. This allocation would require Green Belt release. Land can only be removed from the Green Belt in exceptional circumstances. At the time of the Preferred Options consultation the proposal was justified in order to meet the local plan housing target given the lack of alternative sites outside of the Green Belt to deliver the strategic allocation of a new settlement.

- 3.103. The Walsgrave site is not included in the Publication Draft Local Plan as issues that were identified following the Preferred Options remain. Since the Preferred Options consultation, the deliverability of Walsgrave within the plan period has become more uncertain. Highways England can provide no certainty on timescales for the necessary enabling works to the A46 in their work programme. In addition the extent of the potential impact on the adjacent Coombe Abbey both in the respect of the historic and nature designations that it benefits from remain uncertain.
- 3.104. Communication received from the promoters of Walsgrave, Roxhill, in April 2017 proposed a mixed use development of 1,500 homes and up to 2,000 jobs through delivery of a 2 million sqft logistics park. It is estimated that this would be around 61ha of employment land. The site promoter is of the view that inclusion of employment land is necessary to undertake the A46 work to enable the site. The Local Plan Preferred Options consultation did not include any element of employment at Walsgrave.
- 3.105. The NPPF requires that Local Plans align their housing and employment targets and this will be tested at Examination. If the Local Plan were to include the extent of employment proposed by Roxhill, then additional housing allocations would be required and the Local Plan housing target would need to increase.
- 3.106. A call for sites exercise was held at the same time as the Preferred Options consultation to ensure all options for growth allocation were considered before progressing the Local Plan. Land at Lodge Farm was promoted through this process. The site is in a countryside location with direct access onto the A45. It has no on site constraints or any in close proximity which could either prevent or constrain the site coming forward. The emergence of a developable and deliverable non-Green Belt site meant the test of exceptional circumstances required for the Green Belt release of the Walsgrave proposal could no longer be justified. Walsgrave was subsequently removed from the Publication Local Plan. Furthermore, although Rugby Borough Council is delivering 2,800 homes of unmet need from Coventry, it is not identified as a separate target to Rugby's housing need. National planning guidance does not prescribe that this unmet need is located adjacent to Coventry.
- 3.107. Appendix 3 provides more detail on the consideration of Walsgrave following the Preferred Options consultation and of the decision to propose the allocation of Lodge Farm site as a new Main Rural Settlement.

Figure 25 – Implications of inclusion of new Main Rural Settlement allocation



3.108. The impact of the new Main Rural Settlement to the housing trajectory can be seen at Appendix 1 and in Figure 25 above. During the first five years post adoption the extensions to Main Rural Settlements will have largely built out, returning the focus of development back to the Rugby Urban Area. The inclusion of Lodge Farm replaces the alternative housing market to the Ruby urban area, continuing to offer a rural housing market. The Housing Trajectory shows a total of 15,369 will be delivered within the plan period against the target of 12,800, affording a sufficient buffer in which to maintain a continuous housing five year land supply throughout the plan period.

Implications for the assessment of spatial options

3.109. As outlined above, when this evidence is considered against the spatial options it becomes apparent that it is not possible to choose one of the options, as defined. Instead, an amalgamation of Spatial Option two (urban and urban edge focus) and Spatial Option five (new village) is arrived.

3.110. The Sustainability Appraisal concludes that in the majority of instances mostly positive or neutral impacts are identified against the Sustainability Appraisal Framework. Potential negative landscape impacts were identified. Additional landscape evidence was produced in 2016 to inform the Submission Local Plan to understand landscape impacts and to inform appropriate mitigation at the local plan level.

3.111. A summary of the assessment of spatial options is included as Appendix 3 to this background paper.

4. CONCLUSION

- 4.1 The draft Local Plan sets a gross housing target of 12,400 dwellings between 2011 and 2031. This is formed of the OAN for Rugby Borough and of unmet housing need from Coventry City, as agreed through the Memorandum of Understanding, to ensure the housing needs of the HMA are met in full.
- 4.2 This paper explains how the housing target will be achieved over the plan period through the delivery of a phased trajectory, as outlined in Figure 26 below. Phase 1 of the plan is the current Core Strategy target of 540 per annum. Although lower than the local plan target, it is higher than Rugby's OAN of 480, so contributes toward some of Coventry's unmet housing need. Phase 2 of the plan period therefore takes a step up in annual delivery to meet the remainder of the housing target.

Figure 26 - Phased Housing Trajectory

| Phase | Plan Period | Target Per annum | Cumulative requirement |
|-------|-----------------|------------------|------------------------|
| 1 | 2011/12-2017/18 | 540 | 3,780 |
| 2 | 2018/19-2030/31 | 663 | 8,620 |
| | | Total | 12,400 |

- 4.3 To achieve the increased housing target and boost the supply of housing, the existing Core Strategy distribution strategy was revisited. As detailed in this paper the most recent monitoring years demonstrate that the Rugby urban area focused distribution as identified in the Core Strategy has not been able to maintain a five year housing land supply.
- 4.4 In consideration of this, and the analysis of capacity and constraints of the Rugby Urban Area to accommodate more growth made, it is clear that other tiers of the settlement hierarchy must bring forward growth within the Plan period.
- 4.5 Allocating growth at other tiers in the settlement hierarchy will open up new housing markets within the borough to help ensure the increased housing target is met and that the Council can maintain a continuous housing land supply as required by the NPPF. This report details the evidence and processes undertaken to identify the most sustainable and deliverable locations, and sites to do this. In the case of Main Rural Settlements this has meant removing land from the Green Belt, requiring demonstration of exceptional circumstances. These extensions will not require significant infrastructure and will therefore come forward quickly, in the first part of the plan period. The new Main Rural Settlement will continue to provide delivery of housing in the rural area alongside the growth at the Rugby urban area.
- 4.6 The resulting Distribution Strategy, as detailed below, seeks to realise the opportunities each level of the hierarchy can offer both in terms of sustainable development, and ensuring the most deliverable strategy to meeting the housing target in the Local Plan. The new Main Rural Settlement and extensions to existing Main Rural Settlements provide a new market for housing delivery within the Borough, supporting the growth at the Rugby urban area.
- 4.7 Although the rural allocations will contribute towards the housing target, the focus of growth for the emerging Local Plan remains on the Rugby urban area. The existing allocations of Eden Park and Houlton will contribute significantly towards the Local Plan target alongside the proposed South West Rugby allocation, which will also bring further housing and employment growth to the Rugby urban area as the largest settlement in the Borough.

Figure 27 - Distribution Strategy

| Location | Distribution |
|----------------------------------|---|
| Rugby Urban Edge | Main focus for growth through urban extensions & infill |
| Main Rural Settlements | Boundary alteration to accommodate some housing growth |
| New Main Rural Settlement | A new settlement located in the countryside which will be the largest Main Rural Settlement within the Borough. |
| Rural Settlements | Boundary alteration, if supported by the Neighbourhood Planning Process. |
| Countryside | All new development will be restricted to preserve the existing character and resources. |

4.8 The Council is confident that the distribution strategy proposed represents the most sustainable of the policy options available and consistent with the provisions of the NPPF, when considering how the housing target can be met. It is a strategy that identifies sufficient land to ensure that the housing target is met and also afford an appropriate buffer to ensure the Council will be to maintain a continuous housing land supply throughout the plan period.

Conclusion of the Assessment of Spatial Options

- 4.9 In addition to the assessment referred to in this document, the Sustainability Appraisal (SA) assessed each of the options against the SA Framework to identify potential impacts against each SA Objective. As detailed previously, Rugby urban area, as the primary focus for growth in the Borough, is present in all of the spatial options for growth. The variation in option is therefore about the role that the rural area should take in meeting strategic housing targets. As such many of the potential impacts identified through the SA are common to all of the options considered. These can be viewed in the SA Report which accompanies the Preferred Options Local Plan.
- 4.10 Overall, the SA flagged up the potential for landscape impacts from all additional growth in rural locations as part of all options considered, however, this was to a lesser extent in the case of Option 1: Existing Balance and Option 4: Intensified Urban Focus. All of the options could benefit the vitality and viability of the town centre, support urban regeneration and facilitate the use of brownfield sites for new development. Good opportunities to use sustainable transport and reduce journey lengths are also likely to exist under all options, because of the focus on Rugby town.

APPENDICES

- APPENDIX 1: Current Housing Trajectory
- APPENDIX 2: Publication Housing Trajectory
- Appendix 3: New Main Rural Settlement
- APPENDIX 4: Assessment of Spatial Options

APPENDIX 1: The current housing trajectory

| | 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 | 2027-28 | 2028-29 | 2029-30 | 2030-31 | TOTAL |
|--|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|-------------|
| | PHASE 1 | | | | | | PHASE 2 | | | | | PHASE 3 | | | | | PHASE 4 | | | | |
| Completions | 338 | 456 | 448 | 425 | 534 | 376 | | | | | | | | | | | | | | | |
| Land at Leicester Road (R13/1609) | | | | | | | 6 | | | | | | | | | | | | | | 6 |
| Land south of Technology Drive (R15/2074) | | | | | | | 81 | 49 | 49 | 49 | 3 | | | | | | | | | | 231 |
| Cawston Grange (R04/1118/2137/B) | | | | | | | 8 | | | | | | | | | | | | | | 8 |
| Former Warwickshire College Site (R14/2229) | | | | | | | 40 | 23 | | | | | | | | | | | | | 63 |
| Coton House (R12/1353) | | | | | | | 34 | | | | | | | | | | | | | | 34 |
| Former Bilton Social Club (R15/2047) | | | | | | | 5 | | | | | | | | | | | | | | 5 |
| Ridgeway Farm, Ashlawn Road (R15/2239) | | | | | | | 35 | 50 | | | | | | | | | | | | | 85 |
| Williams Field - Cawston Extension (R15/0540) | | | | | | | 36 | 36 | 34 | | | | | | | | | | | | 106 |
| Land at Homefields, Dunchurch (R15/0507) | | | | | | | 26 | 22 | | | | | | | | | | | | | 48 |
| Rugby Radio Station (R11/0699) | | | | | | | 71 | 166 | 228 | 239 | 240 | 240 | 240 | 240 | 240 | 240 | 240 | 240 | 240 | 240 | 3104 |
| Back Lane South, Long Lawford (R12/1188) | | | | | | | 37 | 45 | 30 | | | | | | | | | | | | 112 |
| Former Ballast Pits (R14/1641) | | | | | | | 30 | 46 | | | | | | | | | | | | | 76 |
| Newbold Farm (R14/2369) | | | | | | | 9 | 4 | | | | | | | | | | | | | 13 |
| Tithe Farm, Montillo Drive (R13/1081) | | | | | | | 3 | | | | | | | | | | | | | | 3 |
| Cawston Lane Bellway (R11/1521) | | | | | | | 13 | 41 | 62 | 27 | | | | | | | | | | | 143 |
| Cawston Lane Ashberry (R11/1521) | | | | | | | 31 | 35 | 41 | | | | | | | | | | | | 107 |
| Cawston Extension William Davis (R11/0114/R16/1721) | | | | | | | 13 | 58 | 86 | 27 | | | | | | | | | | | 184 |
| Cawston Extension Linden Homes (R11/0114/R16/1780) | | | | | | | 20 | 52 | 52 | 52 | 52 | 18 | | | | | | | | | 246 |
| Former Bilton By-pass land west of Ivy Grange (R16/0658) | | | | | | | 14 | | | | | | | | | | | | | | 14 |
| Grange Farm Cottage, Coventry Road (R12/1947) | | | | | | | 10 | | | | | | | | | | | | | | 10 |
| 263- 273B Hillmorton Road | | | | | | | 2 | | | | | | | | | | | | | | 2 |
| 8 Hall Road, Wolvey Hall, Wolvey, LE10 3LG (R14/1897) | | | | | | | 6 | | | | | | | | | | | | | | 6 |
| Land rear of 22 The Green Bilton (R16/1722) | | | | | | | 5 | | | | | | | | | | | | | | 5 |
| Rear of 44-50 Hillmorton Road, CV22 5AD (R15/1190) | | | | | | | | 5 | | | | | | | | | | | | | 5 |
| Webb Ellis Industrial Estate Woodside Park (R16/0659) | | | | | | | | 44 | | | | | | | | | | | | | 44 |
| Webb Ellis Business Park (Prior Approval) | | | | | | | | 15 | | | | | | | | | | | | | 15 |
| 41 Wood Street (R15/1911) | | | | | | | | 6 | | | | | | | | | | | | | 6 |
| Eden Park (Gateway SUE R10/1272) | | | | | | | | 30 | 75 | 80 | 80 | 80 | 80 | 80 | 80 | 80 | 80 | 80 | 80 | 80 | 907 |
| 7 Market Place, CV21 3DY (R15/0787) | | | | | | | | 10 | | | | | | | | | | | | | 10 |
| Gateway Phase R4 (R15/2329) | | | | | | | | 10 | 40 | 40 | 32 | | | | | | | | | | 122 |
| Dipbar fields, Dunchurch (R13/0690) | | | | | | | | | 26 | 30 | 30 | | | | | | | | | | 86 |
| Land adjacent to 4 Princes Street (R13/0984 R14/0423) | | | | | | | | 6 | | | | | | | | | | | | | 6 |
| 9 Railway Terrace (R13/0340) | | | | | | | | | 14 | | | | | | | | | | | | 14 |
| 69 Temple Street (R15/0091) | | | | | | | | 7 | | | | | | | | | | | | | 7 |
| Clifton Rd Car Sales (R15/2528) | | | | | | | | | 6 | | | | | | | | | | | | 6 |
| Former Imperial Hotel, 165 Oxford St (R15/2257) | | | | | | | | | 14 | | | | | | | | | | | | 14 |
| The Stables, Green Lane, Brinklow, Rugby (R16/0960) | | | | | | | | | 7 | | | | | | | | | | | | 7 |
| The former Vault Nightclub and rear of 61, 64/65, 66 and 68 Church Street Rugby (R16/2423) | | | | | | | | 5 | | | | | | | | | | | | | 5 |
| 83-85 Claremont Road, Rugby (R16/2312) | | | | | | | | | 6 | | | | | | | | | | | | 6 |
| Newton Lane, Newton (R14/1658) | | | | | | | | 20 | 20 | | | | | | | | | | | | 40 |
| 26 Lawford Lane (R15/1448) | | | | | | | | 6 | | | | | | | | | | | | | 6 |
| 61 Lower Hillmorton Road (R15/1412) | | | | | | | | | 6 | | | | | | | | | | | | 6 |
| Colehurst Farm, Colehurst Lane (R17/0088) | | | | | | | | | 8 | | | | | | | | | | | | 8 |
| Land adjacent 15 Parkfield Road, Newbold (R14/2338) | | | | | | | | | 15 | | | | | | | | | | | | 15 |
| 50 - 52 Revent Street (R17/0513) | | | | | | | | 12 | | | | | | | | | | | | | 12 |
| Subject to signed S106 | | | | | | | | | | | | | | | | | | | | | |
| Land South of Coventry Road and North of Lime Tree Avenue (R15/1816) | | | | | | | | | 30 | 60 | 60 | | | | | | | | | | 150 |
| Land at Lower Hillmorton Road (part of the former college site) | | | | | | | | 17 | | | | | | | | | | | | | 17 |
| Wharf Farm (R15/1702) | | | | | | | | | 30 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 30 | | 380 |
| Windfalls | | | | | | | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 45 | 630 |
| TOTAL TRAJECTORY | 338 | 456 | 448 | 425 | 534 | 376 | 596 | 889 | 924 | 681 | 550 | 423 | 405 | 405 | 405 | 405 | 405 | 395 | 365 | 287 | 9712 |

Appendix 2: Publication Housing Trajectory

| | 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 | 2027-28 | 2028-29 | 2029-30 | 2030-31 | | | |
|---|--------------|------------|------------|------------|------------|------------|------------|--------------------------------|-------------|-------------|-------------|------------|------------|-------------|-------------|------------|------------|------------|------------|------------|--------------|-----|--|
| | PHASE 1 | | | | | | | PHASE 2 | | | | | PHASE 3 | | | | PHASE 4 | | | | | | |
| | Pre-adoption | | | | | | | 1st Five Years of adopted plan | | | | | | | | | | | | | | | |
| Past Completions at time of adoption(Net) | 338 | 456 | 448 | 425 | 534 | 376 | | | | | | | | | | | | | | | | | |
| Anticipated Completions pre adoption | | | | | | | 596 | | | | | | | | | | | | | | | | |
| Shortfall/Surplus against 540 dwellings per annum | -202 | -84 | -92 | -115 | -6 | -164 | 56 | | | | | | | | | | | | | | | | |
| Total Shortfall/Surplus | -607 | | | | | | | | | | | | | | | | | | | | | | |
| Annualised Requirement | 540 | 540 | 540 | 540 | 540 | 540 | 540 | 663 | 663 | 663 | 663 | 663 | 663 | 663 | 663 | 663 | 663 | 663 | 663 | 663 | 663 | | |
| Current Housing Trajectory | 338 | 456 | 448 | 425 | 534 | 376 | 596 | 889 | 924 | 681 | 550 | 423 | 405 | 405 | 405 | 405 | 405 | 395 | 365 | 287 | 9712 | | |
| Proposed Allocations | | | | | | | | | | | | | | | | | | | | | | | |
| Coton Park East Expansion | | | | | | | | | | 30 | 50 | 100 | 100 | 100 | 100 | 100 | 100 | 100 | 20 | | 800 | | |
| Coton House Expansion | | | | | | | | | | 25 | 40 | 35 | | | | | | | | | | 100 | |
| South West | | | | | | | | | | | | | | | | | | | | | | | |
| Bilton Fields, Ashlawn Road (MP) | | | | | | | | 50 | 80 | 80 | 80 | 80 | 80 | 80 | 80 | 80 | 80 | 80 | 10 | | 860 | | |
| Homestead Farm (WCC) | | | | | | | | | | 30 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | | | 350 | | |
| Land South Of Dunkleys Farm (WCC) (CTF, CTF E, CTF W) | | | | | | | | | | 30 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 430 | |
| Land South of Montague Rd (TW) | | | | | | | | | | 10 | 30 | | | | | | | | | | 40 | | |
| Land South of Montague Rd (RE & Swords) | | | | | | | | | | 30 | 40 | 40 | 40 | 40 | 40 | 30 | | | | | 260 | | |
| Coventry Road (G) | | | | | | | | | | 30 | 40 | 40 | 40 | 25 | | | | | | | | 175 | |
| Land West of Cawston Lane (G) | | | | | | | | | | | | | 30 | 40 | | | | | | | 70 | | |
| Land South of Alwyn Road (TW) | | | | | | | | | | | 10 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 370 | | |
| Land North of Dunkleys Farm (WCC) | | | | | | | | | | | | 30 | 40 | 40 | 40 | 40 | 40 | 5 | | | 235 | | |
| Deeley Land (DBS) | | | | | | | | | | | | | 30 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 310 | | |
| Land West of Cawston Lane (WCC) | | | | | | | | | | | | | 30 | 40 | 40 | 40 | 5 | | | | 155 | | |
| Cawston Spinney (DBS) | | | | | | | | | | | | | 30 | 40 | 40 | 40 | 40 | 40 | 40 | 40 | 310 | | |
| Garden Village Allocation | | | | | | | | | | | | | | | | | | | | | | | |
| Lodge Farm, A45 | | | | | | | | | | | | 25 | 80 | 80 | 80 | 80 | 80 | 80 | 80 | 80 | 80 | 665 | |
| Main Rural Settlements Allocations | | | | | | | | | | | | | | | | | | | | | | | |
| Wolvey | | | | | | | | | | 50 | 50 | | | | | | | | | | | 100 | |
| Stretton on Dunsmore | | | | | | | | | | 30 | 45 | | | | | | | | | | | 75 | |
| Ryton on Dunsmore | | | | | | | | | | 25 | 50 | | | | | | | | | | | 75 | |
| Brinklow | | | | | | | | | | 50 | 50 | | | | | | | | | | | 100 | |
| Binley Woods | | | | | | | | | | 30 | 32 | | | | | | | | | | | 62 | |
| Wolston | | | | | | | | | | 15 | | | | | | | | | | | | 15 | |
| Long Lawford | | | | | | | | | | 40 | 60 | | | | | | | | | | | 100 | |
| TOTAL TRAJECTORY | 338 | 456 | 448 | 425 | 534 | 376 | 596 | 939 | 1004 | 1186 | 1207 | 893 | 995 | 1040 | 1025 | 975 | 910 | 860 | 635 | 527 | 15369 | | |

APPENDIX 3: EXTRACT PREFERRED OPTIONS HOUSING BACKGROUND PAPER

NEW SETTLEMENT

Preferred Options Local Plan - Walsgrave Hill Farm proposed allocation

- 1.1 The Preferred Options Local Plan proposed the release of land from the Green Belt to accommodate a new settlement, at Walsgrave Hill Farm. Section 4, the PO HDBP, 2015 details the justification for inclusion of the Walsgrave Hill Farm site as a proposed allocation for housing delivery which will not be repeated here. However, it is worth noting the key considerations in proposing the release of the site and also reasons why this is no longer supported through the Publication Draft Local Plan.
- 1.2 A key part of this was justifying releasing land from the Green Belt. The NPPF is clear about the permanence of Green Belt boundaries and how they can be changed. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of Local Plans.
- 1.3 In considering the different spatial options for delivering the growth targets of the Local Plan section 4 of the PO HDBO, 2025, concluded the necessity of a new settlement in addition to growth a Rugby town and small scale growth at Main Rural Settlements (MRS). In identifying the location of the new settlement consideration was had to whether any of the existing Local Needs Settlements (LNS) could be expanded to a sufficient size to support a range of services similar to that of a MRS. No such sites were identified at any existing LNS to do this. There were also no sites located within the open countryside of a suitable size to be a MRS but there were a number of sites of this scale located within the Green Belt.
- 1.4 The PO HDBP, 2015 concluded that the exceptional circumstance had been met for the land to be released from the Green Belt. This led to the Local Plan Preferred Options allocating Walsgrave Hill Farm for 1,500 dwellings as a new MRS. The allocation boundary afforded the most self-contained site in comparison to the other Green Belt sites considered through the SHLAA, published alongside the Preferred Options in December 2015. It was concluded that the exceptional circumstance had been met for release of land from the Green Belt as no non Green Belt location had been identified through the SHLAA process that was capable of becoming a MRS. Furthermore the location of Walsgrave Hill Farm was considered to offer another housing market to that of Rugby town to deliver from at the same time as the proposed urban allocations of South West Rugby, Coton Park East, Rugby Radio Station and Rugby Gateway. This will then help in meeting the annual housing target by varying the portfolio of size and location of sites as advocated by the GL Hearn Housing Deliverability Study.

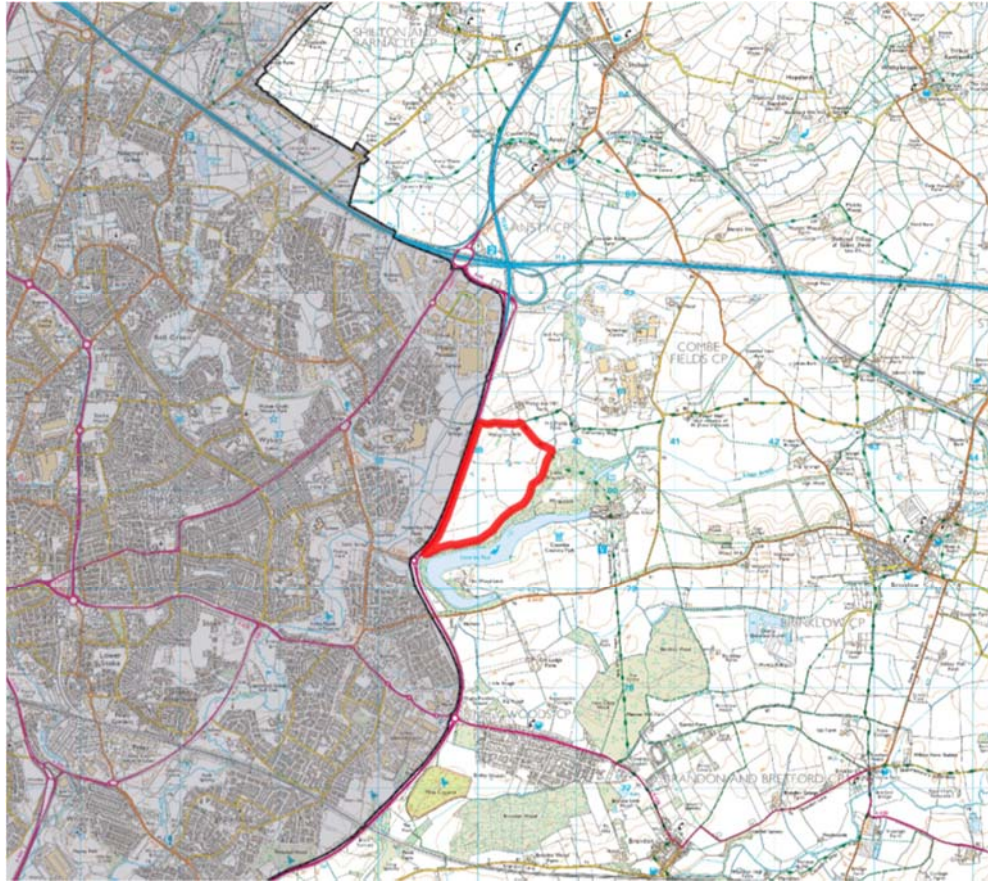


Figure 1: Location of the Walsgrave Hill Farm site

- 1.5 Delivery of this site is reliant upon the introduction of a new graded junction on the A46. Discussions with Warwickshire County Council Highways and Highways England (in conjunction with Coventry City Council) confirmed that the work was planned on the A46 and it was contained in Governments Road Investment Strategy for the 2015/16 – 2019/20 time period. The work on the A46 would enable a new junction which will allow for access to land within Rugby Borough.
- 1.6 In consideration of the above factors, the Preferred Options Local Plan proposed the release of Green Belt to accommodate a new settlement at Walsgrave Hill Farm. The PO HDPB, 2015 concluded on this point that the site selected represented the best option overall on location, deliverability, infrastructure and impact on the Green Belt. Furthermore, it was considered instrumental to the achievement of the housing target.

Preferred Options Consultation Responses

- 1.7 The Council consulted upon the Preferred Options Local Plan in December 2015 with the inclusion of Walsgrave Hill Farm allocation for residential development. The Council received representations which lead to a re evaluation of the proposed allocation. These are detailed below.

- 1.8 Highways England, who are a statutory consultee, made the following observation on the enabling of the site:

“Delivery of the site to the South of Walsgrave Hill Farm is reliant on Highways England’s proposal for a new grade separated junction on the A46 at Walsgrave. It is suggested that this scheme will be available by 2022. However, based on current information the completion date of the scheme could be 2025 or beyond unless significant developer contributions can be secured.”

- 1.9 The promoter of the Walsgrave Hill site consultation response stated that land to the north of the site, which is also within the same landownership, should be allocated for circa 90 hectares of employment land. The promoter considered that the employment allocation would be the enabler for the A46 work. This would help bring forward the delivery of housing on the site prior to the Local Plan Preferred Options proposed commencement of 2022.
- 1.10 Both Highways England and the site promoters’ responses raised concerns about continuation of the proposed allocation within the Local Plan of Walsgrave Hill Farm. With Highways England raising doubts on the timing of when the A46 improvements would be delivered, this questioned how much the site could be relied upon to deliver housing within the plan period.
- 1.11 Although the site promoter proposed a solution to bring forward the enabling works sooner, this would be of detriment to ability of the Local Plan to meet its growth targets. The employment land target for the entire plan period is 110Ha, so an increase of anything up to 90Ha would be significant. It would not be in accordance with the Coventry and Warwickshire Employment Memorandum of Understanding (MoU) in relation to how the unmet employment needs of Coventry needs would be distributed throughout Warwickshire. On this point, as set out within the Employment MoU, as is the case with unmet Coventry housing need, Rugby Borough Council has accommodated some of Coventry’s unmet employment need at Ansty and Ryton as set out within the Employment Background Paper.
- 1.12 Furthermore, as detailed in the Employment Background Paper, the NPPF requires that Local Plans must align their housing and employment growth within their plans. This is something which Inspectors have considered in detail during Examination in Public of Local Plans. The Employment Background Paper explains how the Publication Local Plan housing and employment land growth targets are aligned. An increase of up to 90Ha of employment land, which would almost double the employment target for the plan period, would inevitably require a significant increase in the housing target for the plan period growth to be aligned.
- 1.13 Such complications questioned the availability and deliverability of the site for housing delivery within the plan period and on the back of this questioned the continued exceptional circumstance for release from the Green Belt. Based on the Highway England’s Preferred

Option response, the best case scenario for housing delivery within the Plan Period, should the site commence in 2025, is 450 dwellings as opposed to 750 dwellings as previously assumed in the Preferred Options consultation. If this best case scenario were to be followed through, the shortfall of 300 dwellings would need to be found in another location.

- 1.14 To understand fully the potential for retaining the site within the local plan a meeting was held on the 25th May 2016 with Highway England, the site promoter and Coventry City Council. Although the site promoter stated that the site could come forward as a residential scheme and contribute to the A46 improvements, the preference was for further land to be allocated for employment uses. The site promoter tabled a scheme for the A46 graded junction but it was highlighted that the benefits of the scheme would not be realised based on a residential only scheme.
- 1.15 Highways England reaffirmed that the graded junction was a commitment in the Government's Regional Investment Strategy. The anticipated delivery was as originally advised to be by 2022, subject to programming. It was discussed that Highways England do not have scheme drawn up for the graded junction improvement and the site promoter's scheme would not be deliverable without the employment allocation. Following the meeting Highways England and the site promoter looked to hold separate discussions with the aim of creating a scheme to enable the site as a joint venture. No further update has been received on the progress of this work.
- 1.16 Although there was a clear keenness on the part of both parties to bring forward the grade improvement to the A46 and bring forward the site, neither were able to provide the deliverability of the enabling work alongside a residential only development that could meaningfully contribute towards the plan period.
- 1.17 Significant consultation responses to the proposed Walsgrave Hill Farm allocation were also received from Historic England and Natural England both of whom are statutory consultees. The Historic England response highlighted that the site is located on rising pastoral land between the A46 and Coombe Park, a popular public grade II* registered park and garden (Capability Brown) and conservation area. The park also contains numerous highly graded listed buildings including Coombe Abbey (Grade I listed building). Historic England raised concerns that no evidence had been gathered to demonstrate how an understanding of the proposed allocation site contributes to the significance of the heritage assets and how this informed the principle of development, nor without prejudice, the capacity and necessary design response. To further understand their concerns a meeting was held with Historic England on the 29th June 2016 where concern was raised again about the potential impact of development would have on the Capability Brown Registered Parks and Garden, which was viewed as being of national significance.

- 1.18 Natural England's consultation response highlighted that the Walsgrave Hill Farm site is directly adjacent to Coombe Pools Site of Special Scientific Interest which is noted for breeding birds and as a Country Park with managed access, which could have suffer potential adverse effects from development in close proximity of the designated site. Natural England requested that work is undertaken to understand the impact of the site on the adjacent SSSI designation. Natural England also advised that the site appeared to include areas of Grade 2 and Grade 3a Best Most Versatile land.
- 1.19 The responses from Historic England and Natural England were shared with the site promoter to try and establish how the site could mitigate against the concerns raised. A meeting was held with the developer where a plan displayed buffer zones to mitigate the sites impact from the concerns raised. However no plan or any evidence informing the buffers has been submitted to the Council. It is also viewed that with no agreed access arrangements into the site the impact on the SSSI and the historic assets cannot be judged.
- 1.20 Further to this, the Preferred Options Local Plan Consultation Responses Summary, September 2016, summarises the consultation responses to this proposed allocation: Whilst the location of the Walsgrave Hill Farm allocation on the Coventry edge was supported by some, the required Green Belt release was not supported by others who argued the exceptional circumstances required to justify such release did not exist and the allocation would therefore not be compliant with the NPPF.

Lodge Farm

- 1.21 The express purpose of the further call for sites that accompanied the Preferred Options consultation was to ensure the Council had appraised all potential site options through the SHLAA before progressing further with the Local Plan. This process identified a site submission

at Lodge Farm, a site located entirely within the countryside to the south of Rugby town, as shown in the plan below.

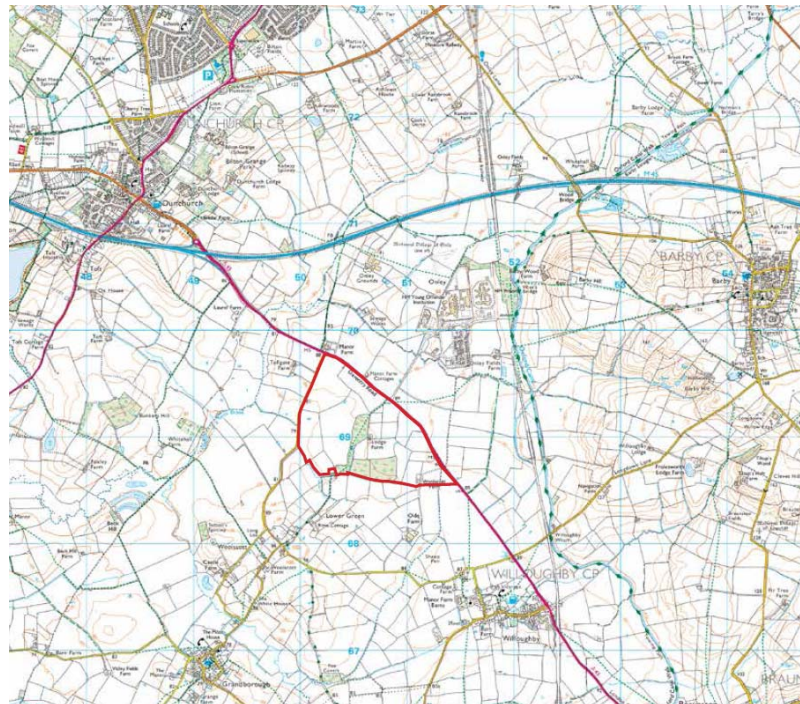


Figure 8: Location of the Lodge Farm site

- 1.22 The SHLAA 2016 updated assessed the Lodge Farm submission in terms of availability and suitability. The site is deliverable as it can be directly accessed off the A45 without any enabling works required. Furthermore, there are no designated historic asset or natural environment designations onsite or in close proximity which could either prevent or constrain the site coming forward. In addition to this the site is located entirely within Flood Zone 1 which the Environment Agency defined as being of Low Probability (of flooding). There are no other statutory constraints that are present on the site.
- 1.23 Turning to the consideration of highway constraints, the site can be accessed directly off the A45 with no strategic enabling work required. However, the impact on the network of the likely vehicle demands be generated from Lodge Farm were modelled alongside all other proposed Local Plan allocations. The outputs of this modelling are contained within the Strategic Transport Assessment (STA).
- 1.24 The STA concluded that the allocation of Lodge Farm will result in an increase in vehicle demands at Potsford Dam and Dunchurch Crossroads. This indicates that Lodge Farm trips will need to be considered when defining any highway mitigation in that area. On this basis the phasing of Lodge Farm will be reliant on the South West Link Road network being in place to enable the site to be delivered. However, the STA does note that the level of vehicle demands from Lodge Farm at Dunchurch Crossroads are lower than the levels likely to occur without the South West Link Road network in place.

- 1.25 This necessity for the South West Link Road network to support the Lodge Farm allocation is therefore reflected in Publication Draft Local Plan Policy DS10: Lodge Farm and also the Infrastructure Delivery Plan which assume the SWLR network will support delivery of the site. Both the policy and the IDP assume offsite financial contributions are required from Lodge Farm to deliver the SWLR network.

Duty to Cooperate

- 1.26 Given the proximity of the site to the administrative boundary with Northamptonshire and Daventry District Council, the Council has sought to fulfil its duty in bringing forward the site as an allocation. To this end, the Council has met with Daventry District Council to discuss the expectation of the site in terms of housing delivery and also associated infrastructure. In addition the Council has, along with Warwickshire County Council Highways and Education met with Daventry District Council and Northamptonshire County Council Highways and Education. The separate Duty to Cooperate Paper provides more detail on the discussion.

Publication Draft Local Plan – Lodge Farm proposed allocation

- 1.27 Whilst the Preferred Option proposed allocation of Walsgrave Hill Farm, with the site benefiting from being adjacent to Coventry, where some of the housing target is derived, the emergence of a developable and deliverable non Green Belt site means the NPPF exceptional circumstances for the Green Belt release can no longer be justified.
- 1.28 This is also coupled with the uncertainty of how Walsgrave Hill Farm site would take account of historic and natural environment constraints and therefore address the concerns raised by statutory consultees. Greater certainty on the timescales and funding for the access arrangements into the site would also be required in order for the Council to be able to demonstrate that the site was deliverable within the plan period.
- 1.29 Even if mitigating solutions were to be identified to address the constraints to delivery at Walsgrave Hill Farm, the NPPF is clear that exceptional circumstance must be present to justify release land from the Green Belt. With an alternative available non Green Belt site which does not have the same constraints to delivery, it is very difficult to justify that the exceptional circumstances exist. As such the Publication Draft Local Plan proposes allocation of Lodge Farm for residential development.
- 1.30 Although located in a rural area, the allocation of Lodge Farm as a new settlement will be of sufficient size to support onsite services and access to facilities. The site also has access to Rugby and Daventry with the potential to improve the existing bus service. It will become the largest Main Rural Settlement in the Borough. The Rural Sustainability Study demonstrates the level of services the existing Main Rural Settlements in the Borough can sustain to support a rural population. Publication Local Plan Policy DS10 seeks to achieve this level of service provision through a local centre to be incorporated into the masterplanning of the site.

APPENDIX 4: SUMMARY OF THE ASSESSMENT OF SPATIAL OPTIONS

| | Description | Pro | Con |
|---|---|---|---|
| Option 1: Existing balance | <ul style="list-style-type: none"> • Main focus is Rugby Town via infill development or urban extension; • MRS development occurs within existing settlement boundaries; • RS are limited to development that meets an identified need only. | <ul style="list-style-type: none"> • Prevents Green Belt release; • Development is focused within or adjacent to the most sustainable location in the Borough – Rugby Town; | <ul style="list-style-type: none"> • Existing Balance is currently adopted and insufficient housing is being delivered; • This approach will not produce a deliverable plan because a five year land supply cannot be demonstrated; • Further large scale, urban extension is likely to be constrained by infrastructure provision and market delivery; • Main Rural Settlements are constrained by their current boundaries and there is little potential for infill development |
| Option 2: Urban and Urban edge focus | <ul style="list-style-type: none"> • Main focus is Rugby Town via infill development or urban extension; • Where Rugby Town cannot accommodate all growth, additional development is focussed upon the edge of Coventry and Hinckley urban area; • Some boundary alterations are made to MRS; • RS are limited to development that meets an identified need only. | <ul style="list-style-type: none"> • Development is focused within or adjacent to the most sustainable location in the Borough – Rugby Town; • Varies the portfolio of sites to the greatest potential of all options because of development at the urban edges of adjacent settlements and extension to MRS; • Smaller sites can be allocated at the MRS which will be quicker to deliver and assist with five year supply; • Helps to support rural communities and facilities; • Development in the rural area will help to support local communities and facilities. | <ul style="list-style-type: none"> • Boundary alteration of MRS and development on edge of adjacent urban settlements will require Green Belt release; • Capacity for MRS expansion could be constrained by capacity of infrastructure and availability of local services; • Promoted sites on the Coventry edge are large and will require lead in time before delivery can commence; • The sustainability of a dispersed approach to growth could become a risk. |
| Option 3: Wider Focus | <ul style="list-style-type: none"> • Main focus is Rugby Town via infill development or urban extension; • Some boundary alterations are made to MRS; | <ul style="list-style-type: none"> • Development is focused within or adjacent to the most sustainable location in the Borough – Rugby Town; • Development in the rural area will help to support local communities and facilities | <ul style="list-style-type: none"> • Likely scale of expansion required to MRS to accommodate growth is significant. There are limited options to achieve this and it is likely to be unsustainable and constrained by |

| | | | |
|---|--|---|--|
| | <ul style="list-style-type: none"> • RS are limited to development that meets an identified need only. | <ul style="list-style-type: none"> • Smaller sites can be allocated at the MRS which will be quicker to deliver and assist with five year supply; • Will vary the portfolio of sites available, assisting delivery rates. | <p>capacity of infrastructure and availability of local services;</p> <ul style="list-style-type: none"> • There is very little capacity within LNS settlement boundaries; • The sustainability of a dispersed approach to growth could become a risk if it is not possible to provide sufficient services and infrastructure to support development; • Further large scale urban extension is likely to be constrained by infrastructure provision and market delivery. |
| <p>Option 4: Intensified Urban Focus</p> | <ul style="list-style-type: none"> • Main focus is Rugby Town via infill development or urban extension; • MRS are limited to development that meets an identified need only; • LNS development is restricted. | <ul style="list-style-type: none"> • Prevents Green Belt release; • Development is focused within or adjacent to the most sustainable location in the Borough – Rugby Town. | <ul style="list-style-type: none"> • This approach will not produce a deliverable plan because it is unlikely to place sufficient land into supply to meet the housing target and a five year land supply cannot be demonstrated; • Market delivery will not be increased because this option does not offer a variation in the portfolio of available sites; • Restricting development in the rural rea does not support rural communities or services; • Highway capacity constrains the urban edge. |
| <p>Option 5: New Town</p> | <ul style="list-style-type: none"> • Main focus is Rugby Town via infill development or urban extension; • Where Rugby Town cannot accommodate all growth, additional development is focussed a new MRS development occurs within existing settlement boundaries; • LNS accommodate small scale infill development. | <ul style="list-style-type: none"> • New MRS will be designed to accommodate all required services and infrastructure so would be a sustainable development; • GB release could be prevented if delivered in the countryside; • Infill at LNS will vary portfolio of available land and support existing communities and facilities; | <ul style="list-style-type: none"> • A new MRS is unlikely to resolve five year land supply because of its scale and infrastructure requirement; • A large scale new settlement will not vary the portfolio of available land within the Borough as much as other options; • Site options are not available outside the Green Belt so release of GB land would be required; |

