

Representations - Rugby Local Plan Issues and Option Consultation

Land to the North of the M6, Rugby, Warwickshire

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1. Introduction

1.1 Rugby Local Plan Review Issues and Options Consultation

- 1.1.1 The following representations are made in response to the Rugby Local Plan Review (RLPR) Regulation 18 Issues and Options Consultation document (October 2023) by L&Q Estates, in respect of our land interest at Land to the North of the M6, Rugby (The “Site” – see site location Plan at Appendix 1). The Site is approximately 217.64ha in size, of strategic scale and located outside of the Green Belt. It is being promoted for a mixed use strategic allocation, with associated community infrastructure. In addition to new homes, schools, local services, active travel routes and green/blue infrastructure, the Site has the potential to include land for strategic employment uses in proximity to Junction 1 of the M6 and the A5 Gibbet Roundabout.
- 1.1.2 L&Q Estates are aware of a neighbouring submission relating to the potential expansion of the Moto Rugby Motorway Service Area (MSA) on land adjacent to its existing site. Our proposals can be masterplanned in a manner that respects any such expansion to the Moto Rugby MSA.
- 1.1.3 These representations should be read alongside the completed Call for Sites Proforma, Site Location Plan and Opportunities and Constraints Plan that can be found in the Appendix.
- 1.1.4 These representations have regard to the emphasis in the National Planning Policy Framework (NPPF) on the role of development plans in providing a framework for meeting housing needs and addressing other economic, social and environmental priorities (paragraph 15) and in supporting the Government’s objective of significantly boosting the supply of homes, through ensuring that a sufficient amount and variety of land can come forward where it is needed.
- 1.1.5 The representations also have regard to the statutory duty for local planning authorities to co-operate with other local planning authorities, county councils and prescribed bodies relating to strategic matters when preparing development plan documents.

1.2 Background

- 1.2.1 The current Rugby Local Plan 2011-2031 was adopted in June 2019 and national policy requires local plans to be reviewed every five years to determine whether policies have become out-of-date and require updating. It is noted that a decision was taken in December 2022 to undertake a full update of the local plan and that the Local Plan Review Issues and Options Consultation and Call for Sites provides the first opportunity for interested parties to comment on the process.



1.2.2 The sections that follow reflect the structure of the Council's Issues and Options Consultation Document, October 2023 and provide responses to a number of the questions posed, covering the following:

- Land for Employment Uses
- Town Centre Regeneration
- Climate Change Policies
- Design Coding and Guidance
- Land for Housebuilding

1.2.3 This submission also introduces the Land to the North of the M6, Rugby as a location for the strategic growth of Rugby over the period to 2041 and beyond. The submission is therefore accompanied by a completed Call for Sites Proforma. L&Q Estates would welcome the opportunity to discuss the site with the Council as it makes further progress with its Local Plan Review and to actively engage in the on-going local plan making process.

2. Representations to the Issues and Options Consultation

2.1 Land for Employment Uses (Questions 1 to 6)

2.1.1 L&Q Estates welcomes the work that has been undertaken to consider longer term employment needs since the adoption of the Rugby Local Plan in 2019. It is also noted that a new West Midlands Employment Sites Study is being undertaken to find opportunity sites for potential future supply and shape how strategic needs will be split between the Coventry and Warwickshire local authority areas. The recognition that Rugby Borough Council will need to contribute towards meeting some of the identified need for strategic warehousing is supported.

2.1.2 The need to build a strong, competitive economy is central to national planning policy. Rugby Borough is well positioned to support the delivery of employment development and the Local Plan should provide policies that are flexible enough to support the area's potential for economic growth in full. In particular, it is essential that the Council's evidence and planning policies fully considers the locational requirements of different sectors, including Coventry and Warwickshire's strategic warehousing need.

2.1.3 L&Q Estates supports the identification of M6 Junction 1 as a potential location for the allocation of further employment land. Land to the north of Junction 1 has good access to the M6 and A5 corridors and can form a strategic and sustainable location for growth in proximity to Rugby town. This area provides a significant opportunity to



accommodate both employment and housing growth over the period to 2041 and 2050. It is located outside of the Green Belt and is therefore well positioned to support a sustainable pattern of growth with the potential to deliver benefits to the borough's economy by making a significant contribution towards meeting recognised local and strategic development needs.

2.2 Town Centre Regeneration (Questions 7 to 11)

2.2.1 L&Q Estates welcome the intention to review local plan policies relating to Rugby town centre. This will not only allow changes to be made to reflect the latest national policy but will also ensure that a continued focus is given to the regeneration of the Borough's main settlement.

2.2.2 Where applicable, district and local centres should be identified within any new strategic housing and employment allocations. This will ensure that growth comes forward alongside appropriate community infrastructure. Similarly, locations for further growth in proximity to Rugby, such as the land to the north of Junction 1 of the M6, have the potential to support a strategy for growth that continues to be centred on sustainable links to the Town to support its continued regeneration.

2.3 Climate Change Policies (Questions 21 and 23)

Question 21

2.3.1 Any proposed introduction of a tree canopy policy would need to be robustly evidenced and justified in the context of wider national and local climate change and Biodiversity Net Gain requirements.

2.3.2 Should such an approach be justified, sufficient flexibility should be provided within any policy that seeks to introduce a minimum target for tree canopy cover within new developments. For example, Cornwall Council's Climate Change DPD Policy G3 recognises that there will be circumstances where a percentage target of 15% cannot be achieved and provides an approach for applicants to agree an alternative with the Local Authority.

Question 23

2.3.3 The Local Plan should explore the potential to bring forward strategic development that enables the delivery of green and blue infrastructure at a scale that replicates a country park and has the potential to become a significant community asset. This would then form an integral component of the on-site strategy to achieve healthy, inclusive and safe places. L&Q Estates' approach to planning for strategic development would enable this and provide the opportunity for the creation of a legacy company to secure sustainability, quality and longevity.



2.4 Design Coding and Guidance (Questions 29 and 30)

- 2.4.1 National policy places a strong emphasis on achieving well-designed and beautiful places. It is therefore important that local plans set out a clear design vision. This can be achieved through a local design guide or design code(s) that reflect relevant national guidance on design. L&Q Estates would welcome the opportunity to work collaboratively with the local planning authority to develop design guidance to support the delivery of its developments.

2.5 Land for Housebuilding (Questions 31, 32, and 33)

Question 31

- 2.5.1 The Planning Practice Guidance is clear in its approach that the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. The HEDNA 2022 derived housing need should also be regarded as a minimum in light of the fact that the alternative demographic projection of the HEDNA and its future growth forecasts being conservative. In addition, it is considered likely that Rugby will again need to accommodate unmet housing needs in Coventry.
- 2.5.2 The Government published the revised National Planning Policy Framework (NPPF) on 19 December 2023 following the ‘Levelling-up and Regeneration Bill (LURB): reforms to national planning policy’ consultation published on 22 December 2022. In the context of determining how many homes Rugby should be planning for, it is crucial to highlight that the LURB confirmed that ‘the government remains committed to delivering 300,000 homes a year by the mid-2020s and many of the immediate changes focus on how we plan to deliver the homes our communities need.’
- 2.5.3 The revised NPPF does not weaken the Government’s overarching target of delivering 300,000 homes a year. Therefore, the assessment of Rugby’s housing need is to be undertaken in this context.
- 2.5.4 Section 5 of the previous NPPF sought to ensure delivering of a sufficient supply of homes where they are needed, and that the needs of groups with specific housing requirements are addressed and the land with permission is developed without unnecessary delay (Paragraph 60). The December 2023 revision of the NPPF added the following sentence to Paragraph 60, confirming that local authorities should meet as much of their housing need as possible:
- ‘The overall aim should be to meet as much housing need as possible with an appropriate mix of housing types to meet the needs of communities.’*
- 2.5.5 The Planning Practice Guidance (PPG) is clear in its approach that the ‘standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area’ (Paragraph 010 Reference ID:

2a-010-20201216). The Rugby Local Plan should therefore reflect that the proposed housing need figure is only the starting point and additional housing may be required to facilitate economic growth or the delivery of affordable housing. Indeed, Paragraph 61 of the NPPF has been amended as follows:

- 2.5.6 *‘To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.’*
- 2.5.7 This revised text referring to the standard method as an ‘advisory starting-point’ indicates that local authorities will now have greater flexibility to determine whether housing need is either higher or lower than the Standard Method calculation for their area, owing to characteristics specific to their area. Paragraph 67 highlights reasons as to why a housing requirement may exceed the Standard Method:
- ‘Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.’*
- 2.5.8 It is therefore imperative that consideration to any circumstances which may lead to an assessment of housing need which exceeds Standard Method are fully explored, and the true ‘unconstrained’ housing need for the area is established.
- 2.5.9 The consultation document sets out that, as of summer 2023, the housing requirement for Rugby Borough calculated using the standard method is 506 homes per year.
- 2.5.10 The Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) (2022), which was commissioned by the six Coventry and Warwickshire local authorities, provides an alternative figure. The HEDNA uses the most up to date data available to produce a projection for future population growth and growth in the number of households. The affordability uplift used in the Government’s standard method is then applied to give a housing need figure.
- 2.5.11 The HEDNA’s 2021-2041 annual housing need figure for Rugby Borough was 735 homes per year using 2021 affordability data. This number could be recalculated using the latest 2022 affordability data and a 2023 base date, which would reduce the figure to 672 homes per year.



- 2.5.12 The Council is seeking to determine whether the standard method figure of 506 homes per year or the HEDNA figure of 672 homes per year (recalculated using the latest 2022 affordability data and a 2023 base date) is most appropriate for its plan making process.
- 2.5.13 In response to this, it is considered that the Council should treat the housing need set out within the revised standard method of the HEDNA as a minimum when taking into account the following circumstances:
- a) Recent trends in international net migration to the UK
- 2.5.14 The consultation document (at paragraph 9.11) considers that the overestimation of Coventry's population within the HEDNA (which is a longstanding issue acknowledged by the Office for National Statistics) leads to an overestimation of the population and need for housing in the Coventry and Warwickshire Housing Market Area within the government's standard method. However, in our submission, it is not considered that the alternative demographic projection of the HEDNA represents an overestimation of the population (and need) for housing in the Housing Market Area, particularly when taking into account trends in international net migration to the UK and additional factors such as economic growth and affordable housing need.
- 2.5.15 The HEDNA does not appear to comment on international migration trends and how this may have affected population growth. The 2014-based ONS Sub National Population Projections, which underpin the Standard Method, and which the HEDNA's alternative demographic projections seeks to replace, were based on international net migration to the UK of +185,000 people per annum.
- 2.5.16 However, the December 2022 'long-term international immigration, emigration and net migration flows, provisional' show significantly higher levels of net international immigration to the UK since the year ending September 2021. The average net international migration over the period since December 2018 has been approximately 300,000 per annum, even taking into account the period when Covid-19 restrictions on international travel were in place.
- 2.5.17 This is significantly higher than the 2014-based ONS SNPP assumption of +185,000 people per annum. Therefore, it is considered that recent trends in international net migration to the UK could mean that the alternative demographic projection of the HEDNA represents a conservative scenario.
- b) Future job growth forecasts used in preparing the HEDNA may be conservative
- 2.5.18 When establishing a housing requirement figure for an area, local authorities should reflect growth ambitions linked to economic development in order to align the growth in housing with job creation.
- 2.5.19 The 2022 HEDNA concludes that 735 dwellings per annum will accommodate forecast job growth based on a range of demographic modelling assumptions. It uses



the Cambridge Econometrics (CE) March 2021 baseline economic growth forecast. This forecast was prepared during the COVID-19 lockdown when economic growth was far from certain and was informed by uncertain conditions.

- 2.5.20 In simple terms, the CE forecasts were based on a 3.6% increase in GDP in 2021 and a 2.8% increase in GDP in 2022. Reference to the ONS' December 2022 GDP monthly estimate report states how GDP is estimated to have grown by 4% in 2022, following growth of 7.6% in 2021.
- 2.5.21 Furthermore, the HEDNA identifies that 551 hectares of logistics floorspace is needed across the housing market area to 2041. However, the location for this land has not been confirmed and so the job growth associated within it has not been considered.
- 2.5.22 It is hence considered that the future growth forecasts used in preparing the HEDNA are pessimistic. The housing requirement figure is likely to need to increase in line with job growth which has performed better than anticipated within the 2022 HEDNA.

c) Additional factors such as affordable housing need

- 2.5.23 The 2022 HEDNA describes affordable housing need across the HMA as 'clearly acute' and identifies a 'notable need' for affordable housing. It also states how it is clear that provision of new affordable housing is an 'important and pressing issue in the area.'
- 2.5.24 Addressing affordable housing need in a meaningful way will require an uplift to the HEDNA's revised standard method calculation to take account of affordability.

d) Unmet housing need from Coventry

- 2.5.25 The current Rugby Borough Local Plan 2011-2031 plans for 12,400 additional homes over the twenty-year plan period. Of these, 2,800 are homes that Coventry City Council was unable to accommodate within its administrative area.
- 2.5.26 The ability for any city to adequately plan for additional housing depends on whether it can meet its own needs in the first place. One key issue preventing some authorities (including Coventry) from meeting their own needs is Green Belt.
- 2.5.27 Coventry City Council is currently in the process of reviewing its Local Plan and establishing a housing requirement figure for its area. Flatted developments and an increased likelihood of viability issues on brownfield sites in Coventry could mean that meeting the total annual affordable housing need in Coventry would be much more challenging than predicted within the Coventry and Warwickshire HEDNA.
- 2.5.28 Coventry's Local Plan Review is at a very early stage of preparation and the Council is yet to select a strategic option for growth. Once the Council has determined what figure sets an appropriate strategic need, a full assessment can then be undertaken

in terms of the growth that can realistically be delivered within Coventry's administrative area.

- 2.5.29 Housing needs that cannot be met within neighbouring areas must be met as close as possible to those areas, or within areas where sustainable transport connections can easily be made to those areas. Through the Duty to Co-operate, Rugby has a responsibility to help address any unmet needs from Coventry.
- 2.5.30 The housing requirement figure for Rugby Borough may well be higher than the identified housing need if it is to include provision for neighbouring areas, particularly Coventry.

Question 32

- 2.5.31 L&Q Estates recognise the need to increase the delivery of both market and affordable housing to meet recognised needs. Making sufficient provision for housing is central to strategic plan making and a variety of mechanisms that aim to improve and develop new affordable housing should be explored.

Question 33

- 2.5.32 L&Q Estates note the broad locations that have been identified. The Plan's spatial strategy should continue to seek to centre growth at locations that relate to the borough's most sustainable settlements, with any new strategic allocations focusing on the town of Rugby. Such an approach will enable a strategy for the pattern, scale and design quality of places that enables sustainable economic growth over the period to 2041 and beyond. Land to the north of M6 Junction 1 can significantly assist such an approach through a comprehensive development that has the potential to support the delivery of new homes and jobs, alongside community infrastructure.

2.6 Other Topics (Question 37)

- 2.6.1 L&Q Estates notes the intention to increase the emphasis that the local plan gives to sustainable travel to accord with Warwickshire County Council's new Local Transport Plan 4 and that a Transport Plan for Rugby is being prepared.



3. Land to the North of the M6, Rugby

3.1 Site Description

- 3.1.1 The land to the North of M6 Junction 1 (the “Site”) comprises approximately 217.64ha of land located to the north of the urban area of Rugby. The site consists of a series of predominately open, arable fields with a network of hedgerows, some pockets of woodland and some water bodies. The A426 bisects the site in a roughly north-south direction linking the M6 with the A5.
- 3.1.2 The following are appended to this document:
- Appendix A: Call for Sites Proforma
 - Appendix B: Site Location Plan
 - Appendix C: Site Opportunities and Constraints Plan
- 3.1.3 The Site is in single ownership and is available for development for residential and employment purposes. There is no over-riding constraint on the land which cannot be either resolved through design or adequately mitigated. The site is located outside of the Green Belt and is suitably located to support the delivery of a sustainable direction for growth for Rugby that integrates housing, employment and community infrastructure, embedding sustainability principles.
- 3.1.4 The Site can be successfully developed, taking into account all the relevant constraints, to deliver in the order of 100ha of net developable land. The Site will be the subject of a high level masterplanning exercise to set a high quality design vision. It has the potential to secure a development of approximately 3500 dwellings, or alternatively, a mixed-use masterplan that can provide new homes and strategic employment land in proximity to Junction 1 of the M6 and the A5 Gibbet Roundabout. The Site is suitable, developable and deliverable and is available for allocation for residential or employment development. It is considered that the inclusion of an element of employment land in this location has strong potential to support the delivery of an established strategic requirement.
- 3.1.5 Topographically, the site rises from the River Swift, which runs along its western boundary. There are no specific landscape designations and it is well contained to the north, east and south given the backdrop of urban form. The landscape is more open to the west. The majority of the site is within flood zone 1, with an area of land adjacent to the River Swift within flood zones 2 and 3. A sustainable urban drainage scheme will therefore be developed for the Site.
- 3.1.6 Taking the above into account, the west of the Site provides the opportunity for the creation of open space at the scale of a new Country Park. This can support the delivery of biodiversity net gain and form a significant recreational resource for the

local community. The inclusion of open space at a strategic scale provides the opportunity to explore the creation of a legacy company to secure long-term sustainability, quality and longevity. Existing public rights of way can be integrated within new green infrastructure and create the opportunity to link into existing publicly accessible green infrastructure to the south of the M6. The delivery of a significant area of open space to the west of the site would also act as an area for biodiversity net gain whilst providing an area of separation and resource for Churchover, where there is a conservation area and a number of listed buildings.

3.1.7 Coton House Estate is located to the south of the Site. There are listed buildings and a Scheduled Ancient Monuments in this area, which would be carefully considered through masterplanning and at the detailed design stage.

3.1.8 In conclusion, the site can offer a number of key opportunities:

- A large area of land adjacent to Rugby's urban area that is in single ownership that is available for development and outside of the Green Belt
- An area for strategic scale, sustainable housing and employment growth to the north of Rugby town, embedding high quality design principles to sustainably deliver against established needs
- The opportunity to create a high quality design led scheme with longevity secured through a legacy led approach
- Strategic employment land with key and quick access to the highway and motorway network
- A new district centre, including shops, schools and community facilities at the heart of the development
- An upgraded and extended Green/Blue Infrastructure network along with the provision of communal cycle facilities to provide enhanced pedestrian/cycle links within the site and towards Rugby town.
- The creation of substantial areas of naturalistic public parkland affording long distance views and supporting improvements to biodiversity and tree planting.
- Open space will be retained and significantly improved to protect the settings of Churchover and Coton House Estate and provide a resource for both existing and new residents.

3.1.9 L&Q Estates would welcome an opportunity to engage with Council as progress is made with the masterplanning of the Site and welcomes the opportunity to submit representations at the Issues and Options Stage of the Local Plan Review.



APPENDIX A – CALL FOR SITES PROFORMA



APPENDIX B – SITE LOCATION PLAN

APPENDIX C – SITE OPPORTUNITIES AND CONSTRAINTS PLAN