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Issues and Options Consultation
Development Strategy
Rugby Borough Council
Town Hall
Evreux Way
Rugby
CV21 2RR

Date: 2 February 2024

Our Ref: NP M5/0405-16

By email only:
localplan@rugby.gov.uk

Dear Sir/Madam

RE: RUGBY LOCAL PLAN REVIEW - ISSUES AND OPTIONS CONSULTATION

Tetlow King Planning represents the **West Midlands Housing Association Planning Consortium (WMHAPC)** which includes leading housing associations across the West Midland. Our clients' principal concern is to optimise the provision of affordable housing through the preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the West Midlands region.

As significant developers and investors in local people, the WMHAPC is well placed to contribute to Local Plan objectives and act as long-term partners in the community. Our clients play an active role in affordable housing delivery in Rugby and so welcome this opportunity to contribute to the Local Plan review.

We welcome the opportunity to comment on the Local Plan review Issues and Options consultation and recognise it is an important step in the production of a new Local Plan. The current Local Plan 2011-2031 was adopted in June 2019 and will soon be more than five years old and out-of-date when considered against the National Planning Policy Framework (NPPF, 2023). It is encouraging that Rugby Borough Council is being proactive and preparing a new Local Plan to account for updates to national policy.

The Local Plan Review issues and options consultation provides several consultation questions to gather feedback on where the Local Plan should place its aims and objectives. Our response to these consultation questions are provided below.

7. Climate Change Policies

Consultation Question 21: Should we adopt a minimum tree canopy policy for new development?

Promoting sustainable development is the core objective of the plan system and it is important that all new developments continue to support this aim. This importance was underlined in the December 2023 Written Ministerial Statement on energy efficiency and environmental standards. The Housing Associations of the WMHAPC recognise the critical role that they play in ensuring that residents have a healthy and sustainable place to live. However, we ask the Council to be wary of the ways in which policies could impact development viability which may restrict the overall provision of affordable housing in Rugby.

Consultation Question 22: Should we identify priority locations or allocate sites for biodiversity net gain for sites which are unable to provide all the net gain on site and, if so, where?

The WMHAPC agrees that priority locations or allocated sites should be identified for biodiversity net gain (BNG) when sites are unable to provide all of the net gain on site. In doing so, this will ensure that developers have more flexibility and will not be as restricted due to viability issues. This in turn will help to ensure more housing can be provided.

Regarding BNG requirements, paragraph 7.25 of the consultation document alludes to the possibility of the Local Plan requiring more than the 10% BNG requirement stated by the Environment Act. If the Council is looking to introduce a higher threshold than 10%, this must be robustly viability tested to show that it will be viable for applicants to provide such BNG alongside development. There is significant concern that an increased biodiversity net gain requirement may reduce the delivery of affordable housing across the authority.

The WMHAPC welcomes the production of a BNG supplementary planning document and/or a further implementation note/guidance following the adoption of the Local Plan.

Consultation Question 25: We are considering requiring all new residential developments to be net zero. Do you agree?

Whilst the WMHAPC acknowledges the importance of promoting sustainable development, we ask the Council to be wary of the ways in which such policies could impact development viability which may restrict the provision of affordable housing in Rugby. Reducing operational CO2 to net zero would represent a 25% greater target than that set to be implemented in the Government's Future Homes Standard (FHS) by 2025. Furthermore, having majorly differing standards for compliance provides a fragmented approach to net zero targets, which can result in a lack of clarity on what is considered compliant and creating a postcode method of compliance. We would like to remind the Council that the Government's FHS 2025 seeks a 75% reduction with the remaining 25% reduction being achieved through decarbonisation of the national grid, therefore providing an operational zero approach.

9. Land for housebuilding

Consultation Question 31: How many homes should we be planning for?

The WMHAPC welcomes the use of the Standard Method 2023 figure of 506 dwellings per annum but recommends that this figure should be set as a minimum requirement. We support the Council's proposal to apply the 2022 HEDNA figure and set a higher housing requirement than that required by the standard method. This additional headroom will allow for choice and competition in the housing market and means that the Local Plan will be resilient to uncertainties such as a delay in developing a particular site or changes to housing needs or Government policy.

In addition to the positives set out above, by requiring a higher overall quantum of housing in Rugby over the plan period, the requirement will help to maximise affordable housing delivery over the plan period as a percentage of overall delivery. This will help to ensure that identified affordable housing needs are met. We are reassured that the Council is seeking to boost both market and affordable housing delivery in Rugby and fully welcome the ambitious housing delivery requirements.

Consultation Question 32: Would you support RBC both improving existing and developing new social and affordable housing (like the regeneration of Rounds Gardens and Biart Place)?

The WMHAPC would support Local Plan policies which would both improve and develop new social and affordable housing in Rugby. Providing high quality and affordable homes should be a key priority in the new Local Plan.

Consultation Question 34: Do you support a requirement for all new dwellings to meet the additional Building Regulations standard for accessible and adaptable dwellings and for at least ten percent of dwellings to be suitable for wheelchair users?

We accept that there is a growing need for properties which comply with current Building Regulations and so we support this policy direction, although we would like to remind the Council that the increased delivery of such properties may affect viability and overall affordable housing delivery in Rugby.

We are aware that M4(2)/M4(3) requirements are challenging to achieve in terms of level access on sites where there are topography issues, so planning policy should acknowledge this as it will not always be possible to achieve this on sites. There may also be viability considerations around the provision of lifts which may also make the provision of level access challenging to achieve and this should be considered when setting requirements.

Consultation Question 35: Please provide any other comments you have on the type and size of new homes we need.

When formulating the new policies for the types and sizes of new homes required, the WMHAPC recommends that the Local Plan considers and refers to the latest housing needs evidence base (currently the 2022 HEDNA).

Further comments

We would like the Local Plan to acknowledge the role of Housing Associations in providing affordable housing in Rugby. It would be beneficial to see the Council recognise the role of Housing Associations and encourage developers to have early active engagement with Housing Associations in the preparation of planning proposals. Early engagement enables Housing Associations to have an active role in the planning and design of developments to ensure that the development addresses local housing needs and meets the management requirements of WMHAPC members.

We would like to use this opportunity to highlight the successful proven track record that Community Land Trusts (CLTs) have in delivering affordable housing for local people. The Council may find it insightful to know that a number of the WMHAPC Housing Associations have delivered significant levels of affordable housing through partnerships with CLTs across the West Midlands. Therefore, it would be particularly useful if the Local Plan acknowledges this working relationship in order to encourage commitment in the Local Plan to support CLTs in their choice of sites.

The above comments are intended to be constructive, to ensure the policies are found sound at examination. We would like to be consulted on further stages of the above document and other publications by the Council, by email only to consultation@tetlow-king.co.uk; please ensure that the West Midlands Housing Association Planning Consortium is retained on the consultation database, with Tetlow King Planning listed as its agent.

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ASSISTANT PLANNER

For and On Behalf Of

TETLOW KING PLANNING

[REDACTED]

cc: Bromford
Citizen Housing Group
Platform Housing Group

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