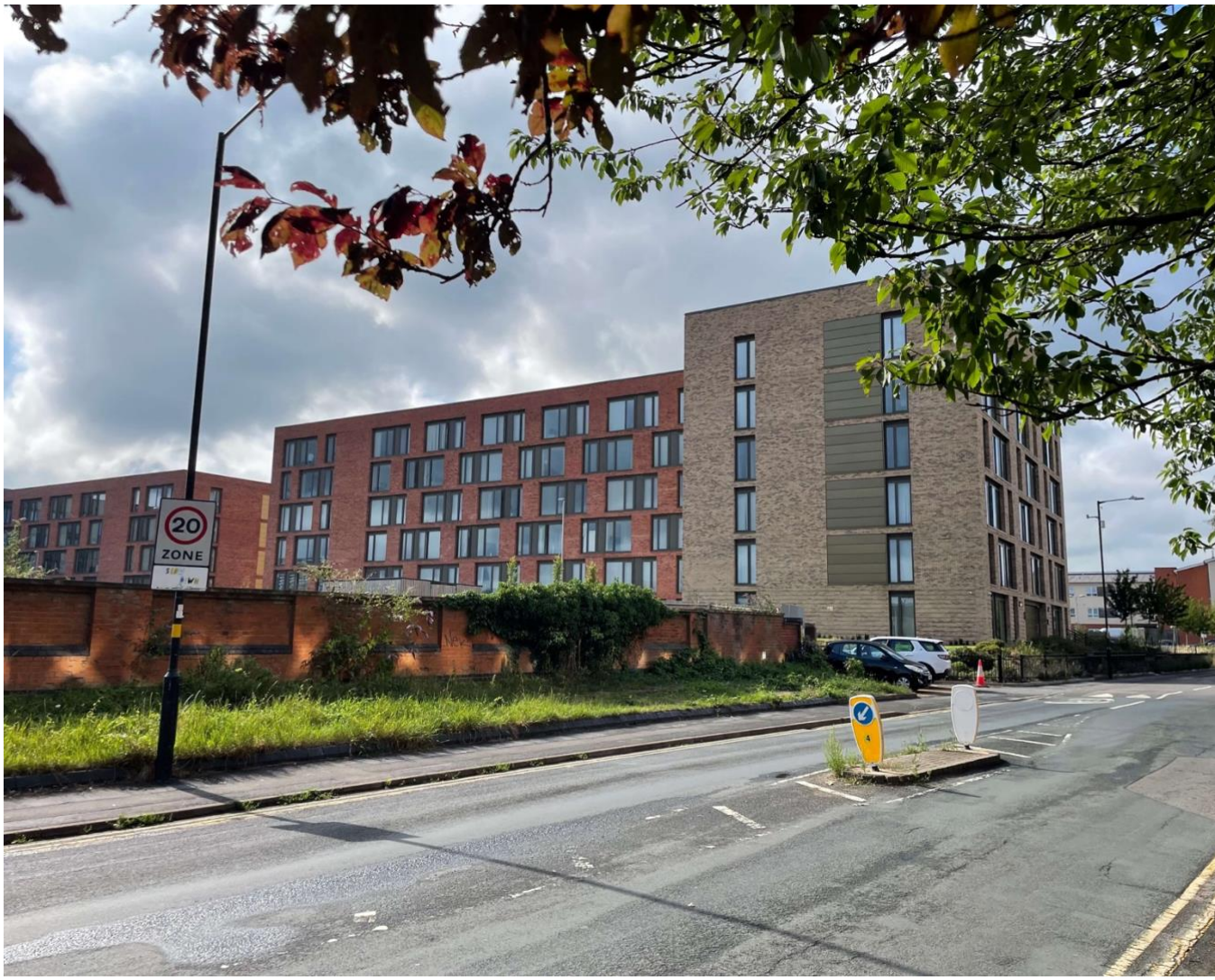

TROY
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Urban Capacity Study

For: Rugby Borough Council

Final Report
November 2025

RUGBY BOROUGH COUNCIL
Urban Capacity Study
Planning Policy
www.rugby.gov.uk

Final Report
November 2025

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FRONT COVER: New Housing, Rugby

Contents

1. Introduction

This study

1.1 This is a report of the Urban Capacity Study (UCS) prepared on behalf of Rugby Borough Council (RBC / the Council) by Troy Planning + Design. It seeks to quantify the potential for accommodating new homes on land and buildings within the built-up area of the settlement of Rugby, and which might contribute towards meeting the housing requirements for the Borough. It is accompanied by mapping and schedules of potential development sites.

1.2 The study supplements the Housing and Economic Land Availability Assessment (HELAA) prepared by the Council. It seeks to establish the additional potential for accommodating new homes in the Borough over and above that identified in the HELAA.

1.3 The study has purposely followed a different approach to that undertaken in the HELAA: the UCS is intended to be a proactive approach to site identification, and which might be used to help unlock development opportunities in the existing settlement area. It is a technical document and is intended to inform policy decisions to be taken by the Council in the production of its Local Plan.

1.4 It is important to note that the UCS is not a statement of policy, and the inclusion of a site within the study does not constitute an allocation and nor does it influence planning applications or decisions.

Context for the study

1.5 Work has commenced on the review of the Rugby Local Plan and the UCS will comprise part of the evidence underpinning that. The housing need figure for the Borough as a whole, as based on the government's standard method, is 636 new homes per annum.

1.6 Some of the housing requirement will be met by existing commitments and large allocations, including strategic growth sites to the southwest of Rugby and at Houlton. Other sites are required to help meet the requirement. The Council has, through its HELAA, identified opportunities for development across the Borough. However, the HELAA only resulted in two brownfield urban sites in Rugby being considered appropriate for allocation, with the result being that extensive greenfield land releases may be required to meet housing requirements.

1.7 The Regulation 18 consultation responses to the draft Local Plan (March 2025, Preferred Option Consultation Document) suggested that opportunities should be

taken to bring forward previously developed land for new homes in Rugby as opposed to releasing greenfield land. The purpose of the UCS is thus to explore these opportunities.

1.8 The sites in the HELAA are, in the main, those that have been submitted to the Council by landowners or developers. Over the last decade (and more) the approach to housing land availability assessment has perhaps underplayed the potential that urban areas afford. The UCS thus seeks to identify opportunities for further development over and above those within the HELAA. It reflects national policy which encourages a proactive approach to site identification, with para. 126 of the NPPF stating:

"Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes."

1.9 This is expanded upon in Planning Practice Guidance (Housing and Economic Land Availability Assessment, July 2019) which states that *"plan-makers need to be proactive in identifying as wide a range of sites and broad locations for development as possible"*, and that plan-makers should *"not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process that may assist in meeting the development needs of an area"*.

Study method

1.10 The broad stages of work undertaken are outlined below and elaborated upon as appropriate in the main body of the report.

a) An initial mapping exercise defined the extent of the areas to be surveyed, reflecting the established Rugby settlement boundary. This also mapped existing allocations and commitments as well as those sites considered acceptable within the HELAA. The purpose of this was to avoid double-counting or duplicating these sites within the UCS, with the purpose of the UCS being to identify potential sites over and above those already considered and or in the development pipeline.

b) Catchment areas around the town centre and railway station were mapped, being places in closest proximity to services and facilities, and which comprise 'more sustainable' locations for growth. Catchment areas were based on the street network as opposed to an 'as the crow flies' distance and reflected recognised travel times by foot, e.g.: an 800 metre or ten-minute

travel time from the edge of the town centre or railway station. These areas formed the focus of the search for development opportunities during site visits (albeit all sites identified in the initial stages were visited – see below).

c) Sites were initially identified through a desk-based review process. This included recording all sites in the HELAA on a database as well as those sites identified as having potential through other sources, including the Brownfield Land Register and the Rugby Regeneration Strategy. Alongside this a project specific 'Call for Sites' was undertaken. Furthermore, a review of mapping and aerial photography was undertaken to identify other opportunities that might offer potential for development. All were recorded on the database for consideration.

d) Visits to all sites identified were made. This included more 'forensic' visits on a street-by-street basis within the catchment areas around the town centre and railway station. During this process photos of each site were taken and notes made, which were then transcribed onto the database. Other sites identified as having potential for development were also recorded whilst on the site visits.

e) An initial view was taken as to the suitability of each of the sites for development, reflecting matters such as the availability of access to the site, proximity to adjacent properties and whether matters such as overlooking and back to back distances might preclude development, and whether the size of the site might mean that, in reality it would be unable to accommodate new development.

f) Assessments of the development potential of each site were made using a density multiplier. A range of densities were applied, depending on site location, with high densities in more central, urban areas, and lower densities in settlement edges. The densities used reflect a combination of the built form and densities achieved on recent development schemes. A high- and low-density multiplier was applied to each of the identified sites, recognising that, if schemes come forward on the sites, some may come forward at a higher density and some at a lower density. The range allows for this.

g) Those sites with an estimated capacity of fewer than five homes were discounted from the database. These comprise an important source of supply but are difficult to quantify and are commonly allowed for through an allowance for windfall in the housing supply figures in the Local Plan. Removal of these sites avoids double counting with the windfall allowance which may also take account of the opportunities that arise through conversion, sub-division or intensification of the existing development plot.

h) A further review of sites was undertaken to consider policy and environmental constraints. Those sites designated for environmental purposes, or where there is a conflict with wider policy aspirations, were removed from the estimates of potential as being unsuitable sites.

i) The findings of the Council's Whole Plan Viability study were reviewed and applied back to suitable sites identified within the study to determine whether they might be viable for development. A review of recent development and planning applications was also undertaken on a selection of sites similar to those in the UCS to identify if, in reality, such sites are deliverable or if there are any barriers to these.

j) Where sites were considered both suitable and viable landowners were contacted to determine whether the sites were available for development. For some sites this was known through the returns received through the Call for Sites process or through other published information utilised. However, for those additional sites identified through the process of the site visits, the intentions of landowners needed to be sought.

k) The final estimates of capacity and associated site database were refined based on those sites considered suitable, available and deliverable.

Structure of this report

1.11 Following this introductory section the report is presented according to the various stages of work, providing an explanation of the approach followed and a summary of findings. The report sections are:

- Section 2 presents the findings of the initial site identification process and suitability of these.
- Section 3 presents the estimates of capacity of the identified sites deemed suitable.
- Section 4 presents the assessment of the viability and availability of sites.
- Section 5 presents an overall summary of study findings.

1.12 Beyond these sections the report is supported by a series of site schedules (the site database) and mapping, which has been provided to the Council in electronic format.

2. Identifying the capacity

Site identification and desk-based review

2.1 This first stage involved mapping the study area (Figure 1), including the settlement boundary, existing sites and allocations in the emerging Local Plan, as well as sites in the HELAA. Catchment areas around the town centre and railway station were also mapped, based on established walking times and distances (e.g.: 800m or ten-minutes around a town centre and railway station). The catchments were based on the actual street network and thus travel time as opposed to an as the crow flies distance.

2.2 Alongside the mapping, a database of potential sites and opportunities was created. This recorded:

- Sites included in the HELAA, noting those that were considered unsuitable in that, enabling these to be reviewed again through the UCS.
- Sites on the Rugby Brownfield Land Register, including those which have not progressed to an allocation or application.
- Sites identified as having potential for development as presented in the Rugby Regeneration Strategy (2022) which has a focus on the area around Rugby town centre and railway station.

2.3 In addition to the above a project specific 'Call for Sites' was undertaken. This was issued to all contacts on the Borough Council Development Strategy consultation database, including landowners, service providers, developers, agents, community groups and other interest groups. It was also publicised via a press release issued by the Borough Council and further information on the approach, including how to respond, posted on the Borough website. The press release was picked up by and reproduced in a local newspaper.

2.4 The Call for Sites invited respondents to suggest sites for inclusion in the study and included a proforma requesting information on the site to be provided, including information such as size, current use, land ownership, known constraints, availability and development potential. Respondents were also invited to provide any further commentary on any issues associated with the reuse of previously developed land in Rugby and whether these might represent challenges to delivery that need to be overcome. A copy of the Call for Sites and associated proforma, as well as the press release is included in the appendix to this report.

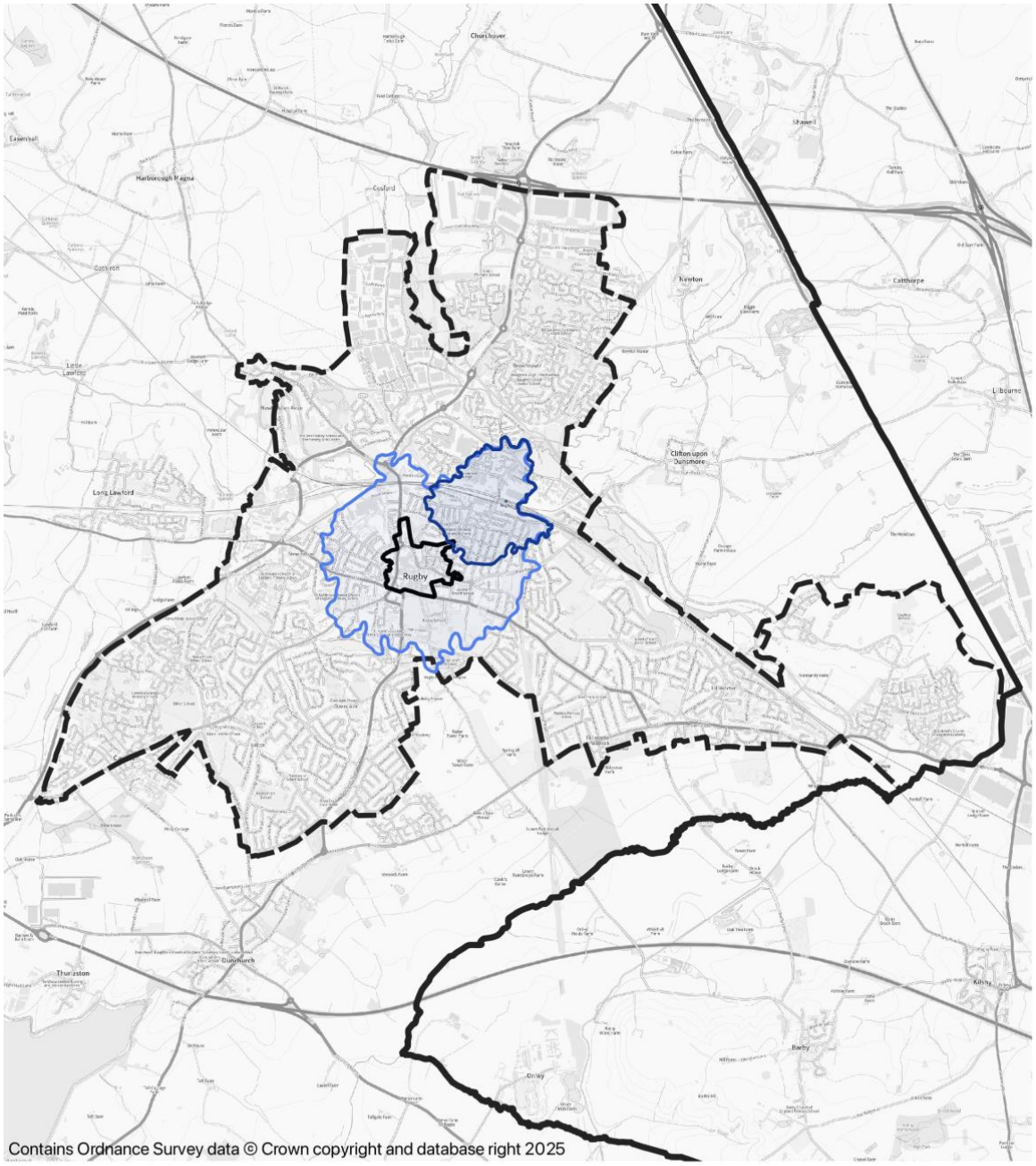

Figure 1: Map of study area (the urban edge) and extent of Rugby town centre, with catchment areas around the town centre and railway station overlaid onto this

2.5 Furthermore, a review of the mapping and associated aerial photography was undertaken to identify potential opportunity areas and sites not already allocated, subject to planning permission, previously assessed through the HELAA, or identified through other means.

2.6 The site identification and desk-based review process was not constrained by a particular size threshold. This allowed for identification of as many sites as possible (albeit acknowledging that some sites may not be of a sufficient size to accommodate development and would eventually be ruled out later in the process).

Initial review of sites

2.7 An initial review of sites was undertaken based on the suitability of that site for development. This sought to rule out sites that would duplicate or double count the HELAA as well as known schemes within the development pipeline.

2.8 This initial stage thus removed those sites that were under construction or recently completed, and thus where there is no further prospect of development in the Plan period. Furthermore, it also ruled out overly complex sites that would require detailed consideration of site masterplanning, phasing and delivery matters. Examples include some of the sites within the Rugby Regeneration Strategy which are very large in scale, occupying whole 'blocks' of the central area, the buildings and streets within them.

2.9 An exception to this is the Rugby Central Shopping Centre. Although identified in the HELAA as having potential for development this has progressed and benefits from planning permission. However, that permission only applies to part of the shopping centre (along the northern arm of the shopping centre). The UCS has thus redrawn the boundary of the site and considers the development potential for the remainder of the shopping centre not benefitting from planning permission (i.e.: the western and southern arms).

2.10 As the approach to the survey work adopted an inclusive approach to site identification and buildings with potential for housing (after taking account of emerging Local Plan allocations and designations) it inevitably resulted in the identification of some sites where the potential for accommodating new housing development would, in reality, be limited. The purpose of the initial review process was to sieve these sites out.

2.11 Reasons for sieving sites out include, for example, limited access to the site, difficult topography, site shape and size, proximity to adjacent development and presence of existing, active uses (except where an alternative use might comprise a more sustainable and suitable use in that location, e.g.: industrial units within the town centre or residential areas). This was ratified through site visits (see below).

Site visits

2.12 Site survey work was undertaken to view and record the sites identified through the desk-based review and Call for Sites process, as well as providing opportunities to identify other potential development sites for consideration.

2.13 The site visits involved:

1. Detailed, forensic surveys on a street-by-street basis of key opportunity areas and sustainable locations, comprising:
    a. The town centre and the catchment areas around this.
    b. The catchment area around train stations
2. A systematic analysis of other areas, including visits to each of the sites identified during the desk-based review of mapping and information together with a general examination of other areas.

2.14 Information for each site was entered into a database, including basic site information such as location and area (measured in hectares). Any additional sites identified through the site visits were mapped and added to the database.

Total sites considered in the UCS

2.15 A total of 127 sites were identified for consideration in the UCS but following the initial review it was noted that 20 sites had been either granted permission for development, formed part of Local Plan allocations or had been accepted in the HELAA. Consequently, it was decided to exclude these 20 sites from further assessment. One exception to this is the Rugby Central Shopping Centre which has been identified in the HELAA as having potential but where part of the site has subsequently been subject to a planning application and permission. The remainder of the site, although technically included in the HELAA, is carried forward in the Urban Capacity Study in recognition of its changing status.

2.16 The remaining sites (107 in total) considered for assessment were identified via the following sources:

- **HELAA Sites:** 42 sites from the HELAA were mapped and included in the initial screening. Of these, 16 were excluded from further assessment as they had already been accepted in the HELAA. The remaining 26 sites were mapped and considered in the study.
- **Brownfield Land Register:** 10 sites from the Brownfield Land Register were initially included, of which 7 were taken forward for further consideration. Of these, 5 overlapped with HELAA sites and 1 was also submitted through the Call for Sites process.

- **Rugby Regeneration Strategy:** 25 sites from the Rugby Regeneration Strategy were considered. Of these, 8 were also listed in the HELAA, and 7 were submitted through the Call for Sites.
- **Call for Sites Submissions:** 48 sites were submitted via the Call for Sites process, with 40 being taken forward for further assessment. Many of the submissions received comprised sites that duplicated with other sources, as outlined above. Notably, 27 of the submissions were entirely new sites and not previously identified in any of the aforementioned sources.
- **Desk-Based Review and Fieldwork:** 43 sites were identified through desk-based research and site visit, with 40 being taken forward for further assessment.

2.17 Following the initial review and site visit process a total of 80 sites were carried forward for further assessment. These are mapped in Figure 2.

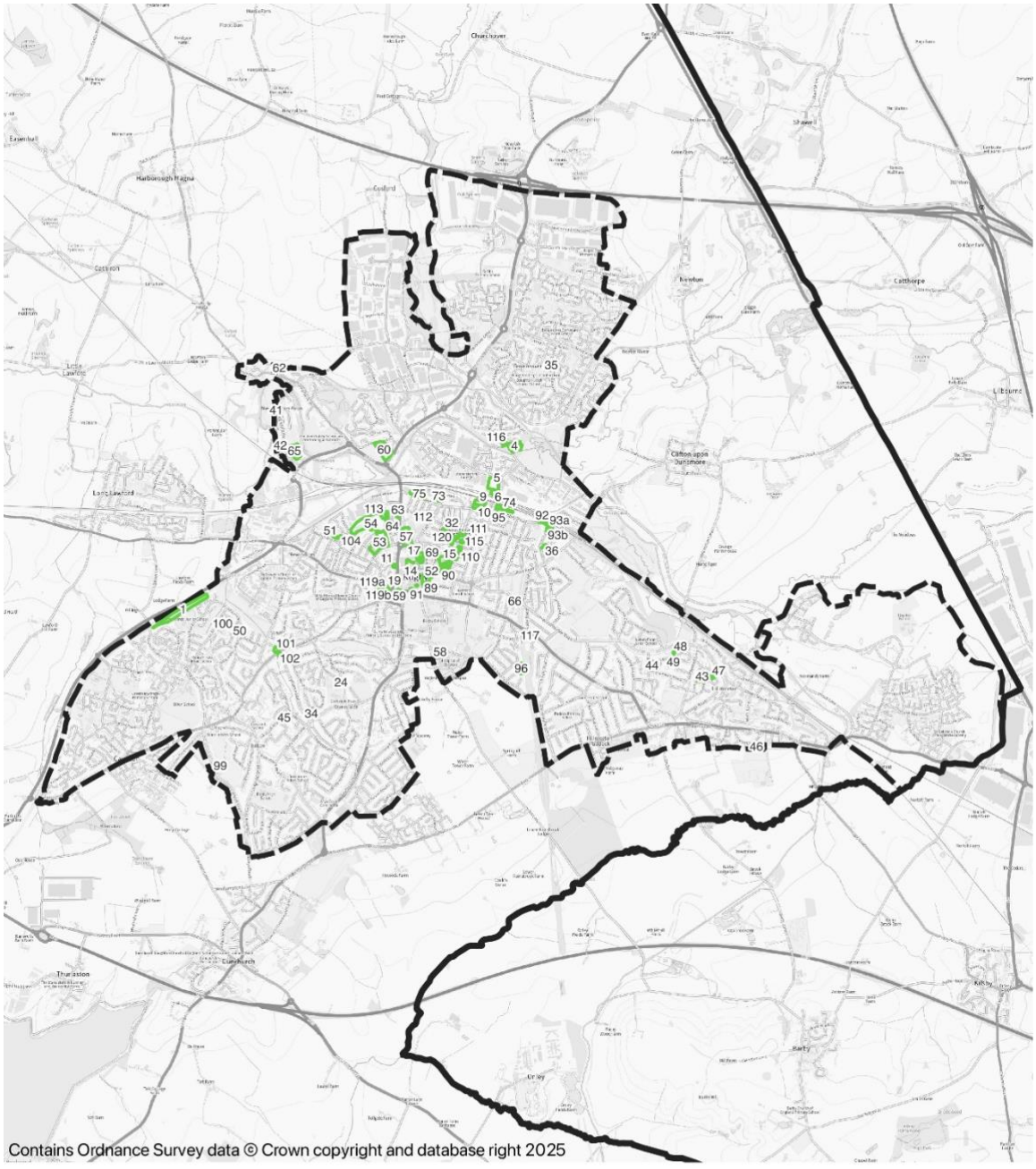

Figure 2: Map of all sites identified in the UCS and considered in the study

3. Capacity estimates

Establishing density multipliers

3.1 The development capacity of identified sites was estimated through application of (1) gross to net ratios to consider the amount of land that might be suitable for housing on any one site, and (2) use of standard density multipliers applicable to the location. The ratios and multipliers used, and the reasons for their use, are outlined below:

Gross to net ratios

3.2 It is important to consider gross to net ratios when estimating site capacity as the whole of a site identified as having potential for development will not always be developable. This is because site constraints and infrastructure requirements need to be factored in and thus reduce the developable area.

3.3 A range of gross to net ratios are used in the UCS to estimate the developable area of each site, to which density multipliers are then applied to estimate site development capacity. As the site area increases, so the need for additional infrastructure is likely to increase, making allowance for increased areas of play space and educational needs for example. The gross to net ratios are based on different site areas. These are reflective of research undertaken and informed by former best practice guidance to urban capacity studies and site capacity assessment[1]. The gross to net ratios used in the UCS are presented in Table 1.

Site area (hectares)	Gross to net ratio used in UCS
Site up to 0.4ha	100%
Site between 0.4ha – 2ha	80%
Site greater than 2ha	60%

Table 1:Gross to net ratios used in UCS to refine the developable area of identified site

3.4 By way of an example, and using the ratios outlined above, a site of 1ha would be reduced in size to 0.8ha. It is this area that density multipliers are then applied to, to estimate site capacity.

[1] See, for example, DETR, December 2000, Tapping the Potential: Assessing Urban Housing Capacity; Towards Better Practice. Similar figures are presented in the more recent Toolkit published by Locality for Neighbourhood Plan groups providing guidance on how to assess and allocate sites for development.

Approach to density

3.5 For the UCS a net density is used to estimate the potential capacity of each of the identified sites considered suitable for residential development through the initial review. The measure of density in this study is referred to as homes per hectare (h/ha). Densities used in the UCS are derived from the following:

Adopted and emerging Local Plan

3.6 The adopted Local Plan (2019) states, in Policy SDC1, that proposals for new development are expected to be of a high-quality and respond to context, including the scale and density of development that characterises the area. It notes that housing densities will be considered on a site-by-site basis. The supporting text states that bringing forward development at the right density is important as new development is expected to harmonise with or enhance the surrounding area.

3.7 The Regulation 18 version of the Local Plan (March 2025) takes a similar approach to the adopted Plan. It does not include a specific policy that establishes density guidance for new development. Rather, Policy D1 supports the creation of well-designed places, stating the development should respond appropriately to context, including the scale and density of existing development.

3.8 The adopted Local Plan does indicate that the density of new development will be monitored and reported through publication of Authority Monitoring Reports (formerly known as Annual Monitoring Reports).

3.9 The 2023 - 2024 Authority Monitoring Report includes a table that broadly shows the density range achieved on completed residential development over an eighteen-year period. This is reproduced in the line graph presented in Figure 3. This indicates that, over time, the average density achieved on new residential development across the borough has fallen. In the early years of the monitoring period a large proportion of homes were delivered at densities in excess of 50 homes per hectare. Over time this has declined, with mid-range density development of between 30 and 50 homes (and less) per hectare now being more common.

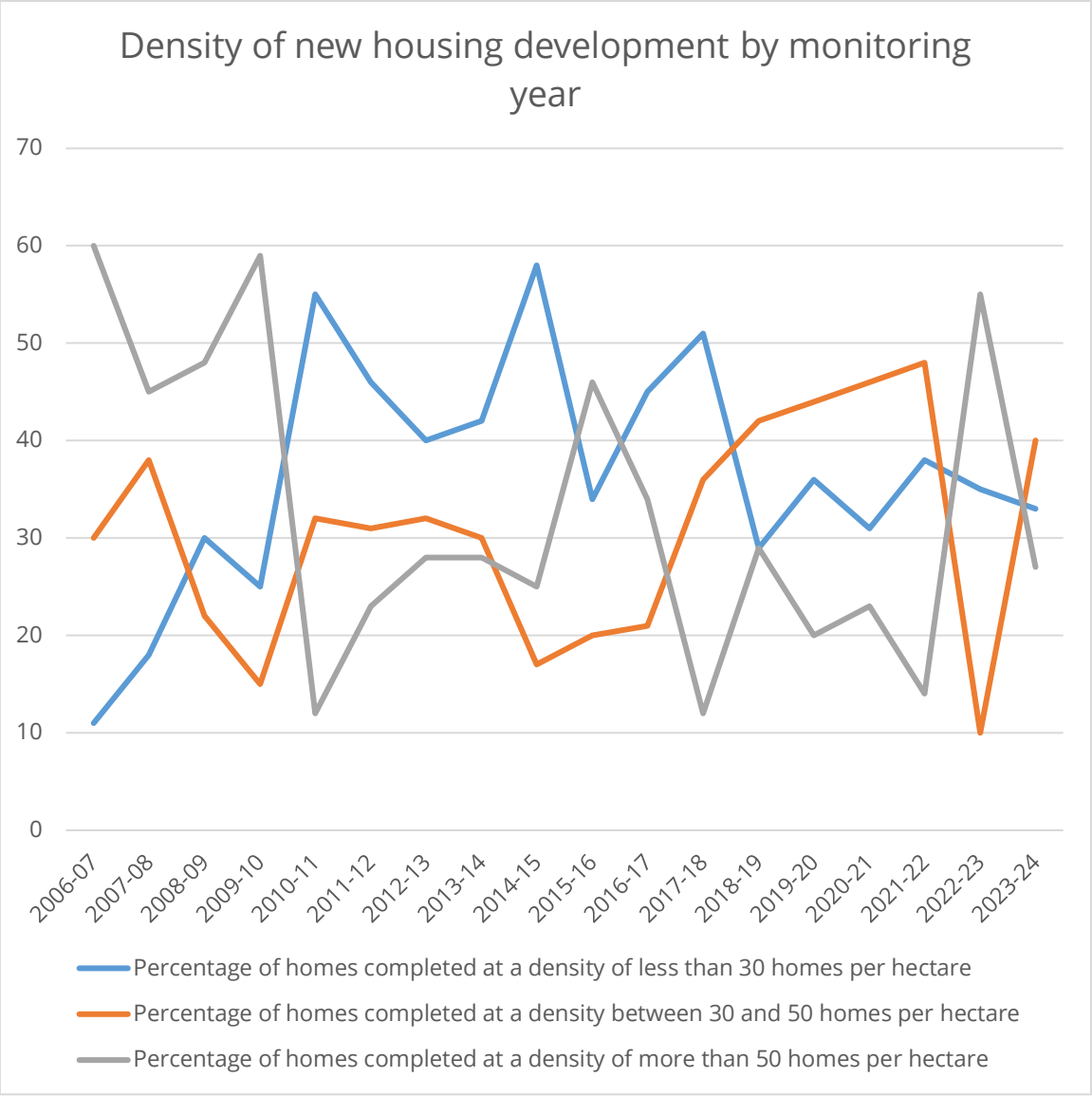

Figure 3: Graph indicating percentage of new homes completed at different densities over the period 2006/07 – 2023/24. Source: Rugby Borough Council AMR 2023-24.

The Rugby HELAA

3.10 The estimates of capacity within the HELAA are based on (a) information provided by respondents to the Call for Sites undertaken as part of that process, (b) information from planning applications, or (c) application of density multipliers. Three density multipliers were utilised in the HELAA and applied to identified sites based on location. They are:

- In rural areas or edge of settlement locations, a net density of 35 homes per hectare.
- Within the urban area, and where a site might be able to accommodate apartment-style development, a density of 100 homes per hectare was used. This multiplier was mainly applied in town centre locations.
- In the wider urban area, and where sites are unable to accommodate apartment style development, a net density of 75 homes per hectare was applied.

Studies of the existing built form

3.11 A series of one-hectare tiles were mapped across Rugby to calculate the density of different residential typologies, reflecting different layouts and periods of development. The tiles mapped are presented in Appendix 2 and indicate that:

- Areas in close proximity to the town centre are typified by smaller development plots comprising primarily terraced and row houses with densities in the region of 50-70 homes per hectare.
- Moving out from the inner parts of Rugby densities begin to decrease. Homes comprise a mix of detached and semi-detached properties with a density in the region of 25-35 homes per hectare. This density range is also common in more recent development towards the edge of the settlement.
- Towards the south and southwest of Rugby are found areas with larger development plots that average around 15-20 homes per hectare. However, there are also some areas with much lower average densities of around 5-10 homes per hectare.

3.12 The assessment summarised above only looked at residential areas and did not consider development within the town centre. This is because of the mixed-use nature of development in the centre and the associated complexity of calculating densities in this area. Instead, a review of planning permissions has been undertaken as set out in the following section.

Review of planning applications

3.13 A review of approved planning applications was undertaken to identify the range of densities coming forward in new development that has been considered acceptable. The focus of this was on the town centre and immediate surrounds, forming a useful supplement to the assessment of hectare tiles outlined above and allowing for consideration of mixed-use type development. The review considered major development schemes approved over the last five years and reveals a wide density range, from schemes of around 40-70 homes per hectare, primarily on the fringes of the town centre, to much higher density schemes in excess of 200 homes per hectare, including the residential apartment blocks adjacent to the railway station and the proposals for demolition and redevelopment of part of the Rugby Central Shopping Centre.

Density range applied in the UCS

3.14 The policy context makes clear that the density of new development should respond to context. The analysis undertaken and summarised above indicates that densities vary across Rugby, relating to location and form of development. Based on this, a density 'matrix' has been prepared (Table 2) that sets out the density ranges applied to sites identified in the UCS depending upon their location. Broadly, higher densities are applied in more sustainable locations where sites are in close proximity to the town centre and railway stations, with lower densities in more suburban locations. A spatial representation of the matrix is presented in Figure 4.

Site location	Low density multiplier (h/ha)	High density multiplier (h/ha)
Within the town centre	100	150
Within the catchment of the town centre and railway station	75	125
Within older, inner urban residential areas	40	70
Within suburban style areas	20	40
Within lower density development areas	5	20

Table 2: Density multipliers applied within the UCS

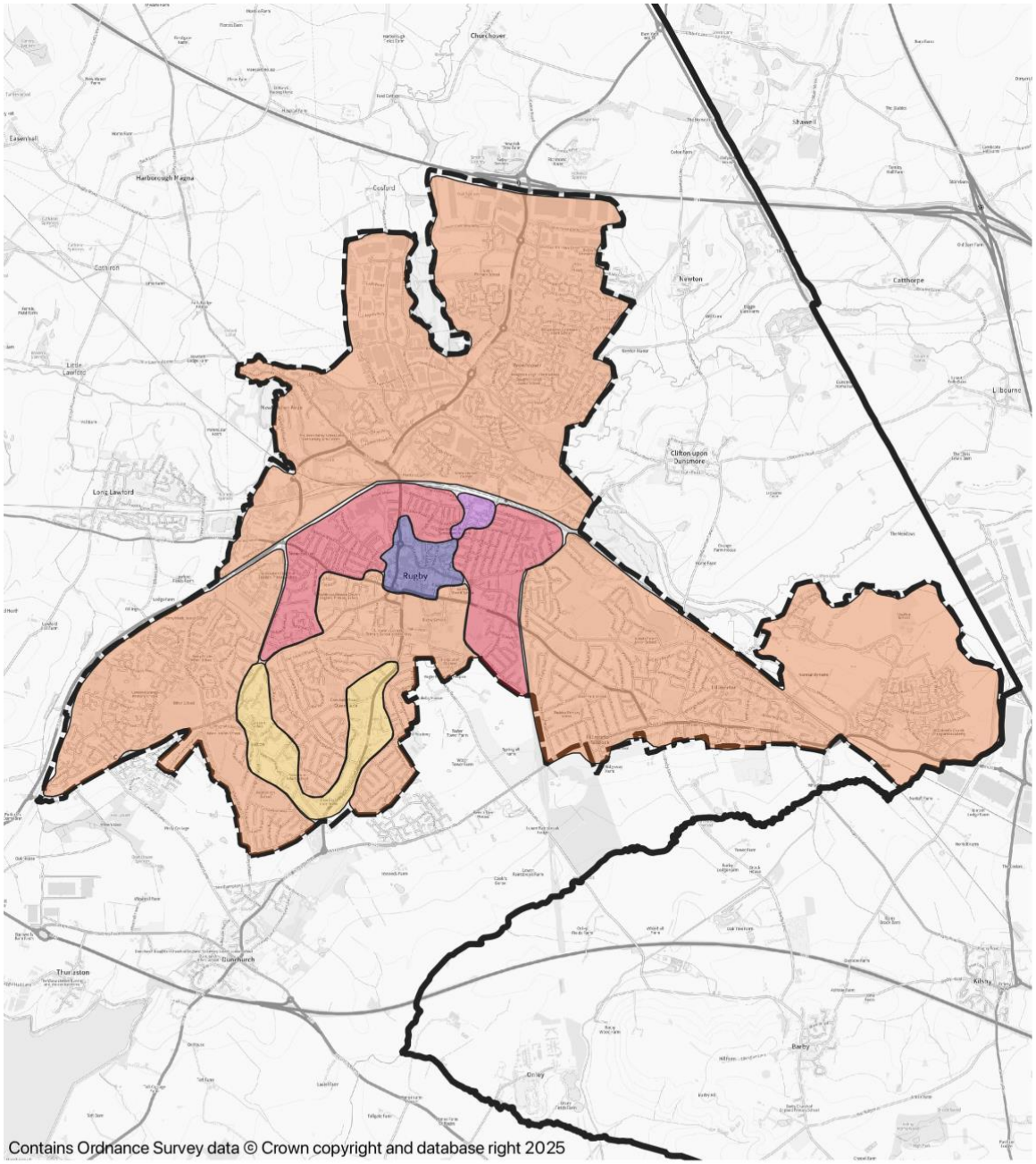

Figure 4: Map showing residential density ranges applied to sites in different areas in Rugby

Applying density multipliers

3.15 The study estimates that potential exists for approximately 1,393 homes (based on a mid-point) on the sites identified within the UCS, as broken down in Table 3 below:

	Number of homes
Estimate of development capacity (number of homes) based on application of low-density multipliers	1,043
Estimate of development capacity (number of homes) based on application of high-density multipliers	1,742
Mid-point estimate of capacity	1,393

Table 3: Estimate of capacity for new homes based on all sites in the UCS considered suitable following the initial screening and review stage

Refining the estimates

3.16 The estimate of capacity presented in Table 3 presents the 'unconstrained' estimate, assuming that all sites identified and considered potentially suitable during the initial review come forward for development. The sites have been considered further in order to refine the estimates, reflecting site size and wider policy matters and designations, as discussed below. The estimates are then considered further in terms of availability and deliverability matters in subsequent sections of the report. These reduce the overall estimates of capacity presented in Table 3.

Small sites

3.17 All sites with a 'mid-point' estimate of capacity of fewer than five homes have been removed from the schedule of identified sites. It is common for the supply of homes in the Local Plan to make an allowance for windfall. These are not always but do typically involve smaller sites, including conversions, sub-division and intensification of existing plots. It is not possible for the UCS to identify all such opportunities and in the interests of avoiding duplication with windfall calculations, small sites have been removed from the estimates of capacity.

3.18 In total, 26 sites were identified in the UCS as having potential for fewer than five homes, accounting for an estimated total capacity of 75 homes based on a mid-point calculation.

Policy considerations and designations

3.19 All sites were reviewed against policy and wider environmental designations to determine their suitability for development. Most sites found to conflict with such designations were removed from the estimates of capacity. Examples of sites removed include those designated for protection and retention of community facilities and open spaces, or where the site is subject to an environmental designation (e.g.: flood risk). Others removed include those where other studies (e.g.: The Regeneration Study) have suggested the site should be retained or is most appropriate for a different use.

3.20 Some community facilities identified were retained as having potential, recognising that they might come forward as part of a mixed-use scheme or where opportunities for rationalisation and consolidation of uses might exist (e.g.: The Town Hall Site). The availability of such sites needs to be considered further.

3.21 Many of the sites identified included currently active uses but which might not be entirely compatible with surrounding residential uses (e.g.: light industrial, car showrooms and repairs etc). In these instances, the sites were considered to have potential, although it is recognised that this might involve a relocation strategy.

3.22 In total, 8 sites were removed from the estimates, reducing the estimate of capacity by a total of 248 homes (based on a mid-point).

Summary of findings

3.23 The headline findings from the calculations presented in this chapter are:

- The 80 sites identified in the study and accepted through the initial review have potential for 1,393 homes, based on a mid-point generated through application of density multipliers appropriate to site location.
- Following further review of the sites identified, 26 were considered to be 'small-sites' based on application of density multipliers and removed to avoid double-counting with windfall estimates in the Local Plan. This reducing the overall estimates of potential by around 75 homes, based, again, on a mid-point.
- Sites subject to policy and environmental designations, and which may affect the suitability of development for residential purposes, were removed from the estimates of capacity. This reduced the overall estimates of potential by around 248 homes based on the mid-point.

3.24 In total, the estimate of potential from identified sites following the review and sifting process outlined above is 1,070 new homes, based on a mid-point. This is broken down in Table 4.

	Total number of sites	Estimate of capacity based on low density multiplier	Estimate of capacity based on high density multiplier	Mid-point estimate of capacity
All sites following initial review	80	1,043	1,742	1,393
Small sites removed from estimates	26	52	98	75
Sites with policy and environmental constraints removed from estimates	8	176	320	248
Remaining sites considered potentially suitable for development	46	815	1,324	1,070

Table 4: Estimates of development potential following site review and suitability process

4. Delivery

Introduction

4.1 This section of the report considers whether the sites considered suitable are deliverable and developable. It does this by considering the viability of development, and whether they are actually available for development.

Viability

4.2 The viability picture of the UCS supply has been built using a range of relevant evidence, including the Local Plan Viability Study, past planning application outcomes, and other supporting material such as information on land values and house sales prices. The purpose of this section is to set out the viability implications of Previously Developed Land (PDL) and to highlight how different housing typologies (flatted schemes, mixed developments, or housing-led schemes) perform in viability terms depending on their size, location and existing use. Through application of the findings of the Viability Study and related evidence, this section provides an overview of how far the identified supply can deliver policy-compliant and financially feasible development.

4.3 The review of the Local Plan Viability Study and, alongside this, relevant planning applications involving previously developed land in the urban area (include applications references R24/0986, R24/0111, R18/1811, R23/0207 and R22/1035) reveal consistent challenges for residential development in the Rugby Urban Area. These challenges are particularly acute in relation to:

- High construction and abnormal costs, especially on previously developed land.
- Market limitations, including constrained sales values and demand for certain typologies.
- Policy compliance costs, such as Biodiversity Net Gain, EV charging, net zero carbon, and accessibility standards.
- Planning obligations, including S106 and CIL contributions, which can significantly impact viability margins.

Viability considerations for Previously Developed Land

4.4 Sites comprising PDL often include existing buildings, an existing active use or some form of infrastructure that give them a relatively high existing use value. However, in the absence of site-specific site assessments, the value of PDL sites cannot be easily ascertained. This matters because the benchmark land value (the minimum value a landowner would expect to sell the land for) is typically calculated by adding

a premium to the existing use value. If the actual existing use value is much higher than initially assumed, then the benchmark land value would also be higher.

4.5 The Local Plan Viability Study mainly focuses on greenfield sites; however, and although it does assess PDL, it restricts this to redevelopment of two land use types, albeit these are tested against a range of housing types (e.g.: flats only, houses only, and a mix of the two). This reduces the scope of application of the study to sites in the UCS but, notwithstanding this, the findings have been applied to the UCS sites in a proportionate manner.

4.6 The Viability Study indicates that the presence of existing buildings, active uses and infrastructure would impact the existing use value, and thus benchmark land value, therefore having implications on viability. Whilst the Viability Study has identified the likely viability of certain residential development typologies and made assumptions based on some existing land uses, certain sites would benefit from further focused technical assessments, to ascertain whether they are viable. These involve, for example, 'one-off' sites and others that do not easily fall within the typologies tested in the Viability Study.

4.7 In general, the redevelopment of PDL sites face a range of challenges, as the demolition, conversion and adaptation costs associated with new developments can adversely affect the viability of schemes.

Implications for viability by site typology and characteristics

4.8 Viability outcomes in the Rugby Urban Area are closely tied to the type of residential development proposed. The Viability Study indicates that flatted developments, particularly those comprising solely of apartments, consistently demonstrate poor viability performance. These schemes struggle to meet affordable housing targets and are often unable to support full compliance with planning policies such as Biodiversity Net Gain, electric vehicle charging infrastructure, and net zero carbon standards. This is especially relevant for smaller or constrained sites, where limited layout flexibility and market demand further undermine financial feasibility.

4.9 In contrast, housing-led developments, particularly those comprising terraced, semi-detached, or detached homes, are generally more viable. These schemes are better positioned to deliver affordable housing (up to 20%) and meet wider policy requirements, especially when located on secondary industrial land. The most viable configuration identified in the Viability Study is a mixed typology of houses and flats, with houses making up approximately 75% of the mix. This balance allows for higher density development while maintaining market appeal and policy compliance, particularly on sites over 1 hectare.

4.10 Site size is another critical factor influencing viability. Very small sites (below 0.16 hectares) have not been tested in the Viability Study, and no firm conclusions can be

drawn but, based on the wider findings of that Study, it can be inferred that given their limited size and constrained layouts that this would potentially result in, means that such sites may face viability challenges unless developed with bespoke, low-to-medium density solutions.

4.11 Medium-sized sites assessed in the Viability Study (0.16–1 hectare) show mixed results. While they can support viable housing-led schemes, medium and higher-density developments (especially those dominated by flats) struggle to deliver net zero carbon and other policy requirements. Larger sites (above 1 hectare) are consistently more viable.

4.12 Existing land use also plays a significant role. The redevelopment of secondary office sites to residential use is generally considered unviable in the Viability Study, with limited capacity to deliver affordable housing or minimum S106 contributions. These sites may only achieve marginal viability, offering between 5–10% affordable housing in best-case scenarios. Secondary industrial land presents more viable opportunities, especially for housing-led schemes. However, flatted development on such land remains problematic and is unlikely to meet policy or financial thresholds.

4.13 Other existing land uses include car parks. Town centre car parks are generally well-located and accessible, making them attractive for residential or mixed-use schemes, and their generally low existing use values (as surface car parks) can often support positive viability outcomes. In general, they are understood to offer viable redevelopment opportunities, particularly where compensatory parking is not required or can be managed through existing infrastructure.

4.14 In summary, and as outlined in Table 5, the viability of residential development in the Rugby Urban Area is highly sensitive to typology, site size, and existing use. Schemes with a mix of housing types, located on larger sites and former industrial land, offer the most promising route to delivering policy-compliant and financially viable development.

4.15 Flatted-only schemes, particularly on small or office-conversion sites, should be approached with caution due to their consistent viability challenges. This is reflected in the form of development that has come forward. For example, where flatted development has taken place in Rugby these have generally formed part of a much larger mixed-use scheme. The development at Railway Terrace, application reference R09/0331/MAJP, granted permission in 2009, is a good example of this, including apartments, a nursing home, hotel, retail space, extra-care sheltered housing, employment uses, and community facilities.

4.16 Furthermore, and in this example, the land was owned by Rugby Borough Council, which partnered with a developer to deliver the project. In this context, the public ownership of the land and the diverse mix of uses (not limited to flats) were key

factors contributing to the scheme's overall viability. Similar arrangements may prove viable in future developments.

Typology	Viability	Affordable Housing	Policy Compliance
Flats only	Poor	0-5% (if any)	Often non-compliant
Houses only	Good	Up to 20%	Generally compliant
Mixed (75% houses, 25% flats)	Best	Up to 20%	Most compliant
Secondary office conversion	Poor	0-10%	Limited compliance
Secondary industrial redevelopment	Good	Up to 20%	Compliant (except flats)
Small Sites (less than 0.16 hectares)	Unknown	Not tested in the Local Plan Viability Study	Not tested in the Local Plan Viability Study

Table 5: Viability and policy compliance capability of new development in the Rugby Urban Area, according to development typology and existing uses. Source: Local Plan Viability Study

Matching the UCS Sites with typologies in the Viability study

4.17 Sites identified in the UCS have been matched to the typologies tested in the Viability study, as indicated in Table 6, linking the location and density assumptions used in the Viability Study with the characteristics of UCS sites. The use of typologies to determine viability at this stage is supported in National Planning Practice Guidance (003 and 004) as it provides a broad, comparative framework, and gives a general indication of viability patterns across different types of sites, while recognising that individual sites may still require further detailed viability testing.

4.18 In terms of applying the findings to the UCS sites the first step was to align the location of identified sites in the UCS with the typology assumptions in the Viability Study. Within the UCS a series of density ranges have been identified, representing different locations. Sites in each of these have been aligned with an equivalent typology in the Viability Study, as shown in Table 6. In short, UCS sites in higher density areas are aligned with the 'flat only' typology in the Viability Study, with

those in lower density areas the 'houses only' typology. Sites in medium density areas are aligned with the mixed typology in the Viability Study.

Densities applied to sites in the UCS based on location	Dwelling mix tested in the Viability Study
Town centre (100–150 h/ha)	Flats (100%)
Town centre and railway station catchments (75–125 h/ha)	Flats (100%)
Older, inner urban residential areas (40–70 h/ha)	Mix of houses (75%) and flats (25%)
Suburban style areas (20–40 h/ha)	Houses (100%)
Lower density areas (5–20 h/ha)	Houses (100%)

Table 6: Correlation of densities (based on location) and dwellings mix, associating typical densities to building/dwelling typologies.

4.19 In addition to typology, sites are categorised by size in the Viability Study. The UCS sites have been matched with these. The size bands used in the Viability Study are 0.16 – 1 hectare, 1 – 2 hectares, and greater than 2 hectares. None of the UCS sites are greater than 2 hectares and so this category has been discounted. However, and although not tested in the Viability Study, many of the sites in the UCS are less than 0.16 hectares in size. This has also therefore been added as a separate category.

4.20 Finally, the current or former use of sites has been factored in. The Viability Study considered only two types of previously developed land: secondary office conversion and secondary industrial redevelopment. To capture a fuller picture, two further categories have been added to this: a car park use category and an "other" category comprising sites that do not easily fall into any of these, such as retail use, empty plots, vacant land, and garages.

4.21 By combining these dimensions: location/density, housing typology, site size, and existing use, a matrix has been created. UCS sites (considered potentially suitable for residential development) have been mapped to the matrix according to their characteristics (Table 7).

			Site Area and Site Type											
			Less than 0.16 ha				Between 0.16 - 1 ha				Greater than 1 ha			
	UCS site densities / location	Viability study typologies	Secondary office conversion	Secondary industrial redevelopment	Car parks	Other	Secondary office conversion	Secondary industrial redevelopment	Car parks	Other	Secondary office conversion	Secondary industrial redevelopment	Car parks	Other
Typologies	Town centre, 100-150 h/ha	Flats (100%)	83	120	88, 89	25, 37, 69, 91, 118	-	-	11, 17, 87, 90	14, 52	-	-	-	57
	Town centre and railway station catchment areas, 75-125 h/ha	Flats (100%)	-	111, 115	-	55	-	9, 10, 114	-	-	-	-	-	-
	Older, inner urban residential areas, 40-70 h/ha	Houses (75%) Flats (25%)	-	95, 93a, 93b, 122	-	36, 51, 121, 125	-	92, 113	74	66, 73, 96, 103	-	54	-	53
	Suburban style areas, 20-40 h/ha	Houses (100%)	-	-	-	-	6	-	-	43, 49, 50, 58	-	-	5	-
	Lower density areas, 5-20 h/ha	Houses (100%)	-	-	-		-	-	-	-	-	-	-	-

Table 7: Matrix showing UCS sites in the context of the assumptions of the viability evidence.

Application of viability findings

4.22 Key findings from the application of the Viability Study to sites in the UCS are summarised below:

- In the Town Centre area, where densities of 100–150 homes per hectare (h/ha) are expected, most opportunities are found on very small sites and those below 1 hectare in area. These typically comprise car parks and "other" sites, or existing buildings suitable for redevelopment/conversion. The viability study indicates that flatted schemes (as assumed by the higher densities applied to the UCS sites in this area) and small sites are less viable than others. However, within the town centre, some of the sites are adjacent to each other and, subject to land assembly and coordinated delivery, could come forward as part of a larger development opportunity, which might improve viability prospects.

- This means that while Town Centre intensification might be technically achievable, delivery is likely to be constrained, potentially being more viable where part of wider mixed-use schemes or where public sector land assembly can offset viability pressures. Further site-specific assessments may help determine whether sites are or could become viable for development.

- Sites within the Railway Station catchment density area in the UCS a similar pattern emerges to those in the town centre: the sites identified are small (again under 1 hectare) but linked to high-density flat typologies.

- The older inner urban neighbourhoods area in the UCS present the most diverse picture. Here, sites span smaller sites and larger areas in excess of 1 hectare, with associated densities of 40–70 h/ha which could deliver a mix of houses and flats. This range reflects greater flexibility in land use, as opportunities include both conversions of smaller industrial plots and redevelopment of larger parcels. There is also a variety of "other" existing uses, including retail, vacant garages, MOT sites and car parks etc. These types of areas often act as a 'transitional zone' in towns and cities, where more organic change has come forward over time and where further opportunities to accommodate growth may present themselves in comparison, to say, constrained town centre sites, or lower density suburban style development.

- At the edge of Rugby, sites identified in the UCS are generally larger than 0.16 ha. These predominantly comprise industrial redevelopment (MOT garage) and vacant residential garages, albeit there is a single site in existing office use and thus with higher benchmark value, which could have an impact on viability and would need further investigation.

4.23 The Viability Study has been applied as far as reasonably practicable; however, where individual PDL sites come forward, particularly those falling within typologies

not tested in the Viability Study, further analysis would be beneficial. In such cases, the preparation of a site-specific viability assessment would provide a more robust basis for decision-making.

4.24 The evidence demonstrates that viability in the Rugby Urban Area is highly sensitive to a combination of site size, existing use, and housing typology. Flatted-only schemes, expected in central locations (based on UCS densities in the Town Centre and the Railway catchment areas), consistently underperform in viability terms and struggle to deliver affordable housing or wider policy requirements. These schemes may still contribute to capacity but are most likely to come forward as part of larger mixed-use developments, or where land is publicly owned and assembly can offset viability pressures. By way of an example, public car parks and garages owned by RBC present an excellent opportunity for viable development in publicly owned land. In addition, sites such as the existing bus depot at Railway Terrace or small Town Centre car parks adjacent to each other and other private sites (such as the Railway Terrace Car Park and surrounding UCS sites) represent a good opportunity for amalgamation and coordination for redevelopment.

4.25 By contrast, mixed housing typology schemes, particularly those on secondary industrial land and on sites over 1 hectare, present the strongest prospects for policy-compliant delivery. These configurations offer the most reliable pathway for delivering affordable housing alongside other planning obligations.

4.26 The analysis also underlines the importance of site size. While medium-sized sites (0.16 ha – 1 ha) can support housing-led development, they show mixed outcomes when dominated by flats. Larger sites consistently demonstrate greater potential to deliver viable schemes, whereas very small sites remain untested and are likely to face challenges without bespoke solutions. Car parks perhaps offer the most viable pathway to deliver housing in the Town Centre.

The housing market

4.27 The Local Plan Viability Study reports that average sales values, for all property types, have increased since 2015 (Figure 5), and that this pattern is expected to continue. The Study notes that, between 2025 and 2029, house prices in Rugby are expected to grow steadily, with cumulative increases projected at 26.4% over the five-year period. This forecast anticipates annual growth rates starting at 4.5% in 2025, peaking at 6% in 2026 and 2027, and gradually tapering to 3% by 2029. The sales values increase especially for new build, which also have a higher market value.

4.28 The expected higher sales values would likely have positive impacts on viability, as higher sale values increase the gross development value of schemes, which offsets construction costs, policy compliance costs (e.g. Biodiversity Net Gain, EV charging, net zero carbon), and planning obligations (e.g. S106/CIL).

4.29 This means that schemes which are currently marginal could become more deliverable in the future if sales values rise as projected. However, the Viability Study also highlights that rising construction costs and policy requirements may erode some of these gains, meaning the uplift in sales values is positive but not a complete solution to the viability challenges that are identified below. The impact of inflation on house prices also needs considering, which may indicate that, in real terms, prices are lower than simple extrapolation suggests.

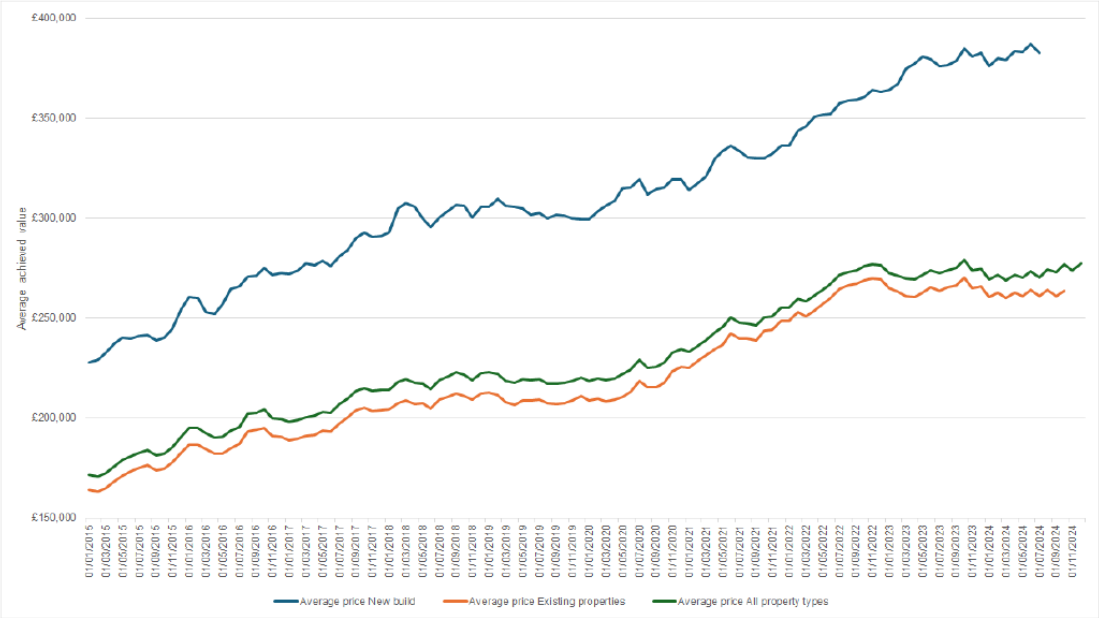

Figure 5: Chart showing average sales value in Rugby (2015 – 2024), and which are expected to continue to increase. Source: Local Plan Viability Study (March 2025)

4.30 The picture outlined above applies to the Borough as a whole. There are variations across this which need to be taken into account, with the Viability Study indicating that the town of Rugby itself is the lowest value area for property sales in the Borough, with higher values observed in the surrounding rural areas (Figure 6). This means that while rural locations may generate stronger financial returns, development in the Rugby Urban Area would likely operate on tighter margins. This suggests that viability is more challenging in the urban context, and that policy-compliant delivery in the Rugby Urban Area is more dependent on securing the right mix of housing type, location, and existing land uses (benchmark land value). Mapping of Land Registry Paid Price Data against house size information presented within EPC certificates shows how values vary by square metre across the Rugby Urban Area (Figure 7). This variation has implications for viability.

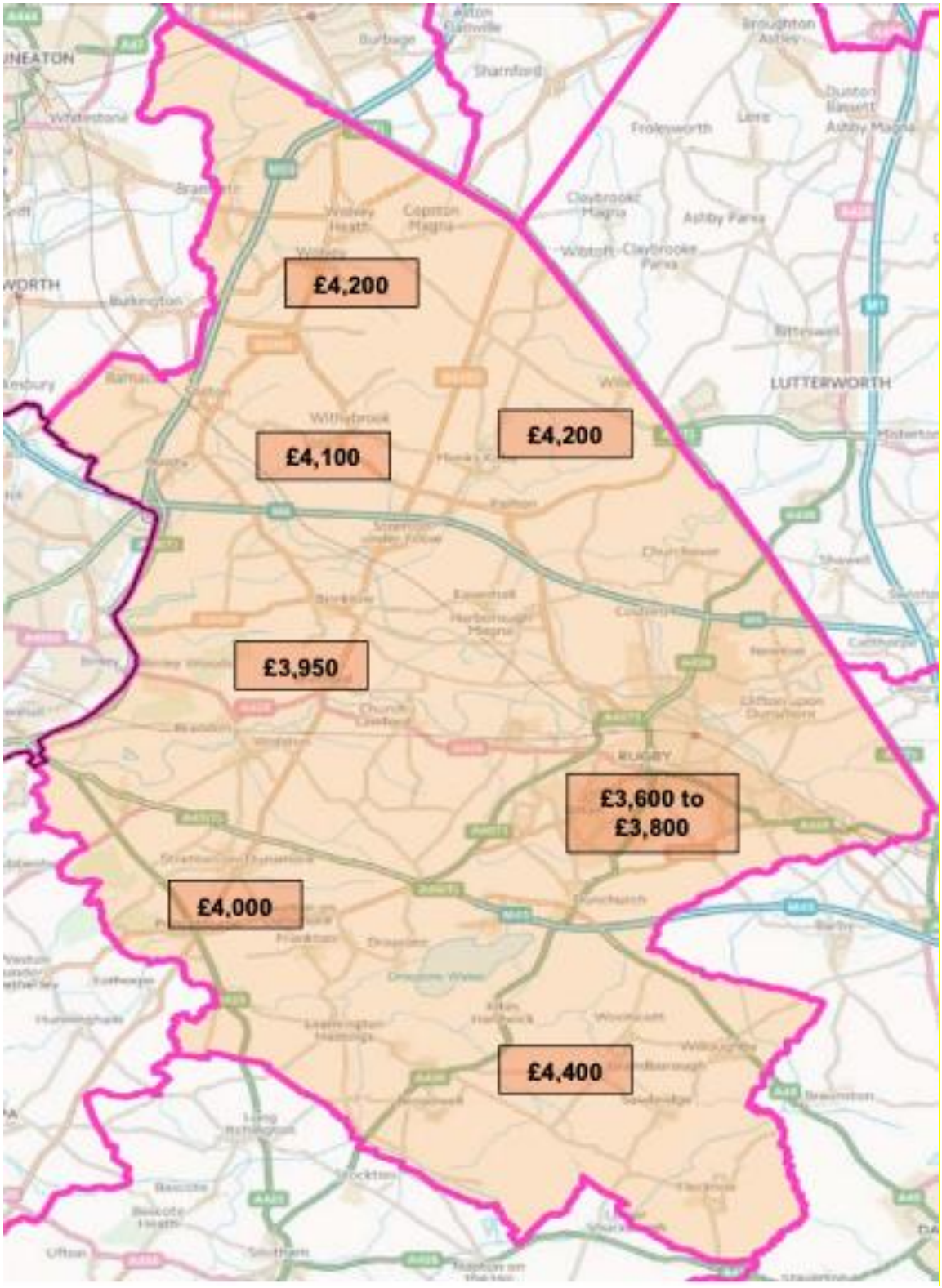

Figure 6: Sales values in Rugby Borough (£ per square metre). Source: Local Plan Viability Study (March 2025)

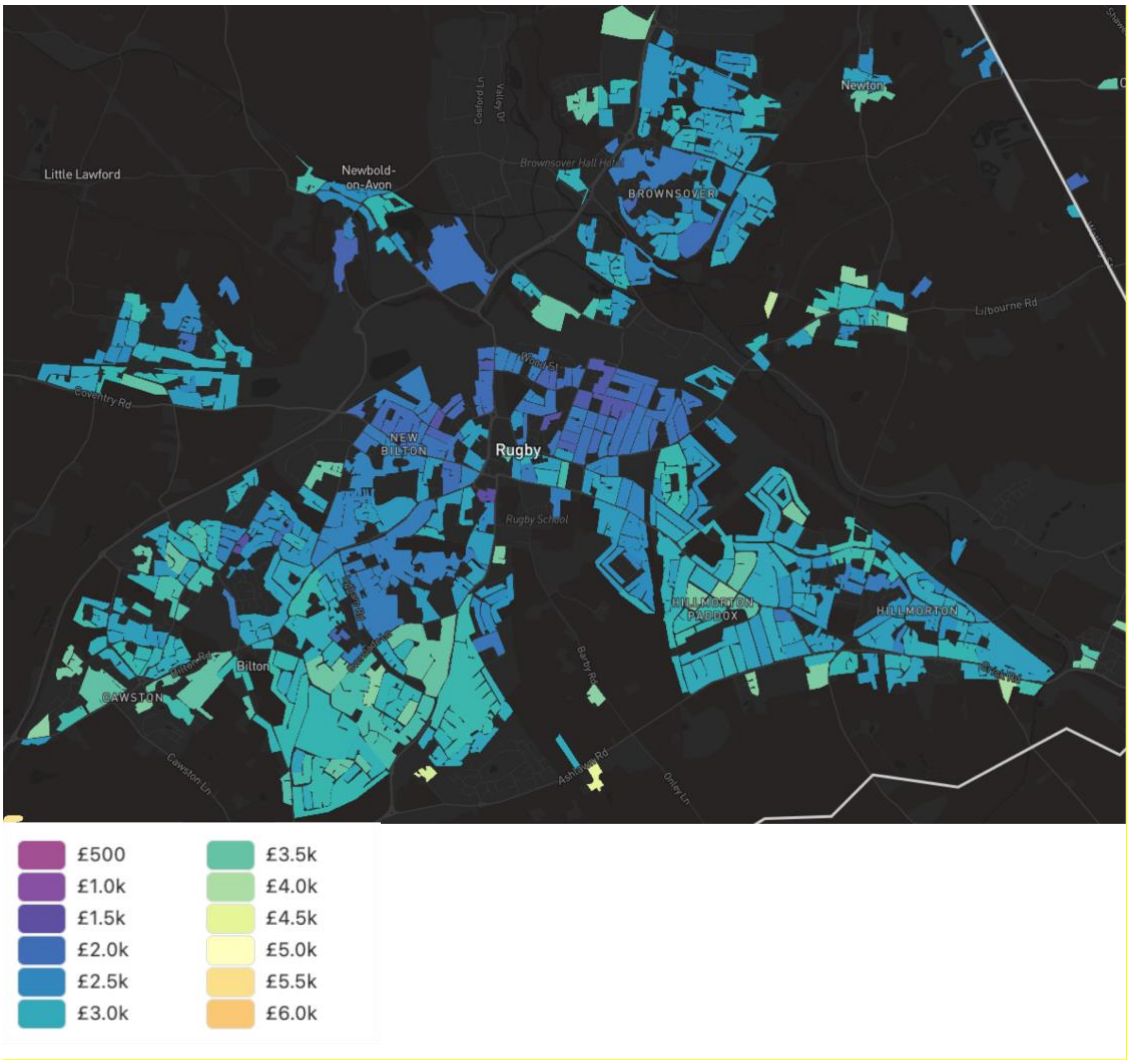

Figure 7: Sales values in the Rugby Urban Area (£ per square metre). Source: housemetric.co.uk

4.31 Applying information on value areas to the broad density areas identified within the UCS (and thus individual sites within those) indicates that:

- Within the town centre there is insufficient evidence of residential sales values to establish a reliable pattern, as much of the stock is in non-residential use. This highlights the difficulty of benchmarking viability in the town centre and reinforces the need for site-specific assessments where UCS sites involve conversions or redevelopments in these locations.

- The lowest sales values are associated with the Railway Station catchment area, where densities are higher (75–125 h/ha) and flatted typologies dominate. This creates a compounding challenge: schemes here are both typologically less viable (as flatted schemes already struggle to deliver affordable housing and meet wider policy requirements) and located in areas of relatively low sales value. Such sites may therefore only be deliverable in exceptional circumstances, for example where public sector land ownership, coordinated

land assembly, or integration into wider mixed-use schemes can help improve financial outcomes.

- The older inner urban neighbourhoods present a mixed picture. Sales values here vary significantly, ranging from low to high depending on the precise location. This reflects the transitional character of these areas, where some neighbourhoods can command stronger values while others remain more marginal. For UCS purposes, this suggests that viability is likely to be highly site-specific in these locations, with larger mixed schemes and redevelopment of secondary industrial land most likely to achieve deliverability.
- The highest sales values are recorded in the Suburban Style Areas, where densities are typically lower (20–40 h/ha) and housing-led development predominates. This suggests that sites in suburban locations within the UCS supply are the most likely to sustain viable housing delivery, particularly where they are larger in scale and located on secondary industrial land or other low-value existing uses.

Availability

4.32 When undertaking an assessment of land for housing development, Planning Practice Guidance says that consideration should be given to the likelihood of development coming forward. This relates to the achievability of development (based on viability matters, as outlined above), and the availability of land for development.

4.33 The guidance explains that a site can be considered available when:

"...on the best information available (confirmed by the call for sites and information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available."

4.34 For the purposes of this UCS, assessment of the availability of individual sites has drawn upon:

- Information provided through submissions to the Call for Sites exercise.
- Knowledge of current and previous site promotion activity.
- Information contained within the RBC HELAA and Brownfield Land Register, as well as other sources of material, such as the Rugby Regeneration Strategy.
- Correspondence with the landowner to specifically ask whether the site is available (specifically where the site may have been identified by a third party or through desk-top analysis and site visits).

4.35 Based upon this, the study considers that 20 sites are viable and available. These have a mid-point capacity estimate of 684 homes. This is further broken down in Table 8 and which indicates, based on the information available, that:

- 14 of the sites are viable and available for development in the Plan period. These have capacity for around 475 homes (based on a mid-point estimate).
- A further six sites are also potentially viable and available, but that these might comprise longer term opportunities, either towards the end of the current Plan period or into the next. These have capacity for around 209 homes.
- Eight sites have been confirmed as being unavailable for development. These comprise mainly small/medium assets in ongoing viable use (including several public and private car parks, a bank, and part of a healthcare facility), and where, there is no reasonable prospect of these being developed.
- The availability of 14 sites is unknown, with landowners providing no information to confirm whether the site is available for development or not. These may represent a potential source of windfall over the Plan period but cannot be relied upon in the supply of land for housing.

4.36 Spatially, the Town Centre (six sites) and the older, inner urban areas (eight sites) accommodate most of the suitable, viable and available capacity, with three further sites in the Town Centre/railway station catchments and three in suburban areas. This pattern implies predominantly medium- to high-density outcomes, typically flatted or mixed (flats and houses) schemes responding to local context.

	Total number of sites	Estimate of capacity based on low density multiplier	Estimate of capacity based on high density multiplier	Mid-point estimate of capacity
Sites both viable and available	14	356	560	475
Sites potentially viable and available	6	155	265	209
Sites where availability is unknown	14	111	189	150
Sites unavailable	8	121	191	157

Table 8: Estimates of development potential based on viability and availability of sites considered suitable for development in the UCS

5. Summary

Overview of findings

5.1 Through the UCS 127 sites were identified. Following the initial review process this was reduced to a total of 80. Application of density multipliers to these resulted in an estimate of capacity between 1,043 and 1,742 homes, or a mid-point of 1,393 homes.

5.2 Small sites (those yielding less than five homes) were discounted to avoid double counting with the Borough's approach to windfall. This reduced the number of potential development sites to a total of 54, with a capacity of between 988 and 1,643 homes, equating to a mid-point of 1,316 homes.

5.3 A further review of the sites removed those where policy and or environmental designations impact upon their suitability. Consideration was also given to the potential delivery of sites, grouping them based on common typologies and applying the findings established in the Borough Council Local Plan Viability Study. This reduced the overall number of sites to 42, with an estimated capacity of between 743 and 1,205 homes, or a mid-point of 991 homes.

5.4 The delivery intentions of landowners were then considered. Some of this was known as a result of the Call for Sites process and other supplied information. For those sites identified through the work (e.g.: via the desk-based review or site visits) or submitted by third parties via the Call for Sites process, landowners were contacted to ask whether sites might be available for development in the Plan period.

5.5 This process reduced the number of potential development sites to a total of 20, with a capacity of between 511 and 825 homes, equating to a mid-point of 684 homes (Figure 8). Of these, 14 sites are considered viable and available, and have a mid-point capacity estimate of 475 homes. A further 6 sites, with a mid-point capacity of 209 homes, may also potentially be viable and available for development, although these may be longer-term opportunities.

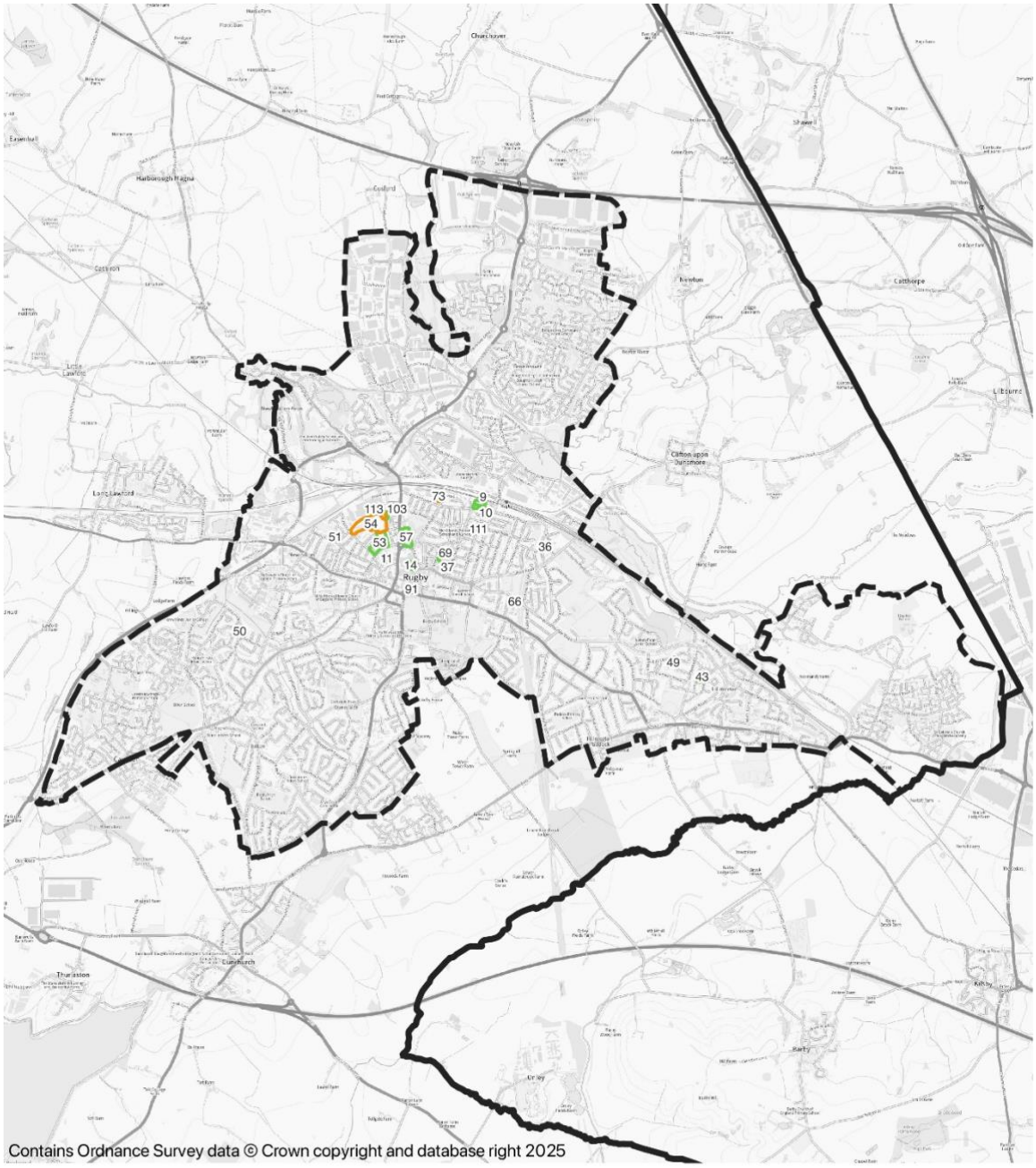

Figure 8: Map showing sites in the UCS that are suitable, viable and available

Summary of individual sites

5.6 Those sites which are suitable, viable and available are summarised below. They have potential to accommodate 475 homes (based on a mid-point estimate of capacity).

Stagecoach Depot, Railway Terrace, Rugby (site 9 – see the site database)

5.7 Viable and available, subject to remediation of possible contamination and operator relocation, offering the opportunity to be developed in conjunction with site 10. Has potential for 40 homes.

Stagecoach Depot car park, Railway Terrace, Rugby (site 10)

5.8 Viable and available, subject to remediation of possible contamination and operator relocation, offering the opportunity to be developed in conjunction with site 9. Has potential for 32 homes.

Westway Car Park, Rugby (site 11)

5.9 Viable and available site owned by RBC, subject to remediation of possible contamination, surface flood risk mitigation and conservation area considerations. It offers opportunities to improve pedestrian permeability. Has potential for 38 homes.

Rugby Central Shopping Centre, Rugby (site 14)

5.10 Viable and available site (excluding the multi-storey car park and that part of the shopping centre already benefitting from planning permission) subject to listed building constraints and conservation area considerations. Most likely available in years 6 to 10 year of the Plan period. Has potential for 65 homes, although this could increase should higher density multipliers be applied to the site in line with the densities achieved on that part benefitting from planning permission.

42 - 54 Winfield Street, Rugby (site 36)

5.11 Viable and available, subject to highway/access works, arboricultural considerations and being designed sensitively to respect neighbour amenity. Has potential for 8 homes.

Garages to the rear of 12-34 Jackson Road, Hillmorton (site 43)

5.12 Viable and available site in public ownership, benefiting from two access points albeit these are subject to the retention of access to the rear of neighbouring properties and the need to respect back-to-back distances with adjacent properties. Has potential for 9 homes.

Former Garages to the rear of 1-11 Perkins Grove (site 49)

5.13 Viable and available site owned by RBC but with topographical constraints that could increase the costs of development and impact capacity/typology of housing provided. Has potential for 6 homes.

Land to the rear of 9-23 Freemantle Road (Blackwood Avenue) (site 50)

5.14 Viable and available site, owned by RBC, with multiple access points for vehicles and pedestrians, subject to respecting back-to-back distances. Has potential for 5 homes.

Land to the rear of 34 Avenue Road (site 51)

5.15 Viable and available site owned by RBC that offers opportunities to improve the relationship with the built environment and the existing allotment space. Has potential for 6 homes)

Rounds Gardens, Rugby (site 53)

5.16 Viable and available site owned by RBC with significant development capacity, subject to surface water flood risk mitigation and consideration of existing trees. Has potential for 75 homes.

Town Hall (site 57)

5.17 Viable site, owned by RBC and available in the longer term, subject to government reorganisation. The site has capacity for a significant residential development subject to the conservation and adaptation of existing historic buildings (including listed buildings) which could have costs implications. Has potential for 157 homes, subject to the mix of uses to be provided on site.

Lower Hillmorton Road (site 66)

5.18 Viable and available site, subject to highway/access works and consideration of the impact on the adjoining Local Wildlife Site. Has potential for 10 homes.

Land Rear of 30, Albert Street (site 69)

5.19 Viable and available site in a sustainable location, subject to conservation area considerations. Has potential for 5 homes.

Land West of Princess Street (site 103)

5.20 Viable and available site with opportunities for improving pedestrian permeability in the area and which could be jointly developed with sites 54 and 113 (see below). Has potential for 9 homes.

5.21 Those sites which are suitable, and potentially viable and available are summarised below. They have potential to accommodate 223 homes (based on a mid-point estimate of capacity).

Land Adjacent to 9 Railway Terrace, Rugby (site 37)

5.22 Potentially viable and available site, in a sustainable location with opportunities to repair urban grain and improve street scene. It is subject to replacement parking and highway/access works. Has potential for 15 homes.

Former GEC Site, Rugby (site 54)

5.23 Potentially viable site subject to remediation of land contamination, provision of suitable access arrangements, and consideration of existing trees and surface water flood risk mitigation, all of which could affect capacity and costs. It could potentially be developed jointly with sites 64, 103 and 113. Site is available and has potential for 151 homes.

NHS Railings, The Railings (site 73)

5.24 Potentially viable and available site with opportunities to improve pedestrian permeability and make reuse of existing buildings. Would be subject to further viability assessments which would need to account for half of the site being retained in its current use, with the other half potentially becoming available for development. Has potential for 11 homes.

28 & 29 High Street (site 91)

5.25 Potentially viable and available site which may involve the reuse of existing buildings, subject to the retention of ground floor Town centre uses, conservation area and shopping area and frontage considerations. Has potential for 13 homes.

Car Wash adjacent to 44 Craven Road (site 111)

5.26 Potentially viable and available site in a sustainable location with opportunities for improving the urban grain and street scene, subject to access arrangements and further consideration of viability. Has potential for 5 homes.

Land south of Cooling Tower (site 113)

5.27 Potentially viable and available site subject to remediation of land contamination and provision of suitable access. Could potentially be jointly developed with sites 54 and 113. Has potential for 14 homes.

Concluding comments

5.28 The UCS has identified that 20 sites are suitable, viable (or potentially/likely viable) and available for development, with a mid-point capacity of 684 homes.

5.29 Spatially, the Town Centre (six sites) and the older, inner urban residential areas (eight sites) offer most of the suitable-viable-available capacity, supplemented by three sites within the town centre/railway station catchment area and three sites in suburban areas.

5.30 A relatively small number of larger and higher-capacity sites contribute significantly to the overall estimate of development potential. These include the Rugby Central Shopping Centre (that part not subject to planning permission), the former GEC site, the Town Hall site, Rounds Gardens, the Westway car park and the Stagecoach site.

5.31 The large nature of many of these sites means they are not without complexity, and where the Council may have a role to play in helping to bring these forward. That may take various forms, including masterplanning, supporting the assembly of land and remediation, and taking a town-centre wide view of parking provision. Such interventions could help de-risk delivery, secure policy outcomes, and improve viability headroom.

5.32 The UCS is expressly additional to the HELAA: sites already identified and accepted in the HELAA were removed from further UCS assessment to avoid double-counting, as the UCS is not seeking to identify capacity already known about. Rugby Central is an exception to this approach. Although accepted in the HELAA and now the subject of a recent planning permission, the UCS has amended the site boundary to assess only the remaining parts of Rugby Central not covered by the permission, excluding the multi-storey car park, and thereby clarifies what (if anything) remains as new capacity beyond the consented scheme. This exception is justified by the recent permission and ensures the UCS provides an up-to-date view of residual urban capacity alongside HELAA findings.

5.33 Overall, the UCS demonstrates that a meaningful brownfield-led contribution exists within Rugby's urban area, albeit this supply is highly sensitive to typology, abnormal costs and site size.

Appendix A: Call for Sites

This appendix includes a copy of the Press release issued to publicise the 'Call for Sites' and information issued to contacts on the Rugby Borough Council database as appearing on the Council website in June and July 2025. It also includes a copy of the proforma that respondents were requested to complete and return with their submissions.

Additional call for development sites in Rugby town

RUGBY Borough Council has issued a second Call for Urban Sites, requesting any developers and interested parties to submit details of sites in the Rugby town area with potential for housing development.

27 June 2025 | News

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The call follows a previous call for sites held from November 2023 to February 2024 and further work carried out by the council to identify urban sites for development before the Local Plan Preferred Options consultation held earlier this year. In a changing property market, the call aims to ensure that the council has a 'belt and braces approach' with the most up-to-date information available to determine the capacity of the urban area to accommodate housing development, by reusing previously developed land and making better use of existing land and buildings.

Sites submitted to Troy Planning and Design – the organisation the council has commissioned to prepare an Urban Capacity Study on its behalf – will be assessed for their potential to be redeveloped successfully within the emerging local plan period, alongside other sites that have previously been considered. It is hoped that the company will be able to identify more developable brownfield sites whose development will offset the need for greenfield development.

Anyone interested in suggesting a potential urban development site is asked to complete a form available on the council's website. They are asked to provide information on the site location, size, current use, and ownership along with details about site access, deliverability and constraints to development.

Cllr Louise Robinson, Rugby Borough Council portfolio holder for Growth, Investment, Digital and Communications, said: "The recent emerging local plan consultation highlighted that the scale of development needed over the next twenty years will require some housing outside of the urban area. However, we want to limit the amount of new housing in rural or village areas as much as we can, and that's why we're taking this exceptional step of doing a second sweep of brownfield sites to do everything we can to identify and include potentially developable sites in Rugby town.

"This new Urban Capacity Study will give us robust and up-to-date evidence on the potential for housing on brownfield and previously used sites in the Rugby town area. Key within this is engagement with land and building owners.

"Landowner's or agent's circumstances may have changed since the last Call for Sites so I would urge any landowner or agent with a potential site that could be developed for housing to submit the relevant details."

For more information on the Urban Capacity Study and Call for Urban Sites see https://www.rugby.gov.uk/w/call-for-urban-sites.

The Call for Urban Sites closes on Friday 18 July 2025.

Call for Urban Sites

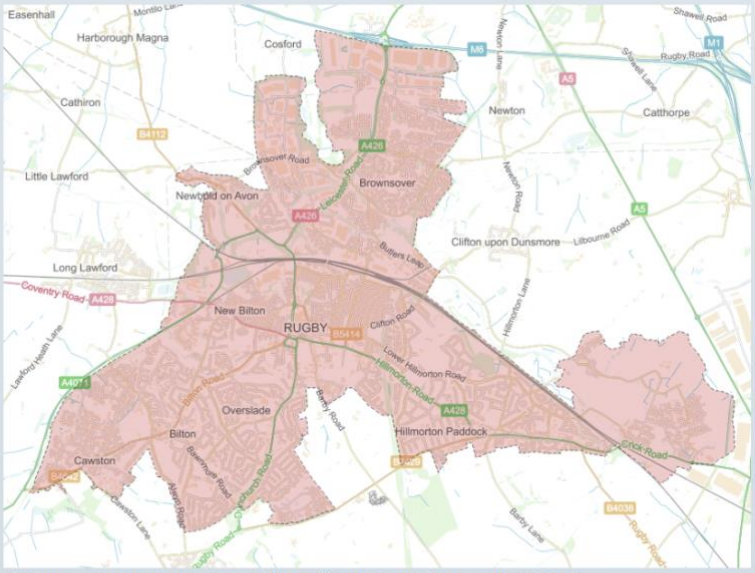
Deadline Friday 18 July

Consultants Troy Planning + Design have been commissioned by Rugby Borough Council to prepare an Urban Capacity Study (UCS).

The purpose of this study is to assess the potential for the urban area of Rugby town to accommodate new housing development by reusing previously developed land and making better use of existing land and buildings. The work will help inform emerging policy decisions in the new Local Plan. It will supplement the Housing and Economic Land Availability Assessment (HELAA) and may reconsider sites submitted through that process but not considered suitable for development within it.

To support this study, and ensure that opportunities for development within the urban area have been thoroughly explored, we are now making a Call for Urban Sites.

Responses should identify and suggest any land and buildings which you consider to have the potential for residential development within the existing built up area of Rugby town, as shown in the image below (and in greater detail in this map). Sites outside of this area will not be considered as part of this process.



Should you wish to make a comment or submit a site for consideration, please complete the proforma and return it to info@troyplanning.com by no later than **Friday 18 July 2025**.

This invitation is made without prejudice to the objectives of either party: at this stage it is not possible to foresee the outcome of the study or the emerging Local Plan, nor does it prejudice any decision the council may wish to take should an application for any site be forthcoming.

Rugby Borough Council Urban Capacity Study

Site Opportunities Proforma

- Please complete this form to suggest any land or buildings which you consider to have the potential for residential development within the existing built up area of Rugby town over the new Local Plan period (up to 2045).
- The sites will be assessed as part of an Urban Capacity Study undertaken by Troy Hayes Planning Limited on behalf of Rugby Borough Council to help inform the Local Plan preparation process.
- Please complete a separate form for each site. Complete each section clearly and legibly to the best of your knowledge. If you require more space, please append additional pages.
- Completed forms should be returned by email to info@troyplanning.com no later than **18 July 2025**.

Data Protection Disclaimer

Details submitted as part of this Call for Sites will help inform the Urban Capacity Study and assist in identifying land for development to contribute to a land supply to meet local need. The submitted information will not be confidential as it will be published as part of the Urban Capacity Study via published reports available for public consumption. This information may also be shared with other parties, including employees of the council, other council departments and third parties, such as the Planning Inspectorate and other Local Planning Authorities.

Details provided in Section 1 will be kept and stored confidentially by the Council and/or its contractor Troy Hayes Planning Limited. Details in Section 2, the names of which should match those provided in Section 1, will be made publicly available as established above. As such, only names of organisations/agents/applications will be made public where it has been clearly declared through this submission form. No other details, such as addresses or contact information, will be made available.

By submitting this form to the Council and/or Troy Hayes Planning Limited, you are providing consent for us to retain your details as part of the Call for Sites process, the Urban Capacity Study and to enter your details to our consultation database so that we may contact you in future to advise on the Local Plan preparation process.

Section 1: Your confidentially held details

Name:	
Organisation (if applicable):	
Position:	
Acting on behalf of (if applicable):	
Address:	
Phone number:	
E-mail address:	

Section 2: Your publicly viewable details

Name:	
Organisation (if applicable):	
Acting on behalf of (if applicable):	

Section 3: Please indicate your position / role in respect of the suggested site

	Yes	No
Site Owner		
Developer		
Land Agent		
Planning consultant		
Local authority		
Community group		
Local resident		
Registered social landowner		
Other (please specify):		

Section 4: Site opportunities

If you would like to suggest a site for consideration in the Urban Capacity Study please supply the following information:

Site address / location:	(please also include a plan, preferably on a scaled OS base, with the site boundary outlined in red)
Site size (hectares):	
Is the site vacant, or cleared?	
What is the current or previous use of the Site:	
Land owners:	
Planning status:	(is it, or has it been subject to proposals in the past)
Potential capacity and development mix:	
Confirm access arrangements to site:	
Confirm that site is deliverable and can be achieved with the Plan period:	
Known constraints to development:	
Was this site submitted for consideration in the HELAA?	

Section 5: General comments on viability and delivery of sites in Rugby

Please provide any comments you have concerning viability and development challenges in Rugby town which may need considering as part of the study and help support delivery of previously developed land for new housing. This may cover matters such as land values, development types and densities etc.

Section 6: Other comments

Please use the space below for any further information you wish to provide.

Section 7: Your data

Please note that the information provided, including contact details, will be supplied to the consultants appointed by Rugby Borough Council to prepare the Urban Capacity Study. Please sign to confirm that you agree to your contact details being used by Rugby Borough Council and their consultants for work in connection with the site being promoted. Signed: …… Date: …… Contact details will only be used as stated and will not be shared with any other third parties.

Appendix 2: Density Analysis

This appendix presents mapping prepared to calculate existing residential densities across Rugby. It includes mapping of:

- Typical residential plot sizes across Rugby
- Different typologies of residential development.
- Location of the sample tiles used to calculate densities
- The sample tiles representing different plot sizes and typologies across Rugby.

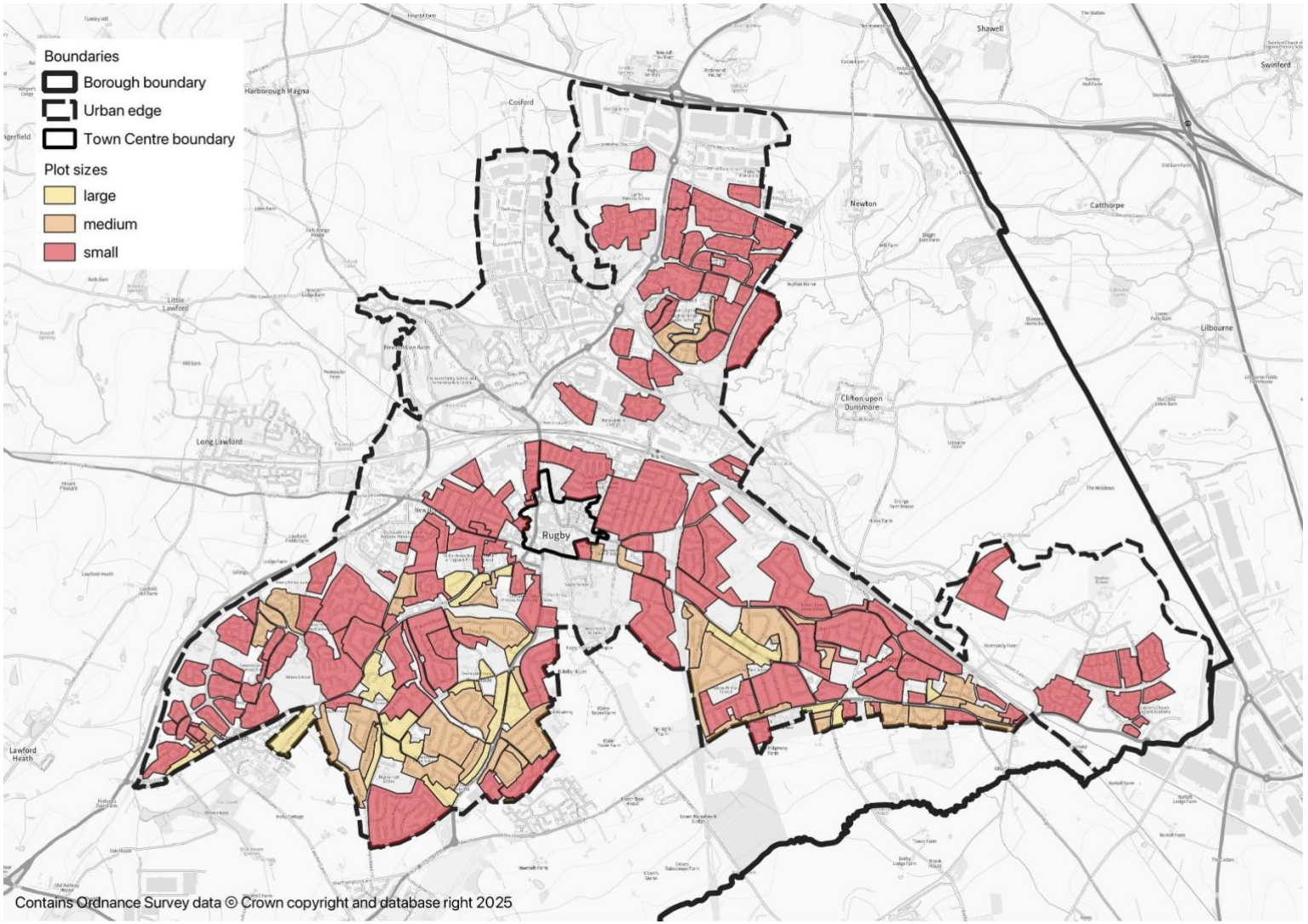


Figure 9: Typical residential plot sizes across Rugby

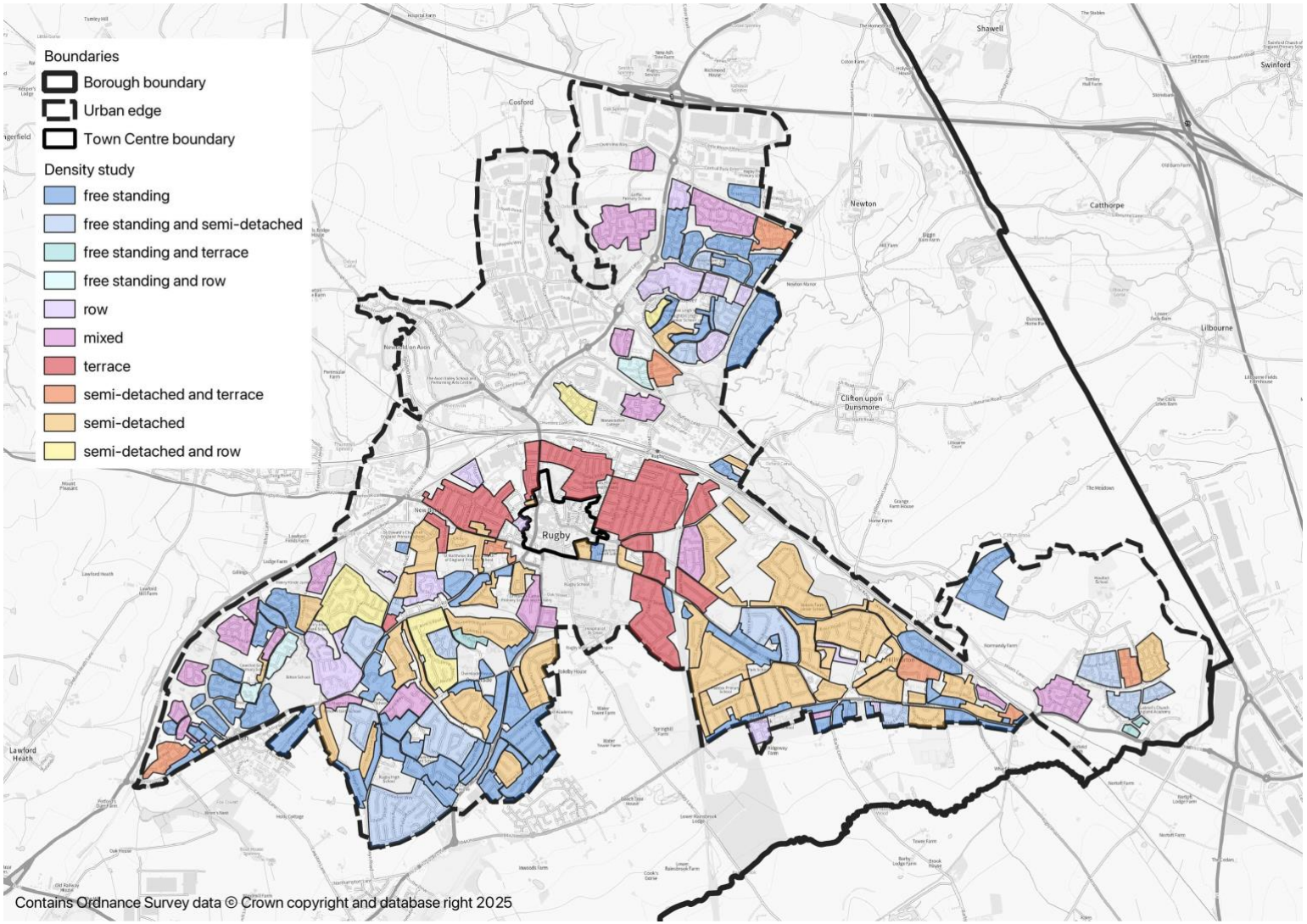


Figure 10: Residential typologies found across Rugby

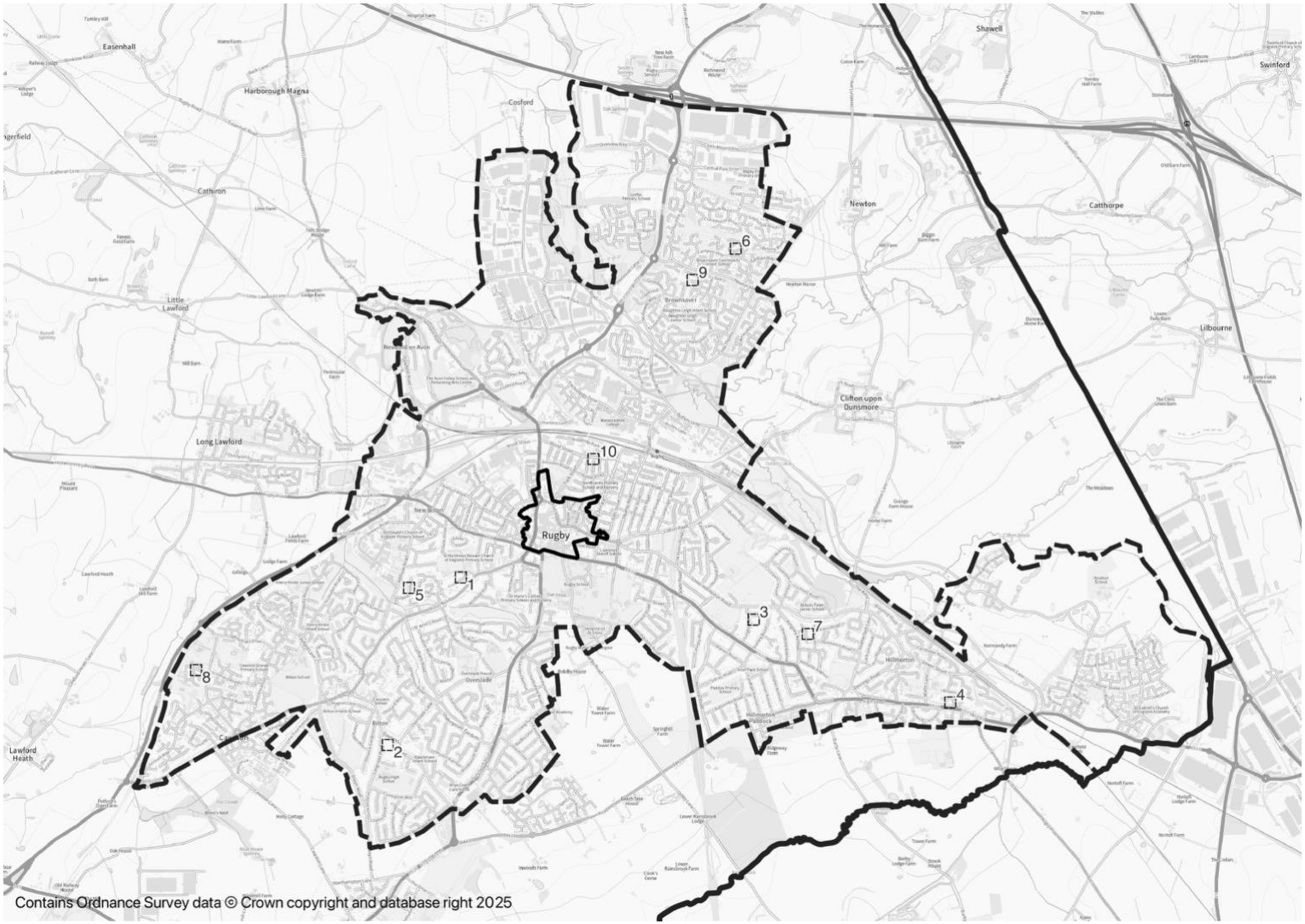


Figure 11: Plan showing location of sample hectare tiles used to calculate residential densities across Rugby

Plot size: large

Typology: free standing

Density: 6 units / 1 ha

Figure 12: Residential sample tile 1; 6 homes per hectare

Figure 13: Residential sample tile 2; 9 homes per hectare

Plot size: medium

Typology: free standing and semi-detached

Density: 13 units / 1 ha

Figure 14: Residential sample tile 3; 13 homes per hectare

Figure 15: Residential sample tile 4; 21 homes per hectare

Figure 16: Residential sample tile 5; 22 homes per hectare

Figure 17: Residential sample tile 6; 26 homes per hectare

Plot size: small

Typology: semi-detached

Density: 32 units / 1 ha

Figure 18: Residential sample tile 7; 32 homes per hectare

Plot size: small

Typology: mixed

Density: 34 units / 1 ha

Figure 19: Residential sample tile 8; 34 homes per hectare

Figure 20: Residential sample tile 9; 45 homes per hectare

Figure 21: Residential sample tile 10; 68 homes per hectare

RUGBY BOROUGH COUNCIL
Urban Capacity Study

Final Report
November 2025

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