



The countryside charity
Warwickshire

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To: Local Plan, Rugby Borough Council

CPRE WARWICKSHIRE RESPONSE TO LOCAL PLAN CONSULTATION

CPRE Warwickshire has submitted responses to the on-line survey questions. For our comments on the questions asked there, please see that set of responses.

General Principles

CPRE Warwickshire wishes to see the principles in the adopted Local Plan maintained:

- No dispersal of development to villages
- No new rural housing allocations (notably Lodge Farm Willoughby)
- Protection of the District's villages from development (notably as many are Conservation Areas)
- Development directions in the adopted Plan followed – to the east (Houlton) and the South west (Cawston)
- No development on land in the Green Belt or south of the B4429-A45 line – notably protecting the Conservation villages of Thurlaston and Draycote from any new development
- Full protection of the Green Belt from development
- Equal protection given to the rural land beyond the Green Belt (parishes of Birdingbury, Leamington Hastings, Broadwell, Grandborough, Willoughby, Flecknoe, Wolfhamcote)
- The Rainsbrook Valley allocation should be deleted. More housing land is available in the SW Rugby (Cawston) area than is currently included in the Plan. That should be used in place of any land in the Rainsbrook Valley which is an attractive part of Rugby's setting.

Level of development

- The annual housing requirement figure issued with the Dec 2024 NPPF is similar to that in the previous NPPF.

- There is sufficient land in the urban area to meet the housing requirement in the 15-year Plan period 2027-2042.
- There is no justification for adding 3 years to the Plan up to 2045.
- Under the figures used in the Reg.18 Draft Plan, the total proposed allocations in villages in the Green Belt amount to 1,728 dwellings, with large allocations at Wolvey and Brinklow.
- The addition of 3 years to the Plan period increases the housing requirement by 1,854 houses (and perhaps over 2,000 allowing for provision for non-use of some sites).
- The Plan should be limited to the standard 15 years and the allocations proposed in villages in the Green Belt should be deleted.

Urban capacity

The capacity of the urban area of Rugby or more development has been underestimated. There is considerable scope for more use of urban land for housing. The **report by Gerald Kells for Brinklow Parish Council** analyses the urban capacity and the requirement in detail. CPRE Warwickshire supports the findings of the Kells report which is attached.

The Council is asked to follow the findings of the Kells report and use it to improve the Local Plan at the next stage (see next paragraph).

Further consultation

The Reg.18 draft Plan has been published for consultation ahead of the currently under way Review of the Green Belt and the transport appraisal. These are due to be completed later in summer 2025. The Reg.18 process is flexible and enables more than one round of consultation on a Draft Plan to be undertaken. We strongly recommend that a second Reg.18 draft Plan be published in autumn 2025 for a new consultation.

The current NPPF ‘transitional provisions’ require submission of a Reg.19 Plan by December 2026 if the current process is to be used. That should be fully practicable with a second Reg.18 consultation before the reg.19 stage.

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RUGBY PLAN: HOUSING
REGULATION 18 CONSULTATION REPORT

For Brinklow Parish Council

Gerald Kells

April 2025

1. Introduction

1.1 My name is Gerald Kells. I am a Policy and Campaign Advisor. I have advised a number of organisations and local groups on Local Plans. I was the West Midlands Regional Policy Officer of CPRE for over ten years.

1.2 I was asked by Brinklow Parish Council to review the evidence underpinning housing need and supply in Rugby to inform their response to the questions set out in the Regulation 18 Consultation for the Rugby Local Plan.

1.3 To do this I have principally considered the Plan itself alongside the Economic Development Needs Assessment for Coventry and Warwickshire (November 2022 HEDNA) the Housing and Economic Land Availability Assessment (HELAA 2025) and the 5 Year Housing Land Supply, as well as other relevant material.

1.4 I was also asked to review the evidence on the two sites allocated for housing in Brinklow. West Farm and Home Farm, Brinklow (Site 337, 75 homes) and land south of Rugby Road (Site 315, 340 homes)¹.

1.5 To do this I have reviewed the evidence published with this consultation, as well as work undertaken for the Brinklow Neighbourhood Plan and the existing plan where appropriate. Unfortunately two key pieces of evidence are not yet available. According to the council, the Green Belt Review has been delayed to take account of changes to the NPPF, notably the introduction of the grey belt concept and the transport assessment is not completed and may not be published before the Regulation 19 consultation.

1.6 This is particularly regrettable because these provide key evidence which is necessary to judge the sustainability of the plan and its allocations.

1.7 The Sustainability Appraisal (SA) acknowledges that transport impacts cannot be assessed at this stage. The site selection methodology refers to '*Transport analysis of all sites by consultants SLR.*' However, the HELAA proformas only set out whether there is access to the site and if it has an undefined potential to impact the SRN. They do not consider the site's impacts including whether it fulfils the NPPF² criteria in Para 115.

1.8 Given that the purpose of the Regulation 18 consultation is to receive representations to inform the Regulation 19 Plan and given this is the appropriate

¹ I have not considered land at Brierley's Farm, Brinklow which was considered as part of the plan development process and rejected. I have also not reviewed land at Lutterworth Road, Brinklow which was rejected by the Inspector of the existing plan as unsuitable.

² All references to the NPPF are to the Dec 2024 publication.

opportunity for a Council to withdraw a site, including on sustainability grounds, the lack of transport evidence to judge sites by is a significant concern.

1.9 I also undertook a site visit to Brinklow on 1 April 2025, as well as Rugby Town Centre.

1.10 My main conclusion is that there is additional housing supply in Rugby which negates the exceptional circumstances for the release of sites for housing in the Green Belt and in particular the two sites in Brinklow.

1.11 This is even more the case if the Council resets the end of the Plan Period to the legal requirement of 2042.

2. Overall Housing Need

2.1 To consider the need for housing I have reviewed the Standard Methodology Calculation considered the previous HEDNA approach and also reviewed the position on employment needs to consider if there is any justification for increasing the requirement.

2.2 have finally examined the basis of the plan period to consider if the overall requirement should be reduced.

a. New Standard Methodology Calculation

2.3 The housing need set out in the Consultation Plan is 12,978 based on the New Standard Methodology (SM) in the NPPF, which leads to a figure of 618 dwellings per annum.

2.4 This is higher than the previous Standard Methodology figure of 525, but slightly lower than the consultation figure of 642 in the draft NPPF (July 2024).

2.5 Notably the actual demographic need in the old Standard Methodology is only 420, so even the 525 was above the actual housing need.

2.6 The New Standard Methodology calculation of housing need (abbreviated as 'NSM' in this report) for Rugby are set out in Table 1, as well as the same calculation using the old methodology.

Dwellings per Annum	0.8% of Stock	Affordability Adjustment (based on 5 year average 2019-2023, 7.66)	Affordability %	New Standard Methodology	Old Standard Methodology (ONS 2014)
Rugby	411	208	50.60	618 ³	525

Table 1: Dwellings per annum (DPA), New Standard Methodology, Rugby

2.7 A general criticism of the NSM is that it is no longer based on household need but on the use of Stock as a proxy, which is then heavily adjusted by an increased affordability add-on.

³ Discrepancy in Table addition due to rounding

2.8 A further criticism is that the heavier reliance on annual affordability makes the NSM, even with the five year averaging, more volatile. If house prices go up, housing need rises, whether or not that reflects local need.

2.9 Moreover, the NSM is biased towards areas where house prices are higher. The affordability add-on in Rugby is 50.60% but in neighbouring Coventry it is only 18.24%.

2.10 Had the old SM been updated to use the more up to date ONS 2016 or ONS 2018 calculation the need would have been even lower at 413 dpa or 480 dpa respectively.

2.11 Unlike in many cases the evidence from in the 2021 CENSUS data, (albeit that remains interim, and is given in Table 2) shows housing levels which are most comparable with the 2014 ONS figures.

2.12 Importantly, however, the population and households in all the ONS projections were heavily over-estimated for Coventry compared to the CENSUS, something that would have been accentuated in future projections. This may well result from well-established problems in student counts, which led to very significant demographic over-estimation.

Rugby	2021 Census Population	Projections for year 2021 in ONS SNPPs and SNHPs	Difference between ONS projections for 2021 and Census 2021	Difference as % of Census
2014ONS	114,400	108,800	-5,600	-4.9%
2016ONS	114,400	109,100	-5,300	-4.63%
2018ONS	114,400	110,169	-4,231	-3.7%
	2021 Census Households			
2014ONS	47,000	46,281	-719	-1.53%
2016ONS	47,000	45,646	-1,354	-2.88%
2018ONS	47,000	45,948	-1,052	-2.24%

Table 2: ONS and CENSUS Results, Rugby

2.13 While all this suggests the NSM is exaggerated in Rugby, the current National Planning Policy Guidance (NPPG) no longer allows authorities to justify an alternative lower housing need calculation than the New Standard Methodology⁴.

2.14 The current NPPG also says that this figure should be under review, but once the plan is submitted can be relied upon for 2 years so the need figure may still change before Rugby's Regulation 19 Plan is submitted⁵.

2.16 It would, however, strongly suggest there is no reason to increase the housing need figure for Rugby.

b. Housing and Economic Development Needs Assessment (HEDNA)

2.17 The other evidence on housing need is the Coventry and Warwickshire HEDNA (November 2022) which considered all the authorities in Coventry and Warwickshire. It would have increase Rugby's need figure to 735 dpa (Table 3.1). However, this is not now the basis for housing need in the plan, although it has informed specific policies on the mix of housing.

Table 3.1 Overall Housing Need (dpa)

	Coventry	North Warks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	HMA
2014-based	3,188	176	435	516	564	675	5,554
Trend-based	1,964	119	409	735	868	811	4,906

⁴ *If authorities use a different method how will this be tested at examination?*

The standard method should be used to assess housing needs. However, in the specific circumstances where an alternative approach could be justified, such as those explained at paragraph 014, consideration will be given to whether it provides the basis for a plan that is positively prepared, taking into account the information available on existing levels of housing stock and housing affordability.

Paragraph: 015 Reference ID: 2a-015-20241212

⁵ *When should strategic policy-making authorities assess their housing need figure for policy-making purposes?*

Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities. However, local housing need calculated using the standard method may be relied upon for plan making for a period of 2 years from the time that the plan is submitted to the Planning Inspectorate for examination

Paragraph: 008 Reference ID: 2a-008-20241212

2.18 Nevertheless, given that the HEDNA is still part of the evidence base, it is worth considering why the HEDNA figure should not be adopted for Rugby.

2.19 Firstly, of course, The HEDNA calculation has not been updated for Rugby (as it was for Coventry) so is now out of date (November 2022).

2.20 Secondly, it does not reflect the impact of the increased NSM housing need figures across the county.

2.21 The HEDNA considers Coventry and Warwickshire to be a single housing market area. Notably the total housing need for the County (including Coventry) identified by the HEDNA is 4,906 dpa (4,457 without the obsolete 35% urban uplift in Coventry) as opposed to the NSM figure of 5,295 dpa as set out in Table 3.

2.22 Moreover, since most of the authorities, barring Coventry and Nuneaton, are not yet at Regulation 19 stage, one can assume they will be required to adopt at least the NSM figure. (I specifically discuss over-provision in Coventry further on).

2.23 Furthermore, as Para 236⁶ of the NPPF explains, Nuneaton and Bedworth will need to immediately review its plan after adoption using the NSM because their Plan Figure of 545dpa is only 74% of the New Standard Methodology figure.

2.24 This means the overall NSM figure is 19% above the overall HEDNA calculation of need in Coventry and Warwickshire.

Dwellings per Annum	0.8% of Stock	Affordability Adjustment (5 year average 2019-23, 5.96)	New Standard Methodology	Old Standard Methodology (ONS 2014)	State of Local Plan
Coventry	1174	214	1388	3082 (2,283 excluding 35% urban uplift)	Reg 19 Consultation Jan-March 2025
North Warwickshire	236	128	364	163	Pre-Issues and Options
Nuneaton and Bedworth	484	253	737	421	Modifications Post-Examination
Rugby	410	208	618	525	Reg 18 March 2025

⁶ Where paragraph 234b applies, if the housing requirement in the plan to be adopted meets less than 80% of local housing need⁸⁵ the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need

Stratford on Avon	532	594	1,126	553	South Warwickshire Reg 18 Plan, Jan-March 2025
Warwick	545	517	1,062	653	South Warwickshire Reg 18 Plan, Jan-March 2025

Table 3: New Standard Methodology, all Warwickshire Authorities

2.25 In other words, unlike under the old SM, the housing provision under the NSM exceeds the HEDNA figure.

2.26 Indeed, neither of the HEDNA's justification for its alternative approach to the then SM still apply:

firstly, that demographic data on which projections are based is demonstrably wrong and cannot realistically be used for trend-based projections on which the Standard Method is based; and

secondly, that demographic trends have changed so much that it is unrealistic to use a set of projections based on information in a trend period to 2014, which is now over 8-years old.

2.27 The third reason is that the distribution of housing in the HEDNA was heavily influenced by the miscalculation of population in Coventry and resulting housing policies which fuelled house building and this migration into neighbouring authorities.

2.28 At the root of this was the long-standing criticism of ONS housing need figures for Coventry, which the CENSUS confirmed to be an over-estimation, although as yet with no official ONS data correcting this. (paras 5.46-5.47).

2.29 To attempt to correct this the HEDNA calculated population growth in Coventry based on dwelling completions and on the patient register. While this approach had potential flaws such as student patients not deregistering with GPs on leaving the area, both methods suggested an actual population of around 347,000 in 2020, rather than 379,387, as well as a different age structure with a much shallower peak in the early twenties, which among other thing could compensate for an overcalculation of students. (Fig 5.17)

2.30 The HEDNA then followed a similar procedure for other Warwickshire Districts on the assumption that the undercalculation of population in Coventry may have partially resulted from migration to those areas. This accounted for some 8,200 people, leaving a residual short fall across the HMA of 24,160.

2.31 The results were compared with the CENSUS results and that comparison was set out in HEDNA Table 5.20, which turned out to be much closer to the CENSUS than the

ONS projections, albeit there may be some issues with the CENSUS In Warwick and Coventry, where students may not have been at the University because of the pandemic and conversely over-estimates of population in areas students come from if they have been counted as living in those areas instead.

2.32 Having concluded that the current population of Coventry and Warwickshire was miscalculated the HEDNA developed an alternative 'trend-based' projection which adjusted fertility, death rates and migration based on trend assumptions across the HMA to establish an alternative projection for housing. These were based on comparison of the 2011 and 2021 Censuses.

2.33 In terms of fertility and death rates (natural growth), these were assumed to be measured accurately. However, if the population was actually smaller (as in Coventry) the % rates must be commensurately higher and these were set out in the HEDNA.

2.34 But since births and deaths rates were assumed to be correctly recorded they concluded migration must not be. To correct this, they adjust migration rates to reflect the population discrepancy using an even split between in and out migration.

2.35 In Coventry's case that amounted to 4,000 persons per year (2,000 in and 2,000 out) and so net migration was reduced by that amount between the Censuses.

2.36 These new trends were applied to their base year, the 2021 CENSUS.

2.37 Future migration was then modelled taking a midpoint between future national population trends and trends from 2020-2030.

2.38 This approach may seem logically sound, but there was a clear problem with it. The previous over-estimation of population in Coventry (and across the county as a whole would) will have influenced the level of development over 2010-2020 (including through the duty-to-cooperate) and so, led to increased housing provision into some areas, especially those which were more affluent.

2.39 That would have facilitated migration into those districts, and in particular moves out of Coventry.

2.40 To turn population into households the HEDNA approach was twofold. Firstly, Icenic adjusted the base level households to match up with housing completions data. The then Household Representative Rates (the measure that determines household size) to the HRRs used in the ONS2014 figures.

2.41 Their assumption, set out in paragraphs 5.142-5.143, was that, because the more recent ONS figures included suppression of household formation, a return to previous rates of formation, particularly in the 25-34 age range, should be expected as we move forwards.

2.42 This widespread criticism of the ONS2016 and ONS2018 figures may, however, be unfair if the slowing down in household formation actually reflects long-term changes which are driven by fiscal and societal factors (especially since the 2008 financial crash) which will remain in force into the future.

2.43 Be that as it may the demographic results and the re-calculation of the old SM were given in Tables 5.32 and 5.33, although a strong interaction between the Coventry and the surrounding Warwickshire districts was acknowledged in Para 5.148. In other words, the distribution of need would itself influence where population goes and households form.

2.44 This led to Table 3.1 of the HEDNA Summary which compared the Overall SM Housing Need based on the HEDNA trend-based analysis with the ONS2014 figures including Coventry's 35% 'urban uplift'.

2.45 The demographic need under the ICENI assumptions was then set out in more detail in Table 5.32 and the then-applicable standard method (SM) calculation based on those figures is set out in Table 5.33.

Table 5.32 Projected change in households – remodelled projection

	Households 2022	Households 2032	Change in households	Per annum
Coventry	141,244	154,202	12,958	1,296
North Warwickshire	27,709	28,653	944	94
Nuneaton & Bedworth	57,302	60,618	3,316	332
Rugby	48,232	54,269	6,037	604
Stratford-on-Avon	61,131	67,271	6,140	614
Warwick	65,503	71,215	5,712	571
Coventry-Warwickshire	401,120	436,228	35,108	3,511

Source: Demographic projections

Table 5.33 Standard Method Housing Need Calculations using revised demographic projections

	Coventry	North Warwks	Nuneaton & Bedworth	Rugby	Stratford- on-Avon	Warwick	C & W
Households 2022	141,244	27,709	57,302	48,232	61,131	65,503	401,120
Households 2032	154,202	28,653	60,618	54,269	67,271	71,215	436,228
Change in households	12,958	944	3,316	6,037	6,140	5,712	35,108
Per annum change	1,296	94	332	604	614	571	3,511
Affordability ratio (2021)	5.96	8.23	7.73	7.47	10.62	10.73	
Uplift to household growth	12%	26%	23%	22%	41%	42%	
Initial need (per annum)	1,455	119	409	735	868	811	4,397
Capped	1,455	119	409	735	868	811	4,397
Urban uplift	35%	0%	0%	0%	0%	0%	
Total need (per annum)	1,964	119	409	735	868	811	4,906

Source: Derived from a range of ONS and MHCLG sources

2.46 It is also important to note that the 1,964 dpa for Coventry included the new defunct 35% urban uplift so the 1,455 dpa figure is more relevant. Moreover, according to the Coventry update to the HEDNA a dip in affordability reduced the HEDNA SM calculation marginally to 1,921 dpa as set out in Table 5.3 of the Update.

Table 5.3 Housing Need Calculations – 2021 and 2023 Affordability Ratio

	2021 Affordability Ratio	2023 Affordability Ratio
Households, 2022	141,244	141,244
Households, 2032	154,202	154,202
Change in Households	12,958	12,958
Annual Change in H'holds	1,296	1,296
Affordability Ratio	5.96	5.57
Affordability Uplift	12%	9.8%
Stage 2 Housing Need	1,455	1,423
Cities' Uplift	35%	35%
Local Housing Need	1,964	1,921

2.47 Under the methodology adopted by Coventry this should have reduced their annual plan figure to 1,423, but Coventry did not adopt that figure in their Regulation 19 Plan (which would have reduced their overall plan need to 28,460) but are still relying on 1,455 dpa as the basis for the Plan, which is itself 67 dpa above the NSM figure.

2.48 In other words the distribution of housing in the HEDNA is influenced by assumptions on household formation and on migration which result from a series of forward projections of previous development patterns in the County, whether those represent a sustainable approach or not.

c. Employment Needs (HEDNA)

2.49 One other question in terms of need is whether there is sufficient housing to meet economic needs. The NPPG specifically identifies this as a reason for increasing the housing requirement above the need identified by the NSM⁷.

2.50 The HEDNA specifically addresses this in Section 7. It starts by projecting the future anticipated economic activity rates across Coventry and Warwickshire (2022-32). It then adjusts those to take account of unemployment rates, double jobbing and commuting patterns.

⁷ The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination. Paragraph: 040 Reference ID: 2a-040-20241212

2.51 In terms of double jobbing it assumes a constant rate but notes it has been rising so this would tend to over-estimate the population requirement although it may be marginal (Para 7.11).

2.52 Perhaps more importantly the HEDNA assumes commuting rates (out-commuting/in-commuting to an authority) stays constant based on the 2011 census results⁸. As a sensitivity it considers 1:1 commuting rate but only for new jobs.

Table 7.3 Commuting patterns in Coventry & Warwickshire

	Coventry	North Warwickshire	Nuneaton and Bedworth	Rugby	Stratford-on-Avon	Warwick	C-W
Live and work in Local Authority (LA)	78,767	8,567	22,121	21,443	23,266	31,809	-
Home workers	10,157	3,451	4,443	5,297	10,476	8,380	-
No fixed workplace	9,367	2,446	3,897	3,410	4,835	4,287	-
In-commute	50,630	25,304	15,048	17,551	25,435	33,760	-
Out-commute	39,851	16,954	29,955	20,566	22,800	25,593	-
Total working in LA	148,921	39,768	45,509	47,701	64,012	78,236	424,147
Total living in LA (and working)	138,142	31,418	60,416	50,716	61,377	70,069	412,138
Commuting ratio	0.928	0.790	1.328	1.063	0.959	0.896	0.972

Source: 2011 Census

2.53 In the case of Rugby there is currently an imbalance in commuting (3,015) or a commuting ratio of 1.063.

2.54 Table 7.6 of the HEDNA turns this into a jobs requirement which is then turned into an economic-led housing requirement, based on the two commuting assumptions in Tables 7.7 and 7.8. The results are set out in Table 7.9 and compared with both the old SM figure⁹.

⁸ I have not located commuting rates from the 2021 census but they would probably not be helpful because of COVID restrictions.

⁹ A lower figure of 516 compared to 525 because it was an earlier year.

Table 7.9 Comparing annual housing need under range of scenarios

	Standard Method	Revised Standard Method	Economic growth (Census commuting)	Economic growth (1:1 commuting)
Coventry	3,188	1,964	936	990
North Warwickshire	176	119	337	396
Nuneaton & Bedworth	435	409	434	372
Rugby	516	735	566	551
Stratford-on-Avon	564	868	779	795
Warwick	675	811	644	688
Warwickshire	2,366	2,942	2,761	2,802
Coventry-Warwickshire	5,554	4,906	3,697	3,792

Source: Range of sources

2.55 The economic housing need for Rugby (551-566 dpa) is considerably lower than the NSM figure of 618 dpa, even with commuting rates staying the same.

2.56 However, it is clearly undesirable (not least from a sustainability point of view) for commuting rates to stay as high and out of balance. Notably Coventry's Plan includes a house building requirement of 1,455 dpa far in excess of the economic need figure given in Table 7.9 (936-990 dpa).

2.57 The provision of new housing in Coventry above the economic requirement in the HEDNA would allow more people who work in Coventry to live in Coventry and so reduce the commuting imbalance.

2.58 This would suggest that the economic evidence would support a lower housing requirement if that were allowed and would also justify Rugby considering a lower housing supply if some of its housing need could be met in Coventry, an issue I will consider under housing supply.

d. Plan Period

2.59 A last point in relation to need is that the proposed date of adoption for the plan In the Local Development Scheme is December 2026¹⁰. This was based on a Regulation 19 Consultation assumed to be in January 2025. The NPPF (Para 72) requires plans to identify housing land for 15 years. That would mean a plan period to 2042 would meet that requirement.

2.60 That is confirmed in the Development Needs Topic Paper (DTNP, Para 1.4) which says:

It is assumed that adoption of the plan will be at some point in 2027. Therefore, the earliest end date for the plan would be 2042.

¹⁰ Local Development Scheme, Dec 2022

2.61 The DTNP, however, goes on to say (Para 1.4/1.5):

The WMSESS and the Alignment Paper provide evidence for future development needs covering the periods to 2045 and 2050. To align with this evidence, the end date for the plan is proposed to be 2045.

2.62 Importantly, this is a choice made by the authority, rather than a requirement.

2.63 In contrast the recent Regulation 19 Coventry Plan (which relies on the same evidence) runs to 2041.

2.64 Given that the Rugby Plan, as set out, requires housing to be removed from the Green Belt, it is unclear why the Council has chosen a Plan Period which adds 3 years (or 1,854 dwellings) to its need. Without it there would be an overall need of 11,124.

2.65 This is even more of concern given the ambitious plans for regeneration that Rugby has for its town centre which would deliver additional brownfield housing (as discussed below) and so mitigate the need for Green Belt release.

e. Conclusions on Need

2.66 The need figure in the Plan of 618 is based on the NSM. This appears to represent an over-estimation of genuine need, which under the old SM would have been 525 dpa.

2.67 The higher HEDNA figure is also no longer applicable as it is based on assumptions that no longer apply and would lead to a less sustainable housing pattern across Coventry and Warwickshire.

2.68 The economic evidence in the HEDNA also suggests there is no need for additional housing above the NSM figure to meet economic needs.

2.69 Furthermore, an adoption date of Dec 2026 means the end of the Plan Period could be reduced to 2042, reducing overall need by 1,854 dwellings and alleviating pressure on the Green Belt and other sensitive sites in the countryside.

3. Overall Housing Supply

a. Housing Supply Calculations

3.1 The assumed housing supply of 14,132 dwellings for the plan period is set out in Policy S2, which is 9% above the housing requirement. This includes current plan allocations, major sites and existing planning permissions (with a 10% discount) as well as an allowance for windfalls under 5 dwellings.

3.2 Policy S6 includes a breakdown of the sites newly allocated in the plan which amounts to 3338 dwelling¹¹.

3.3 I can, however, find no detailed tables setting out how the other figures in S2 are arrived at.

3.4 The 2024-2029 Housing Supply Statement table includes a current supply of 4353 dwellings up to 2031 and a further 6315 beyond 2031, without any discounting. This would amount to 10,668 dwellings.

3.5 However, it includes 350 windfalls (50dpa to 2031). Removing those gives a figure of 10,318. Adding the total windfalls in S2 to the allocations would give a total of 14,706. Allowing for the 10% discount on permission would result in a reduction of 75 dwellings, leaving 14,631, an overall discrepancy of 499 dwellings with Policy S2.

3.6 It is hard to understand why this is without further information and whether the figure in Policy S2 is, therefore, correct.

3.7 The other noticeable thing about the 5-year land supply is that Rugby has consistently over-provided against its plan requirements, amounting to 1193 dwellings overall since 2012, albeit that involved a slow start (perhaps due to recession) but faster delivery later in the plan period.

3.8 Unfortunately past over-achievement is not normally taken into in terms of future need but it does suggest a strong delivery culture.

3.9 The HELAA includes a full list of submitted sites which were considered for inclusion in the plan. A number were discounted, sometimes double-counting, sometimes because they had planning permission and some which were too small (the largest is 0.23 has)

3.10 The known small sites amount to 2.28 has, which at a modest 35 dph, would amount to an additional 78 dwellings.

¹¹ 3358 in the S6 Table is I think at typo.

3.11 Furthermore, where information was lacking assumptions were made about both the developable area of the sites, and the density of development, as follows:

For greenfield sites in calculating the net developable area ratios of 60% of the total site area for larger sites (more than 10 ha), 75% of the site for smaller sites (less than 10 ha) and 100% on sites of less than 1ha. (Para 6.3)

Rural areas, edge of settlements = 35 dwellings per net developable hectare;

Urban areas (town centre) that can accommodate apartments = 100 dwellings per net developable hectare;

Urban areas that cannot accommodate apartments = 75 dwellings per net developable hectare. (Para 6.5)

3.12 Minimum densities are not specifically set down in either the existing or proposed plan, although arguably they should be. There is also no testing that I can see of whether existing allocations could be increased to meet these standards.

3.13 I have not considered in detail the greenfield sites which are not in the Green Belt although I am aware that there are concerns about the landscape impact of allocations in the Rainsbrook Valley (which I have not assessed).

3.14 With that caveat, it is incumbent on local authorities to ensure that sites outside the Green Belt are fully considered so that exceptional circumstances can be established for Green Belt releases.

3.15 I do note that Site 3 (Land west of Lutterworth Road, Brinklow) is identified as suitable, achievable and available in the HELAA but is not included in the Plan.

3.16 That site was allocated, with support from the Neighbourhood Plan Inspector¹², in the Brinklow Neighbourhood Plan following The Brinklow Plan was formally adopted by Rugby Borough Council on 14th December 2022¹³ and so now forms part of the Development Plan for Rugby Borough.

¹² Brinklow Examiner's Report (August 20330 Para 93

I recommend:

Policy H04, delete wording and replace with: "The development of land at Lutterworth Road (see Figures 4 and 5) as a rural exception site for the development of up to 12 affordable houses and up to 7 elderly persons dwellings will be supported subject to it being demonstrated that the development meets identified housing needs. Proposals must demonstrate how development will retain and enhance the significant landscape features identified on Figure 5."

¹³ under section 38A(4) of the Planning and Compulsory Purchase Act 2004(as amended)

3.17 Concerns were raised in the previous plan's landscape assessment (which I discuss in detail in paras 4.22 -4.30 below) but those were reviewed as part of the Neighbourhood Plan process and the site found acceptable. As the site is not allocated in the Regulation 18 Plan, however, its landscape impacts have unfortunately not been reassessed as part of the landscape appraisal for this plan.

3.18 I also understand that the Parish Council are actively working with the landowner to promote the submission of a formal planning application for the development of the site in accordance with the details of Policy HO4 of their Neighbourhood Plan.

3.19 While policy HO4 allows for up to 19 dwellings to be constructed but the Parish Council say the final number of houses submitted may now be 18 units, with details of the layout still awaited.

3.20 Given that the site is allocated in the Neighbourhood Plan, as identified in the HELAA and the principle of development accepted by the authority, following adoption of the Neighbourhood Plan, I am not sure why it is not allocated.

3.21 I have, however, considered the brownfield sites identified in the HELAA in more detail and the full list is set out below. Those marked in bold are already included in the land supply figure for the plan. It is however currently unclear whether the Central Shopping Centre proposal is included in those calculations¹⁴.

62	Morgan Sindall House, Corporation Street, Rugby	0.3	90	Allocation
152	John Barford Car Park, Rugby	0.6	62	Suitable/Not available.
153	Westway Car Park, Rugby	0.3.	26	Suitable, available and achievable.
227	Former Newton Vehicle Rentals Site, 117 Newbold Road	0.6	122 (17 in HELAA)	Planning Permission. In 5 year land supply.
245	Land North of Projects Drive, Rugby	2.5	100	Suitable, achievable and available - residential

¹⁴ Requested confirmation from Rugby Council

				(application for 101 units withdrawn. Various issues to address)
255	Myson House, Railway Terrace, Rugby	0.5	96 (51 in HELAA)	Application awaiting determination (Rugby Regeneration Strategy - SG4)
278	Stagecoach Depot, Railway Terrace, Rug	0.4	41	Discount - availability No planning history. (Rugby Regeneration Strategy - SG3)
279	Stagecoach Depot, Railway Terrace, Rug	0.4	41	Discount - availability. No planning history. (Rugby Regeneration Strategy - SG3)
280	Mill Road Car Park, off Mill Road, Rugby	1.3	126	Discount - availability (Rugby Regeneration Strategy - Station Gateway Development (SG1))
281	Royal Mail Sorting Office, Mill Road, Rugby	0.4	40	Discount - availability (Rugby Regeneration Strategy (SG1))
282	Former Cemex House and adjacent car park, Evreux Way, Rug	0.6	60	Suitable, achievable and available (Outstanding Retail

				Application, Undetermined)
283	Rugby Central Shopping Centre, Rugby	2.2	216 (Planning permission but not in 5-year land supply, or plan supply)	Suitable, achievable and available (mixed used application approved 2024)
332	Albert Street, Rugby	0.3	25	Allocation

Table 4: Brownfield Sites in the HELAA

3.22 In total these amounts to 748 dwellings, including Rugby Central, which are not accounted for in the Plan. In regards to Rugby Central it was explained to me by the planning team that:

At the moment a capacity figure for Rugby Central isn't included in the preferred options consultation document. This is one of the urban sites, together with Rounds Gardens, that we are trying to firm up a capacity figure for this summer for inclusion at Regulation 19. We are hopeful that this capacity figure will be higher than the 210 units in the permission you refer to.

The figures on existing permissions will be re-based to a 1 April 2025 base date when we complete our current monitoring round over the next couple of months. This will add in some new permissions, adjust for 2024-25 completions and remove some permission where the land is no longer proposed to be brought forward for residential.

3.23 Notably, many of these sites are included in the Town Centre Regeneration Plan for Rugby which was consulted on between September and November 2021¹⁵. This identified key development opportunities as shown below.

¹⁵ <https://www.rugbytowncentre.org.uk/areas-of-change-in-the-town-centre>
<https://www.rugbytowncentre.org.uk/key-development-opportunities>



3.24 Following on from that consultation a Rugby Regeneration Strategy was published.¹⁶ Under Town Living, it says (Para 3.112-3113):

Rugby is a growing borough with a significant amount of residential development coming forward in key locations. Most significant is the urban extension at Houlton which has proposed development of up to 6,000 homes. Closer to the town centre is Rounds Gardens which has the potential to deliver circa 400 homes and Cattle Market which will deliver approximately 360 homes. However, to this point, there has been limited new build residential development in the town centre.

Residential development is an important component of any town centre regeneration programme. It represents a significant opportunity to drive greater activity within the centre and can meet specific housing needs in a positive way - including locating older person and affordable living close to amenity and service provision.

3.25 Some of the development sites identified, (such as the car parks,) are also currently in the control of Rugby Council.

¹⁶ Rugby Regeneration Strategy, November 2022

3.26 Given the current status of these sites, it may not be possible to allocate them in the Plan. However, it does suggest evidence of large sites which, in terms of the Plan, would count as windfall sites.

3.27 A further important element is the need for affordable housing provision. While the need for housing is not directly related to the overall housing need, it does represent an important part of housing provision. The HEDNA includes a table of estimated need (as of 2022) in Table 8.45. This shows significant need, particularly for rented accommodation.

Table 8.45 Estimated annual need for affordable housing split between rented and affordable home ownership – Coventry & Warwickshire

	Rented affordable need	Affordable home ownership need	Total annual need	% as AHO
Coventry	1,887	149	2,035	7%
North Warwks	131	2	133	1%
N & B	407	-16	391	-4%
Rugby	407	88	495	18%
SoA	419	129	547	24%
Warwick	582	258	839	31%
Warwickshire	1,946	460	2,406	19%
C & W	3,833	609	4,441	14%

Source: Draws from earlier analysis

3.28 I have not looked in detail at affordable housing need but clearly, provision of affordable housing within Rugby, and specifically around the centre, could help meet that need.

b. Windfalls.

3.29 The plan includes an allowance of 50 dpa as windfalls, 1050 dwellings in total (21 years, excluding years 1-4). This is based on the average of windfall monitoring for sites under 5 dwellings since 2011. The figures supplied by Rugby Council are set out in Table 5.

3.30 It can immediately be seen that the actual average is 56.5. A windfall figure of 56 would give a total of 1,176 dwellings. Notably in 2012-14 there are two abnormally low years (perhaps due to the recession). Removing those gives an arguably more realistic average of 63 dpa, which would give a figure of 1,323 windfalls over the Plan Period.

Year	Windfall Completions
2011/12	74
2012/13	97
2013/14	25
2014/15	12
2015/16	73
2016/17	56
2017/18	69
2018/19	62
2019/20	43
2020/21	87
2021/22	51
2022/23	46
2023/24	39
Average	56.5

Table 5. Historic Windfall Completions (Under 5 dwellings) provided by Rugby Council

3.31 The cut off of 5 dwellings is also surprisingly low. A more usual cut off is under 10 dwellings.

3.32 When questioned about this and a lack of consideration of large windfalls the response from Officers was:

By large windfalls I assume you mean completions on non-allocated sites. These are a less predictable form of supply than sites smaller than 5 units and any averages would be skewed by one or two large sites which may not be replicable. Also, making a large site windfall assumption based on past delivery would (1) risk double counting both with existing planning permissions and site allocations, and (2) be hard to defend unless we can identify specific HELAA sites which could produce this windfall. Overall, we think it is a more defensible position to allocate for the land supply we need rather than rely on it coming forward through windfall, except in the case of small sites below the scale that we would usually allocate.

Why have we chosen 5 rather than 10?

This is a historic practice in terms of how we produce our five-year land supply position statements. For 5 or more dwellings the supply is based on specific permissions, not a windfall assumption. I think that is a reasonable position to continue to adopt.

3.33 I note that the table is actually for completions, rather than permissions, which is likely to be more reliable (as it accounts for lapses) but more importantly in terms of small sites the cut off is lower than most other authorities.

3.34 The approach is also inconsistent with Policy S6 which includes an allocation of 3 dwellings, and with Appendix 3 of the HELAA which includes a discounted site up to 0.23 hectares which could accommodate up to 8 dwellings.

3.35 Indeed, the identified small sites already identified in that Appendix would provide 2.28 hectares of land or 79 dwellings.

3.36 In further clarification it was explained that:

We have data on all housing completions in the borough dating to at least 2003. We could go back through past records and identify which completions were on allocated sites and which were not, because that data was not recorded in the authority monitoring reports or the records themselves. For the reasons I have explained, I don't think that is a worthwhile exercise because I don't think having a large site windfall assumption is a reasonable approach for the new plan. For example, all of the houses permitted at appeal based on a five year land supply argument at Ashlawn Gardens are technically windfalls based on the 'not allocated' definition.

3.37 This suggests that the choice of up to 5 dwellings for small windfalls reflects previous monitoring and no consideration has been given to the impact of adopting the more normal 10 dwellings for small windfalls. It is clearly not possible, without that source data, to consider what impact this would be but it does suggest the small windfall calculation is simply too low.

3.38 A further important question is whether Rugby should allow for a large windfall allocation.

3.39 NPPF Para 75 sets out how windfalls should be addressed saying:

Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

3.40 Importantly, neither NPPF (nor NPPG) restrict the size of windfalls. The glossary of NPPF defines them simply as:

Windfall sites: *Sites not specifically identified in the development plan.*

3.41 In this case we have limited information on historic rates. We have no information on sites of 5 or more dwellings.

3.42 This is in contrast to other Councils. Coventry's evidence base used all historic windfalls completions, for example, and South Worcestershire identified both small and large windfalls in their housing calculations for their submitted plan.

3.43 The lack of consideration of large windfalls is also at odds with the evidence the council itself has. Leaving aside the Neighbourhood Plan site in Brinklow, the HELAA identifies land for at least 748 dwellings in Rugby Town Centre, which are part of a positive strategy by the council to regenerate the centre.

3.44 It is hardly credible that none of those sites will come forward by 2045, nor that other large sites will be subject to change of use, especially given on-going changes in retail and office requirements, which increase working from home and on-line shopping.

3.45 Of course, it is not possible to quantify a reasonable windfall allowance unless and until the council publishes the historic data for small windfalls (up to 10 dwellings) and large windfalls, or even to verify whether there have been only one or two sites over 5 dwellings.

3.46 However, even taking the current evidence, a figure of 1,323 for windfalls under 5 dwellings seems to me reasonable, and a further 748 dwellings, based on the Town Centre HELAA evidence would be a starting point for larger windfalls. A conservative total of 2,071 dwellings would amount to a modest 14% of the adjusted 15,187 supply, (that is before any Green Belt sites were removed).

3.47 This would, on its own, create an oversupply of 2,209 (17%) or 3,815 (36%) based on a plan period to 2042.

3.48 A common objection to the inclusion of windfalls, and to the number of windfalls in a plan, is that they are uncertain and they are not plan-led.

3.49 In regards to certainty the NPPF sets out 3 windfall tests:

strategic housing land availability assessment, historic windfall delivery rates and expected future trends.

3.50 While we do not have all the historic data, we have the HELAA evidence and evidence relating to future trends and the council's policy towards them.

3.51 In regards to the plan-led system, it is clear that the over-whelming supply, 88% before any further adjustment, would be on allocated sites. Not only that but windfall sites are likely to come forwards whether or not they are in the plan. And finally the evidence suggests larger windfalls will come forwards on brownfield sites in Rugby and that is in line with the Council's plan policies.

3.52 This is clearly articulated in Plan Policy C1 for Rugby Town Centre which specifically includes

a new apartment living quarter in the Station Gateway character area surrounding Rugby Station. (A vi)
and: deliver high quality urban living (B vii)

3.53 It is further worth noting that Para 147 of the NPPF¹⁷ requires authorities to *make as much use as possible of suitable brownfield sites and underutilised land* before releasing Green Belt. As it stands I do not consider this requirement has been met.

c. South West Rugby

3.54 Another issue in terms of supply relates to the South West Rugby strategic allocation. The allocation includes Site ID1, 40.70 hectares allocated for Employment Land.

3.55 This site is safeguarded in the existing plan (Para 4.61¹⁸) for development beyond 2031, but it is not stipulated in that plan if it should be for housing or employment.

3.56 It is shown as safeguarded in the South West Rugby Masterplan, as an inset into the surrounding housing, albeit with an open space buffer.

3.57 In the Preferred Option Plan Policy S3 identifies it as South West Rugby Employment Phase 2, providing 130,000 sq. m of employment land.

3.58 However, I note that S3 includes a total supply of 1,231,987 sq. m of employment land whereas the identified need for Rugby is 1,026,546 sq. m. (284 hectares) according to Para 1.36.5 of the DNTP.

¹⁷ Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy:

makes as much use as possible of suitable brownfield sites and underutilised land;

optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

¹⁸ As such an area of land is safeguarded within the South West Rugby allocation, as identified in the Policies Map to assist in meeting the Borough's development needs beyond 2031.

3.59 This would equate to an oversupply of 205,441 sqm, or 20%. However, I am concerned that the need figure may already contain flexibility.

3.60 In this regard, I was not asked to look into the calculation of Employment land needs in detail but I would note that it is based on 3 things.

3.61 Firstly, an assumed need for offices based on the HEDNA. Other plans have adjusted their office requirement downwards because of increased home working but in this case the supply exceeds the need so that has not been done.

3.62 Secondly, and more significantly, an assumption about the needs for large site based on the West Midlands Strategic Sites Study/Alignment Paper.

3.63 The DNTP does not go into details about how that figure was achieved but I would be concerned about whether

1. it took full account of the National Infrastructure sites, such as West Midlands Interchange,
2. was clear how much of this was for replacement sites, to avoid double counting with sites that would be recycled for other industrial sites, and
3. how much oversupply was already factored in prior to the oversupply in the local plan.

3.64 Thirdly, an assumption about small sites based on previous completions.

3.65 This approach to small sites is common but there is a final stage where the large site and small site needs are simply added together (DNTP: 1.36.5). At this point there can be a significant risk of double counting where land is freed up by recycled larger sites.

3.66 Further work would need to be undertaken to consider in detail the justification for the overall employment requirement and the justification for such a significant oversupply in the plan.

3.67 Reducing the length of the plan, as suggested above, would also impact on the overall employment need.

3.68 There may be a particular qualitative need for the South West Rugby site to be allocated for employment land rather than housing which I have not examined and I cannot find promoted in the plan.

3.69 However, if the site were released for housing instead, using 60% of the site with a 35 dpa net density as the plan requires, would provide an additional 854 homes, although this might depend on both a realistic Housing Trajectory for the allocation and any additional open space requirement.

d. Duty to Cooperate

3.70 The final issue on relation to supply is whether adjacent local authorities are in a position to help meet housing need, something also identified in Para 147 of the NPPF when considering Green Belt releases.

3.71 In this case the situation in Coventry is the most significant.

3.72 The same methodological change to the Standard Methodology which increased Rugby's need has dramatically reduced Coventry's (including removing the 35% urban uplift).

3.73 The NSM figure for Coventry is now 1388 dpa, 27,760 in total, lower than the 1455 in their Regulation 19 Plan (1340 less over their plan period.)

3.74 Coventry's supply, according to their Regulation consultation is 31,493 dwellings. This would amount to an excess supply of 3,733 dwellings. However, my report for KOGG (Keep Our Greenbelt Green) on Coventry's housing calculations showed strong evidence for a further supply of at least 4,200 dwellings, based on more realistic assumptions of windfall and student accommodation. My figures would create a total excess supply of at least 7,933.

3.75 While my evidence provides justification for removing some sites from the Coventry Plan (as KOGG argue) it could also open up the opportunity for Coventry to meet some of the needs of neighbouring authorities, especially since the NSM has increased their housing need while reducing Coventry's and especially because of the impact on Green Belt and sensitive landscapes in those authorities.

3.76 On a practical level such as approach could also help reduce the imbalance in commuting to Coventry from Rugby, including from villages close to Coventry such as Brinklow. Thus producing a more sustainable pattern of development.

3.77 In other words Rugby should now specifically approach Coventry to discuss whether some of its housing provision can meet Rugby's increased need.

e. Conclusions on Supply

3.78 There are a number of issues on supply which are not clear to me, but which the council may wish to review before the Regulation 19 stage.

3.79 However, it is clear that the level of windfalls is significantly over-counted. Based on the current plan period that would suggest an oversupply of approximately 2000 dwellings, or 4,000 if the end of the plan period is reduced to the necessary 2042.

3.80 There may also be a potential to increase supply on the South West Rugby site if the currently safeguarded land is allocated for housing instead of employment.

3.81 This would significantly reduce the need for additional housing to be identified, especially in the Green Belt, as well as in sensitive areas, such as the Rainsbrook Valley.

3.82 In fact, of the sites proposed for allocation in S6, 1,728 dwellings are proposed on sites which are wholly or mostly Green Belt¹⁹.

Area	Title	Dwellings
Brinklow	West Farm/Home Farm	75
Brinklow	South	340
Long Lawford	Coventry Road	400
Newbold	Lea Crescent	20
Stretton	Knob Hill	3
Stretton	West of Fosse Way	40
Stretton	North of Plott Lane	125
Wolston	Dyers Lane	15
Wolvey	Land by cemetery	60
Wolvey	Land South of the village	500
Wolvey	Land West of the village	150
TOTAL		1,728

Table 6: Green Belt sites allocated in Local Plan

3.83 This includes the 415 on the two sites in at Brinklow and supports the view that exceptional circumstances do not exist for their release.

3.84 As well as reducing the impact on the countryside, such an approach to housing supply would also reduce the ‘dispersed’ nature of the plan and concentrate more development on the main centre of Rugby, potentially reducing traffic generation, climate change impacts and access to key services and public transport.

¹⁹ Sites 6, 3, 75, 81, 84, 96, 100, 134, 309, 315, 316, 377.

4. Housing Sites in Brinklow

4.1 In terms of looking at sites in more detail in Brinklow I have considered the village setting as well as the two sites, based on background information and my observations on my site visit.

a. Brinklow

4.2 Brinklow is a village located approximately 5km from the edge of Coventry and 8 km from the edge of Rugby. It is designated as a Main Settlement in Policy S2 of the plan.

4.3 I understand that Rugby and Coventry would be the main commuting destinations from the village, although the Magna Park distribution centre may also attract some commuters.

4.4 The village consists of a main road, the B4455, which meets the Coventry Road. There is a significant extension to the village south of the Coventry Road.

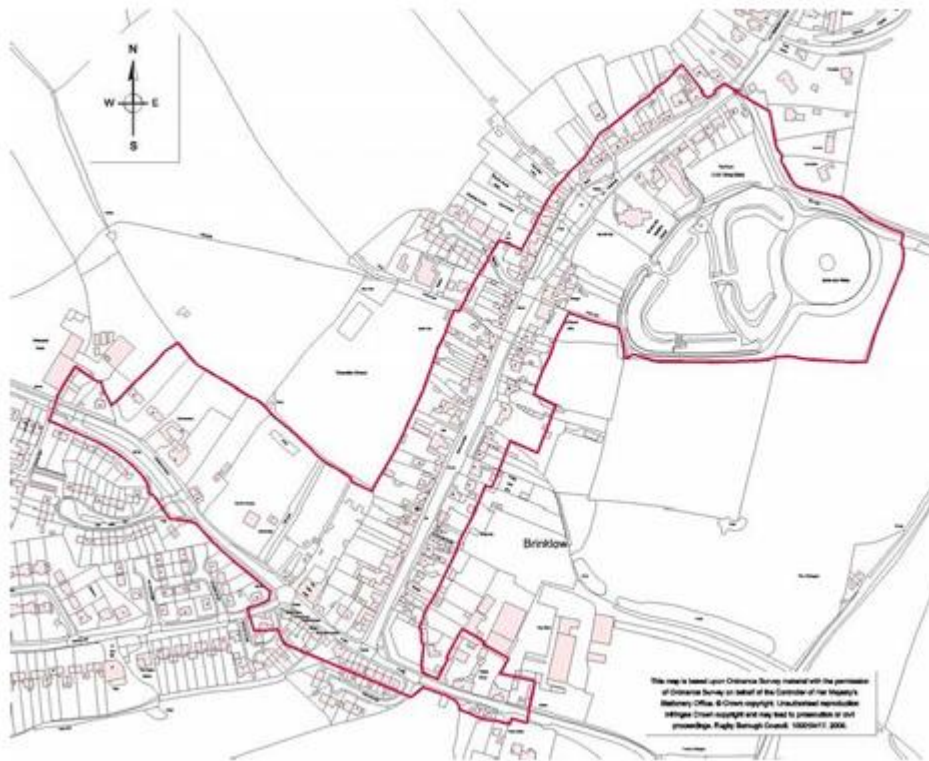
4.5 In terms of facilities there is a post office and store, as well as a Deli and three pubs. There is a Surgery, which has responded to Brinklow Parish Council (See Appenidx 3, 27 March 2025 e-mail) explaining why it would not be in a position to accept more patients, as well as an infant school, where expansion would be severely constrained by adjoining buildings.

4.6 All children over 5 are bused to school.

4.7 There is also a Playing Field which is managed by the Parish Council.

4.8 Much of the core of the village is in a conservation area, which includes Brinklow Castle, the mound of a Norman Castle and a Schedule Ancient Monument, as well as the historic church and a number of historic buildings, including the older parts of West and Home Farm where development is proposed. Home Farm is also a listed building.

MAP 1 CONSERVATION AREA DESIGNATION



4.9 There is a conservation appraisal from 2010 which includes more detail on the historic nature of the village.

4.10 The village has limited access to Public Transport. There is no railway station and one bus (85) runs hourly from Coventry to Rugby during the day and two-hourly on Sundays.

4.11 The village is surrounded by Green Belt and there are three local wildlife sites identified in the Neighbourhood Plan. There are a number of footpaths and area of public open space including around the Castle.

4.13 There is visible evidence of ridge and furrow farming on the fields south of the Castle as well as on the field south of the Coventry Road proposed for development.



4.14 The Castle mound is a particularly prominent feature in the landscape, from which there are largely unbroken panoramic views of the surrounding countryside.

4.15 When I visited the village there appeared to be considerable through traffic but there is currently no modelling to support accurate figures

4.16 CrashMaps shows 5 personal injuries on the B4455 in the village in the latest 5 data years (2019-2023). There are two close to the War Memorial and one at the bend by the boarding kennels.

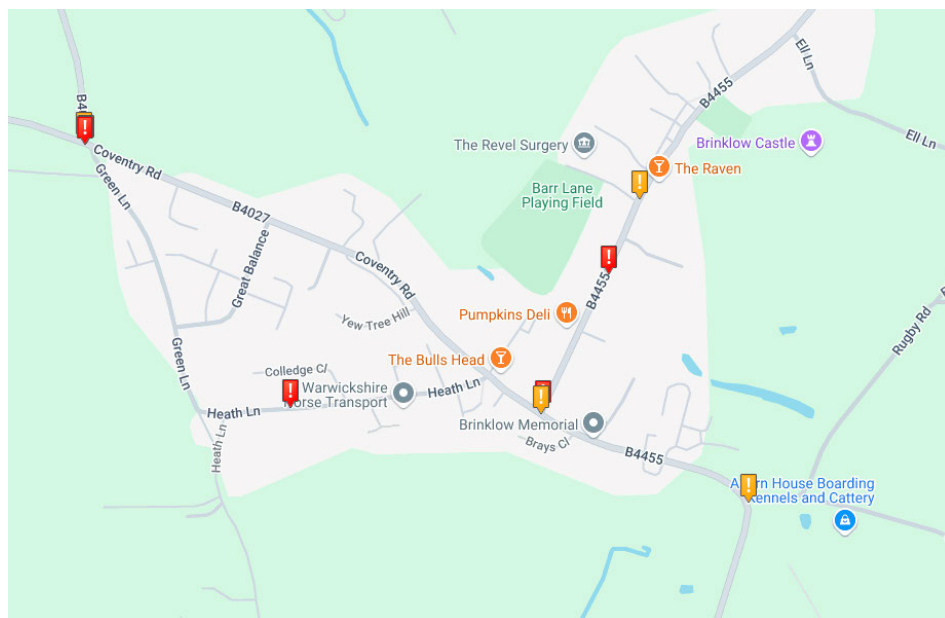


Table 7. Brinklow CrashMaps Data 2019-2023

4.17 When I looked at the full Crashmap data (back to 1999) clusters of accidents were clearly evident at those two locations which would not seem surprising given the limited visibility at those junctions and potential for speeding traffic.

4.18 The nearest traffic count site is on the Coventry Road (B Road) between Combe Abbey and Brinklow (number: 948618) shows 4534 aadt (although this is the last count in 1999) including 199 HGVs. On the A428 Site 37173 shows 9671 vehicles including 260 HGVs, but this is before the B4455 junction to Brinklow.

4.19 While this suggests busy roads it would need more detailed modelling (not yet published) to fully examine the traffic implications of the Plan's housing proposals for the village.

4.20 As a rough guide the recent South Worcestershire Plan modelling used a.m. and p.m. peak trip rates of between 0.4 and 0.5 per dwelling for different authorities. This would amount to between 166 and 207 additional vehicles from the two proposed developments in the peak hours.

5.3. SWDP Trip Generation and Distribution

Trip rates for housing developments, obtained from NTEM v8, are presented in Table 5-2 for both AM and PM peak hour periods, while trip rates for employment developments are provided in Table 5-3 for the same peak hour periods.

Type	Unit	AM Peak Hour		PM Peak Hour	
		Arrival	Departure	Arrival	Departure
Bromsgrove	Per Dwelling	0.070	0.538	0.509	0.188
Malvern Hills	Per Dwelling	0.067	0.467	0.453	0.176
Redditch	Per Dwelling	0.065	0.499	0.482	0.182
Worcester	Per Dwelling	0.064	0.474	0.463	0.180
Wychavon	Per Dwelling	0.067	0.486	0.472	0.180
Wyre Forest	Per Dwelling	0.063	0.450	0.444	0.174

Table 5-2: Trip Rates for Housing Development in Do Nothing Scenario

4.21 The Plan proposes allocating two sites for housing in Brinklow. West Farm and Home Farm, Brinklow (Site 337, 75 homes) and land south of Rugby Road (Site 315, 340 homes). Site 337 is a composite of two sites (Site 5 and 89) which are assessed separately in the HELAA and subsequent technical reports. Earlier Work links West Farm to the field opposite.

4.22 I understand Brinklow currently has 496 homes and a population of approximately 1100, so the two proposed new sites would a substantial increase the amount of housing in the village (87%) even without the additional neighbourhood plan site.

4.23 I also note that a further site (D3.7) proposed for the village in the existing plan was rejected by the Inspector, in particular because it:

would cause harm to the openness and purposes of the Green Belt, as well as to the character of the countryside and the setting of the Brinklow Conservation Area and the Scheduled Ancient Monument comprising the motte and bailey.

4.24 That site is not allocated in this plan.

4.25 There is also the infill proposal for houses on Lutterworth Road, allocated in the Neighbourhood Plan (as discussed above in Paras 3.15-3.20), which is also and Site Reference 3 in the HELAA, Land west of Lutterworth Road, Brinklow, and is identified there as suitable, achievable and available.

Site reference: 3

Land west of Lutterworth Road, Brinklow

Conclusion: Suitable, achievable and available



4.26 It would specifically provide up to 12 affordable houses and so assist in meeting the need for affordable housing in the area.

4.27 In considering that site the HELAA commentary refers to a:

previous landscape study as Landscape Sensitivity - High (BK07) which states: "This zone would be inappropriate for development due to its small scale, pastoral

qualities which act as a transition between the settlement and wider farmland and connects with the stream corridor of Smite Brook".

4.28 What it does not say is that during the Neighbourhood Plan process the Parish Council, recognising the need for a landscape assessment on the site, commissioned a more detailed report on the site from Glenkemp Landscape Architects²⁰.



Photo 1: Part of HELAA Site 3, Lutterworth Road

4.29 That document identified the site's context and set out an assessment methodology, the local planning policy context relating to landscaping and potential effects and a mitigation strategy and.

4.30 It concluded by saying (Para 8.1):

This assessment finds that it should be possible to introduce residential development on the site as proposed without generating any notable adverse landscape or visual effects.

4.31 It also explained that the previous BK-07 parcel actually related to a wider area than the site itself saying (Para 8.3):

²⁰ Land west of Lutterworth Road, Brinklow, Landscape and Visual Outline Appraisal for Brinklow Parish Council, Glenkemp Landscape Architects December 2020, [Appendix 4].

Without having researched the assessment methodology that resulted in the larger landscape unit BK-07 being identified as a single entity, it is clear that the characteristics of the landscape of the proposed development site differ from those of the larger unit in important key areas, such as the intervisibility of the site and the surrounding rural landscape.

4.32 It went on to say (Para 8.4) that:

When assessed on its own merits, it is considered that the site is less sensitive to development than previous reports would suggest, and that development of the site is possible in a manner that does not result in notable adverse landscape or visual effects which cannot be adequately mitigated.

4.33 I also note that both the site and the landscape report were referenced in the Basic Conditions document²¹ that accompanied the formal Neighbourhood Plan process which showed the site was in compliance with the existing adopted policies of the Local Authority, something accepted by them at that time.

4.34 Without any newer landscape assessment the Glenkemp report, and the accepted Policy HO4 Lutterworth Road, Brinklow²² set out the most up to date position and would, in my view, support strongly the site's allocation in the Rugby Plan.

4.35 The land around Brinklow is all protected Green Belt. In the 2015 West Midlands Green Belt Review, which informed the previous plan and the Neighbourhood Plan 3 parcels were identified around Brinklow, BR1, 2 and 3.

4.36 The two Brinklow allocated sites are in parcels BR2 and BR3, both of which were scored at 12/20. This reflected the openness of the countryside, but was lower because they were not adjacent to a historic town, although clearly Brinklow is an important village in heritage terms.

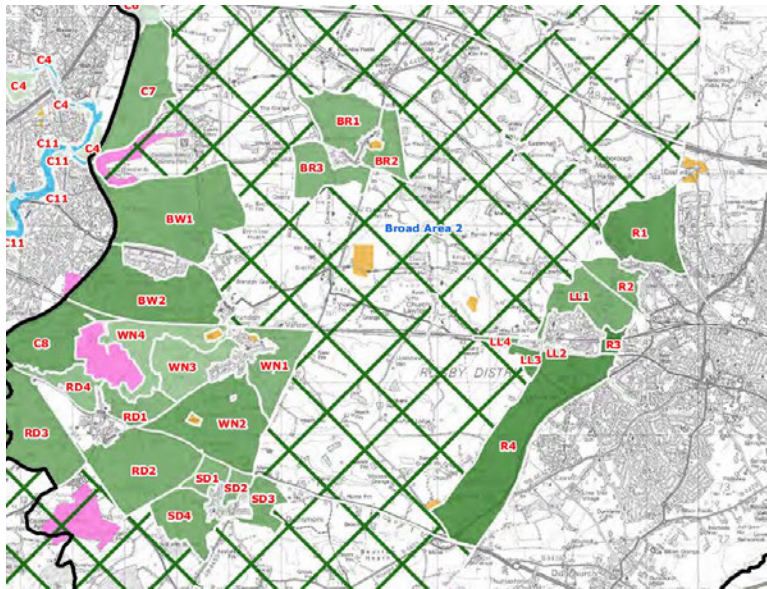
4.37 A review of the Green Belt assessment is expected to take account of the updated NPPF²³ but will not be available for this consultation.

4.38 In terms of the sites in question they do not appear to me to constitute Grey Belt except for the area of site 337 which is previously developed (i.e. contains hardstanding.)

²¹ Brinklow Neighbourhood Plan, 24 January 2022. Basic Conditions Statement 2021-2041

²² see pages 15 to 18 and paragraphs 2.12 to 2.26 of the neighbourhood plan.

²³ NPPF Para 148 Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.



4.39 Based on the previous assessment they play a significant contribution in regards to the Green Belt purpose (a) in Para 143 of the NPPF (to check the unrestricted sprawl of large built-up areas) and even if they did not, they would be excluded under the definition of Grey Belt in the NPPF which:

excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

4.40 The criteria in footnote 7 (via footnote 75) clearly includes development which impact on the setting of a scheduled monument, in this case Brinklow Castle.

b. Allocated Brinklow Site 315

4.41 Site 315 includes two fields which are bounded by Heath Lane and Coventry and properties on those road, as well as a public right of way (ProW). When I visited the larger field was being harvested.

4.42 It is entirely in the Green Belt.

4.43 The HELAA describes the site as:

Green Belt site. Would combine sites 30 and 82. Further assessment required in relation to location and infrastructure requirements.

4.44 Heath Lane is a narrow unlit road with limited width. The plan says that access would be from Bray Close (off the Coventry Road) and Heath Lane. A pedestrian crossing would be provided across the B4455. Apart from a children's/youth play

provision no additional infrastructure facilities are proposed to support the development.



4.45 The landscape sensitivity assessment refers to the mature trees and hedgerows on site and also that:

4.46 There appears to be a drainage ditch at the southern edge of the site, and a small pond on the northern edge bordering the public footpath, (ProW).



Photo 2: Pond on footpath by Site 315

4.47 I noted the views from the ProW across open fields and I understand it is well used by villagers.



Photo 3: View from ProW across Site 315

4.48 It refers to:

The conservation area appraisal notes the availability to the south of views to the countryside on Rugby Road and states that the designation benefits from its rural setting.

4.49 It also identifies that:

The scenic value relates to medium to long views across farmland and the B4455 and its contribution to providing a rural setting to Brinklow.



Photo 4: Site 315 from B4455

4.50 The heritage assessment identifies the ridge and furrows in the Eastern Field noting:

It is characterised by a mix of cultivated and pastoral fields, with hedgerow boundaries. The eastern field features well-preserved ridge and furrow earthworks, that are remnants of historic agricultural practices, and contribute to the setting of the conservation area, Brinklow Castle (a Norman scheduled monument), and the nearby grouping of historic farmsteads and agricultural buildings.

4.51 It suggests limiting development in the Eastern field while noting the need to access the site from that side saying development should be *restricted in the eastern field to the greatest extent possible*.

4.52 The Ecological constraints assessment identifies that the site is located within the Impact Risk Zone IRZ associated with Combe Pool SSSI and Brandon Marsh SSSI. It is also adjacent to the River Avon and Tributaries Local Wildlife Site (LWS), which comprises a narrow watercourse and banks which runs down the Eastern side from an area of semi-improved natural grassland to the Southern tip of the site, although I also noticed some evidence that the stream may once have continued along the boundary of the site with Heath Lane where water appeared to run into the watercourse which then continues down Heath Lane away from the site towards the Avon.



Photo 5: Drainage Ditch along Site 315 boundary

4.53 On my visit to Brinklow I observed the site from the Norman Castle mound. It would appear that some of the development on the South of the Eastern field would be visible beyond the existing farmstead.



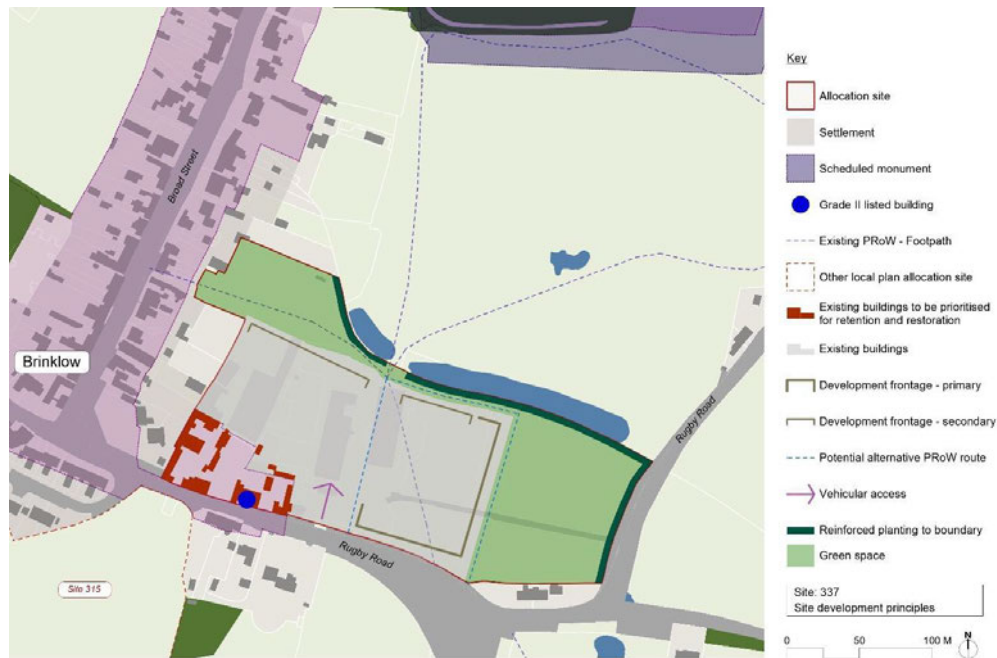
Photo 6: View from Norman Castle towards Site 315/337

a. Allocated Brinklow Site 337

4.54 Site 337 includes the farmsteads of West Farm and Home Farm, as well as surrounding pasture land. The farmsteads are a mix of historic farm buildings, including the listed Home Farm and behind them modern farm buildings on hard standing. These are surrounded by pasture land and a northern bank, formerly the Brinklow arm of the canal with ponds behind it dividing the site from the ridge and furrow fields beyond which lead to the base of Brinklow Castle.

4.55 The allocation allows for the development to: *where possible, retain, restore and re-purpose the historic agricultural buildings*. and for the existing PRoW to be either maintained or rerouted. I note that, unlike allocation 315 it would not include any pedestrian crossing of the Coventry Road.

4.56 It is to be noted that, apart from the heritage assessments, the existing assessments are for the two individual sites so do not consider any cumulative impacts.



4.57 The HEDNA describes site 5 (West Farm and surroundings) as:

Green Belt. Part of site within Conservation Area. Grade II listed buildings SW of site (5 and 7, Rugby Road) will require protection and appropriate buffers. Footpath crosses site. Site discussed in previous landscape study - Landscape Sensitivity - High. Part brownfield. Adjacent to and partly within settlement boundary. Further analysis needed.

4.58 The HEDNA describes site 90 (Home Farm and surroundings) as:

Largely-Green Belt site. Residential uses on 3 sides. Site lies adjacent to existing Conservation Area. Northern part of site assessing in past landscape study as Landscape Sensitivity High. Site abuts an area of Priority Habitat to its west - Traditional Orchard - an appropriate buffer may be required to mitigate impact. Site contains a high proportion of brownfield land and is well related to village.

4.59 Of site 5 the landscape sensitivity assessment notes that:

The site is within the Brinklow Conservation Area and contains a Grade II listed farmhouse. It is possible that the rear of the site would have views to the Church and Bailey and Motte. The rural approach to the village on Rugby Road is identified in the Conservation Area appraisal

4.60 It also notes that:

There is a public right of way which runs from Rugby Road in an approximate northerly direction through the site which may have some recreational value.

4.61 Of site 90 it notes:

The site has limited landscape value, however contains a public right of way, is within the Brinklow Conservation Area, adjacent to a Grade II listed farmhouse.

4.62 It also says:

The site is within the Brinklow Conservation Area and buildings on the rugby Road frontage provide an attractive approach to the village and are identified as a key view in the Brinklow Neighbourhood Plan.

4.63 It notes that:

The site has some value in terms contribution to the Brinklow Conservation Area, and relationship to the Grade II listed building on the adjacent property.



Photo 7: Home Farm Entrance

4.64 The heritage assessment details the Grade II listed farmhouse and the role of the surrounding buildings within the conservation area as well as views from the Castle.



Photo 8: West Farm Listed Buildings

4.65 It identifies possible impacts as:

Loss of historic agricultural buildings, features and spaces, including the farmhouse, its associated working buildings, boundaries, and yards. In turn, dilution of the character of the conservation area, and fragmentation of the surviving group of traditional agricultural buildings which form its south-eastern gateway.

Erosion of the farmsteads', and conservation area's agricultural setting through loss (in part or in full) of open, pastoral lands in the east and northwest of the site, and the subtle ridge and furrow and embankment earthworks within.

Erosion of the agricultural setting of Brinklow Castle, through either overly prominent and/or poorly designed development visible in southerly views from its peak, or when travelling through the neighbouring field parcels via the public rights of way.

Erosion of the conservation area's special character and appearance through poor quality design and construction.

4.66 Although it also suggests sensitive design could mitigate impacts on historical buildings and the conservation area.

4.67 It goes on to suggest a sensitive approach which restricts redevelopment to the existing modern industrial buildings and preserves (shown in blue on their map and identified as on lower heritage value) and meanwhile enhancing the surrounding area, including preserving the historic embankment.



4.68 The ecological assessment identifies that both site 5 and 90 are in the same Impact Risk Zone as site 315 and that the Brinklow Disused Canal Pool is adjacent to the site, which comprises two moderately species-rich water bodies situated within an area of cattle pastures, which are remnants of one of the original meanders of the Oxford Canal. Further evidence of that meander can be found further north of Brinklow.



Photo 9: Ponds on disused canal route from Site 337 towards Castle

4.69 The ecological survey refers to two ponds although on my site visit they appeared to be joined. I noted that the embankment and vegetation currently acted as a boundary between the site and the ponds which could mitigate any run off into the ponds.

4.70 I noted on my site visit that the proposed entrance to the site is through the narrow entrance to West Farm. The entrance is bounded by farm buildings which form an important part of the entrance to the village, but which also limit visibility at the entrance particularly looking east where the buildings project further into the road. For cars travelling East on the B4455 the entrance is also largely concealed.

4.71 On my visit I also viewed the site from the high point of the Norman Castle (See Photo 6). The pasture area can clearly be seen from the mound between the white house on the corner of the B4455 and the farmhouses. It is likely that even with the embankment this would create a prominent feature in the landscape. Notably the mound currently enjoys uninterrupted open views of the countryside in almost all directions. Development on the field north of the farms would be shielded by trees, (although that cannot be guaranteed into the future). However it would have less impact as the view is currently of farm buildings.

d. Commentary on Sites

4.72 I am not convinced based on my assessment of need and supply that either site is needed and it would be better to direct housing towards brownfield sites in Rugby and through the duty to cooperate with Coventry.

4.73 I am also not convinced that the increase in the size of the village is proportionate to its current size or that it has been shown that the facilities in the village are adequate for the additional population, or can be made so. In particular they would lead to more children being bused to school.

4.74 I accept that the infill site promoted in the Neighbourhood Plan could play an important role in meeting specific needs in the village, especially for affordable housing, and should be specifically allocated in the Rugby plan.

4.75 Having viewed the two allocated sites I would be particularly concerned about the larger development on Site 315. It would encroach significantly into the Green Belt with no clear boundary.

4.76 There is currently no transport assessment but I would be concerned about the volume of traffic that would be generated. In the wider sense this would lead to additional commuting into Coventry and rugby, more locally it would add additional traffic and turning movements on a busy road (B4455) where there is evidence of accident clusters, as well as increasing traffic on Heath Lane.

4.77 It would to some extent be visible from the historic mound. It would also be adjacent to a sensitive waterway. It would inevitably damage some of the historic ridge and furrow field patterns and it would impact on the amenity of the ProW which currently enjoys open countryside view.

4.78 In terms of Site 337, I consider that the sites could provide some housing on the areas of hardstanding with modern farm buildings, and that this approach could enhance the setting of those historic buildings, provided they were sensitively designed.

4.79 I agree with the heritage assessment that other areas of the site should not be developed and those should be removed from the allocation so that the map only includes the blue area identified in the heritage assessment.

4.80 This would avoid the most detrimental impact to the views from the Norman Castle mound (as well as the fields between the mound and the site) taking account of its setting in line with NPPF Para 213²⁴. It would also ensure the canal ridge was retained and development was separated from the sensitive ponds beyond it.

4.81 This would also be more consistent with the site's sensitive location next to the conservation area.

4.82 What would be the undeveloped area currently looks unkempt, mainly because of farm equipment left on the pasture land. That would no longer be there and I see no further work needed to improve that land.

4.83 This would provide some housing but the allocation would need to be reduced to reflect the reduced size of the site.

4.84 It would also reduce the pressure from traffic generated at the site on the road network. I would be particularly concerned about significant amount of traffic exiting the narrow entrance with poor visibility as currently identified on the Plan. Further examination of access should be undertaken but the entrance to the hardstanding at West Farm should in my view be retained for those houses, and the Home Farm entrance only be used for the housing behind that site. The map in the Plan should be amended in this regard.

4.85 In effect I would suggest site 315 is removed from the plan and site 337 is either removed or limited to the area of hard standing with existing farm buildings.

²⁴ Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Appendix 1: Coventry Supply Analysis for KOGG

3.2 Supply

2.2.1 The components of housing supply are set out in Table 6.1 of the Plan. These are based on the Table 5 of the HELAA (Nov 2024). Table 6 of the HELAA removes those dwellings completed up 30 Sept 2024 and this leaves 23,827 still to be built. This obviously does not include those sites which are only Safeguarded in the Plan (In Policy GB2).

Table 6.1 Components of housing supply 2021-2041

Housing Land Supply Components (data to 30/9/24)	Number of Homes
Past net completions	7,666
Committed supply	13,975
Remaining allocations (2017 Local Plan)	2,733
Proposed new site allocations (local plan review)	3,503
Other identified sites (HELAA)	816
Windfall allowance	2,800
Total	31,493

2.2.2 Table 6.2 includes a list of new sites allocated for development in the Plan, which amount in total to 15,934 units. Since some of these include existing consents it is not easy to correlate this with Table 6.1.

2.2.3 Table 6 of the HELAA, shows the total supply excluding completions showing there would be an on-going capacity of 23,827 (as of 30 Sept 2024).

2.2.4 The HELAA includes a list of all sites identified, including those discounted for various reasons. I have assumed the calculations in the HELAA are correct.

2.2.5 However, I now consider three specific aspects which could increase that supply.

2.2.6 The first is densities, the second windfalls, the third student accommodation.

a. Densities

2.2.7 The density assumptions are set out in Para 3.44 of the HELAA. Where densities are not informed by a planning application these are based on the densities in either

the existing plan or the emerging plan. Policy H9 of the existing Local Plan specifies minimum densities of 200 dpa inside the ring road, 35 dpa outside and 30 dpa on greenfield sites.

2.2.8 Policy H9 in the Regulation 18 Plan increases those densities to:

- Greenfield sites - 35 dwellings per hectare (net).
- Brownfield sites 45 dwellings per hectare (net).
- Sites within the City Centre Transition Zone 125 dwellings per hectare (net).
- Development within the defined City Centre boundary 250 dwellings per hectare (net).

2.2.9 The introduction of the 'transition zone' is, we are told to avoid a sharp difference at the City Centre boundary and is informed, as are the higher density figures, by the Residential Density Study of Oct 2024, which concluded that densities from 2017-2023 had often exceeded the minimum in H9.

2.2.10 The higher densities will have been partly because of the welcome H9 wording, maintained in the new Plan, that '*Residential development, including conversions, must make the most effective and efficient use of land.*' It will also result from the natural incentive to maximise the profitability of a development.

2.2.11 In coming to a view on the density of sites without a planning application the SHELAA relies on the capacity assumptions of the two plans. It is not entirely clear how the plan to be used on a particular site was decided, and it may well be that sites identified under the previous plan could still be built at densities consistent with the new plan.

2.2.12 A further intervention was where site capacity '*did not align with the site calculations*'. Here officers assessed capacity with known constraints and local site characteristics. The wording suggests this was mainly sites which were unlikely to meet the minimum density requirement for justifiable reasons.

2.2.13 What is clear from this is that there may well be sites, particularly in the urban core, which exceed the minimum densities, and so could provide additional capacity.

2.2.14 This, however, is not easy to quantify (without examining each site in detail). The new H9 certainly represents a welcome update of the Policy, provided it is fully informed by strong design criteria.

2.2.15 I conclude that there may be additional capacity from density under-estimates, but it is hard to quantify that.

b. Windfalls

2.2.16 The windfall allowance is for an additional 200 dpa, accounting for 2800 dwellings over the plan period. These start from 2027/2028 because windfalls prior to that are assumed to be in the system, as is usual.

2.2.17 The evidence of windfalls is necessarily informed by historic trends, as future windfalls are by their nature unknown.

2.2.18 However, it is also worth noting that there are a number of factors which would facilitate future windfalls, including the change to rules on usage-changes, city-centre and retail changes.

2.2.19 The introduction of the 'Transitional Zone' may well also increase windfall yields as it would allow higher density windfalls in that area.

2.2.20 Indeed, the dynamics of windfall supply is acknowledged in the HELAA (Para 3.54-3.55):

While every effort is made to identify development sites as part of the Local Planning Authority's desktop process, in an urban area the size of Coventry, there will be a continual supply of land and buildings reaching the end of their useful life in their current use in the short, medium and long term that the Local Authority wouldn't be able to identify or predict. This might result in simply changing the use that could include the whole site or part of the site, such as an upper floor(s) above a commercial premises or shop or subdivision of existing houses.

Sites which come forward as permitted development change of use are also effectively windfall sites where these have not previously been identified.

2.2.21 There may even be sites that the Council is already aware of but cannot currently identify as allocations²⁵. One example in the HELAA is the inner city site at Croft Road/Spon Street (HELAA Site Ref: STM-016-24) which is currently used for leisure purposes.

2.2.22 This was discounted in the HELAA not because it was unsuitable but 'due to lack of submitted information as part of call for sites process'. With an assessed capacity of 725 it could provide a significant addition to the housing supply, whether as a mixed use or wholly housing site.

2.2.23 There is certainly qualitative evidence for future windfalls, but the best way to estimate the quantity is to consider historic trends as the current NPPF requires in

²⁵ This problem was recently highlighted at the Shropshire Plan Examination, where sites were identified as potential windfalls which could not be allocated, and while this showed the potential for further windfalls, questions were raised as to why they were not allocated.

Para 74²⁶. This would include both small and large sites, as explained in the NPPF Glossary²⁷.

2.2.24 Table 4 of the HELAA sets out the windfall position over the last 3 years, both consents and completions. It is generally accepted that completions are a better measure as this allows for failure of permissions.

Table 4 Completions and planning consents on windfall sites 2021-24

Monitoring year	Homes consented			Homes completed		
	Resi	PBSA	Total	Resi	PBSA	Total
2021/22	344	7	351	224	761	985
2022/23	662	637	1,299	361	673	1,034
2023/24	762	805	1,567	572	-13	559
Total	1,768	1,449	3,217	1,157	1,421	2,578
Average p/a	589	483	1,072	386	474	859

'Resi' = Residential. All figures are net. Communal accommodation is included as a 'dwelling equivalent' figure derived from the Government's housing delivery test, which converts additional bedrooms to equivalent dwellings using the ratios: 2.5:1 for PBSA and 1.8:1 for other communal accommodation such as HMOs and care homes.

2.2.25 This period is relatively short (5 or 10 years is often used) and no figures are given for the preceding years. The Annual Monitoring Reports include figures for 2017-2021 (Set out in Table 4), but the AMR figures for both 2021/22 (272) and 2022/23 (393) are slightly higher than the HELAA. This, the Council has told us, is because the AMR used estimates that were later reduced downwards.

2.2.26 The previous AMR windfall figures are set out in Table 4 below.

AMR	Windfalls Delivered	PBSA
2020/21	58	16
2019/20	670	332
2018/19	451	820
2017/18	688	0

Table 4: AMR Windfall and PBSA evidence 2017-2021

²⁶ Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area

²⁷ **Windfall sites:** Sites not specifically identified in the development plan.

2.2.27 The 2020/21 year is clearly as aberration, probably because of the pandemic, and the following 2 years may also have been impacted by the ensuing economic downturn. However, taking an average of the six year's completions, and excluding 2020/21, gives a revised average of 494 dpa, although this may be slightly less if the final figures are used for 2017-2020.

2.2.28 Leaving aside the issue of Student Accommodation, this suggests to me that the average of 386 dpa for residential dwellings in the HELAA is overly pessimistic and the prospect of windfalls is much rosier. Indeed, the authors themselves admit that empirical evidence confirms the actual figure is much higher (Para 3.75²⁸).

2.2.29 The HELAA's justification for the choice of the 200 dpa figure (Para 3.76) is that this gives leeway for permissions to lapse or implementation be delayed. I cannot see the justification for this. The former issue is accounted for with the use of completions and the latter would have a diminishing impact as the plan progressed.

2.2.30 This is especially true since, while the Plan as written does not explicitly encourage windfall development, Policy H3 (similar to the existing plan) sets out criteria for judging unallocated housing sites which would continue to allow for windfalls as long as they are in line with the Plan's policy goals.

2.2.31 This is further underpinned by Para 73d of the NPPF which requires authorities to support the development of windfall sites.²⁹

2.2.32 In my view, it would be reasonable, discounting the pandemic year, to allow for 400 dpa to come forward as windfalls. This would double the allowance from 2,800 to 5,600 over the Plan period.

2.2.33 It can be anticipated that there would be objections to this on behalf of developers, who routinely complain about an over-reliance on windfalls and say such an approach is no longer plan-led.

2.2.34 However, even when adding this capacity to the total, allocated sites would still account for approximately 84% of supply, (79% if one excludes completions to 30 Sept 2024).

2.2.35 Moreover, Policy H3 seeks to ensure all planning permissions are determined using principles in line with the plan so the Plan-led approach would still apply to windfalls.

²⁸ 'Although Coventry's windfall allowance has been set at 200 dwellings per year, empirical evidence confirms the actual figure is much higher.'

²⁹ support the development of windfall sites through their policies and decisions - giving great weight to the benefits of using suitable sites within existing settlements for homes.

2.2.36 And, even if that were not the case, reducing the windfall allowance would not reduce the incidence of windfalls, so in practice they do not make the Plan any less Plan-led.

c. Student Accommodation

2.2.37 The third issue is student accommodation and the extent to which it might contribute to housing supply.

2.2.38 In terms of Purpose-Built Student Accommodation (PBSA) the HELAA identifies (para 3.82) a supply of 6,918 dwelling equivalents, of which 4,218 are previous completions and 2,700 future completions.

2.2.39 Of the PBSA completions up to 30 Sept 2024, 1,421 were on windfall sites according to Table 4 of the HELAA (474 per annum), which suggests 33% of the total PBSA completions.

2.2.40 Going forward, it is not possible from the HELAA information to fully identify the 2,700 future completions, so I assume those are all on allocated sites. The future windfall provision is solely based on residential windfall figures.

2.2.41 In other words, one might expect further windfalls to come forward as PBSAs. At a continued average of 400 a year, this would add 2,800 homes to the supply. Using the 2.5:1 ratio in the HELAA this would equate to 7,000 beds, 13,750 beds when added to the identified future allocated sites. At a lower average of 200 a year it would amount to 1,400 homes extra or 10,250 beds in total.

2.2.42 I note that two of the discounted HELAA sites were for student accommodation, CEL House (Site Ref: WES-003-24) and Spectra House, Westwood Way and 8 Torwood Close (Site Ref: WES-008-24). Both are close to Warwick University but on existing industrial sites. Between them they would accommodate 1,000 beds which suggests there is potential for PBSA windfalls to come forwards subject to planning constraints.

2.2.43 The evidence of need for addition PSBA accommodation in Coventry is also underlined in the recent Progress House appeal decision³⁰, which states:

The evidence before me indicates that there is limited purpose-built student accommodation within easy reach of Warwick University. In addition, the Council's emerging Homes in Multiple Occupation (HMO) Development Plan Document highlights issues that have occurred owing to the number of HMOs in the city and identifies that a large proportion of HMOs are occupied by students. Therefore, the development

³⁰ Appeal Decision 8 March 2024 Appeal Ref: APP/U4610/W/23/3328984, Progress House, Westwood Way, Coventry CV4 8JQ, Para 25

would seek to address these points. In consequence, I am persuaded that there is sufficient need for the appeal scheme.

2.2.44 This is underlined in Policy H10 (2) where there is a positive approach to providing further student accommodation where need is demonstrated (presumably on additional i.e. windfall sites).

2.2.45 In terms of the number of students who could potentially live in new PBSA accommodation, HESA reports 12,305 students at Coventry University and 7765 at Warwick University lived in 2023 in ‘Other Rented Accommodation’, a total of 20,070(See Appendix 1)³¹.

2.2.46 Some Warwick University students may live in Leamington Spa or other nearby towns, but it is reasonable to assume most live in Coventry.

2.2.47 Another 3,825 are identified as in ‘other’ accommodation and 2,155 not known and 6,580 are in the parental/guardian home (See Appendix 1)³².

2.2.48 One would expect that the majority of students who live in new PBSAs would otherwise live in rented accommodation in Coventry, although a few may come from the other categories. Equally, one has to allow for the fact that some students will prefer to live in rented accommodation.

2.2.49 The new PBSA provision will also not all replace rented accommodation if student number increase. It may also be impacted by the current downturn in International Student numbers.

2.2.50 Overall, it seems to me there is likely to remain an appetite for such schemes, which will facilitate windfall PBSA provision. However, over time as more accommodation is built that may reduce, especially if student numbers remain static.

2.2.51 For the purposes of the Plan and on the evidence currently available, a windfall PBSA allowance of 200 dpa would seem to me reasonable.

d. Other Supply Issues

2.2.52 I have not considered any other aspects of supply which might increase capacity, for example reducing empty homes. It may be there is some more capacity that could be identified but I have no evidence to suggest it would have a major impact.

³¹ The data on where students live from HESA Table 57: <https://www.hesa.ac.uk/data-and-analysis/students/table-57>

³² The data on where students live from HESA Table 57: <https://www.hesa.ac.uk/data-and-analysis/students/table-57>

e. Conclusions on supply

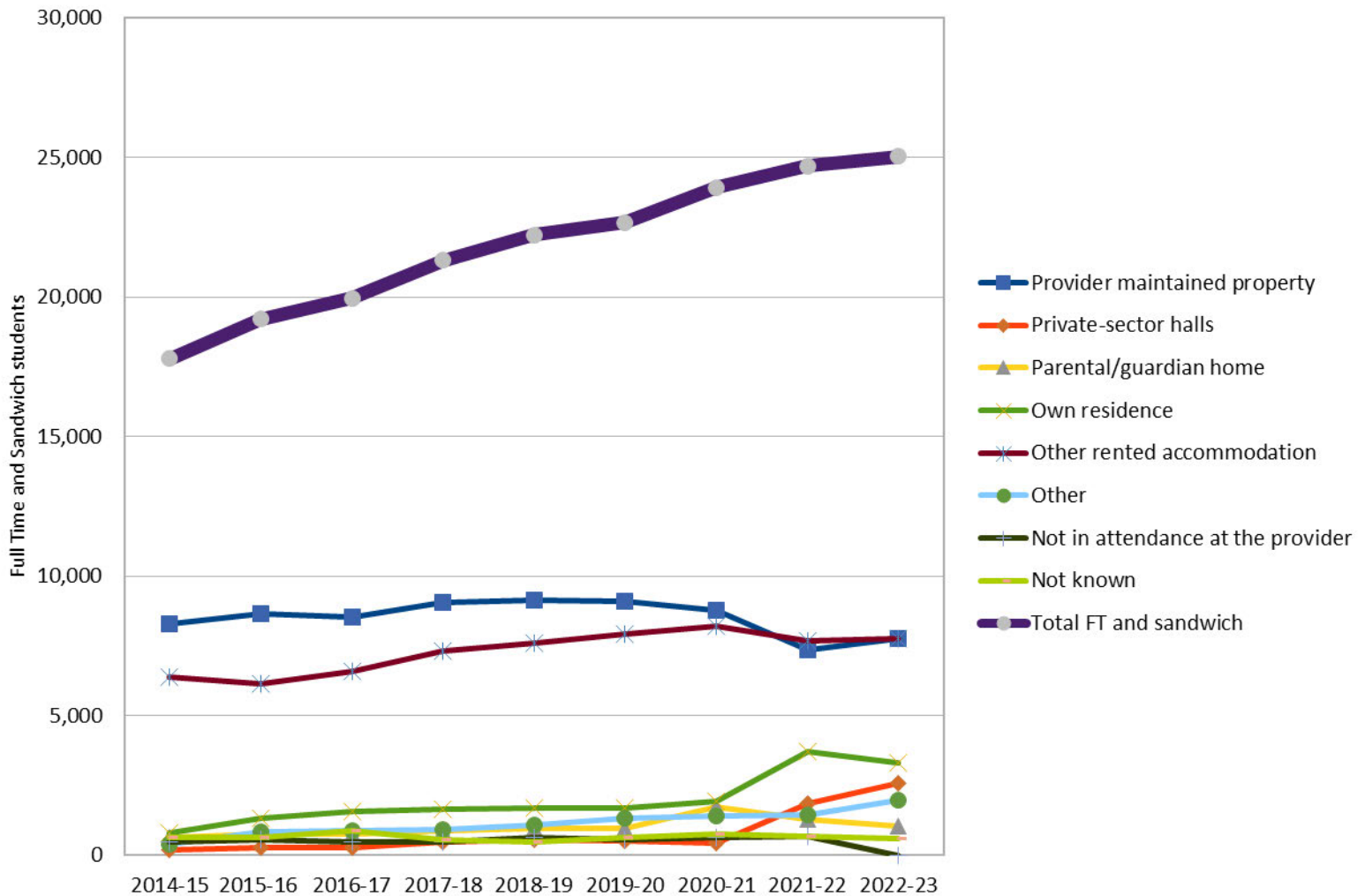
2.2.53 I have not examined all aspects of Supply but it seems to me there is likely to be some additional capacity from increased density (above the Plan's minimum) and there may be other increases from policies, such as reducing vacancies but these are hard to quantify.

2.2.54 Based on the qualitative and quantitative (historic trends) evidence I consider a windfall allowance of 400 dpa fulfils the NPPF test of compelling evidence. This would add 2,800 dwellings to the supply over the Plan Period.

2.2.55 I also consider there is both qualitative and quantitative evidence of future PBSA windfalls and a reasonable allowance would be 200 dwelling equivalents per annum, adding a further 1,400 dwellings to the supply over the Plan Period (i.e. houses released from being student accommodation.)

Appendix 2: Where Students Live: Data from HESA³³

Univ of Warwick - Where full time & Sandwich students live



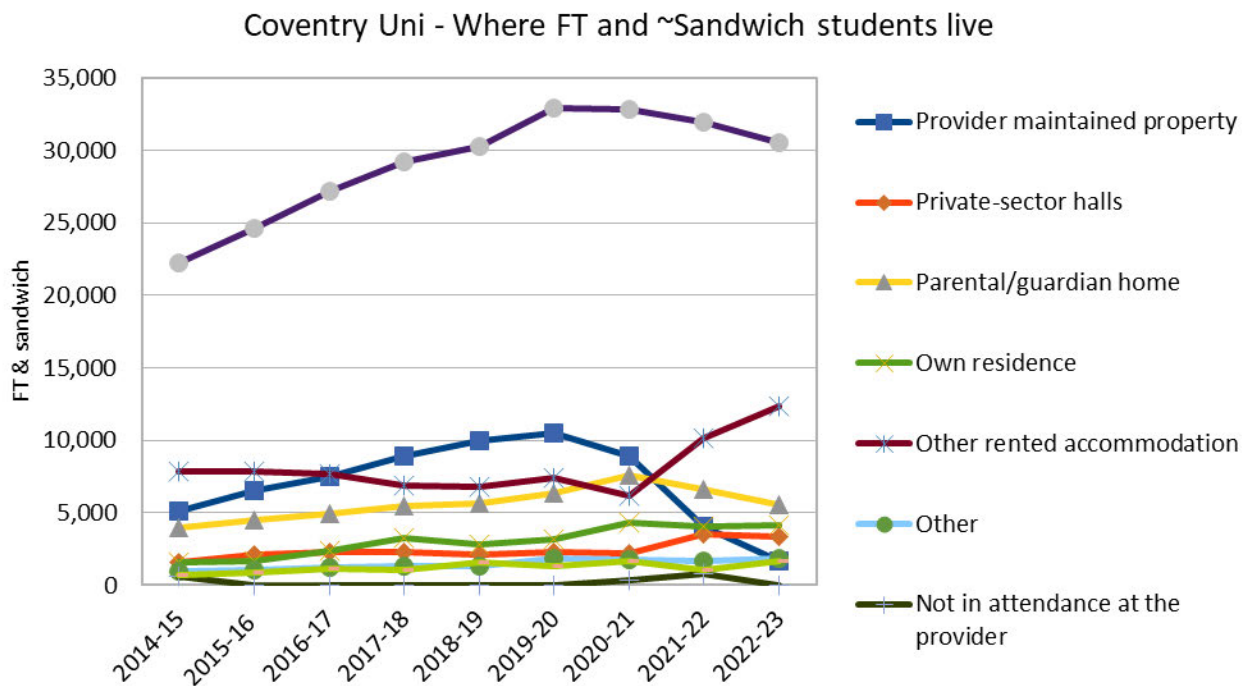
Some observations, at Warwick University

Over the 9 years of this data, total numbers of full time plus Sandwich students have increased by about 10,000

This breaks down into an increase as follows

³³ From <https://www.hesa.ac.uk/support/definitions/students>

Location	Change, approx. over 9 years	
parental/guardian home		‘+395
Not known		-35
Not in attendance	[not available 190 over 8 yrs to 21/22]	
Other		‘+1600
Other rented		‘+1390
Own residence		‘+2510
Private sector halls		‘+2370
Provider maintained property		-520
	-555	



Location	Change over 9 years,	
parental/guardian home		‘+1585
Not known		‘+1005
Not in attendance	Unknown [160 over 8 years]	
Other		‘+855
Other rented		‘+4460
Own residence		‘+2600
Private sector halls		‘+1780
Provider maintained property		‘-3390

Appendix 3: E-mail from [REDACTED]

[REDACTED]

Good afternoon [REDACTED]

Please see below our response to your enquiry:

Good morning [REDACTED]

Thank you for asking us for our opinion regarding the proposed housing development, and the impact this would have on the surgery.

We will not comment on any impact on the infrastructure, roads, schools etc as this is not in our remit.

400 houses would equate to the potential for a further 800-1600 patients. This would push our practice number from circa 8000 to 9000-9500 patients.

While we have sufficient GP's to manage extra patients (based on the RCGP recommendations of GP's per patient), our current building has insufficient space to accommodate an increase in numbers of this magnitude. The car parking is inadequate for the current demand as it is. With the lack of available estate funding through NHS England/ICB to build a new building with larger parking area, we cannot foresee a change in this regard and so we would not support a large-scale development in Brinklow.

Kind regards

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

Appendix 4: Landscape Appraisal of Land West of Lutterworth Road, Brinklow

Attached Separately