



## LIVING SPACE

Preferred Option Consultation  
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19<sup>th</sup> May 2025

### **RE: LIVING SPACE HOUSE REPRESENTATIONS ON RUGBY BOROUGH LOCAL PLAN PREFERRED OPTIONS CONSULTATION (REGULATION 18)**

This document comprises Living Space Housing's (LSH) representations to the Regulation 18 ("Reg. 18") version of the Rugby Local Plan Review consultation. These have been prepared in relation to our land interest at Ryton-on-Dunsmore, identified as Land to the West of High Street, Ryton-on-Dunsmore. We therefore submit the following representations to the Rugby Authorities, Reg. 18 Consultation, May 2025.

#### **1. The site – Land to the West of High Street, Ryton-on-Dunsmore ("Ryton")**

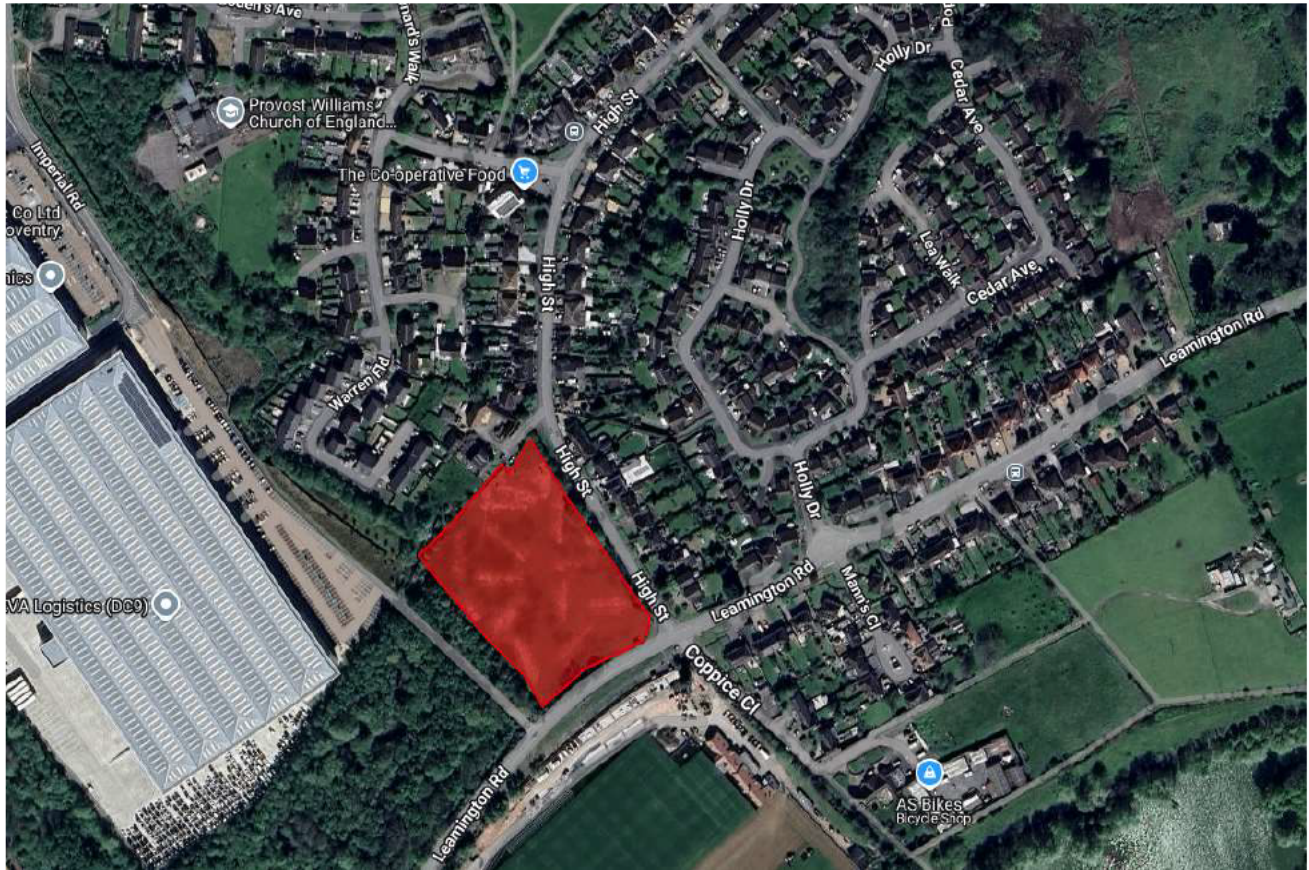
- 1.1 Living Space Housing have an interest in Land to the West of High Street, located within the village Ryton-on-Dunsmore ("Ryton").
- 1.2 The site is located to the south-west of the village and civil parish of Ryton-on-Dunsmore ("Ryton") and comprises approximately 1.2ha of undeveloped Greenfield land, currently used as a grazing paddock. Ryton Village Centre is located approximately 550m north of the parcel of land. It is bound to the north by residential dwellings, the east by High Street, the south by Leamington Road (A445), and the west by a rear access route to the adjacent industrial units.
- 1.3 The site (known locally as 'Lambs Field') has a good level of accessibility to local bus services, with three bus stops situated along the Leamington Road and High Street. This existing bus route [the number 25 bus service] provides connections from Ryton towards Rugby and Coventry. This service provides future and current residents and visitors alternative sustainable travel options to nearby towns for employment and leisure opportunities.
- 1.4 The site is wholly in Flood Zone 1, does not fall within the Conservation Area, nor is it within the Green Belt, and is free from Tree Preservation Orders (TPOs). Therefore, it is a completely unconstrained site with limited planning concerns.
- 1.5 There is a Public Right of Way (PRoW) through the site.

#### **2. Settlement Context – Ryton-on-Dunsmore**

- 2.1 Ryton-on-Dunsmore is considered as a rural settlement within the Local Plan and Neighbourhood Plan. Located approximately 7km south-east of the centre of Coventry and 12km west of the centre of Rugby, the village has been identified as an accessible location, with access to services and facilities, as well as sustainable modes of transport.
- 2.2 The Village consists of a variety of existing services and facilities readily available to residents and visitors of Ryton. These consist of a Village Hall, a Primary School [Provost Williams Church of England Primary School], a Post Office, Convenience Stores, Leisure Centre/recreational field [Sport Connexion Leisure Club and Venue], take-away venues, and public houses.

2.3 Figure I demonstrates the location of the land parcel, Land to the West of High Street, and North of Leamington Road.

**Figure I: Location of Land to the West of High Street**



### **3. Planning and Policy Background**

- 3.1 The Development Plan comprises both the Rugby Borough Local Plan 2011 – 2031 (“the Local Plan”) [adopted June 2019], and the Ryton-on-Dunsmore Neighbourhood Development Plan 2018 – 2031 (“the Neighbourhood Plan”) [adopted July 2021].
- 3.2 The Rugby Borough Local Plan was adopted in June 2019. It sets out the Councils strategies and policies covering the period of 2011 - 2031. The current timetable for the remainder of the review is as follows:
- Preferred options consultation (*Regulation 18*) - March 2025 - 19th May 2025
  - Pre-submission consultation (*Regulation 19*) - January 2026
  - Submission for Examination - June 2026
  - Adoption - By June 2027
- 3.3 The Revised NPPF was published in December 2024 and sets out the Government’s planning policies for England and how they are expected to be applied in decision-making and plan making. It does not form part of the statutory development plan but does provide significant guidance for Local Planning Authorities, establishing an up to date and comprehensive expression of national planning policy.
- 3.4 At a high level, the adopted and emerging local plan are consistent with the NPPF guidance in seeking to deliver sustainable development and recognising the positive impact of the delivery of rural housing in rural settlements.

- 3.5 The site currently has a live planning application (ref: R22/1120) for 37 dwellings, submitted by Living Space Housing. The application was submitted for appeal via written representations in January 2025 and is awaiting final decision.
- 3.6 The site was previously identified within the made Neighbourhood Plan, through the Site Sustainability Assessment, as a safeguarded site for development (ref: Site K: Lamb's Field).
- 3.7 Policy H2: Safeguarded Site within the Neighbourhood Plan specifically concerns the site, identifying it as being safeguarded for future residential development where one of the following two circumstances exists:
- a) *It is required to remediate a substantial shortfall in the supply of housing land due to the failure of the Leamington Road (Coventry City Training Ground) Site (allocated under Policy H1 in this Plan and Policy DS3 in the Rugby Local Plan) to deliver the anticipated scale of development required. Any assessment as to whether or not the site has failed can only be made after the first five years from the date of Local Plan adoption*
- or:
- b) *It becomes necessary to provide for additional homes in the Parish in accordance with any new development plan document that replaces the 2019 Rugby Local Plan or any updated version of this Neighbourhood Plan.*
- 3.8 In this circumstance, part a) of Policy H2 is engaged as there is a substantial shortfall of housing in Ryton due to the failure of the Leamington Road site and subsequent deallocation of the site [site ID: 300] within this emerging Local Plan. Therefore, the need for development of the site has been triggered by virtue of the safeguarding policy in the Neighbourhood Plan. Development of this site can be deemed suitable and available for residential development to come forward on the allocated land.

#### **4. RUGBY PREFERRED OPTIONS: Policy Options**

- 4.1 The following provides Living Space Housing's general comments regarding proposed policies within the Regulation 18 Preferred Options Rugby Local Plan, as well as comments relating to our interest to Land at High Street, Ryton-on-Dunsmore. Living Space generally support the Preferred Options policies but provide specific comments that the Council can address in order to ensure that the Plan can be found as sound.

##### ***Q1: To what extent do you agree with the selection of Objectives?***

- 4.2 Living Space Housing consider the Objectives put forward within the Rugby Local Plan to be appropriate, in principle.

##### ***Q3/Q4: To what extent do you agree with the more dispersed overall spatial strategy for new homes, and why?***

- 4.3 Living Space Housing agree with the overall spatial strategy for new homes within the Local Plan. The focus on small and medium sites and housebuilders is an aspect within the strategy that Living Space Housing supports, being an SME housebuilder. We understand the need for varied site sizes to come forward in order to improve the UK wide supply and growth of housing.
- 4.4 The identification within the Settlement Hierarchy of Ryton-on-Dunsmore as a Main Rural Settlement which can accommodate and support further housing growth is supported by Living Space Housing.

#### **Policy S6: Residential Site Allocation – Ryton-on-Dunsmore**

- 4.5 Policy S6 within the emerging Rugby Local Plan identifies Land to the West of High Street, Ryton-on-Dunsmore as an allocation for residential development.
- 4.6 Living Space Housing are in complete support of the allocation of Land to the West of High Street, Ryton-on-Dunsmore for residential development within the emerging Local Plan [Site ID: 100] and as a location for growth.

- 4.7 Ryton is a Main Rural Settlement on the edge of Coventry and is capable of supporting further housing growth. Land at High Street is available and deliverable through the Local Plan period and the delivery of 37 dwellings on this site should be included within the housing allocations and trajectory for the Local Plan.

The live application has demonstrated that there are no technical issues relating to this site which would result in it not being brought forward for, confirming that it is suitable for residential development. The application received “no objection” (subject to suitable planning conditions and obligations where applicable) from Warwickshire County Council (WCC) Highways; WCC as the Lead Local Flood Authority (LLFA); WCC Archaeology; WCC Ecology; and Rugby BC Trees and Landscape.

- 4.8 The Preferred Options assigns a figure of 35 dwellings to the allocation. However, LSH have undertaken a viability study as part of the live planning application for the site, which was completed by CBRE [see Appendix A]. The assessment determines that “a further reduction in the density of residential units below 37no. (i.e., the Proposed Development) has a significant impact on financial viability and therefore deliverability of the scheme”. While the site is allocated for 35 dwellings, the application has demonstrated that the site can suitably deliver 37 units and this is considered the optimal figure for ensuring the site remains viable. As such, LSH request that the allocation figure is uplifted to 37 dwellings.

**Q11: To what extent do you agree with the approach to reducing emissions and adapting to the effects of climate change?**

- 4.9 Living Space Housing agrees and supports the Objective of reducing emissions and improving the sustainability of homes but consider it would be onerous for planning policy to add another layer of regulation above and beyond the requirements of Building Regulations.

**Q17: To what extent do you agree with the document’s environmental policies?**

- 4.10 Living Space Housing supports the overall environmental policies, in principle.
- 4.11 Living Space supports the requirement for 10% Biodiversity Net Gain (BNG) to be either delivered on site, through off-site credits or through statutory biodiversity credits. This complies with National guidance for mandatory 10% BNG requirements outlined in Part 6 of the Environment Act 2021. Living Space Housing are supportive of the Councils’ reaction to this mandatory requirement, with the inclusion of reasonable options for off-site improvements for identified allocations that cannot adequately deliver on-site improvements.
- 4.12 Living Space Housing are not in full agreement of Policy EN5 Canopy Cover, which requires a minimum of 20% canopy coverage is applied to all major developments. Whilst it is agreed that tree planting on new developments attributes good design, climate improvements, and meeting mandatory Biodiversity Net Gains, in practical terms, trees can often create conflict between different statutory consultees, particularly Highways, due to management issues. Furthermore, requiring a minimum tree canopy cover would also be difficult to enforce post planning permission, particularly in private areas which are managed by occupiers.
- 4.13 Policy EN5 states that sites where a 20% canopy coverage cannot be achieved will be subject to negotiation with the Council for an alternative level of canopy cover, which is supported by Living Space Housing. A policy requiring a minimum canopy cover would create unnecessary pressures on design for public and private areas. This should therefore be a matter considered on a case-by-case basis further to in principle support for tree planning, rather than a specific coverage requirement being mandated, and this would be better addressed through a Supplementary Planning Document (SPD) or similar.

**Q19: To what extent do you agree with the document’s housing policies?**

- 4.14 Policy H1 is agreed and supported by Living Space Housing, requiring that new housing developments contribute towards meeting the identified local housing need. The Coventry and Warwickshire Housing & Economic Development Needs Assessment (HEDNA) (November 2022) evidence shows that Coventry and Warwickshire can be regarded as a coherent housing market area and functional economic market area.
- 4.15 Paragraph 62 of the NPPF 2024 details that strategic policies should be informed by a local housing need assessment. This demonstrates that it is important for the needs of housing market areas to be appropriately

addressed through the Local Plan review. Adoption of the HEDNA figure closely aligns with the governments aspirations to boost housing delivery in areas where it is needed. The HEDNA has clearly identified a specific housing need, which would be achievable within the proposed Plan period. Therefore, Living Space Housing consider the HEDNA figures suitable for adoption.

- 4.16 Living Space Housing agree that homes should be built to be future proof and agree with Policy H7 Housing Standards (a) requirement that *“all new dwellings shall, as a minimum, meet the Nationally Described Space Standards”*.
- 4.17 Policy H7 identifies that developments of 10 or more houses should provide 10% M4(3) units. As previously stated above in our response to Q11, policies requiring above and beyond Building Regulations should be flexible enough to ensure schemes remain viable and deliverable.

**Q21: To what extent do you agree with the document’s wellbeing policies?**

- 4.18 Living Space Housing supports the wellbeing policies within the draft Local Plan.
- 4.19 The application of Policy W2 for the provision of open space within developments of 10 or more dwellings accords with the national guidance outlined in Paragraph 103 of the NPPF 2024, which describes the need for high quality open spaces. Living Space Housing agrees with the inclusion of this policy for the requirement for open spaces within new developments.
- 4.20 Land to the West of High Street, Ryton proposes a sustainable, pedestrian-oriented, community focused environment where residents can engage in active, healthy lifestyles through the promotion of walkable greenspaces.

**Q23: To what extent do you agree with the document’s design policies?**

- 4.21 Living Space Housing agrees with the provision of Policy D1 Well-Designed Places to create attractive places that maintain high quality of design. Quality of design is embedded into Living Space Housing’s approach to all developments, as evidenced by our previous schemes.
- 4.22 Design Codes can provide a useful guide for developing site layouts and the detailed design of schemes. It should be acknowledged that Design Codes are to be used as guidance and should be flexible enough to be applicable on a site-by-site basis.
- 4.23 Furthermore, the NPPF now provides more emphasis on well-designed and “beautiful” places. For example, Paragraph 136 expresses that planning policies and decisions should ensure that new streets are tree-lined. Therefore, certain design aspirations are already defined within National Policy and do not need to be unnecessarily repeated.

**5. Conclusion**

Living Space Housing politely requests that these representations are taken into consideration. Land to the West of High Street, Ryton-on-Dunsmore is readily available and deliverable within the desired timeframe. Living Space Housing recommend that the Council include the site within the emerging plan as an allocation for residential development. Should any further points of clarification be required, please do not hesitate to contact me or my colleague Tamsin Almeida (talmeida@livingspacehousing.co.uk).

Yours Faithfully,

[Redacted Signature]

[Redacted Name]