

Preferred Option Consultation,  
 Development Strategy Team,  
 Town Hall,  
 Evreux Way  
 Rugby  
 CV21 2RR

By email only: [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) [Redacted]

19<sup>th</sup> May 2025

Dear sir/ madam

**RE: Representations to Rugby Borough Council Local Plan Review Preferred Options Consultation**

**By Davidsons and the Landowners of land south of Coventry Road, Long Lawford (Site ID: 316)**

Thank you for the opportunity for Davidsons to submit Representations to the current Local Plan review Preferred Options Consultation running until 19<sup>th</sup> May 2025.

Davidsons are a private, local medium sized housebuilder delivering circa 900 homes per year across the East and South Midlands. We pride ourselves on delivering high quality and well-designed homes that are different from the rest. This can be seen with the 350 homes delivered by Davidsons at Houlton, where we opened the site with an award winning street-scene and surrounding phases at the entrance that makes Houlton the success that it is.

These representations are made by Davidsons Developments Ltd jointly alongside the landowners of the Land at Long Lawford which is draft allocated for 400 homes under emerging Policy S6. Section 4 of this document outlines how the site is suitable, available and achievable and should continue through to adoption of the plan for delivery of much needed homes in this sustainable location.

We are wholly supportive of the draft allocation for Land at Long Lawford. These representations also make specific comments on various documents, separated into the following sections:

1. The Strategy for homes and residential allocations
2. Commentary on each policy, where appropriate
3. The Sustainability Assessment/ Rural sustainability study
4. Proposed site allocation at Long Lawford – accompanied by a Vision Document enclosed





## 1. The Strategy for Residential Allocations

Rugby BC have chosen a dispersed strategy, which avoids allocating very large sites. In the 4<sup>th</sup> March 2025 report to Cabinet in which the Local Plan draft was approved for consultation, Section 9 lists several reasons for the chosen strategy, each of which are copied out below in *red Italics*. We respond next to each with Davidsons response:

*By having a range of smaller sites, that will come forward quickly and offer opportunities for small to medium housebuilders, the borough can avoid an over reliance on large sites (i.e. having 'all eggs in one basket').*

We strongly agree with this. The slow pace of growth of South West Rugby SUE is evidence that large sites take much longer to deliver than anticipated, with the only large-scale site to have delivered homes in Rugby having been opened with an award winning street scene by Davidsons within the delivery of infrastructure by U&C as master developer. Sites up to 500 homes typically can achieve planning, start on site and deliver homes within 5 years, due to less onerous requirements for significant infrastructure. Regarding Policy S6 and Residential Allocation 316 at Long Lawford, Davidsons, a local small to medium housebuilder, will be able to deliver this site in the short term, with two outlets allowing quick absorption within 4 years after a start on site.

*While large urban extensions to Rugby town (Houlton, Eden Park and South West Rugby) are being delivered, a strategy that placed further infrastructure strain on the town was deemed unfavourable.*

We strongly agree with this. Should the 'Cosford and Newbold on Avon Site' come forward, it would need significant infrastructure upgrades within the nearest settlement (Rugby) however would still be a significant distance to those services, effectively being a new settlement itself. This is not sustainable placemaking and so the current strategy of dispersed deliverable sites in sustainable settlements that can benefit from a boost to investment is the most logical and beneficial to existing residents.

An consideration that is not often considered at planning level is the availability of infrastructure. With the increasing use of electricity for no gas building regs, heat pumps, PV and car charging, new homes need a lot more power than previously. With our experience building locally, we know that there is a 4-year waiting time on grid connections around Northampton for large scale extensions. Should the Cosford and Newbold site, or Lodge Farm, be considered for development, we would strongly question the availability of sufficient power connections to enable their delivery.

*A strategy focused on small and medium sites is likely to deliver proportionately more affordable housing more quickly.*

We strongly agree with this. Smaller sites typically have less infrastructure, allowing for a more viable site that can deliver its policy requirement.



*The large sites put forward have significant concerns relating to their traffic impacts and their ability to fund necessary infrastructure, thereby making their deliverability uncertain.*

We strongly agree with this. Smaller sites have less impact on the network, given traffic is less concentrated to specific areas. This allows these sites to be modelled quicker, requiring less off-site highway improvements to mitigate any impact (reducing disruption to the network) and this allows Warwickshire Highways to approve these schemes quicker, contributing to the delivery of homes.

*There are opportunities to utilise existing infrastructure in villages where school rolls are dwindling and to improve the range of facilities in villages, enhancing their sustainability.*

We strongly agree with this. Existing villages have dwindling primary school take up, struggling public houses and shops and limited access to healthcare infrastructure. Allocating growth and investment to these locations allow their long-term sustainability. Take proposed allocation 316 at Long Lawford for example, this can deliver a local shop and potential doctor's surgery which will significantly benefit existing as well as new residents. Further, the 400 homes will bring families and discretionary spending to the village, providing a much-needed boost to the school (currently with 20% spare capacity in places) and businesses in the village.

In conclusion, it is refreshing to see an authority take a realistic and actually deliverable approach to allocating the housing requirement in their area. Rugby BC have ensured that high quality homes for all will be delivered through the allocation of deliverable sites now in sustainable settlements that will benefit from investment,





## 2. Commentary on specific Policies

Whilst Davidsons are in general support of the majority of the policies outlined in the draft Local Plan, we comment below on specific policies where we either support or encourage the Council to review minor changes to enable a more deliverable and sound plan.

### **Policy S1 Settlement Hierarchy**

We strongly support the sensible approach to the scale of development being commensurate with the services and facilities of the settlements. Allocating a proportion of the growth to Main Rural Settlements in this plans allows for the long term sustainability of those settlements whilst bring forward deliverable sized sites which will contribution to meeting the housing needs over the short term.

### **Policy S2 Strategy for homes**

We agree with the approach to deliver 618 homes in line with the recently revised Standard Method (Dec 2024). We also agree with the proactive approach taken by the Council in adding a 9% buffer to this housing need to ensure choice and competition in the market and to ensure the 5-year housing land supply remains robust. Further, the new allocations totalling 3,338 homes under Policy S6 will contribute significantly to the shorter-term delivery of the total requirement of c.14,000 homes, given the deliverability of the selected sites with less strategic infrastructure requirements.

### **Policy S6 Residential allocations**

Davidsons are strongly in support of the allocation of these sites for development, namely site 316 at Long Lawford for 400 homes. As detailed in section 4 of these representations, this is a remarkably unconstrained site with a reputable local homebuilder able to deliver the homes upon adoption of the Local Plan. Allocating a single site in the village in the most accessible clockface location will allow the site to be delivered with minimum impact on the existing village whilst delivering much needed services such as a doctor's surgery, retail provision and affordable housing. Please refer to section 4 for further information.

### **Policy CL1 Net zero buildings**

Whilst we admire the aspirations of this policy, we question the deliverability of such a high bar of net zero for all new buildings. There is little evidence of development of any scale across the UK achieving this due to the complexities of supply chain economics, building methods and materials alongside availability of skilled labour which can deliver this requirement. It is seen as very likely that this policy could undermine the delivery of the c.14,000 homes that are required across the plan period, or at the very least cause significant viability issues which would lead to underdeliver of infrastructure and affordable housing.

Instead, we respectfully suggest that the ever-increasing requirements set out in the Building Regulations (noting Part L is regularly revised upwards) and Future Building Standards will lead the housebuilding industry to this standard in a considered timescale, to allow the complexities of the building process to change in sustainable steps over time.

At Davidsons, we deliver homes through a 'fabric first' approach, with larger cavities and more efficient materials which is then enhanced with power generation through PV panels and air source heat pumps.



Each home is always supplied with EV charging as standard, and storage for sustainable modes of transport such as push bikes.

Policy CL1 should be amended to ensure that the requirements are in line with current Building Regs (or otherwise updated) and should not go above and beyond.

#### **Policy EN4 Biodiversity net gain**

Davidsons are in support of achieving a minimum 10% net gain in Biodiversity Net Gain on all development sites and the cascading system for achieving this set out in the policy. Where development is near to a Local Wildlife Site, there is an opportunity to enhance this through symbiotic planting that creates marriage value between the two land parcels.

#### **Policy EN6 Flood Risk**

We agree that all development should mitigate its effect on flood zones. Davidsons do however question the need for sequential test on all applications, as this should be excluded from applications on allocated sites given a sequential test should be completed as part of the Local Plan evidence base. It would not be worthwhile assessing other sites sequentially around the same village from a purely flood risk perspective, when the allocated site will have been chosen due to a combination of all Site Assessment characteristics to be chosen as the most deliverable. A site with less surface water flood risk elsewhere around a settlement may fail in many other aspects when selecting a site for development, meaning it would not be suitable for development just on the basis of a lower area of surface water flooding on it which in any event can be mitigated.

Surface water can be entirely mitigated through onsite engineering such as SUDS features and the Council is encouraged to support emerging allocations that have demonstrated the technical deliverability of the allocation. This is the case for the emerging allocation at Long Lawford, where a drainage strategy has been provided even at this early stage, to provide assurance to the Council of the site's ability to adequately mitigate any surface water runoff.

#### **Policy H1 Housing Mix**

Whilst we appreciate the HEDNA 2022 identified a need across the borough and sets out a housing mix, we would suggest that this is not set out in the policy or supporting text of the emerging Local Plan. Reference should instead be made that proposals should have regard to the most recent HEDNA but that an element of flexibility is permitted when considering things such as commercial demand for certain unit sizes, specific settlements characteristics and also mixes that Registered Providers are willing to take. For example, to have 10% of market dwellings as 1-beds is not a viable option and there is not the demand for such a high percentage of this dwelling size. 0-5% is more realistic. It would also be useful for the HEDNA overall to provide a range of percentages within which to guide broad mixes.



## Policy H2 Affordable Housing

Davidsons support the delivery of affordable housing as a percentage of the total homes on new allocations. We do object however on the prescribed tenure split of these given 82% social rent is high compared to all other authorities and this will further decrease demand from Registered Social Landlords (RSLs) from purchasing the S106 homes. Affordable rent is typically in higher demand by RSL's and typically set at 70% of the total tenure split. We encourage the Council to take a flexible approach to this tenure split (as suggested under section 6.8) to ensure it does not unduly restrict housing delivery through viability issues or further decrease the appetite from RSL's to purchase S106 affordable homes. Tenures such a shared ownership and / or First Homes should also be considered, which is being used to great effect in delivering starter units across neighbouring authorities.

## Policy H7 Housing standards

Davidsons are comfortable with delivering homes to Category 2 of Part M4 of the Building Regulations. We have also delivered homes to Category 3, however usually only in cases where the council have an identified need for occupiers who require this. To require 10% of all dwellings to meet M4(3) standard will result in many homes being occupied by those not needing the full accessibility credentials of category 3. We would encourage the Council to amend this policy to state that a maximum of 5% of homes will be provided to Category 3 where it meets an identified need at the time of the application. This will ensure sites are more viable and homes are not provided to a specification that is not required by the majority of the market.

## Policy D1 Well-designed places

The Council can take comfort in the track record of Davidsons Homes in delivering well designed places and homes. As evidenced by the opening street-scene at Houlton, Davidsons pride themselves on delivering varied and interesting housing developments that respond to the local area. This will be the case for the proposed housing allocation at Long Lawford, where the Vision Document enclosed begins to set out the design aspirations here. We encourage any policy which reflects our design-based values.

## Davidsons opening streetscene at Houlton, Rugby





### 3. The Sustainability Assessment and Rural Sustainability Study

#### The Sustainability Assessment (SA)

Davidsons are in agreement with the methodology and results of the SA. Growth scenario 1 is a clear leader in most aspects, not that they should be equal weighted in the decision-making process.

The decision to omit the two new settlements / large sites is one for the council to continually monitor, however the risks that that would pose to the housing land supply are in Davidsons' view too great. The dispersed strategy outlined will result in more sales outlets and affordable housing being delivered in the short to medium term, given the ability for homebuilders to obtain planning permissions and deliver the required infrastructure that smaller scale sites require in much shorter timescales. More sales outlets across a wider geography of locations will enable quicker delivery and absorption of homes to the market, securing the authorities land supply.

The comment on engagement with Parish Councils mentioned under 7.1.4 is noted and, with regard to the proposed allocation at Long Lawford, Davidsons would carry out early engagement with the Parish when bringing forward our proposals.

#### Rural Sustainability Study

The study shows that Long Lawford has the most dwellings of all the Main Rural Settlements. However, it ranks as the 5<sup>th</sup> highest in terms of Settlement Rankings score.

We note the exceptional public transport score of 8, unrivalled by any other settlement. This is developed further by Stantec in the supporting Transport Technical Review and demonstrates the sustainability of the allocation of site 316 in its ability to allow future residents suitable public transport methods.

Whilst high and in the middle of all Main Rural Settlements, the overall score of Long Lawford could be higher through the provision of two services described as 'Essential' in the weighted scoring system – a Doctors surgery and Pharmacy. This is noticeably lacking in the largest village in Rugby Borough. By allocating Site 316 at Long Lawford for 400 homes, the Integrated Care Board has an opportunity to deliver this essential service alongside high quality homes. Should this site deliver the service, the score of Long Lawford would increase by 8 points, putting it as the third highest settlement.

Davidsons are therefore encouraged by the Council's ability to pair the delivery of its housing requirement with a delivery mechanism to unlock the final service that an already sustainable key settlement requires. As mentioned previously, this scale of infrastructure is capable of being delivered with reasonable sized sites such as the 400 homes proposed here, without hampering the sites delivery in a way that large scale urban extensions are hampered by their significant infrastructure requirements. This leads to more infrastructure and more homes being delivered together, faster.





#### 4. Proposed Policy S6 – Site 316 at Long Lawford

Davidsons Homes are promoting the land south of Coventry Road in conjunction with the landowners. The land is suitable, available and achievable to start delivering homes within a year of the local Plan adoption. The site is remarkably unconstrained however, for completeness, we outline its physical characteristics:

- **Capacity** – As demonstrated in the enclosed Vision Document and illustrative Masterplan, the site is more than capable of delivering 400 homes alongside required POS and infrastructure at a density of between 32 to 35 DPH on the net acreage. The total size of the site is approximately 44 acres.
- **Open space** – The site will deliver circa 16.8 acres of public open space, exceeding the policy requirements.
- **Services and facilities** – The provision of a new Doctors surgery alongside new retail provision will benefit the existing residents whilst providing a range of retail services over the existing Co-op, enhancing the overall sustainability of the village.
- **Access** – three points of access are able to be safely achieved without significant disruption to the network. One on Coventry Road with a ghost right hand turn lane, all within highways ownership, and two on Lawford Heath Lane. This dispersed access strategy allows for multiple points of entry/exit for emergency vehicles and to disperse any development traffic.
- **Topography** – The site falls gently towards Coventry Road, allowing a sensible boundary to the site and assisting with drainage runoff into the existing watercourses via gravity.
- **Landscape** – Scoring low/medium in the Councils own landscape study, the site sits low towards the settlement with any long distance views impaired by the cement works. The southern boundary of the allocation does not follow a hedgerow for a large part, however there was a historic hedgerow here. The Illustrative Masterplan reinstates this, bringing back a formal defensible boundary to the southern aspect. Davidsons have delivered sites across the same level of pipeline across the Midlands and Central region.
- **Gas pipeline** – a Cadent Gas pipeline traverses the site. We have rights to cross the pipe with roads and in addition this allows for a green vein to be retained through the centre of the site along the small easement corridor, creating legibility and character zones.
- **Flood risk from rivers and seas** – there are no flood zones from rivers and seas.
- **Surface Water** – there are small areas of surface water risk along the Coventry Road and near to existing watercourses. As demonstrated in the accompanying drainage strategy this is able to be removed through SUDS features that have been designed to store and attenuate up to and including the 1:100year event plus an additional 40% allowance for climate change. This is nothing that isn't encountered on every other site that Davidsons have delivered in its history.
- **Heritage** – There is only one listed asset in the vicinity, being a well contained grade II listed farmhouse. The barns associated with this are to be excluded from the scheme for now with appropriate buffering around them, as recommended by the Councils own heritage assessment.
- **Ecology** – there are no statutory designations on site, however a Local Wildlife site lies across from the western boundary. This creates the opportunity to take the land out of arable cultivation and introduce complementary habitat creation adjacent to the LWS. Habitats within the site may support a range of faunal species, however the appropriate surveys will be undertaken to identify any reasonable safeguarding as often experienced on development of sites like this.



To summarise, there are very limited physical constraints, none of which would affect this sites deliverability and viability. Any physical constraints listed above are capable of being mitigated through typical development engineering solutions which Davidsons are capable of constructing (and have done so many times in the course of delivering over 5,000 homes since 2007) and would be approved by the various statutory bodies through any planning application.

The Council's own evidence base conclusions are summarised below, clearly demonstrating that the site is one of, if not the least constrained site available:

- **SRBC's Rural Sustainability Study** (Dec 24) – Long Lawford ranks as the 5<sup>th</sup> highest of 40 settlements. Allocating this site allows the largest village in Rugby an opportunity for a doctors surgery and pharmacy which would improve the sustainability score significantly for existing residents benefit.
- **Highways congestion** – scores a 5 out of 6 (6 being least congested). Stantec have expended in their attached report, but the capacity in the road easily allows for an additional 400 homes.
- **Landscape sensitivity** – Scores a Medium/Low, the second best score with 'able to be mitigated through design. Golby & Luck expand on this in their appended report.
- **Heritage** – The Heritage Review comments that the Grade II listed farmhouse has limited visibility from the surroundings and its setting has been diluted from its 20<sup>th</sup> century amalgamation and character. It recommends a buffer to the farmstead and retention and reuse of the L-plan working buildings. This is currently proposed to be excluded for now, with a buffer.
- **Education** – Long Lawford Primary School currently has 132 spare spaces (20% spare capacity), meaning it is unlikely there will be capacity constraints. With the downward trend of primary school take up in villages such as this due to declining birth rates, the delivery of additional homes in Long Lawford will help to support the schools future existence with new pupils.

### Benefits of the allocation of Site 316 at Long Lawford

1. A beautiful new gateway to Long Lawford, creating a strong sense of place to be delivered by a local homebuilder with a track-record of delivering exemplar homes in well-designed places in Rugby Borough.
2. The provision of 400 high quality and well-designed homes, to be delivered in a timely manner to meet the Councils housing requirements in the largest and most accessible village in Rugby Borough by public transport.
3. The provision of up to 30% affordable housing to assist with shortening the waiting list, indistinguishable from the market housing.
4. A low-risk site with remarkably unconstrained physical characteristics, with an experienced development team assuring deliverability.
5. An increase in the village's sustainability through the provision of land for a Doctor's surgery and pharmacy, alongside an additional convenience retail offering.
6. Support for the existing village services, such as the Primary School through take up of the capacity.
7. Reinstatement of historic hedgerows once lost, coupled with creation of a circular walk that connects with the currently dead-end bridleway to the south.

We enclose a **Vision Document** which summarises a **series of independent technical reports** for each main discipline, before coming together in an **Illustrative Masterplan**. Each report is appended thereafter.

## Next Steps

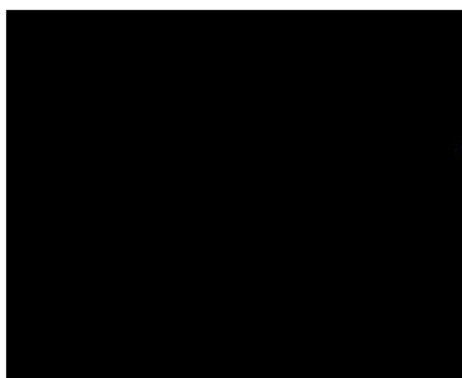
Davidsons strongly supports the identification of Land south of Long Lawford as one of the draft site allocations in the emerging Local Plan and have outlined in this representation a small number of areas where we believe the emerging policy for the site should be amended to increase the deliverability of the plan.

The identification of land south of Coventry Road as a housing allocation under Policy S6 will enable the largest village (by number of homes) in Rugby Borough to secure its future sustainability.

The site is:

- **Suitable** – As demonstrated through these representations, the accompanying Vision Document and plethora of supporting reports, the site has very limited constraints and all physical characteristics can be mitigated through commonly used development practices.
- **Available** - the land is owned in two parties, with both landownerships collaborating and making the land available for development with a delivery agreement with a local reputable homebuilder in place. Davidsons have now delivered over 5,000 homes since 2007 so are very experienced with delivery of homes on sites like this. A planning application would be forthcoming at the appropriate time in consultation with Rugby Borough Planning Department. This demonstrates the market demand for the site once it is allocated and assures its delivery.
- **Achievable** – Based on our experience of sites from 40 homes to 4,000, we believe that 400 homes is one of the most viable site sizes. The allocation at Long Lawford will be viable and able to deliver homes through two outlets to the market over the next 2-7 years.

Thank you for your time in reviewing these representations. Davidsons are keen to continue discussing the proposed allocation and any additional site-specific matters raised in this consultation with Officers and support the development of a sound Local Plan which is essential for the future success of Rugby Borough.



Enclosures:

1. Vision Document for Long Lawford
2. Access technical note, general arrangement plan & swept path analysis by Stantec
3. Landscape review by Golby & Luck
4. Heritage impact assessment by RPS
5. Ecological review by Aspect Ecology



DAVIDSONS

*Developers have an enormous responsibility to leave behind a positive legacy – after all, you only get one chance to get it right.*

**James Wilson**  
Managing Director

