

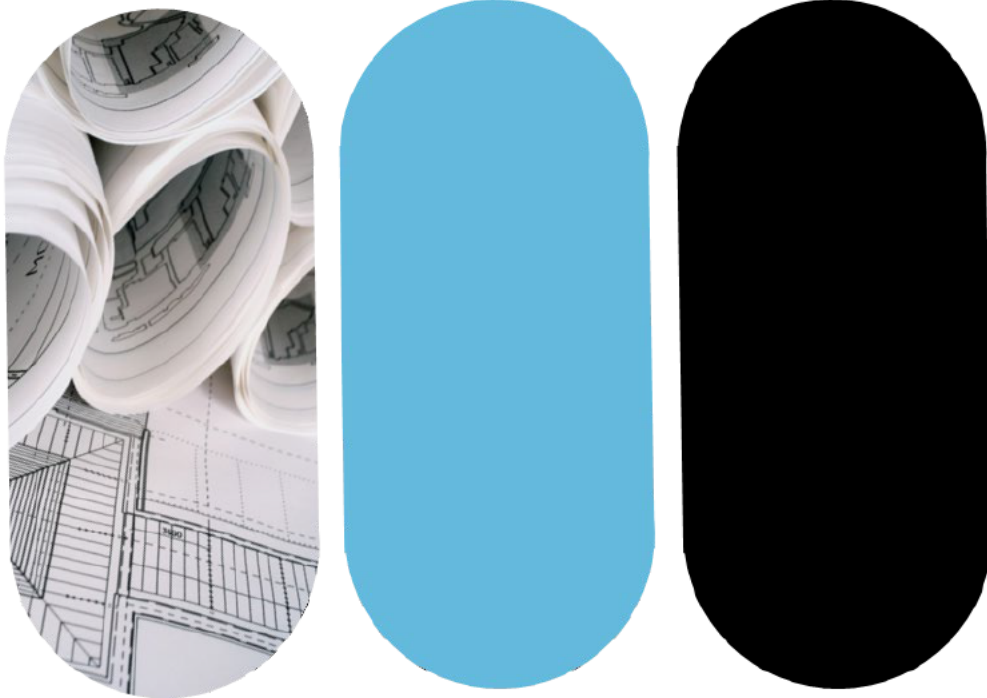
Bellway Homes Limited

Land at Fenley Field, Cawston, Rugby (Site ID 122)

Rugby Borough Local Plan

Regulation 18 (Preferred Option) Consultation

May 2025



1. Introduction

Question 1 – To what extent do you agree with the selection of these objectives?

No Response

Question 2 – What are the reasons for your answer to Question 1?

No Response

2. Strategy for Homes and Residential Allocations (Policies S2 and S6)

Question 3 - To what extent do you agree with the more dispersed overall spatial strategy for new homes?

Neither Agree nor Disagree

Question 4 - What are the reasons for your answer to question 3 and if you disagree with the proposed spatial strategy what alternative should we pursue?

Draft Policy S2 (Strategy for Homes)

Housing Need

Given the stage of preparation of the Rugby Local Plan, it does not qualify for the transitional arrangements set out in the National Planning Policy Framework (NPPF, December 2024) at Paragraph 234. As such, the Local Plan will be considered against the December 2024 version of the NPPF.

The basis of the housing requirement calculated in draft Policy S2 is the Local Housing Need derived from the Standard Method. Firstly, it should be noted that the updated affordability ratios published on 24th March 2025 has increased Rugby's Local Housing Need derived from the Standard Method from 618 dwellings per annum to 625 dwellings per annum, which equates to an increase from 12,978 dwellings over the Plan period (2024-2045) to 13,125 dwellings.

Furthermore, national planning practice guidance is clear that the Local Housing Need derived from the Standard Method may only be relied upon for a period of two years from the time the Local Plan is submitted for Examination¹. It would therefore be prudent for the Council to update the housing requirement calculated utilising the Local Housing Need derived from the Standard Method in the Publication version of the Local Plan and be mindful of any potential changes between Publication and Submission.

¹ Housing and Economic Development Needs Assessment Planning Practice Guidance, Paragraph: 008 Reference ID: 2a-008-20241212 (revision date 12/12/2024)

Notwithstanding this, the NPPF is clear that the Local Housing Need derived from the Standard Method calculates the minimum number of homes required (Paragraph 62), and that the housing requirement set out in a Local Plan may be higher to, for example, reflects growth ambitions linked to economic development or infrastructure investment (Paragraph 69). National planning practice guidance also makes reference to consideration of an increased housing requirement to help deliver the required number of affordable homes².

The Council should ensure it has fully considered whether the Local Plan should make provision for a housing requirement which is greater than the Local Housing Need derived from the Standard Method, in that context.

In addition, the NPPF is clear that any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for in a Local Plan (Paragraph 62). Failure to adequately address unmet needs arising from neighbouring areas would render the Local Plan not positively prepared and therefore unsound in line with NPPF Paragraph 36 a).

Bellway Homes note that the adopted Local Plan provides 2,800 dwellings to meet the unmet needs of Coventry until 2031. The Coventry Local Plan Review is well progressed and was subject to Regulation 19 consultation in January to March 2025. The emerging Coventry Local Plan Review reports a housing need of 29,100 dwellings with a supply of 31,493 dwellings over the Plan period 2021-2041. Thus, Coventry consider they will be able to wholly meet their housing need within the City Boundary. The Coventry Local Plan Review will be interrogated through Examination once it progresses to that stage, including the Council's draft housing allocations and assumed level of supply, and this should be monitored closely by the Council. Should an identified shortfall arise from Coventry, the Rugby Local Plan should make appropriate provision accordingly.

Approach to Site Selection

² Housing and Economic Development Needs Assessment Planning Practice Guidance, Paragraph: 024 Reference ID: 2a-024-20190220 (revision date 20/02/2019)

The Preferred Option approach of utilising small and medium size sites is supported by Bellway Homes. Small and medium size sites have reduced infrastructure and delivery constraints enabling delivery to commence at faster rate, whilst still contributing towards local infrastructure through the Community Infrastructure Levy (CIL).

The selection of a number of smaller to medium size sites over one larger site will help ensure that the Council's Five Year Housing Land Supply position is robust and defensible throughout the Plan period. Selection of a single site presents a large risk that a landowner or constraint outside of the Council's control could derail the Plan and significantly harm the stable supply of housing through the Plan period.

It is noted that circa 60% of the housing requirement is proposed to be met by the strategic housing allocations being carried forward from the adopted Local Plan i.e. South West Rugby, Houlton and Eden Park. Further reliance on large, strategic scale sites would place an overreliance on sites with complex planning arrangements.

Furthermore, as strategic sites are nil rated in the Council's adopted Community Infrastructure Levy (CIL) Charging Schedule, such sites will not contribute towards improved or enhanced infrastructure meaning that existing residents may not benefit.

The allocation of small and medium sized sites is directly supported by the NPPF at Paragraph 73 which recognises the importance of small and medium sized sites in helping meet the housing requirement, and the need to assist Small and Medium Enterprise (SME) housebuilders.

Small and medium sized sites within urban areas, such as of Land at Fenley Field, Cawston, Rugby (Site ID 122), contribute towards creating sustainable communities and are inherently sustainable due to the promotion of walking and cycling and the existing services and facilities in close proximity. Furthermore, new development within urban areas helps contribute towards the vitality and viability of existing services and facilities by providing increased footfall and local spending, as per Paragraph 90(f) of the NPPF.

Housing Supply

Bellway Homes note that the Local Plan proposed to include 1,050 dwellings in the anticipated supply arising from windfall development.

The NPPF is clear at Paragraph 75 that any windfall allowance should be supported by compelling evidence that windfall sites will provide a reliable source of supply, and be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. The Council should ensure that the assumed windfall allowance is compliant with the NPPF in that regard.

Furthermore, Bellway Homes consider that including a windfall allowance for each year of the Plan period is unsound given the likelihood of double counting with sites with planning permission also taken into account in the supply. The windfall allowance should therefore be reduced to 900 dwellings, i.e. 18 years and not 21 years worth of windfall supply, assuming there is compelling evidence that a windfall allowance of 50 dwellings per annum is provided by the Council in line with NPPF Paragraph 75.

Buffer

Draft Policy S2 indicates that a buffer of circa 9% is included within the supply to allow for flexibility, which is supported in principle. However, Bellway Homes consider that a minimum buffer of 10% would be appropriate, and that this should be inherently embedded in the calculation rather than demonstrated through supply, i.e. the housing requirement should include the 10% buffer.

Draft Policy S6 (Residential Allocations)

Bellway Homes wholly support the identification of Land at Fenley Field, Cawston, Rugby (Site ID 122) as a proposed allocation in draft Policy S6.

The Site is identified within the Housing and Economic Land Availability Assessment (HELAA; March 2025) as being available, achievable and suitable. Based on this positive assessment, all five growth scenarios assessed within the Sustainability Appraisal included the Site as an allocation to form a component of the housing land supply for the Local Plan to help meet the housing needs of Rugby Borough.

The Site is within close proximity to Bilton's Local Centre (approx. 2 minute walk), as shown on the Policies Map. A range of services and facilities such as Bilton Infant School, Bilton Post Office, Bilton Pharmacy, and multiple food convenience stores,

public houses, cafes, restaurants, are all available within walking distance of the site, making it a prime candidate for sustainable development. Furthermore, Bilton School and Rugby High School are also both within walking and cycling distance of the site.

Substantial open and green space will be available within the post-development site, in accordance with Appendix 2 of the Local Plan (Open Space Standards).

Notwithstanding the provision to be provided on-site, the immediately adjacent Bilton Poor Lands Allotments and Calvestone Park provide substantial green and open space, with Rugby Welsh RFC and the sport pitches within the previously mentioned schools providing local sports provision.

Development of Land at Fenley Field, Cawston, Rugby (Site ID 122) is a logical and reasonable approach due its position between the existing urban form of Rugby and the South West of Rugby allocation (adopted in the current Local Plan; Policy DS8). As per the adopted South West Rugby Masterplan SPD (adopted December 2024), land to the immediate south of Land at Fenley Field, Cawston, Rugby (Site ID 122) will include the provision of new healthcare, retail, and education facilities and significant open space and sports provision. All of this will benefit the residents and complement development of Land at Fenley Field, Cawston, Rugby (Site ID 122), and ensure local residents have sufficient access to sports facilities following the relocation of Old Laurentians Rugby Club.

Question 5 - Is there a site that is proposed to be allocated for housing in policy S6 that you do not support? If so, which site and why?

No Response

Question 6 - The development sites annex lists development requirements for the allocated sites. Are there additional or different requirements we should be seeking? Please specify which site you are referring to.

Bellway Homes recognise the development requirement for Land at Fenley Field, Cawston, Rugby (Site ID 122) to secure an alternative location for Old Laurentians RFC.

Old Laurentians RFC have identified an alternative location at Land East of Popehill Lane, as submitted to the HELAA (Site ID 123) and are in the process of making appropriate arrangements for relocation.

Bellway Homes consider that clarity should be provided in the Development Requirements Annex as to how far advanced Old Laurentians RFC are in securing an alternative location before development of Land at Fenley Field, Cawston, Rugby (Site ID 122) will be supported in principle. Indeed, if alternative provision is secured in advance of the Submission of the Local Plan, this development requirement should be removed.

3. Strategy for Employment Land and Employment Allocations (Policies S3 and S7)

Question 7 – To what extent do you agree with the strategy for employment land?

No Response

Question 8 - What are the reasons for your answer to question 7? If you disagree, what alternative location(s) would be better and why?

No Response

4. Gypsy and Traveller Sites (Policy S4)

Question 9 – To what extent do you agree with Policy S4?

No Response

Question 10 – What are the reasons for your answer to question 9?

No Response

5. Climate

Question 11 – To what extent do you agree with the approach to reducing emissions and adapting to the effects of climate change?

Disagree

Question 12 - What are the reasons for your answer to question 11?

Policy CL1 (Net Zero Buildings)

The target of Net Zero is noted and it seems logical to implement policies which encourage the construction of Net Zero Carbon buildings. Notwithstanding this, the definition of “ultra-low energy” and “fossil fuel free” is unclear. Fossil fuel free developments from construction through operation may lead to unviable and unfeasible developments.

Having said that, Bellway Homes object to criteria A iii. and iv. of draft Policy CL1 as it is unlikely to be practical, viable or desirable to incorporate on-site renewable energy within new development.

The delivery of Net Zero buildings and housing should be promoted and supported, however in the context of the national housing crisis and shortfall of homes in Rugby Borough, a requirement for all new buildings to be designed and built to be fossil fuel free is likely to come at the expense of housing delivery and viability on some sites. In order to be sound, any Net Zero policy will need to ensure that it has been adequately tested through viability.

With regards to draft Policy CL1 criterion B ii, an Energy Use Intensity (EUI) target of 35kWh/m²/yr sets a very high fabric standard requirement. Regardless, the EUI metric should not be used within the Local Plan as the Future Homes Standard will not utilise this metric moving forward. In any case, NPPF Paragraph 164 b) is clear that Local Plans should be in line with the requirements of Building Regulations, which themselves are expected to be changed by the forthcoming Future Homes Standard. Thus, criterion B of draft Policy CL1 should be deleted.

Policy CL4 (Climate Adaptation)

Bellway Homes consider that draft Policy CL4 should be deleted.

Criterion A i. been superseded as a result of Part O of the Building Regulations which now requires an assessment of overheating risk, and if necessary, the introduction of mitigation measures.

Criteria A ii. and iii. broadly repeat other draft Policies in the Local Plan including draft Policy EN6, and are therefore unnecessary.

6. Economy

Question 13 - To what extent do you agree with the document's economic policies?

No Response

Question 14 - What are the reasons for your answer to question 13?

No Response

7. Centres

Question 15 - To what extent do you agree with the policies for retail centres?

No Response

Question 16 - What are the reasons for your answer to question 15?

No Response

8. Environment

Question 17 - To what extent do you agree with the document's environmental policies?

Disagree

Question 18 - What are the reasons for your answer to question 17?

Policy EN5 (Canopy Cover)

Bellway Homes consider draft Policy EN5 to be onerous and impractical, and recommend it is deleted.

Should the Council seek to retain draft Policy EN5, the Council's 'approved calculator' should be published as part of the evidence base for the Regulation 19 consultation to ensure it can be scrutinised against best practices.

The Council acknowledge in Reasoned Justification Paragraph 5.16 that it may not be practical or desirable to achieve 20% canopy cover and that negotiations may allow a lower level of canopy cover. The ability to negotiate should be included within the Policy wording of draft Policy EN5 if the Policy is to be retained.

9. Housing

Question 19 - To what extent do you agree with the document's housing policies?

Disagree

Question 20 – What are the reasons for your answer to question 19?

Draft Policy H2 (Housing Mix)

Criteria A of draft Policy H2 requires clarity to define the boundary of the Rugby urban area to which the 20% affordable housing requirement applies.

In addition, Bellway Homes consider it is illogical to prescribe an affordable housing tenure mix within the Plan as the need for varying tenures may change throughout the life of the Plan. Draft Policy H2 criterion B should be amended to reflect the approach taken in Policy H1 and ensure that affordable housing tenures reflect the latest local need from the evidence. Furthermore, site-by-site flexibility should be incorporated to ensure that phases within larger schemes can provide an alternative mix, and be able to address specific local needs where they differ.

Draft Policy H7 (Housing Standards)

Criteria D and E of draft Policy H7 seek to prescribe minimum garden / private outdoor space requirements. This is onerous and could contribute to places that are not well-designed as a result. There could also be an impact on development viability, which could reduce the level of affordable housing which is deliverable in the Borough in turn.

10. Wellbeing

Question 21 - To what extent do you agree with the document's wellbeing policies?

Disagree

Question 22 - What are the reasons for your answer to question 21?

Draft Policy W1 (Protection of Community Facilities)

Bellway Homes support the principles of draft Policy W1, however the requirements set out in criterion A i. are incompatible with the development requirements for proposed residential allocation of Land at Fenley Field, Cawston, Rugby (Site ID 122) which Bellway Homes are promoting.

Criterion A i. of draft Policy W1 seeks to require alternative provision be made, that is equally as accessible to the local community, prior to the commencement of the redevelopment. However, the development requirements for residential allocation Land at Fenley Field, Cawston, Rugby (Site ID 122) require the identification and securing of an alternative location for Old Laurentians RFC. Bellway Homes consider the latter is more appropriate in this case, and if criterion A i. of draft Policy W1 is to remain wording should be included to exclude residential allocations, deferring to the development requirements set out for each instead.

Draft Policy W2 (Open Space and Sports Provision)

Criterion C of draft Policy W2 should be broadened to support off-site contributions towards open space and sports provision rather than on-site provision where it would be impractical or not beneficial to deliver a typology on-site. For example, development of a scheme for 80 dwellings would not generate a requirement for a full pitch for any sports provision and the requirement for allotments would be de minimis at circa 0.12ha. Clearly in such cases, contributions towards off-site provision would be preferable.

11. Design

Question 23 - To what extent do you agree with the document's design policies?

No Response

Question 24 - What are the reasons for your answer to question 23?

No Response

12. Infrastructure

Question 25 - To what extent do you agree with the document's infrastructure policies?

Disagree

Question 26 – What are the reasons for your answer to question 25?

Draft Policy I4 (Infrastructure and Planning Obligations)

With regard to criterion C of draft Policy I4, whilst Bellway Homes have wider concerns on the logistics and policing of viability reviews after planning permission has been granted, clarity should be provided on the triggers for viability reviews during construction and once development is complete.

Furthermore, flexibility should be embedded into the requirements of criterion D of draft Policy I4, recognising the limitations of non-strategic residential development to demonstrate potential for ongoing employment and training post-construction, as recognised in Reasoned Justification Paragraph 9.13.

Draft Policy I6 (Secondary Education)

Bellway Homes recognise the need to provide and contribute towards infrastructure necessary to facilitate development, in a proportionate manner. Draft Policy I6 should be robustly evidenced to ensure the level of contributions sought towards secondary education infrastructure are appropriate, including through the supporting Infrastructure Delivery Plan, and suitably tested to ensure that development viability would not be unduly impacted.

13. Any Other Feedback

Question 27 – If there are any other comments you wish to make regarding the consultation document which you have not already given in your preceding answers, please enter them here.

N/A

14. About You

Question 28 – What is your name?

[REDACTED]

Question 29 – What organisation are you representing?

[REDACTED]

Question 30 – Are you resident of Rugby Borough?

N/A

Question 31 – Email address

[REDACTED]

Question 32 – Contact address

[REDACTED]

Question 33 – Postcode

[REDACTED]