

Development Strategy
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13th March 2026

Dear Sir/Madam,

CHURCHILL LIVING AND MCCARTHY STONE RESPONSE TO THE RUGBY LOCAL PLAN REG 19 DRAFT

McCarthy Stone (MS) and Churchill Living (CL) are independent housebuilders specialising in specialist housing for older people. Together, they are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing. Both operators are therefore well placed to provide comment on the policy barriers that may have the potential to restrict supply within the sector.

Please find below our comments on the draft local plan insofar as they impact the delivery of specialist accommodation for older persons. These comments are intended to assist the council in formulating approaches which are both workable in practice and avoid stymying the delivery of a housing typology which the PPG describes as 'critical' in terms of addressing housing need.

H2 Affordable housing

We support the exemption for older persons housing. This is the correct approach following the plan wide viability review which found that this type of proposal was unable to support affordable housing provision and remain viable. This approach is consistent with national policy and justified and will therefore be effective at delivering older persons housing.

H7 Housing Standards

As mentioned previously, the PPG on viability states that the role for viability assessment is primarily at the plan making stage to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan (Paragraph: 002 Reference ID: 10-002-20190509). M4(2) and M4(3) housing has a cost implication and may serve to reduce the number of dwellings and further reduce viability.

The PPG further states that Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied. (Paragraph: 008 Reference ID: 56-008-20160519)

The draft plan requires 3.5% of all housing of 10 or more units to be built to M4(3) standard. Given that the local plan wide viability study does not demonstrate this requirement is viable, the draft policy should state.

C. On developments of 10 or more homes, 3.5 per cent of dwellings shall meet the requirements for Category 3 – wheelchair user dwellings set out in Part M4(3) of Schedule 1 to the Building Regulation 2010 (as amended) - **where viable and practicable.**

H6 Specialist Housing

We support policy H6 Specialised housing given its support for schemes that provide for housing that maximises the independence and choice of older people and those members of the community with specific housing needs, subject to its compliance with other policies of this plan.

We would comment that the two sites proposed for allocation for older persons housing are for bungalow schemes on the edge of settlements. It is considered a missed opportunity not to allocate further sites for older persons housing, suitable for apartments and closer to local amenities thereby allowing older people to downsize and be less dependent upon car usage.

CL1 Net zero buildings

Whilst the Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and climate standards from adoption of the plan that may go beyond government targets.

It is our view that any requirement should be 'stepped' in line with Government targets and the proposed changes to the building regulations to ensure that any requirement is achievable and viable. The entire industry needs to adjust to zero carbon requirements in line with the advancement of technology, scaling up and economies of scale. Where policies seek to go beyond this curve, there is a danger that these requirements result in a significant reduction in housing delivery within those areas due to financial viability constraints.

This approach is confirmed within the Ministerial Statement (statement no : Statement UIN HCWS123 available from [Written statements - Written questions, answers and statements - UK Parliament](#)) released on 13th December 2023. The ministerial statement confirms that with respect to the net zero goal....

'The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale' and 'To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable

development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, including this one’.

Deleting the policy and aligning the Council’s requirement for carbon neutral development with those of Government would therefore be pragmatic, more achievable and consistent with national policy. These requirements have not been shown to be viable and may put at risk delivery of housing targets.

Recommendation

- *The policy is deleted as Net Zero Carbon development is to be dealt with via the Building Regulations; or*
- *Additional wording to section A*

A. New buildings comprising one or more dwellings and new non-residential buildings of 100m2 gross internal area or more must be designed and built to be net zero carbon in operation, in line with government targets and where viable.

I2 Parking

Paragraph A of the policy says:

A. Adequate parking shall be provided for bicycles and vehicles (including motorcycles) in accordance with the parking standards in Appendix 1. This will include the provision of vehicle parking to meet the needs of people with disabilities or impaired mobility.

Appendix 1 provides the following table for Active Elderly: sheltered housing

Dwellings for Elderly Persons					
Active elderly: sheltered housing/age restricted housing/retirement housing	1 space/dwelling	0.5 spaces/dwelling	0.05/bedroom secure and under cover	0.05/bedroom	
Sheltered housing with resident warden	0.5 spaces/dwelling	0.25 spaces/dwelling	0.05/bedroom secure and under cover	0.05/bedroom	

We are pleased the rates have been reduced since the Reg 18 consultation but continue to consider such requirements are unnecessary.

Older person’s housing and in particular Extra Care accommodation, is used by older people who tend to be frail and are likely to have mobility difficulties. Were an older person likely to cycle on regular basis it would be unlikely they would require extra care accommodation.

A survey of 242 McCarthy and Stone Retirement Living units showed only 7 bicycles owned by residents in these apartments. This is an ownership rate of 0.0289 cycles per apartment or 1 cycle per 35 apartments. Churchill Living’s own data across 5,202 existing units (across 127 developments) showed a demand for 0.01755 per apartment. For a 45-unit scheme this would equate to less than 1 space (including allowance for Lodge Managers who cycle to work).

Whilst we can understand the rationale behind encouraging cycling in the general population, we consider that a requirement for cycle spaces in specialist older persons' housing to be inappropriate and unnecessary. Both companies provide an internal mobility scooter store for use by residents which is a far more relevant requirement and in the handful of instances that a resident has used a bicycle it can be stored in this area.

We consider the cycle parking requirements for older persons' housing would constitute overprovision in our experience and cycle parking should be limited to staff and visitors accordingly.

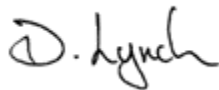
Recommendation

Delete the requirement for the provision of residents' cycle parking for dwellings for elderly persons so that each case is considered on its own merits. Similarly, parking requirements must be considered based upon the data of the main providers and each application considered on its own merits.

Conclusions

Thank you for the opportunity for comment.

Yours faithfully,



Damien Lynch MRICS

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