



RUGBY BOROUGH COUNCIL

*Local Plan: Development Strategy Consultation
Summer 2014*



CLEAN, GREEN, SAFE

Purpose and Consultation

This document has been prepared to provide you with information about the new Local Plan that the council is preparing and to encourage you to be involved in its preparation. Your comments on the proposals highlighted in this paper will shape the local plan as it moves forward to the next consultation stage.

Responses must be received by the Development Strategy Team by **11th July 2014**:

Rugby Borough Council,
Town Hall,
Evreux Way,
Rugby, CV21 2RR.

Copies will be made available within the council office and the Borough's libraries and online at www.rugby.gov.uk/localplan.

Next Stages

The responses received following this consultation will help inform additional evidence production which will underpin and help shape future Local Plan consultations as detailed in the below table. Each consultation undertaken will be for a minimum of a six week period.

STAGE	CONSULTATION TIMESCALES
Discussion Consultation Paper	1 st July – 27 th August 2013
Development Strategy Consultation	30th May to 11th July 
Preferred Options	January – February 2015
Publication	June – July 2015
Submission	September 2015
Examination	December 2015
Adoption	March 2016

The responses to this consultation, alongside those received to the Discussion Paper last year will inform the next stage of the consultation, which will be the Preferred Options Local Plan, in January 2015.

Local Plan Development Strategy

Introduction and Background

Rugby Borough Council is undertaking public consultation on the emerging Local Plan in response to recent technical evidence that outlines new housing need figures for the Borough. This document takes stock of the current position of the local development plan and makes initial proposals on how the council will move forward in the production of the emerging Local Plan. This consultation paper provides a review of the performance of the Core Strategy (CS) against its housing target in the context of the publication of the National Planning Policy Framework (NPPF) and introduces the joint Coventry and Warwickshire Strategic Housing Market Assessment (SHMA). In pulling all this information together the paper considers the implications on the current position of housing targets and land supply.

It should be noted that this paper focuses on housing delivery and does not consider either employment, retail growth or infrastructure requirements or the other policy areas that will be contained within the new Local Plan. The paper also advertises the Strategic Land Availability Assessment (SLAA) 'call for sites' which is being run alongside this consultation.

Sustainability Appraisal

Plan making must be accompanied by a Sustainability Appraisal, which considers the environmental, economic and social impacts of that plan. It is a requirement of the Strategic Environmental Assessment Regulations that reasonable options (of a plan) are appraised in the same level of detail, and it is necessary to demonstrate that the SA process has fed into the selection of which options are preferred.

Unlike the Local Plan Discussion Paper consultation in July 2013, this consultation is not accompanied by a Sustainability Appraisal (SA) as it does not set out reasonable options for the Plan and as such does not need appraisal.

The Sustainability Appraisal and Scoping Reports for the Discussion Paper consultation, produced independently by LUC, are available to view at www.rugby.gov.uk/sustainabilityappraisal

The Preferred Options consultation, which will follow this consultation, will be accompanied by a Sustainability Appraisal as it will contain reasonable alternatives to the approaches that the council will propose.

Current local planning policy

Rugby Borough Core Strategy

The Core Strategy was adopted by the council in June 2011 and plans for the growth of 10,800 homes within the Borough in the plan period 2006 – 2026. The Core Strategy directs 9,800 of the total 10,800 houses to Rugby town, which was a provision contained within the former emerging Regional Strategy, which has now been revoked.

The Core Strategy was at an advanced stage when the Government published its intended revocation of the Regional Strategy. Notwithstanding this, the direction of the majority of Core Strategy growth was maintained as deliverable sites were identified at Rugby town as the most sustainable location in the Borough.

To meet the above housing requirement the Core Strategy allocates two significant urban extensions of 1,300 (The Gateway) and between 5,000 - 6,200 (Rugby Radio Station) homes within this plan period. The Core Strategy is also accompanied by a housing trajectory for the full extent of the plan period, which detailed all sites to deliver the 10,800 requirement.

Furthermore the Core Strategy contains a strategy to direct further growth in the Borough, in the form of policy CS1: Development Strategy, as detailed below.

Core Strategy Policy CS1: Development Strategy	
<i>The location and scale of development must comply with the settlement hierarchy. It must be demonstrated that the most sustainable locations are considered ahead of those further down the hierarchy.</i>	
RUGBY TOWN CENTRE	<ul style="list-style-type: none"> • Primary focus for services and facilities.
RUGBY URBAN AREA	<ul style="list-style-type: none"> • Primary focus for meeting strategic growth targets.
MAIN RURAL SETTLEMENTS	<ul style="list-style-type: none"> • Development permitted within existing village boundaries. • Local housing needs is prioritised over market housing
LOCAL NEEDS SETTLEMENTS	<ul style="list-style-type: none"> • Small scale development to meet local housing needs permitted within existing village boundaries. • A threshold of 0.2 Ha applies. • Development will not be permitted if the site could reasonably form part of a larger developable area.
COUNTRYSIDE	<ul style="list-style-type: none"> • New development will be resisted; only where national policy on countryside locations allows will development be permitted.
GREENBELT	<ul style="list-style-type: none"> • New development will be resisted; only where national policy on Green Belt allows will development be permitted.

As the top two tiers on the settlement hierarchy are occupied by Rugby town centre and the Rugby urban area, Rugby town supports the majority of growth, as the most sustainable location in the Borough. Consistent with national policy, Countryside is the penultimate from bottom and Greenbelt is at the bottom of the hierarchy, as the least sustainable locations for new development.

The remaining tiers are occupied by Main Rural Settlements and Local Needs Settlements. The settlements that have defined village boundaries are categorised into either of these tiers depending on the level of services they have (such as shops, doctors surgery and public transport). Villages with the greater range of facilities were defined as Main Rural Settlements. This was informed by a Settlement Hierarchy Paper, which surveyed all the villages.

Rugby Borough Local Plan Discussion Paper

Rugby Borough Council consulted on a Local Plan Discussion Paper in July 2013. This paper formed the first consultation on a Development Plan Document (DPD) to sit alongside the adopted Core Strategy. Gaps in policy at the local level were identified as a consequence of the publication of the National Planning Policy Framework and proposed the likely policy direction it would take for each gap identified. The document also contained the proposed approach to replacing the remaining saved 2006 local plan policies.

Despite having a development management focus, the paper asked consultees whether the Local Plan should form a separate DPD alongside the Core Strategy, or whether the two documents should be merged into one development plan document. The council is grateful for the responses received on the Discussion Paper.

In considering all responses received it was found that members of the public in particular would find a single policy document for the Borough more legible than a suite of documents with cancelled and replacement policies. This view was also supported by comments stating in the interests of clarity and transparency, and to ensure the local policy position is comprehensible and accessible there should be only one policy document.

On the basis of responses received and advice contained within the NPPF, the council determined that the Core Strategy and Local Plan should become one composite document in directing development within the Borough.

What Has Changed?

National Planning Policy Framework March 2012 (NPPF)

The publication of the NPPF in March, 2012, post the adoption of the Core Strategy has consequences for plan making. It seeks that local planning authorities should ensure that the local plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

Strategic Housing Market Assessments (SHMA)

Prior to its revocation, the Regional Strategy set the housing requirement for each local planning authority to plan for. Since removal of this tier of governance and the policy guidance contained within it (including housing targets), the NPPF advocates the preparation of Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries identify the housing need within their authority area. The NPPF is specific that local planning authorities must have a clear understanding of housing need in their area. Once produced, the SHMA should form an integral evidence document to inform plan making.

The Joint Coventry and Warwickshire Strategic Housing Market Assessment, November, 2013

At Coventry City Council's Core Strategy Examination in Public the Inspector advised that housing needs evidence should be revisited and should be produced at the Housing Market Area level, which would require working with adjacent authorities. In his letter to the authority, in which he advised that they withdraw their Core Strategy from the Examination, he prescribed the authorities that this should include, one of which was Rugby.

Therefore a joint Strategic Housing Market Assessment (SHMA) has been produced for the whole of the Coventry and Warwickshire area. The main outputs of the study include the housing needs for the future, the likely mix of housing that will be required and also the housing needs of specific groups.

The SHMA confirms that Warwickshire and Coventry is one Housing Market Area, which is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between where people live and work. The NPPF requires that local planning authorities meet the full objectively assessed needs for housing within their Housing Market Area.

For each authoritative area, the SHMA identifies a minimum housing need and an assessed housing need. The minimum need is the housing need required to meet the rise in households by 2031, informed by the 2011 Interim Household Projections and updated data on population trends, including migration. For Rugby Borough this was identified as 575 per annum, which is 11,500 in total, up to 2031.

The SHMA also identified an 'assessed need'. This took a midpoint figure in between the 2008 and the 2011 Interim Household Projections to identify a robust likely household formation rate. In addition to the housing need originating from population projections, it also considered the impacts of economy, including job creation and the affordability of housing. For Rugby Borough, this was identified as 660 homes per annum, which is 13,200 in total. In producing the SHMA, the assessed need is considered to be the more robust figure.

Clearly if either figure were to be planned for this would see an increase from the annual requirement of 540 as contained within the Core Strategy. However, in identifying housing need, the SHMA does not impose housing numbers to be delivered within the Borough from 2011 – 2031. The SHMA is not policy, but evidence which informs the content of policy. The SHMA is clear that it does not take account of issues relating to land supply, infrastructure or other constraints such as floods zones and states that further work must be done by local planning authorities to identify what should be the correct housing target. The following is therefore recommended:

- » The identification of available and suitable land for development through the revision of a 'policy of' Strategic Housing Land Availability Assessment.
- » The identification of strategic development constraints which will limit the extent of housing development land. This will include constraints such as Flood Zones.
- » The ability of infrastructure to support development. This will inform the production of the Community Infrastructure Levy Charging Schedule which will be necessary to ensure that the appropriate infrastructure is delivered alongside the housing requirement.

By undertaking the above work, the ability of a local authority to accommodate its housing need can be identified. The SHMA advocates continuing collaborative working at the sub regional level in ensuring that the total housing requirement for the Housing Market Area can be met.

5 year land supply

In addition to the increase in the housing need for the Borough, the council cannot currently demonstrate a five year housing land supply. The NPPF has changed the way in which local planning authorities monitor their housing land supply. It places a much greater emphasis than previous national planning policy on local planning authorities delivering housing and drives the number of dwellings to meet the shortfall in housing supply.

Five year housing land supply calculations must now also include a further 5% of the housing requirement moved forward from later in the plan period. The NPPF requires this to allow for 'choice and competition' of sites for developers to ensure that housing delivery is achieved at the desired rate. As the Core Strategy predates this requirement, it does not form part of the housing trajectory. Furthermore if local planning authorities persistently do not meet their housing targets then 20% rather than 5% must be brought forward into the five year land supply calculations. The NPPF is clear that such mechanisms are to significantly boost the supply of housing.

Not being able to demonstrate a five year housing land supply is exacerbated by the increase in the housing need as identified in the SHMA. Although this is evidence and not enshrined in policy it does offer a likely direction that the policy will take.

The NPPF is clear that if a council cannot demonstrate a five year housing land supply, then in deciding housing applications, local planning authorities must defer to the NPPF. When this is the case, the NPPF considers the local policies for directing housing to be out of date and stipulates that housing applications should be considered in the context of a presumption in favour of sustainable development and the local authority can no longer apply its own local policies in directing development.

What should we do?

When pulling together all of the above factors it is clear that there is a shortfall of housing land not only against the need emerging from the SHMA (although in itself not an actual housing requirement target) but also against the established Core Strategy target, which requires policy intervention and the identification of additional housing land to resolve.

Plan Period

It can be immediately surmised that there is a clear need for further allocation of land to meet the requirement as identified in the SHMA. As the SHMA evidences to 2031, at the least it is anticipated that the Core Strategy plan period is extended to meet the needs beyond 2026.

The Local Development Scheme adopted by Cabinet in January 2014, timetables the adoption of the Local Plan in March 2016. The NPPF requires local plans to run for at least a 15 year period from their date of adoption. Clearly at present there are only 12 years remaining on the Core Strategy plan period. In combining the Local Plan and the Core Strategy into a new local plan, in order to conform with the NPPF, this plan period will need to be extended to at least 2031. This is consistent with the evidence period of the SHMA, so therefore considered appropriate.

Proposal 1: Plan Period

The Core Strategy plans for the period 2006 – 2026. However, the emergence of the sub regional SHMA evidences the period 2011 – 2031. The council is therefore proposing that the Local Plan should be planned for the same time period. This will allow the council to plan for housing needs for the full extent of the SHMA (in consideration of constraints to delivery).

Core Strategy Policy CS1: Development Strategy

The Core Strategy was adopted in a very different climate than is currently in place. It undertook several periods of consultation, was supported by extensive evidence and underwent detailed scrutiny at examination by an Independent Inspector. The Inspector ensured that the Core Strategy was sound against the policy framework at the time. The plan adopted therefore was assessed to be efficient and fit for purpose at the time of adoption.

Although in principle, it is considered that the sequential approach within CS1 is in conformity with the NPPF and functioning well, the delivery strategy needs some amendment or supplementing with additional sites to bridge the housing requirement gap. There are small changes to CS1, largely in relation to conversions, as detailed in the Discussion Paper, which will be amended accordingly within the Preferred Options Local Plan consultation.

As part of revisiting CS1, the council will update the Settlement Hierarchy Paper, to determine whether the designation of villages within CS1 should remain as they currently are or whether changes in village services mean that some movement is required.

Furthermore the Discussion Paper also consulted on the inclusion of a policy which is clear on the presumption in favour of sustainable development. This policy approach will be consistent with and sit alongside CS1.

Proposal 2: Core Strategy CS1: Development Strategy

The council is of the view that the principle of CS1 is compliant and can continue to function in directing growth in the borough.

It is proposed that the settlement hierarchy is retained as the policy approach to directing growth in the Borough. As part of the Discussion Paper consultation, the council made clear that CS1 was in principle in conformity with the NPPF.

Plan Making: Meeting housing need

Until the publication of a SHMA, the Local Plan Discussion Paper determined that the delivery strategy within the Core Strategy was sound and therefore did not propose any other site allocations. However, it is apparent that this position can no longer be considered to be made on a sound basis.

Without undertaking the three stages of work recommended in the SHMA it is not yet clear how many dwellings the council will be able to plan for. But, it is certain that with an additional requirement from the SHMA added to the Core Strategy requirement the authority will continue to not be able to demonstrate a five year land supply. It is the council's intention that the housing needs of the borough as identified within the SHMA, will be met through the allocation of appropriate and deliverable sites as far as possible.

Aside from the fact that there has been some delay in delivering the Core Strategy growth, it is not known whether the urban area would have the additional capacity to accommodate further housing need as identified in the SHMA. Therefore, the council will embark on the three stages of identification of land, strategic constraints and the ability of infrastructure to deliver future housing as advocated in the SHMA.

Proposal 3: Plan Making Evidence

Whilst it is the view of the council that the principle of CS1 is compliant and can continue to function in directing growth in the borough, it is clear that the current land allocation cannot fulfil future housing need, in particular when extending the plan period to 2031.

To support the delivery of housing in the Borough, the council is proposing to consider other sustainable locations within the Borough as per the settlement hierarchy contained within CS1 for future housing sites. This will be done by:

- The identification of available and suitable land for development through the revision of a 'policy off' Strategic Housing Land Availability Assessment.
- The identification of strategic development constraints which will limit the extent of housing development land. This will include constraints such as Green Belt and Flood Zones.
- The ability of infrastructure to support development. This will inform the production of the Community Infrastructure Levy Charging Schedule which will be necessary to ensure that the appropriate infrastructure is delivered alongside the housing

Next Steps:

In addition to making adequate provision for housing needs, the council will be required to consider further land allocation for employment and retail beyond what has been allocated as part of the Core Strategy. Currently the Core Strategy allocates 108Ha of employment land including the Rugby Gateway and Rugby Radio Station allocations. However, sub regional employment land evidence currently in production may identify further requirements. If this is the case, the next stage of consultation of the local plan will propose land allocations to meet any identified need.

In addition to identifying any additional strategic growth that the local authority should plan for, the council will also be embarking on the update of other evidence documentation. A Strategic Flood Risk Assessment has recently been completed. Further work will include the necessary suite of environmental evidence, about which this authority will be contacting of the Environment Agency, English Heritage and Natural England directly to ensure that this will be a robust evidence base in which to inform future allocation of housing land.

The council has also embarked on a new Gypsy and Traveller Accommodation Assessment (GTAA) to inform the Gypsy and Traveller Site Allocation DPD.

Strategic Land Availability Assessment 'Call for Sites'

Running alongside this consultation document, the council is undertaking a further call for sites to inform a new Strategic Land Availability Assessment. This 'call for sites' will inform the potential capacity to deliver the housing need, which can be assessed through the SHLAA.

If you wish to submit a site for submission, please either visit the council website at www.rugby.gov.uk where the relevant information, including the submission form is available, or request a form by contacting the Development Strategy Team on 01788 533762.

All those who have previously asked to be contacted have been, including those who made submissions to the September 2013 SLAA.

If this information is difficult to understand we may be able to provide it in another format, for example in large print, or in another language. Please contact the Communications Team on 01788 533864 or email communications@rugby.gov.uk



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