

# **RUGBY BOROUGH LOCAL PLAN**

## **PREFERRED OPTION CONSULTATION**

### **HOUSING TARGET AND DISTRIBUTION BACKGROUND PAPER**

**14<sup>th</sup> December 2015**



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## **1. INTRODUCTION**

1.1. This Background Paper has been produced to support the Rugby Borough Local Plan 2011-2031 Preferred Options consultation 2015.

1.2. The purpose of the paper is to outline the evidence and options considered in developing the housing target and distribution strategy proposed within the Preferred Option.

1.3. The paper takes the following structure:

- The process that has led to the identification of a housing target is outlined;
- Spatial Options considered in the development of a Distribution Strategy are introduced;
- Evidence informing proposed land allocations is outlined before each proposal is discussed in detail. This section is structured with reference to the settlement hierarchy; the urban area is discussed first, before the rural area is broken into hierarchy levels;
- The implications of proposed site allocations for the phasing of housing delivery during the plan period are then discussed before conclusions are presented.

1.4. The Preferred Option consultation is an important stage in the plan making process. However, further work and public consultation is required before the Local Plan is submitted for examination. As a result, the evidence and topics referred to within this paper will be kept under review as the Council progresses the emerging Plan. The content of this document and the Preferred Option itself could therefore change before the Plan is submitted.

1.5. This Paper should be read alongside the evidence that it refers to. Namely:

- The Sustainability Appraisal of Preferred Option by LUC;
- The Strategic Housing Land Availability Assessment;
- The Housing Delivery Study undertaken by GL Hearn;
- High level transport work undertaken by Warwickshire County Council;
- The Rural Sustainability Study.

1.6. Each of these documents are available on the evidence base pages of the Council's website.

## **2. HOUSING TARGET FOR THE LOCAL PLAN**

2.1. One of the key decisions the Borough Council has to make when writing a Local Plan is how many homes will be needed within the plan period. The purpose of this section is to outline the evidence that has informed the housing target included within the Preferred Option.

2.2. The NPPF and Practice Guidance set out a clear approach to defining housing need and then developing a housing target. This is summarised in Figure 1 below. First, an Objectively Assessed Housing Need (OAN) for Rugby Borough must be identified. Then the following must be considered:

- Unmet need from other areas: this is discussed in the second section of this report;
- Land supply, constraints and sustainability appraisal; evidence relating to this is outlined in full detail in section 2 of this report;
- Aligning housing and economic strategy; this is discussed in the Employment Background Paper.

### **Step 1: Objectively Assessed Need for Housing in Rugby Borough**

2.3. The National Planning Policy Framework (NPPF) (March 2012)<sup>1</sup> sets a presumption in favour of sustainable development<sup>2</sup> whereby Local Plans should meet objectively assessed need for housing with sufficient flexibility to respond to rapid change, unless the adverse impacts of doing so would significantly or demonstrably outweigh the benefits or policies within the NPPF indicate that development should be restricted.

2.4. Paragraph 47 of the NPPF sets out that to significantly boost the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies in the framework, including identifying key sites which are critical to the housing strategy over the plan period.

2.5. The core evidence for housing requirements is a Strategic Housing Market Assessment (SHMA) for the housing market area. The preparation of a SHMA is intended to be the primary means of determining policies for future housing provision and this is to be brought together with evidence of land availability in order for a housing target to be decided.

### **Strategic Housing Market Assessment**

2.6. Paragraph 159 of the NPPF states that local planning authorities should have a clear understanding of housing needs in their area. Authorities must produce a SHMA to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.

2.7. The NPPF outlines that a SHMA should identify the scale and mix of housing and the range of tenures which the local population is likely to need over the plan period which:

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<sup>1</sup> <http://planningguidance.planningportal.gov.uk/>

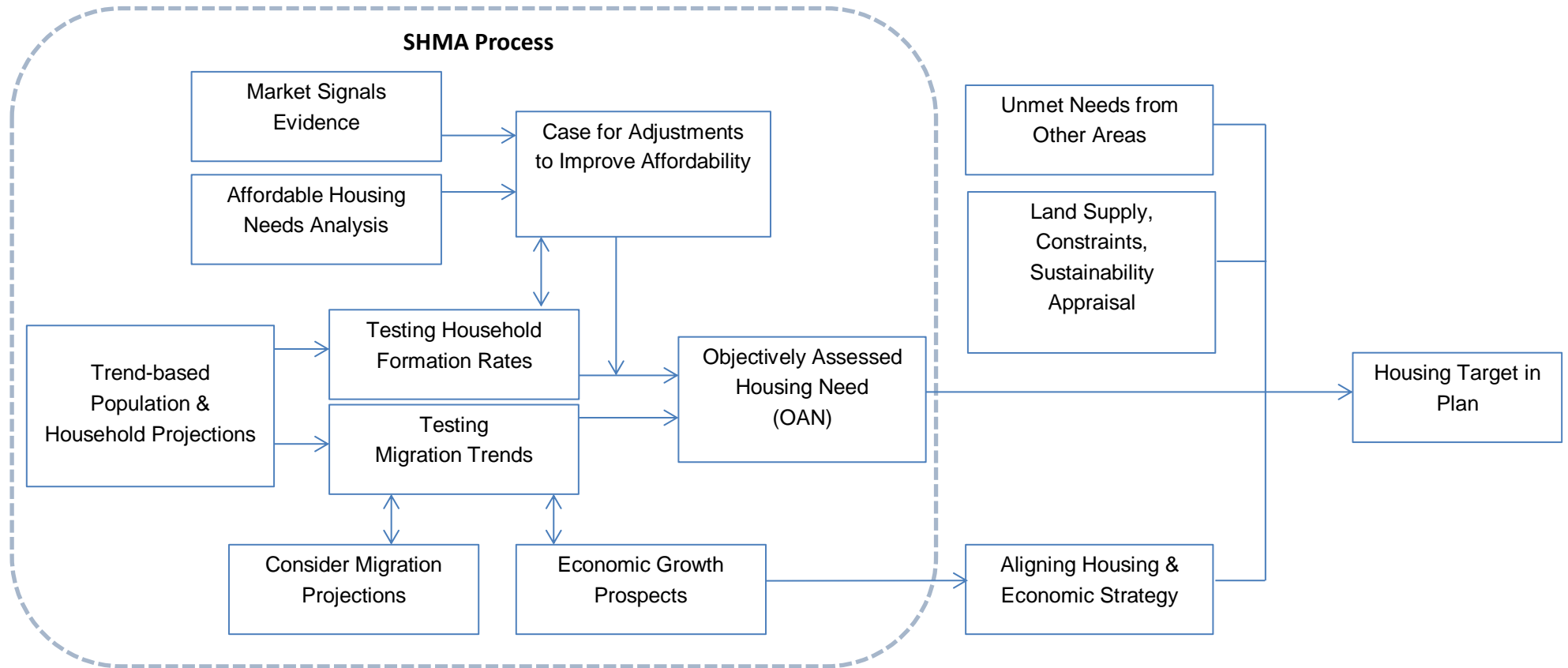
<sup>2</sup> Paragraph 14

- Meets household and population projections, taking account of migration and demographic change;
- Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community; and
- Caters for housing demand and the scale of housing supply necessary to meet this demand.

2.8. A joint SHMA (JSHMA) was commissioned by the Coventry and Warwickshire authorities as this was considered to be the relevant housing market area, in which the authority is located within. The justification for this study area is contained within the JSHMA evidence itself; this has been accepted as a sound HMA for assessment by Inspectors during the examination of Stratford District and Warwick District Council's Local Plan.

2.9. JSHMA evidence was commissioned jointly by the Coventry and Warwickshire authorities (with the exception of Stratford on Avon District Council) and undertaken by GL Hearn.

**Figure 1: Identifying a Housing Target**



Reference: Strategic Housing Market Assessment, 2015. GL Hearn.

2.10. The first Joint JSHMA was published in 2013<sup>3</sup>. This was followed by an Annex that took account of updated household projections in 2014<sup>4</sup> (Stratford on Avon District Council became part of this commission). A further update of evidence was undertaken in 2015<sup>5</sup> and is the Council's most up to date evidence, which has informed the Preferred Option.

2.11. The methodology employed to undertake the JSHMA is shown in Figure 1 above. The findings of the JSHMA process are outlined in detail within the 2015 report and will therefore not be repeated here.

2.12. The JSHMA has identified an objectively assessed housing need for Rugby Borough of 9,600 dwellings between 2011 and 2031.

### **Step 2a: Considering unmet needs from other areas**

2.13. As stated in the introduction to this section, a housing target can only be arrived at once the land supply and constraints of an area have been considered. Each of the authorities within the Coventry and Warwickshire area are at a differing stage of plan making process and some have identified capacity for residential development. Of most significance to Rugby Borough is the capacity of Coventry City to provide housing.

2.14. The NPPF states: *"Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans [para 179]."*

2.15. Paragraph 182 of the NPPF is also clear that plans should be positively prepared, meeting unmet needs from neighbouring authorities *"where it is reasonable to do so and consistent with achieving sustainable development."*

2.16. In September 2014 Coventry City Council published a consultation document on its Emerging Local Plan entitled Delivering Sustainable Growth<sup>6</sup>. In that document Coventry City Council acknowledged the conclusions of the JSHMA Annex (2014) and the higher levels of housing provision it indicated was required in the city. However, the document also reported that, on the basis of evidence available at that time, there would be a shortfall of up to 13,720 dwellings against these requirements because of capacity constraints within the City.

2.17. Since this initial indication of a capacity issue, the Coventry and Warwickshire planning authorities have worked together to identify a distribution of housing that will need the full objectively assessed needs identified within the JSHMA 2015 update and address the capacity issue demonstrated by Coventry City Council. This work culminated in a Memorandum of Understanding between the Coventry and Warwickshire authorities that was formally endorsed by Rugby Borough Council on October 27<sup>th</sup> 2015<sup>7</sup>.

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<sup>3</sup> [https://www.rugby.gov.uk/downloads/file/194/strategic\\_housing\\_market\\_assessment\\_shma](https://www.rugby.gov.uk/downloads/file/194/strategic_housing_market_assessment_shma)

<sup>4</sup> [https://www.rugby.gov.uk/downloads/file/195/strategic\\_housing\\_market\\_assessment\\_shma\\_-\\_annex](https://www.rugby.gov.uk/downloads/file/195/strategic_housing_market_assessment_shma_-_annex)

<sup>5</sup> [https://www.rugby.gov.uk/downloads/file/194/strategic\\_housing\\_market\\_assessment\\_shma\\_joint\\_update](https://www.rugby.gov.uk/downloads/file/194/strategic_housing_market_assessment_shma_joint_update)

<sup>6</sup> [http://www.coventry.gov.uk/downloads/download/3346/the\\_new\\_coventry\\_local\\_development\\_plan\\_-\\_delivering\\_sustainable\\_growth](http://www.coventry.gov.uk/downloads/download/3346/the_new_coventry_local_development_plan_-_delivering_sustainable_growth)

<sup>7</sup> <https://www.rugby.gov.uk/meetings/meeting/634/council>

2.18. Against the need identified within the JSHMA 2015 update the City has a shortfall of 17,800 dwellings between 2011 and 2031 and this will be distributed between the Warwickshire authorities. The agreed redistribution methodology results in 2,800 of these dwellings being provided within Rugby Borough during the 2011-2031 plan period.

## Step 2b: Land Supply, Constraints, Sustainability Appraisal

### Land Supply – Strategic Housing Land Availability Assessment (SHLAA)

2.19. A total of 9,787 dwellings are committed in Rugby Borough. A full housing trajectory detailing the assumptions made about the phased delivery of these dwellings within and beyond the emerging Local Plan period.

2.20. The Strategic Housing Land Availability Assessment (SHLAA) contains information about all sites submitted for consideration as part of the development of the emerging Local Plan and the assessment of them. It outlines evidence about capacity for development within the Borough. The total quantity of housing that could be provided upon sites that the SHLAA has concluded are suitable, available and achievable is 21,169 dwellings, this is broken down by location in figure 2 below.

**Figure 2: SHLAA 2015 Capacity table**

Capacity Scenarios	Capacity
Rugby Urban Area	130
Rugby Urban Edge– non Green Belt	9,060
Rugby Urban Edge – Green Belt	275
Main Rural Settlement Edge – non Green Belt	263
Main Rural Settlement Edge – Green Belt	5,746
Coventry Urban Edge	5,695

2.21. The combination of currently committed sites and those found to be developable or deliverable within the SHLAA indicates that there is sufficient land supply within the Rugby Borough to deliver housing that would meet the needs of Rugby Borough and also accommodate growth from Coventry.

### Constraints

2.22. Green Belt is the most significant constraint to development within Rugby Borough. The SHLAA has concluded that many sites within the Green Belt are suitable for development if they were not located within this area of constraint.

2.23. The NPPF is clear that once established, Green Belt boundaries can only be altered in exceptional circumstances. The SHLAA indicates that there is theoretical capacity for 9,453 dwellings outside the Green Belt. A full discussion about whether the required levels of housing can be delivered, outside the Green Belt, within the plan period is contained within section 2 of this document. It is sufficient, for the purposes of this exercise, to conclude that whilst there are



constraints present within Rugby Borough, these constraints do not significantly limit the ability of the Council to find sufficient land to meet the housing target.

### **Sustainability Appraisal**

2.24. A Sustainability Appraisal Report has been prepared by LUC, on behalf of Rugby Borough Council (the Council) as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the emerging Rugby Borough Local Plan.

2.25. Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment, and set the framework for future consent of projects requiring Environmental Impact Assessment (EIA). The purpose of SEA, as defined in Article 1 of the SEA Directive is 'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'.

2.26. If, through the development of the Local Plan the SA process identifies potential adverse impacts which cannot be mitigated against, action must be taken accordingly and changes will be made to the plan.

### **Step 2c: Aligning Housing and Economic Strategy**

2.27. A discussion on this point is included within the Employment Background Paper. That paper concludes that levels of employment provision proposed within the Preferred Option align with the levels of housing required to meet Rugby Borough's OAN. It is not necessary to align employment provision, within Rugby Borough, to the housing provision made as a result of the redistribution from Coventry.

## A housing target for Rugby Borough

2.28. The JSHMA September 2015, has identified an objectively assessed housing need figure for the Borough of 9,600 dwellings within the plan period. However, it has been demonstrated that there will be unmet housing need emanating from Coventry within the plan period and this is something Rugby Borough Council has to consider. A redistribution methodology has been developed by the Coventry and Warwickshire planning authorities and this allocates a further 2,800 dwellings to Rugby Borough. The housing target therefore becomes 12,400 dwellings in the plan period.

**Figure 3: Components of the Housing Target**

	<b>Total (2011-31)</b>
Rugby OAN	9,600
Coventry unmet need	2,800
<b>TOTAL</b>	<b>12,400</b>

2.29. Whilst the Council has 9,787 dwellings benefiting from planning permission<sup>8</sup>, yet to be developed, it is envisaged that only 5,565 will be delivered by 2031. Therefore in order for the Local Plan to accord with national planning policy it will be required to make further allocations to ensure the delivery of 12,400 dwellings within the plan period.

2.30. As reported in the above, the SHLAA demonstrates there is physical capacity for these gross numbers within the Borough and they could also be accommodated outside the Green Belt. However, achievement of this gross target is reliant upon the right distribution strategy which will be informed by detailed review of land supply and constraints. This will also determine whether Green Belt release is necessary. The conclusion of this exercise is contained within section 2 of this Paper.

2.31. The housing target also aligns with employment provision, as shown in the Employment Background Paper.

2.32. If this housing target were to be achieved as an annualised average across the plan period, a total of 620 dwellings per annum would be required. The following paragraphs consider performance against this target to date and how it could be delivered across the plan period.

### **Performance against the housing target to date**

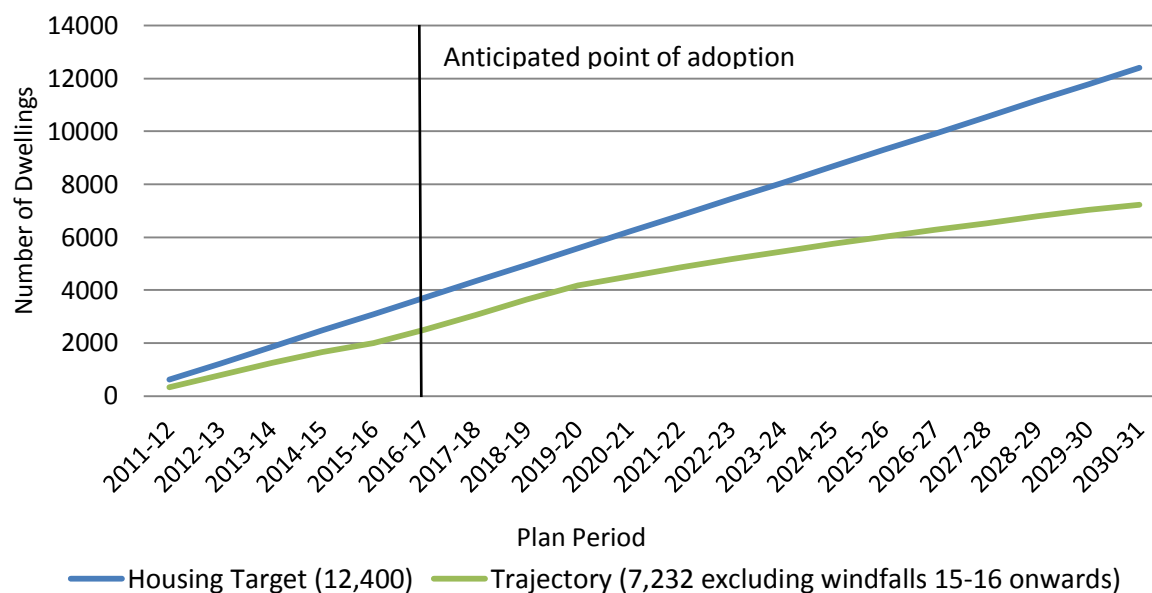
2.33. During the period of April 2011 to March 2015, 1,667 dwellings have been delivered within Rugby Borough. Against the proposed housing target of 620 per annum, the requirement in the same period of time would have been 2,480. There is therefore a shortfall of 813 dwellings within this period. It should also be noted that there is also a shortfall of 253 dwellings when measured against the Rugby OAN only within the same time period.

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<sup>8</sup> Sites 5 dwellings or more benefiting from full or outline planning permission or subject to signed s106

2.34. As displayed in figure 4, based on the current housing trajectory (Appendix 1) the Council will consistently have a shortfall against the proposed housing target (5,168 excluding windfalls) throughout the plan period. As outlined above, there will also be an under delivery at the time of adoption of the Local Plan. There are two implications that will result from this circumstance.

**Figure 4: Housing Trajectory – Cumulative target and commitments**



2.35. The first is that this shortfall will need to be addressed by the Plan. The Planning Practice Guidance states that any undersupply against housing targets should be dealt with in the first five years of the plan period where possible. The Council will therefore aim to address undersupply against the housing targets within the first five years post adoption.

2.36. In addition to this requirement to address the shortfall in the first five years post adoption, the implications of paragraph 47 of the NPPF must be considered. This places a requirement upon local planning authorities to demonstrate a five year land supply and contains implications for the calculation of this supply where an area can be considered to have ‘persistently under delivered’. In these circumstances, a 20% buffer should be applied to housing targets, with delivery moved forward from later in the plan period.

2.37. At the time of this consultation, the Borough Council cannot demonstrate a five year supply against housing targets contained with the adopted Core Strategy (see Annual Monitoring Report, December 2015, available on 31/1/2015) and considers it has consistently under delivered against this target; the 20% buffer is therefore applied to calculations of five year supply against currently adopted target and the undersupply.

2.38. As highlighted in figure 4 this position is unlikely to change before the point of adoption, with the number of dwellings currently in supply being lower than both the currently adopted housing target and the annualised housing target of 620 dwellings per annum. The Council therefore anticipates that, at adoption, it will be required to demonstrate a five year land supply that delivers

sufficient housing to resolve the identified shortfall, within five years, plus the 20% buffer required by the NPPF. In order to provide a conservative assumption of requirements, it is currently assumed that this 20% buffer will apply for the first five years post adoption.

2.39. Should the housing target of 620 be backdated to 2011, at the anticipated time of adoption (2017), the Borough Council would need to plan for 1,018 dwellings per annum for the first five years of the plan.

2.40. However, the Council considers that it would be unreasonable to expect the target of 620 to be applied retrospectively back to 2011. This is based on the fact that the Council, through its Core Strategy, has been planning for a housing target sufficient to meet the objectively assessed need for Rugby Borough of 480 dwellings and the uplift to 620 is only as a result of the Borough Council committing to play its role in meeting the unmet need within the housing market area identified in the most recent JSHMA.

2.41. Further, as the following sections of this paper demonstrate, this high initial annual target will be unachievable due to the availability of sites and inability of the market to deliver such a rapid increase in annual delivery rates. If the Council were able to release sufficient land into supply, it is likely that land in unsustainable locations would have to be released. The NPPF is clear, as stated, that whilst unmet need from another area can be provided for, this should not happen to detriment of sustainable development.

2.42. The Council proposes therefore to measure performance in the years before adoption against the objectively assessed need figure of 480 dwellings per annum. The Council acknowledges that this will result in the housing target not being achieved on a consistent annualised basis and that the housing target from the point of adoption to 2031 will have to exceed 620 per annum, in order to ensure the gross target of 12,400 is achieved. The delivery of 2,800 dwellings over the remaining 14 years of the plan period, post adoption, equates to a target of 680 dwellings per annum.

2.43. At the point of adoption (mid 2017) the Council envisages a shortfall of 292 dwellings against the target of 480 per annum; this will be met within the first five years of the plan. Whilst it is considered that a buffer should not be applied to the unmet need arising from the housing market area, it is accepted that this buffer will apply to shortfall against the target of 480 dwellings per annum.

2.44. Figure 5 demonstrates how the housing target will be calculated for the first years of the period, post adoption.

**Figure 5: NPPF compliant annual target at the point of local plan adoption**

A	Annual requirement at point of adoption	480
B	Five Year Housing Target at point of adoption (2011-16/17)	2880
C	Anticipated Completions (2011-2016/17)	2588
D	Undersupply (B-C)	-292
E	Coventry unmet need annualised across post adoption plan period (2,800/14)	200
F	Plan Target Post Adoption (A+E)	680
G	5 year requirement 2017/18-2022/23 (F*5 +D +20%)	4430
H	Annualised requirement 2017/18-2021/22 (G/5)	886

2.45. To understand how the Council will perform, subsequent sections of this report look at different spatial options within the Borough and their capability of meeting 886 dwellings per annum for the first five years of the plan (post adoption) then lowering to 714 dwellings, with the buffer returning to 5%. It is understood that the buffer does not increase the housing target and this approach does not take account of managed supply i.e. impact of over/under supply against the housing target on an ongoing basis throughout the plan.

### **Conclusion**

2.46. As stated, the Council is proposing a housing target for Rugby Borough of 12,400 dwellings for the plan period 2011-2031. The housing target per annum post adoption has been outlined above. Figure 4 has clearly demonstrated that to achieve this, the Council will be required to allocate further land for housing. The following sections of this paper turn to the distribution strategies employed to achieve this.

### **3. DISTRIBUTION OF HOUSING**

3.1. Rugby Borough Council needs to consider where the most sustainable and deliverable locations are in the Borough to meet the housing needs identified through to 2031. This part of the background paper considers the potential role of each different location typology within the Borough in meeting this need.

#### **What has been the recent strategy for distributing housing in Rugby Borough?**

3.2. Rugby Borough has a straightforward settlement hierarchy. There is one principal urban area, Rugby, which is surrounded by a collection of villages of varying sizes. As a result, Rugby town has historically been the primary focus for growth within the Borough. Although there is a clear hierarchy of settlements within the Borough, it shares boundaries with several authority areas, some of which are urban boundaries, such as Coventry and Hinckley.

3.3. The Local Plan 2006 made provision for a maximum of 3710 new dwellings between 2006 and 2016 which equated to 309 dwellings per annum. The strategy within this Plan was that 87% of the new housing provision would be made in Rugby, Long Lawford and Dunchurch. All of the sites allocated within the plan were within the urban area. Safeguarded housing sites were designated within Long Lawford, Wolston and Ryton on Dunsmore but not allocated. The sites within Wolston and Ryton on Dunsmore were safeguarded with the specific intention of meeting the longer term needs of these communities, particularly given their relationship to Coventry, if this should prove necessary.

3.4. The Core Strategy was adopted in June 2011 and is the current development plan for the Borough. The Core Strategy contained plans for the provision of 10,800 dwellings between 2006 and 2026 at a rate of 540 dwellings per annum. It is specifically stated within the Core Strategy that at least 9,800 (approximately 90% of the total target) of that housing provision would be directed to Rugby town, as the most sustainable location in the Borough. This was to be achieved by the allocation of two strategic urban extensions to the town, Rugby Radio Station and Rugby Gateway (Eden Park), and a collection of sites named the South West Broad Location were stated to be a further growth location should the allocated sites not deliver as anticipated.

#### **Are we proposing a change to the existing strategy?**

3.5. Significant levels of growth to Rugby town have already been permitted under both the 2006 Local Plan and the Core Strategy. Most of this growth will take place upon the urban extensions allocated within the Core Strategy, the Rugby Gateway (Eden Park) and Rugby Radio Station, which total 7,500 houses. Other sites within supply, or subject to signed S106, will provide an additional 2,514<sup>9</sup> dwellings. 9,471 of these 9,787 committed dwellings will be built either within or immediately adjacent to the urban edge of Rugby town. Whilst it is not anticipated that all of these houses will be delivered within the plan period, it is clear that the Rugby urban area will continue to be the primary focus for growth within the Borough during the 2011-2031 plan period.

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<sup>9</sup> Sites of 5 dwellings or more

3.6. Whilst this quantity of housing is permitted, the anticipated timing of its delivery is problematic, as referred to in the preceding sections.

3.7. A lack of housing delivery has been a national problem during the recessionary period and this provides part of the explanation as to why the higher rates of delivery seen in 2006-2008 have not continued to the present day. However, the primary principle of the distribution strategy contained within the Core Strategy was the allocation of two strategic sites and the larger of these, Rugby Radio Station, which has failed to commence delivery in the timeframes the Council has anticipated. Whilst other land has been put into housing supply in that period, none of those additional commitments (such as Cawston Extension and Cawston Lane) have commenced and the lack of supply has continued.

3.8. In 2014 the Council consulted upon a Development Strategy Paper. This paper highlighted the issues that the Council had encountered in demonstrating the required five year supply of housing land. At that time, this issue was also exacerbated by evidence of higher levels of housing need contained within the 2013 JSHMA. The Council reported that it considered the settlement hierarchy contained within the Core Strategy was compliant with national planning policy and could continue to direct growth in the Borough; the Council continues to hold that view.

3.9. The Council has therefore used the hierarchy contained within the Core Strategy when considering its options for further site allocation. The continuing role of the urban area as the focus for growth has been evaluated and this has informed consideration of the role of the rural area.

#### **What are the Reasonable Options to meeting the housing target?**

3.10. The options considered have been put together primarily for the purpose of the Sustainability Appraisal. The set of options below, are considered to represent all reasonable alternative options for meeting the growth targets to be delivered through the emerging plan. Rugby Town is consistently listed as the main focus for growth for reasons already outlined. The variation in option is therefore about the role that the rural area should take in meeting strategic housing targets.

**Figure 6: Spatial Options**

<b>Option</b>	<b>Distribution Detail</b>
Option 1: Existing balance	Main focus is Rugby Town via infill development or urban extension; Main Rural Settlements (MRS) development occurs within existing settlement boundaries; Local Needs Settlements (LNS) are limited to development that meets an identified need only.
Option 2: Urban and Urban edge focus	Main focus is Rugby Town via infill development or urban extension; Where Rugby Town cannot accommodate all growth, additional development is focussed upon the edge of Coventry and Hinckley urban area; Some boundary alterations are made to MRS; LNS are limited to development that meets an identified need only.
Option 3: Wider Focus	Main focus is Rugby Town via infill development or urban extension; Some boundary alterations are made to MRS;

	LNS are limited to development that meets an identified need only.
Option 4: Intensified Urban Focus	Main focus is Rugby Town via infill development or urban extension; MRS are limited to development that meets an identified need only; LNS development is restricted
Option 5: New Town	Main focus is Rugby Town via infill development or urban extension; Where Rugby Town cannot accommodate all growth, additional development is focussed in a new MRS development. LNS accommodate small scale infill development.

3.11. The following sections of this Paper outline the evidence available to the Council in considering each of the tiers within the settlement hierarchy and the role they can play in meeting the strategic growth target. Each tier is addressed in turn, starting with the urban area as the most sustainable location for growth in the Borough and main focus in each option. Tiers that exist within the rural area are then considered, in order of general sustainability.



## **RUGBY TOWN (URBAN AREA): THE PRIMARY FOCUS FOR GROWTH**

### **Evidence Base**

3.12. As stated in the opening paragraphs of this paper, Rugby town will remain the primary focus for growth within the Borough by virtue of the levels of development already permitted within the urban area and immediately adjacent to it. Planning permission has been granted by RBC for over 9,000 dwellings in this area. The majority of the housing required to meet the objectively assessed housing need of the Borough has, theoretically, therefore been identified and approved. However, as has been detailed, the timing of housing delivery upon these permitted sites has not achieved the Council's targets and this quantity of housing is insufficient to meet the whole housing target.

3.13. The SHLAA has identified that there is very little capacity for further development within Rugby town itself (130 dwellings) and that this will not meet the shortfall against the housing target. Whilst these sites may come forward, contributing to the achievement of the housing target, it is not necessary to allocate them as part of this plan due to their small nature.

3.14. On this basis, it is through the continued extension of Rugby town that its function as the primary focus for growth will be fulfilled. SHLAA findings indicate that there is sufficient land on the urban edge to meet the gross housing target.

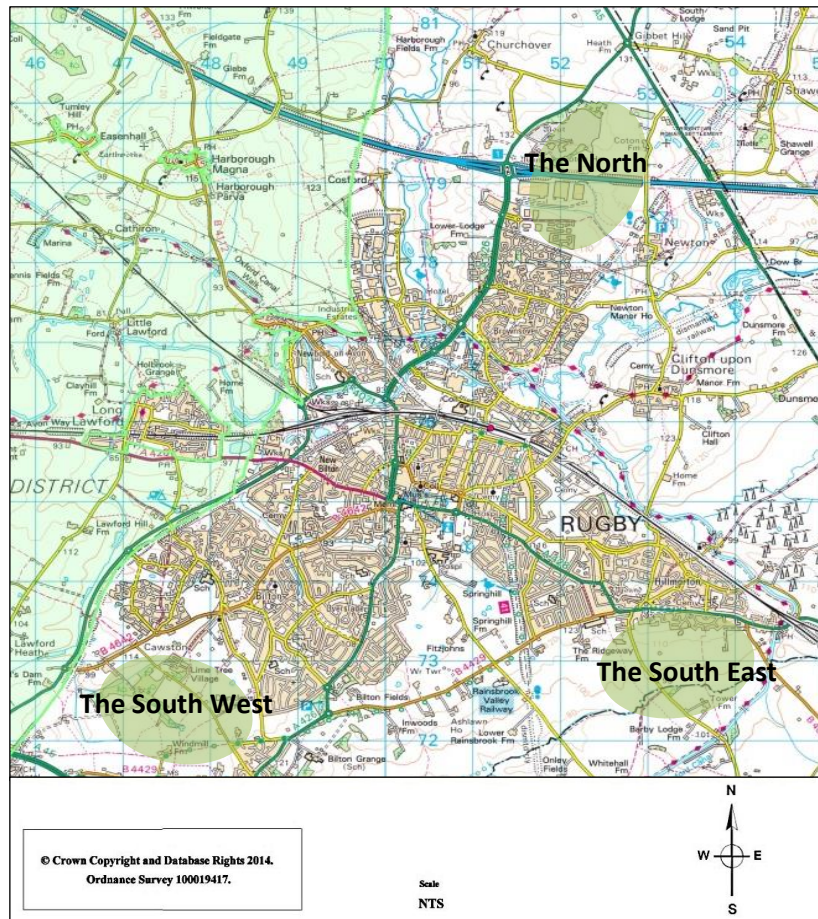
3.15. Given the shortfall between the number of currently committed dwellings and the housing target, the Council has sought to identify large scale urban extension options that will deliver sufficient quantities of housing but also be able to provide required levels of infrastructure. To this end, site options available on the urban edge of Rugby and outside the Green Belt have been grouped into three broad locations. These are to the north, south east and south west of the town, as shown on the plan overleaf. The SHLAA contains information about these sites individually.

3.16. In assessing each site as a potential option, consideration must also be given to the anticipated timing of delivery on these sites, alongside those already committed and in particular whether they would enable the Council to be able to demonstrate a continuous 5 year supply of housing throughout the plan period. To this end, the Council commissioned GL Hearn to undertake a Housing Delivery Study. The purpose of the study was to develop a greater understanding about the rates of delivery that can be anticipated in the Borough and the strategies that would need to be employed if higher housing targets are to be put in place.

3.17. Further work, that is central to the evidence base relating to Rugby urban area and its edge, is consideration of the capacity of infrastructure to accommodate growth additional to that already committed. Infrastructure requirements will be fully addressed as part of the production of the Submission Version Local Plan but the Council has sought to understand the position in relation to highway capacity as best it can as this Preferred Option has been developed. Warwickshire County Council (WCC) have been commissioned to provide initial evidence, based on the detail currently available about potential sites, about what capacity exists within the transport network across Rugby town to accommodate additional development alongside that which is already committed.

3.18. The combination of the transport and deliverability work has helped to inform the preferred options housing distributions strategy. Both evidence have been published for public consultation in support of the Preferred Option and can therefore be fully reviewed and commented upon. The findings of this work are summarised below.

**Figure 7: Broad Locations adjacent to Rugby Town**



### Rugby Transport Work

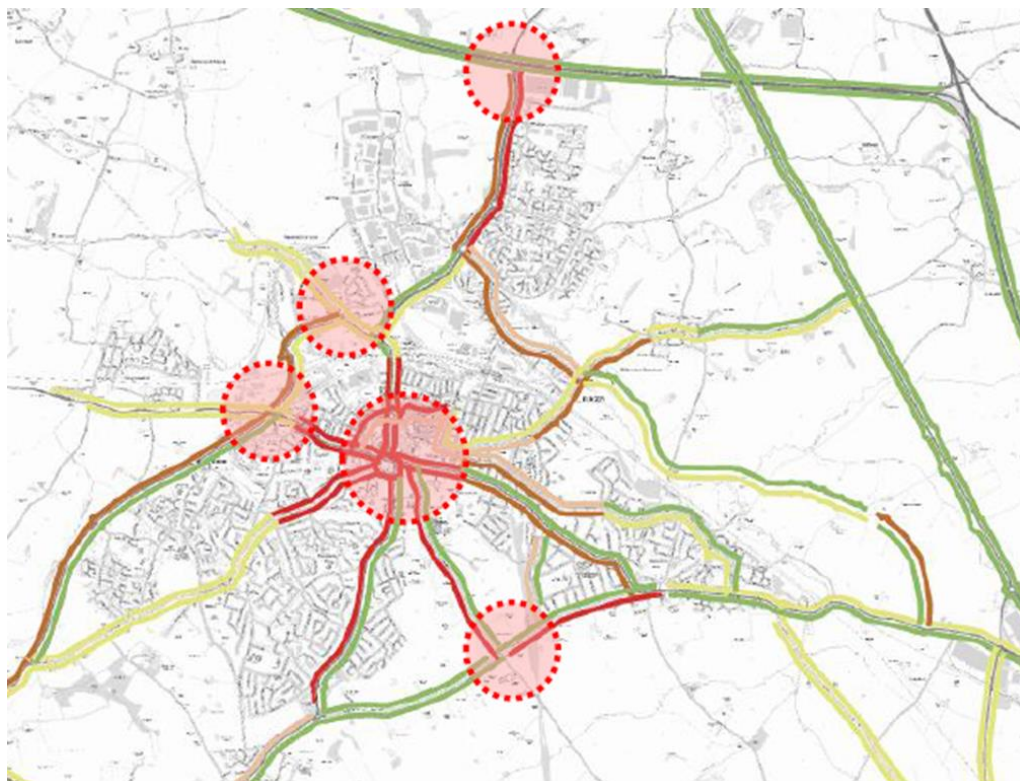
3.19. Warwickshire County Council (WCC) were engaged to consider, at a high level, what capacity exists within the transport network across Rugby town to accommodate additional development alongside that which is already committed. The transport work was undertaken in two phases. The first phase considered, at a high level, the impact of all of the Rugby Town urban edge SHLAA submission sites considered to be suitable being delivered by 2031, alongside developments already committed.

3.20. This work was informed by the content of SHLAA submissions made in relation to urban edge sites. All potential urban edge sites were included in Phase 1 work<sup>10</sup>, regardless of the conclusions SHLAA assessment which had not been completed at the time. This allowed for full testing of all potential urban edge sites i.e. it was a maximum scenario.

<sup>10</sup> [https://www.rugby.gov.uk/directory\\_record/5798/preferred\\_options\\_transport\\_evidence\\_2015\\_-\\_warwickshire\\_county\\_council/category/86/reviews\\_studies\\_and\\_assessments](https://www.rugby.gov.uk/directory_record/5798/preferred_options_transport_evidence_2015_-_warwickshire_county_council/category/86/reviews_studies_and_assessments)

3.21. The transport work utilised the transport modelling to identify specific impacts on the highway network within the town, which are identified in the below plan. The larger the circle, the greater the impact felt at that point on the network.

**Figure 8: Impact on journey time in Rugby from all 'suitable' Rugby town SHLAA submissions**



3.22. It is clear from figure 8, that these levels of development upon the urban edge would cause significant issues at the gyratory, in the town centre. The gyratory is extremely tightly bounded and offers very little scope for mitigation to reduce the impacts that would be experienced. This is considered to be a very big constraint to additional growth in the town. Similar to the gyratory, the Butlers Leap and Rugby Road junction show impacts where the mitigation options are unclear. Given their location at the centre of Rugby, WCC are of the view that all additional SUEs would create some impact on both key town centre infrastructure.

3.23. Other impacts identified through the modelling work are north of Rugby town centre, along the A426. Although there is potential for signalisation and roundabouts on the A426, there is clearly a significant impact. Journey times in west Rugby from the south west of Rugby to the M6 are also identified and would require mitigation from the sites promoted in the south west. In general the modelling found impact on the network worse in the town in the AM peak than the PM peak.

3.24. The second phase of transport work<sup>11</sup> tested the impacts of allocating housing in each of the broad locations, in order that the location with the lowest additional impact could be identified and, thus, brought forward sooner than the other areas. At this time, more detailed assumptions could be made about the sites to be assessed and the resulting quantum of housing. Whilst the scenarios tested may not reflect the information understood about these sites now, the assumptions did allow for initial testing of potential development scenarios.

3.25. The urban edge SHLAA submissions were considered in three broad locations: the north, south east and south west in order to understand the urban extension options for Rugby.

### **Overall transport assessment conclusions**

3.26. In concluding the outputs of the modelling work, the following observations were made:

- The South-western model network performs best and the South-eastern network performs worst. The assessment therefore considers it reasonable to conclude a preference for delivery in transport impact terms of the South West option, then the Northern option, and lastly the South-eastern option on account of the fact that this option returns the highest increases in delay and the greatest number of increases in queues at key junctions.
- The provision of a southern distributor link in part, within the development allocation area, is considered essential for the SW and SE options.
- Despite this the model outputs identify residual impacts which will require further mitigation. These however can only be identified once an allocation option is taken forward for detailed analysis.
- The high level analysis indicates that the level of housing that has been tested for the South-eastern allocation is likely to generate traffic levels which reach, and in some cases exceed, the network capacity even after mitigation measures. It concludes the option is only likely to be feasible in transport terms once the south-western allocation is built out, inclusive of the link road. Although further work is recommended before a conclusion can be fully determined.
- The Northern scenario at the PM network performs better than the SE option whilst the AM network is the worst performing network. Potentially this problem may relate to the conflict between traffic entering the study area to travel to work in Rugby Centre and traffic leaving Rugby along the A426 to travel to work via the M6. Further analysis of the potential implications of these conflicts is recommended if this option is to be taken forward.
- It is clear that the work undertaken so far has been high level and does not identify potential detailed mitigation solutions. In some instances additional work is needed on particular crunch points identified, such as the Gyratory, to unlock, if possible, further mitigation solutions. However, further analysis will need more detailed input on potential schemes in terms of access and land uses in order to process the modelling work. The Phase 2 report provides more detail on the additional work to be undertaken, which will feed into the development strategy to be contained within the Submission Local Plan.

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<sup>11</sup> [https://www.rugby.gov.uk/directory\\_record/5798/preferred\\_options\\_transport\\_evidence\\_2015\\_-\\_warwickshire\\_county\\_council/category/86/reviews\\_studies\\_and\\_assessments](https://www.rugby.gov.uk/directory_record/5798/preferred_options_transport_evidence_2015_-_warwickshire_county_council/category/86/reviews_studies_and_assessments)

## **The Deliverability of Housing in Rugby Town**

3.27. The Council appointed consultants GL Hearn to undertake a Housing Delivery Study. This study focused on what level of housing provision could be delivered within the Borough during the 2011-2031 plan period, taking account of site and market-based factors.

3.28. The report considers the potential timing and pace of delivery of residential development at two levels – at a site specific level; and at a strategic level looking at Rugby Town, and the Borough more widely.

3.29. In terms of site specific level, the study assessed the Council's housing trajectory to ascertain whether assumptions on its timing of delivery and the rates were reasonable. The study recommended an alteration to the assumptions for the Rugby Radio Station site with the number of dwellings anticipated to be delivered being reduced. It should be noted that the landowners, Urban and Civic, consider that they are capable of delivering more dwellings than that contained within the revised trajectory for the site.

3.30. Another key finding, that has informed the Preferred Options housing trajectory, was the study highlighting that Rugby Town is a single market that contains a strong representation of large strategic sites but that these sites provide a comparative and competitive housing offer. The only difference between the large, edge-of-town sites is the quality of built product offered by each scheme, which varies by developer, therefore there is limited incentive for housebuilders who are already bringing forward schemes on the edge of Rugby, to bring forward additional sites within Rugby Town and market both sites concurrently. The delivery of additional SUEs in Rugby town is, in effect, limited by the number of volume house builders already involved in schemes in the town. Of the sites that are committed all of the Borough's large-scale residential development schemes are being / expected to be developed by national/regional housebuilders, the majority of the national housebuilders are expected to have sales points at these sites.

3.31. The housing delivery study therefore considers that continuing a strategy focusing growth on the urban area, would not be unrealistic as the urban area and edge of urban area could achieve the same average rate of delivery as previously achieved through the Core Strategy and Local Plan. However, GL Hearn considers an anticipated rate of delivery in the Rugby town market area of 470 – 520 dwellings per annum could be realistically be achieved as most national housebuilders are already involved in existing schemes on the edge of Rugby Town. This means that further allocation of large strategic sites on the edge of Rugby Town is unlikely to increase housing delivery rates. This approach would more likely provide a ready supply of sites to be brought forward later in the plan period, once the existing approved schemes are nearing completion. To help address the Borough's land supply issue and to deliver a higher housing target than currently being planned for would require broadening the range of organisations and spread of locations that deliver new homes. GL Hearn conclude that there is potential for smaller housebuilders to contribute to boosting delivery in the short to medium term through the delivery of smaller schemes within the urban area or at smaller settlements. This could assist with early delivery and the achievement of a five year supply of supply. GL Hearn also conclude that development at Coventry fringe locations would relate to a



different local market than that in or adjoining Rugby town and would not compete directly with the consented sites.

### Urban area evidence conclusions and site selection

3.32. The high level transport modelling demonstrates that there is a limit on how much more traffic Rugby town's existing network can take before severe congestion is experienced, even when mitigation measures are considered. This is particularly the case in the town centre. When directions of growth are considered, it is clear that there are directions which require less transport mitigation than others and as such are more deliverable in transport terms. In this instance the South East performs the worst and can only be delivered once the South West has come forward which will enable the southern relief road. This mitigation is shown in the below plan:



3.33. Land promotion of land to the South West of Rugby has increased since previous call for sites exercises. The collection of land ownerships that are now being promoted present either a very large scale and comprehensive option for the entire area, or smaller scale strategic development in part of it. There are some areas of land that have planning permission and could therefore be contributing to housing delivery in the short term whilst other areas would have a lead in time before delivery could be secured. As result, the south west could contribute to housing delivery throughout the plan period. Deliverability evidence suggests that it is likely, however, that if the entire area was to be allocated delivery would extend beyond the plan period.

3.34. On that basis, the level of transport infrastructure likely to be required in order to support further allocation to the South East, within the plan period will not be provided. Therefore, whilst the sites within the South East are considered to be suitable for development within the SHLAA, development will not be able to coming forward in a comprehensive manner within the plan period in this location, due to transport constraints. In any event, these sites can only present longer term delivery options because they are not currently promoted as a consolidated option, nor are there housing developers involved. Before proposing allocation, attention would need to be given to the challenges that differing landownerships present in this area and the lead in times that would be

involved in bringing the area forward. This would need to be in the context of highways impacts, even when high level mitigation is considered.

3.35. The exception to this rule is the Ridgeway Farm site, which has the benefit of planning approval subject to a signed s106 agreement and it is accepted that there is potential for smaller sites to come forward within the south east broad location. However, consideration would need to be given to infrastructure requirements, landscape sensitivity and again the capacity for the urban edge to deliver further residential development from national/regional housebuilders.

3.36. Whilst highways issues may not (though this would have to be confirmed through further transport modelling work) be insurmountable, this is not a challenge that the Council needs to address in this plan, particularly because, if development was coming forward in the South West it is likely there would not be market capacity for further development in this location as well. As a result the release of this land would not contribute to the achievement of housing targets in the plan period. The Local Plan is seeking to masterplan development that is comprehensively delivered due to the known infrastructure concerns in the area. At this stage the Council is of the view that this cannot be achieved by sites to the South East of Rugby town and therefore these cannot be proposed for allocation in the Local Plan.

3.37. The collection of sites to the north of Rugby town provides an opportunity for housing provision throughout the plan period at a relatively consistent rate. The Coton House and Coton Park East sites have ongoing housing construction taking place at the moment and in both cases further strategic allocation in these areas would allow this delivery to continue later on into the plan period. There are two options available at Coton House; a smaller scale addition to the current planning permission or a much larger scale strategic expansion. In both cases, the presence of Coton House as a Grade II\* listed building is an important constraint. In respect of the larger Coton House submission, which is to the East and North of Coton House, the SHLAA considers that it is not a suitable development site due to the extent of the impact it would have on the setting of the Grade II\* listed building. It is considered at this stage, this would mean the site cannot be proposed for allocation.

3.38. On this basis, the South West and North broad locations present sustainable development opportunities. A final consideration is the extent to which these sites, alongside those already committed, could maximise the delivery potential of the urban edge and achieve the rate of delivery GL Hearn expect the town to be able to sustain. Answering this question has required a careful consideration of the finer details of these proposals including the rates of delivery anticipated by those in control of these sites and which house builders will be constructing dwellings. This detail has informed the assumptions made in developing the housing trajectory.

### **The Preferred Option: Urban Extension Allocations**

3.39. Ultimately, in order to maintain the role of Rugby town and as the principal focus for growth and maximize the potential of the Rugby urban edge to deliver housing, the Council is proposing to allocate all urban edge sites that have been considered suitable and available within the SHLAA process and achievable in light of transport evidence referred to above.

3.40. The detail of each proposed allocation and reasons for it are outlined below.

#### **Coton House**

The site will be allocated to provide up to 150 dwellings.

##### Reason for the allocation:

The redevelopment of the Coton House site commenced in 2015. Further allocation at this site can provide an extension to the existing approved development. Given the commencement of works on site, it is anticipated that delivery in this area will take place in the first five years of the plan period, assisting with five year supply. However, Coton House itself is a Grade II\* listed building and consideration of this will be integral to deciding the quantity of housing to be delivered.

#### **Coton Park East**

This site will be allocated to provide 855 houses.

##### Reason for the allocation:

The Coton Park East development site presents the opportunity to extend the existing Coton Park area, providing further housing and employment development. Houses have been being built in this area for over 10 years and this final extension will provide dwellings that will assist with achieving short term housing supply targets as well as steady delivery the midterm.

#### **The South West**

The site will be allocated to provide 5,400 houses.

##### Reason for the allocation:

The principle of growth to the South West of Rugby town has been accepted within existing local planning policy which stated that the South West Broad Location would be developed if allocated urban extensions did not deliver housing in the required timescales. The allocation proposed as part of this Local Plan covers a larger area than the previous Broad Location and encompasses some sites that already have planning permission.

It is not anticipated that the total quantum of housing that this collection of sites can provide will be delivered within the plan period. Evidence available to support this Preferred Option suggests that this allocation can deliver approximately 2,570 dwellings within the plan period as below:

Coventry Road, Bilton	150
Cawston Extension	113
Land South of Alwyn Road	910
Bilton Fields, Ashlawn Road	500
Cawston Spinney	900

The allocation of this total area provides a very important opportunity to masterplan development, identifying all required constraints and infrastructure capacity issues in order to ensure that these are properly addressed through the phasing of development. This is especially important for transport mitigation and education investment.



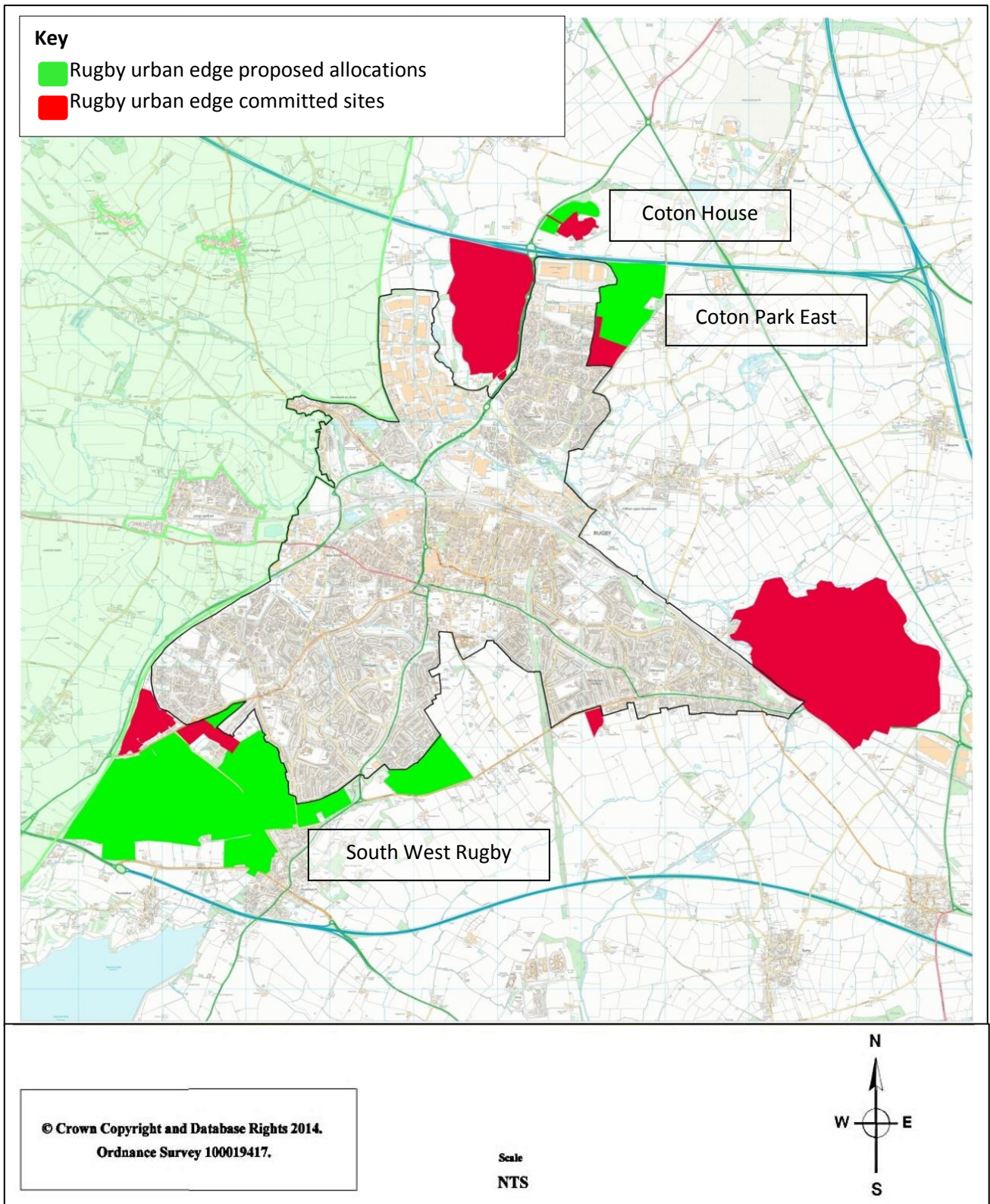
**Reason for the Preferred Option:**

3.41. In making these allocations the Council is seeking to ensure it maximises the potential for housing delivery on the urban edge of Rugby, throughout the plan period. To this end, many of the urban edge sites promoted have been selected for allocation.

3.42. The total, gross quantity of housing allocated on Rugby urban edge as a result of these allocations will be 5,400 dwellings (inclusive of the wider Cawston Extension area which already benefits from planning permission). This total potential quantum of housing far exceeds what can reasonably be expected to be delivered within the plan period. The Council therefore considered splitting the South West Rugby area in order to allocate sufficient land to deliver its maximum potential within the plan period. However, the Council is of the view that the allocation of all land ownerships in this area presents an important opportunity to masterplan the development of the entire area, ensuring the infrastructure requirements are properly identified and appropriately phased. The Submission Version of this emerging Local Plan will contain detail about the policy mechanisms that will be put in place to ensure the sustainable delivery of housing and the infrastructure required to support it.

3.43. It is anticipated that Coton House and Coton Park East will complete within the plan period. Both sites will be located immediately adjacent to existing development sites that are currently being built out. In particular the Coton Park East site will benefit both from the existing access and the consistent delivery at the urban extension. Development to the South West of Rugby is anticipated to continue after 2031. As a result, the proposed allocations do not represent an over allocation within the plan period.

3.44. The plan below shows the proposed allocations. The Council considers this combination of sites maximises the potential of deliverable sites on Rugby's urban edge as a primary focus for development.



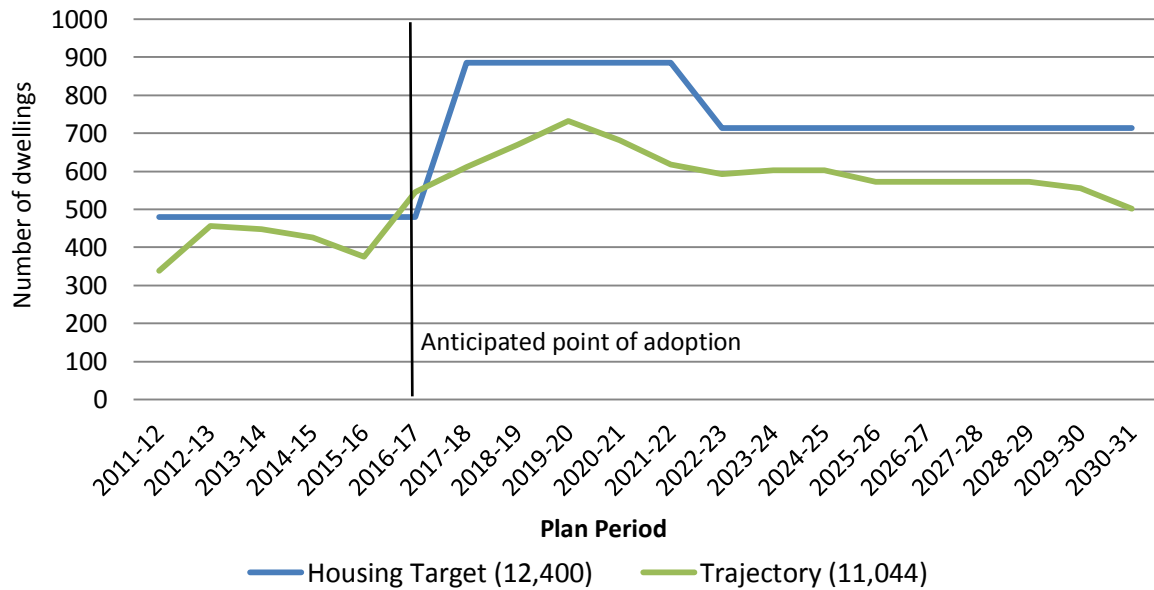
### URBAN AREA CONCLUSIONS

3.45. Figure 9 below indicates the impact these proposed allocations have upon the anticipated housing trajectory for the plan period. It is clear that these sites alongside existing commitments and an allowance for windfall sites, would not be sufficient to meet the housing target of 12,400, with a

shortfall of 2,105 dwellings being present. The housing trajectory is detailed in appendix 1 to this document.

3.46. Further, as highlighted in the graph below, the urban edge allocations do not result in sufficient land being placed into supply to meet short term targets, as required by the NPPF, post adoption.

**Figure 9: Housing Trajectory – Commitments and proposed urban edge allocations**



3.47. Given the level of development that is now anticipated to take place in and adjacent to Rugby Town during the plan period it is clear that Rugby town will remain the principal focus for growth in the Borough. None of the five spatial options outlined by the Council for the sustainability appraisal could therefore be discounted at this stage. Instead, as anticipated, the focus of option consideration comes down to the role each level of hierarchy within the rural area will play in strategic growth. This is considered in the next section of this paper.

## THE RURAL AREA

4.1. As stated above, the timing of the delivery of housing in and adjacent to Rugby Town will not be capable of providing a five year land supply nor sufficient to meet the housing target across the plan period. The emerging Local Plan will therefore need to allocate land in the rural area if the housing target is to be achieved, particularly in the first years, post adoption of the plan. The spatial options test a number of strategies for rural area allocation, considering different roles for the different tiers of the settlement hierarchy (as detailed in Figure 6) and broad locations present within the rural area. Each of these will be discussed in turn in this section.

## MAIN RURAL SETTLEMENTS

### Evidence

4.2. Work undertaken as part of the The Rural Sustainability Study<sup>12</sup> has informed conclusions about which villages in the Borough have sufficient services to be categorised as Main Rural Settlements.

4.3. Development in Main Rural Settlements (MRS) presents several advantages. Firstly, these development sites offer variation to the supply of sites already available to the strategic urban extensions to the town of Rugby. As highlighted within the Housing Delivery Study, it is important that there is variation in the portfolio of land available for residential development because: this increases the flexibility that is in supply; attracts smaller house building companies who will not be present upon larger strategic sites; ensures that there is variation in the timescales over which sites can be delivered; and provides the consumer (i.e. the future resident) with choice about where they live.

4.4. Not all MRS offer this variation in the portfolio of land available for residential development. Clifton upon Dunsmore and Dunchurch are located very close to Rugby and it is considered they share the same housing market as Rugby town. This is further reinforced by the levels of development that these MRS will experience through the life of the plan at the Rugby Radio Station Core Strategy allocation and the proposal contained within the Preferred Options to extend further out from Cawston. For these reasons, it is considered that development which would extend beyond the boundaries of Dunchurch and Clifton upon Dunsmore would not offer a variation to the location of sites, either committed or proposed, upon the edge of Rugby town. Although Long Lawford is relatively close to Rugby town it will not be in such close proximity to the level of growth allocated on the urban edge as Dunchurch and Clifton upon Dunsmore and an extension here will therefore contribute to the achievement of the housing target more effectively.

4.5. The expansion of MRS also has advantages in relation to the sustainability of these settlements. The development of new housing in the rural area will contribute to meeting the

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<sup>12</sup>[https://www.rugby.gov.uk/directory\\_record/5797/rural\\_sustainability\\_study\\_2015/category/86/reviews\\_studies\\_and\\_assessments](https://www.rugby.gov.uk/directory_record/5797/rural_sustainability_study_2015/category/86/reviews_studies_and_assessments)

housing needs of this section of the population, just as it would in the urban area. This is a clear advantage.

4.6. Alongside this, MRS will benefit from infrastructure investment that may come with new development and the existing local services and community facilities that exist in the locations will also benefit from an increase in the size of population that is reliant upon them.

4.7. Currently there is a small amount of committed housing schemes within the settlement boundaries of MRS. The trajectory in Appendix 1 indicates there will be delivery of approximately 220 dwellings within the plan period from sites within the MRS settlement boundaries.

4.8. The SHLAA has also demonstrated that, at present, none of the MRS has land capacity within their settlement boundaries. Boundary alteration would therefore be required if MRS were to make a strategic contribution to delivery. The SHLAA does indicate that there is capacity 5,746 dwellings on the edge of the MRS.

4.9. Land immediately adjacent to MRS presents two broad strategy options. For some villages there could be significant expansion, providing a large scale boundary alteration of housing. In others, smaller sites could be utilised to provide more limited expansion. As stated however, it is smaller sites that are likely to make the biggest contribution to housing delivery in this instance, particularly in the early part of the plan, and represent sustainable expansion of villages. This may mean for those large SHLAA submissions made that only land immediately adjacent to settlement boundaries could be brought forward, not least because of the impact on Green Belt. This detailed level of work will be undertaken to inform the Submission Local Plan and this additional evidence will establish the expected allocation for each of the Main Rural Settlements.

4.10. As each of these MRS are located within the Green Belt, this would require Green Belt release. The NPPF is clear that once established, Green Belt boundaries can only be altered in exceptional circumstances. The Council considers that there are insufficient deliverable sites in non Green Belt locations, that would promote sustainable patterns of development, to ensure a continuous five year supply of housing and meet the housing target within the plan period. The Council considers that this is an exceptional circumstance that can justify settlement extension and the resulting Green Belt release. However, the NPPF is also clear that Green Belt boundaries should only be in exceptional circumstances, through the preparation and review of a Local Plan. Therefore through this Local Plan preparation, detailed assessment of all available options at each MRS will have to be undertaken and impact upon the Green Belt clearly identified in order to ensure that the Green Belt release is fully justified by these circumstances. Further discussion about how this process will be undertaken is provided later in this section.

### **Implications for the assessment of spatial options**

4.11. The identification of a lack of land within Main Rural Settlement boundaries has implications for the spatial options the Council has considered as part of the development of the Preferred Option. Whilst development within these boundaries would be preferable, it will not be sufficient to meet strategic targets. On this basis, Option 1: Existing Balance and Option 4: Intensified Urban

Focus must be dismissed and only options that involve the alteration of boundaries to Main Rural Settlements can be considered realistic for this plan period.

### **Main Rural Settlements – Proposals**

4.12. Whilst MRS are sustainable locations for growth, careful consideration must be given to the quantity of growth that is allocated within the rural area in order to ensure it can be supported by the services and infrastructure that is available. At this stage the Council is of the view that sites allocated to Main Rural Settlements should be for approximately 100 dwellings, which in the context of the . As detailed below further work is needed to inform a Submission consultation Local Plan however this amount is considered appropriate because: this level of growth can be considered sustainable for these settlements; past experience in the Borough has shown sites of this size come forward quickly; and the housing trajectory shows collectively this contribution will make a significant difference to five year housing land supply post adoption.

4.13. From a housing delivery perspective therefore, the primary role of the Main Rural Settlements (MRS) in meeting the strategic housing target is to assist with five year land supply in the first part of the plan. To achieve this, sites need to be available now (at the point of the Local Plan adoption) and deliverable within the first five years, post adoption.

### **The Preferred Option**

#### **Main Rural Settlements**

The Main Rural Settlements listed below will each provide approximately 100 dwellings within the first five years of the plan period post adoption.

Binley Woods  
Brinklow  
Long Lawford  
Ryton on Dunsmore  
Stretton on Dunsmore  
Wolston  
Wolvey

#### **Reason for the Preferred Main Rural Settlement Option:**

4.14. As detailed, SHLAA work has shown that land is being promoted in all MRS and in most, sufficient land is promoted to accommodate this level of housing. Whilst this is the case, detailed work is needed to understand the constraints and opportunities each site has and therefore the extent of allocation.

4.15. The Housing Delivery Study is clear that short term housing delivery is most effectively bolstered if small sites, of a maximum of 50 dwellings, are brought forward (para 6.53). The total quantity of development proposed in each MRS clearly exceeds this number. However, the site

selection process will allow for consideration of a combination of smaller sites or the allocation of one larger site at each village to achieve this total.

4.16. If MRS have land that is available for this type of development but that cannot come forward in the first five years post adoption, sites can come forward to contribute to meeting the total housing target, providing flexibility in supply later on in the plan period.

4.17. The Council is keen to work in partnership with rural communities and Parish Councils to deliver the allocations proposed for Main Rural Settlements. Since adoption of the Core Strategy in Rugby Borough, the Government has introduced an important opportunity for local communities to plan for development in their neighbourhoods through the Neighbourhood Planning process.

4.18. The Council anticipates, as stated, that the allocation of land at Main Rural Settlements will require Green Belt release. This can only be achieved through the Local Plan making process at the Borough Council level; a Neighbourhood Plan cannot propose Green Belt release. However, once the land has been allocated, a Neighbourhood Plan can shape the development that is delivered upon a site, how the impacts of that are mitigated and how planning contributions are provided. The Council is going to encourage rural communities and Parish Councils in particular to consider the role of Neighbourhood Planning in this context.

4.19. As stated however, the primary purpose of Main Rural Settlement sites is to provide housing land in the short term in order to secure a five year land supply within the Borough. The work required to release land from the Green Belt and securing housing delivery on site must therefore commence immediately. This Council is ready to work collaboratively with rural communities who wish to proactively engage in this process, supporting them fully with the technical work involved which will initially involve the selection of sites to meet this need.

4.20. This work will include utilising the Coventry and Warwickshire Joint Green Belt Review Stage 1 to identify the sensitivity of the GB and the potential impact development may have. The Council will also work closely with service providers such as Education, health care and also highways and other important stakeholders to understand the associated infrastructure required and constraints that will inform allocations to MRS.

4.21. In any event, the submission version of the Local Plan will contain detailed, proposed site allocations that will be subject to further public consultation before being examined alongside all other policies in the plan.

4.22. The Council will seek further discussion with landowners and promoters during this consultation period in order to reach detailed conclusions about the timing of delivery. The call for sites exercise is also intended to ensure that all Main Rural Settlement opportunities have been identified.



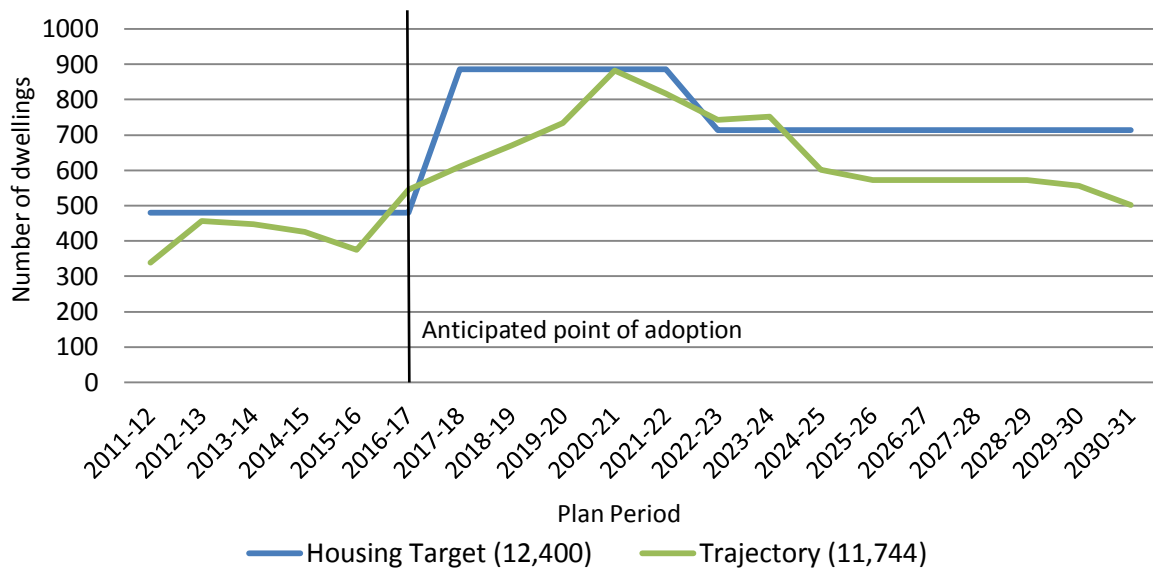
## MAIN RURAL SETTLEMENTS – CONCLUSION

4.23. The impact of these allocations to the housing trajectory can be seen at Appendix 1 and on the chart below. Inclusion of some village sites increases supply in first five years post adoption but does not secure a five year land supply in the short term, nor has sufficient land been placed in to supply to meet the housing target in full.

4.24. The Council has considered further allocations at Main Rural Settlements of either larger scale sites or of more, smaller sites. However, as has been explained above, there is an important balance to strike between the levels of development that could potentially be achieved and what can be considered sustainable in a rural location. The Council is of the view that the proposed housing distribution for Main Rural Settlements represents sustainable development and to increase provision in these locations would not be sustainable, particularly when there are other areas of the rural area that can be developed sustainably, such as the Coventry edge.

4.25. Further provision in the rural area is therefore required, alongside that proposed at the MRS.

**Figure 10: Housing Trajectory – commitments and proposed urban and MRS allocations**





## **RURAL SETTLEMENTS**

### **Local Needs Settlements (Rural Settlements) – Evidence**

4.26. Smaller settlements, known as Local Needs Settlements, have not had a role in the strategic delivery of housing in previous Local Plans. Instead, development in these villages is only permitted where it meets an identified local need for housing only. The availability of housing that meets the needs of rural communities has been a long standing concern of Rugby Borough Council. The policy regime currently applicable in these settlements was intended to ensure that where sites were available within smaller villages, development would meet the local need only. Housing Needs Surveys have been undertaken for these villages over a number of years and consistently demonstrated the need for smaller units and affordable housing within the rural area.

4.27. However, historically, very little housing that meets these specific needs has been provided. This has been for a variety of reasons, the most significant being the impact of building local needs housing on the overall viability of the development. Frequently this relates to the conversion of existing buildings where the development costs can be greater than that for new build. In addition applicants citing issues with conditions to be imposed on permissions which limit the future occupancy of the housing to to identified local need. This can result in lenders withdrawing funds. Such impacts result in developments not coming forward.

4.28. The Rural Sustainability Study has demonstrated that Local Needs Settlements do not contain the same levels of services available in MRS. This lack of infrastructure is likely to become a constraint to development unless sites of a scale sufficient to invest in infrastructure and services are allocated.

4.29. Only two site submissions to the SHLAA related to land located within the settlement boundary of a Local Needs Settlement and this had a capacity of 17 dwellings. If any level of strategic growth were to take place it would require boundary alteration to the villages and given the infrastructure restraints identified above, would have to be of a scale sufficient to provide infrastructure that would support a larger population.

4.30. This context has led the Council to consider whether any sites adjoining Local Needs Settlements would be of sufficient size to enable additional services, resulting in the settlement being upgraded to the same status as a Main Rural Settlement, as detailed in Option 5. In the first instance, the Council has considered villages located in the open countryside which is considered necessary prior to Green Belt alterations to accommodate new settlements.

4.31. The largest site(s) submitted to the SHLAA adjacent to a Local Needs Settlement boundary is located in Birdingbury, with a capacity of 139 dwellings. Birdingbury scores very poorly in terms of the level of services available, as detailed in the Rural Sustainability Study and this level of potential development is unlikely to viably be able to support the level of additional services required to either mitigate this extension or to upgrade the settlement to a MRS. No other Local Needs Settlement had such as significant submission to the SHLAA. It is therefore currently considered that no Local Needs Settlements located within the countryside could be upgraded to a MRS. Indeed, this analysis of SHLAA submissions also identified that whilst a number of large scale sites have been submitted in

the open countryside, none are of a sufficient size to accommodate the level of housing growth and infrastructure that could lead to development of a new MRS. Whilst this is a spatial option the Council considers reasonable, there is not the evidence to suggest this could be achieved within the open countryside of the Borough. This reinforces the need to look at boundary alterations of MRS within the Green Belt to accommodate the growth requirements, with these settlements being more sustainable.

4.32. The remaining larger suitable SHLAA sites, capable of supporting the delivery of local services, located within the Green Belt are considered as part of the Coventry edge scenario below.

### **Rural Settlements – The Preferred Option**

4.33. The Council is not proposing to allocate land within or adjacent to Local Needs Settlements. However, the Council acknowledges that, whilst intending to enable local needs development, the policy regime applicable to these settlements has proved to be too restrictive and not resulted in any development of this nature being achieved. Land that is available within Local Needs Settlements is therefore not being put into use and housing proposals that might be achievable are not coming forward. The council considers, in the wider context of the overall housing need of the Borough moving forward and the overall sustainability of rural populations in Local Needs Settlements, this policy approach must be changed.

4.34. As a result of these concerns, local need restrictions currently placed upon Local Needs Settlements will be removed; these settlements will therefore be referred to as **Rural Settlements** to reflect this change. The result will be that infill development, within settlement boundaries, will be acceptable in principle without evidence of local need being required. This scale of development will be sustainable because it will be small scale, given the limitations of the settlement boundaries and will allow for some new development in these villages. This infill development will also occur alongside extension to the Main Rural Settlements, the scale of which will result in the introduction of affordable housing that can benefit the entire rural community.

4.35. As previously stated, the Rural Sustainability Study has also demonstrated that these villages do not contain the same levels of services available in MRS. In recognition of the fact that the benefits of growth can apply to these smaller settlements, the Council will make the same offer of support to Rural Settlement communities or Parish Councils that is to those in the Main Rural Settlements. If these communities would like to see a sustainable extension to the settlement boundary of their village, the Council will support them in pro-actively engaging in the plan making process to investigate delivery. Such an extension could be a small development to provide a handful of houses. There may also be opportunities to secure a level of development that could introduce new infrastructure and services to a village, resulting in its role becoming more akin to that of a Main Rural Settlement. Potential for either of these types of development will be confirmed in advance of Submission of this emerging Local Plan.

### **Rural Settlements: Implications for the assessment of spatial options**

4.36. The spatial options set out two broad options for LNS: development limited to that which meets an identified local need; or small scale infill is permissible. It begins to become apparent,

when considering the evidence outlined so far for the rural area, that the spatial options begin to overlap and whilst the elements of some should be discounted, other parts of the same option could be put into practice. For example, Option 3: Wider Focus allows for boundary alteration at the MRS, which is proposed, but only allows for Local Needs development in smaller settlements. This option in this form has to be dismissed. Option 5: New Village remains a potential option because it may remain possible within the Green Belt, despite not being possible within the open countryside.

## COVENTRY AND HINCKLEY URBAN EDGE

### Evidence

4.37. As detailed earlier in this section, proposed allocations have provided sufficient housing to reduce the shortfall against the housing target to approximately 656 dwellings.

4.38. The Housing Deliverability Report highlights that Coventry urban edge presents an opportunity to provide further development in a sustainable location, tapping into a housing market separate to that at Rugby town and therefore increasing the quantity of housing that is delivered across the Borough as a whole. This possibility is included within the spatial options and must therefore be considered before conclusions can be drawn as to whether or not the strategic housing target can be met.

4.39. The SHLAA indicates that there is capacity for 5,695 dwellings on the urban edge of Coventry. There were no sites submitted to the SHLAA adjoining the urban edge of Hinckley.

4.40. On the Coventry edge, three of the sites that comprise this theoretical capacity are promoted as single, large scale, potentially mixed use developments. There is also a number of sites adjacent to the A45 and Tollbar Island that are not promoted as a collection but by individual land owners; this could also present an opportunity for large scale strategic development albeit requiring a realistic assumption about lead in times. The sites located adjacent to the A45 and the Tollbar have differing constraints, including access and flooding, and proximity to SSSIs which makes them more challenging options to consider. All sites present infrastructure challenges however and the solution to these challenges is more readily available in some locations more than other. In particular the site to the north of Binley Woods would require more considered mitigation for access, which at this stage is unknown.

4.41. Some of the options considered overlap with MRS options already referred to. For example, sites adjacent to Ryton and Binley Woods present opportunities to expand those villages. However, given the proximity of these villages to the Coventry boundary, these sites could present an opportunity to deliver growth in this location.

4.42. These options could also present the opportunity to provide a new MRS, albeit with close proximity to the Coventry urban edge. The Walsgrave on Sowe site is a sufficient scale to accommodate a new settlement as is land promoted adjacent to Ansty; a Rural Settlement in the Green Belt that could be extended and upgraded if this site were to be brought forward.

4.43. Inevitably, however, as with MRS, development upon the Coventry urban edge would have to be predicated by Green Belt release within this Local Plan. As stated, the Council considers that the promotion of sustainable patterns of development that meet identified housing need is an exceptional circumstance that can justify Green Belt release. In this specific location, the advantages of locating development that would meet the unmet housing needs of the Coventry and Warwickshire housing market area, Coventry City most specifically, are a further sufficiently exceptional circumstance to justify Green Belt release within Rugby Borough. Any development in

this location will require careful master planning and design in order to ensure that impact upon the Green Belt is minimised as much as possible.

4.44. The Walsgrave on Sowe site is considered to be the most suitable of the edge of Coventry options. The site is surrounded by the existing uses of Ansty Park and Rolls Royce and Coombe Abbey to the south. These uses provide a natural boundary to the site and will prevent the sprawl of development into the wider Green Belt. The Coventry and Warwickshire Joint Green Belt Review Stage 1 says of this parcel that Coombe pool directly to the south helps to prevent encroachment of the wider countryside to the south. Further, there is a small brook, which runs through the northern half of the parcel, providing limited protection to the north east. Of all the Green Belt options, this option has the most self containment.

4.45. Furthermore, GL Hearn have outlined the considerations that must be given to large scale strategic development, such as that required in this location to ensure the achievement of the housing target. This typology will require a lead in time, of at least three to five years, before development can be commenced. This fact, coupled with the likelihood of significant infrastructure investment, means that these site options are unlikely to make a contribution in the first five years post adoption.

#### **Coventry Urban Edge: the Preferred Option**

4.46. The delivery of a new Main Rural Settlement is also considered to be the most sustainable form of development in this location. The site selected is considered on balance, at this stage, to represent the best option overall on location, deliverability, infrastructure and impact on the Green Belt. Furthermore, the potential capacity of the site is considered sufficient in supplementing other allocations as proposed through this Preferred Options paper.

#### **Coventry urban edge: Walsgrave on Sowe**

This site will be allocated to provide mixed use development, including a new settlement of approximately 1500 houses. 750 dwellings are anticipated to be delivered within the plan period.

#### **Reason for the Preferred Option**

4.47. This allocation will result in a new Main Rural Settlement in Rugby Borough. The allocation of a new settlement will ensure that housing is delivered in a sustainable manner, offering new residents access to all required local services. The new settlement will also be designed to ensure good connections to City are provided in order to secure access to the extensive supply of services and facilities present there. Green Belt release will be necessary and further evidence that ensures impact on the Green Belt is minimised will be developed as this site is masterplanned.

4.48. Delivery of this site is reliant upon the introduction of a new junction to the A46. Discussions with Warwickshire County Council Highways and Highways England (in conjunction with Coventry City Council) have confirmed this work is in the pipeline. These improvements are currently planned within the Road Investment Strategy for the 2015/16 – 2019/20 time period. This new junction will

allow for access to land within Rugby Borough, adjacent to the A46. The planning and design of this new junction can be informed by the masterplanning of this new settlement, ensuring that impact upon the local highway network is minimal. This is the only Coventry urban edge option available that will benefit directly from this strategic highway improvement in this way.

4.49. Given the strategic nature of the site and the necessary Green Belt release to secure delivery, a lead in time of up to five years is anticipated as the site progresses through the planning system. For both of these reasons, delivery upon this site is anticipated to commence in 2022. On that basis, 750 houses are anticipated to come forward in the plan period.

4.50. The Council will expect the design of this new settlement to be of the highest quality, ensuring it is in keeping with its rural location maximising the opportunities this offers. The site is promoted for large scale employment provision to the north; detail of this is included within the Employment Lands Background Paper. Sensitive treatment of the boundary between this employment area and the new settlement will be necessary. Coombe Abbey is adjacent to the site to the south and presents an important opportunity. This asset requires sensitive and careful design of boundary between the two but could improve pedestrian links and result in investment to the natural environment in this location.

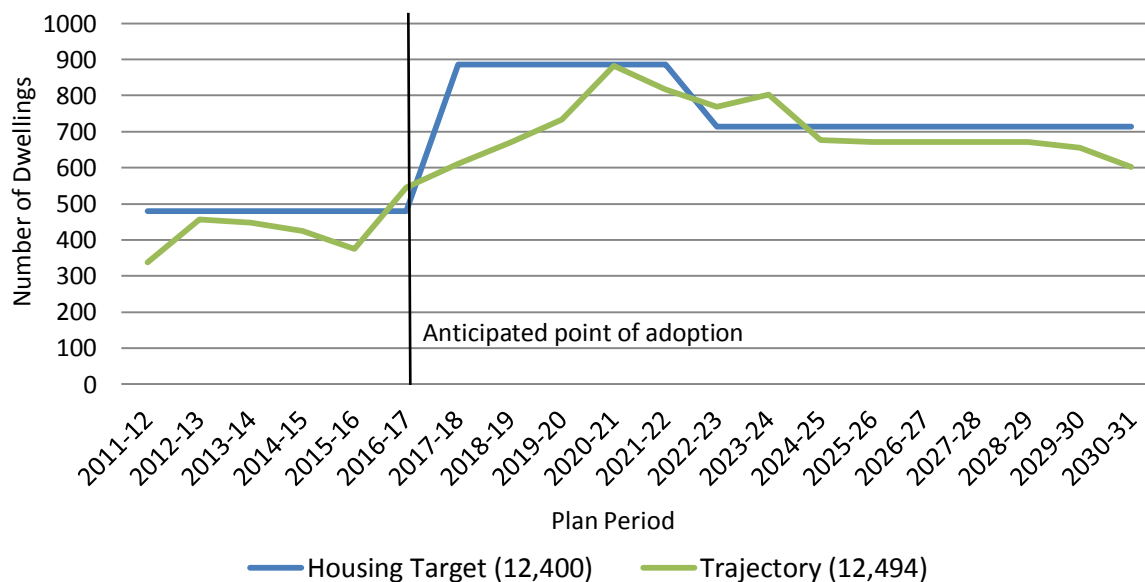
4.51. Given the location and the necessary infrastructure required to deliver this new settlement, the Council will work with important partners including HE and WCC Highways with regard the enabling and transport mitigation and Historic England regarding the sympathetic treatment required of the adjacent heritage assets. This work will be developed to inform the Submission consultation.

#### **COVENTRY EDGE – CONCLUSION**

4.52. The inclusion of this strategic site, later on in the plan period, is instrumental to the achievement of the housing target. The impact upon the housing trajectory can be seen in the graph below and it becomes apparent that this site allows for the achievement of the strategic housing target. However, the lead in time to delivery does not allow this site to assist with the delivery of a five year supply post adoption and this remains an issue with the trajectory that this collection of proposed allocations creates.

4.53. The implications this has for the phasing of the housing target is considered in the next section of this paper.

**Figure 11: Housing Trajectory – commitments and all proposed allocations.**

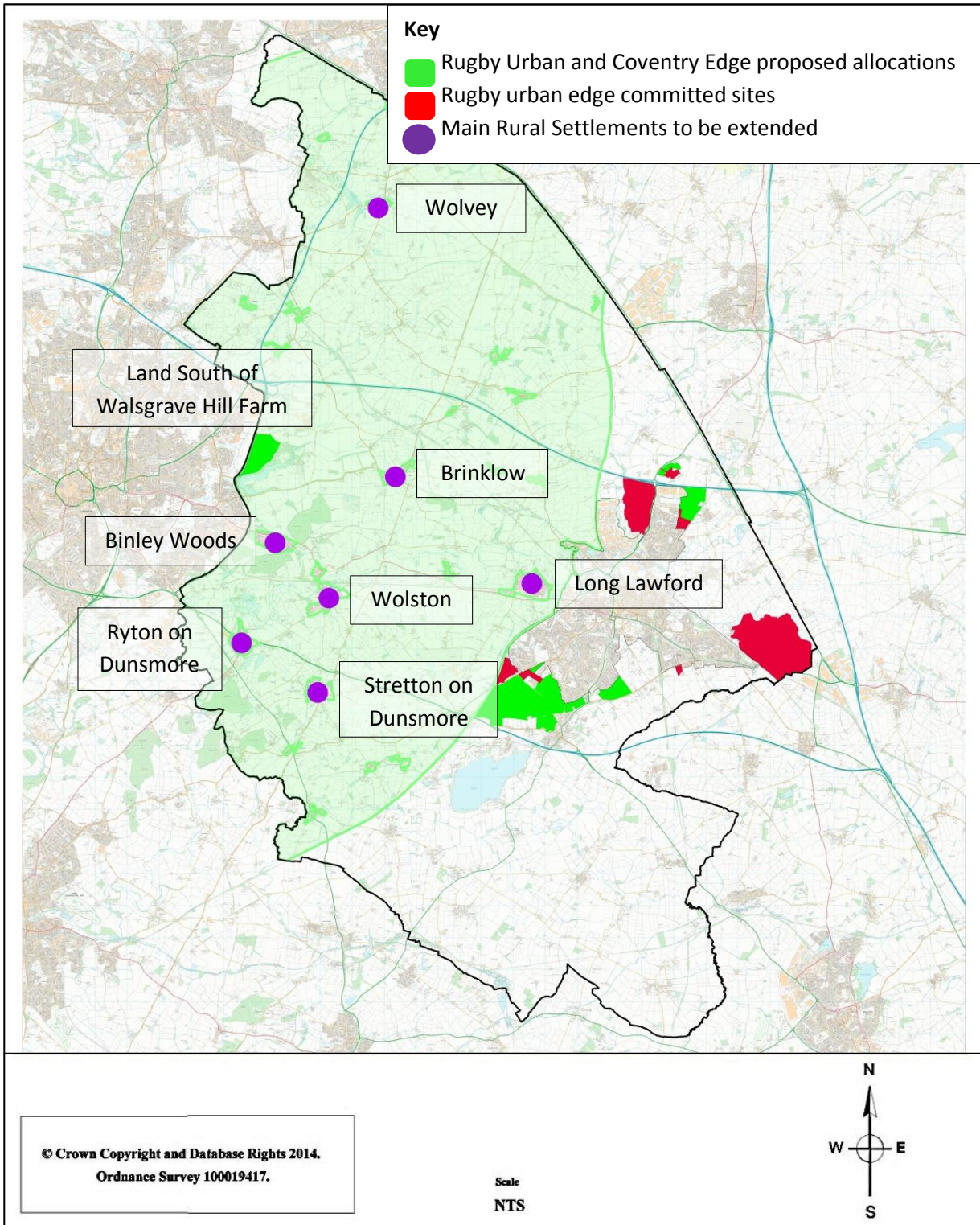


**Implications for the assessment of spatial options**

4.54. As outlined above, when this evidence is considered against the spatial options it becomes apparent that it is not possible to choose one of the options, as defined. Instead, an amalgamation of options two (urban and urban edge focus) and option five (new village) is arrived.

4.55. The SA concludes that in the majority of instances mostly positive or neutral impacts are identified against the SA Framework, potential negative landscape impacts where identified. Work will be undertaken to inform the Submission Local Plan to understand landscape impacts and to inform appropriate mitigation at the local plan level.

4.56. The resulting preferred distribution strategy is outlined within the conclusions of this paper. A summary of the assessment of spatial options is included at appendix 3.





## 5. PHASING OF THE HOUSING TARGET

5.1. As demonstrated in figure 11 above and appendix 2, whilst the gross housing target is exceeded during the plan period, it is clear that the Council would be unable to demonstrate a continuous 5 year supply of housing (when calculated as set out in figure 5) because of a deficit in all but one of the first 5 years post adoption. Within this first 5 year period, post adoption, it is anticipated that 3,713 dwellings will be delivered against the requirement in that period of 4,430.

5.2. The five year land supply issue the Council currently faces therefore still persists, despite the fact that the proposed distribution strategy will maximise the urban area by incorporating all sites considered deliverable within the plan period. The Council is also proposing a set of allocations that ensure the sites that come forward vary in size and location, across the urban and rural area, diversifying the portfolio of available land in order to maximise market delivery rates as much as possible.

5.3. The trajectory that results from the proposed allocations can be considered to be optimistically front loaded. A significant supply of sites is proposed within the urban area which, as detailed, is considered to be the same market area with the only point of difference between sites being the product offered by the housebuilders. It should also be noted that the Housing Delivery Study highlights that the growth rates in housing delivery required to achieve 600+ dwellings per annum could be achieved in the future if economic and housing market conditions were right. However, this is not a growth rate that will be achieved immediately. Achievement of this growth rate therefore depends upon the pace of recovery in housing delivery post-recession and whether the Borough can continue to sustain delivery rates within the upper quartile of local authorities nationally.

5.4. It is not possible to secure the supply of land any earlier than anticipated in the proposed trajectory at appendix 2. The release of Green Belt sites adjacent to Main Rural Settlements is instrumental to addressing the five year land supply issue at adoption and it would not be possible to bring these sites forward any earlier because Green Belt release can only be achieved through the plan making process. The new village proposed south of Walsgrave Hill Farm, which offers a different housing market area to Rugby urban area, can also not be brought forward any sooner as its delivery is reliant on transport infrastructure works which will not commence within the first five years of the plan post adoption.

5.5. However, for the Local Plan to be found sound, the Council must be able to demonstrate a five year supply at the point of adoption. Given that this is not achieved, the Council considers it is appropriate to phase its housing target to better reflect an achievable housing trajectory.

5.6. The Council is therefore proposing that the target of 480 dwellings will date from 2011 until 2022. In making this proposal, the Council is able to place sufficient land into supply to resolve any shortfall that exists at the point of adoption and achieve the required five year supply. This approach will also ensure that the release of further sites, which would inevitably be within the Green Belt and result in unsustainable development and impact on the Green Belt, will be avoided.

5.7. At the point of adoption therefore the five year housing target would be 646 dwellings per annum which is inclusive of the shortfall against 480 dwellings per adoption and a 20% buffer, as shown in the table below. Whilst this is a lower target, the achievement of such a level of delivery in the short term post adoption is still a significant challenge as highlighted within the Housing Delivery Study.

**Figure 12: Calculation of five year land supply at the point of adoption**

A	Annual requirement at point of adoption	480
B	Five Year Housing Target at point of adoption (2011-16/17)	2880
C	Anticipated Completions (2011-2016/17)	2588
D	Undersupply (B-C)	-292
E	5 year requirement 2017/18-2022/23 (A*5 +D +20%)	3230
F	Annualised requirement 2017/18-2021/22 (E/5)	646

5.8. The Council is committed to playing its role in achieving the housing needs of the HMA and to ensure the needs of the Coventry and Warwickshire HMA are met in full. The housing target will therefore increase from 480 dwellings per annum in 2022 in order to ensure the redistributed need from Coventry is met. The 2,800 dwellings that are to be redistributed to Rugby Borough would be delivered within the remaining 9 years of the plan period at a rate of 311 dwellings per annum. This approach will also coincide with the market improvements envisaged within the Housing Delivery Study.

5.9. The resulting housing target is set out in the table below:

**Figure 13: Phased Housing Target**

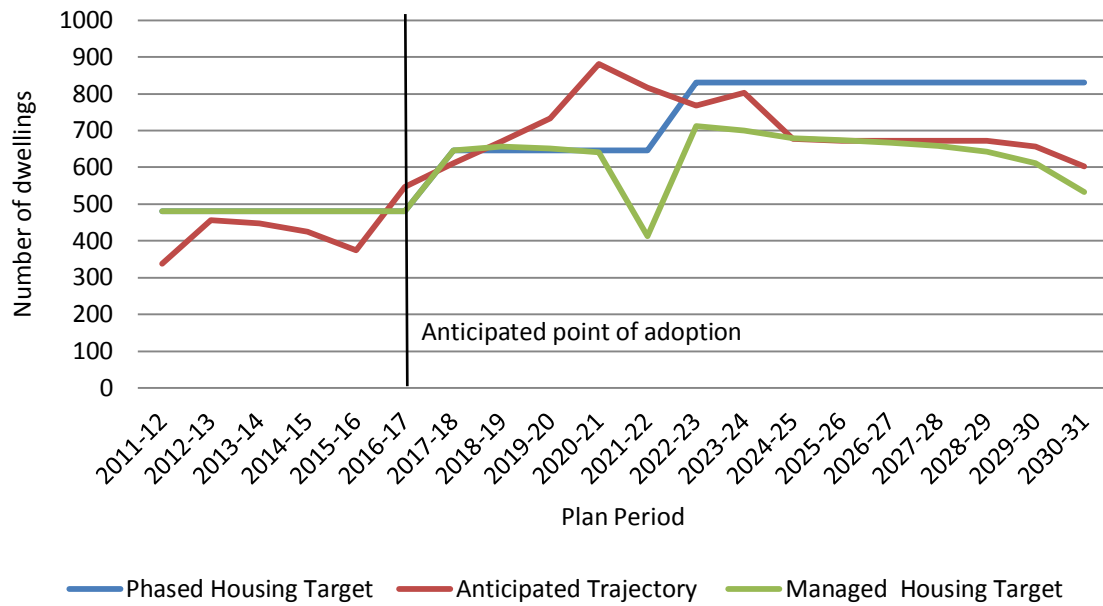
Timeframe	Annualised target	Gross delivery within timeframe
2011-2022	480	5280
2022 - 2031	791	7119
<b>TOTAL DELIVERY</b>		<b>12,400<sup>13</sup></b>

5.10. Figure 14 below displays the effects of the anticipated housing trajectory on the achievement of this phased housing target. The 20% buffer applied in the first years post adoption means that, in effect, the Council will be front loading the housing trajectory despite a lower target within the first five years of the plan post adoption. This will secure the delivery of housing to meet both the needs of the Borough and HMA.

5.11. The lower initial annual target should therefore not be seen as restricting the delivery of housing in the Borough. Instead, it reflects a more realistic pattern of delivery.

<sup>13</sup> Figure rounded

**Figure 14:** Phase housing target and anticipated trajectory target across the plan period.



## 6. CONCLUSION

6.1. The Council is proposing to set a gross housing target of 12,400 dwellings between 2011 and 2031. This paper has outlined the considerations that must be had before choosing that gross target. This gross target is to be achieved by a phased trajectory, as outlined in the table below:

Timeframe	Annualised target	Gross delivery within timeframe
2011-2022	480	5280
2022 - 2031	791	7119
<b>TOTAL DELIVERY</b>		<b>12,400<sup>14</sup></b>

6.2. The Preferred Distribution Option that has been informed by this evidence sets out a distribution strategy that seeks to achieve the housing target in a phased way, as set out in the table above. The analysis of the opportunity and constraint of the Rugby Urban Area is clear that other tiers of the settlement hierarchy must bring forward growth within the Local Plan period. The resulting Preferred Distribution Option, as detailed below, seeks to realise the opportunities each level of the hierarchy can offer both in terms of sustainability and providing the emerging Local Plan with the most deliverable strategy to meeting the housing target.

**Figure 15: The Preferred Distribution Strategy:**

Location	Distribution
<b>Rugby Urban Edge</b>	Main focus for growth through urban extensions & infill
<b>Main Rural Settlements</b>	Boundary alteration to accommodate some housing growth
<b>Coventry Edge</b>	Development adjacent to the City boundary (within Rugby borough) to meet unmet need arising from Coventry.
<b>Rural Settlements</b>	Boundary alteration, if supported by the Neighbourhood Planning Process.
<b>Countryside</b>	All new development will be restricted to preserve the existing character and resources.

6.3. The Council is confident that the distribution strategy proposed represents the most sustainable of the policy options available to it when considering how the housing target can be met. It is a strategy that puts more than enough land into supply when the gross quantities of housing that could be delivered are considered and it will allow for the housing target to be met.

6.4. However, at this stage in the plan making process evidence indicates a flat, annualised housing trajectory will not be achieved post adoption nor would a five year supply.

6.5. The Preferred Options therefore proposes a phased target to ensure that the Council can demonstrate a five year supply at the point of adoption. The phased target approach will ensure that development will take place in the most sustainable locations.

<sup>14</sup> Figure rounded

6.6. The role of the rural area that is proposed in this Preferred Option is predicated on the assumptions made about the urban area and the rate at which housing can be delivered in this location. The Council has sought to make conservative estimations on this point in order to ensure that sufficient land is allocated to achieve its targets.

6.7. As an example, the evidence base that supports this Preferred Option clearly states that the owners of the Rugby Radio Station site consider that they are capable of achieving a faster rate of deliver on this site than is currently set out with the housing trajectory appended to this Paper. The consultation process will allow the Council to reconsider this point, should further evidence be put forward. If it can be demonstrated that this site, or indeed any other located on the urban edge, can deliver at rates that exceed those assumed, this will be shown in the Submission Version of the plan and the implications of the rural area reflected appropriately. The Council has consciously adopted a conservative approach at this stage, in order to ensure it is proposing sufficient allocation to secure a five year land supply and a plan led approach to housing delivery in the Borough.

6.8. Achievement of the housing target is also predicated upon delivery in the rural area both in terms of the level of Main Rural Settlement extension that can be secured and rate of delivery on the edge of Coventry City. As a result, the Council is running a call for sites exercise throughout the consultation period for this Preferred Option in order to ensure that all available site options have been considered, particularly outside of the Green Belt. Further site submissions will be considered as the Submission Version plan is developed.

6.9. The Preferred Option consultation is intended to test the Council's assumptions on these points. Comments made will be considered and will inform the Publication Version of the Local Plan which will outline the Council's conclusions upon its capacity for housing development and appropriate distribution strategy.

## **APPENDICES**

APPENDIX 1: Current Housing Trajectory

APPENDIX 2: The Preferred Option Housing Trajectory

APPENDIX 3: Assessment of Spatial Options

**APPENDIX 1: The current housing trajectory**

	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	TOTAL
	Pre-adoption					1st Five Years of adopted plan															
<b>Development Commenced</b>																					<b>TOTAL</b>
Land at Leicester Road					49	47	40														136
Land at Leicester Road					2																2
Technology Drive Zone C Phase 2					28																28
Technology Drive Zone C Phase 3					35	40															75
Ambulance Station, Brownsover Lane					2																2
Coton Park East					42																42
Gateway R1					17																17
Lime Tree Village - C2 units					15	19	10	3													47
Priory Road, Wolston					50	9															59
Cawston Grange					28	33	22														83
Former Warwickshire College Site					15	40	40	36													131
Coton House						15	40	19													74
Upper Floors, 9 North Street, Rugby						35															35
Former New Bilton Conservative Club						10															10
Land rear of 263- 273B Hillmorton Road					5																5
Spiritual Centre, 5 Newbold Road.					6																6
Former Works Site, Willow Lane, Rugby					3																3
Avenue Road					8																8
1 Park Road					6																6
Church Lawford Garden Centre					9																9
Ivy Grange					7																7
Land rear of 69a to 89 Hillmorton Road						12															12
Webb Ellis Business Park						67															67
95 Clifton Road CV21 3QQ					6																6
<b>Development approved but not yet commenced</b>																					
Gateway						30	70	70	70	70	70	70	70	70	70	70	70	70	54		924
Gateway R4						27	40	40	25												132
Bilton Grange						25	25														50
Rugby Radio Station						20	50	115	190	190	190	190	190	190	190	190	190	190	190	190	2465
Former Ballast Pits							16	30	30												76
Cawston Lane								20	40	40	40	40	40	30							250
Grange Cottage Farm Coventry Road						10															10
Ridgeway Farm							30	40	26												96
Coton Park East Phase B1 & B2						30	50	50	20												150
<b>Subject to signed section 106</b>																					
Dipbar fields							26	30	30												86
Back Lane South						15	40	40	17												112
Land at Leicester Road						20	40	40	40	40	40	11									231
<b>Live Planning Application</b>																					
Cawston Extension							30	40	43												113
<b>Windfalls</b>					42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	672
<b>CURRENT HOUSING TRAJECTORY</b>	<b>338</b>	<b>456</b>	<b>448</b>	<b>425</b>	<b>375</b>	<b>546</b>	<b>611</b>	<b>615</b>	<b>573</b>	<b>382</b>	<b>382</b>	<b>353</b>	<b>342</b>	<b>332</b>	<b>302</b>	<b>302</b>	<b>302</b>	<b>302</b>	<b>286</b>	<b>232</b>	

**APPENDIX 2: The Preferred Option Housing Trajectory**

	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	
	Pre-adoption						1st Five Years of adopted plan														
<b>Past Completions at time of adoption(Net)</b>	338	456	448	425																	
<b>Anticipated Completions pre adoption</b>					375	546															
<b>Shortfall against 480 at adoption</b>	-142	-24	-32	-55	-105	66															
<b>Total Shortfall</b>	-292																				
<b>Annualised Requirement</b>	480	480	480	480	480	480	480	480	480	480	480	791	791	791	791	791	791	791	791	791	791
<b>Phased Delivery Target (inclusive of undersupply and 20% buffer)</b>							646	656	652	640	413										
<b>Phased Delivery Target (inclusive of 5% buffer)</b>												712	700	679	674	668	658	643	611	533	
<b>CURRENT HOUSING TRAJECTORY</b>	<b>338</b>	<b>456</b>	<b>448</b>	<b>425</b>	<b>375</b>	<b>546</b>	<b>611</b>	<b>615</b>	<b>573</b>	<b>382</b>	<b>382</b>	<b>353</b>	<b>342</b>	<b>332</b>	<b>302</b>	<b>302</b>	<b>302</b>	<b>302</b>	<b>286</b>	<b>232</b>	<b>7904</b>
<b>Preferred Options Allocations</b>																					
Coton Park East Expansion										30	50	50	50	50	50	50	50	50	50	50	530
Coton House small expansion								25	50	50	25										150
Coventry Road, Bilton (WCC based on Design and Access Sept 2015)								30	60	60											150
Land South of Alwyn Road									30	80	80	80	80	80	80	80	80	80	80	80	910
Bilton Fields, Ashlawn Road												30	50	60	60	60	60	60	60	60	500
Cawston Spinney									20	80	80	80	80	80	80	80	80	80	80	80	900
<b>Proposed Settlements to accommodate growth</b>																					
Wolvey										50	50										100
Stretton on Dunsmore										50	50										100
Ryton on Dunsmore												50	50								100
Brinklow										50	50										100
Binley Woods												50	50								100
Wolston												50	50								100
Long Lawford										50	50										100
<b>New Settlement</b>																					
Land South of Walsgrave Hill Farm												25	50	75	100	100	100	100	100	100	750
<b>TOTAL TRAJECTORY</b>	<b>338</b>	<b>456</b>	<b>448</b>	<b>425</b>	<b>375</b>	<b>546</b>	<b>611</b>	<b>670</b>	<b>733</b>	<b>882</b>	<b>817</b>	<b>768</b>	<b>802</b>	<b>677</b>	<b>672</b>	<b>672</b>	<b>672</b>	<b>672</b>	<b>656</b>	<b>602</b>	<b>12494</b>



### APPENDIX 3: SUMMARY OF THE ASSESSMENT OF SPATIAL OPTIONS

	Description	Pro	Con
<b>Option 1: Existing balance</b>	<ul style="list-style-type: none"> <li>• Main focus is Rugby Town via infill development or urban extension;</li> <li>• MRS development occurs within existing settlement boundaries;</li> <li>• RS are limited to development that meets an identified need only.</li> </ul>	<ul style="list-style-type: none"> <li>• Prevents Green Belt release;</li> <li>• Development is focused within or adjacent to the most sustainable location in the Borough – Rugby Town;</li> </ul>	<ul style="list-style-type: none"> <li>• Existing Balance is currently adopted and insufficient housing is being delivered;</li> <li>• This approach will not produce a deliverable plan because a five year land supply cannot be demonstrated;</li> <li>• Further large scale, urban extension is likely to be constrained by infrastructure provision and market delivery;</li> <li>• Main Rural Settlements are constrained by their current boundaries and there is little potential for infill development</li> </ul>
<b>Option 2: Urban and Urban edge focus</b>	<ul style="list-style-type: none"> <li>• Main focus is Rugby Town via infill development or urban extension;</li> <li>• Where Rugby Town cannot accommodate all growth, additional development is focussed upon the edge of Coventry and Hinckley urban area;</li> <li>• Some boundary alterations are made to MRS;</li> <li>• RS are limited to development that meets an identified need only.</li> </ul>	<ul style="list-style-type: none"> <li>• Development is focused within or adjacent to the most sustainable location in the Borough – Rugby Town;</li> <li>• Varies the portfolio of sites to the greatest potential of all options because of development at the urban edges of adjacent settlements and extension to MRS;</li> <li>• Smaller sites can be allocated at the MRS which will be quicker to deliver and assist with five year supply;</li> <li>• Helps to support rural communities and facilities;</li> <li>• Development in the rural area will help to support local communities and facilities.</li> </ul>	<ul style="list-style-type: none"> <li>• Boundary alteration of MRS and development on edge of adjacent urban settlements will require Green Belt release;</li> <li>• Capacity for MRS expansion could be constrained by capacity of infrastructure and availability of local services;</li> <li>• Promoted sites on the Coventry edge are large and will require lead in time before delivery can commence;</li> <li>• The sustainability of a dispersed approach to growth could become a risk.</li> </ul>
<b>Option 3: Wider Focus</b>	<ul style="list-style-type: none"> <li>• Main focus is Rugby Town via infill development or urban extension;</li> <li>• Some boundary alterations are made to MRS;</li> <li>• RS are limited to development that</li> </ul>	<ul style="list-style-type: none"> <li>• Development is focused within or adjacent to the most sustainable location in the Borough – Rugby Town;</li> <li>• Development in the rural area will help to support local communities and facilities</li> </ul>	<ul style="list-style-type: none"> <li>• Likely scale of expansion required to MRS to accommodate growth is significant. There are limited options to achieve this and it is likely to be unsustainable and constrained by</li> </ul>

	meets an identified need only.	<ul style="list-style-type: none"> <li>• Smaller sites can be allocated at the MRS which will be quicker to deliver and assist with five year supply;</li> <li>• Will vary the portfolio of sites available, assisting delivery rates.</li> </ul>	<p>capacity of infrastructure and availability of local services;</p> <ul style="list-style-type: none"> <li>• There is very little capacity within LNS settlement boundaries;</li> <li>• The sustainability of a dispersed approach to growth could become a risk if it is not possible to provide sufficient services and infrastructure to support development;</li> <li>• Further large scale urban extension is likely to be constrained by infrastructure provision and market delivery.</li> </ul>
<b>Option 4: Intensified Urban Focus</b>	<ul style="list-style-type: none"> <li>• Main focus is Rugby Town via infill development or urban extension;</li> <li>• MRS are limited to development that meets an identified need only;</li> <li>• LNS development is restricted.</li> </ul>	<ul style="list-style-type: none"> <li>• Prevents Green Belt release;</li> <li>• Development is focused within or adjacent to the most sustainable location in the Borough – Rugby Town.</li> </ul>	<ul style="list-style-type: none"> <li>• This approach will not produce a deliverable plan because it is unlikely to place sufficient land into supply to meet the housing target and a five year land supply cannot be demonstrated;</li> <li>• Market delivery will not be increased because this option does not offer a variation in the portfolio of available sites;</li> <li>• Restricting development in the rural area does not support rural communities or services;</li> <li>• Highway capacity constrains the urban edge.</li> </ul>
<b>Option 5: New Town</b>	<ul style="list-style-type: none"> <li>• Main focus is Rugby Town via infill development or urban extension;</li> <li>• Where Rugby Town cannot accommodate all growth, additional development is focussed a new MRS development occurs within existing settlement boundaries;</li> <li>• LNS accommodate small scale infill development.</li> </ul>	<ul style="list-style-type: none"> <li>• New MRS will be designed to accommodate all required services and infrastructure so would be a sustainable development;</li> <li>• GB release could be prevented if delivered in the countryside;</li> <li>• Infill at LNS will vary portfolio of available land and support existing communities and facilities;</li> </ul>	<ul style="list-style-type: none"> <li>• A new MRS is unlikely to resolve five year land supply because of its scale and infrastructure requirement;</li> <li>• A large scale new settlement will not vary the portfolio of available land within the Borough as much as other options;</li> <li>• Site options are not available outside the Green Belt so release of GB land would be required;</li> </ul>

## Conclusion of the Assessment of Spatial Options

In addition to the assessment referred to in this document, the SA assessed each of the options against the SA Framework to identify potential impacts against each SA Objective. As detailed previously, Rugby urban area, as the primary focus for growth in the Borough, is present in all of the spatial options for growth. The variation in option is therefore about the role that the rural area should take in meeting strategic housing targets. As such many of the potential impacts identified through the SA are common to all of the options considered. These can be viewed in the SA Report which accompanies the Preferred Options Local Plan.

Overall, the SA flagged up the potential for landscape impacts from all additional growth in rural locations as part of all options considered, however, this was to a lesser extent in the case of Option 1: Existing Balance and Option 4: Intensified Urban Focus. All of the options could benefit the vitality and viability of the town centre, support urban regeneration and facilitate the use of brownfield sites for new development. Good opportunities to use sustainable transport and reduce journey lengths are also likely to exist under all options, because of the focus on Rugby town. The main points to emerge from this are noted below. Each of the options is considered in turn below.

Option 1: Existing balance	Main focus is Rugby Town via infill development or urban extension; MRS development occurs within existing settlement boundaries; LNS are limited to development that meets an identified need only.
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Option 1 has been dismissed as the Preferred Option primarily because it is the current approach contained within the Core Strategy CS1: Development Strategy. As detailed in this Paper, insufficient housing is being delivered under this strategy and policy intervention is required to ensure housing targets are met. This renders this option inadequate for the Local Plan.

Option 2: Urban and Urban edge focus	Main focus is Rugby Town via infill development or urban extension; Where Rugby Town cannot accommodate all growth, additional development is focussed upon the edge of Coventry and Hinckley urban area; Some boundary alterations are made to MRS; LNS are limited to development that meets an identified need only.
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Options 2 does offer the potential for a greater portfolio of sites to come forward across the Borough, increasing the overall deliverability of housing. The delivery of housing on the edge of Coventry allows sustainable development that accesses a separate housing market. This, alongside, extensions to Main Rural Settlements, allows for the achievement of the strategic growth targets within the plan period. Whilst not relied on for strategic growth, the element of Option 2 in relation to Local Needs Settlements has been identified through this background paper as being ineffective in meeting the locally identified need. Although it is considered that this aspect of Option 2 cannot be taken forward, overall this background paper has demonstrated the variety of the location of sites this option offers the most deliverable approach to the strategic growth targets in the borough.

Option 3: Wider Focus	Main focus is Rugby Town via infill development or urban extension; Some boundary alterations are made to MRS; LNS are limited to development that meets an identified need only.
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Option 3 has been dismissed as the Preferred Option primarily because amendments to Main Rural Settlements alone are not sufficient to supplement the growth proposed at the Rugby Urban Area in meeting the strategic growth targets. As this option would involve more widespread development in rural areas as well urban edge growth, the SA identified fewer benefits and some negative impacts in relation to reduced access to services and facilities, longer journeys and higher levels of car use.

<p>Option 4: Intensified Urban Focus</p>	<p>Main focus is Rugby Town via infill development or urban extension; MRS are limited to development that meets an identified need only; LNS development is restricted</p>
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As detailed within the SHLAA there is very limited capacity within the existing settlement boundaries of both Main Rural Settlements and Local Needs Settlements to make a meaningful contribution to meeting the growth needs alongside the Rugby Urban Edge. Unsurprisingly this option performs the best against the SA Framework in general, however, out of all the options it scores the worst against SA Objective 4: Provide affordable and decent housing, which meets the needs of the Borough. This background paper has clearly demonstrated despite the SA results for this Option it cannot be taken forward as the Preferred Option because it will not deliver the strategic growth targets.

<p>Option 5: New Town</p>	<p>Main focus is Rugby Town via infill development or urban extension; Where Rugby Town cannot accommodate all growth, additional development is focussed in a new MRS development; MRS development occurs within existing settlement boundaries; LNS accommodate small scale infill development.</p>
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The advantages of the delivery of a new village within the rural area have been recognised and this is proposed, in line with the strategy set out at option 2. It is acknowledged that the SA identified a significant potential negative landscape impact if a new town were to be delivered although this is again uncertain depending on its location and design. The SA identified the potential for fewer benefits and some negative impacts in relation to reduced access to services and facilities, longer journeys and higher levels of car use. Clearly this would depend upon the location of a new town and infrastructure provided and would be addressed as a new town in designed and developed.

As detailed in this background paper, elements of this option (removal of the local needs housing policy approach to rural settlements and provision of a new Main Rural Settlement in close proximity to Coventry city administrative boundary), in combination with Option 2 have at this stage been identified as the Preferred Option to deliver the strategic growth in through the plan period.