

Rugby Borough Local Plan
Issues and Options

Land South of Rugby Road, Brinklow
William Davis Homes

February 2024

tor
&CO



Issue / revision	2	Prepared by	██████████
Reference	273901	Signature	NT
This document is issued for		Date	1 February 2024
<input type="checkbox"/> Information	<input type="checkbox"/> Approval	Checked by	██████████
<input type="checkbox"/> Comment	<input checked="" type="checkbox"/> Submission	Signature	NT
Comments		Date	1 February 2024
		Authorised by	██████████
		Signature	NT
		Date	1 February 2024
		Please return by	N/A

© tor&co 2024. All rights reserved.

No part of this document may be reproduced in any form or stored in a retrieval system without the prior written consent of the copyright holder.

All figures (unless otherwise stated) © tor&co 2024.

©Crown Copyright and database rights 2022 OS Licence no. AC0000849896

Contains OS data © Crown copyright and database right 2022. Licensed under the Open Government Licence v3.0.

Aerial imagery © Getmapping plc

Contents

1. Introduction	2
2. Local Plan Issues and Options	5
Chapter 7: Climate Change Policies	
Chapter 8: Design Coding and Guidance	
Chapter 9: Land for Housebuilding	
3. Conclusion	12

Appendices

1. Coventry & Warwickshire Housing Needs Report, prepared by RPS dated 27 September 2023
2. Land South of Rugby Road – Brinklow: A Vision, prepared by tor&co dated February 2024

1.0 Introduction

- 1.1 These representations have been prepared and submitted by tor&co to the Rugby Borough Local Plan Issues and Options (Regulation 18) consultation on behalf of William Davis Homes (WDH). A separate Call for Sites submission using the Council's standard proforma has been submitted alongside these representations. WDH has no comments to make on the Sustainability Appraisal Scoping Report (dated October 2023) at this time.
- 1.2 WDH forms part of a consortium of housebuilders that commissioned RPS Group Limited (RPS) to undertake a full review, critique, and evaluation of the assessment of the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA, dated November 2022), which underpins the Issues and Options Plan. Accordingly, these representations refer to the RPS *Coventry & Warwickshire Housing Needs Report* dated 27 September 2023 (reference: JBB9150/9151/9152), which is reproduced at Appendix 1. The report concludes that the assessment of local housing need in Coventry and Warwickshire should be based on the Standard Method preferred by Government. RPS contends that exceptional circumstances to justify a departure from using the Standard Method have not been demonstrated. The Levelling-up and Regeneration Act (LURA) 2023 requires that plan-makers progressing "old style" plans must accord with existing legal duties and requirements, including the Duty to Cooperate, until 30 June 2025. Rugby Borough Council must therefore provide sufficient housing to meet its housing needs and an appropriate proportion of unmet need across the Coventry and Warwickshire Housing Market Area (HMA). Consequently, an increase in the proposed housing target for the Rugby Borough Local Plan Review is required.
- 1.3 WDH controls 5.2 hectares of land to the south of Rugby Road, Brinklow. The site has the potential to accommodate around 100 dwellings, public open space and additional landscape planting. It offers an exciting opportunity to establish a new neighbourhood within easy reach of the wide range of facilities that are available nearby. Delivery of the site would contribute positively towards meeting local housing needs, including affordability and new affordable homes, in Brinklow.
- 1.4 In accordance with the definition of "deliverable" in the National Planning Policy Framework (NPPF) (last updated 20 December 2023), WDH's site at Brinklow is available now, offers a suitable location for development now and provides a realistic prospect for delivery within 5 years.
- 1.5 The vision document "*Land South of Rugby Road – Brinklow: A Vision*" (February 2024) is provided at Appendix 2. It provides a robust analysis to support how a development of around 100 dwellings can be delivered on this site, including an illustrative masterplan. The vision document has been submitted as part of the Council's Call for Sites process alongside these representations.
- 1.6 The overall purpose of these representations is to support Rugby Borough Council in preparing a robust Local Plan Review capable of adoption by meeting the various legal, procedural, and tests of soundness required by paragraph 35 of the NPPF. These representations focus on the following chapters of the Issues and Options consultation document:

- Chapter 7: Climate Change Policies
- Chapter 8: Design Coding and Guidance
- Chapter 9: Land for Housebuilding

- 1.7 For the reasons set out in these representations, WDH is broadly supportive of the Council's strategy to address climate change. However, measures to support net zero residential development and biodiversity net gain (BNG) should be led by national legislation, policy and regulations to ensure that a consistent approach is applied across the UK, in consultation with the house building industry. Provision of more onerous local policy requirements would potentially risk the viability of delivering new housing and/or reduce affordability in the borough.
- 1.8 WDH recognises that the Council needs to comply with NPPF paragraph 138 on the need to ensure it has access to, and make appropriate use of, tools and processes for assessing and improving the design of development – i.e. through the preparation and use of design codes. To ensure the Local Plan Review is prepared in a timely manner, should the Council decide to prepare any design codes as part of the Local Plan process, WDH considers that these should be area based and relatively strategic in nature, for example, by providing guiding principles for new development. Policies should allow for a degree of flexibility, to ensure that individual sites can respond to detailed local design considerations as necessary. Detailed design codes can be progressed as part of planning applications or through an SPD if necessary.
- 1.9 Regarding land for housebuilding, WDH strongly considers that the Council should increase the proposed housing targets to meet housing needs in the Coventry and Warwickshire HMA calculated using the Standard Method. An appropriate number of housing allocations will need to be identified in sustainable locations to meet an increase to the housing target. In this regard, Brinklow should be considered as a suitable location for new housing development. Accordingly, the Rugby Borough Local Plan Review Rugby should assess the merits of WDH site at Land South Of Rugby Road, Brinklow as part of the plan-making process.
- 1.10 We would be pleased to arrange a meeting with policy officers to discuss the opportunities that would be provided by this site.

William Davis Homes

- 1.11 Based in Leicestershire and trading for over 85 years, WDH is one of the Midlands' leading independent house builders, with a track record in Rugby Borough through the Cawston Rise development together with other award-winning sustainable communities across the region.
- 1.12 WDH prides itself on utilising locally sourced supply-chains and tradespeople, to ensure the delivery of homes of the highest standard. Best practice underpins the culture of the company, which is reflected in its five star status for 7 years running, as rated by the Homes Builders Federation's annual survey of homeowners.
- 1.13 By identifying sustainable and appropriate sites for development, WDH is able to build residential development that supports local communities and responds

to the Climate Emergency through a strategy of environmental enhancement. This includes the planting of over 700 trees and 2,000m of hedgerow to ensure appropriate offset and measurable improvements.

2.0 Local Plan Issues and Options

Chapter 7: Climate Change Policies

Question 21 Should we adopt a minimum tree canopy policy for new development

- 2.1 The Environment Act's requirement to achieve a minimum 10% BNG is the appropriate means to maximise the biodiversity of development sites, including provision of new tree planting and other green infrastructure to minimise the impact of climate change. The addition of a minimum tree canopy cover policy for new development would be onerous, conflict and potentially contravene the Defra BNG metric, potentially affect viability of development sites, and would thereby undermine the deliverability and overall effectiveness of the plan.

Question 22 Should we identify priority locations or allocate sites for sites, which are unable to provide all the net gain on site and, if so, where?

- 2.2 WDH would support, in principle, the identification of priority locations or sites for the purpose of securing BNG for development sites that are unable to provide all of their own BNG on site. This would help to ensure that the plan is effective and deliverable over the plan period. In order to achieve effective BNG, these BNG locations/sites should either be located on land managed exclusively for nature conservation purposes or at existing/new country park sites that, despite being publicly accessible, are managed appropriately to maximise BNG.

Question 23 Would you support the creation of additional country parks as part of delivering biodiversity net gain?

- 2.3 As above, in principle, WDH would support the creation of additional country parks as part of delivering BNG for development sites where their own BNG cannot be met on site.

Question 24 Should we require developers to prioritise the delivery of biodiversity gain within close proximity to the development?

- 2.4 Having to secure BNG within close proximity to a development is difficult to define and likely to be onerous for many sites. It may also subject development sites to potential ransom requests by nearby landowners. WDH would support a borough-wide approach which seeks to allocate BNG receptor sites as part of the Local Plan Review. This would help to ensure effective delivery of development sites and BNG during the plan period. Furthermore, provision of strategic green infrastructure networks and corridors are known to be more effective at achieving BNG than individual pockets of habitat.

Question 25 We are considering requiring all new residential developments to be net zero. Do you agree?

- 2.5 A key objective of the LURA is to streamline the town planning system. Building Regulations and National Development Management Policy (NDMP) form part of a national planning framework designed to avoid repetition at the local plan-making stage. Government sets standards for energy efficiency through the Building Regulations. The key to success is standardisation and

avoidance of individual councils specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. Rugby Borough Council does not need to set local energy efficiency standards to achieve the shared goal of net zero emissions because of the higher levels of energy efficiency standards for new homes set out in the current Building Regulations and proposed Future Homes Standard that will come into effect in 2025. From 2025, the Future Homes Standard will ensure that new homes will produce at least 75% lower CO₂ emissions than those built to current energy efficiency requirements¹. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises. WDH supports an approach that moves towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable.

- 2.6 Overall, WDH does not agree that the Local Plan Review should include a policy requiring all new residential developments to be net zero. As noted above, this would likely result in significant viability constraints and undermine the effectiveness and deliverability of the plan. It is also unnecessary due to national Future Homes Standard, which will become mandatory in 2025.

Chapter 8: Design Coding and Guidance

Question 29 Should we produce design codes as part of our new local plan?

- 2.7 WDH does not consider that the Council needs to produce detailed design codes for individual sites as part of the new Local Plan. The Council recognises that it does not have the expertise to produce design codes and would need to instruct consultants to assist their preparation. The cost of preparing design codes should be minimised at the plan making stage. To ensure the Local Plan Review is prepared in a timely manner, should the Council decide to prepare any design codes, WDH considers that these should be area based and relatively strategic in nature, for example, by providing guiding principles for new development. For development sites, a design code can be inserted as a policy requirement for individual site allocations or prepared through an SPD if necessary.

Question 30 Which areas should design codes cover?

- 2.8 As noted above, should the Council decide to prepare any design codes, these should be relatively strategic in nature. For example, this could comprise Borough-wide (divided into character areas if necessary) design code principles, which include a mix of 'must' (mandatory), 'should' (expected) and 'could' statements. The Borough-wide design coding should allow for a degree of flexibility, to ensure that individual sites can respond to detailed local design considerations as necessary.

¹ <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

Chapter 9: Land for Housebuilding

Question 31 How many homes should we be planning for?

- 2.9 The Issues and Options consultation document provides 3 options, as follows:
- Minimum local housing need
 - The HEDNA 2022 need
 - Other
- 2.10 The Government's starting point for assessing housing need is the Standard Method. For any alternative projections to be justified as the basis for assessing local housing need, the assumptions need to be robust and that exceptional local circumstances exist.
- 2.11 The Issues and Options document endorses the housing need evidence contained in the Coventry and Warwickshire HEDNA. The HEDNA uses Census 2021 data, which establishes a decrease in the housing need figure for the HMA against the figure derived by the Standard Method.
- 2.12 The RPS *Coventry & Warwickshire Housing Needs Report* at Appendix 2 provides a comprehensive analysis of the HEDNA and the lack of exceptional circumstances to justify a departure from the Standard Method. WDH would strongly suggest that the bar for justifying exceptional circumstances is high and the HEDNA fails demonstrate that these exist.
- 2.13 Specifically, the RPS report concludes:
- The economic baseline would suggest that recent economic performance in Coventry broadly reflects the level of growth seen both regionally and nationally; it does not highlight anything exceptional has occurred in Coventry. Similarly, the house price trends during 2010-2020 in Coventry do not indicate evidence that anything exceptional has occurred.
 - The principal focus of a move to an alternative projection methodology in the HEDNA is to support an alternative projection for Coventry. This approach has very little to do with justifying any alternative approach for the other constituent authorities in Coventry and Warwickshire. This approach is not justified.
 - The HEDNA uses the Census 2021 outputs as a starting point for the alternative projections. It must be assumed the Census 2021 is sufficiently robust for this exercise. However, as highlighted in the HEDNA (paragraph 5.92) this may not be the case. Consequently, it is questionable whether the Census outputs should be used in any aspect of the forward planning exercise until they have been properly verified by ONS. RPS suggests that measures have already been taken to address methodological issues relating to student population numbers, through the Higher Education Leavers Methodology (HELM), which was applied to the official population estimates from 2017 onwards. It is likely that potential under-estimation of move out of the area, notably Coventry, has been addressed and so is not a significant factor in determining population estimates after this date, and has been exaggerated in the HEDNA.

- The approach taken in the HEDNA to defining the population assumptions is convoluted and complicated, with many assumptions used that have not been adequately explained (and the acknowledgement that these are likely to be incorrect). RPS contends that the analysis cannot be relied upon as a robust and credible basis for a forward projection of population.
 - The alternative 'trend-based' approach in the HEDNA will not meet the full housing needs of the HMA, and results in a lower figure compared to the Standard Method (around 600 fewer dwellings per annum). This runs the risk of under-supply of housing, which could result in worsening affordability of housing and a reduction in the provision of affordable housing to meet the needs of those households on lower incomes. At a time of a cost of living crisis and other inflationary pressures on households, restricting the supply of housing will undoubtedly cause further hardship for many people seeking to access housing in the area.
 - RPS raises concerns regarding the deliverability and developability of certain elements of the supply from remaining site allocations, and the justification given for the proposed windfall allowance. RPS contends that the supply-side provision of housing forecast by the Council is over-optimistic and is not suitably evidenced. It is the view of RPS that the need-supply shortfall, or unmet need, emanating from Coventry will continue based on the current evidence.
- 2.14 Overall, the assessment of local housing need in Coventry and Warwickshire should be based on the Standard Method preferred by Government for assessing local housing need. No exceptional circumstances have been demonstrated to justify an alternative approach.
- 2.15 As noted earlier, the LURA 2023 requires that plan-makers progressing "old style" plans must accord with existing legal duties and requirements, including the Duty to Cooperate, until 30 June 2025. Rugby Borough Council must therefore provide sufficient housing to meet its housing needs and an appropriate proportion of unmet need across the Coventry and Warwickshire HMA, in accordance with the existing Memorandum of Understanding (MoU). The Council is embarking on a Local Plan Review and, consequently, the Duty to Cooperate and existing MoU still applies. In this regard, paragraph 67 of the NPPF requires that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas in accordance with the existing MoU) can be met over the plan period. Significantly, the under-estimation of housing need in Coventry and across the HMA could have unforeseen and unintended consequences for Rugby Borough, by risking undermining the future health of the local economy, worsening housing affordability and reducing the provision of affordable housing to meet the needs of those households on lower incomes. Use of the Standard Method would protect against this scenario and ensure that a sound plan is prepared that is positively prepared, justified, effective, and consistent with national policy in accordance with paragraph 35 of the NPPF.
- 2.16 The Council should increase the proposed housing targets to meet housing needs in the Coventry and Warwickshire HMA to reflect the Standard Method.

2.17 Furthermore, the tables on page 51 of the Issues and Options document provide two housing need scenarios: (1) a plan period to 2039 and (2) a plan period to 2050. Whilst the Council's Local Development Scheme (LDS) targets adoption by December 2026, this would appear to be a highly optimistic scenario. Accordingly, establishing a plan period and associated housing land supply to 2050, based on the Standard Method and having regard to the unmet housing needs of neighbouring areas, would provide a strong basis for preparing a sound plan with a robust long-term supply of housing. Importantly, a plan period to 2050 would de-risk a scenario of having to modify the plan period at a later stage to ensure a minimum 15-year period (at substantial time and cost) should the plan's preparation become protracted, which we would suggest is very likely based on past trends.

Question 33 Please provide any comments. You have on the suitability of any of the broad locations ... for new housing. Are there any locations that we have missed?

- 2.18 The Issues and Options document acknowledges that the Council has yet to produce a Housing and Economic Land Availability Assessment (HELAA). Consequently, the consultation document simply identifies several broad locations where housing could be built. Currently, these broad locations exclude Brinklow village. WDH would strongly support the identification of Brinklow as a location for new housing.
- 2.19 The adopted Local Plan identifies Brinklow as a Main Rural Settlement, reflecting its broad range of services and its position as a centre that provides local services for its population and immediate catchment. Rugby's identified housing need is significant. Therefore, the Council's spatial strategy should provide for sustainable growth across the plan area, providing new housing in a range of locations including main rural settlements.
- 2.20 Brinklow was not allocated housing in the adopted Local Plan. Consequently, the availability of housing for local people, affordability of housing, and access to affordable housing in Brinklow are matters that must be addressed in the Local Plan Review. Assisting households in remaining local is recognised in the HEDNA as difficult due to the lack of suitable and financially accessible family homes coming forward in rural areas (HEDNA; pages 254-255).
- 2.21 Paragraph 83 also recognises that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the viability of rural communities. It adds that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. In this regard, there is currently only one primary school in and around Brinklow (the Revel Primary School in Monks Kirby). Brinklow previously had an infant school but this closed due to falling rolls and very low numbers. The number of children in Brinklow and the surrounding villages is low, due to an aging population. WDH's Brinklow site would provide a sustainable solution in this regard. Furthermore, WDH has held initial discussions with Warwickshire County Council, which has confirmed that a new development in Brinklow would likely help to sustain the Revel Primary School.
- 2.22 Positioned on the Coventry Way (a 40-mile public footpath that circumnavigates the city of Coventry) Brinklow is located in an accessible location. The village benefits from ease of access to both Rugby and Coventry with hourly buses between the two settlements (service no. 85) from bus stops located on

Coventry Road. The bus service allows access to a wider service base and employment opportunities. The village itself benefits from a range of amenities, including a GP surgery, community church hall, post office, recreation ground and multiple public houses. As noted above, the provision of new housing in Brinklow would support these local services in accordance with the NPPF.

- 2.23 The Vision document at Appendix 2 provides a vision for WDH's site at Land South of Rugby Road, Brinklow. The site has potential to provide around 100 dwellings, public open space, additional landscape planting, and ancillary infrastructure including drainage. It offers an exciting opportunity to establish a new neighbourhood within easy reach of the wide ranging facilities that are available nearby. The village's services and amenities are located within a short walking distance of the site and would not require use of a private car. The bus stops located on Coventry Road, 150m west of the site, provide public transport options to access Rugby and Coventry. In addition, the site is unconstrained by environmental designations.
- 2.24 Whilst the site is located in the Green Belt, paragraph 145 of the NPPF provides that authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are full evidence and justified. WDH strongly considers that the housing need of Rugby Borough provides the necessary evidence and justification to demonstrate exceptional circumstances for Green Belt release, irrespective of whether the Standard Method or the Council's HEDNA approach is followed.
- 2.25 WDH's Brinklow site does not perform strongly against the strategic purposes of the Green Belt, as defined at paragraph 138 of the NPPF. The Coventry & Warwickshire Joint Green Belt Study Part 2 (2016) identifies that Parcel BR3, which includes the WDH's Brinklow site, confirms that the site performs poorly against Strategic Purposes 1-4 as per paragraph 143 of the NPPF. This supports the case for Green Belt release in this location.
- 2.26 Overall, WDH's site in Brinklow is a suitable and deliverable option for new housing growth that can contribute towards meeting local and strategic need. Furthermore, its delivery would secure a sustainable development that can support local services and amenities.
- 2.27 The merits of the site are clearly articulated in detail within the Vision document at Appendix 2.

Question 34 Do you support a requirement for all new dwellings to meet the additional Building Regulations standard for accessible and adaptable dwellings and for at least ten percent of dwellings to be suitable for wheelchair users?

- 2.28 At this stage, WDH does not consider it appropriate to impose a requirement for all new dwellings to meet the optional Building Regulations standard for accessible and adaptable dwellings and for at least 10% of dwellings to be suitable for wheelchair users. The provision of accessible/adaptable and wheelchair dwellings should remain optional for developers to meet according to local circumstances and market demand. Further evidence is necessary to justify the Council's suggested approach.

Question 35 Please provide any other comments you have on the type and size of new homes we need

- 2.29 The suggested housing mix in the HEDNA is a reasonable starting point. However, it should be kept under review as the plan progresses, whilst the forthcoming housing mix policy that will be included in the next draft of the plan should provide some flexibility for developers to ensure sites can respond to local circumstances and market demand at the planning application stage.

3.0 Conclusion

- 3.1 WDH welcomes the opportunity to engage with and respond to the Rugby Borough Local Plan Issues and Options consultation. These representations have responded to issues relating to Climate Change, Design Coding and Land for Housebuilding.
- 3.2 WDH believes strongly that the assessment of local housing need in Coventry and Warwickshire should be based on the Standard Method which remains the preferred approach for assessing local housing need at this time. No exceptional circumstances have been demonstrated to justify an alternative approach. It is critical that Rugby Borough Council follows the Standard Method having regard to unmet needs across the HMA, in accordance with the existing MoU.
- 3.3 Significantly, the under-estimation of housing need in Coventry and across the HMA could have unforeseen and unintended consequences for Rugby Borough, by risking undermining the future health of the local economy and worsening housing affordability and reducing the provision of affordable housing to meet the needs of those households on lower incomes. Use of the Standard Method would protect against this scenario and ensure that a sound plan is prepared that is positively prepared, justified, effective, and consistent with national policy in accordance with paragraph 35 of the NPPF.
- 3.4 The Council should increase the proposed housing targets to meet housing needs in the Coventry and Warwickshire Housing Market Area to reflect the Standard Method. Furthermore, the plan period should be extended to 2050 to provide a strong basis for preparing a sound plan with a robust supply of housing of at least 15 years from adoption.
- 3.5 Regarding the proposed broad locations for new housing, the Issues and Options document does not identify Brinklow village as a location to accommodate new homes. Brinklow is a Main Rural Settlement, reflecting its broad range of services and its position as a centre that provides local services for its population and immediate catchment. Rugby's identified housing need is significant. Therefore, the Council's spatial strategy should provide for sustainable growth across the plan area, providing new housing in a range of locations including main rural settlements. The housing need in Rugby Borough together with the need for new homes in main rural settlements, which would address the retention of local people by improving housing affordability and the provision of affordable homes, provides the exceptional circumstances necessary to support Green Belt release in this location.
- 3.6 WDH's site at Land South of Rugby Road, Brinklow represents a sustainable and deliverable development opportunity to help meet needs the needs of local people and the wider borough. WDH requests that it be considered as a new residential allocated site in accordance with comments made in these representations.
- 3.7 WDH wishes to work positively and collaboratively with Rugby Borough Council throughout the plan making process. As a Midlands-based housebuilder, WDH has a proven track record in delivering much needed homes in the region. These representations are submitted respectfully to the Council to help ensure that sustainable and deliverable growth can be achieved during the plan period.

Appendix 1

Coventry & Warwickshire Housing Needs Report, prepared by RPS dated 27 September 2023

COVENTRY & WARWICKSHIRE HOUSING NEEDS REPORT

on behalf of South Warwickshire Consortium

150/9151/9152
September 2023

REPORT

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
V1	Coventry LP Reg 18 Reqs	DO/CAF	CAF	CAF	18.09.2023
V2	Final edits following client review	DO/CAF	CAF	CAF	29.09.2023

Approval for issue

Cameron Austin-Fell



29.09.2023

The report has been prepared for the exclusive use and benefit of our client and solely for the purpose for which it is provided. Unless otherwise agreed in writing by R P S Group Limited, any of its subsidiaries, or a related entity (collectively 'RPS') no part of this report should be reproduced, distributed or communicated to any third party. RPS does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report.

The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

Prepared by:

RPS

Prepared for:

South Warwickshire Consortium

Contents

EXECUTIVE SUMMARY	1
1 INTRODUCTION	3
2 DEMOGRAPHIC ANALYSIS: THE CASE FOR EXCEPTIONAL CIRCUMSTANCES	4
National Policy Context	4
General comments on exceptional local circumstances	4
Considering overall development need for housing	6
Summary on exceptional circumstances	14
3 DEMOGRAPHIC ANALYSIS: HEDNA ALTERNATIVE APPROACH TO CALCULATING HOUSING NEED	16
Establishing a base population estimate	16
Developing Trend-based Population Projections in Coventry and Warwickshire	19
Household Projections	21
Summary on the trend-based approach	21
4 URBAN CAPACITY ISSUES	23
Current anticipated supply 2021-2041	23
Past net completions to date (2021-2023)	23
Sites with planning permission	24
Call for brownfield sites	24
Local Plan Allocations – remaining capacity	24
Windfall allowance	25
Concluding remarks on supply	26
5 CONCLUSIONS	27

Tables

Table 2-1 Comparison between population estimates (2020) and Census 2021 counts – Top 20 Cities in England	8
Table 2-2 Dwelling Stock Growth (2011-20) – Coventry in context	12
Table 2-3 Changes in Median House Prices Paid: Top 20 cities and urban centres, 2011-2020	14
Table 3-1 Estimated population in Coventry & Warwickshire: MYEs and comparators (2020)	17
Table 4-1 Projected windfall delivery – Coventry to 2039	25

Figures

Figure 2-1 Estimated population change, 2011 and 2020 - Bristol	11
---	----

EXECUTIVE SUMMARY

This report has been drafted on behalf of the South Warwickshire Developer Consortium (“the Consortium”) to respond to the Issues and Options (“IOD”) Regulation 18 version of the Coventry Local Plan. The Forum are a consortium of housebuilders who operate in the Coventry and Warwickshire Area. For the purpose of this consultation, the Consortium consists of the following members:

- Taylor Wimpey Strategic Land;
- Miller Homes; and
- William Davis Homes.

The report seeks to address the main findings and underlying assumptions presented in the Coventry & Warwickshire Housing & Employment Development Needs Assessment (“HEDNA”) used to inform the IOD 2021-2041 consultation, held during September and October 2023.

RPS recommends that the Council takes on board the matters raised in this report as part of refining the evidence as the Plan review moves forward.

The main issues and conclusions drawn from the analysis are summarised below.

- The Government’s starting point for assessing housing need is the Standard Method. For any alternative projections to be justified as the basis for assessing local housing need, the assumptions need to be robust and that exceptional local circumstances exist. RPS contend that such exceptional circumstances do not exist.
- The economic baseline would suggest that recent economic performance in Coventry broadly reflects the level of growth seen both regionally and nationally; it does not highlight anything exceptional has occurred in Coventry. Similarly, the house price trends during 2010-2020 in Coventry do not indicate evidence that anything exceptional has occurred.
- The principal focus of a move to an alternative projection methodology in the HEDNA is to support an alternative projection for Coventry. This approach has very little to do with justifying any alternative approach for the other constituent authorities in Coventry & Warwickshire.
- The HEDNA uses the Census 2021 outputs as a starting point for the alternative projections. It must be assumed the Census 2021 are sufficiently robust for this exercise. However, as highlighted in the HEDNA (paragraph 5.92) this may not be the case. Consequently, it is questionable whether the Census outputs should be used in any aspect of the forward planning exercise until they have been properly verified by ONS. RPS suggests measures have already been taken to address methodological issues relating to student population numbers, through the Higher Education Leavers Methodology (HELM), which was applied to the official population estimates from 2017 onwards. It is likely that potential under-estimation of move out of the area, notably

Coventry, have been addressed and so is not a significant factor in determining population estimates after this date, and has been exaggerated in the HEDNA.

- The approach taken in the HEDNA to defining the population assumptions is convoluted and complicated, with many assumptions used that have not been adequately explained (and the acknowledgement that these are likely to be incorrect). RPS contend that the analysis cannot be relied upon as a robust and credible basis for a forward projection of population.
- The alternative 'trend-based' approach in the HEDNA will not meet the full housing needs of the C&WHMA, and results in a lower figure compared to the standard method (around 600 fewer dwellings per annum). This runs the risk of under-supply of housing, which could result in worsening affordability of housing and a reduction in the provision of affordable housing to meet the needs of those households on lower incomes. At a time of a cost of living crisis and other inflationary pressures on households, restricting the supply of housing will undoubtedly cause further hardship for many people seeking to access housing in the area.
- RPS contends that the assessment of local housing need in Coventry & Warwickshire should be based on the standard method preferred by Government and which remains their formal approach for assessing local housing need at this time.
- RPS raises concerns regarding the deliverability and developability of certain elements of the supply from remaining site allocations, and the justification given for the proposed windfall allowance. RPS contend that the supply-side provision of housing forecast by the Council is over-optimistic and is not suitably evidenced. It is the view of RPS that the need-supply shortfall, or unmet need, emanating from the City will continue based on the current evidence.

1 INTRODUCTION

- 1.1 The purpose of this report is to provide a response to the Coventry & Warwickshire Housing and Employment Development Needs Assessment, November 2022 (“HEDNA”).
- 1.2 The report has been prepared on behalf of the South Warwickshire Consortium (“the SW Consortium”) and is their formal representation to the Coventry Local Plan Issues and Options (Regulation 18) consultation (“IOD”) on matters relating to housing need and supply.
- 1.3 The report has been prepared in the context of national policy and guidance, which requires local housing need to be based on the standard method ‘unless exceptional local circumstances’ have been demonstrated to justify the use of any alternative methodology.
- 1.4 The report is structured in order to assess the presence of exceptional local circumstances, consideration of the HEDNA approach to alternative projections, other factors that might point to further adjustments, for example economic growth, and land supply matters relevant at this stage.
- 1.5 For formalities sake, a representation form summary sheet has been prepared separately on the relevant questions in the IOD consultation, to which this report is appended.

2 DEMOGRAPHIC ANALYSIS: THE CASE FOR EXCEPTIONAL CIRCUMSTANCES

National Policy Context

- 2.1 Paragraph 61 of the National Planning Policy Framework (NPPF) makes clear that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance, unless exceptional circumstances justify an alternative approach.
- 2.2 Planning Practice Guidance (PPG) clarifies that, whilst the use of the standard method is not mandatory, if it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely at examination (PPG 2a-003). This is especially the case where the alternative approach results in a lower housing need figure than that identified using the standard method (PPG 2a-015), as is the case in the Council's latest evidence.

General comments on exceptional local circumstances

Study requirements

- 2.3 Paragraph 1.5 of the HEDNA identifies the key requirements of the study brief, notably to consider overall housing need within the Study area '*having regard to the standard method*'. The result is an overall housing need projection that is lower than the standard method figure for the C&WHMA.
- 2.4 Paragraph 1.8 of the HEDNA points to 'notable commuting flows between Coventry and the wider South Warwickshire authorities' and the 'important role that Coventry plays as an employment, retail, cultural and service centre for the wider sub-region'. The 'hub and spoke' nature of the relationship between Coventry and the wider HMA is a key facet in the overall economic prosperity of the sub-region which should be fostered and supported through appropriate levels of housing growth. Measures seeking to reduce the level of housing growth across the HMA could have unforeseen and unintended consequences which risks undermining the future health of the local and sub-regional economy. This needs to be considered as part of the assessment process.

Recent events

- 2.5 Paragraph 1.10 explains that '*initial work on preparing the HEDNA was undertaken in 2021*' but that '*the project was however paused to reflect uncertainties associated with demographics, pending the release of data from the 2021 Census. The HEDNA report has then been finalised in Autumn 2022 with demographic analysis and modelling of housing need capturing initial Census data released on 28th June 2022.*'
- 2.6 RPS would simply point out that, whilst representing an official data source, demographic information in the Census is merely a snapshot in time (and does not, of itself, represent a trend) and so is merely one variable amongst many different inputs, including official mid-year population estimates, relied upon to help project forward demographic change into the future. The importance

or significance of the Census outputs should be seen in this wider context and should not be given undue or elevated status in the assessment process.

Economics Baseline

- 2.7 Paragraph 2.2 (and Figure 2.1) of the HEDNA highlights that historically growth in GVA has slightly out-performed regional and national trends, with growth of 47% achieved between 2001-19 (reflecting stronger performance since 2013) compared to 33% and 35% at a regional and national level. Nonetheless, GVA growth rate in Coventry (2.0%) has been notably weaker in comparison to the sub-region as a whole (see Figure 2.2) and broadly similar to the UK growth rate (1.9%). Similarly, productivity (GVA per job, Table 2.3) in Coventry sits within the range between regional and national levels, but is lower compared to the sub-region. Employment growth between 2011-2019 in Coventry is also very similar to the levels seen sub-regionally (Table 2.7).
- 2.8 The evidence would suggest that recent economic performance in Coventry largely reflects the level of growth both regionally and nationally and which has, based on the analysis, seen relatively weaker growth compared to the wider sub-region. This does not highlight anything exceptional has occurred in the economic baseline in Coventry, and also points to the need for measures to support and encourage more growth to help bolster the role of Coventry as the main economic centre in the sub-region.
- 2.9 Furthermore, planning future growth based on lower housing targets derived for Coventry could undermine the wider economic growth ambitions of the West Midlands Combined Authority (WMCA), in particular the 'Plan for Growth', of which Coventry City Council is a constituent member, which include inter alia proposals to upskill and retrain both the future and current workforce¹.

Housing Market Dynamics

- 2.10 The HEDNA has reviewed various published datasets relating to the housing market across Coventry and Warwickshire. The data presented largely covers the period to 2020.
- 2.11 Regarding house prices, paragraph 4.3 of the HEDNA highlights that median prices across the sub-region to December 2020 are considered to be 'modestly above the average' both regionally and nationally reflecting recent house price growth. The lowest prices were observed in Nuneaton & Bedworth, with the next lowest being Coventry, reflecting market conditions in those areas. RPS does not consider house prices in Coventry to be significantly different to other major urban areas elsewhere in the region. In addition, Figure 4.1 of the HEDNA shows that house price trends during 2010-2020 for the sub-region are broadly consistent with trends across the West Midlands and nationally; whilst growth rates to September 2020 (Figure 4.2) within the sub-region show that Coventry has grown at a rate consistent with other authorities. This summation indicates that

¹ <https://www.wmca.org.uk/what-we-do/economy-and-innovation/plan-for-growth/>

changes in house prices within the sub-region are not significantly different in comparison to other areas or scale of analysis for Coventry and so is not considered to represent evidence of anything exceptional in the data.

- 2.12 Similarly, qualitative analysis based on information from local agents at paragraph 4.47 of the HEDNA indicates that the supply of homes could not keep up with demand in Coventry, showing there is a need for more (not less) housing to meet the needs of the city.
- 2.13 The SW Consortium are also concerned that through setting a lower housing target across the CWHMA as whole, the Council are undermining the City's ability to secure developer contributions and commuted sums to help facilitate delivery of the ambitious and large-scale infrastructure that are being planned for, i.e. NUCKLE rail services proposals, as well as other sustainable transport proposals including the Toll End Bar to Coventry and segregated cycle route, which will require developer contributions to deliver them.
- 2.14 In addition, in terms of the mix of housing, SW Consortium are also concerned that by reducing the quantum of housing, this would undermine policies to help increase the delivery housing to help retain recent graduates, as well as helping to increase family housing which is acknowledged in the Council's evidence as only forming a limited proportion of the overall supply².

Considering overall development need for housing

- 2.15 In chapter 5 of the HEDNA, it is suggested that the use of the standard method as set out in national planning guidance is not an appropriate basis for the assessment of housing need for the Coventry and Warwickshire authorities, and that an alternative approach is justified. This is described in the HEDNA as a 'trend-based projection'. The justification given (at paragraph 5.1) for a departure from the standard method is the recent publication of data from the Census 2021 issued during 2022, and criticisms made of Office of National Statistics ("ONS") who it is claimed is guilty of '*...significantly over-estimating population growth in Coventry and this seems to be confirmed through Census data.*'

Divergence from the Standard Method (Exceptional Local Circumstances)

- 2.16 In seeking to demonstrate that exceptional local circumstances exist, paragraph 5.16 of the HEDNA identifies what are described as two 'main considerations' of relevance, as follows:
- Firstly, that demographic data on which projections are based is 'demonstrably wrong' and 'cannot realistically' be used for trend-based projections on which the Standard Method is based; and
 - Secondly, that demographic trends have changed so much that it is 'unrealistic' to use a set of projections based on information in a trend period to 2014, which is now over 8-years old.

² Coventry City Annual Monitoring Report 2021/22

- 2.17 On the first point, RPS will show that the demographic data (notably the 2014-based projections) has not been shown to be ‘demonstrably wrong’ and it is reasonable to continue to apply the standard method in favour of the Council’s alternative ‘trend-based’ approach.
- 2.18 On the second point, it is clear that the Government does not expect more recent projections to be used and that all local authorities should use the 2014-based projections in assessing local housing need in their areas, otherwise the alternative approach will not be considered to be following the standard method (PPG2a-015). To use arguments based on the age of the 2014-based projections is clearly erroneous and should be ignored.
- 2.19 Whilst not specifically advocated in the HEDNA report, the SW Consortium are nonetheless concerned that the Council is seeking to discount any provision to account for the 35% urban centres uplift, which is a requirement under the standard method. The Council does not identify any exceptional circumstances to justify this approach.

Reviewing Population Trends

Population

- 2.20 Table 5.2 of the HEDNA provides a summary of the mid-year population estimates for the Coventry and Warwickshire authorities, at mid-2020. Table 5.3 provides rounded population figures based on the Census 2021 outputs. This shows that the population estimate in 2020 was higher than the population count based on the Census in 2021. On this basis, the HEDNA concludes (at paragraph 5.23) that the MYE is ‘substantially wrong’. Given that estimates and counts are themselves fundamentally different (they are based on different inputs, applied at different times) it is inevitable that the two figures will differ. Similarly, whilst there may be a difference for Coventry (which we address later in this report) it is evident that similar differences exist in other major cities and urban areas elsewhere across the country. This is shown in the analysis of the top 20 urban areas set out below (in Table 2.1) taken from the list of cities identified in the PPG as of December 2020³.
- 2.21 The analysis below shows that mid-year estimates were higher in ten (or half) of the top cities and urban centres, including Coventry, and lower in the other half, largely reflecting the differing nature and basis for the two data outputs.

³ Paragraph: 004 Reference ID: 2a-004-20201216 Revision date: 16 12 2020

Table 2-1 Comparison between population estimates (2020) and Census 2021 counts – Top 20 Cities in England

Top 20 cities	MYEs mid-2020	Census 2021	(+/-)
Birmingham	1,140,525	1,144,919	4394
Bradford	542,128	546,412	4284
Brighton and Hove	291,738	277,103	-14635
Bristol	465,866	472,465	6599
Coventry	379,387	345,324	-34063
Derby	256,814	261,364	4550
Kingston Upon Hull	259,126	267,014	7888
Leeds	798,786	811,953	13167
Leicester	354,036	368,572	14536
Liverpool	500,474	486,088	-14386
London (All LAs)	9,002,488	8,799,728	-202760
Manchester	555,741	551,938	-3803
Newcastle upon Tyne	306,824	300,125	-6699
Nottingham	337,098	323,632	-13466
Plymouth	262,839	264,695	1856
Reading	160,337	174,224	13887
Sheffield	589,214	556,521	-32693
Southampton	252,872	248,922	-3950
Stoke-on-Trent	256,622	258,369	1747
Wolverhampton	264,407	263,727	-680
All Cities and Urban centres	16,977,322	16,723,095	-254227

Source: ONS Population Estimates, persons, for local authorities in the UK, mid-2020; Census 2021 results (TS008)

2.22 Regardless of the reasons for the difference in figures, the published data nonetheless demonstrates that differences in population estimates and Census outputs are not exclusive to Coventry or the wider sub-region, and so this does not equate to exceptional local circumstances that would justify setting aside the standard method for assessing local housing need in this case, as is argued in the HEDNA.

Age structure

2.23 Paragraph 5.25-5.26 and Figure 5.1 of the HEDNA illustrate that, at 2020, the population in Coventry is relatively younger in profile compared to the wider sub-region, region and nationally. The HEDNA acknowledges that this is related to the student population residing in the city. The HEDNA also points (in Figure 5.2) to the relatively higher proportion (67.5%) of people are in the 16-64 age range, again 'linked to its student population'.

2.24 As evidenced elsewhere in this submission, the student population in Coventry is acknowledged as an important consideration relevant to the assessment of future housing need in the city, given the impact it has on the overall age profile across the city. It is important that future growth projections properly account for this component of the population. RPS argue that a move away from the standard method to the alternative 'trend-based' approach in the HEDNA does not do this and so is not an appropriate basis for assessing future housing need in Coventry and Warwickshire.

2.25 Indeed, RPS would argue that a reasonable option for the emerging Plan strategy would be to seek the retention of those people in the student population within the city / HMA after they graduate, rather than simply plan for them leaving in the future.

Past Population Change

2.26 Figure 5.4 of the HEDNA shows how the age structure of the population is considered to have changed between 2011 and 2020, based on ONS mid-year estimates. The HEDNA acknowledges that for Coventry there has been a notable change over time in the age structure with the proportion of people aged in their 20s and early 30s increasing significantly, which tails off (but still shows a smaller increase) in older age groups. This is clearly reflective of Coventry City's status as a university city within the West Midlands, and so does not point towards anything inherently or substantially wrong with the MYEs.

Components of population change

2.27 Paragraphs 5.35-5.36 of the HEDNA makes reference to the issue of Unattributable Population Change ("UPC") and that this may be evident in the mid-year estimates published post-2011 which, in the case of Coventry, is suggested to have 'actually increased significantly'.

2.28 The HEDNA provides no evidence to support this assertion. In fact, UPC was addressed by ONS following the publication of the Census in 2011. This is shown in Tables 5.6 and 5.7 for years 2011/12 to 2019/20. This is confirmed by ONS in the Quality and Methodology Information ("QMI") report dated 24 March 2020, which summarised the process it followed in remedying the issue and states quite clearly:

"No adjustment for UPC was made in the 2012-based and later sets of projections or in the series of population estimates based on the 2011 Census. This was because the UPC specific to the previous decade was unlikely to be replicated in continuing subnational trends." (RPS emphasis)

2.29 The issue as to whether UPC is occurring, or has occurred, is a matter for ONS. Their published view is that this is not likely to be a problem for future population estimates (including mid-2020 figures) or later projections (in this case, the 2014-based projections). The commentary on UPC in the HEDNA is erroneous and seeks to confuse and overly complicate the assessment of housing need, and does not point to any likely exceptional local circumstances that would justify setting aside the Government's preferred approach using the 2014-based projections.

Accuracy of Population Estimates

2.30 Paragraphs 5.37 to 5.47 of the HEDNA provides a commentary on discussions between Office for Statistics Regulations ("OSR") and ONS during 2020 and 2021 regarding criticisms originally expressed by Campaign for Protection of Rural England ("CPRE") that the population estimates for Coventry were too high. The HEDNA acknowledges (see paragraphs 5.46) that it remains the case that ONS has not sought to amend either the population estimates or the (population and household) projections they feed in to. Nonetheless, RPS has some issues with the HEDNA on this matter.

2.31 Firstly, paragraph 5.44 of the HEDNA states:

“On 29 July 2021 ONS published its response [to the OSR] setting out a work plan to address the OSR recommendations. ONS recognised that there were concerns about population estimates and projections (specifically mentioning Coventry) and that this can have an impact on household projections and therefore calculations of housing need. It is notable that both ONS and the OSR have acknowledged issues with the population estimates for Coventry and its impact on the City’s calculated housing need.” (RPS emphasis)

2.32 Nonetheless, the same response from ONS also states that:

“In June 2021 we [ONS] published the latest mid-year population estimates for 2020 and an update on future plans for population and household projections after Census 2021.”

2.33 At no point in the ONS response do they accept that the population estimates or projections for Coventry are wrong and should be set aside for the purposes of calculating housing need, or that they are ‘concerned’ with them. In fact, the ONS response merely highlights the concerns are presented to them from other parties.

2.34 Secondly, the HEDNA states (at paragraph 5.46):

“...at this point no attempts have been made by ONS to amend either population estimates or the projections they feed into...”

2.35 RPS would merely point out that, based on the information available including the Census 2021 data and other information which has been submitted to it by other parties including OSR, ONS does not consider it necessary or appropriate at this time to issue amended or revised population estimates for Coventry. This is a matter that ONS is currently looking at and will publish up to date estimates and projections in due course.

2.36 And thirdly, paragraph 5.47 of the HEDNA states:

“...there are question marks over the components of change data in Coventry but no official alternative...”

2.37 This is merely an assertion made in the HEDNA but which does not reflect any official position issued by either ONS or the Government on the veracity or efficacy of the published population estimates or projections that local authorities should be using to calculate housing need in their areas, including Coventry. In fact, no change has been made to the NPPF or practice guidance regarding how housing need is to be determined, which continues to require the 2014-based sub-national projections as the starting point. Similarly, ONS has not recommended that alternative methods should be applied to the calculation of housing need due to issues with their official figures.

2.38 Taken together, RPS does not accept the suggestion made in the HEDNA that there are official concerns with the population estimates or projections from the body responsible for their production; in this case, ONS. The information relied upon in the HEDNA does not establish the existence of exceptional local circumstances in relation to the perceived accuracy of official population estimates that would justify setting aside the official projections.

Overall Population Growth

2.39 Paragraph 5.51 of the HEDNA asserts that the increase in population in Coventry based on the population estimates is caused by the ONS recording students and young people moving into the city, but not then recording them moving out. This is because, it is claimed, the population amongst those in their mid to late 20s does not show a sharp decline in 2020 as might be expected once student move out of the city (see Figure 5.9). It goes on to state:

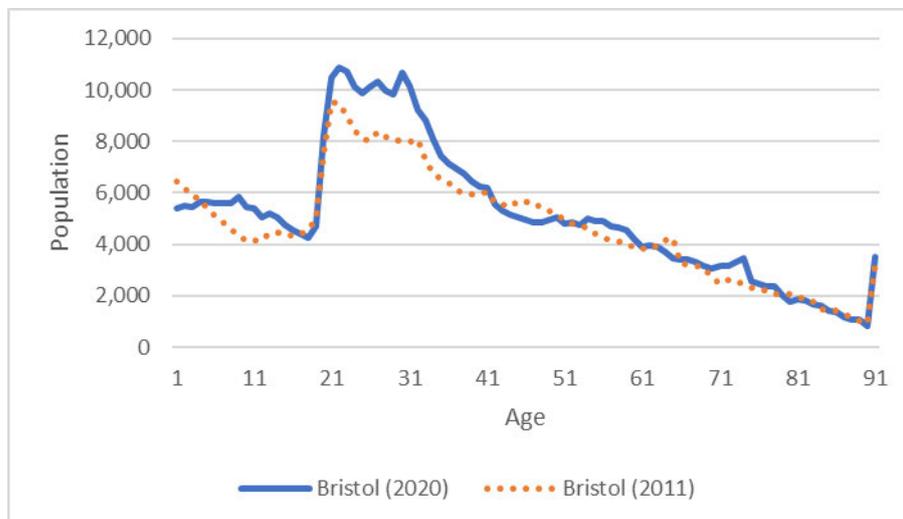
“It is possible that Coventry has seen a greater retention of students but at first glance the change from 2011 to 2020 does not look realistic.” (RPS emphasis)

2.40 The HEDNA has also sought to use data on age structure from 2011 to 2020 to support this view (see Figure 5.10). RPS would point out that the numbers of people in student age bracket (early to mid-20s) increase significantly between 2001 and 2011, and which is likely to have continued beyond 2011.

2.41 Paragraph 5.5 of the HEDNA than asserts that the projected age structure changes shown in Coventry are ‘*really quite different*’ from any other locations in the period 2011-2020. This is based on a comparison of Coventry with five other large urban centres which have a ‘notable’ student component (see Figure 5.11).

2.42 RPS has also analysed age structure for other centres ignored by the HEDNA; notably Bristol, shown below.

Figure 2-1 Estimated population change, 2011 and 2020 - Bristol



Source: ONS mid-year estimates

2.43 The analysis shows that there are other places beyond Coventry where students are likely to be moving to the area, but then staying longer, or permanently, rather than leaving shortly after graduating. In this respect, the HEDNA does acknowledge ‘some degree of retention’ of younger people is occurring in the centres surveyed, for example Birmingham. This would support the position that Coventry’s population grew at one of the fastest rates in the country (19.7%) between 2011 and 2020. RPS contends that evidence of population change in other student cities similar to Coventry undermines the suggestion in the HEDNA that ‘there must be serious doubts about the

validity of the level of population growth in Coventry', but rather it is eminently possible that population growth in Coventry is reflected in the population estimates. This is further evidence that undermines the view that exceptional local circumstances exist to justify setting aside the standard method.

Dwelling stock change

- 2.44 Paragraph 5.57 -5.58 of the HEDNA assert that the change between 2011-20 in population (19.7%) and dwelling stock (8.6%) in Coventry are somehow 'out of kilter' inferring that level of population growth in the city has been over-estimated. The HEDNA seeks to illustrate this in Figure 5.13 and Table 5.9. RPS disputes the assertion and its relevance to supporting exceptional local circumstances.
- 2.45 Firstly, mid-year population estimates and dwellings data are different in nature (one deals with people, the other with buildings) and so are not directly comparable.
- 2.46 Secondly, changes in Coventry have broadly reflected both national and regional growth in the dwelling stock over the period surveyed, as shown below.

Table 2-2 Dwelling Stock Growth (2011-20) – Coventry in context

Dwellings	2011	2020	change (11-20)	% change
England	22,976,066	24,709,834	1,733,767	7.5%
West Midlands	2,376,728	2,532,422	155,694	6.6%
Coventry	132,891	144,350	11,459	8.6%

Source: Live Table 125; HEDNA

- 2.47 And thirdly, the methodology used to collect dwelling stock statistics referred to in the HEDNA do not count communal establishments⁴, including halls of residence and other managed residential accommodation. This could account in part for the difference in changes in the population and dwelling stock as those students moving to the area and into shared accommodation would not be counted in the stock figures but would be counted in the in-migrants component of the population estimates.
- 2.48 Taken together, the changes in dwelling stock in Coventry is broadly aligned with change elsewhere at national and regional level, albeit slightly higher growth, but this does not amount to exceptional circumstances as is being suggested in the HEDNA.
- 2.49 What the data does show is that stock growth rates in other parts of the sub-region are much higher than Coventry, in particular Stratford-upon-Avon (14.5%), Warwick (9.5%) and Rugby (11.1%). This is likely the result of these areas accommodating not only their native growth, but also the unmet need from elsewhere, including Coventry (and Birmingham, to a lesser extent) between 2011-2020. This demonstrates the ability of the shire districts to meet wider than local needs when properly planned for.

⁴ <https://www.gov.uk/government/statistics/dwelling-stock-estimates-in-england-2022/dwelling-stock-estimates-england-31-march-2022-technical-notes>

Electoral register data

- 2.50 Table 5.10 and 5.11 of the HEDNA provide some information on recent changes in the numbers of people on the electoral register across the sub-region. Whilst the data is noted, it is likely that as older people move out of the area or pass on, these people are removed from the register, whilst younger residents moving into the area may be less inclined to use their vote (including some students), but this is only conjecture and is difficult to quantify. Regardless of the reasons, RPS would point out that this data does not inform the population estimates or the projections at a sub-national (or national level) under the current methodology used by ONS, and so the weight ascribed to it is minimal.

Patient Register

- 2.51 Table 5.12 of the HEDNA provides a comparison of the ONS MYEs and population records drawn from the patient register (PR). The HEDNA (see paragraph 5.63) asserts that the situation in Coventry '*...would potentially point to population estimates in Coventry being over-estimated*'. However, the HEDNA acknowledges that the PR figures should be '*...treated with caution...*' as there is a risk of double-counting due to reliance on a process of unregistering and re-registering with a new GP surgery. RPS would agree.
- 2.52 Similarly, the MYEs and PR data are different in nature and have different purposes; the MYEs are the output from an analysis of a wide range of inputs and assumptions, whilst the PR data is a single dataset. Furthermore, it must be noted that one of the inputs to the MYEs includes patient register data. RPS would agree that the patient register data should be treated with caution, but to draw direct comparisons between the official estimates and patient register data in this way is not a valid exercise and should be given limited weight in considering whether exceptional circumstances exist or not.

Other comments on Population Dynamics in Coventry

House Prices

- 2.53 Paragraph 5.70 asserts that if the population of Coventry has grown as significantly as suggested by ONS [in the MYEs] but with a relatively limited supply of new homes (as measured by the dwelling count) then it is possible that pressure on the housing stock would have seen above average increases in house prices. The HEDNA argues that is not the case in Coventry and that the analysis provided, '*...again points to estimates of population potentially having been over-estimated...*'.
- 2.54 In supporting its position, Table 5.15 of the HEDNA compares changes in median house prices for Coventry with the rest of the sub-region (Warwickshire), West Midlands, and England over the period 2011-2020. This shows that the increase in Coventry (53%) is higher on all counts, which the HEDNA acknowledges. Nonetheless, the HEDNA focuses on the absolute price of homes, which shows Coventry has the cheapest housing and therefore a more affordable place. As a

result, the HEDNA draws the conclusion that this is evidence that population estimates have been over-estimated. RPS disputes this, and draws on other comparisons as evidence.

2.55 Firstly, official data⁵ shows that median house prices increased by an average of 50.7% for all local authority areas (England and Wales⁶) between 2011 and 2020, slightly lower than the increase in Coventry. And secondly, as show below, when looking specifically at other similar areas (the top 20 cities and urban centres) of which Coventry is one, official figures show that median prices increased at an average of 47%, considerably lower than in Coventry.

Table 2-3 Changes in Median House Prices Paid: Top 20 cities and urban centres, 2011-2020

Top 20 cities and urban centres	2011	2020	Change 2011-20	% change
Birmingham	125950	194950	69000	54.8%
Bradford	118000	147500	29500	25.0%
Brighton and Hove	240000	380000	140000	58.3%
Bristol, City of	170000	290000	120000	70.6%
Coventry	122000	187000	65000	53.3%
Derby	119000	173000	54000	45.4%
Kingston upon Hull, City of	88000	120000	32000	36.4%
Leeds	140000	201500	61500	43.9%
Leicester	122000	190000	68000	55.7%
Liverpool	110500	140000	29500	26.7%
Manchester	127500	208263	80763	63.3%
Newcastle upon Tyne	130000	175000	45000	34.6%
Nottingham	95000	155000	60000	63.2%
Plymouth	142000	187500	45500	32.0%
Reading	190000	310000	120000	63.2%
Sheffield	122000	169375	47375	38.8%
Southampton	160000	223000	63000	39.4%
Stoke-on-Trent	85000	127000	42000	49.4%
Wolverhampton	115000	168000	53000	46.1%
			Av. change 2011-20	47.4%

Source: ONS Median House Prices Small Area Statistics

2.56 Taken together, the analysis above clearly shows that Coventry has experienced ‘above average’ increases in house prices during the period which does not point to any over-estimate of the population, contrary to the view expressed in the HEDNA.

Summary on exceptional circumstances

2.57 The Council’s evidence on demographic and other housing-related factors set out in the HEDNA asserts that estimates of population in Coventry as having been over-estimated in the period since

⁵ ONS House Price Statistics for Small Areas (HPSSAs) Dataset 9: Median price paid for administrative geographies, Table 2a

⁶ Excluding Greater London authorities

2011. On this basis, the HEDNA claims that exceptional local circumstances exist to justify setting aside the standard method as a basis for calculating local housing need as part of the next iteration of plan-making for the Coventry & Warwickshire HMA authorities.

- 2.58 The analysis set out in this submission disputes this assertion. RPS contends that exceptional local circumstances do not exist. Indeed, in the summary to their own analysis the HEDNA (paragraph 5.73) acknowledges that population growth in Coventry has not been exceptional, which RPS broadly agrees with (though some aspects of change, for example house prices, do show above average trends).

3 DEMOGRAPHIC ANALYSIS: HEDNA ALTERNATIVE APPROACH TO CALCULATING HOUSING NEED

Establishing a base population estimate

Population estimates for Coventry

- 3.1 Paragraphs 5.74 – 5.161 of the HEDNA provide a commentary on the approach advocated as being a robust and justified alternative to the Government's standard methodology for assessing housing need. The focus of this element of the HEDNA is to support alternative projections for Coventry.
- 3.2 The first stage in the HEDNA process is to attempt to establish a population base (at 2020) as an alternative to the MYE figure (379,387) produced by ONS. Due to the considerable uncertainty and lack of any published alternative approach, the HEDNA uses two scenarios; a completions-led; and patient register-led estimates.
- 3.3 In the dwelling-led approach, paragraph 5.78 of the HEDNA provides two outputs, though the explanation presented for this is vague. For example, at numerous points reference is made to adjustments to the published migration assumptions underpinning the MYEs. This is likely to have a considerable impact on the population estimates, but the reasons for the adjustment to migration trends is not provided.
- 3.4 Paragraph 5.78 of the HEDNA gives two alternative estimates of population in 2020 for Coventry
- 347,941 – using 2018-SHNP inputs; and
 - 341,929 – using 2014-based SNHPs
- 3.5 Paragraph 5.79 of the HEDNA notes that these figures are 'some way below' the official MYE. The HEDNA goes no further here, but RPS would point out that a dwelling completions-led will inevitably be lower than the official estimates as they are a constrained by factors such as the adopted Coventry Local Plan strategy, which distributed a significant level of its native housing growth to neighbouring areas largely as a result of the restrictive nature of the tightly drawn development Green Belt boundary that encircles the city. RPS sees no justification for a dwelling-led approach as this simply builds into future projections previous under-provision of housing delivered in the city.
- 3.6 In the patient register-led approach, whilst the outputs (349,781 and 348,381 people) are slightly higher than in the dwelling-led completions scenario shown above, the difference is not significant and still way below the MYE 2020 figure. In any event, RPS would caution (as the HEDNA already does) against the use of patient register as the starting point here because a single dataset as a basis for the forward projection is overly-simplistic, and reliant on specific actions of individuals and thus is also prone to error. The HEDNA decides that rather than selecting a preferred estimate figure, an average of the four numbers is take forward; this being estimated at a 347,008 population in 2020 for Coventry.

- 3.7 Figure 5.17 of the HEDNA provides a breakdown of the age structure in the alternative population estimate. This is assumed to provide an average number of people in each year across the four outputs referred to above, but this is not clear. Similarly, paragraph 5.84 states that “...*One notable feature is that the retention of people in their 20s (likely to be linked to students) is significantly diminished and overall it is considered that this age structure looks more plausible and is more in-line with that seen in other ‘similar’ areas...*” (RPS emphasis). It is assumed this is linked to the patient register dataset for Coventry which, as already highlighted in this submission and the HEDNA, should be treated with caution. It may also be the case that the diminishing significance of people in their 20s in Coventry is linked to adjustments in the migration assumption applied in the HEDNA, but again this is not clearly explained or justified.
- 3.8 Taken together, RPS questions the overall robustness of either scenario as an alternative to the official MYEs for 2020 issued by ONS given the concerns highlighted above.

Population estimates across Warwickshire

- 3.9 Table 5.17 of the HEDNA provides a summary of the alternative population estimates for the six constituent authorities, including Coventry. These point to higher alternative estimates for all shire districts (except North Warwickshire) compared to the MYEs. This is only a single years’ worth of data and does not constitute a projection over time.
- 3.10 Nonetheless, it can be seen that the official MYEs published by ONS are not dissimilar to the latest population projections (2018-based) and represent higher figures than the Government’s preferred starting (2014-based projections). This also raises doubts that the MYEs are significantly different from other official statistics.
- 3.11 In addition, the alternative estimates are relatively well aligned to the population for 2020 in the 2014-based projections, which continues to underpin the standard method calculation for Coventry and Warwickshire (at least for now), albeit there is some redistribution of need across the authorities in the alternative MYE. This is shown below.

Table 3-1 Estimated population in Coventry & Warwickshire: MYEs and comparators (2020)

	ONS MYEs (2020)	Estimated MYE (2020)	2014-based SNPPs (2020)	2018-based SNPPs (2020)
NWD	65,452	64,878	63,114	66,440
Nuneaton	130,373	132,093	128,979	130,406
Rugby	110,650	111,385	107,873	109,181
Stratford	132,402	134,063	124,335	131,536
Warwick	144,909	149,586	143,158	144,062
Coventry	379,387	347,008	370,238	378,966
C&W	963,173	939,013	937,698	960,591

Source: HEDNA 2022; CLG 2014-based SNPPs

- 3.12 The similarity may simply be a coincidence, but it does suggest that the official projections (2014-based) remain an appropriate starting point for assessing housing need.

Population estimates and the 2021 Census

- 3.13 The HEDNA then considers the population outputs from the 2021 Census alongside the alternative population estimates based on its own modelling.
- 3.14 Paragraph 5.90 of the HEDNA explains that in order to compare the Census population count with the HEDNA estimates, a consistent base date is needed; 2021. To do this, the HEDNA 'rolls forward' by one year the alternative estimate figure to align with the Census date. RPS questions the robustness of this approach, given the concerns highlighted earlier in this submission, and which must assume the alternative estimates and the 2021 Census is correct. However, as highlighted in the HEDNA (paragraph 5.92) this may not be the case due to the pandemic and where people were living at the time of the census count, notably amongst the student population, particularly where many students were working from home. Consequently, it is questionable whether the Census outputs should be used in any aspect of the forward planning exercise until they have been properly verified by ONS.

Students in the 2021 Census

- 3.15 Paragraph 5.94 – 5.103 provides a commentary on the potential undercount in the age groups most aligned with the student population (predominantly 20-24 and 25-29 age cohorts) due to the timing of the 2021 Census aligning with the pandemic and the impact of the lockdown policy, relating to Coventry and Warwick.
- 3.16 Figure 5.19 of the HEDNA shows that in these areas the population in 2021 amongst student age groups was largely stagnant in Coventry and lower in Warwick, compared to the population in 2011. Given these are acknowledged as being cities with sizeable student populations, it would be reasonable to expect an increase in the age groups. The outputs from the 2021 Census raise some concerns that an undercounting in those age cohorts has occurred. The HEDNA acknowledges (at paragraph 5.99-5.102) that students may be 'missing' from the 2021 Census, which the two main universities in those cities also acknowledge as being a possibility. However, this issue is essentially left hanging in the HEDNA, which states (at paragraph 103):

"For the purposes of analysis in this report, it has therefore been assumed that the Census is as accurate as it reasonably can be – and taken forward as a base position for analysis of current and future demographic trends." (RPS emphasis)

- 3.17 Given the potential for over-estimation of population in student-related age groups remains a matter under consideration by ONS, as highlighted earlier in this report, the use of the 2021 Census as a starting point for further work on alternative population estimates and projections for Coventry & Warwickshire HMA must be in question, at least until this matter has been investigated and resolved. This includes consideration of whether the 2021 Census has, in fact, undercounted a proportion of the population in Coventry and other areas in the HMA, for example due to factors relating to the pandemic.

Developing Trend-based Population Projections in Coventry and Warwickshire

Overview

3.18 Paragraph 5.108 of the HEDNA explains:

“...the analysis seeks to provide projections rebased to 2021 (Census data) and draws on ONS MYE data up to 2020 – including data about births, deaths and migration.”

3.19 The ‘driver’ for doing this is set out in the preceding commentary (paragraph 5.106) which states:

“...this is due to publication of new (2021) Census data which has essentially reset estimates of population (size and age structure) compared with previous mid-year population estimates (MYE) from ONS...”

3.20 Whether the 2021 Census has reset estimates of population remains a matter of debate, as highlighted in this report. Similarly, it must be noted that the 2021 Census and the 2020 MYEs all post-date the assumptions that underpin the official 2014-based projections and, as such, exceptional local circumstances must be shown to justify their use as part of an alternative method to the standard method preferred by Government, in line with practice guidance. As explained in this report, RPS questions the existence of exceptional circumstances to justify setting aside the standard method. Nonetheless, RPS has reviewed the HEDNA ‘trend-based’ approach and provides a response below, though this does not go into detail on the precise assumptions used in the alternative projections as there are likely to change once ONS issued revised (2021-based) projections in the near future.

Comments on the assumptions

3.21 At the outset, the HEDNA claims that (at paragraph 5.108) that many of the published data inputs to the projections ‘...are likely to be incorrect...’. Nonetheless, the HEDNA shrugs off such problems and continues with the projections. Similarly, the HEDNA (at paragraph 5.109) also acknowledges that the assumptions it has applied in its own modelling ‘...will need to be reviewed as appropriate...’ once the ONS issues the next round of projections. This suggests that considerable caution should be taken when applying these alternative scenarios in the HEDNA as part of the plan-making process and specifically the assessment of future housing need.

3.22 It is also noted that the latest sub-national population projections (2018-based) are only used for comparison purposes and ‘...not directly used in the analysis...’. There is also no reference at all to the components used in the 2014-based projections. This means the HEDNA represents a new set of population projections that have not applied the most up to date assumptions (devised by ONS) that are needed to carried out modelling i.e. data on fertility, mortality, and migration.

3.23 Consequently, the HEDNA has applied the following assumptions, summarised below:

- **Fertility:** adjustments to fertility rates taken from the ‘SNPP’ (assumed to be the 2018-based rates) to account for the claimed over-estimation of population in Coventry.

- 3.24 The adjustments to fertility rates are based on the number of births in a single year only. RPS questions whether using just one years' worth of data is sufficiently robust to underpin changes to assumptions that are then applied to projections over a longer time period (i.e. 10 years). This is important as rates are projected to fall in the shire districts in Warwickshire (Table 5.24) which would have a downward pressure on population growth estimates.
- **Mortality:** a similar approach is applied to mortality rates as has been used in fertility rate adjustments.
- 3.25 In all constituent authorities, mortality is projected to increase (Table 5.25) but has again been derived from a single years' worth of data. This would act further to push future population growth downwards, thus leading to lower population projections overall.
- **Migration:** uses a ten-year trend (2010-2020) assumption, adjusted to account for the differences between the MYE 2020 and 2021 Census.
- 3.26 The HEDNA acknowledges that the migration adjustments are derived from a 'complicated' analysis (paragraph 5.123), as the process follows a number of stages and applies numerous assumptions which are not clearly explained.
- 3.27 For example, Table 5.27 of the HEDNA provides a comparison of population estimates between MYEs 2011-2020 (and assumes a figure for 2021, but this is also not clearly explained) and the 2021 Census for the sub-region as a whole; covering the period 2011-2021. The table shows that estimates in the MYEs are 29,337 higher than the 2021 Census. The HEDNA attributes all of the difference solely to migration. The HEDNA (paragraph 5.126) assumes that 50% of the difference is due to an under estimate of in-migration, and 50% to an under-estimate of out-migration. However, the HEDNA provides no evidence to justify this assumption.
- 3.28 The outcome is that the HEDNA (see Table 5.29) assumes that 29,337 fewer people migrated into Coventry & Warwickshire between 2011 and 2021. This fits the difference between the MYEs and the 2021 Census in table 5.29, but results (see Figure 5.2, page 124) in a very different migration trend in the HEDNA trend-based model compared to past trends seen in the MYEs published by ONS.
- 3.29 Furthermore, the SW Consortium notes from the Issues and Options document (see commentary relating to question 6) that partners in the sub-region have joined with partners across the wider West Midlands to produce a West Midlands Regional Strategic Employment Sites Study to better understand the issue and to plan for growth accordingly; this piece of evidence was due summer 2023. However, no such evidence has been made public at this part of the issue and options consultation process. Accordingly, the assessment of future need has not been informed by all the relevant evidence and so remains incomplete and therefore is not a sound alternative to the standard method.
- 3.30 Given that the approach to defining the population assumptions is so convoluted and complicated, with so many assumptions used that have not been adequately explained (and the acknowledgement that these are likely to be incorrect) RPS contend that the analysis cannot be

relied upon as a robust and credible basis for a forward projection of population. Nevertheless, the HEDNA has applied the population projections as a basis for a set of household projections for the sub-region.

Household Projections

- 3.31 Paragraph 5.140-5.145 of the HEDNA briefly describes the process followed in converting population estimates (and projections) into household projections.
- 3.32 RPS notes that trend-based approach does utilise data on household representative rates (HRRs) and communal population drawn from the 2014-based subnational household projections (paragraph 5.142). This is to be welcomed. Nonetheless, paragraph 5.144 also states that, ‘... *the 2014-HRRs [household representative rates] have been adjusted to match the estimated number of households shown above with future (projected) years using the same incremental changes as in the base source...*’ (RPS emphasis). It is therefore unclear what formation rate have been used in the household projections, nor to what extent the rates have been altered.
- 3.33 Table 5.32 of the HEDNA provides a summary of the change in the number of households based on the ‘remodelled projection’. It shows a substantial reduction, nearly 400 households per annum, in the projected number of households compared to the 2014-based projections used in the standard method (3,511 v 3,894 hpa). The result is that the level of housing need determined for Coventry & Warwickshire would be reduced from 5,554 to 4,906, a reduction of 648 dwellings per annum.
- 3.34 The reduction in need would represent an approach that runs counter to the Government’s support for boosting the supply of housing set out in national policy, but could also build into the projections potential under-estimation of need within certain age groups due to issues with the 2021 Census count relating to the student component of the population, which has largely been ignored. The approach advocated in the HEDNA is unjustified and is not consistent with national policy.

Summary on the trend-based approach

- 3.35 As explained in the previous chapter, RPS considers there are no exceptional local circumstances that exist to justify setting aside the Government’s preferred ‘standard’ method for calculating housing need.
- 3.36 Whilst the alternative approach results in higher housing need in some areas, it will not meet the full needs of the HMA. This runs the risk of under-supply (and not a boost in supply) of housing, which could result in worsening affordability of housing and a reduction in the provision of affordable housing to meet the needs of those households on lower incomes. At a time of a cost of living crisis and other inflationary pressures on households, restricting the supply of housing will undoubtedly cause further hardship for many people seeking to access housing in the area.
- 3.37 RPS considers issues relating to the supply of housing in some more detail later in this report.

- 3.38 It is also the case that methodology used in the HEDNA is overly-complicated and is selective regarding those elements of the standard method it seeks to move away from. Similarly, as highlighted, there may well be issues with the number of people counted in the 2021 Census due to the timing of the count and the pandemic and how this may have influenced where people were living on Census day (Sunday 21 March 2021). This could have impacted on the number of people counted with certain age groups, notably 20-29 years (and possibly younger). This can only be clarified through further investigation by ONS. RPS does note that measures have already been taken to address methodological issues relating to student numbers, through the Higher Education Leavers Methodology (HELM), which was applied to the official population estimates from 2017 onwards. It is likely that potential under-estimation of move out of the area, notably Coventry, have been addressed and so is not a significant factor in determining population estimates after this date, and has been exaggerated in the HEDNA.
- 3.39 Furthermore, the analysis above (Table 3.1) illustrates that population projections are not 100% accurate and are largely driven by the assumptions that underpin them. The Standard Methodology set out in national policy and guidance is merely a tool that offers consistency on a national scale in order to achieve two key objectives; firstly, to ensure that there is a significant boost in the supply of homes; and secondly to ensure the right type of homes are built in the right locations.
- 3.40 On a broader subject, the PPG (2a-024) makes clear that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes. This is a particularly relevant consideration to certain areas of the CWHMA, notably Coventry, where recent delivery of affordable housing has fallen short of the need since the adoption of the current Local Plan.
- 3.41 In this context, RPS does not support the use of any alternative approach to the assessment of housing need in Coventry & Warwickshire, and the HEDNA should be based on the standard method preferred by Government and which remains their formal, preferred approach for assessing local housing need at this time.

4 URBAN CAPACITY ISSUES

Current anticipated supply 2021-2041

- 4.1 Table 6 of the IOD provides a summary of the housing land supply identified to meet the future housing requirement. The table is reproduced below.

Table 6: Supply as at 31st March 2023

Housing land supply	Number of Homes
Past net completions	3,818 (2021 /22 monitoring year)
	1,620 (2022 / 23 monitoring year)
Call for brownfield sites	1,200 (approx.)
Sites with planning permission (includes those under construction but not completed)	11,914
Local Plan allocations – remaining capacity	3,151
City Centre Area Action Plan Remaining Allocations	455
Windfall	3,000 (2026 onwards)*
Total	25,158**

- 4.2 A further break down of these numbers is provided in Table 2 of the Housing and Employment Land Availability Assessment (“HELAA”) 2023 issued alongside the IOD consultation.
- 4.3 The rest of this section provides some observations on the various categories comprising the future supply. The analysis draws on information set out in Appendix 1 of the HELAA, which shows a schedule of sites in the supply.

Past net completions to date (2021-2023)

- 4.4 Net completions to date total 5,438 dwellings between 2021 and 2023. For 2021/22, monitoring figures indicate that 2,621 ‘dwelling equivalents’ were Purpose Built Student Accommodation (PSBA). This represents a significant proportion of all new build properties (69%) in that year. In addition, of those non-PBSA completions during 2021/22 (1,233 dwellings) 54% were one and two-bedroom apartments, with the remainder comprising general family housing (i.e. 2+ bed houses). The breakdown of completions for 2022/23 has not been provided as part of the IOD consultation, but was significantly lower overall than the previous year.
- 4.5 Recent housing delivery indicates a prevalence for purpose built and smaller properties in Coventry. This is helping to meet the needs of specific groups in the city, but the provision of relatively fewer, larger homes risks undermining the supply of homes for other groups, for example families. It is essential that the plan review makes proper provision for all household groups, including families, when setting the housing requirement and addressing sources of supply.

Sites with planning permission

- 4.6 The anticipated supply from sites with extant permission currently totals 11,914 dwellings. This comprises sites with both detailed and outline permission as at end of March 2023.
- 4.7 RPS notes a significant proportion of this supply comprises ‘windfalls’, some 1,535 dwellings, all of which is anticipated as coming forward in years 1-5. The IOD includes an allowance of 200 dwellings per annum. If this is accepted, then RPS contends that in simple terms the delivery of those windfalls already in the system will take roughly five years to build out, because there is nothing preventing them coming forward in principle. RPS discusses the wider implications for the windfall allowance in this section further below.

Call for brownfield sites

- 4.8 The Council has included in the forecast supply a number of sites drawn from a ‘call for sites’ exercise carried out recently, totalling 1,200 dwellings (approximately).
- 4.9 No supporting evidence has been provided to demonstrate these sites are developable (6-10 years) during the plan period. RPS notes that a number of the sites identified appear to be in existing use, notably for employment. Similarly, it has not been demonstrated in either the IOD or the supporting evidence that the loss of employment on these sites is appropriate in policy terms or that they are available and could be viably developed at the point envisaged, in accordance with national policy⁷.
- 4.10 RPS has reservations regarding the developability of many of these sites without sufficient evidence to justify their inclusion in the forecast supply.

Local Plan Allocations – remaining capacity

- 4.11 The Council identifies 3,151 dwellings from existing site allocations with dwellings yet to be delivered at end of March 2023.
- 4.12 RPS notes the retention of Walsgrave Hill Farm (ref. H2:03) in the forecast supply, for 900 dwellings. The site is located on the boundary between Coventry and Rugby Borough. The site was initially progressed under the duty to cooperate as a cross-boundary matter because of its strategic nature and its relationship to the Green Belt in this location. Coventry City Council released their portion of the site from the Green Belt as part of the adopted Local Plan. However, Rugby decided to retain their portion of the site as Green Belt in their own recently adopted Local Plan. This means the original intentions for the wider site were not taken forward, and the site remains partly allocated in the Coventry Local Plan.
- 4.13 To date, no live planning application has been submitted seeking planning permission for residential development on the site. This is despite the plan originally being adopted in 2017. The

⁷ NPPF 2021, paragraph 68

Council provides no supporting evidence that justifies the retention of the site in the forecast supply as part of the Plan review. The future deliverability and developability of the site is therefore questionable at this point.

4.14 If this site is removed, it would reduce the forecast supply by 900 dwellings.

Windfall allowance

4.15 Table 6 of the IOD proposes an allowance for other sites that might come forward on land not specifically identified in the development plan, known as ‘windfall sites’ as defined in the NPPF⁸.

4.16 The IOD proposes an allowance of 3,000 dwellings. The windfall figure of 3,000 dwellings is based on an anticipated windfall supply of 200 dwellings per year (total 4,000 dwellings), with a deduction of 1,000 dwellings to avoid double counting of (a) the two monitoring years that have passed (2021/22 and 2022/23), and (b) the following three years (2023/24 to 2025/26), which are considered to have been accounted for in the list of extant windfall planning permissions.

4.17 Table 2 of the HELAA provides a breakdown of the overall windfall allowance and how this will be provided across the plan period. The table below shows this.

Table 4-1 Projected windfall delivery – Coventry to 2039

Status	Delivery forecast per five-year period			Total supply
	Years 1-5	Years 6-10	11+	
Windfalls (forecast)	400	1,000	1,600	3,000
Windfalls (with detailed PP)	1,535	0	0	1,535
Windfalls (with outline PP)	0	677	78	755

Source: HELAA 2023, Table 2

4.18 With regards to windfalls, paragraph 71 of the NPPF states inter alia:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends....” (RPS emphasis)

4.19 RPS has a number of concerns with the approach set out in the IOD and supporting documents.

4.20 Firstly, the adopted Local Plan included an allowance relating to ‘small windfall sites’. However, none of the published documentation provides any definition of what constitutes a windfall site for the purposes of the Plan review. This is a fundamental first step in determining the appropriate scope and level of windfall allowance to be taken forward and provides the basis for the evidence gathering relied upon as a basis for the allowance.

4.21 RPS contends there is no need to consider an allowance other than for small windfall sites, given the Council’s thorough investigation of potential site sources through the HELAA and the call for

⁸ NPPF 2021 Glossary

brownfield sites process, which have identified a considerable number of larger sites within the urban area.

- 4.22 Secondly, the proposed allowance of 3,000 dwellings is nearly ten times greater than the equivalent allowance set out in the adopted Local Plan (which allowed 350 dwellings⁹). However, no compelling evidence is provided to justify such a substantial increase over a similar plan period to the adopted period (20 years).
- 4.23 And thirdly, as can be seen in the table above, there is a considerable amount of overlap in the trajectory of windfall delivery across extant and forecast sources. The usual practice has been to restrict the allowance in the early years (usually years' 1 to 3 at least). In this case, the overlap extends well beyond the first three years and cover years 6-10. This presents a significant risk of double-counting over the short to medium term of the plan period. No evidence is provided to address this potential risk of double-counting.
- 4.24 Taken together, RPS contends that the windfall allowance is overstated and should only reflect potential supply from smaller sites. No compelling evidence provided to justify the allowance of 3,000 dwellings.
- 4.25 On this basis, the Council should revisit their analysis and their assumptions (whatever these are) in order to provide a future windfall allowance that is based on compelling evidence as part of the next iteration of the plan review.

Concluding remarks on supply

- 4.26 Based on the foregoing analysis, RPS contends that the supply-side provision of housing forecast by the Council is over-optimistic and is not suitably evidenced. This relates to concerns raised on elements of the supply from remaining site allocations and the windfall allowance.

⁹ Adopted Coventry Local Plan 2011-31, Table 4.1

5 CONCLUSIONS

5.1 This report has been drafted on behalf of the South Warwickshire Developer Consortium (“the Consortium”) to respond to the Issues and Options (“IOD”) Regulation 18 version of the Coventry Local Plan. The Forum are a consortium of housebuilders who operate in the Coventry and Warwickshire Area. For the purpose of this consultation, the Consortium consists of the following members:

- Taylor Wimpey Strategic Land;
- Miller Homes; and
- William Davis Homes.

5.2 It should be noted that some or all of the above organisations may be making their detailed submissions to the Regulation 18 Consultation. This response is not expected to replace those submissions, but sit alongside them, addressing matters specifically related to housing need and supply, both in Coventry and Warwickshire more broadly.

5.3 This report seeks to address the main findings and underlying assumptions presented in the Coventry & Warwickshire Housing & Employment Development Needs Assessment (“HEDNA”) used to inform the IOD 2021-2041 consultation, held during September and October 2023.

5.4 The executive summary highlights the main issues and conclusions drawn from the analysis. RPS recommends that the Council takes on board the matters raised in this report as part of refining the evidence as the Plan review moves forward.

General comments on exceptional local circumstances

5.5 Paragraph 1.5 of the HEDNA identifies the key requirements of the study brief, notably to consider overall housing need within the Study area ‘having regard to the standard method’. The result is an overall housing need projection that is lower than the standard method figure for the C&WHMA.

5.6 Measures seeking to reduce the level of housing growth across the HMA could have unforeseen and unintended consequences which risks undermining the future health of the local and sub-regional economy. This needs to be considered as part of the assessment process.

5.7 The importance or significance of the Census outputs should be seen in this wider context and should not be given undue or elevated status in the assessment process.

5.8 The economic baseline would suggest that recent economic performance in Coventry largely reflects the level of growth both regionally and nationally and which has, based on the analysis, seen relatively weaker growth compared to the wider sub-region. This does not highlight anything exceptional has occurred in Coventry, and also points to the need for measures to support and encourage more growth to help bolster the role of Coventry as the main economic centre in the sub-region.

- 5.9 The HEDNA shows that house price trends during 2010-2020 for the sub-region are broadly consistent with trends across the West Midlands and nationally; whilst growth rates to September 2020 (in Figure 4.2) within the sub-region show that Coventry has grown at a rate consistent with other authorities. Analysis of house price change in Coventry is not considered to represent evidence of anything exceptional in the data.

Lack of clear justification for exceptional local circumstances

- 5.10 The evidence on demographic and other housing-related factors set out in the HEDNA asserts that estimates of population in Coventry as having been over-estimated in the period since 2011. On this basis, the HEDNA claims that exceptional local circumstances exist to justify setting aside the standard method as a basis for calculating local housing need as part of the next iteration of plan-making for the Coventry & Warwickshire HMA authorities.
- 5.11 The analysis set out in this report disputes this assertion. RPS contends that exceptional local circumstances do not exist. Indeed, in the summary to their own analysis the HEDNA (paragraph 5.73) acknowledges that population growth in Coventry has not been exceptional, which RPS broadly agrees with (though some aspects of change, for example house prices, do show above average trends).

Demographic analysis

Establishing a base population estimate

- 5.12 The principal focus of a move to an alternative projection methodology in the HEDNA is to support alternative projections for Coventry. This approach has very little to do with justifying an alternative approach for the other constituent authorities in Coventry & Warwickshire.
- 5.13 The official mid-year population estimates (“MYEs”) published by ONS are not dissimilar to the latest population projections (2018-based) and represent higher figures than the Government’s preferred starting (2014-based projections). This also raises doubts that the MYEs are significantly different from other official statistics. RPS questions the overall robustness of the HEDNA as an alternative to the official population estimates for 2020 issued by ONS. This suggests that the official projections (2014-based) remain an appropriate starting point for assessing housing need.
- 5.14 The HEDNA uses the Census 2021 outputs as a starting point for the alternative projections. It must be assumed the Census 2021 are sufficiently robust for this exercise. However, as highlighted in the HEDNA (paragraph 5.92) this may not be the case due to the pandemic and where people were living at the time of the census count, notably amongst the student population, particularly where many students were working from home. Consequently, it is questionable whether the Census outputs should be used in any aspect of the forward planning exercise until they have been properly verified by ONS.

5.15 Given the potential for over-estimation of population in student-related age groups remains a matter under consideration by ONS, as highlighted earlier in this report, the use of the 2021 Census as a starting point for further work on alternative population estimates and projections for Coventry & Warwickshire HMA must be in question, at least until this matter has been investigated and resolved. This includes consideration of whether the 2021 Census has, in fact, undercounted a proportion of the population in Coventry and other areas in the HMA, for example due to factors relating to the pandemic.

The alternative ‘trend-based’ projections in Coventry and Warwickshire

5.16 The approach taken in the HEDNA to defining the population assumptions is so convoluted and complicated, with so many assumptions used that have not been adequately explained (and the acknowledgement that these are likely to be incorrect). RPS contend that the analysis cannot be relied upon as a robust and credible basis for a forward projection of population.

5.17 RPS considers there are no exceptional local circumstances that exist to justify setting aside the Government’s preferred ‘standard’ method for calculating housing need.

5.18 Whilst the alternative approach results in higher housing need in some areas, it will not meet the full needs of the HMA. This runs the risk of under-supply of housing, which could result in worsening affordability of housing and a reduction in the provision of affordable housing to meet the needs of those households on lower incomes. At a time of a cost of living crisis and other inflationary pressures on households, restricting the supply of housing will undoubtedly cause further hardship for many people seeking to access housing in the area.

5.19 It is also the case that methodology used in the HEDNA is overly-complicated and is selective regarding those elements of the standard method it seeks to move away from. Similarly, there may well be issues with the number of people counted in the 2021 Census due to the timing of the count and the pandemic and how this may have influenced where people were living on Census day (Sunday 21 March 2021). This could have impacted on the number of people counted with certain age groups, notably 20-29 years (and possibly younger). This can only be clarified through further investigation by ONS. RPS suggests measures have already been taken to address methodological issues relating to student numbers, through the Higher Education Leavers Methodology (HELM), which was applied to the official population estimates from 2017 onwards. It is likely that potential under-estimation of move out of the area, notably Coventry, have been addressed and so is not a significant factor in determining population estimates after this date, and has been exaggerated in the HEDNA.

5.20 In this context, RPS does not support the use of any alternative approach to the assessment of housing need in Coventry & Warwickshire, and the HEDNA should be based on the standard method preferred by Government and which remains their formal, preferred approach for assessing local housing need at this time.

Land supply matters

- 5.21 RPS provides some observations on the various categories comprising the future supply. The analysis draws on information set out in Appendix 1 of the Housing and Employment Land Availability Assessment, which shows a schedules of sites in the supply.
- 5.22 RPS contend that the supply-side provision of housing forecast by the Council is over-optimistic and is not suitably evidenced. This relates to concerns raised on elements of the supply from remaining site allocations and the windfall allowance.

Appendix 2

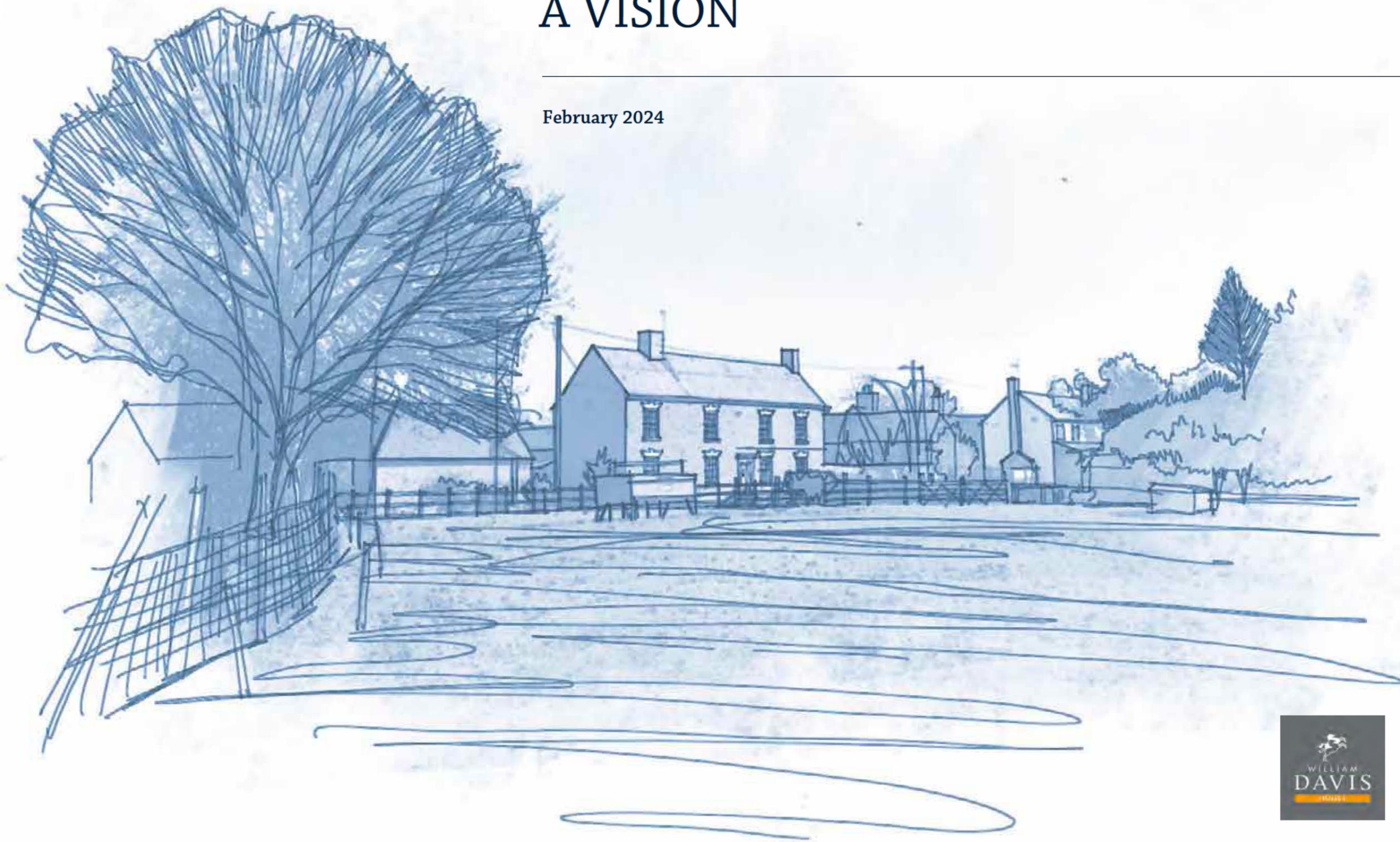
Land South of Rugby Road – Brinklow: A Vision, prepared by tor&co dated February 2024

Land South of Rugby Road

Brinklow

A VISION

February 2024



tor
&CO



© tor&co 2023. All rights reserved.
No part of this document may be reproduced in any form or stored in a retrieval system without the prior written consent of the copyright holder.

All figures (unless otherwise stated) © tor&co 2023.

©Crown Copyright and database rights 2022 OS Licence no. AC0000849896
Contains OS data © Crown copyright and database right 2022. Licensed under the Open Government Licence v3.0.
Contains public sector information licensed under the Open Government Licence v3.0. Published by The Environment Agency

Aerial imagery © Getmapping plc

Land South of Rugby Road

Brinklow

A VISION

CONTENTS

1. INTRODUCTION
2. SITE CONTEXT
3. THE SITE
4. LANDSCAPE CONTEXT
5. THE STRATEGIC CONTEXT FOR THE PROPOSED DEVELOPMENT
6. WHY THIS SITE?
7. THE VISION
8. WILLIAM DAVIS HOMES
9. SUMMARY

1

INTRODUCTION

William Davis Homes controls 5.2 hectares of land to the south of Rugby Road, Brinklow. The site has the potential to accommodate around 100 dwellings, public open space and additional landscape planting and offers an exciting opportunity to establish a new neighbourhood within easy reach of the wide range of facilities that are available nearby.

1.1 This vision document has been prepared by tor&co on behalf of William Davis Homes to explain what the site's development could potentially achieve and how it could contribute towards the sustainable growth of the community of Brinklow.

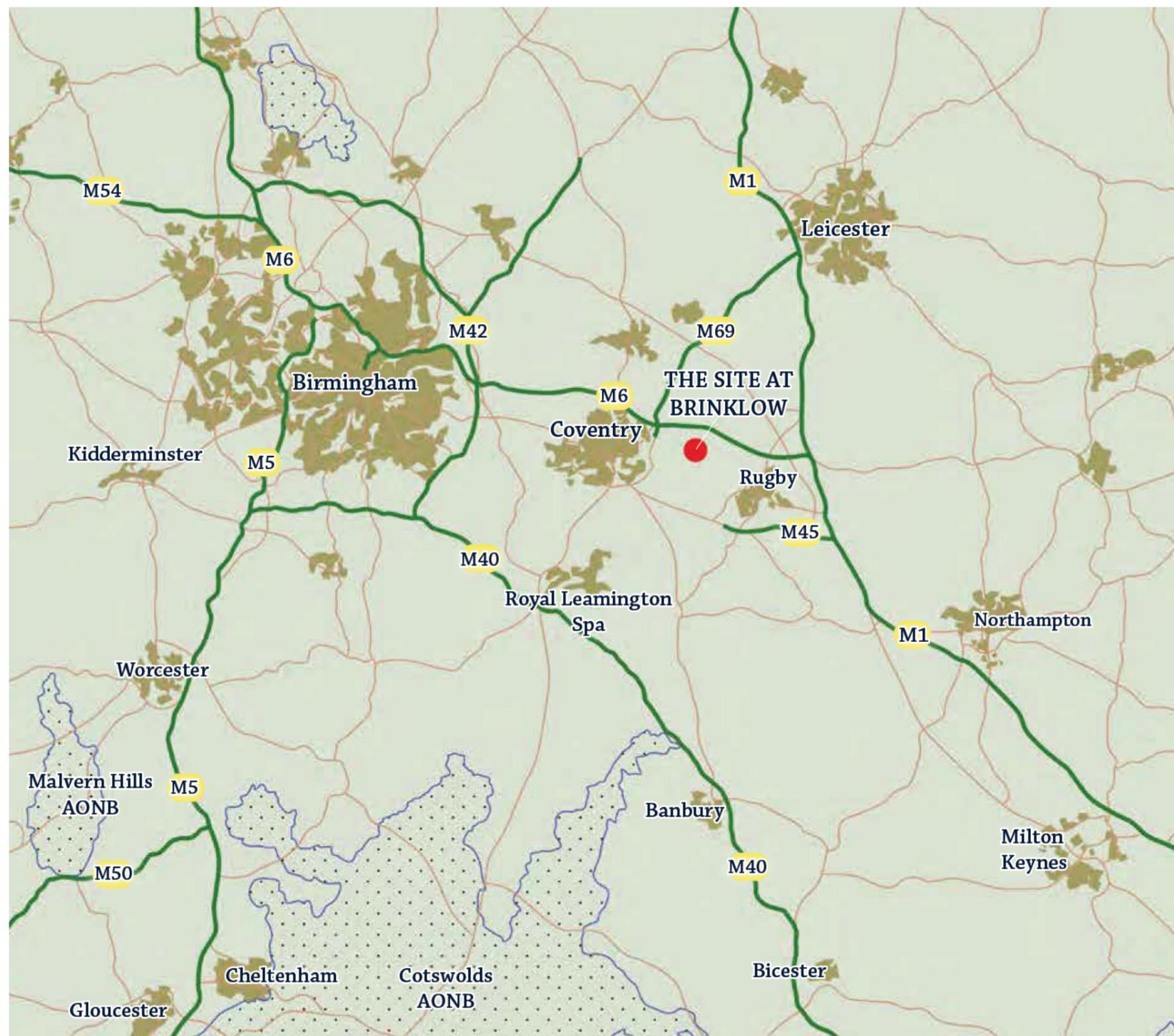


2

SITE CONTEXT

The village of Brinklow and Civil Parish is located in Rugby District in eastern Warwickshire, located approximately equidistant between the town of Rugby (8km to the east) and city of Coventry (9km to the west). Dating from the Norman Conquest, the village extends across the former Roman road of Fosse Way, which historically linked Exeter to Lincoln. Brinklow had a population of 1,101 at the 2011 Census, with an estimated population of 1,180 in 2020.

2.1 Positioned on the Coventry Way (a 40-mile public footpath that circumnavigates the city of Coventry) Brinklow is located in an accessible location that reflects its historically strategic position on the Fosse Way. Consequently, the village benefits from ease of access to both Rugby and Coventry with hourly buses between the two settlements (service no. 85) from bus stops located 150m to the north-west of the site on Coventry Road. The bus service allows access to a wider service base and employment opportunities.



Site location

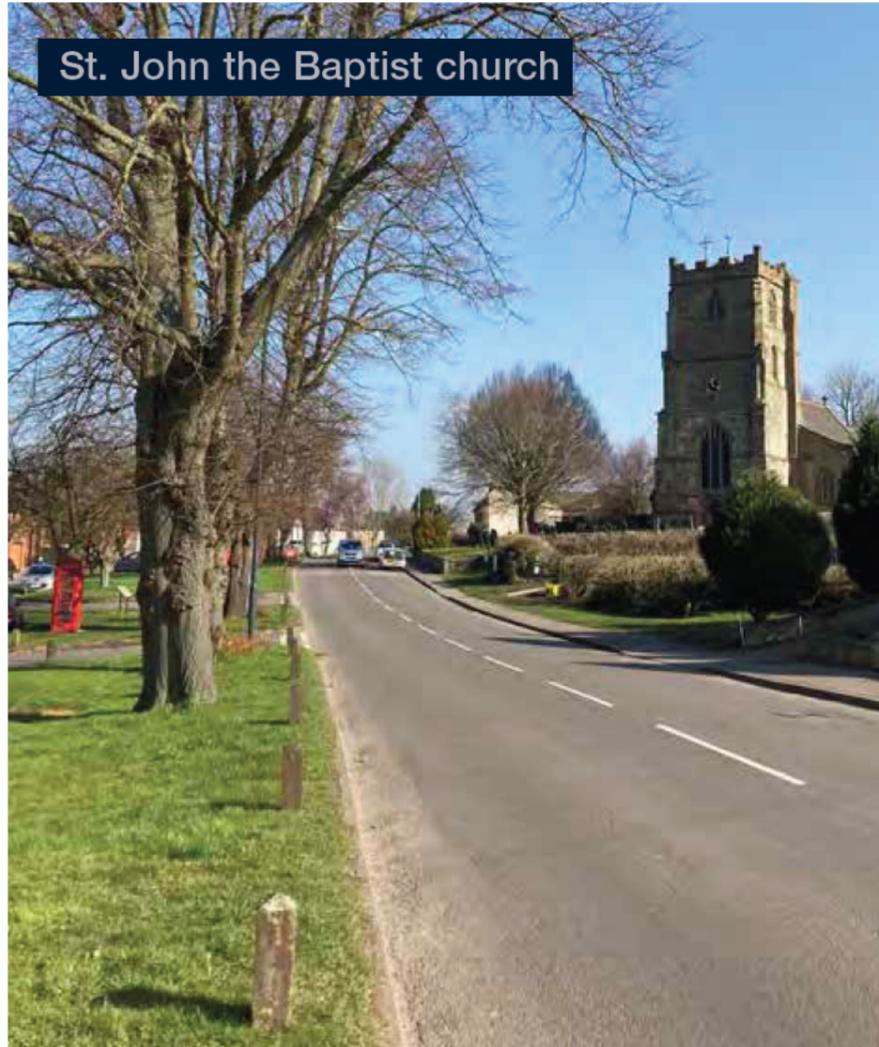
Properties in The Crescent facing old medieval square



Broad Street



St. John the Baptist church



The war memorial



Broad Street



Heath Lane



B4455 Rugby Road and Home Farm

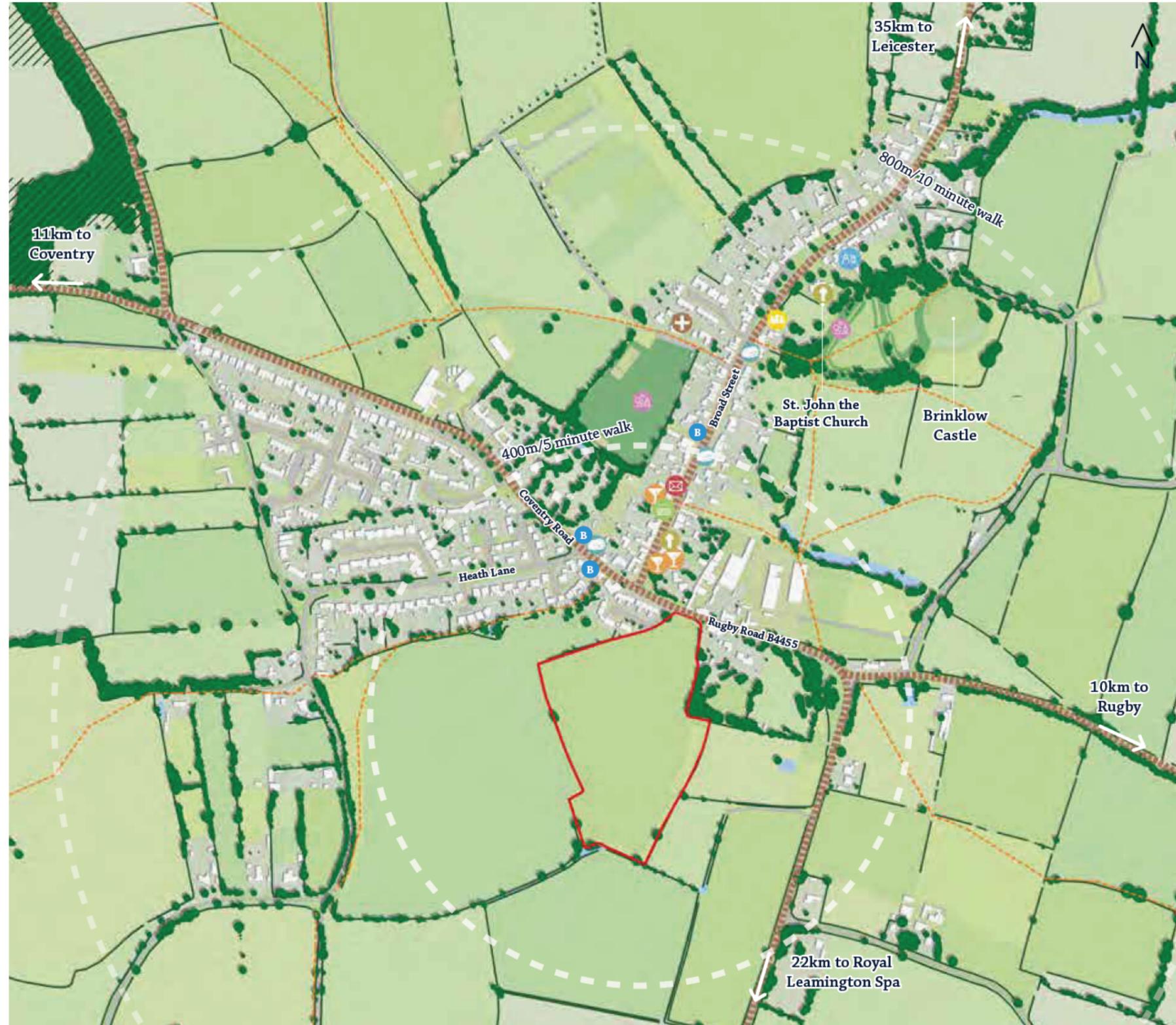


BRINKLOW VILLAGE

The settlement is centred around England's second largest surviving medieval market square and benefits from a range of amenities and services based out of the village centre. These include a surgery, community church hall, post office, recreation ground and multiple public houses.

2.2 These services and amenities are located within walking distance of the site and will not require the use of a private car. The bus stops located on Coventry Road, 150m west of the site also provide public transport options to access service and employment opportunities at Rugby and Coventry.

-  Site boundary
-  Roads
-  PRoW
-  Ancient woodland
-  School (single year)
-  Place of worship
-  Pub
-  Post office
-  Restaurant
-  Retail
-  Surgery
-  Community hall
-  Public green space
-  Bus stop



Brinklow Village

3

THE SITE

The land being promoted by William Davis Homes comprises 5.2 hectares of grade 3b agricultural land located to the south of Rugby Road on the southern edge of Brinklow. Comprising of a single field, the site lies opposite the Grade II listed Home Farm and is adjacent to mid 20th-century housing in Brays Close to the west. Vehicular access is obtained directly from Rugby Road.

3.1 Hedgerows form the site's western boundary whilst landscape planting extends existing tree belts that comprise the site's eastern limits. To the north-east, the site abuts residential housing that fronts onto Rugby Road.

3.2 Topographically, the site has no notable ground height changes, although there is a gentle slope across the site from the north down towards the southern boundary.



The site (refer to page 10 for site photos)

SITE PHOTOS



View looking west toward neighbouring homes. Two prominent mature trees form a focal point. Existing homes to the west of the site in Brays Close are visible



View looking north towards attractive red brick building opposite the existing site access. Although not listed, this has been identified as a building of importance to the Brinklow conservation area, which has its boundary on the northern edge of the site



Zoomed view looking north towards Rugby Road. Brinklow Castle motte and bailey is glimpsed in the distance



View looking south west towards wider countryside. The general feeling within the southern part of the site is a transition from semi-rural to rural



View looking north towards Rugby Road. Seedling plantations are visible on eastern boundary, and parts of the southern boundary of the site



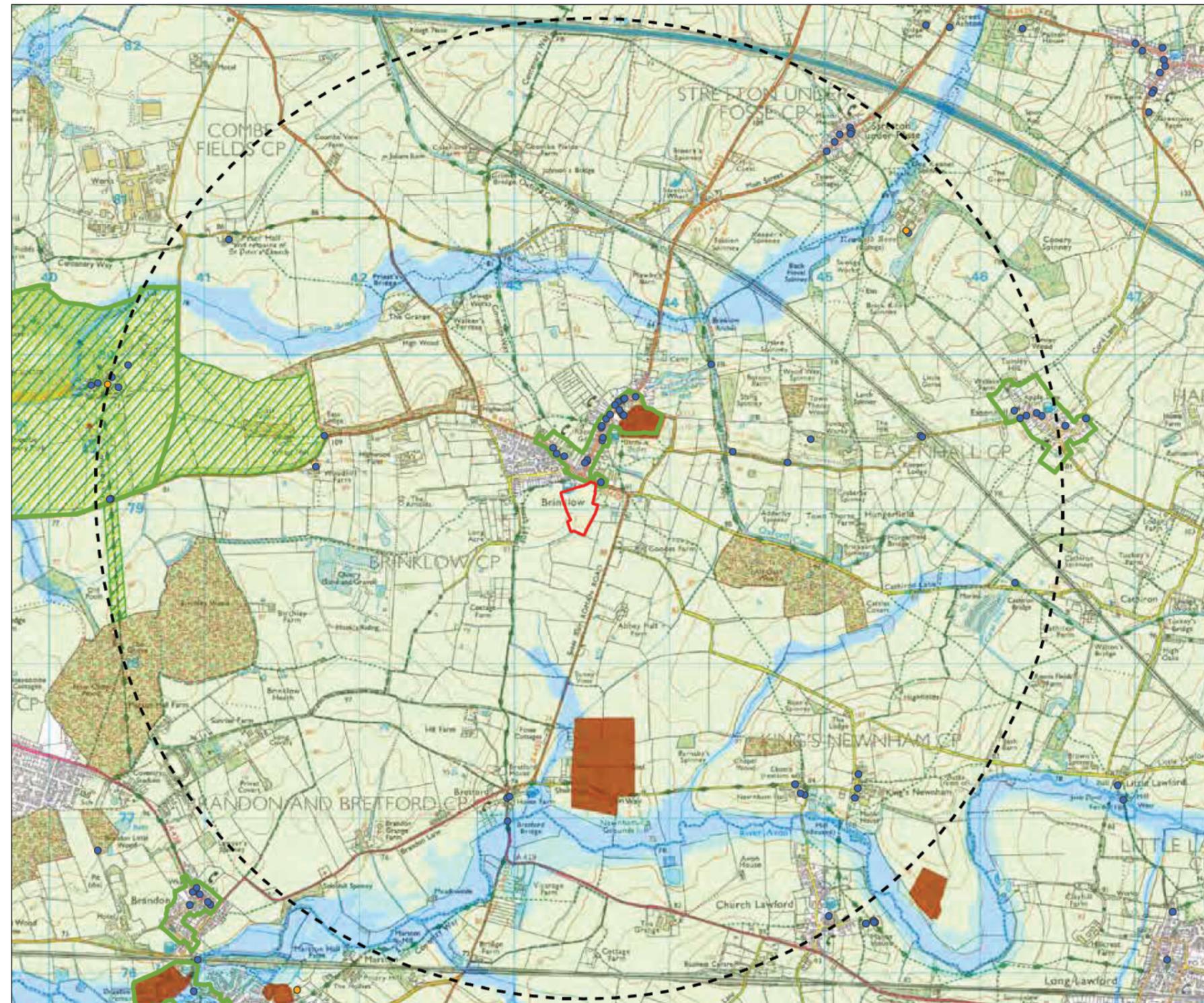
View looking east from junction of Broad Street and Coventry Road. A triangular village green includes a war memorial and an ornamental village sign. This green space is visible from the site, which can be seen on the right hand side of the image

DESIGNATIONS

No public rights of way cross the site and the site does not fall within a floodplain. A small area of medium to high surface water flood risk does cover a southern portion of the site. This area of land is associated with a field drain that forms the site's southern boundary.

3.3 The site is not constrained by other specific landscape, heritage or archaeological designations.

-  Site boundary
-  3km study area
- Listed buildings
-  Grade II
-  Grade II*
-  Scheduled monuments
-  Registered parks and gardens
-  Conservation areas
-  Ancient woodland
-  Site of Special Scientific Interest
-  Flood Zone 2
-  Flood Zone 3
-  Green belt



Designations

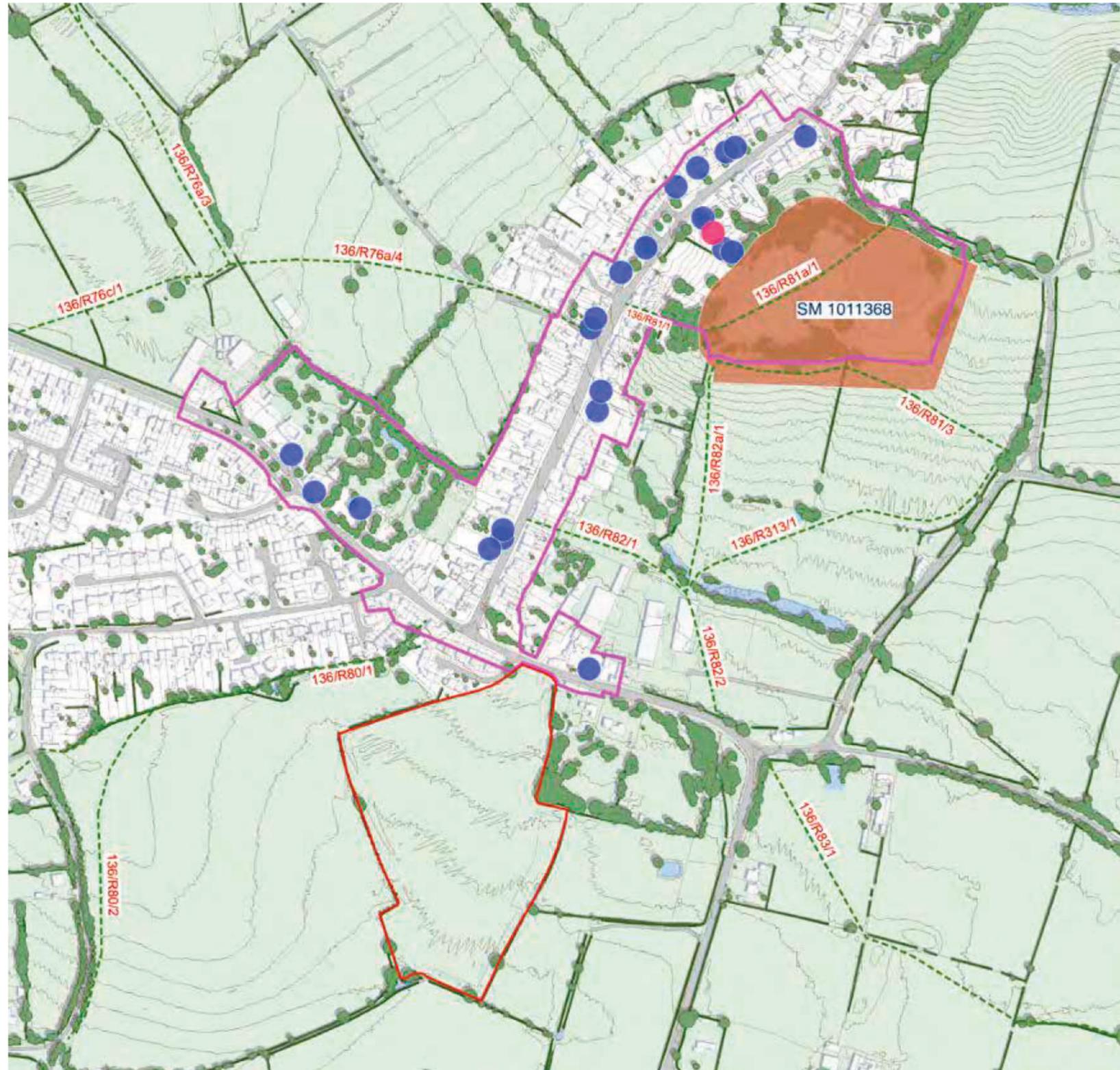
CONSTRAINTS

3.4 The site's principal planning and environmental constraint is its location within the West Midlands Metropolitan Green Belt. However, the National Planning Policy Framework (NPPF) allows local planning authorities to amend green belt boundaries where exceptional circumstances exist and where the new green belt boundary can follow physical features that are readily recognisable and likely to be permanent.

3.5 The other constraint that directly affects the site is the Brinklow Conservation Area, part of which encompasses the site's frontage with Rugby Road and which connects a group of cottages opposite West Farm with 20th century housing in Brays Close. In accordance with national planning policy, any development at this site would need to respect the setting of the conservation area.

3.6 Approximately 350m to the north of the site is Brinklow Castle, a Norman Motte and Bailey structure which is a Scheduled Monument. The castle also falls within the Brinklow Conservation Area and by virtue of its prominence within the local area, is also a heritage asset where its setting needs to be considered and respected as part of any new development.

- | | |
|---|--|
|  Site boundary 5.2ha |  Public right of way |
|  Grade II listed building |  1m contour |
|  Grade II* listed building |  Ridge/furrow |
|  Scheduled monument |  Existing vegetation |
|  Conservation area |  Pond/surface water feature |
| |  Green belt |



Constraints

HERITAGE

Introduction

3.7 The potential for effects on cultural heritage will be a key issue for consideration as part of the formulation of a masterplan for the development of the site.

3.8 The site is located just off the B4455, which here follows the course of the Fosse Way, the Roman road that ran between Exeter and Lincoln, and to the south of the centre of the village that was originally laid out in two phases of medieval planning. The first phase at The Crescent to the north related to the construction of the motte and bailey castle soon after the Norman Conquest, and the later area at The Broad to the south was laid out in c.1220, as part of the establishment of a planned borough and market. The town failed to develop and by the 16th century had lost urban status, reverting to an agricultural village, which has preserved the medieval layout. Brinklow is recognised as one of the best surviving examples of a small medieval planned town. A large proportion of the buildings in the village are listed for their national interest (the castle motte and bailey is a scheduled monument) and are covered by a conservation area designation.

The history of Brinklow

3.9 The brief outline of the history of the village given here is based on the national designation record and the information in the Warwickshire Historic Environment Register (HER) as well as the available online sources. There is an extensive academic literature on the medieval village

and a number of detailed characterisation reports have been produced in addition to the published conservation area appraisal. A full review of these and other sources would be part of future work, in the form of a detailed desk-based heritage assessment.

3.10 There may have been an early settlement focus in the area; based on the placename evidence the spur at the edge of the east to west ridge that is now occupied by the Norman castle motte is identified as a possible location of a Bronze Age barrow. The alignment of the Roman road may also have related to a pre-existing feature.

3.11 The form of the present settlement pattern based on the nucleated village relates to the establishment of the castle, which was probably constructed as part of the pacification and creation of new administration immediately after the Norman Conquest. The motte and bailey of the timber castle is set on the high point alongside the Fosse Way (which was diverted to the west) allowing control of the important route. The existing settlement pattern was amended and the new village was established close to the castle, the road layout at The Crescent following the curve of the outer bailey. Brinklow was not independently assessed at the time of the Domesday survey 1087, forming part of the neighbouring manor of Smite.

3.12 A new phase of planned development occurred in the early 13th century, a period of the establishment of new towns across the country. By this time the castle itself was out of use. The right



Village sign illustrating the history of Brinklow, located on the green on Broad Street, next to the war memorial

to hold a market was granted in 1218 and the existing settlement was replanned, with the line of long curved holdings around the market at The Crescent extended south to The Broad, and a system of formal burgage tenure was established. The earliest fabric of the Church of St. John the Baptist also dates to this to this period, though it was largely rebuilt in the 15th century. The medieval layout made use of a number of earlier east to west routes; one forming the current route of Rugby Road and Coventry Road at the south end of the village, and a number of smaller routes including at Barr Lane, and Butcher's Row, extending across the surrounding agricultural land.

3.13 Possibly because of the proximity of the important centre at Coventry, the medieval town did not develop further and Brinklow had lost urban status by the end of the 15th century, the last references to burgage tenure occurring in 1473. This early decline has preserved the two phases of medieval planning on the single north to south aligned street, in the width of the street as laid out for the markets and the curving green to the north and the patterns of urban plots and subdivisions, as well as the alignments of the areas of medieval crofts to the north. The outline of the former open fields remains legible in the areas of ridge and furrow cultivation earthworks visible around the village. The most extensive is the large area to the

south and west of the castle within the circuit of Ell Lane, which includes a range of other earthworks, field divisions and the alignments of the older routes. Other areas are to the south and west of the present village where they have not been ploughed out, including across the site area.

3.14 The later development of the village has preserved a number of the buildings of 16th and 17th century date, though there was extensive rebuilding in the 18th and early 19th centuries, which largely retained the patterns of the plots with narrow frontages to the street and long plots beyond. Most are of modest scale, though there are examples of some higher status houses. The parish was enclosed in 1742. Three of the main post-enclosure farmsteads are on the road to the south of the village centre, at West Farm, Home Farm and Brierley Farm to the west. There was some industrial development, and for a period from 1790 the Oxford canal ran through the village, crossing the main street twice on a long loop, before a more direct route was created in the 1830s.

3.15 Some ribbon development had occurred to the west of the village along Coventry Road by the 1930s and the post-war and more recent housing development has continued to be focused in this area, in the triangle defined by Green Lane and Heath Lane.



Brinklow 1903



Brinklow 1950



Brinklow 2001

The key heritage issues

3.16 The heritage issues for any development of the site relate to the archaeological interest of the site itself, the potential for harm to its value as part of the setting of the south edge of the conservation area and of the farms on Rugby Road, and any change to the relationship to the motte and bailey castle as the monument that dominates the village, particularly in its important visual connections to the Fosse Way.

3.17 The earthworks of pre-enclosure cultivation, in patterns of ridge and furrow with headlands between, cover the whole of the site. The survival of these is a characteristic of several areas around the village. The HER records no previous finds within the site area and its archaeological potential remains unknown.

3.18 The frontage of the site on Rugby Road is part of the Brinklow conservation area designation, linking the group of cottages opposite West Farm to the south of Rugby Road and the mid-20th century housing area at Brays Close (the latter is of no interest in itself, but is important as the terminal feature in the views down The Broad). This part of the designation is distinct from the core of the medieval planned town, and includes several of the main farmsteads on the edge; the farmhouse and yards at Home Farm, the grade II listed cottages at nos 5-7 Rugby Road, West Farm and the cottages on the south side of the road. Both the farmhouse and the buildings around the yard at Home Farm are identified as important unlisted buildings in the

conservation area, as is West Farm, and the continued presence of the farming operation and integration into the village edge is of value to the character of this part of the conservation area. The long distance view south across the site is not identified as a view of particular value in the adopted character appraisal, but allows the continued connection to the rural setting and the landholding of one of the main farms. The existing planting on the site edges will reduce these views over time as it comes to maturity.

3.19 The motte and bailey castle is closely integrated into the linear village street, in close association with the church (which may have originated as a chapel for the castle). Aside from the view of the rising slopes as seen from the green at The Crescent and alongside the church there are few other public views of the motte from within the centre of the village. The earthwork is a landmark feature of views

across a wider area, reflecting the military and administrative function; the most important being those along the Fosse Way in both directions but experienced most clearly to the south. Views outwards from the monument itself are afforded across a wide swathe of land to the south and along the straight line of the Fosse Way, and across the closer functional and historic setting of the adjacent areas of fields, with extensive related earthworks and ridge and furrow, enclosed by the line of Ell Lane. The scenic value of the motte is clear only from close locations where the form can be seen, again mainly from Ell Lane. (There is potential for future change to views of and from the monument because of the effect of the surrounding scrub around the earthworks in reducing views. Any future management or clearance, particularly on the south and south west edge of the baileys, could open up additional high level views across the village and beyond the present built extent.)

3.20 The site area forms part of the area of open fields in the approach to Brinklow from the south along the Fosse Way, offset from the main view corridor looking north. There are partial views of the motte from within the site, restricted to the south western corner and towards Heath Lane, though much of its form and the earthworks of the baileys are obscured by trees around the monument and along boundaries of properties on the east side of the main street. Similarly, the church tower is obscured by woodland in views towards the village from within the site area. In views outwards from the top of the motte the site is visible beyond the roofs of the farms on Rugby Road, marked by the distinctive form of the red brick gable ends and chimneys of Home Farmhouse.



Information board illustrating how Brinklow Castle looked in the 12th century



The remaining motte of Brinklow Castle

4

LANDSCAPE CONTEXT

LANDSCAPE CHARACTER

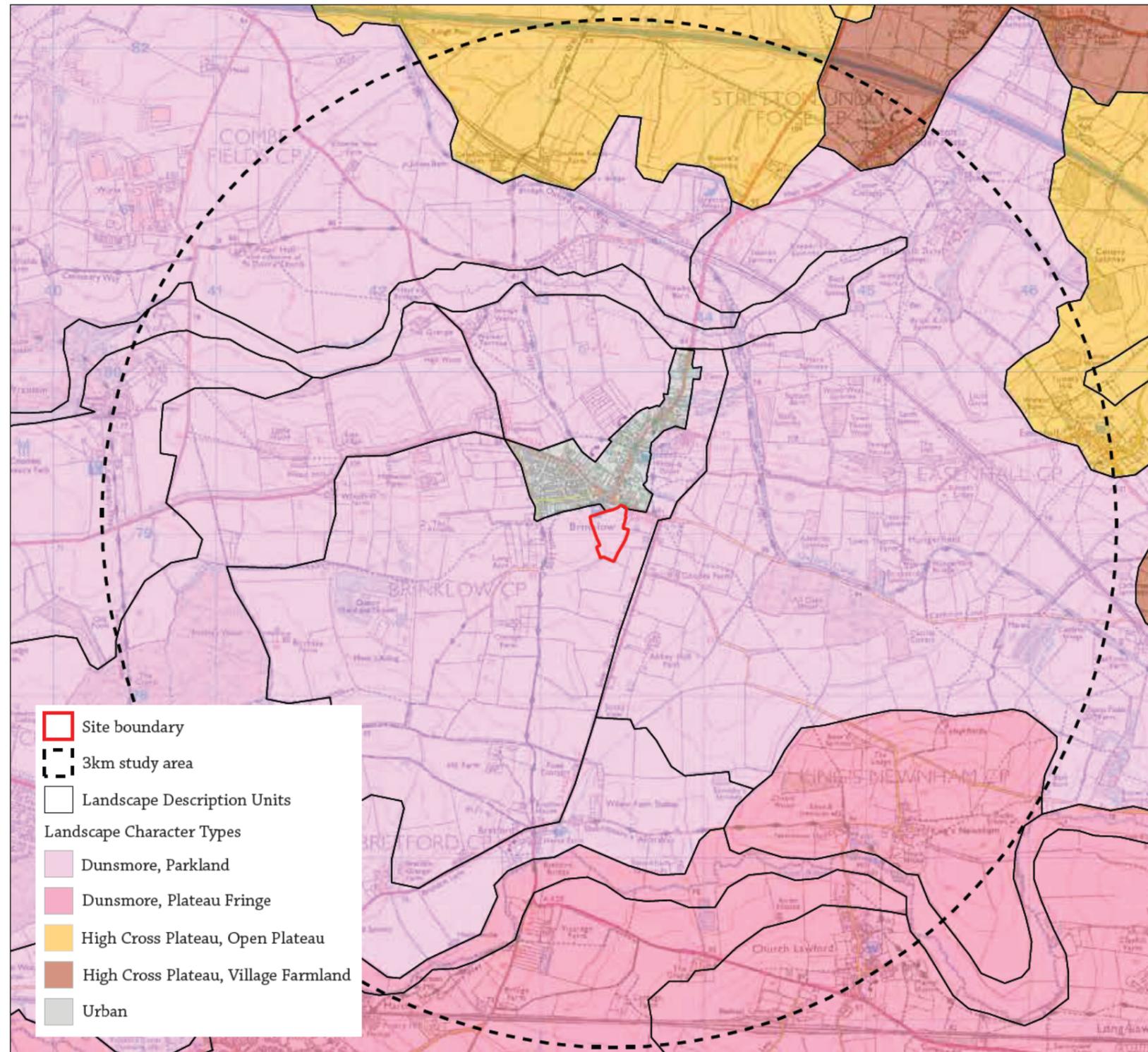
4.1 To understand the landscape setting and character of Brinklow there are a number of key documents which have been published and reviewed to assist in developing the vision for the site. The following paragraphs below provide a summary of those key landscape characteristics which are considered to be relevant to the site and its contribution to the existing local landscape character.

Warwickshire Landscape Guidelines (1993)

4.2 The Warwickshire Landscape Guidelines (WLG) defines the site and surrounding area as forming part of the Dunsmore Parkland landscape character type within the wider Dunsmore regional landscape character area. The general character of the Dunsmore Parklands is described in the study as “an enclosed, gently rolling estate landscape with a strongly wooded character defined by woodland edges, parkland and belts of trees” and its key features include middle distance views enclosed by woodland edges; belts of mature trees associated with estate lands; mature parkland with large country houses and mature hedgerow and roadside oaks.

4.3 The study notes that the St. John the Baptist church and adjoining motte are especially prominent features within the village of Brinklow. In the landscape around the village, the smaller hedged fields with a more intimate pastoral character are considered a distinctive feature. Beyond the fields, the study notes that the settlement consists of scattered farmsteads, large country houses and groups of estate cottages.

4.4 Within the Dunsmore Parkland character area, the study concludes that hedgerow and woodland planting and management are highlighted as a high priority.



Landscape character

Landscape Assessment of the Borough of Rugby – Sensitivity and condition study (prepared on behalf of Warwickshire County Council, 2006)

4.5 This study builds on the WLG findings, and focuses on the issue of landscape sensitivity within the Borough of Rugby.

4.6 In summary, the study assesses the Dunsmore Parklands character area (which includes the site and wider landscape around Brinklow), as being of ‘moderate’ fragility, ‘moderate’ to ‘low’ visibility (depending on level of tree cover) and of ‘moderate’ overall landscape sensitivity. The condition of the landscape is considered to be generally in decline.

Brinklow Site Allocations Development Pack (prepared by Rugby Borough Council, 2016)

4.7 This document utilises the work undertaken as part of the two previous studies discussed above. It notes that the site (site ref: S16043, 2016 SHLAA submissions) *“comprises small to medium scale pastoral farmland with ridge and furrow. The zone relates to other small pockets of pasture around the settlement edge and functions as a transition between settlement and wider farmland. These smaller hedged fields are a special feature of the landscape around Brinklow. There are also key interrupted views of Brinklow Castle from the Fosse Way. Due to the small scale fields of pasture and important views to Brinklow Castle this zone is inappropriate for development. Therefore the site is inappropriate for development”*. The site is a single field within a larger assessed site adjacent to the existing settlement edge. The smaller fields immediately adjacent to Fosse Way will be unaffected by the proposal, therefore reducing the potential effects on the views towards Brinklow Castle from Fosse Way

4.8 The report concludes that the *“fields within the sites are open in nature and free from development. There are also no boundaries present that would help to prevent encroachment of the wider countryside in the Green Belt”*. The eastern and south eastern boundaries of the site have been planted with a belt of mix of native woodland species including oak, alder, red alder, wild cherry, rowan, pine and spruce between approximately 10 m and 25 m wide, which will help filter and screen views towards the site.

Landscape Sensitivity Study for Binley Woods, Brinklow, Long Lawford, Ryton-on-Dunsmore, Stretton-on-Dunsmore, Wolston & Wolvey (prepared on behalf of Rugby Borough Council, 2016)

4.9 The site forms part of the larger landscape unit identified as zone BK_13. The site consists of the single larger field to the west, close to the existing southern settlement edge of Brinklow.

4.10 The report concludes that the landscape around Brinklow is *“very rural in character with a strong surviving small scale pastoral field pattern around the settlement edge that is a special feature of the landscape around Brinklow and often has strong historical associations. For example the small scale field pattern with extensive ridge and furrow connected with Brinklow Castle. The castle is a good example of a motte and bailey construction and a Scheduled Ancient Monument. The surrounding field pattern also includes a medium scale, open to farmed landscape on gently undulating ground. There are few wooded areas around the settlement which comprise the Oxford Canal corridor and the trees immediately adjacent to the motte and bailey (both potential Local Wildlife Sites) and the ghost of an ancient woodland block, High Wood (a Local Wildlife Site). Field boundaries are mostly hedgerows which range from intact to trimmed and gappy. Hedgerow*

trees are often scattered to insignificant and of mixed age.”

4.11 Within the site description, the report notes that the larger BK13 zone functions as a transition between settlement and wider farmland and that the smaller hedged fields are a special feature of the landscape around Brinklow (ref. Warwickshire Landscapes Guidelines for Dunsmore). Dense hedge trees and mature roadside trees contrasts with some gappy hedgerows with limited hedgerow trees creating a varied degree of enclosure across the larger zone. Views towards the settlement edge are further screened by vegetation along the garden boundaries. As you travel north along Fosse Way on approach to the village there are uninterrupted views of Brinklow Castle.

4.12 In summary, the report grades the zone as highly sensitivity to housing/commercial development and states that *“due to the small scale fields of pasture and important views to Brinklow Castle this zone is inappropriate for development”*. Other landscape characteristics of note include medium intervisibility, medium tranquillity rating (effected by traffic noise and settlement edge), the properties on Brays Close are visually prominent and create a hard edge due to the lack of a hedgerow field boundary and a stream course also provides a link to the wider area.

Brinklow Conservation Area character appraisal (prepared by Rugby Borough Council)

4.13 Within the Brinklow conservation area character appraisal, the war memorial, to the south of the village on the corner of Coventry Road and Broad Street, is highlighted as an important green space, with a key view of this space from the site.

4.14 The appraisal describes the landscape setting, green and open spaces and important trees and notes that the approaches to the

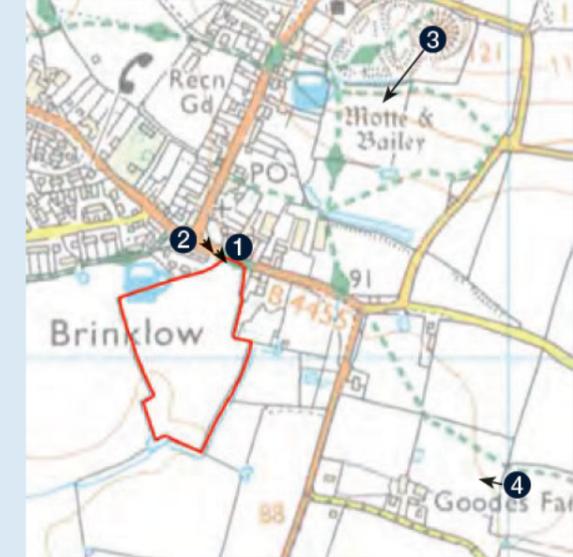
village from north, east and west are all through the rural landscape. Once within the village, only glimpses are generally possible of the surroundings. The rural approaches into the village include the archaeology of the motte and bailey castle.

Visual analysis

4.15 Views of the site are limited to immediately south of the site, along the northern section of Fosse Way until visibility is obscured by mature roadside trees, an isolated view from Rugby Road (conservation area), beyond which there is no intervisibility between the historic core of Brinklow and from a public right of way along the village’s southern settlement boundary. In summary, whilst the proposal will introduce new residential development within the landscape, it will be seen within the context of the southern built form of Brinklow and will not be uncharacteristic of the receiving modern settlement edge. The existing woodland planting within the site will in time, largely filter views of the proposal from the east and south. There is no intervisibility between the site and the historic core of Brinklow and the proposal is not expected to influence the rural approaches to the village for the north, east and west. There is a degree of both physical and visual separation between the site and the motte and bailey and the proposal is not expected to influence the scenic value and setting of this monument. A more detailed analysis of the visual relationship between the site and the surrounding landscape is described further in the site objectives and opportunities.

4.16 To assist with understanding the visual context on the site with the surrounding landscape, selected views have been included on pages 18 and 19.

LANDSCAPE VIEWS OF THE SITE





5. View from Fosse Way from the south



6. View from PRow west of the site



7. View from PRow west of the site



8. View from PRow south of the site



9. View from PRow south of the site



KEY LANDSCAPE OBJECTIVES AND OPPORTUNITIES

Notwithstanding the previous studies and documents prepared, the site (smaller than those site's previously considered), has the potential to bring forward development through developing a strong landscape approach which responds the existing landscape character and village setting. The key issues raised have been defined into five key landscape objectives and opportunities, as set out below and in the diagram on page 21.

OBJECTIVE 1 – To maintain and respond to the village character – The core of the special historic and architectural interest of the village is focused on the distinctive linear form along Broad Street, to the north of the site. This has a strong sense of enclosure with limited views out to the wider countryside. The site does not have a direct relationship/intervisibility to the historic core of the village. The village's conservation area includes the frontage of the site on Rugby Road, the character of which is distinctly different to the village core, with the presence of a farmhouse and yard.

OPPORTUNITY 1 - As a design response to the site's proximity to the conservation area, creating an appropriate set back will provide the opportunity to create an area of open space that maintains a green approach into the village, whilst helping to signify the group of trees on the corner of Brays Close as an important village feature. It will also maintain a view towards the war memorial from the site and a maintain a 'green setting' in the view from the memorial towards the site.

OBJECTIVE 2 - Respond to settlement edge – The modern 20th century extension along Brays Close and Heath Lane is a notable feature from views in the surrounding landscape. The southern settlement boundary is weak and is defined by rear garden boundaries and vegetation. The three storey properties in Poppy Close are prominent in the views towards the settlement edge.

OPPORTUNITY 2- The site has the opportunity to redefine part of this settlement edge by creating a new distinctive built character by minimising the scale of the buildings and articulating the built form in response to the farming and rural setting. Creating a large area of open space to the south of the built form provides an opportunity to create a new 'soft' settlement edge.

OBJECTIVE 3 – To maintain and respond to the approach from Fosse Way – When approaching the village along Fosse Way, the hedgerows in the landscape are generally low and gappy with some hedgerow trees. To the west of Fosse Way, the fields are generally medium sized and largely arable with pockets of smaller intimate pastoral fields mainly visible to the east. There is a distinctive cluster of trees either side of Fosse Way just as you enter the village. Fosse Way gently undulates and therefore glimpsed and filtered views towards the site vary. Whilst the existing vegetation is intact in places within the wider landscape to the south, it still creates a layered landscape structure which in summer is likely to reduce the extent of the visibility of the site. Whilst the site is currently pastoral land, its perception as such is not clearly distinguishable from the wider landscape due to the low-lying topography. The remaining pockets of arable farmland as described above, which are considered to be a 'special' feature, will be unaffected by the proposal. There are glimpsed uninterrupted views of the eastern side of the motte as you travel north towards the village. The immediate

setting of the motte and bailey is seen within a wooded setting. The site is offset from the main view corridor along from Fosse Way, positioned alongside the southern settlement edge of Brinklow. The agricultural fields between the site and Fosse Way, in combination with the wider rural setting to the south of the site will continue to maintain an uninterrupted view to the motte.

OPPORTUNITY 3 - The existing woodland planting along the eastern and south eastern boundaries within the site will over time enhance the strong treed setting as you approach the village along Fosse Way. The planting builds upon a key Dunsmore Parkland landscape characteristic and management strategy, to prioritise woodland planting. Providing an area of open space within the southern extents of the site will create a transitional zone between the settlement and the wider countryside and help to minimise impact on the visual character of Fosse Way.

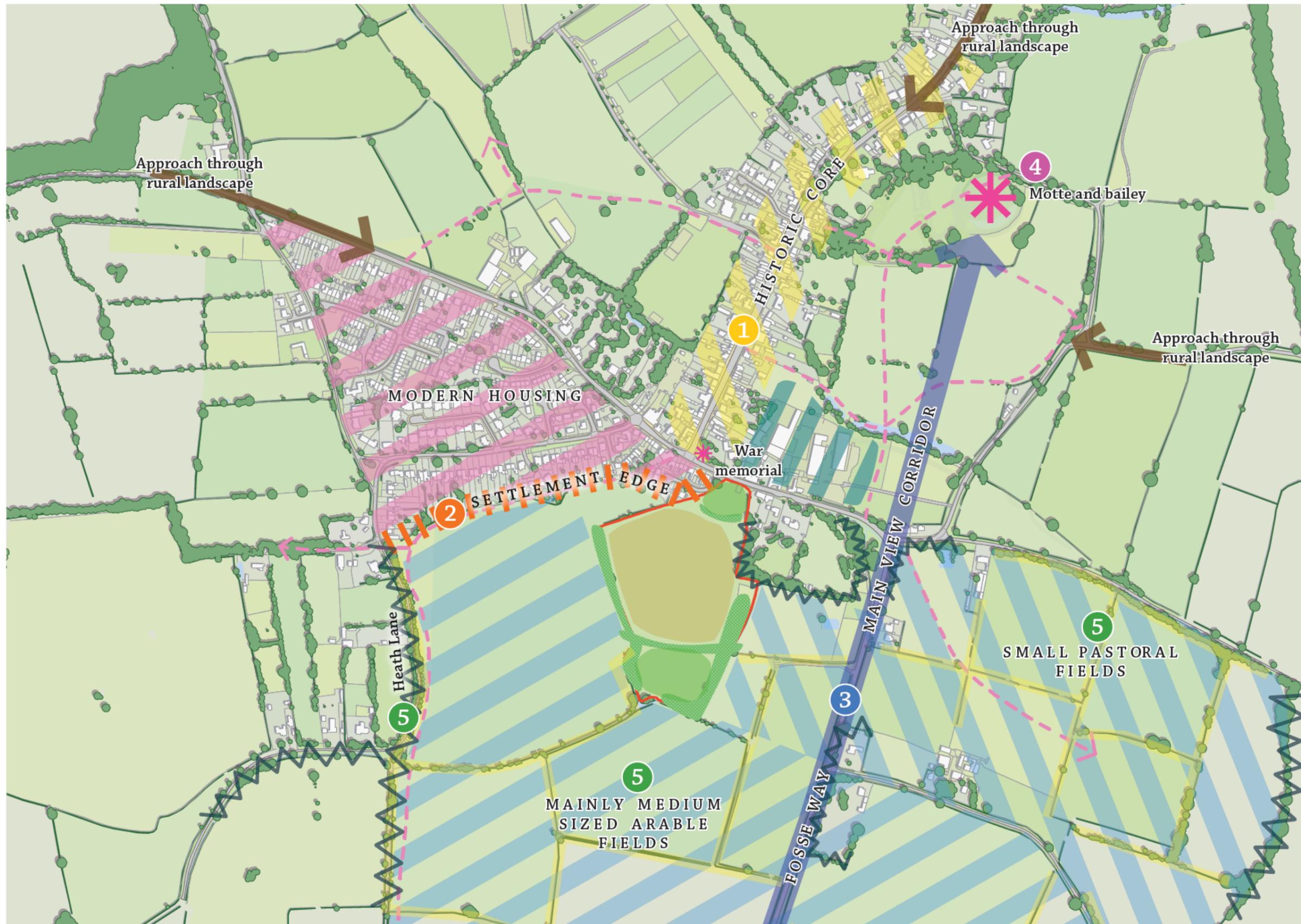
OBJECTIVE 4 – To maintain and respond to the motte and bailey setting – The large farmstead north of the site and the cluster of houses to the east off Rugby Road provide a degree of separation and visual containment between the site and the motte and bailey. There is an elevated long distance panoramic view from the top of the monument, which includes views to the south across the site to the wider countryside beyond. The site is largely screened by existing vegetation and built form. The Fosse Way is a distinctive linear feature in the view to the south. The site's

interaction/intervisibility with Fosse Way is limited.

OPPORTUNITY 4 - Reducing the extent of development to the south of the site will minimise impact on the scenic value and setting of this view. In addition, providing opportunities for tree planting within the development area will help to integrate and soften the built form within the landscape setting.

OBJECTIVE 5 – To minimise impacts on wider rural landscape – The strong tree lined setting of Heath Lane which lies beyond the settlement edge and the public right of way and long distance footpath of Coventry Way to the south of the site, generally contains wider views towards the site from the west and south west. Closer to the site, the public right of way follows the southern settlement edge of Brinklow. The views towards the site are open and look across a large arable field. The site is seen within a settlement edge character with wider long distance views afforded across the rural landscape to the south. The wooded setting of the motte and bailey and the settlement edge of Brinklow are distinctive features in the views.

OPPORTUNITY 5 – Provide a landscape buffer along the site's western edge to provide opportunities for new tree planting. In addition, strengthen the site's western hedgerow and provide new hedgerow trees to help filter views of the proposal and to soften and integrate the built form within the wider landscape.



Landscape opportunities

5 THE STRATEGIC CONTEXT FOR THE PROPOSED DEVELOPMENT

NATIONAL POLICY

5.1 The government wishes to see 300,000 houses per annum built in the UK. Paragraph 60 of the National Planning Policy Framework (NPPF) duly states that, *“To support the Government’s objective of significantly boosting the supply of homes, it is important that sufficient amount and variety of land can come forward where it is needed”*. Paragraph 70 recognises that small and medium size sites can make an important contribution to meeting the housing requirement of an area and are often built out quickly.

5.2 Paragraph 74 notes that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Paragraph 79 states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

LOCAL POLICY

5.3 At the local level, the Rugby Local Plan was adopted in June 2019 and covers the period from 2011 to 2031. It makes provision for the delivery of 12,400 homes across the borough, including 2,800 dwellings to contribute towards the unmet housing need of Coventry. The Local Plan recognises Brinklow as a Main Rural Settlement, reflecting its broad range of services and its position as a centre that provides local services for

its population and immediate catchment. However, Brinklow was not allocated any development and no sites surrounding the village were released from the Green Belt.

5.4 On 25 October 2023, Rugby Borough Council resolved to commence a Local Plan Review by launching an Issues & Options consultation. The consultation document recognises the latest housing need evidence as contained in the Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA) 2022. The HEDNA uses the Census 2021 data, which establishes a decrease in the housing need figure for the Housing Market Area against the figure derived by the Standard Method.

5.5 Whilst the HEDNA identifies an increase in local need for the Rugby Borough Area, William Davis Homes strongly considers that the Council has not demonstrated exceptional circumstances to justify a departure from the Standard Methodology, in accordance with paragraph 61 of the NPPF. Therefore, the overall need for the Housing Market Area (HMA) should adhere to the higher Standard Method figure, ensuring alignment with both strategic and local needs of the functional market area. Furthermore, the housing need of Rugby Borough and the HMA provides the necessary evidence and justification to demonstrate exceptional circumstances for green belt release, in accordance with paragraph 145 of the NPPF.

5.6 In this regard, the site is a suitable and deliverable option for new housing growth that can contribute towards meeting local and strategic need. Further, its delivery would secure a sustainable development that can support local services and amenities. Housing growth in Brinklow would also assist households in remaining local, which the HEDNA recognises is difficult due to the lack of suitable and financially accessible family homes coming forward in rural areas (HEDNA; pages 254-255).

KEY POLICY CONSIDERATIONS

5.7 The site is located in the Green Belt. However, it does not perform strongly against the strategic purposes of the Green Belt as defined at paragraph 138 of the NPPF. The Coventry & Warwickshire Joint Green Belt Study Part 2 (2016) identifies that Parcel BR3, which includes the Rugby Road site, confirms that the site performs poorly against Strategic Purposes 1 – 4 as per paragraph 143 of the NPPF, which supports the case for Green Belt release in this location.

5.8 In addition, the site’s development for housing, open space and landscaping would meet several strategic planning and placemaking objectives in the NPPF, including:

- Helping to provide economic support for shops and services in the village centre (paragraph 83)
- Promoting a healthy community and sustainable transport by maximising opportunities for walking and cycling (paragraph 116a)
- Making effective use of land (paragraph 123)
- Achieving a high-quality, well-designed development (paragraph 131)
- Delivering sensitive and well-landscaped development that responds to heritage designations and history (paragraph 135c)
- Delivering a new defensible and permanent green belt boundary (paragraph 148)
- Conserving and enhancing the natural and historic environments through measurable biodiversity gain and buffers to Brinklow Conservation Area (paragraphs 180 and 200)

6

WHY THIS SITE?

A sustainable location for new development

- It is in a highly sustainable location and within easy walking and cycling distance of Brinklow's facilities including the post office, surgery, community centre, primary school, allotments and a number of public houses
- It has direct access from Rugby Road and is within 150m of bus stops providing direct access to Rugby and Coventry.

Site is unconstrained and accessible

- The site is free from statutory designations and geographically is a good site to consider for development due to its proximity to existing facilities
- The site is deliverable with no on-site constraints that would prohibit development
- It has good pedestrian and cycle access to the wider village
- The site has level access and can be accessed safely from Rugby Road.

New housing will sustain the village

- New homes will help support local services and facilities and sustain the village as a Main Rural Settlement in line with the objectives of the adopted Rugby Borough Plan
- A variety of housing types, sizes and tenures can be provided
- 30% affordable housing will be provided and managed by a registered provider
- Some specialist housing for older people can be provided.

Limited wider impact of the proposal

An appropriate and considered approach to defining the development edge will limit the impact on the southern fringes of Brinklow

- Sensitive design will create a responsive layout that considers important views, particularly of Brinklow Castle
- There is potential to provide new and strengthen existing green infrastructure to help soften the visual impact of new development
- The site is a logical extension and rounding off to the settlement that will help deliver a new permanent defensible green belt boundary
- The provision of open space and structural soft landscaping will help to preserve and enhance the setting of the Brinklow Conservation Area and nearby listed buildings.

7

THE VISION

Design cues

7.1 The vision for the site follows on from the layered analysis of the site, Brinklow and its context. This has led to several design cues to inform the emerging masterplan.



1. Views of Brinklow Castle

7.2 The motte and bailey of Brinklow Castle can be glimpsed from within the site area. Therefore if possible the masterplan should retain these occasional views of the castle.

7.3 The internal street network could be aligned to create these views, framing the castle from within the masterplan and respecting its importance.



2. Brinklow conservation area

7.4 The northern part of the site borders the Brinklow conservation area, which features a number of listed and locally important buildings. The masterplan should respond to this edge by creating an appropriate buffer to the conservation area on the northern edge.

7.5 There is also the opportunity to create vistas to the attractive red brick building on Coventry Road.

7.6 The masterplan should reference the scale and materials used within the conservation area.



3. Use of crescent/verges

7.7 Along the northern part of Broad Street is The Crescent, an attractive, wide, grass and treed verge. It helps form the setting to St. John the Baptist church as well as Brinklow Castle.

7.8 A more modern interpretation of this verge can be seen along Heath Lane, with the front gardens and building line creating a subtle crescent along the street.

7.9 The masterplan has the opportunity to reference this characterful element from the village.



4. Local typologies, form and scale

7.10 The urban form of the village is predominantly linear, especially along Broad Street and Coventry/Rugby Road. Therefore the masterplan could feature a strong central linear corridor in reference to the village centre.

7.11 The village comprises a variety of architectural styles and typologies, which are generally traditional in character.

7.12 Buildings in Brinklow feature decorative brickwork, clay and slate roof tiles and elements of timber panelling and stone details.

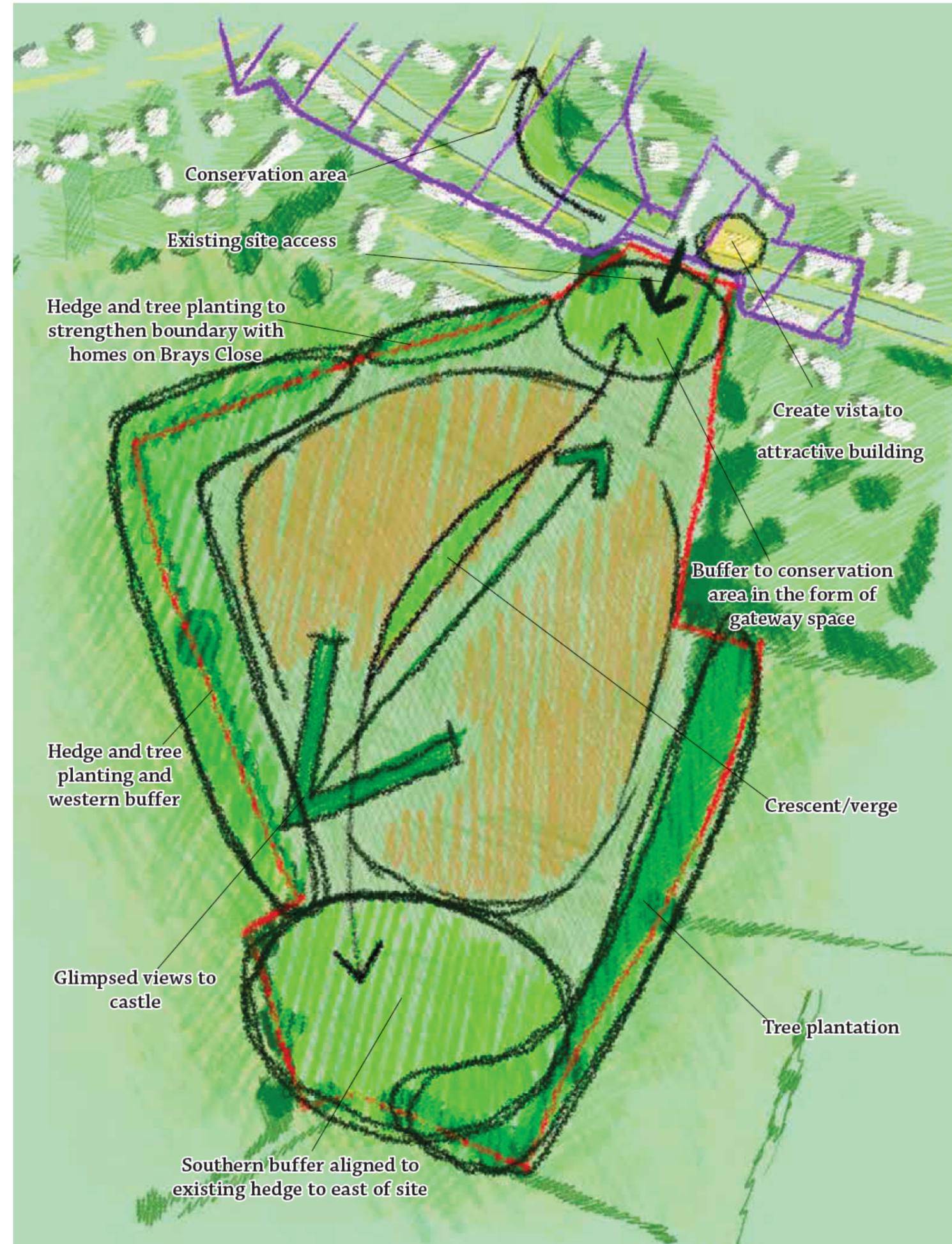
These design cues will form the framework elements of the masterplan, which begin to take shape in the plan opposite.



5. Site edges

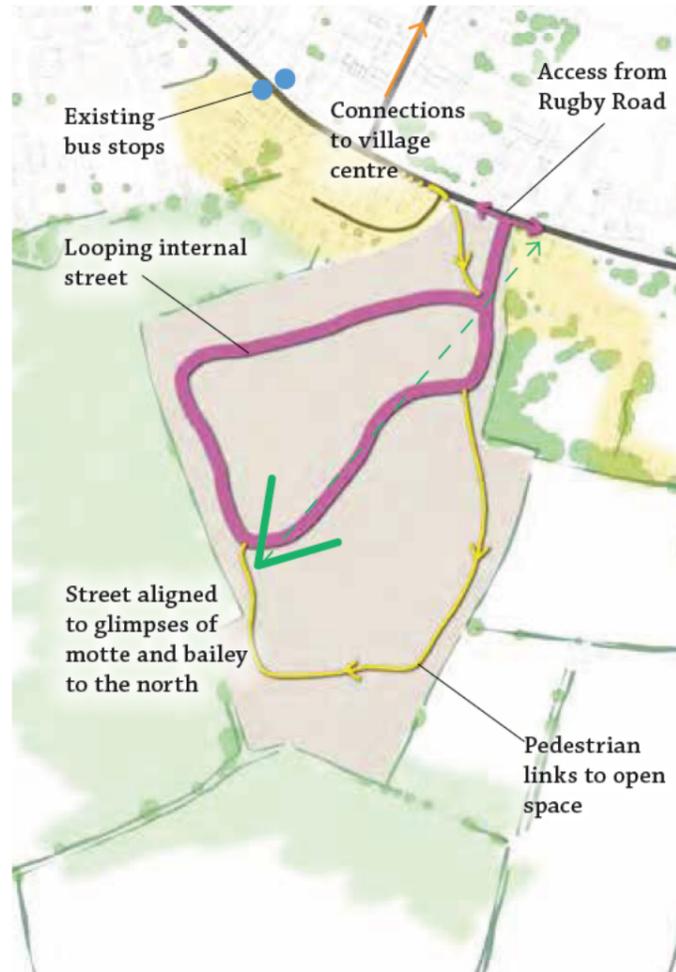
7.13 The western edge of the site features a tree plantation that should be retained and strengthened within the masterplan. Over time this will create a natural woodland edge to the site area. The southern edge of the site features views over the wider countryside, and the character of the site changes from semi-rural to rural. The masterplan could feature lower residential density on this southern edge to blend with this more rural feeling.

7.14 The western edge features a mix of hedge and tree planting, which should be retained and strengthened, with an appropriate buffer to the open fields beyond. Where the site borders homes in Brays Close, the current post and wire fencing should be strengthened with new hedge and tree planting, and a generous set back applied to retain the privacy of existing residents.



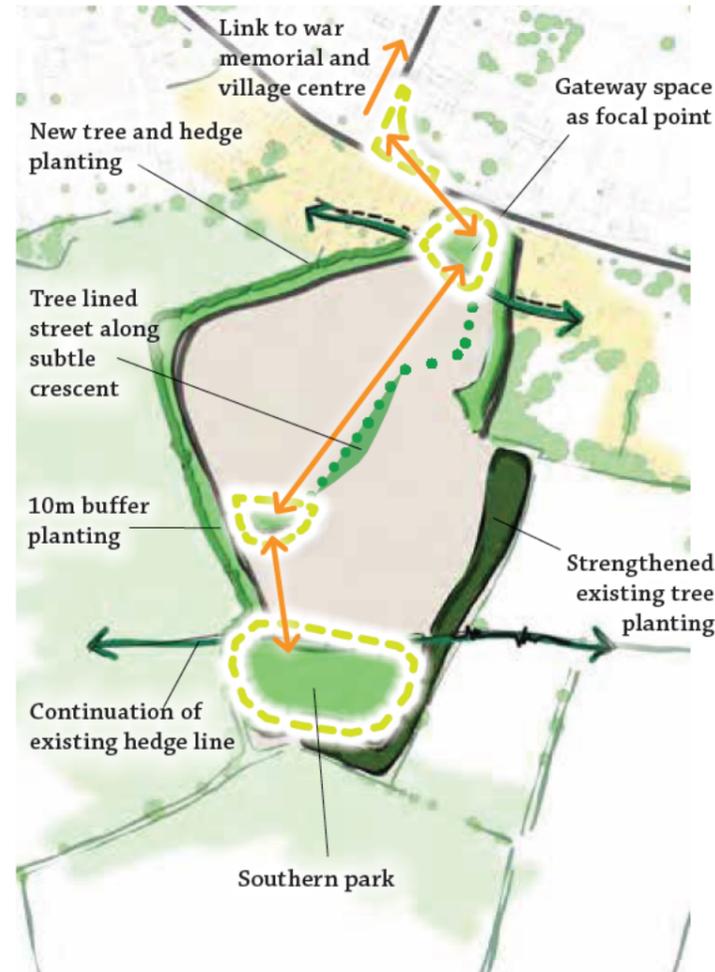
Developing the concept masterplan

The concept masterplan is structured by the three framework elements shown below.



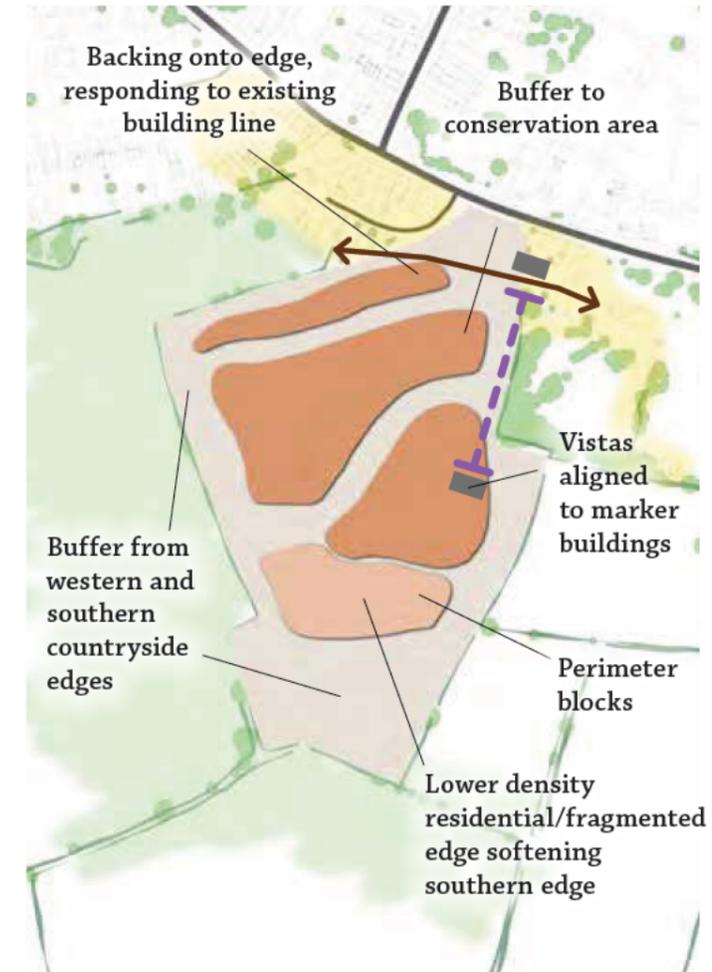
Movement framework

- Site is well located to access the village centre on Broad Street, with existing pavements along Rugby Road - potential for a defined pedestrian crossing point
- Proposed vehicular access from Rugby Road
- Street aligned for glimpsed views of historic motte, and forms an internal loop through site, linking to lower order streets and pedestrian connections
- Attractive walking trail through variety of greens and open spaces
- Short walk to existing bus stops on Coventry Road and Broad Street.



Green framework

- Create focal green gateway space at site entrance, retaining existing mature trees, location for potential natural play area
- A series of connected green spaces through the site, including the gateway space will visually and physically link to the war memorial green space on Broad Street, reinforcing the connection with the village centre.
- Strengthened green framework around the site
- Tree lined street connects principal areas of open space with potential to reference the village crescent
- Southern park to feature wildflower meadows, trails and picnic areas.



Development framework

- Parcels of perimeter blocks with interconnecting street network
- Mix of detached, semi-detached and terraced homes
- Lower density residential, fragmented on southern edge to soften development towards countryside
- Development parcels set back from sensitive edges including conservation area on northern edge
- Marker buildings aligned to key vistas
- Backing onto northern edge of site and reflecting building line of Brays Close.

7.15 When combined (below), the constituent elements of the framework masterplan illustrates the vision and structure for the site:

- The masterplan is a logical extension to Brinklow, positioned in the correct location with good links to the village centre and beyond
- The masterplan will create an attractive new neighbourhood to the village and provide much needed new homes
- This is a responsive masterplan, which reflects the local character and heritage of the village

- A series of linked green spaces connects the site with the village centre
- The masterplan also responds positively to its site edges, with strengthened areas of tree and hedge planting, and buffers to sensitive edges.

The framework plan has been further refined and developed to create the concept plan shown right, indicating the broad arrangement of development blocks, open spaces and streets.



Framework plan



Concept plan

Illustrative masterplan

7.16 The illustrative masterplan is responsive to both the site area and wider village. It is based upon a layered analysis of the site and context, its landscape setting and heritage.

7.17 The structuring framework elements of movement, green framework and development have synthesised to form an attractive new neighbourhood for Brinklow.

7.18 The layout frames vistas of key buildings and spaces/trees, using perimeter blocks to create a clear distinction between public and private spaces.

7.19 A safe and welcoming network of low vehicular speed streets interconnect the new homes, and link areas of open space and pedestrian routes.

7.20 The proposed new vehicular access from Rugby Road has been informed by pre-application engagement with Warwickshire County Council Highways, the Warwickshire Design Guide and speed surveys, and is considered to be acceptable.

- 1 Site vehicular access from Rugby Road
- 2 Attenuation features designed as part of a wider sustainable drainage system, supported by small ponds and swales. These will also increase biodiversity and be attractive landscape features
- 3 Tree lined street aligned to afford glimpsed views of the motte and bailey. The tree lined street features a subtle crescent of built form on its southern edge to reflect this attractive feature in the village
- 4 Gateway green providing a setting to the existing mature trees. The green will visually connect to the war memorial green on the southern edge of Broad Street, and create a setback to the conservation area north of the site. The green will also provide an attractive open space for natural play
- 5 Retained trees and hedgerows will be supplemented with new hedge and tree planting, in particular along boundaries with existing homes
- 6 Western edge set back from site boundary, featuring fragmented building line in response to countryside edge
- 7 Southern edge to feature lower density residential and fragmented edge in response to the countryside setting
- 8 Existing tree plantation to be retained and strengthened. Over time this will create a strong natural edge to the site
- 9 Continuation of existing building line into the site, with proposed large rear gardens backing on to existing neighbouring gardens to ensure privacy for existing residents
- 10 Southern park with areas of wildflower meadow, benches, nature trails and mown grass for picnics.

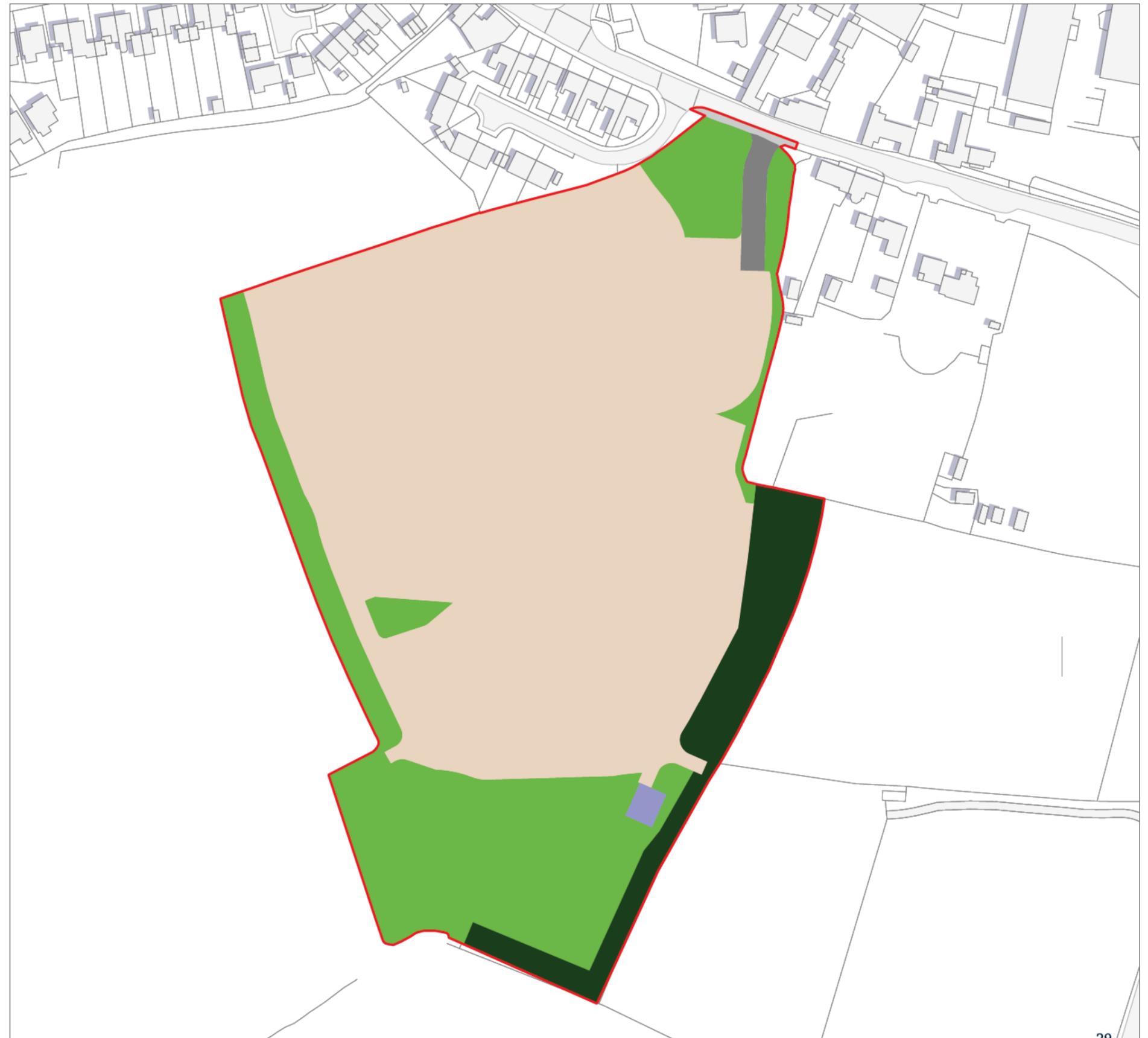


Land uses

7.21 Based on a net residential area of 3.57ha, the masterplan can provide between 98 and 116 new homes at an average residential density range of 27.5 dwellings per hectare to 32.5 dwellings per hectare.

7.22 In addition, the masterplan provides open space in the form of new gateway space, a southern park and various smaller elements of incidental green space, along with areas of retained and proposed tree planting.

	Site boundary	5.21ha
	Primary road	0.05ha
	Open space	1.19ha
	Existing tree plantation	0.36ha
	Pump station	0.01ha
	Highways improvements	0.01ha
	Residential development	3.57ha
	@27.5dph	98 units
	@30dph	107 units
	@32.5dph	116 units



Land use plan

Village context





8

WILLIAM DAVIS HOMES

Based in Leicestershire and trading for over 85 years, William Davis Homes is one of the Midlands' leading independent house builders, with a track record of successfully creating award-winning sustainable communities across the region.

8.1 William Davis Homes prides itself on utilising locally sourced supply-chains and tradespeople, to ensure the delivery of homes of the highest standard. Best practice underpins the culture of the company, which is reflected in their five-star status for 7 years running, as rated by the Homes Builders Federation's annual survey of homeowners.

8.2 By identifying sustainable and appropriate sites for development, William Davis Homes is able to realise residential development that is able to contribute towards supporting local communities and responding to the Climate Emergency through a strategy of environmental enhancement. This includes the planting of over 700 trees and 2000m of hedgerow to ensure appropriate offset and measurable improvements.



At Land South of Rugby Road, Brinklow, William Davis Homes will:

Deliver high quality, much needed new homes

The proposal can deliver much needed high quality family homes in a sympathetically, landscaped environment. This will include a mix of house types and sizes, including affordable housing and specialist housing for the elderly.

Define a new logical and defensible boundary to the green belt

The development will establish an appropriate and responsive settlement edge to the southern fringe of Brinklow, strengthened with structural and strategic soft planting to provide a defensible and permanent new boundary to the green belt.

Respect Brinklow's unique historic environment

The emerging concept masterplan incorporates careful consideration of Brinklow's heritage assets, with maintained views of Brinklow Castle and provision of appropriate buffers to maintain the setting of the Conservation Area and listed buildings.

Proposed a sustainable approach to movement

The route to key destinations such as the Revel Surgery, Brinklow Post Office and other services in the village centre will be direct and convenient on foot or bicycle, thereby helping to prioritise sustainable modes of transport. This will help reduce the need for short car trips in and around the village. Homes will include cycle storage options and houses will be fitted with sufficient electrical infrastructure to enable electric vehicle charging.

Emphasise green infrastructure and biodiversity

The masterplan incorporates generous provision of open space, including the retention of existing trees and hedgerows. Tree belts that currently terminate at the eastern boundary of the site will be extended to establish a green infrastructure network that provides new, continuous linear habitats. The provision of landscape buffers to the south and west will help to increase the opportunity for biodiversity gains and for landscape screening.

Improve existing facilities and infrastructure

There is potential for the proposed development to deliver infrastructure improvements in the village via the Community Infrastructure Levy and section 106 contributions. This alongside an expanded village population will help support the existing service base in Brinklow and help maintain its position as a recognised main rural settlement.

Deliver development of the highest environmental credentials

Construction of homes on the site will incorporate strategies to mitigate environmental impacts through the provision of energy efficient materials, electric vehicle charging and alternative heating methods to align with the national departure from natural gas use.

9

SUMMARY

The proposal for Land South of Rugby Road, Brinklow will:



Support and enhance

the status of Brinklow as a Main Rural Settlement



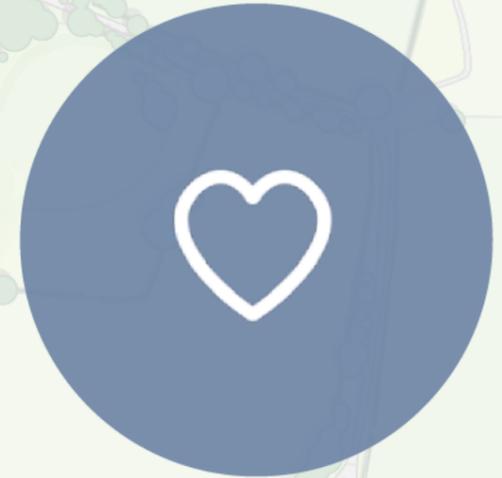
Connect

to existing local facilities in the village



Deliver

housing in a sustainable location



Provide

opportunities to contribute towards community facilities



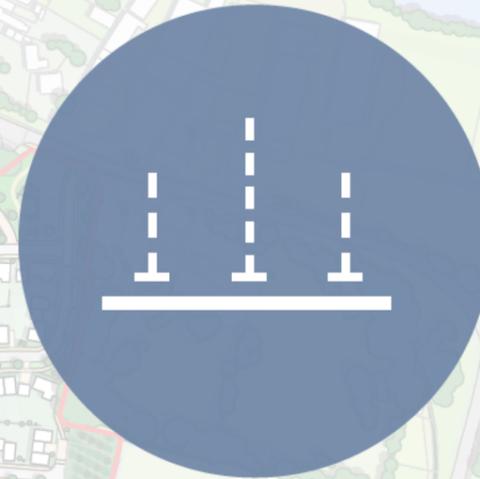
Strengthen

the existing green framework



Provide

much needed new family homes, affordable housing and specialist homes for the elderly



Create

a new defensible and permanent green belt boundary



Deliver

affordable first homes



London
Birmingham
Bournemouth

0203 664 6755
enquiries@torandco.com
torandco.com

All rights reserved.

No part of this document may be reproduced
in any form or stored in a retrieval system
without the prior written consent of the
copyright holder.

©tor&co 2024

All figures (unless otherwise stated) tor&co.

©Crown Copyright and database rights 2023
OS Licence no. AC0000849896
Contains OS data © Crown copyright and
database right 2023. Licensed under the
Open Government Licence v3.0.x

tor
&CO



London
Birmingham
Bournemouth

0203 664 6755
enquiries@torandco.com
torandco.com

All rights reserved.

No part of this document may be reproduced
in any form or stored in a retrieval system
without the prior written consent of the
copyright holder.

©tor&co 2024

tor
&CO

