



24 November 2022

CABINET – 5 DECEMBER 2022

A meeting of Cabinet will be held at 6.00pm on Monday 5 December 2022 in the Council Chamber at the Town Hall, Rugby.

Members of the public may also view the meeting via the livestream available on the Council's website.

Mannie Ketley
Chief Executive

A G E N D A PART 1 – PUBLIC BUSINESS

1. Minutes.

To confirm the minutes of the meeting held on 17 October 2022.

2. Apologies.

To receive apologies for absence from the meeting.

3. Declarations of Interest.

To receive declarations of –

(a) non-pecuniary interests as defined by the Council's Code of Conduct for Councillors;

(b) pecuniary interests as defined by the Council's Code of Conduct for Councillors; and

(c) notice under Section 106 Local Government Finance Act 1992 – non-payment of Community Charge or Council Tax.

Note: Members are reminded that they should declare the existence and nature of their interests at the commencement of the meeting (or as soon as the interest becomes apparent). If that interest is a prejudicial interest, the Member must withdraw from the room unless one of the exceptions applies.

Membership of Warwickshire County Council or any Parish Council is classed as a non-pecuniary interest under the Code of Conduct. A Member does not need to declare this interest unless the Member chooses to speak on a matter relating to their membership. If the Member does not wish to speak on the matter, the Member may still vote on the matter without making a declaration.

4. Question Time.

Notice of questions from the public should be delivered in writing, by fax or e-mail to the Chief Executive at least three clear working days prior to the meeting (no later than Tuesday 29 November 2022).

Growth and Investment Portfolio

5. Town Centre Regeneration Strategy 2022.
6. Local Plan Review.
7. Planning Enforcement Local Plan 2022.
8. Development Management Service Review.

Leisure and Wellbeing Portfolio

9. Coronation 2023 – Rugby Town.
10. Bicentenary of Rugby Union 1823 – 2023.

Finance, Performance, Legal and Governance Portfolio

11. Finance and Performance Monitoring 2022/23 – as at 30 September 2022.

Communities, Homes, Digital and Communications Portfolio

12. Access to energy efficiency measures – updated Eco-Flex statement of intent for Rugby.

Regulation and Safety Portfolio

13. Stray Dog Policy and Procedures.
14. Safer Streets 4 Grant Funding.

Change and Transformation Portfolio

Nothing to report to this meeting.

Operations and Traded Services Portfolio

Nothing to report to this meeting.

The following item contains reports which are to be considered en bloc subject to any Portfolio Holder requesting discussion of an individual report

15. Treasury Management Mid Year update 2022/23.
16. Calendar of Meetings 2023/24.

17. Motion to Exclude the Public under Section 100(A)(4) of the Local Government Act 1972.

To consider the following resolution:

“under Section 100(A)(4) of the Local Government Act 1972 the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of information defined in paragraphs 2 and 3 of Schedule 12A of the Act.”

PART 2 – EXEMPT INFORMATION

Growth and Investment Portfolio

Nothing to report to this meeting.

Leisure and Wellbeing Portfolio

Nothing to report to this meeting.

Finance, Performance, Legal and Governance Portfolio

Nothing to report to this meeting.

Communities, Homes, Digital and Communications Portfolio

1. Proposed sale of land.

Regulation and Safety Portfolio

Nothing to report to this meeting.

Change and Transformation Portfolio

Nothing to report to this meeting.

Operations and Traded Services Portfolio

Nothing to report to this meeting.

The following item contains reports which are to be considered en bloc subject to any Portfolio Holder requesting discussion of an individual report

Nothing to report to this meeting.

Any additional papers for this meeting can be accessed via the website.

The Reports of Officers are attached.

Membership of Cabinet:

Councillors Lowe (Chairman), Mrs Crane, Miss Lawrence, Picker, Poole, Roberts and Ms Robbins.

CALL-IN PROCEDURES

Publication of the decisions made at this meeting will normally be within three working days of the decision. Each decision will come into force at the expiry of five working days after its publication. This does not apply to decisions made to take immediate effect. Call-in procedures are set out in detail in Standing Order 15 of Part 3c of the Constitution.

If you have any general queries with regard to this agenda please contact Claire Waleczek, Democratic and Support Services Manager (01788 533524 or e-mail claire.waleczek@rugby.gov.uk). Any specific queries concerning reports should be directed to the listed contact officer.

AGENDA MANAGEMENT SHEET

Report Title: Rugby Town Centre Regeneration Strategy 2022

Name of Committee: Cabinet

Date of Meeting: 5 December 2022

Report Director: Chief Officer – Growth and Investment

Portfolio: Growth and Investment

Ward Relevance: All wards

Prior Consultation: Stakeholder Consultation January - February 2021
Public Consultation including a survey March 2021
Public Consultation September – November 2021
Business Breakfast April 2022

Contact Officer: Helen Nightingale, Major Projects & Economic Development Manager.

Public or Private: Public

Report Subject to Call-In: No

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C)
 Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E)
 Residents live healthy, independent lives, with the most vulnerable protected. (HC)
 Rugby Borough Council is a responsible, effective and efficient organisation. (O)
[Corporate Strategy 2021-2024](#)
 This report does not specifically relate to any Council priorities.

Summary:	The report recommends Cabinet to approve the Rugby Town Centre Regeneration Strategy which sets out the strategic vision and framework for investment and change in Rugby Town Centre to 2035.
Financial Implications:	None as a direct result of this report.
Risk Management/Health and Safety Implications:	By not having the Rugby Town Centre Regeneration Strategy, the Council is at an immediate disadvantage when looking to apply for external funding or when trying to lever in wider investment as there is no overarching strategy to revitalise and level up the Borough's town centre.
Environmental Implications:	A Climate Change and Environmental Impact Assessment has been completed and is attached as appendix 2. The Rugby Town Centre Regeneration Strategy supports the aims of the Council's Climate Change Strategy.
Legal Implications:	None identified.
Equality and Diversity:	An Equality Impact Assessment has been completed and is attached as appendix 3. There is a positive impact on people with disabilities.
Options:	Option 1 Agree to adopt the Rugby Town Centre Regeneration Strategy Option 2 Not agree to adopt the Rugby Town Centre Regeneration Strategy
Recommendation:	IT BE RECOMMENDED TO COUNCIL THAT the Rugby Town Centre Regeneration Strategy, as at Appendix 1 to the report, be adopted.
Reasons for Recommendation:	To enable the Council to deliver the investment and development opportunities in the town centre as identified within the strategy up to 2035.

Cabinet - 5 December 2022

Rugby Town Centre Regeneration Strategy

Public Report of the Chief Officer – Growth and Investment

Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT the Rugby Town Centre Regeneration Strategy, as at Appendix 1 to the report, be adopted.

1. INTRODUCTION

- 1.1. In 2020 the Council commissioned the Rugby Town Centre Regeneration Strategy to help realise the potential of the town centre ensuring it remains the at the heart of the borough at a time when the functionality of a town centre is shifting from predominantly retail uses to a wider range of leisure, retail and community uses.
- 1.2. The Strategy sets out a strategic vision and framework for investment and change in Rugby town centre to 2035.
- 1.3. This Strategy has been developed to align with and deliver the Council's Corporate Strategy.
 - Working together to further improve the borough's connectivity and encourage greener travel.
 - Promote the borough of Rugby as a place to do business.
 - Encourage and support sustainable economic growth, consistent with our social and environmental priorities.
 - Help businesses thrive and provide jobs for our residents.
 - Develop and promote our town centre as a place to live, socialise and work.
 - Regenerate Neighbourhoods that need support and build communities that sustain change.
 - Nurture and support independent shops.

2. PURPOSE OF REPORT

- 2.1. To seek Cabinet approval to adopt and publish the Rugby Town Centre Regeneration Strategy to provide a framework for investment and development in the town centre.

3. BACKGROUND

- 3.1. The purpose of the strategy is to provide a clear framework for decision-making including setting parameters for development, steering investment priorities and providing the basis for landowners and investors to progress their plans. It is a blueprint through which the Council will seek to work in partnership to influence change and investment in the town centre.

- 3.2. The Strategy is highly ambitious with significant interventions proposed. It is however also pragmatic, recognising that for real change to occur a series of steps will need to take place to shift the perceptions of the town centre and build confidence for investors and consumers.
- 3.3. The Strategy includes both physical and non-physical proposals and a delivery strategy, where required, to enable decision-making and leverage change.
- 3.4. The principal objectives of the Strategy are to put people first, create a resilient town centre, invest in the physical environment and ensure a delivery focus. The Strategy intends to form the foundation block for the delivery of these objectives and in doing so a number of character areas have been identified as well as a list of physical and non-physical interventions, in addition to specific catalytic projects to instigate change.
- 3.5. Within the Strategy the following frameworks have been developed to inform, link and enhance the identified character areas and list of projects:
- Movement Framework – create a town centre where walking, cycling, and using public transport is second nature and accessible to all;
 - Public Realm and Open Space Framework – create attractive streets and spaces, establish greener character to aid climate resilience, enhance existing spaces and integrate water management, biodiversity and air quality priorities;
 - Development Framework – indicate appropriate storey heights, development uses and quantum.
 - Delivery Framework – an action plan to identify next steps to deliver projects listed in the short, medium and long term.
- 3.6. The town centre has been looked at holistically to enhance the physical environment, inject vitality, create a greener and more attractive destination for residents, businesses and visitors all whilst ensuring the impacts of climate change are at the centre of all considerations.
- 3.7. Extensive consultation with local businesses, landowners, stakeholders and residents has been undertaken over the last two years which have all shown positive support for the ideas and aspirations of the Strategy.
- 3.8. The Council is already activating some of the ‘Meanwhile Use’ elements of the Strategy including the changes proposed to the Markets in Rugby which will start to evolve early in 2023 and also public realm improvements and planned events in the town which are being supported by UK Shared Prosperity Fund monies.

4. CONCLUSIONS AND RECOMMENDATIONS

- 4.1** To enable the Council to deliver the investment and development opportunities in the town centre it needs to have a clear vision. The Strategy provides the direction and a plan to deliver the change and lever in investment over the short, medium and long term. In order for these changes to be enacted it is recommended that the Rugby Town Centre Strategy is adopted.

Name of Meeting: Cabinet

Date of Meeting: 5 December 2022

Subject Matter: Rugby Town Centre Regeneration Strategy

Originating Department: Growth and Investment

DO ANY BACKGROUND PAPERS APPLY **YES** **NO**

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
1	Rugby Town Centre Regeneration Strategy
2	
3	
4	
5	
6	
7	
8	

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A



RUGBY

REGENERATION STRATEGY



NOVEMBER 2022



Allies and Morrison







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FOREWORD



When I took office as Leader of Rugby Borough Council, I stated that I had sought that position in order to transform our town centre for the better.

Whilst there are many things that are positive about our town centre, it is well-known throughout the borough that our town centre is not achieving its full potential.

The problems that we face in Rugby town centre are by no means unique. Towns of our size, up and down the country face exactly the same issues as changing shopping habits change what were once thriving retail hubs.

But whilst our problems are not unusual, it has long been my belief that the strengths of this borough place us in a far, far stronger position than most to tackle those problems. This spatial strategy is about giving us the means to harness those strengths and use them to bring about a scale of change that is at very least a once in a generation opportunity - if not once in a century.

We are one of the fastest growing towns in the entire United Kingdom, and with the scale of that growth comes huge economic opportunity. In addition to our growing population, we are also without any doubt one of the best located and best connected towns in the country. This strategy will enable us to maximise these considerable assets to drive the transformation of our town centre.

The town centre of the 20th century was one characterised by identikit high streets, dominated by major chain store retailers, with little local identity. As we reach the end of the first quarter of the 21st century, with so much shopping now taking place online or out of town, where retailers can enjoy more space, we need to recognise that a thriving town centre will do so on a fundamentally different basis.

A thriving 21st century town centre is one which blends a variety of uses to create a destination. We will still have retail, but there will be far more of the sort of independent retailers we currently have in Regent Quarter. We will look to significantly increase the range of restaurants, bars and other places of entertainment, along with enhanced areas of public spaces to ensure that our town centre becomes a place where people come to meet and enjoy themselves. We will also look to increase the number of homes in our town centre significantly - something which will not only help to address the need for affordable housing in the borough, but will also bring much needed additional footfall into the town centre to support businesses.

This strategy will also ensure that both our town centre and borough as a whole, adapts to meet our climate change aspirations. Building more homes on brownfield sites, in our town centre, will reduce the need to build on green fields in the future. Investing in alternative, more sustainable transport options, will also reduce reliance on the car.

It is my firm belief that this spatial strategy offers a comprehensive solution to the issues we face in our town centre - a solution that is right for Rugby. The adoption of this spatial strategy will galvanise our regeneration efforts, and will act as an investment prospectus to secure public and private sector funding to make the changes necessary. It is a vitally important step on our journey to transforming our town centre, and one which will give us to the means to fund and build a town centre which will thrive for years to come.

Councillor Seb Lowe
Rugby Borough Council

1 INTRODUCTION

A new vision for Rugby town centre

- 1.1 Rugby is one of the fastest growing boroughs in the country. Planned housing and employment growth is focused around Houlton, South West Rugby and Coton Park East. In these locations, it is envisaged that over 11,500 homes will be delivered over the next 10-15 years, alongside the creation of significant new employment opportunities.
- 1.2 This is an exciting time for Rugby and sets an important context for future opportunity in the town centre. It is fundamental that Rugby town centre remains at the heart of the borough; that it encompasses an offer to attract this growing catchment and that of the wider sub-region, alongside maximising the potential of its existing catchment and appeal.
- 1.3 Rugby is the principal town in the Borough of Rugby and a key sub regional settlement in Warwickshire. It plays a critical role in terms of amenity and service provision for an immediate and wider community.
- 1.4 It is a town steeped in history – following its rapid expansion in the mid 19th Century as a result of railway investment and coalescence by virtue of its central location nationally, Rugby was the birthplace of the jet engine, housed the once largest radio transmitter in the world, and of course Rugby School was famously the birthplace of the game of rugby and remains an asset to this day.
- 1.5 The central positioning of Rugby remains advantageous and is a driver of growth and

investment within the borough. Being located on the West Coast Mainline, the town centre connects to Central London within an hour, and logistics is a key sector aligned with access to the 'Golden Triangle' motorway network (M6/M1/M42), A5 corridor and London's 'Magic Circle'.

- 1.6 Even within this context however, Rugby town centre has not been immune to wider influences in recent years. The continued growth of online retailing, which was exacerbated through the COVID-19 period, has had huge impact on town centres up and down the country. Even with its relatively affluent catchment and history, Rugby town centre has been impacted.
- 1.7 Over the last 18-months, during a period like no other before in living memory, the local community, businesses and wider stakeholders have come together to feed into establishing a clear vision and framework for investment in Rugby town centre. This document is the result of that process.
- 1.8 Collectively we want to ensure that we preserve the best of the town centre; that it remains vibrant and attracts people from across our community. We recognise that we need to ensure that the town centre is resilient to market and macro-economic changes. In doing so, we will celebrate what is special about Rugby town centre.

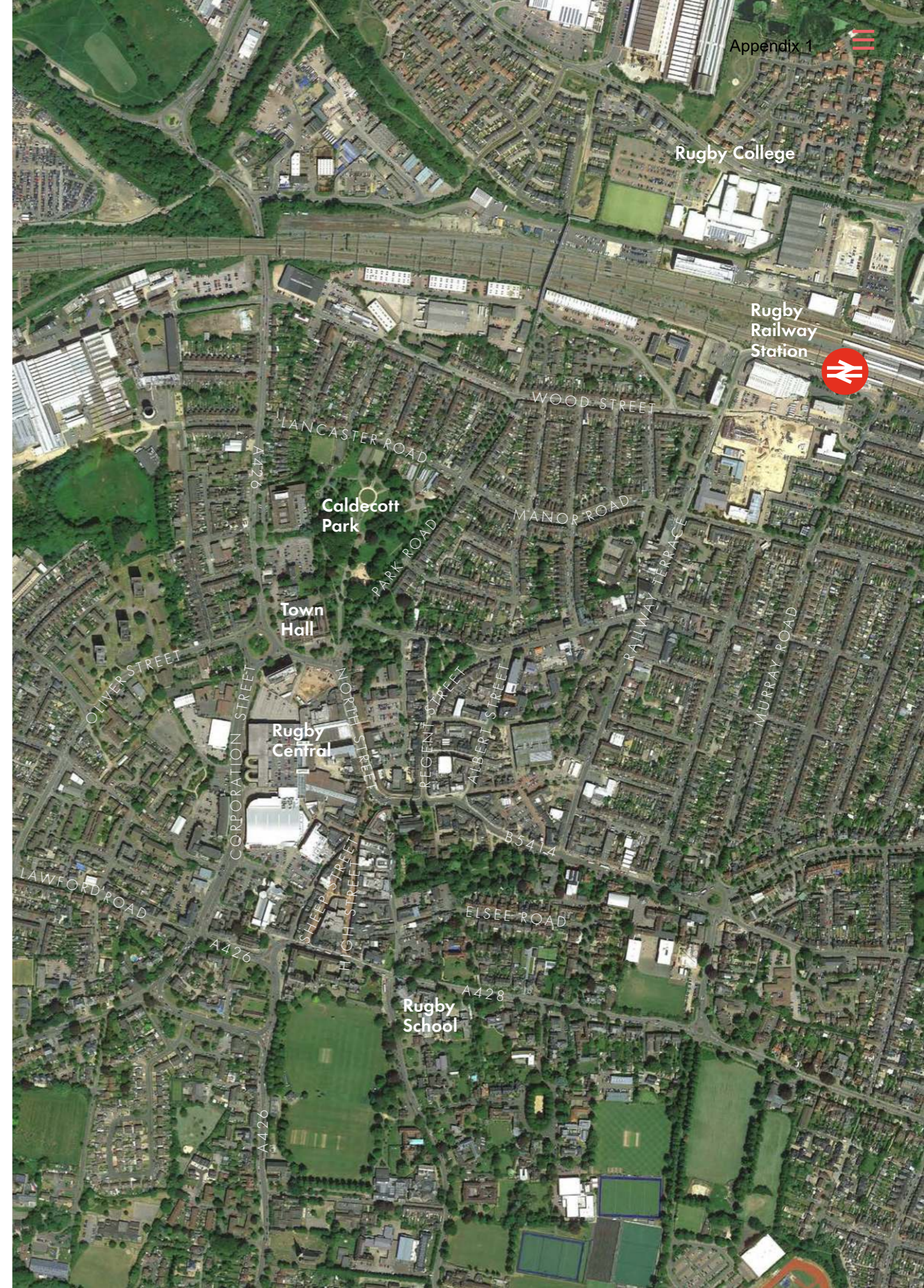


Fig 1 Photographs illustrating the rich range of characteristics of Rugby town centre

Scope

- 1.9 The Regeneration Strategy focuses on Rugby town centre, including Rugby Town Hall in the north and Rugby School in the south and the key movement corridors of Corporation Street and North Street. It links key nodes surrounding the centre, including Rugby Railway Station in the north east, Elliott's Field Retail Park to the north and the Hospital of St Cross to the south.
- 1.10 Its purpose is to provide a clear framework for decision-making including setting parameters for development, steering investment priorities and providing the basis for landowners and investors to progress their plans with confidence. It is the blueprint through which the Council will seek to work in partnership to influence change and investment in the town centre.
- 1.11 The Strategy is highly ambitious with significant interventions proposed. However, it is also pragmatic, recognising that for real change to occur, a series of steps will need to take place to shift perceptions in the town centre and build up confidence for investors and consumers. It includes both physical and non-physical proposals and delivery strategies where required to enable decision-making and leverage change.

Fig 2 Aerial photograph highlighting the existing town centre context (opposite page)



Regeneration context

1.12 Investment in the town centre must also align with other destinations and wider ambitions for the Borough. For example, we have considered the complementary role that the town centre plays alongside Junction One and Elliott's Field.

1.13 The Council also have plans for significant wider change including the delivery of homes and jobs across three strategic projects:

- Coton Park East – Allocated for 800 homes, 700 currently have planning permission.
- Houlton – Adjacent to the proposed Rugby Parkway Railway Station, delivering 6,200 new homes, significant new employment space, community facilities, open space and new retail.
- South West Rugby – Delivering 5,000 new homes and significant new employment space as well as new retail and community facilities.

1.14 The ambition of these projects demonstrates an appetite to invest in Rugby, which has become an attractive market for developers.

1.15 The Regeneration Strategy offers an opportunity to position the town centre positively in response to the significant growth envisaged in the wider Borough.

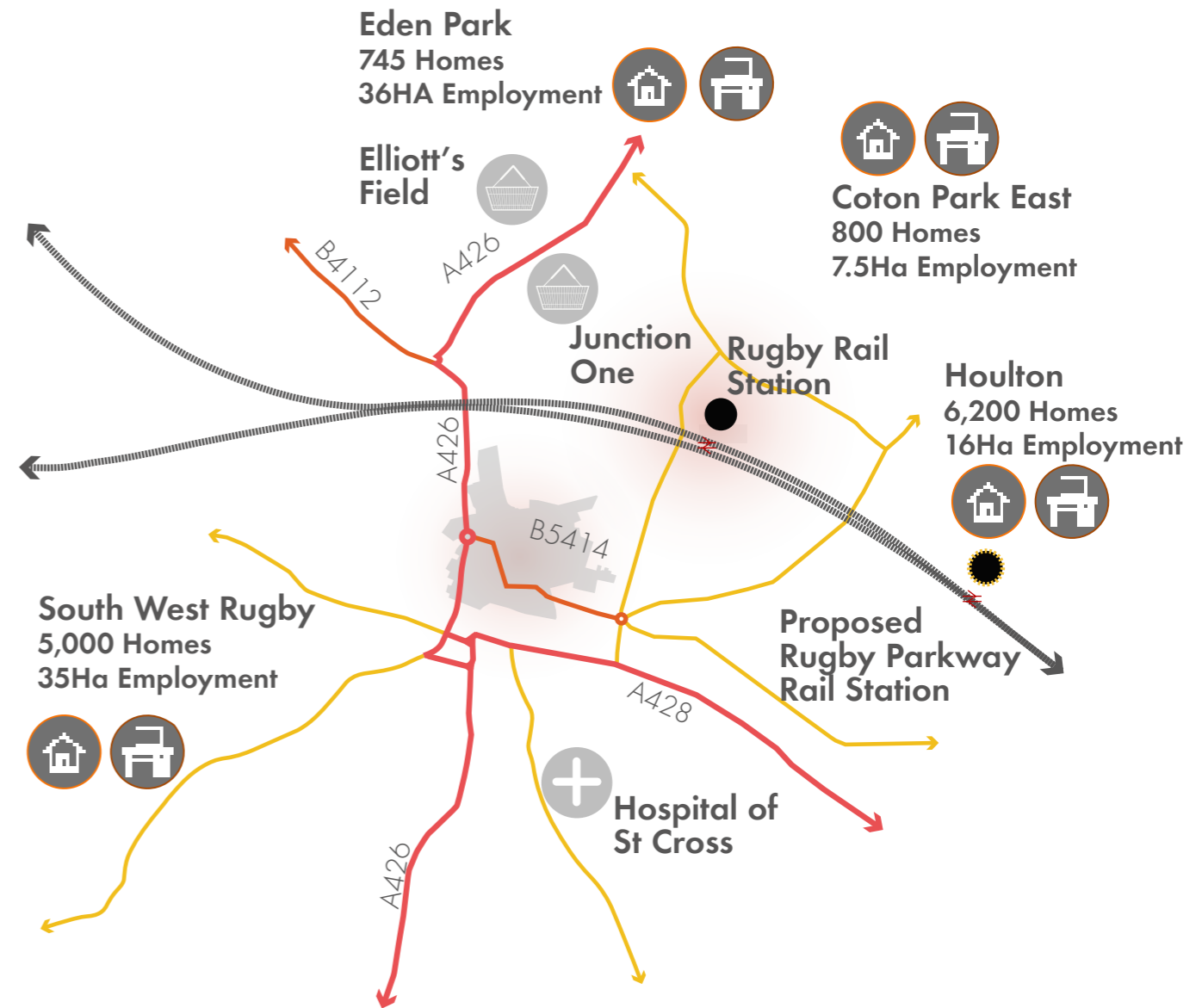


Fig 3 Strategic regeneration context

Engagement context

How have we involved the community and local businesses?

1.16 We have undertaken three key stages of engagement, commencing in January 2021 and completing in November 2021. An additional programme of business engagement was undertaken in April 2022:

- Stage 1: January – February 2021: one-to-one stakeholder meetings held including Rugby Council officers, key local representatives, major businesses and landowners;
- Stage 2: March 2021: a two-week public consultation was held with the wider community including a survey to establish local priorities for the regeneration of the Town Centre, with over 1,200 survey responses received;
- Stage 3: September – November 2021: a six-week public consultation exercise including website production, an online survey, in-person exhibitions, an on-line drop in business session and an on-line stakeholder workshop, held as listening exercises and opportunity to test vision, objectives and initial thinking on major projects and our 'big ideas', with 635 survey responses received; and
- Business breakfast: April 2022: A more informative and direct opportunity for local businesses to engage in the process, including conversation around direct town centre improvements that could be delivered to create greater resilience.

Status of document

- 1.17 The Regeneration Strategy is based on an extensive evidence base and significant stakeholder and community engagement as noted. Many people and organisations have generously given their time, feedback and opinions and so are eager to see delivery of development within Rugby town centre in accordance with the Strategy.
- 1.18 The Regeneration Strategy sets out a strategic vision and framework for investment and change in Rugby town centre to 2035. It will be agreed by the Council to directly inform funding and investment decision making and will be a material consideration for planning applications in the future.
- 1.19 This is a long term vision, and as such it covers a period beyond existing planning policy. The Rugby Local Plan review will be informed by this document, and the evidence base sat behind it, in any review of town centre policies.



Fig 4 Our online surveys received a high response rate



Fig 5 Exhibition in Rugby Art Gallery and Museum

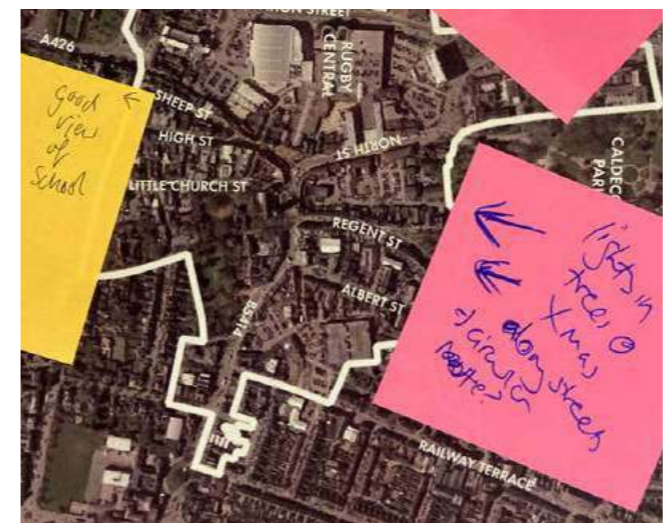


Fig 6 Exhibition at The Benn Hall



SWOT analysis - strengths

1.20 Our baseline research identified a number of key strengths which are a key asset to Rugby town centre.



Attractive and plentiful built heritage



Well located bus stops within the town centre



Enjoyable streets and spaces in the town centre



Affluent catchment for town centre across Borough, with low average levels of deprivation



Lots of parking to chose from and favourable tariffs



Quality large and pocket green spaces, street trees, and places to rest



Strong theme of independent shops



Successful traffic calming and pedestrianisation in central areas is successful



Intimate streets and alleys create people-centric environment



High levels of one year businesses survival rates (over 90%)

Excellent rail connections



Strong north/south connections



Very well connected



Very walkable and cyclable town centre



SWOT analysis - weaknesses

1.21 A number of weaknesses undermine the success of the town centre.

Underutilised car parks

Parking impacts on the quality of the public realm



Limited purpose-built office/ workspace provision within the town centre (only 7 purpose-built offices)



Poor road safety for pedestrians and cyclists



Retail offer is based around value retailers



Lots of hard-surfacing - not good for climate adaptation

Poor setting around the Museum

Lack of intuitive navigation and wayfinding



Taxis create a barrier to pedestrians and the quality of the public realm on Church Street



Fragmented cycle infrastructure and poor quality cycle parking

“Rat-running”



Covid-19 social distancing trials unpopular

No leisure anchor in Rugby and Food and Beverage offering is scattered around the town



Poor station arrival, interchange, pedestrian and cyclist environment



Poor bus frequencies, connectivity, reliability, bus stop arrangements and information

Expensive bus fares



Empty retail units
Empty and disused buildings

Green spaces which aren't being used effectively



Poor access to green space



Railway is a barrier to North-South movement - unsuccessful resolution as present



Competition with other centres / retail
Highway dominance particularly on the gyratory / North and Church Street

SWOT analysis - threats

1.22 This page identifies the key threats which could limit the future performance and resilience of Rugby town centre.



Large provision of out of town retailing and competition from neighbouring towns



Growth: Unfettered growth and development without sustainable and active travel



Railway arches and associated traffic

Lack of defined strategy or masterplan for large areas of the town centre



Further car dependence



Impact of Covid-19



Air quality continues to worsen

Climate emergency



Health: Lack of investment in walking, cycling and public space



Highways: Continued investment in highways at the expense of more sustainable modes of transport



Retail trends decline and increase in on-line transactions



Parking: Insufficient parking provision as part of development

Resistance to changes in parking locations and patterns of vehicle use



Design quality



SWOT analysis - opportunities

1.23 Many of the weaknesses and threats on previous pages present opportunities to enhance the town centre, and have helped to shape the vision and proposals in the Regeneration Strategy.

Create a diversity of spaces which people want to use

Create better link with Warwickshire College - use of empty units for projects/experiments/exhibitions

Create stronger east/west connections within town centre

Enhance alley character whilst making these routes feel safe and giving them more character

Ensure green spaces are usable - with overlooking and an attractive and comfortable setting

Reduce street clutter and improve the quality of the public realm

Live Local – Love Local: Encourage local people to use their local town centre

Deliver a successful interchange at the train station

Create a pedestrian/cycle link from the station into the town centre

Improve pedestrian and cyclist wayfinding and signage

Meanwhile uses to activate areas which are not in use or awaiting redevelopment

Improved link from the north of the railway into town centre - encourage further integration from Warwickshire College

Improve public transport to make it an attractive offer

Improve walking, cycling and bus connectivity to Rugby town centre from surrounding neighbourhoods

Implementation of Rugby Parkway Station as part of major development

Reconsider the existing gyratory arrangements

Further traffic calming measures

Improve the quality of car parking and reduce the impact of vehicles on the quality of the public realm

Improve pedestrian and cyclist access and crossings including quietways for cycling

Improve cycle parking

Improve vibrancy within the town centre through different use mix

Consider leisure uses, increasing residential within the town centre and purpose built offices/flexible workspace

2 A VISION FOR RUGBY TOWN CENTRE

Vision for the Town Centre

- 2.1 Rugby town centre has always evolved to take full advantage of changing times – from its original birth as a market town drawing on a significant trading catchment, through its growing national significance with the convergence of major railway routes, to today where it is an important service centre for the community.
- 2.2 The vision to guide investment and change in the town centre over the next 15 years recognises we need to keep evolving, and the feedback we received through the process was clear:
- Rugby needs to compete with other centres sub-regionally as the borough grows – ensuring Rugby residents choose Rugby town centre;
 - The town centre needs to be a place that people want to go, not have to go;
 - We want Rugby town centre to be known as a great place to go;
 - The centre needs to be vibrant and home to a strong business community and economy – strong in the daytime and strong in the night-time; and
 - We want to attract visitors, but we also need a centre that our residents are proud of and that meets their needs.

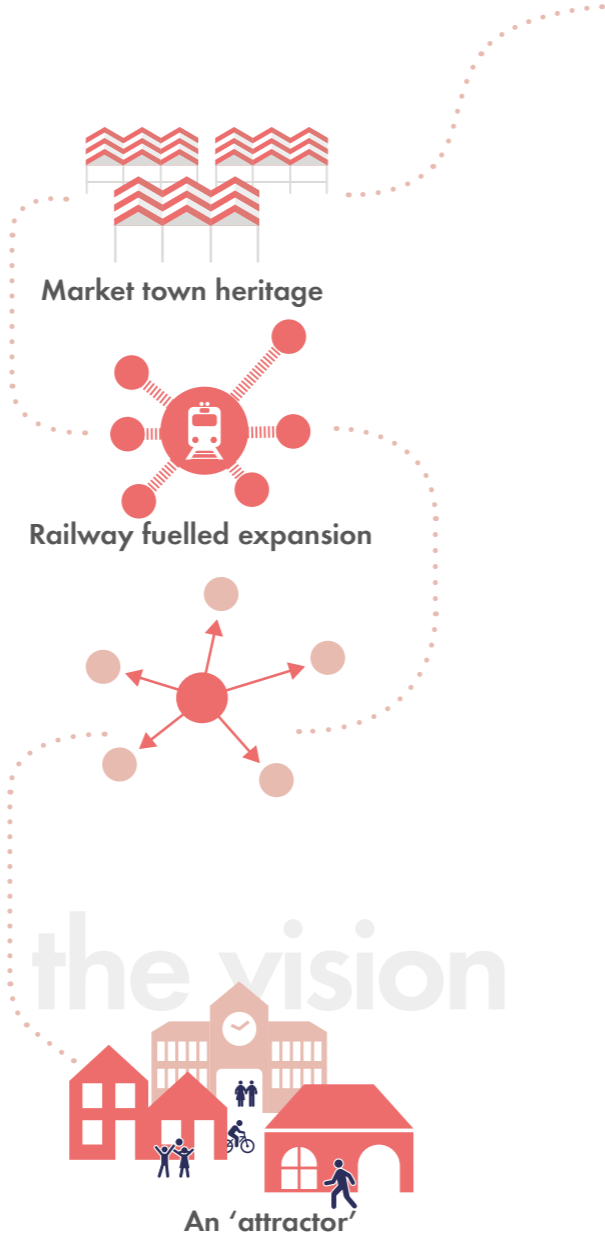


Fig 7 Our vision shapes a new identity for the town centre

Rugby town centre in 2035

Rugby town centre will be the first choice for Rugby residents and visitors.

It will be vibrant, resilient and a community focal point; supported and characterised by a strong daytime and nighttime economy, a culture of entrepreneurship, and a thriving hub of independent and national-brand businesses.

We will deliver a place and a mix of uses that puts people first, celebrates Rugby's heritage and contributes positively to the lives of our community creating a prosperous and sustainable place that we can all be proud of.

Putting People First

- 2.3 It is important that Rugby town centre is an inclusive town centre. We know that the town centre catchment is diverse in terms of its demographics, its social and ethnic composition, and its economic fortune. We also know that whilst the offer in the centre is varied, it does not currently reflect this level of diversity.
- 2.4 The town centre needs to be accessible, welcoming, and diverse. We must also recognise economic barriers to town centre access and use and look to cater for all needs to ensure it is a town centre for all our communities.
- 2.5 Rugby's diversity, both now and in the future is a strength and will continue to generate great opportunities for the town centre.
- 2.6 Improving service provision to meet the existing range of community needs will attract greater footfall into the centre, and delivering a range of housing opportunities, including affordable housing, can further complement the diverse population we have, and better meet housing needs we know exist.
- 2.7 Our ambitions include the desire to grow an independent business and retail economy in Rugby town centre, alongside retaining and attracting national high street brands. This balance will be key to attracting the full spectrum of the town centre's catchment in the future.



Creating a Resilient Town Centre

- 2.8 To enable Rugby to be a resilient vibrant town centre, we need to strengthen and diversify its offer and mix – responding to the different audiences we are trying to attract and supporting an expanded day and night-time economy.
- 2.9 So much of the business offer within Rugby is outside of its town centre, beyond the Council itself as a major employer. Wider economic changes are resulting in general trends for office downsizing and modernisation, and the market around flexible working continues to develop. Both of these trends present significant opportunity to attract business into Rugby town centre. Growing the business community will protect and encourage more investment in the retail offer within the town centre in the future from both independent and high street brands.
- 2.10 Notwithstanding the above, the retail offer must evolve. A key measure of the success of the centre will be its ability to attract footfall and spend during the day, evening and night-time across weekdays and weekends.
- 2.11 In a post-COVID-19 world we know the importance of leisure and food and drink offer alongside retailing to attract people into town centres. We want to attract these wider ranging activities into the centre, complementing our existing theatre and cinema offer. We will embrace opportunities around competitive socialising, look to diversify the Rugby Market offer to include food, drink and specialist markets, and support the expansion of our café and restaurant offer.



Investing in our Physical Environment

- 2.12 The Regeneration Strategy will ensure the town centre is better connected to its existing and future communities, and that heritage is protected and enhanced as a core principle at the heart of Rugby town centre’s character and appeal.
- 2.13 Rugby town centre is compact in scale, with many enjoyable streets and spaces that are easy to get around. However, the town centre is constrained by the significant highway infrastructure to the south and west (A426 and A428) and the railway tracks to the north, creating a physical and psychological barrier with surrounding neighbourhoods, resulting in some local people travelling (largely by private vehicle) elsewhere. The physical environment and routing on foot or on bicycle between the station and the core of the town centre is challenging and a missed opportunity.
- 2.14 The ambition is to break down these barriers, and fully integrate active and sustainable travel, connecting the town centre to surrounding neighbourhoods, schools, employment, retail parks, healthcare and other key attractors, as well as future development and growth. This means re-imagining roads as streets for people, prioritising routes and links for walking, cycling and public transport, and creating high-quality public realm that is centred on active and sustainable accessibility.
- 2.15 Rugby is blessed with a rich historic environment, with the town centre Conservation Area covering a variety of Victorian and Edwardian assets. The town’s market heritage comes to the fore at its historic



core, specifically at Market Square. Rugby’s fine grain and tightly packed plots give it much of its character, a synergy between high quality townscape and intense commercial activity.

- 2.16 These attributes will inform new development, particularly repairing urban fabric and integrating old with new through a continuation of grain.
- 2.17 Key historic assets will be protected, enhanced and highlighted where possible and appropriate through the strategy. It will be important to protect views which contribute to the townscape, and which aid in wayfaring and navigating around the town. Opportunities will be sought to reinforce or create new views which further enhance the townscape and pedestrian orientation.
- 2.18 Although there are large parks around the edge of the town centre, the heart of the town is lacking in green space. There is an opportunity to create greener streets and spaces which could include street tree planting, improvements to existing spaces and the creation of new pocket parks and spaces for a range of activities. Improvements are already taking place to the green spaces around St Andrew’s Church, which will help set the tone for other opportunities in the town centre.



Ensuring a Delivery Focus

- 2.19 Rugby Council is committed to ensuring that Rugby town centre’s Regeneration Strategy is delivered. This is a vision and framework that will be taken forward in partnership with the private sector, wider public sector and voluntary and Third Sector to the benefit of Rugby residents and visitors for years to come.
- 2.20 Rugby Council are a significant employer and landowner within Rugby town centre and recognise the importance of their own asset and investment decision making as a result.
- 2.21 To deliver the scale of change proposed and the diverse mix of uses envisaged, there needs to be an emphasis on maximising the use of public sector assets. This will focus on the positive intensification, re-use and re-development of Council owned assets which are currently underutilised or have a key role as catalysts for leveraging wider investment and change.
- 2.22 We will ensure throughout these investment decisions that we consider environmental impact and the role for re-use and intensification via refurbishment as well as redevelopment. Circular economy principles must be maximised through each decision in the town centre, including the re-use of materials on sites which do result in redevelopment.

Regeneration strategy objectives

2.23 The vision is underpinned by a series of objectives. Sitting across the town centre regeneration programme, they capture our commitments and expectations and will inform our own and our partners decision making around development and investment to 2035.

2.24 It is intended that development and investment proposals in the town centre will be considered against these objectives, and they will form a core part of any future funding application progressed in relation to projects being delivered within Rugby town centre.

2.25 The objectives have been summarised in a table capturing its alignment with the key principles for change documented. Each principle has been broken down into a range of priorities which respond to baseline conditions noted through the process and which have been tested with the local community, businesses and stakeholders. For each priority we have identified a clear objective to guide investment.

2.26 The objectives recognise that the regeneration programme needs to capture much more than direct physical change within Rugby town centre. There is a significant existing

business and resident community which will be impacted by any change that is delivered. The Council are committed to ensuring that the benefits of change are felt by this existing community; that the programme creates greater opportunity and resilience from a social and economic perspective as a critical non-physical outcome to the process. We expect our partners to do the same working alongside us.

PRINCIPLE	PRIORITY	OBJECTIVE: Investment in the town centre will...
Putting People First	Equitable and inclusive	...be inclusive, ensuring we deliver a place that actively welcomes all of our current and future communities - reflecting cultural, economic and other barriers to access amenity and experience.
	Climate resilience	...contribute to addressing the climate emergency, modernising the existing built environment, prioritising re-use over redevelopment, and future proofing new development
Creating a Resilient Town Centre	Economic vibrancy	...secure greater resilience in the town centre economy by increasing the mix of uses, retaining a core retail offer and supporting, attracting and growing businesses within the centre
	Sustainable connectivity	...deliver a movement network that enables safe, active and sustainable localised journeys, and a step-change in mode of transport from wider communities and visitors accessing the centre
	Homes and public spaces	...deliver a balanced housing offer, innovative in design, supported by and sat within high quality and accessible open spaces and public realm
Investing in Our Physical Environment	Character, culture and heritage	...respect existing heritage by creating assets for the future, putting culture at the heart of new spaces created and existing spaces improved

Fig 8 Regeneration Strategy principles, priorities and objectives

3 OVERARCHING STRATEGY

- 3.1 The Rugby town centre Regeneration Strategy has been developed as a series of inter-connecting layers that together combine to establish an overarching framework for change.
- 3.2 Principally captured as a programme of physical projects and interventions. Combined these layers will transform the town centre, delivering against our agreed vision and directly addressing key issues and priorities identified through the process including during engagement.
- 3.3 Delivery considerations across each of the frameworks presented are considered in more detail within the subsequent section of the Regeneration Strategy.

Strategic Projects

- 3.4 Across the subsequent frameworks presented in the remainder of this section, six projects have been identified as having catalytic potential. The delivery of these catalyst projects will have significant wider impact on the town centre – either in terms of addressing market failure or growing market potential, leverage private sector investment and enable a greater scale of change, or materially positively improve the way people use and access the town centre.
- 3.5 Some of these projects, subject to securing / resolving funding and finalising a delivery strategy, are within the gift of the Council. Others will require partnership working to unlock.



Fig 9 Six key strategic projects - set out on the following pages

RUGBY HUB



- 3.6 Rugby Council are the largest single employer within Rugby town centre. Their main office is located at the Town Hall on Evreux Way. The Town Hall houses Council services including Council Tax and benefits, waste services, environmental health, sport and leisure, parks and open space, parking services, housing and planning.
- 3.7 Alongside the preparation of the Regeneration Strategy, Rugby Council have been undertaking a review of their office requirements in the future. This review has considered long term market changes around office occupation, and the gradual shift to greater flexibility in working patterns and habits. It has also, given its timing, been able to reflect on the impact of the COVID-19 pandemic on those changing working patterns and habits.
- 3.8 The outcome of this initial accommodation strategy has identified that the Council could reduce their floorspace requirement from 55,000sqft to 30,000sqft, without reducing employment levels.
- 3.9 In parallel to this process, Rugby Council have been engaging with their wider public sector partners to establish the potential to create a 'Rugby Hub' – a centrally based location from which multiple partners operate within the Town Centre. This has included engagement with South Warwickshire NHS Foundation Trust in relation to NHS run activities within Rugby at both Hospital St Cross and Webb Ellis Industrial Estate, Coventry and Warwickshire Clinical Commissioning Group in relation to health facilities including GP surgeries, the Department for Work and Pensions in relation to the Job Centre on Albert Street and others.
- 3.10 In addition, and as part of the scope of the project the Council are reviewing and ensuring a long-term strategy is in place in relation to both Benn Hall and the Rugby Art Gallery and Museum (RAGM) – both of which are key assets as part of any future visitor and cultural strategy for the town centre.
- 3.11 This Regeneration Strategy is being funded via a grant secured through the Government One Public Estate programme. Its overarching strategic objectives are to:
- Provide a long-term solution to Council accommodation to meet operational needs;
 - Promote and enable town centre regeneration;
 - Encourage partner investment in the town centre; and
 - Leverage wider public sector involvement, streamline service provision and meet community needs as much as possible.
- 3.12 At the time of writing the Rugby Hub project is still evolving as a concept. Alternative delivery options are being explored including the testing of the extent to which a full public sector hub can be achieved, timing of partner decision making, funding and delivery strategy, and potential locations. The Council is exploring finding a solution to its accommodation requirements as part of this process and independently if required.
- 3.13 The Regeneration Strategy process has considered a range of alternative locations where a Rugby Hub development could be accommodated – whether delivered by Rugby Council alone, or in partnership with the wider public sector. This has focused on assets owned by the Council within the town centre.
- 3.14 The Regeneration Strategy concludes that the two most likely options for future accommodation of the Hub within the town centre are:
- Option 1 – Remain on the existing site at Evreux Way, either through investment in the existing Town Hall to improve office accommodation and house partners in-situ including the potential release of the Police Station on North Street for development purposes; or
 - Option 2 – Relocate from the existing site at Evreux Way and develop new accommodation on North Street Car Park – to accommodate either the Council alone or Council plus wider partners subject to agreeing commercial terms and delivery strategy. Under Option 2, a long term future for Benn Hall would need to be defined, and the balance of land at Evreux Way would be released for development purposes. The Regeneration Strategy identifies RAGM as a potential relocation opportunity for Benn Hall if required. This is considered in more detail in the later High Street Character Area analysis.
- 3.15 The uncertainty around the strategy for Rugby Hub at the time of writing means that the Regeneration Strategy cannot be conclusive in identifying where it will be delivered and the impact that will have on the wider town centre regeneration process.
- 3.16 It is clear that the delivery of the Rugby Hub, whether on the existing site or North Street car park, will be a major footfall driver for the town centre. It is extremely important the Council's footfall is at least retained within the town centre to drive the future regeneration process.
- 3.17 The Regeneration Strategy does however note that there is the potential for the extent and nature of impact to differ across the alternatives presented.
- 3.18 Within Option 2 specifically, the delivery of Rugby Hub at North Street car park would be instrumental towards creating a new focal point / anchor for the town centre. It has the ability to tie in with the redevelopment of Rugby Central across North Street, especially if delivered in conjunction with the proposed improvements to North Street, and transform the animation and activity in that location.
- 3.19 Any increase in employees within that location, will help to support the lunchtime and evening trade enabling growth of new food and beverage, leisure and retail uses coming forward in the immediate vicinity.
- 3.20 New public realm including a pocket park, could come forward and enhance the area for both employees, visitors and the wider community. This would create an attractive commercial location, that could support the delivery of new flexible workspace to compliment the offer.
- 3.21 Option 2 would also include the release of land for development purposes at the existing Town Hall site.

RUGBY MARKET



3.22 Rugby Market is a twice-weekly (Friday and Saturday) outdoor market at the heart of Rugby town centre (situated at Market Place, top of the High Street) offering a wide range of Bric-a-Brac and locally-produced produce at good value. Additionally, a Farmer's Market is held on the last Thursday of every month, focusing on fresh produce and baked goods.

3.23 There are up to 22 stalls, with the Market jointly run by the Rugby First (BID) and Rugby Council.

3.24 The Council are currently in the process of letting a new contract for management of the market. Within the scope of works, there is the potential for a new market concept which could include relocation of the market to a new permanent home (including need to explore balance of covered and uncovered space), and potential evolution of the market to include food and drink uses.

3.25 The Council have commissioned a survey (July 2022) to understand key elements of the town centre. As part of this, a series of market-related questions were posed to inform the future vision for the market. To summarise, over 50% of the respondents do frequent the market, and c.40% do want the market to operate twice a week. Predominantly, if the market were to be expanded, residents were keen for the new market to include a greater food and beverage (c.40%) and specifically a street food offering (c.20%). There was additionally a keenness for a speciality Farmers market to be part of the new offer (c.68%). The key take-away therefore

being that the market is a valued part of the Rugby town centre offer, but the offering should be diversified to attract more people and more spend.

3.26 It is assumed that a new Rugby Market will be delivered at some point in the future as part of a strategy to ensure its long-term viability, enhance its contribution to the centre and encourage visitors to the centre alongside a diversified offer. Whilst any such process should be managed carefully, a new market offer could be an important part of the retail and experience mix in Rugby town centre in the future, specifically a strong contributor to the future events programme.

3.27 Aligned to above, there are three potential options identified – all which will seek to deliver a sustainable long term market proposition within the town centre:

- Option 1 – Remaining on existing site at Market Place as an outdoor market, with potential to increase in size to 30-40 stalls, allowing for the potential activation of Sheep Street pedestrian area.
- Option 2 – Relocated to North Street car park as an indoor or outdoor market at the larger capacity of 30-40 stalls, potentially alongside / as part of a Rugby Hub development.
- Option 3 – Relocated to Gas Street car park as an outdoor market at the larger capacity of 30-40 stalls. Under Option 3, there is an opportunity to consider an additional indoor market to accommodate part of the stalls.

This would be subject to further detailed ground contamination studies, which could inform whether an indoor market could be constructed on the site.

3.28 The market will continue to be a footfall driver, regardless of where it is located. However, a more diverse market offer, to include for example a greater food and beverage offer, farm produce or seasonal goods, could be a more compelling driver in terms of greater footfall and animation. It is important that the Strategy for the town centre identifies the best location to drive this activity. The market will also form an important part of the meanwhile strategy to animate key locations supporting phased change across the town centre.

3.29 Based on community engagement undertaken there is a strong support and rationale for retaining the market at Market Place. Unlike the other two options, it would help to create opportunities for commercialisation of pedestrian areas and help to reduce vacancies in the traditional retail units with the core. This should however include investment to improve and expand the market offer as an important anchor for the Sheep Street / High Street area of the town centre.



Fig 10 Rugby Market

ROUNDS GARDENS



3.30 Rounds Gardens is a Council-owned housing estate comprising 221 flats across three blocks. It accounts for over 5% of the Council affordable housing accommodation. Rounds Gardens is situated north-west of Rugby Central Shopping Centre and is nestled within a predominantly residential area and although close to the town centre, it is physically separated by the road network, leaving the community isolated.

3.31 Over the last two years, the Council have been working towards approving a project to regenerate the estate. The Council are preparing development plans and have commenced deconstruction of the high rise flats and low level homes in their ownership. In line with the estate renewal process, existing tenants were re-housed to allow for vacant possession.

3.32 The demolition of the existing properties is due to complete in winter 2023. Thereafter, the development of new homes will commence (subject to securing planning permission) with a completion in around 2026.

3.33 The redevelopment of Rounds Gardens has the potential to improve and diversify the residential offer, the immediate public realm and, influence greater change across the town centre. Given where it is positioned, redevelopment proposals could 'open' up the area and create an improved interface into Corporation Street West residential area. The development proposals could link into the rationale for downgrading Corporation Street West (another Catalytic project), helping to

improve permeability, and addressing the severance issue. It would have a knock-on impact and ability to link into wider Regeneration Strategys for Rugby Central, to deliver new routes though to Rugby Central, and the through to core town centre locations (e.g. North Street to Regent Street areas).

3.34 If successful, it could help to greatly improve the landscape and environment for Rugby residents and be a catalyst to improve the housing stock within Corporation Street West.



Fig 11 Example of high quality residential development

RUGBY CENTRAL



3.35 Rugby Central Shopping Centre (formerly known as The Clock Tower Shopping Centre) was bought in early 2021 by Karenor Partners Ltd. Since that time, through asset managers Running Hare, investment proposals have been developed and tested with the local community – with a Phase 1 planning application currently lodged with the Council for determination.

3.36 The vision for the Phase 1 delivery is to revamp the offer at Rugby Central to align with shifting shoppers' retail habits. This includes space to accommodate a more diversified operator mix with greater food and drink and leisure uses, rather than traditional high street retail.

3.37 The proposed Phase 1 project seeks to redevelop the eastern entrance and shopping parade, delivering new improved retail units, a new entrance and gateway along North Street and two blocks comprising 210 flats (this may be subject to change). The vision is to create a new 'image' for Rugby Central that is attractive, vibrant and drives footfall during the day and night-time.

3.38 Later phases of delivery at Rugby Central are less clear at the current time in terms of their scope or delivery programme. The Regeneration Strategy highlights the significance of east-west connections through the Rugby Central area and envisages a Phase 2 delivery programme would include the long-term redevelopment of the Rugby Central car park and the now vacant Cemex site to improve both frontage to and connectivity across Corporation Street.

3.39 There is important interface between Phases 1 and 2 of Rugby Central and a number of critical infrastructure projects. This includes Corporation Street, North Street and the junction at Evreux Way. The Regeneration Strategy proposes significant simplification of these important movement corridors – making them more usable for pedestrians and supporting improvements to east-west connectivity. At the Evreux Way junction, by delivering a signalised junction in place of the existing roundabout, it is intended that better development form, and more prominent and active frontages can be created on gateway sites including the Town Hall and former Cemex offices.

3.40 The redevelopment of Rugby Central will have a significant impact on the town centre. It is considered necessary that traditional retail floorspace is contracted within the centre as part of the delivery programme. The proposed Phase 1 delivery is a positive strategy for not simply contraction but replacement of space that can diversify the offer and therefore generate footfall in the core area.

3.41 Linking to the proposed Rugby Hub redevelopment, it could support creating a more attractive offering for employees and visitors to the town centre, through provision of evening-orientated uses. It will help to create a more attractive environment for future commercial schemes (particularly if focused around North Street). More widely, the redevelopment helps to address some of the gateway and movement issues around North Street.

3.42 The Council's ambitions as established within this Regeneration Strategy are to realise the full potential of Rugby Central through the ultimate implementation of both phases of the project.

3.43 Key priorities are illustrated on the indicative sketch as follows:

1. Strengthen North Street frontage in parallel with improvements to North Street environment.
2. Transform frontage and activity on Corporation Street.
3. Strengthen east-west connections to western side of Corporation Street.
4. Create legible streets and spaces which enhance north-south and east-west connectivity at Rugby Central.
5. High quality development to transform Evreux Way.
6. Improve linkages to Town Hall site.
7. Enhance connections to Rugby Art Gallery and Museum, and High Street.

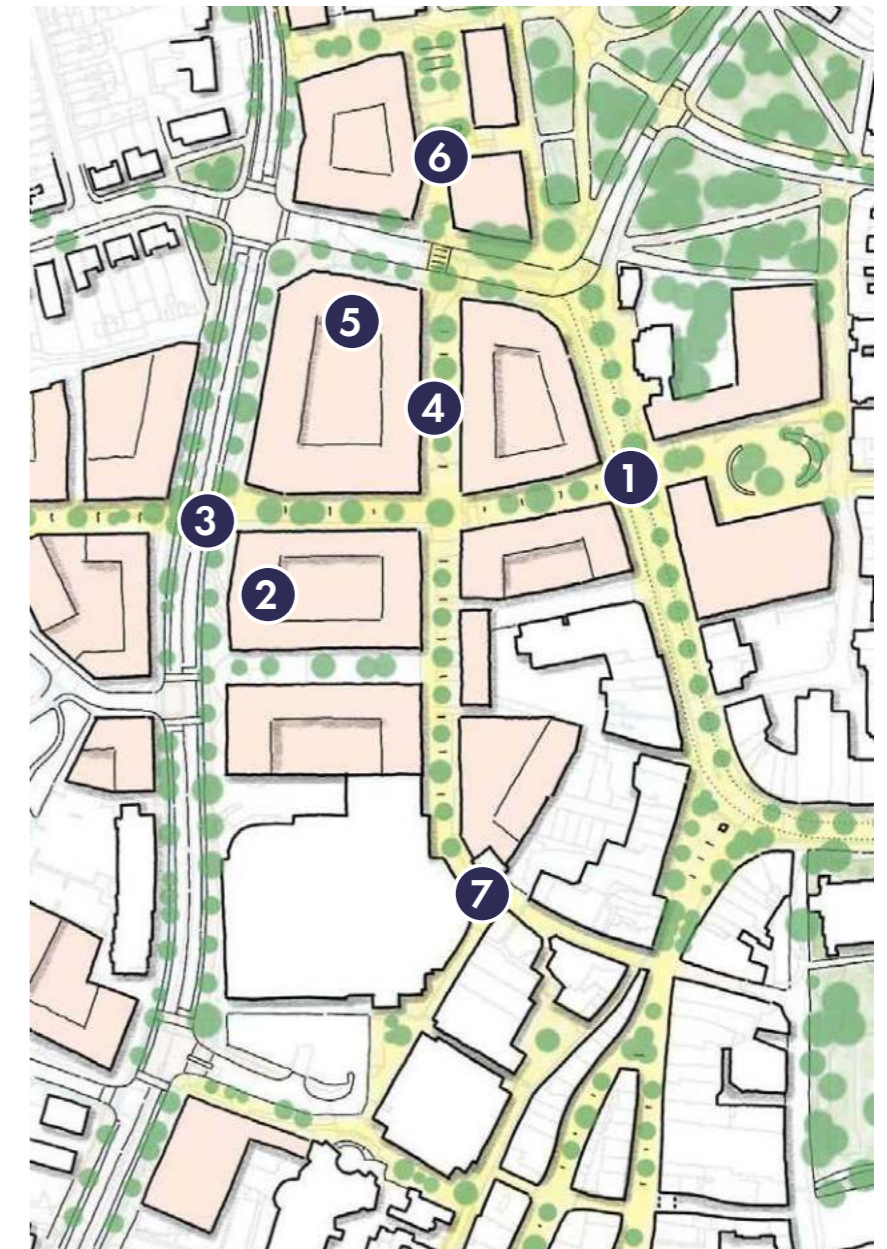
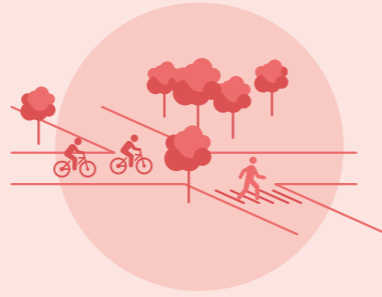


Fig 12 Illustrative proposals for Rugby Central

REIMAGINING EVREUX WAY AND CORPORATION STREET



CHURCH STREET / NORTH STREET



3.44 This is an important project that will improve the connections between the core retail area and the wider neighbourhoods including Council-owned assets and Round Gardens, through a relatively hostile and disjointed area of the town centre. The proposed works will enable significant opportunity to create active and positive frontages on key sites including the Town Hall and former Cemex site. If delivered alongside those wider strategic projects this is a hugely significant and radical project that will completely change the western side of the town centre, increasing permeability, accessibility and an important arrival point for the local community and visitors.

3.45 Currently Corporation Street and the Evreux Way roundabout are designed to facilitate vehicular access and movement through, rather than to, Rugby, at the expense of the safe and convenient movement of pedestrians, cyclists, buses and local access.

3.46 Evreux Way roundabout and the large expanses of carriageway take up valuable public space which could be better used to unlock more sustainable development with active frontages, improve the local environment, and importantly address the severance that these environments create. That severance impedes people in surrounding neighbourhoods from accessing their town centre by active and sustainable travel modes.

3.47 The ambition is to reimagine Corporation Street as a street for people and create a high quality northern gateway environment at the Evreux Way junction. This can be achieved through the reallocation of road space and re-designing of the Evreux Way roundabout, ideally replacing the roundabout with a compact signalised junction. This would create a more permeable, accessible and enjoyable arrival to Rugby town centre for all visitors including pedestrians, cyclists, buses and taxis.



Fig 13 Illustrative proposals for Corporation Street and Evreux Way, including the removal of the roundabout

3.48 Key priorities for Corporation Street are illustrated on the sketch plan above:

1. Convert Evreux Way roundabout to a signalised junction and create high-quality gateway to Rugby town centre.
2. Strengthen east-west connections between Rugby Central and key sites west of Corporation Street.
3. Reallocate road space on Corporation Street to create a street environment for all.

3.49 Church Street and North Street are the backbone of the town centre, however they suffer from a number of issues, including closed shops, poor quality buildings, significant street clutter, as well as conflicting movement and placemaking needs. The current road layout, as well as bus and taxi arrangements cause difficulties for everyone and negatively impact on the sense of place and heritage. The environment lacks street greening, pedestrian crossings and rest places to enjoy the town centre.

3.50 The ambition is to create an environment where local culture, communities and everyday economies can come together. An environment where sustainable living, working and active travel are fully integrated. Where health and well-being, heritage and environment are celebrated and accessible to all.

3.51 This can be achieved through the creation of a high-quality public realm scheme that puts people and placemaking at its heart. A space that enables everyone to move around safely and enjoyably by sustainable and active travel.

3.52 The roads should be replaced with streets for people supported by high quality public realm and greening. The designs should provide for an efficient 21st century bus system, as well as address parking and taxi provision to enable a fully accessible, welcoming environment for all. The designs need to have flexibility in mind to ensure these important streets continue to have resilience to future economic, social and climate change.

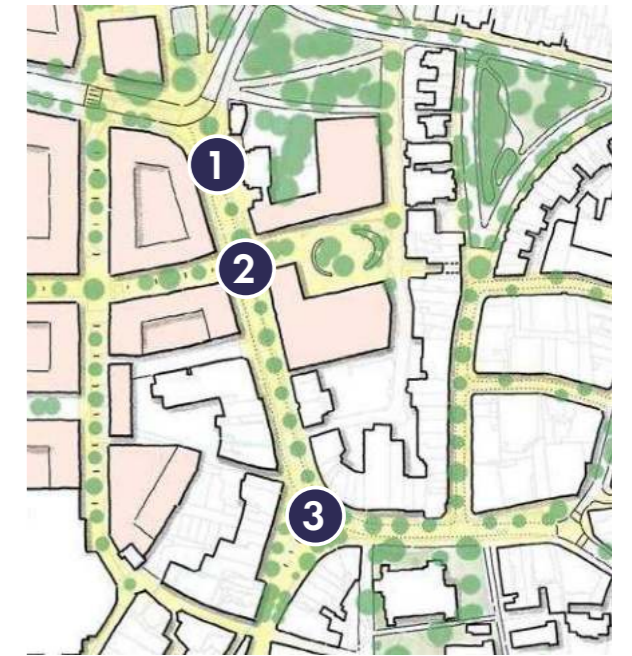


Fig 14 Illustrative proposals for Church Street and North Street

3.53 Key priorities for Church Street and North Street are illustrated on the sketch plan above:

1. High quality town centre public realm scheme on North Street and Church Street, and adjoining streets and alleyways.
2. Strengthen east-west linkages between Rugby Central and Regent Street area and beyond.
3. Create more attractive and welcoming threshold between High Street and North Street / Church Street.

Movement Framework

The Existing Situation

- 3.54 Rugby town centre is well connected by road, including proximity to the M1, M6 and M45. It is also very well connected by rail, with connections to Stafford, Birmingham, Glasgow and Edinburgh, as well as London Euston in only 48 minutes. There is a comprehensive bus network which provides good connectivity during the day, and a large proportion of the town centre is very walkable and easy to cycle around due to its flat terrain.

The Challenge

- 3.55 The town centre faces a number of transport and movement challenges that require careful consideration, to ensure Rugby continues to support, and lead the way with sustainable and active travel. The main challenges are as follows:

RESPONDING TO FUTURE DEVELOPMENT AND GROWTH

- 3.56 Significant growth and development is planned around Rugby, therefore it is important that existing communities and future generations continue to have access to high quality and sustainable transport choices including rail and buses, as well as well-connected, safe and convenient walking and cycling routes.



CLIMATE EMERGENCY

- 3.57 Both the County and Borough council have an action plan in place to get to net zero carbon by 2030. It is important that the movement framework responds urgently, proactively and with innovation to this climate emergency target.

HEALTH AND WELL-BEING AND ECONOMIC RESILIENCE

- 3.58 Rugby Borough Council and Warwickshire County Council have set ambitions to improve the health and well-being of its people as well as to make local economies more resilient to future change. The County Council has also developed Local Walking and Cycling Plans (LCWIPs) and Bus Improvement Plans (BIPs) in line with Government policy. It is important that the Rugby town centre movement framework fully supports and builds on these plans and policies to deliver holistic, flexible, active and sustainable active and sustainable travel measures.

TOWN CENTRE PHYSICAL CHALLENGES

- 3.59 There are significant barriers resulting from the highway infrastructure that surrounds Rugby including the A426, Rugby school gyratory / A428, Corporation Street and Evreux Way roundabout, as well as the railway tracks to the north. Severance caused by this infrastructure needs to be addressed to enable greater provision and access to active and sustainable travel choices.

- 3.60 There is a need for high-quality streets and spaces within the town centre that meet peoples' needs, including health and wellbeing, and where active and sustainable travel is a priority over the private vehicle.

- 3.61 Rugby station needs to be sustainably integrated with the town centre and wider area through excellent walking and cycling routes as well as a reliable, well-connected and accessible bus network.

FUTURE TRANSPORT AND TECHNOLOGY

- 3.62 There is a need to be forward looking to ensure Rugby is at the forefront of transport innovation and technology, ensuring people have excellent access to sustainable travel choices.

Proposed Framework

3.63 This section sets out the ambition, framework for change and key projects to help deliver a sustainable, well-integrated and connected town centre to 2035. A town centre where walking, cycling and using public transport is second nature and accessible to all. The framework has been developed through detailed consideration of planning policy, leading best practice, stakeholder and community feedback, issues and opportunities identification.

Our Ambition

1. A phased shift from highly trafficked, engineered roads and junctions to streets and spaces that prioritise safe and convenient walking, cycling and public transport access including re-designing Corporation Street and Evreux Way roundabout from roads to streets.
2. The creation of a town centre that is fully integrated with existing and future surrounding neighbourhoods, employment and leisure facilities by sustainable and active modes of transport, including rail, bus, walking and cycling. This includes the creation of new routes and spaces as part of future development.
3. The development of a 21st century public transport system including significant changes to the bus network and Rugby station environment to support a network which is zero-emission, reliable, legible, safe and fully accessible to all during the day and night time.
4. A parking, deliveries, servicing and taxi system that prioritises disabled users, zero or low-emissions vehicles, including bicycles, e-bikes, e-cargo bikes, scooters and electric vehicles. A system that is efficient, supports the local economy and balances the needs of other users and uses.
5. Regeneration, growth and development that is founded on car-free or car-lite principles and supported by high quality walking, cycling, micro-mobility, bus and taxi infrastructure.

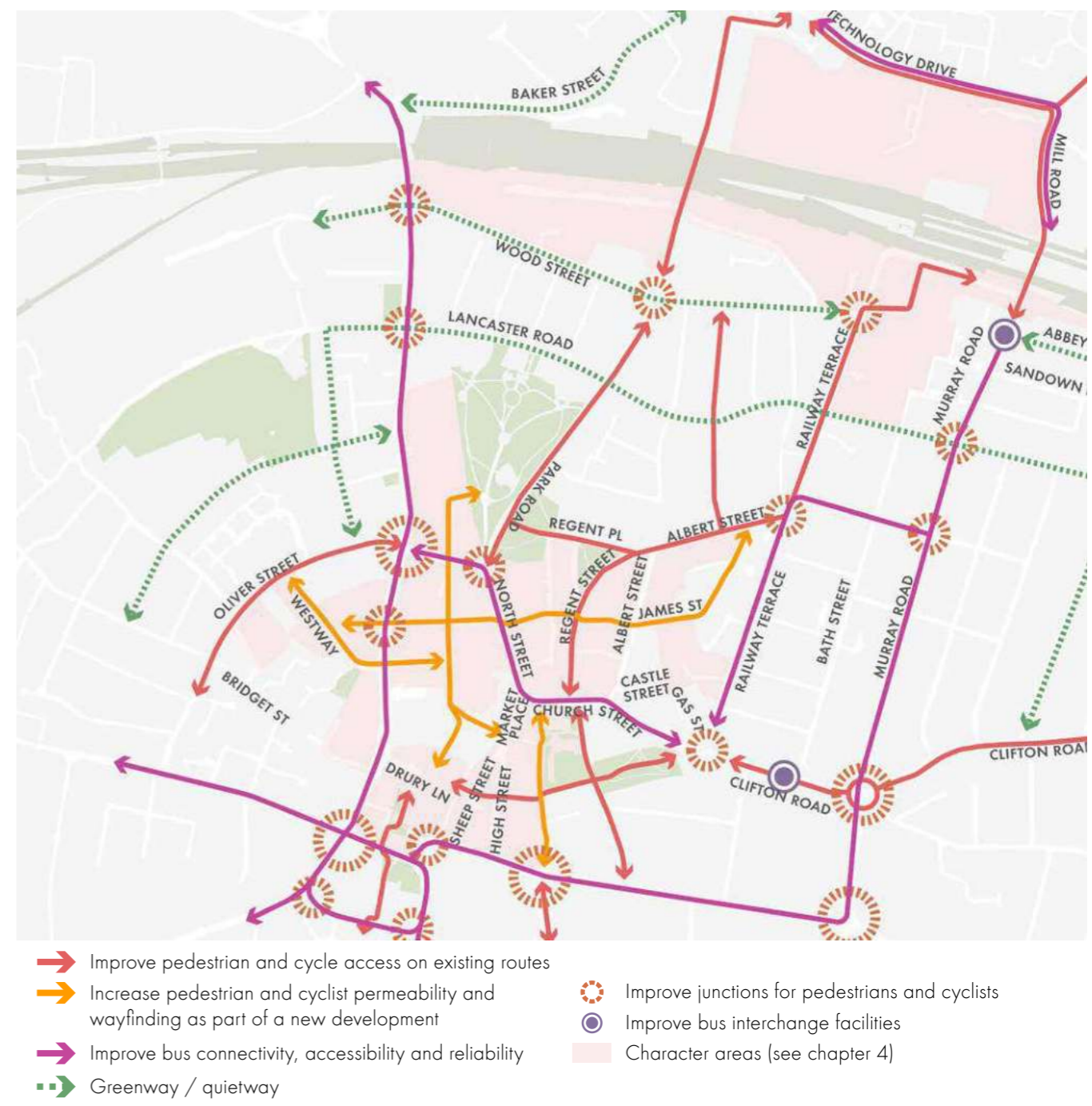


Fig 15 Town centre movement framework



Fig 16 An integrated approach to movement and public realm is vital

Key Transport and Movement Projects

STREETS FOR PEOPLE

- 3.64 The conversion of Corporation Street, Evreux Way roundabout and Rugby School gyratory to streets for people, where walking, cycling accessibility, junctions, crossings and bus accessibility are significantly improved.

HIGH-QUALITY TOWN CENTRE STREETS AND SPACES

- 3.65 The introduction of high-quality public realm on North Street, Church Street, High Street and Sheep Street that creates an enjoyable, accessible space for people to enjoy both during the day and night time, and importantly support an efficient 21st century bus system, high quality walking and cycling facilities, public realm and greening. Ensuring these spaces are fully integrated with the wider neighbourhoods by walking and cycling, buses, appropriate taxi provision, and the identification of new streets and spaces as part of development and car parking release.

WELL CONNECTED NEIGHBOURHOODS

- 3.66 Addressing barriers caused by the A roads and railway tracks including crossings and junction improvements to better integrate existing and future neighbourhoods to Rugby town centre. The creation of dedicated quietways, greenways, and bus route and service improvement measures to link the town centre with the station, retail parks, schools, health centres, existing and future residential areas.

21ST CENTURY PUBLIC TRANSPORT

- 3.67 The creation of a high-quality station environment and integration of Rugby station with the town centre and wider area by bus, walking and cycling. Supporting an efficient bus system that is accessible, reliable, affordable and flexible providing excellent connectivity between the town centre, surrounding neighbourhoods, key attractors such as the retail park, and the wider region, including proposed growth and development areas. Multi-modal hubs could be considered in suitable central locations that enable visitors to interchange between buses, cycle hire and obtain up-to-date travel information, Wifi and local maps.

Car Parking in the Town Centre

- 3.68 Parking provision has a clear role in supporting flexible car-based access to the town centre and will continue to be an important mode of transport in the future.
- 3.69 Across the movement framework the aims are to:
- Better balance the needs and priorities for car parking with the requirement for greater public space over the short, medium, and longer term
 - Enable more sustainable future development and creation of high-quality public space
 - Support strategic objectives including reducing the impacts on climate change, air quality and improving health and well-being.
- 3.70 The movement strategy advocates the need to intercept cars before they enter the town centre through signing, access improvements and the relocation of car parks to the periphery. Providing high-quality car parking at appropriate locations, which prioritise facilities for disabled users, cyclists, electric charging points and delivery hubs, where appropriate. Supporting local businesses with the development of more sustainable delivery mechanisms including electric vehicles, cargo bikes, click-and-collect and last mile delivery hubs.
- 3.71 As with many other towns and cities, balancing parking provision with other aims and needs is complex and that has been further

complicated by the Covid-19 pandemic which has modified travel mode choices, perhaps permanently. As such, future development and / or changes within Rugby will need to respond cautiously and responsibly to pandemic impacts, weighing up the need to revitalise the town centre with the health, well-being, equality and climate change considerations.

- 3.72 See overleaf for the principles of change that have been identified to help support more positive vehicle trips and associated parking within the town centre over the long-term timeframe of the framework and beyond:



Fig 17 Precedent images highlighting a range of initiatives to support the movement framework

1 OPTIMAL STAY

3.73 Making best use of existing key retained town centre parking assets in the short term, for all stay durations and purposes. This should include consideration of the rationalisation, relocation and removal of parking locations and types to encourage change in travel behaviour. Enabling a coordinated parking regime that encourages more visitors to stay, shop and enjoy the town centre for longer, and reduce the impact of vehicles on the local network. This could include the use of technology to optimise space availability, wayfinding signing, easy to use ticketing systems, and high-quality pedestrian routes to and from the facilities. In the medium to longer term, interceptor car parks should be considered to interceptor vehicles prior to them entering the town centre, and in doing so reducing the negative impacts of vehicles on the local environment including the public realm.

2 ALTERNATIVE TRAVEL MODES

3.74 Providing effective sustainable travel mode alternatives to the private car. It is important that any changes to car parking including rationalisation, relocation and removal goes hand-in-hand with measures to improve access to alternative, more sustainable modes of transport. Greater emphasis and incentives to use buses including changes to car parking tariffs to encourage this shift also need careful consideration.

3 PLACEMAKING

3.75 Minimising the impacts of town centre on-street and surface car parking on the streetscape and local access and strategic movement. Helping to create more vibrant, inviting places for people and for businesses to undertake deliveries and provide outdoor dining / trading space. This may include the redesign of streets and surface car parks, introduction of greening and standardised ticketing systems.

4 PRIORITISING DISABLED USERS AND SUSTAINABLE VEHICLES

3.76 Where parking is provided, ensuring that disabled users and sustainable vehicles including disabled parking facilities, electric vehicles and car clubs bays are prioritised. Such parking will need to be carefully located and designed to ensure they are appropriate for use. Well located, safe and secure parking for cycles, e-scooters and e-cargo bikes should also be considered. It is also important that, where possible, appropriately located taxi ranks and greater support for low-emission taxi services are considered.

5 CAR-LITE AND CAR-FREE DEVELOPMENT

3.77 Supporting and enabling future development and growth that prioritises sustainable transport modes and access whilst also making appropriate provision for car use and access.

6 SUPPORTING LOCAL BUSINESSES WITH SUSTAINABLE CHOICES

3.78 Work with businesses to help reduce employee and visitor trips by vehicle and support them with more sustainable delivery choices including e-cargo bikes, electric cars, local delivery hubs and click-and-collect facilities where appropriate and feasible.

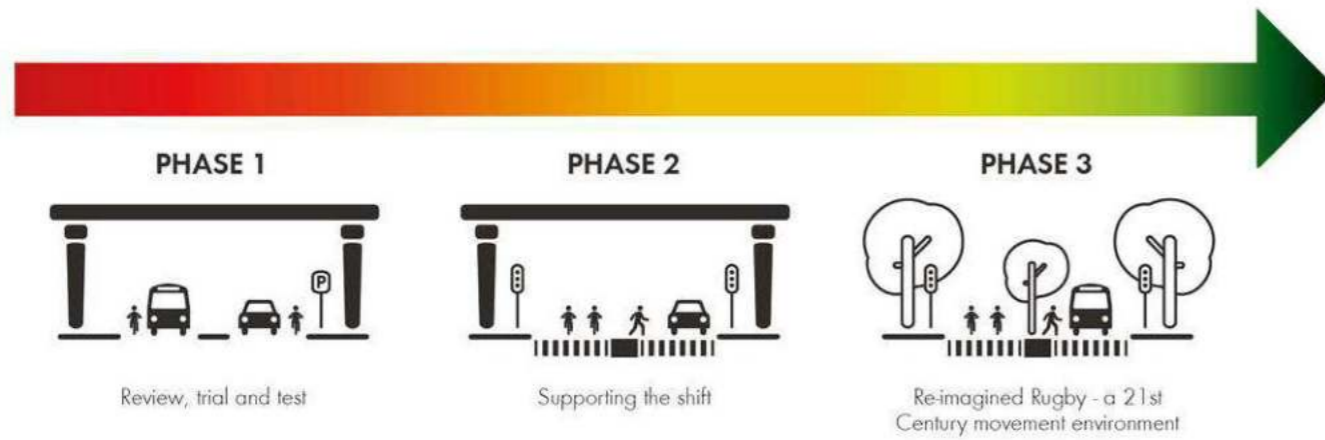


Fig 18 Phased approach to movement for Rugby

A Phased Approach

3.79 It is recommended that a phased approach to achieving the ambition is undertaken to ensure fully sustainable change can be achieved, making the best use of resources that are available, with strong community support and leadership.

3.80 A phased approach to change will help ensure local communities and businesses are able to adjust whilst projects and supporting development is planned, consulted upon and delivered. The transport, movement and parking framework for change will be targeted specifically to enable and support the wider town centre masterplan development and public realm framework objectives.

PHASE 1: REVIEW, TEST AND TRIAL

3.81 It is during this phase that the masterplan proposals are discussed and developed further. Working alongside the community and key stakeholders, some proposals may be trialled and tested such as changes to traffic management, meanwhile uses on car parks and introduction of parklets in car parking spaces, with amendments made in response to the trial outcomes.

3.82 It is also during this stage that some lower cost, lower risk projects could be implemented, including neighbourhood pedestrian and cyclist route improvements, wayfinding, signing and lighting measures.

3.83 Others may include town centre visitor information as well as localised pedestrian crossing, public realm and cycle parking measures. Innovative and sustainable modes of transport such as e-bikes, e-scooters and on-demand bus services may be trialled for local community and business delivery use.

PHASE 2: SUPPORTING THE SHIFT

3.84 This phase takes the tests and trials from phase one forward to permanent interventions. The nature of streets and spaces are reconsidered, with a much greater shift towards the re-prioritisation of movement and placemaking needs within the town centre and surrounding neighbourhoods. This requires the planned relocation of some movement functions out of the town centre.

3.85 This phase also sees the more challenging projects being implemented, including junction improvements, additional pedestrian crossings, bus lanes, cycle lanes, and the rationalisation and redevelopment of some of the surface car parks to support greater uptake of more active and sustainable transport modes as well as significantly improve the quality of the public realm. As this mode shift progresses, then parking provision for development moves further to car-lite and car-free with car parking to the town centre's periphery, enabling greater public realm and green space to be provided. The car parking changes will be accompanied by further improvements to walking, cycling, bus routes and services and greater rail station integration.

PHASE 3: RE-IMAGINED RUGBY - A 21ST CENTURY MOVEMENT ENVIRONMENT

3.86 With the people-focussed movement and placemaking principles established and initial measures trialled, tested and proven, this phase sees more significant changes to infrastructure, deepening the emphasis on local access over strategic movement, through substantial changes to the road network. One such project could be the re-design of the Rugby School gyratory to create greater space as well as safe and convenient access for pedestrians, cyclists and buses. Surface car parks are redeveloped and replaced with interceptor car parks in this phase. These interceptor car parks will be positioned on the outskirts of the town centre, intercepting cars before they arrive in the town centre, and are fully integrated with bus services, cycle hire, and prioritise disabled and low emission / electric vehicle parking.

3.87 It is during this phase that bus routes will be streamlined and efficient. Bus services will be fully accessible, legible and reliable, incorporating leading-edge technology. Low emission and where appropriate on-demand 'hopper' buses will provide greater local coverage improving access for all and benefiting surrounding villages, the local environment and air quality. Rugby Railway Station would be a 21st century station with integrated buses, walking and cycling facilities and high-quality public realm.

Public Realm and Open Space Framework

Existing public realm

- 3.88 Rugby is served by a range of green spaces. The largest of these, to the north of the town centre, is Caldecott Park which serves communities in the north of the town and provides a range of facilities on site. Close to the park are the smaller public green spaces of Jubilee Gardens and Chestnut Field. The south of the town has a wider range of less formal public open spaces, including recreation grounds and Rokeby Open Space which follows the Sow Brook. Much of the green space in the south of the town forms part of the Rugby School as sports fields, pitches and courts.
- 3.89 The town centre generally has good access to open space provision that is over 2 hectares in size (e.g. local park size), although some areas are deficient. Expanding the Borough's Green Infrastructure Strategy (as identified in the Local Plan) into the town through Caldecott Park would help unlock key development opportunities, particularly for residential uses which rely on public open space as a source of amenity, especially in high density schemes. This would also help soften the hard, grey landscape found in the west of the town centre, along Corporation Street.
- 3.90 Analysis of Urban Greening Factor during the baseline phase of work demonstrated that the town centre has a deficiency of green space, with opportunities to improve both the quality and quantity of planting and green space within the town centre.

- 3.91 Key benefits of securing a higher index score include:
 - Healthy living
 - Mitigating flooding
 - Improving air and water quality
 - Cooling the urban environment
 - Encouraging walking and cycling enhancing
 - Biodiversity and ecological resilience

Drivers for change

- 3.92 A number of factors have placed even greater emphasis on the importance of the public realm:
 - The pandemic has transformed the perception of the role of public and green spaces in town and city centres. The Town Centre must have high-quality public realm that meets the needs of local users and visitors. It is widely acknowledged that access to green space has significant benefits (Improving Access to Greenspace, Public Health England, 2020).
 - Rugby town centre is likely to experience an increase in residential population in the coming years. The public realm must meet the needs of new residents and support health and well-being.
 - The onus is on the town centre to attract visitors over convenient out-of-town retail parks or online shopping. The public realm has a vital role to play in creating an enjoyable retail experience.

- In 2019, the Council declared a climate emergency, and recently published a draft Climate Change Strategy and Action Plan which sets out the approach and actions required to meet the net zero by 2030 target. The public realm has a key role to play in contributing to the delivery of these targets.

Key principles

- 3.93 In parallel with the movement strategy and development opportunities, we have developed an emerging public realm framework. This focuses on improving Rugby as a connected, green place, with an emphasis on:
 - Creating high quality streets and spaces.
 - Enhancing arrival and connections for residents, workers and visitors.
 - Establishing a greener character including street tree planting to aid climate resilience.
 - Integrating water management, biodiversity, air quality priorities as part of healthy streets and spaces.
 - Enhancing existing spaces and establishing a connected network of walkable routes.
 - Creating new urban green spaces.



Fig 19 Illustrative views showing green links along good quality public realm, AAM

Public realm framework

3.94 These principles have informed the development of a spatial framework for the public realm. The Strategy incorporates a number of key priorities:

1. CREATING A CONNECTED PLACE

3.95 The movement framework establishes a clear vision and route map to achieving a well-connected and accessible town centre. The public realm framework has a key role in supporting this approach, establishing a legible, attractive location:

- Down-grading the primary streets which run through the central parts of Rugby to create a more people-friendly environment which is less dominated by vehicles including Corporation Street, Evreux Way, North Street, Church Street and the gyratory system.
- Creating improved east-west and north-south connections across the town centre which knit key destinations and character areas together including several key development sites.
- Improving existing public spaces, and finding opportunities to create new spaces, including greening where possible.
- Enhancing the connection between the town centre and the railway station, offering more legible, greener routes with better wayfinding for pedestrians and cyclists.

2. INTEGRATED APPROACH TO GREEN INFRASTRUCTURE

3.96 The public realm framework is a cornerstone of an integrated approach to Green Infrastructure in the town centre.

- Introducing high-quality, robust planting and retaining high value and mature trees should be a priority for Rugby's public realm enhancements.

- Use planting to encourage investment in streets and public spaces, joining different developments through a connected and green public realm.
- Utilise planting to reinforcing key routes through the town centre and improve connections between open spaces.
- Trees can transform the character of a space or street. Tree planting in the town centre should be bold and contrasting. Trees should carefully selected in response to microclimate and planting conditions with adequate investment in the tree pit and underground infrastructure to ensure healthy growth.

3. INTEGRATED APPROACH TO GREEN INFRASTRUCTURE

3.97 A principal consideration for the public realm framework is the management of water and mitigation of surface water run-off.

- National planning policies strongly recommend Sustainable Urban Drainage Systems (SuDS) for managing surface water runoff. In order to address the dominance of impermeable surfaces SuDS should be integrated into the design of the town centre public realm wherever practical, on a street-by-street, and site by site basis.
- SuDS features also present an opportunity for increased biodiversity, visual interest, the provision of seating, and integrated play. A range of features could form part of the approach to SuDS including trees, low-level planting, rain gardens, swales, channels and permeable paving. Features should be carefully integrated to avoid obstruction of pedestrian movement, and carefully considered in relation to the associated management and maintenance regime.

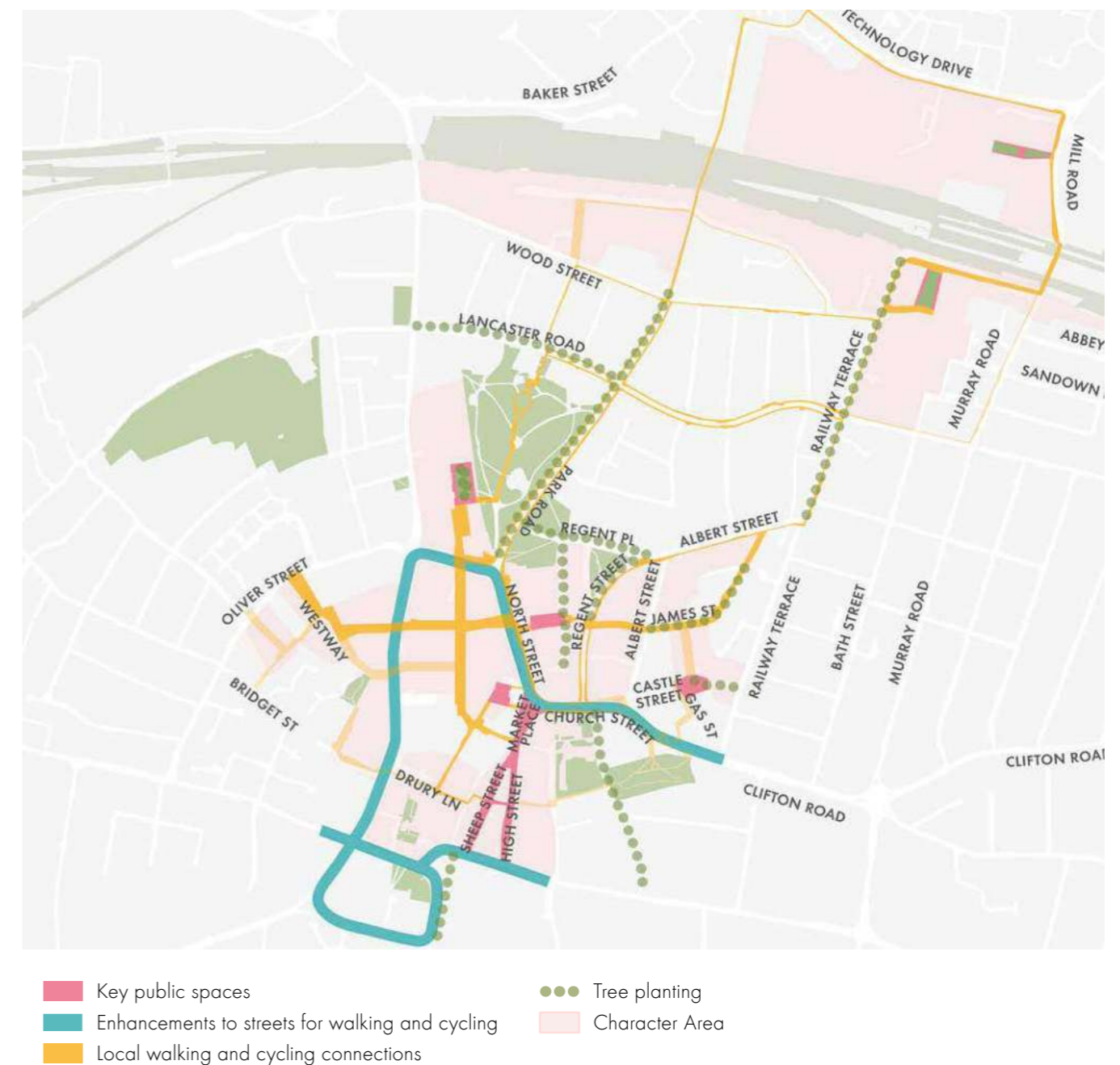


Fig 20 Public realm framework



Illustrative public realm masterplan

3.98 The following public realm projects are envisaged - these are expanded in greater detail in the projects table on page 98. The references in brackets relate to the project references in the table.

1. Improve public realm on Sheep Street and High Street, and adjoining side roads and alleys (PR6)
2. Improve pedestrian and cyclist permeability through Westway (M1)
3. Improve Rugby Station pedestrian and cyclist connectivity along Railway Terrace, alongside wider improvements to wayfinding, junction and crossing improvements to enhance linkages between the town centre and station (M3)
4. Improve pedestrian and cyclist access on Lawrence Sheriff Street (M1E)
5. New green space by The Retreat (PR3)
6. High quality town centre public realm scheme on North Street and Church Street, and adjoining streets and alleyways (PR1A)
7. Evreux Way and Caldecott park gateway public improvements (PR1B)
8. New public space by North Street (PR4)
9. Opportunity for new public space on existing Asda car park (PR2)
10. New public space on existing Old Market Place car park PR5)
11. Create iconic gateway environment around Rugby School gyratory (PR7)
12. Convert Evreux Way roundabout to a signalised junction and create high-quality gateway to Rugby town centre (M2)
13. Reallocate road space on Corporation Street to create a street environment for all (M1C)
14. New streets and spaces as part of Rugby Central redevelopment (RC20/21)
15. Station gateway development (SG1)



Fig 21 Illustrative public realm masterplan

Land Use Framework

Rugby town centre Character Areas

- 3.99 Through an analysis of the geographical and commercial context, 'opportunity areas' or key character areas have been formed. These are sites which share broadly common characters and identities. Creating defined character areas allows for the ability to concentrate a specific mix of uses to come forward at a range different built forms. This will help to create a cohesive town centre, with unique areas that complement rather than compete with one another. This will further help to focus investment to the right places and influence change, across the Regeneration Strategy period.
- 3.100 Through the analysis, eight character areas have been defined:
1. Station Gateway
 2. Webb Ellis Industrial Estate
 3. Old Market
 4. Old Town
 5. High Street
 6. Rugby Central
 7. Town Hall
 8. Corporation Street West
- 3.101 A broad land use strategy across the character areas identified is shown on Figure 22. These are indicative and do not prescribe a specific location for the delivery of the Rugby Hub.

A Flexible Framework - accommodating unknowns

- 3.102 The Regeneration Strategy period extends to 2035. Across this time period, there may be significant shifts within the property market that may be unforeseen and have implications on detailed considerations for the land use mix across the town centre.
- 3.103 This has perhaps been most evident in recent years and as we look ahead to the changes that have and are taking place within our town centres and offices resulting from the COVID-19 pandemic.
- 3.104 Where we have been able to – for example in reflecting on the Rugby Hub project as an opportunity to leverage investment in this context – we have factored these emerging market influences into the land use framework for the town centre.
- 3.105 This includes reflecting the shift to more flexible working practices driving businesses to reduce their commercial floorplates, the rise of flexible workspaces, the reduction of bricks and mortar retail in High Streets and, the shift towards 'experiential' leisure to drive animation back into town centres has been captured in the Regeneration Strategy.
- 3.106 Implicitly the Regeneration Strategy needs to be flexible. It needs to be able to respond to these market changes, and it needs to respond to key catalyst projects that are not fixed at the time of writing – namely Rugby Hub and Rugby Market.











-  **Station Gateway** - Workspace, ancillary convenience and food and beverage, higher density residential
-  **Webb Ellis Industrial Estate** - Stacked industrial and workspace, family homes, flats
-  **Old Market** - Evening / night-time economy, culture / events, food and drink, daytime leisure, retail, medium density residential
-  **Old Town** - Office / workspace, retail, food and beverage, events
-  **High Street** - Café / informal dining, active leisure, family leisure, competitive socialising, ancillary retail, co-working space, hotel
-  **Rugby Central** - Retail, food and beverage, leisure, higher density residential
-  **Town Hall** - Interceptor car park, hotel, medium density residential
-  **Corporation Street West** - Medium density residential, family homes, ancillary food and beverage and leisure

Fig 22 Land use framework



Fig 23 Examples of contemporary town centre living



Key Future Land Uses

3.107 To be resilient and attract investment into Rugby town centre, we need to deliver a vibrant mix of land uses, both through re-use and intensification of existing buildings and through development and redevelopment of underutilised assets.

Town Centre Employment

3.108 Rugby town centre does not have a strong existing office market with Rugby's central location and motorway links meaning new office stock has mainly concentrated in peripheral or out of centre locations. This has resulted in Rugby Council being the main employer and economic anchor within the centre. Other occupiers in the town centre tend to be very localised and serve the immediate population providing services such as legal, accounting and recruitment.

3.109 This lack of strong office market has meant that the office floorspace (including workspace) in Rugby town centre is limited and of relatively aged and poor quality. This has resulted in a loss of key businesses, impacting the wider high street via a loss of daily / doorstep footfall. A major employer, Cemex, has recently decided to sell their office premises on Evreux Way and move to new premises out of Rugby, as they were unable to find a suitable new premises in Rugby town centre.

3.110 To move away from a public sector dominated economy, to drive positive footfall and spend 7-days a week, Rugby town centre

must attract more private sector investment and business activities. This would grow the number of people working in the town centre and create the 'every-day' footfall to support the more diverse retail and leisure offer we want to deliver.

3.111 As a result, we think it is important to deliver modern, fit-for-purpose offices that could support medium and larger sized occupiers now looking for smaller floorplates. There is a small co-working space in Rugby but further business workspace including incubator or accelerator space, possibly in connection to the Council, should also be introduced.

Town Centre Living

3.112 Rugby is a growing borough with a significant amount of residential development coming forward in key locations. Most significant is the urban extension at Houlton which has proposed development of up to 6,000 homes. Closer to the town centre is Rounds Gardens which has the potential to deliver circa 400 homes and Cattle Market which will deliver approximately 360 homes. However, to this point, there has been limited new build residential development in the town centre.

3.113 Residential development is an important component of any town centre regeneration programme. It represents a significant opportunity to drive greater activity within the centre and can meet specific housing needs in a positive way – including locating older person and affordable living close to amenity and service provision.

3.114 Given the wider residential market strengths across Rugby, and to provide a balanced market in the centre, residential development is considered to be an important opportunity within the town centre.

3.115 It is important that a mix of homes is delivered – including both a mix of property types and tenures. This offer should include both housing and apartments whilst also providing suitable living arrangements for the elderly. A diverse tenure of homes should also be delivered including market homes for sale, build to rent properties, and a suitable provision of affordable homes – balanced with the existing affordable homes already available in the town centre.

3.116 The Regeneration Strategy recognises in the medium to long term that the existing affordable housing areas – primarily owned by the Council – will need to be better understood to ensure they are continuing to meet housing need and are sustainable from an environmental and investment perspective.

3.117 Increasing the size and diversifying the population within Rugby town centre through housing delivery will increase footfall and the frequency of spend in shops and on food, drink and other leisure activities. Consideration will need to be given to the infrastructure needed to support an expanded town centre community – including expanded health facilities and schools to support the mix desired including family living within the urban area.

Town Centre Retail, Leisure and Hotels

3.118 Retail will always be an important part of the offer within Rugby town centre but we must recognise that the high street market has significantly changed – and plan positively in this context.

3.119 Vacancy in Rugby town centre is currently 15% (PMA, Q2 2022), higher than the national average of 14%, whilst Elliott's Field Retail Park continues to show strength with good occupation and footfall. The retail offer and experience in the town centre needs to be improved to compete with Elliott's Fields, and more linked trips between the two need to be created so the latter can be embraced as part of a wider town centre retail offer.

3.120 National chain retailers continue to look to find their place on high streets across the country – with many making investment decisions based on sub-regional connectivity. To attract these names, Rugby town centre needs to be well connected with affordable public transport links to new and growing communities across the borough and more widely.

3.121 Importantly however Rugby town centre needs to develop its own unique retail offer – building on the thriving independent business culture that already exists in the centre, in particular around Old Town. Any new retail floorspace and investment should complement and cater for this type of activity to support its continued growth.

3.122 There are a number of successful cafés and restaurants in Rugby town centre, but we believe this can and should be strengthened by encouraging more of this provision – in particular to ensure activity in the centre after 6pm. Proposals at Rugby Central will also deliver a more diverse mix in the future including more food and beverage outlets.

3.123 The town centre will look to capitalise on national market trends in competitive leisure, for example Escape Rooms, Darts, the resurgence of Bowling Alleys, and other activities. This should be implemented alongside the expansion of the existing cultural offering to include more intimate music venues, and potential to attract activities like independent film and West End screenings. This will diversify footfall and encourage a more positive night-time activity, which will drive linked trips and further support expansion of a positive food and drink culture in the town centre.

3.124 In addition, we will support the expansion of the hotel offer in the town centre. The current offer is poor, with a small number of independent hotels, Bed &Breakfasts and one budget hotel near the station. The market analysis undertaken as part of the Regeneration Strategy has identified the opportunity for additional hotel provision, across a range of standards from budget to boutique, in the town centre, particularly linked to Rugby School but also in support of the desire to expand the cultural and leisure offering in the centre.



Fig 24 Examples of high quality workspace

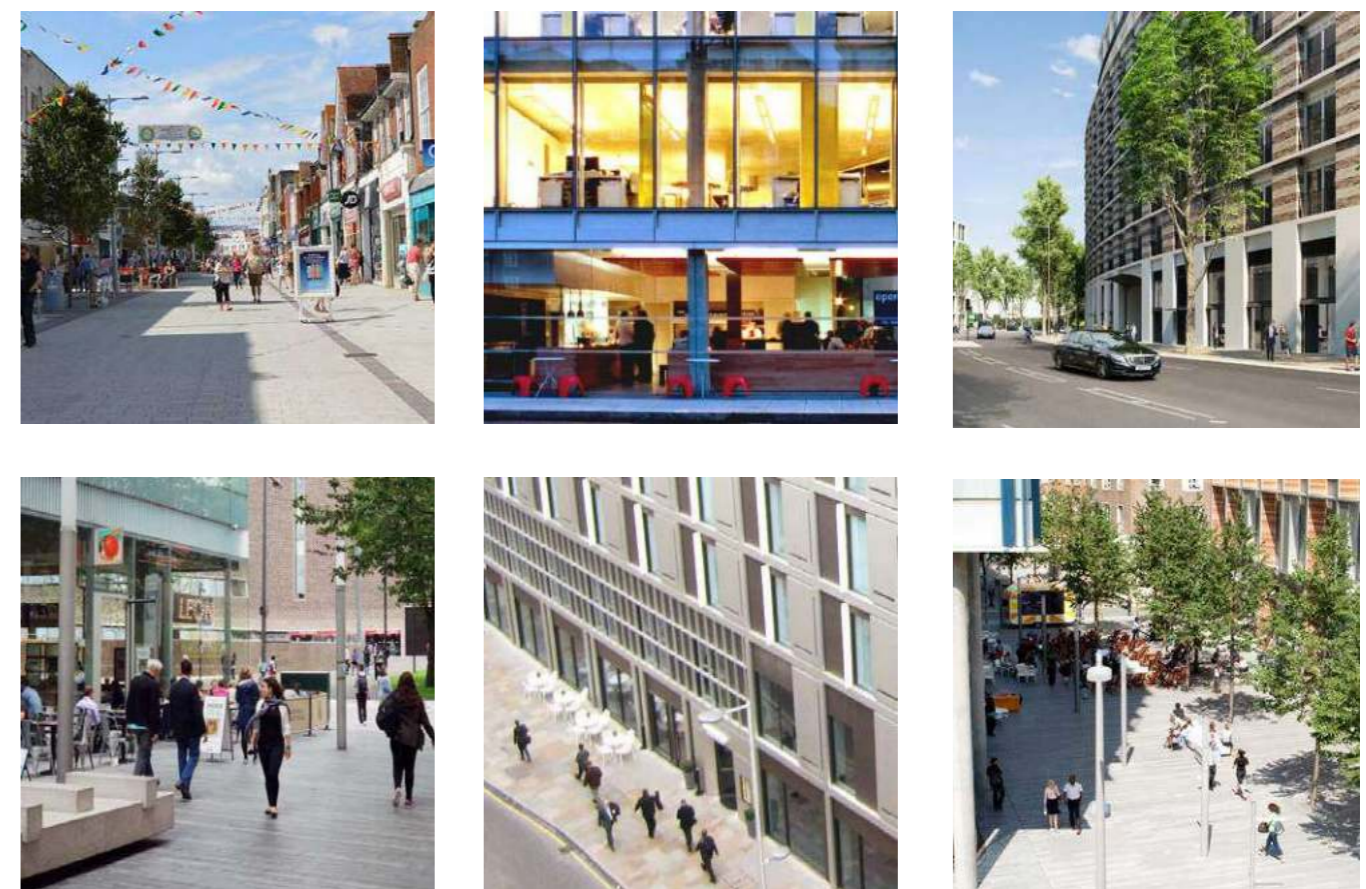


Fig 25 High quality streetscape and ground floor uses

Development Framework

Block structure

3.125 The town centre has a compact but irregular urban form reflecting its medieval heritage. The original medieval streets radiate out from Rugby's Market Place. Outside of the medieval core, the urban grain becomes much coarser with a number of larger blocks formed by retail, shopping centres and offices dominating the area between North Street and Corporation Street.

3.126 Alongside the larger urban blocks are large service areas and car parks. Immediately west of Corporation Street, the urban grain remains coarse but with slightly smaller blocks - mostly services and civic buildings - and again car parks and service areas. A more regular urban grid form is established in the residential neighbourhoods to the north and east of the town centre.

3.127 The town centre's immediate hinterland is diverse in its urban form, and often irregular in structure, possibly reflecting the different times at which they were developed or redeveloped.

Flexible development strategy

3.128 The Regeneration Strategy establishes a scale of development which is ambitious, but sensitive to existing context. The proposals adopt a flexible approach, allowing inherent flexibility for a range of land uses, an essential approach given the long-term trajectory of change envisaged. The framework identifies a range of more comprehensive proposals on major development sites, alongside opportunities for retrofit or refurbishment of

retained buildings in more sensitive locations.

Building heights

3.129 The approach to building heights varies across the town centre, responding to the particular character and context of the existing urban environment. Typical height ranges are set out on an indicative basis for each character area in Chapter 10. Typically, the Regeneration Strategy assumes a range of heights from 2 storeys to 6 storeys. Individual schemes might ultimately include taller elements, but this should be determined on a site-by-site basis. Any proposals exceeding an upper height range of 4-6 storeys is likely to require demonstration of exceptional circumstances and design quality.

Development quantum

3.130 In total, the illustrative proposals assume a total development quantum of approximately 350,000 sqm GEA across a range of uses including residential, commercial employment / office, active ground floor uses (retail, food and beverage, leisure) and hotels. The illustrative proposals assume the following approximate mix:

- 2,000 homes
- 35,000 sqm (GEA) of employment uses
- 10,000 to 15,000 sqm (GEA) of retail, leisure and food and beverage
- 40,000 sqm (GEA) of other flexible space.

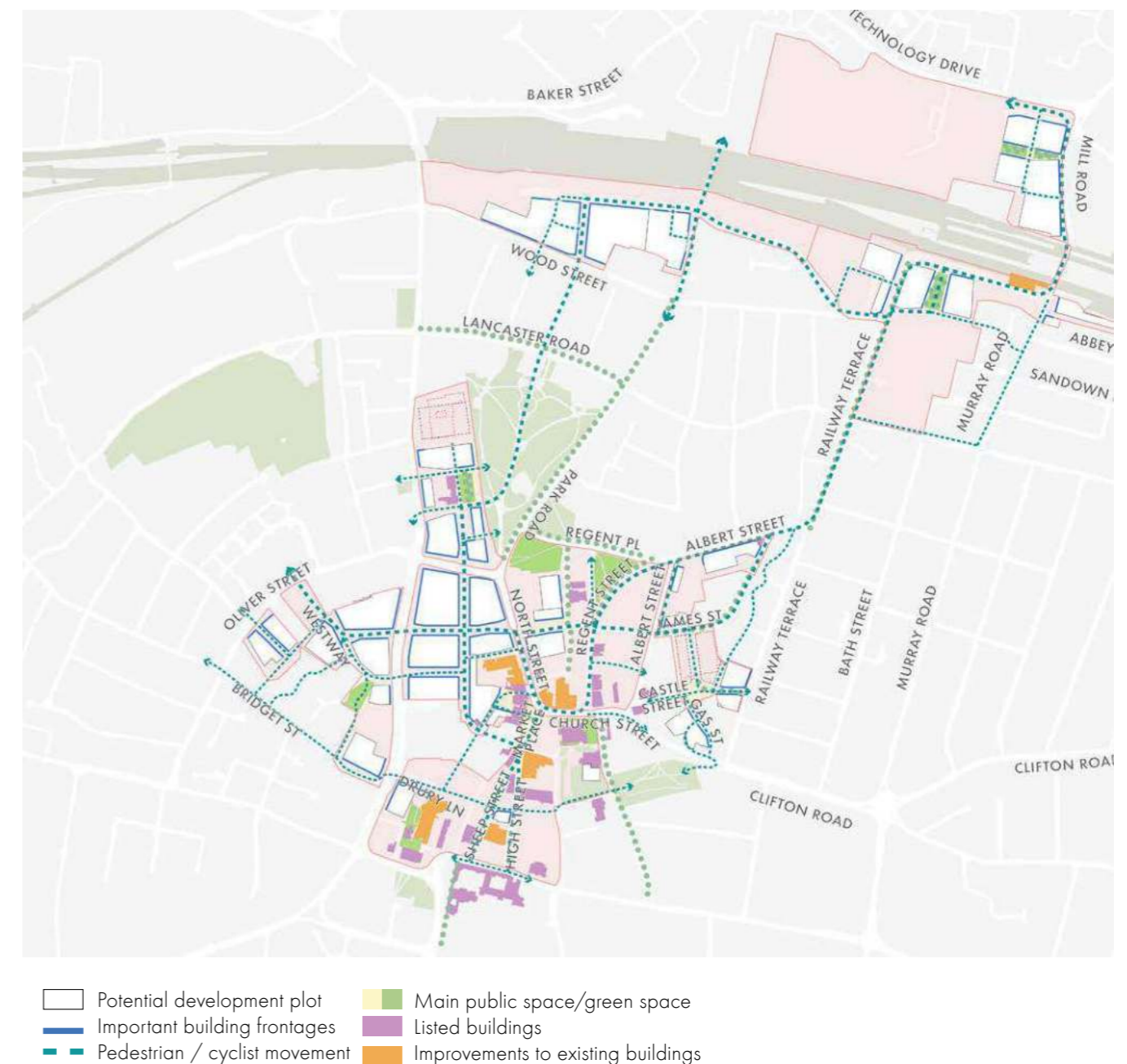


Fig 26 Development framework (see chapter 4 for character area details)

Meanwhile Uses Framework

THE IMPORTANCE OF MEANWHILE

3.131 Meanwhile activity is a relatively recent and therefore a continuously evolving concept. A ‘meanwhile’ or interim use describes a situation where a space is utilised for a duration of time, before it is turned into a more permanent end state, taking advantage of a short window of opportunity. Generally, meanwhile use is to benefit the local community and whilst it can be on a commercial basis, meanwhile generally is an investment rather than an income generating exercise.

3.132 It is important to note the role that events have played in COVID-19 recovery strategies for town centres. Following periods of separation there was a strong desire for “togetherness” which manifested in many cases as events. Event spend in the public sector increased vastly in 2021 due to the European Regional Development Fund (ERDF) Welcome Back Fund. This has reset public expectations in many areas, following periods of austerity where event funding and roles such as the town centre manager vanished. However, the ERDF funding was short-lived, and the current economic climate has created some uncertainty around public funding for events in the short term.

3.133 This Regeneration Strategy sets out an ambitious strategy for Rugby town centre, but it recognises that this process will take a number of years to be realised. Well-designed and implemented meanwhile strategies enable immediate and short-term activation of space and market testing, which can offer a stepping-stone to solving more significant issues. Successful meanwhile use can assist with:

- Addressing local issues
- Generating additional and new footfall
- Community engagement and communication
- Integrating local heritage, local pride and education
- Commercialisation of underutilised spaces
- Trial approaches / market testing

Proposed High Level Framework

3.134 The consideration of current meanwhile uses across the town centre is documented in more detail within the Meanwhile Use and Brand Analysis supporting paper to this Regeneration Strategy.

3.135 Based on an extensive review and gap analysis of events within Rugby town centre including comparison with local competitors (e.g. Leamington Spa, Coventry) and similar profile towns at a further distance (e.g. Worcester), recommendations for a future meanwhile approach are summarised in the following table on page 62.

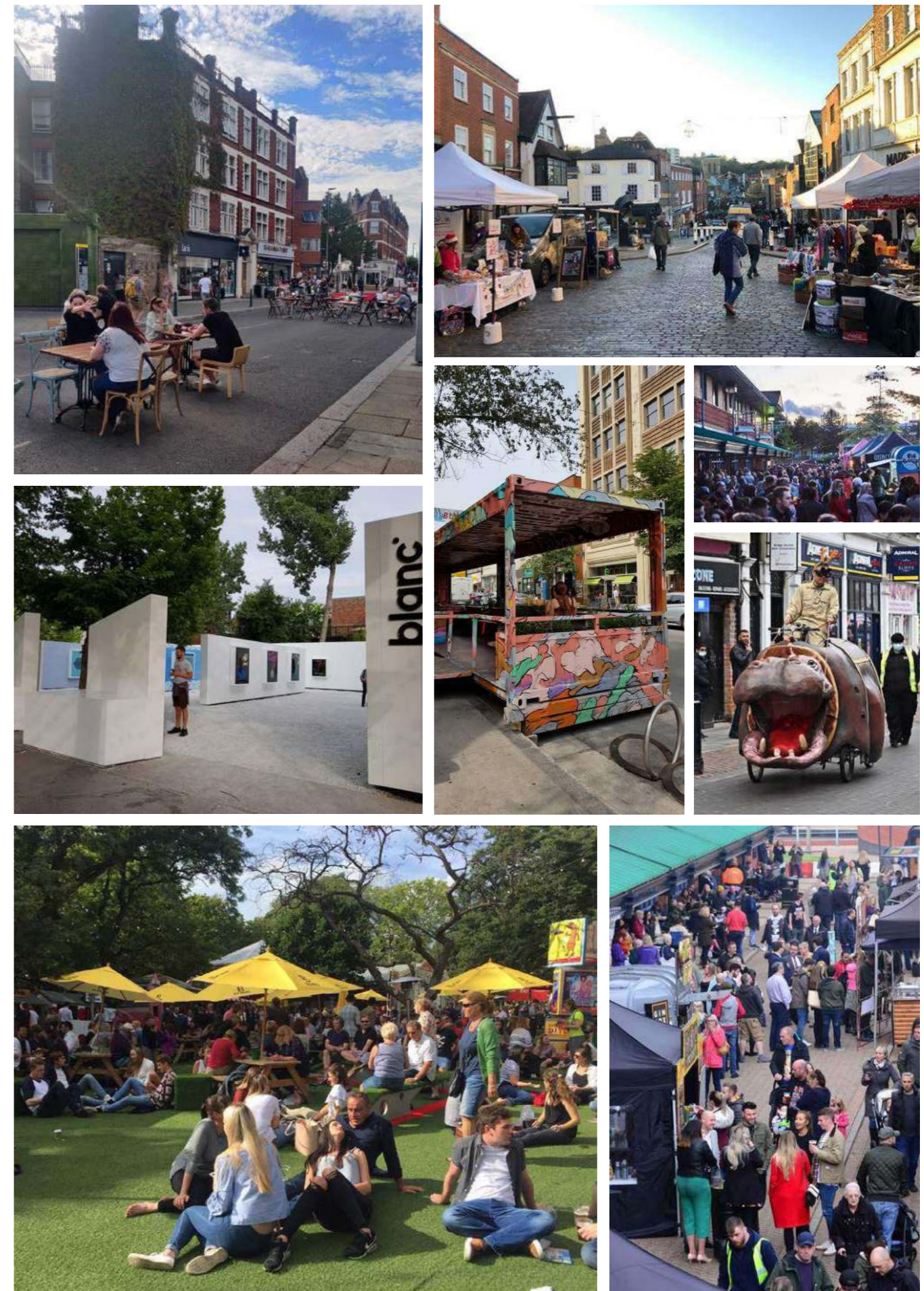


Fig 27 Examples of meanwhile uses



Opportunity	Overview	Key Locations
Markets	<p>Rugby prides and positions itself on being a “market town.” However, feedback regarding the market is generally negative. We are aware of other projects that are investigating the future of the market and do not wish to encroach upon those, but it would be remiss not to mention the feedback received.</p> <p>There is a strong desire for Rugby to retain a market, but a desire that the quality and offer is improved. When combining this with the gap analysis against competitors, it is clear there is an opportunity for the market to expand and refine.</p> <p>This could include additional “specialist” markets such as an improved farmers market or chocolate market and street food markets that span into early evening.</p> <p>In addition Rugby’s “twin” links with Russelsheim, Germany and Evreux, France should be considered to inform further themed markets.</p> <p>Avison Young have experience in supporting Walsall town centre’s market to attract visitors by enlivening the offer with street performers and random acts of kindness. This event (see case study in appendix) attracted 90% of pre pandemic footfall levels and secured significant regional media interest. We would recommend when the market is relaunched that activity such as additional enlivenment will help to reposition the markets to residents.</p>	Existing market location, Sheep Street, North Street Car Park (temporary).
Food and Drink	As above, there is potential for markets to be expanded to include Street Food Events. This will help build confidence in the town centre on its path to establishing a strong night time economy. We recommend that the council sources a partner to hold trial events in summer 2023 and progresses to monthly events if successful. Whilst the event itself will be low cost/free (depending upon commercial arrangement), we recommend investment is made into the marketing of the event to attract visitors.	Existing market location, Sheep Street, North Street Car Park (temporary).
Christmas	<p>There is potential to expand the Christmas offer as currently the town centre hosts a Lights Switch On event with accompanying fun fair, market stalls and fireworks display.</p> <p>As with the above food and drink recommendation, partnering with a market event company would add a vibrancy to the lights offer and extend the dwell time.</p> <p>Additionally, RBC could look to strengthen the Christmas Lights offer with large floor mounted light structures. There would be possibilities to have these sponsored by local businesses to limit the cost to RBC.</p> <p>As per the aforementioned market enlivenment, the event (or other festive dates) could be further extended by character appearances and/or street performers on weekends and late-night shopping days to generate additional footfall and dwell time.</p>	Existing market location, Sheep Street, North Street Car Park (temporary).
Festival	<p>Several interviewees spoke favourably about bringing back the multi-site Cultural Festival which stopped during Covid – it is unclear as to why it has not returned yet, but this would provide a tried and tested format to enhance the event calendar.</p> <p>The use of local venues to introduce a music festival would be a further addition to the calendar as there is already a strong music scene in existing venues. Creation would involve collaboration between businesses, RBC events team and BID and would require creation of branding, poster advertising and social assets to advertise the events.</p>	Town-centre wide, potential to activate vacant shop units on temporary / pop-up basis
Cultural	<p>The game of rugby is a large part of Rugby town’s history but not formally marked by an event. Running family fun days around this heritage with Rugby skills classes, demonstrations, stalls with rugby memorabilia and link in any food associated with watching the game. This could be done in collaboration with Rugby School and Webb Ellis Museum. More widely to align with ambitions to encourage healthy lifestyles, other sporting events could be facilitated through a meanwhile strategy including temporary skateboard and bike facilities, climbing walls, and trampolines.</p> <p>Tripontium (the place of the three bridges) was a Romano-British small town located just outside Rugby. Whilst other towns make much of Roman history, Rugby does not. A festival such as a “Roman Day” could be introduced and could feature a scaled model or rebuild Tripontium.</p> <p>Libraries - The town centre library is a valuable and well utilised asset. As with arts, bringing some of its facilities out into the high street will help showcase its offer and provide enlivenment but additionally thought could be given to events such as a unique award-winning project designed to give people who love music the chance to see top-notch artists in their local library. The benefit of the library location being near the present night time economy provides an opportunity to tempt new audiences into the night time economy.</p> <p>The King’s Coronation in 2023 provides additional opportunity for community cultural events. These could potentially be tied to specialist markets /street party type events. The 2022 Jubilee celebrations did not have the desired result, so would recommend a strong working party to oversee this event if it proceeds.</p>	Town-centre wide, potential to activate vacant shop units on temporary / pop-up basis, Caldecott Park
Art and Music	<p>The town has a strong arts offer with self-producing and touring theatre at both the Rugby Theatre and Benn Hall. In addition, there is the museum and art gallery and the Rugby Ball Trail. However, what is missing is the opportunity to bring art out on to the street and enliven the high street in a different way. This may be possible through:</p> <p>Art Trails -</p> <ul style="list-style-type: none"> • Introduce Rugby college students to local Graffiti/Street Artists and hold workshops in void town centre units. • Possible collaboration to brighten up the bridge across the railway connecting the town centre and the College with street art. • Add to the 2015 Rugby Ball art trail with new additions. ‘Keep the ball moving’ by adding to the five current installations already in situ. <p>Art Exhibition - Consider a pop-up exhibition in partnership with Rugby College in empty units.</p>	Town-centre wide, potential to activate vacant shop units on temporary / pop-up basis, Caldecott Park

Fig 28 Meanwhile uses framework

4 DELIVERY STRATEGY

- 4.1 This section captures the delivery strategy associated with the successful implementation of the Rugby town centre Regeneration Strategy.
- 4.2 The Regeneration Strategy is ambitious in the scale, nature and pace of change it envisages within the town centre. Over a circa 15-year delivery period it captures projects with the potential to create a revitalised town centre, including a number of projects that have been identified as catalysts for wider change.
- 4.3 Rugby Borough Council are committed to delivering against the vision and objectives established within the Rugby town centre Regeneration Strategy. Whilst the change envisaged is not underestimated, the Council acknowledge the huge opportunity to take advantage of market factors to deliver long term, sustainable and positive change within the town centre.
- 4.4 The Council further recognises that this commitment is not simply focused on the outcomes of the regeneration process – but rather ensuring that the process itself delivers benefits for the local resident and business community. It is therefore important to recognise that the delivery of the strategy for the town centre is not solely physical.
- 4.5 The Delivery Strategy identifies the need for co-ordination of input and shared responsibility across a range of stakeholders, and includes recommendations around branding and place marketing, event programming, and management alongside physical interventions.

- 4.6 One of the objectives of Rugby town centre's Regeneration Strategy is to ensure a delivery focus. This section outlines how that objective will be achieved, including:
 - Challenges to Delivery: summary of the key barriers to delivery identified through the preparation of the Regeneration Strategy;
 - Delivery Themes: review of the key themes cutting across the Regeneration as Council commitments and expectations of stakeholders through the delivery process;
 - Action Plans: summary of the projects identified within the Regeneration Strategy, covering development, public realm and movement, and non-physical project priorities;
 - Phasing Strategy: articulation of the build-up of and interface between projects identified across three time periods – short term (0-2 years), medium term (3-9 years), and long term (10 years +); and
 - Focus on Key Areas of Change: character area narrative including development strategy, design considerations, movement and public realm priorities, and phasing.

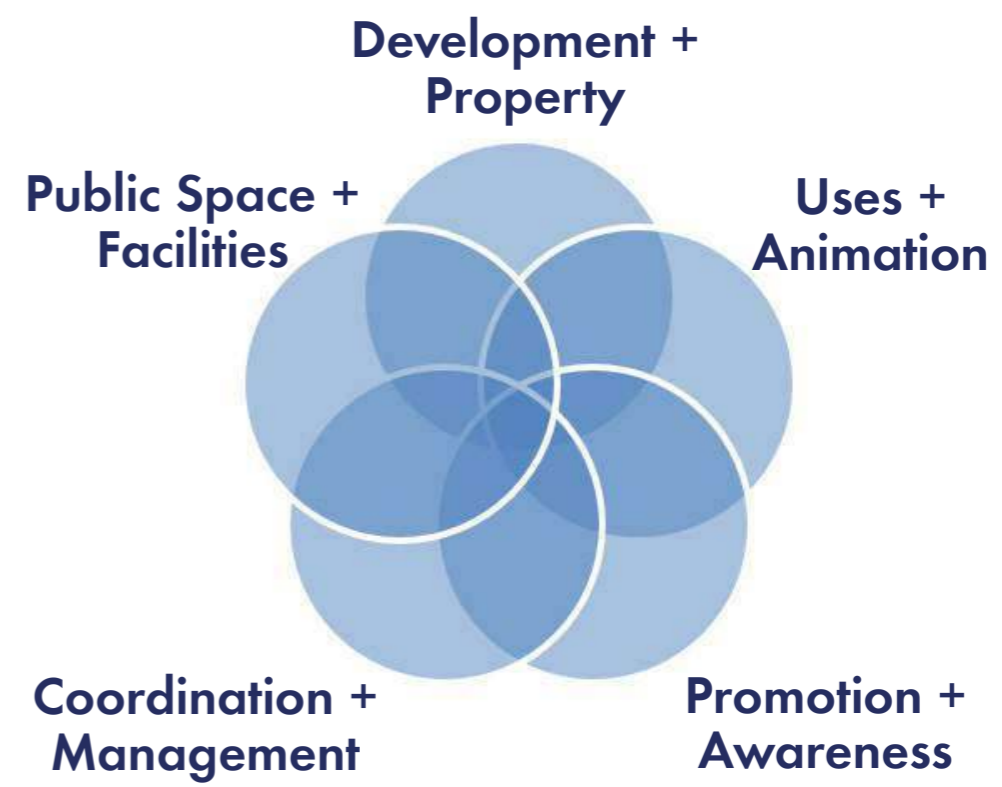


Fig 29 The phased delivery approach for the Strategy reflects five key areas of activity and intervention



Challenges to Delivery

Macro-Economic, Social and Political Influences

- 4.7 It would be remiss to not recognise the significant times in which the Rugby town centre Regeneration Strategy has been prepared.
- 4.8 The commencement of the preparation of the plan aligned closely with the COVID-19 pandemic.
- 4.9 The pandemic had a huge impact on our communities up and down the country, and within our town centres. Rugby was not immune from this, and in a period where the UK economy had still not fully understood the impacts of leaving the EU, and with wider structural changes taking place within the office and retail markets.
- 4.10 In the context of town centres, the COVID-19 pandemic accelerated changes within the office and retail markets. The pandemic emptied our offices, with many only now seeing material signs of recovery as the workforce retains a greater degree of working from home within their routine than before the COVID-19 pandemic.
- 4.11 We have also seen the closure of many shops on our high streets, and the loss of a number of well-known and established retail brands from Rugby's retail market. This includes the closing down of M&S and B&M Bargains.
- 4.12 During this period, though we did see innovation across our urban areas. This included fast-tracking road closures to create more pedestrian and outdoor seating and recreation areas, and pro-active and positive

place management measures.

- 4.13 Coming out of the COVID-19 pandemic we also note opportunities within the office market – as occupiers make decisions on their accommodation strategy and downsizing aligned with lease breaks presents opportunities to attract businesses into core urban areas.
- 4.14 Now, in a post-pandemic period, the UK and global economies face a relatively bleak outlook. Energy price increases, prospects of recession, high inflation rates and increasing interest rates, and a cost-of-living crisis, coupled with a period of political uncertainty within the UK with the prospect of return to austerity-like conditions, present a challenging context for investment and delivery.
- 4.15 It is impossible to accurately predict the full extent of the impact and influence that these external factors will have on Rugby town centre and the delivery of this Regeneration Strategy.
- 4.16 The Strategy has been prepared in this context – recognising that there is a need for flexibility to ensure it has longevity. This comes in the form, for example, of a range of recommended land uses on key sites set in the context of design and development parameters.
- 4.17 There is also a recognised need to ensure the Regeneration Strategy is kept under regular review. Any such review should take account of the changing context for investment within the town centre – economic, social, political, and environmental.

Development Viability and Funding Challenges

- 4.18 Viability challenges exist across the development proposed in Rugby town centre. This includes market challenges generally within both retail and offices, the emerging nature of residential development within the core of the town centre, and the emphasis within the Regeneration Strategy on quality of development from the first phases of delivery including significant contribution to an enhanced public realm.
- 4.19 It is a fundamental principle of the Regeneration Strategy that early phase and catalyst delivery will have positive impact on market conditions and therefore improve viability over time.
- 4.20 This highlights the importance of delivering the identified short term and catalyst projects to a high-quality standard to set longer term benchmarks for development and to 'lift' the local market – recognising the need for innovation and efficient and effective use of public sector investment to leverage private sector investment.
- 4.21 With political uncertainty and change in the UK comes funding uncertainty. Whilst in recent years we have seen significant public investment in town centres come through programmes such as the Future High Street Fund and Town Deals, these appear to have been replaced by a Levelling Up programme, suggested to be sized at £4.8bn. With decisions imminent on Round 2 bids, it is hoped that Round 3 locations (including Rugby) are invited to make submissions to the programme.

4.22 Rugby Council has recently submitted a successful application to the UK Shared Prosperity Fund (UKSPF).

4.23 It is critical that this, and any other funding secured from the public sector is channelled into projects that create the right conditions for private sector investment. This includes the need to create a quality physical environment and critical mass to leverage investment.

Council Ownership and Impact on Car Parking

- 4.24 The Regeneration Strategy includes a number of development and project proposals on land which is currently owned by the Council – and recognises that a significant proportion of this land are car parking assets. These assets will generate an income for the Council currently, and historically have been important to support Council employees and visitors making trips to the town centre.
- 4.25 The Regeneration Strategy has concluded that there is too much car parking within the town centre – and critically that a significant extent of that oversupply is across relatively inefficient and often poor-quality surface level car parks.
- 4.26 The strategy recommends the release of these assets to enable positive development and investment to take place. However, it does not recommend the complete removal of car parking from the town centre, and certainly not from Day 1 of the implementation period.
- 4.27 In the context of the climate emergency declared by the Council in 2019 and the need to create clean air zones within urban centres, it is important to be proactive about changing behaviours in relation to private car trips into

the town centre. However, whilst there is an aspiration to reduce the number of cars within the town centre – a shift to electric cars will mitigate some environmental concerns, and we should still therefore plan positively for some parking to be retained.

4.28 In considering its car parking assets, the Council will need to think pragmatically about the loss of income generation, balancing it with potential future additional income streams including, for example, improvement of retained assets, Electric Vehicle charging infrastructure, the commercial structure of the Rugby Hub project, and any receipts it may receive for land assets release for development purposes.

4.29 Decisions will need to be made in this context which balance financial impact with changing behaviours, reducing car dependency, and creating the right environment and opportunities for development across the town centre. This must be implemented alongside ensuring quality, accessible and affordable public transport provision.

Third Party Land and Existing Business Impact

- 4.30 The Regeneration Strategy includes the potential for delivery on land and assets not owned by the Council. In instances this will include the displacement of existing businesses.
- 4.31 It is important that the implementation of the Regeneration Strategy does not simply displace these affected businesses out of the area where there is potential and value in retaining them, either within the centre where appropriate or as a worst case within the borough more widely.
- 4.32 Businesses will need to be supported through this process to ensure their needs are met through any relocation – this may include financial support as appropriate but will also include support to find the right locations to enable the business to operate efficiently and in a way to maximise its potential in the future.
- 4.33 In some cases this movement of businesses may happen naturally, and some will want to cease operation, but where this is not the case there is a recognised key role for the public sector to provide that support as necessary to facilitate positive change in the future

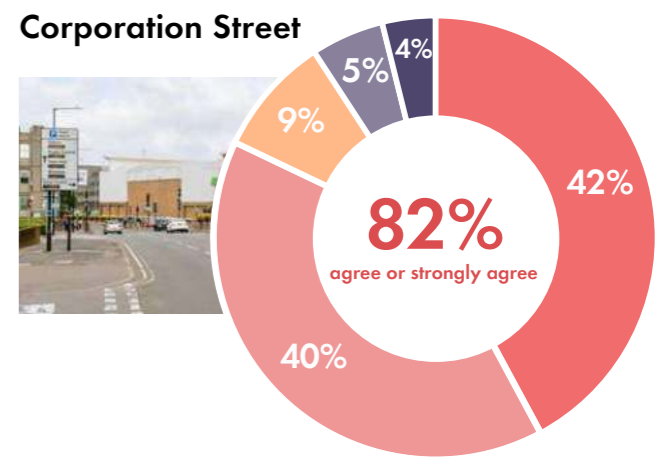
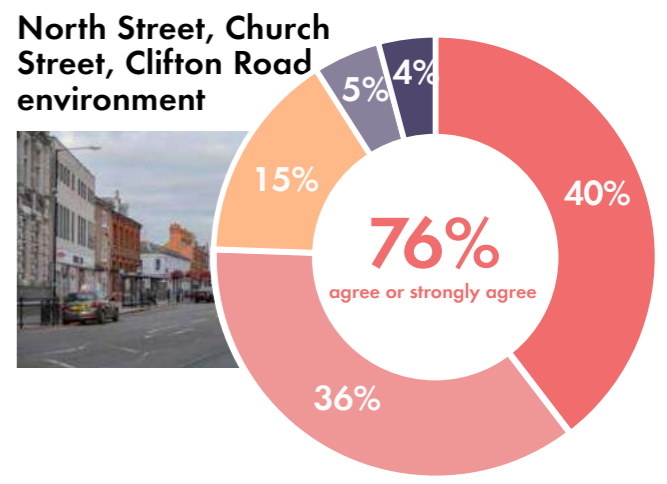
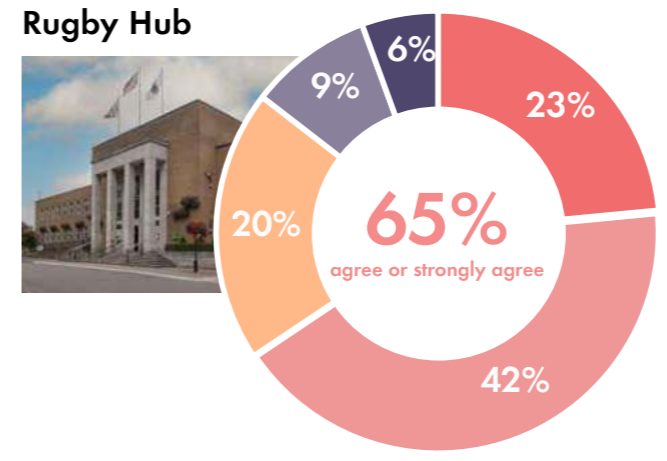
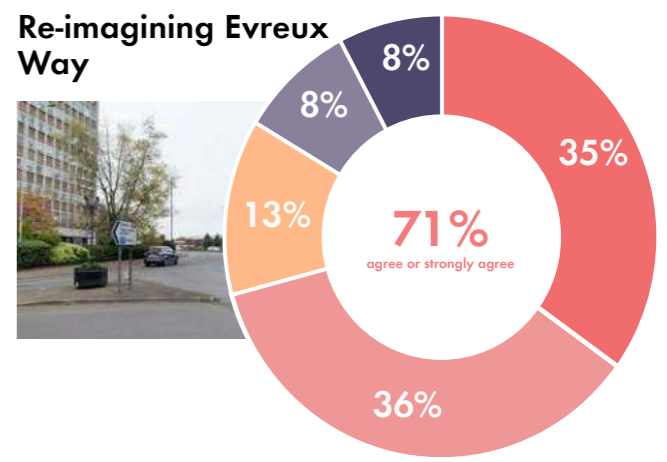
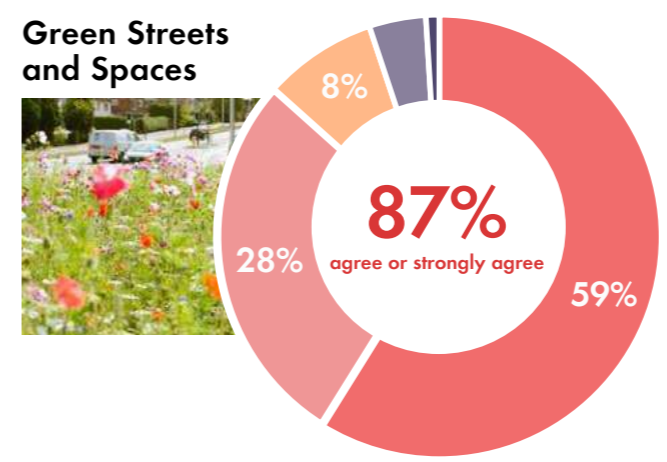
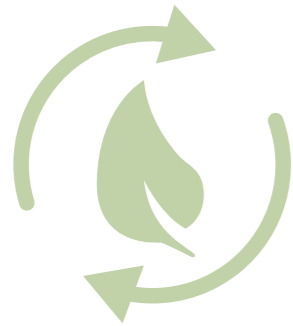


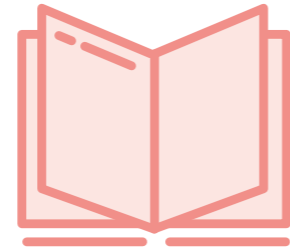
Fig 30 Our stage 3 engagement demonstrated a very strong degree of support for a number of our key delivery proposals

Delivery themes



Delivering Sustainable Change and Addressing the Climate Emergency

- 4.34 Rugby Council declared a climate emergency in July 2019, and has made a commitment to reduce the Council's CO2 emissions to net zero by 2030. The Council has also committed to provide community leadership to help reduce CO2 emissions towards net zero across the borough, establish action to tackle climate change as a key driver of all decision-making; and take action to mitigate the impact of climate change on a Borough wide basis and beyond, through adaptation.
- 4.35 The Council's Corporate Strategy (2021-24) sets out clear commitments in this space, and local political governance is in place including a Climate Emergency Working Group consisting of seven Councillors.
- 4.36 Future delivery in the town centre in line with this Regeneration Strategy will be progressed in accordance with this context and these commitments. The Council expects all partners in delivering against the Regeneration Strategy Vision and Objectives, and the strategies set out, mirror and integrate the commitments made.
- 4.37 This will be further enabled through the adoption of the Climate Change and Sustainable Design and Construction Supplementary Planning Document (programme for adoption noted below) – which will require specific consideration in future development proposals.



Establishing a Planning Framework

- 4.38 The Rugby Borough Local Plan and Policies Map (2011 – 2031) was adopted in July 2019. Given the Local Plan is relatively recent in terms of its adoption and therefore examination by an Inspector, there is no stated programme for a review of the document.
- 4.39 The Council has the committed intention to prepare a supplementary Planning Document relating to Gypsy and Traveller Site Allocations, to be adopted in Autumn 2024 against current programme. It also intends to adopt two Supplementary Planning Documents relating to Planning Obligations (programmed in the LDS for a January 2023 Adoption), and Climate Change and Sustainable Design and Construction (programmed in the LDS for a December 2022 Adoption).
- 4.40 It is expected that if and when any review of the Local Plan takes place, and/or the preparation of a new Local Plan commences, that the Rugby town centre Regeneration Strategy is integrated into policy relating to the town centre (i.e. update to Policy TC1, TC2, TC3 of the current Local Plan). The alignment of an update to the Regeneration Strategy to ensure it is an up-to-date evidence base for the purposes of the Local Plan should be considered.
- 4.41 Given the time likely lapse between the completion of the Regeneration Strategy and any review of the existing planning policy for the town centre, it is considered prudent that weight is given to the document to be a material consideration within future planning

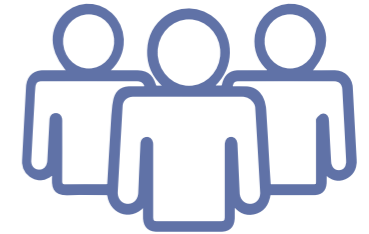


applications – as a minimum. This should include agreement of the document by Rugby Council Cabinet.

- 4.42 In addition, the Council should consider the potential to progress the Regeneration Strategy as an additional Supplementary Planning Document. It is advised that this route is considered once there is greater certainty around the nature and defined location for the Rugby Hub project, and on completion of the Car Parking and Development Enabling Strategy (project NP3).
- 4.43 On Council owned sites, and where adjacent third party interests are identified as being delivery critical, individual Outline Planning Applications may be prepared to ensure additional steps are taken to strengthen the planning framework. This may be necessary as part of any future land assembly and Compulsory Purchase Order (CPO) implementation, and/or to maximise the value of Council assets pre-disposal.

Governance and Resource

- 4.44 The Council recognise that the Regeneration Strategy represents a coherent programme for intervention and change across the town centre. This needs to be resourced appropriately – ensuring capacity and capability is in place, within the right structure, to enable the Strategy to be delivered.
- 4.45 The Council's role across this programme is varied – including as 'lead' (e.g. as decision maker, asset owner / occupier), as having a 'supporting' function (e.g. associated with



business relocations and funding applications), or as Statutory Authority (e.g. through pre-application processes and planning application determinations).

- 4.46 The Council will reflect on the implications of this Regeneration Strategy and ensure that appropriate governance and resource is in place to deliver identified priorities.

Third Party Land Interests

- 4.47 The Regeneration Strategy has identified four key areas where third party land issues are known to be key considerations: Corporation Street West character area; properties between the Council owned North Street Car Park and North Street; the Stagecoach Depot; and Rugby Central Car Park.
- 4.48 As a principle, Rugby Council wants to work positively with occupiers and owners of assets across these areas. This will include exploring appetite for delivery in line with the Regeneration Strategy and where appropriate and possible, support to enable business relocations to facilitate redevelopment.
- 4.49 Subject to securing capital through its own budget or via funding applications, the Council will positively progress strategic land assembly required to deliver the Regeneration Strategy – focusing on acquisitions that leverage marriage value and optimum outcomes associated with existing Council ownerships. Where necessary the Council will use its Statutory Powers including Compulsory Purchase Orders to secure interests required to deliver in line with this Regeneration Strategy.



The Importance of Partnership Delivery

- 4.50 One of the genuine measures of success for the Rugby town centre Regeneration Strategy will be the extent to which it leverages private sector investment into the area.
- 4.51 Rugby as a borough has a significant track record and prominence as a location to invest – with significant growth envisaged in key locations comprising numerous urban extensions, and development taking place at the station. But too little of this investment takes place within the core of the town centre.
- 4.52 The recent sale of the Rugby Central shopping centre to an owner looking to progress with a reimagined and partially redeveloped centre, and the acquisition of the former Cemex building in the town centre for redevelopment purposes, are indicators that interest is there to be built upon.
- 4.53 As one of, if not the, largest asset owner within the town centre, the Council will want to play an active role in the delivery of the Regeneration Strategy. However, it recognises the importance of working in partnership to deliver the full ambition and scale and nature of change established within this document.
- 4.54 This means working with existing private sector asset owners – including at Rugby Central and the former Cemex offices – to push for the best outcomes for the town centre and its community. It also means attracting new investors and developers into the town centre – focusing on those that share the same values and commitment to deliver in line with this Regeneration Strategy.

- 4.55 In order to attract the right calibre of partner to the town centre, there is recognition of the need to ensure a critical mass of development and investment is possible. Whilst a full options assessment will need to be undertaken in advance of any decisions on Council-owned town centre assets – it would be prudent to assume that progression of delivery across released assets would be best considered as a package of sites rather than standalone disposals.
- 4.56 Subject to further testing and Council appetite and capacity (including budget), a Joint Venture structure could be considered across this package, which could also include delivery of the Rugby Hub. Alternatively released assets could be disposed with the benefit of planning as a package, under a Developer Agreement to secure desired outcomes.
- 4.57 More widely, the Regeneration Strategy has been developed in partnership with a number of public sector stakeholders who will be critical to its delivery. This includes an important ongoing relationship with Warwickshire County Council as Highways Authority, Homes England as the Government's housing delivery agency, United Utilities, National Grid, Network Rail, and the NHS and 'blue light' services.



Putting Our Community First

- 4.58 The Regeneration Strategy has been developed through an extensive process of community and stakeholder engagement. It has been clear throughout that there is a genuine sense of local passion and enthusiasm for the town centre, and a desire to see investment and positive change.
- 4.59 The strategic moves and key principles in the Regeneration Strategy have received a high degree of support through the engagement which is a good basis for progressing the key interventions defined in the Regeneration Strategy.
- 4.60 The Council will continue to engage the community and key stakeholders on key projects and future implementation strategies for the town centre. In some cases, it is envisaged that the engagement process will identify champions and supporters who will remain actively involved in projects as they move forwards.

Achieving Quality in Design

- 4.61 It is vital that proposals for new development, public realm enhancements and movement interventions are of the highest design quality.
- 4.62 The Regeneration Strategy sets a high bar for emerging proposals with a clear steer in relation to placemaking, design and delivery principles.
- 4.63 As set out in the planmaking section, it is envisaged that the Council will draw upon the



- Regeneration Strategy in defining appropriate planning policies relating to the town centre. Design quality will be a key focus in this regard. As noted above, there is also potential for the Council to prepare supplementary design guidance (SPD) for the town centre. This could be in the form of site-specific development briefs, or overarching design guidance for the whole town centre.
- 4.64 In this context, it might be appropriate for the Council to prepare a town centre specific design code (or design guidance) which sets out the key design priorities for streets, spaces and buildings with appropriate reference to historic character and opportunities for contemporary design solutions.
- 4.65 Alongside design guidance and policy, it is recommended that the Council identify design champions or design guardians to highlight the importance of good design in relation to major planning decisions and strategy development.
- 4.66 In addition, applicants should be required to engage proactively in a Design Review process, particularly for major schemes. This might involve early design review as part of the pre-application process, and further review prior to the submission of application material.

Long Term Stewardship and Commercialisation of Public Realm

- 4.67 Delivering high standards of maintenance and care within the public realm will ensure the environment remains safe and attractive to users. It also ensures the obligations under any future development agreements or leases are being adhered to and in the early part of the public realm life cycle the necessary maintenance is being undertaken ensures warranties are kept in place.
- 4.68 Below is an indicative example of the types and frequency of tasks that should be undertaken within the public realm.
- 4.69 It is important especially during any warranty period that these maintenance recommendations are upheld as deviating from them may invalidate any claim for remedy in event of a defect. It is also noted that the maintenance regime may alter in time e.g., the trees will initially need to be watered twice

weekly for their first two months and weekly for the following ten months.

- 4.70 Whomever resumes the responsibility for managing the estate should develop a site specific plan that retains all rights under the warranties.
- 4.71 Over the course of the life of the public realm there will be a need for periodic replacement of all of the items delivered. This replacement will be influenced both by the materials selected on installation but also the levels of usage they receive. A robust approach to maintenance and early stage rectification of any faults can increase the life span of every element.
- 4.72 A high level life cycle cost illustration is included below – summarising when lifecycle costs could be expected across the town centre – subject to the detail of design and delivery of the public realm across the area.
- 4.73 Any future public realm strategy (outside of private interests) must have regard to value

Daily	Site inspection* *only feasible if on site presence but helps maintain exceptional standards Security patrols and CCTV monitoring Immediate attention to items affecting health and safety
Weekly	Cleaning and litter removal Landscaping and watering
Monthly	Redecoration of street furniture Statutory inspections and audits Tree survey Bulb planting
Ad Hoc as required	Repairs Graffiti removal Gritting Lighting bulb replacement

Fig 31 Overview of typical public realm maintenance regime

generation and direct commercialisation and/or service charge structures to be in place to enable funds to be in place. This will create reserve funding to mitigate large scale cost items.

- 4.74 Once developed, it is feasible to consider events and schemes that may in fact generate revenue within the realm. This revenue can be retained to help reduce the ongoing running costs or as commercial return subject to whether service charge can be leveraged to address ongoing costs and maintenance.

4.75 Some examples of commercialisation opportunities include:

- Sponsorship of elements of the estate, for example local businesses may wish to sponsor a bench or an area of planting;
- Specialist markets;
- Hiring out available space; and
- Making the space available for filming - production companies frequently look for underutilised locations.

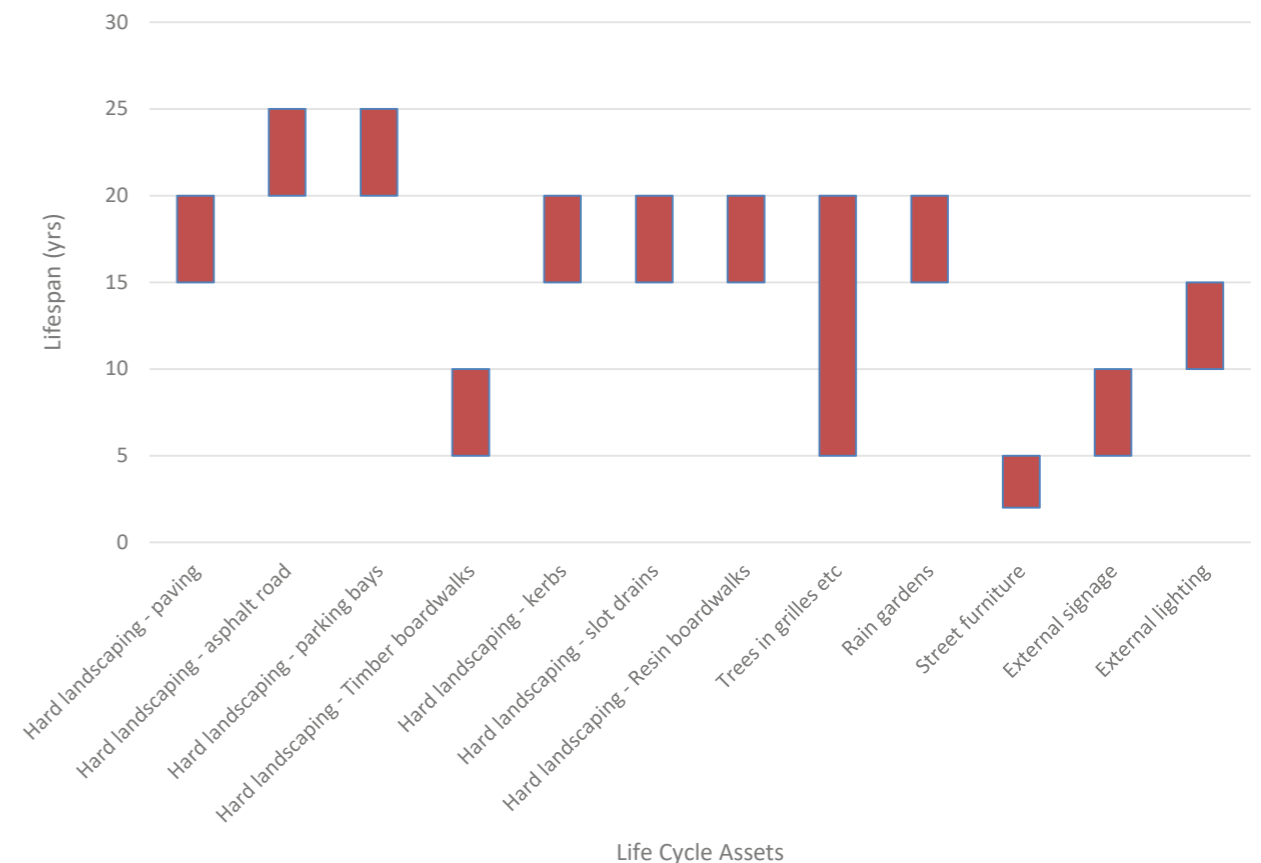


Fig 32 Graph illustrating typical life span and life cycle of public realm assets



The Role for Meanwhile

- 4.76 The Regeneration Strategy is supported by a stand alone review of existing meanwhile / temporary activities and events programme for the town centre – set in the context of national best practice, and sub-regional competitors. It makes specific recommendations around a meanwhile strategy across the centre and for key sites which has been integrated into the Regeneration Strategy.
- 4.77 The design and delivery of a robust meanwhile strategy will be an important part of attracting positive footfall into the town centre, is a means to test and develop new markets / concepts and can activate different areas of the town. It should be delivered in partnership with the private sector – including perhaps most critically the owners of the Rugby Central Shopping Centre.
- 4.78 The design of future public realm across the town centre must include considerations of how it can facilitate events and meanwhile uses in the future. This includes ensuring a robust materials palette, and that elements including water sources and power connections are designed in sufficiently to create options in the future.

Brand Development and Place Marketing

- 4.79 The Regeneration Strategy has considered the existing Rugby town centre brand and identified areas where this can be improved in the future.
- 4.80 There is a need to have a town centre identity that can be used to communicate the town centre's key messages to different groups including: residents, visitors, investors and the media.
- 4.81 Whilst the Regeneration Strategy has clear aspirations, it is important that branding is reflective of both the history and future of the town and resonates with different groups for different purposes.
- 4.82 The analysis supports the view that people feel Rugby town centre has a story to tell that isn't yet getting out. The positives of the town centre are a too-well-kept secret. People know there is a strong history, but there are question marks over how that is best utilised and leveraged in the future.
- 4.83 Taking on board the themes identified in the analysis it is evident that heritage is a huge factor in the mind of town centre stakeholders. However, the regeneration programme is rooted strongly in the future of the town centre. There is therefore a careful balance to strike between celebrating the past and looking forward to a successful future.
- 4.84 The people of Rugby were repeatedly mentioned as a special part of what makes the place unique. When you start to combine the

history of Rugby with its people an insightful story emerges.

- 4.85 A story of a town that changed the rules...
- “A fine disregard for the rules of football,” said of William Webb Ellis, inventor of the game of Rugby
 - “Why not substitute a turbine for a piston engine.” Sir Frank Whittle, inventor of the Jet Engine
 - “Curiouser and curiouser.” Lewis Carroll, author, educated at Rugby school
 - “I refuse to fight.” Charles Frederick Carter (educated at Rugby School and founding vice chancellor of Lancaster University, sentenced to imprisonment for refusing to fight in World War II)
 - “It's a magazine.” Edward Cave, publisher and inventor of magazines, expelled from Rugby School for... breaking the rules.
- 4.86 Combine the above with Rugby school being initiators of the house system used worldwide in schools today, Rugby's key location on the rail network, the famous brand names that have emerged from Rugby over the years – British Thomson-Houston, Rugby Cement/Cemex, Gilberts and it's easy to see that Rugby has had an impact on the world far beyond sport.
- 4.87 We believe Rugby has a fighting spirit. The people of Rugby are innovators, inventors and trailblazers. They are quite literally the game changers.

4.88 This will be the guiding brand proposition for the town centre in the future:

- 4.89 Rugby town centre – **The Game Changer.**
- 4.90 The Council will work with local creative practices to develop a clear brand framework for the town centre taking its lead from this proposition.
- 4.91 Establishing a brand for the regeneration programme and then using that brand consistently across the town centre will help in ensuring clear messaging and provide an identity, this is incredibly important for making the public realm a destination.
- 4.92 A communication strategy should be developed and throughout the build process and a brand agreed upon that can flow through the development and post development. Involving local schools and community groups is encouraged, it contributes to social value and supports the Council's objectives in delivering inclusivity. Encouraging interest in the scheme from a wider variety of sectors and age groups will contribute to its longevity.
- 4.93 The brand should also be used for all signage and wayfinding across the town centre, this contributes to the sense of place.
- 4.94 The set up and control of social media outlets will also be captured as part of the branding and communication strategy. This is the quickest route of engagement with the community and can help deliver positive messages and provide much needed updates as the estate develops.



Regeneration Framework Action Plans

Flexibility

- 4.95 As noted previously, the Regeneration Strategy is not a fixed strategy for Rugby town centre.
- 4.96 It sets out an agreed Vision and Objectives and identifies a number of projects identified as being significant opportunities to deliver against those agreed ambitions across eight character areas.
- 4.97 At the time of writing there are material unknowns within the Regeneration Strategy – including within projects identified as key catalysts for wider change. This includes, for example, the need to crystallise the nature and location of delivery associated with the Rugby Hub (insert project reference) and the need for more clarity around car parking release.
- 4.98 Once greater clarity is established associated with these fundamental pieces of the town centre, it may be necessary to update the Regeneration Strategy to include greater certainty on programme and strategy for delivery and greater optioneering around Rugby Hub delivery and alignment with wider development opportunity across car parking assets to be released.
- 4.99 As previously noted, alternatively it may be necessary to update the Regeneration Strategy as part of any future Local Plan review process.

4.100 The following three tables summarise the projects identified across the town centre including: development projects, movement and public realm projects, and non-physical priorities. A total of 57 projects have been identified in total including 27 development projects, 24 movement and public realm projects and 6 non-physical priorities.

4.101 The action plans identify:

- Project references
- Project names
- Description of project
- Location of project (by character area)
- Known land ownership
- Lead delivery responsibility
- Timescales (short i.e. 0-2 years, medium 3-9 years, long 10 years+)
- Funding (low i.e. under £250,000, medium i.e. between circa £250,000 and £1mn, and high i.e. likely over £1mn +)
- Interdependencies between projects
- Desired outcomes from project delivery
- Key next steps

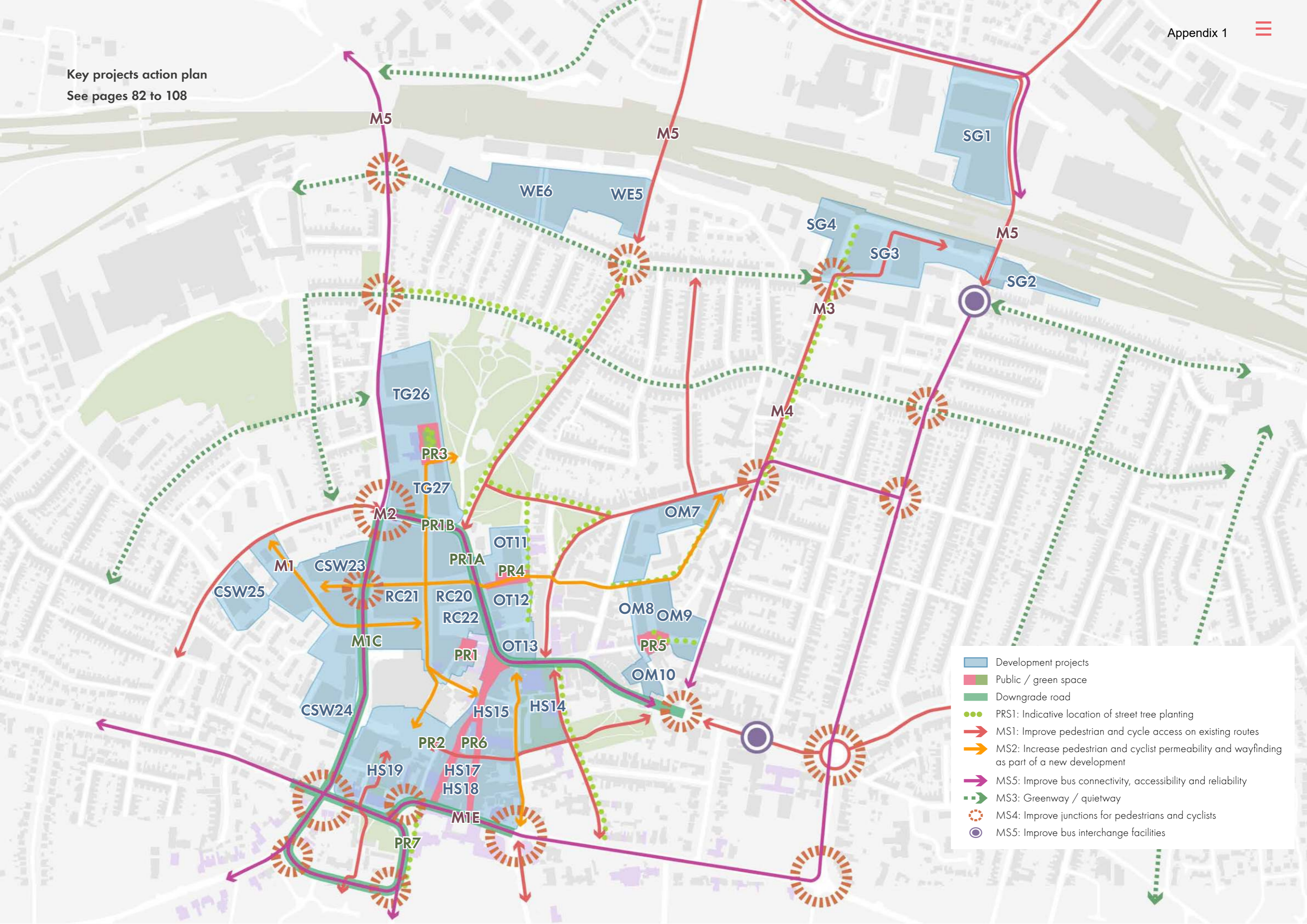
4.102 The action plans have been ordered in terms of phase of delivery – aligned with the subsequent phasing narrative. Shading has been used to indicate the assumed role of the Council in relation to the project identified: i.e. distinguishing between lead, supporter / facilitator, or statutory in nature.

4.103 The non-physical action plan describes the status of each project, categorising projects against three options:

- Explore = Potential to pursue. Further thought to be given to funding arrangements and mobilisation of the intervention.
- Action = Likely to come forward, and currently within Council's existing pipeline of work.
- Continue = Live and aligned with current Council Activity.



Key projects action plan
See pages 82 to 108



- Development projects
- Public / green space
- Downgrade road
- PRS1: Indicative location of street tree planting
- MS1: Improve pedestrian and cycle access on existing routes
- MS2: Increase pedestrian and cyclist permeability and wayfinding as part of a new development
- MS5: Improve bus connectivity, accessibility and reliability
- MS3: Greenway / quietway
- MS4: Improve junctions for pedestrians and cyclists
- MS5: Improve bus interchange facilities



Rugby town centre Framework Delivery Approach

DEVELOPMENT SITES

	Council-led
	Council Supported
	Council as Statutory Authority

Ref	Name	Description of potential development options	Character Areas	Status	Ownership	Delivery Responsibility	Timescales	Cost	Interdependencies	Outcome(s) / Theme Alignment	Next Steps
SG4	Myson House and Car Park	Redevelopment of Myson House and surface car parking, to deliver new homes and workspace.	Station Gateway	Stepnell Development Ltd have recently purchased the site. A planning application has been submitted for Myson House and car park. The outline application seeks for the "demolition of six storey office block and construction of 2no. six storey apartment blocks with associated external works and landscaping."	Stepnell Development Ltd	Private sector delivery by developer. Council should proactively engage to understand the quality and type of housing coming forward.	Short term	Medium	N/A	<ul style="list-style-type: none"> Enables a diverse mix of homes to come forward in line with investment already present (Market Quarter) 	Council to engage with developer to understand scheme coming forward.
HS16	Old Town Hall	The old town hall building is proposed to be retrofitted to deliver new flexible commercial uses.	High Street	At present, no engagement or planning application has been submitted.	AJ Bell Trustees	Council to consider opportunities to partner with landowners and support delivery through unlocking funding.	Short term	Medium	N/A	<ul style="list-style-type: none"> Delivery of new leisure / retail / workspace floorspace increases the mix of uses securing greater resilience in the town centre. Enables a greater opportunity to improve the public realm and create new routes for pedestrians and cyclists. 	The Council needs to engage with landowners and businesses.
HS18	Woolworths	Refurbish the building to deliver flexible commercial uses to reanimate the high street.	High Street	Planning application has been submitted for the redevelopment of the Woolworths Building. Proposal comprise: "The renovation and conversion of the existing buildings at 30 and 32 High Street, and 15 Sheep Street (excluding most of the ground floor at 30-32) to provide residential accommodation consisting of 32 units, including rooftop penthouse extensions and alterations to the existing building facades." No decision has been made.	PDR Investment	Private sector delivery by developer. Council should proactively engage to steer new development as it progresses through planning.	Short term	Low	N/A	<ul style="list-style-type: none"> Delivery of new leisure / retail / workspace floorspace increases the mix of uses securing greater resilience in the town centre. 	The Council needs to engage with the developer to steer the proposal and the uses coming forward.
TH27	Town Hall	To deliver a mixed-use scheme that could comprise hotel, new residential, open space, and ancillary retail / leisure.	Town Hall	The Council's operation remain in the Town Hall and the Benn Hall is operational. A study is underway to determine where the Rugby hub could be relocated.	Hope 4 (Rugby) Ltd, RBC	Council responsibility to determine most appropriate approach. Could look to undertake direct delivery or procure a private sector development partner via a Joint Venture.	Short / Medium term	High	NP3: Car Parking Strategy Rugby Hub Study (on-going)	<ul style="list-style-type: none"> Introduction of a new housing offer type which delivers an increasingly balanced housing offer. Delivery of new leisure / retail / workspace floorspace increases the mix of uses securing greater resilience in the town centre. Will create new routes and permeability, improving the opportunities to prioritise sustainable modes of transport. 	<p>Dependent on the outcome of the Rugby Hub study. Will require the Council to commission a car parking study that encapsulate both public and private car parks across the town centre.</p> <p>RBC have control over the delivery of this site. Should consider commissioning a more detailed design study to determines the best scheme for the site.</p>



Ref	Name	Description of potential development options	Character Areas	Status	Ownership	Delivery Responsibility	Timescales	Cost	Interdependencies	Outcome(s) / Theme Alignment	Next Steps
SG3	Bus Depot	Redevelopment of bus depot to deliver residential-led scheme with ancillary commercial ground floors. Density of development in this location, alongside other parcels in Character Area SG could support improvement of Mill Road underpass, and wider connectivity around the station.	Station Gateway	No current plans for redevelopment. Previous engagement has been undertaken with Stagecoach and an alternative site was sought at the time. No site was found, but this process needs to be revisited to explore current and future options to facilitate this move given the importance of the site.	Midland Red South Ltd	Council to consider station gateway masterplan and procure private sector development partner / consider Joint Venture.	Medium term	High	N/A	<ul style="list-style-type: none"> Enables a diverse mix of homes to come forward in line with investment already present (Market Quarter). Create opportunity to deliver new open spaces as part of the residential redevelopment. Creates an opportunity to improve the public realm and create new routes through the development. 	<p>Council to engage with landowner and explore schemes for site.</p> <p>Could form part of a detailed masterplan / design study.</p>
OM7	RBC Depot and Job Centre	Delivery of a residential-led scheme with ancillary flexible commercial ground floor.	Old Market	Both the Depot and Job centre are in active use. However, RBC are keen to relocate the Depot's activity elsewhere to release the site. At present, no engagement or feasibility studies have been carried out.	Thorncroft Investments, RBC	Council to consider self-delivery or look to partner with landowner to deliver scheme.	Medium term	Medium	N/A	<ul style="list-style-type: none"> Leverages council owned assets to make meaningful change. Introduction of a new housing offer type which delivers an increasingly balanced housing offer. Delivery of residential and new leisure / retail floorspace increases the mix of uses securing greater resilience in the town centre. 	<p>Council to engage with landowners and businesses to determine their future ambitions for the site, and whether there is an opportunity for redevelopment. It may be that potential acquisition is required on the third party land.</p> <p>Given the activity on the site, there may need to be a parallel investigation in terms of finding an alternative site for the Depot.</p> <p>The Council should undertake a detailed design and feasibility study to determine an optimal scheme to take forward.</p>
OM10	Gas Street Car Park	Potentially some residential development, but alternatively consideration as new location for Market.	Old Market	The car parks are in active use and no immediate schemes have been proposed.	RBC	Council to determine most appropriate approach. Could look to undertake direct delivery or procure a private sector development partner via a Joint Venture.	Medium term	Medium / High	NP3: Car Parking Strategy Market relocation study (on-going)	<ul style="list-style-type: none"> Leverages council owned assets to make meaningful change. Introduction of a new housing offer type which delivers an increasingly balanced housing offer. Potential delivery of a new market, to animate the location and diversify the offer. 	<p>Council to commission town centre wide car parking study to identify when the surface car parking can be released.</p> <p>In parallel, the outcome of the market study needs to be confirmed.</p> <p>A site remediation study is required to understand the extent of the historic gas works within the site.</p> <p>The council should undertake a detailed design and feasibility study to identify a suitable scheme.</p>



Ref	Name	Description of potential development options	Character Areas	Status	Ownership	Delivery Responsibility	Timescales	Cost	Interdependencies	Outcome(s) / Theme Alignment	Next Steps
OT11	Chestnut House	A potential location for Rugby Hub or a new Grade A office. This scheme could help create a new focal point for the town centre and improve the commercial offering.	Old Town	At present, the site is occupied by professional services businesses. At present, there are no immediate proposals for redevelopment.	Astra Court Management, Private	Council to consider self-delivery or partner with the Local Enterprise Partnership (LEP) to deliver the Grade A offices.	Medium term	Medium	Rugby Hub Study (on-going)	<ul style="list-style-type: none"> • Delivery of office floorspace increases the mix of uses securing greater resilience in the town centre. • Will help support SMEs and businesses, and growth in the local economy. 	<p>Council to review the outcome of the Rugby Hub study, and whether this is a suitable location.</p> <p>The Council should look to acquire the site, to gain control for delivery.</p> <p>The Council should engage with the LEP.</p>
OT13	Church / North Street Retail Frontage	Proposal includes creating a new cut through one of the retail units to improve connections between the High Street and this character area. Rather than redevelopment, the retail parade will be retrofitted to deliver new residential with the retail ground floors preserved.	Old Town	At present, there are no proposals for the retail parade. They are still occupied. No engagement has occurred.	Rugby One	Council should consider opportunities to partner with the landowners to bring forward delivery. Could consider support delivered through access of funding for new route/ cut-through.	Medium term	Medium	N/A	<ul style="list-style-type: none"> • Deliver a movement network that enables safe, active and sustainable localised journeys. • Delivery of new leisure and retail floorspace increases the mix of uses securing greater resilience in the town centre. 	<p>The Council should seek to engage with the landowner to determine their ambitions.</p> <p>The Council should explore and conduct a business relocation study to determine the impact on the existing businesses and whether there is an opportunity to retain them on the site.</p> <p>In parallel a detailed design and feasibility study should be conducted to understand the most suitable options for the site.</p>
HS14	Herbert Gray College Redevelopment	Redevelopment of the listed college to deliver a new hotel. This scheme includes a part retrofit to preserve the heritage elements of the building.	High Street	<p>A planning application was submitted to convert the college into a 'luxury' extra care scheme. The proposal set out the intention to deliver "two-5 storey blocks to form 78 Extra Care Residential Units (Class C2), a 3-storey 52-bed Care Home (Class C2) and an ancillary Well Being Centre (including café, restaurant and leisure/spa facilities), together with associated works, including alterations to boundaries."</p> <p>At this stage, the planning permission has not been implemented. Dependent on the applicant's future ambition, the site may be available for redevelopment.</p>	Caldecott Square	Private sector delivery by developer. Council should proactively engage to steer new development or look at opportunities for self-delivery.	Medium term	High	N/A	<ul style="list-style-type: none"> • Respecting existing heritage by creating assets for the future. • Refurbishment of existing buildings contributes to addressing the climate emergency. 	The Council should engage with the developer to identify whether there is an opportunity to partner and deliver the new uses on the site.
HS15	Market Place	Proposals include a retrofit of the retail units and upper floors to provide new flexible commercial uses.	High Street	At present, no engagement or planning application has been submitted.	Glendine Development, Kin Yip Properties	Council to consider opportunities to partner with landowners and support delivery through unlocking funding.	Medium term	Low	N/A	Delivery of new leisure / retail / workspace floorspace increases the mix of uses securing greater resilience in the town centre.	<p>The Council needs to engage with landowners and businesses.</p> <p>The Council should seek to understand the development opportunity through detailed site feasibility studies.</p>
HS17	34 High Street 11-14 Sheep Street	Proposals seek to retrofit the building to deliver new retail, leisure and food and beverage (F&B) uses.	High Street	The property is currently occupied. At present, no engagement or planning application has been submitted.	Hope Mens & Ladies Clothing, Private	Council to consider opportunities to partner with landowners and support delivery through unlocking funding.	Medium term	Low	N/A	• Delivery of new residential / leisure / retail / workspace floorspace increases the mix of uses securing greater resilience in the town centre.	The Council should seek to understand the development opportunity through detailed site feasibility studies.



Ref	Name	Description of potential development options	Character Areas	Status	Ownership	Delivery Responsibility	Timescales	Cost	Interdependencies	Outcome(s) / Theme Alignment	Next Steps
RC20	Rugby Central Phase 1	Part redevelopment of the shopping centre's eastern entrance and shopping parade to delivering new improved retail units, a new entrance and gateway along North Street and two blocks comprising 210 flats.	Rugby Central	<p>Planning permission has been submitted by RunningHare. The proposal comprises:</p> <p>"Demolition of part of Rugby Central Shopping Centre and the erection of a mixed-use development scheme in two separate blocks, both 7 storeys in height providing commercial floorspace within Use Class E of the Town and Country Planning (Use Classes) Order 1987 (as amended) and sui generis floorspace (bar or public house) on the ground floor and residential (Class C3) on the upper floors together with new public realm, hard and soft landscaping, roof top amenity space, cycle storage, refuse storage, plant rooms, a replacement shop front for Unit 3a Manning Walk, revised servicing arrangements, associated infrastructure and works."</p> <p>No decision has been made.</p>	Karenor Partners Ltd	Private sector delivery by developer. Council should proactively engage to steer new development as it progresses through planning.	Medium term	High	NP4: Bus Strategy	<ul style="list-style-type: none"> • Delivery of new retail / food and beverage, increases the mix of uses securing greater resilience in the town centre. • Introduction of a new housing offer type which delivers an increasingly balanced housing offer. • Create opportunities to deliver new routes to improve permeability for pedestrians. 	<p>The Council needs to engage with the developer to steer the proposal and the uses coming forward.</p> <p>The application includes amendments to the bus standing on North Street that should be linked to a wider bus and movement study. There should be coordinated with the recommendation set out.</p>
SG1	Royal Mail and MSCP	Redevelopment of the Royal Mail and Car Park site, north of the station to deliver a residential-led scheme. Density of development in this location, alongside other parcels in Character Area Station Gateway (SG) could support improvement of Mill Road underpass, and wider connectivity around the station.	Station Gateway	<p>No immediate plans for redevelopment.</p> <p>Will require engagement with Royal Mail and Madeley Development Ltd on future ambition for sites.</p> <p>Detailed design and site feasibility studies will need to be conducted, and land assembly.</p>	Royal Mail Madeley Developments Limited	Council to consider station gateway masterplan and procure private sector development partner / consider Joint Venture.	Medium / Long term	High	N/A	<ul style="list-style-type: none"> • Enables a diverse mix of homes to come forward in line with investment already present (Market Quarter). • Create opportunity to deliver new open spaces as part of the residential redevelopment. 	<p>Council to engage with landowners and explore schemes for site.</p> <p>Land assembly will be required.</p> <p>Could form part of a detailed masterplan / design study for the Station area.</p>
HS19	RAGM + Car Park redevelopment	Proposals seek to consider this one of the alternative locations for Rugby Hub. If delivered here, this would be alongside new commercial uses, including retail, leisure and food and beverage.	High Street	RAGM is currently operational but has been under review. A new location for the current uses has not been secured. The car park remains in use by ASDA.	RBC, Private	Council responsibility to determine most appropriate approach. Could look to undertake direct delivery or procure a private sector development partner via a Joint Venture.	Medium / Long term	Medium / High	NP3: Car Parking Strategy Rugby Hub Study (on-going)	<ul style="list-style-type: none"> • Delivery of new leisure / retail / workspace floorspace increases the mix of uses securing greater resilience in the town centre. • Create opportunities to deliver greater public realm. 	<p>Dependent on the outcome of the Rugby Hub study. Will require engagement with private landowner (we believe is ASDA) on the car parking spaces. Will require the Council to commission a car parking study that encapsulates both public and private car parks across the town centre.</p> <p>RBC need to commission study to determine the best alternative location for RAGM, if the study identifies this is the best location for Rugby Hub. Or alternatively if the site has capacity for the two uses (or more) to coexist on the site.</p>



Ref	Name	Description of potential development options	Character Areas	Status	Ownership	Delivery Responsibility	Timescales	Cost	Interdependencies	Outcome(s) / Theme Alignment	Next Steps
TH26	Police Station	An interceptor car park and residential is proposed.	Town Hall	The property is currently occupied and is an important public service. It is understood, that the Warwickshire Police have been undertaking their own review of their asset requirements in the town centre. At present, no engagement or planning application has been submitted.	The Association Of Police And Crime Commissioners	Council responsibility to determine most appropriate approach. Could look to undertake direct delivery or procure a private sector development partner via a Joint Venture.	Long term	Medium	N/A	<ul style="list-style-type: none"> • Introduction of a new housing offer type which delivers an increasingly balanced housing offer. • Will deliver an interceptor car park to enable a shift towards more sustainable modes of transport across the town centre. 	<p>Within Public sector ownership. Need to engage to understand if an alternative site can be provided.</p> <p>RBC should consider acquisition of the site to control delivery of interceptor car park in the short/medium term.</p>
WE5	NHS Railings	Redevelopment of the NHS Sidings, to deliver new homes, aligned with the wider residential development within Webb Ellis Estate.	Webb Ellis	NHS Sidings is still operational. Engagement with the NHS will be required to understand if the site is still suitable given the development delivery in the immediate vicinity. This will determine when the site could be considered for redevelopment and potentially through the One Public Estate mechanism.	Coventry and Warwickshire Award Trust	Council to potentially lead on discussions for OPE programme or look to consider self-delivery.	Long term	Medium	N/A	<ul style="list-style-type: none"> • Enables a diverse mix of homes to come forward in line with investment already present (Market Quarter) 	<p>Council to lead on discussions for OPE programme with NHS Trust and LGA.</p> <p>May require strategic overview of all public assets, to determine opportunities for an integrated healthcare hub.</p>
SG2	Network Rail Station Car Park	Redevelopment of the surface car park to provide residential, flatted / Build to Rent accommodation.	Station Gateway	No immediate plans for redevelopment. The site remains an active car park for the station. Release of the site will be dependent on a comprehensive car parking study. Will require engagement with Network Rail alongside this.	Network Rail	Council to consider station gateway masterplan and procure private sector development partner / consider Joint Venture.	Long term	Medium	NP3: Car Parking Strategy	<ul style="list-style-type: none"> • Enables a diverse mix of homes to come forward in line with investment already present (Market Quarter). • Creates means to consider sustainable transport improvements. 	<p>Council to commission town centre wide car parking study.</p> <p>Engage with Network Rail to determine if the site needs to be retained for parking or is tied to any access and servicing maintenance for the railway.</p> <p>Could form part of a detailed masterplan / design study.</p>
WE6	Industrial redevelopment	Reprovision of industrial stock, to deliver an intensified, co-location scheme (industrial and workspace).	Webb Ellis	Units are well occupied at present. This should come forward as the industrial stock begins to become dilapidated or no longer fit-for-purpose. A more detailed masterplanning process is required to understand and articulate the potential of the site as a whole. This process, which requires engagement with landowners, is needed to provide more detailed delivery advice.	Multiple Freeholders and leases	Council to guide redevelopment through planning framework, through site allocation process or look to proceed with land assembly and delivery.	Long term	Medium	N/A	<ul style="list-style-type: none"> • Boost employment floorspace to support economic growth. 	<p>The council should engage with landowners and tenants to determine the current ambitions for the area.</p> <p>The council should consider acquisition of the units, to be held on an investment basis till wider site assembly (and control) can be achieved.</p> <p>A relocation study and business tenancy schedule may be required in parallel, to ensure as many businesses can be retained in Rugby.</p> <p>Detailed masterplanning should then sought to determine a suitable scheme.</p>



Ref	Name	Description of potential development options	Character Areas	Status	Ownership	Delivery Responsibility	Timescales	Cost	Interdependencies	Outcome(s) / Theme Alignment	Next Steps
OM8	BT Building	Delivery of a residential-led scheme with ancillary flexible commercial ground floor.	Old Market	Historically, the old exchange has been converted to office and is occupied by tenants that include Architects. The other half of the property (which is separate) is still operational. At this stage, engagement with BT on their operations has not been conducted and there are no current plans for redevelopment. However, previous examples identifies that finding alternative sites for BT operations can be difficult and lengthy. This will therefore be long term opportunity.	BT	Council to guide redevelopment through planning framework, through site allocation process or look to proceed with land assembly and delivery in the long term.	Long term	High	N/A	<ul style="list-style-type: none"> • Introduction of a new housing offer type which delivers an increasingly balanced housing offer. • Delivery of residential and new leisure / retail floorspace increases the mix of uses securing greater resilience in the town centre. 	Council to engage with BT on their future operations and requirements of the site. The council should earmark this site for residential, mixed use development to guide future delivery.
OM9	John Barford redevelopment	Redevelopment of the Multi Storey Car Park (MSCP) to provide new residential, and flexible commercial ground floors.	Old Market	The MSCP and surface car park is still in active use, although occupancy rates are relatively modest. There are no immediate plans for redevelopment.	RBC, Private	Council to determine most appropriate approach. Could look to undertake direct delivery or procure a private sector development partner via a Joint Venture.	Long term	High	NP3: Car Parking Strategy	<ul style="list-style-type: none"> • Introduction of a new housing offer type which delivers an increasingly balanced housing offer. • Delivery of residential and new leisure / retail floorspace increases the mix of uses securing greater resilience in the town centre. 	<p>Council to commission town centre wide car parking study. Identify the appropriate phasing for MSCP, and when it can be released for development.</p> <p>The Council should seek to acquire the privately owned car parking site and hold the investment interest till comprehensive redevelopment can occur.</p>
OT12	Banks redevelopment	Proposal for the reprovion of the commercial floorspace to consider workspace and new retail, to deliver new modern units, fit for purpose.	Old Town	As we understand, the presence of banks on High Streets may become obsolete as they move services online. We anticipate this will occur in the medium to long term, in line with lease terms. Looking forward, the Council should proactively address new uses that could come forward in this location and suitable schemes. This will additionally become of greater relevance with the redevelopment of Rugby Central Phase 1 and the improvement of the entrances and new routes aimed to be created as part of these proposals. No immediate schemes have been proposed at present.	Sharplink, RBC	<p>Council to look to support the redevelopment in the longer term.</p> <p>Council should consider engaging the LEP to determine if there are opportunities to bring forward commercial schemes.</p>	Long term	Medium	NP3: Car Parking Strategy	<ul style="list-style-type: none"> • Delivery of new leisure / retail / office floorspace increases the mix of uses securing greater resilience in the town centre. 	<p>Council to commission town centre wide car parking study to identify when the surface car parking can be released.</p> <p>The council should earmark the site as a redevelopment opportunity and steer delivery through planning framework.</p>



Ref	Name	Description of potential development options	Character Areas	Status	Ownership	Delivery Responsibility	Timescales	Cost	Interdependencies	Outcome(s) / Theme Alignment	Next Steps
RC21	Rugby Central Phase 2 (Multi Storey Car Park conversion)	Comprehensive redevelopment to remove the 'blank façade' from the MSCP and deliver new homes, flexible commercial uses including a hotel.	Rugby Central	There has been engagement with Runninghare in the past, but there are no plans for a partnership approach. Some consideration has been given to site assembly required and the feasibility of releasing the car parking for alternative use. However this was a high level concept, and no immediate studies have been done.	Multiple ownership (including RBC)	Given the likely complexity with delivering this site, the Council should steer delivery. Could look to undertake direct delivery or procure a private sector development partner via a Joint Venture.	Long term	High	M2: Convert Evreux Way roundabout to a signalised junction and create high-quality gateway to Rugby town centre. CSW23: Big Box Retail, Fire Station CSW24: Morgan Sindall CSW25: Westlands	<ul style="list-style-type: none"> • Introduction of a new housing offer type which delivers an increasingly balanced housing offer. • Delivery of new leisure / retail / workspace floorspace increases the mix of uses securing greater resilience in the town centre. • Will create new routes and permeability, improving the opportunities to prioritise sustainable modes of transport. 	<p>Will be hinged on Council commissioning a comprehensive car parking study.</p> <p>Land assembly may be required over the medium term.</p> <p>This would require comprehensive masterplanning, to determine the best scheme.</p> <p>Council could look to procure development partner.</p>
RC22	Retrofit period buildings	This seeks to retrofit the properties with deliver new residential accommodation. The proposals seek to retain the historic facades.	Rugby Central	The properties are currently occupied. At present, no engagement or planning application has been submitted.	Multiple ownerships (fragmented)	Council to guide development through planning framework.	Long term	Low	N/A	<ul style="list-style-type: none"> • Introduction of a new housing offer type which delivers an increasingly balanced housing offer. • Respecting existing heritage by preserving and enhancing period facades. 	<p>Council to engage with landowners and determine future ambitions.</p> <p>Council to scope out feasibility of delivering retrofit scheme.</p>
CSW23	Big Box Retail, Fire Station	Across the development parcel, new residential is proposed, this will include a mixture of homes and flats.	Corporation Street West	The properties are currently in use, some of which serve important public services. At present, no engagement or planning application has been submitted.	T. J. Morris Limited, RBC	Council responsibility to determine most appropriate approach. Could look to undertake direct delivery or procure a private sector development partner via a Joint Venture.	Long term	Medium	M2: Convert Evreux Way roundabout to a signalised junction and create high-quality gateway to Rugby town centre. RC21: Rugby Central Phase 2 (Multi Storey Car Park conversion)	<ul style="list-style-type: none"> • Introduction of a new housing offer type which delivers an increasingly balanced housing offer. 	<p>The Council needs to engage with landowner and businesses.</p> <p>Site acquisition to be considered to control delivery.</p> <p>Detailed feasibility study required to determine scheme.</p>
CSW24	Morgan Sindall	A flatted residential scheme is proposed to be delivered.	Corporation Street West	Potential for long term redevelopment for residential is identified, subject to and assuming the retention of Morgan Sindall within the town centre.	Sreit (No. 2) Limited	Council responsibility to determine most appropriate approach. Could look to undertake direct delivery or procure a private sector development partner via a Joint Venture.	Long term	Medium	M2: Convert Evreux Way roundabout to a signalised junction and create high-quality gateway to Rugby town centre. RC21: Rugby Central Phase 2 (Multi Storey Car Park conversion)	<ul style="list-style-type: none"> • Introduction of a new housing offer type which delivers an increasingly balanced housing offer. 	<p>The Council needs to engage with landowner and businesses.</p> <p>Site acquisition to be considered to control delivery.</p> <p>Detailed feasibility study required to determine scheme.</p>
CSW25	Westlands	New residential that could include new houses, or extra care scheme.	Corporation Street West	The property is currently occupied. At present, no engagement or planning application has been submitted.	WCS Care Group Limited	Council responsibility to determine most appropriate approach. Could look to undertake direct delivery or procure a private sector development partner via a Joint Venture.	Long term	Medium	M2: Convert Evreux Way roundabout to a signalised junction and create high-quality gateway to Rugby town centre. RC21: Rugby Central Phase 2 (Multi Storey Car Park conversion)	<ul style="list-style-type: none"> • Introduction of a new housing offer type which delivers an increasingly balanced housing offer. 	<p>The Council needs to engage with landowner and businesses.</p> <p>Site acquisition to be considered to control delivery.</p> <p>Detailed feasibility study required to determine scheme.</p>



MOVEMENT AND PUBLIC REALM INTERVENTIONS

 Council-led
 Council Supported
 Council as Statutory Authority

Ref	Name	Description	Character Areas	Status	Ownership	Delivery Responsibility	Funding Source	Cost	Timescales	Interdependencies	Outcome(s) / Theme Alignment	Next Steps
PR6	Improve public realm on Sheep Street and High Street, and adjoining side roads and alleys	Refresh these streets and spaces including repaving, lighting, street furniture, planting and shop front improvements.	High Street	No studies or actions have taken place.	WCC	WCC with an active role by RBC in the process, to ensure that the identified measures are in line with local needs and longer term aspirations.	High Streets Fund	High	Short term	OT13: Church Street / North Street	<ul style="list-style-type: none"> Brings to life these important historic streets and better connects them to the wider area Helps improve conditions for existing businesses and enables new businesses to open up 	Commission a public realm specialist with support from movement planning to undertake a study (RIBA Stage 2/3) to identify a series of costed measures to improve the quality of these streets and spaces including potential meanwhile / event spaces.
MS1	Area wide: Improve pedestrian and cycle access on existing routes	Improve key routes, links and spaces for pedestrians and cyclists including crossings, junction improvements, signage, cycle infrastructure, lighting, seating, and green infrastructure.	ALL	Can build on the WCC Local Cycling and Walking Improvement Plan (LCWIP)	WCC	WCC including transport planning, highways and public realm specialists. Recommended that RBC play an active role in reviewing proposed schemes and the approval process.	N/A	High	Short term	N/A	<ul style="list-style-type: none"> Enables more local trips to be undertaken by active travel Improves sustainable connectivity between the town centre, existing and future neighbourhoods Helps reduce the negative impacts of vehicles on the local environment Helps to meet climate emergency targets 	Building on the LCWIP, work with WCC to bring forward improvements on-street.
MS3	Area wide: Create greenway/cyclist Quietway	Create high-quality quiet routes and links for cyclists (and pedestrians) that improve access, movement and connectivity to key attractors including the town centre, schools, retail parks, hospitals and green spaces. This could include relocation / rationalisation of parking, cycle infrastructure, junction and crossing improvements and secure cycle parking.	ALL	Can build on the WCC Local Cycling and Walking Improvement Plan (LCWIP)	WCC	WCC including transport planning, highways and public realm specialists with support from RBC	N/A	High	Short term	N/A	<ul style="list-style-type: none"> Enables more local trips to be undertaken by active travel Improves connectivity between the town centre, existing and future neighbourhoods Helps reduce the negative impacts of vehicles on the local environment Helps to meet climate emergency and air quality targets 	Building on the LCWIP, work with WCC to bring forward improvements on-street.
MS4	Area wide: Improve junctions and crossings for pedestrians and cyclists	Improve junctions for pedestrians and cyclists, improve existing, and introduce additional pedestrian and cyclist crossings.	ALL	Can build on the WCC Local Cycling and Walking Improvement Plan LCWIP	WCC	WCC including transport planning, highways and public realm specialists with support from RBC	N/A	High	Short term	N/A	<ul style="list-style-type: none"> Reduces over reliance on private vehicles, particularly for short journeys Reduces severance Improves road and personal security Helps to meet climate emergency and air quality targets 	Building on the LCWIP, work with WCC to bring forward improvements.



Ref	Name	Description	Character Areas	Status	Ownership	Delivery Responsibility	Funding Source	Cost	Timescales	Interdependencies	Outcome(s) / Theme Alignment	Next Steps
M1	Improve pedestrian and cyclist permeability through Westway	Improve the quality of this link for pedestrians and cyclists including personal security.	N/A		WCC	WCC including transport planning highways and public realm specialists.	N/A	Medium	Short term	RC20: Rugby Central Phase 1 RC21: Rugby Central Phase 2 (Multi Storey Car Park conversion)	<ul style="list-style-type: none"> Improves pedestrian connectivity to a currently severed neighbourhood 	Liaise with WCC to identify measures and associated funding to improve this link.
M3	Improve Rugby Station pedestrian and cyclist connectivity along Railway Terrace	Create a high quality link between Rugby station for pedestrians and cyclists including footway, junction and crossing improvements, lighting, seating and public realm measures.	Station Gateway		WCC	WCC. Recommend commissioning a public realm-led consultancy with support from transport planning to undertake study. RBC should be an active stakeholder in the project to ensure measures delivered are in line with masterplan framework principles.	N/A	High	Short term	N/A	<ul style="list-style-type: none"> Improves the relationship between Rugby station and the town centre Improves pedestrian and cyclist enjoyment and safety Encourages greater number of trips by active travel 	Undertake a RIBA Stage 2/3 design review and develop up costed options for creating a high-quality link between the station and town centre. Project should be lead by public realm designers, supported by transport/movement experts.
M1E	Improve pedestrian and cyclist access on Lawrence Sheriff Street	Create a more pedestrian friendly environment that links High Street / Sheep Street to Lawrence Sheriff Street and wider area.	N/A		WCC	WCC including transport planning highways and public realm specialists.	N/A	Low	Short term	N/A	<ul style="list-style-type: none"> Improves connectivity Improves road safety Improve sense of place 	Undertake a RIBA Stage 2/3 review of the existing situation and identify opportunities to improve the look and feel of this environment, footways, potential crossing and traffic calming measures.
M1F	Improve existing car parks	Improve wayfinding, access arrangements, parking layouts, ticketing and signage to existing car parks to reduce the impacts of vehicles on the local network, improve utilisation of currently under used car parks and enable temporary car park closures for pop up events.	N/A		RBC	Parking Services, Planning, Transport Planning and Public Realm specialists. Support required by WCC Highways and transport planning if changes are recommended to the highway and road signage.	N/A	Low - Medium	Short term	N/A	<ul style="list-style-type: none"> Improves parking management Reduces the impact of vehicles on the local network Maximises underutilised parking assets 	As part of a Development Enabling Study, see non-physical interventions for more detail, identify measures and make recommendations on how to improve existing car parks.
PRS1	Area wide: Indicative location of street tree planting	Delivering street tree planting alongside development projects and new routes established through the framework.	All	To be aligned with development projects coming forward and through the creation of new routes identified in the framework. This is early in its conception and no plans have been finalised.	RBC / WCC Multiple ownerships	RBC to coordinate with delivery of sites coming forward across the plan	The national lottery heritage fund. S106/ CIL	Low - Medium	Short/ Medium Term	All development projects	<ul style="list-style-type: none"> Improves public realm environment and contributes to addressing climate emergency 	<p>Coordinate with Development Services (Planning), Landscape and, Parks and Recreation officers on tree planting for new developments</p> <p>Identify scope and extent of project to support business case for funding (if required)</p> <p>Targeted action plan to identify precise locations and species.</p>



Ref	Name	Description	Character Areas	Status	Ownership	Delivery Responsibility	Funding Source	Cost	Timescales	Interdependencies	Outcome(s) / Theme Alignment	Next Steps
PR3	New green space by The Retreat	Delivering a new green public space by the proposed location for new commercial (Hotel). This will support creating outdoor locations for residents and visitors to dwell.	Town Hall	No studies or actions have taken place	RBC	RBC to coordinate with development proposals for Town Hall site (TH26).	May be part of S106	Medium	Short/ Medium term	TH26: Town Hall	<ul style="list-style-type: none"> Better supports existing and future local businesses and enterprise through unlocking of more public space and greater activation of the street Improve access and enjoyment of public space and green space. 	<p>Identify opportunity to deliver as part of the development opportunities for Town Hall.</p> <p>Determine whether S106 monies can be used, or whether external funding needs to be considered.</p>
MS6	Other area wide: electric car / van hire clubs, cycle / scooter hire scheme, cargo bike (pedal / electric) hire scheme, last mile delivery hubs	Better integrate alternative active travel and sustainable mode options into the town centre, surrounding existing and future neighbourhoods, schools, hospitals, retail parks, employment areas and other attractors.	ALL		WCC	WCC including transport planning highways and public realm specialists.	N/A	Medium - High	Short/ medium term	N/A	<ul style="list-style-type: none"> Reduces the overreliance on the private vehicle to travel to, from and around Rugby, particularly for short and medium distance journeys Better integrates existing and future neighbourhoods and employment areas Improves air quality and fully supports the national response to climate emergency 	Prepare a spatial plan that identifies appropriate locations for these schemes that enable greater take up of these modes but which do not have an undue impact on other road users, quality of the public realm and future development opportunities.
PR1A	High quality town centre public realm scheme on North Street and Church Street, and adjoining streets and alleyways	The creation of a high quality town centre public realm scheme that better reflects its historical setting. Including the rationalisation and relocation of movement functions, reallocation of road space for placemaking measures, clutter removal, pedestrian crossings, shop front improvements and street greening.	Old Town	There have been previous studies undertaken in this area which will require appraisal.	WCC	<p>WCC including transport planning, highways and public realm specialists with support from RBC</p> <p>It is recommended that RBC play a significant role in project brief development and the commission procurement process as well as being an active stakeholder as part of design decisions</p>	S106/ CIL	High	Medium term	<p>RC20: Rugby Central Phase 1</p> <p>RC21: Rugby Central Phase 2 (Multi Storey Car Park conversion)</p>	<p>Encourages a greater number of visitors</p> <p>More dwelling and enjoyment throughout the day, week and year</p> <p>Better supports existing and future local businesses and enterprise through unlocking of more public space and greater activation of the street</p> <p>Improves access and movement for pedestrians, cyclists, buses, and taxis</p> <p>Reduces the negative impacts of vehicles including air quality and physical barriers to pedestrians and cyclists</p> <p>Improve access and enjoyment of public space and green space</p>	<p>Commission a feasibility study (RIBA Stage 2/3) that builds on the vision and principles of the masterplan to develop concepts and a costed delivery strategy for Church Street / North Street. It is recommended that high video camera surveys and a comprehensive engagement exercise is undertaken as part of the project.</p> <p>It is recommended the project is led by public realm specialists with support from sustainability, urban design, transport planning, engineering, consultation, and cost specialists.</p> <p>Bus operators and taxis will require careful consideration.</p>



Ref	Name	Description	Character Areas	Status	Ownership	Delivery Responsibility	Funding Source	Cost	Timescales	Interdependencies	Outcome(s) / Theme Alignment	Next Steps
PR1B	Evreux Way and Caldecott park gateway public improvements	Would include changes to the existing road layout on Evreux Way to encourage more walking and cycling, as well as better integration of surrounding existing and future development, crossings and green / blue infrastructure. Should include improvements to the entrance and setting of Caldecott Park and its relationship with the town centre.	N/A	No studies or actions have taken place.	WCC / RBC	WCC including transport planning, highways and public realm specialists with support from RBC. It is recommended that RBC play a significant role in project brief development and the commission procurement process as well as being an active stakeholder as part of design decisions.	S106/ CIL	High	Medium term (subject to what happens to the McDonald site / Town Hall)	M2: Convert Evreux Way roundabout to a signalised junction and create high-quality gateway to Rugby town centre. OT13: North Street / Church Street RC20: Rugby Central Phase 1 RC21: Rugby Central Phase 2 (Multi Storey Car Park conversion) TH27: Town Hall	<ul style="list-style-type: none"> Improves connectivity particularly for sustainable and active travel modes Improves access to green space Better integrates green space into the wider town centre Enables more appropriate development to come forward and to better integrate it into existing town centre streets 	<p>Commission a consultancy to undertake a feasibility study (RIBA Stage 2/3) that builds on the vision and principles of the masterplan to develop concepts and a costed delivery strategy. It is recommended that high mast video camera surveys and a comprehensive engagement exercise is undertaken as part of the project.</p> <p>It is recommended the project is led by public realm specialists with support from sustainability, urban design, transport planning, engineering, consultation, and cost specialists.</p>
PR1	New courtyard by Windmill Lane	Delivering a courtyard as part of the North Street development proposals, to create a new courtyard / cut-through into Old Town.	Old Town	No studies or actions have taken place	Rugby One	RBC to coordinate with landowner, and part of redevelopment negotiations for retrofit / redevelopment proposals.	May be part of S106	Medium	Medium term	OT13: Church / North Street Retail Frontage	Improve permeability and increases walking routes	Engage with landowner over redevelopment proposals.
PR2	New public space on existing Asda car park	Delivering a new green public space as part of the redevelopment proposals for RAGM. This will help to soften the current landscape and provide a new place to 'pause' in the High Street.	High Street	No studies or actions have taken place	Private (ASDA)	RBC as part of development proposals for RAGM (HS19)	May be part of S106	Medium	Medium term	HS19: RAGM + Car Park redevelopment	<ul style="list-style-type: none"> Better supports existing and future local businesses and enterprise through unlocking of more public space and greater activation of the street Improve access and enjoyment of public space and green space. 	Engage with ASDA and coordinate with plans for RAGM redevelopment.
PR4	New public space by North Street	Delivery of a new public space, orientated around the redevelopment of North Street car park. Creates a new meeting point and central focus for the anticipated employees from the commercial offering.	Old Town	No studies or actions have taken place	RBC	RBC to coordinate with delivering of development in Old Town (Rugby Hub or new commercial).	May be part of S106	Medium	Medium term	OT11: Chestnut House OT13: Church / North Street Retail Frontage: NP3: Car parking study	<ul style="list-style-type: none"> Better supports existing and future local businesses and enterprise through unlocking of more public space and greater activation of the street Improve access and enjoyment of public space and green space. 	<p>Identify opportunity to deliver as part of the development opportunities for Old Town</p> <p>Determine whether S106 monies can be used, or whether external funding needs to be considered.</p>
MS2	Area wide: Increase pedestrian and cyclist permeability and wayfinding as part of new development	Increase routes, links and access for sustainable and active travel as part of new development	ALL	In corporate as part of future planning policy documents	RBC	RBC Development Services	N/A	Medium - High	Medium - longer term as	N/A	<ul style="list-style-type: none"> Enables more sustainable development to come forward and encourages existing and future access by active travel Reduces severance Improves road / personal safety Improves sense of place Helps to meet climate emergency and air quality targets 	Review existing planning policy and where possible incorporate a sustainable and active travel strategy.



Ref	Name	Description	Character Areas	Status	Ownership	Delivery Responsibility	Funding Source	Cost	Timescales	Interdependencies	Outcome(s) / Theme Alignment	Next Steps
MS5	Area wide: Improve bus connectivity, accessibility and reliability	The creation of an integrated, fully accessible, affordable, well connected, reliable, and sustainable bus system. Better connect Rugby, its existing and future hinterlands with an appropriate hierarchy of bus routes and types, ranging from bus rapid transit on strategic routes, to local on-demand hopper buses within local neighbourhoods and rural locations.	ALL	Can build on the WCC Local Cycling and Walking Improvement Plan LCWIP	WCC with active involvement from RBC as part of a steering group to review emerging ideas and schemes.	WCC with active involvement of RBC and bus operators.	N/A	High	Medium - longer term	N/A	<ul style="list-style-type: none"> Reduces the overreliance on the private vehicle to travel to, from and around Rugby, particularly for short and medium distance journeys Reduces poverty and improve health and well-being, particularly for those who are reliant on public transport to get to and from work and education Improves air quality and fully supports the national response to climate emergency. 	It is recommended that a comprehensive bus study is undertaken for Rugby and the regions. The study would look to set up partnership working with bus operators, key stakeholders, and the local community to review the existing bus vehicles, services, routes and stops. This comprehensive review would culminate in a phased masterplan for buses including as short-, medium- and longer-term projects and measures to improve the bus system. Greater emphasis should be given to innovation, technology, and sustainability to help ensure the long-term role of buses.
M5	Improve railway crossings for pedestrians and cyclist	Improve road safety, personal security and accessibility at these key crossings to reduce the severance caused by the railway tracks for walking and cycling I	N/A	N/A	WCC	WCC including transport planning, highways and public realm specialists	N/A	Medium/high	Medium - longer term	N/a	<ul style="list-style-type: none"> Reduces severance caused by the railway tracks Helps reduce over reliance on private vehicles for short journeys 	Liaise with WCC to identify measures that could be introduced over the short, medium and longer term to improve these key environment
MS7	Elliott's Field Sustainable Connectivity	Improve sustainable and active travel between the town centre, Rugby Railway Station and Elliott's Field. This could include improvements to existing bus services, reliability and fares, pedestrian and cyclist crossing / infrastructure improvements, electric vehicle and cycling parking. A shuttle bus between the town centre, Rugby Railway Station and Elliott's Fields may also be considered.	N/A	No studies or actions have taken place	WCC	WCC including transport planning highways and public realm specialists.	N/A	Medium/high	Short / Medium term		<ul style="list-style-type: none"> Reduces traffic congestion and associated negative impacts including air quality and poor road safety Encourages greater footfall within the town centre Encourages greater take up of more sustainable and active travel Improves road safety for pedestrians and cyclists Better connects existing and future developments 	Review existing routes, links and crossings to identify short, medium and longer term measures to improve sustainable and active travel to and from Elliott's Field to the town centre, station and wider area. Working with bus operators, identify improvements to existing bus services, including routing, bus priority measures, bus stop improvements and fares. Also explore the opportunity for a shuttle bus service between the retail park, station and town centre. Work with the retail park to review the existing parking system to encourage more people to arrive by bus, walking and cycling



Ref	Name	Description	Character Areas	Status	Ownership	Delivery Responsibility	Funding Source	Cost	Timescales	Interdependencies	Outcome(s) / Theme Alignment	Next Steps
PR5	New public space on existing Old Market Place car park	Delivering new public realm and green space on the surface car park.	Old Market	No studies or actions have taken place	RBC	RBC to coordinate alongside John Barford MSCP redevelopment.	The national lottery heritage fund Council's reserves	Medium/high	Long term	OM9: John Barford redevelopment	<ul style="list-style-type: none"> Improve access and enjoyment of public space and green space. 	<p>Needs to align with car parking study, and timescales for release.</p> <p>Need to coordinate whether this could come forward as part of the redevelopment of John Barford MSCP or in isolation as a first phase.</p>
PR7	Create iconic gateway environment around Rugby School gyratory	Major redesign of the gyratory, including consideration of two-way working and potential closure / partial closure of a junction arm to create a place for people and a high quality people-led gateway to the town centre.	N/A	No studies or actions have taken place.	WCC	<p>WCC including transport planning, highways and public realm specialists with support from RBC.</p> <p>It is recommended that RBC play a significant role in the project brief development and procurement process as well as being an active stakeholder as part of design decisions.</p>	N/A	High	Longer term	<p>M2: Convert Evreux Way roundabout to a signalised junction and create high-quality gateway to Rugby town centre.</p> <p>St Andrews Gardens masterplan</p>	<ul style="list-style-type: none"> Enables an environment that is much greater aligned with this historical location Creates a greater sense of arrival and place for all visitors Reduces the impacts of strategic (non-local) vehicle movement on local access and movement Encourages more local trips by walking, cycling and bus Improves pedestrian and cyclist crossings and access to and from the town centre to neighbouring residential areas Improves bus accessibility, reliability and road safety Helps to meet climate emergency and air quality targets 	<p>Commission a multi-disciplinary consultancy to undertake a study (RIBA Stage 2/3), including placemaking, urban design, transport planning, engineering, modelling, sustainability and consultation experts.</p> <p>It is recommended that high-mast video camera surveys and a wide reaching, comprehensive engagement exercise is undertaken as part of the project.</p>
M2	Convert Evreux Way roundabout to a signalised junction and create high-quality gateway to Rugby town centre	Replace the roundabout with a signalised junction that prioritises pedestrians, cyclists and bus access including wide, one-stage pedestrian and cyclist crossings to improve connectivity to existing and future development and road safety. Create a high quality gateway environment around the junction including development with active frontages, green and blue infrastructure.	N/A		WCC	<p>WCC including transport planning, highways and public realm specialists with support from RBC.</p> <p>It is recommended that RBC play a significant role in project brief development and the commission procurement process as well as being an active stakeholder as part of design decisions.</p>	N/A	High	Long term	<p>M1C: Downgrade Corporation Street to create a street environment for all</p> <p>RC20: Rugby Central Phase 1</p> <p>RC21: Rugby Central Phase 2 (Multi Storey Car Park conversion)</p>	<ul style="list-style-type: none"> Improves visitors' sense of arrival at this important northern town centre entrance point Creates a much more welcoming and enjoyable experience for all visitors to the town centre Improves pedestrian and cyclist access, movement, and road safety on what is a currently a vehicle dominated road environment Enables and support more sustainable development either side of this important route Integrates the town centre with a wider area by sustainable and active travel modes 	<p>Commission a multi-disciplinary consultancy to undertake a study (RIBA Stage 2/3), including placemaking, urban design, transport planning, engineering, modelling, sustainability and consultation experts.</p> <p>It is recommended that high-mast video camera surveys and a comprehensive engagement exercise is undertaken as part of the project. Careful consideration will need to be given to potential future development access arrangements.</p>



Ref	Name	Description	Character Areas	Status	Ownership	Delivery Responsibility	Funding Source	Cost	Timescales	Interdependencies	Outcome(s) / Theme Alignment	Next Steps
M1C	Reimagine Corporation Street to create a street environment for all.	<p>Change the nature of this road from a strategic highway route to a local street environment for people to access and enjoy.</p> <p>Reallocate road space to provide improved footways, greening, bus priority and cycling infrastructure.</p> <p>Improve road safety including junction measures, high quality one-stage pedestrian / cyclist crossings and appropriate cycle infrastructure that link to proposed future development sites.</p> <p>Improve bus stop accessibility and bus reliability.</p> <p>Improve wayfinding and signage.</p> <p>Improve the quality of the public realm including decluttering, footway improvements and tree planting.</p>	N/A		WCC	WCC would lead with RBC as a key stakeholder and active participant as part of design decision process.	N/A	High	Longer term	<p>M2: Convert Evreux Way roundabout to a signalised junction and create high-quality gateway to Rugby town centre.</p> <p>It is important to ensure that this large-scale project is supported by other wider sustainable travel initiatives such as bus improvements and pedestrian and cyclist route schemes to enable the benefits of the scheme including improving traffic flow, bus reliability and air quality to be fully felt.</p>	<ul style="list-style-type: none"> • Enables and supports more sustainable development either side of this important route to come forward • Creates a much more welcoming and enjoyable experience for all visitors to the town centre • Reduces the overreliance on the private vehicle to travel to, from and around Rugby, particularly for short and medium distance journeys • Better integrates the town centre with wider neighbourhoods • Improves bus accessibility and reliability • Improves air quality and fully support the national response to climate emergency 	<p>Commission a multi-disciplinary consultancy to undertake a study (RIBA Stage 2/3), including placemaking, urban design, transport planning, engineering, modelling, sustainability and consultation experts.</p> <p>It is recommended that high-mast video camera surveys and a comprehensive engagement exercise is undertaken as part of the project.</p> <p>Careful consideration will be needed to potential future development access arrangements.</p>



NON-PHYSICAL INTERVENTIONS

- Council-led
- Council Supported
- Council as Statutory Authority

Ref	Name	Description	Action Required	Lead Responsibility	Delivery Partners	Status	Timescales	Critical Dependencies	Theme Alignment
NP1	Place Branding and Marketing	Rugby town centre needs a visual identity for both civic pride and communication purposes. Avison Young to undertake research (including interviews) to establish thematics, proposition and approach to place branding. Avison Young's initial work to culminate in formation of the creative brief ready for issue to creative agencies.	<ul style="list-style-type: none"> • Agree the Creative Brief proposed by Avison Young • Issue Creative tender to selected agencies / via public sector procurement method • Score agency responses • Appoint creative agency • Work with creative agency to launch and roll out creative brand ensuring congruence to original vision and ongoing Regeneration Strategy remains 	RBC	TBC	Continue	Immediate	The brand must interlink to the vision to support it – it cannot go off on a different tangent although the guiding principles will become more succinct and must have a USP.	<ul style="list-style-type: none"> • Future proofing the town centre • Boosting enterprise and innovation • A town centre for all
NP2	Public realm strategy for Rugby town centre	Preparation of a town centre public realm strategy which expands the public realm framework set out in this report. This should cover the following as a minimum: <ul style="list-style-type: none"> • Overall approach to the Public Realm and key principles; • Public Realm Vision; • Public realm illustrative framework • Priority Projects; • Street Typologies; • Key Streetscape Projects; • Open Space Typologies; • Play and Recreation; • Public Realm Guidance; • Approach to planting and public art. 	<p>The public realm analysis and guidance developed for the Town Centre Regeneration Plan forms a foundation for a more detailed Public Realm Strategy.</p> <p>This will assist in defining a co-ordinated approach for key town centre streets, alongside transformational streetscape and public space proposals where these align with adjacent development opportunities across the town centre.</p> <p>RBC to lead the project. It is recommended that the steering group for the project also include WCC officers to ensure a joined up and co-ordinated approach to movement strategy.</p> <p>It would be beneficial to undertake focused stakeholder engagement with key landowners and developers through the process.</p> <p>Commission a consultancy to undertake a public realm strategy. It is recommended that this is led by landscape architects with inputs from movement specialists. There might also be benefit in allowing for some high level Cost Consultancy inputs to shape budgets for key projects in support of subsequent detailed design of spaces and/or funding bids.</p>	RBC	WCC	Continue	Immediate	All movement and public realm projects as identified.	<ul style="list-style-type: none"> • Improved design quality and placemaking outcomes, with benefits to investment and business outcomes • Improves public realm environment and contributes to addressing climate emergency



Ref	Name	Description	Action Required	Lead Responsibility	Delivery Partners	Status	Timescales	Critical Dependencies	Theme Alignment
NP3	Car Parking and Development Enabling Study	Commission an independent development parking enabling study. This study should include car parking surveys including high-mast video surveys, where appropriate to better understand existing parking capacity, demand and issues. The study should include an on-street, off-street and private parking review. The aim of the study should be to identify a phased strategy for relocating, rationalising and removing car parking in line with the proposed Rugby masterplan development framework. The study should also identify measures to improve access, wayfinding, appropriate EV parking and charging points, car club and disabled parking provision, delivery hubs and cycle parking in the short, medium and longer term	<p>Car park usage</p> <ul style="list-style-type: none"> • Building on the parking model that has already been undertaken, compile and analyse available car parking usage information: • Using pre-Covid parking data that informed the masterplan work • Making spot' visits to all town centre car parks to ascertain approximate usage levels to compare with available data - incl. photos/records as appropriate • Expand parking model to include on-street parking (including, where appropriate, parking beat surveys) using same existing / future supply / demand analytical structure <p>Development schedule</p> <ul style="list-style-type: none"> • Prepare a development schedule from the present day through to the life of the masterplan, identifying: • Car park site / building loss / gain • Changing parking demand (pre-pandemic levels as a baseline) • Establish future parking scenarios • Research and establish likely parking demand and supply scenarios in relation to: • Masterplan development schedule incl. parking loss, gains, new development demand • Climate Emergency target achievement • Other policy imperatives • Sustainable transport and other transport infrastructure changes <p>Test future parking scenarios</p> <ul style="list-style-type: none"> • Meet with stakeholders to discuss developed scenarios • Amend / iterate / finalise scenarios including sensitivity tests for future supply and demand change <p>Estimate future town centre parking need</p> <ul style="list-style-type: none"> • Across all relevant town centre car parks • Focus on short / medium term sites • Develop parking demand estimates, i.e. low, med, high for development sites for 3 agreed future years • Report Recommendations • Development phasing and parking considerations (car-lite / free principles) • Traffic management, parking access and wayfinding measures • EV charging and parking locations, delivery and servicing and disabled parking measures • Active travel and public transport measures. 	RBC	Recommend commissioning an independent study that is led by RBC including Regeneration, Transport Planning, Parking and Public Realm. WCC and private car park owners would be key stakeholders.	Explore	Immediate	N/A	<ul style="list-style-type: none"> • Unlocks sustainable development and growth • Reduces the impacts of vehicles on the local streets • Better supports local business operations • Helps meet climate emergency and air quality targets • Maximises town centre assets



Ref	Name	Description	Action Required	Lead Responsibility	Delivery Partners	Status	Timescales	Critical Dependencies	Theme Alignment
NP4	Bus Strategy and Framework for Change	Commission a review of the existing bus situation in Rugby. Working with WCC, bus operators and other key stakeholders to identify issues and opportunities to improve station / bus interchange, town centre bus stops, existing and potential future bus routes and service improvements.	<ul style="list-style-type: none"> Identify issues and opportunities for change Develop a phased spatial masterplan and supporting strategy for change Liaise with bus operators and other key stakeholders including taxis and Network rail 	WCC	WCC with active involvement by RBC	Explore	Medium term	N/A	<ul style="list-style-type: none"> Enables a fully accessible, affordable, well connected, reliable, and sustainable bus system Better connects Rugby, its existing and future hinterlands with sustainable travel including proposed significant growth areas Reduce the overreliance on the private vehicle to travel to, from and around Rugby, particularly for short and medium distance journeys Reduce poverty and improve health and well-being, particularly for those who are reliant on public transport to get to and from work and education Improve air quality and fully support the national response to climate emergency
NP6	Development Planning	Recommend a movement towards 'car free' or 'car-lite' development to meet environmental targets.	<ul style="list-style-type: none"> Review existing planning policy. Building on the principles and approach of the masterplan framework, as well as the outcomes of the parking enabling study, introduce a sustainable and active travel strategy that promotes this type of development as part of future planning policy. 	RBC	RBC with support from WCC	Explore	Medium term	NP3: Car parking study	<ul style="list-style-type: none"> Future proofing the town centre A town centre for all Enables positive diversification
NP5	Public transport and active travel branding	Improve public transport branding and marketing including transport information online and on-street.	<ul style="list-style-type: none"> Undertake an audit of existing on-street and on-line transport information Work with WCC to develop a brand for active and sustainable travel in Rugby Update online information and where feasible create an integrated mobility as a service app for the area Improve wayfinding and signage on street for all modes 	RBC	WCC with active involvement by RBC	Explore	Medium /longer term	N/A	<ul style="list-style-type: none"> Creates a 21st century mobility as a service (Maas) experience for people Reduces poverty and improves health and wellbeing through greater access and more transport choices
NP6	Meanwhile Use	Devise a meanwhile strategy to run throughout the Framework implementation period that allows the council to make immediate interventions and test consumer demand. Whilst the longer term interventions are in progress, there are actions that can be taken to enliven and improve the town centre in the short term. This will include a mixture of event activity and cosmetic/quick fix installations and pop up activity either within the public realm or other designated spaces (e.g. an empty retail unit). The strategy needs to be agreed and funded with funding for both the meanwhile intervention and any associated marketing to allow it to be promoted.	<ul style="list-style-type: none"> Appraise options for Meanwhile Use provided by Avison Young Develop Meanwhile Use budget/identify funding and schedule timing plan Agree responsibility lead for meanwhile activations Agree marketing communications plan for meanwhile Oversee implementation of meanwhile use ensuring congruence to original vision and ongoing Regeneration Strategy remains Monitor success and evaluate to inform future strategy 	RBC	TBC	Explore	Immediate	NP3: Car Parking Study All Council-led development sites should be considered in the first instance.	<ul style="list-style-type: none"> Future proofing the town centre Boosting enterprise and innovation A town centre for all

Focus on key areas of change

4.104 This chapter distils guidance for the eight main town centre character areas. Spatial guidance is set out for each character area, alongside an overview of current site conditions, land uses, massing and townscape considerations, an overview of potential development capacity and phasing / delivery considerations.

4.105 The character areas are listed below as follows:

- Corporation Street West;
- Rugby Central;
- Town Hall;
- Webb Ellis Industrial Estate;
- High Street;
- Old Town;
- Old Market; and
- Station Gateway.

4.106 Rounds Gardens is also identified as a character area (see chapter 3, strategic projects for further information), and the project is being progressed in parallel with the town centre Regeneration Strategy.

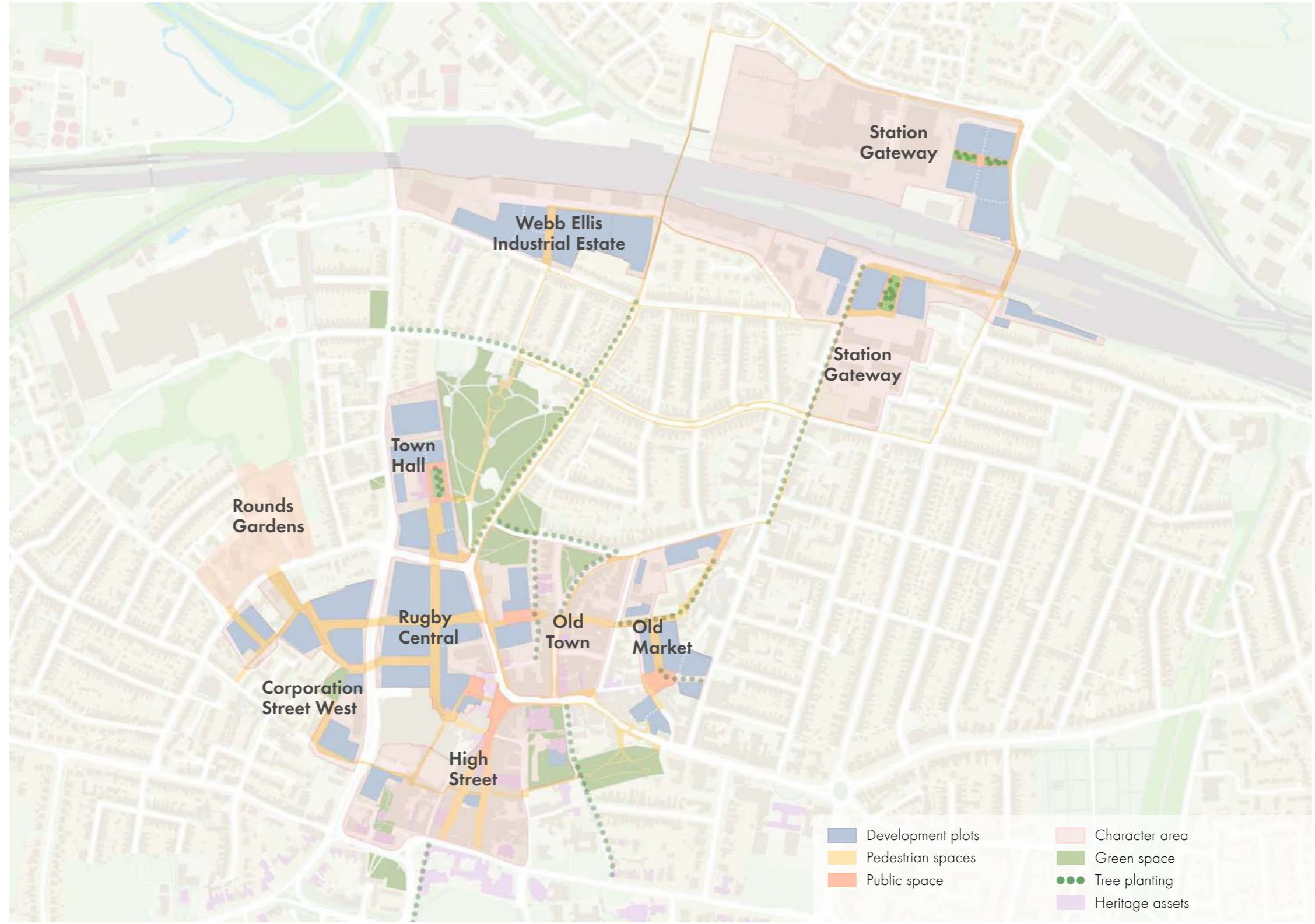


Fig 33 Character area summary plan



CORPORATION STREET WEST

The opportunity

- 4.107 The long-term development and investment potential within the Corporation Street West character area is intrinsically linked with the delivery of a number of key adjacent projects, and ability to catalyse comprehensive change within the area.
- 4.108 With the delivery of a new high quality residential offer at Rounds Gardens, the importance of Corporation Street West as a ‘connecting’ area between new residents and the core of the town centre is heightened.
- 4.109 The long-term ambitions for Rugby Central, with the potential for the comprehensive redevelopment of the multi-storey car park (MSCP) and associated opportunity to change the nature of Corporation Street from a highway-dominated environment to a street where walking, cycling and public transport is prioritised.
- 4.110 This wider context creates significant opportunity to create a new urban residential community at Corporation Street West, with strong connections through to Rounds Gardens and Rugby Central – recognising the key role for this area as providing east-west routes through to the core area.
- 4.111 The residential offer within this location should reflect the urban location of the character area. Market analysis supports the potential to deliver family housing alongside apartments, but in a dense urban form – i.e. delivery of townhouses as well as apartments.
- 4.112 This housing offer should be supported primarily by retail amenity offer within the core of the town centre. Delivery of green infrastructure within the neighbourhood is considered important to support the community and create a high quality residential environment – improving walking and cycling routes to the town centre core.

The area today

- 4.113 Corporation Street West is located between residential neighbourhoods to the west and the rest of the town centre to the east. The current nearby housing offer is relatively low rise, and a homogenous series of terraced homes and flats. The residential stock tends to be inwards facing, with very little public realm and open space for residents to interact, and to the south is largely owned by the Council.
- 4.114 Driven by its edge of centre context and connectivity, the area is typified by a mix of low density commercial (big box retail and Morgan Sindall’s offices) and public services uses e.g. the Fire Station and Health Centre. This is mainly located on the eastern edge to benefit from good access onto Corporation Street West. Whilst this acts as a ‘buffer’ for the residential, it creates severance between the residents and the town centre. There are few opportunities to cross and cycle safely which supports the rationale to consider redesigning the road network to improve resident accessibility and shift towards more active modes of transport including walking and cycling.
- 4.115 In a similar vein, a negative impact to the current built environment is the combined presence of Corporation Street and the blank façade of Rugby Central MSCP. This creates a stark and unanimated “corridor” that again, cuts residents off from the core town centre. The redevelopment of the car park, public realm and traffic management improvements could help to ‘open up’ the area and provide a more pleasant and permeable environment, supporting the ability to deliver more attractive, higher density housing facing Corporation Street.
- 4.116 At the heart of character area is Westway Car Park, which sits along an existing pedestrian route through the site and is generally underutilised. The future redevelopment potential of the car park is linked to wider

Council strategy on release – but its development potential in isolation is noted to be relatively limited.

Development and Design Strategy

- 4.117 The change envisaged within Corporation Street West is both long term and comprehensive, and as such requires a strong vision and a pro-active delivery strategy.
- 4.118 It is clearly recognised that the ambition and opportunity in this area is intrinsically linked to wider delivery, and therefore a changing context. This, and the scale of change potential identified, creates the opportunity to set a new tone in development form, style and scale in an area currently disjointed and lacking in any real sense of place.
- 4.119 Future development should mediate and facilitate the transition from the town centre core to the neighbourhoods to the west by concentrating height along Corporation Street, which is intended to be re-designed.
- 4.120 Proposals should be aligned with the long term change strategy for Rugby Central, and by locating lower-density development, such as terraces, along Oliver Street.
- 4.121 Proposals should ensure that development fronts key routes, creating a positive address to Corporation Street, alongside positive creation of key east-west routes through this area.
- 4.122 The development opportunities should be focused on providing a variety of dwelling types (including both flatted and family homes, as well as Extra Care) that form part of a new residential neighbourhood located along a series of defined and connected streets and routes. Non-residential uses along Corporation Street may be appropriate to serve new residents and provide active frontage to the downgraded street, but the bulk of amenity should be within the town centre – encouraging this footfall and interdependency between the two areas.



Westway Car Park



Schoolfield Grove



Rugby Fire Station and Corporation Street

CORPORATION STREET WEST

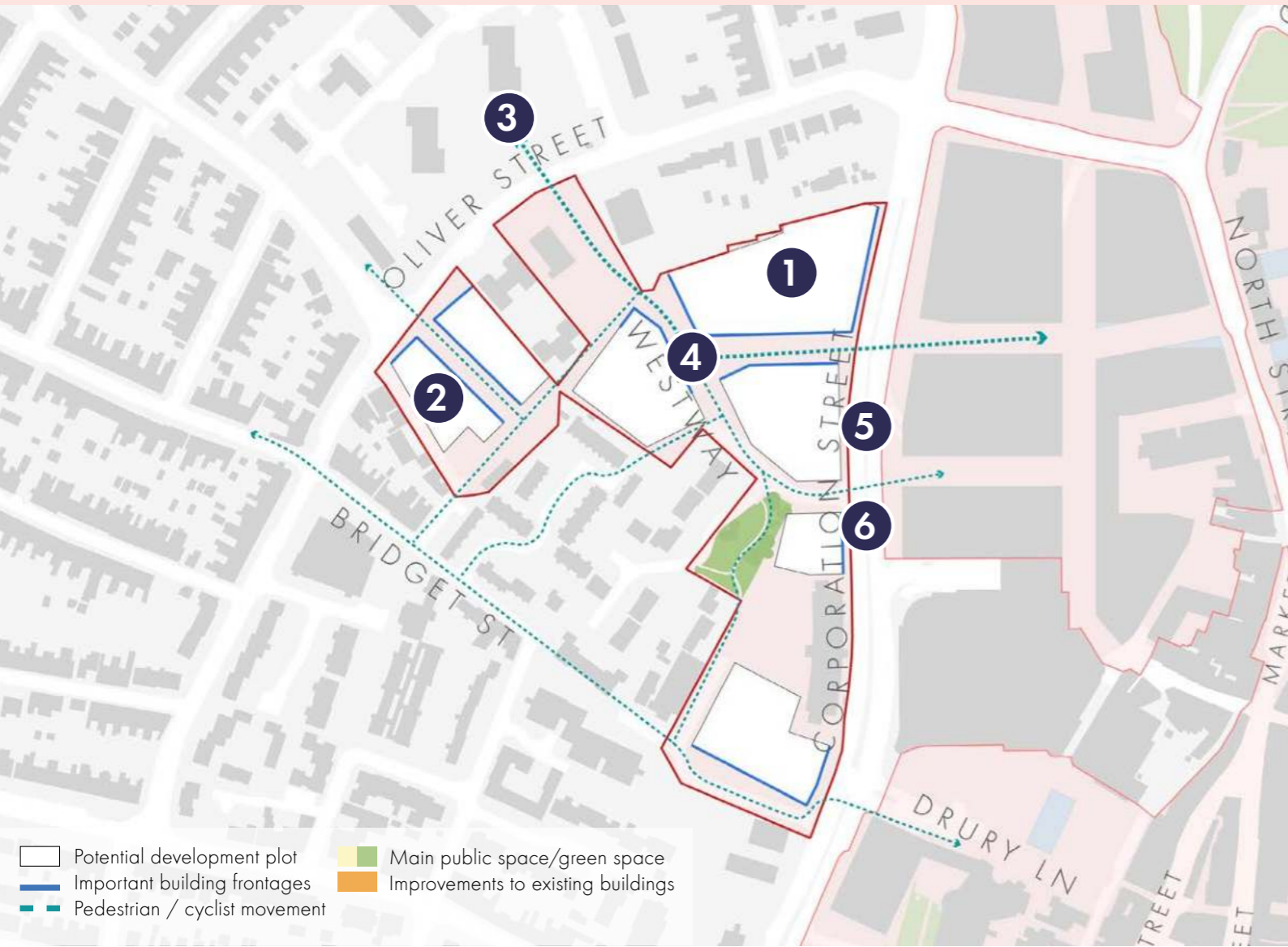


Fig 34 Corporation Street West Framework plan (numbers relate to key points on page 121)

Key points

1. Creation of a new residential development – to include high density and family housing.
2. Delivery will require comprehensive approach and potential need for strategic land assembly.
3. Important alignment between comprehensive development potential of the area and delivery of Rounds Gardens regeneration, long term implementation of Rugby Central and the vision for Corporation Street as a movement corridor.
4. Potential to deliver new and improved and new connections between Westway and Bridget Street.
5. Important development frontage to Corporation Street.
6. Critical to deliver alongside improvements to Corporation Street including more crossings, cycle infrastructure and greening, with new buildings creating a positive ‘front door’ for development.

Storeys	2-6
Potential land uses	Residential
Approx. GEA (new and refurbished)	36,000m ²
Dwellings	330

Fig 35 Summary of indicative development approach

Movement and Public Realm

4.123 The key movement and public realm interventions include:

- The re-design of Corporation Street from highly trafficked, engineered road to a street environment that prioritises safe and convenient walking, cycling and public transport access and movement.
- The introduction of additional east-west pedestrian and cyclist crossings on Corporation Street that link existing and future neighbourhoods to the west with the town centre
- Improving lighting, introducing street trees, greening and bespoke public realm interventions along the corridor, as well as interlinked routes to create a welcoming environment for all

Phasing and delivery

4.124 The redevelopment of Corporation Street West will be achieved over a long-term time frame. Its full potential is linked to the delivery of two catalyst projects, Rugby Central and Rounds Gardens, and the future investment in Corporation Street itself.

4.125 The Council owns some land within the area – the Westway Car surface level car park – but its development potential in isolation is considered to be relatively limited. It will be important to create critical mass of development potential in this area to attract private sector investment.

4.126 There is an opportunity to engage directly with the Fire Service and NHS / CCG regarding the fire station and health centre within the area. Given the public sector nature of these assets, these are considered important opportunities for land assembly within the area.

4.127 More widely, engagement is required with the Third Party owners of the commercial space within the area – understanding

Morgan Sindall’s property future property requirements could present opportunities for the Council to include them in the Rugby Hub delivery strategy – with the potential to deliver commercial as well as public sector office space.

4.128 The structural changes in the retail market may result in a change to occupation strategy for the big box units. In both cases, the Council needs to be alive to the potential to manage change through land assembly in this area to create critical mass and a coherent and comprehensive long term development proposition – rather than incremental change which will not deliver the full vision for this area.

SHORT-TERM

- Progress delivery at Rounds Gardens, and finalise strategy for Rugby Central (Phase 2) and Corporation Street West
- ‘Hold’ Westway Car Park as a longer-term development opportunity – with marriage value associated with assembly of land across the wider area to create critical mass
- Public sector land assembly to enable long term comprehensive change

LONG-TERM

- Delivery of Rugby Central (Phase 2) and Corporation Street improvements
- Procurement of development partner for Corporation Street West
- Commencement of comprehensive redevelopment of the area to create a new high quality, mixed residential neighbourhood
- Delivery of east-west connectivity and new high quality, safe, accessible and active routes to the core of the town centre



The opportunity

- 4.129 Rugby Central is identified within the Regeneration Strategy as a catalytic development and investment project. If considered comprehensively – including not just the implementation of the Phase 1 proposals for Rugby Central Shopping Centre – this character area can address a number of structural issues identified within the Regeneration Strategy and become a key attractor of footfall, vibrancy and investment.
- 4.130 When delivered, Rugby Central will be a modern, well-connected, high quality town centre anchor. The opportunity to address structural challenges includes addressing traditional high street retail oversupply in the town centre through the delivery of a more diverse retail proposition, delivery of residential development within the core of the town centre, and ‘exploding’ the internalised nature of the current shopping centre thereby facilitating improved east-west connectivity and greater permeability in general across the area.
- 4.131 The focus for Rugby Central will be to deliver a greater experiential and more diverse commercial offering. It has the ability to provide exciting, animated ground floors alongside new residential development, including greater food and drink, and leisure uses which could provide a much-needed night-time offer to attract in and serve visitors and the local community.
- 4.132 The full potential of this character requires delivery beyond the current Phase 1 proposals and will need to address challenging issues including the existing multi-storey car park to Corporation Street, and the further private interests to the north – including the recently acquired former Cemex office building.
- 4.133 The scale of change that can be delivered at Rugby Central in its fullest sense will leverage material investment and development opportunity in key adjacent locations. A

comprehensive approach to the shopping centre and multi-storey car park will include changes to Corporation Street – with links across to the Corporation Street West character area. To the east, the project highlights the importance of integration of improvements to North Street, and in turn therefore directly aligns with the development potential at the North Street Car Park within the Old Town character area.

The area today

- 4.134 The Rugby Central character area is dominated by the existing Rugby Central Shopping Centre, an internalised shopping centre, and its associated multi-storey car park. In the northern part of the character area is the existing 10-storey former Cemex office building, its associated surface level car park and the recent McDonalds drive-through development. To its North Street frontage there are a number of individually owned retail interests – including pubs and shops.
- 4.135 The character area is bounded by Corporation Street, Evreux Way, and North Street. To the south the area connects into Rugby Market and the Sheep Street / High Street character through the shopping centre itself via a covered retail parade.
- 4.136 The site itself is quite ‘monolithic’ and closed off, with a large, aggressive, blank façade facing Corporation Street. Permeability is currently poor, with limited east-west connectivity and movement facilitated into the shopping centre from the west in particular. As a result, the western façade of the centre and Corporation Street are noted to be material barriers to at grade connections into the core of the town centre.
- 4.137 Whilst the shopping centre generates footfall and visitors to the centre, the internalised nature of the centre and its relatively poor permeability undermine the facilitation of linked trips. The character of the shopping

centre is directly at odds with the character of the wider town centre – which has a huge amount of heritage including within building architecture and Caldecott Park.

Development and Design Strategy

- 4.138 Rugby Central has an important role to play within the commercial offering of Rugby town centre in the future.
- 4.139 The Phase 1 delivery proposals, currently the subject of a planning application, include the assumed redevelopment of a significant area of the existing covered shopping centre between Corporation Street and North Street, to create new ground floor active retail space with apartment-led residential development on upper floors.
- 4.140 The Regeneration Strategy considers the activation of this ground floor space to be a key opportunity to create new animation and attract a broader offer into the town centre in the future – including new and enhanced food and drink, leisure and cultural offering. The introduction of a residential offer into the heart of the town centre will increase footfall and 24-hour surveillance and vibrancy, which is much needed within the core of the area.
- 4.141 However, delivery must progress beyond Phase 1 to ensure that the full potential of this character area is realised. At the heart of future phases is the need to think outwardly about the development potential to the west and north in particular.
- 4.142 Key development locations in that context are the existing multi-storey car park in the west, and the third-party ownerships in the north – with particular focus on the former Cemex office building and associated car park which is the subject of a live application for redevelopment for the purposes of a food store at the time of writing. Careful consideration will need to be given to utilities constraints in this location.



Rugby Central Market Place entrance

- 4.143 Both development areas have key interfaces and interferences with infrastructure delivery projects. The Regeneration Strategy is clear in its ambitions to deliver a signalised junction at Evreux Way which will potentially include land release and opportunity to create prominent and high-quality development and public realm as a key gateway to the centre from the north at the former Cemex site. The redevelopment of the multi-storey car park has direct interface with the potential to completely change the character of the western approach to the town centre core with active frontage onto Corporation Street West.
- 4.144 Longer term land use in this context, including and beyond Phase 1 implementation should include, subject to viability and occupier demand, hotel, office, cultural, retail (noting focus on diversification away from high street retailing to have a focus more on food and drink and leisure uses, to complement the Old Town and Sheep Street / High Street areas) and residential.
- 4.145 Future development generally across Rugby Central should be of varied mid-rise character, with buildings up to around 5-6 storeys. Development should respond sensitively and respect the heritage assets to the south-east corner – preserving Rugby’s unique sense of identity.

RUGBY CENTRAL

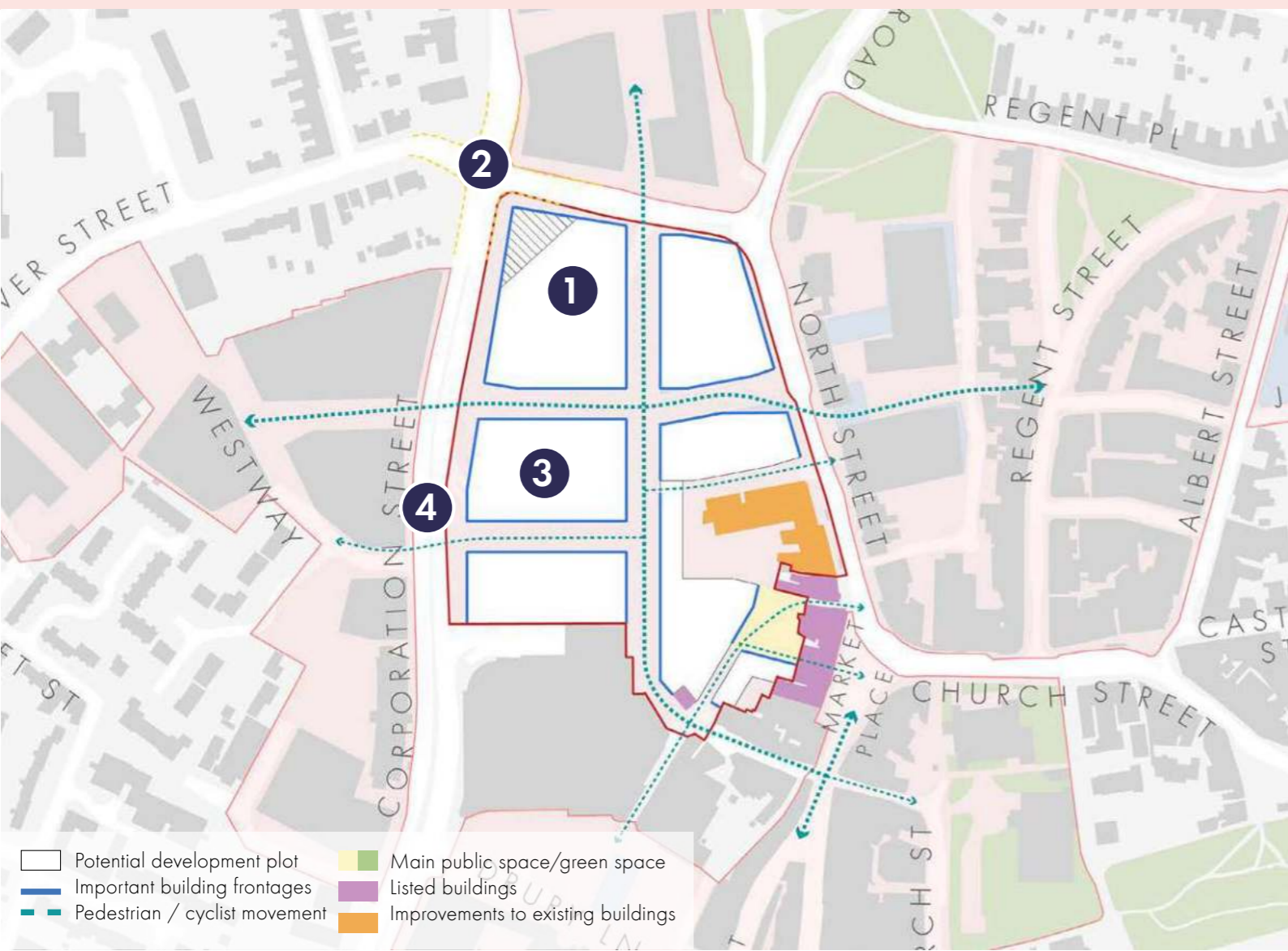


Fig 37 Rugby Central Framework plan (numbers relate to key points on page 125)

4.146 The massing should reflect the prominence of the north-western corner and improve the relationship currently between the Cemex building and its surrounding uses. Revised, it will front onto an improved junction on the site of the Corporation Street roundabout.

4.147 A range of town centre uses might be acceptable on the Cemex site. Regardless of use, it is key that this part of the site creates an attractive, active frontage to Corporation Street, Evreux Way and east-west linkages to Corporation Street West and the northern end of Rugby Central. Proposals should incorporate high quality public realm and streetscene, and support connectivity for pedestrians. Proposals should avoid the creation of sterile spaces, blank frontages and large impermeable development blocks.

4.148 The redevelopment of the multi-storey car park presents an opportunity to create a more attractive frontage to Corporation Street.

Storeys	4-6
Potential land uses	Residential, hospitality, retail/ food and beverage / leisure
Approx. GEA (new and refurbished)	73,000m²
Dwellings	520

Fig 38 Summary of indicative development approach

Key points

1. Need to deliver comprehensive and coherent change across multiple private ownerships to address existing structural issues and create a network of attractive and vibrant streets and spaces to create much stronger east-west and north-south routes and as the basis to attract occupiers.
2. Aspiration to replace Evreux Way / Corporation Street roundabout with a signalised junction with associated opportunity for land release and creation of stronger active frontage on former Cemex site as a key gateway location – either in the form of activated development frontage or high-quality public realm subject to utilities constraints.
3. Decisions relating to Rugby Central multi-storey car park are intrinsically linked to the need for a wider development-enabling car parking strategy for the town centre. Release of this asset will likely require establishing where inceptor car parks could be located in the future and will follow commercial confidence through Phase 1 implementation.
4. Redevelopment of the multi-storey car park is a key consideration alongside the ambitions to transform Corporation Street to create a greener, more people friendly connection with new buildings fronting onto the street on both its eastern and western edges.

Movement and Public Realm

4.149 The key movement and public realm interventions include:

- The re-design of Evreux Way including, where possible, the replacement of the Evreux Way roundabout with a signalised crossing, which is supported by excellent public realm and green infrastructure to create a high-quality northern town centre gateway for visitors
- Ensuring new east-west and north-south links are fully integrated as part of the redevelopment of Rugby Central including linking Corporation Street West character area with Rugby Central, North Street and Caldecott Park via Evreux Way. These new streets should prioritise walking, cycling and include bespoke public spaces, greening and quality lighting
- Delivering high-quality public realm on North Street that integrates Rugby Central with the streets and spaces to the west. The scheme should include modernised and streamlined bus stop arrangements, greening, shop spill out areas and places to rest
- Development that is founded on car-free or car-lite principles and supported by high quality walking, cycling, micro-mobility, bus and taxi infrastructure.

RUGBY CENTRAL

Phasing and delivery

4.150 Delivery of the full ambition at Rugby Central requires a strong interface between two private landowners – the owners of Rugby Central Shopping Centre and the owners of the former Cemex offices and associated car parking. It is important that regard is had between these two future development locations to ensure proposals are supported by a coherent approach to interface between the connecting sites – from a design, movement, public realm and management perspective. This area of the town centre currently creates significant severance, and any future redevelopment must ensure similar circumstances are not created in the future.

4.151 Whilst the Council has some ownership within the area – associated with the multi-storey car park (noting this is not full or majority ownership of the asset), its primarily initial role is to facilitate the relationship between the landowners in this area. Given the strategic importance of this development project, the Council is prepared to use its statutory powers in the form of CPO powers if necessary to enable delivery.

4.152 As a full development proposition, Rugby Central is a long-term aspiration – however, this long term nature relates to the completion of the project rather than its commencement. Delivery of Phase 1 of the Rugby Central project is a priority given its assumed impact on the wider area, and ability to directly inform future phases of delivery in the area.

4.153 The restructuring and diversification of the retail offer in the town centre will be important to create market confidence, additional footfall through the delivery of new space and offer alongside residential development will drive greater investment in the wider town centre, and the commencement of this project will be a significant statement to the wider development

and investor market. It will also be an important milestone and positive sign of intent for the local community.

SHORT-TERM

- Support commencement of Phase 1 of Rugby Central critical to create momentum and drive wider investment across the town centre.
- Engagement with private sector asset owners including collective dialogue to agree delivery principles on a site-wide basis to protect long term interests across the area, including acknowledgement, support for and recognition of interface with strategic infrastructure projects at North Street, Evreux Way and Corporation Street.
- Finalisation of a town centre car parking and development enabling strategy to inform the case for and timing of potential redevelopment of the Rugby Central multi-storey car park.
- Progression of funding applications (on an opportunity basis, i.e. aligned to available funding programmes at any one time), to ensure delivery of this project as a key catalyst for wider change.

LONG-TERM

- Potential use of CPO powers to enable long-term comprehensive delivery.
- Closure of multi-storey car park to enable full redevelopment of the area.
- Completion of delivery of significant infrastructure projects at Evreux Way, North Street and Corporation Street – materially and positively influencing movement to and through the town centre, with pedestrians, cyclist and public transport as priority.



Fig 39 Plan illustrating the indicative approach to Rugby Central and Corporation Street West in context - the transformation of Corporation Street and North Street alongside the redevelopment of the centre itself will create strong east-west and north-south connections to adjacent destinations in the town centre



TOWN HALL

The opportunity

- 4.154 The scale of the opportunity to deliver development as investment within the Town Hall character area is exciting and generally speaking is within Rugby Council's gift to determine – as both landowner and occupier.
- 4.155 The potential for comprehensive redevelopment of this character area is intrinsically linked to decision-making around the Rugby Hub project, with an option being explored which considers at least partial retention of the Council's offices and Benn Hall on the site.
- 4.156 This character area is important as a gateway location to the town centre core from the north. Even if the Council's offices and Benn Hall are retained on the site, the Regeneration Strategy notes the potential to release surface level car parking for development purposes, and the opportunity to improve frontage to the new Evreux Way junction.
- 4.157 When considered in combination with the redevelopment of the former Cemex office building, the potential scale of change in this area is notable and needs to set the tone as the visible arrival point to the town centre.
- 4.158 Any development proposition brought forward needs to improve key routes from the station, across Caldecott Park and through into the heart of the town centre.

The area today

- 4.159 The Town Hall site is bounded by Newbold Road and Evreux Way and backs onto Caldecott Park. It contains considerable greenery and accommodates the Listed Retreat building as well as several sites in public sector ownership: the Newbold Car Park (Council owned), the Town Hall (Council owned), the Benn Hall (Council owned), and Warwickshire Police Station (Warwickshire Constabulary owned).

- 4.160 The Town Hall character area is currently underutilised as a site. Rugby Council's current offices are identified to be too large for their current occupation requirements in terms of floorspace. The building layout and configuration is additionally outdated and inefficient.
- 4.161 The Council is currently investigating alternative sites and locations across the town centre to meet its own requirements. As part of this exercise the Council are exploring the potential to co-locate with public sector partners. This project is known as Rugby Hub and is identified within the Regeneration Strategy as a catalyst project.
- 4.162 The Benn Hall is the only multi-use leisure venue within the town centre, that can accommodate large crowds. It currently hosts a variety of events and is used by the community, but it does not meet the needs of a modern Rugby town centre.
- 4.163 The asset as it stands does not deliver a "best in class", entertainment venue. It additionally sits in isolation compared to the rest of the town centre uses, including the current food and beverage offer. If relocated, there is a real opportunity to deliver a better integrated venue that work symbiotically with the new retail, food and beverage and leisure offering proposed in Rugby Central and within the High Street / Sheep Street area of the town centre.
- 4.164 At present, there is no permeability across the site to Caldecott Park and the existing buildings produce an inconsistent street frontage dominated by car parking.

Development and Design Strategy

- 4.165 The development strategy for the Town Hall character area can only be determined when there is resolution on the Rugby Hub project. There is identified development potential on the surface level car parking across the site, but its release can only really be considered when the future of the adjacent sites can be factored in or out – to determine best development mix, best value, and best strategy to implement.

- 4.166 The Regeneration Strategy recognises a number of scenarios that could be realised within this character area as a result, these include:
 - Retention of Town Hall, Benn Hall, listed buildings, and Police Station. Release of surface level car parking for development purposes.
 - Release of Town Hall, Benn Hall, Police Station and car parking for development purposes. Retention of listed buildings.
 - Release of Town Hall, Benn Hall and car parking for development purposes. Retention of listed buildings and Police Station.
 - Release of Town Hall, Police Station and car parking for development purposes, Retention of listed buildings and Benn Hall.
- 4.167 Notwithstanding the above uncertainty, the Regeneration Strategy has profiled the most likely and acceptably uses anticipated to be accommodated through any redevelopment in the area. The Regeneration Strategy considered that a mixed use approach to the site is more acceptable, and therefore assumes a combination of the uses identified below:
 - Delivery of a new Rugby Hub building alongside other uses.
 - Delivery of a new inceptor car park, if identified to be the optimal location to do so within the car parking and enabling development strategy. An inceptor car park could be considered important to unlocking other development sites across the town centre. It is an important intervention that could come forward in the longer term to move Rugby forward in terms of its ability reduce its reliance on driving into the town centre and consider sustainable alternative modes of transport.
 - Delivery of a mix of new homes to include family housing alongside apartments. With the park setting and additional public realm, this could be a new 'pocket' neighbourhood that is well connected into the town centre core with a historical setting. This housing offer should be supported primarily by a retail amenity offer within the core of the town centre.



Rugby Borough Council offices



The Retreat seen from Caldecott Park

- Delivery of a new hotel to address an identified gap in the market. This should differentiate from the current budget hotel offering and be an attractive proposition to draw greater tourists crowds to the new revitalised town centre.
- 4.168 There is an opportunity to consider a stepped development across the site. Buildings adjacent to the Listed Retreat building should be sensitively designed in order to enhance its setting and support the creation of a set of high quality adjacent routes and spaces.
- 4.169 Buildings by Evreux Way should achieve more height, up to around 5-6 storeys, to provide a positive frontage to the improved Corporation Street roundabout and the Rugby Central development to the south.



TOWN HALL



Fig 40 Town Hall Framework plan (numbers relate to key points on page 131)

4.170 If an interceptor car park is delivered in this location, it will be important for the car park to be future-proofed to allow re-use and adaptation by embedding suitable floor to ceiling heights and access points.

4.171 New family homes in low and mid-rise apartment buildings on this site would benefit from proximity to retail core of the town centre and the adjacent amenity at Caldecott Park. Ground floors on plots adjacent to Rugby Central could accommodate retail amenity uses (that are aimed towards supporting the new residents, rather than competing with provision cross the road).

4.172 Various uses could be accommodated in the south-eastern plot, such as hospitality or the consolidation of public sector office space in a Rugby Hub. This will need to be configured to make the most of the park setting and new green routes.

Storeys	3-6
Potential land uses	Residential, retail/food and beverage / leisure, MSCP
Approx. GEA (new and refurbished)	49,000m²
Dwellings	210

Fig 41 Summary of indicative development approach

Key points

1. The Regeneration Strategy has not been able to determine the preferred approach to the Town Hall character area given the uncertainty around the Rugby Hub project at the time of writing. The development potential in this location is considered to be maximised through the relocation of the Council and Benn Hall from the site – but the Regeneration Strategy recognises that this must be considered in the round, including whether such a strategy is commercially viable and deliverable for the Council.
2. Any future development on the site needs to ensure delivery of quality connections to Rugby Central and Caldecott Park, improvements to Evreux Way to make it more “people-friendly,” and ensure it is integrated with the wider areas of change.
3. It is important to deliver replacement of the roundabout at Evreux Way with a signalised junction to improve the arrival experience, to create additional land for development, high-quality public realm, to establish a safer environment for pedestrians and cyclists. Any future on-site development needs to be designed and delivered to respond positively to this – and may need to contribute to its delivery.
4. Potential land uses that could be accommodated in the area include residential and commercial activities including hotel, leisure and culture, the potential to deliver interceptor car parking which may be decked or multi-storey, to support release of parking in other locations for redevelopment, and the need to deliver new open space to enhance the setting of the Retreat adjacent to Caldecott Park.

Movement and Public Realm

4.173 The key movement and public realm interventions include:

- This could be a potential location for an interceptor car park with integrated bus stops, cycle stands / hire and electric charging hub. The scale, nature (temporary or permanent) and timescales for introducing a multi-storey car park in this location will depend on the scale and timing of redevelopment of car parks within the town centre including Rugby Central, John Barford and surface car parks such as North Street. This would need to be determined as part of a development enabling parking strategy review as recommended in the delivery plan.
- Improving the relationship between the site, the town centre, Caldecott Park and the wider area through the replacement of Evreux Way roundabout with a signalised junction and re-designing Evreux way from a highway-led layout to a street for people.

Phasing and delivery

4.174 The phasing and delivery strategy for the Town Hall character area can only be determined once a resolution is reached on the Rugby Hub project. However, given the Council’s ownership of the majority of the site and the likely interface of the police with the Rugby Hub project, under any scenario it is considered realistic to assume it has medium term development potential.

4.175 If the Council determines that they will remain within the Town Hall, early release of surface level car parking could be considered in this location. However, this needs to be linked to the wider car parking and development enabling strategy, and may need to be the site (at least temporarily) for an interceptor car park, to release wider development in the longer term.



TOWN HALL

4.176 Therefore, the decisions around Rugby Hub and the impending car parking and development enabling strategy are important considerations in the short (immediate) term.

4.177 Rugby Hub is a catalyst project and even if it's partially retained on site, it could bring positive benefits to the character area.

4.178 Direct engagement with the occupiers and relevant council teams will be required to support the relocation of the Benn Hall and the Warwickshire Police station.

SHORT-TERM

- Finalise Rugby Hub strategy and partner engagement to enable decision making, with cascade impacts on the Regeneration Strategy
- Engage with the occupiers and relevant council teams for the Benn Hall, to determine relocation potential and alternative sites across the town centre.
- Complete the Car Parking and Development Enabling Strategy to determine which sites are released if an interceptor car park is delivered. Through this, finalise capacity requirements for the interceptor car park and determine whether the Town Hall is the optimum / required location for its deliver
- Engage with hotel operators to determine demand to deliver scheme in the area (subject to land availability associated with previous bullet points).

LONG-TERM

- Actions will be determined by Rugby Hub decisions and implications for land available for development purposes.



Fig 42 Plan illustrating the indicative approach to the Town Hall site in context - the site has potential for a range of uses, which will benefit from adjacent improvements to Evreux Way and Rugby Central. Linkages to Caldecott Park and enhancement of the setting of The Retreat are key



The opportunity

- 4.179 The Regeneration Strategy aspires to bring High Street and Sheep Street back to their vibrant best.
- 4.180 Once the bustling heart of the town centre, these streets now lack commercial character or coherence – which undermines their inherent and evident architectural value and heritage.
- 4.181 The historic character of the area will be conserved and enhanced with targeted investment. Proposals will strengthen the environment for businesses and traders, improve connections and introduce new uses to complement the high street offer.
- 4.182 The focus in this area will be on making best use of the buildings and assets already in place – rather than being predicated on significant redevelopment. The strategy must bring this area back to life, to avoid the risk of losing the architectural character and history of these streets for future generations.
- 4.183 At the two ends of the character area – the ambition includes breathing new life and purpose to both Rugby Market and RAGM as anchors and future significant footfall drivers.

The area today

- 4.184 The High Street and Sheep Street area is the historic core of Rugby town centre. Its street pattern dates back to medieval times and the area includes a number of listed buildings and was the original home of the Town Hall (now converted for retail use).
- 4.185 The architecture of this area, at upper ground levels, shows Georgian, Edwardian and Victorian character in the main. Significant modification has taken place at ground floor level to accommodate retail uses. The area also includes the Clock Tower which was constructed in 1887 to commemorate Queen Victoria's Jubilee. It occupies the site of the medieval market cross that was removed in the seventeenth century.

- 4.186 The heritage of this area is enshrined in policy terms within the designations of the Rugby town centre Conservation Area planning policy.
- 4.187 Whilst once a bustling high street, vacancies are now more evident on these streets – that are now pedestrianised in nature. Whilst some high street names remain, the area has seen an influx of new uses including local leisure operators, some independent cafés and restaurants, and some retail activities including for example vape shops.
- 4.188 At its northern end this character area is the home of Rugby Market – outside the southern entrance of the Rugby Central Shopping Centre. At its southern end, the currently underutilised RAGM is located, adjacent to the ASDA surface level car parking – which directly impacts on the setting of RAGM as a visitor and cultural offer (and Council-owned asset) within the town centre.
- 4.189 Immediately to the east of the pedestrianised streets is important amenity provision in the form of the Church Park and Holy Trinity Graveyard, with the adjacent former Herbert Gray College as a noted investment opportunity.

Development and Design Strategy

- 4.190 In the future, High Street and Sheep Street should be supported to retain its traditional retail and food and beverage offer, but this should be accompanied by the introduction of workspace to increase daytime footfall.
- 4.191 Given the wider structural challenges within the retail market, it is recognised that the retail offer in this location is likely to evolve over time – with an assumed continue (at least partial) contraction of high street retailers and need to attract more independent traders to this area of the town centre.
- 4.192 Subject to the future of Benn Hall and therefore RAGM, and whether more office occupiers can be encouraged in this area of the town centre this independent retail offer could include the expansion of the embryonic

food and drink offer emerging on these streets currently.

- 4.193 The potential redevelopment of Benn Hall creates specific opportunities including the opportunity to explore accommodating some activities from this important cultural hub which would diversify the footfall and create vibrancy in the pedestrianised streets in the event which in turn could create opportunity for further diversification of the commercial offer.
- 4.194 This character area may be an ideal location for Council relocation as part of the Rugby Hub if pursued on a multi-building basis but more general co-working or accelerator space to support Small and Medium Enterprises (SMEs) should also be considered in line with the Regeneration Strategy land use strategy.
- 4.195 The same is true of future decision making around the integration of health provision within the Rugby Hub – and the opportunity to explore 'shop frontages' for elements of this in the future. This could support the release of land in other opportunity areas identified including at the Webb Ellis Industrial Estate currently where local NHS mental health services are currently delivered from.
- 4.196 Any future development and investment must seek to preserve and enhance the historic character of the site, in line with the Council's latest Conservation Area Appraisal and the principles of this Regeneration Strategy.
- 4.197 There is a scope for more significant development along Corporation Street as part of the street's wider transformation. Conversion of some of the car parking north of the RAGM into a new public space could benefit from the creation of a single storey pavilion structure to create positive activation, commercial return, and facilitate linked trips.
- 4.198 Although not captured as development outputs, the Regeneration Strategy notes the potential to bring vacant commercial floorspace back into use (for continued commercial use), and activation of upper floors (for commercial or residential use) across this character area.



Market Place



Sheep Street



Rugby Art Gallery and Museum



HIGH STREET

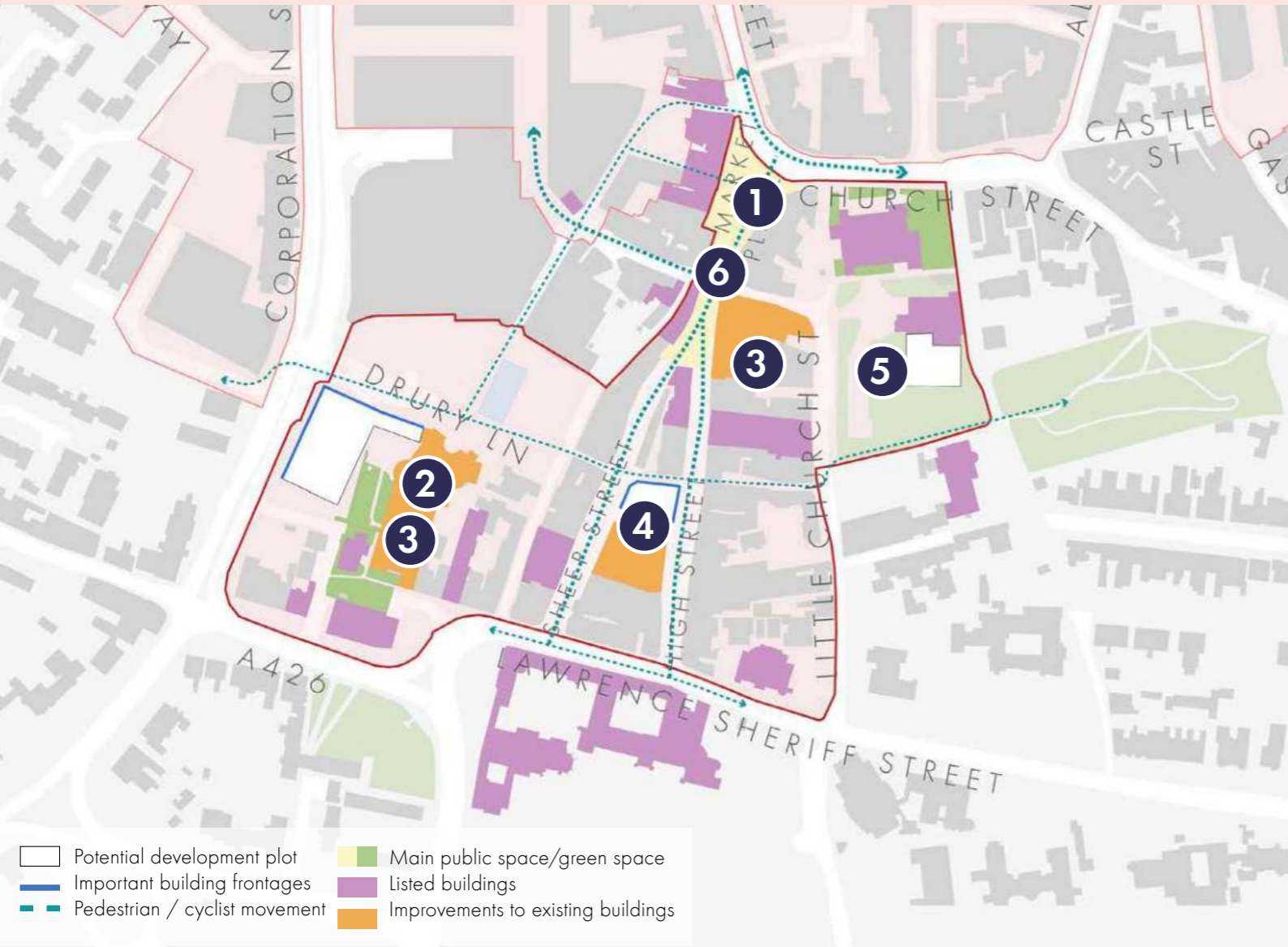


Fig 43 High Street Framework plan (numbers relate to key points below)

Key points

1. A future enhanced Rugby Market offer will be a key anchor and footfall driver within this character area. A 'business as usual' approach is not supported – with the Regeneration Strategy noting the catalytic nature of this project if it can create an improved and diversified which better activates this area of the town centre.
2. Potential location for the Rugby Hub if progressed applying a 'multi-site' strategy, which could include partial occupation of RAGM by the Council and occupation of some space within vacant / underutilised retail uses as a 'front door' increasing accessibility to the community.
3. An alternative investment strategy for RAGM will need to be established if not progressed as a Rugby Hub location. It is critical to intensify and enhance the cultural and visitor offer

Storeys (exc. single storeys structures)	2-4
Potential land uses	Hospitality, workspace, retail/ food and beverage /leisure
Approx. GEA (new and refurbished)	27,000m ²
Dwellings	0

Fig 44 Summary of indicative development approach

within the facility to attract more footfall and act as a credible anchor in the south of the area, including potential alignment with future plans for Benn Hall.

4. Opportunity to deliver new flexible, office-based workspace into the town centre in vacant or underutilised units to diversify both uses and nature of footfall in this area, supporting wider retail uses. The Regeneration Strategy supports the potential exploration of this on a meanwhile basis to test the market and create investor and occupier interest.
5. Important to realise investment in former Herbert Gray College to bring an important asset back into positive use and activate the Church Park and Holy Trinity Graveyard area to ensure improvements to this area as town centre amenity space.
6. Focused programme of events and activities, linked to and independent of Rugby Market, to strengthen Market Place, alongside public realm and greening improvements to High Street and Sheep Street. This character area is recognised as an important location within the meanwhile strategy supporting this Regeneration Strategy.

Movement and Public Realm

4.199 The key movement and public realm interventions include:

- Addressing vehicle access, parking, deliveries and loading to reduce the impacts of vehicles on these pedestrianised streets during busy times
- Improving shop fronts and spill out areas to create a more coherent environment
- Improving the quality of the public realm including paving, seating, lighting, trees and greening. Ensuring the public realm changes reflects the character of these important streets and future proofs against climate change
- Introducing street art and features including lighting that help celebrate and integrate these streets with the wider area and support the night-time economy
- Addressing the public realm and highway around the clock tower including the location of taxis to develop a high quality central public space which brings together Rugby Central, North Street / Church Street, Regent Street and other interlinked alleys and streets
- Improving wayfinding and signage to help encourage people to visit these important streets.



HIGH STREET

Phasing and delivery

- 4.200 Change generally across this character is likely to be incremental, with no major development projects identified.
- 4.201 The two primary 'interventions' noted relate to the Rugby Market and RAGM assets – both owned / managed by the Council, so with a degree of influence and control over their future.
- 4.202 The future of RAGM is initially aligned with decision making around the Rugby Hub project. Even if this location is not to be progressed as a short-listed candidate to directly (it is assumed partially) accommodate the requirements coming out of the Rugby Hub project, there is a need to consider the potential implications of any future redevelopment of Benn Hall – and how the current activities it hosts can be accommodated in other locations across the centre. The Regeneration Strategy recognises the potential important role that RAGM may have in the future in that context.
- 4.203 Rugby Market as a project is perhaps more straightforward. The Council is currently securing a new operator for the market. The Council brief for the operator clearly states its aspirations to enhance the current offer to ensure the long-term sustainability and vibrancy of the market as a key part of the town centre offer.
- 4.204 The Regeneration Strategy supports this process, and advocates for alignment between the future market strategy and the meanwhile strategy. In combination, these two should include a credible programme for greater activation across the pedestrianised areas of High Street and Sheep Street, and facilitate footfall on multiple days of the week / all year round. This will need to include a review of whether there is appropriate / sufficient infrastructure across the public realm in these locations and investment if and where necessary to facilitate the market / meanwhile strategy implementation in the future.

4.205 The Council may directly intervene in other ways within this location, but that is still assumed to be on an incremental / opportunistic basis. Any such intervention would likely involve taking headleases on vacant units or acquiring vacant units, to facilitate meanwhile delivery including taking occupier risks for businesses that align with ambitions for this location but wouldn't otherwise have the covenant strength to secure space from the market.

SHORT-TERM

- Let contract relating to operation of Rugby Market and progress in partnership to finalise a meanwhile strategy for the town centre, including identification of implementation and funding plan (factoring in commercialisation / returns that could be generated).
- Resolve interface between Rugby Hub project and this character area – including both establishment of whether there is potential to accommodate Council or other public sector employees and services on a multi-building basis, and likely implications for Benn Hall.
- Potential for Council to directly intervene in vacant and underutilised retail units through use of its covenant strength to enable positive activation.
- Potential need to invest in the public realm to support market and meanwhile strategy implementation

LONG-TERM

- Completion of investment at former Herbert Gray College which will have been brought back into positive use and will activate and create surveillance across the Church Park and Holy Trinity Graveyard area.
- Establishment of more formal / market led approach to reuse of vacant units – with the Council stepping out and the market stepping in to deliver flexible business space, activate upper floors, and take greater market risks on occupiers as the areas vibrancy becomes more established.



Fig 45 Plan illustrating the indicative approach to the High Street - High Street and Sheep Street will remain the focus of the historic heart of Rugby town centre. Opportunities to strengthen the range of uses, alongside streetscape and public realm improvements will play a key role in strengthening this area including Market Place.



The opportunity

- 4.206 'Old Town' sits right at the heart of the Regeneration Strategy. The ambition to connect through from the station to Rounds Gardens puts huge focus on this area as an important piece of the wider jigsaw. With significant change coming forward at Rugby Central, balance is sought over North Street in this character to ensure value, footfall and investment is spread.
- 4.207 As the northern concentration of notable heritage assets within the town centre, this is already a vibrant independent quarter with real character and which has a significant positive contribution to the wider area. This is perhaps most notable in Regent Street, but nestled in this area more widely are shops, cafés, businesses, cultural attractions, and perhaps less notably the North Street surface level car park.
- 4.208 The Regeneration Strategy seeks to pursue a balanced strategy for Old Town – reflecting both identified (but focused) development opportunity, alongside retaining and growing that special independent and therefore unique offer embedded in this area.

The area today

- 4.209 The area defined as 'Old Town' within the Regeneration Strategy includes the northern end of the Rugby town centre Conservation Area, plus car parking and retail units fronting onto North Street. It is perhaps a tale of two halves in reality – Regent Street and the area to the east, and everything to the west.
- 4.210 Regent Street and the area to the east is perhaps the area of Rugby town centre that feels most like a market town. Heritage is noted in street furniture, and it is positively littered throughout the buildings of the area – but in particular around Regent Street and Regent Place.
- 4.211 The level of vibrancy across these buildings is notable – including ground and upper floors, and a business community beyond retail, cafés and restaurants. Regent Street and Regent

Place are primarily Edwardian in age and character, with strong street frontage that is not materially impacted by on-street parking prevalent across the area.

- 4.212 Perhaps less attractive and of a different scale and nature, are the retail units fronting onto North Street. These units sit on the other side of the North Street car park from Regent Street, and along with the car park itself are outside of the Conservation Area.
- 4.213 These units take on more of a traditional 'high street' character but are relatively poor in quality and are significantly undermined by the busy North Street environment. Upper ground floors are less active, and the architectural design is generally not as noticeable.
- 4.214 There are some important uses along North Street that are noted including banks / building societies, and the Citizens Advice Bureau (which could be integrated into the Rugby Hub in the future). There are also public toilets located on North Street.
- 4.215 The surface level car park is of a relatively poor quality. It is largely surrounded by the service yards of adjacent buildings, is not positively overlooked and lighting is poor. The footpath connecting Regent Street with North Street runs through North Street car park which is an unattractive route, where pedestrians also come into contact with turning vehicles.

Development and Design Strategy

- 4.216 If the area is a tale of two halves, then the development and design strategy is perhaps appropriate to be considered in the same way. For the heritage rich areas of Old Town, the Regeneration Strategy seeks to protect and enhance the character that already exists.
- 4.217 The current offering in the Old Town character area includes a successful mix of leisure, independent retail, food and beverage and cultural uses with a strong heritage feel due to the traditional streets and older buildings.
- 4.218 The future vision of the area focuses on retaining this strong cultural and leisure offer

so it will remain as the independent, heritage quarter for Rugby town centre.

- 4.219 To further support this area, the east-west routes will be strengthened, specifically with an improvement through the arched passageway between Henry Street and North Street car park. This would create opportunity for a reimagining of North Street with new food and beverage uses, or possibly Rugby Market, as well as creating a direct link to the new development at Rugby Central.
- 4.220 Development on North Street car park could create and activate a key linkage right through the centre – ultimately linking Rounds Gardens, through Corporation Street West, Rugby Central, Old Town and ultimately to the Rugby Station. This could be the home of the Rugby Hub, commercial offices, and/or a hotel, alongside the delivery of new open space in the centre.
- 4.221 The development potential at North Street car park is considered to be more attractive to the private sector if combined with frontage onto North Street itself. This is especially important alongside the planned investment in North Street – creating a more attractive frontage for any future development to address. Key Third Party ownerships in the context are noted alongside North Street in the Regeneration Strategy – but should be explored more widely to maximise this frontage potential in the future.
- 4.222 The Old Town area requires a sensitive approach, as the majority of development opportunities are focused around infill development or refurbishment of existing buildings. Regent Street has an attractive townscape character.
- 4.223 Key development opportunities on North Street car park will need to be considered carefully in relation to daylight, orientation and proximity to existing buildings, alongside the creation of a successful space.
- 4.224 Proposals for buildings fronting North Street should seek to create attractive, active ground floors.



Regent Street



Church Street



North Street Car Park



OLD TOWN

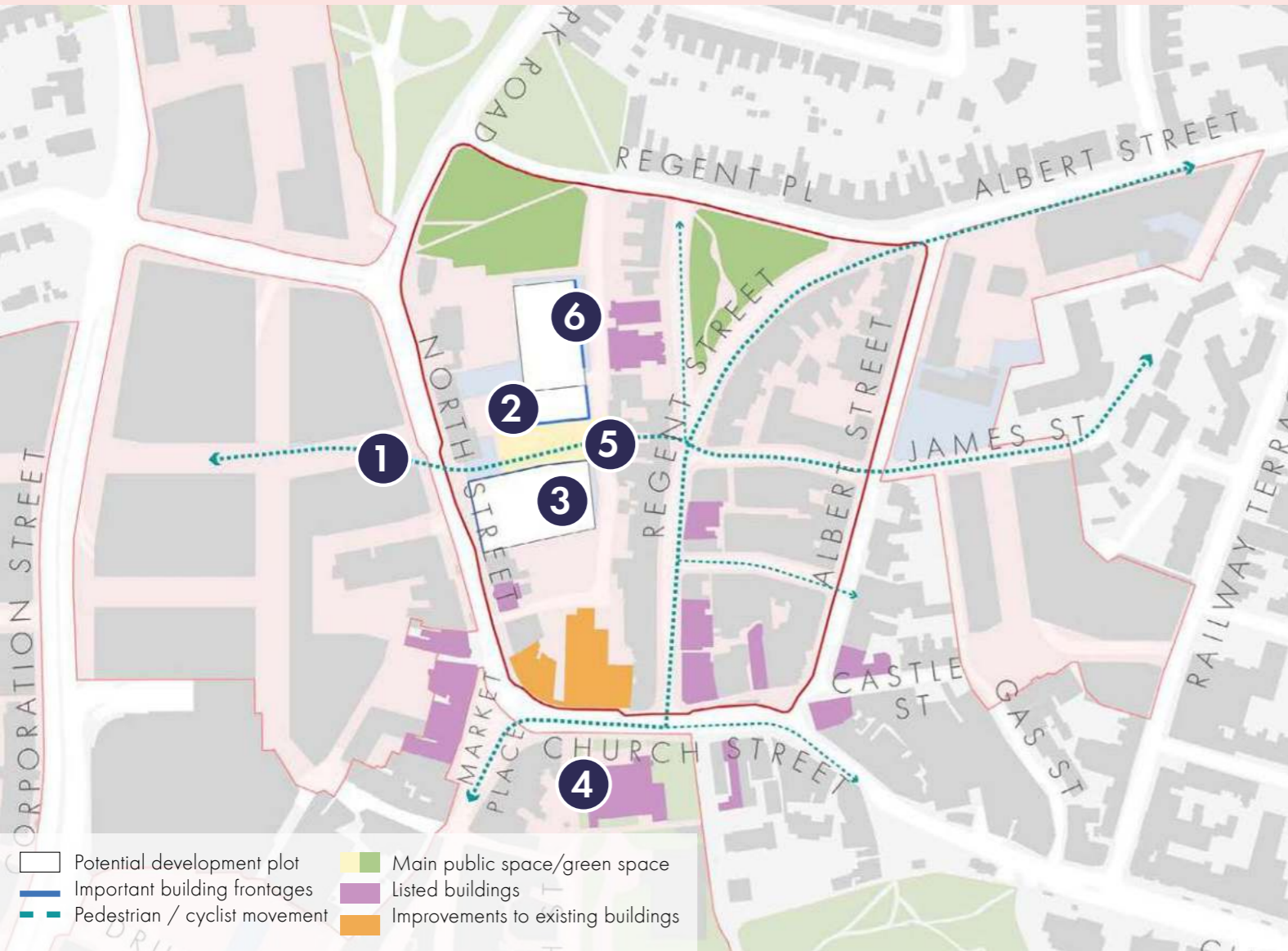


Fig 46 Old Town Framework plan (numbers relate to key points below)

Key points

1. This is a key character area in delivering continuous east-west connections through the heart of the town centre from Rugby station to Rounds Gardens. Rather than simply treating this as a route for a new footpath, the Regeneration Strategy seeks to deliver development that creates positive frontage, encourages dwell time, and supports a high-quality experience for people making the journey.
2. North Street is considered to be an opportunity for early car park closure – with the Regeneration Strategy advocating that this is pursued initially alongside a meanwhile activity to test impacts and inform the thinking in the car parking and enabling development strategy.

Storeys	3-4
Potential land uses	Workspace, residential, retail/food and beverage / leisure
Approx. GEA (new and refurbished)	20,000m ²
Dwellings	30

Fig 47 Summary of indicative development approach

3. Long term the permanent redevelopment of North Street car park is assumed, and is suggested as a potential home for the Rugby Hub development. If Third Party interests along North Street can be secured, the private sector appeal of this development site is enhanced – based on both critical mass and frontage to an improved North Street area – noting Rugby Central investment on the other side of the road.
4. Any future frontage to the south, if relevant third party interests are secured, must have regard to the setting of St Andrew’s Church, grounds and park, and seek to enhance this where possible.
5. The design of any future development on the North Street car park should consider delivery of new public space integrated into the proposals including green infrastructure.
6. The Regeneration Strategy has noted the potential to implement a temporary closure strategy for the car park, alongside the introduction of a meanwhile use – to encourage new activities in the area, potentially undertake an area-specific consultation exercise, and understand the implications of closure on wider car parking as part of the car parking and enabling development strategy process.

Movement and Public Realm

4.225 The key movement and public realm interventions include:

- Improving the quality of the streets and spaces on Regents Street, Bank Street, Albert Street and Henry Street including, where possible, footway widening, crossings, parklets to enable shop spill out / seating, relocation and rationalisation of parking and improved loading and unloading arrangements
- Improving existing, and future proofing future east-west links which enable pedestrians and cyclists to navigate safely, conveniently and enjoyably through the area during the day and night times
- In the short term, addressing the existing car parking access arrangements including junction, crossing and signage improvements to reduce the impacts of vehicles on pedestrian access and movement. Also in the short term, trialling the temporary closure of North Street car park for meanwhile use. In the longer term, the aim is to release this car park for development, public realm and greening improvements.
- Improving wayfinding and signage to help encourage people to visit these important streets
- Improving access and enjoyment of the existing green space including seating, lighting, as well as sustainable drainage systems to help future proof climate change.
- Introduce additional public realm, green and blue infrastructure measures as part of future development
- Ensure development that is founded on car-free or car-lite principles and supported by high quality walking, cycling, micro-mobility, bus and taxi infrastructure.

Phasing and delivery

4.226 The main area of development potential noted within the Old Town character area relates to the North Street car park. As with a number of the character areas, the long term solution for North Street needs to be informed by decision making around the Rugby Hub project.

4.227 If progressed for private sector development and investment purposes (i.e. if the area is not needed or considered not appropriate for the Rugby Hub project), it is considered that the value proposition of the North Street would be enhanced if considered alongside adjacent third party interests. This would require land assembly by Rugby Council, including the potential need to use CPO powers to secure interests required.

4.228 The Regeneration Strategy focuses this effort on properties / interests that would create frontage onto North Street.

4.229 Whilst this is an area likely to be realised in terms of a permanent development proposition in the medium term (given need to build in decision making relating to the Rugby Hub, relating to the closure of the car park, and potential third party land acquisitions), the Regeneration Strategy encourages immediate change in the area – through temporary car parking closure and introduction of meanwhile uses.

SHORT-TERM

- Resolve interface between Rugby Hub project and this character area – including both establishment of whether there is potential to accommodate Council or other public sector employees and services on the North Street car park.
- Identify / secure capital programme and commence third party interest engagement to enable land assembly to maximise value of North Street car park from development perspective (most significant if pursuing

private sector-led development in the area).

- Finalisation of town centre car parking and development enabling strategy to inform case for and timing of permanent closure of car park – including integration of findings from temporary closure of North Street car park.
- Temporary closure of North Street car park and introduction of meanwhile use. This will require careful engagement, monitoring and consultation.
- Secure funding for North Street corridor improvements.



Fig 48 Plan illustrating the indicative approach to Old Town in context - proposals to enliven the North Street car park area will help to support the east-west connection from the Old Market character area to Rugby Central via Regent Street.



OLD MARKET

The opportunity

- 4.230 Old Market is a vibrant place with independent retailers, a diverse food and beverage provision and leisure activities. The Regeneration Strategy aims to enhance this offering and bring forward new complementary uses that build on the existing heritage of the heritage of the area.
- 4.231 The scale of the opportunity with the Old Market is linked to a number of important public sector ownerships. These include surface car parking and, longer-term, the John Barford multi-storey car park, subject to the completion of the car parking and development enabling strategy. There is a further underutilised Council depot in the area at Albert Street that has the potential for redevelopment. The Job Centre could be encompassed within the Rugby Hub and therefore released as a building for redevelopment purposes.
- 4.232 Old Market has an important role as part of the connecting experience between the Station and the core of the town centre through St James Street into Old Town. Within this area, the development opportunity, whilst generally infill in nature, in total combines to create significant potential for change. To attract private sector investment there may be a need to create a package of development opportunities.

The area today

- 4.233 Old Market is a mishmash of heritage retail frontages, dated office buildings (including for example the BT exchange, Jobcentre), surface level and multi-storey car parks, and low rise residential uses. It has some green spaces, but limited green streetscapes.
- 4.234 Whilst some streets work well and are animated (including for example large parts of Albert Street, Henry Street and Bank Street), more could be done to create a cohesive place that connects into the town centre core.
- 4.235 The northern quadrant is particularly poor

with a series of dated office buildings that appear underutilised and aged. This could be reimagined to deliver some employment floorspace but with growing demand for small format office space within flexible floorplates and a rush for quality as businesses downsize, it is questionable how attractive this space would be.

- 4.236 There is an over provision of surface car parks in this area including Gas Street and Old Market Place, as well as John Barford multi-storey car park. Given the ambition to shift to more sustainable modes of transport across the town centre, and if the capacity could be met elsewhere (including for example the Regeneration Strategy recommending consideration of an interceptor car park in the Town Hall character area), this collectively creates a significant quantum of potential developable land.
- 4.237 Routes and wayfinding through the character area are limited – creating a relatively disjointed relationship with adjacent character areas, and undermining strategic connections through to the Station in the north / north-east.

Development and Design Strategy

- 4.238 The long-term release of car parking within the Old Market area, alongside redevelopment of underutilised buildings (including Council assets) and improvement of the existing neighbourhood holds the key to creating a more vibrant area.
- 4.239 The Regeneration Strategy recommends that this area is progressed to facilitate mixed-use development, including retail and leisure uses at the end of Castle Street, alongside new housing. The area is also being considered as a location for the Rugby Hub development – specifically relating to the Council depot site on Albert Street.
- 4.240 The focus will be mainly infill residential development, to deliver new apartments to suit residents wanting to live in a vibrant, core town centre location. Some retail, leisure and food and beverage use could come forward as part

of the ground floors, to further help animate the streets and build on the attractive, engaging environment.

- 4.241 Residential development should front onto a new lane and Gas Street, and it is also noted as an opportunity on the Council depot site – subject to decision making around Rugby Hub.
- 4.242 There is a real opportunity to create a new core route through the character area, linking through St James Street into Old Town. This will provide a key link from station through to the core town centre.
- 4.243 There is an opportunity to consider this location for Rugby Market, or other meanwhile uses. This would help to draw crowds and footfall to the area, creating opportunities for the community to come together and interact with the town centre. This would most likely be accommodated on the Old Market car park, which could also provide a good opportunity to deliver much needed public realm, to enhance the environment for the existing and new residents.
- 4.244 The redevelopment of the Job centre and Council depot could come forward in the first instance and deliver infill residential development, to align with the surrounding residential schemes coming forward. This will transform the underutilised assets, bring new residents into the town centre.
- 4.245 The potential reuse of Gas Street car park could come forward quite quickly, but it is linked to the outcome of the town centre car parking study. This could be taken forward as a good site for Rugby Market, or any meanwhile use that could help to animate the area, and draw visitors in.
- 4.246 Similarly, the redevelopment of John Barford multi-storey car park will be linked to the ability to rationalise the car parking capacity elsewhere. It may have to form part of a longer term movement strategy and be an interim interceptor car park with redevelopment potential in the future.



Old Market Place Car Park



Albert Street



John Barford MSCP



OLD MARKET



Fig 49 Old Market Framework plan (numbers relate to key points on page 149)

4.247 Longer term opportunities are associated with the redevelopment of the BT Exchange building, which tends to be complex in its nature to re-provided those uses elsewhere. Future development of this could see the delivery of new employment spaces and residential which is in keeping with the character of the existing townscape and built envelope.

4.248 The Old Market area offers several significant development opportunities which, depending on their proximity to existing buildings, could establish potential for new development of up to 5 storeys. It is important that development on Albert Street and Railway Terrace fits into the existing townscape, creating a strong address to these key town centre streets.

4.249 Existing connections could be strengthened to tie into adjacent parts of the town centre. Frontages onto key streets and the proposed new space should be strengthened.

Storeys	2-5
Potential land uses	Residential, retail/ food and beverage /leisure
Approx. GEA (new and refurbished)	26,000m ²
Dwellings	210

Fig 50 Summary of indicative development approach

Key points

1. Whilst development in this area is likely to come forward over time, its more incremental nature may require sites to be packaged up to attract private sector investment and leverage high quality development in the area.
2. Whilst the strategy is likely to see the loss of surface level car parking in the short term, the Regeneration Strategy advocates retention of areas of public realm which could be activated through meanwhile or market use and should have at least occasional use for community and resident amenity in the area. This will create a high quality focus at the end of Castle Street.
3. A number of potential redevelopment sites are identified – subject to progression of decision making around the Rugby. In the medium term these include the Albert Street Council depot and the Job Centre. Longer term, the BT Exchange may become available for development, as could John Barford multi-story car park.

Movement and Public Realm

4.250 The key movement and public realm interventions include:

- In the short term, improving the access and wayfinding to John Barford multi-storey car park as well as the quality of the car park itself, including security provision and tariffs to encourage more visitors to use this car park rather than travel into the centre and use the surface car parks
- In the longer term, this car park has been identified as a potential redevelopment site. However, the redevelopment of this car park would need to be carefully considered alongside the potential loss of other surface car parks and the redevelopment of multi-storey car park at Rugby Central. It may be that an interceptor car park will be required on the Town Hall site to compensate such losses, however this would be fully considered as part of a development enabling parking study.
- Creating a high quality public space including trees, planting and blue infrastructure, where appropriate. The space should be designed with flexibility in mind, enabling it to be used for meanwhile uses, where needed, throughout the year
- Improving the links and alley ways from the Old Market to the town centre and Rugby Station including paving, surveillance and lighting
- Ensuring future development is founded on car-free or car-lite principles and supported by high quality walking, cycling, micro-mobility, bus infrastructure, where appropriate

OLD MARKET

Phasing and delivery

4.251 When more certainty is established around the Albert Street depot and decisions regarding the potential release of the job centre building associated with the Rugby Hub project, there is potential to create a package of development opportunities within this area should be considered. In isolation, sites may not leverage the value to enable sufficient quality of development to be brought forward.

4.252 This approach is likely to push delivery in the area into the long term, but this further allows strategy around John Barford multi-storey car park to be factored into the package (or not) and allows the area to build on wider market activity across the town centre.

4.253 Meanwhile uses on the surface level car park should be pursued in the interim period.

4.254 The delivery of the BT Exchange is complex in nature due to the inherent activity on site, and challenging with moving the operation to a suitable site. Early engagement with BT is required, and it may be that the site is protected by a site allocation to earmark it for longer term redevelopment opportunities.

SHORT-TERM

- Resolve interface between Rugby Hub project and this character area – including both establishment of whether it is intended to deliver the project in this location, the release of Albert Street, and the future of the Job Centre.
- Complete a car parking and development enabling strategy to determine if (and if so, when) Gas Street, Old Market and John Barford multi-storey car parks can be released for redevelopment.
- Engage with BT regarding operations and potential longer-term relocation, to determine prospects of, and timescales for, redevelopment.
- Engage with new market operators to determine whether it should be relocated to

Gas Street car park and how an integrated meanwhile strategy can be developed. The Regeneration Strategy favours the retention of the market within the High Street / Sheep Street area, but recognises that Old Market is a location being considered for a new market offer. Delivering a new market in this location would reduce wider development potential.

- Delivery of a positive route through the area, with active frontages, connecting through St James Street to the town centre core will be important and align with the approach across the wider character areas. Aligned with meanwhile use and potential 'plant and paint' interventions – this needs to be implemented at least as temporary improvements to the routing before any long term development is realised.
- Soft market test development proposition to inform optioneering of delivery options relating to publicly owned assets.

MEDIUM-TERM

- Delivery of new public realm on Old Market car park to positively transform the environment and make it more inviting for residents integrated within the wider development proposition – with the potential for partial market accommodation or meanwhile use here in the future.



Fig 51 Plan illustrating the indicative approach to Old Market in context - this cluster of sites is a key stepping stone between the edge of the town centre and the station gateway area, suitable for a range of uses, and strengthening the improvement to east-west linkages between Corporation Street and Railway Terrace via Old Town and Rugby Central.

WEBB ELLIS INDUSTRIAL ESTATE

The opportunity

- 4.255 The Regeneration Strategy recognises the important function that Webb Ellis Industrial plays within the local economy and wants to ensure that employment is protected, and the estate remains modern and fit for purpose in this context.
- 4.256 It identifies the potential to take advantage of increasing demand for flexible and small business space in this context, alongside more widely the potential to release some land for alternative development purposes.
- 4.257 The focus will be making best use of the employment location, championing intensified mixed-use (workspace and industrial) typologies. This is integral to ensure that there is sufficient commercial floorspace to support SMEs in Rugby, to deter relocation to other town centres or fringe locations.
- 4.258 There is an opportunity to rethink the NHS provision in this location and consider opportunity to consolidate with other public sector activities. This could release land to the south of Woodside Park adjacent to existing residential uses (to the south), and potentially in combination with underutilised commercial space to the west.
- 4.259 South of Woodside Park, in the medium to long term, the Regeneration Strategy identifies the potential to deliver new homes – subject to decision making associated with the current occupiers of the space. This residential development could take the form of a new live-work neighbourhood that capitalises on the existing employment context and connectivity to Rugby College (via the Black Path) and Rugby Station.
- 4.260 This will be a long term consideration, in order to preserve and protect the businesses that are already present. Strong business engagement and coordination will be required, to ensure that the current ecosystem remains.

The area today

- 4.261 The Webb Ellis character area is located to the west of the Station Gateway, with the railway tracks bordering the northern frontage. There is currently only one access into the site via Woodside Park, which is shared with new housing coming forward at the eastern corner where it meets Wood Street. The Black path runs across and above the character area and provides access to the back of Rugby College on the other side of the tracks.
- 4.262 The site is an important town centre for employment uses which should be retained in the medium term. It is well-occupied by the number of local industrial businesses; mainly trade counters and garages.
- 4.263 Whilst the area clearly operates as a successful business location, it has very little direct connectivity into the town centre and is relatively isolated in terms of amenity provision.
- 4.264 The existing environment feels relatively disconnected from the surrounding residential streets which form an important connection towards the Town Hall, Caldecott Park and the station.



The Black Path

Development and Design Strategy

- 4.265 In the future, the Webb Ellis Industrial Estate should be retained as an important location for commercial floorspace, but over time should be sought for intensification – including subject to values the opportunity to support stacked typologies / multi-business units, and more flexible work-shop style small business provision. This should be sensitive to the existing urban context and be predominantly low rise.
- 4.266 As part of the Rugby Hub project, and the strategy for the High Street / Sheep Sheet character area, there is the prospect of the relocation of the NHS from their current Sidings based at Webb Ellis. If this relocation takes place, the NHS would seek to maximise the value from their asset. If it could be delivered

alongside the adjacent underutilised business space, it is considered that the area has potential for residential development. The Regeneration Strategy assumes in this scenario that a mix of family and flatted homes should be delivered. Residential uses would only be appropriate on the Wood Street frontage, with the core part of the estate retaining an employment character – at least at ground floor.

- 4.267 Improvements to the Black Path will be leveraged through developer contributions associated with any future development in the area to improve north-south connections over the railway line for pedestrians and cyclists.



Fig 52 Plan illustrating the indicative approach to Webb Ellis Industrial Estate in context - this area will continue to be a key location for workspace, alongside streetscape and environmental improvements, including The Black Path.

WEBB ELLIS INDUSTRIAL ESTATE



Fig 53 Webb Ellis Industrial Estate Framework plan (numbers relate to key points below)

Key points

1. It is important for the Webb Ellis area to retain an important employment character in the future – but recognition that over time this will require investment, improvement and intensification to ensure its vibrancy. Long term potential for multi-business units, flexible space and small business space are likely to be important. This is particularly significant north of Woodside Park, and in buildings with frontage on to Woodside Park, and could result in an increase in business floorspace in the area.
2. Where land to the south of Woodside Park is released from currently use, and where sites can be combined to create critical mix, the Regeneration Strategy identifies the potential to deliver a new mixed-use residential-led neighbourhood, with potential ‘clean’ employment and workspace frontage to Woodside Park and residential frontage to Wood Street.

Storeys	3-6
Potential land uses	Workspace, residential
Approx. GEA (new and refurbished)	43,000m ²
Dwellings	190

Fig 54 Summary of indicative development approach

3. Improvements to The Black Path are considered important as part of the wider town centre strategy to create a safer, more welcoming environment and improved north-south connections between the centre, to Caldecott Park and the college over the railway line.

Movement and Public Realm

4.268 The key movement and public realm interventions include:

- Sustainably integrating the existing site and future development with the wider area including Rugby Station, retail parks, town centre and surrounding neighbourhoods through bus route and stop improvements, walking and cycling measures, junction and crossing improvements, parking improvements and signage, notably on Wood Street and Woodside Park
- Improving the Black Path link including surveillance, lighting and the quality of the public realm
- Improving parking, delivery and servicing arrangements within the existing site including the potential for a town centre last-mile delivery hub
- Ensuring future development is founded on car-free or car-lite principles and supported by high quality walking, cycling, micro-mobility, bus infrastructure.

Phasing and delivery

- 4.269 Subject to decision making by the NHS around the Sidings, this area is considered to be a long term area of change and development potential.
- 4.270 The ability to deliver an intensified and comprehensive employment offer will be hinged on early engagement with businesses and Third Party land owners. This will require strong relationships to be built, to ensure that businesses are not ‘pushed out’ and are able to collective work with the Council to return should they wish to do so. It is important that a comprehensive scheme is considered, rather

than a piecemeal approach. This will allow for greater development densities to be achieved, and allow for reconfiguration of the internal servicing road to be delivered to improve access for business and residents.

- 4.271 Engagement with the Local Enterprise Partnership (LEP) could determine whether there is alternative workspace typologies to consider, and funding available to deliver the commercial elements of development proposed. The LEP may have a view on the approach to long term management and workspace providers aligned with and to inform the strategy for this area.

SHORT-TERM

- Resolve interface between Rugby Hub project and this character area – including both establishment of whether there is potential to accommodate NHS activities within the town centre core, and therefore release development land within Webb Ellis.
- Engage with landowners on the future potential of the industrial estate. Proceed with business engagement to understand space requirements, or future relocation ambitions. Consider land assembly of interest adjacent to NHS land holdings to consolidate development area.
- Engage with LEP on the opportunity to deliver workspace / industrial typologies. Understand their future space requirements from wider businesses.

LONG-TERM

- If required, public sector intervention in form of funding or land assembly to facilitate business intensification to secure long term resilience of employment area.
- Redevelopment of NHS land (if relocated) alongside adjacent underutilised land holding.
- Delivery of improvement to the Black Path (if funded via development, to be accelerated if public funding is available).
- Potentially delivery of a town centre last-mile hub within the site from which cargo bikes and e-vehicles dispense and deliver goods to businesses and properties in the town centre.

STATION GATEWAY

The opportunity

- 4.272 The Station Gateway character area has the opportunity to deliver significant change, particularly in terms of creating a high-quality arrival and interchange experience for residents and visitors arriving by train, building on the West Coast Mainline as a key asset for the town centre. In the future this will be an important urban residential community with its roots in Rugby town centre.
- 4.273 This is an area of the town centre that is witnessing the most private sector development and interest to date. This presents an important opportunity to both capitalise on the momentum already being created, and to drive-up quality of development and value and therefore viability over time.
- 4.274 There is an opportunity to rethink the station arrival environment, the interchange with other transport modes including buses, taxis and micro-mobility, as well as how to better integrate this important asset with the core of the town centre and wider neighbourhoods.
- 4.275 Focused improvements to the public spaces outside the station to create a more attractive and legible environment are required. This needs to be alongside long-term investment in the station building and improvements to the northern access to the station by Network Rail. A contemporary, coherent and co-ordinated approach also is necessary to improve links into the town centre by foot, bicycle, buses and taxis.
- 4.276 Given the nature of activity already noted in this area, the Regeneration Strategy has a primary objective to ensure an increased quality of development and public realm delivery over time, and prioritises improving connectivity north and south over and under the railway line to create further investment opportunity, and critically from the station to the town centre.

The area today

- 4.277 The Station Gateway character area is severed by the railway line, Rugby Station building, surface level car parking and a congested road network due to the constraints under the railway arches on Mill Road. These constraints consequently have a negative impact on rail passenger arrival experience, pedestrian and cyclist safety, bus accessibility and air quality.
- 4.278 The area suffers from poor legibility and limited long distance sight lines or aspects due to the topography and 'heavy' nature of activities in the area including for example the prominent Stagecoach bus depot on Railway Terrace, which places a greater important on delivering a revised station arrival.
- 4.279 There are several surface car parks as well as a station multi-storey car park, which generate traffic and further impact on the local environment. The Regeneration Strategy supports the exploration of the potential consolidation of surface car parking across the town centre including in this character area, which could in turn release significant areas of land for redevelopment, greater integration of active and sustainable transport, and additional positive placemaking interventions.
- 4.280 The existing main routes between Rugby Station to the town centre are along Murray Road and Railway Terrace are currently poorly connected whether by foot, bicycle or by bus. The quality of the public realm, wayfinding and signage on both these routes are also very poor impacting on the experience of those arriving by rail.
- 4.281 Notwithstanding this relatively challenging context for investment, change and private-sector investment is already underway within the Station Gateway character area. The Market Quarter scheme is set to deliver new private rented tenure apartments, and a planning application has been submitted for Myson House to provide new apartments. This provides a precedent for future housing delivery

in the area. These provide some, but limited, green spaces for the wider community to enjoy. Future development proposals seeks to address this, to build on and help to 'green' the current harsh environment.

- 4.282 Rugby College sits to the north of the character area and is cut-off from the town centre uses. There is an opportunity to refocus key north-south routes to ensure that the College is well connected and are able to take access the town centre offer.

Development and Design Strategy

- 4.283 The focus for Station Gateway should be about delivering an improved gateway to Rugby town centre, a 21st century multi-modal transport hub and, capitalising on the location and the changing market in this area, to build new residential development.
- 4.284 A multi-modal transport hub in this location would help modernise and future-proof both local and regional services linking the town centre to a wider catchment area, future growth areas, as well as create a enhanced sense of arrival and connectivity for visitors. More generally, improved public realm and signposting in this location will help to improve the legibility of the town centre, particularly the key walking, cycling and bus routes.
- 4.285 The residential offer in this location should be reflective of the high transport connectivity and urban location of the character area. Residential development opportunities should be focused on providing a variety of dwelling types – to ensure a diverse market and no over-exposure in tenure terms, also creating a balance community in this location in the future.
- 4.286 The market analysis undertaken as part of the Regeneration Strategy process and residential schemes already underway, support the potential to deliver higher density homes to suit young professionals, small and growing families, and the elderly – i.e. the delivery of apartments (private and rented tenure), as well as Extra Care scheme.



Rugby Station approach



Stagecoach bus depot



Railway Terrace and Mysom House



STATION GATEWAY

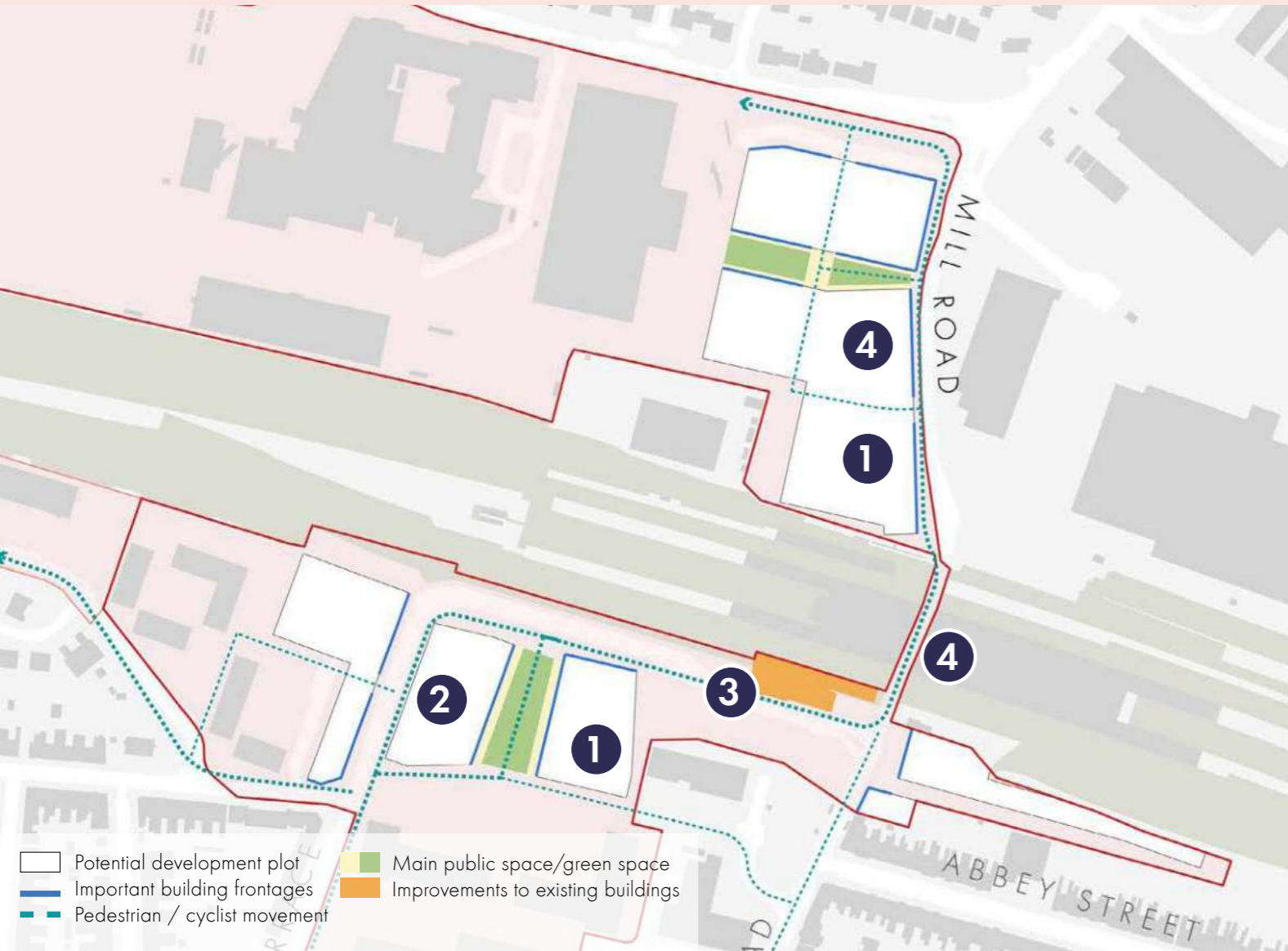


Fig 55 Station Gateway Framework plan (numbers relate to key points on page 159)

4.287 The housing offer should be supported primarily by some amenity retail and workspace at ground floors – to provide a place to live and work, but without undermining the core of the town centre as the primary retail and commercial hub of Rugby. These uses will activate key routes and create safety and vibrancy in this new urban neighbourhood. Delivery of green infrastructure through the residential developments and public realm is integral to supporting the community in terms of amenity and active lifestyles, and providing a high-quality residential environment.

4.288 There is potential to transform the overall quality of the townscape in this location, creating a much stronger sense of arrival in Rugby.

Storeys	2-5
Potential land uses	Residential, workspace, retail/ food and beverage /leisure
Approx. GEA (new and refurbished)	79,000m ²
Dwellings	660

Fig 56 Summary of indicative development approach

4.289 This will be hinged on the ability to coordinate across both public and private sector parties, to create buy-in to a wider vision and scale of change potential identified. By doing, so this creates the ability to have a more legible and inviting station arrival and environment – it will enable the density of development to come forward which maximises the housing offer and takes advantage of the station's rail connectivity to London. It will enable the ability to shift Rugby's reliance on more sustainable modes of transport, and ensure it has a 21st century transport system.

4.290 The change proposed for Station Gateway is comprehensive and can come forward across the medium to long term. To avoid piecemeal development, and to maximise the ability to deliver improved transport upgrades and connectivity, as well as much needed public realm, a strong vision is required.

4.291 The site has potential for relatively high density development, up to 5 storeys in places, taking advantage of the station's connectivity. There is potential to transform the overall quality of the townscape in this location, creating a much stronger sense of arrival in Rugby.

4.292 The development opportunities identified include assets owned by multiple parties, with the Council having only limited ownership to influence development directly. This includes critical ownership by both Network Rail and Stagecoach – on which future development potential is noted. For Stagecoach in particular delivery of this will require support to relocate its current operations.

Key points

1. Potential to create a new urban residential neighbourhood that attracts and supports a mixed community – making the most of its connectivity on the West Coast Mainline, but with its roots firmly in Rugby town centre. This must target not just a commuter community, but a community that works, shops and spends time in Rugby.
2. Delivery of development and investment in this location will require multiple stakeholders buy-in to the vision, and support for them to enable change to take place. This includes critically the need to relocate the Stagecoach Bus Depot from this area positively.
3. There is the noted potential to deliver focused improvements to the public spaces outside the station to create a more attractive and legible environment. This must include a coordinated approach to buses and taxi provision, alongside the environment for walking, cycling and scooters.
4. Development at scale within the area will enable and leverage investment in improvements to the Mill Road underpass – improving north-south connectivity and safer movement of people through the area. This will be key to increase the appeal and connectivity of development opportunities north of the railway line.

Movement and Public Realm

4.293 The key movement and public realm interventions include:

- Addressing the underpass on Mill Road, and where possible, enabling the opening up of the northern side of the railway tracks to permit access to the station from this side
- Supporting the delivery of a multi-modal hub at the station including buses, taxis, micro-mobility, cycle stands and hire



STATION GATEWAY

- Improving the links between Rugby Station and the town centre including improvements to footways, crossings, junctions, traffic calming measures, bus stop facilities, wayfinding, signage, parking and lighting
 - Improving the links between Rugby Station and the areas to the north of the railway tracks including improvements to footways, crossings, junctions, traffic calming measures, bus stop facilities, wayfinding, signage, parking and lighting
 - Addressing the footbridges over the railway tracks including surveillance measures and cycling improvements
 - Creating green-streets / quietways for walking and cycling that link the station to the town centre, retail parks, green spaces and neighbourhoods
 - Development that is founded on car-free or car-lite principles and supported by high quality public spaces, green and blue infrastructure including sustainable drainage systems.
- Stagecoach and Royal Mail – in relation to the desire to facilitate relocation of Stagecoach from Railway Terrace and Royal Mail from north of the station to another location (to be determined through engagement and exploration of options), to understand potential timescales, barriers and commercial implications. This should include a greater understanding of Stagecoach aspirations to engage with the market on future development potential at their site, and/or opportunity / need for the Council to step in to either support or acquire the interest to facilitate delivery.
 - Network Rail and Avanti – in relation to the desire to improve the station, underpass and the station arrival on both sides of the railway tracks, including need to understanding any opportunity for investment through the West Coast Mainline contract and/or existing planned investments to take place on which greater emphasise and design influence could be place. This could and should include integration of better wayfinding information from the platform to the town centre.
 - Warwickshire County Council and Bus Operators – in relation to creating a streamlined and space efficient transport interchange at the station, to better serve the existing and future community and provide improved sustainable linkages with the town centre.

Phasing and delivery

4.294 Given that the scale of change envisaged across the Station Gateway character is significant, its ultimate delivery and completion is a long-term ambition. However, this is an area of the town centre where development investment is already coming forward – this means there is both momentum to build on, and risk of speculative investment which may not meet the Council's design and delivery aspirations for the area.

4.295 The Regeneration Strategy has identified the need for critical engagement with six important public sector stakeholders within this area, to ensure alignment on vision and principles – and to test and develop a coherent delivery strategy. This is important as the Council is not a major landowner in this area, but delivery is an important part of the wider town centre strategy. These key stakeholders include:

- 4.296 The Council will continue to engage with private sector interests across the area, and will use this Regeneration Strategy to encourage optimum design and development solutions on key sites across the area. This will include seeking to secure private sector contribution into key public realm and movement projects to leverage wider investment in the area.
- 4.297 The Regeneration Strategy notes that any future release of car parking will need to be considered as part of the town centre wide car parking and development enabling strategy, to ensure that decisions do not undermine the overall approach to future proofing car parking and reducing private vehicle dependence in the future.

SHORT-TERM

- Priority engagement with key public sector stakeholders to establish required next steps and role of Council to facilitate desired change within the Station Gateway character area.
- Implement wayfinding strategy, walking, cycling, bus and public realm improvements to improve connectivity between the station and town centre.
- Capture contributions from private sector developments in the area to facilitate delivery of key public realm and movement projects identified.
- Complete car parking and development enabling strategy – to include the car parking provision at the station – and identify car parks to be released and programme for release to inform development strategy.

MEDIUM-TERM

- Facilitate / secure relocation of Stagecoach Depot and Royal Mail.
- Delivery of improvements to underpass (as priority if sufficient funding has been secured).
- Delivery of station improvements (within station and arrival, including interchange if deliverable and viable).

LONG-TERM

- Enable station access to the north of the railway tracks
- Private sector development-led solutions across released sites completed, alongside comprehensive public realm improvements across the area.



Fig 57 Plan illustrating the indicative approach to Station Gateway in context - sites either side of the railway offer an exciting opportunity to enhance this area as a destination and point of arrival.



5 GLOSSARY

Blue Infrastructure: Blue infrastructure usually relates to urban water infrastructure, including ponds, lakes, streams rivers and storm water provision.

Blue Light Services: A term for those emergency services (police, fire services, emergency responders) in the UK, which, in case of an emergency, are allowed to turn on flashing blue lights indicating traffic priority over other motorists.

Business Improvement District: Business Improvement Districts (BID) are business led partnerships which are created through a ballot process to deliver additional services to local businesses. A levy is charged on all business rate payers in addition to the business rates bill in the defined BID area. This levy is used to develop projects which will benefit businesses in the local area.

Built to Rent: Build to Rent (BTR) refers to purpose-built housing designed for rent rather than sale. Schemes usually offer longer tenancy agreements and are often professionally managed by the owner or operator.

Convenience Retail: Retail stores selling everyday essential items, such as food and newspapers.

Coventry and Warwickshire Local Enterprise Partnership: Local Enterprise Partnerships are locally-owned partnerships between local authorities and businesses and play a central role in determining local economic priorities and undertaking activities to drive economic growth and the creation of local jobs. They are also a key vehicle in delivering Government objectives for economic growth and decentralisation, whilst also providing a means for local authorities to

work together with business in order to quicken the economic recovery.

Compulsory Purchase Order: Compulsory purchase is a legal mechanism by which certain bodies (known as 'acquiring authorities') can acquire land without the consent of the owner. Compulsory purchase powers can support the delivery of a range of development, regeneration and infrastructure projects in the public interest. In doing so, they can help to bring about improvements to social, economic and environmental well-being.

Development: Development is defined under the Town and Country Planning Act 1990 as "the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land".

Evidence base: An evidence base is the evidence that any development plan document, especially a core strategy, is based on. It is made up of the views of stakeholders and background facts about the area.

Green Infrastructure: 'Green infrastructure' is a term used to describe the network of natural spaces and corridors in a given area. Green infrastructure assets include open spaces such as parks and gardens, allotments, woodlands, fields, hedges, lakes, ponds, playing fields, coastal habitats, as well as footpaths, cycleways or rivers.

Infrastructure: A collective term for services such as roads, electricity, sewerage, water, children's services, health facilities and recycling and refuse facilities.

Joint Venture: Joint venture partnerships are formed

to initiate property developments when a combination of experience and equity is required from two or more people, who pool in their resources or skills to complete a project.

Local Enterprise Partnership: Local enterprise partnerships (LEPs) are non-statutory bodies responsible for local economic development in England. They are business-led partnerships that bring together the private sector, local authorities and academic and voluntary institutions.

Listed Building: Buildings and structures which have been identified by the Secretary of State for National Heritage as being of special architectural or historic interest and which are subject to the law to ensure their protection and maintenance.

Local Development Scheme (LDS): Sets out the program for the preparation of the local development documents. The first LDS must be submitted to Secretary of State for approval within six months of the commencement date of the Act.

Masterplan: A document outlining the use of land and the overall approach to the design and layout of a development scheme in order to provide detailed guidance for subsequent planning applications.

Meanwhile Use: Meanwhile use of a space refers to the short-term use of temporarily empty buildings or public realm, often during a redevelopment.

Micro-mobility: Refers to transportation using lightweight vehicles such as bicycles or scooters, especially electric ones that may be borrowed as part of a self-service scheme in which people hire vehicles for short-term use within a town or city.

Sustainable Drainage Systems: Sustainable drainage systems or 'SuDs' are drainage solutions that provide an alternative to the direct channelling of surface water through networks of pipes and sewers to nearby watercourses. By mimicking natural drainage regimes, SuDS aim to reduce surface water flooding, improve water quality and enhance the amenity and biodiversity value of the environment.

Urban Greening Factor: The Urban Greening Factor (UGF) is a tool that evaluates and quantifies the amount and quality of urban greening that a scheme provides to inform decisions about appropriate levels of greening in new developments.

Workspace: A flexible workspace, or 'workspace' is an umbrella term to define a work place solution that is rented on a flexible lease term. It can take multiple forms, including co-working, serviced offices, makerspace, Incubators / Accelerators etc.

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Rugby Borough Council

Climate Change and Environmental Impact Assessment

Rugby Borough Community Infrastructure Levy Draft Charging Schedule and Planning Obligations Supplementary Planning Document Consultation – September 2022

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action. Rugby Borough Council declared a climate emergency in 2019, in doing so committed to:

- To move the Council's operations towards Carbon Neutrality by 2030.
- To establish action to tackle climate change as a key driver of all decision-making.
- To provide community leadership in reducing the impact of Climate Change.
- To take action to mitigate the impact of climate change on a Borough wide basis and beyond, through adaptation.

The Council's Corporate Strategy (2021-24) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes carbon emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to the Deputy Executive Director.

If you require help, advice and support to complete the forms, please contact Dan Green, Deputy Executive Director.

SECTION 1: OVERVIEW

Portfolio and Service Area	Growth and Investment
Policy/Service/Change being assessed	Rugby Town Centre Regeneration Strategy
Is this a new or existing Policy/Service/Change?	This is a new strategy which sets out the vision (including interventions) for the regeneration of the town centre.
If existing policy/service please state date of last assessment	None.
Ward Specific Impacts	Borough-wide.
Summary of assessment Briefly summarise the policy/service/change and potential impacts.	<p>The Rugby Town Centre Regeneration Strategy focuses on Rugby Town Centre, including the Town Hall and Rugby School and the key movement corridors of Corporation Street and North Street. The strategy seeks to link key sites and spaces within the town. It provides a clear framework for regeneration and development by setting parameters for development, steering investment priorities and providing the basis for landowners and investors to progress their plans.</p> <p>As the document is currently a high-level strategy it is envisaged that there will be no negative impacts in relation to the assessment in stage 2 of the document. Positive impacts are identified in relation to sustainable transport/travel and biodiversity and habitats. These positive impacts are envisaged to be delivered in the next 2 years.</p>
Completed By	Ella Casey (Senior Major Projects Officer) – Major Projects and Economic Development
Authorised By	Helen Nightingale (Major Projects and Economic Development Manager)
Date of Assessment	17 November 2022

SECTION 2: IMPACT ASSESSMENT

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Energy usage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Fleet usage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Sustainable Transport/Travel (customers and staff)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The strategy looks to improve key routes and improve pedestrian and cyclist routes within the town centre. It also seeks to Improve bus connectivity, accessibility and reliability.	N/A	N/A	Short term – up to 2 years
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Community leadership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Biodiversity and habitats	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The public realm interventions look to introduce tree planting and additional community spaces into the town centre	N/A	N/A	Short term – up to 2 years
Adaptation/Mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Impact on other providers/partners	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 3: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	Not required for this document – additional documents will have their own assessment.
Key points to be considered through review	N/A
Person responsible for review	N/A
Authorised by	Helen Nightingale (Major Projects & Economic Development Manager)

Appendix 3 - EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published online.
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Minakshee Patel
Corporate Equality & Diversity Advisor
minakshee.patel@rugby.gov.uk
Tel: 01788 533509

Equality Impact Assessment

Service Area	Growth & Investment – Major Projects and Economic Development
Policy/Service being assessed	Rugby Town Centre Regeneration Strategy
Is this is a new or existing policy/service? If existing policy/service please state date of last assessment	These are new documents which relate to the regeneration of the Town Centre
EqlA Review team – List of members	Helen Nightingale – Major Projects and Economic Development Manager Ella Casey – Senior Major Projects Officer
Date of this assessment	17 th November 2022
Signature of responsible officer (to be signed after the EqlA has been completed)	Helen Nightingale

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Advisor.

If you require help, advice and support to complete the forms, please contact Minakshee Patel, Corporate Equality & Diversity Advisor via email: minakshee.patel@rugby.gov.uk or 01788 533509

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Scoping and Defining</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	This document is a corporate vision for the town centre which sets out a strategy for the regeneration of the town centre.
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	It primarily fits in with priorities on: <ul style="list-style-type: none"> • Rugby Borough Council is a responsible, effective and efficient organisation. • Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. • Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. • Residents live healthy, independent lives, with the most
(3) What are the expected outcomes you are hoping to achieve?	This strategy sets out the vision for the Town Centre which will allow development in certain areas to be guided. This document will enable further detailed work to be commissioned and provide a basis for funding bids.
(4) Does or will the policy or decision affect: <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	Not at this early stage – when further decisions are made surrounding sites within the strategy this would be reassessed.
<u>Stage 2 - Information Gathering</u>	
(1) What does the information tell you about those groups identified?	As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).
(1) What does the information tell you about those groups identified?	Various consultations have been undertaken for the strategy with the public, key stakeholders and businesses within the town.

<p>(2) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement? If yes, what were their views and how have their views influenced your decision?</p>	<p>Three key stages of engagement have been undertaken. Stage 1 – Jan-Feb 2021 – one to one stakeholder meetings (including local representatives, major businesses and landowners). Stage 2 – March 2021 – two week public consultation – survey to establish local priorities (over 1,200 responses received). Stage 3 – Sept-Nov 2021 – 6 week public consultation exercise including a website production, an online survey, a stakeholder workshop and a business drop in (635 responses received). In addition a business breakfast (Apr 2022) was held to further engage businesses in the process.</p>		
<p>(3) If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>N/A – consultations undertaken</p>		
<p><u>Stage 3 – Analysis of impact</u></p>			
<p><u>(1) Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination? If yes, identify the groups and how they are affected.</p>	<p>RACE No</p>	<p>DISABILITY Yes, by advocating improvements to accessibility to the public realm and promoting accessibility to sustainable methods of travel.</p>	<p>GENDER No</p>
	<p>MARRIAGE/CIVIL PARTNERSHIP No</p>	<p>AGE No</p>	<p>GENDER REASSIGNMENT No</p>
	<p>RELIGION/BELIEF No</p>	<p>PREGNANCY MATERNITY No</p>	<p>SEXUAL ORIENTATION No</p>

<p><u>(2) Cross cutting themes</u></p> <p>(a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?</p> <p>(b) Are your proposals likely to impact on a carer who looks after older people or people with disabilities? If yes, please explain how?</p>	<p>This first stage sets out a vision for the Town Centre and seeks to improve pedestrian and cycle provision and linkages within the town centre. The document could help the council to secure funding to address social inequalities.</p> <p>Not directly - active travel and sustainable transport is a theme within the identified movement and public realm interventions. These interventions seek to improve key routes, links and spaces for pedestrians and cyclists.</p>
<p>(3) If there is an adverse impact, can this be justified?</p>	<p>N/A</p>
<p>(4) What actions are going to be taken to reduce or eliminate negative or adverse impact? (this should form part of your action plan under Stage 4.)</p>	<p>For each development project within the strategy that requires planning permission further consultation will be carried out within the planning process.</p>
<p>(5) How does the strategy/service/policy contribute to the promotion of equality? If not what can be done?</p>	<p>Not at this initial stage (see 2a), further development of initial strategy will seek to promote this.</p>
<p>(6) How does the strategy/service/policy promote good relations between groups? If not what can be done?</p>	<p>Engagement has been undertaken with various groups and the responses have been considered and intertwined into the strategy. If funding is eventually forthcoming the authority can use revenue to promote good relations.</p>
<p>(7) Are there any obvious barriers to accessing the service? If yes how can they be overcome?</p>	<p>N/A</p>

<u>Stage 4 – Action Planning, Review & Monitoring</u>																														
<p>If No Further Action is required then go to – Review & Monitoring</p> <p>(1) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>No further action is required.</p> <p>EqIA Action Plan</p> <table border="1" data-bbox="891 459 2132 692"> <thead> <tr> <th data-bbox="891 459 1133 536">Action</th> <th data-bbox="1133 459 1377 536">Lead Officer</th> <th data-bbox="1377 459 1621 536">Date for completion</th> <th data-bbox="1621 459 1865 536">Resource requirements</th> <th data-bbox="1865 459 2132 536">Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="891 536 1133 576"></td> <td data-bbox="1133 536 1377 576"></td> <td data-bbox="1377 536 1621 576"></td> <td data-bbox="1621 536 1865 576"></td> <td data-bbox="1865 536 2132 576"></td> </tr> <tr> <td data-bbox="891 576 1133 616"></td> <td data-bbox="1133 576 1377 616"></td> <td data-bbox="1377 576 1621 616"></td> <td data-bbox="1621 576 1865 616"></td> <td data-bbox="1865 576 2132 616"></td> </tr> <tr> <td data-bbox="891 616 1133 655"></td> <td data-bbox="1133 616 1377 655"></td> <td data-bbox="1377 616 1621 655"></td> <td data-bbox="1621 616 1865 655"></td> <td data-bbox="1865 616 2132 655"></td> </tr> <tr> <td data-bbox="891 655 1133 692"></td> <td data-bbox="1133 655 1377 692"></td> <td data-bbox="1377 655 1621 692"></td> <td data-bbox="1621 655 1865 692"></td> <td data-bbox="1865 655 2132 692"></td> </tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(2) Review and Monitoring State how and when you will monitor policy and Action Plan</p>	<p>Further EqIA's will be undertaken for each additional study which is completed following the adoption of this strategy.</p>																													

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on 17th November 2022 and will be reviewed on 30th January 2025.’

AGENDA MANAGEMENT SHEET

Report Title: Local Plan Review

Name of Committee: Cabinet

Date of Meeting: 5 December 2022

Report Director: Chief Officer – Growth and Investment

Portfolio: Growth and Investment

Ward Relevance: All wards

Prior Consultation: No

Contact Officer: Peter Heath, Principal Planner, Development Strategy 01788 533735 or peter.heath@rugby.gov.uk

Public or Private: Public

Report Subject to Call-In: No

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C)
 Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E)
 Residents live healthy, independent lives, with the most vulnerable protected. (HC)
 Rugby Borough Council is a responsible, effective and efficient organisation. (O)
[Corporate Strategy 2021-2024](#)
 This report does not specifically relate to any Council priorities.

Summary: IT BE RECOMMENDED TO COUNCIL THAT -

1. a full review of the Local Plan be undertaken;

2. the amended Local Development Scheme (LDS), attached as Appendix 1, be approved;
3. delegated authority be given to the Chief Officer for Growth and Investment to make minor grammatical and presentational amendments as necessary to the Local Development Scheme before publication; and
4. further reports be presented after further analysis is undertaken outlining the funding required and the timeline to deliver the review

Financial Implications:

As identified in section 6 of the report, adopting a new Local Plan will require significant expenditure by the authority of c.£500,000 over the next three to four financial years and further reports will be presented to Cabinet to release reserves to finance the work.

Risk Management/Health and Safety Implications:

Undertaking public consultation at each stage is a statutory requirement. If each consultation phase stage is not undertaken, the review of the local plan cannot be progressed towards adoption. If the plan is not reviewed there is a danger that the authority will not be able to use its policies to guide new development when it comes forward.

Environmental Implications:

Adopting a new local plan will have significant positive environmental benefits for the borough. It represents an opportunity to update and strengthen our policies on a wide variety of issues such as addressing climate change, minimising resource use, increasing sustainable transport. It represents an opportunity to ensure site allocations are located in the most sustainable locations.

Legal Implications:

Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 provides that local planning authorities must review their plans at least every five years to determine if they require updating. Paragraph 33 of the National Planning Policy Framework sets out what the review should cover and when earlier review might be necessary and says that following the review, plans should be updated as necessary.

Equality and Diversity:

An Equality Impact Assessment has been undertaken and is provided as Appendix 3 to this report. A new local plan represents an opportunity for more housing, including affordable housing, for a wide diversity of residents. It also provides an opportunity to provide new jobs and training opportunities.

Options:

Option 1 –Approve a full review of the local plan and approve the necessary funding.

Option 2 – Approves the LDS with a change to allow only a partial review of the local plan.

Option 3 –Refuse to amend the LDS and do not review the Local Plan

Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT -

1. a full review of the Local Plan be undertaken;
2. the amended Local Development Scheme (LDS), attached as Appendix 1, be approved;
3. delegated authority be given to the Chief Officer for Growth and Investment to make minor grammatical and presentational amendments as necessary to the Local Development Scheme before publication; and
4. further reports be presented after further analysis is undertaken outlining the funding required and the timeline to deliver the review

Reasons for Recommendation:

Without an up-to-date Local Plan, there is a significant risk that the Council's ability, as the Local Planning Authority to influence and control development will be diminished through the application of the 'presumption in favour of sustainable development'. This would result in a requirement on the Council for new development to be granted planning permission unless it conflicts with the National Planning Policy Framework or the adverse effects would significantly and demonstrably outweigh the benefits. This application of this so-called 'tilted balance' would reduce the ability of the Council to apply its own

planning policies with the potential consequence of developments coming forward that the Council would have otherwise considered unacceptable. In these circumstances it is also likely that the Council would lose more planning appeals. The longer the gap between the current plan 'expiring' in June 2024 and the new plan being adopted the greater the risk.

Cabinet - 5 December 2022

Local Plan Review

Public Report of the Chief Officer – Growth and Infrastructure

Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT -

1. a full review of the Local Plan be undertaken;
2. the amended Local Development Scheme (LDS), attached as Appendix 1, be approved;
3. delegated authority be given to the Chief Officer for Growth and Investment to make minor grammatical and presentational amendments as necessary to the Local Development Scheme before publication; and
4. further reports be presented after further analysis is undertaken outlining the funding required and the timeline to deliver the review.

1. INTRODUCTION

- 1.1. The Council has a statutory duty to review its Local Plan at least every five years. The Local Plan was adopted on 6 June 2019 (work on that plan began in 2011) therefore a review needs to be undertaken by June 2024. The absence of an up-to-date Local Plan has consequences for the weight given to the Council's planning policies in future planning decisions.
- 1.2. The Council also has a duty to prepare and maintain an up-to-date Local Development Scheme (LDS). The LDS is a project plan for the production of the Local Plan and other development plan documents. It sets out the documents that the Council intends to produce and the timescale for their production. In order to be considered legally compliant in accordance with the Planning and Compulsory Purchase Act 2004, the Council's Local Plan documents should be in general conformity with the LDS. This means they should be listed in the LDS and prepared in accordance with the timescales set out in the document. The current LDS was prepared in June 2022 and now requires updating as the June version did not include a timetable for a local plan review.

2. PURPOSE OF REPORT

- 2.1 To seek approval for a full review of the local plan to commence and that the necessary funding is drawn down from reserves to fund the review.

- 2.2 To seek approval to adopt a revised Local Development Scheme that sets out a potential timeline for the adoption of the review of the local plan.

3. BACKGROUND

- 3.1 The strategic policies in the Local Plan were largely developed in 2015/16 since which time there has been significant changes in terms of economic, environmental and social impacts that need to be addressed.
- 3.2 In 2021 the Council adopted its Corporate Strategy with 4 priority outcomes Climate, Economy, Health and Communities and Organisation. The Local Plan is a key document to deliver all of these aspirations.
- 3.3 The current Local Plan also does not fully reflect the current priorities set out in Council initiatives such as the emerging Town Centre Regeneration Strategy, and the Climate Change Strategy. A review of the Local Plan will provide an opportunity to bring our planning policies in line with these priorities and assist with their implementation.
- 3.4 Since the Local Plan was adopted in 2019, new opportunities and challenges for the borough's built and natural environments have emerged with implications for planning and regeneration in Rugby that a review of the Local Plan could address. These include:
- a growing and changing population;
 - increasing housing pressure;
 - the declaration of a climate change emergency by the Council;
 - the continuing need to secure improved sustainable transport infrastructure;
 - the need to secure the provision of early years and school places, health care and other key community facilities required to support a growing and changing population;
 - addressing the economic challenges arising from the COVID-19 pandemic leading to increased demand for B8 warehousing but also including the impact on the town centre; and
 - responding to the continuous pressure on Rugby's Green Belt.
- 3.5 Without an up-to-date Local Plan, there is a significant risk that the Council's ability as the local planning authority to influence and control development will be diminished through the application of the 'presumption in favour of sustainable development'. This would result in a requirement on the Council for new development to be granted planning permission unless it conflicts with the National Planning Policy Framework or the adverse effects would significantly and demonstrably outweigh the benefits. This application of this so-called 'tilted balance' would reduce the ability of the Council to apply its own planning policies to the determination of planning applications, with the potential consequence of developments coming forward that the Council would have otherwise considered unacceptable. In these circumstances it is also likely that the Council would lose more planning appeals. The longer the gap between the current plan 'expiring' in June 2024 and the new plan being adopted the greater the risk.

- 3.6 The Environment Act requires developers to secure biodiversity net gain for all new developments and for Councils to prepare local nature recovery strategies. The latter are expected to inform and support plan-making and ensure that development proposals meet biodiversity priorities.
- 3.7 The long-term consequences of the Covid-19 pandemic are still being understood, but it is most likely that the deliverability of the retail and office floorspace targets set out in the Plan will be affected, if not only by accelerating the changes that were already taking place to working and shopping practices before the pandemic. Recovery could take a number of years and therefore challenge the delivery of the existing Plan. As well as this, changes to the Use Classes Order and the extension of permitted development rights have undermined existing policies in relation to the town centre and the protection of (formerly B1 uses) industrial uses. The approach to the town centre, employment land and key growth areas will need to be re-evaluated and updated as a result.
- 3.8 Whilst there are many positives as to why a review should be undertaken there are also some risks. There has been discussion at Central Government level about significant changes to the legislative and policy context and the potential for substantial reforms. Whilst the prospect of these further changes could be a potential reason to delay such a review, the Government's Chief Planner stated in her letter to Chief Planning Officers in October 2020 that the 'uncertainty' should not stop the progression of local plans given the importance of a strong planning framework in facilitating the recovery from the impacts of the pandemic. It is therefore considered that there remain significant benefits to the borough in progressing a review of the Local Plan.

4. TYPE OF REVIEW

- 4.1. Under the regulations the Council has the option of either a partial or a full review. Officers are recommending that a full review is undertaken. Until the current legislation changes, any plan review (partial or full) requires a viability review and a series of environmental assessments. So any subsequent review after a partial review would, in effect, increase the costs of updating the plan as these assessments would be required again. Given the need to address climate change issues and assist with the regeneration of the town centre there is little of the adopted plan that does not require an update. This is especially true for future housing and employment needs that have recently been identified.
- 4.2. A study funded by all Warwickshire authorities and Coventry City Council assessed the need for both Housing and Economic Development (HEDNA) across the sub-region and was undertaken by external consultants. The levels of need identified for both employment and housing by this study represent a level of need that would require a review of the plan as existing allocations will not meet this anticipated level of need. The HEDNA study is attached as Appendix 2.
- 4.3. In relation to employment Table A below shows forecast need for employment land in hectares for Rugby for the period 2021-2050. There will also need to be agreement in the future about how the land for warehousing is distributed between the six authorities.

- 4.4 The adopted Local Plan has a figure of 110 hectares for employment need in Rugby as well 98 hectares for meeting Coventry’s unmet need. The HEDNA indicates that up to 2041 approximately 156 of hectares of land will be required as a minimum for B1 and B2 uses. The final figure for B8 is not yet determined as the figure in Table A is based on the sub regional requirement which will need to be divided up between Warwickshire Authorities and Coventry City Council. The HEDNA is clearly indicating a higher level of need when compared to the adopted plan. This higher demand is driven by Rugby’s location in relation to the strategic road network, and increased demand for home deliveries for internet shopping and post-Brexit industrial re-organisation.

Table A - Hectares of Employment Land Required for Rugby

Year	Office (B1)	Industry (B2)	Total	Warehousing (B8)
2041	5.2	150.5	155.7	A share of 606
2050	6.5	218.2	224.7	A share of 709

- 4.5 In relation to housing a standard method for calculating housing need was introduced by central Government in 2017 and revised in December 2020. The appointed consultants have produced one set of dwelling figures based on the Government’s standard methodology and a separate figure based on a revised methodology to take account of other factors that impact on population projections (see Table B below). For a 20-year plan period this would equate to 10,320 dwellings for Rugby on the standard method or 14,700 dwellings on the revised method. The adopted plan has a figure of 12,400 dwellings, which was a combination of 9,600 dwellings to deal with Rugby’s need and a contribution of 2,800 dwellings to meet need in Coventry that it was unable to meet. Whether looking at the figure generated by the standard method or the revised method the authority cannot meet either without making additional site allocations.

Table B - Dwelling Figures for Rugby Standard Method v Revised Method

Per annum	Total for sub-region	Of which Coventry Total	Rugby Total dwellings per annum
Standard Method	5554	3188	516
Revised Method	4906	1964	735

- 4.6 On first appearances it would appear that the standard method figure would be lower for Rugby. However, on the standard method the figure for Coventry is much higher than on the revised method and Coventry are not yet able to advise on how much of this figure they can accommodate (3188 pa would equal 63,670 for a 20-year plan) and may need the other authorities in Warwickshire to help them meet their need. At the time of writing Rugby is still subject to the duty to cooperate with neighbouring authorities. So there may be an expectation that Rugby, along with the other authorities in the sub-region, will take a share of Coventry’s need.

- 4.6 For the adopted Plan Rugby took 15% of Coventry's need. If the standard figure is used across the sub-region and Rugby again took 15% of Coventry's need then the figure for Rugby would rise from 516 dwellings per annum to 994 (516 + 15% of 3188). For a 20-year period that would equate to 19,880 dwellings.
- 4.7 The revised need for both employment and housing results in more sites needing to be allocated to meet this need. This can only be achieved through a full review of the plan. If Council agrees to a full review of the Local Plan the first stage of reviewing will be the production of an Issues & Options paper. That paper can set out the merits of the standard method v revised method dwelling figure and members can then decide informed by the results of that public consultation exercise. There is therefore no requirement for Council to decide on which method to use in calculating housing numbers at this stage, this decision will be informed once the review process has commenced.

5. REVIEW PROCESS

- 5.1 The National Planning Policy Framework requires that the Local Plan should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the borough. This will also allow the Council to take the most appropriate approach based on local circumstances in the context of national and regional planning requirements.
- 5.2 Given the extensive period of time that has passed since the evidence was developed in support of the current Local Plan (largely in the 2013-2017 period) and the significant economic, social and environmental changes that have taken place in recent years, officers will need to prepare a suite of new evidence base documents to inform the review.
- 5.3 The work identified for external commissioning includes a Green Belt review, a strategic transport assessment, open spaces assessment, critical infrastructure (water, power), assessment of sites, a full plan viability assessment and the preparation of a Strategic Infrastructure Delivery Plan.
- 5.4 Alongside the above, and in line with Planning Regulations, additional technical assessments will have to be prepared to inform and support the Local Plan including:
- Sustainability Appraisal
 - Habitats Regulation Assessment
 - Equalities Impact Assessment
 - Health Impact Assessment
- 5.5 The proposed LDS is attached at Appendix 1 of this report. The key milestones for the review of the Local Plan are as follows:

Table C - Main Milestones for the Local Plan Review

Stage	Dates
Issues & Options	June-July 2023
Preferred Options	June-July 2024
Publication Version	January-February 2024
Submission to PINS	June 2025
Examination in Public	September-October 2025
Inspector's Report	December 2025
Adoption	March 2026

6. FINANCE

- 6.1 Paragraph 5.3 sets out a number of studies that will be required to underpin the review of the plan. These are major pieces of work but will need to be supported by other studies. The table below sets out an indicative timeline for when studies will be undertaken and an estimate of possible costs.

Table D – Indicative Costs and Timeline for background studies

	2022/23 £	2023/24 £	2024/25 £
Sustainability Appraisals	5,000	30,000	15,000
Green Belt review	25,000	25,000	
Green infrastructure study	5,000		
Water cycle study	7,000		
Flood risk assessment	5,000		
Strategic Transport Assessment		50,000	
Viability Testing		20,000	
Heritage Assets Review		25,000	
Critical Infrastructure		20,000	
Assessment of sites submitted		30,000	
Examination Costs			130,000
Panel Secretary			25,000
Consultancy Support			75,000
Total	47,000	200,000	245,000

- 6.2 The cost listed in Table D are significant which is one of the reasons why it is recommended that a full review is conducted rather than a partial review. As one off costs these will not be added to the base budget, however further reports will be presented to cabinet to request the use of reserves once there is more clarity on the cost and the timing.
- 6.3 As well as the cost of undertaking the review, there will also be benefits to the Council from future planning applications and this will be taken into consideration when requesting the release of reserves.

7. EQUALITY IMPACT ASSESSMENT

- 7.1 An Equality Impact Assessment (EqIA) has been undertaken and is attached as Appendix 3 to this report. At this early stage before any policies have been drafted or sites allocated it is not possible to accurately judge the impact of a new plan on equalities.

8. SUSTAINABILITY APPRAISAL

- 8.1 As the legislation currently stands each stage of a local plan review must be accompanied by a sustainability appraisal/strategic environmental assessment and a Habitats Regulation Assessment. If a review of the local plan is commenced all these appraisals will be required.

9. CONCLUSION AND RECOMMENDATION

- 9.1 If the Council does not have an up-to-date Local Plan, there is a significant risk that the Council's ability, as the Local Planning Authority to influence and control development will be diminished through the application of the 'presumption in favour of sustainable development'. This would result in a requirement on the Council for new development to be granted planning permission unless it conflicts with the National Planning Policy Framework or the adverse effects would significantly and demonstrably outweigh the benefits. This application of this so-called 'tilted balance' would reduce the ability of the Council to apply its own planning policies with the potential consequence of developments coming forward that the Council would have otherwise considered unacceptable. In these circumstances it is also likely that the Council would lose more planning appeals. The longer the gap between the current plan 'expiring' in June 2024 and the new plan being adopted the greater the risk.
- 9.2 The Council would also not be able to fully deliver and realise its aspirations for the regeneration of Town Centre and Climate Change. The Council would also not be able to deliver sufficient jobs across a diverse range of sectors, to meet the needs of its residents in terms of employment but also in terms of attracting inward investment, to drive growth in the Borough. The Council would also not be able to provide sufficient housing and affordable housing of different sizes and tenures to ensure that residents across the Borough have good quality housing.
- 9.3 It is therefore considered that Council should approve the commencement of a full review of the Local Plan.

Name of Meeting: Cabinet
Date of Meeting: 5 December 2022
Subject Matter: Local Plan Review

Originating Department: Growth and Investment

DO ANY BACKGROUND PAPERS APPLY **YES**

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
1	Rugby Borough Local Plan 2011-2031, adopted June 2019 https://www.rugby.gov.uk/downloads/file/2319/local_plan_2011-31
2	Local Development Scheme, adopted June 2022 https://www.rugby.gov.uk/downloads/download/101/local_development_scheme
3	
4	
5	
6	
7	
8	

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A



Rugby Borough Council

Local Development Scheme

December 2022

Appendix 1

CONTENTS

Section

1. Introduction
2. The Previous LDS
3. Development Plan Documents
4. Supplementary Planning Documents
5. Monitoring and Review
6. Contact Details

Appendix 1

1.0 INTRODUCTION

- 1.1 The Council has to prepare a Local Development Scheme (LDS) which is a project plan which sets out which documents are going to be produced, over what time period, that collectively make up the Development Plan. The LDS helps local communities and interested parties keep track of progress and is a legal requirement. It has to be published on the Council's website and be reviewed regularly.
- 1.2 The main Development Plan document for this Council is the Local Plan which was adopted on the 4 June 2019 which sets the overall development strategy for Rugby until 2031. Since the last LDS was published several supplementary planning documents have since been approved.
- 1.3 This LDS runs until December 2027 to cover the period where the Council expects to deliver a Local Plan review and a Gypsy and Travellers Development Plan Document and the listed Supplementary Planning Documents.

2.0 THE PREVIOUS LDS

- 2.1 The previous LDS was published in June 2022. It is important that the LDS is updated to reflect changes which have arisen since then.
- 2.2 The Local Plan was adopted on 4 June 2019. The South West Rugby Masterplan Supplementary Planning Document was adopted by Full Council on 17 June 2021. The Housing Needs Supplementary Planning Document and the Air Quality Supplementary Planning Document were adopted on 20 July 2021.

3.0 DEVELOPMENT PLAN DOCUMENTS

- 3.1 Development Plan Documents (DPDs) are defined in the Local Plan Regulations 2012 (as amended) and are used to guide development proposals when planning permission is required. They regulate the use of land in the public interest. They contain policies on various matters designed to mitigate the impact of developments. Their preparation has to follow procedures set out legally, and have to be underpinned by robust evidence, which is tested at an Examination in Public run by a planning Inspector who is independent of the Council. Only when found 'sound' by the Inspector can they be adopted.
- 3.2 It is a legal requirement for any DPD to be subject to a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA). The SA of the DPD is a statutory requirement of the Planning and Compulsory Purchase Act 2004. Strategic Environmental Assessment is also a statutory assessment process, required by the

Appendix 1

SEA Regulations. These two requirements can be addressed through a joint process and reported in a single SA Report.

- 3.3 There are two DPDs the Council intend to produce. A review of the Local Plan and a Gypsy & Travellers Site Allocations DPD. Work has already commenced on the Gypsy & Travellers Site Allocations DPD.
- 3.4 The purpose of the DPD is to set out site specific policies to meet the Gypsy and Traveller accommodation needs contained in Policy DS2 of the Rugby Borough Local Plan 2011-2031 (adopted June 2019) as updated by the latest Gypsy and Traveller Accommodation Assessment for Rugby Borough. It is a legal requirement for the DPD to be subject to a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA). These two requirements will be addressed through a joint SA/ SEA process for this DPD.
- 3.5 A timetable for a review of the Local Plan is set out below.

Appendix 1

Timetable for Gypsy and Traveller Development Plan Document

	2021			2022						2023						2024							
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
Commencement																							
Evidence Gathering - GTAA Update																							
Evidence Gathering & prepare Issues & Options																							
Sustainability Appraisal Scoping Report & SA of Issues & Options																							
Purdah																							
Issues & Options - Report to Cabinet																							
Issues & Options - Consultation & Call for Sites																							
Issues & Options - Analyse responses																							
Report Issues & Options responses to Cabinet & agree next steps																							
Prepare Preferred Options - Site assessment & SA of options																							
Purdah																							
Preferred Options - Report to Cabinet																							
Preferred Options - Consultation																							
Preferred Options - Analyse responses & prepare Pre-Submission Draft																							
Report Preferred Options results to Cabinet & approve Reg 19 Pre-Submission Draft Consultation																							
Reg 19 Pre-Submission Draft - Consultation																							
Reg 19 Pre-submission Draft - Responses processing/analysis																							
Report Reg 19 Results to Cabinet & approve Submission																							
Submission to the Secretary of State																							
Purdah																							
Public Examination																							
Inspectors Report																							
Report to Cabinet																							
Report to Council for Adoption																							

Appendix 1

Timetable for the Local Plan Review

	2022			2023									2024									2025 - 2026																																		
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar														
Commencement																																																								
Prepare Issues & Options																																																								
Purdah																																																								
Issues & Options - Report to Cabinet																																																								
Issues & Options - Consultation & Call for Sites																																																								
Issues & Options - Analyse responses																																																								
Report Issues & Options responses to Cabinet & agree next steps																																																								
Prepare Preferred Options - Site assessment & SA of options																																																								
Purdah																																																								
Preferred Options - Report to Cabinet																																																								
Preferred Options - Consultation																																																								
Preferred Options - Analyse responses & prepare Pre-Submission Draft																																																								
Report Preferred Options results to Cabinet & approve Reg 19 Pre-Submission Draft Consultation																																																								
Reg 19 Pre-Submission Draft - Consultation																																																								
Purdah																																																								
Reg 19 Pre-submission Draft - Responses processing/analysis																																																								
Report Reg 19 Results to Cabinet & approve Submission																																																								
Submission to the Secretary of State																																																								
Public Examination																																																								
Inspectors Report																																																								
Report to Cabinet																																																								
Report to Council for Adoption																																																								

Appendix 1

4. SUPPLEMENTARY PLANNING DOCUMENTS

4.1 Supplementary Planning Documents (SPDs) add detail to the policies of the Local Plan but do not have development plan status. They cannot introduce new policies. They are a material consideration in the determination of planning applications. They should be prepared in consultation with the public, businesses and all other interested parties and the views expressed should be taken into account before the document is finalised. SPDs may be Borough wide or area specific and take the form of design guides, development briefs or supplement specific policies in the DPDs. The following SPDs will be produced:

- Planning Obligations SPD
- Climate Change and Sustainable Design and Construction SPD

4.2 The production of the Planning Obligations SPD is dependent upon whether or not the Council adopts the Community Infrastructure Levy (CIL). The authority has published a CIL charging schedule for consultation. Assuming the CIL is progressed towards adoption, the timetable for the production of the Planning Obligations SPD would be as follows as it would evolve alongside the CIL.

Appendix 1

Timetable for Planning Obligations Supplementary Planning Document

	2022			2023														
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec			
Consultation	Yellow	Yellow																
CIL Examination				Red														
Examiners Report					Green													
Report to Cabinet								Blue										
Report to Council for Adoption									Dark Blue									

Appendix 1

Timetable for Climate Change and Sustainable Design and Construction Supplementary Planning Document

	2021			2022											2023			
	Oc t	No v	De c	Ja n	Fe b	Ma r	Ap r	Ma y	Ju n	Ju l	Au g	Se p	Oc t	No v	De c	Ja n	Fe b	Ma r
Evidence Gathering																		
Report to Cabinet																		
Consultation																		
Consider Responses																		
Report to Cabinet																		
Report to Council for Adoption																		

Appendix 1

5.0 MONITORING AND REVIEW

- 5.1 Local Planning Authorities are required to produce an authority monitoring report to assess the implementation of the LDS and the extent to which policies in LDDs are being achieved. The authority monitoring report must be based upon the period 1st April to 31st March.
- 5.2 The report will assess whether the Council has met these targets and milestones, is on target to meet them, is falling behind schedule or will not meet them. If the Council is falling behind schedule or has failed to meet a target or milestone, the report will set out the reasons for this and identify what steps are to be taken to address any problems. The LDS may need to be updated as a result of this.
- 5.3 To comply with the legislation all documents will be produced to accord with any relevant data standards required by the government.

6.0 CONTACT DETAILS

- 10.1 For more information about any of the issues raised in this Local Development Scheme please contact:-

Development Strategy Team
Growth and Investment
Town Hall
Evreux Way
Rugby
CV21 2RR

Tel: 01788 533828

Email: Localplan@rugby.gov.uk

- 10.2 This document together with all other Local Development Documents produced by Rugby Borough Council will be made available on the Council's web site: www.rugby.gov.uk



OCTOBER
2022

Coventry & Warwickshire Housing & Economic Development Needs Assessment (HEDNA)

Final Report

Iceni Projects Limited on behalf of Coventry &
Warwickshire Local Authorities

October 2022

Iceni Projects

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ICENI PROJECTS LIMITED
ON BEHALF OF COVENTRY
& WARWICKSHIRE LOCAL
AUTHORITIES

Coventry & Warwickshire Housing &
Economic Development Needs
Assessment (HEDNA)
FINAL REPORT

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1. INTRODUCTION

1.1 The local planning authorities in Coventry and Warwickshire¹ has a history of working together to address strategic planning matters and have commissioned this Housing and Economic Development Needs Assessment (HEDNA) to inform the preparation and review of local plans within the sub-region.

What is the HEDNA?

1.2 The HEDNA is intended to provide a joint and integrated assessment of the need for housing, economic growth potential and employment land. It considers the scale of overall housing need, the need for different types of homes, dynamics within different sectors of the housing market and the specific housing needs of different groups within the population. It considers economic dynamics and growth potential and provides an integrated evidence base regarding the need for employment land and premises to 2041 and 2050.

1.3 The HEDNA provides an assessment of need and is intended to inform part of the evidence base to inform the development of local plans. It will inform consideration of the scale and distribution of development within the sub-region, particularly post 2031, which is to be address through a new Memorandum of Understanding between the Coventry & Warwickshire (C&W) authorities.

1.4 The HEDNA has been prepared by a consultancy team led by the Economics Team at consultancy Icen Projects, supported by Cambridge Econometrics (in respect of economic forecasts), Holt Commercial (in respect of commercial property market dynamics), MDS Transmodal (in respect of warehousing and logistics needs) and Justin Gardner Consulting (JGC) (on demographics, affordable housing and specialist housing needs).

Study Requirements

1.5 Key requirements of the brief for the Study are:

- Reviewing the Housing Market Area (HMA) and Functional Economic Market Area (FEMA) geographies and considering dynamics that cut across county boundaries including relevant Duty to Cooperate issues;

¹ Coventry City Council, Rugby Borough Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Stratford-on-Avon District Council and Warwick District Council

-
- Considering overall housing need within the Study area, having regard to the standard method, interrogation of demographic trends and other relevant considerations including economic growth potential;
 - Breaking down the overall housing need by type, tenure and size and providing an evidence base regarding the mix of housing needed. The HEDNA includes an updated assessment of affordable housing need and consideration of the need and policies for First Homes;
 - Considering the housing needs of specific household groups including students, families, older people, and others with specific housing needs; as well as appraising dynamics in particular market segments including the self- and custom-build housing and build-to-rent;
 - Reviewing economic dynamics and consideration of economic growth potential, including the potential of different economic sectors;
 - Appraising commercial property market dynamics and trends in the delivery and loss of employment of different types, including through permitted development;
 - Assessment of future needs for employment land to 2041, including office and industrial floorspace, to inform plan preparation.

1.6 Updated evidence is needed to take account of changes in economic and housing market dynamics, national policy changes including the revised NPPF and introduction of the standard method for calculating housing need, and to an provide up-to-date evidence base which can inform the progression or review of local plans, duty to cooperate conservations, and development management decisions on individual planning applications.

Housing and Functional Economic Market Areas

1.7 Previous research has defined Coventry and Warwickshire as a functional Housing Market Area² and Functional Economic Market Area³ taking account of the functional relationships which exist across the sub-region. Icenl has sought to review whether these geographies hold true having regarding to the latest data. The detailed analysis is set out in **Appendix A1**.

1.8 The evidence shows a strong set of commuting and migration relationships between the authorities in Coventry and Warwickshire, with 2011 Census data showing 71% of internal migration moves where contained within the sub-region, rising to 86% if long distance flows are excluded; with 81% of residents both living and working within the area. Some distinction can be drawn between the characteristics in Coventry and the northern part of the sub-region which tends to have lower house

² Coventry and Warwickshire Joint Strategic Housing Market Assessment, 2013

³ Warwickshire County Council 2010; Coventry Employment Land Review 2015

prices and an economic structure which is more focused towards manufacturing, warehousing and logistics; whereas South Warwickshire has a more serviced-based economy and higher house prices. However Coventry plays an important role as an employment, retail, cultural and service centre for the wider sub-region and there remains notably commuting to between Coventry and the South Warwickshire authorities.

- 1.9 Whilst functional geographies do not in reality precisely fit onto local authority boundaries, Coventry and Warwickshire remains an appropriate ‘best fit’ Housing Market Area (HMA) and Functional Economic Market Area (FEMA). Inevitably functional market areas clearly do not precisely fit to local authority boundaries; and at the borders of any area HMA there are often links with the adjoining areas. Plan making activities should therefore continue to recognise overlaps in North Warwickshire and Stratford-on-Avon with the Birmingham HMA and FEMA; between Rugby and West Northamptonshire; and local links across the A5 with Hinckley and Bosworth.

Report Structure

- 1.10 Initial work on preparing the HEDNA was undertaken in 2021. 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.
- 1.11 The HEDNA report is structured as follows:

Part A: Understanding Dynamics

- Chapter 2: Economic Baseline;
- Chapter 3: Commercial Property Market Dynamics;
- Chapter 4: Housing Market Dynamics;

Part B: Considering Overall Development Needs

- Chapter 5: Demographic Dynamics & Overall Housing Need;
- Chapter 6: Economic Growth Potential;
- Chapter 7: Affordable Housing Need;

Part C: Considering Employment Land Needs

- Chapter 8: Employment Land Needs;

-
- Chapter 9: Strategic B8 Land Use Forecasting;
 - Chapter 10: Drawing Conclusions on Employment Land Needs;

Part D: Mix of Homes Needed

- Chapter 11: Sizes and Types of Homes Needed;
- Chapter 12: Specific Housing Market Segments;

1.12 A final section then sets out conclusions and recommendations. A separate Executive Summary has been prepared.

PART A: UNDERSTANDING DYNAMICS

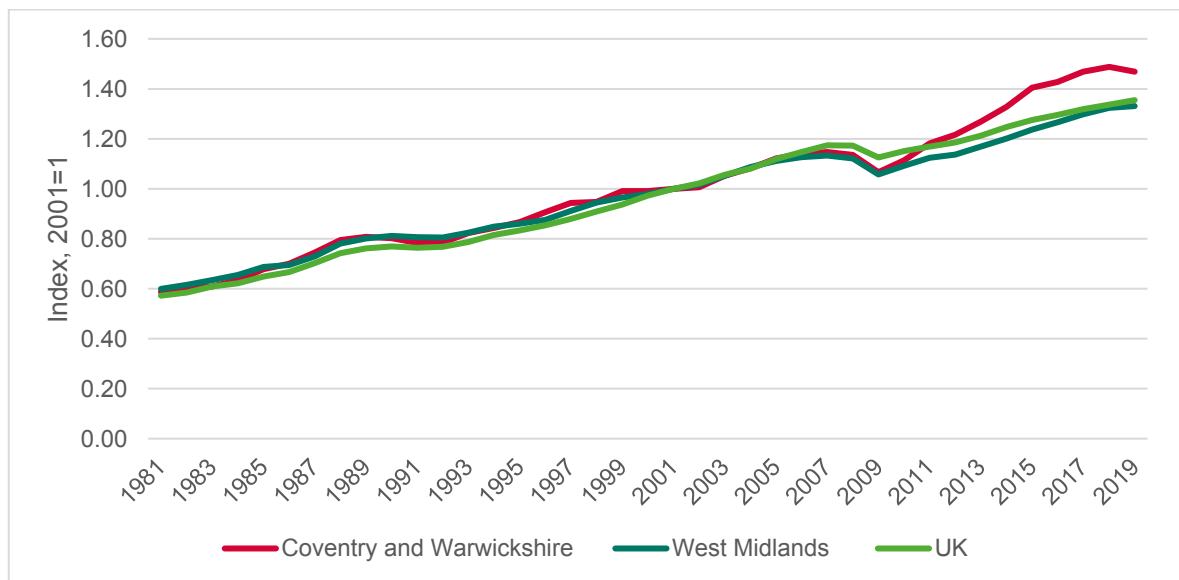
2. ECONOMIC BASELINE

2.1 This section of the report provides a profile of the sub-regional economy and its past performance and considers labour market dynamics. The analysis draws on a comprehensive economic dataset from Cambridge Econometrics Local Economy Forecasting Model (LEFM) dated March 2021. This includes data on employment and GVA, overall and by sector, from 1981-2019.

Economic Size and Structure

2.2 Coventry and Warwickshire is a £26 billion economy, accounting for 19% of West Midlands GVA. As the analysis below shows, growth in GVA has slightly out-performed regional and national trends with growth of 47% achieved between 2001-19 compared to 33% and 35% at a regional and national level. This in particular reflects stronger performance over the period since 2013.

Figure 2.1: Historical GVA Growth



Source: Icen analysis of CE data

2.3 An analysis of the contribution to GVA of different sectors points to the important role of the manufacturing sector, which accounts for 18.2% of GVA; to wholesale, transport and warehousing and postal activities, which account for 10.6% of GVA; and to the education sector which accounts for 6.5% of GVA. Overall the service sector accounts for around 59% of total GVA.

2.4 Over the period since 2001, manufacturing GVA has grown (by 46%, an average of 2.1% pa) with service sector activities similarly driving growth in the sub-regional economy. The sectors which have contributed most strongly to GVA growth are shown below. This includes both sectors associated both with offices and warehousing, together with utilities, construction, health and education.

Table 2.1 Sectors driving growth in GVA, 2001-19

	GVA 2001 £ million	GVA Growth 2001-19 £ million	% Growth	% CAGR
Electricity & gas	457.72	1306.05	285%	7.8%
Agriculture, forestry & fishing	94.255	46.511	49.3%	2.3%
Pharmaceuticals	8.088	21.765	269.1%	7.5%
Motor vehicles	1247.402	1701.660	136.4%	4.9%
Other transport equipment	152.091	434.216	285.5%	7.8%
Water, sewerage and waste	241.358	353.934	146.6%	5.1%
Motor vehicles trade	461.410	348.337	75.5%	3.2%
Air transport	2.863	3.116	110.6%	4.2%
Warehousing & postal	485.419	608.886	125.4%	4.6%
I.T services	546.126	707.088	129.5%	4.7%
Head offices & management consultancies	159.622	384.130	240.7%	7.0%
Architectural & engineering services	267.721	244.425	91.3%	3.7%
Health	614.872	408.190	66.4%	2.9%

Source: Icen analysis of CE data

- 2.5 Coventry City has the largest economy within the sub-region, accounting for a third of its total GVA. Warwick makes a sizable contribution (22%), while Stratford-on-Avon (16%) the third largest. In comparison the size of the economies in Rugby (11%) and North Warwickshire (10%) and Nuneaton and Bedworth (7%) are smaller.
- 2.6 Warwick, Stratford-on-Avon and Nuneaton and Bedworth have seen the strongest comparative growth in GVA over the period since 2001, with growth rates in these authorities exceeding regional/national averages and driving the sub-region's overall performance. In contrast, growth has been weaker and notably below average in Rugby and Coventry. The strongest recent growth (post 2011) has been in Nuneaton and Bedworth and Stratford-on-Avon. Most authorities in the sub-region, with the exception of Rugby, have out-performed national growth rates.

Table 2.2 GVA Growth by C&W Authority

	2019 Share of GVA	GVA Growth, 2001-19 CAGR	GVA Growth, 2011-19 CAGR
North Warwickshire	10%	2.2%	3.5%
Nuneaton and Bedworth	7%	2.8%	4.0%
Rugby	11%	1.5%	1.1%
Stratford-on-Avon	16%	2.9%	3.7%
Warwick	22%	3.1%	3.5%
Coventry	33%	1.4%	2.0%
C&W		2.2%	2.8%
West Midlands		1.6%	2.1%
UK		1.7%	1.9%

Source: Icen analysis of CE data

- 2.7 Almost three quarters (72%) of growth in GVA over the 2011-19 period has been focused in Coventry, Stratford-on-Avon and Warwick; with Warwick alone accounting for 27%. Relative to the workforce distribution, growth has been stronger in Warwick and Stratford-on-Avon in particular (but weaker in Nuneaton and Bedworth).
- 2.8 Estimated GVA per job, as a measure of the relative productivity of the economy, sits between the regional and national averages. It is 6% below the UK average across Coventry and Warwickshire – although this is skewed by London’s role as a global City. It is however 8% above the West Midlands average.
- 2.9 Within the sub-region, the highest productivity performance appears to be in Warwick and Stratford-on-Avon– those areas which have seen the strongest recent relative growth. Nuneaton and Bedworth is the only authority below the regional average, and by a substantial margin.

Table 2.3 Productivity - GVA per Job

	GVA, £m 2018	Total Employment ('000s), 2018	GVA per Job
North Warwickshire	2796	54.6	£51,248
Nuneaton and Bedworth	1972	53.6	£36,757
Rugby	2830	52.9	£53,520
Stratford-on-Avon	4494	81.7	£54,977
Warwick	5854	101.1	£57,882
Coventry	8924	178.9	£49,877
C&W Total	26869	522.9	£51,388
West Midlands	141470	2969.7	£47,637
UK	1910247	34948.0	£54,660

Source: Icen analysis of CE data

- 2.10 Total employment in 2019 across Coventry and Warwickshire is estimated at 526,900 jobs. Manufacturing is the largest sector in employment terms, accommodating 58,000 jobs. The next largest sectors are education and professional services. There will invariably have been some impact of Covid-19 on total employment between 2019-20 with a subsequent recovery. ONS Jobs Density data points to a reduction of around 9,000 jobs 2019-20, equating to a reduction in employment of -1.7%.
- 2.11 More recent local data is not available but at the regional level, the evidence shows that the ground lost through the pandemic has now been regained with total workforce jobs in June 2022 which is 0.5% greater than that in June 2019 prior to the Covid-19 pandemic.⁴
- 2.12 A location quotient analysis has been used to assess the relative representation of sectors relative to that seen across the West Midlands region and UK.
- 2.13 The sectoral structure across Coventry and Warwickshire is relatively similar to that seen more widely across the region, with a slightly greater proportion of employment in education and professional services.
- 2.14 Relative to the structure of the economy nationally, a strong concentration of employment in manufacturing is evident (LQ 1.8) as well as activities associated with warehousing/logistics (such as wholesale trade, warehousing and postal). There is a slightly higher representation of education employment – which is likely to be influenced by the presence of the two universities. The universities play an important role in the manufacturing ecosystem. There is also a strength in utilities, albeit that actual job numbers are modest. Motor vehicles trade (as separate from manufacturing) is another strong employment area for the sub-region.

⁴ ONS Workforce Jobs dataset

Table 2.4 Employment Structure and LQ Analysis – Coventry & Warwickshire, 2019

	C&W Total ('000s)	% Jobs	LQ vs WM	LQ vs UK
Manufacturing	58.0	11.0%	1.1	1.8
Education	46.6	8.8%	1.1	1.1
Professional services	45.8	8.7%	1.2	1.0
Business support services	43.6	8.3%	0.9	1.0
Retail trade	38.3	7.3%	0.9	0.8
Accommodation & food	32.6	6.2%	1.0	0.9
Construction	31.7	6.0%	0.8	0.9
Health	30.5	5.8%	0.8	0.8
Residential and social	24.4	4.6%	0.9	0.9
Wholesale trade	24.3	4.6%	1.0	1.3
Warehousing and postal	23.5	4.5%	1.3	1.9
Public administration	17.6	3.3%	1.0	0.8
Motor vehicles trade	16.6	3.2%	1.2	1.7
Art and rec	15.4	2.9%	1.0	0.7
Other services	15.1	2.9%	1.1	1.0
Transport	13.9	2.6%	0.9	1.0
I.T services	13.8	2.6%	1.2	0.8
Financial & insurance	11.9	2.3%	1.0	0.7
Public utilities	10.9	2.1%	1.9	2.0
Real Estate	7.0	1.3%	0.8	0.8
Agriculture & mining	5.4	1.0%	0.8	0.8
Total	526.9	100.0%	1.0	1.0

Source: Icen analysis of CE data

- 2.15 The sectoral structure points to the influence of the history of manufacturing activity in the sub-region; together with a comparative advantage derived from its central location within the UK and accessibility across the country by road and rail. These factors underpin its strength as a manufacturing and distribution location.
- 2.16 The universities are also an important economic asset and potential hubs of innovation; with other major assets including the Manufacturing Technology Centre, The Proving Factory, JLR Gaydon and Horiba Mira as a focus for automotive R&D activity which have attracted a number of UK-leading companies.
- 2.17 We next consider further the structure of the manufacturing sector. Manufacturing activity is spread across a range of sectors and activities, however, it is clear that the motor vehicles industry in particular drives the manufacturing sector within the sub-region; which is evidently part of a wider regional cluster. The three largest manufacturing sub-sectors are Motor vehicles; Other transport equipment; and Machinery, as Table 2.5 shows. In contrast to other parts of the Midlands, there isn't a significant concentration of employment in Wood & paper; whilst pharmaceutical manufacturing is not strongly represented at a Warwickshire level.

2.18 The analysis points to some higher value manufacturing activities, such as machinery, in which there is a reasonable representation. However in contrast, employment and GVA in some notably higher value activities such as electronics, chemicals and pharmaceuticals is less strong. A number of the key manufacturing sub-sectors such as machinery and metals & metal products are reasonably lower value; albeit within a context in which productivity per job across the range of manufacturing sub-sectors is generally higher than many service sector activities emphasising the value in seeking to support/protect manufacturing jobs.

Table 2.5 GVA and Employment in Manufacturing Sub-Sectors

	GVA 2019 (£ million)	Employment 2019 (000s)	GVA per Job
Motor vehicles	2949.1	22.3	£132,280
Other transport equipment	586.3	1.7	£340,678
Machinery	488.6	6.1	£79,488
Metals & metal products	230.3	8.5	£27,193
Non-metallic mineral products	214.4	5.4	£39,949
Other manufacturing & repair	189.4	4.1	£45,959
Food, drink & tobacco	170.9	3.9	£44,157
Electrical equipment	116.1	1.4	£84,177
Electronics	108.4	1.0	£108,597
Textiles etc	51.4	0.9	£55,024
Chemicals	37.2	0.5	£73,874
Wood & paper	35.8	0.9	£37,893
Printing & recording	34.5	0.8	£45,401
Pharmaceuticals	29.9	0.5	£57,742

Source: Icen analysis of CE data

2.19 The chart below shows the structure of employment by LA district. We have highlighted those sectors in which there is a particular specialism, showing in light orange those with a LQ of between 1.5 – 1.9, and in dark orange those with a LQ of over 2.0.

2.20 Manufacturing is strong across the sub-region but is particularly strongly represented in Stratford-on-Avon (influenced by Gaydon in particular) and North Warwickshire. Transport and warehousing and postal activities are represented across a number of authorities (beyond Coventry), with particular concentrations in North Warwickshire and Rugby influenced by the strong accessibility of locations to the strategic road network and major sites such as Hams Hall and Birch Coppice in North Warwickshire; and the Swift Valley Industrial Estate, Central Park, Rugby Gateway and Progis Ryton in Rugby Borough.

Table 2.6 Sectoral Structure by District/Borough, 2019

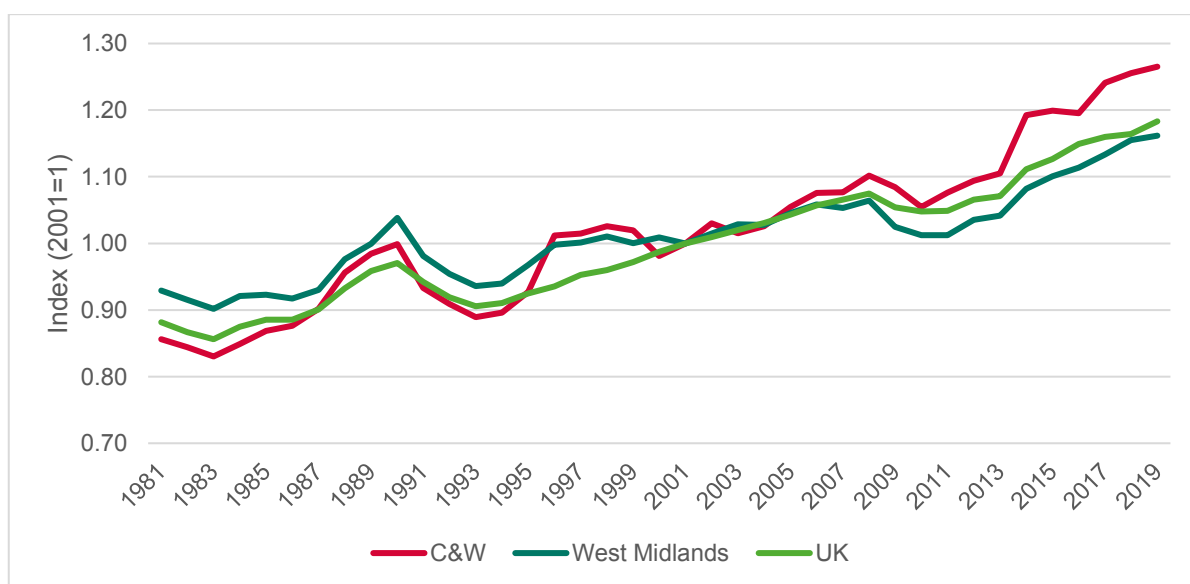
	North Warwickshire	Nuneaton and Bedworth	Rugby	Stratford-on- Avon	Warwick	Coventry	C&W Total
Total Jobs, 2019	53.9	54.8	55.8	85.2	98.1	179.1	526.9
Manufacturing	13.4%	11.2%	9.8%	16.1%	6.7%	10.6%	11.0%
Health & care	4.3%	15.0%	8.2%	9.5%	10.3%	12.1%	10.4%
Education	4.8%	8.4%	8.6%	6.2%	6.0%	13.1%	8.8%
Professional services	9.1%	5.9%	9.8%	8.8%	11.3%	7.6%	8.7%
Retail trade	9.5%	8.4%	7.2%	6.7%	6.5%	7.0%	7.3%
Business support services	7.6%	7.9%	8.8%	6.3%	7.6%	9.7%	8.3%
Construction	8.3%	7.1%	7.5%	6.6%	5.4%	4.6%	6.0%
Wholesale trade	5.2%	4.8%	3.8%	4.0%	5.8%	4.3%	4.6%
Accommodation & food	6.9%	4.7%	6.8%	8.7%	6.6%	4.8%	6.2%
Public Administration & Defence	0.9%	4.7%	2.6%	1.5%	5.3%	3.7%	3.3%
Warehousing & postal	12.1%	4.4%	8.2%	2.6%	3.3%	2.5%	4.4%
Other Services	1.6%	2.2%	2.3%	2.7%	5.1%	2.6%	2.9%
ICT	1.9%	1.6%	3.3%	2.9%	5.1%	2.6%	3.0%
Arts & rec.	1.4%	2.6%	2.3%	3.9%	2.7%	2.1%	2.5%
Transport	4.4%	3.8%	4.1%	2.1%	1.9%	2.0%	2.6%
Financial & insurance	0.6%	1.5%	1.8%	3.4%	1.3%	3.1%	2.3%
Motor vehicles trade	5.5%	2.8%	2.4%	2.9%	3.0%	3.0%	3.2%
Utilities	0.6%	1.7%	0.4%	0.2%	4.1%	2.9%	2.1%
Real estate	0.7%	0.8%	1.2%	2.0%	1.4%	1.3%	1.3%
Agriculture, mining	1.1%	0.6%	1.1%	2.8%	0.7%	0.4%	1.0%

Source: Icen analysis of CE data

2.21 It is notable that the concentration of utilities employment is particularly driven by employment in Warwick. This is likely to be influenced by the presence of a selected number of businesses in the sector within the District, such as National Grid at Warwick Technology Park. Agricultural activities are strongly represented in the more rural district of Stratford-on-Avon; albeit this overall is a relatively small sector in respect of overall employment. We also see a strong representation of arts and recreational and accommodation and good employment reflecting Stratford-upon-Avon's tourism draw. Leamington Spa has been a growing centre for gaming with evidence pointing to research pointing to a cluster of gaming companies, employing near to 1000 people in 2021.⁵

2.22 Prior to 1996, employment growth was comparatively weaker in Coventry & Warwickshire than across the region or nationally; notably with employment levels which remained fairly stable between 1996-2001. The sub-region then experienced a period of rapid economic growth between 2001-2008, but then a more notable drop in employment from 2009-2010 (with total employment indeed falling prior to the recession). Over the more recent period since 2011, the sub-region has seen particularly stronger employment growth and indeed has outperformed wider areas – seeing employment growth of 17.6% between 2011-19 compared to 12.8% across the UK and 14.7% across the West Midlands.

Figure 2.2: Employment Growth vs Wider Comparators



Source: Icen analysis of CE data

2.23 Overall between 2011-19 total employment increased by 78,700. The performance of individual districts within the sub-region has varied. Stratford-on-Avon and North Warwickshire have seen the strongest employment growth (consistent with the picture for GVA). In contrast total employment in Warwick is the only district with employment growth below that of the UK.

⁵ <https://www.businessinnovationmag.co.uk/leamington-spa-a-major-hub-for-the-uks-gaming-sector/>

Table 2.7 Employment Growth, 2011-19

000s	Employment, 2011	Employment, 2019	Change ('000s)	% Change
North Warwickshire	43.0	53.9	10.9	25.4%
Nuneaton and Bedworth	48.2	54.8	6.7	13.8%
Rugby	48.8	55.8	7.0	14.3%
Stratford-on-Avon	66.3	85.2	18.8	28.4%
Warwick	89.4	98.1	8.7	9.7%
Coventry	152.4	179.1	26.7	17.5%
C&W	448.1	526.9	78.744	17.6%
West Midlands	2602.8	2986.6	383.7	14.7%
UK	31486	35517.0	4031	12.8%

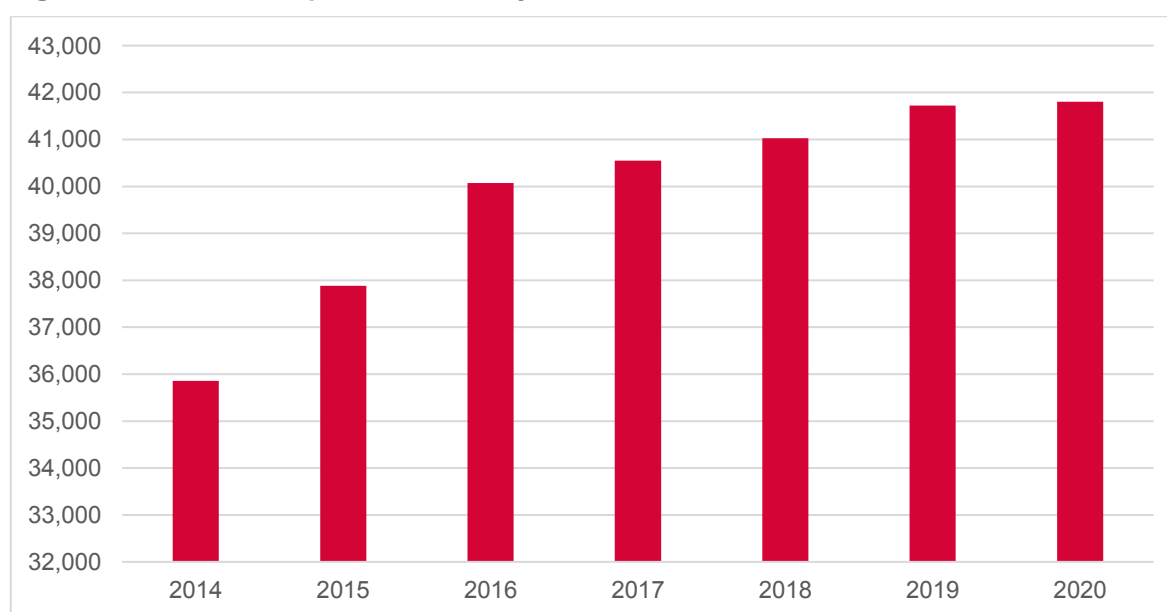
Source: Icen analysis of CE data

- 2.24 Research undertaken by Centre for Cities in 2017 based on HESA's destination of leavers survey for the period 2014-2015 shows that Coventry only retains 15 per cent of its university graduates, the fourth lowest among UK cities. Of the graduates from the University of Warwick only 6 per cent stay in Coventry. Coventry University does however have a much higher number of students attend who are originally from Coventry in comparison to the University of Warwick.

Business Base

- 2.25 The number of active enterprises in Coventry and Warwickshire grew by 17% between 2014-20, which was just under the national average (18%) and notably below the regional level (22%). As the table below shows, much of this growth was between 2014-16.

Figure 2.3: Active Enterprises – Coventry and Warwickshire



Source: ONS Business Demography Statistics

2.26 An assessment of the density of businesses, relative to the working-age resident population, shows the highest business densities are in Stratford-on-Avon and Warwick; albeit that the business density is also above regional average in most authorities with the exception of Nuneaton and Bedworth and Coventry.

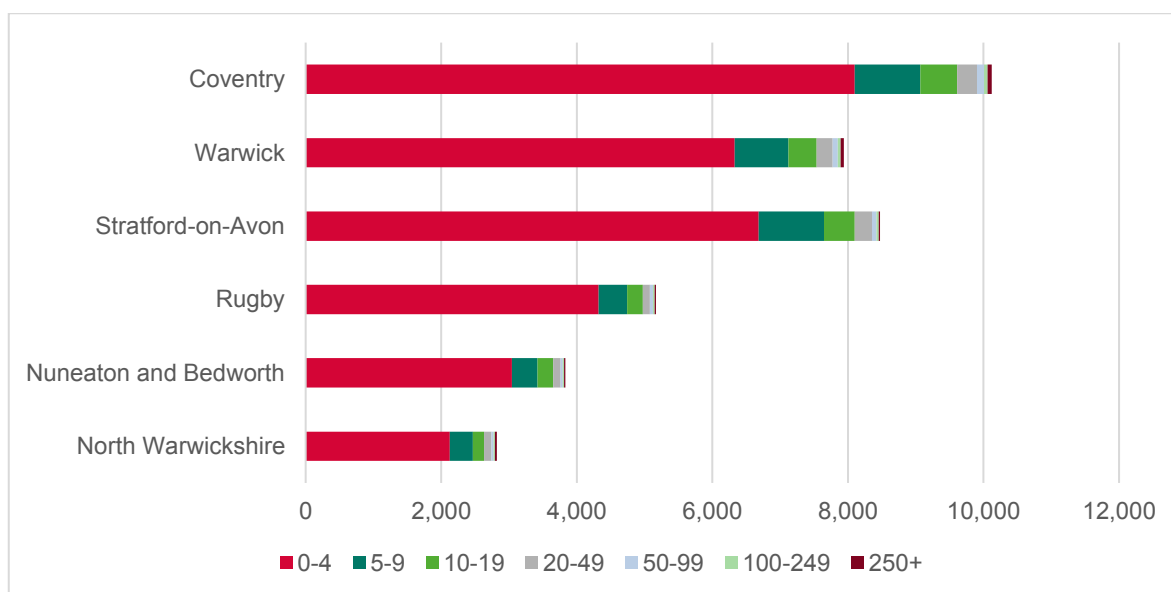
Table 2.8 Business Density, 2019

	Active Enterprises, 2019	Enterprises per 1000 Population 16-64
North Warwickshire	2,980	75
Nuneaton and Bedworth	4,330	54
Rugby	5,540	82
Stratford-on-Avon	8,520	111
Warwick	8,620	93
Coventry	11,735	46
C&W	41,725	62
West Midlands	240,365	65
UK	2,990,320	85

Source: Icen analysis of ONS Business Demography Statistics

2.27 Across the sub-region, 80% of businesses have less than 10 employees, and 99.6% are Small and Medium-Sized Enterprises with less than 250 employees. There are a total of 185 larger enterprises with 250+ staff of which 60 are in Coventry. The structure of the business base by size is broadly consistent with that across the wider region.

Figure 2.4: VAT or PAYE Enterprises by Size Band, 2020

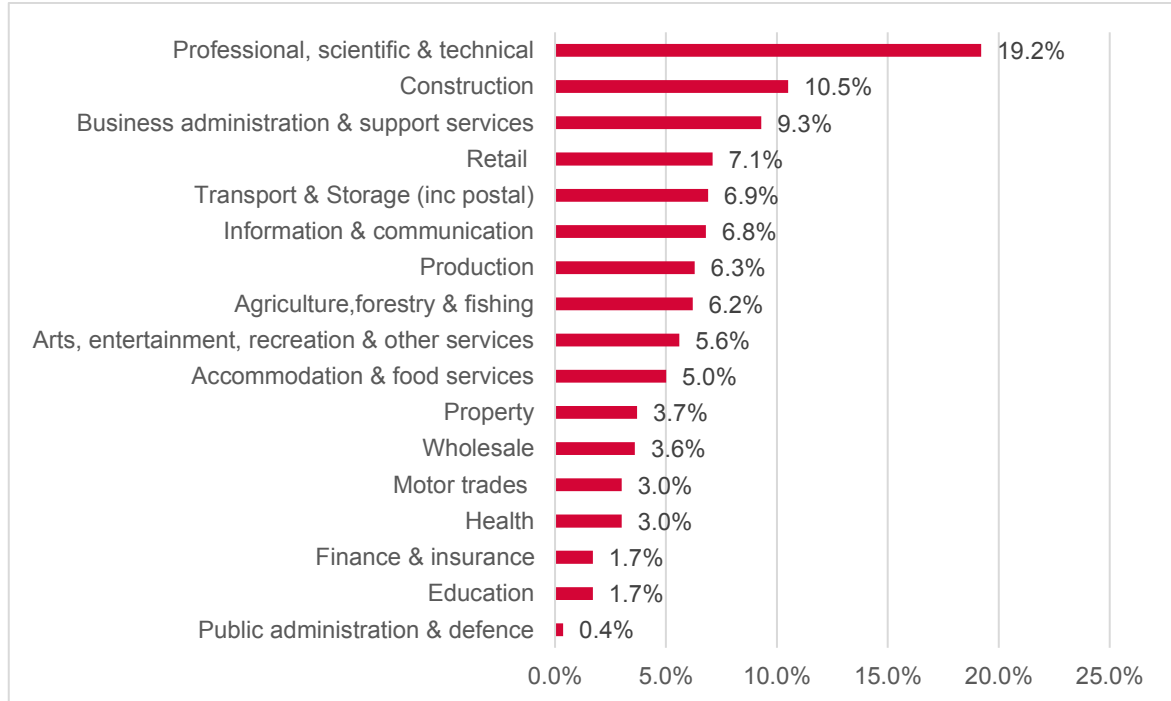


Source: Icen analysis of ONS / IDBR data

2.28 The structure of VAT and/or PAYE businesses by sector shows a particular relative concentration in motor trades, wholesale, property and education. ICT and construction are relatively under-

represented relative to the profile nationally, while conversely transport and storage, and professional, scientific and technical roles outperform the national profile.

Figure 2.5: Profile of VAT/PAYE Enterprises by Sector, Coventry & Warwickshire 2020



Source: Icen analysis of ONS / IDBR data

2.29 If we drill into the differences in structure between different local authorities, we find that construction businesses are strongly represented in North Warwickshire. Transport and storage are strongly represented in Rugby and Nuneaton and Bedworth. There is a concentration of businesses in the information and communication as well as professional, scientific and technical industries in Warwick, which will include those within the gaming sector, with the south of the county more orientated towards service-sector businesses.

Table 2.9 LQ Analysis of VAT/PAYE Businesses by Location, 2020

	North Warwickshire	Nuneaton and Bedworth	Rugby	Stratford-on- Avon	Warwick	Coventry	C&W	West Midlands	UK
Agriculture, forestry & fishing	1.2	0.2	1.0	1.6	0.4	2.8	1.1	1.0	1.0
Production	1.2	1.3	0.7	0.8	0.8	1.0	0.9	1.3	1.0
Construction	1.3	1.0	0.8	0.9	0.7	1.1	0.9	0.9	1.0
Motor trades	1.2	1.3	0.9	0.8	0.8	0.9	0.9	1.2	1.0
Wholesale	0.8	0.9	0.7	0.8	1.3	1.0	0.8	1.2	1.0
Retail	0.9	1.0	0.7	0.8	0.3	0.7	0.9	1.0	1.0
Transport & Storage (inc postal)	0.9	1.6	2.7	0.6	0.9	0.4	1.0	1.5	1.0
Accommodation & food services	1.0	0.9	0.7	0.9	1.7	0.9	0.9	1.0	1.0
Information & communication	0.8	1.0	1.3	1.0	1.1	0.7	1.2	0.7	1.0
Finance & insurance	0.9	1.0	0.9	1.1	4.1	1.1	1.0	0.7	1.0
Property	1.1	0.6	0.9	1.3	1.2	1.1	1.1	0.9	1.0
Professional, scientific & technical	0.9	0.9	1.2	1.5	1.8	1.1	1.4	0.8	1.0
Business administration & support services	0.9	1.0	0.7	0.8	0.9	0.7	0.8	1.3	1.0
Public administration & defence	1.7	0.4	1.2	2.1	1.0	1.9	1.4	1.1	1.0
Education	0.9	0.9	1.2	1.1	1.1	1.0	1.1	1.0	1.0
Health	0.6	0.8	0.6	0.7	0.9	0.7	0.7	1.1	1.0
Arts, entertainment, recreation & other services	0.9	1.0	0.9	1.1	1.0	1.1	1.0	0.9	1.0

Labour Market

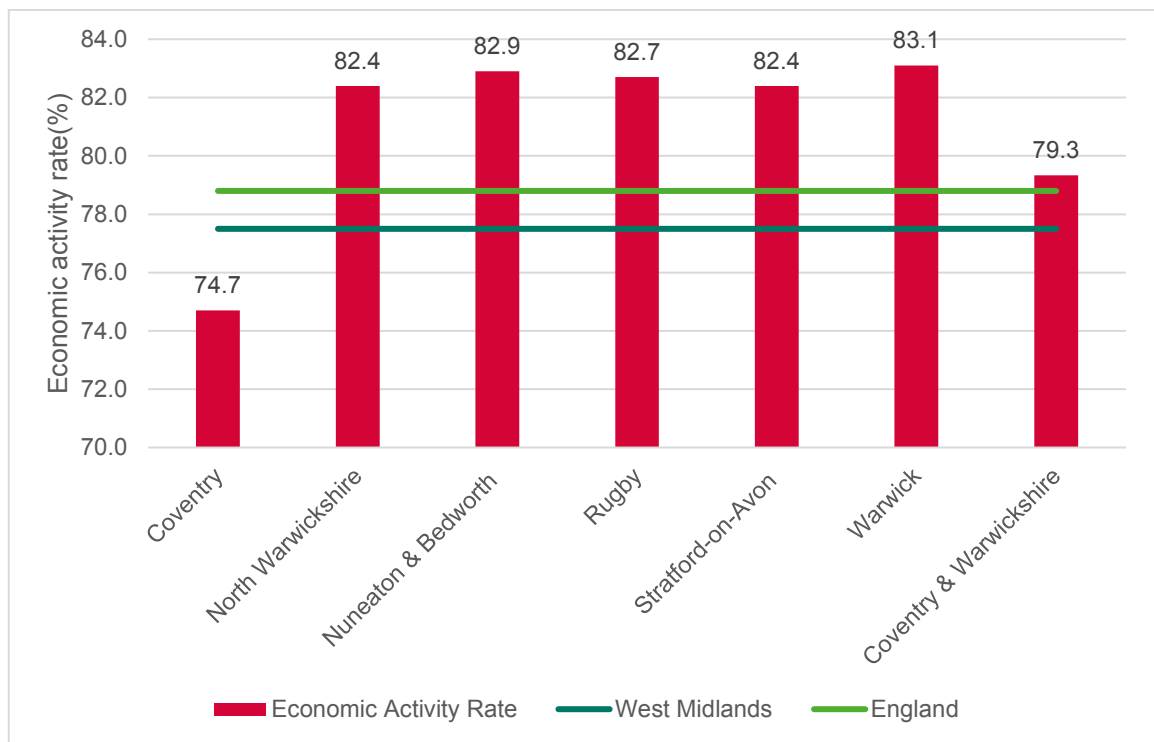
2.30 In this section we turn to assess labour market characteristics and performance, addressing issues associated with economic participation, skills and earnings.

Economic Participation

2.31 There are two key measures of economic participation: the economic activity rate which describes the percentage of the working-age population (aged 16-64) who are either working or looking for work; and the employment rate, which describes those within this age group who are in work.

2.32 The economic participation rate in the sub-region (79.3%) is marginally above the national rate (78.8%) but considerably stronger than the region (77.5%). Within the sub-region it is lower in Coventry by some margin (74.7%). In contrast stronger levels of economic participation are evident in all the Warwickshire local authorities.

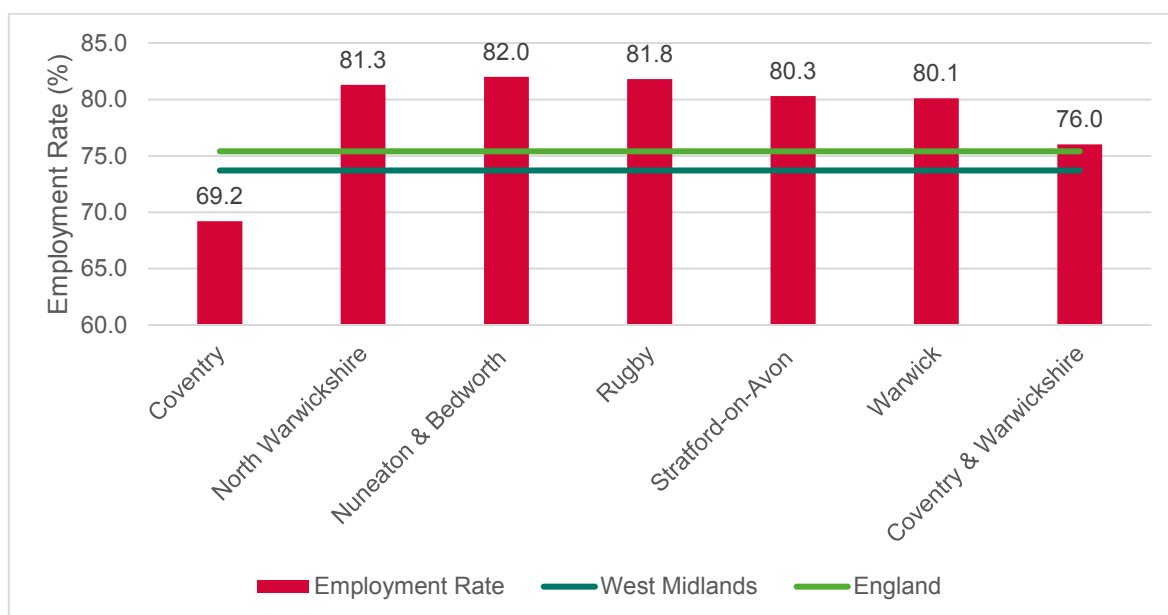
Figure 2.6: Economic Activity Rate (2021/22)



Source: Annual Population Survey (April 2021 – March 2022)

2.33 A similar picture is evident considering the employment rate, as shown in Figure 2.7. The employment rate across Coventry & Warwickshire (76.0%) is slightly higher than the national comparator (75.4%) and moderately higher than the region (73.7%). The employment rate is notably lower in Coventry than across Warwickshire.

Figure 2.7: Employment Rate (2021/22)



Source: Annual Population Survey (April 2021 – March 2022)

Unemployment

- 2.34 ONS model-based estimates of unemployment point to unemployment levels at 20,300 in 2020 (albeit that they will clearly have varied within the year), with a particular concentration of unemployment in Coventry which has 11,300 unemployed (50% of the C&W total). Coventry is the only authority where the unemployment rate is above the national average. The latest Annual Population Survey data (for the year to March 2022) has unemployment across the sub-region at 20,000. This appears to reflect in particular a concentration of unemployment in Coventry.

Table 2.10 ONS Modelled Unemployment, Jan-Dec 2020

	Unemployment, 2020	% 16-64	% C&W Distribution
North Warwickshire	1,300	4.0%	6%
Nuneaton and Bedworth	3,200	4.8%	14%
Rugby	2,200	4.0%	10%
Stratford-on-Avon	2,000	3.1%	9%
Warwick	2,500	3.1%	11%
Coventry	11,300	5.9%	50%
Coventry & Warwickshire	20,300	4.2%	100%
West Midlands		5.3%	
Great Britain		4.6%	

Source: NOMIS (authority totals do not sum due to rounding)

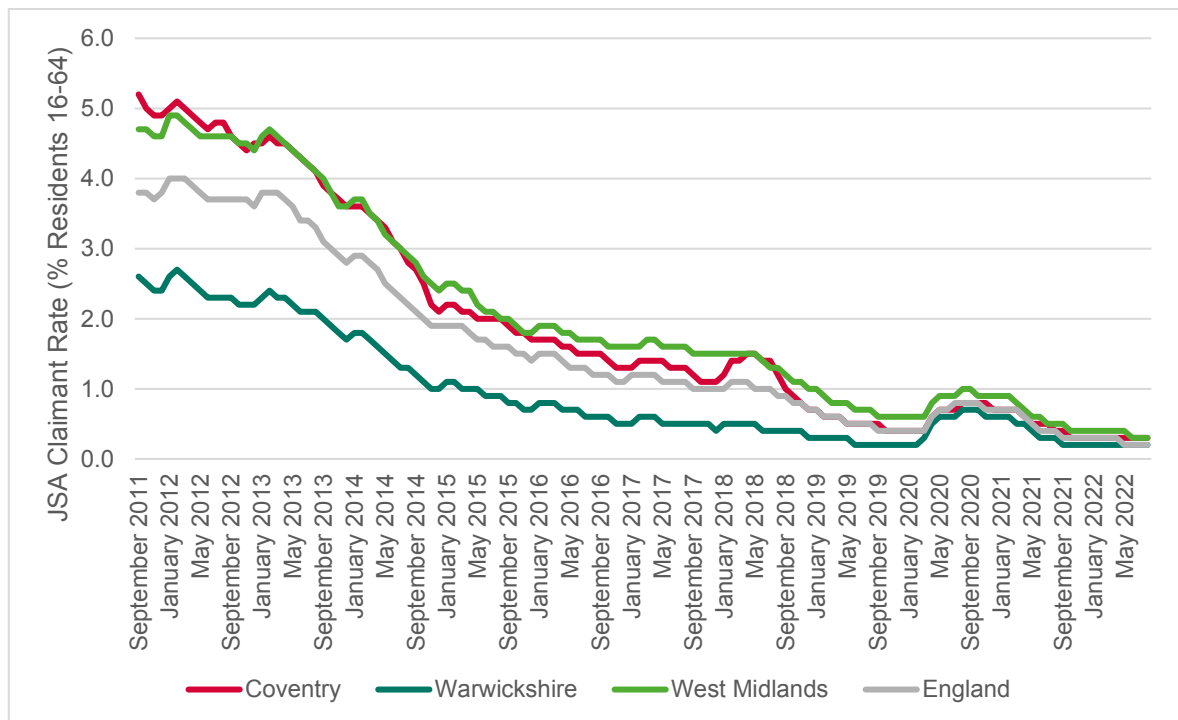
- 2.35 The ONS estimates above are modelled using Annual Population Survey data and based on a person's self-classification as being 'out of work' and 'currently and actively seeking to work'. The

claimant rate is an alternative indicator of unemployment which is measured as the number of people who are receiving benefits principally for the reason of being unemployed divided by the number of workforce jobs plus the claimant count. Whilst there is crossover between the claimant rate and the unemployment rate, they measure slightly different things, but both provide good indicators for actual levels of unemployment. Importantly the claimant count is published in a more timely manner and was available up to June 2021 at the time of writing.

2.36 The figure below shows changes in claimant unemployment over time. Prior to the Covid-19 pandemic in 2019, the claimant rate in the Study Area was 0.4% in Coventry and 0.2% in Warwickshire (as a percentage of the resident population aged 16-64).

2.37 It can be seen that the claimant rate follows a similar pattern across all areas; with rising unemployment in 2020 influenced by the Covid-19 pandemic. It has however fallen in all areas: in Coventry it stands at 0.3% in August 2022 (consistent with the regional average), with a figure of 0.2% across Warwickshire (consistent with the national average). This represents conditions of near full employment.

Figure 2.8: Claimant Rate (June 2010 to June 2020)



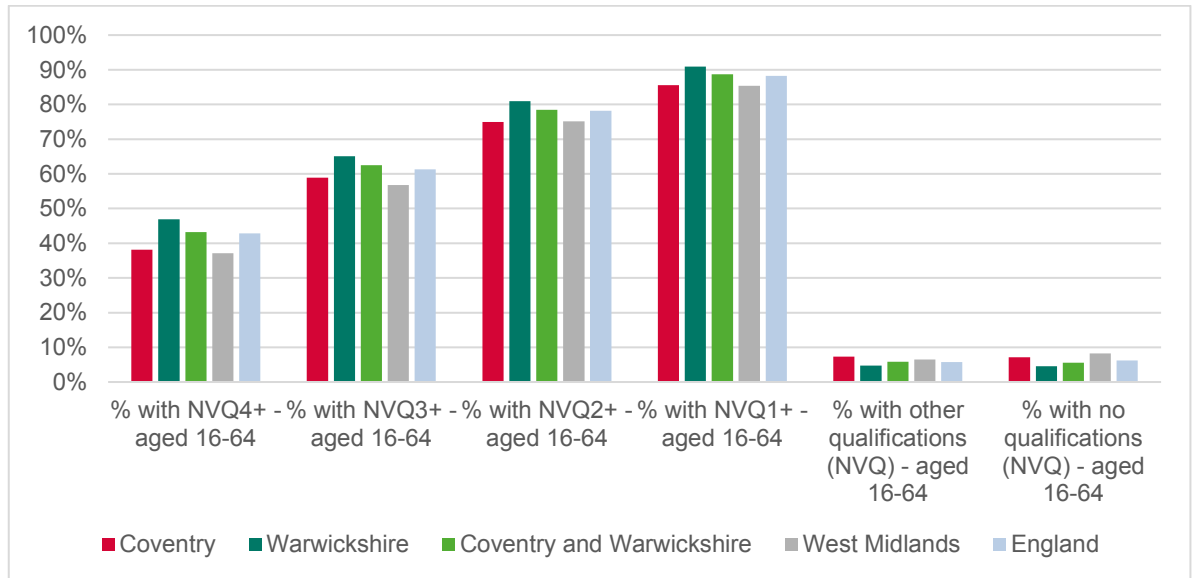
Source: ONS JSA Claimant Rate

Qualifications and Skills

2.38 The qualifications levels of the population indicate how employable the local workforce is. The percentage of the population with NVQ4+ (degree level) qualifications in the Study Area is slightly

above the West Midlands average but slightly below the English average. The percentage Coventry and Warwickshire's population with no qualifications is below or same as that of the comparator areas.

Figure 2.10: Qualifications (2020)



Source: Annual Population Survey

2.39 Drilling down to the position within individual local authorities, Warwick and Stratford-on-Avon have a greater concentration of higher level skills (NVQ4+), which equates to degree-level skills or equivalent. At the other end of the spectrum, Nuneaton and Bedworth has just 30% qualified to this level. Our analysis is based on data over the 2018-20 period to address small sample sizes in some areas.

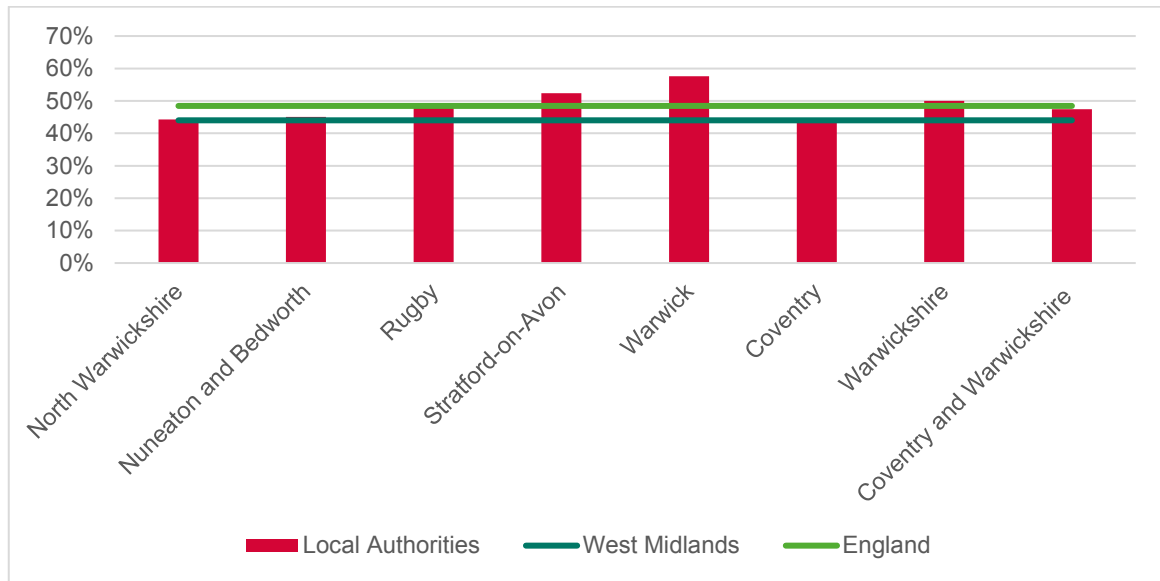
Figure 2.11: % 16-64 qualified to NVQ4+ (2020)



Source: Annual Population Survey

- 2.40 The occupational split of the population provides an indication of where those working in higher paid/skilled jobs are living. The figure below shows the percentage of each area's population in the top 3 occupational groups (Managers, directors and senior officials, Professional occupations, Associate prof & tech occupations). The highest proportions of these workers are seen in Warwick and Stratford-on-Avon (over 52%) contrasting with prevalence of just 43% in Coventry.
- 2.41 Warwickshire has slightly greater levels of employment in the top 3 occupational groups than England whereas Coventry is slightly below the regional average.

Figure 2.12: Employment in Top 3 Occupational Groups (2018-2020)

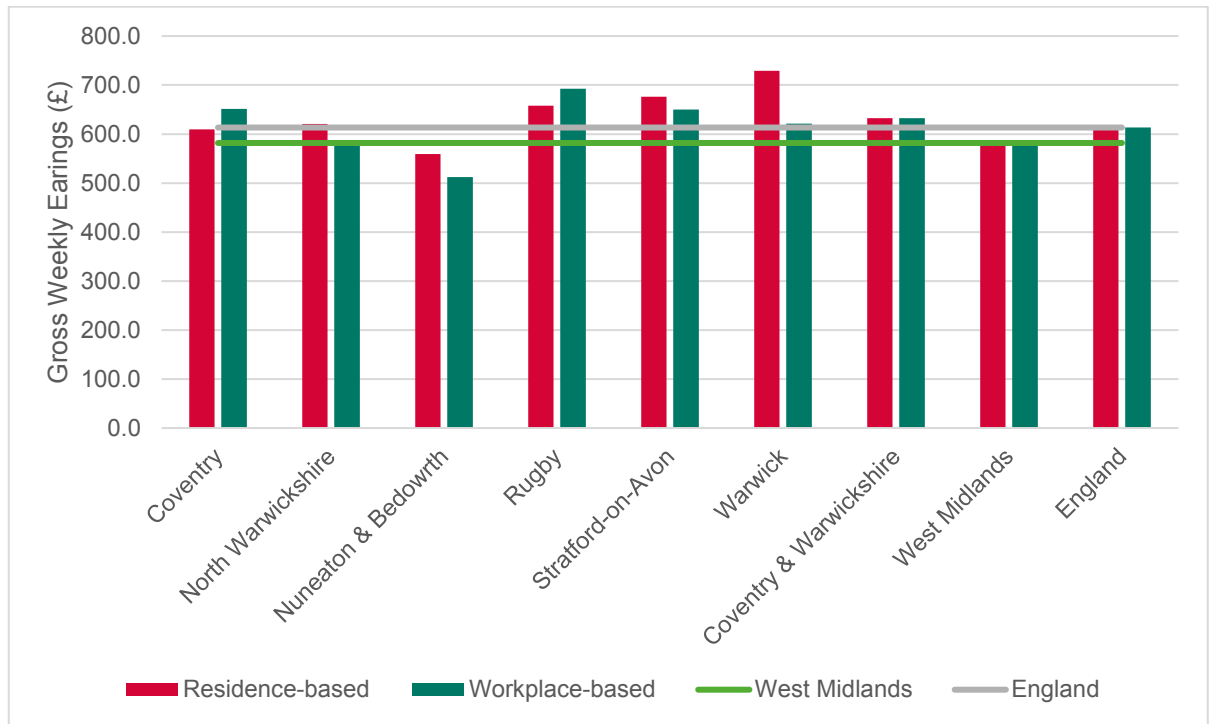


Source: Annual Population Survey

Earnings

- 2.42 Median workplace earnings provide an indication of the quality of the jobs available in an area. Median earnings for full-time jobs in Coventry and Warwickshire (£632 per week) are higher than the West Midlands (£582) and across England as a whole (£613). Median workplace earnings in Coventry (£652) are 12% above the regional and 6% above the national average. Stronger workplace earnings in Warwick and Coventry reflect a greater density of higher paid jobs in these areas.
- 2.43 Coventry and Rugby see higher earnings for those working in the authority than living in it, pointing to in-commuting of higher earners. The converse is true of most Warwickshire authorities, with particular significant differentials in Warwick followed by Nuneaton and Bedworth and North Warwickshire. Earnings of those working in Nuneaton and Bedworth are notably below wider benchmarks with gross weekly earnings of £513. Higher earnings are principally evident in those areas which see a greater concentration of higher paid jobs.

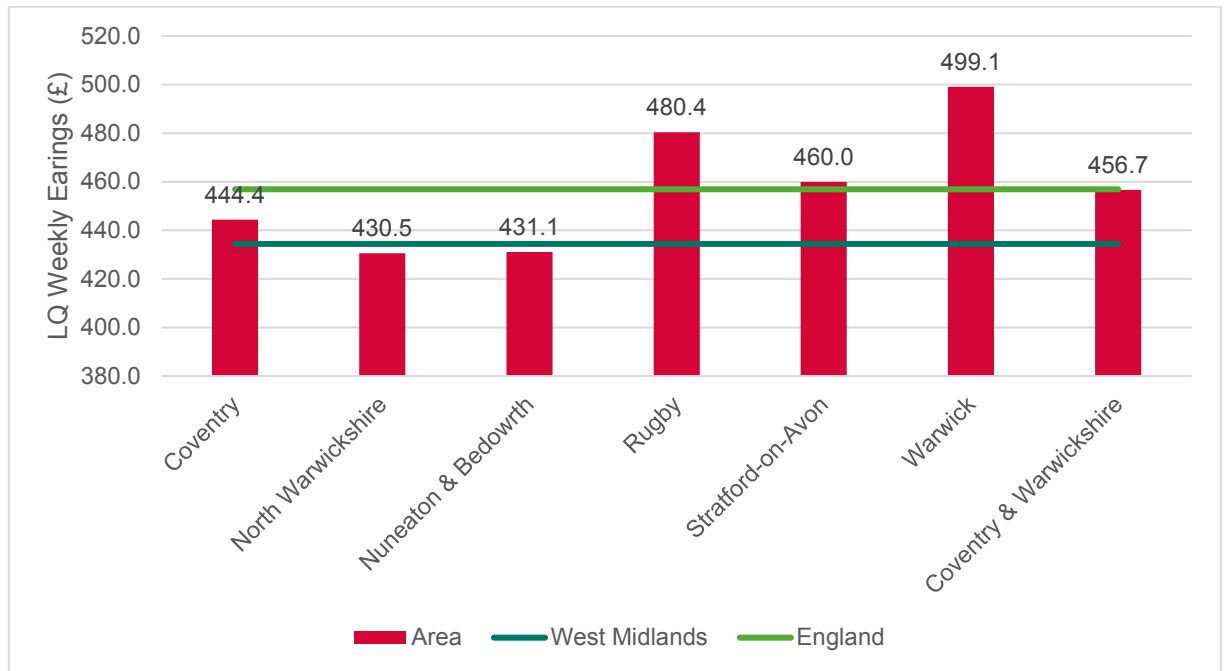
Figure 2.13: Comparison of Residence- and Workplace-based Earnings (2021)



Source: Annual Survey of Hours and Earnings

2.44 Lower quartile workplace earnings provide an indication of the quality of lower paid jobs and prevalence of lower paid jobs available in an area. Lower quartile workplace earnings in Warwickshire (£425) are higher than those across the West Midlands (£410) but lower than across England (£432). In Coventry lower quartile workplace earnings are £430 – higher than the West Midlands.

Figure 2.14: Lower Quartile Gross Weekly Workplace-based Earnings (2020)



Source: Annual Survey of Hours and Earnings

Coventry & Warwickshire Quarterly Economic Survey

2.45 p

Summary and Key Points

- Coventry and Warwickshire is a £26bn economy and accommodated 526,900 jobs in 2019. It has grown relatively strongly since 2013 and whilst employment has been impacted by Covid-19 we have now seen the economy recover.
- Key sectors sector strengths include manufacturing, which accommodates 58,000 jobs where Brexit is creating uncertainties; as well as warehousing/logistics, where demand is currently strong influenced by growth in e-retailing; and education. The manufacturing and higher education strengths, together with employment in ICT and professional and scientific sectors supports productivity which is above the regional average. There is however a particular concentration of lower paid jobs in Nuneaton and Bedworth which policy should seek to address.
- While 80% of businesses employ less than 10 people, business densities are significantly below the national average influenced in part by larger employers, but also potentially by entrepreneurial activity. There are strong concentrations of small businesses in professional,

scientific and technical activities, ICT and professional services – especially in Warwick District – and in construction.

- Economic participation levels are generally reasonable, at 80%, but lower in Coventry. As with many areas, the pandemic had resulted in growth in unemployment, which appears to remain persistently high in Coventry in particular. Overall labour market conditions are now tight. There are economic uncertainties in the short-term related to impacts of rising costs (inflationary pressures) in particular linked to rising energy costs, initiated by the war in the Ukraine.

3. COMMERCIAL PROPERTY MARKET DYNAMICS

- 3.1 This section provides an assessment of the commercial property market in Coventry and Warwickshire focused on offices (including office and R&D space) and industrial (including industrial and warehouse/ distribution space). The analysis uses the latest data at the time of its original preparation in mid 2021. We have included selected additional comments on more recent trends.
- 3.2 Valuation Office Agency (VOA) and Co-star data have been used to undertake the analysis below. It should be noted that both datasets have caveats and limitations. The VOA database has its own criteria for what is counted as office and industrial space which is different from that used by Co-star. Furthermore, Co-star does not capture all properties in a given area.

UK Office Market Overview

- 3.3 We first consider national office market dynamics over the last few years. Office markets across the UK demonstrated a level of resilience in 2019 set against a context of wider economic uncertainty linked to Brexit. Knight Frank's UK Cities Overview 2019 reports that leasing volumes finished the year 8% above the long-term trend as business change strategies continued to motivate space moves. Notably, despite concern derived from Britain's impending exit from the EU, foreign investment increased by 10% year-on-year to £1 billion representing 37% of total investment turnover.
- 3.4 Cushman and Wakefield reported that office take-up for the whole of 2020 was 7.7 million sqft – comparable to the year after the global financial crisis. During the second quarter, the UK-wide lockdown which saw most offices across the UK become temporarily closed, had a significant impact on take-up. Q2 2020 take-up therefore saw a 73% decrease from the five-year quarterly average. Whilst take-up remained below the long-term average in the second half of 2020, it did grow, particularly in Q4. Furthermore, in the final quarter of 2020, despite being 33% lower than Q4 2019, office investment turnover rose from the previous quarter signalling some growth in confidence in the sector with businesses sentiment indicating that the office remains important.
- 3.5 CBRE report that in the first quarter of 2021 office take-up was 75% down on the same period in 2020. Furthermore, in the 12 month office take up to Q1 2021 was the lowest on record since 2004 – reflecting the impact of the pandemic over a full year. Office availability increased by 7% over the quarter, reaching 23% above Q1 2020. Savills reported that despite decreased take-up on previous years in Q1 2021, there has been a significant increase since the lowest point in the pandemic (Q2 2020) – over 200% in regional office markets (i.e. beyond London). This demonstrates that regional

office markets are in the process of recovery. Furthermore, despite economic uncertainty, rental growth of prime office space continued to grow in almost all regional markets.

- 3.6 The evidence is that the pandemic is resulting in a continuing shift towards more flexible working patterns with increasing numbers of people working at least part of the time from home; but offices remain important in companies' culture, the work community, interaction between colleagues and training. The longer-term more structural trend may be of reduced space requirements as more office workers spend at least part of the week at home; and the market has been seeing occupiers reducing their office footprint on lease events. Alongside this we are seeing a 'flight to quality' with demand remaining for better quality 'Grade A' stock..

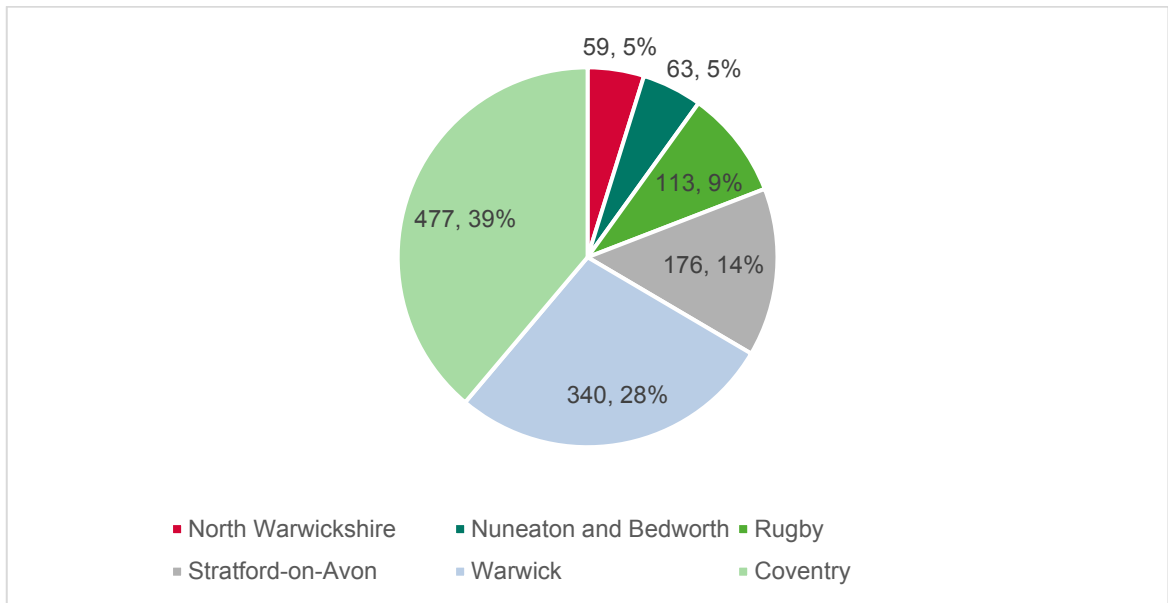
Coventry and Warwickshire Office Market

Office Stock

- 3.7 The VOA⁶ provides information on the number of rateable office properties by administrative area for the period between 2001 and 2020. There were 5,440 office properties in 2020 providing 1,228,000 sqm of office floorspace in total across Coventry and Warwickshire. This represents 18.7% of the office floorspace across the West Midlands. This suggests that the Study Area has a relatively large office sector given its working age population makes up 16.2% of that of the West Midlands.
- 3.8 Coventry supports a large proportion of the Study Area's office stock (39%) at 477,000 sq.m followed by Warwick (28%) with 340,000 sqm. On the other hand, floorspace in North Warwickshire and Nuneaton and Bedworth makes up just 10% of the Study Area's office floorspace.

⁶ VOA: Non-domestic rating: stock of properties including business floorspace, 2019/2

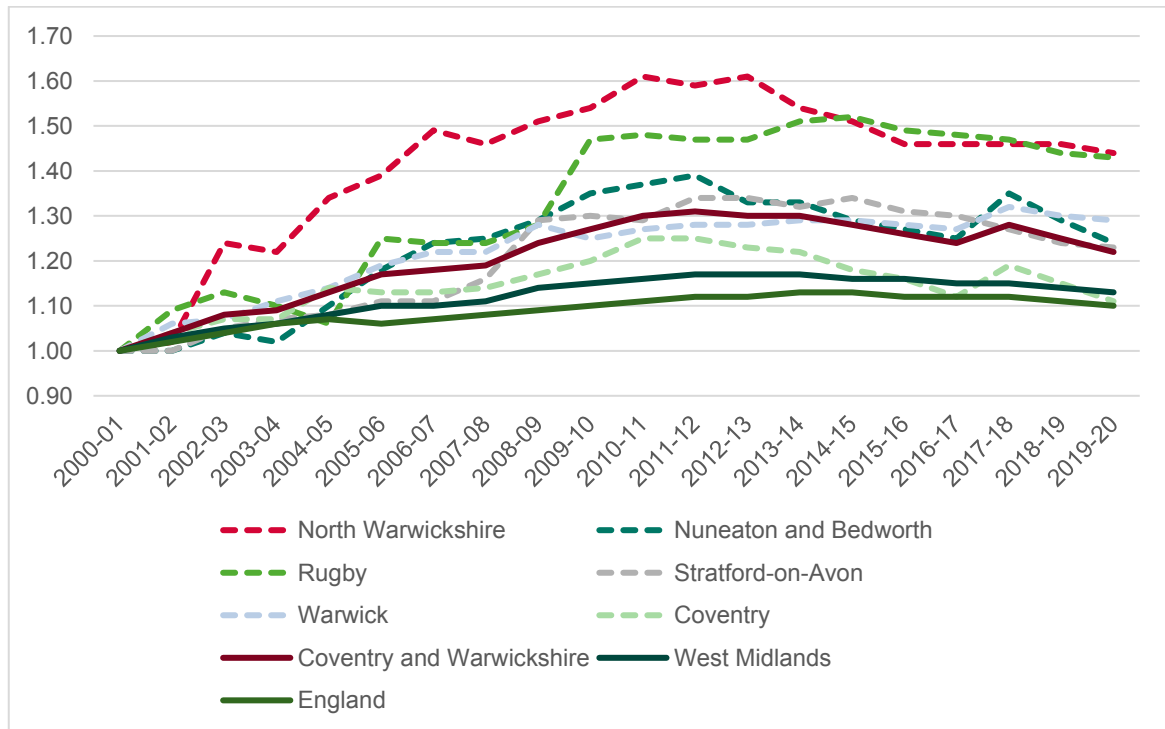
Figure 3.1: Office Floorspace by Authority Area 2019/20 (Thousands of sqm; %)



Source: VOA: Non-domestic rating: stock of properties including business floorspace, 2020

- 3.9 The main office markets are Coventry and Leamington/Warwick, accounting for over half the office space in the sub-region, followed by Stratford-upon-Avon.
- 3.10 The figure below shows the change in total office floorspace by location between 2000 and 2020. It shows that over the last 20 years the total office floorspace across Coventry and Warwickshire has increased at a greater rate than the West Midlands and England as a whole (21.9% compared to 12.8% and 10% respectively). Office floorspace growth across North Warwickshire and Rugby has been even greater (43.9% and 43% respectively). On the other hand, growth across Coventry was lower than the average for the study area – roughly in line with the regional and national values at 11.2%.
- 3.11 Whilst 20 year growth has exceeded that which has occurred regionally and nationally, the quantum of office floorspace peaked in 2012. The decline in office floorspace over the last 10 years has been greater in Coventry and Warwickshire than across the West Midlands and England as a whole (-6.5% compared to -2.4% and -1% respectively).

Figure 3.2: Indexed Office Floorspace by Local Authority 2010/11 - 2019/20



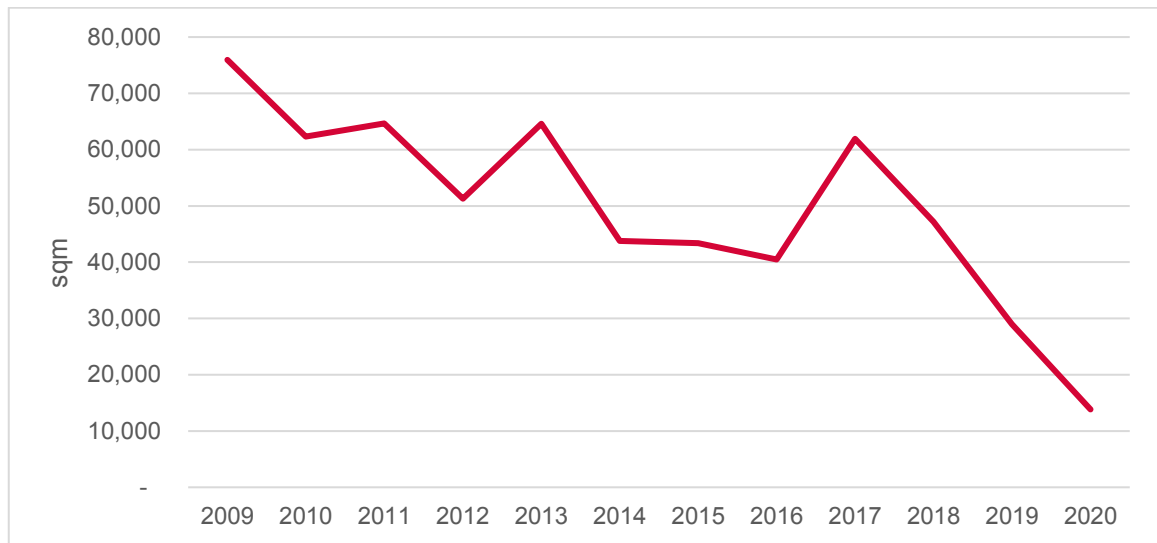
Source: VOA: Non-domestic rating: stock of properties including business floorspace, 2020

Absorption, Delivery and Vacancy Trends

- 3.12 Gross absorption is the amount of space which has become physically occupied (moved in to). It provides an indication of the strength of the market but does not take into account the amount of space vacated and hence is not a measure of new demand.

- 3.13 The figure below shows that gross absorption decreased across Coventry and Warwickshire between 2009 and 2020. This occurred at a greater rate since 2017. The evidence thus points to a relatively sustained decline in the scale of office take-up.

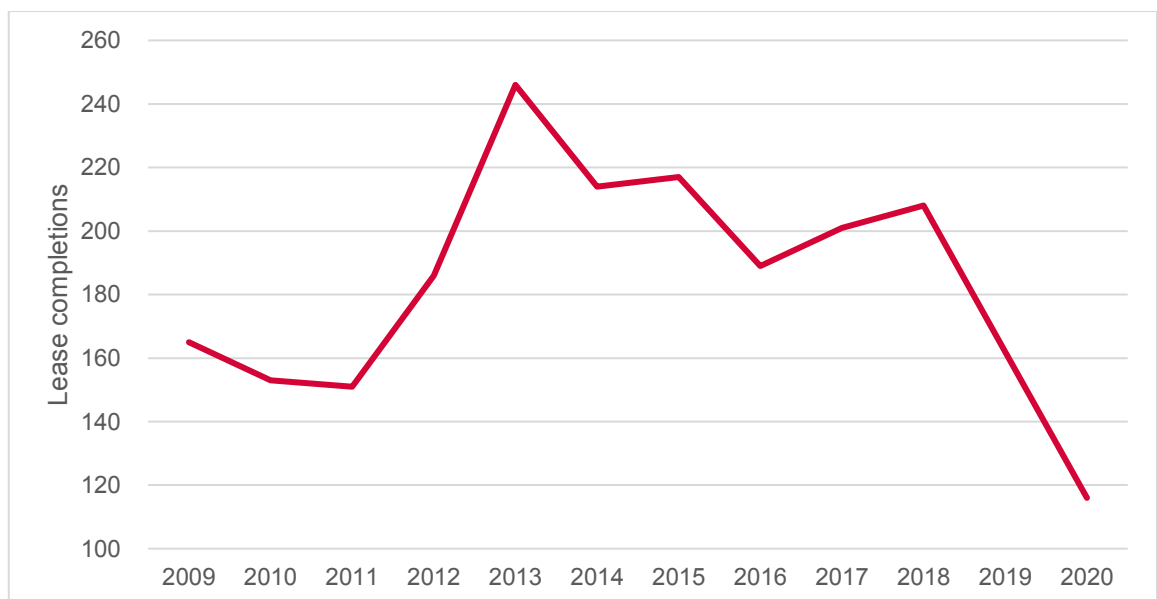
Figure 3.3: Gross Absorption of Office Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

3.14 To supplement gross absorption data (amount of space moved in to), lease completions (number of properties leased) data has also been analysed to help paint a picture of demand for office space without taking into account the size of leases/move ins. The figure below shows that unlike for gross absorption, lease completions actually went up between 2009 and 2013 indicating an increased demand for space. However, since then lease completions have fallen in a similar manner to gross absorption.

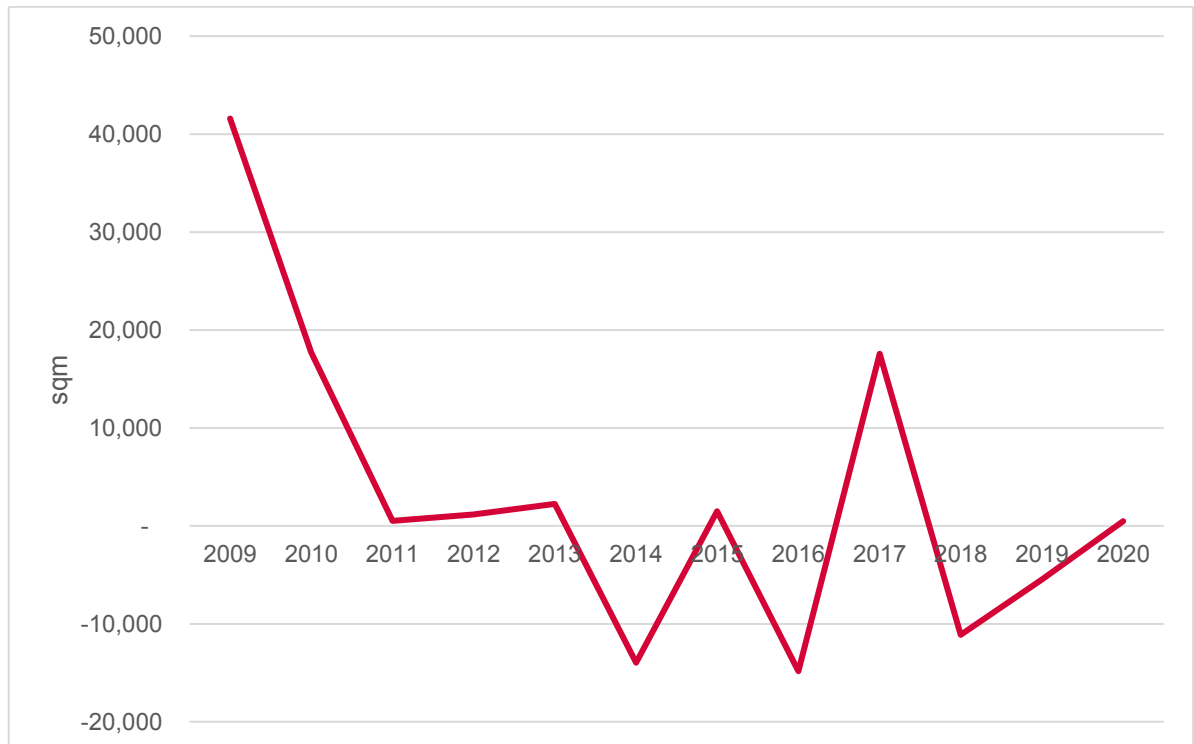
Figure 3.4: Lease Completions for Office Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

3.15 There was around 37,000 sqm of net new office floorspace delivered between 2009 and 2020. However, as can be seen in the figure below, *net* deliveries (the balance between new-build construction and losses) have been varied greatly over this period with a peak of 42,000 sqm in 2009 to a trough of -15,000 sqm in 2016. Over the 2010-20 period as a whole, there was a greater proportion of office space lost than built, resulting (based on CoStar data) in a modest reduction of just over 4,000 sq.m in the sub-region's office stock.

Figure 3.5: Net Deliveries of Office Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

3.16 CoStar provides data on net absorption which describes the net change in physically available space which is calculated by deducting the space vacated by tenants and made physically available within the local market from the total space which becomes physically occupied and is lost (e.g. through demolition). Therefore, net absorption indicates that net change in demand relative to supply of space. A positive net absorption figure means that the proportion of vacant space is falling, whilst a negative level indicates that more space was coming onto the market than being taken-up/lost.

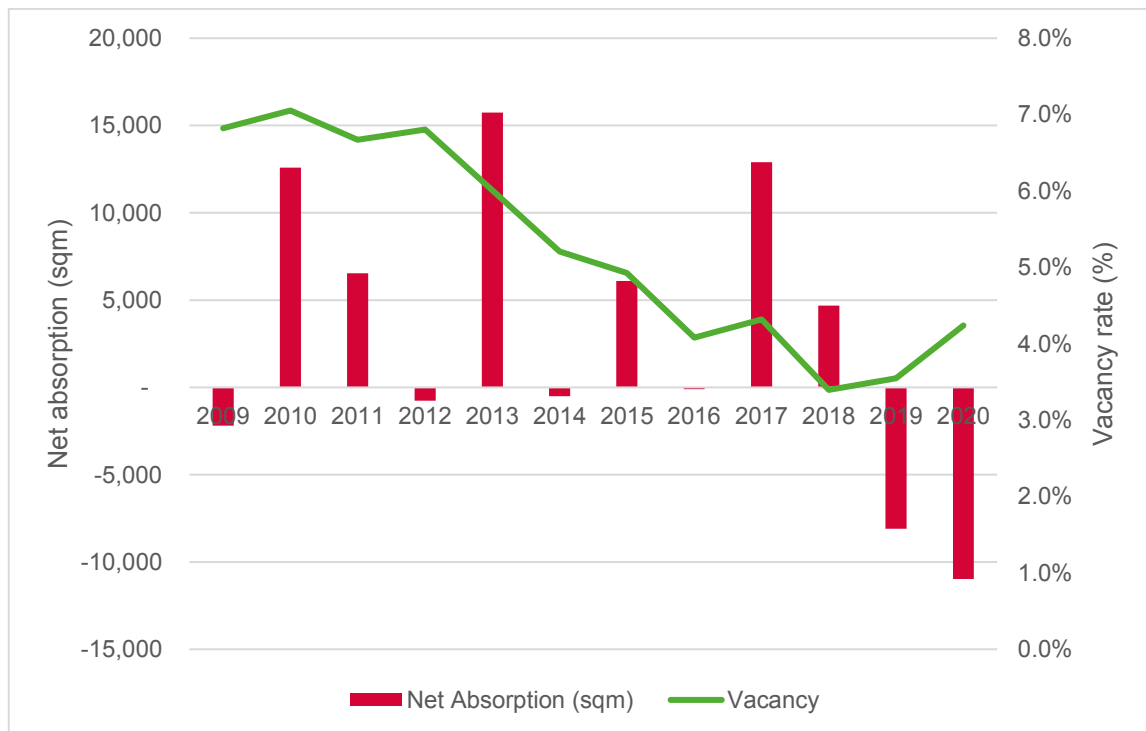
3.17 The figure below shows absolute net absorption and vacancy rates across Coventry and Warwickshire between 2009 and 2020. It can be seen that between 2009 and 2018, net absorption was generally positive resulting in a sustained drop in the level of vacant office floorspace to levels

well below that which might be expected in a functioning market.⁷ However, in 2019 and 2020 net absorption was negative at -87,000 sqm and -118,000 sqm.

3.18 Over the period between 2009 and 2020 there was an overall net absorption of around 36,000 sqm of floorspace. This suggests strong demand relative to the supply of office floorspace. This has arisen through a combination of take-up of space by businesses and declining stock (such as through losses/conversion of office space).

3.19 Since 2009, this positive net absorption rate has led to a declining vacancy rate – from 6.8% in 2009 to 3.4% in 2018. However, since 2018 the vacancy rate has risen slightly as more stock comes onto the market than is taken-up.

Figure 3.6: Net Absorption and Vacancy of Office Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

Vacancy and Rents by Authority Area

3.20 To understand the relative strength of the office market between the authority areas within Coventry and Warwickshire, 2019 and 2021 vacancy rates and rental prices have been gathered and are presented in the table below. Comparing between the 2019 and 2020 vacancy rates provides an

⁷ Some vacant space is required to facilitate moves within a functioning market – typically 7.5%

indication of the impact of Covid-19. Coventry has been broken into Coventry Central (the City Centre) and Coventry Fringe given the significant differences in the office markets of these two areas.

Table 3.1 Vacancy Rates and Rents by Authority Area, 2019 and 2021

	Vacancy Rate (2019)	Vacancy Rate (2021)	Rental price per sqft (2019)	Rental price per sqft (2021)
Coventry Central	5.40%	6.10%	£11.75	£15.72
Coventry Fringe	1.70%	6.10%	£15.84	£16.26
North Warwickshire	5.70%	5.20%	£15.25	£14.56
Nuneaton and Bedworth	1.20%	5.00%	£10.09	£15.98
Rugby	2.30%	1.70%	£11.36	£11.04
Stratford Upon Avon	3.70%	2.80%	£12.24	£12.92
Warwick	4.40%	6.30%	£16.60	£17.73
Coventry and Warwickshire	3.50%	5.30%	£14.92	£16.05
UK	4.80%	7%	£27.17	£26.91

Source: CoStar Commercial Property Data.

- 3.21 In 2019 the vacancy rate across Coventry and Warwickshire was just 3.5%. This is lower than what it generally deemed appropriate for effective functioning of the market (to allow for churn and new demand). It can be seen that in 2019, Coventry Central, North Warwickshire and Warwick had a higher rate of vacancy than Coventry and Warwickshire as a whole, whereas the vacancy rate in Coventry Fringe and Stratford upon Avon was lower.
- 3.22 Between 2019 and 2021, the vacancy rate increased across the study area as a whole to 5.3% (albeit to a level still likely to be lower than optimal). It increased in the main office markets of Coventry and Warwick/Leamington to around 6%. The evidence does not however point to an excess vacancy at the current point; albeit that there is some prospect that this could rise further in the short-term.
- 3.23 CoStar's latest data (as at September 2022) points to some further growth in the vacancy rate which has risen to 6.2% at the sub-regional level, in particular as companies have downsized their floorspace volumes. This is the highest vacancy rate since 2013. Better quality space is more strongly in demand – with evidence of a 'flight to quality.' CoStar nonetheless report that technology is a key growth area, in particular with the 'Silicon Spa' games development cluster in Leamington Spa. Major lettings in this area include the pre-let to Sumo Group of 44,000 sq.ft at Bedford Street Studios in May 2022.
- 3.24 Recent leases from tech companies include Tata Consultancy Services signing for 21,800 sq.ft at Aura in May 2021, while Zipabout agreed for 3,300 sq.ft at Chapel Court in April 2021, both in

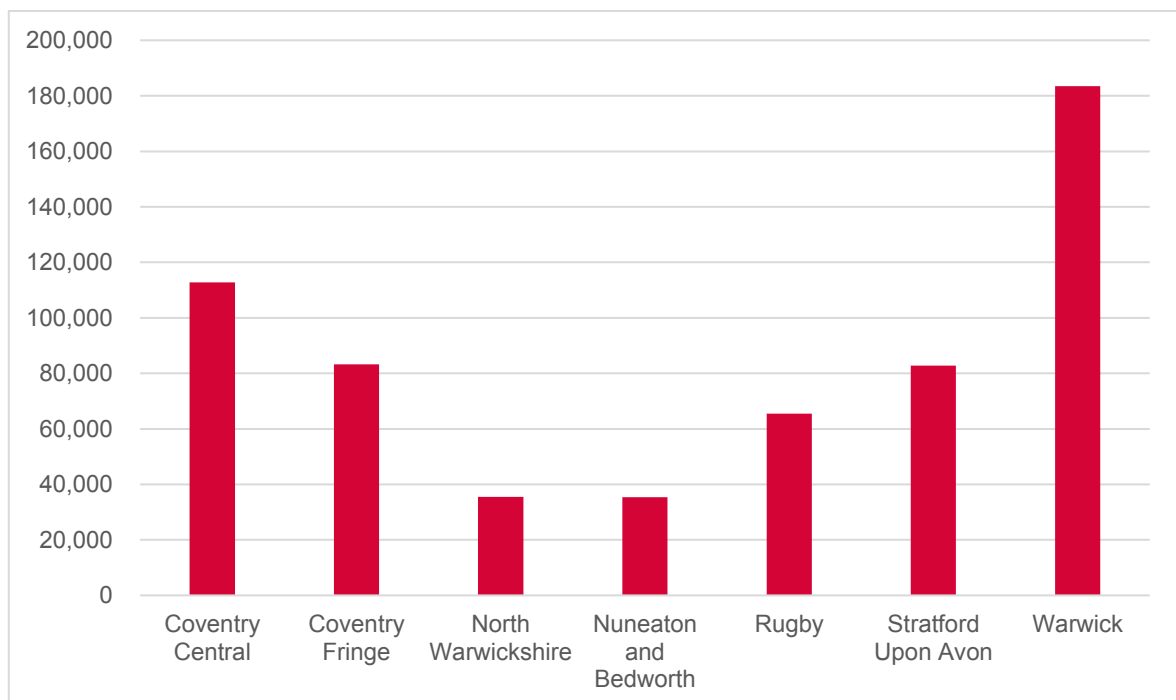
Leamington Spa. Elsewhere, Widgit Software leased 4,650 sq.ft at Bishops House in August 2021. Serco leased 34,000 sq.ft at The Quadrant in Coventry on a nine-year lease term in April 2022.

3.25 Rental prices in Coventry and Warwickshire are much lower than the UK average⁸. The strongest markets are Warwick/Leamington and Coventry, with headline rents of around £25 psf currently at Friargate in Coventry City Centre, and £21 psf at Tachbrook Park in Leamington Spa (in 2021). A combination of values and the market sentiment means that no speculative development is currently taking place. Beyond these core markets, values are insufficient to support speculative office development. CoStar report that rental growth has turned negative during the 2021/22 period but growth is expected again in the coming months but not at the face seen in previous years.

Gross Absorption by Authority Area

3.26 The figure below shows the gross absorption of office space by authority area between 2009 and 2020. It can be seen the gross absorption is by far highest in Coventry and Warwick/Leamington which are the main office markets. On the other hand the lowest gross absorption of office space took place across North Warwickshire and Nuneaton and Bedworth.

Figure 3.7: Gross Absorption of Office Space by Authority Area



Source: Icen Analysis of CoStar Commercial Property Data

⁸ Although this contains London, rents in Coventry and Warwickshire are still relatively low

- 3.27 The table below shows changes in gross absorption over time. It can be seen that gross absorption decreased markedly across the study area between 2009 and 2019; aside from in Coventry Fringe in which gross absorption actually went up as new space was brought forward at locations such as Witley Business Park and Ansty Park. Between 2014 and 2019, gross absorption declined across each authority area but did so to a much less extent in Coventry influenced by the initial phases of the Friargate scheme in the City Centre.
- 3.28 The change between 2019 and 2020 indicates the impact of Covid-19 on demand in each authority area. It can be seen that gross absorption fell significantly across Coventry and Warwickshire as a whole (the exception being in Stratford-upon-Avon).

Table 3.2 Change in Gross Absorption

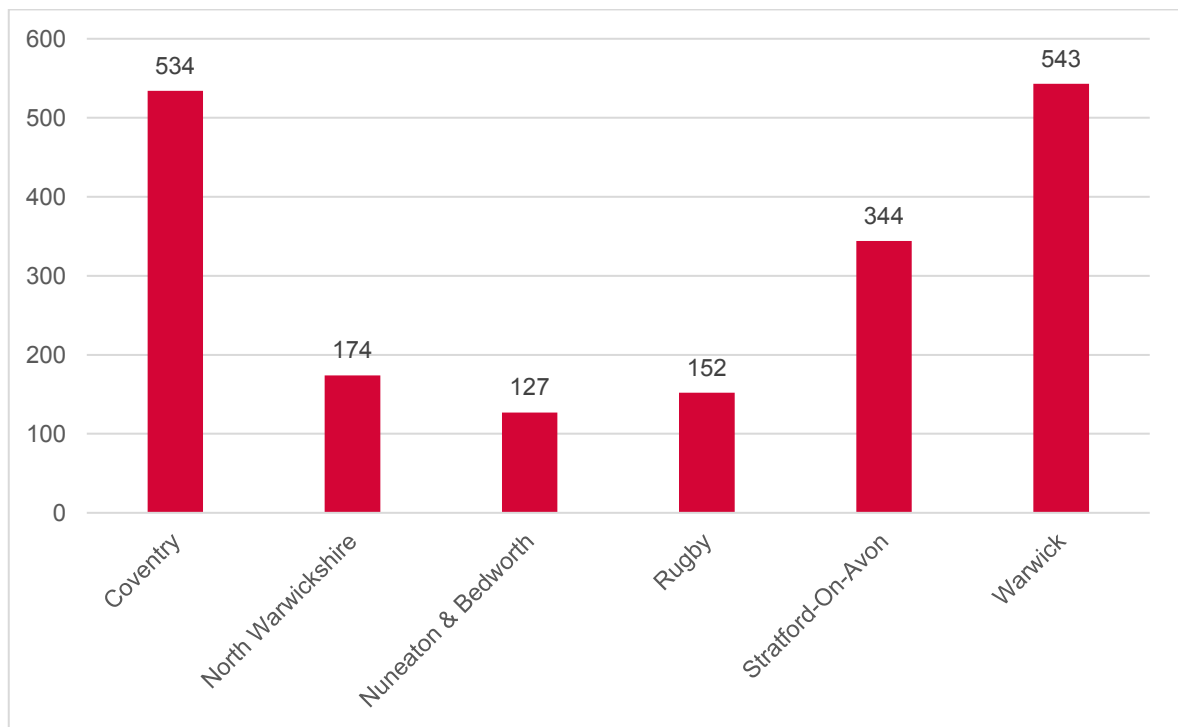
	2009 to 2019 change	2014 to 2019 change	2019 to 2020 change
Coventry Central	-60.9%	-14.2%	-89.8%
Coventry Fringe	9.9%	-17.0%	-93.7%
North Warwickshire	-56.5%	-49.0%	-51.4%
Nuneaton and Bedworth	-84.5%	-59.5%	-26.5%
Rugby	-89.4%	-50.9%	-15.4%
Stratford Upon Avon	-74.4%	-52.2%	48.9%
Warwick	-49.7%	-33.6%	-32.5%
Coventry and Warwickshire	-61.8%	-33.7%	-52.3%

Source: CoStar Commercial Property Data.

Lease Comps by Authority Area

3.29 The figure below shows the volume of office lease activity by authority area over the last 10 years. It can be seen that out of the 1,874 lease completions in Coventry and Warwickshire, 534 were in Coventry (at least 227 of which were in Coventry Central, likely to be around half) and 542 were in Warwick again highlighting the role of these areas as the main office markets.

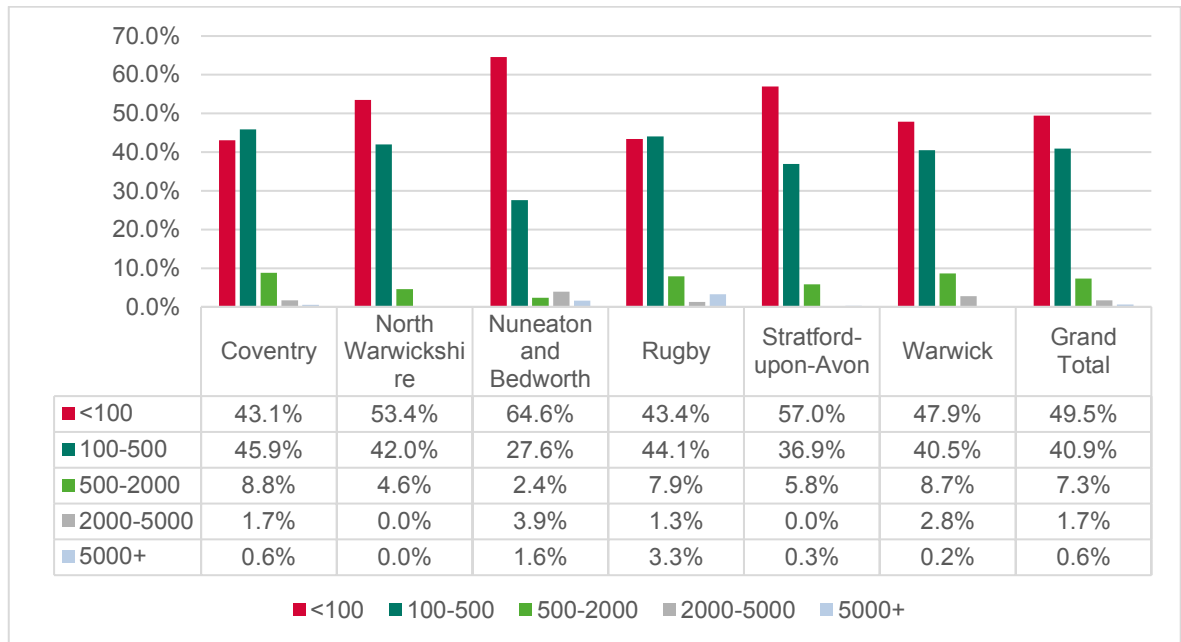
Figure 3.8: Office Lease Completions by Authority Area



Source: CoStar Commercial Property Data.

3.30 The figure below shows the proportion of offices leased by size band in each authority area over the last ten years. It can be seen that the vast majority of office leases were of space below 500 sqm (~90%). Coventry, Rugby and Warwick have a larger proportion office space leases (greater than 500 sqm). Looking at incomplete data on the split between Coventry Central and Coventry Fringe, there is a slightly higher percentage of office spaces under 100 sqm in Coventry Central and a slightly higher percentage of larger office spaces in Coventry Fringe.

Figure 3.9: Offices Leased by Size Band (sqm) and Local Authority 2012-2021



Source: IcenI Analysis of CoStar Commercial Property Data

Office Availability

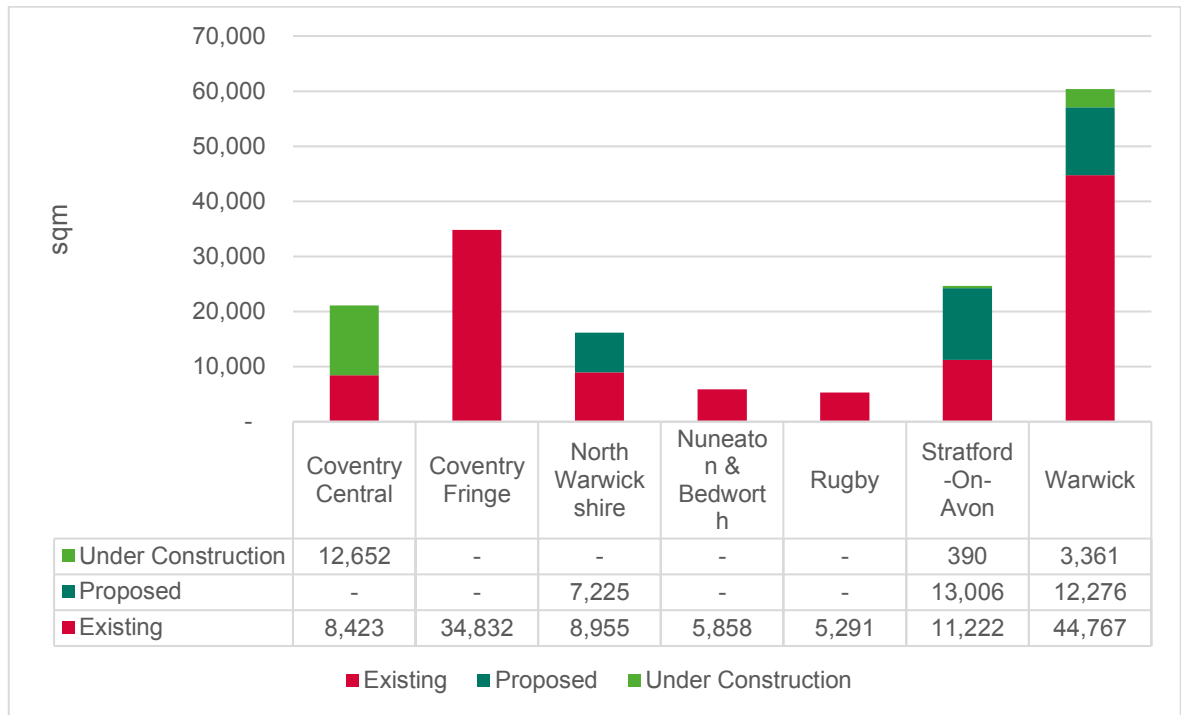
- 3.31 The figure below shows the current available and pipeline office space⁹ in each authority area as at mid 2021, broken down by status (existing, proposed¹⁰ and under construction).

- 3.32 It can be seen that Warwick has the most available office floorspace, the majority of which is existing, with some proposed and a small fraction under construction. There are very low levels of available floorspace in Nuneaton and Bedworth, Rugby and North Warwickshire and Stratford-on-Avon – i.e. beyond the main office markets in the sub-region.

⁹ Co-star data on the 29/07/21

¹⁰ Land considered for a particular future use or a building that has been announced for future development. The project is not expected to start construction in the next 12 months.

Figure 3.10: Office Floorspace Availability (sqm) by Local Authority and Status



Source: Icen Analysis of CoStar Commercial Property Data

- 3.33 The figure below shows the number of offices available by size band and broken down by status. It can be seen that office space between 100 and 500 sqm has the largest availability. Availability then decreases with size.
- 3.34 It can be seen that a significant proportion of available larger office buildings (2000+ sqm) are proposed – 25% of that between 2,000 and 5,000 sqm and 2 out of 3 above 5000 sqm (the other being under construction).

Figure 3.11: Office Availability by Size and Status



Source: IcenI Analysis of CoStar Commercial Property Data

3.35 The table below shows the split of office space in each authority area by Building Class¹¹. It can be seen that only 11.2% of space is Class A all of which is in Stratford-On-Avon (over half this authorities space is Class A) and Warwick. Most space is Class B – 87.3% across Coventry and Warwickshire as a whole but nearly all in Coventry, North Warwickshire and Nuneaton and Bedworth. Only 1.5% of space across the study area is Class C. However, in Rugby 14.4% of space in Class C pointing to a potential surplus of older/dated space. This reflects build space on the market as at Dec 2020.

¹¹ The office building class designation is a way of differentiating buildings of the same building type into different categories of quality. These classes represent a combination of a subjective and objective quality rating of buildings that indicates the competitive ability of each building to attract similar types of tenants. Assigning class codes allows us to compare individual buildings within a market as well as across markets, and also to compare office market conditions between areas in peer groups. For the purposes of comparison, CoStar groups office buildings into four classes. The options are Class A, B, C, or F, with assignment depending on a variety of building characteristics, such as total rentable area, age, building finishes and materials, mechanical systems standards and efficiencies, developer, architect, building features, location/accessibility, property manager, design/tenant layout, and much more. Once assigned, a building's class reflects not only characteristics and attributes evaluated objectively, but also the subjective evaluations of finishes and amenities (CoStar Glossary).

Table 3.3 Availability in City Centre and Out-of-Town Markets, Dec 2020

	Class A	Class B	Class C
Coventry Central	0.0%	100.0%	0.0%
Coventry Fringe	0.0%	99.8%	0.2%
North Warwickshire	0.0%	98.8%	1.2%
Nuneaton & Bedworth	0.0%	97.3%	2.7%
Rugby	0.0%	85.6%	14.4%
Stratford-On-Avon	52.8%	45.3%	1.9%
Warwick	9.6%	88.9%	1.6%
Overall	11.2%	87.3%	1.5%

Source: IcenI analysis of CoStar Commercial Property Data

Agent Feedback

- 3.36 IcenI has engaged with Coventry-based commercial property surveys, Holt Commercial, to further understand current market dynamics. At the time of writing in August 2021 the market is characterised by significant uncertainty and as a result very limited levels of market activity. Occupiers are unsure of future working patterns and the impact on demand for space from growth in home working (2-3 days per week at home); whether staff will hot desk or require dedicated/more space; and meeting room requirements as how these factors interact will influence future space requirements. As a result activity is low, albeit the volume of inquiries is showing some signs of growing.
- 3.37 Holt Commercial report good demand for serviced office space in the core markets, with schemes such as Friars House in Coventry City Centre performing well. No new-build development is however coming forwards.
- 3.38 Holt Commercial report limited change in rental levels and little current speculative development activity, which is consistent with the above analysis of growing availability. With One Friargate completed in Coventry City Centre, development of Two Friargate has started which provides 136,000 sq.ft of Grade A Space with floorplates from 11,000 sq.ft. We understand that two of the 12 floors are pre-let at the current time. No new development activity is evident in the Coventry Fringe office market, with the exception of the replacement of a 2 storey office block at Westwood Business Park with student accommodation. Within the City Centre, Coventry Point (c. 1m sq.ft) has been demolished to be replaced by student development.
- 3.39 At Tachbrook Park in Leamington Spa, a new 60,000 sq.ft European HQ has been delivered for Tata Technologies Europe Ltd, supporting its relocation from Coventry Technology Park and associated growth. Rents were c. £21 per square foot (psf). Developments in the pipeline include the conversion of the former House of Fraser store in Leamington to provide over 60,000 sq.ft of Grade A offices,

which is expected to be completed in October 2022. Plato Close, Tachbrook Park in Warwick is due to deliver 40,000 sq.ft of office space in Spring 2023.

- 3.40 Beyond these core markets, occupier interest is limited and development is likely to require a pre-let at a premium, or development to be subsidised by higher value uses such as residential.
- 3.41 The two universities have continued to grow, supporting demand for space in the main science and technology park sites; but there are impacts associated with Covid-related restrictions on overseas students.

Office Market – Summary and Key Points

The office market has been weakened Covid-driven shift towards homeworking and associated uptake of virtual communication technologies is likely to have some impact on future requirements with a range of companies likely to support at least part-time working from home. Whilst this may be in part offset by changing use of office space and associated layouts, it is likely to have some downward impact on future office floorspace needs. It can also be expected to drive a flight towards good quality space.

There is evidence vacancy levels in the office market rising in the short-term, which could limit new-build development activity; albeit that the starting point in 2020 was of very low availability of space. Older, poorer quality space could be difficult to relet.

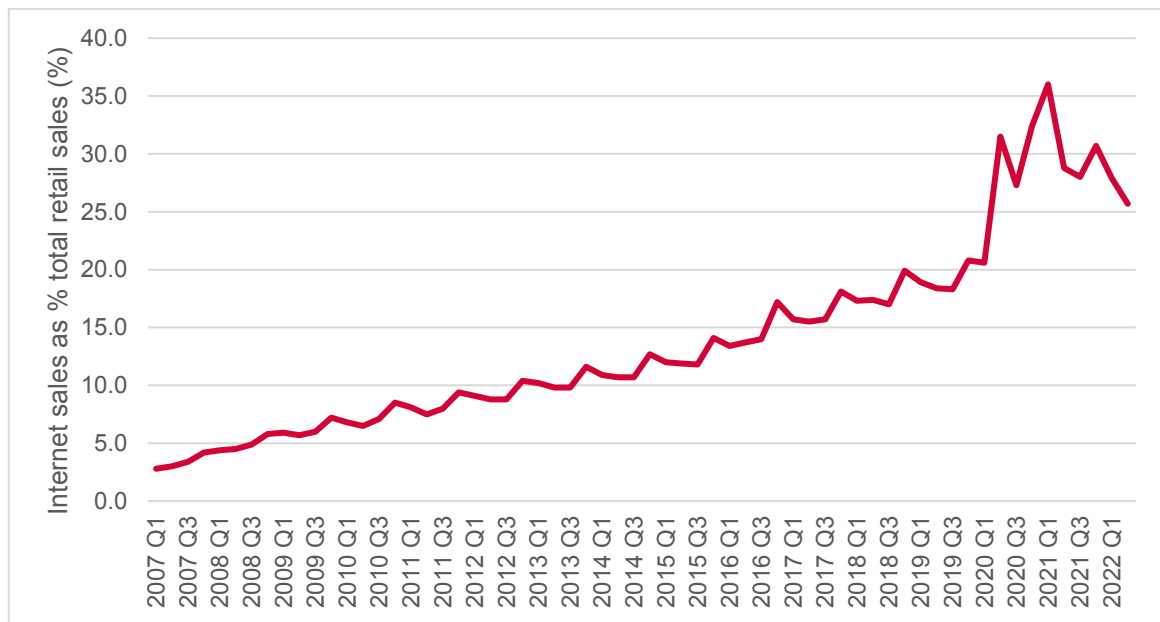
The evidence clearly indicates that the core office markets are Coventry and Leamington/Warwick and we would expect future office supply to be focused on these. Beyond these markets, rental levels mean that delivery of office floorspace is commercially challenging and may require cross-subsidy and/or public sector support/intervention. Policy support may however have a role in supporting job creation in higher value activities.

Industrial Market Overview

- 3.42 The pandemic and the UK's exit from the EU have evidenced the important role of the logistics sector to keep food and goods moving. 2021 is expected to bring further focus on building more resilient supply chains, increasing stocks and diversifying suppliers to prevent future disruptions. This restructure of logistics networks will require additional warehousing space in the UK.

3.43 The market for logistics space is being buoyed by expanding demand from online retailers who are benefiting from the lasting effects of COVID-19 in consumer behaviour. Retailers wanting to preserve market share will need to continue to secure warehouse space to expand their online channels. The graph below shows national trends in the volume of internet sales – i.e. e-retailing. There is a clear upward trend here, and the level of e-retailing pre-pandemic had grown to over 20% sales (with the current position as at July 2022 having settled at 25.3%). This compares to a figure of around 12% in 2015 and 7% in 2010.

Figure 3.12: Growth in Internet Retail Sales – UK



Source: ONS

3.44 CBRE report that the second half of 2020 saw occupiers opting for longer leases compared to the reactive short-term contracts seen in the second quarter. In 2021 they expect longer commitments for the renewals of those short-term leases in most cases, and occupiers reverting to their planned expansions.

3.45 Savills Big Sheds Briefing (Jan 2021) reports that 2020 broke all previous records with new leases signed for 50.1 million sqft of warehouse space, 12.7 million sqft ahead of the previous record set in 2016 and comprising 165 separate transactions, breaking the previous record of 163 set in 2014. Whilst it is important to say that a large proportion of this space was leased to Amazon (25%) with a number of leases on terms less than five years (12%), take-up would still break new records even if Amazon and short-term deals were removed from the time series. Another key trend in 2020 has been the surge in the take-up of units over 500,000 sqft, with 25 deals recorded, making it the highest year since Savills records began and also more than the previous two years combined. Given the

number of businesses currently in the market for units over 500,000 sqft, this is a trend was expected to continue into 2021. 2021 overall has seen this trend of strong take-up of industrial space continue.

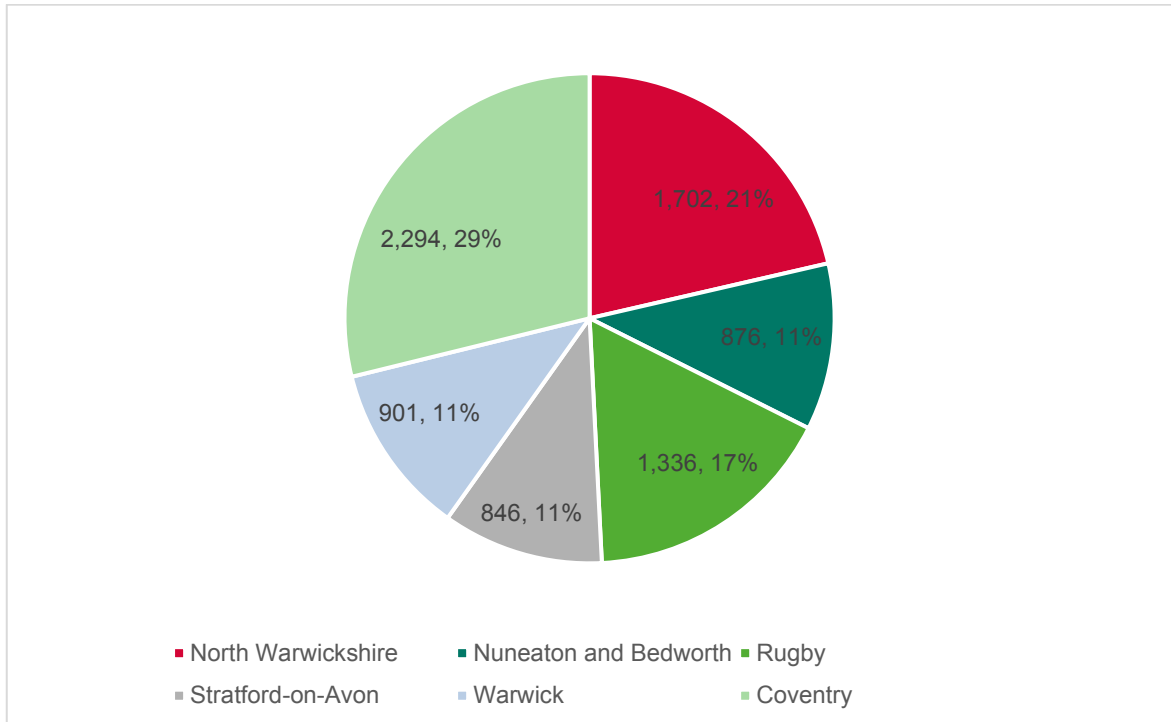
- 3.46 Other influences on market demand include increased stock holding requirements, influenced by Brexit and other factors influencing trade, as well as demand for modern floorspace which aligns with companies' ESG requirements, is energy efficient and has sufficient power capacity, including to facilitate increased automation.
- 3.47 In May 2021, Cushman and Wakefield reported that the industrial and logistical sector showed continued its 2020 momentum in Q1 2021, with a 115% increase in take-up on Q1 2020 and 55% rise on the ten-year average. They also reported that retail, parcel delivery and third part logistics accounted for 70% of quarterly take-up. Looking forward, Cushman and Wakefield predict that 2021 will be another strong year for logistics. More recent market evidence points to continues strong take-up across core markets.

Coventry and Warwickshire Industrial Market

Industrial Stock

- 3.48 VOA data shows that in the year 2019/20 the Study Area had 7,800 industrial properties providing 7,955,000 sqm of industrial floorspace in total. This represents 17.5% of the industrial floorspace across the West Midlands. This suggests that the Study Area has a relatively large industrial sector given its working age population only makes up 16.2% of that of the West Midlands.
- 3.49 The figure below shows that industrial floorspace is relatively spread out across the authorities within Coventry and Warwickshire (albeit with a greater concentration in Coventry and the north than South Warwickshire). However, Coventry supports the largest proportion of the Study Area's industrial market (29%) with North Warwickshire also supporting over 20%.

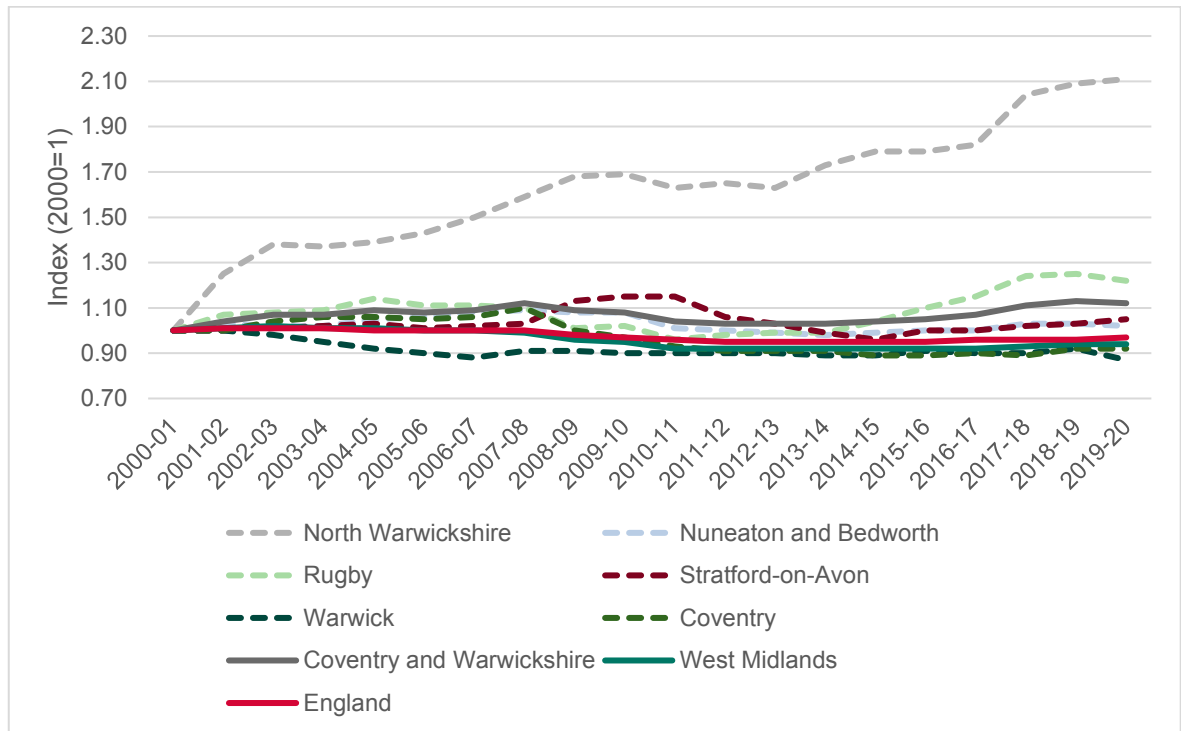
Figure 3.13: Industrial Floorspace by Local Authority 2019/20 (Thousands of sqm; %)



Source: VOA: Non-domestic rating: stock of properties including business floorspace, 2020

- 3.50 The figure below shows the change in the amount of industrial floorspace. Over the last 20 years, the amount of industrial floorspace grew by 12% across Coventry and Warwickshire. This was particularly driven by a 111% growth in North Warwickshire (influenced by development at Birch Coppice in particular) but large growth of 22% also took place in Rugby.
- 3.51 Between 2015 and 2020 the volume of space also grew 1 million sq.ft, out-pacing the ~2% growth regionally and nationally. This growth was again driven in particular by growth of 18% across North Warwickshire and 11% across Rugby.

Figure 3.14: Indexed Industrial Floorspace by Local Authority 2010/11 – 2019/20



Source: VOA: Non-domestic rating: stock of properties including business floorspace, 2020

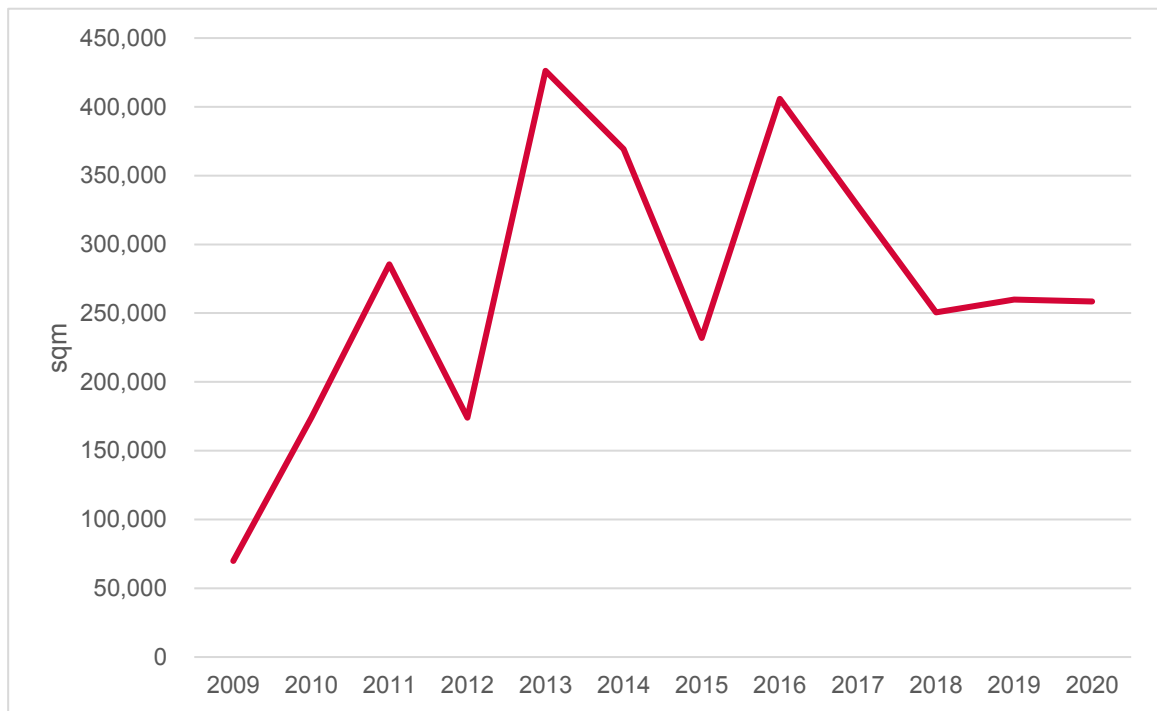
3.52 More recent data indicates that the industrial stock has grown further, to 8,2 million sq.m in 2022. The last 10 years (2012-22) has therefore seen 11.3% growth in industrial floorspace within the sub-region. Over the last 5 years, the strongest increases have been in North Warwickshire and Rugby (291,000 and 179,000 sq.m respectively), with industrial floorspace only falling in net terms in Coventry.

Absorption, Delivery and Vacancy Trends

3.53 As stated above, gross absorption is the amount of space which has become physically occupied (moved in to). It provides an indication of the strength of the market but does not take into account the amount of space vacated. It indicates take-up of space (both new-build and existing).

3.54 The figure below shows that gross absorption increased across Coventry and Warwickshire between 2009 and 2020. Average gross take-up (absorption) of industrial space over the 2013-20 period has been 316,300 sq.m per annum.

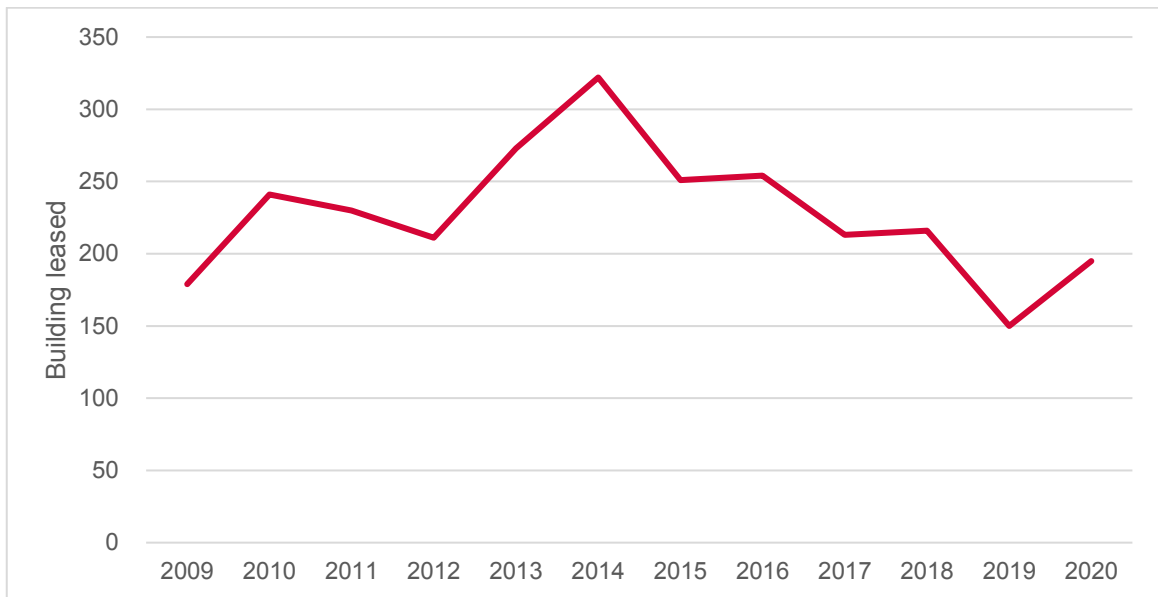
Figure 3.15: Gross Absorption of Industrial Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

3.55 To supplement gross absorption data (amount of space moved in to), lease completions data has also been analysed to help paint a picture of demand for industrial space without taking into account the size of leases/move ins. This is a measure in effect of market activity. It shows a strong recovery in the market in 2013/14 following the previous recession; with lower market activity in 2019/20 likely in part influenced by Brexit-related uncertainties. The pattern is similar to that for gross absorption.

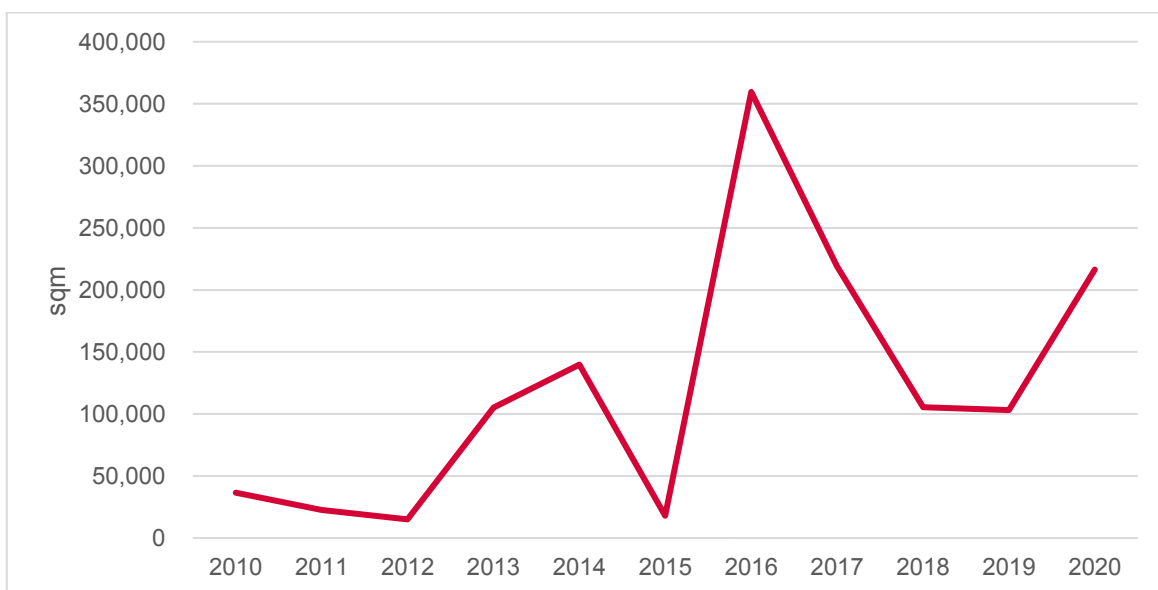
Figure 3.16: Lease Completions for Industrial Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

- 3.56 Co-star data suggests that there was around 1,340,000 sqm of net new industrial floorspace delivered between 2010 and 2020 which is evidently a very significant volume; of which 1,021,000 sq.m has been delivered over the 2015-20 period. As can be seen in the figure below, net deliveries (the balance between new-build construction and losses) have been varied greatly over this period and 578,00 sqm of these net deliveries came in 2016 and 2017.

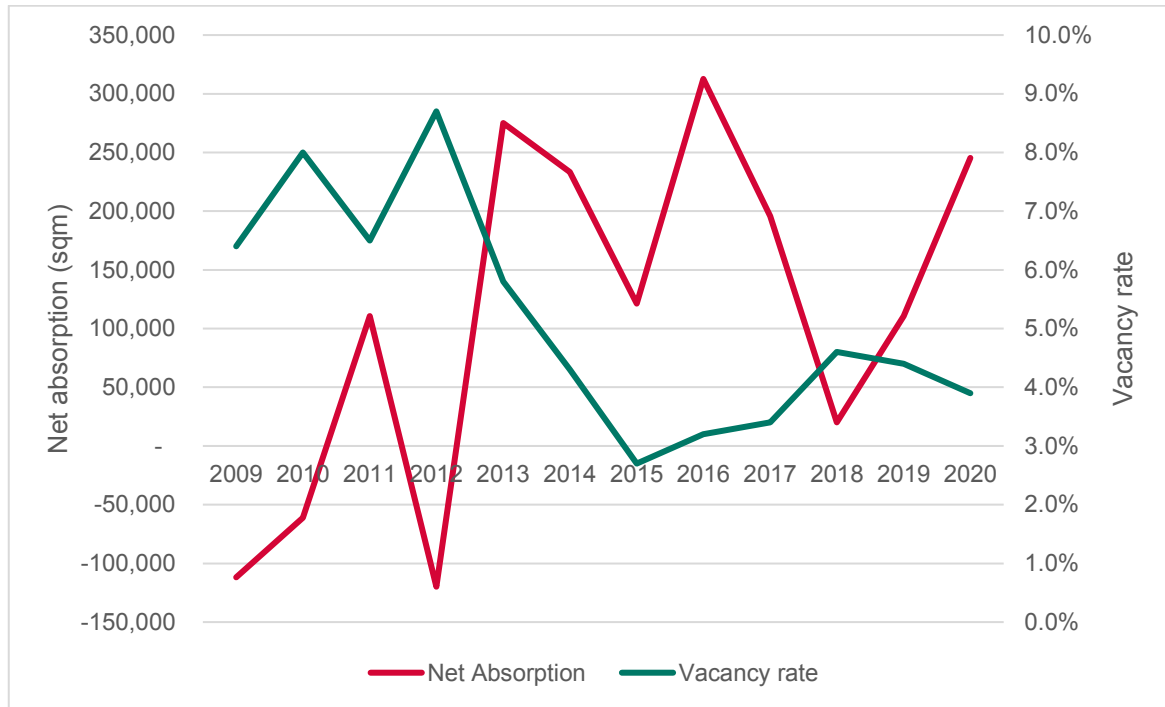
Figure 3.17: Net Deliveries of Industrial Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

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- 3.57 As stated above, CoStar provides data on net absorption which describes the net change in physically available space which is calculated by deducting the space vacated by tenants and made physically available within the local market from the total space which becomes physically occupied and is lost (e.g. through demolition). Therefore, net absorption indicates that net change in demand relative to supply of space. A positive net absorption figure means that the proportion of vacant space is falling, whilst a negative level indicates that more space was coming onto the market than being taken-up/lost.
- 3.58 The figure below shows absolute net absorption and vacancy rates across Coventry and Warwickshire between 2009 and 2020. It can be seen that between 2009 and 2020, overall net absorption was 1,332,000 sqm. This suggests strong demand relative to the supply of office floorspace. Net absorption was low (and generally negative) between 2009 and 2012 before rising and peaking at over 300,000 sqm in 2016. Since then net absorption fell before rising to around 250,000 sqm in 2020.
- 3.59 Since 2012, the positive net absorption rate has contributed to a declining vacancy rate – from 8.7% in 2012 to 2.7% in 2015. When net absorption is positive, the vacancy rate would be expected to decrease. However, as can be seen in the figure below, the vacancy rate increased by around 1 percentage point between 2015 and 2020 despite positive net absorption. This may be due to the fact that newly delivered space is counted in the vacancy rate calculation before it is counted within the net absorption calculation (Co-star states that space becomes part of the inventory, and hence the denominator in the calculation of the vacancy rate, when it is suitable for occupancy). Nonetheless, the level of vacant space at under 4% in 2020 is low and points to a continuing need for delivery of new industrial floorspace.
- 3.60 Net absorption of industrial space has averaged 189,300 sq.m per annum over the 2013-20 period, with the five year average slightly lower at 167,600 sq.m, across Coventry and Warwickshire.

Figure 3.18: Net Absorption and Vacancy of Industrial Floorspace across Coventry and Warwickshire, 2009-2020



Source: CoStar Commercial Property Data

Vacancy and Rents by Authority Area

3.61 To understand the relative strength of the industrial market between the authority areas within Coventry and Warwickshire, 2019 and 2021 vacancy rates and rental prices have been gathered and are presented in the table below. Comparing between the 2019 and 2020 vacancy rates provides an indication of the impact of Covid-19.

Table 3.4 Vacancy Rates and Rents by Authority Area, 2019 and 2021

	Vacancy Rate (2019)	Vacancy Rate (2021)	Rental price per sqft (2019)	Rental price per sqft (2021)
Coventry	7.1%	2.4%	£5.10	£5.77
North Warwickshire	2.1%	1.2%	£6.48	£6.73
Nuneaton and Bedworth	1.5%	2.7%	£5.65	£6.31
Rugby	4.7%	4.5%	£5.77	£6.49
Stratford Upon Avon	2.7%	8.9%	£4.33	£4.84
Warwick	5.9%	4.9%	£6.62	£6.69
Coventry and Warwickshire	4.4%	3.5%	£5.76	£6.07
UK	3.2%	3.2%	£6.67	£7.24

Source: CoStar Commercial Property Data.

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- 3.62 In 2019 the vacancy rate across Coventry and Warwickshire was 4.4%. This is lower than what is generally deemed appropriate for effective functioning of the market (to allow for churn and new demand). It can be seen that in 2019, Coventry and Warwick had a significantly higher rate of vacancy than Coventry and Warwickshire as a whole, whereas the vacancy rate in North Warwickshire, Nuneaton and Bedworth and Stratford upon Avon was lower.
- 3.63 Between 2019 and 2021, the vacancy rate decreased across the study area as a whole to 3.5% (significantly below optimal levels) but increased in some areas including Stratford upon Avon which subsequently has a vacancy rate of 8.9%. Coventry saw a particularly large decrease in vacancy rate to 2.4% - below the average for the study area as a whole. As at September 2022, CoStar report a 3.2% vacancy rate across the sub-region.
- 3.64 The evidence points to a short-term need to bring forward additional industrial space in the sub-region in the short-term.
- 3.65 Average industrial rents in Coventry and Warwickshire are below the UK average (although this contains London, rents in Coventry and Warwickshire are still relatively low). In 2019, the highest rental prices in terms of average rents recorded by CoStar were in Warwick and North Warwickshire. On the other hand rental prices in Coventry and Stratford upon Avon were significantly below the average for the study area. In Coventry this is likely to be influenced by the quality of some space.
- 3.66 Looking at 2021 to date, rental prices in Rugby have risen significantly and are now roughly significantly above the study area as a whole. CoStar in 2022 report a substantial 9.4% growth in industrial rents over the last 12 months; and described rents having been rising since 2014 with rental growth accelerating since the onset of the pandemic, led by demand for logistics. Robust sentiment towards Coventry's industrial market as well as the wider sector, means investor appetite is at an all-time high.
- 3.67 Prime industrial rents for smaller units (1500 – 2000 sq.ft) currently stand at over £10 psf (as at mid 2021), whilst for big box logistics units (100,000 sq.ft/ 9200 sq.m+), prime rents around Coventry are around £7.50 psf according to Holt Commercial. A dwindling supply has been driving rental growth. For the larger units, rents being achieved are some of the highest in the region, pointing to the strength of the sub-region as a market for big box logistics.

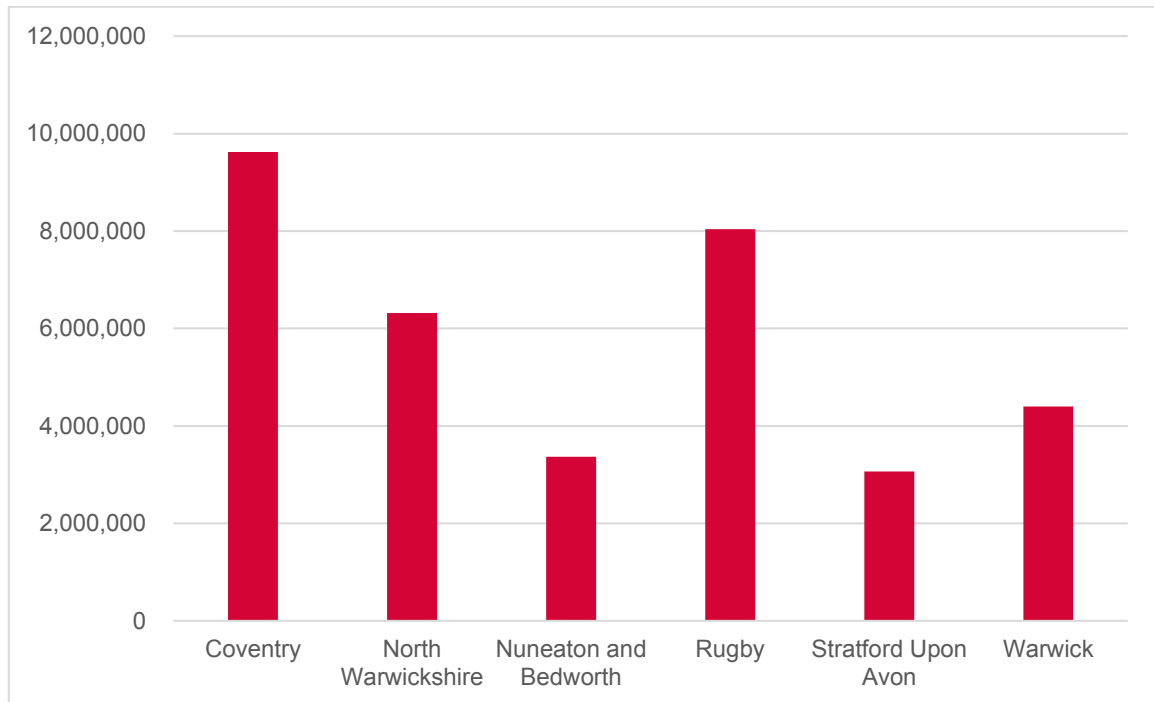
Gross Absorption by Authority Area

- 3.68 The figure below shows the gross absorption of industrial space by authority area between 2009 and 2020. It can be seen the gross absorption is highest in Coventry, closely followed by Rugby, and more generally is focused in the centre and north of the sub-region. On the other hand the lowest gross absorption of industrial space took place across Stratford Upon Avon and Nuneaton and

Bedworth. The low take-up in Nuneaton and Bedworth is however likely in part to have been influenced by supply-side constraints; with the take-up data not really picking up delivery on the allocations made in the 2018 Local Plan.

3.69 Overall the picture is of a greater focus of industrial floorspace demand towards the centre and north of the sub-region.

Figure 3.19: Gross Absorption of Industrial Space by Authority Area, 2009-20



Source: Icen Analysis of CoStar Commercial Property Data

3.70 The table below shows changes in gross absorption over time. It can be seen that gross absorption increased by 272% across the study area between 2009 and 2019. This was driven by substantial growth in Coventry, North Warwickshire, and Warwick.

3.71 The change between 2019 and 2020 indicates the impact of Covid-19 on demand in each authority area. It can be seen that gross absorption fell by just 1% across Coventry and Warwickshire as a whole highlighting the resilience of the industrial market; and the effect of the pandemic in driving growth in warehousing/logistics demand.

Table 3.5 Change in Gross Absorption

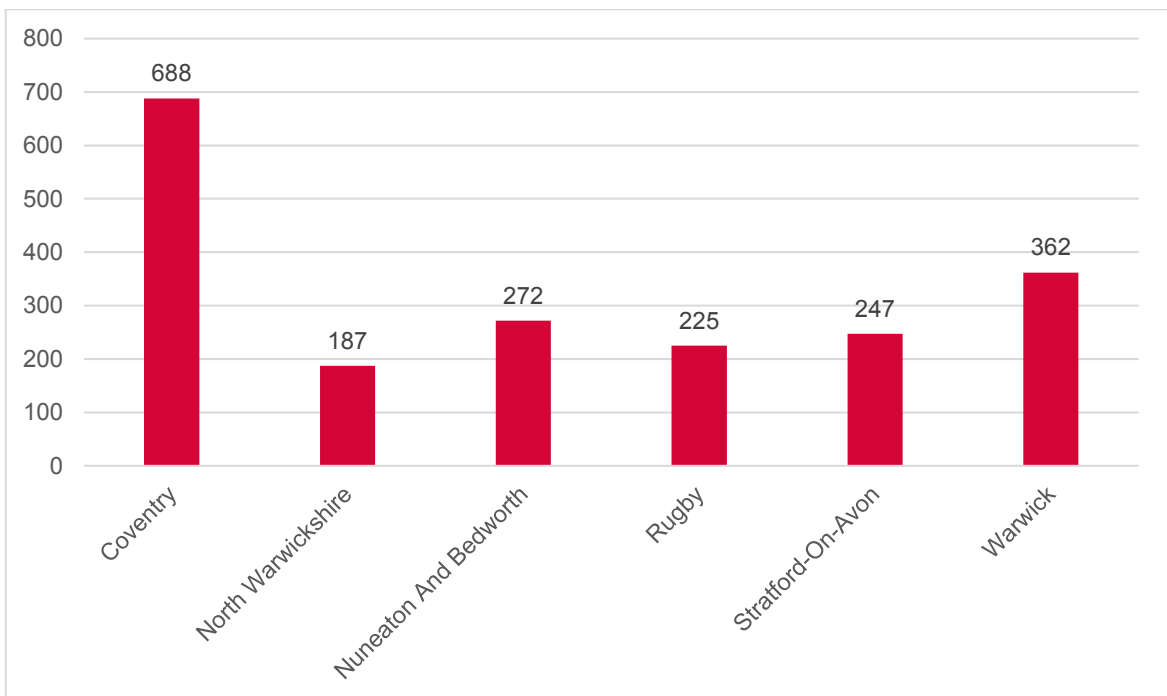
	2009 to 2019 change	2014 to 2019 change	2019 to 2020 change
Coventry	423%	26%	39%
North Warwickshire	541%	-39%	32%
Nuneaton and Bedworth	25%	12%	-45%
Rugby	84%	-86%	200%
Stratford Upon Avon	47%	-73%	-60%
Warwick	901%	103%	-81%
Coventry and Warwickshire	272%	-30%	-1%

Source: CoStar Commercial Property Data.

Lease comps by Authority Area

3.72 The figure below shows the number of industrial lease comps by authority area over the last 10 years. It can be seen that out of the 1,981 lease completions in Coventry and Warwickshire, 688 (around a third) were in Coventry.

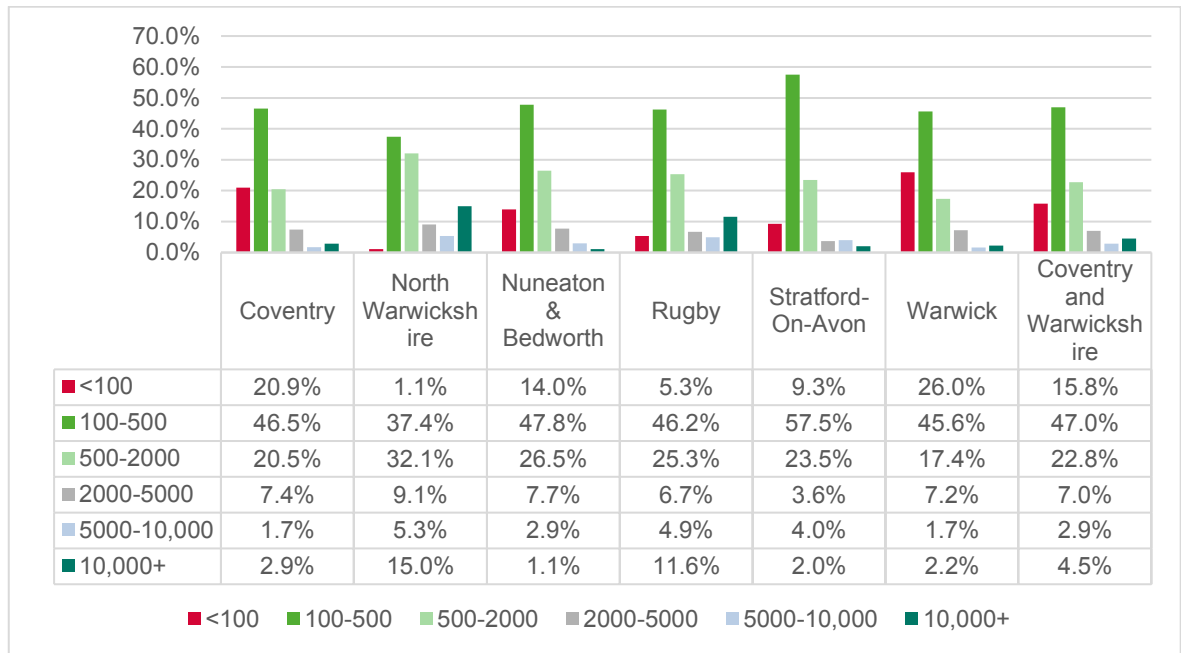
Figure 3.20: Industrial Lease Completions by Authority Area



Source: CoStar Commercial Property Data.

3.73 The figure below shows the proportion of industrial units leased by size band in each authority area over the last ten years. It can be seen that nearly half of industrial leases were of space between 100 and 500 sqm. North Warwickshire had a particularly high percentage of large leases – 15% of its leases were for space greater than 10,000 sqm in size.

Figure 3.21: Industrial Units Leased by Size Band (sqm) and Local Authority 2012-2021



Source: Icen Analysis of CoStar Commercial Property Data

Industrial Availability

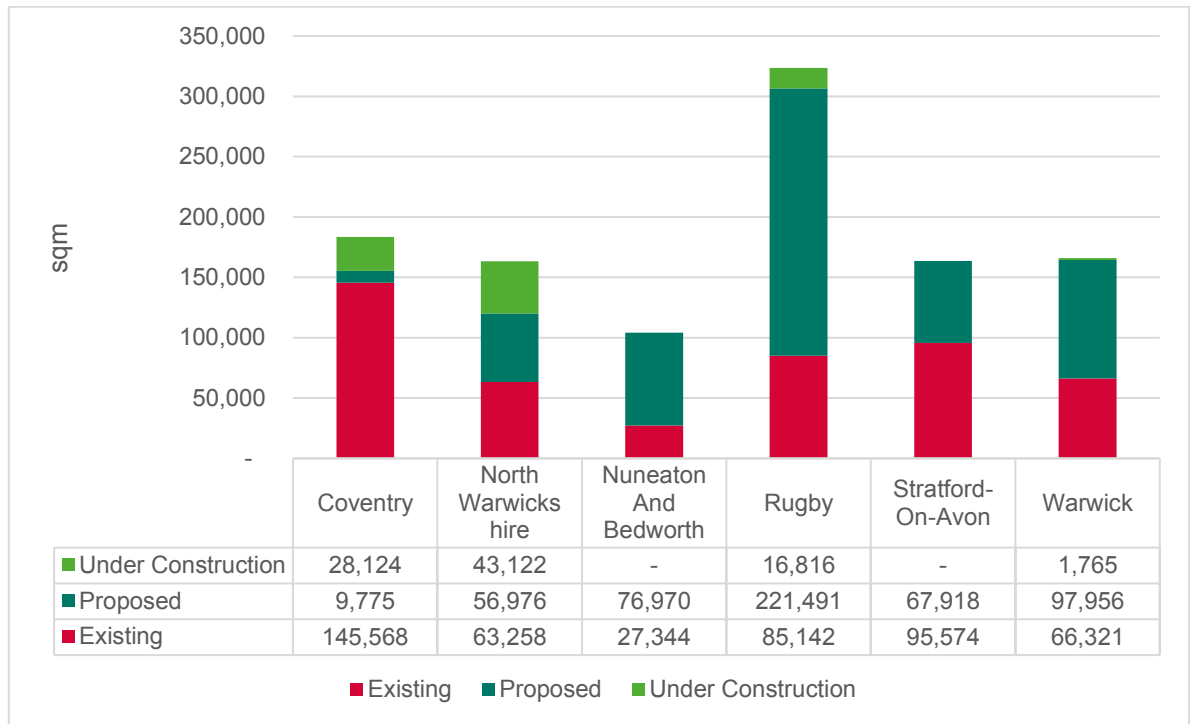
- 3.74 The figure below shows the current available and pipeline industrial space¹² in each authority area, broken down by status (existing, proposed¹³ and under construction). It can be seen that Rugby has the most available/proposed industrial floorspace. Looking at existing and under construction floorspace only, Coventry has the most availability.

- 3.75 There are more modest levels of available/proposed floorspace in Nuneaton and Bedworth. The relatively high volumes of proposed and under construction space highlight the strength of market/developer interest in industrial development within the sub-region.

¹² Co-star data on the 29/07/21

¹³ Land considered for a particular future use or a building that has been announced for future development. The project is not expected to start construction in the next 12 months.

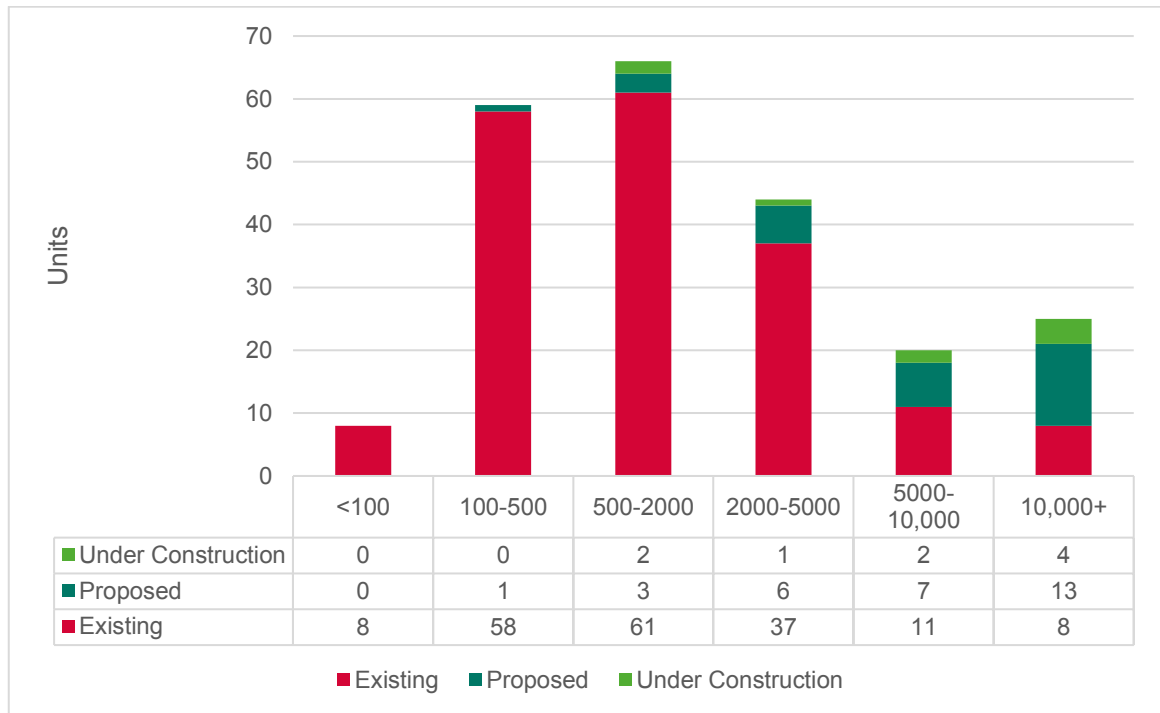
Figure 3.22: Industrial Floorspace Availability (sqm) by Local Authority and Status



Source: Icen Analysis of CoStar Commercial Property Data

- 3.76 The figure below shows the number of industrial units available by size band and broken down by status. It can be seen that industrial space between 500 and 2,000 sqm has the largest availability, closely followed by space between 100 and 500 sqm.
- 3.77 It can be seen that a significant proportion of available larger industrial units (5000+ sqm) are proposed – 35% of those between 5,000 and 10,000 sqm and 52% above 5000 sqm (the other being under construction).

Figure 3.23: Industrial Unit Availability by Size and Status



Source: Icen Analysis of CoStar Commercial Property Data

3.78 The table below shows the split of industrial space in each authority area by Building Class. It can be seen that only 34.1% of Coventry and Warwickshire’s available industrial space is Class A, but with higher levels of Class A space in Rugby and Warwick. Most space is Class B – 61.8% across Coventry and Warwickshire as a whole but nearly all in Coventry and Nuneaton and Bedworth. Only 4.5% of space across the study area is Class C.

Table 3.6 Table 4.2: Availability in City Centre and Out-of-Town Markets, Dec 2020

	Class A	Class B	Class C
Coventry	10.0%	84.8%	5.2%
North Warwickshire	27.9%	71.4%	0.7%
Nuneaton And Bedworth	2.5%	94.0%	3.5%
Rugby	52.7%	46.5%	0.7%
Stratford-On-Avon	23.1%	69.2%	7.7%
Warwick	61.1%	29.2%	9.7%
Coventry and Warwickshire	34.1%	61.8%	4.1%

Source: Icen analysis of CoStar Commercial Property Data

Agent Feedback

3.79 Holt Commercial report very strong current demand for industrial floorspace, a shortage of available stock, and as a result growing rents and significant growth in land values. Yields for big sheds are at record levels of 4% or less.

-
- 3.80 Industrial availability in and around Coventry is currently limited but there are a pipeline of schemes coming forwards (principally in surrounding areas) including 55 acres at Chase Point (within Nuneaton and Bedworth Borough) expected to be marketed late 2021/early 2022. Infrastructure is being delivered to bring forward development at Segro's Coventry and Warwickshire Gateway South scheme with potential for up to 3.6m sq.ft of distribution space; with 180,000 sq.ft being developed by Canmore at Whitley Business Park. There is potential for some further space to be delivered as part of Sustainable Urban Extensions.
- 3.81 Industrial demand is currently strong across size bands across much of the centre and north of the sub-region. Recent schemes at Rugby have performed well, with new big box supply expected to come forwards through Prologis' DIRFT3 and through development of land with outline planning permission at the junction of the A45 and M45 (albeit infrastructure works have yet to be started).
- 3.82 Holt Commercial report limited industrial land supply remaining in Warwick/Leamington, with the principle availability being remaining plots at Tournament Fields and Spa Park. Industrial market activity in Stratford District is lower than in other parts of the sub-region, with limiting remaining available supply at Wellesborne and the main prospective growth focused at Gaydon to support growth of the existing Jaguar Land Rover/ Aston Martin operations.

Industrial Market – Summary and Key Points

The sub-region, and in particular the northern and central parts of it, clearly has a strong and dynamic industrial market. The evidence points to a very significant stock of industrial floorspace at over 8 million sq.m of space and sustained high take-up over the period since 2013. Whilst there are some challenges for the automotive sector, which can be relatively cyclical and has influenced strong take-up in recent years, demand for logistics/distribution space looks likely to remain strong buoyed by the growth in e-retailing in particular. Rents and land values have grown to record levels.

Available industrial space remains low and the strength of demand has supported strong recent development activity together with growth in rents, with a very substantial 1.3 million sq.m of space delivered since 2013 with over 1 million sq.m over the 2015-20 period. Average gross take-up since 2013 has been 316,000 sq.m per annum and whilst this has partly resulted from replacement of older space, net absorption of space has equally been very strong at almost 190,000 sq.m per annum. New supply does appear to be coming forwards, not least as sites allocated in the last round of local plans start to progress, but there will likely be a continuing need to replenish industrial supply over time if economic growth is not to be constrained.

4. HOUSING MARKET DYNAMICS

4.1 In this section we move on to consider housing market dynamics, addressing both the sales and rental markets. This section principally sets out the position as at mid 2021 when this section of the report was originally drafted.

Sales Market

4.2 The median house price across the C&W Housing Market Area was £247,000 considering sales over the year to Dec 2020. This was 5% below the national average. Values however vary within the HMA, with the highest prices in Stratford-on-Avon at £325,000; and the lowest in Nuneaton and Bedworth at £185,000.

Table 5.1: Median House Price, Year to Dec 2020

	Median House Price, Year to Dec 2020	Difference to HMA Average
North Warwickshire	£215,000	-15%
Nuneaton and Bedworth	£185,000	-33%
Rugby	£249,950	1%
Stratford-on-Avon	£325,000	24%
Warwick	£319,134	23%
Coventry	£187,000	-32%
C&W HMA	£247,000	0%
West Midlands	£206,000	-20%
England	£259,000	5%

Source: ONS Small Area House Price Statistics Dataset 9

4.3 House prices have grown over the last 20 years (2000-2020) by an average of 6.9% per annum. This is modestly above average for both the region and nationally and in particular reflects stronger recent house price growth.

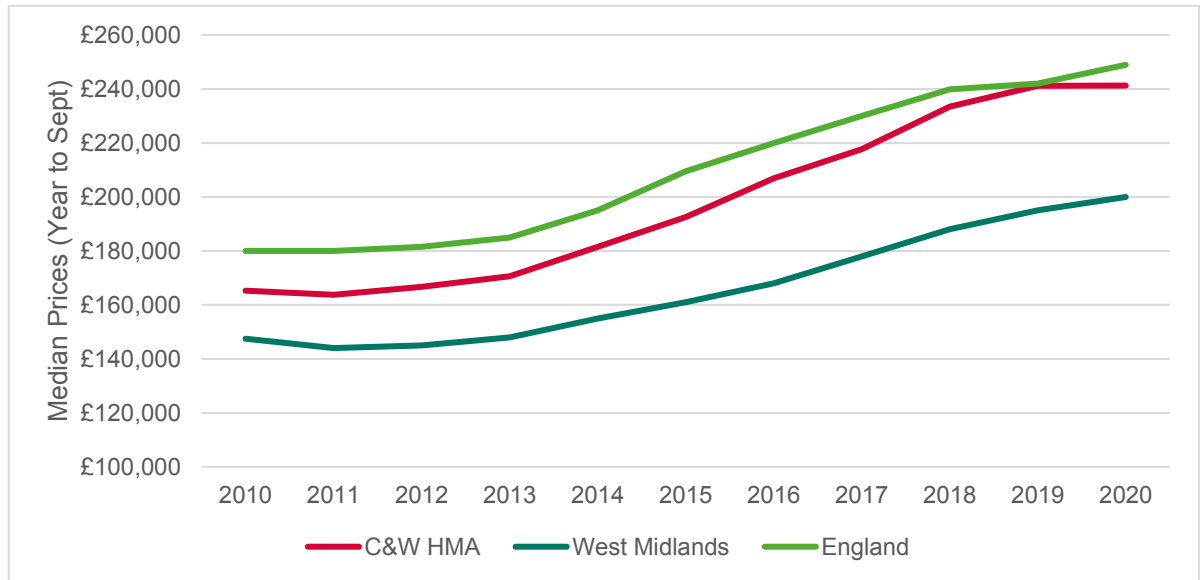
Table 5.2: Annual House Price Growth over different Periods (% CAGR)

CAGR	2005-10	2010-15	2015-20	20 Year
C&W HMA	1.6%	3.1%	4.6%	6.9%
West Midlands	1.0%	1.8%	4.4%	5.7%
England	1.3%	3.1%	3.5%	5.8%

Source: Derived from ONS Small Area House Price Statistics Dataset 9

4.4 As the chart below shows, we have seen stronger house price growth in the HMA relative to the regional and national average since 2013. The median house price in 2020 was £41,000 above the West Midlands average across the HMA.

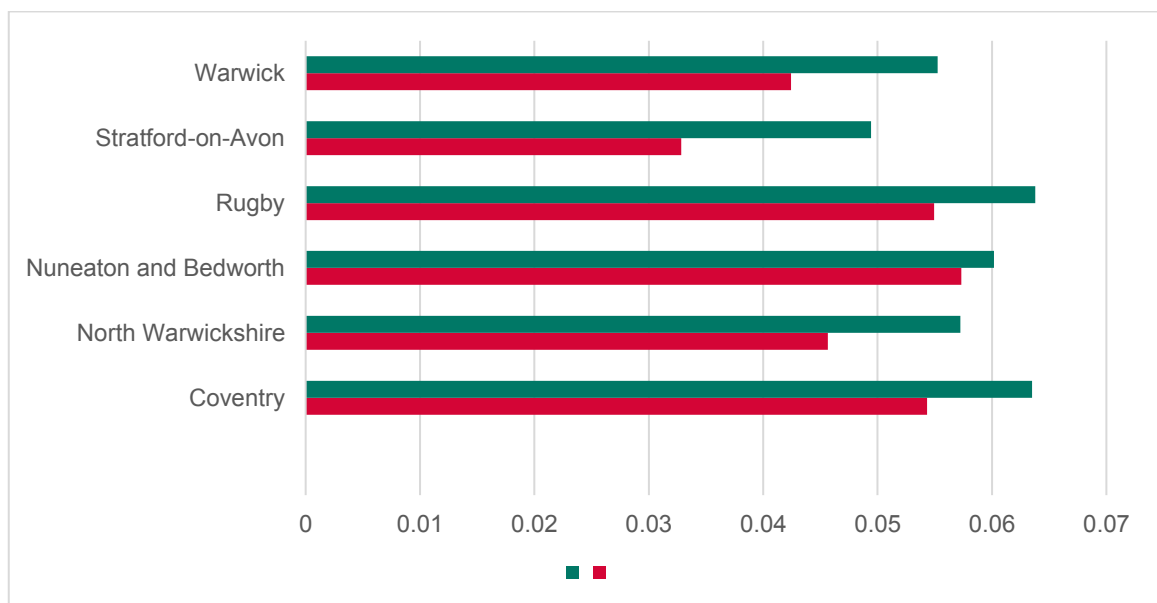
Figure 4.1: House Price Trends in HMA, 2010-2020



Source: Derived from ONS Small Area House Price Statistics Dataset 9

4.5 Within Coventry and Warwickshire, long-term house price growth, looking over the last 20 years, has been strongest in Rugby (at 6.4%+ pa) and weakest in Stratford-on-Avon (4.9% pa). Nuneaton and Bedworth saw particularly strong growth in values over the 2015-20 period (5.7%+ pa).

Figure 4.2: Growth Rates in Median House Prices, to Sept 2020



Source: Derived from ONS Small Area House Price Statistics Dataset 9

4.6 Analysis of actual changes in values also produces interesting results. Over the last 5 years, Warwick and Rugby stand out as having some of the strongest value growth with the median house price growing by £57,750 and £57,500, respectively. In contrast, North Warwickshire, Nuneaton and Bedworth, Stratford-on-Avon and Coventry have all seen value growth that has been weaker than across the West Midlands region, albeit to a moderate degree.

Table 4.1 House Price Growth in C&W Local Authorities

	1 Year	5 Year	10 Year
North Warwickshire	£0	£42,000	£58,000
Nuneaton and Bedworth	£2,500	£45,000	£56,000
Rugby	-£2,500	£57,500	£90,000
Stratford-on-Avon	£0	£47,000	£85,000
Warwick	-£2,750	£57,750	£104,000
Coventry	£3,000	£43,000	£63,000
C&W HMA	£0	£48,700	£76,000
West Midlands	£5,000	£39,000	£52,500

Source: Derived from ONS Small Area House Price Statistics Dataset 9

4.7 Analysis of house prices by type provides a clearer picture of the value geography across the HMA. Warwick District has the highest house prices, with semi-detached properties selling for over £300,000. There are similar values in Stratford-on-Avon with median values for semi-detached properties at around £272,500 and median values for terraced houses at £235,000. Values in Rugby are lower, with median values for semi-detached properties at £232,000 but still have a higher value than the national average. Coventry, North Warwickshire and Nuneaton and Bedworth are then lower with semi-detached values of around £180,000 - £221,500.

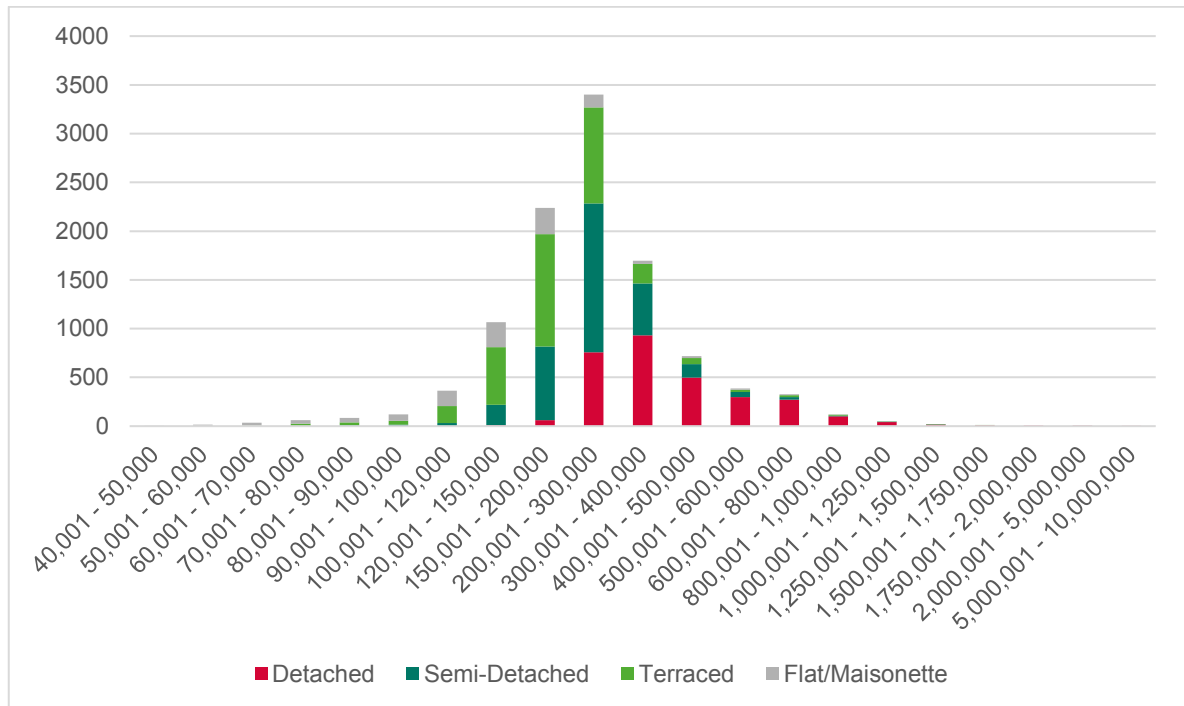
Table 4.2 Median House Prices by Type, Year to Sept 2020

	Detached	Semi-Detached	Terraced	Flat/Maisonette
North Warwickshire	£320,000	£205,000	£159,998	£140,000
Nuneaton and Bedworth	£278,000	£180,000	£138,000	£105,000
Rugby	£350,000	£232,000	£180,500	£122,000
Stratford-on-Avon	£435,000	£272,500	£235,000	£160,500
Warwick	£479,995	£300,000	£270,000	£188,000
Coventry	£313,000	£221,500	£172,000	£128,000
West Midlands	£319,000	£190,000	£159,000	£127,500
England	£350,000	£223,000	£195,000	£216,000

Source: Derived from ONS Small Area House Price Statistics Dataset 9

4.8 The graph below analyses the distribution of property sales by type across the HMA. It shows that most property sales (for the 2020 calendar year) were for properties valued at between £150,000 - £400,000. There is however a level of sales of larger properties – particularly detached – which command higher values still.

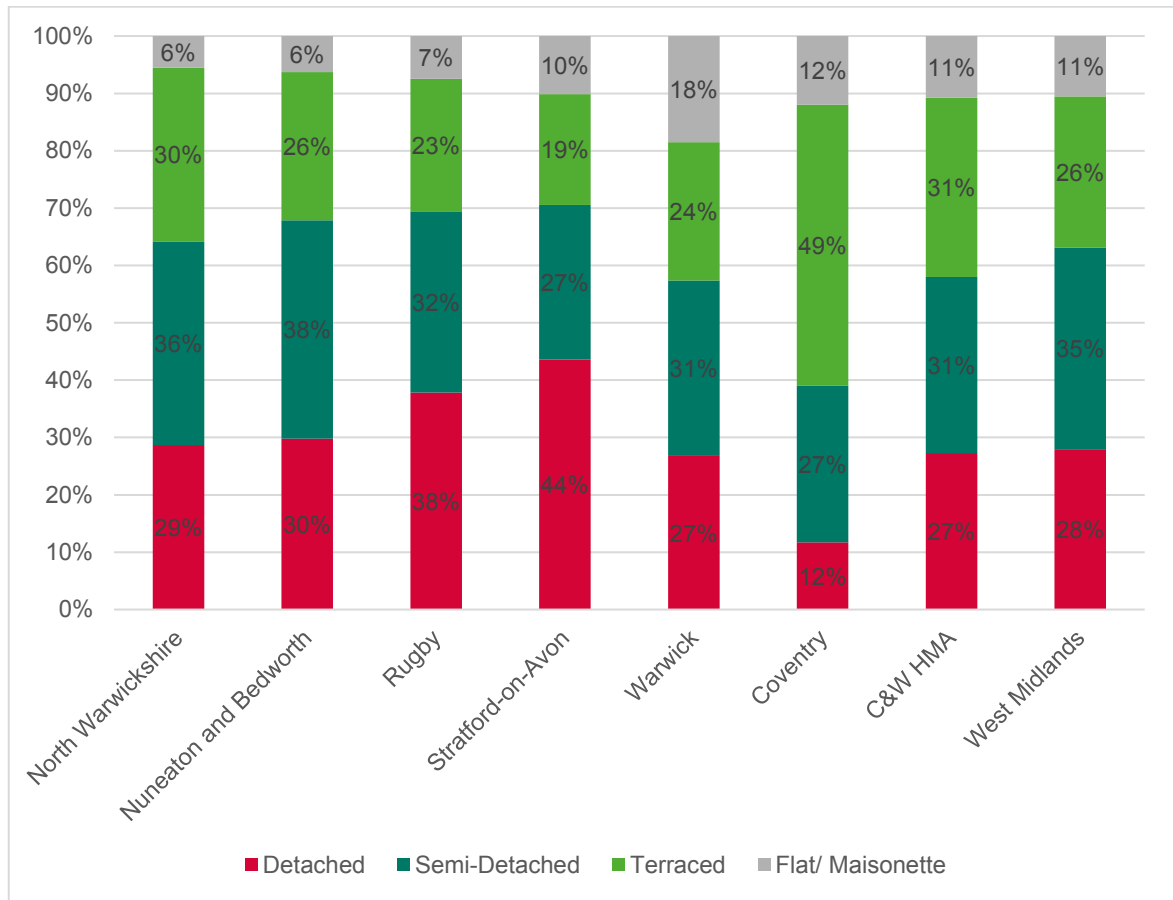
Figure 4.3: Distribution of Sales – Coventry and Warwickshire HMA (2020)



Source: HM Land Registry House Price Index

4.9 The profile of sales by type across the HMA is generally fairly balanced between terraced, semi-detached and detached stock; with a modest volume of flatted sales which accounted for just 11% of sales in 2020. The profile of market demand is thus focused more towards houses. Flatted sales were strongest in Warwick, and to a lesser extent Coventry. Detached sales account for a substantial proportion of overall sales in Stratford-on-Avon District (44%) and Rugby Borough (38%).

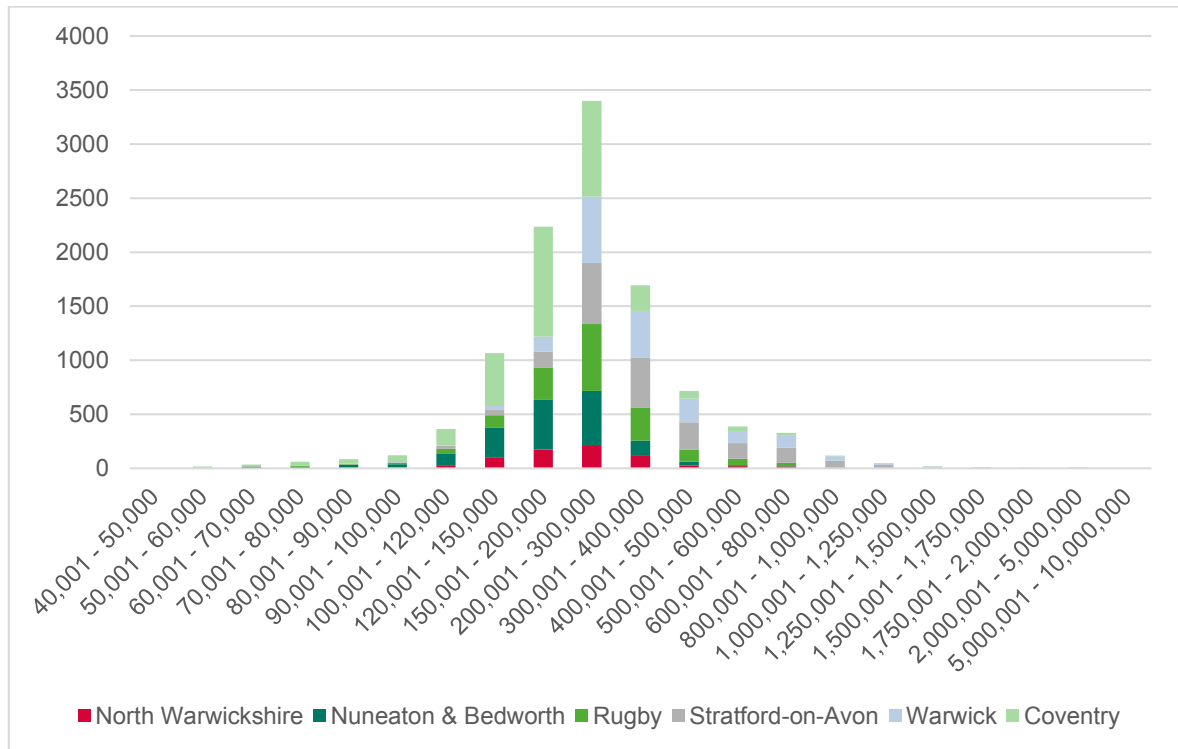
Figure 4.4: Distribution of Sales by Type, Year to Sept 2020



Source: Derived from ONS Small Area House Price Statistics Dataset 6

4.10 The interaction between location and value is shown in the figure below. Sales of properties under £200,000 is focused particularly in Coventry; whereas the majority of sales in Warwick and Stratford-on-Avon District are above this. The distribution of sales in Rugby sits in the middle of those for the sub-region as a whole.

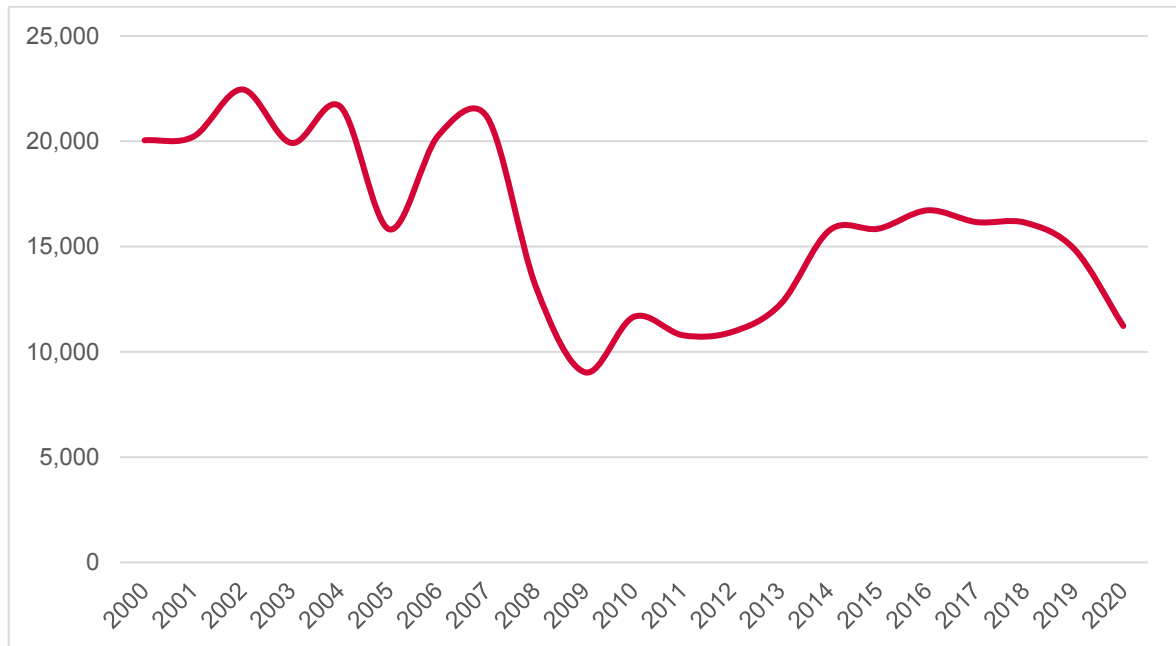
Table 4.3 Distribution of value of sales by local authority, 2020



4.11 The trend in market housing sales over time highlights the influence of macro-economic factors. A rise in interest rates saw a notable drop in sales in 2005; whilst the onset of the ‘credit crunch’ in 2007 saw a dramatic fall in the ability to access mortgage finance and combined with reduced market confidence and falling values saw a notable drop in sales volumes and market activities between 2007-9. A substantive recovery in market conditions was not seen before 2013, from which point the Bank of England’s Funding for Lending Scheme saw improved mortgage availability; which together with improved economic confidence and the Government’s Help-to-Buy Scheme supported a recovery in the market.

4.12 Sales volumes between 2014-2018 averaged 14,000 a year across Coventry & Warwickshire; which was 40% down on the pre-recession average (pre 2007). Indeed we have seen a decade of lower sales volumes. There are a complex set of factors which appear to have contributed to this, including: a low inflation environment such that inflation is not reducing the value of debt in real terms as it did in previous decades (pre-2000); longer mortgage terms; an ageing population who typically move infrequently; and a policy focus on caring for older persons in their home (resulting in fewer moves). Added to this have been increasing transactional costs of moving, particularly associated with rising values and the costs of Stamp Duty, which have affected both home owners and investors (with 3% additional Stamp Duty applicable to investment purchases from April 2016).

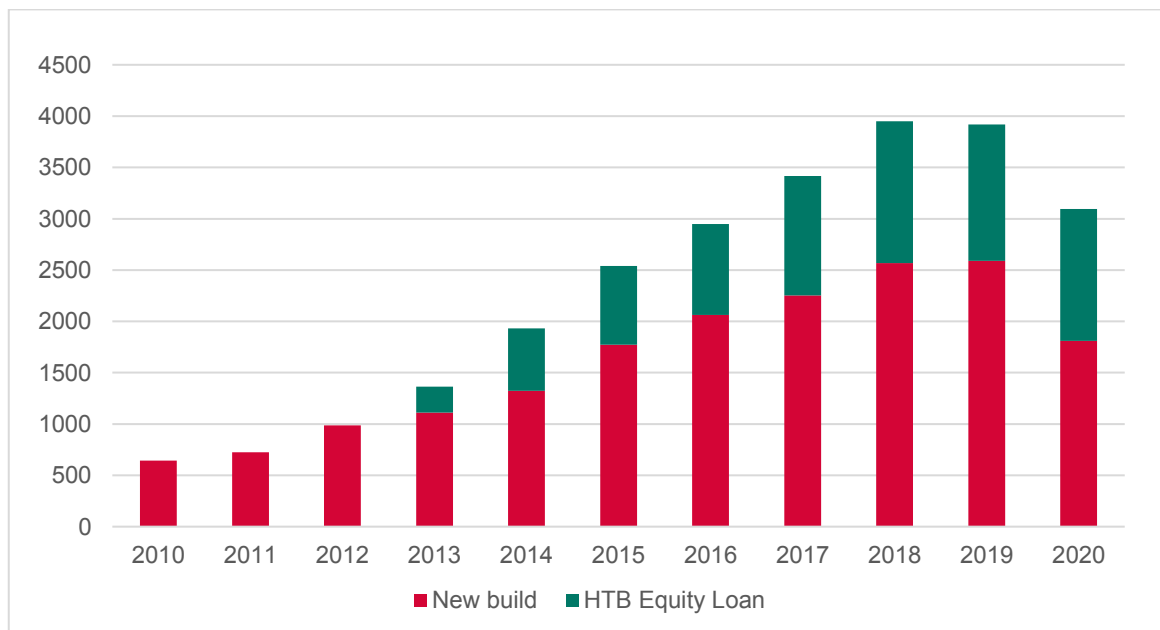
Figure 4.4: Sales Volumes – Coventry & Warwickshire HMA



Source: Derived from ONS Small Area House Price Statistics Dataset 6

- 4.13 The Government’s Help-to-Buy Equity Loan scheme has played an important role in supporting the housing market. Across the HMA it has supported 50% of new-build sales over the last 5 years (to Sept 2020). It will have particularly helped younger households (without existing equity) to buy a home.

Figure 4.5: New-Build Sales in HMA supported by Help-to-Buy Equity Loan Scheme



Source: Icen Analysis of ONS Small Area House Price Statistics Dataset 6 & MHCLG Help-to-Buy Equity Loan Scheme Statistics

- 4.14 This evidence for individual authorities shows some variance within the HMA, with the lowest proportion of new-build sales supported by Help-to-Buy in Warwick, and Stratford-on-Avon (45%) as less affordable markets for new entrants. North Warwickshire's (48%) supported sales were only a little stronger, while more than half of all new-build sales were supported by equity loans in Rugby (51%) and Coventry (54%). Nuneaton and Bedworth quite clearly outperformed all other local authorities (71%).

Table 4.4 Sales supported by Help-to-Buy Equity Loan in HMA – 5 Years to Sept 2020

5 years to Sept 2020	Overall New-Build Sales	HTB Equity Loan Sales	% Sales Supported
North Warwickshire	509	242	48%
Nuneaton and Bedworth	1,619	1,153	71%
Rugby	2,442	1,248	51%
Stratford-on-Avon	2,978	1,340	45%
Warwick	2,246	1,010	45%
Coventry	3,263	1,772	54%
C&W HMA	13,057	6,801	52%

Source: Icen Analysis of ONS Small Area House Price Statistics Dataset 6 & MHCLG Help-to-Buy Equity Loan Scheme Statistics

- 4.15 Icen's analysis indicates that 87% of those supported by the Help-to-Buy Scheme in the HMA have been First-time Buyers. This rises to 90% in Nuneaton and Bedworth, 95% in Rugby and 97% in North Warwickshire.

Table 4.5 First Time Buyers Supported by Help-to-Buy Equity Loan, to Sept 2020

	HTB Equity Loan Sales	Sales to First-time Buyers	% First-time Buyers
North Warwickshire	255	262	97%
Nuneaton and Bedworth	1,083	1,206	90%
Rugby	1,276	1,346	95%
Stratford-on-Avon	1,147	1,324	87%
Warwick	848	966	88%
Coventry	1,592	2,032	78%
C&W HMA	6,201	7,136	87%

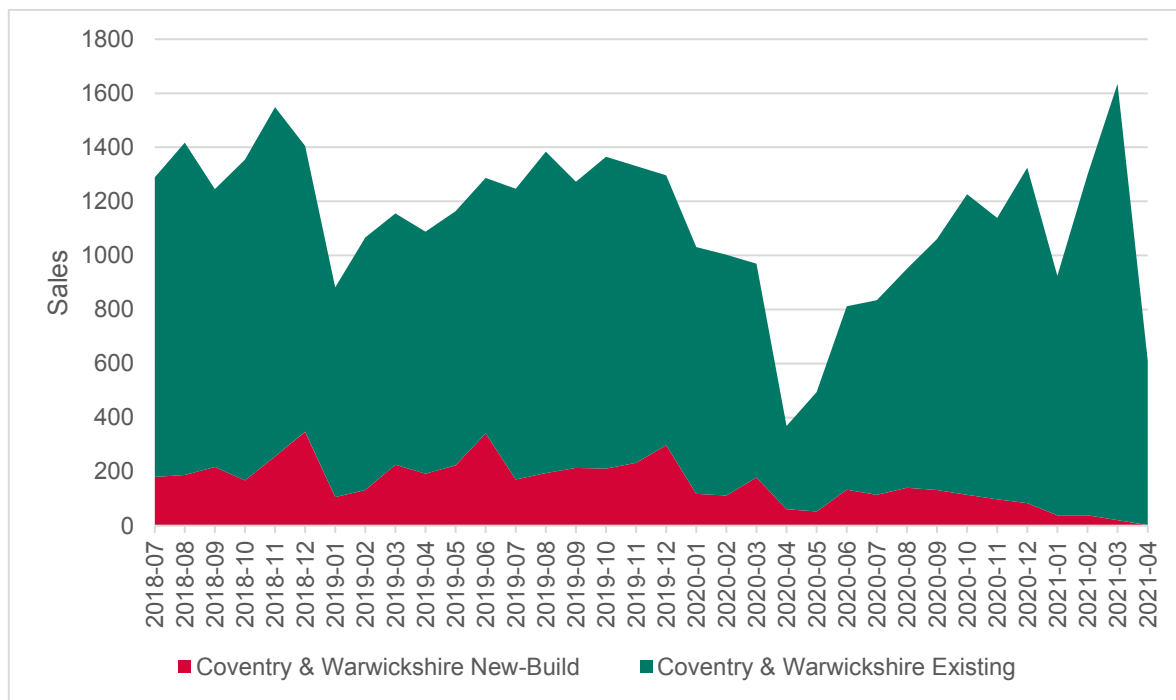
Source: MHCLG Help-to-Buy Equity Loan Scheme Statistics

- 4.16 It is very clear that the Help-to-Buy scheme has played a very important role in supporting First-time Buyers to purchase properties.
- 4.17 A more detailed recent picture of market activity can be gleaned by analysing HM Land Registry monthly data. This shows a particular dip in sales in April and May 2020 influenced by the first Covid-

19 lockdown. Sales volumes however grew through the second half of 2020 recovering to around 1,150+ sales per month; but this remains below longer-term trends and does not point to particular buoyancy within the local markets. As the figure below also shows, there has been a downward trend in new-build sales.

- 4.18 A combination of rising house prices and limited availability of mortgages with higher loan-to-value ratios has been restricting first-time buyer numbers; with first-time buyers also more likely to be younger and affected by the furlough scheme or rising unemployment. There are however signs of the availability of mortgages with a 5% or 10% deposit improving and the Government has provided support through the Mortgage Guarantee Scheme. The change to the Help-to-Buy Scheme may be having some impact.

Figure 4.6: Short-term Sales Volumes – Coventry & Warwickshire HMA



Source: Derived from HM Land Registry House Price Index

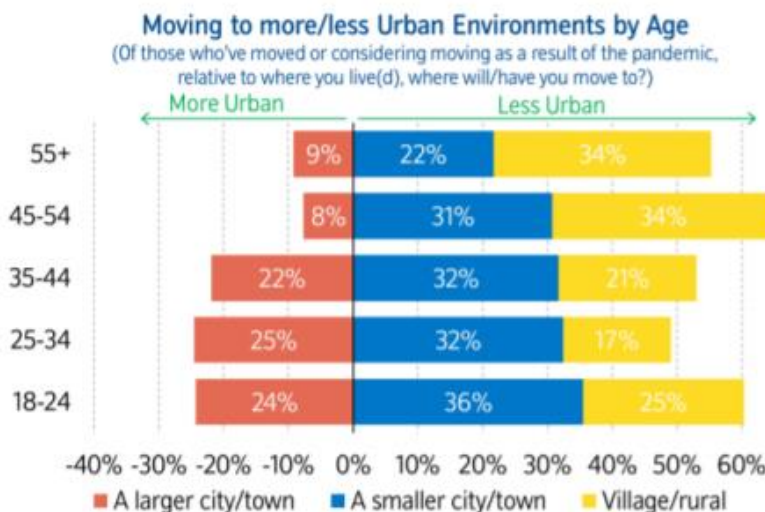
- 4.19 Monthly house price data from the HM Land Registry index shows a month-on-month growth in house prices over the last year, with a growth in average values of around £13,400 in Coventry and £22,500 in Warwickshire over the period from May 2020 (when the market reopened) to March 2021. Strong market conditions appear to have been influenced by a variety of factors including:

- Government support to the market through the Help-to-Buy scheme and the Stamp Duty Holiday, which was due to end in March 2021 but was subsequently extended to June 2021;

- The influence of the pandemic on people’s housing need and choices, from both a growth in home working which is reducing the requirement for being close to a workplace (with evidence that households are looking further from the workplace as a result) to changing space requirements including space to work and a requirement for outdoor space.

4.20 Nationwide reported in May 2021 house price growth of 10.9% over the last year nationally (which accords with our analysis), with values growing at the fastest rate since 2014. Whilst their research suggested that the Stamp Duty Holiday was a factor, three quarters of homeowners surveyed indicated that they would have been moving even if the Stamp Duty Holiday had not been extended. Of those moving or considering a move they found 33% were moving to a different area, whilst nearly 30% were doing so to access a garden or outdoor space more easily. The majority were looking to move to less urban areas, as the chart below shows.

Figure 4.7: Preferences of those looking to move, Spring 2021



Source: Nationwide House Price Index Press Release, May 2021

4.21 However over a third (36%) of those surveyed also indicated that they were more likely to consider enhancing their home as a result of Covid, with nearly half (46%) of these looking to add or maximise space; and 35% looking to improve energy efficiency or reduce their home’s carbon footprint.

Lettings Market

4.22 Across the Study Area, median rents are slightly higher than the regional average of £660 per calendar month at £725, with median rents in Nuneaton and Bedworth slightly lower than in other areas; and rents the highest in Stratford-On-Avon (£775) and Warwick (£800) per calendar month (higher than the national average).

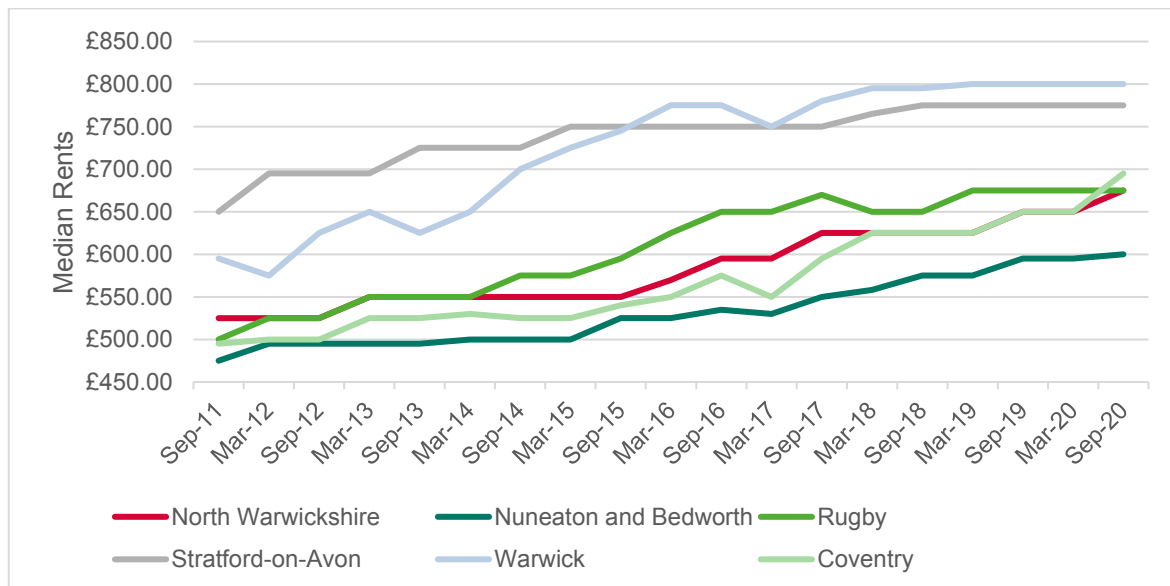
Figure 4.8: Median Rents, Year to March 2021



Source: ONS/VOA Private Rental Market Statistics

4.23 The chart below tracks changes in rental costs over time. Over the period since 2011 the medium-term trend has been of rental growth in line with the regional trend. It is notably however that Coventry has seen stronger relative growth in rents since 2017; albeit that over the period since 2018 rentals have been flat (and on average across the County have fallen slightly).

Figure 4.9: Median Rents, 2011-20



Source: ONS/VOA Private Rental Market Statistics

- 4.24 The table below considers growth in median and lower quartile (entry level) rents over the last 5 years. The strongest rental growth has been in Coventry, North Warwickshire and Nuneaton and Bedworth over the last 5 years (2014/15 – 2019/20), with notably weaker growth in median rents in Warwick. Lower quartile rents are highest in Stratford-on-Avon; but Coventry has seen the strongest rental growth over the last 5 years by some margin.

Table 4.6 Trends in Median and Lower Quartile Rents

	Median Rent	5 Year Growth		LQ Rent	5 Year Growth
North Warwickshire	£ 675	£ 125		£ 595	£ 100
Nuneaton and Bedworth	£ 600	£ 125		£ 540	£ 90
Rugby	£ 675	£ 80		£ 595	£ 70
Stratford-on-Avon	£ 775	£ 25		£ 700	£ 52
Warwick	£ 800	£ 55		£ 600	£ 50
Coventry	£ 695	£ 155		£ 600	£ 175
Warwickshire	£ 725	£ 75		£ 600	£ 75
West Midlands	£ 650	£ 100		£ 550	£ 100
England	£ 725	£ 100		£ 550	£ 56

Source: ONS/VOA Private Rental Market Statistics

Engagement with Estate and Lettings Agents – Authority Wide

- 4.25 IcenI has engaged with a number of estate and lettings agents to gather information and market insight around house prices, sales, rental values and overall buoyancy to supplement our data analysis from national sources. This engagement took place in early August 2021. The sub-sections below deal with each area of the market in turn.

Sales Market

- 4.26 This sub-section outlines the key findings of consultation with local housing agents in the district. The agents IcenI engaged with were located in the major towns that make up Warwickshire. These included Stratford-upon-Avon, Warwick, Royal Leamington Spa, Rugby and Nuneaton. Agents in Coventry were also contacted as well as a few agents in more rural settings of North and South Warwickshire to give a well rounded analysis of the housing market.
- 4.27 The general findings were that the Local Authority’s residential market is extremely buoyant with a wide mix of buyers and the market has seen an influx of interest after Covid-19 restrictions have been lifted. The Local Authority generally attracts buyers of all ages although there is typically more demand from first time buyers in the northern parts of Warwickshire compared to a demand for larger and more expensive family homes in the south of the Authority.
- 4.28 There is a trend for buyers in Warwickshire to be local. However, there is some demand from Londoners looking to relocate around the commuter towns of Rugby, Nuneaton and Stratford-upon-

Avon, as well as from other cities such as Birmingham and Leicester. The increase in purchasers from outside the Authority were buyers looking for more space and for a cheaper price now that commuter patterns have changed in light of Covid-19, according to the agents we spoke to.

- 4.29 The strongest relative demand at the time of the assessment was for 3-bedroom detached and semi-detached properties. Agents describe there is less demand for flats as people were demanding more space and would like to have gardens. There has been a distinct lack of supply for 3-bedroom homes and an increase in demand for the larger 4-bedroom family homes, certainly in the south of the Authority. Agents suggested buyers were taking advantage of the Stamp Duty Land Tax holiday and therefore seeking higher value properties, but the demand was high as those looking lower down the chain allowed the unlocking of properties further up, as families upsized.
- 4.30 The end of the Stamp Duty Land Tax has not stopped people looking to buy and sell in the market. Many agents noted that people would have moved regardless due to a need for more space, more available cash and flexibility in location with businesses not expecting employees to return to the office full-time.
- 4.31 Across the Authority agents highlighted an acute need for Bungalows, often for elderly people. These plots when they became available were usually sold immediately when they came to market.
- 4.32 There was a lack of investor interest in flats across the area, unless it was in or close to a commuter town centre. Some agents revealed that some flats had failed to sell for some time while on the market.
- 4.33 There were mixed reviews across the Authority in respect of new builds. In Warwick, one sales agent mentioned that there was a general move away from new builds with people preferring character housing. Conversely, in Rugby an agent referred to the 6,200 home new build development of Houlton where the demand is outstripping the supply.
- 4.34 Agents suggested overall demand is greatest for middle range value properties around the £250,000 to £350,000 as people often currently own lower value properties and are looking to move homes and increase the amount spent on a property. However, this varied greatly depending on the area, with North Warwickshire having an overall lower average house price, compared to South Warwickshire. The recent effect of Covid-19 and the subsequent Stamp Duty Land Tax holiday meant there are more buyers of all ages looking to buy in Warwickshire, hence the market is very buoyant. Despite the Stamp Duty Land Tax holiday coming to an end, the market continues to be busy.
- 4.35 All agents agree the residential sales market in the district performed well when Covid-19 restrictions were reduced in Summer/Autumn 2020. However, there has been a distinct lack of stock on the

market to supply this demand in most towns, as properties are being sold particularly quickly compared to the pre Covid-19 housing market with agents having to cap viewings on some properties and the asking price being regularly exceeded. House prices have continued to rise over the past year with many agents highlighting a 7-15% increase across all bands, with 3-bedroom houses showing the strongest growth. Demand has started to slow as the summer holidays begin, but many agents predict a more consistent and stable market to the end of 2021.

Rental Market

- 4.36 Icenl have undertaken market research speaking to local estate agents and letting agents in different parts of Warwickshire to understand local market dynamics in August 2021. This included a selection of agents across the Authority and Coventry including, Stratford-upon-Avon, Warwick, Nuneaton, Leamington Spa, Henley-in-Arden and Shipston-on-Stour. Agents indicated the rental market across the whole district is active and has remained consistently busy over the past year with an increase in demand once Covid-19 restrictions were lifted.
- 4.37 More generally the market is varied with people of all ages renting within the authority however there is a definite trend of younger single people, couples and young families looking to rent within the area. Most of those seeking rental properties in Warwickshire live locally or used to live locally and are looking to move back into the area, looking for a return to a more rural life. Some agents highlighted that family rental properties within school catchment areas were in particularly strong demand.
- 4.38 Agents referred to the lack of supply of housing on the sales market leading to families wanting to rent so they could wait until the right property came to market. Some agents referred to the trend of those living in towns near the trainlines that commute out to London and Birmingham for work, such as Nuneaton, Leamington Spa and Rugby. In the South of the authority a lower proportion of people commute outside of Warwickshire but the area still sees a number of people moving from London, preferring the areas closeness to the Cotswolds.
- 4.39 Coventry and Warwick are the only areas with student rental markets, but these have been less busy as many students have opted to stay at home. Many students prefer to rent in the area of Earlsdon for both the University of Warwick and Coventry University. Agents in Coventry highlighted that many Asian students continue to rent in the area while studying as well as strong demand from medical students.
- 4.40 Agents in the southern part of the authority covering Shipston-on-Stour, Henley-in-Arden, Warwick and Leamington Spa describe a popular rental market with greater relative demand from younger people often with families seeking 2 and 3 bed properties in particular. However, people of all ages

do rent within the area thus properties of all sizes are popular on the rental market with the exception of flats and properties with no garden.

- 4.41 Agents describe those who live in the towns with train stations such as Nuneaton, Leamington Spa and Rugby utilise the train stations with a percentage commuting out of Warwickshire to go to work. Rural dwellers are more likely to work more locally or from home. Agents across the authority describe a very strong rental pre Covid-19, but the demand has increased since Covid-19 leading to a current undersupply of properties on the rental market. Many agents highlighted a desperate need for all kinds of properties and that viewings would have to be capped to prevent an unmanageable amount of applications. The market has remained consistently busy for a number of years and agents expect it to remain so.
- 4.42 Rental values have increased modestly in the previous few years but Covid-19 has quite notably impacted the rental prices as demand outstrips the supply of available properties, especially in the south of the authority. The average prices for a 2-bed property in the south of the authority is £750-£950 per calendar month. Agents mentioned that the asking price would often be surpassed, particularly for 2-3 bedroom homes.
- 4.43 Similarly, in the northern part of the authority covering Coventry, Rugby and Nuneaton agents describe the rental market varied with different ages but there is a focus on students, couples and small families seeking 2 or 3-bed properties; the key driver behind this focus in the market is price orientated, many smaller and therefore cheaper properties are on the rental market, hence couples and young families rent these properties.
- 4.44 Rental values are less than in the south of the district with a 2- bed property average rental price of £650-£750 per calendar month. It was suggested there has been an increase in the number of renters due to potential buyers of properties (particularly first-time buyers) being priced out of the sales market by investors and particularly those moving on from their first property, but eager to move out of their family homes. Again, in the northern part of the authority the rental market is very active often with a greater demand than supply of rental properties.
- 4.45 All agents which we spoke to suggest a strong rental market at the current time across Coventry and Warwickshire often there is insufficient number of rental properties on the market relative to demand, this demand has increased since Covid-19. One agent suggested that tax changes and a surge in the price of houses prompted landlords to sell. This has left to a further deficit in the number of rental properties.

Engagement with Estate and Lettings Agents- Sub-Areas

4.46 Below is a more detailed account from agents on the sales and lettings market in specific sub-areas of Warwickshire.

Coventry

4.47 The city is currently active with great demand up to the end of the Stamp Duty Tax relief but has since calmed down. First-time buyers, young families and investors seem to be the most active profile of buyers. The supply could not keep up with demand for the first six months of 2021 and anything below £200,000 was sold immediately.

4.48 Families look to buy and rent 2- and 3-bedroom semi-detached and detached properties within the catchment areas of good schools. There is a good mix of all types of buyers in the area. Students tend to gravitate towards the area of Earlsdon in the South of the City for access to both Warwick and Coventry University. One agent believes the market could get quieter over the next six months.

Stratford-upon-Avon

4.49 Stratford-upon-Avon has an incredibly busy market and has remained so during the pandemic due to its high-end housing market which remains relatively undisrupted. There has been constant demand for 3 to 5-bed properties with families and couples looking to move locally and from London. The number and variety of good public, grammar and comprehensive schools attracts young families as well as access to the outdoors; the Cotswolds being only a short distance away. Access to the A46 and M40 also makes accessing different points of England easy.

4.50 Properties are going for more than asking price and the agents we spoke to have said they have been busier than ever. They mention that any character property up to £800,000 is likely to go quite quickly. This area is particularly hard for first-time buyers due to the high cost of housing in the area and being outbid by cash buyers. Flats and apartments have a harder time of selling. They expect Londoners and city-dwellers to continue to flock to the area in search of more space and prices to continue rising.

Leamington Spa

4.51 Agents have noticed less properties coming to market recently, but demand has been consistently strong in Leamington Spa. There have been a number of first-time buyers and young relocators moving to the area, generally from bigger cities and two agents mention an influx of renters coming from Hong Kong.

4.52 3-bed detached and semi-detached homes are in the most demand with an average property selling for between £350,000-£400,000, a price that has increased by around 10% over the last year. One

agent commented that not many people are bothered about town centre living, preferring space with a garden, although the Victorian terraces and character homes have always sold quickly. Connections by rail into London Marylebone and short distance to the M40 and A46 make Leamington Spa very well connected, and access to good schools and industry make it very attractive.

Warwick

- 4.53 Warwick is no different to the other areas in Warwickshire with an incredibly buoyant market with one agent describing it as a record-breaking year, although things have slowed down over July and August 2021 (agents suggesting this is normal with school holidays). There has been a real mix of buyers from investors to first-time buyers, young professionals and families. A majority are local but perhaps 30 per cent are people from London buying a second home. Apartments are the only type of property that agents are struggling to sell.
- 4.54 The £220,000-£300,000 band is the most active but there has been high demand and a lack of supply for 5-bedroom properties. One agent described there being strong interest in town centre living with access to amenities. A theme across all towns in Warwickshire was the lack of bungalows that came to market and were in very high demand for older people. This was distinctly so in Warwick.

Rugby

- 4.55 Again agents have described an extremely busy period for the market where people are going above the asking prices. There seems to have been a higher demand from first-time buyers in Rugby and investors and a split of 80% are moving locally compared to the other 20% coming from London. Across the board there is demand for all kinds of houses, but perhaps more so for 2 to 3-bed properties.
- 4.56 One agent described how they believed a flood of people looking and selling at the bottom of the market has unlocked the market above them, allowing price bands of £400,000-£500,000 to sell quickly, which have struggled to move in the past. Even flats are selling and prices are very inflated due to the demand. One agent described one property having around 50 viewings when it came to market which is unprecedented. The demand is down to a mix of Stamp Duty Tax relief and a need for movers to find more space and relocate for work.
- 4.57 A new development in Houlton containing 6,200 homes has sold extremely well according to one agent and they can not build them fast enough. This goes against the trend in other areas where agents described a lack of interest in new builds.

Nuneaton

- 4.58 Nuneaton has remained busy with some slight tail off in the July and August period, but the market has always been consistently busy. There has been a mix profile of buyers but as many as 70% of are first-time buyers. Young professionals are looking as well as a handful of investors. The bottom of the market seems to be doing better than the higher end, with properties up to £250,000 going very quickly and for over asking price, although one agent said prices have and will remain static. A majority of movers have come from Warwickshire, but also from Milton Keynes, Luton and London.
- 4.59 Agents in Nuneaton expect the market to continue to be strong. Demand from Londoners and city-dwellers is expected to continue as Nuneaton has fantastic transport links, good schools and a great community.

Shipston-on-Stour

- 4.60 Agents in Shipston-on-Stour state that the market has been and is very busy but supply has been short in comparison to the strong demand. A lot of first-time buyers have been coming forward as well as agents dealing with those downsizing due to divorces, kids moving out etc. The lower end of the market, however, seems to be weakest with the higher end stuff, which wouldn't sell a year ago, receiving plenty of viewings. The £300,000 to £500,000 is the strongest price band, although there is nothing in the £500,000 to £700,000 range that is coming to market and would be quickly purchased.
- 4.61 The area is particularly attractive for its proximity to the Cotswolds and Oxford and recent investment in the town has led to new restaurants and boutique stores opening. Around 50% of people looking in the area are local while the other 50% are coming from London and either purchasing or buying a second home. New developments in the area do not sell and people are only interested in character properties. An agents suggested the extension on the time it has taken to build these new properties may be a factor.

Henley-in-Arden

- 4.62 Another buoyant market according to agents in Henley-in-Arden with all properties selling well with the exception of flats. There is a gap in the market at the higher end of properties where demand is out stripping supply. The buyers have now moved from cash back to the more traditional chain and seem to be moving in from Birmingham or staying local, attracted by the idea of more space and less crime.
- 4.63 Families are the predominant buyers looking for 3 to 4-bed semi-detached and detached housing. Agents expect the market to remain the same until the end of the year. Bungalows have always been in demand by older residents.

PART B: CONSIDERING OVERALL DEVELOPMENT NEEDS

5. DEMOGRAPHIC DYNAMICS AND OVERALL HOUSING NEED

5.1 This section of the report considers overall housing need set against the framework of Planning Practice Guidance (PPG) – specifically the Standard Method for assessing housing need. The section also considers demographic trends; with publication of new 2021 Census data in 2022 it is possible to reset some of the previous population estimates from ONS. The Census is particularly important as ONS had faced some criticism for significantly over-estimating population growth in Coventry and this seems to be confirmed through Census data.

5.2 The Census data has been used, alongside other data, to develop a new trend-based projection for all authorities in the area, which can again be considered within the framework of the Standard Method. Where projections are discussed in this report, the analysis mainly looks at the 2022-32 period (as this fits with the Standard Method) with data generally being shown on an annual basis that can be rolled forward for plan periods post 2032.

Standard Method

5.3 The analysis below considers the level of local housing need for Coventry & Warwickshire having due regard to the Standard Method. The methodology for calculating housing need is clearly set out by Government in Planning Practice Guidance and follows a four-step process worked through in the following sub-sections. We consider first the implications of use of the 2014-based Household Projections, the use of which is mandated by in the Planning Practice Guidance.

Step One: Setting the Baseline

5.4 The first step in considering housing need against the Standard Method is to establish a demographic baseline of household growth. This baseline is drawn from the 2014-based Household Projections and should be the annual average household growth over a ten-year period, with the current year being the first year i.e. 2022 to 2032. This results in household growth of 38,935 households (3,894 per annum) over the ten-year period for the whole of the study area.

5.5 Although this figure is calculated over a ten-year period from 2022 to 2032, Paragraph 12 of the PPG states that this average household growth and the local housing need arising from it can then “be applied to the whole plan period” in calculating housing need.

Step Two: Affordability Adjustment

5.6 The second step of the standard method is to consider the application of an uplift on the demographic baseline, to take account of market signals (i.e. relative affordability of housing). The adjustment increases the housing need where house prices are high relative to workplace incomes. It uses the

published median affordability ratios from ONS based on workplace-based median house price to median earnings ratio for the most recent year for which data is available.

- 5.7 The latest (workplace-based) affordability data is for 2020-based and was published by ONS in March 2021. The Government's Guidance states that for each 1% increase in the ratio of house prices to earnings, above 4, the average household growth should be increased by 6.25%, with the calculation being as follows:

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

- 5.8 The ratio varies from 5.96 in Coventry, up to 10.93 in Warwick, giving a range of uplifts from 12%-42%. The specific calculations are set out in Table 5.1.

Step 3: The Cap

- 5.9 The third step of the standard method is to consider the application of a cap on any increase and ensure that the figure which arises through the first two steps does not exceed a level which can be delivered. There are two situations where a cap is applied:

- The first is where an authority has reviewed their plan (including developing an assessment of housing need) or adopted a plan within the last five years. In this instance the need may be capped at 40% above the requirement figure set out in the plan.
- The second situation is where plans and evidence are more than five years old. In such circumstances a cap may be applied at 40% of the higher of the projected household growth (step 1) or the housing requirement in the most recent plan, where this exists.

- 5.10 Only Stratford-on-Avon and Warwick have an affordability ratios above 40%, however in both areas the adopted plans are for higher housing numbers than the Standard Method (730 dwellings per annum in Stratford-on-Avon and 932 in Warwick) – therefore no cap is applied.

Step Four: Urban Uplift

- 5.11 The fourth and final step in the calculation means that the 20 largest urban areas in England are subject to a further 35% uplift. This uplift ensures that the Governments stated target of 300,000 dwellings per annum is met and that “homes are built in the right places, to make the most of existing infrastructure, and to allow people to live nearby the service they rely on, making travel patterns more sustainable.” (Paragraph: 035 Reference ID: 2a-035-20201216).

- 5.12 Coventry City is listed within the top 20 urban areas in the country it is therefore subject to this additional uplift.

Standard Method Calculation using 2014-based Household Projections

- 5.13 The table below works through the Standard Method calculations and for the whole of the study area shows a need for 4,727 dwellings per annum before the urban uplift; this increases to 5,554 with the inclusion of this uplift, a further 826 dwellings pa in Coventry.

Table 5.1 Standard Method Housing Need Calculations using 2014-based Household Projections

	Coventry	North Warwks	Nuneaton & Bedworth	Rugby	Straford-on-Avon	Warwick	C & W
Households 2022	154,763	27,351	56,500	46,728	56,445	63,486	405,273
Households 2032	175,801	28,742	60,025	50,968	60,435	68,237	444,208
Change in households	21,038	1,391	3,525	4,240	3,990	4,751	38,935
Per annum change	2,104	139.1	352.5	424	399	475.1	3,894
Affordability ratio (2021)	5.96	8.23	7.73	7.47	10.62	10.73	-
Uplift to household growth	12%	26%	23%	22%	41%	42%	-
Initial need (per annum)	2,362	176	435	516	564	675	4,727
Capped	NA	NA	NA	NA	NA	NA	-
Urban uplift	35%	0%	0%	0%	0%	0%	-
Total need (per annum)	3,188	176	435	516	564	675	5,554

Source: Derived from a range of ONS and MHCLG sources

- 5.14 This is above previous assessments of need. The 2015 SHMA Update identified a need for 4,272 dpa, albeit that this was based on a different methodology as derived from the 2012 NPPF/ 2013 Planning Practice Guidance.

Divergence from the Standard Method (Exceptional Circumstances)

- 5.15 The table above sets out housing need using the Standard Method and whilst this is a relevant consideration Planning Practice Guidance does allow for divergence from these figures (in both an upward and downward direction) where exceptional circumstances can be demonstrated. An important start point is to understand Government Guidance on this topic. This can be found in Planning Practice Guidance 2a and below are some key quotes for the purposes of this document.

“Is the use of the standard method for strategic policy making purposes mandatory?”

No, if it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances.” - Paragraph: 003 Reference ID: 2a-003-20190220

"If authorities use a different method how will this be tested at examination?"

Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination. Any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method." - Paragraph: 015 Reference ID: 2a-015-20190220 (whole paragraph not replicated)

5.16 The guidance is therefore quite clear: there is an expectation that the 2014-based sub-national household projections (SNHP) should be used but that an alternative approach can be applied where relevant. When using an alternative approach, it is necessary to take account of demographic growth and market signals, but this cannot include using more recent versions of published SNHP. The PPG does not specifically set out examples of exceptional circumstances but it is considered that there are likely to be two main considerations:

- 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.

5.17 In summary, this report concludes that both of these factors are relevant. In particular, population growth for Coventry appears to be systematically over-estimated, which leads to trend-based projections that are demonstrably too high. Additionally, there is evidence that more recent trends in population growth (confirmed by Census data) in many parts of Warwickshire have been stronger than in the period to 2014 – mainly due to changes in migration levels – and so the 2014-based figures can be thought of as unreliable. It is also the case that other key aspects of population projections (fertility and mortality rates) have diverged significantly from those projected in the 2014-based projections.

5.18 The analysis below therefore looks at some of the issues around population growth and projections in Coventry and Warwickshire before moving on to look at what might be seen as a reasonable trend-based projection using available information. The focus is particularly on population projections and the report does not seek to challenge the market signals element of the Standard Method with the latest figures published affordable by ONS being used to generate estimates of need.

Reviewing Population Trends

5.19 As noted previously, 2021 Census data was published in 2022 which allows a view of the current population size and age structure in different areas. It is however the case that ONS when developing

population projections tends to draw on its mid-year population estimates (MYE) the latest running to 2020.

- 5.20 The analysis below looks at key data about demographic trends in Coventry & Warwickshire, particularly focussing on past population growth and the components of population change. This allows consideration of whether there are exceptional circumstances and if there is a case for alternative projections to be developed to estimate housing need.

Population

- 5.21 The table below shows ONS estimates for the population by authority in 2020. The population of Coventry & Warwickshire was estimated to be around 963,200 with around two-fifths of people living in Coventry (379,400 persons). Warwick District is the next most populous area.

Table 5.2 Estimated Population by Local Authority (2020) – Coventry & Warwickshire

	Estimated population	% of population
Coventry	379,387	39.4%
North Warwickshire	65,452	6.8%
Nuneaton and Bedworth	130,373	13.5%
Rugby	110,650	11.5%
Stratford-on-Avon	132,402	13.7%
Warwick	144,909	15.0%
Coventry & Warwickshire	963,173	100.0%

Source: ONS MYE

- 5.22 The data above can be contrast with more recent information from the 2021 Census (albeit this is for one year later than the MYE). This shows a much lower population in the HMA than previously estimated with the biggest difference being in Coventry.

Table 5.3 Estimated Population by Local Authority (2021) – Coventry & Warwickshire

	Estimated population	% of population
Coventry	345,300	36.7%
North Warwickshire	65,000	6.9%
Nuneaton and Bedworth	134,200	14.2%
Rugby	114,400	12.1%
Stratford-on-Avon	134,700	14.3%
Warwick	148,500	15.8%
Coventry & Warwickshire	942,100	100.0%

Source: 2021 Census

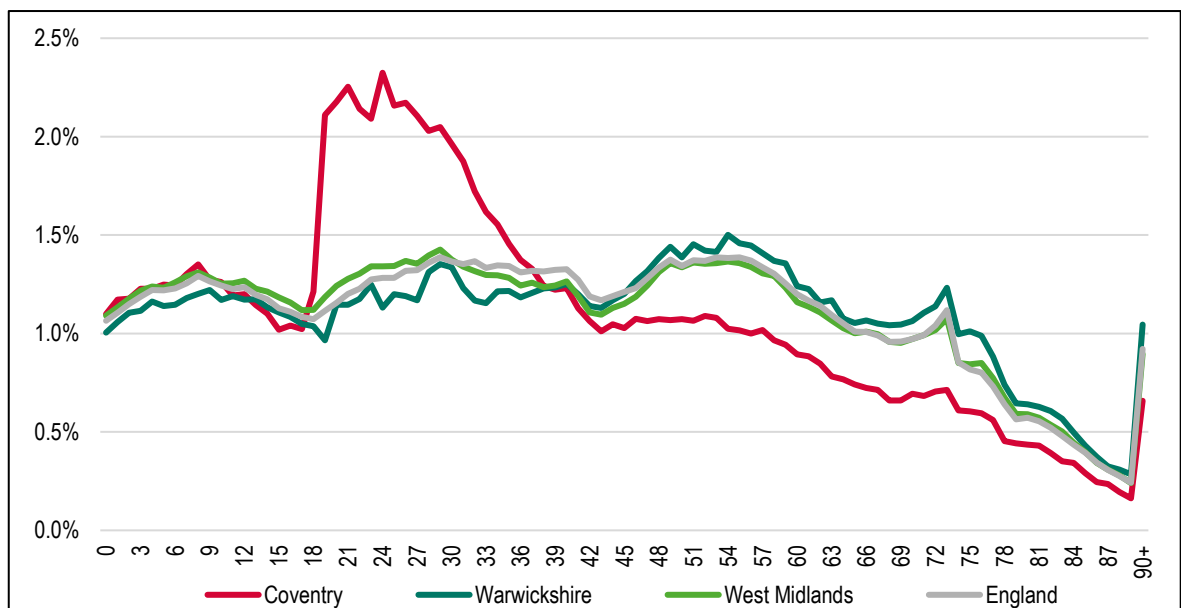
5.23 The analysis below was undertaken prior to publication of 2021 Census data and looked at a range of sources to estimate what the population and age structure of each area in the HMA might be given the likelihood (subsequently confirmed by Census data) that ONS population monitoring through the MYE is substantially wrong. Whilst the analysis below is quite lengthy, it is considered useful to include as it does clearly identify an exceptional circumstance regarding demographic data in the HMA.

5.24 The analysis below finishes by estimating population in 2020, which has then been rolled forward a further year to 2021 to allow for a comparison with the 2021 Census. Census data is then used (along with other demographic data (e.g. about birth and death rates) to construct a trend-based projection, which can then be used within the framework of the Standard Method to estimate housing need across the HMA.

Age Structure

5.25 The figure below shows the population age profile of Coventry & Warwickshire compared with a range of other areas based on the ONS Mid-Year Estimates. For Coventry, the data shows a relatively young age structure in comparison with the regional and national position with Warwickshire having a profile more in line with that seen across other areas. Notably, the proportion of the population in Coventry is lower than seen regionally or nationally for all age groups from about 40 onwards. The City also sees a particular spike of people in their late teens and early twenties which will be related to the student population. It also has a relatively high number of people in their late 20s and 30s.

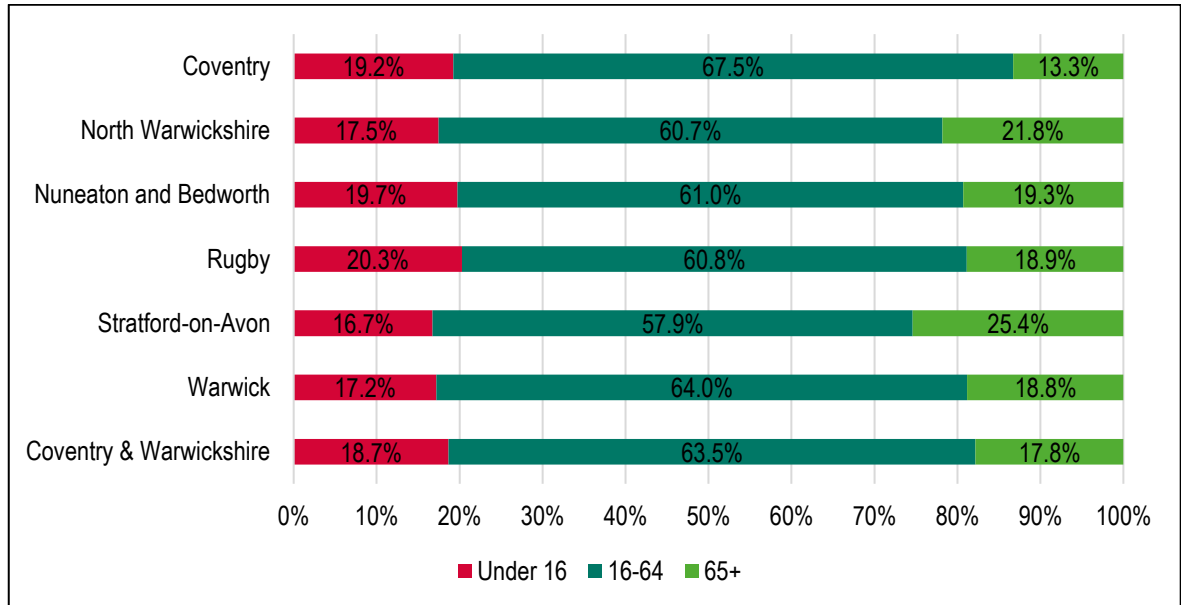
Figure 5.1: Population Profile (2020)



Source: ONS Mid-Year Population Estimates

5.26 The figure below considers the broad age profile by local authority based on the ONS Mid-Year Estimates (MYEs). The analysis shows slightly different are profiles in local authorities in the County, with Stratford-on-Avon having the highest proportion of people aged 65 and over and Warwick seeing the highest proportion aged 16-64 (outside of Coventry), linked to its student population.

Figure 5.2: Population Profile by Local Authority (2019) – Coventry & Warwickshire

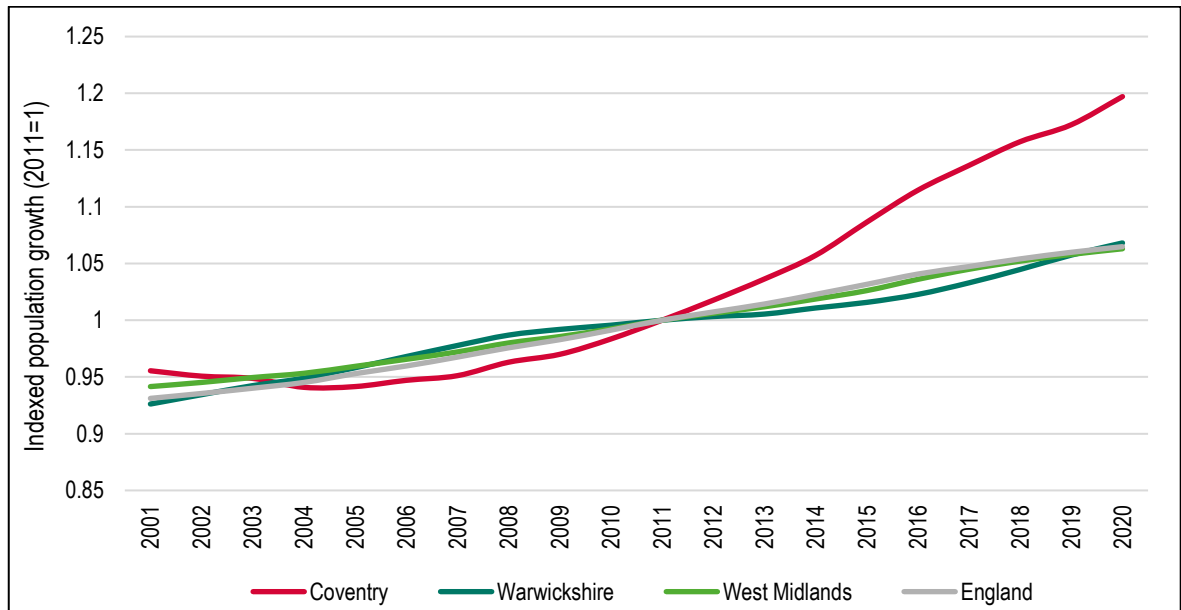


Source: ONS Mid-Year Population Estimates

Past Population Change

5.27 The figure below considers population growth in the period from 2001 to 2020 (indexed to 2011) shown in the ONS MYEs. Over this period that the population of both Coventry and Warwickshire has increased, with the ONS estimates suggesting particularly strong growth in Coventry. In 2020, it is estimated that the population of Coventry had risen by 25% from 2001 levels, with a 15% increase seen in Warwickshire. These figures are in contrast with a 13% rise across the region and 14% nationally. The ONS estimates suggest the population of Coventry has risen by 20% in just the last 9-years.

Figure 5.3: Indexed Population Growth (2001-2020)



Source: ONS Mid-Year Population Estimates

5.28 The table below considers population change over the 9-year period to 2020 (a 9-year period being chosen as the starting point of 2011 has data is likely to be fairly accurate as it draws on information in the Census). The analysis shows over the period that the population of Coventry increased by 19.7% with a 6.8% increase for Warwickshire. For Coventry, this is a high level of population change and compares with increases of 6.3% in the West Midlands and 6.5% across England.

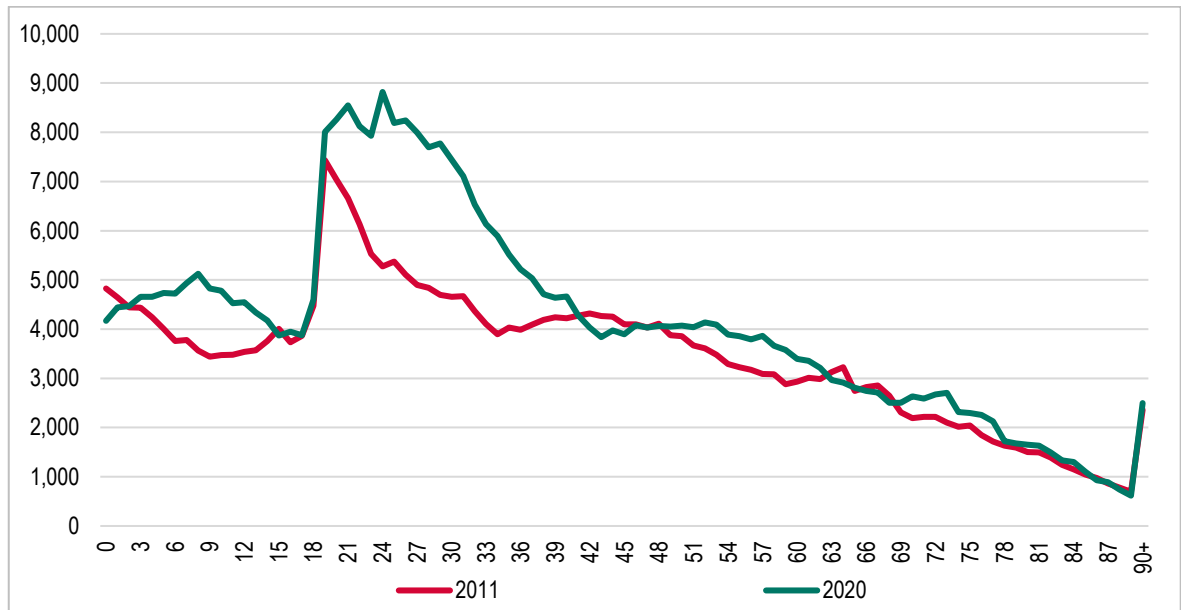
Table 5.4 Population Change (2011-20)

	Population (2011)	Population (2020)	Change	% change
Coventry	316,915	379,387	62,472	19.7%
Warwickshire	546,554	583,786	37,232	6.8%
West Midlands	5,608,667	5,961,929	353,262	6.3%
England	53,107,169	56,550,138	3,442,969	6.5%

Source: ONS Mid-Year Population Estimates

5.29 The figures below show population change by age (again for the 2011-20 period). In Coventry, the analysis suggests there has been a notable change to the age structure with the proportion of people aged in their 20s and early 30s increasing significantly – there has been relatively little change in the number of people in age groups from about 40 onwards. The analysis shows that all of the three broad age bands have seen an increase in population but the 16-64 age band has seen the highest proportionate increase in population, and also the highest increase accounting for 78% of all population increase.

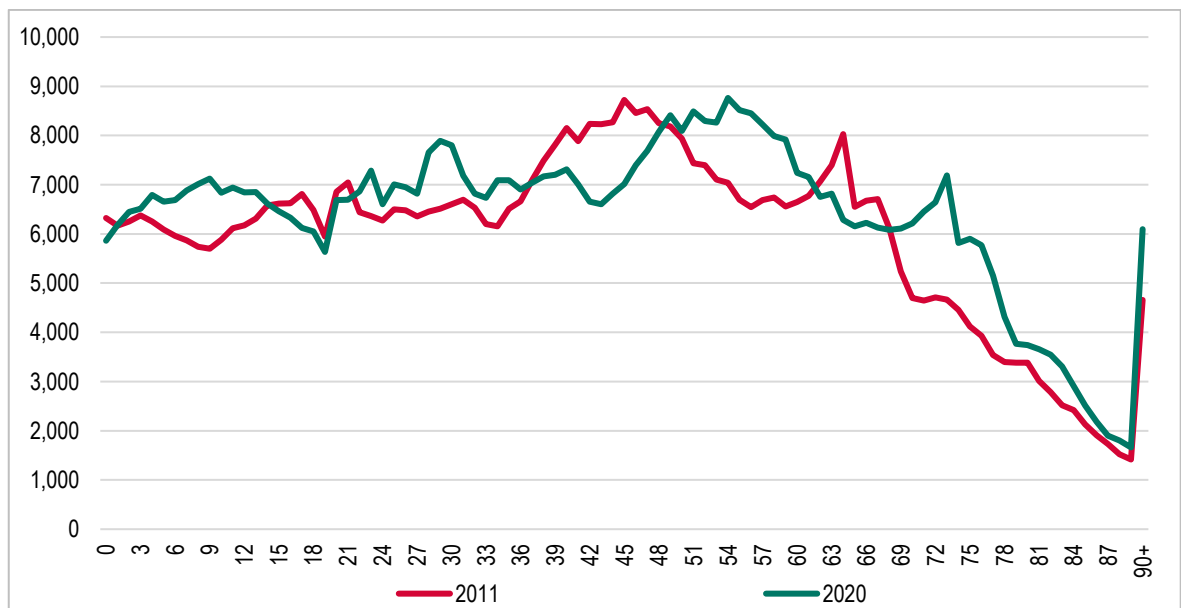
Figure 5.4: Population Age Structure in 2011 and 2020 – Coventry



Source: ONS Mid-Year Population Estimates

5.30 In Warwickshire, there are differences between 2011 and 2020 across many age groups although when looking at the single year of age data it is clear that some of this will be due to cohort effects (such as the high population aged 64 in 2011 developing into a high population aged 73 nine years later). When looking at broad age bands, it can again be observed that all age groups have seen an increase in population. An ageing of the population is notable; the population aged 65 and over increased by 21% over the 9-year period and accounted for over half of all population growth.

Figure 5.5: Population Age Structure in 2011 and 2020 – Warwickshire



Source: ONS Mid-Year Population Estimates

- 5.31 Additional analysis is provided below for individual local authorities. The data shows for the 2011-20 period that all the Warwickshire authorities have seen an increase in population; the highest increase being in Coventry (20%) followed by Rugby (10%). At the other end of the scale, Nuneaton & Bedworth (4%) has seen more modest changes to population.

Table 5.5 Change in Population by Local Authority (2011-20)

	2011	2020	Change	% Change
Coventry	316,915	379,387	62,472	19.7%
North Warwickshire	62,089	65,452	3,363	5.4%
Nuneaton and Bedworth	125,409	130,373	4,964	4.0%
Rugby	100,496	110,650	10,154	10.1%
Stratford-on-Avon	120,824	132,402	11,578	9.6%
Warwick	137,736	144,909	7,173	5.2%
Coventry & Warwickshire	863,469	963,173	99,704	11.5%

Source: ONS

Components of Population Change

- 5.32 The tables and figures below consider the drivers of population change 2001 to 2020. The main components of change are natural change (births minus deaths), net migration (internal/domestic and international) and other changes. There is also an Unattributable Population Change (UPC) which is a correction made by ONS upon publication of Census data if population has been under- or over-estimated. UPC relates to the 2001-11 period.
- 5.33 For Coventry, the data shows a high positive level of natural change throughout the period (i.e. more births than deaths). Internal migration has been quite variable – negative in all years with the data for 2018/19 showing a particularly high number of people (net) moving from the City to other locations. The last five years for which data is available shows an average of about 2,200 people (net) moving from the area to other parts of the United Kingdom. International migration is also variable, although the data does suggest a positive net level for each year back to 2001/2. Over the past five years international migration has averaged about 7,800 people per annum (net).
- 5.34 For Warwickshire, the data also shows a positive level of natural change throughout the period (apart from 2019/20), but at a lower level than seen in the City. Internal migration has been positive in all years (all years apart from 2011/12 and 2012/13) and generally has been on an upward trend over the past decade or so. The last five years for which data is available shows an average of about 4,200 people (net) moving to the area from other parts of the United Kingdom. International migration has also been positive throughout the period studied. Over the past five years international migration has averaged about 1,200 people per annum (net).

5.35 The data also shows a negative level of UPC in Coventry, suggesting that between 2001 and 2011, ONS may have initially *overestimated* population growth within population estimates (and this was corrected once Census data had been published). For Warwickshire, there is a modest positive UPC, suggesting a potential *under-estimate* of population growth in the 2001-11 period.

5.36 The UPC is particularly high in Coventry, where in total over the 10-years to 2011, it appears as if ONS mid-year estimates were a total of 14,900 people different from the actual count in the 2011 Census. For Warwickshire, the discrepancy is 1,700 people in total (in the opposite direction). The findings about UPC are important in the context of the analysis in this section and subsequent Census data as it seems clear that UPC has continued post 2011 and in the case of Coventry actually increased significantly.

Table 5.6 Components of Population Change, mid-2001 to mid-2020 – Coventry

	Natural change	Net internal migration	Net international migration	Other changes	Other (unattributable)	Total change
2001/2	707	-2,566	1,887	-23	-1,514	-1,509
2002/3	672	-1,899	2,109	-14	-1,498	-630
2003/4	847	-2,861	1,005	28	-1,510	-2,491
2004/5	910	-2,280	3,093	-13	-1,498	212
2005/6	1,153	-1,732	3,825	-19	-1,484	1,743
2006/7	1,388	-2,775	4,206	-25	-1,494	1,300
2007/8	1,735	-1,487	4,994	-4	-1,481	3,757
2008/9	1,691	-1,355	3,376	-16	-1,489	2,207
2009/10	2,079	-946	4,668	-33	-1,487	4,281
2010/11	2,252	-774	5,206	48	-1,491	5,241
2011/12	2,078	-992	4,474	29	0	5,589
2012/13	1,872	-596	4,593	50	0	5,919
2013/14	1,929	-264	4,938	-8	0	6,595
2014/15	1,737	-379	7,912	0	0	9,270
2015/16	1,800	-501	7,652	-24	0	8,927
2016/17	1,667	-1,014	6,306	-25	0	6,934
2017/18	1,470	-2,273	7,630	-191	0	6,636
2018/19	1,451	-4,241	7,577	-51	0	4,736
2019/20	1,013	-3,036	9,780	109	0	7,866

Source: ONS

Table 5.7 Components of Population Change, mid-2001 to mid-2020 – Warwickshire

	Natural change	Net internal migration	Net international migration	Other changes	Other (unattributable)	Total change
2001/2	107	3,634	554	-1	204	4,498
2002/3	124	3,425	647	-24	193	4,365
2003/4	361	2,854	121	55	190	3,581
2004/5	508	3,025	1,337	-23	169	5,016
2005/6	496	2,206	2,558	-11	157	5,406
2006/7	1,085	2,592	1,428	-2	219	5,322
2007/8	1,179	1,341	2,345	-6	144	5,003
2008/9	1,168	701	704	5	169	2,747
2009/10	1,294	476	161	-46	150	2,035
2010/11	1,348	690	182	54	114	2,388
2011/12	1,513	-6	268	-9	0	1,766
2012/13	1,090	-488	502	93	0	1,197
2013/14	1,123	433	1,236	141	0	2,933
2014/15	427	966	1,246	65	0	2,704
2015/16	661	1,338	1,768	70	0	3,837
2016/17	502	3,561	1,510	-2	0	5,571
2017/18	208	5,040	963	237	0	6,448
2018/19	504	5,768	617	34	0	6,923
2019/20	-543	5,329	1,027	40	0	5,853

Source: ONS

Accuracy of Population Estimates

- 5.37 It can be seen from the analysis above that the population of Coventry is estimated to have increased at a substantially faster rate than seen across Warwickshire, or indeed for any of the local authorities in the County. The estimates of the population of Coventry have been criticised - most notably by CPRE (Warwickshire) - as being too high and therefore having an impact on future projections (which in turn lead to estimates of housing need).
- 5.38 The analysis below therefore focusses on population growth in Coventry. This has been driven by public discussion of this matter over the past few years, which has included ONS being asked to consider the methods by which they prepare their mid-year population estimates (MYE). Below is a brief overview of some of the context to recent discussions on population estimates. Whilst the focus is on Coventry, it is important for this study to also consider similar issues across the wider Housing Market Area given the migration and housing market interactions between authorities.

CPRE Criticisms of ONS

- 5.39 On the 13th November 2020, Sir Andrew Watson (Chair of CPRE Warwickshire) and others wrote to Ed Humpherson (Director General for Regulation at the Office for Statistics Regulation (OSR)) and Sir David Norgrove on the topic of '*population projections and mid-year population estimates for Coventry*'. In the correspondence it was requested that the United Kingdom Statistics Authority (UKSA) conduct a review of population estimates and projections for Coventry as it was believed that figures had been greatly inflated for Coventry with impacts on planning policy development and decisions being made on the back of bad data.
- 5.40 In particular, and relevant to the HEDNA, it was stated by CPRE that "*projections and associated household projections are used as the basis for forward planning by all local planning authorities, the very high figures for Coventry have led that authority and neighbouring Warwickshire authorities to over-allocate land for housing in their local plans.*"
- 5.41 The correspondence suggests when "*a very wide range of administrative data for Coventry is examined, it fails to show any sign of exceptional growth in the City. All the vital signs of the town – births, deaths, voters, cars registered, pensioners, school admissions, houses built, benefits claimed, A&E attendances, gas and electricity used, and domestic waste produced are completely average for the region*". A copy of correspondence setting out some of the CPRE analysis can be found in a letter dated 13th November 2020.¹⁴
- 5.42 Mr Humpherson first replied to Mr Watson in December 2020¹⁵, noting "*in light of the matters raised within your letter we have decided to undertake a review of the population projections and population estimates produced by the Office for National Statistics (ONS) and how they are used*". This was followed up with the publication of a document "*Review of population estimates and projections produced by the Office for National Statistics*" on the 10th May 2021.¹⁶
- 5.43 That concluded that estimating population is not straightforward and figures are challenging to produce. It was recognised that projections use past estimates and that such data is important in policy making. It was also suggested that ONS takes a sensible approach to population estimates but that they may miss the 'bigger picture' of what the population data informs; it was suggested that ONS should be more open to reflecting any local challenges highlighted and that any feedback should be used to help sense check the official figures. Overall it was concluded that ONS should a)

¹⁴ See <https://www.cprewarwickshire.org.uk/local-planning-matters/coventry-city-council/coventry-news/>

¹⁵ <https://osr.statisticsauthority.gov.uk/correspondence/sir-andrew-watson-to-ed-humpherson-and-sir-david-norgrove-population-projections-and-mid-year-population-estimates-for-coventry/>

¹⁶ <https://osr.statisticsauthority.gov.uk/publication/review-of-population-estimates-and-projections-produced-by-the-office-for-national-statistics/>

improve methods; b) enhance communication; and c) embrace challenge. The OSR asked for ONS to report back with its plans for addressing the findings in July 2021.

5.44 On the 29th July, ONS published its response setting out a work plan to address the OSR recommendations.¹⁷ 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.**

5.45 The ONS Report set out a number of recommendations. These included ensuring future population statistics are based on sound methods and suitable data (including a commitment to complete detailed case studies on cities with large student populations and also consider concerns raised about population estimates from administrative data). A further recommendation was to improve the transparency of approaches used and any changes to approaches. The full set of recommendations set out by ONS are listed below:

- R1: Ensuring future population statistics are based on sound methods and suitable data
- R2: Enhancing the transparency of developments concerning the quality of the statistics
- R3: Continuation of plans for the future of migration data
- R4: Enhancement of approach to quality assurance
- R5: Supporting users' understanding of the uncertainty associated with ONS statistics
- R6: Maximising the use of ONS variant projections
- R7: Ensuring that ONS statistics remain relevant to users
- R8: Increasing public value of ONS statistics and supporting their use

5.46 Whilst it is clear that the comments made about population estimates in Coventry have been taken seriously, it is also the case that **at this point no attempts have been made by ONS to amend either population estimates or the projections they feed into.** Indeed the ONS document discusses the use of 2021 Census data to understand how and why the estimates based on Census 2021 differ from those based on the mid-year estimates rolled forward from 2011. Whilst Census

17

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/futureplansforresearchonpopulationestimatesandprojections/2021-07-29>

data has now been published, and does confirm the population of Coventry to be significantly lower than previously estimated, ONS have not yet released revised MYE or any projections linked to this data.

5.47 Therefore, the situation currently is one where **there are question marks over the components of change data in Coventry but no official alternative**. The analysis set out in the subsequent sections of this report therefore seeks to consider a range of data that might help to provide a view about recent population growth. In doing this the analysis is also mindful of work carried out locally (and drawn on by CPRE in their initial correspondence with the OSR).

5.48 Again, as previously noted, the analysis below was undertaken prior to publication of the 2021 Census, but does help to demonstrate the exceptional circumstances relevant to demographic data for Coventry in particular.

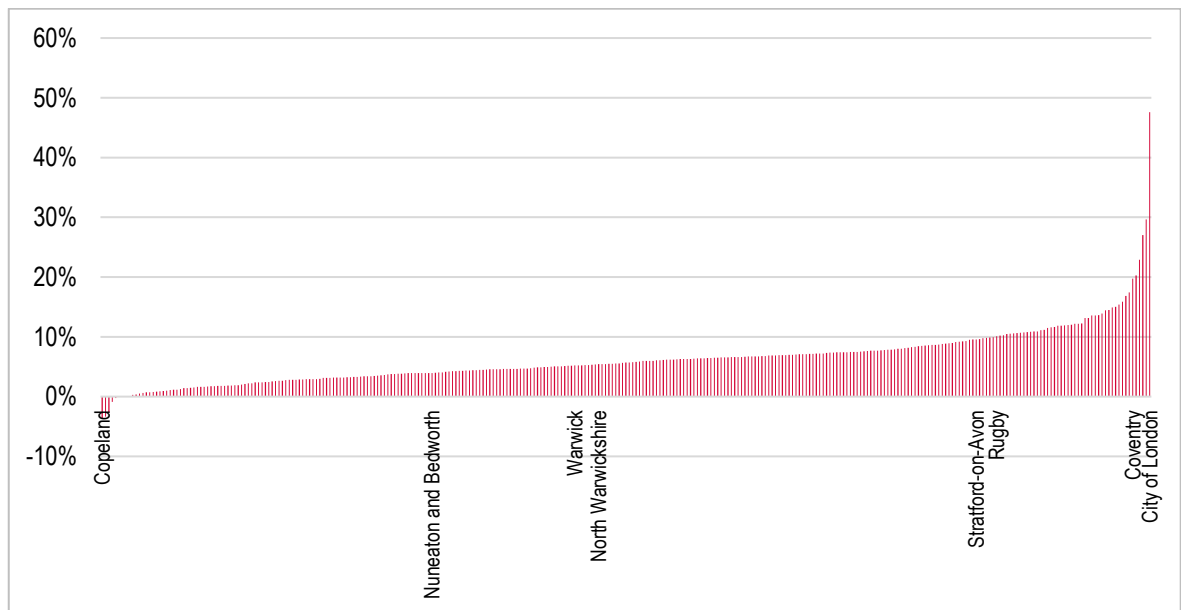
Overall Population Growth

5.49 The first analysis below seeks to put past population growth in Coventry in context with the rest of the country. The figure below shows estimates of percentage population growth for all local authorities in England over the 2011-20 period, with key areas being listed on the figure (including the highest and lowest growth and also the six authorities in this study area).

5.50 Overall, it can be seen that population growth in Coventry is very much at the top end of the scale. Indeed, ONS MYE only estimated five local authorities as having a higher recorded level of population growth than Coventry, and all of these were in Central London (listed below for clarity):

- Islington
- Westminster
- Camden
- Tower Hamlets
- City of London

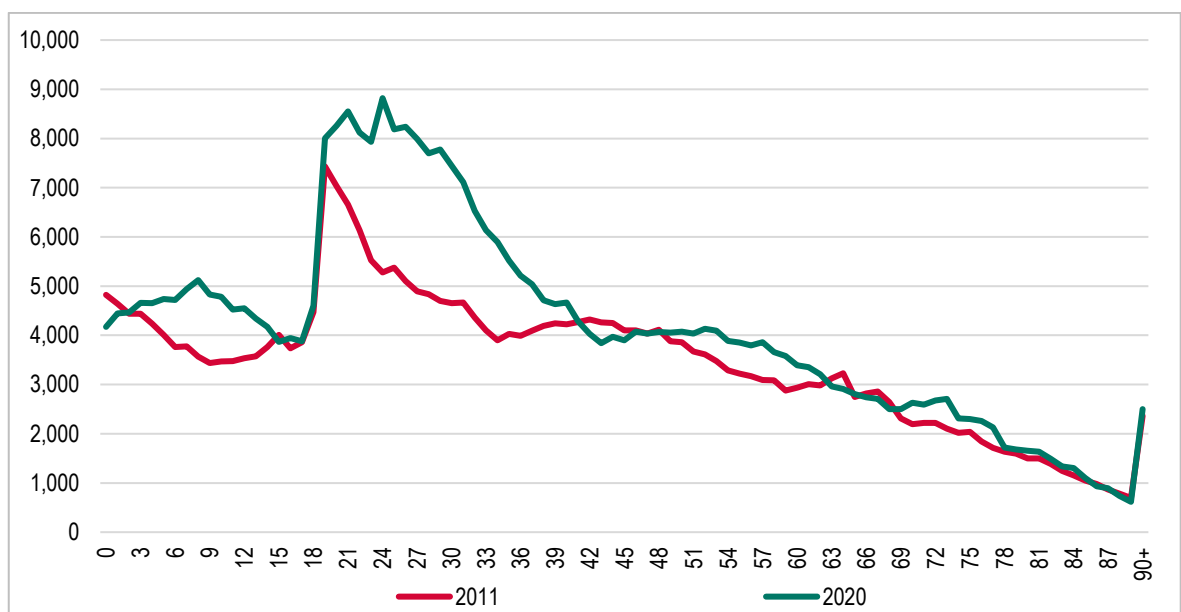
Figure 5.8: Estimated % Population Growth (2011-20) – all local authorities in England



Source: ONS MYE

5.51 It is of interest to understand which age groups have driven the population estimates. The main growth is thought to have been in age groups from about 20 onwards. Given the number of students in Coventry it looks as if ONS have recorded students and young people moving into the City, but not then recorded them moving out. 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.

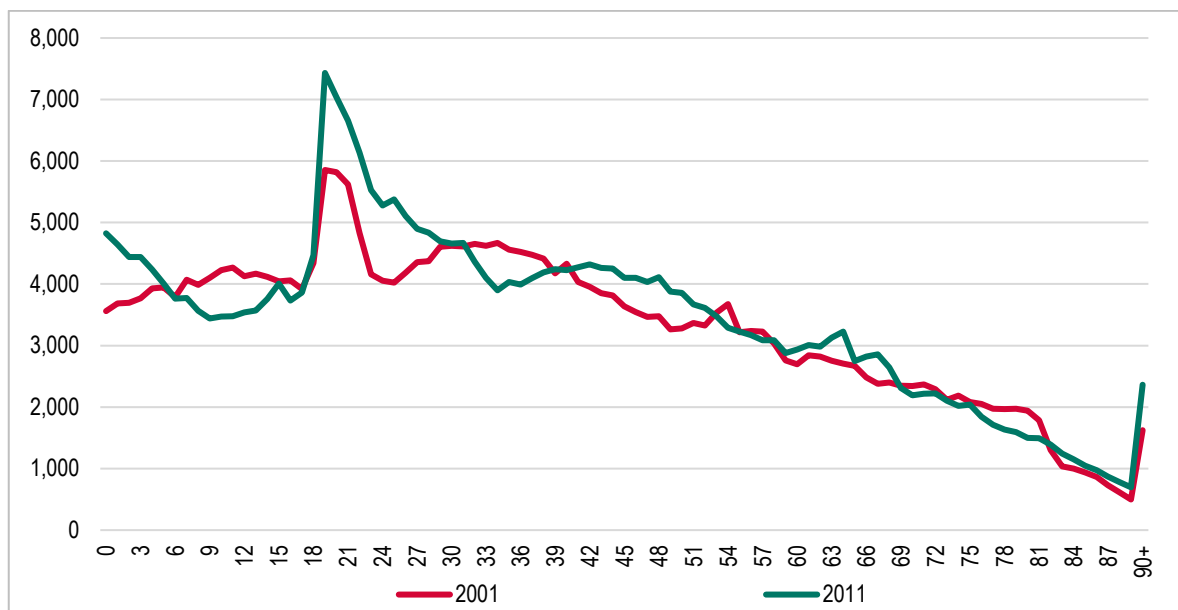
Figure 5.9: Population Age Structure in 2011 and 2020 – Coventry



Source: ONS Mid-Year Population Estimates

5.52 Firstly to look at this issue, analysis has been carried out to look at comparative population in the 2001-11 period. Data for 2011 will be data fixed by reference to the Census and should therefore have a reasonable degree of accuracy. When focussing on student age groups it can be seen that the general age structure in both 2011 and 2011 is similar, albeit in 2011, the number of people in key age groups is higher. Data for both 2001 and 2011 does point to a clear patterns of students moving to the City and then the majority leaving soon after their studies finish. It does however show growth of people in their 20s and in the 40s (with younger children) over the 2001-11 decade.

Figure 5.10: Age Structure (2011-20) – Coventry



Source: ONS Mid-Year Population Estimates

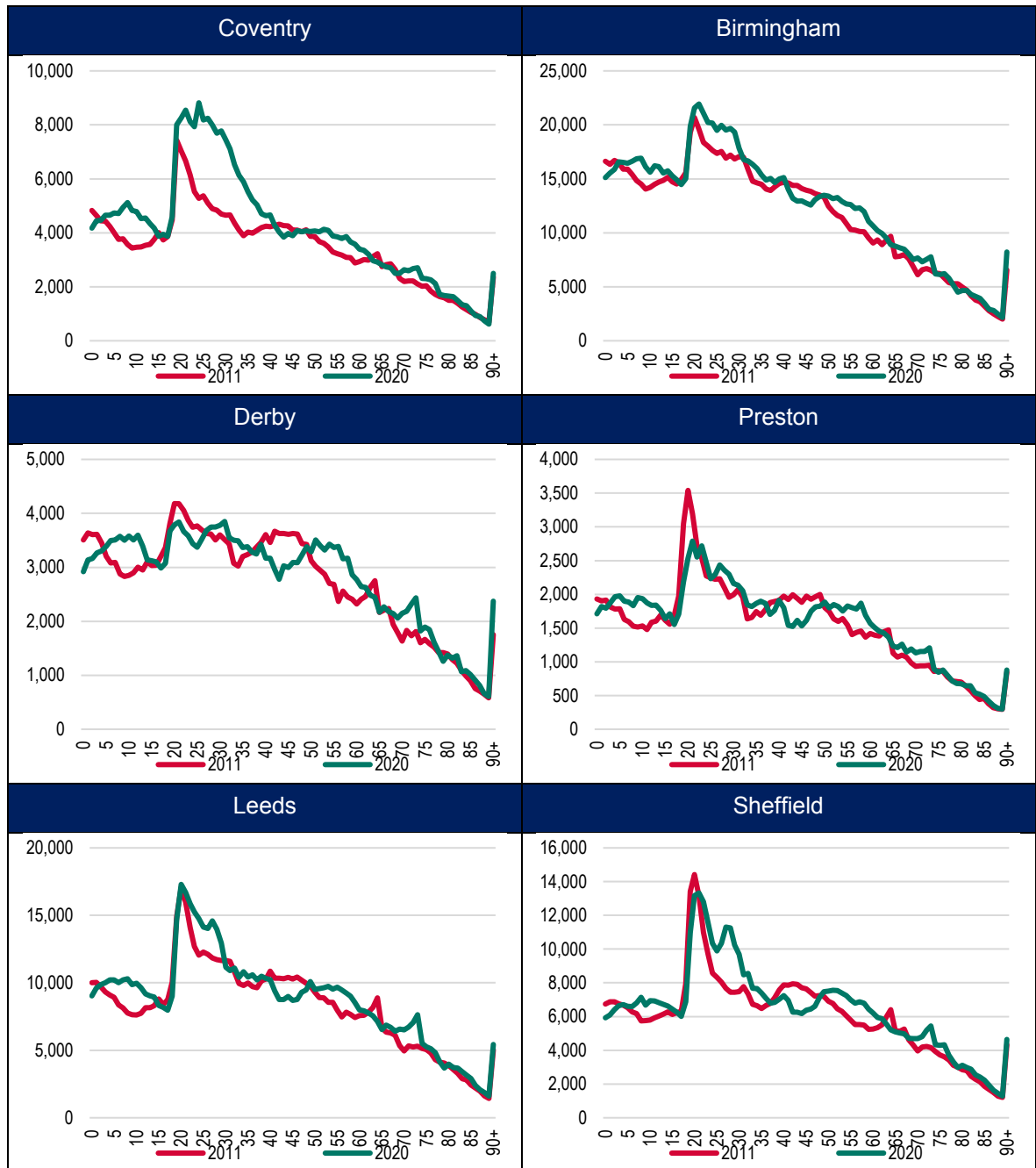
5.53 It is perhaps more interesting to compare Coventry with other similar authorities. Following the 2011 Census, ONS provided a list setting out the most similar authorities (in socio-economic terms) for each area. For Coventry, the most similar authorities were considered to be:

- Derby
- Preston
- Leeds
- Birmingham
- Sheffield

5.54 Whilst the ONS classification of similar is not just regarding student populations, it is the case that the five authorities listed above do all have notable student populations and can be considered as reasonable comparators.

5.55 The figure below plots the age structure in 2011 and 2020 for each of the above authorities (plus Coventry). From this it can be seen that **the projected age structure changes shown in Coventry are really quite different from any other location**. For all other areas there is a clear trend of students moving to the area and then leaving following completion of studies (although there does appear to be some degree of retention, albeit not on the scale seen in Coventry). This does point to there being a problem with the data for Coventry.

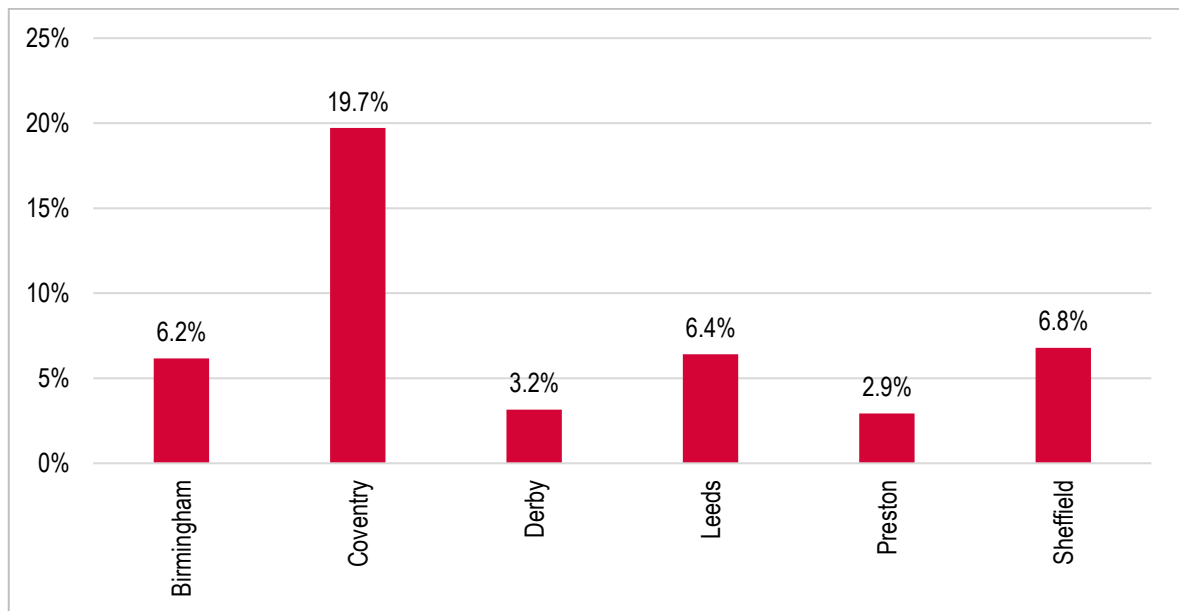
Figure 5.11: Estimated Population Change in Coventry and other 'Similar' Areas



Source: ONS Mid-Year Population Estimates

5.56 The figure below shows the overall estimated population growth in the 2011-20 period in each of the similar areas. This clearly shows population growth in the City has been substantially above that recorded in any other area. Indeed, at 19.7%, population growth is nearly three times the next highest area (Sheffield at 6.8%). Whilst it is clearly possible for Coventry to be growing faster than other locations, the differences are stark; given the comments above about how the age structure is estimated to have changed, there must be serious doubts about the validity of this level of population growth.

Figure 5.12: Population Growth (2011-20) in Coventry and 'Similar' Areas



Source: ONS

5.57 It would be theoretically possible that the population of Coventry has increased by as much as is estimated due to a high level of housebuilding, (i.e. if homes are provided then it provides an opportunity for people to move to the area and/or for people to remain living in the area). The table below shows that of the similar areas, Coventry does indeed have the highest net change to its dwelling stock, increasing by 8.6% over the 9-year period. However, unlike population estimates, this is not a substantially different level of dwelling growth to those seen in a number of the other similar cities. Preston saw stock increase by 7.5% but ONS has only recorded a 2.9% population increase. In Sheffield (which has the next highest level of population growth) dwelling stock has increased by 6.4%, lower than in Coventry, but a much smaller difference when compared with population data.

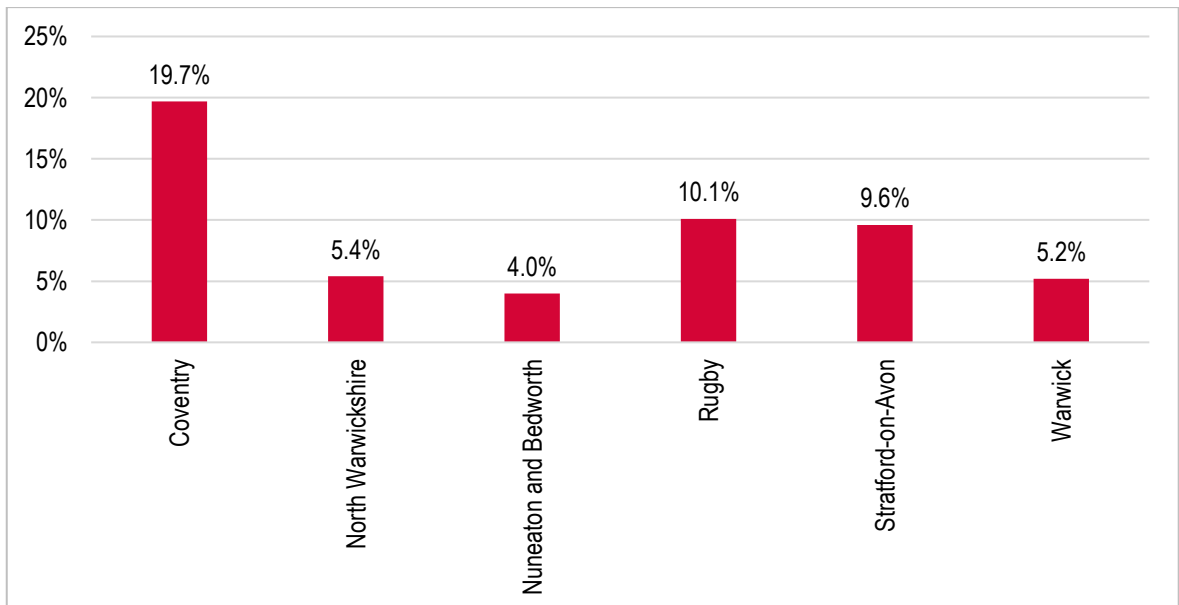
Table 5.8 Dwelling Stock Growth (2011-20) – Coventry and ‘Similar’ Areas

	Birmingham	Coventry	Derby	Preston	Leeds	Sheffield
2011	423,633	132,891	106,509	60,337	331,819	236,811
2012	424,820	133,803	106,770	60,513	333,750	237,244
2013	426,192	134,782	107,143	60,613	335,308	238,005
2014	427,790	135,871	107,590	60,774	337,537	238,922
2015	429,599	136,980	108,018	61,289	339,516	240,687
2016	432,438	138,386	108,502	61,773	341,990	242,276
2017	434,189	139,515	109,291	62,577	344,814	244,524
2018	437,349	140,610	110,078	63,315	347,097	246,828
2019	441,536	142,109	110,687	64,100	350,524	248,804
2020	445,276	144,350	111,227	64,847	353,857	251,887
Change (11-20)	21,643	11,459	4,718	4,510	22,038	15,076
% change	5.1%	8.6%	4.4%	7.5%	6.6%	6.4%

Source: MHCLG Live Table 125

5.58 As well as looking at Coventry compared with ‘similar’ areas, our analysis has looked across the HMA with the figure and table below showing population growth and the dwelling stock change. As with the previous comparison, the data for Coventry looks to be out-of-kilter with population growth being roughly double the next highest area (Rugby) but yet the change in dwellings is higher in three of the areas (Stratford-on-Avon, Rugby and Warwick).

Figure 5.13: Population Growth (2011-20) across Coventry and Warwickshire



Source: ONS

Table 5.9 Dwelling Stock Growth (2011-20) – Coventry and Warwickshire

	Coventry	North Warwickshire	Nuneaton and Bedworth	Rugby	Stratford-on-Avon	Warwick
2011	132,891	27,033	54,167	43,192	54,781	60,427
2012	133,803	27,115	54,406	43,520	54,936	60,563
2013	134,782	27,153	54,685	43,854	55,304	60,728
2014	135,871	27,208	54,838	44,249	55,634	60,952
2015	136,980	27,408	55,240	44,681	56,342	61,576
2016	138,386	27,616	55,652	45,215	57,400	62,201
2017	139,515	27,942	56,052	45,596	58,619	63,261
2018	140,610	28,169	56,549	46,174	59,955	64,160
2019	142,109	28,506	57,197	47,113	61,363	65,121
2020	144,350	28,721	57,816	47,984	62,705	66,157
Change (11-20)	11,459	1,688	3,649	4,792	7,924	5,730
% change	8.6%	6.2%	6.7%	11.1%	14.5%	9.5%

Source: MHCLG Live Table 125

Electoral Register

- 5.59 A further piece of analysis is to look at the number of people on the Electoral Register. Given that the ONS MYE suggest that much of the population growth in Coventry is of people aged 16 and over, it might be expected that the number of people registered to vote would also have increased.
- 5.60 The tables below show the number of people on the register and compares this with a number of other areas – the first table compares Coventry with Warwickshire and England, with the second table showing data for each of the individual local authorities. The first table shows that the number of people registered in Coventry has actually fallen in the 2011-20 period, whilst for Warwickshire there was a 5.4% increase, this is a higher increase than seen nationally.

Table 5.10 Persons on Electoral Register (2011-20) – Coventry, Warwickshire and England

	Coventry	Warwickshire	England
2011	227,296	410,420	38,654,024
2012	226,540	415,204	38,837,344
2013	221,669	411,458	38,597,137
2014	214,724	407,881	37,831,553
2015	210,031	401,316	37,399,942
2016	215,348	413,640	38,386,864
2017	214,219	419,347	38,693,859
2018	211,069	416,110	38,371,414
2019	218,047	420,800	39,476,140
2020	217,818	432,462	39,860,421
Change (11-20)	-9,478	22,042	1,206,397
% change	-4.2%	5.4%	3.1%

Source: ONS

5.61 When looking across local authorities it can be seen that most have seen an increase in the Electoral Register, including over 10% increase in the case of Warwick. North Warwickshire saw a small decline, but much lower than the decline recorded for Coventry. Again this evidence points to population growth in Coventry as being likely to be somewhat lower than recorded by ONS. The growth in those on the electoral roll in Warwick in comparison looks high relative to the population growth shown in the ONS MYEs.

Table 5.11 Number of people on Electoral Register (2011-20) – Coventry and Warwickshire Authorities

	Coventry	North Warwickshire	Nuneaton and Bedworth	Rugby	Stratford-on-Avon	Warwick
2011	227,296	49,788	94,713	72,426	95,227	98,266
2012	226,540	49,987	95,735	73,069	96,193	100,220
2013	221,669	49,456	94,069	73,362	96,494	98,077
2014	214,724	48,520	92,436	73,393	95,396	98,136
2015	210,031	47,339	90,571	71,187	94,292	97,927
2016	215,348	48,761	93,023	73,539	97,284	101,033
2017	214,219	48,994	94,409	74,005	97,272	104,667
2018	211,069	48,511	93,870	73,330	97,515	102,884
2019	218,047	48,421	94,623	74,224	99,096	104,436
2020	217,818	49,542	96,134	75,851	102,450	108,485
Change (11-20)	-9,478	-246	1,421	3,425	7,223	10,219
% change	-4.2%	-0.5%	1.5%	4.7%	7.6%	10.4%

Source: ONS

The Patient Register

- 5.62 A further source of population estimates is the Patients Register (PR). The table below shows estimated population growth in both the MYE and the.
- 5.63 For Coventry that the MYE is showing a notably higher level of population growth than the PR. This is the complete opposite to the trend seen in all other areas. Generally, in the 2011-20 period the PR shows proportionate population growth that is about 50% higher than the MYE, but in Coventry the PR is about 25% lower. This would again potentially point to population estimates in Coventry being over-estimated, this area is clearly out-of-line with the other studied.
- 5.64 It will also be noted that the PR consistently shows a higher population than the MYE, this is to be expected as the PR is reliant on people unregistering with a GP when joining a new one. Therefore the actual levels of population should be treated with some caution, but the growth trends can be seen as indicating relative changes across areas.

Table 5.12 Comparing ONS Mid-Year Population Estimates with Estimates of Population from the Patient Register

		2011	2020	Change	% change
Coventry	MYE	316,920	379,430	62,510	19.7%
	Patient Register	344,060	397,000	52,940	15.4%
Warwickshire	MYE	546,560	583,820	37,260	6.8%
	Patient Register	563,960	623,250	59,290	10.5%
West Midlands	MYE	5,608,680	5,961,970	353,290	6.3%
	Patient Register	5,807,710	6,350,570	542,860	9.3%
England	MYE	53,107,200	56,550,160	3,442,960	6.5%
	Patient Register	55,312,750	60,870,990	5,558,240	10.0%

Source: ONS

- 5.65 The table below shows the same information for each of the local authorities in the HMA. In all cases (apart from Coventry) the PR shows higher estimated population growth, although there are some differences in terms of the gap between the two.

Table 5.13 Comparing ONS mid-year population estimates with estimates of population from the Patient Register – local authorities

		2011	2020	Change	% change
Coventry	MYE	316,920	379,430	62,510	19.7%
	Patient Register	344,060	397,000	52,940	15.4%
North Warwks	MYE	62,110	65,520	3,410	5.5%
	Patient Register	63,580	67,380	3,800	6.0%
N & B	MYE	125,440	130,410	4,970	4.0%
	Patient Register	129,220	139,780	10,560	8.2%
Rugby	MYE	100,500	110,670	10,170	10.1%
	Patient Register	103,290	119,120	15,830	15.3%
SoA	MYE	120,830	132,410	11,580	9.6%
	Patient Register	127,540	141,480	13,940	10.9%
Warwick	MYE	137,760	144,910	7,150	5.2%
	Patient Register	140,350	155,600	15,250	10.9%

Source: ONS

5.66 Additionally on the topic of the Patient Register it is worth briefly considering if the trends seen in Coventry are simply due to the nature of the area and the table below shows the same analysis as above, but with comparisons to the 'most similar' authorities. Again it can be seen that all areas (apart from Coventry) see higher estimated growth in the Patient Register than the MYE. This would point to this being a specific issue for Coventry rather than being linked to the type of area (e.g. an area with a large student population).

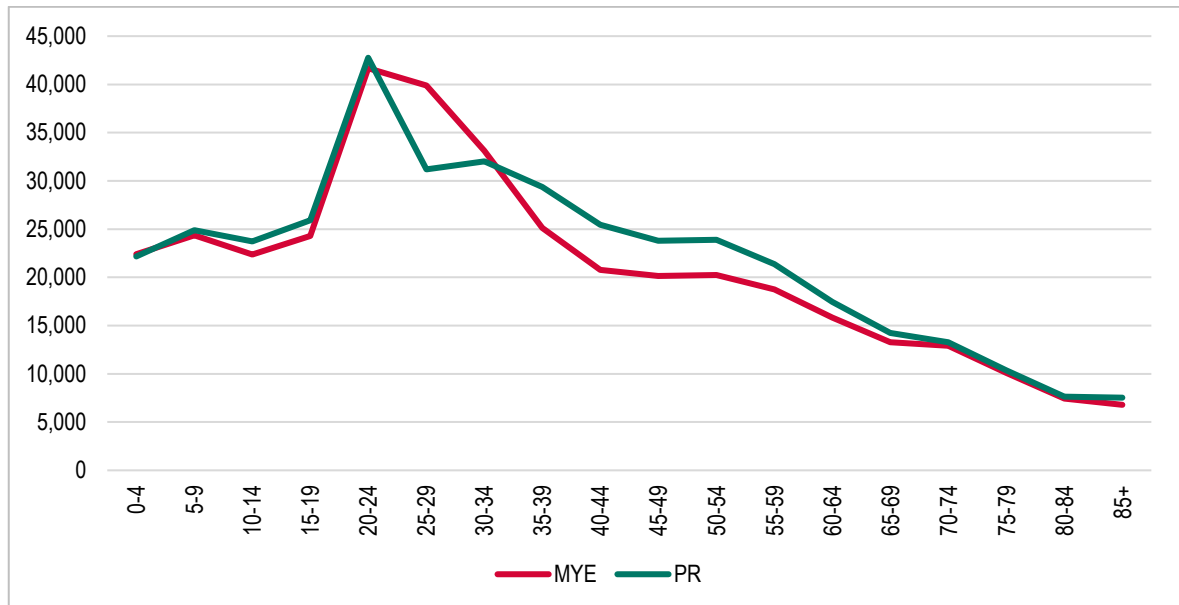
Table 5.14 Comparing ONS Mid-Year Population Estimates with estimates of Population from the Patient Register – Coventry and similar areas

		2011	2020	Change	% change
Coventry	MYE	316,920	379,430	62,510	19.7%
	Patient Register	344,060	397,000	52,940	15.4%
Birmingham	MYE	1,074,290	1,140,550	66,260	6.2%
	Patient Register	1,146,670	1,297,090	150,420	13.1%
Derby	MYE	248,950	256,860	7,910	3.2%
	Patient Register	262,310	284,070	21,760	8.3%
Leeds	MYE	750,700	798,790	48,090	6.4%
	Patient Register	806,180	889,560	83,380	10.3%
Preston	MYE	140,070	144,160	4,090	2.9%
	Patient Register	149,480	162,590	13,110	8.8%
Sheffield	MYE	551,770	589,240	37,470	6.8%
	Patient Register	563,220	612,270	49,050	8.7%

Source: ONS

5.67 Finally, analysis is provided below to look at the age structure of the population in each of the MYE and PR (for 2020). This is shown in the figure below which shows the PR has a higher population estimate for most age groups; the main exception to this is for people aged 25-29, where the PR is some 8,700 people lower (for the 30-34 age group there is an 1,100 difference). This does strongly point to confirming earlier suspicions, in that the MYE is recoding people coming into the area (notably students) but has then not been very good at recording them moving out again.

Figure 5.14: Comparing estimated age structure in 2020 – Coventry (MYE and Patient Register)



Source: ONS

Other Comments on Population Dynamics in Coventry

5.68 The analysis above has looked in some detail at a range of sources to see if there is evidence of the population of Coventry as having been over-estimated in the 2011-20 period, and it is fair to say that all of the sources would support that conclusion. Below are a few further layers of analysis which also investigate this.

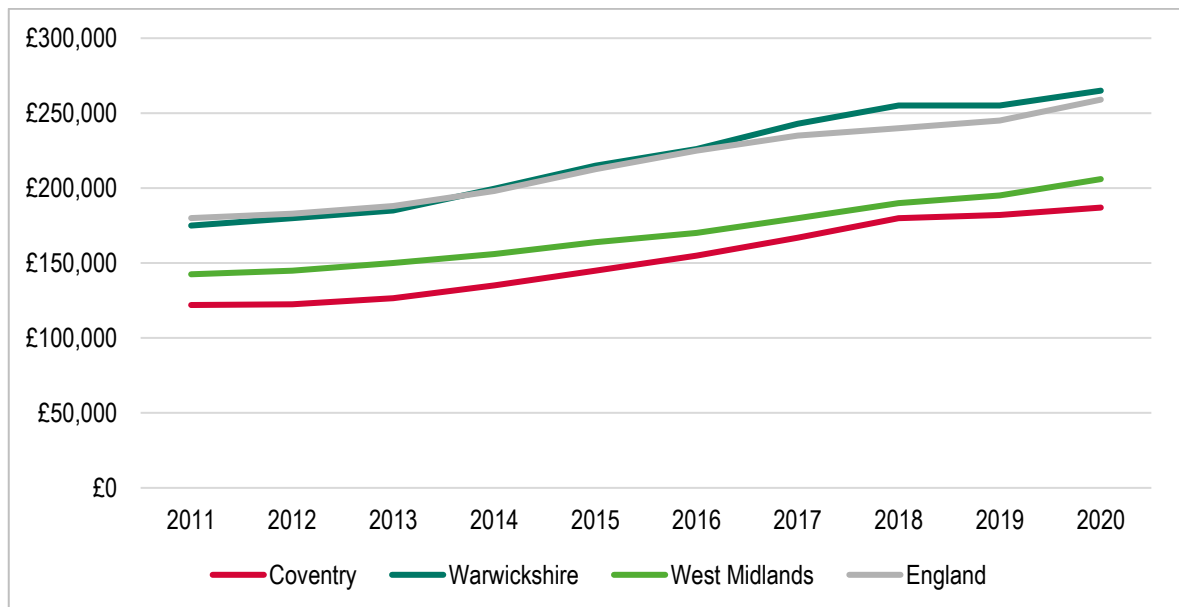
Continuation of UPC

5.69 Analysis earlier on in this section has noted that in the period from 2001 to 2011 ONS had to make a significant correction to their population estimates to bring them back in-line with the 2011 Census. In the 2011-20 period, ONS reduced previous estimates by a total of 14,946 people (1,495 per annum). Given the analysis above, it seems possible that the UPC error may have persisted beyond 2011, and indeed the Census has confirmed this (UPC potentially running at around 4,000 per annum in the 2011-21 period – see analysis below). The continuation of UPC would see a much lower estimated population in 2020 than currently in the MYE.

House Prices

5.70 If the population of Coventry has grown as significantly as suggested by ONS, 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 figure and table below show changes to the median house price from 2011 to 2020 in Coventry and a range of other areas. Over this period, the average price of a home in the City rose by 53%, which is actually slightly higher than seen in other locations. However, in actual cost terms the price increase is lower than seen across Warwickshire or nationally (and virtually identical to the West Midlands). Coventry remains in 2020 a more affordable place (in terms of average prices) than any of the comparison areas. This analysis again points to estimates of population potentially having been over-estimated.

Figure 5.15: Median House Prices (2011-20)



Source: ONS Small Area House Price Statistics (using HM Land Registry data)

Table 5.15 Median House Prices (2011-20)

	2011	2020	Change	% change
Coventry	£122,000	£187,000	£65,000	53%
Warwickshire	£175,000	£265,000	£90,000	51%
West Midlands	£142,500	£206,000	£63,500	45%
England	£180,000	£259,000	£79,000	44%

Source: ONS Small Area House Price Statistics (using HM Land Registry data)

Housing Register

5.71 A further analysis looks at the number of households on the Council's Housing Register (households seeking affordable housing). It is possible with the high estimated population growth and limited housing delivery that more households would seek social/affordable housing. However, as can be

seen from the table below, the number of people on the register is lower in 2020 than it was in 2011; this is likely in part to be due to changes in allocation policies and therefore it is perhaps more interesting to note that register figures have been fairly stable (slightly declining) since 2014. This analysis suggests that whatever population growth Coventry has seen, it has not put any additional pressure on the social housing stock.

Table 5.16 Number of Households on Housing Register in Coventry

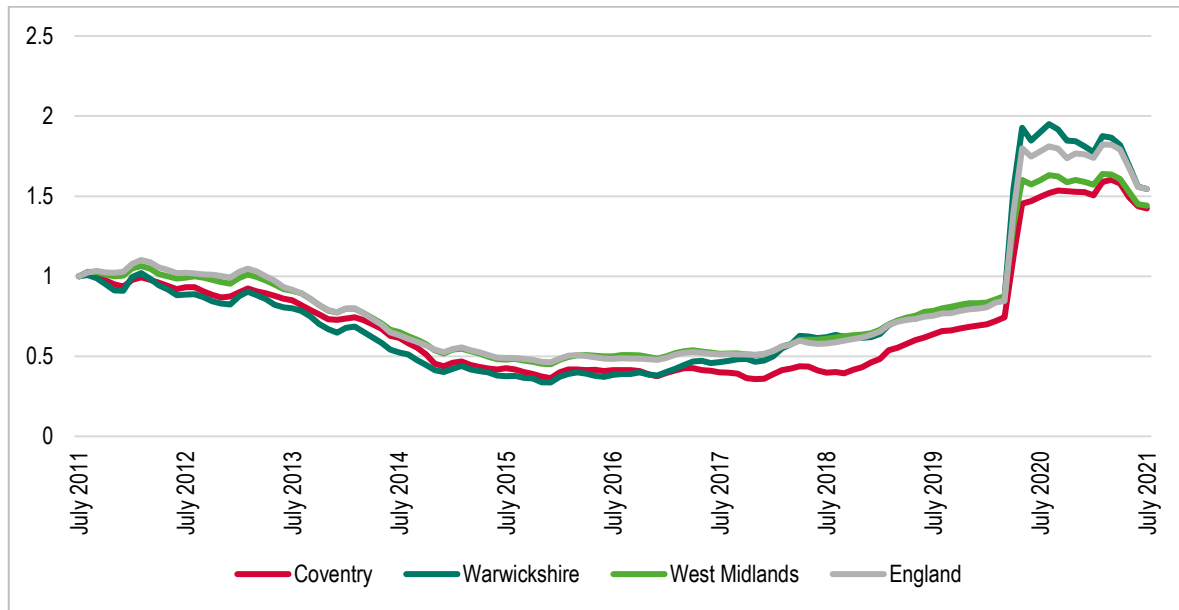
	Number of Register
2011	20,460
2012	22,718
2013	12,079
2014	14,360
2015	14,051
2016	14,030
2017	14,223
2018	13,632
2019	13,768
2020	13,608

Source: MHCLG Live Tables

Claimant Unemployment

5.72 Analysis has also been undertaken to look at Claimant Count data (described as the number of people claiming Jobseeker's Allowance plus those who claim Universal Credit who are out of work). In an area where population has been growing strongly, it might be expected that the number of claimants would also be increasing relative to other locations (if not then relative unemployment would be improving). As the figure below shows, the number of claimants in Coventry has broadly tracked that of other areas and in fact is now slightly lower (data has been standardised as of July 2011). This analysis again points to population growth in Coventry as not being exceptional.

Figure 5.16: Standardised number of out-of-work benefit claimants (2011-2021)



Source: ONS

Implications

- 5.73 The analysis above has looked at a range of sources to provide an indication of whether or not population growth in Coventry has been exceptional, and it is clear that none of the sources suggest that to be the case. It has previously been noted that CPRE undertook their own analysis of this issue, and this covered many of the analyses shown above. In addition, the CPRE work considered gas and electric use, school admissions, car registrations, A&E attendance and household waste. This report does not seek to replicate the CPRE analysis, but it is worth noting that all of the work carried out again points to population growth in Coventry as having been less significant than suggested in the ONS MYE – a point subsequently confirmed by the 2021 Census.

Estimating Coventry's Population in 2020

- 5.74 The analysis above clearly points to estimates of population in Coventry as having been over-estimated in the period since 2011 – a point confirmed by the 2021 Census. However, none of the sources accessed provide an alternative figure. Providing an accurate estimate of trends is more challenging, and the below analysis therefore works and seeks to triangulate through a number of alternatives to test what the population (and age structure) might be. It should again be noted that the analysis below was completed prior to publication of the 2021 Census, but has been included as it does provide a comparative position.
- 5.75 From the range of secondary data sources two methods were used to develop a population estimate. These are:

-
- a) Linking to dwelling completions as noted that population growth in Coventry (from the MYE) looks to be very high when set against the more modest level of completions with other data (e.g. house prices) not suggesting that there is now an additional imbalance in the housing market. Therefore analysis has been developed to look at what level of population growth might have occurred given the number of additional homes delivered.
- b) Linking to the Patient Register – generally there seems to be a fairly consistent relationship between estimates of population growth in the PR and the MYE, with all areas studied in this report showing higher proportional growth in the Patient Register. The exception to this is Coventry, where the opposite pattern is recorded. An estimate of population for Coventry has been made using the PR data by applying both the regional and national relationship between PR and MYE

Estimates based on Dwelling Completions

- 5.76 In this method a population projection has been developed that starts with the MYE as published (data on births, deaths and migration) but allows for the underlying levels of migration to flex so as to provide a different level of population growth. Data from both the 2014- and 2018-based subnational household projections (SNHP) has been applied (data about household representative rates and institutional population) – this allows an indication of the level of household growth that might be expected and to this a standard vacancy allowance (of 3%) is applied to derive estimates of the change in the number of dwellings.
- 5.77 The first analysis looks to see what level of dwelling completions the MYE as published could have supported and it will be remembered from earlier that Coventry has seen a dwelling increase of 11,459 in the 2011-20 period. Modelling the MYE gives dwelling growth of 23,200 (linking to the 2018-SNHP) and 25,900 (linking to the 2014-SNHP). Clearly it is possible that the household representative rates in both of the SNHP releases are substantially wrong, but the difference in these figures is significant and is likely to a considerable degree be linked to an over-estimation of population in the City.
- 5.78 The alternative analysis looks at what population growth might have occurred if the SNHP is reasonable and 11,459 additional dwellings have been provided (see Table 5.10). For this, migration levels in the MYE are adjusted so that dwelling growth is equal to this figure. This provides two estimates of the population in 2020 as set out below:
- Linked to 2018-SNHP = 347,941
 - Linked to 2014-SNHP = 341,929

5.79 Clearly this method is still giving a range of suggestions about population, but in both cases the estimate is some way below the 379,387 in the MYE for 2020.

Patient Register

5.80 For the Patient Register analysis account is taken of the relationship regionally and nationally between the PR and the MYE. It will be remembered at a regional level that the PR showed a 9.3% population increase and the MYE was 6.3% - therefore the MYE is about 67% of the PR. At a national level the equivalent figures were 10.0% and 6.5% giving a ratio of around 65%.

5.81 For Coventry, and to get an idea of likely population in 2020, the estimated population (for 2020) in the Patient Register data is multiplied by each of the regional and national ratios to give an idea of population. The estimated figures are:

- Linked to regional data = 349,781
- Linked to national data = 348,381

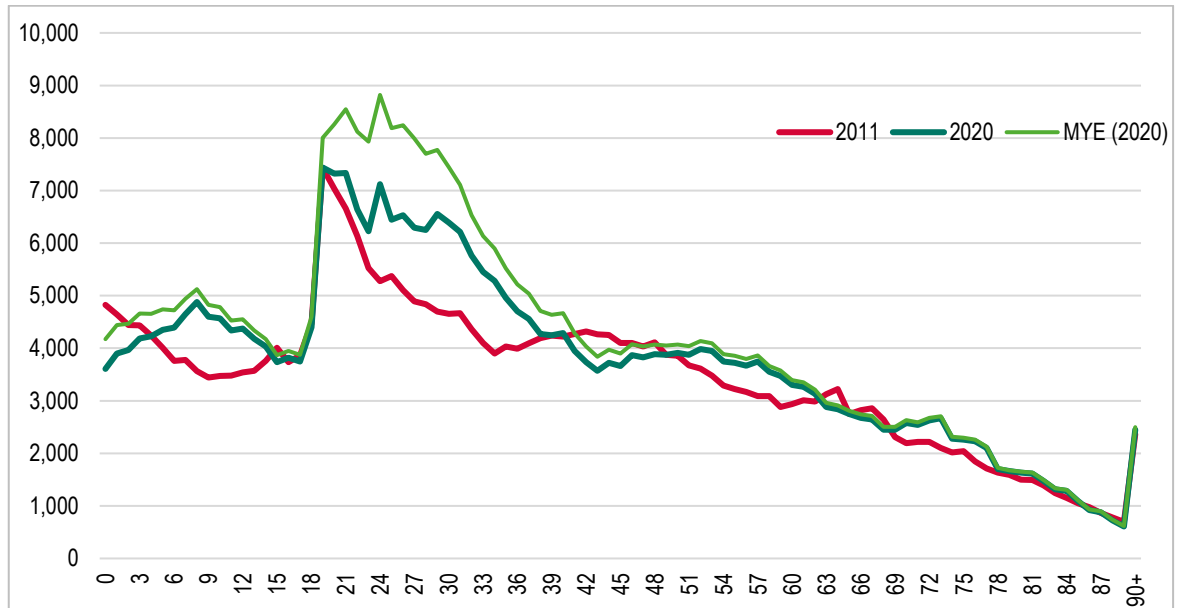
5.82 As with the estimates made from applying a projections method, the population estimated through this method is somewhat lower than the ONS MYE and it is also notable that these estimates are similar in scale to the upper end of the figures derived from the dwelling-led projection methodology.

Overall Estimate

5.83 The scenarios above provide a set of parameters for Coventry's population in 2020. It does not seem reasonable to pick any one of these scenarios as preferable to another and therefore for the purposes of this report a simple average of the four has been used as a best estimate of the population of the City. Therefore, it is estimated that the population of Coventry in 2020 is 347,000.

5.84 At this level of population a different age structure is generated when compared with the MYE and the figure below shows this estimated structure (and set against the MYE). 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.

Figure 5.17: Age structure of estimated population of Coventry in 2020 – contrast with 2011 and the MYE (for 2020)

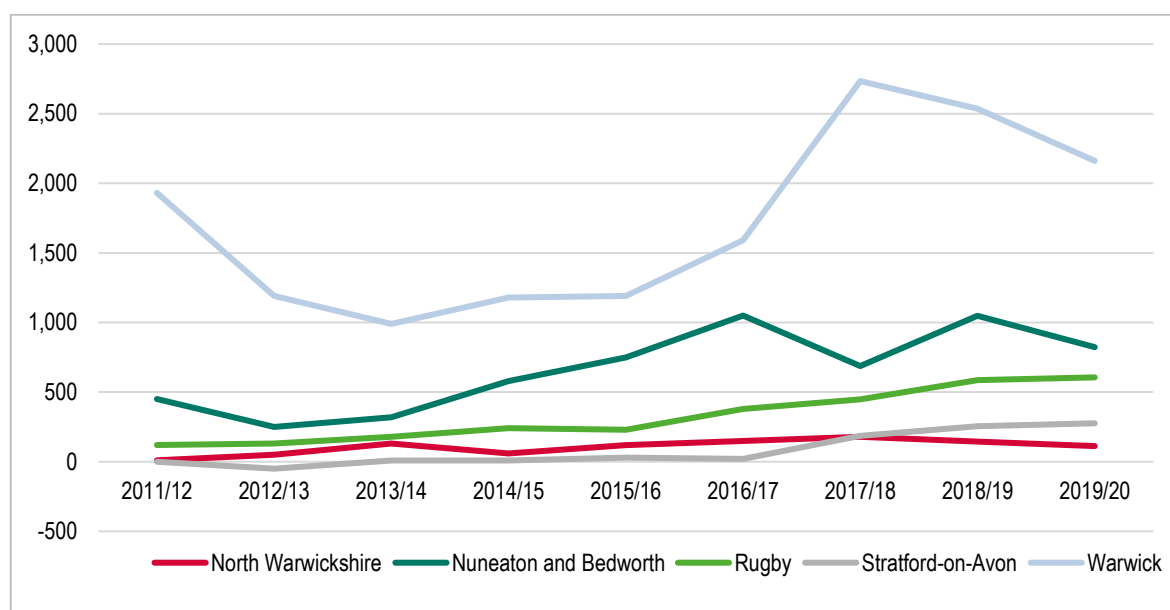


Source: ONS and demographic modelling

Population Estimates Across Warwickshire

- 5.85 Whilst this analysis has focussed on Coventry, it is also important to consider estimates of population in the other local authorities of the HMA. In particular, if the population of Coventry is over-estimated because ONS is failing to record people leaving the area then it is possible that those areas to which people are moving will have an under-estimated population.
- 5.86 The figure below shows levels of net migration from Coventry to each of the 5 Warwickshire local authorities, this should be treated as providing an indication of the strength of relationships rather than as actual figures (as it seems from the data above that moves from Coventry may well have been under-estimated). The figure shows that the strongest relationship is with Warwick, which has seen the highest level of net in-migration from Coventry for all years studied, this is followed by Nuneaton & Bedworth, although migration to this area is nowhere near as significant as for Warwick.

Figure 5.18: Estimated net migration from Coventry to each of the local authorities in Warwickshire



Source: ONS

5.87 Following the same methodology as for Coventry a series of population estimates for each of the Warwickshire authorities have been derived. The table below shows these estimates along with the original figures from the MYE (and also data for Coventry). Overall, it is estimated that the population of Coventry is around 32,400 people lower in 2020 than shown in the MYE; however, it is also estimated that the population of Warwickshire is likely to be slightly higher than the MYE (8,200 more people) – most of the difference in Warwickshire is accounted for by a higher population in Warwick.

Table 5.17 Estimated population of local authorities in Coventry & Warwickshire in 2020

	MYE (2020)	Estimated (2020)	Difference
Coventry	379,387	347,008	-32,379
North Warwickshire	65,452	64,878	-574
Nuneaton & Bedworth	130,373	132,093	1,720
Rugby	110,650	111,385	735
Stratford-on-Avon	132,402	134,063	1,661
Warwick	144,909	149,586	4,677
Coventry & Warwickshire	963,173	939,013	-24,160

Source: JGC Estimates

5.88 To provide some context, the table and figure below set out the percentage population growth the above figures amount to and also for comparison the proportionate increase in dwellings. Whilst there would not be expected to be a perfect relationship between dwelling growth and population change, some relationship can be expected. It is therefore notable that generally, the revised population figures do seem to be bringing dwelling growth and population growth more in-line.

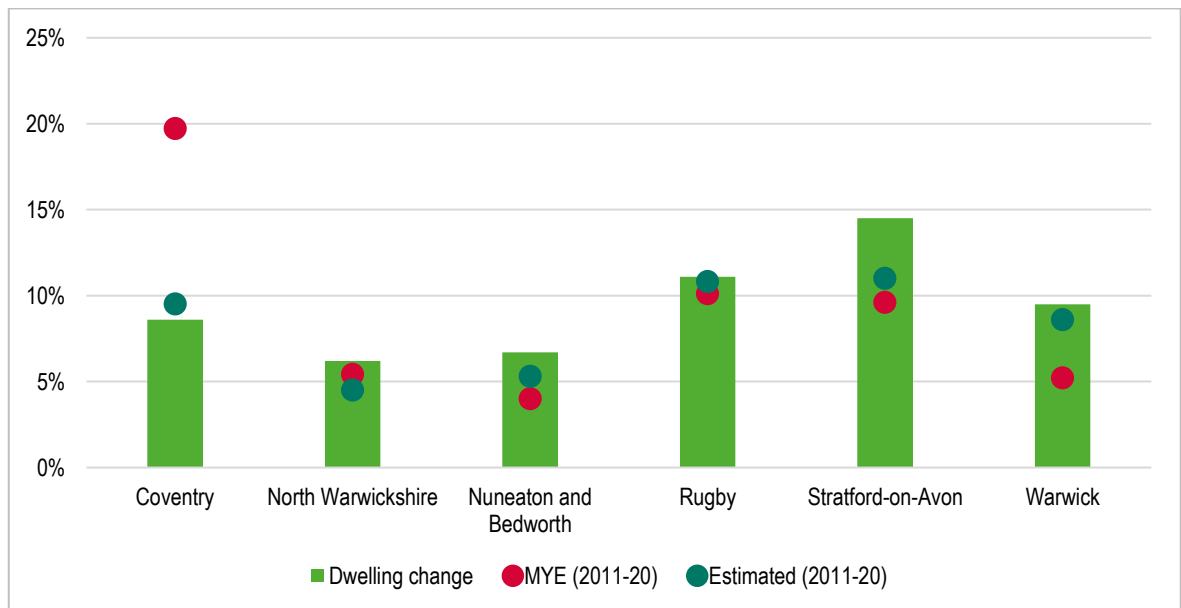
Table 5.18 Estimated percentage increase in population (2011-20) and increase in dwelling stock

	MYE (2011-20)	Estimated (2011-20)	Dwelling change
Coventry	19.7%	9.5%	8.6%
North Warwickshire	5.4%	4.5%	6.2%
Nuneaton & Bedworth	4.0%	5.3%	6.7%
Rugby	10.1%	10.8%	11.1%
Stratford-on-Avon	9.6%	11.0%	14.5%
Warwick	5.2%	8.6%	9.5%
Coventry & Warwickshire	11.5%	8.7%	9.5%

Source: JGC Estimates

5.89 The figure below shows this data. It is notable that whilst the estimated population of Coventry has been reduced substantially from the estimates in the MYE, it is still the only area where it is estimated that population growth (in percentage terms) is higher than dwelling growth. Just visually looking at this data, it is considered that the revised figures are likely to be a far more realistic view of population levels in 2020 than the MYE.

Figure 5.19: Comparing Estimated Population and Dwelling Stock Growth, 2011-20



Source: JGC Estimates based on a range of sources

Population Estimates and the 2021 Census

5.90 In the analysis above an estimate of population in 2020 was made based on a range of secondary data sources and prior to publication of the 2021 Census. Once the Census was released it was possible to compare figures from the two sources. To ensure a consistent base date (of 2021) the estimates presented above were rolled forward for a year based on estimated trends for the 2022-

20 period. Below a comparison is made with the Iceni estimates and the Census. For reference, a comparison is also provided with the latest ONS subnational population projections (SNPP).

- 5.91 The table below shows a total population from the Census of around 942,000 people, this is notably lower than had been projected by ONS in their most recent projections (some 26,000 people lower) and is also slightly lower than Iceni had estimated from a range of data sources (a difference of about 6,000 people). The data does however also show some notable age structure differences. Focussing on a comparison with Iceni, it can be seen that Iceni generally over-estimated the population of people aged 20-34 but under-estimated the 35-54 age group. Comparisons with the SNPP show the same pattern, but with some larger difference between sources (notably in the 20-29 age group).
- 5.92 It should be noted that this analysis is essentially assuming that the Census is correct and it is possible that there are issues with this data. This might particularly be due to the pandemic and potentially impact on students who may well have been recorded at a home address whereas they would normally be recorded as living in the location of their University. For the purposes of the analysis, the Census data is assumed to be broadly correct but some comments are made about the student population later in this section.

Table 5.19 Comparing population estimates and projections for 2021 – Coventry/Warwickshire HMA

	SNPP (2021)	Iceni (2021)	Census (2021)	Census difference from SNPP	Census difference from Iceni
0-4	54,100	52,100	51,400	-2,700	-700
5-9	58,300	57,400	56,000	-2,300	-1,400
10-14	57,800	57,300	56,700	-1,100	-600
15-19	55,300	55,100	57,400	2,100	2,300
20-24	73,800	70,000	63,500	-10,300	-6,500
25-29	75,500	69,500	60,400	-15,100	-9,100
30-34	70,400	68,000	65,700	-4,700	-2,300
35-39	61,200	60,000	62,300	1,100	2,300
40-44	56,200	55,200	58,400	2,200	3,200
45-49	56,900	56,400	58,900	2,000	2,500
50-54	61,700	61,300	64,500	2,800	3,200
55-59	60,400	60,400	61,900	1,500	1,500
60-64	51,800	51,800	52,100	300	300
65-69	44,200	43,900	44,500	300	600
70-74	45,100	44,900	45,300	200	400
75-79	36,700	36,600	35,600	-1,100	-1,000
80-84	24,600	24,500	24,500	-100	0
85+	24,100	23,600	23,000	-1,100	-600
TOTAL	967,900	947,900	942,100	-25,800	-5,800

Source: ONS and Iceni population modelling

5.93 The table below provides a summary of overall population estimates from the various sources for all local authorities. This generally shows Iceni estimates to be fairly close to those now shown in the Census. The main differences are in Coventry and Warwick, where Iceni estimated a higher population than the Census – these are the two areas where the recording of students might be an issue.

Table 5.20 Comparing population estimates and projections for 2021 – local authorities

	SNPP (2021)	Iceni (2021)	Census (2021)	Census difference from SNPP	Census difference from Iceni
Coventry	386,800	350,900	345,300	-41,500	-5,600
N Warwks	66,300	65,300	65,000	-1,300	-300
N & B	130,600	133,100	134,200	3,600	1,100
Rugby	109,900	112,400	114,400	4,500	2,000
SoA	130,800	135,600	134,700	3,900	-900
Warwick	143,400	150,500	148,500	5,100	-2,000
C & W	967,900	947,900	942,100	-25,800	-5,800

Source: ONS and Iceni population modelling

Students in the 2021 Census

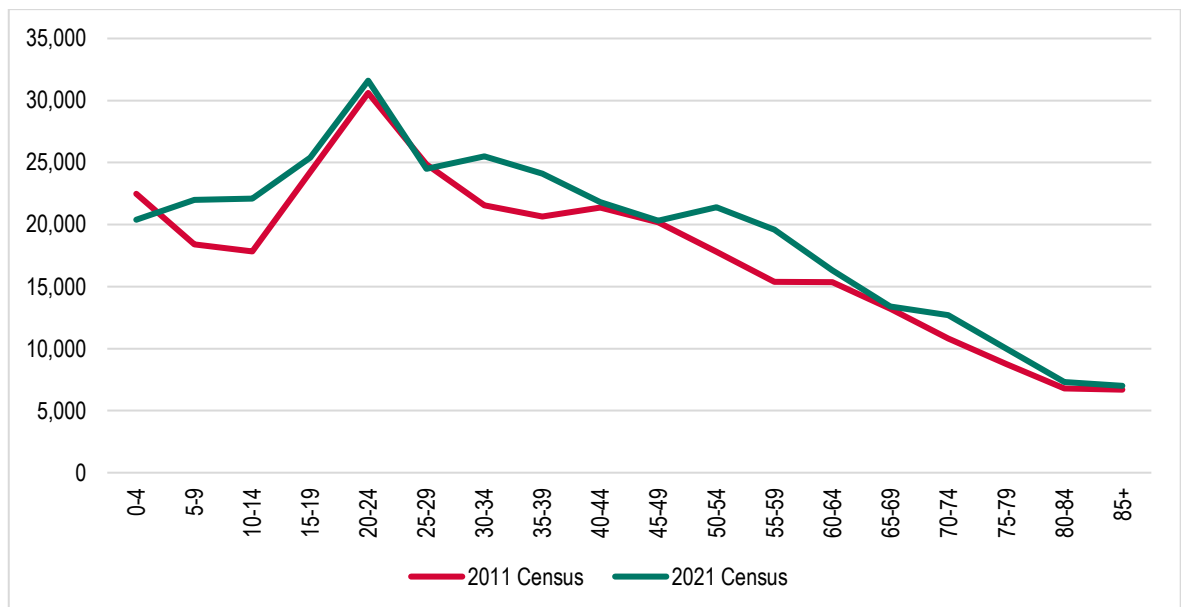
- 5.94 The analysis above showed population estimates made by IcenI prior to publication of the 2021 Census generally reflected the outcome of the Census. Two areas where IcenI showed a higher estimate (Coventry and Warwick) are also two areas with large student populations. Further analysis of the age structure in these locations (see below) reveals particular differences 20-24 and 25-29 age groups; groups in which a high proportion of students would be expected to be found.
- 5.95 In both areas, IcenI's estimates were higher than the Census, which led to the consideration of the possibility that some students who would normally be recorded as living in those local authorities were excluded. In considering this possibility, the timing of the Census was also a relevant factor with data having been collected during the pandemic – Census day (21st March 2021) was during a phased exit from lockdown.
- 5.96 The specific concern is that students who would normally be recorded as resident at their place of study were only recorded at their place of residence at the time (often back at family home) and this has an impact on the Census estimates. To try to study this possibility the tables and figures below show data from a range of sources. These are:
- ONS pre-Census population projection figures for 2021 (based on MYE to 2018);
 - IcenI pre-Census population estimates – based on MYE to 2020 and other sources of data such as the Patient Register; and
 - 2021 Census estimates.
- 5.97 Data on the age structure comparison has previously been included for Coventry and is not repeated below, although equivalent data is provided for Warwick. It can be seen in both key local authorities that the number of people aged 20-24 and 25-29 was much lower in the Census than previous estimates. The figures show a comparison of the age structure in each area for 2011 and 2021. For Coventry this shows a modest increase over the decade in the 20-24 age group and a modest decline for those aged 25-29. For Warwick, a decrease is seen in the 20-24 age group and a modest increase for those aged 25-29.
- 5.98 Overall, the analysis shows little change in the number of people in typical student age groups, but over a period when student numbers are recorded as having increased (particularly for Coventry University).

Table 5.21 Comparing population estimates and projections for 2021 – Warwick

	SNPP (2021)	Iceni (2021)	Census (2021)	Census difference from SNPP	Census difference from Iceni
0-4	7,300	7,900	7,400	100	-500
5-9	7,800	8,200	8,200	400	0
10-14	8,000	8,200	8,100	100	-100
15-19	7,400	7,600	9,300	1,900	1,700
20-24	12,600	14,800	10,800	-1,800	-4,000
25-29	10,500	11,300	9,500	-1,000	-1,800
30-34	9,400	10,500	10,500	1,100	0
35-39	8,300	8,700	9,900	1,600	1,200
40-44	8,800	9,200	9,500	700	300
45-49	9,000	9,200	9,500	500	300
50-54	9,500	9,700	10,000	500	300
55-59	9,300	9,500	9,700	400	200
60-64	7,800	8,000	8,000	200	0
65-69	6,800	6,900	7,100	300	200
70-74	7,100	7,200	7,200	100	0
75-79	5,800	5,800	5,700	-100	-100
80-84	3,800	3,900	4,000	200	100
85+	4,200	4,200	4,000	-200	-200
TOTAL	143,400	150,500	148,500	5,100	-2,000

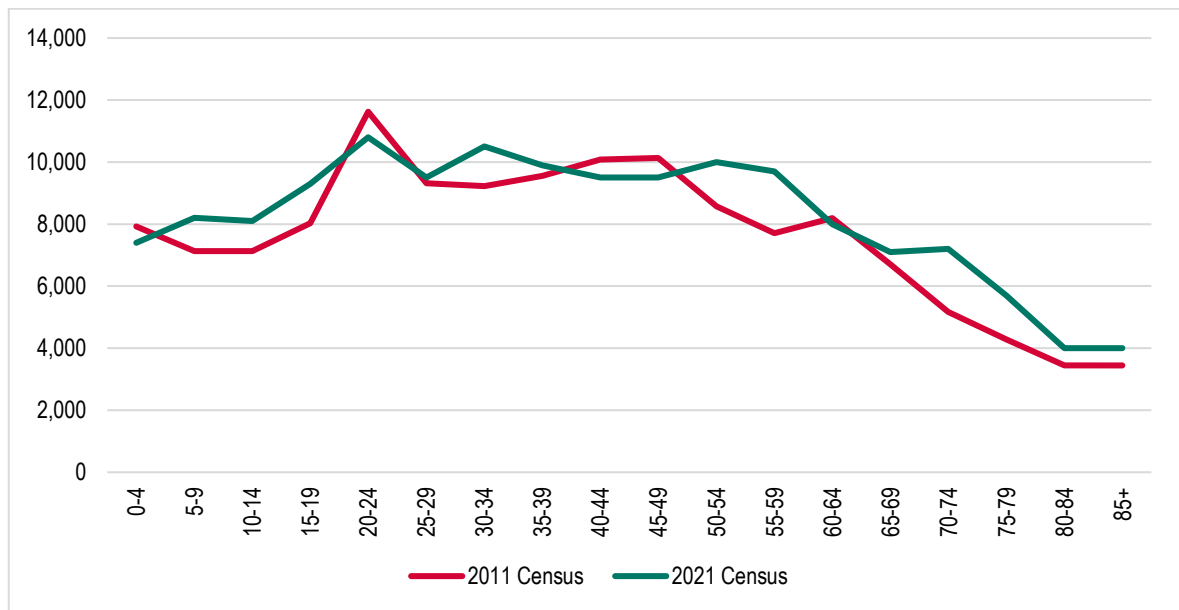
Source: ONS and Iceni population modelling

Figure 5.19: Comparing Estimated Population by age in 2011 and 2021 – Coventry



Source: ONS (Census)

Figure 5.19: Comparing Estimated Population by age in 2011 and 2021 – Warwick



Source: ONS (Census)

- 5.99 To try to understand to possibility of students having been missed by the Census, consultation was carried out with representatives of both Coventry and Warwick Universities with focus on the key question: ‘does it seem likely that some students have been missed from Census recording?’.
- 5.100 Warwick University noted there had been some contact with ONS about promoting the Census with students although this was essentially around encouragement to complete the form rather than any attempt to reflect ‘where’ it was completed. It was also commented that the 21st March was the day after term finished which could have meant some student who were in Warwick having left. I was however considered that the majority of overseas students who left during the pandemic are likely to have returned by Census day.
- 5.101 Coventry University were not aware of any discussion with ONS about student completion of the Census. They did note that due to COVID the University moved to a different model of delivery (more online) so there is a possibility that some students who would normally be expected to be resident near their place of study were not.
- 5.102 Overall, the two Universities agreed that it was ‘possible’ that some students who would normally have been resident in the area were not, and that they may have been missed out of the Census. However, there was no real way of confirming this or being able to quantify numbers.
- 5.103 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.

Base Census Population Trends

- 5.104 Analysis at the beginning of this section compared population estimates from the Census and other sources (notably the MYE). For the record, the tables below briefly study population change from these sources back to 2011. The MYE timeseries only has data to 2020 and so annual figures are provided for this comparison. The first table below looks at Census data and the second from the MYE. For the whole HMA the analysis shows much lower population growth recorded by the Census than in the MYE (8,000 per annum compared with 11,100 in the MYE). Virtually all of this difference is due to the Census showing lower population growth in Coventry, with all other areas (apart from North Warwickshire) showing higher growth in the Census than had previously been estimated.

Table 5.22 Population Change (2011-21) shown by Census data – Coventry-Warwickshire

	2011	2021	Change	Per annum
Coventry	316,960	345,300	28,340	2,834
North Warwickshire	62,014	65,000	2,986	299
Nuneaton and Bedworth	125,252	134,200	8,948	895
Rugby	100,075	114,400	14,325	1,433
Stratford-on-Avon	120,485	134,700	14,215	1,422
Warwick	137,648	148,500	10,852	1,085
Coventry & Warwickshire	862,434	942,100	79,666	7,967

Source: 2011 and 2021 Census

Table 5.23 Population Change (2011-20) shown by mid-year population estimates – Coventry-Warwickshire

	2011	2020	Change	Per annum
Coventry	316,915	379,387	62,472	6,941
North Warwickshire	62,089	65,452	3,363	374
Nuneaton and Bedworth	125,409	130,373	4,964	552
Rugby	100,496	110,650	10,154	1,128
Stratford-on-Avon	120,824	132,402	11,578	1,286
Warwick	137,736	144,909	7,173	797
Coventry & Warwickshire	863,469	963,173	99,704	11,078

Source: ONS MYE

- 5.105 Given a clear discrepancy between previous population estimates and the Census, and the fact that MYE data is used by ONS to develop projections, the opportunity has been taken to seek to develop a trend-based projection, taking account of the 2021 Census and also more recent data around fertility and mortality. The analysis also looks at likely recent migration trends, recognising that migration is likely to have been variable over the 2011-21 period. The projection takes two stages, firstly to develop a population projection and secondly to convert this into household estimates (which can then be used to consider overall housing need).

Developing Trend-based Population Projections in Coventry and Warwickshire

- 5.106 The purpose of this section is to develop trend-based population projections for the six local authorities in Coventry and Warwickshire. As noted, a key driver of 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.
- 5.107 Whilst for many areas, the ONS monitoring of population through the MYE looks to be similar to results now published from the Census there are many locations (notably Coventry) where there are clear discrepancies between previous estimates and the Census.
- 5.108 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. It should be noted that the projections are based on published data which in many cases (e.g. discrepancies between MYE and the Census) is likely to be incorrect and therefore has been used in the most realistic way possible.
- 5.109 That said, assumptions have needed to be made and it is considered that these projections are based on the best information available at the time of writing. Assumptions will need to be reviewed as appropriate following further publications of data from ONS, including a new MYE to 2021 and 2021-based subnational population projections (SNPP) – likely to be in 2023. In the next round of projections ONS will need to grapple with the same issues as raised in the analysis below, notably how to deal with past population estimates where Census data shows these to be substantially wrong.
- 5.110 A projection has been developed looking at estimated migration trends over the past 10-years. A 10-year period has been chosen as it aligns with the period between the two Census and makes adjustments based on estimates of Unattributable Population Change (UPC). The UPC is calculated over a 10-year period and in reality it is not known in which years it has arisen – therefore using a different trend period could over- or under-estimate population change and migration – and is therefore difficult to robustly achieve.
- 5.111 The use of 10-years also covers a full housing market cycle, which in the case of Coventry and Warwickshire will mean understanding data from both before and after the adoption of latest local plans¹⁸ and periods of stronger and weaker housing market conditions. Using longer trend periods was also something recommended by the Planning Advisory Service (PAS) prior to the introduction of the Standard Method. In the PAS technical advice note of July 2015 it is stated *'In assessing housing need it is generally advisable to test alternative scenarios based on a longer reference*

¹⁸ Housing delivery can often peak in the years following the adoption of new local plans

period... Other things being equal, a 10-to-15 year base period should provide more stable and more robust projections than the ONS's five years'.

5.112 Below we set out the general method used for each of the components and the outputs from a trend based projection. The example used is for Coventry (where the Census showed far lower growth between 2011 and 2021 than had previously been estimated by MYE) but can equally be applied for other areas, including those where population growth is shown to have been higher than previous estimates. The latest ONS projections are a 2018-based set of SNPP and whilst these are not directly used in the analysis, reference is made to allow comparisons between the ONS position (which was pre-Census) and projections developed below.

Fertility

5.113 For fertility it is the case that overestimating population will mean that fertility rates in the SNPP are too low (as ONS is essentially assuming a number of births to more people). To make an adjustment, the number of births for 2021/22 in the SNPP is used and then an estimate made of how many births the ONS rates would imply if the population age structure for 2021 is replaced as the base against which births are calculated. In the case of Coventry, the lower population in the Census would imply a much lower level of births than if the rates in the SNPP are used and so birth rates have been increased significantly (initially by around 25%).

- 2021/22 births SNPP – 4,852
- 2021/22 births updated population – 3,881
- Rate as % of SNPP – 125% (4,852/3,881)

5.114 The birth *rate* increases as births had been broadly properly recorded but the population had been over-estimated.

5.115 There is however some more recent data about births from the 2020 MYE which can be used to moderate this figure (noting that the SNPP on draws on data to 2018). In this case the actual number of births recorded is slightly lower than was projected in the SNPP so a small downward adjustment is made to the fertility rate.

- MYE births (2018-20) – 8,384
- SNPP birth (2018-20) – 9,326
- Adjustment – 90% (8,384/9,326)

5.116 The two adjustments are then multiplied to give a change to base fertility rates, this is around 112% (125% * 90%).

5.117 The table below shows the adjustments applied for all local authorities in the HMA. It can be seen for all areas apart from Coventry that these are in a downward direction, reflecting the general trend (including up to 2020) for birth rates to be falling as well as adjustments made for Census population estimates.

Table 5.24 Adjustments made to modelled fertility rates from 2018-based position

	Adjustments to SNPP fertility rates
Coventry	112%
North Warwickshire	94%
Nuneaton & Bedworth	97%
Rugby	89%
Stratford-on-Avon	95%
Warwick	89%

Source: Derived from ONS data

Mortality

5.118 The same issue arises with mortality, in that deaths recorded by MYE are applied to a different population than is now shown. Generally for mortality any adjustments are more minor than for fertility, this is because most deaths occur in older age, and generally the MYE is fairly good at estimating the size of the older person population (in part due to them being less likely to be migrants). In Coventry, the adjustment is in a downward direction, although only a 1% change from the SNPP position.

- 2021/22 deaths SNPP – 2,789
- 2021/22 deaths updated population – 2,769
- Rate as % of SNPP – 101% (2,789/2,769)

5.119 A similar adjustment to fertility is made to take account of death data to 2020 as shown below, when this data is taken into account the modelled adjustment sees rates being increased by about 9% from the SNPP position.

- MYE deaths (2018-20) – 5,920
- SNPP deaths (2018-20) – 5,441
- Adjustment – 109% (5,920/5,441)

5.120 Again, the two adjustments are multiplied to give a change to base mortality rates, this is around 110% (101% * 109%).

- 5.121 The table below shows the mortality adjustments applied for all local authorities in the County. It can be seen that all are in an upward direction, reflecting the general trend (including up to 2020) for death rates to not be improving at the rate previously projected (as well as adjustments made for Census population estimates).

Table 5.25 Adjustments made to modelled mortality rates from 2018-based position

	Adjustments to SNPP mortality rates
Coventry	110%
North Warwickshire	110%
Nuneaton & Bedworth	109%
Rugby	106%
Stratford-on-Avon	105%
Warwick	103%

Source: Derived from ONS data

Migration

- 5.122 When looking at migration our starting point is to consider how different migration has been over the 2011-21 period than was previously estimated by ONS. Essentially the difference in population growth between the two sources is likely to be attributable to migration, this is on the basis that it is expected that births and deaths have been fairly well recorded by ONS.
- 5.123 Analysis is slightly complicated by MYE data only being available to 2020 but the Census having a clear data point of 2021 (but not 2020). To try to provide as consistent a comparison as possible the MYE to 2020 has been used and the incremental change in the SNPP for 2020-21 added on to get to a 2021 estimate. Whilst this will be an estimate, the inclusion of just 1-year of data from the SNPP is unlikely to have any significant impact on the findings.
- 5.124 Again focussing on Coventry, the figures below shows the MYE and SNPP expected/projected population to have increased by 68,364 people in the 2011-21 period, whereas the Census now shows a change of 28,340 – this is a difference of 40,024. This would imply net migration has on average been about 4,000 people lower per annum over the decade to 2021 (40,024/10).

Table 5.26 Coventry – MYE and Census population estimates

	MYE/SNPP	Census
2011	316,915	316,960
2021	385,279	345,300
Change	68,364	28,340

Source: Derived from ONS data

5.125 For information, the table below shows the same figures for all authorities in the HMA, this clearly shows in most areas (Coventry and North Warwickshire excepted) that population figures shown by the Census are above previous estimates/projections. It will also be noted from the table that the two 2011 figures are slightly different, this is due to one being a mid-year figure and the other dated as of the Census (which was March). To provide a mid-year figure for 2021 based on the Census and adjustment has been made based on adjustments seen in 2011.

Table 5.27 MYE and Census population estimates – Coventry-Warwickshire authorities

		2011	2021	Change
Coventry	MYE/SNPP	316,915	385,279	68,364
	Census	316,960	345,300	28,340
North Warwickshire	MYE/SNPP	62,089	65,919	3,830
	Census	62,014	65,000	2,986
Nuneaton & Bedworth	MYE/SNPP	125,409	130,973	5,564
	Census	125,252	134,200	8,948
Rugby	MYE/SNPP	100,496	111,552	11,056
	Census	100,075	114,400	14,325
Stratford-on-Avon	MYE/SNPP	120,824	133,481	12,657
	Census	120,485	134,700	14,215
Warwick	MYE/SNPP	137,736	145,268	7,532
	Census	137,648	148,500	10,852
Coventry-Warwickshire	MYE/SNPP	863,469	972,472	109,003
	Census	862,434	942,100	79,666

Source: Derived from ONS data

5.126 It is not known if this difference in population growth (attributed to migration) is due to an underestimate of in-migration or an over-estimate of out-migration and in reality it is likely to be a combination of the two. For the purposes of modelling it has been assumed that the difference is split equally between these two components, for Coventry this would mean that in-migration was on average around 2,001 people per annum lower in the 2011-21 period and out-migration 2,001 people higher.

5.127 Analysis also seeks to determine a baseline starting position for both in- and out-migration and to do this data from MYE up to 2020 has been used (so covering a 10-year period 2010-20). The table below shows the average in- and out-migration over this period in Coventry and the adjustment made to take account of the difference previously shown between population estimates and the Census. Over the 2010-20 period ONS estimated an average net migration of 5,200 people each year, but the Census suggests this was around 4,000 lower and so the base position is net migration of about 1,200. In modelling in- and out-migration figures are treated separately but it is typically earlier to compare data when looking at net figures.

Table 5.28 Base estimate of migration – Coventry

	Average (2010-20)	Adjustment	Base position
In-migration	27,707	-2,001	25,705
Out-migration	22,507	2,001	24,508
Net migration	5,200	-4,002	1,197

Source: Derived from ONS data

5.128 Across the whole of the HMA, the start point net migration is estimated to be around 5,500 people per annum. Upward adjustments are made in all areas apart from Coventry and North Warwickshire, however the adjustment made for Coventry is such that overall the start point for net migration is notably below the level recorded by ONS for this period.

Table 5.29 Base estimate of migration – Coventry-Warwickshire

		In-migration	Out-migration	Net migration
Coventry	Average (2010-20)	27,707	22,507	5,200
	Adjustment	-2,001	2,001	-4,002
	Base position	25,705	24,508	1,197
North Warwickshire	Average (2010-20)	3,585	3,200	385
	Adjustment	-42	42	-84
	Base position	3,543	3,242	301
Nuneaton & Bedworth	Average (2010-20)	5,492	5,282	209
	Adjustment	169	-169	338
	Base position	5,661	5,113	548
Rugby	Average (2010-20)	5,785	4,960	825
	Adjustment	163	-163	327
	Base position	5,949	4,797	1,152
Stratford-on-Avon	Average (2010-20)	7,791	6,339	1,452
	Adjustment	78	-78	156
	Base position	7,869	6,261	1,607
Warwick	Average (2010-20)	10,175	9,850	324
	Adjustment	166	-166	332
	Base position	10,341	9,684	656
Coventry-Warwickshire	Average (2010-20)	-	-	8,395
	Adjustment	-	-	-2,934
	Base position	-	-	5,461

Source: Derived from ONS data

5.129 It is however not a simple process to just apply these uplifts for each year of the projection as migration can vary over time and each of in- and out-migration need to be considered separately.

In-Migration

- 5.130 Levels of in-migration will to some extent vary depending on the size of the population from which migrants will be drawn. If for example typically 10% of people in Area A move to Area B in any given year then the size of the population in Area A will impact on the actual numbers moving. If in year 1 there are 10,000 people in Area A then 1,000 would be expected to move to Area B, but if in year 2 the population is only 9,000 there would only be 900 movers.
- 5.131 The age structure will also have an influence on the number of moves as typically older people are less likely to be migrant and so an ageing population might see in-migration reduce over time, although an increasing population generally might be expected to see migration increase.
- 5.132 For the purposes of modelling we have considered the relationship between the national population and the projected number of in-migrants. The latest national projection is a 2020-based ONS publication.
- 5.133 Over time, population growth rates nationally are projected to fall (remaining positive but at a reducing rate) and this is in part (in early years) due to reducing levels of in-migration – although reductions in natural change have the greatest impact over the longer term. Overall, it is considered with an increasing population that levels of in-migration will increase over time but at a reducing rate. For the purposes of modelling it has been assumed that future in-migration will broadly track the midpoint between rates remaining in-line with national population change and the rates estimated for the 10-year period to 2020.
- 5.134 Whilst this is an assumption, it is considered to be broadly reasonable given the general direction of demographics both locally and nationally.

Out-migration

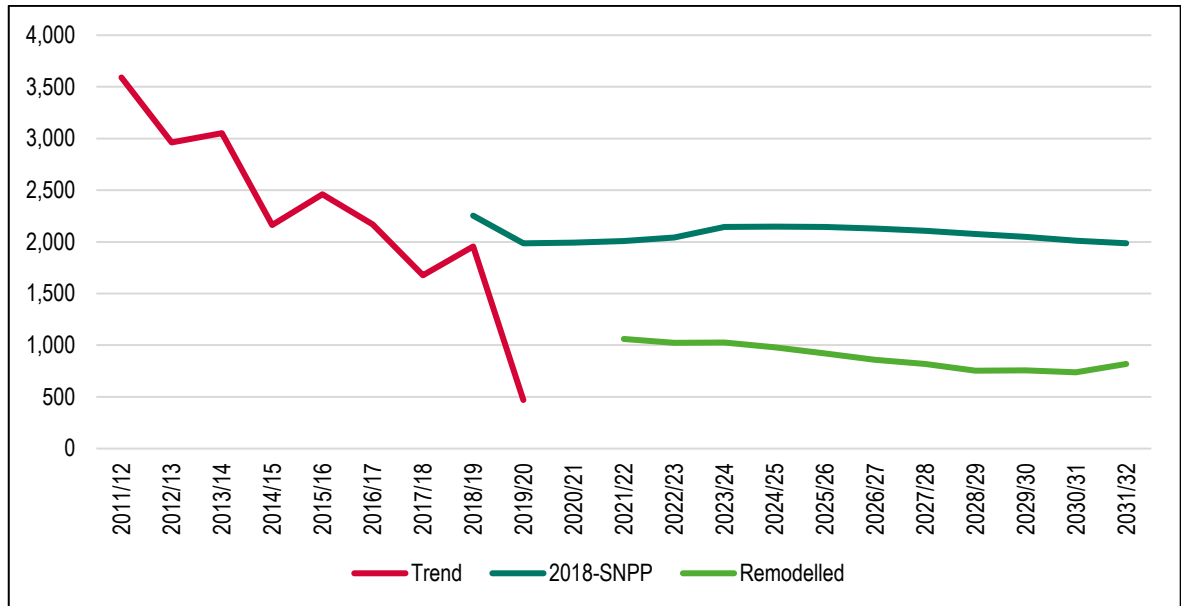
- 5.135 For out-migration, levels will vary depending on the size of the population in the area being studied. For example, if the population of Coventry grows at a faster rate than other locations then there is a larger pool of people from which out-migrants might be drawn. With a growing population, out-migration would therefore be expected to increase over time.
- 5.136 However, it is also noted that at a national level, out-migration in the early years of the projection is projected to fall, whilst a changing age structure (increasing older person population) will to some extent moderate any changes, as older people are less likely to be migrant.
- 5.137 Therefore a consistent method to that used for in-migration has been applied for out-migration, that is the estimated level of out-migration is set at the midpoint between estimated past levels of out-migration and the level that would be expected if the ratio between population growth and out-

migration were maintained. As before, this is an assumption, but is likely to be reasonable given the range of data available.

HMA-wide Projection Outputs

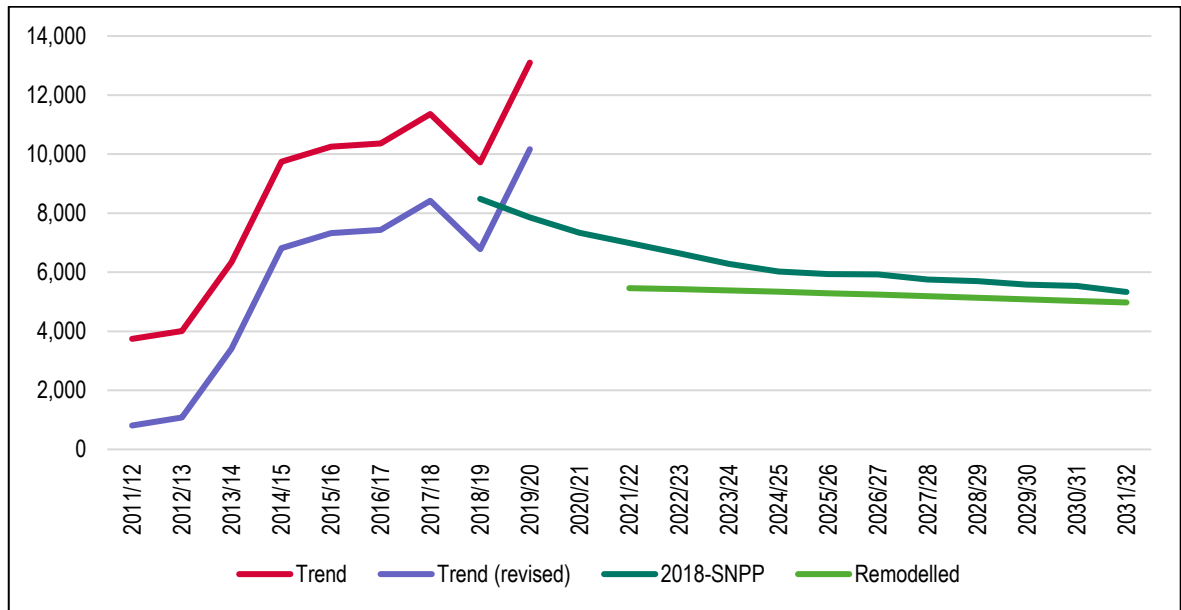
5.138 The above estimates of fertility, mortality and migration (including changes over time) have been modelled to develop a projection for the period to 2032 – this data being chosen as it is possible to develop an equivalent estimate of housing need using the framework of the Standard Method. Below are a series of charts showing key components of change and overall population change. Further tables provide summary information for each local authority. For contrast, data is compared with that from the 2018-based SNPP, that being the most recent projection released by ONS.

Figure 5.1: Past trends and projected natural change – Coventry-Warwickshire



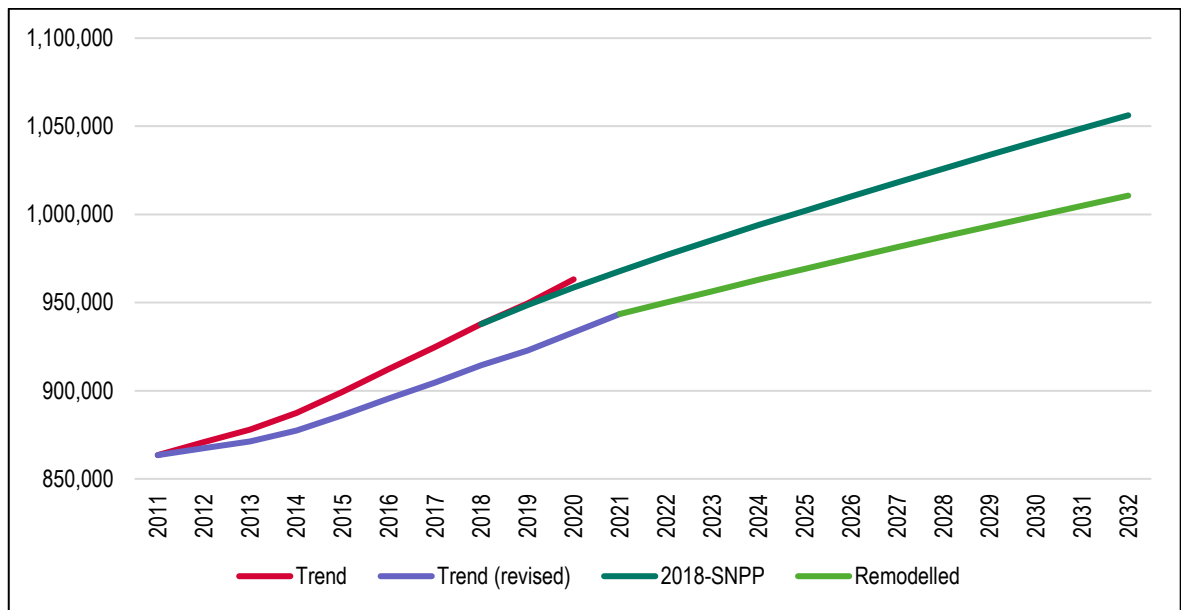
Source: ONS and demographic projections

Figure 5.2: Past trends and projected net migration – Coventry-Warwickshire



Source: ONS and demographic projections

Figure 5.3: Past trends and projected population – Coventry-Warwickshire



Source: ONS and demographic projections

5.139 The tables below show estimated population growth across the HMA split into 3 broad age bands (which can generally be described as a) children, b) working-age and c) pensionable age). This analysis shows population being projected to increase by around 60,600 people – this is a 6.4% increase over the 10-year period. The population aged 65 and over is projected to see the highest proportionate increase, but in actual number terms the population aged 16-64 is projected to see a similar level of growth. The increases in in population can be compared with the change shown by the Census (for 2011-21) of 9.2%.

Table 5.30 Projected change in population by broad age group (2022-32) – Coventry-Warwickshire

	2022	2032	Change	% change
Under 16	175,809	172,276	-3,534	-2.0%
16-64	597,484	629,204	31,720	5.3%
65+	176,736	209,181	32,446	18.4%
TOTAL	950,029	1,010,661	60,632	6.4%

Source: Demographic projections

Household Projections

5.140 The final part of the projection is to convert population estimates into households by discounting the communal population (to give a household population) and then applying household representative rates (HRR). The first analysis is however to estimate the number of households in the HMA (and authorities) as of 2021. The table below shows household estimates from the Census and also dwelling counts from DLUHC live tables.

5.141 It can be seen in all areas that the number of completions exceeds the growth in households (notably in Coventry and to a lesser extent Warwick). It is unclear why the Census figures are so low and arguably they look slightly unrealistic in some cases. Modelling has therefore been undertaken to provide estimated households in 2021 based on looking at the relationship between households and dwellings in 2011 and applying a similar relationship to 2021 dwellings. In do this, a base number of households in 2021 is as shown below:

- Coventry – 140,117
- North Warwickshire – 27,602
- Nuneaton & Bedworth – 56,943
- Rugby – 47,565
- Stratford-on-Avon – 60,426
- Warwick – 65,012

Table 5.31 Change in the number of households and dwellings (2011-21) – Coventry-Warwickshire

		2011	2021	Change
Coventry	Households	128,592	134,100	5,508
	Dwellings	132,891	144,939	12,048
North Warwickshire	Households	25,812	27,600	1,788
	Dwellings	27,033	28,858	1,825
Nuneaton & Bedworth	Households	52,711	56,600	3,889
	Dwellings	54,167	58,417	4,250
Rugby	Households	41,875	47,000	5,125
	Dwellings	43,192	48,816	5,624
Stratford-on-Avon	Households	51,928	59,500	7,572
	Dwellings	54,781	63,548	8,767
Warwick	Households	58,679	62,600	3,921
	Dwellings	60,427	66,909	6,482
Coventry-Warwickshire	Households	359,597	387,400	27,803
	Dwellings	372,491	411,487	38,996

Source: ONS (Census) and DLUHC (Table 125)

- 5.142 In projecting forward, data about household representative rates (HRRs) has been drawn from the 2014-based subnational household projections (SNHP). HRRs can be described in their most simple terms as the number of people who are counted as heads of households (or in this case the more widely used Household Reference Person (HRP)). The 2014-based figures are used as these underpin the Standard Method and generally have attracted less criticism in terms of building in a suppression of household formation than more recent projections.
- 5.143 Recent SNHP (since the 2014-based release) have come under some criticism. This is largely as they are based on data in the 2001-11 Census period and project forwards trends in household formation in this period – one in which housing affordability deteriorated significant. In both Coventry and Warwickshire, this suppression is particularly evident for the 25-34 age group where there was a notable drop in formation rates from 2001 to 2011, and ONS are projecting some continuation of this moving forward to 2021, after which the (lower) rate is held broadly stable.
- 5.144 Data about the communal population has also been drawn from the 2014-SNHP. For all areas, the 2014-HRRs 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.
- 5.145 The analysis projects an increase of around 3,500 households per annum over the 2022-32 period, with figures ranging from 94 in North Warwickshire, up to 1,296 in Coventry.

Table 5.32 Projected change in households – remodelled projection

	Households 2022	Households 2032	Change in households	Per annum
Coventry	141,244	154,202	12,958	1,296
North Warwickshire	27,709	28,653	944	94
Nuneaton & Bedworth	57,302	60,618	3,316	332
Rugby	48,232	54,269	6,037	604
Stratford-on-Avon	61,131	67,271	6,140	614
Warwick	65,503	71,215	5,712	571
Coventry-Warwickshire	401,120	436,228	35,108	3,511

Source: Demographic projections

Standard Method

- 5.146 The analysis below calculates housing need using the Standard Method, but replacing the 2014-based SNHP with the alternative projections shown above.
- 5.147 With the remodelled projection, the need is slightly lower than the analysis using 2014-based projections, with a need shown for around 4,900 dwellings per annum). In this case a lower need is again shown in Coventry, but also North Warwickshire and Nuneaton & Bedworth.

Table 5.33 Standard Method Housing Need Calculations using revised demographic projections

	Coventry	North Warwks	Nuneaton & Bedworth	Rugby	Stratford- on-Avon	Warwick	C & W
Households 2022	141,244	27,709	57,302	48,232	61,131	65,503	401,120
Households 2032	154,202	28,653	60,618	54,269	67,271	71,215	436,228
Change in households	12,958	944	3,316	6,037	6,140	5,712	35,108
Per annum change	1,296	94	332	604	614	571	3,511
Affordability ratio (2021)	5.96	8.23	7.73	7.47	10.62	10.73	
Uplift to household growth	12%	26%	23%	22%	41%	42%	
Initial need (per annum)	1,455	119	409	735	868	811	4,397
Capped	1,455	119	409	735	868	811	4,397
Urban uplift	35%	0%	0%	0%	0%	0%	
Total need (per annum)	1,964	119	409	735	868	811	4,906

Source: Derived from a range of ONS and MHCLG sources

Use of Trend-based Projection in this Report

- 5.148 Some analysis later in this report looks at the implications of demographic change (e.g. when projecting changes to the number of people with disabilities) and this draws on the remodelled trend-based projection. Where the analysis is related to population data is taken directly from the projection,

but for households a further adjustment has been made to deal with any suppression of household formation within the projections.

- 5.149 To do this a 'part-return-to-trend' analysis has been developed, where the rate of household formation sits somewhere between figures in the 2014-based projections and those in an older 2008-based version. This approach has been widely used in analysis of this nature and was an approach previously suggested by the Local Plans Expert Group (LPEG).
- 5.150 The table below shows estimated households growth using a part-return to trend (PRT) approach. Across the whole of the HMA, this shows growth of around 3,800 households per annum compared with 3,500 in the base projection.
- 5.151 It will also be noted that the estimated number of households in 2022 differs very slightly (401,120 vs. 401,332) – this is due to the inclusion of the part-return-to-trend HRRs, with improvements to household formation of younger households being modelled to start in 2021 and therefore having a small impact on data for 2022.

Table 5.34 Projected change in households with part-return-to-trend HRRs – remodelled projection

	Households 2022	Households 2032	Change in households	Per annum
Coventry	141,302	154,984	13,683	1,368
North Warwickshire	27,730	28,962	1,232	123
Nuneaton & Bedworth	57,334	61,026	3,693	369
Rugby	48,273	54,889	6,616	662
Stratford-on-Avon	61,153	67,667	6,514	651
Warwick	65,541	71,794	6,253	625
Warwickshire	260,031	284,338	24,307	2,431
Coventry-Warwickshire	401,332	439,322	37,990	3,799

Source: Demographic projections

Summary

- 5.152 The NPPF mandates the use of the 2014 subnational household projections (SNHP) in the Standard Method and following the relevant Planning Practice Guidance (PPG) the method shows a need for 5,554 dwellings per annum across the Housing Market Area (HMA).
- 5.153 The PPG does however allow for authorities to diverge from the Standard Method where this can be justified by exceptional circumstances; any alternative approach should reflect current and future demographic trends (which includes migration) and market signals.

-
- 5.154 For Coventry and Warwickshire there is a clear case to support exceptional circumstances (particularly in Coventry). It is clear that population growth in the City has been systematically over-estimated by ONS (dating back to at least 2001) and that the over-estimation works through into population projections that are demonstrably too high and unrealistic. The population projections will then work through into household projections and ultimately to estimates of need in the Standard Method.
- 5.155 A recognition of problems with population data for Coventry is not unique to this report. In 2020 the UK Statistics Authority recognised concerns regarding historical population estimates and projections for Coventry, and that in turn this can impact on household projections and estimates of housing need. It recommended that ONS should be more open to considering local data and feedback on its data; and ONS has since recognised this and that in turn this can impact on household projections and estimates of housing need.
- 5.156 Prior to publication of 2021 Census data, Icenic carried out a detailed review of a range of data sources which can provide an indication of population levels and growth. This very clearly confirmed a significant over-estimate of population in Coventry within ONS mid-year population estimates (MYE). Subsequently published Census data confirmed this where it is estimated that ONS had previously estimated the population of the City to be around 40,000 people higher than the Census now shows.
- 5.157 Across Warwickshire, a similar analysis suggests ONS had previously under-estimated population growth, however, the scale of the difference (around 10,700 people over the 2011-21 decade) is substantially lower than the over-estimation for Coventry.
- 5.158 It is clear from the analysis that there are exceptional circumstances which will allow a departure from the Standard Method housing need. In short, the data feeding into population (and hence household) projections is substantially wrong and will provide trend-based projections that are wholly unrealistic. As noted, issues with data for Coventry go back at least to 2001 and will therefore be impacting on all ONS projections, including those used for the 2014-based SNHP.
- 5.159 Where demonstrating exceptional circumstances, it is necessary to take forward a method that takes account of demographic trends and this report has drawn on data from the 2021 Census and information about births and deaths to develop an up-to-date trend based projection. This projection has then been used within the framework of the Standard Method (i.e. to include a relevant affordability adjustment) and shows a need across the HMA for 4,906 dwellings per annum; lower than the standard Method as published, and lower mainly due to the issues in published projections for Coventry.

5.160 Given across the HMA that population figures have been over-estimated for many years, it is reasonable and expected that any alternative trend-based projection would show a lower need. It is however recommended that the Councils monitor new data releases from ONS (including MYE and projections) as ONS will need to grapple with the issue of inaccuracies in the MYE in any future releases.

6. ECONOMIC GROWTH POTENTIAL

6.1 This section presents economic forecasts developed by Cambridge Econometrics (CE) for the Coventry and Warwickshire economy. We then move on to consider the future growth potential of different local economies having regard to the baseline forecasts. In doing so we have focused on potential demand-side drivers (rather than land supply).

CE's Baseline Projections – Overview

6.2 The local area baseline projections are developed based on CE's March 2021 UK and regional forecast. The projections include historical local area employment data to 2019, regional and national employment data to 2020, and GVA data to 2018.

UK Forecast

6.3 CE's UK forecast is developed using CE's Multi-Sectoral Dynamic Model (MDM). The model determines final expenditure, output and employment by disaggregating sectors, commodities, and household and government expenditures, as well as foreign trade and investment, within an input-output framework to identify the inter-relationships between sectors. The forecasts are based on the latest available national and regional historical data and macroeconomic assumptions (e.g. components of output). The key COVID-19 and EU exit assumptions are summarised below.

Covid-19

6.4 It is assumed that lockdown and social distancing measures will follow the Government's envisaged 'road map', with lockdown formally ending in late-March 2021, social distancing to progressively ease over spring and the domestic economy to open fully by mid/late summer (with all UK adults expected to be offered a dose of the COVID vaccine by this time). The assumed 'post-lockdown' pick-up in activity will mean that GDP is assumed to increase in 2021, though to a lesser extent than previously forecast due to the weak start to the year.

6.5 Despite the opening up of the UK economy in 2021 Q2, persistent economic scarring and a muted economic recovery in 2021/2022 is expected. This comes as a result of rising unemployment, business closures, weak capital accumulation and permanent productivity impacts of the pandemic.

6.6 Moreover, UK trade prospects remain very weak due to slow global economic growth (exacerbated/perpetuated by inequalities in the global allocation of the vaccine) and Brexit trade disruptions (see EU exit section below). Given this, the central assumption of the forecast is a 3.6% increase in GDP in 2021 and a 2.8% increase in GDP in 2022.

EU Exit

6.7 Based on the general terms included in the EU–UK Trade and Cooperation Agreement that was signed on 30th December 2020, the following political assumptions were adopted:

- The agreed Free Trade Agreement with the EU avoids reversal to WTO terms, but results in some barriers to trade which will gradually phase in.
- The points-based migration system introduces restrictions on inward migration from the EU.
- The uncertainty about the possibility of no-deal Brexit is lifted. However, some uncertainty remains over the speed of regulatory divergence.
- Some uncertainty remains over the possibility of changes to the agreement in the future that could affect the barriers to trade, such as the equivalence rules in the financial sector.
- The UK will continue to seek other trade agreements, which could reduce barriers to trade with non-EU countries in the future.

Local area Baseline Projections

6.8 The local area baseline projections are based on historical growth in the local area (i.e. the relevant local authority) relative to the region (West Midlands) or UK (depending on which area it has the strongest relationship with), on a sector-by-sector basis. They assume that those relationships continue into the future. Thus, if a sector in the local area outperformed the sector in the region (or UK) as a whole in the past, then it will be assumed to do so in the future. Similarly, if it underperformed the region (or UK) in the past then it will be assumed to underperform the region (or UK) in the future.

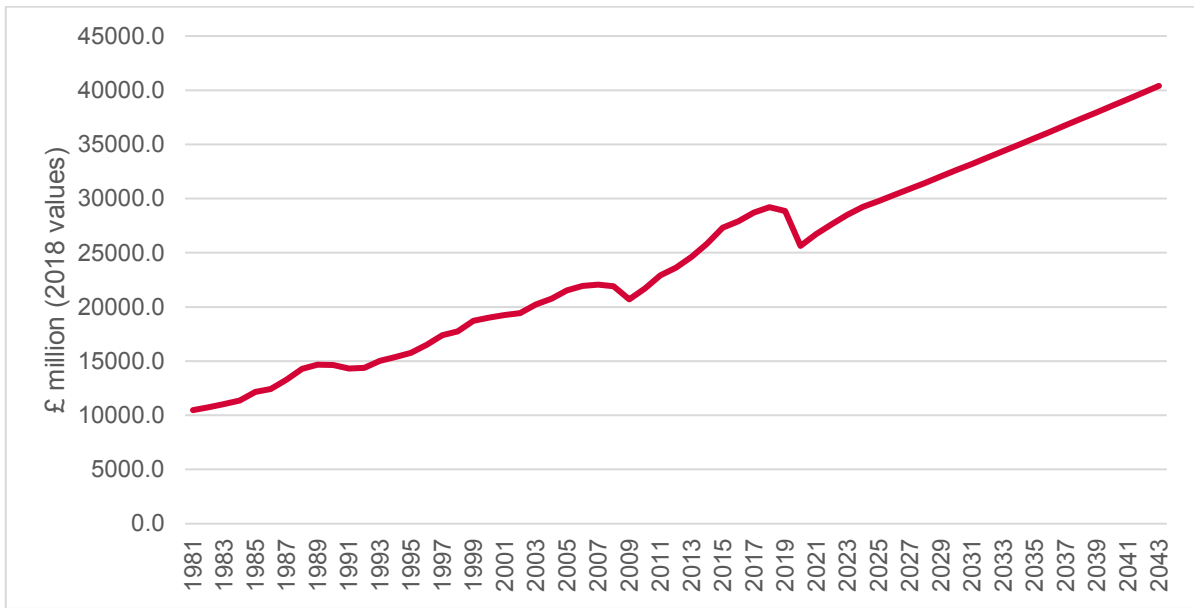
6.9 They further assume that economic growth in the local area is not constrained by supply-side factors, such as population and the supply of labour. They assume that there will be enough labour (either locally or through commuting) with the right skills to fill the jobs. If, for example, in reality, the labour supply is not there to meet projected growth in employment, growth could be slower.

6.10 The measure of employment is workplace-based jobs, which include full-time, part-time and self-employed.

Sectoral Outlook

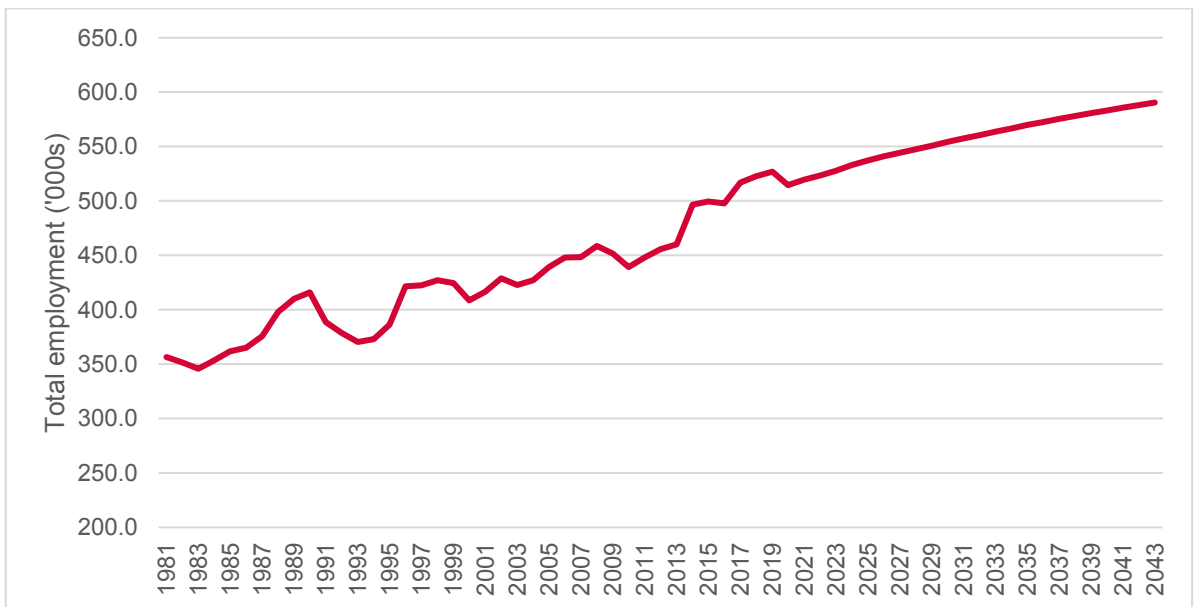
6.11 The Cambridge Econometrics forecasts expect GVA across Coventry and Warwickshire to grow by an average of 1.4% pa over the 2019-43 period. If the effect of the 2020 correction is set aside, the rate of growth would be equivalent to 2.0% pa (2020-43). This is slightly below longer-term trends.

Figure 6.1: Projected GVA – Coventry & Warwickshire



6.12 Total employment has been growing historically at a rate of 1.0% pa over the period since 1981. Employment growth looking forwards is projected to grow at 0.5% pa (2019-43) with total employment growth of 11.5 million over the period to 2043. More modest growth than historically is consistent with CE's national/ regional outlooks.

Figure 6.2: Projected Employment – Coventry & Warwickshire



6.13 The table below analyses how GVA is expected to change over the 2019-43 period. Manufacturing accounts for 20% of GVA in 2019 and is expected to retain this share, with the projections expecting growth of 1.4% pa. The picture for wholesale and warehousing is similar. The relative share of GVA

in ICT and Media; and Public Admin, Health and Education is expected to grow; whilst the share in Agriculture/Mining and Real Estate and Professional Services is expected to contract.

Table 6.1 Baseline Projections for GVA – Coventry and Warwickshire, 2019-43

	2019 GVA ('mill)	% GVA, 2019	2001-19 CAGR	2019-43 CAGR	% GVA, 2043
Agriculture, Mining & Utilities	2516.2	9.5%	5.9%	0.3%	7.4%
Manufacturing	5243.7	19.8%	2.1%	1.4%	20.1%
Construction	1622.8	6.1%	1.1%	1.1%	5.8%
Wholesale, Transport & Warehousing	3087.0	11.6%	2.0%	1.4%	11.8%
Retail, incl Motor Vehicle Trade	1977.8	7.5%	2.2%	1.3%	7.4%
Accommodation, Food & Beverage	650.4	2.5%	0.5%	2.0%	2.9%
ICT and Media	1376.9	5.2%	3.5%	2.4%	6.7%
Real Estate & Prof Services	4776.8	18.0%	2.4%	1.0%	16.6%
Public Admin, Education & Health	3890.2	14.7%	1.4%	1.8%	16.5%
Other Services	1389.5	5.2%	0.7%	1.1%	4.9%

Source: Icen analysis of CE Projections

6.14 The outlook in respect of employment is set out below.

Table 6.2 Baseline Projections for Employment – Coventry and Warwickshire, 2019-43

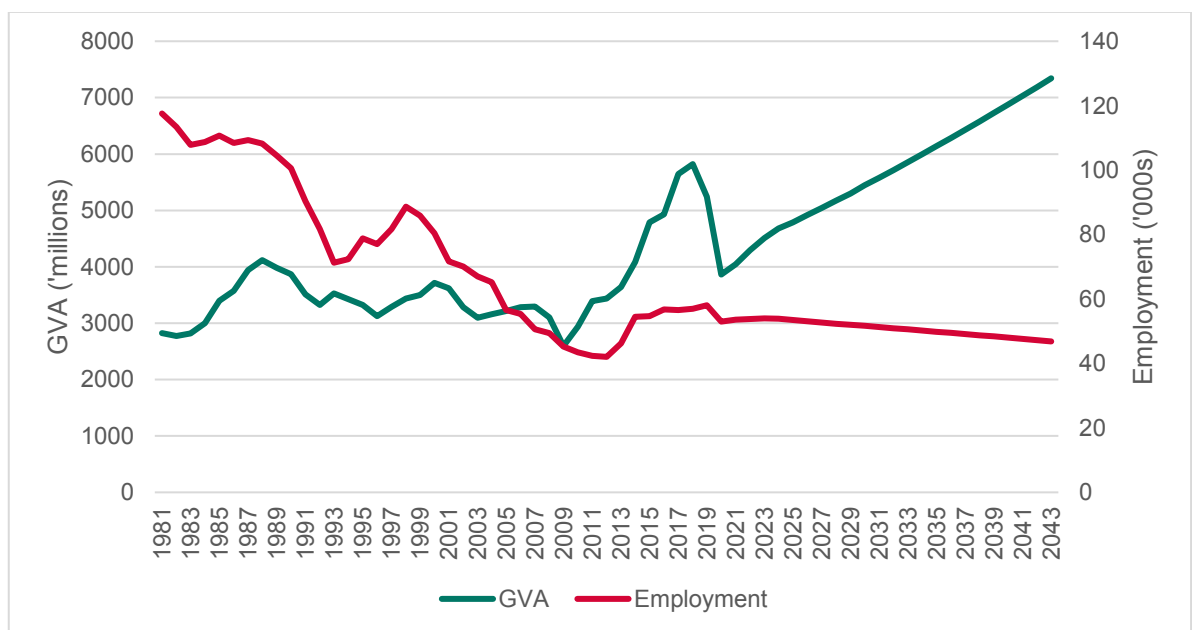
	2019 Employ- ment ('000s)	% Employ- ment, 2019	2001-19	2011-19	2019-43	% Change, 2019-43
Agriculture, Mining & Utilities	16.3	3.1%	7.5	5.3	-2.0	-12%
Manufacturing	58.0	11.0%	-13.6	15.7	-11.2	-19%
Construction	31.7	6.0%	5.5	5.0	0.1	0%
Wholesale, Transport & Wh	61.7	11.7%	20.4	15.7	8.8	14%
Retail, incl MV Trade	54.9	10.4%	5.9	6.0	1.9	3%
Accommodation, Food & Beverage	32.6	6.2%	4.5	4.0	18.4	57%
ICT and Media	16.0	3.0%	3.7	0.0	11.5	72%
Real Estate & Prof Services	108.2	20.5%	38.6	20.3	14.5	13%
Public Admin, Education & Health	94.6	18.0%	22.0	2.4	17.0	18%
Other Services	52.7	10.0%	15.9	4.3	4.4	8%
Total	526.9	100%	110.4	78.7	63.5	12%

Source: Icen analysis of CE Projections

6.15 For agriculture, mining and utilities, modest growth in GVA is expected; but driven by productivity improvements, employment is expected to fall by around 12% over the period to 2043. Within this, agricultural employment is projected to remain relative stable.

6.16 In the manufacturing sector, GVA is projected to grow by an average of 1.4% pa. Whilst the recent trend in employment in the sector has been upwards, improvements in productivity and increasing mechanisation mean overall employment is expected to fall. Continuing growth in the sector is however likely to mean a need for additional land. As the chart below shows, the long-term trend has been of falling manufacturing employment. Employment has stabilised in recent years (with overall employment growing slightly 2012-19) but improvements in productivity are projected to lead to a modest reduction in job numbers moving forwards. Growth in GVA has been strong over the period since 2009, and whilst some projection is expected, the longer-term outlook for manufacturing GVA growth is strong.

Figure 6.3: Trend and Projections for Manufacturing GVA and Employment – C&W



6.17 If we look at individual manufacturing sectors, sectors which contribute strongly to sub-regional GVA are: motor vehicles (a particular strength); other transport equipment; machinery; and metals/ metal products. Manufacturing GVA growth is expected to be driven by the automotive sector in particular with growth focused in motor vehicles, other transport equipment and machinery. However there are some other sectors where notable growth is envisaged including electronics and electrical equipment.

- 6.18 The projections expect employment/GVA contraction initially linked to the shock effects of Brexit and Covid. Modest employment growth is anticipated in electronics; but generally some contraction in jobs is expected linked to improving productivity. Nonetheless, the outlook for manufacturing within the CE projections is overall relative positive.

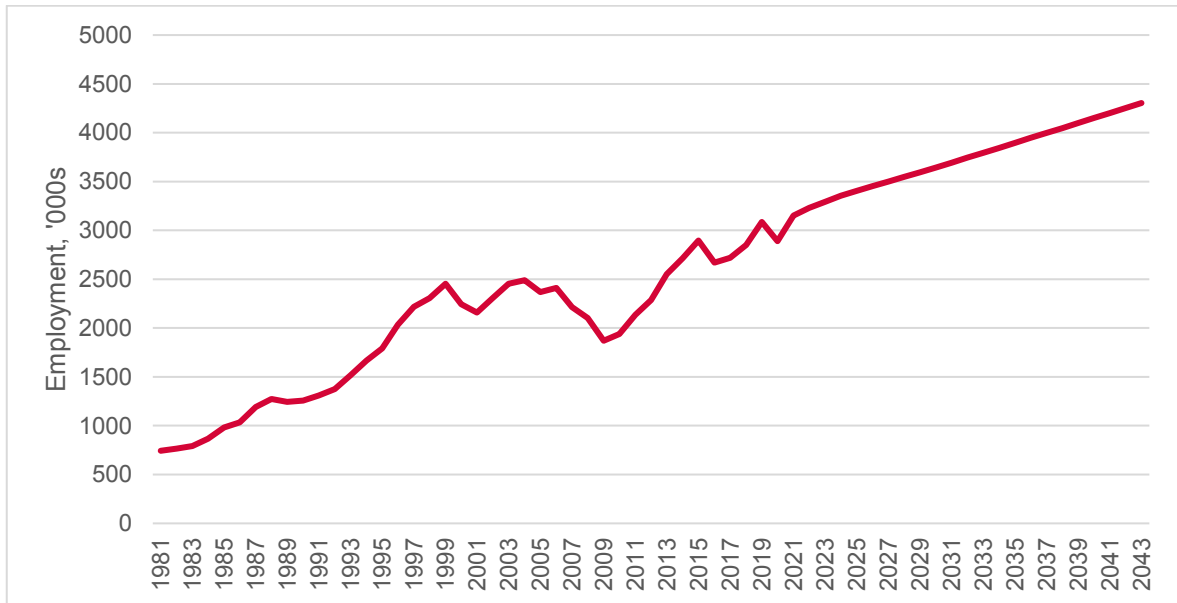
Table 6.3 Projected Employment and GVA Growth by Manufacturing Sub-Sector, Coventry & Warwickshire

	GVA, 2020 (£m)	GVA Growth, 2020-43 (% CAGR)	Employe nt, 2020 est (‘000s)	Employe nt Change, 2020-43 (‘000s)
Food, drink & tobacco	168.4	0.7%	3.9	-0.1
Textiles etc	43.4	0.2%	1.0	-0.4
Wood & paper	34.6	0.9%	0.9	0.1
Printing & recording	28.0	-0.7%	0.7	-0.3
Coke & petroleum	0.9	-0.5%	0.0	0.0
Chemicals	37.3	-0.1%	0.5	-0.3
Pharmaceuticals	30.5	0.5%	0.5	-0.2
Non-metallic mineral products	185.9	1.7%	5.4	-0.2
Metals & metal products	219.1	0.9%	7.5	-1.7
Electronics	97.9	3.4%	1.0	0.2
Electrical equipment	105.9	2.2%	1.3	0.0
Machinery	377.3	2.1%	5.5	-1.1
Motor vehicles	1952.8	3.4%	18.7	-1.6
Other transport equipment	409.2	3.8%	1.7	-0.1
Other manufacturing & repair	170.4	1.5%	4.4	-0.4

Source: Icen analysis of CE Projections

- 6.19 Employment in construction is expected to remain relatively static, albeit with GVA growing by 1.1%. This is influenced by productivity improvements.
- 6.20 GVA in wholesale, transport and warehousing is expected to grow by 1.4% pa, which is similar to the growth forecast for manufacturing and represents a relatively positive outlook for the sector. Employment growth of 8,800 (+14%) is expected across the sub-region over the 2019-43 period. As the chart below shows, employment growth is expected to be relatively consistent to the long-term trend. The projections will also build in some productivity improvements associated with increased automation.

Figure 6.4: Employment in Wholesale, Transport and Warehousing – Coventry & Warwickshire



Source: Icen analysis of Cambridge Econometrics Projections

6.21 A substantial proportion of overall employment growth is however focused on service-related sectors. The chart below analyses performance in these activities. Overall key growth sectors include:

- Food and beverage services, with expected growth in employment of 18,800 across the sub-region. This looks to us potentially optimistic.
- IT Services, which has been a growing sector, and is expected to post very impressive growth with 10,900 jobs created. This will include the cluster of gaming activities.
- Some growth in other sectors which have typically been office based including head offices/management consultancy; real estate; architecture/engineering and other professional services;
- Some growth in public sector dominated sectors, particularly in education which is expected to see 10,900 additional jobs; as well as more modest growth in public admin and health;
- Growth in employment in residential and social care, no doubt driven in particular by changing demographics.

Table 6.4 Employment Trends and Projections – Service Sector – Coventry & Warwickshire

Employment, '000s	2001-19	2019-20	2020-43	2019-43	% Change, 2019-43
Accommodation	-0.2	0.2	-0.5	-0.3	-4%
Food & beverage services	4.7	1.0	17.8	18.8	74%
Media	0.8	0.5	0.0	0.6	26%
IT services	2.9	2.1	8.8	10.9	79%
Financial & insurance	-1.6	0.1	-0.6	-0.5	-4%
Real estate	3.7	0.1	1.5	1.6	23%
Legal & accounting	3.1	-0.3	0.7	0.4	6%
Head offices & management consultancies	12.5	0.6	3.8	4.4	26%
Architectural & engineering services	4.3	1.0	1.4	2.4	21%
Other professional services	2.1	-0.7	2.2	1.5	14%
Business support services	14.4	-3.9	8.7	4.8	11%
Public Administration & Defence	-1.0	-0.3	2.5	2.2	13%
Education	11.9	0.9	10.0	10.9	23%
Health	11.1	0.8	3.1	4.0	13%
Residential & social	9.2	-1.7	7.2	5.5	22%
Arts	3.5	-0.5	-1.2	-1.7	-27%
Recreational services	1.0	-0.1	1.6	1.5	22%
Other services	2.2	-0.7	-0.2	-0.9	-6%

Source: Icen analysis of Cambridge Econometrics Projections

Outlook for Individual Authorities

- 6.22 The outlook for individual authorities is set out below. Employment is projected to grow by 63,500 across the sub-region over the period to 2043. The strongest absolute growth is expected in Coventry, followed by Warwick. But relative to its existing employment, North Warwickshire is expected to post the strongest proportional growth. Weaker relative growth is expected in Nuneaton and Bedworth (9%).

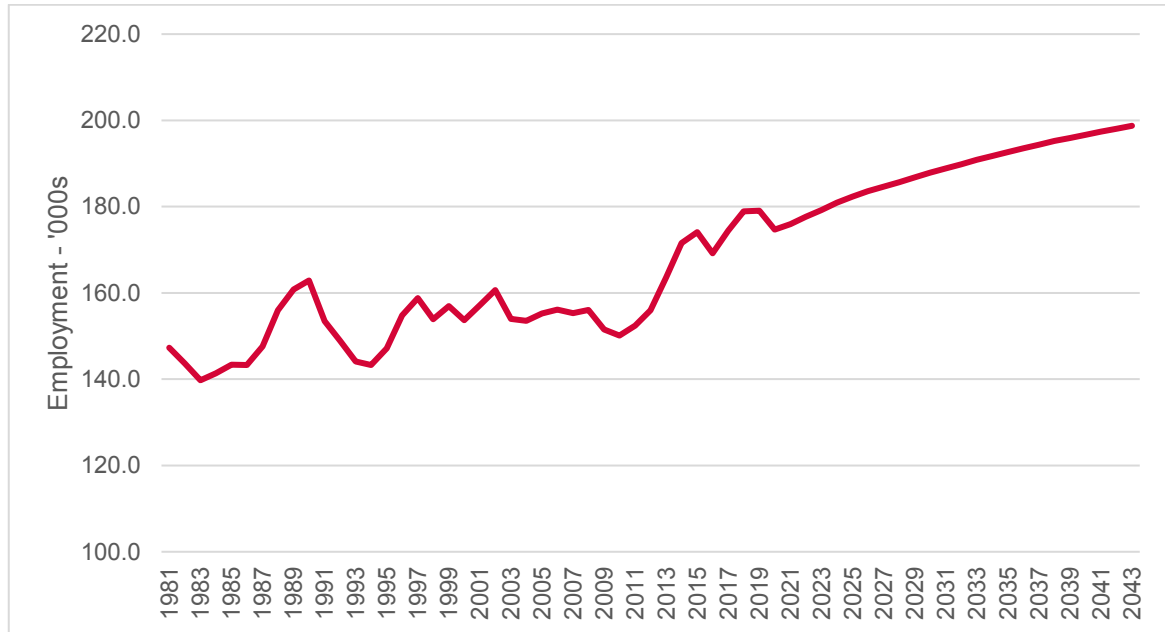
Table 6.5 Projected Growth in Employment by District

	2019	2043	Change	% Change
Coventry	179.1	198.8	19.7	11%
North Warwickshire	53.9	62.6	8.8	16%
Nuneaton & Bedworth	54.8	59.7	4.9	9%
Rugby	55.8	63.6	7.8	14%
Stratford-on-Avon	85.2	94.3	9.1	11%
Warwick	98.1	111.5	13.3	14%
C&W	526.9	590.4	24	12%

Source: Icen analysis of Cambridge Econometrics Projections

6.23 The outlook for Coventry is relatively positive. As the graph below shows, employment was relatively static through the 1990s and 2000s, but the City's economy has performed notably better since with relatively strong growth recorded since 2011. The outlook is not as strong as this, but certainly exceeds the long-term trend.

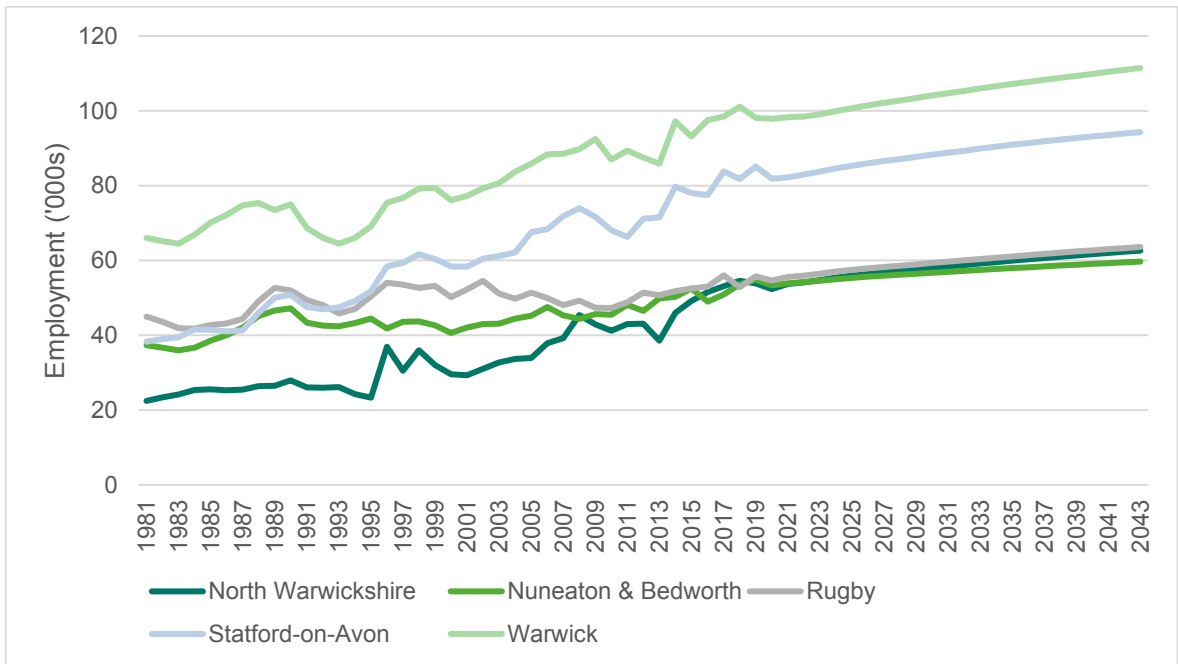
Figure 6.5: Employment Projection – Coventry



Source: Icen analysis of Cambridge Econometrics Projections

6.24 For the Warwickshire authorities, it is notable that North Warwickshire's stronger relative performance is consistent with the historic trend.

Figure 6.6: Employment Projections – Warwickshire Authorities



Source: Icen analysis of Cambridge Econometrics Projections

7. RELATIONSHIP BETWEEN HOUSING AND ECONOMIC GROWTH

7.1 The analysis in this section considers the relationship between housing and economic growth; seeking to understand what level of jobs might be supported by changes to the local labour supply (which will be influenced by population change). To look at estimates of the job growth to be supported, a series of stages are undertaken. These can be summarised as:

- Estimate changes to the economically active population (this provides an estimate of the change in labour-supply);
- Overlay information about commuting patterns, double jobbing (i.e. the fact that some people have more than one job) and potential changes to unemployment; and
- Bringing together this information will provide an estimate of the potential job growth supported by the population projections

7.2 The analysis then moves on to look at the labour-supply growth likely to be required to meet job growth forecasts and then convert this into an estimate of household growth and hence housing need.

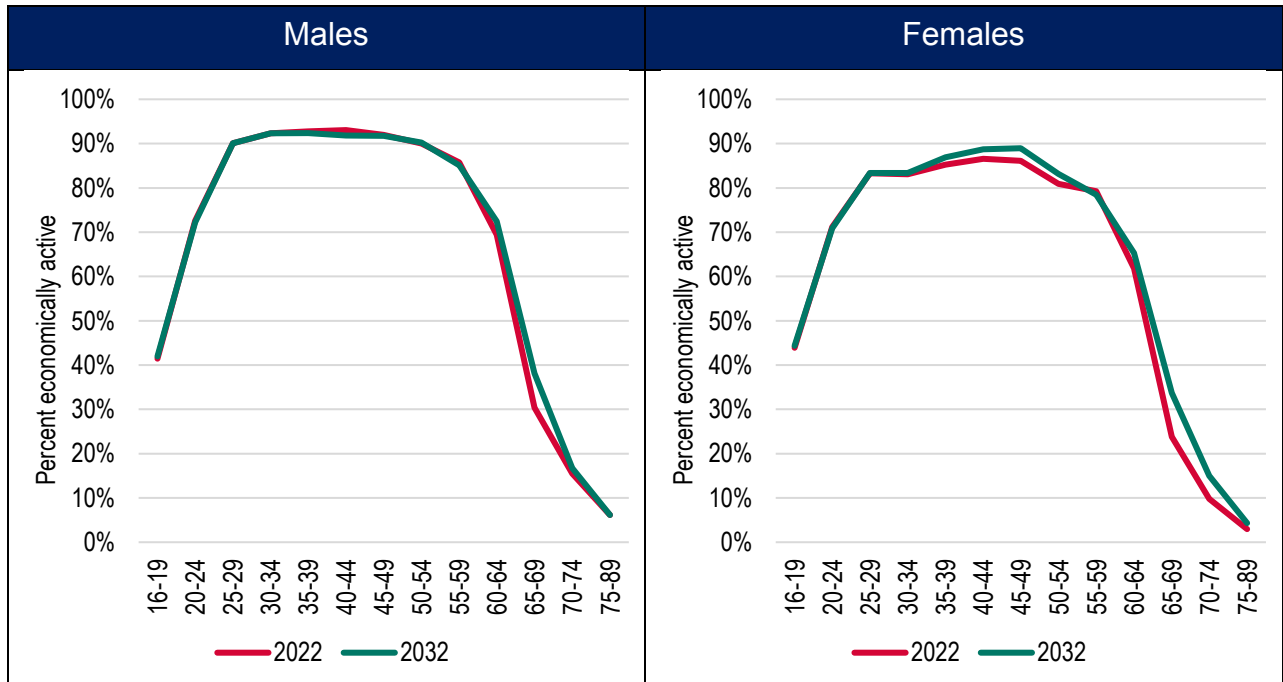
7.3 The analysis mainly looks at economic growth and housing in the 2022-32 period to be consistent with analysis around demographics and housing need although it is recognised that plans will extend beyond this date (and so the direction of economic forecasts post 2032 have also been referenced in this section).

Growth in Resident Labour Supply

7.4 The approach taken in this report is to derive a series of age and sex specific economic activity rates and use these to estimate how many people in the population will be economically active as projections develop. This is a fairly typical approach with data being drawn in this instance from the Office for Budget Responsibility (OBR) – July 2018 (Fiscal Sustainability Report).

7.5 The figure and table below show the assumptions made (for Coventry & Warwickshire). The analysis shows that the main changes to economic activity rates are projected to be in the 60-69 age groups – this will to a considerable degree link to changes to pensionable age, as well as general trends in the number of older people working for longer (which in itself is linked to general reductions in pension provision). Whilst data is presented for the whole of the HMA, all analysis has been developed on an individual local authority area basis.

Figure 7.1 Projected changes to economic activity rates (2022 and 2032) – Coventry & Warwickshire



Source: Based on OBR and Census (2011) data

Table 7.1 Projected changes to economic activity rates (2022 and 2032) – Coventry & Warwickshire

	Males			Females		
	2022	2032	Change	2022	2032	Change
16-19	41.5%	42.0%	0.5%	43.9%	44.3%	0.4%
20-24	72.6%	72.2%	-0.4%	71.2%	70.9%	-0.3%
25-29	90.1%	90.1%	0.0%	83.3%	83.4%	0.0%
30-34	92.3%	92.3%	0.0%	83.1%	83.4%	0.3%
35-39	92.8%	92.4%	-0.4%	85.2%	86.9%	1.6%
40-44	93.1%	91.8%	-1.2%	86.6%	88.7%	2.2%
45-49	92.0%	91.7%	-0.3%	86.1%	89.0%	2.9%
50-54	90.0%	90.2%	0.2%	80.9%	83.1%	2.2%
55-59	85.7%	85.1%	-0.6%	79.2%	78.4%	-0.8%
60-64	69.4%	72.4%	3.0%	61.8%	65.3%	3.5%
65-69	30.4%	38.1%	7.7%	23.8%	33.7%	9.9%
70-74	15.5%	16.7%	1.2%	9.8%	15.0%	5.2%
75-89	6.1%	6.1%	0.0%	3.0%	4.3%	1.4%

Source: Based on OBR and Census (2011) data

7.6 Working through an analysis of age and sex specific economic activity rates it is possible to estimate the overall change in the number of economically active people in the Council area – this is set out in the tables below. The analysis shows that the main demographic projection (based on 10 year

demographic trends) results in growth in the economically-active population of 37,700 people – an 8% increase.

Table 7.2 Estimated change to the economically active population (2022-32) – Coventry & Warwickshire (10-year demographic trends)

	Economically active (2022)	Economically active (2032)	Total change in economically active	% change
Coventry	176,759	195,195	18,436	10.4%
North Warwickshire	34,848	34,981	134	0.4%
Nuneaton & Bedworth	70,986	74,005	3,019	4.3%
Rugby	64,196	70,300	6,104	9.5%
Stratford-on-Avon	72,350	76,494	4,144	5.7%
Warwick	80,644	86,555	5,911	7.3%
Warwickshire	323,023	342,335	19,312	6.0%
Coventry & Warwickshire	499,782	537,530	37,748	7.6%

Source: Derived from demographic projections

Linking Changes to Resident Labour Supply and Job Growth

7.7 The analysis above has set out potential scenarios for the change in the number of people who are economically active. However, it is arguably more useful to convert this information into an estimate of the number of jobs this would support. The number of jobs and resident workers required to support these jobs will differ depending on three main factors:

- Commuting patterns – where an area sees more people out-commute for work than in-commute it may be the case that a higher level of increase in the economically active population would be required to provide a sufficient workforce for a given number of jobs (and vice versa where there is net in-commuting);
- Double jobbing – some people hold down more than one job and therefore the number of workers required will be slightly lower than the number of jobs; and
- Unemployment – if unemployment were to fall then the growth in the economically active population would not need to be as large as the growth in jobs (and vice versa).

Commuting Patterns

7.8 The table below shows summary data about commuting to and from Coventry-Warwickshire from the 2011 Census. Overall, the data shows that the HMA sees a level of net in-commuting for work with the number of people resident in the area who are working being about 3% lower than the total number who work in the area. This number is shown as the commuting ratio in the final row of the

table and is calculated as the number of people living in an area (and working) divided by the number of people working in the area (regardless of where they live). Figures for individual authorities show net in-commuting to most areas, the exceptions being Nuneaton & Bedworth and Rugby.

Table 7.3 Commuting patterns in Coventry & Warwickshire

	Coventry	North Warwickshire	Nuneaton and Bedworth	Rugby	Stratford-on-Avon	Warwick	C-W
Live and work in Local Authority (LA)	78,767	8,567	22,121	21,443	23,266	31,809	-
Home workers	10,157	3,451	4,443	5,297	10,476	8,380	-
No fixed workplace	9,367	2,446	3,897	3,410	4,835	4,287	-
In-commute	50,630	25,304	15,048	17,551	25,435	33,760	-
Out-commute	39,851	16,954	29,955	20,566	22,800	25,593	-
Total working in LA	148,921	39,768	45,509	47,701	64,012	78,236	424,147
Total living in LA (and working)	138,142	31,418	60,416	50,716	61,377	70,069	412,138
Commuting ratio	0.928	0.790	1.328	1.063	0.959	0.896	0.972

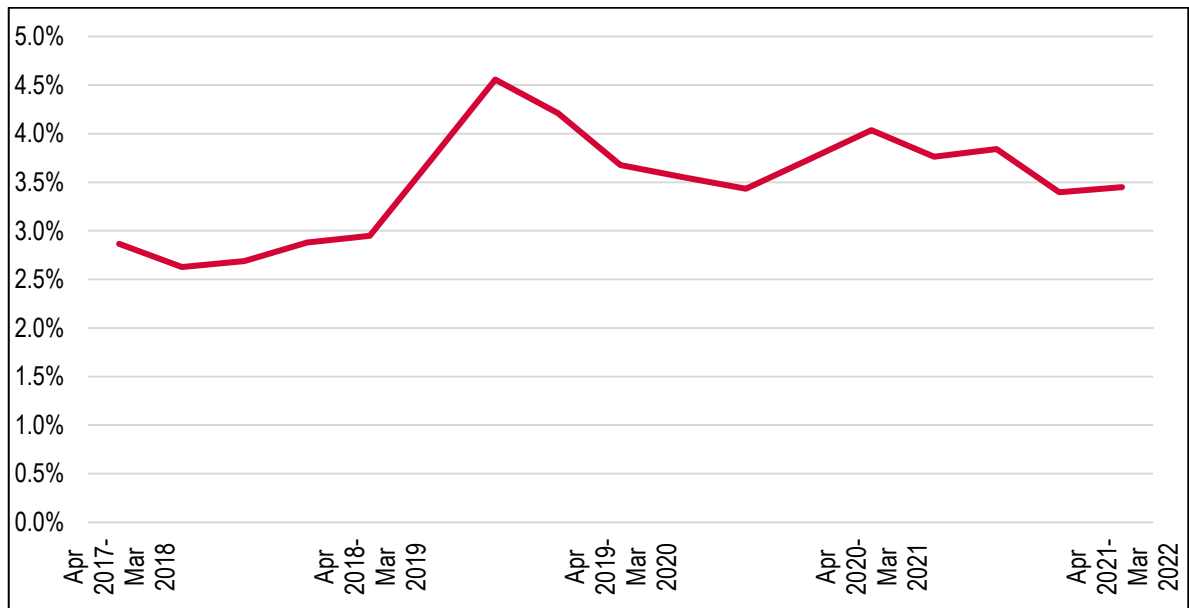
Source: 2011 Census

7.9 In translating the commuting pattern data into growth in the labour-force, a core assumption is that the commuting ratio remains at the same level as shown by the 2011 Census. A sensitivity has also been developed where commuting for new jobs is assumed to be on a 1:1 ratio (i.e. the increase in the number of people working in the Council area is equal to the number of people living in the Council area who are working). This sensitivity is useful to understand the implications for housing as to continue to assume net in-commuting would arguably mean that Coventry & Warwickshire would be providing jobs for people in housing in other local authorities. The 1:1 ratio is also useful in the context of Covid-19 with the likelihood being that a greater proportion of people will work from home (or mainly from home) in the future.

Double Jobbing

7.10 The analysis also considers that a number of people may have more than one job (double jobbing). This can be calculated as the number of people working in the local authority divided by the number of jobs. Data from the Annual Population Survey (available on the NOMIS website) for the past five years suggests across the HMA that typically about 3.5% of workers have a second job.

Figure 7.2 Percentage of all people in employment who have a second job (2017-2022) – Coventry & Warwickshire



Source: Annual Population Survey (from NOMIS)

7.11 For the purposes of this assessment it has been assumed that around 3.5% of people will have more than one job moving forward. A double jobbing figure 3.5% gives rise to a ratio of 0.965 (i.e. the number of jobs supported by the workforce will be around 3.5% higher than workforce growth). It has been assumed in the analysis that the level of double jobbing will remain constant over time, although the apparent upward trend should be noted.

7.12 For the analysis, estimates have also been made for individual local authorities, with double jobbing percentages for each area being shown below:

- Coventry – 3.3%
- North Warwickshire – 5.0%
- Nuneaton & Bedworth – 2.7%
- Rugby – 3.4%
- Stratford-on-Avon – 4.9%
- Warwick – 4.4%

Unemployment

7.13 The last analysis when looking at the link between jobs and resident labour supply is a consideration of unemployment. Essentially, this is considering if there is any latent labour force that could move back into employment to take up new jobs. This is particularly important given there is likely to have

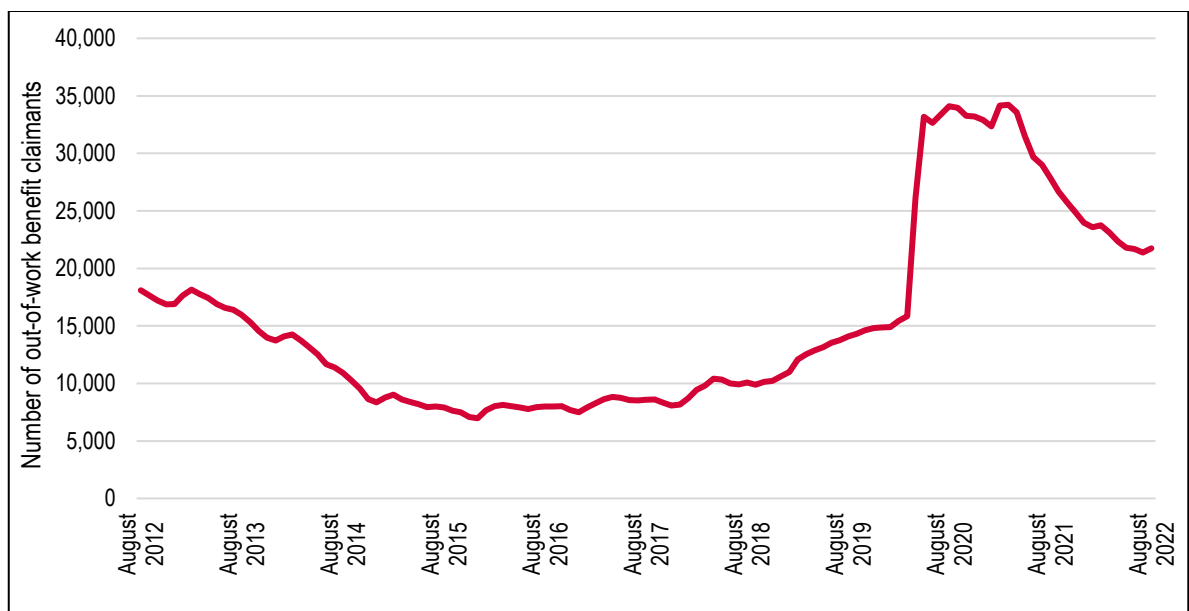
been notable increases in unemployment due to Covid-19, although it will be difficult to be precise about numbers, particularly as the impact of the ending of the furlough scheme are unknown.

7.14 The figure below looks at Claimant Count data (described as the number of people claiming Jobseeker's Allowance plus those who claim Universal Credit who are out of work). This will not give a full picture of unemployment as not all those unemployed will be a claimant, but it will certainly help to provide an indication; claimant count data is available up to August 2022 with the data below showing a trend for the previous decade.

7.15 The analysis shows a clear increase in the number of claimants (presumably as a result of the pandemic) – rising from around 15,000 to approaching 35,000, dropping in the latest period for which data is provided to just over 20,000).

7.16 This analysis would suggest as of mid-2022 (the start point of the demographic projections) that there may be some latent labour supply in the HMA (i.e. people who are not currently working but who would return to work if there was a suitable job available). It is however clear that the majority of people losing jobs through the pandemic are back working. Therefore, whilst this analysis is interesting, it is considered that no additional allowance needs to be made for people moving back into the labour-supply post-2022.

Figure 7.3 Number of out-of-work benefit claimants (2012-2022) – Coventry-Warwickshire



Source: NOMIS

Jobs Supported by Growth in the Resident Labour Force

7.17 The tables below shows how many additional jobs might be supported by population growth under the 5- and 10-year trend based projections. Given current commuting patterns and estimates about

double jobbing, it is estimated that around 40,500 additional jobs could be supported by the changes to the resident labour supply in the demographic projection; a slightly lower number of jobs could be supported if the analysis assumes a 1:1 commuting ratio (39,200) to 2032.

Table 7.4 Jobs supported by demographic projections (2022-32) – 10-year trends

		Total change in economically active	Allowance for net commuting	Allowance for double jobbing (= jobs supported)
Census commuting	Coventry	18,436	19,875	20,562
	North Warwickshire	134	169	178
	Nuneaton & Bedworth	3,019	2,274	2,337
	Rugby	6,104	5,741	5,942
	Stratford-on-Avon	4,144	4,322	4,544
	Warwick	5,911	6,600	6,907
	Warwickshire	19,312	19,106	19,910
	Coventry-Warwickshire	37,748	38,981	40,471
1:1 commuting	Coventry	18,436	18,436	19,074
	North Warwickshire	134	134	141
	Nuneaton & Bedworth	3,019	3,019	3,103
	Rugby	6,104	6,104	6,318
	Stratford-on-Avon	4,144	4,144	4,357
	Warwick	5,911	5,911	6,186
	Warwickshire	19,312	19,312	20,105
	Coventry-Warwickshire	37,748	37,748	39,179

Source: Derived from a range of sources

Economic Growth and Housing Need – Job Forecasts

7.18 To look at estimates of the numbers of homes required to support jobs growth, the method which is followed is identical to that set out for translating homes into jobs but completed in reverse to get to a population growth.

7.19 This level of population growth is then applied to the household formation rates developed earlier in this report to get to a household growth. A final adjustment to reflect a level of vacancy in the housing stock is applied to the household growth to get to dwelling growth. The stages can be summarised as:

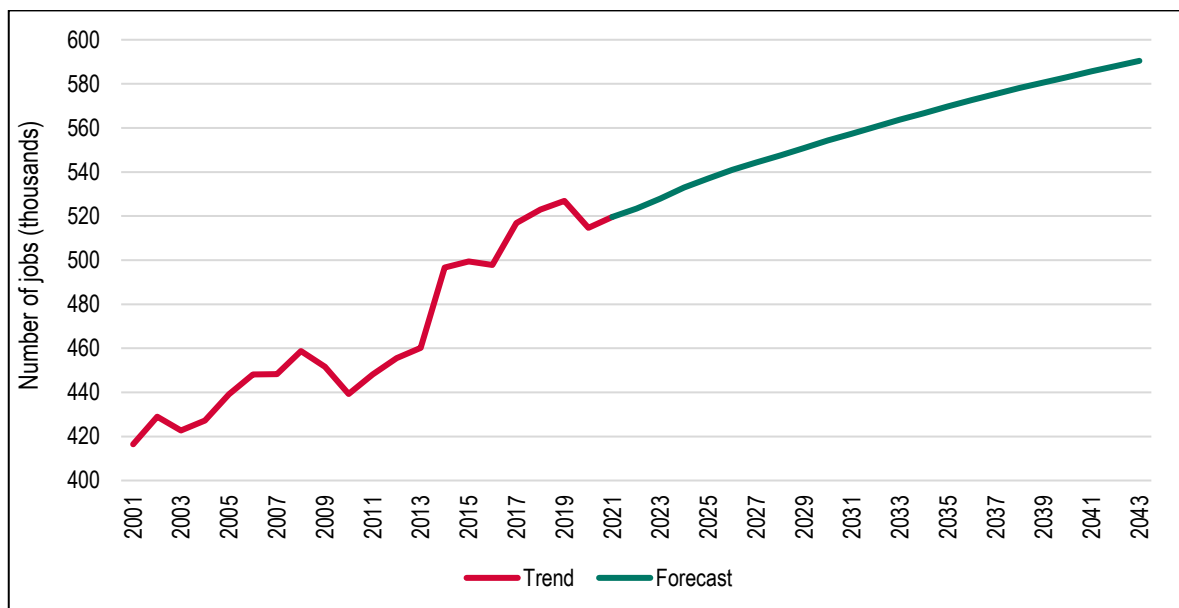
- Start with estimates of job growth;

- Estimate changes required to the economically active population to meet the jobs growth – this takes account of information about commuting patterns, double jobbing (i.e. the fact that some people have more than one job) and potential changes to unemployment;
- Flex levels of migration within the demographic model so that the change in the economically active population equals the change required to meet the number of jobs (migration can be ‘flexed’ up or down with stronger economic growth resulting in higher net in-migration as more people are required in the labour-supply); and
- Apply household representative rates to the resulting population projection and apply a vacancy allowance to calculate the number of households and dwellings needed.

7.20 The figure below shows past trends and a future forecast of job growth across the HMA – the data has been provided by Cambridge Econometrics (CE). Between 2022 and 2032 the forecast expects to see an increase of around 37,200 jobs, which is lower than any of the estimates of the number of jobs that could be supported when modelled against the demographic projections. Over the remainder of the period to 2043 (i.e. 2032-43) the forecast sees a further 29,900 jobs, annual job growth is therefore expected to slow down over time.

7.21 The forecast is also interesting for showing a drop in jobs from 2019 to 2020, consistent with the analysis of claimant count data previously set out. The forecast then shows a recovery in jobs from 2020, which is again consistent with other data.

Figure 7.5 Past trends and forecast future number of jobs in Coventry & Warwickshire



Source: Cambridge Econometrics

- 7.22 The table below shows jobs growth forecasts for each local authority area – two time periods are used (2022-32, and 2032-43). For all areas jobs growth is forecast to be stronger in the 10-year period to 2032 than the 11-year period to 2043.

Table 7.5 Forecast future jobs in Coventry & Warwickshire – by Local Authority

	Job growth (2022-32)	Job growth (2032-43)	Total (2022-43)
Coventry	12,192	8,924	21,116
North Warwickshire	4,638	3,844	8,482
Nuneaton & Bedworth	2,979	2,487	5,466
Rugby	4,117	3,567	7,684
Stratford-on-Avon	6,387	4,948	11,335
Warwick	6,910	6,107	13,017
Warwickshire	25,031	20,953	45,984
Coventry-Warwickshire	37,223	29,877	67,100

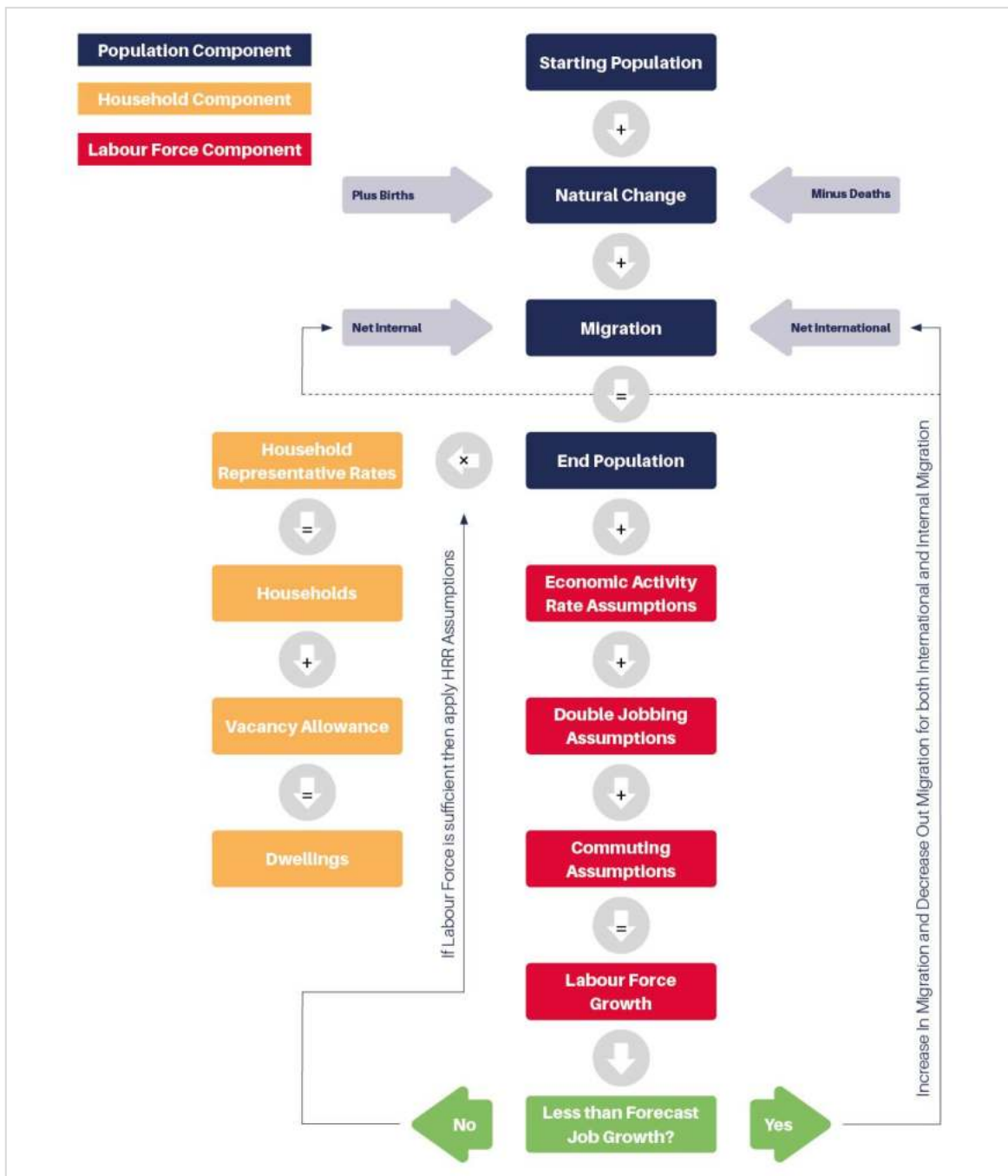
Source: Cambridge Econometrics

Economic Growth and Housing Need

- 7.23 The demographic model developed to look at housing need has been used to consider the link between jobs and housing. Within the modelling, migration assumptions have been changed so that the increase in the economically active population matches the increase in the resident workforce required. Adjustments are made to both in- and out-migration (e.g. if in-migration is increased by 1% then out-migration is reduced by 1%). In summary, the method includes the following assumptions:
- 7.24 In line with earlier assumptions on changes in economic participation and commuting, we assume an increase in the resident workforce in line with the growth in people in employment in the Borough (i.e. a 1:1 ratio between growth in people working in the Borough and residents in work) as well as modelling a continuation of commuting dynamics shown by the 2011 Census.
- 7.25 The analysis also assumes that 3.5% of people hold down more than one job (variable by local authority), such that the growth in people in work is slightly lower than total jobs growth. The modelling assumes that the effects of the pandemic on unemployment will have receded (with unemployment falling) over the period to 2022. As a result, we do not therefore assume that there is latent labour which could contribute to economic growth. If there was, this could have a modest effect in reducing the housing need.
- 7.26 The modelling also builds in assumptions on changes to economic participation taking account of increased longevity and later retirement. Assumptions from the Office for Budget Responsibility's 2018 Fiscal Sustainability Report have been adopted, which shows some increased economic participation in those in their 60s in particular (and particularly amongst women).

7.27 Once the level of economically active population matches the job growth forecast, the population (and its age structure) is modelled against the HRRs, using the HRRs in the 2014-based Household Projections with a 'part return to trend' adjustment to headship rates for those aged 25-44. The assumptions assume affordability improves in order to support improved household formation amongst younger households, moving back towards longer-term trends over time. A 3% vacancy allowance is then included in relating household growth to housing need, consistent with the approach earlier in this report. A full overview of the approach is set out in the Figure below.

Figure 7.6: Economic Led Housing Need Model



Source: Icen Projects

7.28 The first part of the analysis is to estimate what level of growth in the labour supply would be needed for the job growth forecast to be met. This calculation is shown below and for example shows that to meet 37,223 jobs there would need to be an increase in the economically active population of 35,742 persons in the Borough if a 1 to 1 ratio of residents to new jobs is used. This figure drops slightly (to 34,226) if Census commuting ratios are applied to the data.

Table 7.6 Forecast job growth and change in resident workforce with double jobbing and Census commuting patterns (2022-32)

	Number of additional jobs (2022-32)	Additional People in work (after double jobbing allowance) (i.e. 1:1 scenario)	Additional People in work (after commuting allowance)
Coventry	12,192	11,785	10,932
North Warwickshire	4,638	4,404	3,480
Nuneaton & Bedworth	2,979	2,898	3,848
Rugby	4,117	3,977	4,229
Stratford-on-Avon	6,387	6,075	5,825
Warwick	6,910	6,603	5,913
Warwickshire	25,031	23,958	23,294
Coventry-Warwickshire	37,223	35,742	34,226

Source: Derived from a range of sources

7.29 Drawing through the modelling assumptions set out upfront, the tables below show estimates of housing need set against the job growth scenarios. The analysis shows with 2011 Census commuting patterns a need across the whole HMA for 3,697 dwellings per annum; this increases slightly (to 3,792 per annum) if a 1 to 1 ratio between additional jobs and residents in employment is assumed.

Table 7.7 Economic-led Housing Need – linking to 2011 Census commuting patterns

	Households 2022	Households 2032	Change in households	Per annum	Dwellings (per annum)
Coventry	141,302	150,392	9,090	909	936
North Warwickshire	27,730	31,006	3,276	328	337
Nuneaton & Bedworth	57,334	61,548	4,214	421	434
Rugby	48,273	53,770	5,497	550	566
Stratford-on-Avon	61,153	68,715	7,561	756	779
Warwick	65,541	71,795	6,254	625	644
Warwickshire	260,031	286,834	26,803	2,680	2,761
Coventry-Warwickshire	401,332	437,226	35,893	3,589	3,697

Source: Demographic projections

Table 7.8 Economic-led Housing Need – linking to a 1:1 commuting pattern for additional jobs

	Households 2022	Households 2032	Change in households	Per annum	Dwellings (per annum)
Coventry	141,302	150,914	9,612	961	990
North Warwickshire	27,730	31,571	3,841	384	396
Nuneaton & Bedworth	57,334	60,950	3,616	362	372
Rugby	48,273	53,620	5,346	535	551
Stratford-on-Avon	61,153	68,871	7,717	772	795
Warwick	65,541	72,220	6,679	668	688
Warwickshire	260,031	287,231	27,200	2,720	2,802
Coventry-Warwickshire	401,332	438,145	36,812	3,681	3,792

Source: Demographic projections

Comparison with the Standard Method

- 7.30 Across the whole HMA, the economic forecasts do not suggest a need to increase housing numbers to ensure a sufficient labour-supply growth. Overall, it is estimated that between about 3,700 and 3,800 additional homes will be needed each year to provide a sufficient labour-supply. This compares with a need for around 4,900 homes (based on the preferred demographic projections applied through the standard method framework).
- 7.31 It is however worth briefly setting these figures out for individual local authorities (see table below). This shows for all areas apart from North Warwickshire that the need set against economic forecasts is generally lower than shown by the demographic based assessment.

Table 7.9 Comparing annual housing need under range of scenarios

	Standard Method	Standard Method (using 10-year trends)	Economic growth (Census commuting)	Economic growth (1:1 commuting)
Coventry	3,188	1,964	936	990
North Warwickshire	176	119	337	396
Nuneaton & Bedworth	435	409	434	372
Rugby	516	735	566	551
Stratford-on-Avon	564	868	779	795
Warwick	675	811	644	688
Warwickshire	2,366	2,942	2,761	2,802
Coventry-Warwickshire	5,554	4,906	3,697	3,792

Source: Range of sources

-
- 7.32 The evidence suggests there is no case for uplifting housing need at the HMA level to support economic growth. However for North Warwickshire, there is a case for higher housing provision than the standard method baseline to manage cross-boundary commuting. This can be achieved through questions of the distribution of housing provision; and North Warwickshire's existing Plan makes provision for meeting unmet needs from other areas (Coventry and Birmingham) which contribute to labour force growth and thus achieve this. These are however issues of distribution of housing need, rather than having any upward impact on the overall housing need given that the given inter-commuting between authorities it is appropriate to principally ensure that there is sufficient labour available at an HMA level.
- 7.33 For Nuneaton and Bedworth, the revised standard method figures generate a housing need which sits centrally between the economic parameters – meaning that the 409 dpa scenario would support local jobs growth assuming some reduction in the proportion of the workforce locally who commute out from the area. We consider this to be a realistic scenario given that out-commuting from the area is influenced by its relatively weaker employment base; and given the effects of changing working patterns.

8. AFFORDABLE HOUSING NEED

Introduction

- 8.1 This section provides an assessment of the need for affordable housing in Coventry & Warwickshire and the six local authorities. The analysis specifically considers general needs housing, with further analysis of specialist housing (e.g. for older people) being discussed later in the report.
- 8.2 The analysis follows the PPG (Sections 2a-018 to 2a-024) and provides two main outputs, linked to Annex 2 of the NPPF – this is firstly an assessment of the need for social/affordable rented housing and secondly to consider the need for affordable home ownership products. It should be noted that whilst the analysis is segmented between rented and home ownership products, it would technically be possible for there to be some overlap between the two – for example if a home to buy was at a sufficient discount to be available to households unable to rent market housing, then arguably it would be meeting some of the rental need.
- 8.3 The analysis also considers First Homes, which looks likely to become a new tenure of affordable housing (replacing other forms of affordable home ownership). Further information about First Homes was set out in a Planning Practice Guidance in May 2021.

Methodology Overview

- 8.4 The method for studying the need for affordable housing has been enshrined in Government practice guidance for many years, with an established approach to look at the number of households who are unable to afford market housing (to either rent or buy) – it is considered that this group will mainly be a target for rented affordable homes (social/affordable rented) and therefore the analysis looks a need for '*affordable housing for rent*' as set out in Annex 2 of the NPPF. The methodology for looking at the need for rented (social/affordable) housing considers the following:
- **Current affordable housing need:** an estimate of the number of households who have a need now, at the point of the assessment, based on data from the Council's Housing Register – this figure is then annualised so as to meet the current need over a period of time;
 - **Projected newly forming households in need:** using demographic projections to establish gross household formation, and then applying an affordability test to estimate numbers of such households unable to afford market housing;
 - **Existing households falling into need:** based on studying past trends in the types of households who have accessed social/affordable rented housing; and

-
- **Supply of affordable housing:** an estimate of the likely number of lettings that will become available from the existing social/affordable housing stock.

8.5 The first three bullet points above are added together to identify a gross need, from which the supply of relets of existing properties is subtracted to identify a net annual need for additional affordable housing. For the purposes of this assessment, this analysis is used to identify the overall (net) need for social/affordable rented housing.

8.6 This approach has traditionally been used to consider the needs of households who have not been able to afford market housing (either to buy or to rent). As the income necessary to afford to rent homes without financial support is typically lower than that needed to buy, the ability of households to afford private rents has influenced whether or not they are in need of affordable housing.

8.7 The NPPF and associated guidance has expanded the definition of those in affordable housing need to include households who might be able to rent without financial support but who aspire to own a home and require support to do so. The PPG includes households that “*cannot afford their own homes, either to rent, or to own, where that is their aspiration*” as having an affordable housing need.

8.8 This widened definition has been introduced by national Government to support increased access to home ownership, given evidence of declining home ownership and growth in private renting over the last 20 years or so. The PPG does not however provide specific guidance on how the needs of such households should be assessed and so this study adopts a broadly consistent methodology to that identified in the PPG which consider a current need; a newly-arising need on an annual basis; existing households falling into need; and an annual estimate of supply.

8.9 The analysis of affordable housing need is therefore structured to consider the need for rented affordable housing, and separately the need for affordable home ownership. The overall need is expressed as an annual figure, which can then be compared with likely future delivery (as required by PPG Paragraph 2a-024).

8.10 Whilst the need for social/affordable rented housing and affordable home ownership are analysed separately, there are a number of pieces of information that are common to both assessments. In particular, this includes an understanding of local housing costs, incomes and affordability. The sections below therefore look at these factors.

Local Price and Rents

8.11 An important part of the affordable needs model is to establish the entry-level costs of housing to buy and rent. The affordable housing needs assessment compares prices and rents with the incomes of

households to establish what proportion of households can meet their needs in the market, and what proportion require support and are thus defined as having an 'affordable housing need'. For the purposes of establishing affordable housing need, the analysis focuses on overall housing costs (for all dwelling types and sizes).

- 8.12 The analysis below considers the entry-level costs of housing to both buy and rent across the HMA. The approach has been to analyse Land Registry and ONS data to establish lower quartile prices and rents. Using a lower quartile figure is consistent with the PPG and reflects the entry-level point into the market recognising that the very cheapest properties may be of sub-standard quality.
- 8.13 Data from the Land Registry for the year to March 2022 shows estimated lower quartile property prices by dwelling type. The data shows that entry-level costs to buy are estimated to start from about £100,000 for a second-hand flat in Nuneaton & Bedworth and rising to £400,000 for a detached home in Warwick. Looking at the lower quartile price across all dwelling types, the analysis shows a lower quartile price of £155,000 in Nuneaton & Bedworth, rising to £245,000 in Stratford-on-Avon and Warwick. The figures are all based on cost of existing homes in the market although newbuild prices are considered later in this section when looking at potential costs of affordable home ownership properties.

Table 8.1 Estimated lower quartile cost of housing to buy by type (existing dwellings) – year to March 2022 – Coventry-Warwickshire

	Flat/ maisonette	Terraced	Semi- detached	Detached	All dwellings
Coventry	£105,000	£162,000	£191,000	£288,000	£164,000
North Warwickshire	£115,000	£151,000	£189,950	£280,000	£175,000
Nuneaton & Bedworth	£100,000	£135,000	£173,000	£255,000	£155,000
Rugby	£115,000	£166,000	£215,000	£320,000	£191,000
Stratford-on-Avon	£138,750	£217,500	£260,000	£390,000	£245,200
Warwick	£160,000	£245,000	£270,000	£400,000	£245,000

Source: Land Registry

- 8.14 It is also useful to provide estimates of property prices by the number of bedrooms in a home. Analysis for this draws together Land Registry data with an internet search of prices of homes for sale (using sites such as Rightmove). In many areas, there was less information about 1-bedroom homes and so these price estimates should be treated with some caution (no estimate has been made for North Warwickshire).

Table 8.2 Estimated lower quartile cost of housing to buy by size (existing dwellings) – year to March 2022 – local authorities

	1-bedroom	2-bedrooms	3-bedrooms	4-bedrooms	All dwellings
Coventry	£97,000	£140,000	£202,000	£264,000	£164,000
N Warwks	-	£141,000	£196,000	£309,000	£175,000
N & B	£97,000	£130,000	£189,000	£287,000	£155,000
Rugby	£116,000	£150,000	£237,000	£373,000	£191,000
SoA	£144,000	£201,000	£277,000	£432,000	£245,200
Warwick	£150,000	£204,000	£296,000	£438,000	£245,000

Source: Land Registry and Internet Price Search

- 8.15 A similar analysis has been carried out for private rents using ONS data – this covers a 12-month period to March 2022. For the rental data, information about dwelling sizes is provided (rather than types). The analysis shows costs both including and excluding room rents, although the difference is not significant in most areas. The analysis shows an average lower quartile cost (across all dwelling sizes excluding room rents) of between £580 per month in Nuneaton & Bedworth and £750 in Warwick.

Table 8.3 Lower Quartile Market Rents, year to March 2022

	Coventry	N Warwks	N & B	Rugby	SoA	Warwick
Room only	£390	-	£303	£420	£600	-
Studio	£450	£400	£420	£525	£423	£510
1-bedroom	£540	£463	£450	£550	£625	£650
2-bedrooms	£650	£600	£575	£660	£745	£785
3-bedrooms	£750	£695	£650	£795	£895	£925
4-bedrooms	£1,000	£950	£895	£1,055	£1,200	£1,250
All properties	£625	£600	£540	£625	£725	£750
Ex. room only	£635	£600	£580	£635	£725	£750

Source: ONS

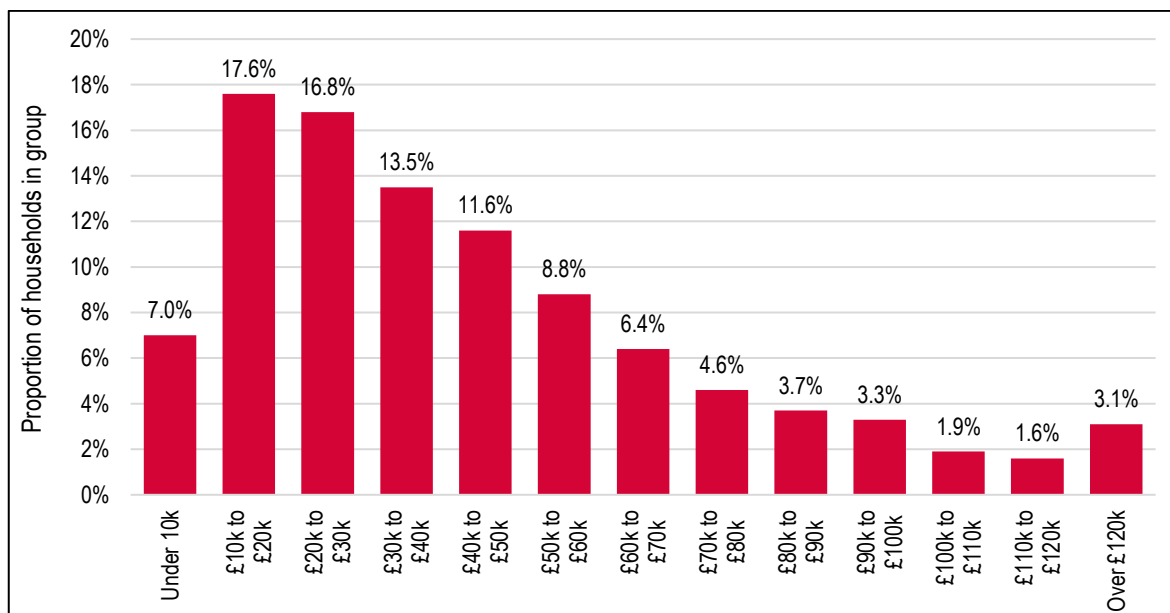
Household Incomes

- 8.16 Following on from the assessment of local prices and rents it is important to understand local income levels as these (along with the price/rent data) will determine levels of affordability (i.e. the ability of a household to afford to buy or rent housing in the market without the need for some sort of subsidy). Data about total household income has been based on ONS modelled income estimates, with

additional data from the English Housing Survey (EHS) being used to provide information about the distribution of incomes.

8.17 Drawing all of this data together an income distribution for each local authority has been constructed for 2022. The figure below shows the distribution of income for Coventry and Warwickshire. Across the whole study area around a quarter of households have an income below £20,000 with a further third in the range of £20,000 to £40,000. The average (mean) income is estimated to be around £44,300, with a median income of £36,100; the lower quartile income of all households is estimated to be £20,200..

Figure 8.1 Distribution of household income (2022) – Coventry-Warwickshire



Source: Derived from a range of data

8.18 Analysis has also been undertaken to estimate how incomes vary by local authority, with the table below showing the estimated median household income in each area, the table also shows the variance in incomes from the study area average. There is some variation in the estimated incomes by area, median figures ranging from £30,200 in Coventry, up to £42,700 in Warwick. It is notable that all authorities in Warwickshire (apart from Nuneaton & Bedworth) have an average income above the study area average.

Table 8.4 Estimated average (median) household income by local authority (mid-2022 estimate)

	Median income	As a % of C & W average
Coventry	£30,200	84%
North Warwickshire	£37,700	104%
Nuneaton & Bedworth	£33,600	93%
Rugby	£39,200	108%
Stratford-on-Avon	£43,100	119%
Warwick	£42,700	118%
Coventry-Warwickshire	£36,100	100%

Source: Derived from a range of data

Affordability Thresholds

- 8.19 To assess affordability two different measures are used; firstly to consider what income levels are likely to be needed to access private rented housing (this establishes those households in need of social/affordable rented housing) and secondly to consider what income level is needed to access owner occupation (this, along with the first test helps to identify households in the ‘gap’ between renting and buying). This analysis therefore brings together the data on household incomes with the estimated incomes required to access private sector housing. Additionally, different affordability tests are applied to different parts of the analysis depending on the group being studied (e.g. recognising that newly forming households are likely on average to have lower incomes than existing households).
- 8.20 To assess affordability two different measures are used; firstly to consider what income levels are likely to be needed to access private rented housing (this establishes those households in need of social/affordable rented housing) and secondly to consider what income level is needed to access owner occupation (this, along with the first test helps to identify households in the ‘gap’ between renting and buying). This analysis therefore brings together the data on household incomes with the estimated incomes required to access private sector housing. Additionally, different affordability tests are applied to different parts of the analysis depending on the group being studied (e.g. recognising that newly forming households are likely on average to have lower incomes than existing households).
- 8.21 A household is considered able to afford market rented housing in cases where the rent payable would constitute no more than a particular percentage of gross income. The choice of an appropriate threshold is an important aspect of the analysis – the PPG does not provide any guidance on this issue. CLG SHMA Guidance prepared in 2007 suggested that 25% of income is a reasonable start point, it also noted that a different figure could be used depending on local housing costs.

- 8.22 At £540-£750 per calendar month, lower quartile rent levels in Coventry & Warwickshire are typically average or above average in comparison to those seen nationally (a lower quartile rent of £595 for England in the year to March 2022). This would suggest that a proportion of income to be spent on housing could be higher than the bottom end of the range (the range starting from 25%). On balance, it is considered that a threshold of 30% is reasonable in a local context, to afford a £600 pcm rent (a typical figure across the study area) this would imply a gross household income of about £24,000 (and in net terms the rent would likely be around 36% of income).
- 8.23 In reality, many households may well spend a higher proportion of their income on housing and therefore would have less money for other living costs – for the purposes of this assessment these households would essentially be assumed as ideally having some form of subsidised rent so as to ensure a sufficient level of residual income.
- 8.24 Generally, the income required to access owner-occupied housing is higher than that required to rent and so the analysis of the need for social/affordable rented housing is based on the ability to afford to access private rented housing. However, local house prices (and affordability) are important when looking at the need for affordable home ownership.
- 8.25 For the purposes of this assessment, the income thresholds for owner-occupation assume a household has a 10% deposit and can secure a mortgage for four and a half times their salary. These assumptions are considered to be broadly in line with typical lending practices although it is recognised that there will be differences on a case by case basis.
- 8.26 The table below shows the estimated incomes required to both buy and rent (privately) in each local authority. This shows a notable 'gap' in most areas across the study area, particularly locations with higher house prices. The information in the tables below is taken forward into further analysis in this section to look at affordable needs in different locations.

Table 8.5 Estimated Household Income Required to Buy and Privately Rent by local authority – Coventry & Warwickshire

	To buy	To rent (privately)	Income gap
Coventry	£32,800	£25,400	£7,400
North Warwickshire	£35,000	£24,000	£11,000
Nuneaton & Bedworth	£31,000	£23,200	£7,800
Rugby	£38,200	£25,400	£12,800
Stratford-on-Avon	£49,040	£29,000	£20,040
Warwick	£49,000	£30,000	£19,000

Source: Based on Housing Market Cost Analysis

Need for Social/Affordable Rented Housing

8.27 The sections below work through the various stages of analysis to estimate the need for social/affordable housing in each local authority. Final figures are provided as an annual need (including an allowance to deal with current need). As per 2a-024 of the PPG, this figure can then be compared with likely delivery of affordable housing.

Current Need

8.28 In line with PPG paragraph 2a-020, the current need for affordable housing has been based on considering the likely number of households with one or more housing problems. The table below sets out the categories in the PPG and the sources of data being used to establish numbers. The PPG also includes a category where households cannot afford to own despite it being their aspiration – this category is considered separately in this report (under the title of the need for affordable home ownership).

Table 8.6 Main sources for assessing the current need for affordable housing

	Source	Notes
Homeless households (those in temporary accommodation)	MHCLG Statutory Homelessness data	Household in temporary accommodation at end of quarter.
Households in overcrowded housing	Census table LC4108EW	Analysis undertaken by tenure and updated by reference to national changes (from the English Housing Survey (EHS))
Concealed households	Census table LC1110EW	Number of concealed families
Existing affordable housing tenants in need	Modelled data linking to past survey analysis	Excludes overcrowded households – tenure estimates updated by reference to the EHS
Households from other tenures in need	Modelled data linking to past survey analysis	

Source: PPG [2a-020]

8.29 It should be noted that there may be some overlap between categories (such as overcrowding and concealed households, whereby the overcrowding would be remedied if the concealed household moved). The data available does not enable analysis to be undertaken to study the impact of this and so it is possible that the figures presented include a small element of double counting (although this is likely to be small). Additionally, some of the concealed households may be older people who have moved back in with their families and might not be considered as in need.

8.30 The table below shows the initial estimate of the number of households within each local authority with a current housing need. These figures are before any 'affordability test' has been applied to

assess the ability of households to meet their own housing needs; and has been termed ‘the number of households in unsuitable housing’. Overall, the analysis estimates that there are currently some 31,000 households living in unsuitable housing (or without housing), with around half of these being in Coventry.

Table 8.7 Estimated Number of Households Living in Unsuitable Housing – Coventry & Warwickshire

	Homeless/ concealed households	Households in overcrowded housing	Existing affordable housing tenants in need	Households from other tenures in need	Total
Coventry	2,469	8,747	496	3,561	15,273
North Warwickshire	292	775	84	531	1,683
Nuneaton & Bedworth	729	1,670	173	1,131	3,703
Rugby	469	1,256	136	954	2,815
Stratford-on-Avon	539	1,060	152	1,146	2,897
Warwick	705	2,208	178	1,522	4,614
Warwickshire	2,734	6,970	723	5,284	15,711
C & W	5,203	15,717	1,219	8,845	30,984

Source: MHCLG Live Tables, Census 2011 and Data Modelling

- 8.31 In taking this estimate forward, the data modelling next estimates housing unsuitability by tenure. From the overall number in unsuitable housing, households living in affordable housing are excluded (as these households would release a dwelling on moving and so no net need for affordable housing will arise). The analysis also excludes 90% of owner-occupiers under the assumption (which is supported by analysis of survey data) that the vast majority will be able to afford housing once savings and equity are taken into account.
- 8.32 A final adjustment is to slightly reduce the unsuitability figures in the private rented sector to take account of student-only households – such households could technically be overcrowded/living in unsuitable housing but would be unlikely to be allocated affordable housing (student needs are essentially assumed to be transient). Once these households are removed from the analysis, the remainder are taken forward for affordability testing.
- 8.33 The tables below show it is estimated that there are around 17,400 households living in unsuitable housing (excluding current social tenants and the majority of owner-occupiers) in Coventry & Warwickshire.

Table 8.8 Unsuitable Housing by Tenure and Number to Take Forward into Affordability Modelling (Coventry & Warwickshire)

	In Unsuitable Housing	Number to Take Forward for Affordability Testing
Owner-occupied	7,429	743
Affordable housing	6,048	0
Private rented	12,304	11,464
No housing (homeless/concealed)	5,203	5,203
Total	30,984	17,410

Source: MHCLG Live Tables, Census 2011 and Data Modelling

- 8.34 Having established this figure, it needs to be considered that a number of these households might be able to afford market housing without the need for subsidy. To consider this, the income data has been used, with the distribution adjusted to reflect a lower average income amongst households living in unsuitable housing – for the purposes of the modelling an income distribution that reduces the average household income to 88% of the figure for all households has been used to identify the proportion of households whose needs could not be met within the market (for households currently living in housing). A lower figure of 42% has been used to apply an affordability test for the concealed/homeless households who do not currently occupy housing.
- 8.35 These two percentage figures have been based on a consideration of typical income levels of households who are in unsuitable housing (based mainly on estimates in the private rented sector) along with typical income levels of households accessing social rented housing (for those without accommodation).
- 8.36 The figures have been based on analysis of the English Housing Survey (mainly looking at relative incomes of households in each of the private and social rented sectors) as well as consideration of similar information collected through household surveys across the country by JGC. These modelling assumptions are considered reasonable and have not been challenged through the Local Plan process in other locations (where the same assumptions have been used).
- 8.37 Overall, around half of households with a current need are estimated to be likely to have insufficient income to afford market housing and so the estimate of the total current need is around 9,300 households across the study area – around half of the need estimated to be arising in the City. The table below shows how this is estimated to vary by local authority.

Table 8.9 Estimated Current Affordable Housing Need (for social/affordable rented housing)

	In unsuitable housing (taken forward for affordability test)	% Unable to Afford Market Housing (without subsidy)	Revised Gross Need (including Affordability)
Coventry	8,590	57.6%	4,952
North Warwickshire	832	47.7%	397
Nuneaton & Bedworth	1,947	52.2%	1,016
Rugby	1,664	46.2%	768
Stratford-on-Avon	1,651	49.1%	810
Warwick	2,726	48.4%	1,320
Warwickshire	8,819	48.9%	4,312
C & W	17,410	53.2%	9,264

Source: CLG Live Tables, Census 2011 and Data Modelling

- 8.38 The estimated figures shown above represents the number of households with a need currently. For the purposes of analysis, it is assumed that the local authorities would seek to meet this need over a period of time. To be consistent with the main period studied in the demographic projections (a ten-year period from 2022 to 2032) the need is annualised by dividing by 10 (to give an annual need for 926 dwellings across all areas). This does not mean that some households would be expected to wait 10-years for housing as the need is likely to be dynamic, with households leaving the current need as they are housed but with other households developing a need over time.

Newly Forming Households

- 8.39 The number of newly forming households has been estimated through demographic modelling with an affordability test also being applied. This has been undertaken by considering the changes in households in specific 5-year age bands relative to numbers in the age band below, 5 years previously, to provide an estimate of gross household formation.
- 8.40 The number of newly-forming households is limited to households forming who are aged under 45 – this is consistent with CLG guidance (from 2007) which notes after age 45 that headship (household formation) rates ‘plateau’. There may be a small number of household formations beyond age 45 (e.g. due to relationship breakdown) although the number is expected to be fairly small when compared with formation of younger households.
- 8.41 The number of newly forming households has been estimated through demographic modelling (linked to the alternative population projections and 2014-based HRRs). This is considered to provide the best view about trend-based household formation in Coventry & Warwickshire.

- 8.42 In assessing the ability of newly forming households to afford market housing, data has been drawn from previous surveys undertaken nationally by JGC. This establishes that the average income of newly forming households is around 84% of the figure for all households. This figure is remarkably consistent across areas (and is also consistent with analysis of English Housing Survey data at a national level).
- 8.43 The analysis has therefore adjusted the overall household income data to reflect the lower average income for newly forming households. The adjustments have been made by changing the distribution of income by bands such that average income level is 84% of the all household average. In doing this it is possible to calculate the proportion of households unable to afford market housing. For the purposes of the need for social/affordable rented housing this will relate to households unable to afford to buy OR rent in the market.
- 8.44 The assessment suggests overall that around two-fifths of newly forming households will be unable to afford market housing (to rent privately) and this equates a total of 3,600 newly forming households will have a need per annum on average across the study area – the table below provides a breakdown by local authority.

Table 8.10 Estimated Need for Social/Affordable Rented Housing from Newly Forming Households (per annum) – Coventry & Warwickshire

	Number of new households	% unable to afford	Annual newly forming households unable to afford to rent
Coventry	3,332	50.0%	1,667
North Warwickshire	446	36.7%	163
Nuneaton & Bedworth	1,060	40.6%	431
Rugby	1,053	37.8%	398
Stratford-on-Avon	1,024	38.7%	397
Warwick	1,400	40.8%	571
Warwickshire	4,982	39.3%	1,959
C & W	8,314	43.6%	3,627

Source: Projection Modelling/Affordability Analysis

Existing Households Falling into Affordable Housing Need

- 8.45 The second element of newly arising need is existing households falling into need. To assess this, information about past lettings in social/affordable rented has been used. The assessment looked at households who have been housed in general needs housing over the past three years – this group will represent the flow of households onto the Housing Register over this period. From this, newly forming households (e.g. those currently living with family) have been discounted as well as

households who have transferred from another social/affordable rented property. An affordability test has also been applied.

8.46 This method for assessing existing households falling into need is consistent with the 2007 SHMA guide which says on page 46 that *‘Partnerships should estimate the number of existing households falling into need each year by looking at recent trends. This should include households who have entered the housing register and been housed within the year as well as households housed outside of the register (such as priority homeless household applicants)’*.

8.47 Following the analysis through suggests a need arising from 1,501 existing households each year across the study area, with just over half of these households being in Coventry. The table below breaks this down by local authority.

Table 8.11 Estimated Need for Social/Affordable Rented Housing from Existing Households Falling into Need (per annum) – Coventry & Warwickshire

	Total Additional Need	% of Total
Coventry	653	43.5%
North Warwickshire	52	3.5%
Nuneaton & Bedworth	188	12.5%
Rugby	166	11.0%
Stratford-on-Avon	238	15.9%
Warwick	204	13.6%
Warwickshire	848	56.5%
C & W	1,501	100.0%

Source: Derived from a range of sources

Supply of Social/Affordable Rented Housing Through Relets

8.48 The future supply of affordable housing through relets is the flow of affordable housing arising from the existing stock that is available to meet future need. This focusses on the annual supply of social/affordable rent relets.

8.49 The Practice Guidance suggests that the estimate of likely future relets from the social rented stock should be based on past trend data which can be taken as a prediction for the future. Information from CoRe has been used to establish past patterns of social housing turnover. The figures are for general needs lettings but exclude lettings of new properties and also exclude an estimate of the number of transfers from other social rented homes. These exclusions are made to ensure that the figures presented reflect relets from the existing stock.

8.50 On the basis of past trend data it has been estimated that 2,221 units of social/affordable rented housing are likely to become available each year moving forward for occupation by newly forming

households and existing households falling into need from other tenures – around two-fifths of the supply is expected to arise in Coventry.

Table 8.12 Analysis of Past Social/Affordable Rented Housing Supply, 2018/19 – 2020/21 (average per annum) – Coventry & Warwickshire

	Total Lettings	% as Non-New Build	Lettings in Existing Stock	% Non-Transfers	Lettings to New Tenants
Coventry	1,506	88.2%	1,329	69.9%	929
North Warwickshire	219	91.0%	199	62.4%	124
Nuneaton & Bedworth	588	79.1%	465	67.3%	313
Rugby	480	73.4%	352	66.2%	233
Stratford-on-Avon	786	68.5%	539	55.1%	297
Warwick	782	73.2%	572	56.8%	325
Warwickshire	2,855	74.5%	2,128	60.7%	1,292
C & W	4,361	79.3%	3,457	64.3%	2,221

Source: CoRe/LAHS

- 8.51 The PPG model also includes the bringing back of vacant homes into use and the pipeline of affordable housing as part of the supply calculation. These have however not been included within the modelling in this report. Firstly, there is no evidence of any substantial stock of vacant homes (over and above a level that might be expected to allow movement in the stock). Secondly, with the pipeline supply, it is not considered appropriate to include this as to net off new housing would be to fail to show the full extent of the need, although in monitoring it will be important to net off these dwellings as they are completed.

Net Need for Social/Affordable rented Housing

- 8.52 The table below shows the overall calculation of affordable housing need. The analysis shows that there is a need for 3,833 dwellings per annum across the area – an affordable need is seen in all local authorities. The net need is calculated as follows:

$$\text{Net Need} = \text{Current Need (allowance for)} + \text{Need from Newly-Forming Households} + \text{Existing Households falling into Need} - \text{Supply of Affordable Housing}$$

Table 8.13 Estimated Need for Social/Affordable Rented Housing by local authority (per annum)

	Current need	Newly forming households	Existing households falling into need	Total Gross Need	Relet Supply	Net Need
Coventry	495	1,667	653	2,816	929	1,887
North Warwickshire	40	163	52	256	124	131
Nuneaton & Bedworth	102	431	188	720	313	407
Rugby	77	398	166	640	233	407
Stratford-on-Avon	81	397	238	716	297	419
Warwick	132	571	204	907	325	582
Warwickshire	431	1,959	848	3,238	1,292	1,946
C & W	926	3,627	1,501	6,054	2,221	3,833

Source: Range of sources

The Relationship Between Affordable Need and Overall Housing Need

8.53 The PPG is clear that there is not a direct relationship between affordable need and overall housing need. This is appropriate as the affordable need figures do not relate only to net changes in households but take account of the need for different types of housing from existing households. By implication the affordable needs figures shown reflect in part a tenure imbalance within the existing housing stock. Specifically, the PPG sets out in Para 67-001

How do the housing need of particular groups relate to overall housing need calculated using the standard method?

The standard method for assessing local housing need identifies an overall minimum average annual housing need figure but does not break this down into the housing need of individual groups.

This need may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method. How can needs of different groups be planned for?

Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:

- the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);
- the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and
- the anticipated deliverability of different forms of provision, having regard to viability.

Authorities must also consider the implications of their duties under the Equality Act 2010, including the Public Sector Equality Duty.

Plan-making authorities should assess the need for housing of different groups and reflect this in planning policies.

When producing policies to address the need of specific groups, plan-making authorities will need to consider how the needs of individual groups can be addressed having regard to deliverability.

The household projections that form the baseline of the standard method are inclusive of all households including travellers as defined in [Planning policy for traveller sites](#).

- 8.54 However this needs to be read alongside PPG 2a-024 which encourages local authorities to consider increasing planned housing numbers where this can help to meet the identified affordable need. Specifically, the wording of the PPG [2a-024] states:

'The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the strategic plan may need to be considered where it could help deliver the required number of affordable homes'

- 8.55 The analysis estimates an annual need for 3,833 rented affordable homes, which is notionally 78% of a Local Housing Need of 4,906 dwellings per annum (as calculated using the Standard Method and the alternative population projection). The figures for individual authorities are set out below.
- 8.56 Current policy requirements for affordable housing, informed by viability evidence, expect between 20-40% affordable housing on qualifying sites. Actual delivery through planning obligations in many cases will be lower as some housing is delivered on sites below thresholds set out in policies, through permitted development or with lower provision due to site-specific viability issues. The right hand column in the table shows what level of provision of housing overall would be necessary to fully meet the affordable need and shows this would require approaching 14,000 homes a year across the HMA. This is evidently unrealistic, and the wider evidence in this report does not suggest that there is sufficient market housing demand or households to support this level of provision. Nonetheless it does support efforts to boost affordable housing delivery.

Table 8.14 Relating Affordable Need to the Adjusted Standard Method Findings

	Net Rented Need	Adjusted Standard Method	Affordable % Standard Method	Affordable Housing Policy Requirement	Notional Provision to Meet Rented Affordable Need in Full
Coventry	1,887	1,964	96%	25%	7,548
North Warwickshire	131	119	110%	30-40%	374
Nuneaton & Bedworth	407	409	100%	25%	1,628
Rugby	407	735	55%	20-30%	1,628
Stratford-on-Avon	419	868	48%	35%	1,197
Warwick	582	811	72%	40%	1,455
Warwickshire	1,946	2,942	66%		6,282
C & W	3,833	4,906	78%		13,830

- 8.57 The relationship between affordable housing need and overall housing need is clearly complex. This was recognised in the Planning Advisory Service (PAS) Technical Advice Note of July 2015. PAS conclude that there is no arithmetical way of combining the OAN (calculated through demographic projections) and the affordable need. There are a number of reasons why the two cannot be ‘arithmetically’ linked.
- 8.58 Firstly, the modelling contains a category in the projection of ‘*existing households falling into need*’; these households already have accommodation and hence if they were to move to alternative accommodation, they would release a dwelling for use by another household – there is no net need to provide additional homes. The modelling also contains ‘*newly forming households*’; these households are a direct output from the demographic modelling and are therefore already included in the overall housing need figures.
- 8.59 This just leaves the ‘*current need*’; much of this group will be similar to the existing households already described (in that they are already living in accommodation) although it is possible that a number will be households without housing (mainly concealed households) – these households are not included in the demographic modelling and so are arguably an additional need, although uplifts for market signals/affordability (as included in the Government’s Standard Method) would be expected to deal with such households.
- 8.60 However, as noted, caution should be exercised in trying to make a direct link between affordable need and planned delivery, with the key point being that many of those households picked up as having a need will already be living in housing and so providing an affordable option does not lead to an overall net increase in the need for housing (as they would vacate a home to be used by someone else).

8.61 It is possible to investigate this in some more detail by re-running the model and excluding those already living in accommodation. This is shown in the table below which identifies that meeting these needs would lead to an affordable need for 1,812 homes per annum across the study area – notionally 37% of the Standard Method (based on the alternative demographic projection). This figure is theoretical and should not be seen to be minimising the need (which is clearly acute). It does however serve to show that there is a substantial difference in the figures when looking at overall housing shortages.

8.62 Indeed the main group of households in need are newly forming households. These households are already included within demographic projections and so the demonstrating of a need for this group again should not be seen as over and above any need derived through the normal process of looking at need. Indeed, only the 407 per annum (current need) is in addition to demographic projections and this scale of uplift will already have been included in figures when moving from a demographic starting point to an estimate of housing need using the Standard Method.

Table 8.15 Estimated Need for Social/Affordable Rented Housing by local authority (per annum) – excluding existing households

	Current need	Newly forming households	Existing households falling into need	Total Gross Need	Relet Supply	Net Need
Coventry	203	1,667	0	1,871	929	941
North Warwickshire	21	163	0	185	124	60
Nuneaton & Bedworth	55	431	0	485	313	172
Rugby	34	398	0	432	233	198
Stratford-on-Avon	40	397	0	437	297	140
Warwick	54	571	0	625	325	300
Warwickshire	204	1,959	0	2,163	1,292	871
C & W	407	3,627	0	4,034	2,221	1,812

Source: Range of sources

8.63 Additionally, it should be noted that the need estimate is on a per annum basis and should not be multiplied by the plan period to get a total need. Essentially, the estimates are for the number of households who would be expected to have a need in any given year (i.e. needing to spend more than 30% of income on housing). In reality, some (possibly many) households would see their circumstances change over time such that they would 'fall out of need' and this is not accounted for in the analysis. One example would be a newly forming household with an income level that means they spend more than 30% of income on housing, as the household's income rises they would potentially pass the affordability test and therefore not have an affordable need. Additionally, there is the likelihood when looking over the longer-term that a newly-forming household will become an

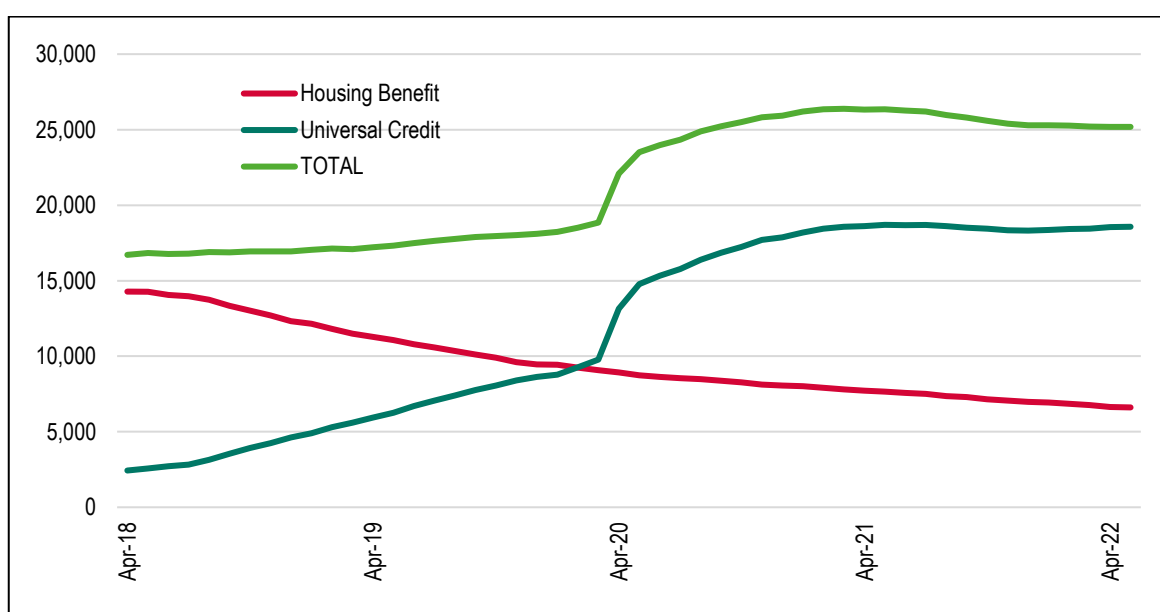
-
- existing household in need and would be counted twice if trying to multiply the figures out for a whole plan period.
- 8.64 The affordable need shown is a reflection in part of historical funding decisions and Right-to-Buy sales which have influenced the level of provision of affordable homes.
- 8.65 It is however worth briefly thinking about how affordable need works in practice and the housing available to those unable to access market housing without Housing Benefit. In particular, the increasing role played by the Private Rented Sector (PRS) in providing housing for households who require financial support in meeting their housing needs should be recognised.
- 8.66 Whilst the Private Rented Sector (PRS) does not fall within the types of affordable housing set out in the NPPF (other than affordable private rent which is a specific tenure separate from the main 'full market' PRS), it has evidently been playing a role in meeting the needs of households who require financial support in meeting their housing need. Government recognises this, and indeed legislated through the 2011 Localism Act to allow Councils to discharge their "homelessness duty" through providing an offer of a suitable property in the PRS.
- 8.67 It is also worth reflecting on the NPPF (Annex 2) definition of affordable housing. This says: *'Affordable housing: housing for sale or rent, for those whose needs are not met by the market'* [emphasis added]. Clearly where a household is able to access suitable housing in the private rented sector (with or without Housing Benefit) it is the case that these needs are being met by the market (as within the NPPF definition). As such the role played by the private rented sector should be recognised – it is evidently part of the functioning housing market.
- 8.68 Data from the Department of Work and Pensions (DWP) has been used to look at the number of Housing Benefit supported private rented homes. As of May 2022, it is estimated that there were nearly 25,200 benefit claimants in the private rented sector in Coventry and Warwickshire. From this, it is clear that the PRS contributes to the wider delivery of 'affordable homes' with the support of benefit claims, and further complicates any attempts to find a relationship between affordable need and overall housing need.
- 8.69 The table below shows the number of households in each authority claiming Housing Benefit or Universal Credit where there is a housing entitlement (in the PRS). The figure below the table shows the trend in the number of claimants for the whole study area. This shows there has been a notable increase since March 2020, which is likely to be related to the Covid-19 pandemic. However, even the more historical data shows a substantial number of households claiming benefit support for their housing in the private sector (typically around 17,000-18,000 households).

Table 8.16 Number of Housing Benefit claimants in the private rented sector – local authorities (May 2022)

	Housing Benefit	Universal Credit (with housing allowance)	TOTAL
Coventry	3,544	9,661	13,205
North Warwickshire	437	1,001	1,438
Nuneaton & Bedworth	1,075	3,138	4,213
Rugby	429	2,079	2,508
Stratford-on-Avon	568	1,319	1,887
Warwick	556	1,382	1,938
C & W	6,611	18,580	25,191

Source: Department of Work and Pensions

Figure 8.2 Number of Housing Benefit claimants in the Private Rented Sector – Coventry & Warwickshire



Source: Department of Work and Pensions

- 8.70 Delivery of affordable housing through planning obligations is an important, but not the only means, of delivery affordable housing; and the Councils should also work with housing providers to secure funding to support enhanced affordable housing delivery on some sites and through use of its own land assets.
- 8.71 Overall, it is difficult to link the need for affordable housing to the overall housing need. Put simply the two do not measure the same thing and interpreting the affordable need figure consideration needs to be given to the fact that many households already live in housing, and do not therefore generate an overall net need for an additional home. Further issues arise as the need for affordable housing is complex and additionally the extent of concealed and homeless households needs to be understood as well as the role played by the private rented sector.

8.72 The analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the six authorities. It does however need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. As noted previously, the evidence does however suggest that affordable housing delivery should be maximised where opportunities arise. It is a consideration in setting overall housing targets, but it should be recognised that viability and the availability of funding are realistically constraints on the level of provision which can be achieved.

Split Between Social and Affordable Rented Housing

8.73 The analysis above has studied the overall need for social and affordable rented housing with a focus on households who cannot afford to rent in the market. These households will therefore have a need for some form of rented housing at a cost below typical market rates. Typically, there are two main types of rented affordable accommodation (social and affordable rented) with the analysis below initially considering what a reasonable split might be between these two tenures.

8.74 An analysis has been undertaken to compare the income distribution of households with the cost of different products. Data about average social and affordable rents has been taken from the Regulator of Social Housing (RSH) and this is compared with lower quartile and median market rents (from ONS data). This analysis shows that social rents are lower than affordable rents; the analysis also shows that affordable rents are less than both lower quartile and median market rents – the data is fairly consistent across areas.

Table 8.17 Comparison of rent levels for different products – Coventry (2020/21)

	Social rent	Affordable rent (AR)	Lower quartile (LQ) market rent	Median market rent	AR as % of LQ	AR as % of median
1-bedroom	£325	£406	£540	£615	75%	66%
2-bedrooms	£378	£484	£650	£725	74%	67%
3-bedrooms	£418	£529	£750	£825	70%	64%
4-bedrooms	£471	£637	£1,000	£1,250	64%	51%
All	£374	£495	£635	£730	78%	68%

Source: RSH and ONS

Table 8.18 Comparison of rent levels for different products – North Warwickshire (2020/21)

	Social rent	Affordable rent (AR)	Lower quartile (LQ) market rent	Median market rent	AR as % of LQ	AR as % of median
1-bedroom	£353	£415	£463	£528	90%	79%
2-bedrooms	£419	£490	£600	£650	82%	75%
3-bedrooms	£455	£532	£695	£775	77%	69%
4-bedrooms	£501	£705	£950	£1,025	74%	69%
All	£427	£507	£600	£695	84%	73%

Source: RSH and ONS

Table 8.19 Comparison of rent levels for different products – Nuneaton & Bedworth (2020/21)

	Social rent	Affordable rent (AR)	Lower quartile (LQ) market rent	Median market rent	AR as % of LQ	AR as % of median
1-bedroom	£345	£408	£450	£475	91%	86%
2-bedrooms	£415	£494	£575	£625	86%	79%
3-bedrooms	£463	£547	£650	£695	84%	79%
4-bedrooms	£523	£723	£895	£935	81%	77%
All	£419	£508	£580	£625	88%	81%

Source: RSH and ONS

Table 8.20 Comparison of rent levels for different products – Rugby (2020/21)

	Social rent	Affordable rent (AR)	Lower quartile (LQ) market rent	Median market rent	AR as % of LQ	AR as % of median
1-bedroom	£360	£429	£550	£595	78%	72%
2-bedrooms	£428	£539	£660	£700	82%	77%
3-bedrooms	£467	£634	£795	£875	80%	72%
4-bedrooms	£543	£836	£1,055	£1,200	79%	70%
All	£436	£561	£635	£695	88%	81%

Source: RSH and ONS

Table 8.21 Comparison of rent levels for different products – Stratford-on-Avon (2020/21)

	Social rent	Affordable rent (AR)	Lower quartile (LQ) market rent	Median market rent	AR as % of LQ	AR as % of median
1-bedroom	£386	£503	£625	£675	80%	74%
2-bedrooms	£449	£604	£745	£775	81%	78%
3-bedrooms	£492	£680	£895	£1,025	76%	66%
4-bedrooms	£615	£806	£1,200	£1,400	67%	58%
All	£463	£616	£725	£795	85%	78%

Source: RSH and ONS

Table 8.22 Comparison of rent levels for different products – Warwick (2020/21)

	Social rent	Affordable rent (AR)	Lower quartile (LQ) market rent	Median market rent	AR as % of LQ	AR as % of median
1-bedroom	£387	£525	£650	£700	81%	75%
2-bedrooms	£467	£639	£785	£850	81%	75%
3-bedrooms	£528	£721	£925	£1,050	78%	69%
4-bedrooms	£612	£879	£1,250	£1,500	70%	59%
All	£464	£639	£750	£870	85%	73%

Source: RSH and ONS

8.75 For the affordability test, a standardised average rent for each product has been used. The table below suggests that around 19%-32% of households who cannot afford to rent privately could afford an affordable rent, with a further 19%-28% being able to afford a social rent (but not an affordable one). A total of 44%-62% of households would need some degree of benefit support to be able to afford their housing (regardless of the tenure).

Table 8.23 Estimated need for affordable rented housing (% of households able to afford)

	Afford affordable rent	Afford social rent	Need benefit support	All unable to afford market
Coventry	32%	21%	46%	100%
North Warwks	26%	19%	55%	100%
N & B	19%	20%	62%	100%
Rugby	27%	24%	49%	100%
SoA	29%	27%	44%	100%
Warwick	26%	28%	45%	100%
Warwickshire	25%	25%	50%	100%
C & W	28%	23%	49%	100%

Source: Affordability analysis

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- 8.76 The finding that only 19%-32% of households can afford an affordable rent does not automatically lead to a policy conclusion on the split between the two types of housing. For example, many households who will need to access rented accommodation will be benefit dependent and as such could technically afford an affordable rent – hence a higher proportion of affordable rented housing might be appropriate – indeed the analysis does identify a substantial proportion of households as being likely to need benefit support. On the flip side, providing more social rents might enable households to return to work more easily, as a lower income would potentially be needed to afford the lower social (rather than affordable) rent.
- 8.77 There will be a series of other considerations both at a strategic level and for specific schemes. For example, there may be funding streams that are only available for a particular type of housing, and this may exist independently to any local assessment of need. Additionally, there will be the consideration of the balance between the cost of housing and the amount that can be viably provided, for example, it is likely that affordable rented housing is more viable, and therefore a greater number of units could be provided. Finally, in considering a split between social and affordable rented housing it needs to be considered that having different tenures on the same site (at least at initial occupation) may be difficult – e.g. if tenants are paying a different rent for essentially the same size/type of property and services. These are issues for the Councils to consider in formulating policies for affordable housing as part of individual local plans.
- 8.78 The evidence indicates that around 20-30% of the rented need identified should theoretically be met through provision of social rented homes; but there are wider considerations to be taken into account in determining policies for new-build development, including individual council's priorities, what rents are charged for existing stock and viability considerations.

Establishing a Need for Affordable Home Ownership

- 8.79 The Planning Practice Guidance confirms a widening definition of those to be considered as in affordable need; now including 'households which can afford to rent in the private rental market, but cannot afford to buy despite a preference for owning their own home'. However, at the time of writing, there is no guidance about how the number of such households should be measured.
- 8.80 The methodology used in this report therefore draws on the current methodology, and includes an assessment of current needs, and projected need (newly forming and existing households). The key difference is that in looking at affordability an estimate of the number of households in the 'gap' between buying and renting is used. There is also the issue of establishing an estimate of the supply of affordable home ownership homes – this is considered separately below.
- 8.81 The analysis has been developed in the context of First Homes with the Government proposing that

25% of all affordable housing secured through developer contributions should be within this tenure. A definition of First Homes (from the relevant PPG (70-001)) can be found later in this document.

Gross Need for Affordable Home Ownership

- 8.82 The first part of the analysis seeks to understand what the gap between renting and buying actually means in the study area – in particular establishing the typical incomes that might be required. The information about incomes required to both buy and rent in different locations has already been provided earlier in this section and so the discussion below is a broad example.
- 8.83 Using the income distributions developed (as set out earlier in this section) along with data about price and rents, it has been estimated that of all households living in the private rented sector, around 41% already have sufficient income to buy a lower quartile home, with 18% falling in the rent/buy ‘gap’. The final 41% are estimated to have an income below which they cannot afford to rent privately (i.e. would need to spend more than the calculated threshold of their income on housing costs) although in reality it should be noted that many households will spend a higher proportion of their income on housing. These figures have been based on an assumption that incomes in the private rented sector are around 88% of the equivalent figure for all households (a proportion derived from the English Housing Survey) and are used as it is clear that affordable home ownership products are likely to be targeted at households living in or who might be expected to access this sector (e.g. newly forming households).
- 8.84 The table below shows an estimate of the proportion of households living in the private rented sector who are able to afford different housing products by local authority. This shows a higher proportion of households in the rent/buy gap in Stratford-on-Avon and Warwick. Lower figures can be seen in Coventry and Nuneaton & Bedworth.

Table 8.24 Estimated proportion of households living in Private Rented Sector able to buy and/or rent market housing – Coventry & Warwickshire

	Can afford to buy OR rent	Can afford to rent but not buy	Cannot afford to buy OR rent
Coventry	40%	12%	48%
North Warwickshire	47%	18%	35%
Nuneaton & Bedworth	48%	14%	39%
Rugby	44%	20%	36%
Stratford-on-Avon	36%	27%	37%
Warwick	36%	26%	39%
C & W	41%	18%	41%

Source: Derived from Housing Market Cost Analysis and Affordability Testing

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- 8.85 The finding that a significant proportion of households in the private rented sector are likely to have an income that would allow them to buy a home is also noteworthy and suggests that for many households, barriers to accessing owner-occupation are less about income/the cost of housing and more about other factors (which could for example include the lack of a deposit or difficulties obtaining a mortgage (for example due to a poor credit rating or insecure employment)). However, some households will choose to privately rent, for example as it is a more flexible option that may be more suitable for a particular household's life stage (e.g. if moving locations with employment).
- 8.86 To study current need, an estimate of the number of household living in the Private Rented Sector (PRS) has been established, with the same (rent/buy gap) affordability test (as described above) then applied. The start point is the number of households living in private rented accommodation; as of the 2011 Census there were some 59,100 households living in the sector across the study area. Data from the English Housing Survey (EHS) suggests that since 2011, the number of households in the PRS has risen by about 19% - if the same proportion is relevant to Coventry & Warwickshire then the number of households in the sector would now be around 70,300.
- 8.87 Additional data from the EHS suggests that 60% of all PRS households expect to become an owner at some point (42,200 households if applied to C & W) and of these some 40% (16,900 households) would expect this to happen in the next 2-years. These figures are taken as the number of households potentially with a current need for affordable home ownership before any affordability testing.
- 8.88 As noted above, on the basis of income it is estimated that around 12%-27% of the private rented sector sit in the gap between renting and buying (depending on location). Applying this proportion to the above figures would suggest a current need for around 2,900 affordable home ownership units (295 per annum if annualised over a 10-year period).
- 8.89 In projecting forward, the analysis can consider newly forming households and also the remaining existing households who expect to become owners further into the future. Applying the same affordability test (albeit on a very slightly different income assumption for newly forming households) suggests an annual need from these two groups of around 1,931 dwellings (1,489 from newly forming households and 442 from existing households in the private rented sector).
- 8.90 Bringing together the above analysis suggests that there is a need for around 2,226 affordable home ownership homes (priced for households able to afford to rent but not buy) per annum across the study area. This is before any assessment of the potential supply of housing is considered.

Table 8.25 Estimated Gross Need for Affordable Home Ownership by local authority (per annum) – Coventry & Warwickshire

	Current need	Newly forming households	Existing households falling into need	Total Gross Need
Coventry	92	403	138	633
North Warwks	15	82	23	120
N & B	26	148	40	214
Rugby	33	213	50	296
SoA	51	282	77	410
Warwick	77	361	115	553
Warwickshire	203	1,086	304	1,593
C & W	295	1,489	442	2,226

Source: Range of sources

Potential Supply of Housing to Meet the Affordable Home Ownership Need and Net Need

- 8.91 As with the need for social/affordable rented housing, it is also necessary to consider if there is any supply of affordable home ownership products from the existing stock of housing. As with assessing the need for affordable home ownership, it is the case that at present the PPG does not include any suggestions about how the supply of housing to meet these needs should be calculated.
- 8.92 One source is likely to be resales of low cost home ownership products with data from the Regulator of Social Housing showing a total stock in 2021 of 3,948 homes. If these homes were to turnover at the same rate seen for the social housing stock then they would be expected to generate around 140 resales each year. These properties would be available for these households and can be included as the potential supply.
- 8.93 In addition, it should be noted that the analysis looks at households unable to afford a lower quartile property price. By definition, a quarter of all homes sold will be priced at or below a lower quartile level. According to the Land Registry, in Coventry-Warwickshire there were a total of 11,817 resales (i.e. excluding newly-built homes) in the last year (year to March 2022) and therefore around 2,954 would be priced below the lower quartile. This is 2,954 homes that would potentially be affordable to the target group for affordable home ownership products and is a potential supply that is well in excess of the level of need calculated.
- 8.94 It is then possible to provide a best estimate of the supply of lower quartile homes that are bought by the target group of households (assumed to be first-time buyers). Whilst dated, a report by Bramley and Wilcox in 2010 (Evaluating requirements for market and affordable housing) noted that around

40% of first-time buyers with a mortgage buy at or below the lower quartile¹⁹. Other recent data suggests that first time buyers account for around half of home purchase loans²⁰ with a total of around 65% of all homes being bought with a loan (35% as cash buyers²¹).

8.95 Bringing this together would point to 32.5% of homes being bought by first-time buyers and around 13% of all homes being a lower quartile home bought by a first-time buyer (32.5% * 40%) – this would point to around half of all lower quartile sales as being to first-time buyers (as half of 25% is 12.5%). Therefore, for the purposes of estimating a ‘need’, half of all lower quartile sales are included in the supply.

8.96 We can therefore now provide three supply estimates which can be considered in the context of the estimated need. These are:

- Only count the supply from affordable home ownership resales (140 per annum);
- Include the supply from affordable home ownership and half of resales of lower quartile homes (1,617 per annum (1,477+140)); and
- Include the supply from affordable home ownership and all resales of lower quartile homes (3,095 per annum (2,955+140)).

8.97 The table below shows the estimated net need from applying these three supply scenarios. Only including the resales of AHO shows a need for 2,086 dwellings per annum and this reduces to a need for 609 per annum if 50% of lower quartile sales are included. If all lower quartile sales are included in the supply, then there is a substantial surplus of affordable home ownership shown. Overall, the analysis shows it is difficult to conclude what the need for affordable home ownership is (and indeed if there is one).

¹⁹ https://thinkhouse.org.uk/site/assets/files/1614/2010_20nhpau_202.pdf

²⁰ <https://www.mortgagesolutions.co.uk/news/2022/01/24/first-time-buyer-numbers-rose-to-nearly-410000-in-2021/#:~:text=First%2Dtime%20buyers%20accounted%20for,39%20per%20cent%20in%202009>

²¹ <https://www.ft.com/content/e0ad2830-094f-4e61-aaa-d77457e2edbb>

Table 8.26 Estimated Need for Affordable Home Ownership (per annum)

	AHO resales only	AHO resales plus 50% of LQ sales	AHO resales plus 100% of LQ sales
Total gross need	2,226	2,226	2,226
LCHO supply	140	1,617	3,095
Net need	2,086	609	-869

Source: Range of sources

- 8.98 Focussing on the middle of the three scenarios above (50% of lower quartile sales) the table below shows a need for affordable home ownership in all areas apart from Nuneaton & Bedworth (where the analysis suggests a broad balance between need and supply). It should be noted that the areas where the need for AHO is highest (notably Warwick and Stratford-on-Avon) also show a high need for rented affordable housing. Given the earnings and house price profile this is logical. Icen consider that this 'middle scenario' should be used in drawing conclusions.

Table 8.27 Estimated Need for Affordable Home Ownership by sub-area (per annum)

	Total Gross Need	Supply	Net need
Coventry	633	484	149
North Warwickshire	120	118	2
Nuneaton & Bedworth	214	230	-16
Rugby	296	208	88
Stratford-on-Avon	410	281	129
Warwick	553	296	258
Warwickshire	1,593	1,133	460
Coventry-Warwickshire	2,226	1,617	609

Source: Range of sources as discussed

Implications of the Analysis

- 8.99 Given the analysis above, it would be reasonable to conclude that there is a need to provide housing under the definition of 'affordable home ownership' – although this conclusion is based on only considering supply from resales of low cost home ownership and some resales of existing homes in the market. If supply estimates are expanded to include all market housing for sale below a lower quartile price then the need for AHO is less clear-cut.
- 8.100 Regardless, it does seem that there are many households in Coventry & Warwickshire who are being excluded from the owner-occupied sector. This can be seen by analysis of tenure change, which saw the number of households living in private rented accommodation increasing by 101% from 2001 to 2011 (with the likelihood that there have been further increases since). Over the same period, the number of owners with a mortgage dropped by 11%. That said, some households will choose to

privately rent, for example as it is a more flexible option that may be more suitable for a particular household's life stage (e.g. if moving locations with employment).

Table 8.28 Change in number of owner-occupiers with a mortgage and number of households in the private rented sector (2001-11)

	Owners with a mortgage				Private rented			
	2001	2011	Change	% change	2001	2011	Change	% change
Coventry	46,687	40,236	-6,451	-13.8%	12,429	26,503	14,074	113.2%
N Warwks	11,150	9,679	-1,471	-13.2%	1,779	2,913	1,134	63.7%
N & B	22,347	20,072	-2,275	-10.2%	2,808	6,683	3,875	138.0%
Rugby	16,077	15,314	-763	-4.7%	2,511	5,903	3,392	135.1%
SoA	18,913	16,989	-1,924	-10.2%	4,264	6,596	2,332	54.7%
Warwick	22,215	19,954	-2,261	-10.2%	5,599	10,513	4,914	87.8%
Warwickshire	90,702	82,008	-8,694	-9.6%	16,961	32,608	15,647	92.3%
C & W	137,389	122,244	-15,145	-11.0%	29,390	59,111	29,721	101.1%

Source: Census (2001 and 2011)

- 8.101 On this basis, and as previously noted, it seems likely in Coventry & Warwickshire that access to owner-occupation is being restricted by access to capital (e.g. for deposits, stamp duty, legal costs) as well as potentially some mortgage restrictions (e.g. where employment is temporary) rather than just being due to the cost of housing to buy.
- 8.102 The NPPF gives a clear direction that 10% of all new housing (on larger sites) should be for affordable home ownership (in other words, if 20% of homes were to be affordable then half would be affordable home ownership) and it is now the case that policy-compliant planning applications would be expected to deliver a minimum of 25% affordable housing as First Homes (as a proportion of the total affordable housing), with Councils being able to specify the requirement for any remaining affordable housing (subject to at least 10% of all housing being for AHO).
- 8.103 Whilst there are clearly many households in the gap between renting and buying, they in some cases will be able to afford homes below lower quartile housing costs. That said, it is important to recognise that some households will have insufficient savings to be able to afford to buy a home on the open market (particularly in terms of the ability to afford a deposit) and low-cost home ownership homes – and shared ownership homes in particular – will therefore continue to play a role in supporting some households in this respect.
- 8.104 The evidence points to a clear and acute need for rented affordable housing for lower income households, and it is important that a supply of rented affordable housing is maintained to meet the needs of this group including those to which the authorities have a statutory housing duty. Such housing is notably cheaper than that available in the open market and can be accessed by many

more households (some of whom may be supported by benefit payments).

- 8.105 There will also be a role for AHO on any 100% affordable housing schemes that may come forward (as well as through Section 106). Including a mix of both rented and intermediate homes to buy would make such schemes more viable, as well as enabling a range of tenures and therefore potential client groups to access housing.
- 8.106 In addition, it should also be noted that the finding of a 'need' for affordable home ownership does not have any impact on the overall need for housing. It seems clear that this group of households is simply a case of seeking to move households from one tenure to another (in this case from private renting to owner-occupation); there is therefore no net change in the total number of households, or the number of homes required.

How Much Should Affordable Home Ownership Homes Cost?

- 8.107 The analysis and discussion above suggest that there are a number of households likely to fall under the PPG definition of needing affordable home ownership (including First Homes) – i.e. in the gap between renting and buying – but that the potential supply of low-cost housing to buy makes it difficult to fully quantify this need. However, given the NPPF, the Councils are likely to need to consider some additional homes on larger sites as some form of affordable home ownership (AHO).
- 8.108 The analysis below focusses on the cost of discounted market sale (which would include First Homes) to make them genuinely affordable before moving on to consider shared ownership (in this case suggestions are made about the equity shares likely to be affordable and whether these shares are likely to be offered). It is considered that First Homes and shared ownership are likely to be the main affordable home ownership tenures moving forward although it is accepted that some delivery may be of other products. This section also provides some comments about Rent to Buy housing.
- 8.109 The reason for the analysis to follow is that it will be important for the Councils to ensure that any affordable home ownership is sold at a price that is genuinely affordable for the intended target group – for example there is no point in discounting a new market home by 30% if the price still remains above that for which a reasonable home can already be bought in the open market.

Discounted Market Sales Housing (focussing on First Homes)

- 8.110 In May 2021, MHCLG published a new Planning Practice Guidance (PPG) regarding First Homes. The key parts of this guidance are set out below:

First Homes are a specific kind of discounted market sale housing and should be considered to meet the definition of 'affordable housing' for planning purposes. Specifically, First Homes are discounted market sale units which:

- a) must be discounted by a minimum of 30% against the market value;*
- b) are sold to a person or persons meeting the First Homes eligibility criteria (see below);*
- c) on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and,*
- d) after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London).*

First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations.

- 8.111 In terms of eligibility criteria, a purchaser should be a first-time buyer with a combined annual household income not exceeding £80,000 (or £90,000 in Greater London) and a mortgage needs to fund a minimum of 50% of the discounted purchase price. Local authorities can set their own eligibility criteria, which could for example involve lower income caps, a local connection test, or criteria based on employment status. Regarding discounts, a First Home must be sold at least 30% below the open market value. However, local authorities do have the discretion to require a higher minimum discount of either 40% or 50% (if they can demonstrate a need for this).
- 8.112 As noted above, the problem with having a percentage discount is that it is possible in some locations or types of property that such a discount still means that the discounted housing is more expensive than that typically available in the open market. This is often the case as new build housing itself attracts a premium. The preferred approach in this report is to set out a series of purchase costs for different sizes of accommodation which ensure these products are affordable for the intended group. These purchase costs are based on current lower quartile rental prices and also consideration of the income required to access the private rented sector and then estimating what property price this level of income might support (assuming a 10% deposit and a 4.5 times mortgage multiple). Below is an example of a calculation based on a 2-bedroom home in Coventry:
- Previous analysis has shown that the lower quartile rent for a 2-bedroom home in Coventry is £650 per month;
 - On the basis of a household spending no more than 30% of their income on housing, a household would need an income of around £2,170 per month to afford (£650/0.30) or £26,000 per annum; and

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- 8.113 With an income of £26,000, it is estimated that a household could afford to buy a home for around £130,000. This is based on assuming a 10% deposit (mortgage for 90% of value) and a four and a half times mortgage multiple – calculated as $£26,000 \times 4.5 / 0.9$.
- 8.114 Therefore, £130,000 is a suggested purchase price to make First Homes/discounted home ownership affordable for households in the rent/buy gap in Coventry. This figure is essentially the equivalent price that is affordable to a household who can just afford to rent privately. In reality, there will be a range of incomes in the rent/buy gap and so some households could afford a higher price; however, setting all homes at a higher price would mean that some households will still be unable to afford.
- 8.115 On this basis, it is considered reasonable to look at the cost of First Homes as a range, from the equivalent private rent figure up to a midpoint of the cost of open market purchase and the relevant private rented figure (for a 2-bedroom home the lower quartile price is this is £140,000, giving a midpoint of £135,000). The use of a midpoint would mean that only around half of households in the rent/buy gap could afford, and therefore any housing provided at such a cost would need to also be supplemented by an equivalent number at a lower cost (which might include other tenures such as shared ownership).
- 8.116 The tables below therefore set out a suggested purchase price for affordable home ownership/First Homes in each area. The tables also show an estimated OMV and the level of discount likely to be required to achieve affordability. The OMV is based on taking the estimated lower quartile price by size and adding 15% (which is the typically newbuild premium seen nationally). It should be noted that the discounts are based on the OMV as estimated, in reality the OMV might be quite different for specific schemes and therefore the percentage discount would not be applicable. For example, if the OMV for a 2-bedroom home in Coventry were to actually be £200,000 (rather than the modelled £161,000) then the discount would be in the range of 33% and 35%.
- 8.117 On the basis of the specific assumptions used, the analysis points to a discount of around 30% for 2-bedroom homes and a figure of around 40% for larger (3+-bedroom) properties. Given that a single discount figure is likely to be needed for plan making purposes it is suggested that a 30% discount is reasonable, with the expectation that most First Homes will particularly be 2-bedroom properties. Given there is a cap of £250,000 on the purchase price, it seems unlikely that 4+-bedroom homes could be provided as First Homes in some locations (notably Stratford-on-Avon and Warwick).

Table 8.29 Affordable home ownership prices – data for year to March 2022 – Coventry

	Affordable Price	Estimated newbuild OMV	Discount required
1-bedroom	£102,500	£111,550	8%
2-bedrooms	£130,000-£135,000	£161,000	16%-19%
3-bedrooms	£150,000-£176,000	£232,300	24%-35%
4+-bedrooms	£200,000-£232,000	£303,600	24%-34%

Source: Derived from a range of sources

Table 8.30 Affordable home ownership prices – data for year to March 2022 – North Warwickshire

	Affordable Price	Estimated newbuild OMV	Discount required
1-bedroom	-	-	-
2-bedrooms	£120,000-£130,500	£162,150	20%-26%
3-bedrooms	£139,000-£167,500	£225,400	26%-38%
4+-bedrooms	£190,000-£249,500	£355,350	30%-47%

Source: Derived from a range of sources

Table 8.31 Affordable home ownership prices – data for year to March 2022 – Nuneaton & Bedworth

	Affordable Price	Estimated newbuild OMV	Discount required
1-bedroom	£90,000-£93,500	£111,550	16%-19%
2-bedrooms	£115,000-£122,500	£149,500	18%-23%
3-bedrooms	£130,000-£159,500	£217,350	27%-40%
4+-bedrooms	£179,000-£233,000	£330,050	29%-46%

Source: Derived from a range of sources

Table 8.32 Affordable home ownership prices – data for year to March 2022 – Rugby

	Affordable Price	Estimated newbuild OMV	Discount required
1-bedroom	£110,000-£113,000	£133,400	15%-18%
2-bedrooms	£132,000-£141,000	£172,500	18%-23%
3-bedrooms	£159,000-£198,000	£272,550	27%-42%
4+-bedrooms	£211,000-£292,000	£428,950	32%-51%

Source: Derived from a range of sources

Table 8.33 Affordable home ownership prices – data for year to March 2022 – Stratford-on-Avon

	Affordable Price	Estimated newbuild OMV	Discount required
1-bedroom	£125,000-£134,500	£165,600	19%-25%
2-bedrooms	£149,000-£175,000	£231,150	24%-36%
3-bedrooms	£179,000-£228,000	£318,550	28%-44%
4+-bedrooms	£240,000-£336,000	£496,800	32%-52%

Source: Derived from a range of sources

Table 8.34 Affordable home ownership prices – data for year to March 2022 – Warwick

	Affordable Price	Estimated newbuild OMV	Discount required
1-bedroom	£130,000-£140,000	£172,500	19%-25%
2-bedrooms	£157,000-£180,500	£234,600	23%-33%
3-bedrooms	£185,000-£240,500	£340,400	29%-46%
4+-bedrooms	£250,000-£344,000	£503,700	32%-50%

Source: Derived from a range of sources

- 8.118 It should also be noted that the analysis above is for the whole of each local authority area; the pricing of housing does vary across the local authorities and therefore some small adjustments to the figures might be appropriate in some instances. That said, affordable needs can be met anywhere in the authorities (where opportunities arise) and so using an expectation of an authority-wide affordability calculation should ensure affordable products on sites regardless of location.

Shared Ownership

- 8.119 Whilst the Government has a clear focus on First Homes, they also see a continued role for Shared Ownership, launching a 'New Model for Shared Ownership' in early 2021 (following a 2020 consultation) – this includes a number of proposals, with the main one for the purposes of this assessment being the reduction of the minimum initial share from 25% to 10%. A key advantage of shared ownership over other tenures is that a lower deposit is likely to be required than for full or discounted purchase. Additionally, the rental part of the cost will be subsidised by a Registered Provider and therefore keeps monthly outgoings down.
- 8.120 For the purposes of the analysis in this report it is considered that for shared ownership to be affordable, total outgoings should not exceed that needed to rent privately.
- 8.121 Because shared ownership is based on buying part of a property, it is the case that the sale will need to be at open market value. Where there is a large gap between the typical incomes required to buy or rent, it may be the case that lower equity shares are needed for homes to be affordable (at the

level of renting privately). The analysis below therefore seeks to estimate the typical equity share that might be affordable for different sizes of property with any share lower than 10% likely to be unavailable. The key assumptions used in the analysis are:

- OMV at LQ price plus 15% (reflecting likelihood that newbuild homes will have a premium attached and that they may well be priced above a LQ level) – it should be noted that this is an assumption for modelling purposes and consideration will need to be given to the OMV of any specific product;
- 10% deposit on the equity share;
- Rent at 2.75% pa on unsold equity;
- Repayment mortgage over 25-years at 4%;
- Service charge of £100 per month for flatted development (assumed to be 1- and 2-bedroom homes); and
- It is also assumed that shared ownership would be priced for households sitting towards the bottom end of the rent/buy gap and so the calculations assume that total outgoings should be no higher than the equivalent private rent (lower quartile) cost for that size of property;

8.122 The tables below show that to make shared ownership affordable, equity shares in the region of 35%-50% could work for some sizes of home in some locations, however, much lower shares are likely to be needed to make homes affordable for most dwelling sizes/locations. Overall, it is suggested that equity shares in the range of 20%-35% should be considered but that it will be important to make sure the actual cost to the household is genuinely affordable in a local context.

8.123 It should also be noted that the analysis below is predicated on a particular set of assumptions (notably about likely OMV). In reality costs do vary across the area and will vary from site to site. Therefore, this analysis should be seen as indicative with specific schemes being tested individually to determine if the product being offered is genuinely (or reasonably) affordable.

Table 8.35 Estimated Affordable Equity Share by Size – Coventry

	1-bedroom	2-bedrooms	3-bedrooms	4-bedrooms
OMV	£111,550	£161,000	£232,300	£303,600
Share	67%	46%	38%	41%
Equity Bought	£74,739	£73,738	£88,274	£123,565
Mortgage Needed	£67,265	£66,364	£79,447	£111,209
Monthly Cost of Mortgage	£355	£350	£419	£587
Retained Equity	£36,812	£87,262	£144,026	£180,035
Monthly Rent on Retained Equity	£84	£200	£330	£413
Service Charge per month	£100	£100	£0	£0
Total Cost per month	£540	£650	£750	£1,000

Source: Data based on Housing Market Cost Analysis

Table 8.36 Estimated Affordable Equity Share by Size – North Warwickshire

	1-bedroom	2-bedrooms	3-bedrooms	4-bedrooms
OMV	-	£162,150	£225,400	£355,350
Share	-	32%	32%	16%
Equity Bought	-	£52,212	£72,579	£55,257
Mortgage Needed	-	£46,991	£65,321	£49,731
Monthly Cost of Mortgage	-	£248	£345	£263
Retained Equity	-	£109,938	£152,821	£300,093
Monthly Rent on Retained Equity	-	£252	£350	£688
Service Charge per month	-	£100	£0	£0
Total Cost per month	-	£600	£695	£950

Source: Data based on Housing Market Cost Analysis

Table 8.37 Estimated Affordable Equity Share by Size – Nuneaton & Bedworth

	1-bedroom	2-bedrooms	3-bedrooms	4-bedrooms
OMV	£111,550	£149,500	£217,350	£330,050
Share	34%	36%	28%	17%
Equity Bought	£38,262	£53,820	£61,727	£56,439
Mortgage Needed	£34,435	£48,438	£55,555	£50,795
Monthly Cost of Mortgage	£182	£256	£293	£268
Retained Equity	£73,288	£95,680	£155,623	£273,611
Monthly Rent on Retained Equity	£168	£219	£357	£627
Service Charge per month	£100	£100	£0	£0
Total Cost per month	£450	£575	£650	£895

Source: Data based on Housing Market Cost Analysis

Table 8.38 Estimated Affordable Equity Share by Size – Rugby

	1-bedroom	2-bedrooms	3-bedrooms	4-bedrooms
OMV	£133,400	£172,500	£272,550	£428,950
Share	44%	39%	25%	7%
Equity Bought	£58,696	£66,930	£69,228	£29,169
Mortgage Needed	£52,826	£60,237	£62,305	£26,252
Monthly Cost of Mortgage	£279	£318	£329	£139
Retained Equity	£74,704	£105,570	£203,322	£399,781
Monthly Rent on Retained Equity	£171	£242	£466	£916
Service Charge per month	£100	£100	£0	£0
Total Cost per month	£550	£660	£795	£1,055

Source: Data based on Housing Market Cost Analysis

Table 8.39 Estimated Affordable Equity Share by Size – Stratford-on-Avon

	1-bedroom	2-bedrooms	3-bedrooms	4-bedrooms
OMV	£165,600	£231,150	£318,550	£496,800
Share	36%	20%	21%	5%
Equity Bought	£58,954	£46,923	£66,896	£24,840
Mortgage Needed	£53,058	£42,231	£60,206	£22,356
Monthly Cost of Mortgage	£280	£223	£318	£118
Retained Equity	£106,646	£184,227	£251,655	£471,960
Monthly Rent on Retained Equity	£244	£422	£577	£1,082
Service Charge per month	£100	£100	£0	£0
Total Cost per month	£625	£745	£895	£1,200

Source: Data based on Housing Market Cost Analysis

Table 8.40 Estimated Affordable Equity Share by Size – Warwick

	1-bedroom	2-bedrooms	3-bedrooms	4-bedrooms
OMV	£172,500	£234,600	£340,400	£503,700
Share	36%	26%	17%	8%
Equity Bought	£62,790	£60,058	£58,889	£38,785
Mortgage Needed	£56,511	£54,052	£53,000	£34,906
Monthly Cost of Mortgage	£298	£285	£280	£184
Retained Equity	£109,710	£174,542	£281,511	£464,915
Monthly Rent on Retained Equity	£251	£400	£645	£1,065
Service Charge per month	£100	£100	£0	£0
Total Cost per month	£650	£785	£925	£1,250

Source: Data based on Housing Market Cost Analysis

- 8.124 In policy terms, whilst the analysis has provided an indication of the equity shares possibly required by size, the key figure is actually the total cost per month (and how this compares with the costs to access private rented housing). For example, whilst the tables suggest a 50% equity share for 2-

bedroom home in Coventry, this is based on a specific set of assumptions. Were a scheme to come forward with a 25% share, but a total cost in excess of £650 per month, then it would be clear that a lower share is likely to be required to make the home genuinely affordable. Hence the actual share can only be calculated on a scheme-by-scheme basis. Any policy position should seek to ensure that outgoings are no more than can reasonably be achieved in the private rented sector, rather than seeking a specific equity share.

Rent to Buy

- 8.125 A further affordable option is Rent to Buy; this is a government scheme designed to ease the transition from renting to buying the same home. Initially (typically five years) the newly built home will be provided at the equivalent of an affordable rent (approximately 20% below the market rate). The expectation is that the discount provided in that first five years is saved in order to put towards a deposit on the purchase of the same property. Rent to Buy can be advantageous for some households as it allows for a smaller 'step' to be taken on to the home ownership ladder.
- 8.126 At the end of the five-year period, depending on the scheme, the property is either sold as a shared ownership product or to be purchased outright as a full market property. If the occupant is not able to do either of these then the property is vacated.
- 8.127 In order to access this tenure it effectively requires the same income threshold for the initial phase as a market rental property although the cost of accommodation will be that of affordable rent. The lower than market rent will allow the household to save for a deposit for the eventual shared ownership or market property. In considering the affordability of rent-to-buy schemes there is a direct read across to the income required to access affordable home ownership (including shared ownership), it should therefore be treated as part of the affordable home ownership products suggested by the NPPF.

Essential Local Workers

- 8.128 Annex 2 of the NPPF also includes the needs of essential local workers 'Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provided a subsidised route to home ownership and/or is for essential local workers' [emphasis added]. Essential local workers are defined as 'Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers'.
- 8.129 To give an indication of the number of essential workers in Coventry & Warwickshire analysis has been undertaken looking at Standard Industrial Classification 2007 (SIC) categories – this shows

employment sectors based on industry, and for the purposes of this analysis the public administration, education and health industries have been used to represent 'essential workers'. The analysis shows that around 29% of resident workers are considered 'essential workers' in Coventry, with a slightly lower figure of 26% in Warwickshire – these figures are similar to those seen regionally and nationally (both at 28%).

Table 8.41 Number and proportion of essential workers in a range of areas

	Coventry		Warwickshire		West Mid-lands	England
	Resident workers	% of workers	Resident workers	% of workers	% of workers	% of workers
Agriculture, energy and water	2,494	1.8%	7,788	2.8%	2.6%	2.3%
Manufacturing	15,971	11.6%	31,899	11.6%	12.3%	8.9%
Construction	7,478	5.4%	18,279	6.7%	7.5%	7.7%
Distribution, hotels and restaurants	31,953	23.1%	61,104	22.3%	22.3%	21.5%
Transport and communication	13,483	9.8%	26,813	9.8%	8.1%	9.1%
Financial, Real Estate, Professional & Administration	20,383	14.8%	43,300	15.8%	14.3%	17.5%
Public administration, education and health	40,056	29.0%	71,524	26.1%	28.4%	28.2%
Other	6,324	4.6%	13,289	4.9%	4.5%	5.0%
All industries	138,142	100.0%	273,996	100.0%	100.0%	100.0%

Source: 2011 Census

8.130 The table below shows how the number of essential workers varies across local authorities. Generally, the authorities have similar proportions of essential workers, with the main notable differences being a slightly lower proportion in North Warwickshire and Stratford-on-Avon.

Table 8.42 Number and proportion of essential workers – local authorities

	Resident essential workers	% of workers in area	% of resident workers
Coventry	40,056	29.0%	35.9%
North Warwickshire	7,378	23.5%	6.6%
Nuneaton & Bedworth	16,082	26.6%	14.4%
Rugby	13,239	26.1%	11.9%
Stratford-on-Avon	14,321	23.3%	12.8%
Warwick	20,504	29.3%	18.4%
Warwickshire	71,524	26.1%	64.1%
C & W	111,580	27.1%	100.0%

Source: 2011 Census

8.131 The 2011 Census also enables analysis to be conducted as to the tenure of workers by industry. It can be seen that essential workers see a fairly average profile, with similar levels of owner-

occupation, social renting and private renting as is seen across each individual authority (Coventry and Warwickshire).

Table 8.43 Housing tenure by industry of employment (2011) – Coventry

	Owner-occupied	Social rented	Private rented
Agriculture, energy and water	70%	8%	22%
Manufacturing	77%	7%	16%
Construction	76%	8%	16%
Distribution, hotels and restaurants	57%	14%	29%
Transport and communication	66%	10%	24%
Financial, Real Estate, Professional and Administration	67%	10%	23%
Public administration, education and health	68%	11%	21%
Other	57%	13%	30%
All industries	67%	11%	23%

Source: 2011 Census

Table 8.44 Housing tenure by industry of employment (2011) – Warwickshire

	Owner-occupied	Social rented	Private rented
Agriculture, energy and water	74%	8%	18%
Manufacturing	80%	7%	13%
Construction	78%	8%	14%
Distribution, hotels and restaurants	65%	13%	22%
Transport and communication	72%	8%	20%
Financial, Real Estate, Professional and Administration	76%	6%	17%
Public administration, education and health	74%	9%	17%
Other	64%	10%	26%
All industries	73%	9%	18%

Source: 2011 Census

- 8.132 It is also possible to consider the affordability of housing for essential workers by considering local salaries. An online assessment of local jobs (across Coventry & Warwickshire) for nurses, firefighters, teachers, police officers and childcare was undertaken in August 2022. This showed a range of salaries, but typically in the range of about £20,000 to £30,000 per annum. The average salary was around £25,000 although it does need to be noted that there are a variety of roles with a range of salaries in these professions depending on level of expertise and experience.
- 8.133 With a salary of £25,000, an individual might be able to buy a home for around £125,000 (based on a 10% deposit and 4.5 times mortgage multiple) and with two salaries at this level would be able to afford around £250,000. This latter figure would allow the household to afford to buy a home across much of the study area, but the single income would make home ownership difficult (particularly in

higher value locations), and this population could be a potential target for affordable home ownership products.

- 8.134 Overall, the analysis does not point towards there being a particular and specific need for affordable housing for essential workers. Such workers make up a similar part of the workforce as is the case in many areas and households are as likely to be owner-occupiers than many other industry groups. However, on the basis of local incomes (notably for single income essential workers), access to the owner-occupied sector may be restricted by income and it may be appropriate to consider whether or not some affordable properties should be set aside for essential local workers.

Summary of Affordable Housing Need

- 8.135 The table below brings together the estimates of annual need for rented affordable housing and affordable home ownership to consider the balance between tenures in different areas. This table should be considered for reference purposes and will not directly inform decisions about an appropriate mix for any individual area – that will in part be informed by viability and also any local priorities such as to maximise provision of rented accommodation as that is likely to be required by households with the most acute needs.

- 8.136 When looking at rented needs, the analysis suggests a need for 3,833 affordable homes per annum across the whole study area, with a need shown for all individual local authorities; the Councils are therefore justified in seeking to secure additional affordable housing.

Table 8.45 Estimated annual need for affordable housing split between rented and affordable home ownership – Coventry & Warwickshire

	Rented affordable need	Affordable home ownership need	Total annual need	% as AHO
Coventry	1,887	149	2,035	7%
North Warwks	131	2	133	1%
N & B	407	-16	391	-4%
Rugby	407	88	495	18%
SoA	419	129	547	24%
Warwick	582	258	839	31%
Warwickshire	1,946	460	2,406	19%
C & W	3,833	609	4,441	14%

Source: Draws from earlier analysis

- 8.137 The analysis suggests that there will be a need for both social and affordable rented housing – the latter will be suitable particularly for households who are close to being able to afford to rent privately and also for some households who claim full Housing Benefit. On this basis, it is not recommended

that the Councils have a rigid policy for the split between social and affordable rented housing, although the analysis is clear that both tenures of homes are likely to be required.

- 8.138 When looking at the need for AHO products, the analysis also suggests a need across the study area, albeit (at 609 per annum) the need is lower than for rented housing. In interpreting this figure, it should however be noted that there could be additional supply from resales of market homes (below a lower quartile price) which arguably would mean there is a much more limited need for AHO.
- 8.139 Analysis does suggest that there are many households in Coventry & Warwickshire who are being excluded from the owner-occupied sector (as evidenced by reductions in owners with a mortgage and increases in the size of the private rented sector). This suggests that a key issue in the study area is about access to capital (e.g. for deposits, stamp duty, legal costs) as well as potentially mortgage restrictions (e.g. where employment is temporary) rather than simply the cost of housing to buy.
- 8.140 The study also considers different types of AHO (notably First Homes and shared ownership) as each will have a role to play – shared ownership is likely to be suitable for households with more marginal affordability (those only just able to afford to privately rent) as it has the advantage of a lower deposit and subsidised rent.
- 8.141 In deciding what types of affordable housing to provide, including a split between rented and home ownership products, the Councils will need to consider the relative levels of need and also viability issues (recognising for example that providing AHO may be more viable and may therefore allow more units to be delivered, but at the same time noting that households with a need for rented housing are likely to have more acute needs and fewer housing options).
- 8.142 Overall, the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the area. It does however need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise.

PART C: CONSIDERING EMPLOYMENT LAND NEEDS

9. EMPLOYMENT LAND NEEDS

9.1 This section moves on to consider the need for employment land across Coventry and Warwickshire looking to 2041 and 2050.

National Planning Policy and Guidance

9.2 The NPPF sets out that planning policies and decisions should help create the conditions in which businesses can invest, expand and grow. It outlines that significant weight should be placed on the need to support economic growth and productivity (Para 81). Through the plan-making process, local planning authorities (LPAs) need to set out an economic vision and strategy which positively and proactively encourages sustainable economic growth having regard to Local Industrial Strategies and other policies for economic development and regeneration; and to set criteria for, or identify strategic sites, for local and inward investment (Para 82).

9.3 Para 83 in the NPPF states that planning policies and decisions should recognise and address the specific locational requirements of different sectors or clusters, including knowledge or data-driven sectors, create or high-tech industries, and for storage and distribution at a variety of scales and at suitably accessible locations. Para 85 recognises that in rural areas, sites to meet local business and community needs may be adjacent to or beyond existing settlements and in locations which are not well served by public transport.

9.4 Planning Practice Guidance (PPG) on *Housing and economic needs assessment* requires policy-making authorities to prepare (and keep under review) evidence to understand business needs and encourages such assessments to be undertaken across Functional Economic Market Areas (FEMA) which in this case relates to the Coventry and Warwickshire sub-region.

9.5 In assessing future needs, PPG Para 2a-027 outlines a number of different techniques:

- sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand)
- demographically derived assessments of current and future local labour supply (labour supply techniques)
- analysis based on the past take-up of employment land and property and/or future property market requirements

-
- consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models, particularly those which make use of online platforms to respond to consumer demand and monitoring of business, economic and employment statistics.
- 9.6 Icení has had regard to these different approaches in preparing the HEDNA. Icení's approach has been to consider and triangulate different methodologies and evidence in drawing conclusions on future employment floorspace and land needs.
- 9.7 Different forecasting techniques have their advantages and disadvantages. Econometric forecasts take account of differences in expected economic performance moving forward relative to the past. However, a detailed model is required to relate net forecasts to use classes and estimate gross floorspace and land requirements.
- 9.8 For office-based sectors consideration needs to be given to the impacts of trends in home working (and growth in hybrid working whereby workers spend part of the working week at home). For industrial sectors however the relationship between floorspace needs and employment trends may be weak – influenced by productivity improvements. In contrast, past take-up is based on actual delivery of employment development; but does not take account of implications of growth in labour supply or housing growth nor any differences in economic performance relative to the past. It is also potentially influenced by past land supply and/or planning policies.
- 9.9 Ultimately therefore an appropriate approach is therefore to utilise a range of different forecasting techniques alongside local intelligence and an understanding of the merits of different approaches in drawing conclusions. This approach of triangulating different approaches and testing findings, which Icení adopts, is consistent with the PPG.
- 9.10 PPG Para 2a-031 specifically addresses how to assess need and allocate land for logistics. The logistics/ distribution sector is an important component of the sub-regional economy and the sub-region has a competitive advantage in this sector reflecting its location at the centre of the country and motorway network. Para 2a-031 outlines that:

“The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).

Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to

appropriately skilled local labour. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas.”

- 9.11 The PPG encourages analysis of market signals, including the take-up and availability of land; analysis of economic forecasts to identify potential changes in demand; and engagement – including with LEPs, logistics developers and occupiers in assessing demand. It is clear that LPAs will then need to consider the most appropriate locations for meeting identified needs (whether through the expansion of existing sites or development of new ones).
- 9.12 The need for strategic distribution and warehousing space are influenced by different factors, including the growth in e-retailing, traffic/ freight growth, the replacement of older warehousing space and economies of scale. A specific forecasting exercise is undertaken for large-scale B8 warehousing units (defined as over 9,000 sq.m / 100,000 s.qft). This has been undertaken by MDS Transmodal working alongside Iceni. It is a tried and tested forecasting approach which informed both the East and West Midlands RSS and has/ is being used in a number of adjoining sub-regional areas including Leicestershire, Nottinghamshire together with the Liverpool City Region.

Labour Demand Model

- 9.13 Using the employment forecasts from CE, Iceni has developed a set of employment floorspace requirements. They relate to the floorspace and land required to accommodate net growth in floorspace. Provision for flexibility of supply and replacement demand is considered later in this Paper.
- 9.14 CE provided a 45 sector breakdown of sectors which we have used to model floorspace needs. Iceni has a standard model which considers how sectors relate to use classes which is used to estimate the proportion of employment in different broad use classes – offices (Eg(i) and E(g)(ii)), industrial (E(g)(iii) and B2) and warehousing (B8). We attribute changes in jobs to use classes first, using BRES data to estimate the sector-specific relationship between net changes in total employment and that for Full-Time Equivalent (FTE) jobs.
- 9.15 A typical home working by sector rate has been applied to discount the needs rates by sector, using 2019 data. A sensitivity is considered using a higher home working rate in the future (as presented later in this section).

9.16 The next stage in the modelling is then to apply employment densities to estimate the net change in floorspace. Employment density assumptions are assumed in relating changes in FTE employment to floorspace.²² These are as follows:

- 14 sqm offices (12 sq.m NIA per FTE)
- 44 sqm industrial (blend of former B1c and B2)
- 80 sqm warehousing

9.17 In the labour demand modelling, warehousing needs relate to both strategic and non-strategic warehousing, the former being 'big box' units of > 9,000 sq.m.

9.18 The table below sets out the FTEs by Use Class change 2021-41.

Table 9.1 FTEs – Net Change 2021-2041 by Use Class

	Offices	Industrial	Warehousing	Other
North Warwickshire	1,600	-400	1,100	4,800
Nuneaton and Bedworth	700	-500	300	3,600
Rugby	1,200	-400	700	4,800
Stratford-on-Avon	1,800	-900	200	7,500
Warwick	4,100	-700	500	6,100
Coventry	4,200	-1,000	900	12,000
Total	13,600	-3,900	3,800	38,800

Source: CE/ Iceni

9.19 Using the density figures about the summary floorspace outputs for the authorities for 2021-41 are as follows:

Table 9.2 Labour Demand – Net Floorspace Needs 2021-2041, sqm

	Offices	Industrial	Warehousing
North Warwickshire	22,800	-16,100	90,600
Nuneaton and Bedworth	10,100	-22,000	23,300
Rugby	16,500	-17,400	58,800
Stratford-on-Avon	25,900	-41,800	17,200
Warwick	56,900	-29,400	41,200
Coventry	58,300	-44,500	71,200
Total	190,400	-171,200	302,300

Source: CE/ Iceni

²² These relate to the Gross External Area ("GEA").

9.20 The equivalent figures over the longer timeframe to 2050 are shown below:

Table 9.3 Labour Demand – Net Floorspace Needs 2021-50, sq.m

	Offices	Industrial	Warehousing
North Warwickshire	31,700	-29,000	126,100
Nuneaton and Bedworth	13,800	-30,900	31,000
Rugby	23,000	-27,200	81,300
Stratford-on-Avon	36,000	-77,000	22,300
Warwick	78,800	-42,100	55,800
Coventry	80,700	-83,500	95,500
Total	263,900	-289,700	411,900

Source: CE/ Icenl

9.21 Office floorspace needs are focused (spatially) on Coventry and Warwick, which are the main office markets in the sub-region; followed by Stratford-on-Avon.

9.22 Industrial floorspace needs are negative in the labour demand model. Warehouse floorspace needs are focused on North Warwickshire, Coventry and Rugby in the centre/north of the sub-region.

9.23 Net floorspace need has been converted to land using standard plot ratios of:

- 0.5 for offices (rising to 1.5 for Coventry reflecting a blended plot ratio including some city centre higher density, such as Friargate and some at business park/ lower densities);
- 0.5 for industrial; and
- 0.4 for warehouse and distribution.

9.24 The plot ratios describe the relationship between the site size and floorspace. Land requirements relate to the net developable area, which will be lower than the total site area as some space is devoted to infrastructure, green space etc.

9.25 The initial outputs for the authorities are as follows:

Table 9.4 Labour Demand – Net Land Needs 2021-2041, ha

	Offices	Industrial	Warehousing
North Warwickshire	4.6	-3.2	22.7
Nuneaton and Bedworth	2.0	-4.4	5.8
Rugby	3.3	-3.5	14.7
Stratford-on-Avon	5.2	-8.4	4.3
Warwick	3.8	-5.9	10.3
Coventry	3.9	-8.9	17.8
Total	22.7	-34.2	75.6

Source: CE/ Icenl

Table 9.5 Labour Demand – Net Land Needs 2021-50, ha

	Offices	Industrial	Warehousing
North Warwickshire	6.3	6.3	31.5
Nuneaton and Bedworth	2.8	2.8	7.7
Rugby	4.6	4.6	20.3
Stratford-on-Avon	7.2	7.2	5.6
Warwick	15.8	15.8	13.9
Coventry	5.4	16.1	23.9
Total	52.8	52.8	103.0

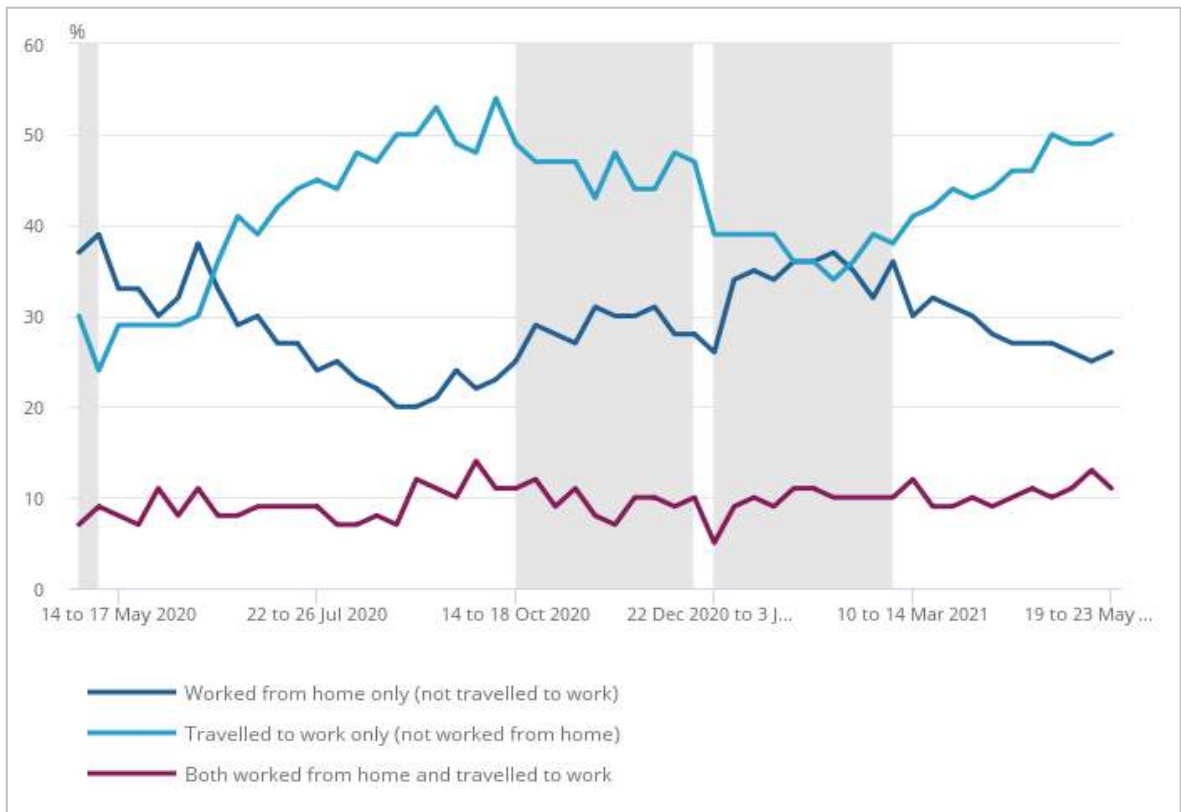
Source: CE/ Icenl

- 9.26 The modelled reduction in industrial floorspace / land needs is however not considered reliable because of the weak relationship between employment trends and future floorspace needs in the manufacturing sector influenced by productivity changes and the need for modern floorspace.

Sensitivity to Changes in Homeworking

- 9.27 Future office space requirements will be influenced by the growth in home working. This has increased in office-based sectors significantly influenced by the Covid-19 pandemic and Government imposed lockdowns and 'work at home' guidance.
- 9.28 The chart below the ONS Opinions and Lifestyle Survey shows the influence of these factors on home working on a month-by-month basis.

Figure 9.1: Proportion of Working Adults working exclusively from Home



Source: ONS Opinions and Lifestyle Survey

9.29 It is somewhat early to identify clearly how this will settle down over time, but it is likely that for office-based activities in particular, the level of home working is likely to remain higher than pre-pandemic and hybrid working (part from home, part in an office) will remain more significant, with potential implications for future office floorspace requirements.

Trends in Home and Hybrid Working

Data on homeworking shows that this has varied spatially over time, with ONS’ analysis showing that this positively correlates with the stringency of Coronavirus restrictions. The latest data shows that between 19-30th Jan 2022, 36% of working adults reported having worked from home at least once in the last 7 days. Our core modelling builds in a proportion of home working of up to 15% by sector, but this is based on the pre-pandemic position and could under-estimate future levels.

It is clear that there are benefits and disbenefits of home working; with offices supporting coloration, social interaction, and staff development. Home working on the other hand can reduce travel time/cost and improve their work/life balance; and may reduce employers’ property costs.

Different businesses are however responding in different ways, and that the situation is evolving (on almost a monthly frequency) making it difficult to predict future requirements for office space.

Many businesses and workers have embraced home and hybrid working patterns. It seems likely therefore that there will be some reduction in office space requirements as a result. The scale of this is difficult to precisely quantify and working patterns are still evolving, and it is somewhat difficult to quantify how businesses may respond in considering future space requirements (with occupancy patterns currently higher for mid-week working days).

- 9.32 A sensitivity model has therefore been developed which reduces the officed based requirements under the circumstance that post pandemic there is a reduced requirement due to home working. This is run at reduction of 30% of the office needs modelled in the initial analysis, as below to provide (alongside the main modelling) a set of parameters for office floorspace needs.

Table 9.6 Labour demand land needs 2021-41, sqm – Office Sensitivity Analysis

	Offices	
	Standard need	Need reduced 30%
North Warwickshire	22,800	16,000
Nuneaton and Bedworth	10,100	7,100
Rugby	16,500	11,600
Stratford-on-Avon	25,900	18,100
Warwick	56,900	39,800
Coventry	58,300	40,800
Total	190,400	133,300

Source: CE/ Icenl

Table 9.7 Labour demand land needs 2021-41, ha – Office Sensitivity Analysis

	Offices	
	Standard need	Need reduced 30%
North Warwickshire	4.6	3.2
Nuneaton and Bedworth	2.0	1.4
Rugby	3.3	2.3
Stratford-on-Avon	5.2	3.6
Warwick	3.8	2.7
Coventry	3.9	2.7
Total	22.7	15.9

Source: CE/ Icenl

- 9.33 The market evidence is of corporate office occupiers downsizing on lease events which is increasing giving credence to the sensitivity analysis. It would be prudent to monitor trends in the coming cycle with regards to the office market to understand how demand manifests in the post pandemic era.

This can then inform development management and the future review of policies in line with a “plan, monitor and manage” approach.

Projection of Floorspace Trends

- 9.34 The second main modelling approach is to project forwards trends in total floorspace. Using data from the VOA, we have derived net change in floorspace trends to model a future trend-based need. This incorporates all units as it is not possible to separate large and small scale industrial units for historic VOA data.
- 9.35 Three periods have been used to derive projections based on an annualised average need on the last 5, 10 and 15 years change (i.e. from three alternate starts to present being 2014/15, 2009/10, 2004/05).
- 9.36 For industrial, the most recent trends see a fast growth in industrial floorspace. However for offices, historic growth has been followed by a period of decline. Recent office trends are likely to have been influenced by Permitted Development Rights which may have had an excessive influence on floorspace losses. The market analysis shows office vacancy rates having fallen from almost 9% in 2012 to 4% in 2020 but have seen some subsequent growth.

Table 9.8 VOA Trend Forecast 2021-41, sqm

	Offices			Industrial		
	5yr	10yr	15yr	5yr	10yr	15yr
North Warwickshire	- 12,000	- 8,000	5,300	1,040,000	680,000	780,000
Nuneaton and Bedworth	- 12,000	- 12,000	9,300	80,000	-100,000	-20,000
Rugby	- 28,000	- 6,000	38,700	540,000	440,000	120,000
Stratford-on-Avon	- 60,000	- 20,000	28,000	180,000	-160,000	20,000
Warwick	-	18,000	52,000	-140,000	-40,000	-60,000
Coventry	- 124,000	- 74,000	- 16,000	260,000	-220,000	-480,000
Total	- 236,000	- 102,000	117,300	1,960,000	600,000	360,000

Source: VOA

Table 9.9 VOA Trend Forecast 2021-50, sqm

	Offices			Industrial		
	5yr	10yr	15yr	5yr	10yr	15yr
North Warwickshire	-17,400	-11,600	7,700	1,508,000	986,000	1,131,000
Nuneaton and Bedworth	-17,400	-17,400	13,500	116,000	-145,000	-29,000
Rugby	-40,600	-8,700	56,100	783,000	638,000	174,000
Stratford-on-Avon	-87,000	-29,000	40,600	261,000	-232,000	29,000
Warwick	0	26,100	75,400	-203,000	-58,000	-87,000
Coventry	-179,800	-107,300	-23,200	377,000	-319,000	-696,000
Total	-342,200	-147,900	170,100	2,842,000	870,000	522,000

Source: VOA

- 9.37 For completeness the sqm floorspace projections above have been converted to a land need on the same plot ratios as previous.

Table 9.10 VOA Trend Forecast, 2021-41, ha

	Offices			Industrial		
	5yr	10yr	15yr	5yr	10yr	15yr
North Warwickshire	-2.4	-1.6	1.1	260	170	195
Nuneaton and Bedworth	-2.4	-2.4	1.9	20	- 25	- 5
Rugby	-5.6	-1.2	7.7	135	110	30
Stratford-on-Avon	-12.0	-4.0	5.6	45	- 40	5
Warwick	-	3.6	10.4	- 35	- 10	- 15
Coventry	-8.3	-4.9	-1.1	65	- 55	- 120
Total	-30.7	-10.5	25.6	490	150	90

Source: VOA

Table 9.11 VOA Trend Forecast, 2021-50, ha

	Offices			Industrial		
	5yr	10yr	15yr	5yr	10yr	15yr
North Warwickshire	-4	-	8	377	247	283
Nuneaton and Bedworth	-8	-4	4	29	- 36	- 7
Rugby	-	4	12	196	160	44
Stratford-on-Avon	-16	-16	-4	65	- 58	7
Warwick	-32	-20	24	- 51	- 15	- 22
Coventry	-144	-48	68	94	- 80	- 174
Total	-204	-84	112	711	218	131

Source: VOA

- 9.38 For the purpose of this exercise, Icen considers the 2010-20 period (last ten years) to be the most appropriate period to consider a future trend from. For industrial modelling, it incorporates a relatively stable period followed by a more recent faster growth period.
- 9.39 The modelled outputs are based on net changes in floorspace. However a considerable amount of development arises from churn within the market, with new space brought forward to replace aged/

functionally redundant floorspace. The figures above on their own are likely to under-estimate future development needs.

9.40 We would note that the spatial distribution of industrial need has been influenced in part by land availability, and in particular would note:

- The influence of the designation of what were Regional Logistics Sites at Hams Hall and Birch Coppice, and subsequent extensions to these sites, on completions in North Warwickshire;
- Constraints on industrial land supply in Coventry, with the major industrial locations being Whitley Business Park/Whitley South and Prologis Keresley where available supply has become increasingly constrained. Major schemes around Coventry – such as Ansty Park and Prologis Ryton – fall within Rugby District;
- A relatively constrained supply position for a number of years in Nuneaton and Bedworth prior to the adoption of the Local Plan in 2019, which released a number of sites from the Green Belt. The supply position in the immediate term can be expected to contribute to stronger completions trends in the short-term.

The implications of past supply trends for industrial land, if it were to be replicated, would see future provision continuing to be concentrated in North Warwickshire. This is particular reflects the designation of Regional Logistics Sites in the RSS within the Borough.

Whilst North Warwickshire remains an attractive location for warehousing and logistics development in particular, there is a case for seeking a broader spread of industrial land provision between the authorities within the sub-region and seeking positive growth in industrial land supply in all parts of the Coventry and Warwickshire sub-region.

9.41 For offices the same 10 year period is also recommended for use but under the caveat that considerable losses have occurred through the PDR process outside of the commercial floorspace market dynamic, which is discussed further below. The influence of PDR means that that limited weight should be attached to the net changes in floorspace based on recent trends in projecting future needs.

9.42 Of note, Coventry has for some years been seeking to bring forward city centre office floorspace, with the Friargate scheme delivering over the period since 2018 having contributed to office floorspace completions following a number of years of very low delivery and losses. The floorspace gain over the 2019-21 period has averaged almost 26,000 sq.ft pa (2,400 sqm). The overall implications are discussed further below.

Completions Trend

- 9.43 In addition to the VOA data, total employment completions have been provided by authorities as below. We have set out a projection of floorspace needs based on trends over this period. This has involved reviewing data provided directly or through AMRs to consider completions 2011/12 to 2019/20 and projecting that forward as an annualised average.
- 9.44 In some instances detail on data has been limited, therefore IcenI has sought to independently verify where possible the completions and their nature through engagement with the Councils. It is also of note that these are gross trends (rather than net completions having regard to losses) – theoretically the VOA data provides an indication of net monitored change.

Table 9.12 Completions Trend Forecast 2021-41, ha (gross)

	Total 2011-19	Average 2011-19	2021-41 need	%E(g)(i)	%B8 (strategic sites, est.)	Net as % gross
North Warwickshire (2011-18)	121.8*	15.2	304.4	2%	83%*	N/A
Nuneaton and Bedworth	21.5	2.4	47.9	5%	19%	91%
Rugby**	133.6	14.8	296.9	6%	53%)	N/A
Stratford-on-Avon	59.8	6.6	132.9			24%
Warwick	20.2	2.2	44.9			N/A
Coventry	91.3	10.1	202.8	23%	19%	N/A
Total	448.2	51.5	1,029.8			

Source: LPA / AMR

*Excluding open storage at Baddesley Colliery for BMW and reduced plot for BMW at Hams Hall

** Inc Coventry's unmet need contributions at Ansty Park and Prologis Ryton

Table 9.13 Completions Trend Forecast 2021-50, ha (gross)

	Total 2011-19	Average 2011-19	2021-50 need	%E(g)(i)	%B8 (strategic sites, est.)	Net as % gross
North Warwickshire (2011-18)	121.8*	15.2	441.4	2%	83%*	N/A
Nuneaton and Bedworth	21.5	2.4	69.4	5%	19%	91%
Rugby**	133.6	14.8	430.5	6%	53%)	N/A
Stratford-on-Avon	59.8	6.6	192.7			24%
Warwick	20.2	2.2	65.2			N/A
Coventry	91.3	10.1	294.1	23%	19%	N/A
Total	448.2	51.5	1,493.2			

Source: LPA / AMR

*Excluding open storage at Baddesley Colliery for BMW and reduced plot for BMW at Hams Hall

** Inc Coventry's unmet need contributions at Ansty Park and Prologis Ryton

-
- 9.45 It is evident that North Warwickshire and Rugby have been key contributors to employment floorspace completions, driven by large units at Hams Hall, Prologis Ryton, Rugby Gateway, Antsy Park and Birch Coppice. Coventry's deliveries are particularly influenced by development south west part of Whitley Business Park (Scimitar Way). Much of the focus of these developments is large scale B8, with B2 at Antsy Park.
- 9.46 Coventry's office floorspace delivery has increased in recent years as Friargate has begun to come forward (2018/19 onwards).

Comparing Trends

- 9.47 The table below (Table 9.15) compares the labour demand models, completion trends and the VOA floorspace trends for the 2021-41 period (completions are only presented in the Ha figures).

Table 9.14 Employment Land Needs 2021-2041, sqm (000s)

	Office		Industrial				Total	
	Labour demand	10yr VOA office	Labour demand ind.	Labour demand w'rhse	Labour demand ind. & w'rhse	10yr VOA ind. & w'rhse	Labour demand	10yr VOA
N. Warwickshire	23	-8	-16	91	75	680	98	680
N. and Bedworth	10	-12	-22	23	1	-100	11	-110
Rugby	17	-6	-17	59	41	440	58	460
Stratford-on-Avon	26	-20	-42	17	-25	-160	1	-240
Warwick	67	18	-29	41	12	-40	79	-140
Coventry	58	-74	-45	71	27	-220	85	-460
Total	190	-102	-171	302	131	600	321	190

Source: VOA / CE/lceni

Table 9.15 Employment Land Needs 2021-2041, ha

	Office		Industrial				Total		Completions		
	Labour demand	10yr VOA office	Labour demand ind.	Labour demand w'rhse	Labour demand ind. & w'rhse	10yr VOA ind. & w'rhse	Labour demand	10yr VOA	B1	All exc. B1a / B8 S	B8 Strategic
N. Warwickshire	4.6	-1.6	-3.2	22.7	19.4	151	24.0	151	6.9	44.9	252.6
N. and Bedworth	2.0	-2.4	-4.4	5.8	1.4	-22	3.4	-26	2.4	36.4	9.1
Rugby*	3.3	-1.2	-3.5	14.7	11.2	98	14.5	102	19.1	120.4	157.4
Stratford-on-Avon	5.2	-4.0	-8.4	4.3	-4.1	-36	1.1	-41.3	/	132.9	/
Warwick	3.8	3.6	-5.9	10.3	4.4	-9	8.2	-29	/	44.9	/
Coventry	3.9	-4.9	-8.9	17.8	8.9	-49	12.8	-97	46.2	118.0	38.5
Total	22.7	-10.5	-34.2	75.6	41.3	133	64.0	49	74.6	497.6	457.6

Source: VOA / CE/lceni

* Inc Coventry's unmet need contributions

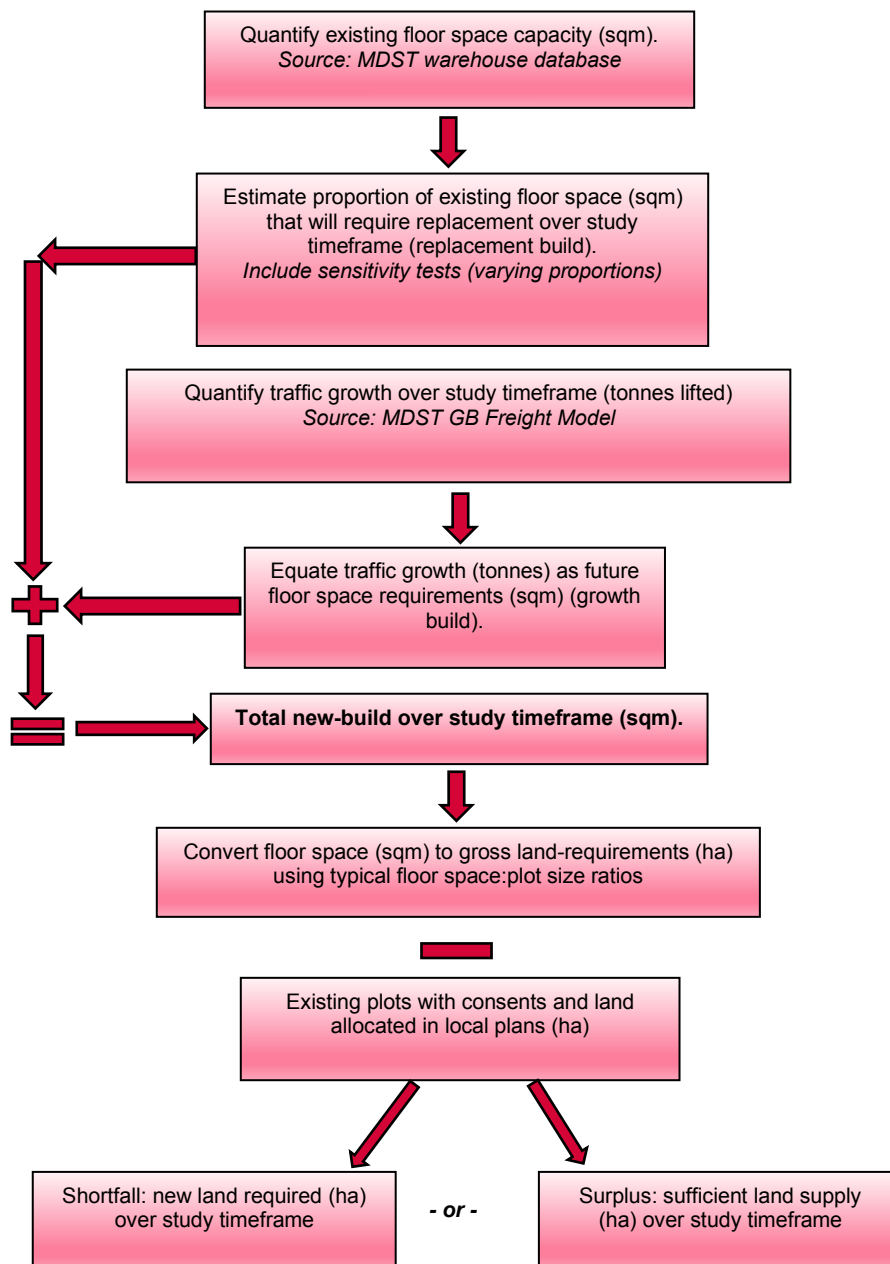
10. STRATEGIC B8 LAND USE FORECASTING

Methodology – Background

- 10.1 Land-use forecasting for other commercial sectors, such as offices or retail, often seeks to relate employment growth to the need for additional floor space, using consistent and robust employment densities. This methodology is potentially unsuitable for the logistics sector for three reasons:
- Warehousing units have a much shorter functional or economic life than other types of commercial property e.g. office buildings. There is a consequent need to develop new units, much of which is needed to replace existing life-expired capacity;
 - There is no consistent or robust employment density ratio that can be applied to the B8 sector. The primary function of warehousing is to handle cargo, meaning that demand for floor space is driven by factors such as cargo type (retail sector), volumes and throughput rates. This in turn dictates then employment requirements (numbers, skills etc..). Grocery retail has high throughputs rates (goods are picked at less than pallet-load quantities) and thereby requires higher employment levels when compared with slower moving lines which are stored and re-distributed at pallet-level quantities. Consequently, warehouses with broadly the same quantum of floor space can have significantly different employment levels; and
 - Increasing automation within warehouses, particularly for e-commerce, suggests future employment densities will be lower than today.
- 10.2 The land-use forecast methodology used in this section therefore seeks to overcome the apparent weakness. It is derived from the following key factors relating to new logistics facilities:
- The continual need to build new large-scale warehousing as a replacement for existing capacity which, over time, becomes life-expired (**replacement build**); and
 - Long-term growth in the demand for goods in the wider economy and the subsequent need for additional floor space in order to handle that growth (**growth build**).
- 10.3 Figure 10.1 overleaf seeks to summarise the forecast methodology.
- 10.4 Existing warehouse capacity can be quantified from available data sources, with a view then reached as to the likely replacement rate based on experience of the logistics sector. Freight traffic growth (a proxy for growth in the demand for goods) can be forecast using economic or traffic models, in this case the MDST GB Freight Model (used to produce forecasts for Network Rail and Highways England among other bodies). The growth is then related to floor space using cargo storage density and throughput rates expected at a modern distribution centre.

10.5 The base line forecast year adopted for this forecast exercise is 2021 as this represents the baseline position in terms of existing warehousing stock of over 9,000 sq.m. The key primary output is total new-build rates over a future time period (i.e. future demand for new-build units), measured as square metres of warehouse floor space. In this case, new-build rates up to 2050 have been forecast, with intervening years 2031 and 2041 also estimated. The forecasts are for the West Midlands region and for the Coventry and Warwickshire study area.

Figure 10.1: Overview of Replacement Demand and Traffic Growth Forecasting Methodology



Existing Warehouse Capacity

- 10.6 Given the above, the starting point of the land-use forecasting process is therefore to quantify the existing supply of large-scale logistics and distribution floor space capacity within the West Midlands region and the Coventry and Warwickshire study area. The data has been derived from MDST's warehouse database, which has been compiled from the Valuation Office Agency (VOA) non-domestic Rating List records (a record of all commercial property in England and Wales by floor space function and location, collated for Business Rates purposes). We have interrogated the raw database and extracted floor space data within commercial buildings with a designation 'warehouse' or a similar classification. For clarification, this includes:
- Floor space designated as 'warehouse' or similar within a building whose primary classification is 'Warehouse and Premises' i.e. a building purposely built to receive, store and distribute cargo (the classic distribution centre); and
 - Floor space designated as 'warehouse' or similar within a building that has some other primary classification e.g. a 'Factory and Premises' which contains floor space used to store and distribute goods manufactured at that site.
- 10.7 Property where the warehouse floor space (as defined) is greater than 9,000 square metres in total has been included, this broadly equating to buildings around 100,000 sq ft or larger, the logistics industry's recognised definition of a large-scale distribution centre. Other ancillary floor space designations (e.g. offices) have been excluded i.e. the total 'headline' size of a commercial property will be greater once these other floor space functions are included. Further, while the total quantum of 'warehouse' or similar floor space within an individual property is greater than 9,000 square metres, the actual floor space may be distributed over two or more different areas (zones) within the individual commercial property.
- 10.8 Across England and Wales a total of 2,438 buildings covering 51 million square metres of floor space can be identified from the VOA Rating List data (as at April 2021). A breakdown of these figures by Government Office Region are presented in the table below. The equivalent commercial property data in Scotland is collated by the Scottish Assessors Association (SAA). For reference, Scotland current accommodates around 1.4 million square metres of large scale warehouse floor space, of which around 1.1 million square metres is located in the 'Central Belt'.

Table 10.1 : Current (2021) Large Scale Warehouse Capacity England and Wales, by Region

Region	000s sq m	Number Units	sqm/unit
East Midlands	10,142	402	25,228
North West	8,328	419	19,876
West Midlands	7,559	385	19,634
Yorkshire and The Humber	7,064	336	21,023
East	5,576	270	20,651
South East	4,021	204	19,710
South West	2,903	132	21,994
North East	1,947	90	21,637
London	1,870	121	15,454
Wales	1,588	79	20,102
Total	50,998	2,438	20,918

Source: MDS Transmodal warehouse database (VOA Rating List)

Table 10.2 Relative Market Share of Large-Scale B8 Warehousing by Region

	Market Share (%)	
	Floor Space	Number Units
East Midlands	20%	16%
North West	16%	17%
West Midlands	15%	16%
Yorkshire and The Humber	14%	14%
East	11%	11%
South East	8%	8%
South West	6%	5%
North East	4%	4%
London	4%	5%
Wales	3%	3%

Source: MDS Transmodal warehouse database (VOA Rating List)

- 10.9 The table shows that the East Midlands region hosts just over 10.1 million square metres of floor space across 402 commercial properties. It is the largest region in terms of total floor space (20% market share), though the North West has a greater number of units. The West Midlands region has the third largest concentration of large-scale warehousing in England and Wales, with just under 7.6 million square metres (15% market share when measured by floor space). The average floor space per commercial property in the West Midlands is around 19,600 square metres, compared with the national average of 20,900 square metres per unit.
- 10.10 North Warwickshire has the largest concentration of warehousing in the region with just under 0.9 million square metres of floor space across 36 properties. There are also further significant

concentrations of floor space in Birmingham, Stoke-on-Trent and Staffordshire generally. Coventry and Rugby both have around 0.5 million square metres of floor space. The position with respect to the Coventry and Warwickshire study area is shown in the table below.

Table 10.3 Current (2021) Large-Scale Warehouse Floor Space in Coventry and Warwickshire

Local Authority	000s sq m	Number Units
North Warwickshire	874	36
Coventry	505	25
Rugby	431	21
Warwick	189	11
Nuneaton & Bedworth	173	9
Stratford On Avon	71	5
Total	2,244	107
Mean sqm/unit	20,969	

Source: MDS Transmodal warehouse database (VOA Rating List)

10.11 Just over 2.2 million square metres of large-scale warehouse floor space is located in the Coventry and Warwickshire study area. This represents around 30% of the West Midlands regional total. Also note that the mean size per unit is also larger than the regional average. This suggests that the Coventry and Warwickshire study area accommodates a sizeable concentration of floor space serving a national hinterland (both traditional NDCs plus e-commerce focused customer fulfilment centres or CFCs). These are generally larger than buildings serving a regional market given their greater role in holding inventory ahead of demand from end users.

10.12 The table below shows the quantum of large-scale logistics floor space that has been developed at rail-served sites in the Coventry and Warwickshire study area.

Table 10.4 Current (2021) Rail-served Large-Scale Warehousing in Coventry and Warwickshire

	000s sq m
Birch Coppice	406
Hams Hall	316
ProLogis Park Coventry*	121
Total - Rail-served	843
Total - all floor space	2,244
% rail-served	38%

Source: MDS Transmodal warehouse database (VOA Rating List)

* Sidings alongside for conventional box wagons

- 10.13 Just over 0.8 million square metres of rail-served warehousing is identified in the study area, equating to around 38% of current capacity. In the case of Birch Coppice and Hams Hall, the rail connectivity is provided by the warehousing being located within the same site as an intermodal terminal, with containers transferred between rail wagons and warehousing using off-road shunting equipment on the private estate roads. At ProLogis Park, some of the warehousing units are directly served by rail sidings along one side and are designed to handle palletised and semi-bulk cargoes in conventional box/cargo wagons. These sidings were a condition of planning consent. The use of conventional wagons is only economic when moving large quantities in one move (i.e. full train load) between two rail-served facilities. They are therefore not generally suited to consumer type cargoes, which tend to move in smaller but frequent shipments e.g. in containers. The site has therefore never handled regular train services.
- 10.14 There are no further rail-served warehousing sites in the West Midlands, albeit the West Midlands Interchange SRFI (Four Ashes) has recently received planning consent via a DCO. There are also stand-alone intermodal terminals at Landor Street Birmingham (Freightliner Birmingham) and Telford. DIRFT is located just over the regional boundary in the East Midlands, though it will be the case that some intermodal traffic passing through the site will be to/from warehouse units in the West Midlands. It lies relatively close to Rugby. East Midlands Gateway is located close to the A42 to the north. Overall, around 11% of the West Midlands warehouse capacity is rail-served albeit it is currently located in the Coventry and Warwickshire study area. For reference, across England and Wales around 6% of warehouse floor space is rail-served.

Use of Rail Freight

The National Policy Statement (NPS) on National Networks promotes the development of a network of Strategic Rail Freight Interchanges (SFRI) to aid the transfer of freight from road to rail, supporting sustainable distribution and reducing trip mileage of freight movement on the national and local road networks. It aims to optimise the use of rail in long-haul primary trunk journeys, with other modes then providing the secondary (final leg) of a trip, with a view to reducing carbon

emissions, addressing congestion and improving capacity on the road network, and addressing pollution. Government thus seeks to deliver a network of SRFIs.

It should be noted that warehousing on rail-served sites is not required to use rail; and businesses may locate to these sites to 'future proof' the sustainability of their operations whilst non rail-served sites can operate on a 'satellite' basis making use of rail terminals which are close to them. With the end of 'red diesel' exemptions in April 2022 there will be no financial benefit from warehousing being located on sites which include a rail terminal.

Coventry and Warwickshire is relatively well served by existing SFRI sites either within the sub-region or close to it (including at DIRFT) and there is the potential for development of a further site to come forwards at Hinckley.²³ We do not consider that there is currently sufficient evidence to justify recommending specific development of further rail-served capacity in Coventry & Warwickshire at the current time.

However to support the use of rail in transporting goods (with associated sustainability benefits), consideration should be given to the providing additional warehousing capacity in locations close to the SRFI to support and enable growth in the use of rail in transporting goods. Bringing forward capacity in locations close to existing SRFI, which could include as extensions to existing sites or new sites - as well as road-based locations elsewhere – is therefore appropriate.

Replacement Build

- 10.15 Most newly built floor space is a replacement for existing warehouse stock which is 'life expired'. While this may not be related to physical obsolescence (i.e. many older buildings will be structurally sound), they can become functionally obsolete. This is particularly the case concerning the growth of e-commerce, where many older buildings cannot accommodate the automated picking/packaging equipment required for on-line sales, or the ability to handle distribution to retail outlets alongside direct to home e-commerce deliveries under the same roof. Many existing retailers have therefore commissioned more modern facilities (to service their e-commerce platforms) which have directly replace older distribution buildings (e.g. Marks & Spencer at East Midlands Distribution Centre). Also, new floor space has been built for emerging e-commerce only retailers, such as Amazon or ASOS, much of which has effectively replaced floor space previously operated by 'bricks and mortar' retailers which have either ceased trading or have radically downsized to address the fall in 'high street' sales.

²³ <https://www.hinckleynrfi.co.uk/>

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- 10.16 A second factor is the ability, when compared with 20-30 years ago, to operate much larger distribution buildings. This has been facilitated by advances in modern ICT inventory management systems which have permitted much larger warehouses to be operated more efficiently than was previously the case. As a result, many operators have sought economies of scale can through merging operations based at multiple sites to one new location. Finally, changing market conditions, both within specific companies/sectors and in the wider economy, means that warehouse operations might need to relocate in order to remain competitive. Occupiers who previously sourced goods from domestic suppliers but now predominantly import from deep-sea markets may seek a new location at a rail-linked site in order to remain competitive.
- 10.17 A suitable example of these three issues is the on-line retailer very.co.uk (formerly Littlewoods and the Shop Direct Group). They have recently closed three older (functionally-obsolete) warehouse units in the Manchester area. The combined operations have been replaced by a modern purpose-built warehouse at the new East Midlands Gateway SRFI which can accommodate significant levels of automation. Economies of scale will be gained by merging three facilities into a single operation under one roof, and the East Midlands Gateway location was selected as it gave them direct access to an intermodal rail terminal, both as a means to reduce transport costs from the deep-sea container ports and 'future proofing' with regards to de-carbonisation.
- 10.18 Essentially, buildings reach the end of their useful economic life and are no longer suitable for their original designed use; a more modern replacement facility is therefore required. Older buildings can either be substantially refurbished for new occupiers or for a different use, or demolished and the plot 'recycled' for new buildings (which may or may not be warehousing). However, a consequence of this process is that new sites need to be brought forward (or new plots at existing sites) in order to allow occupiers to re-locate to new buildings, thereby releasing the existing facility for refurbishment or demolition.
- 10.19 In order to estimate the 'replacement build' element to 2050 (i.e. floor space which will become functionally obsolete or in some cases physically obsolete), the existing stock of large-scale warehousing in the West Midlands region and the Coventry and Warwickshire study needs to be considered. This has been undertaken and is detailed above.
- 10.20 On the basis that the average useful economic life of a modern warehouse building is 30 years, up to 2050 we could expect around 97% of the existing warehouse stock in the areas being considered to require replacement (i.e. $29 \text{ years}/30 \text{ years} = 97\%$). Likewise, up to 2031 and 2041 we could therefore expect around 33% and 67% respectively of the existing warehouse stock to require replacement. This can be considered the 'high replacement build' scenario as we have also considered a position where the rate of replacement begins to slow compared with historical trends. This may extend the useful life to around 40 years. This suggests that around 73% of the existing stock will require replacement up 2050. This can be considered the 'low replacement build' scenario.

10.21 The table below shows the estimated 'replacement build' rates under both scenarios for the Coventry and Warwickshire study and the West Midlands region to 2050.

Table 10.5 Replacement Build Rates to 2031, 2041 and 2050

Existing floor space - Coventry and Warks	2,244	000s sqm	
Existing floor space - West Midlands	7,559	000s sqm	
	000s sqm		
	2031	2041	2050
High Replacement Scenario			
Coventry and Warks	748	1,496	2,169
West Midlands	2,520	5,039	7,307
Low Replacement Scenario			
Coventry and Warks	561	1,122	1,627
West Midlands	1,890	3,780	5,480
High			
% replacement assuming	33%	to 2031	
30 years economic life	67%	to 2041	
	97%	to 2050	
Low			
% replacement assuming	25%	to 2031	
40 years economic life	50%	to 2041	
	73%	to 2050	

Source: MDST Warehouse Database and estimated replacement rates

Growth Build

10.22 Demand for warehouse floor space is driven by the need to handle, store and re-distribute cargo. Therefore, future economic growth in the wider economy along with forecast population increases will lead to a growth in the volume of consumer goods handled. This in turn will lead to increasing demand for additional warehouse floor space. Consequently, new warehouses are constructed partly to accommodate growing traffic volumes over the long term (the 'growth build' element).

10.23 In order to estimate the growth build element two factors need to be considered, namely:

- The current (2021) volume of goods which are delivered directly to large-scale distribution centres in Coventry and Warwickshire and the West Midlands region (i.e. only including those commodities which pass through large-scale distribution centres, so excluding bulk and semi-bulk cargoes such as aggregates and forest products); and

-
- Likewise, the volumes of goods that can be expected to be delivered directly to large-scale distribution centres in Coventry and Warwickshire and the West Midlands region in the forecast years up to 2050.
- 10.24 Both current and forecast volumes (as described) have been produced using the MDS Transmodal GB Freight Model. This is an analytical tool which can estimate existing freight flows (by origin-destination, mode, commodity and port of entry/departure for international traffics) and generate forecasts for future years (on the same basis) under different policy and economic scenarios. It has recently been used to generate forecasts for the DfT, Network Rail, Highways England, the NIC and Midlands Connect.
- 10.25 In 2020, MDS Transmodal produced an updated set of rail freight demand forecasts for Network Rail for the years 2023, 2033 and 2043 (to inform their long term planning process). They were subsequently re-produced in the recently published Solent-Midlands Multimodal Freight Strategy jointly produced by Network Rail and Highways England. We have therefore extracted the relevant rail and road forecast traffic volumes from the 'central' scenario (Scenario E) Network Rail forecasts. Values for 2031, 2041 and 2050 were interpolated from the 2033 and 2043 outputs.
- 10.26 The table below shows the total volume of cargo currently destined for Coventry and Warwickshire (for commodities which pass through large-scale warehouses) alongside the proportion estimated to be delivered directly to large scale distribution centres. Based on previous projects, we estimate this to be 45% of total tonnage delivered for road freight, while all inbound containerised rail traffic is assumed to be destined for a large-scale warehouse. It is also assumed that a proportion of intermodal rail traffic destined for an East Midlands terminal (DIRFT and East Midlands Gateway) will eventually end up in a West Midlands distribution centre (in this case, 25% is assumed). On the same basis, projected volumes for the forecast years up to 2050 are presented. The table following shows the equivalent figures for the West Midlands region.

Table 10.6 Existing and Forecast Freight Traffic Destined for Coventry and Warwickshire

Coventry & Warks	000s tonnes-lifted			
	2021	2031	2041	2050
Road				
Total	25,552	27,838	30,713	33,036
Total to warehouse	11,499	12,527	13,821	14,866
Intermodal Rail				
Total	943	985	1,152	1,246
To warehouse	943	985	1,152	1,246
From East Mids rail terminal - To warehouse	409	701	1,051	1,340
Total to warehouse	1,352	1,686	2,204	2,587
Total to warehouse	12,851	14,213	16,025	17,453
Growth v 2021		1,362	3,174	4,602

Source: MDS Transmodal GB Freight Model

Table 10.7 Existing and Forecast Freight Traffic Destined for West Midlands

West Midlands	000s tonnes-lifted			
	2021	2031	2041	2050
Road				
Total	132,003	147,002	167,538	183,528
Total to warehouse	59,402	66,151	75,392	82,588
Intermodal Rail				
Total	2,423	3,107	4,427	5,328
To warehouse	2,423	3,107	4,427	5,328
From East Mids rail terminal - To warehouse	409	701	1,051	1,340
Total to warehouse	2,832	3,808	5,478	6,669
Total to warehouse	62,234	69,959	80,870	89,256
Growth v 2021		7,725	18,636	27,022

Source: MDS Transmodal GB Freight Model

- 10.27 The forecasts, as described, indicate that for the Coventry and Warwickshire study area an additional 4.6 million tonnes can be expected to pass through large scale distribution centres in 2050 compared with 2021. Likewise, the equivalent figure for the West Midlands region is an additional 27 million tonnes over 2021 volumes.
- 10.28 The growth in annual traffic for each forecast year (when compared with 2021 levels) have subsequently been converted into the need for additional floor space i.e. the growth build element,

using generally accepted 'conversion factors' which relates annual tonnage throughput and floor space at large scale 'high bay' type warehouses. The tables below show the forecast traffic growth alongside the additional floor space required to handle that growth.

Table 10.8 Forecast Traffic Growth and Additional Floor Space Required

	2031	2041	2050
Coventry and Warks			
Traffic growth v 2021 (000s tonnes)	1,362	3,174	4,602
Additional floor space (000s sqm)	54	125	181
West Midlands			
Traffic growth v 2021 (000s tonnes)	7,725	18,636	27,022
Additional floor space (000s sqm)	304	733	1,063

Source: MDS Transmodal GB Freight Model and Consultant estimations

Total New-Build and Land Requirements

- 10.29 By combining the 'replacement build' and 'growth build' elements, the total warehouse new-build which can be expected for each forecast year can be calculated. This is shown in the tables below for the various scenarios.

Table 10.9 Forecast New-Build Rates to 2050 – Coventry and Warwickshire

	000s sqm		
Coventry and Warks	2031	2041	2050
High Replacement Scenario			
Replacement build	748	1,496	2,169
Growth build	54	125	181
Total	802	1,621	2,350
Low Replacement Scenario			
Replacement build	561	1,122	1,627
Growth build	54	125	181
Total	615	1,247	1,808

Source: MDS Transmodal GB Freight Model and Consultant estimations

Table 10.10 Forecast New-Build Rates to 2050 – West Midlands

West Midlands	000s sqm		
	2031	2041	2050
High Replacement Scenario			
Replacement build	2,520	5,039	7,307
Growth build	304	733	1,063
Total	2,824	5,773	8,371
Low Replacement Scenario			
Replacement build	1,890	3,780	5,480
Growth build	304	733	1,063
Total	2,194	4,513	6,544

Source: MDS Transmodal GB Freight Model and Consultant estimations

NB: The West Midlands total includes the new-build rate for Coventry and Warwickshire

- 10.30 For the High Replacement scenario within Coventry and Warwickshire, around 1.6 million square metres of new large-scale warehouse floor space is forecast to be built by 2041 and just under 2.4 million square metres by 2050. For the West Midlands region as a whole, we would expect around 8.4 million square metres of new-build floor space by 2050.

Note the 'land required' figure in the tables above is simply the gross area of land required to accommodate the new-build forecast assuming a 40% floorspace to plot footprint ratio. It is not the amount of new land that will need to be brought forward in plans, as no account has been made at this stage of existing consents or local plan allocations.

Traffic Forecasts – Sensitivity Analysis

- 10.31 We have also undertaken a 'sensitivity test' freight forecast. In this case, the forecast traffic volumes quoted above for 2050 are estimated to grow by a further 15%, with the volumes in the interval years interpolated between the higher 2050 forecast and the 2021 actual. This is shown in the table below for Coventry and Warwickshire and the West Midlands region.
- 10.32 The sensitivity analysis is run to understand the effect of changes in the traffic growth volumes on the overall need for warehousing floorspace. It aims to understand and quantify what impact a 15% uplift in traffic volumes would have on warehouse space.

Table 10.11 Sensitivity Test Traffic Forecast (2050 Traffic Forecast + 15%) – Coventry and Warwickshire

Coventry & Warks	000s tonnes-lifted			
	2021	2031	2041	2050
Road				
Total	25,552	29,842	34,131	37,991
Total to warehouse	11,499	13,429	15,359	17,096
Rail				
Total	943	1,112	1,281	1,433
To warehouse	943	1,112	1,281	1,433
From East Mids rail terminal - To warehouse	409	799	1,190	1,541
Total to warehouse	1,352	1,912	2,471	2,975
Total to warehouse	12,851	15,340	17,830	20,071
Growth v 2021		2,490	4,979	7,220

Source: MDS Transmodal GB Freight Model plus 15% additional traffic

Table 10.12 Sensitivity Test Traffic Forecast (2050 Traffic Forecast + 15%) – West Midlands

West Midlands	000s tonnes-lifted			
	2021	2031	2041	2050
Road				
Total	132,003	159,263	186,524	211,058
Total to warehouse	59,402	71,669	83,936	94,976
Rail				
Total	2,423	3,701	4,978	6,128
To warehouse	2,423	3,701	4,978	6,128
From East Mids rail terminal - To warehouse	409	799	1,190	1,541
Total to warehouse	2,832	4,500	6,168	7,669
Total to warehouse	62,234	76,169	90,104	102,645
Growth v 2021		13,935	27,870	40,411

Source: MDS Transmodal GB Freight Model plus 15% additional traffic

- 10.33 On this basis, for Coventry and Warwickshire an additional 7.2 million tonnes can be expected to pass through large scale distribution centres in 2050 compared with 2021 (or a further 2.6 million tonnes annually over the standard traffic forecast). Likewise, the equivalent figure for the West Midlands region is an additional 13.4 million tonnes over 2021 volumes.
- 10.34 As per above, the growth in annual traffic (compared with 2021 levels) for the sensitivity test traffic forecasts have subsequently been converted into the need for additional floor space using the same

generally accepted 'conversion factors'. The tables below show the sensitivity test forecast traffic growth alongside the additional floor space required to handle that growth.

Table 10.13 Sensitivity Test Forecast Traffic Growth and Additional Floor Space Required

	2031	2041	2050
Coventry and Warks			
Traffic growth v 2021 (000s tonnes)	2,490	4,979	7,220
Additional floor space (000s sqm)	98	196	284
West Midlands			
Traffic growth v 2021 (000s tonnes)	13,935	27,870	40,411
Additional floor space (000s sqm)	548	1,097	1,590

Source: MDS Transmodal GB Freight Model plus 15% and Consultant estimations

- 10.35 Again, by combining the 'replacement build' and 'growth build' elements, the total warehouse new-build which can be expected for each forecast year can be calculated. This is shown in the tables below for the various scenarios.

Table 10.14 Traffic Forecast and Sensitivity Test Comparison – Coventry & Warwickshire

Coventry and Warks	000s sqm		
	2031	2041	2050
High Replacement Scenario			
Replacement build	748	1,496	2,169
Growth build	98	196	284
Total	846	1,692	2,453
Low Replacement Scenario			
Replacement build	561	1,122	1,627
Growth build	98	196	284
Total	659	1,318	1,911

Source: MDS Transmodal GB Freight Model + 15% and Consultant estimations

Table 10.15 Traffic Forecast and Sensitivity Test Comparison – West Midlands

West Midlands	000s sqm		
	2031	2041	2050
High Replacement Scenario			
Replacement build	2,520	5,039	7,307
Growth build	548	1,097	1,590
Total	3,068	6,136	8,897
Low Replacement Scenario			
Replacement build	1,890	3,780	5,480
Growth build	548	1,097	1,590
Total	2,438	4,876	7,071

Source: MDS Transmodal GB Freight Model + 15% and Consultant estimations

Overall Results

- 10.36 The tables below therefore compares the standard traffic forecast outputs with those for the sensitivity test (for the High Replacement scenario). Overall, the sensitivity test only adds around 100,000 square metres to the new-build rate by 2050. This illustrates that the replacement demand – the need for newer, modern warehouse units - is the main driver of floorspace needs within the model.

Table 10.16 Traffic Forecast and Sensitivity Test Comparison

	000s sqm		
	2031	2041	2050
Coventry and Warks			
Traffic Forecast Low Replacement	615	1,247	1,808
Traffic Forecast High Replacement	802	1,621	2,350
Sensitivity Test High Replacement	846	1,692	2,453
Difference	44	71	103
West Midlands			
Traffic Forecast Low Replacement	2,194	4,513	6,544
Traffic Forecast High Replacement	2,824	5,773	8,371
Sensitivity Test High Replacement	3,068	6,136	8,897
Difference	244	363	527

- 10.37 Assuming a range of plot ratios, the requirement range for the study area’s strategic warehousing needs is set out below. This is then compared to the results of the completions trend analysis.
- 10.38 It is of note the 0.35 plot ratio was preferred in the Leicestershire Strategic Distribution 2021 report based on plot ratio testing. We consider this to be more appropriate based on recent development

trends. On this basis the modelling suggests that the completions trends of the 2011-19 period may exceed the needs over the plan period to 2041.

Table 10.17 Coventry and Warks Strategic Warehousing Land Needs 2021-2041, ha

	Sq.m floorspace	Land (Ha) @0.4 Plot Ratio	Land (Ha) @0.35 Plot Ratio
Traffic Forecast Low Replacement	1,247,000	312	356
Sensitivity Test Low Replacement	1,318,000	330	377
Traffic Forecast High Replacement	1,621,000	405	463
Sensitivity Test High Replacement	1,692,000	423	483
Completions Projection			458

Source: MDST/lceni

10.39 In drawing conclusions there are then a number of key issues which arise including:

- a) is it more appropriate to use the low or high replacement scenario;
- b) what weight should be given to the sensitivity testing and completions trends; and
- c) to what extent is it feasible to see replacement – i.e. redevelopment of buildings – happening on existing sites, or indeed former industrial sites, as opposed to requiring new land.

10.40 There are a number of different factors which need to be weighed up in assessing the 'high replacement' and 'low replacement scenarios.' These include:

1. Market evidence suggests that while many existing older buildings may be physically sound, they are increasingly becoming functionally obsolete. To a great extent, this situation is being driven by changes in the retail sector, and in particular the large growth rates for e-commerce. As noted above, many older buildings cannot accommodate the automated picking/packaging equipment required for on-line sales, or the ability to handle distribution to retail outlets alongside direct to home e-commerce deliveries under the same roof. Many existing retailers have been and are continuing to modernise their distribution facilities. A further consequence of e-commerce growth is a growing need for smaller purpose built 'cross-dock' type facilities close to urban conurbations where goods from on-line customer fulfilment centres can be transferred directly to LGVs/MGVs for final delivery to residential properties. This requirement is effectively replacing the traditional RDC warehouse.

2. The de-carbonising agenda is likely to drive further demand for warehouse facilities which are either directly served by the railway network (such as at Birch Coppice or Hams Hall) or at sites close to intermodal terminals. Long distance trunk-hauls from ports and to/from more distant domestic origins/destinations can then be undertaken by (predominantly) electric powered trains (as battery electric HGVs are unlikely to have sufficient range).

3. Increasing automation within warehouses and the need for RDCs and ‘cross-dock’ type facilities to be equipped with fast-charging points (in order that multiple LGVs/MGVs can be re-charged while they are loaded) is driving demand for warehouse facilities which have substantially higher electric power requirements. Many older warehouses are located where the regional electricity distribution network does not have sufficient capacity, leading to demand for new buildings at locations where grid power capacity is available.

4. Set against this, the capital values of many units build from the late 1990 onwards is likely to be too high to see them demolished. We would therefore expect to see some refurbishment (rather than replacement) of stock build post 2000 or sub-division to provide smaller units. Refurbishment is most likely for units on plots of over 10 ha.

10.41 These factors draw in different directions, and we consider that it would therefore be appropriate to take the midpoint between the low and high replacement scenarios in identifying a minimum level of floorspace provision. This equates to a minimum need for 410 ha to 2041.

10.42 We do however consider that there are there are factors which point to the potential to see stronger demand than this. Firstly is the shift towards e-commerce which has arisen from the Covid-19 pandemic, which has accelerated previous trends. Second is the effects of trade disruptions and macro-economic uncertainties, including the effects of Brexit and the blocking of the Suez Canal, on level of stock holding (the impacts of which have been to increase the requirements for warehouse space).

10.43 IcenI therefore consider that it would be appropriate to plan for future development to be in line with recent completions trends over the initial 10 year period (2021-31), with the subsequent decade then seeing potentially slower growth in line with the traffic growth and replacement demand modelling.

Table 10.18 Conclusions on the Quantitative Need for Strategic Warehousing Floorspace

	Ha
Need 2021-31 (based on completions trend)	229
Need 2031-41 (based on traffic growth and replacement demand)	205
Total need	434

10.44 As is standard practice, it is then appropriate to include a margin to support a choice of sites in a competitive market and ensure that there is some flexibility of supply to allow for some unforeseen delays in delivery without constraining the market. A 5 year margin based on the 5 year completions trend in considered appropriate.

10.45 The table below calculates on this basis the scale of development which we would recommend is planned for.

Table 10.19 Recommended Need for Strategic B8 – Coventry & Warwickshire

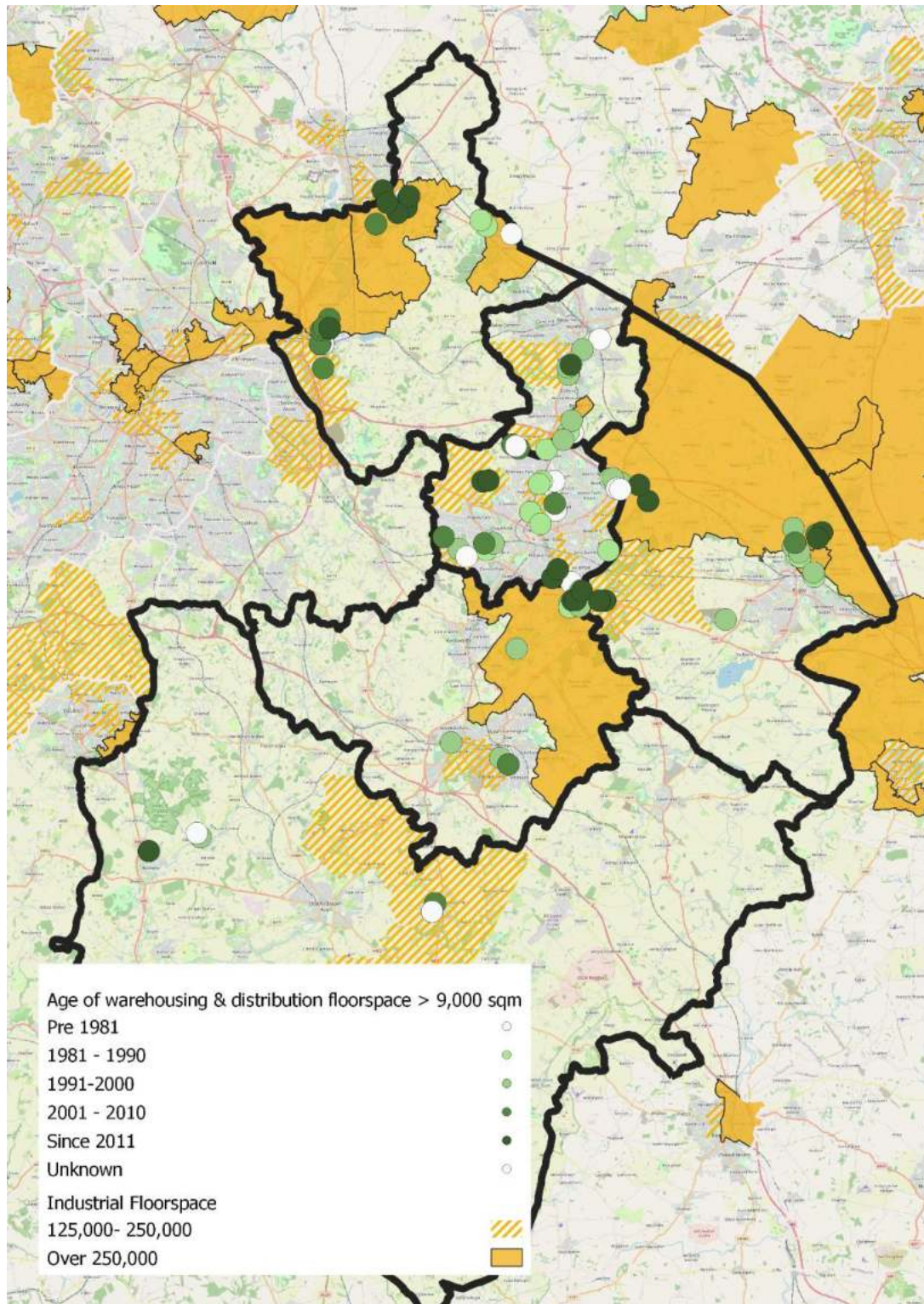
Ha	Need to 2041	Need to 2050
Base Need	491	594
5 Year Margin	115	115
Total Land Requirement	606	709

The Potential for Recycling or Reuse of Existing Strategic B8 Sites

- 10.46 The above analysis identifies the quantum of development which might be expected together with the appropriate supply-side margin to allow for demand uncertainties, slippage and ensure a choice of sites.
- 10.47 In this section we move on to consider the degree to which it might be realistic for part of the need identified to be met through recycling of existing sites, and to provide guidance for the detailed local consideration of the potential for this.
- 10.48 In general terms, sites which are likely to be suitable for redevelopment to provide new large warehousing units will be on plot of over 10 ha in good quality locations which relate well to the strategic road / main A-road network, have adequate power supply, are accessible by public transport and where there are no neighbouring uses which could restrict the operation of the warehouse.
- 10.49 The work on the HEDNA has not included a detailed assessment of existing sites to assess the ongoing suitability to cater for the needs of this market segment, and address issues such as the shape of plots, access, environmental quality, adjacent uses, public transport accessibility etc. However we have sought to give some consideration to the potential to deliver a proportion of the assessed through the redevelopment of existing sites.
- 10.50 The map below indicates that existing warehousing space in the sub-region of over 9,000 sq.m is generally relatively well-located having regard to the strategic road network. However older stock is particularly concentrated within Coventry and in established estates in Rugby and Nuneaton. Urban sites in Coventry away from the Strategic Road Network may be less attractive, but there may be other locations such as Bermuda Business Park, Swift Valley or Atherstone where land can be recycled. Supply assessments for individual authorities might consider these issues further to further interrogate whether a proportion of the identified need could be met through existing sites. Equally there is potential for brownfield former manufacturing sites to come forwards, which in some circumstances may be suitable for large scale B8 development.²⁴ These issues can be picked up through local authorities' land availability assessments.

²⁴ We note for instance that Prologis Ryton and Hams Hall were brownfield sites.

Figure 10.2: Spatial Distribution of B8 Units of over 9,000 sq.m by Age



11. DRAWING CONCLUSIONS ON EMPLOYMENT LAND NEEDS

- 11.1 The outcomes of the modelling and recommended future requirements are considered below with a view to drawing conclusions on future employment land needs. The analysis includes consideration of an appropriate 'margin' for flexibility.

Offices

- 11.2 In most instances the VOA trend is negative based on the last ten years of net change. Significant losses in Warwick and Coventry have been seen historically and are extrapolated forwards in this scenario. However this unlikely to be realistic or desirable, given that PDR related losses will have converted poorer quality stock already and there is likely to be demand in the future from growing sectors. New City Centre office floorspace has been coming forwards in Coventry City Centre at Friargate since 2018 which has driven up the gross completions trend.
- 11.3 Given that office requirements tend to be closely linked to employment levels, it is recommended that in the round **the labour demand models best represent future needs for office floorspace**. The labour demand should best represent the future economic outlook, it is recommended that this be used for planning policy requirements.
- 11.4 There is some uncertainty about future levels of occupancy and utilisation of offices post pandemic and clarity regarding this may not be gained for some time. At the present time it would be reasonable to plan for the modelled needs, but it may be suitable to consider a lower rate of need based on the sensitivity model that assumes that homeworking trends permanently increase to reduce future densities by around 30% (Tables 10.7 / 10.8).
- 11.5 In reality there is some expectation that future office demand will be focused on higher quality provision that is more likely to manifest in stronger markets – notably Coventry and Warwick/Leamington – which is reflected to a degree in the labour demand figures.
- 11.6 It is of note that Friargate in Coventry City Centre – 2.35m sq.ft offices – would deliver substantially above the forecasts here and has the potential to support additional inward investment in City Centre as well as compensate for historic under delivery and past losses. Grade A space can attract inward investment and will likely capture greater share of take-up than historically. However wider office market trends point to lower overall demand in the future in the post pandemic period; with competition from other locations such as Birmingham City Centre and Arden Cross. It will be important to monitor market trends.

Industrial and Warehousing

- 11.7 The VOA trends for net floorspace changes are high in North Warwickshire and Rugby, driven by warehousing developments and demand. These are more pronounced in recent years influenced by strong demand for both manufacturing and warehousing/ logistics space. Furthermore trends in Nuneaton and Bedworth, Stratford-on-Avon and Coventry have also been positive recently – in part influenced by delivery on sites allocated through local plans.
- 11.8 The labour demand model produces a much narrower range and suggests that forecast industrial losses are outweighed by gains in warehousing needs in all areas – although in reality these may be overly influenced by national trends in manufacturing rather than representing actual floorspace requirements for industry, further compounded by a delinking of floorspace needs from jobs growth as capital inputs drive productivity to a greater extent than workforce growth does.
- 11.9 Neither the VOA or labour demand models are able to differentiate the strategic and more local industrial / warehouse requirements.
- 11.10 **The completions data is likely to be the best representation of market needs for the next phase of plan making for industrial / warehousing floorspace** particularly for the short/medium-term. Comparing the completions data with other sources, monitoring by authorities suggests far higher levels of development have been achieved and therefore may be required in the future.
- 11.11 Consultation suggests that **whilst B8 demand is very strong, and that there is a need for separate allocations for B1c/B2 where land is delineated from sites going for B8** in order to support the manufacturing sector. There is a strong manufacturing sector in the sub-region which needs to be provided for.

Adjustments for Margin

- 11.12 It is recommended a margin for flexibility be applied that recognises:
- Forecasting is not an exact science;
 - Locational and site size requirements vary; and
 - Potential for delay/slippage in sites coming forward.
- 11.13 The margin allows for the potential for delay in some sites coming forwards; an additional buffer so that in future demand is greater than forecasts it can be accommodated, and to reflect the right market in recent years with low current vacancy rates.

- 11.14 This is included as five years of gross completions for industrial / distribution²⁵ and 2 years for offices / R&D, as shown below. Five years is traditionally considered suitable as a margin however in the case of offices it is disproportionate to the scale of need modelled and likely to lead to an over inflation of figures.

Table 11.1 Margin for Flexibility (excl strategic B8) (Ha)

	Office/ R&D	Industrial exc B8 strategic	Total
N. Warwickshire	0.7	11.2	11.9
N. and Bedworth	0.2	9.1	9.3
Rugby	1.9	30.1	32.0
Stratford-on-Avon	-	33.2	33.2
Warwick	-	11.2	11.2
Coventry	4.6	29.5	34.1
Total	7.5	257.4	264.9

Source: Icen

- 11.15 For Stratford and Warwick, data issues mean no office margin is included. It may therefore be appropriate to treat figures as minima; but this should be informed by detailed consideration of the office stock and trends in losses.

Replacement Demand

- 11.16 Replacement demand factors make provision for losses of future stock, assuming that past patterns of losses continue. It is normal that some stock is lost as it ages and premises become redundant. This can be due to changing industry patterns or because firms simply need new premises. Differences between losses and gains as well as market feedback can be useful indicators of the need for replacement demand. The sector by sector matters are discussed below.

Offices

- 11.17 Considerable losses have occurred in Coventry through Change of Use under Permitted Development Rights (PDR). The VOA negative net trend is considerable in Coventry and to a lesser extent in Warwick. The Friargate scheme is an ambitious proposal for Coventry that can both compensate for some losses of older stock and attract new investment. Otherwise, Icen is of the view that specific provision for replacement demand of offices is not warranted in the current market.

Industrial and Warehousing

- 11.18 If a positive approach is taken to provision overall, through the use of gross completions, there is no need to make further inclusion for replacement demand. If net (VOA) trends were used then a considerable additional allowance would be required. Making a judgement on the rate of replacement of older stock (such as 50% of historic losses) preferably requires a detailed understanding of the

²⁵ Increased on a pro-rata basis for projections to 2050

pattern, type and nature of losses in local areas which is better suited to individual area ELRs. Using the gross completions does assume that past losses will to an extent continue and some of the forecast need may occur on recycled existing industrial premises.

Recommendations

11.19 Taking into account the narrative above the following recommendations are made in regard to future needs. These draw on:

- labour demand modelling for office needs;
- gross completions trends for industrial and warehousing; and
- margin.

Table 11.2 Employment Land Needs 2021-2041, ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	5.3	56.1	61.4	
N. and Bedworth	2.2	45.5	47.7	
Rugby	5.2	150.5	155.7	
Stratford-on-Avon	5.2	166.1	171.3	
Warwick	11.4	56.2	67.6	
Coventry	8.5	147.6	156.1	
Total	37.8	755.0	792.8	606

Source: VOA / CE/lceni

Table 11.3 Employment Land Needs 2021-2050, ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	7.0	81.4	88.4	
N. and Bedworth	3.0	66.0	69.0	
Rugby	6.5	218.2	224.7	
Stratford-on-Avon	7.2	240.9	248.1	
Warwick	15.8	81.4	97.2	
Coventry	10.0	214.0	224.0	
Total	60.3	373.3	433.6	709

Source: VOA / CE/lceni

Meeting the Strategic B8 Need

11.20 We next turn to consider what approach should be used in meeting the strategic B8 need identified.

11.21 The PPG outlines that strategic policy-making authorities will then need to consider the most appropriate locations for meeting these identified needs (whether through the expansion of existing sites or development of new ones). There are clearly multiple technical issues to be considered in assessing specific prospective sites including environmental and highways impacts, impacts on Green Belt or the landscape, through to power requirements etc. The intention of this report is therefore not to recommend specific locations, but to provide guidance which the local authorities in the sub-region can use in considering what sites are appropriate.

11.22 We consider that key locational considerations include:

- Road accessibility – sites should be located where they can be accessed from the strategic road network (motorway or significant A-road) which has capacity (or the potential to improve capacity) to support the proposed development. Regard in this respect should be had to planned improvements;
- Power supply – sites should be located where there is potential to access sufficient power. This is an important consideration given the potential for increased automation, electrification of vehicle fleets, and systems for chilled goods. Some power could however be generated through modern buildings with solar panels/ photovoltaics.
- Proximity to Rail Terminals – as explained co-location of warehousing on sites with rail terminals is becoming less relevant, but there are potential sustainability benefits and cost savings to transporting goods long distance by rail. The potential for rail access will also help to future proof investments. Sites close to existing / planned terminals with capacity should be assessed more positively.
- Labour availability – accessibility to labour is an important consideration. Locations which can draw on a wider labour pool should be assessed more positively. This will include urban areas within the sub-region, as well as outside of it – including Birmingham for instance. Regard should be had to the accessibility of locations by public transport, particularly from deprived areas and those with available labour market capacity, and the ability of employment nodes with a greater density of employment to sustain regular public transport services.
- Neighbouring activities – supply should not be located in close proximity to residential areas (or accessed through them), with suitable locations able to support 24/7 operations. They should be away from incompatible land uses. Locations should be able to accommodate high bay warehousing of at least 20m height without unacceptable impacts.

11.23 With this set of considerations in mind we would recommend that a geographical spread of commercially attractive sites is identified and brought forward, with the aim of catering for the requirements of occupiers with different locational requirements and avoiding issues of over-concentration which can create localised issues of labour market competition between businesses.

11.24 We consider on this basis that key potential corridors within the sub-region which could accommodate strategic B8 development include:

- M42/A446 Corridor – there is an existing concentration of B8 development in this area, which benefits from a rail terminal at Hams Hall and is proximate to a concentration of population in Birmingham including deprived areas in East Birmingham;
- M6 Corridor – this corridor includes Junctions 2 and 3 on the northern side of Coventry, as well as Junction 1 at Rugby. Coventry is a large population centre which includes areas of deprivation.
- M45/A45 Corridor – this corridor has seen the successful delivery of B8 development at Prologis Ryton, which is close to Coventry as a main population centre, with further land with planning permission at Symmetry Park Rugby and Coventry and Warwickshire Gateway. There is a rail terminal at DIRFT.
- A5 Corridor – this Corridor includes rail terminals at Hams Hall and DIRFT and connects to the M42, M6 and M1. There are however potential issues of capacity and the prospect/funding of dualling of the road. Parts of the corridor fall outside of the Green Belt.

11.25 Existing concentrations of development indicates that the above are attractive locations for strategic B8 development and relate well to the Golden Triangle. However there is the potential that over concentration of development in these areas in the north/west of the sub-region could create pressures particularly in terms of the highways network and labour market (subject to detailed assessment). Icenl therefore consider that there is the potential for other corridors within the sub-region, particularly in South Warwickshire, to play a greater potential role in providing strategic B8 development than they have historically. These include:

- M40 Corridor – there has been strategic B8 development brought forwards at Banbury and Bicester, highlighting the potential of this corridor. There is potential to consider provision at or close to junctions on this corridor within the sub-region.
- A46 Corridor – there is limited strategic B8 development on this corridor with potential that it could play some role in the future.

11.26 We would therefore envisage a continuing focus of strategic B8 growth in the north and west of the sub-region, but with a greater potential role for South Warwickshire than seen historically. Given the need for Green Belt development if the needs identified are to be met, it would be advisable to

coordinate assessment of suitable sites at a sub-regional level to integrate relevant consideration including landscape harm, power capacity, and seek to limit harm to Green Belt purposes. It would not be appropriate in our view to simply replicate past development patterns in respect of the spatial distribution of development by local authority.

PART D: MIX OF HOMES NEEDED

12. SIZES AND TYPES OF HOMES NEEDED

12.1 This section considers the appropriate mix of housing across the study area, with a particular focus on the sizes of homes required in different tenure groups for new development. This section looks at a range of statistics in relation to families (generally described as households with dependent children) before moving on to look at how the number of households in different age groups are projected to change moving forward.

Background Data

12.2 The number of families in Coventry-Warwickshire (defined for the purpose of this assessment as any household which contains at least one dependent child) totalled 104,800 as of the 2011 Census, accounting for 29% of households; this proportion is similar to the regional and national average.

12.3 This analysis has drawn on 2011 Census data which is now somewhat out-of-date. However, it would be expected that general patterns between areas will remain broadly the same (i.e. areas with greater proportions of family households in 2011, will still be expected to have greater proportions now). New (2021) Census data should start to filter through later in 2022, which will allow for this analysis to be updated.

Table 12.1 Households with dependent children (2011)

		Married couple	Cohabiting couple	Lone parent	Other household (with dependents)	All other households (no dependent children)	Total	Total with dependent children
Coventry-Warwickshire	No.	55,464	14,155	26,433	8,785	254,760	359,597	104,837
	%	15.4%	3.9%	7.4%	2.4%	70.8%	100.0%	29.2%
West Midlands	%	15.4%	4.3%	7.5%	2.9%	69.8%	100.0%	30.2%
England	%	15.3%	4.0%	7.1%	2.6%	70.9%	100.0%	29.1%

Source: Census (2011)

12.4 The table below shows the same information for each local authority. The analysis shows relatively few family households in Stratford-on-Avon (26%) and higher proportions in Coventry and Nuneaton & Bedworth; Coventry also sees a higher proportion of lone parent households than other locations.

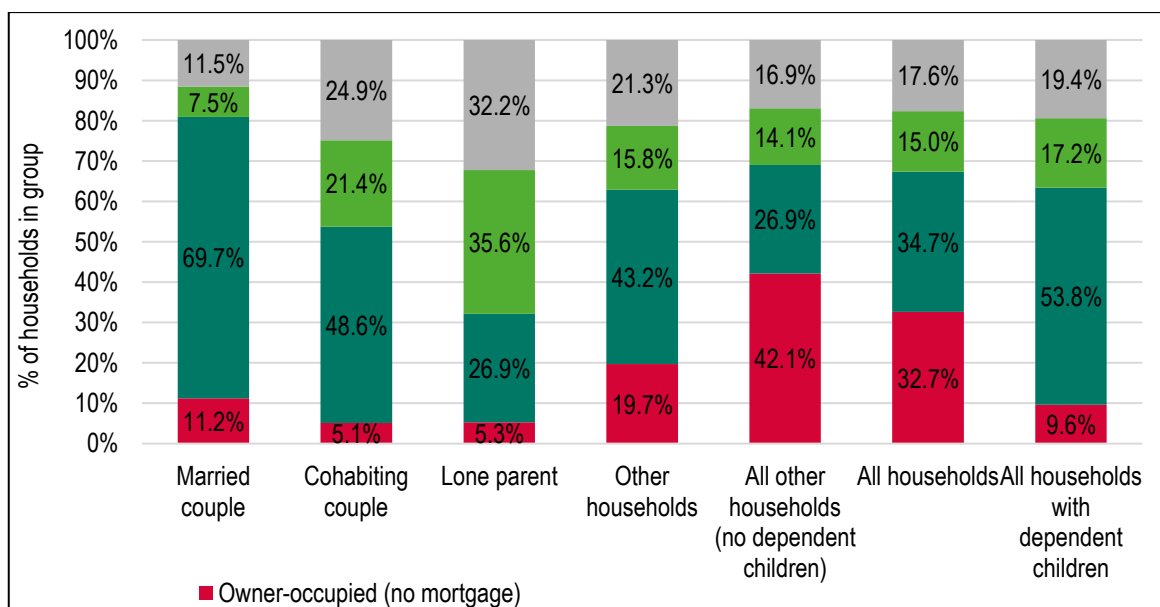
Table 12.2 Households with Dependent Children (2011) – local authorities

	Married couple	Cohabiting couple	Lone parent	Other household (with dependents)	All other households (no dependent children)	Total	Total with dependent children
Coventry	14.3%	3.9%	9.6%	3.2%	69.0%	100.0%	31.0%
North Warwickshire	15.3%	5.0%	5.8%	2.1%	71.6%	100.0%	28.4%
Nuneaton & Bedworth	15.4%	5.0%	7.5%	2.3%	69.8%	100.0%	30.2%
Rugby	16.9%	4.3%	6.4%	2.2%	70.2%	100.0%	29.8%
Stratford-on-Avon	16.7%	3.1%	4.9%	1.5%	73.8%	100.0%	26.2%
Warwick	15.8%	3.1%	5.7%	2.1%	73.4%	100.0%	26.6%
Warwickshire	16.1%	4.0%	6.1%	2.0%	71.9%	100.0%	28.1%
Coventry-Warwickshire	15.4%	3.9%	7.4%	2.4%	70.8%	100.0%	29.2%

Source: Census (2011)

12.5 The figure below shows the current tenure of households with dependent children. There are some considerable differences by household type with lone parents having a very high proportion living in the social rented sector and also in private rented accommodation. Only 32% of lone parent households are owner-occupiers compared with 81% of married couples with children.

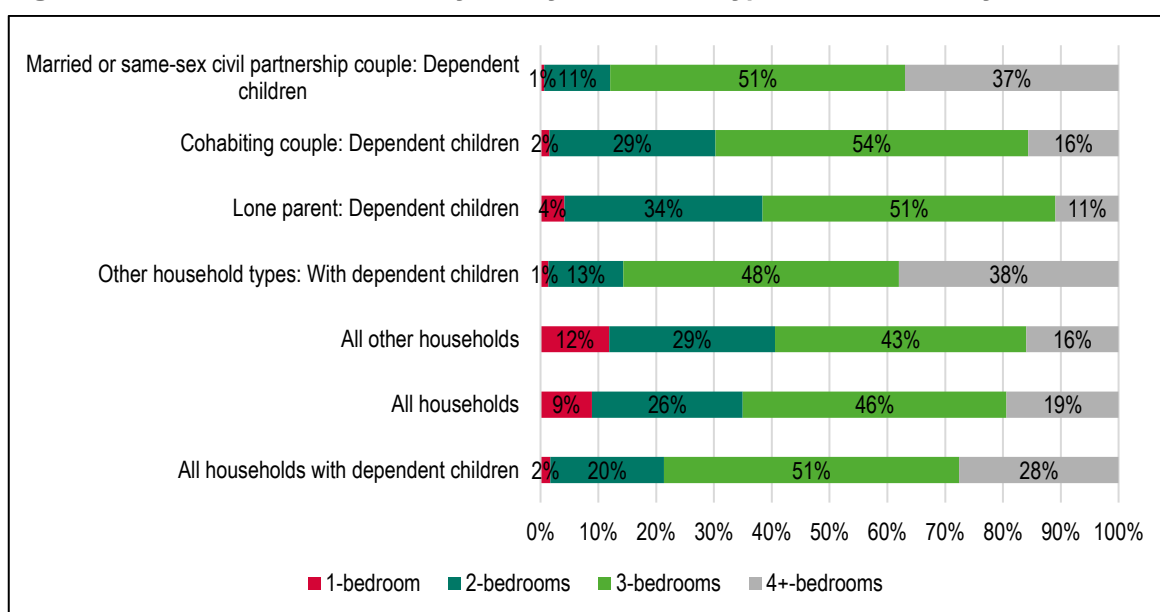
Figure 12.1: Tenure of households with dependent children (2011) – Coventry-Warwickshire



Source: Census (2011)

12.6 The figure below shows the number of bedrooms for family households at the point of the 2011 Census. The analysis shows the differences between married, cohabiting and lone parent families. Across the study area, the tendency is for family households to occupy 3-bedroom housing with varying degrees of 2-and 4+-bedroom properties depending on the household composition. The data also, unsurprisingly, highlights the small level of 1-bed stock occupied by families across the board. As a result, we could expect continued demand for 3+-bedroom homes from family households.

Figure 12.2 Number of Bedrooms by Family Household Type, 2011 – Coventry-Warwickshire



Source: Census (2011)

The Mix of Housing

- 12.7 A model has been developed that starts with the current profile of housing in terms of size (bedrooms) and tenure. Within the data, information is available about the age of households and the typical sizes of homes they occupy. By using demographic projections linked to the local housing need calculated through the standard method, it is possible to see which age groups are expected to change in number, and by how much.
- 12.8 On the assumption that occupancy patterns for each age group (within each tenure) remain the same, it is therefore possible to assess the profile of housing needed over the assessment period (taken for the purposes of analysis to be the 2022-32 period).
- 12.9 An important starting point is to understand the current balance of housing in the area – the table below profiles the sizes of homes in different tenure groups across areas. The data shows a generally similar profile of housing in each tenure group when compared with the regional and national position. Observations about the current mix feed into conclusions about future mix later in this section.

Table 12.3 Number of Bedrooms by Tenure, 2011

		Coventry- Warwickshire	West Midlands	England
Owner-occupied	1-bedroom	2%	2%	4%
	2-bedrooms	21%	20%	23%
	3-bedrooms	52%	54%	48%
	4+-bedrooms	25%	24%	25%
	Total	100%	100%	100%
Social rented	1-bedroom	31%	29%	31%
	2-bedrooms	35%	34%	34%
	3-bedrooms	31%	33%	31%
	4+-bedrooms	3%	4%	4%
	Total	100%	100%	100%
Private rented	1-bedroom	16%	18%	23%
	2-bedrooms	39%	37%	39%
	3-bedrooms	34%	36%	28%
	4+-bedrooms	12%	10%	10%
	Total	100%	100%	100%

Source: Census (2011)

- 12.10 The table below shows the same information for each of the local authorities – this shows broadly similar patterns across areas although there are a few notable differences; this includes a high proportion of 4+-bedroom market homes in Stratford-on-Avon, lower proportions of 1-bedroom social rented homes in Stratford-on-Avon and North Warwickshire.

Table 12.4 Number of Bedrooms by Tenure, 2011 – local authorities in Coventry-Warwickshire

		Coven- try	N Warwks	N & B	Rugby	SoA	Warwick
Owner-occupied	1-bedroom	2%	2%	2%	2%	3%	3%
	2-bedrooms	21%	19%	21%	20%	19%	22%
	3-bedrooms	60%	55%	57%	49%	40%	43%
	4+-bedrooms	17%	24%	20%	29%	38%	32%
	Total	100%	100%	100%	100%	100%	100%
Social rented	1-bedroom	34%	26%	33%	30%	20%	31%
	2-bedrooms	34%	34%	31%	34%	44%	37%
	3-bedrooms	29%	37%	33%	33%	32%	29%
	4+-bedrooms	4%	3%	3%	3%	4%	3%
	Total	100%	100%	100%	100%	100%	100%
Private rented	1-bedroom	14%	14%	14%	17%	15%	22%
	2-bedrooms	37%	37%	39%	39%	41%	42%
	3-bedrooms	37%	39%	40%	33%	30%	22%
	4+-bedrooms	12%	10%	7%	11%	14%	14%
	Total	100%	100%	100%	100%	100%	100%

Source: Census (2011)

Overview of Methodology

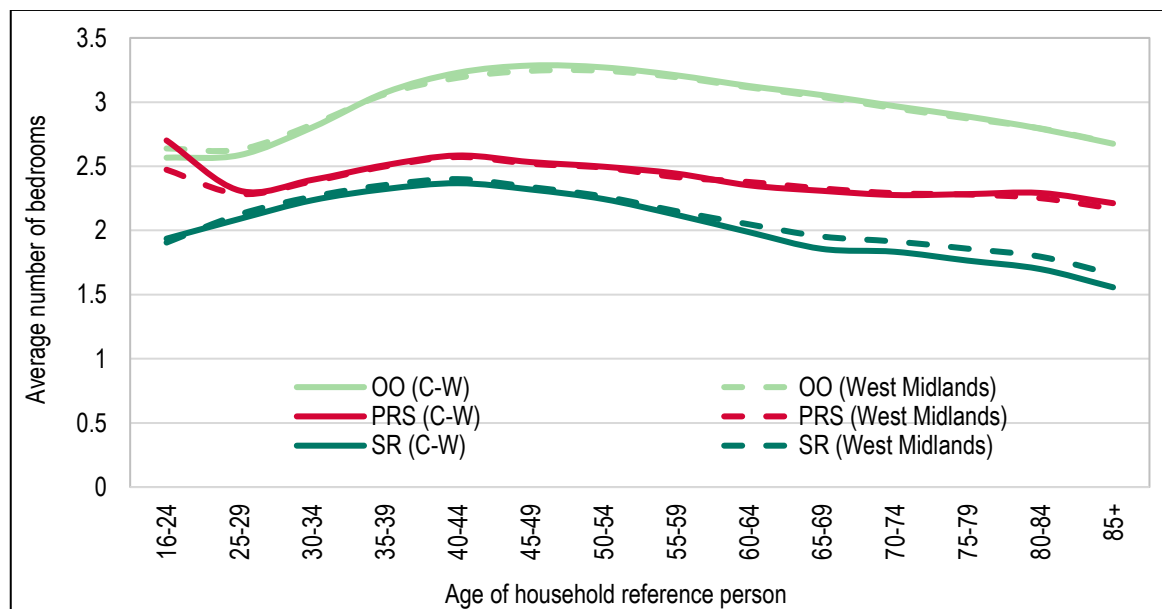
- 12.11 The method to consider future housing mix looks at the ages of the Household Reference Persons and how these are projected to change over time. The sub-sections to follow describe some of the key analysis.

Understanding How Households Occupy Homes

- 12.12 Whilst the demographic projections provide a good indication of how the population and household structure will develop, it is not a simple task to convert the net increase in the number of households into a suggested profile for additional housing to be provided. The main reason for this is that in the market sector, households are able to buy or rent any size of property (subject to what they can afford) and therefore knowledge of the profile of households in an area does not directly transfer into the sizes of property to be provided.
- 12.13 The size of housing which households occupy relates more to their wealth and age than the number of people they contain. For example, there is no reason why a single person cannot buy (or choose to live in) a 4-bedroom home as long as they can afford it, and hence projecting an increase in single person households does not automatically translate into a need for smaller units.
- 12.14 That said, issues of supply can also impact occupancy patterns, for example it may be that a supply of additional smaller bungalows (say 2-bedrooms) would encourage older people to downsize but in the absence of such accommodation these households remain living in their larger accommodation.
- 12.15 The issue of choice is less relevant in the affordable sector (particularly since the introduction of the social sector size criteria) where households are allocated properties which reflect the size of the household, although there will still be some level of under-occupation moving forward with regard to older person and working households who may be able to under-occupy housing (e.g. those who can afford to pay the spare room subsidy ('bedroom tax')).
- 12.16 The approach used is to interrogate information derived in the projections about the number of household reference persons (HRPs) in each age group and apply this to the profile of housing within these groups. The data for this analysis has been formed from a commissioned table by ONS (Table CT0621 which provides relevant data for all local authorities in England and Wales from the 2011 Census).
- 12.17 The figure below shows an estimate of how the average number of bedrooms varies by different ages of HRP and broad tenure group for Coventry-Warwickshire and the West Midlands. In the owner-occupied sector the average size of accommodation rises over time to typically reach a peak around the age of 45-50; a similar pattern (but with smaller dwelling sizes and an earlier peak) is

seen in both the social and private rented sector. After peaking, the average dwelling size decreases – as typically some households downsize as they get older.

Figure 12.3 Average Bedrooms by Age and Tenure in Coventry-Warwickshire and the West Midlands



Source: Census (2011)

12.18 Replicating the existing occupancy patterns at a local level would however result in the conclusions being skewed by the existing housing profile. On this basis a further model has been developed that applies regional occupancy assumptions for the West Midlands region. Assumptions are applied to the projected changes in Household Reference Person by age discussed below.

12.19 The analysis has been used to derive outputs for three broad categories. These are:

- **Market Housing** – which is taken to follow the occupancy profiles in the owner-occupied sector;
- **Affordable Home Ownership** – which is taken to follow the occupancy profile in the private rented sector (this is seen as reasonable as the Government’s desired growth in home ownership looks to be largely driven by a wish to see households move out of private renting); and
- **Rented Affordable Housing** – which is taken to follow the occupancy profile in the social rented sector. The affordable sector in the analysis to follow would include social and affordable rented housing.

Changes to Households by Age

12.20 The table below presents the projected change in households by age of household reference person, this clearly shows particularly strong growth as being expected in older age groups (and to some

extent some younger age groups e.g. those aged up to 29). The number of households headed by someone aged 50-59 is projected to see a small decline over the period studied.

Table 12.5 Projected Change in Household by Age of HRP in Coventry-Warwickshire – trend-based projection

	2022	2032	Change in Households	% Change
16-24	14,994	18,176	3,182	21.2%
25-29	23,540	28,690	5,150	21.9%
30-34	33,791	36,785	2,994	8.9%
35-39	34,159	34,817	658	1.9%
40-44	34,011	37,959	3,948	11.6%
45-49	33,349	35,616	2,266	6.8%
50-54	37,864	34,694	-3,170	-8.4%
55-59	38,059	34,463	-3,596	-9.4%
60-64	32,515	37,322	4,807	14.8%
65-69	28,655	37,100	8,445	29.5%
70-74	29,354	31,396	2,042	7.0%
75-79	25,588	26,011	424	1.7%
80-84	18,169	24,355	6,185	34.0%
85 & over	17,284	21,939	4,655	26.9%
Total	401,332	439,322	37,990	9.5%

Source: Demographic Projections

Initial Modelled Outputs

- 12.21 By following the methodology set out above and drawing on the sources shown, a series of outputs have been derived to consider the likely size requirement of housing within each of the three broad tenures at a local authority level. Analysis takes account of both local and regional occupancy patterns. The data linking to local occupancy will to some extent reflect the role and function of the local area, whilst the regional data will help to establish any particular gaps (or relative surpluses) of different sizes/tenures of homes when considered in a wider context.
- 12.22 The analysis for rented affordable housing can also draw on data from the local authority Housing Register with regards to the profile of need. The data has been taken from the Local Authority Housing Statistics (“LAHS”) and shows a pattern of need which is focussed on 1- and 2-bedroom homes but also showing approaching a quarter of households as requiring 3+- bedroom homes (over a third in Nuneaton & Bedworth).

Table 12.6 Breakdown of Housing Register by Current Bedroom Need, 2021

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	45%	30%	19%	6%
North Warwickshire	38%	38%	20%	4%
Nuneaton & Bedworth	22%	37%	35%	7%
Rugby	52%	19%	13%	16%
Stratford-on-Avon	57%	32%	9%	3%
Warwick	63%	24%	10%	4%
Warwickshire	50%	31%	15%	4%
Coventry-Warwickshire	47%	30%	17%	5%

Source: Local Authority Housing Statistics, 2020

- 12.23 The table below shows the modelled outputs of need by dwelling size in the three broad tenures. The table is provided by linking to local and regional occupancy patterns with the data taking an average of the two positions.

Table 12.7 Modelled Mix of Housing by Size and Tenure in Coventry-Warwickshire

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	3%	26%	54%	18%
Affordable home ownership	18%	40%	31%	11%
Affordable housing (rented)	32%	35%	30%	3%

Source: Housing Market Model

Adjustments for Under-Occupation and Overcrowding

- 12.24 The analysis above sets out the potential need for housing if occupancy patterns remained the same as they were in 2011 (with differences from the current stock profile being driven by demographic change). It is however worth also considering that the 2011 profile will have included households who are overcrowded (and therefore need a larger home than they actually live in) and also those who under-occupy (have more bedrooms than they need).
- 12.25 Whilst it would not be reasonable to expect to remove all under-occupancy (particularly in the market sector) it is the case that in seeking to make the most efficient use of land it would be prudent to look to reduce this over time. Indeed, in the future there may be a move away from current (2011) occupancy patterns due to affordability issues (or eligibility in social rented housing) as well as the type of stock likely to be provided (potentially a higher proportion of flats). Further adjustments to the modelled figures above have therefore been made to take account of overcrowding and under-occupancy (by tenure).
- 12.26 The table below shows a cross-tabulation of a household's occupancy rating and the number of bedrooms in their home (for owner-occupiers), in particular, this shows a higher number of households with at least 2 spare bedrooms who are living in homes with 3 or more bedrooms. There are also a small number of overcrowded households. Overall, in the owner-occupied sector in 2011,

there were 205,200 households with some degree of under-occupation and just 4,600 overcrowded households. For clarity the figure used in the tables below are:

- +2 – household has two or more spare bedrooms
- +1 – household has one spare bedroom
- 0 – household has the same number of bedrooms as required for family members
- -1 – household is overcrowded with one bedroom too few
- -2 – household is overcrowded with at least two bedroom too few

Table 12.8 Cross-tabulation of occupancy rating and number of bedrooms (owner-occupied sector) – Coventry-Warwickshire

Occupancy rating	Number of bedrooms				
	1-bed	2-bed	3-bed	4+-bed	TOTAL
+2	0	0	70,660	47,493	118,153
+1	0	39,239	37,507	10,328	87,074
0	4,850	9,674	15,772	2,251	32,547
-1	312	1,243	1,959	393	3,907
-2	104	163	304	102	673
TOTAL	5,266	50,319	126,202	60,567	242,354

Source: Census (2011)

12.27 For completeness the tables below show the same information for the social and private rented sectors. In both cases there are more under-occupying households than overcrowded, but differences are less marked than seen for owner-occupied housing.

Table 12.9 Cross-tabulation of occupancy rating and number of bedrooms (social rented sector) – Coventry-Warwickshire

Occupancy rating	Number of bedrooms				
	1-bed	2-bed	3-bed	4+-bed	TOTAL
+2	0	0	5,183	499	5,682
+1	0	9,392	5,204	732	15,328
0	15,423	8,097	5,139	468	29,127
-1	1,043	1,284	934	57	3,318
-2	132	135	107	9	383
TOTAL	16,598	18,908	16,568	1,764	53,838

Source: Census (2011)

Table 12.10 Cross-tabulation of occupancy rating and number of bedrooms (private rented sector) – Coventry-Warwickshire

Occupancy rating	Number of bedrooms				TOTAL
	1-bed	2-bed	3-bed	4+-bed	
+2	0	0	8,683	2,692	11,375
+1	0	14,461	6,662	3,391	24,514
0	8,838	8,581	4,885	1,016	23,320
-1	1,137	1,254	969	199	3,559
-2	160	221	202	54	637
TOTAL	10,135	24,517	21,402	7,351	63,405

Source: Census (2011)

- 12.28 In using this data in the modelling an adjustment is made to move some of those who would have been picked up in the modelling as under-occupying into smaller accommodation. Where there is under-occupation by 2 or more bedrooms, the adjustment takes 25% of this group and assigns to a '+1' occupancy rating and a further 12.5% (i.e. an eighth) to a '0' rating. For households with one spare bedroom, 12.5% are assigned to a '0' rating (with the others remaining as '+1'). These do need to be recognised as assumptions, but can be seen to be reasonable as they do retain some degree of under-occupation (which is likely) but does also seek to model a better match between household needs and the size of their home. For overcrowded households a move in the other direction is made, in this case households are moved up as many bedrooms as is needed to resolve the problems.
- 12.29 The adjustments for under-occupation and overcrowding lead to the suggested mix as set out in the following table. It can be seen that this tends to suggest a smaller profile of homes as being needed (compared to the initial modelling) with the biggest change being in the market sector – which was the sector where under-occupation is currently most notable.

Table 12.11 Adjusted Modelled Mix of Housing by Size and Tenure – Coventry-Warwickshire

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	10%	37%	41%	12%
Affordable home ownership	21%	43%	27%	10%
Affordable housing (rented)	34%	37%	25%	4%

Source: Housing Market Model (with adjustments)

- 12.30 The tables below show the same outputs for each of the local authorities. Generally the figures show similar patterns, although there are variations due to the current stock profile, projected future demographic change and levels of over- and under-occupation.

Table 12.12 Adjusted Modelled Mix of Housing by Size and Tenure – Coventry

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	11%	37%	42%	11%
Affordable home ownership	21%	46%	18%	15%
Affordable housing (rented)	32%	38%	25%	5%

Source: Housing Market Model (with adjustments)

Table 12.13 Adjusted Modelled Mix of Housing by Size and Tenure – North Warwickshire

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	10%	41%	43%	6%
Affordable home ownership	23%	36%	34%	7%
Affordable housing (rented)	34%	36%	26%	4%

Source: Housing Market Model (with adjustments)

Table 12.14 Adjusted Modelled Mix of Housing by Size and Tenure – Nuneaton & Bedworth

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	11%	37%	42%	10%
Affordable home ownership	21%	40%	31%	8%
Affordable housing (rented)	37%	33%	25%	4%

Source: Housing Market Model (with adjustments)

Table 12.15 Adjusted Modelled Mix of Housing by Size and Tenure – Rugby

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	8%	31%	44%	17%
Affordable home ownership	20%	38%	32%	11%
Affordable housing (rented)	34%	35%	27%	4%

Source: Housing Market Model (with adjustments)

Table 12.16 Adjusted Modelled Mix of Housing by Size and Tenure – Stratford-on-Avon

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	11%	38%	40%	12%
Affordable home ownership	22%	42%	28%	8%
Affordable housing (rented)	35%	38%	23%	3%

Source: Housing Market Model (with adjustments)

Table 12.17 Adjusted Modelled Mix of Housing by Size and Tenure – Warwick

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	10%	39%	39%	11%
Affordable home ownership	24%	44%	25%	8%
Affordable housing (rented)	35%	36%	25%	4%

Source: Housing Market Model (with adjustments)

Indicative Targets for Different Sizes of Properties by Tenure

12.31 The analysis below provides some indicative targets for different sizes of home (by tenure). The conclusions take account of a range of factors, including the modelled outputs and an understanding of the stock profile in different locations. The analysis (for rented affordable housing) also draws on the Housing Register data as well as taking a broader view of issues such as the flexibility of homes to accommodate changes to households (e.g. the lack of flexibility offered by a 1-bedroom home for a couple looking to start a family).

Social/Affordable Rented Housing

12.32 Bringing together the above, a number of factors are recognised. This includes recognising that it is unlikely that all affordable housing needs will be met and that it is possible that households with a need for larger homes will have greater priority (as they are more likely to contain children). That said, there is also a possible need for 1-bedroom social housing arising due to homelessness (typically homeless households are more likely to be younger single people); that said this group might also be expected to need other forms of accommodation (e.g. foyer or supported housing). In taking any recommendations forward, the Councils will therefore need to consider any specific issues in their local area.

12.33 As noted, the conclusions also consider the Housing Register, but recognises that this will be based on a strict determination of need using the bedroom standard; there will be some households able to afford a slightly larger home or who can claim benefits for a larger home than they strictly need (i.e. are not caught by the spare room subsidy ('bedroom tax') – this will include older person households). The conclusions also take account of the current profile of housing in this sector (which for example shows a varying proportion of 1-bedroom homes in the current stock across areas).

12.34 In taking account of the modelled outputs, the Housing Register and the discussion above, it is suggested that the following mix of social/affordable rented housing (which is close to the modelled outputs) would be appropriate.

Table 12.18 Suggested Mix of Social/Affordable Rented Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	30%	35%	25%	10%
North Warwickshire	30%	35%	25%	10%
Nuneaton & Bedworth	25%	35%	30%	10%
Rugby	35%	30%	20%	15%
Stratford-on-Avon	40%	35%	20%	5%
Warwick	40%	35%	20%	5%
Warwickshire	35%	35%	20%	10%
Coventry-Warwickshire	35%	35%	20%	10%

Source: Conclusions drawn on a variety of sources

Affordable Home Ownership

- 12.35 In the affordable home ownership and market sectors a profile of housing that closely matches the outputs of the modelling is suggested (with some adjustments to take account of student households in Coventry). It is considered that the provision of affordable home ownership should be more explicitly focused on delivering smaller family housing for younger households. Based on this analysis, it is suggested that the following mix of affordable home ownership would be appropriate, and it can be noted that there really is very little difference in the recommendations across areas.
- 12.36 It can be seen that the profile of housing in this sector is generally for slightly larger homes than for the social/affordable rented sector – this will in part reflect the fact that some degree of under-occupation would be allowed in such homes. For 1-bedroom units, it needs to be recognised that the figures are driven by the modelling linked to demographic change; again Councils may need to consider if the figures are appropriate on a local context. For example, in some areas Registered Providers find difficulties selling 1-bedroom affordable home ownership homes and therefore the 1-bedroom elements of AHO might be better provided as 2-bedroom accommodation.

Table 12.19 Suggested Mix of Affordable Home Ownership Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	20%	45%	25%	10%
North Warwickshire	20%	40%	30%	10%
Nuneaton & Bedworth	20%	40%	30%	10%
Rugby	20%	40%	30%	10%
Stratford-on-Avon	20%	45%	25%	10%
Warwick	20%	45%	25%	10%
Warwickshire	20%	40%	30%	10%
Coventry-Warwickshire	20%	45%	25%	10%

Source: Conclusions drawn on a variety of sources

Market Housing

- 12.37 Finally, in the market sector, a balance of dwellings is suggested that takes account of both the demand for homes and the changing demographic profile (as well as observations about the current mix when compared with other locations and also the potential to slightly reduce levels of under-occupancy). This sees a slightly larger recommended profile compared with other tenure groups – again there is little variation across areas.

Table 12.20 Suggested Mix of Market Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	10%	40%	40%	10%
North Warwickshire	10%	35%	45%	10%
Nuneaton & Bedworth	10%	35%	45%	10%
Rugby	10%	30%	45%	15%
Stratford-on-Avon	10%	35%	40%	15%
Warwick	10%	40%	40%	10%
Warwickshire	10%	35%	45%	10%
Coventry-Warwickshire	10%	40%	40%	10%

Source: Conclusions drawn on a variety of sources

- 12.38 Although the analysis has quantified this on the basis of the market modelling and an understanding of the current housing market, it does not necessarily follow that such prescriptive figures should be included in the plan making process (although it will be useful to include an indication of the broad mix to be sought across the study area) – demand can change over time linked to macro-economic factors and local supply. Policy aspirations could also influence the mix sought.
- 12.39 The suggested figures can be used as a monitoring tool to ensure that future delivery is not unbalanced when compared with the likely requirements as driven by demographic change in the area. The recommendations can also be used as a set of guidelines to consider the appropriate mix on larger development sites, and the Councils could expect justification for a housing mix on such sites which significantly differs from that modelled herein. Site location and area character are also however relevant considerations the appropriate mix of market housing on individual development sites.

Smaller-area Housing Mix

- 12.40 The analysis above has focussed on overall study area-wide and local authority needs with conclusions very much at the strategic level. It should however be recognised that there will be variations in the need within areas due the different role and function of a location and the specific characteristics of local households (which can also vary over time). This report does not seek to look at smaller-area needs, and this would be best suited to individual projects for local authorities; however, below are some points for consideration when looking at needs in any specific location.
- a) Whilst there will be differences in the stock profile in different locations this should not necessarily be seen as indicating particular surpluses or shortfalls of particular types and sizes of homes;
 - b) As well as looking at the stock, an understanding of the role and function of areas is important. For example, higher priced rural areas are typically sought by wealthier families and therefore such areas would be expected to provide a greater proportion of larger homes;

c) That said, some of these areas will have very few small/cheaper stock and so consideration needs to be given to diversifying the stock;

d) The location/quality of sites will also have an impact on the mix of housing. For example, brownfield sites in the centre of towns may be more suited to flatted development (as well as recognising the point above about role and function) whereas a rural site on the edge of an existing village may be more appropriate for family housing. Other considerations (such as proximity to public transport) may impact on a reasonable mix at a local level.

12.41 The Councils should also monitor what is being built to ensure that a reasonable mix is provided in a settlement overall.

12.42 Additionally, in the affordable sector it may be the case that Housing Register data for a smaller area identifies a shortage of housing of a particular size/type which could lead to the mix of housing being altered from the overall suggested requirement

Built Form

12.43 A final issue is a discussion of the need/demand for different built-forms of homes. In particular this discussion focusses on bungalows and the need for flats vs. houses.

Bungalows

12.44 The sources used for analysis in this report make it difficult to quantify a need/demand for bungalows in the HMA and constituent authorities as Census data (which is used to look at occupancy profiles) does not separately identify this type of accommodation. Data from the Valuation Office Agency (VOA) does however provide estimates of the number of bungalows (by bedrooms) although no tenure split is available.

12.45 The table below shows a notable proportion of homes are bungalows (7% of all flats and houses) with over half of these having 2-bedrooms (and most of the rest having 3-bedrooms); a slightly higher proportion (9%) of homes across England are bungalows.

Table 12.21 Number of dwellings by property type and number of bedrooms (March 2020) – Coventry-Warwickshire

	Number of bedrooms					All
	1	2	3	4+	Not Known	
Bungalow	3,720	14,750	6,600	1,540	130	26,690
Flat/Maisonette	31,450	33,230	2,690	1,870	660	69,890
Terraced house	1,640	40,880	80,250	6,700	520	129,970
Semi-detached house	320	15,670	77,660	8,700	370	102,700
Detached house	140	2,470	26,080	40,840	670	70,200
All flats/houses	37,270	107,000	193,280	59,650	2,350	399,450
Annexe	-	-	-	-	-	560
Other	-	-	-	-	-	1,710
Unknown	-	-	-	-	-	6,260
All properties	-	-	-	-	-	407,990

Source: Valuation Office Agency

12.46 For individual local authorities the proportion of the stock that is bungalows is shown below. Generally across the County, the proportion does not vary much, going from 11.2% in Charnwood, up to 14.0% in Hinckley & Bosworth:

- Coventry – 4.0%;
- North Warwickshire – 8.7%;
- Nuneaton & Bedworth – 7.3%;
- Rugby – 8.9%;
- Stratford-on-Avon – 10.0%;
- Warwick – 6.6%;
- Warwickshire – 8.2%; and
- Coventry-Warwickshire – 6.7%

12.47 In general, discussions with local estate agents find that there is a demand for bungalows and in addition, analysis of survey data (in other locations) points to a high demand for bungalows (from people aged 65 and over in particular).

12.48 Bungalows are often the first choice for older people seeking suitable accommodation in later life and there is generally a high demand for such accommodation when it becomes available (this is different from specialist accommodation for older people which would have some degree of care or support).

12.49 As a new build option, bungalows are often not supported by either house builders or planners (due to potential plot sizes and their generally low densities). There may, however, be instances where bungalows are the most suitable house type for a particular site; for example, to overcome objections about dwellings overlooking existing dwellings or preserving sight lines.

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- 12.50 There is also the possibility of a wider need/demand for retirement accommodation. Retirement apartments can prove very popular if they are well located in terms of access to facilities and services, and environmentally attractive (e.g. have a good view). However, some potential purchasers may find high service charges unacceptable or unaffordable and new build units may not retain their value on re-sale.
- 12.51 Overall, the Councils should consider the potential role of bungalows as part of the future mix of housing. Such housing may be particularly attractive to older owner-occupiers (many of whom are equity-rich) which may assist in encouraging households to downsize. However, the downside to providing bungalows is that they are often relatively land intensive.
- 12.52 Bungalows are likely to see a particular need and demand in the market sector and also for rented affordable housing (for older people as discussed in the next section of the report). Bungalows are likely to particularly focus on 2-bedroom homes, including in the affordable sector where such housing may encourage households to move from larger 'family-sized' accommodation (with 3+-bedrooms).

Flats vs. Houses

- 12.53 Although there are some 1-bedroom houses and 3-bedroom flats, it is considered that the key discussion on built-form will be for 2-bedroom accommodation, where it might be expected that there would be a combination of both flats and houses. At a national level, 81% of all 1-bedroom homes are flats, 35% of 2-bedroom homes and just 4% of homes with 3-bedrooms.
- 12.54 The table below shows (for 2-bedroom accommodation) the proportion of homes by tenure that are classified as a flat, maisonette or apartment in Coventry-Warwickshire and England. This shows a total of 30% of all bedroom homes as flats and would potentially point to the majority of 2-bedroom homes in the future also being houses. The analysis does however show a higher proportion of flats in the social and private rented sectors. It is considered that greater emphasis should be given to mix by dwelling size than type recognising the potential for built-form to vary in different locations.
- 12.55 This analysis is based on considering the current built-form in different tenures. Any decisions about the types of dwelling to be provided will need to take account of factors such as households type of those likely to occupy dwellings (where for example households with children will be more suited to a house than a flat). However, site characteristics may also play a role in deciding the most suitable built-form (e.g. city/town centre developments may be more suited to flats).

Table 12.22 Proportion of 2-bedroom homes that are a flat, maisonette or apartment (by tenure)

	Owner-occupied	Social rented	Private rented	All (2-bedroom)
Coventry	21%	51%	42%	34%
North Warwickshire	9%	18%	27%	15%
Nuneaton & Bedworth	10%	42%	37%	21%
Rugby	13%	33%	38%	23%
Stratford-on-Avon	17%	33%	34%	25%
Warwick	28%	58%	59%	43%
Warwickshire	17%	39%	43%	28%
Coventry-Warwickshire	18%	44%	43%	30%
England	21%	48%	50%	35%

Source: 2011 Census

- 12.56 As noted, this analysis would suggest that most 2-bedroom homes should be built as houses (or bungalows) rather than flats. However, any decisions will still have to take account of site characteristics, which in some cases might point towards flatted development as being most appropriate. The analysis would suggest that the affordable sector might be expected to see a higher proportion of flats than for market housing, although it is still the case that houses are likely to make up the majority of the need in this sector.

Summary

- 12.57 The proportion of households with dependent children is similar to the regional and national average with around 30% of all households containing dependent children in 2011. There is limited variation in the proportion of households with children across areas, although it is notably that the City has a greater proportion of parents.
- 12.58 There are a range of factors which will influence demand for different sizes of homes, including demographic changes; future growth in real earnings and households' ability to save; economic performance and housing affordability. The analysis linked to demographic change concludes that the following represents an appropriate mix of affordable and market homes for new development, this takes account of both household changes and the ageing of the population – the analysis also models for there to be a modest decrease in levels of under-occupancy (which are particularly high in the market sector).

Table 12.23 Suggested Mix of Housing by Size and Tenure – Coventry-Warwickshire

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	10%	40%	40%	10%
Affordable home ownership	20%	45%	25%	10%
Affordable housing (rented)	35%	35%	20%	10%

Source: Derived from Housing Market Model

-
- 12.59 The strategic conclusions in the affordable sector recognise the role which delivery of larger family homes can play in releasing a supply of smaller properties for other households. Also recognised is the limited flexibility which 1-bed properties offer to changing household circumstances, which feed through into higher turnover and management issues. The conclusions also take account of the current mix of housing by tenure and also the size requirements shown on the Housing Register.
- 12.60 The mix identified above could inform strategic policies although a flexible approach should be adopted. For example, in some areas Registered Providers find difficulties selling 1-bedroom affordable home ownership homes and therefore the 1-bedroom elements of AHO might be better provided as 2-bedroom accommodation. Additionally, in applying the mix to individual development sites, regard should be had to the nature of the site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level. The Councils should also monitor the mix of housing delivered.
- 12.61 Analysis also suggests that the majority of units should be houses rather than flats, although consideration will need to be given to site specific circumstances (which may in some cases lend themselves to flatted development). Additionally, the Councils should consider the role of bungalows within the mix – such housing can be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into the market.
- 12.62 Based on the evidence, it is expected that the focus of new market housing provision will be on 2- and 3-bed properties. Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2- and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retaining flexibility for friends and family to come and stay.

13. SPECIFIC HOUSING MARKET SEGMENTS

Self and Custom-Build Housebuilding

- 13.1 The Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) (“the 2015 Act”) provides a legal definition of ‘self-build and custom housebuilding’ which is where individuals or associations of individuals (or persons working with or for individuals or associations of individuals) build houses to be occupied as homes for those individuals.
- 13.2 The Government has long had a clear agenda for supporting and promoting the self-build and custom building sector. In *Laying the Foundations: a Housing Strategy for England* (November 2011), the Coalition Government set out plans to enable more people to build or commission their own home.
- 13.3 The Housing and Planning Act 2016 (“the 2016 Act”), which received Royal Assent on 12th May 2016, formally introduced the ‘Right to Build’ at Chapter 2. This 2016 Act required local planning authorities to set up a register of people wanting to undertake a custom or self-build project in their area. Under the ‘duty to grant planning permissions etc.’, the 2016 Act has placed a legal duty on the relevant authority to grant enough planning permissions to meet the demand for self-build housing as identified through its register in each base period. The Self-Build and Custom Housebuilding Regulations 2016 subsequently came into force on 31st October 2016, amending the 2015 Act and implementing Chapter 2 of the 2016 Act.
- 13.4 In the Government’s Housing White Paper²⁶ (paragraph 3.14) in January 2017, the commitment to support the self-build and custom housebuilding sector was reasserted, the Government stating that “*alongside smaller firms, the Government wants to support the growth of custom built homes*” in recognition of the fact that custom build homes are generally built more quickly, built to a higher quality and tend to use more productive and modern methods of construction.
- 13.5 In addition, the Government highlighted that “*fewer homes are custom built in England than many other countries, but there is evidence of more demand for them including from older people*”. According to successive Ipsos MORI polls at the time of the Paper’s publication, more than a million people across the UK expected to buy a building plot, secure planning permission or start/complete construction work on their new home.
- 13.6 On the other side of the argument however, the Government (paragraph 3.15) did acknowledge that there are barriers to self-build and custom housebuilding, including access to finance – as “*mortgages for custom and self-built homes represent a very small proportion of the overall lending*

²⁶ Fixing our Broken Housing Market (DCLG, February 2017)

market”; the planning process and variations to local authority approaches and crucially, land supply and procurement.

- 13.7 The Government has continued to express support for the self-build and custom housebuilding sector through the more recent White Paper: Planning for the Future which was consulted on during August 2020 to October 2020.
- 13.8 On 21st August 2021, an independent review by Richard Bacon MP into scaling up self-build and custom housebuilding was published. The review recognises and champions the benefits of self-build housing including boosting overall housing delivery, increasing choice in the market and delivering homes which are generally high-quality. The report sets out a number of recommendations including raising awareness of the Right to Build, strengthening current legislation and supporting planning reforms to maximise the opportunities for self-build housing.
- 13.9 The Bacon Review and the recommendations set out therein recognise the challenges associated with delivering serviced plots as well as the self and custom build homes on those plots; however, there is also recognition that the UK “lags far behind other developed countries”. This includes land assembly and infrastructure (i.e. other countries have a more developed land assembly function); planning (zoned land to build whatever is permitted); SME builders (housing delivered by local builders) and delivery at scale (self and custom build homes delivered on both small and large sites).

Self and Custom Build Registers

- 13.10 As of 1st April 2016, and in line with the 2015 Act and the Right to Build, relevant authorities in England are required to have established and publicised a self-build and custom housebuilding register which records those seeking to acquire serviced plots of land in the authority’s area in order to build their own self-build and custom houses.
- 13.11 All of the local authorities in the study area introduced a Self-Build and Custom Housebuilding Register on 1st April 2016 in line with the requirements of legislation. In terms of confirmed monitoring data, there has now been five full base periods up to 30th October 2020.
- 13.12 Across the study area, only Warwick District has introduced a local connections test. They have also implemented a charge for entry onto the register which again is the only local authority in the study area to do so. The impact of which has severely reduced the number of entries onto the register.
- 13.13 Each Council is required to grant sufficient planning permissions to meet the demand identified on the Register as per the 2015 Act (as amended) and must have regard to the entries when carrying out their planning, housing, land disposal and regeneration functions. If assessed over the five base periods, there has been an average of 155 registered expressions of interest in a serviced plot of land and a total of 774 entries.

- 13.14 The Table below provides a base period and local authority breakdown of those individuals who have expressed demand for serviced plots of land in Coventry and Warwickshire. Despite the introduction of a local connection test and fee in Warwick it remains on average the most popular local authority for this type of development although this might not be sustained.

Table 13.1 Serviced Plot Demand by Base Period in Coventry and Warwickshire

Base Period:	1	2	3	4	5	Total	Average
Coventry	0	3	7	2	18	30	6
North Warwickshire	7	4	3	7	4	25	6
Nuneaton & Bedworth	0	4	2	8	3	17	4
Rugby	13	29	29	20	22	113	25
Stratford-on-Avon	39	48	22	44	18	171	38
Warwick	109	110	95	95	9	418	93
Total	168	198	158	176	74	774	155

Source: Right to Build Registers Monitoring

- 13.15 It is worth highlighting that a survey²⁷ undertaken by YouGov on behalf of the National Custom and Self-Build Association (“NaCSBA”) in October 2020 found that awareness of the Right to Build legislation is low with 83% of people unaware that the local authority self-build registers exist. As a result, the number of individuals on a local authority’s self-build register may underestimate demand. On the other hand, it is also noted that individuals can choose to join more than one authority’s register which could result in an element of double counting.

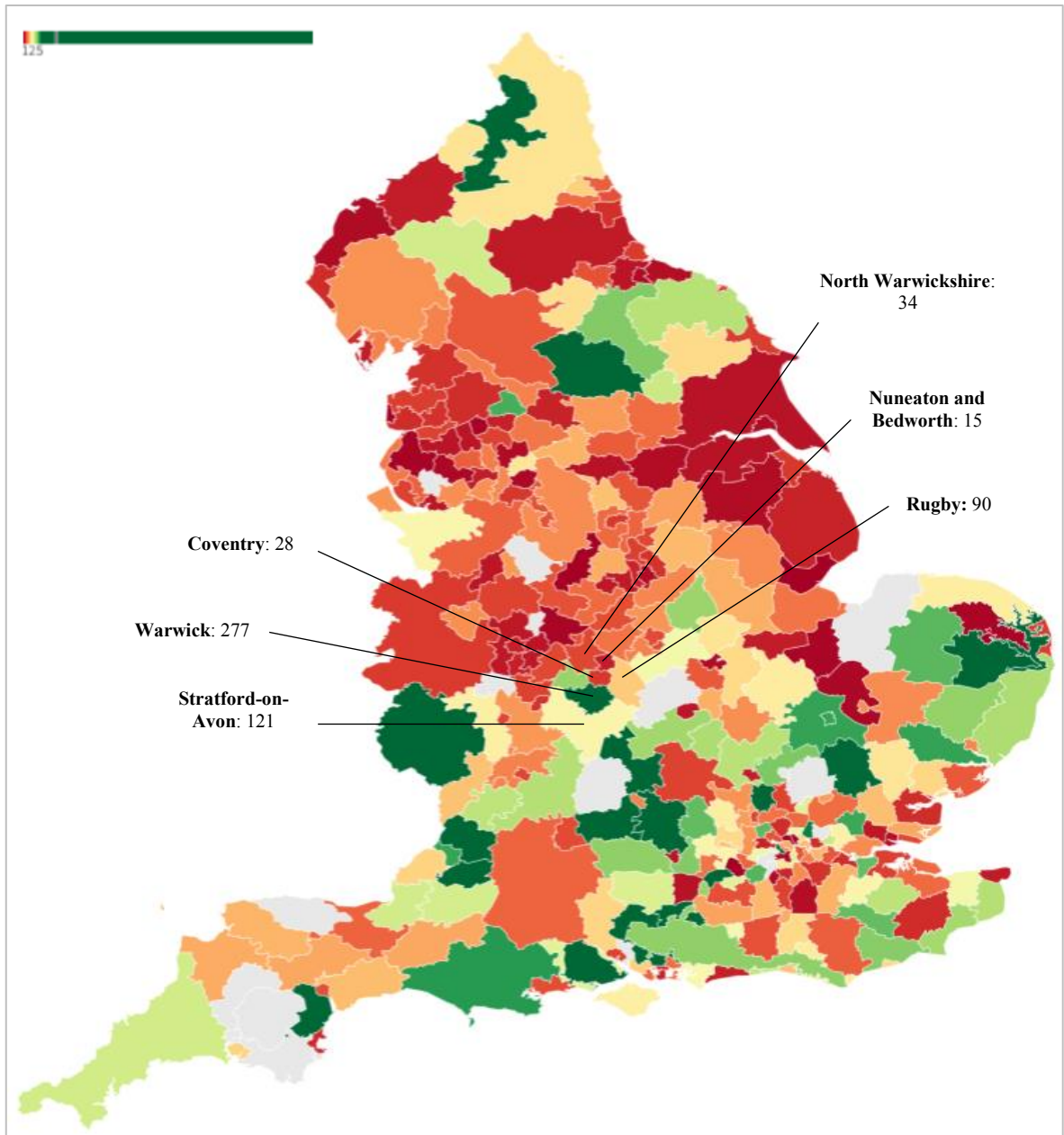
Broader Demand Evidence

- 13.16 In order to supplement the data from the Council’s own register, we have looked to secondary sources as recommended by the PPG, which for this report is data from NaCSBA - the national association for the custom and self-build housing sector.
- 13.17 First, it is worth highlighting that the recent October 2020 survey undertaken by YouGov on behalf of NaCSBA found that 1 in 3 people (32%) are interested in building their own home at some point in the future, including 12% who said they were very interested. Notably, almost half (48%) of those aged between 18 and 24 were interested in building their own home, compared to just 18% of those aged 55 and over. This is notable as, traditionally, self-build has been seen as the reserve of older members of society aged 55 and over, with equity in their property
- 13.18 Second, we can draw on NaCSBA data to better understand the level of demand for serviced plots across Coventry and Warwickshire in relative terms. The association has recently published analysis

²⁷ A survey of 2,017 adults with fieldwork undertaken online between 9th – 11th October 2020. The figures are weighted and are representative of all GB adults aged 18+

with supporting maps and commentary titled “Mapping the Right to Build” in 2019. This includes an output on the demand for serviced plots as a proportion of total population relative to all other local authorities across England. One of the key maps within the report highlights the areas of strongest demand and this is shown in the Figure below.

Figure 13.1: Overall Demand for Self-Build Plots per 100,000 of Population, 2019 Registers²⁸



Source: NaCSBA “Mapping the Right to Build”, 2020.

²⁸ N.B. the data for Coventry does not reflect the revised data set out in Table 2.1 which has been amended to correct previous inaccuracies.

13.19 The map reflects register data from local authorities across the country with Warwick and Stratford showing the greatest demand. The data which sits behind the map states that demand ranges from 277 persons per 100,000 in Warwick and 121 in Stratford-on-Avon to 15 in Nuneaton and Bedworth.

Supporting the Self-Build and Custom Housebuilding

13.20 It is clear that there is demand for self-build and custom housebuilding serviced plots of land across Coventry and Warwickshire – particularly to the south of the study area.

13.21 The Self-Build and Custom Housebuilding PPG sets out how authorities can increase the number of planning permissions which are suitable for self-build and custom housebuilding and support the sector. The PPG²⁹ is clear that authorities should consider how local planning policies may address identified requirements for self and custom housebuilding to ensure enough serviced plots with suitable permission come forward and can focus on playing a key role in facilitating relationships to bring land forward.

13.22 There are a number of measures which can be used to do this, including but not limited to:

- supporting Neighbourhood Planning groups where they choose to include self-build and custom build housing policies in their plans. There is already evidence of this in the area (e.g. in the Kenilworth Neighbourhood Plan³⁰);
- working with Homes England to unlock land and sites in wider public ownership to deliver self-build and custom build housing; and
- when engaging with developers and landowners who own sites that are suitable for housing, encouraging them to consider self-build and custom housebuilding, and facilitating access to those on the register where the landowner is interested;
- working with local partners, such as Housing Associations and third sector groups, to custom build affordable housing for veterans and other groups in acute housing need.

13.23 Icenl would note that an increasing number of local planning authorities have adopted specific self-build and custom housebuilding policies in respective Local Plans to encourage delivery, promote and boost housing supply. There are also a number of appeal decisions in the context of decision-taking which have found that paragraph 11(d) of the Framework is engaged in the absence of specific policy on self-build housing when this is the focus of a planning application.

²⁹ Paragraph: 025 Reference ID: 57-025-20210508

³⁰ The Neighbourhood Plan includes a 5% requirement for self-build housing on certain sites

The Policy Response

- 13.24 A specific policy would typically express support for self-build and custom housebuilding. Icenl recognises that all of the local authorities in the study area have such a Local Plan policy (or Draft Local Plan policy in the case of Stratford-on-Avon) supporting Self and Custom Build. In addition to a specific policy, the authorities of Rugby, Stratford-on-Avon and Warwick have also produced an SPG.
- 13.25 Some areas also require that a minimum proportion of plots within development schemes (often over a certain size) are offered to self-builders or as custom-build plots and/or allocation of sites solely for the use. This is often known as the “Teignbridge Rule” after the first District Council to adopt the first self-build policy. In this instance, 5% of all developable housing land is allocated for custom and self-build on larger sites. This policy has a fallback mechanism – if plot(s) have been made available and marketed for at least 12 months and not sold, the plot(s) may either remain on the open market as custom build or be offered to the Council or a Housing Association before being built out by the developer.
- 13.26 An assessment³¹ of all Local Plans in England in August 2019 by the Right to Build Taskforce found that 21% of post-legislation Local Plans offered support through a ‘percentage’ policy based on the Teignbridge rule. In addition, around 28% of Local Plans offered support through a mix of policies identifying opportunities; 28% offered support through land allocations and 25% offered support through affordable housing policies.
- 13.27 At present, the local authorities do not have a policy which seeks a percentage of self and custom build housing on larger sites which could enable a greater number of serviced plots to come forward in each area at pace. Stratford-on-Avon has specifically supported delivery of self and custom build within the Gaydon/Lighthorne Heath allocation which serves as a strong example in the study area – the Right to Build Taskforce has labelled this policy as “ambitious” in a positive sense. There are no specific allocations in any of the Local Plans for serviced plots.
- 13.28 Icenl consider that in order to respond to demand in the sector, and in response to the PPG’s requirements, the Councils - particularly those in South Warwickshire where demand is greatest - should continue to express active support self and custom build homes but should also seek a percentage of self and custom build on larger sites with an appropriate fallback mechanism should plots fail to sell; consider opportunities to identify specific sites for serviced plots (i.e. on public sector land, where available) and encourage developers as part of the overall housing mix to incorporate serviced plots where there is evidence of strong demand.

³¹ Assessment of all Local Plans in England, Right to Build Task Force, August 2019 [unpublished]

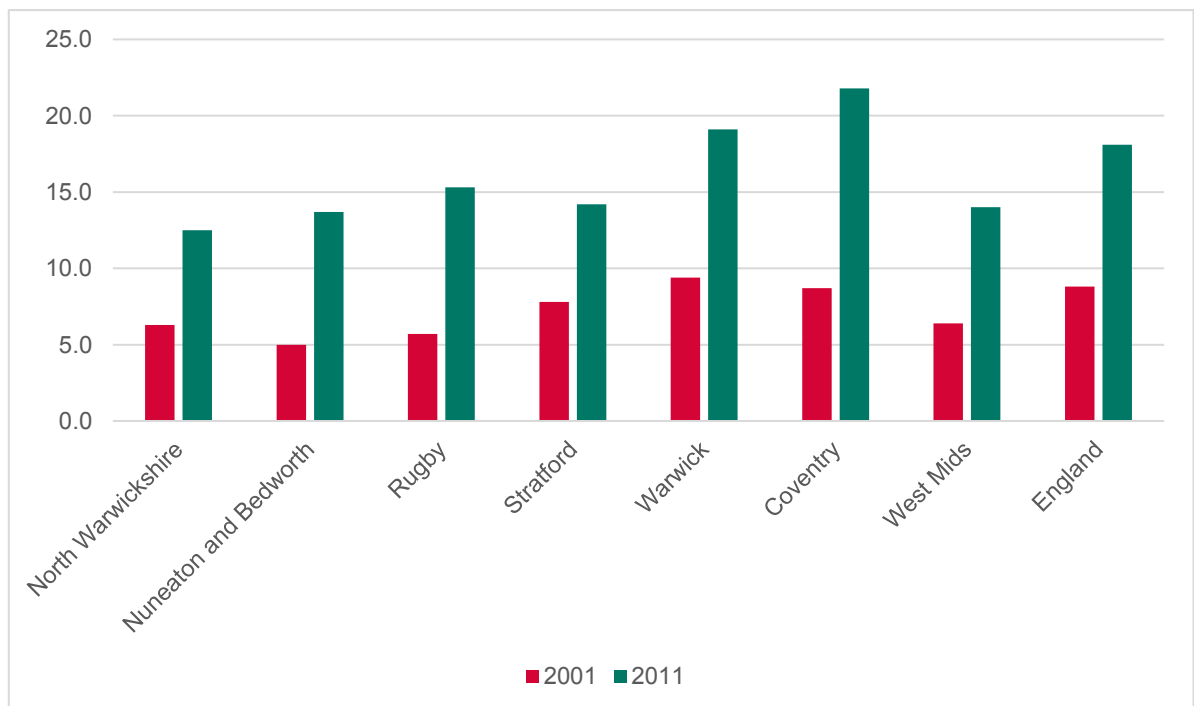
Private Rented Sector

13.29 As a starting point, it is important to consider the profile of renters living in the area, the size of the private rented sector and dynamics associated with values and affordability.

The Size of the Sector

13.30 In Coventry & Warwickshire, the growth in the private rented sector was strong over the last two census points outperforming the national trend between 2001-11. The Figure below shows how the private rented sector changed. The sector is of significant scale and proportion in Warwick District and Coventry District with over a fifth of households (22%) living in the PRS in Coventry; which partly reflects its City status. Over 10,500 households lived in the sector in Warwick in 2011 with over 26,500 households living in the sector in Coventry.

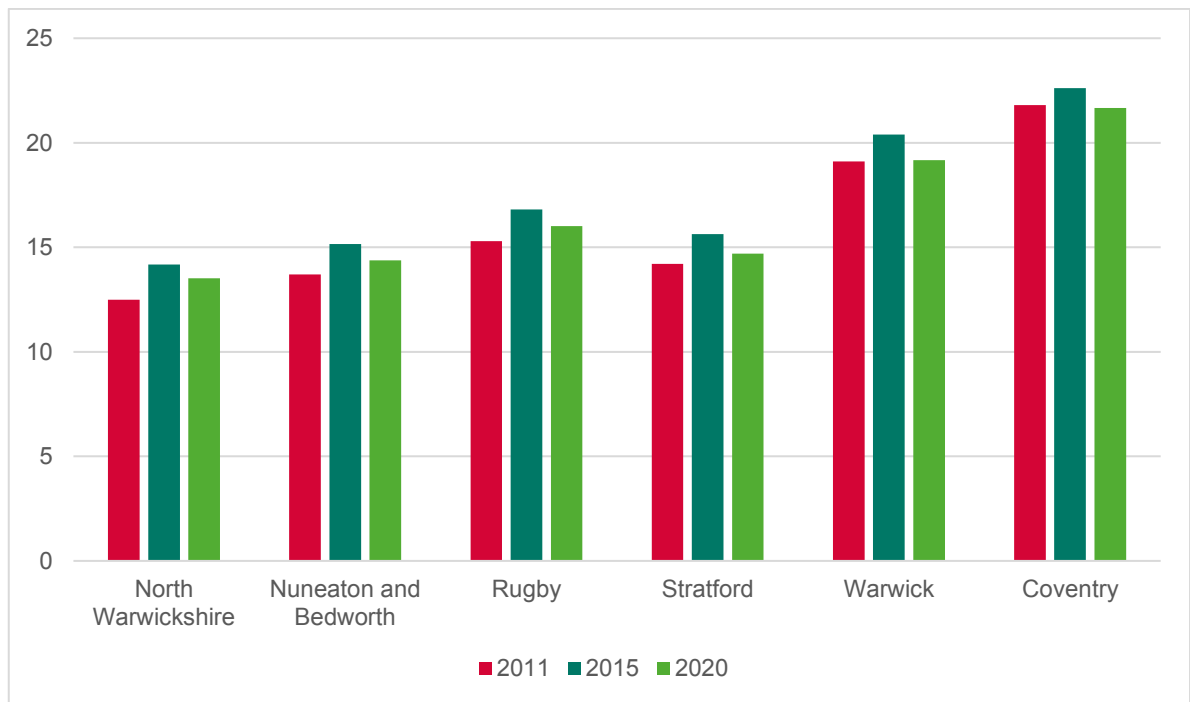
Figure 13.2: Growth in the Private Rented Sector, 2001-2011 (% Proportion)



13.31 In order to bring this up to date, IcenI has drawn on data published by ONS which provides a view on how the tenure profile may have evolved since the 2011 Census. It should be caveated that the confidence value varies greatly by authority and the data is therefore only intended to provide a broad view on the potential tenure profile. Clearly as the Census 2021 data begins to emerge, we will have a clearer understanding of the true picture.

13.32 Bearing this in mind, the Figure below shows how the tenure profile could have changed across the study area over the period from 2011 to 2015 to 2020. As is clear, the proportion of households living in the private rented sector increased notably in 2015 in all authority areas, but the proportion has decreased over the period to 2020.

Figure 13.3: Potential Change in Tenure Profile, PRS, 2011-2020



13.33 This aligns with the national picture with the latest English Housing Survey³² stating that the proportion of households in the private rented sector decreased over the period 2015/16 to 2020/21. In England in 2020/21, the private rented sector accounted for 19% of all households down from 20% in 2015/16 with private renting more prevalent in London (27% of all households) compared to the rest of England (17%).

13.34 Regardless, it is clear that overall, the sector has grown substantially over the last two decades and continues to play a key role in the market, particularly in Coventry City and Warwick District where the size of the sector is notably above the national average outside of London.

The Profile of Renters

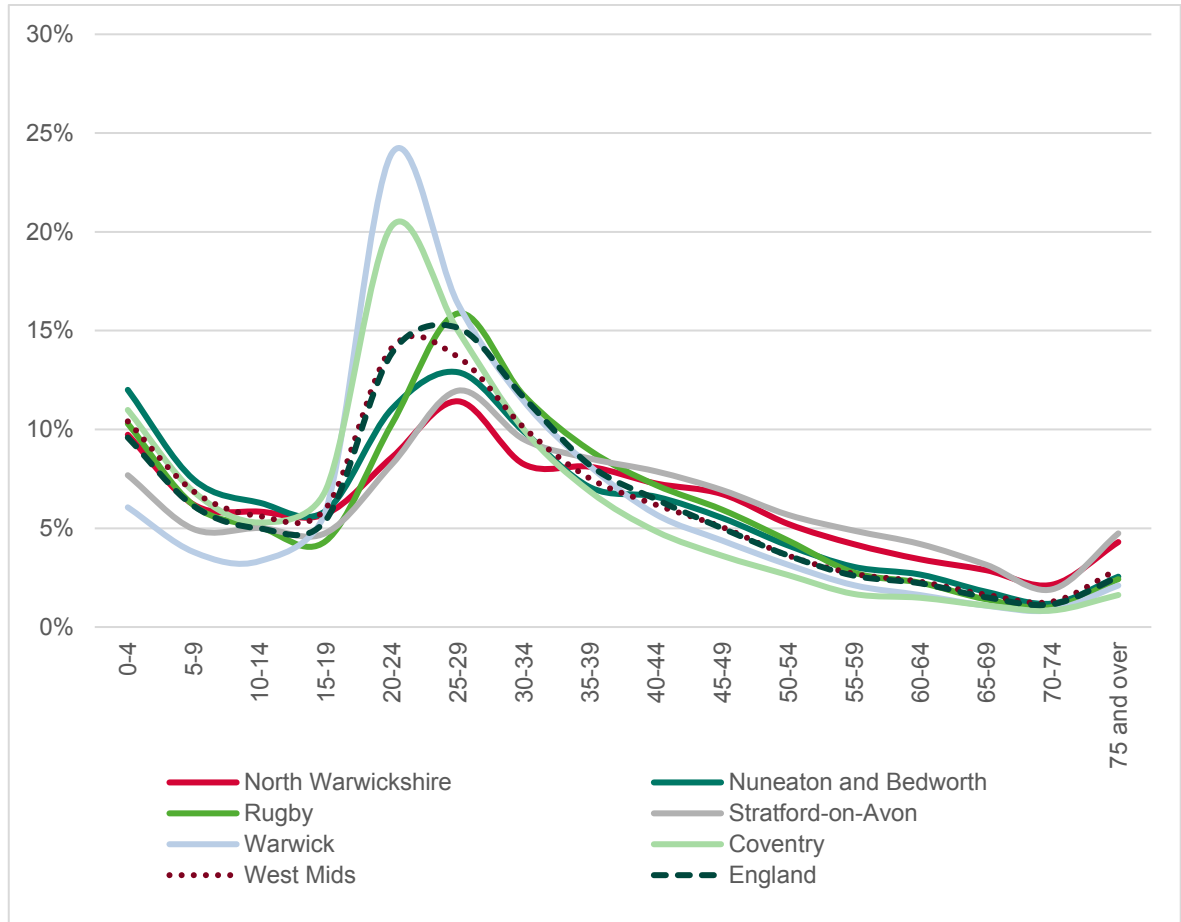
13.35 As is shown in the Figure below, the age of those renting at the point of the 2011 Census across the study area was skewed towards those aged 20 to 39 in line with the regional and national average. In North Warwickshire and Stratford-on-Avon, there was a higher proportion of those aged 40 and over whereas in Warwick and Coventry, the proportion of households in their 20s was significantly higher – reflecting the large student population in both areas.

13.36 In Warwick District and Coventry City, 40% and 35% of private renters were aged in their 20s respectively - significantly higher than the national average of 29% and all other Districts. The main

³² English Housing Survey 2020/21

difference between Coventry and Warwick was the notable proportion of younger children aged 14 and under in the former (23% of households) compared with the latter (13% of households).

Figure 13.4: Age Profile of Private Rented Sector Tenants, Coventry & Warwickshire



Source: 2011 Census

- 13.37 Turning to household composition, the Table below identifies the profile of each household living in the private rented sector and how this varies across the study area. Across the board, the analysis shows that the largest household group was single person households aged under 65 accounting for over a quarter (28%) of all households on average which is typical of the private rented sector profile.
- 13.38 There are however clear variances between each authority area. In Warwick District, over a third (34%) of private renters were singles aged under 65 with Coventry City having the lowest proportion; although, it should be noted that Coventry had the highest number of younger single households in absolute terms. In both areas, full-time students account for around a tenth of private renting households with a high proportion of lone parents with children also living in the sector in Coventry.

Table 13.2 Household Composition of Private Renters (%)

	North Warwickshire	Nuneaton & Bedworth	Rugby	Stratford-on- Avon	Warwick	Coventry
One Person Aged 65+	6%	4%	3%	7%	3%	3%
One Person Aged <65	27%	29%	29%	27%	34%	26%
Couple Aged 65+	3%	1%	1%	3%	1%	1%
Couple No Children	18%	15%	20%	21%	20%	11%
Couple Dep. Children	19%	20%	19%	18%	11%	16%
Couple Non-Dep.	3%	2%	2%	3%	1%	1%
Lone Parent Dep.	12%	18%	11%	9%	8%	17%
Lone Parent Non-Dep.	3%	2%	2%	2%	1%	2%
Full-Time Students	0%	0%	0%	0%	9%	10%
Other Households	8%	9%	13%	10%	12%	13%
All Households (No.)	2,913	6,683	5,903	6,596	10,513	26,503

Source: Census 2011

- 13.39 In the Districts outside of Coventry and Warwick, the profile of households in the sector is more focussed towards couples with and without children accounting for between 35% of all households in Nuneaton and Bedworth to 40% in Rugby. In Rugby, in line with Warwick and Coventry, there is also a high proportion of “other households” (including unrelated adults sharing).
- 13.40 In respect of where residents (household reference persons or “HRP”) living in the private rented sector work, the Table below sets out the industries of employment of HRPs in the PRS. This shows that the two main industries of those living in the sector are (1) public administration, education and health as well as (2) distribution and hospitality. In Warwick and Stratford-on-Avon, there is also a strong representation of those working in financial and professional industries. This is also true for Coventry when focussing solely on the significant number of those HRPs working in the industry.

Table 13.3 Industry of Employment of Private Renters

	North Warwickshire	Nuneaton & Bedworth	Rugby	Stratford-on- Avon	Warwick	Coventry
Agriculture, energy and water	5%	3%	2%	5%	3%	2%
Manufacturing	12%	12%	11%	9%	10%	10%
Construction	9%	7%	6%	8%	5%	5%
Distribution and Hospitality	25%	27%	24%	24%	21%	26%
Transport and communication	14%	13%	19%	9%	12%	12%
Financial, Prof and Admin	13%	11%	12%	19%	18%	14%
Admin, education & health	18%	22%	21%	17%	24%	25%
Other	4%	6%	4%	8%	6%	5%

Source: Census 2011

- 13.41 Turning to the occupation of all HRPs living in the PRS, the Table below is clear in showing that there is a high proportion of high skilled, professional households in the sector in Warwick District and Stratford-on-Avon with 57% and 46% of HRPs working in the top three major occupation groups respectively. This compares with only 32% in Coventry City with the area having a much higher proportion of HRPs in low skilled roles in (40% of all households) which is also the case in North Warwickshire, Nuneaton and Bedworth and Rugby.

Table 13.4 Occupation of Private Renters

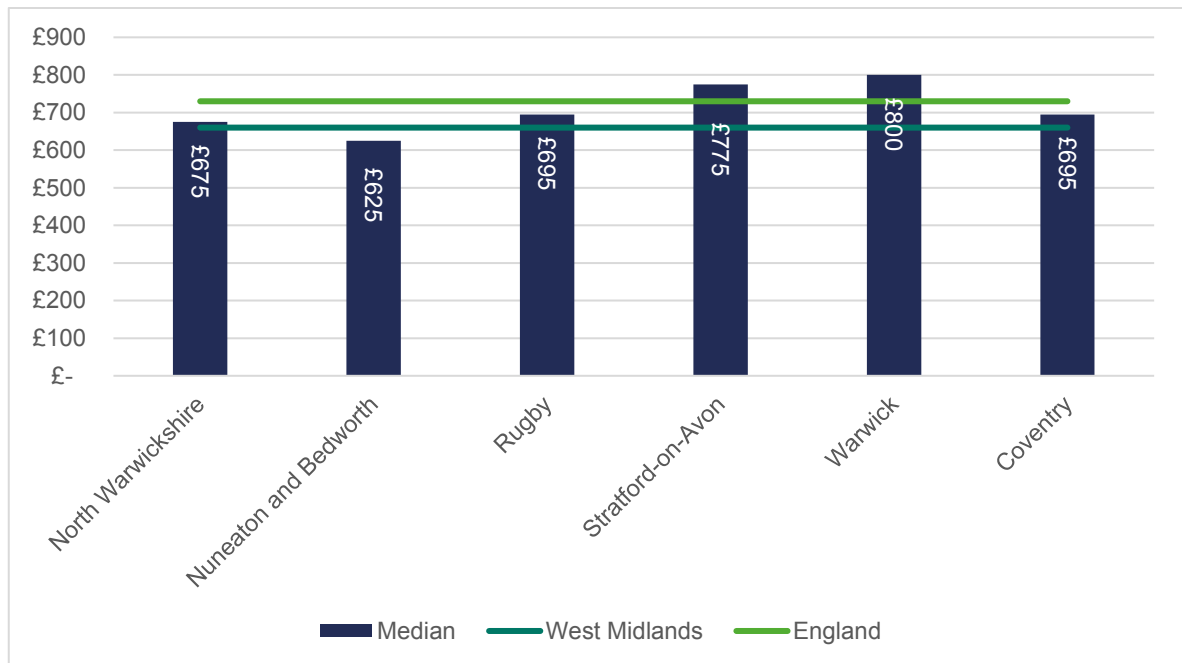
	North Warwickshire	Nuneaton & Bedworth	Rugby	Stratford-on- Avon	Warwick	Coventry
Managers and Directors	11%	9%	10%	16%	12%	6%
Professional	12%	10%	14%	15%	29%	16%
Associate Professional	10%	9%	11%	14%	17%	9%
Admin and Secretarial	8%	9%	9%	8%	8%	9%
Skilled Trades	15%	13%	11%	17%	9%	9%
Caring and Leisure	8%	11%	7%	7%	6%	10%
Sales and Custom Service	6%	8%	5%	5%	6%	10%
Process and Machine	13%	13%	12%	6%	4%	9%
Elementary	16%	19%	22%	10%	9%	20%

Source: Census 2011

Rental Market Statistics

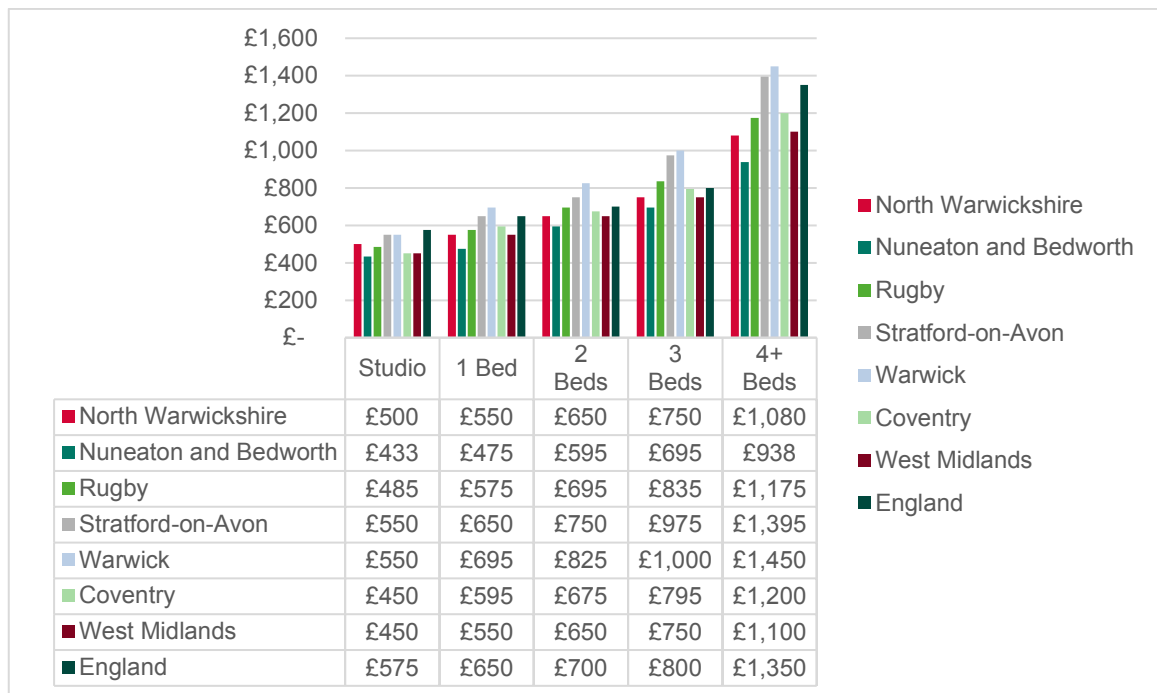
- 13.42 Across the study area outside of Nuneaton and Bedworth, median rents are higher than the regional average of £660 PCM. The median rent ranges from a low of £625 PCM in Nuneaton and Bedworth District to highs of £775 PCM in Stratford-on-Avon District and £800 PCM in Warwick District – both of which have median rental values above the national average.

Figure 13.5: Median Rents by Authority, 2021



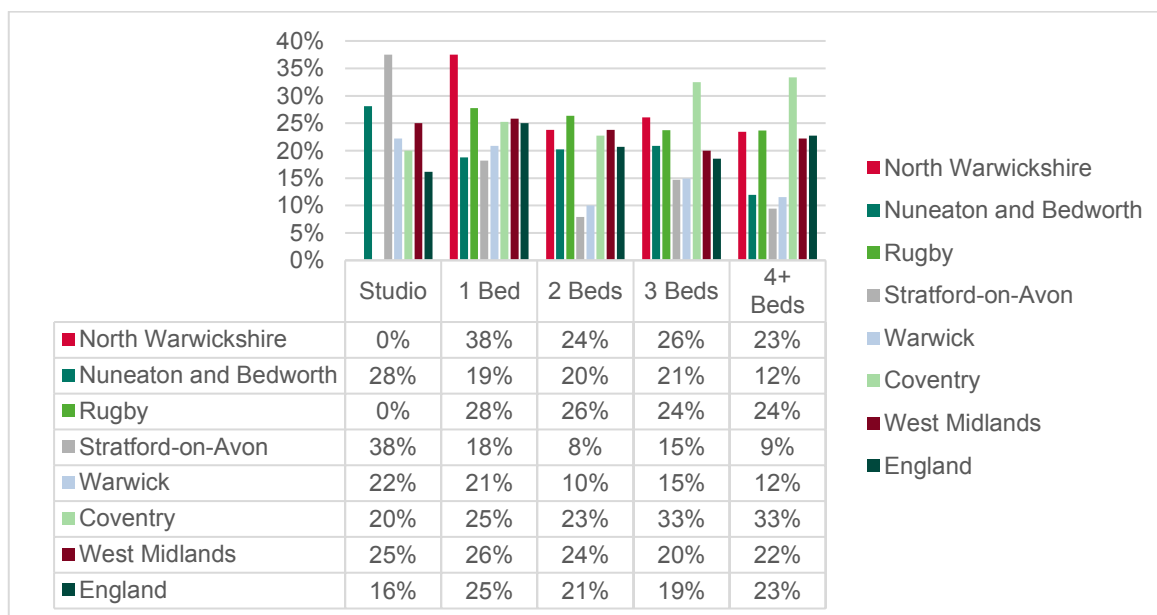
- 13.43 If we drill into median rents by property size, the Figure and Table below shows that the private rents in Warwick and Stratford-on-Avon for all property sizes except for studios are above the regional and national median. The median rents for 1 bedroom properties in Warwick are around £695 PCM with median rents for 2 bedroom properties at £825 PCM – significantly higher than the national equivalent of £700 PCM.
- 13.44 There are also strong rents in relative terms for family sized housing of 3 bedrooms in Warwick District at £1,000 PCM and in Rugby District at £975 PCM. In Coventry City, which has the largest private rented sector, median rents sit marginally above the regional median for all sizes but below the national median. In the context of a Build to Rent or co-living product, the rental values in Warwick and Stratford-on-Avon are more likely to attract an institutional investor; however, clearly the size of the market in Coventry City provides the critical mass necessary to make such a product work.

Figure 13.6: Monthly Median Rents by Size, Year to March 2021



13.45 Turning to rental trends, the evidence indicates that median rents have increased over the last seven years across the board but to the greatest extent in Coventry City at 33% when lettings are taken as a whole. This is followed by Nuneaton and Bedworth (25%) and North Warwickshire (23%). In comparison, growth in Warwick and Stratford-on-Avon has been notably weak.

Figure 13.7: Rental Growth in Coventry & Warwickshire, 2014 – 2021 (%)



Source: Icen analysis of ONS Private Rental Market Statistics. Note no data provided for rooms.

13.46 In the context of a Build to Rent or co-living product where properties tend to be developed with 1 and 2 bedrooms and to some extent 3 bedrooms, rental growth has been relatively strong in Coventry, Rugby and North Warwickshire; however, it is recognised that the latter has a small private rental market.

Affordability of the PRS and Local Housing Allowance

13.47 Affordable rents as well as securing the initial rental deposit constitute a key barrier to accessing housing for some households, particularly as private rents have grown faster than household incomes and above housing benefit allowances. The relative unaffordability of larger, family sized, homes for rent can often result in distortions and inefficiency in the market limiting the development of larger properties despite evident local needs.

13.48 The Local Housing Allowance (“LHA”) sets the amount of housing benefit or Universal Credit housing element that households in the private rented sector can claim. It is intended to reflect the lowest 30th percentile of local private rents to allow welfare claimants access to the market. On 1st April 2020, LHA rates were increased – following a five year freeze – to ensure that the rates covered the 30th percent of market rents in each area.

13.49 The latest allowances by bedroom size are set out in the Table below for the various BRMAs which cover the six authorities in the study area. The rates for 1 bedroom properties up to 4 bedroom properties are shown.

Table 13.5 Monthly LHA Rate³³ by Broad Rental Market Area by Size

BRMA	Authorities Covered	1 Bed	2 Beds	3 Beds	4 Beds
Birmingham	North Warwickshire	£525	£625	£675	£850
Coventry	North Warwickshire, Coventry, Nuneaton & Bedworth, Rugby and Warwick	£490	£575	£675	£875
Mid Staffs	North Warwickshire	£425	£550	£650	£850
Solihull	North Warwickshire, Stratford-on-Avon and Warwick	£575	£725	£875	£1,200
Rugby & East	Rugby and Stratford-on-Avon	£525	£640	£750	£995
Cheltenham	Stratford-on-Avon	£550	£695	£850	£1,195
Cherwell Valley	Stratford-on-Avon	£650	£775	£900	£1,297
Warwickshire South	Stratford-on-Avon and Warwick	£625	£750	£900	£1,200

Source: VOA, 2022

- 13.50 If we then set these LHA rates against private rental values and focus on the lower quartile rents (i.e. the lowest 25% or “entry-level rents”) for the study area authorities, it is clear that LHA has fallen below market rents for certain property sizes in a number of areas despite the LHA rate being increased on 1st April 2020. The Table below shows the difference between the LHA cap and entry-level rents.

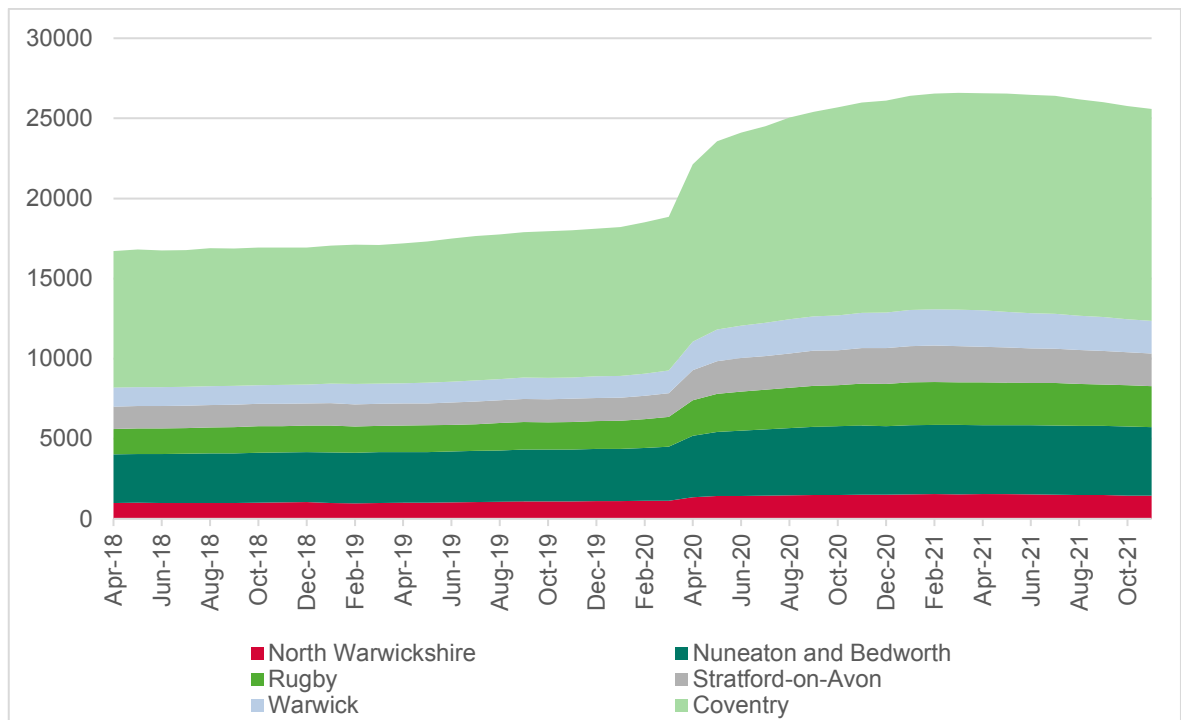
³³ LHA Rate correct in February 2022

Table 13.6 LQ Rents set against LHA Rates by Authority Area

		1 Bed	2 Beds	3 Beds	4 Beds
North Warks	LQ Rent	£485	£580	£650	£950
	Birmingham BRMA	£525	£625	£675	£850
	Difference	£40	£45	£25	-£100
	Coventry BRMA	£490	£575	£675	£875
	Difference	£5	-£5	£25	-£75
	Mid Staffs BRMA	£425	£550	£650	£850
	Difference	-£60	-£30	£0	-£100
	Solihull BRMA	£575	£725	£875	£1,200
Difference	£90	£145	£225	£250	
Nuneaton and Bedworth	LQ Rent	£425	£550	£625	£863
	Coventry BRMA	£490	£575	£675	£875
	Difference	£65	£25	£50	£12
Rugby	LQ Rent	£525	£650	£750	£1,000
	Coventry BRMA	£490	£575	£675	£875
	Difference	-£35	-£75	-£75	-£125
	Rugby & East BRMA	£525	£640	£750	£995
	Difference	£0	-£10	£0	-£5
Stratford-on-Avon	LQ Rent	£600	£700	£875	£1,200
	Cheltenham BRMA	£550	£695	£850	£1,195
	Difference	-£50	-£5	-£25	-£5
	Cherwell Valley BRMA	£650	£775	£900	£1,297
	Difference	£50	£75	£25	£97
	Rugby & East BRMA	£525	£640	£750	£995
	Difference	-£75	-£60	-£125	-£205
	Solihull BRMA	£575	£725	£875	£1,200
	Difference	-£25	£25	£0	£0
	Warwickshire South BRMA	£500	£625	£750	£950
Difference	-£100	-£75	-£125	-£250	
Warwick	LQ Rent	£650	£770	£900	£1,238
	Coventry BRMA	£490	£575	£675	£875
	Difference	-£160	-£195	-£225	-£363
	Solihull BRMA	£575	£725	£875	£1,200
	Difference	-£75	-£45	-£25	-£38
	Warwickshire South BRMA	£500	£625	£750	£950
	Difference	-£150	-£145	-£150	-£288
Coventry	LQ Rent	£525	£625	£725	£950
	Coventry BRMA	£490	£575	£675	£875
	Difference	-£35	-£50	-£50	-£75

-
- 13.51 As the analysis shows, there are differences between LHA rates in certain authority areas when set against entry-level rents - which points to particular challenges for both single households and family households who are trying to access the sector on lower incomes in these areas. It is particularly challenging for households in areas including Warwick and Coventry where LHA rates are below LQ rents for all sizes.
- 13.52 The changing nature of welfare benefits payments, particularly housing benefits and the introduction and shift to Universal Credit have direct implications for lower earning and economically inactive households.
- 13.53 The operation of the welfare benefit cap has been in place now for a number of years, restricting the total amount of benefit - including housing benefits - which in turn serves to restrict housing choice and opportunity for those family households affected as is evident from our analysis. The maximum amount of welfare and housing benefit is capped currently at £384.62 per week or £1,666.67 per month outside of London for families with children and couples.
- 13.54 It is possible to drill into the number of private rented sector households supported by Housing Benefit or Universal Credit. In November 2021, a total of 69,950 residents in the study area claimed housing benefit or Universal Credit with a housing element. Out of these claimants, around 25,590 lived in private rented accommodation (equal to 37% of all claimants) with Coventry City having the highest proportion of claimants living in private rented housing at 41% of all claimants and Warwick District having the lowest at 25%.
- 13.55 The Figure below shows how the number of claimants living in private rented accommodation has changed over time. Combined, the total number of claimants in the PRS increased from 16,710 in April 2018 to 25,590 in August 21 which is equal to an increase of 28%. As is clear, there was a notable increase following the introduction of lockdown measures in March 2020 in relation to the Covid-19 pandemic – with a significant increase seen in Coventry City.

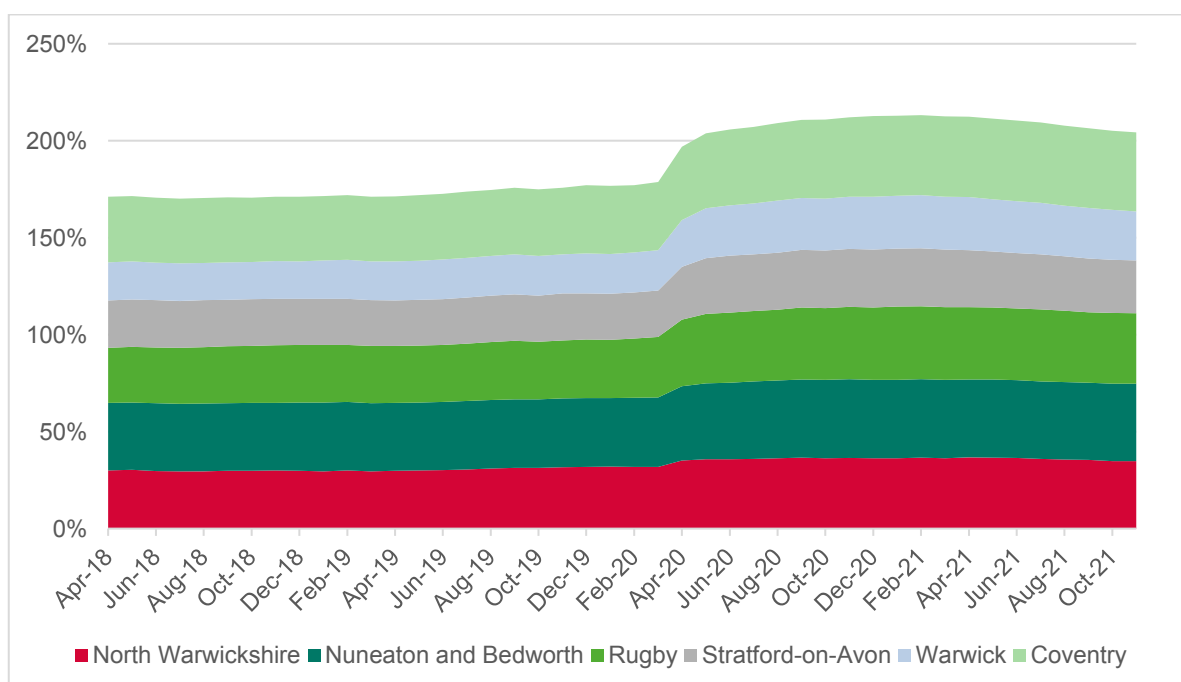
Figure 13.8: Households in Private Rented Sector Supported by Housing Benefits or UC



Source: DWP

13.56 Over the same period, the proportion of claimants living in the private rented sector increased from 31% to 37%. As is shown in the Figure below, at a local authority level, Coventry City and Rugby experienced the largest increases of claimants in the PRS. The sector has played a key role in supporting households claiming Universal Credit.

Figure 13.9: Proportion of Households Claiming Housing Benefit in PRS



Source: DWP

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- 13.57 It is the case that for many living in the PRS, barriers to households becoming homeowners are less likely to relate to income and/or the cost of housing and more about other factors such as saving for a deposit or difficulties obtaining a mortgage. However, it should also be noted that some households will choose to rent privately as this can be a more flexible option – particularly in Coventry City where entry-level rental values are notably lower than adjoining Warwick District.

Build to Rent Development

- 13.58 In the context of the private rented sector's growth over the last 20 years and a national housing shortage, successive Governments have looked to the private rented sector to play a greater role in providing more new build housing and have sought to encourage "Build to Rent" development.

The Policy Context

- 13.59 In respect of Build to Rent, the Housing White Paper (February 2017) was clear in 2017 that the Government wanted to build on earlier initiatives to attract new investment into large-scale scale housing which is purpose-built for market rent (i.e., Build to Rent).
- 13.60 At that time, the Government set out that this would drive up overall housing supply, increase choice and standards for people living in privately rented homes and provide more stable rented accommodation for families – particularly as access to ownership has become more challenging.
- 13.61 This was realised through the publication of the revised Framework (February 2019) which recognises the emergence of the strength of the private rented sector. The Framework (paragraph 61) says the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including those people who rent their homes (as separate from those in affordable housing need). The Framework's glossary also introduces a definition for Build to Rent development, thus recognising it as a sector:

"Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses but should be on the same site and/or contiguous with the main development".

- 13.62 It represents development which is constructed with the intention that it will be let rather than sold. The benefits of Build to Rent are strong and are best summarised in the Government's A Build to Rent Guide for Local Authorities which was published in March 2015. The Guide notes the benefits are which ranging but can include:

- Helping local authorities to meet demand for private rented housing whilst increasing tenants' choice "as generally speaking tenants only have the option to rent from a small-scale landlord".

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- Retaining tenants for longer and maximising occupancy levels as Build to Rent investment is an income focused business model;
 - Helping to increase housing supply, particularly on large, multiple phased sites as it can be built alongside build for sale and affordable housing; and
 - Utilising good design and high-quality construction methods which are often key components of the Build to Rent model.

13.63 This Build to Rent Guide provides a helpful overview of the role that Build to Rent is intended to play in the housing market, offering opportunities for those who wish to rent privately (i.e. young professionals) and for those on lower incomes who are unable to afford their own home.

13.64 Over recent years there has been a rapid growth in the Build to Rent sector backed by domestic and overseas institutional investment. Turning to the present and the latest market insight on Build to Rent as it begins to mature and strengthen as a development sector, the Savills UK Build to Rent Market Update³⁴ for Q3 2021 states that the market now had 50,800 completed units, 37,700 under construction and 84,000 in the development pipeline, a total of 172,500 units.

13.65 The report notes that around 88% of the operational stock was located in City Centre flats but there had been a slight shift towards “housing led, family targeted” Build to Rent schemes in suburban locations. This was on the belief that there is a wider PRS market for houses (63%) than for flats.

13.66 The Savills work also noted that the sector had bounced back from a Pandemic related slowdown. They also noted new entrants into the sector seeking longer term investment.

The Profile of Tenants

13.67 The British Property Federation (“BPF”), London First and UK Apartment Association (“UKAA”) recently published (February 2021) a report³⁵ profiling those who live in Build to Rent accommodation in London - which makes up the bulk of the market. The proportion of Build to Rent in London accounts for 47% of current provision falling to 44% once the pipeline supply is included. This demonstrates a slight movement out of London which goes against the historic trend. There is now more Build to Rent activity outside of London than in the Capital.

³⁴ https://www.savills.co.uk/research_articles/229130/306754-0

³⁵ https://buildtorent.files.wordpress.com/2021/01/who-lives-in-build-to-rent-1.pdf?mc_cid=624df5d223&mc_eid=e05cc2220b

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- 13.68 Around 62% of residents were aged between 25 and 34 compared with 47% in the wider private rented sector market. The remaining residents included 17% aged between 16 and 24 and 13% aged 35-44 both of which were below the corresponding values for the wider private rented sector market.
- 13.69 The survey based data identified that incomes are similar to those in private rented sector accommodation with 43% earning less than £32,000 and 29% earning between £32,000 and £47,000. Typically, Build to Rent residents spend between 29% and 35% of their income on accommodation. This compares to 29% to 32% in the wider private rented sector demonstrating a willingness to pay slightly more. The lower value would put this group in the lowest 40% of earners in London.
- 13.70 The report noted that Build to Rent has comparable levels of affordability but is notably more affordable for couples and sharers. This is perhaps reflected in the higher incidence of these household types within the Build to Rent sector.
- 13.71 The report also identified a broadly similar balance of people working in the public and private sectors with 90.5% of residents employed in the private sector living in Build to Rent accommodation compared with 80% in the private rented sector. The most common industries included Finance and Insurance (25%), Other Services (20%) and IT and Communications (including marketing) (15%); however, it should be highlighted that this was London focussed as the key area for the product.

The Existing Build to Rent Provision

- 13.72 The authority areas in the study area currently have no planning policy in place to deal with planning applications which are submitted for Build to Rent development; although this in part reflects the recent emergence of the sector and changes to national planning policies concerning the status and importance of Build to Rent as part of the private rental market.
- 13.73 However, in some areas, this has not hindered Build to Rent coming forward. As is clear from the Table below, there have already been a handful of schemes which have come through the planning system. A total of 531 Build to Rent units are either coming forward and are under construction or have already been delivered in Rugby, Coventry and Stratford-on-Avon. To date, there has been no activity in Warwick District.

Table 13.7 Build to Rent Provision, 2022

	Consented	UC	Completed	Total
North Warwickshire	0	0	0	0
Nuneaton & Bedworth	0	0	0	0
Rugby	0	360	0	360
Stratford-on-Avon	0	0	82	82
Warwick	0	0	0	0
Coventry	0	0	89	89
Total	0	360	171	531

Source: LPA Monitoring

- 13.74 In Rugby District, 360 Build to Rent units are coming forward as part of the regeneration of the town's Market Quarter. The scheme is being delivered across four separate blocks providing for 1 and 2 bedroom apartments. At this stage, no other schemes for Build to Rent have reached pre-application stage.
- 13.75 In Coventry City, 49 Build to Rent units have been constructed as part of the Spirits Quarter regeneration development with a mix of 2, 3 and 4 bedroom homes coming forward as part of Phase 1 of the wider development site. A separate scheme at Herbert House located in Tile Hill has also delivered 40 units – providing a mix of 1 and 2 bedroom apartments. A 1 bedroom apartment is currently on the market for £625 PCM, and a 2 bedroom apartment is currently on the market for £730 PCM. These rents are notably above median rents in the City for the respective sizes.
- 13.76 In Stratford-on-Avon, 82 Build to Rent units have been delivered at Fordham House in Stratford-upon-Avon providing for a mix of 1 and 2 bedroom apartments. At the time of writing, the development is fully let. A 1 bedroom apartment was let at £750 PCM in June 2021 which is £100 PCM more than the median rent for this size; however, this fee includes extras such as wi-fi.

The Recommended Policy Response

- 13.77 It is evident that the private rented sector is growing and there is a particular age profile and household group that it caters for which are factors all in line with the target tenant of the Build to Rent product. The PPG on Build to Rent recognises that where a need is identified that local planning authorities should include a specific plan policy relating to the promotion and accommodation of Build to Rent.
- 13.78 Icenl consider there will be an ongoing need and a role for Build to Rent provision to continue to support these particular household groups for years to come moving forward. Having looked in detail at the sector across the study area, there is evidence of the necessary characteristics of target tenants as well as the overall market in Warwick, Coventry and Rugby. As a result, it is recommended that a specific policy is developed by these three authorities. As the market for suburban build-to-

rent development matures, there is potential for a greater role for the sector in these and other locations.

- 13.79 A Local Plan policy would effectively set out parameters regarding how schemes would be considered, and how affordable housing policies would be applied. In considering the dwelling mix proposed in relation to a Build-to-Rent scheme; we would expect the focus to be on 1, 2 and some 3-bed properties given the occupancy profile associated with Build to Rent accommodation. However, given that this is still a relatively embryonic sector, the Councils need not be overly prescriptive.
- 13.80 The Framework's definition of Build-to-Rent development sets out that schemes will usually offer tenancy agreements of three or more years and will typically be professionally managed stock in single ownership and management control. It would be appropriate for the Council to adopt a consistent definition.
- 13.81 The Councils will need to consider affordable housing policies specifically for the Build-to-Rent sector. The viability of Build to Rent development will however differ from that of a typical mixed tenure development: returns from the Build to Rent development are phased over time whereas for a typical mixed tenure scheme, capital receipts are generated as the units are completed.
- 13.82 In general terms, it is expected that a proportion of Build to Rent units will be delivered as 'Affordable Private Rent' housing. The PPG³⁶ states that:

"The National Planning Policy Framework states that affordable housing on build to rent schemes should be provided by default in the form of affordable private rent, a class of affordable housing specifically designed for build to rent. Affordable private rent and private market rent units within a development should be managed collectively by a single build to rent landlord.

20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme. If local authorities wish to set a different proportion, they should justify this using the evidence emerging from their local housing need assessment, and set the policy out in their local plan. Similarly, the guidance on viability permits developers, in exception, the opportunity to make a case seeking to differ from this benchmark.

National affordable housing policy also requires a minimum rent discount of 20% for affordable private rent homes relative to local market rents. The discount should be calculated when a

³⁶ ID: 60-002-20180913

discounted home is rented out, or when the tenancy is renewed. The rent on the discounted homes should increase on the same basis as rent increases for longer-term (market) tenancies within the development”

- 13.83 The Councils should have regard to the PPG on Build-to-Rent development with the starting point for affordable housing therefore being that 20% of units would be Affordable Private Rented units at a discount of 20% to local market rents.

Co-Living

- 13.84 The concept of co-living in its modern form of housing is relatively new, and whilst it is not specifically defined in the Framework, it is often used as part of a wider definition relating to a type of intentional community where residents share living space and a set of interests, values and/or intentions.
- 13.85 Traditionally co-living has ranged from the coming together of space, time and resources for activities - for example, meals and discussion in the common living areas - through to shared workspace and collective endeavours such as living more sustainably.
- 13.86 Over recent years, media interest in co-living has in part been driven by the pressures faced by the millennial generation and the potential to provide communal living driven by affordability and a transient, social oriented young professional resident in high cost locations. Traditionally the idea of co-living through sharing of rented housing is not a new idea and has long operated across the country. In this context, co-living can encompass many structural forms.
- 13.87 In its current form, modern co-living in the UK tends to be urban focused and integrated into a single building, house, or apartment, a sharing of amenities, and a demographic trend towards 20 to 30 something professionals. As a market segment, this is most well developed currently in London where companies such as The Collective, Roam, Fizzy Living and Lyvly are actively adopting a 'WeWork' style model to housing based on a new renting approach for the Capital that offers private bedrooms, shared common spaces and community events, and an all-inclusive rent.
- 13.88 The focus of existing co-living examples tend to be large city schemes with studies indicating that whilst the sharing of space is deemed more acceptable - especially by city dwellers - the model of co-living needs to carefully consider the scale of provision balanced alongside personal space needs and privacy.

13.89 There are a number of benefits of Co-Living with the main benefit being that it is a safe and reliable form of housing in a time of huge housing shortage. More widely, Cleaver and Frearson³⁷ have recently highlighted six specific categories of the advantages of Co-Living as follows:

1. Affordability;
2. Health and happiness;
3. Choice and flexibility;
4. Safety and security;
5. Diversity; and
6. Sustainability

13.90 In terms of affordability, the provision of shared space offers cost savings. This is mirrored by research conducted by CBRE³⁸ which found that “co-living is a cost-effective city centre housing solution, that achieves impressive densities”.

13.91 As previously mentioned, one of the demand drivers of an increase in co-living is due to the affordability, because of the decline in affordability of homeownership, this has shifted demand for private rental housing. Co-living also provides more choice and flexibility as well as shared live/workspace which in turn creates diversity.

13.92 With the pandemic-driven shift towards professionals working from home, the availability of dedicated space to work is an important attractor. However it has been reported³⁹ that some operators have felt the impact on their business model as “Government restrictions have forced operators to suspend some perks, limit mixing and stop all but essential travel” and in some cases outside visitors where banned during lockdowns. As a result the demand for such homes has slowed.

Cost of Co-living

13.93 Due to the limited number of enquiries around co-living development in the study area, it is difficult to grasp the potential cost of this accommodation. It also needs to be considered that the cost of co-living is not directly comparable to rental accommodation as it includes the cost of utilises as well as access to shared facilities (e.g. gyms, cinema rooms etc.) the extent and quality of which will differ from development to development. Some developers even reduce costs for those that sign up to longer tenancies.

³⁷ All Together Now: The Co-living and Co-working Revolution (Cleaver, Naomi and Frearson, Amy), 2021

³⁸ <https://www.cbre.co.uk/services/business-lines/valuation-and-advisory/valued-insights/articles/introduction-to-Co-Living>

³⁹ <https://www.bloomberg.com/news/articles/2021-06-16/the-collective-said-to-explore-sale-as-pandemic-curbs-co-living>

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- 13.94 Where there is an established co-living market in the UK (i.e. London and Manchester), we have looked to draw out comparables. In London, co-living studio flats can range from £1,050 per month in Hounslow to two-bedrooms at £1,650 per month in Camden⁴⁰.
- 13.95 In Manchester, some co-living studio apartments are being marketed⁴¹ from £215 per week which equates to £930 per month. However, this particular example includes access to co-working space as well as co-living as part of the overall rental cost.
- 13.96 These costs compare to the equivalent median rent e in the wider private rented market in Hounslow of £800 for a studio and £1,950 per month for a two bedroom home in Camden. In Manchester, the average Studio flat is £575 per month. Once bills are added to rental costs it reasonable to say that cost of co-living is comparable to renting although less so in Manchester and most likely in the study area. This would make broad sense as a burgeoning sector would struggle to get a foothold in the market if it was considerably more expensive than traditional stock.
- 13.97 It is also the case that as more of the space the developer/owners are able to make more money per square foot than they do from traditional rental accommodation as each tenant is charged for it. The developer can also benefit from added sales in the facilities they provide (e.g. if they have a coffee shop).

The Typical Profile of Tenants

- 13.98 The growth in the market for co-living developments is linked to the wider growth in the private rented sector as considered upfront in this section - and the rise of house sharing within this - and has seen particular interest from the younger population. One key macroeconomic factor is due to the affordability constraints of home ownership, which has resulted in a growing number of people renting homes and for a longer level of time (e.g. whilst households save for a deposit).
- 13.99 Co-living has evolved because of the way of people live. There's a change in "patterns of work, rising loneliness, ageing...making us think differently about the sorts of homes we want, and co-living is one potential solution", according to CBRE⁴². It is the case that young professionals in particular are being pushed towards private rented accommodation due to rising house prices and newer generations prefer a more flexible approach to living⁴³. For this group, the offer of a flexible, short-

⁴⁰ <https://www.gravitycoliving.com/blog/cost-living-london/>

⁴¹ <https://www.oppidan-life.com/location>

⁴² <https://www.cbre.co.uk/services/business-lines/valuation-and-advisory/valued-insights/articles/introduction-to-Co-Living>

⁴³ <https://www.fmindustry.com/en/2019/perspectives/47798/Why-Co-Living-is-Driving-the-UK%27s-Private-Rental-Sector-private-rental-homes-UK-Co-Living-Millennials-property-asset-classes-Residential-Property-United-Kingdom.htm>

term leases and an opportunity to live in a part of community (with all bills covered), is particularly appealing.

- 13.100 Overall, therefore, the current co-living business model and characteristics principally draw on a large base of transient younger, high skilled professional households and individuals - particularly those without dependents. If we consider the profile of private renters across the study area, as set out upfront in this section, these are characteristics which are akin to Warwick District and Rugby District. Owing to the size of the market and potential in Coventry City, this must also be an area to test.
- 13.101 There is a high proportion of single individuals aged between 20-39 in these areas with a relatively high proportion in higher skilled roles living in the sector in Rugby and Warwick. There is also a high proportion of 'other' households in the sector – particularly in Coventry City - which includes unrelated adults sharing which all points towards an underlying market for a co-living product. Clearly, not all individuals which have these characteristics will choose a co-living product; however, there is unarguably a large base relative to the target demographic.

The Current Co-Living Position in Coventry and Warwickshire

- 13.102 The Councils have no specific policy on co-living development owing to the fact that co-living is a relatively new housing model with few schemes outside of London. It is also the case that none of the authority areas have any pipeline supply for such housing developments. However, the product is embryonic, and we would expect a number of schemes to come forward via pre-application discussions in the coming months.

The Policy Response

- 13.103 On the same basis that there is a strong foundation to develop policy around Build to Rent, it is considered that a specific policy should be developed for co-living housing in Coventry City, Warwick District and Rugby District in the main urban areas. The nature of the market in these areas demonstrates that there is potential for a market to grow and support the housing needs of a number of household groups.
- 13.104 Outside of London, we are not aware of any planning authorities that have a specific adopted co-living policy. Manchester City Council has developed an interim co-living policy and has made clear that an initial ceiling of up to 5,000 units to evaluate and test the market for co-living housing. As noted, there is now adopted policy at the pan-London level as well as in a number of London Boroughs in the context where a number of schemes are already fully operational in London.
- 13.105 The London Plan under Policy H16 relating to large-scale purpose-built shared living provides guidance on co-living developments. The London Plan recognises that these developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. It refers principally to schemes which are generally of at least 50 units

and provide an alternative to traditional flat shares and includes additional services and facilities, such as room cleaning, bed linen, on-site gym and concierge service.

13.106 In addition to the London Plan, a number of London Boroughs have or are developing specific local planning policies to respond to co-living schemes as they become more of a focal point for developers in the private rented sector. This includes Hackney and Lambeth which were the first two to progress with local policy on the sector. In both instances, as examples, the Councils acknowledged the principle of purpose-built, large-scale shared living, in line with the London Plan policy – noting a scale of 50 units in Hackney and 30 units in Lambeth. A range of criteria is set out including the requirement that it meets an identified need.

13.107 In Manchester, the City Council has recognised a need to be open to innovative housing models in an interim policy statement whilst setting an ‘initial ceiling’ of 5,000 units to be tested against a number of criteria, policies and specific standards in line with existing planning policy. The initial ceiling is intended to enable the Council to evaluate the suitability of co-living development at a manageable scale, and the contribution co-living can make to its core objectives.

13.108 Drawing on the policy frameworks established in the London Plan, the Council should construct a policy which supports high-quality co-living schemes where:

1. it is of good quality and design and adhere to minimum space standards⁴⁴;
2. it is located centrally and is well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency;
3. it is under single management;
4. The facility has a concierge or other adequate safety and security personnel;
5. its units are all for rent with minimum tenancy length of no less than three months;
6. communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:
 - a) convenient access to a communal kitchen with adequate facilities to meet the needs of all residents;
 - b) outside communal amenity space (roof terrace and/or garden);
 - c) internal communal amenity space (dining rooms, lounges) ;
 - d) laundry and drying facilities;
7. the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes

⁴⁴ Nationally Described Space Standards

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8. a management plan is provided with the application
 9. it delivers a level of affordable housing (discounted private rent) (set at viable levels) or up-front cash in lieu of a contribution towards affordable housing or an annual contribution in perpetuity.

13.109 As set out it is expected that co-living schemes could be delivered in the main urban areas of Coventry, Warwick and Rugby where there is a core demographic and tenant profile which would align with the target market of co-living housing. These areas are also well connected to local services and transport and would help support the night-time economy in conjunction with the existing student population.

13.110 The policy could expect that schemes would be under single management and offer rent with a minimum tenancy of no less than 3 months as well as align with local planning policies and space standards.

13.111 Other local authorities have encouraged co-living development where it is located next to growth areas or major centres of employment, it meets zero-carbon objectives, where students are precluded from the development and where it applies maximum tenancy lengths. These can be further considerations for the Councils to draw on when developing policies.

13.112 As noted previously, Manchester City Council has also limited the number of co-living developments in the City to 5,000 units⁴⁵ to “allow the Council to evaluate the suitability of this type of development at a manageable scale, and the contribution these facilities can make to our core objectives.” The three selected authorities could consider a similar approach.

Student Housing Needs

13.113 This section considers the housing needs of students across the Coventry and Warwickshire area drawing on the existing profile of students and the expected growth in student numbers and purpose built student accommodation gleaned from our core analysis and discussions with key stakeholders.

13.114 The Framework is clear that the needs of students, as a key household group, should be assessed and reflected in planning policies.

The Existing Profile of Student Housing Need

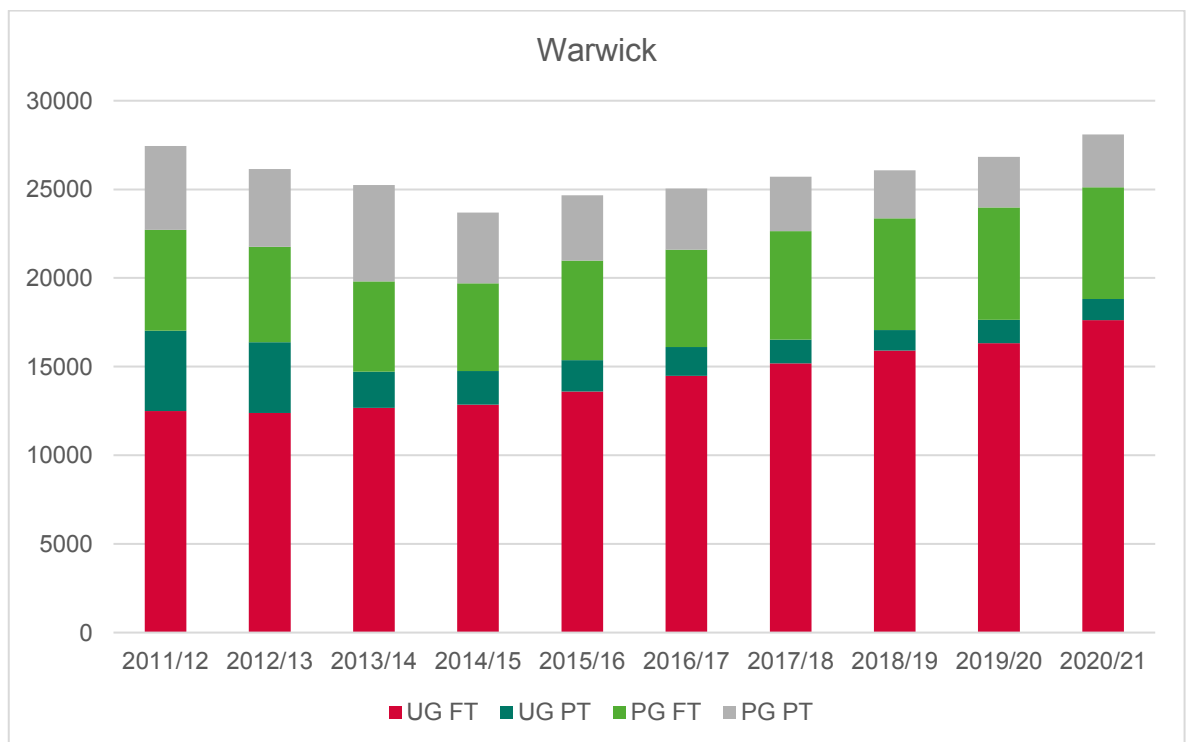
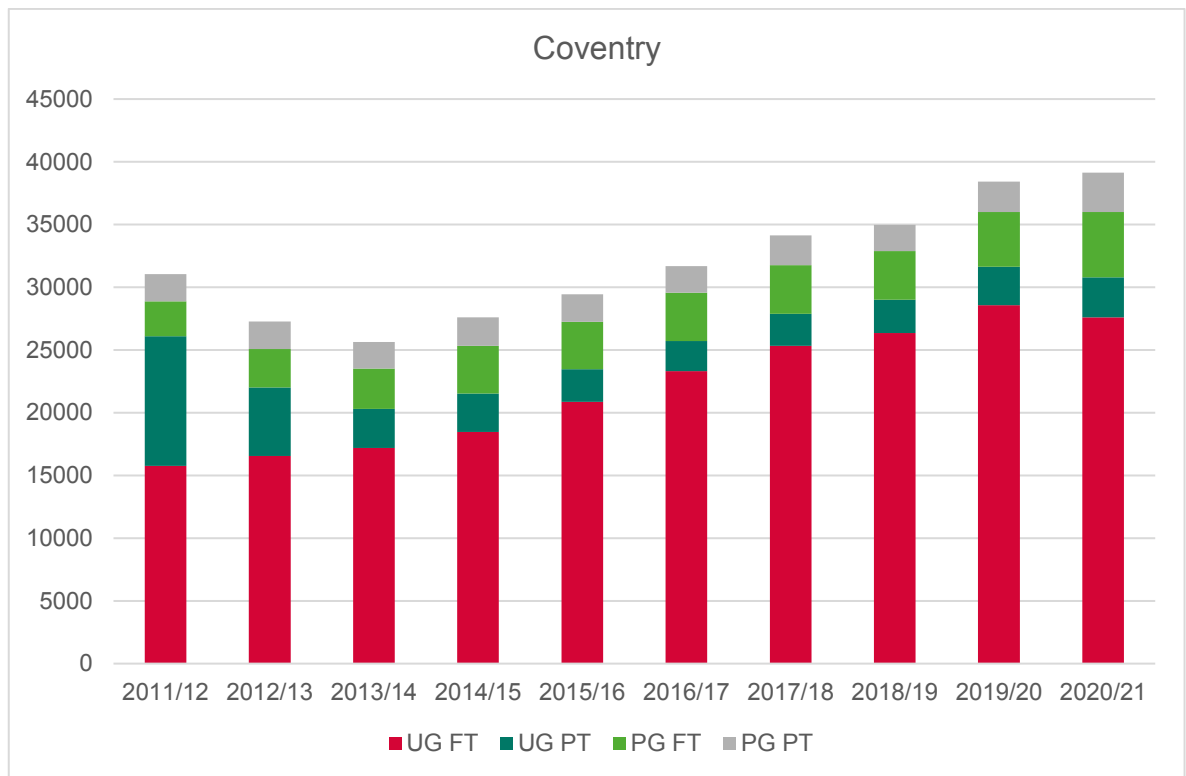
13.115 Across the study area, at the point of the 2011 Census, there were around 47,950 full time students aged 18 and over. The area has two higher education (“HE”) establishments which are relevant to this assessment: Coventry University and Warwick University. The study area also has a number of

⁴⁵ <https://democracy.manchester.gov.uk/documents/s17815/Co-living%20in%20Manchester.pdf>

colleges; however, the data allowing us to track trends in student numbers year-on-year for further education establishments is not consistently available. In any event, it is HE students which principally impact on the housing market, and therefore the assessment focuses on the two Universities.

- 13.116 IcenI has access to data allowing us to track trends in student numbers for Coventry University and Warwick University from the Higher Education Statistics Agency (“HESA”). Drawing on data from the HESA, the Figures below set out the pattern of growth over the last 10 years from 2011/12 to 2020/21. In the academic year 2020/21, the two Universities had a combined total of 67,245 full-time (“FT”) and part-time (“PT”) Undergraduate (“UG”) and Postgraduate (“PG”) students.
- 13.117 As is clear from the first graph, the student population decreased notably at Coventry University in the years following the introduction of the tuition fee rise in 2012; however, since a low of 25,630 students in 2013/14, student growth has increased significantly over the period to 2020/21 with an additional 13,510 students or 53% growth. The majority of this growth has been in FT UG students (i.e. over 10,000 additional students equal to 61% growth). In 2020/21, the University had a total of 39,140 students; however, it should be noted that Coventry University has a number of campuses outside of Coventry City including in London and Scarborough which are captured in this figure.
- 13.118 Turning to Warwick University, the second graph shows that post tuition fee increases, student growth decreased year-on-year to 2014/15 to reach a low of 23,685 students before increasing steadily over the period to 2020/21 with 19% growth across all student groups. However, all growth has been focussed on FT students with an increase of 37% and 28% in UG and PG students respectively.

Figure 13.10: Profile of Student Population, 2011-21

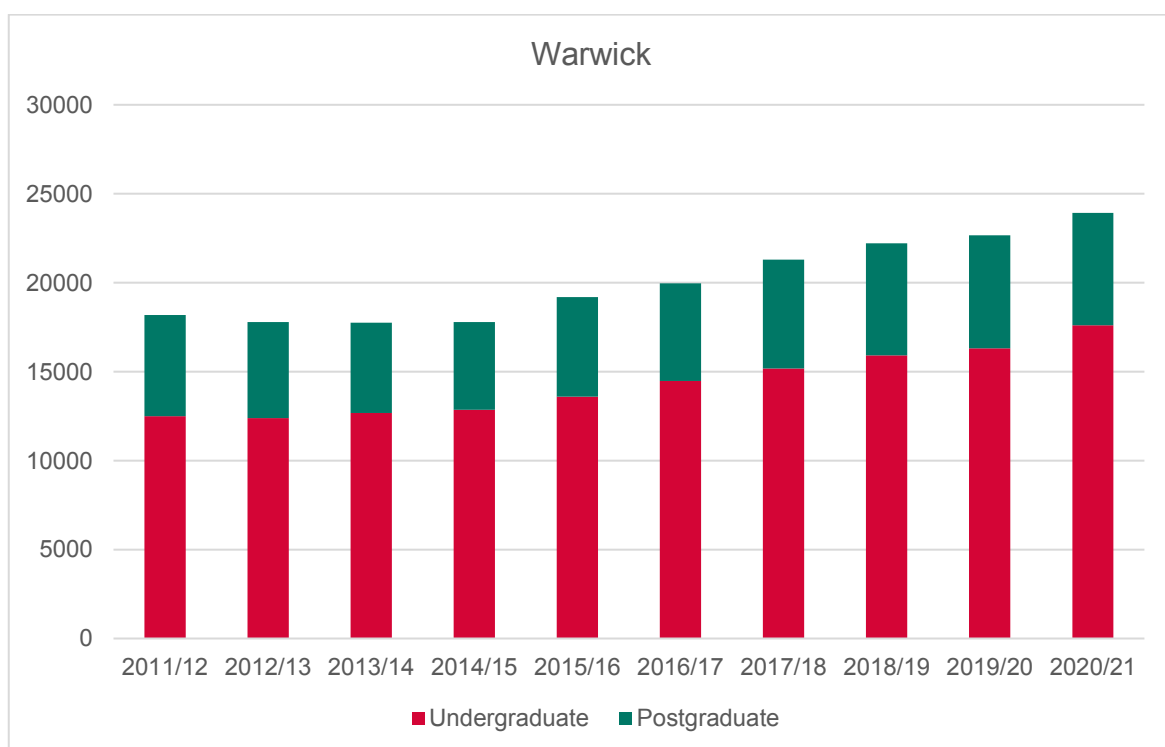
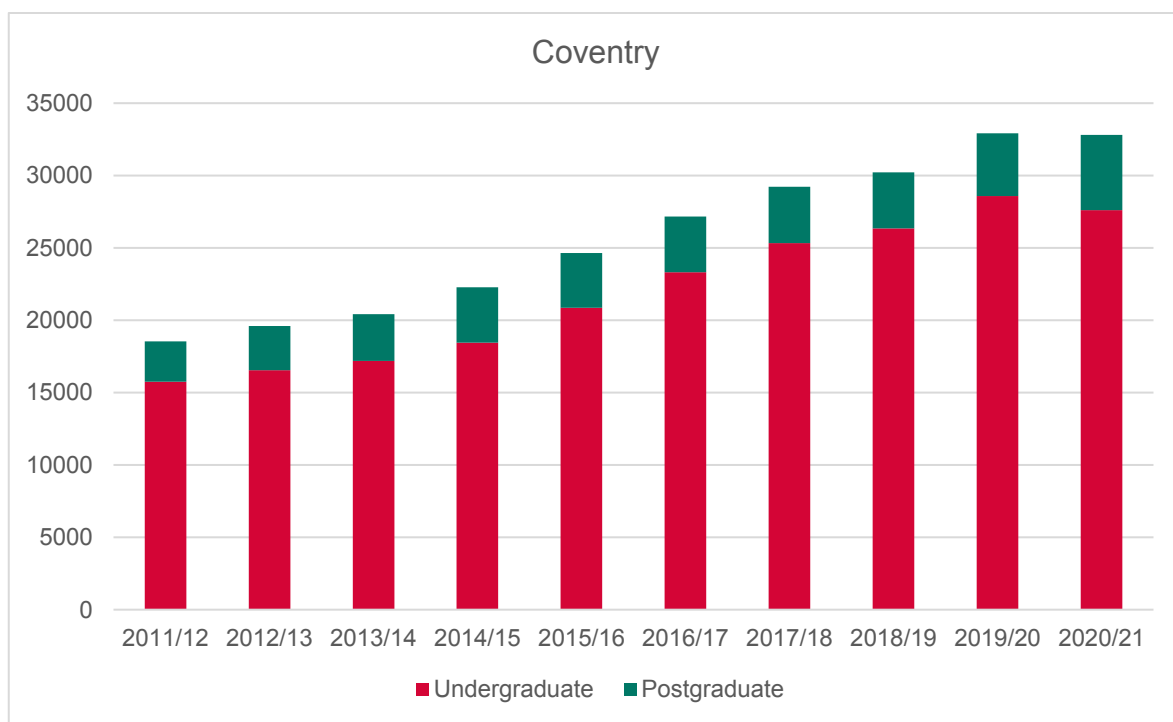


Source: HESA 2021

13.119 Recognising that housing needs arise principally as a result of FT students with those studying PT typically also living and working locally already or living with parents; we have drilled into this group specifically.

13.120 At Coventry University, the number of FT UG students grew over the 2011-21 period by 10,420 whilst the number of FT PG students grew by 1,980 totalling an additional 14,270 FT students. At Warwick University, the number of FT UG grew over the 2011-21 period by 4,765 students whilst the number of FT PG increased by 1,365 totalling 5,735 students. In 2020/21, Coventry University had 32,810 FT students and Warwick University had 23,920 FT students.

Figure 13.11: Trends in Full Time Higher Education Students



13.121 Finally, in respect of the profile of students, we note that there has also been a significant change in the origin of Coventry University’s students with a notable increase in the number of international students with growth of 98% for EU students and 121% for non-EU students. Warwick University has also seen an increase in EU and non-EU students; however, the growth in relative terms has been to a much lesser extent.

Table 13.8 Change in Domicile of Students, 2011-2021

	Domicile	2011/12	2020/21	Change	%
Coventry University	UK	24,630	25,380	750	3%
	EU	1,915	3,800	1,885	98%
	Non-EU	4,505	9,960	5,455	121%
Warwick University	UK	18,650	17,805	-845	-5%
	EU	2,195	2,730	535	24%
	Non-EU	6,590	7,575	985	15%

Source: HESA 2021

13.122 Financially it is more lucrative for the universities to attract non-EU students and historically this has been in the main Chinese and Indian students. At a national level the number of Chinese students has fallen as a result of the pandemic while the Indian market has strengthened on the basis of increased numbers of post-study work visas.

The Profile of Accommodation

13.123 At the point of the 2011 Census, there were around 47,950 full time students aged 18 and over in the study area. In comparison, both Universities had 36,725 students in total in 2011/12. The Table below sets out a breakdown of students resident in each authority by age. Reflecting the location of both Universities, Coventry and Warwick had a significantly higher number of FT students.

Table 13.9 Profile of Full Time Students Aged 18 and Over

	North Warks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	Coventry
Aged 18-19	582	1,277	1,048	1,212	2,432	9,139
Aged 20-24	357	781	488	704	5,912	13,977
Aged 25 and Over	285	741	595	550	1,654	6,214
Total (No.)	1,224	2,799	2,131	2,466	9,998	29,330

Source: 2011 Census

13.124 The Table below sets out the accommodation profile of FT students at the point of the 2011 Census across Coventry and Warwickshire. This shows that the largest proportion of students aged 18 and over lived with parents in the non-University authority areas of North Warwickshire, Nuneaton and Bedworth, Rugby and Stratford-on-Avon. In these areas, the second most popular option was “other households” which includes living in a family household (i.e. living with a spouse, partner or child).

13.125 In Warwick District and Coventry City, the majority of students lived in all-student households, which principally comprise Houses in Multiple Occupation (“HMOs”). There was also a high proportion in each area living in University Halls as well as living either with parents or with a spouse or partner; however, in Warwick District almost half (48%) lived in HMOs and over a third (38%) in Coventry City lived in HMOs.

Table 13.10 Profile of Full Time Students Aged 18 and Over by Accommodation Type (%)

	North Warks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	Coventry
Living with Parents	75%	67%	60%	57%	16%	19%
University Communal	0%	0%	0%	0%	17%	23%
Other Communal	0%	0%	5%	10%	1%	1%
All Student Household	4%	6%	8%	10%	48%	35%
Living Alone	2%	4%	3%	4%	4%	7%
Other	19%	23%	24%	19%	14%	15%

Source: 2011 Census

13.126 It is notable that significant numbers of students residing in HMOs can lead to the dominance and concentration of HMOs in particular areas. Although it is not uncommon for areas with a high population of students to have a number of all student HMOs, it is important that a mix of residential accommodation be maintained within the neighbourhood. In particular:

- Student populations are transient and thus concentrations of HMOs can create relatively transient communities of people with a high population turnover. This can, in some circumstances, lead to issues of environmental upkeep and fly-tipping, as well as 'ghost' neighbourhoods in summer months.
- Areas with concentrations of HMOs are those in which there is an above average proportion of properties owned by landlords rather than owner occupiers. This can result in reduced investment in the upkeep of properties, which can lead to a general downward trend in neighbourhood quality.
- Growth in student HMOs within an area can inhibit the availability and supply of homes for other groups within the population, such as for families.

13.127 Coventry City Council have commissioned a separate report to drill into issues around student housing dynamics and HMO properties which will be published alongside the main HEDNA in due course.

Expected Student Growth and Provision of PBSA

- 13.128 This sub-section reflects discussions between IcenI and the respective Universities which were focussed on understanding the latest profile of current students and expected student growth as well as our review of planned provision of PBSA. The dynamic between the Universities' expansion plans, growth in student numbers and the provision of PBSA is critical to determining whether additional provision is necessary moving forward.
- 13.129 It should however be noted upfront that due to funding cycles, the Universities typically only plan ahead five years. There has also been a need to revisit strategies and masterplanning in a post-Covid world which has caused delays with bringing firm plans forward. It is therefore difficult at the time of writing to draw any firm conclusions from these discussions.

Coventry University

- 13.130 As set out, in the academic year 2020/21, Coventry University had a total of 39,140 students as part of its wider "group" which includes campuses in London and Scarborough as well as Coventry. Through discussions with the University, we understand that around 28,000 students of the global total study on courses at the Coventry campus.
- 13.131 The University owns accommodation on-campus equal to around 2,500 bedspaces which are principally aimed at first year students alongside a number of other specific groups. The latest position with regards to capacity is that around 2,200 bedspaces are occupied at the time of writing. In addition to the on-campus bedspaces, the University is also supporting 80 tenancies of students living in HMO accommodation with the University's accommodation team noting that a high number of students are choosing to live in PBSA with this trend increasing year-on-year as more of this accommodation comes forward.
- 13.132 IcenI has drilled into data gathered by HESA to better understand students' term-time accommodation preferences. This has been split out between first year UG, returning UG and all PG students; recognising that there is a distinct difference in preference between these main groups. However, it should again be noted that the data is skewed by the "group" total and the other University campuses and the data should be treated with caution – particularly around University owned halls.

Table 13.11 Coventry University Full-Time Student Term-Time Accommodation (%)

Accommodation	First Year UG	Returning UG	All PG
University Owned Halls	23%	33%	15%
Private Sector Halls	6%	8%	4%
Parents Home	27%	24%	11%
HMOs	15%	17%	32%
Own Residence	14%	13%	13%
Other	7%	5%	11%
Not Known	8%	1%	14%

Source: HESA, 2020/21

- 13.133 As is clear, there is a high proportion of UG students living in University Halls with around a quarter (23%) of first year UG students living in Halls owned by Coventry University. The majority (27%) of first year UGs live with parents with a high proportion also living in all students households or HMOs; as well as PBSA – which is taken to include both private sector halls and partly those with their “own residence” as this includes renting. The majority of PG students live in HMOs with a high proportion also expected to be living in PBSA.
- 13.134 The University has experienced notable growth over the last decade becoming the fastest growing University in the UK which is detailed upfront in this section. This has been driven by a significant investment programme over the last ten years including the development of the Alison Gingell Building which provides state of the art health simulation to support health and life science courses. This has been coupled with the development of new accommodation including Bishop Gate and Godiva Place which both opened in 2018 providing 725 and 772 en-suite bedrooms and studios for students respectively.
- 13.135 Icenis has reviewed the University’s Corporate Strategy 2030 and has discussed growth plans with the University’s accommodation team; however, we have been unable to confirm specific numbers with regards to the expected student population over the coming years. Nevertheless, it has been confirmed through our discussions that the University will continue to focus on both UG and PG students and the opportunity for progression from UG to PG courses. The University also expects the shift to a rising number of international students to continue moving forward with the international market being another focus. Nevertheless, at this stage, it is expected that student numbers will remain static for the next 2-3 years.
- 13.136 The Table below shows the number of bedspaces approved and due to be delivered in Coventry City over the next three years. In total, around 9,275 bedspaces are due to be completed which is a significant volume of development for the student housing sector. 4,819 bedspaces have been delivered in the last three years. There are currently no further PBSA schemes anticipated after 2023/24.

Table 13.12 Purpose-Built Student Accommodation, Bedspaces

	Completed	Committed
2017/18	0	
2018/19	2,602	
2019/20	2,217	
2020/21	0	
2021/22		5,449
2022/23		2,825
2023/24		1,000

- 13.137 Taken together, alongside the total amount of PBSA already in the City including University owned Halls – estimated to be around 16,000 bedspaces in total based on research undertaken by Coventry University – there is a significant volume of PBSA for students on the ground and in the pipeline.
- 13.138 In the short-term, with the volume of PBSA in the pipeline due to be delivered in the next 3 years and the expectation that student numbers will remain static, it does not appear that there is a need for intervention. However, the University’s plans to continue to grow the international student population could have an impact on housing needs in the medium to long-term. Through our discussions, it is also our understanding that there is an increasing number of students opting for PBSA as opposed to sharing with other students in HMOs due to the higher and improving quality of this form of stock – this will have to be closely monitored.
- 13.139 The Council should continue to liaise with the University as appropriate to ensure that the supply of PBSA over the long-term does not flood the market and a balance is struck. A separate study being commissioned by Coventry City Council will drill into these issues and consider the potential for reusing surplus PBSA for to house other household groups.

Warwick University

- 13.140 In the academic year 2020/21, Warwick University had a total of 28,105 students. Through our discussions with the University’s accommodation team, we understand that the student population increased to around 29,550; however, this data is not yet available via HESA. The University guarantees accommodation for first year UG students as well as a small proportion of other student groups.
- 13.141 In total, the University houses 7,500 students on-campus which the accommodation states is sufficient supply to home all students that require it in line with the student allocation policy. Students attending the University (i.e. excluding distance learners equal to around 4,00 students) either live on-campus, in Coventry City or in Warwick District with students in the latter living principally in Leamington. The University states that around 6,000 Warwick University students live in Leamington.

13.142 Icení has again drilled into data gathered by HESA to better understand students' term-time accommodation preferences. As expected, this shows that the majority of first year UG students live in one of the 7,500 bedspaces on-campus with returning UG students and PG living in HMOs or PBSA.

Table 13.13 Warwick University Full-Time Student Term-Time Accommodation (%)

Accommodation	First Year UG	Returning UG	All PG
University Owned Halls	85%	18%	24%
Private Sector Halls	0%	2%	3%
Parents Home	5%	4%	15%
HMOs	3%	53%	31%
Own Residence	2%	9%	12%
Other	2%	12%	9%
Not Known	2%	2%	7%

Source: HESA, 2020/21

13.143 As is the case in Coventry City, there has been a focus on delivering large quantities of PBSA albeit to a much smaller scale in absolute terms. The University's accommodation team has stated that all of the PBSA built on the collar of the University is full; also noting that, in line with the trend in Coventry, more students are choosing to live in PBSA as opposed to HMOs.

13.144 It was also noted however that for Warwick students, Coventry City is seen as being too far with the preference to be on or very close to campus or alternatively, live in Leamington owing to the area's character and appearance, as well as nightlife. As a result, the bulk of the PBSA market in Coventry City is being taken up by Coventry University students only.

13.145 The Table below sets out PBSA schemes delivered in recent years and shows that 929 bedspaces have been delivered since 2017/18 and there is forthcoming provision for another 292 bedspaces in Warwick District in the coming years.

Table 13.14 Purpose-Built Student Accommodation, Bedspaces

	Completed	Committed
2017/18	329	
2018/19	148	
2019/20	275	
2020/21	177	
2021/22		92
2022/23		200
2023/24		0

13.146 The University is currently in the midst of developing its Strategy looking ahead to 2030 and is due to share its draft strategy and accompanying masterplan with the District Council in spring 2022. The document will include a target number with regards to student growth; however, at this stage, Icen has been informed that the University intends to increase numbers at a “sustainable moderate growth” rate. The approach to housing all first year UG students will be maintained and there is a desire to also offer some additional accommodation to returning students.

13.147 In terms of the impact on housing, it is not clear at this stage due to the ongoing development of the University Strategy and Masterplan and as stated, the University has confirmed that they are currently working to develop the Strategy and are engaged with Warwick District Council in doing so. The Council should therefore continue to work with the University and monitor the situation until a clear vision is established.

The Policy Response

13.148 Overall, it is clear that Coventry City and Warwick District and their respective Universities has seen significant growth in students over the last decade; and the growth has been particularly in full-time students which have the greatest impact on the housing market. Over the 2011-21 period, Coventry University increased its full-time student population by 14,270 students group-wide and Warwick University by 5,735 students.

13.149 Coventry University owns and provides for around 2,500 bedspaces whilst Warwick University has 7,500 bedspaces on-campus which are all guaranteed for first year UG students and a small proportion of other student groups. In terms of the former, the University has seen growth on the back of a significant investment programme in new facilities accompanied by student accommodation provision in the City. A substantial amount of PBSA has also come forward in the City with a significant pipeline due to be built out in the next 3 years whilst Warwick has also seen a number of PBSA schemes come forward.

13.150 Looking ahead, Coventry City intends to continue to focus on the international market and growing its international student population; however, over the next 2-3 years, it is expected that student

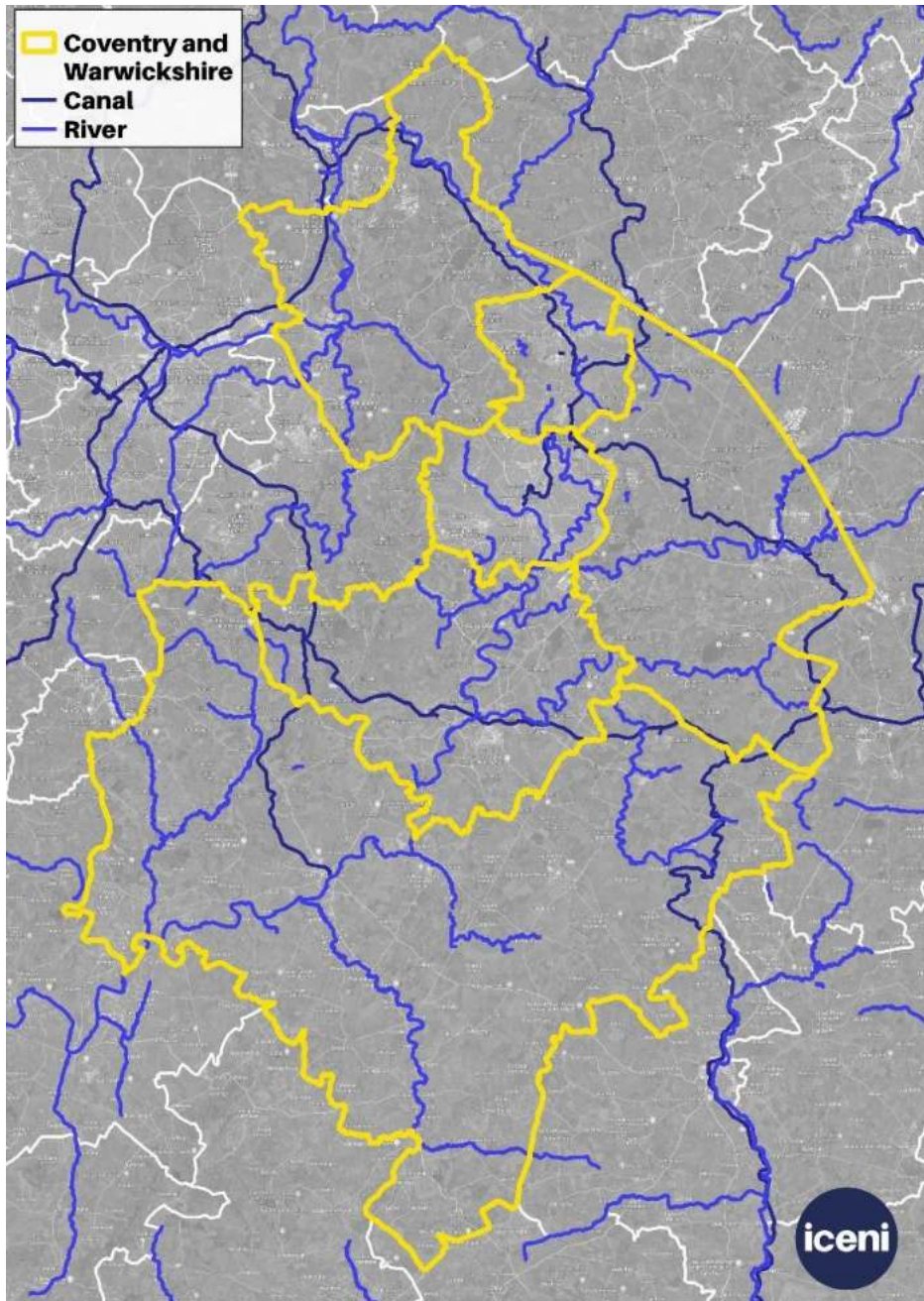
numbers will remain fairly static. As noted, there is a significant pipeline of PBSA and as a result, it is not considered that any intervention from the Council is necessary at this stage. However, as the University's Growth Strategy develops, there will be a need to revisit and engage which can be picked up as part of developing the final HEDNA.

- 13.151 Similarly, there will be a need to reconsult with Warwick University as the Strategy and accompanying masterplan is still being developed. At this stage, we have been informed that the University intends to continue with "sustainable moderate growth"; however, until the vision becomes clear, it is challenging to advise on whether any intervention is necessary. The University intends on sharing the draft plans with the District Council in spring 2022 and this will provide Iceni with the opportunity to revisit the position before the HEDNA is finalised.

Caravans and Houseboats Dwellers

13.152 According to the Canals and Rivers Trust, across the West Midlands there is 520 miles of canals and as illustrated in the map below this includes considerable coverage within the study area and in each of the local authorities.

Figure 13.13: Canals and Rivers in Coventry and Warwickshire



13.153 The Association of Inland Navigation Authorities (“AINA”) is the industry body in Great Britain for those authorities with statutory or other legal responsibility for the management and operation of navigable inland waterways.

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- 13.154 They have produced a range of reports including⁴⁶ in 2008 a survey based report titled “Numbers of Boats on the Inland Waterways”. The report recognises that “there has been a lack of definitive nationwide statistics on boat numbers, their locations, their moorings and their use.” In response AINA commissioned a study to look at two of the key components of the inland waterways - the numbers and types of boats on them and the numbers of moorings available.
- 13.155 Unfortunately, the data relating to canals in Coventry and Warwickshire was not reported but the navigation authority, British Waterways, did report for their network of 2,929 km of canals. Since that time British Waterways ceased to exist and was replaced by the Canal and River Trust.
- 13.156 The report for British Waterways shows that total boat numbers on their network grew by an average annual rate of just over 4% between 2002 and 2007. It also noted that the number of holiday hire boats remained stable over the period, but there was a significant expansion in trip, restaurant and community boats.
- 13.157 Overall, leisure business boat licenses nearly doubled over the five years. Within the private powered boat sector, growth was particularly strong amongst continuous cruisers and other residential boaters.
- 13.158 The total number of boats on the network in 2007 was 32,604 an increase of around 7,000 since 2002. This included 29,289 powered boats, 708 unpowered boats, 1,573 trip/restaurant boats, 996 hire boats and 38 unpowered day hire boats.
- 13.159 In terms of moorings the British Waterways reported that there were 24,714 moorings on their network and a further 3,100 vessels that were without a home mooring as they were in continuous use. The majority of this supply was private and 5,188 were owned by British Waterways.
- 13.160 AINA also produced a further advisory report⁴⁷ in 2011 called the “Residential Use of Inland Waterways”. This report examined those using boats as their main residential location. The report acknowledges that “there is currently a strong demand for residential moorings but a scarce supply of suitable berths”. The report provides examples of different types of vessels or structures in ‘residential use’ including
- Conventional vessels - These are boats that have originally been designed and built for navigation, the majority are cabin cruisers, narrow boats or wide-beam vessels e.g. barges.

⁴⁶ Numbers of Boats on the Inland Waterways

⁴⁷ <https://aina.org.uk/wp-content/uploads/2018/04/RUIW-Feb11.pdf>

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- Vessels not capable of navigation - Vessels that have been modified (e.g. engines removed and/or interior altered) and vessels that are simply too large to navigate the waterway
 - Floating structures not capable of navigation - Simply accommodation constructed to float on water.
 - Houseboat - A static vessel or purpose-built floating structure with no form of mechanical propulsion used, or designed for use, for residential purposes.

13.161 However, the report recognises that the term “houseboat” is sometimes used to refer to any of the other types of vessels and structures that are in residential use. The report also provides an outline of each the different types of moorings. These are

- Long-term / home mooring / mooring base - This is a mooring which comprises the usual ‘parking place’ for a vessel, from which it may or may not go cruising. This type of mooring will often be allocated to and/or occupied by a single identifiable vessel for a long period (e.g. one year or longer).
- Residential mooring - This is a long-term/mooring base for a vessel or floating structure with planning permission and navigation authority consent for use as a person’s sole or main residence. The vessel may leave the mooring from time to time to go cruising, undergo repair etc. for any period of time.
- Visitor / short-stay mooring - This type of mooring is specifically designated for boats to stop off or stay at for short periods whilst out cruising, usually for a maximum specified period.
- Casual mooring – this type of mooring occurs where boats tie up casually anywhere along the towpath or riverbank. Usually there is a general rule specifying the maximum period for casually mooring in one place (e.g. up to 14 days on waterways owned and managed by British Waterways)

13.162 The report notes that the 2008 boaters’ survey conducted by British Waterways included the question “Is your boat your main residence?” and that 18% answered yes as main or Monday-Friday residence, and extrapolating this to the approximately 30,000 privately licensed boats, British Waterways estimates that approximately 5,400 boats on its waterways are used for residential purposes.

13.163 If this number increased by 4% each year as was the estimated growth in the 2002 – 2007 period then there would be 8,991 boats used as a main residence. Extrapolating this figure further to 2040 would result in an increase to 18,994 boats used as a main residence.

13.164 Although this is purely an extrapolation and there is no evidence to suggest how high this number actually is or will be. Furthermore, these figures are for the whole British Waterways Network which Coventry and Warwickshire only comprises a small but notable part of.

13.165 The report then goes on to make a number of recommendations including:

“Some minority household groups are the subject of planning guidance such as Circulars, and a similar approach could help to ensure that the relevant issues specific to people living afloat are appropriately addressed by local authorities in both local housing and planning policy making as well as in development control.

Local authorities therefore have a responsibility to make well-informed planning decisions, using all the ‘tools’ available to them, including this advisory document. They should consult the relevant navigation authority and take into account their statutory duties, policies and any guidelines and local plans. They should also engage with all stake-holders at an early stage to understand the range of issues.

More generally, planning for residential moorings is most suitably dealt with when developing waterway strategies, local area development plans or similar; these plans should consider all types of moorings (residential, leisure, commercial and visitor moorings) and make appropriate provision for them within a local strategic context”

13.166 The Canal and River Trust have recently published⁴⁸ their annual report for the West Midlands. This noted that in 2020/21 there was record numbers of boat movements and that 7,386 boats use the canals each year. This would equate to around one quarter of the boats on the British Waterways network in the 2007.

13.167 To illustrate the supply and demand of moorings in the study area we have used the Canal and River Trusts Waterside Moorings search function.⁴⁹ This is based on a five mile radius from a search location as such there will be some overlap and also some supply outside of the area. As shown in the Table below, there are only 14 available moorings out of 202 in the five miles from each boroughs main settlement.

⁴⁸ <https://canalrivertrust.org.uk/refresh/media/original/44126-west-midlands-annual-report-2020-21.pdf>

⁴⁹ <https://www.watersidemoorings.com/Search?DistanceMiles=0&Coordinates=55.3781%2C->

3.436&tab=&Availability=availablenow&Availability=availablesoon&Availability=occupied&BerthUse=Leisure&BerthUse=Residential

Table 13.15 Moorings within 5 Mile Radius of Major Settlements

	Available	Occupied	Total
Coventry	8	89	97
Coleshill	0	25	0
Nuneaton	2	48	50
Rugby	3	12	15
Stratford-upon-Avon	0	11	11
Warwick	1	3	4
Total	14	188	202

13.168 Given the growing demand for moorings and the relatively low level of vacancies the Councils should work with the relevant authorities (Canal and River Trust) to identify additional residential moorings in the study area.

14. HOUSING NEEDS OF OLDER PEOPLE & THOSE WITH DISABILITIES

Introduction

- 14.1 This section studies the characteristics and housing needs of the older person population and the population with some form of disability. The two groups are taken together as there is a clear link between age and disability. It responds to Planning Practice Guidance on *Housing for Older and Disabled People* published by Government in June 2019. It includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards).

Understanding the Implications of Demographic Change

- 14.2 The population of older persons is increasing, and this will potentially drive a need for housing which is capable of meeting the needs of older persons. Initially below a series of statistics about the older person population of Coventry-Warwickshire are presented.

Current Population of Older People

- 14.3 The table below provides baseline population data about older persons in the study area and compares this with other areas. The population data has been taken from the 2021 Census and shows Coventry-Warwickshire has a similar age structure to other areas with 18% of the population being aged 65 and over.

Table 14.1 Older Persons Population, 2021

	Coventry-Warwickshire	West Midlands	England
Under 65	81.6%	81.2%	81.6%
65-74	9.5%	9.9%	9.8%
75-84	6.4%	6.4%	6.1%
85+	2.4%	2.5%	2.4%
Total	100.0%	100.0%	100.0%
Total 65+	18.4%	18.8%	18.4%
Total 75+	8.8%	8.9%	8.6%

Source: 2011 Census

- 14.4 The table below shows the same information for local authorities, this shows some notable variation in the proportion of people aged 65 and over, ranging from 15% in Coventry, up to 25% of the population of Stratford-on-Avon.

Table 14.2 Older Persons Population, 2021 – local authorities

	Under 65	65-74	75-84	85+	Total	Total 65+	Total 75+
Coventry	85.4%	7.6%	5.0%	2.0%	100.0%	14.6%	7.0%
North Warwickshire	78.1%	11.9%	7.4%	2.6%	100.0%	21.9%	10.0%
Nuneaton & Bedworth	80.9%	10.3%	6.5%	2.2%	100.0%	19.1%	8.8%
Rugby	81.9%	9.2%	6.6%	2.4%	100.0%	18.1%	8.9%
Stratford-on-Avon	74.8%	12.9%	8.9%	3.4%	100.0%	25.2%	12.3%
Warwick	81.1%	9.6%	6.5%	2.7%	100.0%	18.9%	9.2%
Warwickshire	79.5%	10.7%	7.2%	2.7%	100.0%	20.5%	9.9%
Coventry-Warwickshire	81.6%	9.5%	6.4%	2.4%	100.0%	18.4%	8.8%

Source: 2011 Census

Projected Future Change in the Population of Older People

14.5 Population projections can next be used to provide an indication of how the number of older persons might change in the future with the table below showing that Coventry and Warwickshire is projected to see a notable increase in the older person population. Using the trend-based projection developed the increase in the population aged 65 and over is around 18% - the population aged Under 65 is in contrast projected to increase by just 4%.

14.6 In total population terms, the projections show an increase in the population aged 65 and over of 32,400 people. This is against a backdrop of an overall increase of 60,600 – population growth of people aged 65 and over therefore accounts for 54% of the total projected population change.

Table 14.3 Projected Change in Population of Older Persons, 2022 to 2032 – trend-based projection

	2022	2032	Change in population	% change
Under 65	773,293	801,480	28,186	3.6%
65-74	90,924	106,300	15,376	16.9%
75-84	62,125	72,266	10,141	16.3%
85+	23,686	30,614	6,928	29.2%
Total	950,029	1,010,661	60,632	6.4%
Total 65+	176,736	209,181	32,446	18.4%
Total 75+	85,811	102,881	17,069	19.9%

Source: Demographic Projections

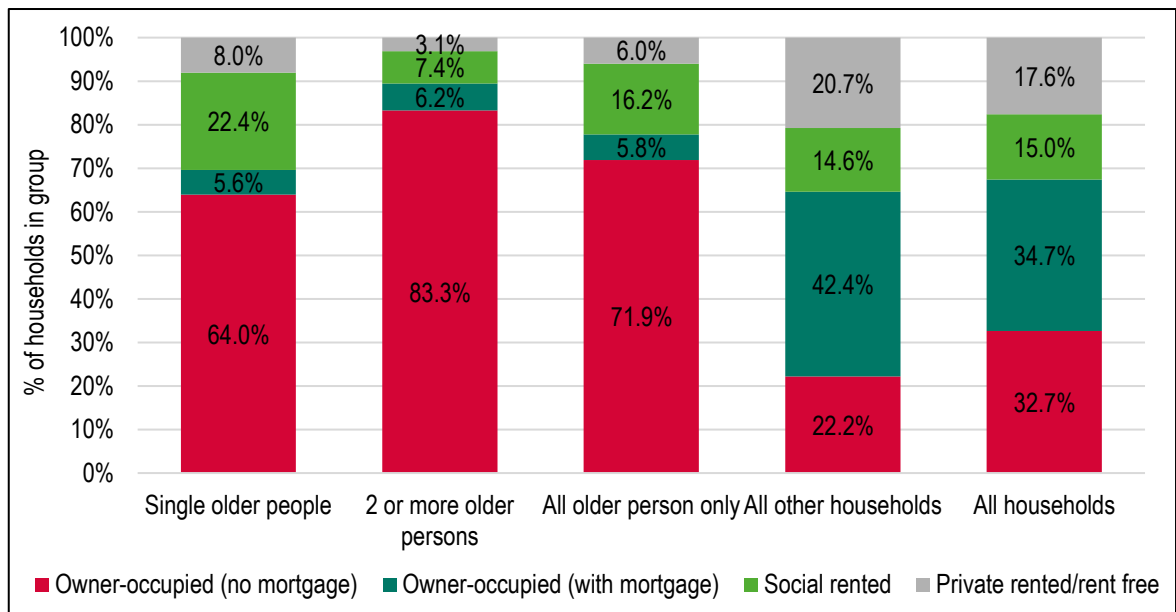
Characteristics of Older Person Households

14.7 The figure below shows the tenure of older person households. The data has been split between single older person households and those with two or more older people (which will largely be couples). The data shows that the majority of older persons households are owner occupiers (78% of older person households), and indeed most are owner occupiers with no mortgage and thus may

have significant equity which can be put towards the purchase of a new home. Some 16% of older persons households across the study area live in the social rented sector; the proportion of older person households living in the private rented sector is relatively low (about 6%).

- 14.8 There are also notable differences for different types of older person households with single older people having a much lower level of owner-occupation than larger older person households – this group also has a much higher proportion living in the social rented sector.

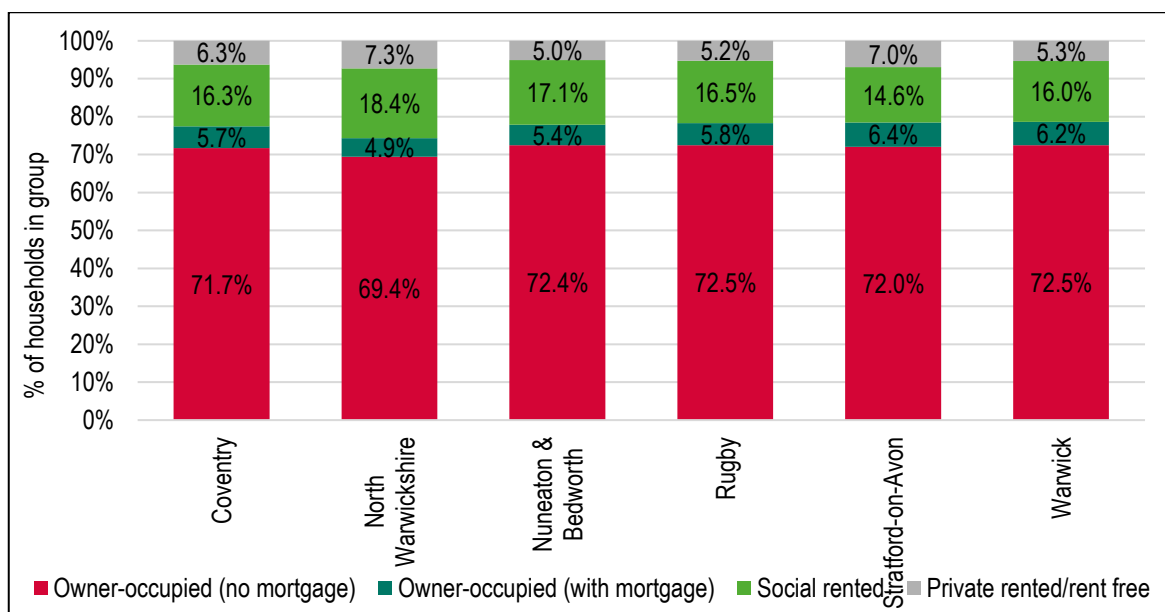
Figure 14.1: Tenure of Older Persons Households in Coventry-Warwickshire, 2011



Source: 2011 Census

- 14.9 The figure below shows the same information for local authorities – the data is provided for all older person households. The data shows that the tenure profile of older person households is similar across the study area, with all locations seeing the majority of older person households being owners-occupiers and low numbers in the private rented sector.

Figure 14.2: Tenure of Older Persons Households in Coventry-Warwickshire, 2011 – local authorities



Source: 2011 Census

Prevalence of Disabilities

14.10 The table below shows the proportion of people with a long-term health problem or disability (LTHPD) drawn from 2011 Census data, and the proportion of households where at least one person has a LTHPD. The data suggests that some 32% of households in Coventry-Warwickshire contain someone with a LTHPD. This figure is slightly lower than seen regionally, and virtually the same as the national average. The figures for the population with a LTHPD also typically show the same trends when compared with other locations – some 17% of the population having a LTHPD.

Table 14.4 Households and People with a Long-Term Health Problem or Disability, 2011

	Households Containing Someone with a Health Problem		Population with a Health Problem	
	No.	%	No.	%
Coventry-Warwickshire	115,721	32.2%	149,420	17.3%
West Midlands	810,722	35.3%	1,062,064	19.0%
England	7,217,905	32.7%	9,352,586	17.6%

Source: 2011 Census

14.11 The analysis also shows some differences between different parts of the study area, with Nuneaton & Bedworth seeing a higher proportion of population and households with a LTHPD.

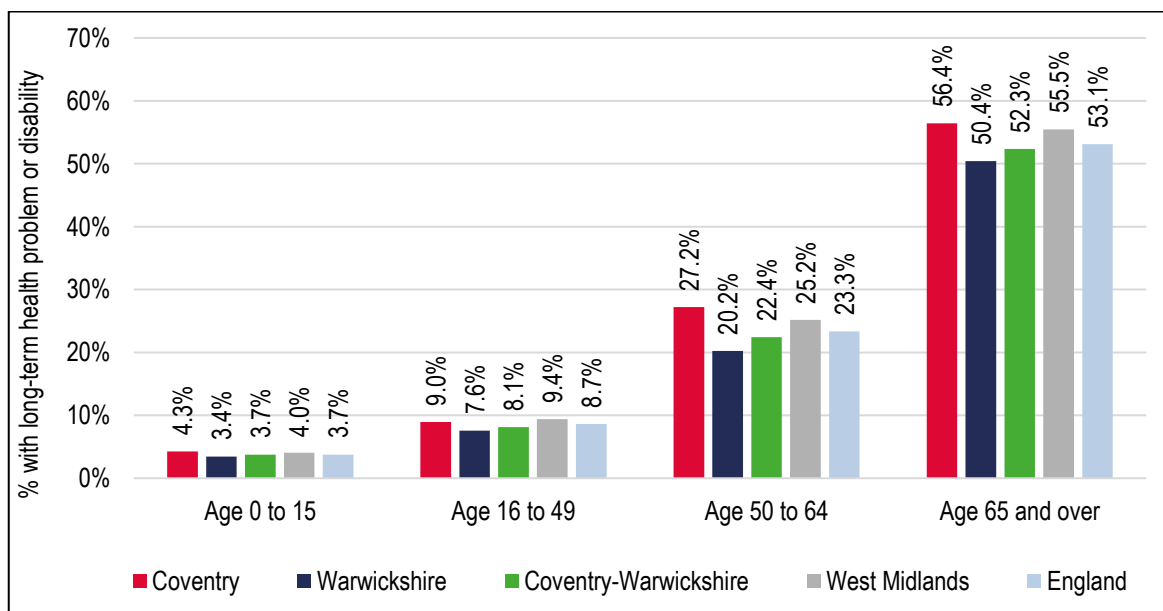
Table 14.5 Households and People with a Long-Term Health Problem or Disability, 2011 – sub-areas – Coventry-Warwickshire

	Households Containing Someone with a Health Problem		Population with a Health Problem	
	No.	%	No.	%
Coventry	43,584	33.9%	56,247	17.7%
North Warwickshire	9,061	35.1%	11,936	19.2%
Nuneaton & Bedworth	18,669	35.4%	24,379	19.5%
Rugby	12,581	30.0%	16,114	16.1%
Stratford-on-Avon	15,784	30.4%	20,334	16.9%
Warwick	16,042	27.3%	20,410	14.8%
Warwickshire	72,137	31.2%	93,173	17.1%
Coventry-Warwickshire	115,721	32.2%	149,420	17.3%

Source: 2011 Census

14.12 As noted, it is likely that the age profile will impact upon the numbers of people with a LTHPD, as older people tend to be more likely to have a LTHPD. The figure below shows the age bands of people with a LTHPD. It is clear from this analysis that those people in the oldest age bands are more likely to have a LTHPD. The analysis also typically shows higher levels of LTHPD in each age band in Coventry when compared with the regional and national position.

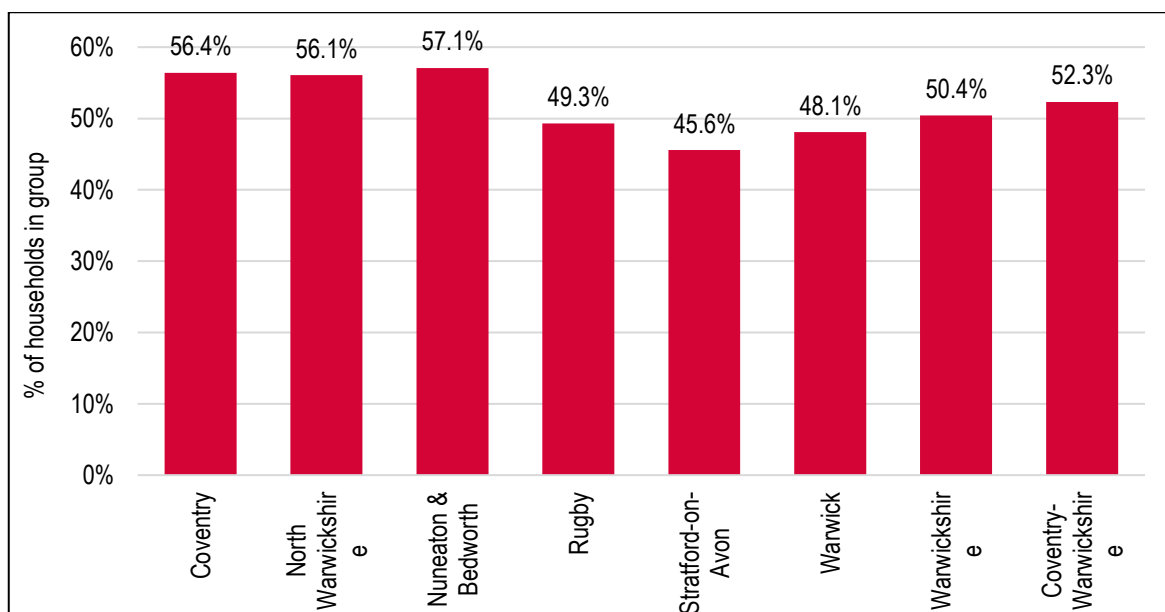
Figure 14.3: Population with Long-Term Health Problem or Disability by Age



Source: 2011 Census

14.13 The figure below shows the proportion of the population aged 65 and over with a LTHPD by local authority – this shows higher levels of disability in Coventry and Nuneaton & Bedworth, with much lower figures in Stratford-on-Avon and Warwick.

Figure 14.4: Proportion of population aged 65 and over with a Long-Term Health Problem or Disability – local authorities



Source: 2011 Census

Health Related Population Projections

- 14.14 The incidence of a range of health conditions is an important component in understanding the potential need for care or support for a growing older population.
- 14.15 The analysis undertaken covers both younger and older age groups and draws on prevalence rates from the PANSI (Projecting Adult Needs and Service Information) and POPPI (Projecting Older People Population Information) websites. Adjustments have been made to take account of the age specific health/disabilities previously shown.
- 14.16 Of particular note are the large increases in the number of older people with dementia (increasing by 21% from 2022 to 2032 and mobility problems (up 20% over the same period). Changes for younger age groups are smaller, reflecting the fact that projections are expecting older age groups to see the greatest proportional increases in population. When related back to the total projected change to the population, the increase of people aged 65+ with a mobility problem represents 11% of total projected population growth.
- 14.17 It should be noted that there will be an overlap between categories (i.e. some people will have both dementia and mobility problems). Hence the numbers for each of the illnesses/disabilities should not be added together to arrive at a total.

Table 14.6 Projected Changes to Population with a Range of Disabilities – Coventry-Warwickshire

Disability	Age Range	2022	2032	Change	% Change
Dementia	65+	12,143	14,720	2,577	21.2%
Mobility problems	65+	31,912	38,350	6,438	20.2%
Autistic Spectrum Disorders	18-64	5,502	5,857	355	6.4%
	65+	1,626	1,933	307	18.9%
Learning Disabilities	15-64	14,244	15,062	818	5.7%
	65+	3,609	4,234	624	17.3%
Challenging behaviour	15-64	261	275	14	5.5%
Impaired mobility	16-64	29,111	29,753	642	2.2%

Source: POPPI/PANSI and Demographic Projections

- 14.18 Invariably, there will be a combination of those with disabilities and long-term health problems that continue to live at home with family, those who chose to live independently with the possibility of incorporating adaptations into their homes and those who choose to move into supported housing.
- 14.19 The projected change shown in the number of people with disabilities provides clear evidence justifying delivering ‘accessible and adaptable’ homes as defined in Part M4(2) of Building Regulations, subject to viability and site suitability. The Council should ensure that the viability of doing so is also tested as part of drawing together its evidence base although the cost of meeting this standard is unlikely to have any significant impact on viability and would potentially provide a greater number of homes that will allow households to remain in the same property for longer.

Need for Specialist Accommodation for Older Persons

- 14.20 Given the ageing population and higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing options moving forward. The box below shows the different types of older persons housing which are considered.

Definitions of Different Types of Older Persons' Accommodation

Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services.

Retirement living or sheltered housing (housing with support): This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24-hour on-site assistance (alarm) and a warden or house manager.

Extra care housing or housing-with-care (housing with care): This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

Residential care homes and nursing homes (care bedspaces): These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

Source: *Planning Practice Guidance* [63-010]

- 14.21 The need for specialist housing for older persons is typically modelled by applying prevalence rates to current and projected population changes and considering the level of existing supply. There is no standard methodology for assessing the housing and care needs of older people. The current and future demand for elderly care is influenced by a host of factors including the balance between demand and supply in any given area and social, political, regulatory and financial issues. Additionally, the extent to which new homes are built to accessible and adaptable standards may over time have an impact on specialist demand (given that older people often want to remain at home rather than move to care) – this will need to be monitored.
- 14.22 There are a number of 'models' for considering older persons' needs, but they all essentially work in the same way. The model results are however particularly sensitive to the prevalence rates applied, which are typically calculated as a proportion of people aged over 75 who could be expected to live in different forms of specialist housing. Whilst the population aged 75 and over is used in the modelling, the estimates of need would include people of all ages.
- 14.23 Whilst there are no definitive rates, the PPG [63-004] notes that *'the future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector, for example SHOP@ for Older People Analysis Tool'*. The PPG does not specifically mention any other tools and therefore seems to be indicating that SHOP@ would be a good starting point for analysis. Since the PPG was published the Housing Learning and Information Network (Housing LIN) has removed the Shop@ online toolkit although the base rates used for analysis are known.

14.24 The SHOP@ tool was originally based on data in a 2008 report (More Choice Greater Voice) and in 2011 a further suggested set of rates was published (rates which were repeated in a 2012 publications). In 2016, Housing LIN published a review document which noted that the 2008 rates are 'outdated' but also noting that the rates from 2011/12 were 'not substantiated'. The 2016 review document therefore set out a series of proposals for new rates to be taken forward onto the Housing LIN website.

14.25 Whilst the 2016 review rates do not appear to have ever led to an update of the website, it does appear from reviewing work by Housing LIN over the past couple of years as if it is these rates which typically inform their own analysis (subject to evidence based localised adjustments).

14.26 For clarity, the table below shows the base prevalence rates set out in the various documents described above. For the analysis in this report the age-restricted and retirement/sheltered have been merged into a single category (housing with support).

Table 14.7 Range of suggested baseline prevalence rates from a number of tools and publications

Type/Rate	SHOP@ (2008) ⁵⁰	Housing in Later Life (2012) ⁵¹	2016 Housing LIN Review
Age-restricted general market housing	-	-	25
Retirement living or sheltered housing (housing with support)	125	180	100
Extra care housing or housing-with-care (housing with care)	45	65	30-40 ('proactive range')
Residential care homes	65	(no figure apart from 6 for dementia)	40
Nursing homes (care bedspaces), including dementia	45		45

Source: Range of sources as identified

14.27 In interpreting the different potential prevalence rates it is clear that:

- The prevalence rates used should be considered and assessed taking account of an authority's strategy for delivering specialist housing for older people. The degree for instance which the Council want to require extra care housing as an alternative to residential care provision would influence the relative balance of need between these two housing types;

⁵⁰ Based on the More Choice Greater Voice publication of 2008 (https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Reports/MCGVdocument.pdf). It should be noted that although these rates are from 2008, they are the same rates as were being used in the online toolkit when it was taken offline in 2019.

⁵¹ https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Toolkit/Housing_in_Later_Life_Toolkit.pdf

- The Housing LIN model has been influenced by existing levels of provision and their view on what future level of provision might be reasonable taking account of how the market is developing, funding availability etc. It is more focused towards publicly commissioned provision. There is a degree to which the model and assumptions within it may not fully capture the growing recent private sector interest and involvement in the sector, particularly in extra care; and
- The assumptions in these studies look at the situation nationally. At a more local level, the relative health of an area's population is likely to influence the need for specialist housing with better levels of health likely to mean residents are able to stay in their own homes for longer

14.28 Icen and JGC have therefore sought to consider these issues and the appropriate modelling assumptions for assessing future needs. Nationally, there has been a clear focus on strengthening a community-led approach and reducing reliance on residential and nursing care – in particular focussing where possible on providing households with care in their own home. This could however be provision of care within general needs housing; but also care which is provided in a housing with care development such as in extra care housing.

14.29 We consider that the prevalence rates shown in the 2016 Housing LIN Review is an appropriate starting point; but that the corollary of lower care home provision should be a greater focus on delivery of housing with care. Having regard to market growth in this sector in recent years, and since the above studies were prepared, we consider that the starting point for housing with care should be the higher rate shown in the SHOP@ report (this is the figure that would align with the PPG).

14.30 Rather than simply taking the base prevalence rates, an initial adjustment has been made to reflect the relative health of the local older person population. This has been based on Census data about the proportion of the population aged 65 and over who have a long-term health problem or disability (LTHPD) compared with the England average. Calculations are based on comparing the proportion of people aged 65 and over with a LTHPD (56.4% in the case of Coventry) with the equivalent figure for England (53.1%). The table below also shows data from the Index of Multiple Deprivation (IMD) which is used to determine the local tenure split (discussed below).

Table 14.8 Data on health adjustments and Index of Multiple Deprivation

	% 65+ with LTHPD	Health adjustment	2019 IMD (rank of 317)
Coventry	56.4%	106.2%	81
North Warwickshire	56.1%	105.5%	155
Nuneaton & Bedworth	57.1%	107.4%	101
Rugby	49.3%	92.8%	222
Stratford-on-Avon	45.6%	85.8%	259
Warwick	48.1%	90.5%	263

Source: 2011 Census and Index of Multiple Deprivation

14.31 A second local adjustment has been to estimate a tenure split for the housing with support and housing with care categories. This again draws on suggestions in the 2016 Review which suggests that less deprived local authorities could expect a higher proportion of their specialist housing to be in the market sector. Using 2019 Index of Multiple Deprivation (IMD) data, the analysis suggests Coventry is the 81st most deprived local authority in England (out of 317). This suggests a greater proportion of affordable housing than for an authority in the middle of the range. Authorities with relatively low deprivation might therefore be expected to see a higher proportion of market housing. To be clear this is market housing within the categories described above (e.g. housing with support and housing with care).

14.32 The table below shows the prevalence rates used in analysis with adjustments for health and deprivation. This shows higher needs for affordable housing in Coventry and Nuneaton & Bedworth, with other areas having higher prevalence in the market sector. As noted, this reflects the health of the local and deprivation although it is interesting to also note that Coventry was shown above to have a much lower proportion of older people as owner-occupiers than in other locations.

Table 14.9 Prevalence rates used in analysis of older person needs – Coventry-Warwickshire (rates per 1,000 population aged 75+)

	Housing with support		Housing with care		Residential care	Nursing care
	Market	Affordable	Market	Affordable		
Coventry	40	93	21	27	42	48
North Warwickshire	54	78	28	20	42	47
Nuneaton & Bedworth	43	91	24	25	43	48
Rugby	60	56	28	13	37	42
Stratford-on-Avon	62	45	27	11	34	39
Warwick	66	47	29	12	36	41

Source: Range of sources

14.33 The tables below show estimated needs for different types of housing linked to the population projections. The analysis is separated into the various different types and tenures although it should be recognised that there could be some overlap between categories (i.e. some households might be suited to more than one type of accommodation).

14.34 Overall, the analysis suggests that there will be a notable need for both housing with support and housing with care (in both market and affordable sectors), as well as some additional nursing and residential care bedspaces. In Coventry the need is particularly for affordable housing (housing with support), with the opposite being the case in Warwickshire.

Table 14.10 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – Coventry

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	40	462	970	508	104	612
	Affordable	93	1,168	2,274	1,106	245	1,350
Total (housing with support)		133	1,630	3,244	1,614	349	1,963
Housing with care	Market	21	210	514	304	55	360
	Affordable	27	855	653	-202	70	-131
Total (housing with care)		48	1,065	1,168	103	126	228
Residential care bedspaces		42	1,203	1,038	-165	112	-53
Nursing care bedspaces		48	567	1,168	601	126	726
Total bedspaces		90	1,770	2,206	436	238	673

Source: Derived from Demographic Projections and Housing LIN/EAC

Table 14.11 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – Warwickshire

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	58	1,913	3,560	1,647	843	2,490
	Affordable	60	5,198	3,695	-1,503	848	-655
Total (housing with support)		118	7,111	7,255	144	1,691	1,836
Housing with care	Market	27	721	1,665	944	392	1,336
	Affordable	15	477	947	470	217	687
Total (housing with care)		43	1,198	2,612	1,414	609	2,023
Residential care bedspaces		38	2,253	2,322	69	541	610
Nursing care bedspaces		43	2,261	2,612	351	609	960
Total bedspaces		80	4,514	4,934	420	1,150	1,570

Source: Derived from Demographic Projections and Housing LIN/EAC

14.35 The series of tables below provide the same information for each local authority (excluding Coventry).

Table 14.12 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – North Warwickshire

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	54	124	373	249	70	319
	Affordable	78	1,270	538	-732	101	-630
Total (housing with support)		132	1,394	911	-483	172	-311
Housing with care	Market	28	0	190	190	36	226
	Affordable	20	80	138	58	26	84
Total (housing with care)		47	80	328	248	62	310
Residential care bedspaces		42	284	292	8	55	63
Nursing care bedspaces		47	301	328	27	62	89
Total bedspaces		90	585	620	35	117	151

Source: Derived from Demographic Projections and Housing LIN/EAC

Table 14.13 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – Nuneaton & Bedworth

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	43	18	524	506	115	621
	Affordable	91	1,310	1,095	-215	241	25
Total (housing with support)		134	1,328	1,619	291	356	647
Housing with care	Market	24	123	284	161	62	224
	Affordable	25	82	298	216	66	282
Total (housing with care)		48	205	583	378	128	506
Residential care bedspaces		43	562	518	-44	114	70
Nursing care bedspaces		48	278	583	305	128	433
Total bedspaces		91	840	1,101	261	242	503

Source: Derived from Demographic Projections and Housing LIN/EAC

Table 14.14 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – Rugby

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	60	369	642	273	143	415
	Affordable	56	1,211	598	-613	133	-480
Total (housing with support)		116	1,580	1,239	-341	276	-65
Housing with care	Market	28	20	303	283	67	350
	Affordable	13	100	144	44	32	75
Total (housing with care)		42	120	446	326	99	425
Residential care bedspaces		37	389	397	8	88	96
Nursing care bedspaces		42	489	446	-43	99	56
Total bedspaces		79	878	843	-35	188	152

Source: Derived from Demographic Projections and Housing LIN/EAC

Table 14.15 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – Stratford-on-Avon

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	62	686	1,085	399	307	705
	Affordable	45	624	795	171	225	396
Total (housing with support)		107	1,310	1,880	570	532	1,101
Housing with care	Market	27	171	478	307	135	442
	Affordable	11	46	199	153	56	209
Total (housing with care)		39	217	677	460	191	651
Residential care bedspaces		34	521	602	81	170	251
Nursing care bedspaces		39	598	677	79	191	270
Total bedspaces		73	1,119	1,278	159	362	521

Source: Derived from Demographic Projections and Housing LIN/EAC

Table 14.16 Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-32 – Warwick

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall /surplus by 2032
Housing with support	Market	66	716	937	221	208	429
	Affordable	47	783	669	-114	149	35
Total (housing with support)		113	1,499	1,606	107	357	463
Housing with care	Market	29	407	410	3	91	94
	Affordable	12	169	168	-1	37	36
Total (housing with care)		41	576	578	2	128	130
Residential care bedspaces		36	497	514	17	114	131
Nursing care bedspaces		41	595	578	-17	128	111
Total bedspaces		77	1,092	1,092	0	243	242

Source: Derived from Demographic Projections and Housing L1N/EAC

14.36 It can be seen by 2032 there is an estimated need for 605 additional dwellings with support or care across the whole study area (per annum). In addition, there is a need for 224 additional nursing and residential care bedspaces. Typically for bedspaces it is conventional to convert to dwellings using a standard multiplier (1.80 bedspaces per dwelling for older persons accommodation) and this would therefore equate to around 125 dwellings. In total, the older persons analysis therefore points towards a need for around 730 units per annum over the 2022-32 period – this equates to around 19% of the housing need derived from the trend-based projection.

14.37 The table below summarises this information for local authorities. This shows some variation in need across areas, this is driven by both the demographic profile of each area and the current supply of specialist housing.

Table 14.17 Estimated proportion of need as older persons housing – linking to trend-based projections

	Housing with care/support	Bedspace allowance	Total need	Dwelling need	% as older persons
Coventry	219	37	257	1,409	18.2%
North Warwickshire	0	8	8	127	6.5%
Nuneaton & Bedworth	115	28	143	380	37.6%
Rugby	36	8	45	681	6.5%
Stratford-on-Avon	175	29	204	671	30.4%
Warwick	59	13	73	644	11.3%
Warwickshire	386	87	473	2,504	18.9%
Coventry-Warwickshire	605	125	730	3,913	18.6%

Source: Derived from a range of sources

14.38 The provision of a choice of attractive housing options to older households is a component of achieving good housing mix. The availability of such housing options for the growing older population may enable some older households to downsize from homes which no longer meet their housing needs or are expensive to run. The availability of housing options which are accessible to older people will also provide the opportunity for older households to 'rightsize' which can help improve their quality of life.

14.39 It should also be noted that within any category of need there may be a range of products. For example, many recent market extra-care schemes have tended to be focused towards the 'top-end' of the market and may have significant service charges (due to the level and quality of facilities and services). Such homes may therefore only be affordable to a small proportion of the potential market, and it will be important for the Councils to seek a range of products that will be accessible to a wider number of households if needs are to be met.

Older Persons' Housing, Planning Use Classes and Affordable Housing Policies

14.40 The issue of use classes and affordable housing generally arises in respect of extra care/ assisted living development schemes. The Planning Practice Guidance defines extra care housing or housing with care as follows:

"This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses".

14.41 There is a degree to which different terms can be used for this type of development inter-changeably, with reference sometimes made to extra care, assisted living, continuing care retirement communities, or retirement villages. Accommodation units typically include sleeping and living accommodation, bathrooms and kitchens; and have their own front door. Properties having their own front doors is not however determinative of use.

14.42 The distinguishing features of housing with care is the provision of personal care through an agency registered with the Care Quality Commission, and the inclusion of extensive facilities and communal space within these forms of development, which distinguish them from blocks of retirement flats.

Use Classes

14.43 Use classes are defined in the Town and Country Planning (Use Classes) Order 1987. Use Class C2: Residential Institutions is defined as "use for the provision of residential accommodation and care to people in need of care (other than a use within class C3 (dwelling houses))." C3 (dwelling

houses) are defined as “use as a dwelling house (whether or not as a sole or main residence) a) by a single person or by people living together as a family; or b) by no more than 6 residents living together as a single household (including a household where care is provided for residents).”

14.44 Care is defined in the Use Class Order as meaning “personal care for people in need of such care by reason of old age, disablement, past or present dependence on alcohol or drugs or past or present mental disorder, and in class C2 also includes the personal care or children and medical care and treatment.”

14.45 Personal care has been defined in Regulations⁵² as “the provision of personal care for persons who, by reasons of old age, illness or disability are unable to provide it for themselves, and which is provided in a place where those persons are living at the time the care is provided.”

14.46 Government has released new Planning Practice Guidance of *Housing for Older and Disabled People* in June 2019. In respect of Use Classes, Para 63-014 therein states that:

“It is for a local planning authority to consider into which use class a particular development may fall. When determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwelling house) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided.”

14.47 The relevant factors identified herein are the level of care which is provided, and the scale of communal facilities. It is notable that no reference is made to whether units of accommodation have separate front doors. This is consistent with the Use Class Order, where it is the ongoing provision of care which is the distinguishing feature within the C2 definition. In a C2 use, the provision of care is an essential and ongoing characteristic of the development and would normally be secured as such through the S106 Agreement.

14.48 A range of appeal decisions have addressed issues relating to how to define the use class of a development. These are fact specific, and there is a need to consider the particular nature of the scheme. What arises from this, is that schemes which have been accepted as a C2 use commonly demonstrate the following characteristics:

- Occupation restricted to people (at least one within a household) in need of personal care, with an obligation for such residents to subscribe to a minimum care package. Whilst there has been debate about the minimum level of care to which residents must sign-up to, it is considered that this should not be determinative given that a) residents’ care needs would typically change over time, and in most cases increase; and b) for those without a care need the relative costs associated with the care package would be off-putting.

⁵² Schedule 1 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2010.

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- Provision of access to a range of communal areas and facilities, typically beyond that of simply a communal lounge, with the access to these facilities typically reflected in the service charge.

NPPF Policies on Affordable Housing

- 14.49 For the purposes of developing planning policies in a new Local Plan, use class on its own need not be determinative on whether affordable housing provision could be applied. In all cases we are dealing with residential accommodation. But nor is there a clear policy basis for seeking affordable housing provision or contributions from a C2 use in the absence of a development plan policy which seeks to do so.
- 14.50 The NPPF (July 2021) sets out in paragraph 34 that Plans should set out the contributions expected from development, including levels of affordable housing. Such policies should not undermine the deliverability of the Plan. Paragraph 63 states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless off-site provision or a financial contribution can be robustly justified; and the agreed approach contributes to the objective of creating mixed and balanced communities.
- 14.51 Paragraph 64 states that affordable housing should not be sought from residential developments that are not major developments. Paragraph 65 sets out that specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students) are exempt from the requirement for 10% of homes (as part of the affordable housing contribution) to be for affordable home ownership. But neither of these paragraphs set out that certain types of specialist accommodation for older persons are exempt from affordable housing contributions.
- 14.52 The implication for Coventry-Warwickshire is that:
- The ability to seek affordable housing contributions from a C2 use at the current time is influenced by how its current development plan policies were constructed and evidenced; and
 - If policies in a new development plan are appropriately crafted and supported by the necessary evidence on need and viability, affordable housing contributions could be sought from a C2 use through policies in a new Local Plan.
- 14.53 Within the local plan, it would be possible to craft a policy in such a way that affordable housing could be sought on extra care housing from both C2 and C3 use classes and it should be noted that in July 2020 the High Court rejected claims that 'extra care' housing should not contribute affordable homes because it falls outside C3 use (CO/4682/2019). It is however important to recognise that the viability of extra care housing will differ from general mixed tenure development schemes, and there are practical issues associated with how mixed tenure schemes may operate.

Viability

14.54 There are a number of features of a typical extra care housing scheme which can result in substantively different viability characteristics relative to general housing. In particular:

- Schemes typically include a significant level of communal space and on-site facilities, such that the floorspace of individual units might equate to 65% of the total floorspace, compared to 100% for a scheme of houses and perhaps 85% for typical flatted development. There is a significant proportion of space from which value is not generated through sales (although individual units may be smaller);
- Higher construction and fit out-costs as schemes need to achieve higher accessibility requirements and often include lifts, specially adapted bathrooms, treatment rooms etc. In many instances, developers need to employ third party building contractors are also not able to secure the same economies of scale as the larger volume housebuilders;
- Sales rates are also typically slower for extra care schemes, not least as older residents are less likely to buy 'off plan.' The combination of this and the limited ability to phase flatted schemes to sales rates can result in higher finance costs for a development.

14.55 There are a number of implications arising from this. Firstly, there is a need for viability evidence to specifically test and consider what level of affordable housing could be applied to different forms of older persons accommodation, potentially making a distinction between general market housing; retirement living/sheltered housing; and extra care/housing with care. It may well be that a differential and lower affordable housing policy is justified for housing with care.

14.56 Secondly, developers of extra care schemes can struggle to secure land when competing against mainstream housebuilders or strategic land promoters. One way of dealing with this is to allocate sites specifically for specialist older persons housing, and this may be something that the Council wishes to consider through the preparation of a new Local Plan. There could be benefits of doing this through achieving relatively high-density development of land at accessible locations, and in doing so, releasing larger family housing elsewhere as residents move out.

Practical Issues

14.57 In considering policies for affordable housing provision on housing with care schemes, there is one further factor which warrants consideration relating to the practicalities of mixed-tenure schemes. The market for extra care development schemes is currently focused particularly on providers at the affordable and higher ends of the market, with limited providers currently delivering within the 'mid-market.' At the higher ends of the market, the level of facilities and services/support available can be significant, and the management model is often to recharge this through service charges.

14.58 Whilst recognising the benefits associated with mixed income/tenure development, in considering whether mixed tenure schemes can work it is important to consider the degree to which service charges will be affordable to those on lower incomes and whether Registered Providers will want or be able to support access to the range of services/facilities on site. In a range of instances, this has meant that authorities have accepted off-site contributions to affordable housing provision.

Wheelchair User Housing

14.59 Information about the need for housing for wheelchair users is difficult to obtain, particularly at a local level and estimates of need produced in this report draw on data from the English Housing Survey (EHS) which provides a range of relevant data, but often for different time periods. The EHS data used includes the age structure profile of wheelchair users, information about work needed to homes to make them 'visitable' for wheelchair users and data about wheelchair users by tenure.

14.60 The analysis below sets out estimates of the number of wheelchair users in each local authority; this has been based on estimating prevalence rates from the 2011-12 EHS (Annex Table 6.11) combined with Census data. At the time, the EHS showed there were 184,000 households with a wheelchair user and the oldest person in the household was aged under 60; the 2011 Census showed a households population of 40.6 million people aged under 60 and therefore a base prevalence rate of 0.005 has been calculated for this group – essentially for every 1,000 people aged under 60 there are around 5 wheelchair user households. The table below shows data for a full range of age groups; it should be noted that whilst the prevalence rates mix households and population they will provide a reasonable estimate of the number of wheelchair user households.

Table 14.18 Baseline prevalence rates by age used to estimate wheelchair user households – England

	Number of wheelchair user households	Household population	Prevalence (per 1,000 population)
under 60 years	184,000	40,562,000	5
60 - 74 years	205,000	7,668,000	27
75 - 84 years	191,000	2,832,000	68
85 years or over	146,000	997,000	146

Source: Derived from EHS (2011-12) and 2011 Census

14.61 The analysis also considers the relative health of the population of Coventry-Warwickshire. For this, data has been taken from the 2011 Census for the household population with 'day to day activities limited a lot' by their disability. The tables below show this information by age in the study area and England, and also shows the adjustment made to reflect differences in health between the areas. Due to the age bands used in the Census, there has been some degree of adjustment for the under 60 and 60-74 age groups. The data shows higher levels of disability for all age groups in Coventry,

pointing to a slightly higher than average proportion of wheelchair user households – the opposite is largely true for Warwickshire although there will be variations across local authorities in the County.

Table 14.19 Proportion of people with day to day activities limited a lot (by age) – 2011 – Coventry

	% of age group with day to day activities limited a lot		Coventry as % of England	Prevalence rate (per 1,000 population)
	Coventry	England		
under 60 years	4.6%	4.2%	110.2%	5
60-74 years	16.8%	13.9%	120.8%	32
75-84 years	31.9%	29.1%	109.5%	74
85 years or over	57.1%	52.3%	109.1%	159

Source: 2011 Census

Table 14.20 Proportion of people with day to day activities limited a lot (by age) – 2011 – Warwickshire

	% of age group with day to day activities limited a lot		Warwickshire as % of England	Prevalence rate (per 1,000 population)
	Warwickshire	England		
under 60 years	3.5%	4.2%	83.7%	4
60-74 years	11.6%	13.9%	83.6%	22
75-84 years	27.4%	29.1%	94.1%	64
85 years or over	52.3%	52.3%	99.9%	146

Source: 2011 Census

14.62 The local prevalence rate data can be brought together with information about the population age structure and how this is likely to change moving forward. For Coventry, the data estimates a total of 4,987 wheelchair user households in 2022, and that this will rise to 5,541 by 2032 (an increase of 554). For Warwickshire, the current number of wheelchair users is put at 8,755 in 2022, increasing to 10,437 by 2032.

Table 14.21 Estimated number of wheelchair user households (2022-32) – Coventry

	Prevalence rate (per 1,000 population)	Household population 2022	Household population 2032	Wheelchair user households (2022)	Wheelchair user households (2032)
under 60 years	5	272,686	287,176	1,362	1,435
60 - 74 years	32	42,956	50,817	1,386	1,639
75 - 84 years	74	16,985	19,038	1,257	1,408
85 years or over	159	6,158	6,641	982	1,059
Total		338,784	363,672	4,987	5,541

Source: Derived from a range of sources

Table 14.22 Estimated number of wheelchair user households (2022-32) – Warwickshire

	Prevalence rate (per 1,000 population)	Household population 2022	Household population 2032	Wheelchair user households (2022)	Wheelchair user households (2032)
under 60 years	4	435,057	441,126	1,651	1,674
60 - 74 years	22	100,597	115,742	2,245	2,583
75 - 84 years	64	43,425	51,089	2,759	3,246
85 years or over	146	14,373	20,082	2,100	2,935
Total		593,452	628,039	8,755	10,437

Source: Derived from a range of sources

- 14.63 The finding of an estimated current number of wheelchair user households does not indicate how many homes might be needed for this group – some households will be living in a home that is suitable for wheelchair use, whilst others may need improvements to accommodation, or a move to an alternative home. Data from the EHS (2014-15) shows that of the 814,000 wheelchair user households, some 200,000 live in a home that would either be problematic or not feasible to make fully ‘visitable’ – this is around 25% of wheelchair user households. Applying this to the current number of wheelchair user households and adding the additional number projected forward suggests a need for 178 additional wheelchair user homes per annum in the 2022-32 period in Coventry and 380 in Warwickshire – this equates to 14% of all housing need (as set out in the table below).

Table 14.23 Estimated need for wheelchair user homes, 2022-32 (figure per annum)

	Current need	Projected need (2022-32)	Total current and future need	Trend-based housing need (2022-32)	% of Housing Need
Coventry	123	55	178	1,409	12.6%
North Warwickshire	30	16	46	127	36.2%
Nuneaton & Bedworth	58	35	93	380	24.5%
Rugby	36	32	68	681	10.0%
Stratford-on-Avon	47	50	97	671	14.5%
Warwick	44	31	75	644	11.7%
Warwickshire	215	165	380	2,504	15.2%
Coventry-Warwickshire	337	221	558	3,913	14.3%

Source: Derived from a range of sources

- 14.64 Furthermore, information in the EHS (for 2017/18) also provides national data about wheelchair users by tenure. This showed that, at that time, around 7.1% of social tenants were wheelchair users, compared with 2.7% of market households (owner-occupiers and private renters). Applying these national figures to the demographic change and need (as shown above) it is possible to estimate the potential need by tenure, as shown in the table below. This shows a need for around 12% of market homes to be M4(3) along with 31% of affordable.

Table 14.24 Estimated need for wheelchair user homes by tenure, 2022-32

	Market	Affordable
Coventry	10%	26%
North Warwickshire	28%	74%
Nuneaton & Bedworth	19%	50%
Rugby	8%	21%
Stratford-on-Avon	11%	30%
Warwick	9%	24%
Warwickshire	12%	31%
Coventry-Warwickshire	12%	31%

Source: Derived from demographic projections and EHS prevalence rates

- 14.65 To meet the identified need, the Councils could seek a proportion (around 10-15%) of all new market homes to be M4(3) compliant and potentially around a third in the affordable sector. These figures reflect that not all sites would be able to deliver homes of this type. In the market sector these homes would be M4(3)A (adaptable) and M4(3)B (accessible) for affordable housing.
- 14.66 As with M4(2) homes it may not be possible for some schemes to be built to these higher standards due to built-form, topography, flooding etc. Furthermore, provision of this type of property may in some cases challenge the viability of delivery given the reasonably high build out costs (see table below).
- 14.67 It is worth noting that the Government has recently published findings from a consultation on changes to the way the needs of people with disabilities and wheelchair users are planned for. This is as a result of concerns that in the drive to achieve housing numbers, the delivery of housing that suits the needs of the households (in particular those with disabilities) is being compromised on viability grounds⁵³.
- 14.68 A key outcome of this consultation is the proposal to change building regulations so that M4(1) is removed altogether, so that all new homes will have to at least have the accessible and adaptable features of an M4(2) home. M4(3) would apply where there is a local planning policy in place in which a need has been identified and evidenced. This is consistent with the evidence presented in this report, although the trade-off identified in the consultation paper between viability and the need to deliver sufficient numbers of market homes to meet general housing needs is unavoidable.
- 14.69 The viability challenge is particularly relevant for M4(3)(B) standards. These make properties accessible from the moment they are built and involve high additional costs that could in some cases challenge the feasibility of delivering all or any of a policy target.

⁵³ Raising accessibility standards for new homes, a consultation paper, page 10

Table 14.25 Access Cost Summary

	1-Bed Apartment	2-Bed Apartment	2-Bed Terrace	3-Bed Semi Detached	4-Bed Semi- Detached
M4(2)	£940	£907	£523	£521	£520
M4(3)(A) – Adaptable	£7,607	£7,891	£9,754	£10,307	£10,568
M4(3)(B) – Accessible	£7,764	£8,048	£22,238	£22,791	£23,052

Source: EC Harris, 2014

- 14.70 However, local authorities only have the right to request M4(3)(B) accessible compliance from homes for which they have nomination rights. They can, however, request M4(3)(A) adaptable compliance from the wider (market) housing stock.
- 14.71 A further option for the Councils would be to consider seeking a higher contribution, where it is viable to do so, from those homes to which they have nomination rights. This would address any under delivery from other schemes (including schemes due to their size e.g. less than 10 units or 1,000 square metres) but also recognise the fact that there is a higher prevalence for wheelchair use within social rent tenures. This should be considered when setting policy.

Summary

- 14.72 A range of data sources and statistics have been accessed to consider the characteristics and housing needs of the older person population and the population with some form of disability. The two groups are taken together as there is a clear link between age and disability. The analysis responds to Planning Practice Guidance on *Housing for Older and Disabled People* published by Government in June 2019 and includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards).
- 14.73 The data shows in general that Warwickshire has a slightly older age structure and similar levels of disability compared with the national average whilst Coventry has a younger age structure (and higher age-specific rates of disability in a regional/national context). The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Key findings for the 2022-32 period include:
- A 18% increase in the population aged 65+ (potentially accounting for 54% of total population growth;
 - A 21% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems;

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- A need for around 1,960 housing units with support (sheltered/retirement housing) in Coventry and 1,840 units in Warwickshire – mainly affordable housing in Coventry and market homes in Warwickshire;
 - A need for around 230 additional housing units with care (e.g. extra-care) in Coventry and over 2,000 in Warwickshire – focussed on market housing in both areas;
 - A need for additional nursing care bedspaces and some residential care in Warwickshire; and
 - a need for around 180 (Coventry) and 400 (Warwickshire) dwellings per annum to be for wheelchair users (meeting technical standard M4(3)).

14.74 This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing. Given the evidence, the Councils could consider (as a start point) requiring all dwellings (in all tenures) to meet the M4(2) standards (which are similar to the Lifetime Homes Standards) and 10%+ of homes meeting M4(3) – wheelchair user dwellings (a higher proportion in the affordable sector).

14.75 Where the authority has nomination rights M4(3) would be wheelchair accessible dwellings (constructed for immediate occupation) and in the market sector they should be wheelchair user adaptable dwellings (constructed to be adjustable for occupation by a wheelchair user). It should however be noted that there will be cases where this may not be possible (e.g. due to viability or site-specific circumstances) and so any policy should be applied flexibly.

14.76 The Councils should also consider if a different approach is prudent for market housing and affordable homes, recognising that Registered Providers may already build to higher standards, and that households in the affordable sector are more likely to have some form of disability.

14.77 In seeking M4(2) compliant homes, the Council should also be mindful that such homes could be considered as 'homes for life' and would be suitable for any occupant, regardless of whether or not they have a disability at the time of initial occupation.

14.78 In framing policies for the provision of specialist older persons accommodation, the Councils will need to consider a range of issues. This will include the different use classes of accommodation (i.e. C2 vs. C3) and requirements for affordable housing contributions (linked to this the viability of provision). There may also be some practical issues to consider, such as the ability of any individual development being mixed tenure given the way care and support services are paid for.

15. CONCLUSIONS

- 15.1 This section sets out a summary of the analysis and conclusions for the authorities to take forward in the development of local plans across the sub-region.

Local Housing Need

- 15.2 The starting point for assessing housing need is the standard method set out in Planning Practice Guidance. This identifies a need for 5,554 dwellings annually across Coventry and Warwickshire, with a particular concentration of need in Coventry influenced by the two-stage affordability uplift which is applied to a high demographic projection.
- 15.3 However previous evidence has identified, and is has now been recognised by the Statistics Regulator and accepted by the Office for National Statistics (ONS), that there have been issues with estimating and projecting the population in Coventry. Initial Census data released in June 2022 supports this. The HEDNA has therefore modelled new demographic projections which take account of the initial Census data releases, and seek to assess how the population can be expected to change over time. The HEDNA then applies these alternative projections through the framework provided by the standard method.
- 15.4 The results of the housing needs modelling undertaken are shown below. The new trend-based projections point to a need for 4,906 dwellings annually across the sub-region. This is lower than the Standard Method (using 2014-based Household Projections) due to the clear issues with population data feeding into projections for Coventry.

Table 15.1 Overall Housing Need

	Coventry	North Warks	Nuneaton & Bedworth	Rugby	Stratford-on-Avon	Warwick	HMA
2014-based	3,188	176	435	516	564	675	5,554
Trend-based	1,964	119	409	735	868	811	4,906

- 15.5 Given across the HMA that population figures have been over-estimated for many years, it is reasonable and expected that any alternative trend-based projection would show a lower need. It is however recommended that the Councils monitor new data releases from ONS (including MYE and projections) as ONS will need to grapple with the issue of inaccuracies in the MYE in any future releases.
- 15.6 Econometric forecasts do not point to as strong growth moving forwards as we have seen in recent

years (with the economic forecasts showing additional job creation of c. 3,300 which falls below labour supply growth in the trend-based projections). Demographic growth (in the revised projections) therefore supports sufficient growth in labour supply across Coventry and Warwickshire as a whole; and there is therefore no case for adjusting upwards overall housing need.

- 15.7 However for North Warwickshire, there is a case for higher housing provision than the standard method baseline to manage cross-boundary commuting. This can be achieved through questions of the distribution of housing provision; and North Warwickshire's existing Plan makes provision for meeting unmet needs from other areas (Coventry and Birmingham) which contribute to labour force growth and thus achieve this.

Employment Land Requirements

- 15.8 Coventry and Warwickshire is a £26 billion economy, accounting for 19% of West Midlands GVA. Growth in GVA has slightly out-performed regional and national trends. Total employment in 2019 across Coventry and Warwickshire is estimated at 526,900 jobs. The economic participation rate in the sub-region (79.3%) is marginally above the national rate (78.8%) but considerably stronger than the region (77.5%).
- 15.9 Manufacturing is the largest sector in employment terms, accommodating 58,000 jobs. The next largest sectors are education and professional services. The analysis points to some higher value manufacturing activities, such as machinery, in which there is a reasonable representation. Brexit is creating uncertainties; as well as warehousing/logistics, where demand is currently strong influenced by growth in e-retailing; and education.
- 15.10 The office market has been weakened Covid-driven shift towards homeworking and associated uptake of virtual communication technologies is likely to have some impact on future requirements with a range of companies likely to support at least part-time working from home. Whilst this may be in part offset by changing use of office space and associated layouts, it is likely to have some downward impact on future office floorspace needs. It can also be expected to drive a flight towards good quality space.
- 15.11 The sub-region, and in particular the northern and central parts of it, clearly has a strong and dynamic and industrial market. The evidence points to a very significant stock of industrial floorspace at almost 8 million sq. m of space and sustained high take-up over the period since 2013. Whilst there are some challenges for the automotive sector, which can be relatively cyclical and has influenced strong take-up in recent years, demand for logistics/distribution space looks likely to remain strong buoyed by the growth in e-retailing in particular. Rents and land values are reaching record levels.

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- 15.12 Available industrial space remains low and the strength of demand has support strong recent development activity together with growth in rents, with a very substantial 1.3 million sq. m of space delivered since 2013 with over 1 million sq. m over the 2015-20 period. New supply does appear to be coming forwards, not least as sites allocated in the last round of local plans start to progress, but there will likely be a continuing need to replenish industrial supply over time if economic growth is not to be constrained.
- 15.13 The HEDNA has considered employment land requirements across Coventry and Warwickshire looking to 2041 and 2050. In doing so, it has modelled employment land needs utilising a range of different forecasting techniques alongside local intelligence and an understanding of the merits of different approaches in drawing conclusions. This approach of triangulating different approaches and testing findings, which IcenI adopts, is consistent with the PPG.
- 15.14 In the context of the need for office space, the HEDNA concludes that given that office requirements tend to be closely linked to employment levels, it is recommended that in the round the labour demand models best represent future needs for office floorspace. The labour demand should best represent the future economic outlook, it is recommended that this be used for planning policy requirements.
- 15.15 In respect of industrial and warehousing, the HEDNA concludes that neither the VOA or labour demand models are able to differentiate the strategic and more local industrial / warehouse requirements. As a result, the completions data is likely to be the best representation of market needs for the next phase of plan making for industrial / warehousing floorspace particularly for the short/medium-term. Comparing the completions data with other sources, monitoring by authorities suggests far higher levels of development have been achieved and therefore may be required in the future.
- 15.16 In respect of strategic warehousing floorspace (units over 9,000 sq.m), the HEDNA concludes that it would be appropriate to plan for future development to be in line with recent completions trends over the initial 10 year period (2021-31), with the subsequent decade then seeing potentially slower growth in line with the traffic growth and replacement demand modelling. On this basis, the HEDNA concludes on a need for 606 ha of land to 2041, and 709 ha to 2050.
- 15.17 IcenI's consultation exercise suggests that whilst B8 demand is very strong, there is a need for separate allocations for B1c/B2 where land is delineated from sites going for B8 in order to support the manufacturing sector. There is a strong manufacturing sector in the sub-region which needs to be provided for.
- 15.18 Drawing the above together and factoring in an adjustment for a margin to incorporate flexibility, the HEDNA concludes on the employment land needs set out in the tables below.

Table 15.2 Employment Land Needs 2021-2041, ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	5.3	56.1	61.4	
N. and Bedworth	2.2	45.5	47.7	
Rugby	5.2	150.5	155.7	
Stratford-on-Avon	5.2	166.1	171.3	
Warwick	11.4	56.2	67.6	
Coventry	8.5	147.6	156.1	
Total	37.8	755.0	792.8	606

Source: VOA / CE/lceni

Table 15.3 Employment Land Needs 2021-2050, ha

	Office	General Industrial	Sub-Total	Strategic B8
N. Warwickshire	7.0	81.4	88.4	
N. and Bedworth	3.0	66.0	69.0	
Rugby	6.5	218.2	224.7	
Stratford-on-Avon	7.2	240.9	248.1	
Warwick	15.8	81.4	97.2	
Coventry	10.0	214.0	224.0	
Total	60.3	373.3	433.6	709

Source: VOA / CE/lceni

Affordable Housing

- 15.19 The HEDNA models the need for affordable housing using the approach set out by Government in Planning Practice Guidance (PPG). It identifies a net need for 3,833 social or affordable rented homes per annum across the sub-region from households who cannot afford to meet their needs within the open market.
- 15.20 The evidence indicates that around 20-30% of the rented need identified should theoretically be met through provision of affordable rented homes; but there are wider considerations to be taken into account in determining policies for new-build development, including individual council's priorities, what rents are charged for existing stock and viability considerations.

Table 15.4 Annual Need for Social / Affordable Rented Housing

	Current need	Newly forming households	Existing households falling into need	Total Gross Need	Relet Supply	Net Need
Coventry	495	1,667	653	2,816	929	1,887
North Warwickshire	40	163	52	256	124	131
Nuneaton & Bedworth	102	431	188	720	313	407
Rugby	77	398	166	640	233	407
Stratford-on-Avon	81	397	238	716	297	419
Warwick	132	571	204	907	325	582
Warwickshire	431	1,959	848	3,238	1,292	1,946
C & W	926	3,627	1,501	6,054	2,221	3,833

15.21 In addition the core analysis within the report indicates that there is a need for around 609 affordable home ownership homes per annum. The figures for individual authorities are set out in the table below. The greatest need shown is in South Warwickshire, with the evidence pointing to a lack of or very modest need for affordable home ownership products in North Warwickshire and Nuneaton and Bedworth. This assumes some contribution to supply from sales of market homes below lower quartile prices.

Table 15.5 Estimated Need for Affordable Home Ownership by sub-area (per annum)

	Total Gross Need	Supply	Net need
Coventry	633	484	149
North Warwickshire	120	118	2
Nuneaton & Bedworth	214	230	-16
Rugby	296	208	88
Stratford-on-Avon	410	281	129
Warwick	553	296	258
Warwickshire	1,593	1,133	460
Coventry-Warwickshire	2,226	1,617	609

15.22 The affordable housing need is high relative to the overall housing need. However the two are not directly comparable, as the assessment of overall housing need looks at the overall need for additional homes; whereas the affordable housing need in part reflects an existing tenure imbalance. Future affordable housing delivery will be influenced by issues related to viability and the availability of funding. Policies for affordable housing provision within local plans should therefore be influenced by a combination of the needs evidence, viability evidence which examines what affordable housing can be viable delivered through mixed tenure schemes, together with Council priorities. The affordable need, in particular for social/ affordable rented homes, is a consideration in setting overall

housing targets, but it should be recognised that viability and the availability of funding are realistically constraints on the level of provision which can be achieved.

- 15.23 The evidence indicates that around 20-30% of the rented need identified should theoretically be met through provision of social rented homes; but there are wider considerations to be taken into account in determining policies for new-build development, including individual council's priorities, what rents are charged for existing stock and viability considerations.
- 15.24 Both First Homes and Shared Ownership will have a role to play in helping households with marginal affordability. The HEDNA indicates that First Homes should be priced at least the minimum discount of 30% of the Open Market Value (OMV). Shared ownership properties will also have a role in meeting needs and are suitable in particular for households with more marginal affordability and lower savings.
- 15.25 Targets for affordable housing provision within local plans should be influenced by a combination of the needs evidence, viability evidence which examines what affordable housing can be viable delivered through mixed tenure schemes, together with Council priorities.

Sizes & Types of Homes Needed

- 15.26 The HEDNA models the implications of demographic dynamics on the need for different sizes of property by tenure, taking account of how households occupy homes with adjustments to address overcrowding and provide opportunities for rightsizing.
- 15.27 The analysis indicates that the need for social or affordable rented properties should be focused on smaller properties, as in this sector households size is more closely aligned to the sizes of homes. 70% of the need identified is for 1- and 2-bed properties; and 30% for properties with three or more bedrooms. The profile by individual local authority is shown below.

Table 15.6 Suggested Mix of Social/Affordable Rented Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	30%	35%	25%	10%
North Warwickshire	30%	35%	25%	10%
Nuneaton & Bedworth	25%	35%	30%	10%
Rugby	35%	30%	20%	15%
Stratford-on-Avon	40%	35%	20%	5%
Warwick	40%	35%	20%	5%
Warwickshire	35%	35%	20%	10%
Coventry-Warwickshire	35%	35%	20%	10%

- 15.28 Affordable home ownership homes should be focused on delivery of 2- and 3-bedroom properties, with the evidence pointing to a greater need for 2-bed homes than other property sizes.

Table 15.7 Suggested Mix of Affordable Home Ownership Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	20%	45%	25%	10%
North Warwickshire	20%	40%	30%	10%
Nuneaton & Bedworth	20%	40%	30%	10%
Rugby	20%	40%	30%	10%
Stratford-on-Avon	20%	45%	25%	10%
Warwick	20%	45%	25%	10%
Warwickshire	20%	40%	30%	10%
Coventry-Warwickshire	20%	45%	25%	10%

- 15.29 The mix of market homes needed is focused towards 2- and 3-bed properties, as shown below. This takes account of the ageing of the population and role which suitable housing provision can have in enabling rightsizing. Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2- and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retaining flexibility for friends and family to come and stay.

Table 15.8 Suggested Mix of Market Housing by area

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Coventry	10%	40%	40%	10%
North Warwickshire	10%	35%	45%	10%
Nuneaton & Bedworth	10%	35%	45%	10%
Rugby	10%	30%	45%	15%
Stratford-on-Avon	10%	35%	40%	15%
Warwick	10%	40%	40%	10%
Warwickshire	10%	35%	45%	10%
Coventry-Warwickshire	10%	40%	40%	10%

- 15.30 These figures are intended to be used as a monitoring tool rather than to be applied rigidly to all individual development sites. In applying the evidence, consideration should be given to the existing house mix in the locality and gaps within this; site location and characteristics; and local needs or market evidence (including from Council's housing registers). Additionally, the Councils should consider the role of bungalows within the mix – such housing can be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into the market. Provision of specialist housing can assist in releasing existing family homes and supporting turnover in the wider housing market.

Housing a growing Older Population

- 15.31 The provision of a choice of attractive housing options to older households is a component of achieving good housing mix. The availability of such housing options for the growing older population may enable some older households to downsize from homes which no longer meet their housing needs or are expensive to run. The availability of housing options which are accessible to older people will also provide the opportunity for older households to 'rightsize' which can help improve their quality of life.
- 15.32 The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Key findings for the 2022-32 period include:
- A 18% increase in the population aged 65+ (potentially accounting for 54% of total population growth);
 - A 21% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems;
 - A need for around 1,960 housing units with support (sheltered/retirement housing) in Coventry and 1,840 units in Warwickshire – mainly affordable housing in Coventry and market homes in Warwickshire;
 - A need for around 230 additional housing units with care (e.g. extra-care) in Coventry and over 2,000 in Warwickshire – focussed on market housing in both areas;
 - A need for additional nursing care bedspaces and some residential care in Warwickshire; and
 - a need for around 180 (Coventry) and 400 (Warwickshire) dwellings per annum to be for wheelchair users (meeting technical standard M4(3)).
- 15.33 On the basis of the evidence, the Council should consider requiring all dwellings (in all tenures) to meet the M4(2) standards (which are similar to the Lifetime Homes Standards) and 10%+ of homes meeting M4(3) – wheelchair user dwellings (a higher proportion in the affordable sector). The Councils should also consider if a different approach is prudent for market housing and affordable homes, recognising that Registered Providers may already build to higher standards, and that households in the affordable sector are more likely to have some form of disability.

15.34 The analysis suggests that there will be a notable need for both housing with support and housing with care (in both market and affordable sectors), as well as some additional nursing and residential care bedspaces. In Coventry the need is particularly for affordable housing (housing with support), with the opposite being the case in Warwickshire.

Table 15.9 Specialist Housing Need 2022-32 – Coventry

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	40	462	970	508	104	612
	Affordable	93	1,168	2,274	1,106	245	1,350
Total (housing with support)		133	1,630	3,244	1,614	349	1,963
Housing with care	Market	21	210	514	304	55	360
	Affordable	27	855	653	-202	70	-131
Total (housing with care)		48	1,065	1,168	103	126	228
Residential care bedspaces		42	1,203	1,038	-165	112	-53
Nursing care bedspaces		48	567	1,168	601	126	726
Total bedspaces		90	1,770	2,206	436	238	673

Source: Derived from Demographic Projections and Housing LIN/EAC

Table 15.10 Specialist Housing Need 2022-32 – Warwickshire

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2032	Shortfall/surplus by 2032
Housing with support	Market	58	1,913	3,560	1,647	843	2,490
	Affordable	60	5,198	3,695	-1,503	848	-655
Total (housing with support)		118	7,111	7,255	144	1,691	1,836
Housing with care	Market	27	721	1,665	944	392	1,336
	Affordable	15	477	947	470	217	687
Total (housing with care)		43	1,198	2,612	1,414	609	2,023
Residential care bedspaces		38	2,253	2,322	69	541	610
Nursing care bedspaces		43	2,261	2,612	351	609	960
Total bedspaces		80	4,514	4,934	420	1,150	1,570

Source: Derived from Demographic Projections and Housing LIN/EAC

Self and Custom Housebuilding

15.35 Self-build and custom housebuilding is a growing sector of the housing market, and one which has potential to contribute to housing delivery. All of the local authorities in the study area introduced a Self-Build and Custom Housebuilding Register on 1st April 2016 in line with the requirements of legislation.

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- 15.36 If assessed over the five base periods to date, there has been an average of 155 registered expressions of interest in a serviced plot of land and a total of 774 entries. Despite the introduction of a local connection test and fee, Warwick remains the most popular local authority for this type of development.
- 15.37 Each of the local authorities have a local plan policy (or draft policy) supporting Self and Custom Build development. In addition to a specific policy, Rugby, Stratford-on-Avon and Warwick have also produced an SPG. Iceni consider that in order to respond to demand in the sector, and in response to the PPG's requirements, the Councils - particularly those in South Warwickshire where demand is greatest - should continue to express active support self and custom build homes, but should also consider seeking a percentage of self and custom build on larger sites with an appropriate fallback mechanism should plots fail to sell; consider opportunities to identify specific sites for serviced plots (i.e. on public sector land, where available) and encourage developers as part of the overall housing mix to incorporate serviced plots where there is evidence of strong demand.

Private Rented Sector and Build to Rent

- 15.38 The private rented sector has been the key growth sector in the housing market for the last 15 years and now makes up just over 20% of all UK households. Across the study area, the growth in the private rented sector was strong over the last two census points outperforming the national trend between 2001-11. There are different components to the sector, including a student market in Coventry and Warwick District. Across the board, the private rented sector supported around 37% of all Universal Credit claimants with a high of 41% in Coventry City and a low of 25% in Warwick District.
- 15.39 Over recent years, successive Governments have looked to the private rented sector to play a greater role in providing more new build housing and have sought to encourage "Build to Rent" development. BTR development has been delivered in Coventry and Stratford-upon-Avon, with development also now coming forward in Rugby. The HEDNA identifies the potential for BTR development in these authorities and in Warwick; both within town centre locations and potential through suburban build-to-rent development over time. The HEDNA also provides guidance on how the potential for Co-living can be considered and monitored.
- 15.40 In line with national policy, affordable housing in Build-to-Rent development should be provided as affordable private rented housing, with the PPG setting out that 20% should be sought at a 20% discount to market rents, subject to viability.

Student Housing Needs

- 15.41 The area has two universities: Coventry University and Warwick University. Student numbers have grown at both Universities since 2001, however, Coventry has seen more substantial growth and is

defined as the fastest growing University in the UK. Coventry City and Warwick District have very different dynamics, with the majority of households residing in all student households – which principally comprise HMOs - and student halls. In all other authority areas, the majority of students live at home with parents.


- 15.42 Iceni has engaged with both Universities to understand growth ambitions and the latest position with student accommodation provision. Coventry University have indicated that student numbers are expected to remain static for the next 2-3 years. However the University has plans to continue to grow the international student population moving forward which could have an impact on housing needs in the medium to long-term. This should be closely monitored.
- 15.43 At Warwick University, there are around 29,550 students studying on-campus of which c. 7,500 students are housed on-campus. The University is currently in the midst of developing its Strategy looking ahead to 2030, which Iceni understand intends to increase numbers at a “sustainable moderate growth rate.” The approach to housing all first year UG students will be maintained and there is a desire to also offer some additional accommodation to returning students.
- 15.44 There is a sizeable pipeline of student accommodation provision in Coventry, with around 9,275 bedspaces in the pipeline. If delivered, this provides the potential to reduce the number of students living in the wider housing market. As longer-term growth proposals become more clear, it will be important for the planning authorities to maintain dialogue with the two universities to appropriately manage delivery of student accommodation and ensure it keeps pace with or exceeds student growth.

Appendix 3 - EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published online.
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Minakshee Patel
Corporate Equality & Diversity Advisor
minakshee.patel@rugby.gov.uk
Tel: 01788 533509

Equality Impact Assessment

Service Area	Development Strategy
Policy/Service being assessed	Local Plan – agreement to commence a local plan review.
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	This would be a new document to replace the existing local plan.
EqlA Review team – List of members	Peter Heath - Principal Planning Officer
Date of this assessment	27 th October 2022
Signature of responsible officer (to be signed after the EqlA has been completed)	Signature: 

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Advisor.

If you require help, advice and support to complete the forms, please contact Minakshee Patel, Corporate Equality & Diversity Advisor via email: minakshee.patel@rugby.gov.uk or 01788 533509

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Scoping and Defining</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	The report is the first stage in undertaking a review of the local plan. The report seeks approval to the principle of reviewing the local plan. It contains no new policies or site allocations that would affect people's lives.
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	It primarily fits in with priorities on: <ul style="list-style-type: none"> • Rugby Borough Council is a responsible, effective and efficient organisation. • Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents.
(3) What are the expected outcomes you are hoping to achieve?	This first stage is a necessary legal requirement, in itself it achieves nothing but enables the authority to move on to more important stages that could ultimately provide greater opportunities to residents.
(4) Does or will the policy or decision affect: <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	Not at this early stage. See 1 above.
<u>Stage 2 - Information Gathering</u>	
(1) What does the information tell you about those groups identified?	Nothing at this early stage.

<p>(2) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement? If yes, what were their views and how have their views influenced your decision?</p>	<p>Not yet. Undertaking a review of the Local Plan will require three rounds of public consultation and an examination in public. There will be multiple opportunities for the public to be involved in the development of the new local plan.</p>
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<p>(3) If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>Not yet. See 2 above.</p>
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<p><u>Stage 3 – Analysis of impact</u></p>	
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<p><u>(1)Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination? If yes, identify the groups and how they are affected.</p>	<p>RACE</p>	<p>DISABILITY</p>	<p>GENDER</p>
	<p>MARRIAGE/CIVIL PARTNERSHIP</p>	<p>AGE</p>	<p>GENDER REASSIGNMENT</p>
	<p>RELIGION/BELIEF</p>	<p>PREGNANCY MATERNITY</p>	<p>SEXUAL ORIENTATION</p>

<p><u>(2) Cross cutting themes</u></p> <p>(a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?</p> <p>(b) Are your proposals likely to impact on a carer who looks after older people or people with disabilities? If yes, please explain how?</p>	<p>This first stage is a necessary legal requirement, in itself it achieves nothing but enables the authority to move on to more important stages that could ultimately provide greater opportunities to residents.</p> <p>Not at this initial stage.</p>
<p>(3) If there is an adverse impact, can this be justified?</p>	<p>N/A</p>
<p>(4) What actions are going to be taken to reduce or eliminate negative or adverse impact? (this should form part of your action plan under Stage 4.)</p>	<p>N/A</p>
<p>(5) How does the strategy/service/policy contribute to the promotion of equality? If not what can be done?</p>	<p>Not at this initial stage, see 2a above.</p>
<p>(6) How does the strategy/service/policy promote good relations between groups? If not what can be done?</p>	<p>Not at this initial stage, when new policies and site allocations are developed at a later stage they will represent the opportunity to promote good relations.</p>
<p>(7) Are there any obvious barriers to accessing the service? If yes how can they be overcome?</p>	<p>N/A</p>

Stage 4 – Action Planning, Review & Monitoring

If No Further Action is required then go to – Review & Monitoring

(1) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.

(2) Review and Monitoring
State how and when you will monitor policy and Action Plan

No further action is required.

EqlA Action Plan

Action	Lead Officer	Date for completion	Resource requirements	Comments

This EqlA will be reviewed again when the next stage of the plan is presented to Cabinet (subject to Council approval), probably in early-2023.

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).’

AGENDA MANAGEMENT SHEET

Report Title: Planning Enforcement Local Plan 2022

Name of Committee: Cabinet

Date of Meeting: 5 December 2022

Report Director: Chief Officer Growth and Investment

Portfolio: Growth and Investment

Ward Relevance: All Wards

Prior Consultation: None

Contact Officer: Nathan Lowde – Principal Planning Officer – Development Management

Public or Private: Public

Report Subject to Call-In: No

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C)
 Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E)
 Residents live healthy, independent lives, with the most vulnerable protected. (HC)
 Rugby Borough Council is a responsible, effective and efficient organisation. (O)
[Corporate Strategy 2021-2024](#)
 This report does not specifically relate to any Council priorities but

Summary: The primary purpose of the Planning Enforcement Local Plan is to set out the Council’s approach to planning enforcement for all those who are involved in or affected by breaches of planning control in Rugby borough.

Financial Implications: There are no financial implications

Risk Management Implications:	None as a direct result of this report.
Environmental Implications:	A Climate Change impact assessment is attached at Appendix 3. The Enforcement Plan will ensure that the Council has a robust process for dealing with breaches of planning control which includes those instances that relate to biodiversity, air quality and sustainable construction
Legal Implications:	The drafting of this document has been informed by paragraph 59 of the National Planning Policy Framework, 2021 and Planning Practice Guidance as well as the requirements of the Rugby Borough Council Development Plan which is fundamental in guiding decisions relating to breaches of planning control. In addition, The Town and Country Planning Act (T&CPA) 1990 (as amended) provides the statutory basis for planning enforcement matters.
Equality and Diversity:	There are no implications for equality and diversity. An Equality Impact Assessment has been completed to support this document and is attached at Appendix 2.
Options:	<p>Option One: Approve the Planning Enforcement Local Plan.</p> <p>Option Two: Do not approve the Planning Enforcement Local Plan.</p>
Recommendation:	The Planning Enforcement Local Plan, as at Appendix 1 to the report, be approved.
Reasons for Recommendation:	<p>Having an adopted Planning Enforcement Local Plan is an important step in making the planning service more customer focused and ensuring that the Council sets out its approach to this service provision.</p> <p>The Plan will provide greater clarity and assurances for delivery of the planning enforcement function and help keep faith in the planning system. Without this, there will be a lack of direction for planning enforcement decisions within the borough.</p>

Cabinet - 5 December 2022

Planning Enforcement Local Plan 2022

Public Report of the Chief Officer for Growth and Investment

Recommendation

The Planning Enforcement Local Plan, as at Appendix 1 to the report, be approved.

1. INTRODUCTION

- 1.1 Effective enforcement is important to maintain public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. The National Planning Policy Framework (NPPF) suggests that Local Planning Authorities should consider publishing a Local Enforcement Plan to manage enforcement proactively, in a way that is appropriate to their area.
- 1.2 The Planning Enforcement Local Plan relates to Rugby Borough Council's planning enforcement service and describes the purposes of the service and how it will be delivered. This aligns with the Corporate Strategy objective 4 to ensure that our organisational structure and methods of working are agile, efficient and effective.

2. PURPOSE OF REPORT

- 2.1 The Planning Enforcement Local Plan explains the Council's policy and procedure for dealing with reports of alleged breaches of planning control and handling planning enforcement issues. It identifies local priorities for enforcement action so that the Council's enforcement resources are put to the best use in dealing with breaches of planning control. The Planning Enforcement Local Plan has been designed to meet the current needs of the borough.
- 2.2 The Planning Enforcement Local Plan includes performance indicators to measure the performance of the service; from first action through to closure of the case. The performance figures are to be monitored to ensure the enforcement service is delivered to an agreed quality that is proportionate, consistent, transparent and targeted.

3. BACKGROUND

- 3.1 Planning is a high profile and often contentious service and whilst the planning system affords control over most forms of development, the integrity of that system depends on the proper enforcement of breaches of planning control.

- 3.2 It is 4 years since the Council last updated guidance on enforcement. There have been a number of changes to the planning system during this period e.g. a revised National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) for Enforcement.
- 3.3 The NPPF suggests that Local Planning Authorities should consider publishing a Local Enforcement Plan to manage enforcement proactively, in a way that is appropriate to their area.
- 3.4 The Planning Enforcement Local Plan relates to Rugby Borough Council's planning enforcement service and describes the purposes of the service and how it will be delivered.
- 3.5 Although planning enforcement is discretionary and not a mandatory function of Local Planning Authorities, it is commonly recognised the Council must act reasonably when exercising a discretion ("the Wednesbury Principle") and that the integrity of the Development Management process depends on the Council's commitment to take effective action against unauthorised development.
- 3.6 The Planning Enforcement Local Plan is not a replacement of the exhaustive guidance on planning enforcement, both provided by the Government but also by way of case law established in the Courts. It does however provide a framework within which the planning enforcement function will operate.
- 3.7 The Planning Enforcement Local Plan will therefore ensure that officers, councillors and the general public are aware of the approach to planning enforcement and will provide greater certainty for all parties engaged in the development process.
- 3.8 The targets that have been set out in the plan enable the performance of the service to be measured and monitored. The priorities of the service are also identified in order to manage customer's expectations in respect of the progression of complaints and the degree of importance and harm that will be taken into account.

4. Next Steps

- 4.1 Adopt this Planning Enforcement Local Plan. Having an adopted Planning Enforcement Local Plan is an important step in making the planning service more customer focused and ensuring that the Council sets out its approach to this service provision.
- 4.2 The Planning Enforcement Local Plan will be published on the Council's web site.

5. Conclusion

- 5.1 Effective enforcement is important to maintain public confidence in the planning system. The Planning Enforcement Local Plan sets out the preferred approach for the Council to manage the planning enforcement function and provides a framework for the team to be able to work in a more efficient and effective way.

Name of Meeting: Cabinet
Date of Meeting: 5 December 2022
Subject Matter: Planning Enforcement Local Plan
Originating Department: Growth and Investment

DO ANY BACKGROUND PAPERS APPLY **YES** **NO**

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
A	Planning Enforcement Plan

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A



Planning Enforcement Local Plan 2022

INTRODUCTION

The National Planning Policy Framework (NPPF) 2021 recommends that local planning authorities publish a local enforcement plan to manage planning enforcement proactively and in a way that is appropriate to their area. This document sets out the Council's approach to planning enforcement for all those who are involved in or affected by breaches of planning control in Rugby borough.

Rugby Borough Council's Corporate Strategy 2021-2024 sets out a vision for the future of the borough. The planning process is key to ensuring the delivery of the priority outcomes set within this Strategy. It is vital that we have an effective planning enforcement process to help deliver these objectives.

ENFORCEMENT OBJECTIVES

To achieve great development, planning relies on the energy and imagination of planners, decision-makers, developers, designers, and investors. Each of these contributes to bringing ideas through the system to delivery – but without enforcement, our places, our environment, and our quality of life would all be the poorer. At its heart, the planning system relies on trust and our enforcers provide the backbone of this trust – trust that those who flout our planning laws (and often other laws at the same time) will be brought to account; trust that those who strive for high quality will not be undermined by those who would deliver ill-planned and ill-designed development; and trust that the high quality schemes that achieve planning permission will be delivered with that same quality – that planning will deliver what is promised. Ian Tant, RTPI President 2019, The Planning Enforcement Handbook for England, 2020

The key objectives of the planning enforcement team are:

Pro-active and reactive enforcement

Maintain public confidence in the planning system

Responsive and robust processes

Proportionate and consistent action

WHAT IS A BREACH OF PLANNING CONTROL?

The Town and Country Planning Act 1990 defines a breach of planning control as "the carrying out of development without the required planning permission or failing to comply with any condition or limitation subject to which planning permission has been granted."

A breach of planning control can include the following:

- Building work and/or a material change of use undertaken without planning permission being granted.
- Development not being carried out in accordance with the approved plans of a planning permission.
- Non-compliance with conditions attached to a planning permission: and

Appendix I - Final Planning Enforcement Local Plan 2022

- Non-compliance with a planning obligation contained in a s.106 legal agreement attached to a planning permission.

There are also other legislative codes which fall within the remit of the enforcement function. Breaches of this legislation can include the following:

- Works being carried out to a Listed Building which affect its character without listed building consent being granted.
- Non-compliance with conditions attached to a listed building consent.
- The display of advertisements for which express consent is required but not granted.
- The removal of protected trees and/or trees situated within a Conservation Area for which notification or consent is required but not given; and
- Unauthorised removal of important hedgerows (as defined by the Hedgerow Regulations 1997).

MATTERS THAT ARE NOT BREACHES OF PLANNING CONTROL

Not all development or change of use requires planning permission from the local planning authority.

The following are examples of what is not covered by the planning enforcement service:

- Internal works to a non-listed building.
- Obstruction of a highway or public right of way (PROW)
- Parking of commercial vehicles on the highway or on grass verges.
- Parking caravans on residential driveways or within the curtilage of domestic properties if they are incidental to the enjoyment of the property.
- Running a business from home where the residential use remains the primary use and there is no adverse impact on residential amenity.
- Land ownership including boundary disputes or trespass issues.
- Covenants imposed on property Deeds.
- High hedges.
- Any works that are deemed to be 'permitted development' under the Town and Country Planning (General Permitted Development) Order 1995 as amended and or substituted.
- Advertisements that benefit from deemed or express consent, under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.
- Dangerous structures or other health and safety issues.
- The Town and Country Planning (Use Classes) Order 1987 (as amended) allows for certain changes of use without the need for planning permission.

ENFORCEMENT ACTION IS DISCRETIONARY

It is important to note that just because there may be a breach of planning control, this in itself is not sufficient reason to take enforcement action. The Council must first decide, having given regard to policies contained within the adopted Rugby Borough Local Plan, guidance contained in the National Planning Policy Framework (NPPF), and all other material planning considerations whether it is '**expedient**' to take formal action. Expediency is a test of whether the unauthorised activities are causing material harm to the environment or amenity of the area. Therefore, enforcement action is **discretionary**, and each case must be assessed on its own merits.

Appendix I - Final Planning Enforcement Local Plan 2022

Guidance from Central Government is that formal enforcement action should be a last resort and that Councils are expected to give those responsible for a breach of planning control, the opportunity to put matters right or to seek to regularise the breach, before resorting to serving a formal notice. Any such service of a formal notice must be proportionate and commensurate with the breach of planning control.

This means that the Council may not take formal enforcement action in all cases where there has been a breach of planning control identified.

Guidance from Central Government Councils goes on to state the Council should avoid taking action in the following circumstances: -

- there is a trivial or technical breach of control which causes no material harm or adverse impact on the amenity of the site or the surrounding area.
- development is acceptable on its planning merits and formal enforcement action would solely be to regularise the development.
- in their assessment, the local planning authority consider that an application is the appropriate way forward to regularise the situation, for example, where planning conditions may need to be imposed.
- A judgement will be taken on a case by case basis by the enforcement team who will provide a report setting out why no action should be taken which will be countersigned by either the Development and Enforcement Manager or any other authorised officer as set out in the Constitution.

HOW TO REPORT A BREACH OF PLANNING CONTROL

You can report a breach [online](#) or by emailing RBC.planningenforcement@rugby.gov.uk

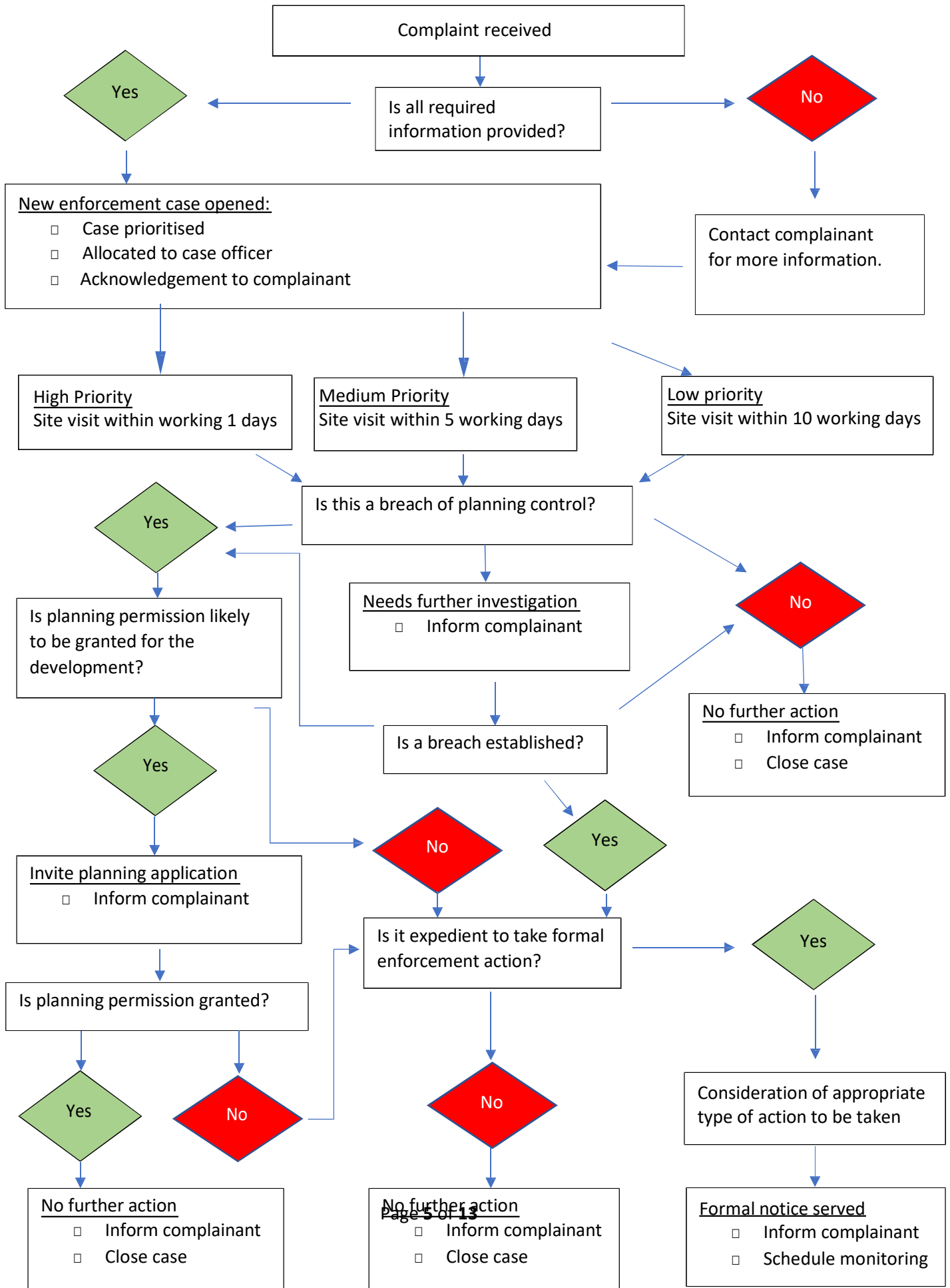
Please provide the following information:

- Your name, address, and contact details. These will remain strictly confidential. We do not investigate anonymous complaints unless it relates to a matter of public safety.
- The address where the breach is taking place.
- What the breach is and when it started.
- Where possible a photo of the works (this helps us prioritise the breach).
- Where possible, the name, address, email/telephone number of who is carrying out the work.

The Council determines whether the alleged breach merits investigation. Complainants who do not wish to give their personal details will be advised to contact either their Local Ward Councillor or their Parish Council who may then raise their concerns on their behalf. Personal details provided by a complainant will be kept confidential and will not be disclosed unless required to do so because of any formal Court proceedings.

WHAT HAPPENS AFTER I REPORT A BREACH OF PLANNING CONTROL?

Planning Enforcement Investigation Flow Chart



HOW WILL WE PRIORITISE YOUR COMPLAINT

To make the best use of resources available it is important to prioritise the complaints received in accordance with the seriousness of the alleged breach. This will initially be decided by the Council following receipt of the complaint however may be subject to change following a site inspection or when further information comes to light.

High Priority – A site visit will take place within 1 working day of receipt Severe, irreversible, and usually on-going/progressive

1. Breaches of Listed Building control caused by on-going work
2. Removal of hedgerows/works to trees which are protected by Tree Preservation Orders/within Conservation Areas
3. Development that causes significant harm or danger to the amenities of neighbouring residents and the public or is contrary to significant policies in the Local Plan.
4. Unauthorised encampments
5. Unauthorised development / advertisements which gives rise to a potential risk to public safety

Medium Priority – A site visit will take place with within 5 working days of receipt On-going work which may cause significant and progressive harm to the area if not addressed swiftly.

1. Large scale building works causing significant loss of amenity.
2. Breach of condition, which results in serious demonstrable harm to the neighbourhood.
3. Unauthorised development, which is the source of significant public complaint (significant public complaint can be quantified as 5 or more independent sources complaining about the same alleged breach of planning control).
4. The erection of unauthorised advertisements causing serious harm to amenity or public safety and/or a detrimental impact on highway safety.
5. Unsightly buildings or untidy land that are causing serious harm to the amenity of neighbouring residents and/or significant harm to the appearance of the area in which it is located.

Low Priority – A site visit will take place within 10 working days of receipt, if necessary, following a desktop appraisal of the issues.

No significant harm or impact limited to adjacent properties and reversible.

1. Other advertisements (no known or potential harm to public safety)
2. Domestic extensions and outbuildings.
3. Most breaches of planning conditions likely to be resolved without formal action.
4. Untidy land, except where it causes serious harm to the amenity of neighbouring residents.

HOW ARE BREACHES RESOLVED

There is a range of tools available to the planning enforcement team to tackle breaches of planning control. The use of these can vary depending on the nature of the breach and the level of harm caused. The most common measures are set out below.

INFORMAL ACTION

No breach established – Following a site inspection it may be found that there is no breach of planning control because for example the unauthorised use has ceased, or the development is permitted development.

There is a breach of planning control but not considered expedient to pursue – Just because a breach may exist does not automatically mean that formal action will be taken. Enforcement powers are discretionary and minor technical breaches may not be considered expedient to pursue as they may be judged to be de minimis, for example too minor to justify the likely amount of time and expense involved in pursuing them.

The development is lawful and immune from enforcement action - This is when the unauthorised development or unauthorised change of use has occurred over a long period of time without being brought to the attention of the Council. There are certain time limits involved in relation to operational development and changes of use, however for further details please contact the Enforcement Team who will be happy to advise you if you think this may apply to you (rbc.planningenforcement@rugby.gov.uk).

Negotiations take place to find a solution – In accordance with Government guidance the priority is to try and resolve any breaches of planning control through negotiation. Only when such negotiations fail to secure a solution should formal action be considered. The Council will not however allow negotiations to become protracted where there is a need to make the development acceptable or where there is a requirement for a particular use to cease.

Retrospective planning applications - In accordance with Government advice the Council will firstly seek to negotiate an amicable solution to any confirmed breach of planning control. By entering negotiations with the parties involved, a solution may be found which could involve the cessation of any unauthorised change of use or building operations, the removal of any unauthorised building works or items constituting a material change of use of land, and/or the remedy of any breach by the submission of a retrospective planning application.

A retrospective application will be invited where it is considered that there is a reasonable likelihood that planning permission may be granted in line with local and national planning policies or where a development may be able to be made acceptable by way of the imposition of conditions. Whilst a planning application is being considered no further enforcement action will be taken.

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Minor or technical breaches of planning control may not be pursued if a retrospective application has been requested but no application has been forthcoming and it is not considered expedient to do so.

If an enforcement notice has already been served, then the Council may decline to determine any retrospective planning application which seeks to regularise any or all the breaches of planning control that are referred to in the enforcement notice.

FORMAL ACTION

Planning contravention notices - A PCN is a legal notice which allows the Council to bring the breach to the attention of the owner or occupier and requires the alleged offender to provide certain information. It also invites the offender to respond constructively to the Council about how any suspected breach of planning control may be satisfactorily remedied. The offender has 21 days to respond. It is a criminal offence to fail to respond or provide misleading information to a PCN.

Enforcement notices – These are formal legal documents that require the owner or occupier to follow specific steps to correct the planning breach in a set time. If the notice is not complied with, the planning breach will become a criminal offence which can be prosecuted in the courts. The Council may decide not to require action to be taken to remedy the whole of a breach of planning control. This is known as “under enforcement”. A copy of the notice will be entered on the local land charges register and the local planning authority’s register of enforcement notices, available online. There is a right of appeal against an Enforcement Notice, which must be exercised prior to the Notice coming into effect. There is no right of appeal outside of this time.

Breach of condition notices - can be used where the unauthorised activity is in breach of a condition attached to a planning permission. A BCN will require compliance with the conditions within a specified period. A breach of the notice will have taken place if the condition(s) has not been complied with, the specified steps have not been undertaken within the timescales identified in the BCN, or activities have not ceased. There is no right of appeal against these notices.

Stop notices - can prohibit any or all the activities comprising the alleged breach(es) of planning control specified in the related enforcement notice. A stop notice cannot be served without an accompanying enforcement notice. A stop notice’s requirements must only prohibit what is essential to safeguard amenity or public safety in the neighbourhood, or to prevent serious or irreversible harm to the environment in the surrounding area. A stop notice may not prohibit the use of any building as a dwelling house. If the associated enforcement notice is quashed, varied, or withdrawn or if the stop notice is withdrawn compensation may be payable. A full assessment of the likely consequences of serving the notice will be made as such action may expose the Council to additional financial burden or legal challenge.

Temporary stop notices – require an activity which is in breach to cease immediately. The notice does not have to wait for an accompanying enforcement notice to be issued. It cannot be used to get someone to do something such as remove an extension or stop the use of a building as a dwelling house. A temporary stop notice expires 28 days after the display of the notice on site (or any shorter

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period specified). At the end of the 28 days there is the risk of the activity resuming if an enforcement notice is not issued and a stop notice served. The effect of issuing a temporary stop notice will be to halt the breach of planning control, or the specified activity immediately. This can have immediate serious consequences on a business particularly in terms of costs, so the Council should ensure that a temporary stop notice's requirements prohibit only what is essential to safeguard amenity or public safety in the neighbourhood; or to prevent serious or irreversible harm to the environment in the surrounding area.

Injunctions – An application can be made to the High Court or County Court for an injunction to restrict or prevent a breach of planning control. Proceedings for an injunction are the most serious enforcement action that can be taken because if a person fails to comply with an injunction they can be committed to prison for contempt of court. The first stage is to formally warn the offender of an injunction and require them to sign a legal undertaking which confirms that the alleged breach will cease. If this undertaking is breached, then an application is made for an injunction.

Section 215 notices – can be used to take steps requiring land or buildings to be cleaned up when its condition adversely affects the amenity of the area. If it appears that the amenity of part of an area is being adversely affected by the condition of neighbouring land and buildings, a notice can be served on the owner requiring that the situation be remedied. There is no right of appeal, although before the notice takes effect an appeal can be made to a Magistrates Court by those served with the notice or any other person having an interest in the land.

Community Protection Warnings/Notices- can be used to deal with unreasonable behaviour, ongoing problems or nuisances (such as an untidy building which is having an adverse impact upon the amenity of the area) which negatively affect the community's quality of life by targeting the person responsible. The warning/notice can direct any individual, business or organisation responsible to stop causing the problem and to take reasonable steps to ensure it does not happen again.

Discontinuance notice – requires the display of a particular advertisement with deemed consent (or the use of a particular site for displaying advertisements with deemed consent) to cease. This action can only be taken where it is necessary to remedy a substantial injury to the amenity of the locality or a danger to members of the public. "Substantial injury" to the amenity of the locality is a more rigorous test than the "interests" of amenity that applications for deemed consent are assessed against.

In addition to the above, further action is available by way of the taking of direct action to remedy a breach or to instigate prosecution proceedings for non-compliance where it is deemed necessary to do so.

If the Council considers that a complaint, either at the start or after an initial investigation, is vexatious or malicious with no real planning grounds to substantiate it will either refuse to investigate or close the file with no further action.

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Please note, planning enforcement is a protracted and complex legal process and in some instances can take long periods of time to resolve, which is heavily influenced by the co-operation of any alleged offender. Please see Appendix 1 for the Council Service Standards relating to Planning Enforcement.

WHAT CAN I EXPECT IF I CARRY OUT WORK WITHOUT PERMISSION?

If a complaint is received that affects you then the first thing that will happen is either you will be contacted (where your details are known to the Council) or the site in question will be visited by an enforcement officer. The purpose of this visit is to establish the facts of the case and whether there is any basis to the allegations made. The officer will, where necessary, take measurements and photographs of the development or activity taking place. This site inspection may be undertaken without any prior notification.

If there is a breach of planning control, you will be advised of the details of the breach and what steps need to be taken to either rectify the breach or regularise the situation. If no breach is identified, then no action will be taken against you.

You will be given a reasonable period (subject to the nature of the breach) to resolve any breach of planning control. If compliance is not secured through amicable negotiations or the submission of a retrospective planning application formal action may be instigated.

POWER OF ENTRY ONTO LAND

Section 196(a) of the Town and Country Planning Act (as amended), the Planning (Listed Buildings and Conservation Area) Act 1990 and Part 8 of the Anti-Social Behaviour Order Act 2003 gives officers of the Council the power to enter land and/or premises at all reasonable hours to undertake their official duties. Wilful obstruction of a person exercising a right of entry is an offence.

The above does not allow the admission to any building used as a dwelling house to be demanded as a right by virtue of the legislations unless twenty-four hours prior notice of the intended entry has been given to the occupier of the building.

All planning enforcement officers are required to carry approved identification which can be produced for inspection upon request. Access may be requested to nearby properties where this is necessary to fully investigate an alleged breach.

REGISTER OF ENFORCEMENT NOTICES.

Every planning authority must keep an Enforcement Register (Section 188 register). Details of all enforcement notices, stop notices, enforcement orders and breach of condition notices issued in respect of land in their area must be entered in the register. A copy of the register can also be visited on the Council's website www.rugby.gov.uk.

DELEGATION OF POWERS

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The ability for officers to take enforcement action is set out within the Council's constitution which is reviewed regularly and can be viewed on the Council's website www.rugby.gov.uk.

EQUALITY

As required as part of the Equality Act 2010 Section 149, in the drafting of this plan due regard has been taken of the need to eliminate unlawful discrimination, harassment and victimisation and to advance equality of opportunity between different groups and foster good relations between different groups. It is not considered that this plan would conflict with the requirements of the Equality Act 2010 or the Council's policy on equality.

COMPLAINTS

If an individual is unhappy with the way in which an enforcement case has been handled all complaints must follow the Council's Corporate Complaints process which can be found at: <https://www.rugby.gov.uk/complaints>

APPENDIX 1: SERVICE STANDARDS

SERVICE STANDARDS	STANDARD TARGET
Acknowledge allegation within 3 working days of its receipt	100%
When a site visit is necessary, to conduct the visit within prescribed priority timescale	80%
Close file within 10 working days of the site visit or desktop investigation where there is no breach of planning control	80%
Close file within 8 weeks where there is a breach of planning control but it is not expedient to take action	80%
Determine action within 8 weeks where there is a breach of planning control and it is expedient to take action	80%
Serve Enforcement Notice within 28 days of instruction	90%
During the enforcement notice compliance period at least one written contact is made, warning of need to comply where appropriate	100%
To check compliance, review file, determine next action and review date within 10 working days of compliance date stated on Enforcement Notice	90%
Where prosecution or injunction agreed, evidence to be provided to legal within 10 working days of agreement date for action	90%
After prosecution to review file and determine action within 10 days	90%

APPENDIX II - EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published online.
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Minakshee Patel
Corporate Equality & Diversity Advisor
minakshee.patel@rugby.gov.uk
Tel: 01788 533509

Equality Impact Assessment

Service Area	Growth and Investment
Policy/Service being assessed	Planning Enforcement Local Plan 2022
Is this is a new or existing policy/service? If existing policy/service please state date of last assessment	This is a new service document
EqlA Review team – List of members	Nathan Lowde
Date of this assessment	19 th October 2022
Signature of responsible officer (to be signed after the EqlA has been completed)	Nathan Lowde

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Advisor.

If you require help, advice and support to complete the forms, please contact Minakshee Patel, Corporate Equality & Diversity Advisor via email: minakshee.patel@rugby.gov.uk or 01788 533509

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Scoping and Defining</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	The Planning Enforcement Local Plan sets out the Council’s approach to planning enforcement for all those who are involved in or affected by breaches of planning control in Rugby borough.
(2) How does it fit with Rugby Borough Council’s Corporate priorities and your service area priorities?	<p>The National Planning Policy Framework (NPPF) 2021 recommends that local planning authorities publish a Local Enforcement pPan to manage planning enforcement proactively and in a way that is appropriate to their area. Rugby Borough Council’s Corporate Strategy 2021-2024 sets out a vision for the future of the borough. The planning process is key to ensuring the delivery of the priority outcomes set within this Strategy. It is vital that we have an effective planning enforcement process to help deliver these objectives.</p> <p>This Plan has the potential to contribute towards several corporate priorities:</p> <ul style="list-style-type: none"> • Provide residents with the service they need when they need it • Ensure that our organisational structure and methods of working are agile, efficient and effective • Make sure our communities are safe • Make sure residents are proud of their community and borough • Make sure that residents of Rugby have access to high quality, affordable and environmentally sustainable homes.
(3) What are the expected outcomes you are hoping to achieve?	That the document can be used for all those who are involved in or affected by breaches of planning control in Rugby borough.

Appendix II – Enforcement Plan - Equality Impact Assessment

<p>(4) Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>The policy may affect customers or the wider community.</p>
<p><u>Stage 2 - Information Gathering</u></p>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, eg service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>
<p>(1) What does the information tell you about those groups identified?</p>	<p>Service uptake/usage is set out below: In 2020 the planning enforcement team received 370 demands In 2021 the planning enforcement team received 307 demands In 2022 the planning enforcement team have received 232 demands between January to September.</p>
<p>(2) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement? If yes, what were their views and how have their views influenced your decision?</p>	<p>No external consultation has been undertaken.</p>
<p>(3) If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>N/A</p>
<p><u>Stage 3 – Analysis of impact</u></p>	

Appendix II – Enforcement Plan - Equality Impact Assessment

<p>(1) Protected Characteristics From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination? If yes, identify the groups and how they are affected.</p>	<p>RACE No</p>	<p>DISABILITY No</p>	<p>GENDER No</p>
	<p>MARRIAGE/CIVIL PARTNERSHIP No</p>	<p>AGE No</p>	<p>GENDER REASSIGNMENT No</p>
	<p>RELIGION/BELIEF No</p>	<p>PREGNANCY MATERNITY No</p>	<p>SEXUAL ORIENTATION No</p>
<p>(2) Cross cutting themes (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how? (b) Are your proposals likely to impact on a carer who looks after older people or people with disabilities? If yes, please explain how?</p>	<p>The Planning Enforcement Local Plan is unlikely to impact social inequalities. No.</p>		
<p>(3) If there is an adverse impact, can this be justified?</p>	<p>N/A</p>		
<p>(4) What actions are going to be taken to reduce or eliminate negative or adverse impact? (this should form part of your action plan under Stage 4.)</p>	<p>N/A</p>		
<p>(5) How does the strategy/service/policy contribute to the promotion of equality? If not what can be done?</p>	<p>The Planning Enforcement Local Plan will set out what an individual would expect from the service and to ensure that the standards and level of service applies equally.</p>		

Appendix II – Enforcement Plan - Equality Impact Assessment

(6) How does the strategy/service/policy promote good relations between groups? If not what can be done?	The Planning Enforcement Local Plan sets out the Council’s approach to planning enforcement for all those who are involved in or affected by breaches of planning control in Rugby borough. In so doing so this document seeks to ensure good relations before the user and provider of the service.
(7) Are there any obvious barriers to accessing the service? If yes how can they be overcome?	No

<u>Stage 4 – Action Planning, Review & Monitoring</u>																										
If No Further Action is required then go to – Review & Monitoring																										
(1) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.	<p>EqIA Action Plan</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Action</th> <th style="text-align: center;">Lead Officer</th> <th style="text-align: center;">Date for completion</th> <th style="text-align: center;">Resource requirements</th> <th style="text-align: center;">Comments</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																						
(2) Review and Monitoring State how and when you will monitor policy and Action Plan	When the document is adopted the performance of the service will be monitored to ensure that the service standard as appended to the Planning Enforcement Local Plan are being met.																									

Please annotate your policy with the following statement:

Appendix II – Enforcement Plan - Equality Impact Assessment

'An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).'

Rugby Borough Council

Climate Change and Environmental Impact Assessment

TEMPLATE - SEPTEMBER 2021

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action. Rugby Borough Council declared a climate emergency in 2019, in doing so committed to:

- To move the Council's operations towards Carbon Neutrality by 2030.
- To establish action to tackle climate change as a key driver of all decision-making.
- To provide community leadership in reducing the impact of Climate Change.
- To take action to mitigate the impact of climate change on a Borough wide basis and beyond, through adaptation.

The Council's Corporate Strategy (2021-24) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes carbon emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to the Deputy Executive Director.

If you require help, advice and support to complete the forms, please contact Dan Green, Deputy Executive Director.

SECTION 1: OVERVIEW

Portfolio and Service Area	Growth and Investment
Policy/Service/Change being assessed	Planning Enforcement Local Plan 2022
Is this a new or existing Policy/Service/Change?	New service document
If existing policy/service please state date of last assessment	
Ward Specific Impacts	The Planning Enforcement Local Plan, sets out the Council's approach to planning enforcement for all those who are involved in or affected by breaches of planning control in Rugby borough.
Summary of assessment Briefly summarise the policy/service/change and potential impacts.	No significant impacts arising from the Enforcement Plan have been identified. The Enforcement Plan sets out how the Council's Planning Enforcement Service would operate, and customers would expect from this service, together with its service delivery targets. The Enforcement Plan will ensure that we have a robust process for dealing with breaches of planning control which includes those instances that relate to biodiversity, air quality and sustainable construction
Completed By	Nathan Lowde
Authorised By	
Date of Assessment	

SECTION 2: IMPACT ASSESSMENT

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Energy usage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Fleet usage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Sustainable Transport/Travel (customers and staff)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Community leadership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Biodiversity and habitats	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Adaptation/Mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Impact on other providers/partners	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 3: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	
Key points to be considered through review	
Person responsible for review	
Authorised by	

AGENDA MANAGEMENT SHEET

Report Title:	Development Management Service Review
Name of Committee:	Cabinet
Date of Meeting:	5 December 2022
Report Director:	Chief Officer - Growth and Investment
Portfolio:	Growth and Investment
Ward Relevance:	All
Prior Consultation:	None
Contact Officer:	Nicola Smith
Public or Private:	Public
Report Subject to Call-In:	No
Report En-Bloc:	No
Forward Plan:	No
Corporate Priorities:	This report relates to the following priority(ies): <input checked="" type="checkbox"/> Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C) <input type="checkbox"/> Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E) <input type="checkbox"/> Residents live healthy, independent lives, with the most vulnerable protected. (HC) <input checked="" type="checkbox"/> Rugby Borough Council is a responsible, effective and efficient organisation. (O) Corporate Strategy 2021-2024 <input type="checkbox"/> This report does not specifically relate to any Council priorities but
(C) Climate (E) Economy (HC) Health and Communities (O) Organisation	
Summary:	To draw down £20,000 from the Transformation Reserve to fund a review of the Development Management Service.
Financial Implications:	The cost of the review would be funded from the Transformation Reserve.

Risk Management/Health and Safety Implications:	This process will review the services processes and procedures to ensure that risks to the authority are managed and where necessary mitigated.
Environmental Implications:	None as a direct result of this report.
Legal Implications:	This process will review processes and procedures to reduce the risk of legal challenge in decision making.
Equality and Diversity:	The review will ensure that that the Councils equality and diversity policies for both staff and customers is embedded within the processes and procedures.
Options:	<ol style="list-style-type: none"> 1. Agree to fund the review from the Transformation Reserve 2. Not agree to fund the review from the Transformation Reserve
Recommendation:	The use of £20,000 from the Transformation Reserve to fund a review of the processes and procedures of the Development Management Service be approved.
Reasons for Recommendation:	To ensure that the processes and procedures of Development Management team are prioritised to deliver the Corporate Strategy. The review will also ensure that the methods of working are agile, efficient and effective, that digital opportunities are embraced, that residents are provided with the service they need, that there are robust systems of governance and accountability and where commercial activities are undertaken where it is sustainable and responsible to do so.

Cabinet - 5 December 2022

Development Management Service Review

Private Report of the Chief Officer - Growth and Investment

Recommendation

The use of £20,000 from the Transformation Reserve to fund a review of the processes and procedures of the Development Management Service be approved.

1. Background

- 1.1 The Development Management team (DM) are responsible for determining planning applications. As a frontline service, there are often competing priorities and increasing engagement from the public. The DM team was last reviewed in 2009 since that time there have been significant changes to the planning system, significant digital changes in the way processes can be undertaken and changing corporate priorities. As one of the fastest growing towns in the country, the DM team needs to be managing and facilitating this growth not acting as a barrier by not having the systems and processes in place to ensure that resources are maximised in the most efficient way.
- 1.2 The main identified drivers for this review are
- Reduction in central support grant from the Government
 - Implementation of the Councils Corporate Strategy 2021-24
 - Council focus on delivering more efficient and effective services
 - Costs associated with appeals
 - Costs associated with temporary staff
 - Difficulties of recruitment and retention of Chartered Town Planners nationally
 - A relatively small but increasing backlog of planning applications
 - The aim to achieve a 'good' level of customer service

2. The Brief and Proposed Approach

- 2.1 The brief for the project is to constructively evaluate its current approach to the delivery of services; determine 'what good looks like'; define the processes, tools, resources and skills required to achieve the agreed aims.
- 2.2 The review will also seek to build consensus around improvements required to the service, with a focus not only on improving customer service and effective working, but also on achieving job satisfaction. Processes and procedures will be developed that embed good working practices within the team and will involve the following key tasks.

- Undertake a benchmarking exercise looking at nationally recorded statistics, staffing numbers and budgets, to identify good practice and appropriate comparators.
- Undertake a desktop review of current approaches within Rugby Borough Council, including a review of procedure manuals / documentation where they exist.
- Following planning applications as they move through the system, considering how pre-apps are undertaken and how enquiries are dealt with.
- Review the Planning Committee processes from report drafting, engagement with Committee Chair and the meeting itself.
- Undertake one to one discussions with the following groups, to explore current practice and desired outcomes from the planning service:
 - Chief Officer for Growth and Investment, Chief Executive / Deputy Chief Executive
 - Development Management Manager
 - DM principal officers
 - DM planning staff
 - Portfolio Holder, Planning Committee Chair and Vice Chair
 - ICT lead
 - HR Business Partner
 - Business support lead
 - Internal consultees such as Environmental Health, green spaces
 - Regular customers (agents / applicants)
- Undertake up to 2 workshops with DM team members to collaboratively identify areas of improvement
- Provide a report outlining the findings with suggested areas of change and recommendations.

3. Finance Implications

- 3.1 The work of the DM team is highly specialised and the processes are unique to the discipline, it is therefore important that the review is undertaken by experts in the field to ensure that the recommendations meet and deliver the aspirations for the service.
- 3.2 The need to employ experts in the planning field to undertake the review means that this cannot be carried out by the Council's Transformation Team. The review however is about transforming the service and ensuring that finite resources are deployed in the right way to ensure an effective and efficient organisation.
- 3.3 The procurement of such a review would be £20,000. As this is a transformation project the cost of the review would be funded from the Transformation Reserve.

4. Options available

- 4.1 Taking the above into account, two options are proposed for the consideration of Members, namely:

Option 1

Agree the spend as set out in the report

Option 2

Not agree the spend as set out in the report

5. Conclusion and Recommendation

- 5.1 It is recommended that Cabinet approve the drawn down of £20,000 from the Transformation Reserve to allow a review of the Development Management Service to be undertaken. This review will ensure that the processes and procedures of the Development Management team are prioritised to deliver the Corporate Strategy and to ensure that the methods of working are agile, efficient and effective, that digital opportunities are embraced, that residents are provided with the service they need, that there are robust systems of governance and accountability and where commercial activities are undertaken where it is sustainable and responsible to do so.

Name of Meeting: Cabinet
Date of Meeting: 5 December 2022
Subject Matter: Development Management Service Review
Originating Department: Growth and Investment

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published online.
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Minakshee Patel
Corporate Equality & Diversity Advisor
minakshee.patel@rugby.gov.uk
Tel: 01788 533509

Equality Impact Assessment

Service Area	Growth and Investment
Policy/Service being assessed	Development Management
Is this is a new or existing policy/service? If existing policy/service please state date of last assessment	No
EqlA Review team – List of members	Nicola Smith
Date of this assessment	21 st November 2022
Signature of responsible officer (to be signed after the EqlA has been completed)	Nicola Smith

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Advisor.

If you require help, advice and support to complete the forms, please contact Minakshee Patel, Corporate Equality & Diversity Advisor via email: minakshee.patel@rugby.gov.uk or 01788 533509

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Scoping and Defining</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	To review the policies and procedures of the Development Management Team.
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	<p>The specific corporate objective that these objectives / workstreams relate to are: Outcome 4 –Organisation</p> <ul style="list-style-type: none"> • Embrace digital opportunities and nurture a culture of innovation. • Maintain robust systems of governance that ensure fairness, accountability and transparency. • Ensure that our organisational structure and methods of working are agile, efficient and effective. • Treat tax payers money with respect and ensure that our high quality services demonstrate value for money. • Undertake commercial activities in the open market where it is sustainable and responsible to do so.
(3) What are the expected outcomes you are hoping to achieve?	A Development Management team that this agile, efficient and effective and delivers on our statutory requirements, implements the corporate strategy and provides good customer service
(4) Does or will the policy or decision affect: <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	The procedures and policies which are reviewed and the recommendations reached will affect employees (in terms of their working practices) and customers and wider community groups in terms of the service we provide and the access to information.

Appendix 1

<u>Stage 2 - Information Gathering</u>	As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, eg service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).		
(1) What does the information tell you about those groups identified?	This will be undertaken as part of the review.		
(2) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement? If yes, what were their views and how have their views influenced your decision?	This will be undertaken as part of the review		
(3) If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.	Not applicable		
<u>Stage 3 – Analysis of impact</u>			
(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination? If yes, identify the groups and how they are affected.	RACE Will be considered as part of the review	DISABILITY Will be considered as part of the review	GENDER Will be considered as part of the review
	MARRIAGE/CIVIL PARTNERSHIP Will be considered as part of the review	AGE Will be considered as part of the review	GENDER REASSIGNMENT Will be considered as part of the review

Appendix 1

	RELIGION/BELIEF Will be considered as part of the review	PREGNANCY MATERNITY Will be considered as part of the review	SEXUAL ORIENTATION Will be considered as part of the review
<p><u>(2) Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how? (b) Are your proposals likely to impact on a carer who looks after older people or people with disabilities? If yes, please explain how?</p>	No		
<p>(3) If there is an adverse impact, can this be justified?</p>	Not applicable		
<p>(4) What actions are going to be taken to reduce or eliminate negative or adverse impact? (this should form part of your action plan under Stage 4.)</p>	Actions cannot be identified until the review has been undertaken		
<p>(5) How does the strategy/service/policy contribute to the promotion of equality? If not what can be done?</p>	Not applicable until the review has been undertaken		
<p>(6) How does the strategy/service/policy promote good relations between groups? If not what can be done?</p>	Not applicable until the review has been undertaken		

(7) Are there any obvious barriers to accessing the service? If yes how can they be overcome?	Not applicable until the review has been undertaken
<u>Stage 4 – Action Planning, Review & Monitoring</u>	Not applicable until the review has been undertaken
If No Further Action is required then go to – Review & Monitoring (1) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.	
(2) Review and Monitoring State how and when you will monitor policy and Action Plan	

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).’

AGENDA MANAGEMENT SHEET

Report Title: Coronation 2023 – Rugby Town

Name of Committee: Cabinet

Date of Meeting: 5 December 2022

Report Director: Chief Officer – Leisure & Wellbeing

Portfolio: Leisure & Wellbeing

Ward Relevance: All

Prior Consultation: Rugby First

Contact Officer: Benn Hall Manager, Jayne.brannan@rugby.gov.uk

Public or Private: Public

Report Subject to Call-In: No

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C)
 Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E)
 Residents live healthy, independent lives, with the most vulnerable protected. (HC)
 Rugby Borough Council is a responsible, effective and efficient organisation. (O)
[Corporate Strategy 2021-2024](#)
 This report does not specifically relate to any Council priorities but

Summary: The report seeks a new supplementary budget request for the delivery of a community event centred around the Coronation of King Charles III.

Financial Implications: A new supplementary budget as set out in the report to be funded from Reserves as a one off expenditure.

Risk Management/Health and Safety Implications: A town centre event will need to be carefully managed with engagement with Rugby Safety

Advisory Group and key town centre partners such as Rugby First.

Environmental Implications: Where possible, the use of the diesel generators will be minimised through the procurement process of giant screen hire company.

Legal Implications: None

Equality and Diversity: The activities will be open to all residents of the Borough to join in celebrations for the Coronation of His Majesty King Charles III.

Options:

1. To approve a new supplementary budget request for the delivery of a town centre event celebrating the Coronation of His Majesty King Charles III
2. To reject a new budget request

Recommendation: A supplementary budget of £20,000 for the delivery of Rugby town activities celebrating the Coronation of His Majesty King Charles III, to be funded from the Budget Stability reserve, be approved.

Reasons for Recommendation: To enable the communities of Rugby to come together and celebrate the occasion together whereby other opportunities for their engagement with the Coronation of the new King may be limited.

Cabinet – 5 December 2022

Coronation 2023 – Rugby Town

Public Report of the Chief Officer for Leisure & Wellbeing

Recommendation

A supplementary budget of £20,000 for the delivery of Rugby town activities celebrating the Coronation of His Majesty King Charles III, to be funded from the Budget Stability reserve, be approved.

1. Introduction

- 1.1 Buckingham Palace has announced that the Coronation of His Majesty King Charles III will take place on Saturday 6th May 2023.
- 1.2 The Ceremony will see His Majesty King Charles III crowned alongside The Queen Consort and will reflect the monarch's role today and look towards the future, while being rooted in longstanding traditions and pageantry.
- 1.3 Details of the Coronation have not yet been announced but it is officers opinions that appropriate planning and resourcing should be undertaken immediately to ensure availability of potential desired activities.
- 1.4 Officers have approached key partners to understand their plans and ambitions for the residents of the borough to join in what are sure to be national celebrations.
- 1.5 The delivery of Coronation activities can be separated into two main categories
 - Street Dressing
 - Community Activities
- 1.6 The Government have now announced an additional bank holiday to mark the coronation, with a UK-wide holiday on Monday 8 May 2022.
- 1.7 The additional bank holiday has been set to enable families and communities to come together to celebrate the historic occasion.

2. Street Dressing

- 2.1 Officers have obtained quotes from a local Rugby business to supply union jack bunting that can be erected throughout the town centre including Market Place, High Street, Sheep Street, Regent Street, Bank Street, Gas Street and Henry Street.

- 2.2 The delivery of union jack bunting will be dependent on appropriate infrastructure being in place and functioning.
- 2.3 Officers are currently reviewing infrastructure for the installation of union jack flags from existing buildings with the town centre, including North Street.
- 2.4 It is anticipated that official flags will be released for general resale and these will be purchased for the decorative flag poles on the town centre gyratory.

3. Community Event

- 3.1 It is anticipated there will be significant public interest in the Coronation of His Majesty King Charles III and whether the Council can enable residents of the borough to come together and watch the historical occasion.
- 3.2 Therefore it is proposed to hold a large-scale community event in a Council park or open space to enable residents to come together to engage in the occasion.
- 3.3 It is proposed a public viewing be available at Caldecott Park rather than any other Council open space. The reasons for this include:
 - Access to public toilets, both Caldecott Park and North Street
 - Open space is enclosed and provides additional security measures for gathering of large crowds
 - It is located in the town centre and would support town centre businesses with partnership opportunities such as themed activities and offers
 - Large open space that does not require road closures
 - Adequate town centre parking via Newbold Road, North Street and the John Barford Multistory
- 3.4 Further consideration has been given to Market Place as a potential additional location, but further logistical details need to be discussed with external partners before activities can be confirmed.
- 3.5 A community event in Caldecott Park will consist of:
 - A giant screen live streaming the Coronation
 - Live music with appropriate PA system
 - Street entertainers
 - Inflatables (supplementing any bicentenary inflatables)
 - Arts and crafts activities
 - Local organisation promotional opportunities (marquee stalls)
- 3.6 The provision of food and drink is to be developed through discussion and partnership with the current provider as per the lease agreement. Further concessions may be sort with local town centre and borough companies to provide at a zero based cost to the Council.

3.7 Market Place/High Street/Sheep Street

3.8 Dependent on discussions with relevant partners and organisations, a further proposal for Market Place and connecting High Street and Sheep Street could include:

- A Giant Screen live streaming the Coronation in front of the Clock Tower
- Consider the layout of the market for the day, using High Street and Sheep Street.
- Invite local businesses to have additional food and drink stalls on the day of the Coronation only.
- Hire of picnic benches to be placed on Market Place to encourage visitors to eat, drink and dwell in the town centre
- Complete official road closure to the area to facilitate residents accessing the area safely.

3.9 Partner discussions have taken place with Rugby First and it has been confirmed that Rugby First do not have plans to undertake additional activity for the Coronation weekend and would look to support the Council with any plans made through Ranger support and cleaning.

4. Indicative Table of Costs

A. Caldecott Park Community Event		
Giant Screen Hire		£3,600
Inflatables Hire		£400
PA System Hire		£864
Street Entertainer Activities		£2,500
Misc: bins, first aid		£300
		£7,664
B. Town Centre Street Dressing		
Union Jack Bunting	150 x 10m	£3,500
Coronation flags		£1,000
		£4,500
C. Market Place, High Street, Sheep Street		
Giant Screen Hire		£3,600
Picnic Benches Hire	£17.50 each x50	£875
Food and Drink Concessions		£0
Road Closure Management of Market Place, Sheep Street and High Street		£2,500 (to be confirmed)
		£6,975

5. Conclusion

- 5.1 The Coronation of His Majesty King Charles III is a significant historical event and to ensure Rugby residents are able to engage and celebrate the historic occasion, it is proposed to hold a town centre event in Caldecott Park and ensure appropriate street dressing is in place for May 2023.
- 5.2 The existing budgets do not forecast additional large scale event for the coronation and will require either the confirmation of existing budget and/or additional supplementary budget request approval.

Name of Meeting: Cabinet
Date of Meeting: 5 December 2022
Subject Matter: Coronation 2023 – Rugby Town
Originating Department: Leisure & Wellbeing

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

AGENDA MANAGEMENT SHEET

Report Title:	Bicentenary of rugby union 1823-2023
Name of Committee:	Cabinet
Date of Meeting:	5 December 2022
Report Director:	Chief Officer Leisure and Wellbeing
Portfolio:	Leisure and Wellbeing
Ward Relevance:	All
Prior Consultation:	None
Contact Officer:	Abi McCartney, Place Marketing Officer
Public or Private:	Public
Report Subject to Call-In:	No
Report En-Bloc:	No
Forward Plan:	Yes
Corporate Priorities:	This report relates to the following priority(ies): <input type="checkbox"/> Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C) <input checked="" type="checkbox"/> Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E) <input checked="" type="checkbox"/> Residents live healthy, independent lives, with the most vulnerable protected. (HC) <input type="checkbox"/> Rugby Borough Council is a responsible, effective and efficient organisation. (O) Corporate Strategy 2021-2024 <input type="checkbox"/> This report does not specifically relate to any Council priorities but
(C) Climate (E) Economy (HC) Health and Communities (O) Organisation	
Summary:	This report sets out proposed town events and dressing to mark the 200 year anniversary bicentenary celebrations of William Webb Ellis (1823-2023).
Financial Implications:	Utilisation of the existing Town Centre 2022/23 budget to fund the activities and events as detailed in the report.
Risk Management/Health and	None

Safety Implications:

Environmental Implications: None

Legal Implications: None

Equality and Diversity: All events and activities will be open to all residents within the borough

Options:

1. To approve the all proposed expenditure from the town centre improvement fund and communication budget - £52,000
2. To approve town centre dressing options only - £35,400
3. To approve community events and inflatables only - £12,100
4. To approve schools tag rugby festival and legacy equipment - £4,100
5. To reject all the proposed expenditure.

Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT a budget virement of up to £52,000 utilising existing budgets to mark the 200-year bicentenary celebrations of the game of rugby union be approved.

Reasons for Recommendation:

To acknowledge and participate in the bicentenary celebrations and ensure the town's connection to the game of rugby union is showcased throughout 2023.

Cabinet - 5 December 2022

Bicentenary of rugby union 1823-2023

Public Report of the Chief Officer for Leisure and Wellbeing

Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT a budget virement of up to £52,000 utilising existing budgets to mark the 200-year bicentenary celebrations of the game of rugby union be approved.

1. Introduction

- 1.1 The year 2023 will see the 200th anniversary of the game of rugby football where William Webb Ellis picked up the ball and ran with it on The Close at Rugby School.
- 1.2 The 200-year anniversary of the game presents a unique, once in a lifetime opportunity for the residents of Rugby and beyond to celebrate the historic events that led to the formation of a global sport.
- 1.3 The year-long anniversary celebrations will support the Council deliver its Corporate Strategy objectives as promoting Rugby as a place to do business, help businesses thrive and promote our town centre as a place to live, socialise and work.
- 1.4 Furthermore, there are opportunities to support residents live active and healthy lifestyles, promoting the community clubs that deliver a wealth of rugby union activity across the borough.
- 1.5 Therefore the following report sets out a series of opportunities and activities to promote the anniversary of the game across the town and deliver community activities to ensure a continued legacy of participation in sport and physical activity.
- 1.6 Throughout 2023, Rugby School have organised a large calendar of events to celebrate this historic occasion including, but not limited to;
 - a. Festival on The Close
 - b. Gilbert Global Pass – 200 passes of a Gilbert match ball around the globe
 - c. International schools tournaments
 - d. Warwickshire schools tournaments
 - e. Community rugby club tournaments
 - f. Worlds largest scrum world record attempt
 - g. Re-enactment of the game

- 1.7 Officers have been in discussion with Rugby School colleagues and have already agreed to support the Bicentenary celebrations through a schools art competition and an exhibition at the Rugby Art Gallery and Museum throughout the duration of the 2023 Rugby World Cup (October-November 2023).
- 1.8 The school art competition is already open for entries and will see school children submitting their designs for images of rugby union. The top 50 winning entries from each age category will have an image of their artwork reproduced on the giant rugby ball outside the Art Gallery and Museum to capture the Bicentenary celebrations for future years.
- 1.9 This report seeks approval to allocate existing budget within the town centre improvement fund and communications towards items such as:
 - a. Town dressing
 - b. Community events and inflatables
 - c. Schools tag rugby festival and legacy equipment
 - d. Entertainment and Events

2. Town Dressing

- 2.1 To maximise the town celebrations and resident/visitor experience, a series of town centre proposals and quotes have been sought for approval and installation.

Lamppost Banners

- 2.2 A series of lamppost banners are proposed to be installed on key entry points to the town including, Dunchurch Road, Leicester Road, Newbold Road, Corporation Street, North Street, Market Place, High Street, Sheep Street, Regent Street, Bank Street and Henry Street
- 2.3 Whilst these streets have been identified, the installation of lamppost banners will be restricted to appropriate infrastructure being available and legally load tested and permissions given. It is to be noted that the lampposts are not Rugby Borough Council property and will require relevant permissions and testing to have installations erected.

Bunting

- 2.4 The town centre is proposed to have specially designed Bicentenary bunting that will be installed for the majority of the calendar year. This may be removed for other celebrations such as the Coronation of His Majesty King Charles. The bunting would feature in town centre streets of Market Place, High Street, Sheep Street, Regent Street, Bank Street and Henry Street where fixings allow.
- 2.5 The bunting is installed and removed by an external contractor as the Council has neither the staff or equipment to undertake the works. The cost quoted is for the installation and removal across the areas highlighted.

Rugby Border Signage (decorative goalposts in situ)

- 2.6 New signage has been quoted for, with metal signs to be installed on the gateway to Rugby decorative rugby posts with the wording “Bicentenary of the game 1823-2023. The new signage will be installed in a similar fashion to the “In Bloom Winners” signage and mark the occasion at entry points to residents and visitors alike.

Pathway of Fame Plaque

- 2.7 The Pathway of Fame that is currently in situ in Rugby’s footpaths with associated guide map has seen additions over the previous years of significant events, including the Rugby World Cups of both the men’s and women’s teams. It is considered that the 200th anniversary of the game is also a significant event and should be added to the Pathway of Fame in a location to be determined within the town centre and subsequent information updated.

Gyratory Flagpoles

- 2.8 A new design for Bicentenary of the Game flags can be produced and flown from the decorative flagpoles in situ outside Rugby School by the William Webb Ellis statue. These flags are to be placed for the duration of 2023 marking the occasion.
- 2.9 Table 1 sets out the total quoted costs for materials and installation of the above items.

3 Community Events and Inflatables

- 3.1 To ensure the Rugby community has opportunities to participate in the bicentenary celebrations, a series of events and equipment is proposed to engage the local residents.
- 3.2 In 2015 as part of the home Rugby World Cup, the Council received 3 inflatables that were rugby themed, including; a speed pass, an accuracy pass and a tackle inflatable. These inflatables were used by local rugby clubs in the town centre to promote their clubs, be it senior men, women or mini and junior opportunities.
- 3.3 These inflatables have also been used at school fetes, sports festivals and community events and were well received by hirers and participants.
- 3.4 It is therefore proposed to purchase new rugby themed inflatables with Bicentenary art work to be used by RBC sport and recreation teams, local community clubs and community organisations throughout the calendar year and beyond.
- 3.5 Table 1 sets out initial quotes for outright purchase of individual items related to community events.

4 Schools Tag Rugby Festival and Legacy Equipment

4.1 In partnership with the Eastern Warwickshire School Sport Partnership, it is proposed to hold a large scale tag rugby primary school festival. In 2015 this was successfully delivered as part of the Host venue celebrations within Rugby and saw over 1,000 children take part in a local schools festival.

4.2 The Sport and Recreation team would support the delivery of the festival through the purchase of tag belts and balls. This equipment would then be retained by the School Sport Partnership to enable a continuation of rugby coaching and future festivals.

5 Entertainment and Events

5.1 A series of Council organised activities and entertainment is proposed to support the wider programme of events that Rugby School are delivering within the borough. The activities will be scheduled to take place within the town centre during the large scale events such as the Festivals and Guinness World Record attempt.

5.2 The intention is to supplement what is already a strong, collective offering of bicentenary celebrations and ensure the town has the opportunity to participate in entertainment and events that may not require ticket purchases.

5.3 A series of street entertainment and live town centre music is proposed to develop the visitor experience of external participants, but also to encourage local residents to visit the town centre.

5.4 As per the summer events that were delivered, the intention is to support the local town centre economy and give additional reasons for residents to visit the town centre. This proved successful for events such as the street circus performers, town centre beach and outdoor cinema. The entertainment will reflect various activities delivered as part of the Rugby Summertime activities over the previous 2 years, with live music across town centre locations on specified dates to encourage longer dwell time and encourage local residents to utilise town centre shops.

6 An Evening with @ The Benn Hall

6.1 The Benn Hall management are currently in discussion to host an Evening with event with rugby player celebrities and a 3-course meal.

6.2 The event will be managed and funded in partnership with the external promotor and internal Benn Hall budget.

6.3 The event will be scheduled to take place in the Summer of 2023 before the Rugby World Cup due to availability of rugby personalities and Rugby World Cup commitments.

7 Local Sponsorship and Business Engagement

- 7.1 Benn Hall management are currently engaging with local town centre businesses for additional activation activities that will not significant funding and could be existing budget codes.
- 7.2 These include Wear your Shirt to Work Day, a rugby themed town trail and will be centred around encouraging footfall in to the town centre.
- 7.3 There is the opportunity for local businesses to engage with the bicentenary and potential for sponsorship opportunities. At the time of the report this is unknown and a recommendation is to approve the seeking of sponsorship and external community grants to support the delivery of the proposed activities.

8. Expenditure

- 8.1 Table 1 sets out the various quotes received for the delivery of Bicentenary of the Game activity.

Table 1

Expenditure	Cost
Lamppost Banners x70	£17,750
Bunting x1,000 metres	
Gyratory Flags x16	
Rugby Border Signage Plaques x9	£2,400
Pathway of Fame Plaque	£2,000
Lamppost Banner Installation and Removal – Town Centre	£4,500
Lamppost Banner– Leicester Road Traffic Management	£5,000 (indicative cost)
Bunting installation and removal – Town Centre	£3,000
Cross Street Banner installation - Regent Street, Market Place and ASDA to High Street passageway	£750
Sub-Total	£35,400
Inflatable Theme	Cost
Passing Cage	£1,800
Goal Kicking	£2,800
Sub-Total	£4,600
Local Primary Schools	Cost
Rugby Balls and Tag Rugby Equipment x 37 primary schools	£4,400
Bicentenary Mascot Suit	£1,500
Sub-Total	£4,500
Town Centre	Cost

Town Centre Events and Activities	£2,500 x 3 days
Total	£7,500
Grand Total	£52,000

9. Conclusion

- 9.1 In conclusion, this report seeks approval to allocate existing budget to activities and expenditure towards the Council supporting the 200-year anniversary of the game of rugby union and ensure residents and visitors alike are aware of the milestone and have a sense of pride of their local heritage and the towns history.
- 9.2 Total expenditure across the various activities and items would total £52,000 if all options are approved and be funded through existing Town Centre and Communications budgets.
- 9.3 Opportunities for potential sponsorship and grant funding are to be considered and offset expenditure where successful applications can be made.

Name of Meeting: Council

Date of Meeting: 5 December 2022

Subject Matter: Bicentenary of rugby union 1823-2023

Originating Department: Leisure and Wellbeing

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Agenda No 11

AGENDA MANAGEMENT SHEET

Report Title:	Finance & Performance Monitoring 2022/23- as at 30 September
Name of Committee:	Cabinet
Date of Meeting:	5 December 2022
Report Director:	Chief Officer - Finance and Performance
Portfolio:	Finance, Performance, Legal and Governance
Ward Relevance:	All wards
Prior Consultation:	None
Contact Officer:	Dawn Lewis-Ward, Lead Accountant, dawn.lewis-ward@rugby.gov.uk, 01788 533408
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	No
Forward Plan:	Yes
Corporate Priorities:	This report relates to the following priority(ies): <input checked="" type="checkbox"/> Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C) <input checked="" type="checkbox"/> Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E) <input checked="" type="checkbox"/> Residents live healthy, independent lives, with the most vulnerable protected. (HC) <input checked="" type="checkbox"/> Rugby Borough Council is a responsible, effective and efficient organisation. (O) Corporate Strategy 2021-2024 <input type="checkbox"/> This report does not specifically relate to any Council priorities but
Summary:	This report sets out the anticipated 2022/23 financial and performance position for the Council based on data at 30 September 2022 (Quarter 2). It also presents proposed 2022/23 budget adjustments for approval as required by Financial Standing Orders.

Financial Implications:	As detailed in the main report.
Risk Management Implications:	This report is intended to give Cabinet an overview of the Council's forecast spending and performance position for 2022/23 to inform future decision-making.
Environmental Implications:	There are no environmental implications arising from this report and therefore no Climate Change and Environmental Impact Assessment is required
Legal Implications:	There are no legal implications arising from this report.
Equality and Diversity:	No new or existing policy or procedure has been recommended
Options:	Members can elect to approve, amend or reject the budget requests listed at recommendations 1 to 4.
Recommendation:	<ol style="list-style-type: none"> 1. The Council's anticipated financial position for 2022/23 be considered; 2. 2022/23 Budget Virements, as detailed in section 5, be approved; 3. Performance information in section 6 be noted; and 4. IT BE RECOMMENDED TO COUNCIL THAT 2022/23 Budget Virements as detailed within section 5 of the report, be approved.
Reasons for Recommendation:	A strong financial and performance management framework, including oversight by Members and the Leadership Team, is an essential part of delivering the Council's priorities and statutory duties.

Agenda No 11

Cabinet - 5 December 2022

Finance & Performance Monitoring 2022/23- as at 30 September

Public Report of the Chief Financial Officer

Recommendation:

1. The Council's anticipated financial position for 2022/23 be considered;
2. 2022/23 Budget Virements as detailed in section 5, be approved;
3. Performance information in section 6 be noted; and
4. IT BE RECOMMENDED TO COUNCIL THAT 2022/23 Budget Virements as detailed within section 5 of the report, be approved.

1. INTRODUCTION

As a result of the death of Her Late Majesty Queen Elizabeth II and the cancellation of the September Cabinet meeting, the position as at 30 June (Quarter 1) was circulated as a briefing paper to Cabinet and group leads. This information can be made available on request.

This is the finance and performance monitoring report for 2022/23 as at 30 September (Quarter 2), for the General Fund (GF) and Housing Revenue Account (HRA). The year-end forecasts for 2022/23 are based on actual expenditure from 01 April 2022 to 30 September 2022. The report also includes proposed 2022/23 budget adjustments which are recommended for approval by Members. In addition to the information available at 30 September, the forecast also includes the 2022/23 pay award which was approved on 2 November. Due to the timing of the announcement the data is shown as a one off item in Appendices 1 and 2 and will be factored into service lines from the next quarterly report.

The key sections of the report are laid out as follows:

- General Fund (GF) Revenue Budgets and Performance - Section 2 & Appendix 1;
- Housing Revenue Account (HRA) Revenue Budgets & Performance - Section 3 & Appendix 2;
- Capital Budgets - Section 4 and Appendices 1 (GF) & 2 (HRA);
- Further detail on recommendations for approval - Section 5
- Corporate Performance information - Section 6

Throughout the report, pressures on expenditure and income shortfalls are shown as positive values. Savings on expenditure and additional income are shown in brackets.

2. GENERAL FUND (GF) REVENUE BUDGETS

2.1 GF Overview and Key Messages:

Based on the forecast provided, the position as at 30 September (Quarter 2) is a pressure of £0.585m to the overall GF budget. This is an increase of £0.585m on the reported position for 30 June (Quarter 1).

Further details of portfolio variances and key performance indicators can be seen in Appendix 1.

The significant items included in the appendix are as follows-

- The services and portfolios most affected are as follows:
 - Regulation and Safety reports a pressure of **£0.259m** which is a positive movement of (£0.025m) from Quarter 1. The variance is largely due to a pressure of £0.260m in relation to an underachievement of car park income with usage still lower than before the pandemic.
 - Leisure and Wellbeing reports a pressure of **£0.207m** which is an adverse movement of £0.075m from Quarter 1. The variance has arisen as a result of the under achievement of income from sales, fees and charges- £0.101m of which relates to Sports and Recreation. (£0.115m) of salary savings have arisen due to a number of vacancies and this saving has been included as a pending budget adjustment. Approval has been requested within this report to transfer this to the 2022/23 Corporate Savings Target.
 - Communities and Homes reports a pressure of **£0.303m** which is an adverse movement of £0.024m from Quarter 1. The variance is due to under achievement of income in the Lifeline service, an increase in utility costs and increased expenditure on Housing Benefits.
 - Operations and Traded reports a pressure of **£0.414m** which is an adverse movement of £0.071m from Quarter 1. This is largely due to a shortfall in the number of Green Waste subscriptions sold for 2022/23 leading to an underachievement of income of £0.204m, increased cost of fuel across the fleet of £0.137m mainly due to inflation and a pressure against the Trade Waste service of £0.125m in part due to increased costs of providing this service as a result of increases in salaries, fuel, and running costs not being passed on to Trade Waste customers, plus the limitations post Covid 19 pandemic on the opportunity to expand this service to achieve service growth.
- Corporate items report a saving of **(£1.163m)** which is a positive movement of (£0.068m) from the Quarter 1 position. The variance includes a saving of (£0.209m) on Minimum Revenue Provision (MRP) due to using capital receipts in 2021/22 to fund some capital schemes from capital receipts rather than borrowing. In addition, there was considerable slippage in last years capital programme,

which also contributed to the saving this year. As part of the 2022/23 budget a £0.772m COVID recovery fund was continued to offset legacy income pressures within services, which have not fully recovered following the pandemic such as Car Parks and Sports and Leisure services; at Quarter 2 it is forecast that (£0.698m) will be required. Furthermore, (£0.235m) of the £0.500m supplementary budget approved in relation to inflationary pressures has been identified to offset pressures seen within services, mainly in relation to fuel and utilities.

Public Sector pay award - **£0.585m**. On the 2 November 2022, the 2022/23 pay settlement for Local Government was officially approved, confirming an increase of £1,925 for all staff on a pro-rata basis and a 4% increase on eligible allowances. This will be a significant pressure for the Council as the 2022/23 inflation was budgeted at 2% which equates to £0.240m. This will increase the GF staffing costs by £0.825m generating a pressure of £0.585m.

2022/23 Savings and Income Proposals

Following on from 2021/22, all savings and additional income proposals are required to have a savings delivery plan completed by the budget manager and endorsed by the Chief officer. The purpose of the forms is to increase visibility of the achievement of the targets and ensure that any issues can be dealt with at an early stage. This work was completed between March and June and the results of the analysis are included in this report. The documents are flexible and will be monitored on a frequent basis. Following the completion of the saving there will be a post implementation review to ensure that the strategic aims from the projects have been met. Further details on the delivery of savings are shown in appendix 1

- Total Portfolio savings totaling **(£0.293m)** – Following RAG ratings by Budget Managers, **(£0.213m)** are assessed as **green** and deliverable, **(0.043m)** are assessed as **amber** and are at risk of being delivered and **(£0.037m)** are assessed as **red** and are considered undeliverable.
- Total Portfolio income targets totaling **(£0.233m)** – the increased income targets have been assessed as **(£0.081m)** being **green** and deliverable, **(£0.152m)** being **amber** and at risk of being delivered and none are rated as **red** (undeliverable).
- Corporate and Salary savings of **(£0.300m)**; £0.241m has been achieved at Q2, (£0.230m) of which are subject to approval in this report. This has been assessed as **green**.
- Digitalisation savings of **(£0.095m)**; none have been achieved at Q2. This has been assessed as **amber**.
- Procurement savings of **(£0.025m)** in relation to a new framework; although the framework is now live and projects are in the pipeline, none are yet complete. This has been assessed as **amber**.

Where savings and/or income targets have been assessed as **amber** or **red**, these will continue to be monitored closely and updates will be provided in future reports.

2.2 Closedown of Accounts 2021/22

The Council's Financial Statements are currently being audited. Following completion of the audit, General Fund Balances will be reviewed and any changes since the 2021/22 outturn report will be reported in the Finance and Performance Monitoring report for Quarter 3. The audit results report will be presented to Audit & Ethics committee on 1 December.

2.3 Inflation risk

In order to manage the impact of inflation in the 2022/23 financial year, a carry forward request from 2021/22 of £0.500m was approved to establish a Corporate Inflation budget. This will be initially held centrally and will be allocated to services as the true extent of the pressure is established. This is a one-year solution to the problem and the budget setting process for 2023/24 will need to deal with the impact of the additional costs across the medium term financial plan.

The budgets for electricity and gas were increased by 15% and 20% respectively for 2022/23, however the costs have risen more sharply than anticipated and it is now expected that there will be a pressure of £0.095m as the latest data suggests electricity and gas costs are forecast to rise by 80% and 90% respectively, with further increases expected in 2023/24. Fuel costs for the vehicle fleet are now forecast to cause a pressure of £0.137m compared to the £0.157m that was forecast at Quarter 1. This pressure is due to the fluctuating wholesale prices.

Specific reviews have been requested by the Chief Officer – Finance and Performance on inflation in the key areas of electricity, gas, fuel and capital schemes. Once the true impact of inflation across the whole organisation is known in more detail, Members will be asked to approve the budget movement to offset the costs.

3 HOUSING REVENUE ACCOUNT (HRA) REVENUE BUDGETS

3.1 HRA Overview and Key Messages

Based on the forecast provided the position as at 30 September (Quarter 2), is a pressure of £0.295m to the overall HRA budget. Which is a decrease of (£0.024m) on the reported position for 30 June (Quarter 1). This pressure includes the agreed pay award.

Further details of variances can be seen in Appendix 2

The significant items included in the appendix are as follows: -

- Shortfall in rental income of **£0.177m** due to higher level of void properties than the budgeted level of 1%. The current level stands at 3.25% and is due to properties being returned in a poor condition. One way this is being addressed is by pre vacation visits to assess the condition of properties. .
- Housing repair costs are forecast to cause a pressure of **£0.547m** due to an increase in the volume of major repairs to void properties, rising material costs, increased costs associated with major roofing repairs and an increase in the cost of disrepair claims. A number of strategies to mitigate the rising costs of

void repairs being considered include pre inspections ahead of return of keys, a rolling programme for property inspections and stock condition surveys to inform the Housing Revenue Business Plan, increased estate inspections to identify properties exhibiting signs of poor condition to proactively identify where early intervention and support could reduce future repair costs.

- Increased investment income of **(£0.586m)** from holding higher cash balances due to delays in the capital programme and a rise in interest rates since the establishment of the budget.

The table below shows the anticipated balance in the Housing Revenue Account at 31 March 2023 based on the forecasts at Quarter 2

	Forecast in-year change £000	Balance £000
HRA Balance at 01 April 2022		(4,727)
Forecast variance at the end of 2022/23	295	
Net amount to be (added to)/deducted from balances		295
Anticipated HRA Balance at 31 March 2023		(4,432)

Table 3– Summary HRA Balances

3.2 Closedown of Accounts 2021/22

The Council's Financial Statements are currently being audited. Following completion of the audit, HRA Balances will be reviewed and any changes since the 2021/22 outturn report will be reported in the Finance and Performance Monitoring report for Quarter 3.

4. CAPITAL

The Council's latest approved capital programme (GF and HRA) is £54.277m. The programme has a forecast variance to year end of (£38.289m) against the budget.

4.1 General Fund – Capital (Appendix 1)

The latest approved GF capital programme is £10.738m. £3.204m of this is to be reprofiled into future years in accordance with the process in the approved Capital Strategy. The programme has a forecast variance to year end of (£0.314m) mainly as a result of (£0.150m) is for the reclassification of the Local Digital Fund project as revenue, and (£0.180m) for the Crematorium Car Park budget return.

Full details of the position for each project are set out in Appendix 1.

4.2 Housing Revenue Account (HRA) – Capital (Appendix 2)

The latest approved HRA capital programme is £43.539m. The programme has a forecast variance of (£34.771m) mainly due to the profile of the HRA capital programme, it is expected that £33.251m of the anticipated spend for 2022/23 will be reprofiled into future years in accordance with the process in the approved Capital Strategy. This is a timing issue and does not impact on the overall spend of those capital projects.

Savings of (£1.620m) have been identified due to low uptake or reduction in work required.

Full details of the position for each project are set out in Appendix 2.

5. SUPPLEMENTARY BUDGET REQUESTS AND VIREMENTS

Details of the supplementary budgets and virements, where approval is sought, are set out below:

Virement Requests for approval by Cabinet

Service Area	Virement Request	Description
	£000	
Town Centre Events	44	Creation of the Town Centre Events cost centre, Request for Place Marketing Officer post to be vired from Economic Development & Town Centre to Town Centre Events in order to put on events.
Town Centre Events	34	Following the creation of the Town Centre Events cost centre, budgets for contributions towards external partners for town events are requested to be vired from Economic Development to Town Centre Events
Hackney Carriages	37	Increase in income budget for Taxis and Hackney Carriages following review of fees to bring service to a cost neutral position. This increase in income budget is to be contributed to the 2022/23 Transformation Savings Target

Table 6– Virement Requests further details- for approval by Cabinet

Virement Requests for approval by Council

Service Area	Virement Request	Description
	£000	
Art Gallery and Museum	(65)	A reduction in salary budgets within the Art Gallery and Museum due to vacancies to be contributed to the 2022/23 Corporate Savings Target
Parks and Open Spaces	(30)	A reduction in salary budgets within Parks and Open Spaces due to vacancies to be contributed to the 2022/23 Corporate Savings Target
Visitors Centre	(20)	A reduction in salary budgets within the Visitors Centre due to vacancies to be contributed to the 2022/23 Corporate Savings Target

Customer Support Services	(40)	A reduction in salary budgets within Customer Support Services due to vacancies to be contributed to the 22/23 Corporate Savings Target
ITC and support services	(45)	A reduction in salary budgets within ITC and support services due to vacancies to be contributed to the 22/23 Corporate Savings Target
Appreticeship Scheme	(30)	A reduction in salary budgets within the Appreticeship Scheme due to vacancies to be contributed to the 22/23 Corporate Savings Target
	(230)	Total Salary savings identified within services above will reduce the Corporate Savings Target by this amount for 22/23
Transformation Savings	(150)	Savings of (£0.150m) approved in a private report of 1 August be contributed towards the 22/23 Transformation Saving Target

Table 7– Virement Requests further details- for approval by Council

6. PERFORMANCE SUMMARY

Performance management will play a significant part in officers demonstrating to all stakeholders that the positive work that is being achieved towards the Council’s aspiration to be high performing organisation, but should also be a trigger to highlight where corrective action is required.

The Corporate Strategy Delivery plan has 2022/23 targets for:

“We will implement an updated performance management framework which aligns KPIs to the Corporate Strategy and provides all stakeholders with up to date and relevant information”

“We will Implement a tool to provide live performance management information to inform decision making demonstrate VFM and identify comparisons with national best practice”

In previous years, through the Finance and Performance report Key Performance Indicators (KPI’s) have been presented and between reports all officers and Members have been able to access data through the use of the Rugby Performance Management System (RPMS).

The Leadership Team as a collective, has carried out a detailed review of existing performance management framework as a way of ensuring that the organisation is delivering its high aspirations.

At the start of the review it was recognised that there are significant benefits from using external support to add challenge and ensure that all avenues were reviewed with no obvious bias.

During August and September workshops were held with the Chief Officers, Portfolio Holders and Service Managers to discuss what the organisation has been measuring in relation to performance and how this could be improved. This led to a distinction between the measures which demonstrate the delivery of the Corporate Strategy (the

Corporate Strategy Delivery Plan) and the Strategic and operational Key Performance Indicators (KPIs) and team performance measures which targeted to demonstrate performance from an individual officer to a Corporate and level.

The diagram below shows how performance management fits together. At the centre is the team understanding operational performance – for example the number of training courses attended during the year, which feeds into performance indicators which could link to the number of boilers fitted to HRA housing, which helps demonstrate the Strategic KPI on the % of houses meeting the decent homes standard which ultimately meets our Corporate Strategy delivery plan around ensuring residents have access to high quality affordable homes.



Following on from the workshops the Leadership team have taken on board the feedback from the external support and have produced a list of KPI's and also some key statistics that it was felt would be useful for members to be aware of and these are highlighted in Appendix 3. Where information was readily available for Quarters 1 and 2 (April – June and July – September) this has been included in the report. In some instances the data can only be collected live and so analysis will begin from Quarter 3 (October – December)

In future reports the information will be presented through a dashboard approach and KPIs will be RAG rated (red, amber, green). Any measures that are rated green (on track or delivered) will potentially not be separately identified, with the focus being on the areas where there is a risk. The purpose of this is to try and ensure strategic information is presented in a user friendly way. The full details will still be made available on request.

The new performance management framework will be an ever evolving one and although the appendix highlights the KPIs and measures as at 30 September, as the organisation develops and priorities change, the measures will also evolve which could mean additions as well as some measures being removed from the model. This does not mean the information will stop being recorded, it could just mean that a recategorisation to operational KPI means the measure is retained in team performance.

Name of Meeting: Cabinet

Date of Meeting: 5 December 2022

Subject Matter: Finance & Performance Monitoring 2022/23- as at 30 September

Originating Department: Finance and Performance

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Appendix 1 - General Fund Dashboard- Quarter 2 2022/23

1) Revenue Variance								
PORTFOLIO	Current Net Budget	Exp to date plus commitments	Forecast	Employee Variance	Running Cost Variance	Income Variance	Pending Supplementary Budget/Virement	Total Variance
	£000s	£000s	£000s	£000s	£000s	£000s	£000s	£000s
Communities, Homes, Digital and Communications	2,432	5,618	2,577	(221)	230	251	(115)	260
Finance, Performance, Legal and Governance	3,212	1,637	3,242	(107)	163	(26)	0	30
Growth and Investment	1,612	1,058	1,527	(123)	74	(36)	0	(85)
Leisure and Wellbeing	3,640	2,261	3,732	(159)	151	215	(115)	207
Operation and Traded Services	4,361	1,081	4,775	22	120	272	0	414
Regulation and Safety	1,275	656	1,497	(62)	104	217	(37)	259
Executive Services	0	(404)	77	60	15	2	0	77
Transformation Change Unit	(266)	34	(228)	(31)	(9)	41	37	1
Corporate Items	4,613	709	3,680	0	(1,163)	0	230	(1,163)
TOTAL GF	20,880	12,650	20,880	(622)	(314)	936	0	0
2022/23 Approved Pay Award	0	0	0	0	0	0	0	585

2) Headcount			
PORTFOLIO	Budgeted FTE's	Actual FTE's at Q2	Vacant FTE's
Communities, Homes, Digital and Communications	104.66	85.72	(18.94)
Finance, Performance, Legal and Governance	52.3	46.57	(5.73)
Growth and Investment	29.28	28.47	(0.81)
Leisure and Wellbeing	39.61	32.51	(7.10)
Operation and Traded Services	131.29	121.83	(9.46)
Regulation and Safety	42.06	35.98	(6.08)
Executive Services	10.81	8.92	(1.89)
Transformation Change Unit	8.21	5.61	(2.60)
Corporate Items			
TOTAL GF	418.22	365.61	(52.61)

3) Reserves Summary							
PORTFOLIO	Balance as at 1/04/22	Forecast contribution (to)/from	Forecast balance as at 31/03/23	Forecast contribution (to)/from	Forecast balance as at 31/03/24	Forecast contribution (to)/from	Forecast balance as at 31/03/25
	£000s	£000s	£000s	£000s	£000s	£000s	£000s
General Fund Balances	(2,175)	585	(1,590)	0	(1,590)	0	(1,590)
General Fund Carry forwards	(1,182)	1,182	(0)	0	(0)	0	(0)
Business Rates Equalisation Fund	(11,304)	(3,954)	(15,258)	(3,791)	(19,048)	0	(19,048)
Budget Stability Fund	(2,707)	173	(2,534)	0	(2,534)	0	(2,534)
Other Corporate Reserves	(1,977)	374	(1,604)	143	(1,461)	148	(1,313)
Total Corporate Reserves	(19,345)	(1,640)	(20,985)	(3,648)	(24,633)	148	(24,485)
Communities, Homes, Digital and Communications	(598)	(14)	(612)	106	(506)	105	(401)
Finance, Performance, Legal and Governance	(39)	3	(36)	5	(31)	1	(30)
Change and Transformation	(900)	(1,500)	(2,400)	200	(2,200)	150	(2,050)
Growth and Investment	(162)	40	(122)	0	(122)	0	(122)
Leisure and Wellbeing	(126)	51	(75)	0	(75)	0	(75)
Operation and Traded Services	(155)	85	(70)	2	(68)	2	(66)
Regulation and Safety	(224)	100	(124)	(11)	(135)	(39)	(174)
Total portfolio earmarked reserves	(2,204)	(1,235)	(3,439)	302	(3,137)	219	(2,918)
Total Reserves	(21,549)	(2,875)	(24,424)	(3,346)	(27,770)	367	(27,403)

4) Delivery of new savings targets				
PORTFOLIO	Total	Red	Amber	Green
	£000s	£000s	£000s	£000s
Communities, Homes, Digital and Communications	(104)	(17)	(40)	(47)
Finance, Performance, Legal and Governance	(23)	0	(3)	(20)
Growth and Investment				
Leisure and Wellbeing				
Operation and Traded Services	(90)	(17)		(73)
Regulation and Safety	(3)	(3)		
Executive Services				
Transformation Change Unit	(73)			(73)
Corporate Items				
TOTAL GF	(293)	(37)	(43)	(213)
Red/amber savings		Red	Amber	
		£000s	£000s	
Procurement saving within Bereavement Services on maintenance costs		(3)		
Cleaning costs for the Town Hall (£8k) plus license costs within IT (£7k)		(17)		
Mainly relates to savings on fuel and vehicle repairs at WSU		(17)		
Reduction of postage within Elections and Council Tax			(3)	
Mainly due to savings on cleaning and repairs & maintenance within the Housing Advice & Benefits Team			(40)	
TOTAL GF		(37)	(43)	

5) Capital Summary					
PORTFOLIO	Current Budget	Exp to date & commitments	Forecast	Pending Supplementary Budget / Virement / Reprofilling	Total Variance
	£000s	£000s	£000s	£000s	£000s
Communities, Homes, Digital and Communications	2,269	359	1,535	(584)	(150)
Finance, Performance, Legal and Governance	52	3	32	0	(20)
Growth and Investment					
Leisure and Wellbeing	1,673	940	1,578	(101)	6
Operation and Traded Services	6,248	2,354	3,926	(2,322)	0
Regulation and Safety	496	38	149	(197)	(150)
Executive Services					
Transformation Change Unit					
Corporate Items					
TOTAL GF	10,738	3,694	7,220	(3,204)	(314)

6) Delivery of new income targets				
PORTFOLIO	Total	Red	Amber	Green
	£000s	£000s	£000s	£000s
Communities, Homes, Digital and Communications	(31)			(31)
Finance, Performance, Legal and Governance				
Growth and Investment				
Leisure and Wellbeing				
Operation and Traded Services	(47)		(47)	
Regulation and Safety	(50)			(50)
Executive Services				
Transformation Change Unit	(105)		(105)	
Corporate Items				
TOTAL GF	(233)	0	(152)	(81)

7) Revenue variance narrative				
PORTFOLIO	£000S	Previous Variance (Q1)	Movement	REASON FOR VARIANCES
Communities, Homes, Digital and Communications	260	184	76	<p>Pressures</p> <p>-£61,000 within the Housing Advice & Benefits Team due to net salary savings of (£0.181m) due to delays in recruitment to vacant posts offset by agency staffing costs, an estimated liability £0.062m for Council Tax for Private Sector Lease properties which is yet to be billed and a deferred budget saving target of (£0.157m) to mitigate the increased cost of temporary accommodation is not achievable due to the lack of suitable accommodation on the open market.</p> <p>-£98,000 within Corporate Property due to estimated increases in utilities. Current data suggests that Electricity will increase by 80% and Gas by 90%, with further increases next year. Contract with ESPO who forward purchase utilities on behalf of RBC to ensure the best possible price per unit is achieved.</p> <p>-£135,000 within Housing Benefit Payments. The forecast is based on current year's expenditure, expected subsidy payment, debts outstanding & bad debt provisions (at September 2022).</p> <p>-£64,000 within Welfare Services. As in the previous two financial years, the income target is forecast to be underachieved again as despite advertising, the Lifeline service operates in a competitive market with other Local Authorities and the Private Sector.</p> <p>Savings</p> <p>-(£37,000) within Customer Support services due to staff vacancies.</p> <p>-(£22,000) within the Apprenticeship Scheme due to vacancies while positions are assessed for requirements.</p> <p>-(£37,000) within Housing Strategy and Enabling due to a vacancy within the service.</p> <p>Other minor pressures/(savings) total (£2,000). Included in the portfolio variance is a pending budget adjustment of (£115,000) relating to the Digital & Communications salary savings due to vacancies which will be contributed to the 2022/23 Corporate Savings Target.</p>
Finance, Performance, Legal and Governance	30	49	(19)	<p>Pressures</p> <p>-£77,000 within General Financial Services due to net cost of covering vacancies on the Financial Services Team with Agency staff, due to two vacancies in the Financial Services Team (one has now been filled) Other minor pressures relate to purchase of the subscriptions including a new performance management tool and the increased cost of the Procurement Shared Service with NBB.</p> <p>Savings</p> <p>-(£59,000) within Revenues due to New Burdens Funding and savings from staff vacancies.</p> <p>Other minor pressures/(savings) total £12,000</p>
Growth and Investment	(85)	11	(96)	<p>Pressures</p> <p>-£110,000 within Planning Services due to agency staff covering vacancies and dealing with a backlog of planning applications. The backlog was a result of the gap between staff leaving and agency staff being recruited. This pressure is being covered through the saving within Economic Development.</p> <p>Savings</p> <p>-(£70,000) within Development Strategy due to a gap between a member of staff leaving and the post being recruited to and a further post that will be recruited to once the new manager is in post.</p> <p>-(£125,000) within Economic Development due to two fixed term vacancies which are no longer required and a member of staff who started mid year against a full years budget.</p> <p>Other minor pressures/(savings) total £0</p>
Leisure and Wellbeing	207	132	75	<p>Pressures</p> <p>-£101,000 within Sports and Recreation mainly due to a projected underachievement on the sales fees and charges income target and unsuccessful recruitment to income generating vacancies. This is an ongoing budget pressure and is likely not contained to 2022/23. At the moment there are no viable options to cover this income shortfall.</p> <p>-£42,000 within the Benn Hall due to staffing costs following regrade and a projected loss of income on Room Hire, overspend on new equipment and maintenance.</p> <p>-£37,000 within the Parks due to an underachievement of income from Rugby in Bloom and overspend on expenditure within Rugby in Bloom, plus an underachievement of income through the hire of playing pitches in the borough.</p> <p>-£24,000 within the Visitor Centre due to an underachievement of income through sales made through the Visitor Centre shop.</p> <p>Other minor pressures/(savings) total £3,000 Included within the portfolio variance is (£115,000) pending budget adjustment relating to salary underspends due to vacancies which will be contributed to the 22/23 Corporate Savings Target.</p>
Operation and Traded Services	414	343	71	<p>Pressures</p> <p>- £204,000 Green Waste - underachievement of income due to shortfall of 5,100 subscriptions against target 28,000. Service and charge under review to ensure service breaks even in future years.</p> <p>- £137,000 Fuel - due to increase in fuel costs from 21/22 partly mitigated by savings arising from period of industrial action. Route optimisation for all collection rounds to ensure services are being delivered efficiently and spend on fuel is minimised is being progressed.</p> <p>- £116,000 Trade Waste - underachievement of income due to ongoing effect of Covid 19 pandemic and opportunity to expand this service to achieve the growth in income budgeted for. Service and costs under review to ensure the Trade Waste Service does not run at a loss in future years.</p> <p>- £87,000 Salaries and Agency staff - net overspend against the cost of covering staff absences due to levels of Annual Leave, and long and short term sickness levels by the appointment of additional temporary staff on fixed term contracts and agency staff. This cost has been partly mitigated by savings arising from the industrial action April/May 2022, and vacancy savings. The service are collaborating with Human Resources and Occupational Health to manage return to work from sickness absences to reduce ongoing high levels of absence</p> <p>- £63,000 Vehicles - Contract Hire and repair and maintenance. Service to monitor spend on repairs of ageing fleet to inform Vehicle Replacement Capital Programme</p> <p>- £23,000 Bulky Waste collections - delay in increased collections due to industrial action and staff absence levels to be rectified November 2022</p> <p>Savings</p> <p>-(£91,000) Net saving from the cost of collection of recycled material and credits received from WCC due to reduction in overall tonnage collected due to period of industrial action and a reduction in charge per tonne of recycled waste, partly offset by an overspend on Bulk Freight. Service to evaluate future use of Bulk Freight to mitigate future overspends.</p> <p>-(£76,000) Vacancy savings Streetscene and Grounds Maintenance teams. Long term vacancies to be considered on effect on service delivery for future years</p> <p>-(£44,000) Income from developers for new bins</p> <p>Other minor pressures/(savings) total (£5,000)</p>
Regulation and Safety	259	284	(25)	<p>Pressures</p> <p>-£290,000 within Car Parks due to an underachievement of income of £260,000; this largely relates to Pay and Display income. Parking fees are being reviewed as part of a new parking strategy. There are also overspends on Business Rates, security costs, machine repair costs and cash collection costs totalling £30,000.</p> <p>Other minor pressures/(savings) total (£31,000)</p> <p>Included within the portfolio variance is a pending budget adjustment of (£37,000) within Taxis and Hackney Carriages to bring the service to a budgeted cost neutral position, following the review of fees. The budget will be transferred to the 22/23 Transformation Savings Target.</p>
Executive Services	77	89	(12)	<p>Pressures</p> <p>-£77,000 within HR mainly due to an anticipated pressure on recruitment costs of £53,000 and increased occupational therapy support and wellbeing costs of £26,000. This is partly offset by (£17,000) due to staff vacancies</p> <p>Other minor pressures/(savings) total £0</p>
Transformation Change Unit	1	3	(2)	<p>Other minor pressures/(savings) total £1,000</p> <p>Included within the portfolio variance is a pending budget adjustment of £37,000 to reduce the 22/23 Transformation Savings Target</p>
Corporate Items	(1,163)	(1,095)	(68)	<p>Savings</p> <p>-(£209,000) against Minimum Revenue Provision (MRP) budget due to a decision in 2021/22 to fund some capital schemes from capital receipts rather than borrowing. Also there was considerable slippage in last year capital programme, which also produces a saving this year.</p> <p>-(£21,000) against Net Cost of Borrowing due to rising interest rates</p> <p>-(£698,000) released against Covid recovery fund- this offsets income pressures within services</p> <p>-(£235,000) released against centrally held Inflation budget- this offsets fuel and utility inflationary pressures within services</p> <p>N.B. Of the £250,000 budget carry forward from 21/22 in relation to covid security improvements, £150,000 of this has now been approved for use on funding capital schemes. Further details will be provided in later reports.</p>
TOTAL GF	0	0	0	

8) Capital variance narrative				
PORTFOLIO	£000S			REASON FOR VARIANCES
Communities, Homes, Digital and Communication Capital	(150)			<p>Savings</p> <p>-(£150,000)- Local Digital fund due to scheme being reclassified as a revenue project</p> <p>Reprofiling of Budget</p> <p>-(£140,000) - Corporate Property Enhancements due to staff resources and decisions to be made on the town hall complex</p> <p>-(£294,000) - Housing Acquisition Fund until a suitable property is found</p> <p>-(£200,000) - Carbon Management Plan for solar panels at the Art Gallery and Queens Diamond Jubilee Centre delayed due to staff resources</p> <p>-£50,000 - ICT Renewal Programme to be offset against 23/24 budget for realignment of budgets due to advance purchases due to current market situation</p>
Finance, Performance, Legal & Governance Capital	(20)			<p>Savings</p> <p>-(£20,000)- Asset Management System - estimated saving due to completion of the project</p>
Leisure and Wellbeing Capital	6			<p>Reprofiling of Budget</p> <p>-(£101,000) Preventative Conservation due to the staff responsible for the project being recently recruited there has been a delay in the project starting; it is unlikely this project will begin before the end of the financial year.</p> <p>Pressures</p> <p>-£6,000 -Newbold Quarry Works costs have increased since original budget was set.</p>
Operation and Traded Services Capital	0			<p>Reprofiling of Budget</p> <p>-(£462,000) The budget for great central walk bridges in relation to ongoing refurbishment works in collaboration with WCC to be reprofiled in line with programme of works</p> <p>-(£1,860,000) The budget for the replacement vehicle programme to be reprofiled due to delays in placing orders and the deliver of vehicles</p>
Regulation and Safety Capital	(150)			<p>Pressures</p> <p>£30,000-Rainsbrook Crematorium- £10,000 is due to additional costs on the Memorialisation scheme; this has been approved by the Joint Committee but further report required for Council approval of additional budget. There is also unbudgeted spend of £20,000 on upgrading of the Music and Webcast system.</p> <p>Reprofiling of Budget</p> <p>-(£141,000) - Rainsbrook Cemetery Preparation awaiting a report for the remainder of the works.</p> <p>-(£26,000) - Memorial Safety due to staff absences within Bereavement Services.</p> <p>-(£30,000) - Croop Hill Chapel Refurbishment due to delay in starting the scheme and revised budget requiring approval due to costs increasing since the original budget was set.</p> <p>Savings:</p> <p>-(£180,000) - Crematorium Car Park Extension - budget return as scheme no longer planned to go ahead.</p>
TOTAL GF	(314)			

Appendix 2- Cabinet Summary as at September 2022 (Quarter 2) - Housing Revenue Account (HRA)

1) Revenue Variance							2) Headcount		
SERVICES	Current Net Budget	Exp to date plus commitments	Forecast	Pending Supplementary Budget/ Virement	Pending Reserve Movement Requests	Total Variance	Budgeted FTE's	Actual FTE's at Q1	Vacant FTE's
	£000s	£000s	£000s	£000s	£000s	£000s			
Rent income from dwellings	(16,110)	(7,954)	(15,956)	0	0	153	88.32	77.81	(10.51)
Rent income from land and buildings	(120)	(59)	(119)	0	0	1			
Charges for services	(905)	(441)	(882)	0	0	24			
Contributions towards expenditure	(161)	(38)	(142)	0	0	20			
Total Income	(17,296)	(8,493)	(17,099)	0	0	199			
Transfer to Housing Repairs Account	3,899	2,734	4,446	0	0	547			
Supervision & Management	5,157	3,798	5,206	0	0	49			
Rent, rates, taxes and other charges	125	5	125	0	0	0			
Depreciation and impairment	3,239	0	3,239	0	0	0			
Debt management costs	24	0	0	0	0	(24)			
Provision for bad or doubtful debts	66	0	1	0	0	(66)			
Total Expenditure	12,511	6,536	13,018	0	0	507			
HRA share of Corporate/Democratic Core Costs	290	0	292	0	0	2			
Net Cost of HRA Services	(4,495)	(1,956)	(3,789)	0	0	708			
Interest payable and similar charges	1,295	0	1,295	0	0	(0)			
Interest and Investment Income	(191)	0	(777)	0	0	(586)			
Net Operating Expenditure	(3,391)	(1,956)	(3,271)	0	0	122			
Contributions to (+) / from (-) reserves	49	0	49	0	0	0			
Revenue Contributions to Capital Expenditure	3,342	0	3,342	0	0	0			
(Surplus) / Deficit for the Year on HRA Services	0	(1,956)	120	0	0	122			
2022/23 Approved Pay Award	0	0	0	0	0	173			
Total (Surplus) / Deficit	0	(1,956)	120	0	0	295			

3) Reserve Balances						
Name of reserve / balance	Balance as at 1/04/22	Forecast contribution (to)/from	Forecast balance as at 31/03/23	Forecast contribution (to)/from	Forecast balance as at 31/03/24	Forecast balance as at 31/03/25
	£000s	£000s	£000s	£000s	£000s	£000s
Housing Revenue Account Balances	(4,727)	295	(4,432)	0	(4,432)	(4,432)
HRA Balances (Capital)	(15,014)	0	(15,014)	(2,359)	(17,373)	(20,119)
HRA Major Repairs Reserve	(3,805)	0	(3,805)	(363)	(4,168)	(5,153)
Housing Repairs Account	(93)	93	(0)	0	(0)	(0)
Sheltered Housing Rent Reserve	(309)	(48)	(357)	(48)	(405)	(453)
Right to buy Capital Receipts	(9,942)	0	(9,942)	(3,034)	(12,976)	(16,010)
	(33,890)	340	(33,549)	(5,804)	(39,353)	(46,166)

5) Capital Summary					
SERVICE	Current Budget	Exp to date & commitments	Forecast	Pending Supplementary Budget / Virement/ Slippage	Total Variance
	£000s	£000s	£000s	£000s	£000s
Automated Repairs System	74	0	74	0	0
Bell House Redevelopment	0	(45)	0	0	0
Biart Place - Capital	17,875	336	300	0	(17,575)
Housing Management System	175	0	175	0	0
Laundries	113	82	82	0	(31)
Fire Risk Prevention Works	105	7	105	0	0
Rewiring	201	20	201	0	0
Lifeline Renewal Programme	56	2	56	0	0
Finlock Gutter Improvements	130	6	30	0	(100)
Rebuilding Retaining Walls	113	13	40	0	(73)
Replacement Footpaths	182	(6)	60	0	(122)
Door Security Systems	126	1	126	0	0
Electrical Upgrades - Community Rooms	50	37	45	0	(5)
Boiler Works - Tanser Court	114	0	0	0	(114)
LED lighting	5	0	5	0	0
Roof Refurbishment - Tanser Court	175	0	0	0	(175)
Driveways	45	0	45	0	0
Fire Risk Prevention works voids	105	12	50	0	(55)
Rewiring Unplanned Renewals	100	0	100	0	0
Fire Risk Unplanned Renewals	40	0	40	0	0
Roofing unplanned renewals	50	0	50	0	0
Disabled Adaptations	216	111	316	0	100
Kitchen Modifications	812	9	100	0	(712)
Kitchen Modifications Voids	200	20	50	0	(150)
Kitchens non voids	52	2	52	0	0
Heating Upgrades	1,022	309	700	0	(322)
Bathroom Modifications	391	129	391	0	0
Bathroom Modifications - voids	175	13	50	0	(125)
Bathrooms non voids	84	(9)	25	0	(59)
Housing Window Replacement	20	3	20	0	0
Carbon Management Plan (HRA)	739	0	370	0	(369)
Purchase of Council Houses	12,672	(5)	2,310	0	(10,362)
Rugby Gateway - Cala Homes	0	(3)	0	0	0
Rounds Gardens Capital	2,166	229	300	0	(1,866)
Rounds Gardens demolition	5,000	6	2,500	0	(2,500)
Property Repairs Team Vehicle	86	0	0	0	(86)
Victoria House Roof Refurbishment	70	0	0	0	(70)
	43,539	1,281	8,768	0	(34,771)

6) Revenue variance narrative		
SERVICE	£000s	REASON FOR VARIANCES
Rent income from dwellings	153	The shortfall in income is due to the current level of voids - there are 113 properties currently vacant, 3.25% of stock. Estimates for voids levels are for 34 properties, 1% of stock. Voids are high due to properties being returned in a poor condition, one way this is being addressed by pre vacation visits to assess the condition of properties. This has been offset by a slightly lower than expected net reduction in property sales and purchases for this quarter.
Rent income from land and buildings	1	
Charges for services	24	The shortfall in income is due to the current level of voids
Contributions towards expenditure	20	
Transfer to Housing Repairs Account	547	The challenges faced within the service for delivering within budget include a higher proportion of void properties being returned in very poor condition requiring major repairs, the significant increase in the cost of building materials due to the legacy of the Covid 19 pandemic and inflation, increased costs due to a number of major roofing repairs, and the rising incidence and cost of disrepair claims. A number of strategies to mitigate further increases in costs being considered include pre inspections ahead of key returns for void properties to ensure that outgoing tenants understand what condition they are obliged to leave properties in, a rolling programme of property inspections and stock condition surveys, and a more proactive approach to identify properties displaying signs of poor condition where early intervention and support could be provided to reduce future repair costs.
Supervision & Management	49	The variance largely reflects movements in utility costs and salaries. The latest estimates show that electricity will be increased by 100% from October 2022, followed by a further increase of 19% from October 2024. Gas prices are estimated to increase by 89% for 2022/23 followed by a further increase of 300% for 2023/24
Rent, rates, taxes and other charges	0	
Depreciation and impairment	0	
Debt management costs	(24)	No debt management costs are anticipated as there is currently not requirement to borrow.
Provision for bad or doubtful debts	(66)	Bad debt provision calculations for September 2022 indicate that only a small amount needs to be added to the provision at this time.
HRA share of Corporate/Democratic Core Costs	2	
Interest payable and similar charges	(0)	
Interest and Investment Income	(586)	Higher than forecast reserve balances coupled with rising interest rates has produced additional investment income
Contributions to (+) / from (-) reserves	0	
Revenue Contributions to Capital Expenditure	0	
TOTAL HRA	122	

7) Capital variance narrative		
SERVICE	£000s	REASON FOR VARIANCES
Automated Repairs System	0	
Bell House Redevelopment	0	
Biart Place - Capital	(17,575)	Reprofiled for design fees and future build costs
Housing Management System	0	
Laundries	(31)	Saving as no further spend is planned
Fire Risk Prevention Works	0	
Rewiring	0	
Lifeline Renewal Programme	0	
Finlock Gutter Improvements	(100)	Planned programme of gutter replacement to be established
Rebuilding Retaining Walls	(73)	Shortage of suitable trades and surveyors to develop planned repair programme
Replacement Footpaths	(122)	Shortage of surveyors to identify footpath repairs
Door Security Systems	0	
Electrical Upgrades - Community Rooms	(5)	
Boiler Works - Tanser Court	(114)	Works currently on hold
LED lighting	0	
Roof Refurbishment - Tanser Court	(175)	Works currently on hold
Driveways	0	
Fire Risk Prevention works voids	(55)	Savings based on volume of works to date and forecast to March 2023
Rewiring Unplanned Renewals	0	
Fire Risk Unplanned Renewals	0	
Roofing unplanned renewals	0	
Disabled Adaptations	100	Overspend is due to larger projects and unpredictability of spend. This will allow the continuation of basic adaptations and will be funded from savings on the heating upgrade programme
Kitchen Modifications	(712)	Reprofiled as a new supplier is required
Kitchen Modifications Voids	(150)	Reprofiled as a new supplier is required
Kitchens non voids	0	
Heating Upgrades	(322)	Saving based on the number of boiler to be replaced as part of this years programme
Bathroom Modifications	0	
Bathroom Modifications - voids	(125)	Savings based on number of bathrooms replaced to date and forecast to March 2023
Bathrooms non voids	(59)	Savings based on number of bathrooms replaced to date and forecast to March 2023
Housing Window Replacement	0	
Carbon Management Plan (HRA)	(369)	Scheme reduction due to lower tenant engagement than anticipated
Purchase of Council Houses	(10,362)	Reprofiled into future years for ongoing purchases.
Rugby Gateway - Cala Homes	0	
Rounds Gardens Capital	(1,866)	Reprofiled into future period as not yet in full design
Rounds Gardens demolition	(2,500)	Reprofiled in future period due to demolition not starting until August
Property Repairs Team Vehicle	(86)	Reprofiled due to delays with suppliers
Victoria House Roof Refurbishment	(70)	Budget to be returned due to decisions being made on the site
	(34,771)	

Appendix 3

Portfolio Holder	Chief Officer	Team	Code & Title	Target	Q1	Q2	Assignee	CSDP outcome	KPI	Key Statistic	Narrative
A) Key Statistics											
Clr Carolyn Robbins	Finance and Performance	across the council	% spend Rugby, Warwickshire and West Midlands	to be baselined	34%	n/a	Catrina Rimen	organisation	No	Yes	the statistics are available a quarter in arrears
Clr Carolyn Robbins	Finance and Performance	across the council	%of spend Rugby (All supplier sizes)	to be baselined	16%	n/a	Catrina Rimen	organisation	No	Yes	the statistics are available a quarter in arrears
Clr Carolyn Robbins	Finance and Performance	across the council	% of spend Rugby (SMEs)	to be baselined	12%	n/a	Catrina Rimen	organisation	No	Yes	the statistics are available a quarter in arrears
Clr Carolyn Robbins	Finance and Performance	across the council	% of agreed internal audit actions implemented on time	to be baselined	68%	71%	Catrina Rimen	organisation	No	Yes	
Clr Carolyn Robbins	Legal and Governance	Electoral Services	Electoral registrations within the borough of Rugby as a % of eligible population	to be baselined	TBC	TBC	Sara Bolderston-Bowers	organisation	No	Yes	Annual Canvass is presently being undertaken and electoral register will be published on 1st December. This will be reported in Quarter 3
Clr Carolyn Robbins	Legal and Governance	Equality and Diversity	% of employees at Rugby Borough Council identifying as having a disability	to be baselined	18.01%	18.05%	Martin North	organisation	No	Yes	
Clr Carolyn Robbins	Legal and Governance	Equality and Diversity	% of employees at Rugby Borough Council who identify as male	to be baselined	51.42%	54.77%	Martin North	organisation	No	Yes	
Clr Carolyn Robbins	Legal and Governance	Equality and Diversity	% of employees at Rugby Borough Council who identify as female	to be baselined	48.58%	45.23%	Martin North	organisation	No	Yes	
Clr Carolyn Robbins	Legal and Governance	Equality and Diversity	% of employees at Rugby Borough Council in the age bracket 15-24	to be baselined	3.24%	3.65%	Martin North	organisation	No	Yes	
Clr Carolyn Robbins	Legal and Governance	Equality and Diversity	% of employees at Rugby Borough Council in the age bracket 25-44	to be baselined	38.66%	39.55%	Martin North	organisation	No	Yes	
Clr Carolyn Robbins	Legal and Governance	Equality and Diversity	% of employees at Rugby Borough Council in the age bracket 45-59	to be baselined	42.11%	40.38%	Martin North	organisation	No	Yes	
Clr Carolyn Robbins	Legal and Governance	Equality and Diversity	% of employees at Rugby Borough Council in the age bracket 60-64	to be baselined	11.13%	11.76%	Martin North	organisation	No	Yes	
Clr Carolyn Robbins	Legal and Governance	Equality and Diversity	% of employees at Rugby Borough Council in the age bracket 65+	to be baselined	4.86%	4.66%	Martin North	organisation	No	Yes	
Clr Carolyn Robbins	Finance and Performance	Revenues	% of current year bid levy collected	to be baselined	67.9	79.8	Chryssa Burdett	organisation	No	Yes	
Clr Carolyn Robbins	Finance and Performance	Revenues	% of all years bid levy collected	to be baselined	N/A	N/A	Chryssa Burdett	organisation	No	Yes	This is an annual measure. Results will be available in April 2023

Portfolio Holder	Chief Officer	Team	Code & Title	Target	Q1	Q2	Assignee	CSDP outcome	KPI	Key Statistic	Narrative
Cllr Derek Poole	Regulation and Safety	Bereavement Services	% of local deceased usage through Rainsbrook Crematorium	70%	77%	86%	Lorraine Marley	Organisation	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of deployments of fly tipping cameras	to be baselined	3 including 10 visits to site	3 including 12 visits to site	Verna Zinclair	Health and Communities	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of patrols of parks specifically to engage with dog owners regarding dogs and leads, dog fouling and micro-chipping	to be baselined	3	0	Claire Baldwin	Health and Communities	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	% of environmental permitted sites due for inspection completed	100%	100	88	Henry Biddington	Health and Communities	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	% of premises within the Rugby Borough that have attained the Food Hygiene Rating 5	75%	74.7	74	Henry Biddington	Health and Communities	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	% of premises within the Rugby Borough that have attained the Food Hygiene Rating 4 and above	90%	89.7	89	Henry Biddington	Health and Communities	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	% of premises within the Rugby Borough that have attained the Food Hygiene Rating 3 and above	95%	96.1	95.7	Henry Biddington	Health and Communities	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	% of premises within the Rugby Borough that have attained the Food Hygiene Rating 2 and below	5%	3.9	4.4	Henry Biddington	Health and Communities	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	% of premises improved after a Food Hygiene Rating Scheme requested revisit	100%	100%	No requests.	Henry Biddington	Health and Communities	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of domestic nuisance complaints received	to be baselined	193	245	Verna Zinclair	Health and Communities	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of complaints received regarding industrial and commercial nuisance	to be baselined	2	0	Verna Zinclair	Health and Communities	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Total number of licensed HMOs	to be baselined	N/A	192 on public register	Verna Zinclair	Health and Communities	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of new HMOs Licensed	to be baselined	9	5	Verna Zinclair	Health and Communities	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of HMOs where formal action taken under any Regulation and Safety legislation	to be baselined	0	0	Verna Zinclair	Health and Communities	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of Statutory Nuisances cases which required formal action	to be baselined	0	0	Verna Zinclair	Health and Communities	No	Yes	
Cllr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of fly tipping recorded incidents	to be baselined	463	401	Verna Zinclair	Health and Communities	No	Yes	

Portfolio Holder	Chief Officer	Team	Code & Title	Target	Q1	Q2	Assignee	CSDP outcome	KPI	Key Statistic	Narrative
Clr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Cost of fly tips to council	to be baselined	N/A	N/A	Verna Zinclair	Health and Communities	No	Yes	Plan to introduce for Q3 following review of value.
Clr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of unauthorised encampments attended by Community Wardens for public safety and welfare visits	to be baselined	3 (34 caravans and associated vehicles in total)	1 (15 caravans and associated vehicles in total)	Claire Baldwin	Health and Communities	No	Yes	
Clr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Cost of unauthorised encampments to the council	to be baselined	N/A	N/A	Vernas Zinclair	Health and Communities	No	Yes	Plan to introduce for Q3 following review of value.
Clr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Air quality improvements (average)	%	N/A	N/A	Henry Biddington	Health and Communities	No	Yes	This is an annual measure. Results will be available in April 2023
Clr Derek Poole	Regulation and Safety	Licensing and Parking	Total number of animal licences	to be baselined		26	26 Zulfeqar Rahman	Health and Communities	No	Yes	
Clr Emma Crane	Digital and Communications	Communications	% of EIR requests completed within the statutory timeframe	100%	100%	N/A	Matthew Deaves	Organisation	No	Yes	
Clr Emma Crane	Digital and Communications	Communications	% of Subject Access Requests (SAR) completed within the statutory timeframe	100%	100%	N/A	Matthew Deaves	Organisation	No	Yes	
Clr Emma Crane	Digital and Communications	Communications	% of adult population who are active users of the Rugby Waste App	15%	N/A	17.66%	Matthew Deaves	Organisation	No	Yes	
Clr Emma Crane	Digital and Communications	Customer Services	Total number of services requested or enquiries answered via the CSC	to be baselined	24,128	21,206	Emma Tomlinson	Organisation	No	Yes	
Clr Emma Crane	Digital and Communications	Customer Services	% service requests by digital channel (Quarterly)	60	N/A	N/A	Emma Tomlinson	Organisation	No	Yes	Data not yet collected, will be available for future reporting
Clr Emma Crane	Digital and Communications	Customer Services	% digital service requests by self serve or structured webform (Quarterly)	to be baselined	N/A	N/A	Emma Tomlinson	Organisation	No	Yes	Data not yet collected, will be available for future reporting
Clr Emma Crane	Digital and Communications	Customer Services	£ Cost per digital transaction (Annual)	to be baselined	N/A	N/A	Emma Tomlinson	Organisation	No	Yes	To be baselined by top five processes (by number of processes raised)
Clr Emma Crane	Digital and Communications	IT & Digital Services	% service requests by digital channel (Monthly)	60	54	55	Stuart Mewes	Organisation	No	Yes	This relates to ServiceDesk
Clr Emma Crane	Digital and Communications	IT & Digital Services	Critical systems downtime (%)	0%	0%	1%	Stuart Mewes	Organisation	No	Yes	List needs defining - task for MT
Clr Emma Crane	Digital and Communications	IT & Digital Services	£ Cost per capita for technology running costs	to be baselined	N/A	N/A	Stuart Mewes	Organisation	No	Yes	Data not yet collected, will be available for future reporting
Clr Emma Crane	Digital and Communications	IT & Digital Services	% Waste Electrical and Electronic Equipment reused or recycled (by item)	95%	100	100	Stuart Mewes	Climate	No	Yes	

Portfolio Holder	Chief Officer	Team	Code & Title	Target	Q1	Q2	Assignee	CSDP outcome	KPI	Key Statistic	Narrative
Cllr Emma Crane	Communities and Homes	Assets	RFSH: % of homes that have had required gas safety checks	to be baselined	N/A	99.87%	Bill Winter	Health and Communities	No	Yes	
Cllr Emma Crane	Communities and Homes	Assets	RFSH: % of homes in buildings that have had all the necessary fire risk assessments	to be baselined	N/A	100%	Bill Winter	Health and Communities	No	Yes	
Cllr Emma Crane	Communities and Homes	Assets	RFSH: % of homes in buildings that have had all the necessary asbestos management surveys or reinspection	to be baselined	N/A	90.90%	Bill Winter	Health and Communities	No	Yes	
Cllr Emma Crane	Communities and Homes	Assets	RFSH: % of homes in buildings that have had all the necessary legionella risk assessments	to be baselined	N/A	100%	Bill Winter	Health and Communities	No	Yes	
Cllr Emma Crane	Communities and Homes	Assets	RFSH: % of homes in buildings where the communal passenger lifts have had all the necessary checks	to be baselined	N/A	100%	Bill Winter	Health and Communities	No	Yes	
Cllr Emma Crane	Communities and Homes	C&P	lotto - revenue generated to support VCS	to be baselined	6,409	6,409	Mary Jane Gunn	Health and Communities	No	Yes	excludes proportion collected to the RBC communities fund pot which goes towards VCS SLA's - Q1 £2253 and Q2 £2226
Cllr Emma Crane	Communities and Homes	HABT	number of households in temporary accommodation (excluding B&B)	to be baselined	30	13	George Balogun	Health and Communities	No	Yes	
Cllr Emma Crane	Communities and Homes	HABT	number of homelessness applications determined where we have a duty	to be baselined	49	46	George Balogun	Health and Communities	No	Yes	
Cllr Emma Crane	Communities and Homes	HABT	number of applicants on the housing waiting list	to be baselined	616	550	George Balogun	Health and Communities	No	Yes	
Cllr Emma Crane	Communities and Homes	HABT	Number of discretionary awards paid (Council Tax)	to be baselined	15	4	Carrie Maskell	Health and Communities	No	Yes	
Cllr Emma Crane	Communities and Homes	HABT	Number of discretionary awards paid (rent)	to be baselined		Q1 and 2 combined 65	Carrie Maskell	Health and Communities	No	Yes	
Cllr Emma Crane	Communities and Homes	HABT	Number of households in receipt of HB	to be baselined	2,354	2,322	Carrie Maskell	Health and Communities	No	Yes	
Cllr Emma Crane	Communities and Homes	HABT	Number of households in receipt of CTR	to be baselined	5,200	5,209	Carrie Maskell	Health and Communities	No	Yes	
Cllr Emma Crane	Communities and Homes	HABT	% of housing benefit claims processed within 20 days	to be baselined	N/A	N/A	Carrie Maskell	Health and Communities	No	Yes	Data not yet collected, will be available for future reporting
Cllr Emma Crane	Communities and Homes	HABT	number of homelessness applications determined where we do not have a duty	to be baselined	0	5	George Balogun	Health and Communities	No	Yes	
Cllr Emma Crane	Communities and Homes	Housing Services	Number of evictions for rent arrears	to be baselined	2	2	Marie Barlow	Health and Communities	No	Yes	

Portfolio Holder	Chief Officer	Team	Code & Title	Target	Q1	Q2	Assignee	CSDP outcome	KPI	Key Statistic	Narrative
Clr Emma Crane	Communities and Homes	Housing Services	Number of evictions for ASB	to be baselined	0	0	Marie Barlow	Health and Communities	No	Yes	
Clr Emma Crane	Communities and Homes	Housing Services	Number of evictions - other	to be baselined	0	0	Marie Barlow	Health and Communities	No	Yes	
Clr Emma Crane	Communities and Homes	Housing Services	Average void (key to key)	to be baselined	72.67	75.33	Marie Barlow	Health and Communities	No	Yes	
Clr Emma Crane	Communities and Homes	PRS	RFSH: satisfaction with repairs	to be baselined	N/A	N/A	Mary Jane Gunn	Health and Communities	No	Yes	Methodology for collection is prescribed by the regulator for social housing and comes into effect from April 2023. Is a work in progress.
Clr Howard Roberts	Leisure and Wellbeing	Arts and Heritage Services (RAGM - Rugby Art Gallery and Museum)	RAGM 001 No. of visitors to Rugby Art Gallery & Museum	3000 per quarter	11053		Silvia Zombardo	Health and Communities	No	Yes	
Clr Howard Roberts	Leisure and Wellbeing	Parks and Open Spaces	Retention of Silver and above in Heart of England In Bloom Awards	Silver	-	Awarded Gold	TBC	Health and Communities	No	Yes	
Clr Howard Roberts	Leisure and Wellbeing	Parks and Open Spaces	Number of trees planted on RBC green space	100	0	0	TBC	Climate	No	Yes	Planting takes place during Q3
Clr Howard Roberts	Leisure and Wellbeing	Sport and Recreation	Queens Diamond Jubilee Centre complaints	<30 per quarter	9	3	Tom Allen	Organisation	No	Yes	
Clr Howard Roberts	Leisure and Wellbeing	Sport and Recreation	Number of young people participating in Swim School Programme supporting them to lead active and healthy lifestyles	1,900	1,901	1,903	Tom Allen	Health and Communities	No	Yes	
Clr Howard Roberts	Leisure and Wellbeing	Sport and Recreation	% of participants completing 90% or more of the Family Weight Management Course per annum	80%	N/A	88%	Tom Allen	Health and Communities	No	Yes	
Clr Ian Picker	Growth and Investment	Development Management	% of refused planning applications	<20%	8.06	7.05	Richard Holt	Organisation	No	Yes	
Clr Ian Picker	Growth and Investment	Development Management	No. of determined planning applications	to be baselined	186	156	Richard Holt	Organisation	No	Yes	
Clr Ian Picker	Growth and Investment	Development Management	No. of appeals received	to be baselined	7	3	Richard Holt	Organisation	No	Yes	
Clr Ian Picker	Growth and Investment	Development Management	Number of enforcement cases closed	to be baselined	82	79	Richard Holt	Organisation	No	Yes	
Clr Ian Picker	Growth and Investment	Development Management	Serve Enforcement Notice within 28 days of instruction	90%	N/A	N/A	Richard Holt	Organisation	No	Yes	Data not yet collected, will be available for future reporting
Clr Ian Picker	Growth and Investment	Development Management	Number of planning applications received	1018	239	237	Richard Holt	Organisation	No	Yes	

Portfolio Holder	Chief Officer	Team	Code & Title	Target	Q1	Q2	Assignee	CSDP outcome	KPI	Key Statistic	Narrative
Clr Kathryn Lawrence	Operations & Traded Services	Grounds Maintenance	% of planned works completed on time inc grass cutting, hedge trimming and bedding planted	to be baselined	N/A	N/A	Deborah Middlemiss	Health and Communities	No	Yes	Number of beds for summer and winter schemes
Clr Kathryn Lawrence	Operations & Traded Services	Property Repairs	% of jobs completed within our definition of First-time fix	75%	N/A	71%	Rachael Savage	Health and Communities	No	Yes	
Clr Kathryn Lawrence	Operations & Traded Services	Property Repairs	Average number of days to complete a repair	to be baselined	N/A	7.70%	Rachael Savage	Health and Communities	No	Yes	
Clr Kathryn Lawrence	Operations & Traded Services	Property Repairs	Number of overdue jobs, planned and responsive	to be baselined	N/A	N/A	Rachael Savage	Health and Communities	No	Yes	Data not yet collected, will be available for future reporting
Clr Kathryn Lawrence	Operations & Traded Services	Property Repairs	Number of emergency repairs received as % of total	to be baselined	N/A	5%	Rachael Savage	Health and Communities	No	Yes	
Clr Kathryn Lawrence	Operations & Traded Services	Property Repairs	Number of Handyperson jobs completed	to be baselined	N/A	106	Rachael Savage	Health and Communities	No	Yes	
Clr Kathryn Lawrence	Operations & Traded Services	Street Cleansing	% of sweeping routes completed on time	to be baselined	N/A	N/A	Anton Cuscito	Health and Communities	No	Yes	Data will be collated in preparation for next reporting period
Clr Kathryn Lawrence	Operations & Traded Services	Street Cleansing	Number of fly tips collected after 5 days (of reporting)	0	147	69	Anton Cuscito	Health and Communities	No	Yes	
B) Key Performance Indicators											
all	all	all	% delivery of MTFS savings targets	100%	51%	73%	All Chief Officers	organisation	Yes	No	This will be separated into the portfolios to show performance at all levels of the organisation
Clr Carolyn Robbins	Finance and Performance	across the council	% of outstanding sundry debtors over 28 days from invoice date	to be baselined	N/A	N/A	Chryssa Burdett	organisation	Yes	No	Data will be collated in preparation for next reporting period
Clr Carolyn Robbins	Legal and Governance	Democratic Services	% Member attendance of training programme	to be baselined	22%	22%	Claire Waleczek	organisation	Yes	No	
Clr Carolyn Robbins	Legal and Governance	Democratic Services	% Member attendance at Committee meetings	to be baselined	78%	77%	Claire Waleczek	organisation	Yes	No	
Clr Carolyn Robbins	Legal and Governance	Democratic Services	Number of complaints received relating to Members and Parish Council Members	to be baselined	7	2	Claire Waleczek	organisation	Yes	No	
Clr Carolyn Robbins	Finance and Performance	Revenues	% of Current year Council Tax collected	98.60%	37.3	57.9	Chryssa Burdett	organisation	Yes	No	the % are cumulative due to the payment of the council tax, the performance to target will be reviewed at year end. Being +50% at month 6 suggests the organisation is on track
Clr Carolyn Robbins	Finance and Performance	Revenues	% of current year Non-domestic Rates collected	98.60%	31.7	58.0	Chryssa Burdett	organisation	Yes	No	the % are cumulative due to the payment of the NNDR, the performance to target will be reviewed at year end. Being +50% at month 6 suggests the organisation is on track

Portfolio Holder	Chief Officer	Team	Code & Title	Target	Q1	Q2	Assignee	CSDP outcome	KPI	Key Statistic	Narrative
Clr Carolyn Robbins	Finance and Performance	Revenues	% of all years Council Tax collected	98.60%	N/A	N/A	Chryssa Burdett	organisation	Yes	No	This is an annual measure. Results will be available in April 2023
Clr Carolyn Robbins	Finance and Performance	Revenues	% of all year Non-domestic Rates collected	98.60%	N/A	N/A	Chryssa Burdett	organisation	Yes	No	This is an annual measure. Results will be available in April 2023
Clr Derek Poole	Regulation and Safety	Bereavement Services	Number of cremations held at Rainsbrook	1000	272	282	Lorraine Marley	Organisation	Yes	No	
Clr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	% of planned food inspections completed	98%	74	62	Henry Biddington	Health and Communities	Yes	No	influenced by number of officers available but also when inspections are due in compliance with FSA guidance.
Clr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	How many accidents have been reported by businesses where RBC enforce via the HSE RIDDOR system	to be baselined	12	11	Henry Biddington	Health and Communities	Yes	No	
Clr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	How many accidents needed investigation	to be baselined	6	8	Henry Biddington	Health and Communities	Yes	No	
Clr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of HMOs Inspected (including annual inspection of licenced HMOs, inspections for all new applications and any enforcement e.g. complaints).	to be baselined	8	13	Verna Zinclair	Health and Communities	Yes	No	
Clr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of Community Protection Warnings issued	to be baselined	2 Housing ASB	2 Barking dogs	Verna Zinclair	Health and Communities	Yes	No	
Clr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of Community Protection Notices issued	to be baselined	2 Housing ASB	0	Verna Zinclair	Health and Communities	Yes	No	
Clr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of fly tipping incidents investigated	100%	100	100	Verna Zinclair	Health and Communities	Yes	No	
Clr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of fly tipping incidents where action taken against suspected or actual fly tippers (e.g. warning letters, fixed penalty notices, prosecutions).	to be baselined	15	14	Verna Zinclair	Health and Communities	Yes	No	Plan to introduce for Q3 following review of value.
Clr Derek Poole	Regulation and Safety	Environmental Health and Community Safety	Number of patrols in high risk areas (e.g. fly tipping, ASB)	to be baselined	1,042	1,058	Claire Baldwin	Health and Communities	Yes	No	
Clr Derek Poole	Regulation and Safety	Licensing and Parking	Average time to process new taxi driver licence applications	12 weeks	12 weeks	12 weeks	Zulfeqar Rahman	Health and Communities	Yes	No	requires passing test, providing information about previous convictions, certificates of good conduct if have lived abroad and consideration by Committee if required by the policy so can be very variable.
Clr Derek Poole	Regulation and Safety	Licensing and Parking	Average time to process new vehicle licence applications and transfers.	24 hours	24 hours	24 hours	Zulfeqar Rahman	Health and Communities	Yes	No	New measure. Will be baselined for quarter 3
Clr Derek Poole	Regulation and Safety	Licensing and Parking	Average time to process new operator licence applications	36 hours	36 hours	36 hours	Zulfeqar Rahman	Health and Communities	Yes	No	New measure. Will be baselined for quarter 3
Clr Derek Poole	Regulation and Safety	Licensing and Parking	Average time to process new premises alcohol licences	31 days	36 days	36 days	Zulfeqar Rahman	Health and Communities	Yes	No	New measure. Will be baselined for quarter 3

Portfolio Holder	Chief Officer	Team	Code & Title	Target	Q1	Q2	Assignee	CSDP outcome	KPI	Key Statistic	Narrative
Clr Derek Poole	Regulation and Safety	Licensing and Parking	Average time to process new alcohol personal licence applications	20 days	20 days	20 days	Zulfeqar Rahman	Health and Communities	Yes	No	New measure. Will be baselined for quarter 3
Clr Derek Poole	Regulation and Safety	Licensing and Parking	% of annual animal licence inspections due in year completed	100%	Unavailable		Zulfeqar Rahman	Health and Communities	Yes	No	will be available for quarter 3
Clr Derek Poole	Regulation and Safety	Licensing and Parking	% of annual taxi operator licence inspections due in year completed	100%	Unavailable	Unavailable	Zulfeqar Rahman	Health and Communities	Yes	No	New measure. Will be baselined for quarter 3
Clr Derek Poole	Regulation and Safety	Safety and Resilience	Total number of RIDDOR reportable incidents reported to the HSE	to be baselined	0		Letitia Lees/Wendy Browett	Organisation	Yes	No	
Clr Emma Crane	Digital and Communications	Communications	% of Freedom of Information (FOI) requests completed within the statutory timeframe	90%	83%	N/A	Matthew Deaves	Organisation	Yes	No	
Clr Emma Crane	Digital and Communications	Communications	Number of data breaches and near misses reported internally	0	2	3	Matthew Deaves	Organisation	Yes	No	
Clr Emma Crane	Digital and Communications	Communications	Number of data breaches reported to the Information Commissioner's Office (ICO)	0	0	0	Matthew Deaves	Organisation	Yes	No	
Clr Emma Crane	Digital and Communications	Communications	% of Residents that respond to annual survey as "proud of the Borough" (Annual)	30	N/A	N/A	Matthew Deaves	Health and Communities	Yes	No	First annual survey in discovery now for release quarter 4
Clr Emma Crane	Digital and Communications	Communications	% alignment of the demographic of respondents to annual survey and the demographic of the borough (Annual)	70	N/A	N/A	Matthew Deaves	Health and Communities	Yes	No	First annual survey in discovery now for release quarter 4
Clr Emma Crane	Digital and Communications	Communications	# complaints (Quarterly)	300	N/A	N/A	Matthew Deaves	Organisation	Yes	No	Data connector to new complaints system being built and release by quarter 4
Clr Emma Crane	Digital and Communications	Communications	% of Residents that respond to annual survey as "having Trust in the Council" (Annual)	60	N/A	N/A	Matthew Deaves	Organisation	Yes	No	We do need to baseline this and this is the CSDP metric we've programmed in.
Clr Emma Crane	Digital and Communications	Communications	% of complaints responded to within the timeframe	90%	60%	N/A	Matthew Deaves	Organisation	Yes	No	
Clr Emma Crane	Digital and Communications	Customer Services	The % of requests resolved at the first point of contact (Quarterly)	70	N/A	N/A	Emma Tomlinson	Organisation	Yes	No	Data not yet collected, will be available for future reporting
Clr Emma Crane	Digital and Communications	Customer Services	Service Delivery Metric: Customer satisfaction (Quarterly)	75	N/A	N/A	Emma Tomlinson	Organisation	Yes	No	Data not yet collected, will be available for future reporting
Clr Emma Crane	Digital and Communications	IT & Digital Services	Average resolution time (business hours) of all IT services tickets	48	3.43	2.81	Stuart Mewes	Organisation	Yes	No	
Clr Emma Crane	Communities and Homes	Assets	RFSH: homes that do not meet the Decent Homes Standard	to be baselined	0%	0%	Bill Winter	Health and Communities	Yes	No	

Portfolio Holder	Chief Officer	Team	Code & Title	Target	Q1	Q2	Assignee	CSDP outcome	KPI	Key Statistic	Narrative
Cllr Emma Crane	Communities and Homes	Assets	% of homes rated (EPC) C and above	to be baselined	N/A	N/A	Bill Winter	Health and Communities	Yes	No	Data not yet collected, will be available for future reporting
Cllr Emma Crane	Communities and Homes	Housing Services	% of rent roll collected	to be baselined	70.18%	86.29%	Marie Barlow	Health and Communities	Yes	No	
Cllr Emma Crane	Communities and Homes	C & P	Number of affordable homes delivered	to be baselined	32	80	Craig Oakley	Health and Communities	Yes	No	Collation of the required data is dependent on RP's providing information so is never ready until middle of following month
Cllr Emma Crane	Communities and Homes	HABT	number of people rough sleeping	to be baselined	6	8	George Balogun	Health and Communities	Yes	No	
Cllr Emma Crane	Communities and Homes	HABT	number of households in bed and breakfast for less than 6 weeks	to be baselined	0	3	George Balogun	Health and Communities	Yes	No	
Cllr Howard Roberts	Leisure and Wellbeing	Parks and Open Spaces	% of tree inspections overdue	<10%	N/A	N/A	TBC	Organisation	Yes	No	Data not yet collected, will be available for future reporting
Cllr Howard Roberts	Leisure and Wellbeing	Parks and Open Spaces	% of playground inspections overdue	<10%	N/A	N/A	TBC	Health and Communities	Yes	No	Data not yet collected, will be available for future reporting
Cllr Howard Roberts	Leisure and Wellbeing	Sport and Recreation	SPRE 003 Leisure Centre Visits	>30,000 per month	N/A	N/A	Tom Allen	Health and Communities	Yes	No	Data not yet collected, will be available for future reporting
Cllr Howard Roberts	Leisure and Wellbeing	Sport and Recreation	SPRE 007 Total number of contacts in top 30% LSOA's - all ages	>1000	1,983	1,472	Tom Allen	Health and Communities	Yes	No	
Cllr Ian Picker	Growth and Investment	Development Management	Quality of decision making - Number of appeals relating to a Major application upheld as a % of all Major Applications determined (Annual)	<10%	0.024%	0.024%	Richard Holt	Organisation	Yes	No	
Cllr Ian Picker	Growth and Investment	Development Management	Quality of decision making - Number of appeals relating to a non-major application upheld as a % of all non-major applications determined (Annual)	<10%	0.007%	0.007%	Richard Holt	Organisation	Yes	No	
Cllr Ian Picker	Growth and Investment	Development Management	Speed of decision making - % of major planning applications determined within 13 weeks	60%	75%	100%	Richard Holt	Organisation	Yes	No	
Cllr Ian Picker	Growth and Investment	Development Management	Speed of decision making - % of minor planning applications determined within 8 weeks	70%	84%	85%	Richard Holt	Organisation	Yes	No	
Cllr Ian Picker	Growth and Investment	Development Management	Speed of decision making - % of other planning application determined within 8 weeks	80%	87%	86%	Richard Holt	Organisation	Yes	No	
Cllr Ian Picker	Growth and Investment	Development Management	Average end to end time for Land Charge Searches (in days)	10	4.58	3.6	Richard Holt	Organisation	Yes	No	
Cllr Ian Picker	Growth and Investment	Development Management	Number of enforcement cases received	to be baselined	77	97	Richard Holt	Organisation	Yes	No	

Portfolio Holder	Chief Officer	Team	Code & Title	Target	Q1	Q2	Assignee	CSDP outcome	KPI	Key Statistic	Narrative
Clr Ian Picker	Growth and Investment	Development Management	Determine action within 8 weeks where there is a breach of planning control and it is expedient to take action	80%	N/A	N/A	Richard Holt	Organisation	Yes	No	Data not yet collected, will be available for future reporting
Clr Ian Picker	Growth and Investment	Development Strategy	The number of new homes built within the year (Annual)	663	N/A	N/A	Neil Holly	Economy	Yes	No	Data not yet collected, will be available for future reporting
Clr Ian Picker	Growth and Investment	Development Strategy	Rugby Borough Council's 5 year land supply for new homes (Annual)	>5 Years	N/A	N/A	Neil Holly	Organisation	Yes	No	Data not yet collected, will be available for future reporting
Clr Ian Picker	Growth and Investment	Development Strategy	Rugby exceeds the Housing Delivery Test (Annual)	> 95%	N/A	N/A	Neil Holly	Organisation	Yes	No	Data not yet collected, will be available for future reporting
Clr Ian Picker	Growth and Investment	Major Projects and Economic Development	£ of inward investment (Annual)	to be baselined	N/A	N/A	Helen Nightingale	Economy	Yes	No	Data not yet collected, will be available for future reporting
Clr Ian Picker	Growth and Investment	Major Projects and Economic Development	Number of new businesses trading (Annual)	to be baselined	N/A	N/A	Helen Nightingale	Economy	Yes	No	Data not yet collected, will be available for future reporting
Clr Ian Picker	Growth and Investment	Major Projects and Economic Development	Number of vacant units in the town centre (Annual)	to be baselined	N/A	N/A	Helen Nightingale	Economy	Yes	No	Data not yet collected, will be available for future reporting
Clr Ian Picker	Growth and Investment	Major Projects and Economic Development	Number of visitors to the town centre (Annual)	to be baselined	N/A	N/A	Helen Nightingale	Economy	Yes	No	Data not yet collected, will be available for future reporting
Clr Ian Picker	Growth and Investment	Major Projects and Economic Development	£ external funding received to contribute to regeneration programme (Annual)	to be baselined	N/A	N/A	Helen Nightingale	Economy	Yes	No	Data not yet collected, will be available for future reporting
Clr Ian Picker	Growth and Investment	Major Projects and Economic Development	Employment rate (Annual)	to be baselined	N/A	N/A	Helen Nightingale	Economy	Yes	No	Data not yet collected, will be available for future reporting
Clr Ian Picker	Growth and Investment	Major Projects and Economic Development	Number of businesses trading in the borough (Annual)	to be baselined	N/A	N/A	Helen Nightingale	Economy	Yes	No	Data not yet collected, will be available for future reporting
Clr Kathryn Lawrence	Operations & Traded Services	Property Repairs	Customer satisfaction via perception survey %	95%	N/A	N/A	Rachael Savage	Organisation	Yes	No	Officers to work to provide a software solution to provide this data for future reports
Clr Kathryn Lawrence	Operations & Traded Services	Property Repairs	% of minor voids completed on time (up to 7 days)	95%	N/A	96%	Rachael Savage	Health and Communities	Yes	No	Minor, Standard, Major priorities have only recently been agreed with the housing team and added to the spreadsheet, data to be added for Q3
Clr Kathryn Lawrence	Operations & Traded Services	Property Repairs	% of standard voids completed on time (up to 4 weeks)	95%	N/A	95%	Rachael Savage	Health and Communities	Yes	No	
Clr Kathryn Lawrence	Operations & Traded Services	Property Repairs	% of major voids completed on time (up to 8 weeks)	95%	N/A	96%	Rachael Savage	Health and Communities	Yes	No	
Clr Kathryn Lawrence	Operations & Traded Services	Property Repairs	% of major, standard and minor voids	to be baselined	N/A	Minor - 22.6% Standard - 23.7% Major - 53.6%	Rachael Savage	Health and Communities	Yes	No	

Portfolio Holder	Chief Officer	Team	Code & Title	Target	Q1	Q2	Assignee	CSDP outcome	KPI	Key Statistic	Narrative
Clr Kathryn Lawrence	Operations & Traded Services	Waste & Recycling	% of household waste sent for reuse, recycling and composting	50%	40.80%		Anton Cuscito	Climate	Yes	No	
Clr Kathryn Lawrence	Operations & Traded Services	Waste & Recycling	Tonnage of residual waste per household KG	120	N/A	102	Anton Cuscito	Climate	Yes	No	
Clr Kathryn Lawrence	Operations & Traded Services	Waste & Recycling	% of residual waste sent to landfill	0	N/A	18.97%	Anton Cuscito	Climate	Yes	No	
Clr Kathryn Lawrence	Operations & Traded Services	Waste & Recycling	Number of missed Refuse Bins	to be baselined	416	416	Anton Cuscito	Climate	Yes	No	
Clr Kathryn Lawrence	Operations & Traded Services	Waste & Recycling	Number of missed Green waste Bins	to be baselined	599	527	Anton Cuscito	Climate	Yes	No	
Clr Kathryn Lawrence	Operations & Traded Services	Waste & Recycling	Number of missed Recycling Bins	to be baselined	270	562	Anton Cuscito	Climate	Yes	No	
Clr Kathryn Lawrence	Operations & Traded Services	Waste & Recycling	% Contamination of recycling collected at kerbside	10%	12.16%		Anton Cuscito	Climate	Yes	No	

AGENDA MANAGEMENT SHEET

Report Title: Access to energy efficiency measures – updated Eco-Flex statement of intent for Rugby

Name of Committee: Cabinet

Date of Meeting: 5 December 2022

Report Director: Chief Officer - Communities and Homes

Portfolio: Communities, Homes, Digital and Communications

Ward Relevance: All

Prior Consultation: Officers

Contact Officer: Michelle Dickson (Chief Officer - Communities and Homes) tel: 01788 533843 and email: michelle.dickson@rugby.gov.uk

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C)
 Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E)
 Residents live healthy, independent lives, with the most vulnerable protected. (HC)
 Rugby Borough Council is a responsible, effective and efficient organisation. (O)
[Corporate Strategy 2021-2024](#)
 This report does not specifically relate to any Council priorities but

Summary: The Energy Company Obligation (ECO) is a government energy efficiency scheme administered by Ofgem.

The Council adopted a Statement of Intent for Eco 3 in June 2020. This is a statement setting out

criteria for financially vulnerable households living in less energy efficient properties to be able to access additional support from energy providers, in respect of measures to improve the thermal efficiency of their homes.

Whilst there is no requirement to participate in publishing a Statement of Intent it does make good sense as to do so enables households to potentially access energy improvement measures via the ECO4 scheme.

As ECO 3 has now been superseded by ECO4, which runs to March 2026, it requires an update to the Statement of Intent, should the Council wish to continue to enable qualifying households to access potential energy efficient measures in this way.

The proposed revised statement of intent for Rugby (appendix 1) is both Office of Gas and Electricity Markets (OFGEM) and Government's Department for Business, Energy & Industrial Strategy (BEIS) Compliant.

A change from the previous Eco Flex requirement is that only low income and vulnerable households are supported. This enables resource to be targeted to where it is most needed.

The updated Statement of Intent sets out Rugby's criteria for continued supporting of households most vulnerable to fuel poverty.

Financial Implications:

There are no direct financial implications arising from the revised Statement of Intent. However, there will be implications in respect of officer time to promote the availability of the scheme and liaise with obligated suppliers.

Risk Management/Health and Safety Implications:

It should be noted that the final decisions on whether any individual household will benefit from energy saving improvements rest with obligated suppliers and their contractors. Inclusions in a Declaration of Eligibility issued by the council does not guarantee the installation of measures.

Environmental Implications:

An environmental impact assessment has been carried out and forms appendix 2 to this report.

Legal Implications:

The Energy Companies Obligation derives from The Electricity and Gas (Energy Companies

Obligation) Order 2012. However, there are no direct legal issues arising from this report.

Equality and Diversity:

The EOI is a mechanism to help qualifying households access measures to help them affordably heat their home. The Equality Impact Assessment that accompanied the June 2020 report has been updated and is attached as Appendix 3.

Options:

- i) Adopt the updated statement of intent
- ii) Do not adopt the updated statement of intent – however this will diminish opportunities for qualifying households in private sector housing to access improvements.

Recommendation:

The updated statement of intent (appendix 1) to enable the delivery of Eco-Flex measures to support residents of private-sector housing in Rugby be adopted.

Reasons for Recommendation:

The adoption of the updated statement of intent is an opportunity to support the financially most vulnerable households, living in harder to heat homes to access potential measures to appropriately insulate and heat their homes.

This will in turn reduce the incentive to use fossil fuels and wood for heating homes. Reducing energy demand in some of our most fuel poor homes will also help towards reducing carbon emissions in the Borough.

Cabinet - 5 December 2022

Access to energy Efficiency measures - updated Eco-flex statement of intent for Rugby

Public Report of the Chief Officer - Communities and Homes

Recommendation

The updated statement of intent (appendix 1) to enable the delivery of Eco-Flex measures to support residents of private-sector housing in Rugby be adopted.

1.0 Introduction

- 1.1 The Council adopted its statement of intent in response to ECO3 in June 2020 (https://www.rugby.gov.uk/downloads/download/318/eco_flexible_eligibility_statement_of_intent). With the introduction of ECO4, it is appropriate to revisit the statement of intent to ensure that it is reflective of the new round of funding.
- 1.2 The redrafted statement of intent has been reviewed by EON, who have confirmed that it is compliant with the OFGEM and BEIS requirements. There are no material amendments from the version adopted in June 2020.

2.0 Eco Flex

- 2.1 ECO4 places a legal obligation on obligated suppliers to reduce heating costs for low-income and vulnerable households by delivering energy efficiency and heating measures.
- 2.2 One route to identifying eligible households is through the ECO4 Flexible eligibility (ECO4 Flex), where Local Authorities and suppliers identify households that meet the eligibility requirements set out in the ECO4 Order.
- 2.3 Suppliers can deliver up to 50% of their obligation through the ECO4 Flex route.

3.0 Conclusion

- 3.1 The adoption of the updated statement of intent to reflect ECO4 is an opportunity to enable the households in Rugby most vulnerable to fuel poverty can potentially access support in improving the energy performance of their homes.

- 3.2 By helping to tackle the issue of cold homes we are also supporting the wider levelling-up agenda in respect of enabling healthier outcomes for our residents. In addition, reducing energy demand in some of our most fuel poor homes will also help towards reducing carbon emissions in the Borough.
- 3.3 A Cost of Living – Themes and Progress report was presented and accepted by scrutiny committee on 14 November 2022, including a recommendation that Scrutiny Committee support the delivery of the workstreams. The report included an update of the statement of intent as one of the workstreams (5.3).

Name of Meeting: Cabinet

Date of Meeting: 5 December 2022

Subject Matter: Access to Energy Efficiency measures - updated Eco-flex statement of intent for Rugby

Originating Department: Communities and Homes

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A



Rugby Borough Council

ECO4 Flexible Eligibility Statement of Intent

Publication Date: XX/XX/XXXX

Version number: 2.0

Publication on web site: www.XXXXXX.gov.uk

This statement sets out Rugby Borough Council’s flexible eligibility criteria for the Energy Company Obligation (ECO4) scheme from April 2022 – March 2026.

The ECO4 scheme will focus on supporting low income and vulnerable households. The scheme will improve the least energy efficient homes helping to meet the Government’s fuel poverty and net zero commitments.

The flexible approach for Local Authorities (LAs) to identifying fuel poor and vulnerable households who may benefit from heating and energy saving measures is referred to as “ECO4 Flex”.

The Council welcomes the introduction of the ECO4 Flex eligibility routes as it helps the Council achieve its plans to improve the homes of those in fuel poverty or vulnerable to the cold. The Council is publishing this Statement of Intent (SoI), on the **XX/XX/XXXX** to confirm that each of the households declared will adhere to at least one of the four available routes outlined below:

Route 1: SAP bands D-G households with an income less than £31,000. This cap applies irrespective of the property size, composition, or region.

Route 2: SAP bands E-G households that meet a combination of two of the following proxies:

<p>Proxy 1) Homes in England in Lower-layer Super Output Area 1-3 (LSOA)¹, or homes in Welsh provision LSOA 1-3 on the Welsh Index of Multiple Deprivation 2019², or the Index of Multiple Deprivation for 2020, published by the Scottish Government³</p>
<p>Proxy 2) Householders receiving a Council Tax rebate (rebates based on low income only, excludes single person rebates).</p>
<p>Proxy 3) Householders vulnerable to living in a cold home as identified in the National Institute for Health and Care Excellence (NICE) Guidance. Only one from the list can be used, excludes the proxy 'low income'.</p>
<p>Proxy 4) A householder receiving free school meals due to low-income.</p>
<p>Proxy 5) A householder supported by a LA run scheme, that has been named and described by the LA as supporting low income and vulnerable households for the purposes of NICE Guideline.</p>
<p>Proxy 6) A household referred to the LA for support by their energy supplier or Citizen's Advice or Citizen's Advice Scotland, because they have been identified as struggling to pay their electricity and gas bills.</p>

* Note proxies 1 and 3 cannot be used together.

Route 3: SAP bands D-G households that have been identified by their doctor or GP as low- income and vulnerable, with an occupant whose health conditions may be impacted further by living in a cold home. These health conditions may be cardiovascular, respiratory, immunosuppressed, or limited mobility related.

This is because the Council has identified a positive correlation between households who suffer from long-term health conditions and living off a low-income, with living in poorly insulated homes.

Route 4: SAP band D-G households that are referred under Route 4: Bespoke Targeting. Suppliers and LAs can submit an application to BEIS where they have identified a low income and vulnerable household, who are not already eligible under the exiting routes.

¹ [The English Indices of Deprivation 2019 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

² [Welsh Index of Multiple Deprivation \(full Index update with ranks\): 2019 | GOV.WALES](https://gov.wales)

³ [Scottish Index of Multiple Deprivation 2020 - gov.scot \(www.gov.scot\)](https://www.gov.scot)

Declaration and evidence check confirmation

All potentially eligible households should apply through Rugby Borough Council or one of their approved ECO installers to ensure that they can either benefit from the scheme or be assessed for eligibility under any other relevant programme.

The officer below will be responsible for checking and verifying declarations and associated evidence submitted on behalf of the local authority:

Name: XXXX XXXX

Job Title: XXXXXXXXXXXXXXXXXXXX

Telephone: XXXXX XXXXXX

Email: XXXXXX@XXXXX.gov.uk

CEO or dedicated responsible person mandatory signature

Rugby Borough Council will administer the scheme according to BEIS' ECO4 Order and will identify eligible households via Ofgem's application process. The CEO of the Council's delegated authority is given to the Chief Officer Communities and Homes to oversee the process of identifying eligible households under ECO4 Flex.

The eligibility information will be stored securely in line with the Council's data protection policy, Information Commissioner's Office Data Sharing Code, and BEIS guidance.

Signature: XXXXXX

Name: Michelle Dickson

Job Title: Chief Officer Communities and Homes

Date of signature: XX/XX/XXXX

For any general enquires relating to this Statement of Intent please email us at:
contactcentre@rugby.gov.uk

Appendix 2 - Rugby Borough Council

Climate Change and Environmental Impact Assessment

TEMPLATE - SEPTEMBER 2021

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action. Rugby Borough Council declared a climate emergency in 2019, in doing so committed to:

- To move the Council's operations towards Carbon Neutrality by 2030.
- To establish action to tackle climate change as a key driver of all decision-making.
- To provide community leadership in reducing the impact of Climate Change.
- To take action to mitigate the impact of climate change on a Borough wide basis and beyond, through adaptation.

The Council's Corporate Strategy (2021-24) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes carbon emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to the Deputy Executive Director.

If you require help, advice and support to complete the forms, please contact Dan Green, Deputy Executive Director.

SECTION 1: OVERVIEW

Portfolio and Service Area	Communities and Homes
Policy/Service/Change being assessed	Updated Statement of Intent in respect of Eco4
Is this a new or existing Policy/Service/Change?	Updating current Statement of Intent for Eco 3 which was adopted by Cabinet in June 2020
If existing policy/service please state date of last assessment	This was prior to the introduction of this template / process
Ward Specific Impacts	All
Summary of assessment Briefly summarise the policy/service/change and potential impacts.	<p>The Energy Company Obligation (ECO) is a government energy efficiency scheme administered by Ofgem.</p> <p>The Council adopted a Statement of Intent for Eco 3 in June 2020. This is a statement setting out criteria for financially vulnerable households living in less energy efficient properties to be able to access additional support from energy providers, in respect of measures to improve the thermal efficiency of their homes.</p> <p>Whilst there is no requirement to participate in publishing a Statement of Intent it does make good sense as to do so enables households to potentially access energy improvement measures via the ECO4 scheme.</p> <p>As ECO 3 has now been superseded by ECO4, which runs to March 2026, it requires an update to the Statement of Intent, should the Council wish to continue to enable qualifying households to access potential energy efficient measures in this way.</p>
Completed By	Michelle Dickson
Authorised By	Aftab Razaq
Date of Assessment	2 November 2022

SECTION 2: IMPACT ASSESSMENT

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Energy usage	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The adoption of the updated statement of intent is an opportunity to support the financially most vulnerable households, living in harder to heat homes to access potential measures to appropriately insulate and heat their homes. This will in turn reduce the incentive to use fossil fuels and wood for heating homes.</p> <p>We will need to publicise the SOIO so that people are aware of its existence.</p>	<p>There are no negative impacts.</p> <p>It should be noted that the final decisions on whether any individual household will benefit from energy saving improvements rest with obligated suppliers and their contractors. Inclusions in a Declaration of Eligibility issued by the council does not guarantee the installation of measures</p>		
Fleet usage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Sustainable Transport/Travel (customers and staff)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Community leadership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

Biodiversity and habitats	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Adaptation/Mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Impact on other providers/partners	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 3: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

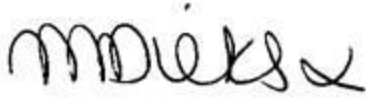
Review date	The scheme runs to 31 March 2026
Key points to be considered through review	N/a
Person responsible for review	Michelle Dickson
Authorised by	Aftab Razaq

Appendix 3 - EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published online.
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Minakshee Patel
Corporate Equality & Diversity Advisor
minakshee.patel@rugby.gov.uk
Tel: 01788 533509

Equality Impact Assessment

Service Area	Communities and Homes
Policy/Service being assessed	Rugby Borough Council EcoFlex Statement of intent 2022
Is this is a new or existing policy/service? If existing policy/service please state date of last assessment	It is a refresh of the Eco Flex statement adopted by Cabinet in 2020, to reflect the updated requirements of OFGEM and BEIS.
EqlA Review team – List of members	Michelle Dickson and Minakshee Patel
Date of this assessment	8/11/22
Signature of responsible officer (to be signed after the EqlA has been completed)	

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Advisor.

If you require help, advice and support to complete the forms, please contact Minakshee Patel, Corporate Equality & Diversity Advisor via email: minakshee.patel@rugby.gov.uk or 01788 533509

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Scoping and Defining</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	<p>The Statement of Intent (SOI) is a document that lays out the locally agreed criteria for households to receive support for EcoFlex initiatives to tackle the issues of affordable warmth.</p> <p>The EcoFlex providers can then provide measures quickly addressing the issues that have been raised removing the need for them to assess individuals.</p>
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	<p>Rugby is an environmental sustainable place to live Residents live healthy, independent lives, with the most vulnerable protected Reduce residents impact on the environment Make sure that residents have access to high quality...and environmentally sustainable homes</p>
(3) What are the expected outcomes you are hoping to achieve?	<p>The Statement of Intent will quickly allow us to identify qualifying households whose properties are currently expensive to heat and refer them to suppliers to implement a range of measures to make the property more affordable to heat and improve the health of the occupants. This will be funded through the central EcoFlex funding provided by Energy companies. The final decision on the implementation of measures is down to the supplier and not the council. We are just confirming they meet the local eligibility criteria.</p>
(4) Does or will the policy or decision affect: <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>The SOI has the potential to affect any qualifying household who falls into the agreed criteria for support under the scheme</p>
<u>Stage 2 - Information Gathering</u>	

<p>(1) What does the information tell you about those groups identified?</p>	<p>A change from the previous Eco Flex requirement is that only low income and vulnerable households are supported. This enables resource to be targeted to where it is most needed. The eligibility criteria is clearly set out in appendix 1 to the report to Cabinet.</p> <p>The adoption of the updated statement of intent is an opportunity to support the financially most vulnerable households, living in harder to heat homes to access potential measures to appropriately insulate and heat their homes.</p> <p>This will in turn reduce the incentive to use fossil fuels and wood for heating homes. Reducing energy demand in some of our most fuel poor homes will also help towards reducing carbon emissions in the Borough.</p>
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<p>n(2) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement? If yes, what were their views and how have their views influenced your decision?</p>	<p>No. The SOI is intended to support anybody who qualifies for support who fit the criteria.</p>
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<p>(3) If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>Consultation is not necessary as it is intended to impact those in most need as per the guidance set out by OFGEM.</p>
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<p><u>Stage 3 – Analysis of impact</u></p>			
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<p><u>(1)Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact</p>	<p>RACE No</p>	<p>DISABILITY No</p>	<p>GENDER No</p>
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identified for any particular group, which could amount to discrimination? If yes, identify the groups and how they are affected.	MARRIAGE/CIVIL PARTNERSHIP No	AGE No	GENDER REASSIGNMENT No
	RELIGION/BELIEF No	PREGNANCY MATERNITY No	SEXUAL ORIENTATION NO
(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how? (b) Are your proposals likely to impact on a carer who looks after older people or people with disabilities? If yes, please explain how?	The SOI will directly address the issues of affordable Warmth with criteria that targets the most vulnerable residents. A property that is affordable to heat will address not only financial issues but health issues. The qualifying criteria will open access to a range of measures in areas where there is a concentration of poorly performing properties that lack thermal efficiency and are expensive to heat. These areas in Rugby are traditionally some of the poorer areas in terms of Health and housing.		
(3) If there is an adverse impact, can this be justified?	There is no adverse impact		
(4) What actions are going to be taken to reduce or eliminate negative or adverse impact? (this should form part of your action plan under Stage 4.)	None identified		
(5) How does the strategy/service/policy contribute to the promotion of equality? If not what can be done?	The SOI uses qualifying criteria that does not have a negative impact on those from protected Characteristic Groups. The benefits are accessible and welcoming to all communities and are flexible to responding to the different needs of customers.		

(6) How does the strategy/service/policy promote good relations between groups? If not what can be done?	Once a particular resident is supported this potentially leads to other referrals in the community thus developing good relationships between different groups and communities with the common thread of a poorly performing property that is expensive to heat.
(7) Are there any obvious barriers to accessing the service? If yes how can they be overcome?	Only households meeting the criteria can be referred for energy improvement measures.

<u>Stage 4 – Action Planning, Review & Monitoring</u>	We will ask the referral agencies to monitor the applicants and summarise regularly as well as internally monitoring the geographical spread of successful applications to better understand the affordable warmth picture locally.																													
<p>If No Further Action is required then go to – Review & Monitoring</p> <p>(1) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1" data-bbox="873 869 2116 1101"> <thead> <tr> <th data-bbox="873 869 1120 949">Action</th> <th data-bbox="1120 869 1366 949">Lead Officer</th> <th data-bbox="1366 869 1612 949">Date for completion</th> <th data-bbox="1612 869 1859 949">Resource requirements</th> <th data-bbox="1859 869 2116 949">Comments</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
(2) Review and Monitoring State how and when you will monitor policy and Action Plan																														

Please annotate your policy with the following statement:



'An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).'

AGENDA MANAGEMENT SHEET

Report Title: Stray Dog Policy and Procedures

Name of Committee: Cabinet

Date of Meeting: 5 December 2022

Report Director: Chief Officer - Regulation and Safety

Portfolio: Regulation and Safety

Ward Relevance: All

Prior Consultation: All internal consultees

Contact Officer: Henry Biddington Regulation and Safety Manager
533607 henry.biddington@rugby.gov.uk

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C)
 Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E)
 Residents live healthy, independent lives, with the most vulnerable protected. (HC)
 Rugby Borough Council is a responsible, effective and efficient organisation. (O)
[Corporate Strategy 2021-2024](#)
 This report does not specifically relate to any Council priorities but

Summary: The purpose of the report is to seek approval of the Stray Dog Policy and Procedures which sets out how RBC responds and actions stray dogs reported in the Borough and meet statutory duties.

Financial Implications: There are costs incurred to RBC where dog owners are not identified, for which there is an existing budget. However, identified owners are

charged and issued Fixed Penalty Notice as part of cost recovery.

Risk Management/Health and Safety Implications:	Risk to staff undertaking seizure of stray dogs from bite injuries etc. All officers are appropriately trained and there is a Risk Assessment in place
Environmental Implications:	No adverse impact, see EIA attached
Legal Implications:	The Council has a duty under Environmental Protection Act 1990 section 149 in relation to seizure of stray dogs and this policy sets out how the Council will discharge these duties
Equality and Diversity:	No adverse impact see attached EqIA
Options:	1) To approve the Policy 2) Not to approve the policy
Recommendation:	The Stray Dog Policy as at Appendix 1 to the report be approved.
Reasons for Recommendation:	To ensure that RBC has a framework to deliver statutory functions regarding stray dogs.

Cabinet - 5 December 2022

Stray Dog Policy and Procedures

Public Report of the Chief Officer - Regulation and Safety

Recommendation

The Stray Dog Policy as at Appendix 1 to the report be approved.

1.0 Introduction

1.1 The Purpose of this report is to request that Cabinet approves the Stray Dog Policy and Procedures.

1.2 The Stray Dog Policy and Procedures sets out how the Council meets its statutory function in regard to dealing with stray dogs

2.0 Background and Information

2.2 The Environmental Protection Act 1990 section 149 sets out the legislative duties of the Council on the seizure of stray dogs. The Stray Dog Policy and Procedures formally sets out how the Council discharges these duties.

2.3 The Policy covers responsibilities and the delegation of these responsibilities where necessary to outside contractors. It also covers how and when stray dogs are identified, seized and kept and includes how costs are to be recovered from owners where they are identified.

2.4 With the increase in cost of living it is possible that there will be an increase in abandoned and stray dogs and it is important that the Council has a set policy to act upon this.

2.5 The policy helps delivery outcome 3 Health and Communities of the Corporate strategy by helping keep communities safe by removing stray dogs from the streets and green spaces.

Name of Meeting: Cabinet
Date of Meeting: 5 December 2022
Subject Matter: Stray Dog Policy and Procedure
Originating Department: Regulation and Safety

DO ANY BACKGROUND PAPERS APPLY **YES** **NO**

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
1	Stray Dog Policy and Procedures

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A



Stray dog Policy and Procedures

September 2022

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1. Foreword and legal duties

1.1 The Council has a duty under s.149 (1) of the Environmental Protection (Stray Dogs) Regulations 1992 to appoint an officer, 'for the purpose of discharging the functions of dealing with stray secured dogs found in the area of the authority'. This is the Chief Officer for Regulation and Safety who has delegated this Duty to the Community Wardens service. Rugby Borough Council (from now on referred to as the Council) currently employs a team of community wardens who carry out the duties of 'dog warden' and are trained in the handling and welfare of stray dogs. The Council also employs other officers who hold relevant animal licensing and animal welfare qualifications. This provides full cover for holidays and sickness, allowing the Council to operate an out of hours stray dog service, therefore fulfilling its statutory duties.

1.2 The aim of this policy is to put in place a system for the Council to carry out its statutory duties.

1.3 Under the required legislation if a dog is identified as roaming and unattended in a public place it is deemed to be a 'stray' and the dog warden may seize and detain it.

1.4 The Council aims to ensure the safety and welfare of all seized stray secured dogs whilst in its care, including during transportation.

2. Rugby Borough Council Stray Secured Dog Collection Procedures

2.1 If a member of the public finds a stray dog in a public place and secures it or takes it home, they are required to contact the Council and arrange for a community warden to come and pick the dog up. They should call 0800 096 8800 between the hours of 8am and 9pm, 7 days a week to make the necessary arrangements. Dogs will be collected from members of the public and vets until 9pm, seven days a week including bank holidays. The following days however are excluded: Christmas Eve, Christmas Day, Boxing Day, New Year's Eve and New Year's Day. If a stray dog is identified and secured by a member of the public on these days, it can be taken to a veterinary practice for collection. The community wardens will collect the dog on their next working day.

2.2 Alternatively, if a finder calls to report a stray secure dog and the finder is willing to take it to our holding kennels a password will be given as proof that the dog has been reported to the Council prior to delivery to Dunsmore Kennels, Stave Hall Farm Kennels, Fosse Way, Monks Kirby CV23 0RL. The member of the public will need to call the kennels on 024 7654 2566 to advise they are bringing a stray dog in prior to dropping it off.

2.3 The officer receiving the dog must record the finder details and the location of where the dog was found in the finders' register. This must also include the date, time and description of the dog. The purpose of the finders' register is to prevent abandonment by owners. These details will also form part of a statement of witness under (CJ.Act 1967, Sec.9; MC.Act 1980, SSA (3) (a) and 5B, M.C Rules 1981, Reg.70) if the finder is required to act as a witness in court.

2.4 If a stray dog has been taken to a veterinary practice in Rugby borough by a member of the public, the vet is required to obtain the details of the member of the public who brought the dog in and fill out the same finder form as used by the Council. The vet then contacts the Council for the dog to be collected.

2.5 All personal data is managed in accordance with the Data Protection Act 2018 and the General Data Protection Regulation 2018.

3. Seizure of stray secure dogs

3.1 The Environmental Protection (Stray Dogs) Regulations 1992, section 149 specifies that a stray dog which has been secured is required to be detained and a notice of seizure served upon the owner (where known).

3.2 On the first occasion that a dog is seized the community warden will make all reasonable efforts to identify the owner and return it to them before taking it to kennels. A dog will only be returned to an address if there is someone able to receive it. The dog will not be left at an unoccupied property, for example should the owner be out.

The community wardens carry a scanning device to identify dogs fitted with a microchip as required by The Microchipping of Dogs (England) Regulations 2015. If owner details are held on the microchip, the community warden will visit or telephone as appropriate and the dog will be returned to the owner. This is considered better for the welfare of the dog and is less cost to the owner. If a stray dog is identified as an assistance dog additional efforts will be made to return the dog to the owner before being taken to kennels.

3.3 If the dog is found straying in a public space that is a designated dog on lead area under the Council's Public Space Protection Order (made under the Anti-social Behaviour, Crime and Policing Act 2014) the owner will receive a fixed penalty notice. Under the Order it is an offence for a dog to be off lead on any land that is covered by the Public Space Protection Order. The fixed penalty is paid by contacting Rugby Borough Council (see Table 1, page 8 for fees)

If the dog owner refuses to accept the fixed penalty the dog cannot be returned to them. Instead, the dog is taken to Dunsmore kennels which carries kennelling costs, fees and charges (outlined in table 1). Should the dog not be claimed, or the owner declines to pay the outstanding sums, the ownership of the dog is legally transferred to the Council after seven clear days. The Council is then entitled to re-home or sell the dog. In extreme cases, if the dog has severe health problems and on veterinary advice it may be humanely destroyed.

3.4 If a dog is seized for a second time it will automatically be taken directly to kennels, thus incurring kennelling costs as well as fees and charges.

3.5 If the community warden determines that a dog needs veterinary treatment, appropriate arrangements will be made for it to receive treatment up to a maximum cost of £150. This may be before taking the dog to kennels or returning it to the owners who will be liable for any expenses incurred. If over £150 a manager in Regulation and Safety will be consulted regarding the best outcome for the animal.

3.6 While the dog is in care of the Council, or its allocated kennelling establishment, every effort will be taken to ensure that the five welfare needs defined under Section 9 of the Animal Welfare Act 2006 are met:

- Need for a suitable environment
- Need for a suitable diet

- Need to be able to exhibit normal behaviour patterns
- Need to be housed with or apart from other animals
- Need to be protected from pain, suffering, injury and disease

3.7 With regard to dangerous dogs, where it appears to the community warden that a dog collected as a stray is a banned breed (Pit Bull type, Dogo Argentino, Japanese Tosa, Fila Brasileiro) and the dog is aggressive, the police should be contacted on 101 at the earliest opportunity. The police do have the responsibility and as such have dog legislation officers to deal with such situations. Further, the police must be contacted to detain the dog for the safety of the community wardens as outlined in the Stray Dog Risk Assessment.

4. Administrative Boundaries

4.1 Where a dog is found in a neighbouring authority outside of Rugby Borough Council's boundary and the person who finds the dog takes the dog to within Rugby Borough Council's boundary it will be the responsibility of the neighbouring authority to collect the dog.

4.2 If a dog is found within the boundary of Rugby Borough Council and is removed to a neighbouring authority it will be the responsibility of Rugby Borough Council to collect the dog. Where possible it will be agreed to meet at the Rugby Borough boundary to collect the stray dog from the person who found it.

5. Microchipping of dogs (England) Regulations 2015 Section 12(a)

5.1 Since 6 April 2016, it is compulsory for owners to ensure their dog (once it is over the age of 8 weeks) is microchipped and their details are kept up to date.

5.2 Exemptions for dogs having a microchip are: -

- Dog imported into the UK within 30 days
- Working dog i.e., Police or farm dog
- Owner holds an exemption certificate issued by a veterinarian surgeon.

5.3 Owners that require microchipping advice can contact the community wardens, the Council's contact centre or look on the Council's website rugby.gov.uk for further information.

5.4 If a stray secure dog is scanned and no microchip is found or owner details are incorrect, but an owner has been identified, a notice under the microchipping of dogs (England) Regulations 2015 Section 12(a) will be served on the owner requiring them to get the dog microchipped/update details within 21 days. Evidence must be provided to the Council to demonstrate notice compliance. Failure to comply with this notice may lead to prosecution.

5.5 All dogs are required when in a public place to be fitted with a collar and tag bearing contact owner details.

5.6 All dogs without a microchip or incorrect details will be housed at the Council's contracted kennels, currently Stave Hall Farm Kennels, Fosse Way, Monks Kirby CV23 0RL.

6. Owner claiming stray dog

6.1 It is the responsibility of the dog owner to visit the kennels to recover their dog. Detained stray dogs will not be released by the kennels until all costs incurred are paid in full included any veterinary costs if applicable.

6.2 Proof of ownership must be shown before the dog will be released, such as photos of the dog with its owner, vet documents or microchip details/documents.

7. Unclaimed Stray dogs

7.1 Unclaimed stray dogs are held for a minimum period of seven clear days following seizure. After this period, ownership of the dog reverts to the Council. Section 149(6) of the Environmental Protection (Stray Dogs) Regulations 1992 entitles the Council to deal with unclaimed stray dogs in one of three ways:

- By selling it or giving it to a person who will, in their opinion, care properly for the dog
- By selling it or giving it to an establishment for the reception of stray dogs
- By destroying it in a manner to cause as little pain as possible. The advice of a vet will be sought before making this decision. No dog shall be sold or given for the purposes of vivisection.

7.2 Once seven clear days have passed from seizure all stray dogs are transferred to a rehoming centre.

7.3 Once transferred to the Council or re-homed to a new owner, the former owner of a stray dog has no legal claim for the return of the animal.

8. Stray dog release fees

8.1 The Council currently insists on the full amount (statutory fee, handling fees, kennelling fees, plus any veterinary costs incurred to be paid at the kennels) when collecting the dog before the dog will be released.

Table 1: Our fees (subject to change) or visit www.rugby.gov.uk and search fees and charges

	First Offence	Second offence
Untagged or no microchip/details incorrect	£70 + £25 + kennel charge of £14.40 per day (including part days) + any vet costs	£80 + £25 + kennel charge of £14.40 per day (including part days) + any vet costs
Tagged or microchipped/correct details	£45 +£25 + kennel charge of £14.40 per day (including part days) + any vet costs	£65 +£25 + kennel charge of £14.40 per day (including part days) + any vet costs
Fixed Penalty Notice	£50 if paid within 10 days.	£100 if paid within 14 days –non-payment may result in prosecution

9. Record Keeping

9.1 The Council has a duty under The Environmental Protection (Stray Dogs) Regulations 1992 section 149 (3) to keep a record of seized dogs. The record should include: - a) a brief description of each dog, including the breed (if known), and any distinctive physical characteristics or markings, tattoos or scars; b) any information which is recorded on a tag or collar worn by, or which is otherwise carried by the dog; c) the date, time and place of the seizure which is protected by GDPR and DPA.

10. Council Contracted Kennels

10.1 The Council uses a contractor to provide kennel services, currently Stave Hall Farm Kennels, Fosse Way, Monks Kirby CV23 0RL.

10.2 On occasion the contractor will be required to take charge and effectively seize a dog direct from a finder.

10.3 Stray dogs delivered by members of the public to the Council's contracted kennels, must use an agreed 'acceptance point'. The acceptance point will be agreed between the Council and contractor.

10.4 For the purposes of this contract 'acceptance point' means an easily accessible safe and secure reception point at which members of the public can leave dogs with a trained member of the contractor's staff. A member of staff at the acceptance point will be expected to undertake the safe custody and care of said animals.

10.5 Upon arrival of the animal the contractor is to examine the stray dog for any illness/disease and any forms of identification commonly used, including electronic chip, tattoo.

10.6 Where an owner is identifiable the contractor must contact them without delay to advise the dog has been taken to kennels.

10.7 The contractor is expected to treat or arrange for treatment of any dogs that are injured or require treatment to keep them alive, unless the cost of doing so is excessive or if the dog's condition is such that it would be more humane to provide euthanasia. The contractor must contact the Council immediately for any cases requiring treatment.

10.8 The contractor will be expected to complete the provided dog registration documentation and collect any applicable fees before returning a dog to an owner.

10.9 Where a dog is taken to the kennels by a member of the public the contractor must ensure it promptly notifies the Council within one hour.

10.10 The contractor is to receive stray dogs as above and undertake the safe custody and care of said animals until they are released or re-homed, ensuring their welfare needs are met.

10.11 Contracted kennels are expected to take queries from members of the public looking for their lost dog. The kennels act as agents for the Council in the collection of costs and charges imposed on persons reclaiming seized dogs.

10.12 The contractor must detain for seven clear days any dogs seized or brought to them, except where the rightful owner comes forward to claim a dog or longer if the Council instructs otherwise.

10.13 All relevant statutory and non-statutory guidance and good practice relating to the welfare of dogs is to be followed.

10.14 The contractor shall provide all necessary food, water, equipment, bedding and veterinary treatment necessary to maintain the dogs under their care are in reasonably good health and condition.

10.15 For dogs that are ill or injured whilst in the care of the contractor, the contractor is expected to treat or arrange for treatment, unless the cost of doing so is excessive or if the dog's condition is such that it would be more humane to provide euthanasia.

10.16 The contractor will be expected to contact the Council immediately for any cases requiring treatment.

10.17 Where there is an emergency case and all avenues of contact have been exhausted the contractor will be expected to make a judgment based on theirs and a vet's opinion. A report from the vet will be required.

10.18 The contractor must specify arrangements for busy periods and for when capacity is exceeded.

10.19 Contractors must confirm their opening hours for the public to collect dogs. The kennels must be open for the public to reclaim their dog for a minimum of four hours Monday-Saturday and two hours on a Sunday and bank holiday (Christmas day, Boxing Day and Easter Sunday exceptions allowed).

10.20 The contractor shall arrange for the re-uniting of the dog with its rightful owner.

10.21 Prior to the release of the dog, the contractor is to validate the identity of the owner and take a copy of proof of identity.

10.22 The contractor shall calculate and collect the correct fees from the owner.

10.23 Receipts are to be issued to the person collecting the dog. The contractor is required to keep full records of those collecting dogs.

10.24 Procedures must be put in place that prevent an owner or person collecting a dog from identifying a finder.

10.25 If the dog is believed to be dangerous or a banned breed the contractor must notify the Council immediately so appropriate arrangements for checks can be made.

10.26 Unless otherwise instructed by the Council the contractor shall assume responsibility for dogs not claimed at the end of the seventh full day statutory detention period.

10.27 The contractor shall make every effort to re-home or sell unwanted dogs, unless they are believed to be aggressive or dangerous.

10.28 The contractor must make every effort to ensure and check a dog is not rehomed with the person that has allowed it to stray. If dogs are returned to original

owners and it is found to be a contravention of this contract, formal action may be taken against the kennels.

10.29 Banned breeds cannot be re-homed.

10.30 Euthanasia should only be considered after all other avenues have been explored to save the dog by re-homing. Euthanasia must only be enacted by a veterinary surgeon and in a manner causing as little pain and suffering to the dog as possible.

10.31 No dog shall be sold or given for the purposes of animal experimentation.

10.32 No dog shall be sold or rehomed before the minimum statutory seven-day period.

10.33 In the event that humane destruction and disposal of the dog becomes necessary, the contractor shall arrange for the dog to be destroyed humanely and in such a manner as to cause as little pain and distress as possible. The contractor shall also make the appropriate arrangements for the disposal of the body of any deceased dog. Details of those arrangements must be provided within the application.

10.34 The contractor or their representative is to make evidenced assessments and/or visits to the homes of proposed owners to assess their suitability for the safe keeping of a dog. The assessment should include the ability of the proposed owner to handle and care for the dog given its previous history and/or temperament.

10.35 The contractor or their representative is to keep written records of each assessment when the dog passes into new ownership.

10.36 The contractor must not keep a stray dog for the statutory seven clear days and then return it to the owner without payment of kennelling costs and associated fees. If it is found to be a contravention of this contract, formal action may be taken against the kennels.

10.37 The contractor must be able to make available for inspection copies of records relating to any of the above. In addition, the contractor must maintain accurate records and accounts. The Council will provide its own paperwork which must be completed as requested.

10.38 The contractor will be requested to submit monthly records.

Rugby Borough Council

Climate Change and Environmental Impact Assessment

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action. Rugby Borough Council declared a climate emergency in 2019, in doing so committed to:

- To move the Council's operations towards Carbon Neutrality by 2030.
- To establish action to tackle climate change as a key driver of all decision-making.
- To provide community leadership in reducing the impact of Climate Change.
- To take action to mitigate the impact of climate change on a Borough wide basis and beyond, through adaptation.

The Council's Corporate Strategy (2021-24) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes carbon emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to the Deputy Executive Director.

If you require help, advice and support to complete the forms, please contact Dan Green, Deputy Executive Director.

SECTION 1: OVERVIEW

Portfolio and Service Area	Regulation and Safety Environmental Health and Community Safety
Policy/Service/Change being assessed	Stray Dog Policy
Is this a new or existing Policy/Service/Change?	New Policy
If existing policy/service please state date of last assessment	No previous requirement for an EIA
Ward Specific Impacts	All Wards
Summary of assessment Briefly summarise the policy/service/change and potential impacts.	<p>The Environmental Protection Act 1990 section 149 sets out the legislative duties of the Council on the seizure of stray dogs. The Stray Dog Policy and Procedures formally sets out how the Council discharges these duties.</p> <p>The Policy covers responsibilities and the delegation of these responsibilities where necessary to outside contractors. It also covers how and when stray dogs are identified, seized and kept and includes how costs are to be recovered from owners where they are identified.</p>
Completed By	Henry Biddington
Authorised By	David Burrows
Date of Assessment	6.9.22

SECTION 2: IMPACT ASSESSMENT

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Energy usage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Fleet usage	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Fuel used in vans to transport dogs to and from kennels and returning dogs to owners	Ongoing review of fleet to identify cleaner vehicle use		
Sustainable Transport/Travel (customers and staff)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Community leadership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Biodiversity and habitats	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Adaptation/Mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Impact on other providers/partners	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 3: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	
Key points to be considered through review	
Person responsible for review	
Authorised by	

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published online.
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Minakshee Patel
Corporate Equality & Diversity Advisor
minakshee.patel@rugby.gov.uk
Tel: 01788 533509

Equality Impact Assessment

Service Area	Regulation and Safety
Policy/Service being assessed	Stray Dog Policy
Is this is a new or existing policy/service? If existing policy/service please state date of last assessment	New
EqlA Review team – List of members	Henry Biddington
Date of this assessment	6.9.22
Signature of responsible officer (to be signed after the EqlA has been completed)	

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Advisor.

If you require help, advice and support to complete the forms, please contact Minakshee Patel, Corporate Equality & Diversity Advisor via email: minakshee.patel@rugby.gov.uk or 01788 533509

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Scoping and Defining</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	<p>The Environmental Protection Act 1990 section 149 sets out the legislative duties of the Council on the seizure of stray dogs. The Stray Dog Policy and Procedures formally sets out how the Council discharges these duties.</p> <p>The Policy covers responsibilities and the delegation of these responsibilities where necessary to outside contractors. It also covers how and when stray dogs are identified, seized and kept and includes how costs are to be recovered from owners where they are identified.</p>
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	<p>Health and Communities</p> <p>Make sure that our communities are safe.</p> <p>Make sure that residents are proud of their community and their borough.</p>
(3) What are the expected outcomes you are hoping to achieve?	<p>To ensure that the Council has a set policy to discharges its duties in relation to stray dogs.</p>
(4) Does or will the policy or decision affect: <ul style="list-style-type: none">• Customers• Employees• Wider community or groups	<p>All</p>
<u>Stage 2 - Information Gathering</u>	
	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, eg service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>

(1) What does the information tell you about those groups identified?	no specific groups with specific protected characteristics identified as being adversely affected. Assistance dogs would be returned to owners if identified before taking to kennels		
(2) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement? If yes, what were their views and how have their views influenced your decision?			
(3) If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.	N/A		
<u>Stage 3 – Analysis of impact</u>			
<p><u>(1)Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	RACE	DISABILITY Assistance dogs would not be seized unless owner could not be identified.	GENDER
	MARRIAGE/CIVIL PARTNERSHIP	AGE	GENDER REASSIGNMENT
	RELIGION/BELIEF	PREGNANCY MATERNITY	SEXUAL ORIENTATION

<p><u>(2) Cross cutting themes</u></p> <p>(a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?</p> <p>(b) Are your proposals likely to impact on a carer who looks after older people or people with disabilities? If yes, please explain how?</p>	<p>a) No</p> <p>b) No</p>
<p>(3) If there is an adverse impact, can this be justified?</p>	<p>N/A</p>
<p>(4) What actions are going to be taken to reduce or eliminate negative or adverse impact? (this should form part of your action plan under Stage 4.)</p>	<p>N/A</p>
<p>(5) How does the strategy/service/policy contribute to the promotion of equality? If not what can be done?</p>	<p>Look at ensuring information on Website is accessible to all</p>
<p>(6) How does the strategy/service/policy promote good relations between groups? If not what can be done?</p>	<p>Ensure assistance dogs are returned to owner where possible</p>
<p>(7) Are there any obvious barriers to accessing the service? If yes how can they be overcome?</p>	<p>See answer 5</p>

<u>Stage 4 – Action Planning, Review & Monitoring</u>																														
<p>If No Further Action is required then go to – Review & Monitoring</p> <p>(1) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1" data-bbox="875 464 2112 692"> <thead> <tr> <th data-bbox="875 464 1120 539">Action</th> <th data-bbox="1120 464 1364 539">Lead Officer</th> <th data-bbox="1364 464 1615 539">Date for completion</th> <th data-bbox="1615 464 1865 539">Resource requirements</th> <th data-bbox="1865 464 2112 539">Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="875 539 1120 576"></td> <td data-bbox="1120 539 1364 576"></td> <td data-bbox="1364 539 1615 576"></td> <td data-bbox="1615 539 1865 576"></td> <td data-bbox="1865 539 2112 576"></td> </tr> <tr> <td data-bbox="875 576 1120 612"></td> <td data-bbox="1120 576 1364 612"></td> <td data-bbox="1364 576 1615 612"></td> <td data-bbox="1615 576 1865 612"></td> <td data-bbox="1865 576 2112 612"></td> </tr> <tr> <td data-bbox="875 612 1120 649"></td> <td data-bbox="1120 612 1364 649"></td> <td data-bbox="1364 612 1615 649"></td> <td data-bbox="1615 612 1865 649"></td> <td data-bbox="1865 612 2112 649"></td> </tr> <tr> <td data-bbox="875 649 1120 692"></td> <td data-bbox="1120 649 1364 692"></td> <td data-bbox="1364 649 1615 692"></td> <td data-bbox="1615 649 1865 692"></td> <td data-bbox="1865 649 2112 692"></td> </tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(2) Review and Monitoring State how and when you will monitor policy and Action Plan</p>	<p>Ongoing monitoring of communications and infrastructure changes</p>																													

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on 6.9.2022’

Agenda No 14

AGENDA MANAGEMENT SHEET

Report Title: Safer Streets 4 Grant Funding

Name of Committee: Cabinet

Date of Meeting: 5 December 2022

Report Director: Chief Officer - Regulation and Safety

Portfolio: Regulation and Safety

Ward Relevance: Eastlands

Prior Consultation: Internal consultaion

Contact Officer: Henry Biddington Regulation and Safety Manager
533607 henry.biddington@rugby.gov.uk

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):

(C) Climate Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents.

(E) Economy

(HC) Health and Communities Residents live healthy, independent lives, with the most vulnerable protected. (HC)

(O) Organisation [Corporate Strategy 2021-2024](#)

Summary: A joint grant fund bid with Warwickshire County Council and the Office of Police and Crime Commissioner and Rugby Borough Council was submitted to the Home Office for funding from the Safer Streets 4 initiative. The bid was successful and the Rugby section of the project covers additional CCTV cameras and upgrades and improved lighting around St Andrews Church and Trinity Graveyard.

Financial Implications: A capital budget of £49,500 is requested for 22/23 to be funded from Safer Streets grant income

Risk Management/Health and Safety Implications: Risk associated with delay in project delivery meaning part or all of the funding may have to be returned..

Environmental Implications: None see EIA Appendix 2

Legal Implications:

Equality and Diversity: Positive impact with regard to street safety for women See Appendix 3

Options:

- A) Rugby Borough Council entering into a funding agreement with Office of Police and Crime Commissioner to ensure the Safer Streets grant funding can spent be approved
- B) A capital budget of £49,500 for 2021/22 and 22/23 for upgrading of CCTV cameras and lighting be approved

Or

- A) Rugby Borough Council entering into a funding agreement with Office of Police and Crime Commissioner to ensure the Safer Streets grant funding can spent not be approved
- B) A capital budget of £49,500 for 2021/22 and 22/23 for upgrading of CCTV cameras and lighting not be approved

Recommendation:

- (1) This Council enters into a funding agreement with Office of Police and Crime Commissioner to ensure the Safer Streets grant funding can be spent; and
- (2) a capital budget of £49,500 for 2021/22 and 2022/23 for upgrading of CCTV cameras and lighting be approved.

Reasons for Recommendation: To improve the safety of residents in Rugby in the Town Centre

Cabinet - 5 December 2022

Safer Streets 4 Funding

Public Report of the Chief Officer - Regulation and Safety

Recommendation

- (1) This Council enters into a funding agreement with Office of Police and Crime Commissioner to ensure the Safer Streets grant funding can be spent; and
- (2) a capital budget of £49,500 for 2021/22 and 2022/23 for upgrading of CCTV cameras and lighting be approved.

1.0 Introduction

1.1 Rugby Borough Council (RBC) submitted a joint funding bid with Warwickshire County Council and the Police and Crime Commissioner's Office for funding from Home Office for Safer Streets 4.

1.2 Rugby Borough Council has been awarded £49,500 to complete environmental improvements to the area around St Andrew's Church and Holy Trinity Graveyard to improve public safety. See appendix 1 Grant offer letter

1.3 The purpose of this report is for Cabinet to approve RBC enter into the grant funding agreement and create the capital budget required

2.0 Background

2.1 The Rugby Community Safety Partnership has identified the area around St Andrew's Church, Church Walk and the Holy Trinity Graveyard as an area that attracts criminal activity, is a hotspot for anti-social behaviour (ASB) and there is a fear of crime and a perception that it is an unsafe area to go. Evidence has been gathered from safe street survey, RBC violence against women and girls survey and conversations with local police officers and elected members.

2.2 The area currently has some CCTV which is linked into the Control Centre operated by Rugby First. There are however some areas that the cameras do not cover or views are restricted by overhanging branches etc. There is also poor coverage of Trinity Graveyard and the walkway that leads to from Church Street alongside the graveyard.

2.3 There are lighting columns but these are obscured by branches and there are insufficient numbers to provide good and effective lighting of the walkways.

3.0 Funding Bid

3.1 Safer Street Funding is provided by the Home Office and available to all local Authorities. The bids are considered by the Office of Police and Crime Commissioner before they are finalised and submitted to the Home Office for approval. The Warwickshire bid was done through partnership with other District and Boroughs to maximise the likelihood of having a successful bid. Safer Streets funding is provided to reduce crime and improve the perception/fear of crime in a particular area.

3.2 There are two main areas of where the grant fund money will be spent.

3.3 The first is around CCTV. There will be an additional CCTV camera installed at the entrance of Holy Trinity Graveyard on Church Street. This will provide additional visibility of the Graveyard and walk way between church street and St Andrews Church. The grant fund includes an upgrade to the current lighting column to ensure that it is capable of furnishing the new camera. The camera will be linked into the current CCTV network which is managed by Rugby First. A second camera on Church Street will be upgraded to provide additional coverage of Trinity Graveyard.

3.4 The second area of spending will occur around lighting. All the lighting in the area will be upgraded to LED lighting and there will be an upgrade to columns to increase the area that are lit up.

3.5 In addition Rugby Borough Council will be working with the owners of the unused buildings to ensure that trees and foliage are cut back to maximise the benefit and coverage of current lighting and CCTV cameras.

3.6 The funding links into the following priorities of the corporate strategy deliver plan:

- Economy: "Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents"
- By improving safety and reducing crime and the fear of crime in the focused area residents will feel safer when visiting the Town Centre and are more likely to utilise local businesses.
- Health and wellbeing: "Residents live healthy, independent lives, with the most vulnerable protected"
- By improving safety and wellbeing and reducing the fear of crime we are addressing outcome 3h to Make sure our communities are safe and this project also feeds into actions within the Town Centre Action Plan and strategic aims of Rugby Community Safety Partnership.

3.7 The first part of the grant fund money needs to be spent by end of March 2023 and the second part by the end of 2023. Any unspent grant fund money at this point would be returned to the OPPC. Once the lighting and upgrades to lighting have been completed Warwickshire County Council will take ownership for ongoing maintenance as the lighting already falls under their remit. Once the CCTV cameras are upgraded and the additional camera is installed Rugby First will bring them into

the current CCTV network. Repair, maintenance, upgrade and replacement responsibilities will be dealt with as part of the wider Rugby First relationship.

3.8 The delivery of the project and use of the grant fund money is dependent on working with our partners. Warwickshire County Council have agreed to install the lighting elements of the project however if agreements can not be met as part of our wider Rugby First relationship with regards to the installation of CCTV then this part of the grant fund money may have to be returned.

4.0 Conclusion

4.1 The Safer Streets 4 Grant funding will improve public safety in our Town Centre at a location that has been highlighted as a problem. In addition will help with a public perception that this area is unsafe to walk in and support objectives of reducing incidents of violence against women and girls which links into the corporate strategy as per paragraph 3.6

Name of Meeting: Cabinet
Date of Meeting: 5 December 2022
Subject Matter: Safer Streets 4 Grant Funding
Originating Department: Regulation and Safety

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Date: 14 November 2022

Dear Grant Recipient,

Home Office Safer Street Fund 4

I am pleased to offer you a grant from the above fund as set out below. The offer is for a grant totalling **£49,500** for the period 1st April 2022 to 31st March 2024. This funding is subject to compliance with the attached terms and conditions, the grant agreement issued by the Home Office, and in line with your agreed application for funding. Please note these terms and conditions cover the funding period 2022-23 and 2023-24.

Grant Offer 2022-2023

OPCC Ref Number:	22-23_SSFR4_07	
Initiative (for which this grant is paid)	Safer Street Fund Round 4	
Amount (2022-23):	£34,500	
Grant to be paid to:	Rugby Borough Council	
Funding period:	Start Date: July 2022	End Date: 31 st March 2023
Additional conditions (if any)	<p>All conditions for the Home Office grant funding must also be complied with. These are set out in the Grant Agreement, Schedule 2 and Schedule 3 of the Grant Agreement and Grant Claim Form (Annex A). Signing of the terms and conditions is acceptance that the costs incurred do not receive any duplicate funding.</p> <ul style="list-style-type: none"> - To adhere to requirements and guidelines laid out in the Home Office Grant Agreement with the Warwickshire Office of the Police and Crime Commissioner - To provide funding reports as per requirements of the Home Office. - To return any and all unspent funds to the OPCC for this funding period by 31st March 2023 	
Purpose of the grant	To address the intelligence, risk and concerns associated with open spaces and recreation grounds, a partnership multi-	

Office of the Police and Crime Commissioner, 3 Northgate Street, Warwick, CV34 4SP

✉ opcc@warwickshire.pnn.police.uk ☎ 01926 733523

🌐 www.warwickshire-pcc.gov.uk 🐦 @WarwickshirePCC 📘 WarwickshirePCC



	location approach will be taken in four key locations to reduce crime, ASB and fear of crime and increase feelings of safety especially for women and girls. The programme will work with communities to identify and deliver solutions.																
Reason for the grant offer	<p>St Andrews Church, Rugby: installation/ upgrading of CCTV cameras, additional/ improved lighting, removal of foliage and hide outs to increase natural surveillance.</p> <table border="1"> <tr> <td>Additional lighting columns (4)</td> <td>Rugby</td> <td>£</td> <td>20,000</td> </tr> <tr> <td>New LED lanterns (10)</td> <td>Rugby</td> <td>£</td> <td>4,500</td> </tr> <tr> <td>CCTV linked to control room- 2 x upgrades</td> <td>Rugby</td> <td>£</td> <td>10,000</td> </tr> <tr> <td>Rugby Total</td> <td></td> <td>£</td> <td>34,500</td> </tr> </table>	Additional lighting columns (4)	Rugby	£	20,000	New LED lanterns (10)	Rugby	£	4,500	CCTV linked to control room- 2 x upgrades	Rugby	£	10,000	Rugby Total		£	34,500
Additional lighting columns (4)	Rugby	£	20,000														
New LED lanterns (10)	Rugby	£	4,500														
CCTV linked to control room- 2 x upgrades	Rugby	£	10,000														
Rugby Total		£	34,500														
Payment schedule	October 2022: One payment made in full																
Reports required	Financial and performance reports must be completed and submitted to the PCC/Home Office to meet the requirements set out in the grants agreement with particular note to the Annex A- Grant Claim Form.																

Grant Offer 2023-2024

OPCC Ref Number:	23-24_SSFR4_08	
Initiative (for which this grant is paid)	Safer Street Fund Round 4	
Amount (2023-24):	£15,000	
Grant to be paid to:	Rugby Borough Council	
Funding period:	Start Date: April 2022	End Date: September 2023



<p>Additional conditions (if any)</p>	<p>All conditions for the Home Office grant funding must also be complied with. These are set out in the Grant Agreement, Schedule 2 and Schedule 3 of the Grant Agreement and Grant Claim Form (Annex A). Signing of the terms and conditions is acceptance that the costs incurred do not receive any duplicate funding.</p> <ul style="list-style-type: none"> - To adhere to requirements and guidelines laid out in the Home Office Grant Agreement with the Warwickshire Office of the Police and Crime Commissioner - To provide funding reports as per requirements of the Home Office. - To return any and all unspent funds to the OPCC for this funding period by 31st March 2024 						
<p>Purpose of the grant</p>	<p>To address the intelligence, risk and concerns associated with open spaces and recreation grounds, a partnership multi-location approach will be taken in four key locations to reduce crime, ASB and fear of crime and increase feelings of safety especially for women and girls. The programme will work with communities to identify and deliver solutions.</p>						
<p>Reason for the grant offer</p>	<p>St Andrews Church, Rugby: installation/ upgrading of CCTV cameras, additional/ improved lighting, removal of foliage and hide outs to increase natural surveillance.</p> <table border="1" data-bbox="529 1318 1419 1493"> <tr> <td data-bbox="529 1318 883 1423">CCTV - new linked to control room (1 camera)</td> <td data-bbox="889 1318 1084 1423">Rugby</td> <td data-bbox="1091 1318 1419 1423">£ 15,000</td> </tr> <tr> <td data-bbox="529 1432 883 1493">Rugby Total</td> <td data-bbox="889 1432 1084 1493"></td> <td data-bbox="1091 1432 1419 1493">£ 15,000</td> </tr> </table>	CCTV - new linked to control room (1 camera)	Rugby	£ 15,000	Rugby Total		£ 15,000
CCTV - new linked to control room (1 camera)	Rugby	£ 15,000					
Rugby Total		£ 15,000					
<p>Payment schedule</p>	<p>April 2023: One payment made in full</p>						
<p>Reports required</p>	<p>Financial and performance reports must be completed and submitted to the PCC/Home Office to meet the requirements set out in the grants agreement with particular note to the Annex A- Grant Claim Form.</p>						

To accept the above grant offer, please complete and return a signed copy of the attached terms and conditions and acceptance form within 28 days from the date of this letter. Please note if the completed documents are not returned within 28 days the grant offer will lapse.



Office of the
Police and Crime
Commissioner
for Warwickshire

Yours sincerely

A handwritten signature in black ink, appearing to read "Philip Secombe".

Philip Secombe TD
Police and Crime Commissioner



Terms and Conditions

Definitions

“Recipient” means the person or organisation receiving the grant

“Application form” means the Recipient’s application for the Grant

“Grant” means the grant payable by the Officer of the Police and Crime Commissioner to the recipient under the terms of the grant agreement.

“Grant agreement” includes and incorporates these terms and conditions and any additional conditions contained in the grant offer letter.

“The initiative” means the activity or project for which the Police and Crime Commissioner is giving the grant for as set out in the application form and any supporting documents, and/or as may be varied by the grant offer letter.

“Grant offer letter” means the letter from the Police and Crime Commissioner to the recipient of the grant, which sets out the offer of the grant. This will include: the amount, the purpose for which the grant is to be used, the funding period and any additional conditions.

“Funding period” – the time period as stated in the grant offer letter, within which the grant monies must be spent.

“Acceptance period” – time period as stated in the grant offer letter, within which the grant offer must be accepted.

Conditions

1. The grant is made only for the initiative outlined in the grant offer letter and as described in the application form
2. The Police and Crime Commissioner does not commit to renew or continue financial support to the Recipient after the Funding period has ended and Recipients should therefore have contingencies for dealing with the cessation of any funding stream offered by this scheme.
3. Where the Funding period covers more than one financial year, funding after the first year will only be granted where the Police and Crime Commissioner is satisfied that the initiative has achieved a satisfactory level of performance.

4. There is an expectation for all our successful grant recipients to invite the Police and Crime Commissioner to at least two engagement activities annually with at least 4 weeks' notice.

Equal Opportunities and Lawful Conduct

5. The grant agreement shall be governed by the law of England and Wales.
6. The Recipient shall comply with all laws regulating the way the initiative is operated, the work carried out, the employment of staff or the procurement of goods and services. The Recipient will ensure that throughout the funding period an equal opportunities policy and a Data protection policy is in place. If the initiative involves work with children young people or vulnerable adults the Recipient must also follow a satisfactory protection policy to ensure compliance with all relevant laws and good practice throughout the funding period. The Recipient will obtain all approvals and licenses and any profile checks required by law including but not limited to enhanced Disclosure and Barring Service (DBS) checks of all individuals (including volunteers) who are to provide the services and shall, on request, make the same available to the Police and Crime Commissioner. The Recipient warrants that at all times it has no reason to believe that any person who is or will be employed or engaged by the Recipient in the provision of the services is barred from the activity in accordance with the provisions of the Safeguarding Vulnerable Groups Act 2006 (as amended).
7. The Recipient will, where applicable, comply with the Freedom of Information Act 2000 (the FOI Act) any subordinate legislation made under the FOI Act and any guidance issued by the Information Commissioner.
8. The Recipient will assist and co-operate with the Police and Crime Commissioner to enable him to comply with any obligations under the FOI Act whenever a request is made for information which relates to or arises out of this grant agreement.
9. The Recipient will comply with all applicable requirements of the Data Protection Act 2018 and any national implementing laws, regulations, secondary legislation and other Acts of Parliament relating to data protection, as amended or updated from time to time (Data Protection Legislation), in the processing of all personal information. The parties acknowledge that for the purposes of the Data Protection Legislation the Recipient is the Data Controller (as defined in the Data Protection Legislation).
10. No aspect of the initiative may be party political in intention, use or presentation.
11. The grant may not be used to support or promote religious activity. This will not include inter faith activity.



12. If the Recipient is a charity, the Recipient shall register with the Charity Commission, if necessary to do so.
13. The following are not eligible expenditure under the Grant: payments that support activity intended to influence or attempt to influence Parliament, government or political parties, or attempting to influence the awarding of renewal of contracts or grants, or attempting to influence legislative or regulatory action.
14. Any intellectual property rights created under the initiative will automatically vest with the Police and Crime Commissioner.

Managing the Grant

15. The Recipient shall inform the Police and Crime Commissioner promptly about any changes to information provided and will make sure that the information provided is always true and up to date.
16. The Recipient shall inform the Police and Crime Commissioner immediately in writing of anything that significantly delays, threatens or makes unlikely the initiative's completion.
17. The Recipient shall inform the Police and Crime Commissioner immediately if there is to be any variation to or decrease in the initiative's planned outcomes.
18. The Recipient shall inform the Police and Crime Commissioner of any offer or receipt of funding for this initiative from anyone else at any time during the funding period.
19. The Recipient shall keep all assets funded by the grant safely and in good repair and will keep adequate insurance cover in place.
20. The Recipient shall monitor the progress of the initiative and submit a report on a quarterly basis to the Police and Crime Commissioner in the form attached at Appendix A and in accordance with any requirements in the grant offer letter.
21. The Recipient shall send the Police and Crime Commissioner any further information requested from time to time about the initiative or about the Recipient and the Recipient's activities, the number of users and other beneficiaries and such other information as may reasonably be required. This information may be used to monitor or publicise the initiative, evaluate the initiative or to support any application to the Government for reimbursement of funding.
22. The Recipient shall return any monies as soon as it is clear the monies will not be spent on the approved initiative and at the latest within three months of the end of the funding period save only as agreed in writing by the Police and Crime Commissioner. If the



grant only part-funds the initiative, the Recipient will return the appropriate share of any unspent amount to you.

Procurement, Best Value and Subsidy Control

23. The Recipient must secure the best value for money and act in a fair, open and non-discriminatory manner in all purchases of goods and services.
24. When the Recipient follows a single tender process the Recipient will provide and document the reasons for so doing and shall maintain the relevant documentation on file for a period of 6 years.
25. Payments for items above £200 shall not be made by way of cash payments and all cash payments will be evidenced by receipts.
26. The Recipient must ensure that it complies with the UK subsidy control regime if required and must maintain up to date records to enable it to monitor compliance. Upon request, the Recipient shall provide the Police and Crime Commissioner with access to such records.
27. No person who is not a party to this grant agreement shall have the right to enforce any of its terms.

Duty to report financial irregularities

28. If the Recipient has any grounds for suspecting financial irregularity in the use of any Grant paid under this grant agreement the Recipient shall notify the Police and Crime Commissioner immediately, explain what steps are being taken to investigate the suspicion and keep the Police and Crime Commissioner informed about the progress of the investigation. For the purposes of this clause “financial irregularity includes fraud or other impropriety, mismanagement, and the use of the grant for purposes other than those intended.

Insurance & Indemnity

29. The Recipient will maintain adequate third party and public liability insurance at all times (not less than £5 million pounds unless specifically agreed) and if required to do so will supply copies of confirmation of such insurance cover. Insurance cover must also be



provided to cover employee liabilities and fire and theft cover in respect of any grant supported assets.

30. The Recipient accepts that the Police and Crime Commissioner has no liability towards the Recipient or to any third party for any consequences, whether direct or indirect, that may arise from or in connection with the Recipient's carrying out the initiative or the use of the grant and the Recipient shall hold the Police and Crime Commissioner indemnified against any such claims or damages.
31. The Recipient shall indemnify the Police and Crime Commissioner for any costs, claims, damages or losses which arise as a result of negligence by the Recipient or any persons acting on the Recipient's behalf in the delivery of the initiative or out of any breach by the Recipient of any of these terms and conditions.

Transparency

32. The Police and Crime Commissioner may publish details of all grants awarded on his website www.warwickshire-pcc.gov.uk. This may include the name of the recipient, the amount of grant, purpose and reason for the award in accordance with any statutory duties including those under The Elected Local Policing Bodies (Specified Information) Order 2011.

Publicity

33. The Recipient shall acknowledge the Police and Crime Commissioner's support in any published documents that refer to the initiative or in written or spoken public presentations about the initiative and will include the Police And Crime Commissioner's logo as appropriate or as reasonably requested.
34. The Police and Crime Commissioner must have sight of all documents that are to be published before they become publicly available.
35. The Police and Crime Commissioner must be invited to all promotional events related to the initiative.
36. The Recipient consents to and will co-operate with any publicity about the grant and the initiative as the Police and Crime Commissioner may from time to time reasonably require.

Notification of changes, claims or investigations

37. The Recipient will seek the Police and Crime Commissioner's written agreement before:
- Changing any document (unless as required by law) concerning the aims or governance of the Recipient.
 - Transferring assets to, or merging, amalgamating with, any other person or body.
38. The Recipient shall inform the Police and Crime Commissioner in writing as soon as possible if any legal claims are made or threatened which could adversely affect the initiative during the funding period of the grant.
39. The Recipient shall inform the Police and Crime Commissioner in writing as soon as possible of any investigation concerning the Recipient's organisation, trustees, directors, employees or volunteers carried out by the Police, the Charity Commissioner, HM Revenue & Customs, or any other regulatory body.

Annual Report and Accounts

40. The Recipient will acknowledge the grant in any annual report or accounts published by them covering the period of the initiative.
41. The Recipient shall keep proper and up to date accounts and records for a period of at least six years after the end of the funding period, including summary profit and loss accounts and management accounts, personnel and payroll records and invoices, which show how the grant has been used. The Recipient will make these financial records available for inspection by the Police and Crime Commissioner and provide copies upon request.

Audit and Inspection

42. The Recipient, without charge, will permit any of the Police and Crime Commissioner's representatives, external audit bodies or their nominees on reasonable notice, to visit the Recipient's premises and/or inspect any of the Recipient's activities and/or to examine and take copies of the books of account and such other documents or records as in such officers' view may relate to the use of grant. The Recipient shall assist the



Police and Crime Commissioner or his representatives in any examination as to the economy, efficiency and effectiveness with which the grant has been used.

Payment of Grant

43. The grant will be paid in accordance with the payment schedule contained within the grant offer letter or as may be varied by agreement in writing between the parties.
44. Payments will be made by bank transfer (BACS) into a UK based bank account or building society account in the name of the Recipient, the account requiring the signatures of at least two authorised people for every withdrawal except as otherwise agreed in writing by the Police and Crime Commissioner.
45. The Police And Crime Commissioner reserves the right to withhold all or any payments of the grant. See also clause 45.

Termination and Breach of Conditions

46. In the event of the Recipient (being the person or organisation receiving the grant) failing to comply with any condition contained in this grant agreement or on the happening of any of the following specified events then the Police and Crime Commissioner may reduce, suspend, withhold or cease grant payments or, in the case of dishonesty, also require the repayment of any payment of grant already made.

The specified events shall be:-

- a. The grant application is found to have contained inaccurate or misleading information, which materially affected the assessment of the application.
- b. The Recipient of the grant or the operation of the initiative supported by the grant has, in the opinion of the Police and Crime Commissioner, been conducted dishonestly or in a manner which brings the recipient, the initiative or the Police and Crime Commissioner into disrepute.
- c. The purpose of the initiative has materially changed.
- d. The Recipient ceases to operate or has become insolvent, or is likely to be put into administration or receivership or liquidation, or is about to make an arrangement with, or guarantee a Trust Deed to the Recipient's creditors.



- e. Monies are used for any purpose not contained in the application, the grant offer letter or as otherwise agreed in writing by the Police and Crime Commissioner.

Notices

- 47. All notices and invoices and other correspondence relating to this grant agreement shall be in writing and in English and shall be served by a party on the other party at its address as shown on the grant offer letter or such other address from which the recipient or Police And Crime Commissioner normally operates.
- 48. Notices delivered hereunder shall be deemed to be delivered:-
 - a. If delivered by hand, upon receipt.
 - b. If sent by pre-paid registered first class post (providing it is not returned as undelivered to the sender), two working days after posting.
 - c. If sent by electronic mail, on the date of delivery subject to the following conditions:
 - d. When an electronic mail is sent on a day which is not a working day or after 3.00pm on a working day, the electronic mail is deemed to have been received on the next working day, and
 - e. Each electronic mail containing a formal notice under this Agreement shall be sent with a delivery receipt requested and shall not be deemed to have been received until the sender receives a confirmatory delivery receipt.

Additional Conditions

- 49. Any additional terms and conditions contained in the grant offer letter shall be deemed to be incorporated in these conditions.

Modern Slavery Act 2015

- 50. The Police and Crime Commissioner is committed to ensuring that workers employed or engaged in its supply chains throughout the world are treated fairly, humanely and equitably and to this end the Recipient shall in performing its obligations under the Grant comply, and shall ensure that its Sub-contractors comply, in relation to all workers employed or engaged by it directly or indirectly in connection with the supply of the Goods and/or performance of the Services, with all applicable anti-slavery and



Office of the
**Police and Crime
Commissioner**
for Warwickshire

human trafficking laws, statues, regulations from time to time in force including but not limited to the Modern Slavery Act 2015 and with the policies, procedures and requirements of the International Labour Organisation the United Nations Universal Declaration of Human Rights and the Ethical Trading Initiative (“ET1”) Base Code or an equivalent code of conduct (the “Ethical Sourcing Principles”).

I hereby confirm that I am authorised to act on behalf of the Recipient.

I certify that the information given in the application form and any supporting documents is true and accurate.

I hereby confirm acceptance of the above terms and conditions.

Signed:

Name:

For and behalf of:

(Name of Recipient)

Date:



Office of the
Police and Crime
Commissioner
for Warwickshire

On behalf of organisation:

On behalf of the Recipient I accept the offer of a grant as set out on in the Police and Crime Commissioner's grant offer letter and terms and conditions attached thereto. I confirm that I have read these and agree to abide by them.

Name of Recipient:	
Address including post code:	
Name of representative of Recipient:	
Position:	
Signature:	
Date:	

Bank details for grant payment

Bank name:	
Branch name:	
Sort code:	
Account name:	
Account number:	
Address including post code:	

To accept the grant offer, please complete and return a signed copy of this acceptance form and the attached terms and conditions within 28 days from the date of the grant offer letter. Please note if the documents are not returned within 28 days the grant offer will lapse.

Rugby Borough Council

Climate Change and Environmental Impact Assessment

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action. Rugby Borough Council declared a climate emergency in 2019, in doing so committed to:

- To move the Council's operations towards Carbon Neutrality by 2030.
- To establish action to tackle climate change as a key driver of all decision-making.
- To provide community leadership in reducing the impact of Climate Change.
- To take action to mitigate the impact of climate change on a Borough wide basis and beyond, through adaptation.

The Council's Corporate Strategy (2021-24) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes carbon emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to the Deputy Executive Director.

If you require help, advice and support to complete the forms, please contact Dan Green, Deputy Executive Director.

SECTION 1: OVERVIEW

Portfolio and Service Area	Regulation and Safety Environmental Health and Community Safety
Policy/Service/Change being assessed	Spending of Safer Streets Grant Funding
Is this a new or existing Policy/Service/Change?	New service
If existing policy/service please state date of last assessment	
Ward Specific Impacts	All Wards
Summary of assessment Briefly summarise the policy/service/change and potential impacts.	Rugby Borough Council Submitted a joint funding bid with Warwickshire County Council and the Police and Crime Commissioners Office for funding from Home Office for Safer Streets 4 Rugby Borough Council were awarded £34,500 to complete Environmental Improvements to the area around St Andrews Church and Holy Trinity Graveyard to improve public safety.
Completed By	Henry Biddington
Authorised By	David Burrows
Date of Assessment	21.10.22

SECTION 2: IMPACT ASSESSMENT

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Energy usage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Small amount of additional power for CCTV	Offset by improving lighting using lower energy LEDs		
Fleet usage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Sustainable Transport/Travel (customers and staff)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Community leadership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Biodiversity and habitats	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Adaptation/Mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Impact on other providers/partners	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 3: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	
Key points to be considered through review	
Person responsible for review	
Authorised by	

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published online.
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Minakshee Patel
Corporate Equality & Diversity Advisor
minakshee.patel@rugby.gov.uk
Tel: 01788 533509

Equality Impact Assessment

Service Area	Regulation and Safety
Policy/Service being assessed	Spending of Safer Streets Grant Funding
Is this is a new or existing policy/service? If existing policy/service please state date of last assessment	New
EqlA Review team – List of members	Henry Biddington
Date of this assessment	21.10.22
Signature of responsible officer (to be signed after the EqlA has been completed)	

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Advisor.

If you require help, advice and support to complete the forms, please contact Minakshee Patel, Corporate Equality & Diversity Advisor via email: minakshee.patel@rugby.gov.uk or 01788 533509

Details of Strategy/ Service/ Policy to be analysed

Stage 1 – Scoping and Defining	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	<p>Rugby Borough Council Submitted a joint funding bid with Warwickshire County Council and the Police and Crime Commissioners Office for funding from Home Office for Safer Streets 4</p> <p>Rugby Borough Council were awarded £34,500 to complete Environmental Improvements to the area around St Andrews Church and Holy Trinity Graveyard to improve public safety.</p>
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	<p>Health and Communities Make sure that our communities are safe. Make sure that residents are proud of their community and their borough.</p> <p>ECONOMY Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. Develop and promote our town centre as a place to live, socialise and work.</p>
(3) What are the expected outcomes you are hoping to achieve?	To improve public safety and reduce crime in the project area and reduce the fear of crime and encourage the use of the area
(4) Does or will the policy or decision affect: <ul style="list-style-type: none">• Customers• Employees• Wider community or groups	All

<u>Stage 2 - Information Gathering</u>	As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, eg service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).		
(1) What does the information tell you about those groups identified?	Safer streets aims to help tackle violence against women and girls as there is disproportionately more violence committed against women than men and the improvements planned are aimed at reducing violence and harassment.		
(2) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement? If yes, what were their views and how have their views influenced your decision?	Yes surveys with women and girls have identified the area as an issue for harassment and assaults and an area to avoid.		
(3) If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.			
<u>Stage 3 – Analysis of impact</u>			
(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination? If yes, identify the groups and how they are affected.	RACE	DISABILITY	GENDER Positive impact to reduce violence against women and girls in an area identified as having a problem
	MARRIAGE/CIVIL PARTNERSHIP	AGE	GENDER REASSIGNMENT

	RELIGION/BELIEF	PREGNANCY MATERNITY	SEXUAL ORIENTATION
<p><u>(2) Cross cutting themes</u></p> <p>(a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?</p> <p>(b) Are your proposals likely to impact on a carer who looks after older people or people with disabilities? If yes, please explain how?</p>	<p>a) No</p> <p>b) No</p>		
(3) If there is an adverse impact, can this be justified?	N/A		
(4) What actions are going to be taken to reduce or eliminate negative or adverse impact? (this should form part of your action plan under Stage 4.)	N/A		
(5) How does the strategy/service/policy contribute to the promotion of equality? If not what can be done?	Promotes safer streets and equality for women and girls		
(6) How does the strategy/service/policy promote good relations between groups? If not what can be done?			
(7) Are there any obvious barriers to accessing the service? If yes how can they be overcome?	No		

<u>Stage 4 – Action Planning, Review & Monitoring</u>																														
<p>If No Further Action is required then go to – Review & Monitoring</p> <p>(1)Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1" data-bbox="875 536 2112 762"> <thead> <tr> <th data-bbox="875 536 1120 612">Action</th> <th data-bbox="1120 536 1364 612">Lead Officer</th> <th data-bbox="1364 536 1615 612">Date for completion</th> <th data-bbox="1615 536 1865 612">Resource requirements</th> <th data-bbox="1865 536 2112 612">Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="875 612 1120 651"></td> <td data-bbox="1120 612 1364 651"></td> <td data-bbox="1364 612 1615 651"></td> <td data-bbox="1615 612 1865 651"></td> <td data-bbox="1865 612 2112 651"></td> </tr> <tr> <td data-bbox="875 651 1120 689"></td> <td data-bbox="1120 651 1364 689"></td> <td data-bbox="1364 651 1615 689"></td> <td data-bbox="1615 651 1865 689"></td> <td data-bbox="1865 651 2112 689"></td> </tr> <tr> <td data-bbox="875 689 1120 727"></td> <td data-bbox="1120 689 1364 727"></td> <td data-bbox="1364 689 1615 727"></td> <td data-bbox="1615 689 1865 727"></td> <td data-bbox="1865 689 2112 727"></td> </tr> <tr> <td data-bbox="875 727 1120 762"></td> <td data-bbox="1120 727 1364 762"></td> <td data-bbox="1364 727 1615 762"></td> <td data-bbox="1615 727 1865 762"></td> <td data-bbox="1865 727 2112 762"></td> </tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(2) Review and Monitoring State how and when you will monitor policy and Action Plan</p>	<p>Ongoing monitoring of communications and infrastructure changes</p>																													

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on 21.10.2022’

AGENDA MANAGEMENT SHEET

Report Title:	Treasury Management Mid-Year Report 2022/23
Name of Committee:	Cabinet
Date of Meeting:	5 December 2022
Report Director:	Chief Officer - Finance and Performance
Portfolio:	Finance, Performance, Legal and Governance
Ward Relevance:	N/A
Prior Consultation:	Cabinet
Contact Officer:	Dawn Lewis-Ward Lead Accountant 01788 533408; dawn.lewis-ward@rugby.gov.uk
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	Yes
Forward Plan:	Yes
Corporate Priorities:	This report relates to the following priority(ies): <input type="checkbox"/> Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C) <input type="checkbox"/> Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E) <input type="checkbox"/> Residents live healthy, independent lives, with the most vulnerable protected. (HC) <input checked="" type="checkbox"/> Rugby Borough Council is a responsible, effective and efficient organisation. (O) Corporate Strategy 2021-2024 <input type="checkbox"/> This report does not specifically relate to any Council priorities but
Summary:	The report sets out the treasury management activities from 1 April – 30 September 2022.
Financial Implications:	None as a direct result of the report, however, the report ensures that the Council is aware of the current Treasury Management position.

Risk Management Implications:	There are no risk management implications arising from this report.
Environmental Implications:	There are no environmental implications arising from this report.
Legal Implications:	There are no legal implications arising from this report.
Equality and Diversity:	There are no equality and diversity implications arising from this report.
Options:	None as direct result of this report.
Recommendation:	<ol style="list-style-type: none">1) The report be noted; and2) The monitoring and the review of Treasury Management indicators be agreed.
Reasons for Recommendation:	To comply with the CIPFA Treasury Management Code of Practice and Prudential Code.

Cabinet - 5 December 2022

Treasury Management Mid-Year Report 2022/23

Public Report of the Chief Officer - Finance and Performance

Recommendation

- 1) The report be noted; and
- 2) The monitoring and review of the Treasury Management indicators be agreed.

1. Background

The Council is required to operate a balanced budget which broadly means that, year on year, cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus cash is invested in low-risk counterparties or instruments commensurate with the Council's risk appetite, providing adequate liquidity initially before considering investment return as per the Council's Treasury Management Strategy which was adopted on 1 April 2022.

The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer-term cash flow planning to ensure that the Council can meet its capital spending obligations. This management of longer-term cash may involve arranging long or short-term loans or using longer term cash flow surpluses. On occasion any debt previously drawn may be restructured to meet Council risk or cost objectives.

Accordingly, treasury management is defined as:

"The management of the local authority's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."

2. Introduction

On 1 April 2022, in accordance with the *CIPFA Code of Practice for Treasury Management in the Public Sector*, Council approved the Treasury Management Strategy for 2022/23. The Code requires the Council to approve a treasury management strategy before the start of each financial year, a mid-year report and an annual report after the end of each financial year. The code requires local authorities to comply with three key principles:

KEY PRINCIPLE 1

*Public service organisations should put in place formal and comprehensive objectives, policies and practices, strategies and reporting arrangements for the **effective management and control of their treasury management activities.***

KEY PRINCIPLE 2

*Their policies and practices should make clear that **the effective management and control of risk** are prime objectives of their treasury management activities and that responsibility for these lies clearly within their organisations. Their appetite for risk should form part of their annual strategy, including any use of financial instruments for the prudent management of those risks, and should ensure that **priority is given to security and portfolio liquidity** when investing treasury management funds.*

KEY PRINCIPLE 3

*They should acknowledge that the **pursuit of value for money** in treasury management, and the use of suitable performance measures, are valid and important tools for responsible organisations to employ in support of their business and service objectives; and that within the context of effective risk management, their treasury management policies and practices should reflect this.*

This is a report on the Treasury Management activities for the first half of 2022/23 (the mid-year report).

In addition to its own resources (General Fund and Housing Revenue Account (HRA) balances, capital receipts, etc.) the Council also collects council tax on behalf of Warwickshire County Council, the Office of the Police and Crime Commissioner for Warwickshire, and Parish Councils. This means that at given points of time during the financial year, the Council has significant cash holdings which require management prior to scheduled payment dates to the preceptors. A summary of transactions, and the levels of investments and borrowings held, is contained within this report.

The Chief Financial Officer reports that during the first 6 months of the year there have been two breaches of the treasury management strategy. The first breach occurred on 8 April whereby there was in excess of £10.000m in the Lloyds bank account due to an unplanned amount of income being received too late in the working day for officers to negotiate the movement of excess funds. The second occurrence related to overseas investment limit being breached by £1.000m on 28 September. This issue was resolved subsequently on 14 October and improvements to monitoring systems have been made to ensure that possible breaches of this nature can be avoided.

To further enhance the strategic treasury management process and to provide key data to stakeholders, officers are currently in the process of creating a dedicated treasury management dashboard which will review investments and borrowing, report on treasury management indicators and monitoring counterparty and investment limits as included in the Treasury Management Strategy. This is currently at the concept stage, but once fully developed officers will share with Members for reference purposes.

3. Economic Review April - September 2022 – provided by Link Asset Services (Corporate Treasury Advisors) September 2022

The British economy unexpectedly expanded 0.2% on quarter in the Q2 2022, better than initial estimates of a 0.1% contraction. Services rose 0.2%, revised from initial estimates of a 0.4% drop with the largest contributors coming from human health and social work. Meanwhile, production contracted 0.2% with manufacturing falling 1.1% and mining 1% while electricity and gas, went up 3.9%. The UK trade deficit narrowed to 7.8 billion in July from 11.4 billion in the previous month. It was the smallest trade shortfall since last December, as exports rose by 4.2% (goods sales advanced by 7.2% and exports of services were up 0.6%). Meanwhile, imports fell by 1.6% as goods purchases declined by 2.3% mostly from non-EU countries (-4.1%). Conversely, imports of services rose by 0.7%.

The Chancellor, at that time announced his “Growth Plan” in a Mini-Budget. The Growth Plan sets an ambitious target for annual economic growth of 2.5% and is supported by a range of cuts to both direct and indirect taxes, support for individuals and businesses to tackle increasing energy costs, and measures to encourage and reward investment. The proposed fiscal package and its unfunded nature, which seemed somewhat at odds to the Bank of England's focus on dampening inflation, caused a sharp market reaction in the immediate aftermath of the announcement. This saw Bank Rate expectations through the final two meetings of the year and 2023 ratchet higher, while gilt yields rose significantly.

UK employment went up by 40,000 in the three months to July, the smallest increase in five months, and less than a third of market forecasts of 128,000. Full time employees and self-employed workers increased while part time employees decreased. The unemployment rate in the UK fell to 3.6% in the three months to July, the lowest since 1974, from 3.8% in the previous period as the number of people who are no longer looking for work increased. Average weekly earnings including bonuses in the UK increased by 5.5% y/y in the three months to July, above an upwardly revised 5.2% in the three months to June. In addition, regular pay which excludes bonus payment went up 5.2% after 4.7% rise in the previous period. However, adjusted for inflation, total pay fell 2.6% while regular pay dropped 2.8% amid a squeeze in UK living standards.

UK inflation, as measured by the Consumer Price Index edged lower to 9.9% in August however increased in September to July levels of 10.1%.

The Bank of England's Monetary Policy Committee raised its key interest rate by 50bps to 2.25% during its September 2022 meeting, the 7th consecutive rate hike, and pushing borrowing costs to the highest since 2008.

There was a fall in retail sales by 1.6% m/m in August, the biggest decline so far this year and following a 0.4% rise in July. In August 2022, initial estimates show that the public sector spent more than it received in taxes and other income. This required it to borrow £11.8 billion, which was £5.8 billion more than the £6 billion forecast by the Office for Budget Responsibility (OBR).

4. Interest Rate Outlook

The Council has Link Asset Management as its treasury advisors and part of their service is to assist the Council to formulate a view on interest rates. The Public Works Loan Board (PWLB) rate forecasts below are based on the Certainty Rate (the standard rate minus 20 bps) which has been accessible to most authorities since 1 November 2012.

The forecast on 27 September set out a view that both short and long-dated interest rates will be elevated for some little while, as the Bank of England seeks to squeeze inflation out of the economy, whilst the government is providing a package of fiscal loosening to try and protect households and businesses from the ravages of ultra-high wholesale gas and electricity prices. This forecast has since been updated as at 8 November.

The increase in PWLB rates reflects a broad sell-off in sovereign bonds internationally but more so the disaffection investors have with the position of the UK public finances after September's "fiscal event". To that end, the Monetary Policy Committee (MPC) has tightened short-term interest rates with a view to trying to slow the economy sufficiently to keep the secondary effects of inflation – as measured by wage rises – under control, but its job is that much harder now.

The Bank Rate was raised to 2.25% at the Monetary Policy Committee's meeting in September and the rate was increased further to 3% at the November meeting. It is expected that rates will peak at 4.50% by Q2 2023.

Link's PWLB rate forecasts below are based on the Certainty Rate (the standard rate minus 20 bps, calculated as gilts plus 80bps) which has been accessible to most authorities since 1 November 2012.

Link Group Interest Rate View	08.11.22												
	Dec-22	Mar-23	Jun-23	Sep-23	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25
BANK RATE	3.50	4.25	4.50	4.50	4.50	4.00	3.75	3.50	3.25	3.00	2.75	2.50	2.50
3 month ave earnings	3.60	4.30	4.50	4.50	4.50	4.00	3.80	3.30	3.00	3.00	2.80	2.50	2.50
6 month ave earnings	4.20	4.50	4.60	4.50	4.20	4.10	3.90	3.40	3.10	3.00	2.90	2.60	2.60
12 month ave earnings	4.70	4.70	4.70	4.50	4.30	4.20	4.00	3.50	3.20	3.10	3.00	2.70	2.70
5 yr PWLB	4.30	4.30	4.20	4.10	4.00	3.90	3.80	3.60	3.50	3.40	3.30	3.20	3.10
10 yr PWLB	4.50	4.50	4.40	4.30	4.20	4.00	3.90	3.70	3.60	3.50	3.40	3.30	3.20
25 yr PWLB	4.70	4.70	4.60	4.50	4.40	4.30	4.10	4.00	3.90	3.70	3.60	3.50	3.50
50 yr PWLB	4.30	4.40	4.30	4.20	4.10	4.00	3.80	3.70	3.60	3.40	3.30	3.20	3.20

5. Interim Treasury Management Report and Summary of Transactions

Where the Council has surplus funds, these funds are invested to achieve maximum return whilst keeping in mind the core principles of Security, Liquidity and Yield.

In reviewing and monitoring the impact of the Council's treasury management activities, rather than looking at the interest received on investments and the interest paid on borrowings in isolation it is important that the Net Cost of Borrowing against the Budget that has been set is monitored. Given the spread of interest rates for investments against those for borrowing, there are times when borrowing is deferred, and investments minimised, because of surplus cash held, which is used to meet day to day expenditure. Therefore, an underachievement in interest receivable against budget, whilst seeming to be adverse, may, because it also produces a

reduction in interest payable on borrowing, lead to a more favourable outcome for the Council.

The Council has a strategy of matching Investment maturity profiles with loan maturity profiles in order that there are sufficient funds available to repay the borrowing where it is in the best interests of the Council.

The table below shows a summary of the treasury management activity over the six-month period from 1 April to 30 September 2022.

	Principal Amount £000	Interest Rate %
Investments - as at 1 April 2022	92.789	1.24%
- matured in period	(32.940)	
- arranged in period	38.345	
- as at 30 Sept 2022	98.194	1.73%
Debt - as at 1 April 2022	90.600	2.03%
- matured/repaid in period	0	
- arranged in period	0	
- as at 30 Sept 2022	90.600	2.03%

Between October and March 2023, there will be £49.000m of current investments maturing and £7.300m of loans that are due for repayment. Over the next few months, officers will be reviewing the approach to take which may lead to using the maturing investments to repay the loans due and invest any surplus maturing investments in alignment with future maturing loans. The Council monitors its cashflow forecasts on a daily basis to facilitate this strategy.

Please see **Appendix A** and **Appendix B** for further details.

6. Debt Management Strategy

As previously advised the redevelopment of the Council's multistorey flat sites resulted in the increase of the HRA Capital Financing Requirement from 2020/21 onwards.

As a result of external factors since 2020 including the COVID-19 pandemic, the planned spend of the sums borrowed from PWLB has not taken place on the redevelopment. This has meant that the Council has had to invest some of the £66m advance PWLB Loan which has to help mitigate the cost of interest.

At 31 March 2021 the authority was 'overborrowed' which meant that the authority was incurring a 'cost of carry' (paying interest costs which cannot be wholly mitigated from temporary investment income) whilst it holds borrowing awaiting capital expenditure to be undertaken. However, since then, £75.400m of Loans have matured and been repaid. The table below shows the change in the position.

	March 2021 £m	March 2022 £m	September 2022 £m	Forecast March 2023 £m
Gross Debt	153.000	90.600	90.600	83.300
CFR	86.744	86.879	90.727	90.727
Over (Under borrow)	66.256	3.721	(0.127)	(0.427)

For future borrowing, the Council will look to match financing with asset life where appropriate and has the option to utilise the Public Works Loan Board (PWLB), other local authorities, financial institutions or 'internal borrowing', that is cash supporting the Council's reserves, balances and cash flow as a temporary measure.

In addition to borrowing from external sources the Council has the option of 'intrafund' borrowing – that is, loans between the General Fund and Housing Revenue Account (HRA). In consultation with its treasury management advisors the Council will continue to look at this facility over the term of the General Fund Medium Term Financial Plan and the HRA Business Plan to ensure opportunities are maximised.

7. Treasury Management Indicators

The Council measures its exposures to treasury management risks using the following indicators. Council is asked to note the following indicators as at 30 September 2022

Security: Average credit rating

To measure the security of its portfolio, the Council compares the historic risk of default of its investments against a maximum target rate.

As an example, based on historic data, a AAA (least risk) rated investment has 0.04% chance of default within one year and a 0.17% chance of default within three years. A BBB+ (most risk) rated investment has a 0.13% chance of default within one year and a 0.63% chance of default within three years. There have been no default events associated with any counterparties the Council has utilised within its investment portfolio since 2009 at the time of the Icelandic banking collapse. All funds and accrued interest held at that time were subsequently reclaimed via the administration process.

Using the criteria above, the Council's overall portfolio at 30 September 2022 had a 0.017% risk of default, i.e., a very small, but not nil, probability.

	Limit	Actual	Met?
Historic risk of default	0.25% (max)	0.02%	✓

Maturity structure of borrowing

This indicator is set to control the Council's exposure to refinancing risk – that all borrowing falls due for repayment at the same time. The repayment structure of fixed rate borrowing (loans of 12 months or longer) was:

	Upper Limit	Lower Limit	Actual	Met?
Under 12 months	50%	0%	8%	✓
12 months and within 24 months	50%	0%	0%	✓
24 months and within 5 years	60%	0%	2%	✓
Five years and within 10 years	60%	0%	0%	✓
10 years to 20 years	75%	0%	1%	✓
20 years to 30 years	75%	0%	1%	✓
30 years +	75%	0%	89%	x

The Council has breached the upper limit for borrowing with 30 years+ until maturity. This is due to the amount of borrowing that has matured in the last 12 months that has repaid to reduce the overborrowed position.

It is not envisaged that this indicator will improve in the short term, as it would not be prudent to take any long-term borrowing given the rise interest rates in recent times and the forecast that they will rise further. As part of future forecast and planning process, consideration will be given to the timing of any future borrowing and the term, to ensure a spread of maturities.

Principal sums invested for periods longer than 364 days

The purpose of this indicator is to control the Council's exposure to the risk of incurring losses by seeking early repayment of its investments. It is used in conjunction with the liquidity indicator to ensure sufficient cash resources are available without penalty during the short to medium term. The total principal sums invested to final maturities beyond the year end were:

	2022/23 £m	2023/24 £m	2024/25 £m
Limit on principal invested beyond year end	£70	£70	£70
Actual principal invested beyond year end	£31	£25.50	£6
Within limit?	✓	✓	✓

8. Reserves

The Council holds earmarked reserves for a variety of purposes and in the period leading up to the use of the fund's officers will use the balances in the day to day treasury management functions. This will allow for the generation of investment returns but also will help to prevent the use of short term borrowing which will attract a cost at a time where interest rates are significantly higher than previous years.

As at 31 March the council had £61.982m in usable reserves available for use for Treasury Management purposes.

Name of Meeting: Cabinet

Date of Meeting: 5 December 2022

Subject Matter: Treasury Management Report 2022/23 – Progress Report

Originating Department: Finance and Performance

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

APPENDIX A

Investments	Principal £000s	Average % Rate
Matured April to Sept 2022	32,440	1.1118%
Maturing 2022/23	49,000	1.2920%
Maturing 2023/24 and later	45,000	2.1619%
Grand Total	126,440	1.5216%
Total Investments Sept 2022	94,000	

**Excludes FV movement of DIF and Property Funds*

APPENDIX B

Loans	Principal £000s	Average % Rate
Matured April to Sept 2022	-	0.0000%
Maturing 2022/23	7,300	2.9507%
Maturing 2023/24 and later	83,300	1.9464%
Grand Total	90,600	2.0315%
Total Loans Sept 2022	90,600	

APPENDIX C

Approved countries for investments as of 30 September 2022

Based on lowest available rating

AAA	AA+	AA	AA-
Australia	Canada	Abu Dhabi (UAE)	Belgium
Denmark	Finland	France	Hong Kong
Germany	USA		Qatar
Luxembourg			UK
Netherlands			
Norway			
Singapore			
Sweden			
Switzerland			

NB. Those countries highlighted in ***bold italics*** are those which we currently hold investments.

Agenda No 16

AGENDA MANAGEMENT SHEET

Report Title: Calendar of Meetings 2023/24

Name of Committee: Cabinet

Date of Meeting: 5 December 2022

Report Director: Chief Officer - Legal and Governance

Portfolio: Finance, Performance, Legal and Governance

Ward Relevance: All wards

Prior Consultation: Leadership Team and other key officers involved in meetings

Contact Officer: Veronika Beckova
Democratic Services Officer
01788 533591; veronika.beckova@rugby.gov.uk

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C)
 Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E)
 Residents live healthy, independent lives, with the most vulnerable protected. (HC)
 Rugby Borough Council is a responsible, effective and efficient organisation. (O)
[Corporate Strategy 2021-2024](#)
 This report does not specifically relate to any Council priorities but should be considered by Cabinet for the following reason: Cabinet is required, under the Council's Constitution, to fix the dates and times of Council, Cabinet and committee meetings.

Summary: Cabinet is required, under the Council's Constitution, to fix the dates and times of Council,

Cabinet and committee meetings each municipal year. The proposed calendar of meetings for 2023/24 is attached at Appendix 1.

Financial Implications:

Risk Management/Health and Safety Implications:

Failure to approve the Calendar of Meetings would be a breach of the Council's Constitution and would result in there being no democratic process.

Environmental Implications:

There are no environmental implications arising from this report.

Legal Implications:

There are no legal implications arising from this report

Equality and Diversity:

There are no equality and diversity implications arising from this report.

Options:

N/A

Recommendation:

The Calendar of Meetings for 2023/24, as at Appendix 1 to the report, be approved.

Reasons for Recommendation:

In order to comply with the council's Constitution.

Cabinet - 5 December 2022

Calendar of Meetings 2023/24

Public Report of the Chief Officer - Legal and Governance

Recommendation

The Calendar of Meetings for 2023/24, as at Appendix 1 to the report, be approved.

1. Introduction

- 1.1 Cabinet is required, under the Council's Constitution, to fix the dates and times of Council, Cabinet and committee meetings.
- 1.2 The calendar of meetings set out at Appendix 1 takes into account the following requirements:
 - a) 5 cycles of meetings per year
 - b) 6 ordinary meetings of Council*
 - c) A meeting of Audit and Ethics Committee to be held in September 2023 to consider the approval of the Statement of Accounts including the Annual Governance Statement
 - d) A special meeting of Council to be held in February 2024 to consider the Budget Setting
 - e) Planning Committee to meet on a 4-week cycle throughout the year
 - f) The annual meeting of Council to avoid the annual meeting of Warwickshire County Council

Appeals Committee, Grievance Committee and Shareholders Committee meet on an ad hoc basis.

*An additional ordinary meeting of Council has been included in the calendar of meetings for 2023/24 to alleviate the pressure on the agenda for the ordinary meeting of Council scheduled in July.

2. School Holidays for Warwickshire, LGA Annual Conference and Political Parties' Conferences

- 2.1 Every effort has been made to avoid scheduling meetings during school holidays for Warwickshire, the dates of the LGA Annual Conference and political parties' conferences in 2023. However, due to the volume of meetings to be incorporated in the calendar, it has not been possible to avoid these dates entirely.

Name of Meeting: Cabinet
Date of Meeting: 5 December 2022
Subject Matter: Calendar of Meetings 2023/24
Originating Department: Legal and Governance

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Calendar of Meetings 2023/24

Mon	May	22	Aug	7	Oct	23	Jan	8	Cabinet	Mar	25	<p>NOTES</p> <p>Meetings of Council commence at 7pm.</p> <p>Meetings of Cabinet and committees commence at 6pm with the exception of meetings of Planning Committee which commence at 5.30pm.</p> <p>C = Conservative Party Conference: 01/10/2023 – 04/10/2023</p> <p>L = Labour Party Conference: 08/10/2023 – 11/10/2023</p> <p>LD = Liberal Democrat Party Conference: TBC</p> <p>LGA = LGA Annual Conference: 04/07/2023 – 06/07/2023</p> <div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 10px auto;"> school holidays Warwickshire </div>	
Tue		23		8		24		9			26		
Wed		24		9		25		10	Planning		27		
Thu		25		10		26		11			28		
Mon		29	Bank Holiday	14		30		15		Apr	1		Bank Holiday
Tue		30		15		31		16			2		
Wed		31		16	Planning	Nov	1	17			3		
Thu	June	1		17		2		18			4		
Mon		5		21		6	Cabinet	22			8		Scrutiny
Tue		6		22		7		23			9		
Wed		7		23		8	Planning	24			10		Planning
Thu		8		24		9		25			11		Audit and Ethics
Mon		12		28	Bank Holiday	13		29	Scrutiny		15		Cabinet
Tue		13		29		14		30			16		
Wed		14	<i>Council</i>	30		15		31			17		
Thu		15		31		16		Feb	1	Audit and Ethics	18		
Mon		19	Scrutiny	Sep	4	20	Scrutiny	5	Cabinet		22		
Tue		20			5	21		6	<i>Special Council</i>		23		
Wed		21	Planning		6	22		7	Planning		24		<i>Council</i>
Thu		22			7	23		8			25		
Mon		26	Cabinet		11	27		12		Borough and Police and Crime Commissioner Elections 2 May 2024			
Tue		27			12	28		13					
Wed		28			13	29	Planning	14					
Thu		29	Audit and Ethics		14	30	Audit and Ethics	15					
Mon	July	3			18	Dec	4	Cabinet		19			
Tue	LGA	4			19		5			20			
Wed	LGA	5			20	<i>Council</i>	6	Planning		21	<i>Council</i>		
Thu	LGA	6			21		7			22			
Mon		10			25		11			26			
Tue		11	Licensing		26		12			27	Licensing		
Wed		12	<i>Council</i>		27		13	<i>Council</i>		28			
Thu		13			28	Audit and Ethics	14			29			
Mon		17		Oct C	2	Cabinet		18		Mar	4		
Tue		18		C	3			19			5		
Wed		19	Planning	C	4			20		6	Planning		
Thu		20	Audit and Ethics		5			21		7			
Mon		24		L	9		25	Christmas Day		11			
Tue		25		L	10		26	Boxing Day		12			
Wed		26		L	11	Planning		27		13			
Thu		27			12			28		14			
Mon		31	Cabinet		16		Jan	1	New Year's Day		18	Cabinet	
Tue	Aug	1			17	Licensing		2			19		
Wed		2			18			3			20		
Thu		3			19			4			21		