

Planning Policy Team Rugby Borough Council Town Hall Evreux Way Rugby CV21 2RR

14<sup>th</sup> January 2025

Dear Sir/ Madam,

RRS007/GM

# RE: RUGBY BOROUGH COUNCIL LOCAL PLAN REVIEW- CALL FOR SITES

We are writing to you on behalf of Urban&Civic (U&C) in relation to the Houlton development, Rugby in response to the call for sites to inform the emerging Rugby Borough Local Plan Review.

U&C are the Master Developers of Houlton, which benefits from outline planning permission (OPP) (R17/0022) for up to 6,200 homes, commercial and employment floorspace and a wide mix of complimentary land uses and green infrastructure.

This vibrant new community now hosts approximately 1,350 residential occupations, St Gabriels Primary School, Houlton School (6FE Secondary School), Dollman Farm Local Centre including restaurants, offices and community facilities and a vast network of pedestrian and cycling routes through the extensive provision of open space.

U&C wish to submit a site within Houlton for consideration as part of the call for sites process, for residential use. The parcel is identified on plan RRS007-166, appended to this letter. It comprises 6.78ha of grassland which is occasionally grazed, located south of the A428, Crick Road and north of the Northampton Loop Line which connects Rugby to London. East of the site is the Daventry International Rail Freight Terminal (DIRFT) and to the west the site is bound by a farm access track, beyond which lies agricultural land, which is the subject of a planning application for a Parkway rail station. The site is capable of accommodating c. 250 new homes, subject to detailed masterplanning.

The site falls within the Houlton outline planning permission and is identified as an employment parcel. This call for sites submissions proposes its alternative use for residential.



## Call for Sites Assessment

The site south of the A428, is put forward as part of RBC's Call for Sites process for a number of reasons. These are set out below.

#### Changing Economic Context

The OPP is now over 10 years old. Its approach to employment land, which identified relatively modestly sized, peripheral parcels for employment use, is now outdated and not reflective of current market demand. The S73 application, submitted in 2017, identified the over provision of employment land at Houlton, and now, in 2025 the wider employment context has even further evolved. The market in this location, at the confluence of several strategic road and rail connections, is strongly tilted towards large scale, strategic logistics employment buildings, built to meet the ever-increasing demand for B8 floorspace. This market seeks large floorplate, highly sustainable buildings with quick and direct access to the strategic road network. This is reflected in the response to the call for sites in respect of land to the north of Houlton, where there is land of sufficient scale to accommodate such requirements.

Land south of the A428 has been marketed for employment uses for a period of 21 months. Despite various marketing strategies, there have been no meaningful enquires that have resulted in a development proposal. Whilst the site benefits from proximity to DIRFT, its size and narrow shape prevents its use for additional B8 units of the scale sought by the market. On this basis, it is reasonable to conclude that this development land is not considered appropriate from a market perspective for employment uses and is likely therefore to remain vacant.

To provide further context, in December 2024, Frasers Group received a resolution to grant planning permission (R23/1027) for an employment-led headquarters campus development which will deliver over 336,000sqm of employment and ancillary uses. This Green Belt site did not benefit from a Local Plan allocation but will, once complete, deliver significant employment land to meet the borough's need, in addition that already allocated. This employment site will provide the strategic scale of development that that is sought by the market, thereby lessening pressure on and providing opportunities to re-think the appropriate land use of some of the Borough's smaller employment sites, such as land south of the A428.

#### Potential Residential Use

The site currently benefits from outline planning permission for employment through the Houlton OPP (R17/0022). This confirms that the site is suitable for development in principle, as it has already been rigorously assessed as part of the Environmental Impact Assessment, considered suitable and consequently approved. However, it is now proposed that the site's residential use be considered as part of the Local Plan Review, to respond to both the evolving employment market and to contribute to meeting Rugby's increasing housing needs.

The site is located within an existing sustainable urban extension (SUE) which is currently delivering a range of land uses including education, retail, leisure, health, community facilities, employment/ commercial, open spaces and a sustainable transport network. The infrastructure and facilities secured within the Houlton SUE, in close proximity to the site would support the delivery of additional housing in this location.

The sustainable location of the site is further enhanced by the approved Rugby Station Parkway scheme (outline planning permission was issued in December 2024 – RBC/23CC003), which will comprise a two-platform parkway railway station. The station will be located on land immediately to the west of the site, providing an ideal opportunity for new residents to access wider employment opportunities and connections to Rugby, London, Birmingham and beyond via fully sustainable modes of transport. This would be supported by the careful masterplanning of the site which would deliver direct active travel connections to the station



and appropriate housing densities to reflect the highly accessible location and make best use of the site.

The OPP description of development refers to 'up to' maximum quanta of development in respect of both residential and employment uses. It may be possible for land south of the A428 to come forward as residential within the overall maximum (6,200 homes), subject to any necessary planning regularisation of the OPP, or Key Phase material to secure the change to a residential use. Alternatively, a separate planning application may be required.

The Call for Sites Proforma sets out the requirements for any site to be considered suitable for allocation within the Local Plan. These requirements are considered in turn below with an assessment provided against the site south of the A428, concluding that the site is unconstrained, suitable and available for residential development.

Call for Sites Requirements	Assessment of the site south of the A428
Access to existing infrastructure	The site has full access to all necessary utilities including electricity, gas, mains sewer, mains water and telecoms.
Access from Highway	Yes access is available from the A428 via an existing agricultural access. The OPP contains detailed approval for a junction spur off the A428
Highway Works	The only highways works that will be necessary is construction of an access from the A428.
Ransom Strips / third party land required.	There are no ransom strips or third party land required to access this site
Legal Issues	There are no legal issues associated with this site.
Existing Occupiers	There are no occupiers of the site.
Public Access / Rights of Way	There is no public access to the site or public rights of way located on the site.
Ecology / Wildlife Designations and other known issues	The site has no ecology or wildlife designations.
Trees, hedgerows and woodlands	There are some existing hedgerows and trees located on the site, predominantly around the perimeter of the site. These could be incorporated into any residential scheme on the site.
Land Contamination	There is no land contamination on the site.
Heritage Designations	There are no heritage designations such as listed buildings, conservation area or scheduled ancient monuments located on or adjacent to the site.
Flooding	The site is located in flood zone 1 demonstrating that the site has a low probability of flooding from rivers.
Other Physical Constraints	There are no physical constraints on the site.
Infrastructure constraints	There are no pylons, gas mains or telecommunications within the site.



Open space and recreation	There are no open spaces and recreational areas located on the site though these are provided within the Houlton SUE within close proximity to the site.
Other known issues / constraints.	The A428 and West Coast Main Line adjacent to the site will require appropriate mitigation to address any potential noise or air quality impact.
Distance and walking time to closest bus stop	Bus stops immediately adjacent to the site on the A428
Distance and walking time to closest amenities	0.2 miles and 5 minutes. Footpath connection and pedestrian refuges allow for safe active travel routes to Houlton and the local centre at Dollman Farm.
Distance and walking time to closest rail station	3.7 miles, 1 hour 20 mins to Rugby Station and 0.2 miles and 5 minutes to proposed Rugby Parkway Station.
Any known issues with public transport – frequency of services etc.	· · · · · · · · · · · · · · · · · · ·
Any known issues with amenities	None known.
Other accessibility issues relevant to the nature of the proposal.	None.

Further to the assessment against the call for sites proforma requirements and site considerations set out within this letter, it is requested that this sustainable site with limited site constraints and with outline planning permission for development be considered for a residential allocation within RBC's Local Plan Review. We welcome the opportunity to support RBC through the Local Plan process and provide additional supporting technical information in relation to this site south of the A428 for the next stage of the Local Plan consultation process.

Yours sincerely



### **GABY MEDFORTH MRTPI**

Associate

cc:

Encl: Call for Sites Location Plans



