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Date

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Dear Ella Casey

Land North of Rounds Gardens R24/0111

Please find below summary of our observations in relation to the above planning application, if you require any further detail, please do not hesitate to contact me.

Social Housing:

The Estates and Project Management Team (EPMT) continue to be surprised that there is no social housing proposed for the location. It is particularly perturbing given the council's own plans for a social housing development immediately to the south of the scheme's location and given the known housing shortage (specifically social housing) in the town centre. If we accept that social housing is not viable in this location and on a project of this scale, we are agreeing that it is not viable to build social housing in the borough - a position we believe is untenable.

Design and Access Statement:

Permanent water feature now shown being fenced, addressing the previously raised safety concerns.

The proposed property styles do not seem to be in keeping with the surrounding environment, and neither is the density. A denser scheme would ultimately help with the financial position of the scheme and allow for social housing to be included on the site. At a quick glance, the scheme appears to reflect many of the sub-urban developments around Rugby, however this location is in the heart of the town centre.

The site is not as well linked to the surrounding environment as identified in the statement, see comments on the Transport below.

Flood Exceedance:

Plan identifies existing flood routes into the site from the south, and along the existing footway (flow east west, joining flows from the south); there is no flow route indicated flowing west east from York Street identified (clearly shown in the Design and Access Statement surface water flood map extract); this land falls significantly towards the site as the east-west flow route does.

Transport:

Figure 1 (reproduced below) continues to show a pedestrian / cycle access to the southwest, which includes work outside of the site's red line boundary, across an RBC owned grass play area, there is no public right of way or footpath at that point, no permission has been sought from RBC to utilise this route and no agreement is in place. Figure 1 therefore continues to give the impression that the site has more connectivity than in fact is available. This detail of this connectivity is not shown on the detailed highway plan drawings.

Figure 1: Extract from WCC Response



The revised report excludes upgrades to the southern east – west footpath and identifies future upgrades to be part of the work to the site to the south. This is factually inaccurate. Historical plans of the site (included in the original submission) identify this access route being within their own parcel of land. Upgrades to it should therefore form part of this scheme (or be provided for as part of this scheme). Proposing building immediately adjacent to their southern boundary actively prevents future development of this access route within their own undertaking. RBC owns land to the eastern end of this route, which has historically been a bottle neck and would welcome discussion's as to what can now be achieved along our shared boundary in relation to enhanced footways / cycle route provision.

Despite the traffic survey data, the proposed 1-way system is going to cause traffic disruption on the surrounding streets:

Traffic queuing to turn right into Dale Street backing on to the Evreux Way / Corporation Street round about (considered problematic already) to get into the head of the 1-way system

Traffic will only be able to leave the eastern site by turning out of either Duke Street or Dale Street onto Newbold Road, turning south bound will be practically impossible in rush hour / on Saturdays and is considered difficult currently.

The revised note makes no comment in relation to the original submissions reference to Workhubs (7.7.1), the nearest of which remains as Coventry.

Tree removal Plan / Earth Works Appraisal:

Previous comments appear to have been addressed by inclusion of site sections, however it is noted that the revised cut and fill plan continues to show a significant cut greater than -3m to the eastern boundary area which is not possible if the trees in this location are to be retained and the site sections are accurate. See red circled items on extracts below:



Site Plan:

Plots 110-115 - the distance to the south of the proposed development. There is 5m build offset applied to northern boundary of development, which in principle should also be applied to the southern boundary.

Plot 112 - overlooking 17 Hill Street, windows are noted to be overlooking 17 Hill Street. Front door exits onto footpath which does not provide a secure by design plan.

Viability Assessment:

As noted above a denser scheme using house types / styles from the surrounding area could well improve the sites viability and therefore allow for the inclusion of social housing within the proposed development. It should not be a surprise that a 'sub-urban' scheme does not break even in a town centre location.

The viability report also shows a Gross Development Value (GDV) of £33,770,803. This provides an average house price of less than the average reported by Land Registry for Rugby, despite most of the houses being three and four bed houses. We would therefore question the values used to produce the GDV as this is being used as justification for not providing social housing.

Yours sincerely

Amy Cavendish
Estates Officer