

## **RUGBY BOROUGH LOCAL PLAN EXAMINATION**

### **STAGE 1 HEARINGS**

#### **ISSUE 3B: STRATEGIC ALLOCATIONS - COTON PARK EAST (POLICIES DS5 AND DS7)**

#### **PEGASUS GROUP ON BEHALF OF:**

#### **PERSIMMON HOMES AND AC LLOYD**

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## **1.1 INTRODUCTION**

- 1.1.1 This Statement comprises the joint submission made on behalf of Persimmon Homes and AC Lloyd.
- 1.1.2 The following Statement should be read in conjunction with earlier representations made in respect of the draft Local Plan.
- 1.1.3 Persimmon Homes and AC Lloyd are broadly supportive of the submission version local plan but believe that certain modifications are required before the plan can be considered a sound and effective basis for the planning of the area.
- 1.1.4 This Statement seeks to respond to a number of questions in respect of the 'Strategic Allocations - Coton Park East (Policies DS5 and DS7)' (Matter 3, Issue 3b).
- 1.1.5 On-going discussions are taking place between the Council and Persimmon Homes and AC Lloyd, and a meeting has been arranged for 16<sup>th</sup> January next to discuss what matters could usefully be agreed between the parties in the form of a Statement of Common Ground. It is the intention that such a Statement will be made available in advance of the opening of the Stage 1 Hearings.

## 1.2 QUESTIONS

**1. Is the strategic allocation at Coton Park East positively prepared, justified, effective and consistent with national policy? In particular:**

**a) What is the current planning status of the site? What site specific assessments have been carried out to underpin Policy DS7 and determine the mix of uses proposed, the impacts of the development and the deliverability of the site, its infrastructure and facilities?**

1.2.1 To provide some context for answering these questions, it is considered useful to set out a brief planning history as background to the Coton Park East Strategic Allocation.

- The proposed allocation adjoins developed areas of Rugby previously included as allocations for employment and residential development in the earlier Local Plan, which preceded the extant Core Strategy.
- The allocation was included as part of a site which was previously promoted for a mix of uses to Rugby Borough Council in response to the preparation of the Core Strategy;
- The Council chose to allocate Rugby Gateway and Rugby Radio Station and did not allocate Coton Park East as it considered that both proposed allocations met the then dwelling requirement.
- Prior to, and on adoption of the Core Strategy the Council failed to maintain a five year housing land supply due in large part to the delay in delivery of the larger sites. Persimmon Homes applied for 150 homes (110 on Phase B1 and 40 on B2) immediately south of the proposed allocation, adjoining the existing built up area in late 2010. Both applications were granted by the Council in April 2015. Construction on the site has commenced and the first properties were released for sale in early December. First completions are due in the Spring of 2018.
- These permitted schemes are not included as part of the allocation identified as DS3.2 and DS4.1 on the Urban Proposals Map 2016, but are proposed to be included within a re-drawn Urban Edge boundary reflecting their status as permitted sites, under construction.

- The current proposed strategic allocation includes Phase B3, which is the remaining parcel under the control of Persimmon Homes. A detailed planning application for development on this area of land is well advanced and is likely to be submitted in early 2018. The total number of units to be applied for as part of this phase is circa 250 dwellings
- The remaining residential land forming Phase C is under the control of AC Lloyd. An outline planning application is in the process of being prepared and is likely to be submitted in Spring of 2018. This will deliver in the order of 550 dwellings, to be confirmed by detailed work to support the application and its determination by the Council through the development management process, making up the balance of the circa 800 dwellings overall.
- In terms of the employment land, this is likely to be led by the market. Given the rapid take up of employment land at Rugby Gateway which offers similar locational benefits, it is anticipated that development in this location will come forward in the short to medium term. In this regard, the restrictions on the employment uses and unit sizes set out in Policy DS7 are unhelpful and not conducive to the delivery of development and jobs.

1.2.2 There are currently no formal designations in the extant development plan affecting the planning status of the land the subject of the allocation. The land is countryside immediately adjoining the existing, and proposed, Urban Edge of Rugby. It is understood that following the adoption of the Local Plan the land will form part of a housing allocation within the urban area of Rugby town. There appears, however, to be a cartographical error as the proposed Urban Edge Boundary does not include the entire site as set out within the 'Gateway and Coton Park East – Proposed Urban Edge Boundary, New Open Space designations and New Local Wildlife site designations' and 'Urban Proposals Map'.

1.2.3 The Housing Background Paper sets out the process that was followed in order to identify the most appropriate sites to deliver the dwelling requirement, having regard to all reasonable alternatives. This draws upon and refers to a wide range of evidence prepared to inform the plan making process in Rugby Borough, which collectively demonstrates the suitability of the selected sites.

1.2.4 The Sustainability Appraisal prepared by consultants on behalf of the Council also considers the different site allocation options. It is understood that a total of 188 residential site options were assessed.

1.2.5 To assist the Council, further technical work has been prepared and submitted by Persimmon Homes and AC Lloyd to complement the Council's evidence base in demonstrating suitability, availability and achievability. Given the strategic allocation provides a continuation of current development within the area, there are no development constraints or infrastructure requirements that prevent the site from viably being delivered in the first five years of the plan period following adoption.

1.2.6 Our clients, Persimmon Homes and A C Lloyd, agree that the relevant Policies, and evidence base which supports them, identifying the strategic allocation at Coton Park East have been positively prepared, and are justified, effective and consistent with national policy, subject only to our suggested changes set out below.

***b) What is the likely impact of the proposed development of this site on the following and what measures are proposed to mitigate those impacts?***

***- ecology, biodiversity and green infrastructure***

***- landscape quality and character***

***- agricultural land***

***- heritage assets***

***- strategic and local transport infrastructure***

***- air and water quality and noise pollution***

***- flood risk***

1.2.7 As referred to above, a number of technical documents have been prepared and submitted to the Council that consider these matters. These reports demonstrate that there are no constraints to development in this location.

***c) Is there a justification for additional employment land to be allocated at the site, over and above the 7.5 ha included in Policies DS4 and DS7, to meet overall needs or to support sustainable development?***

1.2.8 In response to questions raised under Matter 2b, we have provided evidence which points to a concern that the Council is not identifying sufficient employment land to meet jobs and economic growth projections and aspirations. The work undertaken to date establishes that the site can accommodate around 11.5 ha of employment land. Any figures in Policy DS5 should be expressed as approximate, and should refer to 11.5 ha. In view of our finding with regard to the overall supply of employment land, this would be beneficial overall and make no difference to the area of land to be allocated.

***d) How would the development of the site and its associated infrastructure be phased to ensure the delivery of a mixed use, sustainable development in line with the Housing Trajectory? What safeguards would there be to secure the provision of infrastructure when it is required?***

1.2.9 As set out within the evidence presented to the Council, there is no associated strategic infrastructure that needs to come forward to facilitate the development of the site. The only obligation identified is a Primary School, which is to be delivered as part of the Phase C development. There is likely, however, to be capacity within the school system to accommodate extra pupils in the interim period prior to Phase C being delivered.

***e) What mechanisms are proposed to ensure the comprehensive delivery of the overall development and its associated infrastructure in line with Policies DS5 and DS7?***

1.2.10 No additional mechanisms are necessary to ensure the comprehensive delivery of the site. As identified above, planning permissions to the south of the proposed strategic allocation have come forward successfully without the support of site specific planning policy. Indeed, the site has been promoted over a significant period and consequently the supporting information and comprehensive, master-

planned approach are at an advanced stage, with all parties keen to work together to ensure the successful delivery of the site.

1.2.11 As identified above, there is a market for development in this location, which has been demonstrated by the continued success of the Coton Park development. In addition, there are no development constraints or infrastructure requirements that prevent the site from viably being delivered in the first five years of the plan period

***f) What are the overall infrastructure costs? What evidence is there that the development would be viable taking into account these and other policy costs, including affordable housing?***

1.2.12 A financial viability appraisal was prepared and submitted in response to earlier stages of the plan making process. Persimmon Homes and AC Lloyd can confirm the development proposal, as previously presented in representations to the Publication Draft Local Plan, can cover the necessary infrastructure costs, including affordable housing, based on the emerging policy requirements and evidence prepared in respect of the site at this stage.

***g) What site preparation and infrastructure works are required to address any physical constraints and open up the site for development? Is it realistic to expect the delivery of the first houses in 2020/21?***

1.2.13 As identified above, there are no physical constraints to developing the site that would require abnormal site preparation and/ or infrastructure works. Indeed, it is envisaged that once Phase B1 has been completed, planning permission can be secured for B2/ B3, allowing a continuation of current development activities. In respect of Phase C, there is an opportunity for this land to be delivered concurrently as the access through Castle Mound Way provides a separate outlet from which other housebuilders can operate, providing potential for a greater number of completions to be achieved early in the plan period.

1.2.14 In terms of delivering completions, it is considered that with a supportive policy framework the first completions can be delivered in a very short timeframe. Indeed, given that Phase B1 is currently in the process of being delivered, there



are commercial benefits to Persimmon Homes to ensure the early determination of future phases to enable the continuation of current construction activities.

***2. Will Policies DS5 and DS7, as proposed to be modified, be effective in securing the delivery of sustainable development at Coton Park East through the planning process? Do they contain the necessary safeguards and requirements to ensure the impacts of the development are appropriately mitigated?***

1.2.15 It is agreed that the policy requirements as set out within the Policies DS5 and DS7 (as amended) provide the necessary safeguards to allow the site to come forward in a sustainable manner and secure appropriate mitigation measures. In addition, the draft Local Plan contains development management policies which will ensure that the resultant proposal delivers sustainable development.

1.2.16 We do object, however, to the proposed 'cap' on the quantum of development that is now being proposed by Rugby Borough Council i.e. 'up to 800 dwellings'. It is understood that this change to the proposed policy for Coton Park East is to provide consistency with all other proposed allocations. As set out in response to the Matter 2a, the expression of a development quantum as a maximum is not in the spirit the Government's stated approach to the delivery of a significant increase in the number of new homes. Instead, this approach would represent an artificial cap on the level of development that could be delivered, removing a key element of plan flexibility.

1.2.17 In light of these comments, it is considered that the quantum of development for both housing and employment should be expressed as approximate figures, allowing the application of development management policies, including those in the Local Plan when adopted, to determine the appropriate eventual capacity of the site. This will assist in providing plan flexibility and provide greater certainty that overall development requirements set out in the plan can be delivered.