



**Please ask for Vicky Chapman**

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### **By email via the Programme Officer**

Dear Mr Hayden,

The purpose of the designation within the South West Rugby allocation is safeguarding of land for either residential or employment beyond the plan period. It is not proposed for development within the 2011-2031 plan period.

Proposed policy DS1 details the growth requirement of employment and housing to meet the needs of the Borough over the plan period 2011-31, as identified in the Strategic Housing Market Assessment (LP08) and the Employment Land Study (LP12). Sufficient land has been proposed for allocation through policies DS3 and DS4 to meet these targets. The proposed safeguarded land is therefore not required to meet the requirements of DS1. It is also not required to deliver the spine road network, as detailed in draft policy DS9 (modifications LP54.46 – LP54.58).

The various evidence that support the plan and the Sustainability Appraisal, assess the growth as proposed in DS3 and DS4. It does not assume additional growth in the proposed safeguarded area. Any potential impacts at this location are therefore unknown, and as such, no additional mitigation is detailed in the IDP attached at Appendix 3 to the Local Plan (proposed modifications LP54.116 – LP54.140).

To deliver the level of growth within the plan, account needs to be taken of the constraints on the existing highway network. The Strategic Transport Assessment (LP 20), undertaken in partnership between Warwickshire County Council and Rugby Borough Council, considered and tested the provision of 5,000 homes and 35 hectares of employment land at the South West of Rugby (as proposed for allocation in DS8). The STA concluded that the level of housing growth exceeds traffic capacity even after some level of mitigation, and as growth is delivered within the plan period. As a result, key pieces of infrastructure become essential in order to ensure that the effects of development are mitigated. Without the provision of the South West Rugby spine road network, as identified in policy DS9 for the South West Rugby allocation, the impact on Dunchurch Crossroads, the gyratory and the wider network in the south would be unacceptable. It concludes that once implemented, performance improves, but with an element of residual delays remaining.

The mitigation is therefore finely balanced to the quantum of development proposed. The impact of any additional housing or employment is likely to create a greater impact on the network.

Safeguarding a portion of the allocation site beyond the plan period would allow time to ensure that development within the South West takes place in managed phases. This would allow time for the network to adapt, for further improvements to the highway network to be identified and provided, so that the overall transport capacity can be managed at a pace which matches highway mitigation and more sustainable transport improvements.

As detailed in the Housing Trajectory (appendix 2 of the Local Plan, modification LP54.114 – 115) housing within the South West Rugby allocation is already expected to build out beyond the plan period. It is therefore proposed that the wording of the safeguarded land in modification LP54.191 is amended to reflect this so that the land is reserved for potential employment growth, if necessary, beyond the plan period. As detailed in the paragraph 4.60, of the Publication Local Plan, there is potential for the growth targets of housing and employment to be revisited as a result of changing demands for the Borough beyond 2031.

Given the proximity of the land to the adjacent Cawston Spinney, this would require the buildings to be of an appropriate scale and proximity to limit their impact on the Cawston Spinney. As such and given the extent of the B8 allocation within the South West Rugby, any employment growth at this location should be limited to appropriate B uses to reduce the impact on Cawston Spinney. This would be explored when growth requirements beyond 2031 are considered.

A further modification is also proposed to update paragraph 4.60 of the Publication Local Plan accordingly to reflect the above as detailed in the table below.

Ref	Policy / Paragraph No.	Proposed Change	Reason for change
	4.60	Insertion of new line at the end of para 4.60: <u>As such an area of land is safeguarded with the South West Rugby allocation, as identified on the Proposals Map.</u>	To reflect inclusion of South West safeguarded area

This is incorporated into the updated modifications table. Please let me know if this is correct.

I hope that this answers the Inspector's questions. Please let me know if he requires any further information.

Yours sincerely,

Vicky Chapman

