

RUGBY BOROUGH LOCAL PLAN EXAMINATION

STAGE 1 HEARINGS

ISSUE 3A: OVERALL DEVELOPMENT STRATEGY

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 does not address all the questions raised by the Inspector, particularly as certain questions are directed specifically to RBC, but provides discussion on some of the key issues that Persimmon Homes and AC Lloyd consider to be particularly relevant to the 'Overall Development Strategy' (Matter 3, Issue 3a), and hopefully assists the Inspector during the examination process. Further site specific comment is set out in respect of Coton Park East as a separate response to Matter 3b.

1.2 QUESTIONS

1. Has the overall development strategy of the RBLP been positively prepared, is it justified as the most appropriate strategy, effective in terms of cross-boundary strategic priorities and will it enable the delivery of sustainable development in accordance with national policy? In particular:

a) Is the settlement hierarchy set out in Policy GP2 justified and consistent with national policy?

1.2.1 Rugby Borough Council has worked jointly with Coventry and the other Warwickshire authorities to prepare a joint Strategic Housing Market Assessment (SHMA). The SHMA has been endorsed by each of the local authorities and a Memorandum of Understanding (MOU) signed by all authorities, except for Nuneaton & Bedworth BC, to ensure the housing needs of the Housing Market Area (HMA) are met in full.

1.2.2 The distribution of housing across the HMA is therefore agreed by the Warwickshire authorities allowing for individual planning authorities to prepare their local plans to meet the needs of the HMA, and include any spatial strategy that will assist with the achievement of sustainable development. The approach to delivering housing across the HMA has recently been endorsed by Inspectors examining the Coventry and Warwick Local Plans and is therefore reasonable to assume - given the findings of the Inspectors - that the approach RBC has taken to meeting needs is justified and effective, having regard to national policy requirements. RBC has proceeded to prepare a development strategy which focuses housing growth to the most sustainable locations within the Borough, an approach which Persimmon Homes and AC Lloyd believe is consistent with the NPPF.

1.2.3 In a similar fashion, the Warwickshire authorities have signed up to an Employment Land Memorandum of Understand (ELMOU) (July 2016) relating to the requirements and distribution of employment land across the county. This confirmed a shortfall of 241 ha of land within Coventry, with an initial 98ha to be delivered in Rugby Borough, through completions and further development at Ansty and Prologis Ryton. This is further explained in the Duty to Cooperate - Statement of Compliance (LP05).

- 1.2.4 Overall it is clear that RBC is assisting in meeting employment needs of Coventry and has prepared a spatial strategy that allows flexibility for the allocated employment sites, including sites in the Green Belt (i.e. Ansty Park and Ryton Prologis Park) to further intensify activities (see Policy ED1 – LP01).
- 1.2.5 Persimmon Homes and AC Lloyd are therefore in general support of the RBLP development strategy, subject to the changes outlined within the Statement of Common Ground (to be submitted prior to hearing sessions) which includes, amongst other things, removing the cap - “up to” reference - on the amount of housing and employment to be delivered within the allocations which is considered necessary, in order to be consistent with the NPPF (paragraph 47).
- 1.2.6 Persimmon Homes and AC Lloyd support the settlement hierarchy as set out under Policy GP2, which focuses housing and employment growth to Rugby.
- 1.2.7 Notably the settlement hierarchy outlined under Policy GP2 is broadly consistent with the adopted Core Strategy (CS) Policy CS1, which was subject to examination in 2011 where it was found by the Inspector to be sound and the most sustainable strategy having regard to alternatives, and therefore consistent with national policy at the time (i.e. PPS1, PPS3 and PPS12).
- 1.2.8 Although the Core Strategy was examined prior to the publication of the NPPF, the achievement of a sustainable pattern of development, including measures to reduce the need to travel by car were still at the forefront of national policy and decision making. There has been no fundamental shift in national policy in this respect which would require the Council to significantly depart from the current settlement hierarchy.
- 1.2.9 The settlement hierarchy as proposed in GP2 is therefore consistent with national policy, and also considered justified in being the most appropriate strategy as evidenced within the Sustainability Appraisal (LP03).

b) How does Policy GP2 deal with development opportunities and pressures arising on the urban edges of Coventry and Hinkley along the borough boundary? Is this justified and would it be effective?

- 1.2.10 As discussed above, the development pressures of Coventry have been considered by the Warwickshire authorities and a strategy for meeting needs across the HMA agreed. It is therefore appropriate for RBC to pursue a spatial

strategy for housing that focuses development towards settlements within the Borough offering the greatest access to services and facilities.

1.2.11 Likewise, the employment requirements of Coventry are considered in the ELMOU (2016), and RBC have agreed to meet some of Coventry's needs (circa 98ha) derived from the spatial distribution agreed within the housing MOU. Sites have been identified under Policy ED1 to meet employment needs of Coventry, and although Policy GP2 does not specifically refer to these locations, it is clear that ED1 offers a degree of flexibility for further development to be accommodated in these locations. It is the view Persimmon Homes and AC Lloyd that this approach is justified. There is clearly co-operation between Coventry City and Rugby Borough, and Policy DS1 of the recently adopted Coventry Local Plan includes a review mechanism to deal with circumstances where needs cannot be met. This may trigger a need to update the housing or employment MOUs and further collaboration with the other Warwickshire authorities will clearly be required as a consequence. The remedy to address any shortfalls or growth requirement, would inevitably be a Local Plan review if need cannot be met in any other way.

1.2.12 With regards to Hinckley & Bosworth Borough Council, the Leicester and Leicestershire Strategic Housing Market Assessment (SHMAA) (June 2014) notes that there are identifiable and important functional interactions with adjoining authorities including Warwickshire, and states that the "*authorities with the strongest localised links should be engaged in considering strategic housing issues not only in the preparation of the SHMA but also the subsequent development of plan policies. This has in part already been established through the preparation of this document and with the request for neighbouring local authorities to comment on it*"¹. The Leicester and Leicestershire SHMA does not specifically flag up interactions with Rugby Borough, but despite this, it is clear from RBC's Duty to Cooperate Statement of Compliance (LP 05) that discussions have taken place between the two authorities with no obvious cross-boundary development pressures that would need to be addressed. It is therefore considered that the Council's approach is justified.

1.2.13 For the reasons given above in response to Question 1a, the settlement hierarchy set out in GP2 is considered justified by the evidence.

¹ Paragraph 9.3 - Leicester and Leicestershire Strategic Housing Market Assessment, June 2014

1.2.14 The settlement hierarchy is also considered effective, in that there is potential within the locations identified to meet the development needs, as set out within Policy DS1 without requiring further settlements or locations to be identified.

c) What is the basis for the overall development strategy contained in Policies GP2, DS3 and DS4 of the RBLP, in terms of the broad location and spatial distribution of development between different settlements and parts of the borough?

1.2.15 As discussed above, Policy GP2 sets out the settlement hierarchy, with Rugby town as the focus for growth as the most sustainable settlement.

1.2.16 Policy DS3 and DS4 deal with the distribution of growth across the settlement hierarchy. The urban edge of Rugby town is the focus for the majority of housing during the plan period, along with all new employment allocations. This includes the proposed allocation of Coton Park East which is capable of providing at least 800 new homes along with approximately 12ha of employment land.

1.2.17 The overall development strategy is largely a continuation of the adopted spatial development strategy which was found to be sound and justified in terms of national policy.

1.2.18 Although delivery of the Core Strategy development strategy was initially slow due to the complexities of the Rugby Radio Station site, it is evident that delivery is now picking up pace and achieving levels originally envisaged for the period 2011 to 2017.

1.2.19 The new Local Plan will cover Phase 2 (2017 – 2031) with higher annual rates but to ensure that the Council maintain a supply of housing they have allocated land above that required to meet OAN. The distribution of housing across the Borough allows for smaller less complicated sites to be brought forward within the Main Rural Settlements, along with the large strategic sites on the edge of Rugby as the most sustainable settlement. It is the contention of Persimmon Homes and AC Lloyd that the development strategy is entirely appropriate and is capable of being effective in terms of meeting the Boroughs needs.

d) Is it justified as the most appropriate development strategy, when considered against the reasonable alternatives? What alternative strategies were considered by the Council in terms of the options for the broad location and spatial distribution of development and why were these discounted?

1.2.20 The September 2016 SA (LP 03) confirms that the Council considered many different growth scenarios at the Issues and Options Stage. This included an option which would have directed some growth to the edge of Coventry as well as an “intensified urban focus” which would have seen very limited growth in rural areas. These options have been tested and a preferred option taken forward based on these findings. Persimmon Homes and AC Lloyd believe that the Council can demonstrate that all reasonable alternatives have been considered and provide explanation as to why some alternatives have been rejected and others proceeded with. This approach is considered justified and sound on this basis.

e) Is the reliance on large scale development through extensions to Rugby and a new settlement justified as the most appropriate way of achieving sustainable development, the supply of new homes and the economic growth of the area? If not, what are the alternatives?

1.2.21 In terms of the locations for development (housing and employment), the focus for growth is on the edge of Rugby, with Rugby Gateway and Rugby Radio Station representing historic allocations that will continue to deliver housing during the new plan period. These sites are delivering housing and employment opportunities so their inclusion is justified.

1.2.22 The Coton Park East (Policy DS7) is identified in the Local Plan as sustainable urban extension to provide 800 dwellings and 7.5 hectares of employment land. Notably, land to the south of the proposed allocation already benefits from planning permission and is under construction. It is therefore a location where growth is already committed and contributing to the Council’s supply.

1.2.23 Persimmon Homes and AC Lloyd support the Council’s strategy, and the identification of large strategic sites on the edge of Rugby, especially Coton Park East.

1.2.24 Large scale housing sites provide the opportunity to design successful places that people want to live and work in, while simultaneously providing a large number of new homes to meet housing needs. The economies of scale mean that large sites are more capable of delivering and improving infrastructure required to support this growth in an integrated and cohesive manner.

f) Does the development strategy provide for the unmet housing and employment land requirements of Coventry in a way which is reasonable to do so and consistent with achieving sustainable development?

1.2.25 As discussed previously, Persimmon Homes and AC Lloyd are of the view that the Council has addressed the needs of Coventry and the approach taken has been agreed with Coventry City Council and the other Warwickshire authorities. It is therefore considered that the development strategy is reasonable and assists with the achievement of sustainable development.

g) Is the selection of Lodge Farm justified as the most appropriate location for a new settlement in preference to the preferred option site at Walsgrave Hill Farm or other options? What is the evidence to support this?

1.2.26 No further comment.

h) What mechanisms are proposed to ensure the comprehensive delivery of the overall development strategy and its associated infrastructure in line with Policies DS5 and Policy DS10?

1.2.27 No further comment.

I) What market evidence is there to support the delivery and development of 80 dwellings a year from 2023/2024 onwards in a rural location, particularly given site's proximity to the other main

***house building outlets in borough at South West Rugby and Rugby
Radio Station?***

1.2.28 No further comment.