

TOWN AND COUNTRY PLANNING ACT 1990

**SUBMISSION IN RESPONSE TO THE EXAMINATION OF THE
RUGBY BOROUGH LOCAL PLAN EXAMINATION**

STAGE 1 HEARING – MATTERS, ISSUES AND QUESTIONS

**STATEMENT – MATTER 3 DEVELOPMENT STRATEGY - ISSUE 3B: STRATEGIC ALLOCATIONS –
LODGE FARM (DS5 AND DS10)**

JANUARY 2018

**ON BEHALF OF DB SYMMETRY, TAYLOR WIMPEY, GALLAGHER ESTATES, RICHBOROUGH
ESTATES LTD AND WARWICKSHIRE COUNTY COUNCIL (PROPERTY SERVICES)**

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1.0 INTRODUCTION

- 1.1. This statement has been prepared on behalf of db symmetry, Taylor Wimpey Uk Ltd, Gallagher Estates, Richborough Estates Ltd, and Warwickshire County Council (Property Services, as a landowner) (hereafter known as the 'parties') in response to the Inspector's Questions in relation to the following hearing session: Issue 3b – Lodge Farm (Policies DS5 and DS10).
- 1.2. The statement is submitted on behalf of parties who all have land interests at the South West Rugby allocation site, which is allocated for 5,000 dwellings and 35 hectares of B8 employment land (policies DS3, DS4, DS5, DS8 and DS9).
- 1.3. Submissions have been made at previous consultations on the draft Local Plan and these representations should be viewed in the context of our previous comments.
- 1.4. Some of the parties have submitted separate statements in response to the Inspector's questions which are site specific and or relevant to that developer/landowner only. These do not conflict with the shared views of the parties expressed in this statement.

2.0 ISSUE 3B – STRATEGIC ALLOCATIONS – LODGE FARM (DS5 AND DS10)

2.1 The Inspector's questions are as follows:

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

d. **How would the development mitigate the impacts of additional traffic generation on the local roads and maximise the use of sustainable modes of travel? What evidence is there that the development could viably support the provision of a direct public transport link between Rugby and Daventry as required in Policy DS10? What would be the nature and frequency of the services?**

2.2. Policy DS10 sets out that delivery at Lodge Farm will be enabled by infrastructure provided as part of South West Rugby, as detailed in Policies DS8 and DS9 and the improvements in the capacity of the local highway network that result from infrastructure investment detailed within those policies and the IDP.

2.3. Accordingly, the acceptability of development at Lodge Farm is dependent on the delivery of the highway infrastructure, namely the spine road network at South West Rugby, to mitigate the impacts of additional traffic generation on local roads.

2.4. Policy DS9, as amended [LP54A] requires the delivery of a spine road network across the South West Rugby allocation comprising three primary new roads:

- the first being the east-west 'Homestead Farm Link' between the A426, south of Cock Robin Wood and the B4429;
- the second from the A45/M45 roundabout to the A4071 at Potford Dam Farm; and
- the third from the B4642, south of the Cawston Extension site connecting on to the new Homestead Farm Link.

2.5. The Local Plan notes that Dunchurch crossroads is 'already at capacity' (Paragraph 4.63) and considers the Homestead Farm Link, in particular, as a solution to this existing problem. Having regard to the location of the Lodge Farm allocation in relation to Dunchurch and its dependency on highway improvements at South West Rugby, we

consider the Homestead Farm Link, and the wider spine road network to be crucial to mitigating the impacts of additional traffic from development at Lodge Farm also.

- 2.6. In recognising the importance of the Homestead Farm Link, the indicative phasing plan in the emerging South West Rugby Masterplan Supplementary Planning Document (SPD) identifies this link and adjacent land parcels at South West Rugby as coming forward early after adoption of the Plan (Local Plan Phase 2, 2016/17 – 2020/21) in order to address the existing problem of Dunchurch crossroads as soon as possible, and enable development across a number of sites to continue in accordance with the Local Plan trajectory.
- 2.7. Having regard to the role of the spine road network in making development at Lodge Farm acceptable, the consortium therefore support the requirement at paragraph 3 of Policy DS10 for developer contributions towards the provision of the spine road network.
- 2.8. The consortium has previously raised concern at the lack of clarity as to how such contributions would be secured, and this is a matter that will need to be addressed by RBC within the wording of policy DS10: Lodge Farm, and the Masterplan SPD once it is finalised in order to inform the determination of future planning applications at Lodge Farm.
- 2.9. Given that development at Lodge Farm relies on the delivery of the spine road network to mitigate some of its highway impacts this Site will not be able to start delivering until the latter stages of the plan period. We consider this should be appropriately reflected in the Council's housing trajectory, and specifically referenced as such within the policy wording.
- 2.10. Additionally, given the importance of the Homestead Farm Link to mitigate the impacts of additional traffic from Lodge Farm, we consider Policy DS9 should be amended to make it clear that development at Lodge Farm will not be supported until such time as the Homestead Link Road is delivered, or it can be proven that the development will not have a severe impact on the highway. This suggested change to policy DS9 is appended to our consortium-wide response to Matter 3b: South West Rugby.

e. Where would be the nearest secondary school be located and how would future residents of the village travel to it?

2.11. Policy DS10 sets out that delivery at Lodge Farm will be enabled by infrastructure provided as part of South West Rugby, as detailed in Policies DS8 and DS9. Policy DS8 includes the provision of at least one secondary school.

2.12. Once built, the secondary school on the South West Rugby allocation will constitute the nearest secondary school to Lodge Farm. We understand from WCC (Education and Learning) that a new secondary school will be required to be opened prior to 1,795 completions on the South West Rugby allocation (circa year 2024/25) to meet the additional demand for secondary school places that will come about as a result of planned development in the Local Plan.

2.13. Thus, it is highly likely that Lodge Farm, when coming forward will be dependent on the delivery of the secondary school at South West Rugby to provide for the required additional school places in order to make development at the site acceptable and sustainable.

2.14. In view of the fact that the existing secondary schools have limited capacity and the secondary school at South West Rugby, once built will be nearest to Lodge Farm and inevitably necessary to make development at Lodge Farm acceptable, we consider Policy DS10 should require proportionate contributions towards the provision of the secondary school as part of the development. The wording of policy DS10 and the Masterplan SPD will need to provide clarity on how such contributions will be secured.

g. What are the overall infrastructure costs of the development, including the contribution to the South West Rugby spine road? What evidence is there that the development would be viable taking into account these and other policy costs, including affordable housing? If not viable, how would the necessary infrastructure be funded to ensure the delivery of the development in line with the requirements of Policy DS10?

- 2.15. Having regard to the role of the spine road network in making development at Lodge Farm acceptable, as Lodge Farm requires the highway capacity that the South West Rugby spine road network will facilitate, we support the requirement in Policy DS10 for developer contributions towards the provision of the spine road network on the basis that these are fair and reasonable in all respects. The wording of policy DS10 and the Masterplan SPD will need to provide clarity on how such contributions will be secured.
- 2.16. As above, in view of the fact that the existing secondary schools have limited capacity and the secondary school at South West Rugby, once built will be nearest to Lodge Farm and inevitably necessary to make development at Lodge Farm acceptable, we consider Policy DS10 should require proportionate contributions towards the provision of the secondary school as part of the development. The wording of policy DS10 and the Masterplan SPD will need to provide clarity on how such contributions will be secured.