RUGBY LOCAL PLAN EXAMINATION
STATEMENT ON BEHALF OF TAYLOR WIMPEY

Matter 3 – Development Strategy

Preamble

1.1. This statement has been prepared by Barton Willmore on behalf of Taylor Wimpey UK Ltd who have land interests (approximately 35 hectares) at the South West Rugby site, which is allocated for 5,000 dwellings and 35 hectares of B8 employment land (policies DS3, DS4, DS5, DS8 and DS9). A red line plan identifying Taylor Wimpey’s land interest is attached at Appendix 1.

1.2. This statement is submitted in response to the Inspector’s Questions in relation to the hearing session: Matter 3, Issue 3b – South West Rugby (Policies DS5, DS8 and DS9).

1.3. Representations have been made to previous consultations on the draft Local Plan and this matter statement should be considered alongside our previous comments.

1.4. This statement should also be read alongside the Statements submitted on behalf of the joint parties who have land interests at South West Rugby, namely Taylor Wimpey UK Limited, db symmetry Ltd, Gallagher Estates Limited, Richborough Estates and Warwickshire County Council (Property Services, as a landowner). These do not conflict with the individual views of Taylor Wimpey expressed in this statement.

Issue 3b: Strategic Allocations – South West Rugby (Policies DS5, DS8 and DS10)

Questions

1. Is the strategic allocation at South West Rugby 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 DS8 and the draft masterplan, to determine the mix of uses proposed, the impacts of the development and the deliverability of the site and its infrastructure and facilities? What is the status of the masterplan SPD?
1.a.1. The joint parties’ statement for matter 3b sets out the current planning status of the site. In summary, land to the south west of Rugby, including Taylor Wimpey’s land interests have an existing planning policy basis through the Core Strategy as a location already identified as a suitable direction for future growth. Whilst it is acknowledged that the Inspector considering the new local plan will need to consider the allocation, it is our belief that there has been no material change in circumstance that would warrant a different outcome i.e. that this allocation is sound and deliverable.

1.a.2. The joint parties’ statement in respect of matter 3b also refers to the site specific assessments that have been undertaken across the entire allocation to underpin Policy DS8. Most notably the Council’s evidence base includes the Strategic Transport Assessments (LP19 and LP20), Strategic Flood Risk Assessment (LP31), Landscape Assessment (LP34) and the Landscape Sensitivity Study (LP35). Taylor Wimpey are generally in support of this evidence base and believe that it supports the allocation of South West Rugby.

1.a.3. The Council have however included the Rainsbrook Valley Landscape Sensitivity Study (LP36) as part of their evidence, and this assessment covers part of the South West Rugby Allocation including Taylor Wimpey’s land interests to the east of Alwyn Road. Taylor Wimpey object to this study as part of the local plan evidence base.

1.a.4. It is our understanding that LP36 was primarily prepared as evidence to support the Council in respect of Section 78 Appeal (Ref: APP/E3715/W/16/3158785) at a site known as land at Barby Lane, Hillmorton. Therefore the context of this assessment is different to local plan production and as a result we consider it to be more appropriate to rely on the more objective 2006 Landscape Study (LP34), which was carried out in the absence of any specific development proposals.

1.a.5. The 2006 Study concludes that the overall landscape sensitivity of the allocated site, including land to the east of Alwyn Road is considered to be ‘moderate’, and the report goes on to advise that the condition and sensitivity of the landscape in this area is ‘declining’. Thus, the landscape sensitivity of the site is suitable for residential development.

1.a.6. It should also be noted that the Rainsbrook Valley Landscape Sensitivity Study was prepared in January 2017, after the Council had already chosen their preferred sites for allocation within the Local Plan. With this in mind we consider the Study has played no
role in informing the local plan process, and Taylor Wimpey (along with other parties) have not until now had the opportunity to comment on this study.

1.a.7. Taylor Wimpey therefore believe that the Council should rely on the 2006 Landscape Assessment (LP34) as the key evidence underpinning the Local Plan. Taylor Wimpey support the findings of the 2006 Assessment; the conclusions of which have informed the site selection process, and so can be relied upon as justification for the preferred development strategy. It is important that the proposed allocations are all subject to the same level of assessment across all disciplines; and in line with the National Planning Policy Framework (NPPF), that the evidence gathered is proportional and relevant.

1.a.8. In respect of site specific assessments Taylor Wimpey have undertaken a considerable amount of technical work in respect of their land interests to support the submission of a full and / or hybrid (part full and part outline) application in 2018, including the following:

- Arboricultural Survey Report
- Archaeological Assessment
- Preliminary Ecological Appraisal
- Ecological Impact Assessments
- Landscape and Visual Impact Assessment (west of Alwyn Road only)
- Phase 1 Environmental Risk Assessment
- Highways scoping

1.a.9. We are in the process of commissioning further technical work in respect of air and noise quality, drainage and flood risk, and landscape impact for land to the east of Alwyn Road to support our proposals. We are working towards the submission of an application in summer 2018.

1.a.10. It is our intention to progress with proposals for all of Taylor Wimpey’s land interests to the east of Alwyn Road and a proportion of their land interests to the west of Alwyn Road, as per the phasing plan at **Appendix 2**.
The site survey work demonstrates that the site is entirely suitable for development and that any impacts can be appropriately mitigated. Further details of the likely impacts of developing the land east and west of Alwyn Road, and proposed mitigation are set out below under our response to question 1b.

b. What is the likely impact of the proposed development of the 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.b.1 Taylor Wimpey has considerable experience in bringing forward strategic sites like the allocation.

1.b.2. As noted above, a suite of technical work has been undertaken in respect of Taylor Wimpey’s land interests to the east and west of Alwyn Road to support the submission of a planning application in 2018. The findings of these, and any suggested mitigation is below.

1.b.3. Detailed work has been undertaken on highways and access, including the Homestead Farm link as detailed in the Homestead Farm Link Road Justification Statement, appended to the Matter 3b joint parties’ statement on the South West Rugby Allocation. The work undertaken thus far confirms there are no significant constraints, and through a combination of mitigation measures and retaining important landscape and habitat features, development could take place without adverse impacts.

1.b.4. An Arboricultural Survey Report was undertaken in March 2017 (by Barton Heyett). The survey reveals that the majority of trees / hedgerows across the sites are of moderate
quality (category B) or low quality (category C), and only a small percentage are of high quality (category A). A total of five trees are protected across both sites.

1.b.5. Having regard to the expanse of Taylor Wimpey’s land interests and the lack of higher quality trees, alongside the opportunities to establish new tree and woodland planting, we are comfortable that any future development proposals on the sites can be designed appropriately to safeguard against any significant impacts. It is not considered that there are any overriding arboricultural constraints that would prevent development of the sites.

1.b.6. An Archaeological Assessment was undertaken in May 2017 (by CSA Environmental), which concludes that the overall archaeological potential of both sites is low.

1.b.7. A Preliminary Ecological Appraisal was undertaken in August 2016 (by CSA Environmental). The appraisal confirms the presence of hedgerows, mature trees, broadleaved woodland and nesting birds as might be expected, however, no overriding constraints to development were identified. The report recommends that ecological enhancement measures are incorporated into future proposals. Such measures can be successfully incorporated.

1.b.8. Further to this, in 2017, Ecological Impact Assessments in respect of bats, badgers and great crested newts were undertaken.

1.b.9. An assessment of the derelict farm buildings adjacent to Little Scotland Farm along with surveys in summer 2016 and spring/summer 2017 has ruled out the presence of roosting bats. Walked transect and static monitoring surveys identified mainly common and widespread bat species which were mostly active along the internal field boundary hedgerows. The retention of hedgerows and mature trees where possible and the creation of new, diverse habitats/planting would appropriately mitigate for any potential impacts to bats at the sites.

1.b.10. A full walkover survey has confirmed that there are no badger setts on the sites. An assessment of all suitable ponds on-site and within 500m has confirmed that there is an absence of great crested newts.

1.b.11. A Landscape and Visual Impact Assessment (LVIA) was undertaken in July 2017 (by CSA Environmental) for the land west of Alwyn Road. The LVIA concludes that residential
development at the site would be entirely in keeping with the landscape character, and would not therefore result in any material landscape or visual effects.

1.b.12. With regards to Flood Risk, the Environment Agency’s mapping confirms that both sites to the east and west of Alwyn Road are located in Flood Zone 1, thereby having less than 1 in 1,000 annual probability of river flooding.

1.b.13. In terms of heritage assets there are no designated heritage assets (as defined in Annex 2 of the National Planning Policy Framework (NPPF)) such as world heritage sites, scheduled monuments, registered parks and gardens or registered battlefields, within the allocation site. Cawston Farm House (Grade II) just off the B4429 (Coventry Road) is the nearest listed building to the allocated site and Cock Robin Cottages (Grade II), Rugby Road is located to the west of the allocation site. No part of the allocation site is within a Conservation Area.

1.b.14. In summary, the technical evidence clearly demonstrates that there are no significant constraints or ‘show stoppers’ to prevent development at the site.

1.b.15. A summary of potential impacts for the wider allocation is also set out in the first draft of a South West Rugby Masterplan Supplementary Planning Document and in the joint parties’ statement for matter 3b.

c. **How would the development mitigate the impacts of additional traffic generation on Dunchurch village and the surrounding roads and maximise the use of sustainable modes of travel?**

1.c.1. The parties’ joint statement sets out in more detail how the development mitigates the impacts of additional traffic generation on Dunchurch village and the surrounding roads and maximises the use of sustainable modes of travel.

1.c.2. The June 2017 STA (LP20) identifies a number of mitigation schemes and confirms which assessment year (2021, 2026 or 2031) they will be need to be delivered. The following schemes relevant to the proposed development have been identified:

- Dunchurch Crossroads – widening and signal timing optimisation (2021);
- South West Link Road – Homestead Farm Link (2026);
1. These highway improvements will increase highway capacity in Dunchurch, before new routes are provided to divert traffic away from the Dunchurch crossroads. In the longer term, these improvements may be supplemented by traffic calming through the centre of Dunchurch to reduce vehicle speeds and support use of the new, alternative routes. New public transport routes, improvements to PRoWs and cycle routes are also proposed to reduce the need to travel by car.

1.c.4. The Homestead Farm Link is routed through Taylor Wimpey’s land interests to the east of Alwyn Road. Taylor Wimpey, alongside the other relevant parties are committed to commencing the delivery of the Homestead Farm Link in Local Plan phase 2 (2016/17 - 2020/21).

1.c.5. Taylor Wimpey, alongside the relevant party members where the Homestead Farm Link traverses have agreed an alignment for the entire length of the Link Road, balancing both ‘technical’ highways design issues, as well as wider policy DS9 design requirements. A statement providing justification for the chosen alignment of the Homestead Farm Link Road has been prepared and is appended to the joint hearing statement in response to Matter 3b: South West Rugby.

1.c.6. Taylor Wimpey are exploring the options available to secure delivery of the Homestead Farm Link with the relevant parties and key stakeholders. The main options are the submission of a full planning application for the entire length of the Homestead Link Road, or the submission of a hybrid planning application by each of the Homestead Link Road parties; comprising a full planning application for access and a section of Homestead Farm Link through the respective party’s site and an outline planning application for the residential development proposals within the site. In respect of Taylor Wimpey’s land interests east of Alwyn Road, given their status as a housebuilder, a full planning application could be progressed for the Homestead Farm Link and its development proposals.

1.c.7. Given the relationship of Taylor Wimpey’s land to existing residential properties on Alwyn Road and Montague Road, we recognise the opportunity to provide high quality, usable pedestrian and cycle linkages between the developments to maximise the use of sustainable modes of travel.
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 and employment land requirements? What safeguards would there be to secure the provision of infrastructure when it is required?

1.d.1. The parties have jointly worked together to produce a Draft Illustrative Framework Masterplan and an Indicative Phasing Plan for the proposed allocation which are appended to the joint parties’ statement.

1.d.2. Taylor Wimpey agree with the principles of the Draft Illustrative Framework Masterplan in terms of the proposed mix of uses and infrastructure requirements across the allocation.

1.d.3. In respect of phasing, Taylor Wimpey recognise the need for development to be phased to allow for the necessary infrastructure to be delivered at the right time to promote sustainable development.

1.d.4. Having regard to the need for the Homestead Farm Link to mitigate the impacts of additional traffic generation on Dunchurch village and the surrounding roads by circa 2026 (STA June 2017), Taylor Wimpey are fully supportive of the inclusion of their land interests to the east of Alwyn Road being included in the first phase of development (Local Plan phase 2 commencement dates 2016/17 - 2020/21).

1.d.5. However, in respect of Taylor Wimpey’s land interests to the west of Alwyn Road, they do not agree with the indicative phasing plan submitted by the other parties of the South West Rugby allocation (appended to the matter 3b statement) and supported by the Council, which indicates that development here would not commence until Local Plan phase 3 (2021/22 - 2025/26).

1.d.6. Given the relationship of the land to the west of Alwyn Road to existing residential properties, and the status of Taylor Wimpey as the only housebuilder within the consortium - with the capacity to submit and obtain full planning permissions, and commence development without delay, we propose that a proportion of the land west of Alwyn Road is included in Local Plan phase 2 (2016/18 - 2020/21).

1.d.7. This would allow for an application to be progressed which comprises of both land to the east and west of Alwyn Road.
The inclusion of this land in phase 2 would not prejudice delivery of the Homestead Farm Link as per the requirements of policy DS9 since the Council would have the ability to attach a Grampian condition, if necessary to any permission; limiting the number dwellings that can be occupied until the necessary infrastructure is in place.

1.d.8. For these reasons we request that the indicative phasing plan be amended to include a proportion of Taylor Wimpey’s land to the west of Alwyn Road into Local Plan phase 2, alongside the identified land to the east of Alwyn Road. This land would involve the delivery of a further circa 250 dwellings in phase 2. At Appendix 2 we append our proposed indicative phasing plan.

e. Given that the site is in multiple ownership, what mechanisms are proposed to ensure the comprehensive delivery of the overall development and its associated infrastructure in line with the masterplan and Policies DS5 and DS8?

1.e.1. The parties have jointly worked together to produce and agree a Draft Illustrative Framework Masterplan and Phasing Plan, (which Taylor Wimpey agree to in-principle so far as it relates to delivery of the Homestead Link for the proposed allocation). The final South West Rugby Masterplan SPD will contain the Illustrative Framework Masterplan and a Phasing Plan, and will supplement the Local Plan in adding detail to the policy framework to guide determination of planning applications and Section 106 Agreement obligations that will ensure the comprehensive delivery of the South West Rugby allocation and its infrastructure.

1.e.2. As discussed, Taylor Wimpey are committed to ensuring that the link road is delivered through their land interest as soon as possible and are collaboratively working with relevant parties to ensure that the link road is delivered to a consistent set of details and to avoid a ransom situation.

1.e.3. Taylor Wimpey are collaborating closely with Richborough - who control land between the Taylor Wimpey land east of Alwyn Road and A426 to the east - in particular regarding the delivery of the Homestead Link between Rugby Road and Alwyn Road.

1.e.4. Both parties recognise the importance of connecting this first section of highway infrastructure and are discussing the most appropriate way to secure permission for the
detail of the road alignment to provide certainty regarding its design and layout of the route.

1.e.5. It is also of note that the majority of the route of the Homestead Link runs through land that is under the control of a public body (Warwickshire County Council). Consequently, there should be little risk of complications delivering this key highway infrastructure where doing so is in the public interest, and where the authority is also the local highways authority.

f. **What are the overall infrastructure costs, including 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 Policies DS8 and DS9?**

1.f.1. The approved applications within the South West Rugby allocation and the recently submitted db symmetry Ltd application for employment uses demonstrate the viability of the South West Rugby allocation site.

1.f.2. We are of the view that Taylor Wimpey’s land is viable and deliverable. The technical work undertaken in respect of their greenfield land interests demonstrate that there are no significant constraints or abnormalities on their land that would prevent development, or would render it unviable and therefore undeliverable. This has taken into account the likely infrastructure costs so far as they can be defined at this stage of the process.

1.f.3. Furthermore the site is in the control of a national housebuilder who is very active in the local market with a proven rate of delivery within the housing market area.

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

1.g.1. As the allocation is predominantly agricultural greenfield land, there are no significant site preparation works anticipated.
1.g.2. As outline planning permission has been granted for two sites within the site allocation area (Bilton Fields, Ashlawn Road and Meadow Farm), it is entirely realistic to expect delivery of the first houses in 2020/21 and this is reflected in the trajectory and phasing plan. By way of example, first completions on Bilton Fields Farm are anticipated in 2019/2020.

1.g.3. Taylor Wimpey’s land interests to the east and west of Alwyn Road adjoin existing residential development which facilitates development on their land during the earlier phases of the Plan.

2. Will Policies DS5, DS8 and DS9, as proposed to be modified, be effective in securing the delivery of sustainable development at South West Rugby through the planning process? Do they contain the necessary safeguards and requirements to ensure the impacts of the development are appropriately mitigated?

2.1 Notwithstanding the support in principle for the proposed South West Rugby allocation, the joint parties’ statement requests further changes to policies DS8 and DS9.

2.2 In addition to the suggested changes referred to above we consider that the capacity of the South West Rugby site, currently expressed as ‘up to 5,000 dwelling’ should be expressed as a minimum figure. Paragraph 14 of the Framework requires that for plan making, the Local Plan should meet objectively assessed needs, with sufficient flexibility to adapt to rapid changes. The inclusion of a minimum housing figure would ensure that the policy is positively prepared, effective and consistent with national policy, and ensure flexibility.
APPENDIX 1
Taylor Wimpey Site Boundary Plan
APPENDIX 2
Indicative Phasing Plan
Phase 2 - Employment
(2016/17 to 2020/21)

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Policy DS8 Allocation Boundary

Residential Phasing
(Phasing denotes time period in which development commences)

- Consented Application Sites
- Phase 2 (2016/17 to 2020/21)
- Phase 3 (2021/22 to 2025/26)
- Safeguarded Land for Future Residential or Employment Uses
- Phase 2 - Employment (2016/17 to 2020/21)

Project
South West Rugby

Drawing Title
Indicative Phasing Plan

Date
Jan 2017

Scale
NTS

Drawn by
M.S.

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S.G.

Revision
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