

RUGBY BOROUGH LOCAL PLAN EXAMINATION

STATEMENT ON BEHALF OF MR. R CHALCRAFT

Matter 4: Non-strategic Housing Allocations at Main Rural Settlements and Coton House (Policies DS3 and DS6)

Issue 4b: Site Specific Issues for the MRS and Coton House Allocations

1. Introduction

- 1.1 This statement has been prepared by CC Town Planning on behalf of Mr. R Chalcraft who is the owner of the site known as 'land off Squires Road, Stretton on Dunsmore' (DS3.11), which is allocated for residential development (up to 50 dwellings) within Policy DS3 of the Rugby Borough Local Plan (LP).
 - 1.2 This statement responds to the Inspector's Questions in relation to Matter 4 – Non-strategic Housing Allocations at Main Rural Settlements and Coton House (Policies DS3 and DS6).
 - 1.3 Representations have been made on behalf of Mr. Chalcraft to those previous consultation stages conducted by Rugby Borough Council (RBC) on the draft Local Plan and the following should be read in conjunction with those previous submissions.
 - 1.4 The following seeks to directly address those questions raised by the Inspector under Matter 4 which are relevant to the land interests of the representor.
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Issue 4b: Site Specific Issues for the MRS and Coton House Allocations.

Q 1. Are the proposed residential allocations at the Main Rural Settlements (MRS) identified in Policy DS3 justified as the most appropriate sites when considered against all reasonable alternatives and would they be consistent with national policy, with particular regard to the following for each site:

(a) The effect of development on the purposes of the Green Belt as set out in paragraph 80 of the NPPF?

- 2.1 The Council has afforded their full and thorough consideration of the effect of the proposed development at DS3.11 on the purposes of the Green Belt as set out at paragraph 80 of the NPPF.
- 2.2 In terms of harm, and in specific regard to DS3.11, the site does not serve to restrict the outward expansion of either Rugby, to the east or Coventry to the west. It lies well beyond the built-up extent of either urban area and performs no role in checking their unrestricted sprawl. Furthermore, the site does not serve as a 'gap' (or break) between two or more definable settlements and as such provides no contribution to the prevention of neighbouring towns from merging. Therefore, site serves little purpose in relation to first and second bullet points of Para 80 of the National Planning Policy Framework (NPPF).
- 2.3 It is acknowledged that the site is currently recognised as a countryside location on the edge of Stretton on Dunsmore. Any development, by necessity, will result in encroachment on the countryside.
- 2.4 However, it is important to consider the level of encroachment that will occur and other factors which may detract from the quality and function of the countryside at this location. The site is Grade 3 agricultural land and therefore not excellent quality, it is not subject to any landscape or ecological designations which might otherwise contribute to the quality of the countryside at this location and the site is also enclosed, to the south and east, by built form. Planting to the west and northern boundaries of the site benefits the site a definable boundary features which isolates the site from the open countryside. These matters are also considered later within this statement.
- 2.5 The site does not serve to contribute towards the preservation of a historic setting and consequently is not capable of contributing to the fourth purpose of the Green Belt as set out at Para 80 of the NPPF.

- 2.6 The social, economic and environmental benefits associated with the delivery of a residential development at DS3.11 are significant. Under the overall heading Delivering Sustainable Development, Section 9 of the NPPF clearly provides the basis for Green Belts to be reviewed and amended through the preparation or review of a local plan.
- 2.7 It is considered that the commentary and findings set out within the evidence base which has supported the production of the LP is considered to provide robust justification for the amendments to the Green Belt boundary within Rugby Borough to allow for the allocation of sites such as DS3.11 for residential development.

(b) Whether the resulting Green Belt boundaries would be clearly defined using physical features that are readily recognisable?

- 2.8 The Council have afforded their full consideration to the physical and topographical features of site DS3.11 and the evidence base is conclusive that the site is clearly defined and delineated by features which are both long established and readily recognisable.
- 2.9 The site lies immediately to the north of existing residential properties on Squires Road, it is from this point (on the southern boundary of the site) that access will be taken directly from the existing highway.
- 2.10 To the east of the site lies Knightlow Church of England Primary School, the grounds of which directly abut the eastern flank of DS3.11. The boundary between DS3.11 and the school is delineated by a mature hedgerow and sporadic treeline.
- 2.11 To the north and west lies agricultural land, however DS3.11 is separated from these 'open' agricultural fields by a significant tree line on the western boundary and a mature hedgerow and tree coverage along the northern boundary.

2.12 The existing settlement edge of Stretton on Dunsmore is 'indented' in this north-west extremity and it is therefore considered that the site is framed by long established, mature, readily recognisable features which border the site on all sides.

(c) The effect of development on landscape character, heritage, biodiversity, agricultural land, flood risk, highway safety, infrastructure and facilities?

2.11 The evidence base which has supported the production of the LP has been critically considered by the Council to ensure that the most appropriate sites in sustainable locations are allocated for future development.

2.12 An outline application for residential development at the site was submitted to RBC in 2013 (Ref: R13/0250), that application was refused due to the site being located in the Green Belt and due to the lack of a great crested newt survey having been undertaken. It must be noted that there were no other technical reasons for refusal and no technical objections raised during the course of the planning application. Of note, for the site to be allocated through the LP, there is no requirement for such a survey to be undertaken and this matter will be dealt with through the development management process.

2.13 By necessity, there will be impacts as a result of development at the site. However, in the case of DS3.11 and other MRS allocations, those which are allocated through DS3.11 are the most appropriate after consideration has been afforded to all other reasonable alternatives.

2.14 The Stretton on Dunsmore Site Allocations Development Pack (LP48) provides commentary in regard to each of those areas highlighted within Q1(c) of this Issue.

2.15 For clarity, the site is not subject to any special landscape designations and the RBC Landscape Sensitivity Study (2016) (LP35) concludes that the site is appropriate for development providing a substantial landscape buffer of native trees and shrubs is planted along the western and northern edges and that the settlement edges are indented. Such planting will form part of any forthcoming planning application and work has commenced in this respect.

- 2.16 The site is not subject to any ecological or biodiversity designations. The site is currently in arable use and it is considered that any potential ecological assets will be constrained to those hedgerows and trees which bound the site. Any future planning application will be accompanied by a full ecological appraisal which will inform any mitigate measures which may or may not be required at the site. For clarity, an ecological assessment is being progressed for the site.
- 2.17 There are no heritage assets either within or adjacent to the site and any planning application will be supported by appropriate information in respect of archaeology.
- 2.18 The site is Grade 3 agricultural land and therefore through allocating DS3.11 the LP will cause the loss of agricultural land of the highest quality.
- 2.19 Access to the site will be taken from Squires Road to the south which is an existing residential cul-de-sac. Access to the site will be largely similar to that which was set out within the 2013 planning application, in that case there was no objection from the Local Highways Authority (LHA). During the production of the evidence base to support the LP, RBC have confirmation from the LHA, as set out within LP48 that *'the Highways Authority considers the proposed access to be suitable'*.
- 2.20 The site falls within Flood Zone 1 as identified on the Environment Agency Flood Map for planning. The Councils Strategic Flood Risk Assessment which has supported the production of the LP, confirms that the site is at low risk of flooding. A Flood Risk report has been produced for the site, which accounts for a higher quantum of development, than the 'up to 50' stated through DS3.11. This initial technical work confirms that; the site is in an area at least risk from flooding; residential development at the site will not increase flood risk elsewhere and that surface water can be effectively managed on site. A flood risk assessment will accompany any future planning application for residential development at the site.
- 2.21 Residential development at the site will serve to enhance the vitality, viability and the range of infrastructure, services and facilities within both the settlement and wider Borough. Full consideration has been afforded to Policy DS4 and those obligations which may arise to mitigate

against the impacts of any future development at the site and the content of this policy will inform any future planning application.

(d) The relationship of the site to the existing settlement and its accessibility to local services and facilities?

2.22 The site lies within the 'indented' settlement boundary on the north-western edge of Stretton on Dunsmore and therefore, being directly adjacent, is considered to have a strong relationship to the existing settlement.

2.23 In terms of accessibility to local services and facilities, the site lies within walking distance of all of those services within the MRS. LP48 sets out those key services which the settlement has to offer (namely; village hall, convenience shop, primary school, surgery, post office and bus stop), the furthest key service (surgery) lies 740m from the site, when measured by walking distance and not as the crow flies, and therefore the site can be considered to be sustainable.

(e) The evidence to support the site's 'deliverability' as defined in footnote 11 of the NPPF?

2.24 The landowner is committed to the delivery of this site, as evidence by the 2013 planning application, continued engagement in the plan making process between 2013 and 2018 and the submission of a pre-application advice request in late 2017.

2.25 The site is immediately available and under the single ownership of the representor and there are no-technical barriers which would preclude its development. The combination of these various factors, including the landowner's appetite to immediately develop the site, demonstrate that the site is immediately available and with a high prospect that residential development will be delivered in the next 1-5 years.

2.26 The site offers a suitable and sustainable location for development, the allocation of the site for residential development has been robustly justified through the Council's evidence base and

this has been discussed at length both herein and within our previous submissions to the plan production process.

2.17 Therefore, for the reasons set out above, it is considered that the evidence is sufficient to demonstrate that site is deliverable in the terms identified at footnote 11 of the NPPF.

3 Their viability having regard to the provision of any infrastructure, affordable housing and other policy requirements?

2.18 The National Planning Policy Framework (NPPF) introduced a clear requirement to assess viability of the delivery of Local Plans and the impact on development of policies contained within them.

2.19 Feasibility work in respect of the site has been ongoing for a significant period and a formal pre-application engagement with the Council commenced on 28th September 2017 under reference R17/1767.

2.20 The advice received to this point afforded opinions on an indicative layout, but more importantly guidance on those policies, from the emerging LP, which would need to be considered through any forthcoming application.

2.21 Whilst it is understood that the precise level of those obligations arising from a development at the site will emerge during the planning application consultation process, it can be confirmed that the site will support the onsite delivery and requisite contributions towards affordable housing, infrastructure and services including, where appropriate, local community facilities which may be requested by the Parish Council.