

## **RBC Response to the Draft Proposed Statement of Common Ground between AC Lloyd & Neyland Properties Ltd on the Coton Park East Allocation**

### **Introduction**

This note forms the council's response to the Statement of Common Ground (SoCG) between AC Lloyd and Neyland Properties in respect of the Coton Park East allocation as proposed through DS7. The justification for the proposed allocation at Coton Park East is contained within the evidence to support the Local Plan and summarised mainly in the council's statement to the Matter 3b Hearing on Development Strategy, but also in the council's statement to matters 2b and 7 respectively. As such they will not be repeated in this note.

### **Background to Allocation**

Policy DS7 in the Draft Submission Local Plan (as amended by LP54A) sets out a requirement for 7.5ha of employment land which should be provided to meet the qualitative need for smaller units as identified in the Employment Land Study (LP12). DS7 requires that units should be provided within a size range of 5000 to 50,000 sq ft and should be in B1c, B2 and ancillary B8 employment uses.

The evidence on the requirement and location for these units has been provided by RBC in their statements on matters 2b and 7 and is also detailed in the Employment Background Paper (LP17) and therefore there is no need to repeat these in further detail in this response note.

### **Site Promoters' SOCG and Proposed Masterplan**

The SOCG between AC Lloyd and Neyland Properties makes comment on the DS7 specification of size and range of employment uses to be provided at Coton Park East in reference to existing provision within Rugby.

The provision of units to meet the demand for SMEs was an important output of the Employment Land Study (LP12). This was further supported through comments provided from the Warwickshire County Council Economics Team who stated that there was a specific need for design and build units for SMEs within Rugby.

The location of these units at Coton Park East was also recommended in the Employment Land Study (LP12) as this was linked to the mix of existing uses along Central Park.

The SOCG states that 15Ha of employment land can be achieved onsite and that this is consistent with the conclusions of LP12 (Employment Land Study) and ensure flexibility in accordance with provisions of the NPPF. The council's statements to matters 2b and 3b detail the justification for the overall employment target as set out in DS4 for Coton Park East and will not be repeated here. However, there is no identified need for an uplift in employment allocation at Coton Park East from what is proposed in DS7. OTH21 sets out the Coventry and Warwickshire Sub-regional Employment Need and Local Plan targets. This shows that both Rugby and the wider sub-region are providing a quantum of employment above the need. Sufficient flexibility in employment growth is therefore demonstrated. As such there is no strategic need to move away from the position agreed in the Employment Memorandum of Understanding (as appended to LP05). Furthermore the potential impact of an increase in employment land at Coton Park East has not been tested through the Local Plan process and therefore are unknown.

The council does not believe that the masterplan appended to the SoCG demonstrates that 15ha of employment land and 800 homes can be accommodated on the site. Under policy SDC1 it will be down

to the development management process to ascertain whether any proposed density for residential dwellings is appropriate.

As well as this the site will need to accommodate adequate open space provision in line with HS4, protection for the Great Central Railway Local Nature Reserve in line with DS7, NE1 and NE2 and appropriate onsite landscaping in line with SDC2 to accommodate onsite constraints.

### **Summary**

For the reasons set out above RBC cannot support the proposal as set out in the SoCG and identified on the masterplan as this is not consistent with the policy aspirations as set out in DS7. The potential impacts of the proposed increase in growth of the employment land are unknown and untested. There is no justification for the proposed increase in the employment land as demonstrated through OTH21.