

## Rugby Borough Council Local Plan Final Briefing – June 2017

### Correspondence to Councillors and Officer Responses

#### Walsgrave Hill Development

Developers Roxhill wrote to all Rugby Borough Councillors in April 2017 setting out proposals for a mixed use development at Walsgrave Hill. As part of the communication Roxhill provided an illustrative masterplan incorporating land proposed for allocation within Coventry City Council's City Plan that lies within the City Council boundary and the land at Walsgrave Hill that Roxhill are promoting for allocation within the Rugby Borough Local Plan. The A46 (Coventry Eastern Bypass) forms the boundary between Coventry City and Rugby Borough. The Rugby Borough Council Publication Draft Local Plan does not propose allocation at Walsgrave Hill.

In addition to the illustrative masterplan Roxhill include a 'comment and response' section regarding their proposal at Walsgrave Hill. The below table lists those questions and Roxhill's responses. Rugby Borough Council officer responses to each of the questions are listed underneath.

<b>Question</b>
<b>Is this site in the Green Belt?</b>
<b>Roxhill Response</b>
Yes, but the land is assessed as low value due to the surrounding uses and the contained nature of the site. It is surrounded by existing development including the Coventry urban area, the A46, M6, Ansty Business Park and Coombe Fields industrial estate together with well established woodland. The new local plan is an opportunity to review the green belt to ensure the best possible future development of RBC.
<b>Rugby Borough Council Officer Response</b>
The Council undertook a Green Belt review with the Coventry & Warwickshire authorities to assess whether the Green Belt still performs its role against the 5 purposes of the Green Belt.  The study split the Green Belt into parcels and broad areas. The Walsgrave Hill site is entirely sited within parcel C7 which is wholly open with the exception of the farm complex which is centrally located in the parcel. The study states that development of the parcel would constitute encroachment of the countryside though it is acknowledged that Coombe pool helps to prevent encroachment of the wider countryside to the south of the site. The Green Belt assessment scores the parcel against each of the 5 purposes and the site overall score is 12/20. The Study identifies that the parcel's Green Belt performance is of medium value (high value parcel scores 20/20 and low value parcel scores 04/20). It is therefore viewed that the site is not considered to be of low value and the study does not recommend that the site should be removed from the designated Green Belt.

Whilst the new Local Plan can make alterations to the Green Belt this can only be done in exceptional circumstances. The site is adjacent to Coventry City, where the Local Plan is planning for 2,800 dwellings of the City's housing need, but there are constraints to the site such as access and heritage (that are explored further below in the Q & A's) which give rise to deliverability and sustainability concerns for the site. Further to this the Local Plan contains sufficient housing and employment allocations to meet the strategic targets which negates the need for the site thus there are no exceptional circumstances present to justify the site's release from the Green Belt.

#### **Question**

**The Scheme requires a huge amount of infrastructure and road improvements, who is paying for this?**

#### **Roxhill Response**

The project will be financed by Roxhill and Segro plc, a £4 billion UK Property REIT, the commercial developer who constructed Rugby Gateway (the new industrial scheme at Junction 1, M6). Highways England has also offered to match fund the improvement works to the Walsgrave roundabout/junction whilst upgrading the Binley roundabout.

#### **Rugby Borough Council Officer Response**

Roxhill submitted a letter to Highway England about their proposed mixed use development at Walsgrave Hill off the A46.

Below is Highway England's response to Roxhill –

*" I note you reference that the scheme can be delivered through the upgrade of the current Walsgrave roundabout on the A46. A highways improvement that is backed by Highways England who has agreed to match fund the development 50% of this cost.*

*Following a review of delivery timescales there has been some movement in our Delivery Plan. The Walsgrave grade separation scheme proposed to accompany Walsgrave Hill Farm is no longer in programme for delivery in the Roads Investment Strategy (RIS) 1 period of 2015 -2020. We continue to promote the need for a scheme as part of the RIS 2 (2020-2025) process. However, there is no certainty that a scheme will secure RIS2 funding."*

Highway England's response clearly demonstrates that the upgrade of the Walsgrave roundabout which will help enable access to the site is not a committed scheme. This means that the scheme cannot be delivered alongside Binley roundabout (which is a committed RIS 1 period scheme) as proclaimed, which is scheduled to commence Spring 2020 ending Spring 2022. As Highways England has no funding in place this dispels that there is a match funding arrangement in place.

**Question**

**What happens to the listed farmhouse close to the Walsgrave roundabout?**

**Roxhill Response**

The listed building would be relocated within close proximity of its current location.

**Rugby Borough Council Officer Response**

Roxhill's representation to the Publication Draft included a Heritage Briefing Note. The note looked at heritage assets within Rugby Borough's administrative area thus it neglects consideration of the proposals impact on Hungerley Hall Farmhouse Grade II Listed building as a result of the access arrangements for the site. The masterplan fails to identify where the listed building will be relocated and how its setting would be enhanced. No evidence has been provided that Historic England would support the approach being taken.

**Question**

**The entrance to University Hospital is already very busy and congested with traffic- car parking is terrible – how will the scheme affect that?**

**Roxhill Response**

The new road layout created off the A46 for Walsgrave Hill will provide a new access into University Hospital – crucially for “blue light” traffic as well as opening up land for significantly more car parking.

**Rugby Borough Council Officer Response**

The Walsgrave Hill Farm site as displayed in Roxhill's Masterplan entails the development of 900 dwellings within the administrative boundary of Coventry City Council. The City part of the site is a proposed allocation in Coventry's Local Plan which is currently at the latter stages of its independent examination.

Coventry City's Local Plan states that the Walsgrave Hill Farm allocation will incorporate blue light access linking the A46 to the University Hospital. The site and blue light access were also previously identified within Coventry City Council's Core Strategy in 2009, which the Council did not endorse following its examination.

It is clear that the delivery of the blue light access is reliant on the Walsgrave Hill Farm housing allocation within Coventry City Council which will require a new access off the A46, irrespective of

whether development occurs within the administrative boundary of Rugby. It is through the main road through the Coventry allocation that access will be gained to the hospital.

Therefore it is viewed that development within the administrative area of Rugby does not impact on the University Hospital blue light access or additional car parking.

#### **Question**

**The houses seem very close to Coombe Abbey and its Site of Specific Interest – will this proposal be detrimental to these two features?**

#### **Roxhill Response**

No, land within Coombe Abbey and the SSSI will not be infringed or changed by this proposal. The site is already well screened by an established belt of landscaping and mature trees and it is proposed that a further 50m wide landscape buffer is created to limit intervisibility.

#### **Rugby Borough Council Officer Response**

Roxhill's Heritage Briefing Note was shared with Historic England with the following response being received.

"Significant, though not exclusive, national policy considerations include, that development will be expected to avoid or minimise conflict between any heritage asset's conservation and any aspect of the proposal (NPPF Para 129); and that harm should always be avoided in the first instance. Only where this is not possible should mitigation be considered (NPPF Para 152). Any such mitigation needs to be fully justified and evidenced to ensure they will be successful in reducing harm.

Importantly we note that RPS/CGMS accept that the Heritage Briefing Note is an initial assessment and does not, for example, apply the rigour of the methodology offered by *The Setting of Heritage Assets* (GPA3 HE March 2015), or indeed (probably), *The Historic Environment and Site Allocations in Local Plans* (HE Advice Note 3, October 2015). The weight that one may attach to the Report's conclusions must therefore be qualified.

An illustration of the Heritage Briefing Note's limitations is the absence of a consideration of the significance of the Grade II\* Park in respect of the perimeter drive indicated by the first edition Ordnance Survey and subsequent mapping, and as mentioned in the description of the park on the register (that is to say on the north and west sides of the park against which the suggested allocation is located). These were a common feature of Capability Browne's landscapes and they were usually intended to afford views into the park and out into the surrounding landscape.

Mindful of the Heritage Briefing Note's accepted weaknesses Historic England does not afford the degree of confidence applied to the statement in the Report at paragraph 3.11 that dense planting

will mitigate harm to the setting of the Grade II\* Park, or is persuaded by the view that the presence of some development in the setting provides a justification for further intrusions. Consequently we do not consider that a robust or convincing case has been made to justify the harm that is likely to be caused to the significance of the affected heritage assets.”

Given the view provided by Historic England, it is officer’s views that the masterplan has not addressed the heritage impacts, or how they can be overcome.

With regard Coombe Pool Site of Special Scientific Interest (SSSI), contact was made with Natural England to review Roxhill’s Ecology Summary and consider whether the buffer would be an appropriate buffer. Unfortunately Natural England responded “as the development now falls outside the statutory consultation process this is a request for Natural England’s input on a pre-app/site viability basis and in these circumstances Natural England charges for our input via our Discretionary Advice Service (DAS). Natural England has introduced DAS so that we can work with applicants, developers, consultants to take appropriate account of environmental considerations at an early stage of the process in order to improve the quality of applications before they are submitted.”

At this stage in time therefore we are unable to comment whether the 50m wide landscape buffer is sufficient or not to mitigate for any adverse impacts on the Coombe Pool SSSI.

**Question**

**Do we need more commercial/employment land?**

**Roxhill Response**

Yes. The LEP and Chamber of Commerce agree. Existing sites will simply not satisfy demand so unless additional land is made available the economic growth of the area will be constrained. The rapid occupation of the buildings at Rugby Gateway (at Junction 1) and the substantial growth of regional companies such as JLR are good examples of the need for further employment space which will provide RBC with much more needed business rates income.

**Rugby Borough Council Officer Response**

The Local Plan sets out that the minimum employment target is 110 ha for the period 2011- 2031. This was informed by the Employment Land Study 2015, which assessed the need for and supply of employment land in the Borough within the plan period. The Local Plan proposes the allocation of 58.5 hectares of employment land to ensure that the full employment target for the local plan period is met. This is consistent to the approach taken by Coventry City Council and the other Warwickshire authorities ensuring that there is sufficient employment allocation to meet the required need identified.

The National Planning Policy Framework requires that Local Plans align their housing and employment targets. This is something that local planning authorities have come unstuck on at

examination. The Local Plan Employment Background Paper details the alignment of the Local Plan employment and housing targets. If the Local Plan were to include the extent of employment proposed by Roxhill, this would likely require an additional housing site to ensure the local plan can demonstrate sustainable development that seeks to reduce commuting. This would see the Local Plan housing target increase. Should the Local Plan allocate a further employment this would mean that the housing target would need to be uplifted.