

## **RUGBY LOCAL PLAN PREFERRED OPTIONS.**

### **RESPONSE TO THE CONSULTATION BY NEWTON & BIGGIN PARISH COUNCIL.**

#### **INTRODUCTION**

The following is the response of the Parish Council to the consultation. Individual residents will be submitting their own views. The Parish Council's views may, in some cases, not align with those of individuals. This does not suggest a disagreement rather that the Parish Council is taking a wider view of the proposals whereas as individuals will, correctly, wish to reflect their individual interests and experiences.

There is much in the Preferred Options with which the Parish Council is in agreement or which lie outside its areas of interest - policies relating to the town centre, tree cover, renewable energy etc. The response therefore is based on 'exception reporting' ie relating to those proposals where the Parish Council finds itself in disagreement.

#### **OVERALL STRATEGY.**

RBC's housing strategy is based on 'dispersal'. The reasoning for this would appear to be a belief that a relatively large number of smaller sites will deliver housing at a faster rate than a smaller number of larger sites. However, larger sites deliver the infrastructure improvements that are missing in smaller developments - highway improvements, education, health, recreation etc. This is reflected in the National Planning Policy Framework (NPPF) which in Para 77 says -

"The supply of large numbers of new homes can often be best achieved through planning for larger scale developments...."

The NPPF also promotes planning for small sites. Para 73 says -

"Small and medium sized sites can make an important contribution to meeting the housing requirements of an area, are essential for SME housebuilders to deliver new homes and are often built out relatively quickly"

To achieve this the NPPF goes on to state that plans should include -

"...land to accommodate at least 10% of their housing requirements on sites no larger than 1ha....."

There is no evidence that the Preferred Options meet this requirement.

In its draft allocations RBC appears to be neither allocating small sites that can be developed quickly nor large sites that can deliver infrastructure.

It would also appear that RBC is departing from NPPF guidance in seeking to allocate substantial developments within the Green Belt without demonstrating that alternatives are not available. No doubt this issue will be pursued by those communities directly affected.

## STRATEGY - NEWTON & BIGGIN PARISH.

The Preferred Options begins with a chapter on Strategy. Policy S1 (the first substantive page of the document) sets out the Settlement Hierarchy. This has 3 components.

Rugby Urban Area “will be the main focus for new homes and employment”  
Main Rural Settlements which “will accommodate developments”  
Other Rural Settlements within which “only limited development will be permitted”. Newton is listed as one of those Other Rural Settlements.

The Plan then goes on to allocate 265 houses, a secondary school, and an employment area within which are embedded a gypsy and travellers site and a lorry park within Newton & Biggin. For the avoidance of doubt it should be noted that the Policy Map clearly illustrates that the Employment Area and School Site lie outside the “Rugby Urban Area” and thus within the “Other Rural Settlement of Newton”. This scale of growth does not fall within any reasonable definition of “limited development”

**The Parish Council therefore objects to the overall scale of growth that the Preferred Options seeks to allocate to the Parish as being not only inappropriate in itself but also directly contrary to the provisions of Policy S1 of the Plan.**

## RESIDENTIAL ALLOCATION, NEWTON MANOR LANE.

The Preferred Options proposes the allocation of a site for 240 houses accessed from Newton Manor Lane.

Firstly, the north/south alignment of the former Great Central Railway has long provided a defensible boundary to the urban edge of Rugby, a line where the urban area ends and the countryside begins. As such it becomes of value to both urban and rural residents. The proposal sees a relatively isolated residential development crossing over that boundary. This is bound to increase future pressure for development on neighbouring land, something that will be detrimental to the quality of life of existing Coton residents as well as compromising the identity of Newton as a village.

Secondly, the site lies wholly within the “Green Blue Infrastructure Plan” that forms a part of the current Adopted Local Plan. Unfortunately, despite its proclaimed environmental credentials, this does not seem to have found its way into the Preferred Options. Nevertheless, it would be hoped that an emerging Plan that prides itself on being ‘green’ would embrace the principles of the Green Blue Infrastructure.

Whilst it is accepted that the potential developer’s illustrated plan shows a considerable amount of open space on the site there is no evidence that this will function as a Green Blue Corridor. (This point will be returned to in relation to the proposed School Site).

Newton Manor Lane is a route that until relatively recently was a farm track. It still displays many of the characteristics of a farm track in terms of its width as well as its horizontal and vertical alignment. At its eastern end is the St Thomas Cross junction - a non-standard junction that has been the source of local concern for decades.

The developer’s plan shows access to the site being gained via 2 T-junctions to Newton Manor Lane. Such junctions are wholly inadequate; it will prove difficult to impossible for residents to leave the site safely at peak times. Furthermore, the additional traffic will only add to existing congestion and accidents on Newton Manor Lane itself and at the St Thomas Cross junction. This is a point that will be returned to in relation to the School Site.

**The Parish Council therefore objects to the proposed allocation of land off Newton Manor Lane for 240 homes on the grounds that it is (a) an unwarranted intrusion into the rural area beyond a well-established urban edge, (b) that it does not have regard to the principles of the Green Blue Infrastructure Plan and (c) the accesses shown to Newton Manor Lane are wholly inadequate and are bound to exacerbate existing problems on the lane itself as well as at St Thomas Cross junction.**

**If, despite these objections, the development goes ahead it should incorporate a layout that does not seek to ‘unlock’ access to neighbouring land, include provisions for a Green Blue Corridor and include substantial improvements to Newton Manor Lane and the St Thomas Cross junction that pay respect both to the rural location and the amenities of existing residents.**

## SCHOOL SITE.

The Preferred Options seeks to allocate a site for a Secondary School at St Thomas Cross.

The current Adopted Local Plan allocated a site for a secondary school at Coton East. Because there was some uncertainty as to whether the school was required the Inspector time-limited the allocation. Warwickshire County Council (WCC) as Local Education Authority (LEA) subsequently decided the school wasn't needed and the allocation lapsed.

It is understood that WCC has now decided that a school is required to accommodate future growth and RBC is seeking to allocate the site at St Thomas Cross.

RBC acknowledges that the site has "challenges" which is something of an under-statement. The site has connectivity and access issues, it is far from flat, it is crossed by a public right of way, above it are 400,000v electricity cables, below it is the Cemex slurry pipeline and there is an archaeological interest.

WCC requires new school sites to be free of "constraints" - particularly given that it is unable to address these given financial issues. It is acknowledged that there are few alternatives - RBC only references 2 at Cosford and Clifton.

In these circumstances it is difficult to imagine a more unsuitable location than the selected site but the Parish Council is obliged to respond to the consultation on the basis that, contrary to all of the evidence, development of a school may proceed.

The site is extremely poorly located in terms of connectivity. The vast majority of pupils and staff would be unable to access it without use of vehicles. Only a handful would be able to walk or cycle. This reliance on vehicles is contrary to both the NPPF and the Preferred Options.

No access is shown to the site. There are 2 Road frontages - Newton Manor Lane and Newton Road. Both are wholly inadequate to serve a development of this scale and the necessary roadworks would irreparably damage the character of the area.

WCC requires a flat site. The necessary earthworks required to deliver this would not only be hugely expensive but also unacceptable in environmental, ecological and landscape terms.

No provision whatsoever is made (or is probably possible) to embed a Green Blue Infrastructure Corridor link.

As a result of activity on site, vehicle movements and light pollution the development would have an unacceptable impact on the village of Newton and those properties on Newton Manor Lane.

**For the reasons given above the Parish Council objects to the proposed development of a secondary school at St Thomas Cross. It is noted that**

**the site for a school at Coton East remains undeveloped. It has none of the problems attendant on the St Thomas Cross site and enjoys widespread public support. RBC, WCC and the landowner are encouraged to cooperate in bringing this site forward.**

**If despite these objections the development goes ahead it MUST seek to address those concerns relating to access, disturbance, lighting, connectivity, vehicle movements, environmental and ecological impact identified above.**

#### **HILLCREST FARM, NEWTON LANE.**

The Preferred Options original sought to allocate a site of 3ha. When it was pointed out that this was far in excess of what was required to accommodate the suggested 25 houses RBC accepted that a mistake had been made and corrected the allocation to 1ha. This response relates to that reduced area.

The site lies adjacent to, but outside, the Village Boundary as defined on the current Adopted Local Plan. However, it is largely occupied by agricultural/equestrian buildings and therefore no objection is raised to the principle of its re-development for residential purposes.

The proposals require a footpath to be constructed on the west side of Newton Lane. That boundary is currently marked by a substantial hedge interspersed with mature trees. This provides a pleasant outlook for residents on the east side of Newton Lane as well as serving as a habitat and foraging route, the site falling within the Green Blue Corridor network. This hedge and trees must be retained and if there is insufficient room to accommodate a footpath on its eastern, highway side it should be constructed to the west, within the development.

The mix of house types and tenures, their design and materials should follow the guidance within the emerging Neighbourhood Plan which is scheduled to be adopted in advance of the Local Plan.

The well-used public footpath at the north of the development must be retained in situ and provide a safe, pleasant and convenient route.

**No objection is raised in principle to this development subject to it being restricted to the 1ha area shown on the Preferred Options, the existing hedge and trees to the eastern boundary being retained, the mix and design of the properties being in accordance with the emerging Neighbourhood Plan and the existing footpath being retained in situ as a safe and pleasant route.**

## COTON EAST EMPLOYMENT ALLOCATION.

This site is allocated for residential purposes in the current Adopted Local Plan. There is clearly a government-driven imperative for the new Plan to deliver a quantum of housing to meet targets. The 'dispersal strategy' which underpins the Plan and the sites that have been selected as a result suggests that Rugby Borough Council is finding it more of a challenge to deliver housing than employment sites. In that context very careful consideration needs to be given by RBC before giving up an existing housing allocation in favour of employment. Switching an existing residential allocation to employment puts the search for housing sites at a figure of minus 450 before the search starts. Retaining Coton East for residential would remove the need to allocate 240 houses on a nearby greenfield site at Newton Manor Lane along with other proposed Green Belt sites. It would also deliver a secondary school in a popular location that is largely free of constraints.

If, however, RBC is determined to remove a residential allocation and to decant the shortfall of houses to alternative Greenfield and Green Belt sites the Parish Council is strongly of the opinion that there are many issues that must be addressed if the alternative employment use that will supersede residential is not to have an unacceptable impact on the amenities of existing residential properties in Coton East and Newton Village.

Firstly, the developer's current illustrated plan has developable plots positioned right on the site boundaries. This is particularly acute in relation to Plot 3 which is very close to residential properties in Coton East and Plots 6 & 7 which abut Newton Lane and are thus close to houses at the north of the village. Furthermore, in relation to 6 & 7 a vehicular route which will accommodate HGV movement is shown between the plots and Newton Lane.

The potential for unacceptable impact on residential amenities arising from this close juxtaposition cannot be overstated. Visual dominance is an obvious problem as is light pollution and noise, including that from vehicle beepers. Furthermore, the positioning of Plots 6 & 7 is likely to bring about an unacceptable industrialisation of the approach to Newton Village. It is absolutely essential that these matters be addressed as a matter of urgency before the Preferred Options draft allocation is confirmed.

The Master Plan associated with the outline planning permission for residential illustrated substantial areas of open space both within the development and along the eastern boundary adjacent to the Great Central Way.

It could be argued that incidental and amenity open space is of less significance within an employment area but that adjoining the Great Central Way assumes even greater importance if an employment development is to be supported. Perhaps the incidental space within the development could be directed to this boundary.

As part of the evidence base for the emerging Neighbourhood Plan a landscape analysis was commissioned from AECOM. This has been shared with RBC and the site owners and its recommendations should be followed in respect to the siting and design of buildings.

The Preferred Options seeks to embed a site for Gypsies and Travellers within the employment allocation. The Preferred Options only makes reference to “8 pitches” and does not clarify whether these are to be for transit or residential use but the wording suggests the latter.

On that basis there is no history of gypsies and travellers ‘having recourse’ to this area, an important prerequisite given that gypsies and travellers should not be required to live in a location to which they have no affiliation.

On a related topic, RBC as the Local Planning Authority would be unlikely to allow 8 houses for the settled community within an employment area so it is not clear why this is considered an appropriate residential location for gypsies and travellers.

Lastly, and returning to the proposed Secondary School Site at St Thomas Cross, the current Adopted Local Plan included a temporary (now lapsed) allocation on what is now the proposed employment area. That site remains undeveloped. RBC, WCC and the site owners are encouraged to explore whether that site might still be available as it provides a far better location for a school which also enjoys public support.

**Given that the site is already allocated for residential development Rugby Borough Council should give very careful consideration before changing it to employment. The loss of an existing and substantial housing site only adds to the difficulties of allocating sufficient residential land to meet targets and inevitably results in the development of Greenfield and Greenbelt sites that would otherwise be unnecessary. It would also allow for the development of a secondary school on a site that largely free of constraints.**

**If, however, RBC is determined to lose this existing residential allocation then the Parish Council has serious concerns about potential impact on visual and residential amenities arising from the employment layout as currently illustrated. It is essential that serious consideration be given to overcoming these before any designation is confirmed, by the careful**

**siting and design of buildings, management of noise and light and high quality and substantial screening of all appropriate boundaries. All parties should also be exploring the potential for the site to accommodate a secondary school.**