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Rugby Council Town Hall Evreux Way Rugby CV21 2RR

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Job Ref:

2nd February 2024

Dear Sir/Madam,

A RESPONSE TO RUGBY LOCAL PLAN REVIEW - ISSUES & OPTIONS CONSULTATION (REGULATION 18)

Cushman & Wakefield (C&W) is instructed by Warwickshire Property & Development Group (WPDG), who are acting on behalf of WCC as the County Council's Delivery Vehicle, to prepare and submit comments to Rugby Local Plan Review – Issued & Options Consultation.

The comments below specifically refer to the Homestead Farm, a site in Dunchurch which is being promoted by WPDG and WCC for development. The site lies on the edge of Dunchurch settlement as shown in the location plan below. Alongside this response, C&W also is submitting this site through the Call for Sites consultation for review by the Rugby Council.

Warwickshire Property and Development Group aims to revitalize the County by implementing regeneration schemes, constructing new housing that caters to local needs, including affordable housing, and promoting low-carbon living. Additionally, the group will generate short and long-term financial returns for Warwickshire County Council.



Location Plan (Source: OS Map, 2024)



DESIGN CODING AND GUIDANCE

29. Should we produce design codes as part of our new local plan?

WPDG consider it would be helpful for a design code to be produced as a part of the new local plan. It is considered design codes should be limited to specific character areas and//or large new development sites.

- 30. Which areas should design codes cover?
- (a) Borough-wide
- (b) Borough-wide divided into character areas (for example Rugby town centre, interwar suburb, Victorian terrace, village core)
- (c) only for some neighbourhoods (please specify which),
- (d) only for large new development sites
- (e) other (please specify)

WPDG consider Design Codes should cover only character areas or large development sites. It would not be appropriate to create a design code to cover smaller sites, such as Homestead Farm, as the best approach is to evaluate the site-specific opportunities and constraints of smaller sites.

LAND FOR HOUSEBUILDING

- 31. How many homes should we be planning for?
- (a) Minimum local housing need
- (b) The HEDNA 2022 need
- (c) Other (please specify)

WPDG encourages maximising the use of land for development to ensure the delivery of housing to meet identified needs and, therefore, supports the HEDNA number (735 homes per year).

WPDG notes that in relation to small sites, NPPF Paragraph 70 states: "Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly."

32. Would you support RBC both improving existing and developing new social and affordable housing (like the regeneration of Rounds Gardens and Bart Place)?

Yes, WPDG supports the delivery of new social and affordable housing.

33. Please provide any comments you have on the suitability of any of the broad locations listed above for new housing. Are there any locations that we have missed?

The majority of the identified locations lie in the Green Belt, which should be supported only where allocated land is identified as brownfield land. The updated NPPF discourages the review and alterations of Green Belt boundaries unless special circumstances exist. Paragraph 145 states: "Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process."

WPDG considers the Council should prioritise delivering housing on sites within settlements outside of the Green Belt such as **Dunchurch**), which is a greenfield site immediately adjacent to an existing settlement



boundary with existing access and in a sustainable location and bounded between residential properties. (Although recognises that some localities have substantial constraints against growth due to tight Green Belt boundaries

NPPF Paragraph 70(a) states that the Council should identify at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved"

Applying the HEDNA target, the NPPF encourages at least 74 dwellings per year on small sites of a hectare or less and the Dunchurch site can make a significant contribution towards this target.

34. Do you support a requirement for all new dwellings to meet the additional Building Regulations standard for accessible and adaptable dwellings and for at least ten percent of dwellings to be suitable for wheelchair users?

Yes, the Council should seek 10% of accessible dwellings, Warwickshire Property and Development Group will provide this on the scheme if the site is to be allocated (subject to viability).

35. Please provide any other comments you have on the type and size of new homes we need.

WPDG supports an approach to deliver a HEDNA 2022 suggested housing size mix, where 2-bed and 3-bed homes make up the largest proportion of housing. House type delivery however should reflect local market characteristics and prevailing market demands for differing house types.

OTHER TOPICS

37. Do you support our intention to bolster our policies on sustainable travel?

Yes, WPDG supports increasing the emphasis on sustainable travel to accord with Warwickshire County Council's new Local Transport Plan 4 and the forthcoming transport plan for Rugby Borough to be produced by Warwickshire County Council.

Summary

WDPG supports the allocation of land to meet housing needs based upon the HEDNA figure of 735pa. In line with the NPPF, at least 10% of all housing should be allocated on small sites of 1ha and under, such as the subject site. WDPG supports the HEDNA suggested housing mix where the highest proportion of dwellings are allocated for medium sized 2-bed and 3-bed houses.

The Rugby Local Plan should prioritise delivering housing outside of Green Belt. Housing provision should be focused on previously developed land or greenfield land in highly sustainable accessible locations on the edge of existing settlements.

WDPG as a company representing a public body also supports the delivery of new social and affordable housing and building accessible dwellings to future-proof dwellings for older generations or disabled persons.

If you require further information, please do not hesitate to contact me.

Yours sincerely



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Warwickshire Property & Development Group

Company Overview



Who we are...

Warwickshire Property & Development Group (WPDG)

- We are the arms length delivery vehicle of Warwickshire County Council
- Separate legal entity with our own Non Exec Board
- Our sole shareholder is WCC
- We comprise a team of
 - Development specialists and Surveyors
 - Estates Surveyors
 - Finance and administrative support



Our Vision

"Warwickshire Property and Development Group will deliver sustainable, high quality new homes and new commercial space in the County of Warwickshire. All profits made will be re-invested within Warwickshire for the benefit of its residents and neighbourhoods across the County."

Our Purpose

Launched by Warwickshire County Council in August 2021 WPDG's main purpose is to positively contribute to the delivery of the Councils Commercial and Medium Term Financial Strategies notably:

- WCC Council Plan 2020 2025
- WCC Covid 19 Recovery Plan
- WCC Commercial Strategy 2019



WPDG

Warwickshire Property Development Ltd

Direct Development – Buy land, de-risk, fund development, dispose/retain
Joint Venture – Develop Warwickshire
Development Management – DM function and support to WCC
Strategic Land and Promotion
Consultancy Support / Critical Friend –
Development Advisory

Warwickshire Property Management Ltd

Property inspections – rolling inspection cycle
Rent collection – monthly invoicing
Rent reviews – periodic negotiations
New leases – renewals to existing tenants & re-letting to new tenants
Landlord consents – assignments, sublettings, building work, variations
Ad hoc transactions & Professional advice – terminal dilaps, legal disputes, etc



What we've achieved so far

Joint Venture with Countryside Partnerships

- Established Dec 2022
- 30 year relationship
- Initial pipeline of 2000 dwellings
- Operates on a 50 / 50 basis
 - Land matched by development value
 - Priority returns and remainder split 50 / 50 between parties









Develop Warwickshire Sites

Top Farm Nuneaton

Outline planning secured on 1700+ dwelling SUE

- First Phase reserved matters application submission May 2023
- Link Road Construction start Spring 2024
- First phase housing start autumn 2024 (500+ dwellings)
- 10 year build programme







Develop Warwickshire Sites

Brookmill Meadow

Warton - Reserved Matters Consent secured on 71 dwelling scheme

- Started on site Autumn 2023
- Mix of 2, 3 & 4 bed houses
- Show home/marketing suite open Feb 2024







Develop Warwickshire Sites

Water Orton School

- Proposed redevelopment of an allocated site for 50 / 60 dwellings
- Currently working up planning application for 55 dwellings – with associated survey work underway
- Consultation event Dec 22 showed broad support
- Start on site early 2025





Southam Park

42,200 sq.ft industrial scheme

- Secured Full Planning Consent January 2023
- Appointed contractor (MCS) January 2023
- Started on site Feb 2023
- PC Dec 2023

Property & Development

Currently pre-let 50% of the scheme





Former Manor Park School

Nuneaton

- Secured outline planning consent for development comprising up to 58 dwellings and a 65 unit Extra Care facility
- Procurement process for delivery partner appointment underway – complete Spring 2024
- Reserved Matters submission Autumn 2023 with a start on site Summer 2024
- WPDG will look to progress an enabling package to de-risk the site









Justice Walk / Vicarage St - Nuneaton

- Acting as DM on behalf of WCC.
- Outline planning application submission for a new Library and Business Centre and up to 65 residential dwellings
- Anticipated outline consent granted April 2023





Mabels Farm – Ilmington

- Neighbourhood Plan allocated site for 20 dwellings
- Lifetime Farm tenancy relocation
- Planning application submitted for farmstead relocation
- Working up a scheme on the development site, soon to embark on delivery partner procurement







The Future

Build the Pipeline

- Currently 10 15 sites going through initial due diligence, scoping and pre-app discussion
- Purchase land within the market / Assemble sites
- Work with District Councils
- Partner with the private sector funding / JV / Development Agreements

Strategic Land Promotion

- Large scale housing, mixed use and industrial development opportunities
- Align asset base with local plan reviews and opportunities South Warwickshire Local Plan, Nuneaton & Bedworth, Rugby, North Warwickshire local plan updates

Add sites to the Develop Warwickshire JV

Opportunity to add more land into the JV both strategic and large scale individual and packages of land

Continue to effectively manage the WCC Asset base

Build Awareness & Relationships



Contact







Warwickshire Property & Development





