

Issues and Options Consultation  
Development Strategy  
Rugby Borough Council  
Town Hall  
Evreux Way  
Rugby  
CV21 2RR

2 February 2024

Dear Sir/Madam,

RRS023/GP

**RE: Local Plan review - Issues and Options consultation – representations on behalf of SUE GP LLP**

We write to you to set out representations on the Issues and Options consultation as part of the Local Plan review process. These representations are submitted on behalf of SUE GP LLP, the landowners and master developers of the Houlton Sustainable Urban Extension (SUE) formerly known as Rugby Radio Station. SUE GP LLP is a joint venture between Aviva and Urban & Civic. The latter are responsible for the construction and implementation of Houlton, which has delivered c.1,200 new homes to date, plus associated infrastructure, schools and mixed use area and represents one of the key housing delivery sites for Rugby Borough.

The Houlton SUE was first allocated in the 2011 Core Strategy and subsequently carried forward into the 2019 Local Plan. Outline planning permission (OPP) was first secured in 2014 (R11/0699) and a new permission was secured via a S.73 planning application in 2017 (R17/0022). It is this permission which is being implemented by SUE GP LLP.

**Representations**

The representations reflect a mix of queries, clarifications and responses to the questions identified in the Issues and Options consultation document. These have been split into the following topics as per the document.

**Land for employment uses**

Paragraph 3.36 states that 31ha of employment land has been secured at Houlton through the grant of planning permission. This hectareage represents the amount secured under the 2014 OPP, however the 2017 permission secures 16ha. This lower figure is identified in *Policy DS4: Employment Allocations* in the current Local Plan. The future Local Plan documents should ensure this lower figure is identified.

**DAVID LOCK ASSOCIATES LIMITED**

50 North Thirteenth Street  
Central Milton Keynes  
Buckinghamshire  
MK9 3BP

☎ +44 (0) 1908 666276

✉ mail@davidlock.com

🌐 www.davidlock.com

In addition it would be helpful to understand further details on the proposed area for employment north of Houlton and west of the A5. It isn't clear what is informing the proposed area in terms of physical constraints, and whether any consideration has been given to the impacts on Houlton, primarily from a landscape and visual impact and noise perspective. It would be helpful to understand if this will effectively be an extension to DIRFT or a separate employment area.

#### Town centre regeneration

Paragraph 4.10 suggests that District and Local Centres within the Houlton SUE could be formally defined in policy terms as part of the Local Plan review. Our response to Question 10 of the consultation document sets out our response to this.

*10. Should we define other local centres outside of the town centre? If yes, which centres should we include?*

With specific reference to Houlton, it is considered that the Dollman Farm local centre or Houlton district centre do not need to be defined in any emerging policies through the Local Plan Review process. Firstly, both centres are identified in the OPP for Houlton through planning conditions, namely Condition 5 and Conditions 41-49, which fix the location and extent of the centres respectively. These planning controls are considered sufficient to ensure they provide for the day to day needs of Houlton residents and provide a supporting role for Rugby town centre without impacting on the vitality and viability of the centre itself. Secondly, Houlton district centre is progressing well however unlikely to be an operational or complete centre at the point when the new Local Plan is expected to be adopted (end of December 2026).

#### Design coding and guidance

*30. Which areas should design codes cover?*

- (a) Borough-wide*
- (b) Borough-wide divided into character areas (for examples 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)*

The Houlton SUE has a well-established design guide process as part of the OPP. To date four Key Phase Design Guides have been approved across the site which require a high level of design quality for residential, commercial and mixed-use development. Further design guides will be produced for the remainder of the development. This process has been operational for several years and has proved highly successful in securing the high-quality design evident at Houlton. If RBC are minded to produce a borough-wide design code Houlton should be exempt from the coding process to avoid duplication of effort or confusion as to which Code would apply.

#### Land for housebuilding

Paragraph 9.24 confirms that a Housing and Economic Land Availability Assessment (HELAA) has not yet been produced. The Council should confirm at the earliest opportunity when it will be in a position to publish this document.

**Summary**

We trust these representations will be taken into consideration as the Local Plan Review progresses, and we would be happy to engage with the Council to assist with their progress towards the Reg. 18 stage scheduled for July 2024. Please do not hesitate to contact me if you have any queries on the submitted information.

Yours faithfully,

