



Thurlaston Parish Council
Thurlaston
Rugby

10th March 2020

Ms Karen McCulloch
Development Team
Rugby Borough Council
Town Hall
Rugby

Posted by email to karen.mcculloch@rugby.gov.uk

Dear Ms McCulloch,

Ref: R16/2569 – Amended Plans: Tritax Symmetry – proposed development of Symmetry Park

I am writing to you as Chairman of Thurlaston Parish Council with regard to your letter of 14th February 2020 in which you invite comments on the revised planning submissions made by Tritax Symmetry.

We wish to lodge the following points:

1. Road Design and Traffic Planning

We note the proposed changes to the junction of the Coventry Road (B4429) and the A45/M45 intersection – part of Highways England (HE) Strategic Road Network (SRN). Whilst we appreciate HE's concerns we are not convinced that the proposals will mitigate safety issues with regard to HGV stacking and general vehicle movements within the area, particularly at peak times.

By definition a logistics park will result in vehicles offloading goods at warehouses, and potentially a range of vehicles (perhaps most less than 7.5 tons?) which, inter alia, will be collecting goods for local distribution. In total these traffic flows raise the following points:

- (a) The chicane effect of the new layout from A45/M45 junction to the B4429 and the immediate junction on Thurlaston Main Street could impede traffic movements, and hence introduce congestion and safety concerns.
- (b) We are offered no metrics with regard to traffic volumes expected on Symmetry Park. We note the site may employ up to 2,400 people. We have no indication of how many workers, by hour of day, will bring vehicles onto site and park. Tritax Symmetry has made no proposals to reduce single car occupancy travel to the site. This needs to be addressed within the Rugby Travel Plan.

HGVs typically have to queue waiting to obtain their loading/unloading slots at their respective bays. We can find no consideration of the impact of HGV parking on the Symmetry site.

Freight drivers may exceed their allowed continuous hours driving times and will require rest periods. There is no indication whether this has been factored into the Symmetry Park design.

Vehicle congestion is therefore potentially a risk requiring mitigation. Overflow parking and traffic congestion in local neighbourhoods must not be allowed.

- (c) Concerns have been raised previously about the safety of the Thurlaston village junction from the Coventry Road (B4429) – currently within a 50mph zone. The junction has no street lighting, it can be very difficult to leave Thurlaston easily and safely during busy traffic periods. The Thurlaston Parish Council has asked for improvements to be made to this junction with the introduction of road lighting and traffic lights. This point was last lodged with Ms Chettle-Gibrat at our Parish Council meeting with her on 22nd January 2020.
- (d) There are no details concerning the proposed Fire Station, now located on the south side of the Coventry Road. We have therefore not been able to factor into our consideration the impact of this facility. Whilst we expect this to be a modest sized building, it is imperative that unrestricted fire tender movements can be undertaken 24/7. This requirement needs to be tested in traffic remodelling scenarios.
- (e) We note road and HGV route proposals are labelled as indicative.

Currently we believe traffic planning baseline metrics are in error, we do not know which scheme RBC considers their preferred HGV Route Strategy, there are no details of implementation timescales and the respective phasing of individual road sections.

Ms Chettle-Gibrat has assured us that the Homestead connection would be a precursor to bringing on stream Symmetry Park and Cawston property developments. However, currently Homestead Link proposals are indicative, shown as multiple design options. Clearly this is frustrating and makes it quite difficult to offer an informed opinion. Risks remain.

We do support route schemes that decree Dunchurch will be a *No HGV Route*, and legally enforced.

- (f) The north spur off the A45 to Symmetry Park is set potentially to link, via Potford Dam, to the Western Relief Road. This may assist SW Rugby but also moves a traffic pinch point to W/NW Rugby. Tritax Symmetry state ‘in addition, although not part of the application, there is potential for the alignment of a link road known as the Potford Dam to be altered from that proposed in the Local Plan’. RBC need to define their preferred HGV road strategy and the policing of the same.
- (g) We note that both RBC and Highways England have declared that considerations are required to the Blue Boar junction. The same point is made in the draft WCC Minerals Plan.

Clearly there has been no co-operation across these WCC and RBC initiatives. Thurlaston Parish Council has repeatedly argued all parties have a duty to co-operate. It is fundamental to the Localism Act.

Traffic remodelling is required to factor in SW Rugby Local Plan developments with the Minerals Plan.

There is a requirement for an approved Rugby/HE approved SRN plan, albeit that a phased implementation will be required.

- (h) HE note that water attenuation storage for surface water runoff from the development Zone C would be provided by utilising storage capacity at Potford Dam to the north of the site.

The Parish Council challenge the viability of this proposal. We note that currently (March 2020) the dam appears full, and water is discharging into a culvert heading in a NW direction. HE has also advised infiltration testing will be required before a detailed design can be approved.

- (i) Currently indicative road drawings do not provide detail of walking, cycling and horse-riding assessments around the SRN. HE indicate that this assessment and review will be required. Thurlaston residents seek to have secure pedestrian access across the A45 from Thurlaston to the Frankton Straight Mile, such as to make the Dobbies shopping complex easily accessible by cycle or on foot. It is an important issue that requires attention as part of planning for a carbon neutral environment.

2. Visual Assessments

- (a) We are pleased that there will be a reduction of the heights of warehouse buildings. These do not completely mitigate our concerns. We have undertaken approximate triangulation measurements from the Thurlaston viewpoint (Appendix C4/EDP17) and estimate that the top 3m of Zone C buildings will be visible, albeit from a 500m distance. Clearly adequate mature tree planting is required, most notably along Northampton Lane where the current tree stock has not been managed – indeed there are numerous gaps.
- (b) We look forward to being consulted on the exterior fabrication and colour of the proposed buildings to ensure they settle into the existing green landscape comfortably.

We have also considered views of the northern and eastern aspects of the warehouses. Large warehouses must not be allowed to ruin completely the beautiful vistas that walkers currently enjoy from the Cawston spinney area. DbSymmetry's EIA Scoping Study discusses potential visual effects and these include changes to views from the following receptors:

- Users of public rights of way which pass through or border the site and in the local vicinity;
- Residents of Station Farm Cottage and Oak House;
- Residents of Mill House, Windmill Farm and Windmill Cottages;
- Residents in properties on Coventry Road (B4642) including Brickyard Cottages, The Spinney, Bushfield and Colmar House;
- Residents of Potsford's Dam Farm and The Ryelands.

As such the proposals do not currently propose any significant rural landscaping to ameliorate these concerns which straddle Thurlaston, Dunchurch and Cawston parishes.

- (c) A new development is the incorporation of an Energy Centre (EC).

The proposal has no detail concerning the design, overall height, and fabrication used for the building. Two stacks are required, which we assume refer to

chimneys. The buildings are proposed for Zone C – arguably the most rural area of the complex. We propose this facility, if actually required, should be located as far as possible from Coventry Road and Windmill Lane dwellings such as towards the west perimeter of Zone D.

3. Energy Centre

An Energy Centre (EC) has been introduced into the proposal. Tritax Symmetry do not offer an explanation why a 5MW (enough to power circa 3,000 homes) facility is required.

The lack of information concerning the strategic purpose, technological design, physical building design, and pollution details (GHG emissions), noise and vibration is unacceptable. ECs are operated 24/7 and typically will produce noise/vibration – sometimes a continual droning noise. BREEAM compliance per se does not answer fully the concerns we raise.

Thurlaston Parish Council seeks clarification as to how the EC proposals comply with RBC's declared Climate Emergency (July 2019) and its determination to become carbon neutral. The conversion of high quality arable farming land into any form of carbon polluting environment is unacceptable.

The EC provides yet another dimension to the unacceptability of Tritax Symmetry's proposals.

In conclusion our Parish Council appreciates the opportunity to review and comment on the latest Rugby Local Plan proposals.

Our Parish Council remains committed to collaborative engagement with both Rugby Borough Council and Tritax Symmetry and its agents.

However we also reiterate that we seek to mitigate risks that may contribute to any form of vandalism and pollution that will detract from the quality of the Thurlaston Conservation area and neighbouring areas both for ourselves and future generations. Regrettably our angst remains high, and these proposals do little to promote the wellbeing of our residents, indeed the converse is true.

Yours sincerely,

Dr Keith Boardman
Chairman, Thurlaston Parish Council
07973 260038