



+Thurlaston Parish Council  
Thurlaston  
Rugby

8<sup>th</sup> September 2021

Ms Karen McCulloch  
Development Team  
Rugby Borough Council  
Town Hall  
Rugby

Posted by email to [karen.mcculloch@rugby.gov.uk](mailto:karen.mcculloch@rugby.gov.uk)

Dear Ms McCulloch,

**Ref: Planning Application R21/0829**

**SOUTH EASTERN PART OF ZONE D - LAND NORTH OF COVENTRY ROAD, COVENTRY ROAD, THURLASTON**

**For: Provision of an Energy Centre**

This document is Thurlaston Parish Council's (TPC) submission with regard to planning application R21/0829.

There are a number of codependencies between this application and various RBC policy and planning documents – most notably these are:

- Rugby Local Plan.
- SW Rugby Supplementary Planning Document (SPD) – June 2021.
- Planning Application R16/2569 - conditional approval on 3<sup>rd</sup> November 2020,
- Planning Application R20/1026 – approved with conditions on 4<sup>th</sup> May 2021.
- Planning Application R20/0789 – currently under consideration.

**TPC Declarations:**

**1. Holistic Impact Assessment**

TPC asserts that there are planning codependencies as a result of piecemeal developments in close proximity and/or shared across sites, and that all the applications have consequences with regard to the environment and pollution (air quality, noise, visual, traffic). It would be negligent of planners not to consider R21/0789 without also appraising the cumulative effect of all (as published to date) Symmetry Park proposals, should they be granted permission to proceed. In essence a holistic assessment should be undertaken which recognises the cumulative effect of all planning proposals – namely within Symmetry Park Phase 1 (Zones A) and Phase 2 (Zone D), and other aspects of the Local Plan such as highways infrastructure and adjacent housing schemes. TPC is not aware that any such pre and post implementation assessments are currently available, or even proposed.

Whilst the Applicant advises that there may be biodiversity gains these are likely to be offset by huge increases in carbon emissions from the site and pollution from visiting vehicles. We therefore question whether a fully populated Symmetry Park will be ecologically sound and therefore believe it will be harmful both locally and more widely to the locality. Tacit with this is that TPC has already lodged that residents consider the scheme detrimental to peoples' wellbeing - the main reasons being due to air quality and noise pollution.

## **2. Supplementary Planning Document June 2021**

The SPD is a planning document; it is not an implementation plan per se. The adopted SPD June 2021 contains an *Indicative Phasing Plan* (Appendix L); there is no project plan to show the detailed sequence of specific projects (typically described as a project critical path) most notably regarding *Strategic Infrastructure to support the whole site*. This Plan, when available, is fundamental because a condition of allowing Symmetry Park occupancy is that appropriate infrastructure improvements will become available within congruent timescales.

### **Energy Centre – purpose and impact**

Zone D has been remodelled since the original R16/2569 submission. Most notably multiple warehouses have been combined into a single building with the addition of an Energy Centre (EC) which in the original submission was located in Zone C.

The new EC location is considered a minor improvement in that the EC building will be located further away from extant dwellings. To some degree it will eventually be visually screened by other buildings on the fully developed site.

The concern that TPC has already lodged under the R16/2569 representations was the magnitude of the power output; arguably Symmetry Park will generate as much power as might be used by up to 5,000 dwellings. Whilst we respect that BasePower is considered a leading supplier of bespoke industrial energy centres this does not negate a requirement to ensure **all aspects** of pollution affecting air quality and the site's carbon footprint within the locality are appraised.

To put the above recommendation into context TPC has consulted the Carbon Trust's analysis and advice regarding warehouse design and operational use. Whilst a developer may build to latest BREEAM standards this does negate the impact of burning hydrocarbon fuel especially when it is estimated warehouse heat loss may be as high as 25% due to loading bay heat escape. The large Zone D warehouse will have 55 loading bays. Although gas fired engines typically operate at greater than 90% efficiency the overall site may actually realise a net efficiency which is much reduced due to these heat losses and therefore exasperate carbon neutrality claims.

Whilst the pollution impact of Tritax Symmetry's warehouse scheme will be calculated on theoretical models, this needs to be supported by actual pre and post implementation data. TPC therefore asserts that the impact on air quality and the site's carbon footprint pre and post implementation are significant considerations. TPC recommends RBC should commission their own independent assessments of pre and post implementation pollution levels. These data will then inform accurate calculations on the net carbon footprint increase/reduction.

These arrangements will also promote RBC in demonstrating it is being proactive in the development, implementation and monitoring of an effective Climate Control Strategy.

### **Government Environmental Bill**

RBC may consider the new Environment Bill is not a material consideration. However, during 2022 the Bill will provide much clearer guidance and the legal requirements on a raft of development matters which affect our climate. TPC therefore uses this current planning application to lodge with RBC important aspects of Symmetry Park, and the use of the proposed EC, which may require review and refinements in the near future.

TPC is mindful that the Local Plan is a legal instrument and therefore contractually binding. However, this does not prevent relevant parties from agreeing to use proposed developments as opportunities to improve and therefore reduce scheme pollution. Such changes do not necessarily need to change Local Plan objectives. Indeed, aspects of the Local Plan SPD are articulated as strategic principles and not design detail. Developers and individual organisations should be encouraged to identify potential ecology improvement opportunities – built on the premise that they demonstrate climate change and environmental control are being firmly embedded in all local authority business objectives. TPC asserts that residents, as ‘customers’ of the Local Plan, will be delighted because RBC will be seen to be proactively promoting sound environmental standards and therefore contributing to the improvement of peoples’ wellbeing.

In 2019 RBC declared a Climate Emergency. However RBC has not yet developed a strategic plan for the mitigation of carbon pollution for existing and proposed buildings and services. RBC’s recently published *Corporate Strategy 2021-2024* does not recognise forthcoming legislation (Environment Bill 2019-2022), neither is there a strategic plan for controlling climate change and biodiversity across the conurbation. This is regrettable; it should inform the Local Plan and facilitate dialogue to identify opportunities to improve net carbon gain now, thus contributing to Rugby’s pollution reduction requirements for the whole conurbation.

The Environment Bill proposes a number of changes relevant to developers in England, particularly concerning biodiversity net gain including net gain in Local Plans and National Policy Statements. The central ethos of the Bill are mandatory requirements for biodiversity net gain which will become a condition of planning permission in England. The granting of planning permission would be premised on the understanding that the objective of biodiversity gain is fulfilled. Biodiversity net gain of any development would have to exceed the pre-development value by a minimum of 10%, as measured by an updated biodiversity metric published by DEFRA.

The Government’s Climate Change strategic developments are therefore under critical review. Consultation is being concluded on the new the *Environment Bill*. The detail of how the Bill will affect local planning authorities will be clarified. It is likely there will be exceptions, for example certain ‘brown field’ developments may be partially exempt but not ‘green field’ developments.

### **Noise**

Noise from the proposed five engine EC has been considered by the Applicant and noise control equipment is deemed acceptable for such a building. TPC’s concern is that realistically an assessment is required of noise pollution from the whole of Zone D, and these data should be aggregated with the other zones which together form Symmetry Park. Noise pollution does not

have discrete boundaries and therefore from an environment perspective more holistic assessments are required. No standards have been produced by RBC for this aspect of the Local Plan.

This same point is considered under our representation for R21/0789.

### **Conclusion**

The Applicant proposes a 'Major Development' within Zone D of the SW Rugby allocation known as Symmetry Park.

RBC R16/2569 Planning Decision Notice places no specific project implementation requirements for the EC other than construction condition No7 (BREEAM standard for the building). However, by the very nature of hydrocarbon fuelled energy centres they are air polluting and require stringent carbon capture controls or countermeasures to mitigate their increase in carbon footprint.

For the reasons identified in this submission we request the following areas require resolution before planning approval is given. These are:

- (a) A detailed analysis of the polluting effect of this application is required in the context of the **whole** Symmetry Park complex. This will include the contribution of the EC to net pollution levels. Specifically, TPC asserts heat leakage from warehouse loading bays may be a significant indirect pollution contributor and therefore dramatically increase the carbon footprint of the site. Should pollution levels be excessive then mitigation plans are required.
- (b) TPC wishes to be reassured that a condition of approval is that an independent assessment of the total pollution (notably air quality, visual, noise and carbon emissions) impact is fully understood, and where excessive pollution is a risk, it can be mitigated. TPC argues that this is a responsibility that cannot be totally discharged by the Applicant because of dependencies which will be controlled by RBC such as other aspects of the Local Plan such as highway infrastructure.

We respectfully request that you acknowledge our representations, and in the meantime, we would be grateful if you would keep us informed of any new information supplied by the Applicant.

Yours sincerely,

Dr Keith Boardman  
Chairman Planning Subcommittee  
Thurlaston Parish Council