



Thurlaston Parish Council
Thurlaston
Rugby

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19th November 2020

Development Strategy
Rugby Borough Council
Evreux Way
Town Hall
Rugby
CV21 2RR

Posted by email to localplan@rugby.gov.uk

Dear Sir/Madam,

Revised Draft Air Quality SPD / Air Quality & Planning Guidance

Thurlaston Parish Council is pleased to submit its critique with regard to your invitation to make submissions concerning your Air Quality & Planning Guidance SPD.

In summary, our response covers the following subject areas:

1. Overview of principles being adopted to inform strategy.
2. HS5: Traffic Generation and Air Quality, Noise and Vibration – particularly with regard to industrial developments in SW Rugby. (Section 5)
3. Development Classification, Assessment and Mitigation (Section 6)

Each subject area has a section containing our detailed considerations and requests / recommendations for incorporation into the SPD.

1. Overview of Principles

Thurlaston Parish Council's (TPC) overarching concern about this 'guidance' is that it is primarily based on national parameters with little detail of local context. Indeed it describes a number of pollution mitigation aspirations (targets have qualifiers which are described as 'should' rather than 'must' dos) which therefore leaves implementation in the hands of developers without any evidence that Rugby Borough Council (RBC) will have the power to enforce compliance. This is of particular concern with respect to pollution effects. Pollution is largely invisible to our residents until such time as the cumulative effects are seen to become detrimental to people's health and wellbeing.

A related but important consideration is that on 19th July 2019 RBC declared a 'Climate Emergency'. A number of announcements were made, including:

The council has already made steps towards carbon neutrality, but by declaring a climate emergency we have acknowledged the significance of the issue.

The council committed to establish a cross party working group to advise the council's cabinet on the actions and timescales needed to move towards carbon neutrality by 2030.

RBC has formed a cross party working group to advise the Council's cabinet on the actions and timescales needed to move towards carbon neutrality by 2030. The Council will engage with partner councils, local businesses, environmental groups and residents to

inform future actions. Cllr Howard Roberts, RBC portfolio holder for environment and public realm, said: “Reducing carbon emissions is an urgent but complicated issue”. All these points are commendable. However RBC’s revised Local Plan SPD does not give any recognition at all to this ‘Climate Emergency’ declaration. We have found no evidence that RBC will proactively ensure **new** schemes will provide carbon neutrality compliance immediately. In particular new industrial schemes and their supporting transport requirements must comply at inception. This simply takes cognisance of the fact that in SW Rugby the proposed warehouse scheme is to be built on green land which is currently farmed. This oversight must be addressed to demonstrate how compliance will be achieved in accordance with Policy HS5. If this cannot be achieved then this signals new developments should be put on hold, until compliance can be achieved.

TPC has already submitted¹ its concerns regarding the large scale industrial development (known as Symmetry Park) and raised numerous reasons why this scheme is detrimental to people’s health and wellbeing - most notably due to traffic congestion and pollution (air quality, visual, noise, vibration). The Local Plan intention is to convert a carbon neutral rural landscape into a polluting environment with the result that RBC now has to ensure countermeasures are enforced to mitigate its impact. This is an appalling state of affairs, made worse by the fact that virtually all your proposed guidance is based on ‘should do’ aspirations.

As presented the ‘SPD/Air Quality & Planning Guidance’ makes it very difficult to assess overall vehicle pollution levels. There are too many variables to be able to do this with any realistic chance of retaining air quality neutrality particularly with regard to the combined effect of Symmetry Park and other neighbouring commercial enterprises. At minimum we expect RBC to undertake air quality measurements in the area around the Thurlaston roundabout (A45) and the remodelled Coventry Road (B4429), including the entrance to Symmetry Park, prior to any engineering works being undertaken. These baseline data can then be employed to assess pollution level changes that may have occurred as a consequence of the industrial complex. Without these data Thurlaston residents will have no way of knowing whether RBC has met its carbon neutrality commitment.

Thurlaston Parish Council Requests & Recommendations:

- We request that RBC undertake a due diligence exercise to ensure the Symmetry Park scheme can be implemented in full compliance with RBC’s Climate Emergency declaration and carbon neutrality commitment.
- We request that RBC undertake detailed air quality assessments in the vicinity of the Thurlaston roundabout and the B4429 prior to any engineering works being undertaken.
- We urge RBC to tighten pollution controlling aspirations into directives and how these will be policed and enforced.
- TPC requests that you provide a response to explain the **specific measures and controls** that will be applied to ensure aspirational mitigation is implemented.

2. HS5: Traffic Generation and Air Quality, Noise and Vibration

This section proposes that developments should promote a shift to use sustainable transport modes and low emission vehicles. Our comments are particularly concerned with the high volumes of HDVs and LDVs within SW Rugby primarily as a result of the warehouse complex. The SPD does not address the industrial context and controls to mitigate the

¹ Ref: TPC submission to RBC concerning a ‘Revised Draft SW SPD Consultation 1st – 20th October 2020’

impact of such vehicles.

To quote from Policy HS5:

Development proposals should promote a shift to the use of sustainable transport modes and low emission vehicles (including electric/hybrid cars) to minimise the impact on air quality, noise and vibration caused by traffic generation.

Proposals should be located where the use of public transport, walking and cycling can be optimised.

Proposals should take full account of the cumulative impact of all development including that proposed in this Local Plan on traffic generation, air quality, noise and vibration. Development proposals should complement the Air Quality Action Plan.

RBC's travel strategy assumes an early shift to the unilateral adoption of electric vehicles. This a priori assumption is without foundation. Realistically there is no evidence that such a strategy will be deliverable within the lifetime of the Rugby Local Plan. The issues regarding HDV battery power/weight, capacity and refuelling times are far from resolved². RBC seems to be in denial simply because the issue is not recognised at all within the SPD, let alone mitigated. The SPD provides no measures or practical guidance concerning how industrial scheme developers are expected to mitigate such issues.

Highlighted text (previous page) stresses the importance of assessing the cumulative impact of developments whilst taking cognisance of existing enterprises such as Cemex and the Ling Hall landfill site. This is important, however RBC has provided no evidence it is undertaking such tasks within its own territory.

TPC has provided details of other proposed developments in the Symmetry Park area such as WCC's Minerals Plan – both schemes will be significant users of HDVs. RBC must assess the combined pollution effects and demonstrate how the consequential cumulative pollution impact will be mitigated. Such tasks cannot be undertaken by any single developer; RBC needs to demonstrate how it will provide leadership to enforce compliance and thus ensure the cumulative pollution will be within safe bounds. This is therefore an omission in the draft Air Quality SPD.

With regard to SW Rugby developments, TPC has previously requested that RBC should bring forward the implementation of the Potsford Dam link road as this will have a substantial impact on reducing road congestion, and tacit with this an opportunity to mitigate HDV pollution³.

Thurlaston Parish Council Requests & Recommendations:

- We urge RBC to cooperate with WCC to ensure the cumulative pollution effects of SW Rugby industrial developments are appropriately understood and managed.
- The Air Quality SPD needs to recognise that whilst Government policy is to move towards low polluting vehicles this is a long term initiative and not deliverable

² As at 2020, UK and global forecasters expect HDV & LDV utilisation to rise to between 12% and possibly 48% by 2030. A 2018 UK Government forecast states a 20% take-up by 2050. The expectation is that their deployment will focus on 'last mile' or urban logistics deliveries. DHL is currently using one trial vehicle in London. This employs a 16 ton vehicle (carrying capacity 6 tons) with a range of 120 miles. The vehicle has four batteries each of 200kWh. Apart from lengthy refuelling times, electrical power requirements will present huge demands on local electric power infrastructure in terms of availability and loading (kVA) capacity.

³ Ref: TPC submission to RBC concerning a 'Revised Draft SW SPD Consultation 1st – 20th October 2020'

within the lifetime of the Local Plan. HDVs and LDVs must be given particular attention with regard to mitigating air pollution across SW Rugby.

- We wish to stress the importance of the Potsford Dam link road as a crucial mechanism to reducing traffic congestion and thereby also pollution particularly with regard to HDVs and LDVs. This requires attention in the revised SW Rugby SPD.

3. Development Classification, Assessment and Mitigation

The SPD describes a number of ways in which it proposes to mitigate the impact of pollution. Our comments are mainly with regard to 'Stage 3 – Mitigation'.

The document lists a suite of measures to be considered where appropriate:

- *Monitored Travel Plan;*
- *Measures to support public transport infrastructure and promote use;*
- *Measures to support cycling and walking infrastructure;*
- *Measures to support an Electric Vehicle Plan;*

Furthermore section 5.2 states:

The Council will support developments that are air quality neutral.

If they are not air quality neutral it is necessary to mitigate their impacts.

With reference to the highlighted text above, TPC recognises this is an admirable ambition although in reality we are concerned that it will be treated as an aspiration without any tangible guidance of how it will be invoked. For example RBC has already granted outline planning permission for the Symmetry Park development. This implies RBC must be satisfied that detailed applications will have demonstrated beyond doubt that the developer will achieve an air quality neutral situation. Otherwise permission will have to be withdrawn.

The Symmetry Park application proposes the employment of up to 2,500 people. If a logistics business, this is likely to generate many hundreds, if not thousands, HDV and LDV vehicle movements per day. Apart from the inherent business activity pollution, there will be implications to RBC's proposed Travel Plan. TPC challenges whether this will have any real significance with regard to the proposed warehouse scheme. The complex will be likely to operate 24/7, and managed using a variety of labour shift patterns. How realistically is RBC going to have any influence? Is it a meaningless aspiration without a vision for enforcement? What does 'monitored' mean in the context of 'Monitored Travel Plan'?

TPC does support a robust cycling and walking infrastructure. We have made such comments in our SW Rugby SPD critique. However this will only be developed with clear leadership and enforcement in the implementation phase of the Local Plan. Thus far, within SW Rugby, we have only seen indicative proposals, and even these do not define a timeline for their implementation.

In summary, TPC concludes that RBC's SW Local Plan, which includes proposals for the warehouses, smaller housing developments and the parcel identified as Homestead Farm, by definition cannot provide air-quality neutrality in the communities of Dunchurch and Thurlaston.

Thurlaston Parish Council Requests & Recommendations:

- We ask RBC to reconsider their Travel Plans especially with regard to how it expects to implement realistic deliverable solutions and what monitoring it will apply. Particular attention is required with regard to SW Rugby in the light of the Symmetry Park industrial complex and 24/7 operations.
- We urge RBC to reinforce the importance of clear and unambiguous plans to monitor and enforce Air Quality pollution levels.
- We urge RBC to give priority to the implementation and integration of walk and cycle ways and ensure these are implemented prior to, or at least concurrently with, main scheme developments.

In conclusion, Thurlaston Parish Council is committed to assisting in mitigating any proposals which we feel will be detrimental both to current and future generations.

We appreciate the opportunity to review and comment on the latest Rugby Local Plan proposals and remain committed to collaborative engagement with both Rugby Borough Council and its agents.

We would appreciate detailed responses to each of the 'Requests & Recommendations' bullet points and look forward to an opportunity to enter into dialogue about this submission.

Parish Clerk
Thurlaston Parish Council