



Thurlaston Parish Council  
Thurlaston  
Rugby

Email: parish.clerk@thurlaston-pc.gov.uk

28<sup>th</sup> October 2020

Revised Draft SW Rugby Masterplan SPD Consultation  
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 South West Rugby Supplementary Planning Document (SPD)  
Consultation 1<sup>st</sup> October – 29<sup>th</sup> October 2020**

Thurlaston Parish Council is pleased to submit its critique with regard to your invitation to make submissions concerning your revised SPD.

In summary, our response covers the following subject areas:

1. Design principles (particularly for industrial buildings)
2. Traffic Modelling Protocol
3. Connectivity & Highways (particularly timing for the Potsford Dam Link)
4. Sustainable Transport Corridor
5. Symmetry Park Site Access & Fire Station
6. Flooding & Sustainable Drainage
7. Utilities
8. Adjacent Development Applications (that are not part of the LP/SPD)
9. Specialist Programme Management Expertise
10. Criteria for NEAPs and LEAPs

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

**1. Section 20 & Appendix E: Design Principles**

Thurlaston Parish Council is puzzled by the premise that comments received in 2019 suggested the SPD was too prescriptive (as stated in the comparison table at the head of this section), because the view from Thurlaston Parish Council and local people was that the previous version of the SPD had insufficient design controls, which could result in damage the local environment. We can only conclude that such comments originated from development organisations. The lack of design description was, and is, especially true of the industrial parcel - we see no improvement in the revised SPD.

We include below extracts from the SPD which are particularly relevant to our contention

that your proposals are not in accordance with NPPF objectives:

- 20.1 *The 2019 National Planning Policy Framework (NPPF) has a renewed focus on the importance of good design. Paragraph 130 of the NPPF makes clear that permission should be refused for development of poor design and that design standards in SPDs should be taken into account. The Design and Access Statement submitted with planning applications within the South West Rugby allocation should make clear how the proposal has considered the design considerations set out in this SPD.*
- 20.2 *National Planning Policy Framework Chapter 12 - Achieving well-designed places concerns design. 'Building for a Healthy Life', which updates Building for Life 12 referenced in the NPPF, will be used in the assessment of applications and it is advised that applicants use this to help inform layout and design.*
- 20.3 *NPPF Paragraph 124 states that: "The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this."*
- 20.4 *"The National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. This design guide, the National Design Guide, illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools."*
- 20.5 *Local Plan Policy SDC1 requires all development to demonstrate high quality, inclusive and sustainable design. It makes clear that new development will only be supported where the proposal is of a scale, density and design that responds to the character of the areas in which they are situated.*

The comparison table also indicates that the SPD should give no further design standard guidance to developers than is contained in DS8. This is restrictive and contra to NPPF direction, as stated in section 20.1. Other paragraphs in section 20 provide guidance on site-wide design principles, residential design principles, and the need for a variety of frontages and features of architectural interest, **but there is no mention of design principles for the appearance of the industrial buildings** that will sit amongst new and existing residential areas, where the declared objective in paragraph 20.3 is to create buildings which are better to work in and acceptable to communities.

Appendix E is a brief section that repeats some of the words in paragraph 20 for site and residential design principles. There is some mention of employment design principles, but no mention or guidelines relating to the importance of appearance. The impression is that flat-topped hangers with rooftop solar power farms are acceptable – a conclusion supported by the materials for the RBC Planning Committee meeting 16<sup>th</sup> September, where illustrations were shown of sheds from various points in the vicinity of Thurlaston. Controls to encourage an attractive outcome and avoid a complex of ugly units requiring camouflage are missing. Thurlaston Parish Council urges RBC Planning to extend design principles for industrial units to comply with the Local Plan and with Paragraph 20 of the SPD. Without further guidance there is a real chance that the Borough will fail to achieve the aspirations of DS8, the SPD, and NPPF legislation.

In essence, our worry is that the lack of industrial design controls amounts to an acceptance that a warehouse will look like a shed and that camouflage paint and tree screens will be necessary to hide a “carbuncle on the face of an old friend”. A poor outcome in this regard has a direct impact on the people in our Parish.

### **Thurlaston Parish Council Requests & Recommendations:**

- **Please apply more prescriptive design controls** to achieve a better standard of living space for current and future residents, **including for industrial buildings**.

*“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.”*

These are your words. RBC has the overall responsibility for the design and appearance of this multi-developer project, and the current SPD is unclear as to how RBC plans to fulfil this responsibility.

The planners must apply corresponding design principles for industrial units to those they have for residential developments. Many industrial buildings of the past are now listed buildings; we need to set standards that the community is proud of and that attract new residents and investment.

Please be clear (‘prescriptive’) on our design expectations, **including for warehouses planned for Thurlaston Parish**. Help developers avoid poor design by describing what constitutes ‘good’, how designs will be assessed/measured, and the process for testing that stated criteria are met – including for industrial designs.

- **Please ensure that permissions are refused if designs do not meet required standards** (in the context of the defined design assessment/measurement of the previous point). The SPD states: *“permission should be refused for development of poor design and that design standards in SPDs should be taken into account”*.

## **2. Traffic Modelling Protocol (Ref: Appendix I)**

The SPD recognises the importance of traffic modelling throughout the development implementation process and for interaction with WCC Highways, on which RBC relies for roadway proposal assessments.

The concern we would like to express is with the management of this task. The implementation is a phased programme over many years, involving many developers who will work separately, and skilled oversight will be needed to achieve a positive overall outcome and avoid considerable inconvenience to residents over the coming 10-15 years. The pre-analysis for road development needs is crucial and there is a significant risk that RBC’s baseline traffic model predicted volumes are inaccurate - assessments made by other groups conclude consistently that RBC volumes are an underestimate.

Undoubtedly, evolving circumstances will raise a number of risks, including factors that feed into traffic modelling, and these may indicate altered transport needs. Employing an overall Local Plan Programme Manager would help to mitigate the risk of failing to manage the many, concurrent Local Plan developments, and evolving needs, effectively.

In summary, we are concerned that underestimating road requirements at this stage will create chaos and exasperate road commuters, who will bear the inconvenience of disruptions and queuing traffic for many years. We would appreciate insight into how this aspect of the programme will be managed. Thurlaston Parish Council has lodged numerous misgivings about the Local Plan over the past four years, many considered to be to the

detriment of resident health and wellbeing, and do not want to exacerbate this position further.

**Thurlaston Parish Council Requests & Recommendations:**

- Please provide details of how you will quality assure your current and future traffic volumes given that currently several agencies conclude they are underestimates.
- We recommend that RBC needs to address a worrying deficit in its professional project management resources. There are many cross-cutting dependent issues. There are no statements in the revised SPD which describe how these will be managed to ensure risks are mitigated.

**3. Connectivity & Highways (Ref: Section 19 & Appendix L)**

Thurlaston Parish Council has consulted various parties, including Borough Councillors, about the proposed highway developments in SW Rugby. Notwithstanding the points we raised relating to the lack of robustness of traffic modelling data, we have overarching concerns which we believe have not been properly analysed or addressed within the revised SPD.

We understand that traffic modelling issues are recognised, but the control processes to instigate the studies will have to map to development activities carefully. Our worry is that warehouses will appear first with very little change to the road system, which will lead to chaos on Coventry Road (near Thurlaston) unless oversight is applied that has authority and control over the Tritax traffic management process. We consider that it is vital, at minimum, that the Homestead Link is fully operational and Tritax will be operating a robust traffic management system. We expect RBC to offer us reassurances that they will not allow Tritax to operate without ensuring all the necessary controls are in place.

We wish to draw attention to highway design data shown in figure 9 and the indicative phasing plan shown in Appendix L.

**Potsford Dam Link & SW Rugby Implementation Phasing (Ref: Appendix L)**

We consider there are omissions in your proposed SW Rugby programme phasing plan.

Clearly Symmetry Park is a fundamental development within the plan and yet it has no parcel number or implementation timescale within your Appendix L Indicative Phasing Plan. We appreciate this scheme exists under a separate application (R16/2569), as a Local Plan sub-project, nevertheless the fact that it has to be implemented with careful recognition of many other Local Plan dependencies (such as highway improvements and remodelling) makes it imperative that all parties have clear visibility of your overall timeline/trajectory. Failure to do so would introduce fundamental project risks.

**A single plan with all the associated project critical paths is a fundamental requirement for successful deployments** – omission of this would be a serious oversight. This single plan is not included in the SPD documentation and we would urge you publish this urgently to enable a proper review of the proposed phasing and timeline. Indeed we are genuinely perplexed at your oversight.

There is no published timing for the Symmetry Park development, but we assume you will wish to see its implementation as early as practicable, and certainly before the proposed availability of the Potsford Dam Link road, which is 2031 (if implemented at all). The stretch of the A4071 between the Blue Boar junction and the Western Relief Road (A4071) is relatively narrow and constricted, and unsuitable for accommodating significant increases in traffic volumes in general and in HGV traffic that would be expected during the

Tritax warehouses development and the anticipated BAU traffic thereafter. By 2031, almost 3,400 new homes will have been built in the locale, and over half of these will have been completed for 5 years, introducing considerable additional weight of traffic. The delayed completion of the Potsford Dam Link is a grave concern for Thurlaston: we consider this link to be vital and that it should be allocated a much higher priority and earlier implementation.

In support of these concerns we reference **RBC Planning Committee Meeting 16th September 2020 Extract: Agenda Item 1, Section 7.39** and this extract:

*In relation to the Blue Boar, A4071/Straight Mile junction Warwickshire County Council advise that there are currently capacity issues at this junction and that this would worsen due to the proposed development. The Transport Assessment proposed the provision of a roundabout in this location. However, Warwickshire County Council advise that the provision of the Potsford Dam link will reduce traffic at Blue Boar and that priority should be given to the delivery of the Potsford Dam link rather than a new roundabout. The Potsford Dam link also addresses concerns previously raised regarding the impact on the gyratory.*

We also reference **RBC PSD05 Warwickshire Minerals Plan (March 2020) Background Information Paper**: Here, RBC raises a list of issues in relation to WCC Site 1 (Bourton on Dunsmore) that have a significant impact on the SW Rugby SPD, as follows:

- *It is unclear as to whether all potential highways impacts have been identified and subsequently mitigated;*
- *the RBC Local Plan has been subject to extensive highways modelling produced in partnership with WCC Highways;*
- *RBC consider that the Minerals Plan should be subject to traffic modelling prior to allocation in the Plan, rather at the planning application stage;*
- *It is unclear as to what extent any potential impacts the proposed mineral allocations may have on the emerging Local Plan;*
- *Sites 1 and 2 are within close proximity of the proposed Rugby South West allocation for 5000 homes and 35Ha of employment land;*
- *RBC is particularly concerned that Sites 1 (Frankton Straight Mile) and 2 may start at a similar time to the South West Rugby allocation, but before South West Rugby highways mitigation work has finished, including the South West Rugby link road;*

and

- *At this stage it cannot be anticipated if, and when, quarrying operations would commence. However, the justification text relating both sites identifies mitigation for potential cumulative effects of working both concurrently, by later development at Site 1 and earlier development at Site 2, during the Plan period. Discussions with Highways England have covered some of the potential impacts on the SRN given the proximity to the A45, including loading on the A4071 (Blue Boar) overbridge.*
- *In discussion with WCC TP, the MPA understands that that Rugby SW will be accessed off the A45 via the B4429 junction. This is reflected in the road layout for that development. However, HGVs accessing and egressing Sites 1 and 2 would be routed on and off the A45 from the A4071 Blue Board interchange. This routing is specified in the requirements of Policy S1 and S2.*

In relation to the Blue Boar, A4071/Straight Mile junction, Warwickshire County Council advise that there are currently capacity issues at this junction and that this would worsen due to the proposed development. The Transport Assessment proposed the provision of a roundabout in this location. However, Warwickshire County Council advise that the provision of the Potsford Dam Link will reduce traffic at Blue Boar and that priority should be given to the delivery of the Potsford Dam Link rather than a new roundabout. An earlier

completion of the Potsford Dam Link would address previous concerns relating to the impact on the gyratory, with the following list of benefits:

- Provides additional safe access for goods vehicles (HGVs and distribution vans) serving Symmetry Park;
- Helps to alleviate issues associated with the inadequate design and exceeded capacity of the Blue Boar junction;
- Avoids the need to widen the Blue Boar end of the A4071, which is unsuitable for increased heavy HGV traffic movements;
- Provides ready access to N/S bound traffic into and out of Symmetry Park;
- Reduces HGV noise pollution to residents on the Coventry Road (B4429) and Thurlaston village;
- Provides additional traffic capacity at Symmetry Park for the hundreds of local distribution vehicles which will travel on the north side (whereas the Homestead Farm Link will predominantly serve the east).
- Provides benefits to local communities by opening a N/S highway from the B4429 to the Western Relief Road and onwards north bound to the A426 Leicester Road.

There is scant evidence of a joined-up approach between the WCC's Warwickshire Minerals Plan and RBC's SPD Potsford Dam Link plans. Although both schemes reference a *Duty to Cooperate* with each other, the revised SPD pays little attention to the overall impact on traffic in the area. It is unsatisfactory that these critical issues are left open and unresolved.

#### **Thurlaston Parish Council Requests & Recommendations:**

- **Please bring forward the date for completion of the Potsford Dam Link Road** and treat it as a fundamental prerequisite for implementation of both the Local Plan and Minerals Plan industrial developments, and help mitigate current issues from the cumulative effects of increasing traffic volumes.
- **Please take a more holistic approach to traffic modelling and volume estimates**, especially accounting for all Local Plan and Minerals Plan developments in the area.
- **Please ensure respective government organisations succeed genuinely in working co-operatively**, particularly RBC and WCC, and that the implementations, which serve both industry and local communities, are executed without introducing unnecessary risk. Regrettably we see no evidence of a genuine commitment to respect your *Duty to Cooperate*.
- **Please insert a single plan for all the associated project critical paths.** This is missing from the current SPD documentation and is needed urgently in order to complete a proper review of phasing and timeline. This is a fundamental element for the development of a quality risk containment plan.
- **Please provide details and outputs from Tritax traffic management system** to demonstrate that from the commencement of warehouse operations there will be

robust control processes to ensure vehicle movements are within agreed parameters.

#### 4. Sustainable Transport Corridor / Link

There are numerous references to a Sustainable Transport Corridor/Link, shown on your phasing plans as a black broken line. It is a term frequently used, but there is no clear definition/specification. This is what the RBC documentation states:

*... with regard to pedestrian and cycle facilities pedestrian and cycle facilities will ultimately be provided along the proposed Sustainable Transport Corridor and Homestead link. However, until these are provided Warwickshire County Council comment that improved links can be provided either along the existing public right of way, Northampton Lane or by improvements along Coventry Road between Windmill Lane, part of the national cycle network, and the Symmetry Park. These improvements would be required prior to first occupation unless the Homestead Link and Sustainable Transport Corridor are provided prior to first occupation.*

and

*The STL is a requirement of DS9, to provide fast and efficient bus access to serve the proposed South West Rugby allocation. It is also required to provide a safe and attractive route for pedestrians and cyclists, connecting the employment and residential elements of the allocation. It is not proposed to enable general traffic to use the STL as a through route as this would potentially reduce the attractiveness of bus as an alternative to the private car and make the route less attractive for pedestrians and cyclists.*

#### Thurlaston Parish Council Requests & Recommendations:

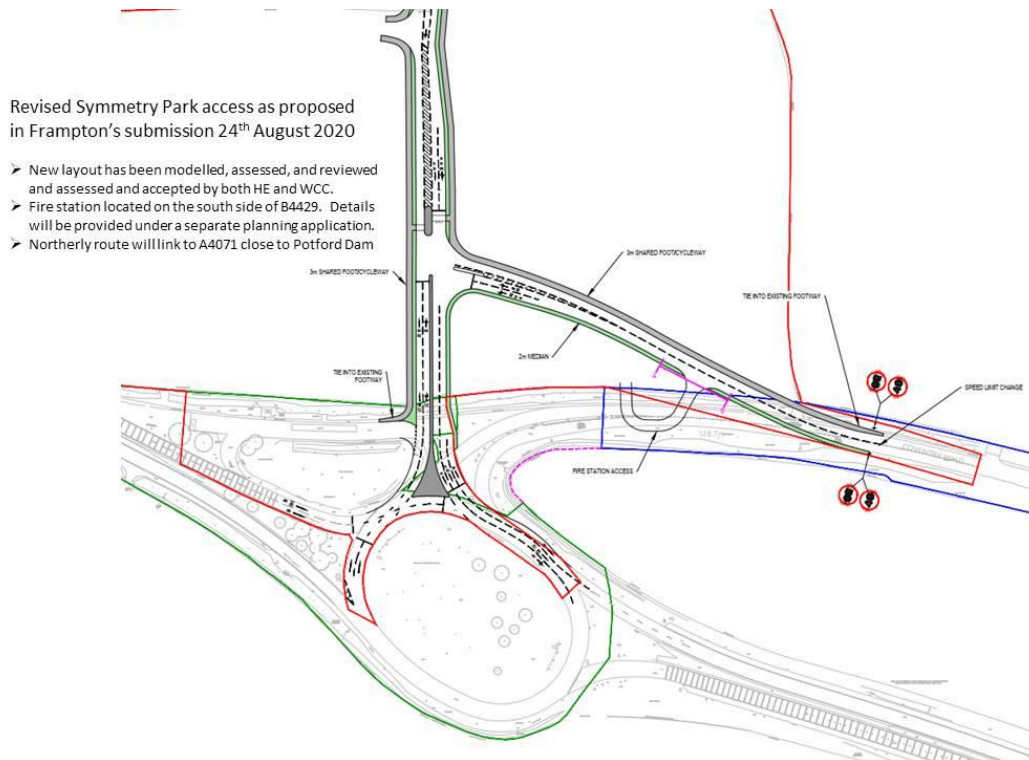
- **Please provide an indicative STL design specification** that explains what will actually be provided, and which parts of the obligation will be fulfilled prior to Symmetry Park becoming operational.

#### 5. Symmetry Park: Site Access and Fire Station

We believe there is an anomaly in the various versions SW Local Plan SPD schematics in respect of the road design and fire station location. In September RBC approved the Tritax R16/2569 planning application and tacit with this we assume the latest submitted drawings, approved by HE, are those that will be implemented.

On the following page there is a diagram from the Tritax report.

Of particular note is that the fire station location is shown on the south side of the remodelled B4429. This differs to your SPD figure 2 which shows the old layout with the fire station on the north side. We respectfully suggest you should quality assure your schematics for accuracy and consistency. In previous submissions we have recorded that Thurlaston and Dunchurch residents have raised concerns about the chicane effect of the revised junction layout and its overall safety. Vehicles travelling from the west will now have to drive into a trading estate, wait for the volume of traffic exiting the estate, before they can make a right hand turn onto Coventry Road. This could create queues of HGVs trying to enter the estate.



### Thurlaston Parish Council Requests & Recommendations:

- **Please provide a more detailed description of how traffic will be managed at the junctions shown on the diagram above** (an indication of queue lengths at peak anticipated traffic volumes times and what traffic control measures will be applied (e.g. traffic lights) would be appreciated).
- **Please confirm which of the SW Local Plan SPD schematics shows the correct road design and fire station location.**

### 6. Flooding and Sustainable Drainage (Ref section 12)

We note your recognition of the need to mitigate the risk of flooding both in the immediate vicinity and surrounding area. Reference is made to consulting with the Lead Local Flood Authority to identify potential hydrological mitigation, particularly with regard to Draycote Meadows. This is commendable, but has RBC accounted for similar comments that were made relating to WCC's proposed Minerals Plan excavations? To quote from WCC's proposals which have been reviewed by RBC:

*Extraction of sand and gravel is unlikely to cause harm to the SSSI, but provision of suitable measures to protect and where possible enhance the special features of Draycote Meadows will be required. Any hydrological and water quality issues associated with the SSSI will need to be addressed at the planning application stage. A protected species survey of the site will be required.*

Thurlaston Parish Council is not suggesting an error in the proposals individually, but is concerned that a holistic assessment is needed, but has not been undertaken, with input from all relevant agencies – i.e. that both local organisations are assessing the same area but have not actually consulted together regarding the overall impact of the two schemes.



## Thurlaston Parish Council Requests & Recommendations:

- **Please confirm that both RBC and WCC will assess the risk of flooding both in the immediate vicinity and surrounding area and consult together with all the relevant agencies with the regard to the overall impact of the two schemes.**

### 7. Utilities (Ref section 24)

The only reference to utilities in the SPD is found in Section 24, as follows:

*Existing utilities are located within the allocation, including overhead electric cables, sewers, water mains and a buried chalk slurry pipeline owned by CEMEX. All these features will need to be addressed as part of the development of the allocation either through retention with suitable easements or through diversion in agreement with the respective statutory providers. Utilities serving the existing properties will also be removed, retained, or upgraded as required. Other utilities are located within the highway network and diversions will need to take place as required to deliver the highway access. It is strongly encouraged that developers engage with utility providers at an early stage to ensure required works are carried out. Local Plan Policy SDC9 requires broadband to be provided in new developments.*

The above paragraph is perfectly valid, but is too brief, given the extent of the SPD plans. Existing residents are very concerned about possible impacts on utility services as a result of major developments.

For example, Thurlaston residents already suffer low water pressures, especially throughout the summer. Severn Trent recently initiated a design improvement to the supply system to improve capacity and resilience and address the longstanding problems properly.

We had pointed out to RBC during the consultation for the planning application R16/2569 (Tritax Symmetry) that we felt there was inadequate consultation with all necessary relevant utility providers. In the referenced planning application, only the asset guarding department of Severn Trent was consulted. Severn Trent's response was that they were happy that the proposals did not interfere with existing infrastructure. There was no exchange regarding the quantity of treated water that the development would require.

An overall concern is that it is unclear when utility companies will receive full details, including associated utility needs, for all the industrial and residential developments across SW Rugby. All providers, whether water (clean supply and sewage management), gas, electricity, and telecommunications, will need to ensure that they have the infrastructure in place to provide the required capacity and resilience. Such assessments need to be completed as prerequisites, prior to implementation. Potentially there will be multiple infrastructure planning applications and contractors involved, and the potential for individual utility providers to plan independently rather than as part of a RBC controlled masterplan.

Utilities will continue to be a prime concern as we go through a long period of civil engineering activity. From a residents' perspective, we are concerned about the potential for chaos and disruption to our services. We need to be reassured that RBC has all the required controls in place to ensure an orderly phasing of these works with a proposed timeline for their implementation. Tacit with this is a requirement for an integrated public-facing communications plan and risk containment strategy. Only then can we be reassured that local communities will not be subject to risks, such as poor water supply, power cuts, broadband shutdown, and drainage overflows and that RBC is in control with comprehensive risk mitigation plans.

**Thurlaston Parish Council Requests & Recommendations:**

- **Please provide a clear strategic plan for the management and development of infrastructure utility services.** Currently this omission presents a significant risk, not just to the success of the SW Rugby implementation, but to the extant residents in the localities affected.

**8. Adjacent Development Applications that are Not Part of the LP/SPD**

There are additional development applications adjacent, or close, to SPD developments, but that are not part of the LP or SPD. The Site Wide Design Principles of Appendix E should apply to these development applications, and their impacts on additional infrastructure and service needs should be assessed alongside developments that are part of the LP/SPD.

**Thurlaston Parish Council Requests & Recommendations:**

- **Please apply the “Site Wide Design Principles” of Appendix E to development applications that are adjacent, or close, to SPD developments, but are not part of the LP or SPD.**
- **Please consider development applications that are adjacent, or close, to SPD developments that are not part of the LP or SPD when determining/estimating additional infrastructure and service needs.**

**9. Specialist Programme Management Expertise**

The SPD implementation is a phased programme over many years, involving many developers who will work separately, and clearly the largest project of its type that RBC will have undertaken. It is vital that skilled oversight is installed to achieve a positive overall outcome and avoid considerable stress and inconvenience to residents over the 10-15 years or work. We are disappointed that RBC does not plan to employ specialist management resource with the right skill-set and experience for this task, as was done for the Houlton site developments.

What is needed is an experienced Programme Manager who has handled multi-faceted developments of this type and magnitude before, and has the skill-set and track record to rise to the challenge successfully. Without proper oversight, there is a high risk that the diverse, concurrent developments will fall out of step, programme risks will be introduced, and new and existing residents will have to bear an extended period of disruption. As it stands, the SPD fails to explain how implementation difficulties will be managed and satisfactorily managed and resolved.

Undoubtedly, the implementation has many risks and developers are likely to hit problems that cause extra, unplanned work and delay, which might be mitigated in part through skilled insight.

**Thurlaston Parish Council Requests & Recommendations:**

- **Please reconsider employing an experienced and skilled Programme Manager** who has handled multi-faceted developments of this type and magnitude before and has the skill-set and track record to oversee the SPD developments planned for SW Rugby.

## 10. Criteria for NEAPs and LEAPs (Ref Appendix F)

We make comments on this section to highlight the opportunity the Borough has to enhance the leisure time of youngsters and provide a great environment for those caring for young people to meet and develop the characteristics in our children that group play in an outdoor environment encourages.

The appendix references a document, RBC's *Play Strategy and Field in Trust Guidelines*. We couldn't find this policy document on the RBC website but did find a draft report produced by the *Planning for Play Task Group* produced in 2011, showing that 60% of residents consulted said they didn't think there were enough areas for play. The document did not ask questions about the type of equipment preferred by potential users – in fact it refers to a planned consultation for 'Play Strategy' that was planned in 2012, but there was no obvious evidence that the consultation took place.

Appendix F quantifies the number of pieces of equipment for a NEAP and a LEAP but fails to indicate to developers what equipment would be most suitable for and appreciated by residents. A consultation on current preferences is required. There is a danger that unwanted devices are installed and that they receive little usage.

The equipment should consider the seasons too. The medium of water can provide tremendous fun for children on warm summer days. We remember the time when the water fountain system existed at Whitehall Recreation Ground. Not everyone can afford to join a David Lloyd Club to get the outdoor water experience which has been approved for the Houlton site. Young parents are desperate to get their children close to some water during the summer.

We observe that the SPD (section 10, table 2) does not provide any allocation for outdoor sports. It assumes that this can be provided by school fields in the region with guaranteed public access or an extension to existing sports clubs. We consider this assumption dangerous. For example we are aware that during the development of the Local Plan a prominent rugby club came very close to selling its ground for development. If RBC is assuming that it is providing open spaces via local sports clubs then they must safeguard this assumption through a formal legal process such as *Fields in Trust* or similar. The opportunities for our young people to enjoy the availability of outdoor sport is paramount.

### **Thurlaston Parish Council Requests & Recommendations:**

- **We urge RBC to be more ambitious and provide an all-round experience for children and carers.**
- **RBC must safeguard its provision for outdoor sports which may be achieved via local sports clubs with a legal guarantee.**

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. Regrettably, resident angst remains high, and your proposals do little to promote the wellbeing of our residents.

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 Tritax Symmetry 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