



Thurlaston Parish Council
Thurlaston
Rugby

5th February 2021

Ms Karen McCulloch
Development Team
Rugby Borough Council
Town Hall
Rugby

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

Dear Ms McCulloch,

**Rugby Borough Council (RBC) Planning Application R20/1026
Units 1 & 2 Tritax Symmetry Site – Land North of Coventry Road, Thurlaston**

This document is Thurlaston Parish Council's (TPC) submission with regard to planning application R20/1026. Our report raises a number of concerns and objections to the Applicant's (Framptons) request for Full Planning Permission.

Various RBC policy and planning documents are relevant to the application – most notably the Rugby Local Plan and the SW Rugby Supplementary Planning Document (SPD). However at the time that TPC undertook its review of R20/1026 we cannot ascertain whether your draft SPD has been formally ratified and adopted. The SPD is key to the South West Rugby Allocation and it would seem premature and improper for the Council to consider this application prior to the consideration and adoption of the SPD, particularly as the application conflicts with aspects of the draft SPD. Our contention is that a number of issues raised by the Applicant and RBC's R16/2569 Decision Notice are unresolved, but are contingent on approval for Full Planning Permission being granted.

Our observations:

- Building Design is not sympathetic to the locality;
- Unit 1 Site design is potentially hazardous;
- Road model and site access are not safe;
- Public Rights of Way (PROW) reinstatement is not defined;
- Variances with regard to SPD requirements.

Building Design

The Applicant has requested permission for RBC to revoke its planning condition (6) to revert the heights of the warehouses to their original proposals, albeit the Applicant previously proposed height reductions which RBC accepted. TPC objects to this further request for exactly the same reasons that we made in our previous R16/2569 submission (dated 10th March 2020). The visual impact of these 20% and 23% height increases would irretrievably harm the landscape if this change is granted.

This is not an issue that can be placated on purely commercial grounds. The Applicant will be aware

that over recent years demands for logistics services have increased; the impact of the current pandemic may accelerate the process. There is therefore nothing which is materially new, so planning permission should be withheld. The Applicant's commercial objectives and purpose of the facility have not changed.

The Applicant has paid insufficient attention to Planning Condition 9 which requires that the Local Planning Authority will need to approve the colour and finish of materials used on external surfaces. The indicative colours shown in the Applicant's proposals may be acceptable within a large industrial conurbation; however they are not sympathetic to a rural green landscape. The Visual Impact Assessment demonstrates the warehouses are invasive, and tacit with this, the Applicant is attempting to invoke a damage limitation solution to mitigate the harm that the proposed warehouses will have on the locality. The proposed bunds and tree planting are primarily being proposed to control visual pollution. Conversely RBC has not set any standards for acceptability.

Unit 1 Site Design

Changes to Unit 1 site design are proposed. The Applicant admits the revised building footprint is tight for the size of land allocation, indicating that turning space for HGVs is limited. The indicative quoted traffic volumes are questionable, particularly when all data are aggregated to include HGVs, LDVs (mainly for distribution and will significantly outnumber HGV volumes), and staff vehicles. The business is expected to operate 24/7 – indicating that for many shift based employees public transport is likely to be unavailable.

The proposed single in/out access route to the site will present congestion issues. Vehicle management during (sometimes unforeseen) busy periods is not addressed. For example, the ability to manage multiple concurrent HGV arrivals at the same time as managing LDV distribution and other motor vehicles is not addressed. Likewise, present road regulations may require drivers to take rest periods to avoid exceeding their allowed driving hours. These circumstances must not be allowed to 'spill' onto nearby roads. Roads may become unsafe and an annoyance to residents. The current design should be improved to ensure these issues are addressed and supported by a risk mitigation scheme. Condition 14, 23 & 24 refer, and Travel Plan 'to encourage sustainable transport'.

There is a requirement that any external lighting shall be designed in such a manner that it will not cause light nuisance to nearby residential properties (Informative 4). External lighting is an important issue, particularly if the site is in operation 24 hours a day, and whilst we understand there is a balance between light pollution/visual amenity and safety of workers on site, we question what is being proposed. Various luminous levels and light wavelengths are indicated but these require context in terms of light spread, leakage, and overall nuisance impact. The Applicant's submission states that lighting levels are indicative (described as 'lighting levels should be as follows'). Whilst we appreciate that the warehouses will operate 24/7 it is important that Thurlaston Parish maintains its 'dark sky' landscape. This is a very important consideration for both residents and wildlife – indeed it is one of the main reasons why parishioners choose to reside in the Thurlaston rural location. Planning Statement 5.12 must comply with this requirement.

Road Model & Site Access

We consider the single access road to Unit 1 is unsafe. Remodelled SRN highways (A45/M45) have Highways England (HE) approval. However the Coventry Road (B4429) has two close proximity access

points (Unit 1 and Fire Station) approximately 150m east of the SRN junction which fall under WCC Highways responsibility. HE objected to the original SRN access design because of the risks of vehicles stacking. TPC's contention is that a similar unsafe situation is now being proposed on the B4429 and presents the following points:

- Potential HGV stacking on a compact multi-junction section of the B4429 presents unacceptable risks. We expect WCC Highways to review/comment on the change to the roads layout as it causes a fundamental change in impact on roads for which it has responsibility.
- Unit 1 site allocation is restricted and offers little capacity in the event that vehicles need to stack during peak period traffic volumes and/or a restriction on to the site - perhaps simply as an accrual of drivers exceeding their drive time allocations. We reiterate that this single entrance will serve staff motor cars, HGVs and LDVs. Traffic signalling may help alleviate the problem, but cannot mitigate against traffic congestion, potential dangers and nuisance to the local community.
- TPC has previously raised concerns about the chicane effect of the B4429 design, the proximity of the proposed Fire Station access road, a new housing scheme on the site of the old Dunsmore Garage, and the T junction onto Main Street, Thurlaston. Normal B4429 east/west traffic to Thurlaston and Dunchurch coupled with the logistics complex contribute to making the proposed design unsafe. It's not just a capacity issue but one of overall vehicle volumes in a busy multi-junction area at peak travel times. Notwithstanding Condition 18, and the inadequacies of the proposed design, the layout does not provide scope to make further adjustments should these be deemed necessary over the ten year term of the Local Plan. In essence the road model shows the B4429 constrained in close proximity to the boundaries of a zone between Unit 1 and Fire Station allocations. There is very little available space to provide scope for future road modelling adjustments. The proposed design does not provide mitigation of this risk. We request that the proposed design should not be approved until all risks have been addressed and mitigated.
- The Unit boundaries are described as being protected by 2.4m high block paladin security fencing, and Unit 1 with single access onto the B4429. This implies there is no provision in the design for access from the proposed Local Plan Sustainable Transport Link Corridor. Users of this route will therefore have to circumnavigate the site to gain access. Conversely Unit 2 does allow access from the north side of the site. This design weakness should be addressed.
- Unit 1 site congestion / overflow will encourage HGV and LDV drivers to seek residential parking (Ref: Condition 18).
- Condition 15 requires an HGV routing strategy for vehicles with a gross weight over 3.5 tonnes. A strategy¹ requires adoption and a detailed implementation plan which provides reassurance that an acceptable traffic routing strategy will protect Dunchurch and other neighbouring localities from pollution and congestion during all phases of the development of Symmetry Park.

Public Rights of Way

The Applicant and RBC recognise that there are PROWs which will require reinstatement (Design & Access Statement 3.8, Planning Statement 5.46, 5.47, Conditions 14, 25, 26, 30). With regard to R20/1026 the affected PROW is R168 which traverses along the east boundary at Site Unit 1 to and across Northampton Lane. Beyond Northampton Lane the PROW heads north west in a direction

¹ The draft SPD requires the implementation of a traffic management strategy prior to Symmetry Park becoming occupied. The 3.5 tonne vehicle weight requirement will apply to all B4429 HGV traffic which includes extant traffic connecting to the A426 (e.g. serving Sainsburys Dunchurch Superstore) and A45 (southbound).

which will cross the Symmetry Park allocation planned for Units 5, 6, & 7. This latter section requires rerouting.

Reinstatement of R168Y is not addressed within this Full Planning Application. It will however be a material consideration should Units 3 to 7 be implemented. TPC requests that planning for the PROW requires resolution now to ensure an overall satisfactory solution is established for the whole of R168 and Symmetry Park.

TPC proposes that R168Y should be reinstated by continuing northwards from the proposed Pegasus junction towards Potsford Dam, potentially the same route as proposed for the Potsford Dam Link.

TPC has had informal discussions with Ward Councillors and with Sustrans with a view to linking R168 route with an extended Sustrans Route 41 leg. In January 2021 TPC took the opportunity to discuss this proposal with Sustrans, prompted by RBC Planning Application R20/0914. If completed the extension would link Draycote village to Cawston along the route of the disused rail line. In essence it will provide a continuous off-road route from Rugby to the Offchurch Greenway. Obviously Sustrans will require support from local authorities, nevertheless they gave every indication they would wish to engage in progressing the scheme. The proposal aligns with SW Rugby draft SPD which in 19.3 states:

Policy DS9 sets out the requirement for a comprehensive spine road network, and its allocation is an integral part of proposals for the site. Links from the allocation into the existing pedestrian and cycle network within and near to the allocation will be required, including the Sustrans National Cycle route 41, together with a route along the disused railway line to the West of the allocation, known as the Cawston Greenway.

TPC requests that an holistic approach is taken now to assess the opportunities for bringing the Symmetry Park application, the SW Rugby SPD, and Local Plan into a consolidated cycle and footpath network with a view to engaging other agencies to progress project planning – inter alia this will include engineering assessments, financial implications, and funding. This is the raison d'être for Sustrans existence.

Without prejudice to this response, S106 contributions towards upgrading parts of the existing PROW network are requested.

SPD Compliance

The successful implementation of R20/1026 requires a number of dependent infrastructure issues to be determined and implemented prior to the occupancy of the premises and the operation of logistics services.

In the absence of any public domain information TPC has had to assume that the revised draft SW Rugby SPD is still undergoing ratification and therefore not formally adopted. Even so, the SPD is a strategy document, not a project plan. Inevitably the strategy will require significant resources to produce a number of detailed project plans to cater for all the SW Rugby Local Plan products. Tacit with this is a requirement for a critical path timeline to ensure that all the relevant workstream dependencies are appropriately phased.

This current position raises a significant number of risks. In considering R20/1026 several

underpinning infrastructure requirements are not defined. Examples include, but not exclusively:

- Locality highways which will serve Symmetry Park are indicative with no detailed phasing plan. The SPD specifies certain roads will need to be in place prior to Symmetry Park occupancy.
- The Travel Plan, when available, will be an aspiration without resources for enforcement. (Conditions 23 & 24).
- Traffic Model is known to be outdated without indication of it being refreshed both prior to and after the implementation of major developments.
- With regard to air pollution we expect measurements to be recorded at the Thurlaston junctions prior to and post implementation of Symmetry Park.
- There is no holistic pan-Rugby HGV Routing Strategy to assess (Conditions 15).
- An holistic assessment of traffic modelling is not available which recognises R20/1026 in the context of other developments – such as Local Plan housing developments, WCC Minerals Plan, and the thresholds for the implementation of roads such as the Potsford Dam link, in part to relieve A4071 constriction between the Blue Boar junction and the Western Relief Road (Condition 18).
- The Sustainable Transport Corridor/Link is absent in the Applicant's proposals, albeit RBC indicates it will in part serve Symmetry Park.
- The SPD defines building design standards for domestic properties; there is no guidance or assessment criteria for business properties.

TPC recognises the enormity of these tasks and we use this opportunity to repeat our SW Rugby SPD recommendation (27th October 2020) in which we stated:

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.

Conclusion

Full Planning approval for R20/1026 should be refused until such time the points identified in this document are fully addressed and resolved.

Yours sincerely,

Parish Clerk
Thurlaston Parish Council