



Thurlaston Parish Council
Thurlaston
Rugby

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24th March 2021

Joanne Orton (Posted by email to joanne.orton@rugby.gov.uk)

Development Team
Rugby Borough Council
Evreux Way
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CV21 2RR

Dear Ms Orton,

Rugby Borough Council Planning Application R21/0152
Thurlaston Meadows Care Home, Main Street, Thurlaston, Rugby, CV23 9JS

This document is Thurlaston Parish Council's (TPC) submission with regard to planning application R21/0152.

Our recommendation is that planning permission for R21/0152 should be denied.

Our observations:

- Substantial harm to the Thurlaston Conservation Area.
- National Planning Policy Framework compliance.
- Adverse harm to the character and appearance of the area in respect of the building environment and the natural environment.
- The sustainability and safety of the location for the proposed developments and the associated business expansion on this small rural community.

Thurlaston's Heritage

The site lies within the Thurlaston Conservation Area. By Section 72 Planning (Listed Building & Conservation Areas) Act 1990, the Council must pay special attention to preserving or enhancing the character and appearance of the area. Moreover, there is a policy requirement in the NPPF (para.193-194) to ensure the Conservation Area is not harmed by development within it or within its setting.

Thurlaston is a modest scale rural settlement which comprises 133 houses and a population of less than 300 people. It has two significant businesses: (i) a farm located on the edge of the east side of village at the end of Church Lane, a cul-de-sac; and (ii) a Care Home which is the business operated from the Applicant's site. Notwithstanding the need to protect the Conservation Area in all aspects, tacit with this is the need to ensure that the rural setting and tranquillity at the centre of the Conservation Area is also conserved.

The Applicant proposes to expand Care Home activities which will require a significant increase to its extant building footprint. In addition an expansion is proposed to the workforce and the creation of a 22 vehicle staff car park located adjacent to a private dwelling¹ is not acceptable. The impact of this large scale commercial development at the heart of the settlement will be intrinsically harmful to the character and nature of the village. Whilst perhaps not a main consideration with regard to R21/0152 we raise concerns that approval of this application will set a precedent for future large scale incremental development creep.

The Impact on the Character and Appearance of the Area

This site and proposed buildings will be visible from a number of public vantage points – notably Main Street, Biggin Hall Lane and the public right of way (R310) to the west.

To the east of the site an enlarged access entrance is proposed leading to Main Street at a location at the ‘heart’ of the village and Conservation Area. This will expose the site visually from Main Street. There is a requirement to remove parts of the extant brick wall and reinstatement to form a wider entrance. We note the requirements of the Thurlaston Village Design Statement:

- *Boundary walls along Main Street; around the Nursing Home site; and around Stanleys Farm site should remain as important elements in the street scene. The Nursing Home boundary wall is described as a ‘Significant Wall’ which is a fundamental element of the overall street scene.*
- *The materials used for external areas around buildings should reflect the rural character of the village.*

The changes to the wall and roadside green verge will visually harm the street scene. The enlargement of the site access will present views from Main Street of the paraphernalia and artefacts on the Care Home site – for example the visually unsympathetic building entrance canopy, the trappings of business activities (such as kitchen vehicle deliveries, refuse vehicles, pharmaceutical deliveries, ambulances, motor cars). Whilst not described by the Applicant the proposed design of the building indicates that both residents and casual visitors will be expected to share common ‘front of house’ space with trades-people.

The purpose of Local Plan Policy NE3 is to ensure that significant landscape features are protected and enhanced and that landscape design is a key component in the design of new development. Planning applications will be required to submit a landscape analysis and management plan in appropriate cases. The Council has a strict policy on landscape protection which draws upon various landscape studies as part of its supporting evidence. The Applicant has not presented a ‘Landscape and Visual Appraisal’ and only limited commentary on the site context in the ‘Design and Access Statement’.

TPC has provided with this submission an independent Landscape and Visual Appraisal². At the time of compilation of this report it did not specifically consider the buildings proposed in R21/0152, most

¹ *Drawing 3703-105 is incorrectly presented. The woodland area shown at the southern end of the site is not woodland but the location of a private residence known as Beechwood House. The proposal has a substantial negative visual and landscape impact for the residents of this property. We lodge objections to the proposed car park which will be used 24/7 with the potential impact of noise, vehicle pollutants, and artificial light. Thurlaston is a ‘dark sky’ settlement and this must be respected. The Applicant also intends to mount electric vehicle charge stations on a shared boundary which is also objected to for similar reasons.*

² Landscape and Visual Appraisal for Thurlaston Parish Council.

notably the impact of the two storey west wing extension to the Care Home. However the impact of this new building will introduce an additional negative visual impact which will be detrimental to the Conservation Area and summarised below:

- A two storey building extension at the centre and highest point of the site.
- Introduction of the development will lead to further changes in character at the site, including the introduction of suburbanising features such as buildings, roads, parking, and entrance access from Main Street.
- Negative effect on views which are noted within the Conservation Area Appraisal.
- Change in the character of the site as viewed from public footpath R310/1.

The report also states views are available from the neighbouring streets as well as the public footpath which crosses the site. Main Street, Biggin Hall Lane, and Church Lane all have views of the site. The western edge of the development site (i.e. proposed extension) is also exposed to views from the surrounding countryside to the north.

It was found that the proposed development would have an adverse effect on views from Main Street (Viewpoint A), Biggin Hall Lane (Viewpoints B and C), and public footpath Thurlaston R185/1. Views from Biggin Hall Lane are considered particularly sensitive as they are all noted in the Conservation Area Appraisal.

Sustainability

The Government's National Planning Policy Framework recognises three overarching objectives to sustainable development: economic, social and environmental, which are independent and need to be pursued in mutually supportive ways.

The site's location within a small rural community around a Conservation Area is a significant consideration for this application. Thurlaston has never been, or intends to be, a major business contributor within the borough because of the lack of support services and limited accessibility by means other than the private car. It is not earmarked for development in the Rugby Local Plan. TPC would like to encourage young families to move into the settlement and create a more balanced demographic profile. The relevance of the Applicant's claims of being congruent with building a strong, competitive economy, and the promotion of healthy communities is an unsubstantiated conclusion. Indeed, villagers use their endeavours to protect the settlement for residential purposes, rather than making the place busy with commercial schemes. The village infrastructure is not conducive to such developments.

Ecology

The Applicant has provided an ecological assessment pertaining to the site. Our contention is that the report is superficial and incomplete. It calls into question declared a priori assumptions. The community has not been consulted in any aspect of the development of this Application, which is unfortunate given there is resident wildlife expertise and knowledge pertaining to the site.

We record that TPC requested access to the proposed site to allow a professional ecology expert to undertake a detailed and independent appraisal. On 18th December 2020 RBC informed TPC that the Applicant refused access for this purpose. This refusal, and the enclosed desk-based review of the accuracy and conclusions of Eastdene's eco reports, calls into question the validity of Eastdene's eco reports. Against this background TPC has commissioned its own professional desk-based ecology

appraisal³; this is included here as part of our R21/0152 submission.

Highways Assessment within the Conservation Area

The Applicant's planning submission does not provide a traffic management appraisal of the impact of the development either within the village or on the Care Home site. Both require consideration.

On 28th February 2020 WCC provided a report⁴ on the impact of widening the access to the Care Home from Main Street. TPC concluded it was largely a desktop assessment. It quotes the speed limit as 30mph whereas in 2014 WCC gave approval for a reduction to 20mph throughout the whole settlement. The speed reduction was based on assessments with regard to Department of Transport criteria which cover:

- History of collisions, severity, risks and causes;
- Road geometry and engineering – in Thurlaston there are a number road constrictions, single track carriageways, and areas of limited visibility;
- The road infrastructure is used by all vehicles, irrespective of size or weight;
- Presence of vulnerable road users – in Thurlaston there are pedestrians, horse riders, cyclists, and wheelchair users which have to use 'shared space' with motor vehicles;

The holistic impact of the proposals have not been considered, most notably that Thurlaston is a linear village that ends in a cul-de-sac. The lack of a through-road has a detrimental impact on traffic management, safety and parking. Most roads within the Conservation Area are single track, some with minimal passing places and no pavements. Public service vehicles such as buses and gritting vehicles are not able to service the village due to road narrowness and absence of a turning place. RBC provides reduced size refuse vehicles to access parts of the village. The single village access road presents a safety issue in the event of it being blocked or unusable. Emergency vehicles cannot support the community, and tacit with this is care of Older People.

In addition there are traffic constraints particularly in regard to commercial vehicles and requirements to service the Applicant's facilities. Physical constraints present a number of challenges with regard to daily traffic management, parking and safety.

The main northern site access proposed for the expanded business will use a shared entrance off Main Street for all service vehicles (provisions and goods, ambulances, refuse vehicles, motor cars) pedestrians and wheelchair users. The photographs below demonstrate difficulties with the current situation. There are regular daily flows of vehicles in and out of the site. Apart from nuisance and highway congestion there are significant safety issues and periodic damage to verges.

Currently public and residents use the southern entrance and in doing so are protected from trades-vehicles. The proposed duality of use of the north entrance will compromise safety particularly for pedestrians and wheelchair users, and therefore considered unsafe.

³ A desktop critique of the planning application and reports for the proposed Thurlaston Meadows development

⁴ WCC letter reference 423, 28 Feb 2020.



*Examples of routine HGV deliveries on 15 March 2021.
The narrow village road necessitates large vehicles reversing into the site.
There is little 'swing space' off or on site to turn large vehicles round.*

On the Care Home site the Applicant proposes a design⁵ which puts constraints on vehicle movements. The kitchen and refuse locations are at the west side of the building thus requiring HGVs (eg catering suppliers as shown in the photographs, RBC refuse vehicles) to cross the site and in doing so traverse in front of the main building pedestrian area. Our observations:

- An unsatisfactory building design and/or inappropriate site design;
- Significant risks to pedestrians and wheelchair users which have little or no protected space;
- A site entrance which is inappropriate to the nature of the business which it is assumed the Applicant will hope to grow;
- We question whether on-site vehicle flows, routing and turning spaces have been addressed for all categories of vehicle (only an ambulance turning footprint is shown);
- Nuisance to local residents and traffic that have to contend with the daily rigmarole of HGVs trying to navigate the Conservation Area which radically compromises the idyllic tranquillity and safety in the centre of the Conservation Area;
- An unsatisfactory location of the staff carpark in close proximity to an adjacent private property.

We acknowledge that the Applicant wishes to widen the site entrance although the details of how this will improve site traffic management is not provided. If this is approved it will 'open up' visually the site as viewed from Main Street and will be contrary to statements within the Conservation Area Appraisal and the Village Design Statement.

In essence the Applicant is attempting to develop a business on a site in a constrained protected area in a village without an appropriate highway infrastructure. This is not acceptable for the reasons presented in this report.

Community Engagement

The Applicant has not engaged with the Parish Council or residents during the development of this Application. This is clearly contrary to RBC guidance including its Statement of Community Involvement (2019).

Since publication of R21/0152, TPC has proactively obtained residents' opinions; approximately 50% of households responded, of those 91% opposed the proposal. Whilst TPC has to ensure compliance with GDPR requirements, these records are available for scrutiny. Whilst residents' views might not be considered a Material Consideration at this stage, it has motivated the Parish Council to work together to respond robustly to this planning proposal and protect the village which is loved and

⁵ Drawing 3703-105

respected by so many.

Supplementary Observations

Whilst our observations and conclusions have been made on R21/0152 alone, TPC makes caveats about the robustness of our report because of several shortcomings within the Applicant's submissions:

- We question the accuracy, assumptions, completeness and reliability of the information being proffered. We identify inaccuracies in this report; these are not considered comprehensive assessments, indeed when the Parish Council requested access to the Applicant's site this was rejected.
- Two individual planning applications are under consideration by RBC (R20/1030 & R21/0152) which share a common site within the centre of Thurlaston village. For the purposes of assessing R21/0152 application it should be capable of being considered independent from the other application (and visa-versa). This is not necessarily the case, there are codependencies between the respective submissions. For example the proposed site layout is not congruent with R20/1030 which in part shares common space; site road designs cannot both be as submitted in the two applications. One submission must be in error, or perhaps both are inaccurate. We make observations solely about R21/0152 site design layout under the 'Highways Assessment' in this document.
- The landscape judgements submitted under R21/0152 will be factually incorrect if R20/1030 proposals are progressed.

Planning Conditions

Whilst TPC has raised fundamental objections to this proposal, should RBC be minded to support this proposal, on a without prejudice to TPC's objection, TPC requests the following planning consent conditions:

1. Proper assessment of sufficiency requirements and provision for on-site parking, to avoid an overflow of visitors parking on Main Street, where there are already regular parking problems.
2. Proper assessment of on-site vehicle and traffic management to ensure proposals are safe and visually acceptable from Main Street. Particular consideration must be given to the impact of HGVs.
3. Relocation of staff car parking away from a neighbouring residential location.
4. Strict controls to ensure building designs and building materials are in keeping with the surrounding village and the principles within the Thurlaston Village Design Statement.

Conclusion

The Applicant proposes a significant expansion to the estate of the extant Care Home which lies in the Thurlaston Conservation Area.

Planning approval should be denied, because of the reasons presented in this report and in particular, its contravention/incompatibility with Section 72 Planning (Listed Building & Conservation Areas) Act 1990, and NPPF (para.193-194).

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

Yours sincerely,

Parish Clerk
Thurlaston Parish Council

cc PLANNING APPLICATION APPRAISAL: 'A desktop critique of the planning application and reports for the proposed development at Thurlaston Meadows Care Home and Patricksfield'.
by Adam Owen MSc, AA Tech Cert, iarbor.

PLANNING APPLICATION APPRAISAL: Landscape and Visual Appraisal for Thurlaston Parish Council prepared by the Landscape Partnership, 11th February 2021.

PLANNING APPLICATION APPRAISAL: Landscape and Visual Appraisal for Thurlaston Parish Council prepared by the Landscape Partnership, Appendix 01: Figures & Photographs.