



Thurlaston Parish Council
Thurlaston
Rugby

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7th October 2022

Karen McCulloch (By email to karen.mcculloch@rugby.gov.uk)
Development Team
Rugby Borough Council
Town Hall
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Dear Karen,

Re: Planning Application R22/0853
Outline Planning application:
Land North Of Station Farm Cottage, London Road, Dunchurch
Development of up to 350 dwellings

This document is Thurlaston Parish Council's (TPC) representations regarding planning application R22/0853.

Our submission is considered under the following headings:

- **Transport and Highways**
- **Open space**
- **Air Quality**
- **Public Paths and Rights of Way**

Transport and Highways

In the locale there are several new developments which will coexist. It is important to consider the cumulative impact of the schemes, which comprise:

- (a) R22/0853 Cawston Farm Phase 2 housing development.
- (b) R16/2569 warehouse scheme (and various detailed submissions in support of the outline planning permission);
- (c) R18/0995 Cawston Farm Phase 1 housing development;
- (d) Fire Station adjacent to the R16/2569 warehouses;
- (e) The Warwickshire County Council (WCC) Minerals Plan 2018 to be situated along the A4071 (Straight Mile);
- (f) Housing developments along B4429 (Coventry Road), such as Thurlaston Gardens and Homes England.

Whilst all the schemes have not received full planning approval, the proposals are documented in the adopted South West SPD Rugby Local Plan and WCC's Minerals 2018 Plan. It would therefore be

negligent for the planning authority not to consider the cumulative effect on the proposed highways infrastructure. We note that National Highways in its letter of 21st September 2022 is also seeking to understand the holistic impact of the proposals which cannot be assessed until implementation phasing is defined. Fundamentally, it requires information concerning the South West Link Road (SWLR) and when this will be implemented and the Paramics model used.

Paragraph 2.2.21 of the applicant's Transport Assessment states:

“The Stage 4 testing identified that the delivery of a link between the A45/ M45 junction and the A4071 is essential to deliver relief to both Dunchurch Crossroads and the Rugby Gyrotory and is therefore considered a ‘high priority’. Option 3, shown in Figure 2.1, was found to be the best performing SWLR option in terms of the impact on Dunchurch.”

Instead of a northern link to the A4071, the application now proposes that “The development will be served by two vehicular accesses from the SWLR which runs along the east of the site, connecting Symmetry Park in the south and the B4642 Coventry Road in the north via the Cawston Farm Phase I site” (paragraph 4.2.1). Paragraphs 6.5.5 and 6.5.6 go on to state:

“6.5.5 As part of the adopted Local Plan and the South West Link Road proposals, the A4071 /B4642 Coventry Road Roundabout will be upgraded as part of the Potsford Dam Link to a four arm roundabout, shown indicatively in drawing number 332210774-114-002.

6.5.6 This layout has been designed and modelled for information only and shows how the Potsford Dam Link could connect to the existing roundabout in accordance with the defined route in the Local Plan and South West Rugby SPD.”

It appears that the application does not propose a link to the A4071, either as identified in the 2017 Rugby STA or as shown in the Local Plan or the South West Rugby Masterplan SPD 2021 (at Figure 2). No justification has been given for this change to the northern link of the SWLR, which will not provide the same relief to Dunchurch.

The Transport Assessment is based in part on the 2017 Rugby STA, which in turn relies on traffic count data from 2014 – 2016 (see, e.g., paras 2.7 and 2.9 of the STA). These data are between 6 and 8 years old and are not up to date.

The 2019 submission version of the WCC draft Minerals Plan included the allocation (Site 1 within Policy S0) of a 29 hectare sand and gravel site at Bourton on Dunsmore, which is approximately 400m to the west of Symmetry Park. The site is currently in agricultural use. The site has the potential to release 1.15 million tonnes of sand and gravel during the plan period to serve the markets of Rugby and Coventry. It appears that the HGV traffic likely to be generated by this site has not been taken into account in the transport modelling undertaken by the applicant, which given the scale of the site is likely to be significant. The Minerals Plan was adopted by WCC in July this year and the Bourton on Dunsmore site remains an allocated site (see Policy S1).

Transport Assessment table 6.14 states:

6.5.14 The results show that the southbound approach over the bridge is expected to be significantly over capacity in the 2031 Reference and 2031 Local Plan scenarios and this will be made slightly worse by the proposed development. The results of Scenario 5 (which includes the South West Link Road connecting from Symmetry Park to the B4642 Coventry Road) have also been shown in Table 6.14. This shows the Blue Boar North junction operates significantly better with the South West Link Road in place.

There is potential for an average delay per arriving vehicle of 5759.49 seconds, which equates to 96 minutes, however the impact seems to have been agreed as part of the Infrastructure Delivery Plan, so there are no mitigation measures planned now (6.5.15). It would be negligent to ignore this forecast; mitigation measures are needed which will likely require the enhancements to the A4071, inter alia this should include benefits to incorporating the SWLR into the A4071 intersection. There is a strong case to establish a strategic plan now; it will need to undertake assessments of the six schemes referenced in this report. Other additional benefits will accrue and support the provisions of Local Plan Policies DS8 and DS9 (Ref: Open Space in this report).

There are other significant development schemes in the locality, including by Homes England. No evidence is provided to indicate whether the Transport Assessment has taken account of these developments in a holistic modelling of south west Rugby highways.

In conclusion we have defined a number of important and critical elements of transport and highways infrastructure which require urgent attention. Presented evidence demonstrates plans are not sustainable and/or conflict with the requirements of the RBC Local Plan and WCC Minerals Plan. Until such matters are satisfactorily resolved development proposals should be halted.

Open space

RBC recognises the importance of making adequate provision for vehicle access and parking on new housing developments. By example, we refer to RBC's Cabinet meeting of 7th June 2021 and a transcript of Cllr Mrs O'Rourke statement: *"looking at learning from the past like Long Lawford Pavilions where things had gone very badly in terms of access to roads and cars parked on pavements"*.

The South West Rugby Masterplan SPD 2021 sets out in Table 1 the requisite open space provision by type, assuming 2.4 people per dwelling. The application scheme is for up to 350 dwellings, equating to 840 people for the purpose of assessing open space provision. The application Planning Statement sets out at para 6.20 the proposed onsite open space provision (not including sports facilities) of 4.3 ha against a total requirement of 4.998 ha. The greatest deficiencies are in allotments (none is proposed on the site) and amenity green spaces.

Paragraph 10.4 of the SPD states:

"Open space and sports facilities will be negotiated on a site by site basis unless a comprehensive site-wide approach is agreed between landowners and the Council which results in better quality and more accessible open space and sport facility provision on the site whilst adhering to the overall need to comply with policy in consultation with the Rugby Borough Council's Parks department."

As far as we can ascertain, a site-wide approach has not been adopted and it is therefore for the application site to provide a policy-compliant level of open space. The application proposal does not do this. Furthermore, even if one takes account of the open space provision at Cawston Farm (Phase I) and ignores accessibility issues, there would still be a deficiency in allotments. Given the duty on the Borough Council under section 23 of the Small Holdings and Allotments Act 1908 to provide allotments if there is a demand for them, it would be wrong to treat this matter as of no importance.

There is no need for this shortfall. A modest reduction in the number of dwellings proposed could free up enough land for open space provision which meets the Local Plan and SPD requirements.

Whilst the above metrics set statutory planning guidance, TPC wishes to know whether Tritax Symmetry has factored in their design the cumulative impact on parking due, in part, to the close proximity of their warehouse scheme. It is stated the proposed warehouse logistics service will provide employment for up to 2,400 people. The special local circumstances and the nature of logistics services will introduce changes in employment behaviour. Employees may be encouraged to keep business vehicles, such as Light Delivery Vehicles, in their care 24 hours per day. It is not in anybody's interest to see new housing developments cluttered with parked vehicles, especially a plethora of employee LDVs parked on housing schemes. Poor design examples, such as at Long Lawford, must be avoided. No mitigation measures have been proposed.

Air Quality

The site and its surroundings are in a declared air quality management area due to the exceedances of the annual mean nitrogen dioxide (NO₂) objective, mainly from traffic related impacts (see figure 9.3 in Appendix D.5 to the Environmental Statement; paragraph 23.1 of the South West Rugby Masterplan SPD 2021). Local Plan Policy HS5 and section 23 of the SPD require that new development must either meet air quality neutral standards (emissions from the development proposal being no worse, if not better, than those associated with the previous use) or address the impacts of poor air quality due to traffic on building occupiers and public realm or amenity space users by reducing exposure to and mitigating their effects, proportionate to the scale of the development.

The air quality assessment carried out by the applicant is said to show that:

“6.3.4 The operational phase of the Proposed Development will lead to changes in traffic flows across the local road network. Pollutant emissions from operational traffic generated from the Proposed Development has been demonstrated to cause negligible changes in local air quality and will not lead to any exceedances of the NAQOs, Limit Values or WHO guidelines. Therefore, effects are not significant.

6.3.5 The effects of existing sources of pollution in the local area upon air quality for future residents of the Proposed Development have also been considered. Concentrations of NO₂, PM10 and PM2.5 have been predicted within the Proposed Development. All predicted concentrations are well below the NAQOs and Limit Value” (taken from the Environmental Statement Non-Technical Summary).

We have two concerns. First, for the reasons given above the Parish Council is not satisfied that the traffic modelling is sufficiently up to date and robust. Secondly, and fundamentally, the applicant has ignored the policy requirement that the proposals (a) be air quality neutral or (b) mitigate the air

quality effects of the development. The traffic generated by a scheme of up to 350 dwellings (as compared with its current agricultural condition) will inevitably have a detrimental effect on air quality in the area but the applicant assumes that because the relative effect will be (in its view) “negligible”, it can be ignored. If every scheme of development took this approach there could be a significant cumulative effect on air quality in the AQMA without any attempt to address the causes of this. This is not what Local Plan policy requires and is a serious failing in the application. This stance endorses our opening section to this document where consideration is required of the cumulative effect of all six developments listed as (a) to (f). These developments require cumulative consideration compared with their current agricultural condition. Without assurances RBC could fail to improve the wellbeing of residents as required by both the SPD and its Corporate Strategy 2021-2024¹.

Public Paths and Rights of Way

Cawston Greenway

We support the linking of the Cawston Greenway to the R22/0852 land allocation (Ref: EIA Scoping Report paragraph 7.2.5). We note the applicant indicates three access points to the Greenway (Appendix A2 Parameters Plan 04/08/22) on the west side of the housing estate. From submitted drawings it is difficult to assess fully the different elevations of the Greenway in relation to street levels. The land allocation has a low area at the northern end and shown as being used for water catchment. Two points require consideration:

- Privacy – overlooking of private dwellings, as seen from the Greenway or its access route(s). There is a requirement to ensure property holders will not have their privacy compromised.
- Possible reduction in the number of Greenway access points by the provision of a zig-zag path from street level to Greenway level. Whilst the proposed pathway is for pedestrian use only, having a continuous path (i.e. without steps) would make access more user friendly for people who may have prams or cycles to push onto and along the Greenway.

Potsford Dam Link

A second important consideration is the linking of Potsford Dam / Greenway routes to the National Cycle Network (NCN) Route 41. This will promote both walking and cycling and clearly supports RBC Local Plan Policy DS8, as detailed in Section 19 of the South West Masterplan SPD. We refer again to Transport Assessment section 6.5.5 drawing number 332210774-114-002 – which shows an indicative assessment for the development of the A4071/B4642 roundabout. The proposal has the opportunity to link both Cawston Greenway and NCN Route 41 – with the aspiration of eventually surfacing the old railway route to Draycote village. This will also have the potential to provide a pedestrian route to the southern side of the A45 and access to amenities such as the Dobbies Shopping complex and McDonalds Restaurant. The proposal will require local planning authorities to be proactive, and potentially employ CIL/S106 contributions to facilitate scoping and detailed engineering design. Whilst the South West Masterplan SPD Appendix K provides indicative S106 infrastructure costs these are inadequate to determine the scope of individual projects such as the SWLR.

Collaboration with Dunchurch Parish Council confirms that it too is supportive of these proposals.

¹ Under the Care Act 2014 there is a general duty of a local authority is to promote individuals’ well-being. The RBC Corporate Strategy 2021-2024 states under Outcome 3 it will *Support residents to lead active lives, with high quality, accessible green space and recreational facilities.*

Summary

This submission has identified inadequacies in design proposals which require resolution. Whilst the application fails on its own merit, there is also a need to assess R22/0853 in the context of other south west Rugby developments – most notably RBC’s SW Rugby Masterplan and WCC’s Minerals Plan.

We have identified areas where information is incomplete to support proposals, and/or there are conflicts with the requirements of Local Policies. These include:

- Transport & Highways**
- (a) There is a requirement to demonstrate and provide evidence regarding the cumulative impact of multiple developments within the locale.
 - (b) There are compelling reasons to develop and commit to highways improvements, most notably with respect to the A4071 and the SWLR.
 - (c) No travel plans have been submitted to show net changes in vehicle movements, volumes, and whether they will be safe. The implementation of Rugby’s strategic traffic and travel plan is not developed, there are no valid data which assess the cumulative effects on local traffic, and how localities will be kept safe (e.g. HGV movement constraints) given the expected mix of HGVs, LGVs, public service vehicles, private motor vehicles.
- Open Space**
- (d) The Rugby Planning Committee has previously recorded that inadequate parking and access to housing schemes has not been acceptable. No metrics have been proposed to mitigate issues associated with the special nature of Tritax Symmetry’s Cawston 2 and Cawston 1 housing developments. This is not acceptable.
 - (e) There is a shortfall in open space provision; the requirements of the section 23 of Small Holdings and Allotments Act 1908 have been ignored.
- Air Quality**
- (f) TPC is not satisfied that the traffic modelling is sufficiently up to date and robust.
The applicant has ignored the policy requirement that the proposals (a) be air quality neutral or (b) mitigate the air quality effects of the development.
These developments require cumulative consideration compared with their current agricultural condition.
The cumulative pollution impact of six close proximity schemes has been ignored. This is a fundamental omission especially as all development sites are currently agricultural land. Evidence is required to show what assessments have been made based on valid current traffic counts and the metrics employed for their extrapolation for the inclusion of all south west Rugby developments.
- Public Paths and Rights of Way**
- (g) We make proposals to improve the Cawston Greenway and NCN Route 41. There are opportunities to link these travel ways to the SWLR (Potsford Dam Link). These proposals align perfectly with Rugby’s Local Plan policies and its Corporate Strategy.

Whilst the South West Masterplan SPD Appendix K provides indicative S106 infrastructure costs these are inadequate to determine the scope of individual projects such as the SWLR.

Planning approval should be denied for the reasons presented in this report.

Yours sincerely,

Dr Keith Boardman
Chairman Planning Subcommittee
Thurlaston Parish Council