

Rugby Borough Council Local Plan Stage 2 Hearings

Precursor

The Inspector has made the decision to proceed with Stage 2 hearings although he still has to make decisions on the Stage 1 process.

We understand this because we also were disappointed with the performance of the Rugby Borough Council representatives in many areas.

It was alarming to witness high level barristers representing developers having to effectively attempt to make the case to support the RBC LP proposals.

Because the inspector requires further time to deliberate we feel justified in making some observations on the process to date prior to addressing a number of the MIQ's tabled for the upcoming hearings.

We are not going to restate the detail of concerns for our local and wider community because that, we believe, has been covered in documents we submitted during consultation and preparations for Stage 1. Strong arguments have been tabled that challenge the RBC analysis regarding the quantity and mix of housing required and the type and quantity of industrial premises. Traffic flows and emissions of all types were highlighted but we believe the RBC supportive arguments for its proposals were ill conceived.

These challenges have been made with in depth assessment of data contained in the Local Plan.

Thurlaston Parish has, at all times taken a broad view of the Local Plan.

We want an ambitious plan for our Borough to continue the achievements and historic innovation which has taken place here.

The process over the last eighteen months or so has been disappointing. We have made our observations with the guidance from experts with many years experience in modelling, validation and verification techniques. We offered our help but unfortunately our view is that we have been stonewalled. Not once have we heard any acceptance that the points we make have been listened to. Never has the RBC expressed an acknowledgement that we might be talking sense and our input has to be listened to.

RBC has treated residents as opposition not people with a lifetimes experience in a variety of skills who are there to help the process

The RBC has presented a plan driven by an inappropriate system which is initiated by an enquiry to land owners which effectively asks the question. "Are there any farmers out there who are fed up with farming who are keen to benefit financially from an urban development programme?"

RBC got their responses to the question and are now trying to persuade the constituents that its plan is sound even though the land offered is not in the right place for a more efficient borough operation or suitable for the wider integration into the national networks.

We therefore end up with a plan which is unsound.

It presents a proposal full of risks which have no mitigation solutions.

In the case of the warehouse proposals in the south west we believe the risks could never be mitigated due to the impact of emissions on the health of our community.

The RBC document "Statement of Community Involvement Review" does not include Daventry and Harborough districts as organisations who have been consulted as part of the "duty to cooperate" requirement. These areas are major providers of

warehouse facilities and provider of employment. RBC has not provided this holistic view of warehousing on our doorstep. Warehousing will not produce economic growth or jobs for our citizens

Finally to try and summarise the issues the LP appears to create with specific reference to Thurlaston Parish.

- It is not a solution that the customer (residents) wants.
- Valuable agricultural land will be destroyed.
- Traffic chaos will ensue for new and existing residents who will now have a cauldron of emissions at the centre of a residential area.
- This will be a 24 hour operation and noise and light pollution will be equally concerning.
- B8 warehousing will not bring economic growth to our area.
- RBC is failing to grasp opportunities for higher tech industries and growth areas.
- The warehouse project will be unsustainable. db symmetry have no idea who the residents will be or how long they may stay in business.
- On a smaller scale Dunchurch trading estate is a ghost premises.
- Occupants will soon realise that the site is ill suited to connections other than south on the M45 despite db symmetry claims in its planning application.
- Meanwhile we will see lorries still accessing the M40 south by using the Dunchurch crossroads and the Southam Road.
- Some will use the A45 and A46 but I am sure this will recreate the Toll Bar problems which we thought we had solved.
- Trucks will use the western relief road to access M6 north and the M1 but remember it runs straight past one of our major secondary schools and the traffic chaos which is the Leicester Road.
- Ashlawn Road will get used by trucks trying to get to the M1 north and the M6. Again straight past another major school.

I see no risk assessment or mitigation activities for any of this.

Matter 7 Issue 7(b) Employment Policies ED2 to ED4

These policies cover the provision of employment land within the urban area .outside the urban area and more rural development.

The documents list numerous existing sites and appended to the list are the new proposals in the south west and at Coton.

Two issues occur to me.

I listened to a man at the Stage 1 hearings who was actively trying to market 2million square feet of employment land at the old Rolls-Royce site at Ansty. This site is on the RBC list but doesn't seem to be utilised. 2million square feet is very similar to the proposed area for the south west. I don't understand the reluctance to use this as it is in an ideal position for all major networks and has already been used for industrial purposes.

The policies make no reference to the "duty of cooperation" with neighbouring planning authorities. Daventry and Harborough seem to have been omitted from the RBC discussions. There are planned B8 projects in these areas. The discussions need to take place to understand whether those districts can work with us to provide

the perceived employment benefits to Rugby citizens. We need the wider view of warehousing plans for all neighbouring districts.

Matter 10 Issue 10(d) Traffic Policy HS5 - Traffic Generation and Air Quality.

Any development that results in significant negative impacts on health and wellbeing of people in the area as a result of pollution, noise or vibration caused by traffic generation will not be permitted unless effective mitigation can be achieved.

We, as a Parish community are not in any position to commission independent analysis of the effects on lives of parishioners but even from a subjective analysis it is clear that the proposals for warehousing in the south west will fail the HS5 test because there is bound to be significant negative impacts on health and wellbeing of residents. The proposed logistics operation must by definition dramatically damage air quality. We assume that to demonstrate any mitigation to conform to the requirements of the Air Quality Supplementary Planning Document (AQSPD) then extensive modelling will be necessary.

The quality of models and the data that is input to these models has been a major concern to us. At the Stage 1 hearings the RBC was challenged on these issues and we didn't get satisfactory answers. The standard of models was questioned; the type and frequency of journeys was challenged and the RBC could not demonstrate a rigorous process of verification and validation.

I personally spent a career involved with the system modelling of gas turbines and peripheral systems and it was always very clear that the quality of the output was a direct function of the quality of models and input data. The sensitivity of the output to, what may appear to be trivial variations in inputs can be quite severe.

Any work carried out which attempts to mitigate the risks associated with the creation of a logistics park must be carried out and made available to the public prior to any approval for planning permission.

Matter 11 Issue 11(c) Policy NE4 - Landscape Protection and Enhancement.

New development which positively contributes to landscape character will be permitted.

The proposals for the warehouse development in the south west totally contradict Policy NE4.

Visitors to our Borough arriving via the M45 and A45 will drive along the Coventry Road towards Dunchurch and immediately to the left is farmland with walkways to Cawston and Northampton Lane. These have been routes which our birdwatching group have taken to witness the wildlife. Larks are frequent spots as are gold crests and the floral contribution to the vista is stunning at certain times. The Coventry Road continues past the village of Thurlaston and its conservation area and on to Dunchurch bounded by fir and larch and it has been recorded by the Britain in Bloom team as probably the most picturesque entry to our town.

Now the proposal is to replace this with a logistics park. It intrigues me how as a nation we have been brainwashed into believing that a logistics park means glorified sheds. There is no effort by the designers (I can't call them architects) to create structures which may be pleasing on the eye and with some innovation and modification could have a further use when they have served their useful lives as warehouses. The designer of the buildings knows they are an eyesore and the planning application talks poetically about fragmenting the image with suitable planting of varying height. What they mean is that they know the buildings are ugly

and they are desperate to hide them. I can guarantee that these monsters will have a finite life. Distribution and logistics techniques which have been driven by the on-line shopping boom will change. It's scary what is being developed by organisations like Amazon. Warehouses will be completely controlled by robots. Two of the Amazon facilities in this country are like that now. Also, Amazon will deliver your parcel by drone if the package weighs less than 5kg and you live within ten miles of a customer facility. Please don't laugh at this. Amazon is spending real money at several research centres in the world. It will happen.

Therefore, one of our most respected landscapes is being replaced by sheds. I think the proposal fails the NE4 test.

The farmers who are tired of tending the land and are selling to developers clearly have not heard that farming is changing. There has been evolution and revolution in the fields of Britain. An agricultural revolution with the introduction of new productivity enhancing technologies and a food evolution with a relentless drive for high standards has begun. The mission statement for the NFU is to make Britain the food producer of choice for every British citizen. Post Brexit Britain will not turn its back on 450million EU customers but it must open up new markets and we must be proud of food production in this country and it should be the envy of the world. We have to become less reliant on imports and technology will be the driver for this. We can't let a planning department destroy these opportunities. Be aware of the implications that this Local Plan has on other industries and our economic future. How can our farmers be the best in the world if you take our fields now. Once we build on them they are gone forever.

Matter 12 Issue 12(c) Policy SDC3 - Protecting and enhancing the historic environment
Development which sustains and enhances the Borough's heritage assets will be supported

The proposed logistics park lies a few hundred metres from the village of Thurlaston. The village is historic, it's mentioned in the Domesday Book. It has a Conservation Area at its heart with thatched cottages dating back to the 15th or 16th century. Most of the buildings probably date back to the 18th century. Great effort is made to preserve and protect this area and there are of course strict rules for any planned alterations to properties and trees. RBC itself authored the document to appraise this area and give guidance on how maintenance and improvements should be carried out.

The conservation area should not be treated in isolation. The value of the conservation area for historic reasons and for the pleasure of residents and visitors is in the approaches to the area also. We are not a museum where the historic area is entered through a turnstile, we are a community. I am concerned that the travel directions to our village will read "turn immediately right after you pass the warehouses and you will enter the peaceful village of Thurlaston with its conservation area and opportunities to walk through some lovely Warwickshire countryside overlooking Draycote water".

The proposals in the Local Plan make nonsense of all our efforts to preserve this historic settlement.

We have a failure therefore regarding policy SDC3. The proposals must be refused as it clearly fails to enhance the Borough's heritage assets.

Norman Lines for Thurlaston Parish Council 15th March 2018