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Stand Against Lodge Farm Village (SALFV)

**Land at Lodge Farm
Warwickshire**

**TRANSPORT APPRAISAL
(Technical Note TN3)**

**Report on Proposed Allocation
of Land at Lodge Farm by
Rugby Borough Council**

October 2017

Proposed Allocation of Land at Lodge Farm by Rugby Borough Council

Transport Appraisal (Technical Note TN3) - Executive Summary

This Technical Note (TN3) has been prepared by *Lawrence Walker Limited* in response to a request by the *Stand Against Lodge Farm Village* (SALFV) group to examine the traffic implications of a proposed housing allocation by *Rugby Borough Council* at Lodge Farm in Warwickshire. In support of the allocation RBC commissioned VECTOS to undertake a *Strategic Transport Assessment* (STA) and this TN3 effectively provides a critique of the June 2017 version of that assessment including the *South West Link Road* (SWLR), together with an overview of other transport issues.

The report concludes that:-

- i) The traffic model developed by VECTOS does not properly include Lodge Farm and does not consider impacts at Daventry and along the A45 through to the M1 to the south as a result, where traffic is already known to cause issues. The model is not therefore fit for purpose as it currently stands;
- ii) The Dunchurch Crossroads represents a serious impediment to development to the south of Rugby and this is fully recognised by VECTOS. Their recommendation *"to promote options which limit the amount of additional traffic which is likely to travel through the Crossroads as the Local Plan is brought forward"* has however not been followed by RBC, who instead seeks to promote the delivery of Lodge Farm;
- iii) In order to support Lodge Farm, a localised improvement is required at the Dunchurch Crossroads. This improvement has neither been properly identified nor its impacts on the existing Listed Buildings, Statues and Monuments assessed. Such an interim solution is fundamentally not deliverable in locally-based LWL's view (because of the existing constraints);
- iv) WCC's record in delivering large-scale infrastructure to support development is very poor. As a result, any claims made within the Draft Local Plan with regards to the delivery of the SWLR must be regarded with a high level of caution;
- v) Notwithstanding the unlikelihood of WCC delivering either the localised improvement at the Dunchurch Crossroads or the SWLR, the two schemes combined would still fail to properly mitigate Lodge Farm. At all stages of the development the traffic and Air Quality through Dunchurch would instead be markedly worse than today (2016), which is not an acceptable proposition and contravenes Para's 30 & 32 of the NPPF;
- vi) The site cannot adequately be served by Public Transport. As such its allocation would not meet the requirements of Para's 34 & 17 of the NPPF; the latter requiring LPA's to *"make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable"*;
- vii) The A45 between Dunchurch and the M1 is of very real concern in terms of road safety and with 41 accidents over a 3 mile stretch in the past 5 years, is clearly not a suitable place to locate a new residential development. Nowhere in either the VECTOS STA or in any of the documentation provided by RBC in support of their Draft Local Plan has any consideration of road safety along the A45 been provided.

Based on the above, it is LWL's opinion that the allocation of Lodge Farm is unsound and it should be removed from the Local Plan.

Land at Lodge Farm - Warwickshire

Technical Note 3

Report on Proposed Allocation of Land at Lodge Farm by Rugby Borough Council

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LAND AT LODGE FARM - WARWICKSHIRE

Technical Note 3

Report on Proposed Allocation of Land at Lodge Farm by Rugby Borough Council

1.0 [Introduction](#)

General

- 1.01 This Technical Note (TN3) has been prepared by *Lawrence Walker Limited (LWL)* in response to a request by the *Stand Against Lodge Farm Village (SALFV)* group to examine the traffic implications of a proposed housing allocation by *Rugby Borough Council (RBC)* at Lodge Farm in Warwickshire. The proposed allocation would see 1,500 units constructed across the site as shown at **Appendix A**, with 665 being provided within the Plan Period.
- 1.02 In support of the allocation RBC commissioned VECTOS to undertake a *Strategic Transport Assessment (STA)* and this TN3 effectively provides a critique of the June 2017 version of that assessment, together with an overview of other transport issues. In so doing it should be noted that LWL is based at Leamington Hastings in Warwickshire, which is less than 5 miles from the Lodge Farm site and just 4 miles from the A426/B4429 (formally A45) Dunchurch Crossroads; a notorious local bottleneck through which much of the traffic produced by Lodge Farm would need to pass. This, together with 25 years of experience in major projects in Coventry, Daventry and Rugby gives LWL a unique insight into the challenges presented by the proposed Lodge Farm allocation.

Scope of Report

- 1.03 The report provides a critique of four aspects of the Lodge Farm development, being:-
- i) Whether the *Strategic Traffic Model (STM)* used by VECTOS is fit for purpose;
 - ii) Whether the ultimate package of mitigation measures proposed for the Lodge Farm development is sufficient to allow the scheme to be brought forward and if it is, whether the site could progress in the short term without the *South West Link Road* having been completed first on the back of interim improvements to the Dunchurch Crossroads;
 - iii) Whether Public Transport services can be delivered to the site on a commercially viable basis to comply with the requirements of the NPPF in terms of sustainable transport, and;
 - iv) Whether the current extreme safety issues along the A45 close to Lodge Farm have been properly considered by RBC in the assessment process.
- 1.04 Each aspect is now assessed in turn to determine whether, in LWL's view, the allocation as proposed can be regarded as sound.
- 1.05 By way of reference, it should be noted that use of the term SWLR within this TN3 refers to the *South West Link Road*.

2.0 Traffic Modelling

Key Limitations

2.01 There are two fundamental issues associated with the STM that make it un-fit for assessing development at Lodge Farm at this time. These are:-

- i) The model area does not properly cover the impacts of Lodge Farm, and;
- ii) The trip-end data used to support the trip distribution is not substantiated.

The Model Area

2.02 Fundamentally, the Lodge Farm allocation post-dates nearly all of the modelling work undertaken by VECTOS and the site was only added by RBC as an after-thought late in the day. This means that VECTOS has not properly assessed the site and the extent of the model at Figure 1 does not include any of the areas to the south of the site. This means that impacts along the A45 towards Daventry have not been assessed, which is the direction all traffic would need to travel to reach Daventry, Leamington Spa, Northampton and the M1. The impact of a significant proportion of the traffic likely to be produced by Lodge Farm has therefore simply not been considered. It is however of great interest to current users of the A45, which has a very poor safety record as is discussed later at **Section 5** of this TN3. It is difficult to see how any Local Plan can be regarded as sound when the assessment of impacts from one of its major allocations stops at an arbitrary administration boundary half-way along a major road.

2.03 Whilst such an approach might well yield satisfactory results towards the north of the model, it cannot be expected to identify impacts in Daventry to the south, which is not even in Warwickshire. There is scant regard given to the Daventry area by VECTOS as a result and it would appear doubtful, given the timescales involved, that Northamptonshire County Council has been consulted on the Lodge Farm proposal at all. This is a major shortcoming, as the quickest route from Lodge Farm to the M1(S) and thence Northampton is via the A45.

2.04 Irrespective of County administrative boundaries, the STM should have been properly extended and re-calibrated to include Daventry and routes to the M1 in particular in its core area, as significant re-distribution around the town is bound to occur if additional traffic is placed on the A45. The site has simply not been properly assessed in LWL's view and as a result the STM used is not fit for purpose as it currently stands.

Trip-End Data

2.05 In terms of traffic distribution, it is stated by VECTOS at Para 3.23 that:-

The one exception to this is the Lodge Farm site, which lies within an MSOA boundary for which the current journey to work data is based on a large MSO covering multiple dispersed residential areas. It was considered that a distribution derived from this MSOA would not represent the likely travel patterns of a sizeable residential site in this area, due to the rural nature of the MSOA. In this instance, through liaison with the site promoters, WCC was able to provide VM (VECTOS) with a site specific gravity model distribution pattern to be applied to the site for the testing.

2.06 It is not acceptable to adopt a distribution for a major site that is based on data supplied by the promoter without also offering that data up for proper scrutiny. This is a poor modelling decision in LWL's view and one that, it is assumed, was adopted due to the lack of time afforded to VECTOS by RBC within which to assess the site. It does not lead to credible results and cannot be shown to be either robust or conservative. As a result, any conclusions drawn from the STM with respect to Lodge Farm are significantly flawed and cannot be relied upon to support the site's allocation to any degree.

3.0 [The A426/B4429 Dunchurch Crossroads](#)

Overview

- 3.01 The signalised Dunchurch Crossroads is a bottleneck on the network throughout the day and notoriously so at peak times. It provides for only single lane approaches from the north and south with no space within the junction itself for right-turning vehicles to queue, whilst from the west queuing traffic in the inside lane extends for many hundreds of metres for long periods each day preventing access to the right-turn lane almost entirely. The layout is confined and surrounded by Listed Buildings, Statues and Monuments within an historic setting, leaving virtually no spare Highway Land on any of its four sides. A photographic record of the junction is proved at **Appendix B**.
- 3.02 In terms of operation, the presence of parked cars to the west and south significantly adds to its problems, as do poor visibility throughout and the numerous local businesses that take access directly from both roads close by, including The Dun Cow Public House. As a result, the average journey time through the junction in the evening peak is currently **25 minutes**, with the average length of queue from the south, north and west being commonly in excess of 500m and frequently in excess of 1km. There have been 6 accidents at the junction in the last five years.
- 3.03 Fundamentally, what must be noted when considering the Dunchurch Crossroads is that the situation **today** is unacceptable. Traffic congestion as measured in 2016 was severe and already resulted in a breach of statutory Air Quality (AQ) limits, placing the junction within an AQ Management Area. Providing mitigation for development traffic on a “Nil-Detriment” basis is not a valid approach in these circumstances, and even more so if the “Nil-Detriment” baseline is assumed to be what *might* occur by 2031 and not what *already* occurs now. This does however appear to be what VECTOS has done (as demonstrated below) and thus the whole approach to the assessment of Lodge Farm must be regarded as unsound. Proving that the various mitigation measures proposed leave congestion at the Crossroads in 2031 no worse than it would be without them and Lodge Farm is meaningless, and instead the requirement in 2031 must surely be to deliver a queue-free junction that complies with accepted AQ limits. This is a far cry from what VECTOS has actually sought, and largely failed, to demonstrate.

Siting of Development

- 3.04 Irrespective of any mitigation measures proposed, it is first worth examining what VECTOS’s advice to RBC has been historically regarding Lodge Farm, and indeed what it is today. To that end the Stage 3A analysis contained within the September 2016 version of the STA noted at Paras 7.38, 7.39 and 3.13 that:-

The Dunchurch Crossroads area represents one of the most constrained areas of the network. It is acknowledged that there is limited capacity in this area to provide additional improvements and there are also issues with Air Quality that make it highly undesirable (to allow) any traffic volume increase in this area.

At the moment Dunchurch Crossroads comes under a lot of pressure as the A426 is one of the main arterial routes into and out of Rugby. The current linkages between the B4642 and A426 are poor standard and unattractive to drivers, which makes avoiding the Cross-Roads very difficult....

The situation at the Crossroads is very similar to that which is observed at the Rugby Gyratory insofar as there are not likely to be any further, significant, measures identified for the junction that will improve the conditions both in terms of congestion and Air Quality. As with the Gyratory, it is therefore considered favourable to promote options which limit the amount of additional traffic which is likely to travel through the Crossroads as the Local Plan is brought forward.

- 3.05 Comparing the above with the current June 2017 version shows little has actually changed, with VECTOS again using the same wording at Paras 2.65 & 2.66:-

The Dunchurch Crossroads connects the A426 with the M45/A45 via the 84429 Daventry Road. The area is one which already suffers from heavy queuing and experiences issues with Air Quality.

The situation at the Crossroads is very similar to that which is observed at the Rugby Gyratory insofar as there are not likely to be any further, significant, measures identified for the junction that will improve the conditions both in terms of congestion and Air Quality. As with the Gyratory, it is therefore considered favourable to promote options which limit the amount of additional traffic which is likely to travel through the Crossroads as the Local Plan is brought forward.

- 3.06 Form the above it can clearly be seen that VECTOS is on no doubt as to the current status of the junction. They confirm LWL's observations that it is already heavily congested and that meaningful local improvements are not possible. They go much further however, stating that because of Air Quality concerns, **any** increase in traffic would be "highly undesirable" in their view.
- 3.07 In the context of Lodge Farm this is a damning narrative, since VECTOS also notes that it is very difficult for drivers to avoid the junction as it stands, if bound for numerous destinations; most of which would clearly be favoured by residents of Lodge Farm. In these circumstances it is difficult to see how allocating 1,500 new dwellings to the site can in any way be regarded as sound.

Extent of Mitigation Proposed

- 3.08 Establishing next the extent of the mitigation proposed, VECTOS discusses the need for more than just the SWLR in the context of mitigating Lodge Farm at Paras 5.15 & 5.42 of the Stage 1 2031 analysis, whilst Para 6.16 applies to 2021 but uses identical wording:-

Testing in Stage 1 revealed that the SWLR alone was not sufficient in providing network operation that didn't result in gridlocking, and, as a result, measures were identified and included within the modelling to create the final Do Something model scenario.

The analysis indicates that the level of housing that has been tested in Stage 1 is likely to generate traffic levels which lead to the network approaching capacity even once mitigation measures have been assigned. The analysis has resulted in a number of mitigation schemes being identified, the most critical of which is considered to be.... Dunchurch Crossroads (Scheme 3).

- 3.09 Thus it can be concluded that for Lodge Farm to progress, an interim scheme is needed in the short term, together with the SWLR in its entirety by the end of the Plan Period at 2031. It must also be noted that the SWLR is **not** sufficient by itself to mitigate the development at this point in time, and it instead requires help in the form of the interim improvement at the Dunchurch Crossroads to work.

Phasing and Effectiveness of Mitigation

- 3.10 As discussed above, it would appear from the VECTOS analysis that both the SWLR and an interim improvement to the Dunchurch Crossroads will be needed by 2031 to help mitigate Lodge Farm and LWL agrees with this assessment; albeit not that what is proposed actually works. The date at which the SWLR is needed is though a matter of debate, in that VECTOS seems to indicate that it should not be provided before 2021.

- 3.11 In this context, at Para 6.36 they note that:-

Due to the fact that, with the inclusion of the Local Plan demands in the model, the number of vehicles routing through the Dunchurch Crossroads is consistent with the 2021 Reference Case, and doesn't significantly change with the introduction of the scheme at this location, it is determined that by 2021, there is no explicit requirement for the South West Link Road to be delivered. As the 2021 Local Plan demands do not appear to worsen the performance of the junction compared to the 2021 Reference Case, the proposed (interim improvement) scheme will have sufficient capacity, in the short term, to cater for the level of development being proposed by 2021.

- 3.12 This is a perverse argument in LWL's view and lacks concern for the current AQ and congestion problems. What VECTOS is actually saying is that because the situation *with* Lodge Farm and a localised improvement will be no worse in 2021 than it would otherwise be, that's ok and there is no need to build the SWLR before then. The situation in terms of AQ was however not acceptable in 2016 and certainly will be no better by 2021, so it cannot possibly be a sound proposition to intentionally leave the village and its residents with a half-hour delay and an AQ breach for at least five years as part of a Local Plan. If relief is to be afforded at least in the short term, then it must always be a requirement that the SWLR is built first to make sure that statutory limits are met.

- 3.13 That said, of more concern is in fact the ultimate end result. Far from solving the problem through Dunchurch as the SWLR was originally intended to do, the addition of Lodge Farm means that even with it, AQ and congestion in 2031 will be no better than they are today. This is because as with the interim assessment, VECTOS has used the situation that will otherwise exist in 2031 as its baseline, which is neither a compliant nor acceptable position. Even by 2031 therefore, the good residents of Dunchurch will still be faced with heavy congestion and unacceptable levels of air pollution; only this time with no prospect of things ever improving since as far as they are concerned, all of the benefits of the SWLR that might have come their way will have been wasted on mitigating Lodge Farm.

- 3.14 To quantify the above, LWL has asked VECTOS to provide variants of Figure 20 (AM Peak) and Figure 21 (PM Peak) showing firstly the Local Plan against the 2016 Base Case position (i.e. *not* against the Reference Case) and secondly showing the same but with the allocation at Lodge Farm removed. The true impact of what is proposed can then be properly judged by the Inspector at the Local Plan EIP.

Deliverability

- 3.15 As noted above, simply to maintain the “Nil-Detriment” position throughout the Local Plan period it will be necessary for WCC to deliver both an acceptable interim improvement at the Dunchurch Crossroads and the entire SWLR. LWL would suggest that both are unlikely, given the severe constraints present at the location of the former and WCC’s poor track record at delivering major schemes in support of Local Plans with respect to the latter.
- 3.16 Turning to the Dunchurch Crossroads first, the scheme analysed by VECTOS is shown at Page 3 of Appendix B to the STA. This scheme has not been drawn up in any detail and can neither be accommodated nor would in any way be acceptable in environmental terms in LWL’s view. A separate report has been prepared covering the latter and its impacts on the historic setting of the Crossroads if allowed to progress.
- 3.17 It should also be noted that Land Ownership in the area remains unproven and it is particularly unclear as to how the radii shown in the North-West and South-East quadrants can be accommodated without first having to demolish parts of both The Dun Cow and Omar’s Restaurants (**Appendix B**). It is suggested that VECTOS has in fact not visited the site to view the constraints, since as locally based Transport Planners LWL does not believe that any interim worth-while improvement of the Dunchurch Crossroads is actually possible. In the absence of evidence to the contrary at this critical location, LWL has asked VECTOS to provide a detailed layout for consideration by the Inspector at the Local Plan EiP.
- 3.18 Looking then at the SWLR, LWL’s concern is that having been involved in the *Rugby Western Relief Road* from a development perspective as far back as 1995, WCC will not be able to deliver such a major scheme on time or within budget.
- 3.19 Originally estimated at £10.5m, the S106 for Swift Valley negotiated by LWL contributed £1.5m to the scheme in 1997. It was finally opened in September 2009 some 10 years late, and at a cost of over £60m. It is thus highly unlikely that the SWLR can be funded by development contribution and even if it could be, the time take to accrue such funding and then deliver the scheme would put it out-with the Local Plan period. In the meantime development at Lodge Farm would presumably continue to overload the Dunchurch Crossroads, even if an interim scheme were to be able to be put in place. This cannot be a sound basis on which to site a 1,500 unit housing allocation.

Summary

- 3.20 On the basis of the above appraisal, it is clear that the case against the allocation of Lodge Farm from a traffic perspective is a simple but compelling one. The following logic applies:-
- i) The existing traffic situation (2016) is already intolerable and results in a breach of statutory AQ limits. As a consequence, VECTOS considers that it would be *“highly undesirable for any traffic volume increase in this area”*; (*Ref Para 8.14*)
 - ii) In order to proceed in both the short and long term, Lodge Farm requires the SWLR to be delivered in various stages **AND** a local improvement to be provided at the Dunchurch Crossroads; (*Ref Para 5.42, Tables 38 & 39 and Table 17*)

- iii) WCC does not have a track record to guarantee that the SWLR will be delivered either on programme or within budget, so this must cast doubt as to the validity of relying upon it within the Local Plan to mitigate Lodge Farm in phases between 2021 and 2031; *(Ref WRR Scrutiny Report April 2011)*
- iv) The local improvement to the Dunchurch Crossroads identified by VECTOS will not fit within the existing Highway Boundary or between the existing Buildings and Monuments. *(Ref Para 6.16 and Page 3)*. It cannot therefore realistically be delivered nor again relied upon to mitigate Lodge Farm;
- v) Notwithstanding the unlikelihood of WCC delivering either the SWLR as required or providing a meaningful localised improvement at the Dunchurch Crossroads, the two schemes combined would still only provide a “Nil-Detriment” solution when measured against any of the 2021, 2026 or 2031 Reference Cases. *(Ref Para’s 6.36, 6.40, 10.14, 8.15, Figures 20 & 21 and Figures 56 & 57)*. **This means that at all stages of the evolution of Lodge Farm the traffic and AQ situation through Dunchurch must be markedly worse than it is today (2016);**
- vi) Since this position is already intolerable and breaches statutory AQ limits, a “Nil-Detriment” position is simply not a permissible yardstick by which to gauge the acceptability of the mitigation package at this critical location. The yardstick cannot even be today’s position (effectively the VECTOS 2016 Base Case) as that still breaches statutory AQ limits. The cumulative impact of the allocation is thus “Severe”, meaning that the development should be dismissed on traffic grounds in accordance with Para’s 30 & 32 of the NPPF;
- vii) Traffic (and hence AQ impacts) due to Lodge Farm results in a marked deterioration when measured against 2016 observed values and the VECTOS have been asked to confirm this by amending *Figures 20 & 21* to show the position against the 2016 Base Case (as opposed to the 2031 Reference Case) both with and without Lodge Farm. At this point it will inevitably be confirmed that Lodge Farm cannot be mitigated through Dunchurch and must be removed from the Local Plan.

4.0 Public Transport

General Position

- 4.01 Fundamentally, Lodge Farm is a remote location that holds no synergy with any other community within the Borough from a transport perspective. It is equidistant from Rugby and Daventry but near neither, and is the wrong side of the A45 from both. Employment opportunities are sparse in the locality, which means all residents would seek to travel to one or other of the two major towns by car. Simply accessing the site by cycle would be problematic across what is a busy and fast principle road, whilst there would be no opportunity for travel on foot at all, due simply to the distances involved.

Sustainability & Modal Split

- 4.02 No matter how it is presented, the site is poorly located from a sustainable transport perspective and this cannot be over-estimated (**Appendix A**). The A45 is an important principle road and construction of new access points onto it will serve only to conflict with existing traffic on the wide single carriageway, and yet the route currently supports no public transport at all.
- 4.03 To re-inforce this point, the A45 past Lodge Farm is now devoid of all bus services following their withdrawal on economic grounds in 2016. The standard of the existing bus stops bears testimony to their demise, with Route 9 (as shown on **Appendix D**) no longer in existence and its seeming replacement (Route 12) being routed through Braunston and Barby to Crick. It must also be remembered that the A45 sits to one side of the Lodge Farm allocation anyway, meaning that even a through service would be some way from the centre of the development (and well beyond the required 400m from most of it) and would require half of all passengers to cross the A45 simply to reach the southbound side.
- 4.04 Now it is possible that the promoters of Lodge Farm could suggest an improvement of the existing service or even a new dedicated provision serving just the development itself, but this, LWL would contend, would not be viable commercially.
- 4.05 To explore this premise, discussions with local operator Stagecoach suggest that if a standalone service were to be provided to connect the development with (say) Rugby on a 30 minute daytime frequency, it would cost upwards of £300,000 per annum. On this basis it would be highly unlikely to ever generate enough revenue to become commercially viable (given the size of the development and the limited availability of third-party patronage) making it difficult to see how the site could be served by even the most modest of public transport offers. The result would then be car usage levels commensurate with other rural communities in the area (where over 90% of all journeys are currently made by private car) putting the allocation in direct conflict with Para's 34 & 17 of the NPPF. The latter states that LPA's should instead:-

Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable...

- 4.06 Lodge Farm clearly does not comply with this requirement.

5.0 [Road Safety Considerations](#)

Base Position

- 5.01 The A45 past Lodge Farm is a notoriously unsafe old-fashioned wide single carriageway where there have been 41 accidents in the past 5 years over a 3 mile section spanning Lodge Farm (**Appendix E**). This is an alarming number for what is legally only a 50mph road and is known to be of serious concern to Northamptonshire County Council, within whose jurisdiction much of the three mile section lies.
- 5.02 Of even more concern is the number of clusters along the route, suggesting that the A45 has a large number of unsafe features and junctions that cannot easily be addressed and which would clearly be exacerbated by additional traffic from Lodge Farm. This is particularly true to the south of the site, which is the direction all traffic would need to travel to reach Daventry, Leamington Spa, Northampton and the M1. Even with the advent of the Flore Bypass, the existing situation is hardly conducive to the siting of a new housing development.

Implications for Lodge Farm

- 5.03 Looking more closely at **Appendix E**, a total of 6 accidents occurred at the Woolscott Road Crossroads very close to Lodge Farm, with the same number occurring at the Dunchurch Crossroads to the north and a staggering 15 at the Flore Hill Crossroads with the A5 to the south (**Appendix C**). There have also been 5 deaths on the A45 between Dunchurch and the M1, which is a very concerning number.
- 5.04 Overall, the A45 can demonstrably be seen as a very real concern in terms of road safety and it is clearly not a suitable place to locate a new residential development for that reason alone. It is difficult to see how cars could ever be expected to use this route safely given its current appalling safety record, let alone young cyclists and pedestrians on their way to school.
- 5.05 It is noted that nowhere in either the VECTOS STA or in any of the documentation provided by RBC in support of their Draft Local Plan has any consideration of road safety along the A45 been provided. Any Local Plan that does not consider the implications of siting a major new housing development on a road where there have been 41 accidents over a 3 mile stretch in the past 5 years cannot be regarded as sound.

6.0 Summary & Conclusions

Summary

- 6.01 This Technical Note (TN3) has been prepared by *Lawrence Walker Limited (LWL)* in response to a request by the *Stand Against Lodge Farm Village (SALFV)* group to examine the traffic implications of a proposed housing allocation by *Rugby Borough Council (RBC)* at Lodge Farm in Warwickshire. The proposed allocation would see 1,500 units constructed across the site as shown at **Appendix A**, with 665 being provided within the Plan Period.
- 6.02 Technical Note (TN3) has been prepared by *Lawrence Walker Limited (LWL)* in response to a request by the *Stand Against Lodge Farm Village (SALFV)* group to examine the traffic implications of a proposed housing allocation by *Rugby Borough Council (RBC)* at Lodge Farm in Warwickshire. The proposed allocation would see 1,500 units constructed over the Plan Period, as show at **Appendix A**.
- 6.03 In support of the allocation RBC commissioned VECTOS to undertake a *Strategic Transport Assessment (STA)* and this TN3 effectively provides a critique of the June 2017 version of that assessment, together with an overview of other transport issue. In so doing it should be noted that LWL is based at Leamington Hastings in Warwickshire, which is less than 5 miles from the Lodge Farm site and just 4 miles from the A426/B4429 (formally A45) Dunchurch Crossroads; a notorious local bottleneck through which much of the traffic produced by Lodge Farm would need to pass. This, together with 25 years of experience in major projects in Coventry, Daventry and Rugby gives LWL a unique insight into the challenges presented by the proposed Lodge Farm allocation.

Conclusions

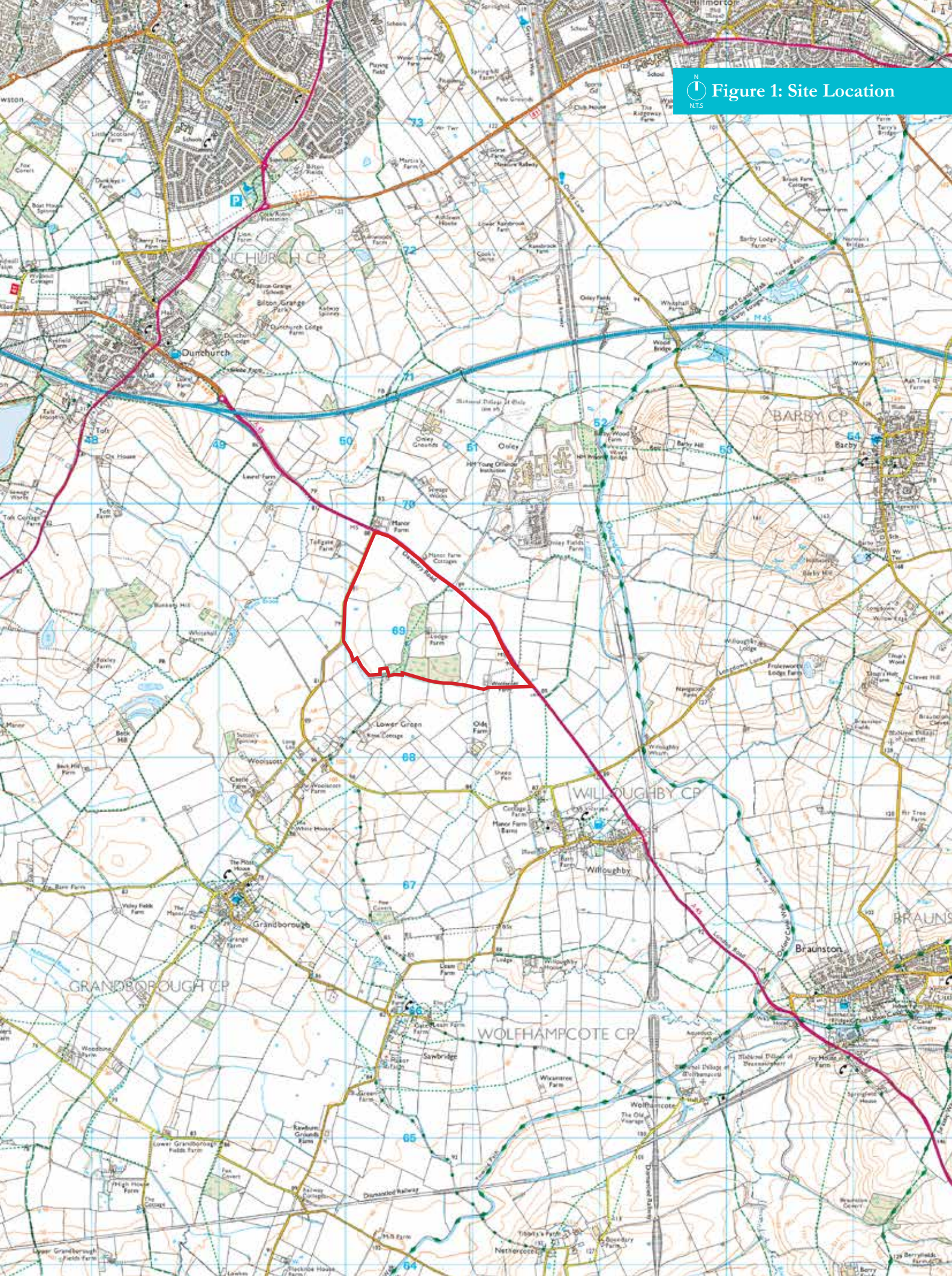
- 6.04 The main findings of the TN3 Report are as follows:-
- i) The STM traffic model developed by VECTOS does not properly include Lodge Farm and does not consider impacts at Daventry and along the A45 through to the M1 to the south, where traffic is already known to cause issues. This is not an acceptable approach, given the scale and proximity of the site to Daventry. The model is not therefore fit for purpose as it currently stands;
 - ii) The Dunchurch Crossroads represents a serious impediment to development to the south of Rugby and this is fully recognised by VECTOS, who advises that *any* increase in traffic at this location would be *“highly undesirable”*. Given they also acknowledge that *“there is limited capacity in this area to provide additional improvements”*, their recommendation is *“to promote options which limit the amount of additional traffic which is likely to travel through the Crossroads as the Local Plan is brought forward”*. Their recommended approach has not been followed by RBC, who instead seeks to promote the delivery of Lodge Farm;
 - iii) In order to support Lodge Farm, an interim improvement is required at the Dunchuch Crossroads. This interim improvement has not been properly identified, or its impacts on the existing Listed Buildings, Statues and Monuments assessed, which are all major omissions for what is a significant allocation within the Local Plan. Such an interim solution is fundamentally not deliverable in LWL’s view;

- iv) WCC's record in delivering large-scale infrastructure to support development is very poor. LWL would draw a comparison with the *Rugby Western Relief Road* in this context, which was delivered 10 years late and at a cost of some 6 times the original £10.5m budget. As a result, any claims made within the Local Plan draft submission document with regards to the delivery of the SWLR must be regarded with a high level of caution;
- v) Notwithstanding the unlikelihood of WCC delivering either the SWLR as required or providing a meaningful localised improvement at the Dunchurch Crossroads, the two schemes combined would still only provide a "Nil-Detriment" solution when measured against any of the 2021, 2026 or 2031 Reference Cases. This means that at all stages of the evolution of Lodge Farm the traffic and AQ situation through Dunchurch will be markedly worse than it is today (2016). Since this position is already intolerable and breaches statutory AQ limits, this is not an acceptable proposition and contravenes Para's 30 & 32 of the NPPF;
- vi) The site does not sit on, or close to, an established Public Transport route and one could not be provided on an economically viable basis. As such allocation of the site would not meet the requirements of Para's 34 & 17 of the NPPF; the latter instead requiring LPA's to *"make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable"*. It will never be possible to walk or cycle to the site due to its remoteness and the presence of the A45;
- vii) The A45 between Dunchurch and the M1 to the south can demonstrably be seen as a very real concern in terms of road safety and is clearly not a suitable place to locate a new residential development for that reason alone. Nowhere in either the VECTOS STA or in any of the documentation provided by RBC in support of their Draft Local Plan has any consideration of road safety along the A45 been provided. Any Local Plan that does not consider the implications of siting a major new housing development on a road where there have been 41 accidents over a 3 mile stretch in the past 5 years cannot be regarded as valid.

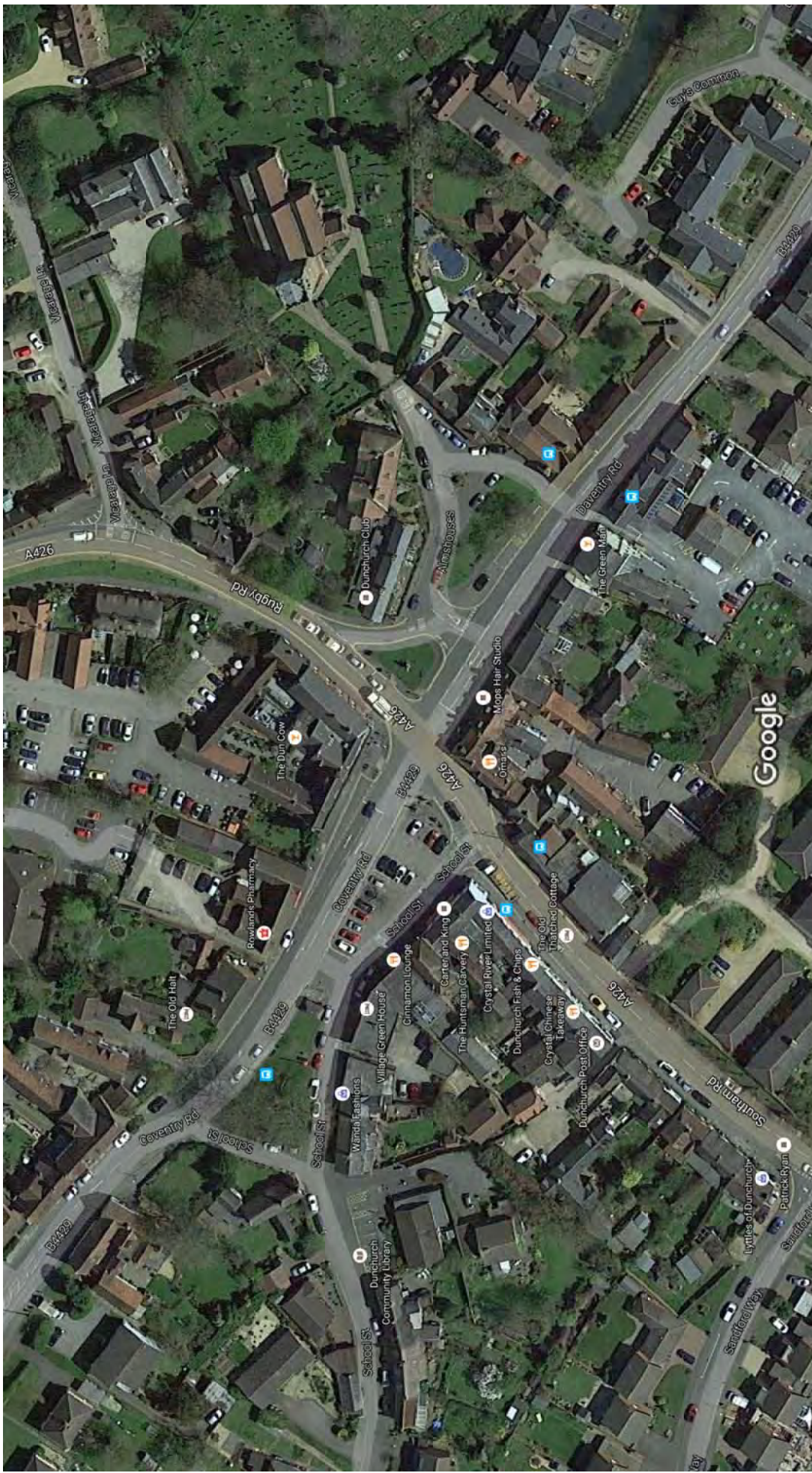
6.05 Based on the above findings, it is LWL's opinion that the allocation of Lodge Farm is unsound and it should be removed from the Local Plan.

Appendix A
Site Location Plan

Figure 1: Site Location



Appendix B
Dunchurch Crossroads











Appendix C

Flore Hill Crossroads







Appendix D

Existing Public Transport Provisions

Hillside Estate • Rokeby Estate • town centre • Eastlands Rd • Clifton

MORNDAYS TO SATURDAYS

Stop	0948	0950	0952	0954	0956	0958	1000	1002	1004	1006	1008	1010	1012	1014	1016	1018	1020	1022	1024	1026	1028	1030	1032	1034	1036	1038	1040	1042	1044	1046	1048	1050	1052	1054	1056	1058	1100	1102	1104	1106	1108	1110	1112	1114	1116	1118	1120	1122	1124	1126	1128	1130	1132	1134	1136	1138	1140	1142	1144	1146	1148	1150	1152	1154	1156	1158	1200	1202	1204	1206	1208	1210	1212	1214	1216	1218	1220	1222	1224	1226	1228	1230	1232	1234	1236	1238	1240	1242	1244	1246	1248	1250	1252	1254	1256	1258	1300	1302	1304	1306	1308	1310	1312	1314	1316	1318	1320	1322	1324	1326	1328	1330	1332	1334	1336	1338	1340	1342	1344	1346	1348	1350	1352	1354	1356	1358	1400	1402	1404	1406	1408	1410	1412	1414	1416	1418	1420	1422	1424	1426	1428	1430	1432	1434	1436	1438	1440	1442	1444	1446	1448	1450	1452	1454	1456	1458	1500	1502	1504	1506	1508	1510
Dunchurch Rd opp. Sainsbury's	0948	0950	0952	0954	0956	0958	1000	1002	1004	1006	1008	1010	1012	1014	1016	1018	1020	1022	1024	1026	1028	1030	1032	1034	1036	1038	1040	1042	1044	1046	1048	1050	1052	1054	1056	1058	1100	1102	1104	1106	1108	1110	1112	1114	1116	1118	1120	1122	1124	1126	1128	1130	1132	1134	1136	1138	1140	1142	1144	1146	1148	1150	1152	1154	1156	1158	1200	1202	1204	1206	1208	1210	1212	1214	1216	1218	1220	1222	1224	1226	1228	1230	1232	1234	1236	1238	1240	1242	1244	1246	1248	1250	1252	1254	1256	1258	1300	1302	1304	1306	1308	1310	1312	1314	1316	1318	1320	1322	1324	1326	1328	1330	1332	1334	1336	1338	1340	1342	1344	1346	1348	1350	1352	1354	1356	1358	1400	1402	1404	1406	1408	1410	1412	1414	1416	1418	1420	1422	1424	1426	1428	1430	1432	1434	1436	1438	1440	1442	1444	1446	1448	1450	1452	1454	1456	1458	1500	1502	1504	1506	1508	1510

bus numbered 13 & starts at Braunston (London Rd) 0930, Willoughby (Main Rd) 0934, Only Park 0939, Rye Hill, 0935, Onley Park (Main Rd) 0940 & Dunchurch (War Memorial) 0944.

bus numbered 13 & starts at Onley Park (Opp Rye Hill) 1500, Onley Park (Main Road) 1502, Dunchurch (Opposite War Memorial) 1506. Continues to Rugby rail station after Clifton Road arriving at 1530.

Sch runs on school days only
 • bus that run via South Rd stop opposite Bull Inn

bus starts at Rugby High School 1555, and continues beyond Newton Lys, to Camrose (Cherry Tree) 1602, Swinford 1638, South Kilworth (White Hart) 1643 & North Kilworth (White Lion) 1648

EF starts at Elliotts Field at 1250







GIVE WAY

bus stop

Appendix E
Accident Data

41
Casualties
over 3 miles
in 5 years



High
Risk
Crash
Route



