

Willoughby Parish Council

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26th October 2016

Dear Sirs,

RE: Rugby Local Plan - Proposed 'Lodge Farm Garden Village' DS10

We write to register our objections to the inclusion of land proposed to be developed as Lodge Farm Garden Village ('DS10').

Our objections to the current scores and proposed revised scoring given to DS10 in the Sustainability Assessment Framework are as follows:

SA1 REDUCE AND ELIMINATE POVERTY: Revised to: negative and justifies a — — score:

- siting away from the town and its amenities on the edge of the Borough will isolate the community;
- the anticipated high cost of infrastructure and the projected delivery of only 840 houses in the plan period will result in negligible or no affordable housing;
- the increase in executive style housing will increase social exclusion;
- the burden on extremely limited rural facilities, schools, pressure on doctors' surgeries and traffic will increase disadvantage;
- high quality broadband delivery does not reduce inequality/social exclusion per se

SA2 ACCESS TO SERVICES, LEISURE AND CULTURE: Revised to: negative and justifies a — score:

- the allocation does not propose any leisure or cultural opportunities. The requirement for public transport links in DS10 is not supported in the Infrastructure Delivery Plan. There is no provision for delivery or forcing private suppliers to do so;
- access to facilities in Rugby, Daventry and surrounding areas will, of necessity, be by private motor car
- proposed land for GP surgery is not supported with funds to build, operate or provide GPs who are in short supply in other surgeries locally;
- provision of commercial space is not quantified, costed or funds for development identified.
- In short, there is no deliverable plan for services Leisure and Culture in SA2

SA3 PROMOTION OF THE HEALTH OF THE POPULATION: Revised to: significant negative effect and justifies a — — score:

- additional traffic for all purpose which will be generated by this development through Dunchurch, South to Daventry and through surrounding villages will significantly increase air pollution. The Dunchurch intersection is already designated an AQMA;
- healthcare facilities are not accessible within walking distance further promoting the use of private transport;

- there is no deliverable plan for doctors' surgery (see SA2 above)

SA4 PROVIDE AFFORDABLE AND DECENT HOUSING: Revised to: minor negative effect and justifies a — score:

- the anticipated high cost of infrastructure and the projected delivery of only 840 houses in the plan period will result in negligible or no affordable housing;
- no affordable housing provision by plan stage is provided in the consultation documents disclosed;
- the remoteness of the site will significantly reduce the practicability for unemployed or lower income families to live there due to the lack of public transport and limited access to private transport as well as the additional cost of travel to schools/college/supermarkets/leisure facilities;
- an executive style housing estate will further limit social integration

SA6 PROVIDE A STRONG AND STABLE LOCAL ECONOMY: Revised to: significant negative effect and justifies a — — score:

- limited employment opportunities exist in the area and little opportunity will exist on site;
- residents will be forced to drive to employment areas in Coventry/Daventry/J16 M1 enterprise zone and DIRFT (which is being expanded)
- traffic to employment onto the A45 will be substantially increased with the consequent impact on surrounding villages up to M1 J18, Daventry, North into Coventry and beyond;

SA7 PROMOTE VITALITY AND VIABILITY OF TOWN CENTRE: Revised to: minor negative impact and justifies a — score:

- traffic congestion into Rugby from the site will discourage residents from shopping and trading in the Town. Residents, as they currently do in surrounding villages, will choose the trading centres on the outskirts of Coventry, in Daventry, Fosse Park Leicester via the A45 thus depriving the town of revenue and increases the shopping miles by car;

SA8 PROMOTE REGENERATION OF URBAN AREAS: Revised to significant negative impact and justifies a — — score:

- the site is completely isolated from the urban area so fails this test;
- the anticipated high cost of infrastructure and the projected delivery of only 840 houses in the plan period will result in negligible or no affordable housing;
- see response to SA7 above;

SA11 REDUCE THE BOROUGH'S CONTRIBUTION TO CLIMATE CHANGE: Revised to: significant negative effect justifies a — — score:

- private vehicle access to employment/secondary schools/college/leisure facilities will significantly impact upon air quality;
- no plan for delivery of improved public transport and very limited bus service currently available;
- community services and facilities in surrounding villages are extremely limited and no plan for effective delivery for 800 houses in the plan period. This site could never operate as a self contained Main Rural Settlement within the plan period as alleged;

SA12 AVOID, REDUCE AND MANAGE FLOOD RISK: Revised to significant negative impact and justifies — — score:

- no coherent flood risk assessment or mitigating plans available and risks currently remain unknown, especially with reference to the impact on neighbouring villages

- change of greenfield land to concrete surfaces will create water run off with a corresponding reduction in the capacity for permeation and collection of surplus water. This is especially significant in a zone susceptible to flooding by the Rainsbrook and Leam River which occurs regularly on the A45, Willoughby, Grandborough, Sawbridge and surrounding villages;
- by reason of the flooding it is reasonably foreseeable that the additional water run off rate into the Rainsbrook and the Leam River it will cause back up in the Leam River resulting in corresponding flooding of neighbouring villages and land;
- The need for deployment of SuDS will reduce the available space for containment on the site;

SA14 PROMOTE A SUSTAINABLE TRANSPORT NETWORK: Revised to significant negative effect justifies a — — score:

- the Strategic Transport Assessment (STA) only extends to Rugby Town, DIRFT and a limited number of villages. It fails to make any assessment of the traffic impact from the proposed development site so no, or no satisfactory, assessment has been undertaken. The scoring is fundamentally flawed therefore;
- the Rugby Wide Area S-Paramics micro-simulation model used does not extend southwards along the A45 as far as the proposed Lodge Farm allocation. It does not include the potential 'rat runs' through surrounding villages along Longdown Road/The Ridgeway/Willoughby/Grandborough/Flecknoe etc. Given the proximity of the site to the A5, M1J18 and J16, M40 and M6 the area assessed should extend to Daventry, and all villages in the area and taking account employment areas in Daventry. The relationship of prospective residents of Lodge Farm with these areas should be fully explored or a study should demonstrate why they have been excluded;
- it has not been established that the proposed spine road will mitigate the impact of traffic on villages south of Dunchurch through to Daventry.

It is accepted that there is a need for the plan to comply with the NPPF to boost the supply of housing. RBC have already granted planning permissions which would largely satisfy their allocation. My objections to the inclusion of DS10 in the Rugby Local Plan includes the absence of any assessment of why provision needs to be made on a greenfield site in a location outside of its development strategy to achieve compliance with the NPPF. The plan acknowledges the significant supply of existing permissions/allocations and how this is expected to be delivered. It does not explain or provide any analysis of why delivery of the existing allocation and infrastructure connected with it could not be brought forward. Without this the addition of DS10 cannot be justified. Further, there is no evidence that including DS10 will actually increase delivery or delivery rate within the plan period.

The site at Walsgrave Hill Farm has belatedly been removed from the plan. This allocation would have provided a more sustainable site which would meet the housing overflow from Coventry which Rugby agreed to meet. The decision to remove it is contrary to the argument that additional allocations are necessary or justified.

Yours Faithfully

Mike Thomas (Chair Willoughby Parish Council)