Grandborough Parish Council Newsletter

December 2016

Lodge Farm Proposed Development

The Parish Council have submitted a number of objections to the Rugby Borough Council Local Plan Publication Draft. The comments made reflect opinions of parishioners voiced at recent public meetings, discussion before recent Parish Council meetings, and comments made in returned Parish Plan questionnaires. Our comments are reproduced in full below, showing first the relevant section in the Rugby Borough Council proposals and their 'Sustainability Assessment'; and then our comments.

DS 10 Lodge Farm – Areas of disagreement with Sustainability Assessment

1)Provide good quality local services, leisure and cultural opportunities with good access for all sections of the community. SA – Not in any settlement, but alongside 2 bus stops on Daventry Road: a minor negative

Comment: The regular Rugby – Daventry bus that used the A45 has been deleted, and there is now a minimal bus service. It is unlikely that any improved service would be viable, at least until well into the build programme, which at 25 houses in 2020 and 80 pa thereafter is likely to take a very long time. In the meantime the early residents will have no service. Similar comments apply to the projected shop, school (and possible doctor's surgery). The SA score should be a major negative. The Grandborough Parish Council Parish Plan Survey carried out in the first week of September 2016 asked residents if they thought the proposed development would be beneficial to the parish. 87% said no. The 8 respondents who thought it might be beneficial gave reasons such as the provision of a local shop, local school, affordable housing, local Doctor's surgery. It is apparent that these perceived benefits are unlikely to be delivered for at least 15 years if ever. Had this information been available in early September it is quite likely that there would have been a 100% response perceiving no benefit.

- 2)Promote/improve health of population. SA Green infrastructure, and possible Doctors Surgery, but additional air quality isssues at Dunchurch. Minor positive or minor negative. Comment: Site will contribute additional traffic to the Dunchurch intersection, already designated as an Air Quality Management Area. Healthcare centre or GP facilities are proposed but given slow build-up of site deliverability must be extremely unlikely. The SA score should be at least a minor negative.
- 3)Provide affordable and decent housing, which meets the needs of the Borough. SA Large site, 1500 homes, will make a significant contribution to meeting Borough's housing needs. A major positive.

Comment: Given the cost of infrastructure required on this remote greenfield site, and the slow build up of house numbers, the likelihood of any affordable housing being built is extremely low or non existent.

The SA score should be at least a minor negative.

4)Reduce crime and perception of crime and anti-social behaviour. SA – no direct effect.

Comment: Already there are concerns within nearby local communities that the creation of a new chunk of urban development, albeit with fields around, will lead to an increase in crime and anti-social behaviour. The SA score should be a minor negative.

5) Promote/enable a strong, stable and sustainable local economy. SA – two bus stops and the 'promise' of future public transport links. A minor positive score.

Comment; See above re bus stops and likelihood of further infrastructure provision. Due to traffic difficulties in accessing Rugby Town Centre through Dunchurch, Rugby Town will lose out on valuable trade and commerce as residents will likely choose the outskirts of Coventry accessed via the A45 dual carriageway or Daventry for social, shopping and other economic activities. SA score should be a minor negative impact.

6)Promote the vitality and viability of the town centre. SA score no impact.

Comment: See above re access to town centre. <u>SA score should</u> be a minor negative.

7) Reduce the Borough's contribution to climate change. SA – Not in settlement, but two bus stops: negligible effect Comment: See above re bus stops. This means that all movement to/from the development will be by private vehicle for the foreseeable future, this surely means at least a minor negative impact.

8)Avoid, reduce, manage flood risk. SA – Outside flood zones 3a and 3b therefore minor negative.

Comment: The site is a large tract of agricultural land with high absorbency, and significant flood water storage, sited at the top of the Leam catchment. Despite Rugby Borough Council policy to require developers to ensure that run off is no greater than current, there is a very real prospect that this requirement will not be met. Surely a significant negative.

9) Promote a sustainable and accessible transport network. SA – two bus stops: minor positive.

Comment: First, we do not accept that the presence of two bus stops should generate a minor positive score, and in any event please note comments re bus service above.

Furthermore, while the proposed location has good access to the A45/M45 for East/West travel, any traffic heading to Rugby will go via Dunchurch crossroads, thus replacing traffic flows which the proposed new spine road is designed to remove. Traffic heading from the development towards Warwick, Leamington Spa, Gaydon, M40 South, or Southam will use existing country lanes through Grandborough. These roads have long stretches of single track with passing places, two narrow hump back bridges, and a sharp right angle turn right in the centre of the village. The roads are also liable to flooding at many points.

(The suggestion that such traffic flows will be minimised by introducing measures to discourage motorists – presumably traffic humps, chicanes, etc. – is laughable. Such measures do not stop drivers who perceive a route is a short cut, and certainly not those who rely on sat-nav. Existing villagers will therefore be subject to greater inconvenience, even more noise, and the probability of traffic vibration induced damage to property, with no benefit in reduced traffic flows)

All of the above points to an SA score of significant negative.

10) Conserve and where possible enhance the Borough's biodiversity, flora and fauna. SA uncertain/minor negative/no impact/minor positive.

Comment: The overall impact on biodiversity and local wildlife sites is unknown because an environmental impact assessment has not been carried out. However, it is clear that no positive impact can be gained from placing a modern village in open green spaces: it will not lead to habitat creation, nor conserve or enhance species diversity.

Tim Marlow MCIEEM, a respected Ecological Consultant has already objected to this plan on the grounds that:

"site falls within an area which is significant at county level for the populations of declining farmland birds it supports"

"Surveys of six farms in Warwickshire undertaken by the author on behalf of Natural England have shown both the breeding and wintering densities of the former 19 PSA species associated with arable farmland at Toft Farm to be some of the highest in the county. Critically the site lies at a strategic point where the Dunsmore and Felden NCA connects to the Northamptonshire Uplands NCA and the Leicstershire Vales NCA. These NCA's have been identified by Natural England as priority target areas for the establishment of Countryside Stewardship Agreements.

Farmland bird populations in these NCA's would be isolated from each other by the proposed development which would act as a dispersal barrier."

The SA score should be at least a minor negative.

11) Maintain and where possible enhance the quality of landscapes. SA – Could be minor negative, but design and screening could mitigate.

Comment: The site lies in the centre of a 'bowl' with currently beautiful landscape views from East, West, North, South. No amount of screening will be able to hide this urban blot. This should definitely be a negative, probably a significant negative.

Summary

The more realistic SA scoring outlined above clearly demonstrates that this is not an appropriate site for a development of this nature, or any nature.

Furthermore, if the development were to be allowed it will be classified as a Main Rural Settlement, and thus would provide a 'core' for further development outside the site boundaries. Indeed further land north of the A45, adjacent to the site, but running from the M45 bridge over the A45 eastwards, has been offered for development and apparently accepted by Rugby Borough Council as potentially suitable.

The current proposal is for 1500 houses on a 105 hectare site—though we question the figure of 1500, since developers will be looking for much higher densities, especially given infrastructure costs: up to 3000 would be more realistic, and the land north of the A45 could accommodate another 5000.

Had the proposal been for land adjacent to the A45, but to the west between Dunchurch and Coventry it might have more validity, since such a location would provide easy access to A45, M45, Western Relief road, new Spine road, and reasonably wide routes to the South. Or, even better, the original Walsgrave site, adjacent to Coventry (whose housing site shortfall we are required to assist with), and with excellent infrastructure already largely in place.

SDC5 Flood Risk

The proposed policy would in effect require developers to ensure that surface water run off is no greater after development than before

Comment: Given the known extent of regular flooding within the Borough and in downstream locations outside the Borough, the policy as currently formulated does not go far enough. All future developments should include provision for water capture and retention, with run off only allowed when there is no downstream risk of flooding.

GP2 Settlement Hierarchy

Comment: The restriction on development in Rural Villages to sites within the existing boundaries has unhealthy consequences for such villages. Over time the housing mix changes as residents add extensions. The number of 2 or 3 bedroom homes is reduced. At the same time there is a tendency for residents, once settled, to remain for very long periods, and average age of the local population increases. There is limited scope for 'new blood' to enter the village.

The policy should allow limited developments of say 5 to 8 houses, with a majority 2 or 3 bedroomed, in each period of say 5 years. This would ensure the continued vibrancy of the local community, within manageable limits.

Additional Consultation Period.

Rugby Borough Council is holding a second six week period of consultation from 30th November to 11th January. If you have not already commented you can do so now

Parish Plan

The analysis of the responses to the Parish Plan Questionnaire can now be viewed on the Parish Council website (a hard copy is available on request). The Parish Council will be discussing this analysis and developing an Action Plan to guide its future activities at its meeting in January

Dates of Parish Council Meetings in 2017

Tuesday 3rd January

Tuesday 7th March

Tuesday 2nd May

Tuesday 4th July

Tuesday 5th September

Tuesday 7th November

All meetings are held in the Village Hall starting at 7:45pm.

All meetings are open to the public, and there is an opportunity before the meeting starts for any observer to comment on any Parish issue of concern to them.

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