

Your ref: R24/0111

My ref: 240111_2



Communities

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Ms Nicola Smith
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RUGBY BOROUGH COUNCIL
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FAO : Ella Casey

25th February 2025

Dear Ms Smith,

PROPOSAL: Redevelopment of the former football pitch and tennis courts associated with the adjacent employment use, including demolition of the existing pavilion and all other remaining structures and enclosures relating to the previous use of the site; and the erection of 134 dwellings, accesses, landscaping, parking, drainage features and associated works.

LOCATION: Land North of Rounds Gardens, Rugby.

APPLICANT: Sam Rogers, St Modwen Homes.

Warwickshire County Council, hereby known as the 'Highway Authority', has undertaken an assessment of the planning application.

Based on the assessment and appraisal of the development proposals the Highway Authority considers that insufficient information has been provided to fully assess the highways impacts of the proposals, and therefore **objects** to the planning application pending receipt of further information, the justification for which is set out below.

Analysis:

The Highway Authority previously submitted an interim (objection, pending further information) response to this planning application. This covered the Highway Authority's assessment of the active travel and public transport elements of the proposed development together with comments in respect of road safety. A copy of the interim response is appended to this letter.

Subsequent to this the applicant has updated the proposed development, undertaken further technical work and has provided the Highway Authority with additional information in respect of traffic modelling, active travel infrastructure and road safety. The current position in respect of this information and the requested **additional information** is summarised below.

*Working for
Warwickshire*

1. Strategic Traffic Modelling:

The applicant has undertaken area-wide traffic modelling using Rugby Wide Area Model (RWA Model). The results were reviewed by the Highway Authority and the following issues were raised in respect of the impact of the proposed development:

- *Rugby Gyratory:*
There are residual cumulative impacts at Rugby Gyratory associated with Local Plan development at South West Rugby. Based on the thresholds set out in Advice Note 003 in the Warwickshire County Council (WCC) modelling protocol, the modelling results show increases in average queues and journey times between Scenarios 3 and 4 during the AM and PM periods which are graded 'severe' or 'very severe'. This suggests that these residual cumulative impacts are likely to be further exacerbated by the proposed development.
- *Evreux Way roundabout:*
Based on the thresholds set out in Advice Note 003, there is an increase in queuing on Arm A - Newbold Road SB which is graded 'severe' during the AM peak hour between Scenarios 3 and 4.
- *Route 8 Section 2 WB:*
The initial modelling results show sustained increases in average journey times on this section of route across the 1600-1900 PM 3-hourly period between 2031 Reference Case (Scenario 1) and the 2031 Reference Case + Development (Scenario 2). There is also an increase in average journey times during the 1800-1900 PM post peak hour between the 2031 Local Plan (Scenario 3) and 2031 Local Plan + Development scenario (Scenario 4).
- *Route 8 Section 1 WB:*
A queue increase during the AM post-peak hour from 481 seconds in Scenario 3 to 635 seconds in Scenario 4 (a 32% or 154 seconds' increase).

Given the proximity of these junctions and routes to the proposed development, the Highway Authority were concerned that the development would further exacerbate residual cumulative impacts. Further information was requested to determine the extent to which these increases are likely to be attributable to the proposed development.

Analysis of the additional information identified a number of statistically significant impacts occurring in the 2031 Reference Case scenario as a result of the development. The assessment confirmed that the Rugby Gyratory experiences congestion during the PM Peak hour within the 2031 Reference Case scenario and that the introduction of the development traffic adds to this congestion and causes it to take longer to dissipate. The impacts identified at the Rugby Gyratory may also lead to wider congestion effects on surrounding residential roads with traffic seeking to "rat run" to avoid congestion.

In view of this, and consistent with the findings of other development applications in the locality and recent assessment work to review the impacts associated with allocated Local Plan development at South West Rugby, the Highway Authority considers that cumulative adverse impacts at the Rugby Gyratory requires a mitigation package if these impacts are to be addressed in the longer term.

As no deliverable mitigation scheme to address cumulative traffic impacts at the Gyratory has yet been identified, the Highway Authority is seeking developer contributions towards a detailed Feasibility Study to consider options for addressing

these impacts. As the cumulative traffic impacts analysis indicates that the proposed development is likely to exacerbate congestion impacts at the Rugby Gyratory, the Highway Authority will seek a proportionate (s106) contribution towards the Feasibility Study from this development.

It is understood that the applicant does not have an in principle objection to contributing toward the costs of the Feasibility Study, noting that the precise amount is yet to be confirmed.

2. Newbold Road Junctions Traffic Modelling:

The Stage 1 Road Safety Audit (RSA) raised concerns in respect of the impact of the development and the proposed one-way system on queue lengths and “blocking back” at the junctions between Newbold Road and Duke Street and St John’s Street. Specifically, there was a concern that the development may cause blocking on both Duke Street and St John Street, which given the location of existing on-street parking raises safety issues. The applicant was requested to undertake further detailed traffic modelling of these junctions to enable a full assessment of this issue.

The applicant subsequently undertook junction modelling and provided the Highway Authority with copies of the models for review (models received 7th February 2025). As the submitted traffic models did not include the required “2031 Local Plan with and without development scenarios” the Highway Authority requested (13th February 2025) that it be provided with copies of these models. The Highway Authority has yet to be provided with copies of these models.

In addition, the Highway Authority’s assessment of the submitted junction models has identified several issues that need to be addressed. It is considered that the model “blocking” function may not be set up correctly, including in respect of the 'Obstruction other lane' values, and the lanes that the obstructions have been applied to, the minor road lane widths and the junction visibility splays.

In summary, the outstanding issues with regard to the traffic modelling provided by the applicant for Duke Street, Hill Street and St John Street are:

- 2031 Local Plan scenario models have yet to be provided.
- Junction geometry is incorrect, and visibility splays appear to be optimistic.
- The “Lane Sim” models do not appear to have been constructed correctly to reflect the relevant situations.

As such, without the additional information listed above, including appropriate corrections to the models, the Highway Authority cannot form a decisive conclusion about the safe operation of these junctions. A plan of the measured geometry and visibility and any other pertinent assumptions should be provided such that the Highway Authority can be assured that the models correctly reflect the intended operation of the junctions.

It is requested that the applicant provides the additional information, amends the junction models and submits these to the Highway Authority for further assessment.

3. Active Travel:

The Highway Authority previously requested further information in respect of:

- Secure cycle storage.
- On-site walking, wheeling and cycling routes.

- Onward connection between York Street and Dale Street.
- Off-site walking, wheeling and cycling routes.
- Off-site walk, wheeling and cycle improvements.

The applicant has provided additional information and/or updated the development proposals in respect of these issues as summarised below.

Secure Cycle Storage:

All dwellings are to be provided with cycle parking in garages or sheds, in accordance with the details shown in Appendix A of Technical Note 0554_TN_01_A, dated 13th February 2025.

The Highway Authority considers this to be acceptable and that these facilities can be secured by a suitably worded condition.

On-site walking, wheeling and cycling routes:

The public open space plan provided in Appendix B of Technical Note 0554_TN_01_A, dated 13th February 2025 indicates that the shared footways/ cycleways will be 3m wide and provided with all-weather surfacing. It is also noted that lighting and seating will be provided within the public open space, whilst to the north-east of the site, the existing pedestrian gate at the boundary of the site will be removed to facilitate the connection with Essex Street. The Highway Authority considers this to be acceptable.

The Highway Authority agrees that the details of the of lighting within the open space and the footbridge design, including parapets, can be secured by condition.

Onward connection between York Street and Dale Street

This relates to the path between York Street and Dale Street which runs parallel to and outside the site's southern boundary and provides one of the key active travel links between the site and Rugby town centre.

The Highway Authority will seek a s106 contribution towards the improvement of this active travel link. As set out in Technical Note 0554_TN_01_A, dated 13th February 2025, the applicant is in agreement with this request.

Off-site walking, wheeling and cycling routes:

The Highway Authority had sought clarification on whether the active travel routes 2 and 3 in the submitted Travel Plan would be compromised by the proposed one-way system to the east of the site. The applicant has undertaken further analysis and now proposes that Princes Street, King Street and Hill Street be signed to permit contraflow cycling. However, as Dale Street has parking on both sides for its entire length and is below the recommended width for contraflow cycling it is not considered suitable for a contraflow facility.

The Highway Authority welcomes the further analysis to show how cycle permeability within the proposed one-way system may be implemented and supports the proposals for contraflow cycling along Princes Street, King Street and Hill Street subject to the details being assessed and found to be acceptable by an independently prepared Stage 1/2 Road Safety Audit (RSA).

Whilst the inability to provide for contraflow cycling along Dale Street is not ideal, it is observed that there are alternative routes to/from the town centre via Duke Street/Hill Street (subject to the findings of the requested RSA) and also via Edward Street to the west of the site.

The Highway Authority will require that an independent Stage 1/2 Road Safety Audit of the proposed contraflow cycling scheme along Princes Street, King Street and Hill Street be undertaken such that it can fully assess the road safety aspects of the proposals and confirm that identified risks can be mitigated. The RSA should be undertaken in accordance with DMRB document GG 119 and Warwickshire County Council guidance.

Further to the Highway Authority's Interim Response the applicant has reviewed the requests for improvements to off-site active travel infrastructure. As set out in Technical Note 0554_TN_01_A, dated 13th February 2025, the applicant has agreed in principle to contribute toward the costs of or delivering (via s278 works) the following active travel infrastructure improvements:

- Scheme 1 - A426 Newbold Road signalised crossing – via a s106 contribution or included in a S278 agreement.
- Scheme 2 – A426 Newbold Road improvements (conversion of existing footway into a shared used path) - via a s106 contribution or included in a S278 agreement.
- Scheme 3 – improvements to path along the southern boundary - via a s106 contribution.

4. Road Safety Audit:

In line with the request in the Highways Authority's interim response to this planning application the applicant commissioned a Stage 1 RSA of the proposed site layout, the site access from Willans Place, and the one-way system around the residential streets to the east of the site. The RSA was reviewed by the Warwickshire County Council (WCC) Safety Engineering Team and following a meeting on 3rd June 2024, the applicant agreed to investigate changes to the proposed one-way system to alleviate safety concerns. Specifically, it was requested that the following should be investigated:

- Provision of traffic calming at regular intervals.
- Provision of physical measures to deter vehicles disobeying the one-way system in key locations.

In addition, it was requested that the applicant undertake further analysis of the operation of the junctions between Newbold Road and Duke Street, St John's Street and Hill Street to help address the safety concerns at these locations.

Traffic Calming:

The developer proposes the installation of full width road humps at c. 70m intervals along straight sections of Dale Street and Princes Street. The aim being to help enforce a 20miles/hour design speed. It is understood that the proposals would not reduce on-street parking capacity.

Whilst the Highway Authority is broadly in agreement with the proposed traffic calming scheme (subject to a Stage 2 RSA assessment of the detailed design), it is considered that it would benefit from additional speed reducing measures, particularly at the southern end of Dale Street and the eastern ends of Duke Street and St John Street in the vicinity of their junctions with Oliver Street and Newbold Road, respectively. These measures could potentially form part of "gateway treatments" designed to reinforce the 20 miles/hr speed limit on entry to the area.

In addition, consideration should be given to providing full width road humps along King Street and the one-way section of Hill Street.

It is requested that additional traffic calming measures be investigated and developed and included in the brief of the Stage 1/2 RSA of the proposed contraflow cycling along Princes Street, King Street and Hill Street (see Section (3), above).

Physical Measures:

The RSA review identified the following locations where it was considered that drivers might disobey the one-way system:

- King Street/Duke Street junction, with drivers potentially tempted to turn right from Duke Street into King Street to access off-street parking.
- Hill Street/King Street junction, with drivers potentially tempted to turn left from Hill Street into King Street.

The applicant proposes a physical island, further signage and hatching to deter vehicles from turning right, from Duke Street into King Street. The proposed design maintains access for fire tenders and refuse vehicles. The Highway Authority will require that the proposed measures be formally considered as part of the Stage 2 RSA assessment of the detailed design of a proposed one-way system.

The applicant considers that it will be impractical to provide physical measures at the Hill Street/King Street junction without removing significant areas of on-street parking. In addition, the applicant considers that the need for physical measures at this junction is reduced as turning into King Street may not be attractive for residents as they would need to park on-street in this part of King Street, against the flow of traffic, and would need to continue in the wrong direction to leave the area.

Whilst the Highway Authority recognises the constraints at this location, it will need to be satisfied that the previously identified safety concerns can be satisfactorily mitigated. As such it is requested that the applicant provides further evidence that all options to address this safety concern have been considered.

It is requested that the safety implications of not providing physical measures at the Hill Street/King Street junction be included in the brief of the Stage 1/2 RSA of the proposed contraflow cycling along Princes Street, King Street and Hill Street (see Section (3), above).

Traffic Queue Analysis of the Duke Street/St John's Street/Hill Street Junctions with Newbold Road:

As set out in Section (2), above, it is considered that additional information is required to enable the Highway Authority to fully assess the performance of these junctions and to form a decisive conclusion about their safe operation.

The Highway Authority considers that the remaining problems identified by the Stage 1 RSA in respect of the internal layout and the access with Willans Place are capable of being addressed at the detailed design stage, when they will be subject to a Stage 2 RSA.

5. Public Transport:

In its interim response to this planning application the Highway Authority identified the need for enhancements to the infrastructure at the bus stops on Newbold Road near junction with Avon Street such that they will meet Warwickshire Quality Bus Corridor

(QBC) specification. As set out in the Transport Assessment Addendum, dated 26th June 2024, the applicant is willing to consider a contribution toward the costs of these improvements.

6. Internal Layout

The proposed development's internal layout and accesses to/from the public highway have been subject to a Stage 1 RSA and the Highway Authority considers it to be broadly acceptable, noting that the detailed design must be subject to a Stage 2 RSA. However, it should be noted that the Highway Authority will not adopt any sections of the internal layout that include shared surface arrangements or do not comply, in full, with Warwickshire County Council Design Guide and highway construction standards.

In addition, it should be noted that in considering the detailed design of the internal layout and the pedestrian and vehicular accesses the Highway Authority will have to be satisfied that: the design supports the achievement of a design speed of 20mph (in line with the advice set out in Section 7.4 of Manual for Streets), that safe passage for disabled and mobility impaired people has been taken into consideration and that the design has taken full account of the findings of the Stage 2 Road Safety Audit.

The Highway Authority will require the provision of secure and sheltered cycle storage and on-site vehicle parking for residents and visitors meeting in full RBC SPD standards in respect of capacity and design.

7. Proposed On-Way System and changes to Traffic Regulation Orders

The implementation of the applicant's proposed one-way system around the residential streets to the east of the site will require changes to the existing Traffic Regulation Orders (TRO's).

The proposed changes to the TRO's will be subject to a formal consultation process, including with residents and businesses who may be affected by the scheme. As such, the Highway Authority will require evidence that the proposed scheme has been consulted upon and found to be acceptable and deliverable prior to any groundworks, remediation or built construction being undertaken at the proposed development site.

Please re-consult the Highway Authority for further comment upon receipt of new and/or amended documents to overcome the above issues.

Yours sincerely,

Stephen Harrison
Development Group

CC – **COUNCILLOR FEENEY – BENN – FOR INFORMATION ONLY**

ADDENDUM: Highway Authority Interim Response, dated 13th March 2024

Dear Ms Smith,

Warwickshire County Council, hereby known as the 'Highway Authority' is currently undertaking a full assessment of the planning application. Whilst this assessment has yet to be concluded the Local Planning Authority have requested an initial response in respect of those elements of the assessment that have been completed. As such, this letter represents an initial response only covering the Highway Authority's assessment of the active travel and public transport elements of the proposed development together with comments in respect of road safety.

The Highway Authority will be providing additional comments on the remaining documents submitted in support of the planning application following completion of its assessment. This may include requests for further information and/or amendments to the proposed development (including off-site works).

Based on the assessment and appraisal of the active travel, public transport and road safety elements of the development proposals the Highway Authority considers that insufficient information has been provided to fully assess the highways impacts of the proposals, and therefore **objects** to the planning application pending receipt of further information, the justification for which is set out below.

Analysis (Active Travel):

1. Secure Cycle Storage:

The proposed 134 dwellings consist of

- 5 x 1-bed apartments.
- 15 x 2-bed apartments.
- 35 x 2-bed houses.
- 57 x 3-bed houses.
- 22 x 4-bed houses.

The Transport Statement notes that the standards require one secure and undercover cycle space per unit and that:

"Secure cycle parking will be provided at each property within the garages or sheds, or within a communal store for apartments."

However, the Rugby Local Plan 2019 Appendix 5 parking standards require the following provision:

Dwelling houses	Long stay – residents/ staff	Short stay - visitors
1-2 bed units	1/ unit secure and undercover	
3 bed units	1/ unit secure and undercover	
4 bed units	1/ unit secure and undercover	
Dwelling apartments	Long stay – residents/ staff	Short stay - visitors
Studio units	1/ unit secure and undercover	1 loop/ hoop per unit
1-2 bed units	1/ unit secure and undercover	1 loop/ hoop per unit
3+ bed units	2/ unit secure and undercover	1 loop/ hoop per unit

Therefore, the requirement will be to provide one long stay secure and undercover cycle space per unit (134) plus one short stay loop or hoop per apartment (20).

The Rugby Planning Obligations SPD 2012 provides more information about cycle parking including that short-stay parking stands should be able to secure the frame and both wheels and residential loops should be near to the front entrance of the property.

It is requested that the applicant provides further details of number, location and type of cycle parking facilities, including information on access, lighting and security.

2. *On-site walking, wheeling and cycling routes:*

The proposed pedestrian/ cycle strategy (Figure 4-1) in the Transport Assessment shows quiet streets, 3m shared footway/ cycleways and 2m pedestrian footways.

The following further information and changes to the proposals are requested:

- Provide additional detail in respect of the lighting and all-weather surfacing of paths.
- Provide details of all connections between footways/ cycleways and vehicle routes such that it can be clearly shown that these will minimise conflict.
- Alter the 2m pedestrian footways shown in the proposed pedestrian/ cycle strategy to 3m shared footway/ cycleways (see blue lines on annotated plan below). The shared footways/ cycleways should be wider at junction points and include seating.
- Ensure that the pedestrian/ cycle access points include 3m footways/ cycleways and continuous, surfaced and lit connections (without barriers) to York Street, Blackman Way/ Rounds Gardens, Hill Street and Essex Street (see blue lines on annotated plan below).



3. *Off-site walking, wheeling and cycling routes:*

The Transport Assessment provides a helpful review of existing facilities as well as audits of four active travel routes:

- Route 1 – Princes Street to Northlands Primary School via Lancaster Road; the audit notes that due to traffic volumes on the A426 Newbold Road and LTN1/20 guidance, the most appropriate type of crossing would be a signalised crossing.
- Route 2 – Princes Street to bus stops on the A426.

- Route 3 – Princes Street/Pedestrian Access to Rugby Town Centre; this includes an unlit footpath between York Street and Dale Street.
- Route 4 – Princes Street/Pedestrian Access to medical facilities and ASDA on Corporation Street; this also includes an unlit footpath between York Street and Dale Street and a footpath with cycle prohibition between Oliver Street and Westway.

It is noted, however, that no active travel routes are suggested to connect with the catchment secondary school, Avon Valley.

The proposed access to the development for motor vehicles is split between East Parcel (references in Transport Assessment to both 85 and 89 properties) with access from Princes Street, and the West Parcel (53 properties) with access from Willans Place. Parking restrictions are proposed. A one-way system is proposed on Princes Street, Dale Street, King Street, Hill Street and Duke Street. It is unclear how this will affect the active travel routes, particularly cycle access. The parcels have a total which is greater than the 134 dwellings currently proposed.

The following further information and changes to the proposals are requested:

- Provide clarification on the number of dwellings actually proposed in each parcel of the proposed development.
- Provide details of cycle permeability through the proposed one-way system and an assessment of safety (this is to be considered as part of the Stage 1 Road Safety Audit).
- Provide an assessment of active travel route(s) to connect with the catchment secondary school, Avon Valley.

The Highway Authority will provide further information in respect of requests for s106 contributions toward off-site infrastructure following completion of the assessment of the submitted application documents. However, in respect of active travel infrastructure the initial view is that the Highway Authority will seek funding to enhance off-site walking and cycling facilities (including PROW improvements and schemes identified in the Warwickshire LCWIP) to encourage new residents to use active travel modes and minimise the number of additional vehicle movements on the local highway network.

This is likely to include, but may not be limited to:

- A signalised crossing on A426 Newbold Road near Essex Street/ Lancaster Road.
- Paths through Rounds Gardens.
- Sections of Public Footpath (RB38) between Oliver Street to Bridget Street), adjacent sections of Newbold footpath plus widening and surfacing improvements and cycle access on footpath section between Oliver Street and Westway.
- Upgrade of crossing on Oliver Street to Toucan.
- Lighting, widening and surfacing improvements on footpath between York Street and Dale Street.
- Improvements along or parallel to A426 Newbold Road, including crossings where required (R08 and R09 in LCWIP) with connections as far as Avon Valley School.
- Signed advisory routes along nearby low traffic roads including Avenue Road and Bridget Street (R11 in LCWIP).

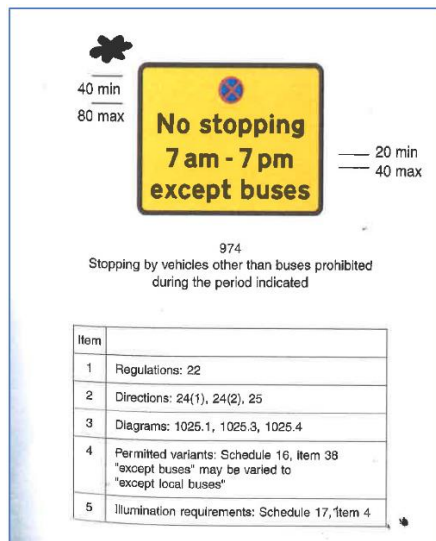
Analysis (Public Transport):

The nearest bus stops to the proposed new residential development are sited to on Oliver Road (to the south) and Newbold Road (to the east). The two pairs of existing bus stops on Oliver Road which have already been subject to enhancement as part of the Long Lawford - Rugby Town Centre Quality Bus Corridor (QBC) Scheme.

However, the bus stops on Newbold Road near junction with Avon Street will require to be enhanced such that they will meet Warwickshire Quality Bus Corridor (QBC) specification, noting that the width of the footways on this section of Newbold Road are too narrow to accommodate bus shelters.

The scale of the works per bus stops to comprise the following:

- Construction of the raised kerbs, tactile paving and specialist paving boarding and alighting area (designed in accordance with the Warwickshire QBC specification standard).
- Provision of bus stop clearway box markings on the carriageway.
- Provision of as No Parking Sign (except buses) to the exact same wording and specification as below to attach onto the existing bus stop poles (with bus flag and timetable case attached) at the bus stops.



It is requested that the applicant updates the proposed development scheme to include the above enhancements to the bus stops on Newbold Road.

Analysis (Stage 1 Road Safety Audit):

Whilst the planning application was not accompanied by an independently prepared Stage 1 Road Safety Audit (RSA), the applicant has confirmed that an RSA is to be undertaken for the proposed off site works and the internal layout and that the findings of this along with a Designer Response will be provided to the Highway Authority in due course. It should be noted that the applicant has also provided the Highway Authority with a copy of the brief for both elements of the Stage 1 RSA's. The Highway Authority has reviewed these documents and has provided comments/recommendations.

The Highway Authority will require that a Stage 1 Road Safety Audit be undertaken such that it can fully assess the road safety aspects of the proposals and confirm that identified risks can be mitigated. The RSA should be undertaken in accordance with DMRB document GG 119 and Warwickshire County Council guidance.

Please re-consult the Highway Authority for further comment upon receipt of new and/or amended documents to overcome the above issues.

Yours sincerely,

Stephen Harrison

Development Group

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