

My name is Julie Warren. I speak on behalf of the majority of residents of Princes Street and the surrounding estate.

We'd like to say a big than you to

- our Ward Councillor, Richard Harrington who has invested a lot of time supporting us and guiding us through this process
- the Council officers, Ella, Lucy and all the supporting specialist teams who have worked so diligently throughout this process
- our MP, John Slinger who attended our residents meeting and who also supports us
- and from me, a big thank you to the residents, especially the core campaign group, many of whom can't be here today, for the enormous amount of effort that's gone into doing our very best to passionately campaign against this development.

Our community has engaged extensively throughout this process, and our evidence supports the Council's refusal reasons.

I will briefly address five matters, being: open space, trees and air quality, biodiversity, design, and highways.

In February 2024, we held a meeting about the proposed development. This was attended by 53 residents from our small estate. We know that in total, nearly 300 letters of objection have been submitted. This demonstrates the strength of feeling that residents hold, against the harms this development would bring.

### **Loss of Sports Provision and Open Space**

Benn Ward has the largest deficit of open space anywhere in the borough, as confirmed by the Council's own evidence base. Therefore, the loss of this facility is not justified. Both Sport England and the Council have been clear that the proposal fails to meet the tests for the loss of a playing field or community facility, and residents strongly share this view.

The development would exacerbate an already severe shortage of open space in this highly populated ward. This directly conflicts with local policy on protecting community facilities, and with national policy, which requires existing open space to be safeguarded unless a surplus can be demonstrated. This is clearly not the case here.

There are other viable alternatives that align with the Council's open-space strategy, retaining the open space, and reinstating the former football pitch and pavilion for public use. This would restore much-needed recreational provision, enhance biodiversity, and address long-standing deficits rather than worsening them.

### **Tree Removal and Air Quality**

The development removes a substantial number of mature and protected trees, as well as a developing wildlife copse. Recent canopy surveys show that Benn Ward has only 12% canopy cover and New Bilton just 8%, both below local and national targets. The Council's emerging Local Plan sets a 20% canopy ambition.

The Forestry Commission has recently invested public money in Rugby, through the Urban Tree Challenge Fund. Removing the trees would undermine both national policy and recent public investment aimed at increasing tree cover in urban areas.

These trees form an important green corridor, providing ecological benefits, screening, cooling, and contribute to air-quality mitigation, in this Air Quality Management Area.

Replacement planting schemes won't replicate these benefits for many decades. The harm is immediate, significant, and long-lasting.

## **Biodiversity and Environmental Considerations**

The application was submitted just three days before the new Biodiversity Net Gain framework came into force and residents are disappointed that this timing means that current rules are not applicable. The submission appeared to have been made in haste, for example, without accurate TPO information, incomplete surveys and surveys carried out at suboptimal times. The Council confirmed that the biodiversity calculation was grossly understated, and wildlife numbers, including bird species, were also understated.

Protected species, including badgers, bats, red kites and hedgehogs, use the site. The loss of habitat and wildlife corridors has not been adequately mitigated. The harm to biodiversity is significant, and residents are strongly against it.

Off-site compensation cannot replicate the mature habitats and wildlife corridors that would be destroyed, and it fails to address the site-specific harm identified by the Council.

## **Design Quality and Character**

The houses proposed for Princes Street are out of keeping with the established Victorian character. They are set back further, use inconsistent materials, and look completely different. The Council recently set a precedent, stipulating precise Victorian styling for the new houses on Princes Street and the current proposal does not meet the same standard.

It is noted that the developer's documentation on design fit excludes any reference to Princes Street. Other attempts to reference the proposed design to local Victorian examples are often tenuous at best. The National Design Guide requires developments to reflect local character. This scheme does not achieve this and residents consider it to resemble a suburban estate rather than something appropriate for this location.

## **Housing Need**

Rugby has a well-documented shortfall of affordable housing, confirmed in the Council's own Housing Needs Evidence. The proposal provides no affordable housing, despite the 30% requirement for greenfield sites set out in Local Plan Policy. The development therefore fails to meet local needs and conflicts with the Council's affordable housing expectations.

## **Traffic Management**

The estate's Victorian layout was not intended to accommodate such traffic volumes as would be created by this development.

The scheme is relying on an unusually complex set of measures for our very small estate: cycle lanes, traffic-calming features and reconfigured junctions. This is not seen to this extent in any other local area.

The proposed one-way system is purely designed around the waste truck route. This prioritises the developer's convenience over residents' safety. Residents would be forced to turn into Newbold Road to exit the estate, causing unacceptable congestion, delay and stress for all. It is understood that the Council would have been open to discussing an alternative one-way system which negates the need to exit the estate onto Newbold Road, but this does not appear to have been explored.

## **Parking**

Residents pay for parking permits. The scheme results in a material reduction in parking spaces available to residents, who already face difficulty parking close to home. The layout removes sections of the public highway from general use by converting them into access and manoeuvring space for new private parking bays. This represents an unreasonable loss of a shared public resource and places additional pressure on already constrained streets.

## **Summary**

The proposal results in significant harm across multiple planning considerations: loss of open space, tree and canopy removal, biodiversity impacts, and poor design quality. None of this harm is justified, any perceived benefits do not outweigh this harm, particularly given the absence of affordable housing and the availability of alternative sites.

Residents strongly object to the impact on the Princes Street estate, particularly the compromise to existing safety regarding egress from the estate and the loss of already limited parking.

On behalf of local residents, I respectfully ask the Inspector to uphold the refusal and protect this vital, urban green space for current and future generations.