

Your ref: R18/0186  
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Mr Rob Back  
Head of Planning & Recreation  
RUGBY BOROUGH COUNCIL  
Town Hall  
Rugby  
CV21 2RR

**FAO : Erica Buchanan**

21<sup>st</sup> March 2018

Dear Mr Back

**PROPOSAL:** Demolition of existing buildings and outline planning application for residential development of up to 137 dwellings (Use Class C3) including means of access from the Rugby Road, new open space and associated infrastructure. All other matters reserved.

**LOCATION:** Coventry Stadium, Rugby Road, Brandon.

**APPLICANT:** N/A

Warwickshire County Council, hereby known as the 'Highway Authority', has undertaken a full assessment, of the planning application. Based on the appraisal of the development proposals and the supporting information provided the Highway Authority submits a response of **objection**. The justification for this decision is provided below.

**ANALYSIS:**

The planning application proposes the redevelopment of the Coventry Stadium on the Rugby Road in Brandon. The development proposals will result in the demolition of existing buildings on the site, to be replaced with 137 dwellings.

The planning application is an outline planning application, with all matters reserved except for access from the Rugby Road, new open space and associated infrastructure.

The development proposals have been assessed in accordance with the following guidance and policy documents.

- National Planning Policy Framework published by Department for Communities and Local Government in March 2012;

*Working for  
Warwickshire*

- National Planning Policy Guidance: Travel plans, transport assessments and statements in decision making published by the Department for Communities and Local Government in March 2014;
- DfT Circular 02/2013; Strategic Road Network and the Delivery of Sustainable Transport; and,
- Warwickshire Local Transport Plan 2011 – 2026, published by Warwickshire County Council in 2011

This section provides commentary on the analysis undertaken by the Highway Authority and the justification for the objection to the development proposals based on this assessment.

### **Transport Assessment:**

The applicants have submitted a Transport Assessment which was prepared on their behalf by David Tucker Associates (DTA).

The Transport Assessment provides an assessment of the potential impacts that the development proposals could have upon the safe and efficient operation of the highway network. Through this process the identification of issues will enable discussion and potential mitigation schemes to be identified and agreed with the Highway Authority.

The Highway Authority has considered this document which based on this assessment and requires further information and clarification to support the application. The justification for this decision is set out below.

The Highway Authority requires the provision of the LINSIG Models to enable a robust assessment of the A46 / A428 Binley Woods Junction to be undertaken. This will enable the Highway Authority to consider the parameters which have been utilised and methodology undertaken in regard to Warwickshire's Highway Network.

The Highway Authority is unable to comment further on the Transport Assessment until this information is provided.

### **Access Arrangements:**

The Highway Authority has significant concerns regarding the ability for the site to be safely accessed. The Highway Authority notes that the applicants have undertaken a Road Safety Audit Stage 1 to support the proposals, however no vehicle tracking drawings have been provided to demonstrate a refuse vehicle nor fire tender can safely enter or exit the proposed access. The application therefore does not accord with Policy LUT 8 of the Warwickshire Local Transport Plan.

A core concern is about the ability for a goods vehicle to enter and exit the site in a safe and efficient manner. The Highway Authority has considered the tracking drawings provided in Appendix 5 of the Transport Statement. Based on this analysis the Highway Authority notes the following concerns.

1. The Highway Authority requires the provision of vehicle tracking drawings for a refuse vehicle (Mercedes Econic 4 Mid-Steer Axle Vehicle) and a standard fire tender.
2. A revised Road Safety Audit is required which assesses the vehicle access arrangements and the vehicle tracking drawings required by the Highway Authority.

**Access by Sustainable Modes:**

The Highway Authority disagrees that the site is located in a sustainable location for residential development. The Transport Assessment and supporting documentation is based around journeys by the car, with other modes an afterthought.

The Highway Authority is not satisfied that journeys can be completed in a sustainable manner especially in regards to walking and cycling movements. In addition with limited public transport provision it is likely that the development will be car dominated, and therefore does not conform with the National Planning Policy Framework.

**SUMMARY & CONCLUSION:**

The Highway Authority has undertaken a full assessment of the development proposals in accordance with national and local planning and transport policy.

Based on this assessment the Highway Authority objects to the planning application. The justification being that the application does not comply with the following paragraphs of the National Planning Policy Framework.

**Paragraph 32:**

*All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether;*

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
- safe and suitable access to the site can be achieved for all people; and,*
- improvement can be undertaken within the transport network that cost effectively limit the significant impacts of the development. development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*

**Paragraph 34:**

*Plans and decisions should ensure development that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.*

**Paragraph 35:**

*Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people.. Therefore, developments should be located and designed where practical to...*

- ...give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;*
- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians...*
- ...consider the needs of people with disabilities by all modes of transport.*

**Paragraph 38:**

*For larger scale residential developments in particular,...key facilities such as primary schools and local shops should be within walking distance of most properties.*

Therefore even with the provision of the modelling the Highway Authority has significant concerns about the accessibility of the development proposals at this time, as elements are contrary to the NPPF. Based on this conclusion the Highway Authority will not support the application in its current form and will maintain an objection unless these issues can be satisfactorily overcome.

Yours Sincerely

*Ben Simm*

Ben Simm  
Development Group

CC –

\*\*FOR INFORMATION ONLY\*\*  
Councillor Timms – Earl Craven