

From: Steve Fancourt [REDACTED]
Sent: 10 February 2018 10:43
To: Programme Officer
Cc: Melvyn McCartney; Carol Seager; Colin Reeves; Richard Allanach; Michael Judge; Pat Judge; Joe Garthwaite; John D Bennett
Subject: Fwd: Fwd: Rugby Borough Local Plan Examination Stage 1 Hearings

Dear Carmel

Thank you for your email 3/2/18 enquiring into sources of traffic count figures and status of local independent traffic survey results we clarify as follows:

1. The estimated traffic projection figures cited in the SAVE Dunchurch email to the Inspector of 31/1/18 were prepared by Colin Reeves who attended the public examination and used the same figures in Day 7's proceedings. They focus on the A45/A4429/M45 junction but by direct implication raise uncertainty about the strategic and local traffic impacts by the introduction of the South West Spine road or not and the DB Symmetry application. They are based on publically available DfT figures for that junction along with projections based on traffic counts carried out by the SARD (Stop Ashlawn Road Development) in/around Dunchurch in 2016.
2. The pending traffic survey commissioned by Dunchurch Parish Council is independent of these A45/A4429/M45 traffic figures prepared by Colin Reeves. Our apologies but we do not have dates when these will be available nor do we have sight of the remit underpinning the traffic survey or how the data might be interpolated. SAVE Dunchurch do wish to emphasise though the point made at the examination that it is the scope - in strategic road network terms, the parameters of the model and its robust testing - that is so critical in informing sustainable planning decisions.
3. Just released (subsequently to the South West Rugby day's proceedings) are WCC Highways formal response to the DB Symmetry application. The findings wholly reinforce the points raised by SAVE Dunchurch to the Inspector in written statements, the examination days and 1 & 2 above. We believe them to be a crucial and material consideration not only in relation to the A45/A4429/M45 junction and the Dunchurch and Thurlaston communities but to the strategic transport planning that underpins RBC's Local Plan because WCC's objections: cite adverse effects on the Rugby gyratory; local roads out to Princethorpe; the Dunchurch crossroads; the need for and programme for opening of the south west spine and crucially that this development is "on its own is isolated and would be a car dominated development". Cumulatively, these objections reinforce the concern's of SAVE Dunchurch and the community because, in our view and as further evidence materialises, they reveal the very same shortcomings of the area wide transport infrastructure planning that underpins Rugby's Local Plan.

It's greatly appreciated that it seems the Inspector is now minded to accept the subsequent but pertinent email communications from SAVE Dunchurch. We would very much welcome the Inspector therefore considers thoroughly the content of these emails especially since:

- SAVE Dunchurch have had no reply from WCC in respect of questions raised on vibration, noise and pollution in Dunchurch (letters sent 21st & 30th Dec 2017);
- we maintain that due diligence by RBC has not been followed in relation to adequately explaining or engaging local communities on inter-related (strategic) planning policies that directly affect local peoples lives and,
- because there is a strongly held view, (which is being reinforced as cumulative impacts and new information material to the Plan come to light) that there is merit in rethinking some fundamental aspects of the Plan to achieve sustainable and healthy growth.

kind regards

Steve Fancourt (local resident and on behalf of SAVE Dunchurch)

Dear Mr Fancourt

In January the inspector was offered the results of a traffic survey by Dunchurch Parish Council.
He now asks:

Please could you enquire of Mr Fancourt whether the traffic count figures included in his email are that survey and if not when the survey results will be available.

Kind regards

Carmel

Carmel Edwards
Programme Officer

From: Steve Fancourt [REDACTED]
Sent: 31 January 2018 23:20
To: Programme Officer
Cc: MELVYN MACARTNEY; Michael Judge; Carol Seager; Ann Wright; Wise Technics Limited; Joe Garthwaite Tennis; Mary Cook; Patricia Judge; John D Bennett; Julian Woolley; Richard Allanach; Colin Reeves
Subject: Re: Rugby Borough Local Plan Examination Stage 1 Hearings

Dear Carmel

At Tuesday's hearing the Inspector made it very clear that any other questions or points for clarification outside of the hearing must be drawn to his attention via your office and not direct to himself.

Please will you bring the following issues to the Inspector's attention?

Although they were discussed as individual points the cumulative shortcomings they highlight in the Plan only became clear as the session came to a close.

SAVE Dunchurch consider they go to the heart of the Plan in terms of: the interrelationship of the proposed allocations; the cohesiveness of the Transport Strategy; alternative options for both explored in the plans evolution and crucially their questionability in terms of the NPPF test of sustainability.

These shortcomings centre on the transport strategy considered for the south west of Rugby and Dunchurch crossroads but by direct association then questions the sustainability of Lodge Farm, the South West SUE, DB Symmetry and the strategic 'fit' of the Homestead spine road. Although the Examination must look at each discreetly (on each day) they are all inter-related. But, it is the view of SAVE Dunchurch that the planning for this southern part of the Plan has not been adequately resolved. The modelling is flawed and alternative options if they exist have neither been fully explored nor consulted on with the local community.

Save Dunchurch don't believe WCC (VM) have adequately modelled the true local and strategic transport situation. Their assumptions are not listed. 20 replications fall short of providing enough confidence for the period of the Plan. Queuing is a non-linear and stochastic phenomenon.

Southbound journeys from Dunchurch

It's judged that private car journeys using the Dunchurch crossroads to travel southbound on the A426 in the a.m. peak and the return journeys northbound in the p.m. peak have not been adequately modelled. It was evident that the modelling was highly questionable for car journeys 'exiting' the model on the A426 and the B4429 and equally 'returning' to the model from the south. The model overlooked the existing 'at capacity' situation from the southward journeys let alone properly forecasting future increased usage of the A426 adding in Lodge Farm and SW SUE. The current hourly rates for the A426, based on the most recent traffic count data for the morning rush are:

	Straight on	from A45 Cov	from A45 Dav	Total
A426 Nwnd	246	235	188	668
A426 Swnd	272	56	18	346

As a comparison, the equivalent 'total' figure for the B4429 Westbound is about 380. This shows as a baseline (2017) there is already a major problem.

Tuesday's evidence exposed the gaps in the planning not just in responding to a long standing logistical bottleneck but also the dubious future decision making relating to the surrounding planned growth. It showed also that a comprehensive plan for Dunchurch is still absent and a joined up approach to transport and land allocation planning has been overlooked by WCC and RBC in their over emphasis on the Homestead spine road planned more, it appears, to unlock greenfield development than form part of an integrated, sustainable plan for this area.

The A45/M45/B4429 junction

It's requested that this 'node' in the transport framework should be fully modelled in detail with well-defined sensitivity testing. It is too late to do it after the Plan is approved. WCC (VM) haven't

explored fully how many vehicle movements will enter Dunchurch or openly predicted the effect on West bound arrivals at Dunchurch crossroads.

It was not evidenced how many of these journeys from Lodge Farm will join the M45? Assuming 50% this adds more than 1/3 to the current flow at the A45 junction (source DoT statistics) which will also be under pressure from at least 1000/hr now using the B4429, an extra 120 trucks/hr entering "Symmetry Park", 180/hr leaving, plus 2100/hr private vehicles also leaving warehouse site.

Further evidence from Tuesday's Examination proceedings, raising questions of the robustness of these parts of the Local Plan and tests of sustainability include:

- The Homestead spine road only mitigates 1/3rd of the transport problem affecting Dunchurch crossroads, not forgetting extended, adverse effects along its four highway approaches along with its geographical and heritage constraints,
- The journeys heading out of the VM model have not properly been tracked back into the model as p.m. flows especially from the A426 but also the B4429 from Daventry
- RBC / WCC have not addressed the growing deleterious effects (independent of the Local Plan) from journeys south from Dunchurch. No option has been forthcoming for a by-pass to address this. The community have not been given the opportunity to engage in transport options that might secure benefits arising from a by-pass around the south east of Dunchurch. (Logistically it is felt that this can only go east because of Draycote Water located to the west)
- It was ascertained that RBC have not applied to the DfT for the recently announced by-pass funding and not explored any cost / benefit analysis of a south east by pass in any plans or modelling that was disclosed at the examination,
- Interestingly, there is validity in the idea that a south-east by pass could readily provide access to the Lodge Farm development and allow traffic movements from that development to journey east – if an extension was then made from the A45 up to Ashlawn Road – and journey west to access the Rugby Western Relief Road, Coventry and Rugby town centre via the existing M45 / A45 junction. This would be without loading the Dunchurch crossroads. This also would avoid rat running of cars via Grandborough to get to the A426, the M40, Jaguar LandRover at Gaydon (all traffic generators VM claimed were in the transport model)
- The David Locke Associates report not released by RBC before the Final Draft states the Dunchurch crossroads are at capacity and an offsite solution is the only sustainable solution
- RBC in conjunction with WCC have guided the SW SUE Consortium and Lodge Farm developers to be wholly focussed on releasing greenfield development at the oversight of fully integrated sustainable planning for the south and south west of Rugby,
- Extraordinarily, RBC had asked the Lodge Farm developers to contribute to the Homestead link but no planned policies or mechanisms exist in the plan to address traffic from Lodge Farm having to come through the crossroads to get to the Homestead spine road, or to the A426
It's the view of Save Dunchurch that cumulatively, the combination of the above points, expose the paucity of robust strategic planning. It is evident that opportunities for betterment through fully integrated transport, environmental and land allocation are absent from the Plan as it responds to the village of Dunchurch, the community and its wider connections.

You are sincerely requested to give these points your careful consideration and Save Dunchurch demand the local authorities prioritise these issues, do the proper investigations and consult with the community on: firstly avoiding adverse effects, secondly alternative options that are explored and finally proposed mitigation once the first two approaches have been addressed.

Thanking you in anticipation of a careful consideration.

With best regards,

Steve Fancourt

On Wed, Jan 31, 2018 at 12:25 PM, MELVYN MACARTNEY

████████████████████ wrote:

Day 4 - South West Rugby

Good morning Carmel, at yesterday's hearing the Inspector made it very clear that any other questions or points for clarification outside of the hearing must be drawn to his attention via your office and not direct to himself.

Please will you bring the following pollution issues to the Inspector's attention.

We discussed air quality at the Dunchurch Cross Roads in great detail, especially Nox emissions and the required National and EU standards. During my statement I mentioned to the Inspector that pollution was much more than air quality and he agreed to come back to this issue, but due to time pressure we did not get the opportunity to discuss further in any detail. We request further consideration by yourself and evidence of mitigation from Warwickshire County Council and Rugby Borough Council on the following pollution issues:

1. Light pollution from the proposed developments, to consider residents and wildlife as it is known that bats and other nocturnal creatures are in the proposed development area.
2. Noise pollution from current traffic levels and anticipated increased levels of traffic and in particular heavy goods vehicles, especially on the four roads leading to the Dunchurch Cross Roads. Have any measurements been taken or modelling been completed and what is the proposed mitigation?
3. Vibration arising from current traffic levels and anticipated traffic increase, in particular heavy goods vehicles, especially on the four roads leading to the Dunchurch Cross Roads. As stated at the hearing, Dunchurch has an abundance of Grade 11* and Grade 11 listed buildings, a Scheduled Ancient Monument, the Lord John Scott Montague Scott Statue and other important medieval and conservation needs. Many of the listed buildings are residential and the residents have raised important concerns on the effect of vibration on their properties. We already know that our Statue, mentioned earlier is cracked and showing signs of significant stress. I have sent emails to Warwickshire County Council on the 21st and 30th December 2017, asking if any vibration data was available and have received nothing but silence. I guess this answers the question and they are hoping this issue can be papered over. Our Action Group, believes the residents of Dunchurch deserve better consideration.

You are sincerely requested to give these points your careful consideration and demand the the local authorities prioritise these issues, do the proper investigations and consult with the community on any proposed mitigation.

Thanking you in anticipation of a careful consideration.

Please note these points were raised by Save Dunchurch (a Medieval Village) Action Group in their final presentation to this hearing submitted to your Programme Officer on the 5th January 2018.

With best regards,
Melvyn J Macartney