

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

27th June 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, the supporting information and additional information in response to the Highway Authority letter dated the 21st March 2018, the Highway Authority maintains 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.

Access by Sustainable Modes:

The Highway Authority maintains that the proposed development is located in a unsustainable location for residential development, which will lead to a car dominated development. The justification for this decision is set out below;

Pedestrian Provision:

The Highway Authority is not satisfied that journeys can be completed in a sustainable manner especially in regards to walking. Whilst it is acknowledged that the Binley Woods Primary School is located just within 500m of the development, any parents with children must first cross the A428 Rugby Road, which has 40 mph at this location.

The Highway Authority is unsure whether Binley Woods Primary School has sufficient provision to accommodate children from the proposed development. In this case the nearest alternative schools are over 2km away within Coventry, on the otherside of the A46. In these cases this journeys will be undertaken in the car.

In terms of retail provision there is one small retail unit within Binley Woods approximately 1km from the development site. All other retail provision is located within Coventry over 2km away from the development.

Whilst, it is acknowledged in paragraph 5.9 of the further additional information, that the applicants officer a financial contribution towards to the provision of a pedestrian crossing. However the Highway Authority would require such infrastructure to be provided as part of the access works for the development. Therefore the Highway Authority requires the provision of a drawing to demonstrate that pedestrian crossing could be accommodated within proximity to the development and on a desirable route for pedestrians.

However, even with the provision of a pedestrian crossing there is a significant lack of services within a walkable distance the Highway Authority therefore contests how the development can be sustainable, and a safe walking route be identified without sufficient infrastructure to support and make such journeys viable alternatives to car based trips.

Cycling Provision:

The Highway Authority does not consider that cycling is a viable mode at present to and from the development site. The core reason being that the A428 is a busy road with a high vehicle flow and varying speeds. The Cycle Officer also notes a significant number of accidents which have occurred along the corridor which have involved cyclists.

Whilst the Highway Authority acknowledges more seasoned cyclists could cycle on the carriageway, novice cyclists would require off-carriageway provision. However the existing footway provision is insufficient towards Coventry to support both cyclists and pedestrians. However there is limited employment and retail destinations within a suitable distance and a reliance on Coventry.

Public Transport Provision:

The Highway Authority disputes the applicants Transport Consultants comments regarding bus service provision in the additional information submitted. The 86 service does operate on a 30 minute frequency between the hours of 09:50 and 15:50 for services routing between Coventry and Rugby, and between the hours of 09:31 and 15:01 in the opposite direction. There is no consistent service in either the AM or PM peaks and no evening service after 20:00.

In regards to the Saturday bus service, the service operates on a 30 minute frequency between the hours of 08:20 and 15:50 for services routing between Coventry and Rugby, and between the hours of 09:31 and 15:01 in the opposite direction. There is no consistent service in either the AM or PM peaks and no evening service after 21:00 from Coventry.

Sunday provision is limited with the service operating in each direction every two hours between the hours of 08:00 and 17:00.

The Highway Authority considers that the existing bus service is not sufficient to support the development, notably during the AM and PM peak periods, which are the core times for residents to access work. It is therefore concluded that the bus service does not provide an adequate alternative to car based journeys.

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 maintains its objection 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.

Yours Sincerely

Ben Simm

Ben Simm
Development Group

CC –

FOR INFORMATION ONLY
Councillor Timms – Earl Craven