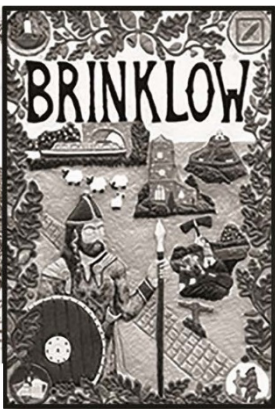




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AND ITS RESIDENTS"



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BRINKLOW PARISH COUNCIL

This response to the planning application R23/1027 for the development by Fraser Group of the land between Ansty and junction 2 of the M6 was commissioned by:

Brinklow Parish Council

Supported by the Parish Councils of:---

Monks Kirby

Pailton

Ansty

Wolvey

We hope that this document will be formally accepted as our joint first response.

John Reid

Chairman Brinklow Parish Council

Objections made on behalf of Brinklow Parish Council

To Rugby Borough Council

re planning application R23/1027

for development of employment led headquarters campus development including offices,
warehousing retail and leisure and associated site contouring and landscaping

At land at Crowner Fields Farm and Home Farm, Hinckley Road,
Ansty, Warwickshire CV7 9JA

From Jennifer Lampert BA(Hons) Dip TP M.R.T.P.I

Jennifer Lampert Associates Ltd

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Exmouth EX8 2JB,

Devon

August 2024

Further to the notification from Rugby Borough council dated 8th July 2024 in relation to the above planning application we wish to lodge strenuous objections to this planning application on the following grounds.

As you will note from the front page these objections are made not only on behalf of Brinklow Parish Council but also Pailton, Monks Kirby, Ansty and Wolvey Parish Councils.

The application is a major application and includes an environmental statement and other specialist reports. These proposals are in our view likely to cause significant environmental effects not just during construction but ongoing throughout its operation. We do not consider that such intensity of overall effects can be successfully mitigated or prevented by monitoring measures.

The development is of major significance to the area being only 100m to the south west of the village of Ansty and extending to 112.9 hectares of undeveloped agricultural fields located within green belt and designated open countryside in the Rugby Borough Local Plan adopted in June 2019.

This proposal will have an enormous detrimental effect on the local parish at Ansty as well as on the surrounding parishes including Brinklow Parish Council and our neighbours listed above.

Our objections are set out under the following headings:

National Planning Policy Framework (NPPF)

Rugby Borough Local Plan 2019 (RBLP)

Brinklow Neighbourhood Plan December 2022

Comments on the Environment Impact Assessment (EIA) including environmental impact, landscape and visual impact, traffic generation and light pollution and air quality.

National Planning Policy Framework (NPPF)

The primary planning context for consideration of any planning application is set by the National Planning Policy Framework (NPPF) revised in September 2023 which advises in

paragraph 2 that applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise.

Paragraphs 7 and 8 state that the purpose of the planning system is to contribute to the achievement of sustainable development which comprises 3 overarching objectives, economic, social and environmental. These objectives are interdependent and need to be pursued in mutually supportive ways.

Paragraph 9 reinforces the need for sustainable solutions that respect these three objectives but also that takes local circumstances into account to reflect the character, needs and opportunities of each area.

It is our view that to develop this site for a major business enterprise is seeking to meet the economic objective of the NPPF but it does so whilst causing severe harm to the social and environmental objectives and is therefore harmful to the local character of rural countryside which is also protected by being designated green belt.

Paragraph 111 reminds Councils to consider whether a development would impact on highway safety and whether the residual cumulative impacts on the road network would be severe. It is our view that the proposal will have a severe impact.

We remind the Council that paragraph 119 of the NPPF advises that whilst planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses this should also be “whilst safeguarding and improving the environment”

Chapter 13 relates to protecting green belt land and paragraph 138 identifies the five purposes of greenbelt which include: a) to check the unrestricted sprawl of large built up areas and this site is very close to the boundaries with Coventry, and at c) to assist in safeguarding the countryside from encroachment.

Paragraphs 147 states that inappropriate development is by definition harmful to the green belt and should not be approved except in very special circumstances.

Paragraph 149 advises local authorities that they should regard the construction of new buildings as inappropriate in the green belt and as stated under paragraph 148 that when considering any planning application the LPA should ensure that substantial weight is given to any harm to the green belt. This advice stresses that “very special circumstances” will not exist unless the potential harm to the green belt by reason of inappropriateness and any other harm resulting from the proposal is clearly outweighed by other considerations.

It is our strong view that very special circumstances are not proven in this case and there is no justification for the local authority to seek to grant this proposal or to act in contradiction to the advice contained under chapter 13 green belt provided in the NPPF.

We also draw attention to the guidance in the NPPF relating to conserving and enhancing the natural environment (chapter 15), by a) protecting and enhancing valued landscapes, d) minimising impacts on and providing net gains for biodiversity and e) preventing new development from contributing to unacceptable levels of soil, air, water or noise pollution.

Rugby Borough Local Plan (RBLP) 2019

In making these objections we have considered the adopted policies of the Rugby Borough Local Plan and in particular refer to the following:

We note that the spatial vision for Rugby in 2031 includes the intention that “development will be accommodated in ways which reduce our carbon footprint as well as protecting and enhancing the area”. The proposed development would not reduce the carbon footprint nor enhance the area and thus is contrary to that spatial vision.

Policy GP1 is aimed at securing sustainable development following the advice provided in the NPPF. As we have stated in that heading above the proposals whilst endeavouring to meet the economic objective would be harmful to the social and environmental objectives and therefore would be contrary to policy GP1.

Policy GP2 includes reference to Green Belt and advises that new development will be resisted. There are no very special circumstances that might be applied to the site that would overrule the national policy on Green Belt.

The proposals are contrary to policy ED3 employment development outside Rugby Urban Area where no employment development will be permitted outside the Rugby urban area unless the site has been allocated for employment use in the local plan. This site is not allocated in the local plan nor does it meet the criteria for small scale exceptions as set out in that policy.

The proposals would be contrary to Policy HS5 Traffic generation and air quality, noise and vibration. This policy seeks to ensure that any development will “minimise the impact on air quality, noise and vibration caused by traffic generation” and proposals should be located to optimise use of public transport, walking and cycling.

The siting of the proposed development is in a rural location with no safe pedestrian or cycling routes and no public transport. The large scale generates enormous levels of additional traffic both in cars and lorries that the existing road network is not designed to take.

The development would be contrary to policy NE1 protecting designated biodiversity and geodiversity assets. The scale of the buildings and infrastructure required to develop the site will be harmful to the biodiversity and have a harmful impact on local wildlife and other ecological habitats.

The development would be contrary to Policy NE3 Landscape Protection and enhancement the purpose of which is “to ensure that significant landscape features are protected and enhanced and that landscape design is a key component in the design of new development”. Proposals should positively contribute to landscape character. It is our view that a development of this size, scale and intensity would detract from the landscape and countryside character and not contribute to it in any positive way.

The location of this proposal is sensitive in landscape and ecological terms as the development is of such a vast scale that it would be seen as an urban extension to Coventry contrary to both national and local policies.

Policy D1 Transport provides guidance for delivery of development using sustainable modes of transport and includes measures designed to mitigate transport impacts on the local network. However this policy is designed and directed to advise development that is already allocated in the Local Plan or is of such a small scale that is also supported by other policies of the Local Plan. It is our view that the current proposal falls outside these definitions and therefore is contrary to policy D1.

We note that a Transport Assessment has been submitted as part of the details of the application and have made some additional comments separately in the sections below.

Brinklow Neighbourhood Plan December 2022

On 14th December 2022 Rugby Borough Council, after a successful referendum was held in Brinklow Parish on 15th November 2022, agreed that the Neighbourhood Plan for Brinklow was “duly made” and now forms part of the Development Plan for Rugby Borough.

Within that plan is an aim to improve road traffic, pedestrian and cyclist safety and to pursue traffic calming and reduction in traffic measures as wider developments increase pressure.

It is our view that the proposed application presents harm to these aims as it is of such a significant scale with a major increase in traffic flows that in no way results in traffic calming nor offers any physical measures that might achieve a reduction in the impact on the existing road network and community.

The Brinklow Neighbourhood Plan is a statutory document and its aims and intentions should be supported and be reflected in subsequent planning decisions made by Rugby Borough Council. Any decision should especially have regard to the aims and intentions of our neighbourhood plan to reduce pressure on the extant road network by increase traffic calming and taking additional measures to ensure that any new developments do not increase the traffic generation and bring harmful effect to the village and on the community.

Comments on the Environmental Impact Assessment (EIA):

Environmental Impact

The site is located in open countryside, is in agricultural use and designated as Green Belt Land. The land is crossed by three public rights of way with one having a connection to the Oxford Canal Walk. The topography slopes moderately from north west to south east and the landscape is visible from existing roads and fields as well as the canal. It is highly visible from its surrounds.

It is not designated in the adopted Rugby Local Plan for any future development and it is protected from development by the green belt and countryside policies of that plan as described in the above sections.

In view of the scale of the proposals and the large extent of new buildings and their variety of uses, major provision of infrastructure and the extensive remodelling of the landscape the environmental impact is huge and its effects cannot be disguised or mitigated to a sufficient scale that could justify a permission.

We have considered the details provided in the environmental statement but do not consider that there is sufficient evidence to support the scheme or to justify that such a major exception should be made to the lawfully adopted Rugby Local Plan and the advice in the NPPF.

Landscape and Visual Impact

The application includes a Landscape and Visual Impact Assessment (LVIA)

The north east part of the site is designated as a Local Wildlife site and there is an area of broadleaved woodland which is a priority habitat of approximately 2.6 hectares in the south east and south of the site.

It also lies within the Princethorpe Biodiversity Opportunity Expansion Area which aims to protect corridors for the movement of wildlife and protection of flora and fauna. These areas are described in Policy NE2 Strategic Green and Blue Infrastructure in the Rugby Borough Local Plan(RBLP). New developments must provide suitable green and blue infrastructure corridors that link to adjacent corridors.

As referenced previously policy NE3 (RBLP) landscape protection and enhancement is to ensure that significant landscape features are protected and enhanced.

It is our view that the proposed development will not protect or enhance the existing landscape and biodiversity features but will destroy those features to the detriment of the countryside. The scheme will have a significant impact on the countryside to the detriment of the character and appearance of the area and we do not consider that there are any works that could be undertaken that would provide sufficient mitigation to allow the scheme.

Traffic Generation

The northern carriageway of the M6 is adjacent to the southern boundary of the site and M69 motorway runs parallel to the eastern boundary with access to the site being obtained via the B4065 from junction 2 of the M6. From this relationship we are concerned that the site will attract a high volume of traffic that is completely unsuited to the local road network and not appropriate to the minor road B4065 and the rest of the rural network.

The application is for a high intensity use for employment led headquarters, other campus style businesses including research and development along with warehouse and distribution

units. The scheme also includes leisure, food and beverage and other retail outlets and a hotel and learning and development academy. All of these uses will generate a high volume of traffic which is totally unsuited to this location and surroundings.

Within the environmental statement there is a detailed section on traffic issues which clearly shows how intense the traffic generation will be with the development and the effect on the surrounding network. For example from the tables provided we note that the increase in traffic and peak hours on the B4065 would be an increase of 577%.

There are no safe solutions for pedestrians or cyclists to travel to and from the site and this combined with the overall increase in road traffic of cars and more especially lorries of all sizes makes the scheme unsustainable and should be refused.

Light Pollution

The proposal is for a large amount of buildings and internal access roads and car and lorry parking. All these areas bring with them the need for external security lighting as well as the requirements of the buildings themselves. This will bring a high intensity of light pollution to existing countryside that currently has a reasonable level of dark sky.

Air Quality

It is our view that a development of this scale and especially with the intensity of movement of vehicles involved will have a detrimental effect on air quality over and above the current environment. The effect will be of such a magnitude that it will generate large levels of poor air quality which should not be allowed to happen.

It is nonsense for the developer to suggest that because the site is currently not within an Air Quality Management Area (AQMA) then an assessment regarding air quality is not necessary. We completely agree that as the current use of the land is countryside and agricultural use it is not included within any AQMA but if the proposed development is built it is our view that there would be a large and harmful effect on air quality. In view of the nature of the proposals we urge that one of the reasons for refusal includes concerns over air quality.

In conclusion on behalf of the Parish Councils listed at the beginning of this representation we urge that the planning application R23/1027 is refused for the reasons that have been outlined above.

Jennifer Lampert BA(Hons), Dip TP M.R.T.P.I.