

DUNCHURCH PARISH COUNCIL

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11th April 2018

Rugby Borough Local Plan Examination

Matters, Issues and Questions for Stage 2 Hearings

We have general observations we would like considered plus we would like to speak on:

Matter 10 Healthy, Safe and Inclusive Communities

Issue 10d Traffic Generation and Air Quality [Policy HS5]

Matter 12 – Sustainable Design and Construction [Policies SDC1 – SDC9]

Issue 12 c Historic Environment [Policy SDC3]

Matter 13 Delivery [policies D1-D5]

Issue 13a Transport [Policy D1]

General Observations

The Parish Council has a number of general observations with regard to Matter 6 – Housing Policies.

The Parish Council is of the opinion that the soundness of the Local Plan has not been proved and we maintain our original stance that the Strategic Housing Market Assessment [SHMA] is not fit for purpose in as much that the document was prepared by G. L. Hearn at the same time as they were acting as agents for the Cawston Extension site consortium for a development of 600 properties.

In the opinion of this Parish Council and indeed a significant number of Dunchurch residents the SHMA is not independent and is seriously defective. It is obvious that not all sides of the argument have been considered and that only those with an interest in growth appear to have been consulted.

The study fails to adequately explore economic issues e.g. affordable housing, commuting and immigration. We are also aware that RBC seems to have been very selective about which neighbouring authorities it has consulted with.

The terms of reference for the SHMA appear impartial however, we understand, the email traffic between the local authorities and G L Hearn released under the Freedom of Information Act would indicate there was some manoeuvring behind the scenes.

G L Hearn have treated Objectively Assessed Need [OAN] on population and household projections as forecasts which, of course, they are not. By adopting this approach, the SHMA fails to consider how the factors which lay behind the projections may change. In reality changes in social trends and public policy are likely to be far more influential.

The SHMA is based upon the assumption that new dwellings will meet existing and future housing needs; however, this seems unlikely as with the exception of starter homes, the great majority of new dwellings are bought by existing home owners trading up. Therefore, the market is not effective in ensuring that newly arising housing needs are met.

The study rightly explores a very wide range of scenarios in its attempts to quantify OAN and comes up with a figure that should be built in Coventry and Warwickshire unfortunately there is no sound theory to back up the figure. The local authorities in their so-called Memorandum of Understanding have taken an approach which is directly at odds with this policy and decided, without satisfactory explanation to increase the housing target figure.

The Strategic Employment Land Study has not been subjected to detailed analysis. The employment prospects for Coventry are overstated and this is consistent with the entire OAN giving a very over optimistic view of the economic prospects for Coventry and Warwickshire. There are also concerns regarding commuting the ratios between jobs and people, commuting patterns change. The objectives should be to reduce commuting wherever possible.

The Parish Council has concerns that the relationship between affordable housing and overall housing need is not convincingly demonstrated by the study. Affordable housing should not be an 'add-on' to overall need, so the upwards adjustment of the OAN to take account of affordability appears unfounded. It is also open to question whether 'affordable housing' is affordable to many new households.

We feel the SHMA is a flawed document in many areas and certainly feel it should be resubmitted by a Company that is independent and not involved as Agents for a developer seeking to build a significant number of properties within the Borough.

Government guidance requires the Council to demonstrate the deliverability of the plan. The RBC have considered whether it is realistic to expect 12,400 dwellings to be built in Rugby between 2011 and 2031 but their conclusions are profoundly unconvincing for a number of reasons.

If the rate of development seen in the first four years of the plan 2011 to 2015 were to continue through to 2031 only approximately 6800 dwellings would be completed, to meet the targets in the plan the build rate would need to increase significantly.

While we are told Rugby has 9,787 dwellings with planning permission, only 5,565 are expected to be delivered by 2031 so allocating more sites is likely to reduce the take-up rate still further. Over-allocation on this scale would effectively destroy the planning strategy because the Council would surrender control to house builders.

Following cuts to capital grant and financial restrictions on councils, we now rely on private developers to deliver a large share of new affordable homes through the Section 106 system. But since 2012, national planning rules have blunted this tool by enabling the widespread use and abuse of viability assessments.

Developers can use viability assessments to argue that building affordable homes could reduce their profits below competitive levels, which they define as around 20%. This gives them a legal right to cut their affordable housing quota.

We feel the SHMS is a flawed document in many areas and certainly feel it should be resubmitted by a Company that is independent and not involved as Agents for a developer seeking to build a significant number of properties within the Borough.

The Rugby Plan gives no explanation of why Coventry cannot meet more of its OAN, or how the allocation of the excess to other authorities has been decided. There is no evidence of Green Belt, environmental or policy constraints being considered just a comment that 'whilst there are constraints present within Rugby Borough, these constraints do not significantly limit the ability of the Council to find sufficient land to meet the housing target'.

RBC have been struggling to demonstrate a five-year supply of land for housing. Logic would indicate that existing planning permissions should be counted as part of this five-year supply. Instead the Council are looking to increase their housing provision in an attempt to address the alleged shortfall.

National and regional studies indicate the factor limiting house building numbers is almost certainly due to the sharp decline in public sector house building; there seems almost no prospect of an upturn in this sector. Private sector building has been around 90,000 dwellings per annum nationally since 2008 however housing permissions have exceeded this figure by 50,000 per annum annually.

With a much larger number of planning permissions granted than dwellings built, developers will inevitably choose to develop the sites that will provide the greatest potential profit and this will come from green field sites rather than brownfield sites. The Sustainability Appraisal indicates that the number of brownfield sites being considered for housing within Rugby Borough is negligible. Rugby Borough Council, rather than enforcing planning permissions already granted to the north of Rugby are bowing to commercial pressures to release land to the south of the Borough where potential take-up is more likely. The infrastructure in this area is already struggling to cope with increased traffic.

The housing proposals in the Rugby Local Plan are unsustainable and contrary to key elements of government policy. These policies do not consider the detrimental effect on the quality of life of existing residents in Dunchurch Parish the level of infrastructure planning is minimal and totally unacceptable they are therefore unsound.

Rugby Borough Council has a duty of care to all residents within the Borough. Unfortunately, it is becoming increasingly obvious that Dunchurch together with other villages are being sacrificed to provide an easy option for development on the part of the Borough Council and a cash cow for developers. Finally, we need to make it clear this Parish Council does not consider the relationship between Rugby Borough Council and G L Hearn impartial. Again, we feel a SHMA should be demanded that is impartial.

Matter 7 Economic Development Policies

7b Other Development Policies [Policies ED2 to ED4]

The Parish Council are keen to encourage employment opportunities within the local area however, we are disappointed, but not surprised, that Rugby Borough Council are yet again taking the easy option for the proposed development on employment land north of Coventry Road Thurlaston by considering a logistics development, in other words a further plethora of sheds and HGV/LGV's loading and unloading 24/7. Reading the proposals it is also clear that the applicant has chosen to ignore any facts that are inconvenient including completely ignoring the fact that a significant number of vehicles using the facility would use the B4429 to come and go through the centre of Dunchurch further exacerbating our existing traffic problems.

The Parish Council would like to have confirmation that RBC are in fact pursuing opportunities to Provide the sustainable growth and expansion of all types of business and enterprise in rural areas.

Matter 10 Healthy, Safe and Inclusive Communities

Issue 10c Open Space and Recreation [Policy HS4]

The Parish Council would like to point out that Rugby Borough Council [Policy LP43 the Open Space, Playing Pitch and Sports Facilities] cannot be considered fit for purpose as its major focus is the urban area not the rural areas. As a Parish Council we have witnessed that funding obtained from developers building within Dunchurch Parish for improvement of play areas and sports facilities have been diverted to other areas of the Borough. Very convenient for RBC but not used in the spirit of Section 106 contributions which is to benefit the area affected by the development.

We would like to see the policy amended to ensure that developer contributions cannot be diverted by RBC for their convenience and are used to improve facilities and benefit the area affected by the development.

Matter 12 – Sustainable Design & Construction

Issue 12f Water Environment and Supply

The Parish Council has reservations as to the supply of adequate water and waste water treatment facilities to deal with the requirements of housing and industrial needs of the proposed future developments. The Parish Council would urge RBC to carry out investigations urgently.

We would like to speak on the following matters:

Matter 10 Healthy, Safe and Inclusive Communities

Issue 10d Traffic Generation and Air Quality [Policy HS5]

The policy not consistent with national policy with regards to Air Quality Management Areas. The current NPPF policy states that: "Para 124: Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan." In addition, Paragraph 120 advises planning policies and decisions should ensure that a "development is appropriate for its location", and that, "the effects... of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or Application Proposals to adverse effects from pollution, should be taken into account."

The Parish Council has serious concerns regarding the commitment of RBC to addressing existing and future air quality issues – see document below. It is imperative that the policy reflects NPPF guidelines especially when you consider the results of the Parish Council's recent traffic survey showed that current daily queues of traffic southbound on Rugby Road are averaging 120 vehicles in peak hours. What are the resultant levels of pollution within this highly built-up area of Dunchurch from idling traffic.

See extract from Annual Air Quality Monitoring and Management below – in particular item 3

1 September 2017

AGENDA MANAGEMENT SHEET

<i>Name of Meeting</i>	Whittle Overview and Scrutiny Committee
<i>Date of Meeting</i>	11 September 2017
<i>Report Title</i>	
<i>Ward Relevance</i>	Air Quality Monitoring and Management – Annual Update All
<i>Contact Officer</i>	David Burrows, Regulatory Services Manager, Tel: 01788 533806

Summary	The Regulatory Services Manager will attend the meeting to provide an update on air quality monitoring by the Council.
Financial Implications	There are no financial implications arising from this report at present. There are risks associated with future developments where a decision to object or not object may be challenged. The council could also be challenged on its action plan.
Risk Management Implications	There are risk management implications arising from this report as detailed in the Financial Implications.
Environmental Implications	Air quality monitoring and management delivers environmental and public health benefits.
Legal Implications	The Council is required to review and assess air quality under the Environment Act 1995.
Equality and Diversity	No new or existing policy or procedure has been recommended.

Agenda No 5

Public Report to the Whittle Overview and Scrutiny Committee 11 September 2017 Air Quality Monitoring and Management – Annual Update

Summary
The Regulatory Services Manager will attend the meeting to provide an update on air quality monitoring by the Council.

1. BACKGROUND

The Committee has an ongoing role in scrutinising air quality monitoring reports and management arrangements. The Regulatory Services Manager will attend the meeting to update the Committee on:

- The Council's latest statutory Air Quality Annual Status Report
- Progress made on the Local Air Quality Management Action Plan Annual Status Report
- Implications of new residential and infrastructure developments planned in the borough

The council has launched a public consultation on its 2017 Air Quality Annual Status Report and Air Quality Action Plan Annual Status Report and submitted a report to the Department for Environment, Food and Rural Affairs (Defra) for review and

approval. The full document is available via the following link

https://www.rugby.gov.uk/info/20021/pollution/349/2017_air_quality_annual_status_report_public_consultation

2. ANNUAL STATUS REPORT

This report provides an overview of air quality in the Rugby Borough during 2016. It fulfils the requirements of Local Air Quality Management (LAQM) as set out in Part IV of the Environment Act (1995) and the new relevant Policy and Technical Guidance documents for 2017 issued by Defra.

The LAQM process places an obligation on Rugby Borough Council to regularly review and assess air quality, and to determine whether or not the air quality objectives are likely to be achieved within the Borough. Where an exceedance is considered likely, Rugby Borough Council must declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures put in place in pursuit of the objectives. This Annual Status Report (ASR), before 2015 titled a Progress Report, is an annual requirement showing the strategies employed by Rugby Borough Council to improve air quality and any progress that has been made. The report is submitted to Defra for appraisal and approval. However, an ASR is not required when an Updating and Screening Assessment (USA) report is stipulated which is required every 3 years (next submission scheduled for 2018).

2.1 PM_{2.5}

A fundamental difference in the ASR compared with previously titled Progress Reports is a requirement by Defra to report on PM_{2.5} (particulate matter with an aerodynamic diameter of 2.5 µm or less). RBC is expected to work towards reducing emissions and/or concentrations of PM_{2.5}.

RBC is therefore working closely in partnership with Public Health Coventry (Coventry City Council) and Public Health Warwickshire (Warwickshire County Council) to combat PM_{2.5} and has established the joint Arden Health Protection Committee. Included in the members are the Environmental Health managers in Warwickshire and Coventry comprising representatives from Public Health England, NHS, Public Health Coventry, Public Health Warwickshire and local authority Environmental Protection/Health officers.

RBC is currently assisting in developing a new Health Protection Strategy with an action plan, which will include actions to improve air quality under an Air Quality Alliance.

The Air Quality Alliance will provide a multi-professional partnership forum for the sharing of ideas and evidence-based practice related to reducing the negative health and environmental impacts of poor air quality, and to identify opportunities for collaboration.

2.2 Annual Status Report Findings

During 2016, the annual mean NO₂ objective was exceeded at five diffusion tube locations (S10, S24, W1, W3 and AD1). Site S10 located near the Webb Ellis Pub on Corporation Street and S24 in Dunchurch Square are the only two diffusion tube sites to have consistently exceeded the air quality objective, year on year, since 2013. Both sites are both positioned within the existing AQMA and are considered locations of relevant exposure. At both locations, although the annual mean NO₂ concentration remained above the national air quality objective in 2016, a decrease in NO₂ concentration was observed relative to 2015, putting an end to the gradual upward trend in NO₂ concentrations that had been measured at site S10 since 2012 and at S24 since 2014.

At sites W1 and W2, both located at the roadside of the Warwick Street gyratory system near the centre of town within the existing AQMA, concentrations of 47.4µg/m³ and 45.5µg/m³ were measured. The major improvement works to the gyratory system, part of the AQAP, were completed in May 2015. Therefore, 2016 was the first year where it was possible to assess whether changes to the road layout has had the intended impact of decreasing the impact of traffic on the town centre, in particular the annual mean NO₂ concentration. At site W2 and W3, a small decrease in annual mean NO₂ concentrations were recorded during 2016, however at site W1 an increase of similar magnitude was observed. Therefore, it is too early to determine the impact that the improvements to the gyratory system have had on air quality in the town centre and it is therefore recommended that monitoring is continued at the Warwick Street locations (W1 – W3).

As well as the four sites located within the current AQMA, site AD1, which was commissioned in March 2016, on Church Road in Shilton indicated an annual mean NO₂ concentration of 47.1µg/m³, after annualisation. The result is lower than the 60 µg/m³ threshold that would indicate the possibility of an exceedance of the NO₂ hourly objective and as the site is a kerbside location (within 1m of road) the result is not considered of particular concern. Continued monitoring at this location is recommended to determine whether the NO₂ concentration on Church Road is significant and needs to be acted upon.

On the basis of these results, with four sites within the current AQMA exceeding the annual mean NO₂ objective, there is no justification for amendment of the currently declared Rugby AQMA.

Rugby Borough Council does not currently operate any automatic monitoring stations for PM₁₀ that are equipped with reference method analysers. Prior to June 2012 Rugby Borough Council operated an extensive network of automatic monitoring stations measuring PM₁₀ concentrations throughout

the Borough. Following several years of monitored PM10 concentrations being well below the relevant air quality objectives, these monitoring stations were decommissioned.

No new significant sources have been identified that could give rise to air quality issues in the Borough.

The main priorities for addressing air quality set out by Rugby Borough Council are:

- Maintain existing AQMA declaration for NO2.
- Continue to monitor NO2 concentrations at existing long-term locations, and supplement these with additional sites at pollution hotspots and narrow roads to gain better understanding of spatial variation of pollutant concentrations.

In addition, the key high-priority measures listed in the draft Air Quality Action Plan to be addressed in the coming year include:

- Public awareness campaigns for active travel – the promotion of walking and cycling, and in particular at schools and workplaces. Coventry and Warwickshire Air Quality Alliance are starting a 12 month campaign on Active Transport starting in August 2017. It will cover Coventry and Warwickshire and will involve apps and a website. The aim is to encourage more active and sustainable ways of transport, e.g. cycle routes, car sharing, and integration of public transport. Its success will be monitored via use of the apps and website.
- Greater provision of cycle infrastructure to encourage greater uptake of cycling
- Road improvement works to remove bottlenecks and alleviate congestion
- Green procurement for promotion of low emission transport, and vehicle fleet efficiency improvements.

One of the key challenges to improving air quality in Rugby is predominantly in the form of planning applications for developments that may impact negatively on existing air quality, as is the case for most local authorities. There have been several recently completed major developments in Rugby, along with a considerable number of large-scale developments in the pipeline and numerous smaller developments.

The most significant planning applications are listed below:

- A new secondary school development at Rokeby Estate, Rugby.
- Cotton Park East – Anticipated submission for up to 855 dwellings.
- Gala & Cemex House, Evreux Way – Outline application for redevelopment of the site for up to 7040 m².
- Mill Road (former ALBA Site) – Mixed use development including offices, employment and 29 residential houses with 103 apartments.

- Land to the North of Ashlawn Road – Now approved following an appeal decision for proposed development of up to 1,000 dwellings and associated school Planning Inspectorate APP/E3715/W/16/3147448.
- Lodge Farm Development – New settlement comprising of up to 1,500 dwellings, potential extra care provision, a new Local Centre, employment, education and open space. Currently outlined in new Local Plan, which is currently being considered by the Secretary of State.
- Urban Expansion South West of Rugby – Up to 5,000 residential dwellings with associated infrastructure comprising of link road, health/community services facilities, employment zone. Local Centres and Schools. Allocation of this site is outlined in the new Local Plan, which is currently being considered by the Secretary of State.

The following developments are either under construction or are completed / occupied:

- Rugby Radio Station (SUE) – Urban extension to Rugby providing up to 6,200 dwellings, up to 130,000 M² of space for various land uses, including mixed use district centres, 3 primary schools and 1 senior school. Phase 2 is currently under construction.
- Rugby Gateway (Eden Park) – Outline application for up to 1,300 residential units and employment zone. Phase I and the employment zone has been completed. Phase II (230 dwellings) is pending.
- Leicester Road/ Technology Drive – Permission granted for 635 dwellings, with all but phase 4 being constructed.
- Elliot's Retail Park (Phase I) – 27,000 m² retail development now fully constructed and occupied.
- Elliots Retail Park (Phase II) – bulky goods Retail Park under construction.
- Junction 1 Retail Park – 5,670 m² retail park completed and partly occupied.
- Coton House (R12/1353) – Hybrid application of 76 residential properties - construction nearing completion.
- Cawston Extension – Up to 600 plus homes. First phases are started to be constructed.

Environment and Public Realm will compile and submit an Updating and Screening Assessment and Air Quality Action Plan Status Report in 2018.

3. PRIORITY JUNCTIONS

The continued development of the town is causing issues with air quality and especially at the two key sites where exceedances are occurring which are the Warwick Street Gyratory and Dunchurch crossroads.

This is becoming an increasing problem for planning applications where not only do they contribute to an increasing levels of pollution at these junctions but objectors are using air quality as a major reason for objecting, and expecting support from the council's air quality officers, which is often not possible due to government guidelines.

The council is under a government directive to provide more housing and employment. The town layout means that these will continue to be problem junctions unless action is taken, e.g. relief roads, or they reach capacity.

The Warwick Street gyratory, in particular, is necessary for traffic north-south and east-west in the town, and for customers and employees to be able to get to the town centre to ensure a vibrant town centre.

However, it is clear the Warwick Street Gyratory remains a significant issue arising from the convergence of flows at the Gyratory within central Rugby. This is compounded by 'street canyon' areas that create poor dispersion of pollutants. Analysis of the junction has indicated that there is little more that can be done to improve the junction.

This creates a problem for future growth requirements in Rugby. Despite the recent improvements to the Gyratory, the NO₂ annual mean air quality objective is still likely to be breached for future years. This indicates that the proposed bypass and distributor links are unlikely to provide sufficient relief to the Gyratory from traffic approaching the junction from either the north or the south. This location is likely to remain a traffic pinch point. Concentrating on improvements to arms to the Gyratory to reduce congestion or provide alternative to the Gyratory is now a new focus.

For Dunchurch improvements will be made following the approval of the Ashlawn Road housing development, but the improvements will not be sufficient for further developments. The proposed action is the Southwest Broad Location Bypass and link roads. While this requires funding from developments and will take several years to deliver, it is the best option for the long-term reduction of air pollution in Dunchurch until low and ultra-low emissions become the dominant vehicles.

The Southwest Broad Location Bypass and link roads compliment proposed junction improvements at the Dunchurch Crossroads, while also providing a significant contribution to mitigation capacity to accommodate Rugby Borough Council's future growth needs.

Government guidance is vague and requires the council to build more homes and employment, but also balance this with air quality. While air quality is now a national issue following action by ClientEarth, practical guidance about how a town can develop to meet government targets and still meet air quality targets has not been published.

The council has not been identified by the government as requiring a statutory Clean Air Zone, which are being applied to the cities with the highest pollution.

The new West Midlands Combined Authority also has the authority to impose AQMAs and action plans. We are aware that this is currently being considered by the mayor of the WMCA but has not progressed significantly.

Road infrastructure improvements are principally determined by WCC Highways. However collaborative work is continuing and any future developments will be reported in 2018.

Matter 12 – Sustainable Design and Construction [Policies SDC1 – SDC9]

Issue 12 c Historic Environment [Policy SDC3]

The Parish Council does not consider the policy SDC3 is in line with NPPF section 12 paragraphs 132 and 133 see below.

132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

133. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: ● the nature of the heritage asset prevents all reasonable uses of the site; and ● no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and ● conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and ● the harm or loss is outweighed by the benefit of bringing the site back into use.

The Parish Council would urge RBC to amend Policy SDC3 to accurately reflect the current NPPF guidelines and also to urgently undertake a Conservation Area Appraisal for Dunchurch to reflect current and future implications for the Conservation Area the appraisal should also include the impact of increased traffic flows through the Conservation Area.

Matter 13 Delivery [policies D1-D5]

Issue 13a Transport [Policy D1]

“Dunchurch Parish Councils’ (DPC) comments and observations to the report by Vectos in response to Rugby Wide Area Paramics Model and to the Dunchurch Calibration Count Comparison dated 26/3/2018.

Observation:

The report details in great detail justification by Vectos in the use of their model with particular regard to traffic modelling data. They seek to prove that their model is 'fit for purpose'. DPC have no complaint or professional comment with regard to the choice of model used by Vectos.

Vectos seek to indirectly 'discredit' the DPC survey undertaken in January/February as not compliant with Government guidelines on 'neutral' months. These neutral months from Government are only advisory. Most transport modellers take into consideration 'real world demand' for road space.

Comments:

The GEH formula used to calculate traffic demand is accepted. The fitness for purpose of their model is not disputed.

However, whilst Vectos compare their data input favourably with the data collected by the DPC traffic survey they do not emphasise a very important factor i.e. that demand for road space outside of the recognised peak periods has increased significantly since 2016. Simplistically, demand for traffic movements at the junction have increased overall from 15000 movements per day to over 17000 and an additional 2000+ moves through the Adkinson Avenue. The Adkinson Avenue traffic movements were effectively ignored by the Vectos report.

Rugby Borough Council and Vectos do not comment on the Dun Cow junction's capacity to handle the levels of traffic. These traffic levels are significant and, as indicated by Vectos, were modelled before even the Ashlawn Road planning approval was passed. This development has not started to date. It must therefore be assumed that the demand on the junction will be further increased despite the 'temporary relief road' which will only serve traffic heading for Coventry or the M54/A45 and not traffic heading for Daventry or Southam/Banbury.

Do Rugby Borough Council consider that current daily queues of traffic southbound on Rugby Road averaging 120 vehicles in peak hours is acceptable? What are the resultant levels of pollution within this highly built-up area of Dunchurch from idling traffic?

Dunchurch Parish Council consider that Rugby Borough Council undertake that 'real world' view of traffic movements through the village and given due consideration to levels of traffic transiting from Rugby to Banbury and the M40 and from Rugby/Southam towards Daventry. There is currently no other route than through the centre of Dunchurch."

On behalf of Dunchurch Parish Council.

April 2018