



Thurlaston Parish Council
Thurlaston
Rugby

5th January 2023

Lucy Davison (Posted by email to lucy.davison@rugby.gov.uk)
Development Team
Rugby Borough Council
Town Hall
Rugby
CV21 2RR

Dear Lucy,

Re: Planning Applications R22/1275
Draycote Hotel, Coventry Road, Thurlaston, CV23 9LF
Extension to hotel and golf club – replacement club house, meeting/conference rooms,
additional car parking provision

Thank you for your invitation, dated 8th December 2022, to review the above planning application.

Thurlaston Parish Council's (TPC) Planning Subcommittee has assessed the planning application and this letter is our response to the proposed developments on the Draycote Hotel and Golf Club site.

TPC notes that the applicant has had a pre-planning meeting with RBC and that a number of relevant RBC planning policies have been identified and expected to be given consideration within the applicant's supporting documentation. Pre-planning engagement is commended.

We note is that the application will likely be taken within the sui generis category. This will likely provide planning flexibility regarding the multi-use of such a commercial development which has several business facets. TPC has limited knowledge of sui generis planning applications or RBC's interpretation of the same as a local planning authority. However the principal use of the land and facilities will be broadly as now, albeit the scope and scale of the enterprise will be considerably larger – in essence it amounts to a new build. In principle we support the proposed development; however we identify aspects of the proposals which require particular scrutiny, most notably compliance with RBC's Local Plan and the NPPF. Consideration if given to:

- Sustainability
- Highways
- Environmental – visual and noise pollution

Sustainability

Sustainability appraisal encapsulates the social, economic and environmental effects of a plan to ensure it reflects sustainable development objectives. The applicant has considered several aspects

of sustainability – transport modalities, protection of wildlife, Rugby’s travel plan, various RBC Local Policies and NPPF.

National policy requires that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

The applicant cites compliance with the provisions of NPPF (2021) but fails to provide any evidence in support of the requirements of para 112 and 113, which state development proposals should:

- give priority first to pedestrian and cycle movements;
- encourage public transport use;
- address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- minimises conflicts between pedestrians, cyclists and vehicles;
- allows for the efficient delivery of goods, and access by service and emergency vehicles.

Reference to the applicant’s Transport Statement section 3 records non-compliance:

- 3.1.1 *The are no existing footways within the vicinity of the site.*
- 3.1.2 *There are no dedicated public rights of way path adjacent or within the site.*
- 3.1.3 *There are no dedicated cycling facilities within the vicinity of the site.*
- 3.2.1 *There are no bus stops located near the proposed development site. The nearest bus stop is located at Coventry Road (B4429) some 1 mile away from the proposed development.*

However the applicant’s Planning Statement declares:

- 4.24 *The site benefits from a significant access on to the A45 which affords the development site a significant level of accessibility. From the outset, the Applicant has engaged with their highways consultant to ensure that any impacts are understood and addressed. From a recreational standpoint there are footpath links to the south which adjoins with Draycote Water. In terms of technical requirements, this submission is supported by a transport statement which should be read in conjunction with the wider suite of application documents.*

The proposed major expansion of the commercial enterprise and the potential increase of employees and visitors must be given consideration in line with national and local policies. The extant site access is ‘challenging’ to any visitors other than by motor vehicle - there is no safe pedestrian space along the shoulder of the A45, there are no cycle and pedestrian routes near to the site boundary, there are no public transport services. However on the north side of the A45 there are very large scale dwelling developments – it is not unreasonable to assume that potential employees and visitors would expect there to be safe pedestrian and cycle access. This is a fundamental requirement of local and national policies. It is a major plank for the creation of low carbon sustainable travel.

Previous nearby planning application assessments undertaken by TPC have sought to use major planning developments as opportunities to improve neighbourhood low carbon pathways/corridors. TPC has proposed that dialogue should be encouraged to link the NCN Route 40 between Cawston, Dunchurch, Thurlaston, Frankton and Birdingbury. The applicant’s proposed development site runs alongside the extant disused railway route and therefore in-line with parts of NCN Route 40. Whilst proposals have been recognised, currently funding has not been secured such as by use of S106/CIL

agreements, national or WCC grants. Regrettably developers have largely made proposals as limited silo developments with little recognition of holistic opportunities to support Rugby's Corporate Strategy 2021-2024 Outcome 1.

A modicum of development could be undertaken to facilitate the remodelling pedestrian and cycle routes to provide extended congruent links with those on the north side of the SRN. Ideally the local planning authority is probably best equipped to facilitate such collaboration.

Highways

The applicant has stated that there will not be any material overall road capacity issues. Based on average traffic movement data and its extrapolation this may be the conclusion. We request evidence that the TRICS database provides valid evidence for the nature of the proposed development.

TPC considers there is an important consideration concerning vehicle bunching and stacking of inbound traffic to the site, especially at times when formal organised events such as weddings and sporting fixtures are programmed. The applicant proposes an additional 145 parking spaces. The A45 is a 60 mph zone; we note National Highways (formally Highways England) required changes to road layouts to the Tritax Symmetry warehouse complex to mitigate the risks on the A45 of obstructions and therefore traffic hazards. No evidence has been presented that similar considerations have been made. For example, mitigation of the risks of an acute 90° access entrance design could be remodelled as part of a SRN slipway. Ideally highway remodelling should be undertaken which, inter alia, incorporates sustainability requirements raised in the previous section.

Environmental – visual and noise pollution

Overall the scheme is considered a positive development, especially apt given the significant population growth expected in the borough as a consequence of RBC's Local Plan and the demise of Dunchurch Park Hotel.

A particular concern is that associated with events that may require music and firework/drone displays. Both have the potential to be a nuisance to immediate neighbours (dwellings and farms) and local villages of Thurlaston, Cawston, Frankton and Dunchurch. We seek conditions to ensure events will be appropriately policed and only allowed to proceed within set limits.

Summary

TPC's recommendation is that planning approval should be granted subject to the requirements lodged in this report. These are:

- **Sustainability** – provide satisfactory non-vehicular access to the site in compliance with the NPPF (2021).

We propose a holistic approach should be undertaken to ensure pedestrian and cycle routes are modelled so that connection corridors are provided congruent with developments on the north side of the SRN. There are potential opportunities for a modicum of development to achieve such aims.

- **Highways** - the proposed unsatisfactory site access from the A45 SRN should be resolved so that potential hazards of vehicle bunching are mitigated.
- **Environmental – visual and noise pollution** - conditions should be applied to ensure massing events (eg. weddings, sports fixtures, conferences) will be appropriately policed to ensure noise and light pollution may only proceed within set limits.

We respectfully request that you acknowledge our representations and respond to them accordingly and allow us to consider further the proposals when more information is submitted. In the meantime we would be grateful if you would keep us informed of any new information supplied by the Applicant.

Yours sincerely,

Dr Keith Boardman
Chairman Planning Subcommittee
Thurlaston Parish Council