



Rugby Friends of the Earth
Response to Rugby Radio Station (mast site) Consultation
[Ref: Outline Planning Application R11/0699 RUGBY RADIO STATION]

Rugby Friends of the Earth is a local group that is passionate about creating a thriving world for everyone. That means a healthy natural environment, a fair economy and a world where everyone's needs are met, now and long term.

Our concerns include Nature and Ecosystem security; Fair and planned transition; Land use, Food and Water Security; Economics and Resource Use; Climate and Energy Security

Rugby Friends of the Earth raise a holding OBJECTION to the proposed development. Although we have not yet prepared our full response, at this stage we OBJECT to the proposed development for the following reasons:

Our response to this consultation not only outlines our concerns about certain aspects of the application, including lack of ambition in a supposedly "Sustainable Urban Extension to Rugby", but also suggests solutions towards truly sustainable development.

Nature and Ecosystem security:

Biodiversity, wildlife, habitats and natural environment

CONCERN 1: Although the BT Rugby Radio Station mast site has been regarded technically as "brown field" it is in reality very green and extremely significant in terms of biodiversity, both along the canal and also in the "unimproved" grass land where the mast towers were located. The aim should always be to minimise destruction of Rugby's wildlife, habitats and trees.

RECOMMEND 1: There need to be urban wildlife corridors and management action plans to support and promote the protection of wildlife. High-grade agricultural land should also be protected. The corridors should also link with the wider Warwickshire and Northamptonshire countryside.

CONCERN 2: The emphasis should be on extending and enhancing habitats whilst adding to the variety of accessible green spaces in the borough. There is semi-improved grassland, rush pasture and ponds as well as water-courses. However, despite earlier reassurances to the contrary, it is now proposed that there will be development along the





Canal Corridor in areas that are highly valued by the local community, canal users and other visitors for their significant natural beauty, visual amenity and tranquillity.

STRONGLY OPPOSE 2: It is necessary to strongly object to the present development proposals for these areas because of the detrimental effect they will have on biodiversity including rare and important wildlife and their habitats such as nesting sites. The recent UK National Ecosystem Assessment (NEA) report highlights the benefits the natural environment provides to society and continuing economic prosperity and its implications on long term planning developments.

RECOMMEND 2: There should be tree planting and more use of trees for passive shading. Trees will also help improve air quality and help absorb CO2 emissions.

CONCERN 3: It appears that the biodiversity survey data is out of date, poor and inadequate and it is a scandal that Warwickshire Wildlife Trust has found difficulty in getting access to the site and to the data. We understand that the species there include bats, curlew, grass snake and great crested newt.

RECOMMEND 3: An analysis and review of the existing ecology study must be carried out urgently by an independent, locally and nationally recognised body, such as Warwickshire Wildlife Trust and this should be enabled by allowing them early access to the site for their own surveys of the biodiversity before there is any approval of the application. A study of the loss of ecologically recognised farmland should also be carried out.

Fair and planned transition:

Wellbeing services, Housing, Public access and Green spaces

CONCERN 4: The aim for this development should always be to avoid over-intensification and the emphasis should be on developing local skills to successfully manage the transition to a low-carbon and resource-efficient economy.

There should be early provision of essential services within the site such as local shops to meet day-to-day needs including selling food and local produce. Where is the schedule of when the essential services such as schools, shops, medical centres, and public transport will be put in place?

RECOMMEND 4: There should be an independent group established as soon as possible, drawn from a wide range of community groups across the borough, and funded to meet regularly to contribute to detailed planning. It should be able to draw on past experiences in order to champion and advise on local shops and other services within the site to ensure that these are provided in the early stages of the development. New residents should be invited to join the group as they come into the site and the group should make efforts to transfer knowledge to them. This group should be empowered to establish such things as an annual event on the site and be given facilities such as noticeboards, a funded website and a suitable 'shop-front' for its activities. This group should also be given every





encouragement to rise to meet the challenges surrounding the severance effect of the A5 and assisting neighbouring people in rural areas so that the whole community may reap the rewards of developing support that delivers a diverse range of effective employment to them all, close to their homes.

CONCERN 5: The development should not allow the future creation of gated areas that contribute little to the community in general but simply add value to the real estate for the pleasure of a few. There should be universal access to health, faith, recreational and safeguarding facilities. There are proposed developments on the north bank of the canal both by The Locks and along Moors Lane, but it is not clear whether the proposals include plans for a marina or other moorings for canal boats. The proposed access point for these exclusive parts of the site are isolated from the main body of the development. The developer should not work without being fully open and transparent about the true facts about the public rights of way and access, now and in the future.

STRONGLY OPPOSE 5: It is necessary to strongly object to proposals to develop parts of the canal corridor for the exclusive use of a limited number of new residents. Public amenity and access will be significantly restricted due to the proposed exclusive residential development in this location.

RECOMMEND 5: Every opportunity should be explored to foster a variety of competitive and sustainable local businesses that support community sustainability and deliver a wide and thriving range of cost-effective employment for residents, particularly the youth within the community, but this should not be at the expense of restricting access to, or damaging, the variety of green spaces in the borough. Every opportunity should also be explored to provide and protect green space that allows youth and children to access and learn to enjoy the outdoor spaces. Solutions should include facilities such as MUGAs (Multi Use Games Areas), which allow for a variety of sports and games to be played within a small footprint. All the cycle routes should be of a suitable quality for frequent use in all weathers, built to last and made of appropriate construction and materials that do not detract from the green spaces they pass through.

Public & low-impact Transport (as alternatives to private motor vehicles)

CONCERN 6: There are no signs of any attempt to follow the high-level sustainability principle to "achieve a best practice modal shift to low impact forms of transport".

What has happened to the plans for a dedicated public transport route?

RECOMMEND 6: A development of this size requires a guided bus, or other dedicated public transport route, between the site, the railway station and the town that supports and encourages the use of additional public transport around the town. The use of appropriate and possibly innovative public transport could help to ease the likely traffic congestion which will otherwise result from the additional vehicles using existing roads into Rugby. For the application to be approved it should demonstrate that the developer is working towards





a truly sustainable transport system; including by the writing up of a 'Residential Transport Plan' with

(a) sustained and improved bus access, services and facilities that will provide the new residents and other visitors to the site with a serious alternative to dependence on the private car. Low-impact routes should be designed to run past the shops, schools and other public amenities. Public transport should be designed to safely stop at these places and bus turning circles are also important. Routes should not unfairly favour the exclusive residential exclaves against the the other housing hubs; and

(b) an aim to use modern information systems to help reduce perceived barriers and thus combat this dependence. These might include such things as reliable information and Real Time Information Screens (on bus stops, in homes on fridge doors or breakfast tables in residents' kitchens, at workplaces and in public buildings) on whether the buses, trams and trains are running late, what the weather forecast is, and feeds from local CCTV cameras of traffic congestion in the area; and

(c) initiatives asking residents to look at their travel and consider low-impact transport, cycling or walking as alternatives to private motor vehicles. Cycle routes should be contiguous and not just a series of isolated stretches of cycleways that do not interconnect with each other. There should be joined up cycle access to amenities and each of the schools.

These forward-thinking facilities should enable the accompanying restriction of provision for on-road car parking, other than recharging bays for electric visitors' and service vehicles. Parking in residential areas creates a negative effect on the local environment, especially if it is overspill from the sites of employment. The sustainable aspects of the 'Residential Transport Plan' should also enable the building of only the minimum number of private garages required within the regulations. These and other Sustainable Travel aspects will also need to target the employment sites to discourage parking and help achieve a realistic modal shift. This will make the site more attractive to potential settlers and will improve the quality of life both for the new residents of the site and for existing residents of Rugby.

CONCERN 7: Where is the green travel plan? There should be much better plans for good pedestrian access that enables the public to benefit from the amenity at all times of day. These should aim to make every effort to facilitate DIRFT and office workers in walking from their houses on the mast site in preference to encouraging workers to drive in form further afield.

RECOMMEND 7: Plans should favour alternatives to private motor vehicles through the provision of secure cycle parking spaces on the cycle routes at all amenities, secure cycle storage for every home and the creation of pedestrianised areas where pedestrians, cyclists and service vehicles have priority over private motor vehicles, particularly in the neighbourhood of the schools. Road traffic is a significant health threat, so a sustainable transport and travel plan would support healthy lifestyles by keeping the health risks from road traffic to an absolute minimum; not only in terms of safety of public spaces and





pollution from traffic emissions but also related benefits in take up of healthier alternative activities. Any green travel plan should be both monitored and backed up with penalties.

CONCERN 8: There is a significant lack of ambition in provision for cycle routes, such as between the homes, the railway station, the town centre and other developments. Sustrans have a proposed route through the site for leisure cycling from Rugby to Kettering, but how is this now affected by such a huge development on either side of the A5? There should be much better plans for a contiguous network of safe, direct and attractive high-quality green routes for cycles within the site that supports a network of additional cycle routes around the town and the rest of the borough.

RECOMMEND 8: Cycling should be treated as a serious alternative to the use of private motor cars. Parts of the canal corridor, and south of it, could be improved (using appropriate construction and materials) to make them a network of safe off-road cycle paths and pedestrian walkways, particularly south of the proposed link-road corridor and also in preference to the development that is proposed along the canal. There is also a possibility that these could link into other pedestrian access routes, for instance the Linnel Road Nature Reserve pathway to provide a network of more direct and less hilly cycle routes under the railway from the mast site to Rugby Town Centre (such as via Winfield Park or Butlin Road); and also where people can ride their bikes to Rugby Railway Station without encountering as many hills. We understand that British Waterways Board support similar proposals.

A significant financial contribution is required to support the provision of services and infrastructure towards the upgrading of the existing urban cycle routes and also to make the proposed development acceptable for cyclists heading to work at DIRFT.

People will also travel 'in the other direction', from Rugby Town to work at DIRFT and an important consideration is to reduce the severance effect of the A5 cutting right through the middle of the combined site. The proposed east/west Route 53 proposed by Sustrans would connect the existing Sustrans National Routes 50 and 41, which both run north/south. It would cross over the A5 into Northamptonshire and run through Lilbourne and Yelvertoft where it would meet and cross Route 50. There should be much better plans indicating steps to minimise the severance effect of Watling Street (the A5) and its traffic, particularly for pedestrians and cyclists. The development should be able to attract significant Rural Development Programme for England (RDPE) funding for cycle routes to work (over or under the A5), both as support for people in rural areas to travel sustainably and cost-effectively to the new employment that will arise within the residential site and for residents of the mast site to cycle to sustainable rural businesses in neighbouring rural communities.

Traffic Reduction and distribution of Transport connections

CONCERN 9: The only link to the town centre proposed for this development, is a single all-mode main road running through the centre of the site. This simplistic 'all your eggs in one basket' approach would build in a single point of failure and gives rise to a number of





other concerns as set out below.

STRONGLY OPPOSE 9: It is necessary to strongly object to the building of the proposed link road until a full study has been made of motorway junctions and traffic developments existing in that locality.

RECOMMEND 9: A comprehensive and fundamental re-think is required!

CONCERN 10: What are the projected traffic forecasts for the existing roads around the proposed development? This proposed through route will end abruptly near Butlers Leap putting stress on to poor quality 'B' roads, which have not been included in any improvement or upgrading scheme. In terms of access to Rugby's established Town Centre, the proposed routes will put the traffic generated by this scheme into serious conflict with existing urban traffic and add to a greater threat from traffic along safer routes to schools.

RECOMMEND 10: Greater consideration should be given to not providing only a single link for all modes of transport. There should be much better plans indicating steps to avoid taking over the existing public highways with many more motor vehicles and a significant financial contribution is required towards the upgrading of these existing urban routes. There should also be traffic calming measures in Clifton.

CONCERN 11: What is the likely effect of all the extra traffic on air quality in the borough? Acceptable levels of nitrogen dioxide (NO₂) are already being exceeded on a number of major roads in Rugby. We have serious concerns regarding the air quality impact. The very large increase in traffic flows as a result of the construction of the new roads and interchanges will lead to worsening of the air quality, such as at Butlers Leap or wherever the proposed all-vehicle link feeds into the existing road network. If the link road is given the go-ahead, a large increase in traffic and congestion will take place on Clifton Road, yet this is already the worst hit part of the Air Quality Management Area (AQMA) in Rugby, particularly where it reaches the Town at Church Street. How will air quality objectives ever be met or pollutant levels be brought down again once the new routes have been built?

RECOMMEND 11: There needs to be monitoring now and on an ongoing basis of air quality on the existing roads that would form part of the proposed key routes to and from the site, including in particular on Clifton Road. There should also be much better plans indicating steps to ensure that air quality objectives will be met and to ensure the avoidance of any increases in key pollutant levels during the ongoing development and after the establishment of the site. The increase in road haulage from the DIRFT extensions will also exacerbate air quality. A significant financial contribution is required towards measures to proactively address these issues on the affected existing urban routes

CONCERN 12: What is the programme for the construction of new roads and interchanges relative to the phasing of the development's construction?





(a) Any link roads would of course have to join onto the existing road network somewhere, but we DO NOT SUPPORT the suggestion for a junction at Vicarage Hill as this route does the least to encourage a link between the site and Rugby Town Centre, yet is likely to cause considerable environmental damage to the area of land along the former railway track.

(b) It might reduce stress on existing infrastructure if the connections were to be distributed at several points. However, insufficient consideration seems to have been given to the likely effect of the junction between the main link road and Hillmorton Lane. This will allow vehicles to drive northwards towards Clifton and also southwards to Lower Hillmorton Road via The Kent and possibly also on to Hillmorton Road. Buses cannot pass under the railway bridge to The Kent. These routes are unsuitable for large volumes of traffic without extensive improvement of the present carriageway alignment and road pavement design. However, there are other ways to avoid overloading the surrounding roads that should be considered.

(c) What plans are there, if any, for building an extra train station for passengers nearer the site?

RECOMMEND 12: There needs to be some public transport solution to lighten the traffic stress. A new train halt on the Northampton Loop is not likely to be as practical as a guided-bus or super-tram solution, but it would be better to have all of these instead of the proposed link road. If the link road goes ahead then serious consideration should also be given to the use of the latest technology to enable the link road to operate as an efficient modern-day toll road. This could be done quite practically as part of a 'congestion charge' scheme for the site as a whole.

CONCERN 13: What are the projected traffic forecasts within the proposed development? Through traffic wishing to access the main arterial routes and the motorways, should reach the A5 corridor (Watling Street) without going through the centre of the residential development. There should be good emergency access via as many routes as practical and emergency vehicles should not be impeded.

RECOMMEND 13: With the exception of emergency vehicles, buses and other public transport, there should be weight and width restrictions applied to through traffic to deter larger vehicles from using these residential routes. The hub around the 'C' Building should be an area where pedestrians, cyclists and service vehicles have priority over private motor vehicles and there should also be other pedestrianised zones particularly in the neighbourhood of the schools. There is great opportunity for the use of 20mph zones and other traffic calming measures, Serious consideration should be given to provision of facilities to encourage car-sharing, including pick-up and set-down points and dedicated parking spaces for members of bona-fide car-sharing schemes. The design of the residential area and housing should incorporate tough standards that favour appropriately-sized local 'corner shops' against the incursion of stores reliant on many car-parking spaces to bring in car-borne custom from further afield; and standards that facilitate low-carbon deliveries. With such large warehouses nearby there should be no need for





residents to travel to off-site superstores.

CONCERN 14: There is no cohesion between the existing and the proposed new traffic infrastructure. The increase in traffic will adversely affect the neighbouring rural areas and should be directed away from narrow rural roads around vulnerable areas such as Clifton.

RECOMMEND 14: There should be a more fundamental review of transport and highway links and their safety. Such a review should incorporate projected traffic flows on all roads and other forms of transport links throughout the area, including the A5, M1, A428 Hillmorton Road, Lower Hillmorton Road, Ashlawn Road, M45/A45, A4071 Rugby Western Relief Road (RWRR), A426 Leicester Road, M6, Boughton Road, B5414. Also flows on other primary routes into Rugby and possible additional routes which may be required to ensure Rugby and the Rugby Radio Station development are viable once the development on both sides of Watling Street begins and to proof them against future changes. Also flows on the West Coast Main Line and Northampton loop. There should be attempts to reduce the numbers and impact of HGVs on the A5 so close to so many homes. Increased trans-shipment via rail should be strongly encouraged to destinations within the region.

Land use, Food and Water Security:

Food, Resource-use and Waste Reduction

CONCERN 15: There is not enough room in the residential gardens to grow food, yet the provision of well-placed allotments could support use of locally sourced real food which has reduced packaging requirements.

RECOMMEND 15: There should be better provision of allotments or equivalent, where residents can grow Real Food locally. The plans for a sustainable urban farm are welcome. There should be provision to sell this locally produced Real Food locally and other facilities to encourage respect for the food chain and community sustainability. There should be better visibility and more evidence of commitment to this in the plans.

CONCERN 16: The use of local skills for a low-carbon and resource-efficient economy should be encouraged much more strongly. What is to happen to all the copper which was put in the ground to form one huge ground plane for the radio transmissions and to the extensive sub-surface cabling?

RECOMMEND 16: There should be a commitment from the developer that all materials used in construction are, wherever possible, sourced locally to support the local economy and reduce carbon emissions. Building materials should be selected from recycled options and more sustainable greener alternatives. The use of local skills for the raising of local Climate Change awareness should be particularly encouraged. There should also be much better plans for local sourcing of resources, including local food. The site has historically had a high water-table and this water should be used to good effect as a resource within the site. Every opportunity should be explored to foster a thriving network





of competitive and sustainable local rural businesses and to support community sustainability in the neighbouring rural communities.

Economics and Resource Use:

Waste Reduction & Re-use

CONCERN 17: There is little evidence of plans for the prioritisation of waste reduction and recycling. These should be much better. The "district centre" at the site's hub, and any individual community centres within the settlement, should address the social, environmental and economic aspects of sustainability that lead to a cleaner community "to complement Rugby's Town Centre".

RECOMMEND 17: There should be provision of a central re-use 'shop', or community resource exchange, and recycling centre, complete with a training facility in which residents should also be asked to consider their waste. The design of both residential and commercial areas should include provision for maximising community reuse, grey water use, composting and recycling rates to reduce impact both locally and globally. Green designs should prevail and traditional building and reuse should be encouraged where environmental standards can be maintained or raised.

Perhaps of greatest concern are industry-related environmental issues. The DIRFT site might be a good place to locate a mechanical biological treatment (MBT) facility. However, plans for waste management should not include incineration nor suggest that 'Energy from Waste' (EfW) is a sustainable source of power as destroying reusable or recyclable resources is not and never will be green. People should be trained locally so that they not only build these new buildings and gardens to the highest standards of environmental sustainability, but can then also use the skills learnt to avoid the knocking down of buildings but instead sensitively bring existing local buildings and grounds up to modern standards of environmental sustainability.

Climate and Energy Security:

Energy Conservation and Climate Change adaptation

CONCERN 18: Will the buildings be built to achieve zero-carbon standards? The alignment of houses to be in the optimum orientation for south-facing solar gain is welcome. However, the plans for saving energy in the new homes and schools are not ambitious enough. Would it not be practical and cost-effective to design in a Heat Grid into the streets right from the start across the whole site so that the houses don't need individual boilers? This should make them slightly cheaper to build (and buy), and potentially a lot cheaper to run.

RECOMMEND 18: Not only should homes be built to be energy-efficient to the highest





degree currently available, particularly in the social-housing to counter future Fuel Poverty in households, but district heating and cooling should be forefront in the plans for schools and other community buildings and consideration also given to whether the nearby massive warehouses could be used as heat-sinks across the other half of this development straddling Watling Street. With Climate Change, cooling is becoming an increasing part of the energy mix yet the efficiency of cooling is not only woeful currently but is unlikely to improve quickly as it is actually difficult to do with less use of energy. There should be appropriately-sited provision of environmentally-friendly services such as nappy re-use schemes (e.g. siting of a nappy laundry near a source of waste heat).

The most environmentally-friendly and energy-efficient design standards should be followed that rise to the challenge of providing more efficient heating and more efficient cooling in order to conserve energy and reduce emissions significantly across the site. A significant proportion of homes should be built to the rigorous Passivhaus (passive house) standard for energy-efficiency in a building. This design process results in ultra-low energy buildings that require little energy for space heating or cooling, thereby reducing their ecological footprint. Passivhaus also achieves excellent indoor air quality by reducing the air infiltration rates and supplying fresh air which is filtered and post-heated by a Mechanical Ventilation and Heat Recovery (MVHR) unit. Some residential Passivhaus buildings only need specify a heated towel rail as the means of conventional heating as this heat can then be recovered and circulated by the MVHR unit. Passivhaus is a robust and simple approach to building houses so that they have excellent thermal performance and exceptional airtightness with mechanical ventilation that allows the designer to minimise the heating demand of the building.

CONCERN 19: To help mitigate climate change globally every new development should be designed to help lower temperatures locally and thus globally. Infrastructure will also have to be designed for adaptation to Climate Change. It is much better to start with passive measures such as tree planting and the use of trees for passive shading.

RECOMMEND 19: increasing the albedo (reflectivity) of roads, footpaths and other sun-facing surfaces as this can help lower temperatures and thus slow warming globally. Furthermore as Climate Change takes effect temperatures will get hotter and photochemical smogs will increase, so strategically planting trees and increasing the albedo of roofs, as well as the walls, of many buildings can avoid them using more electricity for cooling. Addressing hotspots will not only lower temperatures locally but will also save power that would otherwise be used for cooling in the site and thus reduce our town's CO₂ emissions. Buildings with high solar reflectivity last longer than dark coloured structures which are subjected to greater daily extremes of expansion and contraction; and buildings with low emissivity also use less energy for heating.

Renewable and Sustainable Energy Provision

CONCERN 20: The original intention to provide renewable energy provision on site has been diminished and there is no firm commitment to provide locally produced decentralised energy sources. The developer is missing the opportunity to attract significant





community benefit funding for the new and existing communities from such schemes.

RECOMMEND 20: There should be much better plans for renewable energy in line with the opportunity for aggregation and economies of scale offered by such a large scale development coupled with the opportunity provided by local industry's expertise in this field. Combined Heat and Power (CHP) and cooling should be encouraged for buildings, particularly the larger ones. The 'C building' has a generator hall and massive diesel fuel bunker which if adapted to run on biomass and brought up to modern standards could possibly serve as the centre of plans for a biomass CHP heat grid and cooling scheme, where there is likely to be a huge heat and cooling demand within a reasonable distance of the CHP plant. However, a more modern CHP plant, potentially supplying the needs of the whole site could be built very close by as an embedded part of the developments in DIRFT and integrated efficiently and cost-effectively with the warehouses' requirements and facilities. Geothermal power should be seriously considered as a source of power for a large scale CHP district heat grid and cooling scheme.

NOTE 20: These plans should not include incineration nor suggest that 'Energy from Waste' (EfW) is a sustainable source of power as destroying reusable or recyclable resources is not and never will be green.

CONCERN 21: Studies have shown that around 80% of the population is in favour of wind energy and that at least about two-thirds of people would like to have a windfarm near them. The turbines in operation at DIRFT already prove that wind generation is feasible in the locality. Not only do Tesco clearly feel that there is public support for such thinking, but there are already a number of other plans for Large Wind farms approved nearby which will be in operation well before construction begins at the mast site; Yet Large Wind turbines have not been seriously considered for this development, with the result that the application has very very little in terms of renewable energy other than the unambitious aim of some buildings having solar panels.

RECOMMEND 21: All buildings should be equipped with or have access jointly to south-facing, or steerable, solar panels and these solar photo-voltaic and solar thermal arrays should be built in as part of the homes when building the houses; and similarly for Ground-Source Heat Pumps and their groundwork in the gardens or for groups of houses, if a geothermal power is not to be utilised site-wide. These should be designed to work in efficient and effective conjunction with any air-source heat pumps or Mechanical Ventilation and Heat Recovery (MVHR) units such as used in the Passivhaus houses. However, the aim should be to strive for net export of sustainable power from the site.

Land within the site should be provided for sustainable energy provision, such as large wind turbines particularly along the A5 corridor, as a necessary part of the infrastructure of the site, before residential dwellings become the dominant feature in this settlement. Tall structures are a historic feature of this landscape. Having already had twelve 820ft high masts on this site supporting plans for some wind turbines in a windfarm would be in keeping with its heritage.





Conclusion

Although we are really pleased the applicant has a desire for the development to be sustainable, given the potential offered by such an extensive development on the relatively blank canvas of this new site, we feel that the applicant has missed a considerable opportunity to develop a truly "Sustainable Urban Extension to Rugby".

- (a) No development should go ahead without proper studies (e.g. right across biodiversity, transport, waste, energy, skills, resource-use etc.) before there is any approval of the application. Given the potential effect that such an extensive development is likely to have on the surrounding existing settlements, including Rugby, there should be a more fundamental review of transport, highway links and projected traffic flows throughout the area, as indicated above. There has also been insufficient consideration of environmental matters relating to the protection of existing nature resources and the sourcing of energy requirements. A new ecological study is required as indicated above and more extensive use should be made of renewable energy resources. The lack of appropriate independent studies and presentation of their findings is extremely disappointing and very worrying at this outline level.

- (b) Inappropriate plans endanger health or worsen air quality. There should be much better plans with vastly improved energy efficiency, embedded energy saving measures and improved safety and attractiveness of the pedestrian environment. The developer should demonstrate that they are working with the councils towards a greener borough by assisting them in setting up a public register of existing open spaces within the borough and maintaining this throughout the development. This development provides an opportunity to deal with deficiencies in the organisation and design of transport links and environmental issues in and around Rugby. It is an opportunity which we as a community cannot afford to miss.

- (c) The application lacks vision and ambition for sustainable development, particularly in the field of communications (such as for community involvement in energy conservation and traffic reduction) considering that a major partner is BT; and also in its future-proofing (such as provision for adaptation to climate change, water resilience and measures to reduce fuel poverty in the era after peak-oil) considering that the other major partner is Aviva, an insurance company. There seems to be little evidence in the design, or in its phasing or scheduling, of any attempt to utilise what is already there to create, or at least mimic, an organic extension to the existing community of Rugby.

