

Representation Form for Local Plans



Local Plan Publication Stage Representation Form

Ref:

(For
official
use
only)

Name of the Local Plan to which this representation relates:

Rugby Borough Council Proposed
Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13th March 2026
By email to: localplan@rugby.gov.uk with **Proposed Submission Consultation in the subject line, OR by post to:** Development Strategy, Town Hall, Evreux Way, Rugby, CV21 2RR.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Helen"/>	<input type="text"/>
Last Name	<input type="text" value="Stewart"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value=""/>	<input type="text"/>
Address Line 1	<input type="text" value=""/>	<input type="text"/>
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E-mail Address (where relevant)	<input type="text" value=""/>	<input type="text"/>

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: Stretton on Dunsmore Parish Council

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	3, 81 & 348				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
(2) is Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Within the proposed Local Plan a number of location options have been considered and a mix of housing (some urban, some rural) have been proposed. The previous plan proposed urban extensions at Houlton and Cawston which have been slow to be developed. Additional urban extensions have been considered but ruled out on the basis that the background infrastructure costs are too significant for developers to engage with them. Instead, smaller rural allocations have been proposed in which it is assumed that local infrastructure will either accommodate, or can be uplifted to accommodate, the infrastructure need. In many cases this is baseless assumption. Many communities report that they are in dire straits with foul water treatment, potable water supply, highway overloading, community support facilities, NHS and education access. Emergency service response times are inevitably greater than urban areas.

Most of the rural communities with proposed developments are already in crisis and an assumption that facilities and infrastructure can be organically improved to handle the additional loads are not based on fact nor any consolidated survey data. Whilst residents are rightly concerned that the developments will go ahead and make a bad situation worse it is possible that some developments will acquire Development Requirements that the public utilities will not be able to fulfil and therefore the allocations become undeliverable.

The plan is short term and does not build on the 2019 version. It is not forward thinking and does not contain an underlying strategy for the five, ten or twenty year term. It does not demonstrate a strong, quality vision and has not been positively prepared. The success or failure of any particular element of the plan is ultimately in the hands of the developers' personal timelines and their desire to profit from land within their control.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The Parish Council are the elected representatives of the residents of Stretton on Dunsmore.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

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Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: Stretton on Dunsmore Parish Council

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	81				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
(2) is Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
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The site to the west of Fosse Way is allocated for c40 dwellings. It is a poorly drained site with marsh grass and subject to regular flooding. Indeed, it is here that Joseph Elkington developed his rural land drainage templates that form many of the land management knowledge still in use today.

The January 2024 floods in the village also emanated from this area and land the other side of the Fosse Way and then ran down into the village. There has been work to the drains on the Fosse/ Brookside junction which has helped but the pond in the field at Well Head probably needs to be increased and better managed. The land is very wet.

The site is some distance from the school and recreation facilities at Plott Lane but, as the crow flies it is not far.

None of these issues are insurmountable.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggested modifications are:

a. Detailed studies of the flood risk and drainage needs of the site which will likely require an increase in the pond at Well Head and better management of the land drains. A previous proposal in 2019 suggested the public open space should be facing the Fosse Way with a pond (to drain the land) creating a village green, an alternative could be adjacent to the footpath. It also suggested terraced cottages similar to those in the village centre. This was well supported by residents.

b. The public open space referenced in the requirements could effectively be a village green, with a pond.

c. The PRoW locally known as 5 Acres is referenced in the Development Requirements for upgrading but does not cover the full length of the path which runs from Brookside to School Lane. If this PRoW were improved along the full length, possibly with low level lighting, it could be used to provide a safe route for children and adults from this site and this side of the village, to and from School. It would also provide a route for residents from the new developments at Squires Cross and The Croft to the village centre, doctors' surgery, pub and the Fosse Playing field. This is important as the village centre does not have footpaths.

d. The Development requirement suggests orientation towards the memorial on the A45/Fosse way junction but the Grade 2 church is higher than the war memorial and it would be more pleasant to face the village centre and especially a village scene rather than a busy dual carriageway.

e. The village needs housing suitable for young families and older people and, as the policy is for 40% low cost housing, that need could be met with more terraced cottages as this site is nearer the village centre and the doctor.

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Post Code	<input type="text" value=""/>	<input type="text"/>
Telephone Number	<input type="text" value="02476540429"/>	<input type="text"/>
E-mail Address	<input type="text" value=""/>	<input type="text"/>

Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: Stretton on Dunsmore Parish Council

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	348				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
(2) is Sound	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
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It is pleasing to see that RBC have removed a potential expansion of the Squires Road site (134) from the Proposed Plan. That site was recognised as being problematic because of the access onto Plott Lane (either directly or via Squires Road). Traffic wishing to travel West could access the A45 westbound but any traffic wanting to travel East, North or South would have to negotiate the Conservation area in the centre of the village causing significant load and pedestrian danger as there is no continuous pedestrian footpath. Traffic returning from the West would similarly have to negotiate the centre of the village.

It is regrettable that, RBC have now chosen to include the Croft (Site 348) in the Local Plan simply to restore the number of homes allocated within Stretton on Dunsmore. The Croft is adjacent to the Northern boundary of the Squires site. Its access would be onto School Lane but it suffers all the same issues as the Squires Cross site. Traffic intending to go North, East or South would have to pass through the village centre. Surface and foul drainage would use the same part of the sewer network. Proximity to the A45 would mean that noise mitigation is likely to be required and the development would be a significant extension of the village boundary. The previous local plan (2019) allocated land at Squires Cross for 55 new homes but stipulated a strong landscape buffer on the Northern and Western boundaries to deter or prevent site creep. This potential allocation ignores that buffer and develops the green field immediately to the North. Developing here severely compromises the village's Northern boundary and the important green separation corridor from the A45.

RBC have not carried out an ecological assessment of the site. In developing Squires Cross the Croft was identified as both a home for GCN and the refuge that GCN would relocate to when disturbed by the Squires Cross development. It remains an important GCN habitat.

Residents of the area have not had an opportunity to submit their views on the suitability of the allocation because it was non preferred at the Regulation 18 consultation stage. It has not been subject to the scrutiny envisaged in the relevant Regulations. It cannot be said to have been considered on its merits. Taking but one example, it may be said to share the same traffic routing issues as the rejected sites.

Including it suddenly, and without consultation, when it is clearly a contentious site, is unreasonable and potentially unsafe. Residents have a view that, in this respect, the plan has not been positively prepared.

The plan is therefore legally non-compliant with the 2012 Regulations and could be declared

unsound by the Planning Inspector.

The same iteration of the proposed plan removes the employment allocation in neighbouring Ryton on Dunsmore which is the only employment site within walking or cycling distance of the proposed Croft development. Removing the employment allocation weakens the argument for homes in this location.

The village of Stretton On Dunsmore currently consists of around 500 homes. The allocations at Squires Cross (55), Little Orchard (28), Well Head (40) and on the Fosse (3) already add 25% more homes without any change to roads or infrastructure. The allocation of 70 new homes at the Croft results in 200 new homes (over 40% expansion) with no additional employment opportunities, limited road connectivity, no planned infrastructure improvements, NHS or Education provision.

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Whilst a number of these issues might be revealed and challenged at the detail planning stage the inclusion of the site in the local plan gives an impression of presumed consent which would be difficult to retreat from. The whole Local Plan would be substantially better if the Croft allocation were removed. If it cannot be removed the developer's offer to create a revised school access from the development site should become a Development Requirement as should improved safe access to the A45.

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Part B – Please use a separate sheet for each policy or site you wish to comment on

Name or Organisation: Stretton on Dunsmore Parish Council

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	3, 81 & 348				

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The submitted Local Plan proposes a mix of housing in the town and in rural settlements. The allocation in rural locations far exceeds the employment opportunities in those areas and therefore will increase the need for travel. Rural areas have no Secondary or Tertiary education opportunities further increasing the travel needs of young people. The rural areas are not well served by Public Transport. The local authority responsible for public transport (Warwickshire CC) has declined to provide a plan for sustainable (or indeed any other) Public Transport in the forthcoming period. Instead criticising the plan for its inevitable effect on the environment. The rural allocations are seen by RBC as important because they are smaller and more quickly implemented. However this plan follows on from the 2019 plan which similarly allocated significant rural sites. Within that plan's five year period many of those 'low hanging fruit' sites came forward and the larger urban extensions have been slow to progress. In addition, since the 2019 plan was adopted, 694 'windfall' homes have either been built or already have planning permission. The current proposal looks set to deliver the same mix and therefore the reality of rural uptake is substantially more significant over the long term than that indicated by the plan.

The proposed local plan is not compliant with NPPF paragraphs 109, 110 and 111 which state:-

Paragraph 109 (2024 update)

Transport issues must be considered from the earliest stages of plan-making with an emphasis on "vision-led" rather than "predict and provide" transport assessment.

Paragraph 110

"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."

Paragraph 111(a)

Policies should support a mix of uses to minimise journey lengths for employment, shopping, leisure, education, etc.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness

