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Friday 16TH May 2025

Preferred Option Consultation,
Development Strategy Team,
Town Hall,
Evreux Way
Rugby
CV21 2RR

Re: Local Plan review Preferred Options consultation

Please accept the following observations and comments as the collective views of Stretton on Dunsmore Parish Council upon the Preferred Option Consultation Document.

1. General planning approach

The draft local plan and Preferred Options Consultation Documents do not contain any references or commitments to a rural transport strategy. It seems likely therefore that there will be little investment in public transport or initiatives in this area and that there will consequently be no reduction in the use of cars for rural families to commute, travel for education or shop. It is notable that the Public Transport Accessibility score for the sites in Stretton on Dunsmore is currently 1 (of a range 1-6, 1 being the least accessible).

There is no evidence for the existence of local employment opportunities. Indeed rural settlements have long suffered the effect of small business closures and already risk becoming dormitory communities.

The allocation of 1500 homes in villages to the west of Rugby, each with an average of two working adults, may well result in additional car journeys to work (Coventry, Leamington or Rugby) on every working day and some weekends. (*At an average of 6 miles each way that is 6miles x 2cars x both ways x 300days equals 7200 annual miles per home which times 1500 homes is 10.8 million additional car miles per year compared to homes built in a town or adjacent to where public transport and nearby employment is available*) Recreational journeys are assumed to be equal in town or rural settlements but could be reduced in urban areas with transport initiatives.

The plan's spatial strategy, of allocating significant development in rural villages, is therefore not supportive of RBC's ambitions for Net Zero or Sustainability. Its value is in the attractiveness of the development opportunities and therefore an assumption that new homes will come on stream in a reduced timeframe. Whilst that may be true it does not form exceptional circumstances in which prime green belt should be released. The Houlton and South West Rugby allocations provide enough capacity for the five year land supply but there are fears that they will not be developed within the five year timeframe. Before committing to release further rural greenbelt efforts should be made to understand why the major sites are coming forward slowly and to explore potential incentives to accelerate development paths.

Larger sites are preferable as they develop new communities and infrastructure can be designed in to serve needs. Smaller village sites are more attractive as they largely rely on existing infrastructure which is then only revised and improved as it can be demonstrated to be failing. That is an unreasonable burden for current residents. If rural developments are

made they need to be adequately planned and road and foul sewage infrastructure improved before occupation. Where rural communities have multiple sites proposed they should be modelled as a whole and not individually.

Sufficient thought needs to be put into the road transport network at a district level and not just junction capacity modelling. Junctions can be designed and implemented to high standards but if the local network is constricted because of an unavoidable canal bridge or narrow passing place flow cannot be expected to meet design levels.

There is no reference to the suitability of Stretton on Dunsmore to host the infrastructure required for the housing growth proposed by the preferred options plan. We do not believe the intrinsic infrastructure in Stretton is capable of servicing additional homes in the numbers proposed. The roads in and around the village are narrow and maintained with the priority of village lanes. Many are single track roads with limited pull ins and existing damage to verges and passing places. An increase in traffic would further damage the shoulders, verges and the amenity of the village as a whole. Public transport is not well provisioned. The bus service to Leamington Spa was decreased recently and caused immense problems for people who commute.

2. Request to include site at Old Orchard, Stretton on Dunsmore

This site, with an allocation of around 25-30 homes, is identified in the current Rugby Local Plan but omitted from the options consultation document. The plot is no longer within the Green Belt and has already been allocated for development but has not been developed as yet. It was subject to a planning application in 2020 (R20/0285) which ultimately failed on a number of technical grounds. There is no reason to think that it would not be brought forward again in the next five year period and it should be included in the Preferred Options Document as a site in its own right. It makes a valuable contribution to the five year land supply.

There is no reason not to include the allocation. Omitting it is disingenuous and simply obfuscates the total new home allocation proposed for Stretton on Dunsmore. Omitting it ignores the site's contribution to traffic, drainage and demand on local infrastructure. As traffic and foul water generation are likely to be a feature of the arguments affecting sites 81 and 134 it is vital that a holistic appraisal and approach be adopted.

Stretton on Dunsmore Parish Council request that this site is included as a preferred allocation in all future proposals.

3. Site allocation 81: Well Head, Stretton on Dunsmore

The site at the junction of Fosse Way and Brookside is, in many ways, a reasonable proposition for development. It has direct access to the Fosse Way and therefore North, South East and West directions of travel. It is within easy walking distance of the centre of the village, GP surgery and School. It is located on the original Well Head and ancient settlement so may require some archaeological assessment prior to development and the land is peppered with natural springs so deep pile or raft construction may be required with consequential costs. There is also some concern that property gardens may be subject to standing water and make them unattractive to purchasers. Draining of the site would be difficult due to topological constraints and would result in a significant loss of biodiversity.

The allocation was proposed in the previous round of plan formation in 2016 and dismissed largely on the basis of WCC Highways refusal to contemplate a direct access to the B4455 (Fosse Way). Whilst that opinion is a few years old, stale and must be revisited it seems likely that a similar view would exist or that to overcome the objection significant junction improvement would be required. Stretton on Dunsmore Parish Council believes that no decision to allocate the site should be made until a full study by WCC has been completed as any acceptable solution might well make the site unlikely to be deliverable in the five year time frame.

If RBC is minded to pursue the site allocation Stretton on Dunsmore PC requests that special treatment be applied to the Eastern and Northern existing boundaries. The landscape view as the site is approached south along the B4455 is particularly important as it demarks a green barrier between the A45 and the village settlement. Loss of the Northern green boundary would substantially impact the approach landscape and make the development (village) visible from the A45. Similarly the Eastern green boundary on to the B4455 serves to define the village as a rural environment. Its loss would significantly urbanise the village approach.

4. Site Allocation 134: Land to the North of Plott Lane and to the West of Squires Road

This site allocation would form an extension to the Squires Cross development currently under construction and its design would no doubt be informed by the current development. It is the largest single site allocation in Stretton on Dunsmore and, for a rural setting we believe it would be too densely populated with little or minimal open or recreational space. Whilst financial compensation can be put in place to offset the lack of open space this has not worked well for Squires Cross and it would be essential to incorporate tree canopy cover, green corridors and accessible open space in a rural development of this size. Stretton on Dunsmore Parish Council requests that, if this site allocation is to be progressed, that potential density figures are revised downwards to avoid potential developer pressure for maximum occupancy.

In any event the site allocation proposes an indicative access onto Plott Lane which is single carriageway at that point and road improvements would be required to enable safe sight lines and capacity. The largest concern with this site is the location in relation to the village itself. Being located on the North Western side of the village road access is constrained to the country lanes leading into the village from the West or the village centre which has several pinch points and would stall with an increase in traffic flow. This site is an example why it should be a requirement to model local area traffic movements and not just local junction capacity. Such modelling must take into account the cumulative effect of existing homes, homes under construction and the effect of all new sites being proposed. Analysis of the current and site specific loads will dramatically under tell the story.

Similarly there is a concern that development on this allocation will stress the foul water infrastructure beyond the extent that Severn Trent can reasonably improve it and that, as a result, accidents and spillages will increase from an already intolerable level. Foul water sewers currently flow through the centre of the village adjacent to the watercourse and are pumped to Ryton on Dunsmore. It is far from clear that this part of the network has any viable improvement options and a full study from Severn Trent is required to understand the additional infrastructure required to support substantial development in the village. If a major scheme is required (as locals believe) then the five year deliverability of this allocation must be called into question.

Yours sincerely,



Mrs Helen Stewart
Parish Clerk to Stretton on Dunsmore Parish Council