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	Mrs	
First Name	Helen	
Last Name	Stewart	
Job Title (where relevant)	Parish Clerk	
Organisation (where relevant)	Stretton on Dunsmore Parish Council	
Address Line 1	3 Orchard Way	
Line 2	Stretton on Dunsmore	
Line 3		
Post Code	CV23 9HP	
Telephone Number	02476540429	
E-mail Address (where relevant)	Strettonondunsmoreclerk@gmail.com	

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		Policy		Policies Map	
Site ID	3, 81 & 348				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes		No	✓
(2) is Sound	Yes		No	✓
(3) complies with the Duty to co-operate	Yes		No	✓

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.

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 eUect 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 oUering 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

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.

If this plan were to be accepted it should be modified to reduce the rural allocations in line with a study of the reasonable employment and education opportunities in the vicinity of each site.

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.*
After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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.

The Rugby Borough Council Privacy Notice for Development Strategy is available here:
https://www.rugby.gov.uk/w/privacy#development-strategy
The Planning Inspectorate's privacy notice can be accessed here:
https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices