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	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.

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.

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.

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.

(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.*
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