

## **Rugby Borough Local Plan Preferred Option Consultation**

### **0.0 Introduction**

0.1 Thank you for giving Dunchurch Parish Council the opportunity to respond to this important consultation. Our representation is detailed below.

0.2 This is an issue of great interest and concern to the community of Dunchurch.

0.3 This response focuses on those specified questions and matters that are of most significance to the parish.

0.4 In particular, the proposed residential allocations of sites Ref: 341 – Land South of Coventry Rd, Dunchurch and Site Ref. 90 – Homestead Farm, Dunchurch (for approximately 30 dwellings).

0.5 We, like many others, strongly object to these proposed allocations and urge that they be removed. The compelling evidence provided by this Parish Council and many others will clearly demonstrate that the sites are unsuitable for development and would not constitute sustainable development.

### **1.0 General – Flawed Consultation**

1.1 Can we say at the outset that we consider the consultation to be flawed and, at the very least, should be undertaken again. In particular, as Dunchurch has been omitted from the settlement hierarchy detailed at Policy S1. We understand that it should have been shown as a Main Rural Settlement. It is not. Indeed, it is not identified in the policy. This is a significant Policy especially as it states at Criterion A *‘New development will be of a scale commensurate with the services and facilities of the settlement in which it is located and in accordance with the following hierarchy.’* The omission of Dunchurch in the hierarchy is a serious omission.

1.2 The effect of this procedural flaw is that the document has not been prepared in accordance with the necessary regulations, lacks certainty and is generally unsound. The residents of the parish and other stakeholders may not have engaged in the consultation on this Policy as they may not have considered that it related to

Dunchurch. Furthermore, it is unclear when the subsequent policies and supporting documents refer to Main Rural Settlements whether they apply to Dunchurch.

1.3 Can I add we have also noticed other factual errors in the document, though perhaps not as serious as this one. For example, Site 122 – Fenley Fields, is described as being in Cawston, when it actually falls within the Dunchurch parish boundary.

## **2.0 Policy S1: Settlement Hierarchy**

2.1 The settlement hierarchy detailed in this policy is at the heart of the consultation document. The overall strategic approach is to concentrate development in the most sustainable locations. An approach the Parish Council fully supports.

2.2 In support of this, the towns and villages within the district, following an assessment, have been classified into a settlement hierarchy.

2.3 This hierarchy has four tiers. In general terms the higher the settlement is in the hierarchy the more suitable it is for development. As Policy S1 states at section A '*New development will be of a scale commensurate with the services and facilities of the settlement in which it is located and in accordance with the following hierarchy*'. Again, a broad approach we support.

2.4 Dunchurch has been identified as one of nine main rural settlements in the hierarchy. This is the second tier in the hierarchy after Rugby Urban area, '*which will be the main focus for new homes and employment*'.

2.5 The consultation document also states that the main rural settlements '*will accommodate development*'.

2.6 Whilst we support draft Policy S1 in terms of the principle of directing growth to the most sustainable locations, there are major shortcomings and flaws in the process carried out to determine where towns and villages are classified into the hierarchy. It is especially deficient in relation to Dunchurch.

2.7 In particular, as the assessment focuses on the amount of provision, and has insufficient regard to other equally important considerations, in particular their accessibility and capacity.

2.8 If we take Dunchurch as a good example of the flaws in the approach taken, many of the assets listed are tired and operating at or close to capacity. Just to give one example - both, Dunchurch Infant and Junior schools are at full capacity. Indeed, children are now being offered places in different schools, and landlocked, meaning they cannot expand to accommodate additional pupils. Despite this, the parish has the highest score for school provision. It is illogical to score a village highly for having a service or facility when in practice that service is not available to them!

2.9 If the aim of this hierarchy and associated evidence is to identify and justify the settlement hierarchy and strategy for the distribution for new housing and other forms of development in Dunchurch and more widely, it is flawed and unsound.

### **3.0 Policy S2 Strategy for Homes**

3.1 It is not a strategy. Rather it is a 'pepper-pot' of available sites that are poorly integrated and justified, and whose relationship with Policy S1 is at best weak.

3.2 Firstly, the Policy and associated allocation do not make sufficient provision for housing growth in and around Rugby. Rugby is the main town in the district and where a significant proportion of the district's key services and facilities, and population are located. This is despite Policy S1 stating '*Rugby urban area (as shown on the policies map) will be the main focus for new homes and employment*', which evidently it is not.

3.3 Secondly, we strongly believe that all other reasonable options for meeting the identified need for development in the district have not been fully examined as advocated by national planning policies.

3.4 Paragraph 124 of the National Planning Policy Framework (NPPF) requires that planning '*strategic policies should set out a clear strategy for accommodating*

*objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land'.*

3.5 The approach taken in the draft is flawed as it has insufficient regard to this requirement contained in the NPPF, in particular maximising the use of previously-developed or brownfield' land (the focus of the focus of development is on greenfield sites).

3.6 The former Westway Car Park; Round Gardens and Herbert Grey College all in Rugby are just a few good examples.

3.7 All of these previously developed sites we consider to be very suitable and sustainable locations for housing but they appear to have been overlooked. Can we stress these are just two examples. There are bound to be many other previously developed and brownfield sites that have been overlooked.

3.8 Indeed, within Dunchurch itself, there is a site that would be a far more appropriate location for any future development—namely, the depot located on Southam Road, currently owned by Balfour Beatty and Warwickshire County Council. This site, already in industrial use, has clear potential for redevelopment.

3.9 Both national and local planning policy strongly advocate for the prioritisation of brownfield land over greenfield in order to protect valuable agricultural land and the open countryside. Failing to consider such sites contradicts these policy aims and undermines the principles of sustainable land use and responsible planning.

3.10 Further, we consider that the availability of grey belt sites in the Green Belt has not been adequately explored as advocated in the NPPF.

3.11 Nor have other reasonable options such as building at a higher density or alternative sites. This includes alternative suitable sites such as Site 17, titled South West Rugby Employment Phase 2 in the Preferred Options Consultation document, which is currently designated as safeguarded land under the 2019 Local Plan, and has the capacity to accommodate 210 dwellings.

3.12 Dunchurch Parish Council wishes to formally register its support for Site 17 to be reallocated for residential use rather than employment. Given its location and

potential, this site represents a far more suitable and sustainable option for housing than the greenfield allocations currently proposed.

3.13 We strongly consider that much of additional housing growth required can be accommodated on sites in and around Rugby in accordance with Policy S1; (ii) previously developed, brownfield and grey belt sites in the Green Belt (including sites not perhaps previously fully considered) and (iii) greater optimisation of existing identified sites, including building at a higher density. This would negate much of the need to develop on greenfield and other sites. This includes the two housing sites proposed in the parish.

3.14 These are fundamental issues with the plan preparation that cannot be rectified through tinkering or minor modifications.

#### **4.0 Policy S6 Residential Allocations**

4.1 This policy proposes two sites in the parish for residential development. These are Site Ref. 341 - Land South of Coventry Rd, Dunchurch (for approximately 180 homes) and Site Ref. 90 – Homestead Farm, Dunchurch (for approximately 30 dwellings).

4.2 It does not support, and strongly objects to, both these proposed allocations. They should be removed.

4.3 Not only do they fail to provide for a commensurate level of housing growth relative to the level of services and facilities in the parish as required by Policy S1, but the sites are simply not a suitable nor sustainable location for this type of development.

4.4 While the proposed allocations are not without some benefits, in particular, the provision (we assume) of affordable housing, these would not, by a wide margin, outweigh the harm they would cause, especially to local services, infrastructure and wildlife as well as air quality and highway and pedestrian safety. In addition, it is contrary to national and local planning policies.

4.5 It is not that the parish is opposed to new house building. Far from it. It has already experienced significant house building in recent years. In 2024 alone, we estimate that planning permission was granted for over 1,500 new homes in the parish. This does not include other permissions in other recent years including the outline approval in 2022 for approximately 350 new homes to be built at Land North of Station Farm Cottage, London Road. If this was not enough, there is more in the pipeline. The South West Rugby Masterplan SPD proposes 5,000 new homes, together with a 35-hectare employment sites, amongst other things, between Cawston, Bilton, and Dunchurch, much of will be in the parish and will undoubtedly affect it.

4.6 In addition to these major developments, the Parish Council has been consulted on 131 dwelling applications from within the village between 2015 and 2024, which have subsequently been approved. This clearly demonstrates our continued willingness to support proportionate and sustainable growth where appropriate.

4.7 It is strongly considered that the parish has already made its proportional and sustainable contribution to meeting housing supply. There are already concerns about the adverse cumulative impact these developments in the parish and wider area will have on the character, sustainability and social and physical infrastructure of the parish. The proposals are too much.

4.8 Turning in more detail to why the sites are not a suitable nor sustainable location for residential development.

#### Adverse impact on services, facilities and infrastructure

4.9 While Dunchurch has some services and facilities, these are limited and many already over-stretched. Dunchurch Junior School is already just about at capacity. It has a published admission number of 264 and currently has 261 pupils on roll. Indeed, there have been two unsuccessful appeals this academic year for children requesting places in year groups that are currently full. There is no scope for increasing class sizes due to the constrained nature of the site. The situation is similar with the adjoining primary school.

4.10 The local GP surgery, Dunchurch Surgery, is also facing critical pressures. According to Dr. Chesser (Practice Partner), the practice is not operating at 82% capacity—as sometimes claimed—but at 110% capacity. Originally designed to

serve 6,500 patients, the surgery now supports over 8,200. It is neither financially viable nor physically possible for the surgery to expand, and the doctors have made clear their intention to remain a traditional, village-based GP practice, rather than becoming a larger, town-centred facility.

4.11 Dr. Chesser also confirmed that the 4,000 new homes already approved in the area are classified under Dunchurch—not Rugby—for planning purposes. However, residents of these developments will not be able to register with Dunchurch Surgery due to the lack of capacity.

4.12 This means that residents of the development will need to access other services, such as secondary schools, medical facilities, shops and employment in larger settlements. This is likely to require access by a private car, public transport or cycling.

#### Negative impact of transport issues

4.13 There are already issues with highway and pedestrian safety and transport issues more generally around the sites and the wider area. These include:

- There is already severe congestion and associated issues of highway and pedestrian safety at the A45/M45 junction, and surrounding corridors.
- This is not only the view of the Council but independent studies – a recent report showed that Dunchurch Crossroads already experiences peak-time speeds at just 40% of free-flow conditions (source: Transport Network Analysis, SLR Consulting, Feb 2025, pp. 9–11).
- In addition, in October 2024, the Parish Council commissioned a traffic and speed survey through Warwickshire County Council. The attached document outlines traffic volumes across the four main arterial routes through Dunchurch and the unsustainable volume and speed of vehicular traffic moving through Dunchurch.
- The access points to the proposed sites are directly opposite the planned link road, raising significant concerns about traffic flow, safety, and potential congestion at this junction.
- Recent developments, including the Symmetry Park project near Thurlaston—situated on the opposite side of the A45/M45 junction—have already begun to

increase traffic in the area. Alongside further allocations proposed within the South West Rugby strategy, these developments are expected to impact corridors extending toward Dunchurch. Cumulatively, these developments risk overloading shared routes, potentially worsening congestion and safety issues beyond the levels currently forecast by existing models.

4.14 Closely related, there is already insufficient parking in the centre of the village. This is reflected in that the Parish Council regularly receives complaints from residents living on local roads regarding inappropriate and unsafe parking. The existing parking infrastructure is already under significant strain, and there is no remaining capacity to accommodate additional vehicles associated with the development especially at peak times such as school drop-off and pick-up.

4.15 The proposed developments would only make what is an already unacceptable highway and parking position worse. As such, it is clearly at odds with national and local planning policies, with their emphasis on supporting safe and sustainable transport options. In particular paragraph 116 of the NPPF, which states '*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios*'. The proposed allocation would have an unacceptable impact both individually and collectively taking into account the significant amount of residential and other forms of development proposed in the local area.

#### Over reliance on the car for transport journeys

4.16 The sites and the wider parish are served by a small number of bus services between Rugby and Coventry and Rugby to Leamington, which collectively provide a very limited daytime service (about five times a day), with effectively no services in the evening or on a Sunday. The nearest train station is some distance away. This coupled with the paucity of local services, will inevitably mean that occupiers of the developments will rely on a private car for most journeys. As such this is contrary to local and national planning policies that seek to direct development into the most sustainable locations.

### Adverse impact on air quality

4.17 It is recognised that there is already a serious issue with poor air quality in the area. This is reflected in that in September 2017, Rugby Borough Council published its *Air Quality Monitoring and Management – Annual Update*, which acknowledged that ongoing development was contributing to deteriorating air quality, particularly at the Warwick Street Gyrotory and the Dunchurch crossroads—both identified as areas of exceedance.

4.18 The Dunchurch crossroads, in particular, is not only a bottleneck for traffic but also a serious source of pollution. Increased vehicle movements from new housing—especially if each household brings two or more cars—will significantly elevate pollution levels, exposing residents to harmful and potentially toxic air. This same concern applies to Southam Road, which will also see increased congestion and air quality deterioration.

4.19 The report stated that while some mitigation was expected from the approved Ashlawn Road housing development, it would be insufficient to support additional growth. The proposed long-term solution—a Southwest Broad Location Bypass and associated link roads—was identified as essential for achieving meaningful air quality improvements in Dunchurch. However, these infrastructure improvements have not yet been delivered. Further development in the area without these measures in place will only worsen existing air quality issues, especially in terms of the significant increase in traffic movements it will generate. This will undermine both public health and the Council’s own environmental objectives as well as being contrary to national and local planning policies. As paragraph 187 of the NPPF states, *‘Planning policies and decisions should contribute to and enhance the natural and local environment by:....preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution’.*

### Harm to biodiversity

4.20 While the sites do not contain any nationally or locally recognised sites, this does not mean that they are not of biodiversity value. Their relatively open and undeveloped nature and the presence of trees and other environmental features provide important and much-valued habitats for a variety of wildlife and

wildflowers. Their development would result in the unacceptable permanent loss of biodiversity, disruption to local ecosystems and degradation of natural green spaces. The parish has already experienced the removal of hedgerows and mature trees, which has diminished local habitats.

#### Negative impact on important heritage assets

4.21 A significant portion of Dunchurch village is designated as a Conservation Area and the village contains numerous Grade II listed buildings and other heritage assets of local and national importance. There is a serious risk that these developments would have an adverse impact on the setting of several of these heritage assets as well as the assets themselves.

4.22 We would like to add that should consideration be given to putting Lodge Farm (Site 73) forward for development - for example if it considered that any of preferred sites are considered unsuitable - the Parish Council and the wider community will strongly object to this.

#### Environmental impact and flood risk

4.23 In addition to the above, the effect of these developments on the local water table must also be considered. Large-scale residential development poses a genuine risk of altering groundwater levels and increasing surface run-off. There is already a history of localised flooding in the village, and the cumulative impact of multiple developments could heighten this risk significantly. A comprehensive flood risk assessment should be undertaken before any development is permitted, to avoid endangering existing homes and infrastructure.

### **5.0 Policy S8 South West Rugby**

5.1 We strongly support provision (f) of this Policy. This proposes that in order to maintain the physical and visual separation from the Dunchurch settlement boundary and some of the surrounding villages, there should be '*a significant green buffer to prevent coalescence.*' This buffer is strongly supported. It will provide an important and much needed tool to prevent the coalescence and maintain a gap between the village of Dunchurch and the surrounding settlements and help to protect its distinctive setting and identity. There will also be wider benefits such as protecting important green spaces close to where people live and conserving important heritage and biodiversity assets. We fully endorse the proposal.