

Stretton on Dunsmore Parish Council,
3 Orchard Way,
Stretton on Dunsmore,
CV23 9HP

Email: strettonondunsmoreclerk@gmail.com

Wednesday 15th May 2024

Mr Paul Varnish,
Rugby Borough Council Planning Department
Evrux Way
Rugby
CV21 2RR

Response to consultation on planning application (R24/0289)

LAND AT NORTH OF SQUIRES ROAD, SQUIRES ROAD, STRETTON-ON-DUNSMORE

Dear Mr Varnish,

Thank you for the opportunity to comment on planning application R24/0289. The Parish Council has spent a significant amount of time studying the planning application. At its ordinary meeting on 13th May 2024, the Parish Council agreed to submit the following observations and comments.

In considering its response to this application Stretton on Dunsmore Parish Council has actively sought to engage with the applicant in a positive and proactive manner. It met pre-application (but post design) with the Developer and encouraged a Community Awareness event. Its feedback, and that of the community, has not visibly informed the application.

Following the submission of the reserved matters application (R24/0289) Stretton on Dunsmore Parish Council has a number of major concerns about the completeness and quality of the application;

Concern 1: Density of development

The Rugby Local Plan (DS3.9) identifies the site as suitable for 'Around 50 dwellings' and the previous outline application (R17/1767) approves 'a maximum of 55 dwellings'. The application itself variously refers to the site as 2.2, 2.15 or 2.1 hectares constrained by landscape buffers and drainage schemes to a developable area of 1.72ha. Given that the development is so constrained it is considered that the Local Plan estimate of 50 dwellings is generous. Whilst it may be possible to accommodate 55 dwellings on a 2.1ha site, the reduced developable area makes this a logistical challenge.

The desire to achieve the maximum 55 dwellings has led to a design layout with minimal space between dwellings, smaller than desirable private gardens (some dwellings with no outside space), compromised rear garden/bin access (for example plots 17, 22, 31 and 52)

and little or no public space. The overall streetscape is one of uniform box buildings a small number of garages and hardstanding for 108 vehicles.

The design statement states that the development favours 'family housing' but the design does not contain any shared open space, children's play equipment or play areas. Whilst the development may make an S106 contribution to offsite open space, policy HS4 requires this to be deliverable within the local area. No proposal for how this might be achieved has been included. The Rugby Local Plan (appendix 4) identifies Stretton on Dunsmore as having 0% surplus Children's Play space.

Contrary to the Rugby Local Plan the development does not offer a high quality design which enhances its surroundings. The design promotes a cramped, highly regimented, and overloaded streetscape and is not in keeping with the adjacent development of Squires Road or the wider community. The design does not bring forward any element to benefit or enhance the community.

The Planning Officer is invited to refuse the application on the basis that detail design is not sustainable and not in keeping with National Policy, RBC policy DS6, HS1, HS4 or SDC1.

Concern 2: Proximity to Knightlow School and KCP Nursery

The Eastern boundary of the site abuts the shared space of a primary school and an early years facility. Children playing and working outside has great social and health benefits but can be noisy and intrusive during the spring and summer as weather permits. The Nursery has a right to not have its activities curtailed by complaints about noise from very close neighbours.

The Parish Council is concerned that-

- 1) The process of construction and subsequent occupation will disturb the existing fence between the neighbours such that safety and safeguarding issues arise.
- 2) Plots 30, 41, 43 and 55 are situated so close to the shared boundary that conflict is extremely likely. The acoustic fence mitigation measures are unlikely to stand the test of time and future residents are likely to feel that the School, or Nursery, or both, impinge on their domestic activity. Approving this layout would be contrary to policy SDC1.

The Planning Officer is invited to refuse the application whilst dwellings remain located so close to the KCP Nursery and school boundary. If the Planning Officer is minded to approve the application the Parish Council respectfully requests the addition of a Planning Obligation to erect a safeguarding fence, in line with the LEA requirements for new schools, along the eastern boundary of the site in addition to the landscape barrier.

Concern 3: Housing mix

The Developer proposes a housing mix which does not meet the adopted Local Plan target. There are no 1 bed open market properties against a target of 5-10%, The 2 bed properties

are below the minimum of 25%. 4 bed open market properties are above the 25% maximum. Low cost 1 bed properties are below the SMHA minimum of 30%. 3 and 4 bed low cost homes are above the maximum SMHA figures given as a condition in the outline planning application approval.

The Developer has not carried out a local market needs analysis or considered the local situation. Residents have expressed a need for 1 bed open market homes to assist downsizing and supporting an ageing community thereby releasing larger properties in the locality. A bias towards 3 and 4 bedroom homes favours young and growing families often with dual employment and school commitments outside of the locality. Biasing this way therefore increases the number of daily car trips and is not in line with a sustainable agenda.

Feedback from the existing community indicates a lack of affordable housing for those who have rural work commitments and those who wish to maintain family support networks. The application does not mention the intended audience for the affordable housing element.

The Planning Officer is invited to refuse the application on the basis that it is not sustainable and contrary to the adopted Local Plan's SMHA housing mix, Policy H1 and SDC1.

If the Planning Officer is minded to approve the application the Parish Council respectfully requests the addition of a Planning Condition to ensure that the affordable housing agreement has a priority for those families able to demonstrate a local work or family connection to the village.

Concern 4: Surface Water Drainage

The site largely forms the crest of the hill in Squires Road and is not known to flood. The site slopes gently to the East and South. An existing seasonal collection pond in the south-eastern corner is rarely found wet and has been noted by the ecological survey to be an unlikely home for aquatic life. Surface water either infiltrates locally or flows overground to the east onto the School playing field which is subject to surface water cross flows. The School has suffered from surface water flooding recently. Very little surface water from the development area currently enters the surface water network.

Policy SDC6 calls for a sustainable drainage system to deal with the decreased permeability and the quicker peak runoff times post development. The application contains a design for an attenuation basin that discharges into the surface water sewer in Squires Road. Policy SDC6 makes clear that this is a non preferred option but where it is used the NPPF allows for attenuation discharge up to the greenfield runoff rate. (Qbar)

From the connection in Squires Road the surface water sewer falls 13m (1 in 14 fall) to the junction with Plott Lane joining the Plott lane surface water drain and flowing the 250m to the village centre where it joins the Stretton Brook. The fall over the Plott Lane length is considerably less providing a shallow gradient and a barely adequate flow (1 in 250 fall). The Plott Lane surface water sewer is known to surcharge during a less than 30 year event

with the excess flowing over the road surface on its way to the village centre. The village centre in turn floods as the Brook levels rise.

The surface water discharge from the development site will not affect the development site or Squires Road but it will have a compound effect on Plott Lane and the village centre because the scheme would now direct surface water away from ground infiltration towards containment in a sewer. It is for this reason that the residents are concerned that the surface water outflow from the development should be kept to an absolute minimum. Certainly no more than the greenfield Qbar rate and preferably less.

Policy SDC5 states that developments should not increase the flood severity in adjoining areas. This scheme does not achieve that.

Policy GP4 states that a development should not prevent other development objectives from being met. If there is any headroom in the Plott Lane surface water sewer capacity then this proposal seeks to absorb all of it. In turn that means that the developer of the other Stretton on Dunsmore allocated development site on Plott lane (DS38) would be impeded in (and possibly prevented from) designing their own SuDS scheme discharging to the surface water sewer.

If the Planning Officer is minded to approve the application the Parish Council respectfully requests the addition of a Planning Condition to restrict the maximum surface water discharge rate to 80% of the green field runoff rate (Qbar)

Concern 5: Greenfield runoff calculation

The normal LLFA preference is that runoff must not increase due to the development and all runoff should be first restricted to the greenfield 1 in 1-year runoff rate during all events up to and including the 1 in 100-year rainfall event with climate change (Qbar).

The applicant's Drainage Strategy Note prepared by DDS states at 1.3 "*The greenfield run of rate for the site has been provided in the Flood Risk Assessment report produced by Weetwood. The Qbar rate set out in the report is 8.1l/s.*" The application on the planning portal does not appear to contain a report by Weetwood. The outline application (R17/1767) does contain a Weetwood report and it is assumed this is the document referenced.

The comprehensive Weetwood report (dated 10th September 2020) does not indicate a Qbar value of 8.1l/s. It appears to calculate a Qbar value of 3.4l/s per hectare. (p21)

A cross check using the HR Wallingford UKSuDS tool suggests that Qbar values for the site would range from 3.1l/s (most permeable soil type) to 5.8l/s (least permeable soil type).

A previous application for the same site in 2013 (R13/250) calculated the Qbar value to be 5l/s but was considered by the LLFA to be too high and not supported by calculation.

It is not clear where the Developer derives the 8.1l/s Qbar value and the reports are sufficiently contradictory that this topic is considered worthy of significant further study,

The Planning Officer is invited to refuse the application on the basis that the surface water strategy has not been properly addressed. If the Planning Officer is minded to approve the application the Parish Council would respectfully request a condition that no above or below ground work should commence until the applicant has submitted complete and comprehensive calculations on surface water to the satisfaction of the LLFA.

Concern 6: SuDS attenuation

The proposed drainage strategy utilises an attenuation basin to balance the surge of runoff from extreme events. The basin is detailed as 650m³ but does not include calculations to support the claim. Calculations are available in the Weetwood report from 2020 but those calculations only include a 20% factor for climate change rather than the required 40%.

A cross check using the HR Wallingford UKSuDS tool with a 40% climate change factor and a more conservative Qbar rate suggest an appropriate size would be between 1000m³ and 1500m³ depending upon soil index used.

The Developer has not provided any information on consecutive events or overtopping mitigation in terms of an extraordinary event. It is usual for the LLFA to require calculations to show a 50% emptying profile in the 24 hours following an event.

Increasing the size of the attenuation basin would have an effect on the site layout and capacity. As such this area is considered worthy of further detailed study before the dwelling layout is approved.

The Planning Officer is invited to refuse the application on the basis that the surface water strategy has not been properly addressed. If the Planning Officer is minded to approve the application the Parish Council would respectfully request a condition that no above or below ground work should commence until the applicant has submitted complete and comprehensive calculations on surface water to the satisfaction of the LLFA.

Concern 7: Foul water

In the village of Stretton on Dunsmore foul water follows the line of fall throughout the village and gathers in a foul sewer along Brookside which feeds the pumping station behind the Old Shoulder of Mutton. From there it enters an underground chamber at the pumping station. Twin submerged pumps sit in the chamber. A primary (duty) pump and a secondary (standby). The pumps are rated to pump 15 litres a second (l/s) and are fairly modern. They pump the effluent via a 90mm diameter asbestos pipe to the junction of Plott Lane and Freeboard lane where it joins a gravity sewer flowing down to Ryton water treatment works. The outgoing pumped main is accepted to be undersized and subject to a plan for replacement.

In times of rain surface water infiltrates the sewer and adds to the quantity waiting to be pumped. Effectively more is coming in than going out so eventually the chamber fills and spills occur. Spills occurred on 198 days in 2022 which is of concern to Severn Trent Water and the residents.

Immediate mitigation is to pump out the chamber into tankers frequently to keep it empty. Further mitigation (such as reducing the surface water component) will be pursued over the next few months.

The Parish Council are aware that Severn Trent are not able to comment on the application on grounds of limited capacity purely on the ability to connect to its network. However in times of overflow foul water flows above ground in the centre of the village. In times of ecological crisis for our countryside and communities adding any amount to that load cannot be seen as sustainable or positive development. Local Plan policy D3 requires that developments should not overload local infrastructure.

The Planning Officer is invited to ask the Developer to provide written confirmation from the Severn Trent Asset Protection Team that they are aware of the development proposals and that the timing of the development will not exacerbate ecological problems or their ability to meet the government's spill target of less than ten per annum.

Concern 8: Construction Management Plan

The submitted Construction Management Plan is a very lean template. It does not contain site specific information. It does not contain any contact information, communication plan, allude to any community involvement or any off site traffic management.

The site at the top of Squires Road is unusually challenging to develop as it has a single entrance accessed through an existing, relatively narrow, housing estate road. Local residents have been accustomed to street parking and low traffic levels. Such traffic as there is tends to the domestic car and small van. HGVs are rare typified by the slow moving refuse collection truck. Failure to actively involve the residents of Squires Road and Roberts Close in the development of a construction management plan will be a likely source of tension.

The challenges of access extend to the wider road network. Access down Plott Lane from the west is single track and of limited visibility. Access from Finacre Lane is single track, narrow and unsuitable for HGV as it passes over Church Hill. Access from the B4455 via Knob Hill is unsuitable for HGV. Access from Brookside via the village centre is technically possible but frustrated by the 90° turn adjacent to the Post Office and should be avoided. Practical access is only afforded by travelling from the A45 south down School Lane, right into Plott Lane and right into Squires Road. The return trip would be the exact opposite. It is a narrow route at times and passes the school drop off area so should ideally not be used at peak times.

The Construction Management Plan does not mention a wider road access plan or traffic management routing. An associated document (21885-CMP-002) does show the location of some signage. However it is not clear that any policy would be in place, how this would be communicated to subcontractors and suppliers, or how it might be monitored and

enforced. Unless this is in place it is likely that drivers will follow SatNav directions and try to take the most direct route. Very quickly this will become a source of tension.

The signage document (21885-CMP-002) does not indicate any signage at the junction of Freeboard Lane with the A45 or Oxford Road. Once these points have been passed it is not possible for a HGV to turn. It does not indicate any signage at the junction of Finacre Lane and the Oxford Road. It does not show any signage at the junction of Knob Hill with the B4455 to dissuade traffic from the South entering the village by the first available route. Most importantly it does not indicate any signage for construction traffic leaving the site. This is of importance at the junction of Plott Lane and School Lane where the preferred route would be a left turn back to the A45. However the A45 is Westbound only at this point. It can be anticipated that drivers wishing to travel South, North or East will be tempted to try and return via the village centre. It is not clear from the topography of the junction that this is an unsuitable route. Suitable signage and good communication with suppliers is required to avoid this being a major source of tension between the Developer and the wider community.

The hours of work contemplated are excessive (07:00-18:00). A more reasonable expectation would be 08:00-17:00 with the understanding that staff may arrive and leave in time to operate those hours. Deliveries are scheduled for the same period with an hour quiet time in the morning and afternoon. These quiet times don't reflect local traffic loads. A morning quiet time of 08:00-09:00, and an afternoon period of 15:00-16:00, would be more appropriate given the school and work day. Some days of the week (usually Tuesdays and Wednesdays) the refuse truck will operate in Squires Road and Roberts Close between 07:30 and 09:00. During these times the roads are effectively blocked for anything other than cycles and small cars.

The connection to Foul and Surface water sewers involves considerable road excavation works in Squires Road affecting the access to 25 properties in Roberts Close and Squires Road. No information is provided on how domestic access will be maintained, the timing or the length of the works. No information has been offered on whether reinstatement will be temporary, permanent or whether the section of Squires Road will be resurfaced.

The Planning Officer is requested to add a condition to any planning consent for the site such that no underground or overground work shall start until a Construction Management Plan is fully developed and agreed with the community. Such agreement shall not be unreasonably withheld.

Concern 9: PRow safety

The development site contains a public footpath to the south of the site and it is not proposed to divert this. It is a small earthen footpath frequented by dog walkers and occasional ramblers. It does not currently have access to Squires Road.

The development will see the access opened up and the new spine road will cross the footpath at 90° as it transitions into the site. Vehicles leaving the development will have reasonable visibility of pedestrians. Vehicles travelling into the site have no pre-warning of

the footpath crossing as the current hedging and proposed landscaping do not give visibility splays. No signage to warn motorists is planned. No road markings, textures or other visible clues are planned.

Pedestrians using the footpath will transition from the unmade footpath to the spine road crossing without any warning. Their visibility to the South will be restricted by the existing property boundaries. No measures to indicate the crossing, or measures to divert the footpath away from the property line, and increase visibility, are planned.

The Planning Officer is invited to add a condition to any planning consent that the PRow routing should be actively managed and a safe route established in conjunction with the Warwickshire County Council's PRow Officer

Concern 10: Lack of continuity

The approach to the development site is via Squires Road and the two existing gateway properties (32 and 33 Squires). Both properties have established garden hedges abutting the site and are unlikely to wish to reduce them. Combined with the landscaping to the southern boundary of the site the aspect on approach becomes one of a formal entrance to the development. Almost on the lines of a gated community.

There is no smooth transition from the existing development in Squires Road to the new development. The house style and road layout is strikingly different. The PRow becomes enclosed by fencing and the general aspect of approach is visually unappealing.

The application does not mention, or take any heed of, policy NE2 on Green and Blue infrastructure. It does not provide and information to support the claim that there will be an overall biodiversity net gain.

The development proposal does not offer any shared space, community facilities, children's play areas or equipment and is not self contained but does present itself as different and rather foreboding to enter with no loop road or open aspect. The development cannot be said to improve or benefit the community or enhance the wider village setting.

The Planning Officer is invited to refuse the application on the grounds that it does not enhance the community as a whole, it does seek to divide the community and it does not have a cohesive layout contrary to the NPPF p20 and SDC1 10.9.

Previous applications

An earlier application for 47 dwellings on the same site (R13/250) was refused in 2014 largely on the grounds that the site was located in the Green Belt. In the refusal notice the Planning Officer wrote-

“Although there are some facilities in Stretton on Dunsmore residents of the proposed development would travel outside of the village to access facilities such as secondary schools, employment and leisure facilities. The village is served by a bus service to Coventry and Rugby, however this is a 2 hourly service which is only operational between 7.20am and 6.30pm.

It is therefore considered that residents of the proposed development will rely heavily on transport by private car and as such the development cannot be considered to be in a sustainable location.

It is considered that the proposal to develop up to 47 dwellings on the site will have a detrimental impact on the character of the area and visual amenity. Although there is existing development to the south and east of the site it is considered that the proposed development would be visible from land in the surrounding area, such as the Public Rights of Way to the north and west of the site and within the site itself and surrounding roads. In many cases the site will be seen from rural view points, such as nearby roads and Rights of Way and the development will therefore have an urbanising effect.

The development will therefore have a detrimental impact on the visual amenity and character of the area contrary to policy CS16, saved policy GP2 and the NPPF.

Policy CS16 states that development should not harm the amenity of existing or future occupiers and local residents have raised objections related to loss of light and privacy and increased noise and disturbance.”

The Rugby Local Plan removed the site from the Green Belt and allocated it for development but the comments in refusal R13/250 are still largely valid.

On Behalf of Stretton on Dunsmore Parish Council,

Kind Regards,



Mrs Helen Stewart

Parish Clerk and RFO