

Rugby Borough Local Plan 2045

Preferred Option Consultation Document May 2025

Clifton upon Dunsmore Parish Council Response

1. BACKGROUND

Clifton upon Dunsmore Parish Council (Clifton or 'The' Parish Council) represents the wards of Clifton upon Dunsmore, Hillmorton Locks and Houlton. With Houlton the 2021 Census gives a population of 2,991 – a growth of 130% (1,689) since 2011 (1304). Houlton has already doubled the Parish's housing stock adding 1,269 dwellings out of the 6,200 homes to be built by 2032. This has brought forward some flats and terraced homes, but the overall development has favoured larger homes with detached and semi-detached dwellings currently forming three quarters of the total stock. The housing stock in Clifton Village is also dominated by larger detached and semi-detached homes with smaller proportions of terraces and flats making it difficult for first time buyers and young families.

Delivering smaller to medium housing, such as 2–3-bedroom terraces, may offer an appropriately affordable choice for young families and smaller flats (e.g. 1 bedroom) would also help accommodate young people seeking more affordable options as well as bungalows which must form part of planning for any development in the area.

The Parish Council would like to redress this imbalance. In 2022 the Parish Council with members of the community started the process to develop a draft Neighbourhood Plan which runs from 2011 – 2031 and aligns to the current RBC Local Plan.

The Parish Council would like to see the village capable of supporting people from their childhood into their retirement.

2. INTRODUCTION

The Parish Council would like to submit the following comments as parts of the Preferred Options Regulation 18 consultation for the Draft Rugby Local Plan (2045). It is expected that these will be considered to develop the publication version of the plan. These comments will identify issues raised by the draft policies and the proposed allocations.

It should be noted that this consultation also coincides with the development of the Clifton upon Dunsmore Neighbourhood Plan, which is currently undergoing section 14 consultation. The Parish Council has an SLA with RBC to support the development of our Neighbourhood Plan by fulfilling certain statutory requirements and provision of appropriate advice and assistance. We feel that RBC has and continues to support that role.

Speculative developers are now also using this Local Plan Development time window to prepare significant planning applications for the land that was not included and are consulting with the Parish Council. We have added our opinion to these in this document.

We have, through our meetings and consultations, gathered an overall view which is expressed here. It may not align with every individual who may have put in an individual submission, and we fully acknowledge that an individuals' opinion matters and will reflect their own interests.

Overall, the Parish Council finds much to agree with in the Preferred Options document but will not comment on every item directly. Some areas also lie outside our areas of interest. The response therefore is based on such policies that are considered to impact on the parish specifically or at a broader level.

3. DRAFT POLICY S1 – SPATIAL STRATEGY

In terms of the key stated objectives of this plan the Parish Council feel that there is not sufficient consideration given to the use and development of existing (or the discovery of new) brownfield sites within the Rugby Urban District.

There is no meaningful allocation of housing to Rugby Centre within this draft Local Plan and brownfield land has been ignored. We would challenge that the plan does not follow RBCs overarching policy of: "Rugby urban area (ref C1 & C2) development first, followed by main rural and then other rural sites", one of the key objectives of RBC (#2 Ref page 6 of the Consultation Doc) is the revival of Rugby town centre. This was the basis of the strategy in the existing Local Plan.

Developing housing within an urban locale would further this aim and be more sustainable than distribution across rural localities. It would significantly impact upon the vitality of the centre of the town. Such brownfield site development stimulates the local economy and promotes the use of existing environmentally sustainable public transport, walking, use of bicycles etc.

The use of prime agricultural land, even though not designated greenbelt, appears wasteful to many constituents. Whilst appearing cost effective it hides the costs of much additional infrastructure and transportation costs or the hardships of further pressurising existing stretched infrastructure. The rejection of brownfield in preference to virgin sites is not environmentally sound. Discarding land that has been previously developed is the ultimate in disposability. Brownfield sites are usually centrally located and already have the advantage of existing infrastructure offsetting the cost of decontamination. RBC could take the high ground and insist that developers and society bare some of actual cost of frugal land use and not do it on the cheap. Land after all is a finite resource.

We also run the risk that distributed additional communities across the rural borough will necessitate the requirement to transport children to and from schools that are not in direct reach, either by private means or the use of publicly provided school transportation.

4. DRAFT POLICY S2 – STRATEGY FOR HOMES

4.1. PROPOSED 2045 END DATE

The Parish Council understands the NPPF promotes a minimum 15-year period for Local Plans, although a longer time can be used if strategic sites have been identified.

- In this case, no new strategic sites are proposed over and above the existing sites of Houlton, Southwest Rugby and Eden Park.
- These are already committed, delivering 8,434 homes by 2045.
- The strategic sites that have been identified within the Local Plan review are only a continuation of those from the already adopted Local Plan 2011 to 2031.

The latest Local Development Scheme (October 2024) indicates the Local Plan will be adopted by April 2027. A 15-year timescale would thus take this to 2042, reducing the overall build requirements in the plan by at least 3 years. The extension to 2045 in the current proposed plan is a divergence from NPPF guidelines and is not adequately justified.

With the current requirements for housing development having been set at 618/year in (Strategy for Homes S2 Para 1.4) an end date of 2042 would therefore reduce the overall housing requirement by 1854 houses (3 years x 618 Houses per year). As Houlton and Southwest Rugby are already in train to deliver the bulk of this requirement this could be prorated for rural locations to then take up the slack (identified in Draft Policy S6). For example, this is a 55% reduction in this requirement so Clifton upon Dunsmore would be asked for 70 new Homes (45% of 150).

Such a reduction would significantly lessen the impact on communities across the Rugby District and represent a win for the consultation process. This approach would be more consistent with the aims of the Draft Policy S1 in promoting sustainable sites. Proposing small sites adjacent to the urban area with more modest growth in the less sustainable main rural locations more closely aligns planning objectives.

We therefore strongly feel that a 2042 end date, with a reduced housing number would enable RBC to monitor delivery of the committed and allocated strategic sites in the urban area (Local Plan 2011-2031). Looking to more central brownfield sites would release the pressure of needing to deliver a less sustainable strategy of 'dispersed growth' in rural villages but with a 5% growth buffer rather than the 9% sufficiently prudent.

Clifton Parish Council would be willing to discuss a suitable location for housing growth within the village that could contribute to housing delivery in line with our aims and objectives outlined in our draft Neighbourhood plan and currently going through the Regulation 14 review.

The Draft Local Plans Draft Policy 2 aims to deliver 12,978 new homes (14,154 with a 9% buffer) between 2024 and 2045 and of which 150 are currently allocated in Clifton upon Dunsmore. This is a complete departure from the current 2011 – 2031 Local Plan where there is no housing requirement for Clifton upon Dunsmore village off the back of Houlton. The development of Houlton, which is 95% inside our parish, is right on the doorstep of the existing community who are anxious to maintain the distinctiveness of the village of Clifton. The community is of the firm belief that “we have done our bit” with 6000+ new houses right on our doorstep. Major encroachment adjacent to and inside the settlement boundary of Clifton Village erodes separation between Rugby and Houlton and borders conservation areas already established and cherished.

4.2. Housing Mix

The Housing Needs Assessment completed for our draft Neighbourhood Plan recognised that any new housing should meet the needs of young families and an ageing population, be affordable, sustainable and in keeping with the character of the village.

Draft Policy H1 states that the boroughs housing mix should reflect different tenures, types, and sizes to support a balance and inclusive community. It is anticipated that any development within Clifton upon Dunsmore would be committed to delivering these aspirations.

4.3. Clifton School

It is well known the key restriction for development in Clifton is the capacity of the village primary school. The village and school would not be able to accommodate a significant level of growth based on its sustainability score of 36 which is the 2nd lowest score of the main rural settlements (Wolvey being lower with 35). The school itself is landlocked and has no land to develop further, having already used part of the playground/car park for additional classrooms.

The school is operating at capacity now, so we find it hard to believe that any increase in demand can be met with the current school infrastructure. We would wish to see the modelling and assumptions associated with such a view that it can accommodate any increase.

Access to the school is on a busy road junction currently exacerbated by parking during drop off and pick up times. It is a big assumption that residents from a new development would walk their children to school when existing evidence and numerous reports to the police show that cars will always be the preferred option.

5. DRAFT POLICY S3 STRATEGY FOR EMPLOYMENT LAND

Clifton Parish Council supports the development required to establish employment land but would like to add the stipulation that if structures are to be constructed these cannot be

done so with the addition of solar panels. As a specific instance to tie back to CL1 Net Zero & CL2 - Renewable Energy.

It seems nonsensical to be allocating prime farmland both now and in the future to solar farms when there is hectare upon hectare of open unused warehouse roofing space available for this purpose across the employment zones in Rugby. Not only should a building be net Zero in its operation but should contribute to the grid where there is scale to do so.

6. DRAFT POLICY S5 - COUNTRYSIDE PROTECTION

It's not clear from this and other supporting documentation that National Green Belt policy (S5 C and Para 1.15) is being adopted as it appears that Greenbelt is being allocated for development.

This policy should include an additional protection of prime agricultural land and look to establish and maintain a clear green separation between rural locations, strategic development sites and urban Rugby.

7. DRAFT POLICY S6 – RESIDENTIAL ALLOCATIONS

7.1. Village Environment

Should these sites be adopted within the plan Clifton Parish Council would want to see a mix of housing that reflects the village itself. Draft design guidelines are available within the current draft neighbourhood plan that helps in this respect and the Parish Council would be willing to share these with RBC.

The village does not conform to a single style of dwelling having grown organically through a mixture of houses over an extended period. A single style of development would not be appropriate which is reflected in Draft Policy D1 well-designed places.

The village is restricted to 20mph, and it is expected that all developments would be accordingly restricted.

Additional development would put pressure on the already stretched infrastructure. In terms of sustainability there are issues with the road network and the infrastructure within the village.

On-road parking also presents problems for homes that do not have access to driveways or don't use them. North Road and South Road are effectively one way due to such parking. Similarly, Church Street and Lilbourne Roads are bottlenecks as there is no off-road parking. Parking on Main Street also restricts traffic flow.

It's important that future transport modelling in relation to additional housing needs includes the impact of the increased number of vehicles, the impact on off road car parking

and the impacts on the increased flow of traffic especially on roads already congested and sometimes inaccessible.

The village has poor public transport links, poorly used, with only one bus (no 9) going into Rugby approximately once an hour.

With Clifton upon Dunsmore being on top of a hill, cycling as an option is limited to the enthusiast and the continually active. There is no safe walking route from the village to the town, with a narrow bridge on the main road to be navigated, and the necessity to cross the main road on a corner, after a hill, which obscures the view of oncoming traffic.

7.2. Allocated Sites

In the draft Local Plan Policy S6 shows 3 sites allocated in Clifton upon Dunsmore:

- **Site 129** - Land off Lilbourne Road [60 houses]
- **Site 307** - North Road [10 houses]
- **Site 202** - Newton Road [80 houses]

7.2.1. Site 129 – Lilbourne Road, 60 houses

This site is adjacent to one of the key features of the village, the outstanding properties of the Old Manor (Grade 2 Listed) adjacent to the old duck pond site at the junction of Lilbourne Road and Hillmorton Lane which is within the Conservation area.

The inclusion of this development stops the Old Manor being the gateway to the village and significantly detracts from the character of this old and picturesque junction.

Access onto Lilbourn Road is problematic for this development on already badly paved road with no current footpath linking it to the village. The road is susceptible to surface water and flooding being badly drained. The road is already restricted to 20, 30 and then 40mph due to its narrowness and soft verges.

Buckwell Lane, is a small county lane and unsuitable for any increase in traffic.

The Parish Council does not support this allocation.

7.2.2. Site 307 - North Road, 10 houses

The access to the site is highly problematic as the only viable place would be at the corner of North Road but the only access available would be through the existing narrow farmers' gate.

Should this be at all feasible there is still the problem of traffic on North Road being very tidal with drop off and pick-ups at the school creating significant traffic congestion. North Road is a narrow road that has shown to be almost impassable when building work has been conducted, due to deliveries and contractor parking. This is likely to continue for several years.

The Parish Council does not support this allocation.

7.2.3. Site 202 - Newton Road [80 houses]

Whilst the Parish Council may consider that this has the lowest impact should it go forward, we still have reservations. Access onto Newton Road would allow traffic to leave the village without having to go through the centre however significant volumes would still transit through to Rugby. The we note 80 houses are allocated but does not account for a necessary increase in recreational play areas as this site is not close to the existing playing fields. (Appendix 2 Open Space Standards – Page 82 Ref 4). Were this site to be adopted we propose the provision of a play park as an essential as part of the development. This would reduce the number of houses on this site which may not be seen as cost effective.

Any new houses may not be visible from the village centre if Manor Lane provides screening. On the maps so far provided we do not see that Manor Lane is preserved. It is therefore essential to any development that trees and the Manor Lane green corridor are preserved and even extended under (Draft Policy EN5).

Should this site be adopted we would also require 30% affordable houses as well as bungalows within any proposal which would align with our draft Neighbourhood Plan and provides reasonable growth that can be sustained.

It is important to maintain the farm/ wooded coppice landscape approach to Clifton Village coming up the hill from Newton. The “upon” in Clifton upon Dunsmore signifies that the village straddles a hilltop and the Parish Council consider that this appearance should always be preserved.

The Parish Council does not support this allocation as it stands.

8. SPECULATIVE DEVELOPMENT

During consultation regarding the Neighbourhood Plan the Parish Council raised concerns regarding non allocated Sites with RBC planners.

8.1. Non-Allocated Site 335 land off Rugby Road

Within the Sustainability Appraisal (SA) page 29 the land off Rugby Road would initially create 150 homes (site 335). We understand that this has not been rejected by RBC and is still seen to have some viability. The developers Richborough/Marrons are consulting with Clifton Parish Council and seek to organise a local community consultation 21st May. We note that this might be considered by RBC as a preferred option to the 3 sites within the Local Plan, as a planning application is expected to be submitted early summer for Phase 1. We feel that this could trigger further applications for the additional 2 phases creating a strategic development of 700 new homes in total.

The study ranks the sustainability of rural settlements based on their access to services and facilities, public transport, and the internet. Clifton upon Dunsmore currently has a sustainability score of 36, which is based solely on the 150 homes on the 3 sites. If, however,

Phase 1 of the land off Rugby Road is approved, then Clifton would not be able to sustain the number of dwellings proposed.

Whilst RBC is advocating 'net zero housing' (Draft Policy CL1) a development of this size even if it's phased, is a 'strategic development' in hiding. The development would create over 1400+ additional cars which would generate additional trips through the village and increasing carbon dioxide emissions. How would this contribute to Draft Policy EN8 improving air quality when not all the cars will be electric?

The Rural Sustainability Study (December 2024) shows that Clifton upon Dunsmore has 421 dwellings. The remaining new homes proposed for Phases 2 and 3 would change the character of the village completely. This would destroy Clifton as an entity and a village community becoming a suburb of Greater Rugby & Houlton.

The Parish Council would not support such an allocation in the future.

8.2. Non-Allocated Site 83 land south of Lilbourne Road

We are also aware of Site 83 land south of Lilbourne Road which could create up to 180 houses. Whilst this is not currently developable and not in the Local Plan it remains a concern for the Parish Council regarding future speculative developments. This would be unsustainable within the settlement boundary.

The Parish Council would not support such an allocation in the future.

We look forward to your response to all the above.

Signed by the whole of [REDACTED]

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