

Rugby Borough Council Local Plan

Representations to Preferred Options Consultation

ON BEHALF OF MACKENZIE MILLER HOMES

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1. Introduction

- 1.1 Mackenzie Miller Homes (hereafter "MMH") control land south of Lilbourne Road on the eastern edge of Clifton upon Dunsmore ("the Site"). The Site has been previously promoted and submitted to the Call for Sites exercise and representations were made the Rugby Borough Local Plan Issues and Options Consultation in October 2023.
- 1.2 Enclosed with this representation is a Vision Document (Appendix 1) which sets out a clear vision for the Site, providing more detail on the proposals and its wider context, confirming the Site as a sustainable location for growth. However, in brief terms the Site is capable of delivering approximately 180 dwellings and will make provision for an extensive network of Green Infrastructure including a central public open space/common. The Site will support the Vision and Objectives of the emerging Local Plan and Neighbourhood Plan principles and can help to ensure that the market and affordable needs of the area are sustainably met.
- 1.3 MMH, as a small-medium sized housebuilder (SME) delivering very high quality housing, envisage building out the Site which would result in quicker delivery and certainty on design quality
- 1.4 The representations follow the structure of the Regulation 18 Preferred Options Consultation Document, providing responses under the topics as relevant.

About Mackenzie Miller Homes

- 1.5 Founded in 2015, MMH is a privately-owned small-medium sized housebuilder and land promotion company based in Warwickshire. MMH has a strong track-record for delivering sites across the country, with a particular focus on the Cotswold National Landscape and surrounding Local Planning Authorities. Responding to the rigour of development within a protected landscape has given them an excellent platform to ensure quality design and appreciation of landscape is a central tenet of all of their schemes ensuring they respond attentively to the needs of the people in these communities.
- 1.6 MMH success are measured by three core principles:
 - 1. Residents First: Meticulous attention to detail and market-leading design are at the heart of every Mackenzie Miller home.
 - 2. Community Focused: We enhance the villages and towns we work in by creating welcoming spaces that encourage interaction and foster new relationships. Landscape design is central to our developments, creating shared spaces for residents and the wider community.
 - 3. Climate Conscious: We recognise the critical role of sustainable design in addressing the climate emergency. Our homes feature a fabric-first approach and integrate new technologies to deliver low carbon and net-zero ready living. This commitment extends to our landscape design and the delivery of positive biodiversity net gain.

2. Objectives

- 2.1 MMH support the Plan's objectives which determine how development will be delivered. MMH proposals for the Site are considered against relevant principles to demonstrate how development can help achieve these.
- 2.2 <u>Reduce emissions and adapt to climate change</u> The proposed development at the site will contribute to a low carbon and climate resilient development from construction to occupation through sustainable materials and construction techniques, renewable energy measures, sustainable drainage systems within a comprehensive bluegreen infrastructure network and mobility strategy.
- 2.3 Moreover, it is considered that the Site can contribute to reducing emissions and adapting to climate change through:
 - Creation of critical mass to allow good levels of internal living and enhancing existing communities;
 - Making use of the excellent existing facilities for travel choice into Clifton and Rugby Town by active travel modes;
 - Placing cycling and walking at the highest priority, followed by public transport;
 - Proposing improvements to public transport infrastructure;
 - Providing future proofed development which is adaptable to meet the demands of electric and/or hydrogen vehicles;
 - Promoting local living and 15-minute neighbourhoods where people can meet their everyday needs within a short walk or cycle;
- 2.4 Raise design standards Development at the site will provide for a mix of housing types and tenures to encourage diverse and intergenerational communities; it will deliver both physical and social infrastructure to benefit existing and future residents and support the growth of the village as a whole; create homes with gardens that combine the best of town and country to create healthy communities; and, where possible, retain, restore and enhance existing landscape features including hedgerows and the tree-lined avenue. As set out in the introduction, MMH are a SME Housebuilder who specialises in building high quality homes, as evidenced by their work in Warwickshire and the Cotswolds.
- 2.5 <u>Deliver infrastructure-led growth</u> The Site can come forward without the need for infrastructure improvements. However, MMH would be committed to contribute toward delivering infrastructure upgrades, if required, through planning obligations.
- 2.1 Facilitate a greener, more biodiverse borough and deliver new country parks The Site is dominated by arable land, with native hedgerows along the site boundaries. Mature, individual trees are located across the site. The arable land has little ecological value and all trees and the majority of hedgerows are to be retained. The conceptual framework for the Site, as set out within the Vision Document, shows the retention and restoration of existing and historic landscape features including hedgerows and tree-lined avenues. In addition, the proposals will delivery significant open space, above policy requirements, to deliver a useable and significant village green to integrate the existing village with the proposed development, and beyond, a partial reinstatement of the parkland setting associated with Clifton Hall. This will deliver at least the regulatory biodiversity net gain.

3. Strategy

Policy S1 Settlement Hierarchy

- 3.1 Policy S1 sets out how housing and economic development will be distributed across Rugby Borough in accordance with the Settlement Hierarchy, principally focussed within the Rugby urban area.
- 3.2 MMH support Policy S1 as currently drafted noting Clifton upon Dunsmore is both a Main Rural Settlement (and therefore second to only Rugby Town in the settlement hierarchy) and importantly well related spatially and in terms of access to facilities, to Rugby. Whilst not 'within the rugby urban area' the village, due to proximity, can easily access the town's jobs, facilities and community infrastructure, including schools and colleges.

Policy S2 Strategy for Homes

Housing Requirements

- 3.3 MMH are encouraged to see Policy S2 plan for 14,134 new homes to be delivered within the plan period 2024-2045 which is approximately 10% higher than the Local Housing Need (LHN), however it is considered that it does not go far enough.
- 3.4 Paragraph 61 of the National Planning Policy Framework states that "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."
- 3.5 Housing affordability is an ongoing and increasing pressure which will require a proactive approach to address therefore it is considered that the Council should be more aspirational and plan for more homes. The 2023/24 Annual Monitoring Report ("AMR") for Rugby confirms that just 165 affordable homes were completed.
- 3.6 The affordable housing need identified in the Table 8.13 of the Housing and Economic Development Needs Assessment (HEDNA) is 407 dwellings per annum. When this is compared to the Council's selected housing requirement in the Local Plan Review of 673 dwellings per annum, affordable housing need would equate to 60% of the housing requirement. The selected housing requirement will quite clearly result in a significant level of unmet affordable housing need that will not be delivered if the Local Plan Review proceeds in its current form, particularly considering the Council are nowhere near delivering what is required based on their AMR's.
- 3.7 The only way to truly address affordability crises' and to seek to eat away at the identified affordable housing need is to plan for the delivery of more housing across the borough which will in turn deliver a greater quantum of affordable housing.
- 3.8 The decline in the delivery of affordable housing further confirms the importance of providing the sufficient type and amount of dwellings to meet housing need. The NPPF states, at paragraph 63:
 - "Within this context of establishing need, the size, type and tenure or housing needed for different groups in the community should be assessed and reflected in planning policies..."
- 3.9 It is for the above reasons that MMH consider that the Council, despite not being required to so, should be a flag bearer for addressing the housing crisis and therefore should be planning for more homes.

Unmet Needs

- 3.10 Whilst it is acknowledged that at this time it is difficult to identify the exact levels of unmet need from neighbouring area, it is important that Policy S2 accounts for the potential unmet needs which may arise in the future from Coventry. Coventry City Council's Local Plan Review proposes to meet its housing requirement of 1,455 dwellings per annum within its administrative boundaries. However, this fails to acknowledge the requirement for family housing as a result of recent delivery in Coventry focussing on smaller units in urban locations and Purpose-Built Student Accommodation. The HEDNA upon which Coventry bases its housing requirement sets out that Coventry's need is clearly for family-sized accommodation across all tenures with 35%-45% of need for 2 and 3 bedroom dwellings, with the highest need being for affordable home ownership of 2 bedroom dwellings.
- 3.11 Land resources in Coventry are finite, and affordability is worsening due to a declining rate of delivery of affordable housing. The HEDNA outlines that affordable housing need for Coventry is 1,887 dwellings per annum, equating to 129% of Coventry's selected housing requirement in the Local Plan Review. By contrast, recent delivery of affordable housing is extremely low with only 181 affordable homes delivered in 2023/24 according to Coventry's latest Annual Monitoring Report, with similar numbers delivered in the preceding monitoring years and never breaching 500 delivered affordable units which falls considerably short of their affordable housing need (1,887 dwellings per annum).
- 3.12 Coventry's aspiration to deliver its housing requirement within the City will further constrain the type of housing that can viably and feasibly be delivered therefore placing greater importance on the need for Coventry to look to sustainable sites capable of delivering family housing, such as SG01 South of Coventry, which can deliver both market and affordable housing. This will require both Coventry City Council and Rugby Borough Council to work collaboratively under the Duty to Cooperate.

Plan Period

3.13 MMH are supportive of the chosen plan period, the approach to planning for a longer period than the minimum required by the National Planning Policy Framework (NPPF) will enable a more cohesive growth strategy to be prepared ensuring that large scale development has a better chance of delivering the housing and employment growth required for Rugby Borough as set out within paragraph 77 of the NPPF which states:

"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed..."

Policy S6 Residential Allocations

Distribution of Development

- 3.14 MMH have serious concerns regarding the Council's strategy in distributing residential development across the borough. The Council are currently proposing to allocate a significant amount of land at Main Rural Settlements which would require release of Green Belt land. The NPPF sets out at paragraph 145 that '... Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced through the preparation or updating of plans.'
- 3.15 For plan-makers to reach a point where exceptional circumstances can be demonstrated, paragraph 146 confirms that this can include '...instances where an authority cannot meet its identified need for homes, commercial or other development through other means'.

- 3.16 And at paragraph 147 'Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.'
- 3.17 This assessment of whether all other reasonable options have been examined will need to take account of NPPF paragraph 147:
 - "a) makes as much use as possible of suitable brownfield sites and underutilised land;
 - b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
 - c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground."
- 3.18 The NPPF clearly sets out a sequential approach to allocating land for development within the Green Belt essentially dictating that utilising Green Belt land should be a 'last resort', where there are no other options to accommodate the required growth. MMH consider the sequential approach to be particularly relevant given the availability of land sustainably located land outside the Green Belt, such as in Clifton upon Dunsmore and specifically MMH's Site.
- 3.19 MMH would question whether the Council has taken all reasonable options into account. Clifton upon Dunsmore, unlike the other Main Rural Settlements, is not constrained by the Green Belt. It is noted that Wolvey (710 dwellings), Brinklow (415 dwellings), Long Lawford (400 dwellings) and Stretton on Dunsmore (168 dwellings) are currently planning for higher growth than Clifton upon Dunsmore all of these settlements are within the Green Belt. There therefore needs to be a compelling planning justification as to why appropriate sites situated within non Green Belt locations have been discounted in order to demonstrate 'exceptional circumstances'. This has not been demonstrated within the available evidence base and as set out in these representations, the MMH proposal can deliver significant housing at a Main Rural Settlement without impacting on major constraints. Furthermore, the location, immediately adjacent to Rugby Town, provides the most sustainable location for growth outside of the principal settlement
- 3.20 The Councils spatial strategy insofar as the Main Rural Settlements are concerned, appears to have been influenced by the existing primary school capacity at these villages as indicated in the Interim Sustainability Appraisal (SA). For Clifton upon Dunsmore Primary School this was adjudged to be 150 dwellings citing its inability to expand. It is considered that the Council's spatial strategy and interim SA fails to take into account Clifton upon Dunsmore is extremely well linked to nearby Rugby Town. Within 5km there are six primary schools which are all accessible in under 10 minutes by automobile. It would also be reasonable and entirely possible to improve school public transport options so that pupils would not have to rely on the private car. It is not uncommon for pupils living in villages to use bus services to get to and from school.
- 3.21 Alternatively, it is considered entirely feasible that the Council could identify additional land for a new primary school as part of a wider village growth strategy with contributions sought from allocations secured through appropriately worded planning policy. An Infrastructure Delivery Plan could be produced which sets out clearly how the school would be funded and timeline for delivery. The interim SA indicates that to achieve this would require a single large site however it is well established that a collection of sites, such as those promoted within Clifton upon Dunsmore, could collectively deliver necessary infrastructure. A pro-active strategy, working with site promotors, to optimise the opportunity for growth at this non Green Belt Main Rural Settlement, has not been considered or undertaken –

- the council has simply decided to discount further growth without properly exploring in more detail the options for delivering education infrastructure. In summary, the Council is discounting growth on a technical issue that can be resolved and has prioritised this over national planning policy constraints the Green Belt. In our view this represents a major flaw in the Council's approach which seriously threatens the soundness of the Local Plan.
- 3.22 Overall, Clifton upon Dunsmore, by virtue of being unconstrained by the Green Belt should be accommodating a higher level of growth given the availability of suitable and sustainable sites at the settlement. The Council's current approach in identifying a large quantum of growth at other Main Rural Settlements within the Green Belt runs completely counter to the sequential approach set out within the NPPF. It is for this reason that the current distribution of development strategy is unsound.

Site Credentials

- 3.23 It is acknowledged that the Council assessed the Site within their Stage 2 Assessments under reference 83, however the reasoning for not progressing the Site is considered flawed, particularly in the context of the sequential approach. The Council acknowledge that the Site is accessible and is walkable to nearby services and facilities, there are no ecological constraints and it is not located within the Green Belt. The assessment cites concerns regarding heritage and landscape.
- 3.24 MMH have since undertaken technical work, which has informed the approach to the masterplan. It is through this evolution that MMH consider development can come forward in a sustainable and sensitive manner.
- 3.25 Regarding heritage, it should be noted that the Council's Heritage Assessment acknowledges that impacts could be mitigated through high quality design. The emerging design approach, as set out within the Vision Document, positively responds to heritage sensitivities in the following ways to mitigate the impact of the development on their respective significance:
 - The existing green immediately to the west of the Site is extended to form an area of open space using a traditional, familiar form to create a communal area of open space which maintains the experience of a rural backdrop to views from these heritage assets and deliver an attractive gateway entrance to the village.
 - The extended village green transitions further to the east to adopt a more parkland character, restoring elements of the previous historic landscape which once existed within this view, including the tree avenue which is embedded as an important green corridor through the scheme.
 - The northern edge of the built development adopts a gentle building line which would be softened further
 by planting along the road frontage addressing the transition between the Conservation Area and its wider
 surroundings.
- 3.26 In terms of landscape impact, MMH note that Land to the north Lilbourne Road have been identified as a draft allocation under site reference 129. Should this draft allocation come forward, it would significantly alter and erode the existing rural setting. The delivery of MMH's Site would represent a logical rounding off of this part of Clifton upon Dunsmore and represent a 'book end' to the village. Notwithstanding, the Dunsmore Plateau Fringe is considered to be of moderate sensitivity which when compared with the landscape sensitivity of other Main Rural Settlements is less sensitive.
- 3.1 In terms of ecology, the Site is dominated by arable land, with native hedgerows along the site boundaries. Mature, individual trees were located across the site. The arable land has little ecological value and all trees and the majority

- of hedgerows are to be retained. The Site can be developed whilst delivering at least a 10% net gain of biodiversity in accordance with the requirements of the Environment Act.
- 3.1 Insofar as sustainability of the Site is concerned, it is well connected to services and facilities. There are education, retail, food & beverage, healthcare and leisure amenities within acceptable walking distances of the site and desirable cycling distances. The site is well connected with respect to the local bus services which route via Main Street in the centre of Clifton upon Dunsmore, providing services between Lilbourne and Rugby. The closest bus stop to the site is located approximately 380m from the site, reachable via a 5-minute walk. The closest railway station to the site is Rugby Station which is located c.2.5km west of the proposed development and provides frequent services to key destinations including Birmingham, London, Milton Keynes, Manchester and Crewe.
- 3.2 Based on Environment Agency data, the whole of the site lies in flood zone 1. Land in flood zone 1 has a low probability of flooding. This means in any year land has a less than 0.1% chance of flooding from rivers or the sea.
- 3.3 Overall, the Site is considered to be located within a sustainable location relatively free of constraint therefore it is considered to be sequentially preferable to draft allocations at the other Main Rural Settlements which require the release of Green Belt land. The Council acknowledge the Site is sustainable with a lack of constraints therefore MMH consider that it should be included as a draft allocation within the emerging local plan.

4. Climate

Policy CL1 Net Zero Buildings

- 4.1 MMH understand the importance of planning for net zero carbon development as part of the broader objective to address climate change. However there is significant concern regarding the approach set out by Policy Direction CL1, which outlines the potential for the emerging local plan to go beyond the requirements of Building Regulations.
- 4.2 The Government's approach to this is clear, and as set out in a Written Ministerial Statement (WMS) dated 13th December 2023, confirming that planning policies should not impose standards for energy performance that exceed the Code for Sustainable Homes Level 4, noting the Future Homes Standard (FHS) to be implemented in 2025.

4.3 The WMS outlined:

"the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations. The proliferation of multiple, local standards by local authority areas can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they do not have a well-reasoned and robustly costed rationale."

- 4.4 Requiring development to exceed the requirements of Building Regulations is likely to result in unnecessary complexity and additional costs for developers, threatening the viability of schemes and slowing down the ability of the industry to respond to and meet the housing and economic needs of the emerging local plan.
- 4.5 MMH therefore strongly urge the reconsideration of the approach set out in Policy CL1 and avoid divergence from the FHS as per the recommendations of the WMS. Any policy which goes beyond the FHS must be demonstrated to be viable and not hamper the delivery of development required to meet the emerging local plan requirements.

5. Environment

Policy EN5 Canopy Cover

5.1 MMH have concerns regarding the requirement for a minimum 20% tree canopy coverage on all major development outside of Rugby town centre. This figure appears have been derived from a 2023 Friend of the Earth Report which estimated that just 4.5% of Rugby Borough is woodland placing it in the bottom 20% of English authorities. The intention of Policy EN5 is to address this shortfall. However, further evidence is required to demonstrate how the policy can be implemented effectively and how the 20% coverage can be delivered alongside all other policy requirements. There may be a conflict between the objectives of this policy and the 10% biodiversity net gain requirement, which may be difficult to achieve in combination on some sites. The policy should be more flexible to ensure it can be assessed on a site-by-site basis.

6. Review of Evidence Base

Heritage Assessment

- 6.1 The Site has been assessed under reference 83 as part of the Council's heritage review to inform the emerging local plan. To summarise, the report states that mitigation would be possible however this would require a high standard of design and public benefits to justify the impact. The assessment lists possible mitigation measures and MMH are committed to delivering these. MMH produced a Heritage Appraisal to inform the emerging strategy for the development of the site, ensuring the heritage baseline was understood and responded to appropriately from the outset. Therefore, MMH have produced an indicative masterplan which is landscape and heritage led. The mitigation measures are listed below:
 - The masterplan avoids prominent elements of development in the northern elements of the site by maximising open space and green corridors. This preserves the rural views from the conservation area.
 - The masterplan takes a landscape led approach which reflects the historic development patterns. It proposes to restore and retain the tree-lined avenue reinstating the relationship between Clifton Hall Farm and The Old Hall.
 - Through sensitive design and the creation of traditional, familiar form of open space to create a communal area which maintains the experience of a rural backdrop to views from these heritage assets and delivers an attractive gateway entrance to the village.
 - Bespoke housing design, aligned to local precedent. MMH is committed to delivering a scheme which draws
 from guidance within the conservation area character appraisal. MMH are an SME housebuilder that
 specialises in premium homes across Warwickshire and the Cotswolds. Just recently they successfully
 obtained planning permission and built out a scheme in Leamington Spa at the heart of the Northumberland
 Road conservation area.
 - Pedestrian and cycle links will be created to improve connections into the historic settlement of Clifton upon Dunsmore, and into the wider historic landscape.
- 6.2 In view of the above, it is considered that a high standard of design can be achieved and through public heritage benefits such as restoring the tree lined avenue and implementing a functional village green, justify the heritage impact.

Interim Sustainability Appraisal

- 6.3 The Interim SA appraises different growth scenarios against the sustainability objective., It does not undertake detailed site specific assessments. It does however undertake an assessment of Clifton upon Dunsmore and the emerging preferred options. MMH consider the approach and conclusions reached in this respect to be flawed. To summarise, MMH do not consider that the sequential approach as per the NPPF has been undertaken which raises serious questions regarding the current preferred options.
- 6.4 Whilst the Interim SA acknowledges that there is a strategic case for growth as Clifton upon Dunsmore, being located outside of the Green Belt and well linked to Rugby (the principal urban area) it ostensibly refers to the fact that Clifton upon Dunsmore has a relatively low settlement score in terms of sustainability. However, Wolvey which is currently proposed to accommodate 700 dwellings is ranked lower in terms of sustainability (Rural Sustainability Study December 2024) and also located within the Green Belt. Sequentially it is clear that Clifton upon Dunsmore is more

suitable and sustainable for this level of growth. However, the Interim SA fails, in our view, to give proportionate weight to Green Belt land release. This would perhaps be understandable if the interim SA took a 'policy off' approach but this does not appear to be the case. In view of this, MMH consider that it is clear that if sustainable and achievable sites are available within Clifton upon Dunsmore then these should form part of the preferred options by virtue of not being constrained by the Green Belt.

- 6.5 As previously set out in section 3, it would appear that the SA endorses a spatial strategy which limits growth at the Main Rural Settlements to the capacity of the existing primary schools a constraint that can be overcome through positive planning. However, again this is considered a flawed and impractical approach to development. For Clifton upon Dunsmore Primary School this was adjudged to be 150 dwellings citing its inability to expand. It is considered that the interim SA fails to take into account Clifton upon Dunsmore is extremely well linked to nearby Rugby Town. Within 5km there are six primary schools which are all accessible in under 10 minutes by automobile. It would also be reasonable and entirely possible to improve school public transport options so that pupils would not have to rely on the private car. It is not uncommon for pupils living in villages to use bus services to get to and from school.
- 6.6 Moreover, the interim SA indicates that to provide a primary school would require a single large site, however as referenced earlier it is well established that a collection of sites, such as those promoted within Clifton upon Dunsmore, could deliver this infrastructure through appropriate allocations and policy securing contributions. Sequentially this would be preferable to releasing land from the Green Belt at other Main Rural Settlements which as outlined in the NPPF should be a last resort. It is considered entirely feasible that the Council could identify new land within Clifton upon Dunsmore for a new school / re-location of the existing Primary School which would allow them to expand and provide sufficient headroom capacity to accommodate additional pupils.
- 6.7 Overall, the approach and conclusions reached in the Interim SA are considered to be flawed. MMH do not consider that the sequential approach as per the NPPF has been undertaken which raises serious questions regarding the soundness of the current preferred options.

7. Sustainable Location for Development

- 7.1 Enclosed with this representation is a Vision Document (Appendix 1) which sets out a clear vision for the site, providing more detail on the proposals and its wider context. This Section provides a brief summary of the Vision document, confirming that the Site is a sustainable location for development:
 - The Site is sustainably located, adjacent to a Main Rural Settlement with excellent links to Rugby Town, in a
 location recognised by the Council as being suitable for further growth. The Site would form a logical
 extension to Clifton upon Dunsmore and alongside draft allocation 129 would represent a 'book end' to the
 village.
 - The Site can come forward in a way that would cause less than substantial harm to the significance of the Clifton upon Dunsmore Conservation Area and The Old Hall. This harm can be mitigated through the landscape led design approach and would include a number of specific heritage benefits.
 - MMH are an SME housebuilder and intend to build out the Site resulting in quicker delivery to high design specification.
 - The Site can deliver approximately 180 homes, making a significant contribution to the market and affordable housing needs of Rugby Borough.
 - The Site is accessible by a range of sustainable transport modes and can deliver improved pedestrian and cycle infrastructure.
 - The central open space 'village green' concept is considered a compelling narrative. Through integration with draft allocation 129 it could be fronted by development, creating a functional community asset for the whole village with wider links through to a new 'parkland' reminiscent of the historical use of the land prior to its current agricultural use. The role of this space will provide an excellent canvas for community involvement. This, alongside the tree-lined avenue, represents clear public benefits and a high standard of design that should give the Council comfort the Site is suitable for allocation and development.
 - The provision of an extensive green infrastructure network will ensure that green spaces will be accessible to existing and future residents, and provide a natural resource which the local area can benefit from. This Green Infrastructure network will also ensure a minimum 10% BNG is achieved on site.
- 7.2 An Illustrative Masterplan is included within the Vision Document which illustrates how the Site can come forward.

8. Conclusion

- 8.1 To conclude, the Site promoted by MMH is considered to have capacity to provide approximately 180 dwellings, this takes into consideration constraints and makes provision for an extensive network of Green Infrastructure including a village green, accessible open space and children's play area.
- 8.2 Whilst MMH are broadly supportive of the approach to the settlement hierarchy and number of homes planned for, there are serious concerns regarding the spatial strategy. Clifton upon Dunsmore, by virtue of being unconstrained by the Green Belt should be accommodating a higher level of growth given the availability of suitable and sustainable sites at the settlement. The Council's current approach in identifying a large quantum of growth at other Main Rural Settlements within the Green Belt runs completely counter to the sequential approach set out within the NPPF without any environmental or infrastructure constraint justification. It is for this reason that the current distribution of development strategy is unsound.
- 8.3 The Site is considered to be located within a sustainable location relatively free of constraint therefore it is considered to be sequentially preferable to draft allocations at Main Rural Settlements which require the release of Green Belt land.
- 8.4 MMH are a SME housebuilder and plan to build out the Site. Their track record of delivery will give the Council comfort that the Site can come forward early within the plan period to a high quality design specification representative of the current village character.
- 8.5 Overall, MMH consider that the Site should be included as a draft allocation the Councils emerging local plan.



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Executive Summary

This document has been prepared by IDP Architects on behalf of Mackenzie Miller Homes to demonstrate the potential for a new sustainable residential development comprising approximately 180 homes on the land situated to the east of Clifton Upon Dunsmore.

Quality Assurance

ISO 9001 & 14001 Registered Firm

IDP is a practice of Urban Designers, Chartered Architects, Chartered Landscape Architects and Chartered Architectural Technologists. The opinions expressed within this document are those of appropriate qualified professionals, whose professional judgement is relied upon.

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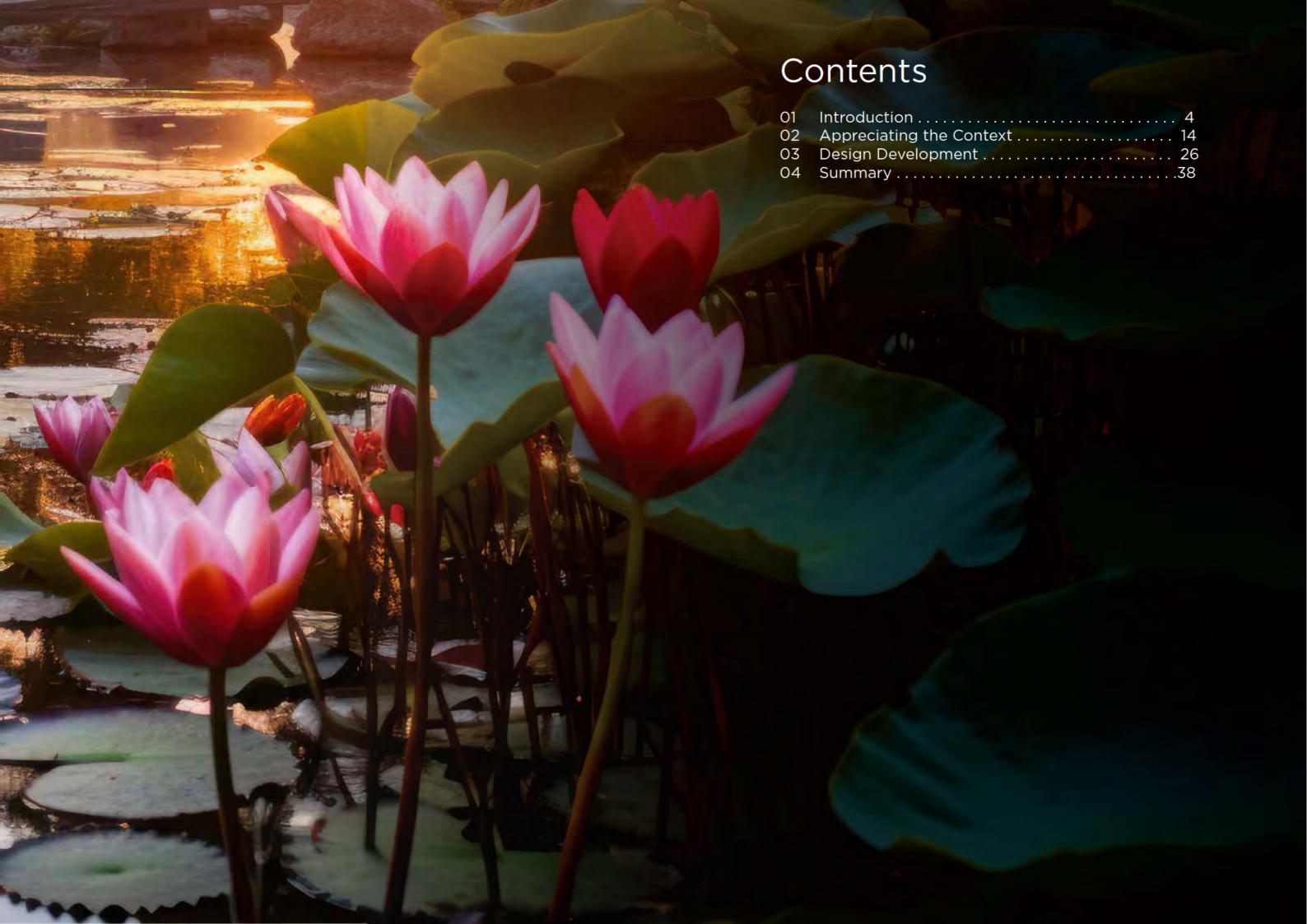
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Landscape Institute Registered Practice











01.01 Introduction

Purpose of this Document

This vision document has been prepared on behalf of Mackenzie Miller Homes to demonstrate how land south of Lilbourne Road, Clifton upon Dunsmore ('the site') can come forward.

In developing the proposals, Mackenzie Miller Homes have undertaken extensive due diligence to understand the constraints and opportunities for development. This ensures, the masterplan is robust, offering a clear picture of how the development could come forward and that key technical and planning matters are incorporated in the design and delivery strategy for the project.

This document will set out all key constraints to development, and how the design proposes to harness these as opportunities, to assist in the creation of an attractive, characterful and sustainable place where people will want to live.

The site is both available and achievable and would be a suitable location for sustainable residential led development located in close proximity to amenities in Clifton Upon Dunsmore.

Development Vision

Our vision for the land east of Clifton Upon Dunsmore is for the creation of a new high quality residential development that will provide a truly mixed community supporting older people, young people and families. The development will be sustainable and distinctive yet sensitive to its landscape setting proximity to existing residents and the nearby Clifton village centre.

Key principles include:

- A landscape led design promoting best practice urban design place making principles and sustainability through retention and extensive enhancement of existing green infrastructure, ecology and biodiversity.
- Provision of connectivity routes into the wider area to promote active travel throughout the new neighbourhood and into the existing settlement.
- The retention of existing mature trees to retain ecological and character benefits to the site.
- The creation of new open space in the north-west corner of the site to benefit the wider community.
- To take influence from the established pattern of built form and architecture of Clifton Upon Dunsmore, to form a sensitive addition to the settlement.
- Providing a range of new family homes offering a range of housing types and tenures ensuring a mixed, balanced and vibrant community is delivered to support local housing needs including homes for older people.
- A strong landscape structure providing a series of green spaces for both amenity and repose.
- A clear urban structure organised sensitively to shape and enhance views to and from landscaped site fringes.

Mackenzie Miller Homes have assembled a highly professional team, with established reputations for delivering high quality and deliverable development proposals, through decades of experience.

The team includes the following: -

Architecture & Urban Design: IDP

Landscape Planning

& Architecture: IDP

Planning: Nexus

Consulting Transportation

Engineer:

Mode

Ecology: Turnstone

Heritage Consultant: Marrons











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01.02 Mackenzie Miller Homes

About Mackenzie Miller Homes

Founded in 2015 by Managing Director Pete Mackenzie, Mackenzie Miller Homes is a privately-owned residential development and land promotion company based in Warwickshire. Mackenzie Miller Homes has a strong track-record for delivering strategic sites across the country, with a particular focus on the Cotswold National Landscape and surrounding Local Planning Authorities. Responding to the rigour of development within a protected landscape has given us an excellent platform to ensure quality design and appreciation of landscape is a central tenet of all of our schemes ensuring we respond attentively to the needs of the people in these communities.

The Mackenzie Miller Team comprises hand-picked individuals with a wide ranging skill set and experience in the UK property sector built up over decades. One facet which unites the team is their commitment to quality and thoughtful design which permeates every aspect of our work. As we expanded into land promotion, that vision extends to the positive impact our developments have on the communities we serve. We're a relationship-focused company, prioritising the happiness of our residents and design of our developments to help foster thriving communities. Our success is measured by three core principles:

- Residents First: Meticulous attention to detail and market-leading design are at the heart of every Mackenzie Miller home.
- Community Focused: We enhance the villages and towns we work in by creating welcoming spaces that encourage interaction and foster new relationships. Landscape design is central to our developments, creating shared spaces for residents and the wider community.
- Climate Conscious: We recognise the critical role of sustainable design in addressing the climate emergency. Our homes feature a fabric-first approach and integrate new technologies to deliver low carbon and net-zero ready living. This commitment extends to our landscape design and the delivery of positive biodiversity net gain.



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01.03 Site Location

Location Context

The site is located to the east of the established Additionally, the village contains numerous essential village of Clifton upon Dunsmore. The village lies approximately 1 Km north-east of the market town of school and play school. The village also benefts from Rugby in Warwickshire.

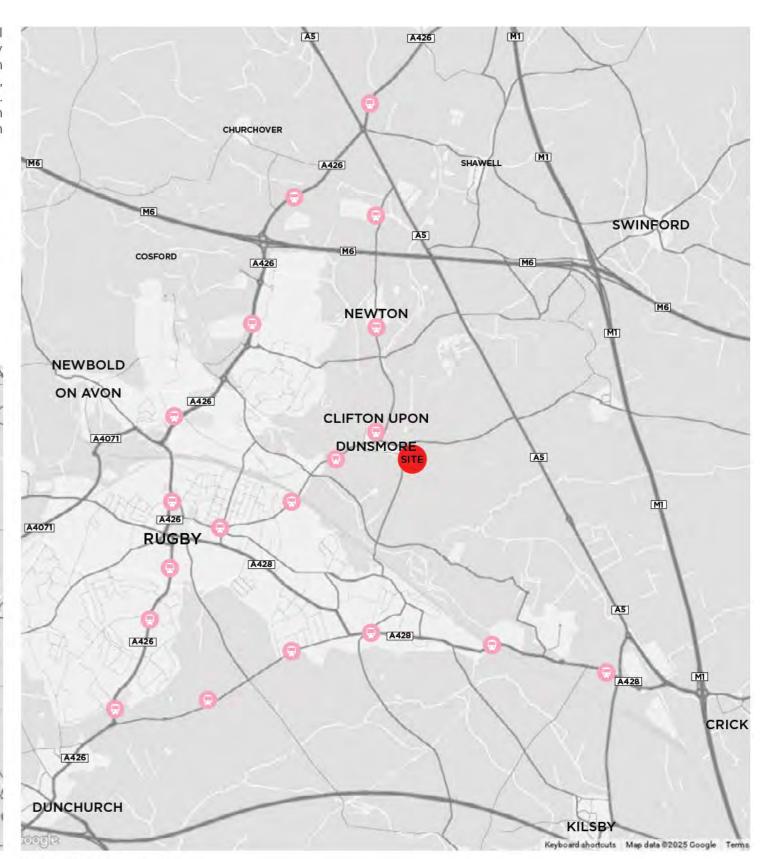
centre:

The location boasts excellent transport links, situated near Rugby's railway network and the A5 highway. Lilbourne Road has nearby bus stops connecting to Rugby, with the closest stop approximately 300 meters and a 5-minute walk from the site. Rugby Station, located approximately 4 kilometers to the south-west, provides frequent services to major cities such as Birmingham, London, and Manchester.

amenities including a Church of England Primary a range of retail and services including; Post Office, hair & beauty; a bakery; and The Bull Inn Public House. The site is well connected with respect to the village Local ficallities also include: - a Village Hall; Lawn Tennis Club; children's equipped play area and Clifton Village Football Pitch.



Regional Location Plan



Local Location Plan

01.04 The Site

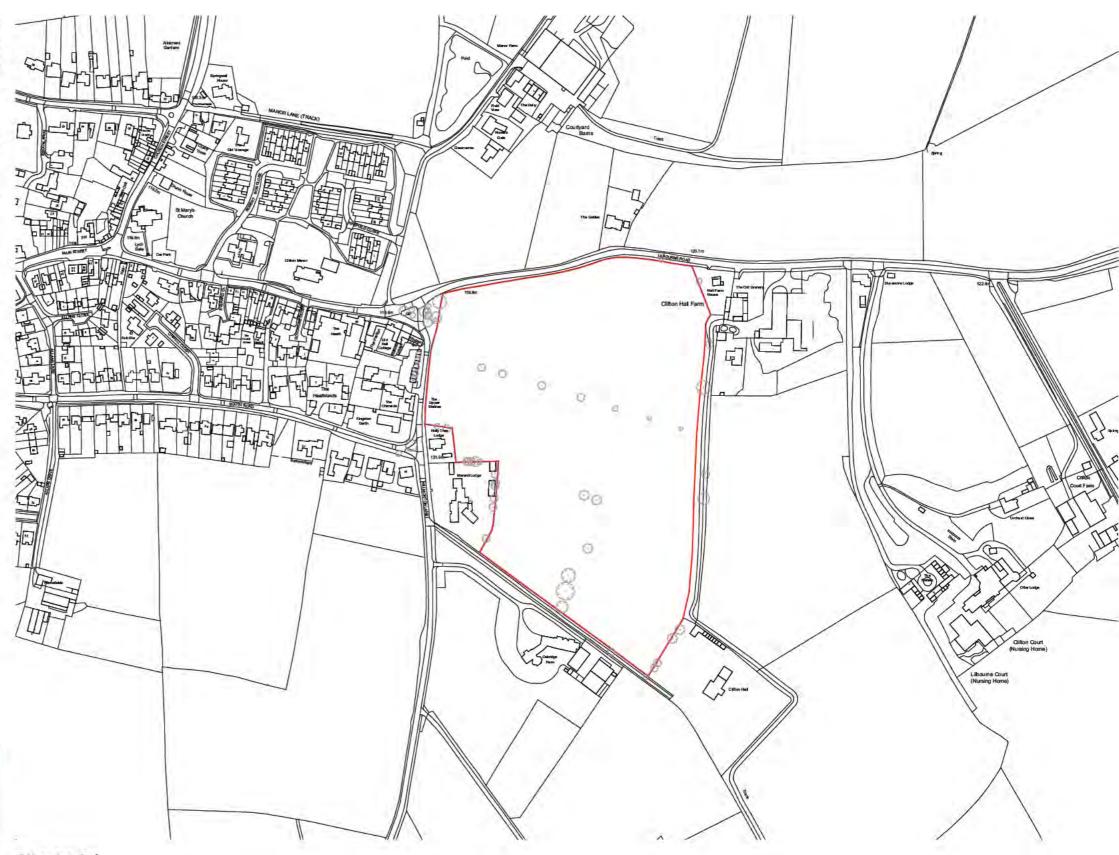
Site Description

The site occupies land at the point of convergence of Lilbourne Road and Hillmorton Lane. The site is currently laid out entirely as arable agricultural land and is bounded by hedgerows with adjacent residential development to the western side and a scattering of farms and dwellings to the south and east.

A T-shape arrangement of mature broad-leaf trees is located within the site, representing the line of former hedgerows now grubbed out.

The site is gently sloping with a general fall to the north-west corner of the site.

The site is bisected by an existing 'half-avenue' of trees which describe a former carriage route as part of an historic estate.





Site Aerial

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Site Planning Application Boundary (8.48 Hectares)

Site Aerial With Contours

01.05 Site Views

Site Description

The following photographs capture the key views of the site and its features. As is evident, the site contains a scattering of existing trees, but is otherwise dominated by its current arable agricultural use.

- View from existing site entrance off Lilbourne road facing west towards Clifton-upon-Dunsmore centre.
- View facing south looking at existing gated access point and large hedgerows that boarder the eastern edge of the site.
- View facing north looking at the buildings that neighbour Clifton Hall Farm.
- View of large trees that cross through the site.
- View from site looking towards the grade II listed old hall building that neighbours the site.











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- Panoramic view towards the west looking towards Clifton Village and the dense trees along Hillmorton lane.
- View facing west of two large and overgrown trees at the centre of the site .
- View from the site facing south east at a pathway that connects towards Clifton maynor.
- 9 Full site view from the southern area facing north towards Lilbourne road.



6.



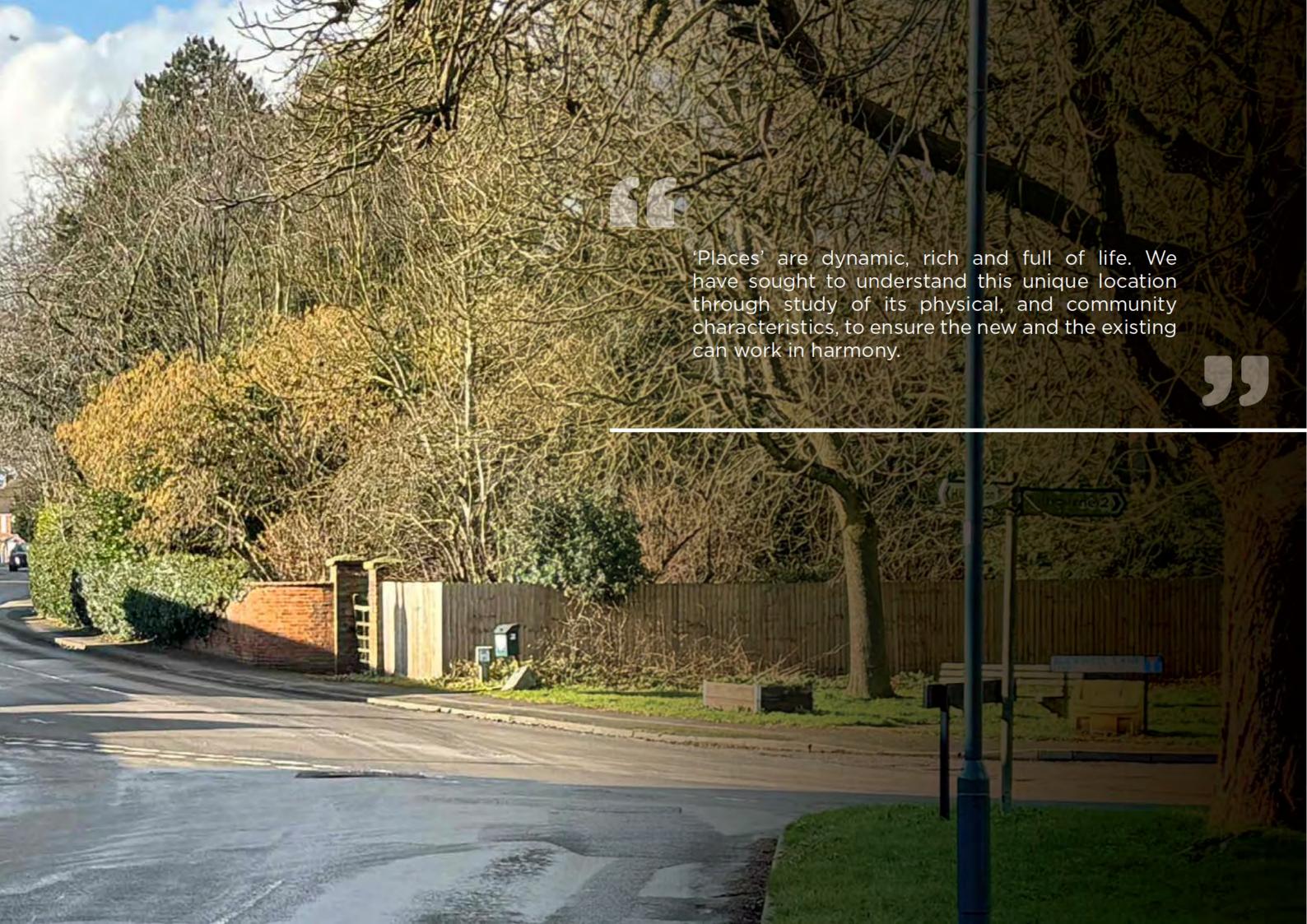




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02.01 Planning Context

Introduction

This section of the document discusses the key planning principles and context that have informed our proposals.

Planning Context

The site falls within the administrative area of Rugby Borough Council ("the Council"). The Council's development plan currently comprises the Rugby Local Plan 2011-2031 which was adopted in June 2019.

The Council is currently undertaking a review of its Local Plan, which will cover the period up until 2045. In terms of time-scales for the review, these are set out in the October 2024 Local Development Scheme. As at the time of publication of this Vision Document, the Council are currently consulting on their Preferred Option (Regulation 18).

Housing Need

The Vision Document is prepared on the basis of the emerging Rugby Local Plan and the commitment to accommodate 12,879 new dwellings by 2045. Policy S2 of the emerging Rugby Local Plan makes provision for 14,154 dwellings however a large proportion of these require Green Belt land to be released.

Moreover, the Council confirmed at a Planning Committee in March 2025 that they are unable to demonstrate a five year housing land supply due to the increased requirement from the new standard method. as set out in revised National Planning Policy Framework (NPPF). The Council confirmed their position to be 4.6 years however it would be reasonable to conclude this figure would be lower based on the slow delivery of some of the main allocations at Rugby. This reaffirms the importance of the Council identifying sufficient sites that will deliver the homes that are needed early on within the plan period. Land South of Lilbourne Road is well placed to achieve this given it is in control of a single landowner and within a sustainable location and therefore capable of delivery within the next five years.

Spatial Strategy

The Rugby Local Plan, through policy GP2, establishes a settlement hierarchy with Clifton upon Dunsmore identified as a Main Rural Settlement. Main Rural Settlements have a sufficient level of services, or access to services to allow for development within the existing settlement boundaries and/or allocations.

The emerging Rugby Local Plan focuses the majority of new residential allocations, excluding the large SUE's at Rugby Town, at the Main Rural Settlements. Clifton upon Dunsmore is currently proposed to accommodate an additional 150 dwellings which is less than Long Lawford (400), Stretton on Dunsmore (168), Brinklow (415) and Wolvey (710).

Whilst it is considered a sound approach to direct new development to the Main Rural Settlements, it is only Clifton upon Dunsmore which is not surrounded by Green Belt. The NPPF sets out 145 that '...Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced through the preparation or updating of plans.'

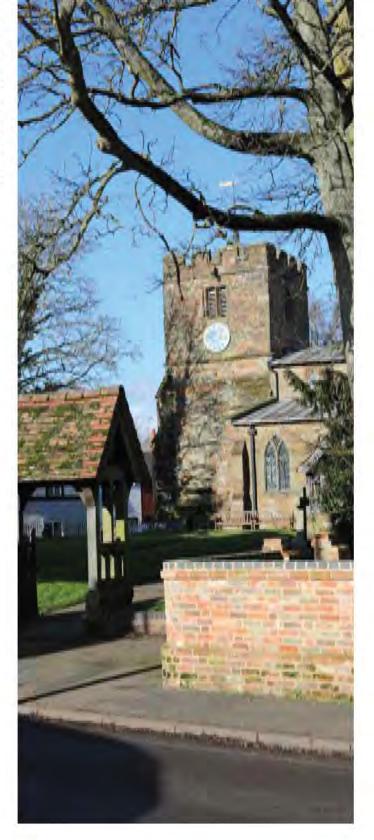
For plan-makers to reach a point where exceptional circumstances can be demonstrated, paragraph 146 confirms that this can include *i...instances where an authority cannot meet its identified need for homes, commercial or other development through other means*:

And at paragraph 147 'Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.'

The NPPF clearly sets out a sequential approach to allocating land for development within the Green Belt – essentially dictating that utilising Green Belt land should be a 'last resort', where there are no other options to accommodate the required growth. Based on analysis of the site and Clifton upon Dunsmore, particular when compared to other main rural settlements, it is considered that there is a strong and robust case that the site is sequentially preferable to sites within the Green Belt.

Site Assessment

The site has been assessed as part of the Councils Stage 2 Site Assessment Report under reference 83. The Council decided not to progress the site further due to heritage and landscape constraints. However, the Councils Heritage Assessment (March 2025) indicates that mitigation against this harm could be provided through high standard of design. As evidenced within this Vision Document in the subsequent sections, Mackenzie Miller have sought demonstrate a responsive and sensitively designed scheme that has the potential to deliver a mix of housing types and tenures as well as adequately mitigate against any of the identified constraints.



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02.02 Contextual Analysis

Site Description

The village of Clifton upon Dunsmore exhibits typically organic settlement form characteristics. Development form follows the confluence of historic and primary movement routes along Lilbourne Road, Church Street and Main Street.

Form

Building frontages to the east of the village are connected to form terraced building lines and strong form of enclosure to the south side of Lilbourne Road. Further, this tradition continues in the form a of a terrace of listed cottages adjacent to the site at the junction of Lilbourne Road and Hillmorton Lane.

Away from the primary movement routes, the village exhibits more recent development of various scales. Large block depths have arisen in many instances of back-land development, forming intricate courtyards and lanes for homes.

Larger developments compliment the organic form with assemblies of multiple buildings of consistent character. This includes large garden suburb urban extension form on Shuttleworth Road and north of Station Road.

Architecture & Materiality

The village contains a diverse collection of architectural styles. Whilst the 14th century St Mary's Church provides a welcome punctuation, largely domestic scale two-storey properties dominate the village. Extending away from the primary routes, widespread examples of 20th century styles are visible. A warm red / orange brick provides the dominant facing material to homes. Rendered façades are also common, whilst examples of timbered buildings can be found throughout the village both through authentic and 'mock' means.

- 20th century terraced housing along Lilbourne road leading towards the site. No frontage space. Mix of brick and rendered finishes.
- (2) Traditional thatched roof house on Lilbourne Road
- Saint Mary's Church at the centre of Clifton Upon Dunsmore.
- Terraced housing along Lilbourne road with large setbacks and large trees in the frontage space.
- Grade II* listed old hall with views of conservation area within the site.
- 6 Lake adjacent to Buckwell lane





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02.03 Landscape

Landscape Character

The Warwickshire County Council have produced a Landscape Guidelines document that has classified the landscape character areas (LCAs) in the local area along with a description of the key characteristics that make up the fabric of the landscape. The line of mature trees cuts across the site from east to site has been identified as lying in the Dunsmore character area: 'an intensively farmed, and in places urbanised, region, with a varied rolling, dissected topography characterised by low glacial plateaux and incised, meandering river valleys'.

The Plateau Fringe Landscape Character Type (LCT). is described as:

"A rather variable, often large scale farmed landscape with a varied undulating topography and characterised by nucleated settlement pattern of small, often shrunken villages."

Characteristic features

- An undulating topography of low rounded hills and narrow meandering river valleys.
- Large, arable fields, often with a poorly defined field pattern.
- Pockets of permanent pasture and smaller hedged fields, usually associated with more steeply sloping ground.
- A nucleated settlement pattern typically comprising loose clusters of dwellings.
- Isolated, brick built farmsteads.

The Landscape Assessment of the Borough of Rugby (April 2006) follows the same characterisation with some refinement to the extent of each Landscape Character Type (LCT). Further work has been done on the LCTs with the results of the sensitivity analyses considered.

The landscape and visual sensitivity has been assessed in the document with reference to particular key elements that define the character of a particular landscape. The analysis of sensitivity look separately at the **fragility** of the inherent (**natural and cultural**) pattern and the degree of visibility within each landscape. The site was considered to be of *Moderate* sensitivity overall combining the fragility of inherent character and visibility (see Map 3 opposite).

Site Characteristics

The site comprises is a single arable field located at occasional glimpsed views in breaks in the roadside the eastern end of the village and bordered on three sides by roads with a farmers track to the east. All boundaries are defined by hedgerows, and a distinct west and a second line to the south. The remainder of the site is arable land and actively cropped each year.

In terms of built form, there are a number of buildings surrounding the site, including Clifton Hall Farm to the northeast boundary, Holly Tree Lodge and Meranti Lodge to the southwest, and Oakridge Farm to the south. Clifton Hall lies to the southeast corner of the site with a driveway that runs along the full length of the southern boundary, and the house surrounded by mature trees. The Gables on Lilbourne Road to the north sits on its own. Therefore the site is influenced by a number of built elements to all boundaries, and lies on a relatively flat area of land, before the topography descends more dramatically further to the southeast from the ridgeline.

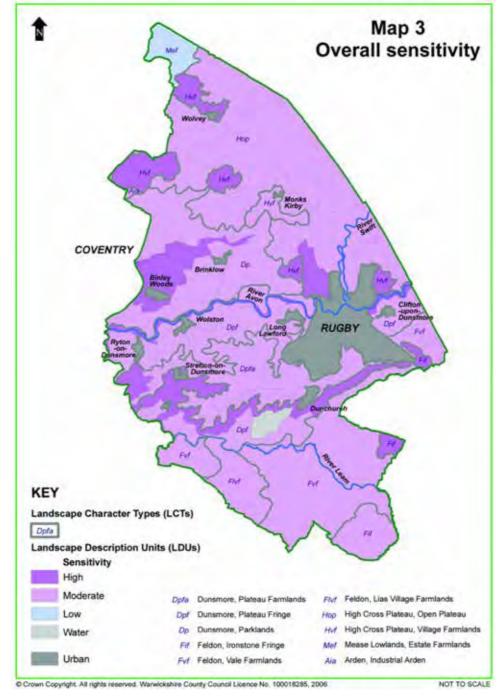
Visibility

A site visit has been carried out to identify the visibility of the site from a number of local roads and footpaths to assess the receptors that may be affected by the changes in views and visual amenity. Slides are provided on the following pages, and illustrate the characteristics of each viewpoint and the elements that make up the local setting.

Views are available along Main Street when travelling east towards the site, with a glimpsed view of the site beyond the cluster of trees at the road junction. Where Lilbourne Road and Hillmorton Lane meet the site is more prominent, along with the line of mature trees that run through the site. Approaching the village from the south, the existing urban edge of Clifton upon Dunsmore is apparent as are a number of individual properties that lie outside of the village. The site is glimpsed in views and largely identifiable by the mature trees running through the site. Views from further to the south are not available due to topography and intervening vegetation.

Approaching from the east along Lilbourne Road, the route is well enclosed and meandering, with only the

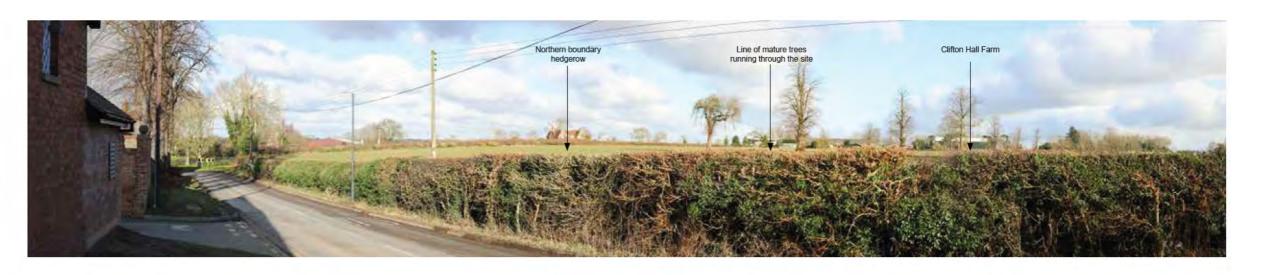
hedge of Clifton Hall Farm with the site beyond.



Extract of Landscape Assessment of the Borough of Rugby (April 2006)

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02.04 Heritage

Heritage Impact Assessment

A Heritage Appraisal was undertaken by Marrons to The Old Hall inform the emerging strategy for the development of the site, ensuring the heritage baseline was understood and responded to appropriately from the outset.

As can be seen on the Built Heritage Assets Plan overleaf, there are no designated heritage assets located within the site however it does identify a number of assets within 1000m. Within the vicinity of the site and considered most relevant, is the Clifton upon Dunsmore Conservation Area which borders the western boundary of the site and two Grade II Listed Buildings which are inter-visible to varying degrees within: The Old Hall and Clifton Manor. Clifton Hall to the south-east of the site was also identified as part of the baseline heritage research to merit assessment as a non-designated heritage asset. These assets have been established to be sensitive to the development of the site through changes within their respective century building of some status, displayed by the polite settings

Local Heritage

Clifton upon Dunsmore Conservation Area

The site forms part of an open and undeveloped rural mid-ground and backdrop to views out from the Conservation Area. It is a defining feature of its rural setting at one end of its linear form. As such, of the site make a moderate positive contribution to the significance of the Conservation Area. Due to intervening built form, vegetation and topographical changes, the central and eastern areas of the site are less visually apparent from the Conservation Area and make a more limited contribution to its significance. from the site only offer a limited appreciation of its character. This is due to the sunken character of the iunction of Lilbourne Road and Hillmorton Lane whereby only a few features of architectural interest are clearly apparent from the site alongside the equally apparent sylvan canopy and modern residential development.

This Listed Building is of architectural and historic interest as a now combined trio of workers' cottages dating in part to the seventeenth century. The position of the building facing, and in part turning to, the junction of Lilbourne Road and Hillmorton Lane means they are understood as a relative landmark and a gateway building to the eastern extent of the Conservation Area. The site is visible in views of The Old Hall from the west and forms a rural backdrop to the cottages, where the rural qualities of the westernmost part of the site form a positive aspect of the buildings' setting.

Clifton Manor

Clifton Manor's heritage significance is vested in its architectural and historic interest as an early eighteenth proportions of its principal elevation facing Lilibourne Road. Clifton Manor does not occupy a strong presence within the streetscene being set back beyond the mature planting which defines its garden plot. It has been established that there is no clear sense of intervisibility between Clifton Manor and the site and no evidence of any historic associations. As such, is it not considered the site makes any meaningful contribution to its heritage significance.

Clifton Hall

Clifton Hallpossesses a local level of heritage significance as a late-nineteenth century villa built in a loosely the agricultural character of the westernmost parts Italianate style. It is situated within a generous garden plot which gives way to an extensive undeveloped setting. The site lies immediately adjacent to its grounds and forms part of its wider rural surroundings, with varying degrees of intervisibility between them apparent. There is a vestigial appreciation of the site as forming an area of informal parkland associated Reciprocally, views towards the Conservation Area with the Hall in the single row of trees crossing the site which form one of half of a historic avenue defining the approach to the Hall. As such, the site is considered to make a low positive contribution to the significance of the Hall.

- Effectively mitigate harm to the Conservation Area, Summary of Impacts The Old Hall (Grade II Listed Building) and Clifton Hall (non-designated heritage asset)
- Sustain a positive backdrop to eastern views out of the Conservation Area which assimilates with the existing character of the streetscene and its rural
- Informed integration with Allocation 129 to mitigate any potential cumulative effects on sensitive heritage assets.

Opportunities & Constraints

The site positively contributes to the significance of both the Conservation Area and The Old Hall. with the westernmost area providing the strongest contribution to these assets. The site also makes a general low positive contribution to Clifton Hall. The emerging design approach positively responds to these sensitivities in a number of ways to mitigate the impact of the development on their respective significance:

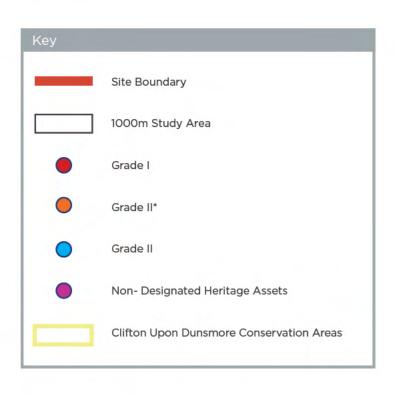
- · The existing green immediately to the west of the site is extended to form an area of open space using a traditional, familiar form to create a communal area of open space which maintains the experience of a rural backdrop to views from these heritage assets and deliver a gateway entrance to the village.
- The extended village green transitions further to the east to adopt a more parkland character, restoring elements of the previous historic landscape which once existed within this view, including the tree avenue which is embedded as an important green corridor through the scheme.
- The northern edge of the built development adopts a gentle building line which would be softened further by planting along the road frontage addressing the transition between the Conservation Area and its wider surroundings.

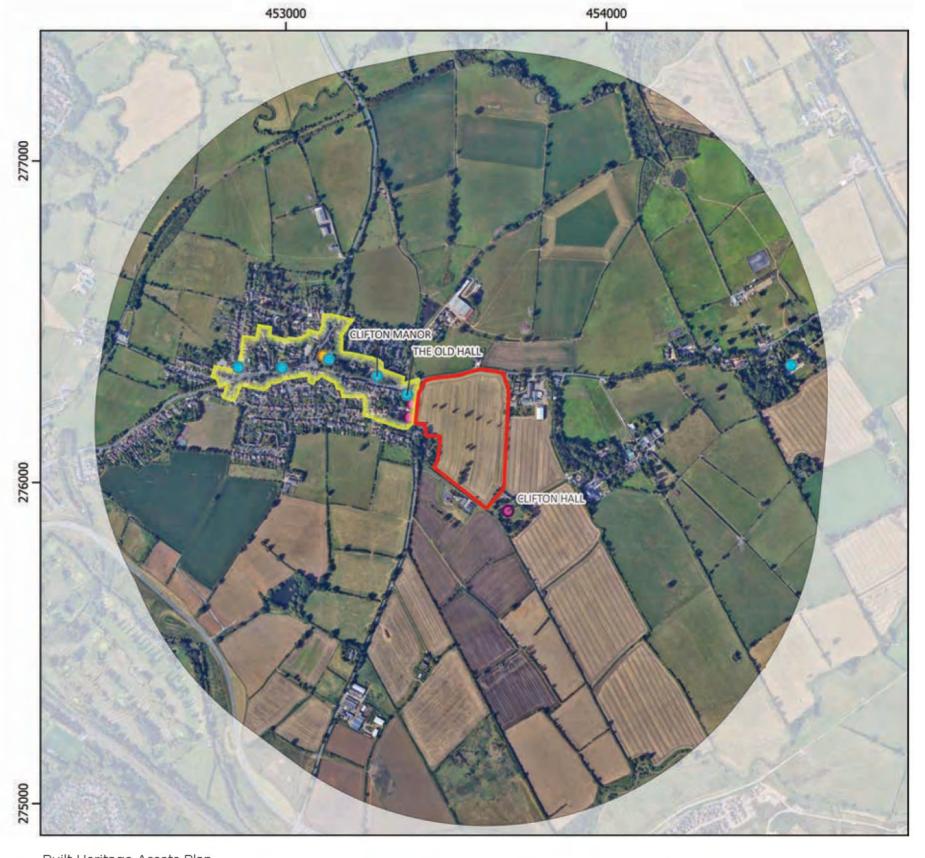
It is considered that the development of the site would cause less than substantial harm to the significance of the Clifton upon Dunsmore Conservation Area and The Old Hall. There will also be a low degree of harm to the significance of Clifton Hall. However, this harm could be mitigated through the design approach as set out above, with the masterplan providing opportunities to respond to the distinctive character of the streetscene as well as the known history of the site, reinstating the legibility of historic connections and providing opportunities to celebrate historic features within and adjacent to the site.

The harm that remains to the designated heritage assets would be balanced against the public benefits of the site, which include a number of specific heritage benefits. Any future application would be supported by a full Heritage Impact Assessment prepared in accordance with the NPPF and Historic England guidance. This would include a detailed consideration of the sensitive above and below-ground heritage assets in addition to the archaeological potential of the site.

On the basis of the above, it has been demonstrated that there are no heritage constraints which would prohibit the allocation and development of the site

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Built Heritage Assets Plan

02.05 Ecology Appraisal

Ecology

An ecological and arboriculture assessment was carried out by Turnstone Ecology in April 2025 to assess the habitats on site and identify any ecological constraints.

The site was dominated by arable land, with native hedgerows along the site boundaries. Mature, individual trees were located across the site. The arable land has little ecological value and all trees and the majority of hedgerows are to be retained.

There were no significant ecological constraints identified within the site boundary, information about each relevant species group is summarised below.

Badger: There was no evidence of Badger across the site but high Rabbit usage along the eastern boundary.

Bats: Some of the trees on site provided suitable roosting features for bats, although these trees are likely to be retained. As the vision document evolves, any trees that will be impacted will be subject to appropriate surveys.

Birds: The native hedgerows and trees provided suitable nesting habitat for birds, although these features are likely to be retained.

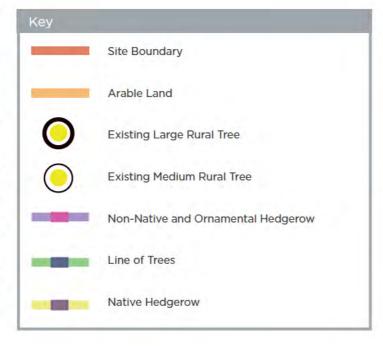
Great Crested Newt: One pond is present 20m east of the site in association with the farmyard, which will undergo an environmental DNA survey for Great Crested Newt.

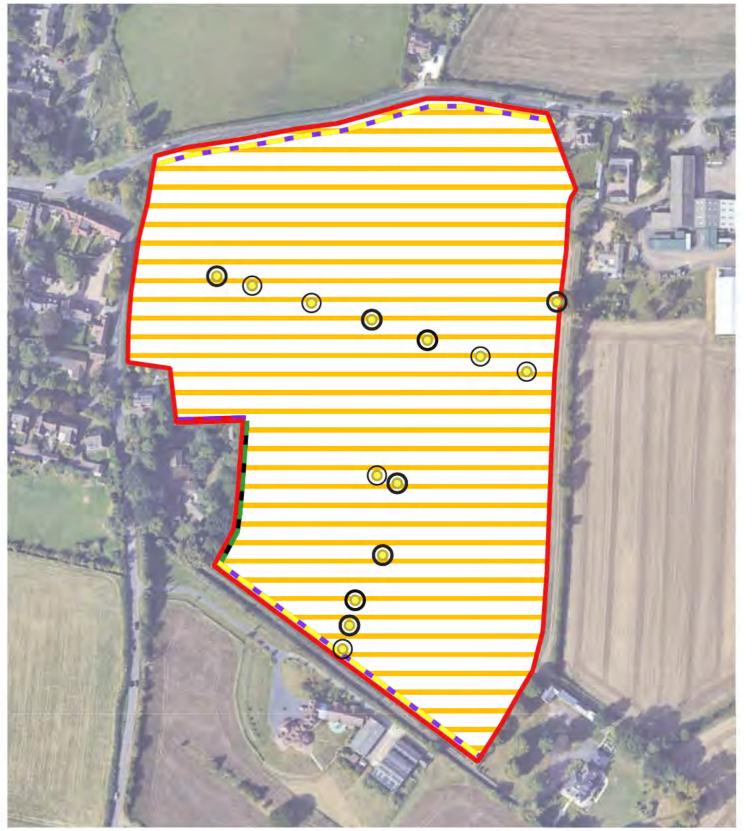
Reptiles: There was no suitable habitat suitable for reptiles.

The assessment has found that there will be an improvement for wildlife through the scheme for the following reasons:

- The retention of mature trees and the majority of the field boundary hedgerows, along with new tree planting and hedgerow enhancement will prevent the loss of habitat for bats and birds, while providing new and beneficial breeding, foraging and commuting habitat.
- Wetland habitat in association with SUDs and ponds will provide new habitat for amphibians and reptiles previously unavailable on site, as well as

- providing new foraging habitat for bats and birds.
 Integrated bat and bird boxes will be included within the final design to provide a range of roosting and nesting opportunities for bats and birds respectively. Additional bat and bird boxes will also be installed on mature trees.
- Loss of farmland mitigated through a comprehensive ecological landscaping and enhancement plan which will retain areas of highest ecological value and will create new and beneficial habitats throughout the site. The plan will also ensure that all retained and created habitats are ecologically connected and this will result in a project that will ultimately deliver a net gain for biodiversity.





Baseline Habitat Plan

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02.06 Flood Risk and Drainage

Drainage

Based on Envrionment Agency data, the whole of the • Review the British Geological Survey data for the site lies within flood zone 1. Land in flood zone 1 has a low probability of flooding. This means in any year land has a less than 0.1% chance of flooding from rivers • and sea.

There are some areas within the site which are subject to a low risk of surface water. All built development should be situauted outside of these areas.

The Flood Risk Assessment will provide an appraisal of flood risk related matters and their impact on the development and neighbouring sites. Information will be sourced from publicly published data and will be used to analyse the environment setting including ground strata, hydrology and topography. This report will then set out parameters and serve as a guide to inform the drainage design.

The SuDS Drainage Strategy will detail how surface water runoff from the proposed development will be controlled and discharged in a sustainable manner to improve or maintain the pre-development discharge parameters. The surface water drainage strategy for • the site will aim to achieve the following:

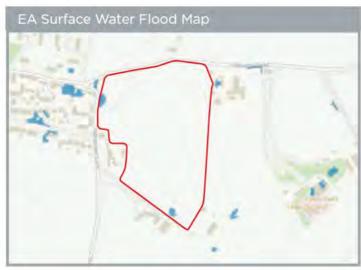
- · Water Quantity Intercept and reduce the amount of surface water discharge by managing post development flood risk through source and catchment control thereby maintaining and protecting the natural water cycle
- Water Quality Implement measures to mitigate against water pollution and improve the overall final discharge to outfalls including groundwater
- · Amenity Create sustainable, useful and 'livable' places to help engineer urban landscapes for people thereby improving on the quality of human life
- · Biodiversity Create new habitats and improve upon existing ones thereby encouraging wildlife to thrive in functional interdependent ecosystems

In light of the above, mode Infrastructure will;

 Obtain and review flood data from the EA to inform the proposals and mitigation measures

- Assess the existing and proposed impermeable areas and allowable discharge rates
- Prepare a FRA report to prescriptions as set out by Worcestershire County Council as the Lead Local Flood Authority
- Develop a SuDS design including calculations for attenuation requirements and flow control
- Design a surface water network resilient to the effects of the appropriate climate change allowance
- Develop a preliminary levels design to support drainage proposals
- Develop a management and maintenance schedule for SuDS features in accordance with the CIRIA SuDS Manual C753
- Develop a flood exceedance plan showing surface water routes during storms above the designed rainfall events and/or for network failure





Drainage Strategy Plan

02.07 Transportation

Transport Assessment

A Transport Assessment will be completed to accompany the planning application. The Transport Assessment will thoroughly and holistically assess the transport, connectivity and highway impact associated with the proposed development.

The site is considered to be ideally located to accommodate a residential development for the following reasons:

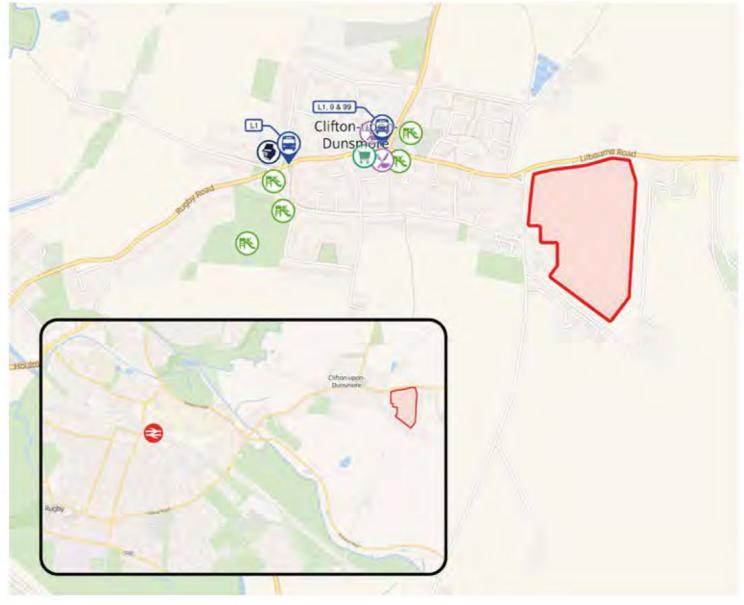
The site is well connected with respect to the village centre;

- There are education, retail, food & beverage, healthcare and leisure amenities within acceptable walking distances of the site and desirable cycling distances; therefore, the location of the development is considered sustainable;
- The site is well connected with respect to the local bus services which route via Main Street in the centre of Clifton upon Dunsmore, providing services between Lilbourne and Rugby. The closest bus stop to the site is located approximately 380m from the site, reachable via a 5-minute walk.
- The closest railway station to the site is Rugby Station which is located c.2.5km west of the proposed development and provides frequent services to key destinations including Birmingham, London, Milton Keynes, Manchester and Crewe.
- A review of PIC data covering the most recent five-year period has revealed that there are no discernible highway safety issues that would be exacerbated by the development.

The local amenities and transport opportunities are depicted within the diagram plan adjacent.

A junction capacity assessment of the vehicular access to the site has demonstrated that it is forecast to operate with significant reserve capacity in a five-year post opening scenario.





Clifton Amenities and Transport Plan

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02.08 Access

Site Access

Proposals for the provision of vehicular access into the site have been developed in accordance with appropriate technical requirements for the safe and practical movement of vehicles and pedestrians. The proposed access strategy for the site features a primary vehicular access, an emergency access and a traffic-free shared-use pedestrian and cycle access.

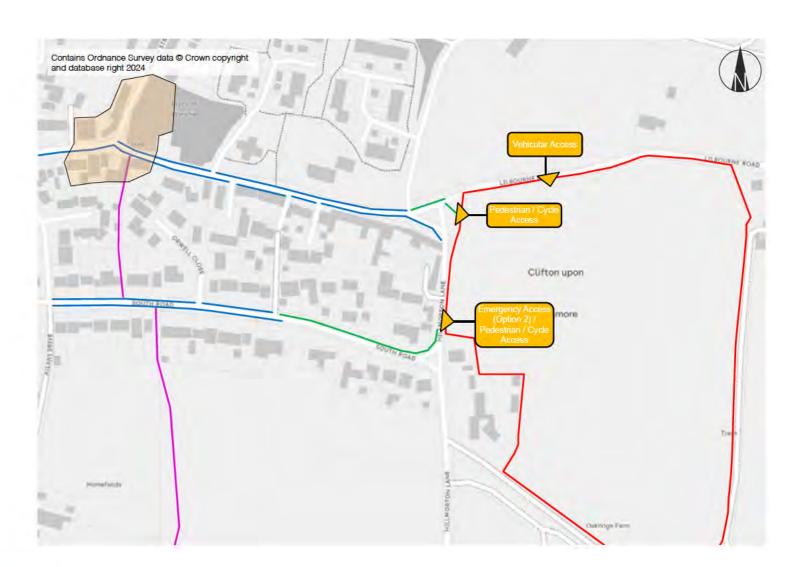
The primary vehicular access is to be located on the northern boundary of the site, to form a connection with Lilbourne Road. The location of the access has been positioned to ensure suitability with the mainline carriageway on Lilbourne Road, that visibility requirements can be achieved and to limit the impact on the surrounding landscape and ecology.

The primary access will take the form of a priority-controlled T-junction, orientated perpendicular to Lilbourne Road and will come forward with an initial straight section, to permit safe and suitable means of access for accessing and egressing vehicles. The geometry, footprint and design of the access has been prepared in accordance with Warwickshire Design Guide, commensurate with the scale of the development.

A secondary point of access will be situated on the western side of the site, forming a connection with Hillmorton Lane. This access is for the express use by emergency vehicles during emergency situations only and will be controlled by means of a modal filter. Access by means of walking, wheeling and cycling will still be possible but vehicular access will be prevented outside of emergency situations.

With a focus on pedestrian permeability, the development will also come forward with a dedicated shared-use pedestrian and cycle access, The vision for this route is that it will align with the existing tree line which runs centrally through the site to create a green corridor and form a central feature to the development. This will emerge in the north-western extent of the site offering a direct connection along the desire line into the village centre for pedestrians and cyclists.

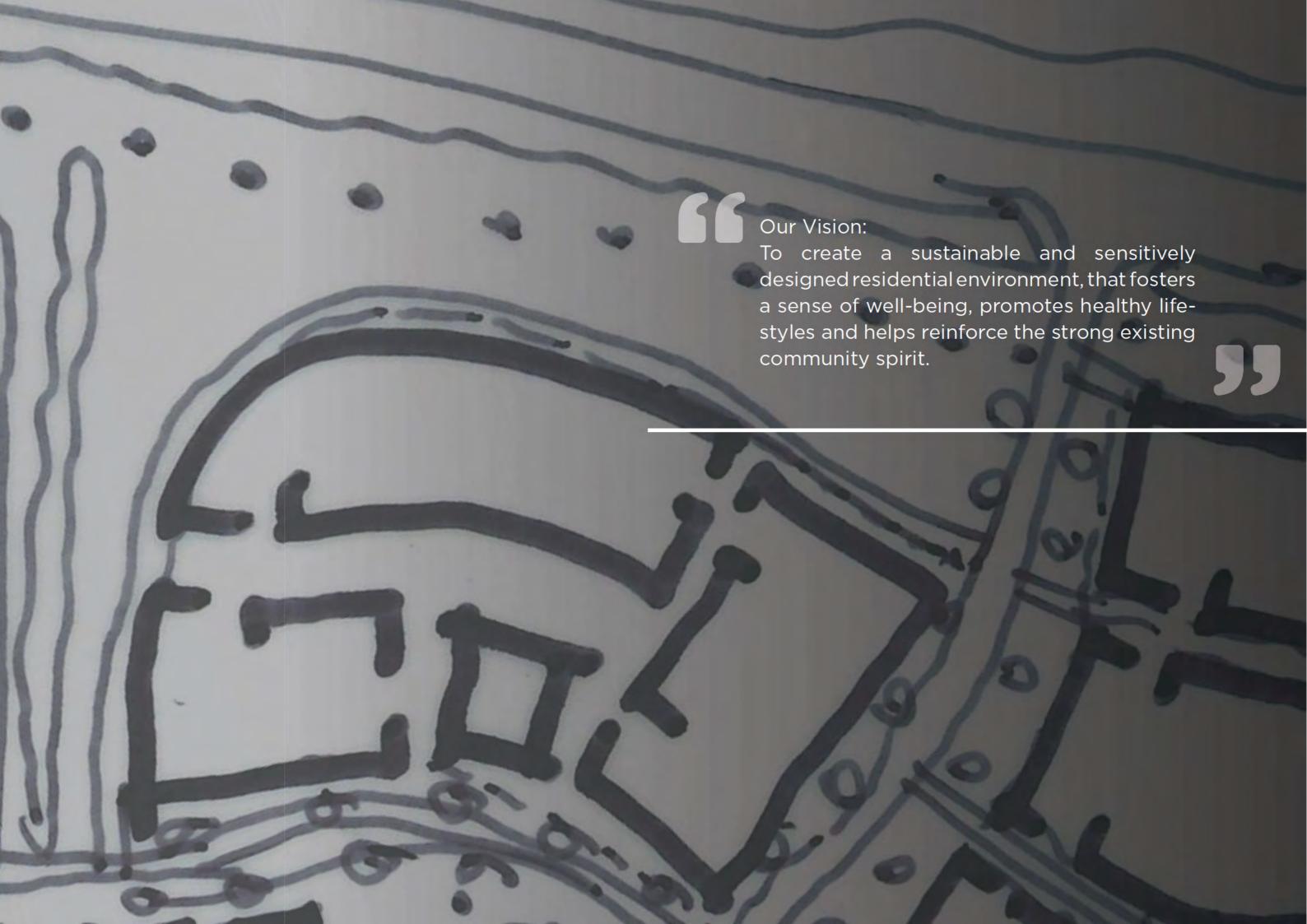
Aspirations for the development seek to deliver new footway provision for Clifton Upon Dunsmore in the area immediately surrounding the site; this is to tie into the existing infrastructure, facilitating pedestrian movement between the development and the village centre, and to the wider pedestrian network beyond.





Access Points Plan





03.01 Design Guidance

Introduction

Our vision is to create a highly sustainable, attractive, welcoming, high quality residential led community, the design of which, builds-upon the unique characteristics of Clifton Upon Dunsmore and its wider landscape setting to establish a highly sensitive development. Further, our approach will allow the development to mature, and act as an enriching framework for the newly extended community to flourish into the future.

Our development will be designed to enhance the established character through sensitive landscaping and built form.

Our proposals will help facilitate sustainable growth of Clifton, with the provision of new public open spaces, and to maximise its sustainability credentials by delivering a highly 'walkable' neighbourhood.

Key guiding principles underpinning the vision for the development include:

- A focus on sustainable transport
- · Pedestrian and cycle access to Clifton centre
- Local Character and Quality
- · Green Spaces for All
- · Walkable Neighbourhood
- Improved access to the countryside
- Healthy Living
- Environmental Sustainability
- Enhanced Biodiversity

The design team have used the following guidance documents to help shape the proposals-

Clifton Neighbourhood Plan Design Guide and Codes



The ten characteristics of well-designed places



CONTEXT

Homes, spaces and functions that reflect the distinctive characteristics of the area.



PUBLIC SPACES

Intentional public spaces, that have a function and not just 'left-over' spaces. Spaces will support healthy lifestyles and encourage walking and cycling.

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IDENTITY

Designs that will be memorable and create a unique and distinctive identity for the neighbourhood.



USES

Building and space uses to deliver upon local needs and enhance the lived experience.



BUILT FORM

Sensitively arranged buildings that reinforce the hierarchy of spaces, appropriately proportioned and create activity to spaces.



HOMES & BUILDINGS

A mix of home types to encourage the creation of a mixed community across all ages and means.



MOVEMENT

A clear and legible movement structure that favours sustainable modes and encourages healthy lifestyle choices



RESOURCES

Using available resources wisely, limiting unnecessary travel and waste through considerate management practices.



NATURE

Retaining natural features and maximising the potential for enhanced ecology.



LIFESPAN

Considering the appropriate lifespan of the buildings, maximising robustness and end of life recyclability.

03.02 Constraints & Opportunities

Overview

As set out in this document we have completed a full palette of technical summaries to ensure that our proposals are robust and represent a fully deliverable offer for much-needed new homes within the wider Rugby area.

The following sets out the key constraints established for the site and the opportunities identified for strong placemaking and the establishment of a highly sustainable living environment.

Constraints

- The site features mature trees that enhance its character, while the surrounding arable land has limited ecological value due to intensive agricultural use. Existing trees and hedgerows will be retained to maintain ecological integrity and support wildlife habitats, and raise conservation efforts. These retained assets will assist in the visual containment of the project.
- There were no significant ecological constraints identified within the site boundary. Birds and bats have established habitats in the existing trees, and there are visible rabbit trails along the eastern boundary. As such ecology poses little constraint on the development.
- The area surrounding the site includes the Clifton upon Dunsmore Conservation Area, which is located along the western boundary. Additionally, there are two Grade II Listed Buildings and one non-designated heritage asset in close proximity.
- The primary vehicular access is to be located on the northern boundary of the site, to form a connection with Lilbourne Road. The location of the access has been positioned to ensure suitability with the mainline carriageway on Lilbourne Road and provide a clear connection to the village.
- The site slopes to the north western corner. Potential flooding can be mitigated by SUDs in this location in the formation of large basins.

Opportunities

- Low point at the north-west will be ideal for use of blue infrastructure to form part of a 'village pond' style landscape.
- Existing trees create instant maturity in the character of the place, so will be used as focal points within the landscape.
- The restoration of the historic avenue of trees will form the character driver for the entire neighbourhood. Existing tree planting will be complimented by a wider green infrastructure strategy that sets homes in an attractive treeplanted landscape.
- The site has excellent accessibility for pedestrians, and cyclists creating an excellent opportunity for a highly walkable and sustainable neighbourhood.
- Vehicular access into the site is simply delivered and requires minimal physical disruption outside of the site boundary;
- Contains substantial open land with good ground conditions for development;
- The limited existing ecological characteristics create the opportunity for significant enhancements over the baseline position
- Has ideal topographical characteristics to enable strong SuDs features to be incorporated.



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03.03 Illustrative Masterplan

Introduction

This section of the document discusses the principles and organisation of the illustrative masterplan. Our proposals use a landscape and heritage approach to ensure the new development will deliver a highly attractive and environmentally sensitive place to live, site. It is envisaged that the site could accommodate whilst also honoring the established settlement and its historic significances.

Our approach seeks to form a large attractive landscape area in the north-west corner of the site. This space is intended to act as a crucial community assest where new and existing residents can come together around a village pond. This space also creates sets back built development significantly from the existing heritage assets of Clifton Manor and The Old Hall on Lilbourne Road.

Our masterplan is seated in our rigorous understanding of best practice urban design. Our proposals learn from the pattern and character of this unique village setting and propose well-structured urban blocks, and a strong hierarchy of walkable streets that will combine to ensure the development will seemlessly integrate with the existing village and its established community.

Masterplan Strategy

Our masterplan proposals are underpinned by a thorough range of technical studies. These have informed the development of proposals that have established an appropriate developable areas for the appropriately 180 new homes.

The masterplan takes a landscape led approach which reflects the historic development patterns. It proposes to restore and retain the tree-lined avenue reinstating the relationship between Clifton Hall Farm and The Old Hall. Trees to the fringes of the site are retained, enabling screening and softening of the built form as viewed externally.

The masterplan emphasises numerous trees and tree groupings and uses these as focal points for key areas of public open space within the site. New trees will be planted to enhance the landscape structure of the site.

The masterplan is shaped around the dominant structuring feature, The Green Way. This feature uses a line of existing trees that formerly lined an historic accessway to form a green link through the site to connect into the existing village at the junction of Lilbourne Road and Hillmorton Lane. This 'Big Move' in the masterplan encourages walking and cycling into the village through the creation of this direct and characterful route.

The masterplan avoids prominent elements of development in the northern elements of the site by maximising open space and green corridors. This preserves the rural views from the conservation area.

The masterplan also proposes to form a substantial green space in the north west corner of the site which will deliver an attractive gateway entrance to the village. This is envisaged to provide a community asset for new and existing residents such as a village pond or green. The role of this space will provide an excellent canvas for community involvement in the project.

To the south of the site, the masterplan locates homes around existing mature trees to form a new 'Green'. This space is intended to act as the safe surveilled environment providing opportunities for informal play and recreation with the intention on becoming a subcommunity focal point of the wider community. The new Green will create a functional community asset for the whole village with wider links through to a new 'parkland' reminiscent of the historical use of the land

prior to its current agricultural use.

Within the site the landscape proposals will create a hierarchy of landscape treatments through a varied palette of trees, hedgerows, native thicket, ornamental shrubs and meadow grass seeding. This strategy will ensure a minimum 10% Biodiversity Net Gain is achieved on site.

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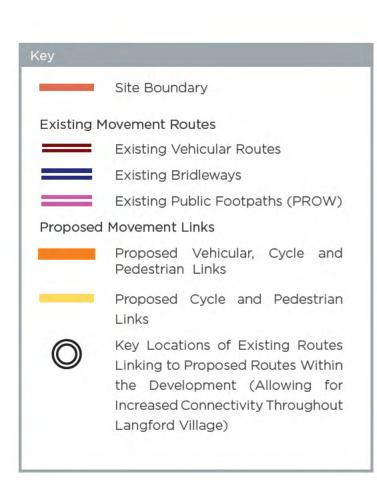
03.04 Movement

Movement Considerations

The masterplan is organised to maximise connectivity within the site and form clear and safe connections to Lilbourne road and Hillmorton Lane.

The streets have regard to LTN 1/20 - Cycle Infrastructure Design Local Transport Note which sets a clear ambition to make cycling and walking the natural choices for short journeys or as part of a longer journey, promoting pedestrian primacy with supporting objectives to increase the level of walking, cycling and others forms of sustainable travel.

The proposals use the existing Avenue of trees through the site as the setting for a new linear 'Greenway' with connection directly into Cilfton via a pedestrian / cycle connection in the north-west corner of the site.



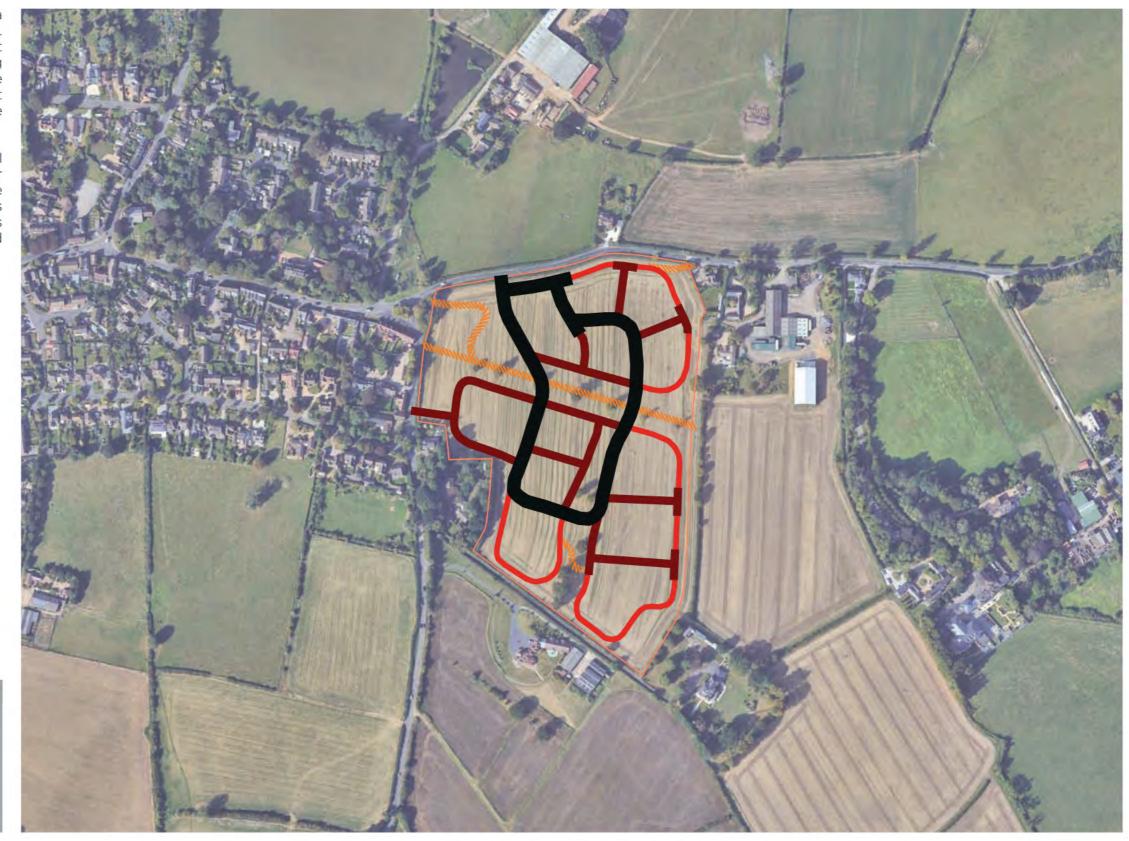


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Hierarchy of Streets

The Illustrative masterplan demonstrates how a hierarchy of streets can be delivered for the site. The approach defines a clear and legible movement framework which further contributes to place-making and the character experience of the development. The street hierarchy can be considered as one of the most crucial base principles that structures the design of the entire development.

The character, landscape strategy and architectural design all build upon this framework and play their individual contributions to the creation of an attractive and legible neighbourhood. The design of 'roads' is just one component of a wider set of design principles that combine positively to deliver attractive safe and inclusive streets and spaces.





03.05 Illustrative Sketches

Atmospheric Vision

The following artist's impressions have been designed to provide an indication of the potential character of the site.



Sketch Perspective 1

This artist's impression illustrates for one of the attractive green edges of the development, where homes benefit from views over extensive green-spaces.

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Sketch Perspective 2

This artist's impression illustrates how a traditional informal tertiary street within the development could feel. Soft landscaping and street trees help contribute towards an informal feel to the street which is faced with modest yet characterful homes.





04.01 Summary and Benefits

The illustrative masterplan has been developed in a manner founded in best practice urban design principles, community integration and sustainable development, with strong links to the wider area and sensitivity to its setting within Clifton Upon Dunsmore.

The proposed development will be a highly desirable place to live for the 21st century and beyond, reflecting the desirable elements of the local Clifton Upon Dunsmore vernacular. The proposals respect the local character but also move the community towards a more sustainable future. Development will accord with the principles of high-quality design and best practice to create a townscape that is both varied, and yet sympathetic to its environment. The aim is to achieve a development with a strong identity and distinct sense of place, whilst at the same time integrating with the existing built fabric of Clifton Upon Dunsmore.

The site is not the subject of any known technical, viability or environmental constraints that would prevent it coming forward for housing development. It is being promoted by an SME housebuilder with

a track record of delivering high quality residential development. Working proactively with the Council, Mackenzie Miller Homes would seek to bring the site forward for development, through the Local Plan, at the earliest opportunity.

The vision set out within this document has the potential to deliver an unrivalled living environment delivering a wide range of benefits to the community: -

- A genuine landscape led approach which reflects the historic development patterns. It proposes to restore and retain the tree-lined avenue reinstating the relationship between Clifton Hall Farm and The Old Hall.
- Through sensitive design and the creation of traditional, familiar form of open space to create a communal area which maintains the experience of a rural backdrop to views from these heritage assets and delivers an attractive gateway entrance to the village.
- Pedestrian and cycle links will be created to improve connections into the historic settlement of Clifton upon Dunsmore, and into the wider historic landscape.
- The site can deliver approximately 180 homes, making a significant contribution to the market and affordable housing needs of Rugby Borough.
- The creation of a functional community asset for the whole village with wider links through to a new 'parkland' reminiscent of the historical use of the land prior to its current agricultural use. The role of this space will provide an excellent canvas for community involvement.
- The provision of an extensive green infrastructure network will ensure that green spaces will be accessible to existing and future residents, and provide a natural resource which the local area can benefit from. This Green Infrastructure network will also ensure a minimum 10% BNG is achieved on site.

Next Steps Mackenzie Miller Homes is hopeful that it can continue to develop a masterplan for the site which takes on board comments from the key stakeholders including the Council, Parish Council and community.



