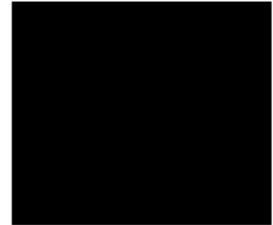


4 November 2025



Clifton upon Dunsmore Neighbourhood Plan  
Development Strategy  
Town Hall  
Evreux Way  
Rugby  
CV21 2RR



Issued via email only: [REDACTED]

Dear Sir / Madam,

**CLIFTON-UPON-DUNSMORE NEIGHBOURHOOD PLAN – REGULATION 16 CONSULTATION  
ARCHDIOCESE OF BIRMINGHAM – LAND OFF STATION ROAD, CLIFTON-UPON-DUNSMORE**

On behalf of the Archdiocese of Birmingham ('AOB'), we are writing to respond to the Clifton-upon-Dunsmore Neighbourhood Plan ('NP') Regulation 16 consultation.

AOB has an interest in two parcels of agricultural land comprising circa 8.9 hectares (22.1 acres) to the north and south of Station Road, Clifton-upon-Dunsmore (the 'Site'). A Site Location Plan has been submitted as Appendix A to these representations.

The Site is considered to be suitable and available for residential development and is free from any significant constraints which would preclude development. The Site is located adjacent to the existing western settlement boundary of Clifton-upon-Dunsmore and is considered to represent a logical and sustainable extension to the existing settlement, which is categorised as a 'Main Rural Settlement' in the adopted Rugby Local Plan. Main Rural Settlements comprise the second of five tiers of the settlement hierarchy behind Rugby. As such, AOB is promoting the Site for allocation in the emerging Rugby Local Plan.

We have set out below our response to the Regulation 16 NP, which we request is taken into account as part of the Examination of the plan.

**Consultation Response**

Housing Need

It is noted that Rugby Borough Council has provided the Parish Council with an indicative housing requirement figure of 150 dwellings, as set out in paragraph 4.26 of the NP. The NP goes on to state that this requirement is met in full by the sites proposed to be allocated in the emerging Local Plan. It is also noted that the Rugby Borough Local Plan Preferred Option Consultation Document (March 2025) identifies three proposed allocations which would provide a total of 150 dwellings.

The emerging Local Plan is at an early stage of preparation and it is not guaranteed that these proposed allocations will be carried through into the adopted version of the Local Plan. We therefore consider that the NP has been progressed prematurely ahead of the adoption of the emerging Local Plan. Planning Practice Guidance<sup>1</sup> is clear that, whilst Neighbourhood Plans can come forward in advance of emerging Local Plans being adopted, a draft NP must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition e). NPPF paragraph 13 also states that neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies.

---

<sup>1</sup> Reference ID: 41-009-20190509



For the reasons set out above, we consider that it is premature for the NP to be examined and made ahead of the emerging Local Plan being adopted and that the NP Examination should be delayed until the emerging LP is found sound. Therefore, as written we do not consider that the NP accords with basic condition e).

We also wish to highlight that there is an inconsistency within the NP as to the plan period the document is intended to cover. Paragraph 8.1 of the NP states that the plan period covers the period to 2031, however paragraphs 3.3 – 3.5 provide a 'Vision to 2041' and the cover of the NP suggests a plan period running from 2011 – 2041. It is considered that further clarity on this should be provided prior to the NP being examined.

#### Policy ENV7: Important Views

We object to Policy ENV7 on the basis that the identified important views are not supported by sufficient evidence to warrant their inclusion in the NP. It is not made clear in the NP what evidence has informed the proposed location of views, nor has the criteria for their designation been made clear.

AOB has instructed Node to produce a review of Neighbourhood Plan viewpoints 5, 6 and 7 and their relationship with the Site. This review is provided as Appendix B to these representations.

The review undertaken by Node identifies some discrepancies between the location of some of the viewpoints on the plan and what is illustrated in the photographs contained within the NP. These are detailed in full within Appendix B and we recommend that further review is undertaken to ensure all identified viewpoints correspond correctly to the photographs and descriptions provided.

Node's review also draws the following conclusions on proposed Viewpoints 5, 6 and 7 within the NP:

#### *Viewpoint 5: Rugby Road on the west side of the village, south over the River Avon valley*

Viewpoint 5 does not appear to be either on a public right of way or on a public footpath but from a narrow verge adjacent to a busy road. The majority of people either driving or walking on the pavement adjacent to the Rugby Road will not appreciate the view as shown in the photograph shown within the NP. Node has provided a series of viewpoint photographs to provide a panoramic and realistic viewpoint from this location.

We consider that viewpoint 5 should be deleted from the NP on the basis that important views should be taken from locations of high sensitivity receptor groups i.e. people walking on public rights of way for the purpose of recreational enjoyment.

#### *Viewpoint 6: From Station Road, Clifton, toward the River Avon open space*

As set out in Node's review, there are discrepancies between the location of the viewpoint arrow and description in the NP and the photograph provided, resulting in a lack of clarity regarding the location of the important view. It appears that the intention is to identify a key view from the Shakespeare's Avon Way Public Right of Way. Node has provided some panoramic viewpoint photographs which demonstrate that the view from viewpoint 6 is impacted by some modern gates which detract from the rural view. Node considers that a more appropriate location for Viewpoint 6 would be further along the Shakespeare's Avon Way Public Right of Way ('Node Viewpoint 5'), as this is a much higher quality view across the River Avon Valley.

#### *Viewpoint 7: From River Avon open space, distant view of Clifton upon Dunsmore village*

There are also discrepancies between the photo location point of Viewpoint 7, the photograph provided, and description included in the NP. The photo location appears to be on an informal footpath within proposed open space 049. As many different views exist from the identified important public space, we consider that clarity is required to the exact location with matching panoramic photography. Justification is then required to the importance of the view based on sensitivity and quality.

Planning Practice Guidance<sup>2</sup> ('PPG') is clear that proportionate, robust evidence should be provided to support the choices made and the approach taken to preparing the NP. As set out in Node's review, we consider that such evidence has not been provided to justify the inclusion of important views as part of the NP. We therefore request that suitable evidence be provided, along with clarification of the discrepancies outlined above, prior to the NP being made.

Policy ENV9: Flood Risk Resilience and Climate Change

We object to Policy ENV9 on the basis that it does not conform with national planning policy and therefore does not meet the requirements of basic condition a).

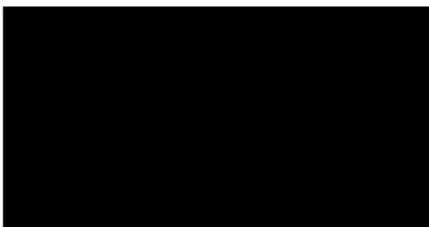
Policy ENV9 states that development proposals on land which is susceptible to flooding from rivers or surface water, as denoted by Figure 13, should demonstrate that no alternative site is available. Whilst we note that this is partially in alignment with the requirement of NPPF paragraphs 174 and 175 for a sequential approach to be taken to ensure that development is steered away from areas at risk of flooding, updates to PPG on this matter were recently published on 17 September 2025. The updated PPG<sup>3</sup> states that:

*"in applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied" (Savills emphasis).*

Therefore, the above clarifications in the PPG confirm that there should be no requirement for applicants to demonstrate that there are no available alternative sites, as long as it can be demonstrated that the development will be safe for its lifetime without increasing flood risk elsewhere. In light of this, we consider that bullet point 1 of part c) of Policy ENV9 should be deleted, to ensure compliance with NPPF paragraph 175 and PPG.

We trust the above is helpful and request to be kept informed with progress on the Neighbourhood Plan.

Yours faithfully



---

<sup>2</sup> Reference ID: 41-040-20160211

<sup>3</sup> Reference ID: 7-027-20220825

Archdiocese of Birmingham - Land off Station Road, Clifton-upon-Dunsmore



© Crown Copyright 2017  
Printed Scale: 1:4000 Paper Size: A3





CLIENT: Archdiocese of Birmingham

LOCATION: Viewpoints – Clifton upon Dunsmore

PURPOSE: Review of Neighbourhood Plan Viewpoints 5, 6, 7 – Clifton upon Dunsmore

DATE: 3<sup>rd</sup> November 2025

## Introduction

The Archdiocese of Birmingham commissioned Node in October 2025 via Savills to undertake a review of Clifton upon Dunsmore Neighbourhood Plan in order to make landscape representations to the plan, specifically in relation to identified important views.

Node is an urban design, landscape, and heritage practice, which is registered with the Landscape Institute (LI) and the Institute for Historic Building Conservation (IHBC), together with holding ISO9001 (quality management) and ISO14001 (environmental management) accreditation. Our experience includes acting as external advisers for several local authorities and undertaking national research projects. We also work on behalf of landowners, developers and house builders, creating masterplans and undertaking landscape and visual impact assessments across the country. As such, we are well versed in the requirements relating to the assessment of landscape, and visual impacts.

This review has been undertaken by Nigel Wakefield, managing director of Node. Nigel Wakefield is a landscape architect, planner, and urban designer with over 34 years of experience. Nigel is a national Built Environment Expert for Design Council and has regularly represented local authorities and applicants as expert witness in matters relating to design, landscape planning, open space and Green Belt issues.

## Landscape Review

A desktop landscape review has been undertaken and has considered the following documents and landscape designation.

- i) Adopted Rugby Local Plan 2011-2031 – Landscape Policies
- ii) Clifton upon Dunsmore Neighbourhood Plan Regulation 16 Draft
- iii) NCA Landscape Character Area 96 Dunsmore and Feldon
- iv) Regional and local character assessments – Warwickshire Landscape Design Guidelines 1993
- v) Landscape designations and public rights of way within the vicinity of Clifton Under Dunsmore



## Local Plan Policies

Consideration has been given to both landscape policies and viewpoints identified within the following documents

- i) Adopted Rugby Local Plan 2011-2031 – Landscape Policies
- ii) Clifton upon Dunsmore Neighbourhood Plan Regulation 16 Draft

## Adopted Rugby Local Plan 2011-2031 – Landscape Policies

Key landscape policies include

- NE1: Protecting Designated Biodiversity and Geodiversity Assets
- NE2: Strategic Green and Blue Infrastructure
- NE3: Landscape Protection and Enhancement
- SDC2: Landscaping

## Clifton upon Dunsmore Neighbourhood Plan 2011-2041

This Neighbourhood Plan which was published in July 2025 covers the whole of the Parish of Clifton upon Dunsmore. It sets out a long-term approach for the development of the Parish and sets out clear development-related policies to realise this. Key policies related to open spaces and views include:

- **POLICY ENV 1: LOCAL GREEN SPACES**

*Development proposals that would result in the loss of, or have an adverse effect on, the following Local Green Spaces (details Appendix 4; locations figure 5.1 and 5.2) will not be permitted other than in very special circumstances.*

- **POLICY ENV 2: IMPORTANT OPEN SPACES**

*Open Space, Sport & Recreation: the following open spaces (shaded yellow in figures 6.1 and 6.2) are of high value for recreation, sport and/or amenity. Development proposals that result in their loss, or have a significant adverse effect on them, will not be supported unless the open space is replaced by at least equivalent provision in an equally suitable location, or unless it can be demonstrated that the open space is no longer required by the community.*

- **POLICY ENV 7: IMPORTANT VIEWS**

*The following views (map figure 11, details Appendix 5) are important to the setting and character of the village. Development proposals should respect and whenever possible protect them. Development which would have an adverse impact on the identified views will not be supported.*



Key figures from the Neighbourhood plan for convenience are attached in an Appendix to this document as follows:

**Figure 1: Important open spaces**

**Figure 2: Sites and features of Natural Environment Significance**

**Figure 3: Wildlife Corridors**

**Figure 4: Important Views**

In addition to understand the landscape character, landscape designations and historic evolution of the area to the west of Clifton upon Dunsmore, the following figures are also attached as an appendix

**Figure 5: National Landscape Character Area 96 – Dunsmore and Feldon**

**Figure 6: Regional Landscape Character Area – Dunsmore (Warwickshire County Council)**

**Figure 7: Environmental and heritage designations**

**Figure 8: Ordnance Survey 1905**

This is followed by further figures which compare Neighbourhood Plan viewpoint locations and photographs with additional viewpoints and panoramic photos undertaken as part of a site visit conducted on 30<sup>th</sup> October 2025 to assess the location and importance of viewpoints as indicated within the Neighbourhood Plan.

### **Important Views**

The Neighbourhood Plan in relation to important views states:

*'Consultation during the Neighbourhood Plan's preparation identified a widely held wish to protect the largely rural settings of Clifton upon Dunsmore and Houlton, in particular their visual relationship with the surrounding countryside, including the distinctive landscapes of National Character Areas 95 Northamptonshire Uplands and 96 Dunsmore and Feldon. One of the main ways in which residents expressed this wish was by describing several highly valued views within and around Clifton and Houlton, and toward the surrounding countryside. These consultation findings were supported by the fieldwork for this chapter of the Plan, which although principally aimed at identifying sites of environmental significance also confirmed the sightlines of the suggested views and mapped them (figure 11).'*

It goes onto identify 11 important views as set out in the policy below. This representation considers and comments only on viewpoints 5, 6 and 7 and their relationship with land owned by the Archdiocese of Birmingham.



## **POLICY ENV 7: IMPORTANT VIEWS –.**

1. Gateway view (south) of Clifton upon Dunsmore village from Newton Road
2. Village view west in the centre of Clifton upon Dunsmore
3. Gateway view (west) into Clifton upon Dunsmore village from Lilbourne Road, with Old Hall Cottage and The Green
4. Distant view south from Newton Road of Clifton upon Dunsmore village and surrounding fields
- 5. From Rugby Road on the west side of the village. south over the River Avon valley**
- 6. From Station Road, Clifton, toward the River Avon open space**
- 7. From River Avon open space, distant view of Clifton upon Dunsmore village**
8. From Hillmorton Locks northeast to Allan's Farm and (on skyline) Clifton upon Dunsmore village
9. From Clifton Recreation Ground, views south and southwest to Bluebell wood, Clifton Brook valley, the Oxford Canal (and Rugby)
- 10 From the entrance to Cow Field, off North Road, Clifton, west across open countryside to the parish boundary
11. From Normandy Hill, Houlton, extensive views north and east over Houlton and the historic site of Rugby Radio Station, including the protected buildings

### **Landscape character**

In order to comment on any views, the starting point is to understand the baseline character of the landscape and its quality and value. The landscape character for Clifton Upon Dunsmore is set out in the following landscape character assessments at national and regional level:

### **NCA Landscape Character Area 96 Dunsmore and Feldon**

Below I set out the key characteristics as set out NCA 96 and Regional Landscape Character Area – Dunsmore with my underlining of characteristics which relate to the area to the west of Clifton upon Dunsmore. A plan is attached Appendix – figure 5.

### **Key Characteristics**

The sense of a predominantly quiet, rural landscape is heightened by its close proximity to several urban areas, with a gently undulating landscape of low hills, heathland plateaux and clay vales separated by the occasional upstanding escarpment.

- The underlying lower Lias clays and Mercia mudstones are similar throughout Dunsmore and Feldon but the Quaternary 'superficial' deposits are what mark the change in character between Dunsmore and Feldon.



- Light sandy soils associated with the west (Dunsmore) supporting mixed farming and some intensive arable with fertile alkaline soils to the east (Feldon) supporting grazed pasture.
- Generally low woodland cover across the area, although there are areas of well-wooded character and ancient woodlands, especially in the north, providing habitats for bluebells, molluscs and fritillary butterflies; these woodlands are linked with landscaped parklands and hedgerow trees.
- Remnants of the formerly extensive Dunsmore Heath, preserving characteristic heathland archaeology, can still be found in woodland clearings. Natural regeneration on sand and gravel soils also occurs along roadside verges, although bracken is often abundant.
- Narrow, meandering river valleys with pollarded willows, streamside alders and patches of scrub supporting dipper, kingfisher, otter and Atlantic stream crayfish.
- Canals, including the Grand Union Canal, and Draycote Reservoir provide important riparian habitats and a well-used recreational resource.
- Mainly large fields, with regular or rectilinear shapes, although some smaller fields also feature. Numerous areas of remnant ridge-and-furrow and earthwork remains of medieval settlements as found at Lower Tysoe, Radwell and Napton on the Hill.
- Predominantly nucleated settlement pattern with a low density of isolated farmsteads and some field barns sitting within a landscape of piecemeal and planned enclosure of the open fields which extended from the villages over large parts of this area. Many villages have recently expanded but the traditional buildings, constructed of red brick or Lias limestone, still retain their blue brick or ironstone details.
- The busy roads and large industrial units on the outskirts of the main settlements of Leamington Spa, Coventry and Rugby exert an urban influence on the surrounding area.
- Limestone quarrying for the cement industry was formerly a feature in the centre and south of the area, and disused quarries are now prominent elements in the landscape. The rock exposures and spoil heaps are of geological importance, as well as having interesting limestone grassland communities.

## Warwickshire Landscape Design Guidelines 1993

### Dunsmore Plateau Fringe - Character and qualities

A rather variable, often large-scale framed landscape with a varied topography and characterised by a nucleated pattern of small, often shrunken villages. A plan is attached in Appendix – Figure 6.



### Key Characteristics

- 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

### Landscape character to west of Clifton upon Dunsmore

The landscape character to the west of Clifton Upon Dunsmore is characterised by the River Avon and its flood plain, with vegetation and trees along watercourses and to boundaries of agricultural fields. The topography of the land rises from the River Avon at approximately 86m A.O.D to 110m A.O.D on Rugby Road with existing development visible on the skyline. Numerous agricultural and residential buildings are located on this slope which are visible from the Shakespeare Avon Way and informal footpaths.

### Landscape designations and public rights of way

In order to understand environmental and heritage designations, consideration has been given to the DEFRA's online resource, Magic: <https://magic.defra.gov.uk> (See Figure 7).

This identifies the following nearby designations: a series of listed buildings within Clifton upon Dunsmore, and Ashlawn Cutting Local Nature Reserve. It does not identify any statutory designations in the vicinity of viewpoints 5, 6 and 7.

Shakespeare's Avon Way, a public right of way runs east – west, crossing the River Avon into Clifton Upon Dunsmore. Viewpoint 6 is located on this public right of way.

Some informal footpaths are located in the designated important open spaces identified within the neighbourhood plan 047, 048 and 049 (See Appendix - figure 1) within which viewpoint 7 appears to be located.

Viewpoint 5 appears to be located on the Rugby Road which has a footway to the south of the road to serve residential properties.



## Site Visit

A site visit was undertaken on 30<sup>th</sup> October 2025 to undertake a review of landscape character, and key viewpoints identified in Clifton upon Dunsmore Neighbourhood Plan, focused on viewpoints 5, 6, and 7 which are in the vicinity of land that is owned by the Archdiocese of Birmingham.

## Assessment approach and methodology for Viewpoints

Policy EN7 Important Views sets out the purpose that they are important to the setting and character of the village. Development proposals should respect and whenever possible protect them. Development which would have an adverse impact on the identified views will not be supported.

It is not clear on what evidence base important views have been designated and what criteria have been considered to designate these protected views within the Neighbourhood Plan. Reference is made to fieldwork, but it is not clear from the document what process has been followed to reach this conclusion.

Furthermore, it is not clear what constitutes an important view, nor what criteria have been used as to the receptor group that could be affected and the sensitivity of that view. Greater clarity is required on what establishes specific viewpoints as important.

## Location and photographs of viewpoints

It appears that some discrepancies exist between the location of some of the viewpoints on the plan and what is illustrated in the photographs.

### *Viewpoint 5 – Rugby Road on the west side of the village. south over the River Avon valley*

This viewpoint does not appear to be either on a public right of way or on a public footpath but from a narrow verge adjacent to a busy road. The majority of people either driving or walking on the pavement adjacent to the Rugby Road will not appreciate the view as shown in the photograph shown within the Neighbourhood Plan.

The photograph taken above a hedge is deceptive in that it gives the impression of just a rural view across the River Avon. To reflect best practice, a wide panoramic photograph using a 50mm lens is required to give a more realistic



impression of the actual view from a location where the majority of people experiencing the view will be walking or driving.

The viewpoint arrow is not located looking south as the description states but north west. The description needs to correspond with the direction of view.

Consideration has been given to this through a site visit with three panoramic photos taken to consider this viewpoint within the Neighbourhood Plan (see Appendix - Figure 10 – illustrative viewpoint locations and panoramas). In order to get a view across the valley from this location, the view should be west not south as stated in the description.

**Node Viewpoint 1** – This shows how narrow the verge is on Rugby Road where people are unlikely to be walking. It shows the view consists of an urban fringe location with residential properties, Rugby Road and a mature hedge in the foreground. Medium and long-distance views consist of the River Avon Valley but in the context of the edge of Rugby, within industrial buildings including Rugby Cement Works on the horizon that detract from the view.

**Node Viewpoint 2, 3** – These viewpoints show the view from the pavement within the vicinity of viewpoint 5. These viewpoints show rather than a rural view across the River Avon that the view is dominated by Rugby Road, a mature hedge and views of Rugby Cement Works.

On the basis that important views should be taken from locations of high sensitivity receptor groups i.e. people walking on public rights of way for the purpose of recreational enjoyment and be of high quality, then I would recommend that viewpoint 5 is not included as shown within the Neighbourhood Plan.

#### **Viewpoint 6 - From Station Road, Clifton, toward the River Avon open space**

This viewpoint does appear to be on Shakespeare's Avon Way PRow. However, discrepancies exist between the photo location arrow, its description and the photograph included within the Neighbourhood Plan. The photo location and description say from Station Road and mark the arrow halfway down Station Road, but the photograph is taken at the end of Station Road where it turns into a purely pedestrian footpath (see Appendix – figure 4).

This results in ambiguity to where the viewpoint location is intended to be from: the photograph location or the arrow location? Consideration has been given to this through a site visit with three additional panoramic photos being taken to consider Viewpoint 6 within the Neighbourhood Plan (See Appendix - Figure 10 – illustrative viewpoint locations and panoramas).



**Node Viewpoint 4** – From the bottom of Station Road looking north west.

This viewpoint is taken in a similar location to where the photograph of viewpoint 6 within the Neighbourhood Plan is taken. It is however taken as a panorama which shows the view from this location is impacted upon by some modern gates to a residential property that detract from the rural view.

**Node Viewpoint 5** – From Shakespeare’s Avon Way PRow

This viewpoint is taken a short distance further along the PRow from Viewpoint 4. With the exception of the overhead lines, this is a much higher quality view across the River Avon Valley. It is suggested that Viewpoint 6 in the Neighbourhood Plan should be shown in this location as it is a high sensitivity receptor with currently few detracting features to the view, which should be protected.

**Node Viewpoint 6** – From halfway along Station Road

This viewpoint was taken, should it be the case that the intention of Neighbourhood Plan viewpoint 6 relates to the location arrow than the photograph. This panoramic photograph looking north west down Station Road shows a rural road with mature hedges either side and a residential property on the right-hand side. From this viewpoint one does not benefit from an appreciation of the River Avon Valley, as it is screened by mature trees and hedgerows.

If the intention is to protect important views of this river corridor and setting of Clifton upon Dunsmore, then as outlined above, it is suggested that Node viewpoint 5 would be a more appropriate location for viewpoint 6 within the Neighbourhood Plan.

**Viewpoint 7. From River Avon open space, distant view of Clifton upon Dunsmore village**

Again, discrepancies exist between photo location point of Viewpoint 7, the photograph provided, and description included. The photo location appears to be on an informal footpath with 049 important open space (see Appendix figures 1, 7).

The description says view from River Avon open space, distance view of Clifton upon Dunsmore (a text error means that it also refers to Hillmorton Locks, which relates to viewpoint 8). The photograph appears to be taken from a location looking over the River Avon towards open countryside.



The photograph location appears to be set back from the River Avon on an informal path within the important open space. A lack of clarity exists to where this viewpoint location is from.

Consideration has been given to this through a site visit with two additional panoramic photos taken to consider Viewpoint 7 within the Neighbourhood Plan (see Appendix -Figure 10 – illustrative viewpoint locations and panoramas – viewpoints 7, 8).

#### **Node Viewpoint 7** – From Shakespeare’s Avon Way PRoW looking south east

This view shows a panorama from Shakespeare’s Avon Way PRoW looking south east towards Clifton upon Dunsmore. The tarmac road/ walkway detracts from the rural character of the landscape and looks quite formal. Clifton upon Dunsmore is visible on the skyline and woodland copses help screen some of the longer distance views back to the village.

#### **Node Viewpoint 8** – From Important public open space identified in Neighbourhood Plan adjacent to River Avon

This view is adjacent to the River Avon looking south back to Clifton upon Dunsmore. Middle distance views are of Clifton Mill Farm and a wooded valley side to Clifton upon Dunsmore.

As many different views exist from the identified important public space, clarity is required to the exact location with matching panoramic photography. Justification is then required to the importance of the view based on sensitivity and quality.

#### **Potential Mitigation**

It is suggested that the Neighbourhood Plan could acknowledge concerns about views across the River Avon valley and the rural setting of Clifton upon Dunsmore, which could be mitigated through careful design including the following:

- 1) Providing viewing corridors across potential development sites that allow longer distance views of the river Avon Valley to be maintained
- 2) Provision of offset of development and mitigation from both the River Avon and close to Clifton Upon Dunsmore to allow landscape character and views to be maintained with development screened by mitigation planting



## Conclusion

The following provides a brief summary of the conclusions and representations to be made to Clifton upon Dunsmore Neighbourhood Plan from a landscape perspective with specific reference to viewpoints 5, 6 & 7:

- 1) Clarity on criteria for identifying an important view
- 2) Discrepancies between viewpoint location plan, descriptions and photographs
- 3) Deletion of viewpoint 5 as it is not an important view
- 4) Relocation of viewpoint 6 to a location along the Shakespeare's Avon Way which is a higher quality view
- 5) Clarity on the preferred location for viewpoint 7

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 31 October 2025 11:53  
**To:** Local Plan  
**Subject:** Clifton upon Dunsmore Neighbourhood Plan

Dear Sir,

I Would like to have A Say on the above Proposal, I Have Read the Proposal to Build Houses outside the Village of Clifton and I Am Concerned about first:

The Amount of extra Traffic that could be Generated on not only the Roads through the Village but also the Extra Amount of Cars etc. that could also be put onto perhaps an equally busy Road I Am Talking about Newton Manor Lane, it is a Busy Road at the Best of Times (especially Mornings and Afternoons when Schools are in) also Lorries use it as a Short cut sometimes even though there is A Weight limit on it. There used to be A Time when you could Walk along it without the Fear of Getting run over but that as long since gone especially as People use as A Short cut to get to the Leicester Rd. and Retail Park.

Secondly the Area Proposed to Build these Houses also as A Tendency to Flood when it Rains a lot all you have to do is go down and Have a look to see what it looks like After A Heavy Rain Storm and you will see what I mean.

Thank You very much for your time and I Look Forward to the outcome of this Consultation

[REDACTED]



[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

Your Ref  
Our Ref CRTR POL 2025-45321  
Tuesday 28 October 2025

Dear Rugby Borough Council,  
Clifton upon Dunsmore Neighbourhood Plan Regulation 16 Consultation

Thank you for your consultation on the above document.

We are the charity who look after and bring to life 2000 miles of canals and rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.

The Trust has reviewed the draft Neighbourhood Plan and based on the information available we have no comment to make.

Please do not hesitate to contact me with any queries you may have.

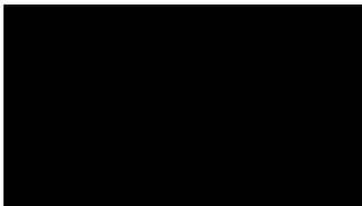
Yours sincerely,

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

**Canal & River Trust Spatial Planning Team**  
[Redacted] [Redacted] [Redacted]



The Coal  
Authority



**For the attention of: Development Strategy Team**

Rugby Borough Council



8 October 2025

Dear Development Strategy Team

**Re: Regulation 16 consultation on the Clifton upon Dunsmore Neighbourhood Plan**

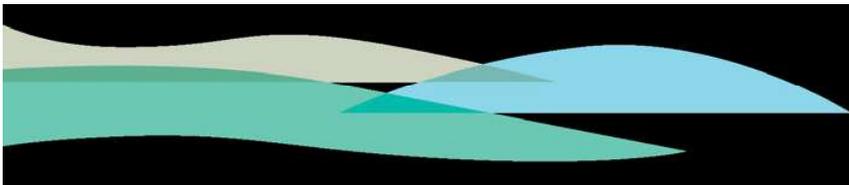
Thank you for your notification of 23 September 2025 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

However, the area to which this consultation relates is not located within the defined coalfield. On this basis we have no specific comments to make.

Yours

**The Coal Authority Planning Team**



Making a **better future** for people  
and the environment **in mining areas**



[Redacted]

[Redacted]

31 October 2025

[Redacted]

Ref: Clifton upon Dunsmore Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

[Redacted signature]



[Redacted]



Historic England



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*

28 October 2025

[REDACTED]



[REDACTED]

Dear Sirs

### **Clifton upon Dunsmore – Neighbourhood Plan**

Williams Gallagher is instructed to submit these representations to the Neighbourhood Plan (“NP”) on behalf of Inside Land Group Ltd (“ILG”) who are promoters of the land at Newton Road, Clifton upon Dunsmore which has been identified for housing development as Site 202 in the Reg 18 Rugby Borough Local Plan – Preferred Options Consultation (March 2025) (“RBLP”).

ILG are supportive of the NP with the following exception.

The emerging RBLP seeks to guide development over the period 2014-2045. Site 202 forms one of three sites identified for housing in Clifton upon Dunsmore as a contribution to achieving the identified housing need. ILG has previously submitted representations in support of the Site 202 to the RBLP consultation. The RBLP proposes Settlement Boundaries for settlements and seeks to control development outside of these defined boundaries.

ILG notes that the timetable to prepare the RBLP identifies the following:

- Reg 19 Consultation – January 2026
- Submission – June 2026
- Adoption – June 2027

Whilst the aim is to potentially have the NP made before the end of 2025 or in early 2026. Once made the NP would form part, and be the most up-to-date component, of the Development Plan for the borough. Where relevant, its provisions would outweigh those of the current Borough Local Plan.

The NP has been prepared to cover the period up to 2040. Para 5 of the NP states:

*“The Neighbourhood Plan covers the period 2011 – 2041, in line with the emerging Rugby Local Plan.”*

ILG notes the proposed NP plan period but the RBLP seeks to provide for a longer period. ILG therefore questions whether it may be more appropriate for the NP to cover the same period. This would not necessarily require any further allocations in the NP.

Being “in line” with the RBLP, the NP does not propose any additional allocations for housing to those being identified through the emerging RBLP. This is clear from para 4.31 of the NP. The Development Strategy for the NP therefore relies upon that within the extant local plan and that of the emerging RBLP.

The extant local plan (2019) establishes Clifton upon Dunsmore as a second tier settlement within which development may be permitted within the existing boundaries and on allocated sites (Policy GP2). Outside of these defined boundaries, land is deemed to be in the countryside within which new development will be resisted.

The existing Settlement boundary as defined in the 2019 local plan is tightly drawn around the existing built-up area of the village and excludes the areas of land proposed as housing allocations through the RBLP. Neither the RBLP nor the NP seek to amend the proposed Settlement Boundary to reflect the proposed allocations.

[REDACTED]

Until such time that the RBLP is adopted, development of the Site would technically be contrary to the provisions of the Development Plan as none of the policies in the NP provide for its development. For instance, Policy G1 defines proposed Settlement Boundaries but does not seek to extend them to include the development Sites identified in the RBLP. There will therefore be period between the adoption of the NP and the RBLP within which proposals for development of the three proposed housing allocations for Clifton upon Dunsmore would be contrary to the Development Plan. At a time when there is pressing need to deliver housing, this position would seem inappropriate given their current status as preferred allocations.

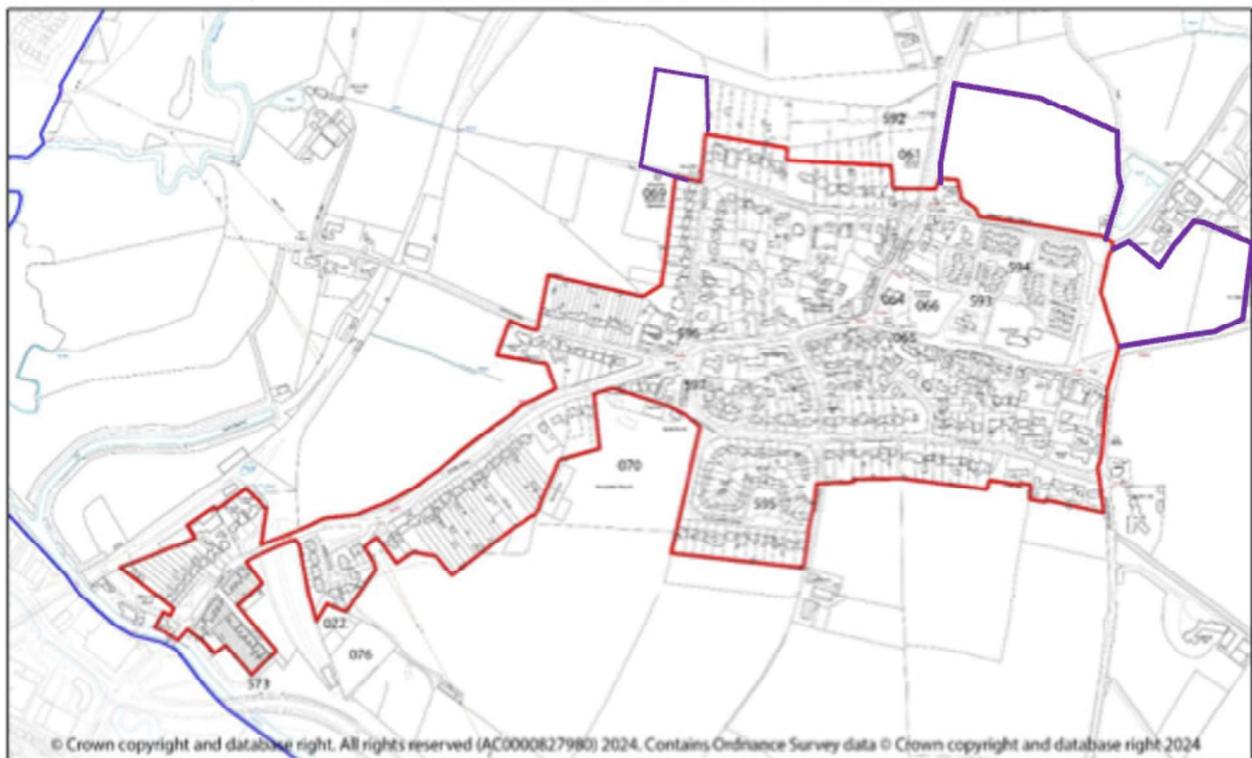
ILG would therefore recommend that in order to make the NP sound, the wording of Policy G1 be amended as follows (new wording proposed in **bold**):

**POLICY G1: SETTLEMENT BOUNDARIES – Development proposals within the Neighbourhood Area will be supported on sites within the settlement boundaries as shown in Figure 2 and Figure 3 where the proposal complies with the policies in this Neighbourhood Plan or proposed as a Site Allocation in the emerging Rugby Borough Local Plan.**

Land outside the defined settlement boundaries will be treated as open countryside, where development will be carefully controlled in line with local and national strategic planning policies.

OR if deemed more appropriate, no wording change to the Policy, but a change made to the Settlement Boundary as defined in Figure 2 to include the areas of the proposed RBLP housing allocations identified using the **line** as follows:

**Figure 2 - Settlement boundary for Clifton upon Dunsmore village**



Please provide a copy of these comments to Examiner of the NP

Please notify us of the local planning authority's decision under regulation 19 in relation to the neighbourhood development plan

[REDACTED]

[REDACTED]

[REDACTED]

Planning Policy  
Rugby Borough Council



By email 

04 November 2025

Our Ref: 40706a

Dear Sir/Madam,

**Representations to the Submission Version Clifton upon Dunsmore Parish Neighbourhood Plan 2011-2031 (Regulation 16) (November 2025)**

These representations to the Clifton upon Dunsmore Draft Neighbourhood Plan – Regulation 16 have been prepared by Nexus Planning, on behalf of Mackenzie Miller Homes, who control approximately 8.5 hectares (ha) of land south of Lilbourne Road, Clifton upon Dunsmore (“the Site”). The Site Location Plan and Illustrative Framework Plan have been submitted alongside this representation.

Mackenzie Miller Homes are a small-medium sized housebuilder that specialises in building premium homes across Warwickshire and The Cotswolds.

Rugby Borough Council recently consulted on their Preferred Options Consultation Document in May 2025. Mackenzie Miller Homes are currently promoting the Site for residential development as part of this process.

These representations have been prepared in the context of the particular land interest of Mackenzie Miller Homes but are provided in support of the preparation of a soundly based and sustainable policy framework for the Neighbourhood Plan area in the context of the emerging development plan spatial strategy.

Policy G1 Settlement Boundaries

Despite potential options having been identified within the Preferred Options Consultation Document, it is acknowledged that the specific sites to be allocated remain unclear. Consequently, amending the Clifton upon Dunsmore Settlement Boundary at this stage would be premature. It is therefore recommended that flexibility be incorporated into Policy G1 to accommodate future site allocations within the emerging Rugby Local Plan.

Accordingly, Policy G1 should be amended as follows:



*“Development proposals within the Neighbourhood Plan Area will be supported on sites within the settlement boundaries as shown in Figure 2 and Figure 3 and on sites allocated for development within the Rugby Local Plan where the proposal complies with the policies in this Neighbourhood Plan.”*

#### Policy H1 Housing Mix

Mackenzie Miller Homes welcomes the approach taken within Policy H1, particularly the decision not to impose prescriptive housing mix targets. The Housing Needs Assessment is considered to provide a useful backdrop that appropriately reflects the type and size of housing required, having regard to local demographic trends. The recognition and support for schemes incorporating bungalows and larger dwellings (four bedrooms or more), where these remain subservient in overall quantum, is noted and welcomed.

Mackenzie Miller Homes also concurs with the conclusions of the Housing Needs Assessment, which recommend that the Neighbourhood Plan Advisory Committee should closely monitor strategies and policy documents produced by the Government, Rugby Borough Council, or other relevant bodies that may influence housing policy. The Committee should then review the Neighbourhood Plan as necessary to ensure continued general conformity. It is considered that this principle should be explicitly referenced within the supporting text to Policy H1.

It should also be noted that the emerging proposals for the Mackenzie Miller Homes site include the provision of bungalows, which will directly contribute towards meeting the identified housing needs of the local demographic.

#### Policy ENV2 Sites and Features of Natural Environment Significance

The principle of this policy is supported. However, it is unnecessary to replicate the provisions of national policy, as set out in the Environment Act 2021, within the policy wording of the Neighbourhood Plan. A minimum Biodiversity Net Gain (BNG) of 10% is now mandatory. This national requirement can be explained within the supporting text to the policy, with the policy itself focusing on the local approach to facilitating and supporting compliance.

Mackenzie Miller Homes wishes to confirm that the emerging proposals for the site will deliver a net gain exceeding 10%.

#### Policy ENV7 Important Views

The principle of this policy is supported; however, the supporting text currently lacks sufficient evidence or justification to demonstrate why the identified viewpoints are of particular significance. In order for a robust assessment to be made, the fieldwork and consultation findings referenced should be published and made publicly accessible. The existing evidence base, comprising primarily photographs and brief descriptive notes, is not considered sufficient to substantiate the inclusion of this policy within the Neighbourhood Plan.

It is further noted that, as illustrated on the Illustrative Framework Plan, the emerging proposals for the Mackenzie Miller Homes site would not adversely affect any of the identified Important Views. Accordingly, the proposed development would remain consistent with the overarching intent of this policy.

The policy on Important Views has the potential to meet the basic conditions, as it aligns with national policy on landscape protection and contributes to sustainable development by safeguarding valued local assets. However, the supporting text currently lacks sufficient evidence to justify the significance of the identified viewpoints. Publishing the

underlying fieldwork and consultation findings would strengthen the policy, demonstrating that it is locally justified, proportionate, and consistent with both national and local planning policy.

#### Policy ENV9 Flood Risk Resilience and Climate Change

Mackenzie Miller Homes raises significant concerns regarding Policy ENV9 as currently drafted, which is considered both unnecessary and unjustified. The National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG), and the Rugby Local Plan already provide a clear and well-established framework for assessing flood risk, particularly in areas susceptible to flooding.

As drafted, Policy ENV9 requires that development proposals demonstrate that the benefits of development outweigh any harm arising from adverse flood impacts within the site or adjacent land. This approach presumes that all development adjacent to flood risk areas would result in adverse impacts, which is not supported by evidence. Major development proposals are already subject to rigorous site-specific flood risk assessments and drainage strategies to ensure that they are safe and would not exacerbate flooding elsewhere. Where such assessments confirm the absence of adverse impact, there is no requirement for further consideration within the planning balance.

The approach set out in Policy ENV9 therefore goes beyond the requirements of the NPPF, NPPG, and the Development Plan, and it is not supported by evidence to justify the additional requirement. As such, Policy ENV9 is considered to fail to meet basic conditions (a) and (e), as it does not conform with national policy nor maintain general conformity with the Development Plan.

Should the Parish Council wish to retain the policy in its current form, it would be necessary to provide robust, site-specific evidence demonstrating the justification for this more restrictive approach.

Mackenzie Miller Homes has prepared a drainage strategy that ensures the site is safe and does not exacerbate flood risk elsewhere, which underpins the Illustrative Framework Plan.

#### Policy CF2 New or Improved Community Facilities

Mackenzie Miller Homes notes that the community of Clifton upon Dunsmore is keen to develop or enhance community facilities to meet the growing needs of local residents. Policy CF2 states that proposals which improve the quality and/or range of community facilities will be supported.

As part of their emerging proposals, Mackenzie Miller Homes have included an indicative area for community use. This could accommodate, but is not limited to, a new village hall with appropriate parking, an expanded play area, and/or allotments. Alternatively, should the Parish Council not wish to take this space, Mackenzie Miller Homes agree in principle to provide off-site contributions towards the improvement of existing community facilities within the village.

#### Conclusions

Mackenzie Miller Homes Ltd supports the Clifton upon Dunsmore Neighbourhood Plan and recognises the value of its role in shaping future development within the village. However, we consider that there are several areas in the draft Plan where the policies, as currently drafted, do not fully meet the basic conditions. Addressing these matters at this stage is essential to ensure that the Neighbourhood Plan can progress successfully towards adoption, provide a clear and consistent policy framework for future development, and remain up to date following the adoption of the Rugby Local Plan Review.

As demonstrated throughout this representation, the emerging proposals for the Mackenzie Miller Homes site have been prepared to align with the overarching objectives and aspirations of the draft Neighbourhood Plan. This includes the consideration of housing mix, community facilities, biodiversity, flood risk management, and the protection of important views, ensuring that the development is consistent with the Plan's vision for the sustainable growth of the village.

We would welcome the opportunity to engage further with the Parish Council to discuss these matters and to provide any additional information or clarification as required. We respectfully request that our comments are carefully considered as part of the ongoing preparation of the Neighbourhood Plan. Should there be any queries regarding the points raised in this representation, please do not hesitate to contact us.

Yours sincerely

[Redacted signature block]

[Redacted text block]

[Redacted text block]

[Redacted text block]







**Illustrative Framework Masterplan**

WWW.MACKENZIE.COM ARCHITECTURE URBAN DESIGN LANDSCAPE PLANNING LANDSCAPE ARCHITECTURE & ENVIRONMENT

27 BOND STREET, COVINGTON, LA 70424  
 T: +1 504 752 7000 E: info@mackenzie.com  
 The information contained in this document is confidential and intended for the use of the recipient only. It is not to be distributed or made available to other persons, by any means, without the prior written consent of Mackenzie Miller Homes. If you are not the intended recipient, you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, please notify the sender immediately by e-mail. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. If you are the named addressee you should not disseminate, distribute or copy this e-mail. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. If you are not the named addressee you should not disseminate, distribute or copy this e-mail.

D Landscape masterplan of illustrative framework  
 15/03/25 - 17/03/25  
 18/03/25 - 21/03/25  
 22/03/25 - 24/03/25  
 25/03/25 - 27/03/25  
 28/03/25 - 30/03/25  
 31/03/25 - 01/04/25  
 02/04/25 - 04/04/25  
 05/04/25 - 07/04/25  
 08/04/25 - 10/04/25  
 11/04/25 - 13/04/25  
 14/04/25 - 16/04/25  
 17/04/25 - 19/04/25  
 20/04/25 - 22/04/25  
 23/04/25 - 25/04/25  
 26/04/25 - 28/04/25  
 29/04/25 - 01/05/25  
 02/05/25 - 04/05/25  
 05/05/25 - 07/05/25  
 08/05/25 - 10/05/25  
 11/05/25 - 13/05/25  
 14/05/25 - 16/05/25  
 17/05/25 - 19/05/25  
 20/05/25 - 22/05/25  
 23/05/25 - 25/05/25  
 26/05/25 - 28/05/25  
 29/05/25 - 31/05/25  
 01/06/25 - 03/06/25  
 04/06/25 - 06/06/25  
 07/06/25 - 09/06/25  
 10/06/25 - 12/06/25  
 13/06/25 - 15/06/25  
 16/06/25 - 18/06/25  
 19/06/25 - 21/06/25  
 22/06/25 - 24/06/25  
 25/06/25 - 27/06/25  
 28/06/25 - 30/06/25  
 01/07/25 - 03/07/25  
 04/07/25 - 06/07/25  
 07/07/25 - 09/07/25  
 10/07/25 - 12/07/25  
 13/07/25 - 15/07/25  
 16/07/25 - 18/07/25  
 19/07/25 - 21/07/25  
 22/07/25 - 24/07/25  
 25/07/25 - 27/07/25  
 28/07/25 - 30/07/25  
 31/07/25 - 02/08/25  
 03/08/25 - 05/08/25  
 06/08/25 - 08/08/25  
 09/08/25 - 11/08/25  
 12/08/25 - 14/08/25  
 15/08/25 - 17/08/25  
 18/08/25 - 20/08/25  
 21/08/25 - 23/08/25  
 24/08/25 - 26/08/25  
 27/08/25 - 29/08/25  
 30/08/25 - 31/08/25  
 01/09/25 - 03/09/25  
 04/09/25 - 06/09/25  
 07/09/25 - 09/09/25  
 10/09/25 - 12/09/25  
 13/09/25 - 15/09/25  
 16/09/25 - 18/09/25  
 19/09/25 - 21/09/25  
 22/09/25 - 24/09/25  
 25/09/25 - 27/09/25  
 28/09/25 - 30/09/25  
 01/10/25 - 03/10/25  
 04/10/25 - 06/10/25  
 07/10/25 - 09/10/25  
 10/10/25 - 12/10/25  
 13/10/25 - 15/10/25  
 16/10/25 - 18/10/25  
 19/10/25 - 21/10/25  
 22/10/25 - 24/10/25  
 25/10/25 - 27/10/25  
 28/10/25 - 30/10/25  
 31/10/25 - 02/11/25  
 03/11/25 - 05/11/25  
 06/11/25 - 08/11/25  
 09/11/25 - 11/11/25  
 12/11/25 - 14/11/25  
 15/11/25 - 17/11/25  
 18/11/25 - 20/11/25  
 21/11/25 - 23/11/25  
 24/11/25 - 26/11/25  
 27/11/25 - 29/11/25  
 30/11/25 - 02/12/25  
 03/12/25 - 05/12/25  
 06/12/25 - 08/12/25  
 09/12/25 - 11/12/25  
 12/12/25 - 14/12/25  
 15/12/25 - 17/12/25  
 18/12/25 - 20/12/25  
 21/12/25 - 23/12/25  
 24/12/25 - 26/12/25  
 27/12/25 - 29/12/25  
 30/12/25 - 01/01/26  
 02/01/26 - 04/01/26  
 05/01/26 - 07/01/26  
 08/01/26 - 10/01/26  
 11/01/26 - 13/01/26  
 14/01/26 - 16/01/26  
 17/01/26 - 19/01/26  
 20/01/26 - 22/01/26  
 23/01/26 - 25/01/26  
 26/01/26 - 28/01/26  
 29/01/26 - 31/01/26  
 01/02/26 - 03/02/26  
 04/02/26 - 06/02/26  
 07/02/26 - 09/02/26  
 10/02/26 - 12/02/26  
 13/02/26 - 15/02/26  
 16/02/26 - 18/02/26  
 19/02/26 - 21/02/26  
 22/02/26 - 24/02/26  
 25/02/26 - 27/02/26  
 28/02/26 - 01/03/26  
 02/03/26 - 04/03/26  
 05/03/26 - 07/03/26  
 08/03/26 - 10/03/26  
 11/03/26 - 13/03/26  
 14/03/26 - 16/03/26  
 17/03/26 - 19/03/26  
 20/03/26 - 22/03/26  
 23/03/26 - 25/03/26  
 26/03/26 - 28/03/26  
 29/03/26 - 31/03/26  
 01/04/26 - 03/04/26  
 04/04/26 - 06/04/26  
 07/04/26 - 09/04/26  
 10/04/26 - 12/04/26  
 13/04/26 - 15/04/26  
 16/04/26 - 18/04/26  
 19/04/26 - 21/04/26  
 22/04/26 - 24/04/26  
 25/04/26 - 27/04/26  
 28/04/26 - 30/04/26  
 01/05/26 - 03/05/26  
 04/05/26 - 06/05/26  
 07/05/26 - 09/05/26  
 10/05/26 - 12/05/26  
 13/05/26 - 15/05/26  
 16/05/26 - 18/05/26  
 19/05/26 - 21/05/26  
 22/05/26 - 24/05/26  
 25/05/26 - 27/05/26  
 28/05/26 - 30/05/26  
 31/05/26 - 02/06/26  
 03/06/26 - 05/06/26  
 06/06/26 - 08/06/26  
 09/06/26 - 11/06/26  
 12/06/26 - 14/06/26  
 15/06/26 - 17/06/26  
 18/06/26 - 20/06/26  
 21/06/26 - 23/06/26  
 24/06/26 - 26/06/26  
 27/06/26 - 29/06/26  
 30/06/26 - 02/07/26  
 03/07/26 - 05/07/26  
 06/07/26 - 08/07/26  
 09/07/26 - 11/07/26  
 12/07/26 - 14/07/26  
 15/07/26 - 17/07/26  
 18/07/26 - 20/07/26  
 21/07/26 - 23/07/26  
 24/07/26 - 26/07/26  
 27/07/26 - 29/07/26  
 30/07/26 - 31/07/26  
 01/08/26 - 03/08/26  
 04/08/26 - 06/08/26  
 07/08/26 - 09/08/26  
 10/08/26 - 12/08/26  
 13/08/26 - 15/08/26  
 16/08/26 - 18/08/26  
 19/08/26 - 21/08/26  
 22/08/26 - 24/08/26  
 25/08/26 - 27/08/26  
 28/08/26 - 30/08/26  
 31/08/26 - 02/09/26  
 03/09/26 - 05/09/26  
 06/09/26 - 08/09/26  
 09/09/26 - 11/09/26  
 12/09/26 - 14/09/26  
 15/09/26 - 17/09/26  
 18/09/26 - 20/09/26  
 21/09/26 - 23/09/26  
 24/09/26 - 26/09/26  
 27/09/26 - 29/09/26  
 30/09/26 - 02/10/26  
 03/10/26 - 05/10/26  
 06/10/26 - 08/10/26  
 09/10/26 - 11/10/26  
 12/10/26 - 14/10/26  
 15/10/26 - 17/10/26  
 18/10/26 - 20/10/26  
 21/10/26 - 23/10/26  
 24/10/26 - 26/10/26  
 27/10/26 - 29/10/26  
 30/10/26 - 31/10/26  
 01/11/26 - 03/11/26  
 04/11/26 - 06/11/26  
 07/11/26 - 09/11/26  
 10/11/26 - 12/11/26  
 13/11/26 - 15/11/26  
 16/11/26 - 18/11/26  
 19/11/26 - 21/11/26  
 22/11/26 - 24/11/26  
 25/11/26 - 27/11/26  
 28/11/26 - 30/11/26  
 31/11/26 - 02/12/26  
 03/12/26 - 05/12/26  
 06/12/26 - 08/12/26  
 09/12/26 - 11/12/26  
 12/12/26 - 14/12/26  
 15/12/26 - 17/12/26  
 18/12/26 - 20/12/26  
 21/12/26 - 23/12/26  
 24/12/26 - 26/12/26  
 27/12/26 - 29/12/26  
 30/12/26 - 01/01/27  
 02/01/27 - 04/01/27  
 05/01/27 - 07/01/27  
 08/01/27 - 10/01/27  
 11/01/27 - 13/01/27  
 14/01/27 - 16/01/27  
 17/01/27 - 19/01/27  
 20/01/27 - 22/01/27  
 23/01/27 - 25/01/27  
 26/01/27 - 28/01/27  
 29/01/27 - 31/01/27  
 01/02/27 - 03/02/27  
 04/02/27 - 06/02/27  
 07/02/27 - 09/02/27  
 10/02/27 - 12/02/27  
 13/02/27 - 15/02/27  
 16/02/27 - 18/02/27  
 19/02/27 - 21/02/27  
 22/02/27 - 24/02/27  
 25/02/27 - 27/02/27  
 28/02/27 - 01/03/27  
 02/03/27 - 04/03/27  
 05/03/27 - 07/03/27  
 08/03/27 - 10/03/27  
 11/03/27 - 13/03/27  
 14/03/27 - 16/03/27  
 17/03/27 - 19/03/27  
 20/03/27 - 22/03/27  
 23/03/27 - 25/03/27  
 26/03/27 - 28/03/27  
 29/03/27 - 31/03/27  
 01/04/27 - 03/04/27  
 04/04/27 - 06/04/27  
 07/04/27 - 09/04/27  
 10/04/27 - 12/04/27  
 13/04/27 - 15/04/27  
 16/04/27 - 18/04/27  
 19/04/27 - 21/04/27  
 22/04/27 - 24/04/27  
 25/04/27 - 27/04/27  
 28/04/27 - 30/04/27  
 31/04/27 - 02/05/27  
 03/05/27 - 05/05/27  
 06/05/27 - 08/05/27  
 09/05/27 - 11/05/27  
 12/05/27 - 14/05/27  
 15/05/27 - 17/05/27  
 18/05/27 - 20/05/27  
 21/05/27 - 23/05/27  
 24/05/27 - 26/05/27  
 27/05/27 - 29/05/27  
 30/05/27 - 31/05/27  
 01/06/27 - 03/06/27  
 04/06/27 - 06/06/27  
 07/06/27 - 09/06/27  
 10/06/27 - 12/06/27  
 13/06/27 - 15/06/27  
 16/06/27 - 18/06/27  
 19/06/27 - 21/06/27  
 22/06/27 - 24/06/27  
 25/06/27 - 27/06/27  
 28/06/27 - 30/06/27  
 31/06/27 - 02/07/27  
 03/07/27 - 05/07/27  
 06/07/27 - 08/07/27  
 09/07/27 - 11/07/27  
 12/07/27 - 14/07/27  
 15/07/27 - 17/07/27  
 18/07/27 - 20/07/27  
 21/07/27 - 23/07/27  
 24/07/27 - 26/07/27  
 27/07/27 - 29/07/27  
 30/07/27 - 31/07/27  
 01/08/27 - 03/08/27  
 04/08/27 - 06/08/27  
 07/08/27 - 09/08/27  
 10/08/27 - 12/08/27  
 13/08/27 - 15/08/27  
 16/08/27 - 18/08/27  
 19/08/27 - 21/08/27  
 22/08/27 - 24/08/27  
 25/08/27 - 27/08/27  
 28/08/27 - 30/08/27  
 31/08/27 - 02/09/27  
 03/09/27 - 05/09/27  
 06/09/27 - 08/09/27  
 09/09/27 - 11/09/27  
 12/09/27 - 14/09/27  
 15/09/27 - 17/09/27  
 18/09/27 - 20/09/27  
 21/09/27 - 23/09/27  
 24/09/27 - 26/09/27  
 27/09/27 - 29/09/27  
 30/09/27 - 02/10/27  
 03/10/27 - 05/10/27  
 06/10/27 - 08/10/27  
 09/10/27 - 11/10/27  
 12/10/27 - 14/10/27  
 15/10/27 - 17/10/27  
 18/10/27 - 20/10/27  
 21/10/27 - 23/10/27  
 24/10/27 - 26/10/27  
 27/10/27 - 29/10/27  
 30/10/27 - 31/10/27  
 01/11/27 - 03/11/27  
 04/11/27 - 06/11/27  
 07/11/27 - 09/11/27  
 10/11/27 - 12/11/27  
 13/11/27 - 15/11/27  
 16/11/27 - 18/11/27  
 19/11/27 - 21/11/27  
 22/11/27 - 24/11/27  
 25/11/27 - 27/11/27  
 28/11/27 - 30/11/27  
 31/11/27 - 02/12/27  
 03/12/27 - 05/12/27  
 06/12/27 - 08/12/27  
 09/12/27 - 11/12/27  
 12/12/27 - 14/12/27  
 15/12/27 - 17/12/27  
 18/12/27 - 20/12/27  
 21/12/27 - 23/12/27  
 24/12/27 - 26/12/27  
 27/12/27 - 29/12/27  
 30/12/27 - 01/01/28  
 02/01/28 - 04/01/28  
 05/01/28 - 07/01/28  
 08/01/28 - 10/01/28  
 11/01/28 - 13/01/28  
 14/01/28 - 16/01/28  
 17/01/28 - 19/01/28  
 20/01/28 - 22/01/28  
 23/01/28 - 25/01/28  
 26/01/28 - 28/01/28  
 29/01/28 - 31/01/28  
 01/02/28 - 03/02/28  
 04/02/28 - 06/02/28  
 07/02/28 - 09/02/28  
 10/02/28 - 12/02/28  
 13/02/28 - 15/02/28  
 16/02/28 - 18/02/28  
 19/02/28 - 21/02/28  
 22/02/28 - 24/02/28  
 25/02/28 - 27/02/28  
 28/02/28 - 01/03/28  
 02/03/28 - 04/03/28  
 05/03/28 - 07/03/28  
 08/03/28 - 10/03/28  
 11/03/28 - 13/03/28  
 14/03/28 - 16/03/28  
 17/03/28 - 19/03/28  
 20/03/28 - 22/03/28  
 23/03/28 - 25/03/28  
 26/03/28 - 28/03/28  
 29/03/28 - 31/03/28  
 01/04/28 - 03/04/28  
 04/04/28 - 06/04/28  
 07/04/28 - 09/04/28  
 10/04/28 - 12/04/28  
 13/04/28 - 15/04/28  
 16/04/28 - 18/04/28  
 19/04/28 - 21/04/28  
 22/04/28 - 24/04/28  
 25/04/28 - 27/04/28  
 28/04/28 - 30/04/28  
 31/04/28 - 02/05/28  
 03/05/28 - 05/05/28  
 06/05/28 - 08/05/28  
 09/05/28 - 11/05/28  
 12/05/28 - 14/05/28  
 15/05/28 - 17/05/28  
 18/05/28 - 20/05/28  
 21/05/28 - 23/05/28  
 24/05/28 - 26/05/28  
 27/05/28 - 29/05/28  
 30/05/28 - 31/05/28  
 01/06/28 - 03/06/28  
 04/06/28 - 06/06/28  
 07/06/28 - 09/06/28  
 10/06/28 - 12/06/28  
 13/06/28 - 15/06/28  
 16/06/28 - 18/06/28  
 19/06/28 - 21/06/28  
 22/06/28 - 24/06/28  
 25/06/28 - 27/06/28  
 28/06/28 - 30/06/28  
 31/06/28 - 02/07/28  
 03/07/28 - 05/07/28  
 06/07/28 - 08/07/28  
 09/07/28 - 11/07/28  
 12/07/28 - 14/07/28  
 15/07/28 - 17/07/28  
 18/07/28 - 20/07/28  
 21/07/28 - 23/07/28  
 24/07/28 - 26/07/28  
 27/07/28 - 29/07/28  
 30/07/28 - 31/07/28  
 01/08/28 - 03/08/28  
 04/08/28 - 06/08/28  
 07/08/28 - 09/08/28  
 10/08/28 - 12/08/28  
 13/08/28 - 15/08/28  
 16/08/28 - 18/08/28  
 19/08/28 - 21/08/28  
 22/08/28 - 24/08/28  
 25/08/28 - 27/08/28  
 28/08/28 - 30/08/28  
 31/08/28 - 02/09/28  
 03/09/28 - 05/09/28  
 06/09/28 - 08/09/28  
 09/09/28 - 11/09/28  
 12/09/28 - 14/09/28  
 15/09/28 - 17/09/28  
 18/09/28 - 20/09/28  
 21/09/28 - 23/09/28  
 24/09/28 - 26/09/28  
 27/09/28 - 29/09/28  
 30/09/28 - 02/10/28  
 03/10/28 - 05/10/28  
 06/10/28 - 08/10/28  
 09/10/28 - 11/10/28  
 12/10/28 - 14/10/28  
 15/10/28 - 17/10/28  
 18/10/28 - 20/10/28  
 21/10/28 - 23/10/28  
 24/10/28 - 26/10/28  
 27/10/28 - 29/10/28  
 30/10/28 - 31/10/28  
 01/11/28 - 03/11/28  
 04/11/28 - 06/11/28  
 07/11/28 - 09/11/28  
 10/11/28 - 12/11/28  
 13/11/28 - 15/11/28  
 16/11/28 - 18/11/28  
 19/11/28 - 21/11/28  
 22/11/28 - 24/11/28  
 25/11/28 - 27/11/28  
 28/11/28 - 30/11/28  
 31/11/28 - 02/12/28  
 03/12/28 - 05/12/28  
 06/12/28 - 08/12/28  
 09/12/28 - 11/12/28  
 12/12/28 - 14/12/28  
 15/12/28 - 17/12/28  
 18/12/28 - 20/12/28  
 21/12/28 - 23/12/28  
 24/12/28 - 26/12/28  
 27/12/28 - 29/12/28  
 30/12/28 - 01/01/29  
 02/01/29 - 04/01/29  
 05/01/29 - 07/01/29  
 08/01/29 - 10/01/29  
 11/01/29 - 13/01/29  
 14/01/29 - 16/01/29  
 17/01/29 - 19/01/29  
 20/01/29 - 22/01/29  
 23/01/29 - 25/01/29  
 26/01/29 - 28/01/29  
 29/01/29 - 31/01/29  
 01/02/29 - 03/02/29  
 04/02/29 - 06/02/29  
 07/02/29 - 09/02/29  
 10/02/29 - 12/02/29  
 13/02/29 - 15/02/29  
 16/02/29 - 18/02/29  
 19/02/29 - 21/02/29  
 22/02/29 - 24/02/29  
 25/02/29 - 27/02/29  
 28/02/29 - 01/03/29  
 02/03/29 - 04/03/29  
 05/03/29 - 07/03/29  
 08/03/29 - 10/03/29  
 11/03/29 - 13/03/29  
 14/03/29 - 16/03/29  
 17/03/29 - 19/03/29  
 20/03/29 - 22/03/29  
 23/03/29 - 25/03/29  
 26/03/29 - 28/03/29  
 29/03/29 - 31/03/29  
 01/04/29 - 03/04/29  
 04/04/29 - 06/04/29  
 07/04/29 - 09/04/29  
 10/04/29 - 12/04/29  
 13/04/29 - 15/04/29  
 16/04/29 - 18/04/29  
 19/04/29 - 21/04/29  
 22/04/29 - 24/04/29  
 25/04/29 - 27/04/29  
 28/04/29 - 30/04/29  
 31/04/29 - 02/05/29  
 03/05/29 - 05/05/29  
 06/05/29 - 08/05/29  
 09/05/29 - 11/05/

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 24 September 2025 08:58  
**To:** Local Plan  
**Subject:** RE: Public Consultation - Clifton upon Dunsmore Neighbourhood Plan

Hi,

Thank you for your email.

Regarding planning application at site location Clifton upon Dunsmore Neighbourhood Plan there are no National Gas assets affected in this area.

If you would like to view if there are any other affected assets in this area, please raise an enquiry with [www.lsbud.co.uk](http://www.lsbud.co.uk). Additionally, if the location or works type changes, please raise an enquiry.

Kind regards

[REDACTED]

[REDACTED]



[REDACTED]

**Please consider the environment before printing this email.**

---

**From:** Local Plan  
**Sent:** 23 September 2025 12:01  
**To:** Local Plan  
**Subject:** Public Consultation - Clifton upon Dunsmore Neighbourhood Plan

**[EXTERNAL EMAIL]** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe. If you suspect this email is malicious, please use the 'Report Phish'.

Dear consultee

**Neighbourhood Planning Regulations (General) 2012 (as amended)**

## Regulation 16 consultation on the Clifton upon Dunsmore Neighbourhood Plan

A neighbourhood plan has been prepared by Clifton upon Dunsmore Parish Council in consultation with the local community. Following a public consultation run by the Parish Council earlier this year (in accordance with the Neighbourhood Planning Regulations), the Clifton upon Dunsmore Neighbourhood Plan has been submitted to Rugby Borough Council as the Local Planning Authority. In accordance with Regulation 16 of the Neighbourhood Planning Regulations (General) 2012 (as amended), the submitted Clifton upon Dunsmore Neighbourhood Plan is now subject to a period of public consultation.

Copies of the consultation documents, including the Submission Version of the Clifton upon Dunsmore Neighbourhood Plan are available [here](#).

Alternatively, hard copies of the documents are available to view in the following locations within normal opening hours:

- [REDACTED]
- [REDACTED]

Consultation responses can be sent via:

- 1) email to [REDACTED] with 'Clifton upon Dunsmore Neighbourhood Plan' in the subject line, or
- 2) by post to:

[REDACTED]

Please note, if you submit a response by email you do not need to submit a paper copy as well. Consultation responses will be made available for public inspection.

Any representation to the consultation may include a request to be notified of the local planning authority's decision under regulation 19 in relation to the neighbourhood development plan.

You have received this email because your contact details are held on our consultation database, or you have previously been consulted regarding the Clifton upon Dunsmore Neighbourhood Plan (as set out in the submitted Consultation Statement). If you wish to have your details removed from our database, please contact us.

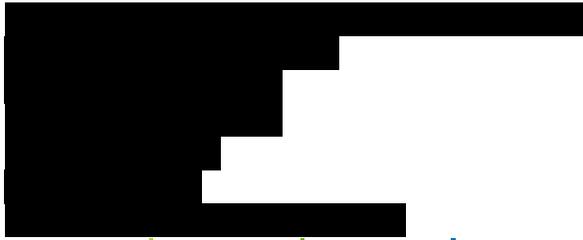
To view the council's privacy notice please visit:

[REDACTED]

Should you require any further information, please contact the Development Strategy team.

Regards,

[REDACTED]



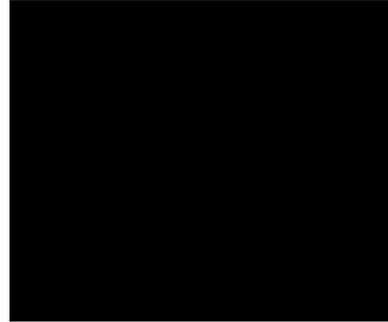
---

This e-mail, and any attachments are strictly confidential and intended for the addressee(s) only. The content may also contain legal, professional or other privileged information. If you are not the intended recipient, please notify the sender immediately and then delete the e-mail and any attachments. You should not disclose, copy or take any action in reliance on this transmission.

You may report the matter by contacting us via our [National Gas Transmission Contacts Page](#).

Please ensure you have adequate virus protection before you open or detach any documents from this transmission. National Gas Transmission and its affiliates do not accept any liability for viruses. An e-mail reply to this address may be subject to monitoring for operational reasons or lawful business practices.

For the registered information on National Gas Transmission please use the attached link: <https://nationalgas.com/about-us/corporate-registrations>.



Dear Sir or Madam,

**Clifton upon Dunsmore Neighbourhood Plan (Regulation 16)**

Thank you for consulting National Highways on the Clifton upon Dunsmore Neighbourhood Plan review.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In responding to Local Plan consultations, we have regard to DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of local plans. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

We note that the SRN in closest proximity to the plan area is the M6 and A5.

Following our review of the Neighbourhood Plan, we confirm that at this stage, National Highways does not have any specific comments to make. However, we consider that the Parish Council should recommend that Transport Statements and/or Transport Assessments should be undertaken for any proposed housing and employment developments within the NDP area where the development is relatively large scale to allow us to assess the traffic impacts on the SRN.

If I can be of any further assistance on this matter, please do not hesitate in contacting me.



Date: 21 October 2025  
Our ref: 527742  
Your ref: Clifton upon Dunsmore Neighbourhood Plan



NATURAL  
ENGLAND


## Clifton upon Dunsmore Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 23 September 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

### **Natural England does not have any specific comments on this draft neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).


## Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://www.associationoflocalenvironmentalrecordscentres.org/).

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>2</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>3</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)<sup>4</sup> website and also from the [LandIS website](http://www.landis.org.uk/)<sup>5</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework)<sup>6</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)<sup>7</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

---

<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>3</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>4</sup> <http://magic.defra.gov.uk/>

<sup>5</sup> <http://www.landis.org.uk/index.cfm>

<sup>6</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

## Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>11</sup> to help understand the impact of particular developments on protected species.

## Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)<sup>12</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)<sup>13</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

<sup>8</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>9</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>10</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>11</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>12</sup> <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

<sup>13</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.



Neighbourhood Plan

Our ref: 902832.12

November 4<sup>th</sup> 2025

Dear Local Plans Team,

**Clifton upon Dunsmore Parish Neighbourhood Plan – Regulation 16 Consultation response**

Please accept this letter as a response on behalf of Richborough, who are in control of the land east of Rugby Road, Clifton upon Dunsmore.

**Plan Period**

The Neighbourhood Plan (NP) makes reference to the Plan covering the period to 2011 to 2041. The NP is not therefore in general conformity with the strategic policies contained in the development plan for the area (Rugby Borough Local Plan (RBLP) – June 2019) which covers the plan period 2011 to 2031. Further, it is not consistent with the plan period for the emerging Local Plan (2024-2045). No rationale is given as to the approach taken to having a different Plan period, and no policies or allocations are included to meet identified development requirements beyond 2031. The NP therefore does not meet the basic conditions, and should either amend the Plan period to 2031 or be explicit in confirming that the NP does not address development requirements beyond 2031.

**Policy ENV7**

The policy states that development which would have an adverse impact on the identified important views will not be supported. This wording goes beyond the requirements of Policy EN2 of the RBLP which requires development to avoid 'significant adverse visual impacts'. It is also not consistent with the wording of other NP policies, such as ENV2, ENV3, ENV4, ENV8, ENV10, E1, BE4, BE5, and BE6.

The NP is not therefore in general conformity with the strategic policies contained in the RBLP. No rationale is given as to the approach, and the NP therefore does not meet the basic conditions. Policy EN7 should therefore be amended to insert the word 'significant' prior to 'adverse impact'.

Further, objection is raised to Viewpoint 9. Policy ENV7 states these views are important to the setting and character of the village. The evidence base to support Viewpoint 9 (Appendix 5) consists of two photographs. There is no commentary to explain why these views are important. Further, it does not explain where these photos are taken from. The lower photo would appear to be taken in a cropped field which would not be within the public open space. There is an existing treed hedgerow along the southern boundary of the public open space which would filter views from the public open space during summer months. Further, there is nothing special or unique in respect of this view that warrants protection. It is requested that Viewpoint 9 is removed from the list.

Thank you for your time, and please notify me of the of the Local Planning Authority's decision under Regulation 19 in relation to the Neighbourhood Plan.

Yours sincerely

[Redacted signature block]



Internal: Development Strategy

[Redacted]  
Our ref

[Redacted]

Date

23 October 2025

### Regulation 16 consultation response: Clifton upon Dunsmore Neighbourhood Plan

We are fully supportive of Clifton upon Dunsmore Parish Council producing a neighbourhood plan for the parish and have had multiple discussions throughout the production of the draft document.

The parish includes the largest urban extension site with the borough, now known as Houlton but allocated under the name Rugby Radio Station in the adopted local plan. Houlton benefits from outline planning consent for up to 6,200 dwellings and a mix of other land uses, which was granted in 2014 (11/0699). Approximately 1000 new homes have already been built on this site, alongside facilities including a primary school (with a second under construction), a secondary school, and a small supermarket.

Throughout discussions on the emerging neighbourhood plan, it has been understood by officers that the principal reason for including the whole parish area (i.e. including Houlton) was to explore and seek to enhance connectivity between the village of Clifton upon Dunsmore and the new development. This is very much a supported aspiration.

The focus of this representation is whether it is appropriate for some of the policies included in the Submission Neighbourhood Plan to be applied to Houlton in light of the existing strategic allocation, outline planning approval, agreed design codes for the area, and ongoing delivery. It is our strong recommendation, that some of the draft policies should explicitly exclude Houlton, where there may be conflict with ongoing delivery of this strategic site, as highlighted below. This is relevant to achieving the basic condition of achieving general conformity with the strategic policies of the local plan.

#### Policy G1 – settlement boundaries

In relation to Houlton, the settlement boundary is based on the masterplan for the site.

The proposed settlement boundary around Clifton upon Dunsmore village, is slightly enlarged from that in the adopted local plan. As referenced within the Submitted neighbourhood plan

[Redacted]

however, a new local plan for the borough is in preparation. A Regulation 18 (Preferred Option) consultation was undertaken March -May 2025, and a Regulation 19 consultation is anticipated in early 2026.

The Preferred Option consultation included three draft allocations for housing at the village of Clifton upon Dunsmore, which together could deliver approximately 150 dwellings. Each of these would be adjacent to but outside the settlement boundary as drafted. Such is the interaction between policy documents that should some allocations be retained/included at Clifton upon Dunsmore Village at the point of adoption of the new local plan, this settlement boundary would be considered 'out of date'.

## **Policy G2**

We note that this policy specifically excludes Houlton, which is welcomed. Houlton has approved design codes to guide development.

The outline planning permission at Houlton requires development proposals to come forward in accordance with agreed design codes.

## **H1 – Housing Mix**

The Housing Needs Assessment included in the submission considers the housing need across the parish as whole, acknowledging the impact of Houlton. Houlton was originally allocated and outline permission subsequently granted as above, to contribute to the needs of the borough as a whole. We do not therefore consider it appropriate for very localized housing need to be applied across the strategic development at Houlton, which is how policy H1 could be interpreted as drafted.

We recommend that policy H1 should explicitly apply to development within the village of Clifton upon Dunsmore (and elsewhere in the parish as appropriate) and not to the development at Houlton.

## **H2 – Windfall sites**

No comments

## **H3 – Affordable housing**

This policy refers to exception sites only, and therefore would not apply to areas within the settlement boundaries defined in policy G1.

## **ENV1- Local Green Space**

No objections to ENV1.

## **ENV2 – Important Open Spaces**

No objections to ENV2.

## **ENV 3 – Sites and features of natural environment significance**

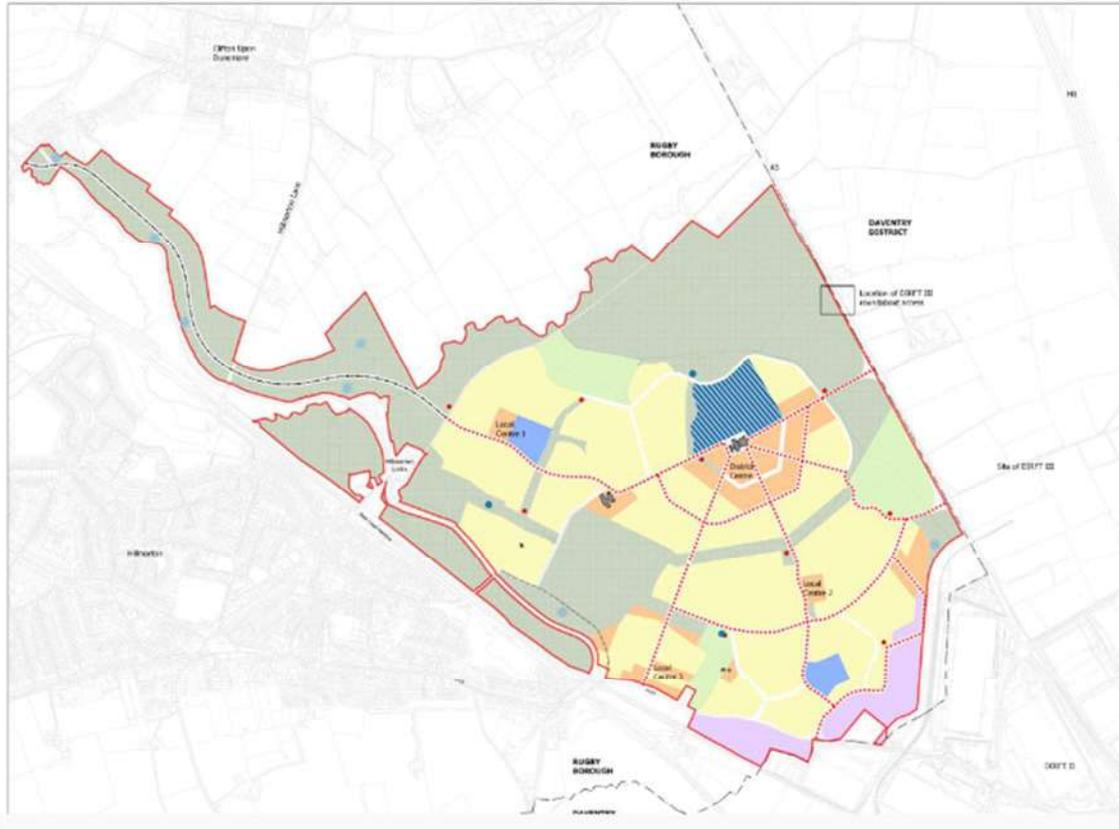
We are aware that Warwickshire County Council are intending to resurvey the Houlton area in respect of LWS designations. This data may therefore be subject to update. We note that the neighbourhood plan has already departed from the published LWS information.

## **EN4 – Biodiversity across the neighbourhood area**

We query the necessity of this policy as its content is addressed in existing national and local policy.

We query the definition of trees “*regarded as significant by the community*”, and how this could be applied in practice.

In applying part c of this policy, we have reservations about Figure 8, being broad in nature. When compared with the parameters plan (see below and attachment) for Houlton, areas shaded green cover development parcels. This could benefit from being more precise.

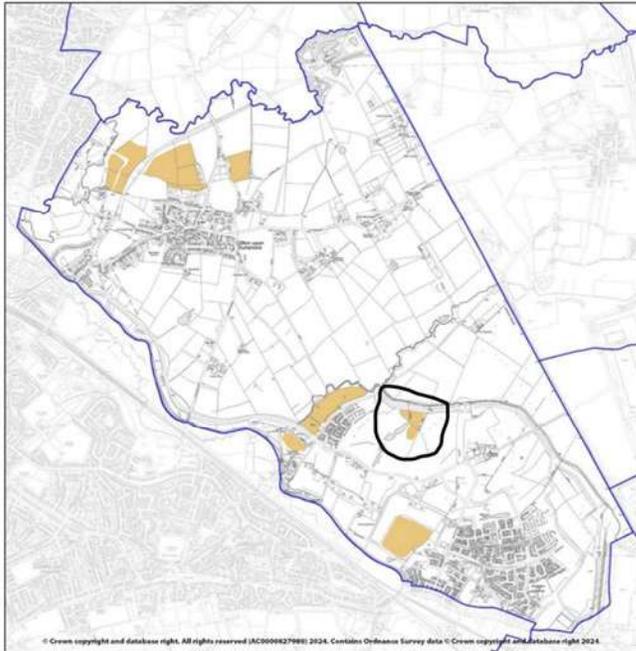


**ENV5 – sites of historical and environment significance**

No observations.

**ENV6 – Ridge and furrow**

We recognize the desirability to preserve ridge and furrow. Whilst the majority of areas identified in figure 10.3 (excerpt below) are outside development parcels in the parameter plan (above and attached), there is one area (highlighted below) which appears to form part of a development parcel in the outline approval. We are concerned this may cause confusion, or impact delivery on a strategic site should a new planning approval(s) be required in the future in this area.

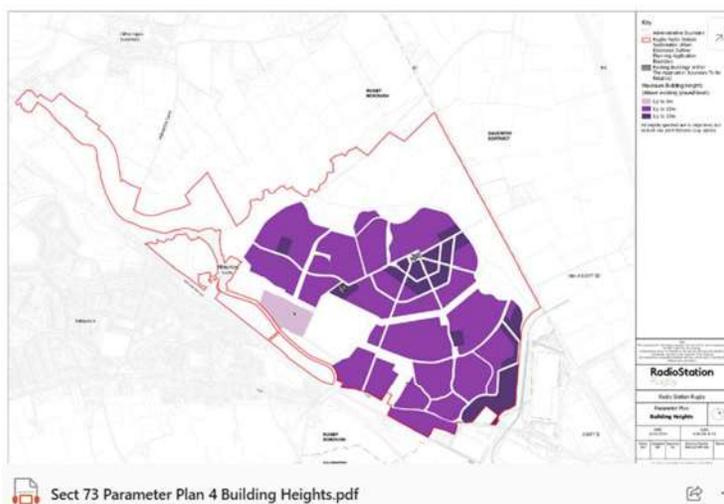


**ENV7 – Important views**

This policy appears to concentrate on (and refers specifically to) “the village”, which we assume to refer the village of Clifton upon Dunsmore.

We recognise why such a policy has been incorporated, however we question how ‘adverse impact’ on protected views could be assessed and applied in practice, given the changing nature of views even without development occurring in the immediate vicinity.

With specific regard to view 11, we note reference to the view over Houlton. This view is subject to ongoing change through development. The parameters plan identifies maximum building heights for development across the site.



**ENV8 – footpaths, bridleways and cycleways**

We note that this policy would apply across the entire parish, including Houlton, but have no concerns.

**ENV9 – Flood risk resilience and climate change**

No comments.

**ENV10 – Renewable Energy Generation and Infrastructure**

No comments.

**CF1 – The retention of community facilities and amenities**

No comments

**CF2 – New and improved community facilities**

Criterion (a) refers to meeting the requirements of GP2, which explicitly excludes Houlton.

We note that new facilities will come forward on Houlton in accordance with the outline permission and associated codes. We therefore query whether this adds unnecessary policy with the Houlton area.

**CF3 – The canal**

No comments

**E1 – schools**

This policy refers to the expansion of existing schools and could apply to the existing primary school at Houlton and those planned for the future.

**T1 – Traffic management**

We query reference to ‘rural highway network’ in this policy and what is meant by this? This might be alluding to an exclusion of Houlton, but this is not explicit. Further, criterion (a) refers to “traffic generation and movement through the **village**” (our emphasis). We request that the policy be more precise in what it is seeking to achieve.

The street network and parking requirements within Houlton are specified in agreed design codes, and we therefore request that these elements at Houlton are explicitly excluded from such a policy.

**T2- Off road parking spaces**

We request that development at Houlton is specifically excluded from this policy, in the same way as policy G2 explicitly excludes Houlton. The integration of parking is addressed in agreed design codes required as a condition of the planning consent, and these do include tandem parking.

As a minor comment, within criterion (a), local parking standards are set by Rugby Borough Council in planning policy – i.e. ‘Rugby Highways’ is an inaccurate reference.

**T3 – Electric Vehicles**

No comments.

**BE1 – Support for existing businesses and employment opportunities**

No comments

**BE2 – Support for new businesses and employment**

No comments

**BE3 – Shop fronts and signage**

No comments

**BE4 – Home working**

No comments

**BE5 – Tourism**

No comments

**BE6 – Farm Diversification**

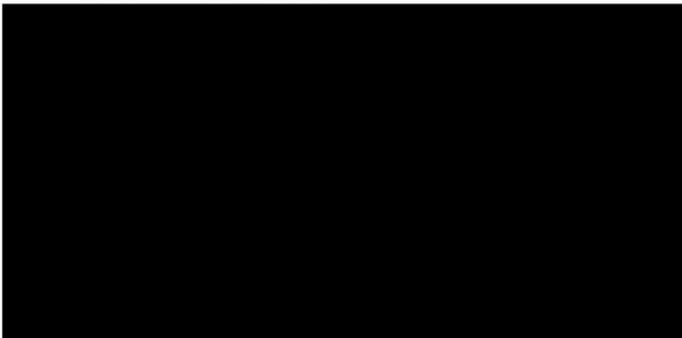
No comments

**C1 – Communications infrastructure**

No comments

We trust that the above is clear, but would be happy to expand as necessary.

Yours Faithfully







4<sup>th</sup> November 2025

## REPRESENTATIONS TO CLIFTON UPON DUNSMORE NEIGHBOURHOOD PLAN

### Introduction

Thank you for providing us with an opportunity to comment on your Submission Neighbourhood Plan (NP). We (Stoford Properties) are promoting a strategic site for employment development through Rugby's Local Plan, which falls in your neighbourhood plan area. Our site, known as Rugby East is located north of Houlton, with access off the A5. We are hoping that this site will be allocated for development in the next iteration of Rugby's Local Plan (Regulation 19) in Spring 2026.

Our proposals at Rugby East address many of the challenges referred to in your Submission NP, and support many of its aims also. Accordingly, we wanted to take this opportunity to introduce Rugby East and set out how the site, if allocated for development in Rugby's Local Plan, would assist in meeting some of the priorities and aspirations of the community of Clifton upon Dunsmore and the NP.

### 1. Rugby East

Rugby East is a major new landscape-led employment development outside the Green Belt, adjacent to Houlton, strategically located on the A5 and close to the M1 and DIRFT (Daventry International Rail Freight Terminal). The proposal is for an exemplary employment park that will:

- Deliver **135 hectares of strategic employment land** (with a potential first phase of 66 ha), supporting a mix of unit sizes for small, medium, and large businesses, including logistics and manufacturing.
- Create a **60-hectare Country Park**—an extensive green space connected to Houlton and Clifton upon Dunsmore, with walking/cycle trails, habitat creation, fitness and wellbeing areas, and a community orchard.
- Develop a **sustainable travel hub** with integrated public transport, cycle, e-scooter, and pedestrian links, and direct sustainable access to the approved Rugby Parkway Station.
- Implement **A5 highway improvements** (including a new roundabout) to improve access and safety from Lilbourne Road and manage HGV routing to avoid residential areas.
- Provide financial contributions towards a strategic, long term solution to **Gibbet Hill**.
- Significantly strengthen the business case to secure funding to deliver **Rugby Parkway Station** and enhance connectivity for the local community.
- Lead in **green energy and sustainability**, with high quality buildings designed for net zero carbon operation, extensive use of photovoltaic panels, green roofs, and low-carbon construction materials.

**The key benefits listed below demonstrate how Rugby East contributes to the achievement of sustainable development:**

**1. Economic Growth & Local Jobs**

- Providing “doorstep employment opportunities” for residents of Clifton upon Dunsmore, the growing Houlton community and wider Rugby area on non-Green Belt land with the creation of c.5,000 jobs.

**2. Sustainable Transport & Connectivity**

- Direct access to the A5 and improved Lilbourne Road / A5 junction for safer, more efficient travel.
- Integrated public transport, walking, and cycling routes, improving connectivity from Clifton upon Dunsmore to the new Rugby Parkway Station via Locks Lane.
- New sustainable travel hub with facilities for charging e-bikes/e-scooters.
- Substantial financial contributions towards a long-term solution to Gibbet Hill to improve capacity / ease congestion.

**3. Environmental & Community Benefits**

- 60 ha Country Park and enhancement of existing wildlife corridors, providing recreation for local residents.
- Walking and cycling paths that connect the communities of Clifton upon Dunsmore (via Rugby East) to Houlton and Rugby Parkway Station, and increase access to local services.
- Green infrastructure, tree planting, sustainable drainage, and improvements to biodiversity.
- Trim trail, health and wellbeing areas, outdoor gym, and community orchard for local residents.

**4. Climate Leadership**

- All base buildings are net zero carbon in operation, with the ability to expand PV coverage.
- Use of low-carbon materials and green roofs.
- Transparent, auditable approach to sustainability, aiming to set a high standard for future developments.

**In summary:** Rugby East is a transformative proposal for the Rugby Borough, combining economic opportunity, sustainable transport, environmental stewardship, and social inclusion. It is designed to be a “game changer” in both employment and sustainability for the region.

**Neighbourhood Plan comments**

The following comments relate to the NP vision and its draft policies:

**2. VISION**

We understand that it is important to the local community that Houlton, Rugby, and Clifton upon Dunsmore maintain their own identity and that an appropriate level of separation is maintained to avoid coalescence. Rugby East would extend the settlement of Houlton, however, owning to

the topography of the site which slopes down from Clifton upon Dunsmore, the site's design, (with building heights below the Clifton ridgeline and the inclusion of substantial landscape buffers) and the resultant distance between Rugby East and Clifton Upon Dunsmore village of c.700m, we consider that an appropriate level of separation between Rugby East/Houlton and Clifton upon Dunsmore would be maintained. The layout of the site has been informed by technical landscape evidence to ensure that vistas from Clifton upon Dunsmore are retained.

### **3. POLICY G2: BUILDING DESIGN**

We fully support the requirement for high quality development in respect of design, layout and use of materials. Rugby East proposes a low density, landscape-led development that includes high quality buildings, respects important viewports, retains biodiversity rich habitat and creates a 60ha publicly accessible country park. Rugby East will also serve as a model for renewable energy integration and low carbon technologies, supporting the UK's transition to net zero and reducing the carbon footprint of commercial operations. A wide range of technologies will be deployed across the site to ensure energy efficiency and sustainability including EV charging points, PV roofs and a mobility hub powered by renewable energy and offering sustainable travel opportunities. Importantly, our proposals protect the old village of Clifton upon Dunsmore and will not adversely affect its character, given that views from the village are mitigated with landscape treatments, building layout and materials use.

### **4. POLICY ENV 2: IMPORTANT OPEN SPACES**

We recognise the importance of protecting open spaces around Clifton upon Dunsmore. Our proposals at Rugby East will add to and strengthen the natural and semi natural greenspace offering at Houlton located along the Clifton Brook. Our proposals are opening up land that is currently private to create a publicly accessible, 60ha linear country park alongside the Clifton Brook. This will enhance the permanent grass fields along the Clifton Brook and bolster the amount of open space in the Plan area.

### **5. POLICY ENV 4: BIODIVERSITY ACROSS THE NEIGHBOURHOOD AREA**

The development of Rugby East is guided by a strong commitment to ecological enhancement. The site will feature green corridors and buffer zones, including native hedgerows and tree planting, to support local wildlife and maintain ecological connectivity. Sustainable drainage systems (SuDS) such as ponds and swales will be integrated to manage water runoff while creating valuable wetland habitats. Landscaping will include pollinator-friendly features like wildflower meadows and ancillary green roofs, supporting biodiversity and improving air quality. The project will deliver biodiversity net gain through habitat creation and long-term ecological monitoring.

Figure 8 in the NP shows habitat connectivity along Clifton Brook, north of Houlton. As noted above, our proposals include substantial landscape buffers. The southern landscape buffer will safeguard the wildlife corridor along the Clifton Brook and strengthen habitat connectivity in this area.

### **6. POLICY ENV 5: SITES OF HISTORICAL ENVIRONMENT SIGNIFICANCE**

The NP recognises Dunsmore House on Lilbourne Road (Grade II listed) and the surviving pond and woodland on our site which forms part of Dunsmore Park/Garden. The design and layout of our site, informed by a heritage professional, has been carefully designed to protect these assets and designed into our landscape strategy.

## **7. POLICY ENV 7: IMPORTANT VIEWS**

Having regard to the important views shown on map figure 11, we are pleased to learn that our proposals at Rugby East will protect the views that are most important to the setting and character of the village. Our proposals have been carefully designed to account for short and long-distance views.

## **8. POLICY ENV 8: FOOTPATHS, BRIDLEWAYS AND CYCLEWAYS**

Hillmorton Lane (also known as Locks Lane) provides a public access walking/cycling route between Hillmorton Locks and the A5 via Houlton. This route is identified on the Ordnance Survey Map but is not reflected on Figure 12 in the NP, which illustrates existing footpaths and other walking routes from Warwickshire CC mapping. This route is largely free of traffic since vehicular rights extend along an eastern part of the path only and serve only one private residence.

This footpath offers a traffic free route linking Houlton to Hillmorton and Rugby to the west, and Houlton to Lilbourne to the east. Therefore, it offers an important strategic walking link for the local community which should be reflected on Figure 12 in the NP.

Urban and Civic have recently upgraded a section of Hillmorton Lane / Lock Lane (north of the Redrow housing site) in conjunction with its Houlton development to encourage its use with upgrades including new surfacing, drainage, lighting, seating and green infrastructure. We are proposing to upgrade the eastern section of Hillmorton Lane / Locks Lane in a similar way to Urban and Civic, which will connect to the upgraded section of the route further encourage walking and cycling around the parish.

Rugby East will also feature an extensive network of new footpaths / cycleways covering more than 5km offering circular walks and running/cycling routes without the use of busy roads. The running/cycle tracks will be properly surfaced and lit by renewable sources, with 'bike repair kit' stations. Our proposals include a new, direct footpath / cycleway link to Hillmorton Lane / Locks Lane. With this, Rugby East will be within a 20-minute walk and 7-minute cycle ride of Houlton, and 13-minute cycle of Hillmorton.

We are also proposing an integrated footpath / cycleway that links Rugby East to Lilbourne Road to the north, providing walking and cycling opportunities to Clifton-upon-Dunsmore. This will facilitate a safe, non-driving link between Clifton on Dunsmore, Houlton and Rugby Parkway station which does not currently exist.

We can also explore the potential for further footpath / cycleway connectivity to Clifton upon Dunsmore from the northwestern part of the site which would shorten the distance between the village and Houlton.

We note that the NP states that "there are no opportunities for circular walks anywhere without the use of busy roads, and there are no safe non-driving links between Clifton and Houlton. With modern recognition of the value of walking and cycling for health and wellbeing and for the environment and the drive to carbon-neutrality generally, the lack is unfortunate and any adverse effects on the network's extent and character from new development will be very strongly resisted." Rugby East will provide pathways and cycleways for circular walks and provide a

sustainable link between Clifton upon Dunsmore and Houlton that can be explored and enjoyed by all.

## **9. POLICY CF2: NEW OR IMPROVED COMMUNITY FACILITIES**

We understand that importance of community facilities and the need for these to be enhanced to meet the growing needs of the parish. It is for this reason that our proposals at Rugby East seek to improve the quality and range of community facilities with the creation of new country park, outdoor gym, community orchard – providing an opportunity for the local community to pick seasonal fruits and a school kitchen garden – offering a secure, onsite area for local school's to support children with outdoor learning. This will inform lessons in biology/geography/food and nutrition and help to foster community relationships. We will also launch a Rugby East App for public download, which will include information relating to the Community Orchard (what to pick and when); running and cycling groups; fitness clubs (how to book/use the outdoor gym); and bus timetables / mobility hub data.

## **10. RUGBY PARKWAY STATION**

We are pleased to read that Rugby Parkway is considered to be a good and popular move with the local community providing better access to the rail network. We agree that it will be important for the station to become a transport interchange to access bus services in and out of Rugby and into DIRFT and Junction 18 businesses to provide an alternative to the use of cars. Rugby East is proposing an onsite travel hub for bus services, bikes and scooters in connection with the Parkway Station.

## **11. POLICY T1: TRAFFIC MANAGEMENT**

We support the requirement for major development proposals to demonstrate that their traffic generation and parking impacts will not result in severe direct or cumulative impacts on congestion or road and pedestrian safety.

Rugby East is proposing that the current access junction connecting Clifton-upon-Dunsmore, via Lilbourne Road, with the A5 be downgraded, so that whilst remaining an option, vehicular traffic will be encouraged from Clifton-upon-Dunsmore, to join the A5 via routing into Rugby East. This will provide a safer connection to the A5 via the new roundabout proposed to serve Rugby East. The new junction will be designed to prevent commercial traffic routing through the village.

The scheme provides direct access onto the A5 and therefore the routing of HGVs can be managed and avoid travelling via residential areas to access and leave the site.

Rugby East will increase vehicular movements through Gibbet Hill. Our conversations with Warwickshire County Council have confirmed that Gibbet Hill is an A5 priority project for National Highways who are currently modelling 3 options for its improvement to progress the business case in early 2026. With the RIS3 funding decision and Spring Spending Review approaching, this is a pivotal opportunity to show that Rugby is ready for investment. The allocation of Rugby East in the Regulation 19 Local Plan would further add to the case for a more significant long-term solution to Gibbet Hill and give Westminster the assurance that public investment can be matched by private sector commitment. The phased delivery of Rugby East can assist in ensuring floorspace is commensurate with programmed highway improvements.

Crucially, our site can provide the transport and infrastructure required to help effectively move people between their place of work and where they live sustainably and safely, which will address

the issue identified at paragraph 6.89 of the NP, that the “existing village of Clifton upon Dunsmore and the new Houlton development are primarily dormitory's serving the external businesses and major distribution hubs outside of the Parish”.

12. Please can you keep Stoford Properties notified of the Local Planning Authority's decision under Regulation 19 in relation to the Neighbourhood Plan.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 September 2025 16:16  
**To:** Local Plan  
**Subject:** RE: Public Consultation - Clifton upon Dunsmore Neighbourhood Plan

Good afternoon

Stratford-on-Avon District Council have no comments to make on the Plan.

Kind regards,

[REDACTED]

[REDACTED]

---

**From:** Local Plan  
**Sent:** 23 September 2025 12:01  
**To:** Local Plan  
**Subject:** Public Consultation - Clifton upon Dunsmore Neighbourhood Plan

**WARNING:** This email originated from outside of Stratford-on-Avon District Council.  
**THINK TWICE:** Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear consultee

### **Neighbourhood Planning Regulations (General) 2012 (as amended)**

#### **Regulation 16 consultation on the Clifton upon Dunsmore Neighbourhood Plan**

A neighbourhood plan has been prepared by Clifton upon Dunsmore Parish Council in consultation with the local community. Following a public consultation run by the Parish Council earlier this year (in accordance with the Neighbourhood Planning Regulations), the Clifton upon Dunsmore Neighbourhood Plan has been submitted to Rugby Borough Council as the Local Planning Authority. In accordance with Regulation 16 of the Neighbourhood Planning Regulations (General) 2012 (as amended), the submitted Clifton upon Dunsmore Neighbourhood Plan is now subject to a period of public consultation.

Copies of the consultation documents, including the Submission Version of the Clifton upon Dunsmore Neighbourhood Plan are available [here](#).

Alternatively, hard copies of the documents are available to view in the following locations within normal opening hours:

- Rugby Borough Council's offices, Town Hall, Evreux Way, Rugby, CV12 2RR
- Rugby Library and Information Centre, Little Elborow Street, Rugby, CV21 3BZ

Consultation responses can be sent via:

- 1) email to [REDACTED] with 'Clifton upon Dunsmore Neighbourhood Plan' in the subject line, or
- 2) by post to:



Please note, if you submit a response by email you do not need to submit a paper copy as well. Consultation responses will be made available for public inspection.

Any representation to the consultation may include a request to be notified of the local planning authority's decision under regulation 19 in relation to the neighbourhood development plan.

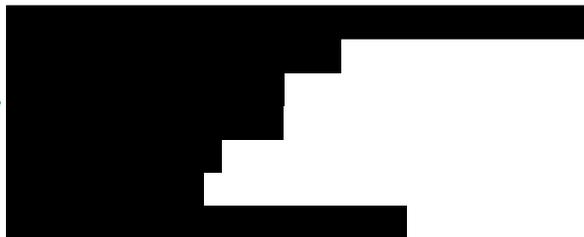
You have received this email because your contact details are held on our consultation database, or you have previously been consulted regarding the Clifton upon Dunsmore Neighbourhood Plan (as set out in the submitted Consultation Statement). If you wish to have your details removed from our database, please contact us.

To view the council's privacy notice please visit:



Should you require any further information, please contact the Development Strategy team.

Regards,



---

This email has been scanned by the Symantec Email Security.cloud service.

---



3 November 2025

Dear Sir / Madam,

Our Ref –  
RRS007/AM/HA

**RE: CLIFTON UPON DUNSMORE NEIGHBOURHOOD PLAN –  
REGULATION 16 CONSULTATION**

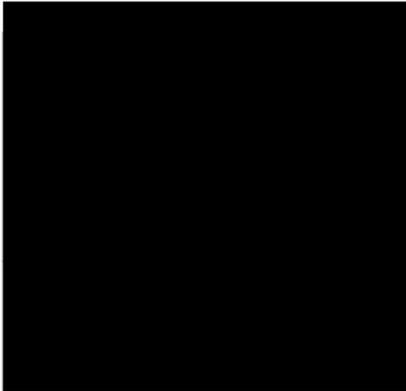
On behalf of our client, SUE GP LLP, we are pleased to enclose these representations in response to the above consultation on the draft Clifton upon Dunsmore Neighbourhood Plan (NP).

SUE GP LLP are Master Developers of Houlton which falls within the NP boundary. Houlton benefits from an outline planning permission (OPP) (ref: R17/0022) for up to 6,200 homes, commercial and employment floorspace and a wide mix of complementary land uses and green infrastructure.

Numerous reserved matters and detailed applications have been approved for, and significant progress made on, the implementation of the development. The new community now hosts new homes, Houlton School (6FE Secondary School), St Gabriels Primary School, Dollman Farm Local Centre including restaurants, offices and community facilities, and a vast network of pedestrian and cycling routes through extensive areas of open space and wildlife corridors.

The following representations are made in this context, to ensure that the emerging NP supports the continued delivery of Houlton.

A number of misaligned boundaries have been identified in the plans embedded within the NP policies, which are inconsistent with the existing, approved and/or implemented features on-site. Therefore, **Appendix A** to this letter includes a series of Plans which provide





more accurate information, in .pdf and .dwg formats (as relevant). The discrepancies are explained further in our representations below.

It should be noted here that SUE GP LLP have had no prior engagement with the Parish Council in preparing the NP, and as far as we are aware, have not been contacted by the NP group to discuss its contents. Given Houlton represents more than half of the NP area and is the most significant positive driver for change in the locality, we would have expected SUE GP LLP to have been invited to contribute to the NP process. Aligning with, and recognising, SUE GP LLP's aspirations for the scheme should therefore be critical in informing the NP. SUE GP LLP is a key stakeholder and should have been integral to the NP's engagement and drafting process. We would welcome opportunities for further engagement in updating the NP, prior to it proceeding to Referendum.

### **Representations**

Overall, SUE GP LLP objects to the draft NP policies as currently drafted and particularly around the following key themes:

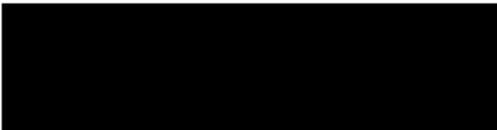
- Settlement Boundary and other Policy Duplication
- Green Infrastructure and Open Spaces
- Historical Environment
- Policies' Application to Houlton

### ***Settlement Boundary and other Policy Duplication***

Policy G1 defines two separate Settlement Boundaries for the existing Clifton upon Dunsmore village and for Houlton, to reinforce the physical and visual separation between the two neighbourhood areas. Houlton's Boundary is drawn tightly around the indicative development extent depicted on the Illustrative Masterplan, thereby defining anything beyond this Boundary as 'countryside'. The only permissible uses in the countryside would be agriculture, affordable housing (through rural exception sites) or formal recreational sports use.

It is critical to note the Illustrative Masterplan has no planning approval status through the Local Plan or the OPP, so should not be relied upon for any development boundaries. Further, NP policies should not duplicate national or local policies – the emerging Rugby Local Plan Review already defines Settlement Boundaries for Houlton and for Clifton-upon-Dunsmore under emerging policy S1, and this should therefore not be repeated in the draft NP. Representations submitted by SUE GP LLP under the Local Plan Review's Preferred Options consultation in May 2025 have already sought to align the Settlement Boundary with the approved Houlton OPP Site boundary.

In a similar vein, flood risk is tackled at national and local policy levels so there is limited need or justification for the inclusion of Policy ENV9 (Flood Risk Resilience and Climate Change) in the draft NP. The adopted Local Plan also addresses the protection and enhancement of public rights of way, notwithstanding off-site improvements secured by the Houlton s106 Agreement, so there is limited additional benefit to be gained from the inclusion of Policy ENV8 (Footpaths, Bridleways and Cycleways). Areas of ridge and furrow within the Houlton SUE have already been subject to planning consideration, and areas to be retained/removed have been secured



by the extant OPP through the approval of the site-wide Heritage Management Plan. At this advanced stage, Policy ENV6 would yield no effective outcomes and, if included in the draft NP, should only relate to those areas of ridge and furrow outside of Houlton. Concerns around the duplication of open space protection are also raised under 'Policy ENV2' and 'Policy ENV3' below.

### ***Green Infrastructure and Open Spaces***

#### *Policy ENV1 – Local Green Spaces*

Policy ENV1 designates parts of the Key Phase 1 Combined LEAP/NEAP and Formal Open Space (which the NP names "Houlton Park") as a Local Green Space within which development would only be permitted in very special circumstances. No further guidance is provided within the draft policy or supporting text as to what these 'very special circumstances' would entail, nor is any justification provided within the evidence base as to the rationale for this boundary or this designation. In order to avoid overlaps with other policy designations, we consider that **Plan 01** of Appendix A should be used as the boundary for "Houlton Park". Further clarification should also be added to the draft NP as to what these 'very special circumstances' may entail.

#### *Policy ENV2 – Important Open Spaces*

Policy ENV2 designates Houlton Park and a few additional sites as Important Open Spaces for their recreational or amenity value. This includes areas of flood risk management, Local Wildlife Sites (LWS), Wildlife Corridors, Formal Open Spaces, areas of Houlton School and amenity landscaping across the Houlton SUE. Each of these open space typologies serves a different function and purpose, and will therefore be subject to different design specifications and levels of access / maintenance.

While it is appreciated that Policy ENV2 seeks to protect these from harm or loss, no evidentiary reasoning is provided for designating these spaces, nor to clarify or differentiate between the open space typologies identified in the key to Figure 6.2 or the policies that would apply to them. Further, the undefined and sometimes inaccurate extents of these spaces would prohibit development in areas which benefit from OPP. To that end, we consider there is very limited justification for the inclusion of this draft policy and its designations, especially in the context of Policy ENV1 which already designates some of the open spaces for protection and of emerging Local Plan policies which designates Local Wildlife Sites, Wildlife Corridors and other Open Spaces for protection.

Should the policy remain, the boundaries would need to align with the open spaces shown in the Open Space plan (**Plan 02** of Appendix A) which was submitted for the Local Plan Review's Preferred Options consultation, and which illustrates the extent of implemented open spaces.

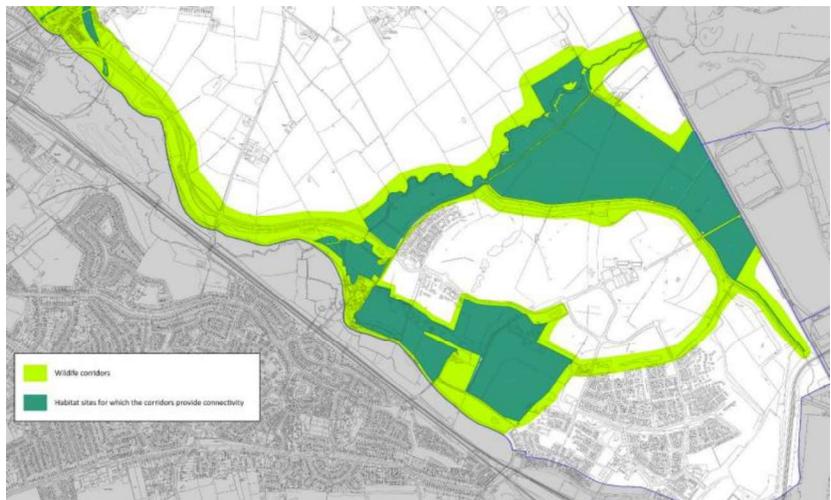
#### *Policy ENV3 – Sites and Features of Natural Environment Significance*

Policy ENV3 identifies several LWS across Houlton which, outside of the A5 Meadows, are all inconsistent with the latest boundaries drawn by the Natural Capital Assessment Partnership. These LWSs are currently under review to inform the emerging Local Plan Review. Further, a parcel of land in the southern extent of Houlton is identified as a Traditional Orchard which

does not align with the extent of Orchards identified for retention under the Houlton OPP, and Key Phase 1 Regulatory Plan. Since LWS and the Orchard are addressed by adopted and emerging Local Plan policies, we consider this draft NP policy adds another layer of confusion and inconsistency, and should be omitted from the final NP.

*Policy ENV4 – Biodiversity across the Neighbourhood Area*

Clause C of Policy ENV4 does not support development which would adversely affect habitat connectivity provided by the wildlife corridors (plan extract below). This policy is too restrictive, particularly since the wildlife corridors and their affected areas are drawn so broad-brush and without reference to the Houlton Wildlife Corridors (extract from draft NP below) which have very clearly defined boundaries, as approved via the relevant reserved matters applications. These should be amended to align with the approved and implemented extents shown on **Plan 03** of Appendix A. Further, it should be recognised that Houlton’s OPP precedes the statutory 10% BNG requirement, so this target cannot be applied to reserved matters to be submitted pursuant to that extant outline permission.

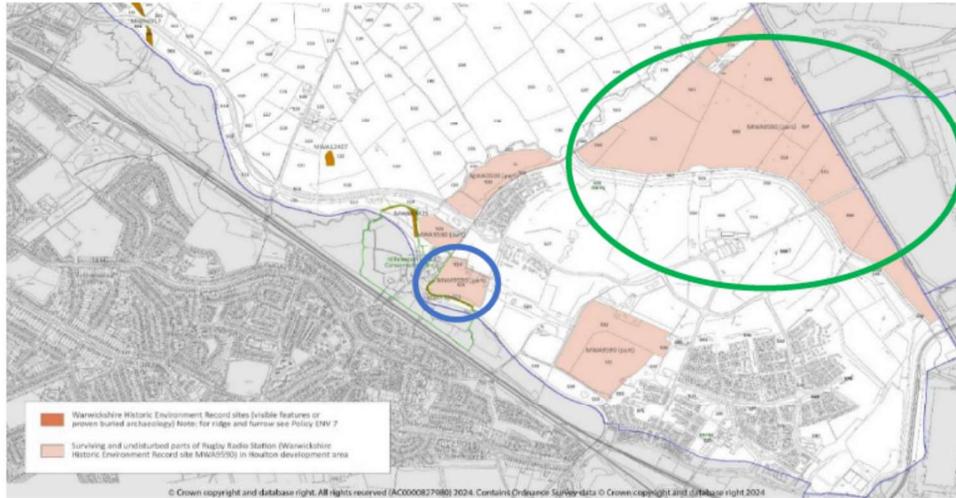


**Historical Environment**

Policy ENV5 identifies sites of at least 'local' significance for their historical features, including Normandy Farm but also undeveloped greenfield area within the western, northern and eastern parts of Houlton which are extant, have visible expression, or have proven buried archaeology (extract below identifies these as "surviving and undisturbed parts of Rugby Radio Station").

Although some former mast bases are to be retained in the north of Houlton as secured through approval of the site-wide Heritage Management Plan, beyond these, no heritage assessment undertaken to date has attached any significance and/or consequence to those "surviving and undisturbed areas" identified in green in the extract below. Further, as mentioned, areas of ridge and furrow to be retained/removed (including the type of suitable development in those areas) has been subject to planning determination and, in the case of the area circled in blue, has already been secured under the approved KP3 Regulatory Plan. No satisfactory evidence underpins the draft NP's proposed spatial designation, and therefore we consider this policy should be omitted since the important heritage sites are extensively captured by Warwickshire

County Council's Historic Environment Record (HER) and Houlton's on-site surveys – both of which have been relied on to identify sites for protection under the adopted and emerging local policies and do not need to be duplicated here.



### ***Policies' Application to Houlton***

It is unclear throughout the draft NP which policies apply (or don't) to development within Houlton. Paragraph 3.10 appears to exempt Houlton from Policies G2 and H1-H3 in relation to Building Design and Housing respectively, since Houlton is subject to its own approved parameters and tiered Design Guides. However, in this example, only Policy G2 explicitly confirms its provisions do not apply to Houlton within the draft policy wording, whereas Policies H1-H3 make no such commitments. This should be clarified throughout, both in relation to the housing policies and to wider NP policies such as off-road parking spaces (T2) and New Employment (BE2).

Further, as identified above, many of the draft NP policies either duplicate or are fundamentally inconsistent with local policies (adopted and emerging) which would create a challenging policy landscape for any future planning applications, not just at Houlton, especially where critical environmental designations (e.g. LWS) are drawn without reference to the respective local equivalent evidence base. The draft NP should be simplified to identify only the local priorities and vision for future development, taking into account the views of key stakeholders in the neighbourhood area, including those of SUE GP LLP, while deferring judgements on the spatial designations to the local planning authority – RBC, in this case.

It would also be very helpful if the following minor corrections could be incorporated into the NP amendments:

- Para 6.29 – SUE GP LLP are the Master Developers, but are not a "Development Corporation"
- Para 6.39 – updated intake figures (post-2022) should be used for Houlton School, and reference should be added to this school's expansion into a Through School through the recently-permitted provision of primary education facilities (R25/0075)

- 
- Para 6.44 – the Old Station Nursery at Dollman Farm should be referred to as a nursery, not a playgroup

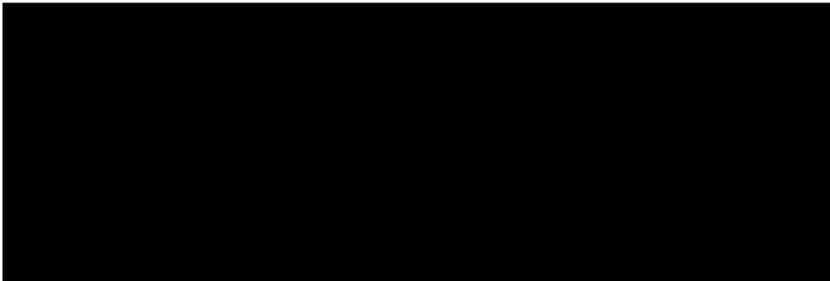
**This Submission**

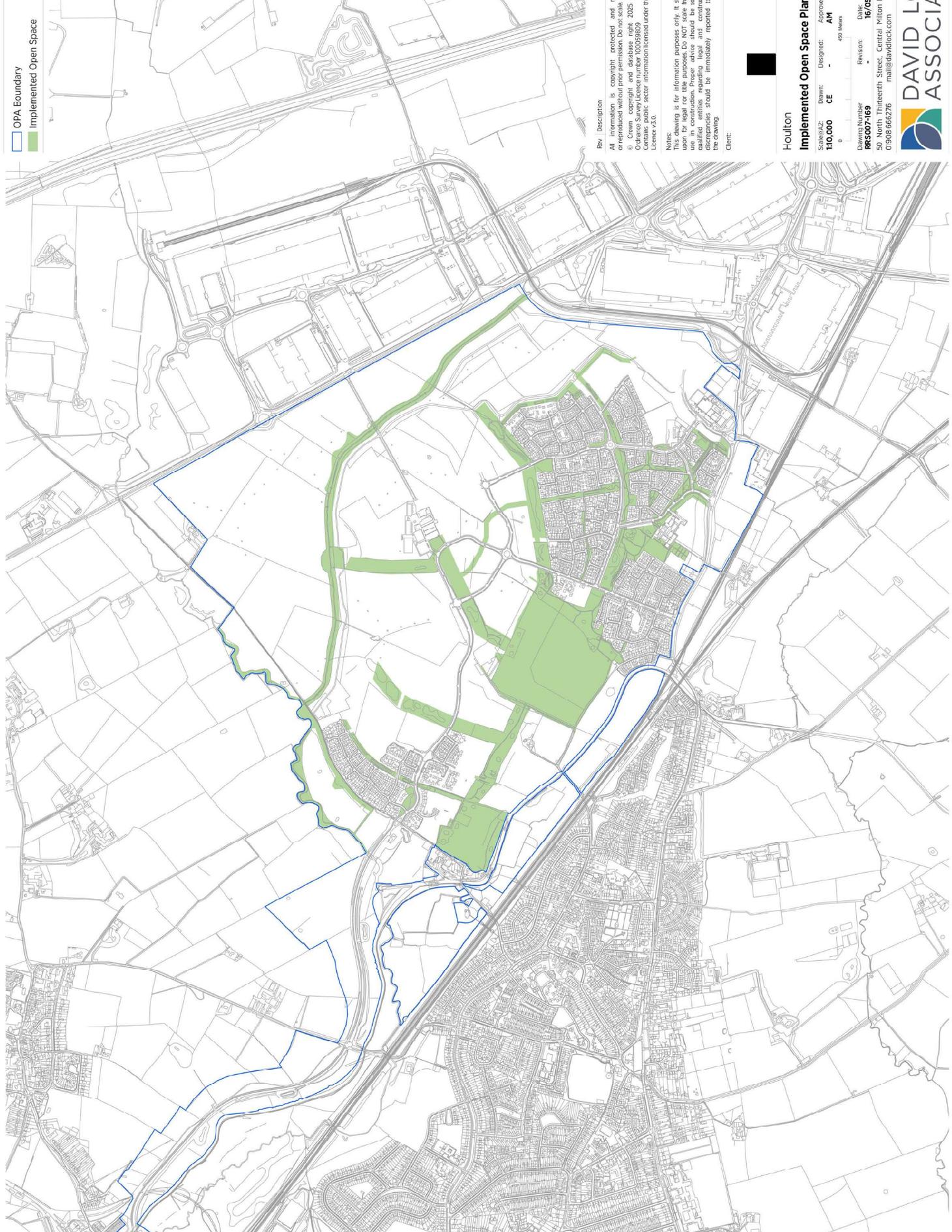
This letter accompanies and should be read alongside the following plans in **Appendix A:**

#	Policies Map Layer	Plan Reference	Format
01	Houlton Park	RRS007-178	PDF + DWG
02	Implemented Open Space	RRS007-169	PDF + DWG
03	Approved Wildlife Corridors	RRS007-179	PDF + DWG

We trust the above is helpful to inform the updating of the draft Neighbourhood Plan prior to its Referendum, and we would welcome opportunities for further engagement with yourselves as required to progress these. In the meantime, should you require any further information, please do not hesitate to contact me or my colleague Helen Armes ([harmes@davidlock.com](mailto:harmes@ davidlock.com)).

Yours faithfully,





OPA Boundary  
 Implemented Open Space

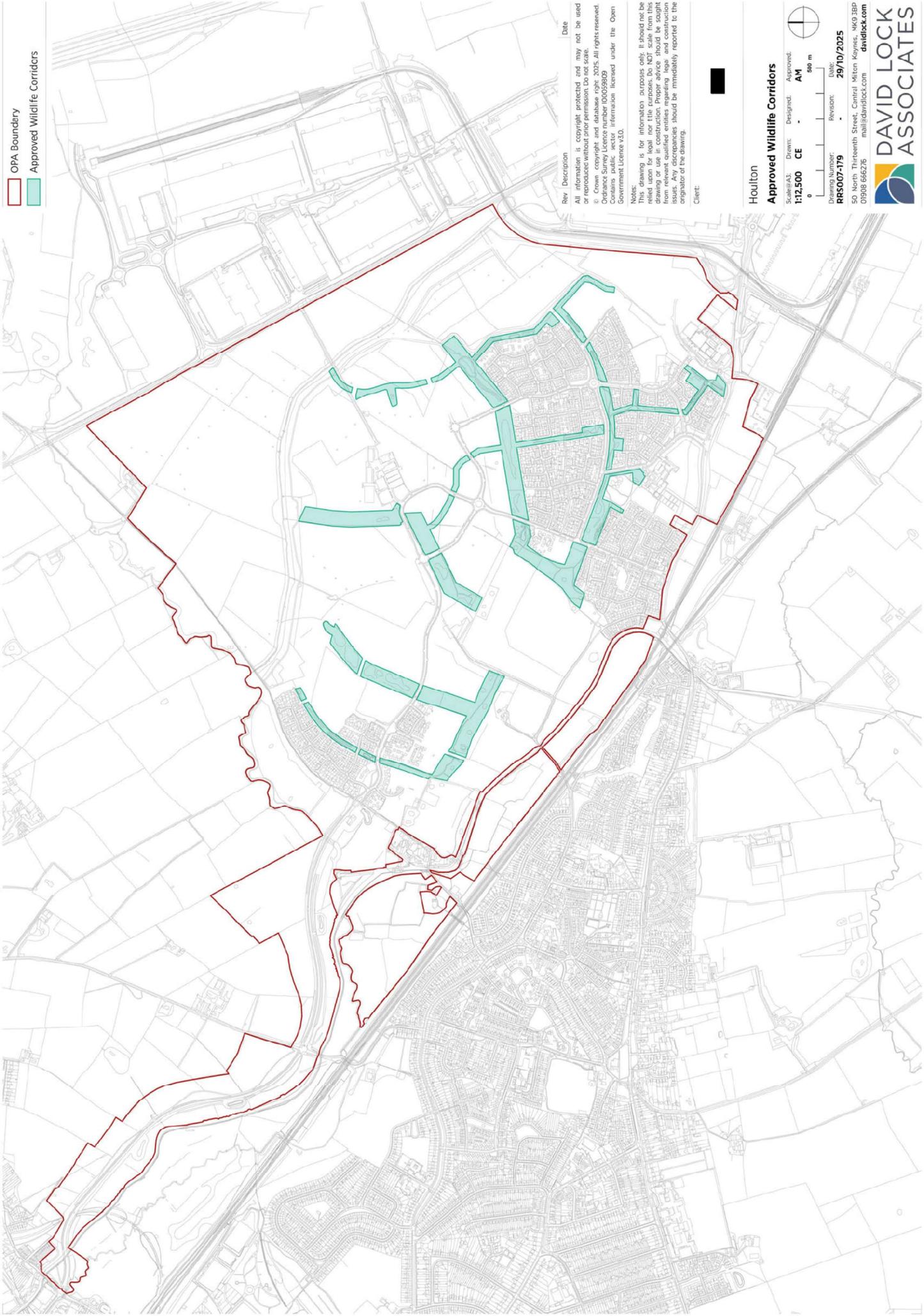
Rev. Description Date  
 All information is copyright protected and may not be used or reproduced without prior permission from the scale.  
 © Crown copyright and database right 2025. All rights reserved.  
 Ordnance Survey Licence number 100059809  
 Contains public sector information licensed under the Open Government Licence v3.0.

Notes:  
 This drawing is for information purposes only, it should not be relied upon for any legal or financial decisions. It is not intended for use in construction. Proper advice should be sought from relevant qualified entities regarding legal and construction issues. Any discrepancies should be immediately reported to the originator of the drawing.  
 Client:



**Houlton**  
**Implemented Open Space Plan**  
 Scale: 1:10,000  
 Drawn: CE  
 Designed: -  
 Approved: AM  
 Date: 16/05/2025  
 Drawing Number: RR007-169  
 Revision: -  
 Drawing Date: 16/05/2025  
 50 North Thirteenth Street, Central Milton Keynes, MK9 3SP  
 01908 666276  
 mail@davidlock.com  
 davidlock.com





OPA Boundary  
Approved Wildlife Corridors

Rev	Description	Date
	All information is copyright protected and may not be used or reproduced without prior permission. Do not scale, copy, or create derivative works without the express written consent of the copyright owner. © 2025. All rights reserved. Contains public sector information licensed under the Open Government License v3.0.	

Notes:  
This drawing is for information purposes only. It should not be relied upon for legal or title purposes. Do NOT scale from this drawing or use in construction. Proper advice should be sought for any issues. Any discrepancies should be immediately reported to the originator of the drawing.

Client:

Houlton  
**Approved Wildlife Corridors**

Scale: AS  
1:12,500  
0 500 m

Drawn: CE  
Designed: AM  
Approved: AM

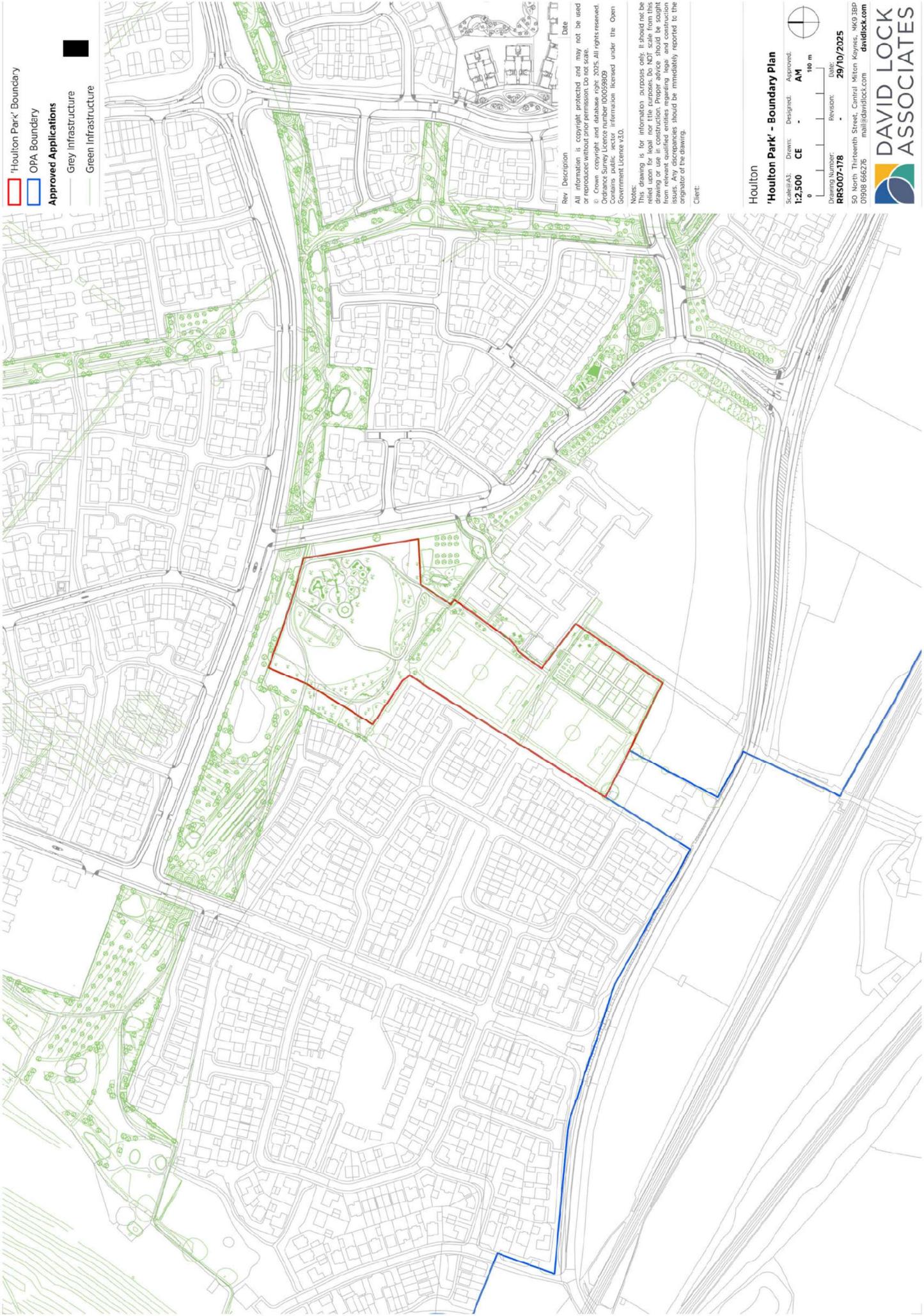
Drawing Number: RR5007-179  
Revision: 29/10/2025

Date: 29/10/2025

50 North Thirteenth Street, Central Milton Keynes, MK9 3BP  
01908 666276  
mail@davidlock.com  
davidlock.com

**DAVID LOCK ASSOCIATES**

- 'Houlton Park' Boundary
- OPA Boundary
- Approved Applications**
- Grey Infrastructure
- Green Infrastructure



Rev	Description	Date

All information is copyright protected and may not be used or reproduced without prior permission. Do not scale. © Crown copyright and database right 2025. All rights reserved. Contains public sector information licensed under the Open Government Licence v3.0.

**Notes:**  
 This drawing is for information purposes only. It should not be relied upon for legal nor title purposes. Do NOT scale from this drawing or use in construction. Proper advice should be sought from a qualified professional before any construction or other issues. Any discrepancies should be immediately reported to the originator of the drawing.

Client:

**Houlton**  
**'Houlton Park' - Boundary Plan**

Scale: A3  
 Drawn: **CE**    Designed: **AM**    Approved:

12,500  
 0    100 m

Drawing Number: **RRS007-178**    Revision:    Date: **29/10/2025**

50 North Thirteenth Street, Central Milton Keynes, MK9 3BP  
 01908 666276    mail@davidlock.com    davidlock.com

**DAVID LOCK ASSOCIATES**

## Tabulated Warwickshire County Council Flood Risk Management Comments on the Clifton upon Dunsmore Neighbourhood Development Plan to 2011-2041

WCC FRM has the following content related comments:

Page	Paragraph No.	Commencing:	Comment
15	A Vision for 2041	3.5	<p>You could add to your objective a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield sites.</p> <p>WCC FRM support the protection of open spaces and river corridors.</p>
17	An Environmental Role	3.18	<p>You could add to your objective a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield sites.</p> <p>WCC FRM support the protection of open spaces and river corridors – this could be developed to mention the benefits of open space as flood risk management to retain water. Above ground SuDS could be utilised in open spaces.</p>
21	Building Design Principles		<p>You could add to your objective a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield sites.</p> <p>If a site is over 1ha or for the development of 10 dwellings or more, it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site-specific Flood Risk Assessment and Surface Water Drainage Strategy must be submitted to the Lead Local Flood Authority for review.</p> <p>All developments will be expected to include sustainable drainage systems. It would also be good to mention that all above ground attenuation features should be designed to be multifunctional and consider the four pillars of SuDS which are water quality, water quantity, amenity and biodiversity.</p> <p>You could develop this point to include the SuDS hierarchy. The hierarchy is a list of preferred drainage options that the LLFA refer to when reviewing planning applications. The preferred options are (in order of preference): infiltration (water into the ground), discharging into an existing water body and discharging into a</p>

Page	Paragraph	Comment
23	Housing Need 4.2.2	<p>surface water sewer. Connecting to a combined sewer system is not suitable and not favourable.</p> <p>It is stated that there is a requirement to provide at least 12,400 new dwellings between 2011 and 2031 across the Borough. If a site is over 1ha or for the development of 10 dwellings or more, it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site-specific Flood Risk Assessment and Surface Water Drainage Strategy must be submitted to the Lead Local Flood Authority for review.</p>
32	Local Green Spaces	<p>WCC FRM support the protection of open spaces and river corridors.</p>
51	Flood Risk Resilience and climate change	<p>You could add to your objective a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield sites.</p> <p>If a site is over 1ha or for the development of 10 dwellings or more, it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site-specific Flood Risk Assessment and Surface Water Drainage Strategy must be submitted to the Lead Local Flood Authority for review.</p> <p>All developments will be expected to include sustainable drainage systems. It would also be good to mention that all above ground attenuation features should be designed to be multifunctional and consider the four pillars of SuDS which are water quality, water quantity, amenity and biodiversity.</p> <p>You could develop this point to include the SuDS hierarchy. The hierarchy is a list of preferred drainage options that the LLFA refer to when reviewing planning applications. The preferred options are (in order of preference): infiltration (water into the ground), discharging into an existing water body and discharging into a surface water sewer. Connecting to a combined sewer system is not suitable and not favourable.</p> <p>You could include an additional point that encourages new developments to open up any existing culverts on a site providing more open space/green infrastructure for greater amenity and biodiversity; and the creation of new culverts should be kept to a minimum. New culverts will need consent from the LLFA and should be kept to the minimum length.</p> <p>The NDP includes a flood map in figure 13. The EA updated the National Flood Risk Mapping in March 2025</p>

Page	Paragraph	Comment
		<p>and the LLFA would therefore recommend checking the updated mapping to determine whether the existing mapping is still fit for purpose. Please find a link below</p> <p><a href="#">Get flood risk information for planning in England - Flood map for planning - GOV.UK</a></p> <p>You may wish to reference the WCC Local Guidance for Developers which sets out the WCC requirements when planning applications are submitted from a Flood Risk and Surface Water perspective. Please find a link below</p> <p><a href="#">WCCC-453486374-170</a></p> <p>If any works are undertaken that impact the flow of an ordinary watercourse or within the channel profile of an ordinary watercourse, Land Drainage Consent should be sought from the LLFA. Please find a link below</p> <p><a href="#">Ordinary watercourse land drainage consents - Warwickshire County Council</a></p>