fisher german

# Land East of Rugby Road, Clifton-upon-Dunsmore

## Mineral Resource Assessment

Richborough

19 November 2025

fisher german

## Professional memberships and accreditations

fisher german

# Contents

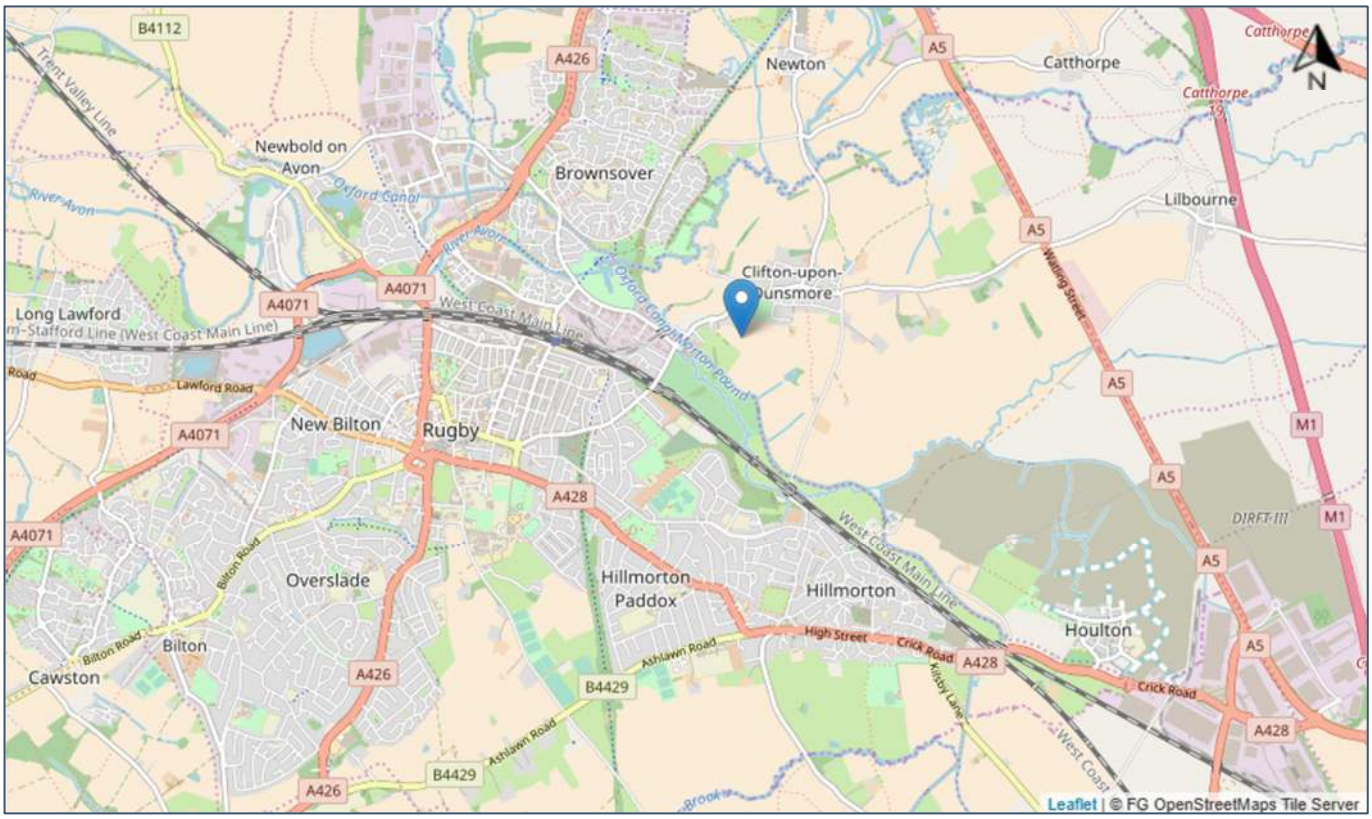
# 1 Introduction

## 1.1 Background

1.1.1 This report has been prepared by the Minerals Department of Fisher German LLP following instructions from Richborough (the Client) to produce a desk-top based Mineral Resource Assessment (MRA) for Land East of Rugby Road, Clifton-upon-Dunsmore, Warwickshire, CV23 0DF (the 'site').

1.1.2 The indicative site centre location is shown in **Figure 1**. A Site Location Plan is included within **Appendix 1**.

*Figure 1: Indicative site centre location*




## 1.2 Proposed Development

1.2.1 A Sketch Layout plan (included in **Appendix 1**) provides an overview of the residential land use proposal with vehicular access provided off Rugby Road.

1.2.2 An Outline Planning application has been submitted by Richborough to Rugby Borough Council (planning reference R25/0565) with the proposal description detailed as follows:

1.2.3 Outline application with some matters reserved for the demolition of all buildings and the residential development of up to 160 dwellings, and creation of associated vehicular access off Rugby Road, pedestrian/cycle access points, parking, landscaping, drainage features, open space, childrens play area and associated infrastructure (all matters reserved except for vehicular access off Rugby Road).

1.2.4 The planning application status is listed as 'Consultation Carried Out' at the time of writing.

## 1.3 Assessment Aims

1.3.1 The aim of this Minerals Assessment is to consider the possible impacts the proposed development may have on potential mineral resources beneath the site and in proximity to it.

1.3.2 This report has been prepared in cognisance of the following guidance documents:

- Mineral Safeguarding in England: Good Practice advice, British Geological Survey – Minerals and Waste Programme, Open Report OR/11/046, 2011.
- Mineral Safeguarding Practice Guidance: The Mineral Products Association and The Planning Officers' Society, April 2019 V1.4.

## 1.4 Site Description

1.4.1 The site description and location details are summarised in **Table 1**.

*Table 1: Site description*

| Detail | Comment |
|---|---|
| Approximate site area | 9.65 hectares. |
| National Grid reference (OS GB) | E: 452653, N: 275970 (Approximate centre). |
| Site location | The site is located approximately 400 m southwest of the village of Clifton upon Dunsmore and approximately 2.25 km northeast of Rugby town centre. Access to site is via Rugby Road in the northwest. |
| Current land use and description | The site comprises undeveloped agricultural land surrounded by mature hedgerows with isolated mature trees. Access if off Rugby Road in the northwest with a vehicle track along the southern site boundary. On-site adjacent the south western site boundary is an vacant agricultural barn. Overhead electrical cables appear to bisect the site within the west orientated approximately southeast to northwest and a second set within the north orientated approximately northeast to southwest. |
| Surrounding land use | Immediate surrounding land use comprises residential properties to the northwest, Clifton Village Football Pitch to the north, residential properties to the northeast, and agricultural land to the east and south. |
| Sensitive land uses | The site is within a Site of Special Scientific Interest (SSSI) Impact Risk Zone associated with Cave's Inn Pits SSSI located approximately 3.4 km off-site to the north. The Impact Risk Zone is applicable to proposed development including Infrastructure (aviation) and Air Pollution (livestock, poultry, slurry lagoons and manure stores).<br><br>The Oxford Canal is located approximately 185 m off-site to the southwest orientated approximately southeast to northwest. Approximately 300m off-site and beyond the Oxford Canal is Clifton Brook. An unnamed pond is located approximately 35 m off-site to the southeast<br><br>No other sensitive land uses have been identified within or in close proximity to the site. |
| Site topography | The site slopes down from the northeast (approximately 118 m Above Ordnance Datum (AOD)) to the southwest (approximately 98 m AOD) due to the localised valley of the Clifton Brook. |

## 1.5 Confidentiality Statement

1.5.1 This report is addressed to and may be relied upon by Richborough. It may not be relied upon or transferred to any other parties without the express written agreement of Fisher German. No responsibility will be accepted where this report is used, either in its entirety or in part, by any other party.

# 2 Mineral Planning

## 2.1 National Planning Policy

2.1.1 The National Planning Policy Framework (NPPF) sets out a framework for facilitating the sustainable use of minerals, including their safeguarding. Relevant extracts of the NPPF are detailed below[1]:

2.1.2 Paragraph 223:

c) safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked);

2.1.3 Paragraph 226:

Minerals planning authorities should plan for a steady and adequate supply of aggregates by:

f) maintaining landbanks of at least 7 years for sand and gravel and at least 10 years for crushed rock, whilst ensuring that the capacity of operations to supply a wide range of materials is not compromised.

2.1.4 Paragraph 227:

Minerals planning authorities should plan for a steady and adequate supply of industrial minerals by:

c) maintaining a stock of permitted reserves to support the level of actual and proposed investment required for new or existing plant, and the maintenance and improvement of existing plant and equipment. These reserves should be at least 10 years for individual silica sand sites; at least 15 years for cement primary (chalk and limestone) and secondary (clay and shale) materials to maintain an existing plant, and for silica sand sites where significant new capital is required; and at least 25 years for brick clay, and for cement primary and secondary materials to support a new kiln.

## 2.2 Local Planning Policy

2.2.1 Warwickshire County Council is the Mineral Planning Authority for the site.

2.2.2 The current Minerals Local Plan (MLP) was adopted in July 2022 and runs to 2032. "The Warwickshire Minerals Local Plan forms part of the Development Plan for the county alongside the adopted Waste Core Strategy and the Local Plans for the borough and districts in Warwickshire and also adopted Neighbourhood Plans. It will be used to make decisions on mineral planning applications for mineral extraction, processing and restoration and resources to help boroughs and districts to ensure that minerals resources and mineral infrastructure are not sterilised by non-mineral development."[2]

2.2.3 The site is identified within the Warwickshire MLP as being within a Mineral Safeguarding Area (MSA) designated for 'Unconsolidated Sand and Gravel' (see Appendix 2).

2.2.4 The most recent Local Aggregate Assessment for Warwickshire (published 2017) states at that time the landbank for sand and gravel was 13 years based on 2016 figures.

2.2.5 The latest West Midlands Aggregates Working Party Annual Report dated 2023 (2022 data) includes data for Warwickshire in relation to land won sand and gravel. A 10-year sales average is listed as 344,000 t and a 3-year sales average of 383,000 t. The County has permitted reserves of 4,008,000 t which equates to a landbank of 10.5 years based on the 3-year sales average. A landbank of 7 years is required to be maintained under national planning policy.

[1] Ministry of Housing Communities & Local Government, National Planning Policy Framework (NPPF), December 2024.
[2] https://www.warwickshire.gov.uk/mineralslocalplan

Mineral Safeguarding Areas

2.2.6 Mineral resources are finite materials and can only be worked where they exist naturally. Mineral planning authorities are required to define Mineral Safeguarding Areas in minerals plans so that resources are not sterilised by non-mineral development, although there is no presumption that the resources will be worked.

2.2.7 Under Policy MCS 5: Safeguarding of Minerals and Minerals Infrastructure of the Warwickshire MLP:

"Warwickshire's sand and gravel, crushed rock, brick-making clay resources, cement raw materials, shallow coal and building stone and existing mineral sites or existing and future mineral infrastructure will be safeguarded against needless sterilisation by non-minerals development."

"Non-mineral development, except for those types of development set out in Appendix 3, should not normally be permitted if it would needlessly sterilise mineral resources or would prejudice or jeopardise the use of existing and planned mineral sites or existing and future mineral infrastructure."

"Consistent with the 'agent of change' principle developers need to demonstrate that existing mineral sites and mineral infrastructure will not have unreasonable restrictions placed on their operation, because of new development. Where significant adverse effects on new development could occur then the applicant will be responsible for providing suitable mitigation."

2.2.8 Under Policy DM 10: Mineral Safeguarding of the Warwickshire MLP:

"Non-mineral development, except for those types of development set out in Appendix 3, should not normally be permitted if it would needlessly sterilise important mineral resources or would prejudice or jeopardise the use of existing mineral sites or existing and future mineral infrastructure unless:

a. the prospective developer has produced evidence prior to the determination of the planning application that clearly demonstrates that the mineral concerned is no longer of any value, or potential value or the minerals infrastructure is no longer needed; or

b. it would be inappropriate to extract mineral resources at that location, with regard to the other policies in the Plan: or

c. it can be clearly demonstrated that the mineral will be extracted prior to the development taking place; or

d. the non-mineral development is of a temporary nature and can be completed and the site restored before the mineral needs to be extracted; or

e. the merits of the development clearly outweigh the need for safeguarding including where extraction would make it economically unviable and/or undeliverable.

Proposals for the extraction of minerals prior to, or as part of, non-mineral development, will be supported where:

a. it is practicable and will not result in the approved non-mineral development being incapable of implementation and development; and

b. it is environmentally feasible; and

c. it can be carried out without any unacceptable adverse impacts; and

d. it can be carried out within a reasonable timescale: and

e. proposals are submitted which clearly demonstrate that the site will be restored should the approved non-mineral development be delayed or not implemented."

Mineral Planning Authority – Consultation 15 October 2025

2.2.9 A consultation response has been received from Warwickshire County Council (as Mineral Planning Authority) dated 15 October as part of the Outline Planning submission. The consultation response is included as Appendix 3.

2.2.10 The response objects to the proposals primarily on the basis that minerals have not been assessed in line with the MLP, and specifically policies MCS5 and DM10.

2.2.11 No objections are made on Waste Safeguarding grounds.

2.2.12 Planning applications for non-mineral development within a Mineral Safeguarding Areas should be accompanied by a Mineral Resource Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

# 3 Mineral Resource

## 3.1 Data Sources

3.1.1 Relevant information sources have been reviewed in assessing the anticipated ground conditions, and include:

- British Geological Survey (BGS) Geoindex Onshore data.
- BGS scanned historical exploratory hole records.
- BGS published geological map Sheet 184, Warwick, scale 1:50,000, Solid and Drift edition (1984).
- Institute of Geological Services, Industrial Minerals Assessment Unit (IMAU) Mineral Assessment Report 125, The Sand and Gravel Resources of the County between Coventry, Rugby, Warwickshire

## 3.2 Type of Mineral On site – Published BGS Mapping

3.2.1 A distinction is made between superficial deposits and bedrock. Superficial deposits, consisting of clays, silts, sands and gravels are the youngest geological deposits, found at or near to the surface. Bedrock deposits are older and are found beneath superficial deposits (where present).

3.2.2 The geological mapping indicates that the site and surrounding area are underlain by the following materials as described by the BGS:

Superficial Deposits

3.2.3 **Appendix 4** presents the 1:50,000 scale superficial deposits for the site and surrounding area.

3.2.4 The site and immediate surrounding area is recorded to be underlain by Dunsmore Gravel Member which is described by the BGS as 'Red, brown and yellow, commonly ochreous, matrix-supported flinty gravel with lenses of coarse sand. Most deposits are poorly sorted and clay-rich. Sand and gravel, clayey brown and yellow; Late Glacial to Postglacial.'

3.2.5 The southeast section of the site is mapped to be underlain by Till (a Mid-Pleistocene Diamicton, i.e. Glacial Till) and the Bosworth Clay Member.

Bedrock Geology

3.2.6 **Appendix 5** presents the 1:50,000 scale bedrock geology for the site and surrounding area.

3.2.7 The site and immediate surrounding area is underlain by the Charmouth Mudstone Formation. Charmouth Mudstone is described by the BGS as *'Dark grey laminated shales, and dark, pale and bluish grey mudstones; locally concretionary and tabular limestone beds; abundant argillaceous limestone, phosphatic or ironstone (sideritic mudstone) nodules in some areas; organic-rich paper shales at some levels; finely sandy beds in lower part in some areas.'* The Charmouth Mudstone Formation is part of the Lias Group.

## 3.3 Intrusive Mineral Resource Data

BGS historical exploratory hole records

3.3.1 There is a single historical exploratory hole record which sits on the site boundary within the northwest. A further two relevant historical exploratory hole records have been reviewed based on their proximity to the site and being formed within the Dunsmore Gravel Member, as outlined in **Table 2**. BGS historical logs are included as **Appendix 6**.

3.3.2 Materials interpreted by Fisher German as Dunsmore Gravel Member have been colour coded orange to assist with review of the data.

*Table 2: Historical BGS exploratory hole log summary*

| Borehole ID (Distance and approximate direction from site) | Relevance to site | Geological Strata Summary (m bgl[3]) | Groundwater Observations |
|---|---|---|---|
| SP57NW202 (On the site boundary within the northwest) | Within Dunsmore Gravel Member | 0.0 to 1.2: Gravel, red-brown, poorly sorted. Loamy sand with abundant flint and bunter-type pebbles. Some dark ferruginous patches. Becoming clayey downwards (Dunsmore Gravel) | No observations made on the log |
| | | 1.2 to 2.1: Clay, grey to fawn, with red sandy streaks becoming reddish-brown and gritty downwards with small pebbles of chalk, flint, and specks of coal, and green Keuper siltstone and red mudstone | |
| | | 2.1 to 13.8*: Clay, grey with some brownish mottles, dying out downwards, stiff and crumbly with abundant pebbles of chalk and less abundant flint, limestone, rare bunter, red Keuper mudstone and sandstone. Becoming more silty from c. 9.7 m. | |
| SP57NW700 (405 m southeast) | Within Dunsmore Gravel Member | 0.0 to 0.3: Light brown sand with stones | Water strikes at: 6 m, 22 m, 41 m, 45.9 m & 72 m |
| | | 0.3 to 6.0: Brown sandy clay with some gravel | |
| | | 6.0 to 6.9: Brown claybound sand with stones | |
| | | 6.9 to 16:0: Firm grey clay with small stones | |
| | | 16.0 to 25.0: Firm to hard grey clay with mudstone pieces | |
| | | 25.0 to 32.7: Firm grey clay with hard clay pieces | |
| | | 32.7 to 71.0: Hard grey clay with mudstone bands | |
| | | 71.0 to 81.6*: Hard grey clay with mudstone bands and occasional stones | |
| SP57NW94 (390 m northeast) | Within Dunsmore Gravel Member | 0.0 to 6.1: Dug well, loamy sand (Dunsmore Gravel) | No observations made on the log |
| | | 6.1 to 9.5: Blue marl (Chalky boulder clay) | |
| | | 9.5 to 49.1: Interbedded sands and clays (Wolston 'clay') | |
| | | 49.1 to 64.3*: Blue Lias (Lower Lias) | |

* Maximum depth of exploratory hole

3.3.3 Based on the historical records obtained, materials interpreted as Dunsmore Gravel Member are shown to be a poorly sorted sand and gravel in a clay matrix. 'Loamy' is an old term for a sand which typically has enough clay and silt content to have slight cohesion and retain moisture. Dunsmore Gravel Member ranges from 2.1 to 6.1 m in thickness and is underlain by Till, Bosworth Clay Member with Blue Lias at depth.

IMAU Mineral Assessment Report 125

3.3.4 Industrial Minerals Assessment Unit Mineral Assessment Report 125 (*The sand and gravel resource of the country between Coventry and Rugby, Warwickshire*) includes an assessment of the Dunsmore Gravel Member resource block which spans from west of Stretton-on-Dunsmore to Clifton upon Dunsmore.

*3.3.5* The Dunsmore Gravel is described as a fluvioglacial deposit which was formed by ice retreat and subsequent meltwaters which created an outwash plain. Dunsmore Gravel is described as *'usually a clayey to very clayey pebbly sand although where the deposit is thicker, a basal clayey sandy gravel may be present. The deposit contains much flint and ironstone in addition to Bunter material derived from the Sherwood Sandstone Group. The high ironstone content gives these sands and gravels a distinctive ochreous colour and may in part explain the ironpans which are commonly found within a meter of the surface. '*

[3] Below ground level

3.3.6 The IMAU report states that Dunsmore Gravel have a mean grading of 16% fines, 57% sand and 27% gravel. The fines are described as having an ochreous colour and are often silty.

Site Specific Ground Investigation

3.3.7 As noted above, a single historical borehole log is available on the site boundary within the northwest. No other site-specific ground investigation information is available at the time of writing.

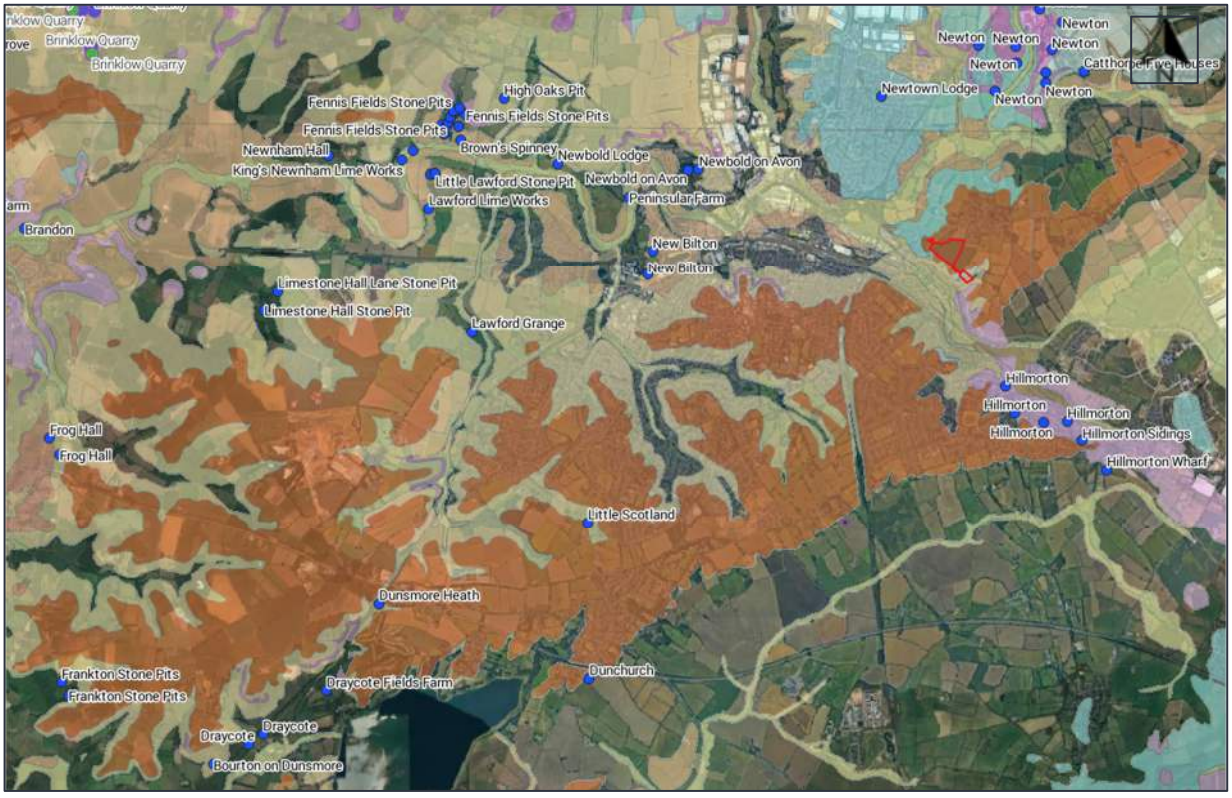
## 3.4 Historical Quarries

3.4.1 Review of Ordnance Survey historical mapping does not indicate any historical mineral workings on-site or in the surrounding area.

3.4.2 Review of legacy quarry database records indicates a single historical quarry within a 1.5 km search radius which relates to 'Hillmorton' which is listed as extracting from 'Hillmorton Sand'.

3.4.3 Figure 2 shows the distribution of historical quarry records in relation to the site and the Dunsmore Gravel Member (orange). This highlights that the Dunsmore Gravel Member has generally not been targeted for mineral working historically with sand and gravel workings in the local area principally targeting River Terrace Deposits and Glaciofluvial Sheet Deposits which are known to have a lower fines content.

*Figure 2: Historical quarry database search*




## 3.5 Mineral Quality

Superficial Deposits

3.5.1 The quality of superficial deposits is dictated by the material size. The lower the content of clay, silt and fine sand, the higher the quality of the deposit.

3.5.2 Based on geological maps, BGS descriptions, historical borehole logs and IMAU data, Dunsmore Gravel Member is unlikely to represent a commercially viable sand and gravel resource.

3.5.3 A maximum fines content of 10 to 12% is typical for determining economic viability, noting that washing and processing becomes too intensive to process in excess of this. IMAU data suggests the Dunsmore Gravel Member has a mean fines content of 16%.

3.5.4 The ochreous colour of the resource makes it less desirable for building sand and similarly the high ironstone gravel content means the resource is unlikely to be suitable for concreting due to reactivity, instability and discolouration.

3.5.5 Furthermore, based on the legacy quarry database records, the Dunsmore Gravel Member does not appear to have been targeted for mineral extraction in the local area.

3.5.6 Till and the Bosworth Clay Member which are mapped in the southeast corner of the site are not typically sought for commercial mineral extraction.

Bedrock Geology

3.5.7 It is unlikely that the underlying Charmouth Mudstone Formation would be targeted for brick clay manufacture, noting that modern day brick clay reserves tend to be located next to existing plants and allocated reserves.

3.5.8 Similarly, it is considered unlikely that the underlying Charmouth Mudstone Formation would be utilised as a cement raw material, noting that cement raw material quarries tend to cover a large spatial area, and extensions to existing sites are preferred in proximity to cement plants.

3.5.9 It is noted that the bedrock geology underlying the site is not attributed to a Mineral Safeguarding Area.

3.5.10 Constraints to the potential extraction of the resource are detailed in Section 4.1.

## 3.6 Estimated Tonnage of Resource

3.6.1 In accordance with the PERC Reporting Standard (Pan European Reserves and Resources Reporting Committee, 2021) this assessment is classed as an Inferred Mineral Resource.

3.6.2 An Inferred Mineral Resource is that part of a Mineral Resource for which quantity and grade or quality are estimated based on limited geological evidence and sampling. Geological evidence is sufficient to imply but not verify geological and grade or quality continuity.

3.6.3 As the depth of Dunsmore Gravel Member has not been verified across the entire site, the estimated tonnage of the resource cannot be stated. However, the Dunsmore Gravel Member is not typically targeted for mineral extraction due to high fines, colour and ironstone content (as outlined in Section 3.3).

## 3.7 Estimated Economic Value of Mineral

3.7.1 Due to the mineral classification being an Inferred Mineral Resource, the quantity of minerals cannot be accurately calculated, and the economic value should not be stated.

3.7.2 Constraints to the potential extraction of the resource are detailed in Section 4.1.

# 4 Potential Constraints and Opportunities on Mineral Extraction

## 4.1 Constraints to Mineral Extraction

4.1.1 The site is mapped as being underlain by the Dunsmore Gravel Member, which is recorded on historical BGS borehole logs as a poorly sorted sand and gravel in a clay matrix ranging from 2.1 to 6.1 m thick. IMAU Report 125 assesses the Dunsmore Gravel Member resource block south of Rugby as having a mean fines content of 16% which does not represent a commercially viable sand and gravel resource quality. The Dunsmore Gravel Member also has an ochreous colour and high ironstone gravel content which further restricts its potential applications in concreting and building sand. Historically the Dunsmore Gravel Member does not appear to have been widely targeted for mineral extraction in the local area.

4.1.2 Based on the above factors, the site is not deemed viable for commercial scale mineral extraction either as a standalone quarry or for prior extraction.

4.1.3 Stand-off distances & environmental impact

4.1.4 A 100 m stand-off to residential properties from active mineral workings is commonly applied by mineral operators during mineral planning applications predominantly due to noise and visual impacts of quarrying but also due to dust and vibration. This is typical for quarrying of as-dug ballast and associated aggregate processing. A 100 m standoff would typically be coupled with an approximate 4 to 5 m high bund to break line of sight ground level plant and screen taller static plant and stockpiles. A bund also has the benefit of providing mitigation for noise and dust. Should a reduced standoff to residential properties be considered (i.e. 50 to 100 m) a higher bund (6 to 8 m) would ordinarily be required. 100 m stand-offs to residential property are more common place in the mineral industry as there are likely to be less complaints from residents and environmental issues which would impact operations and carry reputational risk for operators.

4.1.5 It is noted that sand and gravel mineral allocations within the Warwickshire Mineral Local Plan include the requirement for a minimum stand-off of 100 m from residential properties to minimise potential adverse impacts from such things as noise and dust.

4.1.6 While it has already been concluded that the Dunsmore Gravel Member is not suitable for commercial mineral extraction, the presence of residential properties off-site in the northwest and northeast would reduce the workable area of the site by approximately 40%. This would further restrict the commercial viability of the site for mineral working.

## 4.2 Opportunities for Mineral Extraction

4.2.1 The underlying Dunsmore Gravel Member may be limited to use as fill and landscaping due to high fines, colour and ironstone gravel content. Excavated materials should be retained on-site for re-use wherever possible to reduce off-site disposal.

# 5 Conclusions and Recommendations

5.1.1 The site is being considered for non-mineral development with a proposed residential development.

5.1.2 The site falls within a sand and gravel Mineral Safeguarding Area identified by Warwickshire County Council and is recorded to be underlain by the Dunsmore Gravel Member.

5.1.3 Review of BGS historical borehole logs and BGS descriptions indicates the Dunsmore Gravel Member to consist of loamy / clay bound sand and gravel which is indicative of high fines content.

5.1.4 Industrial Minerals Assessment Unit (IMAU) Minerals Assessment Report 125 assesses the Dunsmore Gravel Member south of Rugby as having a mean fines content of 16%, having an ochreous colour and containing high ironstone gravel content.

5.1.5 Due to the above factors, the Dunsmore Gravel Member does not represent a commercially viable mineral resource, and this is evidenced by a lack of historical mineral workings in the deposit locally.

5.1.6 Overall, the site is not constrained by commercially viable mineral extraction potential, which supports its suitability for residential development.

## 5.2 Recommendation for Ground Investigation

5.2.1 A site-specific ground investigation is recommended as part of the Reserved Matters application to:

- Validate the conclusions of this desk-top study.
- Confirm the quality and extent of the Dunsmore Gravel Member beneath the site.

# Appendix 1: Drawings

| Revision | | Date | Drn | Ckd |
|---|---|---|---|---|
| A | Red line boundary revised to suit title boundary | 24.01.25 | RM | TM |
| B | Aerial image added | 09.04.25 | SL | RM |
| C | Scale amended | 10.06.25 | SL | RM |
| D | Red line boundary updated | 13.06.25 | SL | RM |
| E | Red line boundary updated | 07.07.25 | SL | RM |


KEY

Site Boundary

Visual Scale 1:1250 @ A1

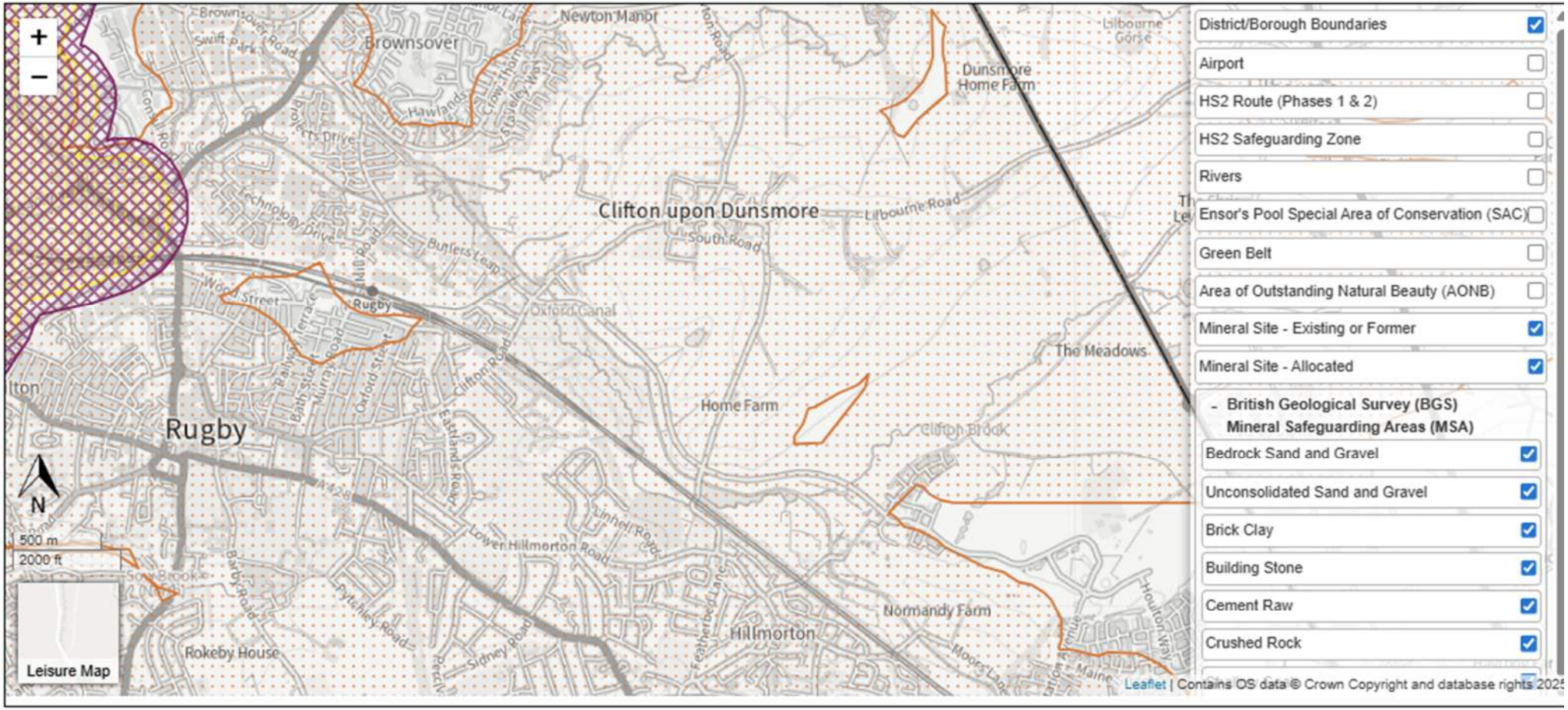
0 25m 50m 75m 100m

| | |
|---|---|
| status | Feasibility |
| notes | The copyright of this drawing belongs to Marrons Planning and should not be copied or reproduced without written consent. This drawing is for planning purposes only and is not to be used as a basis for construction. |
| project title | Land East of Rugby Road Clifton-upon-Dunsmore, Rugby |
| client | Richborough |
| drawing title | Location Plan |
| drawing no. | P10-001 |
| scale | 1:1250 |
| date | 14 Jan 2025 |
| drawn by | JC |
| checked by | RM |
| revision | E |

Marrons
No.1 Colmore Square, Birmingham, B4 6AA
t: 0121 214 0000 | w: www.marrons-planning.co.uk
e: info@marrons-planning.co.uk


Site Boundary
Existing Vegetation to be retained
Indicative Proposed Planting
Indicative Location for Play Area
Residential Development
Streets
Private Drives
Proposed Paths
Proposed SUDs
Public Open Space
Potential All Modes Access
Potential Pedestrian Access
Potential Sports Pitches
Drainage Outfall
DRAFT
Marrons

# Appendix 2: Mineral Safeguarding Area Plans




# Map legend

| | | |
|---|---|---|
| | | ***Policy Number:*** |
| Warwickshire District/Borough Boundary | - | N/A |
| Airport | - | DM8 |
| HS2 (Phase 1) Route and Safeguarding Zone | - | SO9 |
| River: Anker / Avon / Blythe / Cole / Tame | - | DM1 |
| *River links to the Severn and Humber Estuaries and migratory fish species* | | |
| Special Area of Conservation (S.A.C.): Ensor's Pool | - | DM1 |
| Green Belt | - | MCS4,11 |
| Area of Outstanding Natural Beauty (A.O.N.B.) | - | MCS3,7,9,11 and DM1 |
| ***Mineral Site:*** | | |
| Existing and Former | - | N/A |
| Allocated | - | N/A |

British Geological Survey

## Mineral Safeguarding Area (M.S.A.):

- Bedrock Sand and Gravel
- Unconsolidated Sand and Gravel
- Brick Clay
- Building Stone
- Cement Raw Material
- Crushed Rock
- Shallow Coal

***Policy Number:*** MCS5 and DM10

**NOTE:** Based upon B.G.S. mineral resources data, with permission of the British Geological Survey. The mineral safeguarding information is designed to be used at 1:50,000 or higher. It is indicative only.

fisher german

# Appendix 3: WCC Consultation & Objection

BY EMAIL ONLY

Lucy Davison
Development Team
Rugby Borough Council
Town Hall
Evreux Way
Rugby
CV21 2RR

Paul Wilcox
Principal Planning Policy Officer
Strategic Planning & Regeneration
Infrastructure, Planning, Environment
Communities
Warwickshire County Council
Warwick
CV34 4SX

Tel: 01926 412538
Email: paulwilcox@warwickshire.gov.uk
Web: www.warwickshire.gov.uk

Your Ref: R25/0565

Date: 15th October 2025

Dear Ms Davison

**Development:** Outline application with some matters reserved for the demolition of all buildings and the residential development of up to 160 dwellings, and creation of associated vehicular access off Rugby Road, pedestrian/cycle access points, parking, landscaping, drainage features, open space, children's play area and associated infrastructure (all matters reserved except for vehicular access off Rugby Road).

**Location**: Land Southeast Of, Rugby Road, Clifton Upon Dunsmore.

I refer to your email letter dated 1st September 2025 consulting the County Planning Authority (CPA) on the minerals and waste implications of the above-mentioned planning application. This application has been assessed against policies MCS5 and DM10 in the adopted minerals local plan and policy CS8 in the adopted waste plan.

The CPA notes that the Planning Statement does not acknowledge that the site lies within a Mineral Safeguarding Area and the description of the development plan does not include the adopted mineral and waste local plans. It also notes that the site is not proposed for allocation in the Rugby Borough Local Plan Preferred Option Consultation Document – March 2025.

**Minerals and Waste**

The site falls within a Mineral Safeguarding Area/Mineral Consultation Area for sand and gravel so policies MC5 and DM10 in the adopted Warwickshire Minerals Local Plan 2018 - 2032 apply. Paragraphs 222, 223 (d-e) and 225 in the NPPF (December 2024) are also relevant and are material considerations. The proposed development of the site does not benefit from an Exemption set out in Appendix 3 in the adopted Minerals Local Plan to which policies MCS5 and DM10 relate.

Working for Warwickshire

The purpose of policies MCS5 and DM10 is to protect economically viable mineral. resource deposits from needless and unnecessary sterilisation, in line with Chapter 17 of the National Planning Policy Framework.

The policy also seeks to maximise the recovery of viable mineral resources prior to development. It also protects the important minerals infrastructure in the county required to maintain the supply of valuable mineral products to the market including existing and allocated sites and existing associated facilities.

The planning application does not acknowledge the presence of the MSA and therefore does not address the mineral resource implications of developing the site. It is a significant issue and needs to be addressed before this application is determined. As the planning policy approach is to ensure that mineral resources are not needlessly sterilised by non-mineral development, it is important that the nature and extent of the resource and the impact upon it is assessed.

Based on this assessment judgements can then be made on whether all or part of the resource should be allowed to be sterilised or all or part removed prior to or as part of the non-mineral development. The release of any mineral resources could contribute to the costs of developing the site and could offer materials for subsequent use in the project.

The potential for prior extraction should therefore be assessed in the context of policies MCS5 and DM10 and paragraphs 9.185 - 9.187 of the adopted minerals local plan. Particular opportunities may lie in the recovery of mineral deposits uncovered during the preparation and construction phases of the project. The recovered mineral reused on site, would encourage a reduction in inbound materials for construction uses leading to reduced costs. In addition, export of the recovered mineral off site to a local mineral operator for further treatment has the potential for revenue.

In the absence of information and evidence demonstrating that the mineral resource implications of developing the site including by prior extraction have been addressed the County Planning Authority **OBJECTS** to this planning application. This objection can be overcome by the submission and approval by the CPA of a Mineral Assessment Report based on the guidance in paragraphs 9.177 - 9.180 and 9.185 – 9.187 in the adopted Minerals Local Plan.

There are no existing operational minerals or allocated minerals sites or minerals infrastructure sites within influencing distance of the application site.

**Materials**

It is not clear from the planning application how imported Materials are going to be dealt with. The construction phase(s) will involve the importation of a range of materials including primary aggregates.

As a major development, the CPA would expect to see details of the material requirements of the project including how and where they are going to be sourced and managed and to the impact on available Construction Materials (aggregates, construction products, steel, and timber).

The CPA believes that starting point for supplying some of the materials in the construction project should be to reuse extracted mineral resources on site wherever possible. This would reduce the need to import a range of construction materials including primary aggregates providing environmental and climate change benefits. The CPA is also keen to encourage the use of recycled aggregates in construction projects to reduce reliance on

primary aggregates. It is not clear where any of the imported materials will be coming from and the impact this will have on carbon emissions and traffic movements.

For imported construction materials to be considered as sustainable products they should include elements of recycled aggregates. To address this issue any grant of approval should be conditional on a Materials Management Plan being submitted and approved to accord with MLP policy MCS1 and NPPF paragraphs 140, 164 (b), 222 and 223.

**Waste and Other Materials**

There are no existing waste management sites in influencing distance therefore the “agent of change” principle set out in paragraph 200 of the NPPF and also policy CS 8 in the adopted Warwickshire Waste Core Strategy 2013 -2028 do not apply, so the CPA has no objections on waste safeguarding grounds.

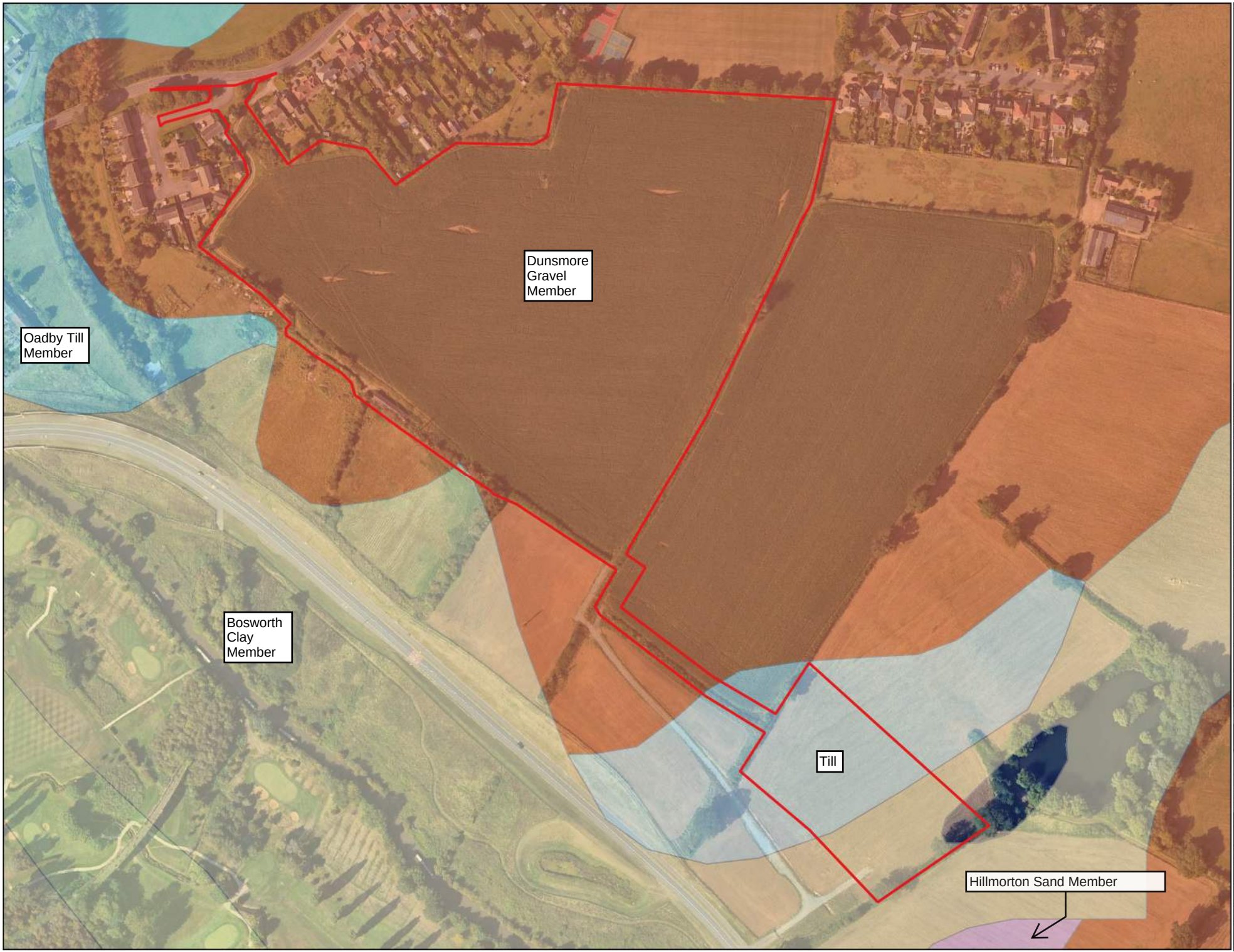
The CPA believes it is important to understand what will be done to the soils on site during the development. Soils are a valuable resource which needs to be protected. The CPA would wish to see that none of the soil resource is lost and that it is retained on site thus avoiding problems about materials being taken off site as part of the construction of the project. A planning condition should be imposed to deal with the submission and approval of a Soil Resources Management Plan in accordance with NPPF paragraph 187.

Yours sincerely

**Paul Wilcox**

Principal Planning Policy Officer on behalf of Planning Policy

# Appendix 4: Superficial Deposits Plan




0 10 20 30 40 50 m

Key :

Site Boundary

Background Mapping Layers

GBR BGS 1:50k Superficial deposits

Revision: A

Plan Title:
Superficial Deposits

Project:
Mineral Resource Assessment

Client:
Richborough

Site:
Land East of Rugby Road, Clifton upon Dunsmore

RS FP: 133468

Scale: 1:3,193
Date: 17/11/2025



fisher german
The Estates Office, Norman Court
Ashby de la Zouch,
Leicestershire, LE65 2UZ

01530 412821
https://www.fishergerman.co.uk

Drawing Ref:
25-11 Clifton upon Dunsmore Superficial Deposits Plan copy

# Appendix 5: Bedrock Geology Plan


0 10 20 30 40 50 m

Key :

Site Boundary

Background Mapping Layers

GBR BGS 1:50k Bedrock

Revision: A

Plan Title:
Bedrock Geology

Project:
Mineral Resource Assessment

Client:
Richborough

Site:
Land East of Rugby Road, Clifton upon Dunsmore

RS FP: 133468

Scale: 1:3,193
Date: 17/11/2025



fisher german

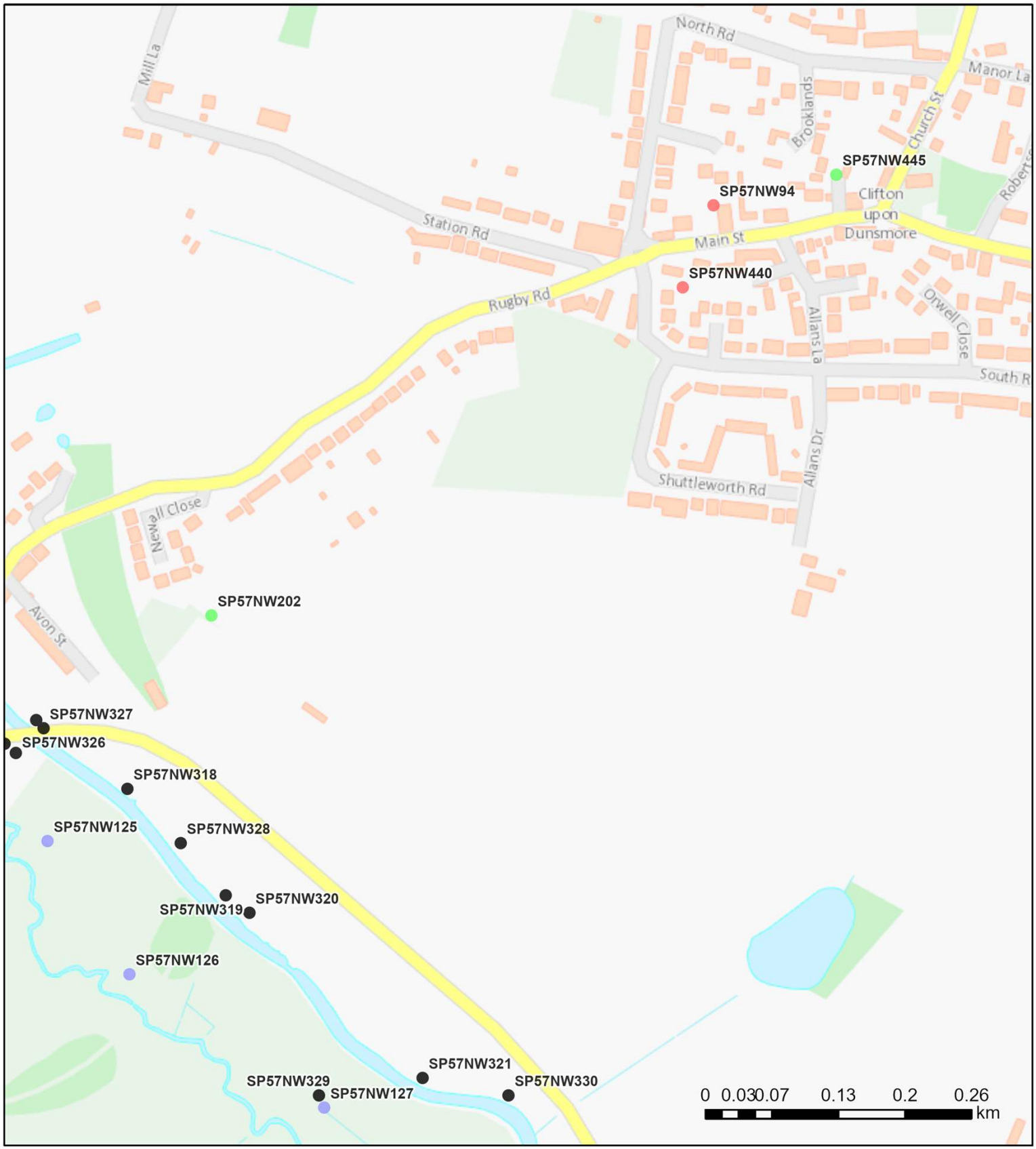
The Estates Office, Norman Court
Ashby de la Zouch,
Leicestershire, LE65 2UZ

01530 412821
https://www.fishergerman.co.uk

Drawing Ref:
25-11 Clifton upon Dunsmore Bedrock Geology Plan

# Appendix 6: Historical BGS Exploratory Hole Information

# Clifton upon Dunsmore



# Map Key

**Borehole records**

- Unknown Length
- Confidential
- 0 - 10m
- 10 - 30m
- 30m+

GEOLOGICAL SURVEY OF GREAT BRITAIN

# RECORD OF SHAFT OR BORE FOR MINERALS

(For Survey use only)

6-inch Map Registered No. SP 57 NW/94 (= 184/86)

Nat. Grid Reference SP 5293 7634

| 1"N.S. Map No. | 1"O.S. Map No. | Confidential or not |
|---|---|---|
| | | |

Name of Shaft or Bore given by Geological Survey: The Elms

Name and Number given by owner:

For whom made R.M. Trower

Town or Village Clifton upon Dunsmore County Warwick

Exact site (Attach a tracing from a map, or a sketch-map, if possible.)

Purpose for which made Water RWL 73ft

Ground Level at ~~shaft~~ bore relative to O.D. c. 385 If not ground level give O.D. of beginning of ~~shaft~~ bore

Made by Isler & Co Date of sinking c. 1900

Information from Date received

Examined by

## SPECIMEN NUMBERS AND ADDITIONAL NOTES

| (For Survey use only) GEOLOGICAL CLASSIFICATION | DESCRIPTION OF STRATA | THICKNESS Ft | THICKNESS in. | DEPTH Ft | DEPTH in. |
|---|---|---|---|---|---|
| Dunsmore Gravel | Dug well, Loamy sand 'Dugwell 6'6 | 20 | | 20 | 6·10 |
| Chalky boulder clay | Blue marl torchel or (20'?) | 11 | | 31 | |
| | Green sand | 18 | | 49 | |
| | Blue clay | 8 | | 57 | |
| | Red sand | 4 | | 61 | |
| | Blue clay | 2 | | 63 | |
| Wolston 'clay' | Blue sand | 10 | | 73 | |
| | Blue clay and sand | 13 | | 86 | |
| | Dead green sand | 4 | | 90 | |
| | Blue clay | 7 | | 97 | |
| | Hard sand | 3 | | 100 | |
| | Clay and sand | 30 | | 130 | |
| | Clay | 10 | | 140 | |
| Drift | Clay and sand | 21 | | 161 | 49·01 |
| | Blue lias | 4 | | 165 | |
| | Blue lias and stone | 3 | | 168 | |
| Lower lias | Blue lias | 39 | 6 | 207 | 6 |
| | Rock | 1 | 6 | 209 | |
| | Blue lias | 1 | 0 | 210 | |
| | Rock | 0 | 6 | 210 | 6 |
| | Blue lias | 0 | 6 | 211 | 64·31 |

C.B.H.34134-Wt.58370-Dd PS5I-2000-2/60

Institute of Geological Sciences

# RECORD OF SHAFT OR BOREHOLE

6-in or 1:10 000 Map Registration No.: SP57NW/202

National Grid Reference: 52447598

*Name and Number of Shaft or Borehole:* Vicarage Hill

*For whom made* IGS

*Town or Village* Clifton-upon- Dunsmore *County* Warks

*Exact site (reference to a fixed point on 1-in or 1:50 000 Map)*

1-in or 1:50 000 New Series Map No.: 184

Enter 'C' if Confidential

*Purpose for which made* Investigation of drift geology

*Ground level at* shaft / bore *relative to O.D.* 106.7 *m. If not ground level give O.D. of beginning of* shaft / bore _____ *m.*

*Made by* _____ *Date of sinking* 19/10/79

*Information from* Auger Samples *Examined by* M G Sumbler

Specimen Numbers and Additional Notes

B40 continuous flight auger, withdrawn and logged at 5ft depth intervals. Depths accurate to c. ± 20 cms

| Geological Classification | Description of Strata | Thickness *metres* | Depth *metres* |
|---|---|---|---|
| Dunsmore Gravel | Gravel, red-brown, poorly sorted. Loamy sand with abundant flint and Bunter-type pebbles. Some dark ferruginous patches. Becoming clayey downwards | 1.2 | 1.2 |
| Oadby Till | Clay, grey to fawn, with red sandy streaks becoming reddish-brown and gritty downwards with small pebbles of chalk, flint, and specks of coal, and green Keuper siltstone and red mudstone. Passing to | 0.9 | 2.1 |
| | Clay, grey with some brownish mottles, dying out downwards, stiff crumbly with abundant pebbles of chalk (sand grade up to 5 cms) and less abundant flint, and Jurassic limestone, and rare Bunter, red Keuper mudstone, and sandstone | | |

Institute of Geological Sciences

*Name and Number of Shaft or Borehole:*

Vicarage Hill

6-in or 1:10 000 Map Registration No.
SP57NW/202.

National Grid Reference
52447598

Page

| Geological Classification | Description of Strata | Thickness *metres* | Depth *metres* |
|---|---|---|---|
| | Brought Forward | | 2.1 |
| Oadby Till | (? Millstone grit). Becoming more silty from c. 9.7. Very vaguely layered - could be due to deformation by auger. Seen to | 11.7 | 13.84 |

M C Swinden
1979.

IGS 1805 3000 12/76

WD-2011-10

SP57/15

CLIFTON UPON DUNSMORE

# Daily Borehole Log

SP57 NW

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Site** | Home Farm | **Drill Method** | R/A | **Rig No.** | PSM16 | **Crew Names** | J Hall |
| **Client** | Richard Allen | **Hole Dia.** | 200mm | **Log No.** | 1 Of 3 | | D Bellamy |

| **Day** | Monday | **Date** | 05/07/10 | **Start** | 08:00 AM | **Stop** | 06:00 PM | **Borehole** | sp532753 |
|---|---|---|---|---|---|---|---|---|---|

| Strata Description | Metres | | | Samples | | |
|---|---|---|---|---|---|---|
| | From | To | Thickness | Type | Depth | no |
| Light brown sand with stones | G/L | 0.30 | 0.30 | | | |
| Brown sandy clay with some gravel | 0.30 | 6.00 | 5.70 | | | |
| Brown claybound sand with stones | 6.00 | 6.90 | 0.90 | | | |
| Water strike @ 6m | | | | | | |
| Firm grey clay with small stones | 6.90 | 16.00 | 9.10 | | | |
| Firm to hard grey clay with mudstone pieces | 16.00 | 25.00 | 9.00 | | | |
| Water strike @ 22m | | | | | | |
| End of day | | | | | | |
| *Drilled this shift* | | | 25.00 | | | |

| Time of Day | 08:00 AM | 06:00 PM | Daywork, Chisel, etc. |
|---|---|---|---|
| Depth of Water | | | |
| Depth Cased | | | |
| Depth of Hole | | | |

*Remarks:*

*Signature on behalf of client:* _____

**Drilling and Servicing Co Ltd** http://www.dac-online.co.uk

11 Bennetts Hill, Dunton Bassett, Lutterworth, LE17 5JJ.
Tel: 01455 209314 Fax: 01455 202651 Mobile: 07836 665478/7

SP57/15

# Daily Borehole Log

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Site** | Home Farm | **Drill Method** | R/A | **Rig No.** | PSM16 | **Crew Names** | J Hall |
| **Client** | Richard Allen | **Hole Dia.** | 200mm | **Log No.** | 2 Of 3 | | D Bellamy |

| **Day** | Tuesday | **Date** | 06/07/10 | **Start** | 08:00 AM | **Stop** | 06:00 PM | **Borehole** | well |
|---|---|---|---|---|---|---|---|---|---|

| Strata Description | Metres | | | Samples | | |
|---|---|---|---|---|---|---|
| | From | To | Thickness | Type | Depth | no |
| Firm to hard grey clay with hard grey clay pieces | 25.00 | 32.70 | 7.70 | | | |
| Hard grey clay with mudstone bands | 32.70 | 71.00 | 38.30 | | | |
| Hard grey clay with mudstone bands and occasional stones | 71.00 | 81.57 | 10.57 | | | |
| Borehole completed | | | | | | |
| Water strikes @ 41m, 45.90m, & 72M | | | | | | |
| Installation | | | | | | |
| 125mm 1mm slotted pvc liner 81.57m - 40.27m | | | | | | |
| 125mm plain liner 40.27m - g/l | | | | | | |
| 10mm gravel pack 81.57m - 20m | | | | | | |
| Bentonite cement seal 20m - g/l | | | | | | |
| Borehole pumped between 2m3 and 0.750 m3/hr | | | | | | |
| Start 20.94 | | | | | | |
| 1min 24.40 | | | | | | |
| 2min 27.10 | | | | | | |
| 5min 31.35 | | | | | | |
| 15min 38.20 | | | | | | |
| 30min 49.80 | | | | | | |
| 45min 58.80 | | | | | | |
| 2hr 50.40 | | | | | | |
| 3hr 32.10 | | | | | | |
| 3½hr 37.45 | | | | | | |
| 4hr 42m | | | | | | |
| *Drilled this shift* | | | 56.57 | | | |

| **Time of Day** | 08:00 AM | 06:00 PM | Daywork, Chisel, etc. |
|---|---|---|---|
| **Depth of Water** | | | |
| **Depth Cased** | | | |
| **Depth of Hole** | | | |

**Remarks:**

*Signature on behalf of client:* _____

**Drilling and Servicing Co Ltd** http://www.dsc-online.co.uk
11 Bennetts Hill, Dunton Bassett, Lutterworth, LE17 5JJ.
*Tel: 01455 209314 Fax: 01455 202651 Mobile: 07836 665418/7*

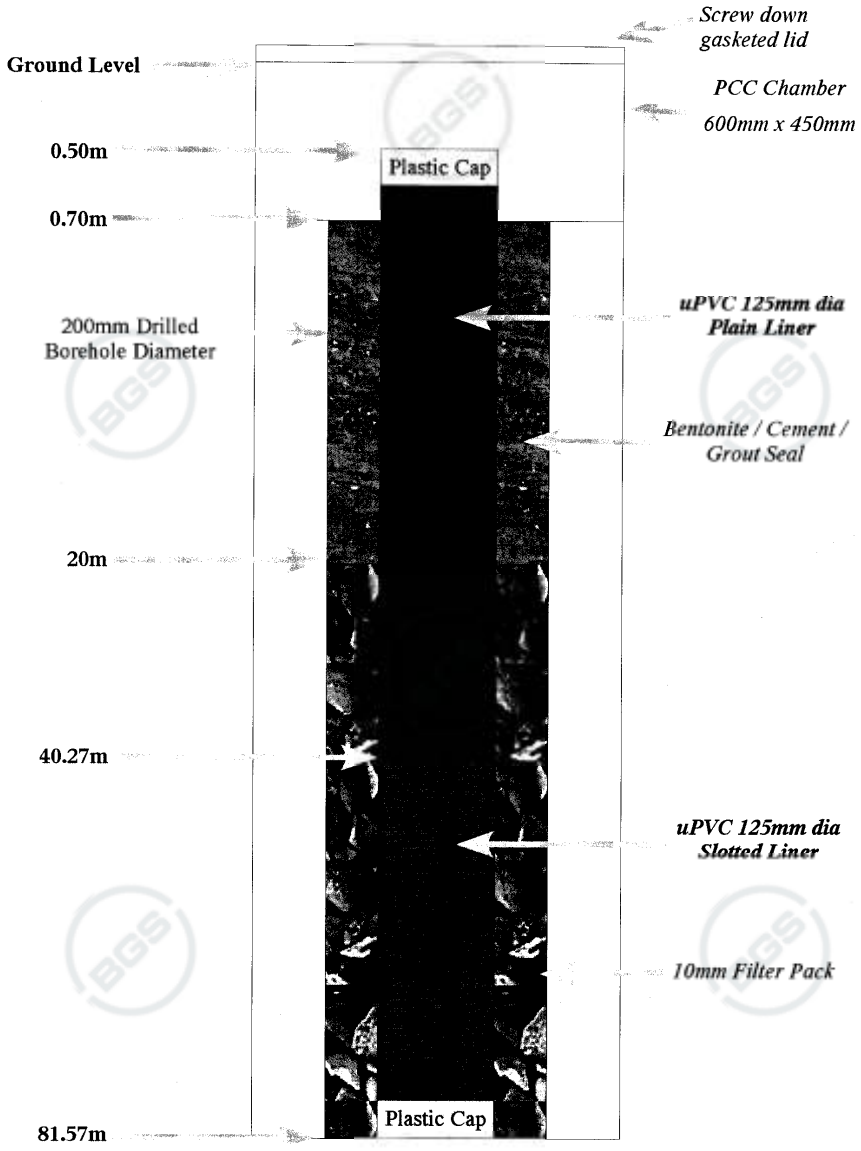
SP57/15

# Daily Borehole Log

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Site** | Home Farm | **Drill Method** | R/A | **Rig No.** | PSM16 | **Crew Names** | J Hall |
| **Client** | Richard Allen | **Hole Dia.** | 200mm | **Log No.** | 3 Of 3 | | D Bellamy |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Day** | Wednesday | **Date** | 07/07/10 | **Start** | 08:00 AM | **Stop** | 06:00 PM | **Borehole** | well |

## Borehole Installation Details (Not To Scale)




**Drilling and Servicing Co Ltd** http://www.dsc-online.co.uk
11 Bennetts Hill, Dunton Bassett, Lutterworth, LE17 5JJ.
Tel: 01455 209314 Fax: 01455 202651 Mobile: 07836 665418/7