

Clifton Upon Dunsmore Parish Council Response

Planning Application Ref: R25/0565

Land Southeast Of, Rugby Road, Clifton Upon Dunsmore

1. Introduction

In preparing this response we have consulted extensively with residents and others with an extraordinary Parish Council meeting held on 8th September 2025 at the Townsend Memorial Hall in Clifton (7.30pm) to discuss this outline planning application. As a result, Clifton upon Dunsmore Parish Council is writing to make you aware of the strong objections that it and the wider community have regarding the above unacceptable proposal.

As you will be aware, there is substantial opposition to the proposal as reflected in the number of formal objections to made by local residents and others. We have, through our meetings and consultations, gathered an overall view which is expressed here. It may not align with every individual who may have put in an individual submission, and we fully acknowledge that an individuals' opinion matters as they will reflect their own interests.

While the proposal is not without some benefits, in particular, the provision of general and affordable housing, these would not outweigh, by a wide margin, the harm it would cause. Richborough Estates, as land agents, openly talk about this being a 3-phase strategy for a large parcel of land right across the back of Clifton from Rugby Road to Hillmorton Lane (ref the land offered in the call for

sites). This outline planning R25/0565 as proposed is what they refer to as phase1. It is a 30% increase in houses in Clifton. The inclusion of the final additional 2 phases would total 700 houses and would increase the village size by up to 130%. Agreement to this application could be logically construed as a green light for developing and submitting the proposals for the further two phases. This would put us on course to merging Clifton with Rugby and Houlton

2. Phase 1 Ref This Proposal

As it stands Phase 1 (This outline application) as it stands risks worsening congestion, air quality, and infrastructure. It also threatens biodiversity and landscape character.

The site lies outside the approved settlement boundary, on agricultural land that serves as a vital green buffer and directly conflicting with Rugby's current Local Plan objectives and was excluded from the draft of the new local plan 2045.

In summary, this is a highly speculative and unsustainable development. It would place unacceptable strain on already creaking infrastructure, undermine village cohesion, and cause lasting environmental harm.

3. Local Planning Policies

Turning to the main reasons why we consider it should be refused in more detail as **this proposal is contrary to national and local planning policies** and would set a dangerous precedent.

Planning rules are clear and explicit that planning decisions should be made in accordance with the planning policies in force for that area unless exceptional circumstances exist. As paragraph 3 of the National Planning Policy Framework (NPPF) states "Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise".

The proposal is not in accordance with the development plan nor does the special circumstances required not to make a decision in accordance with it exist.

Policy GP 2 of the Rugby Local Plan sets out the 'Settlement Hierarchy' for the Borough, and in doing so identifies five tiers of settlement – Rugby Town, Main Rural Settlements, Rural Villages, Countryside and Green Belt. Within the Settlement Hierarchy Clifton Upon Dunsmore is defined as a Main Rural Settlement, "Development will be permitted within the existing boundaries of all Main Rural Settlements and on allocated sites".

The Main Rural Settlements have defined boundaries, or 'limits of development'. Beyond the Settlement Boundary is countryside. The application site lies beyond / outside the settlement boundary for Clifton upon Dunsmore and so is in the countryside.

The proposal is for outline planning permission to erect up to 160 dwellings etc. on the site, which is in the countryside. Under Local Plan Policy GP2, this fundamentally does not comply with the settlement hierarchy and overall growth strategy.

The settlement hierarchy and overall growth strategy are designed to ensure new developments satisfy the fundamental principles of sustainability (a theme that we will explore further later), and so it follows

that where a proposal such as this fails to comply with them then it will be unsustainable.

The application site is not identified for development in the existing or emerging Local Plan for the Borough. Indeed, the site was not considered for development in the new "Draft Local Plan (2045)" which is currently at the regulation 18 consultation stage; even though it was offered up during an earlier call for sites. RBC considered that this site was deemed less suitable as it was remote from the village, on sloping ground, limited access and outside of the settlement boundary being too close to Rugby.

Furthermore, there are no exceptional material circumstances, which override the Local Plans policy's position. The proposal is, therefore, contrary to Policy GP2 of the Local Plan, and paragraphs 2, 7-15 and 48 of the National Planning Policy Framework (NPPF), comprising unsustainable development and planning policy decisions should be plan led.

If approved, it would also create a dangerous precedent for similar speculative housing development across the Borough.

It has been brought forward prematurely and entirely speculatively from the adoption and due consideration of the emerging 2045 Local Plan for the Borough. If approved, it would undermine the aims and intentions of the local plan and wider plan making process.

4. Unacceptable Adverse Impact on Services

Clifton Upon Dunsmore has limited facilities and services, many of which are already struggling to cope with demand.

There is insufficient capacity in key services and infrastructure. Local roads and access are inadequate and unsafe, local schools and broadband are already at full capacity and public transport is limited.

Just to give one good, detailed example in respect to school provision.

Clifton Upon Dunsmore Church of England Primary School is currently close to capacity. UK Gov statistics say the school capacity is 226 with 224 pupils currently enrolled. This development would fall within Warwickshire CC school's admission priority area for this school. The school itself is "landlocked" with no land to develop/expand further, having already used part of the playground/car park for additional classrooms.

Access to the school is on a busy road junction currently exacerbated by poor parking during chaotic drop off and pick up times.

The 160 new houses could not be served by the existing school in the village.

Further, there is no provision of secondary education in the local area, and any additional housing in the area would require busing more pupils to their respective schools. The new Houlton secondary School has just closed its future admissions from Clifton pupils.

That Clifton Upon Dunsmore had minimal services, and infrastructure is recognised in the Local Plan that states at paragraph 3.11 'Main Rural Settlements have a sufficient level of services, or access to services to allow for development within the existing settlement boundaries. This further borne out by a study undertaken by RBC in support of the Local Plan which looked at settlements on sustainability grounds. This gave

Clifton Upon Dunsmore a score of 36 which is the 2nd lowest score of the main Rugby settlements.

While the proposal includes some measures to improve the provision of some local services and facilities, these are inadequate to meet the anticipated local demand of the development. It would, therefore, have an unacceptable impact and cause harm on the physical and social local infrastructure, especially due to insufficient capacity in schools, health and other infrastructure.

As such the proposal does not provide for the delivery of the necessary infrastructure (e.g. education provision, roads, broadband, public transport and medical) required to mitigate the direct impacts of the development and, therefore, fails to comply with national and local planning policies including Local Plan Policy D3: Infrastructure and Implementation, with its requirement that "The delivery of new development will be dependent on sufficient capacity being available in existing infrastructure and/or measures being proposed to mitigate its impact".

5. It does not represent sustainable development.

National and local Planning policies aim to direct development to the most sustainable locations. As the NPPF states at paragraph 7 "The purpose of the planning system is to contribute to the achievement of sustainable development".

This site is not in a sustainable location. It is a greenfield site in the countryside.

By their nature, sites in the countryside are less sustainable due to developments in such locations often exacerbating car reliance and

putting new homes in locations that are not well-served by existing physical and social infrastructure. As is the case here.

While Clifton Upon Dunsmore has some services and facilities, these are very limited – a pub, village hall, a few shops and an oversubscribed primary school.

This means that residents of the development will need to access other services, such as secondary schools, medical facilities, shops and employment in larger settlements. This is likely to require access by a private car, public transport or cycling.

In terms of public transport, this (at best) is very poor. The closest bus stop to the site (at Clifton Village Stores) is uphill and approximately 600 metres away. While there are other bus stops in the village such as at Rugby Road these are further away and similarly uphill. It is served by the Flexibus (Woodlands – Clifton- (Coton Park)), which provides a very limited day time service about every 80/90 minutes, with no services in the evening and on a Sunday. Pedestrian access from the site to the bus stop is also poor, uphill and not safe especially during the evening and at night.

Existing cycling connections to the site and the surrounding area are similarly at best poor. There are no designated cycle paths in the surrounding area for example. With respect to access the proposed site is, for all intents and purposes, at the bottom of the hill. This will require significant levels of fitness to overcome to cycle up into the village or the centre of Rugby. Rugby Road/Vicarage Hill is terribly busy and congested. Traffic calming adds significant difficulties for cyclists trying to avoid road cushions and potholes. The disused railway bridge on Rugby Road is a pinch point where cyclists have been knocked from their bikes. The

application makes great play of cycling as an option; this is fantasy and a tick box in the application, but not realistically practicable or sustainable.

Similarly, walking is difficult especially for the impaired, children or carrying shopping etc, with an uphill walk into the village and into Rugby centre. The footpath down Rugby Rd towards Rugby only goes as far as the canal bridge where it is necessary to cross the road, with no pedestrian crossing. There is a separate pedestrian bridge to the side of the canal bridge 66. The planning application talks about the use of the canal, which is not sustainable from the perspective of the towpath becoming muddy and slippery during wet weather. Suitable for a leisure walk or a dog stroll but not suitable as a sustainable form of access to the locale.

While the proposal includes some measures (often vague) to improve the accessibility and sustainability of the development, these are insufficient by a wide mark to make it genuinely sustainable.

As such it conflicts with national and local planning policies that require development to be easily accessible by sustainable transport options and it is resident not dependent on a private car to access key services to meet their day-to-day needs, as is the case here.

A view previously shared by RBC who determined not to consider the site for development in the new "Draft Local Plan (2045)" which is currently at the regulation 18 consultation stage; even though it was offered up during an earlier call for sites. One of the main reasons why RBC determined not consider that this site was that it was unsustainable due to factors such as its remoteness from the village, on sloping ground, limited access to key services and infrastructure.

6. Adverse Impact on the Landscape

The proposal would have a significant harmful effect on the landscape character, distinctiveness and appearance of the area. Especially as it would result in encroachment and urbanisation of the open countryside. That the site is in the countryside is not disputed by any parties.

The NPPF at paragraph 180 requires that planning decisions should contribute to, and enhance, the intrinsic character of the countryside including by “protecting and enhancing valued landscapes”.

This national requirement is articulated and reinforced in local planning policies. Of particular relevance here is local plan policy NE3: Landscape Protection and Enhancement, which states “New development which positively contributes to landscape character will be permitted”. It also requires that development proposals, amongst other things, “Relate well to local topography and built form and enhance key landscape features, ensuring their long-term management and maintenance”.

There is no doubt that the proposal would seriously harm the landscape and, as such it is contrary to national and local planning policies.

The site falls within the Dunsmore Landscape’ Character Area (LCA) according to RBC’s Landscape Character Assessment published this year.

RBC further divide this landscape character areas into smaller types. The site lies within the Dunsmore Plateau Fringe Landscape Type, which is described as “Plateau Fringe is a variable, farmed landscape with a gently undulating topography of low rounded hills and narrow meandering river valleys of the Avon and Leam. The Plateau Fringe is characterised by its large arable fields and poorly defined field patterns, interspersed with pockets of permanent pasture, river meadowland and small hedged fields.

Small, nucleated villages are a characteristic feature, comprising of loose clusters of dwellings and isolated, brick-built farmsteads.”

That the site is a good example of and consistent with the Dunsmore Plateau Fringe Landscape Type – is acknowledged by the applicant, which in their landscape assessment states: “BLADE considers that the description of the Landscape Character Area and the smaller Dunsmore Plateau Fringe Landscape Type is broadly consistent with the landscape character and typical features of the Site’s receiving environment.”

Clifton Upon Dunsmore is situated on top of a significant hill 120 metres above sea level. All access to the village centre is uphill. It is recognised by RBC as a distinctive hilltop settlement “Upon” Dunsmore – *The name Dunsmore, Anglo-Saxon in origin, is a combination of the Old English personal name Dunn or dūn {meaning "hill"} and mōr {meaning "moor" or "heath"}.*

The site comprises a sizeable prominent greenfield site abutting the built-up south-western edge of the village. It is highly cherished and held in great esteem by the local community.

It is clearly visible from several locations both near and far, especially when viewing the site from the south and on the approach to Clifton Upon Dunsmore from Rugby and the golf course or passing Clifton on the Houlton Way.

It is important for the character and setting of the village. There is little land as it is that separates Rugby from the village. Rugby Road is already a ribbon development; the land proposed in this application will further erode the distinction between Rugby and the village. Whilst not designated Green Belt, it is an important green piece of agricultural land

that separates the two conurbations. If approved, Clifton Upon Dunsmore runs the risk of becoming a suburb of Rugby.

As such, the proposed development with its introduction of domestic buildings, substantial parking etc, would result in significant and permanent harm to the landscape, character, appearance, local identity and distinctiveness.

It would appear as a highly visible and undesirable development that encroaches into prominent, open and attractive countryside and is unrelated to and detracts from this predominately rural and open landscape.

It would result in a completely negative change in the character and distinctives of the landscape and certainly cannot be considered to protect and enhance the local landscape character and local identity as required by local and national planning policies.

7. Impact on highway safety and the network

It should be noted that the Council has commissioned its own independent review of the highway implications on the proposal. This attached document forms an integral part of the Parish Council's submission and must be read in conjunction with it.

Their report clearly shows that there are clear grounds for objection on highway safety ground. It also shows that the independent report submitted by the applicant is deficient and lacking in several respects.

It concludes, "In summary, it is considered there are grounds for objection to the application. Insufficient data has been provided that would allow for a decision to be made about the severity of the impact on the highway.

- The TA refers to a further Addendum (TAA) which will provide further details on the traffic implications of the Development, as well as additional proposals for highway improvements on Rugby Road. This is not yet available and therefore there is currently insufficient information available in order to determine the application. The lack of further detail also means that the Development cannot, at this time, be said to not have an 'unacceptable impact on highway safety' as required by NPPF.

The application should be refused until such time that the TAA has been submitted and subsequently made available for public comment.

- The assertion in the TA (para 4.58) that the 'future residents of the site will be able to travel by several sustainable travel options' is extremely optimistic and it is considered the Development does not meet the sustainable policy objectives of LTP4, Rugby Net Zero and other active travel ambitions.
- The application should be refused on sustainability grounds unless more defined, area-wide proposals for improving access by more sustainable modes such as cycling, walking and public transport are developed in principle.
- The proposed access on Rugby Road should be re-considered to improve access by sustainable modes and an improved junction layout be developed and consulted upon."

A summary of Vehicle Count undertaken by the Parish council conducted on Rugby Road (adjacent to Newall Close) 20th Sept – 26th Sept 2025 Shows Over 6,000 vehicles per weekday use the road – (Further data to be published when available)

Vehicle Flow

	20/09/2025	21/09/2025	22/09/2025	23/09/2025	24/09/2025	25/09/2025	26/09/2025
	Saturday	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday
Rugby Rd							
Eastbound	2337	1933	3134	3216	3240	3240	3259
Westbound	2341	2009	3256	3488	3452	3317	3404
Total Vehicles	4678	3942	6390	6704	6692	6557	6663

Peak flows can be up to

Ave 08:00/09:00 – 669 Vehicles/Hr
 17:00/18:00 - 588 Vehicles/Hr

According to 2024 data from the RAC Foundation, the average traffic flow on urban minor roads was about 2,100 vehicles per day. This is an unclassified road, having been declassified from a B road some time ago therefore 6,000 vehicles are nearly 3X above average considering the restrictions and road condition.

8. Harm to Biodiversity Assets

Paragraph 180 of the NPPF requires planning decisions to minimise impacts on biodiversity and provide net gains where possible.

While the site does not contain any nationally or locally recognised sites, this does not mean that it is not of biodiversity value. Its relatively open and undeveloped nature and the presence of hedgerows (some historic), trees and other environmental features provide important and much-

valued habitats for a variety of wildlife and wildflowers. Indeed, it supports a variety of species some protected, such as badgers.

Many of these habitats and features will be unacceptably adversely affected by the proposal.

Whilst it is recognised that the proposal includes some measures to mitigate its impact on biodiversity, which are welcomed, these, however, are deficient and will not compensate for the damage it will cause to local biodiversity in terms of retention, enhancement or compensation for any proposal, as required by local and national planning policies.

For example, it is unclear what the intention is for many of the important biodiversity features of the site, including:

- There appears to be a lack of tree planting on this proposed site, and generally opportunities to provide this have been overlooked. The area of land which the applicant suggests could be added to the Playing Field could have a small wood, for example. This planting could be a community orchard as is popular and is promoted in the Local Plan.
- It does not provide a corridor to access the lake and woodland in the adjacent fields.
- There should be provision for a corridor to the wilded land adjacent to Houlton Way.

9. Impact on power cables

We are concerned about the impact the development will have on the 11Kv power cables that traverse the site. It appears that no serious consideration has been given by the applicant to whether the cables will remain or need to be buried.

10. Misleading and Inaccurate Statements

We are concerned about some of the statements made by the applicant in the planning application and supporting documents, which are often incorrect and/or misleading. Just to provide a few good examples of this:

- The submission states “the village enjoys close ties with neighbouring communities including Rugby and the historic village of Dunchurch”. This is simply not true and their assessment that Dunchurch is 2Km away is false. The village and Dunchurch has no community/ currently celebrated historical ties.
- The developers declare there is a need for additional sports and recreational space in the village. The Parish Council currently operates a sports field and pavilion with a football pitch, three tennis courts and a pickleball court with plans afoot for a croquet lawn as well as a play park and exercise trim trail, with planned investment of £80,000 to upgrade and update the facility already in place. The recreational facilities are in a healthy position.
- The proposal assumes an access point to Shuttleworth Road from the play area in the development through the existing Clifton village playing field. This is owned by the Parish Council and also used by the school. No permission has been given for this access proposal

and there are covenants in place as to the permitted use of this land and any resale.

11. Conclusion

Can we stress that we are not NIMBYS or opposed to housing development in principle.

Clifton Upon Dunsmore has already built or planned more than 9,000 houses within its original Parish boundary- (before boundaries were redrawn). This includes major developments such as at Brownsover East (Strawberry Fields) and the proposed 6,000 houses in the new town of Houlton.

The residents of the parish really think that they have done their bit for housing development of this size.

For these and other compelling reasons we would strongly urge that this planning application be refused.