

Mr. R Holt,
Head of Planning and Culture,
Technical Services Dept
Rugby Borough Council
P.O. Box 123
Town Hall
Rugby
CV21 2ZP



Planning and Environment

John Robinson
Senior Historic Environment Officer
Archaeological Information and Advice
Shire Hall
Warwick CV34 4RL

your ref R25/565
my ref JR/R/R25_0565.1
date 3rd September 2025

Tel: 01926 412276
johnrobinson@warwickshire.gov.uk

F.A.O. Lucy Davison

Dear Mr. Holt,

Location: Land South East Of, Rugby Road, Clifton Upon Dunsmore

Proposed: 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).

ARCHAEOLOGICAL COMMENT

Thank you for your consultation. The proposed development is located within an area of significant archaeological potential. The application site is located adjacent and to the west of two undated (potentially Iron Age or Roman) sub rectangular enclosures visible as cropmarks on aerial photographs (Warwickshire Historic Environment Record ref. MWA4164). Cropmark evidence for further enclosures and linear features located approximately 450m to 1,000m to the west of the proposed scheme (MWA4161, MWA4162, MWA4163, MWA6808 and MWA6809) are suggestive of relatively concentrated occupation activity across this area during the Late Iron Age or Roman periods. Previous archaeological fieldwork undertaken approximately 500m to 900m south of the proposal identified a range of features comprising ditches and pits containing Iron Age and Roman material including pottery, fired clay and charred material indicative of domestic settlement waste (MWA30612). Two Bronze Age palstaves (MWA20556 and MWA 21471) have been recovered approximately 450m to the northwest of the application site suggesting activity across the wider area at that time.

The course of the River Avon runs approximately 600m to the northwest of the application site. Rivers are known to have represented an important exploitable resource throughout prehistory and later periods, often considered to be of ritual significance, and would have formed part of a wider communication network. The Avon Valley Catchment area in Warwickshire is highlighted within the West Midlands Regional Research Framework¹ as containing one of the

¹ Watt. S (ed), 2011, The Archaeology of the West Midlands: A Framework for Research, Oxbow Books.

highest concentrations of known Neolithic and Bronze Age monuments within the West Midlands.

I would not agree with the conclusions of the Heritage Impact Assessment² submitted with the information accompanying this application that the proposed scheme will have a low potential to impact upon remains dating from the prehistoric or Roman periods. Instead there is at least a moderate potential for archaeological deposits from those periods to survive within the site. In the absence of sufficient baseline information what is not currently understood is age, depth, extent and significance of any archaeological remains should they be present within the site.

I am of the opinion that the archaeological implications of this proposal cannot be adequately assessed on the basis of the available information.

I would therefore recommend that the applicant be requested to arrange for an archaeological assessment to be undertaken of the site before any decision on the planning application is taken. This will help to define the character, extent, state of preservation and importance of any archaeological remains present and will also provide information useful for identifying potential options for minimising or avoiding damage to them.

The results of this assessment should be provided before any decision is taken so that an informed and reasonable planning decision can be reached, and the application modified if appropriate.

I would envisage this evaluation comprising a programme of geophysical survey and trial trenching. The results of the geophysical survey will inform the scope of the trial trenching.

The results of this work should be provided prior to the determination of the planning application. If the applicant is unwilling to supply this information as part of the application, it may be appropriate to consider directing the applicant to supply further information under regulation 4 of the Town and Country Planning (Applications) regulations 1988, or to refuse the application as being inadequately documented.

This recommendation conforms to the approach set out in the National Planning Policy Framework (NPPF) and is consistent with recent advice given in respect of other application sites in the wider vicinity.

If your Council is minded to refuse permission for this development on other planning grounds, and the applicants have not carried out an archaeological assessment, we recommend that the absence of an assessment and the possible adverse consequences of the development should be included as a reason for refusal, in order to ensure that the archaeological issues are given adequate consideration in any subsequent appeal. In these circumstances I suggest that the following wording would be appropriate:

Having regard to the provisions of NPPF and Policy SDC3 of the Rugby Borough Council Local Plan 2011-2031 the Local Planning Authority, in consultation with the Warwickshire County Council Archaeological Information and Advice Team, raises objection to the proposed development on the grounds that the scheme is not supported by an archaeological site assessment which would have enabled a proper and detailed assessment of the character and extent of any archaeological features of importance likely to be threatened by the proposed development and possibly worthy of conservation in whole or in part or of being fully investigated and recorded.

Should you have any further questions please do not hesitate to contact me.

² Hudson-Brown. A, Lington. T and Partington. A, 2025, *Land East of Rugby Road, Clifton-Upon-Dunsmore: Heritage Impact Assessment*, Marrons

Yours sincerely,

John Robinson
Senior Historic Environment Officer