

BY EMAIL ONLY

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Your Ref: R25/0565

Date: 11<sup>th</sup> December 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 26<sup>th</sup> November 2025 reconsulting the County Planning Authority (CPA) on the minerals and waste implications of the above-mentioned planning application following the receipt of further information namely a Mineral Resource Assessment – 19<sup>th</sup> November 2025. This application therefore has been reassessed against policies MCS5 and DM10 in the adopted minerals local plan and policy CS8 in the adopted waste plan.

The CPA 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.

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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 CPA has given careful consideration to the conclusions and recommendations set out in Section 5 of the report and agrees that the resource is unlikely to be commercially attractive and that the site sits on the southern edge of the village limiting the options for extraction. The CPA agrees that a site-specific ground investigation should be carried out,

On this basis therefore **and subject** to a planning condition being imposed requiring a method for ensuring that minerals that can be viably recovered during the development operations are recovered and put to beneficial use and a method to record the quantity of recovered minerals (reused on site or off site) and to report this data to the CPA the authority raises **NO OBJECTIONS** to this planning application on mineral resource safeguarding grounds in accordance with policies MCS 5, and DM 10.

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