

## Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

Ref:

(For  
official  
use  
only)

**Name of the Local Plan to which this representation relates:**

Rugby Borough Council Proposed  
Submission Local Plan

**Please return to Rugby Borough Council by 5:00pm Friday 13<sup>th</sup> March 2026**

**By email to:** [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) with **Proposed Submission Consultation in the subject line, OR by post to:** Development Strategy, Town Hall, Evreux Way, Rugby, CV21 2RR.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

1. Personal  
Details\*

2. Agent's Details (if  
applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if applicable) but complete the full contact details of the agent in 2.*

Title	<input type="text" value="Mr"/>	<input type="text"/>
First Name	<input type="text" value="Andrew"/>	<input type="text"/>
Last Name	<input type="text" value="Moore"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Clifton upon Dunsmore Parish Council"/>	<input type="text"/>
Address Line 1	<input type="text" value=""/>	<input type="text"/>
Line 2	<input type="text" value=""/>	<input type="text"/>
Line 3	<input type="text" value=""/>	<input type="text"/>
Line 4	<input type="text" value=""/>	<input type="text"/>
Post Code	<input type="text" value=""/>	<input type="text"/>
Telephone Number	<input type="text" value=""/>	<input type="text"/>
E-mail Address	<input type="text" value=""/>	<input type="text"/>

(where relevant)

## Part B – Please use a separate sheet for each policy or site you wish to comment on

Clifton upon Dunsmore Parish Council

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph

Local Plan Policy

EN4  
Areas of Separation

Policies Map

Site ID

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

X

No

(2) is Sound

Yes

X

No

(3) complies with the  
Duty to co-operate

Yes

X

No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy: Environment - EN4 Areas of Separation

Clifton upon Dunsmore Parish Council, endorsed by our community, fully supports and endorses the EN4 Policy defining Areas of Separation on the policies map between Rugby town and Clifton upon Dunsmore.

We also fully support that development will only be permitted in these areas when it will not have a significant adverse impact, either alone or in combination with other existing or proposed development, on the effectiveness of an Area of Separation in protecting the identity and distinctiveness of settlements and preventing their coalescence.

Clifton upon Dunsmore is a distinctive separate hilltop settlement where it is "upon" a "Dunsmore" [*Dunsmore refers in Old English to elevated heathland in the area between Coventry and Rugby*] it is vitally important to the inhabitants that this distinctiveness remains intact. Clifton village residents were recently polled on their opinions of EN4. There was a response from **52%** the electorate where an overwhelming 527 were in favour of this policy and 7 were against.

These results are shared with the RBC planning team.

(Continue on a separate sheet /expand box if necessary)

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None

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**No**, I do not wish to participate in hearing session(s)

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(where relevant)

## Part B – Please use a separate sheet for each policy or site you wish to comment on

Clifton upon Dunsmore Parish Council

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	Site 129				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Clifton Parish Council's position is that we see a need for modest, sustainable growth in housing but for this to be sustainable and non-disruptive to already congested traffic. We are raising a question over the soundness of the plan regarding this allocation.

**Positively Prepared:** This site is adjacent to one of the key features of the village, the outstanding properties of the Old Manor (Grade 2 Listed) adjacent to the old duck pond site at the junction of Lilbourne Road and Hillmorton Lane which is within the Villages Conservation area. The inclusion of this development stops the Old Manor being the gateway to the village and significantly detracts from the character of this old and picturesque junction which is not suitable for increased traffic.

**Effective:** It's difficult to see this being delivered over the planned period as access onto Lilbourne Road up to the A5 is problematic for this development. The road is already badly paved, poorly marked with no current footpath linking it to the village. The junction onto the fast-moving A5 is dangerous due to restricted visibility to the left where traffic flows over a hill at speed, and the junction can be congested at busy times. The introduction of circa 100-120 more vehicles with such a development would be exacerbated the situation. Lilbourne Road is susceptible to surface water and flooding, being badly drained. The road is already restricted to 20, 30 and then 40mph due to its narrowness and soft verges and is unlit at night. It is difficult to see that updates to the road and junction would be

complete within the planned period and consented to by Warwickshire County Council, who would be a unitary authority by then.

(Continue on a separate sheet /expand box if necessary)

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The Development requirements for this site should include

- Upgrade required to Lilbourne Road up to and including the A5 junction

(Continue on a separate sheet /expand box if necessary)

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Title	Mr	
First Name	Andrew	
Last Name	Moore	
Job Title (where relevant)		
Organisation (where relevant)	Clifton upon Dunsmore Parish Council	
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		

E-mail Address  
(where relevant)

## Part B – Please use a separate sheet for each policy or site you wish to comment on

Clifton upon Dunsmore Parish Council

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph	<input type="text"/>	Local Plan Policy	<input type="text"/>	Policies Map	<input type="text"/>
Site ID	Site 202				

4. Do you consider the Local Plan:

(1) is Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) is Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(3) complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Clifton Parish Council's position is that we see a need for modest, sustainable growth in housing but for this to be sustainable and non-disruptive to already congested traffic. Parish Council may consider that this has the lowest impact of the sites proposed, should it go forward and, on that basis, support the proposal.

We agree that Access onto Newton Road would allow traffic to leave the village without having to go through the centre. However significant volumes would still transit through the already congested Village to Rugby and Houlton and would need to be mitigated.

Any new houses may not be visible from the village centre if Manor Lane provides screening.

(Continue on a separate sheet /expand box if necessary)

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It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Should this site be adopted the Parish Council would also require 30% affordable houses as well as bungalows within any proposal. This would align with Clifton upon Dunsmore's draft Neighbourhood Plan (currently going to referendum) to provide for reasonable growth that can be sustained.

(Continue on a separate sheet /expand box if necessary)

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### Part A

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Post Code	<input type="text" value=""/>	<input type="text"/>
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E-mail Address  
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## Part B – Please use a separate sheet for each policy or site you wish to comment on

Clifton upon Dunsmore Parish Council

3. To which part of the Local Plan does this representation relate?

Local Plan Paragraph

Local Plan Policy

Policies Map

Site ID

Site 307

4. Do you consider the Local Plan:

(1) is Legally compliant

Yes

**X**

No

(2) is Sound

Yes

No

**X**

(3) complies with the Duty to co-operate

Yes

No

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Clifton Parish Council's position is that we see a need for modest, sustainable growth in housing but for this to be sustainable and on disruptive to already congested traffic. The Parish Council does not support this allocation. We are raising a question over the soundness of the plan with regard to this allocation ref:

**Positively Prepared:** we consider it fails to meet the Cliftons objectively assessed needs for any such small development with respect to the restricted access to this site. The access from North Road is on a sharp blind 90° bend. The only site access available would be through the existing narrow farmers' gate entrance.

We understand that standard, adoptable residential roads in new housing developments typically have a carriageway width of 5.5m, which allows two cars to pass, while footways (pavements) must be a minimum of 2.0m wide on each side to ensure accessibility, where we believe the Farmers gate and access opening is currently approx. 8.5m.

**Justified:** We feel this this piecemeal development is not justified in what is proposed in the plan for Clifton Village as it would not be worth the disturbance during the build and then the ongoing disruption. There is the permanent problem of traffic on North Road being very tidal with drop off and pick-ups at the Clifton

school. This already creates significant additional traffic congestion and further restricts accessibility. Deliveries are already disrupted and local residents are concerned as to whether emergency service vehicles could get through. Parking in North Road on a narrow carriageway aligned with speed cushions makes the road impassable at times. This is emphasized when building work has been conducted on existing houses in the Road, who have off road parking, due to deliveries and contractor parking. This would be multiplied many fold during this sites development and would likely to continue for several years. This does not represent a benefit that outweighs against the cost and disruption to the community.

(Continue on a separate sheet /expand box if necessary)

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The 10 Houses projected for site 307 could easily be absorbed into the other sites proposed for Clifton - sites 129/202.

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