
14th April 2026

Rugby Road, Clifton on
Dunsmore

**Landscape Rebuttal
of Mr. Jonathan Berry
BA (Hons), DipLA,
CMLI, AIEMA,
M.Arbor.A**

Appeal between Richborough, and Rugby
Borough Council

Council Ref: R25/0565

Planning Inspectorate Ref: 6003106

Appeal Date: 28th April 2026

Report Number: 18741_R02_JB



Report No:	Date	Revision	Author	Checked	Approved
18741_R02	14 th April 2026	-	JB	Jonathan Berry BA (Hons), DipLA, CMLI, AIEMA, M.Arbor.A	

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- 1.1. This short 'Landscape Rebuttal' is produced by Jonathan Berry on behalf of Richborough (the Appellant), in response to the Proof of Evidence of Mr. Nigel Wakefield (covering Landscape and Visual matters on behalf of Rugby Borough Council).
- 1.2. Direct reference has been made to the respective paragraph numbers and appendices of the Council's evidence, and the main topics of dispute are set out below. The fact that I have not responded to a particular point should not be taken as implying that I agree with it.
- 1.3. I focus upon Mr. Wakefield's (NW) consideration of the relative merits of the Appeal Site in relation to the proposed Allocated Sites from a landscape and landscape visual perspective.

Mr. Wakefield's Previous Stance on Land off Station Road, Clifton-upon-Dunsmore

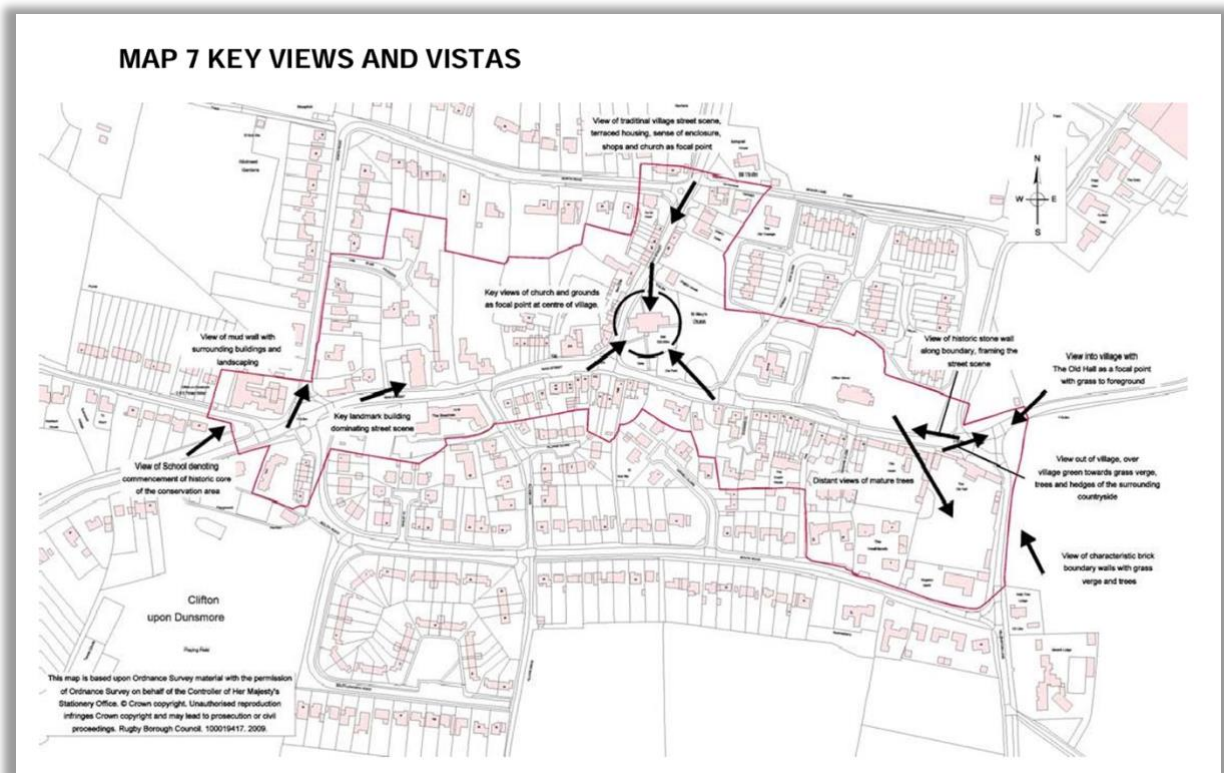
- 1.4. As set out at para. 6.117 of my PoE, it is important to reiterate that in October-November 2025, NW acted for Savills and the Archdiocese of Birmingham on other land to the west of Clifton-upon-Dunsmore (see Appendix 1). The land was located opposite the Appeal Site, off Station Road and referred to as Sunnycroft Farm on OS Maps.
- 1.5. NW challenged the identification and criteria for the Neighbourhood Plan's 'Important Views', specifically Viewpoints 5, 6 and 7, which related to the site. Also, NW deemed the land capable of development with appropriate mitigation measures in place, such as providing view corridors, development off-sets and screen planting.
- 1.6. That land is located within the Area of Separation and was labelled as 'Site 344' as promoted in the 'Call for Sites'. As with the Appeal Site, it was located within the Dunsmore Plateau Fringe LT and considered to be of medium sensitivity. The site has sloping landform (86m AOD to 110m AOD) with a topographical range of 24 metres.
- 1.7. As set out at para. 6.43 of the Areas of Separation Study Report (see CD5.45):

"Development of sites 55 and 344 would compromise the open countryside which acts to separate the town from the west of the village, with 344 also causing there to be a loss of the remaining sense of separation provided by western views from Rugby Road, exacerbating the urbanising influence of the existing ribbon development."
- 1.8. The stance taken by NW on the above site, which is not dissimilar in location, categorisation of character type, view availability and landform, appears wholly inconsistent with the stance he has taken with regards to the Appeal Site.



Impact on Important Views

- 1.9. With reference to the Allocated Sites, at para. 8.2, bullet-point 2, NW states that *“They do not impact on any important views as identified in the Clifton Upon Dunsmore Neighbourhood Plan in the same way as the appeal site does”*. In my opinion this is misleading.
- 1.10. ‘Important Viewpoint 3’ is located to the immediate south of ‘Site 129’ and is described at para. 5.29, page 52 of the CUDNP (CD5.27) as the *“Gateway view (west) into Clifton upon Dunsmore village from Lilbourne Road, with Old Hall Cottage and The Green”*.
- 1.11. Furthermore, Map 7 from the Clifton-upon-Dunsmore Conservation Appraisal (extracted below from page 30 of CD5.49), shows a ‘Key View & Vista’ from within Site 129, and a reference to the *“View into village with Old Hall as a focal point with grass to foreground”*.



- 1.12. ‘Important Viewpoint 1’ is located to the immediate west of ‘Site 202’ and is described at para. 5.29, page 51 of the CUDNP (CD5.27) as *“Gateway view (south) of Clifton upon Dunsmore village from Newton Road”*. Site 202 is clearly visible within the Viewpoint 1 photograph contained at Appendix 4 of the CUDNP and Viewpoint 4, page 57 of NW PoE Appendix 8, as would any proposed development. The site currently has no existing landscape feature defining or enclosing its northern boundary.



- 1.13. 'Important Viewpoint 4' is located to the north of Site 202 and is described at para. 5.29, page 52 of the CUDNP (CD5.27) as "*Distant view south from Newton Road of Clifton upon Dunsmore village and surrounding fields*". The settlement edge including existing buildings associated with Buckwell Lane are visible through scattered tree planting, suggesting that any future development would also be visible in the view.
- 1.14. Site 202 is also visible from a public footpath which traverses the north-western corner of the site and a bridleway which adjoins the site to the east, see Viewpoint 1, page 54 of NW PoE Appendix 8 and Viewpoint 2, page 55 of NW PoE Appendix 8. Any proposed development would be clearly visible in the foreground of these recreational receptors.
- 1.15. Finally, 'Important Viewpoint 10' is located to the south-east corner of 'Site 307' looking west along the southern boundary. It is described at para. 5.29, page 52 of the CUDNP (CD5.27) as "*From the entrance to Cow Field, off North Road, Clifton, west across open countryside to the parish boundary*".
- 1.16. The Viewpoint 10 photograph contained at Appendix 4 of the CUDNP and Viewpoint 1, page 60 of NW PoE Appendix 8, illustrate that development of that site could restrict and alter views out and across the landscape.
- 1.17. The site currently has no existing landscape feature defining or enclosing its western boundary. It is clearly visible from the immediately adjoining allotments to the south and it adjoins single-storey dwellings.
- 1.18. Site 307 is visible from the surrounding landscape, with NW confirming at para. 8.42 of his PoE that "*The site is highly visible from the north and west due to its elevated nature*". At para. 8.43, NW also states that "*Although the views of Rugby town are expansive, there are no notable cultural heritage features in sight*". NW has not applied the same judgement when considering the views of Rugby from the Appeal Site. Neither policy nor the current evidence base make any reference to the need to consider views to and from distant heritage assets.
- 1.19. With regards to the Appeal Site and 'Important Viewpoint 9', it should be noted that NW incorrectly refers to the previous version of the CUDNP Policy EN7, which has been modified in response to the Independent Examiner (CD5.60), and is now presented as Policy ENV5 within the referendum version of the CUDNP (CD5.27).



Landform and Topography

- 1.20. At para. 8.2, bullet-point 3, NW states that *“The allocated sites sit on higher ground similar to the rest of Clifton-upon-Dunsmore and unlike the appeal site”*. Again, in my opinion this is misleading.
- 1.21. As set out at para. 2.5 of the JB PoE, the Appeal Site has sloping landform of 114m AOD in the north to 104m AOD in the west, with a topographical range of 10 metres. This is at a higher elevation and with a small topographical range than ‘Site 344’, which was previously being proposed by NW, as set out at para. 1.6 above.
- 1.22. The landform and approximate topographical range for the Allocation Sites is set out below:
- Site 129: 121-109m AOD (a topographical range of 12 metres);
 - Site 202: 118-107m AOD (a topographical range of 11 metres); and
 - Site 307: 110-103m AOD (a topographical range of 7 metres).
- 1.23. The topography is also illustrated on Figure 2.4, page 9 of NW PoE Appendix 2. This illustrates that the Appeal Site actually sits within a comparable range to the Allocated Sites and some of the existing properties beyond the core of Clifton-upon-Dunsmore. The existing properties along Rugby Road also occupy a lower topographical position (between 92m AOD to 115m AOD).

Urban Morphology and Village Character

- 1.24. At para. 8.2, bullet-point 5, of his evidence, NW states that *“The allocated sites are more sensitive to the urban morphology of Clifton-upon-Dunsmore and will create a compact nucleated urban form unlike the appeal site”* and, bullet-point 6 states that *“The allocated sites are more sensitive to the village and landscape character as they do not allocate all the housing on one site but spread it across three sites”*.
- 1.25. It is important to note that the Council’s Landscape Character Assessment (CD5.46) and the ‘landscape guidelines’ contained at para. 6.6.1, set out no requirement to respond to the urban morphology of Clifton-upon-Dunsmore, nor to safeguard the settlement as a compacted nucleated urban form.
- 1.26. Bullet-point 7 of the LCA landscape guidelines does include the aim to *“Protect and manage the historic character and settlement pattern”*; however, the Conservation Area Appraisal tells us on page 3 that:



“The Conservation Area covers the central core of the village. Main Street, Church Street and Lilbourne Road comprise the historic spine with the heart of the village at the meeting point of these roads. Parts of North Road, South Road and Hillmorton Lane complete the Conservation Area. The remainder of the village generally comprises twentieth century expansion surrounding the linear form of the Conservation Area.”

- 1.27. The character and form of the settlement are considered on page 6, noting that:

“The village is relatively large with buildings to the north, south and west of the Conservation Area. This adds depth to the more narrow designation in the centre. The historic core however retains its intimacy and the wider context of the village is not easily read once within the Conservation Area.”

- 1.28. Furthermore, page 7 identifies that:

“Despite its close proximity to Rugby, Clifton upon Dunsmore has a countryside setting. While the approach from the town is more developed in character with housing on the southern side of Rugby Road the northern part is bordered by tree-lined fields. This reinforces the separate identity of the village.”

- 1.29. In my opinion, there is no clear evidence or policy requirement to protect the current morphology of Clifton-upon-Dunsmore. The historic core of the village will remain intact if the Appeal Site were to be developed and it would be seen in the context of the more developed character associated with Rugby Road, whereby tree-lined fields are deemed to be able to reinforce the separate identity of Rugby and Clifton-upon-Dunsmore..

Landscape Sensitivity

- 1.30. At para. 8.55, NW presents a judgement on landscape sensitivity, noting that:

“The landscape sensitivity of the allocated sites is Medium to Low whereas as the landscape sensitivity of the appeal site is Medium which has a bearing on over landscape character effects which are higher for the appeal site than the proposed allocated sites.”

- 1.31. The sensitivity of a site does not define the resultant effects. As set out at para. 6.21 of JB PoE, in accordance with GLVIA (CD5.58, pages 90-93, para. 5.48-5.57), judgements are needed about the size or scale of change, the geographical extent of the area influenced, the extent to which landscape elements will be lost (or gained); and the degree to which aesthetic or perceptual aspects of the landscape will alter.



- 1.32. NW has not undertaken that analysis consistently nor with full transparency for the Appeal Site or the Allocated Sites. The impact of developing the Appeal Site should be considered on its own merits and with a full consideration of how the scheme responds to the local context, the evidence base and the policy requirements, including the benefits of any proposed Green Infrastructure and landscape enhancements.



Appendix 1: Savills response to the Clifton-upon-Dunsmore Neighbourhood Plan ('NP') Regulation 16 consultation – including the landscape analysis of Site 344 (Sunnycroft Farm, Station Road) by Nigel Wakefield

4 November 2025



Clifton upon Dunsmore Neighbourhood Plan
Development Strategy
Town Hall
Evreux Way
Rugby
CV21 2RR

Issued via email only: [REDACTED]

Dear Sir / Madam,

**CLIFTON-UPON-DUNSMORE NEIGHBOURHOOD PLAN – REGULATION 16 CONSULTATION
ARCHDIOCESE OF BIRMINGHAM – LAND OFF STATION ROAD, CLIFTON-UPON-DUNSMORE**

On behalf of the Archdiocese of Birmingham ('AOB'), we are writing to respond to the Clifton-upon-Dunsmore Neighbourhood Plan ('NP') Regulation 16 consultation.

AOB has an interest in two parcels of agricultural land comprising circa 8.9 hectares (22.1 acres) to the north and south of Station Road, Clifton-upon-Dunsmore (the 'Site'). A Site Location Plan has been submitted as Appendix A to these representations.

The Site is considered to be suitable and available for residential development and is free from any significant constraints which would preclude development. The Site is located adjacent to the existing western settlement boundary of Clifton-upon-Dunsmore and is considered to represent a logical and sustainable extension to the existing settlement, which is categorised as a 'Main Rural Settlement' in the adopted Rugby Local Plan. Main Rural Settlements comprise the second of five tiers of the settlement hierarchy behind Rugby. As such, AOB is promoting the Site for allocation in the emerging Rugby Local Plan.

We have set out below our response to the Regulation 16 NP, which we request is taken into account as part of the Examination of the plan.

Consultation Response

Housing Need

It is noted that Rugby Borough Council has provided the Parish Council with an indicative housing requirement figure of 150 dwellings, as set out in paragraph 4.26 of the NP. The NP goes on to state that this requirement is met in full by the sites proposed to be allocated in the emerging Local Plan. It is also noted that the Rugby Borough Local Plan Preferred Option Consultation Document (March 2025) identifies three proposed allocations which would provide a total of 150 dwellings.

The emerging Local Plan is at an early stage of preparation and it is not guaranteed that these proposed allocations will be carried through into the adopted version of the Local Plan. We therefore consider that the NP has been progressed prematurely ahead of the adoption of the emerging Local Plan. Planning Practice Guidance¹ is clear that, whilst Neighbourhood Plans can come forward in advance of emerging Local Plans being adopted, a draft NP must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition e). NPPF paragraph 13 also states that neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies.

¹ Reference ID: 41-009-20190509

[REDACTED]





For the reasons set out above, we consider that it is premature for the NP to be examined and made ahead of the emerging Local Plan being adopted and that the NP Examination should be delayed until the emerging LP is found sound. Therefore, as written we do not consider that the NP accords with basic condition e).

We also wish to highlight that there is an inconsistency within the NP as to the plan period the document is intended to cover. Paragraph 8.1 of the NP states that the plan period covers the period to 2031, however paragraphs 3.3 – 3.5 provide a 'Vision to 2041' and the cover of the NP suggests a plan period running from 2011 – 2041. It is considered that further clarity on this should be provided prior to the NP being examined.

Policy ENV7: Important Views

We object to Policy ENV7 on the basis that the identified important views are not supported by sufficient evidence to warrant their inclusion in the NP. It is not made clear in the NP what evidence has informed the proposed location of views, nor has the criteria for their designation been made clear.

AOB has instructed Node to produce a review of Neighbourhood Plan viewpoints 5, 6 and 7 and their relationship with the Site. This review is provided as Appendix B to these representations.

The review undertaken by Node identifies some discrepancies between the location of some of the viewpoints on the plan and what is illustrated in the photographs contained within the NP. These are detailed in full within Appendix B and we recommend that further review is undertaken to ensure all identified viewpoints correspond correctly to the photographs and descriptions provided.

Node's review also draws the following conclusions on proposed Viewpoints 5, 6 and 7 within the NP:

Viewpoint 5: Rugby Road on the west side of the village. south over the River Avon valley

Viewpoint 5 does not appear to be either on a public right of way or on a public footpath but from a narrow verge adjacent to a busy road. The majority of people either driving or walking on the pavement adjacent to the Rugby Road will not appreciate the view as shown in the photograph shown within the NP. Node has provided a series of viewpoint photographs to provide a panoramic and realistic viewpoint from this location.

We consider that viewpoint 5 should be deleted from the NP on the basis that important views should be taken from locations of high sensitivity receptor groups i.e. people walking on public rights of way for the purpose of recreational enjoyment.

Viewpoint 6: From Station Road, Clifton, toward the River Avon open space

As set out in Node's review, there are discrepancies between the location of the viewpoint arrow and description in the NP and the photograph provided, resulting in a lack of clarity regarding the location of the important view. It appears that the intention is to identify a key view from the Shakespeare's Avon Way Public Right of Way. Node has provided some panoramic viewpoint photographs which demonstrate that the view from viewpoint 6 is impacted by some modern gates which detract from the rural view. Node considers that a more appropriate location for Viewpoint 6 would be further along the Shakespeare's Avon Way Public Right of Way ('Node Viewpoint 5'), as this is a much higher quality view across the River Avon Valley.

Viewpoint 7: From River Avon open space, distant view of Clifton upon Dunsmore village

There are also discrepancies between the photo location point of Viewpoint 7, the photograph provided, and description included in the NP. The photo location appears to be on an informal footpath within proposed open space 049. As many different views exist from the identified important public space, we consider that clarity is required to the exact location with matching panoramic photography. Justification is then required to the importance of the view based on sensitivity and quality.



Planning Practice Guidance² ('PPG') is clear that proportionate, robust evidence should be provided to support the choices made and the approach taken to preparing the NP. As set out in Node's review, we consider that such evidence has not been provided to justify the inclusion of important views as part of the NP. We therefore request that suitable evidence be provided, along with clarification of the discrepancies outlined above, prior to the NP being made.

Policy ENV9: Flood Risk Resilience and Climate Change

We object to Policy ENV9 on the basis that it does not conform with national planning policy and therefore does not meet the requirements of basic condition a).

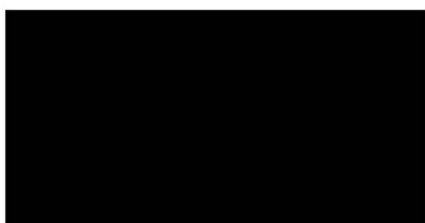
Policy ENV9 states that development proposals on land which is susceptible to flooding from rivers or surface water, as denoted by Figure 13, should demonstrate that no alternative site is available. Whilst we note that this is partially in alignment with the requirement of NPPF paragraphs 174 and 175 for a sequential approach to be taken to ensure that development is steered away from areas at risk of flooding, updates to PPG on this matter were recently published on 17 September 2025. The updated PPG³ states that:

"in applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied" (Savills emphasis).

Therefore, the above clarifications in the PPG confirm that there should be no requirement for applicants to demonstrate that there are no available alternative sites, as long as it can be demonstrated that the development will be safe for its lifetime without increasing flood risk elsewhere. In light of this, we consider that bullet point 1 of part c) of Policy ENV9 should be deleted, to ensure compliance with NPPF paragraph 175 and PPG.

We trust the above is helpful and request to be kept informed with progress on the Neighbourhood Plan.

Yours faithfully



² Reference ID: 41-040-20160211

³ Reference ID: 7-027-20220825

Archdiocese of Birmingham - Land off Station Road, Clifton-upon-Dunsmore



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LANDMARK INFORMATION





CLIENT: Archdiocese of Birmingham

LOCATION: Viewpoints – Clifton upon Dunsmore

PURPOSE: Review of Neighbourhood Plan Viewpoints 5, 6, 7 – Clifton upon Dunsmore

DATE: 3rd November 2025

Introduction

The Archdiocese of Birmingham commissioned Node in October 2025 via Savills to undertake a review of Clifton upon Dunsmore Neighbourhood Plan in order to make landscape representations to the plan, specifically in relation to identified important views.

Node is an urban design, landscape, and heritage practice, which is registered with the Landscape Institute (LI) and the Institute for Historic Building Conservation (IHBC), together with holding ISO9001 (quality management) and ISO14001 (environmental management) accreditation. Our experience includes acting as external advisers for several local authorities and undertaking national research projects. We also work on behalf of landowners, developers and house builders, creating masterplans and undertaking landscape and visual impact assessments across the country. As such, we are well versed in the requirements relating to the assessment of landscape, and visual impacts.

This review has been undertaken by Nigel Wakefield, managing director of Node. Nigel Wakefield is a landscape architect, planner, and urban designer with over 34 years of experience. Nigel is a national Built Environment Expert for Design Council and has regularly represented local authorities and applicants as expert witness in matters relating to design, landscape planning, open space and Green Belt issues.

Landscape Review

A desktop landscape review has been undertaken and has considered the following documents and landscape designation.

- i) Adopted Rugby Local Plan 2011-2031 – Landscape Policies
- ii) Clifton upon Dunsmore Neighbourhood Plan Regulation 16 Draft
- iii) NCA Landscape Character Area 96 Dunsmore and Feldon
- iv) Regional and local character assessments – Warwickshire Landscape Design Guidelines 1993
- v) Landscape designations and public rights of way within the vicinity of Clifton Under Dunsmore



Local Plan Policies

Consideration has been given to both landscape policies and viewpoints identified within the following documents

- i) Adopted Rugby Local Plan 2011-2031 – Landscape Policies
- ii) Clifton upon Dunsmore Neighbourhood Plan Regulation 16 Draft

Adopted Rugby Local Plan 2011-2031 – Landscape Policies

Key landscape policies include

- NE1: Protecting Designated Biodiversity and Geodiversity Assets
- NE2: Strategic Green and Blue Infrastructure
- NE3: Landscape Protection and Enhancement
- SDC2: Landscaping

Clifton upon Dunsmore Neighbourhood Plan 2011-2041

This Neighbourhood Plan which was published in July 2025 covers the whole of the Parish of Clifton upon Dunsmore. It sets out a long-term approach for the development of the Parish and sets out clear development-related policies to realise this. Key policies related to open spaces and views include:

- **POLICY ENV 1: LOCAL GREEN SPACES**

Development proposals that would result in the loss of, or have an adverse effect on, the following Local Green Spaces (details Appendix 4; locations figure 5.1 and 5.2) will not be permitted other than in very special circumstances.

- **POLICY ENV 2: IMPORTANT OPEN SPACES**

Open Space, Sport & Recreation: the following open spaces (shaded yellow in figures 6.1 and 6.2) are of high value for recreation, sport and/or amenity. Development proposals that result in their loss, or have a significant adverse effect on them, will not be supported unless the open space is replaced by at least equivalent provision in an equally suitable location, or unless it can be demonstrated that the open space is no longer required by the community.

- **POLICY ENV 7: IMPORTANT VIEWS**

The following views (map figure 11, details Appendix 5) are important to the setting and character of the village. Development proposals should respect and whenever possible protect them. Development which would have an adverse impact on the identified views will not be supported.



Key figures from the Neighbourhood plan for convenience are attached in an Appendix to this document as follows:

Figure 1: Important open spaces

Figure 2: Sites and features of Natural Environment Significance

Figure 3: Wildlife Corridors

Figure 4: Important Views

In addition to understand the landscape character, landscape designations and historic evolution of the area to the west of Clifton upon Dunsmore, the following figures are also attached as an appendix

Figure 5: National Landscape Character Area 96 – Dunsmore and Feldon

Figure 6: Regional Landscape Character Area – Dunsmore (Warwickshire County Council)

Figure 7: Environmental and heritage designations

Figure 8: Ordnance Survey 1905

This is followed by further figures which compare Neighbourhood Plan viewpoint locations and photographs with additional viewpoints and panoramic photos undertaken as part of a site visit conducted on 30th October 2025 to assess the location and importance of viewpoints as indicated within the Neighbourhood Plan.

Important Views

The Neighbourhood Plan in relation to important views states:

'Consultation during the Neighbourhood Plan's preparation identified a widely held wish to protect the largely rural settings of Clifton upon Dunsmore and Houlton, in particular their visual relationship with the surrounding countryside, including the distinctive landscapes of National Character Areas 95 Northamptonshire Uplands and 96 Dunsmore and Feldon. One of the main ways in which residents expressed this wish was by describing several highly valued views within and around Clifton and Houlton, and toward the surrounding countryside. These consultation findings were supported by the fieldwork for this chapter of the Plan, which although principally aimed at identifying sites of environmental significance also confirmed the sightlines of the suggested views and mapped them (figure 11).'

It goes onto identify 11 important views as set out in the policy below. This representation considers and comments only on viewpoints 5, 6 and 7 and their relationship with land owned by the Archdiocese of Birmingham.



POLICY ENV 7: IMPORTANT VIEWS –

1. Gateway view (south) of Clifton upon Dunsmore village from Newton Road
2. Village view west in the centre of Clifton upon Dunsmore
3. Gateway view (west) into Clifton upon Dunsmore village from Lilbourne Road, with Old Hall Cottage and The Green
4. Distant view south from Newton Road of Clifton upon Dunsmore village and surrounding fields
- 5. From Rugby Road on the west side of the village. south over the River Avon valley**
- 6. From Station Road, Clifton, toward the River Avon open space**
- 7. From River Avon open space, distant view of Clifton upon Dunsmore village**
8. From Hillmorton Locks northeast to Allan's Farm and (on skyline) Clifton upon Dunsmore village
9. From Clifton Recreation Ground, views south and southwest to Bluebell wood, Clifton Brook valley, the Oxford Canal (and Rugby)
- 10 From the entrance to Cow Field, off North Road, Clifton, west across open countryside to the parish boundary
11. From Normandy Hill, Houlton, extensive views north and east over Houlton and the historic site of Rugby Radio Station, including the protected buildings

Landscape character

In order to comment on any views, the starting point is to understand the baseline character of the landscape and its quality and value. The landscape character for Clifton Upon Dunsmore is set out in the following landscape character assessments at national and regional level:

NCA Landscape Character Area 96 Dunsmore and Feldon

Below I set out the key characteristics as set out NCA 96 and Regional Landscape Character Area – Dunsmore with my underlining of characteristics which relate to the area to the west of Clifton upon Dunsmore. A plan is attached Appendix – figure 5.

Key Characteristics

The sense of a predominantly quiet, rural landscape is heightened by its close proximity to several urban areas, with a gently undulating landscape of low hills, heathland plateaux and clay vales separated by the occasional upstanding escarpment.

- The underlying lower Lias clays and Mercia mudstones are similar throughout Dunsmore and Feldon but the Quaternary 'superficial' deposits are what mark the change in character between Dunsmore and Feldon.



- Light sandy soils associated with the west (Dunsmore) supporting mixed farming and some intensive arable with fertile alkaline soils to the east (Feldon) supporting grazed pasture.
- Generally low woodland cover across the area, although there are areas of well-wooded character and ancient woodlands, especially in the north, providing habitats for bluebells, molluscs and fritillary butterflies; these woodlands are linked with landscaped parklands and hedgerow trees.
- Remnants of the formerly extensive Dunsmore Heath, preserving characteristic heathland archaeology, can still be found in woodland clearings. Natural regeneration on sand and gravel soils also occurs along roadside verges, although bracken is often abundant.
- Narrow, meandering river valleys with pollarded willows, streamside alders and patches of scrub supporting dipper, kingfisher, otter and Atlantic stream crayfish.
- Canals, including the Grand Union Canal, and Draycote Reservoir provide important riparian habitats and a well-used recreational resource.
- Mainly large fields, with regular or rectilinear shapes, although some smaller fields also feature. Numerous areas of remnant ridge-and-furrow and earthwork remains of medieval settlements as found at Lower Tysoe, Radwell and Napton on the Hill.
- Predominantly nucleated settlement pattern with a low density of isolated farmsteads and some field barns sitting within a landscape of piecemeal and planned enclosure of the open fields which extended from the villages over large parts of this area. Many villages have recently expanded but the traditional buildings, constructed of red brick or Lias limestone, still retain their blue brick or ironstone details.
- The busy roads and large industrial units on the outskirts of the main settlements of Leamington Spa, Coventry and Rugby exert an urban influence on the surrounding area.
- Limestone quarrying for the cement industry was formerly a feature in the centre and south of the area, and disused quarries are now prominent elements in the landscape. The rock exposures and spoil heaps are of geological importance, as well as having interesting limestone grassland communities.

Warwickshire Landscape Design Guidelines 1993

Dunsmore Plateau Fringe - Character and qualities

A rather variable, often large-scale framed landscape with a varied topography and characterised by a nucleated pattern of small, often shrunken villages. A plan is attached in Appendix – Figure 6.



Key Characteristics

- An undulating topography of low rounded hills and narrow meandering river valleys
- Large arable fields, often with a poorly defined field pattern
- Pockets of permanent pasture and smaller hedged fields, usually associated with more steeply sloping ground
- A nucleated settlement pattern typically comprising loose clusters of dwellings
- Isolated, brick-built farmsteads

Landscape character to west of Clifton upon Dunsmore

The landscape character to the west of Clifton Upon Dunsmore is characterised by the River Avon and its flood plain, with vegetation and trees along watercourses and to boundaries of agricultural fields. The topography of the land rises from the River Avon at approximately 86m A.O.D to 110m A.O.D on Rugby Road with existing development visible on the skyline. Numerous agricultural and residential buildings are located on this slope which are visible from the Shakespeare Avon Way and informal footpaths.

Landscape designations and public rights of way

In order to understand environmental and heritage designations, consideration has been given to the DEFRA's online resource, Magic: <https://magic.defra.gov.uk> (See Figure 7).

This identifies the following nearby designations: a series of listed buildings within Clifton upon Dunsmore, and Ashlawn Cutting Local Nature Reserve. It does not identify any statutory designations in the vicinity of viewpoints 5, 6 and 7.

Shakespeare's Avon Way, a public right of way runs east – west, crossing the River Avon into Clifton Upon Dunsmore. Viewpoint 6 is located on this public right of way.

Some informal footpaths are located in the designated important open spaces identified within the neighbourhood plan 047, 048 and 049 (See Appendix - figure 1) within which viewpoint 7 appears to be located.

Viewpoint 5 appears to be located on the Rugby Road which has a footway to the south of the road to serve residential properties.



Site Visit

A site visit was undertaken on 30th October 2025 to undertake a review of landscape character, and key viewpoints identified in Clifton upon Dunsmore Neighbourhood Plan, focused on viewpoints 5, 6, and 7 which are in the vicinity of land that is owned by the Archdiocese of Birmingham.

Assessment approach and methodology for Viewpoints

Policy EN7 Important Views sets out the purpose that they are important to the setting and character of the village. Development proposals should respect and whenever possible protect them. Development which would have an adverse impact on the identified views will not be supported.

It is not clear on what evidence base important views have been designated and what criteria have been considered to designate these protected views within the Neighbourhood Plan. Reference is made to fieldwork, but it is not clear from the document what process has been followed to reach this conclusion.

Furthermore, it is not clear what constitutes an important view, nor what criteria have been used as to the receptor group that could be affected and the sensitivity of that view. Greater clarity is required on what establishes specific viewpoints as important.

Location and photographs of viewpoints

It appears that some discrepancies exist between the location of some of the viewpoints on the plan and what is illustrated in the photographs.

Viewpoint 5 – Rugby Road on the west side of the village. south over the River Avon valley

This viewpoint does not appear to be either on a public right of way or on a public footpath but from a narrow verge adjacent to a busy road. The majority of people either driving or walking on the pavement adjacent to the Rugby Road will not appreciate the view as shown in the photograph shown within the Neighbourhood Plan.

The photograph taken above a hedge is deceptive in that it gives the impression of just a rural view across the River Avon. To reflect best practice, a wide panoramic photograph using a 50mm lens is required to give a more realistic



impression of the actual view from a location where the majority of people experiencing the view will be walking or driving.

The viewpoint arrow is not located looking south as the description states but north west. The description needs to correspond with the direction of view.

Consideration has been given to this through a site visit with three panoramic photos taken to consider this viewpoint within the Neighbourhood Plan (see Appendix - Figure 10 – illustrative viewpoint locations and panoramas). In order to get a view across the valley from this location, the view should be west not south as stated in the description.

Node Viewpoint 1 – This shows how narrow the verge is on Rugby Road where people are unlikely to be walking. It shows the view consists of an urban fringe location with residential properties, Rugby Road and a mature hedge in the foreground. Medium and long-distance views consist of the River Avon Valley but in the context of the edge of Rugby, within industrial buildings including Rugby Cement Works on the horizon that detract from the view.

Node Viewpoint 2, 3 – These viewpoints show the view from the pavement within the vicinity of viewpoint 5. These viewpoints show rather than a rural view across the River Avon that the view is dominated by Rugby Road, a mature hedge and views of Rugby Cement Works.

On the basis that important views should be taken from locations of high sensitivity receptor groups i.e. people walking on public rights of way for the purpose of recreational enjoyment and be of high quality, then I would recommend that viewpoint 5 is not included as shown within the Neighbourhood Plan.

Viewpoint 6 - From Station Road, Clifton, toward the River Avon open space

This viewpoint does appear to be on Shakespeare's Avon Way PRoW. However, discrepancies exist between the photo location arrow, its description and the photograph included within the Neighbourhood Plan. The photo location and description say from Station Road and mark the arrow halfway down Station Road, but the photograph is taken at the end of Station Road where it turns into a purely pedestrian footpath (see Appendix – figure 4).

This results in ambiguity to where the viewpoint location is intended to be from: the photograph location or the arrow location? Consideration has been given to this through a site visit with three additional panoramic photos being taken to consider Viewpoint 6 within the Neighbourhood Plan (See Appendix - Figure 10 – illustrative viewpoint locations and panoramas).



Node Viewpoint 4 – From the bottom of Station Road looking north west.

This viewpoint is taken in a similar location to where the photograph of viewpoint 6 within the Neighbourhood Plan is taken. It is however taken as a panorama which shows the view from this location is impacted upon by some modern gates to a residential property that detract from the rural view.

Node Viewpoint 5 – From Shakespeare’s Avon Way PRow

This viewpoint is taken a short distance further along the PRow from Viewpoint 4. With the exception of the overhead lines, this is a much higher quality view across the River Avon Valley. It is suggested that Viewpoint 6 in the Neighbourhood Plan should be shown in this location as it is a high sensitivity receptor with currently few detracting features to the view, which should be protected.

Node Viewpoint 6 – From halfway along Station Road

This viewpoint was taken, should it be the case that the intention of Neighbourhood Plan viewpoint 6 relates to the location above than the photograph. This panoramic photograph looking north west down Station Road shows a rural road with mature hedges either side and a residential property on the right-hand side. From this viewpoint one does not benefit from an appreciation of the River Avon Valley, as it is screened by mature trees and hedgerows.

If the intention is to protect important views of this river corridor and setting of Clifton upon Dunsmore, then as outlined above, it is suggested that Node viewpoint 5 would be a more appropriate location for viewpoint 6 within the Neighbourhood Plan.

Viewpoint 7. From River Avon open space, distant view of Clifton upon Dunsmore village

Again, discrepancies exist between photo location point of Viewpoint 7, the photograph provided, and description included. The photo location appears to be on an informal footpath with 049 important open space (see Appendix figures 1, 7).

The description says view from River Avon open space, distance view of Clifton upon Dunsmore (a text error means that it also refers to Hillmorton Locks, which relates to viewpoint 8). The photograph appears to be taken from a location looking over the River Avon towards open countryside.



The photograph location appears to be set back from the River Avon on an informal path within the important open space. A lack of clarity exists to where this viewpoint location is from.

Consideration has been given to this through a site visit with two additional panoramic photos taken to consider Viewpoint 7 within the Neighbourhood Plan (see Appendix -Figure 10 – illustrative viewpoint locations and panoramas – viewpoints 7, 8).

Node Viewpoint 7 – From Shakespeare’s Avon Way PRow looking south east

This view shows a panorama from Shakespeare’s Avon Way PRow looking south east towards Clifton upon Dunsmore. The tarmac road/ walkway detracts from the rural character of the landscape and looks quite formal. Clifton upon Dunsmore is visible on the skyline and woodland copses help screen some of the longer distance views back to the village.

Node Viewpoint 8 – From Important public open space identified in Neighbourhood Plan adjacent to River Avon

This view is adjacent to the River Avon looking south back to Clifton upon Dunsmore. Middle distance views are of Clifton Mill Farm and a wooded valley side to Clifton upon Dunsmore.

As many different views exist from the identified important public space, clarity is required to the exact location with matching panoramic photography. Justification is then required to the importance of the view based on sensitivity and quality.

Potential Mitigation

It is suggested that the Neighbourhood Plan could acknowledge concerns about views across the River Avon valley and the rural setting of Clifton upon Dunsmore, which could be mitigated through careful design including the following:

- 1) Providing viewing corridors across potential development sites that allow longer distance views of the river Avon Valley to be maintained
- 2) Provision of offset of development and mitigation from both the River Avon and close to Clifton Upon Dunsmore to allow landscape character and views to be maintained with development screened by mitigation planting



Conclusion

The following provides a brief summary of the conclusions and representations to be made to Clifton upon Dunsmore Neighbourhood Plan from a landscape perspective with specific reference to viewpoints 5, 6 & 7:

- 1) Clarity on criteria for identifying an important view
- 2) Discrepancies between viewpoint location plan, descriptions and photographs
- 3) Deletion of viewpoint 5 as it is not an important view
- 4) Relocation of viewpoint 6 to a location along the Shakespeare's Avon Way which is a higher quality view
- 5) Clarity on the preferred location for viewpoint 7