**Ryton on Dunsmore Neighbourhood Plan**

**Presubmission Consultation Responses**

<table>
<thead>
<tr>
<th>Number</th>
<th>Chapter/Section</th>
<th>Policy Number</th>
<th>Respondent</th>
<th>Comment</th>
<th>Response</th>
<th>Amendment</th>
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<tr>
<td>1</td>
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<td></td>
<td>Warwickshire County Council</td>
<td>Ryton on Dunsmore Draft Neighbourhood Plan - biodiversity audit I am writing in response to the Ryton-on-Dunsmore draft neighbourhood plan consultation, to make you aware of the biodiversity reports we have produced for local parish councils in support of their neighbourhood plans. We did an ecological report just last year for Brinklow parish council for their neighbourhood plan. The report includes local wildlife site descriptions, potential sites and habitat maps with commentary. The Habitat Biodiversity Audit is a partnership of all the local planning authorities for Warwickshire, Coventry and Solihull and includes Rugby Borough Council, Warwickshire County Council and Warwickshire Wildlife Trust. If you are interested and would like to know more about what you can provide please let me know. Yours sincerely Chris Talbot Biodiversity Manager Habitat Biodiversity Audit Partnership Warwickshire Wildlife Trust c/o Ecology, Historic</td>
<td>Noted. We have gathered this information through contacts at Rugby Borough Council and through other sources. It is too late in the process now to revisit the work undertaken but your interest is appreciated.</td>
<td>None</td>
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<td>Environment &amp; Landscape Warwickshire County Council Warwick Tel. 01926 412197 Habitat Biodiversity Audit</td>
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<td>2</td>
<td>The Coal Authority</td>
<td>Thank you for the notification of the 7 January 2019 consulting The Coal Authority on the above NDP.</td>
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The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.

As you will be aware the Neighbourhood Plan area lies within the current defined deep coalfield. However the Neighbourhood Plan area does not contain any surface coal resources or recorded risks from past coal mining activity at shallow depth. On this basis the Coal Authority has no specific comments to make on the Ryton on Dunsmore Neighbourhood Plan.

In the spirit of ensuring efficiency of resources and proportionality it will not be necessary for you to provide The Coal Authority with any future drafts or updates to the emerging Neighbourhood Plan. This | Noted | None |
| 3 | Historic England | RYTON-ON-DUNSMORE NEIGHBOURHOOD PLAN - REGULATION 14 CONSULTATION  
Thank you for the invitation to comment on the above Neighbourhood Plan.  
Historic England is generally supportive of both the content of the document and the vision and objectives set out in it. The emphasis on the conservation of local distinctiveness and variations in local character through good design including through adherence to clear Design Principles evidenced through Design and Access Statements and the protection of locally significant green space, locally valued buildings, historic farmsteads and landscape character including ridge and furrow and key views is to be applauded.  
Historic England does, however, have serious concerns with reference to the proposed | Noted. Thank you for this comment. | Change to be made as |
housing allocation for land at "the Legion" (which is not identified further but which we take to be the statutorily listed "Ryton House") which is set within a grade II Registered Park and Garden. Historic England cannot at this point support the allocation of this site in the Neighbourhood Plan for a housing development of ten dwellings. This would be to accept the principle of development before it has been made clear what the actual impact of any development would be on the listed building and its setting and on the Registered Park and Garden more generally and we are not convinced at this stage that no harm would be caused to these designated heritage assets. It should be noted in this context that the National Planning Policy Framework (NPPF) paragraph 194 requires that "Any harm to, or loss of, the significance of a designated heritage asset......should require clear and convincing justification". Whilst not wishing to lodge a formal objection at this stage we would very much welcome an early detailed discussion about the proposed allocation with both the neighbourhood plan team and the local planning authority in order that these issues can be addressed.

To these ends our Landscape Architect Jo McAllister will be happy to be contacted to progress this further at this address (or can be reached on 07769 886 508). I am also copying Nick Molyneux our Principal...
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<th>Page</th>
<th>BE2 b</th>
<th>Bubbenhall Parish Council</th>
<th>Inspector of Historic Buildings and Richard Holt of Rugby Council into this response. In conclusion, and notwithstanding our concerns, overall the plan reads as a well considered and concise document which we consider takes a suitably proportionate approach to the historic environment of the Parish. I hope you find these comments helpful and hope that further discussions will be productive. Yours sincerely, Peter Boland Historic Places Advisor</th>
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<td>4</td>
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<td>Thank you for taking the trouble to comment.</td>
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**Ryton on Dunsmore Draft Neighbourhood Plan**

Bubbenhall Parish Council welcomes this opportunity to contribute to the consultation on the draft Neighbourhood Plan. The parish council endorses the concern, expressed both in the Plan and in the responses to the questionnaire by Ryton residents, over the build-up of traffic on the A445, particularly at the junction with the A423. The queue to the south extends as far as the entrance to Bubbenhall village at rush hour, a situation that is bound to increase with the additional houses to be built on the site of the Sky Blue Connexion. It is also our view that the situation is exacerbated by the traffic calming measures on Leamington Road. One important issue that is not addressed in your draft plan is the proposal in Warwickshire County Council's draft Minerals Plan to develop sand and gravel quarrying at Coney Grey Farm, situated off the A423. This will

In relation to the sand and gravel quarrying at Coney Grey Farm, this is outside of the scope of the Neighbourhood Plan. Minerals and waste related development is excluded from the scope of

None
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<td>5</td>
<td>Resident 1</td>
<td>Dear Lindsey I have been reading through the Parish Plan and wish to comment on an item listed. On page 42 protection of local green space I see a number of areas marked on the map that are protected from development but the Main open Green Space in the Village being Recreation ground along Fetherston Crescent is not on the list where the statement says - POLICY ENV 1: PROTECTION OF LOCAL GREEN SPACE - Development proposals that would result in the loss of, or have an adverse effect on, the following Local Green Spaces (details above; map Figure 9) will not be permitted other than in exceptional circumstances. Yet at the moment it is listed on page 46 under important open spaces item 1.4 as follows.</td>
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<td>ENV1</td>
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<td>ENV3</td>
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<td>Thank you for this comment. The designations of Local Green Space were determined following detailed assessments of all open space in the parish. The sites selected were those deemed to be the most special locally. The Featherstone Recreation Ground did not score highly enough to be proposed as a Local Green Space, but as you say, has a degree of protection from development as a result of its designation as an Open Space Sports and Recreation site. It has additional protection as it is.</td>
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result in hourly hgv movements along the A423 to the roundabout with the A445 where the lorries turn right towards the processing plant at Bubbenhall. This will contravene policy BE2 b of your plan, which states that any new development should 'not generate unacceptable levels of traffic movement' and a statement on p. 67 that 'commercial development should only be allowed if it could be shown not to increase heavy goods traffic'. We urge you to oppose this unwelcome development that will have an impact on both our communities. Many thanks Doug Evans Bubbenhall Parish Clerk and RFO policies that NPs can include.
under the clause -

POLICY ENV 3: IMPORTANT OPEN SPACES -

Development proposals that would lead to
the loss of, or harm to, the following
important open spaces will not be supported
unless equivalent or better provision in an
equally convenient location is provided by
the developer. Proposals to enhance the
amenity of important open spaces will be
supported.

(1.4 Fetherston Crescent recreation ground,
play area, etc. (Outdoor sports facilities /
Provision for children and young people)

I do believe that after reading the terms of
the transfer of the Recreation ground to the
Village listed with the land registry May 2001
under Document number WK393744 it will
be seen that any part of the area marked on
the map cannot be developed apart from a
building for recreation purposes.

With this in mind I do believe that item 1.4
above should now be removed from page 46
and be placed under the heading as
follows on page 42 where it says

POLICY ENV 1: PROTECTION OF LOCAL GREEN
SPACE – Development proposals that would
result in the loss of, or have an adverse effect
on, the following Local Green Spaces (details
above; map Figure 9) will not be permitted
other than in exceptional circumstances.

To ensure it is given more protection it
deserves from any developer who may think
the playing field or part of it could be

owned by the Parish Council and
is subject to a covenant
preventing residential
development.
relocated somewhere else. I trust this will be given serious consideration by the committee in the interest of all Ryton residents that daily enjoy using this central green open space. One other thing I don’t really understand is why the following statement (below in red type) on page 46 appears to be listed in both sections (2. Additional important open spaces 2.1 Ryton community orchard (Amenity green space / Community gardens and allotments) 2.2 Parish burial ground and remainder of historic churchyard (Cemeteries, disused churchyards and burial ground) These two sites are listed in policy Env 3 so that they are afforded additional protection should the proposed designation as a Local Green Space be rejected at examination.

<p>| 6 | Resident 1 | Dear Lindsay Could you please include in my comments to the parish plan committee an additional observation which I feel has been overlooked in the plan and I forgot to mention in my previous email but feel should be included in the list of protected sites from housing development that is the field that is used for village residents Allotments commonly known as the pony field on the A45, this particular piece of land I feel has as much importance to be protected as the those already in the first list Noted. The site did not score highly enough to warrant designation as a Local Green Space, however it is owned by the Parish Council and we will add it to the list of community facilities to afford additional protection. Change to be made as indicated. |
| 7 | Network Rail | Network Rail has no comments. From Diane Clarke Town Planning Technician LNW Network Rail Town <a href="mailto:PlanningLNW@networkrail.co.uk">PlanningLNW@networkrail.co.uk</a> Noted None |</p>
<table>
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<th>National Grid</th>
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National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

**About National Grid**

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK’s gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

**Specific Comments**

An assessment has been carried out with respect to National Grid’s electricity and gas...
transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High-Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area. Key resources / contacts National Grid has provided information in relation to electricity and transmission assets via the following internet link: http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ STER.LAQA Gables House Kenilworth Road Leamington Spa Warwickshire CV32 6JX United Kingdom Tel +44 (0) 1926 439 000 woodplc.com Wood Environment & Infrastructure Solutions UK Limited Registered office: Booths Park, Chelford Road, Knutsford, Cheshire WA 16 8QZ Registered in England. No. 2190074 SREGISTE LLOYD UKAS MANAGEMENT SYSTEMS ISO 9001 - 150 14001 OHSAS 18001 001 Electricity distribution The electricity distribution operator in Rugby.
Borough Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk.

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Lucy Bartley Consultant Town Planner
Spencer Jefferies Development Liaison Officer, National Grid
n.arid@woodplc.com
box.landandacquisitions@nationalarid.com
Wood E&I Solutions UK Ltd Gables House Kenilworth Road Leamington Spa Warwickshire CV32 6JX
National Grid House Warwick Technology Park Gallows Hill Warwick CV34 6DA

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

Yours faithfully
[via email] Lucy Bartley Consultant Town Planner
cc. Spencer Jefferies, National Grid

<p>| 9 | Baginton Parish Council | Your Draft Neighbourhood Plan was discussed at the Baginton Parish Council meeting held on 7th February. We have no | Thank you for taking the trouble to read the NP. | None |</p>
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<th>No.</th>
<th>From</th>
<th>Details</th>
<th>Response</th>
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<tr>
<td>10</td>
<td>Highways England</td>
<td>Thank you for forwarding me details of the above Neighbourhood Plan received on 16 January 2019. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner for national economic growth. The SRN in closest proximity to the Neighbourhood Plan area comprises the A45, which passes through the parish, and the A46. The residential allocation at Leamington Road, as proposed in the draft Neighbourhood Plan, accords with the emerging Rugby Local Plan. However, Policy H1 (<em>Residential Site Allocations</em>) also allows for development of around 10 dwellings on the former British Legion site north of Leamington Road. It is noted that this parcel of land is not included within the emerging Rugby Local Plan and is bound to the north by the A45, with Ryton Roundabout located to the north-eastern corner. Although the...</td>
<td>Noted.</td>
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<tr>
<td></td>
<td>H1</td>
<td>None</td>
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proposal is small, it should be noted that development at any scale on this site has the potential to result in boundary issues given the close proximity to the SRN. Furthermore, it is noted that the reserve site proposed at Lambs' Field does not appear to be included within the emerging Rugby Local Plan, albeit this is further from the A45 and would not be expected to present any boundary-related impacts. We would welcome further information in regard to these two sites should planning applications come forward. Given the close proximity of the former British Legion site to the A45 in particular it is recommended that Highways England is approached for pre-application advice prior to any planning application being submitted. Additionally, there appears to be a currently disused access into the site from the A45; early discussions should be held with Highways England with regards to this access should this site come forward for development. We support the various commitments made by the local community to the sustainable development principles contained within the Plan but have no further comments to make on its content based on the level of detail available at this time. Please do not hesitate to contact me if you require any more information or clarification. Yours sincerely, Ewang
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<th>11</th>
<th>Wolston Parish Council</th>
<th>Wolston Parish Council wish to thank you for inviting us to comment on your Neighbourhood Development Plan. Councillors found the NDP interesting to read and comprehensive. Councillors do have a couple of comments they wish to make, one being in relation to transport. They noted that there is no bus service between Ryton and Wolston, and concerns were raised about the impact the lack of community transport may have on residents who use services in Wolston - including the Doctors Surgery. There will a particular impact on the vulnerable and elderly. Does the Ryton minibus scheme still operate? And if not is there a reason it is no longer functional? Councillors are also aware of the issues surrounding the roundabout on the A45 as you come out of Wolston, and the lack of visibility. It is recognised that improvements would be aspirational, but wondered if this issue has been considered. Thank you again and congratulations on the Neighbourhood Plan. Kind Regards Maria Meede Clerk and Responsible Finance Officer Wolston Parish Council</th>
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<td>12</td>
<td>Sport</td>
<td>Thank you for consulting Sport England on</td>
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the draft Ryton-on-Dunsmore Neighbourhood Plan, Sport England would like to make the following comments in relation to Policy H1: Residential Site Allocations, Policy H9: Biodiversity Protection in New Development and Policy CF1: The retention of community facilities and amenities.

**Policy H1: Residential Site Allocations**
The Policy makes provision for around 75 new dwellings at the site of Coventry City’s training ground in line with Rugby Borough Council’s submitted Local Plan policy DS3: Residential allocations.

Policy H1 sets out that development of the site is subject to a number of criterion’s one of which is for adequate replacement pitch provision is made in line with national policy. Sport England considers that the criteria should be amended to ensure that replacement provision extends beyond the playing pitches to capture the ancillary provision such as the training facility and car parking. This would ensure that the policy is compliant with national planning policy and Sport England’s Playing Field Policy. The suggested alteration would also ensure that the policy is aligned to Rugby Borough Council’s proposed modification to policy DS3: Residential allocations “Implementation of site allocations DS3.7 can only occur when adequate replacement of the pitch and training facility has been made to the satisfaction of Rugby Borough Council and Sport England and in accordance with national planning policy’.”

**Agreed.**

Amend to say ‘development will only occur when adequate replacement of the pitch and training facility has been made to the satisfaction of Rugby Borough Council and Sport England and in accordance with national planning policy’.

**Change to be made as indicated.**
| CF1 | CF1 | satisfaction of Rugby Borough Council and Sport England and in accordance with national planning policy.”
Policy H9: Biodiversity Protection in New Development
It is viewed that the Policy H9 criteria c) restrictions on the use of sport facility lighting is unduly restrictive as it fails to take account of the location of sites, surrounding characteristics, proposed lighting and potential impact on ecology. Therefore the policy should be reworded that proposals for sports facility lighting should be supported, where necessary, by a detailed light impact assessment alongside an ecological assessment to inform the effective mitigation of lighting impacts on bats.
Policy CF1; The retention of community facilities and amenities
National Planning Policy Framework paragraph 97 sets out the circumstances as to when existing playing fields and recreational buildings can be built upon. It is therefore viewed that Policy CF1 with the inclusion of recreational buildings such as the Connexion Sports Centre does not comply with national planning policy nor is would it be in general conformity with the Local Plan Policy HS4 (proposed modification MM96). It is recommended that the policy removes reference to playing fields and sporting facilities which could be covered within a separate policy, if deemed necessary, | This matter would be dealt with at planning application stage with reference to RBC policies. | None |
| None | None | The part of the site to which this comment refers is outside of the development site. The Connexion Sports Centre is to be retained and is referenced in NP policy CF1 as a sporting facility. | None |
consistent with national policy,
Should you have any queries regarding the
above comments please do not hesitate in
contacting me.
Regards
Raj
Rajvir Bahey Planning Manager
M: 07879488344 E: Rajvir.
Bahey@sportengland.org
Sport England

13  Resident 2  Thank you for the opportunity to comment
on the Draft Neighbourhood Plan. We can
see a lot of time and effort has gone into
producing the comprehensive plan, much of
which is common sense that needs to be put
into practice by developers and the Council.
My husband and I have discussed the plan
and I'm responding on behalf of us both. Our
comments are based on our experiences
both prior to moving to the Midlands and
since our move. We were unable to attend
the village meeting about the plan so forgive
me for writing our thoughts down. You can
skip the first few paragraphs if you wish!
We moved from Swindon for employment
reasons. At that time development within the
Swindon area had been going for some time,
and continued to do so after we'd left. It still
continues, although it seems the focus is
even more on house-building and out of
town shopping facilities to service the new
expansions, rather than business. This of

Thank you for these comments. None
course isn't so much of a problem due to the M4 corridor and rail network, which allows for ease of commuting. I still have family and friends located in and around Swindon and have observed that, as a result of the planning and development processes, villages around Swindon continue to lose their uniqueness and identities. There is very little green space between some villages, so it seems you are just moving within the Swindon area. Greenbelt and agricultural land is being swallowed up by developments which give scant regard for the environment and wildlife needs. Mature trees and hedges are removed, as they are in most 'developments' these days, because it's easier and cheaper for the developers to cut them down in order to pack in as many houses as possible and then replant young and frankly useless replacements that will offer nothing of benefit to wildlife for decades. The new homes are built with very little space between them and their neighbours, roads are barely a car's width and allocated parking is lacking (similar to Warwick Gates!). There is very little storage for 'stuff and refuse bins at the 'affordable homes, which doesn't help the overall look of the developments. The out of town shopping centres have ensured the demise of the main Swindon town centre, with little investment. Parking is difficult and expensive, and what was once an innovative and modern centre...
that had one of the first covered shopping malls in the country, now lacks a good range of high street stores and virtually no independent business. We are already seeing the expansion around Coventry with the business park developments Gateway (1 and proposed 2) and development taking place around Tollbar. Baginton is being swallowed up by Gateway 1, Bubbenhall is threatened by the proposed Gateway 2. The isolated green spaces left between these developments could well be vulnerable to housing development. Whilst more housing is inevitable given the free pass the Government has handed to builders to, who in reality are in it to make money and not for any altruistic reasons (how many truly “affordable' homes have you seen built in Rugby recently?), villages need to fight to keep their identities, to avoid the sprawl that has happened in and around other villages in the country. We have lived in Ryton for 18 years, and love our home and the village. We are lucky to have a village shop, school, pubs, community bus, community orchard and green spaces, postal facilities, play areas, and so many lovely walks all in within walking distance - a rare thing these days. We love that there are so many village activities, and a strong community spirit - how lovely that people say 'good morning' etc, when you pass in the

| None | None | Noted. The purpose of the Neighbourhood Plan is to make sure that new housing meets a local need and reflects local circumstances. | None |
street. We love that there are (or were) a number wild spaces and lots of trees around us that have enabled us to see wildlife we never thought we'd see. There are downsides of course - increased through-traffic due to increased gravel extraction, Prologis, and expansion of housing developments, lack of Police presence in the area which allows for fairly regular thefts, the poor staff at the Co-op having regularly to deal thieves and waiting for days before the Police turn up, anti-social behaviour - but this isn't unique to Ryton, but needs to be considered when looking after the needs of the village. Anyway, enough of this - I'd best press on before you fall asleep!

**Limits to Development**

"*Generally, open areas of countryside - agricultural land, meadows, woodland, and other greenfield land (except residential land) - have been excluded;*" What does "generally" mean? Developers can and have purchased such areas, have and are banking it. What is being done to protect these areas?

"*Isolated sporadic development that is detached from the main built-up area is excluded*" What is isolated sporadic development? If this type of development takes place, could it then be argued that precedence for development has taken place.

It means that in drawing up the Limits to Development, account has been taken of the built-up area, and most of the open spaces are outside of that line. Open spaces within the Limits to development are subject to other Plan policies which seek to protect the most special areas from inappropriate development.

This refers to mainly isolated development in the countryside that relates more to a countryside setting than the built-up area of Ryton on Dunsmore. This refers to existing dwellings, not new.
and therefore more development can be allowed? It's important to ensure that the limits to development are not nibbled away at around Ryton.

**Building Design Principles**

There are Restricted Covenants, which relate to the principles listed, currently in place for existing properties - these are not currently being adhered to. Will the covenants be more strictly upheld once the Plan is in place? It is imperative to retain trees, hedges and streams in order to ensure wildlife corridors are preserved. In addition, trees and hedges help reduce air and noise pollution from the roads that surround the village. Ryton is a village and should retain the feeling of light and space, so existing and new trees and hedges should be insisted upon as an integral part of any development. Three storey houses nor will multi-storey flats will it in or enhance this village or area. They are not consistent with the traditional properties in this village or area - will the word "unlikely" be changed to reflect this they are not acceptable?

Development. Development outside the Limits to Development will be carefully controlled in line with Rugby and national planning policies.

Once the Neighbourhood Plan is 'made it becomes part of Rugby's development Plan and carries the same legal status as the Local Plan. Thereafter, it will be up to Rugby Borough Council to apply the Neighbourhood Plan when determining planning applications.

It is not good planning policy to be overly prescriptive, so the use of the word 'unlikely' needs to remain, but gives a strong steer to Rugby Borough Council as to how to determine an application. It will be up to the developer to present a strong argument to counter this policy if they wish to do so.

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<td>It is not good planning policy to be overly prescriptive, so the use of the word ‘unlikely’ needs to remain, but gives a strong steer to Rugby Borough Council as to how to determine an application. It will be up to the developer to present a strong argument to counter this policy if they wish to do so.</td>
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None.

None.

None.
Development should be in keeping with the village, enhance it, allow people to have space in and around their homes, not cause an eyesore by not allowing space for cars, bins and storage - will it be insisted upon that Developers show these requirements are met in the first set of plans? Environmentally friendly development should be encouraged and planting of additional trees, shrubs, etc, soft land-scaping should be insisted upon-again, will it be insisted that Developers not compromise on this as part of any negotiating process?

**Design and Access**

Whilst new developments should be integrated, if you don’t have cul-de-sac development, you could end up with open sprawl with little more of a big 'estate' feel that even new trees, shrubs and hedges would struggle to soften? Shared, communal and public areas should be designed with wildlife and people in mind. What is being put in place to allow public rights of access/footpaths to remain around the village? I see that maintenance is proposed but will future developments threaten existing footpaths? Isn't there a footpath that ran across part of the British Legion site, across what was an area of mature (oak) trees that were felled (again without planning?) and the area left derelict, that comes out behind the village hall? What has

| The policy on off-road parking and external storage requires this to be incorporated. |
| If the initial application is outline, then this level of detail will not be provided, but will need to be shown before a detailed application is determined. |
| This is a matter for RBC. |
| Policy T2 promotes new and improved footpaths and cycleways whilst Community Actions T1 and T2 address issues related to the maintenance of footpaths and increasing cycle lanes. |
| None |
| None |
| None |
| None |
happened to that? Last time I was there it felt like it was being deliberately made difficult to access.

**Residential Site Allocations**

Site 2 - How are 75 houses going to be built on Site 1, allowing parking for multiple vehicles, bin storage, etc, and all the things mentioned in the Building Design Principles? Do the builders' plans show how they intend to do this? How will traffic generated by this and the Royal British Legion site be catered for, given the hold ups now caused by the traffic calming outside proposed Site 1? What protections are in place to ensure the mature trees and hedging, that which survived the destruction by Coventry City FC a few years ago, will not be cut down between now and when the development is due to start, and when it starts?

Site 2 - there hasn't been anything sympathetic carried out by the developers on this site to-date, so what is being put in place to prevent them from illegally cutting down more trees, hedges and dredging/filling the ponds. The house has been left to fall into a derelict state, the listed staircase stolen - the Listed status hasn't protected it. Have protections been put in place for the bats and other wildlife on the site? What reparations are the developers being asked to make to replace the mature trees they've cut down without planning so far? We are now experiencing increased noise and air pollution.

| The proposed number of dwellings on site 1 is determined through the Local Plan. The Neighbourhood Plan. Through the policies which are proposed, seeks to minimise the impact of this development on the Parish. |
| It is beyond the scope of the Neighbourhood Plan to affect what the owners do between now and the development starting. |
| The allocation will only be approved if the proposed development is sensitive to the heritage asset. The wording in the policy H1 will be strengthened to reinforce this. |
| None |
| None |
| None. |
pollution as a result of this. Birdlife and bats and most likely mammals in the area have been affected. What is being done to ensure no further trees are going to be cut down as it is extremely important that the barrier between Ryton village and the A45 is maintained, and the wildlife corridor preserved.

Windfall Sites Again, as in 'isolated sporadic development' how can you ensure that windfall sites don't lead to further development because precedence has been set? There are very few spaces left in Ryton that would allow for this without impacting as indicated in a)-g). At the very least more green space would disappear around us.

Residential Parking
Off-Road Parking - Many families have older 'children' who now have vehicles of their own and so it is not unusual for there to be 2-3 vehicles per house. Cars are being parked partly on pavements, as well as front lawns and the 'footpath' areas that are not part of the house's boundary but provided because there is no formal pavement. This is causing obstruction and isn't of course good to look at, with mud and gravel being spread.

Garages have been converted to additional rooms and this hasn't helped - Will existing restricted covenants be used to address this too?

Building for Biodiversity
I really do hope the biodiversity protections

<table>
<thead>
<tr>
<th>The very fact that there are few spaces left in Ryton to develop strengthens the policy and helps guard against the concerns that you have raised.</th>
<th>None.</th>
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<tbody>
<tr>
<td>Policy H6 introduces a restrictive covenant to prevent garage conversions to dwellings.</td>
<td>None</td>
</tr>
<tr>
<td>Noted</td>
<td>None</td>
</tr>
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mentioned are adhered to. It’s a shame they’re not being adhered to now. All hedges and trees are of value environmentally. They may not look pretty but they will sustain wildlife of some sort. The practice of gravelling, tarmacking or bricking over front lawns to provide extra parking or easy maintenance should be prevented. I’ve noticed that Sand Martins which used to nest on some of the Bellway estate houses, are being discouraged by the use of plastic discs under the eaves to stop the mud for the nests from sticking. Things like this must be prevented from happening. Run off from buildings, roads and use of herbicides - as in the case of the person who keeps using herbicide in the conservation area in the middle of the Bellway estate, is devastating to existing water habitat. Where as there used to be a healthy population of toads, frogs and newts, a number of years ago they all but disappeared.

Local Green Space
I’m surprised these didn’t score higher. Particularly Steetly Meadows. They say ‘Beauty’ is in the eye of the beholder. Either way they are all important for wildlife diversity, and the health and wellbeing of the inhabitants of Ryton. In terms of The Dell, there’s probably more wildlife there than people think, as humans can’t get access to it and disturb things. It would be good to preserve it as a green space and make it

Noted – but Steetly Meadow made it onto the list so is proposed for a Local Green Space Designation. The scoring system was based on the criteria contained in the National Planning Policy Framework and includes biodiversity but also a range of other elements.
more wildlife friendly and part of the wildlife corridor towards Ryton Pools.

**Important Open Space (& Community Action)**
Holly Drive / Cedar Avenue public open space (Natural and semi-natural open space / Amenity green space) - Yes it is very important even though many people seem to consider it an eyesore. It's not an Amenity space, like the play area, but it's wonderful to have and an extremely important wild space for wild life. It's not going to look neat and tidy. It wouldn't looks so bad if people didn't dump rubbish and bags of dog poo in it. Yes it needs some wildlife friendly care and attention - not weedkilling. But even the dead wood, brambles and stinging nettles provide food and habitat for the wild things. If you take time to listen, all the birdsong in the late afternoon comes from this area as the birds settle in the big trees before roosting for the night. The stream/culvert need attention as they're silted up with leaves, rubbish and bags of dog poo. Wildlife in the stream and pond, as well as the Holly Drive side of open space – both inside and outside the fencing - have not been helped by the person who keeps spraying herbicide there (and around boundary fence/hedge lines in the area), and whoever has planted inappropriate trees and shrubs. The poison will have affected all the invertebrates, insects, birds and mammals that live in and around the area,
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<th></th>
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<th>It would be great to get Warwickshire Wildlife Trust involved and I'd happily volunteer. I don't think we should not be doing anything without a conservationist's guidance. This small and much maligned area has – we have personally seen - provided refuge for foxes, young badgers, last year a polecat, grass snake, newts, various small mammals. Until the trees and hedging on the 'development site' were cut down, a wide range of birds visited - sadly the owls and woodpeckers have disappeared, and the bullfinches are less frequent visitors, as are the bats. Chopping down trees, all the brambles and stinging nettles will not do anything except satisfy those residents who think it's a mess. It is not a formal garden! <strong>Broadband infrastructure</strong> Internet and phone connectivity is appalling here and any improvement would be welcomed but will a review of health implications be carried out and opinions asked of the Ryton on Dunsmore community before a decision is made to install a mast? I have nothing else to add that this stage (you'll be pleased to know). Thank you once again for giving us all the opportunity to review the draft plan.</th>
<th>Noted. Any tele-communication masts would have to comply with existing legislation and safety standards.</th>
<th>None</th>
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<td>14</td>
<td>Resident 3</td>
<td>I have read the neighbourhood plan and agree with the policies outlined within it. It is comprehensive piece of work, please pass my congratulations on to all those involved in its preparation.</td>
<td>Noted. Thank you for this comment.</td>
<td>None</td>
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</table>
Thank you for your consultation on the above dated 07 January 2019. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex 1. If you have any queries relating to the advice in this letter please contact me on felicity.bingham@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.
**Legal Requirements**

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the RDNP must meet are as follows:

- These general comments are noted.
(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order. (d) The making of the order contributes to the achievement of sustainable development. (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). () The making of the order does not breach, and is otherwise compatible with, EU obligations.

Revised National Planning Policy Framework
On the 24th July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper. Paragraph 214 of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24th January 2019. Given the date of this

Directors: DJ Gladman BA, KI Gladman MCSP, SAP, JM S Shepherd BSC, Công, MIEE, G K Edwards DipTP, MRTPI
VAT Registration No. 677 6792 63 Registered Address: Gladman House, Alexandria Way, Congleton Business Park, Congleton, Cheshire, (W12 1LB, Registration No.
consultation the submission of the RDNP will occur after this date, and therefore the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2018.

**National Planning Policy Framework and Planning Practice Guidance**

The National Planning Policy Framework (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood
plans should conform to national policy requirements and take account of and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition. The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 13 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development. Paragraph 15 further makes clear that neighbourhood plans should set out a succinct and positive vision for the future of the area. A neighbourhood plan should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth. Paragraph 29 of the Framework makes clear that a neighbourhood plan must be aligned with the strategic needs and priorities of the
wider area and plan positively to support the delivery of sustainable growth opportunities.

**Planning Practice Guidance**
It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements of the wider area as confirmed in an adopted development plan. The Framework requirements have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (S0S) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG, providing clarity on the measures a qualifying body should take to review the contents of a neighbourhood plan where the policy evidence base becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying body's anticipated timescales in this regard.

Further, the PPG makes clear that...
neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded.

**Relationship to Local Plan**
To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. The development plan that covers the Ryton-on-Dunsmore Plan area and the development plan which the RDNP will be tested against is the Rugby Core Strategy (RCS) which was formally adopted by Rugby Borough Council (RBCC) in June 2011. Adopted pre-2012, this plan was prepared in a different era of plan making before the introduction of the Framework. The Council are now working on a Framework compliant Local Plan, which will cover the period between 2011 and 2031. The emerging Local Plan is at an advanced stage of preparation and is currently undergoing Examination in Public. Gladman consider it necessary for the Parish Council to ensure sufficient flexibility is established in the RDNP policies, ensuring that the plan and the area can respond to any changes deemed necessary as a result of the Local Plan Examination process.

**Ryton-on-Dunsmore Neighbourhood Plan**
This section highlights the key issues that

The major modifications to the Examined Local Plan have been published and there is a strong degree of certainty in relation to its adoption.

None
Gladman would like to raise with regards to the content of the RDNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of alternative options that should be explored prior to the Plan being submitted for Independent Examination.

**Policy GD2: Building Design Principles**

Policy GD2 sets out a list 16 design principles that all proposals for residential and commercial development will be expected to adhere to.

Whilst Gladman recognise the importance of high-quality design, planning policies and the documents sitting behind them should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics and the character of the local area. There will not be a ‘one size fits all’ solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles.

Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could act to impact on the viability of proposed residential developments. We suggest that regard should be had to

The form of words ‘will be expected to adhere to’ is not used in the Neighbourhood Plan. The policy actually says ‘... are incorporated as appropriate and relevant’ which affords the degree of flexibility sought.

None.
paragraph 126 of the Framework which states that: "To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and work for creating distinctive places, with a consistent and high quality of standard of design. However their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified".

**Policy H3: Windfall Sites**

Policy H3 states that small residential proposals for less than 5 dwellings will be supported. There is no evidence to suggest why it is considered appropriate to limit windfall development within the plan area to no more than five houses. In restricting development to this maximum level the RDNP is not conforming to the positive approach of the Framework and as such Gladman suggests this element of the policy is deleted.

**Policy ENV1: Protection of Local Green Space**

Policy ENV1 identifies 4 tracts of land as potential Local Green Space designations. The designation of land as Local Green Space (LGS) is a significant policy designation and effectively means that once designated, they provide protection that is comparable to that for Green Belt land. As such, the Parish

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<th>Change to be made as indicated.</th>
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<td>Agreement. The policy will remove the limit of five.</td>
<td>None</td>
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Council should ensure that the proposed designations are capable of meeting the requirements of national policy if they consider it necessary to seek LGS designation. The Framework 2018 is explicit in stating at paragraph 100 that 'Local Green Space designation will not be appropriate for most green areas or open space'. With this in mind, it is imperative that the plan makers can clearly demonstrate that the requirements for LGS designation are met. The designation of LGS should only be used:

- Where the green space is in reasonably close proximity to the community it serves;
- **Where the green area is** demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- **Where the green area concerned** is local in character and is not an extensive tract of land.

Gladman suggest that the Council review the evidence supporting the proposed designations and ensure compliance with all of the above requirements.

**Policy ENV7: Protection of Important Views**

Policy ENV7 identifies 9 views that are considered to be important to the setting and character of the village. The policy states that in order to be supported, development the designations, having completed a thorough and comprehensive assessment process far in excess of most neighbourhood plans, and notes that no specific reasons for the sites not meeting the requirements is proposed in the comments provided.

- Noted. If the developer is able to demonstrate that development can take place without significant harm, then the requirements of

None
proposals must demonstrate that the would not result in significant harms to these identified views. We again submit that new development can often be located in areas without eroding the views considered to be important to the local community and can be appropriately designed to take into consideration the wider landscape features of a surrounding area to provide new vistas and views. In addition, as set out in case law, to be valued, a view would need to have some form of physical attribute. This policy must allow a decision maker to come to a view as to whether particular locations contain physical attributes that would take it out of the ordinary rather than selecting views which may not have any landscape significance and are based solely on community support. Opinions on landscape are highly subjective, therefore, without much more robust evidence to demonstrate why these views and landscape areas are considered special, the policy in its current form will likely lead to inconsistencies in the decision-making process. **Conclusions** Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be the policy will have been met.

| Noted. | None. |
consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the RDNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.
Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.
Yours faithfully,
Megan Pashley m.pashley@gladman.co.uk
Gladman Developments Ltd.

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<tbody>
<tr>
<td>1</td>
<td>9 high street</td>
<td>Thank you for your letter about the local listing of properties that are heritage assets. After careful consideration, I do not want my property put on to the local list, so please remove it.</td>
<td>Agreed</td>
<td>Change to be made as indicated.</td>
</tr>
<tr>
<td>2</td>
<td>7 High Street</td>
<td>I do not want my property to be included on the listed buildings list. I would like it to be removed from the list. Thankyou.</td>
<td>Agreed</td>
<td>Change to be made as indicated.</td>
</tr>
<tr>
<td>3</td>
<td>Twin cottage 15-17 High Street</td>
<td>We are in receipt of your undated letter regarding the local list. We bought Twin Cottage in September 2005, and at that time the cottage was in a very poor state of repair. Poor quality replacement wooden windows all needed replacing, there were many cracks in the exterior beams and damp areas in the exterior cladding affecting interior walls. Substantial interior damp issues also</td>
<td>Agreed</td>
<td>Change to be made as indicated.</td>
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became apparent caused by the tarmac yard at the rear of the Blacksmiths Arms having been laid above our damp proof course on party walls. Over the years all of these problems have been rectified at substantial cost, replacement upvc windows have been fitted, exterior cladding and beams repaired or replaced. The interior party wall all along the side of the Blacksmiths Arms had to be taken out and re-plastered. Interior walls have been removed and we have also had a single storey lounge extension built at the rear of the property. If the property had been listed most of these repairs and enhancements would not have been allowed or would have been so expensive that they would not have been viable to carry out and the property would have deteriorated further. A large part of the property is therefore not original and there is also an extension at the front which we believe was built about 30 years ago, again not original. We see no advantage of listing this property, it is also not visible from the road so no-one can see it anyway. Therefore we do not want the property to be added to the list. Please confirm that Twin Cottage has been removed from the list. Thank you for your help in this matter.
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<tr>
<th>5</th>
<th><strong>RAF hut</strong></th>
<th>neighbourhood plan. I formally request that the WW2 RAF hut is not included as an Heritage Asset</th>
<th>indicated.</th>
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<tr>
<td><strong>17 Church Road</strong></td>
<td>With reference to your letter regarding local listings, I am providing the information requested regarding my property. Address 17 Church Road Approx date of original build is 1870 Extended in the 1950's Extended again in 1981 &amp; a pitch roof turned 90 degrees Conservatory at the rear built in 2002. New wooden garage/utility added to the side in 2018 I am unaware of any historical significance of the building. The original building can just be seen in some of the early photographs of Church Road. I am happy for any of the above information to be included in the local listing as a heritage asset if you so wish.</td>
<td>Noted</td>
<td>The detail will be added in.</td>
</tr>
<tr>
<td><strong>Woodbine Cottage 11 High Street</strong></td>
<td>Further to your recent correspondence, we would confirm that we do not want Woodbine Cottage included on any registration for listing. In confirming the aforementioned, we would add that we cannot see any reason or benefit for us as present owners or any possible future owner of Woodbine Cottage in having the property listed, only further red tape and unnecessary bureaucracy. We trust you will respect our wishes and</td>
<td>Agreed</td>
<td>Change to be made as indicated.</td>
</tr>
<tr>
<td>No.</td>
<td>The Old Post Office</td>
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<tr>
<td>7</td>
<td>Thank you for your letter regarding the Local Listings as Heritage Assets, we are delighted that the Old Post Office is being considered and are more than happy for the Parish Council to continue with this endeavour. The property was built around 1850 and was originally a village store with rooms which were let to families. It became the Post Office and Grocery Shop in 1881 and continued as the Post Office for nearly 100 years. Ivy Maycock became Sub Post Mistress running the Post Office from 1928, following on from her mother Ellen Maycock after her death. Ivy and her sister Lucy (Lissaman, nee Hadland) were well known characters throughout the village. Robert Henry Maycock was their brother who never returned from the Great War and was one of our heroes commemorated during the 100 year Remembrance this last year. The Post Office was the only property known to have been bombed within the village during the Coventry blitz of 1940. The adjoining agricultural buildings were destroyed, however one wall remains on</td>
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| Noted | The detail to be added in. |
the southern boundary. We hope this helps, we do have other bits of information but would need to look these out in more details, please do not hesitate to contact us if you would like further details.

| 8 | 90 High Street | With regard to the letter I have recently received from the Parish Council informing me that my property, 90 High Street, is being considered for local listing as a heritage asset. Whilst I appreciate that the Parish Council is attempting to preserve character properties in the village, a rarity in this day and age of planning to meet growing housing requirements regardless of any other considerations. I have investigated the implications, and there are many, of 90 High Street being included in the list. As a result of these considerations and resulting implications I do not wish to give consent for my property, 90 High Street, to be considered for heritage listing | Agreed | Change to be made as indicated. |