

WILLOUGHBY PARISH COUNCIL

Church View
Lower Street
Willoughby
Rugby
CV23 8BX

21 August 2019

Dear Mr Ashcroft

Thank you for your Clarification Note and for the positive comments you have made about the Willoughby Neighbourhood Development Plan. We have addressed each of your comments and questions in blue underneath them so that it is clear which policy or matter we are responding to.

This Note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification. For the avoidance of any doubt matters of clarification are entirely normal at this early stage of the examination process.

The Parish Council's responses (as prepared by the Parish Council and the Steering Group, in consultation with their planning consultants, Kirkwells, and officers from Rugby Borough Council) are shown in blue text.

Initial Comments

The Plan provides a distinctive vision for the neighbourhood area.

The presentation of the Plan is excellent. The difference between the policies and the supporting text is very clear. The maps are very effective. The use of colour is helpful to the layout of the Plan. The photographs are particularly helpful and well-chosen. The Plan has carefully formulated policies to add value to the wider development plan.

Sections 1 and 2 of the Plan provide a very effective introduction to the Plan.

Noted with thanks.

Points for Clarification

I have read the submitted documents and the representations made to the Plan. I have also visited the neighbourhood area. I am now in a position to raise issues for clarification with the Parish Council.

The comments made on the points in this Note will be used to assist in the preparation of my report and in recommending any modifications that may be necessary to the Plan to ensure that it meets the basic conditions. I set out specific policy clarification points below in the order in which they appear in the submitted Plan.

Questions for the Parish Council

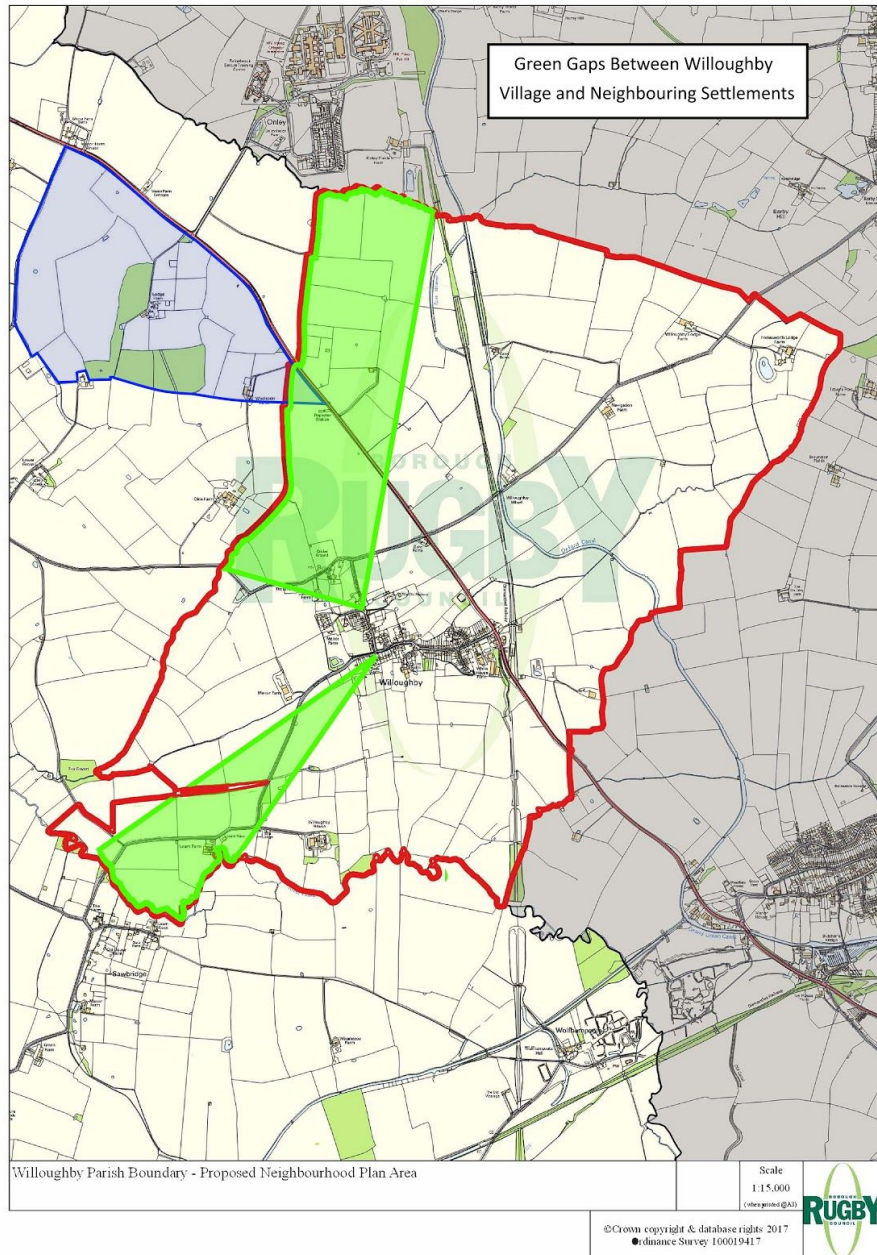
Policy W1

Criterion F is very different from the other criteria in the policy.

The Parish Council agrees that this clause does not sit well with the other criteria as it does not refer to a 'landscape design principle', and would perhaps be better provided as a separate clause to the Policy - perhaps after the first paragraph.

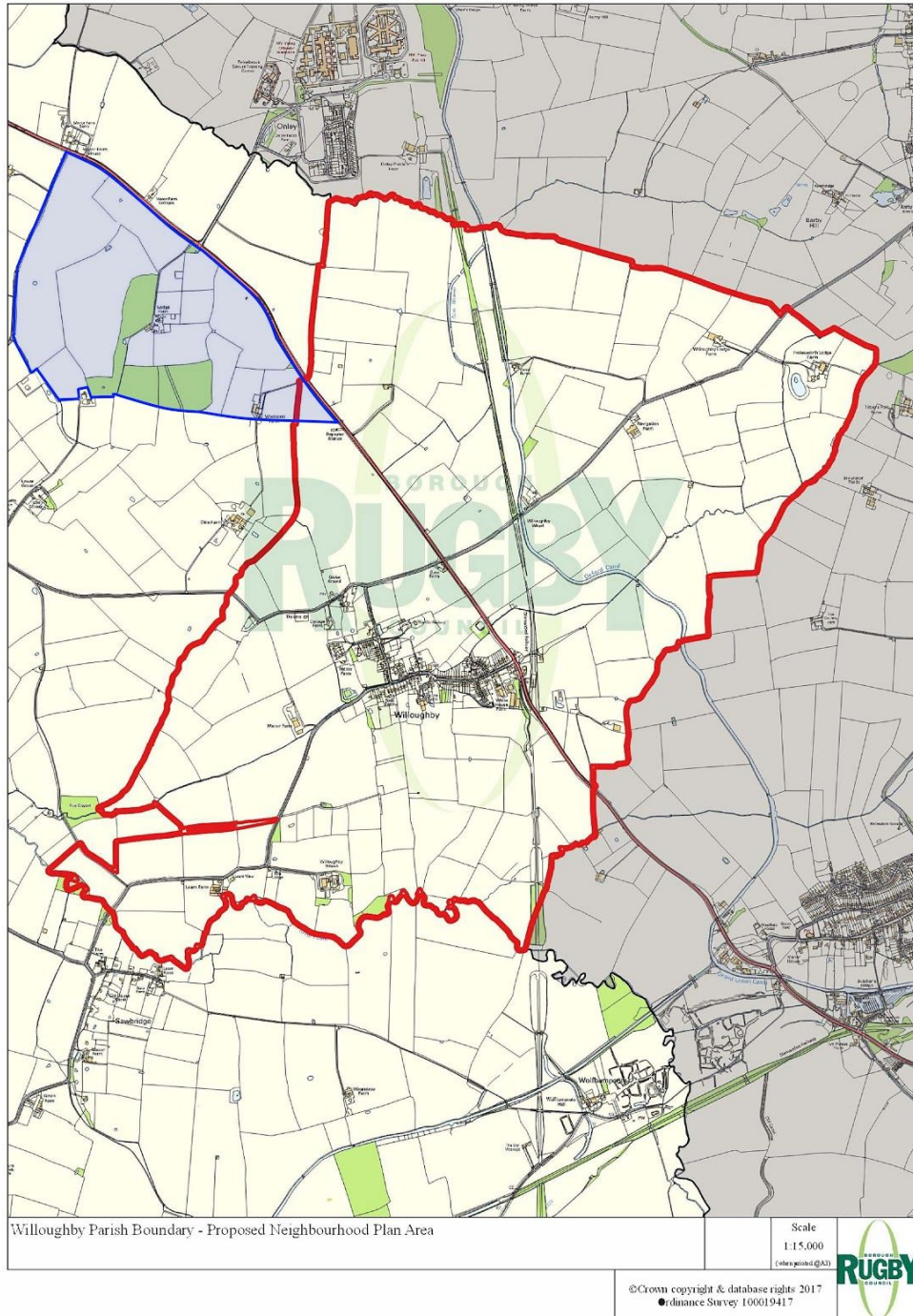
Are the 'green gaps' defined in any document? In any event are all the green gaps within the neighbourhood area?

In response to your questions, the Parish Council has produced a map below to indicate the 'green gaps' described in the Submission NDP. This map shows defined areas within the wider rural area between the settlement of Willoughby and the neighbouring settlements of Onley to the north and Sawbridge to the south west, as well as the area between Willoughby village and Lodge Farm to the west. The green gaps lie within the neighbourhood area and extend from the village of Willoughby to the neighbourhood area boundary. The area to the west between Willoughby and the southern boundary of the 2016 Lodge Farm allocation in the Publication Local Plan has been included to help protect this area from encroachment should this allocation come forward again at some point in the future.



On what basis might 'proposed' green gaps come forward? Is criterion F underpinned by the details provided in paragraph 4.2.20?

Criterion F was included in earlier iterations of the NDP, when the Rugby Borough Local Plan was still under preparation and the proposal referred to in paragraph 4.2.20 at Lodge Farm was a proposed site allocation. The Parish Council objected to this proposal and there were a large number of objections from local people. The map below shows the Neighbourhood Area and the 2016 proposed allocation of Lodge Farm in blue to the north-west.



The Parish Council still has significant concerns that, although the proposed site allocation referred to in paragraph 4.2.20 was not retained in the adopted Rugby Borough Local Plan 2011-31, the rural area on the edges of the settlement is subject to ongoing development pressure. Major development on the edges of these other settlements and within the Willoughby NDP area could have an adverse impact on the rural setting of the neighbourhood area, with built form encroaching on the openness and leading to eventual merging of the distinctive villages.

For example, there are substantial areas of land up for sale both to the south and the north of Willoughby. The land to the south is being sold as pasture (as is the land to the north) but parts of the site (Lots 1 and 4) include a development clawback provision with further details available upon request.

<https://www.rightmove.co.uk/commercial-property-for-sale/property-82936403.html>

<https://www.rightmove.co.uk/commercial-property-for-sale/property-82936427.html>

Policy W2

I saw that the various views had been carefully-chosen.

Noted.

Policy W7

The policy is an excellent local response to this important national matter.

Noted with thanks.

The policy requires that new developments should demonstrate how they have addressed a series of design principles. However, it does not provide any direct policy guidance about the outcome of planning applications which do so. In addition it may have the unintended consequence of allowing a developer to comment that it had addressed the design principles and then chosen not to incorporate them into the final design.

I am minded to recommend a modification to the opening part of the policy so that it offers support to proposals which demonstrate how they have incorporated the design principles into the development as relevant to the specific scheme. Does the Parish Council have any comments on this proposition?

The Parish Council would support such an amendment.

Representations

Does the Parish Council wish to comment on any of the representations made to the Plan?

The Parish Council does not wish to make detailed comments about the representations made during the Regulation 16 public consultation, except with respect to Gladman Developments Ltd. as detailed below. Most consultation bodies who responded to the consultation are supportive of the Plan or have no comments. The Environment Agency and Warwickshire County Council suggested some minor changes to text and the Parish Council would like to leave it to the Examiner to determine whether such changes are required in order to meet the basic conditions.

However, in terms of the Gladman Developments Ltd response, the Parish Council considers that the response reflects an overly aggressive pro-development stance. The

comments do not properly take into consideration the relevant policies of the adopted Rugby Borough Local Plan and in particular Policy GP2 which identifies Willoughby as a Rural Village in the settlement hierarchy, where "*development will be permitted within existing boundaries only, including the conversion of existing buildings where national policy permits*". The surrounding rural area of the Parish is protected in Policy GP2 Countryside where "*new development will be resisted; only where national policy on countryside locations allows will development be permitted.*"

In addition, the Parish Council are concerned that, if Gladman Developments are representing client landowners in the Parish, then this should have been made clear in their response.

We hope we have responded to your questions in a helpful manner but please do contact us if you have any further queries or we have not been clear enough.

Yours sincerely

Mike Thomas

Chair of Willoughby Parish Council