



The Coal
Authority



INVESTOR IN PEOPLE



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For the Attention of: Development Strategy

Rugby Borough Council

[By Email: neighbourhoodplans@rugby.gov.uk]

06 August 2019

Dear Development Strategy

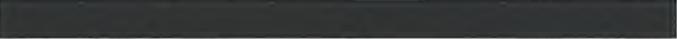
(2) Willoughby Neighbourhood Development Plan

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on it.

Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.

Yours sincerely


Principal Development Manager

Protecting the public and the environment in mining areas



Our ref: UT/2007/101479/AP-06/SB1-L01

Your ref:

Date: 05 August 2019

Dear 

Willoughby Neighbourhood Plan

Submission Draft

Thank you for referring the above consultation which was received on 26 June 2019.

We note the submission of a supporting Flood Risk Report 2018 which provides a comprehensive summary of flood risks from various sources.

We welcome the changes made to the plan, specifically Policies W4 and W5 relating to flood risk and green and blue infrastructure provision in relation to the advice we provided in our response to the previous draft of this plan, referenced UT/2007/101479/AP-05/P01-L01 dated 12 March 2019.

Having reviewed the above proposals, we are of the opinion that the Neighbourhood Plan meets the requirements of the Basic Conditions outlined within the NPPG and the associated supporting statement, sitting within the context of the adopted Rugby Borough Council Local Plan 2011-2031 (adopted June 2019) and the more detailed guidance on flood risk outlined within the NPPG and our Flood Risk Standing Advice.

We recommend that in order to provide clarity and consistency, paragraph 4.3. is revised to read:

“The Environment Agency (EA) recommends that detailed hydraulic modelling of the ordinary watercourses is undertaken as part of any planning application within ~~close proximity of any ordinary watercourse~~ the floodplain as shown on the Flood Map for Planning to properly define the extent of the floodplain taking into account the effect of climate change. Assessment may also be required for development alongside other watercourses which are not currently shown within the mapped floodplain”.

Environment Agency
9, Sentinel House Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

This is to differentiate between the different requirements for development in and out of the mapped floodplain, and bring the section of guidance in line with the policy wording of Policy W5 Part A which states:

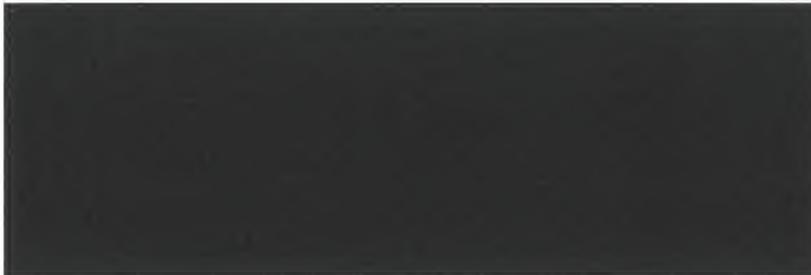
“Any watercourse which does not have any flood extents associated with it, will require further work or modelling as part of detailed planning applications...”

We consider that the plan could be further improved through reference to our Flood Risk Standing Advice available online at <https://www.gov.uk/guidance/flood-risk-assessment-standing-advice> which we feel would provide support for applicants looking to develop within the floodplain and undertake a Flood Risk Assessment (FRA).

We also request an additional point to encourage early discussions with the Environment Agency prior to undertaking detailed design for development proposals within the floodplain. Such enquiries should be sent to swwmpplanning@environment-agency.gov.uk. We find this supports planning applications going through the planning process smoothly and encourages sustainable solutions to growth.

If you have any queries please contact me on the details below.

Yours sincerely



Development Strategy
Rugby Borough Council
Town Hall
Evreux Way
Rugby
CV21 2RR

Gladman House, Alexandria Way
Congleton Business Park
Congleton, Cheshire
CW12 1LB

By email only to: neighbourhoodplans@rugby.gov.uk

1st August 2019


www.gladman.co.uk

Re: Willoughby Neighbourhood Plan Submission (Reg 16) Consultation

Dear Sir/Madam,

This letter provides Gladmans' representations in response to the draft version of the Willoughby Neighbourhood Plan (WNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy. Gladman has considerable experience in neighbourhood planning, having been involved in the process during the preparation and examination of numerous plans across the country, it is from this experience that these representations are prepared.

Legal Requirements

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

- (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).
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.
- (g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

Revised National Planning Policy Framework

On the 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper. On 19th February 2019, MHCLG published a further revision to the NPPF (2019) and implements further changes to national policy.

Directors: D J Gladman BA, K J Gladman MCSP, SRP, J M S Shepherd BSc, CEng, MIEE, G K Edwards DipTP, MRTPI

VAT Registration No. 677 6792 63

Registered Address: Gladman House, Alexandria Way, Congleton Business Park, Congleton, Cheshire, CW12 1LB, Registration No. 3341567

§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. Submission of the WNP ultimately occurred after this date, and the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2018 and corrected in February 2019.

National Planning Policy Framework and Planning Practice Guidance

On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework (NPPF2018). This publication forms the first revision of the Framework since 2012 and implements changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft NPPF2018 consultation. On 19th February 2019, MHCLG published a further revision to the NPPF (2019) and implements further changes to national policy.

The Revised 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 of the preparation of neighbourhood plans within which locally-prepared plans for housing and other development can be produced. Crucially, the changes to national policy reaffirm the Government's commitment to ensuring up to date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 13 states that:

“The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”

Paragraph 14 further states that:

“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

- a. The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;**
- b. The neighbourhood plan contains policies and allocations to meet its identified housing requirement;**
- c. The local planning authority has at least a three-year supply of deliverable housing sites (against its five-year supply requirement, including the appropriate buffer as set out in paragraph 73); and**
- d. The local planning authority's housing delivery was at least 45% of that required over the previous three years.”**

The Revised Framework also sets out how neighbourhood planning provides local communities with the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development needed to meet identified housing needs. Neighbourhood plans should not promote less development than set out in Local Plans and should not seek to undermine those strategic policies. Where the strategic policy making authority identifies a housing requirement for a neighbourhood area, the neighbourhood plan should seek to meet this figure in full as a minimum. Where it is not possible for a housing requirement figure to be provided i.e. where a neighbourhood plan has progressed following the adoption of a Local Plan, then the neighbourhood planning body should request an indicative figure to plan taking into account the latest evidence of housing need, population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

In order to proceed to referendum, the neighbourhood plan will need to be tested through independent examination in order to demonstrate that they are compliant with the basic conditions and other legal requirements before they can come into force. If the Examiner identifies that the neighbourhood plan does not meet the basic conditions as submitted, the plan may not be able to proceed to referendum.

Planning Practice Guidance

Following the publication of the NPPF2018, the Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018 with further updates being made in the intervening period. The updated PPG provides further clarity on how specific elements of the Framework should be interpreted when preparing neighbourhood plans.

Although a draft neighbourhood plan must be in general conformity with the strategic policies of the adopted development plan, it is important for the neighbourhood plan to provide flexibility and give consideration to the reasoning and evidence informing the emerging Local Plan which will be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested against. For example, the neighbourhood planning body should take into consideration up-to-date housing needs evidence as this will be relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. Where a neighbourhood plan is being brought forward before an up-to-date Local Plan is in place, the qualifying body and local planning authority should discuss and aim to agree the relationship between the policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted Development Plan¹. This should be undertaken through a positive and proactive approach working collaboratively and based on shared evidence in order to minimise any potential conflicts which can arise and ensure that policies contained in the neighbourhood plan are not ultimately overridden by a new Local Plan.

It is important the neighbourhood plan sets out a positive approach to development in their area by working in partnership with local planning authorities, landowners and developers to identify their housing need figure and identifying sufficient land to meet this requirement as a minimum. Furthermore, it is important that policies contained in

¹ PPG Reference ID: 41-009-20160211

the neighbourhood plan do not seek to prevent or stifle the ability of sustainable growth opportunities from coming forward. Indeed, the PPG emphasises that;

“.... All settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”²

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 adopted development plan relevant to the preparation of the Willoughby Plan area and the development plan which the WNP will be tested against is the Rugby Local Plan (RLP) which was formally adopted by Rugby Borough Council (RBCC) in June 2019. The RLP covers the period between 2011 and 2031.

The Local Plan proceeds with a housing requirement of 12,400 dwellings between 2011 and 2031 (620 dpa). Whilst the RLP was examined under the terms of the Framework published in 2012, The WNP will be examined in accordance with the policies of the NPPF 2019. It is notable that NPPF 2019 now requires LPAs to consider a review every five years which may have impacts on the neighbourhood plan. With this in mind, Gladman suggest sufficient flexibility is provided in the policies of the plan to safeguard the WNP from conflicting with future development proposals should they be required.

In this context, section 38(5) of the Planning and Compulsory Purchase Act 2004 states:

‘if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).’

Willoughby Neighbourhood Development Plan

This section highlights the key issue that Gladman would like to raise with regards to the content of the WNP as currently proposed. It is considered the requirements of national policy and guidance are not fully reflected in the plan. Gladman have sought to recommend a number of modifications to ensure compliance with basic conditions.

Policy W1: Protecting and Enhancing Rural Landscape Character

Policy W1 is introduced as a policy to protect the “valued local landscape character of Willoughby parish”. It should be noted that, as set out in case law, for a landscape or view to be valued, it would need to have some form of physical

² Paragraph: 001 Reference ID: 50-001-20160519

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.

Policy W1 also goes further to introduce a standard aimed at preventing coalescence. Point 'F.' states:

"The green gaps between Willoughby Village and all other hamlets and villages (existing or proposed) should be protected to prevent coalescence of settlements and to ensure that the settlement of Willoughby village remains distinct."

Whilst Gladman acknowledge that preventing coalescence can assist in maintaining unique and separate identities of existing settlements, the policy is ambiguous and appears to be an attempt to preclude any development whatsoever from coming forward in the gaps between Willoughby and its neighbouring hamlets and villages. In this regard there appears to be no supporting evidence to support this element of the policy, nor a description/map of the extent of land proposed to be protected, nor the limits on the scale of development therein. As such, the policy as currently presented is in conflict with paragraph 16(d) of the Framework which requires policies to be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.

Equally, there is no matching policy in the Rugby Development Plan. There is also no evidence base to assess the land parcels between Willoughby and its surrounding settlements, nor an evaluation of their relative performance in preventing coalescence. Any development proposed within these areas should be assessed on its own merits, depending on landscape impact. The imposition of Policy W1-F. would effectively create a lesser form of Green Belt by the back door. Rugby found no justification for protecting the gaps between the settlements which are proposed in the WNP and therefore, this component of W1 is in conflict with basic condition (e).

Policy W1 in its current form is not in accordance with basic conditions (a), (d) and (e) and should be deleted in its entirety.

Policy W2 – Protecting Significant Local Views

This policy identifies 8 'significant' views which the plan makers consider should be respected. Identified views must be supported by evidence and ensure that they demonstrate a physical attribute elevating a view's importance beyond simply being a nice view of open countryside. The evidence base to support the policy does little to indicate why these views are important and why they should be protected, other than providing a view of the surrounding fields and hedgerows. It therefore lacks the proportionate and robust evidence required by the PPG.³

³ Paragraph: 040 Reference ID: 41-040-20160211

Gladman therefore suggests this element of the policy is deleted as it does not provide clarity and support for a decision maker to apply the policy predictably and with confidence. It is therefore contrary to paragraph 16(d) of the Framework.

Policy W7: Encouraging High Quality and Sustainable Design

Policy W7 sets out a list of 17 design principles that all proposals for development and extension will be expected to follow.

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 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 codes. These provide a framework for creating distinctive places, with a consistent and high quality 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 W8: Providing Suitable Homes

This Policy identifies a settlement boundary for Willoughby and states that land outside of this defined area will be treated as countryside, where development will be carefully controlled to those essential for agricultural operations. Gladman object to the use of settlement boundaries if these preclude otherwise sustainable development from coming forward. The Framework is clear that sustainable development should proceed. Use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a) and (d).

As currently drafted, this is considered to be an overly restrictive approach and provides no flexibility to reflect the circumstances upon which the WNP is being prepared. Greater flexibility is required in this policy and Gladman suggest that additional sites adjacent to the settlement boundary should be considered as appropriate. Gladman recommend that the above policy is modified so that it allows for a degree of flexibility. The following wording is put forward for consideration:

“When considering development proposals, the Neighbourhood Plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Neighbourhood Plan will be supported particularly where they provide:

New homes including market and affordable housing; or

Opportunities for new business facilities through new or expanded premises; or

Infrastructure to ensure the continued vitality and viability of the neighbourhood area.

Development adjacent to the existing settlement will be permitted provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development.”

Indeed, this approach was taken in the examination of the Godmanchester Neighbourhood Plan. Paragraph 4.12 of the Examiner’s Report states:

“...Policy GMC1 should be modified to state that “Development ...shall be focused within or adjoining the settlement boundary as identified in the plan.” It should be made clear that any new development should be either infill or of a minor or moderate scale, so that the local distinctiveness of the settlement is not compromised. PM2 should be made to achieve this flexibility and ensure regard is had to the NPPF and the promotion of sustainable development. PM2 is also needed to ensure that the GNP will be in general conformity with the aims for new housing development in the Core Strategy and align with similar aims in the emerging Local Plan.”

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 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 WNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic condition (a) in its conformity with national policy and guidance and is contrary to (d) the making of the order contributes to the achievement of sustainable development for the reasons set out above.

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,



Gladman Developments Ltd.

Development Strategy
Rugby Borough Council
Town Hall
Evreux Way
Rugby
CV21 2RR

Via Email: neighbourhoodplans@rugby.gov.uk



2 August 2019

Dear Sir/Madam

CONSULTATION ON THE SUBMISSION VERSION OF THE WILLOUGHBY NEIGHBOURHOOD DEVELOPMENT PLAN

Highways England welcomes the opportunity to comment on the submission version of the Willoughby Neighbourhood Development Plan which covers the period 2019-2031. We note that the document provides a vision for the future of the Parish and sets out a number of key objectives and planning policies which will be used to help determine planning applications.

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 to national economic growth. In relation to the Willoughby Neighbourhood Development Plan, our principal interest is safeguarding the operation of the A5 and M45 in the area. The A5 routes approximately 6 miles to the east of the Neighbourhood Plan area whilst M45/ A45 junction is located circa 3 miles to the north of the Plan area.

We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Willoughby is required to be in conformity with National Planning Policy Framework and National Planning Practice Guidance, saved Local Plan Policies and the Rugby Borough Council Local Plan. This is acknowledged within the Neighbourhood Plan.

In the Local Plan Policy adopted in June 2019, Willoughby is identified as a 'Rural Village' settlement hierarchy and we note that no specific housing or employment sites have been allocated in the Local Plan for the Willoughby Parish. Considering this, we note that the Neighbourhood Plan only identifies small scale housing development within the village limits of Willoughby to meet local needs (*Policy W8*). Given the limited scale of housing growth and distance of the Neighbourhood Plan area from the SRN,

we do not consider that there will be any material impacts on the operation of the A5 or the M45.

We have no further comments to provide and trust that the above is useful in the progression of the Willoughby Neighbourhood Development Plan.

Yours sincerely,



Spatial Planning and Economic Development Team





Historic England



Direct Dial: [REDACTED]

Our ref: PL00536542

1 August 2019

Dear [REDACTED]

WILLOUGHBY NEIGHBOURHOOD PLAN- REGULATION 16 CONSULTATION

Thank you for the invitation to comment on the Submission Neighbourhood Plan. Historic England is extremely supportive of both the content of the document and the vision and objectives set out in it and we can confirm that our Regulation 14 comments remain entirely relevant. That is:

"We particularly commend the use of historic characterization to provide a context and a sound evidence base for well thought out Plan policies. The Plan has also benefitted from the advice of Warwickshire County Council (WCC) specialists as evidenced by the WCC HER records that are referenced.

In this and other respects Historic England considers that the Plan takes an exemplary approach to the historic environment.

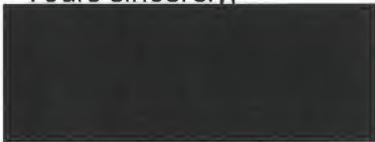
The emphasis on the conservation of local distinctiveness through good design and the protection of locally significant buildings and landscape character including archaeological remains, farmsteads and important views is to be applauded.

Overall Historic England considers that the Willoughby Draft Neighbourhood Plan is a well-considered, concise and fit for purpose document that exemplifies "constructive conservation" and constitutes a very good example of community led planning".

In conclusion, in the view of Historic England all those who have clearly worked extremely hard in drafting the Plan are to be congratulated on the end product.

I hope you find this response helpful.

Yours sincerely,



Historic Places Advisor



cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6888
HistoricEngland.org.uk



Martin Needham

From: [REDACTED]
Sent: 22 July 2019 14:50
To: Neighbourhoodplans
Subject: Willoughby NDP

I am writing to register my strong support for the Willoughby NDP in particular of the focus upon the surrounding landscape in terms of its heritage and nature value. The NDP brings into focus the wider value of our landscape ensuring that it is properly considered when planning proposals are determined in the future.

Regards,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 04 July 2019 12:22
To: Local Plan
Subject: Willoughby Plan

[REDACTED] Thank you for this information. Kind regards, [REDACTED]
Sent from my BlackBerry® wireless device

Development Strategy
Rugby Borough Council
Town Hall
Evreux Way
Rugby
CV21 2RR

██████████
Consultant Town Planner
████████████████████

Sent by email to:
neighbourhoodplans@rugby.gov.uk

12 July 2019

Dear Sir / Madam

**Willoughby Neighbourhood Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

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 Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.

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 National Grid's 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.

National Grid has identified that it has **no record** of such apparatus within the Neighbourhood Plan area.



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

Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the 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.

[Redacted]

Consultant Town Planner

n.grid@woodplc.com

Wood E&I Solutions UK Ltd
Nicholls House
Homer Close
Leamington Spa
Warwickshire
CV34 6TT

[Redacted]

Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
Warwickshire
CV34 6DA

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

Yours faithfully

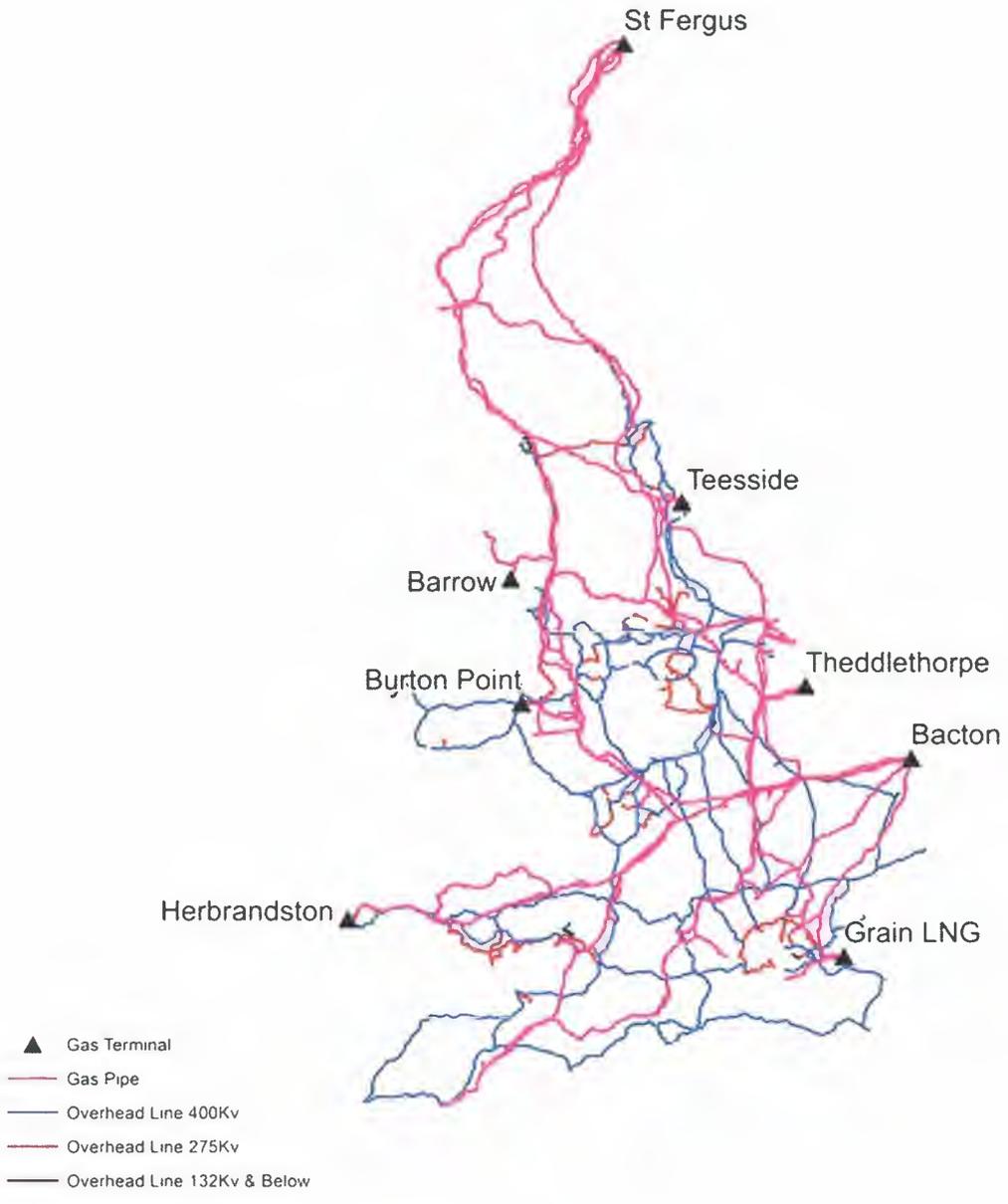
[Redacted]

Consultant Town Planner

[Redacted]

APPENDIX 1: NATIONAL GRID'S UK NETWORK

Where we operate
Our UK network



Date: 16 July 2019
Our ref: 288603
Your ref: Willoughby NDP



[REDACTED]
Development Strategy Team
Rugby Borough Council
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Evreux Way
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BY EMAIL ONLY

neighbourhoodplans@rugby.gov.uk

T 0300 060 3900

Dear Mr Needham

Willoughby Neighbourhood Development Plan – Regulation 16

Thank you for your consultation on the above dated 25 June 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 the Willoughby Neighbourhood Development Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

[REDACTED]
Consultations Team

From: TownPlanning LNW <TownPlanningLNW@networkrail.co.uk>
Sent: 26 June 2019 08:01
To: Neighbourhoodplans
Subject: Rigby - Willoughby Neighbourhood Plan

Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).

There are no comments on the NP.

From

**Town Planning Technician LNW
Network Rail**

The content of this email (and any attachment) is confidential. It may also be legally privileged or otherwise protected from disclosure.

This email should not be used by anyone who is not an original intended recipient, nor may it be copied or disclosed to anyone who is not an original intended recipient.

If you have received this email by mistake please notify us by emailing the sender, and then delete the email and any copies from your system.

Liability cannot be accepted for statements made which are clearly the sender's own and not made on behalf of Network Rail.

Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office
Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN

[Redacted]

From: [Redacted]
Sent: 25 July 2019 11:43
To: Neighbourhoodplans
Subject: Willoughby Neighbourhood Development Plan

I support this Plan. I am a member of the Steering Committee.

[Redacted]

[REDACTED]

From: [REDACTED]
Sent: 04 July 2019 14:16
To: Local Plan
Subject: RE: Planning Consultation (Neighbourhood Plan)
Attachments: Ryton on Dunsmore 1 Response.pdf

Dear Sir/Madam,

Thank you for giving Severn Trent the opportunity to comment on Ryton on Dunsmore and Willoughby Neighbourhood Plan. Our response is attached 'Ryton on Dunsmore 1 Response'.

With regards to Willoughby Neighbourhood Plan – We are supportive of this plan and have no further comments to add.

Please keep us informed as your plans develop.

Best Wishes,

[REDACTED]
Strategic Catchment Planner (Warwickshire, Worcestershire & Gloucestershire)
Drainage and Wastewater Management Planning (DWMP)
Mobile: [REDACTED]
Email: [REDACTED]

WONDERFUL ON TAP



 Consider the environment. Please don't print this e-mail unless you really need to.



██████████ Development Strategy Manager
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31st July 2019

Dear ██████████,

Formal consultation: Willoughby Neighbourhood Plan
Regulation 16 of the Neighbourhood Planning General Regulations

I refer to the above consultation.

The County Council welcomes communities proposing neighbourhood Plans that shape and direct future development. The main responsibilities of the County Council are highways and public transport, education, social services, libraries and museums, recycling/ waste sites and environment. The County Council's role is to deliver the services and facilities efficiently.

Financial implications of Parish Plans

We would like to state at the outset that the County Council cannot commit to any financial implications from any proposals emanating from Neighbourhood Plans. Therefore, Neighbourhood Plans should not identify capital or revenue schemes that rely of funding from the Council. However, we will assist communities in delivering infrastructure providing they receive any funding that may arise from S106 agreements, Community Infrastructure Levy or any other sources.

We made comments of highway matters and have no additional matters to add.

Flood Risk Matters

We have some minor suggestions and these are contained in appendix A attached to this letter.

S106 monies

The Parish Council may receive S106 monies for highway mattes and should they wish to spend any of the monies on highways or other environmental matters please contact us. Any works to or within Highway land will require further consents from the County Council. Further, should you wish the County Council to undertake any works

*Working for
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please contact [REDACTED] in the first instance on E mail

[REDACTED]

Should you wish to discuss any of the above matters please contact me?

Yours sincerely

[REDACTED]
Strategic Planning and Development Manager

Tabulated Warwickshire County Council Flood Risk Management Comments on the Willoughby Neighbourhood Development Plan 2019 to 2031

WCC FRM has the following content related comments:

Page	Paragraph No.	Commencing:	Comment
36/37	Policy W5	<i>Reducing flood risk</i>	<p>The following points could be incorporated into the policy:</p> <ul style="list-style-type: none"> - SuDS features should be at the surface and adequate treatment of flows should be provided to ensure that final flows leaving the site do not degrade the quality of accepting water bodies. - Point I) Re-word to say that all 'SuDS features should be located outside of the flood zones and surface water outlines, to ensure that the full capacity is retained', rather than the '1 in 100 year plus climate change flood extent'. - Requirements set out in the following documents should also be adhered to in all cases: <ul style="list-style-type: none"> • 'The SuDS Manual' CIRIA C753 • DEFRA's Non-statutory technical standards for sustainable drainage • The National Planning Policy Framework • The Planning Practice Guidance (PPG) • Warwickshire County Council's Flood Risk Management Standing Advice document, found on the website https://apps.warwickshire.gov.uk/api/documents/WCCC-1039-73 - Please be aware that 5 l/s is NOT the minimum possible discharge rate achievable. On smaller development sites where the discharge rate is below 5 l/s, these rates are achievable through water reuse, protected orifices, and better design. - The adoption and maintenance of all drainage features is a key consideration to ensure the long term operation and efficiency of SuDS. As part of the planning procedure the LLFA will expect to see a maintenance schedule, at detailed design stages. All SuDS features should be monitored and cleaned regularly as a matter of importance.