

1.0 Background

87711

Comment

Respondent: Nuneaton & Bedworth Borough Council**Summary:**

We have no comments to make on this one but thank you for consulting with NBBC.

Full text:

We have no comments to make on this one but thank you for consulting with NBBC.

Attachments: None

87752

Comment

Respondent: Jane Weston**Summary:**

With reference to the above, there is no reference to any area for allotments which are continuously in demand. Suggest an area is put aside.

Full text:

With reference to the above, there is no reference to any area for allotments which are continuously in demand. Suggest an area is put aside.

Attachments: None

87753

Comment

Respondent: Historic England**Summary:**

Our previous comments on the earlier regulation 14 consultation remain entirely relevant, that is:

"Historic England is supportive of the content of the document and believes it takes a thoughtful and suitably proportionate approach to the historic environment of the Parish"

Beyond those observations we have further no substantive comments to make on what Historic England considers is a good example of community led planning.

Full text:

Thank you for the invitation to comment on the Submission Neighbourhood Plan.

Our previous comments on the earlier regulation 14 consultation remain entirely relevant, that is:

"Historic England is supportive of the content of the document and believes it takes a thoughtful and suitably proportionate approach to the historic environment of the Parish"

Beyond those observations we have further no substantive comments to make on what Historic England considers is a good example of community led planning.

I hope you find this advice helpful.

Attachments:

_HERef_PL00797291_L459867.doc - <https://warwickdc.oc2.uk/a/s9n7>

87758

Comment

Respondent: The Coal Authority Planning Team**Summary:**

Thank you for your notification of 31 October 2024 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

However, the area to which this consultation relates is not located within the defined coalfield. On this basis we have no specific comments to make.

Full text:

Thank you for your notification of 31 October 2024 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

However, the area to which this consultation relates is not located within the defined coalfield. On this basis we have no specific comments to make.

Attachments:

Coal Authority Response 14-11-2024 121942846.pdf - <https://warwickdc.oc2.uk/a/s9nv>

87849

Comment

Respondent: Natural England**Summary:**

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 and to the following information.

(Please see attached)

Full text:

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 and to the following information.

Attachments:

492405 NE Response.pdf - <https://warwickdc.oc2.uk/a/s9ng>

87853

Comment

Respondent: Environment Agency**Summary:**

We would not offer detailed bespoke advice on Policy but advise that you ensure conformity with the adopted Core Strategy and, in consideration of the Warwick District Local Plan, and refer to guidance within our local NDP proforma guidance (copy enclosed).

To assist us in the West Midlands Area in providing the most focused and accurate consultation responses through the Neighbourhood Planning process we have produced the below guidance and pro-forma for you to consider, complete and return to the Planning Policy Team at Warwick District Council.

Please see attached.

Full text:

The Environment Agency aims to reduce and protect against flood risk, whilst protecting and enhancing the water environment, land, and biodiversity. To assist us in the West Midlands Area in providing the most focused and accurate consultation responses through the Neighbourhood Planning process we have produced the below guidance and pro-forma for you to consider, complete and return to the Planning Policy Team at Warwick District Council.

You may wish to also refer to the Neighbourhood planning - GOV.UK (www.gov.uk) guidance to

assist you in the preparation of your Plan.

The Environment Agency, along with Natural England, Historic England, and the Forestry Commission (now known as Forestry England), has also produced some national guidance which offers further environmentally specific information in the context of Neighbourhood Planning and gives ideas on incorporating the environment into Plans. The guidance is available at: How to consider the environment in Neighbourhood plans.

In the context of Climate Change there is further information on writing a low-carbon Neighbourhood Plan available at: How to write a neighbourhood plan in a climate emergency. To compliment the above we have produced the following guidance to assist you in the West Midlands Area specifically. This takes you through some of the relevant environmental issues your community should consider when producing a Neighbourhood Plan. We recommend completing the pro-forma to check the environmental constraints specific to your Plan area, which should help identify challenges, inform evidence and policy, and assist delivery of sustainable solutions. This approach will help ensure you have a robust Plan.

Flood Risk: Your Plan should conform to national and local policies on flood risk. National Planning Policy Framework (NPPF) – Paragraph 165 states that 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere'.

With reference to the adopted Warwick District Local Plan (2011-2029) it is important that your Plan is in accordance with Policy FW1 – Reducing Flood Risk and the associated text.

New Local Plan - Download - Warwick District Council (warwickdc.gov.uk)

If your Plan is proposing sites for development you should check whether any of the proposed allocations are at risk of river or tidal flooding based on our Flood Map (of modelled flood risk). For example, are there any areas of Flood Zone 3 or 2 (High and Medium Risk). In line with National Planning Policy and, specifically, the Sequential Test, you should aim to locate built development within Flood Zone 1, the low-risk Zone. Our Flood Map can be accessed via the following link: Check the long term flood risk for an area in England - GOV.UK (www.gov.uk)

In addition to the above you should also check with the Council's Planning Policy Team with regards to other sources of flooding (such as surface water, groundwater, sewers, and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). Warwickshire County

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Council as the Lead Local Flood Authority (LLFA), has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map. Specifically, some watercourses have not been modelled on our Flood Maps (Our Flood Maps primarily show flooding from Main Rivers, not ordinary watercourses, or un-modelled rivers, with a catchment of less than 3km²

). The SFRA also gives information on the 'functional floodplain', also known as Flood Zone 3b. The National Planning Practice Guidance (NPPG) shows the different Flood Zones in Table 1 in the Flood Risk and Coastal Change Section: Flood risk and coastal change - GOV.UK (www.gov.uk)

Any allocations in areas of flood risk should include a consideration of climate change (see below). In the absence of up-to-date modelled flood risk information, or a site-specific FRA, to confirm an appropriate allowance you may wish to utilise the current Flood Zone 2 extent (where available) to indicate the likely, nominal, Flood Zone 3 with climate change extent. Where no modelling or flood map outline is available you will need to consider an alternative approach. Where an un-modelled watercourse is present, or adjacent to a site, then it may be prudent to incorporate a buffer zone, relative to topography, in consideration of flood risk not shown on the Flood Map.

Some assessment is necessary in your Plan, to confirm that the site is developable. This includes safe occupation and that there will be no impact on third parties. You might seek opportunities to reduce flood risk.

All 'major development' sites with flood risk issues, especially those with ordinary watercourses or un-modelled rivers within/adjacent or near to sites, are likely to need detailed modelling at the planning application stage to verify the design flood extents, developable areas and that the development will be sustainable.

Climate Change: Your Local Authority's SFRA should indicate the extent of flood zones with likely climate change. The NPPG refers to Environment Agency guidance on considering climate change in planning decisions which is available online: <https://www.gov.uk/guidance/flood-riskassessments-climate-change-allowances>.

Please refer to our separate 'Area Climate Change Guidance' (March 2023) for more information on how to consider and incorporate allowances in development proposals. This advises that an allowance should be added to 'peak river flows' to account for 'climate change' which should be specific to a river 'management catchment'.

You may wish to use the following link in conjunction with our Area Specific Climate Change Guidance to ascertain the correct climate change peak flows allowances in your area: Climate change allowances for peak river flow in England (data.gov.uk).

Surface water (peak rainfall intensity) climate change allowances should be discussed with the

LLFA.

Flood Defences: Areas of your Parish, or proposed sites, may be afforded protection by a flood defence/alleviation scheme. Where this is the case, your Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping.

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Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.

Waste Water Infrastructure: Waste water infrastructure is also of importance in your Plan.

Where housing is proposed you should use the pro-forma to identify the receiving treatment works and whether the housing and/or any employment growth can be accommodated without impacting the receiving treatment works. You should look at physical capacity issues (e.g. network pipes) and environmental capacity (quality of treated effluent) issues. In addition you should contact the Water Company for further advice.

Where there is an identified constraint (amber or red) you should demonstrate that there is a solution (it may be already programmed or could be a possible future infrastructure upgrade) to help improve the capacity issue and enable the development to go ahead. This will require consultation with the Water Company, and we have developed some general questions to assist this process. The outcome of this may inform a 'phasing' policy within your plan where appropriate. It may also be necessary to produce an 'Infrastructure Delivery Plan' to set out any key milestones for wastewater infrastructure upgrades and improvements. The evidence you produce should give a reasonable degree of certainty to all parties, helping demonstrate development is deliverable, and importantly ensure that your plan is 'sound'.

Note: Government Guidance states that sufficient detail should be provided to give clarity to all parties on when infrastructure upgrades will be provided, looking at the needs and costs (what and how much). The NPPG refers to "ensuring viability and deliverability – pursuing sustainable development requires careful attention to viability and costs in plan making and decision making". Plans should be "deliverable".

We would recommend discussions with the Utility Company to ascertain how you can progress with your Plan without impact on the works. To assist in these discussions, we would recommend the following:

- What solutions are programmed within Asset Management Plans (AMP)? When will these solutions be delivered? Are there any options for accelerating these schemes via developer contributions?
- In the absence of any improvement schemes what could alternative solutions be (type and location of) for short/medium/long term growth. Are these solutions cost prohibitive?
- Are there any short-term options to facilitate growth? Some options to consider could be SUDS retrofitting or removing surface water from sewer systems.
- Utility companies could be asked about what Water Framework Directive (WFD) work they already have programmed in to their AMP Schemes for Phosphate stripping or other sanitarities (e.g. ammonia/Biological Oxygen Demand).
- With reference to the Nutrient Management Plan (where this is relevant), and Phosphate specific issues, are there any stringent measures factored in to ensure no environmental deterioration? What improvement scheme is, or could be, in place to bring forward development?

Water Management and Groundwater Protection: In February 2011, the Government signalled its belief that more locally focussed decision making, and action should sit at the heart of improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under the Water Framework Directive (WFD). It seeks to:

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- deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and
- encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment.

Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the water environment. Local WFD catchment data can be obtained from: River Basin Catchment Data Explorer.

Aquifers and Source Protection Zones (SPZs): Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below).

SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection Position Statements:

<https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Development and surface water drainage will need to be carefully located and designed to avoid pollution risks to waters and address potential environmental impact associated with low

flows. For example SuDS may need to provide multiple levels of treatment. To address any quantitative issues with the waterbodies, SuDS should be designed so as to maximise recharge to the aquifer and support water levels in receiving rivers.

Water Efficiency at Neighbourhood Plan Level: Local Water Efficiency targets may be secured in a neighbourhood plan or higher-level local plan policy. The draft Technical Standards – Housing Standards Review (Paragraph 14) provided advice on more stringent ('optional') water efficiency targets/measures, which go beyond the minimum building regulations standard. Paragraph 14 states that..."Neighbourhood Planning Bodies will only be able to apply the space standard and not optional requirements".

These standards have since been enshrined into the Building Regulations (part G) "The optional requirement only applies where a condition that the dwelling should meet the optional requirement is imposed as part of the process of granting planning permission. Where it applies, the estimated consumption of wholesome water calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day". However, there is no direct responsibility for Neighbourhood Plans to incorporate these water efficiency measures.

Cemetery Allocations: Allocations for cemeteries brought forwards within Neighbourhood Plans must consider their location in relation to Flood Zones, Source Protection Zones (Any Borehole, including private boreholes, for potable supply should be considered) and Type of Aquifer. We would offer comments primarily in relation to the protection of controlled waters (i.e. groundwater and surface water). Matters relating to human health should be directed to the Local Authority. If steps are not taken to reduce the risks, burials can present a risk to the water environment. The proposed burial ground will need to meet our minimum groundwater protection requirements as set out in the following document: Protecting groundwater from human burials - GOV.UK (www.gov.uk) .

Biodiversity Net Gain: Development of allocated sites offers the opportunity for Biodiversity Net Gain (BNG) as referenced in Paragraphs 180, 185 and 186 of the NPPF 'Conserving and enhancing the natural environment'. Specifically, any ponds and flood storage areas if designed correctly could also provide opportunity for blue and green infrastructure, such as wetland habitat throughout the year as well as providing a recreation amenity.

5 of 5

Whilst we would not necessarily expect to see specific BNG details for allocations within the Plan, there may be an opportunity to promote 'Net Gains' within your Policies.

Please see Biodiversity net gain - GOV.UK (www.gov.uk) and Biodiversity Net Gain for local authorities | Local Government Association for further information.

Neighbourhood Plan Environment Agency Pro-Forma

Site Allocation

Description

e.g. name,

type and

number of

units.

Flood

Zone

(3/2/1) *

Unmodelled

river or ordinary

watercourse in

or adjacent to

site

Other

sources of

flooding

(e.g. SW,

GW, SF)

Flood

Defence

Aquifer/Source

Protection Zone 1

(Description)

Environmental

Capacity at

Treatment Works

(Red – potential

showstopper,

Amber – possible

problem; or Green

– likely to be no

issues)

Example 2 Y SW N N Amber

Y/N Y/N Y/N

Y/N Y/N Y/N

Y/N Y/N Y/N

Y/N Y/N Y/N

Y/N Y/N Y/N

Y/N Y/N Y/N

Y/N Y/N Y/N

Y/N Y/N Y/N

*Note to above: Flood Zone 3 is the high-risk zone and is defined for mapping purposes by the Environment Agency's Flood Zone Map. Flood Zone 3 refers to land where the indicative annual probability of flooding is 1 in 100 years or less from river sources (i.e. it has a 1% or greater chance of flooding in any given year). Flood Zone 2 is land where the indicative annual probability of flooding is between 1 in 100 and 1 in 1000 years. Flood Zone 1 is the lowrisk Zone with a flood risk in excess of 1 in 1000 years.

When considering 'other sources of flooding' you should refer to the SFRA and contact Warwick District Council to ascertain whether the Parish, or specific allocated site, is impacted by surface water, groundwater, or sewer flooding etc. The team and/or the LLFA may also have historic flooding information to help inform your plan. More information on sewer flooding, or plans to remedy such, may be available from the Water Company.

Attachments:

Warwick - neighbourhood plan proforma.pdf - <https://warwickdc.oc2.uk/a/s9nx>

3.0 Cubbington Neighbourhood Area

87763

Comment

Respondent: Warwickshire County Council

Summary:

QV S3.1 - You could add to your objective a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield sites

Full text:

Please see attachment.

Attachments:

WCC FRM NDP Comments R1.pdf - <https://warwickdc.oc2.uk/a/s9nb>

87850

Comment

Respondent: George Percy

Summary:

3.0 Cubbington Neighbourhood Area

Comment re: Figure 4. – The aerial photograph used in Figure 4 of the submission plan is out of date and does not show the impact of the construction of the High Speed Two (HS2) railway line to the east of the Neighbourhood Plan Area. The new railway cuts through a significant proportion of the Neighbourhood Plan Area including 'South Cubbington Wood' and farmland to the east of Cubbington. This is a key feature in the landscape of 'the area today' and should therefore be visible within the photograph used in Figure 4 in order to provide context.

Comment re: History and Development of Cubbington – the context of the development of the HS2 line to the east of the Neighbourhood Plan Area is not included within this section. This development has had a significant impact of the village and is referred to in later sections of the plan. Context should be provided here in respect of this development which has had a significant impact on the landscape to the east of Cubbington; cutting through 'South Cubbington Wood' and the farmland to the east of Cubbington and permanently redirecting public rights of way.

Full text:

1.0 Background

No comment

2.0 Cubbington Neighbourhood Development Plan Key Issues, Vision and Objectives

No comment

3.0 Cubbington Neighbourhood Area

Comment re: Figure 4. – The aerial photograph used in Figure 4 of the submission plan is out of date and does not show the impact of the construction of the High Speed Two (HS2) railway line to the east of the Neighbourhood Plan Area. The new railway cuts through a significant proportion of the Neighbourhood Plan Area including 'South Cubbington Wood' and farmland

to the east of Cubbington. This is a key feature in the landscape of 'the area today' and should therefore be visible within the photograph used in Figure 4 in order to provide context.

Comment re: History and Development of Cubbington – the context of the development of the HS2 line to the east of the Neighbourhood Plan Area is not included within this section. This development has had a significant impact on the village and is referred to in later sections of the plan. Context should be provided here in respect of this development which has had a significant impact on the landscape to the east of Cubbington; cutting through 'South Cubbington Wood' and the farmland to the east of Cubbington and permanently redirecting public rights of way.

4.0 Planning Context

Comment re: Emerging Planning Policy – on the 22nd November 2024, Warwick District Council (WDC) and Stratford on Avon District Council (SoADC) published the Regulation 18 'Preferred Options Consultation' paper of the South Warwickshire Local Plan, as part of the Agenda for the Joint Cabinet Committee meeting scheduled for 6pm on 12th December 2024. The decision of the Joint Cabinet Committee will take place after this Neighbourhood Plan consultation period has closed. The Planning Context within the Neighbourhood Plan should be updated to take account of the emerging Local Plan process. Most notably for Cubbington as follows:

- The chosen Spatial Growth Strategy of; 'Sustainable Travel and Economy'
- The identification of the 'Strategic Growth Location; East of Lillington Group' which is within the Neighbourhood Plan Area.
- The Part 1 Green Belt review which identifies the following land parcels around Cubbington as follows:

2

Location Parcel Ref: Overall Assessment to Green Belt

LSP 6 'Moderate Contribution'

LSP7 'Weak Contribution'

CUB1 'Moderate Contribution'

CUB2 'Moderate Contribution'

CUB3 'Moderate Contribution'

- The 'East of Lillington Group' identified as the 'emerging best performing' Strategic Growth Location against the Sustainability Appraisal framework.

5.0 Neighbourhood Plan Policies

Comment re: Policy CNDP1 – Protecting Local Green Space

The following areas as shown on the Policies Map are within the Green Belt and are therefore already provided strong planning protection. It should be questioned whether any 'additional local benefit' is gained by further designating them as 'Local Green Space':

- CNDP 1/2 – Austen Court play area
- CNDP 1/3 – North Cubbington Wood
- CNDP 1/4 – South Cubbington Wood
- CNDP 1/5 – The Runghills

Comment re: para 5.7 - Open spaces are defined in the Town and Country Planning Act 1990 as; 'any land laid out as public garden, or used for the purposes of public recreation, or land which is a disused burial ground.' It is questionable whether the sites identified in 'Table 2' are within this definition (see further detail below).

Comment re: Policy CNDP2 – Protecting Other Green Spaces

The policy refers to 'other green spaces,' there is no clear definition of what this encompasses. There appears to be confusion between the definition of 'green space' and 'open space.' Item 'b' within the draft policy refers to 'open space' in relation to local environment, amenity and active public recreation use. This is a narrower definition than seems to be implied by the use of the term 'other green space.'

Comment re: para 5.8 The majority of land around Cubbington is within the Green Belt and therefore already has significant planning protection. It is therefore questioned whether draft policy CNDP2 has any real function.

Comment re: para 5.9 this paragraph refers to 'in addition to protecting the two spaces identified under Policy CNDP 1.' There are five areas identified in draft policy CNDP1. This appears to be an error.

Comment re: Table 2. Local Green Space Assessment

Comment re: 'HS2 Route' – The land between Cubbington Woods and the village is not 'open space' as defined in the Town and Country Planning Act 1990. The land is private farmland in

3

arable crop production. The land is crossed by three public right of way footpaths. All three footpaths have been disrupted and redirected by the construction of HS2. This land, which extends to over 130 acres, is described in Table 2 as 'to be maintained as open green space.' The land is not currently designated as 'open green space' and it is inappropriate to therefore suggest that it should be maintained as such. The reference to site ref: 202 indicates that there is a desire to preclude this land from the emerging Local Plan process which would be inappropriate particularly given the status of Cubbington as a 'Growth Village'. The reference

to site 202 in this section of the plan should be removed. All of this land is protected by Green Belt policy and therefore it is not necessary for the Neighbourhood Plan to try and provide further restriction, particularly via Policy CNDP2, which is poorly defined.

Comment re: 'Site 97 South Warwickshire local plan' – The land between Lillington and Cubbington is described as 'open land' in Table 2. It is not clear what the definition of 'open land' is? This land is private farmland in arable crop production. The land is crossed by two public rights of way footpaths. This land does not meet the definition of 'open space' as defined in the Town and Country Planning Act 1990. In total this land extends to over 130 acres. All of this land is protected by Green Belt policy and therefore it is not necessary for the Neighbourhood Plan to try to provide further restriction, particularly via Policy CNDP2, which is poorly defined.

Comment re: Policy CNDP2 – it is not clear what areas of land this draft policy refers to. The areas identified in Table 2 are large and comprise a large proportion of the Neighbourhood Plan area. The majority of these areas are protected by Green Belt policy and therefore it does not seem necessary for Policy CNDP2 to be included within the Plan. Policy CNDP2 should be removed from the plan.

Policy CNDP3 – Sustainable Design and Construction

No Comment

Comment re: Policy CNDP4 – Conserving and Enhancing the Landscape

It is noted that the enhancement of the landscape is likely to be delivered through new development. The degradation of the landscape by HS2 provides opportunity for repair and enhancement if funds can be achieved via new development within the village.

Comment re: Figure 18 – Landscape Sensitivity to Housing Development was published in 2013 and is therefore out of date. In particular, the construction of HS2 has changed the landscape to the east of village. HS2 now provides a clear 'defensible boundary' for development rather than the 'open countryside' referred to in the Inspector's report. The emerging evidence of the South Warwickshire Local Plan should be considered and it is likely that developers will commission suitable evidence to accompany planning applications for consideration against Policy CNDP 4 at the appropriate time. Figure 18 should be deleted.

Policy CNDP 5 – Cubbington Conservation Area

No Comment

4

Policy CNDP 6 – Protection and Enhancement of Community Facilities

Comment re: para 5.36 the desire to protect, enhance and renew community facilities is noted. The delivery of new development will generate planning gain by way of Section 106 contributions and Community Infrastructure Levy (CIL). WDC are a CIL charging authority. The delivery of development will generate capital in order to deliver on policy CNDP 6.

Comment re: Policy CNDP7 – Community Infrastructure

Both land and capital can be provided via the delivery of new development on a site within the village. By working with applicants, the Parish can meet the aspirations of the Neighbourhood Plan. It is likely that some new development within Cubbington will be delivered via emerging local and national planning policies and the Neighbourhood Plan should ensure the necessary infrastructure is delivered to meet the needs of the current residents as well as those of new residents.

Attachments:

Representations.docx - <https://warwickdc.oc2.uk/a/s9nh>

4.0 Planning Policy Context

87755

Comment

Respondent: Mr Peter Clayton

Summary:

Firstly, it is not entirely clear how many houses are needed in Cubbington to meet the SWLP requirements, nor how much land is required for this purpose. Section 4.5 identifies Cubbington as a growth village, with Policy DS6 Level of Housing Growth setting a district target of 16,776 new homes between 2011 and 2029, with Growth Villages contributing a minimum of 968 new homes. Does this imply that we need to build over 968 houses in Cubbington to meet this target? Moreover, does this 968-target include the H25, H26, and Waverley Riding School housing developments in Figure 11 section 4.5, plus 133 new houses built in 2024, thereby requiring 835 new houses?

Additionally, I am seeking clarification on the amount of land needed to accommodate the aforementioned housing requirements. Is it anticipated that this development will be concentrated in a single area, or spread across multiple locations in Cubbington?

I am particularly concerned about the land proposed for development as part of the call for land, as it is all Green Belt. I strongly believe that our Green Belt areas should remain protected to prevent urban expansion, which is why they are designated as "Green Belt."

Full text:

Firstly, it is not entirely clear how many houses are needed in Cubbington to meet the SWLP requirements, nor how much land is required for this purpose. Section 4.5 identifies Cubbington as a growth village, with Policy DS6 Level of Housing Growth setting a district target of 16,776 new homes between 2011 and 2029, with Growth Villages contributing a minimum of 968 new homes. Does this imply that we need to build over 968 houses in Cubbington to meet this target? Moreover, does this 968-target include the H25, H26, and Waverley Riding School housing developments in Figure 11 section 4.5, plus 133 new houses built in 2024, thereby requiring 835 new houses?

Additionally, I am seeking clarification on the amount of land needed to accommodate the aforementioned housing requirements. Is it anticipated that this development will be concentrated in a single area, or spread across multiple locations in Cubbington?

I am particularly concerned about the land proposed for development as part of the call for land, as it is all Green Belt. I strongly believe that our Green Belt areas should remain protected to prevent urban expansion, which is why they are designated as "Green Belt."

Section 5 of the Neighbourhood Plan Policies, CNDP2, addresses the protection of other green spaces and Table 2, Local Green Space Assessment. It worries me that these areas are only recommended for protection under a light policy, rather than being as vigorously protected as in CNDP1, which could potentially lead to future development on these lands. The comments in Table 2 clearly show that residents support the protection of green spaces, with Site 97 (Glebe Farm), Mill Lan (The Nob), and North and South Cubbington Woods being particularly important for Cubbington and the surrounding area.

Site 97 Glebe Farm specifically raises concerns, as it is identified for Housing/Residential on the interactive map. If this land were to be developed, it would have disastrous consequences for the local area, environment, farming, and community.

This site faces several challenges:

- It is Green Belt land.
- It is significant agricultural farmland.
- It boasts natural beauty with rolling hills and views across fields to the woods. (Appendix 4 - Protecting Green Spaces - Views & Vistas - Cubbington. V6 - Views - Offchurch Lane - Public Footpath towards Offchurch River Leam - Newbold Comyn, and V7 - Views - Offchurch Lane towards Rugby Road)
- It is a site of multiple public footpaths, as above.
- It provides habitats for wildlife such as foxes, badgers, newts, (Some most likely Protected), and numerous insect, birders and other animal species that rely on these fields, hedges, and trees/woods for survival.
- The uneven landscape poses significant development challenges, adding to the costs.
- There is a substantial risk of flooding due to the sloping landscape and the presence of many natural springs/brooks that contribute to the river Leam.
- Glebe Farm serves as a natural divide between Lillington and Cubbington, building on this land would remove this boundary.
- Access is poor, other than from Offchurch Road between Thwaites and Windmill Hill, significantly impacting local traffic.
- The road network is poor and restricted for high traffic volumes entering Offchurch Road, with narrow and winding roads to the island
- Risk to the school at the top of the hill, with potential increase in traffic, could pose a risk of accidents with children crossing the road.

I would like to gain a better understanding of how Green Belt land will be treated and what the recommendations are for the sites listed in Table 2, particularly Site 97 (Glebe Farm).

Attachments:

Cubbington Neighbourhood Development Plan.docx - <https://warwickdc.oc2.uk/a/s9n9>

87851

Comment

Respondent: George Percy**Summary:**

4.0 Planning Context

Comment re: Emerging Planning Policy – on the 22nd November 2024, Warwick District Council (WDC) and Stratford on Avon District Council (SoADC) published the Regulation 18 'Preferred Options Consultation' paper of the South Warwickshire Local Plan, as part of the Agenda for the Joint Cabinet Committee meeting scheduled for 6pm on 12th December 2024. The decision of the Joint Cabinet Committee will take place after this Neighbourhood Plan consultation period has closed. The Planning Context within the Neighbourhood Plan should be updated to take account of the emerging Local Plan process. Most notably for Cubbington as follows:

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- The Part 1 Green Belt review which identifies the following land parcels around Cubbington as follows:

2

Location Parcel Ref: Overall Assessment to Green Belt

LSP 6 'Moderate Contribution'

LSP7 'Weak Contribution'

CUB1 'Moderate Contribution'

CUB2 'Moderate Contribution'

CUB3 'Moderate Contribution'

- The 'East of Lillington Group' identified as the 'emerging best performing' Strategic Growth Location against the Sustainability Appraisal framework.

Full text:

1.0 Background

No comment

2.0 Cubbington Neighbourhood Development Plan Key Issues, Vision and Objectives

No comment

3.0 Cubbington Neighbourhood Area

Comment re: Figure 4. – The aerial photograph used in Figure 4 of the submission plan is out of date and does not show the impact of the construction of the High Speed Two (HS2) railway line to the east of the Neighbourhood Plan Area. The new railway cuts through a significant proportion of the Neighbourhood Plan Area including 'South Cubbington Wood' and farmland to the east of Cubbington. This is a key feature in the landscape of 'the area today' and should therefore be visible within the photograph used in Figure 4 in order to provide context.

Comment re: History and Development of Cubbington – the context of the development of the HS2 line to the east of the Neighbourhood Plan Area is not included within this section. This development has had a significant impact of the village and is referred to in later sections of the plan. Context should be provided here in respect of this development which has had a significant impact on the landscape to the east of Cubbington; cutting through 'South Cubbington Wood' and the farmland to the east of Cubbington and permanently redirecting public rights of way.

4.0 Planning Context

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- The chosen Spatial Growth Strategy of; 'Sustainable Travel and Economy'
- The identification of the 'Strategic Growth Location; East of Lillington Group' which is within the Neighbourhood Plan Area.
- The Part 1 Green Belt review which identifies the following land parcels around Cubbington as follows:

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Location Parcel Ref: Overall Assessment to Green Belt

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5.0 Neighbourhood Plan Policies

Comment re: Policy CNDP1 – Protecting Local Green Space

The following areas as shown on the Policies Map are within the Green Belt and are therefore already provided strong planning protection. It should be questioned whether any 'additional local benefit' is gained by further designating them as 'Local Green Space':

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- CNDP 1/3 – North Cubbington Wood
- CNDP 1/4 – South Cubbington Wood
- CNDP 1/5 – The Runghills

Comment re: para 5.7 - Open spaces are defined in the Town and Country Planning Act 1990 as; 'any land laid out as public garden, or used for the purposes of public recreation, or land which is a disused burial ground.' It is questionable whether the sites identified in 'Table 2' are within this definition (see further detail below).

Comment re: Policy CNDP2 – Protecting Other Green Spaces

The policy refers to 'other green spaces,' there is no clear definition of what this encompasses. There appears to be confusion between the definition of 'green space' and 'open space.' Item 'b' within the draft policy refers to 'open space' in relation to local environment, amenity and active public recreation use. This is a narrower definition than seems to be implied by the use of the term 'other green space.'

Comment re: para 5.8 The majority of land around Cubbington is within the Green Belt and therefore already has significant planning protection. It is therefore questioned whether draft policy CNDP2 has any real function.

Comment re: para 5.9 this paragraph refers to 'in addition to protecting the two spaces identified under Policy CNDP 1.' There are five areas identified in draft policy CNDP1. This appears to be an error.

Comment re: Table 2. Local Green Space Assessment

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arable crop production. The land is crossed by three public right of way footpaths. All three footpaths have been disrupted and redirected by the construction of HS2. This land, which extends to over 130 acres, is described in Table 2 as 'to be maintained as open green space.' The land is not currently designated as 'open green space' and it is inappropriate to therefore suggest that it should be maintained as such. The reference to site ref: 202 indicates that there is a desire to preclude this land from the emerging Local Plan process which would be inappropriate particularly given the status of Cubbington as a 'Growth Village'. The reference to site 202 in this section of the plan should be removed. All of this land is protected by Green Belt policy and therefore it is not necessary for the Neighbourhood Plan to try and provide further restriction, particularly via Policy CNDP2, which is poorly defined.

Comment re: 'Site 97 South Warwickshire local plan' – The land between Lillington and Cubbington is described as 'open land' in Table 2. It is not clear what the definition of 'open land' is? This land is private farmland in arable crop production. The land is crossed by two public rights of way footpaths. This land does not meet the definition of 'open space' as defined in the Town and Country Planning Act 1990. In total this land extends to over 130 acres. All of this land is protected by Green Belt policy and therefore it is not necessary for the Neighbourhood Plan to try to provide further restriction, particularly via Policy CNDP2, which is poorly defined.

Comment re: Policy CNDP2 – it is not clear what areas of land this draft policy refers to. The areas identified in Table 2 are large and comprise a large proportion of the Neighbourhood Plan area. The majority of these areas are protected by Green Belt policy and therefore it does not seem necessary for Policy CNDP2 to be included within the Plan. Policy CNDP2 should be removed from the plan.

Policy CNDP3 – Sustainable Design and Construction

No Comment

Comment re: Policy CNDP4 – Conserving and Enhancing the Landscape

It is noted that the enhancement of the landscape is likely to be delivered through new development. The degradation of the landscape by HS2 provides opportunity for repair and enhancement if funds can be achieved via new development within the village.

Comment re: Figure 18 – Landscape Sensitivity to Housing Development was published in 2013 and is therefore out of date. In particular, the construction of HS2 has changed the landscape to the east of village. HS2 now provides a clear 'defensible boundary' for development rather than the 'open countryside' referred to in the Inspector's report. The emerging evidence of the South Warwickshire Local Plan should be considered and it is likely that developers will commission suitable evidence to accompany planning applications for consideration against Policy CNDP 4 at the appropriate time. Figure 18 should be deleted.

Policy CNDP 5 – Cubbington Conservation Area

No Comment

4

Policy CNDP 6 – Protection and Enhancement of Community Facilities

Comment re: para 5.36 the desire to protect, enhance and renew community facilities is noted. The delivery of new development will generate planning gain by way of Section 106 contributions and Community Infrastructure Levy (CIL). WDC are a CIL charging authority. The delivery of development will generate capital in order to deliver on policy CNDP 6.

Comment re: Policy CNDP7 – Community Infrastructure

Both land and capital can be provided via the delivery of new development on a site within the village. By working with applicants, the Parish can meet the aspirations of the Neighbourhood Plan. It is likely that some new development within Cubbington will be delivered via emerging local and national planning policies and the Neighbourhood Plan should ensure the necessary infrastructure is delivered to meet the needs of the current residents as well as those of new residents.

Attachments:

Representations.docx - <https://warwickdc.oc2.uk/a/s9nh>

87856

Comment

Respondent: Holly Lake

Summary:

I am a resident on Glebe farm and have lived here over 14 years, in that time I have applied to extend my property into a very modest family home (3 bedrooms and a bathroom upstairs) and to allow a downstairs disabled room for my father [redacted due to personal information] -all of these have been rejected. None of these applications were for financial gain as despite them we have still chose to remain in this property for over 14 years now due to its location and how much we appreciate the land around us. The only amendments we have been able to make in our time here it to reuse the existing dwelling and change its use.

The main reasons cited for our refusal has always gone back to it being close to green belt land and I have been for pre planning advice since having family to see if we can make our living situation better (still only a 3 bedroom house with an upstairs bathroom) but it has always been a firm no due to the desire to protect the openness. Therefore, I am extremely concerned and shocked to read that the land proposed for development as part of the call for land is all Green Belt and in fact very close to home and on green belt land.

In addition to this and even more surprising to me, Site 97 Glebe Farm is identified for Housing/Residential on the interactive map. If this land is to be developed it not only seems completely unfair given the challenges we have had with our proposals I feel developing it to this level of complete excess would also have a horrendous impact for the local area, environment, farming, and community.

I would like to gain a better understanding of how Green Belt land will be treated in the future as it suddenly doesn't seem as protected as it was during my applications and what the recommendations are for Glebe Farm

Full text:

The main reasons cited for our refusal has always gone back to it being close to green belt land and I have been for pre planning advice since having family to see if we can make our living situation better (still only a 3 bedroom house with an upstairs bathroom) but it has always been a firm no due to the desire to protect the openness. Therefore, I am extremely concerned and shocked to read that the land proposed for development as part of the call for land is all Green Belt and in fact very close to home and on green belt land.

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I would like to gain a better understanding of how Green Belt land will be treated in the future as it suddenly doesn't seem as protected as it was during my applications and what the recommendations are for Glebe Farm

Attachments: None

5.0 Neighbourhood Plan Policies

87852

Comment

Respondent: George Percy

Summary:

5.0 Neighbourhood Plan Policies

Comment re: Policy CNDP1 – Protecting Local Green Space

The following areas as shown on the Policies Map are within the Green Belt and are therefore already provided strong planning protection. It should be questioned whether any 'additional local benefit' is gained by further designating them as 'Local Green Space':

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Comment re: Policy CNDP2 – Protecting Other Green Spaces

The policy refers to 'other green spaces,' there is no clear definition of what this encompasses. There appears to be confusion between the definition of 'green space' and 'open space.' Item 'b' within the draft policy refers to 'open space' in relation to local environment, amenity and active public recreation use. This is a narrower definition than seems to be implied by the use of the term 'other green space.'

Comment re: para 5.8 The majority of land around Cubbington is within the Green Belt and therefore already has significant planning protection. It is therefore questioned whether draft policy CNDP2 has any real function.

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Policy CNDP3 – Sustainable Design and Construction

No Comment

Comment re: Policy CNDP4 – Conserving and Enhancing the Landscape

It is noted that the enhancement of the landscape is likely to be delivered through new development. The degradation of the landscape by HS2 provides opportunity for repair and enhancement if funds can be achieved via new development within the village.

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Policy CNDP 5 – Cubbington Conservation Area

No Comment

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No Comment

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Attachments:

Representations.docx - <https://warwickdc.oc2.uk/a/s9nh>

87761

Comment

Respondent: Warwickshire County Council**Summary:**

CNDP Objective 1 – To protect and enhance green spaces - We support the protection of open spaces and river corridors – this could be developed to mention the benefits of open space as flood risk management to retain water. Above ground SuDS could be utilised in open spaces.

Policy CNDP3 –Sustainable Design and Construction Point O - The policy states that all new developments uses existing watercourses and ditches, surface, sustainable drainage systems (SUDS) to hold rainwater in storms. SuDS should be planted with native vegetation to support wildlife. All paving should be semi-permeable to allow run-off to drain away.

If a site is over 1ha or for 10 or more dwellings, it is classed as a major planning application, therefore in line with the National Planning Policy Framework, a site specific Flood Risk Assessment and Surface Water Drainage Strategy must be

submitted to the Lead Local Flood Authority for review.

You could add to your objective a specific point about new developments needing to consider their flood risk and sustainable drainage systems when building on Greenfield and brownfield sites, as supported by the Sustainable drainage

systems chapter in the Planning Practise Guidance (PPG). A link has been detailed below:

<https://www.gov.uk/guidance/flood-risk-and-coastal-change#sustainable-drainage-system>

You could include an additional point that encourages new developments to open up any existing culverts on a site providing more open space/green infrastructure for greater amenity and biodiversity; and the creation of new culverts should be kept to a minimum. New culverts will need consent from the LLFA and should be kept to the minimum length

Policy CNDP3 –Sustainable Design and Construction

Point R - The document mentions new developments having appropriate car parking. Whilst wording has been amended and now

states surfaces should be permeable, further consideration may be given to the LLFA's previous comments. Depending on

the size and type of drainage, there is an opportunity to introduce SuDS and adequate treatment for flows, to ensure that discharge/run off flows leaving the car park site do not degrade the quality of accepting water bodies, providing greater amenity.

Full text:

Please see attachment.

Attachments:

WCC FRM NDP Comments R1.pdf - <https://warwickdc.oc2.uk/a/s9nb>

85940

Object

Respondent: Ashberry Strategic Land**Agent:** Marrons**Summary:**

Policy CNDP2 requires clarification.

Clarification as to what 'green spaces' and 'open spaces' are.

Clarification as to what land between the village and HS2 is included to be maintained as open green space. A plan showing the designated area should be provided.

The site at Land East of Coventry Road should not be included in the gap between Cubbington and HS2.

Please therefore review the wording of Policy CNDP2 and Table 2 to clarify which land is to be protected by CNDP2, and please confirm that it excludes land east of Coventry Road for the reasons discussed above.

Full text:**Policy CNDP2 – Protecting Other Green Spaces**

The Draft CNDP includes references that require clarification to avoid ambiguity and potential misinterpretation in relation to Policy CNDP2 and Table 2 (page 27).

CNDP2 only supports development that would result in the loss of other green spaces where equivalent or better provision of provided, or where the open space no longer performs a useful open space function in terms of the local environment, amenity or active recreation. The policy interchanges the use of the words 'green spaces' and 'open spaces', and clarification should be provided as to which applies.

The 'other green spaces' are defined within Table 2. Local Green Space Assessment. The first site listed is called HS2 route but in the comments column it states:

"They would wish all land between the village and the HS2 line to be maintained as open green space within the Parish boundary including sites ref 202 as shown on the South Warwickshire Local Plan."

There is ambiguity as to what land is 'other green space'. It presumably is not the HS2 route listed as that is developed and not green space, but it is unclear what land between the village and HS2 is included. A plan showing these areas would improve the Plan.

If it is intended to include the site east of Coventry Road, Ashberry would resist its designation.

It is our view that land east of Coventry Road is visually and physically distinct from land forming a gap between Cubbington and the HS2 line. The site is contained by existing development, including recent residential schemes to the south and east. These developments have altered the settlement boundary on this side of the village, creating an opportunity for a modest development that infills an area of land without significantly extending the edge of the village outwards.

The site also benefits from clear existing boundaries provided by mature hedgerows and existing infrastructure, offering natural containment from the wider countryside and Green Belt.

It is recognised part of the site is covered by existing allotments. However, within the land available within site 176, there is scope to provide better allotment provision in accordance with the requirements of NPPF paragraph 103 and Local Plan policy HS2.

Please therefore review the wording of Policy CNDP2 and Table 2 to clarify which land is to be protected by CNDP2, and please confirm that it excludes land east of Coventry Road for the reasons discussed above.

Attachments:

Land east of Coventry Road, Cubbington - Red Line Plan.pdf - <https://warwickdc.oc2.uk/a/s9kt>
Cubbington Neighbourhood Plan Representations - Land east of Coventry Road Cubbington.pdf - <https://warwickdc.oc2.uk/a/s9k3>

87756**Comment****Respondent:** Mr Peter Clayton

Summary:

Section 5 of the Neighbourhood Plan Policies, CNDP2, addresses the protection of other green spaces and Table 2, Local Green Space Assessment. It worries me that these areas are only recommended for protection under a light policy, rather than being as vigorously protected as in CNDP1, which could potentially lead to future development on these lands. The comments in Table 2 clearly show that residents support the protection of green spaces, with Site 97 (Glebe Farm), Mill Lan (The Nob), and North and South Cubbington Woods being particularly important for Cubbington and the surrounding area.

Site 97 Glebe Farm specifically raises concerns, as it is identified for Housing/Residential on the interactive map. If this land were to be developed, it would have disastrous consequences for the local area, environment, farming, and community.

This site faces several challenges:

- It is Green Belt land.
- It is significant agricultural farmland.
- It boasts natural beauty with rolling hills and views across fields to the woods. (Appendix 4 - Protecting Green Spaces - Views & Vistas - Cubbington. V6 - Views - Offchurch Lane - Public Footpath towards Offchurch River Leam - Newbold Comyn, and V7 - Views - Offchurch Lane towards Rugby Road)
- It is a site of multiple public footpaths, as above.
- It provides habitats for wildlife such as foxes, badgers, newts, (Some most likely Protected), and numerous insect, birders and other animal species that rely on these fields, hedges, and trees/woods for survival.
- The uneven landscape poses significant development challenges, adding to the costs.
- There is a substantial risk of flooding due to the sloping landscape and the presence of many natural springs/brooks that contribute to the river Leam.
- Glebe Farm serves as a natural divide between Lillington and Cubbington, building on this land would remove this boundary.
- Access is poor, other than from Offchurch Road between Thwaites and Windmill Hill, significantly impacting local traffic.
- The road network is poor and restricted for high traffic volumes entering Offchurch Road, with narrow and winding roads to the island
- Risk to the school at the top of the hill, with potential increase in traffic, could pose a risk of accidents with children crossing the road.

I would like to gain a better understanding of how Green Belt land will be treated and what the recommendations are for the sites listed in Table 2, particularly Site 97 (Glebe Farm).

Full text:

Firstly, it is not entirely clear how many houses are needed in Cubbington to meet the SWLP requirements, nor how much land is required for this purpose. Section 4.5 identifies Cubbington as a growth village, with Policy DS6 Level of Housing Growth setting a district target of 16,776 new homes between 2011 and 2029, with Growth Villages contributing a minimum of 968 new homes. Does this imply that we need to build over 968 houses in Cubbington to meet this target? Moreover, does this 968-target include the H25, H26, and Waverley Riding School housing developments in Figure 11 section 4.5, plus 133 new houses built in 2024, thereby requiring 835 new houses?

Additionally, I am seeking clarification on the amount of land needed to accommodate the aforementioned housing requirements. Is it anticipated that this development will be concentrated in a single area, or spread across multiple locations in Cubbington?

I am particularly concerned about the land proposed for development as part of the call for land, as it is all Green Belt. I strongly believe that our Green Belt areas should remain protected to prevent urban expansion, which is why they are designated as "Green Belt."

Section 5 of the Neighbourhood Plan Policies, CNDP2, addresses the protection of other green spaces and Table 2, Local Green Space Assessment. It worries me that these areas are only recommended for protection under a light policy, rather than being as vigorously protected as in CNDP1, which could potentially lead to future development on these lands. The comments in Table 2 clearly show that residents support the protection of green spaces, with Site 97 (Glebe Farm), Mill Lan (The Nob), and North and South Cubbington Woods being particularly important for Cubbington and the surrounding area.

Site 97 Glebe Farm specifically raises concerns, as it is identified for Housing/Residential on the interactive map. If this land were to be developed, it would have disastrous consequences for the local area, environment, farming, and community.

This site faces several challenges:

- It is Green Belt land.
- It is significant agricultural farmland.
- It boasts natural beauty with rolling hills and views across fields to the woods. (Appendix 4 - Protecting Green Spaces - Views & Vistas - Cubbington. V6 - Views - Offchurch Lane - Public Footpath towards Offchurch River Leam - Newbold Comyn, and V7 - Views - Offchurch Lane towards Rugby Road)
- It is a site of multiple public footpaths, as above.
- It provides habitats for wildlife such as foxes, badgers, newts, (Some most likely Protected), and numerous insect, birders and other animal species that rely on these fields, hedges, and trees/woods for survival.
- The uneven landscape poses significant development challenges, adding to the costs.
- There is a substantial risk of flooding due to the sloping landscape and the presence of many natural springs/brooks that contribute to the river Leam.
- Glebe Farm serves as a natural divide between Lillington and Cubbington, building on this land would remove this boundary.
- Access is poor, other than from Offchurch Road between Thwaites and Windmill Hill, significantly impacting local traffic.
- The road network is poor and restricted for high traffic volumes entering Offchurch Road, with narrow and winding roads to the island
- Risk to the school at the top of the hill, with potential increase in traffic, could pose a risk of accidents with children crossing the road.

I would like to gain a better understanding of how Green Belt land will be treated and what the recommendations are for the sites listed in Table 2, particularly Site 97 (Glebe Farm).

Attachments:

Cubbington Neighbourhood Development Plan.docx - <https://warwickdc.oc2.uk/a/s9n9>

Appendices

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Comment

Respondent: Warwickshire County Council

Summary:

Appendix 5 - We note that this policy lacks specific reference to surface water flood risk and development drainage apart from

Appendix 5. We strongly recommend consideration of the below points:

You could develop this point to include the SuDS hierarchy. The hierarchy is a list of preferred drainage options that the LLFA refer to when reviewing planning applications. The preferred options are (in order of preference): infiltration (water into the ground), discharging into an existing water body and discharging into a surface water sewer. Connecting to a combined sewer system is not suitable and not favourable.

In this section it would be good to mention that all above ground attenuation features should be designed to be multifunctional and consider the four pillars of SuDS which are water quality, water quantity, amenity and biodiversity. A comment could be included to say all developments will be expected to include sustainable drainage systems and that new developments need to consider their flood risk when building on Greenfield and brownfield sites, as supported by the Sustainable drainage systems chapter in the Planning Practise Guidance (PPG). A link has been detailed below:

<https://www.gov.uk/guidance/flood-risk-and-coastal-change#sustainable-drainage-systems>

You have included references to the NPPF and Core Strategy Policies. WCC FRM have their own Local Guidance for Developers which may be worth including in the reference documents. A link has been detailed below:

<https://api.warwickshire.gov.uk/documents/WCCC-1039-95>

Full text:

Please see attachment.

Attachments:

WCC FRM NDP Comments R1.pdf - <https://warwickdc.oc2.uk/a/s9nb>