

Notes from Neighbourhood Plan Steering Group meeting on 18th Sept 2019 at O Aries House

Present

Cllr Brian Friar, Olly Aries, Judy Steele, Barbara Wyatt, Ed Coombs.

Key Notes

- The meeting comprised a review of all of the comments received from Regulation 14. These were projected onto a screen and debated. All actions and comments made at the meeting were directly input into the comments register. This document is attached below (**Action All**)
- It was agreed that the register of comments should be sent to Kirkwells for their professional input. (**Action BFr**).
- NP Report to be updated (**Action All**)

Date of Next Meeting:

7th November 9.30am. To review all feedback from Reg 14 consultation + Kirkwells

Notes prepared by Oliver Aries.
20th September 2019

Regulation 14 Comments Register

No.	Respondent	Response	NP Committee Action
1	Johnathan and Pippa	<p>(1) We should incorporate a planning statement in support of alternative energy, particularly public electric car charging points. In the future, without these, we are only going to increase pressure on kerbside parking for the many houses without drives. Would suggest partnership with White Lion and Village Shops to install these. We should also as a village have a stated position on, for example, solar fields and windmills. This is an issue that is coming and this plan should be prepared for that. Personally I am in favour of maximising these opportunities within the village wherever possible, but we need to look at potential sites.</p> <p>(2) I do think we need to look at opening the viaduct for walks. I understand that Henry is against this on safety grounds, but we strongly disagree. There is at least one alternative former rail viaduct in walking distance of the village that is completely open for walking - and there are countless parts of our coastline that are open for walkers which present significantly greater risks. I think we are missing a trick by not opening this much loved heritage asset as part of the walking infrastructure we enjoy around the village. It should be integrated and not bypassed.</p> <p>(3) Thank you - there is clearly much work that has gone into this document, it shows and is very welcome.</p>	<p>Amend Plan to Include general & supportive statements for electric vehicles and associated infrastructure. (Completed)</p> <p>Viaduct is private property. Owner does not want to open to public as there could be a Health & Safety risk which is out of their control.</p>
2	Andrew Jones	<p>With building ever encroaching on rural locations, I strongly support the suggested green spaces in the Neighbourhood Plan.</p>	<p>Plan already accommodates comment.</p>

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		All heritage assets should be protected when determining future locations for development. This is essential for present and future residents of the village.	
3	Andrew Jones	The area of separation between Radford Semele and Leamington Spa (Sydenham) is essential in order to preserve the character of the Village. I support the prohibition of building on the area of separation	Plan already accommodates comment.
4	Craig Maloney	We purchased a new Bovis Home some 2.5 years ago but feel very much isolated from the local Radford Semele Community. The busy Southam Road with it's blind corners is unsafe for the elderly and children to cross safely and as a consequence, we do not make use of any of the local amenities and instead, drive into Leamington. The recent increase (yes, increase) in the speed limit from 30mph to 40mph at the entrance/exit to the Bovis estate has caused increased problems in exiting safely. Drivers now accelerate up the hill on a blind bend as they exit the 30mph zones and into the newly increased 40mph zone, whilst traffic heading down the hill rarely slows, making every exit somewhat precarious. Invariably, I have motorists flashing and waving at me as I exit the estate despite there being sufficient clearance if they were complying with the speed limit.	Note: 30mph limit was a temporary limit whilst construction was taking place. WDC Highways assessed for a 40mph limit. Outside scope of NDP. No further changes to Plan needed.
5	Nicola Pease	Very supportive of the objectives and policies in the plan.	General Support. No action required.
6	Jane Surrige	Supportive of whole plan - no comments made.	General Support. No action required.
7	Cath Sandhu	I agree with it all	General Support. No action required.

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8	Laura & Jon Handford	Supportive of plan policy 14 - no comments made.	General Support.
9	Mrs J Cooley	<p>I support the idea of another pedestrian crossing somewhere along the now much more elongated village. there is also an argument for 20 mph through the most populated part of the main road.</p> <p>Traffic management in School Lane is already out of control in School Lane at school drop-off and pick-up times. When the building at the end of Spring Lane is finally in full swing, serious consideration must be given how the many lorries, which will also have to use the road, will be managed. To do nothing will result, almost certainly, in injuries. As it is, the older children who walk to school unaccompanied are in some danger from the inconsiderate parking.</p> <p>I support the idea of building space being earmarked for a doctor's surgery, especially as there seems to be a move in Leamington to consolidate provision. This may well result in future residents being refused registration at current provision.</p> <p>The same comment may be made for the school.</p>	<p>Pedestrian crossing already in Plan.</p> <p>20mph limit a matter for Highways but very unlikely on a major trunk road.</p> <p>Supportive of traffic measures but outside scope of plan. General measures already in Plan. No action required.</p> <p>Other comments already in Plan.</p>
10	Linda Simons	<p>Could I ask that consideration is given to mobility around the village for pushchairs/wheelchairs and similar with appropriately and safely positioned dropped kerbs - especially to ease access to village facilities.</p> <p>Thank you for this all-encompassing Plan to protect our lovely village.</p>	Reference now included in RS8.
11	Bob Crowther	We strongly support improvements for pedestrians, in particular RS8 b) iv) improved footpath links to Leamington Spa. Champion School is the preference area secondary school for Radford Semele youngsters, and we are anxious that our pupils have safe routes to walk to school. In	General Support. No action taken

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		view of the narrow section of footpath along part of the busy Radford Road / Southam Road parents have justifiable concerns for their children's safety and many choose to ferry them by car instead. Safe walking (or cycling) instead would be beneficial to the children's health and developing independence as well as being beneficial to the environment.	
12	Andrew Dealtry	RS8/4 refers to the disused railway viaduct over the canal above Radford bottom lock. It is essential that the viaduct is opened for walkers and cyclists providing access from Offchurch Lane to the Greenway(cycle route 41) and on to Offchurch. Currently walkers are using the canal locks to gain access to the canal path/Greenway. This is dangerous. The alternative walking down Offchurch Lane to the canal is extremely dangerous, almost suicidal. On safety grounds and benefit to the community this is a real requirement.	Committee supports the overriding need for a connection between Offchurch Lane and the Canal/Greenway. Aware of route currently taken via a private path. Owner has refused use of viaduct. Further discussion outside scope of NDP. No action taken.
13	Steve Wood	congratulations on this plan which must have been quite a challenge to get to this stage. We endorse your plan and hope WDC & WCC do the same and keep to their word when it comes to further "not needed" housing development requests in the village in or just outside the envelope. Radford Semele is a unique village and should remain so for our next generations.	General Support. No action required.
14	Barbara Wyatt	Within the village boundary there is little space for any further building or green spaces. Most green space is found outside the village and is	As per 12. Owner against use of footpath

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		<p>agricultural in nature. There is a permissive path running along the disused rail from Offchurch lane to the Viaduct, which, with the wooded area adjacent, would be a valuable green space. I would like to see this incorporated into the plan.</p> <p>I note that, although the Radford Semele part of the canal corridor is included in the recently published development plan for the Warwick District Canal Conservation Area Plan, no special arrangements are suggested to preserve the facility in the RSNPD. AS it offers such a wide range of habitats and is so heavily used for recreation and other activities, it could be made a Green Space.</p>	<p>and he has declared viaduct a safety hazard.</p> <p>Mentioned in the plan. Conservation area is a WDC responsibility.</p>
15	Gareth Wyatt	<p>I think that the archaeological and heritage sites in the parish need strong protection to prevent the sites being lost to developers.</p> <p>I support the designated area of separation and hope it will prevent the absorption of Radford Semele into Leamington or Whitnash</p>	General Support. No action required.
16	steverandall29@sky.com	<p>The neighbourhood plan is very comprehensive and I'm fully supportive of it. I wish to make comments as noted in the additional comments section, I appreciate that some comments are already contained within the plan but feel it's important to add my support to these specific issues.</p> <p>If further developments are allowed to take, there should be the following stipulations. Inclusion of swift bricks, all gardens should include hedgehog highways i.e specially designed gravel boards. Retention and</p>	Included within Plan in the wider sense

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		enhancement of all existing hedgerows and replanting of at least the same number of trees as have to be cut down	
17	Mike Jarrett	<p>Policy RS2 of the draft Neighbourhood Plan seeks to designate land at Leighfoss as Local Green Space.</p> <p>A Local Green Space Designation is a way to provide special protection against development for green areas of particular importance to local communities.</p> <p>Notwithstanding that the landowner was not notified by the Parish Council of the intention to designate the land at Leighfoss, in order to be designated as Local Green Space the site must satisfy the criteria set out in Paragraph 100 of the National Planning Policy Framework (NPPF), and thus be:</p> <ul style="list-style-type: none"> a) In reasonably close proximity to the community it serves; b) Demonstrably special to a local community and hold particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife; and c) Local in character and not an exhaustive tract of land. <p>Appendix 1 of the draft Neighbourhood Plan sets out the reasons why the land at Leighfoss is considered to be demonstrably special to the local community. These are:</p> <ul style="list-style-type: none"> a) The use by the local community of a permissive footpath on the site; 	<p>Green Spaces reviewed again with particular reference to align NDP's Appendix 1 and written text to requirements of Paragraph 100 of NPPF. Particularly with reference to "richness of its wildlife". In addition a general look at reinforcing reasons for nominating Green Spaces.</p> <p>Green Spaces allocation deemed justified.</p>

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		<p>b) The presence of protected species (Great Crested Newts and Grass Snakes);</p> <p>c) The presence of mature trees and hedges around the site boundary; and</p> <p>d) The ecological value of ruderal grassland on the site.</p> <p>The permissive footpath runs alongside the northern edge of the site, and is fenced off from the main field to the south. Its use by the local community is therefore distinct from and wholly unrelated to the balance of the site, which is afforded no community access. Furthermore, as confirmed in Appendix 7 to the draft Neighbourhood Plan, an application has already been made to the County Council to designate this route as a Public Right of Way, which will then preserve community access through the site to The Valley. Consequently, the justification for designating the whole of the site as Local Green Space in order to preserve community access along the permissive footpath will no longer exist and, on that basis, the proposed Local Green Space designation is considered to be both unnecessary and excessive.</p> <p>The presence alone of protected species or valuable habitat is not one of the criteria set out in paragraph 100 of the NPPF for designating Local Green Space, and does not, therefore, provide sufficient justification for designating the land at Leighfoss as such. There are likely to be many other sites in and around Radford Semele where protected species and valuable habitat are also present, yet these are not proposed to be designated as Local Green Space, and the draft Neighbourhood Plan does not provide any evidence as to why this particular site is</p>	

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		<p>“demonstrably special to a local community and hold[s] particular local significance” as a consequence of the protected species and valuable habitat being present.</p> <p>Similarly, the mere presence of mature trees and hedges on the boundaries of the land at Leighfoss is by no means a unique characteristic within the context of a rural location such as this. The draft Neighbourhood Plan therefore does not adequately evidence why the presence of the trees and hedges on this particular site make it “demonstrably special to a local community and hold particular local significance”. Furthermore, it is notable that the designation of the site as Local Green Space provides no specific protection for the existing trees and hedges, and is therefore entirely unnecessary in that respect.</p> <p>We therefore object to the proposed designation of the land at Leighfoss in Policy RS2 on the grounds that the draft Neighbourhood Plan has not demonstrated that the site is special to the local community, and therefore fails to satisfy the criteria for designation of Local Green Space set out in Paragraph 100 of the NPPF.</p> <p>Accordingly, the proposed Local Green Space designation at Leighfoss should be deleted from Policy RS2.</p> <p>In order to be put to a referendum and then be ‘made’ a Neighbourhood Plan must first meet the basic conditions set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended).</p>	

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		<p>As such, it must, inter alia:</p> <ul style="list-style-type: none"> a) Have regard to national policies and guidance issued by the Secretary of State; b) Contribute to the achievement of sustainable development; and c) Be in general conformity with the strategic policies contained in the development plan. <p>The Government’s objective of significantly boosting the supply of homes is clearly identified in Paragraph 59 of the National Planning Policy Framework (NPPF), and Planning Practice Guidance states that neighbourhood plans “must not constrain the delivery of important national policy objectives”.</p> <p>Paragraph 78 of the NPPF states that: “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive...”</p> <p>Consistent with these aims, Strategic Policy DS4 of the Warwick District Local Plan (WDLP) 2011-2029 (adopted September 2017) details the Council’s Spatial Strategy. This “focuses growth within and adjacent to built-up areas” including in designated ‘Growth Villages’.</p> <p>Radford Semele is defined as a Growth Village in the WDLP. These have been “assessed as being the most sustainable rural settlements</p>	

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		<p>according to a range of sustainability indicators” (WDLP, Paragraph 2.37).</p> <p>Furthermore, it is acknowledged in the WDLP that focusing rural housing development in these locations “will provide the opportunity for newly-forming households to stay in the area and for existing households to move house as their circumstances change” (WDLP, Paragraph 4.7). It also “provides an opportunity to assist in re-balancing the local housing markets..., much-needed affordable housing and market homes for local residents”, as well as “other positive benefits such as helping to support and sustain local services, facilities and businesses” (WDLP, Paragraph 2.38).</p> <p>Therefore, although the WDLP does not currently allocate housing sites in Radford Semele, the village is clearly a sustainable location, and likely to be a focus for future housing growth when the WDLP is next reviewed.</p> <p>This is important because Paragraph 99 of the NPPF states that: “Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.”</p> <p>Paragraph 33 of the NPPF states that “policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary”. Moreover, Strategic Policy DS19 of the WDLP commits the Council to “a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data before 31st</p>	

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		<p>March 2021 to assess whether a full or partial review of the Plan is required”.</p> <p>It is therefore very possible that there will be a review of the WDLP within the next 2 years, particularly if the local housing need figure has changed significantly. This would require the preparation of a Strategic Housing Land Availability Assessment to inform the identification of a sufficient supply and mix of housing sites, and the resulting spatial strategy will likely look, once again, to the designated Growth Villages to meet a significant portion of the identified housing need.</p> <p>The proposed Local Green Space designation at Leighfoss will pre-judge the outcome of any future review of the WDLP, and prejudice the contribution that this site could potentially make towards meeting future housing needs.</p> <p>Furthermore, on the basis that the draft Neighbourhood Plan has not satisfactorily demonstrated that the land at Leighfoss is “demonstrably special to a local community and hold particular local significance” (refer to separate objection), the proposed Local Green Space designation could be interpreted as an attempt to simply frustrate sustainable development on this site, which could then lead to development being displaced to other, less sustainable, locations.</p> <p>We therefore consider that Policy RS2, and specifically the designation of Local Green Space at Leighfoss, runs counter to national policy, and fails to support the achievement of sustainable development consistent</p>	

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		<p>with the Spatial Strategy for the District.</p> <p>For these reasons, we consider that the proposed Local Green Space designation at Leighfoss does not satisfy the basic conditions set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.</p> <p>Accordingly, the proposed Local Green Space designation at Leighfoss should be deleted from Policy RS2, if the Neighbourhood Plan is to be put to a referendum and then be 'made'.</p>	
18	Mr. Mike Holland	Supportive of plan policy RS2 no comments made.	General Support. No action required.
19	Mike Holland	Supportive of plan policy RS3 no comments made.	"
20	Mike Holland	Supportive of plan policy RS4 - Play areas need to be maintained and monitored to ensure they do not become areas for anti-social behaviour	"
21	Mike Holland	Supportive of plan policy RS5 - Essential to village life	"
22	Mike Holland	Supportive of plan policy RS6 no comments made.	"
23	Mike Holland	Supportive of plan policy RS7 no comments made.	"
24	Mike Holland	Supportive of plan policy RS8 - As a resident of Semele Park feel isolated and separate from the village. Pedestrian and cycle access is treacherous due to the lack of decent footpaths to the village amenities. The speed of traffic and narrow footpaths is a concern as a regular walker through the village. I would say this should be the no.1 priority before there is a serious incident on the road.	Plan updated to include reference to isolation and traffic issues of Semele Park.

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25	Mike Holland	Supportive of plan policy RS9 no comments made.	General Support. No action required.
26	Mike Holland	Supportive of plan policy RS10 - Would like 30 speed limit extended past entrance to Semele Park as it is difficult to enter/exit safely due to speed of traffic entering and leaving the village. Also need further traffic calming within village to slow traffic. Lewis Road/Offchurch lane junction is also very difficult to negotiate due to speeding traffic. Would like to see enforcement cameras or mobile camera operations to deter regular speeders/commuters who exceed the speed limits. Could a 20mph limit be considered perhaps?	Comment already provided. No Action
27	Mike Holland	Supportive of plan policy RS11 - Agree local businesses of all kinds should be encouraged, not only retail outlets.	General Support. No action required.
28	Mike Holland	Supportive of plan policy RS12 - Strongly support - main reason for moving to the village	General Support. No action required.
29	Mike Holland	Supportive of plan policy RS13 no comments made.	General Support. No action required.
30	Mike Holland	Supportive of plan policy RS1 no comments made.	General Support. No action required.
31	JUDY STEELE on behalf Canalside Community Foods	Canalside Community Food fully supports the idea of a footpath link to the village. There is no safe footpath, but the site is used by many families.	General Support. No action required.
32	Judy Steele	We are a divided village and desperately need a safe crossing point to link Semele Park and the Jitty footpath from Offchurch Lane to Lewis Road and the village facilities. I had to sprint across the road yesterday	Already delt with of previous similar comment.
33	Dave Steele	I am in support of the key aims and objectives of the Neighbourhood Plan	General Support. No action required.

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		<p>Specifically:</p> <p>OBJECTIVE 2: To protect and enhance local green spaces. (Policies RS2, RS3)</p> <p>RS8/4 Proposal to re-open the viaduct to provide a continuous safe footpath/cycle link from the village via the permissive path from Offchurch Lane to The Greenway / National Cycle Route 41,</p> <p>4.15 volume and excessive speed of traffic in the village;</p> <p>OBJECTIVE 5: To minimise the impact of road traffic and improve opportunities for walking and cycling (Policies RS8, RS9 and RS10)</p>	
34	Judy Steele	Traffic management is not just important for the safety and enjoyment of residents. It's also important that frequent public transport and safe walking and cycling routes are improved as a means of reducing car use and helping to tackle the climate emergency which the local councils have declared.	Already in NDP. General Support. No action required.
35	Judy Steele	Supportive of plan policy RS7 no comments made.	General Support. No action required.
36	Dave Steele	Support RS10 [Transport]	General Support. No action required.
37	Dave Steele	RS8/4 Proposal to re-open the viaduct to provide a continuous safe footpath/cycle link from the village via the permissive path from Offchurch Lane	Already dealt with previous comment. No action required.

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		to The Greenway / National Cycle Route 41,	
38	Paul Mayman	I agree completely with the Neighbourhood Plan, particularly the footpath from Offchurch Lane to link with the footpath to Offchurch. Good luck with that.	General Support. No action required.
39	Lorna Tallowin	<p>As a new mum a circular village walk which is pram friendly and a link to the canal would make a big difference to my well being.</p> <p>In October 2018, the IPCC Intergovernmental Panel on Climate Change presented a special report on the state of global warming, which warned of the rapid and far reaching consequences of over 1.5 °C of warming on all aspects of society.</p> <p>In June 2019 Warwick District Council unanimously agreed to declare a 'climate emergency'. The Council recognises the importance of this report and passed a motion to facilitating decarbonisation by local businesses, other organisations and residents so that total carbon emissions within Warwick District are as close to zero as possible by 2030. The Council will within six months publish an action plan to implement these commitments.</p> <p>My suggestion is that any new developments and new businesses must be considered in view of a "climate emergency" and the councils new commitment to zero carbon emissions by 2030. In order to ensure that our village is part of the solution I would like to see the words "Climate emergency" included in the document. This would outline the context in which this plan was finalised and give guidance to developers. There</p>	<p>Already being considered and dealt with in NDP. No action required.</p> <p>A reference to climate change included in NDP.</p> <p>"Climate Emergency" has been added into RS1.</p>

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		<p>should be some indication as to how new developments can support the council to achieve zero carbon by 2030. This could include; new housing projects required to include solar with storage or air/ground sourced heating, or other renewable options; All new housing projects required to include adequate insulation; All landlords required to meet energy efficiency D standard as a minimum; All new developments to be cycle and walking friendly.</p>	
40	Helen James	<p>Support RS8.</p> <p>Particularly pleased to see the support here for making safe access for bus stop users and Semele Park residents to access the rest of the village, and to develop footpaths to improve access to the countryside/ canal.</p>	General Support. No action required.
41	Michael Galliford	<p>Firstly, may I say thank you to the team that has drafted the Radford Semele Neighbourhood plan. Clearly a lot of time effort has gone into drafting such a quality document.</p> <p>In terms of feedback I have three points I would like to make.</p> <ul style="list-style-type: none"> • I wholeheartedly agree with all the objectives and planning policies detailed in the document. Furthermore, RS12 is an extremely important policy and it is crucial that the area of separation between Radford and Leamington, Sydenham and Whitnash be maintained. Without the area of separation the village will quickly lose its individual nature and identity • In relation to policies RS 8 and RS 10 (not sure which this should apply 	General Support. No action required.

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		<p>to), whilst I agree with all the improvements I feel they miss very one important issue.</p> <p>The development of land east of Radford where 210 dwellings will eventually be built. The development will have a good proportion of school children either trying to access the village school or catch a bus to secondary school. As has already been pointed out the A425 is busy so I believe these children and other residents are likely to access the school and transport links by exiting north of the development onto Offchurch lane, which will need to be crossed. The crossing point (at the emergency access to the development) will be within the village but close to a brow of a hill where cars frequently speed into the village – I have nearly been run over there myself. My concern is that with this new pedestrian flow it will only be a matter of time before an accident occurs. I think the plan should support some sort of traffic calming or warning signs for the “new” crossing.</p> <ul style="list-style-type: none"> • A very minor point. I think the following should be changed to add the word “Appendix 2” after “given in” rather than have a second line. <p>Policy RS3 – Protecting Small.....</p> <p>Details on the assessment of each of the small open spaces is given in</p> <p>Details provided in Appendix 2</p>	<p>Changes made</p>

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42	Tony Tudge	<p>I support the idea of extending a cycle lane between RS and Leamington, but wish to make the point that painted cycle lanes can be more dangerous to cyclists as motorists can use the line as a space separator and so give less room than when no line exists.</p> <p>The traffic island opposite Kingshurst has no footpath one side and seems to serve no use. Either a footpath to the bus stop should be added or the island removed to remove a traffic pinch point which affects eastbound cyclists</p>	<p>Point included in plan.</p> <p>Matter for Highways. Noted</p>
43	Mr R Todd, Interlocks Surveys Limited	<p>Mr R Todd, of Interlocks Surveys Limited, owns and occupies St Andrews House for business purposes. The premises comprise a building, originally erected as a Parochial Hall, together with an extensive area for car parking and turning. In addition, the ownership includes an area of grass between the car park and the road known as Hallfields. This grassed area, which is fenced off from the car park, contains a few shrubby trees and bushes and is of no special amenity or ecological significance.</p> <p>However, the Regulation 14 draft Neighbourhood Development Plan (NDP) proposes to include the grassed area as an open space to be protected under Policy RS3 of the NDP (RS3/12). RS3/12 covers two small areas of land and the justification given in Appendix 2 of the draft NDP is that the two areas provide a green 'lung', are of beauty, and have trees and recreational value. The comment is made that the areas add a pleasant aspect to the A425 as it narrow, and are used by children's societies for environmental activities.</p>	<p>Committee decided that they agree that there is probably little background to fully support St Andrews House as a NDHA. In the light of these comments this will be removed from the list of NDHA.</p> <p>Regarding the area of green space outside the fence line towards Hallfields. This does align with the policy for small open spaces</p>

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		<p>Objection is raised to the inclusion of that small area of grass between the car park of St Andrews House and Hallfields, which is in the ownership of Mr R Todd.</p> <p>The justification given in Appendix 2 of the draft NDP is that “every green space, however small, within the village is (therefore) very important in helping maintain its openness, of vital importance to the population. The gradual development of the village over time has not left much open space, so that which there is, is of special significance and should be retained.”</p> <p>Evidently however this blanket approach to the possible designation of areas of open space throughout the village fails to apply a rigorous and robust assessment which is required by national planning guidance before land is identified as warranting special protection beyond normal development management considerations. There is no evidence in the draft NDP that the particular parcel of land is ‘very’ important in helping to maintain the openness of the village, or that it is of ‘vital’ importance to the population.</p> <p>Furthermore, there is no evidence that the parcel of land is of ‘special significance’ to warrant additional protection. In this respect, the attributes given to the land in Appendix 2 of the draft NDP cannot be supported:</p> <ul style="list-style-type: none"> • the land does act as a green lung and is little more than a small piece of land left over following the development of Hallfields; 	<p>and therefore should be kept in the Plan. It doesn’t preclude development but is a community wish to remain as is and in keeping with its surroundings. No action required.</p> <p>Small green spaces has been applied to all small green spaces in the village irrespective of ownership To remove one and keep others would weaken the policy. The inclusion of this land is therefore important.. Any planning application on this land would have to meet planning department policies in any event.</p>

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		<ul style="list-style-type: none"> • it is of no special beauty nor of high visual amenity; • there are a few trees but these are not good specimens and are not of any significance in terms of visual amenity; and • the land is in private ownership and should not be used for public recreation or considered as being otherwise accessible by the general public. <p>In conclusion the proposed identification of the land as open space is not justified and results in the draft NDP failing to comply with the Basic Conditions. The land to which this objection refers should be omitted from Policy RS3. There should be consequential revisions to the relevant maps in the draft NDP.</p> <p>Mr R Todd, of Interlocks Surveys Limited, owns and occupies St Andrews House for business purposes. The premises comprise a building, originally erected as a Parochial Hall, together with an extensive area for car parking and turning.</p> <p>Mr Todd objects to the proposal in the Regulation 14 draft Neighbourhood Development Plan (NDP) to designate St Andrews House as a non-designated heritage asset under Policy RS7 (RS7/16). There is no justification for such identification which fails to meet national planning guidance and the adopted Warwick District Local Plan.</p> <p>The National Planning Policy Framework (NPPF) allows for the identification of non-designated heritage assets and requires the effect of an application on the significance on such an asset to be taken into</p>	<p>Property has been removed from the NDHA list even though it has negligible effect on any future planning application.</p>

No.	Respondent	Response	NP Committee Action
		<p>account in determining the application.</p> <p>The glossary to the NPPF, as supplemented by the national Planning Practice Guidance (PPG) describe non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets. The PPG (Paragraph: 039 Reference ID: 18a-039-20190723) notes that a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.</p> <p>The PPG (Paragraph: 040 Reference ID: 18a-040-20190723) continues to advise there are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. However, irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.</p> <p>Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developers and decision-makers. This includes information on the criteria used to select non-designated heritage assets and information about the location of existing assets.</p>	

No.	Respondent	Response	NP Committee Action
		<p>The draft NDP fails to meet the above guidance and lacks any evidence, sound or otherwise, that St Andrews House is worthy of being identified as a non-designated heritage asset. Indeed the 'Justifications' column in Table A4 is blank, as is the 'WDC Category & Criteria' column.</p> <p>With regard to the categories used by WDC for a building to fall within Category 1 it has to be of architectural, aesthetic, and artistic merit; or of historic merit, or have landmark status. St Andrews House has none of these characteristics or attributes.</p> <p>For a building to fall in Category 2 it has to be of significant age and integrity; or display rarity or representativeness; or be of high value as a community and social asset. Once again St Andrews House does not have any of these characteristics and attributes.</p> <p>Having regard to the above there can be no justification for St Andrews House to be designated as a non-designated heritage asset. The proposed identification is not justified and results in the draft NDP failing to comply with the Basic Conditions.</p> <p>In conclusion St Andrews House should be removed from Policy RS7 and from Table A4. There should be consequential revisions to the relevant maps in the draft NDP.</p>	<p>The committee disagrees with this comment.</p> <p>The Committee disagrees with this comment as the building has been around for a considerable age.</p>
44	Ian Dickinson	<p>The Canal & River Trust (the Trust) is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding.</p>	

No.	Respondent	Response	NP Committee Action
		<p>The Trust has a range of charitable objects including:</p> <ul style="list-style-type: none"> • To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment; • To protect and conserve objects and buildings of heritage interest; • To further the conservation, protection and improvement of the natural environment of inland waterways; and • To promote sustainable development in the vicinity of any inland waterways for the benefit of the public. <p>Within Radford Semele Parish the Trust owns and operates some 2.6km of the Grand Union Canal which skirts the northern edge of the Plan area. The canal is an important heritage asset and wildlife corridor and is designated as a conservation area as well as a County Wildlife Site. Within the Plan area there are 3 bridges, 1 former railway viaduct and 3 locks. The canal towpath forms part of National Cycle Route 41.</p> <p>The canal forms an important part of the landscape within the Plan area and contributes significantly to its character, both providing a reminder of the industrial heritage of the area and a valuable green infrastructure corridor and wildlife habitat. The Trust is therefore pleased to note that the importance of the canal as a feature to be retained is highlighted in criterion b) of Policy RS6. We suggest that criterion b) could be amended to specifically seek to protect, as well as retain, the features identified.</p> <p>The Grand Union Canal within the Plan area is designated as a conservation area, and thus has protection as a designated heritage</p>	<p>RS6 policy amended accordingly.</p> <p>Agree but this is a WDC Conservation</p>

No.	Respondent	Response	NP Committee Action
		asset. Particular features within the canal conservation area, such as bridges, locks and the former railway viaduct, could potentially be considered for inclusion within Policy RS7 as valuable non-designated heritage assets to achieve further protection.	area. The Radford Locks and bridge is outside the Designated Area.
45	Alexander Dempsey	As a resident whose house is on Southam Road, I can only support any action that reduces the SPEED of cars travelling both up the hill from Leamington, around the corner at Kingshurst towards Leamington and through the village more generally. The increased VOLUME of traffic is regrettably understandable due to the road being a major trunk route and the increase of housing numbers in the village, Southam and surrounding areas. Often it can take minutes to safely exit our driveway onto the road. The volume is difficult to reduce currently but the SPEED of the cars can be more easily addressed. The flashing 30 signs seem to have no effect on drivers who have to brake heavily upon seeing vehicles emerging from the many concealed driveways - if they were travelling at 30mph they wouldn't have to. I assess (I have experience in this skill) that most vehicles are travelling well in excess of 30mph especially where a stream of traffic has it's speed is set by the first car. Occurring at all times of the day, I have commonly witnessed vehicles travelling in excess of 40mph, many over 50mph. They have to brake heavily to navigate the left hand bend at Kingshurst or to avoid a collision coming the other way as cars exit driveways and side roads. It is a miracle that there hasn't been a serious accident for sometime, especially as speeding vehicles include buses and trucks - there have been minor accidents due to cars turning right into side roads and cars going too fast to stop behind them. I predict that if the local traffic police were to set up a speed trap, they would see	Already aligns with NDP. No action required.

No.	Respondent	Response	NP Committee Action
		<p>a monumental increase in revenue! It'd be like shooting rats in a barrel! If the local authority are serious about supporting this neighbourhood plan (which is extremely well written and well detailed) then addressing the speed of vehicles through the village would make us all safer, improve air quality and increase the harmony of village life, bringing the north and south closer together.</p>	
46	Gary Mark Stocker	<p>I agree with what is being said and it has picked up on everything which I can think of and a bit more! What I most agree with is that green spaces should be preserved as much as possible: hedges in particular should be kept as far as practical. Offchurch is in walking distance, however I normally use the car because it is too dangerous to walk. So some kind of provision for pedestrians to cross the canal bridge safely would be good. I have noticed that the community spirit has declined over the years. So something to arrest that would be good. The White Lion used to be a hub of the community, but successive "management" there has not encouraged that. Some information boards on buildings of historic interest are a good idea, with the permission of the owners! So yes, I agree with what is being said.</p>	General Support. No action required.
47	Annie	<p>Can we please tackle the speeding problems in Lewis Road, by creating several speed bumps. This will prevent further pets and wildlife being unnecessarily killed, and prevent Children being put at risk. I have had one of my pets killed and so have several neighbours. I have contacted the local Police and managed to get signs installed, but this is not proving successful enough. I urge to PLEASE action this. I would also suggest that at the end of Lewis Road and Southam where it curves, that a Pedestrian Crossing and Speed Camera be put in place. Again to prevent the speeding, which occurs at all times of the day, and night.</p>	NDP supports this area. Matter for Highways and police.

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		<p>Can we please preserve our green land and spaces, and NOT build any more housing. I would also urge that we have a marked clean up in the area and enforce fines if people are seen to be throwing litter on the floor. I regularly try to pick up rubbish when walking and clear litter from the bus shelter. The wildlife and environment need protecting, and not enough is being done.</p>	<p>These Areas are fully supported in the NDP. Further action is outside scope.</p>
48	Nicola David	<p>Safe walking and cycling routes out of the village are essential, for traffic reduction, access to open space, opportunities for exercise and sustainable transport. As 6.33 comments, for children to cycle outside of the village safely they first need to get their bikes elsewhere using a car. This is wrong for so many reasons, not least for their future independence and forming their travel habits as adults.</p>	<p>General Support. No action required.</p>
49	Owen David	<p>It would be fantastic to extend the shared use cycle lane from Leamington to Radford providing it can overcome the issue of where the footpath narrows where the road crosses the canal just before Ricardo</p> <p>Having a safe circular walk around Radford would be a great benefit</p>	<p>NDP supports this on a general level. No action required.</p>
50	Karen Price	<p>Whilst, quite rightly, there appears to be a lot of concern regarding loss of green spaces surrounding the village, there is an insidious loss of green space that everyone conveniently ignores. The green spaces over which villagers do have control are slowly being lost; front gardens are disappearing as home owners remove hedges, shrubs and trees to make way for their vehicles. This malaise now appears to be speeding up, changing the character of the village and bringing with it social,</p>	<p>General Support. Areas already covered. No action required.</p>

No.	Respondent	Response	NP Committee Action
		<p>environmental and ecological issues. Some interesting reading can be found on the following websites:</p> <p>RHS.org.uk - Gardening in a changing world. RHS.org.uk - Greening grey Britain. ChrisPackham.co.uk - A People's manifesto for wildlife. Wildlifetrust.org - Nature recovery network.</p> <p>I would like to thank everybody involved in the Neighbourhood Plan project. It is nice to see that community spirit still thrives in areas. My thanks also to FORGE.</p>	
51	Helen Aries	<p>I agree that the current rate of population growth in the village is unsustainable as there have been numerous RTC's and sewage problems.</p> <p>I support this as the canal has been of importance to wildlife and a traditional way of life for people.</p>	General Support. No action required.
52	Jenny Wilkinson	It is extremely important that the village does not merge with Whitnash or Sydenham in order to keep our identity as a 'village'.	General Support. No action required.
53	andrew.pope@gratex.co.uk	<p>I would like to have a road crossing point in order to access canal near Ricardo.</p> <p>I would like to have better traffic management such as chicanes and speed bumps, including a controlled crossing point to enable access to the canal near Ricardo.</p>	General Support. No action required.

No.	Respondent	Response	NP Committee Action
54	andrew.pope@gratex.co.uk	I would like to support that no further building is done in the separation area.	General Support. No action required.
55	Ed Coombs	Paragraph 4.4 The plan mentions village growth being increased only by large new developments within the WDC Local Plan, but does not mention the case where the village could be increased by small scale development, of for instance, existing house plots into multiple dwellings, by change of property use, or by a conversion to multiple occupancy, or by several smaller 3-4 housing developments. To further protect the existing village envelope, could the steering committee consider adding a statement to reject support for these types of stealth growth within the village ?	Added to RS1.
56	Ed Coombs	Para 6.21 It may be applicable to include a statement in 6.21, that the northern boundary of the parish is now included within the new Warwick District Grand Union Canal Conservation area Map 6 - Fosse, as from January 2019, to give further protection for that part of our village.	This would need a change of Parish and Designated Boundary. Unfortunately too late for this Plan.
57	Martin Lloyd	I have read the document in detail. As a Parish resident of 22 years with two offspring, both hoping to stay in the area, I support this as being pragmatic, proportionate and realistic and in the interests of all current and future residents in the locality	General Support. No action required.
58	Brian Austin	I consider that the area of separation is insufficient and it needs to be extended further south and further north, including the area between the canal and the river.	Separation could be increased but this would dilute the policy. Not considered

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		<p>"I consider that section 6(viii) needs to be strengthened, as there does not appear to be sufficient detail. New access to the canal from the A425 can be achieved by providing a footpath and/or cycle route from the end of the housing in Offchurch Lane down to the canal bridge along the side of the stream on the other side of Offchurch Lane in the area of shrubbery (I don't know what it is called) that appears to be unused. Also, I support a link to the Greenway (6.33/6.34 on P50) and I cannot understand why the viaduct is fenced off, when it would be feasible to install fencing across the bridge to keep people away from the parapets for safety (if that is the issue), without stopping the pedestrian/cycle access to the Cycle Route. It is obvious that the original intention was for access from the Cycle Route to the bridge since a gate was provided for that purpose from the Greenway. This would be especially beneficial with the additional housing at Semele Park giving them access to the Canal Bridge at Bottom Lock and the Greenway via the viaduct."</p>	<p>prudent but comments noted.</p> <p>One need to be careful on detail as this is for the project owner to decide.</p> <p>Support for cycle way noted and is part of a S106.</p>
59	Brian Austin	RS7 support.	General Support. No action required.
60	Peter Stocker	<p>In line with Government policy, we need to plant as many trees as possible in order for the UK to become carbon neutral, which we this is very important.</p> <p>The village plan looks quite OK, providing it is kept to.</p>	General Support. No action required.
61	Anthony Wilson	<p>Would suggest an additional comment be included as follows under the Environmental & Green Spaces (P.17).</p> <p>Open up access to the old railway viaduct which crosses the canal at Radford Bottom Lock. This would provide walkers with safe crossing of the canal.</p>	General Support. No action required.

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62	Peter Morrell	<p>With the expansion of the village by almost 300 new houses, extra communal facilities would be advantageous, e.g. cricket pitch, tennis court, pavilion and could act as a catalyst in "bringing the village community together".</p> <p>I fully support the Radford Semele Neighbourhood Plan and would like to thank everyone concerned with its production.</p>	<p>Already supported, albeit little room for such large spaces. No Action Required</p>
63	Pauline Morrell	<p>Just one observation, the Manor House was described as having three apartments. There are four dwellings:- Gable House Copper Beeches Wisteria Cottage The Manor House These constitute the Manor House Complex.</p> <p>There is not an area for the following: This is an excellent document exhibiting in its 87 pages an enormous amount of work and detail. Thank you to all involved. I fully support the Neighbourhood Plan. Pauline</p>	<p>Plan updated.</p> <p>General Support. No action required.</p>
64	Robert Burns	<p>It would help if cameras were fitted at the entrance to Lewis Road and School Lane, to monitor vehicle movements in and out of the village.</p>	<p>Cannot be addressed by NDP.</p>
65	Joyce Burns	<p>I would suggest that cameras be fitted to the end of Lewis Road and School Lane to capture vehicle movements in and out of the village</p>	<p>Matter for Highways. No Action required.</p>
66	Mr D F Simpson	<p>It is extremely dangerous cycling into Leamington with almost continuous traffic & yjr fact the road narrows down the hill. A good number of local cyclists cycle down the footpath (which is quite</p>	<p>Already addressed in Plan. No action required.</p>

No.	Respondent	Response	NP Committee Action
		narrow in places). Could the footpath be made into a Cycle Trac & Footpath by widening the path from Kinghurst down to Gullimans Close. There is quite an area of grass which could be used. The only problem being the canal bridge where the parapet would have to be moved to widen access. If this was implemented, I am sure that a great deal of people would use it + endorse the Governments plan to get people on their cycles, removing traffic from the road & a healthier life style.	
67	D Byron	Security:- CCTV Cameras - end of Lewis Road & School Lane Lights - to be left on in the evening.	Justification of CCTV cameras and leaving street lighting on is not a matter for the NDP. However noted.
68	Stephanie Carter	CCTV to be installed Lewis Road in and out. Street lights to be turned back on.	“
69	Bryan Brown	I would like to see CCTV Cameras at the end of Lewis Road and School Lane and street lights left on at night.	“
70	Miss C Webb	We would like CCTV Cameras on the end of Lewis Road & School Lane. And lights left on in village.	“
71	Sue Gill	I would like to see CCTV cameras at the two entrances to the main village - School Lane and Lewis Road. I would also like the night-time lighting to be reinstated.	“
72	Trevor Betts	1) Cameras at the end of Lewis Road and School Lane. 2) Street Lighting re introduced.	“
73	Mr & Mrs Ghag	* We need to have CCTV cameras on to two main roads that enter + leave the village. This would help with crime in the village. There are	“

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		only 3 roads that enter the village and can be covered by two cameras. * Also the occasional street light needs to be on so that we have more viability.	
74	Anne Wilson	I also feel strongly that the speed limit should be restricted from brow of the hill leaving Radford Semele towards the village of Offchurch. The road has many twists and bends and the traffic should be restricted by speed signs to 30 MPH.	Road safety addressed. No action required.
75	Mrs Andrea Filipuk	I strongly support an additional pedestrian crossing to the east of the village. This would enable bus passengers and people from Semele Park to cross in safety. The road is on a bend and it's difficult to see traffic. As for traffic calming on the A425, I'm not convinced that would work. Yes it may slow the traffic, but also clog up the area at peak time. Perhaps a speed camera would have the desired effect.	Area addressed in Plan. No action required.
76	Valerie Chantry	Support whole plan – no comments made.	General Support. No action required.
77	H E Marriott	An excellent plan, full of sensible suggestions and views and obviously the result of considerable effort.	<p>OA – include size of parish in plan.</p> <p>Other areas addressed in a general nature. Plan should not include specific examples.</p>

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		<p>An excellent plan, full of sensible suggestions and views and obviously the result of considerable effort.</p> <p>Some small points-</p> <p>The size of the Parish should be stated, either in acres (it's an historic entity) or in square miles. An idea of N/S and E/W dimensions would be interesting.</p> <p>Page 10- It should be pointed out that the local wildlife sites are privately owned and managed, this designation must not imply any right of access.</p> <p>Page 29- Small open spaces. Some tree planting on the south side of Hatherall Road would enhance that area. In a similar way, the crescent of grass at the bottom of Lythall Close and along the grass strip on the Offchurch Lane should be considered.</p> <p>Page 48- Circular walks. The benefit of these paths is often alluded to, therefore much more effort needs to be made to maintain and improve the footpath to the north of Leigh Foss.</p> <p>Page 65- Angley hole. There is a strong correlation between the success of wildlife and the disturbance by humans and dogs. Therefore the people are asked not to stray from public footpaths.</p>	<p>BW – To check that we have mentioned that some wildlife sites and paths are privately owned.</p> <p>No Action required.</p>

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		<p>It should be pointed out that the local wildlife sites are privately owned and managed, this designation must not imply any right of access.</p>	
78	David & Lesley Carter	<p>These are responses from David and Lesley Carter of The Elms, 6, School Lane.</p> <p>Policy RS12 Area of Separation</p> <p>This policy is critical to maintaining the character and identity of the village. We strongly support it and would urge that it is worded as strongly as possible. Because of the Green Belt status of land north of Leamington there will be pressure on this area which should be resisted. We note that the local green spaces in Policy RS2 are proposed to have Green Belt protection. Could the area of restraint be classed as a local open space or protected more strongly than the current wording?</p> <p>Policy RS8 Footpaths</p> <p>We have a suggestion in relation to the eastern footpath link to the Canal. We recognise that there are difficulties which may not be overcome in re-opening the old railway bridge. Currently access is either via the permissive field path requiring people to cross the lock gate or via the road without a footpath. We would suggest that the option of creating a permissive path from the permissive field path through the wood/scrubland to a point near the gates by the canal bridge on Offchurch Lane is included for exploration. If the eastern access to the</p>	<p>General Support. No action required.</p> <p>Comment Taken. It is doubtful that the AOS could get Green Space Status</p> <p>Work already ongoing opening access to Western end of Canal. Eastern access subject to landowner restrictions & Highways.</p>

No.	Respondent	Response	NP Committee Action
		<p>canal is not improved the benefits of the proposed western access off the A425 will be reduced as many people will feel that there isn't a safe circular route</p> <p>Policy RS5 Protection of Community Facilities</p> <p>We fully support the importance of the school and pre-school facilities. We suggest that the policy wording should be modified to recognise that proposals for expansion should be subject to satisfactory planning and traffic management arrangements. As it stands now it is open ended support for 'any proposal'.</p> <p>Policy RS7 Non-designated Heritage Assets</p> <p>Unfortunately, we wish to object to this policy which affects our property.</p> <p>At the meeting of the Steering Group on 9 January 2018 it was agreed that owners should be contacted so that they were aware of proposals affecting their property. This hasn't been done in our case. We would specifically request a discussion on this policy. A general consultation cannot make good the absence of a specific consultation with owners of the properties affected by the proposed policy RS7.</p> <p>It isn't clear that the application of the criteria and the threshold for inclusion has been carried out in a way which justifies the proposed policy RS7 as either a necessary or appropriate addition to the normal planning application process. In our case we are doubtful that the criteria are met. Part of our house is Victorian,</p>	<p>School says they already unable to expand further. However, they are happy with reserving a field.</p> <p>Ongoing action.</p>

No.	Respondent	Response	NP Committee Action
		<p>part is late twentieth century and we have a concrete garage. Also, planning permissions granted between ten and twenty years ago in respect of the old school site and the adjoining cottage have completely compromised the historical context of this part of School Lane. The policy should also make allowance for the need to bring older properties up to modern standards of energy efficiency and amenity.</p> <p>All this means that we object to the current Policy RS7 and raise a number of questions about the process and the proposals. We are very happy to enter into constructive dialogue with the Steering Group as soon as possible.</p> <p>New Policy on infrastructure</p> <p>Whilst we recognise that some policies are determined by bodies with a wider remit we believe that there are elements of basic infrastructure requirements which should be reflected in the neighbourhood plan. We highlight three which are sewerage, superfast broadband and electric charging for cars.</p> <p>In relation to sewerage the plan says that the capacity of the school is limited by sewerage capacity. When there is heavy rain raw sewage sometimes escapes from the manhole on Southam Road at the bottom of School Lane. This is simply unacceptable. It could be made worse by the decision to allow 60 more houses to be built at the end of Spring Lane. It is not unreasonable for a neighbourhood plan to be clear that the whole village should have sewerage capacity of a satisfactory standard.</p>	<p>Infrastructure is difficult to include in a NP.</p>

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		<p>Superfast broadband is an essential requirement for a thriving village community. The plan should be clear that superfast broadband should be available to all properties in the village or at the very least those in the main settlement.</p> <p>Similarly, we suggest that the question of electric charging points for cars is considered. In particular discussions could be held with the Community Hall committee and the White Lion about whether they would be prepared to host small site. It may well be that the parish could ask to be part of the development and piloting of proposals by the County and /or District Council.</p> <p>General</p> <p>We would be happy to discuss any of the points raised in this response with the Steering Group and we specifically request a discussion on Policy RS7</p>	
79	Coal Authority	Having reviewed your document, I confirm that we have no specific comments to make on it.	General Support. No action required.
80	Federal Mogul	Federal-Mogul objects to Policy RS6 on the basis of an insufficient evidence base exists to support the policy. In summary:	A separate document is to be produced to demonstrate how final views were chosen.

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		<ol style="list-style-type: none"> 1. There is no supporting evidence document(s) to review referred to in NP para.6.19 2. There is no detail on how the long list of views was selected 3. There is no detail on the long-list of views assessed 4. There is no detail on how the short-list was reached 5. There is no detail on the methodology for assessment 6. There are no reported findings in evidence on the long or short list views assessment 7. There is insufficient evidence in Appendix 3 on each view as the value 8. There is no objective assessment undertaken in line with <i>Guidelines for Landscape and Visual Impact Assessment (GLVIA3)</i> 9. There is a contradiction in evidence of the number of Key Views – is it 6 or 8? <p>In our view Policy RS6 is not positively prepared, justified or effective without provision and improvement of the evidence base. And until such time the evidence base is available it is not possible to make any reasoned representation to the basis and justification of the Community Valued Views.</p>	<p>This is not an expert report but demonstrated a method applied by the committee.</p>

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		<p>Federal-Mogul reserves the right to add to and make substantive representations if necessary once the evidence base has been provided to justify the draft policy.</p> <p>Detail of objection</p> <p>NP paras.6.19 refers to several matters that should be available for review in evidence but are unavailable. This fundamentally undermines the justification of the policy and leaves unanswered whether it has been positively-prepared.</p> <ul style="list-style-type: none"> • NP 6.19 refers to resident comments to retain <i>important iconic views</i> and that these views <i>were considered important because they reinforce Radford Semele’s identity</i>. No evidence is available to understand which are the important iconic views referred to. • NP 6.19 states <i>The Neighbourhood Plan Steering Group undertook a survey of important local views</i>. It is not clear how this survey was informed by the resident comments on important iconic views, i.e. to include all or some views. Or whether the Steering Group independently drew-up a list of important views. • NP6 6.19 states <i>A long list of views were assessed against landscape sensitivity, openness, importance of setting and community value using recognized national guidance from Historic England, Campaign for Rural England and advice in NPPF</i>. Several questions arise here; o 1) What are the views on the long list, how was this drawn-up and where Federal- 	<p>The views presented are iconic to the community.</p> <p>Short document being prepared for views. The choice was put to the community. There was a majority support in the village consultations. Committee had to strongly reject some suggested new views as they didn’t meet standards.</p>

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		<p>Mogul objects to Policy RS6 on the basis of an insufficient evidence base exists to support the policy. In summary:</p> <ol style="list-style-type: none"> 1. There is no supporting evidence document(s) to review referred to in NP para.6.19 2. There is no detail on how the long list of views was selected 3. There is no detail on the long-list of views assessed 4. There is no detail on how the short-list was reached 5. There is no detail on the methodology for assessment 6. There are no reported findings in evidence on the long or short list views assessment 7. There is insufficient evidence in Appendix 3 on each view as the value 8. There is no objective assessment undertaken in line with Guidelines for Landscape and Visual Impact Assessment (GLVIA3) 9. There is a contradiction in evidence of the number of Key Views – is it 6 or 8? <p>In our view Policy RS6 is not positively prepared, justified or effective without provision and improvement of the evidence base. And until such time the evidence base is available it is not possible to make any reasoned representation to the basis and justification of the Community Valued Views.</p> <p>Federal-Mogul reserves the right to add to and make substantive representations if necessary once the evidence base has been provided to justify the draft policy.</p> <p>Detail of objection</p> <p>NP paras.6.19 refers to several matters that should be available for review in evidence but are unavailable. This fundamentally undermines</p>	

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		<p>the justification of the policy and leaves unanswered whether it has been positively-prepared.</p> <ul style="list-style-type: none"> • NP 6.19 refers to resident comments to retain important iconic views and that these views were considered important because they reinforce Radford Semele’s identity. No evidence is available to understand which are the important iconic views referred to. • NP 6.19 states The Neighbourhood Plan Steering Group undertook a survey of important local views. It is not clear how this survey was informed by the resident comments on important iconic views, i.e. to include all or some views. Or whether the Steering Group independently drew-up a list of important views. • NP6 6.19 states A long list of views were assessed against landscape sensitivity, openness, importance of setting and community value using recognized national guidance from Historic England, Campaign for Rural England and advice in NPPF. Several questions arise here; o 1) What are the views on the long list, how was this drawn-up and where 	
81	Federal Mogul	<p>Federal-Mogul objects to the inclusion of a parcel of Land West of Spring Lane as part of the defined Area of Separation under Policy RS12, illustrated on Policy Map 8.</p> <p>Five plans are enclosed with this representation:</p> <ul style="list-style-type: none"> - DPP1 – Land West of Spring Lane, Radford Semele - DPP2 – Federal-Mogul Limited wider land holdings west of Radford Semele - DPP3 – Proposed Area of Separation - DPP4 – Extract <i>Landscape Assessment Update (2014) Plan: Landscape Sensitivity to Housing Development</i> 	<p>Area H52 refers to an old out of date area of land which was outside the village boundary and South of Spring Lane. This indicated at the time possible future area for development of around 60 houses.</p>

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		<p>- DPP5 – Plan deleted Local Plan housing Site H52</p> <p>Our objection and requested modification to improve the soundness of the Neighbourhood Plan ('NP') in summary is:</p> <ol style="list-style-type: none"> 1. There is no new evidential basis for extending the coverage compared to the March 2018 NP draft the Area of Separation eastwards toward Spring Lane. 2. The evidence base referred to does not support inclusion of the land West of Spring Lane (Plan DPP1) being included within the Area of Separation – it is of a lower landscape sensitivity and does not perform the same function for separation as land to the west. 3. Land West of Spring Lane remains the best sustainable development option for future housing for future plan review and its value should be recognised by removal of unnecessary designation restriction. To not do so will increase development pressure on other land of greater landscape sensitivity. <p>Our requested modification to Policy RS12 and Policy Map 8 is to remove the Land West of Spring Lane (shown on Plan DPP1) and revert to the defined Area of Separation as proposed in March 2018 (shown on Plan DPP3).</p> <p>No further modification to the text of Policy RS12 or paragraphs 6.45 to 6.51 will be required as the change to the Area of Separation will bring the policy and background/justification back into alignment.</p> <p>If there is no modification to the Area of Separation we reserve the right to make further representation at the next stage to the policy wording and justification.</p>	<p>This was overtaken by new applications since which have been accepted by WDC. This is not now an area for development in the local plan. The AoS goes up to the village boundary east from the north to the south of the village and must therefore include this area. Consequently, the comments made by Federal Mogul are considered out of date and the AoS must remain as proposed. Recommendations made are also relevant.</p> <p>No Action Required</p>

No.	Respondent	Response	NP Committee Action
		<p>In more detail on the three objection points.</p> <p>1. Evidential Basis</p> <p>No new evidence has been presented between the March 2018 draft and June 2019 draft Neighbourhood Plan to explain or justify the enlargement of the proposed Area of Separation to include the Land West of Spring Lane (Plan DPP1). It is unsubstantiated, and as we turn to in Point 2, inconsistent with the (limited) cited evidence to have done so.</p> <p>2. Evidence base does not support inclusion of Land West of Spring Lane</p> <p>The only available evidence in background / justification to Policy RS12 are paragraphs 6.45 to 6.51. Within are cross-references to two documents that formed evidence to the Warwick Local Plan, namely: Green Belt and Green Field Review (2013) Landscape Assessment Update (2014)</p> <p>Neither document was commissioned with the purpose of defining an area of separation. The Green Belt and Green Field Review was a higher-level review of land parcels, such as Green Field Parcel RS4 that contains a significant part of the proposed Area of Separation, but also most of the urban area of the village to west of Lewis Road. The conclusion reached and quoted at NP para.6.49 relates to the whole Parcel RS4 and the parcel wide assessment undertaken. The assessment does not ask nor answer a question whether individual or combined fields of the Parcel could be developed with or without harm to assessed matters of restricting sprawl, merging of towns, encroachment or openness. This is fundamentally important to the reliance that can be given on the evidence to Policy RS12 as the findings cannot be</p>	

No.	Respondent	Response	NP Committee Action
		<p>disaggregated into smaller areas and to apply the conclusion to that smaller area.</p> <p>The Landscape Assessment Update provides an assessment on landscape sensitivity to housing development, subdivided into parcels that are different to the Green Belt and Green Field Review, and different too the proposed area of separation. Area RS07 is the parcel of most importance containing the majority of the area of separation and the site of our interest at Land West of Spring Lane (Plan DPP1). The conclusion that whole proposed Area of Separation is of a “high” value is not supported in evidence:</p> <ol style="list-style-type: none"> 1. Extract of the Landscape Assessment Update (DPP4) shows not all the land in Area RS07 is of “high” sensitivity. 2. The Area of “high/medium” sensitivity includes housing commitment (‘AC Lloyd site’) at Spring Lane and our client’s Land West of Spring Lane, the latter in the proposed Area of Separation. 3. As an area of land of high/medium sensitivity the Land West of Spring Lane (with the AC Lloyd site) has been assessed to have a different landscape sensitivity in recognition that it is bounded on two sides to north and east by the settlement. 4. Factually the simply drawn conclusion at NP para.6.50 is wrong. NP para.6.51 provides a quote from the Inspector’s Report into the Warwick Local Plan (IR.89 & IR.90). Though provided at NP para.4.4 the Inspector’s findings on housing requirement (IR.336) is relevant to draw through in consideration of the proposal to include our client’s site into the Area of Separation. In rejecting the need to allocate additional housing land at Redford Semele to meet identified needs in the plan period the Inspector concluded (IR.336) that; 	

No.	Respondent	Response	NP Committee Action
		<p><i>'... the level of housing growth which is already committed will result in a very substantial expansion of the built form of the village.'</i></p> <p>He continued to say that there is;</p> <p><i>'... very limited, if any, capacity at the school and no realistic prospect of it being expanded on site or a new school being provided in the village under current circumstances. There is no need to allocate further sites in order to secure sufficient housing growth in the village or to meet the overall housing requirements for the District.'</i></p> <p>The Inspector's comments (IR.338) turn to the Land West of Spring Lane then proposed by the Local Planning Authority as Housing Allocation Site H52 and is therefore of direct relevance to the site DPP1. He states;</p> <p><i>'Development of the site (H52) would result in further clear and substantial extension of the built up area into open countryside. Whilst there would be a limited effect on the gap to Sydenham and despite the potential for landscaping, development would have a significant impact on the scale and form of the village and on the character and appearance of the area.'</i></p> <p>(our emphasis added).</p> <p>At IR.339 he concludes the adverse impacts of development would outweigh the benefits.</p> <p>The conclusion and balance is unsurprising with no additional housing requirement identified. But it is demonstrated through tested evidence of the Local Plan Examination, which is the same evidence cited in the Neighbourhood Plan, that the site is capable of housing development with only a limited impact on the gap to Sydenham. Demonstrably the site has a limited role in preserving an area of separation and its inclusion is not supported by the evidence base.</p>	

No.	Respondent	Response	NP Committee Action
		<p>Policy RS12 states <i>“Any developments that would result in a significant reduction in the area of separation or, distance between settlements or, harm the landscape/environment within the area of separation, such that it threatens the village’s physical separate identity will not be supported.”</i></p> <p>If we assume the area of separation is unchanged and a future development of the site is proposed it will not decrease the separation distance to Sydenham geographically – the limited impact – because physically development cannot be closer, a point the Inspector acknowledged. Development would also not amount to a significant reduction in area – even assuming its whole development without any landscape buffer – it would amount to little more than 7% of the proposed Area of Separation (circa 44 ha vs. 3.3 ha). On two of the three policy measures the site fails to support the policy by its inclusion as its development would not harm the policy. With no harm to the matters of separation at the heart of the policy it must follow that it will not threaten the village’s physical separate identity either. To draw a different conclusion would be to deny how Policy RS12 is expressed to allow development that is not significant. Therefore, the development of site will not harm the landscape/environment within the area of separation to the matters of cited concern, the only harm being the fact of its designation. This returns the issue to our central point; the site does not perform the function that land to the west does as an area of separation and should be excluded based on the available evidence and on the logic of the application of the policy.</p> <p>We conclude there is no consistent or coherent evidence base presented that the Land West of Spring Lane should be part of the Area of Separation.</p>	

No.	Respondent	Response	NP Committee Action
		<p>3. Future development options</p> <p>Expressed hypothetically in Point 2 we confirm we do not seek an allocation for housing in this plan. Site H52 was considered in the recent Local Plan Examination and rejected on lack of additional housing need for the village. We accept that finding, but that finding did not then proceed to provide a basis to prevent future development, that simply was not a question considered in the Examination.</p> <p>As a matter of a fact there will be a future plan, with future development needs to provide for. We consider that this site is the first and best future housing site opportunity on available evidence to meet future needs at Radford Semele.</p> <p>Extract of the Landscape Assessment Update (DPP4) shows only three other areas of high/medium landscape sensitivity around the village, all other land is high sensitivity. Area RS09 is developed (Leam View), Area RS03 is under-development (Bovis Homes), and Area RS06 has been subject to two unsuccessful housing applications in 2016 and 2017 with an appeal withdrawn on the latter.</p> <p>On available evidence the Land West of Spring Lane, is the prime candidate in future plan review for housing development as it is sustainably located in relation to the existing village and services, will be accessible via the AC Lloyd Homes site to the north, and importantly will remove pressure on land elsewhere of high landscape sensitivity from development.</p> <p>It therefore follows that the treatment of the site in this Neighbourhood Plan should not seek to apply a designation that could diminish the role the site can play in a future plan review to detriment of evolving a sustainable pattern of development.</p>	

No.	Respondent	Response	NP Committee Action
82	Highways England	No comments at this time	General Support. No action required.
83	Historic England	<p>Thank you for the invitation to comment on the Regulation 14 Neighbourhood Plan.</p> <p>Historic England is supportive of the Vision and objectives set out in the Plan and the content of the document. In particular we commend the emphasis on local distinctiveness and the maintenance of historic rural character, including through the protection of undesignated heritage assets as set out in Policy RS7 and the maintenance of an Area of Separation from adjacent urban areas (RS12).</p> <p>Overall the plan reads as a well-considered and concise document which we consider takes a suitably proportionate approach to the historic environment of the Parish.</p> <p>I hope you find these comments helpful.</p>	Generally covered in Plan.
84	National Grid	<p>National Grid has identified the following high-pressure gas transmission pipeline as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> • • FM14 – Churchover to Wormington <p>From the consultation information provided, the above gas transmission pipeline does not interact with any of the proposed development sites.</p>	General Support. No action required.
85	Severn Trent	<p>Policy RS1 – Severn Trent is supportive of Policy RS1 in principle, however recommend that policy wording is included which focuses on development design. In particular we recommend that any new development promotes the use of sustainable drainage and the discharging of surface water via infiltration or watercourse as per the Drainage Hierarchy (Planning Practice Guidance Paragraph 80). We</p>	General support on RS1 & RS6 noted.

No.	Respondent	Response	NP Committee Action
		<p>would also strongly recommend that local planning authorities incorporate the voluntary building standard of 110 l/p/d into their planning policies so that new development is designed in line with water efficiency in mind. Further information on water efficiency can be found within the water efficiency section of this response.</p> <p>Policy RS6 – Severn Trent is supportive of this policy, particularly sections b), c) and d). The retention of watercourses, ditches and land drainage are essential to facilitate sustainable drainage of surface water for new development and for future generations. It is recommended that watercourses are retained within open space to enable access for maintenance, preventing encroachment and improving biodiversity</p>	
86	Warwick DC	<p>P2, Figure 1 – Neighbourhood Plan process</p> <ul style="list-style-type: none"> • The wording in the box entitled ‘referendum’ could be made clearer. The referendum would only refer to a single version of the RSNDP. <p>Section 6 – Neighbourhood Plan policies</p> <ul style="list-style-type: none"> • Policy RS2 – there are reservations that all of the proposed Local Green Space designations would meet the strict tests set out in the NPPF. It is noted that one of the spaces proposed is designated as a Local Wildlife site, so its ecological significance is already acknowledged. • Policy RS2 – designated Local Green Spaces treated akin to Green Belt. • Policy RS5 – This policy expands upon policy HS8 of the local plan. It is unclear what happens if new community facilities are 	<p>Noted.</p> <p>Wording revisited. Committee feels that Green Spaces meet requirements in the NPPF.</p>

No.	Respondent	Response	NP Committee Action
		<p>developed within the plan period – would these be afforded protection under this policy? E.g. scout and guide facility.</p> <ul style="list-style-type: none"> • Policy RS5 – Have you considered applying to list any of these community facilities as ‘Assets of Community Value’? • Policy RS6 (e) – policies regarding protecting views are often challenging, and have been resisted by WDC in other neighbourhood plans across the district. They have the potential to raise local expectations of preventing development, and often extend beyond the parish boundary, where the neighbourhood plan has no jurisdiction. <p>Many of the views identified within this draft policy will inevitably be altered to some degree over the plan period, making this policy difficult to interpret. For example, view 5 as identified, may be significantly altered by the development of housing allocation H03 in the local plan (part of the strategic spatial strategy and policies of the local plan, and beyond the parish boundary). I note the accompanying text in paragraph 6.20, that it is not the intention of the policy to preclude development, however it is difficult to foresee how the policy might be interpreted in practice to ‘retain the overall qualities of the views’.</p> <p>Policy RS6 (e) – 8 views are listed within this policy, though only 6 are explained within the corresponding appendix.</p> <ul style="list-style-type: none"> • Policy RS8-RS10 inclusive – these policies are largely aspirational, though not consistently strictly land use planning 	<p>Wording of policy changed.</p> <p>Views were well supported by the community and reduced from a larger number. A document will be added to show how the views were decided.</p>

No.	Respondent	Response	NP Committee Action
		<p>matters (e.g. road traffic speed restrictions). The separation of these transport strands for ease of understanding is welcome. Do you have any thoughts on how the suggested improvements might be funded and delivered? These might translate into a Parish Plan.</p> <ul style="list-style-type: none"> • Policy RS12 –The limited circumstances under which development outside of the defined settlement boundary might be acceptable are set out within policy H1 of the local plan (which WDC considers to be a strategic policy). Given that draft policy RS12 does not preclude all development, it is broadly concluded that the two would not be in conflict. 	
87	Warwickshire County Council	<p>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.</p> <p>We made comments of highway matters and have no additional matters to add.</p> <p>Flood Risk Matters</p>	

No.	Respondent	Response	NP Committee Action
		<p>We have some minor suggestions and these are contained in appendix A attached to this letter (see below)</p> <p>Policy RS2</p> <p>The LLFA encourage and support the protection of local green open spaces, including any wetlands and watercourses. This could be developed to mention the benefits of open space as flood risk management to retain water.</p> <p>Policy RS6</p> <p>Point B – the LLFA support the retention of water features. However, we would encourage that this point is developed or another point is written to include the following: <i>“any new developments should look 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”</i>.</p> <p>Other</p> <p>There is surface water outlines throughout the parish area, which is relative to the ordinary watercourse that</p>	<p>Added to Green space appendix.</p>

No.	Respondent	Response	NP Committee Action
		<p>runs through the south of the parish. A policy specific to Flood Risk and Drainage could be developed, which encourages any new development to incorporate Sustainable Drainage Systems (SuDS) on site, for both minor and major developments.</p> <p>This should include:</p> <ul style="list-style-type: none"> <input type="checkbox"/> All developments will be expected to include sustainable drainage systems. <input type="checkbox"/> SuDS features should be at the surface, and flood attenuation areas must be located outside of flood zones and surface water outlines. <input type="checkbox"/> The SuDS hierarchy should be adhered to. 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. <input type="checkbox"/> Discharge rates should be set to control run off at greenfield rates for a 1% AEP (Annual Exceedance Probability) event, plus an allowance for climate change. You could refer to our standing advice document https://apps.warwickshire.gov.uk/api/documents/WCCC-1039-73 <p>Provision of school places</p>	

No.	Respondent	Response	NP Committee Action
		<p>There is very limited scope for expansion of the Radford Semele C of E Primary School at the current site. However, there is no objection to the proposed Neighbourhood Plan.</p> <p>Public Health matters Public health experts have produced guidance for communities and this is contained in Neighbourhood Development Planning for Health document. The document contains evidence and guidance for promoting healthy, active communities through the neighbourhood planning process. The document can be found on; https://apps.warwickshire.gov.uk/api/documents/WCCC-630-656</p> <p>Alongside this, Warwickshire's place-based Profiling Tool or following link https://apps.warwickshire.gov.uk/api/documents/WCCC-644-449 can be used to understand the health and wellbeing needs of the local population.</p> <p>Should the Parish Council wishes to discuss the guidance document or the local health tool further please contact Gemma McKinnon on E mail address; gemmamckinnon@warwickshire.gov.uk.</p> <p>CIL monies expenditure by the Parish Council The Parish Council may receive CIL monies and should the Parish Council 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. Should the</p>	

No.	Respondent	Response	NP Committee Action
		Parish Council wish to discuss any proposal please contact Mrs. Philippa Young in the first instance on E mail philippayoung@warwickshire.gov.uk	