

Rudby Neighbourhood Plan Consultation

Personal Details

We need to ask you for some personal details to validate that respondents have a relevant interest in the Regulation 14 consultation.

Please Note: *Anonymous submissions will not be accepted as a Regulation 14 submission. Please provide your name and postcode which will only be used in connection with the Neighbourhood Plan. Submissions may be published on the Neighbourhood Plan website as part of the evidence base of the Plan after the consultation is complete. By submitting this survey, you consent to your personal data being used for this purpose. If you don't want to provide your details, we will be unable to include your submission in the consultation. Submissions should be made by an individual person. Other household members should complete their own response.*

Please Confirm your Full Name.

Given Name

Jane

Surname

Simpson

Postcode

TS15 0DW

Please tell us your reason(s) for participating in this survey

Select all that are applicable			
Live in Rudby Parish	<input checked="" type="checkbox"/>	*Own a Business in Rudby Parish	
Own Property in Rudby Parish	<input type="checkbox"/>	*Represent an organisation based in Rudby Parish	
Work in Rudby Parish	<input type="checkbox"/>	*None of the above	

***If you are responding on behalf of a Business or Organisation, please provide its name.**

***If you responded: 'None of the above', please explain the reason for your interest in the Rudby Neighbourhood Plan**

Vision & Objectives

Vision Statement

The Neighbourhood Plan vision statement was developed in community workshops and endorsed by the results of a community questionnaire. It states:

The Parish will develop, but retain its unique identity, and be a strong, sustainable rural community with a thriving village at its heart. The village will remain distinct in character from nearby market towns and suburbs.

Objectives

1. **Housing:** To provide safe places to live which provide the mix of sizes, types and tenures which meet identified Parish housing needs.
2. **Built Environment:** To provide a good quality built environment incorporating Green Spaces and Green Infrastructure Corridors which retains the distinctive character of the Parish, and protects its heritage.
3. **Natural Environment:** To protect and enhance the Natural Environment and biodiversity, and mitigate the adverse impacts of development and climate change.
4. **Community:** To enable opportunities for social connection and social inclusion, and to sustain and enhance local services to ensure access for all groups of the population to leisure, recreation, health and education facilities which are viable at a village scale and which promote health and wellbeing.
5. **Economy:** To sustain existing employment and commercial services within the Parish, and to encourage establishment of new businesses of appropriate type and scale for the village and the surrounding rural area.
6. **Traffic & Transport:** To mitigate the adverse impacts of motor vehicles by good road design and where practical by encouraging safe alternatives to the use of private cars.

Do you support or oppose the vision statement?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

Do you support or oppose the Neighbourhood Plan objectives?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

***If you respond 'oppose' to either of these questions or to any of the policies questions which follow please explain your reasons in the comment box at the end of the response form.**

Rudby Neighbourhood Plan Policies (RNP)

The Neighbourhood Plan is put into effect through its Policies. These designate land for development or for protection, or set out requirements and decision criteria for planning applications. The full text of the proposed Policies and their justifications are set out in the Consultation Draft of the Neighbourhood Plan which can be:

- Downloaded from <http://www.rudbyparishcouncil.org.uk/NP-consultation.php>; or
- Inspected at The Hub, Northside, Hutton Rudby during its normal opening hours; or
- Inspected at Information Events to be held during the consultation period.

You will now be presented with a summary statement on what each policy aims to achieve, and then you will be asked whether you support or oppose the policy. There are 15 policies.

RNP1 - Sustainable Development

This policy positions the Neighbourhood Plan policies within the wider planning framework. If the Neighbourhood Plan is adopted, it will become part of the statutory development plan for the Parish, together with Hambleton's adopted Local Plan and national policies.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

RNP2 - Design Principles

This policy sets out design requirements for development in the Parish which focus on local character, climate change, and 'lifetime homes'.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

RNP3 - Housing Provision

This policy proposes an allocation of land south of Paddocks End for the development of approximately 25 homes to meet Parish housing need. It sets out the location, scale, and key features for the development.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

RNP4 - Windfall Housing

This policy sets out requirements for small scale developments whether as infill, on the edge of villages or in the open countryside.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

RNP5 - Affordable Housing

This policy sets out a requirement for local people to be given priority access to new affordable housing developed in the Parish.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

RNP6 - Redevelopment of Redundant Buildings in the Countryside

This policy provides support for the conversion of redundant buildings to uses which will enhance the rural economy.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

RNP7 -Safeguarding and Improvement of Community Facilities

This policy aims to secure the long-term future of facilities which are valued by the community.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

RNP8 - Communication Technology

This policy aims to ensure that new developments are suitably equipped to support domestic needs, home working, and the rural economy.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

RNP9 - The Transport Network and Parking Provision

This policy seeks to minimise any adverse impacts from parking arising from new development (particularly in the Conservation Area), and to facilitate the transition to electric vehicles.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

RNP10 - Natural Environment and Landscape

This policy provides protection for areas and natural assets which are important to the setting and character of the Parish.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

RNP11 - Biodiversity and Green Infrastructure

This policy sets out requirements for developments to protect and enhance biodiversity.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

RNP12 - The Leven Valley

This policy sets out requirements aimed at protecting the special character of the Leven Valley.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

RNP13 - Local Green Space

This policy provides protection for green spaces identified as being special to the community.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.		✓		

RNP14 - Significant Views

The policy seeks to safeguard views identified as being special to the community from being harmed by development.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

RNP15 - Protection and Enhancement of the Conservation Area

This policy sets out requirements for development in the Conservation Area aimed at protecting and enhancing its character and appearance.

Do you Support or Oppose this policy?	Support	Oppose *	Neither support or oppose	Don't know
Select one option.	✓			

***If you responded 'oppose' to any of the questions on Vision, Objectives or Policies please explain your reasons in the comment box at the end of the response form.**

Comments

Do you have any comments or observations on the Neighbourhood Plan that you would like to make?

RNP2 – Design Principles

Minimum standards for energy efficiency/use of renewable energy will be increasing substantially in the near/mid future so it is important that the standards of energy efficiency and use of renewable energy incorporated in any development are well in excess of current minimum planning/building standards. The danger of not meeting climate change targets cannot be underestimated and major actions to reduce the impact on the climate need to be taken now. Achieving higher standards at development will save running costs and will be cheaper than having to retrofit at a later date.

RNP3 – Housing Provision

The analysis in Appendix C clearly demonstrates that an allocation of 25 dwellings will more than meet the demand identified in the various housing surveys so this number should not be exceeded.

The provision of public open spaces, increasing biodiversity, and protecting and enhancing the green infrastructure are key elements of any development as well as requirements of the NPPF. These factors also help to meet climate change targets and are important for people's well-being. Hundale Gill, which forms part of this development, is a critical element in meeting these requirements so great care should be taken over how it is not only protected but also enhanced.

RNP4 - Windfall Housing

For this policy to operate, it is important that the boundary of the current built form is clearly identified.

It is important to stress that windfall development adjacent to the built form must meet condition 2. a).

Are any changes in Hambleton's emerging Local Plan likely to affect this important policy?

RNP5 – Affordable Housing

To meet the NP Vision Statement and Objective 1, it is important that this policy is part of the NP.

The need for "local occupancy" is an important feature and every effort should be made to ensure this is achieved.

RNP6 – Redevelopment of Redundant Buildings in the Countryside

Does this need strengthening to say that the building needs to be constructed of brick/stone? Is there a need to stipulate how old the building is, how long it was in use, how long it has been out of use? Someone could put up a "farm building" for livestock, say, and then say after a year or so they no longer keep livestock and therefore it is redundant and should be turned into a live/work unit?

Care needs to be taken to ensure that "loopholes" are not created that could be abused.

RNP7 – Safeguarding and Improvement of Community Facilities

Does 1. j) need to be extended to include the Green Spaces identified in Hambleton's Local Plan?

RNP8 – Communication Technology

No comment

RNP9 – The Transport Network and Parking Provision

Parking is a constant problem within the main settlement so this policy should make sure the problem is not exacerbated and, ideally, relieved wherever possible.

RNP10 – Natural Environment and Landscape

The importance of protecting the Natural Environment and Landscape is essential to

- 1 meet the NP Vision Statement and Objective 3,
- 2 help meet climate change targets and
- 3 enhance the well-being of parishioners.

The Parish is fortunate to host SINC's, ancient woodland/trees, nationally recognised priority habitats, and nationally recognised areas such as Network Enhancement Zones and a sub-regional green infrastructure corridor. It is important these are not only recognised/protected but also enhanced.

RNP11 – Biodiversity and Green Infrastructure

As mentioned under RNP10, the Parish is fortunate to include a sub-regional green infrastructure corridor (highlighted in Hambleton's emerging local plan) as well as a Network Enhancement Zone and other important priority habitats. These all need to be protected and enhanced and it is important that this policy recognises the fact.

In 2008, BioRegional and CABI, inspired by the eco-towns challenge panel, produced a report entitled *What makes an eco-town?*¹ The minimum target for canopy cover in the report was set at 25% in residential areas and 15% in mixed-use or commercial areas. In the intervening thirteen years the need to not only meet this target but to exceed it, has become even more important. Cities such as Birmingham, for example, have set a target for all wards to have at least 25 per cent tree canopy coverage.² In order to achieve this target, new developments will have to exceed this target.

Legislation in this area is developing the whole time so it is important (as included in the policy), that the latest guidelines must be met or exceeded.

Paragraph 180(d) of the NPPF 2021 now requires opportunities to incorporate biodiversity improvements in and around development, rather than simply making it optional.

¹ <https://www.designcouncil.org.uk/sites/default/files/asset/document/what-makes-an-eco-town.pdf>

² <https://www.birminghammail.co.uk/news/midlands-news/25-per-cent-tree-canopy-19341738>

The summary of the Government's 25 Year Environment Plan (2018)³ included the following

Enhancing beauty, heritage and engagement with the natural environment

We will conserve and enhance the beauty of our natural environment, and make sure it can be enjoyed, used by and cared for by everyone. We will do this by:

- safeguarding and enhancing the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage.
- making sure that there are high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and wellbeing
- focusing on increasing action to improve the environment from all sectors of society

Mitigating and adapting to climate change

We will take all possible action to mitigate climate change, while adapting to reduce its impact. We will do this by:

- continuing to cut greenhouse gas emissions including from land use, land use change, the agriculture and waste sectors and the use of fluorinated gases
- making sure that all policies, programmes and investment decisions take into account the possible extent of climate change this century
- implementing a sustainable and effective second National Adaptation Programme

Enhancing biosecurity

We will enhance biosecurity to protect our wildlife and livestock, and boost the resilience of plants and trees. We will do this by:

-
- reaching the detailed goals to be set out in the Tree Health Resilience Plan of 2018⁴
-

The Government's goals identified in the Tree Health Resilience Plan 2018 are to

- work together to protect and value our trees as important natural capital
- put biosecurity at the heart of everything we do, from onsite activities to buying practices
- develop and apply the latest science and evidence on the full range of threats to tree health to inform our risk-based approach
- apply the principles of the environmental goals to the management of our trees, woods and forests
- build the knowledge and capability to apply the concepts of resilience at all levels.

We've also identified goals for improving tree resilience, including baseline diversity and the health and condition of our trees, woods and forests. The environmental goals are:

- extent – a continued increase of trees, woods and forests
- connectivity – enhancing the linear forest and matrix of trees within other habitat settings
- diversity – enhancing the genetic diversity and increasing the structural diversity of our treescape
- condition – encourage healthier trees and thriving woodlands and forests.

³ <https://www.gov.uk/government/publications/25-year-environment-plan/25-year-environment-plan-our-targets-at-a-glance>

⁴ <https://www.gov.uk/government/publications/tree-health-resilience-strategy-2018/tree-health-resilience-strategy-our-goals>

All these actions/goals are particularly relevant to the NP and, if at all possible, the policy should be enhanced to include/address these issues.

RNP12 – The Leven Valley

The importance of the Leven Valley to the whole Parish cannot be overstated. It provides

- the setting for nearly all the priority habitats within the Parish,
- it is central to the sub-regional green infrastructure corridor (highlighted in both Hambleton’s Local Plan and the Neighbourhood Plan),
- it is host to Defra’s Network Enhancement Zone,
- it is a major wildlife corridor,
- it provides many of the Parish’s outstanding views,
- it provides many recreational facilities for the Parish’s residents, and
- it is recognised by Hambleton in their Landscape Character Assessment and Sensitivity Study⁵ and in their Settlement Character Study⁶.

If at all possible, this policy should be strengthened to protect the whole valley across the Parish.

RNP13 – Local Green Space

The reason for opposing this policy is that it does not include all areas that should be green space.

There are three areas which have been rejected which I believe have been rejected incorrectly - namely,

GS007/b (incorrect application of para 99),
GS011 (misclassification of richness of wildlife), and
GS004/b (approval for development has lapsed since original assessment).

As mentioned under RNP12 above, the importance of the Leven Valley to the whole Parish cannot be overstated and both sites GS007/b and GS011 are integral to the Leven Valley and are at the heart of the main settlement.

GS007/b - North west corner of field to the south of Southview

This site is central to the Leven Valley and the main settlement, and together with GS007/a forms a coherent whole.

The assessment of this site has the following conclusion

“The site is ‘local’, is in ‘reasonably close proximity to the community it serves’, and it contributes to the settlement character, to the setting of the Grade I listed Parish Church, and the Grade II listed bridge .It is unlikely to satisfy para 99 of the NPPF so is not suitable for designation.”⁷

⁵ <https://www.hambleton.gov.uk/downloads/file/1123/sd27-landscape-character-assessment-and-sensitivity-study-may-2016>

⁶ <https://www.hambleton.gov.uk/downloads/file/937/hambleton-settlement-character-study>

⁷ <http://plan.rudbyparishcouncil.org.uk/wp/wp-content/uploads/2019/08/NP-Non-Recommended-Green-Space-Assessments-Hutton-Rudby-Rudby.pdf>

There is no question that this site satisfies para 100 of the NPPF and the reason for rejection is purely that “It is unlikely to satisfy para 99 of the NPPF so is not suitable for designation”. Para 99 of the NPPF requires that a site ‘*must be capable of enduring beyond the plan period*’ .

The Parish Council, in their submission⁸ to the recent additional Hearing Day on Hambleton’s green space, argued very strongly that while landowner’s views need to be taken into consideration, they do not have a veto over designation. This view was supported by Hambleton at the hearing.

Section 4.4 of the Parish Council’s submission to the hearing, includes the following

“Section 1 of HDC’s SD25 LOCAL GREEN SPACE ASSESSMENT: COMBINED RECOMMENDATIONS REPORT explains why educational sites and highway land/road side verges would usually fail the ‘enduring’ test. In generic form the explanation is that the land may **need** to be developed at some point, and there are either permitted development rights to allow this or higher priority national policies in relation to those needs which should take precedence over any LGS designation. “

The same section goes on to state

It is our contention that a policy or supporting methodology or any associated decision which fails to account for the specific context of a site when applying the enduring test is unsound.

It is our further contention that the local context of Hutton Rudby/Rudby is that most undeveloped land in and around the village is capable of enduring beyond the plan period, whether proposed for LGS or not. (Most of it does not meet the LGS criteria).

In their submission to the additional Hearing Day, the Parish Council set out very clearly their view on land enduring beyond the plan period. The rejection of site **GS007/b** on the grounds that it is not capable of enduring beyond the plan period is in direct conflict with the Parish Council’s stated position and the site should be reinstated as a green space.

GS011 - Field to the west of the Leven Valley field

This site is central to the Leven Valley and the main settlement, and combined with GS007 forms the whole area between the River Leven and Southview. The River Leven runs along more than half of its boundary. It is visible from both sides of the river.

The reason given for rejection is

“The site is ‘local’, is in ‘reasonably close proximity to the community it serves’, and it contributes to the settlement character. It is not locally significant for beauty, historic value, recreational value, tranquillity, has limited richness of wildlife so is not suitable for designation”.

The conclusion states that the site “has limited richness of wildlife” yet it forms part of the main green infrastructure corridor in the Parish. Magic Maps⁹ records the broadleaved trees on its banks as part of the National Forest Inventory, and the NP assessment notes the site supports “Riparian habitat and woodland along riverbank. Wildlife corridor”.

I do not believe enough weight has been given to the “Richness of Wildlife” category and this site should be designated as green space.

GS004/b - Flagpole Field without LCPA

⁸ <https://www.hambleton.gov.uk/downloads/file/2346/1026701-rudby-parish>

⁹ <https://magic.defra.gov.uk/MagicMap.aspx>

The assessment of this site has the following conclusion

“The site is ‘local’, is in ‘reasonably close proximity to the community it serves’, and is locally significant for historic value and contribution to settlement character but is not suitable for designation as has planning approval for development”.

The planning approval for development for this site has now lapsed so the reason for rejection is no longer valid. This site should be designated as green space for the same reasons that its sister site GS004/a (Flagpole field with LCPA) has been recommended for green space designation.

RNP14 – Significant Views

Views are a key component of the natural environment and the landscape so it is important that they are protected.

Views are always subjective but there is a nice view from Goldie Hill looking over the allotments which is not shown. V17 is arguably the weakest view.

RNP15 - Protection and Enhancement of the Conservation Area

Alice Barrigan’s *A History Walk Round Hutton Rudby* (revised 2006) provides details of many of the special architectural features within the village. Her earlier work, *Stately Homes of Hutton Rudby : Historical notes on some village properties* (2000) also needs to be considered when any proposals are submitted for development/changes within the Conservation Area and further afield.

Other Comments

The Parish questionnaire in 2016 asked about development avoiding major hazards (e.g. pipelines). 85% of the respondents felt it was either Important (26%) or Very Important (59%) to avoid such features. This may have been taken into account with the site selection but there does not appear to be any reference to this important issue for any other development.