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Our Ref: MV/ 15B901605

19 May 2025

Local Plan Review Preferred Options Consultation

localplan@rugby.gov.uk

via email only

Dear Sir / Madam

Joint Local Plan Pre-submission Publication Version Regulation 19 Consultation

March – May 2025

Representations on behalf of National Gas Transmission

National Gas Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

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

Proposed sites crossed by or in close proximity to National Gas Transmission Assets

Following a review of the above document we have identified one or more proposed development sites as being crossed or in close proximity to National Gas Transmission assets.

Details of the sites affecting National Gas Transmission assets are provided below.

Development Plan Policy Reference	Asset Description
CL2 Renewable Energy and Low Carbon Technology (Areas Suitable for Wind Turbine Development)	Gas Transmission Pipeline, route: ALREWAS TO CHURCHOVER
	Gas Transmission Pipeline, route: CHURCHOVER TO WORMINGTON DUPLICATE
	Gas Transmission Pipeline, route: CHURCHOVER COMP TEE TO HONEYBOURNE
	Gas Transmission Pipeline, route: DUDDINGTON TO CHURCHOVER

A plan showing details of the site locations and details of National Gas Transmission's assets is attached to this letter. The plan shows specific areas included within Policy CL2 noted as suitable for wind turbine development, that contain National Gas Transmission assets within



the Site boundary. Areas where National Gas assets are not present have not been included in the plan. Please note that the plan is illustrative only.

Without appropriate acknowledgement of the National Gas Transmission assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of National Gas Transmission infrastructure.

We propose modifications to the above policy to include wording to the following effect:

CL2 Renewable Energy and Low Carbon Technology

C. Wind turbine development will subject to compliance with other policies of this plan, be permitted within the areas shown as suitable on the policies map. Additionally, small or medium wind turbines will be permitted within Strategic Employment Sites and employment allocations.

D. Wind Turbine Development will adopt a clear strategy for responding to utilities located within a Site, including National Gas Transmission high-pressure gas pipelines, demonstrating how the National Gas Transmission Design and Principles have been applied and how the impact of the assets has been reduced through good design.

Please see attached information outlining guidance on development close to National Gas Transmission infrastructure. National Gas Transmission also provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Utilities Design Guidance

The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure.

National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around underground gas transmission pipelines and other National Gas Transmission assets.

Further Advice

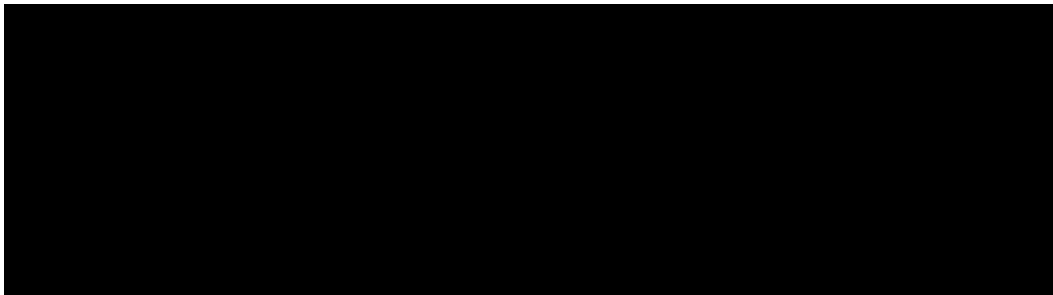
National Gas Transmission is happy to provide advice and guidance to the Council concerning their networks.

Please see attached information outlining further guidance on development close to National Gas Transmission assets. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.



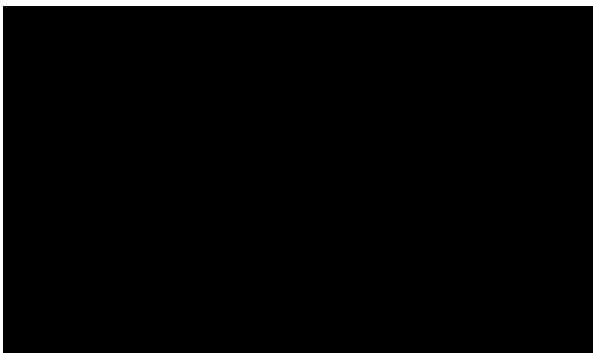
To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Gas Transmission wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Gas Transmission on any Development Plan Document (DPD) or site-specific proposals that could affect National Gas Transmission's assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:



If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

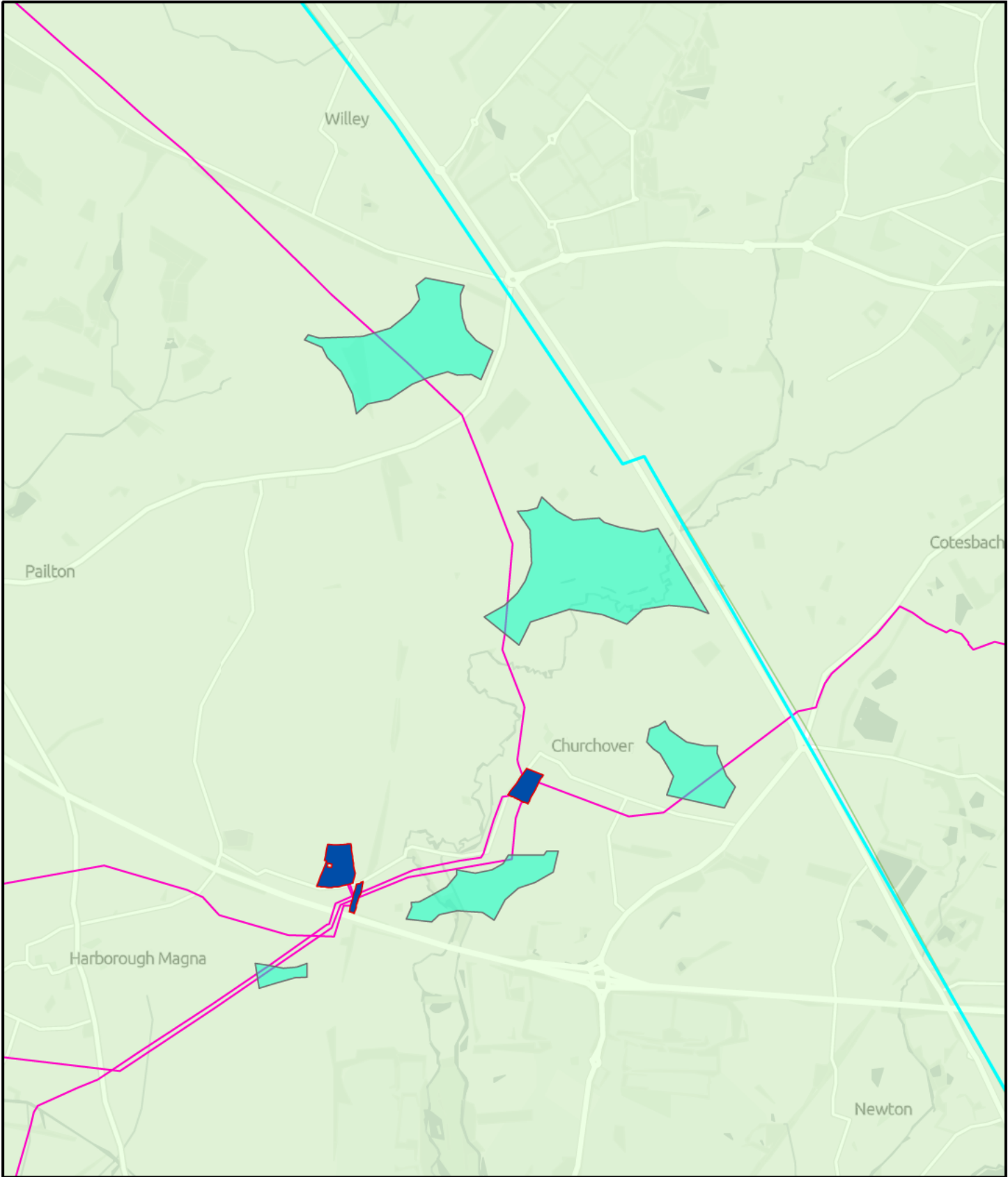
National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

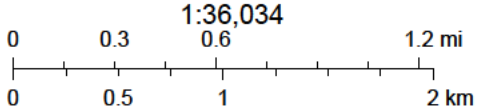
For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com

CL2 - Areas Suitable for Wind Turbine Development - National Gas Map



19/05/2025, 12:09:26

- Development_Plan_Monitoring_v2_7386
- Gas_Assets_7520
- Gas_Assets_6495
- Development_Plan_Monitoring_v2_977_5701
- Development_Plan_Monitoring_v2_977



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