**Lound Neighbourhood Plan**

**Regulation 16 Consultation (7 May to 18 June 2021)**

**Summary of Responses**

This document compiles all of the responses received during the Regulation 16 consultation. Some comments have been summarised for clarity; original copies of the responses have been supplied to the Independent Examiner. Please contact the [Neighbourhood Planning Team](mailto:neighbourhoodplanning@bassetlaw.gov.uk?subject=Sturton%20Ward%20Neighbourhood%20Plan%20(Review):%20Regulation%2016%20Responses) with any queries, including reference to any supplementary documents not included here.

| **Respondent** | Comments |
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| **1: Bassetlaw District Council : Conservation** | **Site NP19: Page 60, Para 179.**  Support for reworded text (as per bold) over Pre–Submission Plan:  *“The site contains large farm storage buildings and hard standing. The site is outside, but immediately adjoining, the Conservation Area* ***and is in the setting of Yew Tree Farmhouse, a grade II Listed Building. As such, any development would need to have regard to this historic setting, the most appropriate types of buildings being of a traditional agricultural style which relate well to the listed Yew Tree Farmhouse in terms of their layout, design and materials. Standard detached suburban-style dwellings are unlikely to be supported.”***  These changes are in line with Conservation’s previous advice. Conservation is supportive of limiting poor inappropriate residential development within the setting of designated heritage assets.  **Policy 12: Development of Site NP19**  Support for new addition (criterion a)) over Pre-Submission Plan:  *“a layout, scale, design and materials which preserve or enhance the setting of the nearby Listed Building and the setting of the adjacent Conservation Area”*  These changes are in line with Conservation’s previous advice. Conservation is supportive of more robust local policy which preserves/enhances heritage interest.  **Policy 13: Development of Site NP21**  Support for reworded text (as per bold) over Pre–Submission Plan:  *“The mature hedgerows along Town Street are character forming (see Map 6), enhance biodiversity and should be protected. Where this is not possible the scheme should minimise their loss by ensuring that the front boundary includes* ***an appropriately designed low wall or traditional post and rail/estate fencing which incorporates a native hedge species that creates private space to allow for the planting of native trees and shrubs.”***  These changes are in line with Conservation’s previous advice. Conservation is supportive of policy which promotes traditional boundary enclosures within historically sensitive areas. |
| **2: Bassetlaw District Council: Planning Policy** | The Council would like to congratulate the Parish Council for producing a clear and comprehensive Neighbourhood Plan. The Plan and its associated documents demonstrate that a significant volume of work has been undertaken by the community, including a series of detailed and well attended consultation events.  Once made, the Council will use the Plan to help it determine local planning applications within the designated area, so it is important that the content, intention and policies are clear for development management purposes and therefore it seeks to achieve the outcomes of the community.  In addition, it is the Council responsibility to make sure Neighbourhood Plans meet the set of Basic Conditions and other obligations as set out by national legislation.  The Council’s response aims to raise points of clarity and make sure the policies – as written – are effective and are used in a way that was intended by the community.  **Housing Requirement**  Although Lound is considered an ‘other Settlement’ through Policy CS9 in the Core Strategy, the Council supports the use of the 5% housing requirement identified for Lound within the emerging Bassetlaw Local Plan – which equates to 10 dwellings. The individual housing requirements have been published within consultation drafts of the Local Plan as indicative housing requirements for neighbourhood plan groups to use if they wish to do so.  **Neighbourhood Plan and Design Codes**  There seems to be discrepancies between the Neighbourhood Plan and the design code document in terms of the number of residential allocations and designations. It might be useful to review this work in line with the latest version of the Neighbourhood Plan.  **Heritage**  Please see the Councils Conservation officer response to heritage related Policies.  **Policy 1: Sustainable Development and the Development Boundary**  When looking at the plan as a whole, Policy 1 seems superfluous and doesn’t really add any value in terms of development management. The majority of the criteria are covered, in more detail, by other policies within the Plan.  It would be clearer if the designations are provided on a ‘Policies Map’ to provide a single point of reference to the various designation maps scattered through the document.  As the plan proposes to meet the identified housing requirement through housing allocations, is it the intention of the community to support additional development beyond the requirement? If not, then is a development boundary and Policy 2 necessary?  **Policy 2: Infill Development and Density**  Although it is good to see the Plan seeking to influence local density, it is unclear whether this would be effective in practice. As Policy 2 only supports small-scale infilling of 1 or 2 dwellings, it could be assumed that these smaller developments would comply with the stated densities within the village?  Is it the intention of the community that Policy 2 only refers to residential development and not other forms i.e. employment?  Paragraph 177 conflicts with the intention laid out in Policy 2 where it will only support new residential development if there is community support.  **Policy 4: Landscape Character**  It is good to see the Neighbourhood Plan focus on local character and develop design codes. When reading the Plan and evidence base work, there are a few discrepancies between the plan and the design code work in terms of the locations and number of views and the identification of Green Gaps, so it might be useful to amend the design code work to reflect the work within the Neighbourhood Plan.  In addition, the design code work includes codes for all potential residential allocations. To be consistent with the sites within the Neighbourhood Plan, it might be useful to remove those sites that the plan isn’t seeking to allocate.  Is the designation of Green Gaps supported by justification?  **Policy 5: Local Green Spaces**  The Council is concerned that proposed Local Green Space 4 is a large size and therefore may conflict with the criteria in paragraph 100 of the NPPF where it states that a Local Green Space should not include a large tract of land. Although this criteria doesn’t specify a size threshold, 29 hectares is a large area proportionally when compared to the size of the other Local Green Spaces and the village. Does the Parish Council own all 29 hectares identified by the designation boundary?  In addition, Local Green Space 2 is also identified as a ‘community facility’ through Policy 11. Some of the policy requirements for these designations conflict with one another.  **Policy 6: Flood Risk and Drainage**  Although flooding is an important issue, the NPPF provides a clear framework for  Areas that are at a high risk of flooding. A Flood Risk Assessment (FRA) may be necessary to justify the risk against the proposed development. A FRA provides the necessary justification for the type and scale of required mitigation. The need for a FRA is based on a site’s size and risk of flooding based on the Environment Agency Flood Zones and surface water flooding information.  As written, part 2 of the policy is considered in conflict with the NPPF because it requires all developments to incorporate SUDS when these may not be necessary.  **Policy 11 Protecting and Enhancing the provision of community**  **Facilities**  Part 3 of Policy 11 states that new community facilities will only be supported within the development boundary, but Community Facility 2 is located outside the development boundary and therefore may conflict with this part of the Policy if new facilities are proposed? |
| **3: Canal and River Trust** | Having reviewed the location of the area covered by the Neighbourhood Plan and the location of our assets, I can confirm that the Canal & River Trust do not wish to provide comments in relation to the regulation 16 consultation. |
| **4: Coal Authority** | Our records do not indicate any coal mining features at surface or shallow depth within the defined Neighbourhood Plan area. On this basis we have no specific comments to make in respect of the Neighbourhood Plan. |
| **5: Historic England** | The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.  If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.  Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:-  <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>  You may also find the advice in “Planning for the Environment at the Neighbourhood Level” useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from:  <http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf>  If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, “Housing Allocations in Local Plans” as this relates equally to neighbourhood planning. This can be found at <https://content.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf/> |
| **6: National Grid (Avison Young)** | An assessment has been carried out with respect to National Grid’s electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.  National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.  National Grid provides information in relation to its assets at the website below.  • www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shapefiles/  Please see attached information outlining guidance on development close to National Grid infrastructure.  **Distribution Networks**  Information regarding the electricity distribution network is available at the website below:  www.energynetworks.org.uk  Information regarding the gas distribution network is available by contacting:  [plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)  **Further Advice**  Please remember to consult National Grid on any Neighbourhood Plan Documents or site specific proposals that could affect our assets. |
| **7: Natural England** | Natural England does not have any specific comments on this Lound Neighbourhood Plan – Regulation 16 Consultation. |
| **8: Nottinghamshire County Council: Highways** | I can confirm that I’ve no objection to the Neighbourhood Plan Submission. |
| **9: Nottinghamshire County Council: Minerals and Waste** | As the Minerals and Waste Planning Authority, it is the responsibility of Nottinghamshire County Council to formulate policies and determine applications relating to minerals and waste. The County Council has the following minerals and waste comments to make in relation to the Lound Neighbourhood Plan.  *Minerals*  In relation to minerals, as recognised within paragraph 21 of the Neighbourhood Plan, the entire neighbourhood area, as identified in Map 1, lies within the MSA/MCA for sand and gravel. The eastern area was historically worked for sand and gravel but this has now ceased. The County Council welcomes the inclusion and reference to the mineral resource and previous extraction within the Neighbourhood Plan. The policies proposed within the Neighbourhood Plan do not appear to conflict with the Nottinghamshire Minerals Local Plan and therefore the County Council does not wish to raise any objections from a minerals perspective.  *Waste*  In relation to waste, there is one waste management facility within the area - the sewage treatment works which falls outside the development boundary identified in Map 16. Considering the policies proposed, the County Council does not wish to raise any objections to the Neighbourhood Plan from a waste perspective. |
| **10. Resident** | Lound residents voted to produce a plan in response to the directives from National Planning and Policy Framework (NPPF) and the directives of Bassetlaw core strategy in order to protect the village from unwanted development.  Lound residents were informed that there would be a requirement originally of 10% dwellings recently reduced to 5 % in the Bassetlaw Draft Plan  93% of the respondents to the village questionnaire wished to keep the village unchanged and 57% wanted no additional housing.  The rural development of some small villages should be viewed on the basis of their importance to the character and nature of the area and not under an umbrella definition for housing development based primarily on size. Lound has this unique character.  The special character of Lound within a SSSI on the Eastern part of the village and open arable land and historical buildings within a conservation area should be given exceptional circumstances to preserve its special character and relationship to the surrounding countryside.  This village should be preserved as it is and development for Lound kept to the same requirements as in the 2011 plan i.e. proposals other than conversion or replacement should not be supported.  The NPPF and District policy on sustainable development states that development should avoid the most valuable agricultural land and area of nature and conservation. I believe Lound falls into this category.  The sites proposed all fall outside the accepted development boundary as defined in the core strategy.  Looking at BDC future housing needs and housing identified to meet these needs Bassetlaw has already fulfilled the tariff set by Central Government. Development in existing rural villages should not be forced on villages if they do not wish to do so.  The three sites NP19 , NP21 North and South identified in the revised site proposals for development of housing, pose problems as outlined in the Bassetlaw Rural Settlement study 2018 on the grounds that Lound has limited local facilities and infrastructures such as sewerage and drainage . Policy 1 point G (para 184 page 61) points to development not exacerbating existing land drainage and sewerage problems to the parish. Sites NP 19, and 21 all refer to upstream issues on drainage and sewers. {Please note NP19 should be classified greenfield as the buildings are in use, housing workshops and farm implements as part of the working farm. All the site choices made from the original 9 proposals fall on the Southern approach to the village. This approach road has already been made more dangerous with the amount of housing development that has taken place on the Lound Low Road in Sutton and the on street parking on the bad bend by people visiting the Gate Pub.  The three housing sites on this approach to the village are on the brow of the hill on entry to the village. This is a blind approach to possible extra traffic signalling left and right and will pose real danger even if the 30 mph sign is moved. Although the villagers voted for 5 final choices, NP02 and NP12 have not been chosen by the Planning Committee presumably on the grounds that the numbers fit the 5% figure and on popularity of votes. However there is an argument for including site NP02 on the grounds of accessibility, to the village, less congestion on a dangerous approach and fewer problems re drainage and sewerage. Finally we refer to Ranskill,  Sutton and Everton which have all produced a plan. All three villages have seen speculative development beyond their housing needs and requirements. What protection can we be assured of if this plan is supported?  We would like to be kept informed of further developments to this plan. |
| **11. Resident** | **Please note:** All seven appendices accompanying this representation were safely received and supplied to the Independent Examiner, but are not included here, as they may not be readable by users of assistive technology. Please contact the [Neighbourhood Planning Team](mailto:neighbourhoodplanning@bassetlaw.gov.uk) if you wish to inspect copies of these documents.  **Grounds against Draft Plan being submitted for examination**   1. Lound draft plan regulation 14 consultation was taken in August and September 2020, at a time of epidemic lockdown. A period when government imposed severe precautions, restricted public activity, and imposed safe access to public facilities. 2. Due to holding regulation 14 consultation at a time of shut down. Elderly residents that form a major part of Lound electorate, right to vote were disenfranchised. 3. The consultation data published in the December and January issues of the Crier (**Appendix A & B**) are now dated, unsafe, and irrelevant. 4. On the basis that due to epidemic restrictions regulation 14 consultation should have been deferred. Deferment would have meant that the fundamental and radical changes to the Local Plan would, or should have been known by residents. 5. It is 6 months since BOC Local Plan was radically changed. Lound residents trust the Crier for news. Few visit BOC Local Plan online. Many still think BOC want to build 42 houses in Lound. The vast majority are not aware of how radical the Local Plan Nov 20 update is. 6. The BOC consultation period started 7 May, ends 18 June. More than ½ the consultation period has already gone. Many residents will be totally confused with the various regulation references in the June Issue of the Crier. 7. Lound Parish Council know the circumstances and are tasked to refer back to residents, should not have submitted our plan for examination.   **Residents Village Survey**  Lound village NHD Plan Residents Survey was published February 2017 and showed an overwhelming wish for Lound residents to retain their existing living environment.  A high proportion of Lound residents are retired, or have family that have flown the nest. Many residents like us, have chosen Lound as the place that they wish to enjoy their retirement. The main finding of the well conducted NHD Plan survey, was that **93% wanted the village to remain unchanged.** The majority of residents did not want to encourage visitors, or evensupport leisure pursuits. **(Appendix C)**  Regardless of Lound residents expressing clear wishes. Our NHD Plan steering group, pressed ahead with its planning mandate for development, by setting about changing attitudes. through fear of the unknown.  ***This was done by the implication, that having a NHD Plan helped to prevent "Unwanted Speculative Building". This was deliberately misleading, and untrue.***  Lound village is now, and as it was then, categorised as being "All other settlements" CS9 / DM3 "No Development". We were encouraged to believe that without a plan unscrupulous building development companies could purchase land and build estates without planning permission. What was not considered, was that our own planning authority that had previously protected against speculative building would itself demand as part of The Local Plan, a 20% housing development burden, (42 houses to be built in Lound).  **BDC Plan 2011 Existing Development village Status**  The existing 2011planning Core Strategy lists Lound as being categorised "All other Settlements" CS9, (**Appendix D**) An extract from the core strategy documentation justifying that decision *(****Appendix E****).*  Lound is even more isolated now than it was then. Until epidemic conditions, train traffic had increased. The Bus service already sparse has reduced even more, and some service now terminates at Sutton. Our nearest shop at Sutton has now closed, and other services are virtually non existent. The wetland SSSI formally known as Lound Gravel Pitts (now known as Idle Valley SSSI) has become now of national importance for breeding birds. The area is now being considered as a habitat for otter, even beaver. Extensive housing development on Suttons green fields are seen by some as a potential threat to these objectives. I put the need of people above that of ducks, but it is not a matter of choice between one, and the other. BOC Local Plan has now met its development target.  **Local Plan Nov 2020**  I became aware that BOC had released the latest information of Local Plan iteration Nov 2020 just before Christmas. As a conservationist I was both surprised and pleased with the radical content of the plan update, and sent the following letter immediately to our Parish Council. ***(Appendix F).*** Subsequently I joined a Parish Council zoom meeting hoping to discuss thesubject further. Again was less than graciously welcomed.  The vast majority of Lound residents, are still in the dark of how the radical Nov 2020 plan update affects our village. Information that was previously communicated promptly in the Crier newspaper, now goes unreported, and BOC itself has not made the information general knowledge.  Aware that our Parish Council was pushing through decisions without residents knowledge. I ask that the Crier publish the following ***(Appendix G).*** It predictably was not published.  **Summary**  Seeing how Lound has been categorised previously, and that the latest  Local Update includes welcomed spatial considerations. Category ST2 status gives Lound controlled conservative development.  At best our plan is now superseded by the Local Plan Nov 20 iteration, and is now irrelevant. At worst it's a potential threat to habitat, and village character. Lound services and infrastructure are limited and poor.  Future events, under certain circumstance could burden Lound with double the development of other local villagers.  Lound Residents Survey showed an overwhelming wish for the village to remain as it is. Not all locations benefit from development. Each vote taken at consultation shows given a choice build quantity our residents choose the least. Residents wish should be respected.  Because of the Neighbourhood Plan mandate to promote, almost intimidate building development. With BDC Local Plan not recognising spatial consideration from the onset of Plan update, has caused loss of Bassetlaw green fields, unnecessary work, and caused angst, at least it has in Lound.  Please keep me in the picture of future developments. |
| **12: Sport England** | Government planning policy, within the **National Planning Policy Framework** (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.  It is essential therefore that the neighbourhood plan reflects and complies with national  planning policy for sport as set out in the NPPF with particular reference to Pars 96 and  97. It is also important to be aware of Sport England’s statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land.  Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document.  <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-forsport#playing_fields_policy>  Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.  <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-forsport#planning_applications>  Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is  important that a neighbourhood plan reflects the recommendations and actions set out  in any such strategies, including those which may specifically relate to the  neighbourhood area, and that any local investment opportunities, such as the  Community Infrastructure Levy, are utilised to support their delivery.  Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England’s guidance on assessing needs may help with such work.  <http://www.sportengland.org/planningtoolsandguidance>  If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.  <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-costguidance/>  Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.  In line with the Government’s NPPF (including Section 8) and its Planning Practice  Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.  Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be  used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.  NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>  PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>  Sport England’s Active Design Guidance: <https://www.sportengland.org/activedesign> |
| **13: Severn Trent Water** | Thank you for the opportunity to comment on your consultation, Severn Trent are generally supportive of the principles outlined within the Lound Neighbourhood Plan, However there are a few amendment that we feel could provide additional benefits to both the objectives of the plan and wider benefits.  **Neighbourhood Planning Policy 1: Sustainable Development and the Development Boundary**  Severn Trent are supportive of the principles outlined, in particularly in bullet point g we welcome the addition of the drainage hierarchy within this bullet point as advised previously.  In relation to bullet point h to ensure that development does not exacerbate existing sewerage problems it is important that developer contact Severn Trent with their proposals to enable appropriate assessments and where required capacity improvements to be carried out. To reduce the impact of development it is important that surface water is appropriately management through the use of SuDS and the Drainage Hierarchy (Planning Practice Guidance Paragraph 80).  **Neighbourhood Plan Policy 3: Protecting and Enhancing Biodiversity**  Severn Trent are supportive of the approach to protect and enhance biodiversity, it is noted that bullet point 1d details that the natural flow of water through watercourses is maintained, we welcome this addition in line without previous comments to the draft Neighbourhood Plan. We also support the development of these as blue green corridors such that the watercourses are incorporated into the landscaping and open space.  It is noted that there is no longer a reference to “encouraging the creation of SuDS, (e.g. rain gardens, pond and wetland creation) in new schemes and ‘retrofitting’ where appropriate” within Policy 3 Severn Trent would recommend that this paragraph is re-instated to support the delivery of SuDS in particular Retro-fit SuDS being considered within Lound.  **Neighbourhood Plan Policy 5: Designation of Local Green Spaces**  Severn Trent understand the need for Important Open Space and the need for it to be protected, however open spaces can provide suitable locations for schemes such as flood alleviation to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space in the form of biodiversity or amenity improvements. We would therefore recommend that the following point is added to Policy R5 to support the delivery of flood alleviation projects where required within green spaces.  ***Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.***  **Neighbourhood Plan Policy 6: Flood Risk and Drainage**  Severn Trent are supportive of the principles outlined within policy 6 but would raise concerns about the deliverability of the policy.  Minor development (as defined by the Town and Country Planning Act) is not required to install SuDS under NPPF or the Written Ministerial Statement for Sustainable Drainage (HCWS 161). As such the implementation of SuDS on development of this scale may be difficult to enforce.  In addition, development cannot be required to fix existing problems therefore the development of a site to provide a net decrease in surface water whilst desirable again may be difficult to enforce. We would recommend that you obtain further advice from the Lead Local Flood Authority (LLFA) regarding this policy as they will be the statutory consultee advising the Local Planning Authority (LPA) regarding any major planning applications and may provide some support to the LPA for minor developments.  **Neighbourhood Plan Policy 7: Achieving High-Quality Design**  Whilst it is appreciated that some of these aspects have been covered under different policies, but as this policy relates to design it is felt that it is important that design requirements are all still considered within this policy. In particular:  1) Sustainable Drainage systems (SuDS)  2) Implement the principles of the Drainage Hierarchy  3) Incorporate water efficient design and technology  **Drainage Hierarchy**  The drainage hierarchy outlined the principles of where surface water should be discharged, the hierarchy is outlined within Planning Practice Guidance paragraph 80 (Reference ID: 7-080-20150323). Severn Trent request evidence that the drainage hierarchy has been followed by developers in our conversations, however by raising the expectation at the Neighbourhood Plan stage it consideration can be incorporated into the initial a site designs resulting it better continuity of surface water through development.  To aid in the interpretation of this request we would recommend that the following wording is incorporated into Policy R1:  ***All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems are avoided, where possible.***  **SuDS (Sustainable Drainage Systems)**  Severn Trent note that Planning Policy already requires major development to incorporate SuDS through the written Ministerial Statement for Sustainable Drainage (HCWS 161) and NPPF. However current policy is very flexible on how SuDS can be incorporated into development, by incorporating appropriate references to SuDS in Policy R1, the need for developers to deliver high quality SuDS can be secured. Current Industry Best Practice for SuDS (The SuDS Manual CIRIA C753) highlights the need to consider SuDS from the outset of the design process and not to fit SuDS to the development site post layout. To aid in the delivery of this recommendation we would recommend wording to the effect of:  ***All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are put in place unless demonstrated to be inappropriate.***  ***All schemes for the inclusions of SuDS should demonstrate they have considered all four aspects of good SuDS design, Quantity, Quality, Amenity and Biodiversity, and the SuDS and development will fit into the existing landscape.***  ***The completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure that the SuDS are maintained in perpetuity.***  ***Where possible, all non-major development should look to incorporate these same SuDS principles into their designs.***  The supporting text for the policy should also include:  *Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.*  We would also note that as the Lead Local Flood Authority (LLFA) are the statutory consultee for the planning process in relation to surface water management that they should also be consulted on any wording regarding SuDS.  **Water Efficiency**  Water efficient design and technology is important for ensuring the sustainability of the water supply system for the future, both supporting existing customers and future development. NPPF supports the delivery of sustainable development and the Humber River Basin Management Plan promotes the use of the tighter Water Efficiency Target within Building Regulations Part G. We would recommend that this detailed with Policy R1 so that developers are aware of what is expected of them from the outset of the design process.  To aid with the implementation fop the recommendation we have provided some example wording below:  ***All development should demonstrate that they are water efficiency, where possible incorporating innovative water efficiency and water re-use measures, demonstrating that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day.***  **Neighbourhood Plan Policy 8: Energy Efficiency in Design**  Severn Trent are supportive of the approach to incorporate water efficiency into the energy efficient design as there are a number of water efficient technologies that also provide energy efficiency primarily through the reduced need to heat water.  **Neighbourhood Plan Policy 12: Development of Yew Tree Farm site and outbuildings (NP19)**  Severn Trent would note that this development is upstream of the known network constraints, However because the site is small-scale in nature and a brownfield development site we are not anticipated any significant increase in flows from this development. It is however important that SuDS are incorporated into the site to manage surface water, and that surface water flows are restricted as close as possible to greenfield conditions through the use of SuDS, where this is achieved it may be possible to have a positive impact on the performance / resilience of the sewerage system.  The site is located in close proximity to a surface water sewer therefore no surface water should be permitted to drain to the foul sewer network. It is strongly recommended that developers contact Severn Trent to ensure that the impact of the development proposals can be assessed.  We note that the site-specific policy for NP19 refers to the need to incorporate SuDS and the drainage hierarchy within bullet point g. We would support the use of SuDS principles within the development and the use of the Drainage Hierarchy.  **Neighbourhood Plan Policy 13: Development of Land east of Town Street (NP21 north)**  Severn Trent are aware that there are Foul Sewers indicated to be located within the site, it is therefore important that developers contact Severn Trent to understand the impact these sewers will have on the development and ensure that the sewerage assets are protected.  Severn Trent would also note that this development is upstream of the known network constraints, However because the site is small-scale in nature we would not anticipate any significant changes to the performance / resilience of the sewer network, provided surface water is managed sustainably and discharged to a sustainable outfall in accordance with the drainage hierarchy. Where any discharge of surface water is proposed to the surface water or foul sewerage system it is vital that developers engage with Severn Trent to ensure that the impact of development can be assessed.  We note that the site-specific policy for NP21 North refers to the need to incorporate SuDS and the drainage hierarchy within bullet point g. We would support the use of SuDS principles within the development and the use of the Drainage Hierarchy.  **Neighbourhood Plan Policy 14: Development of Land east of Town Street (NP21 south)**  Severn Trent are aware that there are Foul Sewers indicated to be located within the site, it is therefore important that developers contact Severn Trent to understand the impact these sewers will have on the development and ensure that the sewerage assets are protected.  Severn Trent would also note that this development is upstream of the known network constraints, However because the site is small-scale in nature we would not anticipate any significant changes to the performance / resilience of the sewer network, provided surface water is managed sustainably and discharged to a sustainable outfall in accordance with the drainage hierarchy. Where any discharge of surface water is proposed to the surface water or foul sewerage system it is vital that developers engage with Severn Trent to ensure that the impact of development can be assessed.  We note that the site-specific policy for NP21 South refers to the need to incorporate SuDS and the drainage hierarchy within bullet point g. We would support the use of SuDS principles within the development and the use of the Drainage Hierarchy. |