**Sturton Ward Neighbourhood Plan (Review)**

**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** | **Paragraph 11.2**  Proposed re-wording, as per text in bold:  *Consultation feedback showed that local people cherish the character of their built and natural environment. The Plan area is rich in its amount and variety of heritage (buildings and spaces****). Many of these are regarded as designated heritage assets, (Listed Buildings, Scheduled Ancient Monuments etc…) and are included on the National Heritage List for England, which is overseen by Historic England. However, there are some buildings which are regarded as ‘locally listed’, and are monitored by BDC, who have produced their own guidance and criteria concerning Locally listed Buildings, otherwise known as non-designed heritage assets.***  **Paragraph 11.7**  Proposed re-wording, as per text in bold:  *Listed buildings, scheduled monuments, the Conservation Area and* ***their*** *setting are protected in accordance with District and National policies*  **Design Code**  Conservation raised 2 concerns with regard to the Pre-Submission Draft Design Code in June 2020. These related to:   * the inclusion of the site adjacent to the Sun Inn in North Wheatley (BDC07), and * the site east of Tavistock House in South Wheatley (NP32).   In both cases, Conservation regards the allocation of these sites as unacceptable in terms of the impact on designated heritage assets. Indeed, An application for Planning Permission for the Sun Inn site was refused in 2020 and the subsequent appeal was dismissed. These proposed allocations were therefore removed from the latest version of the Neighbourhood Plan.  However, these sites are still referred to in the Design Code. This recommends development on both sites where is has been considered to be unacceptable in heritage terms. Therefore, these parts should be removed from the Design Code, as they are not part of the Neighbourhood Plan.  The same goes for site NP19 (Gainsborough House, North Leverton) and site NP23 (Yew Tree Farm, North Leverton), both of which are highlighted as suitable for allocation in the Design Code, but do not form part of the final version of the NP and are not supported by Conservation. |
| **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. Points raised here, will make sure that these are clarified through the examination process.    **Housing Requirement**  Although the settlements of North and South Wheatley, North Leverton and Sturton le Steeple are considered an ‘Rural Service Centres’ through Policy CS8 in the Core Strategy, the Council supports the use of the 5% housing requirement identified for the settlements within the emerging Bassetlaw Local Plan. 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. In the case of Sturton Ward, the Neighbourhood Plan is proposing more growth than identified through the residential requirement in the emerging Local Plan. When reading the document it  **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, infill and the Development Boundary**  The plan seeks to manage future development through a mixture of residential allocations and windfall developments within the development boundaries in individual settlements. Although it is noted that two of the village has already met their requirement and this should be made clear within the supporting text.  Policy 1, as written, is supporting additional residential development in settlements through a combination of allocations and appropriate infilling within development boundaries. Due to this, is there a need for part 3 of the Policy which enables some residential growth to occur outside the development boundary when the requirement has already been achieved inside the development boundaries?  Part 1(a) is this necessary when you’ve met the requirement through allocations and commitments?  If the Parish Council are supporting growth outside the development boundary, then this should be linked to the need for affordable housing that otherwise cannot be delivered inside the development boundaries.    **Policy 2a: Protecting the landscape character, significant green gaps and key views**  As the majority of the green gaps are outside the development boundary, wouldn’t these areas already have some protection through the open countryside policies within the Core Strategy and NPPF? Some of the Green Gaps appear to be in areas that have a low risk from the impact of development and away from settlements.  Are the views identified within the Neighbourhood Plan, the same as those listed within the Design Codes? The maps identifying the views do not appear in the design code assessment.  Parts 2 and 3 of the policy do not quantify what would constitute a negative impact on a Green Gap. What are the positive attributes for each of the Gaps?  There is potential for confusion by repeating the numbering for the green gaps in each settlement. It may be clearer to use a unique number for each green gap.  **Policy 3: Designation of local green spaces**  There is potential for confusion by repeating the numbering for the local green spaces in each settlement. It may be clearer to use a unique number for each local green space.  Local Green Space (1) on Map 8a appears to include an outbuilding for a neighbouring property to the south of the site.  Local Green Space (6) on Map 8c appears to include the church.  Local Green Space (8) on Map 8c appears to include the access points into the adjacent field.  **Policy 6: Flood Risk and Drainage**  Although flooding is an important issue, the NPPF provides a clear framework for  In areas at a higher 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 sites size and risk of flooding based on the Environment Agency Flood Zones and surface water flooding information.  **Policy 7: Tourism development**  This appears confusing on what types of development it would support in terms of the visitor economy, would it be better to link this with Policy 8 as it forms part of the local economy.  **Policy 9: Improving broadband and mobile connectivity**  Is Policy 9 a deliverable policy? The majority of these infrastructure asks are considered outside of the planning process.  **Policy 10: Housing mix and type**  Part 2 of the Policy - What would be considered an appropriate walking distance to facilities within a rural setting?  **Policy 11: Community facilities**  Could the identified community facilities be mapped and labelled?  Some of the identified community facilities are also designated as Local Green Spaces and therefore provides a conflict between policies 11 and 3.  Part 5 of the Policy is confusing, does this include the redevelopment and/or change of use of an existing community facility? i.e. the church into another community function?  **Policy 12: Energy efficiency, renewable energy and climate change**  As currently written, the Policy only supports low carbon developments on residential development, is this the intention?  In addition, it appears, through the criteria in the Policy, that development of this type would be supported within open countryside?  Could this policy be linked with Policy 1 and Policy 5?  **Policy 13: Development of buildings opposite Solent, Top Street (NP36)**  Is part 2 of the policy necessary when the site is not located within an area of flood risk?  Have the highway concerns been addressed?  **Policy 14a: Development of Land between Roses Farm and Four Paws, Station Road (NP02)**  Is part 2 of the policy necessary when the site is not located within an area of flood risk?  **Policy 14b: Development of land north of The Barn, Cross Street (NP05)**  Is part 2 of the policy necessary when the site is not located within an area of flood risk?  **Policy 14c: Development of and buildings north of Station View Farm, North Street (NP06)**  Is part 2 of the policy necessary when the site is not located within an area of flood risk?  **Policy 14d: Development of land east of Woodcotes, Freemans Lane (NP08)**  Is part 2 of the policy necessary when the site is not located within an area of flood risk?  **Policy 15a: Development of land north of Mill Close, Manor Grove and Main Street (NP18)**  Is part 2 of the policy necessary when the site is not located within an area of flood risk?  **Policy 15b: Development of the Old Shop, south of Main Street (NP31)**  Is part 2 of the policy necessary when the site is not located within an area of flood risk? |
| **3: Canal & River Trust** | The Trust are the Navigation Authority for the River Trent, which demarks the eastern boundary of the Neighbourhood Plan area. Having viewed the draft Neighbourhood Plan, we wish to make the following comments:  **Vision Statement**  As Navigation Authority for the River Trent, we welcome the welcome the retention in part e) of paragraph 5.1 of the focus upon maintaining and enhancing the environment and landscape. This could help to ensure that the landscape around the River Trent, experienced by our users, is enhanced during the plan period. In addition, it could help to ensure that biodiversity associated with the River Trent, and associated Local Nature Sites, can be protected and enhanced.  **Community Objectives**  We welcome objective 1, which could help to ensure that biodiversity associated with the River Trent, and associated Local Nature Sites, can be protected and enhanced.  In previous correspondence, we have suggested that the Community Vision could be amended so that it considers the impact of Rural developments outside settlement boundaries, such as farmsteads of infrastructure works within the Rural areas of the Ward. We therefore welcome the latest wording of Objective 4 which includes reference to the Rural Landscape.  **Neighbourhood Plan Policies**  Policy 2a Protecting the Landscape Character  We welcome the proposed policy wording, which focusses upon the need for development to not negatively impact upon landscape character. This would include any impact upon the landscape as seen from the River Trent.  Policy 2b Enhancing Biodiversity  We welcome the proposed policy wording, notably with regards to the promotion of wild flower meadows, native planting, and habitat enhancement measures, which could all benefit biodiversity associated with the River Trent corridor.  The supporting information in the plan accurately reflects the location of wildlife sites associated with the River Trent, which will make it clearer to decision makers over where key sensitive habitats are present. |
| **4: Coal Authority** | I have reviewed our records and can confirm that the identified Neighbourhood Plan area contains no recorded risks from past coal mining activity at surface or shallow depth and no records of surface coal resource. On this basis the Coal Authority has no specific comments to make on the policies or proposals within the Neighbourhood Plan. |
| **5: Highways England** | Highways England welcomes the opportunity to comment on the Draft Submission version of the Sturton Ward Neighbourhood Plan which covers the period of 2021 - 2037. The document provides a vision for the future of the area and sets out a number of key objectives and planning policies which will be used to help determine planning applications.  Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Sturton Ward Neighbourhood Plan, our principal interest is in safeguarding the operation of the A1 which is located approximately 10km to the south and west of the Plan area.  We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Sturton is required to be in conformity with the adopted Bassetlaw Draft Local Plan and this is acknowledged within the document.  From our review of the Neighbourhood Plan, we note that no employment sites have been allocated within the limits of Sturton Ward. However, we understand that new proposals which provide for local needs will be supported within the parish limits, as outlined within Policy 5: Design Principals and Policy 8: Supporting Local Economy.  We note that 7 housing sites have been allocated within Sturton Ward, however these sites are subject to a minimal number of dwellings which range from 1 to 3 homes per site.  Due to the minimal growth planned for the area we do not consider that there will be any material impacts on the operation of the SRN.  We have no further comments to provide and trust that the above is useful in the progression of the Sturton Ward Neighbourhood Plan. |
| **6: 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/> |
| **7: National Grid (Avison Young)** | Following a review of the above document we have identified the following National Grid assets as falling within the Neighbourhood area boundary:  **Electrical Substation: WEST BURTON 400KV**  **Electrical Substation: WEST BURTON 132KV**  **400Kv Underground Cable route: WEST BURTON 400KV S/S**  **4ZM ROUTE TWR (448 - 630): 400Kv Overhead Transmission Line route: BICKER FEN -SPALDING NORTH - WEST BURTON**  **4VE ROUTE TWR (001A - 020A): 400Kv Overhead Transmission Line route: COTTAM - KEADBY 1**  **ZDA ROUTE TWR (210D - 227A): 400Kv Overhead Transmission Line route: COTTAM – WEST BURTON**  **ZDA ROUTE TWR (190 - 210A - 4VE001A): 400Kv Overhead Transmission Line route: COTTAM - KEADBY 1**  **4TM ROUTE TWR (001 - 081): 400Kv Overhead Transmission Line route: KEADBY – WEST BURTON 1**  A plan showing details of National Grid’s assets is attached to this letter. Please note that this plan is illustrative only. National Grid also 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. |
| **8: Natural England** | Natural England does not have any specific comments on this neighbourhood plan. |
| **9: Nottinghamshire County Council: Highways** | The Highway Authority has no objection to the Neighbourhood Plan Submission.  I do not necessarily agree with the ‘Street dimensions’ section of the Design Code, in particular the figures. The cross-sections include tree lined verges interspersed with parking bays. Unless carefully considered, this would likely give rise to visibility issues for motorists emerging from private driveways and could create severance for pedestrians wishing to cross a street. The tree species would require careful consideration in terms of canopy spread and clearance from carriageways both horizontally and vertically. It must also be ensured that sufficient space would be available to ensure adequate uncompacted soil volume to allow the trees a chance of reaching maturity. However, the size of the allocations are unlikely to require a street for access, and any streets that are required would be unlikely to be required to a standard that resembles a tree lined boulevard with formal on street parking provision. |
| **10: 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 Sturton Neighbourhood Plan.  *Minerals*  In relation to Minerals, as recognised within the Plan in paragraph 2.6, the Eastern part of the designated neighbourhood plan area falls within the Mineral safeguarding and consultation area for sand and gravel, with there being an active permission for sand and gravel extraction at Sturton quarry. Sturton quarry is allocated under Policy MP2c: Sand and gravel provision, in the Nottinghamshire Minerals Local Plan (adopted March 2021) that, alongside other allocations, will enable a steady and adequate supply of sand and gravel across the County during the mineral plan period (up to 2036). Whilst work has commenced on creating the access to the quarry, the quarry is currently not operational. Paragraph 2.6 references a recent application submitted to Nottinghamshire County Council (1/20/00605/CDM) which was granted on 30th June 2020 deferring the submission of a revised restoration scheme for two years. This permission does not alter the tonnage to be extracted at the quarry or extend the life of the quarry, however, as before, a further application may be submitted to extend the life of the quarry.  The County Council welcomes the inclusion and reference to the mineral safeguarding and consultation area and the permitted quarry within the Neighbourhood Plan. Overall, considering this and the policies proposed, the Neighbourhood Plan should not pose a safeguarding concern in relation to the mineral resource or the permitted quarry and therefore the County Council does not wish to raise any objections from a minerals perspective to the Sturton Neighbourhood Plan.  *Waste*  The policies within the Sturton Neighbourhood Plan do not appear to conflict with the Nottinghamshire and Nottingham Waste Core Strategy or Waste Local Plan and therefore the County Council does not wish to raise any objections from a waste perspective. |
| **11: Nottinghamshire County Council: Transport and Travel Services** | Nottinghamshire County Council Transport and Travel Services (TTS) provide the following observations as part of the consultation in respect of the Sturton Ward Neighbourhood Plan and supporting documents covering the parishes of North and South Wheatley, North Leverton with Habblesthorpe and Sturton Le Steeple.  *Background*  The Transport Act 1985 places a duty on Nottinghamshire County Council to secure a “Socially necessary” bus network. Local bus operators provide services that they consider as commercial, and the Council provide revenue subsidies to provide additional services to ensure communities have access to essential services including education, work, health, shopping and leisure.  The level of revenue funding available to the Council to provide supported services is diminishing. Therefore, other funding sources are required to enable the council to maintain a socially necessary and sustainable network.  *Current Public Transport Network*  The plan area is currently served by Stagecoach service 95, operating a 2-hourly daytime service between Retford and Gainsborough. Bus services in this area are currently under review.  *Future Public Transport Network*  Section 3.16 summarises the position at the time of the Regulation 14 consultation.  Nottinghamshire County Council has recently been successful with a bid to the Department for Transport Rural Mobility Fund to provide pre-bookable Demand Responsive Transport (DRT). The services will connect communities in north-east Nottinghamshire, including Sturton Ward, with local towns for employment education, shopping, leisure, healthcare, and essential services under the NottsConnect banner.  They will complement, and integrate with, the conventional network, through timetable coordination, through-ticketing and a new interchange hub in Ollerton. It will help sustain bus services after the COVID-19 pandemic. The indicative start date for the service is summer 2022.  Appendix D - letter from North Laverton Surgery dated 11.12.19 is noted, including the comments referring to improved transport links to Retford from North Leverton, to allow new patients more choice in terms of choosing with which surgery to register. The proposed future format for service delivery in this area should assist with providing better journey options for accessing health, shopping and other essential services.  *Neighbourhood Plan*  TTS have reviewed the Plan, including the Community Vision, Community Objectives, Neighbourhood Plan policies, Site Allocations and Developer Contributions. The Plan and the emphasis on sustainable development is supported, including the following:  · reference to the Bassetlaw Core Strategy, Policy CS1 stating that the three main villages in the Plan area , “rural service centres”, are defined as offering “a range of services and facilities ...and access to public transport  · Policy 1: e) promoting walking, cycling and the use of public transport  For this to be achieved, it is important that public transport facilities and infrastructure meet local needs. It is suggested that section C of the Community Vision statement is enhanced to include reference to current public transport facilities, and the potential for future development set out above.  **Section 18, Developer Contributions** – The role of developer contributions in respect of new development is an important addition to the plan. Table 1a and 1b sets out the requirement for 47 homes in the Sturton Ward area based on a target of up to a 20% increase over the plan period to 2037.  The Community Aspiration for Developer Contributions at Section 18.5 is noted. TTS request that developer contributions towards improved public transport services (where justified) and infrastructure is specified as a criterion to be met for a site to be supported, and that sites/schemes that afford access to existing public transport facilities should be given priority for development.  *Community Transport*  Bassetlaw Action Centre operate a social car scheme, a fully accessible Car Scheme **Plus** and community minibus providing access for rural communities which complement the local bus network. |
| **12: Resident** | As a resident of North Wheatley, also a Parish councillor for 42 years and a member of the panel who constructed the plan, I want to make you aware of the descension amongst both the panel and the villagers.  We were mainly in total agreement until Bassetlaw moved the goal posts. We had agreed sites and the needs of each village.  With regard to North and South Wheatley, it was then immediately decided that we needed no further housing except the properties already having permission, (all large houses).  The campaign, over many years to permit small amounts of development for downsizing and starter homes was swept away by the protectionists and we are back to square one. Tight boundaries have been re imposed.  Older residents who wish to remain in the village will now have to stay in their big properties or move away. Any young people of moderate means will have no chance of buying the huge houses already being built.  This issue has been dear to my heart for many years. I want our village to grow sensibly and moderately and thus PROSPER for all age groups. We are already getting the reputation of a snob village where only the affluent can afford to reside.  Please remember these issues when you study our plan otherwise we will become just a back water where there is no community growth! |
| **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 Submission version of the Review Plan, there are however a few areas that we feel could benefit from minor alterations to better support the plan Vision and deliver wider benefits.  **Policy 2a: Protecting the Landscape character, significant green gaps and key views**  Severn Trent are generally supportive of this policy particularly the reference in bullet point 4,c  *“maintain the natural flow of water through water courses and prevent surface water from being connected to the foul sewerage network.”*  We would also note that retrofitting SuDS into some of these significant Green Gaps could facilitate greater flood resilience and increased biodiversity and amenity benefits without having an significant adverse impact on the functionality of the green gaps. We would therefore recommend that policy 2a recognises these potential benefits and supports the delivery in principle of flood alleviation / retro fit SuDS Schemes in these locations.  **Policy 2b: Enhancing Biodiversity**  Severn Trent are supportive of the approach outlined with bullet point 1a as it highlights the need to protect our watercourses becoming enclosed and highlights a number of different benefits the open features provide, these open features are vital for the sustainable management of surface water.  We are also supportive of the approach outlined in bullet point 1d regarding the inclusion of SuDS as the management of surface water within development site or through Retro-fit SuDS is Essentrial to mitigating the impacts of climate change on the urban environment including the performance of the sewerage system. We would however highlight that SuDS are intended to provide multiple benefits, (water Quantity, Water quality, Biodiversity and Amenity) We would recommend that this is also highlighted within bullet pointd to ensure that developers are aware of the type of SuDS required.  In addition to the use of SuDS it is vital that the outfall for surface water is considered such that it is not connected into the sewer system whenever possible. We would therefore recommend an inclusion of a reference to the Drainage Hierarchy within Policy 2b.  **Policy 3: Designation of Local Green Spaces**  Severn Trent understand the need for Local Green Space and the need for it to be protected, however local green 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 3 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.***  **Paragraph 11.19**  Severn Trent are supportive of the approach outlined within paragraph 11.19, but would recommend that this paragraph of a subsequent paragraph highlights the need to connect in accordance with the Drainage Hierarchy.  **Policy 4: Reducing the risk of Flooding**  Severn Trent are supportive of the principles outlined within Policy 4 in such that it promotes the need for developers to liaise with Severn Trent, incorporate SuDS and reduce water consumption in line with the optional Target outlined within Building Regulations Part G. We would note that the management of surface water is vital to ensuring the resilience of the sewerage system to the impacts of climate change and growth. It is therefore important that surface water is discharged to the most sustainable outfall. We would therefore recommend that Policy 4 also references the need to follow the Drainage Hierarchy as outlined within Planning Practice Guidance Paragraph 80.  To aid in the interpretation of this request we would recommend that the following wording is incorporated into Policy 4:  ***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.***  **Policy 5: Design Principles**  Whilst Severn Trent accepts that some of these elements have been covered or we are also proposing are covered under different policies, we would still recommend that policy 5 highlights key design considerations about the performance of development sites. This is particularly important when considering how development is built to manage surface water sustainably and utilise resources sustainably during use. To this effect we would recommend that Policy 5 highlights the need for development to incorporate:  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: 7-080-320150323). 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 5:  ***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 5, 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 5 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.***  **Policy 12: Energy Efficiency, renewable energy and climate change**  Severn Trent are supportive of the approach to incorporate Water efficiency within the energy efficiency policy as a number of water efficient technologies and design processes also support energy efficiency through the reduced need to heat water.  **Policy 14a: Development of Land between Roses Farm and Four Paws, Station Road (NP02)**  Severn Trent would not raise any concern regarding the development of 3 dwellings at this location, due to the small scale nature of the development is it unlikely that there will be any detriment on the sewerage network provided surface water is managed sustainably and discharge in accordance with the Drainage Hierarchy.  **Policy 14b: Development of Land north of the Barn, Cross Street (NP05)**  Severn Trent would not raise any concern regarding the development of a single dwelling at this location, due to the small scale nature of the development is it unlikely that there will be any detriment on the sewerage network provided surface water is managed sustainably and discharge in accordance with the Drainage Hierarchy.  **Policy 14c: Development of and buildings north of Station View Farm, North Street (NP06)**  Severn Trent would not raise any concern regarding the development of a 2 dwellings at this location, due to the small scale nature of the development is it unlikely that there will be any detriment on the sewerage network provided surface water is managed sustainably and discharge in accordance with the Drainage Hierarchy.  **Policy 14d: Development of land east of Woodcotes, Freemans Lane (NP08)**  Severn Trent would not raise any concern regarding the development of a single dwelling at this location, due to the small scale nature of the development is it unlikely that there will be any detriment on the sewerage network provided surface water is managed sustainably and discharge in accordance with the Drainage Hierarchy.  **Policy 15a: Development of land north of Mill Close, Manor Grove and Main Street (NP18)**  Severn Trent would not raise any concern regarding the development of a 10 dwellings at this location, due to the small scale nature of the development is it unlikely that there will be any detriment on the sewerage network provided surface water is managed sustainably and discharge in accordance with the Drainage Hierarchy.  **Policy 15b: Development of the Old Shop, south of Main Street (NP31)**  Severn Trent would not raise any concern regarding the development of a 2 dwellings at this location, due to the small scale nature of the development is it unlikely that there will be any detriment on the sewerage network provided surface water is managed sustainably and discharge in accordance with the Drainage Hierarchy. |