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Following the Regulation 16 consultation for Stanton Drew Neighbourhood Plan, the examiner identified that the original Consultation Statement did not fully meet Neighbourhood Planning Regulations. Therefore, a revised Consultation Statement was published for comment.

The consultation took place under Regulation 16 of the Neighbourhood Planning Regulations, for a period of 6 weeks between the 8th June to 20th July 2020

The representations received can be viewed below along with a summary of the comments made. These will be passed to the examiner for consideration. The examiner will advise if the Neighbourhood Plan can proceed to community referendum.

## Stanton Drew NDP - Regulation 16 Representations Summary

Date	Respondent	Organisation	Comments
08/06/2020	Chrystèle Garnier	Highways England	<p>Thank you for providing Highways England with the opportunity to comment on the Stanton Drew Neighbourhood Development Plan Reg 16 consultation. Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this case consists of the A36 to the east of the plan area.</p> <p>As the plan area is some distance from our network, we are therefore satisfied that the proposed plan policies are unlikely to result in development which will impact significantly on the SRN and we have no comments to make. However, this response does not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the appropriate policy at the time.</p>
15/06/2020	David Stuart	Historic England	I can confirm that we have no comments to submit
28/06/2020	Simon Whittle		<p>I have read the revised consultation document and am happy with the revised documents and the level of consultation that has taken place. I very much look forward to the plan proceeding to a successful referendum.</p> <p>I'd also like to thank everyone who has continued to be involved in the project.</p>
29/06/2020	Matt Verlander	Avison Young on behalf of National Grid	National Grid has identified that it has no record of such assets within the Neighbourhood Plan area
08/07/2020	Melanie Lindsley	Coal Authority	<p>We previously commented on the Stanton Drew Neighbourhood Plan in a letter to the LPA dated 31 December 2019.</p> <p>I have reviewed the revised consultation and can confirm that the Coal Authority has no additional comments to make.</p>
20/07/2020	Simon Waller		<p>Page 4 : "Since the beginning of 2013 the Parish Council (PC) and NP Steering Group have invited parishioners to engage with the neighbourhood plan process"</p> <p>The main reason the plan has taken 7 years to get to this point is that this neighbourhood plan has been developed by a few people with a vision for the village, but that vision is not what the majority of the parishioners want. Please check the original videos of the Stanton Drew NHP consultation referenced on page 10 of this document (<a href="https://www.youtube.com/watch?v=PPhL0pH7-nc">https://www.youtube.com/watch?v=PPhL0pH7-nc</a> and <a href="https://www.youtube.com/watch?v=OS14823Nm24">https://www.youtube.com/watch?v=OS14823Nm24</a>)</p> <p>Notice that the Site Options Long List (SOLL) of over 20 sites had been created at this very early stage, before any surveys had been conducted to understand the parishioners' views. At no point has it been explained to the parishioners over the last 7 years that a site options long list is not a requirement for a Neighbourhood Plan and indeed is very unusual for a neighbourhood plan, especially in a green-belt protected area.</p> <p>Page 4 : "A Site Options Long List (SOLL) was a desk top exercise, conducted in line with similar desk top exercises, to evaluate the appropriateness, or otherwise of sites within the Parish for development. This list was analysed for suitability against national and local planning policy, which resulted in a large number of land parcels being declared not appropriate. It was initially intended to reference the remaining options in the Plan, however, due to significant parishioner dislike of the SOLL received during feedback on the Draft Plan, it was decided not allocate sites for development, but to retain the SOLL as part of the evidence base."</p> <p>This acceptance that the Site Options Long List is not wanted by the parishioners, but then is still retained as part of the evidence base, goes to the heart of the issues with this plan. Over 3 pages in this consultation statement document (Pages 4 to 7) provide a list of meetings and communications with the public, but the final plan ends up very similar to the original vision set out by the Neighbourhood Plan team in the video.</p> <p>My largest concern is that at no point in this document or any other document in the neighbourhood plan has it been explained to the parishioners that the combination of the site options long list + a housing needs survey (neither of these are requirements of a neighbourhood plan) is the key to unlocking currently protected land outside the housing development boundary for housing developments used as rural exceptions sites - Policy RA4 of BANES Core Strategy Policy : P143 : (<a href="https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/cs_pmp_vol_1_district-wide.pdf">https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/cs_pmp_vol_1_district-wide.pdf</a>).</p> <p>These points lead me to believe that this Neighbourhood plan is not a plan that the parishioners want, and that it will not be supported in a vote. We need a neighbourhood plan that delivers the appropriate protection for our parish and does not create a basis for unlocking currently protected land to be used for the development of houses that are not needed.</p>

## George Blanchard

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**From:** Garnier, Chrystèle [REDACTED]  
**Sent:** 08 June 2020 09:18  
**To:** Neighbourhood Planning  
**Cc:** Lowe, Oliver  
**Subject:** Respondent Highways England

**Importance:** High

**Categories:** Submission and publicity consultation

Dear Neighbourhood Planning Team,

Thank you for providing Highways England with the opportunity to comment on the Stanton Drew Neighbourhood Plan – Regulation 16 Consultation on the revised Consultation Statement. Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this case consists of the A36 to the east of the plan area.

As the plan area is some distance from our network, we are therefore satisfied that the proposed plan policies are unlikely to result in development which will impact significantly on the SRN and we have no comments to make. However, this response does not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the appropriate policy at the time.

We would like to be kept informed of any progress on the plan. All future correspondence are to be addressed to our Team Inbox [planningsw@highwaysengland.co.uk](mailto:planningsw@highwaysengland.co.uk).

Regards,

**Chrystèle Garnier, Administrator**  
**Performance Assurance & Business Services Team**  
Highways England | Brunel House | 930 Hempton Court, Aztec West | Bristol | BS32 4SR

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**From:** George Blanchard [mailto:George\_Blanchard@BATHNES.GOV.UK]  
**Sent:** 05 June 2020 14:30  
**Cc:** Stanton Drew PC <chair@stantondrewpc.co.uk>; 'Julie Bragg' <stantondrewparish@outlook.com>  
**Subject:** Stanton Drew Neighbourhood Plan – Regulation 16 Consultation on the revised Consultation Statement

Dear Consultee

You will be aware that the draft Stanton Drew Neighbourhood Plan has recently been subject to public consultation under Regulation 16 of the 2012 Neighbourhood Planning Regulations from 22<sup>nd</sup> November 2019 – 24<sup>th</sup> January 2020. Comments received during the consultation were passed to an independent examiner along with the Draft Neighbourhood Plan and associated documents.

The examiner has identified that the submitted Consultation Statement did not fully meet the requirements of the Neighbourhood Planning Regulations. Therefore, a revised Consultation Statement is being published for consultation.

## George Blanchard

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**From:** Stuart, David [REDACTED]  
**Sent:** 15 June 2020 11:27  
**To:** Neighbourhood Planning  
**Subject:** Respondent Historic England

**Categories:** Submission and publicity consultation

FAO George Blanchard

Thank you for your further Regulation 16 consultation on the revised version of the Consultation Statement for the Stanton Drew Neighbourhood Plan.

I can confirm that we have no comments to submit.

Kind regards

David

David Stuart | Historic Places Adviser South West  
[REDACTED]

Historic England | 29 Queen Square | Bristol | BS1 4ND  
<https://historicengland.org.uk/southwest>



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**From:** George Blanchard [[mailto:George\\_Blanchard@BATHNES.GOV.UK](mailto:George_Blanchard@BATHNES.GOV.UK)]  
**Sent:** 05 June 2020 14:30  
**Cc:** Stanton Drew PC; 'Julie Bragg'  
**Subject:** Stanton Drew Neighbourhood Plan – Regulation 16 Consultation on the revised Consultation Statement

**THIS IS AN EXTERNAL EMAIL: do not click any links or open any attachments unless you trust the sender and were expecting the content to be sent to you**

Dear Consultee

You will be aware that the draft Stanton Drew Neighbourhood Plan has recently been subject to public consultation under Regulation 16 of the 2012 Neighbourhood Planning Regulations from 22<sup>nd</sup> November 2019 – 24<sup>th</sup> January 2020. Comments received during the consultation were

## George Blanchard

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**From:** Simon Whittle [REDACTED] on behalf of Simon Whittle  
[REDACTED]  
**Sent:** 28 June 2020 12:33  
**To:** Neighbourhood Planning  
**Subject:** Respondent Simon Whittle  
**Categories:** Submission and publicity consultation

I have read the revised consultation document and am happy with the revised documents and the level of consultation that has taken place. I very much look forward to the plan proceeding to a successful referendum.

I'd also like to thank everyone who has continued to be involved in the project.

Simon Whittle  
[REDACTED]  
[REDACTED]

Stanton Drew  
Bristol  
[REDACTED]

Our Ref: MV/ 15B901605

29 June 2020

Bath and North East Somerset Council  
[neighbourhood\\_planning@bathnes.gov.uk](mailto:neighbourhood_planning@bathnes.gov.uk)  
via email only

  
[avisonyoung.co.uk](http://avisonyoung.co.uk)

Dear Sir / Madam  
**Stanton Drew Neighbourhood Plan Regulation 16 Consultation  
June – July 2020  
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan 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 Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) 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.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

#### **Proposed development sites crossed or in close proximity to National Grid assets:**

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/shape-files/](http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/)

Please also 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](http://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. We would be grateful if you could add our details shown below to your consultation database, if not already included:

**Matt Verlander, Director**

[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

**Spencer Jefferies, Town Planner**

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

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

Yours faithfully,



**Matt Verlander MRTPI  
Director**

██████████

████████████████████

For and on behalf of Avison Young

## Guidance on development near National Grid assets

National Grid 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.

### Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid'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 Grid 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 Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)

### How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: [plantprotection@nationalgrid.com](mailto:plantprotection@nationalgrid.com)

Cadent Plant Protection Team  
Block 1  
Brick Kiln Street  
Hinckley  
LE10 0NA  
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>



The Coal  
Authority

## Stanton Drew Neighbourhood Development Plan - Regulation 16 - Revised Consultation Statement Consultation

### Contact Details

Planning and Local Authority Liaison Department  
The Coal Authority  
200 Lichfield Lane  
Berry Hill  
MANSFIELD  
Nottinghamshire  
NG18 4RG

Planning Email: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)  
Planning Enquiries: 01623 637 119

### Date

8 July 2020

Dear Mr Blanchard

### **Re: Stanton Drew Neighbourhood Plan – Revised Consultation Statement**

Thank you for your notification received on the 5 June 2020 in respect of the above.

We previously commented on the Stanton Drew Neighbourhood Plan in a letter to the LPA dated 31 December 2019.

I have reviewed the revised consultation and can confirm that the Coal Authority has no additional comments to make.

Yours sincerely

*Melanie Lindsley*

**Melanie Lindsley** BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI  
**Development Team Leader (Planning)**

## George Blanchard

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**From:** Simon Waller [REDACTED]  
**Sent:** 20 July 2020 00:32  
**To:** Neighbourhood Planning  
**Subject:** Respondent Simon Waller

**Categories:** Submission and publicity consultation

I would like to make the following comments about sections of the Stanton Drew Neighbourhood Plan consultation statement document :

*Page 4 : "Since the beginning of 2013 the Parish Council (PC) and NP Steering Group have invited parishioners to engage with the neighbourhood plan process"*

The main reason the plan has taken 7 years to get to this point is that this neighbourhood plan has been developed by a few people with a vision for the village, but that vision is not what the majority of the parishioners want. Please check the original videos of the Stanton Drew NHP consultation referenced on page 10 of this document (<https://www.youtube.com/watch?v=PPhL0pH7-nc> and <https://www.youtube.com/watch?v=OS14823Nm24>)

Notice that the Site Options Long List (SOLL) of over 20 sites had been created at this very early stage, before any surveys had been conducted to understand the parishioners' views. At no point has it been explained to the parishioners over the last 7 years that a site options long list is not a requirement for a Neighbourhood Plan and indeed is very unusual for a neighbourhood plan, especially in a green-belt protected area.

*Page 4 : "A Site Options Long List (SOLL) was a desk top exercise, conducted in line with similar desk top exercises, to evaluate the appropriateness, or otherwise of sites within the Parish for development. This list was analysed for suitability against national and local planning policy, which resulted in a large number of land parcels being declared not appropriate. It was initially intended to reference the remaining options in the Plan, however, **due to significant parishioner dislike of the SOLL received during feedback on the Draft Plan**, it was decided not allocate sites for development, **but to retain the SOLL as part of the evidence base.**"*

This acceptance that the Site Options Long List is not wanted by the parishioners, but then is still retained as part of the evidence base, goes to the heart of the issues with this plan. Over 3 pages in this consultation statement document (Pages 4 to 7) provide a list of meetings and communications with the public, but the final plan ends up very similar to the original vision set out by the Neighbourhood Plan team in the video.

My largest concern is that at no point in this document or any other document in the neighbourhood plan has it been explained to the parishioners that the combination of the site options long list + a housing needs survey (neither of these are requirements of a neighbourhood plan) is the key to unlocking currently protected land outside the housing development boundary for housing developments used as rural exceptions sites - Policy RA4 of BANES Core Strategy Policy : P143 : ([https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/cs\\_pmp\\_vol\\_1\\_district-wide.pdf](https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/cs_pmp_vol_1_district-wide.pdf)).

These points lead me to believe that this Neighbourhood plan is not a plan that the parishioners want, and that it will not be supported in a vote. We need a neighbourhood plan that delivers the appropriate protection for our parish and does not create a basis for unlocking currently protected land to be used for the development of houses that are not needed.

Regards,

Simon Waller.