

## Stanton Drew NDP - Regulation 16 Representations Summary

Date	Respondent	Organisation	Comments
21/11/2019	Chrystèle Garnier-Kusiak	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>
20/12/2019	Victoria Kirkham	Natural England	Natural England does not have any specific comments on the Stanton Drew Neighbourhood Development Plan.
18/12/2019	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
31/12/2019	Melanie Lindsley	Coal Authority	<p>According to the Coal Authority records there are recorded risks from past coal mining activity at shallow depth in the area, including; mine entries, recorded and likely unrecorded shallow workings and past surface hazards.</p> <p>However, we note that the Neighbourhood Plan does not propose to allocate sites for future development and on this basis we have no specific comments to make.</p>
03/01/2020	Clerk	Stowey Sutton Parish Council	<p>At its meeting held on Thursday 2nd January 2020 Stowey Sutton Parish Council considered the draft Stanton Drew Neighbourhood Plan.</p> <p>It was resolved that Stowey Sutton Parish Council had no objections to the plan.</p>
13/01/2020	Con Bradley	-	<p>As I've remarked to the Neighbourhood Plan team, all the diagrams and maps in the plan are presented sideways. For example the map on page 29. While this is not a problem if the plan is printed, the plan is difficult to read electronically especially on a tablet where a page is reorientated as the table is rotated. I don't know if you consider this a problem but it could so easily be fixed. The plan is 96 pages long so I doubt many people will print it. It's worth pointing out that the pictures are correctly orientated so this begs the question why the maps are all sideways.</p> <p>The second problem with the maps is that they are low resolution and don't scale properly making them difficult to read. Again as an example, the map on page 29 just turns into a blur if you try to zoom in.</p> <p>Both these problems make the plan difficult to read and secondly, both problems could be fixed making it possible to actually read the plan which must be a requirement of any neighbourhood plan.</p>
14/01/2020	Ivan Batchelor	-	<p>I would like to register my support for the neighbourhood plan currently under consultation. In part because it is clearly very well researched, especially with respect to existing national and regional policy, and also I would draw attention to the fact that so many (almost all, in fact) of its included policies have received support of between 71 and 95 percent of original respondents, most of which have support within the high eighties mark, with one of the few major exceptions (internet provision - about 40%) already having been implemented in many homes within the parish.</p> <p>It would be a shame if this were to be shot down because of a small number of single-issue respondents when the support for vast swathes of it is so high, and after so much work has clearly been put into a document intended as being forward thinking - both locally in the protection of cultural assets and rejection of light pollution, and also globally in terms of promoting sustainability.</p>
15/01/2020	David Stuart	Historic England	I can confirm that there are no issues associated with the Plan upon which we wish to comment.

16/01/2020	Kristine Ann Mountford	-	<p>After long and thorough consultation, the committee of the NHP have succeeded in developing a plan in response to the community majority. Negative comments from the minority seem to be with self-interest and not community welfare in mind.</p> <p>Support is needed for both elderly and young, especially those without funds to afford adequate accommodation, transport or care. In order to continue development and welfare a caring community working together is essential.</p> <p>Thank you to the NHP committee for your tireless and committed work on our behalf, you have my full support.</p>
17/01/2020	Simon Whittle	-	<p>I agree with all of the policies in the Draft Plan (02-Oct-2019) and look forward to it passing examination and being approved in a referendum.</p> <p>I would also like to express my thanks to everyone who has contributed to the creation of the plan, which required hard work and persistence, sometimes in the face of hostile and unreasonable opposition from a small, but vocal minority.</p>
20/01/20	Richard Jenkyns (on behalf Environment Agency of Mark Willitts)		<p>Regarding the suggested Policy EL4 - Aquatic Biodiversity which is stated to be in line with the B&amp;NES Placemaking Plan, it is it is pleasing to see identified that any development must mitigate against increasing flood risk, altering the water course or harming biodiversity.</p> <p>Also as Stanton Drew is classified as a 'village washed over by the Green Belt, it is pleasing to see that in accordance with the National Planning Policy and B&amp;NES Local Plan (Core Strategy 2014 and Placemaking Plan 2017), development in villages in the Green Belt will not be permitted unless it is limited to infilling and in the case of residential development the proposal is within the defined Housing Development Boundary</p> <p>As identified with Policy EL2- Green Corridors and Biodiversity, which is stated to be in line with Section 40 Natural Environment and Rural Communities Act 2006, development proposals will be supported if the proposal promotes and protects the network of green spaces, corridors, and biodiversity, and if the application also accords with other policies in the Neighbourhood Plan.</p>
24/01/2020	Simon Waller		<p><b>[Two attachments included within the response, please see the full representation to view these]</b></p> <p>I believe this Neighbourhood Plan does not explain the highly pro-development position at the core of the planning section of the plan, and the future consequences of this, and therefore does not represent the views of the community.</p> <p>2 critically important areas never explained to the parishoners are: 1. "Unsustainable for development" status, our current gold-plated protection : this article explains the super-protection that Stanton Drew currently enjoys, over-and-above green belt protection, by having a development classification that is "unsustainable for development" (no food shop, no post office, poor transport links...). This gives Stanton Drew "gold-plated" protection from development pressure, all pressure and targets are applied to "sustainable" villages only, so Stanton Drew is completely off the development radar:  <a href="https://www.theguardian.com/society/2018/nov/19/unsustainable-villages-risk-being-frozen-in-time-saylandowners">https://www.theguardian.com/society/2018/nov/19/unsustainable-villages-risk-being-frozen-in-time-saylandowners</a></p> <p>The Neighbourhood Plan changes this, and diverts development pressure to Stanton Drew. Tactics like creating the Site Options Long List will even elevate Stanton Drew above other villages in the area for development.</p> <p>2. Rural Exception Sites Rules, the loophole to remove protection : All land outside the Housing Development Boundary (HDB) is currently protected from development. This protection can only be removed by several steps that need to driven by a Parish council.</p> <p>It appears to me that the rules of engagement of the NP are not able to handle a scenario of a very small parish, enjoying protection of the green-belt, having an un-representative pro-development Neighbourhood plan being developed in their name. Fortunately, the vote at the end of the process will indeed enable the majority to stop a plan that does not represent their views, and I am certain that this will be the outcome of the situation given this plan.</p>

24/01/2020 B&NES Planning Officers B&NES

Officers made comments on the Regulation 14 stage and informal comments leading to the publication of the plan. Areas of concern raised at the Regulation 14 stage and informal comments leading to the publication of the plan related to: Policy P&D1, P&D2, SD1, BP2 & EL8

The Steering Group engaged positively with the Regulation 14 comments and Officers are now content that the concerns relating to P&D1 and P&D2 have been resolved and that the Plan is in general conformity with Strategic Policies from the Bath and North East Somerset Development Plan. There remains, however, some concerns regarding SD1, BP2 and EL8 of the Plan. Further details are provided below.

**SD1** - Compliance with the Development Plan is a requirement for all NDPs. The policy does not add anything at a local level, we therefore suggest deletion

**BP2** - Officers are concerned over the lack of clarity over the intention of this policy, particularly it is unclear if it relates just to extensions to dwellings or to all buildings. Extensions to dwellings that are essentially just an extension for homeworking does not necessarily need a planning application, but if a material change of use occurs then the policy implies that it would be appropriate to change the use of these extensions to all the other use classes listed in the policy. These use classes could potentially result in a new planning unit being created within the residential curtilage or a mixed use unit.

Policy RE1 (Employment Uses in the Countryside) of the B&NES Placemaking Plan provides a better framework to support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings.

**EL8** - There would appear to be some duplication between this policy and SD3, from the planning and development section of the plan. We would suggest deletion of policy EL8 due to this duplication.

**Additional comments** - It would be useful if the same list of heritages assets as in the supporting document appeared in the body of the heritage section, clearly noting which assets are designated and undesignated The conservation area designation should perhaps be referenced in the heritage section at the start with a map as a basis for its further reference later in policies.