

Winshill Neighbourhood Plan  
 Consultation Friday 16th June to Friday 28th July 2017

Regulation 16 representations

Ref	Name of Person or Organisation	Policy	Comment	Do they want to be informed of decision?
<u>1</u>	<u>Sport England</u>	Whole Document	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the <b>National Planning Policy Framework (NPPF)</b>, 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.</p> <p>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 73 and 74. It is also important to be aware of Sport England's statutory consultee role in <b>protecting playing fields</b> and the presumption against the loss of playing field land. Sport England's playing fields policy is set</p>	No

		<p>out in our Planning Policy Statement: ‘A Sporting Future for the Playing Fields of England’.</p> <p><a href="http://www.sportengland.org/playingfieldspolicy">http://www.sportengland.org/playingfieldspolicy</a></p> <p>Sport England provides guidance on <b>developing planning policy</b> 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.</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of <b>assessments of need and strategies for indoor and outdoor sports facilities</b>. 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.</p> <p>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</p>	
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<b><u>2</u></b>	<b><u>Daryl Fossick,</u></b> <b><u>Severn Trent</u></b> <b><u>Water</u></b>	<p>Thank you for the opportunity to comment on your consultation. We currently have no specific comments to make, but please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.</p> <p>For your information we have set out some general guidelines that may be useful to you.</p>	Yes

		<p><b>Position Statement</b></p> <p>As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.</p> <p><b>Sewage Strategy</b></p> <p>Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.</p> <p><b>Surface Water and Sewer Flooding</b></p> <p>We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we</p>	
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		<p>made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.</p> <p>We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.</p> <p><b>Water Efficiency</b></p> <p>Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.</p> <p>We recommend that in all cases you consider:</p> <ul style="list-style-type: none"><li>• Single flush siphon toilet cistern and those with a flush volume of 4 litres.</li><li>• Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.</li><li>• Hand wash basin taps with low flow rates of 4 litres or less.</li><li>• Water butts for external use in properties with gardens.</li></ul> <p>To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website</p>	
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<u>3</u>	<u>James Chadwick, Staffordshire County Council</u>		<p>We have responded to the earlier consultations run by the Parish Council and they have incorporated the changes to the plan to address the points raised. However, we would suggest the following changes should be incorporated into the plan:</p> <p><b>Local Greenspace:</b></p> <p>It is recommended that Waterloo Clumps Biodiversity Alert Site be included in the Waterloo Clumps Local Greenspace proposal. It has recreational and wildlife value. (plan attached)</p> <p><b>Policy 4 Green and Blue Infrastructure Protection</b></p> <p>It is recommended that the following be included to reflect policy aims and comply with the NPPF:</p> <p>d) to conserve and enhance the overall biodiversity of the Parish</p>	No
<u>4</u>	<u>The Coal Authority</u>		<p>Thank you for the notification of the 16 June 2017 consulting The Coal Authority on the above Neighbourhood Development Plan.</p> <p>The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the</p>	No



		<p>planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.</p> <p>As you will be aware the eastern edge of the Neighbourhood Plan area lies within the current defined coalfield.</p> <p>According to the Coal Authority Development High Risk Area Plans, there are recorded risks from past coal mining activity in the form of recorded shallow coal workings on Ashby Road at the very eastern end of the plan area.</p> <p>If the Neighbourhood Plan were to allocate sites for future development in this area then consideration as to the development will need to respond to these risks to surface stability in accordance with the National Planning Policy Framework and the East Staffordshire Local Plan. However as the Neighbourhood Development Plan does not propose to allocate any sites the Coal Authority has <b>no specific comments</b> to make on the Neighbourhood Plan.</p> <p>The Coal Authority wishes the Neighbourhood Plan team every success with the preparation of the Neighbourhood Plan.</p>	
<u>5</u>	<u>Chris Bramley,</u> <u>Local Lead Flood</u> <u>Authority</u> <u>(Staffordshire</u> <u>County Council)</u>	<p>I have reviewed the Winhill Neighbourhood plan and have no specific comments to make in relation to the content of the document.</p> <p>I would however, note that in accordance with current national policies, development should be located in areas at the lowest risk of flooding, and should where possible be located out of the Flood Zones 2 and 3, Surface water flood risk areas and any Groundwater flood risk areas.</p>	No

			I would also advise that any site allocations that are proposed consider for the likely attenuation needs and associated land take for SuDS at an early stage to ensure that proposed developments can be brought forward with achievable housing numbers and good SuDS designs.	
<u>6</u>	<u>Phil Metcalfe, The National Forest Company</u>		<p>Thank you for consulting the National Forest Company on this document.</p> <p>We are pleased to note that this version of the Plan includes the amendments that we sought through the last round of consultation. We have no further comments to raise.</p> <p>Please continue to notify as the plan proceeds through the adoption process.</p>	Yes
<u>7</u>	<u>Environment Agency</u>		<p>Thank you for referring the above Neighbourhood Plan which was received on 16 June 2017.</p> <p>Having reviewed the documents submitted we wish to make the following comments:</p> <p><b><u>Flood Risk:</u></b> We have reviewed the Winshill Neighbourhood Plan with regard to main river flood risk and in our strategic overview role and have the following comments:</p> <p>The River Trent (main river) forms the western boundary of the plan area and has a well- defined floodplain (Flood Zones 2 and 3). At the southern end of Newton Road, there is an Environment Agency maintained flood defence on the eastern bank of the River Trent consisting of a 100m long embankment which reduces flood risk to around 30 properties.</p>	No

		<p>The majority of the plan area is located in Flood Zone 1 although there are other areas of floodplain associated with an ordinary watercourse (Dale Brook) along the northern boundary as well as areas at risk of surface water flooding. Staffordshire County Council as Lead Local Flood Authority should be consulted on these matters.</p> <p>Sections 3.1 Environment, Open Spaces, Blue and Green Infrastructure and 3.2 Local Green space mention the proximity of the parish to the River Trent and its washlands and recognise the contribution they make to recreation opportunities. As such, we support the inclusion of Newton Road Recreation Ground as an area identified for special recognition and protection. We recommend that the managing of flood risk is included as part of the justification for this protection.</p> <p>No mention is made in plan of the potential impacts of climate change. It is recommended that reference be made to the contribution that blue and green infrastructure could make with regard to mitigating and adapting to climate change.</p> <p>Section 3.4 Blue and Green Infrastructure – The extensive floodplain of the River Trent referred to here not only provides environmental and amenity areas, but also provides flood protection to Burton and neighbouring communities. We would have expected to see some reference made to the flood defences referred to above in the plan in relation to protection of existing environmental infrastructure.</p> <p>Sections 5.1 Housing and 5.2 Infill development - Whilst most of the area lies within Flood Zone 1 the Environment Agency would recommend the inclusion of a point which seeks to ensure that new and infill development does not increase the flood risk elsewhere by incorporating sustainable drainage</p>	
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		<p>systems (SuDS) to manage surface water and runoff. Where appropriate, development should include measures that mitigate and adapt to climate change.</p> <p>Policy 11 Parking – We welcome the inclusion of a requirement for permeable paving to be used when existing garden space is paved over.</p> <p><b><u>Contamination Issues:</u></b> We have the following comments to make which relate solely to the protection of ‘Controlled Waters’ receptors.</p> <p>In planning any development in this area reference should be made to our document ‘The Environment Agency’s approach to groundwater protection’, available from gov.uk. This sets out our position on a wide range of activities and developments, including:</p> <ul style="list-style-type: none"><li>• Waste management</li><li>• Discharge of liquid effluents</li><li>• Land contamination</li><li>• Ground source heating and cooling</li><li>• Cemetery developments</li><li>• Drainage</li><li>• Storage of pollutants and hazardous substances</li><li>• Management of groundwater resources</li></ul> <p><b><u>Biodiversity Issues:</u></b> We do not have any concerns with the content of Winshill Neighbourhood Development Plan overall, however we did have one aspiration for potential enhancement of the river corridor via the installation of a pond or pond &amp; scrape complex area in a suitable location on the recreational ground next to</p>	
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			<p>the river. This may also provide a good environmental educational resource for the nearby school particularly if a dipping platform can be installed.</p> <p>We hope you find the above information useful. If you have any queries please do not hesitate to contact us.</p>	
<b><u>8</u></b>	<b><u>Peter Boland,</u></b> <b><u>Historic England</u></b>		<p>Thank you for the invitation to comment on the Winshill Neighbourhood Plan. Historic England is supportive of both the content of the document and the vision and objectives set out in it.</p> <p>The emphasis on the conservation of local distinctiveness including green and blue infrastructure and variations in local character through good design along with the protection of locally significant buildings and townscape character including important green spaces is to be applauded.</p> <p>In relation to the protection of local heritage assets we strongly support the production of a Local Heritage List. You may also wish to note that in our view a “Local Heritage List” does not need to be confined to buildings and <i>areas</i>, such as the Alexandra and Scalpcliffe Roads Local Heritage Area could equally be regarded as being a component part of that list, albeit with a bespoke Policy.</p> <p>Overall Historic England considers that the plan reads as a well written, well considered, concise and fit for purpose document. The Plan takes an exemplary approach to the local historic environment of the Parish and in reflecting local peoples sense of place and commitment to their heritage it constitutes a very good example of community led planning.</p> <p>I hope you find these comments and advice helpful.</p>	<b>No</b>

<p><b><u>9</u></b></p>	<p><b><u>Charlie Riley,</u></b> <b><u>Trent and Dove</u></b> <b><u>Housing</u></b> <b><u>Association</u></b></p>	<p>Thank you for the opportunity to consult on the neighbourhood plan for Winshill.</p> <p>Overall, the document sets out the objectives and priorities for the Parish clearly. There is one comment on the document that I would like to make comment.</p> <p>Under 3.2 (Local Green Space), it is noted that land at Vancouver Drive (no. 8) has been put forward as a local green space. I understand this is owned by ESBC and have previously been marketed for sale for residential. I understand and appreciate the need for local green spaces, however, under 5.1 Housing, the neighbourhood plan, has also identifies the need for more bungalows. The site on Vancouver Drive, is one of the largest spaces in this particular dense area made up of predominantly 2 storey/family accommodation. As bungalows generally are more land hungry, the need identified by the Parish for bungalow, may not be fulfilled because the lack of land within the Parish boundaries, or through the use of in-fill sites.</p> <p>However, some bungalows could be developed on this piece of land, through the willingness of ESBC to sell at an appropriate level and in conjunction with the Parish. There would need to be careful consideration about how to design the site due to the levels and also addressing the relief of green space in the built up area. The site has a bus stop close-by and there is a small convenience store close-by.</p> <p>In addition, there is also local green spaces in numbers 7 &amp; 5 to serve the local community.</p> <p>If you wish to discuss this further, please do not hesitate to contact me and I hope these comments are useful in considering the plan.</p>	<p>No</p>
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<p><b><u>10</u></b></p>	<p><b><u>Caolan Gaffney,</u></b> <b><u>Natural England</u></b></p>	<p>Thank you for your consultation on the above dated 16/06/2017. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p><b>Natural England does not have any specific comments on this draft neighbourhood plan.</b></p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p> <p>For clarification of any points in this letter, please contact Caolan Gaffney on 02080 266680. For any further consultations on your plan, please contact: <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.</p>	<p>No</p>
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