

Marchington Neighbourhood Plan

Consultation Thursday 7th April – Friday 20th May 2016

Regulation 16 representations

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
MAR1	Sport England	General	<p>Thank you for consulting Sport England on the above Neighbourhood Consultation.</p> <p>Planning Policy in the National Planning Policy Framework 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 and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'. http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</p>	-

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
			<p>Sport England provides guidance on developing policy for sport and further information can be found following the link below: http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations. http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</p> <p>If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p>	
MAR2	Severn Trent Water	General	<p>Marchington Neighbourhood Development Plan</p> <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>	-

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
			<p>We have however set out some general information and advice below.</p> <p>Position Statement 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>Sewage Strategy 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>Surface Water and Sewer Flooding We expect surface water to be managed in line with the Government's</p>	

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
			<p>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 support the removal of surface water already connected to foul or combined sewer.</p> <p>We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.</p> <p>Water Quality</p> <p>Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.</p> <p>Water Supply</p> <p>When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. 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</p>	

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
			<p>is likely to have a greater impact and require greater reinforcement to accommodate greater demands. Once detailed plans are available we can provide further comments on water supplies in specific areas.</p> <p>Water Efficiency</p> <p>Building Regulation requirements 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"> • Single flush siphon toilet cistern and those with a flush volume of 4 litres. • Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute. • Hand wash basin taps with low flow rates of 4 litres or less. • Water butts for external use in properties with gardens. <p>We hope this provides you with useful information. We look forward to providing you with more comprehensive comments when more detailed plans and geographical locations of developments become available.</p>	

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
MAR3	Kim Miller, Planning Adviser National Trust	Policy BE1, BE2, BE3, NE1 and NE2	<p>National Trust supports the commitment of Marchington Neighbourhood Plan to protecting and enhancing local and historic character.</p> <p>Policy BE1(c) provides specific protection to the setting of Sudbury Hall, a nationally significant heritage asset in the care of the National Trust. We recognise and very much support the provisions in this policy.</p> <p>General support is also provided for inclusion of the following policies within the Neighbourhood Plan:</p> <ul style="list-style-type: none"> • Policy BE2 Protecting and enhancing (non-designated) local built heritage assets (objective 3) • Policy BE3 Protecting and enhancing archaeological sites • Policy NE1 Protecting the Countryside and Landscape • Policy NE2 Nature Conservation 	yes

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
MAR4	National Grid	Whole document	<p>Marchington Neighbourhood Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID</p> <p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p> <p>About National Grid</p> <p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customer. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p>Specific Comments</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distribution's Intermediate / High Pressure apparatus.</p> <p>National Grid has identified the following high pressure Gas Distribution pipeline as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> • 2675 Sutton-On-The-Hill To Drinton – HP Pipeline <p>National Grid has identified the following high voltage overhead powerline as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> • ZE Route – 400kV from Drakelow substation in South Derbyshire to Danes substation in Trafford. <p>From the consultation information provided, the above gas distribution pipeline and overhead powerline do not interact with any of the proposed development sites.</p>	-
MAR5	ESBC	Specific policies, see representation	<p>Marchington Neighbourhood Plan - Reg16 comments from ESBC</p> <p>ESBC has worked closely with Marchington Parish Council and NP</p>	-

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
			<p>steering group since designation and have commented extensively on previous versions of the plan.</p> <p>May 2016</p> <p>DP1: Bullet 1: delete “(17 net)” as it is out of date already and ‘approx 20 new dwellings’ should suffice.</p> <p>DP2: Second paragraph is onerous – this should be for developments if identified in a flood risk area.</p> <p>SB1(A): Fourth bullet - defining ‘small units’ would be useful – 3 beds or fewer?</p> <p>SB1(B): is any housing mix required in this allocation?</p> <p>SB1(C): Take out 5th bullet referring to flooding and drainage as last sentence of policy requires DP2 (Flood prevention and management) to be met by all developments.</p> <p>SB2: title of policy too long/confusing. Would be better written - “Policy SB2 Development outside the Marchington Settlement Boundary (Objectives 1, 2,& 3)</p> <p>Proposals for housing development outside the Settlement Boundary will only be permitted if it is demonstrated that:...”</p> <p>AB2: 5th bullet point delete second “that” in sentence, typo.</p> <p>H1: bullet point i ESBC development control have questioned how ‘visual intrusion’ could be quantified, is it loss of view?</p> <p>Bullet point iv delete “for”</p> <p>H2: last paragraph – reword as confusing. Possibly a reference to Building control regulations M4(3) if developments should be expected to include single level dwellings and/or meet the needs of the elderly and people with disabilities.</p> <p>BE1: typo on ‘C’, delete ‘ at end of sentence</p> <p>CFOS3 – this policy would be better if it was re-worded “The following open spaces (as shown on the proposals map inset) are designated as Local Green Spaces.”</p> <p>To make the second part of the policy read more clearly it could be re-</p>	

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
			<p>worded: “Development will be permitted in the designated areas where it is solely for the:</p> <ul style="list-style-type: none"> - provision of... - extension of... - replacement of...” <p>RE1: 3rd para should read “The setting of Sudbury Hall, Sudbury and Marchington Conservation Areas”</p>	
MAR6	James Chadwick, on behalf of Staffordshire Borough Council	S3.60	<p>It is to be welcomed that the Parish Council has incorporated most of the suggested amendments from the earlier County Council responses into the current iteration of the Marchington Neighbourhood Plan.</p> <p>The only substantive comment arises at s3.60 (previously s3.75). While this clause identifies the presence of the well-preserved medieval moated site at Thorn Tree Farm, it fails to acknowledge that this heritage asset is designated as a Scheduled Monument. It is noted that this heritage asset lies outside the bounds of the Neighbourhood Plan area. However, the plan should note that development within the plan area that is close to this statutorily protected site and may have a significant impact upon its setting and as such may require Scheduled Monument Consent.</p> <p>It is therefore suggested that the Neighbourhood Plan include reference to the adjacent monuments’ designated status and advise that any developer looking to take forward this site that they may wish consult with Historic England at an early stage. In this way any scheme could be designed in order minimise impacts to the setting (or indeed enhance the setting) of the Scheduled Monument.</p>	yes
MAR7	Noreen Nargas Environment Agency	See rep	MARCHINGTON NEIGHBOURHOOD DEVELOPMENT PLAN	-

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
			<p>POLICY DOCUMENT – SUBMISSION VERSION MARCH 2016 - 2031</p> <p>Thank you for referring the above submission document which was received on 26 April 2016.</p> <p>Having reviewed the document we wish to make the following comments:</p> <p>Flood risk: In section (3.45) p.19 the final sentence: In order to clarify this statement, we suggest that wording be amended as follows: ‘...the Environment Agency recommends that Staffordshire County Council, as the Lead Local <u>Flood</u> Authority, is requested to provide further advice in relation to surface water flooding and flood risk associated with ordinary watercourses.’</p> <p>Policy DP2 Infrastructure – Flood prevention management: Although the justification text refers to the use of natural flood risk management measures in the catchment, (Page 32, 3rd para), consideration should be given to including this in the policy statement e.g:</p> <p><i>“Any proposals which will contribute towards providing natural and catchment wide solutions for reducing flood risk now and into the future will be encouraged and supported. Natural flood management measures typically cost less to implement and</i></p>	

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
			<p><i>maintain than traditional 'hard' engineered defences."</i></p> <p>Our previous comments on this plan have been taken into account and included throughout this latest version of the plan and we therefore have no further comments at this stage in relation to flood risk.</p> <p>Biodiversity: We would wish to see specific reference to the potential value of implementing natural flood measures in the catchment as a tool for flood prevention and management in Policy DP2 Infrastructure.</p> <p>The delivery of natural flood measures is supported in the catchment through specific drivers detailed in our previous response such as the Statements of Environmental Opportunity for the National Character Area in which Marchington sits and the targeting statements for Countryside Stewardship within the Character Area.</p> <p>This approach would also support delivery of other policies, namely NE2 Nature Conservation.</p> <p>Contamination: We have the following comments to make which relate solely to the protection of 'Controlled Waters' receptors.</p> <p>We welcome the reference in point 4 of 'Overall Policy - DP1: Sustainable Development Principles (all objectives)' to dealing with</p>	

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
			<p>land contamination and the subsequent reference to our Groundwater Protection: Principles and Practice (GP3) document.</p> <p>In the 'Justification' (page 37) of 'Policy AB2 Development principles for the former Barracks site (Objective 1)' it is commented that:</p> <p><i>'The Environment Agency has commented that the land lies on bedrock classified a B aquifer, which is vulnerable to the effects of re-mobilising contaminants that may already be present in the underlying soil from previous land uses and so the criteria relating to pollution is particularly significant.'</i></p> <p>We are not sure who raised this point but it doesn't appear to have come from the GW&CL Team. It may relate to discussion in the 'Marchington Neighbourhood Plan – Strategic Environmental Assessment Determination Statement' (page 10)? It should be noted under the new Planning Consultation Screening Tool we would no longer comment on redevelopment at this site as it on a Secondary B Bedrock Aquifer and not in a Source Protection Zone or Secondary A Superficial Aquifer.</p> <p>Environment Protection: Main points seem to have been covered from a water quality point of view, in terms of surface water.</p> <p>The major issue for Environment Management would be that the Water Framework Directive principles of ensuring no deterioration</p>	

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
			<p>of any waterbody is the highest priority. In this case the River Dove is among the best quality fishery rivers in England and has the associated high river quality. Most brooks through the Marchington area drain to the Dove so must have the highest water quality possible.</p> <p>We would reiterate the use of Sustainable Drainage schemes in all new developments and as part of any restoration scheme following the demolition of a site.</p> <p>The clean-up operations should ensure that all contaminated land is taken to suitably authorised sites and follows the Duty of Care Responsibilities. Waste teams can guide further.</p>	
MAR8	Mark Flavell on behalf of Draycott in the Clay Parish Council	LE2 – Marchington Industrial Estate	<p>Further development at Marchington Industrial estate should be rejected if the proposal would lead to an increase in the HGV flows unless an access road from the estate to Moreton Lane is included in the proposal. Any further development should have appropriate conditions of use attached. The opportunity to impose retrospective conditions limiting night time HGV movements should be explored.</p> <p>Any proposal leading to increased traffic of any sort on Stubby Lane should be required to financially contribute to providing footpaths along those stretches of Stubby lane (from the estate in the village of Draycott in the Clay) not currently having a footpath.</p>	yes
MAR9	Mark Flavell on behalf of Draycott in the Clay Parish Council	AB2 – development principles for the	<p>Any type of development which would result in increased HGV flows (i.e. industrial development) should be rejected.</p> <p>Development should be for housing, with appropriate provision of open space/recreational facilities.</p>	yes

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
		former barracks site	Any proposal leading to increased traffic of any sort on Stubby Lane should be required to financially contribute to providing footpaths along those stretches of Stubby Lane (from the Barracks site into the village of Draycott in the Clay) not currently having a footpath.	
MAR10	Antony Muller on behalf of Natural England	NE1, NE2	<p>Policy NE1 Protecting the Countryside and Landscape (objective 3) Policy NE2 Nature Conservation (objective 3)</p> <p>Natural England welcomes these policies.</p> <p>Re - SEA/HRA screening as part of Reg 16 Natural England acknowledges the screening review and agrees that no further SEA/HRA is needed.</p>	No
MAR11	Neil Holly Barton Willmore on behalf of Evans property Group	AB2, CFOS3	<p>MARCHINGTON NEIGHBOURHOOD PLAN (2016-2031) SUBMISSION VERSION MARCH 2016 REGULATION 16 CONSULTATION</p> <p>This letter is submitted on behalf of Evans Property Group who own the former Marchington Barracks site. It accompanies a completed response form.</p> <p>This letter provides comments on two policies of the Marchington Neighbourhood plan:</p> <ul style="list-style-type: none"> • Policy AB2 Development principles for the former Barracks site; and • Policy CFOS3 Designation of Local Green Spaces. 	Yes

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
			<p>Policy AB2 Development principles for the former Barracks site</p> <p>As owners of the former Marchington Barracks site, a major brownfield site within the Parish, Evans Property Group have responded to previous consultations on the Neighbourhood Plan and have held meetings with Neighbourhood Plan Steering Group.</p> <p>As is recorded on pages 11 and 12 of the Consultation Statement submitted with the Neighbourhood Plan, at the public exhibition held by the Steering Group in March 2015 there was overwhelming local support for the Barracks site as the most suitable location for new housing in the Parish.</p> <p>On the basis of this local support, previous versions of the Plan included the former Barracks site as a proposed allocation.</p> <p>That proposed allocation met very strong opposition from East Staffordshire Borough Council. Following the Borough Council's opposition, and in particular its opinion that the allocation would necessitate Strategic Environmental Assessment, the Steering Group understandably elected to alter the policy approach to the Barracks.</p> <p>While initially disappointed with the decision not to proceed with the allocation, Evans Property Group now fully support the approach taken in Policy AB2 and intend to continue to work with the Parish Council to seek to realise the aspirations of the Policy.</p> <p>Policy CFOS3 Designation of Local Green Spaces</p> <p>Policy CFOS3(C) includes the proposed designation as Local Green Space of playing fields and woodland at Marchington Barracks. The proposed Local Green Space is shown in the Neighbourhood Plan Inset</p>	

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
			<p>Map.</p> <p>The justification provided for the proposed designation of this land is its informal recreational, landscape and wildlife roles, and military heritage.</p> <p>Evans Property Group's stance on the proposed Local Green Space was initially to seek to work with the Parish Council to achieve a formal public open space in the context of the proposed allocation of the wider former Barracks site for comprehensive redevelopment. However, at that stage we expressed misgivings about the ability of the scale of development envisaged (approx. 50 homes) to support the gift and future management of such an extensive area of green space.</p> <p>When it became clear that the proposed Local Green Space would proceed without an accompanying site allocation, we expressed further concerns about the proposed designation and the justification provided for it. We reiterate those concerns here.</p> <p>The NPPF's criteria for designation of Local Green Space are that it must be reasonably close to the community it serves, must be demonstrably special to that community, and must be local in character and not an extensive tract of land.</p> <p>Our assessment is that these criteria are not met for the following reasons:</p> <ul style="list-style-type: none"> • Save for a small area adjacent to the Forestside housing, there is no current public access to the land. It is therefore considered to be of very limited recreational value. • The proposed Local Green Space falls within areas 1a and 1b assessed in the Neighbourhood Plan Character Survey. The description of those character areas in the Neighbourhood Plan does not, in our view, support the assertion that the land is demonstrably special because 	

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
			<p>of its landscape character.</p> <ul style="list-style-type: none"> • In terms of the historic significance of the land, it was used as a sports field for the barracks, but that use ceased approximately 50 years ago. • We are not aware of any evidence that demonstrates the land to be demonstrably special in terms of its wildlife value. • Finally, in view of the large area of the proposed designation (approximately 8.9 hectares), it is considered to be an extensive tract of land. <p>Overall, our assessment is that the proposed area does not meet the criteria for designation as a Local Green Space.</p> <p>We would stress that, while Evans Property Group opposes the proposed designation of such a large area as Local Green Space because it is not in accordance with national policy, they are nonetheless very keen to provide genuinely public recreational open space (not private land designated as Local Green Space) as part of a comprehensive scheme for redevelopment of the Barracks site.</p> <p>All evidence so far is that there is strong local support for that proposition. However, designating such a large area of land as Local Green Space alone and not as part of a comprehensive redevelopment would simply undermine the future prospects of comprehensive redevelopment and public access to the land.</p> <p>We would therefore reiterate our previous suggestion that this proposed designation is deleted, or, at least, substantially reduced to incorporate only the area currently leased for recreational use (as shown on the enclosed plan).</p> <p>Conclusion</p>	

Rep No	Person or organisation	Policy	Representation	Do they want to be informed of decision?
			<p>Evans Property Group recognises the work undertaken by the Steering Group in bringing forward the Neighbourhood Plan and supports the approach it takes to future development at the Barracks site. However, for the reasons outlined above, we do not consider that the proposed extensive Local Green Space meets the criteria specified in national policy.</p> <p>We would be grateful if you could keep us updated on the progress of the independent examination. We would be pleased to discuss the contents of this letter with the Steering Group and/or Borough Council and to provide any clarification the Independent Examiner requires.</p>	