

## Claverton NDP - Regulation 16 Representations Summary

Date	Respondent	Organisation	Comments
28/05/2019	Chrystèle Garnier-Kusiak	Highways England	<p>Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance consists of the A36 (T) which run through the plan area.</p> <p>We have noted your proposed policies and are satisfied that they are unlikely to lead to development which will have a significant impact on the SRN.</p> <p>We have also noted your comments with regards to the speed limit of the A36. You will be aware that in recent years Highways England have applied a safety scheme in the locality of Claverton including the reduction of the speed limit to 50mph. Speed limits need to be intuitive, self-enforcing and appropriate for the locality. Highways England will continue to monitor vehicle speeds in this locality as we do with the entire network, however there is no accident profile to justify any further change to the existing speed limit at present.</p>
19/06/2019	Selina Jobson	Winsley Parish Council	The Claverton Neighbourhood Plan was considered to be well thought out with the intention of conserving the nature of the village and its surroundings. The Parish Council supported the proposed plan.
26/06/2019	Jacqui Salt	Natural England	Natural England does not have any specific comments on this draft neighbourhood plan.
02/07/2019	Wood on behalf of	National Grid	<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.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p>
04/07/2019	David Stuart	Historic England	I can confirm that there are no issues associated with the Plan upon which we wish to comment
04/07/2019	Savills on behalf of client	Owners of the field opposite Bassett Farmhouse	<p>The LGS approach taken by the Town Council runs the risk of undermining the spatial strategy for the District and the delivery of sustainable development across the plan period by seeking to designate a site that is suitable for sustainable residential development. The nomination for a designation of LGS is therefore NOT "...consistent with local planning for sustainable development in the area" which is a requirement of national policy (paragraphs 015 and 007 Reference ID: 37-007-20140306). Incidentally, representations are currently being prepared for the LPA pursuant to developing the frontage of this site for well-designed, much-needed affordable housing use.</p> <p>It is clear that Claverton Parish Council has not undertaken a thorough and robust assessment to justify their proposed LGS nomination in this case. This approach is contrary to national guidance which states that "...sufficient and proportionate evidence should be presented on how the draft neighbourhood plan or Order guides development to sustainable solutions" (PPG 072 ID 41-040- 20160211).</p> <p>It is contended that meaningful dialogue between the Neighbourhood Plan makers and the land-owner has taken place, in accordance with Paragraph 16 of the NPPF. My clients wish to pursue their proposals for much-needed affordable housing on the eastern part of this site, between the Walled Garden and the curtilage of Holly Cottage. This would accord the Exceptions policy and continue the existing form of development on the side of the road. Any development would preserve or enhance the Conservation Area.</p> <p>My clients have rights of passage over the access south of the Walled Garden, which the nearby church uses for access to the church for hearses etc. My clients therefore STRONGLY OBJECT to the nomination. I would strongly recommend that there is further dialogue between the Parish Council and my client and should the proposal be considered at Examination that the Examiner does not seek to take forward a LGS designation on this site.</p>
05/07/2019	Christopher Telford	The Coal Authority	Having reviewed your document, I confirm that we have no specific comments to make on it.
Late Representation			
08/07/2019	Richard Jenkyns on behalf of Mark Willitts	Environment Agency	[There are no specific comments on policies.] Notes that the Environment Agency (EA) together with Natural England, English Heritage and Forestry Commission have published joint advice on neighbourhood planning. National and Local Plan Policy approach is to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. EA states the plan should also seek flood risk management opportunities (e.g. natural flood management), and to reduce the causes and impacts of flooding (e.g. through the use of sustainable drainage systems and natural flood management in developments). The EA notes that the Neighbourhood Plan policies are looking to seek opportunities to enhance biodiversity and contribute to wildlife and habitat connectivity in the wider area. EA notes adequate water and wastewater infrastructure is needed to support sustainable development. Water efficiency measures should be incorporated into development.