

Summary of responses to the Submission Southwell Neighbourhood Plan (Regulation 16 Consultation)

Name/Organisation	Summary of Comments
English Heritage	No comments
Nottingham Trent University	<p>Supports Neighbourhood plan and in particular the recognition it gives to Brackenhurst College. Endorses the plans vision and objectives, particularly the recognition of the wider social context, protecting and managing the natural environment, supporting the residential and commercial and growth needs of the town alongside the provision of sustainable transport services. States it is NTU's intention to ensure that the accommodation needs of growing student numbers are met to a high standard, and that accommodation is located where the need for travel is minimised and supported by sustainable bus cycle and pedestrian routes.</p> <p>Support Policies E1, TA1 to TA5, CF1 to CF3 and makes specific comments on the following policies:</p> <p><u>SD1</u> – Supports and requests greater clarity on the status of Design Guide</p> <p><u>E3</u> – Support but consider third para. Should be amended to refer to the loss of 'important habitat' and duplication with design guide addressed.</p> <p><u>CF4</u> – Essential to the future of the Brackenhurst site is a drive to increase the scope of the site as an educational resource for the wider local population, not just NTU students.</p> <p><u>DH1</u> – Vital second paragraph is prefaced with , 'Within the Southwell urban boundary..'</p> <p><u>HE1</u> – Whilst acknowledging expanding student numbers, make no reference to the inevitable need to provide purpose built student accommodation in sustainable locations which minimises the need to travel, the plan should address this.</p> <p><u>HE4</u> – Supports the need to continue to develop the site at Brackenhurst as a supportive hub of the rural economy.</p>
National Trust	<p>Concerned about the final paragraph of Policy HE4 relating to the release of safeguarded land. Considers that the current wording does not specify who has the authority to determine when or how release occurs and could therefore undermine local policies and is not in accordance with NPPF. Considers that this is best determined through the review of the Newark & Sherwood Local Plan.</p> <p>Do not object to the deletion of Policy DH6 as this is adequately covered in the Newark & Sherwood Local Plan.</p>

<p>Severn Trent Water</p>	<p>Comment specifically on the following policies:</p> <p><u>E1</u> - The 'URS Hydraulic Model' contains Severn Trent Water hydraulic model information which we provided as part of the Nottinghamshire County Council (NCC) commissioned study. Any developer wishing to obtain the 'URS Hydraulic Model' itself will need to seek permission from us too.</p> <p><u>E2</u> - Whilst we are supportive of these proposals, please bear in mind that the design criteria for new sewers (which is set out in the industry standard "Sewer for Adoption") is less onerous. Also, our current guidance to developers is also less onerous with the focus on a 1 in 30 year design standard rather than a 1 in 100 year design standard which is consistent with "Sewers for Adoption" industry standard.</p>
<p>Local resident and owner of allocated site</p>	<p>Considers the Neighbourhood Plan is generally a good reflection of local residents aspirations, supports the general thrust of the policies within the Southwell Design Guide, is in agreement with the requirements of site specific policy So/Ho/1 and makes specific comments on the following policies:</p> <p><u>E1</u> – Supports clarity on requirement for site developers to comply with flood prevention requirements as part of their proposals.</p> <p><u>TA3</u> – Considers improvement of the highway network is a matter for which CIL should be used. Policy should be amended to include reference to the trigger for highways contributions from individual sites.</p> <p><u>HE4</u> – Disappointed to note there is no recognition of the role of the Brackenhurst Campus. The plan should contain policies that have regard to the expanding student population and their needs for accommodation and recreation.</p>
<p>Nottinghamshire County Council</p>	<p>Welcome changes made as a result of their previous representations and make specific comments as follows:</p> <ul style="list-style-type: none"> • The importance of wildlife and the natural environment remains well represented, which is welcomed. • Reference to Sites of Importance for Nature Conservation have generally been replaced with reference to Local Wildlife Sites. However, use of the term SINC remains in para. 2.9 and LWS's are not referenced in the glossary. • Key wildlife and landscape features continue to be omitted from para's 2.8-2.10, such as traditional orchards, hedgerows and water courses (ie. The Greet and Potwell Dyke) • In paragraphs 2.18-2.21 it is suggested that the wellbeing benefits of informal recreation and access to the countryside/natural environment are acknowledged.

	<ul style="list-style-type: none"> • In paragraph 3.3, objective 2 is welcomed and supported. • Policies E3, E4 and E5 are welcomed and supported. • The document should reference the Newark & Sherwood Landscape Character Assessment SPD to give the wider context to the rural areas which are within the NP boundary. The majority of the plan area is within policy area MN PZ 38: Halloughton Village Farmlands • Planting should reflect the character area of the Mid Nottinghamshire Farmlands Character area. • Appendix 1- Southwell Design Guide – Natural Environmental Features. The provision of buffer strips is one element to site planning and a comprehensive landscape design but is the only one listed within this section. There is a strong link with this section and the following Built 2 Built Form as planting and land form are also space defining elements in the design of development sites and such things as context and layout are equally applicable to landscape design. The provision of planning, open space and site drainage (green and blue infrastructure) should be part of the holistic site analysis and design process and while buffer strips may be important there are other factors that will have an impact on the surrounding landscape/townscape which should be included within this section.
Nottingham Trent Students Union	<p>Feel that the topic which most affects our students is Transport. Objective 4 talks about facilitating the safe movement and access to services for residents and visitors. This is something we were looking at last year with regards to the safety of the routes to and from the Brackenhurst campus. A number of members of Southwell Town Council attended our ‘Light the Way to Brackenhurst’ event last year and acknowledged that improvements could be made to improve the safety of both Nottingham Road and Park Lane.</p>
The Coal Authority	<p>No specific comments to make.</p>
Stagecoach East Midlands	<p>Formally support the plan.</p>
Anglian Water	<p>Southwell is outside their area of responsibility and so have no comments to make.</p>
Natural England	<p>Generally welcomes the plan and considers that it provides a useful framework for achieving the sustainable development of Southwell. Pleased to note that their previous comments have been taken on board and in particular support the policies encouraging the conservation and enhancement of green infrastructure and biodiversity, improvements to the PROW and wildlife corridors and the establishment of a green link around Southwell.</p>

Newark and Sherwood District Council	Support the plan and request that the following modifications are made:		
	Southwell NP ref:	Recommendation for modification	Reason
Policy SD1 Delivering Sustainable Development	Amend 1st line to read; 'Only proposals for sustainable development will be supported where...' Amend 5 th bullet point to read; 'Where any development triggers the requirement for developer contributions, as set out in the NSDC SPD, these should, wherever possible be delivered on site, rather than as commuted sums.'	As written, the policy could allow unsustainable development. For the purposes of clarity.	
Policy E1 Flood risk Assessments and Mitigation	Amend 1st paragraph to read; 'When proposals are required to submit a flood risk assessment this must take account of the most up to date EA flood mapping, hydraulic modelling and flood mitigation for Southwell. Specific regard should be had to the NCC Flood Mitigation Plan for Southwell or its most up to date equivalent. Amend 2nd paragraph to read; ' The methodology for the modelling, findings, FRA's and flood mitigation recommendations, shall be developed in consultation with the Lead Local Flood Authority.'	As written, by reference to specific documents, the policy would not be flexible. As written, the policy requires parties to agree which is unimplementable.	
Policy E2 Flood Resilient Design	Amend 'Sustainable Urban Drainage Systems' to 'Sustainable Drainage Systems'	Factual correction.	
Policy E3 Green	Amend 2nd paragraph to read; 'Where it is	As written, the policy seeks to	

Newark and Sherwood District Council contd.	Infrastructure and biodiversity	<p>apparent or becomes apparent during the course of a planning application that a site has significant ecological value, development proposals must make a baseline assessment of the habitats...'</p> <p>Amend 3rd paragraph to read; 'Where the loss of habitat cannot be avoided, the proposal should include appropriate offsetting to create a compensatory habitat to ensure that there is no loss of biodiversity.</p> <p>Amend 11th paragraph to read; 'Where the loss of protected trees as a result of a development proposal is unavoidable, appropriate replacement planting should be incorporated as part of the scheme.'</p> <p>Amend 12th paragraph to read; 'As part of development proposals, provision should be made for the long term maintenance of any retained or created habitats, existing historic landscape or ecologically valuable vegetation and buffer strip provisions.'</p>	<p>set submission requirements for planning applications which is not a development plan issue.</p> <p>The requirement for offsetting is reasonable but there is no evidence to justify the 2:1 ratio.</p> <p>TPO's are administered through their own process and not planning policy.</p> <p>The requirements for conditions/legal agreements may arise through the consideration of an application but cannot be imposed by policy.</p>
	Policy E4 Public Rights of Way and Wildlife Corridors	Amend 1 st paragraph to read; 'Where PROW's, including footpaths, cycle routes and bridle ways cross sites, they should be retained as part of development proposals wherever possible'	Policy cannot be applied to land outside an applicant's control.

Newark and Sherwood District Council contd.		Amend 2 nd paragraph to read; 'Any vegetation, including trees, large shrubs and hedges of historic, landscape or ecological value within the site should be	As above.
	Policy E5 Green Link	Amend 1 st paragraph to read; 'Proposals that could contribute to the creation of a green link around Southwell to help maintain the rural character of the town, maintain attractive PROW's linked to open spaces, for the benefit of the public and wildlife will be supported.	There is no evidence of deliverability to justify the requirement for a green link. The policy must therefore be facilitative/promotional.
	Policy E6 Climate Change and Carbon Emissions	This policy potentially facilitates wind energy development within the parish. If this is not the policies intention it will require amending. Response awaited from STC.	
	Policy DH2 Public Realm	Amend 2 nd paragraph to read; 'Where new public squares, parks or spaces are provided as part of development proposals they should be of a scale and type appropriate to the development and its context'	As written, the policy sets a requirement for public open space on commercial development without any criteria or viability assessment.
	Policy DH3 Historic Environment	Amend 1 st paragraph to read; 'Development within Southwell Conservation Area must respond to the most recent Conservation Area Character Appraisal and address the requirements of relevant development plan policies.' Amend 2 nd paragraph to read; 'Development proposals will be expected to respond to the particular characteristics of the individual Conservation Character Areas...' Amend 3 rd paragraph to read; 'Within the	Factual corrections and to facilitate implementation. Factual correction. For clarity.

Newark and Sherwood District Council contd.		<p>Conservation Area and any other area subsequently identified as of archaeological importance development proposals should be accompanied by a desktop....</p> <p>Amend 5th paragraph to read; 'On any site which is known, or likely to contain archaeological remains, proposals will be required to demonstrate how they have addressed the likely impact on archaeological and other heritage assessed by reference to sources such as the County Archaeologist and the Historic Environment Record.</p> <p>Amend 6th paragraph to read; 'Where relevant, development proposals must include a site specific method statement for the protection of any archaeology and above ground historic assets during construction and a plan to preserve then post development.'</p> <p>Amend paragraph 7.20 of Explanatory to read; 'An Historic Core (archaeological study) to be based on the principles of NSDC's</p>	
	Policy TA1 Cycle and Pedestrian Routes	<p>Amend 1st paragraph to read; 'Where appropriate, proposals for new development in Southwell must demonstrate...'</p> <p>Amend 2nd paragraph to read; 'In providing new routes or enhancing routes within new development proposals, it must...'</p>	<p>As written, the policy would apply to all types of development, which is not implementable.</p> <p>For clarity.</p>

Newark and Sherwood District Council contd.		Amend paragraph 8.3 of Explanatory to read; 'The enhancement of existing networks will be ...'	Factual correction.
	Policy TA3 Highways Impact	Amend 1 st paragraph to read; 'Where new development negatively impacts on the highway network, contributions will be sought from the developer to mitigate this effect in line with NSDC's Developer Contributions and Planning Obligations SPD. Contributions will be used to minimise and mitigate these impacts associated with the development. Omit 2nd paragraph and associated bullet points.	For clarity. This duplicates NSDC's site specific and CIL requirements. Also, it would not be possible to use contributions from a particular site to fund unrelated highway works elsewhere.
	Policy TA4 Parking Standards	Omit /amend last paragraph to read; 'Proposals for parking which enhances local and visitor access to the shopping centre will be looked upon favourably.'	As written, introduces a new developer contribution requirement without evidence, criteria or viability assessment.
	Policy TA5 Parking Strategy	Omit Policy	Does not specify the type of parking to which it is intended to apply eg. public or private. Includes elements outside the scope of planning controls eg.

Newark and Sherwood District Council contd.			bus route diversion. As the title suggests this is a strategy rather than a development plan policy and as such would be very difficult to implement.
	Policy CF2 – Green and Open Spaces and Burial Grounds	STC will need to identify the land referred to in this policy.	Land is not identified.
	Policy CF3 Primary Shopping Frontage and District Centre	<p>Amend 1st & 2nd paragraphs to read; ‘Within the Primary Shopping Frontage, as defined on the Policies Map, proposals for non retail uses at street level will be supported where they enhance the vitality and viability of the District Centre. Where non retail uses are approved in Primary Shopping Frontages consideration will be given to removal of permitted development rights to allow for the assessment of other uses impact on the vitality and viability of the District Centre.</p> <p>Amend 4th paragraph to read; ‘Development proposals involving advertisements that requires planning must reference how they have responded to the NSDC Shopfronts and Advertisements SPD.</p>	<p>As written, the policy is contrary to Strategic Policy DM11. It also contains erroneous reference to Article 4 directions.</p> <p>Advertisements are assessed against the Regulations rather than policy. Policy can only be used to assessed development requiring planning permission</p>
	Policy HE1 Housing Type and Density	Amend final paragraph to read; ‘Where dwellings (including bungalows) of one and two bedrooms are delivered, consideration will be given to removing permitted	As written, the policy seeks to remove PD rights in every case which is not justifiable.

Newark and Sherwood District Council contd.		development rights associated with alteration and extension in order to allow for consideration of the impact on the balance of the parish's housing stock.	
	Policy HE4 Economic Development and Employment	Omit 3 rd and 4 th bullet points. Amend final paragraph to read; 'Should the safeguarded land associated with the Southwell by-pass located within So/E/1 not be required and should land within allocated site So/E/3 be considered unnecessary to meet identified employment needs, both may be considered for other uses, for example residential, subject to compliance with other relevant development plan policies.	There is no evidence or justification to prevent B8 uses through express consent or permitted change of use. As written, the policy would allow for development on the whole of the protected route of the Southwell by-pass, much of which is in the open countryside, and would therefore be contrary to strategic policy.
	All site specific policies.	Amend 2 nd paragraph to read; 'In addition to the general policy requirements in the Core Strategy, <i>Neighbourhood Plan</i> and the Development Management Policies in Chapter 7, with particular reference to Policy DM2 Allocated Sites, and Policy DM3 Developer Contributions and Planning Obligations, development of this site will be guided by a developer prepared design brief....	For clarity.
	Policy SS1 Land East of Allenby Road (So/Ho/1)	Amend final sentence of point i. to read; 'Wherever possible, hedges to	In the absence of a specific scheme or assessment of the vegetation it is not possible to

Newark and Sherwood District Council contd.			insist on its retention.
	Policy SS2 Land South of Halloughton Road (So/Ho/2)	Amend 2 nd paragraph as Policy SS1	For clarity.
	Policy SS7 Southwell Depot (So/Ho/7)	Omit bullet point ii.3	No planning justification for this.

Newark and Sherwood District Council contd.

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