

**Sturton by Stow and Stow neighbourhood planning
group's comments on responses to Regulation 16
Consultation of the Neighbourhood Plan**

STURTON BY STOW AND STOW NEIGHBOURHOOD PLAN REG.16 COLLATED RESPONSES.

DATE	RESPONDENT	COMMENT	S&SNPG RESPONSE	ACTION
15.10.21	Richard Wright Operations Engineer Drainage Boards	Thank you for the opportunity to comment on the above Neighbourhood Plan, none of the area falls within a drainage board district.	No Further Action (NFA)	
27.10.21	Darl Sweetland Anglian Water	No comment	NFA	
25.10.21	Simon Tucker Canal and River Trust	No comment	NFA	
30.9.21	Keri Monger Sustainable Places Environment Agency	Thank you for consulting us on the Regulation 16 submission of the Sturton by Stow and Stow neighbourhood plan. We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement on those areas where the environmental risks are greatest. Based on the environmental constraints within the area, we have no detailed comments to make in relation to the Plan. We do however support the inclusion of Policy 13: Flood Risk. Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.	NFA	
26.8.21	Tarina Connelly Exolum Pipeline Systems Ltd.	Thank you for your letter/ email to Exolum Pipeline System Ltd dated 25th August 2021 regarding the above. Please find attached a plan of our client's apparatus. We would ask that you contact us if any works are in the vicinity of the Exolum pipeline or alternatively go to www.lsbud.co.uk , our free online enquiry service.	NFA	
22.10.21	Forestry Commission	Thank you for inviting the Forestry Commission to respond to the consultation on the Sturton by Stow and Stow Neighbourhood Plan. Unfortunately, we do not have the resources to respond to individual plans but we have some key points to make relevant to all neighbourhood plans. Forestry Commission and Neighbourhood Planning Existing trees in your community The Forestry Commission would like to encourage communities to review the trees and woodlands in their neighbourhood and consider whether they are sufficiently diverse in age and species to prove resilient in the face of tree pests and diseases or climate change. For example, if you have a high proportion of Ash, you are likely to see the majority suffering from Ash Dieback. Some communities are proactively planting different species straight away, to mitigate the effect of losing the Ash; you can find out more here . Alternatively, if you have a high proportion of Beech, you may find they suffer particularly from drought or flood stress as the climate becomes more extreme. There are resources available to help you get ideas for other species you can plant to diversify your tree stock and make it more resilient. Ancient Woodland If you have ancient woodland within or adjacent to your boundary it is important that it is considered within your plan. Ancient woodlands are irreplaceable, they have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless "there are wholly exceptional reasons and a suitable compensation strategy exists" (National Planning Policy Framework paragraph 180). The Forestry Commission has prepared joint standing advice with Natural England on ancient woodland and veteran trees. This advice is a material consideration for planning decisions across England and can also be a useful starting point for policy considerations. The Standing Advice explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees. It will provides links to Natural England's Ancient Woodland Inventory and assessment guides as well as other tools to assist you in assessing potential impacts. Deforestation The overarching policy for the sustainable management of forests, woodland and trees in England is a presumption against deforestation. Woodland Creation 2	No specific action in terms of the NP. Advice for the two Parish Councils?	

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		<p>The UK is committed in law to net zero emissions by 2050. Tree planting is recognised as contributing to efforts to tackle the biodiversity and climate emergencies we are currently facing. Neighbourhood plans are a useful mechanism for promoting tree planting close to people so that the cultural and health benefits of trees can be enjoyed alongside their broader environmental benefits. Any planting considered by the plan should require healthy resilient tree stock to minimise the risk of pests and diseases and maximise its climate change resilience, a robust management plan should also be put in place.</p>		
13.9.21	Clive Fletcher Principal Advisor Historic Places	<p>Sturton by Stow and Stow Neighbourhood Development Plan Thank you for consulting Historic England about your Neighbourhood Plan. The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.</p> <p>If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.</p> <p>Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at: - https://historicengland.org.uk/advice/planning/plan-making/improve-yourneighbourhood/ You may also find the advice in "Planning for the Environment at the Neighbourhood Level" useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from: http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environmentagency.gov.uk/LIT_6524_7da381.pdf If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, "Housing Allocations in Local Plans" as this relates equally to neighbourhood planning. This can be found at: https://content.historicengland.org.uk/images-books/publications/historic-environmentand-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf/</p>	<p>We worked closely with the County Council and have produced a comprehensive Historic Assets document. We are also working on the Lincolnshire listing of historic assets.</p>	
25.8.21	LUP enquiries HSE	<p>HSE is not a statutory consultee for local and neighbourhood plans. If there is a nuclear installation within or nearby your local plan area, we recommend you contact the Office of Nuclear Regulation. HSE has provided Local Planning Authorities (LPAs) with access to its LUP Web App https://pa.hsl.gov.uk/ and downloadable GIS consultation zones. These tools alongside HSE's published methodology (http://www.hse.gov.uk/landuseplanning/) can assist you in ensuring that land allocations do not conflict with major hazard sites and pipelines, licenced explosives sites and nuclear installations.</p> <p>Your attention is drawn to the planning policy guidance provided by your central planning departments in England, Scotland and Wales.</p> <p>For England: https://www.gov.uk/guidance/hazardous-substances in particular paragraphs 65 to 69 which explain an LPAs responsibilities when taking public safety into account in planning decisions and formulating local plans.</p>	NFA	
22.10.21	Sarah Clinch Lanpro acting on behalf of Island Green Power	<p>These representations are submitted by Lanpro Services on behalf of Island Green Power. Our comments are submitted to the Council via the specified email address by the deadline of the 22nd October 2021. Island Green Power are bringing forward proposals for a solar farm which is partially within the neighbourhood plan area. The project team are considering the adopted and emerging policies in developing our proposals.</p> <p>Relevant tests The Basic Conditions the Plan is required to meet are as follows: 'a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders. c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.</p>	Useful comments noted. NFA.	

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		<p>d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.</p> <p>e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.</p> <p>g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).'</p> <p>Our comments</p> <p>Our comments relate primarily to whether the Plan contributes to the achievement of sustainable development. Whilst the Plan does not explicitly support the generation of renewable energy, as a form of sustainable development, it does not directly contradict local and national planning policy, which are both supportive of renewable energy proposals. We support the Plan's inclusion of Community Aspirations, which represent a helpful starting point for developers from which to engage with local people about. Through our forthcoming community consultation, we will explore how our proposed development can help realise some of the Community Aspirations set out at Appendix A of the Plan with local communities.</p> <p>We are particularly supportive of the draft policies that encourage biodiversity net gain, caring for rivers and the natural environment, and managing flood risk. These are all aspects which we want to work with stakeholders on to achieve in the local area, through our development proposals.</p>	5.2c does promote renewable energy	
27.8.21	Richard Giles Limestone Farming	<p>We were emailed the link to the above neighbourhood plan earlier this week.</p> <p>An initial review of the plan brought to our attention references to a picnic area to the south of St Edith's church at Coates.</p> <p>From the photo's accompanying the plan we believe that this picnic area as shown is on private land for which Limestone Farming Co. Limited is the tenant. If correct, the land does not belong to the church or fall within its curtilage.</p> <p>Limestone Farming Co. Limited has granted permission in the past for its use in one-off events. However there is no agreement for any continuous or regular use.</p> <p>Can you please confirm the land covered by the picnic area and, if as thought it is on private land, how this is removed from the plan?</p>	See next comment below. S&SNP and the Parish Councils agreed amendments with Limestone Farming as outlined in the attached.	
223.9.21	Pam Duncan S&SNPG	<p>Further to our previous e mails, I am writing to confirm that, following discussions with representatives of Limestone Farming, we have agreed the proposed amendments to the draft Plan and supporting documents as set out in the attached report. Both Sturton by Stow and Stow Parish Councils support the submission.</p> <p>See attached</p>	As above	
21.10.21	Corinna Dietz Marine Management Organisation	<p>I am writing to ensure that you have received our MMO standard response for this consultation. A copy of the standard response is attached.</p> <p>No further comment is required from the MMO regarding the Sturton by Stow and Stow Neighbourhood Plan - Regulation 16, as the Neighbourhood Plan does not overlap with the East Inshore and Offshore Marine Plans and therefore do not suggest any anticipated impacts on the marine plans.</p> <p>We advise that you consider any relevant policies within the East Marine Plan Documents in regard to areas within the plan that may impact the marine environment. We recommend the inclusion of the East Marine Plans when discussing any themes with coastal or marine elements.</p> <p>When reviewing the East Marine Plans to inform decisions that may affect the marine environment, please take a whole-plan approach by considering all marine plan policies together, rather than in isolation.</p>	NFA	
4.10.21	Sandra Close Natural England	<p>Thank you for your consultation on the above document dated and received by Natural England on 25 August 2021</p> <p>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 has reviewed the Sturton by Stow and Stow Neighbourhood Plan. We have no specific comments to make but welcome the commitment to sustainable development, net gain and green infrastructure in the plan.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p>	NFA	
18.10.21	Lincs-Section 106NHS Lincolnshire CCG	No comments	NFA	
25.8.21	Nick Feltham	No comment	NFA	

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21.10.21	NKDC Elaine Atkin, Saxilby with Ingleby Parish Council	Please see below our feedback, via our Planning Committee: The Sturton by Stow Neighbourhood Plan is a good document and there has obviously been a lot of work to complete it. Here are a few points from Saxilby with Ingleby Parish Council, based on our experience and learning points from our NDP, which was made in 2017, and which we are about to review. 1. Traffic and speeding is identified as a community aspiration and not a policy, yet there are lots of points which would justify having it as a separate policy. 2. A professional Character Assessment would be more beneficial and is useful when commenting on planning applications. 3. It would be worth considering having a separate policy for tourism, which can be developed when reviewed. You have key tourist attractions in Stow Church, Coates-by-Stow Church and Bransby Horses. 4. Community aspirations may be better as a list of community projects. You can then link any CiL monies received, to the projects. 5. There is nothing about future housing developments and identified possible sites. 6. Walking and cycling: Consider adding in 'Don't Lose Your Way', the Ramblers' campaign to put unrecorded rights of way back on the map. Many of these reconnect villages.	Helpful comments, which are noted.	
12.10.21	Chris Bramley Severn Trent	Severn Trent do not provide Sewerage or water Services to Sturton by Stow and Stow, therefore we have no comments as per my response to the previous consultation attached for reference.	NFA	
6.9.21	Shire Group of Internal drainage Boards	Thank you for giving us the opportunity to comment on your joint neighbourhood plan. However, Sturton & Stow appear to be outside the boundaries of any drainage authority we represent. They could be within the boundaries of Upper Witham IDB though. Their contact details can be found on the ADA website here: https://www.ada.org.uk/members/upper-witham-idb/	NFA	
25.8.21	Sport England	Thank you for consulting Sport England on the above neighbourhood plan. Government planning policy, within the National Planning Policy Framework (NPPF), 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. 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 98 and 99. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy Sport England provides guidance on developing planning policy 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. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. 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. 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 provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.	The Recreation Field is owned by Sturton by Stow Parish Council, which is not considering any large development.	

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		<p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/ Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthycommunities PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing Sport England’s Active Design Guidance: https://www.sportengland.org/activedesign (Please note: this response relates to Sport England’s planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</p>		
27.10.21	WLDC	<p>Supplementary and Supporting Documents It would be helpful if references could also be given to the Neighbourhood Profile’s supporting documents: -Appendix 1 Enlarged Maps; and -Appendix 2 Supplementary Photographs and Views.</p> <p>3 About Stow and Sturton by Stow Just a suggestion but wouldn’t it be more logical to follow title order starting with Sturton by Stow first and then Stow.</p> <p>Heritage Maps pages 18 and 19: Useful maps but unfortunately difficult to identify individual listed buildings. Would be helpful if maps could be like those used to show community facilities and protected views later in NP. Here they are larger scale base maps for settlements and have annotated the features.</p> <p>Page 21 3.2.7 An update. According to latest LP4 monitoring table at 18 Oct 2021 viewable on WLDC’s website both Sturton by Stow and Stow had nil remaining growth requirements. Please view table at: Housing Growth in Medium and Small Villages (Policy LP4) West Lindsey District Council (west-lindsey.gov.uk)</p> <p>5 Neighbourhood Plan Policies 4th Paragraph. Despite what it says here, no justifications are given as to how each policy aligns with the emerging Local Plan Review. For such references need to view the draft consultation version of the Review at: Local Plan Central Lincolnshire (n-kesteven.gov.uk)</p> <p>The NPPF was updated in July 2021. All references in NP to NPPF need to come from latest version.</p> <p>Policy 1: Sustainable Development Part 1 first sentence 1 ... where it is..... NOTE: The NP’s identification of the existing or planned built up area is supported. This will certainly help determine the</p>	<p>Agreed. Page iv add in - Appendix 1 Enlarged Maps - Appendix 2 Supplementary Photographs and Views</p> <p>Good point, but the chapter starts with The Past and, therefore, the order in the title reflects the history.</p> <p>These maps are indicative and the authoritative listings may be found on Historic England site.</p> <p>Amend 3.2.7 second sentence to reflect position as at 18.10.21</p> <p>Need to note the developing Plan</p> <p>Update to NPPF 20.7.21</p> <p>Page 29. Policy 1. 1 – second line - should read “where it is...” Need to consider these points</p>	

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		<p>suitability of locations for development.</p> <p>It is noted that the NOTE is a new addition to the policy. It did not appear in the NP's Regulation 14 version. It virtually mirrors CLLP policy LP2's definition of developed footprint of settlement. Although it is useful to know what the existing or planned built up area has been based on is it necessary to repeat CLLP policy here? Also is the NP satisfied that its built-up area complies exactly with criteria a) to d)? It would unfortunately undermine the policy if it were shown that it actually included examples as given in criteria a) to d).</p> <p>Would it be better instead to say in the justification that built-up area has had close regard to CLLP policies LP2 and LP4 in defining its settlement boundary? But not include the NOTE with the policy.</p> <p>Policy 2: Residential Development Management Part 1 first sentence and redevelopment sites....</p> <p>Criterion 1 f) does not support back-land development. But criterion a) supports development on ...other sites...in the existing or planned built up area many of which could potentially be defined as back-land sites. There appears to be an inconsistency between criteria a) and f).</p> <p>Criterion m) Second sentence. Is this a planning matter? Is this reasonable to expect?</p> <p>Criterion n) It is noted that this criterion is new to the policy. It did not appear in the previous Regulation 14 version. WLDC is aware that the functioning of on-site sewage treatment facilities is a concern for the PCs. However, the operational side of sewage treatment facilities in terms of criteria n) i) to v) is not considered to be a planning application matter and therefore their inclusion in this policy is felt to be inappropriate. Ensuring on-site sewage treatment facilities operate satisfactorily is overseen by other legislation/regulations administrated by regulators such as the Environment Agency, Building Control, and the local water and drainage authorities. For example, such facilities require building regulations approval, and to accord with Approved Document H of the Building Regulations 2010. Also the operator (i.e. property owner(s)) of such a facility is understood to be subject to a permit process operated by the Environment Agency. An operator must follow the general binding rules or if not, apply for a permit. The binding rules include that the treatment facility is compliant with the British Standard in force at that time. Please go to: The Environmental Permitting (England and Wales) (Amendment)(England) Regulations 2014 at: https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-tothe-ground</p> <p>Part 2. Second sentence with criteria i to v. appears to be a completely new addition to the NP not seen in the Regulation 14 version and not commented on previously by WLDC. This part of policy appears to run contrary to Policy 1 in terms of development outside the built-up area. Policy 1 criterion d) i) to iv) takes a restrictive approach in line with CLLP strategic policy LP55 whereas policy 2 part 2 is more flexible enabling settlements to extend into open countryside in certain circumstances. These policies do not appear to be consistent with one another.</p> <p>Part 2 criteria i. What is the overall shape of the village? For the NP isn't it that already established as the existing or planned built up area of each settlement shown on policy maps?</p>	<p>and the suggested alternative way of making the point</p> <p>Amend Justification to include: 'that the built-up area has had close regard to CLLP policies LP2 and LP4 in defining its settlement boundary'.</p> <p>Good point. Delete NOTE.</p> <p>Page 32 Policy 2 . 1 – second line should be "...sites.."</p> <p>Delete: 'other sites'</p> <p>This issue is important to us given the incidents both villages have experienced. There appears to be differing views on that which is or is not planning or within the remit of the Environment Agency</p> <p>Note WLDC comment, however, discussion with other agencies would suggest this is something we would want to press for inclusion.</p> <p>Note comment and review</p> <p>Page 33 2i – review wording to read'....as far as possible the shape of the village concerned</p>	
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		<p>Part 2 criterion iii. What about extant planning permissions that run counter to the principles/provisions now established by the NP? NOTES * Same comment as given for Policy 1 where this advice also appears.</p> <p>Policy Maps 2.1 and 2.2 Maps need retitling to Existing or Planned Built Up Area to align with policy/text references to maps. For several locations difficult to see exactly where the boundary for each area goes. Could a boundary line be added to both maps and for Policy Map 2.1 this to be shown at larger scale like for Stow's. If this is difficult to achieve, just a suggestion, but how about having two maps for Sturton, north and south using Marton and Tillbridge Roads as the dividing line.</p> <p>On Policy Map 2.1 these planned built up areas need revisiting: - Planning application ref 136428 for 6 homes, the south and west boundaries of site are unclear. - PA 140331 for 5 detached homes, the site appears to extend slightly more eastwards than shown on Policy Map 2.1 Also the CLLP Review Draft Consultation version proposes 3 housing allocations in Sturton by Stow. These are shown on the interactive map, please go to: Aurora (statmap.co.uk) They are: - WL/STUR/003, this would appear to lie inside the area. - WL/STUR/006A, much of this site lies outside area but adjoins it. - WL/STUR/007, this would appear to lie inside area. Have these been considered by the NP in drawing up the boundaries for existing or planned built up areas? Two already appear to lie inside but what about extending area to include the whole of proposed allocation WL/STUR/006A?</p> <p>Policy 3: Area of Separation between Sturton by Stow and Stow Why is there significant field gaps between Stow's existing or planned built up area and the area of separation? Wouldn't it be best for planning policy purposes if both shared the same boundary in this location? Is there a specific reason why the field gaps have been omitted from the area of separation? What development policy would they currently come under? Open Countryside CLLP LP55? NP Policy 1 d)? NP policy 2 part 2?</p> <p>Policy 4: Housing Mix and Affordability Para 5.4.2 – The tenures detailed within this paragraph are not tenures that are specified as affordable housing within the latest NPPF. The justification suggests it's from the NPPF so this should really correlate with latest NPPF definitions. There also needs to be mention of the new First Homes tenure.</p> <p>Para 5.4.3 – Is this suggesting there will be a more localised housing mix detailed in Policy 4? The mix is currently set out within the CLLP's Supplementary Planning Document – Developer Contributions. But as Policy 4 doesn't specify anything other it would revert to the SPD mix.</p>	<p>should be maintained as defined by the existing or planned built up area of each settlement shown on policy maps....”</p> <p>As we understand it there is nothing we can do about them. Delete NOTES.</p> <p>Retitle Consider revise to include boundary line as suggested. Consider the suggestion of 2 maps for Sturton.</p> <p>Review and revise. Policy Map 2.1, WLDC raise queries about the planned built up areas which we will revisit as suggested, but we have a number of questions eg about WL/STUR/006A, which we had not included in the plan as we were unaware that there was a designation; this land is currently being farmed, farmland should not be built on; there is another area, which has already started to be built, land adjacent to Fleets Road, but this parcel has been removed since WLDC think other land is better to build on (farmland already mentioned), but we are not clear why.</p> <p>Review.</p> <p>Revise to correlate with latest NPPF and mention First Homes tenure.</p> <p>Review</p>	
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		<p>5.4.3- "Housing affordability ensures that larger developments will deliver the affordable houses" Not sure this sentence makes any sense or serves any relevant purpose? This paragraph needs to reiterate that should a mix of housing come forward that is different to that as per the CLLP and its SPD, it must be evidence based to show why it will be offering something different.</p> <p>Policy 4 As with the Regulation 14 version, there is still no evidence to suggest in NP locality that there is a need for older persons' accommodation, smaller properties or starter homes. The policy includes these 3 "types" of housing but starter homes is a tenure and not a type of housing and so that needs to be made a little clearer if possible or remove the reference to starter homes completely.</p> <p>Policy 5: Delivering Good Design Part 2 h) The requirement to meet Building for Life (BfL) standards is welcomed. However BfL has now been updated and renamed to Building for A Healthy Life (BHL) - a design code for neighbourhood, streets, homes and public spaces. BfL's good and very good ratings as referred to in the policy no longer appear in BHL. Instead the objective for a development is to secure as many green lights and as few red lights as possible. It is therefore suggested that this criterion be reworded to: h) will secure as many green lights and as few red lights as possible against Building for A Healthy Life design code;</p> <p>Policy 6: Historic Environment No. 33 Former Friends' Meeting House is of insufficient merit to be recognised as a non-designated heritage asset.</p> <p>Policy 7: Employment and Business Development 5.7.4 Policy 14 not 15?</p> <p>Policy 7 b) (ii) Policy 5 not 6? Is this policy referring to a single proposal or to proposals in general?</p> <p>Policy 8: Community Facilities 5.8.3 Policy 8 not 9?</p> <p>Criterion 1 c) reference to the built-up area. Is this the same area as existing and planned built-up area referred to in Policy 2 and shown on Policy Maps 2.1 and 2.2? Needs clarification.</p> <p>Part 2 Policy Maps 8.1 and 8.2 not 9.1 and 9.2?</p> <p>Policy 10: Protected Views Part 2 Should it be Protected Views rather than Locally Protected Views?</p> <p>Page 59 Policy Map 9.1 Spelling... Ordnance Survey.. Licence?</p> <p>Policy 11: Green Infrastructure The Policy makes no reference to Policy Map 11 (Map 11) which is referred to in 5.11.5.</p> <p>Map 11 Retitle to Policy Map 11.</p>	<p>Review</p> <p>Review wording and strengthen given the evidence from the questionnaires.</p> <p>Revise 2h) to reflect wording as suggested by WLDC</p> <p>This was raised at Reg 14 but locally it is felt to be significant</p> <p>Page 50 5.7.4 amend 5th line to say "Policy 14"</p> <p>Policy 7 b) i – amend to Policy 5</p> <p>Page 52 5.8.3 7th line should say Policy 8</p> <p>Page 53 – check</p> <p>Page 53 2. Change to '...Policy Maps 8.2 and 8.3.."</p> <p>Page 58 2 1st line – delete 'locally'</p> <p>Think this is OS spelling</p> <p>page 67 Policy 11 in 4 2nd line after 'assets' add and 'as depicted in Policy Map 11'</p> <p>Retitle "Policy Map 11....."</p>	
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STURTON BY STOW AND STOW NEIGHBOURHOOD PLAN REG.16 COLLATED RESPONSES.

		<p>Policy 13: Environmental Protection Part 3 Suggest reword: Developments will be supported that include environmental protection measures which clearly demonstrate mitigation, adaptation and resilience to climate change.</p> <p>Policy 14: Flood Risk 5.13.2which requires...</p> <p>5.13.2pages 73 to 75... 5.13.4 Renumber paragraph 5.13.3</p> <p>Policy 16: Footpath and Cycleways Suggest these changes to Policy Map 15 Legend: - Change from Walking Routes to Walking and Cycling Routes - Yellow route... retitle... Footpath- public right of way- walking - Blue route ..retitle...Bridleway - public right of way– walking and cycling</p> <p>6 Monitoring and Implementation 6.1.4 Need to monitor the NP against the Local Plan Review which is currently underway.</p> <p>Appendix B As mentioned earlier, ensure definitions such as for affordable housing come from latest NPPF July 2021 As mentioned earlier, Building for Life has now become Building for A Healthy Life.</p>	<p>Page 70 Policy 12 3. reword as suggested.</p> <p>Page 71 Policy 13 Flood Risk 5.13.2 2nd line amend to '..requires...'</p> <p>Page 71/72 renumber paragraph 5.13.4 as 5.13.3 and remove number 5.13.4</p> <p>Page 80 Policy 15 Policy Map15 consider changes suggested</p> <p>Page 81 6.1.4 2nd line end of first sentence add in '...and against the Local Plan review which is currently underway.' Review and revise.</p>	
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Three main areas of disagreement on the Sturton by Stow and Stow Neighbourhood Plan

There are three areas of the comments by WLDC on our Regulation 16 version of the Sturton by Stow and Stow combined Neighbourhood Plan with which we are not comfortable. They concern WLDC's comments on our draft Policies 2n), 3 and 4.

In the following paragraphs we set out in blue type why we are not comfortable with WLDC's comments, and hope that by discussion we can reach agreement.

re Policy 2n): This concerns conditions for granting permission to use Package Sewage Treatment Units (PSTUs).

Our policy sets out conditions to ensure that approval is only granted in appropriate circumstances, and that proper maintenance provisions are put in place to avoid the disruptive and environmentally damaging consequences of failure of the unit(s) allowing the discharge of raw sewage to surface ditches and watercourses. We want a pre-emptive approach, so that as Parish Councils we are not left with a damaging *fait accomplis*, and with little or no leverage.

In considering WLDC's comments, we thought it would be instructive to look back at specific examples in Stow Parish. We reviewed approved planning applications 134917 granted 7/10/16, 136031 granted on 27/4/17, and 14082 granted on 17/03/20.

In the following paragraphs, WLDC's comments are in black and our thoughts on them are in blue:

1) WLDC "The operational side of sewage treatment facilities in terms of criteria n) i) to v) is not considered to be a planning application matter"

We have difficulty with this comment on two levels:

a) Clauses i) to v) of Criterion n) constitute the whole of Criterion n), but only our clauses iii) and v) concern the operation of the facilities. The rest concern issues which are very much conventional planning matters (eg establishing the quantity of discharges to the environment, and appropriateness of the proposed destination), and

b) Our clauses iii) and v) concern preparation for the operation of the PSTUs, rather than their performance once started up.

As with all mechanical equipment, PSTUs occasionally suffer component failures. When this happens, raw sewage is discharged to the environment. This is both damaging to the flora and fauna, and very unpleasant for those living nearby.

Our clauses iii) and v) aim to establish both clear understanding of responsibilities and proper preparations for future operation, so that this damage and nuisance is avoided. We feel that planning for success is a Planning issue, whilst monitoring future performance is a compliance issue which is indeed in the domain of the Environment Agency and the other bodies WLDC mention (see paragraph 2 below).

So far, all the PSTUs in Stow for which WLDC granted planning permission discharge to ditches. Determining the responsibility for maintaining ditches is a continual headache for Parish Councils, and it is only sensible to establish this up front where ditches are to transport noxious substances out of the village environment. Furthermore, those buying houses on land which was previously farmed - and the ditches maintained by the farmer - may otherwise not know that they have inherited responsibility for the ditches, with predictable results!

The mechanism we propose to tackle both these issues – the use of Legal Agreements entered into at the very start of the development - is analogous to those used in the Central Lincolnshire Local Plan consultation draft of June 2021, policy S6 “Reducing Energy Consumption - Residential Development”, clauses 1a) and 1b). If the CLLP can use this approach to reduce harm to the environment by CO2 emissions in the future operation of houses, surely we can use it too to prevent harm to the environment by liquid discharges associated with houses?

2) WLDC: “Ensuring on-site sewage treatment facilities operate satisfactorily is overseen by other legislation/regulations administered by regulators such as the Environment Agency, Building Control, and the local water and drainage authorities.”

It is true that other agencies oversee the operation of PTSUs (though we have difficulty in seeing Building Control as separate from WLDC!). However, our policy concerns the design and preparation for operation, and is put forward because experiences to date are less than satisfactory.

Sturton Parish Council have had cause to contact the Environmental Protection team and Environment Agency regarding discharge into watercourses. They found it an extremely long and frustrating process with regard to the EA.

In our view, prevention is far better than cure. The conditions we put forward in our draft Policy 2n are designed to accomplish this, and can readily be administered.

3) WLDC: “Such facilities require building regulations approval, and to accord with Approved Document H of the Building Regulations 2010”

We note that in each of the planning applications we reviewed, approval in principle is granted with the constraint that development may not commence until details of the handling of surface and foul water have been submitted and approved in writing by WLDC. Unfortunately, after planning approval has been granted Parish Councils are not consulted. In practice, for the size of development undertaken recently in our locality, the submission is examined by WLDC's Building Control department (rather than by the Environment Agency, whose General Binding Rules pertain). We note that approvals have been granted for discharge to watercourses which do not comply with General Binding Rule 19, in that they contain flowing water in the winter, but are dry in the summer.

The General Binding Rules are available in condensed form here:

<https://www.gov.uk/government/publications/small-sewage-discharges-in-england-general-binding-rules/general-binding-rules-for-small-sewage-discharges-in-england>

4) WLDC: “The operator (i.e. property owner(s)) of such a facility is understood to be subject to a permit process operated by the Environment Agency. An operator must follow the general binding rules or if not, apply for a permit”

We have not been able to find any comments by the Environment Agency on planning applications in Stow Parish. We suspect that this may be because the level of discharge from each house in a given development is below that cited in General Binding Rule 2, and anyway the volume of discharge is not stated in the applications we reviewed. Allowing developments to go ahead with an individual PSTU per house can 'salami-slice' the overall discharge below the level requiring an EA permit, whilst the impact on the environment is

determined by the overall development. We seek to close this loophole in clause ii) of our Policy 2n).

Our policy 2n) is a means of improving the process and avoiding mishaps in an area which is both topical and not functioning to our satisfaction, and we very much want it to be included in our Neighbourhood Plan when it is put to referendum.

re Policy 3: Area of Separation between Sturton by Stow and Stow

WLDC "Why is there significant field gaps between Stow's existing or planned built up area and the area of separation? "

We left some space at the northern edge of the Area of Separation between Sturton by Stow and Stow as there is a possibility that we may be compelled to allow more building around Stow in future revisions of the CLLP, and do not want to paint ourselves into a corner. We feel that the Area we have determined is sufficient to create an adequate separation between the villages.

Policy 4 Housing mix and Affordability

WLDC "As with the Regulation 14 version, there is still no evidence to suggest in NP locality that there is a need for older persons' accommodation, smaller properties or starter homes "

This is the essentially same comment as that made by WLDC's Ms Elvin in the Regulation 14 consultation, to which we supplied a detailed response to a comment as follows:

"As part of the evidence gathering to support the formulation of Policies for the NP, The Sturton by Stow and Stow Neighbourhood Plan Group ('SSNPG') commissioned Community Lincs to conduct a survey and so doing canvass opinion on a wide range of topics of relevance to the Plan. The Survey made use of a questionnaire delivered in hard copy to all households and businesses in the Parish and also made available online. The outcome of the survey was published in January 2019, and is available on our web site here:

<https://www.sturtonandstowplan.co.uk/shared/attachments.asp?f=a34488b7%2Ddf71%2D416a%2Db52b%2Dc2460a930c7b%2Epdf&o=Sturton%2Dby%2DStow%2Dand%2DStow%2DNP%2DFinal%2DReport%2DMarch%2D2019%2Dwith%2Dappendice%2Epdf>

The responses to questions 12 and 13 are of relevance to Ms Elvin's question.

Question 12 was "In your opinion what type of housing would you like to see included in any new development?" Comments included:

- Starter homes for families and young people, first time buyers.
- Affordable homes that first time buyers can buy.

- Single unit rental bed-sits for youngsters to rent at a rate that lets them save to move up the property ladder.

- There is no accommodation suitable for housing the elderly with in-situ carers
- Local young people and young families wishing to stay or work in the area have no chance of getting accommodation.

- Far too many 5 bed executive houses being built in Sturton and Stow
- Low cost rental urgently needed.
- More affordable homes for young people who want to stay in the area.
- Some homes for young people that have lived in the village all their lives and have generations of family here but when want to leave home there is no properties we can afford to buy.
- Houses at an appropriate price for young professional couples to purchase, couples who may have grown up in the village with parents and wish to stay in the village. If I was leaving home now (in the village) and wanted to stay in the village we simply could not afford it and would be forced to look to the city, which would be a shame as this is where we grew up.

- Feel development should be mixed. Not just large exec type houses.
- Most new housing built in Stow is not affordable to younger people or older residents wishing to remain in the area but needing more suitable accommodation.
- Single-storey dwellings for older people should be included.
- There are too many homes for sale on the open market at prices that are beyond affordability for younger folk wanting to have a home of their own

Question 13 was "What style of housing would you like to see included in any new housing development?". The options provided for respondents to choose from conflated the appearance of houses with their size. Concentrating only on size and shape, the top three (ie most wished for) categories were:

- In Sturton by Stow Parish: 3- bed properties, 2-bed properties, single storey (bungalows)

- In Stow Parish: 2-bed properties, single storey (bungalows), 3-bed properties - and in both parishes, 1-bed and 4+bed properties were distinctly less in demand.

The above data demonstrates the demand for starter homes, smaller and lower priced homes for young people, and for bungalows for older and/or wheelchair-bound people.”

We wonder if the person who commented on the Reg 16 version of the plan had not read our response to the Reg 14 version, or whether a different form of response from us was sought?